

PRIVACY POLICY

Berwick Montuna Golf Club (“BMGC” or “we” or “us” or “our”) recognises the importance that our members, donors, visitors to our websites, users of our mobile applications, and all other people who engage with us or who are involved with us in any capacity (for example staff, officials, club administrators, golfers, sponsors, volunteers, spectators, etcetera), place on the privacy of their information. We created this privacy policy statement (“Privacy Policy”) to demonstrate our firm commitment to protecting the privacy of your information as described below and to explain the privacy policies and procedures of BMGC.

This Privacy Policy describes how BMGC collects, uses, and shares information gathered from visitors to the web sites (the “Web Sites” or the “BMGC Web Sites”) and mobile applications (the “Apps”) where this Privacy Policy appears (the Web Sites and the Apps are collectively referred to herein as the “Services”), and data collected offline from people who engage with us or who are involved with us in any capacity.

1. **POLICY CHANGES** We suggest you review this Privacy Policy periodically, as we may modify it from time to time as our Services evolve. We will notify you of material changes or updates to our Privacy Policy as required by law.

2. WHAT INFORMATION DOES BMGC COLLECT?

BMGC collects two types of information from users of the Services, and from people who otherwise engage with us or who are involved with us in any capacity:

- (1) non-personal information, for example, which is collected automatically as you interact with our Services that cannot, of itself, be used to specifically identify or contact an individual (except as described below) (“Non-Personal Information”);
- (2) information that can be used to specifically identify or contact an individual (“Personal Information”).

Non-Personal Information If you are using one of our Services, or if you otherwise engage with us or are involved with us in any capacity, we may gather certain Non-Personal Information about you. For example, when you use our Services we automatically recognise and collect: • your Internet service provider and domain name; • usage and “clickstream” data, which includes the type of device and browsing software you are using and their settings (including language settings), your browser ID, general geographic information derived from your IP address, URL information, the address of the web site from which you linked to a Service, the pages, content or ads you see or click on during your visit and when and for how long you do so, items you download, any search terms you have entered on the Services or a referral site, and the time stamps of your visits to the Services; • App data, including counts of the screens and features of the App that are used, the countries from which the App is used, time stamps of uses, device language settings, and the types of devices, operating systems, carriers, IP addresses and wireless connections our users are using to access the App; • unique numerical identifiers, including mobile device identification numbers; • information about your interactions with our email messages; • geolocation information, including precise information about the location of your mobile device, to the extent that such information is provided by your device.

Personal Information When you use any of the Services, or if you otherwise engage with us or are involved with us in any capacity, you may be asked to provide or choose to provide Personal Information, or we may otherwise collect Personal Information, which may include:

- your Internet Protocol (IP) Address
- contact information, such as your name, physical address (including post code), e-mail address, telephone and/or fax number, GOLF ID number, Membership Number, Membership Category
- password or other login credentials (selected by you) to create and access your accounts on the Services
- credit card information (for example, if you make a purchase or donation through the Services)
- health or physical information (for example, if you submit a request through the Services to use motorised transportation at a BMGC event, or if we are managing travel for you as a part of a representative team, or if a ruling is required under our Gender Policy, etcetera)
- golf background, such as whether you are an amateur or a professional, the name and address of any golf clubs at which you may be a member, and your GA Handicap
- information you submit when you contact us or post on the Services; and
- demographic information, such as your age and gender.

The above are only examples of the types of Personal Information we may collect. The actual types of Personal Information collected depend on the specific product or service you request, the types of transactions you conduct on the Services, the various activities in which you participate, or the capacity in which you engage with us or are involved with us.

3. HOW DOES BMGC COLLECT MY INFORMATION?

BMGC uses passive tracking tools to automatically collect Information, such as browser cookies, Web beacons, pixels or similar technologies. We collect information about users over time when you use the Services or view our emails. We

may also have third parties collect information this way, such as ad networks, web analytics companies, and social networking platforms. You can control cookies and tracking tools. If you turn off cookies, certain features and functions of the Services may not be available to you. We may collect information from you when you purchase goods and services, or make a donation to BMGC, or create an account with BMGC, or have an account with BMGC created on your behalf where the creation of such an account is known by you or is fundamental to the services we provide (for example, an account in the GOLF Connect system provided by Golf Australia), or contact us through the Services, or submit an entry application to play in an event, or submit other forms or information through the Services, or if you otherwise engage with us or are involved with us. We may also receive information about you from third parties. For example, our business partners, service providers, and social media platforms may provide us with information about you. We combine information. Information obtained through the Services (including both Personal Information and Non-Personal Information) may be combined and used in conjunction with information obtained through sources other than the Services or at different times, including both offline and online sources and from third parties.

