

# Bonhams

## PRIVACY POLICY

BONHAMS 1793 LIMITED (Company Number: 04326560), Registered Office Address: Montpelier Galleries, Montpelier Street, London, SW7 1HH ("Bonhams" or "we/us/our") is committed to protecting and respecting your privacy.

Like most businesses, Bonhams holds and processes information about its clients and other persons who interact with us or who may be interested in any of the services we offer (together the 'Services'). This Policy sets out why we collect personal information and how we use that information. It explains the legal basis for this and the rights you have over the way your information is collected and used.

If you give us your consent to hearing from the Bonhams group, other controllers within the Bonhams group may use your personal data to contact you. A list of the controllers within the Bonhams group can be found in section 1 of this privacy policy, "Who We Are". You can unsubscribe from these communications at any time.

This Policy includes:

1. **Who we are;**
2. **The personal data we collect;**
3. **How we collect personal data;**
4. **How we use the personal data we collect/use of 'aggregated' data;**
5. **How we keep your personal data secure;**
6. **Who has access to your personal data;**
7. **Transfers of your personal data outside the UK;**
8. **How to keep your information up to date/how to contact us;**
9. **How long we retain your personal data;**
10. **Your rights;**
11. **Supplemental Privacy Notice for individuals resident in California;**
12. **Changes to this Policy.**

### 1. WHO WE ARE

**BONHAMS** is the primary Data Controller for the purposes of UK and EU Data Protection Legislation.

Several other Bonhams Group companies may also control your personal data depending on where you interact with us:

Where you interact with us in the EEA, the following companies may also control your data:

**Bonhams Credit Limited** (Company Number: 05092005), Registered Office Address: Montpelier Galleries, Montpelier Street, SW7 1HH, London.

**Bonhams GMBH** (Company Number: HRB102178), Registered Office Address: Maximilianstrasse 52, 80538 München.

**Bonhams France SAS** (Company Number: 500 772 652 RCS PARIS), Registered Office Address: 4 rue de la Paix, 75002, Paris, France.

**Bonhams (Europe) SA** (Commerce Registry Reference Number: 08615/1997), Registered Office Address: Rue Etienne-Dumont 10, 1204 Genève.

**Bonhams Auctions Ltd** (Company Number: 569475), Registered Office Address: 31 Molesworth St, Dublin 2, Ireland.

**Patina Classics Limited** (Company Number: 11281872), Registered Office Address: Montpelier Galleries, Montpelier Street, SW7 1HH, London.

**Bruun Rasmussen Kunstauktioner AS** (Company number: 25472020), Registered Office Address: Sundkrogsgade 30, 2150 Nordhavn

**Bukowski Auktioner AB** (Company number: 556434-1369), Registered Office Address: Box 1754, 111 87 Stockholm.

**Bukowski Oy Ab** (Company number: 0906523-0), Registered Office Address: Mastgatan 4-6, 00160 Helsingfors, Finland.

**Cornette St Cyr** (Company number: 443 390 869 RCS Paris), Registered Office Address: 6 Avenue Hoche, 75008 Paris, France.

**Cornette de St Cyr SA** (Company number: 0847969248), Registered Office Address: 89 Chaussee de Charleroi, 1060 Saint-Gilles, Belgium.

Where you interact with us in Monaco, the following company may also control your data:

**Bonhams SAM** (Registry of Commerce Number: 92 S 02808), Registered Office Address: Le Beau Rivage, 9 Ave d'Ostende, MC 98000, Monaco.

Where you interact with us in Asia, the following company may also control your data:

**Bonhams (Hong Kong) Limited** (Company Number: 1426522), Registered Office Address: Suite 5801, 5804-06, Central Plaza, 18 Harbour Road, Wanchai, Hong Kong.

Where you interact with us in the Americas, the following companies may also control your data:

**Bonhams & Butterfields Auctioneers Corporation** (Delaware Corporations File Number: 3002993), Registered Office Address: 160 Greentree Dr Ste 101, Dover, Kent, DE 19904.

