

Falcon Golf Management Limited (“FGML”) Privacy Notice

The Privacy Notice was last updated: December 2023

Falcon Golf Management Limited (“**FGML**”) and its affiliate Dubai Business Associates want you to be familiar with how we collect, use, and disclose your Personal Information. **FGML** refers to Falcon Golf Management Limited, its subsidiaries and other partnerships, corporations, undertakings and entities which succeeds the functions of FGML to which this Privacy Notice relates. **FGML** is the controller of your data whether received directly or through Dubai Business Associates. When we refer to **FGML**, **we**, **us** and **our** we mean Falcon Golf Management Limited. When we refer to **your** and **you**, we mean users of our Services. When we refer to **Personal Information**, we mean any information about an individual from which that person can be identified. It does not include data where the identity has been removed, which is commonly referred to as anonymous data.

This Privacy Notice describes our practices in connection with the following information that we collect online and offline:

- through our websites [FalconandAssociates](#) and [Dubai Business Associates](#) (“**Websites**”);
- through social media properties like our Instagram and LinkedIn Page (“**Our Social Media**”) from which you are accessing this Privacy Notice;
- through HTML-formatted email messages that we send to you that link to this Privacy Notice (“**Emails**”);
- through services we provide to our partners, patrons, corporate and institutional clients (“**Corporate Services**”); and
- through any other offline business interactions, you may have with us (“**Offline Interactions**”).

Collectively, we refer to the Websites, Our Social Media, Emails, Corporate Services and Offline Interactions as the “**Services**.” This notice describes our processing activities.

Please click on the relevant heading below for more information on each of these areas.

- **collection of personal information**
- **how we obtain your personal information**
- **the purpose and lawful basis on which we use your personal information**
- **how long we keep your personal information / data retention**
- **who we share your personal information with**
- **which countries we transfer your personal information to**
- **how we protect your personal information / data security**
- **your rights regarding your personal information**
- **making a complaint**
- **updates to this Privacy Notice**

Collection of Personal Information

Personal information is information that identifies you as an individual or relates to an identifiable individual.

We need to collect Personal Information in order to provide the requested Services to you. If you do not provide the information requested, we may not be able to provide the Services. If you disclose any Personal Information relating to other people to us or to our service providers in connection with the Services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Notice.

We may collect, use, store and transfer different kinds of Personal Information about you which we have grouped together as follows:

- Identity Data** includes first name, last name, username or similar identifier, date of birth and gender.
- Contact Data** includes email and postal address, social networking profile(s) and telephone numbers.
- Dubai Business Associates Data** includes information about you such as but not limited to your nationality, location, age, education history, personal biography, identification documents (including but not limited to passport copy, national ID, visa, driving licence), contact information and interests.
- Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our Websites.
- Usage Data** includes information about how you use our Websites and Services such as the page views and site navigation paths, the pattern of the users' use of the Service with regards to timing and frequency.
- Transactional Data** where payment is made through one of our reputable business partners such as Network International LLC, we will not have access to that information. You can learn more about Network International LLC's security and processing activities [here](#).
- Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use, and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from your Personal Information but is not considered Personal Information in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific Website feature. However, if we combine or connect aggregated data with your Personal Information so that it can directly or indirectly identify you, we treat the combined data as Personal Information which will be used in accordance with this Privacy Notice.

We do not collect any special categories of Personal Information about you (this includes details about your race or ethnicity, religious or philosophical beliefs, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

When you access our Websites, we automatically collect, store and use technical information about your equipment and interaction with our Websites. This information is sent from your computer to us using a variety of cookies.

Read more about our use of cookies and how to disable them [here](#).

How we obtain your Personal Information

We and our service providers collect Personal Information in a variety of ways, including:

Through the Services / Direct interactions	We collect Personal Information through the Services, for example, when you sign up for a newsletter, request Services, register for an event, use Services that can be accessed only by authenticated users who have logged in, participate in a contractual arrangement for or provide information in conjunction with our Corporate Services, or when you interact with us at an event, call our reception desk or otherwise visit one of our offices.
From Other Sources	We receive your Personal Information from other sources, for example: <ul style="list-style-type: none"><input type="checkbox"/> publicly available databases;<input type="checkbox"/> joint marketing partners and event sponsors, when they share the information with us;<input type="checkbox"/> entities to which we provide Corporate Services,<input type="checkbox"/> social media platforms.
Automated technologies or interactions	<p>As you interact with our Websites, we may automatically collect Technical Data about your equipment, browsing actions, and patterns. We collect this Personal Information by using cookies, server logs, and other similar technologies.</p> <p>We may also receive Technical Data about you if you visit other websites employing our cookies.</p>

