

PRIVACY POLICY

Last Revised: October 1, 2018

This Privacy Policy (“Policy”) describes how information about you is collected, used, and disclosed by Bishops Gate Golf Academy (“BGGA”), International Junior Golf Academy (“IJGA”), Education Services, Incorporated (“Heritage”) (collectively the “Academies”), and our parents, subsidiaries and affiliates including but not limited to the list of affiliated entities attached as [Exhibit A](#) hereto (collectively, the “Bishop Gate Entities”, “BGE”, “we” or “us”) when you access or use BGE websites, mobile applications, or other online services that link to this Policy (collectively the “Sites”).

This Policy applies solely to your use of our Sites. It does not apply to information we collect in connection with your attendance at the Academies or your participation in or presence at our events, programs, camps or other activities (other than forms and other information and communications submitted through the Sites), or if you otherwise interact with us.

INFORMATION COLLECTION

INFORMATION YOU PROVIDE TO US

BGE collects a variety of information from you when you choose to provide it to us in connection with your use of our Sites. This may include when you request information from us, apply to the Academies, register for a camp, program or event, create an account, fill out or submit a form or questionnaire, request transportation, add a contact, sign up for our newsletters or email lists, make a purchase, participate in our contests, promotions, sweepstakes, surveys, or interviews, request support, chat with us, send us a message, or otherwise communicate or interact with us via the Sites. The information we collect may include your name, contact information (including your address, email address, and telephone number), applicant/registrant information (including academic and educational information and history, age, birthday, demographic information, family and ethnic information, medical information, athletic experience and positions, applicant essays and parent assessments), payment information, and any other information you choose to provide.

INFORMATION WE AUTOMATICALLY COLLECT

Log Information: We log information about your use of the Sites, including the type of browser you use, access times, pages viewed, your IP address and the page you visited before navigating to our Site.

Device Information: We collect information about the computer or mobile device you use to access our Sites, including the hardware model, operating system and version, unique device identifiers and mobile network information.

Information Collected by Cookies and Other Tracking Technologies: We use various technologies to collect information, and this may include sending cookies to your computer or mobile device. Cookies are small data files stored on your hard drive or in device memory that helps us to improve our Sites and your experience, see which areas and features of our Sites are popular and count visits. We may also collect information using web beacons (also known as "tracking pixels"). Web beacons are electronic images that may be used in our Sites or emails and help deliver cookies, count visits, understand usage and campaign effectiveness and determine whether an email has been opened and acted upon. For more information about cookies, and how to disable them, please see "Your Choices" below.

INFORMATION WE COLLECT FROM OTHER SOURCES

We may receive information about you from other sources and link or combine that with information we collect about you. For example, we may collect information about you from third parties, including mailing list providers and publicly available sources.

INFORMATION USE

BGE may use the information we collect from and about you to:

- Operate, maintain, and improve the Academies and our Sites;
- Evaluate your application for the Academies or an Academy program, camp, event or activity;
- Facilitate communication with the Academies and Academies' staff;
- Send you technical notices, updates, security alerts and support and administrative messages;
- Provide and deliver the products and services you request, process forms and transactions, and send you related information, including notifications, confirmations and invoices,
- Develop new Services and content;
- Provide you with information about the Academies and about Academies' and third party events, programs, camps, activities, products, services, promotions and special offers that we think might be of interest to you;
- Personalize and improve the Sites and provide you with customized content, targeted offers, and advertising;
- Monitor and analyze trends, usage, and activities in connection with the Sites;
- Respond to your inquiries, requests, and comments and provide customer service;
- Facilitate contests, sweepstakes, and promotions and process and deliver entries, prizes, and rewards;

- Send you information, newsletters, and promotional materials from BGE and our partners;
- Protect the security or integrity of the Sites and our business;
- Link or combine with information we get from others to help understand your needs and provide you with better service; and
- Carry out any other purpose described to you at the point of data collection.

INFORMATION SHARING

BGE may share the information we collect from and about you as described in this Policy including:

- With our current and future parents, affiliates, subsidiaries, and other companies under common control and ownership;
- With third party service providers, vendors, and consultants who need access to the information to perform services for us or our students and participants;
- As necessary if we believe that there has been a violation of the BGE Terms of Service or of our rights or the rights of any third party;
- To respond to judicial process or provide information to law enforcement or regulatory agencies or in connection with an investigation on matters related to public safety, as permitted by law, or otherwise as required by law;
- In connection with any merger, sale of assets, financing, bankruptcy, or reorganization of our business; and
- With your consent or at your direction, including if we notify you that the information you provide will be shared in a particular manner and you provide such information.

Further, we may share aggregated or anonymous information that does not identify you.

LINKS TO OTHER SITES

Our Sites may contain links to other websites or to third party services, and any personal information you provide in connection with such linked pages or services is provided directly to that third party and is subject to that third party's privacy policy and terms of use. For example, Campsite, InfusionSoft, and PowerSchool are managed by third parties, and your use of these websites is subject to the terms and policies posted on their respective websites. This Privacy Policy does not apply to such linked sites, and we are not responsible for the privacy and security practices and policies of these websites or any other third-party sites or services that are linked to from the Site.

ADVERTISING AND ANALYTICS

We may allow others to provide analytics services and serve advertisements on our behalf across the Internet and in applications. These entities may use cookies, web beacons, device identifiers and other technologies to collect information about your use of the Sites and other websites and applications, including your IP address, web browser, mobile

network information, pages viewed, time spent on pages or in apps, links clicked, and conversion information. This information may be used by us and others to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests on our Sites and other websites and better understand your online activity. For more information about interest-based ads, or to opt out of having your web browsing information used for behavioral advertising purposes, please visit www.aboutads.info/choices. On your mobile device, you may also adjust your privacy and advertising settings to control whether you want to receive more relevant advertising. We may also work with third parties to serve ads to you as part of a customized campaign on other websites or platforms.

