Richard Edmonds Auctions Ltd. Privacy Policy:

We are committed to protecting and respecting your privacy. This notice is effective from 22nd May 2018 and explains how Richard Edmonds Auctions Ltd. (us, we, our, R.E.A.L, Richard Edmonds), processes the personal data of users of our auction and valuation services and includes bidders and sellers of auction lots as well as prospective users of our services. It also explains your rights in relation to the personal data we hold about you. We may change this policy from time to time, notification will be given for any significant changes.

For the purpose of the Data Protection Act 1998 ("the Act") the data controller is Richard Edmonds Auctions Ltd, Unit H, The Old Laundry, Ivy Road, Chippenham, Wilts. SN15 1SB ("we"). All enquires concerning our use or storage of data should be sent to info@richardedmondsauctions.co.uk

We may collect and process the following data about you:

Information that you provide by filling in our forms for instance registration forms, entry forms, commission bid forms;

If you make contact with us, we may keep a record of that correspondence;

From third parties such as: other auction houses, solicitor firms, clearance companies and individuals and organisations in the auctioneering trade whom we may contact to check background details about you;

the-saleroom.com, i-bidder.com or any other live bidding service provider who provide us with the name and contact details and transaction history (in relation to activity on their sites) of individuals who register for one of our auctions (please see their privacy policies for further information).

Shipping companies whom you hire to collect items you purchased from us.

Your image, as captured by CCTV, if you attend our premises/auction venues.

Personal identification documents, including copies of government-issued identification such as passport and driving license which are required to register bidders (or when we need to verify a seller's details).

Account details and other information relating to your transactions/dealings with us and your use of our Services.

Payment details such as credit card and bank account details either as a buyer, seller or potential buyer.

Uses made of the information:

We use information held about you in the following ways:

To provide you with information, products or services that you request from us or which we feel may interest you. If you do not wish to receive such information, please let us know now or at any time in the future, and your details will be removed from our marketing list. We will not provide your personal data to third party organisations to use for their own marketing purposes;

To notify you about changes to our service;

We will not disclose your data to any third party for the purpose of direct marketing but we may from time to time provide you with information about goods and services which we feel may be of interest to you including those provided by third parties.

Legitimate interests

We may also process your personal data because it is necessary for our or a third party's legitimate interests. Our legitimate interests include our commercial interests. In this respect, we may use your personal data for the following:

To deal with any concerns or feedback you may have in the performance of the Services.

For our internal business record keeping and processes.

To seek advice on our rights and obligations, including obtaining legal advice.

To collect money owed to us or our consignors.

To carry out background and credit checks in relation to bidders and buyers.

In this respect we will provide your data to the following:

the-saleroom.com or any other such live auction sites that you have registered with for accessing our services.

Debt collection agencies.

Our professional advisors.

Your rights:

You have the right to request us not to use your details for the purpose of providing you with information about the goods and services provided by us (other than information which you have specifically requested). You can exercise that right by notifying us at Unit H, The Old Laundry, Ivy Road, Chippenham, Wiltshre, SN15 1SB or by email at info@richardedmondsauctions.co.uk

To require us to correct the personal data we hold about you if it is incorrect;

To require us to erase your personal data;

To receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller;

To object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

Our site contains links to and from our sister company The Chippenham Auction Rooms and to social media sites, including but not limited to, Facebook and Instagram. If you follow a link to their sites, please note that these sites have their own privacy policy and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these sites.

If you are disatisfied with how we are processing your personal data, you can raise a concern with the Information Commissioner. You can also find out more about your rights under data protection legislation from the Information Commissioner's Office website available at: <u>www.ico.org.uk</u>.

Our Legal obligations:

We may process your Personal Data for our compliance with our legal obligations. In this respect, we may use your Personal Data for the following:

To meet our compliance and regulatory obligations, such as our tax reporting requirements or to carry out identity checks.

To assist with investigations (including criminal investigations) carried out by competent authorities;

In this respect we will provide your data to the following:

•external auditors;

•the police and other competent authorities, including HMRC;

How long your information is kept:

We will retain your personal data for as long as we are providing you with the Services referred to in any contractual document, and for as long as is required for legal, regulatory, fraud prevention and our legitimate business purposes after the termination of your account/agreement with us, or if your application for a particular Service is declined or abandoned.

In particular:

•in relation to CCTV images taken when you attend our premises, we will retain these for a few months;

• in relation to personal data relating to the transactions you have entered into with us as part of the provision of our Services, we will retain that data for period of seven years after that transaction has concluded in case any legal claims arise out of the provision of those Services;

•we will retain your details on our marketing database until you inform us that you no longer wish to receive our marketing communications. However, where you do unsubscribe from our marketing communications we will keep your details on a suppression list to ensure that we do not send you information you have asked not to receive;

• in relation to personal data relating to the provenance of works, we may retain that data indefinitely in our legitimate interests and the legitimate interests of the wider art market in maintaining the integrity of that market.