

## **PRIVACY POLICY**

If you are a resident of any member state of the European Union, you are required to abide by Artwide's GDPR Privacy Notice in addition to this Privacy Policy.

ARTWIDE ("we" or "us") consider the privacy and protection of our clients' data, both corporate and personal, to be of the utmost importance and we take robust measures across our business to protect the security and integrity of all such information.

However, the law requires us to take particular steps in relation to the collection, processing, use, storage and protection of personal data. To ensure that you feel confident about providing us with your personal data when communicating with us and using our services, we outline below our practices in relation to the collection and use of personal data. This Privacy Policy (together with our Conditions of Use and any other documents referred to herein and/or in the Conditions of Use and where applicable, Artwide's GDPR Privacy Notice) sets out the basis on which we will collect, process, use and store your personal data. Please read this Privacy Policy carefully to ensure you understand how we collect, handle, process, use and store your personal data.

By visiting and/or using our platform (which includes our website [www.artwide.com](http://www.artwide.com) and our mobile application "Artwide" available on Apple iOS devices (through the Apple App Store) and Android devices (through Google Play)) (the "**Artwide Platform**") or using the services offered on or through the Artwide Platform, you agree to the terms of this Privacy Policy as they may be amended from time to time. You may withdraw consent in writing at any time, however, such withdrawal does not negate our right to process your data prior to withdrawal.

### **1. INFORMATION WE MAY COLLECT FROM YOU**

We may collect and process the following information about you either by asking you for the following information or from collecting it from your internet connected device (e.g. phone, computer, tablet) through your interaction with the Artwide Platform:

- information you provide by filling in any forms on the Artwide Platform (such as, but not limited to, your name; title; home and/or business address; email address; home and/or business telephone number; payment information; demographic information; art interests or preferences, art purchases, offer activity, payment history; and/or other information that may identify you as an individual or allow online or offline contact with you as an individual);
- information given in hard copy form or by any other means providing and/or including your name, details of your identification document (as provided and if any), date of birth, address, marketing preferences and any other personal data relevant to the services we provide. Such information may be provided when you are registering interest, transacting with us, subscribing to our services or requesting information;
- correspondence or other contacts you may have with us;
- details of transactions you carry out through the Artwide Platform or our brokerage offices, and any communications by telephone, in person, by email or by any other means relating to those transactions. This may include recording certain telephone conversations, for example relating to a transaction (which will only be done upon notifying you of this before such telephone communications take place);

- details of your visits to the Artwide Platform including, but not limited to, traffic data, web logs or other communication data and the resources you access on the Artwide Platform.

The information you provide to us will be used for processing transactions but may also be used for internal data processing, such as compiling statistical information about your interests and the use of the Artwide Platform. As a service to you, we may also use this information to customize the content we offer on the Artwide Platform.

Please note that we do not store or share bank account information, this information is stored by a third-party payment processor. The use and storage of this information is subject to the payment processor's terms of service and privacy policy.

## **2. SPECIFIC INFORMATION WE MAY COLLECT VIA THE ARTWIDE PLATFORM**

We may collect and process the following information obtained from your use of the Artwide Platform.

### **2.1 Cookies**

A cookie is a simple text file that is stored on your internet connected device (e.g. mobile phone, computer, tablet) by a website's server and only that server will be able to retrieve or read the contents of that cookie. Each cookie is unique to your web browser. It will contain some anonymous information such as a unique identifier and the website name and some digits and numbers. It allows a website to remember things like your preferences or what's in your shopping basket. Using our website will result in us placing cookies on your internet connected device in the 3 categories set out below, if you have permitted your internet connected device to accept the use of cookies.

- **Strictly necessary:** These cookies are essential to enable you to move around the website and use its features, such as accessing secure areas of the website; many of the functions on our website will not work properly, or at all, if you do not allow these cookies to be used. We may therefore be unable to provide many of the services you may wish to request unless you accept the use of these cookies.
- **Performance:** These cookies collect information about how visitors use a website, for instance which pages visitors go to most often. These cookies do not collect information that identifies a visitor: all information these cookies collect is aggregated and is therefore anonymous. The information is only used to improve how the website works.
- **Functionality:** These cookies allow the website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features (for example, remembering alerts you placed or favourites you selected).

Please note that most internet browsers can inform you when a cookie has been sent to you and can allow you to prevent the cookie from being placed on your internet connected device. However, refusing a cookie may, in some cases, preclude you from using, or negatively impact the display or function of, the Artwide Platform or certain areas or features of the Artwide Platform.

## **2.2 IP Address**

Internet Protocol address, or IP Address, is a number automatically assigned to your internet connected device by your Internet service provider whenever you are on the Internet.

