B-Stock Solutions, LLC. Privacy Policy

EFFECTIVE DATE: May 25, 2018

**INTRODUCTION**

B-Stock Solutions, LLC (“B-Stock,” “us” or “we”) is committed to protecting the privacy of our customers and end users. This Privacy and Cookie Policy (“Policy”) explains how we collect, share and use personal information collected through our corporate websites (including [www.bstocksupply.com](https://www.bstocksupply.com/), [www.bstocksupply.eu](https://www.bstocksupply.eu/), and marketplaces within the B-Stock Network) (the “Sites”) and any related B-Stock application, marketplace service or tool (collectively, the “Services”), as well as in connection with our events, sales and marketing activities. “You” or “your” means the individual using the Services and the entity which such individual represents.

If you have any questions or concerns about our use of your personal information, then please contact us using the contact details provided at the bottom of this Policy.

**ABOUT US**

B-Stock Solutions is headquartered in the United States. We provide B2B online marketplace solutions and related services that enable our customers to more easily buy and sell bulk lot liquidation inventory. Our customers include major retailers, governments and manufacturers looking to sell their inventory (“Sellers”) and companies looking to bid on and purchase that inventory (“Buyers”).

For more information about us, please see the “About Us” section of our Site at <https://bstock.com/>.

**INFORMATION THAT WE COLLECT**

The personal information that we may collect about you broadly falls into the following categories:

Information you provide us. We may collect personal information you provide to us voluntarily: for example, when you apply to create an account to access the Services, bid on or buy products sold via the Sites, subscribe to marketing communications from us, submit enquires to us and/or otherwise contact us. We may also collect personal information from you offline, such as when you attend one of our events, during phone calls with sales representatives, or when you contact customer support. The personal information that you are asked to provide, and the reasons why you are ask to provide it, will be made clear to you at the point we ask you to provide your personal information.

The information we collect may include:

* Contact and identification information, such as your first and last name, the name of the entity which you represent (if applicable), your email address, phone number, business address, fax number, business resale certificate number, and other customer information, including without limitation, the password chosen by you for access to the Services.
* Financial information, such as credit card or bank account numbers and address of the bank from which you will be wiring funds for purchases.
* Bidding, buying or selling information you provide during a transaction, or other transaction-based content that you generate or that is connected to your account as a result of a transaction you are involved in.

We do not, however, knowingly collect personal information from children under the age of thirteen.

**Information we collect automatically.** When you visit or use our Services, we automatically collect certain information from your device. In some countries, including countries in the European Economic Area, this information may be considered personal information under applicable data protection laws.

Specifically, the information we collect automatically may include information such as your IP addresses, browser and device characteristics, operating system, language preferences, referring URLs, broad geographic location (e.g. country or city-level location) and other technical information. We may also collect information about how your device has interacted with our Sites, including pages accessed and links clicked.

This information is primarily used to main the security and operation of our Services. Collecting this information also enables us to better understand the users (like you) who come to our Sites, where they come from, and what content on our Sites is of interest to them. We use this information for our internal analytics and reporting purposes and to improve the quality and relevance of our Services to users.

Some of this information may be collected using cookies and similar tracking technologies, as explained further under the heading [“Cookies and Similar Technologies”](https://bstock.com/privacy-policy/#cookies).

**Information we obtain from third party sources.** From time to time, we may receive personal information about you from third party sources (including lists from tradeshow events that you’ve registered for, and sometimes Sellers will provide B-Stock a list of buyers for their sites), but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

The types of information we collect from third parties include your first and last name, the name of the entity which you represent (if applicable), your email address, phone number, business address, fax number, business resale certificate number, and other customer information, and we use the information we receive from these third parties to access the Services, bid on or buy products sold via the Sites, subscribe to marketing communications from us, submit enquires to us and/or otherwise contact us.

**HOW WE USE YOUR INFORMATION**

We use personal information collected via our Sites for a variety of business purposes described below. If you are from the European Economic Area, we have also described the legal basis for collecting and using the personal information we collect from you.  
We normally collect personal information from you where the processing is in our legitimate business interests (“Business Purposes”), in order to enter into or perform a contract with you (“Contractual”), where we have your consent to so (“Consent”), and/or for compliance with our legal obligations (“Legal Reasons”).

