

California Yacht Club Privacy Policy

Effective date: December 31, 2019

The California Yacht Club (“CYC,” “us”, “we”, or “our”) operates the <http://www.calyachtclub.com> website, and affiliated websites (“Websites”), and provides various other services to our CYC members and reciprocal club members, including but not limited to: our Club Dining services; our boat mooring services; our on the water activities including sailing, rowing, racing, regatta, and other on the water events and activities (“On the Water” activities), our CYC activities and communities, such as our Sportsman’s Club, Women’s Association, Young Professionals, SCUBA Club, Radio Amateur Group and other CYC activities, groups, and committees (“Club Activities”); private events hosted at CYC facilities; and other services and amenities associated with your CYC or reciprocal club membership that we may provide or make available to you (hereinafter collectively referred to as our “Services”).

This Privacy Policy informs you of our policies regarding the collection, use and disclosure of your data – including your Personal Information – when you use our Services, and the choices you have associated with that data.

Our Privacy Policy is designed to advise you about how we collect, use, protect, and disclose the information that we collect and/or receive about you. It also explains your privacy rights, and how you can manage the privacy of your Personal Information. Please note that this Privacy Policy does not govern the practices of third parties, including our partners, third party business facilitation partners, and/or advertisers, even when those services are branded as, or provided on behalf of, CYC. Information collected from you by others, such as third party websites that you access through links on the Website, are governed by those entities’ privacy policies.

CYC is affiliated with the LA Athletic Club (“LAAC”). CYC members enjoy access to certain LAAC member services, benefits, and amenities as part of their CYC membership. LAAC also provides certain administrative and IT-related services for CYC as part of this relationship. As part of this relationship, CYC and LAAC may share members’ and guests’ information with one another. Please note that any information collected by LAAC is governed by LAAC’s privacy policy, which can be found at <http://laac.com/privacy/>.

I. Definitions

- **Personal Information (also known as “Personal Data”):** Personal Information means data about a particular individual or household that identifies, relates to, describes, could be reasonably linked with, or could be used to identify that person or household (or from those and other information either in our possession or likely to come into our possession). It also includes other information that may be associated with your Personal Information, such as your Usage Data (defined below), location, preferences or interests, if that information can be used to identify you or your household.

- **Services:** As noted above, our Services include the <http://www.calyachtclub.com> website operated by the CYC, our Club Dining services, On the Water activities, amenities, Activities & Committees, private event services, and an array of social, business, athletic events, and other hospitality services that you enjoy thanks to your CYC membership or reciprocal club membership.
- **Usage Data:** Usage Data is data collected automatically either generated by the use of the Website or from the Website infrastructure itself (for example, your IP address or the duration of a page visit).
- **Cookies:** Cookies are small files stored on your device (computer or mobile device).
- **Data Controller:** The natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be, processed. For the purpose of this Privacy Policy, we are a Data Controller of your Personal Information.
- **Data Processors:** Any natural or legal person who processes the data on behalf of the Data Controller. We may use the services of various Business facilitation partners in order to process your data more effectively.
- **User (or “Data Subject”):** Any individual who uses our Services and is the subject of Personal Information collected and/or processed.

II. Information Collection and Use

We use your information to provide the Services that you request, and to improve the Services we offer to you.

a. Types of Data Collected

We collect several different types of information for various purposes to provide and improve our Service to you.

- **Personal Information.** While using our Services, we may ask you to provide us with or otherwise obtain certain personally identifiable information that can be used to contact or identify you. Such Personal Information may include, but is not limited to your name, address, email address, driver’s license information, username, payment card information, Social Security number, family information (including spouse and children’s names for membership purposes), payment, bank account and/or direct billing information, credit report, proof of insurance related to mooring your boat or vessel with us, and any other information that may identify you.
- **Usage Data.** We may also collect information on how you access and use our Services (“Usage Data”). This Usage Data may include information such as your computer’s

Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Services that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

- **Generic Information.** Generic information is information that does not directly reveal the identity of a CYC member, customer, or visitor to the Website. This information may include Usage Data and other aggregate usage metrics such as total number of Website visitors, pages viewed, and usage patterns within the Website, etc. This may also include information about your device. We may automatically gather some Generic Information from our members, customers, and Website visitors. At times, the combination of various types of data, including Generic information and Usage Data, may enable you to be identified, and may therefore qualify as Personal Information.
- **Tracking & Cookies Data.** We use cookies and similar tracking technologies to track the activity on our Website, and we hold certain information. Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Other tracking technologies are also used such as beacons, tags and scripts to collect and track information and to improve and analyze our Services.

