

## **WANSTEAD & WOODFORD CHESS CLUB PRIVACY NOTICE**

### **GENERAL**

The Wanstead & Woodford Chess Club (“the Club”) is a not-for-profit unincorporated members club promoting and engaging in chess leisure activity in the district of Wanstead & Woodford and more widely in Essex. It is a constituent body of Wanstead House Community Association (“WHCA”) where the Club is based, with our members being members of WHCA. The Club is managed by a Committee drawn from members. It runs chess events for those member organisations and for individuals. Adults and children participate in our events and teams.

The Club is affiliated to the Essex Chess Association (“ECA”) and its members are members of the ECA. We also participate in the North Circular Chess League, the London League and in national competitions run by the English Chess Federation (“ECF”). From time to time we engage in team competitions run by other organisations hosted by online platforms and internal competitions for individuals run by the Club hosted by online platforms. Our members are direct members of the ECF and the leagues in which we play are affiliated organisations to the ECF. The ECA is also a Membership Organisation for the ECF. The ECA acts as an agent of the ECF in collating the necessary information required of chess players to become a member of the ECF when requested to do so. The Club on behalf of those members who do not take out direct memberships with the ECF uses this facility to take out ECF membership for them so that they can play in our teams and in our internal events. The leagues in which we play and some online events require ECF membership as a condition of participation.

All of these organisations and WHCA receive personal information about you from the Club in order to facilitate your memberships of these organisations. That personal information takes the form of contact details and information to identify you as required, such as date of birth, rating reference and membership references. These organisations, the Club and you have a legitimate interest in this processing of your information. It is part of your membership contract with the Club and with these organisations, which you will expect to be the case. Gender and birth information provided is in the wider public interest in the data processing of the ECF which is explained further below. You are referred to the data protection policies and privacy notices of these external organisations as to their processing of your personal data.

The Club is also required to take attendance records by WHCA for health and safety purposes in which you have a legitimate interest and contractual obligations as members. The Club may also

be required from time to time to collate and retain attendance records as a matter of law; “Track and Trace” during the Covid-19 pandemic is an example of this.

The ECF has arrangements with many chess organisations in England and Wales for the rating of individual performances in competitions whether or not those individuals are direct members of the English Chess Federation. Those organisations have grading officers and we have arrangements with those graders to include our internal competition results in their rating (formerly grading) reports to the ECF, which also include the results from the team matches we play. Both the ECF and the world governing chess body, Fédération Internationale des Échecs (“FIDE”), protect personal information by allocating a unique individual reference for rating purposes and for international rating purposes this is known as a “FIN”.

For age restricted competitions, personal identification data of Junior players is protected by using a player’s rating reference and/or FIN for eligibility. For players who are not known to the national or international rating databases information of a more personal nature (such as a date of birth or parts thereof depending on the organisation) is required for eligibility purposes so that those external organisations can create a reference code in accordance with their data protection policies to protect data of a more personal nature. Once this has been created for a player we delete this additional personal information. Age and gender information is required by these external organisations as part of the process for allocating a rating reference or FIN and to facilitate the search functions on their public rating databases for the benefit of individual chess players. You are referred to the data protection policies and privacy notices of these external organisations as to their processing of your personal data.

From time to time it may be necessary to ask members for additional personal information as to residence for example to meet eligibility criteria for chess competitions and for prizes. Once we are satisfied as to eligibility that information is deleted, save for confirming the basis of eligibility, as we no longer have a need to retain it.

The national and international rating databases together with our results archive and the archives of organisations in whose competitions our teams participate in are kept in the wider public interest of having national and international systems to measure and record performance (including by reference to age and gender) as well as keeping a statistical historical record of chess played. Public interest also applies to the archiving of historical games and results by the organisations on whose platforms we play. Those who play in our competitions or for our teams have a legitimate interest and an expectation that:

- a) their names and, if necessary for eligibility purposes, some birth information, with the names of their opponents will be passed to the ECF for rating along with the results of their chess games (and usernames for relevant online competitions) either directly or through the organisers of the events our teams enter;
- b) ECF will supply information to us and leagues about participants from their ratings database, including name, grade, year of birth for junior players under the age of 18 on the 31<sup>st</sup> August, ECF rating reference and membership number;
- c) FIDE will supply information to us about participants from their international ratings database, including name, country of affiliation, rating, year of birth for junior players under the age of 18 on the 31<sup>st</sup> August, and FIDE reference;
- d) some additional personal information is necessary to ensure that eligibility criteria for competitions is met in the interests of fair play, e.g. platform usernames in online events.;
- e) the Club will maintain a statistical and historical archive of their results as will the organisations whose competitions are teams participate in or on whose platforms individuals play and the ECF in its grading database in a wider public interest.

