

PRIVACY POLICY

Hoakalei Country Club ("Hoakalei") is committed to safeguarding your privacy while visiting our website at www.hoakaleicountryclub.com ("Website"). Our goal is to provide you with an internet experience that delivers the information, resources and services that Hoakalei has to offer and is relevant to your needs. To achieve this goal, part of the operation of the Website includes gathering certain types of information about Website users. We understand that your privacy is important, and this policy describes the types of information we may collect from you or that you may provide when you visit the Website and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies to information we collect:

- On this Website, as voluntarily provided by you.
- In email, text, and other electronic messages based on a request you have made via this Website.
- When you interact with our advertising on third-party websites and services, if those applications or advertising include links to this policy.

It does not apply to information collected by:

- Any third party, including through any application or content that may link to or be accessible from or on the Website.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you agree to this privacy policy. This policy may change from time to time (see *Changes to Our Privacy Policy*). Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

CHILDREN UNDER THE AGE OF 16

Hoakalei has designed this Website to be used for informational purposes by all ages. However, as with any Website parental consent is encouraged. No one under age 16 may provide any information to us via the Website. We do not knowingly collect personal information from children under 16. If you are under 16, do not use any of the data entry portals, forms, or other features on this Website or provide any information about yourself to us, including your name, address, telephone number, email address or any other information. If we learn we have collected or received personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us.

INFORMATION WE COLLECT ABOUT YOU AND HOW WE COLLECT IT

We collect several types of information from and about users of our Website, including information:

- By which you may be personally identified, such as name, mailing address, e-mail address, telephone numbers, or any other identifier by which you may be contacted online or offline ("personal information");
- That is about you but individually does not identify you, such as company or organization affiliation, nationality, preferred language and currency, dates and details of travel, and special needs, requests, or comments; and/or
- About your internet connection, the equipment you use to access our Website, and usage details.

We collect this information:

- Directly from you when you provide it to us.
- Automatically as you navigate through the Website. Information collected automatically may include usage details, IP addresses, and information collected through internet browser cookies and other tracking technologies.
- From third parties, for example, our affiliates and business partners.

INFORMATION YOU PROVIDE TO US

The information we collect on or through our Website may include:

- Information that you provide by filling in forms on our Website. For example, this includes information you provide when you request to visit our club, play our course, make a dining reservation, receive additional information, opt to receive notifications about exclusive promotions and special events presented by Hoakalei and its related companies, including its parent company Sankara Hawaii LLC, or request further services. We may also ask you for information in connection with your requested service, and when you report a problem with our Website or enter a contest or promotion sponsored by us.
- Records and copies of your correspondence (including email addresses), if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.
- Details of transactions you request or carry out through our Website and of the fulfillment of your reservations and orders. You may be required to provide financial information before placing an order through our Website.
- Your search queries on the Website.

INFORMATION WE COLLECT THROUGH AUTOMATIC DATA COLLECTION TECHNOLOGIES

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking).

The information we collect automatically is only statistical data and does not include personal information. It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Website.
- The technologies we use for this automatic data collection may include:
 - Cookies (or browser cookies). A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.
 - Flash Cookies. Certain features of our Website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Website. Flash cookies are not managed by the same browser settings as are used for browser cookies. For information about managing your privacy and security settings for Flash cookies, see *Choices About How We Use and Disclose Your Information*.
 - Web Beacons. Pages of our Website and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit Hoakalei, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

THIRD-PARTY USE OF COOKIES AND OTHER TRACKING TECHNOLOGIES

Hoakalei may provide links to other websites that we believe might offer you useful information and services. However, those sites may not follow the same privacy policies of Hoakalei. We are not responsible for the privacy policies or the actions of third parties, including without limitation, any website owners whose sites may be reached through this Website, nor can we control the activities of those websites. We recommend you access the on-line policies of the parties controlling those websites to learn about their data collection practices before submitting any personal information or other sensitive data.

Services on our Website may be provided by third-party contractors. These third parties may use tracking technologies such as cookies or web beacons to collect information about you when you use their platforms or applications on our Website. The information they collect may be associated with your personal information or they may collect information about your online activities over time. We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an

advertisement or other targeted content, you should contact the responsible provider directly. For information about how you can opt out of receiving targeted advertising from many providers, see *Choices About How We Use and Disclose Your Information*.

