

NICKLAUS COMPANIES PRIVACY POLICY

Effective April 15, 2022

1. Introduction

Nicklaus Companies, LLC, along with its affiliated companies listed below (collectively, “**Nicklaus Companies**,” “**us**,” “**our**,” or “**we**”) is committed to respecting and protecting your privacy. We act in accordance with the requirements of the applicable privacy and data protection laws in the markets where we operate. This privacy policy (“**Privacy Policy**”) explains how we collect, process, and share Personal Data (defined below) pertaining to our customers and visitors to our website <http://www.nicklausdesign.com/> (the “**Website**”) (collectively, “**you**” and “**your**”). We also describe your rights and choices with respect to your Personal Data and other important information. Please read this Privacy Policy carefully before using our Services (defined below) and/or providing us with your Personal Data (defined below). You can print this Privacy Policy by clicking [here](#).

2. Scope of this Policy

This Privacy Policy applies to Personal Data collected through our “**Services**”, which include our websites that link to/post this Privacy Policy, including the Website, any subdomains, and mobile versions (collectively, the “**Sites**”).

Note that certain third parties may be able to identify you across sites and services using the information they process. However, any such processing not done at the direction of Nicklaus Companies is outside the scope of this Privacy Policy.

3. Who We Are

Nicklaus Companies is a member of the EB Golf Media, LLC and ECC Golf Holdings, Inc. family of companies, which includes 8AM GOLF, an integrated collection of brands with the shared mission of supporting and celebrating golfers and the golf industry. At the time of publication of this Privacy Policy, these include: Golf.com, Golf Magazine, 8AM Golf Holdings, LLC, True Spec Golf, GolfLogix, Inc., Miura Golf LLC, Chirp Golf LLC, Fairway Jockey, and Club Conex (together these will be referred to as the “**8AM Companies**”).

4. How to Contact Us

If you have any comments or questions about this Privacy Policy or our privacy practices, or to exercise your rights as described below, please contact our Data Privacy Team at:

Nicklaus Companies, LLC

3801 PGA Boulevard

Suite 565

Palm Beach Gardens, FL 33410

Data Rights Inquiries: Submit a Privacy Update Request form by visiting [HERE](#) or call 561-227-0300.

5. The Categories and Sources of Personal Data We Collect

“Personal Data” is data relating to identified or identifiable individuals and households (“**Personal Data**”). The Personal Data that we collect, and how we collect it, depends on how you interact with us. For example, if you are one of our customers, we may collect different types of data compared to data we may collect from one of our visitors.

A. Categories of Personal Data We Process

The categories of Personal Data we collect and use include (these are examples that may be subject to change):

<i>Contact Data</i>	Information such as your name, address, email address, telephone number, or account login details.
<i>Biographical Data</i>	Information such as your gender, date of birth, age and/or age range, or photograph or videos containing your image, occupation.
<i>Location Data</i>	Information about your general location, which we may obtain from your IP address, or from your social media tags/posts.
<i>Device/Network Data</i>	Information such as your browsing history, search history, and information regarding your interaction with our Sites or advertisements (e.g. IP Address, MAC Address, SSIDs or other device identifiers or persistent identifiers), online user ID, or device characteristics.
<i>Commercial Data</i>	Information such as your purchase history, details of products that we have sold to you, or product returns.
<i>Inference Data</i>	Personal Data used to create a profile about you reflecting your preferences (such as the products you seem to prefer based on use of our Sites or your purchases), as well as your characteristics, likes, interests, and other data or analytics provided about you by social media companies.
<i>Billing and Financial Data</i>	Information such as bank account details payment card information, including similar data defined in Cal. Civ Code § 1798.80(e).
<i>Audio/Visual Data</i>	Photos, videos, recordings and images collected from audio files and records, such as voice mails and the like.
<i>User Data</i>	Information such as unstructured/free-form data that may include any category of Personal Data, e.g. data that you give us in free text fields such as comment boxes, Personal Data you provide when you complete forms on our Services (such as if you apply to become an Independent Representative), or answers you provide when you participate in sweepstakes, contests, and surveys.

B. The Sources of Personal Data We Collect From You

We collect Personal Data from various sources, which vary depending on the context in which we process that Personal Data:

1. As a Customer:

<i>When you create a Nicklaus</i>	We may collect, or ask you to provide, your Contact Data, some Biographical Data, Location Data, Device/Network Data, Commercial Data, Billing and
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Companies account Financial Data, and other relevant information, as well as your communication preferences.

