

# GOLFTEC EU Privacy Addendum

Last Updated: December 31<sup>st</sup>, 2022

This GOLFTEC EU Privacy Addendum (“**Addendum**”) applies in circumstances where GOLFTEC’s privacy practices are subject to the EU General Data Protection Regulation (2016/679) and any implementing acts of the foregoing by any of the member states of the European Economic Area, the United Kingdom, or Switzerland (the “**GDPR**”). This Addendum 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 the European Economic Area. We adopt this Addendum to comply with the GDPR and any terms defined in the GDPR or our Privacy Policy have the same meaning when used in this Addendum. This Addendum takes precedence over anything contradictory in our Privacy Policy.

If you have any questions regarding this Addendum or the GOLFTEC Privacy Policy, please contact us at [privacy@golftec.com](mailto:privacy@golftec.com).

## **1. Legal Basis for Processing Personal Data**

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.

## **2. Legal Basis for Processing Special Categories of Data**

When we process special categories of data, such as your health or biometric data, we will do so on the following basis:

- Your explicit consent.
- Compliance with legal and regulatory obligations.

## **3. Transfers Abroad**

- In connection with the Services, we may transfer your Personal Data outside the European Economic Area, including to a jurisdiction which is not recognized by the European Commission as providing for an equivalent level of protection for Personal Data as is provided for in the European Union. If and to the extent that we do so, we will ensure that

appropriate measures are in place to comply with our obligations under applicable law governing such transfers. These may include entering into a contract governing the transfer that contains the ‘standard contractual clauses’ approved for this purpose by the European Commission. If you would like to receive further details of the measures that we have taken in this regard, please contact us at [privacy@golftec.com](mailto:privacy@golftec.com).

#### **4. Your Rights**

Under the GDPR, you have the following rights, which apply in certain circumstances and subject to certain restrictions:

- **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.
- Where our processing of Personal Data is based on you having provided your consent or the processing is necessary for the performance of a contract with you, you have the right to receive your Personal Data, which you provided to us, in a structured, commonly used and machine-readable format or to require us to transmit that data to another controller.

If you wish to exercise any of the rights set out above, please contact us at [privacy@golftec.com](mailto: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.

#### **5. Changes to our Privacy Policy and this Addendum**

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

## **6. Contact Information**

For inquiries regarding the Privacy Policy and this Addendum, please contact our Data Protection Officer at the contact information below.

Name: Sakal Heng (Data Protection Officer)  
Phone: (303)-223-2381  
Contact: [privacy@golftec.com](mailto:privacy@golftec.com)  
Address: 67 Inverness Drive East, Suite A, Englewood, CO 80112

In addition to your country's data protection agency, you also have the right to reach out to the European Data Protection Supervisor, the EU's independent data protection authority, if you have any concerns: [https://edps.europa.eu/data-protection/our-role-supervisor/complaints\\_en](https://edps.europa.eu/data-protection/our-role-supervisor/complaints_en).