**Skinner Auctions, LLC** (Company number: 6664926), Registered Office Address: The Corporation Trust Company, 1209 N Orange St, Wilmington, DE 19801, New Castle.

### 2. THE PERSONAL DATA WE COLLECT

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data:** includes your name, title, preferred pronoun, date of birth, gender, username or similar identifier, identification and proof of address documents, the results of identification verification checks, the nature of your connection to an organization if the consigning/buying entity is a company or trust, communications with law enforcement authorities in relation to you or your property, your interest in or possession of or ownership (historic or current) of any relevant art object or other property.
- **Contact Data:** includes billing address, delivery address, email address and telephone numbers, as well as details of any additional persons for whom copy correspondence is required.
- **Correspondence Data:** includes details of your correspondence with us.
- **Image data:** including photographs and video images (from CCTV footage).
- **Financial Data:** including bank account details (if we need to pay you) or payment card details or bank transfer receipt (where you are paying us), the results of any credit report, your occupation, your source of wealth and whether you are a Politically Exposed Person (a PEP) or a family member or close associate.
- **Transaction Data:** includes details about payments to and from you and other details of products and services you have purchased from us, details of the property to which our services relate (as well as the nature of these services), as well as details of your insurance if your property remains at your own risk during our period of possession of it.
- **Credit History Data:** details relating to your credit history.
- **Technical Data:** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

- **Profile Data:** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data:** includes information about how you use our website, products and services (including the data obtained from cookies, web logs and other similar technologies that monitor the use of the Site).
- **Marketing and Communications Preferences Data:** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

If you are a job applicant, the information you are asked to provide is as set out in the application and necessary for the purposes of our considering the application.

### 3. HOW WE COLLECT PERSONAL DATA

#### a. Directly from you

Most of the personal data we collect and process about you comes directly from you when you interact with us, for example, when you:

- visit our premises;
- attend a meeting with us and provide us with information;
- enquire about any of our services or activities;
- agree to sell your property through Bonhams or ask us to perform a valuation;
- register to bid in an auction;
- subscribe to Bonhams' catalogues, newsletters or other publications;
- opt to receive news about our services or activities;
- opt to receive news about related activities or services from The Market by Bonhams;
- post content onto our Site or social media sites;
- take part in one of our live or digital events;
- contact us in any way including online, email, phone, SMS, social media or post.

#### b. Automatic collection when you call Client Services, use our telephone bidding service, visit our premises or our website or attend a digital event.

You will be recorded during the relevant auction when you use our telephone bidding service. Any personal data collected about you by recording telephone bidding calls will be processed in accordance with this policy and only for the purposes of verifying your transaction. Your image may be collected on CCTV if you attend our premises or another location where we are holding a sale or an event. CCTV is necessary to help protect our employees, our clients and other visitors and the property that we sell. Live streaming of our auctions is carried out and your image may be captured. If you object to your image being captured, please notify Client Services.

We collect data through cookies when you interact with our website. More detail is available in our Cookies Policy. You can change your cookies setting at any time by visiting the Cookies Settings page on our website.

#### c. From other sources

We may collect personal data about you and/or property you own or wish to acquire from other sources, for example:

- where a client appoints you as their agent or in some other capacity, for example, you are their restorer or shipper;
- where a third party introduces you to us;
- when we carry out research on artworks or/the art market and you are referred to in that research;
- when your information is publicly available, for example, you are an officer or beneficial owner of a company or your personal data is available from companies that carry out personal identification checks or screening for anti-money laundering, other criminal offences, sanctions and or media coverage;
- when it is available on social media sites you use, for example, Facebook, Instagram or Twitter. Depending on your settings or the applicable privacy policies, you might give us permission to access information from those accounts or services.

#### d. When you have given other organisations permission to share your personal data with us.

For example, a business working with us or when you buy a product or service from a third-party organisation.

