

# **GOLFTEC PRIVACY POLICY** **HONG KONG ADDENDUM**

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

This GOLFTEC Privacy Policy Hong Kong 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 Data (Privacy) Ordinance and the Amendment Ordinance (together, the “PDPO”), generally, regarding people who purchased or received the Goods or the Services in Hong Kong. We adopt this Addendum to comply with the PDPO and any terms defined in the PDPO 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 Hong Kong.

## **Voluntary Collection**

Users voluntarily supply us with Personal Data through their use of our Goods and Services. The purposes for the use of a User’s Personal Data are described in Section 7 of the Privacy Policy. Users may request disclosure, correction or deletion of their Personal Data at any time by contacting us. For our contact information, please refer to the "Contact Information (Hong Kong)" section below.

## **Joint use of Personal Data within GOLFTEC Group**

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: GOLFTEC Legal Department

## **International Transfer**

Each company included in the definition of GOLFTEC outside of Hong Kong has established a system necessary to continuously take measures equivalent to those required under the PDPO. We have also taken necessary and appropriate measures to ensure the continuous implementation of such equivalent measures by the recipients. If you wish to check the details of these measures, please contact us. For our contact information, please refer to the "Contact Information (Hong Kong)" section below.

### **Retention of Users' Personal Data/Data Security**

We will take necessary and appropriate measures to prevent leakage, loss, or damage of your Personal Data handled and to securely manage your Personal Data. 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 (Hong Kong)" section below.

### **Exercise of Rights and ID Verification**

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

### **Contact Information (Hong Kong)**

For inquiries regarding the Privacy Policy and this Addendum in Hong Kong, please contact us at the contact information below.

Contact: GOLFTEC Legal Department  
Email: [privacy@golftec.com](mailto:privacy@golftec.com)  
Address: 67 Inverness Drive East, Suite A, Englewood, CO 80112 USA

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