



GDPR / Data Policy & Procedure

Revision 5 January 2021

Introduction

Standard Scuderia Ferrari Club S.c.ar.l Privacy and data protection policy

<https://www.scuderiaferrari.club/en/privacy-notice/>

By completing Member Registration you are joining your local “Scuderia Ferrari Club”, an official member and sub licensee of the Scuderia Ferrari Club S.c.ar.l., and will benefit from the privileges and services that come with membership. You are invited to read the following privacy policy, which outlines the purposes and means used for protection of your personal information in compliance with Regulation (EU) 2016/679.

Purpose and procedure for the processing of personal data

The personal data you have provided (“Data”) will be processed for the following purposes:

- a) providing the requested service (“Service”) according to the agreement between you and Scuderia Ferrari Club S.c.ar.l. (“Company”);
- b) allowing the Company to perform surveys on customers satisfaction (“Customer Satisfaction”) related to the quality of Company goods and services according to the Company legitimate interest;
- c) subject to your express consent, sending commercial communications as well as sending advertising on Company products and services, or performing market researches (“Marketing”);
- d) subject to your express consent, analyzing your behaviors, habits and propensity to consume to enhance products and services provided by the Company as well as satisfy your expectations (“Profiling”);
- e) subject to your express consent, communicating Data to the companies controlled directly or indirectly by Ferrari N.V. and/or connected to Ferrari S.p.A. (“Ferrari Group Companies”) that will process them to send commercial communications as well as advertising on their products and services, or perform market researches (“Marketing Ferrari Group Companies”).

The Data may be processed in hardcopy, or by automated or electronic means including via mail or e-mail, telephone (e.g. automated phone calls, SMS, MMS), fax and any other means (e.g. web sites, mobile apps).

Consequences of failure to provide the data

Submitting Data is not mandatory; however, by not providing the Data marked as mandatory this would prevent the Company from providing the Service. On the other hand, by not providing the optional Data this will still allow you to access the Service. Recipients of the Data may process the Data using natural persons and/or legal entities, acting on behalf of the Club and under specific contractual obligations, based in EU Member States or in countries outside the EU. The Data may be communicated to third parties to comply with legal obligations, to execute Public Authority orders, or to exercise a right of Club before judicial authorities.

Data transfer outside of the EEA

Within its contractual relationship the Club may transfer the Data to countries outside of the European Economic Area (EEA), including to store in databases managed by entities acting on behalf of the Club. Database management and Data processing may only be carried out for purposes of processing and in accordance with applicable law. In the event that Data is transferred outside of the EEA then the Club will use appropriate measures in accordance with the standard rules adopted by the EU Commission to regulate the transfer of personal data outside of the EEA.

Controller and data protection officer

The Controller is Scuderia Ferrari Club S.c.ar.l., with registered office in via Abetone Inferiore 4, Maranello (MO), Italy. You can contact the Data Protection Officer at the email address privacy@scuderiaferrari.club

Data retention

The Data processed in order to provide the Service and Customer Satisfaction will be held by the Club for a period to be determined as necessary in order to complete the approved uses and Services. With regard to Data processed for the provision of the Service, the Club may continue to store such Data for as long as may be necessary to protect Club's interests regarding potential liability relating to provision of Services. The Data processed for Marketing purposes will be kept by the Club from the time of consent until such consent is withdrawn. After consent is withdrawn, Data will no longer be used for such previously consented purposes, however such Data may still be retained by Club to manage any future claims and/or lawsuits. Data retention for Marketing purposes will be compliant with local laws and current regulations of the Data Protection Authority.

Your rights

You can exercise the following rights:

1. Right to access means the right to obtain information from the Club as to if and how your Data are being processed and if applicable, reasonable access to such Data;
2. Right to rectification and right to erasure means the right to rectification of any inaccurate and/or incomplete Data, as well as the erasure of Data for any legitimate reasons;

3. Right to restriction of processing means the right to request suspension of any future processing for any legitimate reason;
4. Right to data portability means the right to obtain Data in a format that is commonly used and readable, as well as the right to transfer of such Data to other controllers;
5. Right to object means the right to object to the processing of Data when the request is legitimate, including if the Data are processed for marketing or profiling, as applicable;
6. Right to lodge a complaint with a supervisory authority in case of unlawful processing of Data.

