



PRIVACY POLICY

The Royal Canadian Golf Association, operating as Golf Canada (“Golf Canada” or “we” or “us” or “our”), recognizes the importance our members, donors, customers, volunteers, spectators, visitors to our websites, Score Centre™, and users of our mobile applications place on the privacy of their information (collectively referred herein to “you” or “yours” or “users” or “individuals”).

The Golf Canada Foundation, a separate legal entity that is administered in part by Golf Canada, has adopted this Privacy Policy in its entirety. All references to Golf Canada can and shall be replaced with “Golf Canada Foundation” in transactions or data collection conducted by the Golf Canada Foundation.

This Privacy Policy (“Policy”) demonstrates our firm commitment to protecting the privacy of your information, as described below. Providing exceptional services involves collecting, using, and sharing Personal Information about individuals. This Policy outlines how we protect your Personal Information, which is one of our highest priorities.

For this Policy, “Personal Information” means information about an identifiable individual (e.g. name, email address) or information that can be used to identify an individual or as further defined in applicable laws.

World Handicap System:

Golf Canada is the authorized national body responsible for implementing and administering the Rules of Handicapping in Canada in cooperation with provincial golf associations. Golf Canada is the only licensed association in Canada to provide an official calculated Handicap Index in accordance with the World Handicap System (WHS), which was launched in 2020. For detailed information regarding how we collect, use and share Personal Information with the World Handicap System, and what your rights are as it relates to the information we share with the WHS, please refer to the [FAQ: World Handicap System \(WHS\) and Your Information](#).

Who Does This Policy Apply To?

Golf Canada collects, protects, uses, and shares information gathered from our interactions with you through the use of our products, services, visits to our websites, including, www.golfcanada.ca, <https://ecom.golfcanada.ca/>, <https://scg.golfcanada.ca/> (the “Websites” or the “Golf Canada Websites”), use of our mobile application (the “App”), and when you otherwise interact with us (collectively referred to as “Services”).

Our Websites and App may contain links to other third-party sites. When you click on one of these links, you are visiting a website operated by someone other than us, and the operator of that website may have different privacy policies. We are not responsible for the privacy practices of those sites. We encourage you to investigate the privacy policies of these third-party operators.

Policy Changes:

This Policy was last updated April 7, 2022. We keep our Policy under regular review. We suggest that you review this Policy periodically as we may modify it from time to time as our Services evolve or as required by applicable laws.

What Personal Information We Collect and How We Collect It?

Information you provide to us:

When you use our Websites, App, or Services, you may be asked or you may choose to provide us with your Personal Information, which may include:

- Information for registration purposes such as your name, gender, membership category, email address, contact numbers, date of birth, and postal address. We may occasionally ask you for demographic information to have a better understanding of our membership and services.
- If you are a volunteer, in some instances we may request additional information such as your resume and background checks.
- Password or other login credentials (selected by you) to create and access your accounts on the Websites or App.
- Golf score posting information, including your scores, courses you play, date and game statistics, golf experience, and information related to your handicap. For more information, see [FAQ: World Handicap System \(WHS\) and Your Information](#).
- Credit card information, which is collected and processed by a third-party payment processor, if you make a purchase or donation through the Websites or App. We do not explicitly collect your credit card information, and your payment information is never stored.
- Information we need to produce tax receipts for donors.
- Precise geolocation information, with your explicit consent, so that we can provide you with 'on-the-spot' promotional offers and upgrades.
- Health information if you submit a request to use motorized transportation at a Championship.
- Financial information if you are applying for a subsidy for one of our programs.
- Information you provide to us when you fill out a research survey, which you agree to participate in.
- Information you submit when you contact us or post on our Websites or App.

We may require additional Personal Information depending on the Services you request, the type of transaction you conduct, and the various activities in which you participate.

Information we automatically collect:

Like most websites and applications, we may collect information about your visit, use and interaction with our Websites or App. We collect this information through the use of cookies, pixel tags, beacons and similar technologies. Although most of the information we collect is anonymized and aggregated usage data, such as how many individuals visited our Websites, peak hours of visits, and which page(s) were viewed, we may also collect the following:

- Your Internet Protocol (IP) address, operating system, and browser type.
- Usage information that may be associated with your IP address such as your preferred settings (including language settings), your "clickstream" data including the pages, content or ads you view or click on during your visit, how long you view a page, time stamps of your visit, and search terms you enter.
- Geolocation information such as the country or province you are in when you view our Websites or use our App.
- Please refer to [Cookies and Other Technologies](#) to learn more about what information we collect through the use of cookies and how you can exercise your choices.

