

Bonhams

PRIVACY POLICY

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

This Privacy Policy applies only to the information Bonhams 1793 Limited and its Affiliates collect through the websites, mobile applications, electronic devices, digital products and services we provide, any other services that display this Privacy Policy, and all of the associated content, functionalities and advertising (collectively, the "Services"). This Privacy Policy governs the Services regardless of how you access them. Some Services may have a specific, separate privacy policy that will govern use of those Services. This Privacy Policy describes:

- the information we collect and how we collect it;
- what we do with the information we collect;
- how we share and disclose user information with third parties;
- your California Privacy Rights;
- you GDPR Individual Rights;
- how you can access and update your information;
- how we protect information;
- collection of certain information by third parties through our Services;
- how to contact us;
- changes to this Privacy Policy;
- supplemental Privacy Notice for California Residents.

This Policy sets out why we collect personal information about individuals and how we use that information. It explains the legal basis for this and the rights you have over the way your information is used. Some of this information will be collected via our website at www.bonhams.com ("Site").

WHO WE ARE

BONHAMS 1793 LIMITED, is the primary Data Controller for the purposes of 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, London, SW7 1HH

- 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

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, Monaco MC 98000

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
- Butterfields Credit Corporation, Inc. (California Corporate Number: C1176151), Registered Office Address: 580 Madison Avenue, New York, NY 1002

We may change this Policy from time to time. If we make any significant changes, we will advertise this on the Site or contact you directly with the information. Please check this page occasionally to make sure you are happy with any changes.

If you have any questions about this Policy or concerning your personal information, please contact data.protection@bonhams.com

WHAT TYPE OF PERSONAL INFORMATION DO WE COLLECT?

The type and amount of information we collect depends on why you are providing it.

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

- **Identity Data** includes first name, last name, preferred pronoun, date of birth, gender, username or similar identifier, title.
- **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 (including bidding instructions recorded online or over the telephone, and any complaints you have made to our customer services team).
- **Image data** including photographs and video images (from CCTV footage).
- **Financial Data** includes bank account, payment card details.

- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us, as well as details of your insurance if your property remains at your own risk and details of the property to which our services relate (as well as the nature of these services).
- **Credit History Data:** details relating to a customer's 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. Our recruitment privacy policy can be viewed [here](#).

HOW DO WE COLLECT INFORMATION?

We may collect information from you whenever you contact us or have any involvement with us for example when you:

- visit the Site
- enquire about our activities or services
- sign up to receive news about our activities
- create or update a profile to bid in an auction
- agree to sell your property through Bonhams or ask us to perform a valuation
- post content onto our Site or social media sites
- attend a meeting with us and provide us with information
- take part in our events
- contact us in any way including online, email, phone, SMS, social media or post

WHERE DO WE COLLECT INFORMATION FROM?

We collect information:

- (1) when you bid at an auction via telephone, call our Customer Services, visit our premises or the Site. Your voice will be recorded when you call our Customer Service team, when you use our telephone bidding service and when you telephone our business services.

- (2) when you attend our premises. We use CCTV at our auction house and offices to protect our staff, our visitors and the property that we sell. We video our auctions for security reasons and so that we may observe and retain a record of bidding practices.
- (3) from you when you give it to us directly: you may provide your details when you ask us for information, attend our events, consign property, register for auctions, place bids or contact us for any other reason. Your information may be collected by an organisation we are working with, but we are still responsible for your information.
- (4) when you give it to us indirectly: your information may be shared with us by other organisations. They should only do so in the way they have set out in their own Privacy Policy which you should check when you give your details.
- (5) when you have given other organisations permission to share it: your information may be provided to us by other organisations if you have given them your permission. This might for example be a business working with us or when you buy a product or service from a third-party organisation. The information we receive from other organisations depends on your settings or the optional responses you have given them.
- (6) when you use the Site: information about you is recorded and stored when you use the Site. See the information about the use of cookies under that heading below.
- (7) When it is available on social media: depending on your settings or the privacy policies applying for social media and messaging services you use, like Facebook, Instagram or Twitter, you might give us permission to access information from those accounts or services.

HOW DO WE USE YOUR INFORMATION?

We will use your personal information in several ways which reflect the legal basis applying to processing of your data. These may include:

- providing you with the information or services you have asked for
- sending you communications with your consent that may be of interest, including marketing information about our services and activities
- when necessary, for carrying out your obligations under any contract between us
- seeking your views on the services or activities we carry on, so that we can make improvements
- maintaining our organisational records and ensuring we know how you prefer to be contacted
- analysing the operation of the Site and analysing your website behaviour to improve the Site and its usefulness
- processing job applications

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

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

Purpose/Activity	Type of data	Lawful basis for processing including legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
(a) To provide you with requested services, such as: (a) bidding on auction items (b) selling your items at our auctions (c) restoration, (d) storage (e) expertise (f) shipping, (g) Valuations (h) catalogue subscription,	a) Identity (b) Marketing and Communications Preferences (c) Contact (d) Transaction (e) Financial (f) Correspondence	Necessary for performance of a contract or Necessary for our Legitimate Interests
To process and deliver the items you have successfully bid on;: (a) Manage payments, fees and charges	(a) Identity (b) Contact (c) Financial	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)

