

8AM COMPANIES PRIVACY POLICY

Effective 4/10/2024

1. INTRODUCTION

8AM Golf Holdings, LLC, along with its affiliated companies (“**8AM Companies**” “**us**,” “**our**,” or “**we**”) are committed to respecting and protecting your privacy. This privacy policy (“**Privacy Policy**”) explains how we collect, process, and share Personal Data (defined below), your Rights & Choices with respect to your Personal Data, and other important information. Please read this Privacy Policy carefully before using our Services (defined below) and/or providing us with your Personal Data. You can download this Privacy Policy by clicking here.

2. SCOPE OF THIS POLICY

This Privacy Policy applies to Personal Data collected through our “**Services**”, which include:

Our “**Offline Services**” – Services provided to you over the phone or in person, e.g., customer support calls, services at our physical locations, or in-person events; and

Our “**Digital Services**” – our websites, including 8amgolf.com, golf.com, other websites linked at <https://8amgolf.com/pages/companies> and any other website for an 8AM Company where we post or link to this Privacy Policy (including any subdomains or mobile versions, each, a “**Website**”), mobile applications, such as Green Books, Clubhouse, and Golflogix (“**Apps**”), online support, or other online services that link to this Privacy Policy.

3. WHO WE ARE

The 8AM Golf Holdings, LLC family of companies are an integrated collection of brands with the shared mission of supporting and celebrating golfers and the golf industry. The 8AM Companies include (without limitation):

- 8AM-owned and operated facilities and properties (such as T-Squared Social and 3s Greenville);
- com, Golf Magazine, 8AM Golf Holdings, LLC, True Spec Golf, GolfLogix, Inc., Miura Golf LLC, Chirp Golf LLC, Fairway Jockey, Club Conex, and the Nicklaus Companies;
- Other current and future 8AM affiliates and subsidiaries.

4. HOW TO CONTACT US/CONTROLLER

The controller of your Personal Data under this Policy is 8AM Golf Holdings, LLC, 6 East 43rd Street, New York, NY 10017. You may contact our US Data Privacy Team as follows:

General Inquiries and Data Updates:

privacy@8amgolf.com

Opt-Out of Data Sales or Sharing; Limit uses of Sensitive Personal Data:

Visit the [8AM Companies Privacy Request Form](#); email or call via the brand contact info listed below.

Regional Data Rights:

Visit the [8AM Companies Privacy Request Form](#); mail to the address below; email or call via the brand contact info listed below.

Direct Marketing Disclosure Inquiries:

Mail to the address below or email privacy@8amgolf.com

Physical Address:

8AM Golf Holdings
Attn: Privacy
6 East 43rd Street
New York, NY 10017

You may contact a specific 8AM brand as follows:

Company Name	EMAIL	Toll-Free Phone
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3s Greenville	privacy@3s.golf	(855) 929-4081
8AM Golf Holdings, LLC; ECC Golf Holdings, Inc.	privacy@8amgolf.com	
Chirp Golf LLC	privacy@chirpgolf.io	
Club Conex	privacy@clubconex.com	
Fairway Jockey	privacy@fairwayjockey.com	
Golf.com; Golf Magazine; EB Golf Media LLC	privacy@golf.com	
GolfLogix, Inc.	privacy@golflogix.com	
Miura Golf LLC	privacy@miuragolf.com	
Nicklaus Companies	privacy@nicklaus.com	
True Spec Golf	privacy@truespecgolf.com	
T-Squared Social	privacy@tsquaredsocial.com	

5. THE CATEGORIES AND SOURCES OF PERSONAL DATA WE COLLECT AND PROCESS

The following described the categories and sources of data that we process relating to identified or identifiable individuals and households (“**Personal Data**”).

A. *Categories of Personal Data*

The categories of Personal Data we collect and process may include:

AUDIO/VISUAL DATA

Recordings and images collected from audio files and records, such as voicemails, call recordings, and the like, and videos created in connection with CCTV systems.

BIOGRAPHICAL DATA

Information such as your gender, date of birth, age and/or age range, nationality, and similar biographical information.

CONTACT DATA

Identity Data we can use to contact you, such as email and physical addresses, phone numbers, social media or communications platform usernames/handles.

DEVICE / NETWORK DATA

Browsing history, search history, and information regarding your interaction with a website, application, or advertisement (e.g. IP Address, MAC Address, SSIDs, application ID/AdID/IDFA, session navigation history and similar browsing metadata, and other data generated through applications and browsers, including cookies and similar technologies or other device identifiers or persistent identifiers), online user ID, device characteristics (such as browser/OS version), web server logs, application logs, first party cookies, third party cookies, web beacons, clear gifs and pixel tags.

GENERAL LOCATION DATA

Non-precise location data, e.g. location information derived from social media tags/posts, or general areas of our facilities and properties you visited.

IDENTITY DATA

Information such as your name; address; email address; telephone number; gender; date of birth, age and/or age range; account login details, e.g. username and password, avatar, or other account handles/usernames; ticket/RFID identifiers; or license plates.

INFERENCE DATA

Personal Data used to create a profile about you reflecting your preferences (such as the products you seem to prefer based on use of our Websites or your purchases), as well as your characteristics, likes, interests, and other data or analytics provided about you by social media companies or data aggregators.

SENSITIVE PERSONAL DATA

Personal Data deemed “sensitive” under California or other laws, such as social security, driver’s license, state identification card, or passport number; account log-in and password, financial account, debit card, or credit card number; precise location data; racial or ethnic origin, religious or philosophical beliefs, etc. We collect only the following categories of Sensitive Personal Data:

“**Government ID Data**” Data relating to official government identification, such as driver’s license or passport numbers, including similar Identity Data protected as Sensitive Data under applicable law.

“**Health Data**” Information about your health, such as allergies or disability accommodations.

“**Payment Data**” Information such as bank account details, payment card information, including similar data protected as Sensitive Data under applicable law, and relevant information in connection with a financial transaction.

