

## Questions & Answers



*This is a living document that will be updated and amended as more questions are received.*

- **We publish a list of all our members and their contact details in our club diary. Can we continue to do this?**

Since this would be outside of your club's *legitimate interests*, in the sense that it is not essential for the running of the club and would not be expected by new members, you would need another lawful basis, such as *consent*, in order to do this. You can find a document giving more detail about [consent](#) on our [GDPR webpage](#).

- **Like many other clubs with a Bridgewebs website, ours contains a full list of members, their emails, phone numbers etc which club members can access using a password via the Members Only tab. Is this still permissible under the new regulations?**

As in the previous case, you would need to get consent from each and every person to be included on the list. Once again, you should read the document about [consent](#) on our [GDPR webpage](#)

- **Where a club membership renewal date is after the 25<sup>th</sup> May does the club have to contact all members in advance and seek their permission re the use of their personal data to ensure compliance on the 25<sup>th</sup> May or can the club wait until their own renewal date ?**

You need to take all reasonable measures to ensure that your members know about your [Privacy Policy](#) before the 25<sup>th</sup> May. You should be able to reach most of them by email, by putting up notices at the club, or by information on your website. If you think there are any members who will not be reached by these methods, you should try to contact them by post or by phone. It would be wise to update your membership form as soon as possible to cover the new legislation and we have a [template form](#) available to download.

- **Do competition entry forms need to have the content amended ?**

Whenever you collect new data, you should give some information about why you are collecting that data, but it is legitimate to direct individuals elsewhere, such as to a Privacy Policy on your website, for fuller information.

- **The information sent to counties and clubs talks of clubs and counties being separate legal entities from the EBU. Many counties and most clubs are not legal entities at all.**

When we say that the clubs and counties are separate legal entities, it doesn't mean that they are all constituted within a legal framework such as a limited company, but that from a legal perspective they are distinct from the EBU. This means that they all have responsibility for compliance and can't just rely on being "part of the EBU".

- **For direct and student members the EBU currently gives the individual three months after their non renewal payment before removing them from the EBU database (and county list). Will the EBU be continuing this practice ?**

We state in the [EBU's Privacy Policy](#) that we retain members' data after they leave or their membership lapses, unless they ask us not to, and we give the reason for this. This is distinct from the grace period we give direct members for renewal before marking them as lapsed, which is a separate question outside the scope of the GDPR.

- **Our club has in the past had protracted problems with individuals, and these situations were discussed in email correspondence. Would these discussions need to be disclosed in answer to a Subject Access Request?**

There is not much change to this in the new regulation. It is already possible for a person to issue a Subject Access Request and you would have to comply with it. The main differences are that in future you will only have one month to comply, instead of 40 days, and you will not be able to charge them for providing this data in most cases. Suggestions for dealing with these matters would include not keeping emails for longer than necessary, and taking care that you would not be compromised by whatever you write being disclosed in response to such a request. Every time you write something about one of your members, remember that they are entitled to make a request to read it.

- **We have followed your [link to the ICO's self-assessment tool](#) and found we do not have to register as a Data Processor. Does this mean we don't need to do anything?**

No it doesn't mean that! You still have to comply with all the requirements of the GDPR, as outlined in our [information document](#).

- **Our county would like not to keep a database at all and just download information from My EBU as we need it. Can we do this?**

You can certainly do this, but you are still collecting and processing data during the period from when you have downloaded it until you delete it. So you do still need to comply with the GDPR, although you may find it convenient to follow this practice to reduce concerns about the security of your data.

- **Are photographs "personal data"?**

Yes, they are, so you would be advised to get permission from your members before using their photos on your website or in newsletters etc.

- **What should we do to ensure our passwords are effective?**

The main thing is to ensure that as few people as possible know your passwords. That means changing them whenever your committee changes, and not giving them to anyone else. You can identify club scorers so that they can upload results directly from their own My EBU and do not need to log in to the My EBU of the club.

Performing a web search for "strong passwords" will produce [useful articles like this](#).

- **We use our scoring program as our database. Are there any problems associated with this?**

All scoring programs contain some database capabilities, but many users store no more information in them than the minimum required to correctly identify EBU members. If you wish to use your scoring program as your primary database and store additional personal data in it, you will need to take as much care with it as if you had a separate database.

- **Our club keeps the names and phone numbers of members' next-of-kin in case of an emergency. Will this still be possible under the new regulations if they are stored in a secured place.**

This sounds like more information than can be assumed to be part of the club's "legitimate interests" so it would be best for you to ask for [consent](#) from those members, and from their next-of-kin, to ensure that both parties are happy for you to have, and store, this information. As always, you should take all reasonable measures to ensure the security of your members' data.

- **Is a standard computer password enough security for computer records? If full encryption is needed can you offer any advice on this?**

There is some information on passwords a bit higher up in this document. For encryption you should first consult the two documents issued by the ICO:

<https://ico.org.uk/media/for-organisations/guide-to-data-protection/encryption-1-1.pdf>

<https://ico.org.uk/for-organisations/guide-to-data-protection/encryption/>

If you do decide that you need to encrypt your laptop/PC, a search of the web should turn up helpful documents about how to do it, such as [this one](#).

- **Encryption seems a bit of a nightmare as far as selecting the appropriate product. Presumably the EBU will determine the product to be used for data transfer between clubs/Bridgewebs & Pianola/EBU. Does website encryption require a different product and is the EBU going to issue a list of approved encryption suppliers for use by Clubs?**

We are not offering advice or recommendations about this, but the answer above should provide you with some helpful information. When you upload your results to the EBU, whether directly or using Pianola, they are encrypted as standard. When you upload results to Bridgewebs they will be encrypted if your scoring program is designed to do so.

- **What do we need to do about guests visiting our club? Should we ask them to fill out a membership form.**

Providing they are members of the EBU, you shouldn't need to collect any more data from them than their name and EBU number, which should fall under the lawful basis of your *legitimate interests*. If you wish to collect more data from them than that, you should do so on a suitably-amended [club's joining form](#), which would draw their attention to your club's [Privacy Policy](#).