

ABC Live Auction Privacy Policy

1. Purposes

Through the operation of our icollector.com, liveauctionworld.com, liveauctiongroup.com, and livebiddernetwork.com websites, subsidiary brands, affiliate ABC Sites and country specific URLs (together, the “**Platforms**”), ABC Live Auction World Ltd. (“**ABC**”) collects and, in some cases, discloses information about our users to third parties. ABC is committed to protecting personal information that we collect, use and disclose in the course of providing services and to complying with all applicable privacy laws and regulatory requirements.

This privacy policy (“**Policy**”) sets out how we collect, use, disclose and manage personal information of clients and potential clients, whether that information is collected via our Platforms and through our provision of auction services (“**Services**”). Some of your personally identifiable information may be disclosed to third parties, such as participating auction houses, if you default on payment for a successful bid through any of our Platforms.

We collect information from many areas on our Platforms. These include when you register with any or all of the Platforms in order to participate in our services, submit a form or email requesting Services and the terms “we”, “us” and “our” refer to the Platforms. “Personal information” means information about an identifiable individual, including your name, user account information, billing & shipping address, payment information, and contact information (including telephone number(s) information from one of the listed dealers, galleries, or auction houses and whenever you subscribe to our newsletter, enter a competition, complete a questionnaire, leave comments in the Feedback or Contact sections which are available throughout the Platforms.

In this Policy, the terms “you”, “your” and “user(s)” refer to a visitor of the Platforms or user of the (and e-mail address).

2. Collection and Use of Personal Information

In the course of providing Services and through our Platforms, we may collect your personal information. Personal information collected by us is used only for the purposes described in this Policy, or for other purposes which are disclosed to you and to which you consent.

We collect and use personal information from users based on the information and services requested.

(a) **Examples of personal information we may collect include:**

- (i) The information you submit via a webform or e-mail requesting information from one of the listed dealers, galleries, or auction houses;
- (ii) The information you submit by subscribing to our newsletter, enter a competition, complete a questionnaire, or leave comments in the Feedback or Contact sections which are available throughout the Platforms;

- (iii) The information you used to register with any of our Platforms in order to use our Services, including your legal name, contact name, account username(s) and relevant password, billing address, shipping address, contact details such as phone numbers, email addresses, and fax number, credit card information, or other financial details for our accounts and other incidental information relating to the Services;
- (iv) The information you used to sign-up with our Platforms, including your name/display name and email (and password if NOT using Facebook/Google), are stored in our system to allow you to sign-in. No other details are pulled from Facebook/Google. When/if you participate in an auction you may be asked for additional information at that time. Information needed to bid can vary depending on the auction and is always input explicitly by you if/when you choose to do so.
- (v) The information you provide us if you apply for an employment opportunity; and
- (vi) Other information that we may collect with your consent or as permitted or required by law.

(b) **Examples of how we use personal information include:**

- (i) To establish and manage our business relationship with you, including:
 - to offer and provide auction-related services or information to you, including by sending newsletters and other general information that you have requested, including through third party marketing and email platforms;
 - to respond to your inquiries for information or other requests submitted through our Website;
 - to issue and collect accounts;
 - if you apply or inquire about an employment opportunity with us, to process and respond to your application or inquiry; and
 - as allowed or required by law;
- (ii) For other purposes, including:
 - to share information about us, our Platforms and other products and services with you;
 - to disclose to participating auction houses your identity if you default on payment for a successful bid on our platforms or attempt a fraudulent transaction, for the purpose of protecting the integrity of

the auctioneering industry in Canada and to protect auctioneers from fraudulent bids;

- for internal purposes to help us analyze, improve and tailor our platforms to meet your needs. More specifically, ABC may use your information to analyze site usage, to help in developing our marketing and public relations, and to improve the site's content, commercial offerings, layout and usability; and
- for other purposes for which you have provided your consent.

(iii) To contact you, including:

- To email you (or in rare circumstances by phone or fax) in the following circumstances: (1) To confirm your registration on our Platform(s); (2) to confirm any bids you place; (3) if you are the winner of a competition on our Platforms (4) and if a problem arises with your account; (5) to ask for specific feedback on the site; (6) to respond to a direct enquiry or suggestion from you, and (7) to contact you regarding administrative notices using your email or mailing address.
- We will use your information for a direct mailing only if you expressly give us prior permission, which will be indicated to you. If you decide you no longer want to receive such mailings, you can remove yourself by sending an email to support@icollector.com.

(c) **Consent**

By submitting personal information to us, you consent to us collecting, using, and disclosing your personal information in accordance with this policy.

If you do not consent, do not provide your personal information or, where applicable, exercise the opt-in or opt-out options offered. If you withdraw your consent to certain uses of your personal information, we may no longer be able to provide some or all of our Services. You may change or withdraw your consent at any time, subject to legal or contractual restrictions and reasonable notice, by contacting our Privacy Officer by email or one of the other means listed below under subsection 0. You may wish to have reference to Canada's Anti-Spam Legislation, which we are committed to complying with.

(d) **Accuracy of Information We Hold**

You also have the right to know what personal information we have about you and to correct any inaccuracies. We take reasonable steps to ensure your personal information is accurate for the purposes for which we use it, including to provide you

with Services. In certain circumstances, you may have additional rights, including under applicable data protection laws, to:

- request a copy of your personal information;
- request further information about how we use your personal information;
- request us to restrict our use or disclosure of your personal information;
- object to our use or disclosure of your personal information; and
- request us to delete the personal information we hold about you.

Please direct any such requests to us by email at or by one of the other means listed below. Your request will be investigated as soon as possible and you will be provided with a written response.

If there has been a change in your personal information, please inform us as soon as possible to ensure our records are up-to-date, in one of the following ways:

- (i) **Changes:** Registered Users may change their information in the following instances: If you need to change your password for any reason, please email support@icollector.com including 'Forgot Password' in the subject line. If you need to update or change your registration information, please send a request to support@icollector.com or alternatively login to our "MyAccount" section where you will find an area to update your registration.
- (ii) **Deletion:** To have your information deleted, please contact our support team (Toll-Free: 1-866-313-0123 or Phone: 604-941-2221) and request that your account is deleted. You will need to provide your username, email, and other details to confirm ownership of the account.

3. **How and When We Disclose and Share Your Personal Information**

We disclose personal information only as described in this Policy, with your consent, or as otherwise permitted or required by law. ABC discloses personal information in the following circumstances:

(a) **Live Auctions**

- (i) ABC's core business model is to provide you with live bidding access technology on auction house sales. From the platforms, we provide a link to an auction house catalog for you to register to bid, sign up for the sale of your choice, and place live or absentee bids. Registration on our platforms is necessary to perform certain functions and participate in a live auction bidding process and we may collect or track any user information as described above. However, all customer service related enquiries are handled by the our Platforms customer services team at support@icollector.com whereby personally identifying information such as

your email address may be disclosed by yourselves in order to answer your enquiry. The auction houses participating in Live Auctions will only receive personal identifying information in the following circumstances:

- (A) to complete a sale if you are the winning bidder on a lot;
- (B) if the auction house has requested ahead of time and you have agreed to register with them prior to a live sale; and
- (C) if you default on payment for a successful bid or attempt a fraudulent transaction on our Platforms. Such personally identifying information could include your name, email address, home address, phone number, fax number and credit card information.
- (D) bidder information may, under specific circumstances, share bidder details with other auction houses as a preventive measure against bidder fraud.

(b) **Absentee Bidding on Auction Catalogs**

- (i) We have designed absentee bidding on Auction Catalogs so that no personal identifying information is displayed online or is accessible to the general public. In absentee bidding, your bids are not disclosed as it is a 'closed bidding' system.
- (ii) The only time any personal identifiable information is released is when you submit an absentee bid on an item in an auction house sale. Such personally identifying information could include your name, email address, home address, phone number, fax number, credit card information, bid amount and lot number.
- (iii) We never disclose your password and you may not disclose your password to any third parties or share it with any third parties without risking compromise of your User identity.

(c) **Other circumstances**

- (i) We may also sometimes disclose our clients' personal information to third parties, including participating auction houses, foreign agents and government or regulatory agencies. Specifically, we may disclose personal information:
 - (A) to third parties, where disclosure is necessary to provide services to you, including foreign agents, individuals or organizations retained to act on your behalf, experts, consultants or as part of a proposed or actual transaction, such as a financing or other business transaction;

- (B) to our service providers and participating auction houses, inside or outside Canada, who assist us with marketing or other services, including mailing or payment processing services. We use reasonable measures to require our service providers to use your personal information only to perform the applicable services.
- (C) to auction houses in Canada, to maintain a list of individuals who have defaulted on payment for a successful bid or attempted to undertake fraudulent transactions;
- (D) to anyone who we reasonably believe is your agent;
- (E) to third parties where you have instructed us to disclose your personal information to such parties; and
- (F) where you consent or as permitted or required by law.

