



This Privacy and Cookies Policy and any terms expressly incorporated herein (the "**Policy**") govern the access to and use of all parts of the website and mobile application branded as Ferrari Pay and referring to the domain <https://www.ferrari-pay.com/> (the "**Website**", "**App**") and all documents, data, materials or other information made available on the Website.

Your access to and use of the Website and/or App is conditioned on your acceptance of and compliance with the Policy. The Policy applies to all visitors, users, Clients and others who access or use the Website and/ or App.

These Terms may be made available in several languages; all versions are legally binding, but in the event of inconsistency between the English version and a translated version, the English version prevails.

Last updated: April 16th, 2022.

FRIPRO OÜ (legal entity code: 14370373, registered office address: Parda tn 10/12, Tallinn, 10151, Estonia, e-mail: info@fripro.trade) is the data controller for personal information collected and processed in connection with provision of Ferrari Pay services.

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1. ABOUT FERRARI PAY

- 1.1. The website branded as 'Ferrari Pay' and referring to the domain <https://www.ferrari-pay.com/> ("Website") is operated by FERRARI-PAY SOFTWARE SOLUTION LTD company, which is based in United Kingdom –

3rd Floor 86-90 Paul Street, London, United Kingdom, EC2A 4NE, with a registration No: 12900444 (*"Ferrari Pay", "We", "Us", or "Our"*).

- 1.2. Ferrari Pay, without taking on its own risk, operates and manages a publicly accessible internet-based information system that is branded as '*Ferrari Pay*', available via the Website, and open to the public in order to connect the clients to technological tools through the use of the Ferrari Pay platform providing them the collaboration partner services such as (i) e-banking, (ii) exchange, (iii) crypto-wallets, (iv) payment cards (both virtual and physical), (v) token staking and (vi) Marketplace. Ferrari Pay operates as a neutral intermediary between the users.

2. PURPOSE

- 2.1. We respect your privacy, and We care about your data protection, its security and confidentiality. This Policy explains what personal data We collect and how We will process it when you visit Our Website or contact Us.

3. CATEGORIES OF PERSONAL DATA

- 3.1. If you wish to use Our Website and gain access to the services We provide, you have to register in Our Website and provide Use the following information:
 - 3.1.1. name, surname;
 - 3.1.2. date of birth;
 - 3.1.3. gender;
 - 3.1.4. home address;
 - 3.1.5. nationality;
 - 3.1.6. email address;
 - 3.1.7. phone number;
 - 3.1.8. other information to help Us identify you.
- 3.2. If you sign up as an entity (e.g., a company, partnership, trust, etc.), you may also need to provide us with pertinent information about your entity, including:
 - 3.2.1. entity name;
 - 3.2.2. representative person's name, surname;
 - 3.2.3. entity documents
 - 3.2.4. address;
 - 3.2.5. email address;
 - 3.2.6. phone number;
 - 3.2.7. other information to help Us identify you.
- 3.3. We may collect referral URLs, your location, and blockchain analytics information related to blockchain addresses you provide. Some of the personal data used by the blockchain and crypto exchange services is public information and can be seen by others, including, your public address and the type and amount of digital assets transferred. Additionally, certain technologies, such as blockchain, are immutable meaning that information, including personal data, cannot be deleted from the ledger.

4. **PURPOSE OF PERSONAL DATA PROCESSING AND LEGAL BASIS**

- 4.1. We collect and process your personal information in order to provide and continually improve Our products and services, to protect the security of our users, as well as to comply with laws and regulations.
- 4.2. The EU GDPR laws require a legal basis for our use of personal information. Our basis varies depending on the specific purpose for which We use personal information. We rely on:
 - 4.2.1. performance of a contract when We provide you with products or services, or communicate with you about them. This includes when We use your personal information to take and handle orders, and process payments;
 - 4.2.2. Our legitimate business interests and the interests of our users when We detect and prevent fraud and abuse in order to protect the security of Our users, ourselves, or others;
 - 4.2.3. your consent when We ask for your consent to process your personal information for a specific purpose that We communicate to you. When you consent to our processing your personal information for a specified purpose, you may withdraw your consent at any time and We will stop processing of your data for that purpose.
 - 4.2.4. compliance with a legal obligation when We use your personal information to comply with laws. For instance, We collect bank account information for identity verification purposes;
 - 4.2.5. these and other legal bases depending on the purpose for which We use personal information.
- 4.3. When you visit Our Webpage, We may also collect technical usage data, such as information on your device and browser, IP address and other reasonably required information. We process this data based on Our legitimate interests to ensure Our network security, monitor the Webpage, and improve its functionality.
- 4.4. Our Website uses cookies and similar technology such as web pixels. If you have provided your consent, in addition to the cookies, which ensure website functionality, We may collect analytical data. For further information, please see Section 8.

