

The policy: This privacy policy notice is for this website; [www.castlestuartgolf.com] and served by [Castle Stuart Golf LLP, Kinburn Castle, St Andrews, KY16 9DR] and governs the privacy of those who use it. The purpose of this policy is to explain to you how we control, process, handle and protect your personal information while browsing or using this website, including your rights under current laws and regulations. If you do not agree to the following policy you may wish to cease viewing / using this website.

Policy key definitions:

- "I", "our", "us", or "we" refer to the business, [Castle Stuart Golf LLP].
- "you", "the user" refer to the person(s) using this website.
- GDPR means General Data Protection Act.
- PECR means Privacy & Electronic Communications Regulation.
- ICO means Information Commissioner's Office.
- Cookies mean small files stored on a user's computer or device.

PROCESSING OF YOUR PERSONAL DATA

Under the GDPR (General Data Protection Regulation) we control and / or process any personal information about you electronically using the following lawful bases.

- **Lawful basis:** Consent
The reason we use this basis: The customer contacts us to make a booking and we ask for consent to keep the data.
We process your information in the following ways: We capture name and address details as well as payment details for the purposes of processing a golf booking.
Data retention period: We will continue to process your information under this basis until you withdraw consent or it is determined your consent no longer exists.
Sharing your information: We do not share your information with third parties.
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- **Lawful basis:** Contract
The reason we use this basis: The customer enters into a contract with us when making the booking.
We process your information in the following ways: We capture name and address details as well as payment details for the purposes of processing a golf booking.
Data retention period: We shall continue to process your information until the contract between us ends or is terminated under any contract terms.
Sharing your information: We do not share your information with third parties.
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- **Lawful basis:** Legal obligation
The reason we use this basis: We hold the data relating to a booking in accordance with HMRC requirements.
We process your information in the following ways: We capture name and address details as well as payment details for the purposes of processing a golf booking.
Data retention period: Seven years.
Sharing your information: We do not share your information with third parties.
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If, as determined by us, the lawful basis upon which we process your personal information changes, we will notify you about the change and any new lawful basis to be used if required. We shall stop processing your personal information if the lawful basis used is no longer relevant.

YOUR INDIVIDUAL RIGHTS

Under the GDPR your rights are as follows. You can read more about [your rights in details here](#);

- the right to be informed;
- the right of access;
- the right to rectification;
- the right to erasure;

- the right to restrict processing;
- the right to data portability;
- the right to object; and
- the right not to be subject to automated decision-making including profiling.

You also have the right to complain to the ICO [www.ico.org.uk] if you feel there is a problem with the way we are handling your data.

We handle subject access requests in accordance with the GDPR.

INTERNET COOKIES

We use cookies on this website to provide you with a better user experience. We do this by placing a small text file on your device / computer hard drive to track how you use the website, to record or log whether you have seen particular messages that we display, to keep you logged into the website where applicable, to display relevant adverts or content, referred you to a third party website.

Some cookies are required to enjoy and use the full functionality of this website.

We use a cookie control system which allows you to accept the use of cookies, and control which cookies are saved to your device / computer. Some cookies will be saved for specific time periods, where others may last indefinitely. Your web browser should provide you with the controls to manage and delete cookies from your device, please see your web browser options.

DATA SECURITY AND PROTECTION

We ensure the security of any personal information we hold by using secure data storage technologies and precise procedures in how we store, access and manage that information. Our methods meet the GDPR compliance requirement.

TRANSPARENT PRIVACY EXPLANATIONS

We have provided some further explanations about user privacy and the way we use this website to help promote a transparent and honest user privacy methodology.

EMAIL MARKETING MESSAGES & SUBSCRIPTION

Under the GDPR we use the consent lawful basis for anyone subscribing to our newsletter or marketing mailing list. We only collect certain data about you, as detailed in the "Processing of your personal data" above. Any email marketing messages we send are done so through an EMS, email marketing service provider. An EMS is a third-party service provider of software / applications that allows marketers to send out email marketing campaigns to a list of users.

Email marketing messages that we send may contain tracking beacons / tracked clickable links or similar server technologies in order to track subscriber activity within email marketing messages. Where used, such marketing messages may record a range of data such as; times, dates, I.P addresses, opens, clicks, forwards, geographic and demographic data. Such data, within its limitations will show the activity each subscriber made for that email campaign.

Any email marketing messages we send are in accordance with the GDPR and the PECR. We provide you with an easy method to withdraw your consent (unsubscribe) or manage your preferences / the information we hold about you at any time.