



Junior Golf Scoreboard Privacy Policy, Effective as of February 3, 2021

The website www.juniorgolfscoreboard.com (“Site”) is operated by New Business Associates, Inc. This privacy policy (“Privacy Policy” or “Policy”) describes the current policies regarding collection, use, distribution, protection, and processing of information relating to individuals you share with us. Please read this Policy carefully. A reference to “Junior Golf Scoreboard,” “New Business Associates,” “we,” “us” or “our” is a reference to New Business Associates, Inc. **IF YOU DO NOT AGREE TO THIS PRIVACY POLICY, YOU ARE NOT AUTHORIZED TO USE THIS SITE OR THE CONTENT FOUND ON THIS SITE.**

The Site promotes “The Junior Golf Scoreboard” (“Scoreboard”), which tracks and monitors the sport of competitive junior golf. The Scoreboard lists tournaments, tournament results, player rankings, and information about the sport as well as college recruiting. Premium content is available for sale, which includes golf and academic resume services, subscriptions to view more detailed ranking information, information regarding junior players for college coaches, email address campaigns, golf camp directory listings and enhanced tournament listings (“Services”). New Business Associates sells primarily to businesses based in the United States (“U.S.”) via the Site, and directly to individuals. The Site also promotes related products and services of third parties and contains links to independent websites of these third parties. This Policy applies to the Services we sell and encompasses the data we collect from customers in providing the Services. This Policy also applies to visitors to our Site.

When you use our Site and engage with us for business, you acknowledge that you have read this Policy and understand its contents. Your use of our Services and any dispute over privacy is subject to this Policy and any privacy related terms in applicable agreements with you. If you are a resident of the European Economic Area (“EEA”), you have additional rights, which are explained in this Policy.

INFORMATION COLLECTION, SHARING & CONTROL

We are the sole owners of the information collected on this Site. We only have access to/collect information that you voluntarily give us via email or other direct contact from you.

Information We Collect About You and How We Collect It:

We collect several types of information from and about customers and users of our Site, including: (1) information by which you may be personally identified such as name, postal address, e-mail address, telephone number, financial information such as credit card number and expiration date (“**Personal Information**”); (2) details of your visits to our Site, including equipment, IP address, browsing patterns, traffic data, location data, logs, and other communication data and the resources that you access and use on the Site. Financial information used to process purchases of Services are encrypted in transit and are not saved or stored after processing payment.

How and Why We Collect this Information:

We may collect your information by your use of the Site or in conducting business with you, such as when you:

- Contact us, seek information and/or complete forms on our Site;



- Register - a user is required to give certain information (such as name and email address). This information is used to contact you about the products/services on our site in which you have expressed interest. At your option, you may also provide demographic information (such as gender or age) about yourself, but it is not required.
- Placing orders for Services - We request information from you on our order form. To purchase from us, you must provide contact information (like name and address) and financial information (like credit card number, expiration date). This information is used for billing purposes and to fill your orders. If we have trouble processing an order, we'll use this information to contact you.
- Complete surveys or contests – we gather anonymized information from time to time during surveys or contests. Participation in such activities is voluntary.
- Navigate through our Site - Information gathered through cookies and web server logs may include the date and time of visits, the pages viewed, time spent at our Site, and the web sites visited just before and just after our Site.

Use of Automatic Data Collection Technologies:

The information we collect automatically is statistical data and may include Personal Information, or we may maintain it or associate it with Personal Information we collect in other ways or receive from third parties. This helps us to improve our Site and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns;
- Recognize you when you return to our Site; and
- Keep track of advertisements.

The technologies and services we use for this automatic data collection may include:

- Cookies. A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Site;
- Web Beacons. Pages of the Site and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit New Business Associates, for example, to count users who have visited those pages or opened an email and for other related Site statistics (for example, recording the popularity of certain Site content and verifying system and server integrity);
- Google Analytics. Google Analytics uses cookies, and the information generated by the cookie about your use of the Site will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the Site, compiling reports on Site activity, and providing other services relating to Site activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf.

USE OF COOKIES

We may collect information through the Site by way of cookies. Cookies, along with other tracking technologies, are script files that facilitate the collection of Non-PII (defined below),



such as the number of visitors to the Site, how each visitor arrived at the Site and the visitor’s use and behavior patterns on the Site to ensure a better customer experience. The Site utilizes two types of cookies: (1) Session cookies, which are generated by your browser and comprise temporary files that are erased upon closing your browser. (2) Application cookies, which are a first party cookie generated by the Site.