“**Precise Location Data**” data from GPS, WiFi triangulation, certain localized Bluetooth beacons, or technologies used to locate you at a precise location and time.

TRANSACTION DATA

Information about the Services we provide to you, the products or services you purchase through our Services, and similar information.

USER CONTENT

Unstructured/free-form data that may include any category of Personal Data, e.g. data that you give us in free text fields such as comment boxes.

B. Sources of Personal Data

We collect Personal Data from various sources, which include:

DATA YOU PROVIDE US

We collect Personal Data from you directly, for example, when you create an account on our Digital Services, when you purchase products or services, or when you use our Apps.

DATA WE COLLECT AUTOMATICALLY

We collect Personal Data about or generated by any device used to access our Digital Services, or when you use WiFi at our properties.

SERVICE PROVIDERS

We receive Personal Data from various service providers performing services on our behalf.

OTHER 8AM COMPANIES

In some circumstances, including in connection with our Business and Commercial Purposes, we may receive Personal Data about you from other 8AM Companies with which you interact.

AGGREGATORS AND ADVERTISERS

We receive Personal Data from ad networks, data brokers, Targeted Advertising vendors, market research, and social media companies or similar companies who provide us with additional Personal Data, e.g. Inference Data.

SOCIAL MEDIA COMPANIES

We receive Personal Data from Meta (e.g. Facebook and Instagram) and other social media companies when you interact with that social media company on or in connection with our Services.

DATA WE CREATE OR INFER

We, certain partners, social media companies, and third parties operating on our behalf, create and infer Personal Data such as Inference Data or Aggregate Data based on our observations or analysis of other Personal Data processed under this Policy, and we may correlate this data with other data we process about you.

6. DATA PROCESSING CONTEXTS / NOTICE AT COLLECTION

We collect and process Personal Data in several contexts when you use our Services, as described below. Click the following links to review supplemental disclosures relating to [Data Retention](#) and [Regional Data Rights](#).

A. ACCOUNT REGISTRATION

When you create an account on our Digital Services, we process any Personal Data you provide on the registration form, which typically includes Identity Data, Contact Data, Biographical Data, and User Content, and we may also collect or create Device/Network Data, Inference Data, and General Location Data relating to your device, or derived from your use of our Services.

We process Personal Data collected in this context to create, maintain, and provide you with your account, provide account-based services you request, and determine your eligibility to view or participate in certain geo-restricted features/content. Additionally, we use the Identity Data and Contact Data as necessary to provide you transactional messages with important information about your account. We may use such Personal Data for personalization, to create consumer profiles, and for other Business Purposes or Commercial Purposes (which may include data sales or “sharing”).

B. PURCHASES AND TRANSACTION

We generally process Payment Data, Transaction Data, Contact Data, and Inference Data when you engage in a purchase and sale transaction, whether through our Digital Services, over the phone, or in person through Offline Services. In addition, we may also collect or create Device/Network Data when you complete a transaction through our Digital Services.

We process Personal Data collected in this context as necessary to perform or initiate a contract with you, process your order, and carry out fulfillment-related processing and for in connection with our Business Purposes and other legitimate interests, such as ensuring the security of our Services, preventing fraud, providing information about our Services, contacting you about administrative matters, and responding to queries, complaints, or correspondence you send us. We may also use Transaction Data, Contact Data, and Device/Network Data collected in this context for our Commercial Purposes (which may include data sales or “sharing”).

C. VISITING OUR PROPERTIES

We process Identity Data, Transaction Data, Payment Data, Preference Data, General Location Data, and Contact Data when you visit one of our properties, such as our golf courses or other venues. If provided (e.g. due to an allergy or for disability accommodations) or due to an incident at our properties, we may also process Health Data. We may collect Audio/Visual Data in relation to the use of CCTV cameras.

We process Identity Data, Transaction Data, Payment Data, Preference Data, General Location Data Audio/Visual Data, and Contact Data as necessary to operate our properties and provide our services to you, for our Business Purposes, and our other legitimate interests, including:

- verifying your identity for authentication and security purposes;
- helping us to ensure our customers are genuine and to prevent fraud;
- to help us to return lost property to its rightful owner; and

- managing access to specific areas of our properties.

We process Health Data only as necessary to provide you with appropriate services (for example, a wheelchair accessible space, or a sign language interpreter) or to help us investigate an incident which may have taken place at our properties, and for certain Business Purposes.

We use Identity Data, Transaction Data, Preference Data, and Contact Data collected in this context for our Commercial Purposes (which may include data sales or “sharing”). We do not sell or “share” Payment Data, Health Data, or Audio/Visual Data.

D. *MARKETING COMMUNICATIONS*

We process Device/Network Data, Contact Data, Identity Data, and Inference Data in connection with marketing emails, SMS, push notifications, telemarketing, or similar communications, and when you open or interact with those communications. You may receive marketing communications if you consent and, in some jurisdictions, as a result of account registration or a purchase.

We process Personal Data collected in this context to contact you about relevant products or services and for our Business Purposes. We may use this data for our Commercial Purposes (which may include data sales or “sharing”). Marketing communications may also be personalized as permitted by applicable law. See your Rights & Choices for information about how to control our marketing communications.

E. *OUR PROPERTIES AND OFFLINE SERVICES*

We process Identity Data, Transaction Data, Payment Data, Inference Data, General Location Data, and Contact Data when you use our Offline Services or visit our properties. We may collect Audio/Visual Data in relation to the use of CCTV cameras.

We process Identity Data, Transaction Data, Payment Data, Inference Data, General Location Data Audio/Visual Data, and Contact Data collected in this context as necessary to operate our properties and provide our Offline Services to you, for our Business Purposes, and our other legitimate interests, including, e.g. verifying your age or identity, or to help us to return lost property to its rightful owner. We may also use Identity Data, Transaction Data, Inference Data, and Contact Data collected in this context for our Commercial Purposes (which may include data sales or “sharing”).

