Privacy Notice for Manchester County Bridge Association

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**What personal data does Manchester CBA collect?**

The data we routinely collect includes members’ names, addresses, email addresses, telephone numbers, date of birth, NGS grade, and master point rank.We collect this data via the English Bridge Union (EBU), or from individual members when they join the county directly or enter competitions.

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

We use members’ data for the administration of your membership, the communication of information, and the organisation of events.

**Whom is your data shared with?**

Some of your data will be available for use by Bridgewebs acting as a Data Processor on our behalf, but this will be limited to your names and scores in any MCBA competitions you have entered. They are not free to pass this on to other organisations that are not connected with Manchester CBA.

Your personal data is not passed on by us to any other organisation, whether or not connected with bridge.

**Where does this data come from?**

Data for most of our members comes from them when they join an EBU affiliated clubor when they update their information either directly or via their EBU record. All that personal information is collected and collated by the EBU.

The EBU makes available to Manchester CBA the personal information held by them for any player who chooses Manchester as their primary county of allegiance. In addition, we hold data on anyone who enters a MCBA event or competition.

The information held by the EBU may be updated by your club if you have given it permission to change your record. You can change this permission on My EBU by going to Account -> My Details or by phoning the EBU office on 01296 317200.

The EBU will also make available to Manchester CBA the personal information of players who are direct members of the EBU who choose Manchester as their primary county of allegiance.

Manchester CBA does not have access to make changes to your record on the EBU database, so changes to it need to be made using My EBU, or through your club if they have permission to change your record, or by contacting the EBU directly.

**How is your data stored?**

This information is mainly stored in digital form on computers. Information is stored on the personal computers of MCBA officers. In particular, information is stored:

* on the personal computers of the Chair, Hon. Treasurer, League Secretary, Tournament Secretary and other competition organisers
* on the personal computer of the Hon. Secretary (email addresses only)
* on the personal computer of the Match Secretary (email addresses only)
* on the personal computers of other MCBA officers (email addresses only)

In all cases, these computers are password protected, but the data is not encrypted.

In addition, there is a DropBox to which the Chair, Membership Secretary, League Secretary and Hon. Treasurer have access. This DropBox is encrypted and no one apart from those mentioned has access to the data stored within it.

We use Bridgewebs to display the result of MCBA events. Data available is limited to names and scores in our competitions.

The EBU captures more personal information than Manchester CBA needs, and Manchester CBA only stores and uses the information it needs. The EBU makes the other personal information it has for Manchester CBA members available to Manchester CBA but this is not stored or controlled by Manchester CBA.

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

Under the GDPR (General Data Protection Regulation) we do nothave a [statutory requirement to have a Data Protection Officer](https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/accountability-and-governance/data-protection-officers/). The person who is responsible for ensuring Manchester CBA discharges its obligations under the GDPR is the Hon. Secretary of MCBA.

**Who has access to your data?**

Members of the Manchester CBA Committee have access to members’ data in order for them to carry out their legitimate tasks for Manchester CBA.

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

Manchester CBA 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.

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

If you want to see the basic membership data we hold about you, you should contact the Membership Secretary (membership@manchesterbridge.org.uk).

You can contact us with a “[Subject Access Request](https://ico.org.uk/for-the-public/personal-information/)” 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 Manchester CBA collect any “special” data?**

The GDPR refers to sensitive personal data as “special categories of personal data”. We do not record any such special data.

**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. The EBU stores data on you as detailed above and this is forwarded to the MCBA. MCBA has no control over this data and you should contact the EBU for this data to be removed, limited or corrected. Please refer to the EBU privacy policy for more information. MCBA receives no data from MCBA affiliated clubs and has no control over the data those clubs keep. Please contact your club(s) for this data to be removed, limited, or corrected. MCBA does collect and keep data on people who have entered a MCBA competition or event. Please contact the MCBA Hon. Secretary (secretary@manchesterbridge.org.uk) to have this data removed, limited or corrected.

Manchester CBA collects the vast majority of its members’ data via the EBU and Manchester CBA is therefore reliant on them for the accuracy and timeliness of that data. Members are encouraged to ensure that their details are accurately maintained with the EBU, but may additionally provide updates or requests for removal or deletion direct to Manchester if they wish.

**Data on children**

As required by law, we have considered the nature and extent of data we collect on children (defined as anyone under the age of 18 years), and the nature of MCBA’s legitimate interests. We collect no data on children other than detailed in the section “What personal data does Manchester CBA collect and what is it used for?” and our legitimate interests do not include any online or social media concerns. There is thus no need for Manchester CBA to make special provision for data collected on children.

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

We normally keep members’ data 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 entirely on request, as detailed above.

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

**What happens if a member dies?**

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 data by a former member.

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

Manchester CBA holds limited personal data and it is not possible to download this data. However, your session data that is held by the EBU can be downloaded as a csv spreadsheet. You can do this by logging on to My EBU and in your Sessions list, clicking on “Download as CSV”.