### 4. HOW DO WE USE YOUR INFORMATION?

We set out below the types of personal data (using the list at point 2. above) that we process, how we use it and the legal basis or bases on which we process it.

The Glossary contains more information about the legal grounds for processing.

PURPOSE/ACTIVITY	TYPE(S) OF PERSONAL DATA USED FOR THIS PURPOSE	LAWFUL BASIS FOR PROCESSING
To register you as a new customer	Identity Contact	Performance of a contract.
To provide you with requested services (including selling, bidding, valuations, storage, shipping, catalogue subscriptions).	Identity Contact Correspondence Financial Transaction	Performance of a contract. Legitimate Interests.
To manage our relationship with you, including notifying you about changes to our terms or privacy policy or asking you to leave a review or complete a survey or (if you receive direct marketing from us) buy or sell with us again.	Identity Contact Profile Marketing & Communications	Performance of a contract with you. Necessary to comply with a legal obligation. Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services).
To evidence our compliance with legal requirements, (for example, conducting customer due diligence for prevention of money- laundering purposes, payment of taxation and customs duties, and our obligation to make reasonable adjustments to accommodate a disability).	Identity Contact Transaction Credit History	Necessary to comply with a legal obligation
To create records on property in terms of authenticity, provenance, and title to prevent fraud, theft or other unlawful activities	Identity Contact	Legitimate Interests Public Interest
To keep our staff, clients and visitors, premises and property on our premises secure.	Image data	Necessary for our legitimate interests (for security reasons to protect our staff, our clients and other visitors, premises and the property on our premises safe and secure).
To provide you with details about upcoming events or types of property that might interest you, and Bonhams' wider services	identity contact marketing and communications	Legitimate interests (to inform clients of our business activities)
To monitor and protect our business and website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Identity contact technical	Legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise). Necessary to comply with a legal obligation.
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.	Identity Contact Profile Usage Marketing & Communications Technical	Legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences.	Technical Usage	Legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy).
To make suggestions and recommendations to you about goods or services that may be of interest to you and send you details about future auctions and other events.	Identity Technical Contact Usage Profile Transaction	Legitimate interests – for customers who have previously requested or received services from us - (to develop our products/services and grow our business).
To monitor your use of our services, provide staff training and improve your experience.	Correspondence	Legitimate Interests.

## USE OF AGGREGATED DATA

Where Data can be aggregated (and anonymised), we may use this for research purposes without restriction. For example, we may monitor customer traffic patterns, website and Services usage and related information to optimise users' usage of the website and Services and we may give aggregated statistics to a reputable third-party. We are entitled to do this because the resulting data will not personally identify you and will therefore no longer constitute personal data for the purposes of data protection laws.

## 5. HOW DO WE KEEP YOUR INFORMATION SECURE?

We recognise and take seriously our responsibility to protect the personal data you entrust to Bonhams from loss or misuse. We understand the importance of keeping your personal information secure and take appropriate technical and physical steps to safeguard it. Bonhams uses a variety of security technologies and organisational procedures to help protect your personal data. For example, we implement access controls, use firewalls and secure servers, and we encrypt data, such as financial information and other important data. We always ensure only authorised persons have access to your information, which means only our employees and contractors, and that everyone who has access is appropriately trained to manage your information.

We are confident that we have protections in place to keep your personal data safe. In addition, we have procedures in place in the event that we have any breaches and will notify you and our regulator of a breach where we are legally obliged to do so.