Information we collect from third parties:

We may also receive information about you from third parties. For example, your golf club or provincial golf association may provide us with your information so that you can be a member of Golf Canada and enjoy the services we have to offer. We may also collect your personal information from our partners, such as Ticketmaster when you purchase a ticket for a tournament or otherwise interact with them about our events or Services.

How Do We Use Your Personal Information?

We may use your Personal Information for the following purposes:

- **Provide you with our services:** For example, we may use your Personal Information to process and evaluate your membership application or application to participate in a tournament. We may also use your Personal Information to process transactions, such as payment for your membership or when you purchase a ticket for a tournament. Your personal information may also be used to determine your eligibility for subsidies.
- **Manage our programs:** To manage tournaments, championships, and fundraising.
- **Track your playing statistics:** To track your playing statistics and scoring record in the determination of your official Handicap Index in accordance with the World Handicap System and maintain the integrity of the handicap system. For more information, please see the [FAQ: World Handicap System \(WHS\) and Your Information](#).
- **Communicate with you:** To communicate with you or update you about your account, contests or your member benefits, our relationship, this Policy, or our Terms of Use. We may also send you newsletters, tailored advertisements, and push notifications, such as updates and notices about Golf Canada (or select third parties) products, services, events and benefits we think you would be interested in based on your history with us. Please see [Your Rights Related to Personal Information](#) for more information about how to opt-out of receiving promotional communications from us.
- **Respond to you:** To respond to your inquiries and requests.
- **Process a donation:** To process donations and payments, issue tax receipts, acknowledge donations, confirm renewal of ongoing donations, to keep you informed and to maintain a donation and benefit history.
- **Improve our services:** To measure and understand the effectiveness of content on our Websites and App and understand your needs and interests so that we can personalize your experience. Aggregated usage data also allows us to provide you with better Services and improve our Websites and App. We may de-identify and/or aggregate your Personal Information in such a way that it cannot be used alone or in combination with other information to identify you. We may use this information for research purposes, or to learn about how we can improve the quality of our Services.
- **Security and safety purposes:** To keep our Websites, App, programs, members, employees, partners, volunteers, donors, and users, safe and secure.
- **Pursuant to applicable law:** To comply with our legal or regulatory obligations as well as to investigate suspected fraud, harassment, or other violations of any law, rule, or regulation, enforce the rules or policies of our Websites/App, or to investigate any suspected conduct which Golf Canada deems improper.

We will only use your Personal Information for purposes described in this Privacy Policy or for purposes that we inform you of at the time of collecting your information. If we intend to use your Personal Information for a new purpose, we will ask you for your consent first, unless we are otherwise permitted by law or court order.

Personal Information We Share with Third Parties

There are certain circumstances in which we may disclose, transfer, or share your Personal Information with certain third parties. We limit who we share your Personal Information with and how much information we disclose.

We may share your Personal Information with the following third parties:

- **Partners:** Golf Canada shares Personal Information with third party partners that organize events, such as golf championships, or offer golf programs, such as First Tee, if you participate in those events or programs. Our partners use the information we share with them in accordance with their respective privacy policies, which may include sending you marketing communications. You should read their policies to become familiar with how they handle your information. One of our partners is PGA Tour, which co-hosts the RBC Canadian Open. If you are a participant or spectator at the tournament, your personal information, such as

your name and email address will be shared with PGA Tour in order for them to organize the event. PGA Tour may also send you marketing communications. You should read their privacy policy to become familiar with how they handle your personal information.