4. HOW DOES BMGC USE MY INFORMATION?

BMGC uses your information to:

- *understand your needs and interests and to personalise your experience on the Services*
- *provide you with better products and services and to improve our Services*
- *deliver products, services, information, or to meet our operational obligations (for example, we may use your information for processing and evaluating your entry application, to appropriately serve you, to appropriately administer and manage your engagement with golf or with any Australian golf industry stakeholder, for processing your membership application, for processing transactions on certain of our Services, for processing your registration on certain of our Services, and for contacting you with regard to your membership, registration, transactions and other activities or accounts on our Services)*
- *manage events*
- *communicate with you or update you about your account, our relationship, or with regard to this Privacy Policy or the BMGC Terms of Use*
- *send you newsletters and marketing information, such as updates and notices about BMGC (or select third parties) products, services, and benefits we think you would be interested in*
- *serve you tailored ads on our Services and elsewhere based on your interests and history with us. To learn about your choices with regard to interest-based advertising and marketing communications, please see the Choices section below*
- *contact you for market research*
- *send push notifications and other information through our Apps*
- *for security purposes (for example, we may use your information to protect BMGC, our users, employees, sponsors and business partners, donors, and players) and to protect our Services.*

We may use the information we collect as otherwise permitted by law or as we may notify you from time to time.

5. SHARING WITH THIRD PARTIES

BMGC may share your information with third parties in certain circumstances. For example, we will share your information:

- *with service providers, technical consultants, and vendors who assist us, where such sharing is reasonably necessary to provide you with a requested service or to operate and maintain the Services (such as Web site or database hosting companies, address list hosting companies, e-mail service providers, analytics companies, advertising companies, distribution companies, fulfillment companies, payment processing companies and other similar vendors and services providers)*
- *if we have to in order to comply with legal requirements, such as in response to court orders or subpoenas, or as part of a government or administrative agency investigation*
- *with our affiliates*
- *with third-party auditors*
- *to permit us to investigate suspected fraud, harassment, or other violations of any law, rule, or regulation, the rules or policies of our Services, or the rights of third parties, or to investigate any suspected conduct which BMGC deems improper*
- *when we have reason to believe that someone is causing injury to or interference with our rights or property, other users of the Services, or anyone else that could be harmed by such activities*
- *to an acquirer or successor entity in the event we, or a substantial portion of our assets, undergo a business restructuring, transfer of ownership, or similar transaction*
- *as otherwise permitted by this Privacy Policy or as expressly permitted by you from time to time.*

Except as provided above, BMGC does not share your Personal Information with any third party without your opt-in permission. However, we may share Non-Personal Information with third parties for their marketing and other purposes, with or without your consent. We may also disclose Non-Personal Information regarding our users and user behaviour as a measure of interest in, and use of, our Services to third parties, including, for example, aggregate data, such as overall patterns or demographic reports that do not describe or identify any individual user.

6. THIRD-PARTY ADVERTISERS

Please note that at times, some of the advertisers on the Services and their and our ad service providers (including affiliate network providers and third-party ad servers) may set cookies or use related technologies or web beacons when you view and/or click their advertising banners, links or other ads. Information from cookies, tracking pixels, clear GIFs and other tracking technologies placed through third-party ads and links may be collected directly by those advertisers and ad service providers and used to cause relevant ads to be displayed to you. For example, these companies may collect and use information about you and your visits to the Services and other Web sites in order to provide advertisements about goods and services of interest to you. These advertisements may appear on the Services and on other Web sites. The advertiser's privacy policy and/or that of its service provider will govern the use of this information, and we are not responsible for the privacy practices of such companies. We encourage you to read these businesses' privacy policies to learn about how they treat your information.

7. HOW DOES BMGC TRY TO PROTECT MY INFORMATION?

The security of your information is important to us. However, while we strive to protect your information, due to the inherent open nature of the Internet we cannot guarantee that communications between you and any Services, or information stored on any Web Site or servers, will be free from unauthorised access by third parties such as hackers. Your use of the Services demonstrates your assumption of this risk. You should be aware that any information and content, including Personal Information you post to message boards, community tools, or other publicly accessible forums, may be viewed and used by anyone with access to such forums. By using these services, you assume the risk that the Personal Information provided by you may be viewed and used by third parties.

