



## **Privacy Policy**

AuctionLux (“AuctionLux”, “we”, or “us”) is committed to protecting the privacy of our customers, and we take our data protection responsibilities with the utmost commitment.

This Privacy Policy describes how AuctionLux collects and processes your personal information through the AuctionLux websites and applications that reference this Privacy Policy. AuctionLux refers to a system comprising AuctionLux websites (whose domain names include but are not limited to <https://www.auctionlux.com/>). “AuctionLux Operators” refer to all parties that run AuctionLux, including but not limited to legal persons, unincorporated organizations and teams that provide AuctionLux Services and are responsible for such services. “AuctionLux” as used in this Privacy Policy includes AuctionLux Operators.

This Privacy Policy applies to all Personal Information processing activities carried out by us, across platforms, websites, and departments of AuctionLux and AuctionLux Operators.

To the extent that you are a customer or user of our services, this Privacy Policy applies together with any terms of business and other contractual documents, including but not limited to any agreements we may have with you.

### **1. What Personal Information Does AuctionLux Collect And Process?**

- Email address
- Name
- Gender
- Date of birth
- Phone number
- Home address
- Nationality
- Transaction information
- Photographic image



## 2. How Does AuctionLux Process My Personal Information?

- Transactions. We use your personal information to process your orders, and to communicate with you about orders and services.
- Communications. We use your personal information to communicate with you in relation to AuctionLux related transactions and services.
- Compliance. We collect and process identity information and sensitive personal data to comply with our Know Your Customer (“KYC”) obligations under applicable laws and regulations, and Anti-Money Laundering laws and regulations.
- Fraud Prevention. We process personal information to prevent and detect fraud and abuse to protect the security of our users and AuctionLux.
- Service Enhancements. We process personal information to improve our services and for you to have a better user experience.

## 3. Legal age for use of AuctionLux Services

AuctionLux does not allow anyone under the age of 18 to use AuctionLux Services and does not knowingly collect personal information from anyone under 18.

## 4. Sharing Of Personal Information

We may share your Personal Data with third parties (including other AuctionLux entities) if we believe that sharing your Personal Data is in accordance with, or required by, any contractual relationship with you or us, applicable law, regulation or legal process. When sharing your Personal Information with other entities, we will use our best endeavors to ensure that such entity is either subject to this information, and follows privacy practices that are at least as secure and protective as those described in this Privacy Policy.

We may also share personal information with the following persons:

- Third party service providers:** We employ other companies and individuals to perform functions on our behalf. Examples include analysing data, providing marketing assistance, processing payments, transmitting content, and assessing and managing credit risk. These third-party service providers only have access to personal information needed to perform their functions but may not use it for other purposes. Further, they must process the personal information in accordance with our contractual agreements and only as permitted by applicable data protection laws.



**b. Legal authorities:** We may be required by law or by Court to disclose certain information about you and/or any engagement we may have with you to relevant regulatory, law enforcement and/or other competent authorities. We will disclose information about you to legal authorities to the extent we are obliged to do so according to the law. We may also need to share your information in order to enforce or apply our legal rights or to prevent fraud.

**c. Business transfers:** As we continue to develop our business, we might acquire and/or sell other businesses or services. In such transactions, user data and information generally is one of the transferred business' assets but remains subject to the promises made in any pre-existing Privacy Policy (unless, of course, the user consents otherwise). Also, in the unlikely event that AuctionLux or substantially all of its assets are acquired by a third party, user data and information will be one of the assets included in the transfer.

**d. Protection of AuctionLux and others:** We release accounts and other personal information when we believe release is appropriate to comply with the law or with our regulatory obligations; enforce or apply our Terms of Use and other agreements; or protect the rights, property or safety of AuctionLux, our users or others. This includes exchanging information with other companies and organisations for fraud protection and credit risk reduction.

## 5. How Secure Is My Information?

We design our systems with your security and privacy in mind. We have security measures in place to prevent your information from being accidentally lost, used or accessed in an unauthorised manner, and from being altered or disclosed. We work to protect the security of your personal information during transmission and during storage by using encryption protocols and security software. We maintain physical, electronic, and procedural safeguards in connection with the collection, storage and disclosure of your personal information. In addition, we limit access to your personal information only to employees, agents, contractors and other third parties strictly on a need to know basis.

Our security procedures mean that we may require you to verify your identity to protect you against unauthorised access to your account information, such as passwords. We recommend using a unique password for your AuctionLux account that is not utilized for other online accounts and to sign off when you finish using a shared device.



## **6. How Long Does AuctionLux Keep My Personal Information?**

We keep your personal information to enable your continued use of AuctionLux Services, for as long as it is required in order to fulfil the relevant purposes described in this Privacy Policy, and as may be required by law such as for tax and accounting purposes, compliance with Anti-Money Laundering laws, or as otherwise communicated to you.

## **7. Notices And Revisions**

If you have any concerns about privacy at AuctionLux, please contact us, and we will try to resolve it. You also have the right to contact your local Data Protection Authority.

Our business changes regularly, and our Privacy Policy may change also. You should check our websites frequently to see recent changes. Unless stated otherwise, our current Privacy Policy applies to all information that we have about you and your account.