Non-personally identifiable information (the “Non-PII”) includes any information from which your identity is not readily ascertainable and may include your internet protocol (or “IP”) address, browser, operating system, pages or content you access while visiting the Site and the date and time and duration of such access. In addition to you voluntarily providing us Non-PII, Non-PII is automatically collected through the Site.

Disabling Cookies

You may reject or block cookies or tracking technologies on the Site by adjusting your browser settings. Most browsers offer instructions on how to reset the browser to reject cookies in the "Help" section of the toolbar. If you elect to reject cookies and other tracking technologies, we may not be able to provide the Services and/or the browsing experience may be negatively affected.

Cookies Used with www.juniorgolfscoreboard.com

Cookie	Purpose	Expiration Date
	Filtering of data	12 months from deployment
	Ranking message display indicator	12 months from deployment
	Results message display indicator	12 months from deployment
	Announcement alert indicator	12 months from deployment
	Distinguishes users	12 months from deployment
	Distinguishes users	12 months from deployment
	Event message display indicator	12 months from deployment
	Survey display indicator	12 months from deployment
	Distinguishes users	24 hours from deployment

How We Use and Disclose Your Information

We use information that we collect about you or that you provide to us, including any Personal Information:

- To present our Site and its contents to you;
- To provide customer service and respond to your inquiries in relation to your use of the Site;
- To administer, support (via email or phone), improve, optimize and develop the Site;
- Perform data analyses to determine, among other measurements, business performance and Site performance;
- To fulfill any other purpose for which you provide it; and



- In any other way we may describe when you provide the information and with your consent.

Selling or Transferring Your Personal Information

We will not share your Personal Information with any third party outside of our organization without your consent, other than as necessary to fulfill your request, e.g., to fulfill a subscription request, a request for Services, or as follows:

- If you have opted in to receive communications from us, including marketing and informational emails;
- If you have purchased or subscribed to our “Golf & Academic Resume Services,” your resume, along with its contents, will be accessible via our “Golf and Academic Resume Database”(“Database”). This Database is accessible to college coaches and recruiters who are subscribers to the database.
- To contractors, service providers, and other third parties we use to support our business, who shall be required to maintain such Personal Information in confidence; those contractors include an ISP and a credit card processing company. These companies do not retain, share, store or use your Personal Information for anything other than to process your order;
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of New Business Associates’ assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by New Business Associates about our Site users is among the assets transferred;
- For any other purpose disclosed by us when you provide the information;
- With your consent;
- To comply with any court order, law, or legal process, including to respond to any government or regulatory request;
- To enforce or apply our Terms of Use; and
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of New Business Associates, our customers, or others.

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

Your Choices, Access, Correction and Deletion

How can I control the cookie preferences?

Should you decide to change your preferences later through your browsing session, you can click on the “Privacy & Cookie Policy” link on the bottom of your screen. This will display the consent notice again enabling you to change your preferences or withdraw your consent entirely.

The “Help” section of your browser toolbar will inform you how to have notifications enabled when a new cookie is received, to prevent your browser from accepting a new cookie, or from disabling the use of cookies completely. Disabling cookies completely may cause the Site’s features not to function as intended. Some browsers permit enablement of a “Do Not Track” feature. We honor this feature and do not track, plant cookies, or use advertising when this



mechanism is in place. New Business Associates also does not permit third party behavioral tracking.

In addition, different browsers provide different methods to block and delete cookies used by Sites. You can change the settings of your browser to block/delete the cookies. To find out more out more on how to manage and delete cookies, visit wikipedia.org, www.allaboutcookies.org.

Consent and Control

To process your Personal Information, we typically rely upon your consent, contract performance, our legitimate business interest, or compliance with law. You may object to or restrict our processing of your Personal Information. You may withdraw any prior consent you may have given to process Personal Information at any time. It is also within your rights to refuse to provide any Personal Information we request. However, refusal to provide certain Personal Information may limit your access to information or certain areas of the Site.

Should you wish to access or amend any Personal Information you may have provided us or if you wish to request deletion, please contact mact@juniorgolfscoreboard.com or 804-935-1800. Your Personal Information will be deleted or blocked from our database at your request.

How Long Do We Keep Your Personal Information?

