

GPL Privacy Policy

Golf Premier League Pty Ltd ACN 156 301 370 ("Golf Premier League", "GPL", "we", "us" or "our") is committed to complying fully with its obligations under the Australian Privacy Principles ("APPs"), which are contained in the Privacy Act 1988 (Cth) ("Privacy Act").

This Policy outlines the types of personal information GPL collects and explains how it collects, uses, discloses and holds that information. The Policy also explains how you can gain access to personal information that GPL holds about you and provides contact details for GPL.

1. What personal information does GPL collect?

If you access the GPL website, hold or participate in a golf competition associated with or using the GPL competition or GPL rules, or ask GPL to provide you with goods or services (including choosing to receive promotional information), we may ask you to provide information that is personal in nature and includes things such as your name, golf link number, postal address, email address and mobile number. We may also ask you for additional anonymous demographic information, which is not unique to you, such as your post code, age, gender, preferences, interests and any of your preferences in respect of offers and promotions run by GPL and other organisations such as GPL's business partners and sponsors.

When we conduct market research and profiling, we may also ask you for your opinions about goods and services related to those that we provide, your website use and your general activities and participation in the sport of golf.

We also collect information about visitors to our website using cookies and code embedded in this website, as described in the "Site Statistics" and "Online collection of personal and non-personal information" sections of this Policy.

Generally, if we do ask you for personal information, we will endeavour to say which information we require and which information is optional. You can refuse to provide GPL with the personal information that it requests from you. However, if you do not provide such information, we may not be able to provide you with our goods or services.

GPL does not collect information that is unrelated to its goods and services or that it does not need. For example, GPL does not collect sensitive information (such as information about your health or political beliefs) because it does not need it in order to provide you with our goods or services.

If you do not wish to be notified about goods, services or promotions offered by GPL, or if you do not wish to receive any further communications from GPL, you can opt-out of any, or all, GPL communications by directly contacting GPL at any time.

2. How is Personal Information Used?

The primary purpose for which GPL collects personal information is so that we can provide you with goods and services, administer your use of those goods and services, and provide you with information in relation to them. We will also use it for purposes related to the supply of our goods and services and the supply of the goods and services of our business partners and sponsors including, but not limited to, golf related goods and services, product research and development, and marketing, promotions and special offers.

GPL also uses your personal information for purposes incidental to these purposes including, without limitation, for the purpose of managing its relationship with you,

communicating with you effectively and updating you on our latest products, news and special offers whether from us or third parties. You may tell us not to disclose your personal information at any time by notifying us via our unsubscribe page.

3. Communication & Marketing

If you have held or participated in a GPL competition we may occasionally update you on our latest products, news and special offers and those of selected third parties via email.

4. Site Statistics

We may collect and disclose aggregate, anonymised statistics about the number of visitors to our websites or number of purchases made. We gather data regarding the visitors to our websites using cookies and code which is embedded in the site (and we may also use third party measurement and research services to assist us with such data gathering). Both the cookies and the embedded code provide statistical information about visits to pages on the site, the duration of individual page view, paths taken by visitors through the site, data on visitors' screen settings and other general information. GPL uses and stores this type of information, as with that obtained from other cookies used on the site, to help it improve the services to its members and users. Further information regarding the way in which this information is obtained and used can be obtained by contacting us at info@golfpl.com.au

5. Will Personal Information be given to anyone else?

If we disclose your personal information to any of our group companies or related entities, they may use it for the same purposes that we may (including so that they can update you on their latest products, news and special offers via e-mail, post & telephone). We may also provide your personal information to our business partners and sponsors in order to provide you with offers and promotions.

We try to limit the information we provide to third parties to the information they need to help us provide goods and services to you. Generally, GPL will not disclose personal information to individuals or organisations outside GPL without your consent - we will disclose where we have your consent or where it can be reasonably inferred from the circumstances that you consent to such disclosure. However, in the circumstances described in this Privacy Policy, personal information may be disclosed outside GPL.

6. Outsourcing

GPL may disclose personal information to third parties to whom it contracts out specialised functions. These third parties usually help us in providing goods and services to you, and include:

- sponsors and business partners;
- vendors promoting goods and services related to GPL or related to golf generally;
- distribution agencies (with whom we arrange to deliver certain communications to you on our behalf); and
- outsourced service providers (eg: market research agencies).

If GPL does disclose personal information to third party contractors under outsourcing or contracting arrangements, GPL will take steps to ensure that those contractors:

- handle your personal information consistently with the Australian Privacy Principles ("APPs");

- only use your personal information in order to provide the specific services or to perform the specific functions required by GPL; and
- store your personal information securely, and only for as long as is necessary to provide the required services or perform the required functions.

7. Disclosures required or permitted by law

GPL may also disclose personal information to individuals, corporations, organisations or governmental authorities without your consent if it is required to do so by law, or if the disclosure is permitted under the Privacy Act. GPL reserves the right to give information to law enforcement agencies should any content passing through our Website or systems raise suspicion of an illegal act.

8. Transfer of personal information overseas

Generally, your personal information will be processed in Australia. However, from time to time GPL will transfer personal information to overseas companies. For example, this may occur in the course of providing members with support services, product offerings, or when we outsource certain functions (eg: when we store personal information about members on servers that are hosted by an external offshore company).

If GPL does transfer your personal information overseas, we will take steps to ensure your personal information is given the same privacy protection in the destination country as it receives in Australia.

