

## **PRIVACY POLICY OF WESTERN BID, INC.**

Western Bid, Inc. is located at 401 Lincoln Road, Suite 6H, Miami Beach, FL 33139, USA; and owns and operates the <https://www.Westernbid.net>, <https://westernbid.com>, <https://westernbid.info> , <https://westernbid.us> or <https://westernbid.eu> web sites. This Privacy Policy applies to all Western Bid customers, clients and vendors and shall be effective for all countries in which Western Bid renders services. The Privacy Policy below governs your Western Bid account and any information you provide on <https://www.Westernbid.net>, <https://westernbid.com>, <https://westernbid.info> , <https://westernbid.us> or <https://westernbid.eu>.

### **I. COMMITMENT TO PRIVACY**

Western Bid is committed to privacy of all of our users, including customers, clients and vendors. This Privacy Policy describes how we handle your personal information for our Services on Western Bid website. Our goal in handling information provided to us by you in connection with the processing of transactions on our Website is to comply with applicable data privacy laws and to offer users of our Website notice, choice, consent, security, data integrity, access and enforcement with regard to personal information provided to us by individuals in conjunction with those transactions.

### **II. GENERAL DESCRIPTION OF WESTERN BID'S PRIVACY POLICY**

1. In order to operate the Western Bid service and to reduce the risk of fraud, Western Bid Inc., ("Western Bid") must ask you to provide information about yourself and your bank account, as may be appropriate for your particular situation. This Privacy Policy describes the information Western Bid collects and how Western Bid uses that

information. Western Bid's use of the information you provide is only in accordance with the terms of this Privacy Policy. We will not sell or rent your personally identifiable information or a list of our customers to third parties. However, there are circumstances in which some of your information will be shared with third parties. Therefore, it is important for you to review this Privacy Policy. This Privacy Policy applies to all services that are hosted on the <https://www.Westernbid.net>, <https://westernbid.com>, <https://westernbid.info>, <https://westernbid.us> or <https://westernbid.eu> web sites, whether the services are offered by Western Bid, by its subsidiaries, or third parties.

2. By accepting the Privacy Policy and User Agreement in registration, you expressly consent to Western Bid's use and disclosure of your personal information in the manner described in this Privacy Policy. This Privacy Policy is incorporated into and subject to the terms of the Western Bid User Agreement.

3. Please note that your personal information will be stored and processed on our computers in the United States. The laws on holding personal data in the United States may be less stringent than the laws of your country but Western Bid will hold and transmit your personal information in a safe, confidential and secure environment. If you object to your personal information being transferred or used as described in this Privacy Policy, please do not register for the Western Bid service.

4. This policy may be revised over time as new features are added to the Western Bid service or as Western Bid incorporates suggestions from our customers. If Western Bid is going to use or disclose your personally identifiable information in a manner materially different from that stated at the time Western Bid collected the information, you will have a choice as to whether or not Western Bid uses or discloses your information in this new manner. Western Bid will post the amended Privacy Policy prominently on our Western Bid site so that you can always

review what information Western Bid gathers, how Western Bid might use that information, and whether Western Bid will disclose it to anyone. Please check the Western Bid site at [www.Westernbid.com](http://www.Westernbid.com) at any time for the most current version of our Privacy Policy.

5. Western Bid's site includes links to third party sites. These sites are governed by their own privacy statements, and Western Bid is not responsible for their content, representations or operations, including but not limited to their information practices. Users submitting information to or through these third party sites should review the privacy statement of these sites before providing them with personally identifiable information.

### **III. COLLECTION OF INFORMATION**

#### **A. Western Bid Account**

To open a Western Bid account, you must provide your name, address, phone number, date of birth, identification documents, proof of address and e-mail address. In order to make payments through Western Bid, you must also provide bank account or other related financial information.

In order to comply with the Bank Secrecy Act, Western Bid may also require additional personal or company information if you send or receive certain high-value product transactions or high overall payment volumes through Western Bid. If you choose to register or apply for certain optional services or products offered through third party sites you may be required to provide additional information to establish that you qualify for such services or products. Western Bid may use cookies, web tools and logs to collect information (you may stop your browser from accepting cookies or web beacons).

## **B. Transactional Information**

When you use Western Bid to place a purchase order for a product to someone else, Western Bid asks you to provide information related to each product transaction, which may include the amount of the transaction, the type of transaction (purchase of goods, purchase of services and the e-mail address of the third party), identity of supplier or affiliate, customer identify, payment type and currency, location, bank account information, credit and debit card information; dates of birth; and identification documents. Western Bid retains this information for each of your transactions through Western Bid. Western Bid also collects the Internet address (IP address) of the computer, or device you use to access your Western Bid account, in order to help detect possible instances of unauthorized transactions or use.

