



## Rewards4Golf Privacy Policy

**We protect your information; our business depends on it.**

### Who we are

This is the privacy statement of Rewards4Golf Limited.

### Our privacy promise

Rewards4Golf takes your privacy very seriously, and so should you. We respect your privacy and your rights to know how your personal information is being treated. The interests of our members and the data that we collect helps us provide you with the Rewards4Golf programme services and ensures that you have the best experience when interacting with, and using, the Rewards4Golf programme.

As the operator of the Rewards4Golf programme, we are committed to doing the right thing when it comes to how we collect, use and protect your personal information.

Looking after the personal information you share with us is a hugely important part of this. We want you to be confident that your data is safe and secure with us and understand how we use it to offer you a better, more personalised and more rewarding experience.

Please read through our Privacy Policy to see what we're doing with your personal information and how we're keeping it safe.

### Personal information we collect

We may collect, use and store different types of personal information about you, which we have grouped as follows:

Event	Personal information collected
<i>When you register for our services</i>	<ul style="list-style-type: none"><li>• Full name and email address, plus we will also automatically collect your IP address.</li><li>• Your account login details, such as the password that you have chosen and set on your account, so that you are able to gain access to the website and your account.</li><li>• Your age or address, or location data when using Rewards4Golf on your mobile device, where you agree to provide that information</li></ul>
<i>When you shop with us online or browse our Website, Mobile App or Points Reminder</i>	<ul style="list-style-type: none"><li>• Information about your purchases with our <a href="#">Programme Partners</a> (for example, what you bought, when you bought it, how much you paid).</li><li>• Information about your online browsing behaviour and information about when you click on one of our adverts (including those shown on other organisations' websites).</li><li>• Information about any devices you have used to access our services (including the make, model and operating system, IP address, browser type and mobile device identifiers)</li></ul>
<i>When you contact us or we contact you or you post user</i>	<ul style="list-style-type: none"><li>• Information that you provide about yourself any time you contact us about our services (for example, your name,</li></ul>

<p><i>generated content on our website or take part in promotions, competitions, surveys or questionnaires about our services</i></p>	<p>email address and contact details), including by phone, email or post or when you contact us through social media.</p> <ul style="list-style-type: none"> <li>• Details of the user generated posts or content that you upload and share on our website.</li> <li>• Details of the emails and other digital communications we send to you that you open, including any links in them that you click on.</li> </ul>
<p><i>When you collect points for transactional or engagement activity on any of our partner websites, Apps and through other marketing channels</i></p>	<ul style="list-style-type: none"> <li>• Information about your purchases with our <a href="#">Programme Partners</a> (for example, season tickets, matchday tickets or memberships that you have bought, when you bought them, how much you paid).</li> <li>• Information about your engagement activity with our <a href="#">Programme Partners</a> (for example, when you viewed a video, read an article, or engaged with our partners through other marketing channels).</li> <li>• Information about any devices you have used to gain points for engagement activity on any of our <a href="#">Programme Partners</a> websites, Apps and through other marketing channels (including the make, model and operating system, IP address, browser type and mobile device identifiers).</li> <li>• Rewards4Golf may also place cookies on your device to enable the tracking of your activity on any of our <a href="#">Programme Partners</a> websites, Apps and through other marketing channels.</li> </ul>

### What we use your data for and why we process it

The table below explains how we use your personal information and the reasons that we rely on in doing so. Where these reasons include legitimate interests, we explain what these legitimate interests are.

What we use your data for	Legal Basis for Processing	Legitimate Interests
<p>To provide Rewards4Golf programme services to you</p>	<p>Contractual performance and legitimate interests</p>	<p>To meet our contractual obligations to you</p> <p>To provide programme services to you</p> <p>To comply with laws and regulations that apply to us</p>
<p>To perform the promises that we make to you as a member of the Rewards4Golf programme, including the provisions in the <a href="#">Member Agreement</a></p>	<p>Contractual performance</p>	
<p>To perform contracts with third parties that are involved with the Rewards4Golf programme (as well as managing the risks and liabilities under those contracts)</p>	<p>Legitimate interests</p>	<p>To run our business efficiently using the services of others to support the programme</p> <p>To ensure that we benefit from the terms of the contracts we have properly entered into and properly</p>

