

## **Mobile App Privacy Policy**

**Last modified: 4/16/2024**

### **Introduction:**

Bent Creek Country Club (“Company” or “We”) respects your privacy and is committed to protecting it through our compliance with this Privacy Policy. This Policy describes how Bent Creek collects, uses, and shares your personal data. This Policy describes (i) the types of information we may collect or that you may provide when you download, access, or use the Bent Creek Country Club (the “App”) and (ii) our practices for collecting, using, maintaining, protecting, and disclosing that information. This Policy applies only to information we collect in this App and email, text, and other electronic communications sent through or in connection with this App.

This Policy **DOES NOT** apply to information that:

- We collect offline or on any other Company apps or websites, including websites you may access through this App.
- You provide to or is collected by any third party (see Third-Party Information Collection).

Please read this Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you disagree with our policies and practices, do not download, register with, or use this App. By downloading, registering with, or using this App, you agree to this privacy policy. This Policy may change occasionally (see Changes to Our Privacy Policy). Your continued use of this App after we revise this Policy means you accept those changes, so please check the Policy periodically for updates.

### **Information We Collect and How We Collect It**

We collect information from and about users of our App:

- Directly from you when you provide it to us
- Automatically when you use the App.

### **Information You Provide to Us**

When you download, register with, or use this App, we may ask you to provide (i) information by which you may be personally identified, such as name, postal address, email address, or telephone number (“PII”) and (ii) information that is about you but does not identify you individually, such as membership number.

This information includes:

- Information that you provide by filling in forms in the App, including information provided at the time of registering to use the App and making reservations with the restaurant, signing up tee-times, reserving court time, signing up for club events, and

requesting further services. We may also ask you for information when you report a problem with the App.

- If you contact us, records and copies of your correspondence (including email addresses and phone numbers).
- Your responses to surveys that we might ask you to complete for research purposes.
- Details of transactions you carry out through the App and the fulfillment of your orders. You may be required to provide financial information before placing an order through the App.
- Your search queries on the App.

You may also provide information for publication or display (“Posted”) on public areas of the App or websites you access through the App (collectively, “User Contributions”). Your User Contributions are Posted and transmitted to others at your own risk. Please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of third parties with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that unauthorized persons will not view your User Contributions.

#### Information We Collect Through Automatic Data Collection Technologies

When you download, access, and use the App, it may use technology to collect automatically:

- Usage Details. When you access and use the App, we may automatically collect certain details of your access to and use, including traffic data, location data, logs, and other communication data, as well as the resources you access and use on or through the App.
- Device Information. We may collect information about your mobile device and internet connection, including the device’s unique device identifier, IP address, operating system, browser type, mobile network information, and telephone number.
- Stored Information and Files. The App also may access metadata and other information associated with other files stored on your device. This may include, for example, photographs, audio and video clips, personal contacts, and address book information.
- Location Information. If you use a mobile device, your device may share location information (when you enable location services) with our websites, App, services, or service providers.
- Social Media Widgets. Our sites and App include social media features like Facebook, Pinterest, and Twitter widgets. These features may collect information about you, such as your IP address and which page you are visiting on our website. They may set a cookie or employ other tracking technologies to accomplish this. A third party may host social media features and widgets. Your interactions with those features are governed by the privacy policies of the companies that provide them.

If you do not want us to collect this information, do not download or delete the App from your device. For more information, see [Your Choices About Our Collection, Use, and Disclosure of Your Information](#). If you opt out of the App’s collection of location information, it will disable the Apps location-based features.

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We also may use these technologies to collect information about your activities over time and across third-party websites, apps, or other online services (behavioral tracking). [Click here \[URL LINK TO DO NOT TRACK DISCLOSURES\]](#) for information on how you can opt out of behavioral tracking on or through this App and how we respond to browser signals and other mechanisms that enable consumers to exercise choice about behavioral tracking.

The technologies we use for automatic information collection may include:

- Cookies (or mobile cookies). A cookie is a small file placed on your smartphone. It may be possible to refuse to accept mobile cookies by activating the appropriate setting on your smartphone. However, if you select this setting, you may be unable to access certain parts of our App.
- Web Beacons. Pages of the App and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related app statistics (for example, recording the popularity of certain app content and verifying system and server integrity).