We may use the personal information we collect in the following ways:

* To provide access to and use of our Services (for our Business Purposes, Contractual purposes and/or with your Consent).
* To enable us to notify you if you post the winning bid in an auction and/or confirm your purchases (for Contractual purposes and/or with your Consent).
* To respond to your requests for support or to provide you with information you have requested about B-Stock or any of our Services (for our Business Purposes, Contractual purposes and/or with your Consent).
* To provide our Sellers, service providers and/or partners with information about your winning bid and/or to confirm your purchases to entities who require such information to ensure successful fulfilment of any purchases you make through the Services (for Contractual purposes and/or with your Consent).
* To send you information about your relationship or transactions with us and other service related information, including confirmations, invoices, technical notices, updates, security alerts and support and administrative messages (for our Business Purposes, Contractual purposes and/or with your Consent).
* To communicate with you and to personalize our communications with you (for our Business Purposes and/or with your Consent). For example, we may contact you by phone or email or other means (where this in accordance with your marketing preferences) to inform you about auctions, products, services, special offers or other promotional information related to our Services that we believe will be of interest to you. For more information about managing your marketing preferences, please see the “[Your Data Protection Rights](https://bstock.com/privacy-policy/#yourdata)“
* To prevent, detect, mitigate, and investigate fraud, security breaches, potentially prohibited or illegal activities and enforce our agreements and policies (for our Business Purposes and/or Legal Reasons).
* For other Business Purposes such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to enhance, customize and improve our Services.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the “[How to contact us](https://bstock.com/privacy-policy/#contact)”.

**HOW WE RETAIN YOUR INFORMATION**

We retain your personal information for as long as it is necessary and relevant for the purposes outlined in the section above. When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from further processing until deletion is possible.

In addition, we may retain personal information from closed accounts for Legal Reasons, e.g. to comply with national laws, prevent fraud, collect any fees owed, resolve disputes, troubleshoot problems, assist with any investigation, enforce our customer agreements and take other actions permitted or required by applicable national laws.

**HOW WE SHARE YOUR INFORMATION**

We may disclose your personal information to the following categories of recipient’s parties for the following purposes:

**With Sellers:** If you are purchasing inventory through the Services, B-Stock may share such information with the Sellers from whom you bid-on or buy products via the Services, as necessary to ensure successful fulfillment of any bids and/or purchases you make via the Services.

**Service Providers:** B-Stock may use other companies to perform services on its behalf and which require access to your information to do that work. Examples include, hosting data, analysing data, providing marketing assistance, facilitating some aspects of the Services, sending e-mail, fulfilling purchase requests and providing payment processing services. These other companies may be supplied with or have access to your personal information solely for purposes that are described in this Policy or notified to you when we collect your personal information.

**B-Stock Group Companies:** We may share your information with our parent companies, subsidiaries and/or affiliates for use and processing purposes described in this Policy.

**Special Circumstances:** There may be instances when B-Stock may disclose personal information without providing you with a choice in order to protect the legal rights of its Sellers, B-Stock, or any of their affiliates, employees, agents and contractors; to protect the safety and security of visitors to our Site; to protect against fraud or for risk management purposes; or to comply with the law, governmental request, judicial proceeding or other legal process (including in response to public authorities to meet national security or law enforcement requirements).

**Business Transfers:** If B-Stock or any Seller sells all or part of its business or makes a sale or transfer of assets or is otherwise involved in a merger or business transfer, or in the unlikely event of a bankruptcy, we may transfer your personal information to a potential buyer (and its agents and advisors) in connection with that transaction.

**YOUR DATA PROTECTION RIGHTS**

You have the following data protection rights:

* If you wish to **access, correct, update** or **request deletion** of your personal information, you can do so at any time by contacting us using the contact details provided under the “How to contact us” heading below.
* In addition, if you are a resident of the European Union, you can **object to processing** of your personal information, ask us to **restrict processing** of your personal information or **request portability** of your personal information. Again, you can exercise these rights by contacting us using the contact details provided under the “How to contact us” heading below.
* You have the right to **opt-out of marketing communications** we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided under the “How to contact us” heading below.
* Similarly, if we have collected and process your personal information with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
* You have the **right to complain to a data protection authority** about our collection and use of your personal information. For more information, please contact your local data protection authority. (Contact details for data protection authorities in the European Economic Area, Switzerland and certain non-European countries (including the US and Canada) are available [here](http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm).)

We will consider and act upon any request in accordance with applicable data protection laws.

**SECURITY**

We have implemented appropriate administrative, technical, personnel and physical measures designed to protect the security of any personal information in our possession against loss, theft and unauthorized use, disclosure or modification. However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your personal information, transmission of personal information to and from our site is at your own risk. You should only access the services within a secure environment.

**INTERNATIONAL DATA TRANSFERS**

Your personal information may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country (and, in some cases, may not be as protective).

Specifically, our Site servers are located in the United States and in Germany, and our group companies and third party service providers and partners operate around the world. This means that when we collect your personal information we may process it in any of these countries.

However, we have taken appropriate safeguards to require that your personal information will remain protected in accordance with this Policy. Such measures include implementing the European Commission’s Standard Contractual Clauses for transfers of personal information between our group companies and between us and our third-party providers, which require all such recipients to protect personal information that they process from the EEA in accordance with European data protection laws.