CALIFORNIA PRIVACY RIGHTS

For California residents: BGE may share your personal information with select third parties. Under California law, you may request information about our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please contact us at privacy@ijqa.com or privacy@bgga.com.

DATA STORAGE

Your information may be stored on servers in the United States and is subject to the laws of the United States, where the data protection and other laws may differ from those of other countries. Your information may be disclosed in response to inquiries or requests from government authorities or to respond to judicial process in the countries in which we operate. By accessing or using our Sites or otherwise providing information to us, you consent to the processing, transfer and storage of information in and to the United States and other countries, where you may not have the same rights and protections as you do under local law.

DATA SECURITY

BGE takes reasonable precautions (including certain physical, administrative, and technical measures) to help protect your information from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. Because there is always some risk in transmitting information over the Internet, we cannot guarantee the security of your information.

The Service may have links to third-party sites or applications, which may have privacy policies that differ from our own. We are not responsible for the practices of such sites or applications.

YOUR COMMUNICATION CHOICES

Promotional Communications. You may opt out of receiving promotional communications from BGE by following the instructions in those communications or by emailing privacy@ijqa.com or privacy@bgga.com. If you opt out, we may still send you non-promotional communications.

COOKIE POLICY

BGE ("we", "us", "our") is committed to protecting and respecting your privacy as described in our Privacy Notice, of which this Cookie Policy forms a part.

By consenting to this cookie policy ("Cookie Policy"), you acknowledge and consent to our website using cookies and other similar technologies (as described below) to distinguish you from other users of our website and for analytics. This helps us to provide you with a good experience during your visit to our website. This also allows us to improve our website and provide you with tailored content and advertising. For example, we can recognize and remember important information that will make it more comfortable browsing our website such as preferred settings.

A cookie is a small file of letters and numbers that we store via your browser on the hard drive of your computer or your mobile device, if you agree.

We may automatically collect and store certain information about your interaction with our website, including IP addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamps, and related data. We use this information, which does not identify individual users, solely to improve the quality of our products and services.

PURPOSES OF COLLECTION

You can find more information about the types of cookies we use and the purposes for which we use them set out below.

FIRST PARTY COOKIES

- Session Cookies (Technical Cookies): Their use is strictly limited to sending the session identifiers (random numbers generated by the server) needed for secure and efficient Website browsing. They are not permanently stored on the user's computer and are deleted upon browser closing. In particular, the use of the session cookies aims at ensuring security and improving of the offered service; and
- Technical Cookie: It is required to keep track of the consent given by the user.

- The described cookies do not require your consent to be installed and used.

THIRD PARTY COOKIES

Some third parties can also provide cookies on our website(s). These cookies or similar technologies are managed by the third parties set out in the table below, and are divided into the following categories:

- **Analytical Cookies:** we use Google Analytics, the web analytics service offered by Google, Inc. (“Google”) to analyze how our Website is used. This service uses cookies generating information on your use of our Website (including your IP address), collected from Google in an anonymous form. Disabling these third-party cookies does not affect the Website use;
- **Marketing/Advertising:** Cookies used to provide advertising services on a given Website fall within this category. Disabling these third-party cookies does not affect the Website use; and
- **Profiling Cookies:** They are used to trace the user’s network browsing and create profiles about his/her tastes, behavior, choices, etc. These cookies allow the transmission of online advertising messages to the user’s device with the preferences already expressed by that same user when browsing. In accordance with applicable laws, using these cookies and any processing related thereto require the prior user’s consent. Disabling these third-party cookies does not affect the Website use.

We suggest that you visit these third-party websites to understand how their cookies are used.

Type of Cookie	Purpose of Cookie	Profiling	Duration	Link
Google Analytics	The web analytics service offered by Google, Inc. (“Google”), to analyze how our Website is used. This service uses cookies generating information on your use of our Website (including your IP address), collected from Google in an anonymous form. Disabling these third-party cookies does not affect the Website. These cookies are used to collect information about how visitors use our website. We use the information to compile reports and to help us	Yes	3 years	https://policies.google.com/technologies/partner-sites

Type of Cookie	Purpose of Cookie	Profiling	Duration	Link
	improve the website. The cookies collect information in an anonymous form, including the number of visitors to the website, where visitors have come to the website from and the pages they visited.			
DoubleClick	Used to track the actions of visitors to the site. These cookies may be used to optimize paid media activity such as removing those who have already bought tickets from any future digital ticket sales campaigns	Yes	3 years	https://policies.google.com/technologies/partner-sites
Facebook	Used to track the actions of visitors to the site that have come from Facebook. These cookies may be used to optimize Facebook activity such as removing those who have already bought tickets from any future digital ticket sales Facebook campaigns	Yes	3 years	https://www.facebook.com/full_data_use_policy
Adobe Analytics	The web analytics service offered by Adobe, to analyze how our Website is used. This service uses cookies generating information on your use of our Website (including your IP address), collected from Adobe in an anonymous form. Disabling these third-party cookies does not affect the Website. These cookies are used to collect information about how visitors use our website. We use the information to compile reports and to help us improve the website. The cookies collect information in an anonymous form, including the number of	Yes	3 years	https://www.adobe.com/privacy/policy.html