The purpose and lawful basis on which we use your Personal Information

We will only use your Personal Information when the law allows us to. Most commonly, we will use your Personal Information in the following circumstances:

- To fulfil your applications, including in relation to any of our Services.
- Where we need to perform the contract, we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your Personal Information other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

We have set out below, in a table format, a description of all the ways we use your Personal Information, and which of the legal basis we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your Personal Information for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground, we are relying on to process your Personal Information where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing
<p>To manage our relationship with you which will include:</p> <p><input type="checkbox"/> Notifying you about changes to our terms or Privacy Notice</p>	<p>To manage our relationship with you which will include:</p> <p><input type="checkbox"/> Identity Data</p> <p><input type="checkbox"/> Contact Data</p> <p><input type="checkbox"/> Dubai Business Associates Data</p> <p><input type="checkbox"/> Usage Data</p> <p><input type="checkbox"/> Technical Data</p> <p><input type="checkbox"/> Marketing and Communications Data</p>	<p>To manage our relationship with you which will include:</p> <p>(a) To fulfil your applications, including in relation to any of our Services</p> <p>(b) Performance of a contract with you</p> <p>(c) Necessary to comply with a legal obligation</p> <p>(d) Necessary for our legitimate interests (to keep our records updated and to study how you use our Services)</p>
<p>Managing the goods and services we receive (including contract management, managing security and access to our systems and premises, payment of invoices and assessment of our suppliers or parties who tender to provide goods or services to us)</p>	<p><input type="checkbox"/> Identity Data</p> <p><input type="checkbox"/> Contact Data</p> <p><input type="checkbox"/> Dubai Business Associates Data</p> <p><input type="checkbox"/> Usage Data</p> <p><input type="checkbox"/> Technical Data</p> <p><input type="checkbox"/> Marketing and Communications Data</p>	<p>(a) Necessary to fulfil our obligations to you under our contract with you or (b) to support our legitimate interests in (i) performing a contract with our supplier who you work for or represent (ii) ensuring the protection of our systems and premises and (iii) assessing our suppliers or tenderers, provided such interests are not overridden by the rights and interests of the data subjects concerned</p>
<p>To administer and protect our business and Websites (including troubleshooting, data analysis, testing, system maintenance, support, reporting, and hosting of data)</p>	<p><input type="checkbox"/> Identity Data</p> <p><input type="checkbox"/> Contact Data</p> <p><input type="checkbox"/> Dubai Business Associates Data</p> <p><input type="checkbox"/> Usage Data</p> <p><input type="checkbox"/> Technical Data</p> <p><input type="checkbox"/> Marketing and Communications Data</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to</p>	<p><input type="checkbox"/> Dubai Business Associates Data</p>	<p>(a) Necessary for our legitimate interests (to study how you use</p>

you and measure or understand the effectiveness of the advertising we serve to you	<input type="checkbox"/> Usage Data <input type="checkbox"/> Technical Data <input type="checkbox"/> Marketing and Communications Data	our services, to develop them, to grow our business, and to inform our marketing strategy)
To use data analytics to improve our Websites, Services, marketing, customer relationships, and experiences	<input type="checkbox"/> Dubai Business Associates Data <input type="checkbox"/> Usage Data <input type="checkbox"/> Technical Data	(a)Necessary for our legitimate interests (to define types of customers for our Services, to keep our website updated and relevant, to develop our business, and to inform our marketing strategy)
To make suggestions and recommendations to you about services that may be of interest to you	<input type="checkbox"/> Dubai Business Associates Data <input type="checkbox"/> Usage Data	(a)Necessary for our legitimate interests (to develop our services and grow our business)

How long we keep your Personal Information / data retention

We will retain your Personal Information for as long as we deem necessary or appropriate. We keep your Personal Information for this long so that we can ensure we contact you with information on Services, suggestions, offers and recommendations relevant and appropriate to you. When we have no ongoing legitimate business need to process your Personal Information, we will either delete or anonymise it or, if this is not possible (for example, because your Personal Information has been stored in backup archives), we will securely store your Personal Information and isolate it from any further processing until deletion is possible. We use appropriate technical and organisational measures to protect the Personal Information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your Personal Information.

In some circumstances we may anonymise your Personal Information (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this anonymised information indefinitely without further notice to you.

