

## DATA PROTECTION POLICY

### KIKUOKA COUNTRY CLUB

We attach great importance to the protection of your personal data.

The present data protection policy aims at informing you about the way KIKUOKA Country Club ASBL and the limited company Kikuoka Luxembourg S.A. (jointly “**Kikuoka**”) may process your personal data in the framework of their activities devoted to promoting the practice and the knowledge of golf, in your capacity of:

- Club Members;
- Visitors of the Club;
- Users of our website [www.kikuoka.lu](http://www.kikuoka.lu), of the Facebook page [Kikuoka Country Club](#) and of the dedicated Kikuoka Country Club page of the website [www.allsquaregolf.com](http://www.allsquaregolf.com).

Our policy provides you with information on our processing of your personal data. It explains how we collect, process and protect your personal data, and our purposes in so doing. It also explains your rights in connection with any personal data processed by Kikuoka.

Kikuoka processes your personal data in compliance with the applicable legislation, in particular:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (“**GDPR**”), and
- The law of 1 August 2018 on the organization of the *Commission nationale pour la protection des données* [National Commission for Data Protection] and the General Data Protection Scheme.



Our **data protection policy** covers in particular to the following questions:

- 1. WHO IS RESPONSIBLE FOR PROCESSING YOUR PERSONAL DATA?**
- 2. WHY DO WE COLLECT YOUR PERSONAL DATA?**
- 3. HOW DO WE OBTAIN YOUR PERSONAL DATA?**
- 4. DO WE USE COOKIES?**
- 5. WHO DO WE SHARE YOUR PERSONAL DATA WITH?**
- 6. ARE YOUR PERSONAL DATA TRASFERRED OUTSIDE OF THE EUROPEAN UNION?**
- 7. HOW DO WE PROTECT YOUR PERSONAL DATA?**
- 8. HOW LONG DO WE KEEP YOUR PERSONAL DATA?**
- 9. WHAT ARE YOUR RIGHTS AND HOW CAN YOU EXERCISE THEM?**

If you receive the present policy in electronic format, please click on the above links to be immediately directed to the relevant information.

We reserve the right to update and modify our data protection policy in order for it to reflect any possible changes in the way we process your personal data and /or to take account of any changes in the relevant legal requirements.

Any change to the present data protection policy will be notified on our website [www.kikuoka.lu](http://www.kikuoka.lu), and, if need be, it will be notified to you. We kindly suggest visiting the [www.kikuoka.lu](http://www.kikuoka.lu) website often in order to be always up to date on possible changes to our data protection policies.



## 1. WHO IS RESPONSIBLE FOR PROCESSING YOUR PERSONAL DATA?

The data controllers responsible for the processing of your personal data are: **Kikuoka Country Club ASBL** and the limited company **Kikuoka Luxembourg S.A.**, both established and with registered offices at Scheirhaff, L-5412 Canach, registered with the Luxembourg Company register with the references F 3486 and B 28646 respectively (“**Kikuoka** “ or “**we**”).

For any question related to your personal data or your rights, please contact us:

- via email : [privacy@kikuoka.lu](mailto:privacy@kikuoka.lu), or  
Mr Patrick Platz, Director, [pplatz@kikuoka.lu](mailto:pplatz@kikuoka.lu);
- by phone : +352 35 74 50 ;
- via regular mail at the following address: Kikuoka Country Club  
Scheirhaff, L-5412 Canach Luxembourg.

## 2. WHY DO WE COLLECT YOUR PERSONAL DATA?

We collect your personal data in a legitimate manner as necessary to pursue the following purposes:

- the management of the Kikuoka Country Club, in order to promote the practice and knowledge of golf and its related activities among its members;
- the management of Memberships in the framework of the execution of membership contracts signed with Kikuoka Luxembourg S.A.;
- the organization and promotion of Kikuoka's activities;
- the management of the website [www.kikuoka.lu](http://www.kikuoka.lu);
- the management of the Kikuoka golf course, clubhouse and infrastructure.



The table below summarizes the reasons why we process your personal data, the data involved and the persons concerned by such processing as well as the legal basis on which the processing is founded.

