

SBU Privacy Policy

Version D - March 2021 (provisional)

What is the legal basis for collecting this personal data?

GDPR specifies that organisations must have a legal basis to collect and hold members' personal data. In the case of the SBU which is a social organisation, the legal basis for holding and using the data is that it is necessary for the purposes of its legitimate interests as a membership organisation and enabling participation in an internationally recognised and regulated, competitive mind sport.

The only financial data held regarding members is a record of their payment of annual membership fees. The basis for the collection and retention of this information is simply to comply with our legal accounting obligations, as well as enabling us to know who our current paid-up members are.

What personal data does the SBU collect from its members?

The data we routinely collect include members' full name, title, gender, postal address, email address, and telephone number(s). Members of the SBU may also be members of other British Isles NBO (EBU etc) and we collect their identifying number to enable the transfer of points to the member's home union. We also collect BBO user names and may extend this to other identifiers which players might have or use to play bridge on the internet. For some of our members holding official positions or responsibilities we may hold additional information such as Club/District/Council official roles, committee memberships and tournament director roles. We no longer collect age bracket identities, e.g., junior, adult and senior.

We collect the scores from events that members play in, these are displayed on Club/District/SBU result pages. Scores are also needed to support and maintain the SBU Master Point ranking scheme.

What is this personal data used for?

We use member contact data for the administration of membership, communication of information and the organisation of events. In other words, the kind of data that members would normally expect to be held by us in order for them to belong to a members' association which the SBU is.

Where does this data come from?

Data for most of our members comes from the members themselves when they join via an SBU-affiliated club or when they update their contact information themselves on MEMPAD. The information held by the SBU may be updated by the home club secretary also, but not by any other club secretary.

If you are a direct member of the SBU, you will have provided your personal data directly to the SBU Membership Secretary when you joined, or as and when you update your own record on MEMPAD.

Who is your data shared with?

Your membership data is shared with, and used by SBU officials, district organisers and home club officials, especially when the latter has limited IT capability of its own. As a member of an SBU-affiliated club you automatically join the SBU, but only your home club secretary and SBU officials see your residential address. The SBU shares very limited data (name, number and shortened Post Code) with other British Isles National Bridge Organisations (NBO), for example the English Bridge Union (EBU), for the purpose of identifying you if you play in their events. Results data is also passed on to the SBU from other NBO, clubs and districts for use in our master point scheme.

We are using Bridgewebs to publicise the results of our national, district and club events and there is an interchange of data involved, but generally limited to name and/or number.

As we have now entered an age where bridge playing on the internet is fast becoming the norm, we are developing relationships with the bridge platform owners (some based overseas) and may share data in both directions with these businesses in relation to our responsibilities to ensure the integrity of results and the reputation of both organisations.

If you subscribe to the SBU NEWS quarterly magazine then your postal address is shared with the printer who provides a mass postal mailing service to enable the magazines to be delivered via Royal Mail. They are obliged to follow GDPR rules. In addition, we contract with a company named ECATS, which administers and scores selected national tournaments and events. ECATS are provided with the names/addresses/emails/telephone numbers of club and district secretaries, so that they can do their work, as would be the case if that work was done by SBU Tournament officials.

Your personal data held by the SBU is not sold, shared or passed on to organisations other than those indicated above, whether or not connected with bridge.

How is your data stored?

This information is exclusively stored in digital form on our MEMPAD database, which is held on a website (www.mempad.co.uk), which is security protected using DRUPAL content management software, as shown by the green padlock in the upper left-hand corner of your screen browser when viewed. The website and the database reside with an AMAZON AWS server in the "cloud". Our data is backed up daily. All information that is held on Amazon is stored in compliance with GDPR (General Data Protection Regulation). Whenever we transfer data between SBU officials it is sent or carried in an encrypted form. Individual members need a password to access their MEMPAD data, and there are higher levels of security for the very few people who have access to all the data.

Who is responsible for ensuring compliance with the relevant laws and regulations?

Under the GDPR we do not have a statutory requirement to have a Data Protection Officer.

The SBU Council has designated the SBU Member Services committee chairman, as Data Protection Officer (DPO). He informs and advises the Council, Districts and Clubs about their obligations to comply with GDPR and other data protection laws. The DPO (Bill Whyte – membership@sbu.org.uk) will be the first point of contact for supervisory authorities (e.g. the ICO) and for members whose data is held.

The DPO will also monitor general SBU, including districts, compliance with the GDPR and other data protection laws and provide advice to clubs, districts and the SBU Council as appropriate.

