

Information about Data Protection for clubs and counties – updated July 2022

The General Data Protection Regulation came into force on 25th May 2018 and in preparation for it we issued this advice to counties and affiliated clubs. Following Brexit, the original EU GDPR was replaced by the UK General Data Protection Regulation (UK GDPR), tailored by the Data Protection Act 2018, but the substance of it as it applies to the EBU and its clubs and counties, remained the same.

You can find further information on the website of the Information Commissioner's Office at <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>.

Should you have questions relating to this document, please contact Gordon Rainsford gordon@ebu.co.uk. **Note that this document does not constitute legal advice and if you are concerned about any of these matters you should seek advice from the ICO or other specialists.** Clubs and counties in the Isle of Man and the Channel Islands will have different regulating bodies and should take care to ensure that any advice they take is applicable to their circumstances.

General information:

- All information you collect relating to your members is “personal data”. Keep it secure and only use it for the purpose for which it was collected. Do not pass it on to anyone unless that was explicitly part of the reason for collecting it – eg passing on membership details to the EBU for their EBU membership, or submitting scores for the NGS and Master Points schemes, are both purposes for which the data was collected.
- Information relating to guests is also “personal data” and covered by the same requirements as that of members, though likely to be more limited in scope.
- If you keep paper records they should be secure – if on club premises they should be locked, with a note taken of who are key-holders.
- If you keep your records on a computer, they should only be accessible by appropriate people – the computer and/or the folders in which they are contained should be locked and/or encrypted. There is more information about this available from <https://ico.org.uk/for-organisations/guide-to-data-protection/encryption/>
- Only committee members or club managers, if relevant, should have access to members' records. Passwords should be changed whenever these roles are filled by new people.
- Emails should not be sent to groups of people in a way that makes their email addresses visible. To avoid this, either use a mailshot program or blind copy (bcc) all the recipients.
- For committees where you would like them to be able to reply to all recipients to continue a discussion, it is acceptable to copy them all in the usual fashion providing they were told this when they joined the committee and they have been given the option to not be copied in this way. Any committee members who are concerned about this might be advised to have a separate email address just for the purpose of committee business. **Committee members' contact details should only be displayed on websites if they have specifically agreed to this.** It may be sensible for this information, if it must be available, to be in a password-protected area of the website, only available to members.

- **Clubs should not issue lists of members' contact details (telephone number and email address) to all their members.** Any such list that is made available should only contain the details of members who have specifically agreed to this. Any clubs that currently publish such a list should contact all members on it to ask whether they wish to remain on the list. They should be asked to “opt in” to this - it is not permissible for the default to be to include them unless they opt out.
- Access to a club’s or county’s My EBU is currently gained by using that organisation’s password. This means that any committee member who needs access needs to have the password, rather than accessing it through their own personal login. For this reason, you should keep the number of people who have access to the password to a minimum. You should change the password whenever any of those officers change.
- Scorers do not need to have access to the club/county My EBU in order to upload results – you can designate them as a scorer (as in the screenshot below) and then they will be able to submit results through their own personal My EBU without needing to access your club’s database. This is recommended to avoid having more people than necessary with access to your data.

The screenshot shows a web browser window with the URL `v.ebu.co.uk/members/v2/`. A modal window titled "Member Details: Gordon Rainsford" is open. The modal contains the following information:

EBU#	00105719	Record Permission	Minimal
Forenames	Gordon	Town	LONDON (W11)
Surname	Rainsford	Affiliation	LON

Below the form fields, there is a checked checkbox with the text: "Tick to make this member a scorer (they can submit results on behalf of the club)". At the bottom of the modal, there are three buttons: "Revoke Membership" (red), "Save Changes" (green), and "Cancel" (white).

- Do not keep data in more places than necessary – not only does this weaken your security, it also increases the possibility that the data will get out of sync and will not be consistent in different places. It is however sensible to have a backup of your data providing that you have a system to ensure it is backed up regularly and kept in a secure place.
- Many applications, such as your scoring program or a club management system like Pianola will have the ability to store significant amounts of data about your members, but unless you are using them as your primary database (and securing them appropriately), you should only store the minimum amount of essential information on them.

- Not all clubs and counties will need to register with the ICO but you can check on your particular circumstances at <https://ico.org.uk/for-organisations/register/self-assessment/> - you are likely to need to register if you use security cameras or if it is a proprietor club, but it is best for each club to check based on their own circumstances.

Specific information relating to the GDPR

- The legal basis on which you collect most of your data is likely be that it is in the organisation's "legitimate interest" to do so.
- You must inform everyone from whom you collect data:
 - The legal basis for doing so;
 - What data you collect;
 - How it is stored;
 - To whom you pass it on and for what purpose;
 - For how long you keep the data;
 - What they can do to limit how you use your data.

This will usually be done via a **Privacy Notice**, which may be on your club's website, but a printed copy should also be available in the club and be sent to those who request it. Your members should be directed to this Privacy Notice on every occasion when you collect data, so it should be referred to on your membership application forms. We will provide a template club membership form as well as a Privacy Notice for clubs and counties that you can modify to match your circumstances.

- **You need to take all reasonable measures to ensure that your members are aware of this, so you do need to contact them one way or another. While email is convenient, you should also contact those members for whom you do not have valid email addresses, if necessary by post.**
- Clubs act as Data Controllers with regard to their own data. They also act as Data Processors on behalf of the EBU, to whom they send members' contact data and game results. They may use other Data Processors, such as Bridgewebs or Pianola, in doing this.
- The EBU is the Data Controller with regard to its own data but also acts as a Data Processor for its counties, to whom it sends details of their members.
- Data Controllers and Data Processors need to have contracts as described in <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/accountability-and-governance/contracts/>. We are waiting for templates of these contracts to be made available by the ICO and they will need to be adopted as soon as they are.
- We intend to implement as much of the rest of our GDPR strategy as possible as soon as we can, rather than waiting until the ICO contracts are ready, and we advise clubs and counties to do likewise. The sooner we all start to implement this, the more time we will have to deal with unforeseen circumstances and work to resolve problems that may arise.
- We have a separate [document that answers questions](#) which have been raised by clubs and counties.