## WEBSITE PRIVACY POLICY

Effective Date: June 2018

The Stonewall Links Limited Partnership ("Stonewall," "we," "us" or "our") recognizes the importance of, and we respect, your privacy. Stonewall wants you to make the most of this website and to feel confident while doing so. This Privacy Policy explains our practices around the information collection, use and disclosure practices for this website: <a href="http://www.stonewalllinks.com">http://www.stonewalllinks.com</a> (the "Website"). This policy does not address information we obtain from any other source, including information provided to us in the course of our operations, e-mail exchanges directly with our staff, and offline through events such as tournaments and other golf events.

Scope; Links to Other Sites. This Privacy Policy applies only to the information collected on the Website. The Website may contain links and widgets related to third-party websites such as social networks ("Third Party Site") with which we have no affiliation. A link to any Third Party Site does not mean that we endorse it or the quality or accuracy of information presented on it. If you decide to visit a Third Party Site, you are subject to its privacy policy and practices and not this Privacy Policy. We encourage you to carefully review the legal and privacy notices of all other digital sites that you visit.

What Information Does Stonewall Collect About Me, and What Does Stonewall Do With It? Stonewall through the Website collects both personally identifiable information – that is, information that identifies you or can be used on its own or with other information to identify, locate or contact you – as well as non-personally identifiable information about how you use the Website.

Information You Choose to Provide. Stonewall collects and stores information you choose to provide through the Website. You may, for example use e-mail links on the Website to communicate with Stonewall or anyone affiliated with Stonewall and provide us with personally identifiable information, however, you will not remain anonymous. You may also sign up on the Website to receive e-mail alerts and newsletters. Because it is not possible to anticipate every conceivable context in which such information might be provided to us via e-mail, Stonewall cannot provide any assurance that personally identifiable information you choose to provide to us via e-mail will be maintained as private.

Stonewall will use any information you provide to deliver the information you requested, as well as surveys, invitations, announcements and other information Stonewall believes may interest you. Stonewall also uses this information, along with similar information from other visitors to the Website, to evaluate and improve the effectiveness of its Website and the information it contains.

Information We Collect Automatically. Stonewall may now or in the future use tools, including third-party analytical software, to collect automatically certain data about the computer or other device you use to reach our Website such as: (i) device properties including, but not limited to, unique or other device identifiers; (ii) device operating system and software; (iii) IP address and Internet service provider; (iv) mobile phone carrier; (v) geographical data such as country or region; and (vi) other similar data. Stonewall also may use server log analysis tools to gather and analyze information regarding the Website's usage, such as the number of hits received, the number of unique visitors, the most/least visited pages, errors experienced by users, browsers and platforms used to connect to the Website, the number of times a user or the computers within a given network visited the Website, the date and time you visited the Website, the pages of the Website that you visited and the order in which you accessed such pages, and the websites you visited before or after you visit our Website.

This information may be collected via several technologies, including cookies, web beacons, clear GIFs and other means. All of this information belongs to Stonewall, and Stonewall uses it to improve effectiveness, content, layout and/or operation of our Website. You can remove certain cookies by following the directions in your Internet browser's "help" file. If you disable cookies, your ability to use areas of the Website may be limited.

How Information is Used. We may use the information we collect for any of the following purposes:

- to provide the Website to our customers and to you and to improve the Website;
- to operate, improve, and personalize the products and services we offer, and to give each user a more consistent and personalized experience when interacting with us;
- to provide you with information about products and services that we think may be of interest to you;
- for customer service, security, to detect fraud or illegal activities, and for archival and backup purposes in connection with the provision of the Website;
- for research and analysis purposes;
- to communicate with users; and
- to enforce our Terms of Use or other applicable policies.