## 6. WHO HAS ACCESS TO YOUR INFORMATION?

- Your personal data will be processed by the Bonhams company that initially receives it and may also be transferred to and processed by other companies within the Bonhams group as listed at the beginning of this Policy. Bonhams uses standard contractual clauses "SCCs" to regulate the transfer and processing of data between group companies.
- We do not transfer your personal data to third parties who wish to use it for their own marketing or other purposes.
- We will only transfer your personal data to third parties where it is necessary to enable us to provide you with the services you have requested (for example, our bank, payment card system operators, shippers, warehouse operatives, insurers, experts who help us authenticate or value property, event venues, caterers, catalogue and direct marketing fulfilment and distribution). These organisations will only use the information to carry out the instructed services and on the basis, that the information is confidential and secure. Some of these organisations may be located outside the EEA or outside of the US. If you are a US based resident, please see also below.
- We may need to carry out anti-money laundering and trade sanction checks. For us to do so we may need to retain and disclose certain information about you to appropriate agencies. This is also to assist with fraud, crime prevention and detection.
- We will only disclose your personal data in response to a request from a government or law enforcement authority when we are ordered to do so by a court, after we have undertaken an internal review and concluded that the institution making the request has both complied with the correct procedure and has the right to seek disclosure, or where disclosure is necessary to protect our rights or the rights of others and is not prohibited by law.
- Third parties who provide services for us, for example our mailing houses and providers of database and marketing tools. We select our third-party service providers with care. We will provide these third parties with only the information that is necessary to provide the requested service and we will have an agreement in place that requires them to operate with the same care over data protection as we do.
- Third parties if we run an event in conjunction with them. We will let you know how your data is used when you register for any such event.
- Analytics and search engine providers that help us to improve the Site and its use.
- Third parties in connection with restructuring or reorganisation of our operations, for example if we merge with another business. In such event, we will take steps to ensure your privacy rights will be protected by the third party.

Other than this, we will not share your information with other organisations without your consent.

## 7. INTERNATIONAL TRANSFERS OF DATA EU UK BASED RESIDENTS

The information you provide to us maybe transferred to countries outside the UK and the European Economic Area (EEA) or to countries which are not subject to the same data protection regulations as apply in the UK or EEA pursuant to the GDPR. We ensure that the information transferred to such countries has equivalent protection as if it were being held under the UK Data Protection regime by requiring that any third party processing your data outside the UK/EEA benefits from an adequacy determination for GDPR purposes and/or, where appropriate, we have entered into a data processing agreement which contains Standard Contractual Clauses ('SCCs') to regulate the processing of personal data.

## 8. HOW TO KEEP YOUR INFORMATION UP TO DATE

You can notify us if your contact details change, by contacting us at [info@bonhams.com](mailto:info@bonhams.com).

Additionally, do ensure you notify us of any changes to your personal data whenever you transact with us.

## 9. HOW LONG WE KEEP YOUR INFORMATION

We will hold your personal information for as long as it is necessary to provide the relevant services, maintain business records as required under tax, legal and other regulatory requirements and protect and defend against potential legal claims. With regard to personal data relating to ownership, provenance and/or title of art objects, we will keep this data indefinitely given our legitimate business interests and also the public interest in keeping this data. Please contact us if you wish to obtain further information.

If you ask us to stop contacting you with marketing materials, we will keep a record of your contact details and limited information needed to ensure we comply with your request.

## 10. YOUR RIGHTS

We may from time to time communicate with you by email or telephone regarding our services which you have expressed an interest in, or we feel may be of interest to you, where we are permitted to do so. You can opt out of receiving these marketing materials and communications at any time by using the unsubscribe link contained in all email communications to you or contacting us at [data.protection@bonhams.com](mailto:data.protection@bonhams.com)

You can also opt-out of receiving direct marketing material from us.

You have the right to request details of the processing activities that we carry out with your personal information by making a data subject access request (DSAR). If the request is 'manifestly unfounded or excessive', or further copies are requested, the data controller may charge a reasonable administration fee. To make a request, please contact us at [data.protection@bonhams.com](mailto:data.protection@bonhams.com).

You also have the following rights:

- You also have the following rights:
- the right to access;
- the right to request rectification of information that is inaccurate or out of date;
- the right to erasure of your information (the "right to be forgotten");
- the right to restrict the way in which we are dealing with and using your information;
- the right to request that your information be provided to you in a format that is secure and suitable for re-use (the "right to portability");
- rights in relation to automated decision making and profiling including profiling for marketing purposes.