When you purchase Nicklaus Companies products or services, or return products We may collect, or ask you to provide, your Contact Data, Billing and Financial Data, Location Data, Commercial Data, and other relevant information.

When you register for the Nicklaus Companies newsletter or subscribe to the Website We may collect, or ask you to provide, your Contact Data and other relevant information, including User Data, as well as your communication preferences.

When you interact with Nicklaus Companies We may collect the Personal Data you provide to us at your own initiative, such as Contact Data and User Data, and any Personal Data we need to help resolve your query if, for example, you contact our customer service.

2. As a Website Visitor:

When you visit our Website or use our Apps We automatically collect, store, and use technical information about your equipment and interaction with our Sites (“**General Information**”) when you visit our Website or use our Apps. This General Information is sent from your computer or personal device to us using a variety of cookies and other technical means. Our Services do not respond to your browser’s do-not-track request. If you do not want information collected through the use of cookies, you can manage/deny cookies (and certain technologies) using your browser’s settings menu, as described below in “WHAT ARE YOUR RIGHTS AND CHOICES REGARDING YOUR PERSONAL DATA.”

C. Your Obligations

We expect that the Personal Data that you communicate to us are correct and that, if your Personal Data requires updating, you will promptly inform us.

D. Personal Data We Collect From Third Parties

In some circumstances, we may receive Personal Data about you from (i) individuals who provide to us your Personal Data (e.g., your family members and friends); or (ii) social media companies or other companies providing services to us.

Some of these third party sources may include publicly available sources of information. For example, we may receive Personal Data from social networks when you engage with our content, reference our Sites or Services, or grant us permission to access information from the social networks.

In addition, we may collect, either directly or through third party service providers, information that is publicly available on the Internet (e.g. from websites, blogs, social media).

We may combine any Personal Data about you that we receive from you, from other of 8AM Companies, and from third parties.

E. Children

Our Website is not intended for children under 18 years of age. We do not knowingly collect personal information from an individual under age 18. If You are under the age of 18, please do not submit any personal information through the Website. If You have reason to believe that We may have accidentally received personal information from an individual under age 18, please contact us immediately by submitting a Privacy Update Request form by visiting [HERE](#) or calling us at 561-227-0300.

6. How We Use Your Personal Data

We generally process your Personal Data: (i) to fulfill our obligations under a contract with you, or to take steps prior to entering into a contract with you, (ii) to comply with a legal obligation, (iii) when it is in our legitimate business interest to use your Personal Data, or (iv) based on your consent. Our legitimate interests include operating, evaluating and improving our Services and business; preventing and protecting us and others against fraud, unauthorized transactions, claims and other liabilities; and ensuring compliance with company policies and industry standards.

Our use of your Personal Data depends on who you are and how you interact with us. When you use our Services, we process your Personal Data in specific contexts and for certain specified purposes, as well as for our general business purposes and, in some cases, for commercial purposes.

Below is a list of the ways that we use your Personal Data and the reasons we rely on to do so.

A. How We Collect Personal Data

We collect and process Personal Data in several contexts when you use our Services, including:

i. When you make a purchase or other transaction

We generally process, Billing and Financial Data, Commercial Data, and Contact Data when you engage in a purchase and sale transaction, whether through our Services or over the phone. We process this Personal Data as necessary to perform or initiate a contract with you, process your order, and carry out fulfillment-related processing. In addition, we may also collect or create Device/Network Data and Inference Data. This data, together with other data we collect in this context is used in connection with legitimate business interests, such as ensuring the security of our Services, preventing fraud, providing information about our Services, contacting you about administrative matters, and responding to queries, complaints, or correspondence you send us. We may also use this Commercial Data, Contact Data, and Device/Network Data collected in this context for our Commercial Purposes.

ii. When you access or use our Services

When you use our Services, we automatically collect and process Device/Network Data. We use this data as necessary to initiate or fulfill your requests for certain features or functions through our Services, such as keeping you logged in, delivering pages, etc. In addition to Device/Network Data, we may also collect and process Contact Data, and Inference Data that we collect, create, and/or receive (including through the use of cookies and similar technologies). We typically use this data as necessary in connection with certain legitimate business interests, such as ensuring the security of our Sites and other technology systems, and analyzing the use of our Services, to help us make improvements.

