



# West Midlands Bridge Club Ltd

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## PRIVACY POLICY

### 1. What personal data does West Midlands Bridge Club Ltd (WMBC) collect?

- a) The data collected by WMBC includes:
  - i. Members' (which may include applicants for membership, associates, and visitors) names, addresses, telephone numbers (home and mobile) email addresses, gender, memberships of previous bridge clubs, category of membership, subscription payment information (NB the Club does not process credit/debit card information in any form) EBU number, and, in the case of Junior Members, dates of birth.
  - ii. Course Attendees' names, addresses, telephone numbers (home and mobile) email addresses, EBU number (if applicable), details of courses attended, and any related and relevant information and, in the case of Junior Members, dates of birth.
  - iii. Visitors' names, and contact information (address, email address, telephone number)..
  - iv. Associates' (being a person who supports one or more of the Club's activities, but who is not a member of the Club) names, addresses, telephone numbers (home and mobile) email addresses, EBU numbers and, in the case of Junior Members, dates of birth.
  - v. Third Party Users of the premises (including car park) - Names, addresses, telephone number(s), email addresses, car make, model & registration number, and company details.
  - vi. CCTV images may be collected for the safety and security of the premises, equipment, all users of the premises, and the local community.
- b) The Club collects playing data from bridge, and some teaching/improver, etc, sessions, which is uploaded to the English Bridge Union (EBU) for the purposes of Universal Membership Fees, the National Grading Scheme (NGS), and Master Point Scheme.
- c) For some of our members/associates additional information is held such as committee memberships, teaching qualifications, Criminal Records and DBS (Disclosure and Barring Service) checks - done with the knowledge and permission of the individual - or tournament director roles. Information relating to disciplinary matters and sanctions is also stored.
- d) For those people who have participated in, or won, an event, or events (internal or external), photographs may be taken for use in publicity, present or future. More general photographs of events may also be stored for such use. If anyone wishes to be excluded from having his or her photo taken please inform the Club and the photographer.

- e) Arrangements relating to Junior Members are handled on a case by case basis in line with this Policy, but on a more stringent basis. Contact details of a Junior Member must not be shared with anyone. A request for a Junior Member's contact details must be reported to the Chairman of the Rules and Ethics Committee, or Chairman of the Board, immediately.

## **2. What is this personal data used for?**

- a) Your data is used for:
  - i. The administration of your membership, or application for membership in order to inform other members of who is applying for membership of the Club, and who the proposer and seconder is; the communication of information, including sending notices of meetings, subscription renewals, host arrangements, partnership arrangements, event information, commentaries, appeal forms, event/hand reports, Committee/team arrangements, and the organisation of competitions and other events.
  - ii. A limited amount of data is used by scoring programs to ensure that members' results are correctly attributed to them.
  - iii. The administration of your use of the premises or car park. Eg invoicing.
  - iv. Monitoring of Course progression, educational activities, and mentoring arrangements.

## **3. Who is your data shared with?**

- a) It is a condition of membership (herewith confirmed) that membership data is supplied on your behalf to the English Bridge Union, who in turn provides it to your County of Primary Allegiance (which is, unless you have already specified a different County for this purpose, Warwickshire Contract Bridge Association) and English Bridge Education and Development (EBED). Once this data is uploaded the first time, the Club accepts no further responsibility for the passing of information from the person to the EBU. Any amendments to data held with the EBU is then down to the Member to manage. Please see the EBU's Privacy Policy (<http://www.ebu.co.uk/gdpr/privacy-policy#access>).
- b) The Club also (again a condition of membership) may share data, name, telephone number, and email address with Warwickshire Contract Bridge Association (WCBA), the English Bridge Union, and English Bridge Education & Development (EBED) for the purpose of membership and event management, course administration, and competition entry.
- c) Applications for membership are displayed on the Club Noticeboard, which is visible to all users of the premises. The application form displayed will be a redacted copy of the applicant's form. The data required on display will be: Name, Gender, Town and County of Residence, EBU Membership Number, Previous/Other Bridge Clubs, Type of Membership, Proposer & Seconder, and signatures.
- d) Unless agreed by the Board, there is no facility for anonymisation or pseudonyms of any kind.