As an organisation we are committed to protecting and respecting the privacy of all who participate in the running of the Club, our members and those involved in our competitions whether they be players, parents and guardians, carers or organisers.

For junior chess players we have a legal obligation to process their date of birth as from the age of 13 they can exercise their own privacy rights and so that we can ensure appropriate safeguarding for our teams and at our events. Junior chess players, their parents and guardians have an expectation and a legitimate interest in the fairness of age restricted competitions or prizes.

We supply to the organisations that run the competitions in which our teams play personal information about:

- a) our team captains, managers and organisers, which can include combinations of name, address, email and phone number; and

- b) our players including name, username for online events and where necessary for eligibility or ECF membership purposes county of origin, birth, gender and residence information.

We organise team and individual chess events for our members. We run representative teams in local, regional and national events, over-the-board and online. It is necessary to collect information to identify the players (including platform usernames for online events), maintain a record of results and pass that information to the organisers of those events and to the ECF for rating and to ensure eligibility to play criteria are met. It is also necessary to be able to contact participants through the contact information they supply to us.

Our members have a legitimate interest in participating in and being informed of our activities as well as about matters relating to their membership. We will seek prior consent of members if we send promotional material electronically to them.

**Wanstead & Woodford Chess Club is what is known as the “Controller” of the personal information that is provided to us by our member organisations or individuals. It can be contacted through the Secretary whose details appear on our website.**

The Club is registered with the Information Commissioner’s Office for insurance purposes.

## **WHY WE NEED YOUR DATA**

To be able to function as a member organisation we need to be able to communicate with other chess and community bodies. The Club, our members and these organisations have a legitimate interest in such communications including information about our activities. Personal contact details are required for this purpose.

To be able to function as a membership organisation for individuals we need to be able to communicate with our members. These individuals and the Club have a legitimate interest in such communications including information about membership and our activities. Personal contact details are required for this purpose. Promotional material about the activities of the Club and chess in Essex is provided on our website and by e-mail. Other than using platforms for the playing of online chess, we do not use other forms of social media. To receive promotional material by e-mail you must provide consent.

To be able to take out ECF memberships for individuals on request we need to be able to pass on

to the ECF through their agent the ECA the membership personal information they require of you. They, the Club and our members have a legitimate interest and expectation of this. Sensitive gender information is provided in the wider public interest to improve the representation demographic of women in chess. This is a stated policy aim of the ECF.

To be able to operate the Club under the terms of our Constitution the members of the two governing representative bodies (the Committee and the members in General Meeting) need to communicate with constituent members). The Club and those members have a legitimate interest in such communications. Personal contact details are required for this purpose.

To be able to organise chess competitions our organisers and officials need to communicate with each other and with the organisers of the external events we play in and organisers of opposing teams and to be able to contact members about competitions and events. The Club and these individuals have a legitimate interest in such communications. Personal contact details are required for this purpose.

Consequent to the above, the contact details provided to us by members and players may be used to contact them by mail, online chess platform messaging, telephone or e-mail for the above purposes of the Club.

Results of our internal and external competitions are usually submitted for rating by the ECF. This is usually done by our Grading Officer or event organiser. In submitting rating results to the ECF the competition graders are also what are known as “**Data Processors**” for the ECF. To be able to run competitions fairly, some of which have restrictions on entering according to age and/or rating, it is necessary to be able to identify participants, use their rating and results and forward information to the ECF for rating purposes. There are eligibility criteria for some competitions.

In the interests of fair play, it may be necessary to seek additional personal information (including platform usernames for online events) to satisfy ourselves and external organisations that players are eligible to play. It is also necessary for the Club, the organisations whose events our members participate in and the ECF to keep a historical statistical record of the chess played in events and for the more recent results to be publicly assessable from their respective websites. The Club and our members have a legitimate interest in these functions. Personal names, platform usernames and results and in some circumstances some birth or residence information and country of affiliation are required for these purposes.

