

Data Protection Policy

Data protection is a matter of trust and your trust is important to us. Trust begins with transparency. This data protection policy therefore explains how and why we collect, process and use your personal data.

For instance, this data protection policy describes the following:

- which personal data relating to you we collect and process;
- when we collect your personal data;
- the purposes for which we use your personal data;
- how long we store your personal data;
- who has access to your personal data;
- what rights you have related to your personal data.

1. Who are we?

Fundamentally, the following company is responsible for processing data in line with this privacy policy ('we' or 'us'):

Federation of Migros Cooperatives
Coordination Club Schools/Leisure Facilities
Josefstrasse 214
8005 Zurich

If you have any questions about this data protection policy or the processing of your personal data, please do not hesitate to contact us:

datenschutz@golfparks.ch

2. What personal data do we process and for what purposes?

We process a variety of personal data depending on the circumstances and purpose. You can find more information in this section and in the general terms and conditions and similar conditions, or in additional privacy policies. Generally speaking, we collect your personal data from you directly; e.g. when you transmit data to us or communicate with us, perhaps through a contact form. Our forms contain mandatory fields, such as your name, address, email address, phone number and message, in order that we are able to respond to your enquiry, query, complaint or other message relating to you. If a contract is concluded (e.g. a subscription) through such forms, we also collect details relating to the transaction, such as your payment method and billing address, in order that we are able to process the conclusion of the contract and provide the contractual service.

Personal data can also be collected from other sources; e.g. from other companies of the Migros Group or third parties, such as credit agencies, media monitoring companies, online service providers, such as providers of online analytics services, financial service providers for payments, list brokers, public registers, the media, the internet, etc.

We process personal data relating to you for the following purposes in particular:

- in order to communicate with you and third parties;
- in order to enter into and execute contracts with you;
- in order to enter into and execute contracts with our suppliers, customers and business

- partners connected to you, and for customer/supplier relationship management;
- in order to provide, administrate, secure and personalise websites, apps, online services and other infrastructure, such as wifi;
 - in order to know our customers and their habits, preferences and affinities better and personalise our services;
 - in order to assess and improve the acceptance of our products and services, and our communication in connection with products and services;
 - for advertising and marketing; e.g. in order to host events, competitions, etc., and send information and marketing material to specific target groups by post and through electronic channels (unless the recipient has objected to direct marketing);
 - for market and opinion research;
 - in order to prepare and execute corporate acquisitions and sales and similar transactions;
 - in order to manage and administrate our IT and other resources;
 - for accounting, archiving, training and other administrative purposes;
 - in order to test and improve our internal processes and share personal data within the Migros Group;
 - in order to ensure the safety of our employees, buildings and premises;
 - in order to review and comply with legal obligations, including court and official orders, for compliance and for the detection and investigation of misuse;
 - in order to enforce our claims and the claims of affiliated companies, and defend claims against us, our employees, affiliated companies and contractual and business partners before courts and authorities in Switzerland and abroad.

3. On what legal grounds do we process personal data?

We process personal data on various legal grounds, depending on the purpose of the data processing. When we process your personal data, we do so on the following legal grounds in particular:

- in order to perform a contract or take steps before entering into a contract at your request (e.g. verification of your application);
- in order to serve legitimate interests;
- on the basis of consent, where we ask for your consent separately;
- in order to comply with statutory regulations

As a rule, you are not obliged to disclose personal data unless you are in a contractual relationship with us that establishes such an obligation. However, we have to collect and process personal data that is necessary or legally required to enter into and execute a contractual relationship and to fulfil the related obligations. Otherwise, we cannot conclude or continue the contract in question. Essentially, the processing of log data and certain other data when using a website is mandatory. When communicating with us, we must at least process the personal data that you transmit to us or which we transmit to you.

4. To whom do we disclose your personal data?

Our employees have access to your personal data where necessary for the above-mentioned purposes and the activities of the employees in question. These include employees of Migros leisure facilities and in support areas, such as IT. They operate in line with our instructions and are obliged to treat your personal data as confidential and secret.

We can disclose your personal data to other companies of the Migros Group. The Migros Group

encompasses the Federation of Migros Cooperatives, the regional Migros cooperatives and the subsidiaries of each one, including the enterprises in our own industry, various retail and travel companies and several foundations. Personal data is often disclosed to other group companies for the purposes of internal administration. In certain cases, individual companies of the Migros Group might also act in their own interests and process your personal data for the purposes described in this privacy policy. Therefore, depending on the specific purpose, your personal data might be associated and processed with other personal data originating from other companies of the Migros Group.

We may disclose your personal data to third parties within and outside the Migros Group if we wish to use their services (e.g. IT service providers). By selecting our service providers and entering into appropriate contractual agreements, we ensure that data protection is maintained even when your personal data is processed by third parties.

Furthermore, in individual cases, it is possible that personal data may be disclosed to other companies for their own purposes, particularly if we are legally obliged to disclose the data (e.g. to authorities) or to assert or defend legal claims. In such cases, the recipient of the data is legally responsible for data protection.

