

ARCHIVED VERSION. This is the Topgolf Global Privacy Notice effective May 13, 2026. It was superseded by the version effective October 5, 2026. Retained for reference only.

Privacy Notice

Our Privacy Notice has been updated and is effective **May 13, 2026** (the “Effective Date”).

Previous versions of our privacy notice can be found [here](#).

Welcome to Topgolf! We are a sports entertainment company offering inclusive, high-tech golf experiences that everyone can enjoy.

This Privacy Notice (“Privacy Notice”) applies to our processing of personal data collected through our branded physical locations, including our on-site kiosks (“Locations”), our websites (“Websites”), mobile applications, including the Topgolf application, and Toptracer Range application (collectively, the “Apps”), and other Topgolf products and services, including Toptracer Coach, the Toptracer Range Management System, and Toptracer Range services (collectively with the Locations, Websites, and Apps, the “Topgolf Offerings”), owned and operated by Topgolf International, LLC, and its subsidiaries and affiliates (collectively “Topgolf,” “we,” “our,” or “us”). Please refer to the [Region-Specific Notices section below](#) for additional disclosures that may be applicable to you.

Please review this Privacy Notice, the relevant Region-Specific Notices and any of our applicable Terms and Conditions carefully. To the extent legally permitted, your use of the Topgolf Offerings, including any purchase of any products or services, signifies you have read and understood this Privacy Notice and agree to the Terms and Conditions.

This Privacy Notice is not a contract and does not create any legal rights or obligations not otherwise provided by law. This Privacy Notice does not address our privacy practices relating to Topgolf job applicants, employees and other employment-related individuals, nor data that is not subject to applicable data protection laws (such as deidentified, aggregated, or publicly available information). This Privacy Notice is also not a contract and does not create any legal rights or obligations not otherwise provided by law.

Our Role in Processing Personal Data

Data protection laws sometimes differentiate between “controllers” and “processors” of personal data. A “controller” determines the purposes and means (the why and how) of processing personal data. A “processor,” which is sometimes referred to as a “service provider,” processes personal data on behalf of a controller subject to the controller’s instructions.

This Privacy Notice describes our privacy practices where we are acting as the controller of personal data. However, this Privacy Notice does not cover or address how our customers (other companies – for example, facilities deploying Topgolf products or services) may process personal data when they use our services, or how we may process personal data on their behalf in accordance with their instructions where we are acting as their processor. For example, when you attend a third-party driving range, their privacy practices may differ from the ones we outline in this notice. As a result, we recommend referring to the privacy notice of the customer with which you have a relationship for information on how they engage processors, like us, to process personal data on their behalf.

In general, controllers have a copy of their privacy notice on their website, or you can contact them directly to ask for the latest copy. In addition, we are generally not permitted to respond to individual requests relating to personal data we process on behalf of our customers, so we recommend directing any requests to the relevant customer.

Please see the [Contact Us](#) section of this Privacy Notice for more information about our legal entities operating as the controllers of your personal data.

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1. OUR COLLECTION OF PERSONAL DATA

The categories of personal data we collect depend on how you interact with us. For example, you may provide us your personal data directly when you register for an account, make reservation, post a review, participate in an event, contest, promotion or survey, or otherwise contact us. We also collect personal data automatically when you interact with the Topgolf Offerings, including our websites and other services, and we may also collect personal data from other sources and third parties.

Note that this Privacy Notice does not address our privacy practices relating to data that is not personal data or otherwise subject to applicable data protection laws (such as de-identified or publicly available information). We may de-identify personal data so that it is non-personal, such as by aggregating or masking it. We maintain and use de-identified data without attempting to re-identify it, except where permitted by applicable law, such as to determine whether our de-identification processes satisfy legal requirements. We will treat de-identified data as non-personal to the extent allowed by applicable law. If we combine data that we consider to be non-personal with personal data, we will treat that combined data as personal data under this Privacy Notice.

Personal Data Provided by Individuals

We collect the following categories of personal data individuals provide us:

- **Contact Information.** This may include your first and last name, phone numbers, email address, and billing and shipping addresses. This may also include your social media handle.
- **Payment Information.** This may include your credit or debit card number, billing address, expiration date, and other payment data. Please note that we use third-party payment providers to process payments made to us. We do not retain any payment card data directly, as you provide these third-party payment processors in connection with transactions. The payment provider's use of your personal data is governed by their privacy notice. You can identify the payment provider by reviewing the logo on the point-of-sale device or application, or by contacting us using the information in the Contact Us section below.
- **User Account Information.** This may include information such as username, password, security questions and answers, stance, skill level, home range, year of birth, gender and settings.
- **Transaction Information.** This may include data about the products and services you purchased and considered; your reservations, returns, exchanges, and cancellations; when and where you ordered or received the products and services; and survey, sweepstake or contest participation.
- **Information About Your Interests, Preferences, and Performance.** This may include information derived from interactions with the Topgolf Offerings, including your searches or your posts to a community forum; your gameplay performance at Topgolf Offerings; the date you visited a Topgolf facility; which game(s) you played; how long you stayed at a Topgolf facility; how many balls you hit during your gameplay; game activity; game scores. This could include information about your activity level, golf game, and buying preferences.

- **Demographic Data.** This may include your age, date of birth, sex and/or gender, marital status, zip code.
- **Government Identification.** Such as your social security number or other government-issued ID. We may collect this information for the purposes of identity and age verification or for tax purposes. For example, we may need to collect this information if you win a contest or sweepstakes.
- **Photo/Video Data.** We allow you to post photos and videos on the Topgolf Offerings or to submit them to us. For additional information, please see our Terms and Conditions.
- **User Generated Content.** This may include your profile picture; images, audio recordings, video recordings, or text that you submit in connection with product reviews, survey responses, customer service interactions, or your resume and cover letter.
- **Professional Information.** Including job title, company name, professional background, and the nature of your relationship with us. We use this information primarily to fulfill your request or transaction, to determine how we communicate with you, to administer your account, to provide you with our services, and for customer support purposes.
- **Health Data.** Including allergy information, medical assistance information, body compensation data, swing data, special accommodations information and similar. For example, we may allow you to share swing or body compensation data with us through video recordings made as part of your golf lessons.

If you choose to contact us, we may need additional information to fulfill the request or respond to your inquiry. We may provide additional privacy disclosures where the scope of the request we receive or personal data we require fall outside the scope of this Privacy Notice. In that case, the additional privacy disclosures will govern how we may process the information you provide at that time.

Personal Data Automatically Collected

We, and our third-party partners, automatically collect information you provide to us and information about how you access and use our products and services when you engage with us. We typically collect this information through the use of a variety of our own and our third-party partners' automatic data collection technologies, including (i) cookies or small data files that are stored on an individual's computer and (ii) other, related technologies, such as web beacons, pixels, embedded scripts, mobile SDKs, location-identifying technologies and logging technologies. Information we collect automatically about you may be combined with other personal data we collect directly from you or receive from other sources.

We, and our third-party partners, use automatic data collection technologies to collect the following data when you access the Topgolf Offerings or otherwise engage with us:

- **Device Information.** This may include your IP address, mobile device identifier and other unique identifier, and device information (including device model, operating system version, device date and time, mobile network information). We employ third-party technologies designed to allow us to recognize when two or more devices are likely being used by the same individual and may leverage these technologies (where permitted) to link information collected from different devices.

- **Interaction Information.** This may include how you use and interact with the Topgolf Offerings, including your search terms, pages you visit, content you view, videos you watch, your preferences, how frequently you access our services, whether you open emails or click the links contained in emails, whether you access our services from multiple devices, and other browsing behavior and actions you take on our services (such as the pages you visit, the content you view, videos you watch, the communications you have through our services, and the content, links and ads you interact with).
- **Precise and Approximate Location Data.** We may collect data about your location from your device, which may include your precise location when you grant us access through your device settings. We may collect this using different types of technologies, including GPS and Wi-Fi. If you use our mobile app and give us permission, we may access your device's location data in the background. You may turn off the collection of location data through your device settings. However, please note that we may still be able to collect or infer your approximate location through other data we collect, such as IP address. In addition, some mobile service providers may also provide us or our third party service providers with data regarding the physical location of the device used to access the Topgolf Offerings.
- **On-Premises Security Camera Data Collection.** If you visit one of our Locations or other offline Topgolf Offerings, we may also collect data or inferences about you through our on-premises security cameras for security, loss prevention, employee safety, investigations, and other legitimate video surveillance purposes.
- **Session Replay Technology.** Topgolf may record through session replay technology your interactions with the Topgolf Offerings, such as what pages you visit on the Topgolf Offerings, how long you visit those pages, the links you click, your mouse movements, keystroke or scrolling activity or information you provide to us. These tools may also record information when you interact with the Topgolf Offerings, such as by engaging in chat features or forum discussions. If collected, we will use this data for our internal business purposes, such as for website analytics, to improve the Topgolf Offerings and our products and services, to address functionality issues and to ensure compliance with our Terms and Conditions.

In addition, we may use a variety of other technologies that collect similar information for security, fraud detection, online functionality, and operational purposes. All of the information collected automatically through these tools allows us to improve your customer experience. For example, we may use this information to enhance and personalize your user experience, to monitor and improve our products and services, to offer communications features such as live and automated chat, and to improve the effectiveness of our products, services, offers, advertising, communications and customer service.

We may also use this information to: (a) remember information so that you will not have to re-enter it during your visit or the next time you visit the site; (b) provide custom, personalized content and information, including targeted content and advertising; (c) identify you across multiple devices; (d) provide and monitor the effectiveness of our services; (e) monitor aggregate metrics such as total number of visitors, traffic, usage, and demographic patterns on our website; (f) diagnose or fix technology problems; and (g) otherwise to plan for and enhance our products and services.

For information about the choices you may have in relation to our use of automatic data collection technologies, please refer to the Your Privacy Choices section below. For additional details about the cookies we use on our websites and to adjust your preferences with regard to those cookies, please click “Manage Cookie Preferences” linked in the footer of our websites.