These rights are subject to certain safeguards and limits or exemptions. To exercise any of these rights, you should contact the Data Protection Officer at the above address.

If you are not happy with the way in which we have processed or dealt with your information, you can complain to the Information Commissioner's Office. Further details about how to complain can be found here.

## SPECIFIC RIGHTS FOR CALIFORNIA BASED RESIDENTS

You can find further information about California privacy law in the Supplemental privacy notice for California based residents section. If you are a California resident, you may have certain rights. This section describes your CCPA rights and explains how to exercise those rights.

You have the right to request disclosure of certain information held about you regarding the categories of personal information we have collected or disclosed about you in the last twelve months. Once the request has been verified, we will disclose:

- the categories of sources of such information;
- the business or commercial purpose for collecting your personal information;
- if we disclosed your personal information for a business purpose, identifying the personal information categories that each category of recipient obtained;
- the specific pieces of personal information we collected about you (also called a data portability request); and
- the categories of third parties with whom we shared personal information.

You also have the right to request deletion of certain personal information (and direct our service providers to delete) we have about you. Please note, we may refuse the deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide a good or goods or service that you requested, or take actions reasonably anticipated within the context of our ongoing business relationship with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

We will take reasonable steps to verify your identity before responding to a request. Verification could include collecting personal information such as Name, Address, Email address and any other information that allows us to verify the identity of the person whom personal information was collected.

You are also permitted to designate an authorized agent to submit certain requests on your behalf. In order for an authorized agent to be verified, you must provide the authorized agent with signed, written permission to make such requests or a power of attorney. We may also follow up with you to verify your identity before processing the authorized agent's request.

If you would like further information regarding your legal rights under California law or would like to exercise any of them, please contact us at [data.protection@bonhams.com](mailto:data.protection@bonhams.com).

## GLOSSARY

### Legal Grounds for Processing

#### a. Legitimate Interests

means the interest of our business, or the legitimate interest of a third party, in conducting and managing our respective business to enable us to give you the best service/ product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or otherwise required or permitted to by law).

#### b. Performance of a Contract

means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

#### c. Compliance with a Legal Obligation

means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

#### d. Public Interest

means that processing is necessary for the performance of a task carried out in the public interest.

#### e. Consent

means you have given specific consent to the processing of your personal data.

## 11. SUPPLEMENTAL NOTICE FOR CALIFORNIA RESIDENT CLIENTS

This Supplemental Privacy Notice supplements the information in our Privacy Policy above and applies solely to California residents. It applies to personal information we collect on or through the Services and through other means (such as information collected offline, in person, and over the telephone). It does not apply to personal information we collect from our employees or job applicants.

### SUMMARY OF INFORMATION WE COLLECT

California law, including the California Consumer Privacy Act 2018 and related regulations (the "CCPA"), requires us to disclose information regarding the categories of personal information that we have collected about California consumers, the categories of sources from which the information was collected, the business or commercial purposes (as those terms are defined by applicable law) for which the information was collected, and the categories of parties with whom we share personal information.

### CALIFORNIA NOTICE OF COLLECTION

We, or our service providers, have collected the below categories of information for the following business purposes in the last 12 months (as those terms are defined in applicable law):

- providing the Services (e.g., account servicing and maintenance, customer service, delivery, and communication about the Services);
- our, or our service provider's, operational purposes;
- detecting, protecting against, and prosecuting security incidents and fraudulent or illegal activity;
- bug detection and error reporting;
- customizing content that we or our service providers display on the Services;
- improving our existing Services and developing new services (e.g., by conducting research to develop new products or features);
- other uses that advance our commercial or economic interests, such as communicating with you about relevant products and services available to you from third party partners; or
- other uses about which we notify you.

