

GOLFTEC PRIVACY POLICY

CANADA ADDENDUM

Last updated : December 31st, 2022

This GOLFTEC Privacy Policy Canada Addendum (the “Addendum”) supplements and should be read in conjunction with the GOLFTEC Privacy Policy (the “Privacy Policy”) and applies to all users to the extent GOLFTEC is subject to the Personal Information Protection and Electronic Documents Act (“PIPEDA”), generally, regarding people who purchased or received the Goods or the Services in Canada. We adopt this Addendum to comply with the PIPEDA and any terms defined in PIPEDA or our Privacy Policy have the same meaning when used in this Addendum. This Addendum takes precedence over anything contradictory in our Privacy Policy in connection with the users in Canada.

Principle 1: Accountability

We comply with the ten (10) fair information principles of the PIPEDA and remain accountable to you.

Principle 2: Identifying Purposes

We will jointly use the Users' Personal Data for the purposes described in Section 7 of the Privacy Policy among the companies as defined as GOLFTEC and Golf Digest Online Inc. GOLFTEC Enterprises LLC will be responsible for the use of your Personal Data in relation to such joint use.

Party responsible for the management of Personal Data to be jointly used: GOLFTEC Enterprises LLC

Address: 67 Inverness Drive East, Suite A, Englewood CO, 80112 USA

Representative: Sakal Heng (Privacy Officer)

For any other questions or concerns regarding Section 7 of the Privacy Policy, please refer to the “Contact Information (Canada)” section below.

Principle 3: Consent

Through your use and purchase of our Goods and Services, you expressly consent to the collection, use, and disclosure of Personal Data by GOLFTEC as outlined in this Addendum and our Privacy Policy. Except in limited and specific circumstances, as permitted by law, you may withdraw your consent to our use of Personal Data at any time.

Principle 4: Limiting Collection

We limit the collection of Personal Data to what is required to provide our services. For more information on how we collect Personal Data, please reference the Privacy Policy.

Principle 5: Limiting Use, Disclosure, and Retention

Our procedures limiting use, disclosure, and retention of Personal Data, are outlined in the Privacy Policy. Please contact us with any questions or concerns. For our contact information, please refer to the “Contact Information (Canada)” section below.

Principle 6: Accuracy

Our collection of Personal Data is as accurate and complete as possible in order to properly satisfy the purposes for which it is used. For more information as to how we use Personal Data, please reference the Privacy Policy.

Principle 7: Safeguards

Our security measures are outlined in Section 8 of the Privacy Policy. Each company included in the definition of GOLFTEC outside of Canada has established a system necessary to continuously take appropriate measures. If you wish to check the details of the security control measures, please contact us. For our contact information, please refer to the "Contact Information (Canada)" section below.

Principle 8: Openness

We are committed to transparency surrounding our policies and practices related to your Personal Data. Information about our policies and practices relating to the management of Personal Data is publicly and readily available in the Privacy Policy.

Principle 9: Individual Access

If you wish to exercise any of the user rights set forth in the Privacy Policy or applicable laws and regulations (including requests for disclosure, correction, addition, deletion, suspension of use, elimination, suspension of provision to third parties, withdrawing consent, disclosure of details of security control measures or measures taken to ensure the continued implementation of equivalent measures at the recipients outside Canada in accordance with PIPEDA), please contact us for details on how to exercise such rights and procedures. For our contact information, please refer to the “Contact Information (Canada)” section below.

Before responding to a request for disclosure, correction, deletion or any other request for Personal Data of a User, we may ask the User to confirm the identity of the User. For this verification, we may ask the User to provide information such as information registered in the User’s account, or

a copy of an identification card issued by a government agency. We will respond to the request within thirty days from the receipt of the request unless otherwise allowed or required by law.

Principle 10: Challenging Compliance

Users have the right to challenge our compliance with the PIPEDA. To do so, please refer to the “Contact Information (Canada)” section below.

Contact Information (Canada)

For inquiries regarding the Privacy Policy and this Addendum in Canada, please contact the legal department at the contact information below.

GOLFTEC Legal Department
Representative: Sakal Heng (Privacy Officer)
Contact: privacy@golftec.com

For contact information in English, please refer to the "Contact Us" section in Section 14 of the Privacy Policy.