

Privacy Policy

Date of Compilation: 2026/01/20

Date of Revision: 2026/09/11

1. Introduction

Fairway Footprint (Pty) Ltd with registration number 2026/014913/07 ("Fairway Footprint", "we", "us", or "our") operates the Fairway Footprint mobile application (the "App"). We are committed to protecting your privacy and handling your personal information in an open and transparent manner. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you use our App.

Fairway Footprint acknowledges and supports consumer rights and the right to privacy. Accordingly, our users' privacy and trust are extremely important, and we will ensure that personal information ("information") is collected and handled in a transparent and lawful manner in alignment with the Protection of Personal Information Act 4 of 2013 ("POPIA").

By downloading, accessing, or using the App, you acknowledge that you have read and understood this policy and consent to the processing of your personal information as described herein. If you do not agree with our policies and practices, please do not use the App.

1.1 Purpose

This policy outlines how Fairway Footprint collects, uses, stores, and protects the personal information of users of the App. Its purpose is to:

- Inform you about the types of personal information we collect and why.
- Explain how we use and share your information.
- Detail your rights regarding your personal information under applicable law, particularly POPIA.
- Demonstrate our commitment to lawful, reasonable, and transparent data processing.

1.2 Scope

This policy applies to all users of the Fairway Footprint App, including visitors, registered users, and any persons whose information is processed by us in the course of providing our services. It governs the processing of all personal information collected through the App or in connection with its services.

1.3 Legislation and Regulations

This policy is subject to the laws of the Republic of South Africa in particular POPIA and the Consumer Protection Act, 2008 ("CPA") as well as other relevant data protection legislation. Any dispute arising will, to the extent permitted by law, first attempted to be settled internally and if this is not possible be referred to arbitration in Pretoria at a venue to be determined by us applying the Uniform Rules of the High Court of South Africa. Page 4 of 8 In the interests of compliance with the Promotion of Access to Information Act, 2000, Fairway Footprint offers you the opportunity to view our PAIA manual on our website: www.fairwayfootprint.com/paia

1.4 Roles and Responsibilities

Based on POPIA, the following role players are relevant to this policy:

Role	Responsibilities
Information Regulator	The Information Regulator Office duties include providing education, monitor and enforce compliance, handle complaints and facilitate cross-b order cooperation in the enforcement of privacy laws. In the context of this policy this is the office of individuals appointed by the President of South Africa in terms of POPIA.
Information Officer	The individual who is the Information Officer of Fairway Footprint who is registered with the Information Regulator in terms of the PAIA and POPIA and is responsible for ensuring that Fairway Footprint comply with the Acts, or any person delegated by such designated officer of Fairway Footprint.
Data Subject	Any natural or juristic person who's identifiable by means of an identifier such as a name, an ID number, location data, or via factors specific to the person's physical, physiological, genetic, mental, economic, cultural or social identity. In the context of this policy this is the person (aka customer or user) whose information is being processed by Fairway Footprint.
Responsible Party	The party who determines the purpose of and means for processing personal information and is also responsible for protecting (safeguarding) the information of the data subject. In the context of this policy, the responsible party is Fairway Footprint.
Operator or Processing Party	The party who processes (collect, receive, record, collate, store, anonymise, retrieve, alter, use, distribute, erase, or delete) information for a responsible party in terms of a contractual agreement or mandate on behalf of a Responsible Party. In the context of this policy, the operator or processing party is Fairway Footprint.

2. Information We Collect

We collect only the minimum personal information necessary to provide the App's core functionality.

2.1 Account Information

When you register or log in using Google or Apple, we collect:

- Your first and last name.
- Your email address.
- A unique user identifier from your login provider.

We do not collect or store your passwords. This information is used solely to create, manage, and secure your account.

2.2 Display Name and Profile Visibility

You have full control over how your identity appears within the App:

- By default, your profile is private.
- You may choose a public display name. This defaults to your first and last name from your login provider but can be changed at any time in the App settings to any name of your choosing (including an anonymous pseudonym).

- Your chosen display name (or your first and last name if no display name is set) will be visible to other users only if you explicitly opt-in to public features such as Friends or Leaderboards.

2.3 Golf Activity Data

To provide the core service of tracking and visualising your golf history, we collect:

- Courses played.
- Rounds recorded.
- Scores and round-related details.
- Journey and map visualisation data.
- When you use Round Tracker: timestamped GPS positions, route, distance, elapsed time, and recorded shot locations; step counts when you grant motion access.

2.4 Technical and Diagnostics Data

We may collect limited, anonymised data related to App performance, such as crash reports and interaction logs. This is used solely to improve stability and user experience.

2.5 Location Information

With your permission, we use your location to suggest nearby golf courses. When you start an active Round Tracker session, we record precise, timestamped GPS positions to map your route, calculate distance, and create your round history and Footsteps replay.

During an active session, location recording can continue while the screen is locked or the App is in the background, subject to your device permissions. Ending the tracking session stops its location recording. You can also withdraw location permission in your device settings. Background location access is used for active round tracking, not to monitor you outside a tracking session.