5. When do we transmit your personal data abroad?

The recipients of your personal data might be located abroad, or outside the EU or EEA. The countries in question may not have legislation that protects your personal data to the same extent as in Switzerland or the EU or EEA. If we transmit your personal data to such a country, we will ensure the protection of your personal data, normally by entering into data transmission contracts with the recipients of your personal data in third countries to ensure the necessary level of data protection.

6. How do we process personal data in connection with websites and email newsletters?

When you visit and use our website and apps, we process technical data, such as the date and time of your visit to our website, the duration of your visit and the pages you visited, information about your device (tablet, PC, smartphone, etc.) and browser request, and general information about your operating system and browser. For reasons of IT security and in order to improve user-friendliness, this usage data serves as the basis for anonymous statistical analyses that enable us to identify trends in order to improve our products and services for our website. We also use cookies, i.e. files that are stored on your device (tablet, PC, smartphone etc.), when you visit our website and similar technology. Some cookies are necessary for the functionality of the website and are deleted automatically after your visit. We use other cookies to store settings (e.g. your chosen language) for future visits and to collect anonymous statistics relating to the use of our website.

Additionally, we use cookies from third-party providers to collect the information required by their services. As a rule, we do not transmit personal data to such third-party providers. However, the third-party providers collect information about your use of our website in order to provide their services. These services are primarily statistical analyses of how you use our website. However, third-party providers may combine the information obtained from you with data from other websites you have visited and use the information for their own purposes (e.g. to manage advertisements on partner websites). If you registered with the provider in question, the provider will be able to identify you. The provider processes your personal data on its own responsibility and in line with its own data protection policy.

An example of a statistical analysis service is Google Analytics, which is a service provided by Google in the US. Google uses cookies to collect information about how you use our website and about your end device (tablet, PC, smartphone, etc.); for instance, information about your browser, the website from which you came to our website, the name of your provider, your IP address, the date and time of your visit to the website, pages visited and time spent on each, and possibly visits to other websites and apps. We receive analysis from Google on the basis of this information. Google stores this information in the US, although your IP address is shortened beforehand in the EU or EEA. You can deactivate Google Analytics by installing a browser add-on from <https://tools.google.com/dlpage/gaoptout>.

When we send newsletters by email, we are able to determine if and when you open the email. This enables us to analyse how you use the email and tailor our content more closely to your interests. You can configure your email software to prevent this data processing.

You can prevent use of the above-mentioned technology: You can configure your browser to prevent acceptance of cookies and delete stored cookies, and apps can be uninstalled or configured to prevent use of or reject cookies. Additionally, you can configure your email software so that no information about your use of email is transmitted.

Furthermore, our website uses plugins from social networks, such as Facebook, Twitter, YouTube, Google+, Pinterest and Instagram. These plugins are deactivated by default. When they are activated, the providers of the social networks can register that you have visited our website. The providers may use that information for their own purposes, on their own responsibility and in line with their own data protection policies.

7. Do we use automated decision making?

As a rule, we do not use automated decision making. We will notify you separately if we use automated decision making in individual cases. 'Automated decision-making' refers to decisions based solely on automated processing; i.e. with no relevant human input and which produce negative legal effects or other similar negative effects.

8. How long do we store personal data?

We store your personal data for as long as necessary for the specific purpose for which we collected it, and in the case of a contract at least for the term of the contractual relationship. Furthermore, we store personal data if we have a legitimate interest in storing it. In particular, this might be the case if we require personal data to enforce or defend claims, for archiving purposes and in order to ensure the security of our IT systems. Additionally, we will store your personal data for as long as it is subject to a mandatory storage period; for example, some data must be stored for ten years. Shorter mandatory storage periods apply to other data; for instance, records of certain actions on the internet (log files). In certain cases, we will also ask for your consent if we want to store personal data for longer. We will erase or anonymise your personal data when these periods expire.

9. How do we protect your personal data?

We have implemented appropriate technical security measures (e.g. encryption, pseudonymisation, logging, restricted access and data back-ups) and organisational (e.g. instructions for our employees,

confidentiality agreements and inspections) to ensure the security of your personal data in order to protect it against unauthorised or illegal processing, and to counteract the risk of loss, unintentional modification, unwanted disclosure or unauthorised access. However, security risks cannot be ruled out entirely; certain residual risks are unavoidable.

10. What rights do you have in connection with the processing of your personal data?

You are entitled to object to the processing of data if we process your personal data on the basis of a legitimate interest. Additionally, you may object to the processing of data in connection with direct marketing (e.g. promotional emails) at any time. The same applies to profiling insofar as it relates to such direct marketing.

Where the relevant criteria are met and no legal exceptions apply, you also have the right to information, rectification, erasure, restriction of processing and objection to our processing of data, and the right to receive the personal data you provide in a standard format. Furthermore, you are entitled to withdraw any consent you have given; this does not affect the lawfulness of data processing carried out before your withdrawal of consent. You may also lodge a complaint with the relevant supervisory authority.

11. Amendments to this data protection policy?

This data protection policy can be amended over time, in particular if we change how we process data or if new legal regulations come into effect. We notify persons whose contact details are registered with us of significant amendments, provided that doing so does not involve disproportionate effort. In general, data processing is subject to the version of the data protection policy valid when the processing started.