Examples of these types of uses are identified below and discussed more generally in how we collect data and how do we use your information sections above. We may also use the below categories of personal information for compliance with applicable laws and regulations, and we may combine the information we collect ("aggregate") or remove pieces of information ("de-identify") to limit or prevent identification of any particular user or device.

CATEGORIES OF PERSONAL INFORMATION WE MAY COLLECT	CATEGORIES OF SOURCES	EXAMPLES OF USES	CATEGORIES OF THIRD PARTIES WITH WHICH WE MAY SHARE THAT INFORMATION
<p><b>IDENTIFIERS</b></p> <p>such as name, billing and shipping addresses, email address, billing information, any provided phone numbers, such as home or mobile, security questions and password.</p>	<p>You, if you choose to provide to us.</p> <p>Your use of our services/ automatically collected from you.</p> <p>Affiliates.</p> <p>Third parties (such as service providers and other users who, for example, may refer you to use the Services).</p> <p>Events, such as conferences.</p> <p>Public records databases.</p>	<p>Providing the Services, including registration and customer service.</p> <p>Fixing and improving the Services.</p> <p>Facilitating payment. Personalizing content and your experience.</p> <p>Our Marketing and Third- Party Marketing Purposes. Bug detection and error reporting.</p> <p>Analyzing and improving the Services.</p> <p>Security, fraud and legal compliance.</p>	<p>Affiliates.</p> <p>Service providers.</p> <p>Third parties relating to legal requests, if required by law or if we believe in good faith that it is reasonably necessary.</p> <p>Third parties for sales of transfers of our business or assets.</p>
<p><b>COMMERCIAL INFORMATION</b></p> <p>such as records of your purchases and transaction data.</p>	<p>You, if you choose to provide to us.</p> <p>Your use of our services/ automatically collected from you.</p> <p>Affiliates.</p> <p>Third parties (such as service providers).</p>	<p>Providing the Services, including registration and customer service.</p> <p>Fixing and improving the Services.</p> <p>Facilitating payment. Personalizing content and your experience.</p> <p>Our Marketing and Third- Party Purposes.</p> <p>Bug detection and error reporting.</p> <p>Analyzing and improving the Services.</p> <p>Security, fraud and legal compliance.</p>	<p>Affiliates.</p> <p>Service providers.</p> <p>Third parties relating to legal requests, if required by law or if we believe in good faith that it is reasonably necessary.</p> <p>Third parties for sales of transfers of our business or assets.</p>
<p><b>FINANCIAL DATA</b></p> <p>such as credit or debit card number, verification number, and expiration date, to process payments and information about your transactions and purchases with us.</p>	<p>You, if you choose to provide to us.</p> <p>Third parties (such as service providers and third parties confirming payments made on your behalf).</p> <p>Affiliates.</p>	<p>Providing the Services. Facilitating payment. Fixing and improving the Services.</p> <p>Analyzing use of the Service. Security, fraud and legal compliance.</p>	<p>Affiliates.</p> <p>Service providers.</p> <p>Other individuals or companies at your request.</p> <p>Third parties relating to legal requests, if required by law.</p> <p>Third parties for sales or transfers of our business or assets.</p>
<p><b>DEVICE INFORMATION AND IDENTIFIERS</b></p> <p>such as IP address; browser type and language; operating system; platform type; device type; software and hardware attributes; and unique device, advertising, and app identifiers.</p>	<p>You (through your device).</p> <p>Analytics providers. Cookies and tracking technologies.</p>	<p>Providing the Services, including registration and customer service.</p> <p>Fixing and improving the Services.</p> <p>Facilitating payment. Personalizing content and your experience.</p> <p>Our Marketing and Third- Party Marketing Purposes.</p> <p>Bug detection and error reporting.</p> <p>Analyzing and improving the Services.</p> <p>Security, fraud and legal compliance.</p>	<p>Service providers. Affiliates.</p> <p>Third parties relating to legal requests, if required by law or if we believe in good faith that it is reasonably necessary.</p> <p>Third parties for sales of transfers of our business or assets.</p>

