#### **PRIVACY POLICY**

Understanding the importance of your data, Surplus Platform LIp establishes the utmost security measures for data protection and use your information for these clearly described purposes. This privacy policy explains which personal data we collect from our users and how we use it.

- We never request any personal information unless it is necessary for offering our services.
- We never share personal information from our users with anyone, unless we need to comply with any law or we have your express consent.
- We never use your personal information for any other purpose that those expressed in this privacy policy.

Please note that this Privacy Policy is subject to change depending on legal or own regulations. It's recommended to visit this page regularly. It will be applicable from the moment users fill any of the forms to collect personal information.

## How we collect personal data in this website

- Every time you register/sign in our website.
- When filling a contact form with your personal information.
- When participating in our direct marketing campaigns.
- When third-parties share your personal data with your authorization.
- When participating in our social networks.
- When filling a form showing interest in specific products or items.
- When requesting additional information about a product to Surplus Platform employee.
- When requesting information about a product in surplusplatform.com that you have seen in our digital marketing campaigns or ads in other platforms.

#### Information gathered by Surplus Platform Llp

When any user accesses our website, e.g. to search for products, request information about auction lots, reply to a post, subscribe or make an agreement, he/she is giving away personal information under Surplus Platform Llp responsibility. This information can include personal data such as your IP address, name, physical location, e-mail address, phone number and other information. Through the facilitation of this information, the user is agreeing on the collection, use, management and storage of that information by Surplusplatform.com as described in the present Privacy Policy.

When you register an account in surplusplatform.com, aiming to participate in offered auctions and services, this is the necessary information you are providing:

- First and Last name
- Address
- Phone number
- Email address
- Company or personal ID number
- Company name (as applicable)

All this information is stored and can be accessed only through your personal login and password.

This information is used to verify your identity, authorize your registry and contact you on matters regarding your account. Furthermore, you will receive information about auctions that could be of your interest. The mobile phone number is used to verify the identity of the natural or legal person who is proceeding with the registration. During this our contractual relationship, all email data provided by the user can be used for sending commercial communications regarding products or services related to subject with the user.

You have the chance to opt out of receiving commercial communications when registering as a user as well as every time you receive a commercial communication, always for free.

When you end up as winner of an auction and choose credit card as payment method, you will be redirected to a payment gateway, which will request the following additional information:

- Name as it appears on the credit card
- Valid credit card number
- Credit card type
- Expiration date
- Billing address
- Your credit card's security number

Surplus Platform also gets information from all the people that access our website, as well as that information obtained through cookies and other tracking technologies. If you suspect your personal information has been used for purposes other than those stated in this Privacy Policy, or if you have any doubts about how Surplus Platform Llp collects, stores, uses, or destroys your personal data, you can contact us to clarify anything you need to know.

You may deactivate or cancel your account anytime on www.surplusplatform.com

## Your data usage define

Your data is used for different purposes, as described here -

- Surplus Platform Llp collects your contact data, information about your preferences and data about the use of websites
  and communications. We can also use information about purchases or bids you make to determine those products that
  can be interesting to you and to contact you depending on your preferences.
- Surplus platform Llp can also use your personal data to develop individual user profiles through statistical processes. As a
  result of the development of profiles, you can receive customized communications related to auctioned lots of your
  interest, Newsletters and events information. Information about other lots and newsletters are only sent if you have
  agreed on it.

- For sending follow-up information about auctions you are participating in.
- For making a payment: Every time you make a purchase after being the winner of an auction / spot purchase. This information is necessary to properly manage the purchase, preparation and delivery of the invoice, collection orders and information related to the management of the bidding process.
- Complying with legal regulations: in order to comply with legal regulations about information requests from legal institutions, regulatory organizations and law enforcement departments.
- Everyone involved in the handling of data is subject to laws that apply in the country they work in and are obliged to
  comply with them. These obligations include the transmission of personal data to legal institutions, regulatory
  organizations and law enforcement departments in special circumstances. We are legally compelled to hand over this
  information to those organizations.

To manage social networks – Surplus Platform Llp is present in social networks. The handling of data about followers of surplusplatform.com official pages in social networks will be subject to this section. We will handle your data for the purpose of properly managing its presence in social data, informing about activities, products or services of surpluplatform.com. The user will have previously accepted conditions of use, privacy policy and access regulations stated by the social network. There may be also other purposes allowed by the social network.