Personal Data from Third Parties

We may receive the same categories of personal data as described above from the following sources and other parties:

- **Our Affiliates:** We are able to offer you the products and services we make available because of the hard work of our team members across entities in the Topgolf family as well as Callaway Golf Company. To provide our products and facilitate our services, Topgolf entities receive personal data from other Topgolf entities for purposes and uses that are consistent with this Privacy Notice.
- **Single Sign-On:** We may provide you the ability to log in to our services through certain third-party accounts you maintain. When you use these single sign-on protocols to access our services, we do not receive your login credentials for the relevant third-party service. Instead, we receive tokens from the single sign-on protocol to help identify you in our system (such as by your username) and confirm you successfully authenticated through the single sign-on protocol. This information allows us to more easily provide you access to the Topgolf Offerings.
- **Mobile Sign-On:** We may provide you the ability to log in to our Apps or authenticate yourself using facial, fingerprint, or other biometric recognition technology available through your mobile device. If you choose to utilize these login features, information about your facial geometry, your fingerprint, or other biometric information will be collected by your mobile device for authentication purposes. We do not store or have access to this biometric information. Instead, your mobile device will perform the biometric authentication process and only let us know whether the authentication was successful. If the authentication was successful, you will be able to access the applicable App or feature without separately providing your credentials. For more details, please refer to the biometric authentication guides offered by your device provider.
- **Other Players and Users:** We may receive your personal data from our other players and users of the Topgolf Offerings. For example, a user may provide us with your contact information when they add you to a reservation or a game.
- **Social Media:** When you interact with us through social media networks, such as when you follow us or share our content on other social networks, we may receive some information that you permit the social network to share with third parties. The data we receive is dependent upon your privacy settings with the social network, and may include profile information, profile picture, username, and any other information you permit the social network to share with third parties. You should always review and, if necessary, adjust your privacy settings on third-party websites and social media networks and services before sharing information and/or linking or connecting them to other services. We use this information primarily to operate, maintain, and provide to you the features and functionality of our products and services, as well as to communicate directly with you, such as to send you messages about features that may be of interest to you.

- **Advertisers, Influencers, Publishers and Third-Party Data Providers:** We engage in advertising both on our services and through third-party data providers. Advertisers, influencers, and publishers may share personal data with us in connection with our advertising efforts. For example, we may obtain information about whether an advertisement led to a successful engagement between you and Topgolf.
- **Business Partners:** We may receive your information from our business partners and brand partners, such as companies that offer their products and services as a part of or in connection with the Topgolf Offerings or marketing initiatives. For example, certain of our products and services allow our customers to integrate third-party services. If you choose to leverage these third-party service integrations, we may receive confirmation from our business partner regarding whether you are an existing customer of their services. This may also include information collected from any golf facility operated by a third party (“TTR Operators”) at which Toptracer Range is installed or other facilities owned by Topgolf system franchisees or licensees (“TTR Facilities”).
- **Service Providers:** Our service providers that perform services on our behalf, such as IT, analytics and certain marketing providers, collect personal data and often share some or all of this information with us. For example, we receive personal data you may submit in response to requests for feedback to our survey providers.
- **Other Sources:** We may also collect personal data about you from other sources, including publicly available sources, third-party data providers, brand partnerships, or through transactions such as mergers and acquisitions.
- **Inferences:** We may generate inferences or predictions about you and your interests and preferences based on the other personal data we collect and the interactions we have with you.

2. OUR USE OF PERSONAL DATA

We may use personal data we collect to:

- **Provide You Services:** To process transactions and fulfill your orders; provide the Topgolf Offerings to you and allow you to participate in our games, features, and services, including registration, managing your account, and making a reservation; facilitate your participation in golf lessons, leagues, and tournaments, as well as if you choose to participate in Toptracer Coach; book or participate in events at our Locations and TTR Facilities; depending on your settings, display a member’s first and last name or username on leaderboards at Locations and at TTR Facilities as well as on any digital platform such as our online Topgolf Offerings (including the Toptracer Range App) and social media and tracking your performance against other participants when you participate in gameplay; facilitate your gameplay on Toptracer Range at a TTR Facility; provide customer service; communicate with you, such as responding to your questions, complaints, or comments and collecting your feedback; and administer your participation in promotions.
- **Analytics, Advertising Activities and Marketing Messages:** To send you offers and promotions from us, our advertisers, partner companies, corporate affiliates, and third party partners online and offline; provide you with information about new products or services, events at our Locations or TTR Facilities,

or events that Topgolf sponsors (such as contests, sweepstakes and surveys); analyze customer behaviors and trends; conduct research and analysis; measure the effectiveness of our online and offline marketing efforts; and develop products, services and marketing programs.

- **Precise Location Services:** Our use of device-level precise location, where granted by you, is limited to locating a Topgolf Location near you and estimating travel times; identifying your nearest TTR Facility; and providing the Topgolf Offerings to you and allow you to participate in our games, features, and services, including identifying your location when participating in gameplay using our Apps. Depending on your permissions, we may also send you offers and provide special in-app features when you visit a Topgolf Location or TTR Facility based on this data.
- **Personalization:** To tailor and personalize the Topgolf Offerings, including our content, advertisements, and offers to you, both on our Topgolf Offerings and elsewhere online and offline; identify your preferences; and enhance your experience at our Topgolf Offerings. We may generate inferences or predictions about you and your interests and preferences based on the other personal data we collect and the interactions we have with you.
- **Administrative:** To verify your identity and age; conduct sales auditing and employee management activities; recognize you across the Topgolf Offerings and your devices; communicate with you regarding your inquiries or your use of the Topgolf Offerings, content, or features; and, in our discretion, make updates to our policies.
- **Internal Business Purposes:** To operate and improve the Topgolf Offerings, our products, and our services; to comply with legal obligations to process your job application; detect and troubleshoot problems, fraud, and criminal activity; analyze trends and usage patterns; and conduct market research.
- **Legal:** To resolve disputes; enforce our agreements and policies; cooperate with government or other legal inquiries, including investigation of public safety matters or investigations into claims of intellectual property infringement; fulfill regulatory reporting obligations; and protect our or others' rights/assets.
- **Security:** To protect integrity of the Topgolf Offerings; to investigate, detect, prevent, and protect against misuses of our systems, fraud, crime, or other illegal activities or activities that violate our policies; and to protect health and safety of our users or the general public.
- **Business Transitions:** In connection with a merger, acquisition, consolidation, bankruptcy, or other corporate transition, affecting all or part of our assets, including during due diligence.
- **Other Purposes:** As disclosed at the time of collection; for which you have provided your personal data; or for which you have otherwise consented.

3. OUR DISCLOSURE OF PERSONAL DATA

We disclose or otherwise make available personal data in the following ways:

- **Our Affiliates:** We are able to offer you the products and services we make available because of the hard work of our team members across the Topgolf family of companies as well as Callaway Golf Company. To provide our products and facilitate our services, Topgolf entities disclose personal data to other entities in the Topgolf family for purposes and uses that are consistent with this Privacy Notice. For example, the Topgolf entity responsible for a Website may disclose your contact information to a Topgolf entity in your region to facilitate communications between you and a local Topgolf representative.
- **Other Users:** We make available personal data designed for sharing through our services with certain or all other Topgolf users, or the general public, based on the applicable privacy settings and intended recipients. This may include where you join a game with friends or when your name is posted on a leaderboard during play.
- **Third party Advertising, Marketing and Analytics Providers:** We work with third-party ad networks and advertising partners to deliver advertising and personalized content on our services, on other websites and services, and across other devices. These parties may collect information automatically from your browser or device when you visit our websites and other services through the use of cookies and related technologies. This information may also be disclosed to providers who assist us with advertising measurements, conversion tracking, surveys and market or product research and development as well as marketing partners or unaffiliated third parties who are joint marketing and licensing partners or whose products or services are integrated in our Topgolf Offerings.
- **Golf Coaches with Whom you Interact via Toptracer Coach:** Individuals who participate in our coaching platform ("Toptracer Coach") join an interactive coaching experience where coaches create custom lesson plans tailored to each unique student. If you choose to participate in Toptracer Coach, your designated coach will have access to certain personal data, including your name, email address, account and profile information, performance data, and Toptracer Range usage data (including locations and dates/times) to provide them with an objective view of your current skillset, allowing your coach to follow-up on your performance, set new goals, and assist you with reaching your objectives.
- **TTR Operators:** When you visit any TTR Facilities, we may share certain data, such as profile information, session information and performance information, with the TTR Operator to enable them to analyze such data for their own business purposes, including for their marketing campaigns, to carry out events and display leaderboards. This occurs, in part, through the Toptracer Range App and the Toptracer Range Management System. TTR Operators often utilize the Toptracer Range Management System, which aggregates and presents data related to the operation of TTR Facilities, to support customer relations management and various business operations and activations (e.g., the configuration of leaderboards). Where permitted by law, the data we share with the TTR Operator may include your personal data, which the TTR Operator may use for the purposes of directly sending you communications and promotional materials regarding their services, or through the Topgolf Offerings. Please note that we are not responsible for the privacy practices of TTR Operators and the personal data you disclose to TTR Operators is subject to their privacy practices. TTR Operators and TTR Facilities are not owned or operated by Topgolf. You may be able to opt-out of sharing data with TTR Operators by contacting us using the contact information below and, to the extent available, through any opt-out mechanisms within the Apps.

- **Business Partners:** We may share personal data with our business partners (including unaffiliated parties that are joint marketing and licensing partners or distributors of Toptracer Range), or we may allow our business partners to collect personal data directly from you in connection with our services. Our business partners may use your personal data for their own business and commercial purposes, including to send you information about their products and services.
- **Sweepstakes/Contest Partners:** Such as TTR Operators, administrators, other prize providers, prize fulfillment vendors, and sponsors/partners of the sweepstake/contest.
- **Service Providers:** We use service providers and sub-processors (“Service Providers”) to provide services to us or on our or your behalf, such as payment processing, customer relationship management, scheduling bookings (e.g., events, reservations, and golf lessons), food and beverage, information technology, communications, technology systems service providers (e.g., webhosts, database hosts, cloud computing providers, software-as-a-service providers, and technology maintenance and repair vendors) and insurance. We give these Service Providers access to your personal data (or allow them to collect data from or about you) so that they can provide these services.
- **Government Agencies and Law Enforcement/Where Required by Law:** We may transfer and disclose your personal data (i) in response to subpoenas, warrants, court orders, or in connection with any legal process, or to comply with relevant laws or (ii) at the request of governmental authorities conducting an investigation. In addition, notwithstanding any term to the contrary in this Privacy Notice, we reserve the right to use and disclose your personal data to investigate, prevent or act regarding illegal activities, suspected fraud, situations involving potential threats to the rights or physical safety of any person, or violations of the Terms and Conditions or other applicable policies.
- **Third Parties in the Course of a Business Transaction:** In case of a transfer or sale of some or all our business or assets, bankruptcy, or merger, or other corporate transaction (including, without limitation during the negotiation stage and in the course of any due diligence process), we may transfer or assign your personal data to those involved in such a transfer or sale of business or assets, which you agree that we may do without your further consent.
- **Third Parties to Whom You Agree or Direct us to Share Your Data:** We may ask if you would like us to share your data with unaffiliated third parties who are not described elsewhere in this Privacy Notice and we may permit partner companies and other third parties to collect your data directly from you, with your permission. We do not share your personal data with third parties for those third parties’ direct marketing purposes unless you consent (opt-in or opt-out) to such sharing. For example, you may be presented with an opportunity to receive marketing offers from a third party or you may engage with a Social Site platform or other third party application or feature, through which data about you is shared. If you later decide that you no longer want to receive communications from a third party, you will need to contact that third party directly.
- **Deidentified Data:** We may share non-personal data that we collect, such as certain Device Information, Interaction Information, aggregate user statistics, and hashed or otherwise de-identified data, with third parties in our discretion as permitted by law, including for targeted advertising purposes.

