# PRIVACY POLICY

This privacy notice ("Privacy Policy") describes for you, as a user of the website www.doreandrees.com (the "Website") and auction services available through the Website: the kinds of information that we may collect about you, when and how we use that information; how we protect it; who we disclose it to and why; and your rights to access and control our use of your information. We are committed to protecting your privacy and making it clear how we use your information.

### 1. The types of information we collect and why

- a. As a Buyer using our platform to search for Lots and bid at auction, we will collect both "personal information" and "browsing information" about you.
- b. For these purposes "personal information" means any information that enables us to determine your actual identity (such as your name or contact details). We use the term, "browsing information" to mean certain anonymous information that we collect about your use of the Website. On its own, this browsing information does not enable us to determine your actual identity.
- c. There are differences in how we treat each type of information, as further explained in this Privacy Notice.

#### 2. Personal Information

- a. We collect personal information from you if and when you register to use our service, such as your name, email address, and username and password and when you contact us (for example, through one of our online forms). We collect this personal information for client account setup, to respond to your requests and administration purposes and also to provide you with a safe, reliable and efficient service.
- b. We may also collect your name and email address when you sign up for marketing emails so that we can send you information about Dore and Rees auctions, services and events we think may interest you. However, we will contact you only in accordance with your expressed marketing preferences. Please see section 3 below for information on how to contact us to change your marketing preferences.

# 3. Browsing information

a. When you visit the Website, we collect limited browsing information about your visit. This may include information about the pages of the Website that you access, how many clicks it takes you to reach specific information, and the kinds of Lots and Services you search for and the search terms you enter.

b. It may also include information about your computer's Internet Protocol ("IP") address, as well as details about cookies served to your computer through the Website.

#### 4. IP addresses

a. An IP address is the number automatically assigned to your computer whenever you access the Internet. It is automatically transmitted to us by your computer whenever you access the Website. We use this information to help diagnose problems with our server and to administer the Website; however, this number does not enable us to determine your actual identity.

#### 5. Cookies

- a. Cookies are small text files that websites often store on computer hard drives of visitors to their websites. They are widely used in order to make websites work, or work more efficiently, as well as to provide reporting information to the owners of the website.
- b. A cookie contains a unique number, which is used to recognise your computer when a user of your computer returns to a website that it visited previously. We use cookies to enhance the online experience of our visitors and to better understand how the Website is used. Cookies may tell us, for example, whether you have visited the Website before or whether you are a new visitor.
- c. There are two broad categories of cookies 'first party cookies' and 'third party cookies'. First party cookies are cookies that are served directly by the website operator to your computer, and are used only by the website operator to recognise your computer when it revisits that website. Third party cookies are served by a service provider on behalf of the website operator, and can be used by the service provider to recognise your computer when it visits other websites. Third party cookies are most commonly used for website analytics or advertising purposes.
- d. We use the following cookies:
- i. **Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
- ii. **Analytical or performance cookies.** These allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- iii. **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by

name and remember your preferences (for example, your choice of language or region).

- iv. **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests.
- e. You have the right to choose whether or not to accept cookies. You can exercise this right by amending or setting the controls on your browser to reflect your cookie preferences. However, please note that if you choose to refuse cookies you may not be able to use the full functionality of this Website.
- f. The "help" portion of the toolbar on most Internet browsers will tell you how to change your browser cookie settings, including how to have the browser notify you when you receive a new cookie, and how to disable cookies altogether.

#### 6. How to access and control your information

- a. You have the following rights in relation to your personal information:
- i. a right of access to a copy of the information comprised in your personal data;
- ii. a right to access your personal information in machine-readable format and to request that we transfer this to a third-party data controller;
- iii. a right to object to processing that is likely to cause or is causing damage or distress;
- iv. a right in certain circumstances to have inaccurate personal data rectified, blocked, erased or destroyed;
- v. a right to object to decisions being taken by automated means;
- vi. a right to claim compensation for damages caused by a breach of data protection legislation; and
- vii. a right to lodge a complaint to the Information Commissioner's Office in respect of our use of your personal information.
- b. In addition, you have the right to instruct us not to contact you for direct marketing purposes, even if you have previously consented to receive this.
- c. You can exercise these rights by emailing enquiries@doreandrees.com
- d. If you contact us in relation to your rights, we will do our best to accommodate your request or objection. Please note, however, that not all rights are absolute. Sometimes other legal obligations or third-party rights will take precedence.