<p>(b) Collect and recover money owed to us</p>	<p>(d)Transaction</p> <p>(e)Marketing and Communications Preferences</p> <p>(f) Correspondence</p>	
<p>To manage our relationship with you, which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review</p>	<p>(a)Identity</p> <p>(b)Contact</p> <p>(c)Profile</p> <p>(d)Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>
<p>To evidence our compliance with legal requirements, (for example, prevention of money-laundering, payment of taxation and customs duties, conducting customer identification for purposes of knowing our customers, and our obligation to make reasonable adjustments to accommodate a disability)</p>	<p>(a)Identity</p> <p>(b)Contact</p> <p>(c)Transaction</p> <p>(d) Credit History</p>	<p>Compliance with a legal obligation.</p>
<p>Use of CCTV on to keep our staff, premises, you and property on our premises secure</p>	<p>(a) Image data</p>	<p>Necessary for our legitimate interests (for security reasons to protect our staff, our visitors and the property that we sell)</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a)Identity</p> <p>(b)Contact</p> <p>(c) Technical</p>	<p>(a) Necessary for our 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)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a)Identity</p> <p>(b)Contact</p> <p>(c)Profile</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>

	(d) Usage (e) Marketing and Communications (f) Technical	
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our 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	(a) Identity (b) Technical (c) Contact (d) Usage (e) Profile (f) Transaction	(a) Necessary for our legitimate interests – for customers who have previously requested or received services from us - (to develop our products/services and grow our business) (b) Consent (for customers who have not requested or received services yet, but who have subscribed to receive information or marketing from us at an event, online or by talking to one of our members of staff.
To monitor your use of our services, provide staff training and improve your experience	(a) 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 personal identify you and will therefore no longer constitute personal data for the purposes of data protection laws.

HOW DO WE KEEP YOUR INFORMATION SAFE?

We recognise and take seriously our responsibility to protect the personal data you entrust to Bonhams from loss or misuse.

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.

No data transmission over the internet can be guaranteed to be completely secure. So, whilst we strive to safeguard your information, we cannot guarantee the security of any information you provide online and you do this at your own risk.

We understand the importance of keeping your personal information secure and take appropriate technical and physical steps to safeguard it.

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.

No data transmission over the internet can be guaranteed to be completely secure. So, whilst we strive to safeguard your information, we cannot guarantee the security of any information you provide online and you do this at your own risk.

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 [Please insert the names and details of all the companies in the group. Bonhams uses GDPR compliant standard contractual clauses to regulate the transfer and processing of data between group companies.
- Where it is necessary to enable us to provide you with the services you have requested, we will transfer your personal data to third parties (for example: we may transfer your data to our bank, payment card system operators, shippers, warehouses, 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 below).
- We do not transfer your personal data to third parties who wish to use it for their own marketing or other purposes.
- We may need to carry out anti-money laundering and trade sanction checks and 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 when we receive a request from a government or law enforcement authority to provide your data in two situations: when we are ordered to do so by a court; or after we have undertaken an internal review and conclude that the institution making the request has both complied with the correct procedure and has the right to seek disclosure.
- Third parties who provide services for us, for example [insert details such as, collecting or processing data and sending mailings]. We select our third-party service providers with care. We provide these third parties with only the information that is necessary to provide the 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

INTERNATIONAL TRANSFERS OF DATA EU UK BASED RESIDENTS

Owing to matters such as financial or technical considerations, the information you provide to us may be transferred to countries outside the European Economic Area (EEA), which are not subject to the same data protection regulations as apply in the UK. [Explain why you may do this e.g. because it is stored on servers outside the EEA or you use suppliers based outside the EEA]. We meet our obligations under GDPR by ensuring that the information has equivalent protection as if it were being held within the EEA. We do this by ensuring that any third parties processing your data outside the EEA either benefits from an adequacy determination for GDPR purposes and/or, where appropriate, we have entered into a data processing agreement which contains model EU clauses.

We may also disclose your personal information if we are required to do so under any legal obligation and may use external data for the purposes of fraud prevention and credit risk reduction, or where doing so would not infringe your rights, but is necessary and in the public interest.

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

HOW TO KEEP YOUR INFORMATION UP TO DATE

Please would you let us know if your contact details change. You can do so by contacting us at info@bonhams.com.

HOW LONG DO WE KEEP YOUR INFORMATION FOR

We will hold your personal information for as long as it is necessary for the relevant activity. Please see our Records Retention Policy here [\[link\]](#).

Where we rely on your consent to contact you for direct marketing purposes, we will treat your consent as lasting only for as long as it is reasonable to do so. This will usually be for two years. We may periodically ask you to renew your consent.

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.

YOUR RIGHTS FOR EU/UK BASED RESIDENTS

You have the right to request details of the processing activities that we carry out with your personal information through making a subject access request. Such requests must be made in writing. If the request is 'manifestly unfounded or excessive', or, further copies are requested, the data controller may charge a reasonable administration fee. More details about how to make a request, and the procedure to be followed, can be found in our Data Protection Policy. To make a request, please contact us at data.protection@bonhams.com.

