

Operational Policy		GDPR & WEBSITE PRIVACY POLICY	
Lead Functional Area		EXECUTIVE DIRECTORS OFFICE	
Policy Number	ED23	Last update	28 July 2022
<p>POLICY OBJECTIVE</p> <p>The International Golf Federation (IGF) is fully committed to protecting everyone’s right to privacy. IGF officials in collecting information will comply with all aspects of the Swiss Federal Act on Data Protection (FADP) and the Ordinance to the Federal Act on Data Protection</p> <p>It is the IGF’s responsibility to ensure that relevant staff and officials are familiar with their obligations under the Acts and that the handling of both personal and health information is done so in accordance with the law.</p>			
<p>POLICY DESCRIPTION</p> <p>Your privacy is very important to us and we believe that you should always keep the control over your personal information. This Privacy Policy, as updated from time to time, explains what information about you is collected and how it is processed when you use digital services such as websites, newsletters, registration systems, or online resources offered on the www.igfgolf.org website and other digital properties operated by the International Golf Federation (the “IGF”) (collectively the “Services”).</p> <p>When you use the Services, information about you will be collected and processed in accordance with this Privacy Policy by the IGF. When we refer to “we”, “our” or “us”, we are referring to the IGF. When we refer to “you” or “your” we refer to you as a user of the Services</p> <p>Specific rules and additional terms may apply due to the nature and purpose of certain of our Services. This is for instance the case of certain systems for event registration or reporting mechanisms managed by the IGF. In such cases, these specific terms will be brought to your attention before you use the relevant Services and will prevail over the terms of this Privacy Policy in case of any inconsistency.</p> <p>Please read the IGF Website Terms and Conditions of Use and this Privacy Policy carefully. By accessing or using the Site, you agree to be bound by the terms and conditions described herein and by all terms, policies and guidelines incorporated by reference. If you do not accept all these conditions, please do not use the Site.</p>			
<p>WHAT INFORMATION DO WE COLLECT?</p> <p>1. Information that you provide to us</p> <p>You may provide us with information, including personally identifiable information, such as email address, last name, first name, country of residence, date of birth, gender, password, address, etc, when you register on the Services, create a user account, communicate with us, complete certain transactions or subscribe to Services such as event registration, professional online resources, or media alerts.</p> <p>a) Account data</p> <p>If you create a user account, we may ask you to provide us with your first name, last name, email address, age information, login information, and password. To access certain business resources, we may ask you to provide additional information such as your business organisation, job title, physical address, phone number and nationality.</p> <p>b) Data necessary to provide certain Services</p> <p>Certain Services may allow you to apply for registration or accreditation to the Olympic Games, Youth Olympic Games, World Amateur Team Championships, or other events organised by the IGF, or book travel and accommodation related to these events. Other Services may give you access to specific business resources made available by the IGF to other Olympic</p>			

Movement stakeholders. In such cases, we will inform you of any additional information needed to provide to you the Services that you have requested and of the other conditions applicable to the processing of your personal information for the provisions of such Services.

c) Communications data

If you communicate with us and/or request any Service from us, we will use your account information and any other information you may provide us to answer your queries.

2. Information that is collected automatically when you use the Services:

- Device attributes, including operating system, hardware and software versions, browser type, language
- Unique device identifier (UID)
- Network connections (information such as your Internet Service Provider, language, time zone, IP address)
- General location (country, city).

Our website and digital properties use cookies to distinguish you as a user, either for the duration of your visit (“session cookie”) or when you return (“persistent cookie”). Cookies are small files stored on your browser or the hard drive of your computer that are used to gather information regarding interactions with our website and other digital properties such as browser type, operating systems, IP address, device type, location, date and time of access. These cookies are placed on your device by us (“first party cookies”) or by third parties providing certain services to us such as analytics and advertising (“third party cookies”).

