

Legitimate Interests Assessment for London Business Houses Contract Bridge Association (LBH)

What are the legitimate interests?

<ul style="list-style-type: none"> Why do you want to process the data? 	<p><i>The data needs to be processed to allow the LBH to function as a membership organisation. Personal data needs to be collected to contact captains and to facilitate the organising of team matches. Details of players, as separate to captains, are required for accurate identification to score bridge games.</i></p>
<ul style="list-style-type: none"> Who benefits from the processing? In what way? 	<p><i>The processing facilitates the organisation of competitive bridge.</i></p>
<ul style="list-style-type: none"> Are there any wider public benefits to the processing? 	<p><i>The EBU and its members benefit from the processing by being able to function as the national authority of an internationally recognised and regulated, competitive mind sport, running a grading and ranking scheme as would be expected for such an organised undertaking.</i></p>
<ul style="list-style-type: none"> How important are those benefits? 	<p><i>They are essential member benefits of belonging to the LBH and the EBU.</i></p>
<ul style="list-style-type: none"> What would the impact be if you couldn't go ahead? 	<p><i>As the principal format is bridge matches organised between teams, those teams could not contact each other to arrange fixtures. If we couldn't contact captains, they and their teams would miss out on many of the benefits of LBH membership.</i></p>
<ul style="list-style-type: none"> Would your use of the data be unethical or unlawful in any way? 	<p><i>No.</i></p>

Apply the necessity test.

<ul style="list-style-type: none"> Does this processing actually help to further that interest? 	<p><i>This processing is essential for the LBH and EBU to provide services to members and to fulfil their roles in the organisation of the game of bridge.</i></p>
<ul style="list-style-type: none"> Is it a reasonable way to go about it? 	<p><i>It is a reasonable way and one that would be expected by our members.</i></p>
<ul style="list-style-type: none"> Is there another less intrusive way to achieve the same result? 	<p><i>We keep our data processing to a minimum and allow members to provide us with the minimum that allows us to function. We cannot see a less intrusive way of reaching the same outcome.</i></p>

Do a balancing test. Consider the impact of your processing and whether this overrides the interest you have identified.

<ul style="list-style-type: none"> What is the nature of your relationship with the individual? 	<p><i>The individual is a member of the LBH, either a captain or a player named on a participating team.</i></p>
<ul style="list-style-type: none"> Is any of the data particularly sensitive or private? 	<p><i>No.</i></p>
<ul style="list-style-type: none"> Would people expect you to use their data in this way? 	<p><i>Yes.</i></p>
<ul style="list-style-type: none"> Are you happy to explain it to them? 	<p><i>Yes, we explain it in our Privacy Policy and we draw their attention to this.</i></p>
<ul style="list-style-type: none"> Are some people likely to object or find it intrusive? 	<p><i>We think this is unlikely; details held on players is minimal and becoming a captain is wholly voluntary.</i></p>
<ul style="list-style-type: none"> What is the possible impact on the individual? 	<p><i>Captain's contact details are discoverable from the LBH website (but not automatically) for the purpose of arranging matches. Players' results in bridge games and ranks/grades arising from them, are published in bridge publications and websites.</i></p>
<ul style="list-style-type: none"> How big an impact might it have on them? 	<p><i>Minimal given the decision to engage in a competitive pursuit.</i></p>
<ul style="list-style-type: none"> Are you processing children's data? 	<p><i>No.</i></p>
<ul style="list-style-type: none"> Are any of the individuals vulnerable in any other way? 	<p><i>No.</i></p>
<ul style="list-style-type: none"> Can you adopt any safeguards to minimise the impact? 	<p><i>Data passed to the EBU may be screened by settings within their platforms.</i></p>
<ul style="list-style-type: none"> Can you offer an opt-out? 	<p><i>No. However, as above, data passed to the EBU may be anonymised.</i></p>

We assess LBH as having sufficient legitimate interests to proceed under that basis within the GDPR.

Signatories: