

Privacy Policy Statement

Effective Date: 12:01 AM CST, USA, October 27, 2014

PLEASE READ THE FOLLOWING CAREFULLY BEFORE ACCESSING ANY PART OF THE WEBSITE.

This Privacy Policy applies to all of the products, services and websites offered by Palatium Auctions®, its parent companies, subsidiaries and affiliated companies (collectively hereinafter, the “Services”).

If you have any questions about this Privacy Policy, please feel free to contact us through our website or write to us:

Privacy Matters
c/o Palatium Auctions®
304 South 52nd Street
Belleville, Illinois 62226
USA

Information We Collect and How We Use It

We offer a number of Services that do not require you to register for an account or provide any personal information to us, such as reviewing our upcoming and past auctions. In order to provide our full range of Services, we may collect the following types of information:

- **Information you provide** – When you sign up for an account with Palatium Auctions® or other Palatium Auctions® service or promotion for Services that require registration, we ask you for personal information (such as your name, email address and an account password). For certain Services, such as bidding in auctions, we also request credit card or other payment account information which we maintain in encrypted form on secure servers. We may combine the information you submit under your account with information from other Services or third parties in order to provide you with a better experience and to improve the quality of our Services.
- **Cookies** – When you visit Palatium Auction®’s websites, we send one or more cookies – a small file containing a string of characters – to your computer or other device that uniquely identifies your browser. We use cookies to improve the quality of our Services, including for storing user preferences and tracking user trends. We may set one or more cookies in your browser when you visit a Palatium Auctions® website.
- **Log information** – When you access the Services, our servers automatically record information that your browser sends whenever you visit a website. These server logs may include information such as your web request, Internet Protocol address, browser type, browser language, the date and time of your request and one or more cookies that may uniquely identify your browser.
- **User communications** – When you send email or other communications to Palatium Auctions®, we may retain those communications in order to process your inquiries, respond to your requests and improve our Services.
- **Links** – Palatium Auctions® may present links in a format that enables us to keep track of whether these links have been followed. We use this information to improve the quality of our Services, search technology, customized content and advertising.

- **Other sites** – This Privacy Policy applies to the Services only. We do not exercise control over the sites displayed as links from within our various websites. Other websites may place their own cookies or other files on your computer, collect data or solicit personal information from you. From time to time, our website may provide links to other websites, not owned or controlled by Palatium Auctions®, that we think might be useful or of interest to you. We cannot, however, be responsible for the privacy practices used by other website owners or the content or accuracy of those other websites. Links to various websites that are not owned or operated by Palatium Auctions® do not constitute or imply endorsement by Palatium Auctions® of these websites, any products or services described on these sites, or of any other material contained in them. We may also provide links to other websites that are controlled by Palatium Auctions®, its parent companies, subsidiaries and affiliated companies, but that operate independently of this website. Privacy policies applicable to those sites will appear on those sites and may differ from this Privacy Statement.

Palatium Auctions® only processes personal information for the purposes described in this Privacy Policy. In addition to the above, such purposes include:

- Verifying your identity so that we can be sure that all of our communications with you are secure and confidential;
- Responding to inquiries or requests from you;
- Providing our Services, including the display of customized content;
- Communicating service updates, offers and promotions;
- Auditing, research and analysis in order to maintain, protect and improve our Services;
- Ensuring the technical functioning of our network;
- Protecting and enforcing the rights or property of Palatium Auctions® or our users, including our sellers;
- Protecting network integrity and security, ensuring quality control, optimizing capacity and preventing misuse;
- Network enhancement planning, engineering and technical support;
- Conducting research and analysis for maintaining, protecting and developing our network and our Services;
- Preventing illegal activities, suspected fraud, and potential threats to our network;
- Investigating violations of our Terms of Service or other service conditions or restrictions; and
- Developing new Services.

Palatium Auctions® processes personal information on our servers in the United States of America. In some cases, we process personal information on a server outside your own country. We may process personal information to provide our own Services.

Choices For Personal Information

When you sign up for Services that require registration, we ask you to provide personal information. If we use this information in a manner different than the purpose for which it was collected, then we will ask for your consent prior to such use. If we propose to use personal information for any purposes other than those described in this Privacy Policy, we will offer you an effective way to opt out of the use of personal information for those other purposes.