## **C. Information From Third Parties**

In order to protect all Western Bid customers against potential fraud, Western Bid verifies with third parties the information you provide. In the course of such verification, Western Bid receives personally identifiable information about you from such services. In particular Western Bid will use screening services to verify that your information and address matches the information that you supplied to Western Bid.

#### **D. Verification**

If Western Bid cannot verify the information that you provide, or if you request a withdrawal to an address other than your verified billing address, Western Bid will ask you to send us additional information via upload through the website (such as your drivers' license, passport, and/or a recent utility bill or other information linking you to the applicable address), and Western Bid will ask you additional questions to verify your information.

#### **E. Customer Service Correspondence**

If you send us correspondence, including e-mails and faxes, Western Bid retains such information in the records of your account. Western Bid will also retain customer service correspondence and other correspondence from Western Bid to you. Western Bid may, over time, delete these records if permitted by law.

#### **F. Third Party Recipients**

When a User places a product purchase order to an individual who is not a member of Western Bid, Western Bid will retain the information that the User submits to us, including, for example, the other party's email address and/or name, for the benefit of the User who is attempting to contact the non-member, so that the User can see a complete record of his or her transactions, including uncompleted transactions.

## **G. Non-Personally Identifiable Information**

Western Bid may collect other information which does not in and of itself identify a specific individual. This information includes IP addresses, search terms, domain names and browser types. We use this information to track usage and other patterns on our Websites.

## **H. Community Forum**

Western Bid collects information from you to post entries to our community forums. Such information may include your email address, Internet Protocol address, user name, date and time of signup, and date and time of posts to the forum. Western Bid may also collect and retain any other information posed on the form.

## **III. WESTERN BID'S INTERNAL USE OF PERSONAL INFORMATION**

Western Bid collects stores and processes your personal information on servers located in the United States. Western Bid uses the information Western Bid collects about you in order to; 1) provide our services and process your transactions, 2) provide customer service, 3) recover debt, 4) detect and prevent fraud, 5) detect and prevent violation of Western Bid's legal agreements, or limit Western Bid's damages, 6) perform other technical, logistical, financial, tax, legal, compliance, administrative, or back office functions, and 7) improve our products and services. At your option, Western Bid may use the information you provide to access specific third party services on your behalf and perform the actions that you request us to perform.

#### **IV. WESTERN BID'S DISCLOSURE OF INFORMATION TO THIRD PARTIES**

1. Western Bid will not sell or rent any of your personally identifiable information to third parties. Western Bid will not share any of your personally identifiable information with third parties except in the limited circumstances described below, or with your express permission (with the exception described above). These third parties are limited by law or by contract from using the information for secondary purposes beyond the purposes for which the information is shared. These third parties are not permitted to sell the information we provide to them, to market directly to you, or to disclose it in any other way without your explicit consent.

2. Western Bid may share information with companies that help us process the transactions you request, offer proper technical support, recover debt, and protect our customers' transactions from fraud. Such companies may include financial institutions, payment processors, auditors; background and credit check organizations; fraud prevention service providers and anti-fraud networks; marketing service providers; database managers; customer service providers and representatives; debt collectors; and others who perform technical, logistical, financial, tax, legal, compliance, or administrative functions on our behalf. Western Bid discloses information that Western Bid in good faith believe is appropriate to cooperate in investigations of fraud or other illegal activity, or to conduct investigations of violations of our User Agreement. For example, this means that if Western Bid conducts a fraud investigation and concludes that a person or entity has engaged in deceptive practices, Western Bid can provide that person's or entity's contact information to victims who request it.

3. Western Bid may disclose information in response to a subpoena, warrant, court order, levy, attachment, order of a court-appointed receiver or other comparable legal process, including subpoenas from private parties in a civil action. Western Bid is not required to provide you any notice of such disclosure.

4. Western Bid reserves the right to report to any government authorities any activities that we believe to be unlawful. This includes compliance with applicable laws and regulations relating to collection and use of information from children, including the Children's On-line Privacy Protection Act of the United States. We may also disclose personal information if we have reasonable grounds to believe that use or disclosure is necessary to protect the rights, privacy, property, or safety of our users or others. Any report made under this paragraph shall be made without prior notice to you.

5. Western Bid may disclose the information that you voluntarily ask us to disclose.

6. Western Bid may disclose information to your agent or legal representative (such as the holder of a power of attorney that you grant, or a guardian appointed for you).

7. Western Bid may also provide links from our Website to third party websites who may provide services to you directly or on our behalf. THE PRIVACY POLICIES OF THESE THIRD PARTY SITES MAY BE DIFFERENT FROM OUR PRIVACY POLICIES AND WILL GOVERN ANY TRANSACTIONS UNDERTAKEN ON THAT SITE. We urge you to review the privacy policy of any site to which you are linked.

