

Privacy Policy of Blueshell E-sports

October 21, 2019, Enschede

Abbreviations:

GMM: General Members Meeting

UT: University of Twente

This document contains the privacy policy of Blueshell E-sports Association Enschede. For questions and/or complaints, you can always contact the board of the Association.

Data Register

Membership with additional profile information

Contract Type: Membership contract

Processing: Member administration, contribution collection, information provision, invitation to meetings, statistics

Processing by: Board of the Association

Retention Period: See paragraph X.

Security: Closed drive secured with two-step authentication.

1. *Membership Number*

The membership number is required for the completeness of the administration and for keeping statistics in conjunction with other data, such as the number of new members in the third year.

2. *Name*

The first name and surname are used to identify the member and are also required for matters such as collecting the payments.

3. *Initials*

The initials are used to identify the member and are needed for things like identifying bank payments.

4. *Email*

The member's email address is needed as the primary means of communication, for matters such as sending newsletters and important documents, convening the General Members Meeting (GMM), or informing about important matters and activities.

5. *Type of Member*

The type of member is tracked for the completeness of the administration. Statutory differences are present between primary members, donors, and honorary members.

6. *Address Details (street, house number, postal code, city)*

Address details are necessary for paper communication, such as invitations by mail.

7. *Phone Number*

The phone number serves as a backup medium for important matters where another medium is insufficient. An example would be calling a participant of an excursion who has not yet arrived.

8. *Groups*
For each member, it is recorded which groups (Board, Committees, Teams) they belong to. This information is used for making the committee drive accessible or for keeping statistics.
9. *Bank Account (BIC/IBAN)*
The bank account number is required for identifying payments and sending direct debit requests.
10. *Consent for Direct Debit*
It is recorded whether each member has granted consent for automatic direct debit collection.
11. *Student Number*
The student number is required for matters related to the University, such as applying for subsidies or linking to the UT login system.
12. *Date of Birth*
The date of birth is required for the completeness of the administration and for keeping statistics.
13. *Registration Date*
The registration date is required for the completeness of the administration and for keeping statistics.
14. *First Aid*
It is recorded whether a member has indicated that they hold a first aid certificate. This may be necessary for activities outside of the UT.
15. *Emergency Response (BHV)*
It is recorded whether a member has indicated that they hold an emergency response certificate. This may be necessary for activities at the UT.
16. *Payment Compliance*
It is tracked whether a member has complied with their payments, such as the membership fee or participant contribution for activities. In the case of outstanding payments, it is also recorded how much this is.
17. *Mailing List*
It is recorded for which mailing lists the member is registered, such as the newsletter or the active members mailing list.

Activity Form

Contract Type: Registration/Interest Form for Activity

Processing: Informing about the activity, activity administration, organizing activities

Processing by: Board of the Association, involved committees

Retention Period: See paragraph X.

Security: Closed drive secured with a password

Personal data marked with an (*) is not included in every activity form.

1. *Name*
The name is required for identifying the participant.
2. *Email*
The email address is required as the primary means of communication between the organization and the participant.
3. *In-game Name**
If necessary, the in-game name is used for organizing the game, such as inviting the participant for tournaments or custom games.
4. *Activity Preferences**
If desired by the organization, questions may be included in the registration form about the participant's preferences, for example, which parts the activity contains (tournament, free play).
5. *Available Resources**
If desired by the committee, participants may be asked about which resources (e.g., power strips) they would like to provide for the activity.

CRM

Contract Type: Issuing business cards, LinkedIn, email contact, verbal contact

Processing: Keeping track of CRM

Processing by: Board of the Association

Retention Period: See paragraph X.

Security: Closed drive secured with two-step authentication

1. *Name*
The name is required for identifying the contact person and for correspondence.
2. *Email*
The email is required for communication with the contact person.
3. *Working for which organization*
This information is required for identifying the contact person and the communication.
4. *Notes*
Notes contain relevant information regarding the contact or the contact person.

Discord

Contract Type: Accepting membership to Discord

Processing: Unstructured contact medium

Processing by: Board of the Association, members, guests

Retention Period: Until the concerned person decides to leave Discord

Security: Open Discord, where data marked with a * can be set by members at any time.

1. *Game Preferences**

Members can turn their game preferences on or off. By default, no game preferences are selected. These are used for statistics and serve for identification, for example, if another member is looking for people who enjoy the same game.

2. *Groups (Member, Committees, Teams)*

It is tracked on Discord which groups the member is part of. These are visible to other members and can be used for identifying the member on Discord, for example, for questions to a committee or team.

Retention Period

The retention period of data varies depending on the medium. The different situations applicable at Blueshell E-sports will be described below.

Membership

Membership data is not directly deleted from the database when a membership cancellation request is submitted. If a member cancels their membership during the academic year, the data will remain available until the end of the academic year. This is because members are required to pay the full year's contribution, and a half membership is not possible. Subsequently, the member will be assigned the status of 'removed member', where it is not possible to view member data except for student number, initials, first and last name, and the registration date of the member. After a member has been in the status of 'removed member' for 7 years, the statutory retention period concerning the tax authorities, the member's data will be definitively removed from the database.

Activity Form

Data from registrations will be retained for up to six months after the activity's conclusion. In cases of non-payment, this period may be extended, but otherwise, the data will be deleted after six months.