Most browsers are initially set up to accept cookies, but you can reset your browser to refuse all cookies or to indicate when a cookie is being sent. However, some Services may not function properly if your cookies are

disabled. You can decline to submit personal information to us, in which case Palatium Auctions® may not be able to provide some or all Services to you.

Information Sharing

Palatium Auctions® only shares personal information with other companies or individuals outside of Palatium Auctions® in the following limited circumstances:

- We have your consent. We require opt-in consent for the sharing of any sensitive personal information.
- We provide such information to our subsidiaries, affiliated companies or other trusted businesses or persons for the purpose of processing personal information on our behalf. We require that these parties agree to process such information based on our instructions and in compliance with this Privacy Policy and any other appropriate confidentiality and security measures.
- We have a good faith belief that access, use, preservation or disclosure of such information is reasonably necessary to (a) satisfy any applicable law, regulation, legal process or enforceable governmental request or if required by law, such as to comply with a court-ordered subpoena, for regulatory oversight or for other legal process, (b) enforce applicable website terms of use and auction terms and conditions, including investigation of potential violations thereof, (c) detect, prevent, or otherwise address fraud, security or technical issues, or (d) protect against harm to the rights, property or safety of Palatium Auctions®, its users or the public as required or permitted by law.

If Palatium Auctions® becomes involved in a merger, acquisition, or any form of sale of some or all of its assets, we will ensure the confidentiality of any personal information involved in such transactions and provide notice before personal information is transferred in a manner that would make it subject to a different privacy policy. We may share with third parties certain pieces of aggregated, non-personal information, such as the number of users who searched for a particular term, for example, or how many users clicked on a particular asset listing or other part of our sites. Such information does not identify you individually.

Please contact us at the address above for any additional questions about the management or use of personal data.

Your Use of Materials and Information on this Website

You are responsible for the security of your usernames and passwords. Make sure you keep them in a safe place and do not share them with others. Should you lose control of your password please contact Palatium Auctions® immediately. Always remember to log out after your session ends to ensure that others cannot access your private personal information. You should take this precaution even if you are not using a public computer, such as at a library or internet café, but even when using your private computer in your home. The right to download and store or output the materials in our website is granted for personal use only, and materials may not be reproduced in any edited form. Any other reproduction, transmission, performance, display or editing of these materials or anything on our website by any means mechanical or electronic without the express written permission of us is strictly prohibited.

Information Security

We take appropriate security measures to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of data. We restrict access to personal information to Palatium Auctions® employees, contractors and agents who need to know that information in order to operate, develop or improve our Services.

These individuals are bound by confidentiality obligations and may be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations.

Data Integrity

Palatium Auctions® processes personal information only for the purposes for which it was collected and in accordance with this Privacy Policy. We review our data collection, storage and processing practices to ensure that we only collect, store and process the personal information needed to provide or improve our Services or as otherwise permitted under this Policy. We take reasonable steps to ensure that the personal information we process is accurate, complete, and current, but we depend on our users to update or correct their personal information whenever necessary.

Accessing and Updating Personal Information

When you use the Services we make good faith efforts to provide you with access to your personal information and either to correct this data if it is inaccurate or to delete such data at your request if it is not otherwise required to be retained by law or for legitimate business purposes. We ask individual users to identify themselves and the information requested to be accessed, corrected or removed before processing such requests, and we may decline to process requests that are unreasonably repetitive or systematic, require disproportionate technical effort, jeopardize the privacy of others, or would be extremely impractical (for instance, requests concerning information residing on backup tapes), or for which access is not otherwise required. In any case where we provide information access and correction, we perform this service free of charge, except if doing so would require a disproportionate effort.

Your E-mail

Please note that your e-mail, like most, if not all, non-encrypted Internet e-mail communications, may be accessed and viewed by other Internet users, without your knowledge and permission, while in transit to us. For that reason, to protect your privacy, please do not use e-mail to communicate information to us that you consider confidential. If you wish, you may contact us instead via telephone at the numbers provided on our websites.

Changes to This Privacy Policy

Each version of this Privacy Policy will be identified at the top of the page by its effective date. Palatium Auctions® may change this Statement from time to time; when updates are made, the Privacy Policy version date will also be updated to reflect that a revision occurred. We encourage you to periodically reread this policy to see if there have been any changes that may affect you. This statement is not intended to and does not create any contractual or other legal rights in or on behalf of any party.