

Privacy Policy for More than Equal

Effective Date: 6th March 2024

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1.0 General Privacy Policy

1.1 Introduction

Welcome to More than Equal ("we," "our," or "us"). This privacy policy outlines our commitment to the privacy and protection of personal information collected from individuals who interact with our organisation and services.

This Privacy Policy explains how More than Equal use any personal information about you that is collected or generated through your participation in, or use of:

- our More than Equal website, <https://www.morethanequal.com> (including any other media form, media channel, mobile website, or mobile application related or connected thereto (collectively, the “Site”))
- our More than Equal events (e.g. webinars, roundtables)
- our More than Equal survey and interview-based research studies
- our More than Equal driver profiling and monitoring programme

1.2 Information We Collect

We may collect various types of personal information from individuals who engage with our organisation. This may include names, contact details, training and performance data, personal health information, attitudes and perceptions and other relevant information necessary for our activities.

1.3 How We Collect Information

We collect personal information through various channels, including our website, events, research studies, training and performance monitoring programmes, and communication with individuals interested in or supporting our mission and using our services.

There will be instances where we collect data from individuals under the age of 18 years old. But in these instances, we always get consent from their parents/guardians to do so.

All personal information and data we collect for individuals is treated as strictly private and confidential and we will never share data in any format without prior written consent of the individual (and their parent/guardian in instances where they are under the age of 18 or a vulnerable adult).

1.4 Purpose of Collection

The personal information we collect is used for specific purposes including:

- Providing information about our research, programs, events, and initiatives.
- The identification and training of talented drivers.
- To inform the creation of guidelines, policies and educational materials and reports.
- Analysing and improving our programs and services.
- Complying with legal and regulatory requirements.
- Conducting analytics to understand user preferences and enhance our offerings.

1.5 Legal Basis for Processing

Our processing of personal information is based on legal grounds (including compliance with all UK and EU laws and regulations), including consent, contractual necessity (e.g., processing donations), compliance with legal obligations, and the legitimate interests pursued by our organisation.

1.6 Use of Cookies and Tracking Technologies

We use cookies and similar technologies on our website to enhance user experiences, analyse trends, and administer our site. Users have the option to manage cookie preferences through their browser settings.

1.7 Data Retention

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, ethical, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

You may request removal of your personal information at any time by written request in accordance with this Policy. We will always liaise with you to manage any such request.

1.8 Security Measures

We use administrative, technical, and physical security measures to help protect your personal information from unauthorized access, disclosure, alteration, and destruction. These measures include encryption, access controls, mandatory staff GDPR training and regular security assessments. While we have taken reasonable steps to secure the personal information you provide to us, please be aware that despite our efforts, no security measures are perfect or impenetrable, and no method of data transmission can be guaranteed against any interception or other type of misuse. Any information disclosed online is vulnerable to interception and misuse by unauthorized parties. Therefore, we cannot guarantee complete security if you provide personal information. However, whenever we are made aware of any data breaches, we will communicate the same to you promptly.

1.9 Third-Party Sharing

We may share personal information with trusted third parties, such as service providers, to support our activities. These third parties are obligated to maintain the confidentiality and security of the information to an equivalent standard as our own. We do not share, sell, rent, loan or give out your name, email address, or other personal data to anyone. However, if the service provider or all of its assets would be acquired, customer information might be transferred to the acquiring party. Details of the specific service providers that we use are shared in the following sections of this privacy policy e.g. survey and interview-based research.

1.10 User Rights

Individuals have the right to access, correct, update, or delete their personal information. They can also object to certain processing activities. Refer to section 2.0 in this document for more information on “Data Protection Rights under GDPR”. Users can exercise these rights by contacting us using the "Contact Information" provided in section 1.13 below.

1.11 Opt-Out and Consent

Users have the option to opt out of certain communication and processing activities. When processing your personal information that specifically identifies you, consent is obtained where required, and users can withdraw their consent at any time.

