

# PRIVACY POLICY

EFFECTIVE: August 2018

This privacy policy (this “Privacy Policy”) tells you how we use your information when you use our website(s) (the “Site”) and mobile application(s) (the “Application”) made available by Crossroads Auction House, LLC (“we,” “us” or “our”). Our Terms and Conditions of Use and Conditions of Sale are incorporated by reference.

The Site and Application allow you to, among other things use your computer or mobile device(s) to place bids and monitor live auctions (collectively, the “Services”). We are the owner of any information collected through the Site, and we act as a processor. This Privacy Policy is only applicable when users access the Site and the Application and may not be applicable to information collected in other channels (for example, valuation services, subscriptions to catalogues, telephone bid transactions, etc.).

## **What types of information does the Site and the Application collect?**

We collect and store information that you voluntarily provide to us as well as data related to your use of the Site and Application.

When you register with us and use the Services, we ask that you provide your name, email address, user name and password. You can also choose to provide us with additional information, such as a contact phone number. All of the information listed in this paragraph is collectively referred to as your “Personal Data”. This Personal Data is necessary to provide you with the Application and we are processing this Personal Data in accordance with your request.

If you choose to purchase an item at auction, your payment information is processed by a third party payment processor. Please carefully read the section titled “Processing Payments for Auction Items” below. All payment information is necessary to process for the purpose of completing the transaction that you have requested with us.

The Application can also provide you with push notifications of upcoming events, such as sales or auctions. You can opt out of receiving push notifications at any time by using the settings on your mobile device. You can stop all collection of information by the Application by uninstalling the Application. You may use the standard uninstall processes as may be available as part of your mobile device or via the mobile application marketplace or network.

In addition, we automatically collect certain information and analytical data related to your use of the Site and Application (“Usage Information”). In the aggregate, this Usage Information is non-personally identifiable or anonymous information about you, including the date and time of your visit, the phone network associated with your mobile device, your mobile device’s operating system or platform, the type of mobile device you use, your mobile device’s unique device ID, location and the features of our Application you accessed (collectively “Aggregate Information”). This Aggregate Information is in no way associated with your Personal Data. Usage Information is necessary for the operation and optimization of the Site and the Application.

## **How do you use my information, and how long do you keep it?**

We use collected information, including Personal Data, to make available and to improve our high standard of reliable services. We use such information to:

- respond to inquiries or service requests and monitor such responses;
- provide information about and market our products or services;
- enable transactions conducted between you and our Application;
- resolve problems; and
- manage the Site and Application and assess usage of the Services.

We will retain Personal Data for as long as you continue to use the Site and/or Application and as long as is necessary thereafter to meet our legal obligations. We will retain Aggregate Information for up to 24 months.

#### **How do you share my information with others?**

We do not sell or rent your Personal Data to third parties. It is used for our business purposes, including marketing purposes.

#### **Processing Payments for Auction Items**

We use third-party credit card processors to process payments for auction items that you choose to make through the Services. To make this possible, your name, billing address, credit card information, and order total are shared via secure (encrypted) means with our third-party payment processors for the sole purpose of completing your order. Please note that your credit card information (number, expiration date, security code) is stored by the third party payment processor and not us. If you would like information on our payment processors, please contact us at [eric@crossroadsauctionhouse.com](mailto:eric@crossroadsauctionhouse.com).

#### **Service Providers**

We may disclose Personal Data to our third party service providers to provide you with the Services, including our third party payment processor. We share Aggregate Information with companies that provide public relations and marketing services for us. Such information will only be shared by us to customize, measure and improve our Site, Application and Services.

#### **Legal Processes**

We may disclose information, including Personal Data, which we believe is appropriate to protect our rights, or to cooperate in investigations of fraud or other illegal or inappropriate activity or in response to a subpoena, court order or other comparable legal process. If a subpoena seeks information about an identified user or limited group of users, we'll make reasonable business efforts, if permitted, to contact the user(s) before providing information to the party that requests it. We cannot guarantee that we will be able to contact the user(s) in all cases.