#### Third-Party Information Collection

When you use the App or its content, certain third parties may use automatic information collection technologies to collect information about you or your device. These third parties may include:

- Advertisers, ad networks, and ad servers.
- Analytics companies.
- Your mobile device manufacturer.
- Your mobile service provider.

These third parties may use tracking technologies to collect information about you when you use this App. The information they collect may be associated with your PII, or they may collect information, including PII, about your online activities over time and across different websites, apps, and other online services websites. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. You should contact the responsible provider directly if you have any questions about an advertisement or other targeted content. For information about how you can opt out of receiving targeted advertising from many providers, see [Your Choices About Our Collection, Use, and Disclosure of Your Information](#).

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#### How We Use Your Information

We use the information we collect for a variety of purposes, including activities such as resolving issues, improving our services, and processing transactions. In addition, the information We collect improves your experience by delivering more personalized interactions

and advertising on digital, social media, and other platforms. Our purposes include, but are not limited to, the following:

- Provide you with the App, its contents, and any other information, products, or services you request from us.
- Fulfill any other purpose for which you provide it.
- Give you notices about your account, including expiration and renewal notices.
- Carry out our obligations and enforce our rights arising from any contracts between you and us, including for billing and collection.
- Notify you when App updates are available and of changes to any products or services we offer or provide through it.
- Deliver coupons, mobile offers, newsletters, emails, mobile messages, target advertising, and social media notifications.
- Administer promotions, surveys, and focus groups.
- Improve Guest experiences.
- Personalize content, including using your image.
- Perform other business activities as needed or as described elsewhere in this Policy.

The usage information we collect helps us to improve our App and to deliver a better and more personalized experience by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our App according to your individual interests.
- Speed up your searches.
- Recognize you when you use the App.
- Respond to requests for information regarding our products and services or to otherwise serve you.
- Connect with you on social media or internet chat platforms.
- Conduct a transaction where we collect information required by law.
- Show you a map of our facility, add and redeem offers, search for products, check availability for services, update information, etc.

We may also use your information to contact you about goods and services that may interest you. If you do not want us to use your information this way, please check the relevant box on the form on which we collect your data (the registration form). For more information, see [Your Choices About Our Collection, Use, and Disclosure of Your Information](#).

We may use the information we collect to display advertisements to our advertisers' target audiences. Even though we do not disclose your PII for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

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We may also link your various devices so that the content you see on one device can result in a relevant experience on another device. This allows us to deliver more personalized and consistent advertising to you.

We may engage with you on social media platforms like Facebook, Twitter, Pinterest, and TikTok. If you contact us on one of our social media handles, request help via social media, or otherwise direct us to communicate with you via social media, we may contact you via direct message or use other social media tools to interact with you. In these instances, your interactions with us are governed by this privacy policy and the privacy policy of the social media platform you used. We may display targeted ads to you through social media platforms. These ads are sent to groups of people with similar traits, such as likely commercial interests, demographics, hobbies, etc.

#### Disclosure of Your Information

We may disclose aggregated information about our users without restriction. In addition, we may disclose the PII that we collect or you provide:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Bent Creek Country Club's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which PII held by Bent Creek Country Club about our App users is among the assets transferred.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.
- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce our rights arising from any contracts entered into between you and us, including the [\[Terms of Service \[LINK TO APP'S TERMS OF SERVICE\],\]](#) and for billing and collection.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Bent Creek Country Club, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

#### Your Choices About Our Collection, Use, and Disclosure of Your Information

We strive to provide you with choices regarding the PII you provide to us. This section describes mechanisms we provide for you to control certain uses and disclosures of your information.

- Tracking Technologies. You can set your browser to refuse all or some browser cookies or to alert you when cookies are being sent. [\[You can choose whether or not to allow the App to collect information through other tracking technologies by \[OPT-OUT METHOD\]\]](#). If you disable or refuse cookies or block other tracking technologies, some parts of the App may be inaccessible or not function properly.
- Location Information. You can choose whether or not to allow the App to collect and use real-time information about your device’s location through the device’s privacy settings. If you block the use of location information, some parts of the App may become inaccessible or not function properly.
- Promotion by Bent Creek. If you do not want us to use your contact information to promote our own products or services, [you can opt out by \[OPT-OUT METHOD\]](#). [You can also always opt out by logging into the App and adjusting your user preferences in your account profile by checking or unchecking the relevant boxes](#) or by sending us an email stating your request to [\[EMAIL ADDRESS\]](#).