We may retain your Personal Information for a period of time consistent with the original purpose of collection (see the “How We Use and Disclose Your Information” section, above) or as long as required to fulfill our legal obligations. We determine the appropriate retention period for Personal Information on the basis of the amount, nature, and sensitivity of the Personal Information being processed, the potential risk of harm from unauthorized use or disclosure of the Personal Information, whether we can achieve the purposes of the processing through other means, and on the basis of applicable legal requirements (such as applicable statutes of limitation). After expiry of the applicable retention periods, your Personal Information will be deleted. If there is any data that we are unable, for technical reasons, to delete entirely from our systems, we will implement appropriate measures to prevent any further use of such data. For more information on data retention periods, please contact us by using the information in the “Contacting Us” section, below.

THIRD PARTY INFORMATION ON THE SITE

Links to Third Party Sites and Advertisers

The Site contains links to other Sites on the Internet that are owned and operated by third parties. New Business Associates does not control the information, products, or services available on or through these third-party websites. The inclusion on the Site of a third-party link does not imply endorsement by New Business Associates of the applicable website or any association with the Site’s operators. Because New Business Associates has no control over such websites, you agree that New Business Associates is not responsible or liable for the availability or the operation of such websites, for any material located on or available through such websites, or for the data



practices of such websites, which shall be subject to those websites' policies and terms. If you click on any third-party advertisements on the Site, participate in any promotions offered by such advertisers, or purchase any goods or services from such advertisers, any terms, conditions, warranties, or representations associated with such dealings or promotions are solely between you and the applicable advertiser or other third party, and you agree that New Business Associates shall not be responsible or liable, directly or indirectly, for any loss or damage you suffer through your dealings with or based on your reliance on any material made available by such advertisers.

SECURITY

We have implemented industry-standard measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration, and disclosure. Unfortunately, the transmission of information via the internet is not completely secure. Further, whenever we collect sensitive financial information (such as credit card data), that information is encrypted and transmitted to us in a secure way. You can verify this by looking for a closed lock icon at the bottom of your web browser, or looking for "https" at the beginning of the address of the web page. While we use encryption to protect sensitive information transmitted online, we also protect your information offline. Only employees who need the information to perform a specific job (e.g. billing or customer service) are granted access to personally identifiable information. The computers/servers on which we store personally identifiable information are kept in a secure environment.

Although we do our best to protect your Personal Information, We cannot guarantee the security of your Personal Information transmitted to our Site. Any transmission of Personal Information is at your own risk. we are not responsible for circumvention of any privacy settings or security measures contained on the Site.

RIGHTS OF CERTAIN TYPES OF USERS

Subject to local law, you may have certain rights with regard to your Personal Information. To learn more about the Personal Information we collect about you or the rights you may have, please contact us at the contact information below. These rights may include the following rights to (1) access or rectify your Personal Information or request its deletion, (2) request a restriction on the processing of your Personal Information, (3) object to the processing of your Personal Information, or (4) exercise other rights with respect to your Personal Information. Please contact us as described below. While we strongly encourage you to first raise any questions or concerns about your Personal Information directly with us, you may have a right to lodge a complaint with the relevant supervisory authority.

1. EEA/EUROPEAN UNION (EU) - GDPR

New Business Associates' headquarters and offices are in the U.S. However, we do receive EU Personal Information directly from individuals. For clients in the European Union ("EU"), where data collections specifically apply to them, New Business Associates complies with the EU General Data Protection Regulation **2016/679/EU** ("GDPR") as set forth by the EU regarding the collection, use, and retention of Personal Information from the EU member countries and



Switzerland. If you are a European resident or considered a Data Subject under GDPR, you have the following rights:

Rights under GDPR
1) Right to withdraw consent to the processing of Personal Information at any time.
2) Right to object to the processing of Personal Information if the processing is carried out on a legal basis other than consent.
3) Right to learn if Personal Information is being processed by New Business Associates, obtain disclosure regarding certain aspects of processing, and obtain a copy of the Personal Information undergoing processing. (New Business Associates reserves the right to charge you a small but reasonable fee for this service, if requests are unfounded, repetitive, or excessive.)
4) Right to verify the accuracy of Personal Information and ask for it to be updated or corrected.
5) Right, under certain circumstances to restrict the processing of Personal Information. In this case, New Business Associates will not process Personal Information for any purpose other than storing it.
6) Right to receive Personal Information in a structured, commonly used, machine-readable format and, if technically feasible, to have it transmitted to another controller without any hindrance. This provision is applicable provided that the Personal Information is processed by automated means and that the processing is based on your consent, on a contract which you are a part of or on pre-contractual obligations thereof.
7) Right to bring a claim before your competent data protection authority (DTA).