5. **DATA RETENTION**

- 5.1. We will process your personal data as long as any of the above-mentioned data processing purposes or legal basis are still valid. For example, if you withdraw your consent, We will cease the processing of personal data, which has been based on your prior consent.

6. **DATA TRANSFER**

- 6.1. We may share your personal data with selected third parties, including business suppliers, distributors and subcontractors, when it is necessary for the delivery of Our services, or when there is a legal basis to do so. The aforementioned third parties only collect, use and disclose your information in the ways indicated by Us in order to provide adequate services.

- 6.2. When We share your personal data to the third parties, We comply with the applicable data protection legal norms, specifically:
- 6.3. We transfer only the minimum amount of data necessary for a particular outsourced service provider;
- 6.4. We only cooperate with the outsourced service providers who can provide and ensure adequate levels of personal data protection.
- 6.5. If any of the third parties are located outside the EU / EEA, We will share your data in accordance with the requirements set in the applicable personal data protection legal norms, including:
- 6.6. by entering into EU standard contractual clauses or by using other appropriate grounds for data transfer provided by applicable legal norms such as codes of conduct and certifications;
- 6.7. cooperating with the outsourced service providers located in a country, which offers an adequate level of data protection in accordance with the European Commission decision.

7. MARKETING

- 7.1. In accordance with applicable law, We may share your personal information with our marketing partners for the purposes of targeting, modeling, and/or analytics as well as marketing and advertising.

8. COOKIES

- 8.1. We use cookies to enhance your online experience. Cookies are small data files that are stored on your computer's hard drive, and in addition to using cookies to provide you with a better user experience, we use cookies to identify and prevent fraudulent activity. The information collected can include, but is not limited to, your IP address, referral URLs, the type of device you use, your operating system, the type of browser you use, geographic location, and other session data. Cookies are not permanent and will expire after a short time period of inactivity.
- 8.2. We use different types of cookies. When you access the Website, we will place strictly necessary cookies on your browser or device. Other types of cookies will be stored only if you have accepted the use of such cookies. Here are more details on cookies, which may be stored on your device or browser when you access Our Website:
 - 8.2.1. **strictly necessary cookies:** strictly necessary cookies help to make the Website easy to use by providing basic functions such as page navigation, language selection, authorization and filling in forms. The Website will not function without these cookies and they cannot be disabled. These cookies do not reveal the user's identity or collect user information. They are stored on the user's device until the browser is closed;
 - 8.2.2. **analytical cookies:** these cookies allow Us to count visits and traffic sources so we can measure and improve the performance of Our Website. They help Us to know which pages are the most and least popular and see how visitors move around the Website. All information that we receive from these cookies are in aggregated form. We use third party cookies, which are set on your device for up to 2 years or deleted, if you erase your browser cookie data;

- 8.2.3. **marketing and targeting cookies:** these cookies may be set through Our Website by Our advertising partners. They may be used by those companies to build a profile of your interests and show you relevant adverts on other sites. They do not store directly personal information but are based on uniquely identifying your browser and internet device. If you do not allow these cookies, you will experience less targeted advertising. These cookies are set on your device for up to 2 years or deleted, if you erase your browser cookie data.
- 8.3. We may use third party APIs and software development kits ("SDKs") as part of the functionality of Our services. APIs and SDKs may allow third parties including analytics and advertising partners to collect your personal data for various purposes including to provide analytics services and content that is more relevant to you. For more information about our use of APIs and SDKs, please contact us.