What we use your data for	Legal Basis for Processing	Legitimate Interests
		<p>managed the risks and liabilities associated with them</p> <p>To enable us to provide the programme services to you</p>
<p>To keep you informed about the benefits of the Rewards4Golf programme, including:</p> <ul style="list-style-type: none"> <li>• Points earning opportunities with programme partners</li> <li>• Recommending offers and promotions that we think you'll like</li> <li>• Checking whether you are entitled to valuable Rewards4Golf points from our partners.</li> <li>• Letting you know about exciting competitions or promotions</li> <li>• Providing exciting news about the sport you love</li> </ul>	<p>Contractual performance</p> <p>Legitimate interests</p> <p>Soft opt-in rule for marketing to existing customers</p>	<p>To provide efficient member care and services</p> <p>To ensure you maximise the benefits from programme membership</p> <p>To assess which of our benefits interest you and to tell you about them</p> <p>To develop new products and services and improve existing ones</p> <p>To obtain your feedback</p>
<p>To manage your Rewards4Golf account and to identify and calculate any Rewards4Golf points entitlement you might have. For more information please see our <a href="#">Member Agreement</a></p>	<p>Contractual performance</p> <p>Legitimate interests</p>	<p>To operate the programme in a manner that allows us to allocate points for your benefit</p>
<p>To provide financial and account administration in relation to the Rewards4Golf programme, including the calculation of commissions and points earned and spent by members</p>	<p>Contractual performance</p>	
<p>To provide you with Rewards4Golf programme updates and information</p>	<p>Contractual performance</p>	
<p>To provide you with relevant content in relation to the Rewards4Golf programme and points earning opportunities our partners through relevant targeted advertising on third party websites, such as Facebook, Google and Twitter.</p>	<p>Legitimate interests</p>	<p>To ensure you maximise the benefits of programme membership</p> <p>To assess which of our benefits interest you and to tell you about them</p>
<p>To operate the Rewards4Golf programme so that we comply with our legal obligations and to ensure the proper</p>	<p>Legal obligation</p> <p>Legitimate interests</p>	<p>To manage our business efficiently and properly in accordance with normal business practices, legal</p>

What we use your data for	Legal Basis for Processing	Legitimate Interests
management of the programme and our business		<p>requirements and to optimise its value for shareholders</p> <p>To ensure that we run our business in accordance with good business principles and meet corporate governance, accounting and audit standards</p>
To conduct statistical research and surveys in relation to the Rewards4Golf programme, to help us improve our services to members and to ensure that we present the programme content in the most effective way	<p>Archiving and research</p> <p>Legitimate interests</p>	To develop new products and services and improve existing ones
To develop new products and services linked to the Rewards4Golf programme	<p>Archiving &amp; Research</p> <p>Legitimate interests</p>	To develop new products and services and improve existing ones
To improve the effectiveness of our marketing communications, including online advertising via social media and other channels and through personalisation of content we provide to you to recommend things we believe you'll like	Legitimate interests	To improve the effectiveness of our communications
To assist with the administration of the programme website and for internal purposes, including conducting data and statistical analysis as well as for testing purposes	Contractual performance and legitimate interests	<p>To provide efficient customer care and services</p> <p>To ensure that our technology operates efficiently and without error</p> <p>To assess which of our services may be of interest to you and to tell you about them</p> <p>To develop new products and services and improve existing ones</p> <p>To obtain customer feedback</p>

What we use your data for	Legal Basis for Processing	Legitimate Interests
To ensure that records in relation to the Rewards4Golf programme and our business are maintained and kept up to date as well as to protect our business reputation	Legal obligation and legitimate interests	<p>To manage our business efficiently and properly in accordance with normal business practices, legal requirements and to optimise its value for shareholders</p> <p>To ensure that we run our business in accordance with good business principles and meet corporate governance, accounting and audit standards</p>
<p>In the proper management of our business and that of Rewards4Golf generally</p> <p>For corporate activity, such as a sale, transfer, merger or re-organisation of the Rewards4Golf business</p>	<p>Legitimate interests</p> <p>Our legal duties</p>	<p>To manage our business efficiently and properly in accordance with normal business practices, legal requirements and to optimise its value for shareholders</p> <p>To ensure that we run our business in accordance with good business principles and meet corporate governance, accounting and audit standards</p>

### Where we collect information about you from

The majority of personal information we get directly from you and your activities as a programme member but we may also collect personal information from other sources, namely: 1) Our [Programme Partners](#); and 2) social media channels such as Facebook, Google and Twitter.