F. *DIGITAL SERVICES*

GENERALLY

When you use our Digital Services, we may process Device/Network Data, Contact Data, Identity Data, General Location Data, and Inference Data. You may also be able to complete purchases, register for an account, or enroll in marketing communications through our Digital Services (as described further above).

We use Personal Data collected in this context as necessary to operate our Services, such as keeping you logged in, delivering pages, etc., for our Business Purposes, and our other legitimate interests, such as to deliver content to you efficiently, or to create logs used to ensure the security of our Websites and other technology systems. We may process this Personal Data for our Commercial Purposes (which may include data sales or “sharing”).

APPS

If you use our Apps, such as GolfLogix, we may process Identity Data, Device/Network Data, Inference Data, General Location Data, and, with your consent, Precise Location Data.

We process this Personal Data to provide our Apps, for our Business Purposes, and our other legitimate interests, such as to optimize the display and functionality of the Apps on your device. We process Precise Location Data as necessary to provide the Services you request, or as necessary to provide our Services, for example:

- to determine your location when using the Apps;
- to provide navigation/direction services, relevant location-specific information to you or deliver other features that require the use of Precise Location Data;
- to validate your location for compliance, or to ensure eligibility to receive certain features/content of our Services; and
- to create aggregate information about users’ location and patterns, which we use to help improve our Services.

We may also process Identity Data, Device/Network Data, Inference Data, General Location Data collected in this context for our Commercial Purposes (which may include data sales or “sharing”). You have the right to limit our use of Precise Location Data by withdrawing consent to or disabling the collection of Precise Location Data.

COOKIES AND SIMILAR TECHNOLOGIES

We use cookies and similar technologies (such as web beacons or pixels) on our Digital Services. These technologies can be used to collect or create Device/Network Data, Identity Data, Contact Data, or Inference Data. Third parties may be allowed to view, edit, or set their own cookies or similar technologies on or through our Websites. Some of these technologies can be used by us and/or our third party partners to identify you across platforms, devices, sites, and services.

We and our third parties may use cookies and similar technologies for the following purposes:

- for “essential” or “functional” purposes, such as to maintain user sessions, deliver Website content or services you request, or to enable certain features of our Services (for example, to allow a customer to maintain a shopping cart);
- for “analytics” purposes, such as to analyze the traffic to and usage of our Services (for example, how many people have looked at a page, how visitors move around the Websites, what website they visited prior to visiting our Websites, and use this information to understand user behaviors and improve the design and functionality of the Websites);
- In connection with Targeted Advertising, Targeted Marketing, and Partner Marketing on our Digital Services or third-party websites/services; and
- for social media integration e.g. via third-party social media cookies, or when you share information using a social media sharing button or “like” button on our Services or you link your account or engage with our content on or through a social networking website such as Facebook or Twitter.

We may also use your Device/Network Data, Inference Data and Contact Data collected in this context for Business Purposes and Commercial Purposes (which may include data sales or “sharing”).

See your Rights & Choices for information regarding opt-out rights for cookies and similar technologies. If you wish, you can manage/deny cookies and similar technologies using your browser’s settings menu. Some devices allow you to control this through your device settings. If you limit our use of cookies and similar technologies, our Services may not function properly and certain services may not be available to you.

Third parties may view, edit, or set their own cookies or place web beacons on our websites. We, or third party providers, may be able to use these technologies to identify you across platforms, devices, sites, and services. Third parties may engage in Targeted Advertising using this data. Social Media companies and third parties engaged in Targeted Advertising are separate “controllers” or businesses, these parties may each have their own privacy policies and their processing of Personal Data is not subject to this Privacy Policy.

DISPLAY ADVERTISING

We and our third party providers show advertisements on some of our Digital Services. When we show advertisements, we process data using Cookies and Similar Technologies, including Device/Network Data, Identity Data (e.g. unique IDs), or Inference Data, as

well as data related to your use of our Digital Services, and purchases or transactions, each as described further above. Please note that Personal Data processed in this context does not generally contain data that directly identifies you.

We share the Personal Data collected in this context with third party advertising vendors, and both 8AM and those vendors may use that personal data for Targeted Advertising, Targeted Marketing, and other and Commercial Purposes (which may include data sales or “sharing”). See the Rights and Choices section below for more information regarding your choices regarding data processing in relation to display advertising. Please note that, if you opt-out of Targeted Advertising, you may still see contextual advertisements on our Digital Services.

Third parties may deliver ads thorough our Digital Services and on other services you may use. We or third party providers may be able to use these technologies to identify you across platforms, devices, sites, and services. These third parties are separate “controllers” or businesses, these parties each have their own privacy policies and their processing of Personal Data is not subject to this Privacy Policy.

G. CONTESTS AND PROMOTIONS

We may collect and process Identity Data, Contact Data, Inference Data, and User Content in connection with your entry into contests, sweepstakes or similar promotions. In some cases, we may collect Government ID Data as necessary to validate your identity or to send you relevant documentation relating to your entry into the contest/sweepstakes or receipt of any prizes.

We Personal Data collected in this context as necessary to process your request to enter a contest or promotion, notify you if you have won, to deliver a prize, for our Business Purposes and other related purposes. In addition, we may process this information to verify your identity for authentication and security purposes, and helping us to prevent fraud. If you win a contest/sweepstakes, we may publicly post some of your Personal Data on our Service (e.g. by posting a name or username on our winners’ page).

Unless prohibited by law, and subject to the rules applicable to the contest/sweepstakes, we may use Identity Data, Contact Data, Inference Data, and User Content collected in this context for Commercial Purposes (which may include data sharing). If we collect it, we use Government ID Data only as necessary to verify your identity, or for appropriate security, anti-fraud, or compliance purposes.

H. SUBMISSION OF CONTENT; CONTACT US

We may collect and process Biographical Data, Identity Data, Contact Data, and any Audio/Visual when you contact us through the site, or otherwise submit content to us directly.