For additional information, including about specific parties to which we disclose your personal data, please contact us using the Contact Us information below.

4. YOUR PRIVACY CHOICES

The following privacy choices are made available to all individuals with whom we interact. You may also have additional choices regarding your personal data depending on your location or residency. Please refer to our Jurisdiction-Specific Rights below for information about additional privacy choices that may be available to you.

Communication Preferences

- **Email Communication Preferences:** You may unsubscribe from marketing emails we send you through the opt-out mechanism included in each such email. Note, however, that we reserve the right to send you certain communications relating to your use of our products or services, which may include notices of changes to this Privacy Notice or similar administrative and transactional messages.
- **SMS/Text Message Communication Preferences:** You can unsubscribe from promotional text messages from us at any time by texting “STOP” to the number provided in the SMS/text message. A SMS/text message will be sent confirming your removal. We reserve the right to remove subscribers from our messaging database. For more info, text “HELP” to the number provided in the SMS/text message. Please note we may need to continue to communicate with you via SMS/text message for certain service-related messages (such as, sending a verification code to your phone via SMS/text message for purposes of verifying the authenticity of a log-in attempt).
- **Push Notification Preferences:** Topgolf Offerings, a TTR Operator, or TTR Operator Promotion partner may send promotional and non-promotional push notifications or alerts to your mobile device. You can elect to stop receiving those messages at any time by changing the notification settings on your mobile device or in the applicable App. Please note we do not have any control over your device’s notifications settings and are not responsible if they do not function as intended.

Withdrawing Your Consent

Where we have your consent for the processing of your personal data (e.g., when you opt in to receive certain types of marketing communications from us), you may withdraw your consent by following the instructions provided when your consent was requested or by contacting us as set forth in the Contact Us section below.

Automatic Data Collection Preferences

Certain of our services may provide you the ability to adjust your preferences regarding our use of automatic data collection technologies.

- **Our Tools:** There is a “Manage Cookie Preferences” link in the footer of our Websites that allows you to adjust your preferences regarding certain automatic data collection technologies on the specific Website you are visiting for the specific device and browser you are using at that time (which means

you will need to change your preferences on each device and browser you use to interact with the specific website you are visiting).

- **Do Not Track:** Please note that your browser settings may allow you to automatically transmit a “Do Not Track” signal to websites and online services that you visit. When you choose to turn on the “Do Not Track” settings in your browser, your browser will send a signal to websites, analytics providers, advertisements networks, plug-in providers, and other web service providers you encounter while browsing to stop tracking your activity. To find out more about and to set up “Do Not Track”, please visit allaboutdnt.com.
- **GPC:** The Websites are also enabled to respond to the Global Privacy Control (“GPC”) is a technical specification in your browser settings that you can use to automatically inform websites of your privacy preferences with respect to third party online tracking. To find out more about and to set up GPC, please visit globalprivacycontrol.org/#about.

Where a Topgolf-specific preference manager or privacy setting is not available, you may be able to utilize third-party tools and features to further restrict our use of automatic data collection technologies. For example, (i) most browsers allow you to change browser settings to limit automatic data collection technologies on websites, (ii) most email providers allow you to prevent the automatic downloading of images in emails that may contain automatic data collection technologies, and (iii) many devices allow you to change your device settings to limit automatic data collection technologies for device applications. Please note that blocking automatic data collection technologies through third-party tools and features may negatively impact your experience using our services, as some features and offerings may not work properly or at all. Depending on the third-party tool or feature you use, you may not be able to block all automatic data collection technologies or you may need to update your preferences on multiple devices or browsers. We do not have any control over these third-party tools and features and are not responsible if they do not function as intended.

Targeted Advertising Preferences

We engage third parties to help us facilitate targeted advertising designed to show you personalized ads based on predictions of your preferences and interests developed using personal data we maintain and personal data our third-party partners obtain from your activity over time and across nonaffiliated websites and other services. The data we and our third-party partners use for purposes of facilitating targeted advertising, as well as to provide advertising-related services such as reporting, attribution, analytics, and market research, are primarily collected through the use of a variety of automatic data collection technologies, including cookies, web beacons, pixels, embedded scripts, mobile SDKs, location-identifying technologies and logging technologies. We may share a common account identifier (such as a hashed email address or user ID) with our third-party advertising partners to help link the personal data we and our third-party partners collect to the same person, or otherwise target advertising to an individual on a third-party website or platform.

In addition to taking the steps set forth in the Automatic Data Collection Preferences section above, you may be able to further exercise control over the advertisements that you see by leveraging one or more targeted advertising opt-out programs. For example:

- **Device-Specific Opt-Out Programs:** Certain devices provide individuals the option to turn off targeted advertising for the entire device (such as Apple devices through their App Tracking Transparency framework or Android devices through their opt out of ads personalization feature). Please refer to your device manufacturer's user guides for additional information about implementing any available device-specific targeted advertising opt-outs
- **NAI/DAA Opt-Out:** We use a variety of third parties to perform advertising and analytics services, and some of these companies may be members of the Network Advertising Initiative ("NAI") or Digital Advertising Alliance ("DAA"). You may wish to visit optout.networkadvertising.org, which provides information regarding targeted advertising and the opt-out procedures of NAI members, including opt out mechanisms for web browsers, mobile and other connected devices, and a tool to opt out from participating NAI members using your hashed email address for interest-based advertising. You may also want to visit optout.aboutads.info, which provides information regarding targeted advertising and offers an opt-out for DAA-participating companies. Note that these are cookie-based opt-outs. If you disable your Cookies or upgrade your browser after opting out, or if you use different devices or browsers, you will need to indicate your opt-out choices across those other devices and browsers. European Union and United Kingdom residents, please refer to the European Digital Advertising Alliance ("EDAA") choice page by going to youronlinechoices.com/. Australian and South Korean residents, please refer to DAA's choice page by going to youradchoices.com/control. Mobile devices may contain settings that allow you to disable tracking advertising and analytics. In addition, the digital advertising industry has provided the ability for mobile users to register their intent not to receive targeted advertising at aboutads.info/appchoices.
- **Platform-Specific Opt-Out Programs:** Certain third-party platforms provide individuals the option to turn off targeted advertising for the entire platform (such as certain social media platforms). Please refer to your platform provider's user guides for additional information about implementing any available platform-specific targeted advertising opt-outs.

Please note that when you opt out of receiving interest-based advertisements through one of these programs, this does not mean you will no longer see advertisements from us or on our services. Instead, it means that the online ads you do see from relevant program participants should not be based on your interests. We are not responsible for the effectiveness of, or compliance with, any third parties' opt-out options or programs or the accuracy of their statements regarding their programs. In addition, program participants may still use automatic data collection technologies to collect information about your use of our services, including for analytics and fraud prevention as well as any other purpose permitted under the applicable advertising industry program.

Modifying or Deleting Your Personal Data

Some of our online Topgolf Offerings may allow you to modify or delete your account profile. If you have any questions about reviewing, modifying, or deleting your personal data, you can contact us directly at (833) 554-0955. We may not be able to modify or delete your personal data in all circumstances; for example, we cannot modify the information that is included in your national ID, or data that we are legally required to retain for a period of time.

Partner-Specific Preferences

Certain of our third-party providers and partners offer additional ways that you may exercise control over your personal data, or automatically impose limitations on the way we can use personal data in connection with the services they provide:

- **Device-Specific / Platform-Specific Preferences:** The device and/or platform you use to interact with us (such as your mobile device or social media provider), may provide you additional choices with regard to the data you choose to share with us. For example, many mobile devices allow you to change your device permissions to prevent our products and services from accessing certain types of information from your device (such as your contacts or specific/precise location data), and many social media platforms allow you to change your platform permissions to prevent integrated products and services from accessing certain types of information connected with your profile. Two such specifications include: Please refer to your device or platform provider's user guides for additional information about implementing any available platform-specific targeted advertising opt-outs.
- **Google Analytics.** We use Google Analytics, which uses cookies and similar technologies to collect and analyze data about use of the Topgolf Offerings and provide other report. This service may also collect data regarding the use of other websites, apps, and online services. You can learn about Google's practices by going to <https://google.com/policies/privacy/partners>, and opt out of them by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>. We may also utilize certain forms of display advertising and other advanced features through Google Analytics. These features enable us to use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the DoubleClick advertising cookie) or other third-party cookies together to inform, optimize, and display ads based on your past visits to our services. You may control your advertising preferences or opt-out of certain Google advertising products by visiting the Google Ads Preferences Manager, currently available at <https://myadcenter.google.com/?ref=help-center>.

5. INTERACTING WITH THIRD PARTIES

This Privacy Notice does not apply to our business partners, which include TTR Operators. The online Topgolf Offerings may provide links to websites, gaming platforms, and online services operated by third parties. These third parties use their own cookies and other tracking technologies on your device, and they may independently collect personal data from you. We assume no responsibility for third parties or their privacy practices. This Privacy Notice applies only to our Topgolf Offerings.