Type of Cookie	Purpose of Cookie	Profiling	Duration	Link
	visitors to the website, where visitors have come to the website from and the pages they visited.			
Youtube	Used to track the actions of visitors to the site that have come from YouTube. These cookies may be used to optimize YouTube activity such as removing those who have already bought tickets from any future digital ticket sales Facebook campaigns	Yes	3 years	https://policies.google.com/technologies/partner-sites
Yahoo	Used to collect non-personally identifiable information regarding offline collected attributes and digital usage patterns of users of mobile devices and computers. We use the information to compile reports and to help us improve our marketing. We use non-personally identifiable means, including "cookies", "pixel tags," and in some instances, statistical ID's, to collect and store Preference Data. We do not use flash cookies.	Yes	3 years	https://policies.oath.com/ie/en/oath/privacy/index.html
Olark	Plugin used to enable chat with customers and sales advisors. Conversations are recorded for accuracy and training.	No	3 years	https://www.olark.com/privacy-policy
Call Tracking Metrics	Plugin used to track and record phone calls placed to sales advisors. Conversations are recorded for accuracy and training.	No	3 years	https://www.calltrackingmetrics.com/legal/privacy/
Plugins for collecting "contact form" data	These are plugins which enable us to access your "contact form" data which we can use to promote competitions.	No	3 years	Refer to above for specific plugins

You also acknowledge and consent to the use of third party cookies (including, for example, those provided by operators of advertising networks and providers of external services like web traffic analysis services). You acknowledge that where we allow advertising networks, external services, and other third-party services on the website, we have no control over cookies they collect.

REFUSING OR DELETING COOKIES

Most internet browsers are set up by default to accept cookies. However, if you want to refuse or delete any cookies (or similar technologies), please refer to the help and support area on your internet browser for instructions on how to block or delete cookies (for example: Internet Explorer, Google Chrome, Mozilla Firefox and Safari). Please note you may not be able to take advantage of all the features of our Website, including certain personalized features, if you delete or refuse cookies.

To opt out of Google Analytics, visit <https://tools.google.com/dlpage/gaoptout>.

For more information on managing cookies, please go to www.allaboutcookies.org.

IF YOU ARE A RESIDENT IN THE EU

For more information on managing cookies, please visit www.youronlinechoices.eu which has further information about behavioral advertising and online privacy.

CHANGES TO OUR COOKIE POLICY

This Cookie Policy may be updated from time to time.

If we change anything important about this Cookie Policy we will notify you through a pop-up on the website for a reasonable length of time prior to and following the change. You may review the Cookie Policy by visiting the website and clicking on the "Policy" link in the footer.

EU RESIDENT PRIVACY NOTICE

This Privacy Notice last changed on October 1, 2018

This notice describes how we use your personal information.

WHO WE ARE

We are BGE and we respect your privacy.

Your personal information is collected by BGE ("we"/"us"/"our").

BGE's contact details are as follows: Tel: (855) 378-8177; Address: Bishops Gate Golf Academy, 26945 Bella Vista Drive, Howey-in-the-Hills, FL 34737.

If you have questions, please contact our Privacy Specialist at: privacy@ijqa.com or privacy@bgga.com.

DATA COLLECTION AND USAGE

We will collect store and use your personal information:

1. to conduct our business;
2. to allow access to this website, register / subscribe / buy / use our products and services;
3. to meet our legal obligations;
4. to fulfil any purpose(s) we make known to you when we collect your personal information; and
5. to fulfil other purposes set out in more detail in this section.

Certain types of personal information are more sensitive than others. "Special information" about you includes information about health, disability, race, ethnicity, biometrics or religion. We may collect and receive special information about you.

We have identified here the types of information we may collect or receive, how we will use it and why we will use it.

The table below explains what information we collect and how and why we use it.

What information we collect	How we use your data	Why we use your information
<p>We collect your personal information in a number of ways:</p> <ul style="list-style-type: none">• when you set up a user account;• when you subscribe to email updates, newsletters or other subscriptions and features made available on our website from time to time;• when you participate in our contests, promotions, sweepstakes, surveys	<p>We use this information to:</p> <ul style="list-style-type: none">• identify products and services that may be of interest to you (e.g. offering recommended relevant content to you);• personalize our service to you: to provide you with, make available, and show you more of the things which interest you, based on your activity and feedback;• do statistical analysis and research with the	<p>We use this information because:</p> <ul style="list-style-type: none">• this is necessary to enter into or perform our contract with you;• this is necessary to comply with legal or regulatory requirements;• we have a legitimate business interest to:• tell you about the various products and services we can offer;• understand how you use our products, services, platforms Apps and websites;• understand the type of products and services our customers buy and how they use them;• Ensure you remain engaged with our services via competitions and prize draws;

What information we collect	How we use your data	Why we use your information
<p>or live voting features on our website.</p> <p>Specifically, we collect personal information you give us such as your name, address, e-mail address, password, account settings and preferences.</p> <p>Further information may be collected about you if you register for an account via a social media platform including Facebook, Google, Twitter.</p>	<p>purpose of allowing us to better understand the breakdown of our customers, the products / services being bought, the demographics of those buying our products and services, what attracts our customers to our products and services, where our customers have come from online (such as from links on other websites or advertising banners), and the way in which our website or App is used by different user groups based on recent visits to and how you move around different sections of our website;</p> <ul style="list-style-type: none"> • create an account for you to use our website; • provide our services; • manage and administer our systems; • help us ensure that our customers are genuine and to prevent fraud; • identify how you'd like to use your account • Send you our newsletters; 	<ul style="list-style-type: none"> • understand and respond to customer feedback; • research and analyze the services our customers want; • improve our services based on what we learn from your activity and the activity of others on recent visits to our website; • postal marketing; or • direct marketing to business contacts. <p>In addition to the above, where we have obtained your consent to use the data, then we can rely on that consent.</p>

What information we collect	How we use your data	Why we use your information
	<ul style="list-style-type: none"> • Administrating the competition or prize draw; • Contact you and provide you with the prize if you win the competition or prize draw; • Announce the winner of the competition or prize draw on our Website or Apps; • Request that you be involved in other publicity for us or third parties; • Confirm that you are logged-in to the App using your Facebook, Twitter or Google+ accounts; • Share this information with third parties if you have provided your consent to this; • Insert details on surveys / voting if relevant. 	
<p>We also collect your information when you attend or register to attend one of our events or an event at which we activate.</p> <p>Specifically, we collect personal information you give us such as your name, address, e-mail address. We may also collect your photograph, audio</p>	<p>We use this information to:</p> <ul style="list-style-type: none"> • identify products and services that may be of interest to you (e.g. offering recommended relevant content to you); • personalize our service to you: to provide you with, make available, and 	<p>We use this information because:</p> <ul style="list-style-type: none"> • this is necessary to enter into or perform our contract with you; • we have a legitimate business interest to: • understand and respond to customer feedback; • manage and administer our events efficiently; or • direct marketing to business contacts.

What information we collect	How we use your data	Why we use your information
<p>and video records, and your date of birth.</p>	<p>show you more of the things which interest you, based on your activity and feedback;</p> <ul style="list-style-type: none"> • do statistical analysis and research with the purpose of allowing us to better understand the breakdown of our customers, the products / services being bought, the demographics of those buying our products and services, what attracts our customers to our products and services, where our customers have come from online (such as from links on other websites or advertising banners), and the way in which our website or App is used by different user groups based on recent visits to and how you move around different sections of our website; • provide you with information about the event that you are attending; • ensure your eligibility to attend events; • manage and administer our events efficiently; 	<ul style="list-style-type: none"> • In addition to the above, where we have obtained your consent to use the data, then we can rely on that consent.

What information we collect	How we use your data	Why we use your information
	<ul style="list-style-type: none"> • help us ensure that visitors to event are genuine and to prevent fraud; • identify how you'd like to use your account; • send you our newsletters; • administrating the competition or prize draw; • contact you and provide you with the prize if you win the competition or prize draw; • announce the winner of the competition or prize draw on our website or Apps or in our events; • request that you be involved in other publicity for us or third parties; • share this information with third parties if you have provided your consent to this. 	
<p>Information about the way you use our services:</p> <ul style="list-style-type: none"> • the content that you have viewed and/or purchased; • the things that we've provided, or you've purchased; • when and where you have accessed content 	<p>We use this information to:</p> <ul style="list-style-type: none"> • identify products and services that may be of interest to you (e.g. offering recommended relevant content to you); • personalize our service to you: to 	<p>We use this information because:</p> <ul style="list-style-type: none"> • this is necessary to enter into or perform our contract with you; • we have a legitimate business interest to: • tell you about the various products and services we can offer;

What information we collect	How we use your data	Why we use your information
<p>and/or made the purchases (including where information can be identified from your IP address);</p> <ul style="list-style-type: none"> • what you paid and how; • whether you've opened electronic communications from us; • whether you've clicked on links in electronic communications from us; • your marketing preferences. 	<p>provide you with, make available, and show you more of the things which interest you, based on your activity and feedback;</p> <ul style="list-style-type: none"> • do statistical analysis and research with the purpose of allowing us to better understand the breakdown of our customers, the products / services being bought, the demographics of those buying our products and services, what attracts our customers to our products and services, where our customers have come from online (such as from links on other websites or advertising banners), and the way in which our website or App is used by different user groups based on recent visits to and how you move around different sections of our website; • improve our services and efficiency of service delivery to help us meet your needs and expectations based on recent visits to and how you move around 	<ul style="list-style-type: none"> • understand how you use our products; services, Apps and websites • understand the type of products and services our customers buy and how they use them; • understand and respond to customer feedback; • research and analyze the services our customers want; • improve our services; • ensure that we are better able to personalize our offers to you; • postal marketing; or • direct marketing to business contacts. <p>• In addition to the above, where we have obtained your consent to use the data, then we can rely on that consent.</p>

What information we collect	How we use your data	Why we use your information
	<p>different sections of our website;</p> <ul style="list-style-type: none"> • develop new services based on recent visits to and how you move around different sections of our website; • monitor the way our website is used; • (to allow you to upload your photos and videos for use in the App; • combine this information with other types of information mentioned above to allow us to make our services more personal and tailored to each customer's preferences and habits. 	
<p>Information that you give us to make an online purchase, including:</p> <ul style="list-style-type: none"> • your contact details including: your name, address, email address; • your bank account details; • the details you provide to open an online account with us; • the product / service purchased. 	<p>We use this information, including to:</p> <ul style="list-style-type: none"> • process your order; • take payment from or give you a refund; • on-board you as a customer; • provide our products and services; • manage and administer our services; • help us ensure that our customers are genuine and to prevent fraud; 	<p>We use this information because:</p> <ul style="list-style-type: none"> • this is necessary to enter into or perform our contract with you; • this is necessary to comply with legal or regulatory requirements; • we have a legitimate business interest to: <ul style="list-style-type: none"> • tell you about the various products and services we can offer; • understanding how you use our products, services, platforms, Apps and websites based on recent

What information we collect	How we use your data	Why we use your information
	<ul style="list-style-type: none"> • send personalized offers or shopping ideas which are based on your shopping habits; • combine this information with other types of information mentioned above to allow us to make our services more personal and tailored to each customer's preferences and habits. 	<p>visits to and how you move around different sections of our website;</p> <ul style="list-style-type: none"> • understanding the type of products and services our customers buy and how they use them; • understanding and responding to customer feedback; • researching and analyzing the services our customers want; • improve our services and better understand how our customers use them based on recent visits to and how you move around different sections of our website; • ensure that we are better able to personalize our offers to you; • postal marketing; or • direct marketing to business contacts. <p>• In addition to the above, where we have obtained your consent to use the data, then we can rely on that consent.</p>
<p>Information when you communicate with us whether in person, through our website, Apps or via email, over the phone, through social media or via any other medium, including:</p> <ul style="list-style-type: none"> • your contact details (this may include your social media account if that's the way you communicate with us); • the details of your communications with us (including when you sent it, when we 	<p>We use this information, including to:</p> <ul style="list-style-type: none"> • answer any issues or concerns; • monitor customer communications for quality and training purposes; • develop new services which is based on the information you provide; • improve our services based on the information and feedback you provide 	<p>We use this information because:</p> <ul style="list-style-type: none"> • this is necessary to enter into or perform our contract with you; • this is necessary to comply with legal or regulatory requirements; • we have a legitimate business interest to: • understand customer feedback and respond to customer communications in a consistent manner; • ensure that we are better able to personalize our offers to you;

What information we collect	How we use your data	Why we use your information
<p>received it and where you sent it from (such as our website, Apps, via email, through social media));</p> <ul style="list-style-type: none"> the details of our messages to you. <p>We may also use our "chatbot" tool to facilitate our communications with you. Our Chatbot tool is an automated tool which can respond to your questions and comments.</p>	<p>and the information and feedback provided by others;</p> <ul style="list-style-type: none"> personalize our service to you to take account of the information and feedback you have provided. 	<ul style="list-style-type: none"> research and analyze the services our customers want; improve our services based on the feedback you provide; provide security over our business and who we trade with; prevent and detect fraud; use artificial intelligence to route customers to the most appropriate part of the organization; or verifying customer details. <p>In addition to the above, where we have obtained your consent to use the data, then we can rely on that consent.</p>
<p>Information that we collect through your use of the website:</p> <ul style="list-style-type: none"> technical information, including IP address, login information, browser type and version (e.g., Internet Explorer, Firefox, Safari, etc.), time zone setting, browser plug-in types and versions, operating system you are using (e.g., Vista, Windows XP, Mac OS, etc.), platform, device type, hardware model, MAC address, unique device identifiers and mobile network information; information about your visit, including the full URL clickstream to, 	<p>We use this information to:</p> <ul style="list-style-type: none"> provide our services; <p>provide and adapt our services to take account of the technical capabilities of our users and to ensure content is presented in the most effective manner;</p> <ul style="list-style-type: none"> Analyse site traffic and understand customer needs and trends; improve our services and for efficiency of service delivery to help us meet your needs and expectations based on recent visits to and how you move around 	<p>We use this information because:</p> <ul style="list-style-type: none"> this is necessary to enter into or perform our contract with you; this is necessary to comply with legal or regulatory requirements; we have a legitimate business interest to: understanding how our customers use our products, services, Apps and websites tell you about the various products and services we can offer; ensuring network and information security; fraud prevention and detection; use of artificial intelligence to route customers to the most appropriate part of the organization; assessing the number of visitors, posts, page views, reviews and

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<p>through and from our website (including date and time);</p> <ul style="list-style-type: none"> • information about your network, such as information about devices, nodes, configurations, connection speeds, and network and application performance; • pages you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page. 	<p>different sections of our website;</p> <ul style="list-style-type: none"> • personalize our services to you: to provide you with, make available, and show you more of the things which interest you, based on your activity and feedback; • identify products and services that may be of interest to you; (e.g. offering recommended relevant content to you); • develop new services based on what we learn from your activity and the activity of other customers; • identify issues with the website and user's experience of them; • do statistical analysis and research with the purpose of allowing us to better understand the breakdown of our customers, the products / services being bought, what attracts our customers to our products and services, where our customers have come from online (such as from links on other websites or 	<p>followers in order to optimize future marketing campaigns;</p> <ul style="list-style-type: none"> • postal marketing; or • direct marketing to business contacts. • In addition to the above, where we have obtained your consent to use the data, then we can rely on that consent.

What information we collect	How we use your data	Why we use your information
	<p>advertising banners), and the way in which our website is used by different users groups;</p> <ul style="list-style-type: none"> • monitor the way our website is used. • combine this information with other types of information mentioned above to allow us to make our services more personal and tailored to each customer's preferences and habits. 	
<p>Information that we collect from third party partners and corporate customers which includes:</p> <ul style="list-style-type: none"> • payment processing companies; • your employer, contractor, agent; • your bank; • our affiliated entities (“group”); • publicly available sources such as the electoral roll; • Other third parties you have authorized to share your information <p>This information includes:</p> <ul style="list-style-type: none"> • Name and title, contact details, company name, business title, email 	<p>We use this information, including to:</p> <ul style="list-style-type: none"> • provide our services; • manage and administer our systems; • take payment from or give you a refund; • help us ensure that our customers are genuine and to prevent fraud; • personalize our service to you; • statistical analysis and research so that we can better understand our customers and allow us to develop and improve our services; • combine this information with other types of information mentioned above to 	<p>We use this information because:</p> <ul style="list-style-type: none"> • this is necessary to enter into or perform our contract with you; • this is necessary to comply with legal or regulatory requirements; • we have a legitimate business interest in: • developing and maintaining relationships with vendors, partners and other companies and dealing with individuals who work for them; • conducting research to improve our services; • ensuring network and information security; • fraud prevention and detection; • providing security over our business and who we trade with; • direct marketing to business contacts.

What information we collect	How we use your data	Why we use your information
<p>address, mailing address, educational background;</p> <ul style="list-style-type: none"> • Where our contacts have online accounts, log-in and similar credentials and information about use of these services; • Communications with our business contacts. 	<p>allow us to make our services more personal and tailored to each customer's preferences and habits.</p>	<ul style="list-style-type: none"> • In addition to the above, where we have obtained your consent to use the data, then we can rely on that consent.
<p>Information that we collect incidentally from other sources or public sources, including:</p> <ul style="list-style-type: none"> • information available in the media; • information presented on our social media or wider social media platforms including Facebook, Twitter and Instagram; • information collected by security systems (such as CCTV) when you visit our premises or attend our events. 	<p>We use this information, including to:</p> <ul style="list-style-type: none"> • maintain market awareness; • build and maintain social media branding; • provide security to our sites. 	<p>We use this information because:</p> <ul style="list-style-type: none"> • this is necessary to enter into or perform our contract with you; • this is necessary to comply with legal or regulatory requirements; • we have a legitimate business interest to: <ul style="list-style-type: none"> • providing security over our business; • maintaining a public profile within the media; • maintaining the accuracy of data we hold; • conducting research to improve our services; • ensuring network and information security; • fraud prevention and detection; • providing security over our business and who we trade with; • developing and maintaining relationships with vendors, partners and other companies; or • dealing with individuals who work for them in our sector

What information we collect	How we use your data	Why we use your information
		<ul style="list-style-type: none"> In addition to the above, where we have obtained your consent to use the data, then we can rely on that consent.
<p>Information that we collect from individuals representing organizations, including:</p> <ul style="list-style-type: none"> contact details of individuals working for organizations; other personal information regarding such individuals. 	<p>We use this information, including to:</p> <ul style="list-style-type: none"> build relationships with other organizations; provide marketing communications to these individuals; improve our services and develop new services based on the preferences and behaviors of these individuals. 	<p>We use this information because:</p> <ul style="list-style-type: none"> we have a legitimate business interest to: develop and maintain relationships with vendors, partners and other companies; deal with individuals who work for them in our sector tell you about the various products and services we can offer; conducting research to improve our services;
<p>Special Categories of Information that you give us or that we receive when using our services:</p> <ul style="list-style-type: none"> Specifying certain dietary requirements that imply specific religious beliefs or medical conditions; Health records; Biometric data. 	<p>We use this information to:</p> <ul style="list-style-type: none"> Provide our services; Verify our customers' identities and prevent fraud. 	<p>Some personal information is treated as falling into a special category. This includes information about health, disability, race, ethnicity, biometrics or religion and used to be known as sensitive personal data.</p> <p>We will use your health / biometric data where:</p> <ul style="list-style-type: none"> we have your explicit consent for the relevant purpose; this is necessary to protect your vital interests in an emergency or those of another person; the relevant information has been made public by you;

What information we collect	How we use your data	Why we use your information
		<ul style="list-style-type: none"> • this is necessary or in connection with legal claims or court proceedings.

If you would like to have more information about our legitimate interests to process your personal data, please contact us as set out below.

We will also receive information about you (including your personal information) if you use any other websites or apps operated or other services provided by us or our group companies. In this case, that information will be shared within our group companies and combined with information collected by us. We will also receive and display information and content which you make publicly available on your social media accounts.

Some information is processed because you've given your consent to that (where consent is required). You can withdraw your consent at any time by contacting privacy@ijqa.com or privacy@bgga.com.

SOURCES OF DATA

Your personal information is either (a) provided by you (e.g. via our website / platform / App /social media pages); (b) obtained from third parties (such as other group companies); or (c) obtained from publicly available sources.

In particular, data may be obtained from the following third parties: galleries, payment processing companies, Google Adwords, LinkedIn, Google Analytics, display partners, social networks, third party site plugins.

LEGAL AND OTHER REQUIREMENTS

In some cases we need to collect or retain personal information for legal reasons.

Some of the personal information we request is required to provide the services and if it is not provided, we may not be able to provide the relevant products and services to you or provide information you have requested from us. If the personal information is needed to participate in an activity on our website, you may not be able to do so if you do not provide that personal information to us.

In other cases, for example, when we request your personal data to send you marketing and promotional communications or to personalize your experience with our services, the lack of such information will mean it is impossible to send you these communications or to personalize your experience, but it will not have any consequence to the primary purpose of the data collection (to provide the services).

Your personal information may also be processed if it is necessary on reasonable request by a law enforcement or regulatory authority, body or agency, or in order to investigate, prevent or take action regarding suspected illegal activities or fraud, to enforce or apply our Terms of Use and other agreements, to protect the rights, property or safety of group companies, customers, clients and others or in the defense of legal claims. We will not delete personal information if relevant to an investigation or a dispute or until applicable law allows for it to be deleted. It will continue to be stored until those issues are fully resolved and it can be lawfully deleted.

Any personal information you supply to us through our website must be complete and accurate. You also agree to allow us to contact you to verify your personal information, if we need to.

HOW LONG DO WE KEEP YOUR INFORMATION

We generally keep information as needed to provide services and to deal with legal claims

We will keep your information for as long as it is reasonably necessary and to deal with claims. It will depend on factors such as whether you've got an account with us, have interacted with recent offers or have attended our recent events. We will also retain your information as necessary to comply with legal, accounting or reporting requirements.

We will also retain a copy of your contact details if you object or opt-out of receiving direct marketing communications from us. We will add your details to our suppression list to ensure you do not receive any future marketing communications from us. Also, we will not delete personal data if relevant to an investigation or a dispute. It will continue to be stored until those issues are fully resolved.

INFORMATION WE SHARE

There are certain circumstances where we transfer your personal data to employees, contractors and to other parties.

- We share information about you with other members of our group of companies so we can provide the best service across our group. They are required to keep and use your information in accordance with this Privacy Notice.
- We will:
 - share aggregated, anonymized or other de-identified data with advertisers, advertising networks and social networks that require the data to select and serve relevant adverts to you and others. We will also use aggregate information to help advertisers reach the kind of audience they want to target.
 - make use of the personal information we have collected from you to help our advertisers display their advertisements to a target audience and to present our promotional messages to you including using Facebook Custom Audience. This means you will be presented with advertisements that are more relevant to you as a result of the personal information we hold about you.

- share your personal data with and access information from analytics and search engine providers that assist us in the improvement and optimization of the website and the app and for better personalization of content and advertising.
- We share your information with certain contractors or service providers. They may process your personal data for us, for example, if we use a marketing agency. Other service providers include advertising agencies, IT suppliers, database providers, backup and disaster recovery specialists, email providers and outsourced call centers. Our suppliers and service providers will be required to meet our standards on processing information and security. The information we provide them, including your information, will only be provided in connection with the performance of their function. They will not be permitted to use your information for any purposes other than those outlined in this Privacy Notice.
- We also share your information with certain third parties. We will do this either when we receive your consent or because we need them to see your information to provide products or services to you. Your personal information may be transferred to other third-party organizations in certain scenarios:
 - if we discuss selling or transferring part or all of our business – the information may be transferred to prospective purchasers under suitable terms as to confidentiality;
 - if we are reorganized or sold, information may be transferred to a buyer who can continue to provide services to you;
 - if we're required to by law, or under any regulatory code or practice we follow, or if we are asked by any public or regulatory authority – for example the Police;
 - if we are defending a legal claim your information may be transferred as required in connection with defending such claim;
 - if there is an emergency including which requires us to share your data to protect the health and safety of our website's or App's users or the general public.

Your personal data may be shared if it is made anonymous and aggregated, as in such circumstances the information will cease to be personal data.

WHERE YOUR INFORMATION WILL BE HELD

Your information may be transferred outside the European Economic Area.

The information that we collect from you may be transferred to and stored at a destination outside the European Economic Area (EEA), including the USA which does not have equivalent data protection laws to those applicable to Europe. It may also be processed by staff operating outside the EEA who work for us, for one of our group companies, or for the organization that hosts our website.

However, to ensure your personal information is properly protected in line with EU data protection law, the transfer of this information is governed by a contract including Standard

Contractual Clauses (SCCs) approved by the European Commission in accordance with Article 46(2)(c) of the General Data Protection Regulation.

We will only transfer data to jurisdictions outside the scope of the European General Data Protection Regulation (GDPR) where the appropriate safeguards set out in the GDPR are in place.

If you would like to obtain copies of the regulator-approved SSCs please contact us on the contact details below.

YOUR RIGHTS

You have certain rights in relation to your information. The availability of these rights and the ways in which you can use them are set out below in more detail.

Some of these rights will only apply in certain circumstances. If you would like to exercise, or discuss, any of these rights, please contact privacy@ijga.com or privacy@bgga.com.

- Access: you are entitled to ask us if we are processing your information and, if we are, you can request access to your personal information. This enables you to receive a copy of the personal information we hold about you and certain other information about it.
- Correction: you are entitled to request that any incomplete or inaccurate personal information we hold about you is corrected.
- Erasure: you are entitled to ask us to delete or remove personal information in certain circumstances. There are also certain exceptions where we may refuse a request for erasure, for example, where the personal data is required for compliance with law or in connection with claims.
- Restriction: you are entitled to ask us to suspend the processing of certain of your personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Transfer: you may request the transfer of certain of your personal information to another party.
- Objection: where we are processing your personal information based on a legitimate interest (or those of a third party) you may challenge this. However, we may be entitled to continue processing your information based on our legitimate interests or where this is relevant to legal claims. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Consent: where we are processing personal data with consent, you can withdraw your consent. If you want to exercise any of these rights, please contact privacy@ijga.com or privacy@bgga.com.

You also have a right to lodge a complaint with a supervisory authority, in particular in the Member State in the European Union where you are habitually resident where we are based or where an alleged infringement of Data Protection law has taken place. In the UK you can make a complaint to the Information Commissioner's Office (Tel: 0303 123 1113 or at www.ico.org.uk).

RIGHT TO OBJECT

You have a right to object to us processing your information in certain circumstances.

Objection: where we are processing your personal information based on a legitimate interest (or those of a third party) you may challenge this. However, we may be entitled to continue processing your information based on our legitimate interests or where this is relevant to legal claims. You also have the right to object where we are processing your personal information for direct marketing purposes.

DIRECT MARKETING

As described above, you can opt-out of receiving direct marketing from us at any time.

We may use the information you give us on our website / App for direct marketing purposes to provide updates, newsletters, events, or other communications that we think may interest you. We will only do this with your consent (where required by law).

