

SBU Data Privacy Policy

What is the legal justification for collecting and holding SBU members' data?

GDPR specifies that organisations must have a legal basis to collect and hold members' 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 its legitimate interests as a membership organisation.

The legal form of the SBU is that of an incorporated charity, a Scottish Charitable Incorporated Organisation, or an SCIO (number SC051361). As such we are required by our regulatory body, the Office of the Scottish Charities Regulator (OSCR) to hold information such as members' postal addresses to formally communicate with members and enable them to fulfil their role as members of a Scottish charity.

The SBU is the governing body for the sport of bridge in Scotland; a National Bridge Organisation (NBO). As such, to ensure ethical standards are maintained, we need to identify and monitor SBU members when they play in this internationally regulated competitive mind sport.

Notwithstanding that we have legitimate interests as a membership organisation that justify holding and processing members' data, we deem it appropriate, to ensure transparency, to seek positive informed consent to our Data Privacy Policy from aspiring members.

What personal data does the SBU collect from its members?

The information we routinely collect includes a member's 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 numbers to enable the transfer of points to the member's home union. We also collect BBO usernames and may extend this to other identifiers that 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 or District official roles, committee memberships and tournament director roles. From September 2023 the SBU will also store date of birth details for Youth members (up to 31 years old) and members wishing to play in other age-related events.

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 over time. When SBU members play online we can choose to monitor performance and exchange identifying data with the platform provider (who may be based outside Scotland or the UK) to identify and monitor any suspected breaches of ethical standards.

We hold members' financial data in the form of records of their payment of annual membership fees and entry payments for competitions and events. The justification for the collection and retention of this information is simply to comply with our legal and tax accounting obligations, as well as enable us to know who our current paid-up members are. Where payments (such as refunds) are made using internet banking to members, we retain a record, completely separate from Mempad and protected by two passwords, of the account name, sort code and account number for audit purposes.

When we hold in-presence events such as congresses or finals of major competitive events, we may take photographs of participants for publishing on our website. We will assume by your presence that you agree to your photograph being taken unless you indicate to the contrary.

What is this personal data used for?

We use members' contact data for the administration of membership, communication of information and the organisation of events. The contact data used by the SBU are solely of the type that members of a members' association would normally expect to provide so that the association can perform its role.

Where does this data come from?

Initially, the contact data (name, postal address, email address, etc.) comes from members themselves when they join the SBU, or when they update their contact information on our database (MEMPAD). Some information held by the SBU may also be updated by the home club secretary or by SBU officials if they receive it directly from the member.

Data generated when playing online is captured by the platform provider and may be merged with SBU held contact data to accurately identify players of interest.

Who is your data shared with?

Your membership data is shared with and used by SBU officials, district organisers and home club officials. The SBU shares extremely limited data elements (name, SBU number and shortened Post Code) with other British Isles NBO, for example, the English Bridge Union (EBU), to identify you if you play in their events. Results data is also passed between the SBU and other NBO, clubs and districts for use in our master point scheme.

We use Bridgewebs to publicise the results of our national, district and club events and there is an interchange of data involved, but this is limited to name, rank, and number.

As we are now in an age where bridge playing on the internet is a new norm, and as a result, we have contractual relationships with the bridge platform providers, some of whom are based overseas. Player data may be transferred in both directions between us and these businesses to fulfil our responsibilities to ensure the integrity of results and the reputation of both organisations.

We contract with a company named ECATS, which administers, and scores selected national tournaments and events. ECATS are provided with the names/email addresses of club and district secretaries, so that they can do their work, in the same way, that such work would be done by SBU Tournament officials.

From time to time, we may contract with outside professional bodies to conduct surveys or similar communication exercises. This may require the release of members' email addresses so that arms-length studies may be undertaken. In such cases, we will require a contract that stipulates sole use of the email addresses and their destruction on completion of the task. Members will be advised before any such situations.

Your data held by the SBU will not be sold, shared, or passed on to organisations outside of the situations indicated above.

How is your data stored?

This information is stored in digital form on our MEMPAD database, which is held on a server in the "cloud" and accessible via a website (www.mempad.co.uk), which is security protected using DRUPAL content management software.

Our data is backed up daily. All information held on the server is stored in compliance with GDPR (General Data Protection Regulation). Whenever we transfer collective data between SBU officials it is sent or carried in a password-protected form.

Individual members need a password to access their MEMPAD data, and there are higher levels of security for the less than ten SBU officials 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 name a Data Protection Officer.

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

The DPO will monitor SBU compliance with the GDPR or other data protection laws and will provide advice to the SBU Board of Trustees who are responsible for SBU adherence to Scottish and UK legislation.

Who has access to your data?

The SBU Member Services Committee (3 persons in total including the DPO) have access to member data to carry out their legitimate tasks for the Union. Tournament directors have limited access to name, number, BBO username, rank, and postcode 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 a subcontractor (ECATS) who is provided with separate limited specific membership data to do their work. The IT contractor who maintains the MEMPAD database (Rohallion Ltd) necessarily has full access to the database. These outside bodies have no authority to use SBU data for any other purpose and as “data processors” are legally obliged to conform with GDPR.

How can you 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 dataprotection@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 certain aspects, specifying them will help us to provide you with what you need quickly and efficiently. We are required by law to provide this information 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 or sensitive” 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 race, colour, religion, creed, or credit card data.

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

We keep members’ data for 6 years after they resign, or their membership lapses, in case they later wish to re-join. Experience tells us that lapsed members frequently return to the game of bridge many years later, even as many as thirty-forty years later. However, we will delete lapsed members’ contact details to the limits ordained by Scottish Charity legislation, upon request. This means that on 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 for the purpose for which they were originally collected and processed, results from events are not deleted by the SBU although Master Points will no longer be attributed to a player if this is requested.

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

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

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

- We do need to have reliable methods of contacting members, namely postal address, telephone number and email address. Email addresses should be unique to ensure confidentiality.
- From September 2023 new SBU members will be asked to provide their date of birth if they want to take advantage of Youth membership (under 31) or wish to play in age related Senior events. Date of birth details, when provided, will be stored securely as described above.
- We have no way to avoid a member appearing in masterpoint promotions lists.
- 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 if we believe it will be of interest to members.
- Any queries regarding how an SBU member's data is held or used should be directed to the Data Protection Officer dataprotection@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. If the current year's membership subscription is not yet paid, we delete the contact data as soon as possible after verification.

Can you download your data to use it elsewhere?

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

Charmian Entwistle
Data Protection Officer
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Data Control	
Date of approval/last review	08/01/24
Date of Next Review	08/01/25
Approved By	Board of Trustees