Some of the cookies we use are “strictly necessary” for the functionality of our Websites. Others improve the functionality of our Websites but are not strictly necessary. Some cookies help improve the performance of our Websites (such as by gathering analytic data), while others help provide targeted services to you (like ads that you may be interested in).

Examples of Cookies and other technologies we may use include:

- **Session Cookies.** We use Session cookies to operate our Website. Session cookies are temporary, and are automatically deleted once you close your Internet browser.
- **Preference Cookies.** We use Preference cookies to remember your preferences and various settings. Preference cookies are first party that cookies remain on your computer hard drive until you delete them or until they are otherwise removed upon expiration.
- **Third Party Cookies.** CYC permits third-party business facilitation partners, advertisers and other companies to use cookies or other similar technologies on our Website, such as DoubleClick, and Facebook Connect. These companies may collect your information, track your behavior on our Website, and gather information about your use of our Websites or Services and other online services over time and across different services. Additionally, some companies may use information collected to deliver targeted ads on behalf of us or other companies, including on other websites or online services. We are not responsible for the functioning of cookies and other technologies used and placed by third parties on your device.

- **Pixel tags.** Pixel tags and web beacons are tiny graphic images placed on website pages or in our emails that allow us to determine whether you have performed a specific action. When you access these pages or open or click an email, the pixel tags and web beacons generate a notice of that action. These tools allow us to measure response to our communications and improve our web pages.
- **Other Technologies.** We collect many different types of information from other technologies to improve the quality of our Website and the services we provide. For example, we may collect Usage Data and other information about the device you use to access our Website, your operating system and/or mobile device type, browser type, domain, and other system settings, as well as the language your system uses and the country and time zone where your device is located. We may record the IP address of the device you use to connect to the Internet.

Your Cookie Choices

When it comes to what cookies are on your devices, you are at the helm. You may set your browser to block or otherwise control what cookies your browser or mobile device accepts via your browser or mobile device settings. Additionally, you can choose to modify your settings and delete those cookies that are otherwise stored on your device at any time. Please consult the instructions provided by your browser or your mobile device's manufacturer to determine how you can limit the placement of and/or remove cookies or other technologies. Please note, however, that limiting or disabling the use of cookies and other technologies may impact or adversely affect your ability to perform certain transactions on, use certain functionalities of, and access certain content on our Website.

III. How We Collect Your Information

CYC collects and obtains your information in a few ways: there is information that you choose to give to us, information we obtain through your use of our Services – including our Website – and information we obtain from third parties.

a. Information You Give Us

We collect information that you decide to share with us. At times, we may require you to provide certain information – including Personal Information – in order to use certain parts of our Website, fulfill your requests with us, or provide you with certain Services. For instance, we may require you to provide your name, email address or other contact information when you contact us with a question or comment. If you establish a membership account with us, we may require you to create a username and password to access our Member Login portal at <http://www.calyachtclub.com>. Additionally, we may need you to provide certain Personal Information to sign up for a membership, reserve CYC space for a private event or party, take advantage of our reciprocal membership services, moor your vessel at CYC facilities, or book

certain or use other aspects of our Services. We may also ask for the size and name of your vessel under certain circumstances, including when mooring your vessel at our dock.

b. Information We Obtain When You Use Our Services

As noted above, we collect certain information from you through your use of our Services, such as Usage Data. For instance, in using our Website, we may collect information about the device you use to log into, access, and use the Website. We may collect other Generic Information in relation to how you use our Website or other Services (for example, aggregate metrics on how often certain pages on our Website are accessed and viewed).