We process Personal Data collected in such contexts as necessary to address your request, fulfill the Business Purposes for which that information was provided or for other related purposes, including but not limited to communicating with you on behalf of the 8AM Companies. Additionally where you consent, if relevant to your request, or if otherwise permitted by law, we may send you marketing communications as described further below, and use this information for Commercial Purposes (which may include data sales or “sharing”).

I. FEEDBACK AND SURVEYS

We may process Identity Data, Contact Data, Inference Data, and User Content collected in connection with customer surveys or questionnaires.

We generally process this Personal Data as necessary to respond to customer requests/concerns, for our Business Purposes, and other legitimate interests. We may store and analyze feedback for our purposes, for example, to personalize the Services, and help recommend relevant offers or services. We may also use the Contact Data, Inference Data, and User Content collected in this context for Commercial Purposes (which may include data sales or “sharing”).

7. PROCESSING PURPOSES

A. Business Purposes

We and our service providers process Personal Data we hold for numerous business purposes, depending on the context of collection, your Rights & Choices, and our legitimate interests. We generally process Personal Data for the following “**Business Purposes**.”

SERVICE PROVISION AND CONTRACTUAL OBLIGATIONS

We process any Personal Data as is necessary to provide our Services, to provide you with the products you purchase, to authenticate users, and as otherwise necessary to fulfill our contractual obligations to you. Additionally, we may use Personal Data as necessary to audit compliance, and log or measure aspects of service delivery (e.g. to create access logs, or document ad impressions and conversions).

INTERNAL PROCESSING AND SERVICE IMPROVEMENT

We may use Personal Data for improving our Services, understanding how our Services are used, for customer service purposes, in connection with logs and metadata relating to service use, and for debugging, and similar purposes.

SECURITY AND INCIDENT DETECTION

We may process Personal Data to improve the security of our Services, to identify and prevent crime, fraud, or unauthorized activity. We may analyze network traffic, device patterns and characteristics, maintain and analyze logs and process similar Personal Data in connection with our information security activities.

COMPLIANCE, HEALTH, SAFETY, AND PUBLIC INTEREST

We may also process any Personal Data as necessary to comply with our legal obligations, such as where you exercise your rights under data protection law and make requests, for the establishment and defense of legal claims, or where we must comply with our legal obligations, lawful requests from government or law enforcement officials, and as may be required to meet national security or law enforcement requirements or prevent illegal activity. We may also process data to protect the vital interests of individuals, or on certain public interest grounds, each to the extent allowed under applicable law.

AGGREGATED DATA

We process Personal Data about our customers and users in to create aggregated and anonymized data that we use to identify trends, such as about buying and spending habits, use of our Services, and other similar information (“**Aggregated Data**”). We may pass Aggregated Data to certain third parties to give them a better understanding of our business and to improve our Services. Aggregated Data will not contain information from which you may be personally identified.

PERSONALIZATION

We may personalize or customize aspects of the Services based on your interactions with our Services, your account, and other settings or configuration option that you may select (e.g. your content preferences). This processing may involve the creation and use of Inference Data relating to your preferences.

B. Commercial Purposes

We and certain third parties process Personal Data to further our commercial or economic interests (“**Commercial Purposes**,”) depending on the context of collection and your [Rights & Choices](#).

Please Note – We may require your consent, or we may not engage in processing of Personal Data for Commercial Purposes in some jurisdictions. Some of this processing may involve “sharing” or “sales” of Personal Data. See the “[Regional Supplements](#)” section below for more information.

CONTEXTUAL ADVERTISING

We may display contextual advertising on our Services. In which case, we may customize such advertisement using data processed based on your current interaction with the Service (e.g. time, adjacent content, or General Location). Note that we document and audit ad impressions and conversations and related data relating to the delivery and display of contextual advertisements.

CONSUMER PROFILES

In order to understand our customers' preferences, and better recommend products and services to our prior customers, we may create a "**Consumer Profile**" by linking together and analyzing Personal Data (excluding Sensitive Personal Data) collected in the various contexts as described in this Privacy Policy. We may also augment Consumer Profiles with Personal Data that we create (such as Inference Data) or that we receive from third parties, and may include Personal Data such as products you have purchased.

We use Consumer Profiles for market research and in connection with the improvement of our Services. For example, we may analyze the Personal Data of people who have made a purchase for a particular item in the past and compare them with other people in our database. If we identify people in the database who have similar Personal Data to the previous customers, we may then target marketing or content to the new people.

PERSONALIZED MARKETING COMMUNICATIONS

Our marketing communications may be personalized based on your Consumer Profile. Where allowed, our marketing communications may involve Targeted Marketing.

TARGETED ADVERTISING

We and our third party advertising providers may engage in display advertising or place third party advertisements for third parties' products and services on our Digital Services. Such advertising may involve the processing of Personal Data in order to tailor the advertisements you see based on your interests ("**Targeted Advertising**"). The profiles and interests used for Targeted Advertising may be inferred or derived from Personal Data that we or those third parties obtain or infer from your activities across non-affiliated websites, applications, or services (e.g. through Cookies and Similar Technologies). Note that Targeted Advertising includes various parties and service providers, including third party data controllers, engaged in the processing of Personal Data in connection with Targeted Advertising. These parties may be able to identify you across sites, devices, and over time. In some cases, these third parties may build or augment user profiles using your Personal Data, and may track whether you view, interact with, or how often you have seen an ad, or whether you purchased advertised goods or services.

TARGETED MARKETING

We market our products and services to our customers and users. We may market our products and Services to you directly, or on third party sites and services, based on Personal Data processed by us or our third party partners (“**Targeted Marketing**”). We generally use Targeted Marketing for the purpose of marketing our Services and third-party goods and services to you on third party services, e.g. through the purchase of ads displayed on third party services (e.g. websites or social media platform) to individual who have used our Services or purchased products from us. These advertisements may be enabled through a third party’s own use of Targeted Advertising (and you may need to opt-out of Targeted Advertising on third parties’ services with the relevant third party)

Targeted Marketing involves the processing of Personal Data derived from Personalization, Consumer Profiles, and Marketing Communications, and our use of Cookies and Similar Technologies.