1.12 Updates to the Privacy Policy

We reserve the right to make changes to this Privacy Policy at any time and for any reason. We will alert you about any changes by updating the “Last Updated” date of this Privacy Policy. Any changes or modifications will be effective immediately upon posting the updated Privacy Policy on the Site, and you waive the right to receive specific notice of each such change or modification.

You are encouraged to periodically review this Privacy Policy to stay informed of updates. You will be deemed to have been made aware of, will be subject to, and will be deemed to have accepted the changes in any revised Privacy Policy by your continued use of More than Equal’s services.

1.13 Contact Information

If you have questions or comments about this Privacy Policy, please contact us at:

More than Equal limited
10 Upper Bank Street
London
E14 5JJ
info@MorethanEqual.com

1.14 Compliance with Laws

We are committed to complying with applicable data protection laws and regulations, respecting the privacy rights of individuals who support our organisation and interact with our services.

2.0 Data Protection Rights under GDPR

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. More than Equal aims to take reasonable steps to allow you to correct, amend, delete or limit the use of your Personal Data.

If you wish to be informed about what Personal Data we hold about you and if you want it to be removed from our systems, please contact us using the “contact information” provided in section 1.13 of this document.

In certain circumstances, you have the following data protection rights:

- **Right to Access:** You have the right to request access to the personal information we hold about you. This allows you to be aware of and verify the lawfulness of the processing.
- **Right to Rectification:** If the personal information we hold about you is inaccurate or incomplete, you have the right to request corrections.
- **Right to Erasure (Right to be Forgotten):** In certain circumstances, you have the right to request the deletion of your personal information. This right is not absolute and may be subject to legal obligations or other legitimate grounds for retaining data.
- **Right to Restriction of Processing:** You can request the restriction of processing of your personal information under certain conditions. This means we may store your data but not process it further.
- **Right to Data Portability:** You have the right to receive the personal information concerning you in a structured, commonly used, and machine-readable format. You also have the right to transmit this data to another controller where technically feasible.
- **Right to Object:** You can object to the processing of your personal information under specific circumstances. We will cease processing your data unless we can demonstrate compelling legitimate grounds for processing that override your interests, rights, and freedoms.
- **Rights Related to Automated Decision-Making, Including Profiling:** You have the right not to be subject to decisions based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.
- **Right to Withdraw Consent:** Where we rely on consent for the processing of your personal information, you have the right to withdraw that consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

To exercise any of these rights or if you have questions regarding the processing of your personal information, please contact us using the information provided in the "Contact Information" section of this privacy policy.

We will respond to your requests within the timeframes specified by applicable data protection laws. Please note that certain rights may be subject to exemptions or restrictions based on legal requirements.

If you believe that the processing of your personal information violates data protection laws, you have the right to lodge a complaint with a supervisory authority.

3.0 Survey and interview-based research studies

More than Equal undertakes survey and interview-based research studies with relevant stakeholders including drivers, fans, sponsors, employees and parents etc to better understand the motorsports environment (e.g. the environmental and cultural barriers facing female drivers).

When conducting such studies, we adhere to the general privacy principles and data protection rights outlined on pages 2 – 6 but also follow specific principles outlined on pages 7 – 8.

3.1 Personal data and consent

- Before taking part in a More than Equal research study participants must provide their informed consent for the collection, processing and use of their personal data. Personal data is collected and processed in accordance with their consent.
- We only collect and process personal data that is necessary for the research study. We do not collect personally identifiable information (e.g. names, email addresses) unless it is necessary.

3.2 Data anonymisation and aggregation

- We anonymise and aggregate data collected in our research studies and carry out the processing steps required for anonymization and aggregation.
- Anonymised or aggregated data shall no longer be considered personal data and shall not be covered by the obligation to disclose or delete data (e.g. “right to erasure”). We shall be entitled to use and store such data for its own purposes beyond the end of the research study.

3.3 Data sharing, storage and processing

- We will share and store your personal information with our survey and interview-based research service providers who from time to time will act as processors based in the United Kingdom and European Union. Below is a non-exhaustive list (which we may update or supplement from time to time) of our providers. Some of our service providers may use further sub-processors and for full details, please see their respective privacy policies.
 - Microsoft Cloud
 - Google suite
 - MS teams
 - Zoom
- We might work with research partners such as universities but will share only anonymised and aggregate data with them.

