

GLOBAL GOLF POST PRIVACY POLICY

Last modified: 1/3/19

1. Introduction

This Privacy Policy describes how Global Golf Post, LLC collects and uses Personal Data about you through the use of our Website and through email, text, and other electronic communications between you and Global Golf Post.

Global Golf Post, LLC (“**Global Golf Post**,” “**Our**,” “**Us**,” or “**We**”) respects your privacy and is committed to protecting it through our compliance with this policy.

This Privacy Policy (our “**Privacy Policy**”) describes the types of information we may collect from you or that you may provide when you visit the website www.globalgolfpost.com (our “**Website**”) and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies to information we collect:

- on our Website;
- in email, text, and other electronic messages between you and our Website; and
- when you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this policy.

It does not apply to information collected by:

- us offline or through any other means, including on any other website operated by Global Golf Post or any third-party (including our affiliates and subsidiaries); or
- any third party (including our affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from or on the Website.

Please read this Privacy Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you agree to this Privacy Policy. This Privacy Policy may change from time to time (see [Changes to Our Privacy Policy](#)). Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check this Privacy Policy periodically for updates.

2. Data Controller, Data Protection Officer, and Representative

Global Golf Post is the data controller of the Personal Data you provide on the Website. At this time, Global Golf Post does not have a Data Protection Officer or a Representative as those positions are defined in the EU General Data Protection Regulation.

Global Golf Post is the data controller of your Personal Data. Global Golf Post has not appointed a Data Protection Officer or a representative in the European Union as those positions are

defined in the General Data Protection Regulation. If Global Golf Post determines that it is required to appoint a Data Protection Officer or a representative in the European Union, Global Golf Post will update this Privacy Policy accordingly.

3. Children Under the Age of 18

Our Website is not intended for children under the age of 18 and we do not collect information from children under 18. We will remove any information about a child under the age of 18 if we become aware of it.

Our Website is not intended for children under 18 years of age. No one under age 18 may provide any information to or on the Website. We do not knowingly collect Personal Data from children under 18. If you are under 18, do not provide any personal information on our Website or on or through any of its features/register on the Website, make any purchases through the Website, use any of the interactive or public comment features of our Website or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received Personal Data from a child under 18 without verification of parental consent, we will delete that information. If you believe we might have any information from a child under 18, please contact us at using the information below in Section 18 (Contact Information).

4. Information We Collect About You and How We Collect It

We collect different types of information about you, including information that may directly identify you, information that is about you but individually does not personally identify you, and information that we combine with our other users. This includes information that we collect directly from you or through automated collection technologies.

Generally

We collect several types of information from and about users of our Website (“**Personal Data**”):

- by which you may be personally identified, such as name, postal address, billing address, email address, home or mobile telephone number, credit /debit card number (for billing purposes only), date of birth, or any other identifier by which you may be contacted online or offline;
- that is about you but individually does not identify you, such as traffic data, location data, logs, referring/exit pages, date and time of your visit to our Website, error information, clickstream data, and other communication data and the resources that you access and use on the Website, and
- about your internet connection, the equipment you use to access our Website and usage details.

We collect this information:

- directly from you when you provide it to us;
- automatically as you navigate through the Website. Information collected automatically may include usage details, IP addresses, and information collected through cookies, and other tracking technologies; and
- from third parties, for example, our business partners.

Information You Provide to Us

The information we collect on or through our Website is:

- information that you provide by filling in forms on our Website. This includes information provided at the time of registering to use our Website, subscribing to our serviced and purchasing our products, posting material, or requesting further services or information. We may also ask you for information when you enter a contest or promotion sponsored by us, and when you report a problem with our Website;
- records and copies of your correspondence (including email addresses), if you contact us;
- your responses to surveys that we might ask you to complete for research purposes;
- details of transactions you carry out through our Website and of the fulfillment of your orders. You may be required to provide financial information before placing an order through our Website; and
- your search queries on the Website.

The Personal Data we collect from you is required to enter into a contract with Global Golf Post, for Global Golf Post to perform under the contract, and to provide you with our products and services. If you refuse to provide such Personal Data or withdraw your consent to our processing of Personal Data, then in some cases we may not be able to enter into the contract or fulfill our obligations to you under it.

You also may provide information to be published or displayed (hereinafter, “**posted**”) on public areas of the Website or transmitted to other users of the Website or third parties (collectively, “**User Contributions**”). Your User Contributions are posted on and transmitted to others at your own risk. Although we take reasonable measures to secure access to our Website, please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other users of the Website with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

Information We Collect Through Automatic Data Collection Technologies

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns:

- details of your visits to our Website. We collect traffic data, location data, logs, referring/ exit pages, date and time of your visit to our Website, error information, clickstream data, and other communication data and the resources that you access and use on the Website; and
- information about your computer and internet connection, i.e. your IP address, operating system, and browser type.

