

Privacy Policy

Before we get into the detail, we just want to make sure you know that your privacy is important to us.

We know you've heard this all before, but quite frankly, we mean it.

You've placed your trust in us by using the iBookGOLF services and we value that trust. That means we're committed to protecting and safeguarding any personal data you give us.

This Privacy Policy explains who we are, how and why we collect, share and use personal information about you, and how you can exercise your privacy rights.

If you have any questions, or any confusions about our use of your personal information, please contact us using the contact details provided on the "How to contact us" section below.

Who We Are

iBookGOLF offers golf clubs a platform to sell their teetimes through and other golf related and enhancing services (such as competitions, volunteering opportunities and events) through our own website ("Website"), mobile app and blog as well as through other online platforms (collectively, the "Platform").

Why point that out, you ask?

- Well, here's the thing, all the information that follows in this Privacy Policy applies to all of these platforms. Several platforms, one Privacy Policy.
- This Privacy Policy applies to any kind of personal information we collect through the Platform or other contact you may have with us that is connected to the Platform (such as contacting our Customer Service team via email).

iBookGOLF is committed to preserving the privacy of all its members and visitors to our Website.

Please read the following Privacy Policy to understand our practices regarding how we use and protect the personal information that you provide to us.

How to Contact Us

For the purpose of the General Data Protection Regulation 2016 ("Act"), the data controller is:

ibookGOLF d.o.o.

Company reg. no 559122-9389

Rakuševa 30, Ljubljana

Slovenia

contact@ibookgolf.com

Contacting Us

For questions or concerns about this Privacy Policy, or our use of your personal information, please contact us by email at contact@ibookgolf.com.

If you have general questions about your account or how to contact Customer Service for assistance, please visit our online help centre at contact@ibookgolf.com.

Please note that if you contact us, we may need to authenticate your identity before fulfilling your request.

We will talk you through the process of doing this, and it really doesn't take much time or effort. But as security of your information is important to us, we need to be extra careful.

What Personal Information We Collect and Why

The personal information that we may collect about you broadly falls into the categories set out at the bullet points below.

What do we do with the information we collect?

The short answer is, we provide you with an amazing set of products and services that we strive to improve relentlessly.

Information that you Provide Voluntarily

Certain parts of the Platform may ask you to provide personal information voluntarily.

For example, we may ask you to provide your contact details in order to register an account with us, to subscribe to marketing communications from us (e.g. to share information about our products, services and promotional offers that we think may interest you), and/or to submit enquiries to us (e.g. by interacting with our Customer Services Team).

The personal information that you are asked to provide, and the reasons why you are asked to provide it, will be made clear to you at the point we ask you to provide your personal information.

Information that we Collect Automatically

When you visit the Platform, we may collect information automatically from your device (be it a phone or a computer).

In some countries, including countries in the European Economic Area, this information may be considered personal information under applicable data protection laws.

- Specifically, the information we collect automatically may include information like your IP address, device type and software characteristics, unique device identification numbers, browser-type, broad geographic location (e.g. country or city-level location) and other technical information.
- We may also collect information about how your device has interacted with the Platform, including the pages accessed and links clicked.
- Through our app we may also find out your location, however you can turn this feature off through your device's settings.

Collecting this information enables us to verify your identity and position us to better prevent fraud, and to understand the users of the Platform, such as where they come from and what content is of interest to them.

We use this information for our internal analytics purposes, to improve the quality our service, and to tailor your experience to you by displaying content and services that we think is specifically suited to you.

Some of this information may be collected via the use of cookies, web beacons and similar tracking technologies. See our Cookie Policy for more information on how and why we use cookies and similar technologies. Information that we obtain from third party sources

From time to time, we may receive personal information about you from third party sources (including social media service providers), but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

The types of information we collect from third parties include information about your online interaction with such parties and we use this information to monitor and analyse trends and usage, improve the quality our service and tailor your experience and recommend products and services that we think you'll be interested in.

Who We May Disclose Your Information to

We may disclose your personal information to the following categories of recipients:

1. To our group companies, third party services providers and partners who provide data processing services to us (for example, to support the delivery of, provide functionality on, or help to enhance the security of our Website; or to perform analytics in order to improve the quality of our services and enhance your experience), or who otherwise process personal information for purposes that are described in this Privacy Policy or notified to you when we collect your personal information. The majority of our service providers operate within Europe, however sometimes they may send your personal information to the USA. A couple of examples of the service providers we use and why are set out below. If you want any more information, please do ask.

- Google assists us with our analytics and helps us to set advertisements that reflect your interests;
- dSpot assists us with sending out our email communications; and
- Facebook helps us to assess how effective our advertising is and also helps us to set advertisements that reflect your interests;

2. To any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;
3. To help third parties display interest-based advertising using information you make available to us when you interact with our sites, content, or services. Interest-based ads, also sometimes referred to as personalised or targeted ads, are displayed to you based on information from activities such as purchasing through our sites, use of devices, apps or software, visiting sites that contain our content or ads, or interacting with our tools. We offer you choices about receiving interest-based ads from us. You can choose not to receive interest-based ads from us by opting out here. You will still see ads but unfortunately, they will not be personalised and therefore may not be relevant to you;
4. To an actual or potential buyer (and its agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Policy; and
5. To any other person or subjects with your consent to the disclosure as stated below but not limited to:
 - Golf clubs where you purchase teetimes or complete bookings with will receive data about you and the arriving party in order to complete their service and when this happens they become "Data Controller" for the information they receive regarding your booking or purchase. We never transfer or disclose any credit card details, that information is stored with our payment gateway Stripe.com and the golf club can only through encrypted tokens debit your card according to the purchase or the no-show and cancellation policy.
 - Third-party vendors who provide services or functions on our behalf, including credit card processing, business analytics, customer service, marketing, distribution of surveys or sweepstakes programs, and fraud prevention. We may also authorize third-party vendors to collect information on our behalf, including as necessary to operate features of our website or our

Apps or to facilitate the delivery of online advertising tailored to your interests. Third-party vendors have access to and may collect information only as needed to perform their functions and are not permitted to share or use the information for any other purpose. They are also required to follow the same data security practices that we ourselves adhere to. Please note that these third party service providers may be established in countries that might not offer a level of protection for your personal information that is equivalent to the one offered in your country of residence. However, we will endeavor to protect all personal information we collect from you in accordance with strict data protection standards and GDPR.