## **WHAT WE DO WITH YOUR DATA**

All the personal information we process is processed by our officials according to their specific roles within the Club. Other than the ECF for membership and/or rating purposes, ECA and WHCA for membership purposes and the organisers of events in which our teams play, no third parties have access to your personal information unless it is required by law or is necessary for the role you have accepted, or you have consented to its public accessibility via our website or promotional literature.

Personal data relating to your chess results is publicly available on our website, the websites of the organisations in which our teams play and from the ECF rating websites (where results can be sorted according to age and gender). It is also archived for statistical and historical purposes as a permanent record. It is not possible to participate in our chess competitions if you object to this or to the passing of rating information to the ECF.

Our officials keep your personal information secure either on password protected systems or password protected files. The Secretary, Treasurer and Webmaster maintain central lists of contact details so that the Club can function as an organisation and officials can be contacted as appropriate. Other officials such as team captains and the tournament secretary keep contact details of those interested in playing for their teams or events.

## **HOW LONG DO WE KEEP YOUR DATA?**

Other than information relating your chess results we only keep personal information for as long as you are a member or as long as is necessary to establish eligibility for competitions or whilst we await an ECF rating reference. Attendance records are kept only for the prescribed periods. Thereafter data is deleted.

Members are responsible for keeping their own contact information up-to-date.

## **OUR WEBSITE**

Our website does not use cookies. Some websites will invite you to use cookies which take and store information from your computer to make it easier to use their sites. Websites should notify you when they do. We do not collect personal data simply as a result of visiting our website.

Our website may display photographs of individuals taken during our activities. The taking of

photographs at our events will be announced and is regulated in accordance with our safeguarding policy. Subjects may request that they are not portrayed or identified in any published material.

Our website may contain links to other websites. This privacy policy only applies to the use of our website. We cannot be responsible for other websites even if accessed via links to our website.

## **WHAT ARE YOUR RIGHTS**

Club members can ask for a copy of the data the Club holds about them. If at any point you believe the information we process on you is incorrect you can request to see this information, and have it corrected or deleted in some circumstances or withdraw consent for promotional material. Members have the right to ask the Club not to process their personal data. However, in those circumstances it would not be possible to continue membership.

If a Club member or official provides information about another person, it is their responsibility to ensure that the other person has given their explicit consent to the processing of their personal data.

If you wish to raise a complaint on how we have handled your personal data, you can contact us through the Secretary to have the matter investigated.

If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law, you can complain to the Information Commissioner's Office <https://ico.org.uk/>

## **SENSITIVE INFORMATION - SAFEGUARDING**

To comply with laws on safeguarding children and adults in need having regard to our safeguarding policy, for social protection and for the purposes of our public liability insurance we may need from time to time to process personal information relating to:

- persons we may wish to appoint whose role includes supervision of children and/or adults in need in the absence of a carer, parent or guardian
- individuals participating in our events

- persons raising safeguarding concerns at our events
- persons having a safeguarding need.

All safeguarding sensitive information is confidential and is processed according to our legal requirements. Confidential information is maintained securely by our safeguarding team on free standing password protected systems and/or password protected files. In some instances that information may need to be shared with one or more of the Executive, other safeguarding officers in other organisations, Social Services or the Police depending on the circumstances. Sharing of safeguarding information is governed by Law and is undertaken in accordance with our Safeguarding Policy. In extreme circumstances processing may also be in the vital interests of the individual or involve social care.

We also hold non-confidential information relating to safeguarding at our events, which includes personal information about our organisers and officials. This is a necessary part of being able to run events that may include junior chess players or adults in need. Similarly, it is necessary for our contacting team to be contactable by those participating in or spectating at our events. The Club, our officials and organisers, junior players, adults in need, carers, parents and guardians have a legitimate interest in the processing of this personal information, including contact details.

Some safeguarding documents are retained for legal purposes in the interests of our members, visitors and our organisers. This archive also serves as a data back-up and is kept securely by the Secretary.

## **CHANGES**

Any changes to this Privacy Notice will be announced on the Club's website.

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