The information we collect automatically may include Personal Data, or we may maintain it or associate it with Personal Data we collect in other ways or receive from third parties. It helps us to improve our Website and to deliver a better and more personalized service by enabling us to:

- estimate our audience size and usage patterns;
- store information about your preferences, allowing us to customize our Website according to your individual interests;
- speed up your searches; and
- recognize you when you return to our Website.

Details about the automated data collection technologies and the specific cookies that we use can be found in our Cookie Policy. <http://globalgolfpost.com/privacy-policy/>

5. Lawful Basis for Processing Your Personal Data

We have a lawful basis for our processing of your Personal Data, including processing for our legitimate interests (when balanced against your rights and freedoms), to fulfill our obligations to you under a contract with you, and required by law, and with your consent.

If you are in the European Union, the processing of your Personal Data is lawful only if it is permitted under the applicable data protection laws. We have a lawful basis for each of our processing activities (except when an exception applies as described below):

- **Consent.** By using our Website, you consent to our collection, use, and sharing of your Personal Data as described in this privacy policy. If you do not consent to this privacy policy, please do not use the Website;
- **Legitimate Interests.** We will process your Personal Data as necessary for our legitimate interests. Our legitimate interests are balanced against your rights and freedoms and we do not process your Personal Data if your rights and freedoms outweigh our legitimate interests. Our legitimate interests are to: facilitate communication between Global Golf Post and you; detect and correct bugs and errors and to improve our Website; safeguard our IT infrastructure and intellectual property; detect and prevent fraud and other crime; promote and market our business; check your credit and perform risk assessments; and develop our product and services.
- **To Fulfill Our Obligations to You under our Contract.** We process your Personal Data in order to fulfill our obligations to you pursuant to our contract with you to deliver our

goods and services to you. This includes to fulfil and administer transactions regarding the products and services you purchase from us.

- **As Required by Law.** We may also process your Personal Data when we are required or permitted to by law; to comply with government inspections, audits, and other valid requests from government or other public authorities; to respond to legal process such as subpoenas; or as necessary for us to protect our interests or otherwise pursue our legal rights and remedies (for instance, when necessary to prevent or detect fraud, attacks against our network, or other criminal and tortious activities), defend litigation, and manage complaints or claims.

6. Special Categories of Information

We generally do not request you provide and do not process any special categories of Personal Data.

Global Golf Post does not ask you to provide, and we do not knowingly collect, any special categories of Personal Data from you.

7. Automated Decisions Making

We may process your Personal Data with automated decision making processes. A high-level description of the algorithms we use below.

Our processing of your personal data may include automated decision making, including profiling, which may produce a legal effect concerning you or similarly significantly affect you. The algorithms used for our automated decision making.

8. How We Use Your Information

We use your Personal Data for various purposes described below, including to:

- provide our Website to you;
- provide you with information you request from us;
- enforce our rights arising from contracts;

We use information that we collect about you or that you provide to us, including any Personal Data:

- to present our Website and their contents to you;
- to provide you with information, products, or services that you request from us;
- to register and service your online account;
- to contact you about or in response to a request;

- to process, fulfill, and administer transactions and orders placed through our Website;
- to administer surveys, sweepstakes, promotions, and contests;
- to fulfill any other purpose for which you provide it;
- to provide you with notices about your account/subscription, including expiration and renewal notices;
- to carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection;
- to notify you about changes to our Website or any products or services we offer or provide through them;
- to allow you to participate in interactive features on our Website;
- in any other way we may describe when you provide the information; and
- for any other purpose with your consent.

With your consent, we may also use your information to contact you about our goods and services that may be of interest to you. If you wish to consent to this use, please check the relevant box located on the form on which we collect your data. If you wish to change your choice, you may do so at any time by logging into the Website and adjusting our user preferences in your account profile by checking or unchecking the relevant boxes or by sending us an email stating your request at plus@globalgolfpost.com. For more information, see [Choices About How We Use and Disclose Your Information](#).

We may use the information we have collected from you to enable us to display advertisements to our advertisers' target audiences. Even though we do not disclose your Personal Data for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

9. Disclosure of Your Information

We do not share, sell, or otherwise disclose your Personal Data for purposes other than those outlined in this Privacy Policy. We disclose your Personal Data to a few third parties, including:

- our subsidiaries and our affiliates;
- our third-party service providers that we use to support our business;
- to a company we merge, acquire, or that buys us, or in the event of change in structure of our company of any form;
- to comply with our legal obligations;

We do not share, sell, or otherwise disclose your Personal Data for purposes other than those outlined in this Privacy Policy. However, we may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose Personal Data that we collect or you provide as described in this privacy policy:

- to our subsidiaries and affiliates;
- to contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep Personal Data confidential and use it only for the purposes for which we disclose it to them. These entities provide IT and infrastructure support services, and payment processing services.
- to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Global Golf Post, LLC 's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by Global Golf Post, LLC about our Website's users is among the assets transferred;
- to fulfill the purpose for which you provide it;
- for any other purpose disclosed by us when you provide the information; and
- with your consent.