Some Services may process Location Data (subject to your consent if required). We use this data, together with Inference Data and Device/Network Data, to provide directions and contextual information to you, and other features that require the use of location. Note, Location Data and Biographical Data may be required in order for you to use certain features of our Services. We may also process Contact Data, and User Data if you interact with or identify us on social media platforms.

We may also use Device/Network Data, Location Data, Inference Data and Contact Data collected in this context for Commercial Purposes.

iii. Cookies and other tracking technologies

We use some cookies and similar technologies on our Services. These technologies can be used to collect or create Device/Network Data, Contact Data, or Inference Data. Cookies and web beacons allow us to distinguish you from other users of our Sites, and some of these technologies can be used by us to identify you across platforms, devices, sites, and services.

You can find a list of the cookies we may deploy by visiting our [Cookie List page](#).

We may use cookies and similar technologies for the following purposes:

- for “essential” or “functional” purposes, such as to enable certain features of our Services (for example, to allow a customer to maintain a basket when they are shopping at an online store);
- for “analytics” purposes, such as to analyze the traffic to and usage of our Services (for example, how many people have looked at a page, how visitors move around the Sites, what website they visited prior to visiting our Sites, and use this information to understand user behaviors and improve the design and functionality of the Sites);
- for “retargeting” or similar advertising or commercial purposes:
- for social media integration e.g. via third-party social media cookies, or when you share information using a social media sharing button or “like” button on our Services, or when you link your account or engage with our content on or through a social networking website such as Facebook or Twitter; and
- to allow us to carry out retargeting (this includes, for example, when advertisements are presented to you for products or services which you have previously looked at on our Sites but have not purchased).

The use of these technologies by third parties may be subject to their own privacy policies.

We may also use your Device/Network Data, Inference Data and Contact Data collected in this context for **Business Purposes and Commercial Purposes**.

If you wish, you can manage/deny cookies (and certain technologies) using your browser’s settings menu. Some devices allow you to control this through your device settings. You can also manage your cookie settings by visiting the Privacy Preference Center by using the “Cookie Settings” button located [on the home page of the Website]. If you choose not to receive cookies at this time, websites may not function properly and certain services may not be provided.

iv. When you enter a contest or other promotion

We may collect and process Contact Data, Biographical Data, and User Data as necessary to process your request to enter a contest or promotion, notify you if you have won, deliver a prize or for related purposes. In addition, we may process this information to verify your identity for authentication and security purposes, and helping us to prevent fraud. If you win a contest/sweepstakes, we may publicly post some of your data on our Website (such as on a winners’ page). Unless prohibited by law, we may use this Contact Data, and User Data information for **Commercial Purposes**.

v. When you contact us or submit information to us

We may collect and process Biographical Data, Contact Data, and any Audio/Visual data or User Data you provide as necessary to address your request, fulfill the business purpose for which that information was provided, or for other related purposes, including but not limited to communicating with you on behalf of Nicklaus Companies or 8AM Companies. Additionally where you consent, if relevant to your request, or if otherwise permitted by law, we may send you marketing communications as described further below, and use this information for **Commercial Purposes**.

vi. Feedback and Surveys

We may process Contact Data, Inference Data, and User Data collected in connection with customer surveys or questionnaires. We generally process this Personal Data as necessary to respond to customer

requests/concerns, and create aggregate analytics regarding customer satisfaction. We may store and analyze feedback for our purposes, for example, to personalize the Services, and help recommend relevant offers or services. We may also use the Contact Data, Inference Data, and User Data collected in this context for Business Purposes and Commercial Purposes.

B. How We Process Personal Data for Business Purposes

We and our service providers process Personal Data we hold for numerous business purposes, depending on the context of collection, your rights and choices, and our legitimate business interests. For example, we generally process Personal Data in connection with:

i. Service Provision and Contractual Obligations

We process any Personal Data as is necessary to provide our Services, to provide you with the products you purchase, to authenticate users, and as otherwise necessary to fulfill our contractual obligations to you. Additionally, we may use Personal Data as necessary to audit compliance, and log or measure aspects of service delivery.

ii. Internal Processing and Service Improvement

We may use Personal Data for improving our Services, understanding how our Services are used, for customer service purposes, in connection with logs and metadata relating to service use, and for debugging, and similar purposes.

iii. Security and Incident Detection

We may process Personal Data to improve the security of our Services, to identify and prevent crime, and prevent fraud. We may analyze network traffic, device patterns and characteristics, maintain and analyze logs and process similar Personal Data in connection with our information security activities.

