

Leeds Bridge Club Trust (LBCT) – Privacy Notice

This note tells you: what information we seek from you; the legal basis on which we seek this information; what we do with it; and your rights to require us not to process some personal information in particular circumstances.

Any information we have about you is treated as confidential and accessed by authorised personnel only.

Please address any questions, comments and requests regarding our data processing practices to the club secretary, membership secretary or any director.

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

Under the GDPR (General Data Protection Regulation) we do not have a statutory requirement to have a Data Protection Officer. The person who is responsible for ensuring LBCT discharges its obligation under the GDPR is the company secretary.

If you have a concern about the way we are collecting or using your personal personal information, you should raise your concern with us in the first instance or directly with the Information Commissioners Office at <https://ico.org.uk/concerns/>.

2 Why do we collect and use your personal information?

We collect, administer, and communicate your personal information as necessary to enable LBCT to fulfil its legitimate purpose of carrying out its role as an EBU affiliated bridge club and in meeting the company's statutory and charitable objectives. We also use it as necessary to comply with any relevant legal obligations, for example activities in relation to prevention, detection and investigation of crime. We will seek your consent should we want to use your personal information for other purposes.

Specifically, we use members' personal information for: the administration of our membership; the communication of information about club events and members' achievements; and the organisation of and reporting of the results of club competitions and other events. We provide a limited amount of personal information for use by scoring programs to ensure that members' results are correctly attributed to them.

3 Where does your personal information come from?

We collect personal information from members when they join or when they update their information either directly or via their EBU record. Other information is collected when you interact with LBCT, e.g. when attending classes as a student, or as a visitor at bridge sessions, or participate in club events. Scoring data comes directly from the results of the club games.

4 **What personal information do we hold?**

The personal information we routinely collect includes your name and contact details (including addresses), and, if you are a member, the dates of registration and cessation of membership, results in club events, EBU number and instructions if any regarding how and when your personal information can be shared. We collect scores from games members play and they are displayed on our results pages on Pianola and on our notice board.

For some of our members we may have additional information such as committee memberships, or tournament director and other club roles. We will also keep information relating to disciplinary matters and sanctions.

Personal information is also collected where payments are made to the company and for correspondence with individuals.

Unless you have chosen 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 publicly available. This is also available to bridge scoring program users for stratification and handicap purposes.

5 **Who has access to your personal information?**

Access to your personal information is restricted principally to the club secretary, membership secretary, treasurer, assistant treasurer and company secretary. Other committee members and others have access as necessary for their functions.

Members have access to other members details in password protected Pianola, as long as those members have given the appropriate permission. These permissions are given at the time of joining and can be changed at any time by the member logging on to their account and going to 'Privacy'.

6 **How long is your personal information held for?**

We normally keep members' personal information after they resign or their membership lapses in case they later wish to re-join. However, we will delete any former member's contact details on request as long as there are no complaints/disciplinary matters or overriding legal or regulatory obligations to retain such details. We may retain personal information for longer where EBU retains personal information for its purposes or where you ask us to retain the personal information.

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 used for the NGS are not deleted by Leeds Bridge Club Trust or the EBU although they will no longer be attributed to a player who does not want their personal information to be kept.

Historical ranking lists and prize lists are required for archiving purposes and names cannot be removed from them.

Other personal information, such as that relating to accounting or personnel matters, is kept for the legally required period.

7 **Who do we share your personal information with?**

Your membership data is passed on to the EBU, of which you become a member when you join LBCT. The EBU shares data with its associated charity, English Bridge Education and Development (EBED), since it shares offices and data systems with them, and also with Yorkshire Contract Bridge Association or any other county that you may have nominated as your county of allegiance.

Information from your results is also passed on to the EBU for use in its master point and NGS schemes and, unless you have chosen to have your NGS grade kept private, this may also be used for stratification and handicap purposes.

Some of your personal information will be available for use by organisations that act as Data Processors on our behalf, such as Pianola. They are not free to pass this on to other organisations that are not connected with LBCT.

Members' names and addresses, and with your consent email addresses, may be passed to Moor Allerton Sports and Social Centre (MASSC), as to access the facilities of LBCT at Stonegate Road LBCT members have also to become members of MASSC.

We may also pass on personal information to the police or HM Revenue & Customs if lawful to do so.

8 **How your personal information is stored**

Most of your personal information, including much of our main membership base, is stored in digital form on computers. The remainder of your personal information is kept in the form of written documents that are to be deleted or stored at our registered office when not required for current use.

Any information that is stored remotely is stored in compliance with the GDPR.

9 **How can you ask for your personal information to be removed, limited or corrected?**

There are various ways in which members can limit how their personal information is used -

- By logging into their account on Pianola (or by contacting support@pianola.net) members can:
 - Update their contact details
 - Maintain club membership with limited contact details provided that these include your correct name and address for legal reasons. This would limit communications where an email address was not given.
 - Choose - in the 'Privacy' section - how much of your personal information other members can see if they log in to their own account.
 - Opt out of receiving emails via Pianola by choosing the 'Communication Preferences' tab. There is also a 'click here' to stop emails at the bottom of each email sent out via Pianola;
- By logging into their EBU account Members can:
 - Choose to have their NGS grade kept private, but if you do this you would not be able to benefit from any stratification or special prizes based on it. You can change this option as often as you wish.

- Choose to have the information held by the EBU updated – this can be done direct with EBU or by the Club, if you have given us permission to change your EBU record.
- Choose not to appear in master point promotions lists.
- Choose to become an “anonymous” member of the EBU. This would involve having a pseudonym with an EBU number under which the member would play. A member who does this will not be able to access any EBU membership benefits such as the magazine or playing in EBU tournaments.
- Choose not to receive information emails from the EBU and EBED

These options can be implemented for EBU membership by logging on to My EBU, going to Account → My Details and editing the record there, either to correct erroneous personal information or to delete information.

If any assistance is needed with this Members may contact the EBU Office Manager membership@ebu.co.uk

10 **What are your rights?**

You have the right to:

- Be informed about how we use your personal information.
- Request access to the personal information that we hold.
- Request that your personal information is amended if it is inaccurate or incomplete.
- Request that the processing of your personal information is restricted.
- Object to your personal information being processed.
- Withdraw any consent you have given to the processing of your personal information.
- Ask us to restrict what we use your personal information for where:
 - you have identified inaccurate information, and have told us of it;
 - we have no legal reason to use that information but you want us to restrict what we use it for rather than erase the information altogether

Where possible we will seek to comply with your request, but we may need to hold or use information because we are required to by law.

- Ask for your personal information to be deleted, for example:
 - Where there is no compelling reason for its continued processing.
 - Where it is no longer needed for the reason why it was collected in the first place
 - Where you have removed your consent for us to use your information (where there is no other legal reason us to use it)
 - Where deleting the information is a legal requirement.

Please note that we cannot delete your information where we are required to have it by law or it is necessary for legal claims:

Where your personal information has been shared with others, we will do what we can to make sure those using your personal information comply with your request for erasure.

11 **What happens if a member dies?**

We inform the EBU. We normally keep members' information after they die. If requested by their next of kin to delete it we will do so on the same basis as when requested to remove personal information by a former member.

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| Leeds Bridge Club Trust
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