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 (known as the "right to be forgotten");
- the right to restrict the way in which we are dealing with and using your information; and
- the right to request that your information be provided to you in a format that is secure and suitable for re-use (known as 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, further details of which can be found in our Data Protection Policy. To exercise any of these rights, you should contact [JOB TITLE] 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](#).

YOUR RIGHTS FOR CALIFORNIA BASED RESIDENTS

You can find further information about California privacy law in the [Supplemental privacy notice for California 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 requested 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.

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 service that you requested, 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: (i) contact us at data.protection@bonhams.com.

Glossary

Legal Grounds for Processing

1. **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 are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [contacting us](#)
2. **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.
3. **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.
4. **Public Interest** means that processing is necessary for the performance of a task carried out in the public interest.
5. **Consent** means you have given specific consent to the processing of your personal data.

Supplemental Privacy Notice for California Residents

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 of 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
Identifiers such as name, billing and shipping addresses, email address, billing information, any provided phone numbers, such as home or mobile, security questions and password.	You, if you choose to provide to us. Your use of our services/automatically collected from you. Affiliates. Third parties (such as service providers and other users who, for example, may refer you to use the Services). Events, such as conferences. Public records databases.	Providing the Services, including registration and customer service. Fixing and improving the Services. Facilitating payment. Personalizing content and your experience. Our Marketing and Third-Party Marketing Purposes. Bug detection and error reporting. Analyzing and improving the Services. Security, fraud and legal compliance.	Affiliates. Service providers. Third parties relating to legal requests, if required by law or if we believe in good faith that it is reasonably necessary. Third parties for sales of transfers of our business or assets.

<p>Commercial information</p> <p>such as records of your purchases and transaction data.</p>	<p>You, if you choose to provide to us. Your use of our services/automatically collected from you. Affiliates. Third parties (such as service providers).</p>	<p>Providing the Services, including registration and customer service. Fixing and improving the Services. Facilitating payment. Personalizing content and your experience. Our Marketing and Third-Party Purposes. Bug detection and error reporting. Analyzing and improving the Services. Security, fraud and legal compliance.</p>	<p>Affiliates. Service providers. Third parties relating to legal requests, if required by law or if we believe in good faith that it is reasonably necessary. Third parties for sales of transfers of our business or assets.</p>
<p>Financial data</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. Third parties (such as service providers and third parties confirming payments made on your behalf). Affiliates.</p>	<p>Providing the Services. Facilitating payment. Fixing and improving the Services. Analyzing use of the Service. Security, fraud and legal compliance.</p>	<p>Affiliates. Service providers. Other individuals or companies at your request. Third parties relating to legal requests, if required by law. Third parties for sales or transfers of our business or assets.</p>
<p>Device information and identifiers</p> <p>such as IP address; browser type and language; operating system; platform type; device type; software and hardware attributes; and unique</p>	<p>You (through your device). Analytics providers. Cookies and tracking technologies.</p>	<p>Providing the Services, including registration and customer service. Fixing and improving the Services. Facilitating payment. Personalizing content and your experience. Our Marketing and Third-Party Marketing Purposes.</p>	<p>Service providers. Affiliates. Third parties relating to legal requests, if required by law or if we believe in good faith that it is reasonably necessary. Third parties for sales of transfers of our business or assets.</p>

<p>device, advertising, and app identifiers.</p>		<p>Bug detection and error reporting. Analyzing and improving the Services. Security, fraud and legal compliance.</p>	
<p>Internet network and electronic activity device information</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>See “Cookies Policy above for more information about how we collect and use this information.</p>	<p>You (through your device). Advertising providers. Analytics providers. Cookies and tracking technologies. Marketers. Our affiliates.</p>	<p>Providing the Services, including registration and customer service. Fixing and improving the Services. Personalizing content and your experience. Our Marketing and Third-Party Marketing Purposes. Bug detection and error reporting. Analyzing and improving the Services. Security, fraud and legal compliance.</p>	<p>Service providers. Affiliates. Third parties relating to legal requests, if required by law or if we believe in good faith that it is reasonably necessary. Third parties for sales of transfers of our business or assets.</p>
<p>Other information</p> <p>any other information you choose to directly provide to us in connection with your use of the Services.</p>	<p>You, if you choose to provide to us.</p>	<p>Providing the Services, including registration and customer service. Fixing and improving the Services. Facilitating payment. Personalizing content and your experience. Our Marketing and Third-</p>	<p>Service providers. Affiliates. Third parties relating to legal requests, if required by law or if we believe in good faith that it is reasonably necessary. Third parties for sales of</p>

		Party Marketing Purposes. Bug detection and error reporting. Analyzing and improving the Services Security, fraud and legal compliance.	transfers of our business or assets.
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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.
- [Category G: Geolocation data.]
- Category K: 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

Changes to this Privacy Policy

This Policy may be changed from time to time. If we make any significant changes we will advertise this on the Site or contact you directly with the information. We recommend that you read this Privacy Policy each time you consider giving your personal information to us.

This Policy was last updated in January 2020.

BONHAMS 1793 LIMITED

Version 3.00