

# Privacy Policy

The protection of your data is a top priority for our team. We therefore process your personal data with respect to your use of our BallTracking Service and PuttView Books App only in compliance with the terms of this Privacy Policy as well as the provisions of the EU General Data Protection Regulation (GDPR) and the German Federal Data Protection Act (BDSG).

## 1. Name and contact details of controller

This privacy information pertains to data processing by

Viewlicity GmbH  
Barnerstraße 14B  
22765 Hamburg  
Phone: +49 176 70682670  
Email: info@puttview.com

## 2. Collection, storage of personal data as well as type and purpose of data use

### 2.1. Managing your account and use of our BallTracking Service

If you register for BallTracking Service, we will ask you to provide, and we may collect and process for use of BallTracking Service the following information:

- Contact details of users:  
First name, last name, company, email address
- Account details of users:  
Sex, birthday, nationality, right-/lefthanded, handicap, user type (coach/player), coach/player pairings, data on the use of service (protocol data), version of privacy policy accepted, location data, data on hardware setup

In addition we may collect and process the following information in connection with your use of our BallTracking Service:

- Information on tracked and intended putts, data on the use of service (protocol data, including data on sessions and time stamps), location data, data on hardware setup

This data is processed in response to your request and processing is required to ensure adequate service and for fulfillment of our contractual obligations according to Art. 6 (1), sentence 1, lit. b, GDPR, if any, with you personally. If there are no such contractual obligations, the processing of data is based on our legitimate interest according to Art. 6 (1), sentence 1, lit. f, GDPR for the purpose to ensure the service.

### 2.2. Managing your account and use of our PuttView Books App

If you register for our PuttView Books App, we will ask you to provide, and we may collect and process for use of the PuttView Books App the following information:

- Contact details of users:  
First name, last name, email address
- user type (coach/player):

This data is processed in response to your request and processing is required to ensure adequate service and for fulfillment of our contractual obligations according to Art. 6 (1), sentence 1, lit. b, GDPR, if any, with you personally. If there are no such contractual obligations, the processing of data is based on our legitimate interest according to Art. 6 (1), sentence 1, lit. f, GDPR for the purpose to ensure the service.

### **2.3. Artificial intelligence**

In order to train an artificial intelligence to develop and improve our service, we may, in connection with your use of BallTracking Services, collect and subsequently pseudonymize and process the following information:

- Sex, birthday, nationality, right-/lefthanded, handicap, user type (coach/player), coach/player pairings, information on tracked and intended putts, data on the use of service (protocol data including data on sessions and time stamps), location data, data on hardware setup

Pseudonymization within the meaning of Art. 4, No. 5, GDPR, means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures to ensure that the personal data are not attributed to an identified or identifiable natural person. The artificial intelligence shall detect patterns in each user's putting data to provide an automated and objective evaluation system for each user's putting skills and shortcomings. The results of this evaluation shall be used to offer the user personalized feedback.

The legal basis for the processing of personal data is Art. 6 (1), sentence 1, lit. f, GDPR. Our legitimate interest is derived from the aforementioned purposes.

### **2.4. User trainings**

In connection with your use of BallTracking Services we may collect and process the following data to create user profiles, and use the automated processing of such data to evaluate and analyze the user's putting in order to offer individual training to such user:

- Sex, birthday, nationality, right-/lefthanded, handicap, user type (coach/player), coach/player pairings, information on tracked and intended putts, data on the use of service (protocol data), location data, data on hardware setup

The legal basis for the processing of personal data is Art. 6 (1), sentence 1, lit. f, GDPR. Our legitimate interest is derived from the aforementioned purposes.

### **2.5. Marketing**

In connection with your use of BallTracking Services we may collect and process in pseudonymized form the following data for automated processing to derive statistics and facts on putting for providing non-personal statistical information to customers, market participants and specialized media:

- Sex, birthday, nationality, right-/lefthanded, handicap, user type (coach/player), coach/player pairings, on tracked and intended putts, data on the use of service (protocol data), location data, data on hardware setup

The legal basis for the processing of personal data is Art. 6 (1), sentence 1, lit. f, GDPR. Our legitimate interest is derived from the aforementioned purposes.

### **3. Deletion of personal data**

The personal data we collect in the context of the BallTracking Service and PuttView Books App will be stored until your account is no longer registered and will then be deleted, unless we are obligated to comply with longer storage requirements due to retention and documentation duties based on statutory regulations pursuant to Art. 6 (1), sentence 1, lit. c, GDPR, if further processing is required due to ongoing legal disputes, or if you have consented to further storage pursuant to Art. 6 (1), sentence 1, lit. a, GDPR.

### **4. Data disclosure to third parties**

Your personal data will be disclosed to third parties for the purposes listed below, if:

- You have given your explicit consent according to Art. 6 (1), sentence 1, lit. a, GDPR;
- The disclosure according to Art. 6 (1), sentence 1, lit. f, GDPR is necessary for the assertion, exercise or defense of legal claims and there is no reason to assume that you have an overriding legitimate interest in not disclosing your data;
- In the event that there is a legal obligation to pass on your data according to Art. 6 (1), sentence 1, lit. c, GDPR;
- This is legally permissible and required for the execution of contractual relationships (if any) with you according to Art. 6 (1), sentence 1, lit. b, GDPR; and
- Processed by commissioned data processing within the meaning of Art. 28 GDPR.

### **5. Rights of users**

You have the following rights:

- To obtain information from us about the personal data we process according to Art. 15 GDPR. In particular, you may request information about the purposes of the processing, the categories of personal data, the categories of recipients to whom your personal data have been or will be disclosed, the envisaged period for which the personal data will be stored, the existence of the right to request rectification, erasure, restriction of processing or to object, the right to lodge a complaint, the source of your data if they were not collected by us, as well as the existence of automated decision-making, including profiling, as well as meaningful information about the associated details;
- To request without delay the rectification of incorrect or incomplete personal data stored by us according to Art. 16 GDPR;
- To request, according to Art. 17 GDPR, the erasure of personal data stored with us, unless the processing is necessary for exercising the right of freedom of expression and information, full compliance with legal obligations, for reasons of public interest, or for the establishment, exercise or defense of legal claims;
- To request restriction of processing your personal data according to Art. 18 GDPR, if you contest the accuracy of the data, if the processing is unlawful but you oppose the erasure of the data, and if we no longer need the personal data but you require them for the establishment, exercise or defense of legal claims, or if you exercised your right to object to processing according to Art. 21 GDPR;
- To request your personal data, which you have provided to us, in a structured, commonly used and machine-readable format or to demand the transmission to another controller according to Art. 20 GDPR; and
- To lodge a complaint with a supervisory authority in accordance with Art. 77 GDPR. You can generally contact the supervisory authority at your usual place of residence or workplace or at our seat for this purpose.

## **6. Right to object**

To the extent your personal data is processed on the basis of legitimate interests pursuant to Art. 6 (1), sentence 1, lit. f, GDPR, you have the right to object to the processing of your personal data pursuant to Art. 21, GDPR on grounds relating to your particular situation. Please note that in this case there may be limitations to the use of our BallTracking Service and/or the PuttView Books App. To exercise this right to object, it is sufficient to send an email to [info@puttview.com](mailto:info@puttview.com).