



THE DUNES CLUB  
P. O. Box 749  
137 Boston Neck Road  
Narragansett, RI 02882

## **Privacy Policy**

At The Dunes Club, we are dedicated to protecting and respecting our members' and guests' privacy, and safeguarding their Personally Identifiable Information (PII). We are also committed to adhering to the principles of applicable data protection and privacy laws and maintaining the confidentiality of information that our members and guests provide to us. Furthermore, we are committed to collecting, using, and disclosing personal information in a responsible manner and only to the extent necessary for the services we provide. This Privacy Policy has been created to confirm such a commitment to assist our patrons in understanding the type of personal information that we may collect from them, how we may use that information, to whom we may disclose it, and how we safeguard this information.

## **Information We Collect**

The types of personal information that we may collect includes your name; home; work; email addresses; telephone and fax numbers; date of birth; lifestyle information; such as leisure activities; names and ages of children; and other information necessary to fulfill special requests (e.g. health conditions that require focused attention). We may collect and process the following information: information that you provide by completing forms on our site, submitting job applications, or responding to communications from us. If you contact us, we may keep a record of that correspondence, along with details of your visit(s) to our site, including, but not limited to traffic data, location data, web logs, and other communication data resources that you access. We may also collect non-identifying information about you such as your use of our websites, communications conferences, aggregated data relative to your website visit or stay, and responses to promotional offers.

You have the right to choose which communications you wish to receive from us, and whether you provide us with your Personally Identifiable Information (PII). However, failure to provide such information may sometimes affect our ability to conduct certain transactions.

## **Who We Share It With**

In general, we provide access to your personal information only to employees and contractors we believe need that access in order to do their jobs and to provide products or services to you.

The Dunes Club will not sell, rent, or lease your Personally Identifiable Information (PII) to others. Unless we have your permission, or are required by law, we will only share the personal data you provide online with other member entities and/or business partners who are acting on our behalf

to complete the activities described above. Such member entities and/or business partners, including those located in other countries, are governed by our privacy policies with respect to the use of the data.

### **Disclosure of Information to Third Parties**

We do not sell or give physical possession of your Personally Identifiable Information (PII) to unaffiliated third parties. Situations in which we may disclose your information to others include: where we have received your consent to do so; in situations where sharing or disclosing your information is required in order to offer you products or services you desire; when access to your information is necessary to facilitate business operations; to meet contractual obligations to comply with legal or regulatory requirements or obligations in accordance with applicable law or a court order; where disclosure is required in order to enforce; to protect the rights, property or safety of our members, guests, or others; or in the case of emergency such as to safeguard the life, health, or property of an individual.

Where information is shared, we will limit the scope of information furnished to that which is necessary to perform the specific function. Unless otherwise precluded by the legal process, we require all third parties to protect your Personally Identifiable Information (PII) and abide by all applicable privacy laws and regulations.

### **Information Security**

Your information is stored on servers that are protected against unauthorized access through the use of safeguards such as “firewalls” and encryption. Any payment transactions will be encrypted. We take all reasonable precautions to safeguard your personal information, whether the information is kept electronically or otherwise. This involves ensuring that the only persons who view your personal information are those who reasonably have the need to do so to ensure that, where necessary and appropriate, sensitive personal information may be locked in filing cabinets or offices. Our staff is trained to collect, use, disclose personal information only as necessary to serve our customers’ needs, and in accordance with our Privacy Policy. Our computer network and all of our computers may only be accessed with passwords. We may occasionally use agents, contractors, or companies to perform services on our behalf (e.g. credit card companies, accountants, etc.). However, such parties will have limited access to personal information.

The data that we collect from you may be transferred to and stored in our databases. In the course of processing your information, it may also be necessary to transfer your Personally Identifiable Information (PII) to our affiliates, properties within The Dunes Club system, and third party service providers for the purposes outlined within the Privacy Statement. By submitting your personal data, you agree to this transfer. If you have been assigned a password to access certain parts of our site, you are personally responsible for keeping this password confidential.

### **Retention of Information**

We are required to maintain certain personal information for a period of time for various reasons. However, we maintain personal information only as long as it is required for the reasons it was collected. All personal information will be disposed of when appropriate, and in a manner that is secure and respects your privacy. When we dispose of a member or customers information, if applicable, our paper files are shredded, and information kept electronically is deleted from our computers and computer networks.

## **Use of Our Website**

You can visit most pages on our website without giving us any personal information. However, sometimes we do need personal information to provide services that you request. We only collect personal information that you submit voluntarily. By providing us with such information, you consent to our collection and use of your personal information for such purposes. Due to the nature of the internet., however, no data transmission over the internet is fully secure. Please be aware of this before you send us any information through our website as we cannot guarantee that information you transmit to us will not be intercepted and/or misused by third parties.

## **Links to Other Websites**

Occasionally, our website may contain links to other websites that may collect your personal information. We do not assume any responsibility for their privacy practices or policies and cannot be held liable for the actions of those third parties. You should review the privacy policies of such parties before providing them with any personal information.

## **Your Rights**

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you before collecting your data if we intend to use your data for such purposes, or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we may use to collect your data. We do not collect information from minors. We are, however, unable to determine the age of persons accessing and using our websites. When a minor provides us with his or her data without parental or guardian consent, we encourage the parent or guardian to contact us immediately, whereupon we will arrange for the prompt removal of the minor's information and unsubscribe the minor from further marketing communications.

## **Changes to Our Privacy Policy**

We reserve the right to amend the Privacy Policy at any time. Any amendment to the Privacy Policy will apply to the personal information collected, used or disclosed from and after the date of such an amendment. Additionally, we may amend this Privacy Policy from time to time in order to meet changes in the regulatory environment, business needs, or to satisfy the needs of our members and guests.

## **Contact Us**

Should you have any comments, questions, or concerns regarding our Privacy Policy, please feel free to contact us at:

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