

ЗАТВЕРДЖЕНО
Наказом директора ТОВ «Аукціонний дім
«Голденс» №08/23-Н від 21 листопада 2023 року
_____ /Михайло ВАСИЛЕНКО/

Privacy Policy

LLC AH GOLDENS

Last updated: November 21, 2023

This privacy policy for Limited Liability Company AUCTION HOUSE GOLDENS ('Company', 'we', 'us', or 'our') describes how and why we might collect, store, use, and/or share ('process') your information when you use our services ('Services'), such as when you:

- Visit our website at <https://gs-art.store/> or any website of ours that links to this privacy policy
- Engage with us in other related ways, including any sales, marketing, or events

Questions or concerns? Reading this privacy policy will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please get in touch with us at contact@gs-art.com.

Table of Contents

<u>Summary Of Key Points</u>	<u>2</u>
<u>1. What Information Do We Collect?.....</u>	<u>3</u>
<u>2. How Do We Process Your Information?.....</u>	<u>6</u>
<u>3. What Legal Grounds Do We Rely On While Processing Your Data?.....</u>	<u>6</u>
<u>4. How Do We Share Your Information?</u>	<u>7</u>
<u>5. Is Your Information Transferred To Other Countries?</u>	<u>8</u>
<u>6. How Long Do We Store Your Information?.....</u>	<u>8</u>
<u>7. How Do We Keep Your Information Safe?</u>	<u>8</u>
<u>8. What Are Your Privacy Rights?</u>	<u>9</u>

<u>9. Updates To The Policy</u>	<u>10</u>
<u>10. How Can You Contact Us?</u>	<u>11</u>
<u>11. How To Review, Update Or Delete The Data We Collect?</u>	<u>11</u>

Summary of key points

This summary provides key points from our privacy policy. However, you can find out more details about any of these topics by clicking the link following each key point or by using our table of contents above to find the section you are looking for.

What personal information do we process? When you visit, use, or navigate our Services, we may process personal information depending on how you interact with LLC AH GOLDENS and the Services, the choices you make, and the products and features you use.

Do we process any sensitive personal information? We do not process sensitive personal information.

Do we receive any information from third parties? We may receive information from public databases, marketing partners, social media platforms, and other outside sources.

How do we process your information? We process your information to provide, improve, and administer our Services, communicate with you for security and fraud prevention, and to comply with the law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so.

In what situations and with which parties do we share personal information? We may share information in specific situations and with specific third parties.

How do we keep your information safe? We have organisational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information.

What are your rights? Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information.

How do you exercise your rights? The easiest way to exercise your rights is by contacting us. We will consider and act upon any request in accordance with applicable data protection laws.

1. What information do we collect?

In Short: We collect personal information that you provide to us.

We collect personal information that you voluntarily provide to us when you register on the Services, express an interest in obtaining information about us or our products and Services, when participate in activities on the Services, or otherwise when you contact us.

Personal Information Provided by You. The personal information we collect depends on the context of your interactions with the Services and us, your choices, and the products and features you use.

The personal information we collect at the registration stage may include the following:

- First and last name;
- Address of registration;
- Contact number;
- Email.

The personal information we collect at the stage of purchasing works may include the following:

- Country, postal code (if any), city, street, house, and apartment;
- Last name, first name, and phone number;
- Recipient's data: Full name and phone number (if the recipient is someone other than the buyer);
- Debit or credit card information (if paying online).

The personal information we collect at the stage of purchasing works without registration may include the following:

- Last name, first name and patronymic;
- Contact number;
- Email;
- Country, postal code (if any), city, street, house and apartment;
- Recipient's data: Full name and phone number (if the recipient is someone other than the buyer);
- Debit or credit card information (if paying online).

Personal information we collect at the stage of filling out the "Interested in" form:

- Last name, first name and patronymic;
- Contact number;
- Email.

Personal information that we collect when you fill out the "Ask a Question" form:

- Last name, first name and patronymic;
- Contact number;
- Email.

Personal information we collect at the stage of filling out the "Send details and images" form:

- Last name, first name and patronymic;
- Contact number;
- Email.