We may collect information through the use of cookie, pixel tags, or other technologies, as described under above.

c. Information We Obtain from Third Parties

We may also obtain information about you from our third party business facilitation partners and other groups who help us provide our Services to you. For example, we may obtain your name and membership status with other Yacht club as part of our reciprocal club membership program. We may also need to verify your proof of insurance with third parties in relation to your request to moor your vessel at our docks and facilities.

We may also receive information about your credit history from third party credit bureaus. This information is used to determine how much credit to extend as part of your membership.

LAAC provides certain services for or on behalf of CYC, such as its IT systems. Additionally, LAAC members may enjoy access to and use of some of CYC's Services. Accordingly, we may gather information about LAAC members in relation to their use of our Services, such as to verify eligibility to use CYC's facilities and other Services.

IV. Purposes for Collecting, Processing, and Using Your Information

a. Business and Commercial Purposes for Collection

CYC collects, processes (or asks our business facilitation partners to process on our behalf), and uses your information to provide the Services we make available to you. We therefore will collect and use your information for a variety of reasons, including:

- To perform a contract with you, or provide Services related to your membership or other Services you have requested of CYC (for instance, we need to collect and process your information when you become a member of CYC, enjoy our dining facilities, participate in our Club Activities or On the Water activities, etc., in order to provide those services to you).

- You have otherwise given us your consent and permission to do so (for example, you apply for membership or seek to moor your vessel with CYC, we will ask that you provide Personal Information related to those requests).
- To facilitate providing our Websites and other Services that we offer to you. These operational purposes may include but are not limited to:
 - Operating, maintaining and improving of our Services, including the Websites;
 - Detecting security incidents;
 - Detect, prevent, and address technical issues; and
 - Protecting against and helping law enforcement to prosecute individuals responsible for malicious, deceptive, fraudulent, or illegal activity.
- The collection and processing is related to another CYC business or commercial purpose. For instance, we may use you information to assist with fraud prevention, improve the security of our networks, assist with enhancing the physical security of our guests, customers and members, and report suspected criminal activity to law enforcement. We may also use your information in relation to certain marketing events and promotions we think may be of interest to you.
- To comply with applicable laws, in response to a lawful and enforceable request by a law enforcement, judicial, or other public authority, or in connection with an applicable legal obligation.

b. Legal Bases for Processing and Using Your Information (EU data subjects)

Similar to the purposes for collecting your information, CYC processes the information of EU Data Subjects for the following reasons:

- Fulfilling a Contractual Obligation: the processing is necessary to perform a contract with you.
- Consent: you have otherwise given us your consent and permission to do so – for instance, if you provide us your email address to our newsletter, or willingly provided your information to us to provide feedback on or ask us questions about our Services.
- Legal Obligation: To comply with applicable laws, in response to a lawful and enforceable request by a law enforcement, judicial, or other public authority, or in connection with an applicable legal obligation.
- Legitimate Interest: The collection is in our legitimate interests or the legitimate interests of a third party, and is not outweighed by any applicable rights you may have. For instance, we may use you information to:

- Assist with fraud prevention.
- Improve the security of our networks.
- Operate, maintain and improve our Services, including the Websites.
- Prevent, detect, and address technical and security incidents.
- Report suspected criminal activity to law enforcement.
- To provide customer support to you and our other members, customers, and visitors.

V. How We Use Your Information

As noted elsewhere in this Privacy Policy, CYC uses your information to provide our Services to you, including our Website. For instance, we will use your information to facilitate your membership or guest experience with CYC, personalize your Website experience when you use our Website, and fulfilling other requests made by you or tasks related to your CYC experience. We may also reach out to you at your request through our pages on third party platforms like Facebook, Instagram, and LinkedIn.