6. CHILDREN'S PRIVACY

Except as noted in our Notice to European Economic Area/United Kingdom Residents, Notice to Australian Residents, and Notice to South Korean Residents, our Websites and Apps are not directed to persons who are at least thirteen (13) years of age, and we do not intend to, or knowingly, collect or solicit any personal data from children younger than the age of thirteen (13) years. If a person is under the age of thirteen (13), they should not use our services or otherwise provide us with any personal data either directly or by other

means. If a parent or guardian is made aware that a child under the age of thirteen (13) years has provided us with personal data through any point of contact, please call us toll-free at +1 (833) 554-0955 or write to us at the contact details below (see Section 12, Contact Us), and we will delete the personal data. If we have actual knowledge that personal data about a person younger than the age of thirteen (13) years has been collected without parental/guardian consent, then we will take the appropriate steps to delete such personal data.

7. SECURITY OF PERSONAL DATA

We have implemented reasonable physical, technical, and organizational safeguards that are designed to protect your personal data. In addition, we take steps designed to ensure that our Service Providers provide a similar level of protection. However, we cannot guarantee or warrant the security of any data you disclose or transmit to us, or that we transmit to you, or guarantee that it will be free from unauthorized access by third parties. For more information on our technical and organizational security measures that are in place, please email or write to us at the contact details set out below.

8. RETENTION AND DESTRUCTION OF PERSONAL DATA

For personal data that we collect and process, we typically keep such personal data for as long as reasonably necessary to fulfill the purposes for which it was collected or for which you subsequently authorize it and otherwise to carry out the purposes described in this Privacy Notice, and as otherwise permitted by applicable law or needed to address tax, corporate, compliance, litigation, insurance claims, and other legal rights and obligations. To determine the appropriate duration of the retention of personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of personal data and if we can attain our objectives by other means, as well as our legal, regulatory, tax, accounting, and other applicable obligations. Where personal data is no longer needed, we will either securely destroy or deidentify the Personal Data or, if that is not possible (for example, because personal data has been stored in backup archives), we will securely store the personal data and isolate it from further active processing until deletion or deidentification is possible. For more information on our retention policies, please email or write to us at the contact details below.

9. CROSS-BORDER TRANSFERS OF DATA

Topgolf is headquartered in the United States. If you use a Topgolf Offering outside of the United States, and provide us with data, you acknowledge and, where appropriate, agree that your personal data may be processed for the purposes identified in this Privacy Notice. Please be aware that data that we collect will be transferred to and processed in the United States and other jurisdictions. By using the Topgolf Offerings outside of the United States, you specifically acknowledge and agree to our collection, processing, storage, or transfer of your personal data in the United States and other jurisdictions, including in countries where data protection standards may differ from those in the country where you reside. In certain

circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in the United States and other countries may request to access your personal data in accordance with the laws of that jurisdiction.

10. REGION-SPECIFIC NOTICES

We may choose or be required by law to provide different or additional disclosures relating to the processing of personal data about residents of certain countries, regions or states. Please refer below for disclosures that may be applicable to you:

- **Australia:** If you are a resident of Australia, please click [here](#) for additional Australia-specific privacy disclosures, including a description of the personal data rights made available to residents of certain states under applicable law.
- **European Economic Area/United Kingdom:** If you are located in the European Economic Area (Member States of the European Union together with Iceland, Norway, and Liechtenstein) or the United Kingdom, please click [here](#) for additional European-specific privacy disclosures, including a description of the personal data rights made available to individuals located in those jurisdictions under applicable law.
- **South Korea:** If you are a resident of South Korea, please click [here](#) for additional South Korean--specific privacy disclosures, including a description of the personal data rights made available to residents of certain states under applicable law.
- **United States:** If you are a resident of the United States, please click [here](#) for additional U.S.-specific privacy disclosures, including a description of the personal data rights made available to residents of certain states under applicable law.

11. CHANGES IN OUR PRIVACY NOTICE

To the extent allowed by applicable law, Topgolf reserves the right to change our Privacy Notice at any time. Topgolf will notify you of material changes by posting the changed or modified Privacy Notice by revising the Effective Date at the top of this Privacy Notice. We may also provide notice to you in other ways, such as through contact information you have provided. Any changes will be effective immediately upon the posting of the revised Privacy Notice unless otherwise specified. Your continued use of the Topgolf Offerings after the Effective Date of the revised Privacy Notice those changes will apply to the fullest extent allowed by applicable law. However, Topgolf will provide notice and obtain your consent (opt-in or opt-out) if required by applicable law. Note that we may not be able to provide you with some of the Topgolf Offerings without your consent.

12. CONTACT US

If you have any questions regarding this Privacy Notice or privacy-related matters, you can contact us by (833) 554-0955 or at the following mailing address:

Topgolf International, LLC
Attn: Privacy Team
8750 N. Central Expressway, Suite 1200
Dallas, TX 75231

If you reside in the UK and have any questions regarding this Privacy Notice or you wish to exercise any of your data subject rights, you can submit your request using our Privacy Portal or contact us at the following mailing address:

Topgolf Limited,
Attn: Privacy Team,
Unit 8, Shepperton Business Park,
Govett Avenue, England, TW17 8BA

If you reside in the EEA/EU, you can also write to our representative in the EEA/EU at the following address:

Topgolf Sweden AB,
Attn: Privacy,
Svärdvägen, 11 4tr,
SE-182 33 Danderyd, Sweden

Controllers by Country

Country	Company	Address
Sweden	Topgolf Sweden AB (EU/EEA Representative)	Svärdvägen, 3A, SE-182 33 Danderyd, Sweden
Japan	Topgolf Japan GK	c/o Baker & McKenzie, Ark Hills Sengokuyama Mori Twr. 28F, 1-9-10 Roppongi, Minato - ku, Tokyo
United Kingdom	Topgolf Limited(UK Representative)	Unit 8 Shepperton Business Park, Govett Avenue, Shepperton TW17 8BA
United Kingdom	Topgolf Group Limited	Unit 8 Shepperton Business Park, Govett Avenue, Shepperton TW17 8BA
United Kingdom	World Golf System Group Limited	Unit 8 Shepperton Business Park, Govett Avenue, Shepperton TW17 8BA
United States of America	Topgolf International, LLC	N. Central Expressway, Suite 1200 Dallas, U.S.A. TX 75231
United States of America	Topgolf USA LLC	N. Central Expressway, Suite 1200 Dallas, U.S.A. TX 75231
United States of America	Topgolf Pro LLC	N. Central Expressway, Suite 1200 Dallas, U.S.A. TX 75231

Country	Company	Address
United States of America	Topgolf Payroll Services LLC	N. Central Expressway, Suite 1200 Dallas, U.S.A. TX 75231
United States of America	Topgolf Media Services LLC	N. Central Expressway, Suite 1200 Dallas, U.S.A. TX 75231
United States of America	World Golf Tour LLC	N. Central Expressway, Suite 1200 Dallas, U.S.A. TX 75231

NOTICE TO AUSTRALIA RESIDENTS

If you are a resident of Australia, the following information applies.

Definitions and Interpretation – This Notice to Australia Residents supplements and incorporates and should be read together with the information contained in our Privacy Notice to which this is attached. It provides additional information about our privacy practices in relation to our Australian-related activities. If there is any conflict between the terms of this Notice to Australia Residents and the Privacy Notice, the terms of this Notice to Australia Residents will prevail. Otherwise, the terms of the Privacy Notice apply and are incorporated into this Notice to Australia Residents. References to “personal data” in the Privacy Policy and “personal information” in this Notice to Australian Residents will, for the purposes of this Notice to Australian Residents, be taken to have the same meaning as “personal information” in the Australian Privacy Act 1988 (Cth) (the “Privacy Act”). References to “sensitive information” in this Notice to Australian Residents will have the same meaning as “sensitive information” in the Privacy Act. The Privacy Act and this Notice to Australia Residents do not differentiate between “controllers” and “processors” of personal information and apply irrespective of whether we would be considered a controller or processor under the Privacy Notice or any other privacy law. Where additional personal information or sensitive information not detailed in this Notice to Australia Residents is to be collected, we will provide you with a separate privacy collection notice (“PCN”) for that collection. Any such PCN is to be read together with this Notice to Australia Residents (and the Privacy Notice as incorporated into this Notice to Australian Residents) in relation to that collection.

Identity and Contact Information - The Topgolf Offerings are owned and operated by Topgolf International, LLC and our address is N. Central Expressway, Suite 1200 Dallas, U.S.A. TX 75231. If you have any questions, concerns, or comments about the Topgolf Offerings, please reach out by calling +1 (833) 554-0955 or writing to us at the following mailing address: Topgolf, Attn: Privacy Team, 8750 N. Central Expressway, Suite 1200 Dallas, U.S.A. TX 75231.

Collection Information – The way we collect your personal information and sensitive information, as well as the details of the type of information we collect is detailed in the Privacy Notice at Section 1.

Collection Consent – By providing us with your information of using our services you consent to our collection, use and disclosure of your sensitive information as detailed in this Notice to Australian Residents. The sensitive information we collect about you is your:

- **Demographic Data.** This may include your age, date of birth, sex and/or gender, marital status, zip code.
- **Geolocation Data.** This includes your precise location when this function has been turned on by you.
- **Biometric Data.** Where you chose to log in to our Apps using such means, your faceprint (for facial recognition), fingerprint and other biometric information.
- **Government Identification.** Such as your driver's license number or other government-issued identifier.

This consent remains valid unless and until you notify us in writing of the withdrawal of your consent to our processing of your sensitive information. However, if you do withdraw your consent or if you do not provide us with the sensitive information requested for the relevant purpose(s), we will be unable to provide you with the relevant services for which we are seeking to collect, use and disclose your sensitive information. Where you provide us with personal information about any other individual, you warrant that you have the authority of that individual to disclose such information and that you have referred that individual to the Privacy Notice and this Notice to Australia Residents regarding how we collect, use and disclose their personal information. Where you provide us with sensitive information about any other individual, you warrant that you have the consent of that individual to disclose such information and that you have referred that person to the Privacy Notice and this Notice to Australia Residents and they consent to us collecting, using and disclosing the sensitive information in accordance with this Notice to Australia Residents until that consent is withdrawn by notifying them us in writing of the withdrawal of the consent to our processing of their sensitive information.

Likely Overseas Disclosure - Personal information we collect may be disclosed to overseas recipients that are located in the United States or any other country in which we or our subcontractors maintain facilities. We rely on your consent to facilitate this disclosure in the United States and other jurisdictions, where laws regarding processing of personal information may be less stringent than the Australian Privacy Principles. In certain cases, we may rely on appropriate saf safeguards such as standard contractual clauses as a basis for the overseas disclosure.