You can opt-out of receiving direct marketing from us at any time. You can do this by changing your marketing preferences on your online accounts settings page, clicking on the "unsubscribe" link included at the end of any marketing email we send to you, or by contacting privacy@ijga.com or privacy@bgga.com.

ANALYSIS AND MARKETING

We use third party tools to personalize the advertising displayed to you on our website / App.

We use third party tools, to make the advertising we show you on our website, Apps and / or our partner websites more relevant and interesting to you, and to provide advertising to you on third party non-partner websites (including social media websites such as Facebook). Please see our Cookies Policy for further information.

You may opt-out at any time from the collection and use of your data by contacting us at privacy@ijga.com or privacy@bgga.com.

DO NOT TRACK

You can enable a 'Do Not Track' feature in your browser's settings, if your browser supports that feature. When Do Not Track is turned on, your browser will send a Do Not Track request to the sites you visit. The Do Not Track request lets these sites know that you prefer not to have your browsing activity tracked. You can take similar steps in mobile.

To submit a Do Not Track request on mobile using an iOS device:

- launch the Settings app on your iPhone → Privacy → Advertising.
- toggle ON the switch next to Limit Ad Tracking.

- now that you have opted out of receiving ads targeted to your interests, based on your Apple ID on that device, you will be removed from the list of users receiving targeted ads.

To submit a Do Not Track request on mobile using an Android device

- open Google Settings,
- select AdsPrivacy and toggle ON the switch next to Do Not Track to opt out of Ads Personalization. Do Not Track is now enabled on your Android device.
- Apps are then instructed not to use your advertising ID to build profiles or show you personalized ads.

Some devices may require a different procedure, so please check your instructions.

COOKIES AND SIMILAR TECHNOLOGIES

We and our advertising agency partners use cookies and "web beacons" that identify your browser.

Cookies collect and store information when you visit our website including information about how you use it through which it is possible to monitor your use of the website, as well as provide you with a better service and experience when browsing the website and for analytics.

Web beacons (also known as "single pixel GIFs", "clear GIFs" or "tags") are small graphic images that may be included on our website. Web beacons:

- allow us to optimize our products and services;
- provide us and third-party partners with analytics information, such as how many visitors our website receives; and
- are used by us in our email correspondence to determine whether you open them or take any further action.

We also work with other organizations to place our cookies and web beacons on their websites or in their advertisements. We do this to help us develop statistics on how often clicking on an advertisement on our websites results in a purchase or other interaction on the advertiser's website.

For more information about cookies and how we use them, please see our [Cookie Policy](#).

SECURITY

The transmission of information via the internet is not completely secure. Although we will take reasonable measures to protect your personal information, we cannot guarantee the security of your information transmitted through our platform and any transmission is at your own risk. Once we have received your personal information, we will use procedures and security features to try to prevent unauthorized access.

LINKS TO THIRD PARTY WEBSITE

Our website, newsletters, email updates and other communications may, from time to time, contain links to and from the websites of others including our partner networks, advertisers and other group companies and/or social networks as offered to you and supported by your browser.

The personal data that you provide through these websites is not subject to this privacy notice and the treatment of your personal data by such websites is not our responsibility. If you follow a link to any of these websites, please note that these websites have their own privacy notices which will set out how your information is collected and processed when visiting those sites. For more information about the purpose and scope of data collection and processing in connection with social sharing features, please visit the privacy notices of entities through which you choose to share.

CHILDREN

We do not knowingly collect information from children or other persons who are under 18 years old. If you are under 18 years old, you may not submit any personal information to us or subscribe for the services. If you believe we might have any personal information from or about a person under the age of 18, please contact privacy@ijga.com or privacy@bgga.com.

CHANGES TO THIS NOTICE

This notice may be changed from time to time.

If we change anything important about this notice (the information we collect, how we use it or why) we will highlight those changes at the top of the notice and provide a prominent link to it for a reasonable length of time following the change.

Once this notice is posted on our website, it will automatically come into force. The latest version of this notice will prevail over all previous versions.

If you would like to access previous versions of this notice please contact privacy@ijga.com or privacy@bgga.com.

HOW TO CONTACT US

If you would like more information about the way we manage personal information that we hold about you, or are concerned that we may have breached your privacy and wish to make a complaint, please contact us as set out below. We will do our best to resolve your complaint.

If you have any questions about this notice please contact privacy@ijga.com or privacy@bgga.com.

IF YOU HAVE QUESTIONS

If you have any questions about this Privacy Policy or the practices described herein, you may contact us at privacy@ijqa.com or privacy@bgga.com.

REVISIONS TO THIS POLICY

BGE reserves the right to revise this Privacy Policy at any time. When we do, we will post the change(s) on the Sites and update the date at the top of this Privacy Policy. If we change the Privacy Policy in a material way, we will provide appropriate notice to you. We encourage you to review the Privacy Policy whenever you access the Sites to stay informed about our information practices and the ways you can help protect your privacy.

EXHIBIT A

BGE-AFFILIATED ENTITIES

Bishops Gate Golf Academy, LLC, Bishops Gate Academy, LLC, Bishops Gate Property Company, LLC, Bishops Gate Summer Experience, LLC, Bishops Gate Support Services, LLC, Bishops Gate Tennis Academy, LLC, Calabar Foundation, Inc., Coach Performance Institute, LLC, Hilton Head Sports Services, LLC, International Junior Golf Academy, Inc., International Junior Sports Academies, LLC, Junior Champions Tour, LLC, Premier Corporate Professional Services, LLC, Education Services, LLC, IJGT, Inc., Junior Champions Foundation, NCM Properties, LLC and Junior Sports Corporation