Who has access to your data?

The SBU Member Services Committee (3 persons in total including the DPO) have access to member data in order for them to carry out their legitimate tasks for the Union. Tournament directors have limited access to name, number, BBO user name, rank and post code to enable them to carry out their legitimate role when directing events. A club secretary can access/modify contact data for their home club members.

The SBU has two outside subcontractor (ECATS & Kestrel Press) who are provided with limited specific membership data in order to do their work. The IT contractor who designed, built and currently maintains the MEMPAD database necessarily has full access. All these outside bodies have no authority to use SBU data for any other purpose and as “data processors” are obliged to conform to GDPR regulations.

How you can check what data we have about you?

If you want to see the basic membership data we hold about you, you should contact the Data Protection Officer (membership@sbu.org.uk) or log on to MEMPAD to check it yourself.

You can contact us, in GDPR terms, with a “Subject Access Request” if you want to ask us to provide you with any other information we hold about you. If you are interested in any particular aspects, specifying them will help us to provide you with what you need quickly and efficiently. We are required to provide this to you within one month.

We would not normally charge a fee for this, although under GDPR rules we can charge a reasonable fee based on the administrative cost of providing the information if the request is onerous.

Does the SBU collect any “special” data?

The GDPR refers to sensitive personal data as “special categories of personal data”.

We do not record any such special data. To be more specific we do not collect...

Date of Birth, age, race, colour, religion or creed

Credit card or any other similar personal financial information.

How long do we keep your data for, and why?

We keep members’ data indefinitely after you resign or your membership lapses, in case you later wish to re-join. Experience tells us that lapsed members frequently return to Scottish bridge many years later, even as many as thirty-forty years later. However, we will fully delete any former member’s contact details upon their request. This means that if re-joining, such a member will start with a new number and will not benefit from any previous ranking or accumulated Master Points.

Since underlying statistical data, like scores from bridge games, continues to be necessary in relation to the purpose for which it was originally collected and processed, results from events are not deleted by the SBU although Master Points will no longer be attributed to a player who does not want their data to be kept.

Historical ranking lists and prize lists are required for archiving purposes and names cannot be deleted.

At bridge events, or at prize-giving ceremonies, photographs are taken, and may be used on the SBU, District or Club websites. Players attending such events are understood by virtue of their presence to be accepting this practice.

Other data, such as that relating to accounting/personnel matters, is kept for the legally required period.

How do you ask for data to be removed, limited or corrected?

All membership organisations are now having to become more reliant on electronic identification data to carry out their mission to communicate and inform their members. This means more reliance on accurate data. Thus, the SBU needs limited but complete data in certain areas.

- We do need to have at least two out of three reliable methods of contacting members from amongst postal address, telephone number and email address. A unique email address is considered the most important but it is recognised that some members have no access to the internet. If members are playing bridge online it will be assumed that they have an email address and this will be required.
- We do not need you to provide us with your date of birth. If you wish to enter age-limited (junior or seniors) events then we operate on an honour basis. However, if international events are involved there would need to be some reliable method of verifying age. Normally you should simply classify yourself as an 'adult' member for database purposes.
- We have no way to avoid you appearing in master point promotions lists.
- You may choose not to receive information emails from the SBU but we do need an email address to communicate administrative matters to you including 'forgotten password' updates.
- We do not normally send out emails on behalf of any other organisation, unless they are specifically bridge-related. For example, we may promote bridge events not run by the SBU, and we may provide information issued by others which we believe should be shared with our members.
- Any of these options can be implemented for you by contacting your club secretary or the Data Protection Officer (membership@sbu.org.uk).

What happens if a member were to die?

We delete a deceased paid-up member's data at the end of the current season or earlier if so requested or if current membership year has not been paid.

Can you download your data to use it elsewhere?

To have a download of the data held by the SBU, a member or lapsed member should contact the Data Protection Officer (membership@sbu.org.uk).

WL Whyte
SBU Member Services

Version A - 24/4/2018 original

Version B - 27/7/2018 minor typographical modifications

Version C – 4/8/2018 ECATS reference added, plus some minor grammatical changes

Version D – 24/3/2021 Definition of the data collected by the SBU enlarged, and references made to collecting online platform identification data. Deceased paid-up members data held until the end of the current season to enable membership income reconciliation. Options for anonymising data are removed since in the internet age, reliable identification data due to absence of physical proximity now becomes essential for a membership organisation. Only if the member has no internet connection will lack of an email address be justified.