3.4 Data dissemination

- We will produce anonymised aggregate-level research reports that will be published publicly. These reports are only produced, when sample sizes are large enough to ensure that individuals cannot be personally identified from the aggregated and anonymised data.

3.5 Children's and vulnerable adult's data

- There may be instances where More than Equal conducts research with U18s or any vulnerable adults. In these instances, all the same data privacy processes will be adhered to including the anonymisation and aggregation of data, the secure sharing, storage and processing of data and the dissemination of anonymised and aggregated research reports. However, for studies with U18s or any vulnerable adults, parental/guardian consent will also be required to grant permission for the collection, processing and use of the child's or vulnerable adult's personal data. Personal data is collected and processed in accordance with both sets of consent provided.

4.0 Driver profiling and monitoring

More than Equal annually collects personal health information and training and performance data on a selection of drivers. This data is used to aid the identification, training and development of talented drivers.

Varying levels of data on the personal health, training and performance of drivers may be collected from several sources including:

- Applications to More than Equal’s Driver Development Programme
- More than Equal’s Driver Development Programme
- More than Equal’s Driver Community

When profiling and monitoring the personal health, training and performance of drivers, More than Equal adheres to the general privacy principles and data protection rights outlined on pages 2 – 6 but also follows specific principles outlined on pages 9 – 11.

4.1 Personal data and consent

- Before personal data on the health, training and performance of any driver is gathered, drivers (and their parents/guardians if they are under the age of 18 years old or a vulnerable adult) are required to give their informed consent to both More than Equal and their nominated data collection and storage service provider (e.g. Kitman Labs and Hintsia although this could be subject to change) to collect, process and use their personal data. See below for details on how data will be processed and used.
- Categories of personal data that may be collected from drivers are listed in Table 1.
- The level of personal health, training and performance data collected from drivers may vary depending on the source that it is collected from. For example, the health, training and performance data collected from applicants to More than Equal’s Driver Development Programme will not be as in-depth as the data collected from those who are selected to participate in the Driver Development Programme.

Table 1: Categories of data collected

CATEGORIES	DATA INCLUDED IN CATEGORY
Identity data	Name, Gender, DOB, Performance Reference Number, Photograph, Video, Age, Academic Background, Region, and social media accounts.
Contact data	Home phone number, email address, home address and mobile phone number.

Sport & performance data	Training location, Racing discipline, performances, attendance at events, home nation, height, weight, test data, performance trajectory, sports intelligence, mental and physical fitness assessments, technical assessments, team feedback, eligibility data, criminal convictions, racial or ethnic origin, health data, right to work, physiological data, biometric data, Driver status, nationality, ranking information, event results, selection date, gender, leaving date, career aspirations and sporting interests.
Equal opportunities data	Gender, racial or ethnic origin, sexual orientation, age, criminal convictions.
Health data	Test data, sickness and injury, doping violations and biometric data, medical records and other Driver health/performance information.
Finance data	Sponsorship, personal investment, team investment.

- To build a detailed picture of a drivers' health, training and performance, in some instances (e.g. for drivers on the Driver Development programme), coaches and other relevant stakeholders (e.g. sport scientists, parents) may be invited to provide information on the driver (e.g. reviews, ratings of performance, fitness results). Before this happens, drivers (and their parents/guardians if they are under the age of 18 years old or a vulnerable adult) will be required to give their consent for their coaches and other relevant stakeholders (e.g. sport scientists) to a) provide information on them, and/or b) access/input information into their training and performance monitoring data storage system (e.g. Kitman Labs).
- Before starting any driver health, training and performance profiling and monitoring, if data is required from relevant stakeholders (e.g. the driver's coach, sport scientist, parents/guardians) they will be required to give their informed consent to both More than Equal and the data storage service provider (e.g. Kitman Labs) to collect, process and use their personal data.
- Different sources of driver data (e.g. gender, sleep, age, training status, mental and physical fitness etc.) will be triangulated with publicly accessible driving results data to build a clear picture of a driver's training and performance status, and to more generally build a profile of what top drivers 'look' like at different levels of competition. However, at no point will drivers be made personally identifiable without first receiving the relevant written consents (see section 4.4 for further information).

