

# Privacy Policy

City Racing (“CR”) Limited are committed to protecting and respecting your privacy. This policy notice aims to give you information on how and what CR collects, shares, uses, and protects your personal information when you visit our website including any data you may provide through by filling the forms on our website. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy applies to CR’s site and all products and services offered by CR and by entering our site you are agreeing to the policies described herein.

This privacy notice supplements the other notices and is not intended to override them.

## Who we are

For the purpose of the General Data Protection Regulation, the data controller is City Racing Limited, 22 Upper Brook Street, London, W1K 7PZ | Email: [info@cityracing.com](mailto:info@cityracing.com).

References in this privacy notice to “we” or “us” are references to the controller.

## Personal data process

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

1. Information you give us: This is information about you that you give us by filling in forms on, our site [cityracing.com](http://cityracing.com) or by corresponding with us by phone, e-mail or otherwise and when you report a problem with our site. The information you give us may include:
  - Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
  - Contact Data includes billing address, work or home address, email address and telephone numbers; information provided to us for the purposes of attending meetings, seminars and events.
  - Financial Data includes background information provided by you or collected as part of our on-boarding process; financial information e.g. payment details.
2. Information we collect about you: With regard to each of your visits to our site we may automatically collect the following information:
  - Technical Data includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website. However, this is statistical data about our users’ browsing actions and patterns, and does not identify any individual.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, political opinions, trade union membership, information about your health and genetic and biometric data).

### **How is your personal data collected?**

We collect this information when you interact with us, you may give us your Identity, Contact and Financial Data by filling in forms or for example when you communicate with our staff, when you provide us with your contact details, sign up to receive information by e-mail, or participate at a meeting, seminar or other event. We also collect or generate personal data in the course of providing our services, and we may collect personal data from public and private sources for example to keep your information up to date.

Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.

### **How we use your data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; and
- where we need to comply with a legal or regulatory obligation.

Examples of the purposes for which we may process your Personal Data include:

- to communicate with you;
- carrying out mandatory and regulatory checks, including but not limited to anti-money laundering checks;
- notifying you about changes to our service or terms or privacy policy;
- to promote our services, including by sending alerts, updates, event invitations etc.;
- to comply with our legal, regulatory and risk management obligations, including establishing, exercising or defending legal claims;
- to ensure that content from our site is presented in the most effective manner for you and for your computer; and
- to administer and protect our business and keep this website secure (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).

### **Cookies and use of our website**

Our websites may use tools such as Google Analytics, a service provided by Google, Inc. that tracks and reports on the manner in which our websites are used. Google Analytics does this by placing small text files called “cookies” on your computer or other device. Cookies collect information about the number of visitors to the websites, the pages visited, and the time spent on the websites.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

## **Emails**

We may use your name and e-mail address(es) obtained from you to send you alerts, updates, event invitations and other information by e-mail. If you wish to receive marketing communications from us you have to subscribe by e-mail. If you no longer wish to do so, you may unsubscribe at any time by following the link included in these e-mails.

## **We may share your personal information with third party organisations**

We may disclose your information:

- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- if City Racing Limited substantially or all of its assets are acquired by a third party, in which case personal data held by us will be one of the transferred assets;
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of City Racing Limited, our customers, or others;
- in the event that we need to contact credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you;
- if required by professional advisers including lawyers, bankers, auditors and insurers some based UK and some based outside EEA, who provide consultancy, banking, legal, insurance and accounting services; necessary to the performance of our contractual obligations to you;
- if we are under a duty to HM Revenue & Customs, Fraud prevention agencies, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances;
- if we engage with companies we have a joint venture or agreement to co-operate with; and
- or where required by companies you ask us to share your data with.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and our Cookie Policy; and that those we share data with adhere to similar exacting standards.

## **Transfer of personal data outside of the EEA**

Although we are a business based in the UK, due to the international nature of CR's operations and for the purposes of providing the services to you, any personal information that we hold and the data we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (EEA). By submitting your Personal Data, you agree to this transfer, storing and processing by us. We will take all steps reasonably necessary to ensure that such transfers comply with the Data Protection Laws and your data is treated securely and in accordance with this Privacy Policy and our Cookie Policy. This may include entering into data transfer agreements with recipients.

## **Data about third parties**

If, and to the extent, you provide Personal Data relating to any third party to us, you confirm that they have appointed you to act on their behalf, you have obtained their consent to pass their personal data to us and for us to process that Personal Data in the manner and for the purposes described in this Privacy Policy.

## **How we retain your data**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements but we may retain information after the closure of the relevant file for as long as permitted and or required for legal, regulatory, fraud and other financial crime prevention and for legitimate business purposes. In addition, we are required by law to retain certain types of information for specified time periods.

## **Your rights**

Under the UK Data Protection law, you have rights as an individual which you can exercise in relation to the information we hold about you. You are entitled to ask for details of the personal data we hold about you and how we process it and to receive a copy of your personal data. You may also have your data rectified or deleted, restrict our processing of that information, and object to the processing of your personal data. You may also choose to withdraw your consent. You can read more about these rights here – <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

You can contact us to discuss your information at any point in time using the details provided below the "Contact" section.

However, processing activities based on your consent in the past will not become unlawful as a result of your withdrawal. Please note that even after you have chosen to withdraw your consent we may be able to continue to process your personal information to the extent required or permitted by law or where there is a legitimate business interest to not do so.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these

websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

### **No fee usually required**

Any access request may be subject to a fee of £10 to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable additional fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### **Changes to our privacy policy**

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.

### **Contact**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to:

City Racing Limited

Address: 22 Upper Brook Street, London, W1K 7PZ

Email: [info@cityracing.com](mailto:info@cityracing.com)

Updated February 2019