Sharing your Personal Information

We sometimes share some of your Personal Information with other organisations, namely affiliates or subsidiaries who are bound by similar confidentiality obligations. We also use a number of carefully selected third parties to supply us with products and services. We will only share your Personal Information with our suppliers where it is necessary for them to provide us with the services we need. We also share your Personal Information with relevant public and private entities who are partners of any of our Services or the programs we operate through our Services or who collect information to enable you to apply or work on such programs.

Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your Personal Information in the same way as set out in this Privacy Notice.

We require all third parties to respect the security of your Personal Information and to treat it in accordance with the law. We do not allow our third-party service providers to use your Personal Information for their own purposes and only permit them to process your Personal Information for specified purposes and in accordance with our instructions.

We also use and disclose your Personal Information as necessary or appropriate, especially when we have a legal obligation or legitimate interest to do so. We have set these out in the table below.

<p>To comply with applicable law and regulations</p> <ul style="list-style-type: none"><input type="checkbox"/> This can include laws outside your country of residence.
<p>To cooperate with public and government authorities</p> <ul style="list-style-type: none"><input type="checkbox"/> For example, when we respond to a request or provide information, we believe is important.<input type="checkbox"/> These can include authorities outside your country of residence.
<p>To cooperate with law enforcement</p> <ul style="list-style-type: none"><input type="checkbox"/> For example, when we respond to law enforcement requests and orders or provide information.
<p>For other legal reasons</p> <ul style="list-style-type: none"><input type="checkbox"/> To enforce our terms and conditions; and<input type="checkbox"/> To protect our rights, privacy, safety or property, and/or that of our affiliates, you or others.
<p>In connection with a sale or business transaction</p> <ul style="list-style-type: none"><input type="checkbox"/> We have a legitimate interest in disclosing or transferring your personal information to a third party in the event of any reorganisation, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings) such third parties may include, for example, an acquiring entity and its advisors.

International transfer of your Personal Information

We use trusted and reputable business partners such as Microsoft Azure to store your information and our servers are located in the United Arab Emirates. We may disclose your Personal Information to for the purpose of our internal business processes (such as administration and billing) and for the purpose of providing you with our Services. We will comply with any transfer requirements applicable under local law.

Our partners and third-party service providers and partners operate in the UAE, European Economic Area (the “**EEA**”) and around the world. This means that when we collect your Personal Information it may be processed in countries that may have data protection laws that are different to the laws of your country. Some countries outside of the UAE and EEA are recognised as providing an adequate level of data protection (the full list of these “specified countries” is available [here](#)).

We have taken appropriate safeguards to require that the Personal Information we process will remain protected in accordance with this Privacy Notice when transferred internationally, including when processed internationally by our third-party service providers and partners. Some of the safeguards we have taken include implementing industry standard contractual clauses for transfers of

Personal Information. We have also implemented similar appropriate safeguards with our third-party service providers and partners and further details can be provided upon request.

How we protect your Personal Information / data security

Sending information via the internet is not totally secure. Although we do our best to protect your Personal Information, we cannot guarantee the security of any Personal Information you transmit to our Websites; any transmission is at your own risk. Once we have received your Personal Information, we use generally accepted industry standards and security features to protect your Personal Information and prevent unauthorised access.

We have put in place appropriate security measures, appropriate to the risk, to prevent your Personal Information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your Personal Information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your Personal Information on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected Personal Information breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Your rights regarding your Personal Information

Depending on where you live, you have rights in respect of your Personal Information. These rights may include the right to:

- access your Personal Information
- withdraw your consent to the processing of your Personal information at any time
- ask us to make changes to the Personal Information we hold about you to make sure that it is accurate and up to date
- delete or erase your Personal Information (sometimes called the right to be forgotten)
- stop or restrict our processing of your Personal Information
- object to our processing your Personal Information
- not be subject to automated decision-making; and
- request the transfer of some of the Personal Information we hold about you (known as data portability).

You can also unsubscribe from our emails at any time by clicking on “unsubscribe” at the bottom of the email.

Contact

If you have any questions, concerns, or complaints about the way we process your Personal Information, please contact dataprivacy@falconandassociates.ae. Please note that an archive copy of any information provided to us may be retained by us for our records and for audit purposes. Whilst we would like an opportunity to assist you first, you also have a right to lodge a complaint with a Regulator / supervisory authority.

Updates to this Privacy Notice

Our Privacy Notice may change from time to time, and any changes will be effective when posted. If we make material changes, we will take steps to notify you, such as by posting a notice on our [website](#).