

## HGC Brunswick Plantation, LLC Privacy Policy Notice

*Last Updated:* December 15, 2024

HGC Brunswick Plantation, LLC and its affiliates and subsidiaries (“**Heritage**,” “**we**,” “**us**,” or “**our**”) respect your privacy. This Privacy Notice (“**Notice**”) describes the processing of Personal Information (defined below) that is used, collected, or disclosed while providing our products or services to you (“**Services**”) and on the websites, applications, and online platforms that link to this Notice (collectively, “**Sites**”). It also describes rights regarding your Personal Information you may have under applicable laws. Please read this Notice carefully to understand our policies and practices regarding your Personal Information and how we will treat it. To access this Notice in an alternative downloadable format, please click [here](#).

### Personal Information We Collect

We collect several categories of Personal Information from and about users of our Sites and Services. “**Personal Information**” means information that uniquely identifies, relates to, describes, or is reasonably capable of being associated with or linked to you. The categories of Personal Information we collect may include:

- *Contact Information* – If you register to use our Sites, book a tee time, make a reservation, submit an inquiry, or otherwise provide information on or through our Sites or Services, we may collect your contact information including your name, mailing address, email address, and phone number.
- *Usage Information* – When you use our Sites, we may automatically record information, including your Internet Protocol address (IP Address), geolocation of your device, browser type, referring URLs (e.g., the website you visited before coming to our Sites), domain names associated with your internet service provider, and any other information regarding your interaction with our Sites.
- *Communication Information* – We may collect Personal Information contained within your communications with us via email, social media, telephone, or otherwise, and in certain cases we may use third-party service providers to do so. Where permitted by applicable law, we may collect and maintain records of calls and chats with our agents, representatives, or employees via message, chat, post, or similar functionality.
- *Financial Information* – If you use our Services, we may collect financial information such as credit card details via our third-party payment processor to facilitate online payments.

### How We Collect Personal Information

- *Directly From You* – We collect Personal Information that you provide to us directly, for example, if you choose to register as a user of our Sites, book a tee time, make a reservation, contact us, request information from us, sign up to receive updates, or otherwise utilize our Sites or Services.
- *From Third Parties* – We may collect Personal Information from third parties, including but not limited to business partners, advertising networks, social networks, data analytics providers, mobile device providers, Internet or mobile service providers, recruiters and job application portals, and background check providers.

- *Through Online Tracking Technologies* – We use cookies and similar technologies to collect Personal Information automatically as you navigate our Sites. For additional information regarding our use of these technologies, see the *Cookies and Tracking Technologies* section below.

## **How We Use Personal Information**

To the extent permitted by applicable law, we use Personal Information:

- *To provide and personalize our Sites and Services*, such as processing or fulfilling orders and transactions, providing and personalizing our Services, processing payments, providing customer service, maintaining or servicing accounts, verifying customer information, creating and maintaining business records, verifying eligibility, and undertaking or providing similar services.
- *To optimize, improve, and maintain our Services*, including understanding how users interact with our Services, gauging user interest in certain Services or Sites' functionality, and troubleshooting problems.
- *For internal research and development*, such as testing, verifying, and improving the quality of our Services or developing new ones.
- *For marketing and advertising*, including using your information to send you messages, notices, newsletters, surveys, promotions, or event invitations about our own or third parties' goods and services that may be of interest to you. You can also unsubscribe from any marketing emails or text messages that we may send you by following the instructions included in the email or text correspondence or emailing us at [privacy@heritagegolfgroup.com](mailto:privacy@heritagegolfgroup.com).
- *For communicating with you*, such as responding to your questions and comments or notifying you of changes to our Sites or Services.
- *For legal, security, or safety reasons*, such as protecting our and our users' safety, property, or rights; complying with legal requirements; enforcing our terms, conditions, and policies; detecting, preventing, and responding to security incidents; and protecting against malicious, deceptive, fraudulent, or illegal activity.
- *As part of a corporate transaction*, such as in connection with the sale of part or all of our assets or business, the acquisition of part or all of another business or another business' assets, or another corporate transaction, including bankruptcy.
- *To fulfill any other purpose for which you provide it*, including purposes described when you provide the information or give your consent.

