

Privacy Policy

Last Modified Date: April 2, 2023

DeBordieu Club (“**DeBordieu Club**”, “**we**”, “**our**”, and “**us**”) is an exclusive coastal retreat located in Georgetown, South Carolina.. One of our main priorities is protecting the privacy of visitors to the Site and other individuals who provide information to us in connection with the Site or a membership (collectively, “**you**” and “**your**”).

We provide this privacy policy (“**Privacy Policy**”) to describe and explain our information collection practices regarding information collected through our website, <https://www.debordieuclub.com/>, and any other site, application, or service which references this Privacy Policy (the “**Site**”), or otherwise in relation to the a membership or application for a membership. This Privacy Policy applies to personal information that identifies, relates to, describes, is reasonably capable of being associated with a particular consumer or household, or as defined by applicable privacy laws (“**Personal Information**”) collected when you interact with the Site (or any affiliated third-party website that may contain a link to this Privacy Policy).

By accessing or using the Site or providing us with data in connection with a membership (the “**Services**”), you agree to the terms of this Privacy Policy and consent to our privacy practices described in this Privacy Policy, including our use and disclosure of your Personal Information as described below. If you do not agree with our policies and practices, including our use and disclosure of your Personal Information, please do not use the Site or Services and do not provide us with any Personal Information.

1. REVISIONS AND UPDATES

From time to time, we may change this Privacy Policy to reflect changes to our privacy practices. We encourage you to periodically review our Privacy Policy for the latest information on our privacy practices. We will notify you of any changes to this Privacy Policy by posting the revised or updated Privacy Policy and its “Last Modified” date on the Site. If the revision or modification is material, we will provide you notification via email. Your continued use of the Site after the “Last Modified” date constitutes your acceptance of and agreement to the Privacy Policy and its revisions or updates.

2. COLLECTION OF INFORMATION

During your use of the Site, DeBordieu Club collects Personal Information, in various ways, including:

- Directly from you when you provide it to us;
- Automatically as you use the Site; and
- From third parties.

a. Information Provided by You

We may collect Personal Information and other information directly from you when you use the Site, such as when you subscribe to our email list, complete the intake form, pay for your Arts Engagement, or contact us. We may collect the following types of Personal Information based on your interactions with the Site:

- Email List Subscription, including email;

- Contact information, including name, email address, telephone number, and any information you provide in the “Comments/Questions” field;
- Membership Application Information, including name and birthdate, spouse’s name and birthdate, address, phone number, email, spouse’s phone number and email, children’s names and birthdates, educational information, employment information, club member sponsor information, and contact information for references
- Payment Information, including financial and bank information; and

b. Information Automatically Collected

Like many other websites, DeBordieu Club and its service providers may collect and store information that is generated automatically as you navigate through the Site. This information is primarily needed to maintain the security and operation of the Site, and for our internal analytics so that we can improve the Site; however, we may also use this information for marketing purposes. We may use the following technologies to collect certain types of information:

- Internet and Electronic Activity, including internet protocol (IP) addresses, browser type, Internet Service Provider (ISP), date and time stamp, referring/exit pages, and possibly the number of clicks.
- Cookies. Like any other website, DeBordieu Club uses ‘cookies’ on the Site. These cookies are used to store information including visitors’ preferences, and the pages on the Site that the visitor accessed or visited. The information is used to optimize the users’ experience by customizing our web page content based on visitors’ browser type and/or other information. You can configure your browser to accept cookies, reject cookies or notify you when a cookie is being used; however, if you do so it may render your computer unable to take advantage of certain personalized features of the Site. For more information on how to opt-out of cookies, please visit the [Choices](#) section below.
- Third Party Cookies
 - **Google Analytics**. We use various analytics services to better understand how visitors interact with the Site. These analytics services provide information including but not limited to information on where visitors came from, what actions they took on the Site and where visitors went when they left the Site. For example, we use Google Analytics to help us perform our business and service-related analytics. For more information about how Google Analytics uses your data, please see: www.google.com/policies/privacy/partners, as well as its privacy policy: <http://www.google.com/policies/privacy>. You may opt out of the use of Google Analytics by visiting the Google Analytics opt-out web page at: <http://tools.google.com/dlpage/gaoptout>.

c. Information from Third Parties

In addition to collecting some Personal Information directly from you, we may collect Personal Information from third parties including our business partners. You agree that the third-party providers of information, not DeBordieu Club, are responsible for maintaining your information with proper and sufficient accuracy and authority in accordance with all governing laws and regulations. We make no effort to verify any information for any purpose, including accuracy, legality, or non-infringement that we properly receive from third parties.