iv. Compliance Safety, and Public Interest

We may also process any Personal Data as necessary to comply with our legal obligations, such as where you exercise your rights under data protection law and make requests, for the establishment and defense of legal claims, or where we must comply with our legal obligations, lawful requests from government or law enforcement officials, and as may be required to meet national security or law enforcement requirements or prevent illegal activity. We may also process data to protect the vital interests of individuals, or on certain public interest grounds, each to the extent allowed under applicable law.

v. Aggregated data

We process Personal Data about our customers and users in order to identify trends, such as to create aggregated and anonymized data about buying and spending habits, use of our Services, and other similar information (“**Aggregated Data**”). We may pass Aggregated Data to certain third parties to give them a better understanding of our business and to improve our Services. Aggregated Data will not contain information from which you may be personally identified.

vi. Personalization

We may personalize or customize aspects of the Services based on your interactions with our content. This processing may involve the creation and use of Inference Data relating to your preferences.

C. How We Process Personal Data for Commercial Purposes

We and certain third parties process Personal Data we hold for certain commercial purposes, depending on the context of collection and your rights and choices, including:

i. Personalization & Consumer Profiles

In order to understand our customers’ preferences, and better recommend products and services to our prior customers, we may create a “**Consumer Profile**” by linking together and analyzing Personal Data collected in the various contexts as described in this Privacy Policy. We may also augment Consumer

Profiles with Personal Data that we create (such as Inference Data) or that we receive from third parties, and may include Personal Data such as products you have purchased.

We use Consumer Profiles for market research and in connection with the improvement of our Services. For example, we may analyze the Personal Data of people who have made a purchase for a particular item in the past and compare them with other people in our database. If we identify people in the database who have similar Personal Data to the previous customers, we may then target marketing via emails to the new people.

ii. Marketing Communications

We may send you marketing and promotional communications if you sign up for such communications or purchase products from us. We may also send you these communications if you register for our Services or for a promotion, or in connection with your communications with or submission of User Data to us. These communications may be personalized based on your user profile. We may also collect Device/Network Data and Contact Data so that we can determine whether you have opened an email or interacted with our communications, and we may generate Inference Data based on these interactions. We may also process this Personal Data for targeted advertising.

iii. Targeted Advertising

We may engage in targeted advertising. We generally use targeted advertising for the purpose of marketing our Services, to send marketing communications, including by creating custom marketing audiences on third-party websites.

7. Sharing and Transferring Your Personal Data

We may disclose your Personal Data to:

- the 8AM Companies and to other Nicklaus Companies entities;
- third party service providers, such as companies providing us shipping and delivery services, telecommunication services, payment services, and others;
- a third party in the event that Nicklaus Companies sells all or part of its assets to such third party or merges with or is acquired by the third party;
- any applicable regulatory, statutory, governmental or other relevant authorities, agencies or bodies and industry regulators, and any other person to whom Nicklaus Companies is compelled, required or permitted to do so by law, rules or regulations, legal process or litigation; or
- any person pursuant to any order of a court of competent jurisdiction or comparable legal process.

8. HOW LONG WE RETAIN YOUR PERSONAL DATA

We retain Personal Data for so long as it, in our discretion, is necessary to achieve the processing purposes described in this Privacy Policy, and in any event, for so long as is required by law. We will review retention periods periodically and may sometimes pseudonymize or anonymize data held for longer periods.

9. WHAT ARE YOUR RIGHTS AND CHOICES REGARDING YOUR PERSONAL DATA

You may have certain rights and choices regarding the Personal Data we process. Please note these rights may vary based on the country or state where you reside, and our obligations under applicable law.

i. Marketing Communications

You can withdraw your consent to receive marketing communications by clicking on the unsubscribe link in an email or by submitting a Privacy Update Request form by visiting [HERE](#).

ii. Withdrawing Your Consent/Opt-Out

Where we are processing your Personal Data based on your consent, you may change your mind and withdraw your consent at any time. The consequence of you withdrawing consent might be that we cannot perform certain Services for you.

iii. Location Preferences

You may control or limit Location Data that we collect through our Services by changing your preferences in your device's location services preferences menu.