# 7. Sharing your information

## a. For your protection and ours

i. We may disclose information about you (a) if we are required to do so by law or legal process; (b) to law enforcement authorities or other government officials; (c) to contractors we use to support our business (such as the Website hosting

providers), in which case we will require such third parties to agree to treat it in accordance with our instructions and this Privacy Policy and use it for the same purposes as we do; or (d) when we believe disclosure is necessary to establish, exercise or defend our legal rights.

#### b. Business transfer

i. We reserve the right to transfer any information we have about you in the event we sell or transfer all or a portion of our business or assets. Should such a sale or transfer occur, we will use reasonable efforts to direct the transferee to use personal information you have provided to us in a manner that is consistent with this Privacy Notice.

#### c. International transfers

i. Personal information we collect from you during the course of providing our service may be transferred to our service providers that are located outside of the European Economic Area ("EEA") in Google LLC, MailChimp, Rackspace Inc. While territories outside the EEA may not have the same standards of data protection as those within the EEA, we will take such measures as are necessary to ensure that any personal information we transfer outside of the EEA is adequately protected and processed only in accordance with this Privacy Policy, including via standard contractual clauses and the EU-US Privacy Shield.4.2. For your protection and ours We may disclose information about you (a) if we are required to do so by law or legal process; (b) to law enforcement authorities or other government officials; (c) to contractors we use to support our business (such as the Website hosting providers), in which case we will require such third parties to agree to treat it in accordance with our instructions and this Privacy Policy and use it for the same purposes as we do; or (d) when we believe disclosure is necessary to establish, exercise or defend our legal rights.

## 8. How we protect your personal information

a. We want you to feel confident about using the Website to search for Lots for sale and to make enquiries, and we are committed to protecting the personal information we collect. We have implemented appropriate technical and organisational security measures to protect the personal information that you provide to us against unauthorised or unlawful processing and against accidental loss, damage or destruction.

# 9. Grounds for processing

a. Our processing of your personal information will be where: (i) it is necessary for the performance of a contract we have with you; (ii) where you have provided your consent (for example for us to use cookies); (iii) it is necessary for us to comply with legal obligations that we are under; or (iv) it is in our (or a third

party's) legitimate interests and such interests do not prejudice your rights or freedoms.

- b. Our (or a third party's) legitimate interests will include:
- i. ensuring the Website is as user-friendly as possible so our customers are encouraged to use it;
- ii. promoting our businesses to those who are likely to be interested in purchasing and/or using our services;
- iii. understanding how the Website is used to help us plan development and improvements to its functionality;
- iv. understanding and predicting supply and demand for Lots displayed on the Website and the services we provide over it;
- v. to enable us to benefit from the services and expertise of third party services providers.

#### 10. Retention

a. We will retain your personal information for the period necessary to fulfil the purposes outlined in this Privacy Notice unless a longer retention period is required or permitted by law. Accordingly, your personal information shall be maintained for up to seven years following the end of the services we provide to you / your last contact with us. This retention period may be extended if any applicable statutory or regulatory obligation requires us to hold information for a longer period.

#### 11. Links to external websites

a. The Website may contain links or references to other websites to which this Privacy Policy does not apply. We strongly encourage you to read the privacy policy of every website you visit as, once you leave the Website to visit another website, the way in which your personal information is handled will be subject to a different privacy policy.

## 12. Changes to this Privacy Notice

a. We may update this policy in the future and we will take reasonable steps to make you aware of any changes to it. We also recommend that you revisit this page regularly to keep informed of our current privacy practices.

#### 13. How to contact us

- a. If you have questions about our Privacy Notice or the privacy and security of your information, you can contact us using the following details:
- i. Email: enquiries@dphixiusauctions.com

ii. Mail: Phixius Auctions, East farm Business Park, Chitterne Road, Codford, Nr Warminster, BA12 0HN

iii. Telephone: +447533750293