Please note IP addresses are not linked to any personally identified information. Further, we use credit card information only to verify your account when you register with our Platforms. It is sent over our secure server using SSL Technology, industry-wide encryption software.

ABC will only disclose personal information when required by law or in the good-faith belief that such action is necessary in order to conform to the edicts of the law or comply with a legal process served on our Platforms.

4. Where We Store Your Personal Information

Storage of personal information we collect is stored and processed by us primarily in Canada, regardless of your country of residence. We also use third party service providers, including payment processors and technology partners, to provide the infrastructure required to provide our Services. Those service providers may store and process personal information in Canada, the United States and other jurisdictions. Personal information provided to third parties outside of Canada is subject to the laws of those jurisdictions and may not be afforded the same legal protections that are available in Canada. In those cases, we will put appropriate contractual and other controls to protect your personal information, as required by applicable laws.

If you are located in the EEA, we take steps to ensure that adequate protections and appropriate safeguards are in place for your personal information that is processed or stored outside of the EEA. This may include reliance on the adequacy status of the country's data protection laws (in the case of personal information processed in Canada), the incorporation of standard data protection clauses in our agreements with third parties or reliance on an EU-US or Swiss-US Privacy Shield registration.

By providing us with your personal information, you consent to the transmission, processing and storage of your personal information in these countries.

We may retain your personal information as long as is necessary in order to manage our relationship with you (or fulfill the purposes for which it was collected), in accordance with our documented retention policy or as otherwise permitted by law. The length of time we retain personal information

varies and may extend beyond the end of your relationship with us. We will dispose of personal information where it is no longer necessary to fulfil the purposes for which the information was collected, in accordance with our documented retention policy or as required by law.

If you have bid & won items in past auctions then some of your details may need to (in-part) be retained for transactional requirements (purchases/payments/etc). Note these transactional records are only created as a result of explicit actions by you (entering bidder details for bidding-approval, bidding-on and winning items, and providing details for payments). If you default on payment for your successful bid, your name and identity will be disclosed to third party auction houses to inform them and explain the basis for the failed transaction. The disclosure of this information is done on a one-time basis by email notification.

5. Consent

It is important to us that we collect, use or disclose your personal information only where we have your consent to do so or as provided in this Policy. Depending on the sensitivity of the personal information, your consent may be express, implied or deemed. Express consent can be given electronically or in writing. Implied consent is consent that can reasonably be inferred from your action or inaction. Deemed consent is consent we assume in the event that you do not exercise an opt-out mechanism offered to you. If you choose to provide any personal information to us, we assume that you consent to the collection, use and disclosure of your personal information as outlined in this Policy.

We may also collect, use or disclose your personal information without your consent, for example, to collect a debt you owe to us or to comply with applicable laws or court orders.

We assume, unless you advise us otherwise, that by receiving a copy of this Policy or by continuing to deal with us, you have consented to the collection, use and disclosure of your personal information as explained in this Policy.

6. Collection of Non-Personal Information Through External Tools, Log Files, Cookies, and Similar Technologies

ABC automatically tracks certain information about you in the course of using our Platforms. We collect aggregate information which tells us about visitors to our platforms, but not the identity of those visitors. For example, we may collect information about the date, time and duration of visits and which pages of our Website are most commonly accessed. The purpose of collecting this aggregate information is to help us administer and improve our Platforms. We reserve the right to provide our analyses based on such anonymous and aggregated data to third parties.

In particular, our Website uses the analytical tracking tool Google Analytics, a website analysis service, which collects, records and analyzes data regarding the behaviour of visitors to websites. This may include data about which website led a user to the Website, which pages of the Website a user accessed and how often and how long a user viewed a page. Website analysis is used mainly for the optimization of use of the Website. Google Inc., of 1600 Amphitheatre Pkwy, Mountain View, CA 94043, USA, is the operator of Google Analytics.

ABC collects information via log files. This information includes the URL that you just came from and the URL you go to next, the browser you are using and your IP address. This information is gathered for system administration and to report aggregate information to our advertisers. It is common practice for most websites to collect this information automatically. We do not gather personally identifiable information from this type of user tracking.