### Do you share my data with other organisations?

Our role is to provide you with the services connected to your membership of the Rewards4Golf programme. We only share your personal information with others if:

- you ask us to or give us your permission to share it;
- it is necessary to track the transactions and collection of Rewards4Golf points through our [Retail Partners](#) or our other [Programme Partners](#);
- it is necessary to enable us (or trusted third parties, such as Google, Inc. ("Google")) to analyse how our website is being used by members and to optimise and improve the Rewards4Golf website and our services;
- this is necessary for trusted third parties (for example, a data management and profiling organisation such as Experian) to match your personal information against other information they hold about you - such as age, gender, demographic information, and known interests - and

provide that information to us to help us provide the services and improve your experience with the Rewards4Golf programme; or

- we engage in a corporate activity, such as a sale, transfer, merger or re-organisation of the Rewards4 business (including Rewards4Golf).

In exceptional circumstances, we may share your information without your permission if we reasonably believe you might be breaking the law, for example on hate speech, and such disclosure is allowed under the relevant laws, including Data Protection law.

When we share your data outside of Rewards4Golf we will:

- always share it in a secure way; and
- not permit it to be used for third party marketing purposes.

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate data on your usage of the Rewards4Golf programme to calculate the percentage of members accessing a specific feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

### **How do you personalise the experience that I have with the Rewards4Golf programme?**

We may use your online browsing behaviour as well as details of your online transactions and engagement activities with our [Retail Partners](#) or with our other [Programme Partners](#) which will help us better understand you as a member, provide you with personalised offers and services and help us to better meet your needs as a member.

### **Will I be contacted for marketing purposes?**

Yes. As a member of the Rewards4Golf programme, we will keep you updated by e-mail with points earning opportunities for programme members as well as how to make great savings with our partners. These will include:

- Points earning opportunities with our [Retail Partners](#).
- Points earning opportunities with our [Programme Partners](#).
- Points earning opportunities with other third parties which we think you'll be interested in.
- Exciting and relevant competitions and promotions within the programme that we are running for members.
- Regular newsletters about the Rewards4Golf programme as well as member exclusive offers.

As you may expect, we tailor the communications that you receive based on information and preferences that you have previously provided (such as your favourite retailers) and based on your activities on the Rewards4Golf website, through our Mobile App or on the Points Reminder while signed-in. This is so that we can give you the most relevant and rewarding experience with the programme.

We want to ensure that we provide you with relevant marketing communications relating to the programme and our products and services, as well as those of our [Retail Partners](#) and other [Programme Partners](#). To achieve this, we may measure the effectiveness of our marketing communications as well as your responses to marketing communications relating to products and services we offer.

It's easy to change your mind in relation to the marketing communications. If you want to stop (or start) receiving them you can let us know in one of three ways:

Online:

- Log-in to your account
- Click on 'Contact Preferences'

By emailing us:

- [hello@rewards4golf.com](mailto:hello@rewards4golf.com)

By writing to:

- Customer Service Team, Rewards4Golf, Suite 5-6 Faraday Court, Centrum 100, Burton on Trent, Staffordshire, DE14 2WX

Please allow up to 72 hours before you are unsubscribed from all communications that we may send.

***Please note that if you opt out of receiving marketing communications, without cancelling your membership of the Rewards4Golf programme, you will still receive information in relation to your Rewards4Golf account (for example, in relation to points that you have collected and/or spent).***

### **Advertising**

We may also use your information to provide you with targeted advertising through our website or through third party websites based on information we have collected concerning your preferences.

Some third party websites allow you to request not to see messages and communications from specific advertisers on their website. Please contact these third parties directly if you would like to make that request or if you need more information.

### **Will my information be held outside the European Economic Area (EEA)?**

Your personal information may be transferred internationally. Sometimes we will need to transfer your information out of the United Kingdom and the EEA, for example, where we work with Google or Facebook to provide you with targeted advertising through our website or through third party websites.

Countries to which we transfer information may have different standards for controlling how your information is used and protected and these standards may not be as strict as those in place in the United Kingdom and EEA. If we transfer your information to a country which does not have data protection laws which offer an adequate level of protection for your information, we will make sure that the organisation which receives your information is a participant in the US Privacy Shield Framework (for more information, please visit the [Privacy Shield website](#)), puts in place appropriate safeguards to protect your information, such as standard contractual clauses as adopted by the European Commission from time to time, or otherwise ensure that we can transfer your information in a way that complies with data protection law.

### **Can I change or delete my data?**

Absolutely, you can change the data that we hold on your account or ask us to delete that data at any time.

You can amend the information we hold on you by logging into your account and visiting the 'My Profile' page.

To request for your account to be deleted, you can do this by emailing us at [hello@rewards4golf.com](mailto:hello@rewards4golf.com).

If you choose to close your account, this will erase any personal information that we hold about you. It will mean that any data about how you've used Rewards4Golf will be made anonymous, and any data that has enabled you to collect points will also be anonymised and archived.