We may also disclose your Personal Data:

- to comply with any court order, law, or legal process, including to respond to any government or regulatory request;
- to enforce or apply our terms of use <http://globalgolfpost.com/privacy-policy/> and other agreements, including for billing and collection purposes; and
- if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Global Golf Post, LLC, our customers, or others.

10. Choices About How We Use and Disclose Your Information

We offer you choices on how you can opt out of our advertising to you, and other targeted advertising.

We do not control the collection and use of your information collected by third parties described above in [Disclosure of Your Information](#). When possible, these organizations are under contractual obligations to use this data only for providing the services to us and to maintain this information strictly confidential. These third parties may, however, aggregate the information they collect with information from their other customers for their own purposes.

In addition, we strive to provide you with choices regarding the Personal Data you provide to us. We have created mechanisms to provide you with control over your Personal Data:

- **Promotional Offers from Global Golf Post.** We will only use your contact information to promote our own or third parties' products and services with your express consent. If you wish to consent to such use, you can check the relevant box located on the form on which we collect your Personal Data or otherwise seek such consent. If you wish to change your choice, you may do so at any time by logging into the Website and adjusting your user preferences in your account profile by checking or unchecking the relevant boxes or by sending us an email stating your request to plus@globalgolfpost.com. If we have sent you a promotional email, you may send us a return email asking to be omitted from future email distributions. This opt out does not apply to information provided to Global Golf Post as a result of a product purchase, product service experience or other transactions.

You can learn more about interest-based advertisements and your opt-out rights and options from members of the Network Advertising Initiative (“NAI”) on its website (www.networkadvertising.org) and from members of the Digital Advertising Alliance on its website (www.aboutads.info). We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can also opt out of receiving targeted ads from members of the NAI on its website.

11. Your Rights Regarding Your Information and Accessing and Correcting Your Information

You may have certain rights under applicable data protection laws, including the right to access and update your Personal Data, restrict how it is used, transfer certain Personal Data to another controller, withdraw your consent at any time, and the right to have us erase certain Personal Data about you. You also have the right to complain to a supervisory authority about our processing of your Personal Data.

Applicable data protection laws may provide you with certain rights with regards to our processing of your Personal Data.

- **Access and Update.** You can review and change your Personal Data by logging into the Website and visiting your **“Account”** page. You may also notify us through the [Contact Information](#) below of any changes or errors in any Personal Data we have about you to ensure that it is complete, accurate, and as current as possible. We may also not be able to accommodate your request if we believe it would violate any law or legal requirement or cause the information to be incorrect.
- **Restrictions.** You have the right to restrict our processing of your Personal Data under certain circumstances. In particular, you can request we restrict our use of it if you contest its accuracy, if the processing of your Personal Data is determined to be unlawful, or if we no longer need your Personal Data for processing but we have retained it as permitted by law.
- **Portability.** To the extent the Personal Data you provide Global Golf Post is processed based on your consent or that we process it through automated means, you

have the right to request that we provide you a copy of, or access to, all or part of such Personal Data in structured, commonly used and machine-readable format. You also have the right to request that we transmit this Personal Data to another controller, when technically feasible.

- **Withdrawal of Consent.** To the extent that our processing of your Personal Data is based on your consent, you may withdraw your consent at any time by closing your account. Withdrawing your consent will not, however, affect the lawfulness of the processing based on your consent before its withdrawal, and will not affect the lawfulness of our continued processing that is based on any other lawful basis for processing your Personal Data.
- **Right to be Forgotten.** You have the right to request that we delete all of your Personal Data. We cannot delete your Personal Data except by also deleting your user account, and we will only delete your account when we no longer have a lawful basis for processing your Personal Data or after a final determination that your Personal Data was unlawfully processed. We may not accommodate a request to erase information if we believe the deletion would violate any law or legal requirement or cause the information to be incorrect. In all other cases, we will retain your Personal Data as set forth in this policy. In addition, we cannot completely delete your Personal Data as some data may rest in previous backups. These will be retained for the periods set forth in our disaster recovery policies. If you delete your User Contributions from the Website, copies of your User Contributions may remain viewable in cached and archived pages, or might have been copied or stored by other Website users. Proper access and use of information provided on the Website, including User Contributions, is governed by our terms of use, <http://globalgolfpost.com/privacy-policy/>
- **Complaints.** You have the right to lodge a complaint with the applicable supervisory authority in the country you live in, the country you work in, or the country where you believe your rights under applicable data protection laws have been violated. However, before doing so, we request that you contact us directly in order to give us an opportunity to work directly with you to resolve any concerns about your privacy.
- **How You May Exercise Your Rights.** You may exercise any of the above rights by contacting us through any of the methods listed under [Contact Information](#) below. If you contact us to exercise any of the foregoing rights, we may ask you for additional information to verify your identity. We reserve the right to limit or deny your request if you have failed to provide sufficient information to verify your identity or to satisfy our legal and business requirements. Please note that if you make unfounded, repetitive, or excessive requests (as determined in our reasonable discretion) to access your Personal Data, you may be charged a fee subject to a maximum set by applicable law.

