

Privacy Notice

This privacy notice explains how Auction Technology Group (“ATG”) companies use personal data across our companies and the following websites:

- *AntiquesTradeGazette.com operated by Metropress Ltd incorporated in England and Wales*
- *AuctionMobility.com operated by Auction Mobility LLC incorporated in Delaware, USA*
- *AuctionTechnologyGroup.com operated by Metropress Ltd incorporated in England and Wales*
- *BidSpotter.co.uk in the UK operated by Metropress Ltd incorporated in England and Wales*
- *BidSpotter.com operated by Proxibid Inc incorporated in Delaware, USA*
- *i-Bidder.com in the UK operated by Metropress Ltd incorporated in England and Wales*
- *Jasper52 operated by Live Auctioneers LLC incorporated in New York, USA*
- *Liveauctioneers.com operated by Live Auctioneers LLC incorporated in New York, USA*
- *Proxibid.com operated by Proxibid, Inc. incorporated in Delaware, USA*
- *the-saleroom.com in the UK operated by Metropress Ltd incorporated in England and Wales*
- *Wavebid.com operated by Proxibid, Inc incorporated in Delaware, USA*

By creating an account on any of the websites listed above, you agree to be bound by the terms and conditions of this Privacy Policy. If you do not agree to its terms and conditions, you should not use or access our websites. By accepting the Privacy Policy, you expressly consent to our use and disclosure of your personal data in accordance with the Policy.

Auction Technology Group Germany GmbH operates as our European representative under EU GDPR.

How to contact us

We are here to help you with any questions or concerns you may have about our use of your personal data. If you require further information, wish to make a request or exercise your rights under applicable laws you can contact us as follows:

- Via the website
 - Via the contact us forms on the websites.
 - Via the messaging service on your account.
- Via phone
 - US:
 - BidSpotter.com: +1 866-597-2437
 - LiveAuctioneers: +1 888-600-2437, ext 1
 - Proxibid:+1 877-505-7770
 - Wavebid: +1 833-616-7370
 - Germany: +49 (0)40 303731800
 - UK:
 - ATG: +44 (0) 203 725 5500

- Antiques Trade Gazette: +44 (0) 20 3725 5507
- Via post
 - USA - Auction Technology Group, 10 E 38th St, Floor 4, New York, NY 10016, USA
 - Germany (EU Representative Office) - Auction Technology Group Germany GmbH, Große Bäckerstraße 9 20095, Hamburg, Germany
 - UK - Auction Technology Group, 65 Southwark Street London SE1 0HR, UK

To escalate a matter to our independent Group Data Protection Office, contact the DPO via:

- the contact us or support pages on our websites or
- email at DPO@AuctionTechnologyGroup.com

How do we use personal data?

Our use of personal data depends on which services you are using as outlined below:

If you visit our websites

If you visit our websites, we will process details of your IT device (such as your computer, phone, tablet, or other device) and website usage to help manage website security and website performance, as a reasonable and legitimate business interest.

Our websites contain links to and from other external websites, such as those of auctioneers, our partner networks, advertisers and affiliates. If you follow a link to any external websites, please note that these websites have their own processes and privacy notices and that we do not accept any responsibility or liability for these notices, for data you give to those organisations, nor for their processing. Please check their notices before you share any personal data with those websites or organisations.

Our websites also use cookies to store data on your IT device related to your use of our websites. Further details can be found on our Cookie Notice page, which can be accessed via the link at the bottom of our webpages. If you have a Facebook account, we will share your ATG account flag, so that Facebook can send you targeted marketing but only if you have opted in to this via your Facebook account. Please contact us if you want to opt out, using the details above.

If you contact us

We will use the information you provide, including your user details and contact details, to discuss the matter you have raised, as a reasonable and legitimate business interest.

If you subscribe to our communications

If you subscribe to our newsletters, promotional communications, and updates, we will process your user and contact details to provide the requested information, as a reasonable and legitimate business interest. You can unsubscribe from those communications at any time by:

- Contacting us via contact details provided on this website;
- Using the “unsubscribe” link in emails or “STOP” number in texts; or
- Updating your marketing preferences via the preference centre for your account.

If you participate in a survey, competition, loyalty reward program, webcast or promotion

We will process the data you provide for that specific activity, including user and contact details. This may include postal, telephone, email, SMS or social media communications related to that activity.

Some activities will also provide the option to opt-in to marketing updates and offers, if you provide your consent.

If you join our auction community by registering on our site

If you register on our website, we will process the personal data that is necessary for us to provide our services to you, including sign-up, identification, service updates, product updates, bidding, winning, payment, any payment defaults, shipping, feedback, legal compliance and bidder support, under our contractual obligations.

Over time, as necessary for the fulfilment of the contract, personal data will include user contact details, IT device, website usage, bid, purchase, risk and payment histories.

We may send newsletters, a timely reminder of lots, watchlists or auctions for which you have registered via SMS, in-app notifications or email, as a reasonable and legitimate business interest, so you are less likely to miss an auction. You can opt out from receiving these messages any time.

We may perform risk-based analysis of bidder data for fraud and crime prevention purposes, as a public interest, and to determine your eligibility to bid, during sign-up and once you have become a registered bidder. We may notify our business partners, such as auctioneers, of potential high-risk activities to help protect our community by detecting, investigating and preventing unusual account activities.

We contact bidders directly, via email, with communications that are necessary for contractual or legal reasons, such as operational issues, delivery information or payment updates.

Adverts that have been specifically selected for you will also be presented on other websites, such as social media websites, that you visit as a legitimate business interest. Those websites use their cookies (with your consent) or one-way-encrypted (hashed) email address to identify your account. Those websites will not have access to your auctioneer or bidder account or bidding data. You can opt out of this by changing your account setting or preferences on these websites.

We also anonymise user data, so that we can anonymously analyse aggregated customer trends and business performance over time as a legitimate business interest.

Bidding

If you register to bid in an auction via one of our websites, we will share your contact details and bid, purchase and payment histories via our website with the relevant auctioneer to enable the auctioneer to determine whether to approve you to bid in their auction.

Winning Bids

If you win a lot as a result of a bid placed via our website, we will share your contact details, purchase and payment details (using a tokenised version of your payment card) with the auctioneer for that auction, for them to fulfil the order. That auctioneer is responsible for confirming your winning bid and delivering the goods you have purchased from them. Where we are shipping the lot, we will also process your details as necessary for the delivery, including the necessary sharing of your data with shipping companies.

Those auctioneers and shipping companies will be operating as independent data controllers for the purpose of processing that data. We have no control or liability for the use of data by those companies, and their own policies and notices apply.

Any issues with the goods you have purchased must be raised directly with the auctioneer.

Payments

Where financial transactions require bank account details to be processed, we will only use those details for the purpose of agreed payments.

Payment cards services for bidders are provided by specialist third parties such as Payrix, Plug'n Pay Technologies, and Global Payments, who operate as independent data controllers. Their policies, notices and controls apply. We will retain partial information, such as a "card transaction token".

We store your Bank Account Information (including the name, routing number, account number, and current balance of your account at a financial institution from which you may make payments). We use Plaid to authenticate information regarding your account. We may use this information to execute transactions and debit your account.

Protecting Our Auction Community

We take reasonable proactive steps to help protect all parties that we work with, from illegal, unfair, or inappropriate behaviours, as a reasonable public interest.

We will monitor positive and negative account activities, including user contact details, IT device, website usage, bid, purchase and payment histories. We share such information with partners, such as auctioneers and relevant third party service providers, to help all parties manage their commercial risks and prevent fraud under our collaborative auction service.