We may collect information about your internet connected device, including your internet address, operating system and browser type when you visit us. Your internet address is used to help identify and gather statistical or demographic information about our customers generally. We also use this information for internal system administration to help diagnose problems with our servers, to administer the Artwide Platform and the customer or user experience. Such information may also be used to gather demographic information, such as country of origin and internet service provider. We may link this information with your personal data.

## **3. HOW IS YOUR PERSONAL DATA USED?**

Artwide will collect, record, store and use your personal data world-wide for clearly specified purposes including but not limited to:

- providing you with information, products or services that you request from us or which we believe would interest you in a way that is targeted and relevant. This could include but is not limited to web sales, private sales, valuations and expertise;
- carrying out our obligations arising from any contracts entered into between you and us;
- notifying you about changes to our products and services;
- ensuring that the Artwide Platform is presented in the most effective manner for you on your internet connected devices;
- selling or purchasing artworks or services provided by Artwide;
- (unless you opt-out) advising you of forthcoming web sales, private sales, promotions, events and services;
- maintaining our internal record keeping;
- complying with any legal obligations, enforcing our policies and Conditions of Use, and resolving disputes; and
- facilitating communications and transactions through the Artwide Platform.

We may contact you for the above purposes by phone, email, SMS messaging or any other communication means.

We may match information collected from you through different means or at different times, including both personal data and usage information arising out of use of the Artwide Platform and use such information along with information obtained from other sources, including third parties. We may also compare your contact information to data in our databases in order to improve the Artwide Platform and enhance Artwide's marketing capability.

## **4. SHARING & TRANSFER OF PERSONAL DATA**

We will not share your personal data with anyone outside the Artwide Platform other than in accordance with the law and as stated in this Privacy Policy. Each of the countries in which we operate has different privacy laws. Our Privacy Policy will reflect those.

However, by agreeing to the terms of this Privacy Policy and by using the Artwide Platform, you agree that where disclosure of your personal data to certain third parties is necessary, you consent to such transfer of your personal data.

#### **4.1 Agents or Contractors of Artwide**

We may need to disclose certain personal data to our agents or contractors (such as website or database hosting companies, address list hosting companies, email service providers, analytics companies, distribution companies, fulfillment companies, and other similar service providers that use such information on our behalf) to enable Artwide to process transactions or communicate with you. Where we do so it will be on the basis that these agents/contractors are required to keep the information confidential and secure, and will not use the information for any other purpose than to carry out the services they are performing for Artwide.

#### **4.2 Anti-Money Laundering and Regulatory Authorities**

We may need to retain and disclose certain information about you to regulatory authorities and to appropriate agencies to conduct anti-money laundering, terrorist and trade sanction checks and to assist with fraud prevention, in particular, in compliance with our AML obligations and in relation to anti-terrorism and/or trade sanctions. We will disclose this information as is required by law.

#### **4.3 Legal Disclosures**

While we will not voluntarily disclose your personal data we may disclose all or part of such information if we are compelled to do so by government authorities, at our discretion, or otherwise as required or permitted by law, including but not limited to in response to court orders and subpoenas, or if it becomes necessary to protect the rights or property of Artwide.

#### **4.4 Trade Sale or Merger**

In the event that Artwide, or substantially all of our assets, are acquired by one or more third parties as a result of an acquisition, merger, sale, reorganization, consolidation or liquidation, such databases containing personal data may be one of the transferred assets.

### **5. WORLDWIDE TRANSFERS AND PROCESSING**

As a global organisation, Artwide may process your personal data as described above. Each of the countries has different privacy laws offering different levels of protection for your personal data. Our Privacy Policy reflects these varying practices and we will act in accordance with this Privacy Policy in all jurisdictions we operate. By providing your personal data to Artwide, you consent to us processing your personal data in any jurisdiction, in accordance with this Privacy Policy. If you are a resident of any member state of the European Union, you are required to read and agree to Artwide's GDPR Privacy Notice.

### **6. DIRECT MARKETING**

In order to provide you with marketing information about our products and services, we may contact you by email, SMS or any other messaging service, telephone, and by post. At the

bottom of any marketing emails you will have a clearly marked unsubscribe option from future mailings. In addition, you may at any time send an email to [info@artwide.com](mailto:info@artwide.com) asking for your name to be removed from our lists.

Please understand that if you opt out of receiving marketing information from us, we may still contact you in connection with your relationship, activities, transactions and communications with us, and to comply with our legal obligations (such as changes to our policies). Also, any request to have us stop sharing your personal data with other entities for marketing purposes will only apply as of your request, and we will not be responsible for any communications that you may receive from entities that received your personal data prior to such request. In these cases, please contact that entity directly.

## **7. YOUR RIGHTS**

You have the legal right to access (in a portable format), amend or erase your personal data, or, in some circumstances, to restrict or object to the processing of your personal data. If you would like to take steps to exercise any of your rights, please contact us at [info@artwide.com](mailto:info@artwide.com).

