

ICCF Privacy Notice

Effective from 1st January 2019

Introduction

This notice provides information about the use of personal information while you are a correspondence chess player or an official registered with the International Correspondence Chess Federation (ICCF) and how we retain your information after you have stopped playing. If you fall into either of these categories, then you are a “data subject” for the purposes of this notice.

The General Data Protection Regulation (GDPR) is a regulation in European law which states that we are only able to process your personal information if we have valid reasons to do so. Processing your personal data includes, but is not limited to, collecting information about you, running correspondence chess tournaments, managing your registrations to tournaments, managing suspensions, etc. and contacting you.

If you are an ICCF official, you also have certain legal responsibilities to protect the personal information of chess players or other officials, by handling it appropriately.

What is ‘personal information’ (also known as ‘personal data’)?

‘Personal information’ means any information about you from which you can be identified, either from that information alone or taken together with other information. It does not include data where your identity has been removed and where you can no longer be identified (anonymised data).

We will ask you to give your consent to our use of your personal information whenever there are any changes to this document.

It is important that the personal information that we hold about you is accurate and current. Please keep us informed if your personal information changes.

What is ‘sensitive information’?

Sensitive information are data consisting of racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning a living individual’s sex life or sexual orientation. ICCF will never collect, store or process sensitive information about chess players or any other individual.

How do we collect personal data from you?

We receive information about you from you when you register as a chess player on our website. We might also collect information about you from your ICCF national federation. We collect information from you when you enter tournaments or contact us about any other matter.

Your personal data may be automatically collected when you use our services, including but not limited to, your IP address or information about your device.

What personal data about me do you make public?

We store a unique ID number, your name, your rating history, any chess titles you have achieved, your national federation or country, your chess games, and the crosstables of any tournaments you have played in; this information is openly available in our public records.

Why do you need to make this information public?

Your chess games and tournaments are a public record for all chess players. Your name, national federation, rating and title will be listed on the public ICCF rating lists, your tournament crosstables and your chess games.

Who has access to public information about me?

Any visitor to the ICCF website can view this information; it will also be attached to chess games and rating lists downloaded from the ICCF website.

Who do you share this information with?

Access is open, anyone may download a database of chess games from the website, and these games may be included in commercial and non-commercial databases of chess games.

Can I remove this public information from your records?

If you have never played a chess game with ICCF then please email helpdesk@iccf.com and we will remove all these data from our database. However, if you have participated in an ICCF tournament, your chess games represent a public historical record which is in the general interest of all chess players, and we will not remove this basic information unless required to do so by law.

Email address

Why do you need my email address?

We use your email address for several reasons:

- The ICCF server will send you various notifications when you are playing in a chess tournament. For example, we will send you a copy of the start list when the tournament starts, and we can optionally send you notifications about your opponents' moves. If one of your opponents withdraws, we can send you information about adjudications, etc.;
- We will occasionally send you notifications about new tournaments which we think you might find of interest. You can opt out of these emails;
- We will occasionally send you information from our commercial partners about products we think you might find of interest. You can opt out of these emails. Please note that these emails are sent by ICCF on behalf of our commercial partners, we do not share your email address with our partners;
- ICCF officials or officials from your national federation may use your email address to contact you.

Who has access to my email address?

- The ICCF server administrator,
- Officials of your national federation or your zonal director if you are not affiliated to a member federation,
- The tournament organiser and director of any tournaments in which you are currently playing.

We will never share your email address with a third party.

How can I stop receiving marketing emails?

We send you these emails because we believe that you have a legitimate interest in announcements about chess tournaments and services. However, if you do not wish to receive them in the future, please visit your profile page on iccf.com, where you can opt out of marketing emails by checking the last two boxes on the form.

Can I remove my email address from your records?

If you wish to remove your email address from our records, please email helpdesk@iccf.com and we will remove your email address, password and all personal preferences and settings from our database. However please note that if we remove your email address from our database, you will no longer be able to participate in server correspondence chess tournaments.

Postal address

Why do you need my postal address?

ICCF runs postal correspondence chess tournaments. We need your postal address if you wish to play in these tournaments. If you do not wish to play in postal correspondence chess tournaments, then there is no need for you to enter this information.

Who has access to my postal address?

- The ICCF server administrator, and
- The tournament organiser and director of any postal tournaments in which you are currently playing.
- We will share your postal address with your opponents if you enter a postal correspondence chess tournament.

How can I remove my postal address from your records?

You can remove your postal address from our records at any time, from the “My Details” section of the website, but please note that you will not be able to enter postal correspondence chess tournaments if you do not have access to your postal address.

Gender

ICCF and our member federations occasionally run tournaments for ladies only. If you register for ladies only tournaments, you will be asked to confirm that you associate with the female gender before your registration can be completed. We will not store this information in our database and will never require you to disclose your gender for any other reason.

Date of birth or age

ICCF and our member federations occasionally run tournaments for specific age groups (for example veterans', or juniors' tournaments). If you register for an age restricted tournament, you will be asked to confirm that your date of birth is before or after a particular date before your registration can be completed. We will not ask you for your exact date of birth and we will not store this information in our database. We will not require you to disclose your date of birth for any other reason.

Photograph

You can upload your photograph to the website. This is approved by the ICCF Marketing Director before being displayed online.

Why would I upload my photograph?

This is one of the social features of the ICCF website. It is not a requirement.

Who can see my photograph?

Your photograph is available to any online visitor to the ICCF website.

Can I remove my photograph?

Yes, there is a button beneath your photograph which allows you to permanently remove it from the ICCF website.

Chess games

Why do you need to keep my chess games?

Your chess games are a part of the history of ICCF and hold a public interest for all chess players.

Who has access to my chess games?

Anyone who visits the ICCF website can look at or download your chess games. We also provide chess games to commercial partners for their databases.

Some ongoing games have restricted viewing access (for example there may be a live move delay, or some games in a tournament may not be publicly viewable until a number of games have been completed in the tournament).

Can I remove my chess games from your records?

No, your chess games cannot be removed from the ICCF database.

What about private discussions with my opponent?

The ICCF website has a feature which allows you to continue a conversation with your opponent. This conversation is normally completely private and only visible to you and your opponent (this conversation is stored on the server, you are not required to disclose your email address to your opponent).

If you complain about something your opponent has written (or if your opponent complains about something you have written), then the tournament director will automatically be granted access to read the conversation.

If you wish to have all your private conversations removed from the ICCF database, please contact helpdesk@iccf.com to make this request. We will delete the comments which you have written in all your games, providing there are no outstanding complaints.

Other information we store

We store information about your registrations for tournaments, your activity whilst playing a tournament, financial transactions (although not any credit card details, etc.), records of your titles and achievements, suspensions, etc. This information is necessary for us to apply the rules and procedures of correspondence chess as determined by the ICCF Congress and is in the general interest of all players.

ICCF does not store any 'special category' personal data, defined as racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health or sex life and sexual orientation, genetic data and biometric data which is processed to uniquely identify a person or any personal information relating to criminal convictions and offences.

Visits to the server

A log is kept of all visits to the server. This log includes your ICCF ID number, your IP address, and the webpage you visited.

What do you use this information for?

We use this information for diagnosing problems with the server, and occasionally to support player appeals.

How long do you keep this information for?

Server logs older than 30 days are deleted weekly.

What happens when I click a sponsor logo?

We record clicks on sponsor logos for marketing purposes. These data will be anonymised and will include your correspondence chess rating. The summary data we share with our commercial partners will be anonymised and aggregated.

Cookies

In common with many websites, ICCF use 'cookies'. Cookies are small text files stored on your computer. Cookies help us to identify you when you visit the site (for example to allow us to show you your own list of games, etc.).

How long do you keep my personal information?

If you have never started a chess game, we will permanently remove all your personal information from our database two years after the date of your registration in our database.

If you have started a chess game, we will remove your email address, postal address, and personal preference settings from our database five years after the date of your last activity; we will keep your ICCF ID number, national federation affiliation, name, and your chess games and tournaments for ever, as these represent part of the history of correspondence chess and hold a significant historical interest for all chess players.

Where are the data stored?

The ICCF database is hosted on a secure server located in the United Kingdom.

Do you export data outside the United Kingdom or European Union?

Public data (for example games, rating lists, etc.) may be downloaded from the website from anywhere in the world. All data contained in the server database is backed up on a cloud service located in the European Union.

How do I make a complaint about the way ICCF has used information about me?

Please contact your national federation delegate in the first instance. If you are unable to resolve your complaint, you should contact the UK Information Commissioner's Office (ICO)

<https://ico.org.uk/concerns>

Who is the ICCF data controller?

ICCF controls and is responsible for personal data and as an organisation is the data controller for all personal information stored and processed by the ICCF database. For all matters concerning privacy and data protection, ICCF is represented by the ICCF President and the ICCF Services Director.

What if I fail to provide personal information?

We require you to provide us with any information to achieve one or more of the purposes described above, for example to enable us to administer correspondence chess tournaments. If you fail to provide certain information when requested, this will hinder our ability to administer tournaments, which may prevent you from entering or playing in tournaments.

How does ICCF protect personal information?

ICCF takes the security of your data seriously. We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

In addition, we limit access to your personal information to those officials who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

What are my rights in connection with my personal information?

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing.
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact helpdesk@iccf.com.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

If you would like to exercise any of these rights, you should contact helpdesk@iccf.com.

Who can I contact if I have any queries?

If you have any questions about how your personal information is used by ICCF, or wish to exercise any of your rights, please consult helpdesk@iccf.com

Are changes made to this notice?

This privacy notice was last updated by the ICCF Congress in August 2018. This notice may be updated at any time by the ICCF Executive Board, and we will provide you with a new privacy notice when we make any substantial updates. Furthermore, we will require any ICCF officials who have access to your personal information to acknowledge that they have read and understood these changes. We may also notify you in other ways from time to time about the processing of your personal information.

Information for ICCF Officials

What personal data do I have access to?

As an ICCF official, you may have access to personal data about players. This may include their email address or their postal address. GDPR places specific legal responsibilities on you as a “data processor”.

What is reasonable use of these data?

You may only use personal data about players for the purposes described in this document. Any other use of personal data may be considered a data breach and may expose you personally, ICCF, or your national correspondence chess federation to legal action and possible fines.

Examples of unreasonable use include:

- Sending an email to multiple recipients without using the BCC facility,
- Sharing information with external partners,
- Using contact details to send emails not related to one of the purposes described in this document.

Before being given access to individual personal information, you will be required to confirm electronically that you have read and understood this document, and that you agree to process personal data according to the provisions set out in this document. You will be asked to repeat this confirmation following any changes to the document.

Please note that personal data is not limited to information stored on the ICCF server; you may for example keep lists of tournament entries, or emails from players containing personal information.

You must *only* keep this information for as long as you need it for the purposes described in this document and delete the information when it is no longer required.

What information do you store about me?

As an ICCF official, we store some information about you in addition to the information we store about players. For example, we may store information about your role within the organisation, or the results of your TD review tests, etc.

This information is stored and used in the general interest of all players and cannot be removed whilst you are active as an ICCF official.

We may also allow visitors to the ICCF website to contact you directly by email. We normally do this using a contact form rather than revealing your email address.