

# Privacy Notice



[What personal data does English Bridge Education & Development \(EBED\) collect, and what is it used for?](#)

[Who is your data shared with?](#)

[Where does this data come from?](#)

[How is your data stored?](#)

[Who is responsible for ensuring compliance with the relevant laws and regulations?](#)

[Who has access to your data?](#)

[What is the legal basis for collecting this data?](#)

[How you can check what data we have about you?](#)

[Does EBED collect any “special” data?](#)

[How can you ask for data to be removed, limited or corrected?](#)

[How long we keep your data for, and why?](#)

[What happens if a contact dies?](#)

[Can you download your data to use it elsewhere?](#)

### **What personal data does English Bridge Education & Development (EBED) collect?**

The data we routinely collect includes contacts' names, addresses, email addresses and dates of birth. We collect this data directly from our teachers, bridge students and players in junior events (usually via their parents or guardians.)

For some of our contacts we may have additional information such as teaching qualifications, [DBS checks](#) done with their knowledge and permission, or tournament director roles.

We collect the scores from games in which contacts play, which are used in the EBU's National Grading Scheme (NGS) and the Master Point scheme.

For members of staff we collect personal data and maintain personnel records in line with statutory requirements and best practice.

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

We use contacts' data for the administration of our charity; the communication of information, including sending our magazines to those who choose to have printed copies of them; and the organisation of competitions and other events. We provide a limited amount of data for use by scoring programs to ensure that contacts' results are correctly attributed to them.

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

Contacts' data is shared with the English Bridge Union, (EBU), for whom we are their associated charity, and with whom we share offices and data systems.

A limited amount of information (name, EBU number, county, post town) is listed in the database made available for use by scoring programs. This will apply to contacts who play in junior or student events and allows the correct identification of players for scoring purposes.

Some of your data may be available for use by organisations that act as Data Processors on our behalf. They are not free to pass this on to other organisations that are not connected with EBED.

Your personal data is not provided by us for use by any organisations other than those indicated above, even if connected with bridge.

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

Data for most of our contacts comes directly from them, although some students' data will be submitted to us by their teachers.

Contact data can be updated directly in My EBU on the EBU website – [www.ebu.co.uk/members](http://www.ebu.co.uk/members) - using the assigned EBU number, or by contacting us and telling us what information needs to be updated. You can change this information in My EBU by going to Account -> My Details.

Scoring data from the competitions in which you play will be sent to the EBU electronically by the organisers 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 Pianola or Bridgewebs.

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

Most of our data, including our main database, shared with the EBU, is stored in digital form on computers, and we operate in “the cloud” using [Amazon Web Services](#) in compliance with the GDPR.

The remainder of our data is kept in the form of written documents stored in our Aylesbury offices.

## **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 EBED discharges its obligations under the GDPR is the Chief Executive Officer, Donna Wright, [donna@ebedcio.org.uk](mailto:donna@ebedcio.org.uk) .

She is the person who is responsible for maintaining a log of data breaches and notifying the ICO and any contacts affected as necessary, in accordance with our legal obligations.

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

Members of staff of the EBU and EBED have access to contacts' data in order for them to carry out their legitimate tasks for the organisations, such as responding to their enquiries.

Trustees of EBED will be given access to this data for any legitimate purpose to do with their roles as trustees, but will not be free to pass it on to any other organisation.

Organisers of events can access the EBU database that provides the limited [information necessary](#) for them to correctly identify players.

Sub-contractors of EBED may be given access to data for specific tasks, such as mailing copies of magazines on our behalf. They are not allowed to use it for any other purpose.

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

EBED collects personal data that is necessary for the purposes of its *legitimate interests* as a charity and as a body involved in organising and offering classes teaching bridge.

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

Similarly, personnel data is kept in compliance with our legal obligations.



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

If you want to see the basic data we hold about you, you can log in to My EBU on the EBU website and go to Account -> My Details. There you can also update most of your details or change the permissions you wish to grant for the use of your data.

You can contact us 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 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, though 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.

### **Does EBED collect any “special” data?**

The GDPR refers to sensitive personal data as “special categories of personal data”.

Of these categories, the only data we might record would relate to the disability of a contact when they have explicitly requested it to be recorded for the purpose of giving them stationary positions in competitions (which we aim to do wherever feasible). If you wish to change this data on your record you can do so at any time by contacting us – [info@ebedcio.org.uk](mailto:info@ebedcio.org.uk).

## How can you ask for data to be removed, limited or corrected?

There are various ways in which you can limit how your data is used.

- You could maintain your data with your correct name but with limited contact details. However, it is useful to have at least one method of contacting you. You could for example simply maintain an up-to-date email address, but of course this would limit what we are able to provide you with in the way of written information.
- You do not need to provide us with your date of birth unless you wish to enter age-limited (junior or seniors) events or gain concessions based on age.
- You may choose not to receive information emails from EBED (we do not send any out on behalf of other organisations).
- Any of these options can be implemented by logging on to My EBU on the EBU website, going to Account → My Details and editing your record there, either to correct erroneous data or to delete information you do not wish us to have. If you need any assistance with this contact us – [info@ebedcio.org.uk](mailto:info@ebedcio.org.uk).
- You may ask that any photograph of you that appears on the website be deleted by contacting us – [info@ebedcio.org.uk](mailto:info@ebedcio.org.uk).

## **How long we keep your data for, and why?**

We normally keep contacts' data until they ask us to delete it. This is because we find contacts sometimes later wish to re-awaken their contact with us or to join the EBU (occasionally after several decades). However, we will delete any contact's details entirely on request.

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 EBU's National Grading Scheme are not deleted although they will no longer be attributed to a player who does not want their data to be kept.

Historical ranking lists and prize lists are required for archiving purposes and names cannot be removed from them. Similarly, archived news articles, whether on the website, or in EBED's or the EBU's magazines (both printed and online), will not usually be deleted.

Other data, such as that relating to accounting or personnel matters, is kept for at least the legally required or recommended period – 7 years for financial transactions, 12 years after the final benefit for staff pensions.

## **What happens if a contact dies?**

If requested by their next-of-kin to delete it we will do so on the same basis as [when requested to remove data by a living contact.](#)

### **Can you download your data to use it elsewhere?**

Those who have played in any bridge competitions organised by EBED or the EBU can download a csv spreadsheet with data from all their sessions, including Master Points and NGS. This can be done by logging on to My EBU on the EBU website and in your Sessions list, clicking on "Download as CSV".