- **Service providers:** Golf Canada carefully selects service providers to assist us in providing you with Services such as managing our events, assisting us with ticket order fulfillment (e.g. Ticketmaster), helping us to operate and maintain our Websites and App, as well as marketing services. We also use payment processors to process payments securely on our behalf.
- **Score centre vendor:** To maintain the integrity of the World Handicap System, if you post a score in the Score Centre, we are required to share your Personal Information with GolfNet to calculate your Handicap, which helps us govern the sport. We may also share your Personal Information as it relates to your handicap score with relevant golf clubs, vendors, contractors, and suppliers if they are involved in calculating your handicap score.
- **Other Golf Canada members:** To facilitate peer review, individuals may have access to information about you that relates to your handicap score. For more information, please see [FAQ: World Handicap System \(WHS\) and Your Information](#).
- **Affiliates and associations:** To provide you with additional services and opportunities, we may share your Personal Information with our affiliates, such as provincial associations that you are also a member of through the joint-membership affiliation.
- **Acquirer or successor:** We may share your information with an acquirer or successor entity in the event we, or a substantial portion of our assets, undergo a business restructuring, transfer of ownership, or similar transaction.
- **As required or authorized by applicable law:** We may share your Personal Information in other circumstances if we are required or authorized to do so by applicable law. For example, we may share Personal Information with law enforcement, courts or government agencies with a court order. We may also share your information when we are investigating potential fraud.

We do not sell your Personal Information.

Our Use of Cookies and Other Technologies

When you visit our Websites or App, we may send your browser one or more cookies to improve the quality of our Services by storing user preferences and following user trends.

A cookie is a file containing an identifier (a string of letters and numbers) that is placed on your computer or mobile device when you visit a website or use a web-based application. The identifier relays information to us, such as what pages on our Website/App were visited. The term "cookie" is used in this Privacy Policy in the broad sense to include cookies and all similar technologies, including web beacons. Web beacons (sometimes called "tracking pixels") are tiny graphic files that contain a unique identifier that enable us to recognize when someone visited our Websites or App.

Cookies provide us with information, which is not identifiable to you, in order to understand how users enter and navigate our Websites/App. They are also used to remember user preferences. This helps us better understand how we can develop and improve the design, layout, content and function of our Websites/App. Some cookies may be placed on our Websites/App by third parties to provide you with relevant advertising.

Types of cookies we may use. We may use the following types of cookies on our Websites/App:

- **Strictly Necessary Cookies.** These essential cookies are necessary to provide you with our services and grant you access to our Websites/App. These cookies cannot be disabled.
- **Functional Cookies.** These cookies allow us to remember your choices on our Websites/App and provide you with enhanced features and personalized content. For example, these cookies can be used to

remember your log-in credentials or preferences on our Websites/App. While functional cookies can be disabled, this may result in less functionality while using our Websites/App.

- Performance or Analytics Cookies. These cookies collect anonymous, passive information about how you use our Websites/App, including web pages you visit and links you click. We use the information collected by such cookies to improve and optimize our Websites/App.
- Advertising cookies. These cookies are placed on our Websites/App by third parties. Third-party cookies may help us provide you with relevant advertising. The third-party advertisers may collect and use information about you and your visits to the Websites in order to provide advertisements about goods and services of interest to you. We are not responsible for the privacy practices of such companies. We encourage you to read these businesses' privacy policies to learn about how they treat your information.
- Our Websites/App uses Google Analytics to allow us to analyze and enhance user experience and better understand how you interact with our Services. Your de-identified information is transmitted to Google, which provides us with aggregated statistical reports. For more information on how Google Analytics collects and processes information, please visit Google's site "How Google uses data when you use our partners' sites or apps" located at www.google.com/policies/privacy/partners/. To opt-out of Google advertisements controlled by Google Analytics cookies, visit the Google Ads Preferences Manager located at <https://google.com/ads/preferences>.

How to manage cookies:

Most browsers are set up to accept cookies, however, you can reset your browser to reject cookies. You will need to follow the instructions contained in your browser's help file (usually located within the "Help," "Tools," or "Edit" settings). If you choose to disable cookies, some of the functionalities on our Websites/App and other sites may be affected. Be aware that clearing your browser history will clear all of the cookies for all the sites you have visited, even those you have opted-in to. You may also lose saved login information and preferences for other websites.

How We Protect Your Personal Information?

We understand the importance of protecting your Personal Information and are committed to taking all reasonable steps to secure and protect your information from unauthorized access, use, loss, modification and disclosure.

