

# PRIVACY NOTICE

## Wyantenuck Country Club Privacy Notice

Effective date: April 26, 2023

Last modified: April 26, 2023

### INTRODUCTION

This Privacy Notice provides information about how Wyantenuck Country Club, with a business address of 46 West Sheffield Road, Great Barrington, MA 01230, (“**Wyantenuck**”, “**we**”, “**our**”, “**us**”) collects and processes the personal data of individuals (“**you**”, “**your**”) who visit and/or interact with our website [www.wyantenuck.org](http://www.wyantenuck.org) (the “**Website**” or “**Site**”), and to all subsequent correspondence or communications with those individuals, whether by email, telephone, post, or otherwise.

We reserve the right to amend this Privacy Notice at any time, for any reason, without notice to you, other than the posting of the amended Privacy Notice on the Website. We recommend that you check the Website often, referring to the date of the last modification listed at the top.

It is important that you read this Privacy Notice so that you are aware of how and why we are using your personal data.

### HOW WE COLLECT YOUR PERSONAL DATA

We may receive your personal data through various means including **Direct interactions**:

You may give us your identity and contact data, profile data, transaction data and other information by creating and managing your user profile account, filling in website forms, sharing details about our services or by corresponding with us by mail, phone, email, SMS, social media or otherwise. This includes personal data you provide when you submit information, give us feedback, or contact us.

We may receive your personal data through various means including **Automated technologies**:

As you browse and interact with the Website, we collect browser data. We collect this personal data by using cookies and other similar technologies. Please see our Cookies Policy below for further details.

**Cookies:** A cookie is a simple text file that is stored on your computer or mobile device when you visit a website. When you visit the website again, or visit another website which recognizes that cookie, your device is able to communicate with the website and the website can read the information held in that cookie. Only that server will be able to retrieve or read the contents of that cookie. Each cookie is unique to your web browser. It will contain some anonymous information such as a unique identifier as well as the website name. Cookies may be set by the website you are visiting (“first party cookies”) or they may be set by other websites who run content on the page you are viewing (“third party cookies”).

Cookies have various purposes, including letting you navigate between pages efficiently, storing your preferences, and generally improving your experience of a website. Most websites you visit will use cookies to improve your user experience by enabling that website

to “remember” you, either for the duration of your visit (using a “session cookie”) or for repeat visits (using a “persistent cookie”).

We may use the following first party cookies and third party cookies on our Site:

- **Strictly Necessary cookies:** These cookies are essential in order to enable you to move around the Site and use its features, such as accessing secure areas of the Site. The Site needs Strictly Necessary cookies for it to work. If you remove or disable these Cookies, we cannot guarantee that you will be able to use our Site.
- **Analytical/performance cookies:** These cookies provide generic statistics on the use of our website by allowing us to recognize and count the number of visitors and to see how they move around and access the site. This helps us to improve the way the Site works, for example, by ensuring that users find what they are looking for easily.
- **Functionality cookies:** These are used to recognize you when you return to our Site and remember your preferences.
- **Targeting cookies:** This type of cookie records your visit to our Site, the pages you have visited and the links you have followed or come into the Site on. Depending on the pages that you have visited, the cookie may trigger advertising for us on third-party websites either related or unrelated to our business. We may use this information for re-targeting or offer based promotional uses by us from time to time.
- **Device tokens:** These may record the time of an event, how a user came to our Site, search keywords users have used in connection with the Site or Services, information about the device our user is on such as their operating system, and browser, as well as the city, region, and country location of users.

Except for Strictly Necessary cookies and any others which are essential for the functioning of this Site, you can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. You can set these preferences on your browser settings. However, each browser is different so check your browser’s Help menu to learn how to modify your cookies. This may prevent you from taking full advantage of this Site.

We employ commonly used third-party analytic services that may automatically collect and store information about visits to the Site. We do not have direct control over the tools these third-party analytic services use to collect data. We use this information to get a better sense of how our Site is being used over time so that we can improve it and make it more relevant to users and in ways described herein.

Please note that:

- Many of the interactive functions offered by the Site are dependent on cookies and disabling or blocking cookies may impact the functionality of the Site or result in an inferior web experience.
- If you’ve chosen to block third-party cookies on your browser, your cookie preferences won’t carry over from the Site and vice versa.
- We have no access to or control over any cookies or other devices that are used by any third party advertisers or ad servers on the Site.