Such other general uses include:

- To provide and maintain our Services.
- To notify you about changes to our Services.
- To allow you to participate in any interactive features of our Services when you choose to do so.
- To allow you to charge meals, drinks, services, and other amenities directly to your membership account.
- To pay your membership fees and other charges directly from your financial account.
- To assess your membership credit amount and limits.
- To provide customer support to you and our other members, customers, and visitors.
- To gather analysis or valuable information so that we can improve our Services.
- To monitor the usage of our Services.
- To detect, prevent and address technical issues.

- To provide you with news via our weekly newsletter, special offers, marketing or promotional materials, and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired, or which we believe may be of interest to you, unless you have opted not to receive such information. You may opt out of receiving any, or all, of these communications from us by contacting us at the contact information listed below. If you reside in the European Union or the European Economic Area (“EEA”), we will send you such communications with prior consent.
- Various aspects of the Website, such as content on the Website, and email messages we send you in connection with your use of the Website may include advertisements that may be selected for you based on your demographic information, interests, preferences, and usage patterns within the Website.

VI. How We Disclose or Share Your Information

CYC **does not** sell your information to any third party. However, CYC may disclose your information in a number of ways in order to provide our Services to you. For instance, we may share your information with our third party business facilitation partners that facilitate the functions of our Website, such as our web hosting and cloud storage providers. We may also share or disclose your information to those third party business facilitation partners that facilitate our membership, hotel, and restaurant services, and other amenities available to you, such as providing your credit card number to a third party payment processor when you make a reservation with us. We may also share your information with sailing organizations and reciprocal yacht club member organizations.

We may also provide your Personal Information to business facilitation partners or contractors to perform functions on our behalf including companies or individuals hired to publish and operate the Website, communicate news, deliver our promotional materials via e-mail and direct mail, promote our social media presence and activities, develop, enhance, market, or provide any of our products, and assist us with sending communications and performing other marketing and support functions.

We may also disclose or share your information for the following purposes:

- To comply with a legal obligation.
- To protect and defend CYC’s rights or property.
- To prevent or investigate possible wrongdoing in connection with the Services.
- To protect the personal safety of users of the Services or the public.
- To protect against legal liability.

- When there is a good faith belief that such action is necessary to investigate or protect against harmful activities to our guests, visitors, associates, or property (including the Website), or to others (including CYC itself). This may include disclosures to law enforcement to investigate potential criminal activity or other civil violations.

a. Categories of Third Parties that Receive Personal Information from CYC

We share or otherwise disclose individuals' personal information to the following categories of third parties:

- **Business facilitation partners:** We employ third party business facilitation partners, companies, individuals, and agents to facilitate and help us provide our Services to you. Such Business facilitation partners perform tasks or functions on our behalf, provide Services-related services, or assist us in analyzing how our Services are used or delivered. These third parties are granted access to your information only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose. For more information on the analytic Business facilitation partners we use to better understand how you and other visitors use our site, please go to the "Analytics" section below.
- **CYC Affiliated Vendors:** Some of the amenities that we offer to you at CYC are actually fulfilled or provided by CYC affiliated vendors. CYC may share your information with these vendors in order to provide the Services you requested or otherwise enhance your experience at CYC.
- **Other CYC/LAAC Entities:** As noted above, CYC members enjoy access to certain LAAC member services, benefits, and amenities as part of their CYC membership. LAAC also provides certain services for and/or on behalf of CYC. For example, LAAC provides IT and other administrative services for CYC. We may share or disclose your information to LAAC and other CYC entities as part of these relationships.
- **Yacht Clubs & Sailing Organizations:** CYC has reciprocal relationships with yacht clubs and racing organizations around the world, such as the Union of Southern California Yacht Clubs, the International Council of Yacht Clubs, the Yacht Racing Union, U.S. Sailing, and others. Through these relationships CYC members are allowed to use these clubs facilities simply by being a CYC member in good standing. Accordingly, we will share your membership information with such yacht clubs for verification or other purposes related to your association with or use of their services.
- **Collection Agencies:** Sometimes we may need to share individuals' information with collection agencies to help bring past-due accounts up-to-date.
- **Marketing:** CYC may provide your information to marketing firms like Constant Contact that help us in providing our email newsletters and other communications to you.

b. Categories of Personal Information Disclosed

CYC has disclosed the following categories of Personal Information in the last 12 months for a business or commercial purpose:

- Member names;
- Membership information;
- Payment card or other billing information;
- Social Security numbers (solely to facilitate bringing past-due accounts up-to-date);
- Driver's license; and
- Automobile and vessel liability insurance information.

c. Categories of Personal Information Sold

CYC does not sell individuals' information without their permission. CYC has not sold Personal Information to third parties in the past 12 months.