<i>PRURPOSES of the processing</i>	<i>WHAT ? Types of data processing</i>	<i>WHO?</i>	<i>Legal basis</i>
<ul style="list-style-type: none"> <li><b>Management of the Kikuoka, namely administrative and financial management of the association</b> Keeping and publishing the <u>list of Members</u>, organisation of the annual General Assembly, of the Board of Administrators and keeping the financial records, including the management of claims and disputes.</li> </ul>	<p><b>Identification and contact data:</b> name, surname, phone number, address, email address, family composition.</p> <p><b>Bank data</b> bank account number, card holder name, card number.</p>	<i>Members and Visitors</i>	<i>Legitimate interests and legal obligations</i>
<ul style="list-style-type: none"> <li><b>Management of Memberships</b> Handling Membership applications and “one-year Trial Membership Agreements”</li> </ul>	<p><b>Identification and contact data:</b> name, surname, phone number, address, email address, ID/passport number, place of birth, nationality, national health system reference, family composition.</p> <p><b>Bank data:</b> bank account number, card holder name, card number.</p> <p><b>Contract and personal characteristics data:</b> Main adult member, partner, children, junior Members.</p>	<i>Members and Membership applicants</i>	<i>Pre-contractual measures and execution of a contract to which the data Controller is a party</i>
<ul style="list-style-type: none"> <li><b>Organisation of Kikuoka’s activities, such as:</b></li> </ul>	<b>Identification and contact data</b> name, surname, place of birth, age, sex, nationality, preferred language, IP	<i>Members</i>	<i>Legitimate interests</i>



<p>Organisation of teams, stages and sport events</p> <p>Management and handling of applications to participate in various events (sport-related or not) organised by Kikuoka</p> <p>Management of Greenfees</p>	<p>address etc.</p> <p><b>Bank data:</b> bank account number, card holder name, card number.</p> <p><b>Personal characteristics</b> including handicap and series, club of origin, licence number, PRO, PR, PE, AP level, ranking or results obtained in competitions and tournaments, participation in sport competitions</p>	<p><i>including minors</i></p> <p><i>Visitors and sport and non-sport events participaters</i></p>	<p><i>Performance of obligations resulting from a contract to which the Data Controller is a party</i></p>
<ul style="list-style-type: none"> <li><b>Promotion of Kikuoka's activities, including the management</b> of the <u>website</u> <a href="http://www.kikuoka.lu">www.kikuoka.lu</a>, of the <u>Facebook</u> page, and of the <u>Allsquare</u> page, etc.</li> </ul> <p>Handling of questions and <u>information requests</u> addressed to Kikuoka via the website or similar channels</p> <p>Management of the different "<u>forums</u>" and "<u>communities</u>" on the website, Facebook page and Allsquare page</p>	<p><b>Identification and contact data</b> name, surname, place of birth, age, sex, nationality, preferred language, IP address etc.</p> <p><b>Data related to one's level as golf player</b> HCP; PRO, PR, PE, AP level, ranking or results obtained in competitions and tournaments</p> <p><b>Images</b> Taken during events, competitions or other Kikuoka activities.</p>	<p><i>Members,</i></p> <p><i>future Members and participants in Kikuoka's activities</i></p> <p><i>including minors</i></p>	<p><i>Legitimate interests</i></p> <p><i>Consent</i></p>
<ul style="list-style-type: none"> <li><b>Management of Kikuoka golf course, clubhouse and infrastructure,</b> including <u>security</u> of property and infrastructure (premises, course) as well as security of people and computer networks and video surveillance</li> </ul>	<p><b>Personal characteristics</b> video surveillance images</p>	<p><i>Members, including minors</i></p> <p><i>Visitors and Staff</i></p>	<p><i>Legitimate interests</i></p>



### 3. HOW DO WE OBTAIN YOUR PERSONAL DATA?

We collect your personal data:

- In principle **directly from you** and on the basis of your authorization in the case of minors under your parental authority;
- **Via the PC CADDY application:** PC CADDIE://online GmbH & Co. KG, Kikuoka's IT service provider and data processor, whose data confidentiality policy is available on the Kikuoka website at the following address: <https://www.pccaddie.net/share/common/pcco/datenschutz.pdf> ;

### 4. DO WE USE COOKIES ?

- *What is it?* Cookies are text files which are placed in a dedicated area of the hard drive of your device (computer, tablet, mobile phone or any other device optimized for the Internet) when viewing online content or advertising. Such Cookie files can only be read by their issuer. A Cookie file allows its issuer, during its period of validity, to recognize the relevant terminal each time the terminal accesses a digital content with Cookies of the same issuer.

We only use so-called "*technical*" and "*Social Networks*" cookies:

- **"Technical" Cookies** are necessary for navigating through our website, as well as to access different products and services. In particular, Technical Cookies allow us you to recognize you, to indicate your passage on a given page and thus to improve your browsing comfort: adapting the presentation of the website to your terminal display preferences (display resolution), memorize passwords and other information relating to a form that you may have filled in on the website (registration or access to the licensed space). Technical Cookies can also be used to implement security measures (for example, when you are asked to log in again to the licensed space after a certain amount of time).
- **"Social Networks" Cookies** allow the sharing of content on our website with other people or to let other people know about your consultation or your opinion about some website content. This applies in particular to the buttons "share" and "I like", of social network. The social network providing such an active button is likely to identify you through the button, even though you might not have used it during your visit to our website. We invite you to consult the privacy policies of the relevant social networks in order to be informed of the purposes, including advertising, for which they collect the navigation-related information through such active buttons.