Accounts and services may be suspended, blocked or closed where behaviours are thought by us in our sole discretion to be inappropriate or create a commercial risk. You will be notified directly of any such action, if applicable to you. To dispute an account action, contact our customer services team.

We reserve the right to take legal or debt collection actions against organisations or individuals where relevant, and will share data with necessary parties, such as law enforcement, debt collection agencies and credit bureaus, in order to do so.

White Labelled Auction Platforms

Where we are providing technological services to an auctioneer, such that you are the direct customer of the auctioneer, the auctioneer is the data controller and we are their data processor for this processing. The auctioneer is responsible for the use of your data. Any requests you wish to raise must be raised directly with the auctioneer for that auction.

Engaging as an Auctioneer or Seller

We will process contact details of the people working for auctioneer, in order to professionally engage with your organisations, for business-to-business purposes, as a legitimate business interest.

Journalism

We will publish information that we believe to be newsworthy, in relation to our business or auction industry, as a public interest. This can include names, locations, companies and auction related information.

Your rights

We respect your right to not be discriminated against by us because you exercised any of your rights under applicable data protection legislation. This means we will not, among other things, on the basis of your data subject request:

- Deny goods or services to you;
- Charge different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;
- Provide a different level or quality of goods or services to you; or
- Suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

For residents of the UK and EU - Your Legal Rights Under the General Data Protection Regulation

If we are processing your personal data, you have the right to ask that we:

- Tell you how your data is being used, including how data is processed by third parties on our behalf;
- Send you, or your nominated third party, a copy of your data;
- Stop or suspend processing of your data, or opt out of consent that you have provided, including our use of data for marketing;
- Correct or erase your data; and/or
- Explain and manually review any automated decision making or profiling of your data.

For Residents of Certain US states - Your Legal Rights Under the California Consumer Privacy Act of 2018 (“CCPA”) and other state privacy laws

If you are a California resident, you have certain rights regarding your personal data (referred to as “personal information”) under the CCPA, including the right to request that we delete or correct personal information that we have collected from you; the right to opt-out of the sale or sharing of your personal information with our service providers; the right to limit our use of your sensitive personal information; and the right not to be discriminated against for exercising your rights. These rights are subject to certain exceptions.

Under California laws, you, or your authorized agent, have the right to know what ATG collects or discloses about you, in the last 12 months, related to your account:

- The categories of personal information we have collected.
- The categories of sources from which the personal information is collected.
- The business or commercial purpose for collecting or selling personal information.
- The categories of third parties with whom we share personal information.
- The specific pieces of personal information we have collected about you.

If you would like to exercise any of the privacy rights provided to you under your applicable state law, please refer to the “How to Contact Us” section of this policy.

Responding to your requests

Before responding, we will need to take steps to verify your identity for reasons of security (e.g., confirming your information we have on file). Once your identity is verified, responses will typically be completed within one month and at no cost to you.

We will endeavour to fulfil your request, but may be subject to limitations in our responses, for legal or contractual reasons. For example, we will not delete data if there is a legal or contractual obligation for us to retain that data.

We will provide specific details of these limitations, as relevant to your request, if and when applicable.

To exercise any of the above listed rights, please contact our Customer Service teams, using the contact details provided on this website, highlighting that you are raising a [Data Subject Request](#).

If you are not happy with the way we have handled your data, you have the right to escalate the matter to our Group independent Data Protection Office (DPO@AuctionTechnologyGroup.com), to our supervisory authority (the Information Commissioner's Office at ico.org.uk) or to initiate legal action. However, if you ever have any problems, we ask that you contact our Customer Service teams first, so that we can help to resolve the issue directly, using the contact details provided above.

Data Retention

We retain data for as long as we believe is required, to fulfil the purpose that the data was collected for, or to address potential associated legal or operational matters.

Categories of Personal Data

Where categories of personal data are referenced, the following types of personal data are included.