Your Rights to Access and Correct Your Personal information - You have the right to access and correct inaccuracies in your personal information in our custody and control, subject to certain exceptions prescribed by law. You also have the right to make complaints about our handling of your personal information as detailed below. You may request access and corrections of inaccuracies in your personal information we have in our custody or control by writing to us at the following mailing address: Topgolf, Attn: Privacy Team, 8750 N. Central Expressway, Suite 1200 Dallas, U.S.A. TX 75231. We may request certain personal information for the purposes of verifying the identity of the individual seeking access to their personal information.

Third Party Advertising. As discussed in the Privacy Notice at Sections 3 and 4 , we work with certain third party advertising companies in connection with our online advertising and those companies may set cookies or other tracking technologies in connection with providing advertising related services to us. Please refer to EDAA's choice page at <https://www.youronlinechoices.com> to learn more about your choices related to advertising with respect to participating EDAA member companies.

Users Younger Than Age 16

Our Websites and Apps are directed to persons in Australia who are at least sixteen (16) years of age and we do not knowingly collect any personal data from children in Australia younger than the age of sixteen (16) years old. If a parent or guardian in Australia is made aware that a child under the age of sixteen (16) years has provided us with their personal information through any point of contact, please call us at +1 (833) 554-0955 or write to us at the contact details below, and we will delete the personal information. If we have actual knowledge that personal information about a person in Australia younger than the age of sixteen (16) years old has been collected without parental/guardian consent we will take the appropriate steps to delete such personal information.

Protecting Your Information - The steps that we take to protect your personal information are those that are reasonable in the circumstances to protect the information from misuse, interference, loss and unauthorised access, modification or disclosure. These are more fully described in Section 7.

Complaints and Resolving Concerns - If you have any questions or comments about this Privacy Notice or if you otherwise have a question or complaints about the manner in which we or our service providers treat your personal data, you may contact us by writing to us at the following mailing address: Topgolf, Atn: Privacy Team, 8750 N. Central Expressway, Suite 1200 Dallas, U.S.A. TX 75231. We will investigate your complaint, respond within a reasonable time and attempt to resolve it. If we cannot resolve your complaint to your satisfaction, you may submit your complaint online ([OAIC Web Form](#)) to the Office of the Australian Information Commissioner or by standard post or registered mail to GPO Box 5288, Sydney NSW 2001 or by fax to +61 2 6123 5145.

NOTICE TO INDIVIDUALS IN THE EUROPEAN ECONOMIC AREA/UNITED KINGDOM RESIDENTS

If you are located in the European Union ("EU"), in the European Economic Area ("EEA") countries, or in the United Kingdom ("UK"), the following additional information applies in relation to the use and processing of your personal data under the General Data Protection Regulation (the "GDPR"), and the UK General Data Protection Regulation together with the UK Data Protection Act (the "UK GDPR").

OUR ROLE IN THE PROCESSING PERSONAL DATA

Topgolf and its corporate affiliates

The Topgolf corporate affiliate that you interact with is, as a starting point, the controller of your personal data. However, where Topgolf and its relevant corporate affiliates work together and collaborate for the

purposes outlined in the Privacy Notice, we are joint controllers and jointly responsible for the processing of your personal data. Topgolf and its corporate affiliates have entered into a joint controllership arrangement to allocate the responsibility between the companies to ensure the protection of your personal data when the relevant corporate affiliates are jointly responsible for the processing of your personal data. You have the right to receive information on the essence of this arrangement. If you wish to receive further information, please contact us on the contact details outlined in Section 12 (Contact Us) above. A list of the Topgolf corporate affiliates covered by this information is included in the same section above.

Joint controllership with TTR Operators

TTR Operators are separate controllers and responsible for their own processing of your personal data for their own business purposes. However, for the processing of personal data to manage events and leaderboards in the Toptracer Range Management System, we and relevant TTR Operators are joint controllers. We have entered into a joint controllership arrangement with relevant TTR Operators in relation to this processing of personal data. If you wish further information regarding the essence of this arrangement, please contact us on the contact details outlined in Section 12 (Contact Us) above.

OUR USE OF PERSONAL DATA AND LEGAL BASIS

In the table below, we outline which categories of personal data we process and the legal basis for the processing in relation to the purposes for which we collect and process your personal data. The purposes for which we process your personal data in particular depend on, for example, how you interact with us and your relationship with us.

Purpose	Categories of personal data	Legal basis
Provide You Services	Contact information, Payment information, User account information, Transaction information, Information about your interests, preferences and performance, Demographic data, Photo/video data, User generated content, Professional information, Health data, Device information, Interaction information	Performance of a contract: If you as an individual have entered into a contract with us for the use of the relevant Topgolf Offerings, we process your personal data to fulfill the contract. You must provide the information that we request (and which is marked as mandatory) in order to enter into the contract. If you do not provide the information requested, you cannot use the relevant Topgolf Offering. Legitimate interest: If we have entered into a contract with a company or organization that you represent for the use of the relevant Topgolf Offerings, or if the use of the relevant Topgolf Offerings is not subject to any specific terms and conditions, our processing of your personal data is necessary to satisfy our legitimate interest of providing you with the relevant Topgolf Offerings. Moreover, where Topgolf corporate affiliates are joint controllers and collaborate for this purpose, the corporate affiliate which has not entered into the relevant contract for the use of the relevant Topgolf Offering rely on its legitimate interest of providing you with the relevant Topgolf Offering for the processing of your personal data. Explicit consent: We only collect and process your health data to provide you with the relevant Topgolf Offerings if you have provided your explicit consent to such processing.
Analytics, Advertising Activities and Marketing Messages	Contact information, User account information, Transaction information, Information about your interests, preferences and performance, Demographic data, Government identification (if you win a contest or sweepstakes), Professional information, Device information, Interaction information, Session replay technology	Legitimate interest: Where your consent is not needed for analytics and advertising activities, the processing is necessary to satisfy our legitimate interest of better understanding our customers and users to provide you with a better experience and to promote our Topgolf Offerings. Soft-opt-in: If we have collected your contact information in connection with a purchase of a Topgolf Offering and you did not opt-out against our use of your contact information for marketing purposes, we rely on soft-opt-in to send you digital marketing communication. Consent: We rely on your consent as a legal basis for the processing of your personal data in two situations: (i) where legally required for digital marketing communication in which case we collect your consent before sending such digital marketing communications, and (ii) where we process your personal data using marketing and analytics cookies and similar technologies in which case we collect your consent through opt-in mechanisms available in the relevant Topgolf Offerings.
Precise Location Services	Device information, Precise and approximate location data	Consent: We only collect and process your personal data, including your location data, for this purpose with your prior consent, which you provide by granting relevant permissions in your device for us to access your device's location services.

Purpose	Categories of personal data	Legal basis
Personalization	User account information, Transaction information, Information about your interests, preferences and performance, Demographic data, Professional information, Device information, Interaction information	Legitimate interest: The processing of your personal data is necessary to satisfy our legitimate interest of personalizing your experience in your interactions with us and our Topgolf Offerings. Consent: Where we use cookies and similar technologies for this purpose, we only collect and process your personal data based on your consent that you provide through opt-in mechanisms available in the relevant Topgolf Offerings. Moreover, to the extent the processing involves profiling of you for this purpose, we collect your consent before carrying out such profiling activities.
Administrative	Contact information, User account information, Transaction information, User generated content, Professional information	Legitimate interest: The processing of your personal data is necessary to satisfy our legitimate interest of operating and managing the business effectively.
Internal Business Purposes	Contact information, User account information, Transaction information, Demographic data, User generated content, Professional information, Device information, Interaction information, Session replay technology	Legitimate interest: The processing of your personal data is necessary to satisfy our legitimate interest of ensuring that the Topgolf Offerings, our products and services operate efficiently and that we provide a great user experience. Fulfill legal obligations: We also process your personal data for this purpose to comply with legal obligations to which we are subject. Consent: Where we process your personal data using cookies and similar technologies for this purpose, we collect your prior consent to the processing through opt-in mechanisms available in the relevant Topgolf Offerings.
Legal	We process relevant categories of personal data to manage the specific legal matter, but normally the following categories of personal data is processed: Contact information, User account information, Transaction information, Demographic data, Photo/video data, User generated content, Professional information	Legitimate interest: The processing of your personal data is necessary to satisfy our legitimate interest of managing legal matters and to protect the business, our rights, assets, and our staff.

Purpose	Categories of personal data	Legal basis
Security	User account information, Transaction information, Demographic data, Professional information, Device information, Interaction information, On-premises security camera data collection, Session replay technology	Legitimate interest: The processing of your personal data is necessary to satisfy our legitimate interest of ensuring the security of our Topgolf Offerings and our systems, and to protect our business and our users. Fulfill legal obligation: Where we process your personal data for this purpose in order to implement appropriate technical and organizational security measures under the GDPR and the UK GDPR, the processing is necessary to comply with this legal obligation.
Business Transitions	We process relevant categories of personal data necessary to carry out the specific business transition.	Legitimate interest: The processing of your personal data is necessary to satisfy our legitimate interest of enabling, facilitating, and completing corporate transactions and ensuring business continuity.

LEGAL BASIS FOR OUR DISCLOSURE OF PERSONAL DATA

As described in Section 3 (Our Disclosure of Personal Data) above, we provide third parties with certain personal data for the purposes outlined in the same section. In the table below, we explain which legal basis we rely on for sharing your personal data with these third parties. The third-party recipients outlined below are, unless otherwise is stated, responsible for their own subsequent use and processing of your personal data for their own purposes, including, where relevant, to send you information about their products and services.

Recipient	Legal basis
Our Affiliates	Legitimate interest: The sharing of your personal data with relevant affiliates is necessary to satisfy our legitimate interest of providing our products and facilitate our services.
Our Users	Legitimate interest: The sharing of your personal data with other users of our Topgolf Offerings is necessary to satisfy our legitimate interest of providing a great user experience when using our Topgolf Offerings.
Third party Advertising, Marketing and Analytics Providers	Consent: The sharing of your personal data with third party advertising, marketing and analytics providers using cookies and similar technologies is based on your consent that you provide through opt-in mechanisms available in the relevant Topgolf Offerings. Where third party advertising, marketing and analytics providers process your personal data on our behalf and in accordance with our instructions as processors, the processing is based on the same legal basis as we rely on for the processing of your personal data as described in the table above, please see Analytics, Advertising Activities and Marketing Messages.