9. Personal information that you communicate or publish via GPL websites

GPL recommends that you do not publish or communicate personal information accessible to the public via our websites (eg: in our online community and in our forums) unless you want that information to be seen by others.

Should you choose to publish or communicate personal information, or select features on our websites that allow you to display, publish or communicate personal information about yourself to the public via our websites, you acknowledge that GPL cannot control the use of such personal information by others.

10. Transactional

We may also disclose your personal information to third parties outside our group of companies:

- in connection with a sale or purchase of GPL or any of its business or assets (or prospective sale or purchase of such); or
- if GPL or some or all of its assets are acquired (or proposed to be acquired) by a third party, in which case data containing personal information which we hold about our customers may be one of the transferred assets.

11. Access and Correction of Personal Information.

Under the Privacy Act, you generally have a right to seek access to the personal information that GPL holds about you and the purpose/s for which it is being held. However the APPs provide that there are some circumstances in which it is permitted or required to withhold access to some or all of that personal information. If GPL denies you access based on any of the exceptions set out in the APPs it will endeavour, where appropriate, to inform you of the exception under which the denial falls.

You also have the right to ask GPL to correct personal information about you that you think is inaccurate, incomplete or out of date. We encourage you to help us keep the personal information we hold about you accurate and up-to-date by updating your details immediately if you change them.

If you wish to access personal information that GPL holds about you, GPL asks that you make a request in writing to its Privacy Officer (contact details are set out below). Your request should state whether you are seeking access to all the personal information GPL holds about you or to particular personal information (in which case you should specify that in your request). You should also provide some form of identification (eg: a photocopy of your driver's licence or passport) so GPL can verify that you are the person to whom the personal information relates. You should also include details of how GPL can contact you in case it needs to discuss your request. If you need more information before making a formal request for access, please contact GPL's Privacy Officer, who can explain how GPL will handle your access request and assist you in making that request.

Depending upon your access request, we may impose a charge to recover our reasonable costs in providing you with details of this service. We will notify you of any such charge upon receiving your request and will confirm whether you wish to proceed and pay such charge. We will generally respond to a request of this type within 30 days of receiving it.

If you think that any of the personal information GPL holds about you is not accurate, complete or up to date, please provide GPL's Privacy Officer with your request for correction. It is GPL's policy to consider and respond to any requests for correction within 30 days of receiving it.

If GPL agrees that your personal information is not accurate, complete and up to date, it will correct such information for you. If it does not agree with your view, GPL will provide you with reasons for its view, and will provide you with an opportunity to make a statement of your view and have it included with the information.

12. Storage and Security of Personal Information

GPL takes reasonable steps to protect the personal information it holds and controls from such risks as loss, misuse, unauthorised access, destruction or disclosure. The means of protection GPL uses includes, but is not limited to firewalls, password access and secure servers and encryption of credit card transactions. At GPL, other than as provided for under this Policy, we only allow authorised personnel to access personal information, and it is a condition of employment with GPL that its employees maintain the confidentiality of personal information.

13. Destruction and de-identification of personal information

Unless a legal requirement provides otherwise:

- GPL will keep your personal information for as long as it requires such information (in accordance with the scope of the consent to use and purposes set out in sections 1 and 2);
- if you request in writing for GPL to destroy or de-identify your personal information that it has collected from you, GPL will take reasonable steps to destroy or permanently de-identify your personal information.

14. Online Privacy Issues

GPL will apply this Policy to all personal information it handles, whether collected online or otherwise. To the extent that this Policy applies to online privacy issues, it is to be read as forming part of the Terms of Use for GPL websites. This section is intended to provide more information about privacy for the users of GPL websites.

15. Online collection of personal and non-personal information

Generally, GPL collects personal information from you when you register to participate in a GPL competition or event, or when you otherwise visit or participate at our websites. If you have been a participant in a GPL competition you have already consented to receiving emails from GPL and/or its business partners presenting you with advertisements and promotional materials on or through the Website, at competitions or via email. This consent was included in the registration sheet.

GPL websites may also collect other information that may or may not be personal information. Each time you visit a GPL website, its server automatically recognises and stores your cookie ID and internet protocol address, the type of internet browser you are using, the address of the site that "referred" you to GPL websites and clickstream data.

In addition, GPL websites use cookies to track usage and statistics of its websites. This allows GPL to better understand its users and improve the layout and functionality of its websites. Most web browsers are set by default to accept cookies. This tracking is conducted in such a way as to ensure the anonymity of visitors to GPL websites. While the cookie may identify your computer (or part thereof), it should not identify you.

However, if you do not wish to receive any cookies you may set your browser to either prompt or refuse cookies. Please note that rejecting cookies may mean that not all of the functions on the GPL websites you visit will be available to you.

16. Links to other websites

Sometimes GPL websites contain links to third party websites for your convenience and information (eg: links to and from the websites of our partner networks, advertisers and other third parties). You should be aware that when you access a non-GPL website, GPL is not responsible for the privacy practices or policies of that site. GPL suggests that you review the privacy policy of each site you visit, especially if you intend to provide any personal information via the site.

17. How to Contact GPL

If you have any questions or comments about this Policy, if you wish to access any personal information GPL holds about you (for which you agree that we may elect to charge you reasonable fees for the time we have identifying and providing access to such information), if you do not wish to receive promotional emails, or if you wish to make a complaint about how GPL has handled personal information about you, please contact GPL's Privacy Officer at: [**info@golfpl.com.au**](mailto:info@golfpl.com.au)

18. Changes to this Privacy Policy

This Policy may change from time to time.