iv. Do-Not-Track

Our Services do not respond to your browser's do-not-track request. If you do not want information collected through the use of cookies, you can manage/deny cookies (and certain technologies) using your browser's settings menu. You must opt out of third party services directly via the third party. For example, to opt-out of Google's analytic and marketing services, visit [Google Analytics Terms of Use](#), the [Google Privacy Policy](#), or [Google Analytics Opt-out](#).

v. Advertising

You may opt out or withdraw your consent to behavioral advertising. To opt out of Google's use of cookies, visit Google's Ads Settings, [here](#). If you wish to take steps to opt-out of tracking by certain online advertisers, you can visit the Digital Advertising Alliance's opt-out page at <http://www.aboutads.info/choices> or the Network Advertising Initiative at www.networkadvertising.org/optout_nonppii.asp. You can limit or opt out of our processing for behavioral advertising by submitting a Privacy Update Request form by visiting [HERE](#).

10. HOW WE PROTECT YOUR PERSONAL DATA

While we endeavor to protect our systems, sites, operations and information against unauthorized access, use, modification and disclosure, we cannot guarantee that any information, during transmission or while stored on our systems, will be absolutely safe from intrusion by others.

11. THIRD PARTY WEBSITES AND MOBILE APPLICATIONS

We are not responsible for the privacy policies, content or security of any linked third party websites or mobile applications. We recommend that you check the privacy and security policies of each and every website and mobile application that you visit.

12. CHANGES TO OUR PRIVACY POLICY

We reserve the right to change our Privacy Policy from time to time. Any such changes will be posted on this page. Your continued use of our Services constitutes your acceptance of any revised Privacy Policy.

13. ADDITIONAL RIGHTS: NEVADA

The Nevada Revised Statutes (NRS 603A.300 et seq.) permit a Nevada consumer to direct an operator of an Internet website or online service to refrain from making any sale of any covered information the operator has collected or will collect about that consumer. You may submit a request pursuant to this directive by submitting a Privacy Update Request form by visiting [HERE](#). We will provide further information about how we verify the authenticity of the request and your identity.

14. ADDITIONAL RIGHTS AND DISCLOSURES: CALIFORNIA

A. Your California Privacy Rights

Under the California Consumer Privacy Act (“**CCPA**”) and other California laws, California residents may have the following rights, subject to your submission of an appropriately verified request. While we do not “sell” your personal information in the traditional and common understanding of selling or providing information in exchange for monetary compensation, California has defined ‘sell’ much more broadly to mean sharing Your information to any third party under circumstances where We may derive some benefit. Accordingly, the following incorporate this much broader definition of the word “sell”:

<i>Right to Know</i>	You may request any of following, for the 12 month period preceding your request: (1) the categories of Personal Data we have collected about you, or that we have sold, or disclosed for a commercial purpose; (2) the categories of sources from which your Personal Data was collected; (3) the business or commercial purpose for which we collected or sold your Personal Data; (4) the categories of third parties to whom we have sold your Personal Data, or disclosed it for a business purpose; and (5) the specific pieces of Personal Data we have collected about you.
<i>Right to Delete</i>	You have the right to delete certain Personal Data that we hold about you, subject to exceptions under applicable law
<i>Right to Non-Discrimination</i>	You have the right to not to receive discriminatory treatment as a result of your exercise of rights conferred by the CCPA.
<i>Direct Marketing</i>	You may request a list of Personal Data we have disclosed about you to third parties for direct marketing purposes during the preceding calendar year.
<i>Opt-Out of Sale</i>	If we “sell” of data (as defined by applicable law), you may direct us to stop selling your data to third parties for commercial purposes. To exercise this right to opt out, you may call us at 561-227-0300. You may also submit a Privacy Update Request form by visiting HERE . We do not have actual knowledge that We sell the personal information of minors under 16 years of age.
<i>Minors’</i>	We do not intend to collect or maintain personal information of a minor under age 16, if you are a minor between the age of 13 and 16 you must expressly opt in to any sales of personal information (as defined under CCPA), and minors under the age of 13 must have a parent consent to sales of personal information (as defined under CCPA); all minors have the right to opt-out later at any time.
<i>Minors’ User Content</i>	Individuals under the age of 18 in California have the right to delete posts on our Services You may also submit a Privacy Update Request form by visiting HERE . We cannot guarantee comprehensive removal of content posted through the Services.

B. Submission of Requests

You may submit requests You may also submit a Privacy Update Request form by visiting [HERE](#).

