



TRUMP  
ABERDEEN  
SCOTLAND

## PERSONAL DATA PROCESSING NOTICE

### NOTICE OF PROCESSING OF PERSONAL DATA

This notice ("Notice") serves to inform you of the personal data that we collect and process in connection with your application for employment with Trump International Golf Club Scotland Limited (the "Company").

### PERSONAL DATA WE COLLECT

In connection with your application for employment with the Company, and depending upon the nature of the position to which you apply, we may collect the following "Personal Data": your name, birth date, gender, email address, phone number, home address, prior employment history, education history, skills, experience, disability status, citizenship/immigration status, references from previous employers, information about your entitlement to work in the UK, any information you voluntarily elect to provide to us without our request and other information that is that is capable of identifying you personally. We will process the Personal Data for the application process. The legal basis for this processing activity is Art. 6 (1) 1 lit b of the European General Data Protection Regulation ("GDPR").

We may also collect personal data about you from third parties, such as, for example, references you provide, or vendors that perform employment background checks. In the event we collect such information, we will only process the Personal Data for the application process. The legal basis for this processing activity is Art. 6 (1) 1 lit. a GDPR and Art. 10 GDPR in conjunction with the respective national regulations.

We may also through closed circuit television and other security measures, capture or record images or audio of you in public areas of our properties if you are asked to attend an in-person interview on our properties, for your protection and that of our guests and employees, including to prevent theft, violence and other crimes and ensure compliance with health and safety rules.

We may have access to, though we try not to collect, "Sensitive Personal Data," which includes: information about your racial or ethnic origin, religious, political or philosophical affiliations, genetic or biometric data, trade union membership(s) or information about your health. We may also collect information about your health and any disabilities you have in order to provide you with proper accommodations at the work place.

We may collect this information about you in a variety of ways, including from your CV, resume, job application or other identity documentation (e.g., license, passport) you provide, or during the course of your interview or other evaluation. The legal basis for this processing activity is Art. 9 (2) lit. b GDPR in conjunction with the respective national requirements.

## **PERSONAL DATA PROCESSING, RETENTION & SHARING**

We process your Personal Data as necessary for us to evaluate and verify your employment application and to provide you with services necessary to onboard you as an employee, should you receive and accept a job offer from the Company. For example, we may need to process your information to ensure you are eligible to work in the UK before your employment commences. The legal basis for the aforementioned processing activities is Art. 6 (1) 1 lit. b GDPR.

We will retain your Personal Data for (i) up to six months following the completion of the application process, if your application is unsuccessful or (ii) so long as necessary to employ you and provide you with services related to your employment and as required by applicable law, if the application process results in your employment at the Company.

Please note that if you search for vacant positions online via the Company's website, you may be redirected to the website of our third party service provider ("Third Party Service Provider") which assists us in our internal human resource operations. Such Third Party Service Provider will be identified to you before you create an account or submit an application. Prior to submitting an application via such Third Party Service Provider, you may be asked to create an account or log in using your account credentials from a third-party owned or operated platform/service (e.g., Facebook, Twitter, LinkedIn, etc.). Your online application and the information you submit in connection therewith may be processed by such Third Party Service Provider only for purposes of assisting us in managing, tracking, recruiting and evaluating our applicants. Please also note that the information you submit via any such Third Party Service Provider is subject to their policies, which may differ from the Company's policies (e.g., such policy may include a different data retention period). We encourage you to check the applicable policies of such Third Party Service Provider to determine, among other things, how they will process any personal information that they may collect from you.

To evaluate a candidate for certain management or executive positions, we may disclose your Personal Data to the Company's parent, subsidiary, and affiliated companies, which may require the transfer of your Personal Data to the United States. In the event of such transfer, we will take reasonable and appropriate security measures, including implementing Standard Contractual Clauses, to provide for the safe transfer and storage of your Personal Data; these Standard Contractual Clauses can be viewed here: [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en). The legal bases for such transfer is Art 6 (1) 1 lit. a or lit. b GDPR in conjunction with the respective national regulations, or Art. 28 GDPR in conjunction with the conclusion of a data processing agreement.

We will disclose your Personal Data to our service providers, recruiters and contractors (e.g., application submission services) who assist us with providing services necessary for the purposes listed herein. The following services providers are engaged by us, in order to provide specific services in the field of compliance and human resource management:

Harri Technologies (UK) Limited

Any transfer to those service providers is based on Art. 28 GDPR in conjunction with the conclusion of a data processing agreement.

In case a service provider is based outside the EU, reasonable measures will be undertaken to ensure an adequate level of data protection when transferring Personal Data to those service providers. To safeguard the transfer of Personal Data, we have concluded Standard Contractual Clauses which each recipient residing in a country outside the EU to whom Personal Data may be disclosed.

We will also disclose your Personal Data to government or law enforcement officials or private parties if it is necessary in order to comply with law or to respond to legal requests (including court orders and subpoenas). The disclosure of Personal Data is justified according to Art. 6 (1) 1 lit. c and f GDPR. The legitimate interest is the compliance with the respective legal requirements.

In the event that we disclose any Personal Data to a third party pursuant to the purposes described herein, we will implement appropriate measures and safeguards based on the sensitivity of the Personal Data to ensure that your Personal Data is processed in accordance with this notice and that its security and confidentiality is maintained.

Your Personal Data will not be subject to automated decision making.

## **YOUR RIGHTS**

With respect to your Personal Data, you have the right to:

- request access to and be provided with information on the processing of your Personal Data;
- request corrections of your Personal Data if such Personal Data proves inaccurate or incomplete;
- refuse to provide and – without impact to data processing activities that have taken place before such withdrawal or any other existing legal justification of the processing activity in question – withdraw your consent to processing of your Personal Data at any time;
- request that your Personal Data to be deleted (i) if it is no longer necessary for the purposes described in this Notice, (ii) where applicable, should you decide to withdraw your consent where you gave it, (iii) where applicable, should you object to its processing for direct marketing purposes, (iv) should you identify that it would have been unlawfully processed, (v) should we be under a legal obligation to erase it to comply with EU law or the law of an EU country and always provided that we are not under a legal obligation to keep it;
- restrict the processing of your Personal Data (i) if you contest its accuracy; (ii) if the processing is unlawful and you oppose the erasure; (iii) if it is no longer needed for the purposes set out in this Notice, but you require it for the establishment, exercise, or defense of a legal claim, (iv) where applicable, if you object to profiling;
- object to the processing of your Personal Data for direct marketing purposes or to any processing which we would have grounded on our legitimate interest (*e.g.*, profiling); and
- receive Personal Data which you provided to us in a structured, commonly used and machine-readable format and to transmit those to another provider provided these are processed based on your consent or our contract.

If you wish to exercise any of your above rights, please reach out to us by emailing us at [admin@trumpgolfscotland.com](mailto:admin@trumpgolfscotland.com). Although we urge you to contact us to find a solution for every concern

you may have, you always have the right to lodge a complaint with your competent data protection authority.

## **CONTACT**

If you have any questions about this Notice or about how we will handle your Personal Data, please contact:

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Or

Name: Nicola Wilson  
Title: Finance Manager  
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