- e) Unless you choose (within the EBU domain) to have your NGS grade kept private, or your Master Point rank hidden, information that derives from scoring, such as Master Point rank or NGS, is listed with your County of affiliation and is publicly available. This is also available to bridge scoring program users for stratification and handicap purposes. NB making your NGS grade, and/or Master Point rank private will exclude you from events/categories of prizes that are dependent on such grades being available (eg Stratification prizes).
- f) A limited amount of information (name, EBU number, county, post town) is listed in the database made available for use by scoring programs. This is to allow the correct identification of players for scoring purposes.
- g) Some of your data will be available for use by organisations that act as Data Processors on behalf of the English Bridge Union, such as Bridgewebs. These Data Processors are not authorised to pass your information on to other organisations that are not connected with the EBU.
- h) Data relating to the sessions of bridge you participate in, including your name, are uploaded to the Club's Website (and, sometimes, the County, EBU, and special event Website(s)). It is a condition of membership that all such data is shared and not in any way withheld or anonymised.
- i) If you have indicated your willingness to do so, your Name, Email Address and Primary Telephone, will be shared with other members via the Members' list provided to members for non-commercial bridge related purposes only.
- j) Members serving on the Board, a committee, or within a team (including the team of hosts) will share their telephone numbers and become part of an email group to enable essential communications and discussions between committee/team members. If you do not wish your personal email address to be used in this way, please inform the Club of an alternative email address for this purpose. It is expected that team members will respect the privacy of other team members in not sharing the contact details of others with anyone outside of the respective team(s).
- k) Members who make use of the Partnership Co-ordinator or Mentoring Schemes, will be deemed team members of those schemes for the purpose of this Policy.
- l) Members and Associates who become part of any team supporting the Junior Bridge programme will automatically have his or her contact details shared with other such team members, WCBA Safeguarding Team, and any organisation nominated by WMBC to be responsible for Safeguarding procedures.
- m) Data relating to third party users will not be shared with any other organisation, save in 30 below.
- n) The Club will not supply your personal data to anyone else, other than those indicated above, even if connected with bridge.

- o) The over-riding exception is that the Club may provide data to the Police in response to a specific request in relation to criminal activity.

#### **4. Where does this data come from?**

- a) Data is collected from a range of sources:
  - i. Membership application form
  - ii. Annual member details update forms/emails
  - iii. Board decisions as to membership category, subscriptions, etc
  - iv. Course Application forms/emails
  - v. Event organisers
  - vi. WCBA, EBU or EBED
  - vii. Third party users of the premises (various forms/emails)
- b) Scoring data from all the games you play in is provided to the EBU electronically by the sponsoring organisation of the game in question. This may be done by uploading a scoring file directly from the scoring program to the EBU website, or by uploading the file to the club's My EBU, or by using a third-party processor such as Bridgewebs.

#### **5. How is your data stored?**

- a) Data, including the membership database, is primarily stored in digital form on computer(s), and using a secure cloud-based storage medium (accessible by relevant Board and Committee members), which is compliant with the General Data Protection Regulation (GDPR).
- b) Information relating to sessions of bridge is stored, in perpetuity, on the website. Certain data will be removed upon deletion of a Member, but ranking lists will still contain the person's name.
- c) The remainder of data is kept in the form of written documents stored at our premises at 909 Warwick Road, Solihull, B91 3EP.

#### **6. Who is responsible for ensuring compliance with the relevant laws and regulations?**

- a) Under the GDPR (General Data Protection Regulation) there is no statutory requirement to have a Data Protection Officer. The Board is collectively responsible for ensuring the Club discharges its obligations under the GDPR and they are the people who are responsible for maintaining a log of data breaches and notifying the ICO and any Members affected as necessary, in accordance with our legal obligations.

#### **7. Who has access to your data?**

- a) Club Officials (All Board members, selected committee members, and the Club Steward) have access to your information for purposes associated with Bridge, or use of the premises. For example, the host co-ordinator will have access to your Name, Telephone Number, Email Address and Home Address, for the purposes of 1) knowing if you are a

suitable person to act as a host in terms of how far away from the Club you live, and 2) contacting you.

- b) Organisers of events can access the EBU database that provides the limited information necessary for them to correctly identify players. This information may be further limited by members choosing to have their NGS grade or Master Point rank kept private, or by choosing to become an anonymous member.