CATEGORIES OF PERSONAL INFORMATION WE MAY COLLECT	CATEGORIES OF SOURCES	EXAMPLES OF USES	CATEGORIES OF THIRD PARTIES WITH WHICH WE MAY SHARE THAT INFORMATION
<p><b>INTERNET NETWORK AND ELECTRONIC ACTIVITY DEVICE INFORMATION</b></p> <p>such as information about files you download, domain names, landing pages, browsing activity, content viewed and clicked, dates and times of access, pages viewed, forms you complete or partially complete, uploads or downloads, whether you open an email .</p> <p><b>See “Cookies Policy above for more information about how we collect and use this nformation.</b></p>	<p>You (through your device).</p> <p>Advertising providers. Analytics providers.</p> <p>Cookies and tracking technologies.</p> <p>Marketers.</p> <p>Our affiliates.</p>	<p>Providing the Services, including registration and customer service.</p> <p>Fixing and improving the Services.</p> <p>Personalizing content and your experience.</p> <p>Our Marketing and Third- Party Marketing Purposes.</p> <p>Bug detection and error reporting.</p> <p>Analyzing and improving the Services.</p> <p>Security, fraud and legal compliance.</p>	<p>Service providers.</p> <p>Affiliates.</p> <p>Third parties relating to legal requests, if required by law or if we believe in good faith that it is reasonably necessary.</p> <p>Third parties for sales of transfers of our business or assets.</p>
<p><b>OTHER INFORMATION</b></p> <p>any other information you choose todirectly provide to us in connection with your useofthe Services.</p>	<p>You, if you choose to provide to us.</p>	<p>Providing the Services, including registration and customer service.</p> <p>Fixing and improving the Services.</p> <p>Facilitating payment.</p> <p>Personalizing content and your experience.</p> <p>Our Marketing and Third- Party Marketing Purposes. Bug detection and error reporting.</p> <p>Analyzing and improving the Services Security, fraud and legal compliance</p>	<p>Service providers.</p> <p>Affiliates.</p> <p>Third parties relating to legal requests, if required by law or if we believe in good faith that it is reasonably necessary.</p> <p>Third parties for sales of transfers of our business or assets.</p>

**METRICS**

California law may require us to compile metrics for the previous calendar year regarding consumer requests and responses. If required by applicable law, we will update this section after the CCPA has been in effect for a calendar year.

**DISCLOSURES OF PERSONAL INFORMATION FOR A BUSINESS PURPOSE**

- In the preceding twelve (12) months, Company has disclosed the following categories of personal information for a business purpose:
- Identifiers.
- California Customer Records personal information categories.
- Commercial information.
- Internet or other similar network activity.
- Geolocation data.
- Inferences drawn from other personal information.

We disclose your personal information for a business purpose to the following categories of third parties:

- Service providers.

**NON-DISCRIMINATION**

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, specifically we will not:

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

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information’s value and contain written terms that describe the program’s material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time. We do not currently offer any financial incentives.

**CALIFORNIA SHINE THE LIGHT**

California law permits users who are California residents to request and obtain from us once a year, free of charge, a list of the third parties to whom we have disclosed their ‘personal information’ (if any, and as defined under applicable California law) for their direct marketing purposes in the prior calendar year, as well as the type of personal information disclosed to those parties. If you are a California resident and would like to request this information, please submit your request in an email at data.protection@bonhams.com.

**12. CHANGES TO THIS POLICY**

California law permits users who are California residents to request and obtain from us once a year, free of charge, a list of the third parties to whom we have disclosed their ‘personal information’ (if any, and as defined under applicable California law) for their direct marketing purposes in the prior calendar year, as well as the type of personal information disclosed to those parties. If you are a California resident and would like to request this information, please submit your request in an email at data.protection@bonhams.com.

This Policy was last updated in July 2023.