

#### Rose Golf Ltd Privacy Policy

#### Introduction

Rose Golf Ltd (**we, us, our**) takes your privacy seriously and we are committed to protecting your personal information. The address for Rose Golf Ltd (company registration number 13275654) is at Oriel House, 26 The Quadrant, Richmond, TW9 1DL.

This Privacy Notice applies to personal data (i.e. information concerning any living person (**Data Subject**)) held by us as data controllers that is not already in the public domain. It explains what personal information we collect, how we collect and use that personal information, with whom we will share it, why and in what circumstances.

Rose Golf Ltd is pleased to provide the following Privacy Notice which covers the Rose Ladies Open ticketing service.

The third party websites used for the ticket registration service (**Platform**) may have their own privacy and cookie notices which are different to this Privacy Notice. Our Privacy Notice does not apply to your use of any such Platform and you should therefore make sure that you are comfortable with their privacy notices.

## **Personal Data**

Rose Golf Ltd uses the information collected from you to provide such organisational services as you request from us. In using our services you consent to Rose Golf Ltd maintaining a dialogue with you until you either opt out (which you can do at any stage) or we decide to desist from promoting our services.

The type of information that we may collect will differ depending on the type of service we are offering or the request you make of us. Such information may include your:

- name
- title
- contact details (including email address and/or telephone/mobile number)
- booking reference

For its customers, Rose Golf Ltd will only collect such customer information as is necessary to provide you with and keep you informed about its services.

#### Disclosure

We do not broker or pass on information gained from your engagement with us without your specific consent to do so. Notwithstanding the foregoing, we may disclose your personal information to meet our legal obligations; to comply with applicable regulations or a valid governmental request or court order; in order to enforce or apply the terms of use of any of the Platforms or other agreements; to protect the rights, property or safety of our partners, customers and/or others.

#### Who will we share your data with?

Your personal data may be shared with the Platform, who will process it on our behalf to facilitate the particular purposes for which they are using your data.

We ensure that each Platform is committed to GDPR compliance and adequate data security standards and to only using your data as outlined in their privacy policy (and not for other purposes).

Your personal data may also be shared with government authorities and/or law enforcement officials and/or pursuant to a court order if mandated by law or if required for the legal protection of our legitimate interests in compliance with



applicable laws. We may also disclose your personal data as necessary to help us meet our legal and contractual obligations, to enforce our terms of use and to protect the rights, property and/or safety of Rose Golf Ltd, our partners customers and/or others and to protect the integrity of the sport of golf.

We will only share your personal data with a third party for the purpose of them directly marketing to you where you have consented to such data sharing.

In addition, where we process your personal data in your capacity as a contractor, supplier, promoter, venue or partner (or as an employee, worker or other representative of any of the aforementioned), we may share your personal data with third parties for operational purposes in connection with the role performed by such contractor, supplier, promoter, venue or partner. For example, if, as a representative of a promoter, your contact details are provided to us, we may pass these on to:

- third party service providers who will be providing services in connection with the tournament(s) for the purpose of facilitating the provision of such services; and/or
- players (and their managers) who will be attending such tournament(s) in order to facilitate communication with you.

## Legal Basis for Processing Personal Data

We will only collect, process, use, share and store your personal information where we are satisfied that we have an appropriate legal basis for doing so. This may be because:

- we need to use your personal information to take steps to enter into a contract with you or to meet our contractual obligations to you
- we need to use your personal information to respond to marketing or other enquiries from you
- we need to use your personal information to pursue our legitimate interests as a commercial organisation
- we have your consent to using your personal information for a particular activity (for example, where you have consented to us sharing with you marketing or promotional communications from Rose Golf Ltd and/or its official partners, sponsors, suppliers or licensees which we think may be of interest).

Our legitimate interests as a commercial organisation include the administration and promotion of the Rose Ladies Open and the sport of golf, and the fulfilling of services to its fans and our customers.

#### Consent

Where we are relying on your consent, you may withdraw your consent to the processing of your personal information at any time by contacting us (see the 'How to Contact Us' section below).

#### **Retention Policy**

Rose Golf Ltd will only retain your personal information for as long as is reasonably necessary for the purposes for which it was collected and in line with our data retention policy. For example, we will normally keep contractual information for a period of ten years after the expiry of any such contract so that, if we need to establish, exercise or defend our legal interests, we may deal with any dispute or concerns that may arise.

#### Your Rights as a Data Subject

At any point whilst Rose Golf Ltd holds your personal information, you have a number of rights available to you, including the following:

• Right of access – you have the right to access a copy of the information that we hold about you and to obtain information about how we process it



- Right of rectification you have a right to request that we correct data that we hold about you if it is inaccurate or incomplete
- Right to be forgotten in certain circumstances, you can ask for the data we hold about you to be erased from our records
- Right to restriction of processing where certain conditions apply you have a right to request that we restrict the processing of your information
- Right of portability you have the right to have the data we hold about you provided to you in an electronic format and/or to request that it is transferred to another organisation
- Right to object you have the right to object to certain types of processing such as direct marketing
- Right to object to automated processing, including profiling you also have the right not to be subject to a decision based solely on automated processing (including profiling) which adversely affects your legal rights

You can exercise these rights in the first instance by contacting us (see 'How to Contact Us' section below). Should you wish to do so, we will require you to provide additional information to confirm your identity as follows:

One piece of photographic identification (e.g. passport, other national identity card or photocard driving licence) and

One proof of address (e.g. utility bill dated within the last 3 months)

We will advise you promptly if we require further information in order to fulfil your request. Please be aware that these rights are, in the most part, not absolute and are subject to exceptions; for example, if we have a necessary and lawful basis on which to continue processing your personal data, we may refuse your request to delete it,

Further to the rights set out above, you can request the following information from us:

- The identity and the contact details of the person or organisation that has determined how and why to process your data
- Contact details of our Data Protection Officer
- The purpose of the processing as well as the legal basis for processing
- If the processing is based on the legitimate interests of Rose Golf Ltd or a third party such as one of its clients, information about those interests
- The categories of personal data collected, stored and processed
- Recipient(s) or categories of recipients that your data is/will be disclosed/transferred to
- How long your data will be stored for
- Details of your rights to correct or erase your personal data and your rights to restrict or object to the processing of your data
- Information about your right to withdraw consent at any time
- How to lodge a complaint with the data protection regulator in the country where you live
- The source of personal data if it was not collected directly from you
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing

## Updates

We may amend this Privacy Notice from time to time to keep it up to date with legal requirements, best practice and/or the way we operate our business. If we decide to change our Privacy Notice we will place any updates on any relevant Platforms.

Please therefore check this page and the privacy sections of any relevant Platforms periodically in order to view the latest version of our Privacy Notice; however, any substantial changes affecting how your personal data will be notified to you.



# How to Contact Us

The primary point of contact for all issues arising from this Privacy Notice is <u>sonia@rosegolf.co.uk</u>

Or by post at:

# ROSE GOLF LIMITED

Oriel House, 26 The Quadrant, Richmond, TW9 1DL

In the event that you have any questions, concerns or wish to make a complaint about how your personal data is being processed or regarding our compliance with this Privacy Notice, we would encourage you to contact us as outlined above. We will investigate and attempt to resolve complaints and disputes as quickly as possible.