

# Privacy Policy – GDPR Privacy Policy

## Introduction

The Visage Mobile Golf Information System is a touchscreen technology mounted in a golf car that provides real-time information including course layout, GPS distance to pins, pro tips, digital scorecards and the ability to order refreshments during the round.

GPSi takes its data protection responsibilities seriously and Visage comes with privacy by default so players need to do nothing and their privacy remains protected.

To enhance your playing experience we can collect and use some personal data about you when you start your round of golf.

This policy describes how this personal data must be collected, handled and stored, not just to comply with the EU General Data Protection Regulation, but also to meet our own high standards of data protection.

## Data protection law

The General Data Protection Regulation (GDPR) sets out how organisations, including GPSi, must collect, process and share personal data. These rules apply regardless of whether data is stored electronically, on paper or using other materials.

GPSi must comply with, and be able to demonstrate its compliance with, the six principles the GDPR is based on, which are that personal data are:

1. Processed fairly and lawfully
2. Obtained only for specific lawful purposes
3. Adequate, relevant and not excessive
4. Accurate and kept up-to-date
5. Not held for any longer than necessary
6. Secure and protected.

The lawful basis under which we collect and process your personal data is consent.

## The personal data we can collect from you

Visage does not need any personal data to be provided by players to benefit from its core functionality. Players can, if they choose to, provide their names for the scorecard during the start-up procedure. The name a player enters can be any combination of letters and does not have to be their true name.

Once the round has been completed, players can send their scorecard to the pro shop to be printed out, which requires no further input from them, or provide their email address and Visage will send them an electronic copy of the scorecard.

## How we use the personal data you give us

Personal data entered into Visage is only used in relation to the round of golf being played. It is not shared with any third parties or used for any other purpose than that described in this policy.

## Personal data we might provide to you

Visage can be used to send short messages to/from the golf car. The options for sending from the golf car are limited to a set of pre-programmed messages, for example, “we lost a club”. The marshals at your golf club, as well as using pre-programmed messages, can also send free text messages. In some cases these may contain names and contact details of people known to the players.

## **How long we retain your personal data**

Player names, email addresses and the content of free text messages are only accessible on our live system for seven days. As part of our back up procedure we keep these data for 30 days but it is only accessible if we have to restore the back up for any reason.

## **Who can access your personal data?**

The course marshals are able to see your name and email address while it remains on our live system.

GPSi support people are able to view these details if they need to help with any system issues.

You can also access your data and confirm the processing that we do with it by contacting us at [support@gpsindustries.com](mailto:support@gpsindustries.com) or 888-575-2901.

## **We keep your personal data secure**

We have a robust set of security controls in place to protect the confidentiality of the personal data that you give us. The short period of time what we keep your personal data also helps to provide an element of protection for your personal data.

## **Review of this Policy**

This policy is reviewed at least annually, or when there is a significant change to how we collect and/or process your personal data.