8. As with any other business, it is possible that Western Bid in the future could merge with or be acquired by another company. If such an acquisition occurs, the



successor company would have access to the information maintained by Western Bid, including customer account information, but would continue to be bound by this Privacy Policy.

## **V. WESTERN BID'S DISCLOSURE OF INFORMATION TO CUSTOMERS**

1. Western Bid communicates with Users on a regular basis via e-mail to provide requested services, and Western Bid also communicates by phone to resolve customer complaints or investigate suspicious transactions. Western Bid uses your e-mail address to confirm your opening of a Western Bid account, to send you notice of product purchase orders that you place through Western Bid, to send information about important changes to our products and services, and to send notices and other disclosures required by law.

2. In order to facilitate the transactions for Western Bid Users, our service allows you limited access to other users' contact or shipping information. As a seller you may have access to the User ID, email address and other contact or shipping information of the purchaser. As a purchaser, you may have access to the User ID, email address and other contact information of the seller. Western Bid is not responsible for any information you may choose to share with other customers.

3. By entering into Western Bid's User Agreement, you agree that, with respect to other users' personally identifiable information that you obtain through the site or through a Western Bid communication or Western Bid facilitated product transaction, you will use this information only for: (a) Western Bid related communications that are not unsolicited commercial messages, and (b) services offered through Western Bid.

4. Western Bid does not tolerate spam. You may not add a Western Bid user to your mail list (email or physical mail) without their express consent after adequate disclosure, even if said user has previously made a purchase from you. Western Bid strictly enforces its Anti-Spam Policy. Please report Western Bid-related spam to us as soon as possible.

## **VI. INTERNET AND WEBSITE SECURITY**

1. Western Bid is committed to handling the customer information with high standards of information security. Western Bid maintains physical, electronic and procedural safeguards to guard your nonpublic personal information. We will continue to assess new technology for protecting information and upgrade our information security systems when appropriate.

2. Western Bid combines technical and physical safeguards with employee policies and procedures to protect your information. We restrict access to your personally identifiable information to employees who need to know that information in order to provide products or services to you. If an employee misuses personal information, we may take disciplinary action, up to and including termination of employment. If any third party individual or organization misuses personal information, we may take action, up to and including termination of any agreement between Western Bid and that individual or organization.

3. It is important to understand that the security of your Western Bid account also relies on your protection of your Western Bid password. Your password is a key security feature and you should not and may not share your Western Bid password with anyone. Western Bid will not ask you to send your password or other sensitive information to us in an e-mail, though Western Bid may ask you to enter this type of information on the Western Bid website, which will have a URL beginning with <https://www.Westernbid.net>, <https://westernbid.com>, <https://westernbid.info> , <https://westernbid.us> or <https://westernbid.eu> . Any e-

mail or other communication requesting your password, asking you to provide sensitive account information via email, or linking to a Western Bid website with a URL that does not begin with <https://www.Westernbid.net>, <https://westernbid.com>, <https://westernbid.info> , <https://westernbid.us> or <https://westernbid.eu> should be treated as unauthorized and suspicious and should be reported to Western Bid immediately.

4. If you do share your Western Bid password with a third party for any reason, the third party will have access to your account and your personal information, and you may be responsible for actions taken using your password. If you believe someone else has obtained access to your password, please change it immediately by logging in to your account at <https://www.Westernbid.net>, <https://westernbid.com>, <https://westernbid.info> , <https://westernbid.us> or <https://westernbid.eu> and changing your Profile settings. You should contact us right away.

## **VII. MODIFICATION AND TERMINATION OF USER ACCOUNT**

1. You can review the personal information you provided to us and make any desired changes to such information, or to the settings for your Western Bid account, at any time by logging in to your account on the Western Bid web site and changing your preferences.

2. You can close your account through the Western Bid web site by sending a request to customer service. If you close your Western Bid account, Western Bid reserves the right to keep your account information in our database. This is necessary in order to deter fraud, by ensuring that persons who try to commit fraud will not be able to avoid detection simply by closing their account and opening a new account. If you close your account, your personally identifiable information will not be used by us for any further purposes, nor sold or shared with third

parties, except as necessary to prevent fraud and assist law enforcement, or as required by law.

#### **VIII. CONTACT INFORMATION**

If you have any questions about this privacy policy, Western Bid's information practices, or your dealings with Western Bid, you can contact customer service at (763) 545-1768, by email at [sales@westernbid.com](mailto:sales@westernbid.com) or write to Western Bid, Inc., 401 Lincoln Road, Suite 6H, Miami Beach, FL 33139, USA.