We may refuse to provide access or may charge a fee for access if the relevant legislation allows us to do so. In any event, if we do refuse a request, we will provide reasons for our decision if so required by law.

In the limited circumstances where you have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time by contacting us at [info@artwide.com](mailto:info@artwide.com).

The personal data we hold about you should be up-to-date and accurate. Please inform us in writing of any changes to your data by contacting us at [info@artwide.com](mailto:info@artwide.com).

## **8. SECURITY**

We will take all reasonable and appropriate steps to protect the security and integrity of all personal data provided to the Artwide Platform, or by any other means electronic or otherwise.

We will ensure that your personal data within Artwide is suitably protected against both unauthorised physical and electronic access.

These measures include an electronic firewall and various other protection measures that involve virus scanning, installation of security patches, vulnerability testing, backup and recovery planning, employee training, security audits and other steps designed constantly to improve the data protection posture.

However, we cannot guarantee that information during transmission through the internet or any computer network is entirely safe from unauthorised intrusion, access or manipulation.

We will have no liability for disclosure of information due to errors or unauthorised acts of third parties. In any event, where we believe personal data has been compromised, we will notify you of this and would endeavour to do so within 72 hours after we are or become aware

of the occurrence of such incident, and, to the extent we have your email address, we may notify you by email. You consent to our use of email as a means of such notification.

## **9. THIRD PARTY WEBSITES**

The Artwide Platform contains links to other websites which are not operated by Artwide. The information you provide to us will not be transmitted to other websites.

However, these websites may collect personal data about you in accordance with their own privacy policies. Artwide is not responsible for the privacy practices or the content of such websites.

## **10. HOW LONG WILL ARTWIDE KEEP MY PERSONAL DATA?**

We will keep your personal data and records of any and/or all information associated with you and/or your account for as long as your account is in use or is open, as long as is necessary to comply with any tax, legal, and/or other regulatory requirements, and to protect and defend against potential legal claims.

Further, please note that, in the event that you have given consent to such use or provision, you may later request that Artwide ceases to use your personal data for direct marketing to which you have previously consented. We will comply with such a request without charge.

## **11. CHANGES TO THIS POLICY**

We reserve the right to amend or update this Privacy Policy and any of our privacy practices at any time and such changes will be effective immediately and without further notice.

Where appropriate, we may notify you directly of changes to the Privacy Policy either through email or a prominent notice on the Artwide Platform.

## **12. ENGLISH LANGUAGE PREVAILS**

If this Privacy Policy is published in a language other than English and there is any conflict between such version and the English version, then the English version shall prevail.

## **13. CONTACT**

If you have any queries in relation to the use and protection of your personal data please contact us at [info@artwide.com](mailto:info@artwide.com).

## **SECURITY**

### **1. REGISTRATION**

During the registration process, we may ask you to provide sensitive information that allows us to serve you better. We are keenly aware of the sensitivity of such information that you have entrusted to us and have taken security measures to safeguard your personal data online.

- You may access your account information online from the Artwide Platform only with your e-mail and password that is known to you only and that you have created on your online account when you have been accepted as member of the Artwide Platform.
- Artwide uses advanced technology to encrypt your login, password and information that is stored in a secure database allowing limited access to a select few of authorized Artwide employees only.
- Security professionals regularly conduct tests to determine our vulnerability and to fix flaws immediately.
- Security patches are applied immediately as soon as they are released by the contractors with whom we are working.

### **2. FRAUDULENT EMAILS**

Please note that Artwide never sends e-mails asking you to reply with your account or other personal data. You may use your private and secure Message Center tool on the Artwide Platform to directly communicate with us.

E-mail fraud is a common tool of identity thieves. An increasingly common fraudulent activity, called "phishing", uses official-looking e-mails to deceive consumers into disclosing their personal data.

The e-mail often directs the recipient to a look-alike website of a legitimate business, tricking consumers into believing they are responding to a valid request.

Other fraudulent e-mails entice users to make a purchase and are designed primarily to obtain credit card or bank account information. Artwide never sends e-mails asking you to reply with your account or other personal or financial information.

To avoid getting caught in any of these fraudulent activities, you are advised to:

- Keep your login details secret
- Change your password periodically
- Never give out your personal and account information by e-mail, telephone or whatever means, unless you initiated the contact
- Verify that you are on the Artwide Platform (whether you are using the website version or the mobile app version), whenever you are about to register, edit or add information to your account, or set up a new user account in your private Trading Account. You may want to add a URL to Artwide's website to your browser's Favourites or Bookmarks menu

- Always end your secure session on [www.artwide.com](http://www.artwide.com) completely by clicking the Log Out link (<http://artwide.com/logout>) at the top right-hand side of the page and by closing your browser's window

### **3. CONTACT**

If you have any queries or concerns regarding the use and protection of your personal data, please e-mail us at [info@artwide.com](mailto:info@artwide.com).