

GOLFTEC CCPA Privacy Notice

Last Updated: December 31st, 2022

This GOLFTEC CCPA Privacy Notice (“**CCPA Notice**”) applies in circumstances where GOLFTEC’s privacy practices are subject to the California Consumer Privacy Act (“**CCPA**”). This CCPA Notice supplements and should be read in conjunction with the information in the GOLFTEC Privacy Policy and applies solely to all users who access our Services who are located in California. We adopt this CCPA Notice to comply with the CCPA and any implementing acts of the foregoing and any terms defined in the CCPA or our Privacy Policy have the same meaning when used in this CCPA Notice. This CCPA Notice takes precedence over anything contradictory in our Privacy Policy.

If you have any questions regarding this CCPA Notice or the GOLFTEC Privacy Policy, please contact us at privacy@golftec.com.

Personal Information We Collect (“Personal Data”)

| CATEGORY | EXAMPLES OF PERSONAL INFORMATION |
|---|---|
| A. Identifiers. | A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, phone number, email address, account name, date of birth, names of children who use club services. |
| B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)). | A name, signature, physical characteristics or description, address, telephone number, date of birth, financial account information, credit card number, debit card number, medical information. |
| C. Protected classification characteristics under California or federal law. | Age, marital status, medical condition, physical disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), veteran or military status, genetic information. |
| D. Commercial information. | Records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies. |
| E. Biometric information. | Sleep, health, or exercise data that may contain identifying information (but not including physiological or biological imagery from which an identifier template (e.g., faceprint or fingerprint) that can be used to establish individual identity). |
| F. Internet or other similar network activity. | Browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement. |
| G. Audio/video data | |
| H. Geolocation data. | Physical location or movements. |
| I. Sensory data. | Audio, visual, heart rate, pulse, and other exercise activity data, body temperature, including scanning thermal body temperature. |

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| J. Professional or employment-related information. | Current or past job history. |
| K. Education information, as defined by the Family Educational Rights and Privacy Act. | None. |
| L. Inferences drawn from other personal information. | Profile reflecting a person's preferences, characteristics, behavior. |

Personal information does not include deidentified, pseudonymized, anonymized, and/or aggregated consumer data.

We collect the categories of Personal Data listed above from the following sources:

- Directly from you, such as via forms you complete.
- Indirectly from you, such as via cookies on a website you visit or information shared by our mobile applications.

Use of Your Personal Information

We collect, use and disclosure your Personal Data in the manner described in our Privacy Policy based on the following legal basis and dependent on the particular processing:

- Our legitimate business interest and will only do so in a responsible and commercially reasonable manner. We will not process your Personal Data if doing so would constitute an unwarranted interference with your own interests, rights and freedoms.
- The performance of a contract with you.
- To comply with your request.
- To comply with legal or statutory obligations.
- Your consent.

Sharing of Your Personal Information for a Business Purpose

We may share your Personal Information with a third party for a business purpose. Most commonly we share with our affiliates and service providers who provide services to us that enable us to provide the Services to you.

During the preceding twelve (12) months, GOLFTEC has disclosed the categories of Personal Information for a business purpose to the categories of third-party recipients as listed below:

| CATEGORY | CATEGORIES OF THIRD-PARTY RECIPIENTS |
|--|---|
| Identifiers | GOLFTEC Group, Franchisees, Service Providers, Ad Networks |
| Personal information described in Cal. Civ. Code §1798.80(e) | GOLFTEC Group, Franchisees, Service Providers |
| Protected classification characteristics | GOLFTEC Group, Franchisees, Service Providers, Other Users, Ad Networks |
| Commercial Information | GOLFTEC Group, Franchisees, Ad Networks |
| Biometric data | GOLFTEC Group, Franchisees |

| | |
|--|---|
| Internet Usage Information | GOLFTEC Group, Franchisees, Service Providers, Ad Networks |
| Audio/video data | GOLFTEC Group, Franchisees, Other Users |
| Geolocation data | GOLFTEC Group, Franchisees, Service Providers, Ad Networks |
| Inferences drawn from other personal information | GOLFTEC Group, Franchisees, Service Providers, Ad Networks |
| Identifiers | GOLFTEC Group, Franchisees, Service Providers, Ad Networks |
| Personal information described in Cal. Civ. Code §1798.80(e) | GOLFTEC Group, Franchisees, Service Providers |
| Protected classification characteristics | GOLFTEC Group, Franchisees, Service Providers, Other Users, Ad Networks |