Recipient	Legal basis
Golf Coaches with Whom you Interact via Toptracer Coach	Performance of a contract: The sharing of your personal data with golf coaches is necessary to fulfill the contract with you regarding Topgolf Coach.
TTR Operators	Legitimate interest: The sharing of your personal data with TTR Operators when you visit a TTR Facilitate is necessary to satisfy our and the TTR Operator's legitimate interest of supporting customer relations management, making it possible for the TTR Operator to understand their customers, and to develop and improve their business strategies, practices and methods to provide an even better customer experience, carrying out events, displaying leaderboards, and to communicate with you, including to send you offers and marketing.
Business Partners	Legitimate interest: The sharing of your personal data with business partners (such as marketing and licensing partners or distributors of Toptracer Range) is necessary to satisfy our legitimate interest of providing you with our services. Consent: Where consent is needed to share your personal data with business partners (for example for their own business and commercial purposes), we only share your personal data based on your consent.
Service Providers	We use service providers that provide certain services to use, for example IT infrastructure services for our Topgolf Offerings. When service providers process personal data on our behalf to provide us with services they act as processors. In such a case, the processing of your personal data by the service providers is based on the same legal basis as we rely on for the processing of your personal data as described in the table above, since the processing is carried out under our responsibility and authority.
Government Agencies and Law Enforcement	Legal obligation: Where the sharing of your personal data with government agencies and law enforcement is necessary to comply with a specific legal obligation to which we are subject, we rely on that legal obligation as a legal basis for the sharing. Legitimate interest: Where the sharing of your personal data with government agencies and law enforcement is not strictly necessary to comply with a legal obligation, we rely on our legitimate interest to manage legal matters and to manage, defend and exercise legal rights and claims for the sharing of the personal data.
Third Parties in the Course of a Business Transaction	Legitimate interest: The sharing of your personal data with third parties in the course of a business transaction is necessary to satisfy our legitimate interest of enabling, facilitating, and completing the specific corporate transaction and ensuring business continuity.
Third Parties to Whom You Agree or Direct us to Share Your Data	Consent: Where we have asked you if you like us to share your personal data with unaffiliated third parties, we rely on the consent that you provide as a legal basis for such sharing.

RETENTION OF PERSONAL DATA

In addition to the information outlined in Section 8 (Retention and Destruction of Personal Data), please find below additional information regarding the criteria used to determine for how long we store your personal data.

- **Active relationship:** If we have an active relationship, for example if you actively use our Topgolf Offerings, we normally keep the personal data necessary to manage the relationship and your use of the Topgolf Offerings for as long as the relationship is active. In addition, game session information will be stored for as long as you use our Topgolf Offerings.
- **Marketing:** Provided that you have not opted out of our use of your personal data for marketing purposes, we normally keep your personal data for this purpose for as long as there is an active relationship with you.
- **Comply with legal requirements:** We keep your personal data for such period as is necessary to comply with legal obligations to which we are subject, for example accounting and bookkeeping requirements or to cooperate with a manage and defend legal claims: We normally keep your personal data for such period during which a legal claim can arise under law in order to manage and defend such legal claims.
- **Manage specific activities that you participate in:** If you participate in an event, contest, sweepstakes or a survey that we carry out, we normally keep your personal data to manage the activity for the duration of the activity as such. However, we will display your first and last name or username on leaderboards until further notice or until you opt out of this.
- **Fulfill legitimate business needs:** We also keep your personal data during such period as is necessary to fulfill specific legitimate business needs, for example to carry out research or analysis in which case the personal data used and collected is normally only processed for such period that is necessary to carry out the specific research or analysis and to compile a report with the result.
- **Security:** If necessary for security reasons, for example to investigate, detect, prevent, and protect against misuses of our systems, we will process your personal data stored in our systems for this purpose.
- **Precise location services:** If you have given your consent for us to use your location data, we only process and keep your location data to provide you with the specific feature or functionality that use your location data, for example to allow you to locate a Topgolf Location near you.
- **Business transitions:** If it is necessary to process your personal data as a part of a corporate transaction, we will keep and process your personal data for this purpose for as long as necessary to carry out the specific business transition.
- **Cookies and similar technologies:** For information on how long we store cookies, please see our cookie preference management tool or contact us using the contact details set out above, see Section 12 (Contact Us).

YOUR RIGHTS

Under the GDPR and the UK GDPR, you have certain rights in relation to the use and processing of your personal data, including the right to:

- **Access** to and obtain a copy of your personal data together with additional information about our processing of your personal data.
- **Update** (rectification) of or request that we supplement your personal data if you consider that your personal data is incorrect, incomplete, or misleading.
- **Erasure** of your personal data in certain situations. Please note that some of our Topgolf Offerings allow you to delete your user account directly in the service.
- **Object** to our processing of your personal data, for example our processing of your personal data for direct marketing purposes or when we rely on a legitimate interest as the legal basis for the processing. You can at any time opt-out of receiving digital direct marketing communications from us, for example by clicking the unsubscribe link at the bottom of any e-mail you receive from us. Certain Topgolf Offerings allow you to adjust your communication preferences directly in the service. Please note that even if you have opted out of receiving digital direct marketing communication we can still contact you and send you digital communication that is deemed to be transactional, for example regarding updates to our policies and terms and conditions for the use of Topgolf Offerings.
- Request that our processing of personal data is **restricted** in certain situations, which means that you can, at least for a certain period, prevent us from processing your personal data (other than storing your personal data).
- Receive a copy of the personal data that you have provided to us in a structured and commonly used format and, where it is technically feasible, request that the personal data is transferred directly to an external recipient (**data portability**).
- **Withdraw your consent** to the processing of personal data based on your consent (without affecting the lawfulness of the processing carried out based on your consent before the withdrawal).
- **Lodge a complaint** with your supervisory authority. Contact details for national supervisory authorities in the EU are available [here](#). In the UK the supervisory authority is the Information Commissioner's Office (ICO). Contact details to the ICO are available [here](#).

Please note that certain rights only apply in certain situations, and that there are several exceptions to certain rights. As such, we may not always be able to comply with your request. Additionally, where a request is manifestly unfounded or excessive, we may choose to charge a reasonable fee to manage your request instead of refusing to act on the request. If for any reason we are unable to comply with your request, in whole or in part, we will inform you of this and the reason why we are unable to comply with your request. If you wish to exercise any of your rights, please contact us at the contact details set out above, see Section 12 (Contact Us). When you make a request to exercise your rights, we may need to ask you for additional information to verify your identity or to correctly find you in our systems. We only request the information that is reasonable and necessary for these purposes. We will respond to your request as soon as possible and normally within one (1) month of receiving your request. However, if your request is

complex or if you have made multiple requests, we may need additional time to manage your request. In such a case, we will inform you of this and the reason for the extension no later than one (1) month from the date we received your request.

AUTOMATED INDIVIDUAL DECISION-MAKING

We do not use automated individual decision-making, including profiling, in a way that produces legal effects concerning you or otherwise significantly affects you.

INTERNATIONAL TRANSFERS OF PERSONAL DATA

As explained in Section 9 (Cross-Border Transfers of Data) above, your personal data will be transferred to Topgolf in the U.S. in connection with the use of our Topgolf Offerings. In addition, some of our affiliates are also located outside the UK/EEA/EU. Transfers to Topgolf in the U.S. and to our affiliates outside the UK/EEA/EU are governed by our intra group agreement, which includes the EU Commission's standard contractual clauses for international transfers and a UK international data transfer agreement. In addition, our services providers, business partners and TTR Operators with whom you interact may be located outside of the UK/EEA/EU. In order to ensure an essentially equivalent level of protection for your personal data when transferred (or otherwise made available) to such recipients in third countries outside of the UK/EU/EEA, which do not provide an adequate level of protection, we normally rely on the EU Commission's abovementioned standard contractual clauses for international transfers (in addition to, when needed, UK international data transfer agreements. In addition, where necessary – in light of the law and practices of the country of destination – we implement supplementary technical and contractual measures to ensure that your personal data is protected regardless of where it is processed.

We also rely on so-called adequacy decisions issued by the European Commission where personal data is transferred to countries and recipients covered by such decision, please see the European Commission's website for more information on which countries that are covered by an adequacy decision. As an example, we rely on the [EU-U.S. Data Privacy Framework](#) for transfers to service providers in the U.S. that are certified under the framework, please see the framework website. For more information on the safeguards that we have taken to protect your personal data when we transfer personal data outside of the UK/EEA/EU, you may contact us at the contact details set out above, see Section 12 (Contact Us).

CHILDREN'S PRIVACY

Our Websites and Apps are directed to persons located in the UK/EEA/EU who are at least sixteen (16) years of age, and we do not knowingly collect any personal data from children in the UK/EEA/EU younger than the age of sixteen (16) years. If you are under the age of sixteen (16), you should not use our services or otherwise provide us with any personal data either directly or by other means. If a parent or guardian in the EEA is made aware that a child under the age of sixteen (16) years has provided us with personal data through any point of contact, please contact us using the contact details set out above, see Section 12 (Contact Us). If we have actual knowledge that personal data about a person in the EEA younger than the age of sixteen (16) years has been collected without parental/guardian consent, then we will take immediate and appropriate steps to delete such personal data.

COOKIES AND SIMILAR TECHNOLOGIES

We use cookies and similar technologies in our Topgolf Offerings. Cookies which are strictly necessary to provide you with the Topgolf Offering do not require your prior consent. Functional cookies, analytical or performance cookies and targeting cookies are only used if you have provided your prior consent to the use of these cookies by using the opt-in mechanisms available in the relevant Topgolf Offering. Where your personal data is collected using cookies and similar technologies, the processing of your personal data is based on the consent that you provided to the use of cookies, please see the table in the section Our Use of Personal Data and Legal Basis above. You can always withdraw your consent to the use non-essential cookies and to the processing of your personal data collected using such cookies by adjusting your preferences in the relevant Topgolf Offering. Please note, however, that if you do not provide or withdraw your consent to the use of non-essential cookies, we may not be able to provide you with certain functionality or features in the relevant Topgolf Offering. In addition, you may still receive and be shown advertisements, but the advertisements will not be tailored to your interest. For more information regarding the cookies that we use, the purposes of the cookies used and for how long the cookies are stored, please see our cookie preference management tool or contact us using the contact details set out above, see Section 12 (Contact Us).