We do not control third parties’ collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative (“NAI”) [on the NAI’s website](#).

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Analytics services such as Google Analytics and Site Catalyst by Adobe Analytics provide services that analyze information regarding visits to our mobile application or website. They collect this information through cookies, web beacons, recorded interactions, and other tracking mechanisms.

Residents in certain states like California may have additional PII rights and choices. Please see [Your State Privacy Rights](#) for more information.

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Accessing and Correcting Your Personal Information

You can review and change your PII by logging into the App and visiting your account profile page. You may also email us at [\[EMAIL ADDRESS\]](#) to request access to, correct, or delete any PII you provided. We cannot delete your PII except by also deleting your user account. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

If you delete your User Contributions from the App, copies of your User Contributions may remain viewable in cached and archived pages or have been copied or stored by other App users. Proper access and use of information provided on the App, including User Contributions, is governed by our terms of use [\[LINK TO TERMS OF USE\]](#).

Residents in certain states like California may have additional PII rights and choices. Please see [Your State Privacy Rights](#) for more information.

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### Children Under the Age of 13

The App is not intended for children under 13 years of age, and we do not knowingly collect personal information from children under 13. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please get in touch with us at [\[CONTACT INFORMATION\]](#).

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California residents under 16 years of age may have additional rights regarding the collection and sale of their personal information. Please see [Your State Privacy Rights](#) for more information.

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### Your State Privacy Rights

While We do not intentionally market our App or Website to residents in California, Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Montana, Oregon, Tennessee, Texas, Utah, and Virginia, such states provide (now or in the future) their state residents with rights to:

- Confirm whether we process their personal information.
- Access and delete certain personal information.
- Correct inaccuracies in their personal information, taking into account the information's nature processing purpose (excluding Iowa and Utah).
- Data portability.
- Opt-out of personal data processing for:
  - targeted advertising (excluding Iowa);
  - sales; or
  - profiling in furtherance of decisions that produce legal or similarly significant effects (excluding Iowa and Utah).
- Either limit (opt-out of) or require consent to process sensitive personal data.

The exact scope of these rights may vary by state. To exercise any of these rights, please [\[REQUEST SUBMISSION METHOD\]](#). You must submit information about yourself that Bent Creek will use to determine if We have any information about you. If we are able to locate information about you, we will fulfill your access, correction, and/or deletion request. If we are not able to verify your information, we may provide you with a report that includes the categories of personal information we collect, use, disclose, or share. If you are an authorized agent, you will be required to submit your contact information and the information about the person for whom you are making a request. As an authorized agent, you will receive an email confirming that we have received the request and a second email asking you to fill out a certification form confirming your information and certifying you have the right to make a request on behalf of the person in question.

Bent Creek will not discriminate against you because you exercise your rights. For example, We will not deny you goods or services or charge you a different price or rate for goods or services if you make access, deletion, or do not sell request. Bent Creek does not have actual knowledge that it sells or shares the personal information of Minors under the age of 16.

To appeal a decision regarding a consumer rights request [APPEAL PROCEDURE].

#### Access and Update your Personal Information

In order to keep your PII accurate and complete, you can access or update some of it in the following ways:

- Log in to review and update your account information, including contact, billing, and shipping information.
- Email [EMAIL ADDRESS] with your current contact information and the PII you would like to access. We will provide you with the PII requested if reasonably available or will describe the types of PII we typically request.

#### Data Security

We have implemented measures designed to secure your PII from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls. Any payment transactions will be encrypted using SSL technology.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our App, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, transmitting information via the Internet and mobile platforms is not completely secure. Although we do our best to protect your PII, we cannot guarantee the security of your PII transmitted through our App. Any transmission of PII is at your own risk. We are not responsible for circumvention of any privacy settings or security measures we provide.

#### Changes to Our Privacy Policy

We may update our privacy policy from time to time. If we make material changes to how we treat our users' PII, we will notify you through a notice on the Website home page. The date the privacy policy was last revised is at the top of the page. You are responsible for periodically visiting this privacy policy to check for changes.

#### Contact Information

To ask questions or comment about this privacy policy and our privacy practices, contact us at:

[ADDRESS/EMAIL ADDRESS]

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