Personal information we collect when you fill out the "Become a Partner" form:

- Name of the company/organization;
- Brief description of the company/organization;
- Website of the company/organization;
- Contact person (last name, first name, patronymic);
- Contact details (phone, email).

Personal information we collect at the stage of filling out the form "Application for selection of works of art":

- Last name, first name and patronymic;
- Contact number;
- Email.

Personal information we collect at the stage of filling out the form "Join the Goldens team":

- Last name, first name and patronymic;
- Contact number;
- Email;
- Resume.

We do not collect or process sensitive information.

Payment Data. We may collect data necessary to process your payment if you make purchases, such as your payment instrument number and the security code associated with your payment instrument. All payment data is stored by Financial Company Elayens LLC (www.fondy.ua). You may find their privacy policy link here: <https://fondy.ua/uk/legal/privacy-policy/>.

All personal information you provide must be true, complete, and accurate, and you must notify us of any changes to such personal information.

Information that is collected automatically.

In Short: Some information – such as your Internet Protocol (IP) address and/or browser and device characteristics - is collected automatically when you visit our Services.

We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your Name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services, and other technical information. This information is primarily needed to maintain the security and operation of our Services and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies. You can find out more about this in our Cookie Policy: <https://en.gs-art.store/about/umovy-ta-polityky/>

The information we collect includes the following:

- **Log and Usage Data.** Log and usage data is service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Services, which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type, and settings and information about your activity in the Services (such as the date/time stamps associated with your usage, pages and files viewed, searches, and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called 'crash dumps'), and hardware settings). Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration information.

Information collected from other sources.

In Short: We may collect limited data from public databases, marketing partners, and other outside sources.

In order to enhance our ability to provide relevant marketing, offers, and services to you and update our records, we may obtain information about you from other sources, such as public

databases, joint marketing partners, affiliate programs, data providers, and from other third parties. This information includes mailing addresses, email addresses, phone numbers, intent data (or user behaviour data), Internet Protocol (IP) addresses, social media profiles, social media URLs, and custom profiles for purposes of targeted advertising and event promotion.

2. How do we process your information?

In Short: We process your information to provide, improve, and administer our Services, communicate with you for security and fraud prevention, and to comply with the law. We may also process your information for other purposes with your consent.

We process your personal information for a variety of reasons, depending on how you interact with our Services, including:

- To facilitate account creation and authentication and otherwise manage user accounts. We may process your information so you can create and log in to your account, as well as keep your account in working order.
- To deliver and facilitate the delivery of services to the user. We may process your information to provide you with the requested service.
- To respond to user inquiries/offer support to users. We may process your information to respond to your inquiries and solve any potential issues you might have with the requested service.
- To send administrative information to you. We may process your information to send you details about our products and services, changes to our terms and policies, and other similar information.
- To fulfil and manage your orders. We may process your information to fulfil and manage your orders, payments, returns, and exchanges made through the Services.
- To save or protect an individual's vital interest. We may process your information when necessary to save or protect an individual's vital interest, such as to prevent harm.

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records.

3. What legal grounds do we rely on while processing your data?

In Short: We only process your personal information when we believe it is necessary and we have a valid legal reason (i.e. legal basis) to do so under applicable law, like with your

consent, to comply with laws, to provide you with services to enter into or fulfil our contractual obligations, to protect your rights, or to fulfil our legitimate business interests.

This section applies to you if you are in the EU or the UK.

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information:

- **Consent.** We may process your information if you have given us permission (i.e. consent) to use your personal information for a specific purpose. You can withdraw your consent at any time. [Click here to learn more.](#)
- **Performance of a Contract.** We may process your personal information when we believe it is necessary to fulfil our contractual obligations to you, including providing our Services or at your request prior to entering into a contract with you.
- **Legal Obligations.** We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.
- **Vital Interests.** We may process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as in situations involving potential threats to the safety of any person.