HOW WE USE YOUR INFORMATION

We use information that we collect about you or that you provide to us, including any personal information:

- To present our Website and its contents to you.
- To provide you with information, products, or services that you request from us.
- To fulfill any other purpose for which you provide it.
- To provide you with notices about your membership accounts.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our Website or any products or services we offer or provide through it.
- To allow you to participate in interactive features on our Website.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

We may also use your information to contact you about Hoakalei's exclusive promotions and special events that may be of interest to you, and those of our related companies, including our parent company Sankara Hawaii LLC, and its subsidiaries and affiliates. If you do not want us to use your information in this way, please check the relevant box located on the form on which we collect your data. For more information, see *Choices About How We Use and Disclose Your Information*.

We may use the information we have collected from you to enable us to display advertisements to our advertisers' target audiences. Even though we do not disclose your personal information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

DISCLOSURE OF YOUR INFORMATION

Hoakalei may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We will only disclose personal information that we collect or you provide as described in this privacy policy:

- To our related parties, including our parent company Sankara Hawaii LLC and its subsidiaries and affiliates, for promotional purposes of their exclusive promotions and special events you may enjoy.
- To contractors, service providers, and other third parties we use to support our business, as needed to fulfill the purpose of their business service. Hoakalei does not disclose information to unrelated parties for advertising purposes.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Hoakalei's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Hoakalei about our Website users is among the assets transferred.
- To fulfill the purpose for which you provide it. For example, if you provide an email address or phone number to contact you with when you request a reservation at Reflections Restaurant via the form on our Website, we will transmit the contents of that email and your email address to the Reflections Restaurant staff.
- For any other purpose disclosed by us when you provide the information.
- With your consent.
- We may also disclose your personal information:
 - To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
 - To enforce or apply our terms of play time reservation, sale of goods and other services, and other agreements, including for billing and collection purposes.
 - If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Hoakalei, our customers, or others, including the unauthorized use of this Website. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

CHOICES ABOUT HOW WE USE AND DISCLOSE YOUR INFORMATION

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- Tracking Technologies and Advertising. You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.
- Promotional Offers from Hoakalei and Related companies. If you do not wish to have your email address/contact information used by Hoakalei or its related companies to promote exclusive promotions and special events, you can opt out by checking the relevant box located on the form on which we collect your data, by contacting us by telephone at (808) 853-4343, or by sending a letter to 91-1620 Keoneula Blvd, Ewa Beach, HI 96706 stating your request. If we have sent you a promotional email, you may send us a return email asking to be omitted from future promotional email distributions. This opt-out does not apply to information provided to Hoakalei by means other than via our Website, during activities such as a purchase, registration, service experience or other transaction.

We do not control third parties' collection or use of your information to serve interest-based advertising. However these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative on their website at <https://optout.networkadvertising.org/?c=1#%2F>

Users may have additional personal information rights and choices depending on the jurisdiction of their residency. If you have questions about your specific situation, please contact us by telephone at (808) 853-4343 or by letter to 91-1620 Keoneula Blvd, Ewa Beach, HI 96706.

ACCESSING AND CORRECTING YOUR INFORMATION

You may also contact us by telephone at (808) 853-4343 or by sending a letter to 91-1620 Keoneula Blvd, Ewa Beach, HI 96706 to request access to, correct or delete any personal information that you have provided to us. We cannot delete your personal information except by also deleting any membership account you might have, and we may not be able to delete your personal information in cases where we must use it to fulfill a pending service ordered by you or for another legitimate business reason requiring retention of such information. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

DATA SECURITY

Hoakalei has implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls. Any payment transactions will be encrypted using SSL technology.

The safety and security of your information also depends on you. We ask you to take care in using non-private computers and devices and in safeguarding your information.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

CHANGES TO OUR PRIVACY POLICY

It is our policy to post any changes we make to our privacy policy and the date the privacy policy was last revised, at the bottom of the page. You are responsible for periodically visiting our Website and this privacy policy to check for any changes.

CONTACT INFORMATION

To ask questions or comment about this privacy policy and our privacy practices, contact us by telephone at (808) 853-4343 or by sending a letter to 91-1620 Keoneula Blvd, Ewa Beach, HI 96706.

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