By using our website, you consent to the use of these Cookies. However, you may choose at any time to disable all or part of these Cookies, with the exception of Technical Cookies necessary for the operation of the site as indicated above.

## **5. WHO DO WE SHARE YOUR PERSONAL DATA WITH?**

Insofar as they are necessary for the purposes defined in this policy, your personal data may also be consulted and used, in addition to the managers, employees and employees of Kikuoka, by:

- Our IT and Internet System Manager based in Germany (PC CADDIE://online GmbH & Co. KG);
- Our partners in the organization of golf tournaments and competitions and other events organized in Kikuoka;
- The Luxembourg Golf Federation and the other sports federations;
- Our insurers.

We may still transmit, if necessary, some personal data to the local public authorities, to our lawyers, to the public bailiffs, to the police etc., in order to comply with the legal or regulatory requirements to which we are subject or to assert our rights or exercise them in Court.

Our third parties indicated above may be required to receive or have access to some of your personal data in different ways, each according to their roles, in line with the purposes specified above.

## **6. ARE YOUR PERSONAL DATA TRANSFERRED OUTSIDE OF THE EUROPEAN UNION?**

Your personal data will not in principle be transferred to a third country outside the European Economic Area ("EEA") or an international organization.

However, in the event that it would be strictly necessary for the purposes defined in this policy, we may have to transfer your personal data to countries outside the European Economic Area, which may not offer the same level of data protection as the Grand Duchy of Luxembourg

## **7. HOW DO WE PROTECT YOUR PERSONAL DATA?**

We are committed to implementing appropriate technical and organizational measures to ensure that an appropriate level of security to prevent the destruction, loss, alteration, unauthorized disclosure or accidental/unlawful access to your personal data that may have been transmitted, stored or otherwise processed.



## 8. HOW LONG DO WE KEEP YOUR PERSONAL DATA?

Your personal data is retained only **for the time necessary** to fulfil the purposes defined in this policy.

In order to determine the retention period of your personal data, we use the following criteria:

- the requirements of applicable data protection laws;
- the purposes of the processing involving your data;
- the period during which we provide you with services or during which we have a contractual relationship with you;
- our legal obligations to keep certain information for a minimum period;
- applicable time-limitation periods.





## 9. WHAT ARE YOUR RIGHTS AND HOW CAN YOU EXERCISE THEM?

The GDPR provides you with specific rights according to the legal basis on which Kikuoka found the processing of your personal data.

In this context, you have:

- **A right of access:** you have the right to obtain confirmation on whether your personal data are being processed or not. When this is the case, you have the right to access the personal data which are processed by Kikuoka.
- **A right of rectification:** you have the right to obtain rectification of inaccurate or incomplete information about you that is processed by Kikuoka.
- **A right to the erasure of your data:** you have the right to obtain the erasure of your personal data in the following situations: (i) your data are no longer necessary for the purposes for which Kikuoka collected them; (ii) you withdrew your consent where the processing performed by Kikuoka is based on consent and there is no other legal basis for such processing; (iii) you object to the processing of your personal data and there is no compelling legitimate reason justifying the processing; (iv) the data is subject to unlawful processing; (v) the data must be erased due to a legal obligation.
- **A right of opposition:** you can oppose the processing of your personal data in two situations: (i) where the processing concerned is based on your consent, in which case you can oppose its processing without having to provide any particular reasons; (ii) where the processing is based on the legitimate interests of Kikuoka, you can oppose that processing for reasons related to your particular situation, unless Kikuoka is able to demonstrate that there are legitimate grounds and imperative reasons for such processing which prevail over your interests, rights and freedoms, or else for the verification, exercise or defence of its rights in Court.
- **A right to limitation of the processing of your data:** you have the right to suspend processing of personal data while a verification is being carried out (verification of the accuracy of information, of the legal basis of processing, and of the legitimate reasons that the Kikuoka opposes to their erasure).
- **A right to request the transfer of your data** to another provider. This right applies when the processing is based on your consent or the performance of a contract, and is performed using automated processes.

If you have any additional questions or would like to file a complaint about the processing of your personal data, you can contact Kikuoka S.A. at the email address [privacy@kikuoka.lu](mailto:privacy@kikuoka.lu).

Finally, the GDPR provides you with the **right to lodge a complaint** with the supervisory authority. In Luxembourg the competent authority is the National Commission for the Protection of Data (*Commission Nationale pour la Protection des Données*) (<https://cnpd.public.lu/fr.html>)