For the purpose of advertising, visitor and user information is aggregated for reporting to advertisers and prospective partners. However, in these situations, we never disclose to these entities any information that could be used to personally identify you, such as your name, address, User ID, password, and credit card number.

When you visit our Platforms, a cookie may be placed within the memory of your internet access device. A cookie is a small amount of data that is sent to your browser from a Web server and stored on your computer's hard drive. Cookies cannot determine the identity of individual users. It is a feature of your internet browser which you can disable at any time. However, if you refuse or disable cookies, you may be limited in some areas of our Platforms or the Platforms may not function as intended.

ABC uses cookies with regards to Registration and MyAccount. No personally identifiable information is tied to our use of cookies. We may use permanent cookies or server-side artifacts to help us track use of our Website by users, including casual visitors to our Website—such as the number and frequency of visits to our pages and which parts of our Website are visited. This information provides us with constructive feedback about our Website so that we can identify the most effective areas and improve the less popular ones.

Similarly, we may also collect information regarding the type of device, your operating system, the browser you use, your internet service provider, your domain name, your internet protocol (IP) address, the date and time that you accessed our service, the website that referred you to our Website, the web pages you requested and the subject of the ads you click or scroll over, and use such information to evaluate service performance and service quality and to optimize the user's experience of our Website. To collect this information, we use cookies, web beacons and similar technologies.

As discussed above, Google Analytics uses these technologies to tailor the performance of our Platforms to each unique visitor by tracking the date and time you visit the Platform(s), which pages you visit, and whether you have visited before. Third parties have their own policies about cookie usage and information collection. We suggest that you review any such third party policies to help you understand what data this organization holds about you and what they do with it. For example, here are the links for Google Analytics' [cookie policy](#) and [privacy policy](#).

7. Legal Basis – European Economic Area

For our commercial activities in the European Economic Area (EEA), the legal basis for processing your personal information depends on the circumstances for which it was collected.

In many circumstances, we will seek consent to process your personal information for specific purposes. In those instances, we will not process your personal information other than for those

identified purposes without your prior consent or as otherwise permitted by law. However, we may also rely on one or more of the following legal bases (as applicable) to process your personal information:

- to enter into contracts and comply with our contractual commitments to you;
- to pursue our legitimate business interests, including to provide our Services to you and to manage our business relationship; and
- to protect our legal rights and interests and comply with our legal obligations.

8. Security

Security is of utmost importance to ABC. In order to demonstrate our commitment to security of your personal information we strictly limit access to any information of a private or personal nature received in the company through use of passwords and Usernames. Your Registration Information is password-protected so that only you have access to this personal information. We recommend that you do not divulge your password to anyone. We will never ask you for your password in an unsolicited phone call or in an unsolicited email.

We have implemented reasonable physical, organization and technological security processes designed to protect the personal information in our control. Technological and operational policies and procedures are in place to protect personal information from misuse, loss and unauthorized modification or disclosure.

Unfortunately, no data transmission over the Internet can be guaranteed as completely secure. While we strive to protect such information, including using a third party provider (with encryption technology) to process account payments on our Website, we cannot ensure or warrant the security of any information transmitted to us over our Website.

Links to other Websites and Responsibility for your Information

Our Platforms may contain links to the websites of other organizations which may be of interest to you. Similarly, you may be directed to the websites of other organizations to perform certain functions provided on our Platform. Moreover, any personal information disclosed online between users in areas such as communities, e-mail, and forums, can be collected and used by others. Be aware, if you post personal information online that is accessible to the public, you may receive unsolicited messages from other parties in return.

This privacy policy only covers ABC's use and disclosure of information that ABC collects from you. Please be aware, ABC's clients and third-party internet sites that are accessible through our platforms have independent privacy and data collection practices. ABC specifically disclaims any responsibility or liability for these independent policies or actions.

Changes to the Policy

We reserve the right to change this Policy at any time and will take reasonable steps to advise affected individuals of any material changes, if necessary. You should review this Policy from time to time to ensure that you are aware of and accept any changes made.

Contacting Us

If you have any questions or comments about this Policy, your information, our third-party disclosure practices or your consent choices, please contact us at Toll-Free 1-866-313-0123 or 604-941-2221.

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