<i>Categories of Personal Data</i>	<i>Specific Types of Personal Data Collected</i>
User details	Name (First, Last) Username and Password Passport Number and Issuing Country (Verification of auctioneer business owners) Communication preferences (e.g. marketing) Complaints, issues, queries, comments, feedback Event participation flag (e.g. surveys or competitions) Risk indicators (e.g. feedback, blocks or bans initiated by ourselves or auctioneers, payment issues, defaults, bidding issues, device issues, location issues, etc)
Contact details	Postal address Phone number Cell phone number

<i>Categories of Personal Data</i>	<i>Specific Types of Personal Data Collected</i>
	Email address
IT Device details	IP Address Login credentials Type of operating system and browser Type of device and operating system Geographical location Preferred language
Website usage details	Pages viewed Links clicked (webpages and emails) Date and time of visit Webpage performance, errors and debugging data Duration of visit
Bid details	Search criteria Items viewed Auctions Registered Items bid on, amount, date and time.
Purchase details	Product Date and time of winning bid Amount of winning bid Delivery address Auctioneer comments and feedback

Categories of Personal Data	Specific Types of Personal Data Collected
Payment details	<p>Bank account information (routing number and account number)</p> <p>Payment card information stored as a card transaction token</p> <p>Timing and status of payments</p>

We do not collect the following GDPR Special Categories of personal data about you regarding race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, genetics, biometrics, health, sex life, or sexual orientation. We also do not collect data about criminal convictions or offenses. We request that you refrain from providing such data. We may collect certain data about you that may be considered sensitive personal data in some jurisdictions for purposes described above.

Other Matters

We routinely transfer personal information to external processing organisations (Processors), who help us provide our services under written contractual agreement, such that they are only authorised to use the information for our purposes. External organisations include:

Third party service providers	What information we share
Analytics providers	Analytics information
ATG companies and auditors	Auctioneer feedback
Business service providers including insurance, IT, finance, marketing, operational and security support	Bidder account information
Credit reference agencies	Customer support information
Law enforcement agencies	Survey responses
Marketing partners and social media sites Professional service providers	Transaction details
Research companies	

We do not sell personal information or aggregated personal information. We do not permit use of our services by children under the age of 16. We do aggregate personal data for the purpose of internal management reporting.

If you do not provide personal information we ask for, it may delay or prevent us from providing associated services to you.

We only collect personal data directly from the data subject, via our electronic platforms. We do not purchase personal data from third parties.

We will share personal data with governmental or law enforcement authorities where required to do so, to comply with legal obligations or to prevent, detect, investigate or prosecute crimes, losses or damages.

We may also need to share your data with other parties, such as potential buyers of some or all of our business or during a re-structuring. We will typically anonymize information, but this may not always be possible. The recipient of the information will be bound by confidentiality obligations. If your data is transferred to a third-party organisation as a result of corporate merger or acquisition activities, this privacy notice will still apply unless a privacy notice is provided to you by the third party.

We engage third party processors, including the other ATG entities, under contractual agreement, to process data on our behalf.

Other than stated in this Privacy Notice, we will not share, trade, sell or rent data to other third parties. We do not allow our third party service providers to use your personal data for their own purposes.

Where data is transferred internationally, appropriate safeguards will be applied, such as transfers to countries approved as having adequate data protection legislation, necessity for contract, approved contractual clauses, international data transfer agreements or US data bridge registrations.

We use extensive operational, technical, physical and organisational measures to help protect personal data from unauthorised access, loss, unlawful processing, damage or destruction.

You should only share payments data via secure portals, which are directly processed by our payment providers as independent data controllers.

This privacy notice has been written with brevity and usability in mind, to help you easily understand how we use personal data. If you have any further questions or comments, or would like more detail, please contact our Customer Services team directly.

We reserve the right to update this information at any time. If we make material changes to this privacy notice, we will take reasonable steps to notify affected data subjects.

This privacy notice was last updated July 2024.