Please note that a "sale" of Personal Information does not include those instances when such information is part of a merger, acquisition, or other transaction involving all or part of our business. If we sell all or part of our business or make a sale or transfer of assets or are otherwise involved in a merger or other business transaction, we may transfer your Personal Information to a third party as part of that transaction. If such transaction materially affects the manner in which your Personal Information is processed, we will notify you of such change prior to its implementation.

VII. Retention of Data

CYC will retain your Personal Information for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Information to the extent necessary to provide our Services to you, comply with our legal obligations (for example, if we are required to retain your information in accordance with applicable laws), resolve disputes and enforce our legal agreements and policies.

We will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Services, or we are legally obligated to retain this data for longer periods.

VIII. Transfer of Data

Your information, including Personal Information, may be transferred to – and maintained on – computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction.

If you are located outside United States and choose to provide information to us, please note that your information, including Personal Information, will be transferred to and processed in the United States. If you are located in the European Union, you should be aware that U.S. data protection laws are not deemed to be as adequate as those in the European Union. Your consent to this Privacy Policy by your continued use of our Websites followed by your submission of such information represents your agreement to that transfer.

CYC will take steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Information will take place to an organization or a country unless there are adequate safeguards in place including the security of your information.

IX. Security of Data

The security of your data is important to us but remember that no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Information from loss, misuse, and unauthorized access, alteration, disclosure, and destruction, we cannot guarantee its absolute security. By using our Website and Services, you acknowledge that there are data security and privacy limitations inherent to the use of the Internet, and that the security, integrity, and privacy of any and all information exchanged between you and CYC, or between you and other related entities, cannot be guaranteed. We cannot ensure or warrant the security of any information you transmit to us or that we store, and you do so at your own risk.

X. Our Policy on “Do Not Track” Signals under the California Online Protection Act (CalOPPA)

We do not support Do Not Track (“DNT”). Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked. You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser. We do not track consumers’ online activities over time and across third-party Web sites or online services.

Third parties may collect data that relates to you. We cannot control third parties’ responses to do-not-track signals or other such mechanisms. Third parties’ use of data relating to you and responsiveness to do-not-track signals is governed by their respective privacy policies.

XI. Your Data Protection & Privacy Rights

California residents and data subjects in the EU / European Economic Area (“EEA”): CYC aims to take reasonable steps to allow you to correct, amend, delete or limit the use of your Personal Information, and exercise other rights available under applicable law. CYC therefore informs you that, where applicable under relevant law, you are entitled to the following:

- **Right to Access / Disclosure:** to have access to your Personal Information upon simple request – that is, you may receive a copy of such data upon receipt of a verifiable request, along with other information related to the processing.
- **Disclosure of Direct Marketers:** to have access upon simple request, and free of charge, the categories and names of addresses of third parties that have received Personal Information for direct marketing purposes. Please see the “Your California Privacy Rights” section below for more information.
- **Right to Information About Selling, Sharing, or Disclosing Personal Information:** upon receipt of a verifiable request, you may obtain a list of:
 - The categories of Personal Information collected about you, sold to third parties, or disclosed to third parties for business purposes;
 - The categories of Personal Information sold within the last 12 months;
 - The categories of sources from which Personal Information is collected;
 - The business or commercial purpose for collecting or selling Personal Information; and
 - The categories of third parties with whom Personal Information is shared, sold, or disclosed for a business purpose.
- **Right to Opt-Out of the Sale of Personal Information:** As noted elsewhere, CYC does not sell individuals’ Personal Information. California residents have the right to opt-out of the sale of their Personal Information under certain circumstances.
- **Right to Correction:** for EU data subjects, to correct your Personal Information if you find it is inaccurate, incomplete or obsolete.
- **Right to Deletion / “Right to be Forgotten”:** to obtain the deletion of your Personal Information in the situations set forth by applicable data protection law.
- **Withdraw of Consent to Processing:** for EU data subjects, to withdraw your consent to the data processing without affecting the lawfulness of processing, where your Personal Information has been collected and processed based on your consent and not any other basis.
- **Right to Object:** for EU data subjects, to object to the processing of your Personal Information under certain circumstances, in which case we may ask you to justify your request by explaining to us your particular situation.
- **Right to Restrict Processing:** for EU data subjects, to request limits to the processing of your data, when allowed by and in circumstances set forth under applicable law.
- **Right to Data Portability:** to have your Personal Information directly transferred by us to a third-party processor of your choice (where technically feasible; may be limited to situations when processing is based on your consent).

- **Right to Non-Discrimination.** As defined under relevant law, you have a right to non-discrimination in the Services or quality of Services you receive from us for exercising your rights.

Please contact us at the information in “Contact Us” Section below in relation to exercising these rights. Note that we may ask you to verify your identity before responding to such requests.

Additional Rights for EU Data Subjects

EU data subjects also have the right to complain to a Data Protection Authority (“DPA”) about our collection and use of your Personal Information. For more information, please contact your DPA. EU data subjects also have the right to object to automated decision-making that produces a legal effect on the data subject.

XII. Your California Privacy Rights

If you are a California resident, you have the right to request information from us regarding the manner in which we share certain categories of personal information with third parties for their direct marketing purposes, in addition to the rights set forth above.

Under California law, you have the right to send us a request at the designated address listed below to receive the following information:

1. the categories of information we disclosed to third parties for their direct marketing purposes during the immediately preceding calendar year;
2. the names and addresses of the third parties that received the information; and
3. if the nature of the third party’s business cannot be determined from their name, examples of the products or services marketed.

To make such a request, please provide sufficient information for us to determine if this applies to you, and attest to the fact that you are a California resident. Please also provide a current California address for our response. You may make this request in writing to us at the below address. Any such request must include “California Privacy Rights Request” in the first line of the description, and include your name, street address, city, state and ZIP code. Please note that we are only required to respond to one request per customer each year, and we are not required to respond to requests made by means other than through the address provided for this purpose below.

Note that responsive information may be provided in a standardized format that is not specific to you.

XIII. Analytics

We may use third-party partners to monitor and analyze the use of our Website. Such partners may collect information about how to use and interact with our Website. This information may qualify as Personal Information under certain circumstances.

XIV. Links to Other Sites

Our Privacy Policy is designed to advise you about how we collect, use, protect, and disclose the information that we collect and/or receive about you. However, our Website may contain links to other sites that are not operated by us. Please note that this Privacy Policy does not govern the practices of third parties, including our partners, third party partners, and/or advertisers, even when those services are branded as, or provided on behalf of, CYC. Information collected from you by others, such as third party websites that you access through links on the Website, are governed by those entities' privacy policies. If you click a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

XV. Children's Privacy

Our Website is intended for adult audiences, and is not meant to address anyone under the age of 18 ("Children"). As such, children under 18 may not use our Website. If you are under 18, do not attempt to register for or use our Website and do not provide us any Personal Information about yourself.

We do not knowingly collect Personal Information from anyone under the age of 18. If you are a parent or guardian and you are aware that your child has violated this Privacy Policy and provided us with Personal Information via our Website, please contact us. If we become aware that we have collected Personal Information from Children via the Website without verification of parental consent, we will take steps to remove that information from our servers.