9. THIRD PARTY COOKIES

- 9.1. Our Website uses third-party services, such as analytics, to let Us know what is popular on Our Website and what is not, thus making Our Website more usable. The following third-party services may be used:
 - 9.1.1. Google Analytics cookies to measure Our users' interactions with the content of Our Website. These cookies collect information about your interaction with the Website, such as unique visits, repeat visits, session duration and Website activity;
 - 9.1.2. Facebook pixels to process information about a user's activity on Our Website, such as the Website visited, Facebook identity, browser data, and more. The information processed from Facebook pixels is used to serve ads based on your interests through Facebook, as well as to measure cross-device conversions and user interactions on Our Website.
- 9.2. Any information obtained from third-party cookies is processed by the respective service provider. We kindly recommend that you read the Policy of these service providers for more detailed information.
- 9.3. You may opt-out of the processing of third-party cookies at any time.

10. YOUR RIGHTS

- 10.1. Under certain circumstances, you have rights under data protection laws in relation to your personal data which are set out in more detail below:

Request access	This enables you to receive a copy of the personal data We hold about you and to check that We are lawfully processing it. This is also commonly known as a "data subject access request".
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Request correction	This enables you to have any incomplete or inaccurate data We hold about you corrected, though We may need to verify the accuracy of the new data you provide to Us.
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If you need to add or change any information, you can log into your account and make the change in your settings. If it doesn't look like you can make the change on your own, please reach out to Our customer support and We will take care of it.

Request deletion	This enables you to ask Us to delete or remove personal data where there is no good reason for Us continuing to process it. Please note that there may be circumstances where We may be legally entitled to retain your personal data.
Object to processing	<p>You have the right to object to the processing of your Personal Data where We are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.</p> <p>You also have the right to object where we are processing your personal data for direct marketing purposes.</p>
Request restriction of processing	This enables you to object to the processing of your personal data, which is processed based on Our legitimate interests. In the event of such an objection, We will no longer process your personal data, unless We will demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of legal claims.
Request to transfer	If you ask Us, We will provide you or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
Withdrawal of consent	<p>This applies where We are relying on consent to process your personal data. Please be aware that the withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal.</p> <p><u>If you withdraw your consent, We may not be able to provide certain products or services to you.</u></p>
Right to lodge a complaint with a supervisory authority	If you consider that the processing of your personal data by Us infringes your rights, you have the right to lodge a complaint with a supervisory authority.

- 10.2. To exercise these rights concerning Us, please contact Us using the e-mail address indicated in this Policy. We will process this request within 30 (thirty) calendar days and provide an answer.

11. HOW TO CONTROL COOKIES

- 11.1. When you visit Our Webpage, you will see an informative statement that the Website uses cookies and a request of your consent to enable analytical and marketing cookies.
- 11.2. You can withdraw your consent for analytical and/or marketing cookies or change cookie settings, as well as delete all cookies stored in your browser by deleting your browser cookie history. You can also set up your browser to block cookies being saved. By clicking on the “help” button in your browser, you can find instructions on how to prevent the browser from storing cookies, as well as what cookies are stored already and delete them, if you want to.
- 11.3. Changes to the settings must be made for each browser that you use.

- 11.4. You can also separately opt-out from having your Website activity available to Google Analytics by installing the [Google Analytics opt-out browser add-on](#), which prevents sharing information about your Website.

12. CONTACT US

- 12.1. Our Data Protection Officer can be contacted at info@fripro.trade, and will work to address any questions or issues that you have with respect to the collection and processing of your personal information.

13. MODIFICATIONS

- 13.1. We reserve the right, at Our sole discretion, to modify, amend, supplement or replace this Policy at any time. We will review and revise this Policy when there are any material circumstances arisen that may affect Our ability to apply this Policy pursuant to the provisions of statutory and law requirements. What constitutes a material change will be determined at Our sole discretion.
- 13.2. We will inform Our Clients on all material amendments to this Policy by publishing the updated version of this Policy on Our Website. When an updated version of the Policy is released, your continued access to the Website means that you agree to the updated content and agree to abide by the updated Policy.

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