12. Do Not Track Signals

We currently do not honor do-not-track signals that may be sent by some browsers.

We also may use automated data collection technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking). Some web browsers permit you to broadcast a signal to websites and online services indicating a preference that they “do not track” your online activities. At this time, we do not honor such signals and we do not modify what information we collect or how we use that information based upon whether such a signal is broadcast or received by us.

13. Data Security

Information transmitted over the Internet is not completely secure, but we do our best to protect your Personal Data. You can help protect your Personal Data and other information by keeping your password to our Websites confidential.

We have implemented measures designed to secure your Personal Data from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls. Any payment transactions will be encrypted.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Website like message boards. The information you share in public areas may be viewed by any user of the Website.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your Personal Data, we cannot guarantee the security of your Personal Data transmitted to our Website. Any transmission of Personal Data is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

14. Consent to Processing of Personal Data in the United States

We may process your Personal Data outside of your home country, including to the United States. We only do this when we are legally permitted to do so and when we have appropriate safeguards in place to protect your Personal Data.

If you are a resident of the European Economic Area (“EEA”), in order to provide our Website, products, and services to you, we may send and store your Personal Data outside of the EEA, including to the United States. Accordingly, your Personal Data may be transferred outside the country where you reside or are located, including to countries that may not or do not provide an equivalent level of protection for your Personal Data.

Your Personal Data is transferred by Global Golf Post to another country only if it is required or permitted under applicable data protection law and provided that there are appropriate safeguards in place to protect your Personal Data. By using our Website, you represent that you have read and understood the above and hereby consent to the storage and processing of Personal Data that you provide directly to us on our Website. To ensure your Personal Data (other than Personal Data you provide directly to us on our Website) is treated in accordance with this Privacy Policy, Global Golf Post uses Data Protection Agreements between Global Golf Post and all other recipients of your data that include, where applicable, the Standard Contractual Clauses adopted by the European Commission (the “**Standard Contractual Clauses**”). The European Commission has determined that the transfer of Personal Data pursuant to the Standard Contractual Clauses provides for an adequate level of protection of your Personal Data. Under these Standard Contractual Clauses, you have the same rights as if your data was not transferred to such third party. You may request a copy of the Data Protection Agreement by contacting us through the [Contact Information](#) below.

15. Data Retention Periods

We retain your Personal Data for as long as you keep your account open. In some instances, we may keep it after you close your account, for example we may keep it:

- on our backup and disaster recovery systems;
- for as long as necessary to protect our legal interests; and

Global Golf Post will retain your Personal Data for the entire time that you keep your account open. After you close your account, we may retain your Personal Data:

- for as long as necessary to comply with any legal requirement;
- on our backup and disaster recovery systems in accordance with our backup and disaster recovery policies and procedures;
- for as long as necessary to protect our legal interests or otherwise pursue our legal rights and remedies; and
- for data that has been aggregated or otherwise rendered anonymous in such a manner that you are no longer identifiable, indefinitely.

16. Changes to Our Privacy Policy

We will post any changes to our Privacy Policy on our Website. If we make material changes to our Privacy Policy, we may notify you of such changes through your contact information and invite you to review (and accept, if necessary) the changes.

We may change this Privacy Policy at any time. It is our policy to post any changes we make to our Privacy Policy on this page with a notice that the Privacy Policy has been updated on the Website’ home page. If we make material changes to how we treat our users’ Personal Data, we will notify you by email to the email address specified in your account. The date this Privacy

Policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Website and this Privacy Policy to check for any changes.

17. Contact Information

You may contact our Data Protection Officer through the contact information below. If you wish to contact us, you must contact both us and our representative through the contact information below or through the “Contact Us” page on our Website.

If you have any questions, concerns, complaints or suggestions regarding our Privacy Policy, have any requests related to your Personal Data pursuant to applicable laws, or otherwise need to contact us, you may do so at the contact information below or through the “Contact” page on our Website.

To Contact Global Golf Post (Controller)

Global Golf Post

Attn:

P.O. Box 132

Glenview, IL 60025

United States

plus@globalgolfpost.com