- Business partners with whom we may jointly offer products or services, or whose products or services may be offered on our website or through our Apps. You can tell when a third party is involved in a product or service you have requested because their name will appear, either alone or with ours. If you choose to access these optional services, we may share information about you, including your personal information, with those partners. Please note that we do not control the privacy practices of these third-party business partners.
- Referring websites if you were referred to this website from another site (for example, through a link you clicked on another site that directed you to this one), we may share some information about you with that referring website. We encourage you to review the privacy policies of any website that referred you here. This enables us to provide you, if you have consented to it, with information about products and services, both golf-related and other, which we believe might interest you.

Legal Basis for Processing Personal Information (EEA Visitors Only)

If you are a visitor from the European Economic Area, our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

We will normally collect personal information from you only where we have your consent to do so, where we need the personal information to perform

a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are. Please have a look at our Cookie Policy if you are concerned about the how and why of the information collected through our use of cookies.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the “How to contact us” heading above.

How We Keep Your Personal Information Secure

We use appropriate technical and organisational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information.

Where you have chosen a password that allows you to access certain parts of the Website, you are responsible for keeping this password confidential. We advise you not to share your account log-in details, including your password, with anyone. We will not be liable for any unauthorised transactions entered into using your name and password.

The transmission of information via the internet is not completely secure. Although we will take steps to protect your information, we cannot guarantee the security of your data transmitted to the Platform.

Data Retention

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

We will not keep personal information for longer than 2 years after your latest login to iBookGOLF.

International Data Transfers

Your personal information may be transferred to, and processed in, countries other than the country in which you are resident.

These countries may have data protection laws that are different to the laws of your country.

Our Website servers, group companies and third party service providers and partners operate around the world. This means that when we collect your personal information we may process it in any of these countries.

However, we have taken appropriate safeguards to require that your personal information will remain protected in accordance with this Privacy Policy.

These safeguards are either (a) having the model clauses appended to the contract we have with the third party; or (b) the third party is in a country that has adequate data protection laws.

Automated Decision-Making

In some instances, our use of your personal information may result in automated decisions being taken (including profiling) that legally affect you or similarly significantly affect you.

Automated decisions mean that a decision concerning you is made automatically on the basis of a computer determination (using software algorithms), without our human review.

For example, we use automated decisions to, for example, choose how to order our custom tiles on our website for you.

We have implemented measures to safeguard the rights and interests of individuals whose personal information is subject to automated decision-making, including removing such automated decision making upon a written request from a member.

When we make an automated decision about you, you have the right to contest the decision, to express your point of view, and to require a human review of the decision.

You can exercise this right by contacting us using the contact details provided under the “How to contact us” heading above.

Your Data Protection Rights

You have the following data protection rights:

If you wish to access, correct, update or request deletion of your personal information, you can do so at any time by contacting us using the contact details provided under the “How to contact us” heading above or alternatively you can access our right to be forgotten and subject access request forms [here](#).

Please note, that if you request us to delete your data you must uninstall our app (if you have been using this on your phone) to remove any residual data stored on your device”.

In addition, if you are a resident of the European Union, you can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information.

Again, you can exercise these rights by contacting us using the contact details provided under the “How to contact us” heading above.

As a recommendation service, we think it is really important that we send you communications about our products, services and promotional offers that we think may interest you, as we would hate to think you missed out on a discount with one of your favourite golf clubs!

However, you have the right to opt-out of marketing communications we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you or through your account settings.

Please note that you cannot unsubscribe from certain email correspondence from us which is not for marketing purposes, such as messages relating to your account transactions or when we are required to email you about system updates or issues.

To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided under the “How to contact us” heading above.

Please note, that to opt out of receiving mobile push notifications from iBookGOLF, you can use your mobile device’s settings functionality to turn them off.

Similarly, if we have collected and process your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority. (Contact details for data protection authorities in the European Economic Area, Switzerland and certain non-European countries (including the US and Canada) are available here).

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

Children

iBookGOLF is not intended for use by children under 16 years old. If you learn that your minor child has provided us with personal information without your consent, please contact us on contact@iBookgolf.com.

Updates to this Privacy Policy

We may update this Privacy Policy from time to time in response to changing legal, technical or business developments.

When we update our Privacy Policy, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Policy changes if and where this is required by applicable data protection laws.

Cookies and Similar Tracking Technology

We use cookies and similar tracking technologies (collectively, “Cookies”) For more information about the types of Cookies we use, why and how you can control Cookies, please see our [Cookie Policy](#).

Data Protection Code of Conduct

Your data will be protected in accordance with the Data Protection Act 1998 and, once implemented, the General Data Protection Regulation.

Your personal data will be protected according to the Code of Conduct for Service Providers, a common standard for the research and higher education sector to protect your privacy.

We’re sorry to say this, but if you disagree with our Privacy Policy you should cancel your account and stop using our services. We will be sad to see you go, but will welcome you back with open arms if at any point you change your mind.