We may also receive information about you from social media platforms when you interact with us on those platforms or access our content through social media. Please note that the information we may receive from those third parties (such as Facebook, Instagram, LinkedIn, etc.) is governed by the privacy settings, policies

and/or procedures of the applicable platform, and we strongly encourage you to review them before submitting any information using a social media platform.

3. USE OF PERSONAL INFORMATION

We will use the Personal Information you provide to us for a variety of purposes, including to:

- create and administer the Site;
- process your membership application or provide other membership services;
- contact you for support and feedback requests;
- contact you to inform you of important changes or additions to the Site;
- send you administrative notices, offers and any other communications that we believe may be of interest to you;
- operate, improve and maintain the Site;
- track and monitor web traffic;
- analyze trends and transactions;
- support our internal and external business operations, including marketing and advertising;
- fulfill any other purpose for which you provide it;
- fulfill any legal or regulatory requirements and any of our internal policies;
- fulfill other purposes disclosed at the time of collection;
- enforce separate agreements between you and us and this Privacy Policy;
- for any other purpose with your consent; and
- as otherwise set forth in this Privacy Policy.

4. DISCLOSURE OF PERSONAL INFORMATION

We do not sell, share, rent, or otherwise disclose your Personal Information to any third parties, for monetary or other valuable consideration, except as described below:

- With Your Consent. We may share information when you provide us with your consent to do so. This may occur, for example, when you affirmatively instruct us to do so or it may occur through your use of the Site as provided in this Privacy Policy.
- Parent Companies, Subsidiaries, & Affiliates. We may disclose Personal Information about you to our parent companies, subsidiaries, and affiliates.
- Service Providers and Contractors. We may disclose to service providers, contractors, or other third parties any or all of the information that we collect about you to conduct business on our behalf. These activities could include processing or making payments, maintaining the Site, or facilitating email delivery to you. Our service providers and contractors are contractually obligated to protect your Personal Information, including to keep your information confidential and to use it only for the purposes for which we disclose it to them.
- Business Partners. We may share your Personal Information with our business partners (i.e. Lyft) to provide you with a product or service (i.e. transportation to Arts Engagement) you may have requested. We may also share your Personal Information to business partners with whom we jointly offer the any products, services, therapies, or content.
- Advertising Partners. We may share your Personal Information with third party advertising partners, such as Google Display Advertising and Remarketing services and Facebook. These advertising partners may use

first- and third-party cookies together to inform, optimize, and serve ads based on your past visits to the Site. You can opt out of these services using the Ads Preferences Manager or you can use the Google Analytics opt-out browser add-on. These advertising partners may use this information (and similar information collected from other services) for purposes of delivering personalized advertisements to you when you visit digital properties within their networks, commonly referred to as “interest-based advertising.”

- **In the Event of Merger, Sale, Divestitures, or Change of Control.** If we go through a business transfer, such as consolidation, merger, restructuring, acquisition, reorganization, dissolution, or sale of part or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, you acknowledge and consent to the transfer or assign of your information. You further acknowledge and consent to the continued use of your information by the recipient so long as they comply with this Privacy Policy.
- **Other Disclosures.** We may disclose your Personal Information when we have a good faith belief that disclosure is helpful or reasonably necessary to: (i) comply with any court order, law, or legal process, including responding to any government, law enforcement, or regulatory request; (ii) enforce or apply our terms of use, other agreements, including between you and us, and any other documents included or referenced therein (all of which are incorporated into and made a part of this Privacy Policy by this reference); (iii) fulfill the purpose for which you provide it; (iv) detect, prevent, or otherwise address fraud or security issues; or (v) protect against harm to our, your, or third parties’ rights, property, or safety.

a. Sharing of Non-Personal Information and Aggregate Data

We may share de-identified and/or aggregate analytics with third-party partners about how you interact with the Site, including usage patterns for certain programs, content, services, advertisements, promotions, and/or functionality available through the Site.