#### **8. What is the legal basis for collecting this data?**

- a) West Midlands Bridge Club collects personal data that is necessary for the purposes of its legitimate interests as a Private Members' Club and as a sovereign entity of an internationally recognised and regulated competitive mind sport.
- b) For some data, such as that relating to financial matters, the basis for its collection and retention is to comply with our legal obligations.
- c) Similarly, personnel data may be kept in compliance with our legal obligations.

#### **9. How you can check what data we have about you?**

- a) You can contact the Club, [data@westmidbridge.co.uk](mailto:data@westmidbridge.co.uk), or write to the Board, with a 'Subject Access Request' if you want to ask us to provide you with any information we hold about you beyond that which is available online (ie past results). 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. There is not usually a fee for this, although we can charge a reasonable fee based on the administrative cost of providing the information if a request is manifestly unfounded or excessive, or for requests for further copies of the same information.

#### **10. Does the Club collect any 'special' data?**

- a) The GDPR refers to sensitive personal data as "special categories of personal data".
- b) Of these categories, the only data the Club records relates to the disabilities of some of our Members when they have explicitly requested it to be recorded for the purpose of, for example, seating rights or exemption from the Bye Law relating to contributing time in support of the Club. If you wish to change this data on your record you can do so at any time by contacting [data@westmidbridge.co.uk](mailto:data@westmidbridge.co.uk), or writing to the Board.
- c) The Club may hold special data for any users of the premises who require additional support or special circumstances.

#### **11. Can you ask for your data to be removed or limited?**

- a)
  - i. Members & Course Attendees: Yes, but see 11b and 11c following. However, unless agreed by the Board, you may have to terminate your membership of the Club. There is no facility for anonymisation or pseudonyms. However, the Club will

retain a record of your name, EBU number, period of membership, details of any disciplinary actions, along with the termination request, in order to determine any future membership request.

- ii. Associates: Yes, but see 11b and 11c following
  - iii. Third Party Users of the premises: Yes, but see 11b following.
- b) The Club will retain a record of your name, any EBU number, period of membership, association or use of premises, financial transactions, details of any disciplinary/conduct actions/issues, along with the termination request, in order to determine any future membership/use of premises request
  - c) Data uploaded to a website (see 3e) will not be removed unless there is an exceptional circumstance as determined by the requestor and the Board. However, if requested, names will be removed from photographs.
  - d) If the removal of data relates to announcements on the website, or notice board, or photos, this will normally be actioned within 7 days.
  - e) Access to personal details of Junior Members is limited.
  - f) Please see the EBU's Privacy Policy, <http://www.ebu.co.uk/gdpr/privacy-policy#access>, for details of how to remove or limit your data held by them.

## **12. Can you ask for your data to be corrected?**

- a) Yes. And this will normally be actioned within 7 days. Please send your request to [data@westmidbridge.co.uk](mailto:data@westmidbridge.co.uk), or write to the Board, with a 'Subject Amendment Request'.
- b) Updates provided with the annual membership subscription return may take longer to process.
- c) Please see the EBU's Privacy Policy, <http://www.ebu.co.uk/gdpr/privacy-policy#access>, for details of how to amend your data held by them.

## **13. How long is data kept for, and why?**

- a) Members' data is retained after they resign, or their membership lapses. This is because members sometimes later wish to re-join (occasionally after several decades) and previous information is necessary to determine if said member should be readmitted.
- b) Historical ranking lists, prize lists, event photographs, and website announcements, are required for archiving purposes and names will not normally be removed from them. (see 11c).
- c) Other data (including that relating to non-members) is retained for as long as it is deemed necessary to comply with financial regulations, or to determine future requests for, eg, membership, course registration, car parking, etc.

## **14. What happens if a person dies?**

- a) A person's information is deleted after they die, save in 13b above.
- b) Some members may have an obituary, which is included on the website in honour of the member concerned. Obituaries will not be removed unless there is an exceptional circumstance, as determined by the Board, and as notified by those responsible for the Estate of the deceased.

Adopted by the Board: 3 March 2018

Reviewed, Amended & Adopted by the Board: 18 December 2018

To be reviewed annually.