PARTNER MARKETING

We engage in marketing campaigns in collaboration with or on behalf of unaffiliated brands and we may sell or grant access to Personal Data to our marketing partners, and other advertisers in connection with joint promotions, and other marketing initiatives with unaffiliated businesses (“**Partner Marketing**”). For example, we may direct ads or marketing communications on our Services to users that have used a marketing partner’s products or services, or that we believe are likely to do so. Similarly, our partners may advertise to you based on information we provide to them, including Personal Data collected through your use of our Services. Partner Marketing may involve the augmentation or disclosure of Personal Data processed in connection with Personalization, Consumer Profiles, Marketing Communications, and our use of Cookies and Similar Technologies.

8. DISCLOSURE/SHARING OF PERSONAL DATA

Information we collect may be disclosed to or shared with a variety of parties, depending upon the purpose for and context in which that information was provided. We generally transfer data to the categories of recipients or in connection with specific business purposes, each described below.

8AM COMPANIES

In order to streamline certain business operations, operate promotions and deliver content we believe would be of interest to you, in connection with our marketing operations, and product development activity and our other legitimate interests and Commercial Purposes, we may share your Personal Data with any of our current or future affiliated entities, subsidiaries, and parent companies, including any 8AM Companies.

SERVICE PROVIDERS AND CONTRACTORS

In connection with our general business operations, product/service improvements, to enable certain features, and in connection with our other legitimate interests, we may share Personal Data with service providers, contractors, or subprocessors who provide certain services or process data on our behalf.

BRAND PARTNERS, ADVERTISERS, AND SOCIAL MEDIA PLATFORMS

We may share certain Personal Data with brand partners, social media platforms, advertisers, ad exchanges, data management platforms, or brand partners in support of our Business Purposes and Commercial Purposes. We may allow these third parties to operate on or through our Services.

DATA AGGREGATORS

We may share Personal Data with data aggregators in support of our Commercial Purposes, e.g. to enhance Consumer Profiles, Personalization, and our Marketing Communications. These disclosures/sales can help better personalize our Services, the services of third parties, enrich customer profiles, and help ensure that you see advertisements that are more relevant to your interests.

CORPORATE EVENTS

Your Personal Data may be processed in the event that we go through a business transition, such as a merger, acquisition, liquidation, or sale of all or a portion of our assets. For example, Personal Data may be part of the assets transferred, or may be disclosed (subject to confidentiality restrictions) during the due diligence process for a potential transaction.

LEGAL DISCLOSURES

In limited circumstances, we may, without notice or your consent, access and disclose your Personal Data, any communications sent or received by you, and any other information that we may have about you to the extent we believe such disclosure is legally required, in response to judicial process to courts of competent jurisdiction, to prevent or respond to a crime, to investigate violations of agreements or applicable law, or in the vital interests of us or any person.

Note: These disclosures may be made to governments that do not ensure the same degree of protection of your Personal Data as your home jurisdiction. We may, in our sole discretion (but without any obligation), object to the disclosure of your Personal Data to such parties.

9. RIGHTS & CHOICES

You may have certain rights and choices regarding the Personal Data we process. Please note these rights may vary based on the country or state where you reside, and our obligations under applicable law. See the following sections for more information regarding your rights/choices in specific regions:

- [US States/California](#)
- [EEA/UK/Switzerland](#)
- [Australia](#)

A. *Your Rights*

You may have certain rights and choices regarding the Personal Data we process. See the “[Regional Supplement](#)” section below for rights available to you in your jurisdiction. To submit a request, [Contact Us](#). We verify your identity in connection with most requests, as described below.

B. *Verification of Requests*

All rights requests must be verified. We may require that you provide the email address we have on file for you (and verify that you can access that email account) as well as other data we have on file, in order to verify your identity. If an agent is submitting the request on your behalf, we reserve the right to validate the agent’s authority to act on your behalf.

C. *Your Choices*

MARKETING COMMUNICATIONS

You can withdraw your consent to receive marketing communications by clicking on the unsubscribe link in an email or by submitting an [8AM Companies Privacy Request Form](#).

WITHDRAWING YOUR CONSENT/OPT-OUT

Where we are processing your Personal Data based on your consent, you may change your mind and withdraw your consent at any time. The consequence of you withdrawing consent might be that we cannot perform certain Services for you. Note that you may control or limit Precise Location Data that we collect through our Services by changing your preferences in your device’s location services preferences menu, or through your choices regarding the use of Bluetooth, WiFi, and other network interfaces you may use to interact with our Services. Note, we may collect General Location Data even if you opt out of the collection of Precise Location Data.

COOKIES, SIMILAR TECHNOLOGIES, AND TARGETING

GENERAL

If you do not want information collected through the use of cookies, you can manage/deny cookies (and certain technologies) using your browser's settings menu or our [Manage Cookies](#) page. You may need to opt out of third-party services directly via the third party. For example, to opt-out of Google's analytic and marketing services, visit [Google Analytics Terms of Use](#), the [Google Policy](#), or [Google Analytics Opt-out](#).

TARGETING

You may submit a request to opt out or withdraw your consent to Targeted Marketing, Targeted Advertising, and Partner Marketing by visiting the [8AM Companies Privacy Request Form](#) and (with respect to our use of Cookies and Similar Technologies for Targeted Advertising, Targeted Marketing, and Partner Marketing purposes) using our Cookie Management Platform. In some cases, you may be able to opt-out by submitting requests to third party partners, including for the vendors listed below:

- [Google Ads](#)
- [Facebook Custom Audience Pixel](#)
- [Twitter Audience Pixel](#)
- [Digital Advertising Alliance's opt-out](#)
- [Network Advertising Initiative opt-out](#)

GLOBAL PRIVACY CONTROL (GPC)

Our Websites may support certain automated opt-out controls, such as the [Global Privacy Control](#) ("GPC"). GPC is a specification designed to allow internet users to notify businesses of their privacy preferences, such as opting-out of the sale or "sharing" of Personal Data (which generally includes our use of Cookies and Similar Technologies for Targeted Advertising, Targeted Marketing, and Partner Marketing purposes). To activate GPC, users must enable a setting or use an extension in the user's browser or mobile device. Please review your browser or device settings for more information regarding how to enable GPC.