We may disclose Personal Data to your agent or legal representative (such as the holder of a power of attorney that you grant, or a guardian appointed for you) and may request identity verification before disclosing Personal Data in such a case.

As with any other business, it is possible that in the future we could merge with or be purchased by another company. If we are acquired, the company that acquires us would have access to the information maintained by us, including Personal Data, but would continue to be bound by this Privacy Policy unless and until it is amended.

### **Aggregate Information**

We are not limited in our use of Aggregate Information that does not permit direct association with any specific individual, or non-identifiable aggregate information about our users (such as the number of users of our Services, the geographic distribution of our users, the amount of information located and/or removed, etc.).

### **How do I change, delete or access my Personal Data?**

You may view, change, or access your Personal Data at any time by logging into the Services and changing your account information. If you'd like to delete your Individual Information that you have provided in connection with the Services, please contact us at [eric@crossroadsauctionhouse.com](mailto:eric@crossroadsauctionhouse.com).

### **How do the Services use cookies or other technologies?**

We collect certain information about your mobile device automatically, such as the type of mobile device you use, your mobile device's unique device ID, the Internet Protocol (IP) address of your mobile device, your mobile device operating system, location, the type of mobile device Internet browser you use, and information about the way you use the Application. If you prefer, you can program your mobile device so that it does not store this information while utilizing the Applications. Certain Application features may only be available through the collection and use of this type of "cache data". We may use cache data to assist in data collection and to track Application usage and trends to help us better serve you.

We may use third party analytics services on our website, such as Google Analytics. The information collected through these means (including IP address) is disclosed to these service providers, who use the information to analyze use of our website. To disable Google Analytics, please download the browser add-on for the deactivation of Google Analytics provided by Google at [Google Analytics Guide](#). We use this information only to improve the Services, but do not combine it with personally identifiable information. See our [Cookie Policy](#) for further information on our use of cookies.

### **How do you protect my information?**

We have implemented industry standard information security practices including administrative, physical, and technical measures to protect your Personal Data from loss, misuse, or unauthorized access, disclosure, alteration, or destruction. The security of your account relies on your protection of your password and mobile device(s). You are responsible for maintaining the security of your password. You are solely responsible for any and all activities that occur under your account or on your mobile device. You may not share your password or Services account with anyone. We will never ask you to send your password or other sensitive information to us in an email, though we may ask you to enter this type of information on the Site or the Application interface. If you believe someone else has obtained access to your password, please change it immediately. If you believe that an unauthorized access has already occurred please report it immediately at [eric@crossroadsauctionhouse.com](mailto:eric@crossroadsauctionhouse.com). You must promptly notify us if you become aware that any information provided by or submitted to in connection with the Services is lost, stolen, or used without permission.

If you have general concerns or questions regarding the security of information collected, processed or stored by the Site and/or Application, you can contact us at [eric@crossroadsauctionhouse.com](mailto:eric@crossroadsauctionhouse.com).

**Effective Date; Policy Changes**

Each time you use the Services, the current version of the Policy will apply. Accordingly, when you use the Services, you should check the date of this Policy (which appears at the top of the Policy) and review any changes since the last version. Our business changes frequently and this Policy is subject to change from time to time. Unless stated otherwise, our current Policy applies to all information that we have about you. We will not materially change our policies and practices to make them less protective of Personal Data collected in the past without the consent of affected customers.

**Notice to California Residents**

California Civil Code Section 1798.83 permits customers who are California residents and who have provided us with “personal information” (as that term is defined in Section 1798.83) to request certain information about the disclosure of that information to third parties for their direct marketing purposes.

If you are a California resident with questions regarding this, please contact us via email at [eric@crossroadsauctionhouse.com](mailto:eric@crossroadsauctionhouse.com) or by mail at:

Crossroads Auction House, LLC  
230 Hamer Rd  
Owens Cross Roads, AL 35763.