4.2 Data anonymisation and aggregation

- Where possible, we anonymize and aggregate training and performance monitoring data and carry out the processing steps required for anonymization and aggregation.
- While maintaining anonymity, we may process and use all data for purposes such as understanding the strongest predictors of driver performance at different stages of development.

- Anonymized or aggregated data shall no longer be considered personal data and shall not be covered by the obligation to disclose or delete data. We shall be entitled to use and store such data for its own purposes beyond the end of the training and performance monitoring period.

4.3 Data sharing, storage and processing

- We will share and store your personal information with our service providers who from time to time will act as processors based in the United Kingdom and European Union. Below is a non-exhaustive list (which we may update or supplement from time to time) of our service providers and the scope of the services that they provide to us. Some of our service providers may use further sub-processors and for full details, please see their respective privacy policies.
 - Microsoft Cloud
 - FLO
 - MS Teams / Zoom
 - R studio
 - Kitman Labs
 - Hintsa
 - Smedley Group
- To build a clear picture of driver talent and performance we might work with research partners such as universities. We may share different types of anonymised driver data with them.

4.4 Data dissemination

- We will produce anonymised aggregate level research reports that will be published publicly. These reports are only produced, when sample sizes are large enough to ensure that individuals cannot be personally identified from the aggregated, anonymised data.
- We will create an anonymised database of the training and performance status of drivers. Data on each driver will be referred to as their “driver passport.” This anonymised database will be shared with relevant stakeholders including team managers. Drivers will not be personally identifiable but if a team manager is interested in the profile of a specific driver More than Equal will contact the driver and their parent/guardian and ask for consent to share their contact details with the team manager and in doing so de-anonymise their driver passport. This process will potentially support with the identification of talented drivers.

4.5 Children’s and vulnerable adult’s data

- There may be instances where More than Equal monitors the training and performance of U18 drivers or any vulnerable adults. In these instances, all the same data privacy processes will be put in place including the anonymisation and aggregation of data, the secure sharing, storage and processing of data and the dissemination of research reports/driver passports based only on the presentation of anonymised non-identifiable information. However, parental/guardian consent will also be sought to cover for the collection, processing and use of the child’s or vulnerable adult’s personal data. Personal data is collected and processed in accordance with both sets of consent.

5.0 Website and cookies

5.1 Introduction

When users access our website <https://www.morethanequal.com/>, including any other media form, media channel, mobile website, or mobile application related or connected thereto (collectively, the “Site”), More than Equal adheres to the general privacy principles and data protection rights outlined on pages 2 – 6. However, we also follow some other specific principles outlined on pages 12 – 17 of this document which explain how we collect, use, disclose, and safeguard your information when you visit our website. Please read this privacy policy carefully. If you do not agree with the terms of this privacy policy, please do not access the Site.

5.2 Collection of your information

We may collect information about you in a variety of ways.

5.2.1 Personal information

Information that you provide to us directly when you contact us via our “contact us” form, complete application forms (e.g. for the Driver Development Programme) or when subscribing to our newsletter. This will include your name, surname, email address, company organisation name, and any other information you decide to share with us.

5.2.2 Derivative information

Further, information our servers automatically collect when you access the Site, include your IP address, your browser type, your operating system, your access times, and the pages you have viewed directly before and after accessing the Site. If you are using mobile, this information may also include your device name and type, your operating system, your location, your likes and replies to a post, and other interactions.

5.3 Use of your information

In line with data protection laws, we will only process personal data where we have the legal basis to do so.

The relevant legal foundation for us using your information are:

- where consent has been obtained by you;
- where it is necessary for us to provide services to you under the performance of a contract (contractual necessity);
- where it is in our legitimate interests to process your information, provided that these interests do not prejudice your own rights, freedoms, and interests (legitimate interest); and
- where we are obliged by law to process your personal data (legal obligation).