Please note: We may not be able to link GPC requests to your Personal Data in our systems, and as a result, some sales or "sharing" of your Personal Data may occur even if GPC is active. See the "Regional Supplements" section below for more information about how to submit requests to opt-out of sales or "sharing" of your Personal Data.

DO-NOT-TRACK

Our Services do not respond to your browser's do-not-track request.

10. HOW WE PROTECT YOUR PERSONAL DATA

While we endeavor to protect our systems, sites, operations and information against unauthorized access, use, modification and disclosure, we cannot guarantee that any information, during transmission or while stored on our systems, will be absolutely safe from intrusion by others.

11. HOW LONG WE RETAIN YOUR PERSONAL DATA

We retain Personal Data for so long as it is reasonably necessary to achieve the relevant processing purposes described in this Privacy Policy, or for so long as is required by law. What is necessary may vary depending on the context and purpose of processing. We generally consider the following factors when we determine how long to retain data (without limitation):

- Retention periods established under applicable law;
- Industry best practices;
- Whether the purpose of processing is reasonably likely to justify further processing;
- Risks to individual privacy in continued processing;
- Applicable data protection impact assessments;
- IT systems design considerations/limitations; and
- The costs associated continued processing, retention, and deletion.

We will review retention periods periodically and may pseudonymize or anonymize data held for longer periods.

12. CHILDREN

Our Website is not intended for children under 18 years of age. We do not knowingly collect personal information from an individual under age 18. If you are under the age of 18, please do not submit any personal information through the Website. If you have reason to believe that we may have accidentally received personal information from an individual under age 18, please contact us immediately by submitting an [8AM Companies Privacy Request Form](#) or calling us at (855) 929-4081.

13. THIRD PARTY WEBSITES AND MOBILE APPLICATIONS

We are not responsible for the privacy policies, content or security of any linked third party websites or mobile applications. We recommend that you check the privacy and security policies of each and every website and mobile application that you visit.

14. CHANGES TO OUR PRIVACY POLICY

We reserve the right to change our Privacy Policy from time to time. Any such changes will be posted on this page. Your continued use of our Services constitutes your acceptance of any revised Privacy Policy.

15. INTERNATIONAL TRANSFERS OF PERSONAL DATA

We process data in the United States, and other countries where our subprocessors are located. In cases where we transfer Personal Data to jurisdiction that have not been determined to provide “adequate” protections by your home jurisdiction, we will put in place appropriate safeguards to ensure that your Personal Data are properly protected and processed only in accordance with applicable law. Those safeguards may include the use of EU standard contractual clauses, reliance on the recipient’s Binding Corporate Rules program, or requiring the recipient to certify to a recognized adequacy framework. We make transfers among 8AM Companies pursuant to our intragroup Standard Contractual Clauses. You can [Contact Us](#) to obtain more information about transfer measures we use for specific transfers.

16. REGIONAL SUPPLEMENTS

A. US States / Your California Privacy Rights

Click the following link to review our disclosure relating to [Data Retention](#).

DATA RIGHTS

Under the California Consumer Privacy Act (“**CCPA**”) and other state privacy laws, residents of certain US states may have the following rights, subject to your submission of an appropriately verified request:

CONFIRM

Right to confirm whether we process your Personal Data.

ACCESS/KNOW

Right to request any of following: (1) the categories of Personal Data we have collected, sold or “shared,” or disclosed for a commercial purpose; (2) the categories of sources from which your Personal Data was collected; (3) the purposes for which we collected or sold or “shared” your Personal Data; (4) the categories of third parties to whom we have sold or “shared” your Personal Data, or disclosed it for a business purpose; and (5) the specific pieces of Personal Data we have collected about you.

PORTABILITY

Right to request that we provide certain Personal Data in a common, portable format.

DELETION

Right to delete certain Personal Data that we hold about you.

CORRECTION

Right to correct certain Personal Data that we hold about you.

OPT-OUT (SALES, SHARING, TARGETED ADVERTISING, PROFILING)

Right to opt-out of the following:

- If we engage in sales of data (as defined by applicable law), you may direct us to stop selling Personal Data.
- If we engage in Targeted Advertising (aka “sharing” of personal data or cross-context behavioral advertising,) you may opt-out of such processing.
- If we engage in certain forms of “profiling” (e.g. profiling that has legal or similarly significant effects), you may opt-out of such processing.

OPT-OUT OR LIMIT USE AND DISCLOSURE OF SENSITIVE PERSONAL DATA

Right to opt-out of the processing of certain Sensitive Data, or request that we limit certain uses of Sensitive Personal Data. This right does not apply in cases where we only use Sensitive Personal Data where necessary, or for certain business purposes authorized by applicable law.

OPT-IN/OPT-OUT OF SALE/SHARING OF MINORS' PERSONAL DATA

To the extent we have actual knowledge that we collect or maintain personal information of a minor under age 16 in California, those minors must opt in to any sales or “sharing” of personal information (as defined under CCPA), and minors under the age of 13 must have a parent consent to sales or “sharing” of personal information. All minors have the right to opt-out later at any time.

NON-DISCRIMINATION

California residents have the right to not to receive discriminatory treatment as a result of your exercise of rights conferred by the CCPA.

LIST OF DIRECT MARKETERS

California residents may request a list of Personal Data we have disclosed about you to third parties for direct marketing purposes during the preceding calendar year.