You can exercise the abovementioned rights by writing to Ferrari S.p.A., Via Abetone Inferiore N.4. Maranello (MO). Italy or to the email address privacy@scuderiaferrari.club.

SFC Silverstone specific policy, procedure, and protocol

SFC Silverstone is not a data controller, we use the systems as provided under our licence agreement with Scuderia Ferrari Club S.c.a.r.l [SFC]

SFC Silverstone are a data processor / administrator only.

This involves a SFC managed email client and a SFC managed web portal to add and process membership data.

The club President is the nominated Data Protection Officer [DPO] as he is ultimately responsible to ensure that the club is operated compliantly, and, due to the Ferrari implemented structures, is the only club member to receive, see, and process members information.

1. What data do we receive?

1.1 Statutory / minimum required information for to enable us to process membership, this is :- Full Name, Date of Birth, Postal Address.

1.2 Optional information supplied to aid communication - Email Address, Phone number.

1.3 The member gives us their preferences to 4 statements in relation to privacy policy. These can be seen on page 7.

2. How do we receive and process the data we receive?

2.1 We receive physical paper forms completed with the minimum data we need to register the applicant as a member within the Ferrari Portal as specified in 1.1

2.1.1 Once received or as soon as is practically possible the applicants data is entered into the SFC portal.

2.1.2 Once this data has been entered the physical paper form is filed, archived and stored within in a locked metal document cabinet kept in a secure location

2.1.3 We keep and store paper copies of the form for a period of 3 years unless requested otherwise. At which point old forms are removed from the archive and nano shredded.

2.1.4 It is the responsibility of the DPO to ensure this is adhered to.

2.2 We receive emails with the same membership data.

2.2.1 These are received via the SFC email account only.

2.2.2 Once received as soon as is practically possible the applicants data is entered into the SFC portal.

2.2.3 Once this data has been entered the email is printed as a hard copy as a record of the membership application, and treated as per section 2.1 and the email is deleted.

2.3 The members name and address is also used for shipping of the members card.

2.3.1 For members in the UK this is via Royal Mail and the users name and address will be entered to allow the membership card to be shipped to them.

This data will be entered into the Royal Mail 'Click and drop' web portal managed user portal which is secured via a unique user name and password.

2.3.2 For members in Europe or Globally this will also be Royal Mail and the users name and address will be entered to allow the membership card to be shipped to them.

This data will be entered into the Royal Mail 'Click and drop' web portal and the log into this system is secured via a unique user name and password.

3. How long do we keep the data?

3.1 We only log the members data whilst they are a member of the club and a further period of 3 years, after their membership lapses, expires, or the member withdraws their membership.

3.2 After this period their record is deleted from the SFC portal and any relevant shipping portal plus any hard copies of data we may hold are nano shredded.

3.3 A member at any time can request that their personal data is removed from our archives.

4. What do we do with peoples data?

4.1 We only use the data for the purposes of administering their membership to the club.

4.1.1 This is to allow us to send the membership pack, plus to allow us to inform members of club events and activities.

4.1.2 Each member receives a club handbook which details what data we have and how we manage this data, this document is linked to this privacy policy

4.1.3 This privacy policy is made available to all members and also available to download via the clubs website www.sfcsilverstone.co.uk

4.1.4 Any member at any time can ask us to remove data and we will action accordingly.

4.1.5 We do not sell on or pass data to any third parties for any purpose.

4.2 We have a email database where we send emails only related to club activity, events, offers, and the Ferrari team activities in Formula one, GT racing series, and the Ferrari young driver academy.

4.2.1 Any member at any time can ask us to remove their email address and unsubscribe from the mailing list and we will action accordingly.

5. Email Communication

5.1 See points 4.2 & 4.2.1 as above

5.2 We will never email a recipient who has not contacted us directly in the first instance.

5.2.1 We do not as default add email addresses received to any mailing list
The only email mailing list is as mentioned in point 4.2 which is only for subscribed members where this is needed for the member to be informed of club business as outlined.

5.2.2 Any member at any time can ask us to remove their email address and unsubscribe from the mailing list and we will action accordingly.

6. Website

6.1 The club does not track, gather cookies or any information regarding the person viewing or using the site.

6.2 The website has a contact form which is linked to the official SFC email account so that general enquiries can be sent direct from the website.