8. COMMUNITY TOOLS AND SOCIAL MEDIA

If you desire to have access to certain restricted sections of our Services, you will be required to become a "MEMBER" and submit certain Personal Information requested during the registration process and described above. Once registered, you may provide additional information on your profile to better identify yourself and find new friends and opportunities on the Services that may be available. Providing additional information beyond what is required at registration is entirely optional and provided at your own risk. Depending on your profile settings (if applicable), BMGC may display your profile to other registered users to enable you to connect with them on BMGC's network, if such a feature is available. You may be able to access and control the information included in your profile and decide whether you want your profile made visible to other registered users and perhaps the general public. Our default privacy setting with respect to your profile may be set to make your profile "publicly" available, unless and until you choose otherwise, which you can do by opting out in the account preferences area of your Web Site account (if applicable), or by contacting us using the information set forth in the Contact Us section of this Privacy Policy below. To deactivate your user account, you may email info@berwickmontuna.cm.au, or call us at (03) 9707 1887, or write to us at Berwick Montuna Golf Club, PO Box 126, Beaconsfield, Victoria, 3807 or follow the procedures in the Contact Us section of this Privacy Policy. We will remove your profile but may retain any record of your information that is necessary to comply with applicable federal, state, or local law. By registering for a membership of the Club, you acknowledge and consent that, even after removal of your profile and Personal Information from our Web Sites, your information may remain viewable in cached and archived pages of individuals who have copied or stored such information or content. For the avoidance of doubt, "profile" in the context of this Privacy Policy does not include any handicap record. It is an integral feature of the official handicap system in Australia that all handicap records are publicly available to anyone who wants to view them on the Services. This is a key part of the design of the GOLF Connect system and it provides a further layer of protection against handicap manipulation. All GA Handicaps are owned by Golf Australia. Golfers who obtain and use a GA Handicap are doing so under licence from GA. Any golfer who wishes to use a GA Handicap submits to the mandatory obligation to have their handicap record be publicly available for viewing.

9. YOUR CHOICES

You can control cookies and tracking tools. If you turn off cookies, certain features and functions of the Services may not be available to you. You can opt out of receiving promotional emails from BMGC. To do so, you can set your online Contact Details to private or email us at info@berwickmontuna.com.au. Please understand that if you opt out of receiving promotional correspondence from us, we may still contact you in connection with your relationship, activities, transactions and communications with us. If you wish to stop receiving push notifications through the App, you may change the settings for the App and/or your device. The precise geographic location of your device may be transmitted to our servers in real time any time that the App is running (even if you are not actively using the App or it is minimised on your device). You

may stop allowing us to have access to your device's location information by accessing the App's location settings on your device and setting your device not to share its location with us. Please note that BMGC is not responsible for removing your information from third-party lists or databases. Certain uses of certain of your information may be restricted: See <https://www.oaic.gov.au/privacy/guidance-and-advice/direct-marketing/>.

10. LINKS TO OTHER WEB SITES

Any of the Services may contain links, banners, or advertisements to other web sites. When you click on such links, banners, or advertisements, the privacy policies of the web sites to which you are linked and/or their service provider (as applicable) will govern the use of your information collected on such sites. BMGC does not have access to or control over any technologies or practices that may be used by third parties. This Privacy Policy applies solely to information collected by BMGC via its Services. We are not responsible for the privacy practices of other web sites. We encourage our users to read the privacy statements of each and every web site visited after leaving the Services through such a link, banner or advertisement, in order to learn how such third parties may treat your information.

11. CHILDREN

If You are under the age of 18, You acknowledge and understand that You will not provide any personal information through the BMGC Services without the express permission of Your parent or legal guardian (when this parent or legal guardian is legally permitted to authorise such data provision). If BMGC learns we have collected Personal Information from a person under the age of 18 without such permission, we will delete this information.

12. AUSTRALIA ONLY

The Services are intended only for users in Australia. By using the Services, you agree and acknowledge that the Services are hosted in Australia and that information collected through the Services (including Personal Information) will be stored and processed in Australia. By using the Services, you consent to such transfer and the application of the laws of Australia, which may not be as protective or comprehensive as those that exist in your home jurisdiction. Your information may also be transferred to entities other than BMGC and its affiliates, which entities may be located in countries outside the European Economic Area ("EEA"), including Australia. Each of these countries has different privacy laws that afford varying levels of protection for your information, and such laws may not be as protective or comprehensive as those that exist in your home jurisdiction.

13. CHANGE INFORMATION

To the extent available, you can access, view and change your preferences, profile, and other information by visiting your online membership profile at www.berwickmontuna.com.au or emailing info@berwickmontuna.com.au, or calling us at (03) 9707 1887, or writing to us at Berwick Montuna Golf Club, PO Box 126, Beaconsfield, Victoria, 3807. You may also inform us of changes by following the procedures described in the Contact Us section of this Privacy Policy, and BMGC will take reasonable steps to correct any information about you that is incorrect.

14. CONTACT US

BMGC welcomes your questions and comments about privacy. Please feel free to contact us by sending an email to info@berwickmontuna.com.au, or calling us at (03) 9707 1887, or writing to us at Berwick Montuna Golf Club, PO Box 126, Beaconsfield, Victoria, 3807.

OWNER

The General Manager or nominated person will ensure the policy is reviewed bi-annually or as required for accuracy and relevance.

General Manager:
(Signed)



Date: 15th October 2024