If your personally identifiable information changes, or if you no longer wish us to possess your information, you may request correction, updating, or deletion of your information by emailing us at [jen@wyantenuck.org](mailto:jen@wyantenuck.org)

**WHY WE PROCESS YOUR PERSONAL DATA**

Subject to applicable law, your personal data may be stored and processed by us for purposes detailed in the following table:

Purpose for processing personal data	Categories of personal data
User profiles	<ul style="list-style-type: none"> <li>• Identity data such as name, address, phone number(s), email address, date of birth, gender, marital status, family members, member number, member type, credit card information, club spending history, account history, golf handicap, GHIN number.</li> </ul>
<p>Marketing/Administrative</p> <ul style="list-style-type: none"> <li>• To inform you of programs, events, and products</li> <li>• To invite you to upcoming events</li> <li>• To provide administrative services</li> <li>• To carry out marketing analysis; for example, we look at what you have viewed on our Website and what your preferences are to improve the relevance of our marketing</li> <li>• To provide statistical data to vendors</li> </ul>	<ul style="list-style-type: none"> <li>• Your preferences in receiving marketing communications from us</li> <li>• <b><i>If you would prefer that we do not send such communications to you, please follow the opt-out links on any marketing message or contact us using the contact details in this Privacy Notice.</i></b></li> </ul>
Browser data	<ul style="list-style-type: none"> <li>• Internet protocol (IP) address used to connect your computer to the Internet</li> <li>• Your browser type and version</li> <li>• Time zone setting</li> <li>• Browser plug-in types and versions</li> <li>• Operating system and platform</li> <li>• How often you visit the Website</li> <li>• Website performance data</li> </ul>

## **THIRD PARTY INFORMATION**

### ***Other individuals' personal data***

- Where you provide us with personal data relating to other people, you represent and warrant that you will only do so in accordance with applicable law, including data protection laws. You will ensure that before doing so, the individuals in question are made aware of the fact that we will hold information relating to them and that we may use it for any of the purposes set out in this privacy statement, the Website Terms of Use, and where necessary you will obtain their consent to our use of their information. You will provide anyone that you provide us with personal data about with a copy of this Privacy Notice. We may notify those individuals that you have provided their details to us.

### ***Information collected through third-party links and content***

- This Website may include links to other websites including vendors and other content from third party businesses and can offer direct interaction with external websites, networks or platforms that are outside our control. These third-party businesses may use cookies, web beacons or other similar technology to collect information about you. We do not have access to or control over these third parties or the cookies, web beacons or other technology that these third parties may use. We are not responsible for the security, privacy of the information collected by these third parties or the privacy practices of these third parties or the content on any third-party website. You are encouraged to review the privacy policies of the different websites you visit.

## **DISCLOSURE OF YOUR PERSONAL DATA**

We reserve the right to disclose your personal data to third parties:

- if we are under any legal or regulatory duty to do so;
- to protect our rights or the safety of us, our personnel, users, or others; and
- to provide statistical data to vendors.

We also use third party service providers as our processors to only hold and use personal data on our behalf in order to provide us with a service. We may also disclose personal data to our professional advisors and experts in order to obtain their assistance in carrying out our services and our activities. We require these parties to keep your personal data confidential and secure and to protect it in accordance with the law. They are only permitted to process your personal data for the lawful purpose for which it has been shared and in accordance with our instructions.

## **SECURITY OF YOUR PERSONAL DATA**

Wyantenuck is committed to maintaining the security of your personal data it processes. Wyantenuck maintains appropriate physical, procedural, organizational, and technical security measures intended to prevent loss, misuse, unauthorized access, disclosure, or modification of your personal data under Wyantenuck's control. We also limit access to your personal data within our organization and to third parties that need access to your information in providing

service to us. They will only process your personal data on our instructions and are required to protect personal data. If you have reason to believe that your personal data is no longer secure, please contact us - [jen@wyantenuck.org](mailto:jen@wyantenuck.org) - immediately.

Please be aware that when you transmit information to us or to our service provider over the internet or another telecommunications network this can never be guaranteed to be 100% secure.

We cannot guarantee against any loss, misuse, unauthorised disclosure, alteration or destruction of data but we take reasonable steps to prevent this from happening. We have put in place measures to protect the security of your personal data and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **RETENTION OF YOUR PERSONAL DATA**

We strive to ensure that personal data is kept as current as possible and that irrelevant or excessive data is deleted or made anonymous as soon as reasonably practicable. We generally retain personal data for as long as is required to satisfy the purpose for which it was collected. We are required to keep certain types of information for a specific period of time in order to comply with legal requirements. Some of your personal data may need to be retained because of circumstances such as a legal dispute or regulatory investigation, which would not normally be subject to retention.

## **UPDATING YOUR PERSONAL DATA**

You are responsible for notifying us of any changes to your personal data that you provide to us.

## **CHILDREN**

Our Website and Service are not intended for children under 13 years of age. No one under age 13 may provide any personal information to or on the Website or Service. If you are under 13, do not use this Website or Service or provide any information about yourself to us, including your name. If a parent or guardian is made aware that a child under the age of 13 has provided us with personally identifiable information through any point of contact, we ask to be contacted by email via the contact page and we will delete the information.

## **LOCATION OF THE WEBSITE AND SERVICE**

This Website and Service is hosted and operated in the United States. Those who access or use the Website from jurisdictions outside the United States do so at their own choice and risk and are solely responsible for compliance with local law. If you are not a resident of the United States, you acknowledge and agree that we may collect and use your personal information

outside your home jurisdiction and that we may store your personal information in the United States or elsewhere.

## **QUERIES AND COMPLAINTS**

If you have any questions or wish to exercise any of your rights, please contact us by email at [jen@wyantenuck.org](mailto:jen@wyantenuck.org).

To review the Terms of Use policy, please click [HERE](#)