CONTACT INFORMATION TO DATA PROTECTION OFFICER

Please find below contact information to our data protection officers.

UK:

Topgolf Limited, Attn: Privacy Team, Unit 8, Shepperton Business Park, Govett Avenue, England, TW17 8BA

EEA/EU:

Topgolf Sweden AB, Attn: Privacy, Svärdvägen, 11 4tr, SE-182 33 Danderyd, Sweden

NOTICE TO SOUTH KOREAN RESIDENTS

Certain specific privacy rights apply to you if you are a South Korean resident. These are set out in the following sections.

Legal basis for processing

Topgolf processes your personal data pursuant to the legal basis set forth in the “Purposes of processing and legal basis for processing” section of the Notice to European Economic Area/United Kingdom Residents for the purposes stated in Section 2 (Our Use of Personal Data) of this Privacy Notice. In addition to the foregoing, to the degree warranted or permissible under South Korean law, you consent to the processing of your personal data described in this Privacy Notice. In determining whether to additionally use or provide personal data without the data subject’s consent, we consider the following factors:

- Whether the purpose of the additional use or provision is related to the original purpose of collection;
- Whether the additional use or provision is foreseeable in light of the circumstances under which the personal data was collected or the processing practices;
- Whether the additional use or provision unfairly infringes upon the interests of the data subject; and
- Whether necessary measures to secure the safety of the personal data, such as pseudonymization or encryption, have been taken.

Users Younger Than Age 14

Our Websites and Apps are directed to persons in South Korea who are at least fourteen (14) years of age, and we do not knowingly collect any personal data from children in South Korea younger than the age of fourteen (14) years. If a parent or guardian in South Korea is made aware that a child under the age of fourteen (14) years has provided us with personal data through any point of contact, please call us at +1 (833) 554-0955 or write to us at the contact details above, and we will delete the personal data. If we have actual knowledge that personal data about a person in South Korea younger than the age of fourteen (14) years has been collected without parental/guardian consent, then we will take the appropriate steps to delete such personal data.

Destruction of Personal Data

The process and method for destroying personal data are set forth below:

- (1) Process of destruction: Topgolf selects the relevant personal data to be destroyed and destroy it with the approval of our Data Protection Officers (“DPO”).
- (2) Method of destruction: Topgolf destroys personal data recorded and stored in the form of electronic files by using a technical method (e.g., low level format) to ensure that the records cannot be reproduced, while personal data recorded and stored in the form of paper documents shall be shredded or incinerated.

Details of third parties with whom we share your information

If you are a South Korean resident, you may request information from us about how we may share certain categories of your personal data with third parties. We may provide third parties with personal data as set forth in Section 3 (Our Disclosure of Personal Data) above. For additional information, including about specific parties to which we disclose your personal data, please contact us using the Contact Us information.

Collection and Transfer of Information Overseas

We collect and process personal data outside of Korea in order to provide the Topgolf Offerings. Countries where personal data is collected and processed: United States. The Company transfers Personal Information to third parties located outside of Korea as specified in Section 9 (Cross-Border Transfer of Data). If a User does not want the Company to transfer his/her Personal Information overseas, the User can refuse such transfer by not agreeing to the collection or use of Personal Information. However, if a User refuses cross-border transfer of his/her Personal Information, the Company will be unable to provide the User with a part or all of the Services.

Rights of data subjects in relation to his or her personal data

Notwithstanding Section 4 (Your Privacy Choices) of the Privacy Notice, the following provisions will apply to customers located or residing in South Korea. You (and your legal representative) have statutory rights under the PIPA, including the right to access, rectification, erasure, suspension of processing and withdrawal of consent. You (or your legal representative) can exercise such rights by contacting us at the contact details set out above (see Section 12, Contact Us).

Automated Decision-making

For residents of South Korea, we do not use automated decision-making without human intervention, including profiling, in a way that produces legal effects concerning you or otherwise significantly affects you.

Security measures implemented by Topgolf

Notwithstanding Section 7 (Security of Personal Data) of the Privacy Notice, the following provisions will apply to customers located or residing in Korea. Topgolf implements the following technical, managerial, and physical measures necessary to ensure the security of the personal data.

Managerial measures: Designation of a DPO, establishment and implementation of an internal management plan, regular training of employees on protection of personal data, etc.

Technical measures: Management of the right to access the personal data processing system, installation of an access control system, installation of security programs, etc.

Physical measures: Restriction on access to Personal data storage mediums such as the computer room and data storage room, etc.

Collection of Opinions and Handling of Complaints

If you have any questions regarding this Privacy Notice, you may raise your questions with us as detailed above (see Section 12, Contact Us).

NOTICE TO UNITED STATES RESIDENTS

These disclosures supplement the information contained in our Privacy Notice by providing additional information about the privacy rights available to individual residents of certain states in the United States and our personal data processing practices relating to those individuals. For a detailed description of how we collect, use, disclose, and otherwise process personal data, please read our Privacy Notice.

Nevada Residents

Nevada S.B. 220 provides consumers with the ability to opt out of the sale of their personal data. We do not sell your personal data as defined in S.B. 220. However, you may still submit an opt-out request, and if our practices were to change in the future, we would honor your request. If you are a Nevada resident and would like to opt out of the sale of your covered information, your request must be submitted by calling toll-free at (833) 554-0955 or writing to us at the following mailing address: Topgolf, Attn: Privacy Team, 8750 N. Central Expressway, Suite 1200 Dallas, U.S.A. TX 75231. Your request must include your full

name, street address, city, state, zip code, and a valid email address so that we can contact you if needed regarding your request. If you previously provided a phone number, including it will assist us in making sure we identify you as someone who wants to opt out. You may be required to take reasonable steps as we determine from time to time to verify your identity and/or the authenticity of your request

Residents of States with Comprehensive Privacy Laws

We disclose all of the categories of personal data we collect to the categories of recipients set forth in the Our Disclosure of Personal Data section of our Privacy Notice. Our disclosure of personal data to the following categories of third parties qualifies as the sale of personal data or the sharing or processing of personal data for targeted advertising under certain privacy laws:

- **Third-Party Advertising and Analytics Providers:** Transaction Information; Device Information; Interaction Information; Information about your Interests, Preferences and Performance; demographic data; Photo/Video data and User Generated Content
- **Business Partners:** Transaction Information; Device Information; Interaction Information; Information about your Interests, Preferences and Performance; demographic data; Photo/Video data and User Generated Content
- **Social Media Platforms:** Transaction Information; Device Information; Interaction Information; Information about your Interests, Preferences and Performance; demographic data; Photo/Video data and User Generated Content

Depending on your state of residency and subject to certain legal limitations and exceptions, you may be able to limit or opt-out of the sale of personal data or the processing of personal data for purposes of targeted advertising (as described in the Your Additional U.S. Privacy Choices section below). Please note we do not sell the personal data of individuals we know to be less than 16 years of age or share such information for targeted advertising purposes.

Sensitive Personal Data

The following personal data elements we collect may be classified as “sensitive” under certain privacy laws:

- Government ID numbers, including social security number, driver’s license number, state identification card number, or passport number.
- Health data, including information regarding an individual’s mental or physical health condition. If you are a person in Washington or Nevada, please see our Washington and Nevada Consumer Health Privacy Notice for additional information.
- Precise geolocation data

We use sensitive personal data for the purposes set forth in the Our Use of Personal Data section of our Privacy Notice. We do not sell sensitive personal data, and we do not process or otherwise share sensitive personal data for the purpose of targeted advertising. However, depending on your state of residency and

subject to certain legal limitations and exceptions, you may be able to limit, or withdraw your consent for, our processing of sensitive personal data (as described in the Your Additional U.S. Privacy Choices section below).

Automated Decision-Making and Profiling

We do not conduct automated processing of personal data for the purposes of evaluating, analyzing, or predicting an individual's personal aspects in furtherance of decisions that produce legal or similarly significant effects. As a result, we do not provide a right to exercise control over such forms of automated decision-making and profiling.

Your Additional U.S. Privacy Choices

Depending on your state of residency and subject to certain legal limitations and exceptions, you may be able to exercise some or all of the following rights:

- **Right to Know:** The right to confirm whether we are processing personal data about you and, for residents of California and Oregon only, to obtain certain personalized details about the personal data we have collected about you, including: The categories of personal data collected; The categories of sources of the personal data; The purposes for which the personal data were collected; The categories of personal data disclosed to third parties (if any), and the categories of recipients to whom this personal data were disclosed; The categories of personal data shared for targeted advertising purposes (if any), and the categories of recipients to whom the personal data were disclosed for these purposes; The categories of personal data sold (if any) and the categories of third parties to whom the personal data were sold; and For Oregon residents only, a list of specific third parties to whom personal data have been disclosed.
- **Right to Access & Portability:** The right to obtain access to the personal data we have collected about you and, where required by law, the right to obtain a copy of the personal data in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the data to another entity without hindrance.
- **Right to Correction:** The right to correct inaccuracies in your personal data, taking into account the nature of the personal data and the purposes of the processing of the personal data.
- **Right to Control Over Sensitive Personal Data:** The right to exercise control over our collection and processing of certain sensitive personal data.
- **Right to Control Over Automated Decision-Making / Profiling:** The right to direct us not to use automated decision-making or profiling for certain purposes.
- **Right to Opt-Out of Targeted Advertising:** The right to direct us not to use or share personal data for certain targeted advertising purposes. To disable sharing through cookies set by third parties that may be considered targeted advertising under such laws, please adjust your settings by clicking the link in the footer titled "Manage Cookie Preferences".

- **Right to Opt-Out of Sales:** The right to direct us not to sell personal data to third parties, including the right to opt-out of the disclosure of personal data to third parties for the third parties' direct marketing purposes under California's "Shine the Light" Law.
- **Right to Deletion:** The right to have us delete personal data we maintain about you.
- **Right to Appeal:** The right to submit an appeal regarding our decision about your request. You can do so by submitting [this form](#). Please include your full name, the basis for your appeal, and any additional information to consider.