2. CALIFORNIA PRIVACY RIGHTS (CCPA)

We abide by California law where applicable for any California residents using our Site. You can request access to and/or revision of certain Personal Information by contacting us as described below. If you wish to limit the emails you receive from us, you can let us know by contacting us. California residents can make certain requests about their Personal Information under the California Consumer Privacy Act (“CCPA”). While New Business Associates is not currently a business that falls under the CCPA, we are informing you of your general rights under that law. Specifically, if you are a California resident, you may request that we:

1. provide you with information about: the categories of Personal Information we collect, disclose or sell about you; the categories of sources of such information; the business or commercial purpose for collecting or selling your Personal Information; and the categories of third parties with whom we share Personal Information. Such information is also set forth in this Policy;
2. provide access to and/or a copy of certain information we hold about you;
3. delete certain information we have about you; and/or
4. provide you with information about the financial incentives that we offer to you, if any.

California residents can also designate an authorized agent to make access and/or deletion requests on their behalf. We will take reasonable steps to verify your identity before responding to a request for access and/or deletion from you or your designated agent. The CCPA further



provides you with the right to not be discriminated against (as provided for in applicable law) for exercising your rights. Please note that certain information may be exempt from such requests under California law.

If you are a California resident and would like to exercise any of legal rights under the CCPA, please contact us at mac@newbusassoc.com.

The CCPA also sets forth certain obligations for businesses that “sell” personal information. Pursuant to the definition of “sell” under the CCPA and current guidance, we do not engage in such activity and have not engaged in such activity in the past twelve months, including for minors under the age of sixteen.

If you are a California resident, California law requires us to provide you with information regarding how we collect, use, and share your “personal information” (as defined in the CCPA). We describe the categories of information we collect, our business purposes for collecting such information, the sources and uses of such information and the entities to which we share such information in this Policy above.

3. CHILDREN’S POLICY

The Site is not directed to children. We do not knowingly collect Personal Information from children under the age of 18 unless (a) we have obtained consent from a parent or guardian, (b) such collection is subject to a separate agreement with us or (c) the visit by a child under the age of 16 is unsolicited or incidental. If you are a parent or guardian and believe your child has provided us with Personal Information without your consent, please contact us by using the information in the “Contacting Us” section below and we will take steps to delete their Personal Information from our systems.

Telephone/Text – New Business Associates seeks your consent before contacting you. Specifically, by opting in to receive communications from us when you purchase a subscription for any Service, you are authorizing New Business Associates and/or its service providers to contact you at the number you listed via phone or text (SMS), including (as necessary) using automated dialing technology, for marketing or advertising purposes, or regarding your business with us.. No agreement or signature is required for you to receive the services. Separate message and data rates may apply. To opt-out at any time you may reply STOP to any New Business Associates text message. We acknowledge that this consent may be revoked at any time, but that until such consent is revoked, you may receive calls and text (SMS) messages from New Business Associates.

Email/Fax – New Business Associates seeks your consent before contacting you. Specifically, by providing your contact information and clicking the box labeled Subscribe where you provide your contact information, you are authorizing New Business Associates and/or its service providers to contact you via email or fax. We may collect and send you email for the following purposes but will always accurately identify ourselves and use truthful and accurate subjects and information.

- Send general information and answer questions and queries.
- Provide sales updates and information.



- Engage in marketing activities.
- Determine collaboration or partnership interest/opportunities of mutual interest.

We have provided an “Opt out” link at the bottom of any such email or communication and will promptly fulfill your request to opt-out/unsubscribe to these communications.

REQUESTS, RECOURSE, ENFORCEMENT, AND LIABILITY

Complaints and issues directed to New Business Associates will be responded to promptly, especially with regard to any data breach, but in any event within 30 days of receipt. New Business Associates will investigate any complaints and issues, attempting to promote expedited resolution. Also, to 1.) escalate any issue or complaint; 2.) a data access request for yourself; 3.) submit a data access request on behalf of another individual; or 4.) dispute or appeal a prior data access request please contact mac@busassoc.com or call 804-935-1800.

POLICY CHANGES

We reserve the right to amend this privacy policy at any time with or without notice. However, please be assured that if the Privacy Policy changes in the future, we will not use the personal information you have submitted to us under this Privacy Policy in a manner that is materially inconsistent with this Privacy Policy, without your prior consent. If you have any questions regarding this Policy, or your dealings with our Site, please contact us here.

CONTACTING US

To exercise your rights regarding your Personal Information, or if you have questions regarding this Privacy Policy or our privacy practices please email us at mac@newbusassoc.com, call us at 804-935-1800, or write to us at:

New Business Associates
4510 Cox Road, Suite 303
Glen Allen, Virginia 23060 USA