We use different types of cookies, including:

- Strictly necessary cookies that enable you to navigate on our website and other digital properties or provide certain basic features such as storing usernames and passwords so that you don’t have to log in at each session;
- Functionality cookies that enhance the functionality of our website and other digital properties by storing your preferences;
- Performance cookies that improve the performance of our website and other digital properties and provide you with a better user experience; and
- Behavioural advertising cookies that tailor advertising served to you on our website and other digital properties based on your browsing activity and the location from which you access our website and other digital properties.

We use first party cookies to enable users to remain signed in.

These are examples of third party cookies we use:

- Google Analytics, to be able to measure traffic and performance of the service;
- Google (Double Click for Publishers), to be able to provide advertising of products or services that reflect your use of the service;
- Add this social sharing widget, to enable you to share content with a range of networking and sharing platforms and for us to be able to see how often content has been shared;

– Facebook – to be able to provide advertising of products or services that reflect your use of the service;

By using the Services, you accept the use of these cookies. You may turn off cookies or change your preferences by changing your browser settings. More information is available here:

– Internet Explorer users: <http://windows.microsoft.com/en-GB/internet-explorer/delete-manage-cookies>

– Mozilla Firefox users: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> and <https://support.mozilla.org/en-US/kb/delete-cookies-remove-info-websites-stored>

– Google Chrome users: <https://support.google.com/chrome/answer/95647?hl=en>

– Safari users: <http://help.apple.com/safari/mac/8.0/#/sfri11471>

3. Information that you have made publicly available

The Services are provided for information and entertainment purposes and the content offered on our website and digital properties may include publicly available information about IGF members, athletes and other persons who are newsworthy and whose stories contribute to the mission of the IGF.

HOW DO WE USE THE INFORMATION WE COLLECT?

We use the information we collect about you and your use of the Services to:

- a) facilitate your use of the Services, enable your registration and authentication, and manage your user account;
- b) maintain and develop the Services;
- c) gather statistics to help diagnose problems, enhance your experience of the Services and improve the quality of the Services;
- d) ensure the security of the Services and that the Services are used in compliance with the Terms of Service of the igfgolf.org website and any additional terms applicable to our different Services (together, the “Terms of Service”) and applicable laws;
- e) offer you a personalized experience of the Services, for instance by suggesting to you content based on preferences you have indicated and previous choice of content, and deliver relevant advertising to you;
- f) provide to you Services, information and content that you have requested;
- g) communicate with you, including by answering your requests, sending you communications related to your user account and our Terms of Service and, if you have opted-in to this service or qualify for it according to the law, send you marketing communications (including by email and other electronic channels) about the Services, our activities and the activities of the Olympic Movement and its partners, while offering you the possibility to opt-out from such marketing communications at any time; and
- h) show and measure advertisements, on the Services and, on third party services like Google, Facebook, You Tube and Twitter. If you own an account both on the Service and on these third-party services, we may, by sharing information with these companies, identify you as user of these third-party services and serve you our advertisements on such services.

Uses contained in paragraphs (a) to (h) above reflect processing grounds necessary for the performance of our contractual relationship with you. Uses contained in paragraphs (g) and (h) reflect processing grounds necessary for the purposes of the

legitimate interests pursued by the controllers or by certain third parties, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child. Paragraphs (a) and (g) may also reflect processing grounds necessary for compliance with a legal obligation to which the controller is subject. See below the section on Legal Basis for Processing to find additional information, in particular regarding consent.

WHO DO WE SHARE YOUR INFORMATION WITH?

1. Information you decide to make public

Through functionalities of the Services, we may allow you to make certain information available to other users of the Services. You decide what information you want to make public.

2. The IGF and our membership

We are also assisted by our membership who provide services to the IGF and help us deliver the Services to you. We sometimes share your personal information among us and with our affiliates, where necessary for the purposes and legal basis for processing highlighted in this Privacy Policy.

3. Our vendors and service providers

We rely on a network of professional vendors and service providers who are working on our behalf and help us operate, develop, secure, promote and measure the Services and our advertisements. Services provided by these partners include:

- a) infrastructure and general IT services
- b) platform development services
- c) cloud-based services for customer identity and access management
- d) hosting services
- e) customer relationship management and other communication services
- f) analytics and measurement services
- g) email communications and push notification services
- h) third party web and social media services on which we serve our advertisements.
- i) services to manage user access requests, cookie consents.