Against this background, we may use your information in the following ways:

- to manage our ongoing relationship with you including to respond to your request/inquiry/application or otherwise communicate with you (consent/legitimate interest/contractual necessity/legal obligation) to enter into and manage a business and/or contractual relationship with you, including to provide you with information about our company and our services (legitimate interest);
- to provide services to you (contractual necessity);
- to notify you about changes or additions to our services (contractual necessity);
- sending you newsletters and updates regarding our services (consent);
- for internal business purposes such as to ensure proper functioning of our Website and to carry out related statistical analysis on the use of the Website and checks to prevent fraudulent or other inappropriate activities to maintain content integrity on our Website (legitimate interest);
- to generate data analytics to enable us to improve our Website for you and/or deliver relevant Website content to you (consent); and
- to comply with legal obligations that apply to us including but not limited to disclosing your personal data to courts, law enforcement or regulatory authorities (legal obligation).

5.4 Disclosure of your information

We may use third parties and share information we have collected about you in particular situations

5.4.1 Third-Party Service Providers

Service providers may be located inside or outside of the European Economic Area (“EEA”), and will have limited access to your information. They are contractually bound to protect and to use information on our behalf only for the purposes for which it was disclosed. Third parties used by us must ensure the same level of data protection as we and be in line with this Privacy Policy. We are not responsible for third parties’ use of your personal data where such use is permitted for their own purposes, and you should consult their privacy policies for further information. Your information may be disclosed with third parties that perform services for us on our behalf including payment processing, data analysis, email delivery, hosting services, customer service, and marketing assistance.

5.5 Marketing communications

With your consent, or with an opportunity for you to withdraw consent, we may share your information with third parties for marketing purposes, as permitted by law.

5.5.1 Third-Party Advertisers

We may use third-party advertising companies to serve ads when you visit the Site. These companies may use information about your visits to the Site and other websites that are contained in web cookies to provide advertisements about goods and services of interest to you.

5.5.2 Affiliates

We may share your information with our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include our parent company and any subsidiaries, joint venture partners or other companies that we control or that are under common control with us.

5.5.3 Other Third Parties

We may share your information in/with CRM service providers, advertisers and investors for the purpose of conducting general business analysis. We may also share your information with such third parties for marketing purposes, as permitted by law.

5.5.4 Sale or Bankruptcy

If we reorganize or sell all or a portion of our assets, undergo a merger, or are acquired by another entity, we may transfer your information to the successor entity. If we go out of business or enter bankruptcy, your information would be an asset transferred or acquired by a third party. You acknowledge that such transfers may occur and that the transferee may decline honor commitments we made in this Privacy Policy.

We are not responsible for the actions of third parties with whom you share personal or sensitive data, and we have no authority to manage or control third-party solicitations. If you no longer wish to receive correspondence, emails or other communications from third parties, you are responsible for contacting the third party directly.

5.6 Tracking Technologies

5.6.1 Cookies and Web Beacons

We may use cookies, web beacons, tracking pixels, and other tracking technologies on the Site to help customize the Site and improve your experience. By using the Site, you agree to be bound by our Cookie Policy.

5.6.2 Cookie Policy

To improve your experience of this site, we collect certain details that will help us understand how this site is being used. This information will then help us to tailor the site with material that will be both useful and relevant to you and improve your user experience.

The way we collect this information is by using cookies. Please continue to read the rest of this section to understand what cookies are, and how they are used.

5.6.2.1 What are “cookies”?

Cookies are small data files transferred to your computer’s hard drive through your web browser to

enable our systems to recognise your browser and to provide us with details of how our website is used. Please note that cookies can be placed directly by the site or third-party plugins that are used by the site.

A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may, however, prevent you from taking full advantage of the website.

In either case, when you visit <https://www.morethanequal.com/>, we use the information contained within these cookies for the purposes of website improvements. Under no circumstances do we collect personal data to exploit those commercially.