#### Remarketing

Remarketing is a way to make users who visited our website do it again. It allows us to reach people that have previously visited surplusplatform.com and associate a specific audience to a specific message. As a user of surplusplatform.com, we inform you that we are collecting information for this remarketing function at our website. This information is collected by cookies from service providers.

- Linkedin
- Twitter
- Facebook / Instagram
- Google associated services

This type of services allow interaction with social networks and other external platforms directly from the pages of this website. Any interaction and information collected by this website will always be subject to the privacy settings of the user in each social network. In case a service for interacting with social networks is installed, there is a possibility that it collects information about web browsing even for users that are not using that service.

## Advertising through other platforms

Surplusplatform.com uses advertising platforms with the following providers to generate ads and campaigns:

- Facebook / Instagram
- Linkedin
- Twitter

Google associated services

When generating ads, the audience can be segmented by:

- Location
- Demographic data (age, gender, etc.)
- Interests (activities, hobbies, etc.)
- Their purchases on the Internet and other channels etc.

Data collected through these platforms is subject to this Privacy Policy from the moment the user leaves information at these platforms in order to join a subscription bulletin or request information about a product.

## How long your data is stored

If your data is used for different purposes which imply different storage periods, we will apply the longest storage period. Your personal data will be stored as long as the user does not request removal. In any case, we limit the access to your data to those people that need to use for their working purposes. Regarding information that is no longer necessary, either access will be limited to complying with legal obligations or they will be safely removed.

Marketing purposes: regarding the use of your information for marketing purposes, we will keep this information for that purpose during the next five years after you have authorized the receipt of communications for the last time, unless you request to be removed from them revoking the previous consent. Purposes related to the compliance with legal and regulatory obligations: specific information will be stored for as long as it is required by any applicable law (taxing, commercial, money laundering, etc.).

## **Data protection measures**

We take precautions to protect your information by several measures to ensure the safety, integrity and availability of your data. When you submit sensitive information via the website, your information is protected both online & offline. Even though it is impossible to ensure complete safety during the transmittal of data through Internet or any website against intrusions, both us and any outsourced or partner companies place all efforts to ensure physical, electronic and procedural protection measures to ensure data protection according to any applicable legal requirement.

All electronic financial transactions entered into through our website will be protected by encryption technology. You
acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the
security of data sent over the internet.

You are responsible for keeping the password you use for accessing our website confidential; we will not ask you for your password except for your login /sign in.

Amongst others, we use the following measures:

- Limiting the access to your data only to those people that must do so according to their functions and who have signed a confidentiality agreement.
- Storing sensible data (such as bank details/ credit cards) only in encoded format.
- Installing perimeter protection systems in computer structures (firewalls) to prevent unauthorized accesses.
- Monitoring regularly the access to computer systems to detect and prevent any misuse of personal information.
- Handing a manual about Use Policies and information technologies control to any employee in our organization with access to information.

In case we have given you (or you have chosen) a password for accessing specific parts of our websites or any other portal, app or service under our control, you are responsible of keeping it secret and complying with any safety processes we notify to you.

### Rights of users

You have the following rights in connection with your personal information processed by Surplus Platform Llp:

- Access you can request access to your personal information and further details about how your personal information is handled by Surplus platform Llp.
- Object— you have the right to object to our processing of your personal information for direct marketing purposes.
- Rectification you can request rectification of any incorrect personal data held about you.
- Erasure you can request erasure of any personal data where the processing is based on explicit consent.

You have a right at any time to opt-out or withdraw consent of receiving marketing from us. We will only use your personal information to send you marketing messages where we have your consent to market to you. We may market to you by electronic means (e.g. by email or text) where we have provided you with goods and services and would like to give you information about similar goods and services on the basis that we have a legitimate interest to market such goods and services to you where we think you would be interested in hearing about them. We will not do this if you have asked not to be contacted, e.g. where you have not consented or otherwise have opted out of marketing.

You can exercise any of these rights at any time by contacting our us using the contact details provided above.

### International data transfers

- The information collected by us may be stored and processed in and transferred between any of the countries in which we operate in order to enable us to use the information in accordance with this policy.
- Personal information that you publish on our website or submit for publication on our website may be available, via the internet, around the world. The usage use or misuse of such information by others can not be prevented

# Third party websites

- Our website includes hyperlinks and details of, third party websites.
- We have no control over, and are not responsible for, the privacy policies and practices of third parties.