## **How We Disclose Personal Information**

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose your Personal Information in the following circumstances:

- *Employees and Other Personnel* – We may share Personal Information with our employees and personnel (such as contractors) who have a need to know the information for our business purposes.
- *Affiliates and Subsidiaries* – We may share Personal Information within our family of companies for their and our business and marketing purposes, including providing you with information about the Services we think may be of interest to you.
- *Service Providers* – We disclose your Personal Information with the service providers that we use to support our business, including but not limited to, data analytics providers, website hosting providers, and other technology providers. If you are applying for a job with us, this may include service providers such as background check providers and human resource providers.
- *Business Partners* – We may disclose Personal Information with trusted business partners. For example, we may disclose your Personal Information with a company whose products or services we think may be of interest to you or who we co-sponsor a promotion or service with.
- *Legal Obligation or Safety Reasons* – We may disclose Personal Information to a third party when we have a good faith belief that such disclosure of Personal Information is reasonably necessary to (a) satisfy or comply with any requirement of law, regulation, legal process, or enforceable governmental request, (b) enforce or investigate a potential violation of any agreement you have with us, (c) detect, prevent, or otherwise respond to fraud, security or technical concerns, (d) support auditing and compliance functions, or (e) protect the rights, property, or safety of Heritage its employees and clients, or the public against harm.
- *Merger or Change of Control* – We may disclose Personal Information to third parties as necessary if we are involved in a merger, acquisition, or any other transaction involving a change of control in our business, including but not limited to, a bankruptcy or similar proceeding. Where legally required, we will give you notice prior to such disclosure.
- *Other* – We may disclose Personal Information to third parties when explicitly requested by or consented to by you, or for the purposes for which you disclosed the Personal Information to us as indicated at the time and point of the disclosure (or as was obvious at the time and point of disclosure).

## **Cookies and Other Tracking Technologies**

We and our service providers may use cookies and similar technologies to collect usage and browser information about how you use our Sites. The technologies we use for this automatic data collection may include cookies and web beacons that permit us to verify system and server integrity and generate statistics around the popularity of certain content. We process the information collected through such technologies, which may include or be combined with Personal Information, to help operate certain features of our Sites, to enhance your experience through personalization, and to help us better understand the features of our Sites that you and other users are most interested in.

*Website Delivery and Appearance* – We may use third-party providers to enable certain customer interaction opportunities, content delivery (like audio or video), or other service capabilities. Examples include, but are not limited to, the following functionality:

*Website Analytics and Session Replay* – We use analytics and session replay services, that use cookies and other technologies that collect your Personal Information, to assist us with analyzing our Sites traffic and

site usage to optimize, maintain, and secure our Sites and inform subsequent business decisions (including, e.g., advertising). These include, but are not limited to, the following third-party services:

- **Google Analytics:** To learn more about how Google uses data, visit [Google's Privacy Policy](#) and Google's page on "[How Google uses data from sites or apps that use our services.](#)" You may download the [Google Analytics Opt-out Browser Add-on](#) for each web browser you use, but this does not prevent the use of other analytics tools. To learn more about Google Analytics cookies, visit [Google Analytics Cookie Usage on Websites](#).

*Cookie Choices* – To manage your preferences with respect to these technologies, you can:

- Customize your browser settings to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable certain cookies, please note that some parts of our Sites may not function properly. These settings may be lost and require reconfiguration if you delete your cookies.
- Although we do not engage in targeted advertising, block the collection and use of your information by online platforms and ad tech companies for the purpose of serving interest-based advertising by visiting the opt out pages of the self-regulatory programs of which those companies are members: [National Advertising Initiative](#) and [Digital Advertising Alliance](#). Please note that even if you opt out of interest-based advertising, you may still see "contextual" ads which are based on the context of what you are looking at on the websites and pages you visit.
- Review and execute any provider-specific instructions to customize your preferences or opt-out of certain processing, by third-party service providers. For example, to opt out of this type of advertising by Google, customize your ad preferences, or limit Google's collection or use of your data, visit [Google's Safety Center](#) and [Google's Ad Settings](#) and follow [Google's personalized ad opt-out instructions](#). To opt out of advertising under Adobe Audience Manager, please follow [Adobe's Experience Cloud opt-out instructions](#). Meta also offers an [Ad Preferences center](#) to customize your settings, as well as a [Privacy Policy](#) with additional information on how you can exercise your rights.

## **How Long We Keep Your Personal Information**

We retain your information for as long as needed: (i) to conduct business with you; (ii) fulfill the purposes outlined in this Notice; and (iii) to comply with our legal obligations, resolve disputes, and enforce any agreements.

Criteria we will use to determine how long to retain your Personal Information include the nature and length of our business relationship with you; our legal rights, obligations, and retention requirements; and if we have an ongoing business purpose for retaining your Personal Information, such as communicating with you about ongoing or prospective Services you requested.

## **Links to Third-Party Websites**

We are not responsible for the practices employed by any websites or services linked to or from our Sites, including the information or content contained within them. We encourage you to investigate and ask questions before disclosing Personal Information to third parties, since any Personal Information disclosed will be handled in accordance with the applicable third party's privacy policy.