We protect Personal Information using a range of measures, consistent with industry practices, including:

- Physical measures, such as locked filing cabinets and restricted access to offices and facilities.
- Organizational measures, such as employee security clearances (including a formal Volunteer and Staff Screening Policy and Code of Ethics) and restricted "need-to-know" access.
- Technological measures, such as the use of passwords and intrusion detection software.
- Any service providers performing services on our behalf must provide the same level of security safeguards as Golf Canada itself provides.
- Using appropriate security measures when destroying Personal Information such as shredding of paper documents and deletion or anonymization of electronically stored information.
- Continually reviewing and updating our security policies and controls as technology changes to ensure ongoing security.
- While we take precautions to protect your Personal Information, it is important to note that no computer system or online communication is perfectly secure. As such, we cannot guarantee that information transmitted via our Services or stored on our servers will be free from unauthorized access. We encourage you to take appropriate steps to protect your information, including using a unique password and not sharing your password with anyone.

Your Rights Related to Personal Information

Correction:

We rely on you to provide us with accurate, complete and up-to-date information. If you need to update your Personal Information, you may do so directly in the App through your account or you may email us at privacy@golfcanada.ca (also see Contact Us). If you cannot update your information and you believe your Personal Information is inaccurate or incomplete, you may request, in writing, that we correct your record. You must be able to demonstrate the inaccuracy or incompleteness of the record and provide us with the information necessary to correct it.

Access:

You may also access your Personal Information by logging into your account via the App. If the information you are looking for is not in the App, you may send us a written request for a copy of your Personal Information.

We will respond to your request for access or correction within reasonable timelines, in accordance with applicable laws.

When we receive a written request for access, correction or withdrawal of consent, we will take reasonable steps to verify your identity before granting you access or correcting your Personal Information. There may be limited exceptions in which your request may be denied, such as if we cannot verify your identity or in accordance with applicable law, in which case we will advise you of our reasoning for declining your request.

For access or correction to your Personal Information related to your handicap score, please review the [FAQ: World Handicap System \(WHS\) and Your Information](#).

Choices:

You can opt-out of receiving promotional emails from us. To do so, you can unsubscribe to our communications at any time by following the instructions in the communication or emailing us at privacy@golfcanada.ca with your request. Once we receive your request, we will remove you from our mailing list. Please note that you cannot unsubscribe from some emails such as those related to the provision of our Services, which you are registered for.

If you wish to stop receiving push notifications through the App or Score Centre, you may change the settings through the Account Settings of the Score Centre member area or your app.

You may deactivate your user account by contacting members@golfcanada.ca. We will remove your profile but may retain any record of your information that is necessary to comply with applicable laws or in accordance with the World Handicap System protocol.

Retention of personal information:

We keep Personal Information for as long as is reasonably necessary to fulfill the purpose for which it was collected. We may also retain Personal Information if we have a legitimate business need to do so, or as required by law (e.g. for tax, legal, accounting or other purposes), whichever is the longer. Please see the [FAQ: World Handicap System \(WHS\) and Your Information](#) for information about how long your handicap score is retained.

Children:

We believe that the game of golf teaches children self-confidence, resilience and inner strength. Although we have members who are minors, we do not knowingly collect information from children under the age of 13 without the consent of their parents or legal guardian. If you are a parent or legal guardian who believes that we have inadvertently stored or collected Personal Information about your child without proper consent, please contact us and we will delete the information to the extent required by applicable law.

Children under the age of 13 should not provide their Personal Information to us through our Websites or App except under the supervision and with the permission of their parent or legal guardian.

If your child is a participant in our First Tee Program, we encourage you to read the [First Tee Privacy Program](#) to understand how we collect, use, and disclose your child's Personal Information.

International transfers of personal information:

Although our Services are based in Canada, your Personal Information may be transferred to a jurisdiction outside of Canada, such as the United States. Privacy laws in different jurisdictions have varying levels of protection for your Personal Information, and such laws may not be as protective or comprehensive as those that exist in your home jurisdiction.

Contact Us

We welcome your questions and comments about privacy. Please feel free to contact us by emailing our Privacy Officer at privacy@golfcanada.ca, calling us at (905) 849-9700 extension 226, or writing us at:

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