REMOVE MINORS' USER CONTENT

Residents of California under the age of 18 can delete or remove posts using the same deletion or removal procedures described above, or otherwise made available through the Services. If you have questions about how to remove your posts or if you would like additional assistance with deletion, contact us using the information below. We will work to delete your information, but we cannot guarantee comprehensive removal of that content or information posted through the Services.

SUBMISSION OF REQUESTS

You may submit requests, as follows (please our review [verification requirements](#) section). If you have any questions or wish to appeal any refusal to take action in response to a rights request, contact us at privacy@8amgolf.com. We will respond to any request to appeal within the time period required by law:

<p>Access/Know; Confirm Processing; Portability; Deletion; Opt-Out of Sale or Sharing for Behavioral Advertising; Correction</p>	<ul style="list-style-type: none">• You may visit our 8AM Companies Privacy Request Form• You may call us at: (855) 929-4081. You will be directed to leave a voicemail where you will provide your email address, phone number and address we have on file, along with your request.• Contact us via email to our privacy team at one of the email address listed below.• <i>Note:</i> To limit the use and disclosure of Precise Location Data, update your preferences for location data using your device’s settings menu, or disable WiFi, Bluetooth, or other interfaces you use to interact with our Services.• <i>Note:</i> You may enable Global Privacy Control (GPC) to opt out of data sales or “sharing” using Cookies and Similar Technologies. Services supporting GPC (or similar standards) will treat the request as a request to opt-out of such sales or “sharing”
<p>List of Direct Marketers; Remove Minors' User Content</p>	<ul style="list-style-type: none">• Contact us via email to our privacy team at one of the email address listed below.

You may submit requests to a specific 8AM brand as follows:

Company Name	EMAIL	Toll-Free Phone
3s Greenville	privacy@3s.golf	(855) 929-4081
8AM Golf Holdings, LLC; ECC Golf Holdings, Inc.	privacy@8amgolf.com	
Chirp Golf LLC	privacy@chirpgolf.io	
Club Conex	privacy@clubconex.com	
Fairway Jockey	privacy@fairwayjockey.com	
Golf.com; Golf Magazine; EB Golf Media LLC	privacy@golf.com	
GolfLogix, Inc.	privacy@golflogix.com	
Miura Golf LLC	privacy@miuragolf.com	
Nicklaus Companies	privacy@nicklaus.com	
True Spec Golf	privacy@truespecgolf.com	
T-Squared Social	privacy@tsquaredsocial.com	

CATEGORIES OF PERSONAL DATA DISCLOSED FOR BUSINESS PURPOSES

For purposes of the CCPA, we have disclosed to Service Providers for “business purposes” in the preceding 12 months the following categories of Personal Data, to the following categories of recipients:

Category of Personal Data	Category of Recipients (see “Disclosure/Sharing” above for more information)
Audio/Visual Data Biographical Data Contact Data Device/Network Data General Location Data Identity Data Inference Data Transactional Data User Content	8AM Companies; Service Providers and Contractors; Brand Partners, Advertisers, and Social Media Platforms; Data Aggregators; Corporate Events; Legal Disclosure
Government ID Data Health Data Payment Data Precise Location Data	8AM Companies

CATEGORIES OF PERSONAL DATA SOLD, “SHARED,” OR DISCLOSED FOR COMMERCIAL PURPOSES

For purposes of the CCPA, we have “sold” or “shared” in the preceding 12 months the following categories of Personal Data in the, to the following categories of recipients:

Category of Personal Data	Category of Recipients (see “Disclosure/Sharing” above for more information)
Biographical Data Contact Data Device/Network Data General Location Data Identity Data	Service Providers and Contractors; Data Aggregators; Brand Partners, Advertisers, and Social Media Platforms

Inference Data Transaction Data User Content	
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CATEGORIES OF SENSITIVE PERSONAL DATA USED OR DISCLOSED

For purposes of CCPA, we may use or disclose the following categories of Sensitive Personal Data: Government ID Data, Health Data, Payment Data, and Precise Location Data. We do not sell or “share” Sensitive Personal Data.

B. EEA/UK/Switzerland

CONTROLLER

The controller of Personal Data relating to residents of the UK/EEA/Switzerland is 8AM Golf Holdings, LLC, 6 East 43rd Street, New York, NY 10017.

PRIVACY RIGHTS

Users based in the EEA/UK/Switzerland have the following legal rights with respect to their information:

ACCESS

You may have a right to access the Personal Data we process.

RECTIFICATION

You may correct any Personal Data that you believe is inaccurate.

DELETION

You may request that we delete your Personal Data. We may delete your data entirely, or we may anonymize or aggregate your information such that it no longer reasonably identifies you.

DATA EXPORT

You may request that we send you a copy of your Personal Data in a common portable format of our choice.

RESTRICTION

You may request that we restrict the processing of personal data to what is necessary for a lawful basis.

OBJECTION

You may have the right under applicable law to object to any processing of Personal Data based on our legitimate interests. We may not cease or limit processing based solely on that objection, and we may continue processing where our interests in processing are appropriately balanced against individuals' privacy interests. In addition to the general objection right, you may have the right to object to processing:

- for Profiling purposes;
- for direct marketing purposes (we will cease processing upon your objection); and
- involving automated decision-making with legal or similarly significant effects (if any).

REGULATOR CONTACT

You have the right to file a complaint with regulators about our processing of Personal Data. To do so, please contact your local data protection or consumer protection authority.

SUBMISSION OF REQUESTS

<p>Access, Rectification, Data Export, Deletion, Restriction, or Correction:</p>	<ul style="list-style-type: none"> • Contact us via email to our privacy team at privacy@8amgolf.com or via the brand contact info listed below. • You may send postal mail to our physical address (see Contact Us) with your email address, phone number and (if applicable) address we have on file, along with your request.
<p>Restriction; all others:</p>	<ul style="list-style-type: none"> • Contact us via email to our privacy team at privacy@8amgolf.com or via the brand contact info listed below.

