

## PRIVACY POLICY

Last Updated: July 1, 2026

### 1. WHO WE ARE

Welcome to College Golf Pathway, a Division of Golf Tier System LLC (“we,” “us,” “our”). We are based in the United States and work with our associated partner entities in Canada (each an independent legal entity, collectively referred to as “Affiliates” or “Associated Partners”):

- Golf Tier System LLC (Wyoming, USA)
- Zone Golf Pathway LLC (Nevada, USA)
- Zone Golf Academy, a ZGA Holdings Inc Company (British Columbia, Canada)

Each entity operates independently under its own legal structure. Together, as associated partners, we deliver golf training programs, university placement services, camps, tournaments, events, consulting, online courses, and products worldwide.

Primary Website: <https://collegegolfpathway.com>

Contact Information:

- Email: [info@mg.golftiersystem.com](mailto:info@mg.golftiersystem.com)
- Address: 30 N Gould St Ste 63743, Sheridan, WY 82801 U.S.A.

### 2. INFORMATION WE COLLECT

We may collect the following types of personal information:

Personal Identifiers:

- Name, email address, phone number, mailing address
- Date of birth (for age-appropriate program placement)
- Emergency contact information (for camps and events)

Payment & Financial Data:

- Billing details and payment information (securely processed by third-party payment processors)
- Transaction history and purchase records

Technical & Usage Data:

- IP address, browser type, device information
- Cookies, web beacons, and similar tracking technologies
- Website browsing activity, pages visited, time spent on site
- Referral sources (how you found our website)

#### Communications Data:

- Email correspondence and interactions
- SMS/text message interactions
- Phone call records (for customer service)
- Chat or messaging interactions

#### Program & Service Data:

- Registration information for camps, academies, tournaments, and events
- Skill assessments and performance evaluations
- University placement preferences and academic information
- Program feedback and surveys
- Online course progress and completion data

#### Marketing & Preferences:

- Communication preferences (email, SMS opt-ins)
- Areas of interest
- Event attendance history

### 3. HOW WE COLLECT YOUR INFORMATION

We collect information through various methods:

#### Directly From You:

- When you complete registration or contact forms
- When you create an account on our websites
- When you purchase products or services
- When you subscribe to newsletters or updates
- When you participate in surveys or provide feedback
- When you communicate with us via email, phone, or chat

#### Automatically:

- Through cookies and tracking technologies when you visit our websites
- Via analytics tools that monitor website usage
- Through advertising pixels and retargeting technologies

#### From Third Parties:

- From our affiliated partner entities during cross-promotional activities
- From social media platforms when you interact with our content
- From payment processors regarding transaction completion
- From referral partners or coaches who recommend our services

#### With Your Consent:

- When you opt-in to receive email newsletters
- When you opt-in to receive SMS/text message updates
- When you consent to cookies via our cookie consent banner

#### 4. HOW WE USE YOUR INFORMATION

We use your personal information for the following purposes:

##### Service Delivery:

- Register you for programs, camps, tournaments, and events
- Process payments and fulfill orders
- Provide customer support and respond to inquiries
- Deliver online courses and digital products
- Coordinate university placement consulting services • Communicate important updates about your registrations

##### Marketing & Communications (With Your Consent):

- Send promotional emails about programs, events, and special offers
- Send SMS/text message updates and reminders
- Provide personalized recommendations based on your interests
- Notify you about new programs or services

##### Advertising & Analytics:

- Run retargeting and online advertising campaigns
- Analyze website performance and user behavior
- Improve our programs and services based on feedback
- Conduct market research and analyze trends

##### Legal & Security:

- Comply with legal obligations and regulations
- Protect against fraud, abuse, and security threats
- Enforce our Terms & Conditions
- Respond to legal requests and prevent illegal activity

##### Operational Coordination:

- Share information between affiliated partner entities to coordinate services
- Facilitate cross-promotional events and programs
- Maintain consistent customer records across platforms

#### 5. COOKIES & TRACKING TECHNOLOGIES

We use cookies, pixels, web beacons, and similar tracking technologies for:

#### Essential Cookies:

- Enable core website functionality
- Remember your preferences and settings
- Maintain security and prevent fraud

