



## **Carnoustie Golf Links – Community Benefits Privacy Notice**

### **Data Controller: Lee Bowen**

Carnoustie Golf Links collects and processes personal data relating to all applicants to the Community Benefits Programme to manage the application process. We are committed to being transparent about how we collect and use that data and to meeting our data protection obligations.

### **What information does Carnoustie Golf Links collect?**

Carnoustie Golf Links collects and processes a range of information about you. This includes:

- your name, address and contact details, including email address and telephone number, date of birth and gender;
- details of your bank account;
- your bank account statements, in conjunction with your application

Carnoustie Golf Links collects this information in a variety of ways. For example, data is collected through application forms; from forms completed by you at the start of or during the application process; from correspondence with you; or through interviews, meetings or other assessments.

Data is stored in a range of different places, including in your application file, in Carnoustie Golf Links' systems and in other IT systems (including Carnoustie Golf Links' email system).

### **Why does Carnoustie Golf Links process personal data?**

Carnoustie Golf Links needs to process data to enter into an application process with you. For example, we need to process your data to conduct a just and fair application and scoring process, ensuring all relevant information is obtained to conduct an assessment on your application. Information is also collected to provide any payments, if successful in the application process.

In other cases, Carnoustie Golf Links has a legitimate interest in processing personal data before, during and after the end of the application process. Processing employee data allows Carnoustie Golf Links to:

- run historic reports on the application and grant process, including amounts and payees;
- maintain accurate and up-to-date records and contact details;
- ensure effective general HR and business administration;
- respond to and defend against legal claims; and
- maintain and promote equality in the community benefits process.

### **Who has access to data?**

Your information will be shared internally, including with members of the HR Department, Executive Office, Board of Trustees, and if successful in the application process, the Finance Department.

Carnoustie Golf Links may also share your data with third parties in the context of a sale of some or all of its business. In those circumstances the data will be subject to confidentiality arrangements.

Carnoustie Golf Links may also share your data with third parties that process data on its behalf, in connection with payroll.



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Carnoustie Golf Links will not transfer your data to countries outside the European Economic Area.

### **How does Carnoustie Golf Links protect data?**

Carnoustie Golf Links takes the security of your data seriously. We have internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the performance of their duties.

Where Carnoustie Golf Links engages third parties to process personal data on our behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

### **For how long does Carnoustie Golf Links keep data?**

Carnoustie Golf Links will hold your personal data for the duration of your application and for the duration of the Community Benefits Programme, for reporting and historical data purposes.

### **Your rights**

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require Carnoustie Golf Links to change incorrect or incomplete data;
- require Carnoustie Golf Links to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where Carnoustie Golf Links is relying on its legitimate interests as the legal ground for processing; and
- ask Carnoustie Golf Links to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override Carnoustie Golf Links' legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact the Data Controller. You can make a subject access request by completing Carnoustie Golf Links' form for making a subject access request.

If you believe that Carnoustie Golf Links has not complied with your data protection rights, you can complain to the Information Commissioner.

### **What if you do not provide personal data?**

You have some obligations under the application process to provide Carnoustie Golf Links with data. You may also have to provide Carnoustie Golf Links with data in order to exercise your statutory rights. Failing to provide the data may mean that you are unable to exercise your statutory rights and complete the application process.

Certain information, such as organisational details, finances and contact details, have to be provided to enable Carnoustie Golf Links to enter the application process. If you do not provide other information, this will hinder Carnoustie Golf Links' ability to administer the rights and obligations arising as a result of the application process efficiently.