5. CHOICES

You have choices about how we use your Personal Information. Please understand that if you choose not to disclose information to us, it may affect your ability to use some features and functionalities of the Site.

a. Cookies

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 the Site may then be inaccessible or not function properly.

b. Marketing

If you no longer wish to receive marketing or informational emails, you may choose not to by contacting us as specified in the [Contact Information](#) section below or by clicking on the “unsubscribe” link located at the bottom of marketing emails you may receive from us. Regardless of your choices regarding promotional communications and updates regarding content, we may send you administrative messages, service announcements, or other similar communications, without offering you the opportunity to opt out of receiving them.

c. Advertising

Advertisements appearing on the Site may be delivered by advertising partners, who may set cookies. These cookies allow the ad server to recognize your computer each time they send you an online advertisement to compile information about you or others who use your computer. This information allows ad networks to, among other things, deliver targeted advertisements that they believe will be of most interest to you. This Privacy Policy covers the use of cookies by us and does not cover the use of cookies by any advertisers.

We and our service providers may use information about your interactions with the Site to predict your interests and select the ads you see on and off the Site. This is known as interest-based advertising. We may also 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. In providing interest-based ads, we follow the Self-Regulatory Principles for Online Behavioral Advertising developed by the Digital Advertising Alliance ("**DAA**"). 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.

For more information about interest-based advertising and how you can opt out, visit:

- Digital Advertising Alliance: <http://www.aboutads.info/choices>
- Network Advertising Initiative: <http://www.networkadvertising.org/choices/>

d. Do-Not-Track

Many web browsers include a Do Not Track ("**DNT**") feature or setting that signals your preference not to have information about your online browsing activities monitored and collected. However, there is currently no uniform standard for recognizing and implementing the DNT signals. As such, DeBordieu Club does not monitor or respond to DNT browser requests. If a standard is adopted that we must follow in the future, then we will inform you about that practice in a revised version of this Privacy Policy.

6. CONFIDENTIALITY & SECURITY

We have implemented reasonable measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration, and disclosure. Unfortunately, the transmission of information via the internet is not completely secure and can potentially be intercepted or incorrectly routed. Although we do our best to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted to the Site. Any transmission of Personal Information is at your own risk.

7. THIRD PARTY WEBSITE

The Site may contain links to third-party websites, services, products, mobile applications and/or contain advertisements from third parties that are not affiliated with us – and which may link to other websites, services, or applications. We are not responsible for the privacy policies or other practices employed by other websites or third parties, including those using the DeBordieu Club or our affiliates and subsidiaries branding. We encourage you to review the privacy policies and practices of such third parties prior to using their websites, services, or application. We do not make any guarantee regarding those third-party websites, services, or applications, and we are not liable for any loss or damage caused by the use of such websites, services, or applications.

8. INFORMATION RETENTION

We may retain certain information as required by law or for necessary business purposes. We are under no obligation to store such Personal Information indefinitely and, to the extent permitted by law, disclaim any liability arising out of, or related to, the destruction of such Personal Information. In addition, you should be aware that it is not always possible to completely remove or delete all of your information from our databases without some

residual data because of backups and other reasons. We are under no obligation to destroy anonymized aggregate data.

9. CHILDREN

The Site is not intended for children under the age of 13. We encourage parents and guardians to observe, participate in, and/or monitor and guide their online activity. DeBordieu Club does not knowingly collect nor maintain any Personal Information from children under the age of 13. If you think that your child provided this kind of information without guardian or parental consent, we will take all reasonable measures to remove or delete such information as soon as practicable and not use such information for any purpose, except where necessary to protect the safety of the child or others or as required or allowed by law. If you believe a child under age 13 has provided us with Personal Information, please contact us as specified in the [Contact Information](#) section below.

10. INTERNATIONAL VISITORS

The Site is intended for visitors located within the United States. We may use service providers that operate in other countries, thus, your Personal Information may be processed in the United States or transferred to other locations where privacy laws may not be as protective as those in your state, province, or country. If you do not reside in the United States and provide Personal Information to us, please note that your Personal Information will be transferred, processed, collected, used, accessed and/or stored in the United States and subject to U.S. laws. The laws in the United States may not provide the same protections for your Personal Information as the jurisdiction in which you are located. Do not provide your Personal Information to us if you do not want this information to be transferred or processed outside of your country, or if the laws in your country restrict such transfers.

11. CONTACT INFORMATION

If you have questions, comments, or concerns regarding this Privacy Policy or DeBordieu Club' privacy practices, please contact us through email at guestservices@debordieuclub.com or call us at 843-527-6020.