Please bear in mind though, once you request to close your account (and have your details deleted), you will lose any points that you have collected should you wish to re-open your account at a later date.

### **How long will you keep my data for?**



Rewards4Golf will only hold your personal information on our systems for as long as is reasonably necessary for the purposes of providing the services to you (and/or as set out in the [Rewards4Golf Member Agreement](#))

If you ask for your Rewards4Golf account to be closed, then your personal information will be deleted from our systems. Please note that any transactional information relating to your account will be anonymised for analytical and business critical process purposes. This information will be archived for 6 years, until it is no longer necessary for us to retain it.

For further information about closing your Rewards4Golf account, please [click here](#).

### **Can I see the information you have about me?**

Of course. You have the right to request all personal information that Rewards4Golf holds about you (and how we obtained it). This is called a Subject Access Request.

### **Your other rights**

Under data protection law, you have other rights as well. Briefly, these are:

**Correcting your information** – We want to make sure that your personal information is accurate, complete and up to date and you may ask us to correct any personal information about you that you believe does not meet these standards.

**Deletion of your information** – You have the right to ask us to delete personal information about you where:

- You consider that we no longer require the information for the purposes for which it was obtained
- We are using that information with your consent and you have withdrawn your consent – see ‘Withdrawing consent to using your information’ below
- You have validly objected to our use of your personal information – see ‘Objecting to how we may use your information’ below
- Our use of your personal information is contrary to law or our other legal obligations.

**Objecting to how we may use your information** – you have the right at any time to require us to stop using your personal information for direct marketing purposes. In addition, where we use your personal information to perform tasks carried out in the public interest or pursuant to the legitimate interests of us or a third party then, if you ask us to, we will stop using that personal information unless there are overriding legitimate grounds to continue.

**Restricting how we may use your information** – in some cases, you may ask us to restrict how we use your personal information. This right might apply, for example, where we are checking the accuracy of personal information about you that we hold or assessing the validity of any objection you have made to our use of your information. The right might also apply where this is no longer a basis for using your personal information but you don't want us to delete the data. Where this right to validly exercised, we may only use the relevant personal information with your consent, for legal claims or where there are other public interest grounds to do so.

**Portability** – if we process personal information that you provide to us on the basis of consent or because it is necessary for the performance of a contract to which you are party, and in either case that processing is carried out by automated means, then you have the right to have that personal information transmitted to you in a machine-readable format. Where technically feasible, you also have the right to have that personal information transmitted directly to another controller.

**Automated processing** – if we use your personal information on an automated basis to make decisions which significantly affect you, you have the right to ask that the decision be reviewed by an individual to whom you may make representations and contest the decision. This right only applies where we use your information with your consent or as part of a contractual relationship with you



**Withdrawing consent using your information** – where we use your personal information with your consent you may withdraw that consent at any time and we will stop using your personal information for the purpose(s) for which consent was given.

### **Exercising your rights**

If you wish to exercise any of these rights you may make a request either:

By writing to:

- Customer Service Team, Rewards4Golf, Suite 5-6 Faraday Court, Centrum 100, Burton on Trent, Staffordshire, DE14 2WX

By emailing us:

- [hello@rewards4golf.com](mailto:hello@rewards4golf.com)

To verify that you are the account holder we will need you to provide photocopies of two of the following documents:

- Passport;
- Driving licence;
- Birth certificate;
- Utility bill (from last 3 months);
- Bank statement (from last 3 months).

### **Changes to our Privacy Policy**

We keep this Privacy Policy under regular review and will place any updates on this website. Paper copies of the Privacy Policy may also be obtained:

- By printing a PDF version of this policy [here](#).
- By writing to our Customer Service Team, Rewards4Golf, Suite 5-6 Faraday Court, Centrum 100, Burton on Trent, Staffordshire, DE14 2WX.

This Privacy Policy was last updated on 18<sup>th</sup> August 2021.

### **Contact information and further advice**

If you have any queries about this Privacy Policy or just wish to chat to our friendly customer services team or our data protection officer please contact them in any of these ways:

By writing to:

- Customer Service Team, Rewards4Golf, Suite 5-6 Faraday Court, Centrum 100, Burton on Trent, Staffordshire, DE14 2WX

By emailing us:

- [hello@rewards4golf.com](mailto:hello@rewards4golf.com)
- [dpo@rewards4group.com](mailto:dpo@rewards4group.com)

### **Complaints**

We seek to resolve directly all complaints about how we handle personal information but you also have the right to lodge a complaint with the Information Commissioner's Office:

Online: <https://ico.org.uk/global/contact-us/email/>

By phone: 0303 123 1113

By post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF