



Privacy Policy Review

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ACBL's Privacy Policy Is Codified

- ◆ Privacy Policy and Terms of Use are located in Appendix 2-B of the Codification.
- ♣ Since the Board has not historically reviewed the Privacy Policy, non-substantive changes to it periodically have been made by management.
- ♣ The policy was last updated in April 2015.

Policy Generally Fine

- ◆ Changes have occurred in privacy practices since the current policy was updated. It seemed a good idea review the current policy.
- ◆ Outside counsel confirms the policy is “within the boundaries of good practice”
 - ♣ Some issues of wording or clarity were recommended, e.g. we use cookies.
 - ♣ Some language should be clarified.

Terms of Use Need Work

- ◆ Terms of Use are agreed to by all members. They are also within the boundaries of good practice.
- ◆ However, the Terms are not concise or clear and they contain redundancies.
- ◆ One result of this poor presentation of the Terms is that they are not being properly followed by those who use member data.
 - ♣ Need to clarify/simplify the Terms.
 - ♣ Need to educate users about privacy issues.

Need to Uniformly Enforce Terms

- ◆ Terms of Use are not being uniformly followed by clubs, Districts, Units, teachers, and other ACBL affiliates.
 - ♣ Need to upgrade technology so that it better protects PII.
 - ♣ Need to clarify/simplify the Terms of Use so that they are easier to understand.
 - ♣ Must stop some practices and educate users about privacy issues.
- ◆ Result should be happier members and less risk of a privacy-related future problem.

Summary of “the rules”

- ♥ We are required to follow general rules:
 - ♣ Personally identified information (PII) of our members is owned by them, must be protected, and must not be used in unauthorized ways.
 - ♣ PII should only be used for performing “bridge-related operations.”
 - ♣ ACBL can share PII with clubs, Units, Districts, the Board, and NBOs but sharing should be limited as above.
 - ♣ ACBL can share PII with ACBL employees so they can perform their job functions.

Examples of Issues

- ♥ More PII is being shared than is required for a particular purpose.
- ♥ Members can't control whether or not some of their PII is shared.
- ♥ Some affiliates are demanding PII they do not have the right to use/need.
- ♥ Some PII has been shared with software vendors and TAs without asking them to keep it confidential.

Tech Limits Are Part of the Problem

- ♠ Standard member data “exports” include not-required information such as street address, city and state.
- ♠ Hard to change these “hard coded” reports. ACBL score has special powers to extract data we cannot change.
- ♠ New CRM will allow revamp of controls and new user options. We must educate data users on new limits.

Must Clarify What PII Can Be Shared

- ♠ Need clear rules on how data is shared.
 - ◆ Cross Unit/District sharing must be reduced to only what is necessary.
 - ◆ Legitimate needs outside of current policy must be approved by management.
 - ◆ Teacher & club access must be through a program that carefully limits use.
 - ◆ Members may need to reapprove (opt in) certain uses once new technology is in place.
- ♠ CRM and new email technology system will help implement these changes.

Examples

- ♥ Can we publish both a player's current result and total masterpoint[®] balance?
- ♥ Can we publish a player's city and state?
- ♥ Should we allow teachers or clubs to "solicit" members.
- ♥ Should a Unit be allowed to access data on members in another Unit?

The answer to these questions will be "yes" only if we tell members what we are doing and have a business reason for doing it.

There Is A Tech Element

- ♥ Need to start migrating off ACBL score and to more modern and PII-aware programs.
- ♥ Must supply marketing software (email and mail support) to clubs and teachers that are PII-compliant.
- ♥ Need to keep our web site “certified” as conforming to privacy rules. *If we lose this status, we can't take credit card sales!*
- ♥ Must build interfaces for our systems that filter the member data we give partners.

Must Stop Passing Around PII

- ♠ All parts of ACBL must be responsible for following the Privacy Policy and Terms of Use.
- ♠ HQ needs to implement audit policies to ensure that PII is not being misused.
- ♠ If a misuse of PII is detected, HQ must take action to correct it. Districts, Units, clubs, and teachers must comply with HQ requests.

Next Steps

- ◆ HQ will circulate revisions of Policy and Terms of Use (drafts are attached).
- ◆ After integrating comments, HQ will start implementing the new policy (probably early in 2018).
- ◆ HQ will provide training and new systems to guide proper use of PII.
- ◆ HQ will vigorously enforce the Terms of Use, improve vendor licenses and require NDAs from non-employees.

There Will Be Complaints

- ◆ Some things that were done before, won't be possible now.
- ◆ To compensate for the restrictions, HQ must offer more support for marketing emails and other outreach efforts.
- ◆ We may introduce formal training on PII use. One way to encourage users to train may be to refuse to share PII with those who don't.