

## SwingMatch Golf Inc.

### PRIVACY POLICY

**Updated October 7, 2025. This Privacy Policy may be modified to be kept up to date**

At SwingMatch Golf Inc., our Site (app.swingmatch.ca) does not collect personal information and we only collect business contact information from our clients. Our clients using our solutions may input personal information on our systems, which we keep secure.

All personal information at SwingMatch Golf Inc. is collected with consent when individuals seek our services or through contracts when clients use our solutions as their information infrastructure.

We do not sell any personal information.

#### **Data Processing and User Rights**

SwingMatch Golf Inc. complies with all applicable laws and regulations in the collection, processing, and management of personal data. This includes:

1. **What Data We Process:** We process user-provided personal information such as names, email addresses, phone numbers, payment information, profile photos, lesson logs, and communication logs to facilitate the functionality of our services.
2. **How we Process Data:** Personal data is collected with consent and processed securely to provide the requested services, maintain user accounts, and enhance user experiences. Data is only accessed by authorized personnel under strict confidentiality measures.
3. **Purposes of Data Processing:**
  - a. Facilitate golf lesson bookings and communication.
  - b. Process and confirm payments via third-party providers.
  - c. Respond to user inquiries and provide support.
  - d. Send promotional updates with explicit user consent.
4. **Photo and Video Sharing:** Users may upload or share photos, videos, or lesson recordings through the Site. By sharing this content, you confirm that you have the necessary rights and permissions to do so. SwingMatch Golf Inc. processes and stores this media securely facilitate lesson feedback, communication, and related services. We will only use user media for promotional purposes with prior consent. You may remove any media directly through the Site or request removal of your uploaded content by contacting us at [swingmatch.info@gmail.com](mailto:swingmatch.info@gmail.com).

#### **Analytics and Advertising Features**

We use Google Analytics to understand how our services are used and to improve the user experience. If you consent, we may enable **Google Analytics Advertising Features**, which allow us to:

- Collect demographic and interest information (such as age ranges, gender, and interests).
- Understand how users engage with our ads across different platforms.

- Build audiences for remarketing campaigns and measure ad performance.

These features rely on cookies and similar technologies that may combine first-party information (from SwingMatch Golf Inc.) with third-party information (from Google or advertising partners).

You may opt out of these features at any time by:

- Adjusting your preferences in [Google Ads Settings](#).
- Installing the [Google Analytics Opt-out Browser Add-on](#).

We do not merge personally identifiable information (such as names, emails, or payment data) with Google Analytics data unless you have provided explicit consent.

We partner with **Microsoft Clarity** and **Microsoft Advertising** to capture how you use and interact with our website through behavioral metrics, heatmaps, and session replay to improve and market our products/services. Website usage data is captured using first and third-party cookies and other tracking technologies to determine the popularity of products/services and online activity. Additionally, we use this information for site optimization, fraud/security purposes, and advertising. For more information about how Microsoft collects and uses your data, visit the [Microsoft Privacy Statement](#).

### **Cookies & Consent**

SwingMatch Golf Inc. uses cookies and similar technologies to provide core functionality (such as secure log-in and bookings). With your consent, we may also use cookies for analytics and advertising purposes.

- Essential cookies are required for the Site to function and cannot be disabled.
- Non-essential cookies (analytics and advertising) are only used with your consent and may be disabled at any time through your browser settings or our cookie banner.

### **User Rights to Data Deletion**

Users may request the deletion of their personal data at any time by contacting us at [swingmatch.info@gmail.com](mailto:swingmatch.info@gmail.com). We will process deletion requests within 30 days unless retention is required for legal purposes (e.g., tax compliance). Users will receive confirmation upon successful deletion.

### **User Rights to Data Modification**

Clients may request access to or ask to edit their personal information that we collect and maintain by contacting us at [swingmatch.info@gmail.com](mailto:swingmatch.info@gmail.com). We will respond within 30 days. If we cannot provide access, for example because it would disclose personal information of a third person, we will provide justification.

### **How we protect personal information at SwingMatch Golf Inc.**

1. We do not collect any personal information from Site visits alone.

2. We collect personal information from clients when they create an account on the Site. Information collected is used to allow the application to function as an online booking service for golf lessons. This will include phone numbers, payment amounts and status, names, emails, profile photos, lesson logs, and internal chat logs between users that occur on the Site.
3. We collect personal information clients provide us when they contact us, including first and last name as well as the email address and phone number for us to respond to inquiries and keep users up to date on their booked lessons. With consent, we may send promotional emails from SwingMatch Golf Inc. to keep our clients informed of our developments and new products and services. You may unsubscribe by emailing [swingmatch.info@gmail.com](mailto:swingmatch.info@gmail.com), or within the communication itself. Transactional communications (lesson updates, billing receipts) will still be sent.
4. All payments are handled through Stripe, SwingMatch Golf's third-party payment processor. Stripe's Terms and Conditions can be found here: [Stripe Terms and Conditions](#).
5. In addition to Stripe, SwingMatch Golf Inc. may use trusted third-party service providers to support our operations. These may include providers for cloud hosting, analytics, customer communications, and media storage. We ensure these providers process personal information only as necessary to deliver their services and under contractual obligations to maintain appropriate privacy and security protections.

#### **Where and how long we keep personal information**

We generally hold personal information on secure servers located in Canada. In some cases, personal information may be stored or processed in the United States. When information is stored in the U.S., it is subject to U.S. laws, which may permit government authorities to access it in certain circumstances.

We only retain personal information as long as necessary to provide our services or as required by applicable Canadian or U.S. law (for example, for tax or accounting purposes).

#### **How we keep personal information secure**

The security of personal information is important to us. Although we cannot guarantee 100% security, we use reasonable and appropriate security measures to protect personal information against unauthorized use, loss, access, modification, destruction or disclosure while it is in our custody or under our control. These measures include physical, organizational and technological measures. Physical measures include secure work areas, and technological measures include encryption, firewalls, anti-virus and system security monitoring. Organizational measures include access controls to limit access to personal information to those employees, contractors and agents who have a business need to know.

#### **We do not disclose personal information**

We do not disclose any information in our custody to third parties unless it is with consent or required by law.

#### **Data Breach Procedure**

If a data breach occurs on the Site, all users will be notified of the breach once the SwingMatch Golf has been made aware that a breach has occurred. In the event a breach occurs, SwingMatch Golf will inform its users of the action plan to further mitigate the risks.

### **Children's Policy**

Our services are not directed to children under the age of 13. We do not knowingly collect personal information from minors without parental consent. If we become aware that we have inadvertently collected personal information from a minor without appropriate consent, we will take steps to delete such information promptly. Parents or guardians who believe their child has provided personal information may contact us at [swingmatch.info@gmail.com](mailto:swingmatch.info@gmail.com).

### **Consent**

By creating an account and/or consenting to cookies via our cookie banner, you agree to the collection and processing of your information as described in this Privacy Policy.

### **Questions and contact information**

For individual requests to access personal information or to express concerns about protection of personal information at SwingMatch Golf Inc., please contact [swingmatch.info@gmail.com](mailto:swingmatch.info@gmail.com).

Complaint mechanisms also exist with national privacy authorities.