

Privacy Policy for London Business Houses Contract Bridge Association

Why does the Association need to collect personal data?

The London Business Houses Contract Bridge Association ("Association") collects and uses personal data for its administration, communication of information and organisation of bridge competitions and events.

What is the legal basis for collecting this data?

The Association collects personal data that is necessary for the purposes of its *legitimate interests* as a membership organisation and participant in an internationally recognised and regulated, competitive mind sport.

For some data, such as that relating to financial matters, the basis for its collection and retention is to comply with our legal obligations.

For data that may be made publicly available and which is not covered by the two bases above, consent will be sought and will provide the lawful basis for its processing.

What information is collected?

As defined in its Constitution, the Association's constituents are teams rather than individuals and it treats team captains and vice-captains ("Captains") differently from team members ("Players"). Personal data is collected from both.

Data is collected from Captains at the point (typically annually) at which they register their team with the Association:

- Name
- Email Address
- Telephone Number(s)

This data is held on the Association's website in an encrypted format to prevent automatic recovery. The Association asks and obtains consent from new Captains to publish their name, email address and telephone number on its website.

For both Captains and Players the Association collects:

- Name
- English Bridge Union ("EBU") Number

This data is also held on the Association's website under similar encrypted storage. The EBU Numbers of each Player are available online to their respective Captain, using a password.

For competitors in self-contained events the Association collects,

- Name
- Telephone Number
- Email Address
- Online Login/Username

This information is used to facilitate the running of the event and is not retained. It may be shared with external Tournament Directors in line with the Association's *legitimate interests*.

Players should be aware that for matches and events played online, logins will become public via cross-reference with the Association's records. To facilitate online matches, logins will also need to be shared with opponents.

What other information is retained?

Records of rankings and matches played in the Association's competitions are stored and displayed on the website.

After the completion of each season, for EBU Members only, Master Point awards are made by sending files to the EBU. Historical awards of Master Points are kept by the EBU and that information is available to the Association via its password-protected login. From an individual's EBU login, other competitors' Master Point awards are visible.

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

The Committee is responsible for ensuring compliance with the relevant laws and regulations. Day-to-day administration is the responsibility of the Results Secretary who alone is responsible for the Association's database and is answerable to the Committee.

How is the data stored and who can access it?

In addition to the storage on the website, a mirror-copy of the files is kept in digital form locally by the Results Secretary. An electronic database contains all the information above: it acts as a scoring program and generates the website files. Only the Results Secretary has access to the Association's database.

With whom is the stored data shared?

Unlike an EBU affiliated club, the Association cannot create EBU members and only shares name and EBU Numbers of EBU members with the EBU. This results information is passed to the EBU for use in its Master Point scheme. A Player can choose whether their Master Point awards are published or kept private by logging in to the EBU website and selecting the relevant privacy preferences.

Neither the Association nor the EBU passes a Player's personal data to third party organisations whether or not connected with bridge. The EBU has a privacy policy statement at <https://www.ebu.co.uk/gdpr/privacy-policy>.

For how long does the Association keep personal data, and why?

Aside from the active year, copies of the database are restricted to a single past year. The data, including any closed correspondence, is deleted after a maximum of two years. Minutes of Committee meetings and of AGMs are kept indefinitely.

A Captain's details are removed from the website once they stop being Captain. Players' details are retained as long as they remain on a Team roster. The Association normally keeps former Players' EBU Numbers (they are available from the EBU) to speed matching if a player resumes activity. However, the Association will delete any former Player's EBU Number on request.

Historical ranking lists and prize lists are archived and names cannot be removed from them even if a Player has died (see below).

What happens if a Captain or Player dies?

When a Captain dies all data is replaced on the website and contact made through either the new Team Captain or Vice-Captain, as in other situations where either the Team Captain or Vice-Captain steps down. The new Team Captain's/Vice-Captain's details are immediately available on the website.

The Association does not contact Players individually and takes no special actions when a Player dies. Results of Players are retained as part of the historical record of bridge played.

A Player should contact the Results Secretary if they have questions or requests.

Can a Player download their data to use elsewhere?

The data held by the Association, even public data, is not readily downloadable. Players who are EBU members can download session data pertaining to the Association (appearing as 'London Business Houses C.B.A.') by logging on to 'My EBU'.

A Player has a right to know the personal details that the Association holds about them. The nature of that data is fully outlined above. The Results Secretary will provide full details of the Player's data on receipt of a Subject Access Request.