C. Verification of Requests

All rights requests must be verified. We may require that you provide the email address we have on file for you (and verify that you can access that email account) as well as other data we have on file, in order to verify your identity. If an agent is submitting the request on your behalf, we reserve the right to validate the agent’s authority to act on your behalf.

D. Data Processing

i. Categories of Personal Data Disclosed for Business Purposes

For purposes of the CCPA, we may disclose to Service Providers for “business purposes” the following categories of Personal Data: Biographical Data, Contact Data, Location Data, Device/Network Data, Commercial Data, Inference Data, Billing and Financial Data, Audio/Visual Data, and User Data.

ii. Categories of Personal Data sold

For purposes of the CCPA, we do not “sell” your Personal Data.

If you are a California Resident, you have the right to opt out of data sales. If we have engaged in any sales of your Personal Information, you may do so submitting a Privacy Update Request form by visiting [HERE](#) or by calling us at 561-227-0300. You may be required to validate your identity to ensure your request is not fraudulent.

iii. Right to Know

Category of Data	Context	Category of Sources	Business Purposes	Commercial Purposes	Category of Recipients
Contact Data	<ul style="list-style-type: none"> When you make a purchase or other transaction When you access or use our Services Cookies and other tracking technologies When you enter a contest or other promotion When you contact us or submit information to us Feedback and surveys 	From you; individuals who provide to us your Contact Data; social media companies, or other companies providing services to us; third party service providers	Service Provision and Contractual Obligations; Internal Processing and Service Improvement; Security and Incident Detection; Compliance, health, safety, public interest; Aggregated data; Personalization	Personalization & Consumer Profiles; Marketing Communications; Targeted advertising	Nicklaus Companies and other Nicklaus Companies entities; Third party service providers; A third party in the event that Nicklaus Companies sells all or part of its assets to such third party or merges with or is acquired by the third party any person to whom Nicklaus Companies is

					compelled, required, or permitted to do so by law, rules or regulations, legal process or litigation; any person pursuant to any order of a court of competent jurisdiction or comparable legal process.
Biographical Data	<ul style="list-style-type: none"> • When you access or use our Services • When you enter a contest or other promotion • When you contact us or submit information to us 	From you; individuals who provide to us your Contact Data; social media companies, or other companies providing services to us; third party service providers	Service Provision and Contractual Obligations; Internal Processing and Service Improvement; Security and Incident Detection; Compliance, health, safety, public interest; Aggregated data; Personalization	Personalization & Consumer Profiles; Marketing Communications; Targeted advertising	Nicklaus Companies and other Nicklaus Companies entities; Third party service providers; A third party in the event that Nicklaus Companies sells all or part of its assets to such third party or merges with or is acquired by the third party any person to whom Nicklaus Companies is compelled, required, or permitted to do so by

					law, rules or regulations, legal process or litigation; any person pursuant to any order of a court of competent jurisdiction or comparable legal process.
Location Data	<ul style="list-style-type: none"> When you access or use our Services 	From you; individuals who provide to us your Contact Data; social media companies, or other companies providing services to us; third party service providers	Service Provision and Contractual Obligations; Internal Processing and Service Improvement; Security and Incident Detection; Compliance, health, safety, public interest; Aggregated data; Personalization	Personalization & Consumer Profiles; Marketing Communications; Targeted advertising	Nicklaus Companies and other Nicklaus Companies entities; Third party service providers; A third party in the event that Nicklaus Companies sells all or part of its assets to such third party or merges with or is acquired by the third party any person to whom Nicklaus Companies is compelled, required, or permitted to do so by law, rules or regulations, legal

					process or litigation; any person pursuant to any order of a court of competent jurisdiction or comparable legal process.
Device/ Network Data	<ul style="list-style-type: none"> • When you make a purchase or other transaction • When you access or use our Services • Cookies and other tracking technologies 	From you; individuals who provide to us your Contact Data; social media companies, or other companies providing services to us; third party service providers	Service Provision and Contractual Obligations; Internal Processing and Service Improvement; Security and Incident Detection; Compliance, health, safety, public interest; Aggregated data; Personalization	Personalization & Consumer Profiles; Marketing Communications; Targeted advertising	Nicklaus Companies and other Nicklaus Companies entities; Third party service providers; A third party in the event that Nicklaus Companies sells all or part of its assets to such third party or merges with or is acquired by the third party any person to whom Nicklaus Companies is compelled, required, or permitted to do so by law, rules or regulations, legal process or litigation; any person pursuant to