We may share information you provide through the Services with these companies where necessary for them to provide to us their services and for the purposes and legal basis for processing highlighted in this Privacy Policy. These service providers are bound to strict confidentiality obligations under our agreements, ensuring the respect of this Privacy Policy. The service providers will retain and use such personal data as long as they are working for us and until you decide to delete your account or unsubscribe from our service.

4. Events-related services and other services

If you use the Services to request certain services from us, for instance to apply for registration or accreditation to attend the Olympic Games, Youth Olympic Games, the World Amateur Team Championships or other events organised by the IGF, or for booking travel and accommodation in relation to these events, the provision of the services requested by you may require us

to share your personal information with third parties (e.g. travel or accommodation providers, organising committees, or governmental agencies). Other services that you may request from us may also require that we share your information with third parties assisting us in the delivery of such services, such as IGF members, Olympic Movement entities (such as International Olympic Committee, international federations, national Olympic committees or organising committees), academic institutions, or other delivery partners. We will specify in the relevant Terms of Service the categories of third parties with whom your personal information may have to be shared and other conditions applicable to such sharing of information in relation to the Services requested.

5. Offers from our partners

From time to time, we may offer you the possibility to receive communications (including communications related to products and services) from selected third parties, such as IGF members, our commercial partners and members of the Olympic Movement. In case you opt-in or can lawfully receive such communications, we may share your information with the relevant third parties, while giving you the possibility to opt-out at any time.

6. Legal disclosure

We reserve the right to disclose personal information we hold about you if we are required to do so under applicable laws or pursuant to any judicial or administrative process, and to the extent necessary to investigate, prevent, or take action regarding unlawful activities, or violation of our Terms of Service under the legal basis described in this Privacy Policy.

HOW DO WE PROTECT YOUR PERSONAL INFORMATION?

1. Data security

We use technical and organisational measures to protect your personal information against the risks of damage, destruction, loss or unauthorised access, in accordance with applicable laws.

2. International transfer

While the information we collect will usually be processed in the European Union or in Switzerland, we may also transfer your information for the purposes and legal basis for processing highlighted in this Privacy Policy to the above-mentioned recipients (see above “WHO DO WE SHARE YOUR INFORMATION WITH?”), some of which may be based in countries that, like the United States of America, do not provide in their laws for a level of protection of your privacy equivalent to the one applied within the European Union and Switzerland. This will happen when some of the companies helping us operate the Services (see above “Our service providers”) access your information from countries located outside Europe. Before transferring data from Switzerland or the European Union to the United States and other countries, we implement safeguard mechanisms recognized by Swiss and European regulators such as standard contractual clauses, or seek your express consent.

3. Age limitation

The Services are intended for users who are 13 years old (or older) and we will not knowingly collect personal information about users below that age. If you are aged 13 to 15 years old, you can only use the Services with the prior authorisation from a parent or guardian.

If we become aware that a child has provided us with personal information without parental or guardian consent, we will take steps to delete this information and close the child's account. If you become aware that your child has provided us with personal information without your consent, please contact us at privacy@igfmail.org.

4. Data retention

We will retain your information only for the duration necessary for the purposes identified in this Privacy Policy or as required to meet our legal requirements.

LEGAL BASIS FOR PROCESSING YOUR DATA AND YOUR RIGHTS

We mainly process your information to perform our obligations under our Terms of Service but in certain cases, we also rely on other justifications.

1. Contractual necessity

Contractual necessity applies for all users who are of age to enter into a contract by accepting our Terms of Service and justifies the following uses of user personal information:

- a) Providing the Services and personalizing your experience of the Services by customizing certain features based on your interests
- b) Managing registration and user account
- c) Securing and developing the Services
- d) Communicating with you in relation to the Services
- e) Sharing data with our partners who may offer you their services
- f) Transferring, storing or process your data outside Switzerland or the European Union, including within the United States and other countries
- g) Providing you services or information which you have requested

In these cases, you have the right to port your data.