5.6.2.2 Cookie Categories

At <https://www.morethanequal.com/>, the cookies we use can be broken down into the following categories:

- Essential
- Analytics

The Essential cookies are those that are necessary for core functions of this site. For example, we use “geolocation” cookies that help us identify where you are when you visit us. By having this information, we can show you content that is relevant to your region. On other sites, you’ll see these cookies referred to as Functional or Operational.

Cookies in the second category, Analytics, summarise usage patterns that track what pages were accessed, what links were clicked on, the number of visitors to a certain page, and so on. The information here is anonymous and is used to help the More than Equal team make improvements to the site.

5.6.2.3 Cookies on <https://www.morethanequal.com/>

You will notice that when you first visited this site, you would have been presented with a banner that would have alerted you to the use of cookies. This tool is designed to take into account your preferences and disable cookies that you do not wish to have stored.

Please note that this tool cannot be used to disable our essential cookies, as that would affect the performance of the site. In cases where third-party plugins store cookies on their domains, the tool provides you with the link to these sites where you can opt out at any time. If you still wish to block all cookies, you will need to use your browser’s settings. Please use the following links depending on the type of browser you use.

- Firefox
- Chrome
- Safari

- Internet Explorer

For information regarding the specific cookies stored and their uses, please see the chart below:

Category	Name	Publisher	Domain	Length	Purpose
Essential	JSESSIONID	NewRelic	nr-data.net	Session	The platform we use to share the information with the investors (<i>Q4 Investor Relations Success Platform</i>) utilizes NewRelic's monitoring tools to ensure high level of service through proactive infrastructure uptime and availability monitoring.
Essential	site-locale	Q4	q4inc.com	10 hours	Determine location of a site visitor.
Essential	NID	Google	gstatic.com	Persistent	Contains a unique ID Google uses to remember your preferences such as preferred language and number of search results.

5.6.2.4 Additional Information

If you would like to modify your cookie settings for this site, you may do so using our tool or your browser.

5.6.3 Internet-Based Advertising

Additionally, we may use third-party software to serve ads on the Site, implement email marketing campaigns, and manage other interactive marketing initiatives. This third-party software may use cookies or similar tracking technology to help manage and optimize your online experience with us. For more information about opting-out of interest-based ads, visit the Network Advertising Initiative Opt-Out Tool or Digital Advertising Alliance Opt-Out Tool.

5.6.4 Website Analytics

We may also partner with selected third-party vendors, to allow tracking technologies and remarketing services on the Site through the use of first party cookies and third-party cookies, to, among other things, analyze and track users' use of the Site, determine the popularity of certain content and better understand online activity. By accessing the Site, you consent to the collection and use of your information by these third-party vendors. You are encouraged to review their privacy policy and contact them directly for responses to your questions. We do not transfer personal information to these third-party vendors. However, if you do not want any information to be collected and used by tracking technologies, you can visit the third-party vendor or the Network Advertising Initiative Opt-Out Tool or Digital Advertising Alliance Opt-Out Tool.

You should be aware that getting a new computer, installing a new browser, upgrading an existing browser, or erasing or otherwise altering your browser's cookies files may also clear certain opt-out cookies, plug-ins, or settings.

5.7 Children's Privacy

Our website does not directly address anyone under the age of 18 ("Children").

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

6.0 Privacy policy for Events

More than Equal holds events to both educate and gather insights from relevant stakeholders. When running such events, More than Equal adheres to the general privacy principles and data protection rights outlined on pages 2 – 6 but also follows the specific principles outlined on page 18.

- If you attend a More than Equal event, we may collect personal information from you via a website application form, but this will be covered by the privacy terms of the website.
- We may ask you to provide us any dietary requirements or information regarding accessibility. This information destroyed as soon as the event has been held.
- We may also photograph and/or film More than Equal events. Attendees may be requested to sign an image release form, in relation to our use of your image. We observe a strict policy of not sharing images or videos of U18s without written consent of a parent/guardian.
- White paper reports may be published after events summarising the take-home messages, but you will only be referred to by name in such a report if you provide your consent for us to do so. There may be instances where More than Equal hosts events for U18s or any vulnerable adults. In these instances, parental/guardian consent will also be required if an U18 or any vulnerable adult is named in a follow-up white paper report.