Sales of Personal Information

During the preceding twelve (12) months, GOLFTEC has not sold Personal Information.

Your Rights Regarding Your Personal Data

Your rights regarding your Personal Data

We undertake to respect the confidentiality of your Personal Data and to guarantee that you can exercise your rights listed below under this Privacy Policy, and by your local law if applicable:

- **The right to know Your Personal Data.** The right to know the Personal Data we have collected, used and/or disclosed on you in the previous twelve (12) months. Whenever made possible, you can access your Personal Data directly within your GOLFTEC Clubhouse account settings section. If you are unable to perform this action yourself, please contact us to assist you. We will disclose and deliver categories and/or specific pieces of your Personal Data that we have collected, used and/or disclosed, free of charge, but to the extent such disclosure is required under the applicable law.
- **The right to request correction of your Personal Data that we hold.** You have the right to have any incomplete or inaccurate information we hold about you corrected. In many instances, you can enact these updates in your GOLFTEC Clubhouse account or you can request changes be made by contacting us.
- **The right to request deletion of Your Personal Data.** You have the right to ask us to delete or remove all of your Personal Data. Since the Personal Data collected is necessary for us to provide our Services to you, this will mandate we close your account with us.
- **Right to Non-Discrimination.** You have the right to be free from discrimination by us as a result of the exercise of your rights under this section.
- **The right to withdraw Your consent.** You have the right to withdraw your consent regarding use of your Personal Data. If you withdraw your consent, we may not be able to provide you with access to certain specific functionalities of the Services.

Exercise of your right and verification

To exercise your rights under this Privacy Policy or applicable law, please contact us at privacy@golftec.com.

Before we respond to your request to know, correct or delete your Personal Data, we may request you to verify your identity, which process may include submission of your Personal Data such as the data that you have registered on your Account and/or a copy of your government-issued identification document.

Response Time

We will confirm receipt of your request within ten (10) business days. We try to substantively respond to a verifiable request within 45 days of its receipt. If we require more time (up to another 45 days), we will inform you of the reason and extension period in writing.

Any disclosures we provide will only cover the 12-month period preceding our receipt of your request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. We do not charge a fee to process or respond to your verifiable request.

Authorized Agent

You may use an authorized agent to submit a request to know, correct or delete your Personal Data. To designate an agent for these purposes:

- You must provide us with a copy of a written and signed power of attorney given to your authorized agent; and
- You must verify your own identity directly with us.

Changes to our Privacy Policy and this CCPA Notice

We will only use Personal Data in the manner described in the Privacy Policy and this CCPA Notice in effect when the information was collected from you. From time to time, we may change this CCPA Notice. We will notify you of any changes by posting the new CCPA Notice on this page.

We will let you know via email and/or a prominent notice on our Services and update the "Last updated" date at the top of this CCPA Notice. If a change is material, we will provide at least thirty (30) days' notice prior to any new terms taking effect. What constitutes a material change will be determined at our sole discretion.

Where required by the CCPA, you will be given the choice at that time to "opt-in" for any additional uses or disclosures of your Personal Data that you made available to us prior to the change in the Privacy Policy or this CCPA Notice. In such circumstances, if you do not grant us your informed consent for the processing of your Personal Data for such additional purposes your Personal Data will not be used for any purposes other than those to which you have agreed.

Complaints

If you are not happy with the way we have used your information or addressed your rights, please contact us at privacy@golftec.com.