Depending on your state of residency, you may also have the right to not receive retaliatory or discriminatory treatment in connection with a request to exercise the above rights. However, the exercise of the rights described above may result in a different price, rate or quality level of product or service where that difference is reasonably related to the impact the right has on our relationship or is otherwise permitted by law.

Submitting Privacy Rights Requests

Please submit a request specifying the right you wish to exercise by:

- Completing our form found [here](#); or
- Calling our toll-free U.S. telephone number: (833) 554-0955.

To exercise your right to opt-out as it relates to the use of cookies and related technologies that involve the sale of personal data or the use of personal data for targeted advertising purposes, please click the "Manage Cookies" link in the footer of the website and adjust your preferences accordingly. If you are visiting our site with the Global Privacy Control enabled, any cookies that constitute sales or are used for targeted advertising should already be turned off automatically in our cookie preference manager. Please note this opt-out tool is website, device, and browser specific, so you will need to change your preferences on each device and browser you use to interact with the specific website you are visiting. You may also follow the other steps set forth in the Automatic Data Collection Preferences and Targeted Advertising Preferences section of the Your Privacy Choices section of our Privacy Notice to further exercise control over automatic data collection technologies.

Before processing your request to exercise certain rights (including the Right to Know, Access & Portability, Correction, and Deletion), we will need to verify your identity and confirm you are a resident of a state that offers the requested right(s). As a result, we require requests submitted through our online form and toll-free number to include first and last name, email address, phone number, state of residency, zip code and information about your history with us. If we are unable to verify that the individual submitting the request is the same individual about whom we have collected information (or someone authorized by that individual to act on their behalf), we will not be able to process the request.

Submitting Authorized Agent Requests

If you are an authorized agent submitting a request on a user's behalf, please complete the applicable request per the instructions below. You may also make a request on behalf of your minor child. We will follow up to request a signed, written permission signed by the individual who is the subject of the request

authorizing you to make the request on their behalf. The written permission must state your full legal name, the full legal name of the individual who is the subject of the request and needs to be clear about the permission granted. Alternatively, you may submit a copy of a power of attorney under Probate Code sections 4000-4465. In either case, please also indicate the nature of your request. The consumer's identity, in addition to your own, will need to be independently verified in order for us to be able to fulfill your request. Depending on the evidence provided and your state of residency, we may still need to separately reach out to you to confirm the authorized agent has permission to act on your behalf and to verify your identity in connection with the request.

Additional California-Specific Disclosures

California Categories of Personal Data: California law requires we provide disclosures to you about what personal data we collect by reference to the enumerated categories of personal data set forth within California law. To address this obligation, we have identified the relevant enumerated California personal data category for the personal data described in the Our Collection and Use of Personal Data section of our Privacy Notice below:

- **Identifiers**, such as name, contact information, and online or device identifiers.
- **Protected classification characteristics**, such as age, sex (including gender), national origin, citizenship, and marital status.
- **Commercial information**, such as payment information you provide for goods, services, customer service records, and information about the products you have purchased.
- **Internet / network information**, such as information about the web browser and operating system you are using, the website or ad that referred you to the Topgolf Offerings, areas of the Topgolf Offerings that you visited, and terms entered into a search engine that led you to the Topgolf Offerings.
- **Geolocation data**, such as specific location, e.g., longitude/latitude coordinates from a global positioning system (GPS).
- **Sensory information**, such as images, video, or audio recordings
- **Professional / employment information**, such as current and past employers.
- **Sensitive personal data**, such as government ID numbers, health data, and precise geolocation data.
- **Inferences**, such as your perceived interests, preferences, characteristics or behavior.

The personal data we collect about you will depend upon how you use the Topgolf Offerings or otherwise interact with us. Accordingly, we may not collect all of the information above about you.

California's "Shine the Light" Law: California's "Shine the Light" law (Civil Code Section §1798.83) provides certain rights to California residents that have an established business relationship with us with regard to the disclosure of certain types of personal data to third parties for their direct marketing purposes. It is company policy that we do not disclose personal data to third parties for their direct marketing purposes if a consumer has exercised their right to opt out. To opt out of having your personal data disclosed to third parties for their direct marketing purposes, please follow the instructions for opting out of targeted advertising and personal data sales (above).

Notice of Financial Incentive: Under California regulation, certain programs we offer that provide benefits to consumers may be considered financial incentive or loyalty programs. We may collect personal data from you in connection with these programs, for example contact information (name, email address, residential address) and certain commercial information for a number of reasons, including to administer the program, contact you with regard to your account (if any), to provide the benefits to you, to better serve you, and to fulfill your requests associated with the program. The third parties that may receive access to your personal data in connection with any program or offering are our program partners. To the extent that we provide a program that may be considered a financial incentive because the program is directly or reasonably related the collection, deletion or sale or retention of consumer personal data, we have determined the value is reasonably related to the overall value we receive from the personal data participants provide specific to the program, based on our reasonable but sole determination. We estimate the value of the personal data we would receive and otherwise process in connection with these programs and offerings by considering the expense we would incur in collecting and processing the personal data, as well as the expenses related to facilitating the program or offering. To opt into the programs, you may need to provide certain information, register for an account and agree to the applicable program terms, or otherwise follow the instructions associated with that applicable program. Please also see the terms of the program you are joining for additional description of the program and any additional requirements. Participation in our programs is voluntarily, and you can withdraw at any time by following the instructions provided in connection with each offering or calling (833) 554-0955.

WASHINGTON AND NEVADA CONSUMER HEALTH DATA PRIVACY NOTICE

Last Updated: May 13, 2026

This Consumer Health Data Privacy Notice (the “Consumer Health Notice”) applies to residents of Washington State and Nevada and individuals whose Consumer Health Data (as defined below) is collected in Washington State and Nevada by us through any of our Websites or the related content, products, services, platforms and other functionality offered on or through the Topgolf Offerings. This Consumer Health Notice supplements the Privacy Notice set forth above and explains how we use and disclose your Consumer Health Data. This Consumer Health Notice does not address privacy practices relating to Topgolf job applicants, employees, or other personnel. Please note that this Consumer Health Notice is not a contract and does not create any legal rights or obligations not otherwise provided by law. Changes to this Consumer Health Notice will be made according to the process described in Section 13, Changes in our Privacy Notice, above.

a. Our Collection and Use of Consumer Health Data

The term “Consumer Health Data” as used in this Consumer Health Notice means any personal data that is linked or reasonably linkable to you and that identifies your past, present, or future physical or mental health status as defined in the Washington My Health My Data Act or the Nevada Consumer Health Data Privacy Law (collectively, the “Laws”). Consumer Health Data does not include information that is considered deidentified under the MHMD Act. Additionally, Consumer Health Data does not include Protected Health Information (as defined by HIPAA). The data we collect depends on the context of your interactions with us and, in most cases, is information that you decide to share with us. Consumer Health Data does not include information that is considered deidentified under the Laws. Examples of Consumer

Health Data that Topgolf may collect include: Information you share about your health-related conditions, symptoms, experiences, diagnoses, accessibility requirements, testing, or treatments. Golf performance information, including swing data.

We may process Consumer Health Data that we collect from you by methods including, but not limited to, collecting, using, storing, organizing, combining, erasing, filtering, and transmitting data in accordance with this Consumer Health Notice. With your permission, we may process and/or use Consumer Health Data that we collect from you to deliver the Topgolf Offerings to you, including for the following purposes: To fit you for products. To provide accessible accommodations. To provide emergency services if applicable. To create anonymous, aggregated, or de-identified data.

b. Sources of Consumer Health Data

The Consumer Health Data we collect depends on the context of your interactions with the Topgolf Offerings and, in most cases, is information that you decide to share with us.

c. Our Disclosure of Consumer Health Data

We may share the categories of Consumer Health Data set forth above with the following third parties:

- **Service Providers:** We work with a variety of service providers who help us process your Consumer Health Data, such as to facilitate the operation of our Websites and the Topgolf Offerings.
- **Business Transactions:** We may take part in or be involved with a business transaction, such as a merger. We may disclose Consumer Health Data to a third-party during the negotiation of or in connection with such a transaction but, to the extent permitted by applicable law, we will only disclose Consumer Health Data upon the third party agreeing to the same or stronger protections for your Consumer Health Data than are set forth in this Consumer Health Notice.
- **Legal Obligations and Rights:** We may disclose Consumer Health Data to third parties: in connection with the establishment, exercise, or defense of legal claims; to comply with laws or to respond to lawful requests and legal processes; to protect our rights and property and the rights and property of others, including to enforce our agreements and policies; to detect, suppress, or prevent fraud; to protect the health and safety of us and others; or as otherwise required by applicable law.
- **With Your Consent:** We may disclose Consumer Health Data about you to certain other third parties or publicly with your consent or at your direction.

d. Your Privacy Rights

The Laws provide the following rights with respect to Consumer Health Data we collect about you:

- **Right to Access / Confirm:** You may have the right to confirm whether we are collecting, sharing, or selling Consumer Health Data about you and with whom we may be disclosing such Consumer Health Data, and to access such data.
- **Right to Withdraw Consent:** If you have provided your consent for our processing or sharing of your Consumer Health Data, you may have the right to withdraw your consent.
- **Right to Delete:** You may have the right to request that we delete your Consumer Health Data and that all third parties to whom we have disclosed your Consumer Health Data delete such data.

To exercise any of the privacy rights set forth above or to review or request changes to data, please submit a request by: Calling us at (833) 554-0955, or clicking “Your Privacy Choices” in the footer of our Website. Before processing your request, we will need to authenticate your identity. To authenticate your identity, we will generally require matching a minimum amount of information you provide us with the information we maintain about you in our systems. This process may require us to request additional information from you, including, but not limited to, your email address and phone number. In certain circumstances, we may decline a request to exercise the rights described above, particularly where we are unable to authenticate your identity or locate your information in our systems. If we are unable to comply with all or a portion of your request, we will explain the reasons for our decision. If your request to exercise a right under the Laws is denied, you may appeal that decision by contacting us. If the appeal is unsuccessful, you may raise a concern or lodge a complaint with the applicable attorney general: Washington:

www.atg.wa.gov/file-complaint ; Nevada: ag.nv.gov/Complaints/File_Complaint/

e. Changes to This Consumer Health Notice

This Consumer Health Notice is current as of the Last Updated date set forth above. We may change this Consumer Health Notice from time to time, so please be sure to check back periodically. We will post any changes to this Consumer Health Notice on our Websites.