XVI. Changes to This Privacy Policy

We may update our Privacy Policy from time to time. While we reserve the right to make changes to our Privacy Policy at any time and at our sole discretion, we will notify you of any changes by posting the new Privacy Policy on this page. We will let you know via email and/or a prominent notice on our Website prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

XVII. Submitting a Verifiable Request to CYC

As mentioned above, California residents and European data subjects have certain rights to access, correct, delete, or otherwise control the use, collection, and/or disclosure of their

information. CYC will respond to an individual's "verifiable request" to exercise his or her rights under such laws – that is, where CYC has received a request claiming to be from a particular person, and CYC has been able to verify that person is who they say they are. The need to verify a person's identity is critical to protecting your information, and ensuring that your information is not shared with anyone pretending to be you or someone who is not authorized to act on your behalf.

You may submit a verifiable request via our email address, mailing address, or toll-free number, listed in the "Contact Us" section below, or as otherwise provided on our Website. CYC will ask you to provide information about yourself so that we can verify your identity as part of this process. This information may include your name, your address, information related to your membership or account, and any other information deemed necessary by CYC to reasonably verify your identity, to ensure that your information is not shared with anyone impersonating you.

We may ask for additional information if we have difficulty confirming your identity. We will not share your information or honor other requests in those situations in which we are unable to confirm a request for your information is a "verifiable request."

Please note under California law that a consumer can appoint an "authorized agent" to make certain verifiable requests upon their behalf, such as the right to know what information we collect about the consumer or to request deletion of the consumer's information. Because the security, integrity, and privacy of your information is paramount, we will ask that you identify and provide permission in writing for such persons to act as your authorized agent and to exercise your applicable rights under California law in such situations. This may require us to contact you directly and alert you that an individual has claimed to be your agent and is attempting to access or delete your information. We will also independently verify your identity to ensure that an unauthorized person is not attempting to impersonate you and exercise your rights without authorization. We will not share your information or honor any other requests in those situations where you cannot or do not grant permission in writing for an identified authorized agent to act on your behalf, or where we cannot independently verify your identity.

XVIII. Contact Us

If you have any questions about this Privacy Policy, our practices, your Personal Information, or your rights and choices under applicable laws, please contact us:

CYC Privacy Request, Membership Department
431 W 7th St. Los Angeles, CA 90014

By email: CYC.PrivacyPolicy@calyachtclub.net

By phone [toll free]: 1-833-826-4621

By web form: please [click here](#) to submit your request.

To Complete a Rights Request (California Residents & EU Data Subjects)

As noted above, California residents and EU data subjects have certain rights in relation to their personal information. Such individuals can exercise their rights to their Personal Information by contacting us using the methods detailed above. Please note that we will only process valid rights requests as they apply to California residents and EU data subjects.

As part of your rights request, you will need to identify which rights request you wish to make:

- Disclose the categories of personal information about me that CYC has collected.
- Disclose the specific personal information about me that CYC has collected.
- Disclose the categories of personal information about me that CYC has shared with third parties; or
- Delete my personal information.

Additionally, you will need to provide the following information so that we can validate your identity:

- Your First, Middle and Last Name (include your name at the time of membership, reservation and stay with the LA Athletic Club, or other contact with us as well if different from current);
- Your full Date of Birth
- Last four digits of your Social Security number
- Your phone number.
- Your full home address and ZIP code.
- Your CYC membership number
- For reciprocal club members, your club name and membership information
- Your Email Address (include your Email Address at the time of membership, reservation and stay with the LA Athletic Club, or other contact with us as well if different from current email address)

The information we gather from your submission will only be used for validation purposes and will be deleted after your identity is verified. If we are unable to verify your identity, we will be unable to honor your requests.

Additionally, if you made a request for the specific pieces of information collected about you, or if you made a request to delete your information, we will need you to also separately provide a written declaration signed under penalty of perjury (such as a notarized declaration) that you are the person to whom the request relates. Please provide your written declaration to us at the postal address above.

XIX. Difficulty Accessing Our Privacy Policy?

Individuals with disabilities who are unable to usefully access our privacy policy online may contact us at the above-listed contact information to inquire how they can obtain a copy of our policy in another, more easily readable format.