You may contact a specific 8AM brand as follows:

Company Name	EMAIL
3s Greenville	privacy@3s.golf
8AM Golf Holdings, LLC;	privacy@8amgolf.com

ECC Golf Holdings, Inc.	
Chirp Golf LLC	privacy@chirpgolf.io
Club Conex	privacy@clubconex.com
Fairway Jockey	privacy@fairwayjockey.com
Golf.com; Golf Magazine; EB Golf Media LLC	privacy@golf.com
GolfLogix, Inc.	privacy@golflogix.com
Miura Golf LLC	privacy@miuragolf.com
Nicklaus Companies	privacy@nicklaus.com
True Spec Golf	privacy@truespecgolf.com
T-Squared Social	privacy@tsquaredsocial.com

LEGAL BASES FOR PROCESSING

<i>Legal Basis</i>	Description of Basis & Relevant Purposes	Relevant Contexts / Purposes / Disclosures
<i>Performance of a contract</i>	The processing of your Personal Data is strictly necessary in the context in which it was provided, e.g. to perform the agreement you have with us, to provide products and services to you, to open and maintain your user accounts,	<u>Contexts</u>

	<p>to deliver products or services you have purchased, or process requests.</p>	<ul style="list-style-type: none"> • Any context where Personal Data (excluding Sensitive Personal Data) is processed for purpose(s) listed below • Cookies and other tracking technologies (strictly necessary) <p><u>Purposes</u></p> <ul style="list-style-type: none"> • Service Provision and Contractual Obligations <p><u>Disclosures</u></p> <ul style="list-style-type: none"> • 8AM Companies • Service Providers and Contractors
<p><i>Legitimate interests</i></p>	<p>This processing is based on our legitimate interests. For example, we rely on our legitimate interest to administer, analyze and improve our Websites and related content, to operate our business including through the use of service providers and subcontractors, to send you notifications about our Websites or products you have purchase, for archiving, recordkeeping, statistical and analytical purposes, and to use your Personal Data for administrative, fraud detection, audit, training, security, or legal purposes. See the <u>Business Purposes</u> of Processing section above for more information regarding the nature of processing performed on the basis of our legitimate interests.</p>	<p><u>Contexts</u></p> <ul style="list-style-type: none"> • Any context where Personal Data (excluding Sensitive Personal Data) is processed for purpose(s) listed below <p><u>Purposes</u></p> <ul style="list-style-type: none"> • <u>Business Purposes</u> <p><u>Disclosures</u></p> <ul style="list-style-type: none"> • 8AM Companies • Service Providers and Contractors • Data Aggregators • Corporate Events • Legal Disclosures
<p><i>Consent</i></p>	<p>This processing is based on your consent. You are free to withdraw any consent you may have provided, at any time, subject to your Rights & Choices, and any right to continue processing on alternative or additional legal bases.</p>	<p><u>Contexts</u></p> <ul style="list-style-type: none"> • Any context where Personal Data (excluding Sensitive Personal Data) is processed for purpose(s) listed below

	<p>Withdrawal of consent does not affect the lawfulness of processing undertaken prior to withdrawal.</p>	<ul style="list-style-type: none"> • Cookies and other tracking technologies (except strictly necessary) • Processing of Sensitive Personal Data • Marketing communications <p><u>Purposes</u></p> <ul style="list-style-type: none"> • Marketing Communications • Targeted Advertising • Targeted Marketing • Partner Marketing <p><u>Disclosures</u></p> <ul style="list-style-type: none"> • Brand Partners, Advertisers, and Social Media Platforms
<p><i>Compliance with legal obligations</i></p>	<p>This processing is based on our need to comply with legal obligations. We may use your Personal Data to comply with legal obligations to which we are subject, including to comply with legal process. See the <u>Business Purposes</u> of Processing section above for more information regarding the nature of processing performed for compliance purposes.</p>	<p><u>Business Purposes</u></p> <ul style="list-style-type: none"> • Security and Incident Detection • Compliance, Health, Safety, and Public Interest <p><u>Disclosures</u></p> <ul style="list-style-type: none"> • Legal Disclosures
<p><i>Performance of a task carried out in the public interest</i></p>	<p>This processing is based on our need to protect recognized public interests. We may use your Personal Data to perform a task in the public interest or that is in the vital interests of an individual. See the <u>Business Purposes</u> of Processing section above for more information regarding the nature of processing performed for such purposes.</p>	<p><u>Business Purposes</u></p> <ul style="list-style-type: none"> • Compliance, Health, Safety, and Public Interest <p><u>Disclosures</u></p> <ul style="list-style-type: none"> • Legal Disclosures

C. *Australia*

RIGHTS AND CHOICES

Residents of Australia have the right under the Privacy Act to request access or correct Personal Data we hold about you. If you wish to exercise your right under the Privacy Act to access or correct your Personal Data, you may email us at privacy@8amgolf.com, or email a specific brand [here](#). If you make a request, we will require you to verify your identity before we provide you with any access, as described in the [verification requirements](#) section.

PURPOSES OF PROCESSING

In certain cases, we may not automatically process your Personal Data for certain purposes. We rely on your consent to process Personal Data as follows:

CONTEXTS

Account Registration; Purchases and Transactions; Marketing Communications; Visiting our Properties; Digital Services; Contests and Promotions; Submission of Content; Contact Us; Feedback and Surveys

PURPOSES

- Marketing Communications
- Targeted Advertising
- Targeted Marketing
- Partner Marketing

DISCLOSURES

- 8AM Companies
- Brand Partners, Advertisers, and Social Media Platforms
- Data Aggregators

REGULATORY CONTACT

You may contact the Office of the Australian Information Commissioner (OAIC) or you may [Contact Us](#) with any complaints regarding our privacy practices. We will respond to complaints we receive in a timely manner and ensure our processing aligns with your rights and our legal obligations.