6.2.1 These website contact form emails are treated as per section 5. on Email communication.

6.2.2 The contact us section of the website also has the links for our social media accounts. we will not use our social media accounts to send or receive data, only as a method of supplying information to members / prospective members

6.3 The website will be updated regularly with any changes

6.3.1 The latest copy of this privacy policy is available to view and download from the clubs website at www.sfcsilverstone.co.uk

6.4 The website now has the ability to receive membership data via an online application form this form is emailed to the official SFC email account to be processed and handled as per section 2.2 and as per section 5 on Email communication.

6.4.1 The website now has the ability to take payment for membership and these payments are administered and controlled via the clubs official PayPal account. No financial information is processed via the clubs website only via PayPal.

6.5 The clubs website was a valid SSL certificate and a https web address prefix.

6.6 The club website has a banner when users first enter the site to advise them of our website privacy settings which the user has to click to acknowledge, and a link to our privacy policy is on the lower menu of the site.

6.7 The last website update / review was December 2019.

7. Responsibility

7.1 The club has a board of management and a President.

It is the collective responsibility of the board that this policy is implemented and adhered to at all times where required it is reviewed, updated and these updates documented.

7.2 The club will complete an annual review of this policy on a 12 monthly basis and/or if new information comes to light that necessitates this to be done sooner.

7.3 The clubs President has been allocated the role as DPO due to the SFC structures and how they only allow the President to receive and process membership data.

8. Review

8.1 Reviews to this policy will be made once per year or when information is brought to light that necessitates review or change.

8.2 Privacy policy last reviewed in January 2021 by J.Hough Club President and issued to club board for consultation.

8.3 Amends to update the document with the new SFC CI with use of new logo. Amend information in line with SFC 2021 membership offerings, with the removal of the term 'welcome kit' and replaced with term 'membership card' therefore some amends were made to 2.3 to reflect this changes

Your Consent

I have read and accept the foregoing Privacy & Data Protection Policy of Scuderia Ferrari Club S.c.a.r.l and Scuderia Ferrari Club Silverstone and agree or do not agree to the following four options by answering the below statements -

TO MY PERSONAL DATA BEING PROCESSED BY SCUDERIA FERRARI CLUB S.C.AR.L. FOR MARKETING PURPOSES STATED IN POINT C) OF THE PRIVACY NOTICE, IN HARDCOPY, BY AUTOMATED OR ELECTRONIC MEANS INCLUDING VIA MAIL OR E-MAIL, PHONE (E.G. AUTOMATED PHONE CALLS, SMS, MMS) AND ANY OTHER MEAN (E.G. WEB SITES, MOBILE APPS).

I AGREE

I DO NOT AGREE

TO MY PERSONAL DATA BEING PROCESSED BY THE TERRITORIAL CLUB SCUDERIA FERRARI CLUB SILVERSTONE – UNITED KINGDOM FOR MARKETING PURPOSES STATED IN POINT D) OF THE PRIVACY NOTICE, IN HARDCOPY, BY AUTOMATED OR ELECTRONIC MEANS INCLUDING VIA MAIL OR E-MAIL, PHONE (E.G. AUTOMATED PHONE CALLS, SMS, MMS) AND ANY OTHER MEAN (E.G. WEB SITES, MOBILE APPS).

I AGREE

I DO NOT AGREE

TO MY PERSONAL DATA BEING PROCESSED BY SCUDERIA FERRARI CLUB S.C.AR.L. TO ANALYZE MY PREFERENCES AND RECEIVE CUSTOMIZED COMMERCIAL COMMUNICATIONS, AS STATED IN POINT E) OF THE PRIVACY NOTICE.

I AGREE

I DO NOT AGREE

TO MY PERSONAL DATA BEING COMMUNICATED BY SCUDERIA FERRARI CLUB S.C.AR.L. TO OTHER FERRARI GROUP COMPANIES FOR THE MARKETING PURPOSES STATED IN POINT E) OF THE PRIVACY NOTICE, IN HARDCOPY, AUTOMATED OR ELECTRONIC MEANS INCLUDING VIA MAIL OR E-MAIL, PHONE (E.G. AUTOMATED PHONE CALLS, SMS, MMS), FAX AND ANY OTHER MEAN (E.G. WEB SITES, MOBILE APPS).

I AGREE

I DO NOT AGREE