					any order of a court of competent jurisdiction or comparable legal process.
Commercial Data	<ul style="list-style-type: none"> When you make a purchase or other transaction 	From you; individuals who provide to us your Contact Data; social media companies, data aggregators, or other companies providing services to us; third party service providers	Service Provision and Contractual Obligations; Internal Processing and Service Improvement; Security and Incident Detection; Compliance, health, safety, public interest; Aggregated data; Personalization	Personalization & Consumer Profiles; Marketing Communications; Targeted advertising	Nicklaus Companies and other Nicklaus Companies entities; Third party service providers; A third party in the event that Nicklaus Companies sells all or part of its assets to such third party or merges with or is acquired by the third party any person to whom Nicklaus Companies is compelled, required, or permitted to do so by law, rules or regulations, legal process or litigation; any person pursuant to any order of a court of competent

					jurisdiction or comparable legal process.
Inference Data	<ul style="list-style-type: none"> • When you make a purchase or other transaction • When you access or use our Services • Cookies and other tracking technologies • Feedback and surveys 	From you; individuals who provide to us your Contact Data; social media companies, or other companies providing services to us; third party service providers	Service Provision and Contractual Obligations; Internal Processing and Service Improvement; Security and Incident Detection; Compliance, health, safety, public interest; Aggregated data; Personalization	Personalization & Consumer Profiles; Marketing Communications; Targeted advertising	Nicklaus Companies and other Nicklaus Companies entities; Third party service providers; A third party in the event that Nicklaus Companies sells all or part of its assets to such third party or merges with or is acquired by the third party any person to whom Nicklaus Companies is compelled, required, or permitted to do so by law, rules or regulations, legal process or litigation; any person pursuant to any order of a court of competent jurisdiction or comparable

					legal process.
Billing and Financial Data	<ul style="list-style-type: none"> When you make a purchase or other transaction 	From you; individuals who provide to us your Contact Data; social media companies, or other companies providing services to us; third party service providers	Service Provision and Contractual Obligations; Internal Processing and Service Improvement; Security and Incident Detection; Compliance, health, safety, public interest; Aggregated data; Personalization	Personalization & Consumer Profiles; Marketing Communications; Targeted advertising	Nicklaus Companies and other Nicklaus Companies entities; Third party service providers; A third party in the event that Nicklaus Companies sells all or part of its assets to such third party or merges with or is acquired by the third party any person to whom Nicklaus Companies is compelled, required, or permitted to do so by law, rules or regulations, legal process or litigation; any person pursuant to any order of a court of competent jurisdiction or comparable legal process.

Audio/Visual Data	<ul style="list-style-type: none"> When you contact us or submit information to us 	From you; individuals who provide to us your Contact Data; social media companies, or other companies providing services to us; third party service providers	Service Provision and Contractual Obligations; Internal Processing and Service Improvement; Security and Incident Detection; Compliance, health, safety, public interest; Aggregated data; Personalization	Personalization & Consumer Profiles; Marketing Communications; Targeted advertising	Nicklaus Companies and other Nicklaus Companies entities; Third party service providers; A third party in the event that Nicklaus Companies sells all or part of its assets to such third party or merges with or is acquired by the third party any person to whom Nicklaus Companies is compelled, required, or permitted to do so by law, rules or regulations, legal process or litigation; any person pursuant to any order of a court of competent jurisdiction or comparable legal process.
User Data	<ul style="list-style-type: none"> When you access or use our Services 	From you; individuals who provide	Service Provision and Contractual	Personalization & Consumer Profiles;	Nicklaus Companies and other

	<ul style="list-style-type: none"> • When you enter a contest or other promotion • When you contact us or submit information to us • Feedback and surveys 	<p>to us your Contact Data; social media companies, or other companies providing services to us; third party service providers</p>	<p>Obligations; Internal Processing and Service Improvement; Security and Incident Detection; Compliance, health, safety, public interest; Aggregated data; Personalization</p>	<p>Marketing Communications; Targeted advertising</p>	<p>Nicklaus Companies entities; Third party service providers; A third party in the event that Nicklaus Companies sells all or part of its assets to such third party or merges with or is acquired by the third party any person to whom Nicklaus Companies is compelled, required, or permitted to do so by law, rules or regulations, legal process or litigation; any person pursuant to any order of a court of competent jurisdiction or comparable legal process.</p>
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