

## **Privacy Disclosure Statement**

This Policy/Statement is provided to you by ClubLink US Corporation in compliance with the Gramm-Leach-Bliley Act.

ClubLink US Corporation (ClubLink) considers the protection of your privacy as a cornerstone to our ongoing commitment of providing you with outstanding service. We take this responsibility very seriously. Outlined in the following pages is our policy as it relates to protecting the privacy of your personal information.

We invite you to take the time to review the following information carefully. As our business changes from time to time, we will continue to apply these basic principles thereby ensuring that your privacy is protected regardless of the business circumstances at ClubLink.

### **What is 'Personal Information'?**

Personal information, as used in this policy, means information about an identifiable individual, but does not include an individual's business title or business contact information. Some of the personal information that ClubLink may collect in the course of our business includes demographic information, financial information such as credit card information and personal address information.

Personal information as noted above is typically collected through Membership application forms and various documents that Members and guests provide to us from time to time in order to update the information on file. In some cases this includes information that Members provide through the Member's Only web site.

What ClubLink's Policy on the Protection of Personal Information Means for You  
It means that ClubLink;

Will not sell your personal information to third parties;  
Will keep all personal information that you provide to us secure from inadvertent disclosure;  
Will only gather and keep the information necessary to provide you with the proper services; and  
Will provide you with the opportunity to review any personal information we have on file about you and make changes if errors are discovered.  
ClubLink is dedicated to providing you with outstanding service and this includes providing you with the peace of mind associated with knowing that your personal information is protected.

### **Collection of Personal Information**

In order to provide you with the level of service that meets your expectations, from time to time we may require you to provide us with personal information. However, before we collect any personal information from you, we will identify the purpose for which we need to collect and use this information.

Some of the reasons for which we may need personal information include:

To process your Membership application;  
To book your event or banquet; or  
To update your Membership file.

Once we have collected the information that we need, we will only use that information for the identified purpose. If we were going to use this information for any other purpose, we will check

with you first to get your consent.

ClubLink will limit its collection of your personal information to that which it needs to properly service your account or to provide you with the services you request. Where other information is requested, we will only use this information for the purpose identified at the time we collect it, for internal statistical purposes or for external purposes only when the data collected is aggregated so as not to make any of your personal information identifiable.

## **Consent**

Before we collect any personal, private information from you, we will get your consent. Consent can be either express or implied.

In matters relating to particularly sensitive information such as financial information, we would require you to provide us with express consent. Express consent can be given either in writing or orally. For example, when you apply for a Membership and provide us with your credit card information, we require your signature as your consent to allow us to use your credit card information for payment purposes.

In other matters, your consent may be implied. For instance, if you make a purchase at one of our golf shops and present your credit card for payment purposes, your consent to our using your credit card number will be implied and no further consent will be sought.

## **Disclosure and Information Retention**

ClubLink will never sell or otherwise disclose your personal information to any outside agency or organization for commercial purposes without your consent. On occasion, certain organizations may present an opportunity for our Membership that we will determine to be of interest to you and we will pass this information on to you. However, we will never pass on your personal information without first getting your consent.

Because of the possibility for the inadvertent disclosure of your personal information to those not authorized to receive it, we will limit disclosure of information pertaining to your account, your Membership status and any other information we have on file, to you. Unless you identify an individual that may make inquiries on your behalf, we will not disclose any information about you or your account with ClubLink to anyone except you or anyone named by you.

There may be certain situations where ClubLink may disclose your personal information without your consent. These situations may include the following:

Where we believe that we are required to by law;

Internally where we are required to fulfill a contract or to provide you with the services you have contracted for;

Where we feel we need to, to protect our rights or the property of ClubLink; or

Where we have first acquired your consent.

ClubLink may use your personal information on an aggregated basis for disclosure to third parties, for example to provide a third party with a demographic statistic such as '25% of our Members are between the ages of 35 - 45'. However, be assured that you will never be personally identified.

ClubLink, like many organizations, is subject to certain legislative requirements regarding the

retention of certain records for a period of time. As long as you are an active Member or client of ClubLink, we will maintain a file containing the information necessary to service your needs. We will update your file as you provide us with new information. Should you ever cease to be a Member or a customer of ClubLink, your personal information will be kept only for a reasonable period of time thereafter. When your information is no longer needed it is destroyed or it is made anonymous.

### **How we Safeguard your Personal Information**

All personal information we have on file is held in a secure location, whether locked in cabinets or password protected on our network. No one without proper authorization has access to your information.

As it relates to ClubLink's web site, our use of industry-standard firewalls are a combination of hardware and software that separately secures the Internet from our organization's web servers and our web servers from our data. They are designed to prevent unauthorized access to our web servers or our data. Secure Socket Layer (SSL) Encryption is used whenever financial information, customer identification, personal information and passwords are transmitted to our servers over the Internet.

### **Accuracy, Openness and Individual Access**

ClubLink will maintain as accurate a file as possible and will update your personal information as you provide it to us. At any time, you may make a request to see the information that we have on file about you. If you believe that we have inaccurate information on file, you may request that we update our records. Likewise, you may request that we destroy any outdated information.

The examples listed in this Policy are illustrations, and are not all-inclusive. This Policy does not apply to Personal Information relating to partnerships, trusts or corporations.