Who Has Access to My Information? Stonewall does not and will not share your personally identifiable information except as set forth in this Privacy Policy. Stonewall does not share your personally identifiable information with third parties for their own marketing purposes. Your information is accessible to Stonewall personnel. In addition, Stonewall may share information with the following third parties:

- web designers, hosting service providers and others helping Stonewall implement, maintain and operate the Website;
- o vendors monitoring the Website and its operation on Stonewall's behalf;
- vendors assisting or cooperating in providing goods purchased by you, or providing Stonewall with other services;
- sponsors or co-sponsors of events or programs in which Stonewall is participating;
- o successor entities to Stonewall by virtue of a merger, acquisition or similar transaction; and
- o law enforcement and other government authorities such as legislatures, courts, agencies and litigants if we reasonably believe that such action is necessary to: (a) comply with the law and the reasonable requests of governmental authorities; (b) comply with legal process; (c) respond to requests from public or government authorities, including public or government authorities outside your country of residence; (d) protect the security or integrity of the Website or Stonewall's information systems; and/or (e) exercise or protect our rights, privacy, safety or those of our affiliates, partners, members, or others.

How Does Stonewall Protect My Information? Stonewall follows generally accepted security practices and procedures designed to protect your personally identifiable information from unauthorized access, use and disclosure and requests that its authorized service providers implement and maintain such security practices and procedures as well. Nevertheless, please be aware that Internet transmissions and information storage systems are never completely private or secure.

**How Long Does Stonewall Keep My Information?** Stonewall stores your information for as long as it believes the information to be useful in carrying out the business purposes for which it was collected.

What Are the Privacy Policies of Third-Party Websites to Which Stonewall's Website Links? Stonewall provides links to third-party websites that it does not control. Stonewall urges you to review the privacy policies posted on these third-party websites at the time you first visit such sites. Stonewall undertakes no obligation to review or ensure enforcement or compliance with the privacy policy of any website to which it links.

What About Children's Privacy? Stonewall does not knowingly collect personally identifiable information from any children under age 16. No parts of the Website are directed to or designed to attract anyone under the age of 16.

Is Data Storage and Processing Conducted in the United States? Regardless of where you are located, Stonewall's Website collects information and processes and stores that information in databases located in the United States. If you are visiting the Website from a country outside the United States, you should be aware that you may transfer personally identifiable information about yourself to the United States, and that the data protection laws of the United States may not be as comprehensive as those in your own country. By visiting the Website and submitting any personally identifiable information you consent to the transfer of such personally identifiable information to the United States.

## **Additional Terms for EU Visitors**

The data controller for this Website is Stonewall. Stonewall processes personally identifiable information it collects through the Website for Stonewall's legitimate business purposes, for example to fulfill any requests you may make in connection with your submission of personally identifiable information, to monitor and improve the quality of the Website, and to protect and defend our rights, property or safety or that of our partners, members and other users of the Website. You may have the right to access and/or obtain a copy of your personally identifiable information, correct inaccuracies in your personally identifiable information, request the erasure of your personally identifiable information and restrict the processing of your personally identifiable information. For more information about how you can access, rectify and erase your personally identifiable information or make any other requests relating to your personally identifiable information or to contact Stonewall, please see the Section of this Privacy Policy entitled, "What If I Have Questions or Comments About this Privacy Policy?," below. In addition, you have the right to lodge a complaint with a supervisory data protection authority.

Does the Website Honor Do Not Track Requests? The Website does not support Do Not Track at this time. Do Not Track (DNT) is a privacy preference you can set in your web browser to indicate that you do not want certain information about your webpage visits collected across websites when you have not interacted with that service on the page. For all the details, including how to turn on Do Not Track, visit donottrack.us.

Can Stonewall Revise this Privacy Policy? Due to the rapidly evolving technologies on the Internet and changes in its business requirements, Stonewall occasionally may update this Privacy Policy. All revisions will be posted to Stonewall's Website. Stonewall urges you to review its Privacy Policy frequently.

What If I Have Questions or Comments About this Privacy Policy? Stonewall welcomes questions and comments about this policy. Questions or comments about this Privacy Policy should be directed to pmauer@Stonewalllinks.com. In addition, if you wish to change the type of information we send you, please let us know by e-mailing Jenniferk@Stonewalllinks.com. Similarly, if you do not receive acknowledgement of your inquiry or your inquiry has not been satisfactorily addressed, you should telephone our general manager at (610) 286-3030.