#### Performance & Analytics Cookies:

- Track website performance and usage
- Understand how visitors interact with our site
- Identify technical issues

#### Marketing & Advertising Cookies:

- Deliver targeted advertisements
- Retarget visitors who have shown interest
- Measure advertising campaign effectiveness
- Track conversions and ROI

#### Third-Party Cookies:

- Google Analytics (website analytics)
- Facebook Pixel (advertising and retargeting)
- Other advertising networks and analytics providers

#### Your Cookie Choices:

- Manage your cookie preferences through our cookie consent banner (powered by Complianz or similar)
- Adjust your browser settings to block or delete cookies
- Note: Blocking essential cookies may affect website functionality

## 6. HOW WE SHARE YOUR INFORMATION

We may share your personal information in the following circumstances:

#### With Affiliated Partner Entities:

- Information may be shared between Zone Golf Academy, Inc., Golf Tier System, LLC, and Zone Golf Pathway, LLC for operational coordination, cross-promotional programs, and service delivery
- Each entity remains an independent legal entity with its own data practices

#### With Service Providers:

- Email marketing platforms (e.g., MailChimp, Constant Contact, GoHighLevel)
- SMS/text messaging services
- Payment processors (e.g., Stripe, PayPal)
- Website hosting and cloud storage providers

- Customer relationship management (CRM) systems
- Analytics and data analysis tools

With Advertising Partners:

- Social media advertising platforms (Facebook, Instagram, LinkedIn)
- Google Ads and retargeting networks
- Advertising agencies and marketing consultants

As Required by Law:

- To comply with legal obligations, court orders, or government requests
- To protect the rights, property, or safety of our company, customers, or others
- In connection with legal proceedings or investigations

Business Transfers:

- In the event of a merger, acquisition, sale of assets, or similar transaction, your information may be transferred to the acquiring entity

With Your Consent:

- When you explicitly authorize us to share information with specific third parties

We Never Sell Your Data:

- We do not sell, rent, or trade your personal information to third parties for their marketing purposes

## 7. YOUR PRIVACY RIGHTS

Your rights vary depending on your location and applicable privacy laws:

General Rights (All Users):

- Access: Request a copy of the personal information we hold about you
- Correction: Request that we correct inaccurate or incomplete information
- Deletion: Request that we delete your personal information (subject to legal retention requirements)
- Opt-Out of Marketing: Unsubscribe from promotional emails and SMS messages at any time

Email Opt-Out:

- Click the “unsubscribe” link in any promotional email
- Email us at [info@mg.golftiersystem.com](mailto:info@mg.golftiersystem.com) with “Unsubscribe” in the subject line

SMS/Text Opt-Out:

- Reply “STOP” to any text message
- Text messages are only sent to users who have explicitly opted in

Cookie Opt-Out:

- Manage preferences through our cookie consent banner
- Adjust your browser settings to block cookies
- Use opt-out tools provided by advertising networks (e.g., NAI Opt-Out, DAA WebChoices)

#### Canadian Residents (PIPEDA):

- Right to access personal information held by us
- Right to challenge the accuracy and completeness of your information
- Right to file a complaint with the Privacy Commissioner of Canada

#### California Residents (CCPA/CPRA):

- Right to know what personal information we collect, use, disclose, and sell
- Right to delete personal information (with exceptions)
- Right to opt-out of the sale of personal information (we do not sell data)
- Right to non-discrimination for exercising privacy rights

#### European Union/UK Residents (GDPR/UK GDPR):

- Right to access, rectify, erase, restrict processing, and data portability
- Right to object to processing based on legitimate interests
- Right to withdraw consent at any time
- Right to lodge a complaint with a supervisory authority

#### How to Exercise Your Rights:

- Email: [info@mg.golftiersystem.com](mailto:info@mg.golftiersystem.com)
- Subject Line: "Privacy Rights Request"
- Include: Your full name, email address, and specific request
- Response Time: We will respond within 30 days (or as required by applicable law)

## 8. INTERNATIONAL DATA TRANSFERS

Our operations span multiple countries, and your personal information may be transferred to and processed in:

- Canada (where Zone Golf Academy, Inc. is based)
- United States (where Golf Tier System entities operate)
- Other jurisdictions where our service providers are located

#### Data Protection Standards:

- We take appropriate measures to ensure your data is protected in accordance with applicable privacy laws
- Transfers are conducted using standard contractual clauses, adequacy decisions, or other lawful transfer mechanisms
- Your information receives the same level of protection regardless of location

#### Cross-Border Considerations:

- Different countries have different privacy laws and standards
- By using our services, you acknowledge and consent to international data transfers
- You have the right to obtain information about transfer mechanisms upon request

#### 9. DATA RETENTION & SECURITY How

##### Long We Keep Your Data:

- Active Customer Data: Retained while you remain an active customer or participant
- Transactional Data: Retained for accounting and tax purposes (typically 7 years)
- Marketing Data: Retained until you opt-out or request deletion
- Legal Requirements: Some data must be retained to comply with legal obligations • Upon

Request: We will delete your data when requested, subject to legal exceptions Security

##### Measures We Use:

##### Technical Safeguards:

- Encryption of data in transit and at rest
- Secure socket layer (SSL) technology for website connections
- Firewalls and intrusion detection systems
- Regular security audits and vulnerability assessments

##### Administrative Safeguards:

- Employee training on data privacy and security
- Access controls limiting who can view personal information
- Confidentiality agreements with employees and service providers

##### Physical Safeguards:

- Secure facilities and restricted access to physical records
- Secure disposal of physical documents containing personal information

##### Limitations:

- No method of transmission or storage is 100% secure
- We cannot guarantee absolute security of your information
- You are responsible for maintaining the confidentiality of your account credentials

#### 10. CHILDREN'S PRIVACY

##### Age Requirements:

- Our services are primarily intended for junior golfers (minors under 18)
- Registration for minors must be completed by a parent or legal guardian
- We do not knowingly collect personal information directly from children under 13 without parental consent

#### Parental Consent & Control:

- Parents/guardians provide all personal information for minor participants
- Parents/guardians have the right to access, correct, or delete their child's information
- Parents/guardians can opt their child out of marketing communications
- Parents/guardians consent to the use of their child's information as described in this policy

#### Compliance:

- We comply with applicable laws regarding children's privacy, including COPPA (U.S.) and similar regulations
- If we become aware that we have collected information from a child under 13 without proper parental consent, we will take steps to delete it

### 11. THIRD-PARTY WEBSITES & SERVICES

Our websites may contain links to third-party websites, social media platforms, or services (e.g., payment processors, registration platforms).

#### Important Notices:

- We are not responsible for the privacy practices or content of third-party websites
- Third-party sites have their own privacy policies that govern their data practices
- We encourage you to review the privacy policies of any third-party sites you visit
- Your interactions with third parties are subject to their terms and policies

#### Examples of Third-Party Services:

- Payment processors (Stripe, PayPal, etc.)
- Social media platforms (Facebook, Instagram, LinkedIn)
- Email marketing platforms
- Online course platforms
- Video hosting services (YouTube, Vimeo)

### 12. UPDATES TO THIS PRIVACY POLICY

We may revise this Privacy Policy from time to time to reflect:

- Changes in our data practices
  - New legal requirements or regulations
  - New services or features we offer
  - Feedback from customers or regulators
- Notice of Changes:
- We will update the "Last Updated" date at the top of this policy
- For material changes, we may provide additional notice via email or prominent website notice
- Continued use of our services after changes constitutes acceptance of the updated policy

- We encourage you to review this policy periodically

### 13. HOW TO CONTACT US

If you have questions, concerns, or requests regarding this Privacy Policy or our data practices, please contact us:

College Golf Pathway / Golf Tier System (USA)

- Email: [info@mg.golftiersystem.com](mailto:info@mg.golftiersystem.com)
- Website: <https://collegegolfpathway.com>
- Phone: +18449354653
- Address: 30 N Gould St, Ste 63743, Sheridan, WY 82801, U.S.A.

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BY USING OUR SERVICES OR WEBSITES, YOU ACKNOWLEDGE THAT YOU HAVE READ, UNDERSTOOD, AND AGREE TO THIS PRIVACY POLICY.

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