In legal terms, we are generally the 'data controller' under European data protection laws of the personal information described in this privacy policy, since we determine the means and/or purposes of the data processing we perform. This privacy policy does not apply to the personal information we process as a 'data processor' on behalf of our customers. In those situations, the customer to whom we provide services to and with whom we have entered into a data processing agreement is the 'data controller' responsible for your personal information. We merely process your information on their behalf per your instructions. If you want to know more about our customers' privacy practices, you should read their privacy policies and direct any questions you have to them.

4. How do we share your information?

In Short: We may share information in specific situations described in this section and/or with the following third parties.

We may need to share your personal information in the following situations:

- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

- **Affiliates.** We may share your information with our affiliates, in which case we will require those affiliates to honour this privacy policy. Affiliates include our parent company and any subsidiaries, joint venture partners, or other companies that we control or are under common control.

5. Is your information transferred to other countries?

In Short: We may transfer, store, and process your information in countries other than your own.

Our facilities are located in Ukraine. If you are accessing our Services from outside Ukraine, please be aware that your information may be transferred to, stored, and processed by us in our facilities and by those third parties with whom we may share your personal information in Ukraine and other countries.

If you are a resident of the European Economic Area (EEA) or the United Kingdom (UK), then these countries may not necessarily have data protection laws or other similar laws as comprehensive as those in your country. However, we will take all necessary measures to protect your personal information in accordance with this privacy policy and applicable law.

6. How long do we store your information?

In Short: We keep your information for as long as necessary to fulfil the purposes outlined in this privacy policy unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy policy unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). No purpose in this policy will require us to keep your personal information for longer than twelve (12) months past the termination of the user's account.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

7. How do we keep your information safe?

In Short: We aim to protect your personal information through a system of organisational and technical security measures.

We have implemented appropriate and reasonable technical and organisational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, the transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

8. What are your privacy rights?

In Short: In some regions, such as the European Economic Area (EEA) and the United Kingdom (UK), you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time.

You have certain rights under applicable data protection laws in some regions (like the EEA and UK). These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv), if applicable, to data portability. In certain circumstances, you may also have the right to object to processing your personal information. You can make such a request by contacting us using the contact details provided in the section 'How can you contact us?' below. We will consider and act upon any request in accordance with applicable data protection laws.

If you are located in the EEA or UK, and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: <https://ec.europa.eu/justice/data-protection/bodies/authorities/index.htm>.

If you are located in Switzerland, the contact details for the data protection authorities are available here: <https://www.edoeb.admin.ch/edoeb/en/home.html>.

Withdrawing your consent: If we are relying on your consent to process your personal information, which may be express and/or implied consent, depending on the applicable law, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us by using the contact details provided in the section 'How can you contact us?' below or by updating your preferences.

Please note that this will not affect the lawfulness of the processing before its withdrawal nor, when applicable law allows, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

Opting out of marketing and promotional communications: You can unsubscribe from our marketing and promotional communications at any time by clicking on the unsubscribe link in the emails that we send, or by contacting us using the details provided in the section 'How can you contact us?' below. You will then be removed from the marketing lists.

However, we may still communicate with you - for example, to send you service-related messages that are necessary for the administration and use of your account, to respond to service requests, or for other non-marketing purposes.

Account information: If you would at any time like to review or change the information in your account or terminate your account, you can:

- Log in to your account settings and update your user account.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our legal terms and/or comply with applicable legal requirements.

Cookies and similar technologies: Most Web browsers are set to accept cookies by default. If you prefer, you can usually set your browser to remove and reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Services. Please see our Cookie Policy: <https://en.gs-art.store/about/umovy-ta-polityky/> for further information.

If you have questions or comments about your privacy rights, you may email us at contact@gs-art.com.

9. Updates to the Policy

We may update this privacy policy from time to time. The updated version will be indicated by an updated 'Last Updated' date, and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy policy, we may notify you either by prominently posting a policy of such changes or by directly sending you a notification. We encourage you to review this privacy policy frequently to be informed of how we are protecting your information.

10. How can you contact us?

If you have questions or comments about this policy, you may email us at contact@gs-art.com.

11. How to review, update or delete the data we collect?

We provide the right to request access to the personal information we collect from you, change that information, or delete it unless it does not contradict any applicable laws.

To request to review, update, or delete your personal information, please email us at contact@gs-art.com.