Tracking data is stored on your device and is included in saved round and Footsteps data when you use the corresponding save and sync features. Denying location access prevents GPS tracking but does not prevent you from recording a round manually.

2.6 Photos, Videos and Footsteps

You choose photos and videos using your device's system picker. The App receives only the items you select; it does not scan your photo library. For Footsteps, we read capture times from selected files to match them to your recorded round. Selected media is copied into App storage for preview and editing; your original library items are not changed or deleted.

When you save Footsteps, selected images become round photos and selected video clips are backed up with your round, together with the replay settings and recorded track. Full selected clips may contain sound and embedded metadata. Review your selection before saving. Choosing media alone does not publish it to other users; visibility and sharing follow the relevant round and social settings.

Camera access is requested when you choose a camera feature, such as photographing a scorecard or scanning a society code. Saving a generated image or video to Photos is a separate action and requests add-only access on iOS. You can use a GPS-only Footsteps replay without selecting photos or videos. Saved media is retained with your round and account data under section 7 below.

3. Purpose and Use of Information

We use your information strictly for the following purposes:

- To provide, operate, and maintain the App and your account.
- To link your golf rounds and activity data to your profile.
- To enable opt-in social features.
- For internal analytics and diagnostics.
- For security, fraud prevention, and support requests.
- To comply with legal obligations.

We do not use your personal information for third-party advertising or marketing purposes.

4. Public Features and User Control (Opt-In)

All social and public-facing features are disabled by default. You must explicitly opt-in to activate them.

- If you opt-in, other users may see your display name (or your first and last name if no display name is set) alongside your ranking or scores.
- Other users can search for you by your first name, last name, display name, or email address. However, your profile will only appear in search results if you have enabled the relevant setting allowing yourself to be found. You remain in full control of this visibility in your App settings.

You can change these preferences at any time, instantly updating your visibility within the App.

5. Sharing and Disclosure of Information

We do not share your personal information, scores, ratings, or activity data with golf courses, advertisers, or any other third parties for their independent marketing or commercial purposes.

We may share limited data with trusted service providers (e.g., cloud hosting, authentication, analytics) who assist us in operating the App. These providers are contractually bound to process data only on our instructions and for the purposes stated in this policy.

We may disclose information if required by law, legal process, or to protect the rights, property, or safety of Fairway Footprint, our users, or others.

6. Data Security

We implement reasonable technical and organisational measures to protect your information, including encryption in transit, secure cloud infrastructure, and restricted system access. While no electronic transmission or storage system is 100% (hundred percent) secure, we strive to use commercially acceptable means to protect your data.

7. Data Retention and Account Deletion

We retain your personal information only as long as your account is active or as needed to provide the App and fulfil legal obligations.

You may delete your account at any time directly within the App using the account deletion feature. Upon deletion:

- Your personal data is permanently removed from our active systems without undue delay.
- Some encrypted backups may persist for a short period but are automatically overwritten and inaccessible for normal use.

8. Your Rights Under POPIA

In terms of POPIA, you have the right to:

- Access the personal information we hold about you.
- Request correction of inaccurate or incomplete data.
- Request deletion of your personal data (subject to legal limits).
- Object to the processing of your personal information.
- Withdraw consent, where processing is based on consent.

To exercise these rights, please contact our Information Officer using the details in clause 10.1.

9. Amendment of this Privacy Policy

We may amend this policy from time to time for any of the following reasons:

- to provide for the introduction of new systems, methods of operation, services, products, property offerings or facilities;
- to comply with changes to any legal or regulatory requirement;
- to ensure that this policy is clearer and more favourable to you;
- to rectify any mistake that may be discovered from time to time; and/or
- for any other reason which Fairway Footprint, in its sole discretion, may deem reasonable or necessary.

Any such amendment will come into effect and become part of any agreement you have with Fairway Footprint by publication of the amended policy on our website. It is your responsibility to check the website often.

10. Contact Us

10.1. Fairway Footprint Information Officer

If you have questions about this privacy policy or wish to exercise your rights in terms of access to, correction, or deletion of your information, please contact our Information Officer so that we can attempt to resolve your query.

Designated Information Officer:	Rudolf Marthinus Lombard
Telephone:	+27 82 847 6681
Email:	rm@fairwayfootprint.com
Physical Address:	14 Estelle Street, The Reeds, Centurion, Gauteng, South Africa, 0185
Website:	www.fairwayfootprint.com

10.2. Information Regulator (South Africa)

Physical Address:	JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001
Postal Address:	Private Bag 2700, Houghton, 2041
Tel:	+27 10 023 5200
Fax:	+27 11 484 7146
Website:	www.inforegulator.org.za
PAIA Complaints email:	PAIAComplaints@inforegulator.org.za
POPIA Complaints email:	POPIAComplaints@inforegulator.org.za
General enquiries email:	Enquiries@inforegulator.org.za