In some cases, we offer links to social media platforms (like Facebook, Instagram, Pinterest, X (formerly known as Twitter) and YouTube that enable you to easily connect with us or share information on social media. Any content you post via these social media pages is subject to the Terms of Use and Privacy Policies for those platforms. For more information about how YouTube collects and processes Personal Information, please see [Google's Privacy Policy](#).

## **International Use and Cross-Border Data Transfers**

If you are visiting our Sites from outside of the United States, please note that our Sites is hosted in the United States. Where permitted by applicable law, we may transfer the personal data we collect about you to the United States and other jurisdictions that may not be deemed to provide the same level of data protection as your home country, as necessary for the purposes set out in this Notice.

## **How We Protect Personal Information**

We have implemented commercially reasonable measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration, and disclosure. Unfortunately, the transmission of information via the internet is not completely secure. despite these efforts to store Personal Information in a secure environment, we cannot guarantee the security of Personal Information during its transmission or its storage on our systems.

## **Exercising Your Privacy Rights**

Depending on where you live, you may have the following rights with respect to your Personal Information under applicable data protection laws:

- *Access* – The right to request access to and obtain a copy of any Personal Information we may have about you.
- *Deletion* – The right to delete your Personal Information that we have collected or obtained, subject to certain exceptions.
- *Correction* – The right to request that we correct any inaccuracies in your Personal Information, subject to certain exceptions.
- *Opt Out of Certain Processing* – The right to: (a) opt out of the processing of your Personal Information for purposes of targeted advertising, (b) opt out of the sale or sharing of your Personal Information; (c) limit the use of your sensitive Personal Information (if applicable); and (d) opt out of profiling in furtherance of decisions that produce legal or similarly significant effects. While we do not sell Personal Information in exchange for monetary consideration or engage in targeted advertising, we may share Personal Information for other benefits that could be deemed a “sale” or “sharing” under various data protection laws.
- *Objection/Restriction of Processing* – The right to object or restrict us from processing your Personal Information in certain circumstances.
- *Withdraw Consent* – The right to withdraw your consent where we are relying on your consent to process your Personal Information.

- *Automated Decision-Making* – The right to know when you are subject to automated decision-making, the Personal Information used to render the decision, the principal factors and parameters involved in the decision, and human review or correction of the decision (or its underlying data, where appropriate). You may also have the right to consent or opt out of this automated decision-making, depending on your location.
- *Lodge a Complaint* – The right to lodge a complaint with a supervisory authority or other regulatory agency if you believe we have violated any of the rights afforded to you under applicable data protection laws. We encourage you to first reach out to us so we have an opportunity to address your concerns directly before you do so.

To exercise any of the privacy rights afforded to you under applicable data protection laws, e-mail us at [privacy@heritagegolfgroup.com](mailto:privacy@heritagegolfgroup.com).

You will not be discriminated against in any way by virtue of your exercise of the rights listed in this Notice. However, should you withdraw your consent or object to processing of your Personal Information, or if you choose not to provide certain Personal Information, we may be unable to provide some, or all, of our Services to you.

Only you, or an agent that you authorize to act on your behalf, may make a request related to your Personal Information. We must verify your identity before fulfilling your requests, and if we cannot verify your identity, we may request additional information from you. If you are an authorized agent making a request on behalf of another person, we will also need to verify your identity, which may require proof of your written authorization or evidence of a power of attorney. We endeavor to respond to requests within the time period required by applicable law. If we require more time, we will inform you of the reason and extension period in writing.

We do not charge a fee to process or respond to your requests unless they are excessive or repetitive. If we determine that a request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request. We may deny certain requests, or only fulfill some in part, as permitted or required by law. If you are not satisfied with the resolution of your request and you are afforded a right to appeal such decision, you will be notified of our appeal process in our response to your request.

### **Children’s Privacy**

We do not knowingly collect or solicit any Personal Information from children, as defined under applicable law, without verified written parental consent, and we have no actual knowledge of selling such Personal Information of minors under 16 years of age. If we learn that we have collected Personal Information from a child, we will promptly take steps to delete that information. If you believe we might have any information from or about a child, please contact us at [privacy@heritagegolfgroup.com](mailto:privacy@heritagegolfgroup.com).

### **Changes to this Notice**

Please note that we may modify or update this Notice from time to time, so please review it periodically. If we make material changes to how we treat Personal Information, we will notify you according to applicable law. Unless otherwise indicated, any changes to this Notice will apply immediately upon posting to our Sites. You are responsible for periodically visiting our Sites and this Notice to check for any changes.

### **Contact Us**

If you have any questions about our practices or this Notice, please contact us at [privacy@heritagegolfgroup.com](mailto:privacy@heritagegolfgroup.com).