**COOKIES AND SIMILAR TECHNOLOGIES**

We use cookies (small text files containing a string of alphanumeric characters that we put on your computer) and other similar tracking technologies (like web beacons and pixels) to collect information about the pages you view, the links you click, and other actions you take through our Services, in our Sites and within our advertising or e-mail content. We use the term “cookies” or “similar technologies” interchangeably in our policies to refer to all technologies that we may use to store data in your browser or device or that collect information or help us to identify in the manner described in this Policy.

When you visit our Sites or use our Services, we may send one or more cookies to your browser. They enable us to store information about your device that is then used for matching certain other device related information that we collect via the browser. This helps us to, amongst other thing, remember your user preferences and maximize and analyse the performance of our Services. We also use cookies to provide, enhance and personalize certain aspects of our Services. Cookies are also used for targeting purposes as described below.

Our use of these technologies fall into the following categories:

**Operationally necessary.** These are cookies that are required for the operation of our Services. For example, these cookies are required to identify irregular site behaviour, prevent fraudulent activity and improve security. They also allow users of our Services to make use of our functions such as shopping carts, saved search, or similar functions. Without these cookies, services that you have asked for cannot be provided.

**Functionality related.** These cookies allow us to offer you enhanced functionality when accessing or using our Services. This may include to remembering choices you make, such as: remembering your username, preferences and settings; remembering if reacted to something on or through the Services, so you’re not asked to do it again; remembering if you’ve used any of our Services before; restricting the number of time you are shown a particular advertisement; remembering your location; and enabling social media components like Facebook or Twitter. As described below, you may disable any of these functional cookies; but if you do so, then various functions of our Services may be unavailable to you or may not work the way you want them to.

**Performance related.** These cookies assess the performance of our Services, including as party of our analytic practices to help us understand how visitors use and interact with our Services, for instance which pages on our Sites they go to most often. These cookies also enable us to personalize content and remember your preferences (e.g., your choice of language, country, or region). These cookies help us improve the way our Sites work and provide a better, personalized user experience. Some of our performance related cookies are managed for us by third parties. However, we don’t allow the third party to use the cookies for any purpose other than those listed above.

**Advertising or targeted related.** These cookies record your visit to our Services, the pages you have visited on our Sites, and the links you have clicked. They gather information about your browsing habits and remember that you have visited a Site. We (and third-party advertising platforms or networks) may use this information to make our Services, content, and advertisements displayed on our Sites more relevant to your interests (this is sometimes called “behavioral” or “targeted” advertising). These types of cookies are also used to limit the number of times you see an advertisement as well as to help measure the effectiveness of advertising campaigns.

To find out more about interest-based ads and your choices, visit these sites: Digital Advertising Alliance, the Network Advertising Initiative, and the Interactive Advertising Bureau (IAB) Europe and these links: [http://www.allaboutcookies.org](http://www.allaboutcookies.org/) or [http://www.youronlinechoices.com](http://www.youronlinechoices.com/).

**Google Analytics**

We use Google Analytics, a web analysis-tool of Google Inc., 1600 Amphitheatre Parkway Mountain View, California, 94043, USA (“Google”). Google Analytics uses “cookies” to track visitor interactions, which are text files being saved to your computer to help us analyse visits to our Site and how our Services are used. For example, by using cookies, Google can tell us which pages our users view, which are most popular, what time of day our Sites are visited, whether visitors have been to our Sites before, what website referred the visitor to our Sites, and other similar information.

For more information about Google analytic cookies, please see Google’s help pages and privacy policy:

**How to delete and block cookies**

You can disable and/or delete cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including operationally necessary cookies), you may not be able to access all or parts of our Sites or Services. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies as soon as you visit our Services.

These settings are usually found in the “options” or “preferences” menu of your internet browser. Use the “Help” option in your Internet browser for more details. If you do not want your usage of our Services to be analyzed by Google, you can disable Google Analytics by using an add-on in your Internet browser. You can download and install the add-on at: <https://tools.google.com/dlpage/gaoptout?hl=fr>.

To find out more about cookies, visit: [http://www.allaboutcookies.org](http://www.allaboutcookies.org/)

**CHANGES TO POLICY**

We may update this Policy from time to time, and you can see when it was last updated at the top of this policy. Please try to check on this page from time to time so that you can keep up to date with any changes.

If we make any material changes, we will make every effort to post a prominent notice on the Site and/or notify you via email or notification on the Services.

**HOW TO CONTACT US**

If you have any questions, comments or concerns about our Policy, you may contact us at cs@bstock.com or by postal mail at PO Box 561, San Carlos, CA 94070.

If you are a resident in the European Economic Area, the “data controller” of your personal information is B-Stock Solutions, LLC.