CRM

Data from the CRM will be retained as long as it is relevant. If a piece of data is no longer relevant, it will be deleted from the database within 1 month. Examples of non-relevant information include the name of a former contact person, notes that are merely on

Discord

Personal data on Discord will be removed when the member/guest decides to leave Discord. This is the member's choice and will not be influenced by Blueshell E-sports.

Provision of Data / Processor Agreement

Internal

Within the association, the necessary data is provided to the board, committees, initiatives, and working groups. The specific data shared with them will vary depending on the body, the moment, and the activity. Data will be provided for the purpose of tailoring activities to participants and compiling attendance lists. Currently, the full member administration is only accessible to the board.

External

ING

ING executes the direct debit requested by the association. This means there is an exchange of payment details between ING and Blueshell. The board of Blueshell has signed a processor agreement with ING stating the (privacy) rights and obligations of Blueshell and ING.

NBSE

NBSE is an association of E-sports associations in the Netherlands of which Blueshell is a member. We provide this association with the following member data: first name, surname, email, city, address. This data is used as proof of Blueshell's membership count and will not be shared with third parties. The membership count is used for Blueshell's voting rights within the association.

Outside the EU

Google Inc.

The administration of Blueshell is stored on Google Drive. This applies to committees, the board, and other organs of the association. Therefore, there is a constant exchange of data. The board of Blueshell has signed a processor agreement with Google Inc. stating the (privacy) rights and obligations of Blueshell and Google Inc.

Mailchimp

The info mail from Blueshell is sent via MailChimp. For this, the board provides email addresses and possibly first and last names to MailChimp. The board of Blueshell has signed a processor agreement with MailChimp stating the (privacy) rights and obligations of Blueshell and MailChimp.

Rights of Individuals

Right of Access

A member has the right to access their data at any time in accordance with Article 15 of the GDPR. Access to the data and processing purposes can be obtained by submitting a written request to the board. The board will then provide this access within 1 working day.

Right to Rectification

A member has the right to rectify incorrect personal data under Article 16 of the GDPR. A member can contact the board for this.

Right to Erasure

When an individual wishes to have their data erased, a request can be submitted to the secretary of Blueshell. They will then prepare the data for deletion. If there is still a (membership) debit to be carried out, the data will be temporarily retained. When such a debit is no longer necessary, the data will be definitively deleted. Data that must be retained for financial administration will be anonymized and kept for the legally required period.

Right to Restrict Processing

If an individual wishes to limit their data processing, a written request can be submitted to the board of Blueshell. The board will then delete the desired data from the member administration as legally permitted.

Notification Obligation

If rectification, deletion, or limitation has been applied, the individual will be informed of this. This will be done through a written message sent by email to the member.

Right to Data Portability

Individuals can request their data by contacting the board of Blueshell. In addition, an Excel export of all data known to Blueshell can be requested from the board of Blueshell.

Right to Object

Individuals can raise objections against data processing with the board of Blueshell. The processing of the data raised by the individual will then be stopped. When an individual raises an objection regarding the mentioned compulsory data, this will most likely result in the termination of membership or participation in the activity, depending on the data processing against which the objection is made.

Provision of Personal Data to Third Parties

Without your consent, the Association will only provide your personal data to third parties if this is necessary for the execution of the Agreement that the Association has with you, unless the Association is legally obliged to provide your personal data to these third parties. In the table at the beginning of the privacy statement, you will find an overview of the situations in which personal data is provided to third parties.

Access, Correction, and Deletion of Personal Data

You have the right to request the Association for access to your personal data (unless the Association is not obliged to provide access under the General Data Protection Regulation (GDPR)) and to have your data supplemented, deleted, or blocked. You will need to identify yourself for such a request. If you wish for your data to be deleted, the Association will communicate this deletion to all other organizations that have received the relevant data from the Association.

Security of Personal Data

The Association takes appropriate measures to protect your personal data against loss, unauthorized access, publication, and unlawful processing. We ensure that only necessary persons have access to your data, that access to the personal data is protected, and that our security measures are regularly checked.

Links to Other Websites

The website may contain links to other websites. This Privacy Statement applies only to the websites of the Association. Other websites may have their own privacy policies. The Association recommends that you always consult the relevant privacy statement of those websites before using them.

Amendment of the Privacy Policy

The Association will occasionally update its privacy policy to keep it current. The most recent version of our Privacy Statement will always be included on the websites. The Association recommends that you regularly consult the Privacy Statement. In case of significant changes, the Association will do its utmost to inform you by email and via the websites.

Data Breaches

In the event of a data breach, the board of Blueshell will inform the affected members within 72 hours of discovering the breach. In the meantime and subsequently, the board will investigate where the breach may have occurred and how a similar breach can be prevented in the future.

Contact Information

If you have questions about the processing of your personal data or if you wish to request access, correction, and/or deletion of your personal data, you can contact us using the contact information below:

Responsible: Board of Blueshell E-sports
Email: blueshellesports@gmail.com

Complaint about the Processing of Your Personal Data

Of course, we are also happy to assist you if you have a complaint about the processing of your personal data. Under the GDPR, you also have the right to lodge a complaint with the Authority for Personal Data about our processing of your personal data. You can do so by contacting the Authority for Personal Data.