2. Consent

We may also process certain data based on your explicit consent, which you can withdraw at any time, for the following activities:

- a) Send you certain marketing communications

In these cases, you have the right to port your data and to withdraw your consent.

3. Legitimate interests

We also rely on our legitimate interests, especially for our users who may not be of age to enter into a contract, to provide a secure and efficient Services that are consistent with our Terms of Service so that our visitors, partners and fans may receive

high quality Services and may enjoy golf and Olympic-related content corresponding to their interests. Legitimate interests constitute a basis for the following activities:

- a) Making available through the Services publicly available information related to golf, the World Amateur Team Championships, Olympic Games, Youth Olympic Games, Olympians and other athletes, sports and news stories
- b) Providing the Services and personalizing your experience of the Services by customizing certain features based on your interests
- c) Managing registration and user accounts
- d) Securing and developing the Services
- e) Communicating with you in relation to the Services
- f) Transferring, storing or processing your data outside Switzerland or the European Union, including to or within the United States and other countries
- g) Sending you marketing communications, including via emails, if you have opted-in or can lawfully receive such communications
- h) Sharing data with our partners who may offer you their services
- i) Sharing your information with third parties including law enforcement authorities where we suspect an unlawful activity.

In these cases, you have the right to object to the processing of your information or ask us to restrict such processing.

4. Compliance with our legal obligations

We may also invoke our legal obligations as a valid ground for sharing your information with judiciary or law enforcement authorities, if we are ever obliged to do so.

In such case, you have the right to object to the processing of your information or ask us to restrict such processing.

HOW TO EXERCISE YOUR RIGHTS

You have the following rights under the DPA and GDPR, which this Privacy Policy and Our use of Your information have been designed to uphold:

- a) the right to be informed about Our collection and use of information;
- b) the right of access to the information We hold about You;
- c) the right to rectification if any information We hold about You is inaccurate or incomplete;
- d) the right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about You (We only hold Your personal data for a limited time, but if You would like Us to delete it sooner, please contact Us);
- e) the right to restrict (i.e. prevent) the processing of Your information;
- f) the right to data portability (obtaining a copy of Your information to re-use with another service or organisation);
- g) the right to object to Us using Your information for particular purposes; and
- h) rights with respect to automated decision-making and profiling.

If You have any cause for complaint about Our use of Your information, please contact Us using the contact form at privacy@igfmail.org. We may require You to provide verification of Your identity. If We are unable to help, You also have the right to lodge a complaint with the Swiss Federal Data Protection and Information Commissioner (“FDPIC”) or the competent Information Commissioner in the EU (where applicable). Please note that in certain circumstances We may withhold access to Your information where We have the right to do so under current data protection legislation.

Contact us

To object to the processing of your information or the information of your child, or request a restriction of such processing, to withdraw your consent or to request access, deletion or correction of any erroneous or incomplete data, to exercise your data portability right or for any question related to this Privacy Policy, you can contact us at the following address:
privacy@igfmail.org.

Data Protection Officer

You can contact our privacy officer at the following address

Data Protection Officer
 International Golf Federation
 Avenue de Rhodanie, 54
 1007 Lausanne
 Switzerland
privacy@igfmail.org

Withdrawal of Consent

In the event consent was given, you have the right to withdraw such consent given at any time by sending a written notice
privacy@igfmail.org.

CHANGES TO THIS PRIVACY POLICY

When we make changes to this Privacy Policy, we will do our best to inform you in advance of such change, for example by posting a notice on the Services, so you can review our revised policy and decide whether to continue to use the Services or not. Your continued use of the Services after the entry into force of the revised Privacy Policy will constitute your confirmation of your reading and understanding of such changes. We encourage you to review our Privacy Policy regularly.

Other Functions impacted by policy	ALL
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POLICY APPROVED

Date: 8 April 2015

REFERENCE:

NIL