

VERSION: 19th AUGUST 2022

PRIVACY POLICY

For the purpose of the data protection legislation, Sovereign Auctions Ltd (“**we**”) are a data “controller”. This policy will give you information on how we collect and process your personal data through your use of our website www.sovereignauctions.com (“**our site**”), including if you register to use our auction services. It is important that you read this Privacy Policy so you are aware of how and why we are using your data.

Please note that we reserve the right to update this Privacy Policy at any time. This version was last updated on the date set out above.

Our contact details

If you have any questions about this Privacy Policy, please contact us in the following ways:

Address:

Sovereign Auctions Ltd
The Old Boardroom
Collett Road
Ware
Hertfordshire
United Kingdom
SG12 7LR

Email: contact@sovereignauctions.com

Telephone: 01664 454 929 and 07810 090 605

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact in the first instance.

Third-party links

This website may include links to third-party websites, plug-ins and applications or store cookie files on your computer in order to deliver its service(s). Clicking on those links or enabling those connections may allow third parties to collect, store or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer different kinds of personal data about you, which we have grouped together as follows:

- **Identity Data** includes first name, last name, marital status, title, date of birth, geographical location and gender.
- **Contact Data** includes email address, postal address and telephone numbers.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

- **Profile Data** includes your username or similar identifier and password, your interests, preferences, and feedback.
- **Usage Data** includes information about how you use our website and auction services.
- **Marketing Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Communications Data** includes all communications we have with you whether by email, post, phone or otherwise.
- **Financial Data** includes bank account, payment card details, and financial status.
- **Transaction Data** includes details about payments to and from you

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to cancel a contract you have with us, but we will notify you if this is the case at the time.

How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity Data, Contact Data, Financial Data, Profile Data, Marketing Data and Transaction Data by registering as a registered user on our website, using our trading platform, and participating in our auctions.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Usage Data and Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.

A cookie is a small data file that is saved on your internet browser or computer hard drive which tracks the websites you've visited. Cookies let us recognise you the next time you visit our site. We also use cookies to measure activity on our site, which allows us to identify which areas and features of our site are most popular. This information allows us to make improvements and updates to our site, and compile statistics on website activity to improve security or reduce fraud.

Parts of our site will not function if you do not have cookies enabled. You can set your browser to refuse cookies, or to alert you when cookies are being sent. To enable or disable cookies on your browser, please consult your browser documentation or contact your software provider.

How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Please see below to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out below.

Purpose/Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
To register you as a registered user.	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to contact you with information about the auctions)
To provide our auction services to you. This includes managing payment of the transaction.	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you
To manage our relationship with you. This includes: (a) Notifying you about changes to our terms or Privacy Policy; (b) Asking you to leave a review; and (c) Answering any queries you may have.	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated, to study how users engage with our services and to deal with enquiries)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and marketing material to you and measure or understand the effectiveness of	(a) Identity (b) Contact (c) Profile (d) Usage	Necessary for our legitimate interests (to study how customers use our services, to develop them, to grow our

the advertising we serve to you.	(e) Marketing and Communications (f) Technical	business and to inform our marketing strategy)
To use data analytics to improve our website, services, and marketing.	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and communications. We have established the following personal data control mechanisms:

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us, used our services or expressed an interest in our services and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company, person or entity outside of Sovereign Auctions Ltd for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by contacting us.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of providing you with our services or experience or other transactions.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out below:

- The Chedington Court Estate who will be processing your data in order to send you direct marketing. We will not pass on your data to them unless you have expressly consented to us doing so.
- Insightful Media Ltd who will be processing your data in order to send you direct marketing. We will not pass on your data to them unless you have expressly consented to us doing so.
- Salesforce UK Limited, who provide customer relationship management platform services to us and will process your data only for the purposes of providing the services to us.
- P-Web Systems, who provides services to us for managing the trading platform for our website and will process your data only for the purposes of providing the services to us.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

International Transfers

Whenever we transfer your personal data outside the UK, we ensure a similar degree of protection is afforded to it by implementing appropriate safeguards. For more information about the appropriate safeguards we put in place, please contact us.

How do we store and retain your information?

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We will only retain your personal information for as long as is necessary to fulfil the purposes we collect it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. In order to comply with law and to ensure we have the necessary information required in order to resolve future issues that might arise, we retain all personal data for a minimum period of seven years from collection.

Your legal rights

Under data protection law, you have the following rights:

- Your right of access – You have the right to ask us for copies of your personal information.
- Your right to rectification – You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Your right to erasure – You have the right to ask us to erase your personal information in certain circumstances.
- Your right to restriction of processing – You have the right to ask us to restrict the processing of your information in certain circumstances.
- Your right to object to processing – You have the right to object to the processing of your personal data in certain circumstances.
- Your right to data portability – You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.
- You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

If you wish to exercise any of these rights, please contact us.