# **Privacy Policy**

Last Updated: 26 June 2025

#### 1. Who We Are

GolfSwing.ie is a trading name of SWOT Digital Limited, registered in Ireland under company number 543037.

Registered Address: Harcourt Centre, Block 4, Regus House, Harcourt Road, Dublin 2, D02 HW77

Email: info@golfswing.ie

SWOT Digital Limited is the Data Controller responsible for your personal data.

#### 2. What Data We Collect

Golf Professionals: Name, email address, phone number, location, golf qualifications, profile image, biography

Golfers: Name, email address, phone number, golf handicap

All Users: IP address, Cookies and browser behaviour via Google Analytics and Google Ads

## 3. Optional Profile Data

Golf professionals may choose to upload optional data like profile image, biography, location, and golf qualifications.

This is processed based on explicit consent and publicly viewable. It can be removed at any time by contacting

info@golfswing.ie.

## 4. How We Use Your Data and Legal Basis

Creating listings, accounts: Contractual necessity

Communication: Legitimate interest

Payments: Contractual necessity

Marketing & Advertising: Consent

Displaying optional data: Consent

## 5. Marketing and Consent

Marketing is only sent with opt-in consent. Consent can be withdrawn at any time via unsubscribe or by contacting info@golfswing.ie.

## 6. Cookies and Tracking

# **Privacy Policy**

Used to improve experience and collect analytics. Consent managed via CookieYes banner. Analytics and marketing cookies require opt-in.

## 7. Children's Privacy and Parental Consent

Users under 16 must have parental/guardian consent. This is confirmed via checkbox during registration. No date of birth is collected.

#### 8. Data Sharing

Stripe, Mailchimp, Gmail, Google Analytics/Ads, Xero, and Hubspot. All are GDPR-compliant and only act under our instruction.

#### 9. Contractors and International Access

Contractors in Portugal (EEA) and Serbia (non-EEA) may access data. Serbia access is safeguarded using Standard Contractual Clauses (SCCs).

#### 10. International Data Transfers

Data may be transferred outside the EEA (e.g. US). Safeguards include SCCs and adequacy decisions. Users are referred to third-party privacy policies.

#### 11. Data Retention

Golfers: 2 years of inactivity; Golf professionals: 6 months after deactivation; Analytics: 26 months.

#### 12. Data Security

SSL encryption, password protection, and secure providers used.

## 13. Your Rights Under GDPR

Access, rectify, delete, restrict, object to processing, withdraw consent, lodge complaint with Data Protection Commission. Contact: info@golfswing.ie

## 14. Automated Decision-Making

Not used. Segmentation via ad platforms may occur with consent.

# **Privacy Policy**

## 15. External Links

We are not responsible for third-party websites linked from our site.

# 16. Changes to This Policy

We notify users of material changes via email or banner.

# 17. Contact Us

GolfSwing.ie (SWOT Digital Limited) - Email: info@golfswing.ie