

Western Bid Europe Privacy Policy

Effective Date: May 24, 2018

Introduction

Western Bid Europe is strongly committed to protecting the privacy of its members and visitors. This privacy policy describes what information Western Bid Europe may collect from its members and visitors and how we may use that information once it is collected.

We, Western Bid Europe (hereinafter referred to as "**Company** ") are very delighted that you visit our website westernbid.com (hereinafter referred to as "**Website**"). Data protection is of a particularly high priority for the management of the Company . The use of the Internet pages of the Website is possible without any indication of personal data; however, if a data subject wants to use special enterprise services via our website, processing of personal data could become necessary. If the processing of personal data is necessary and there is no statutory basis for such processing, we generally obtain consent from the data subject.

The processing of personal data, such as the name, address, e-mail address, or telephone number of a data subject shall always be in line with the **EU General Data Protection Regulation (Art. 13 EU Data General Data Protection Regulation, GDPR)** and **US Patriot Act** requirements and in accordance with the country-specific data protection regulations applicable to Website. By means of this data protection declaration, our enterprise would like to inform the general public of the nature, scope, and purpose of the personal data we collect, use and process.

Furthermore, data subjects are informed, by means of this data protection declaration, of the rights to which they are entitled.

As the controller, the Company has implemented numerous technical and organizational measures to ensure the most complete protection of personal data processed through this website. However, Internet-based data transmissions may in principle have security gaps, so absolute protection may not be guaranteed. For this reason, every data subject is free to transfer personal data to us via alternative means, e.g. by telephone.

Definitions

The data protection declaration of the Company is based on the terms used by the European legislator for the adoption of the General Data Protection Regulation (GDPR). Our data protection declaration should be legible and understandable for the general public, as well as our customers and business partners. To ensure this, we would like to first explain the terminology used.

In this data protection declaration, we use, inter alia, the following terms:

- **a) Personal data**
Personal data means any information relating to an identified or identifiable natural person ("data subject"). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- **b) Data subject**
Data subject is any identified or identifiable natural person, whose personal data is processed by the controller responsible for the processing.
- **c) Processing**
Processing is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

- **d) Restriction of processing**
Restriction of processing is the marking of stored personal data with the aim of limiting their processing in the future.
- **e) Profiling**
Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements.
- **f) Pseudonymisation**
Pseudonymisation is the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.
- **g) Controller or controller responsible for the processing**
Controller or controller responsible for the processing is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.
- **h) Processor**
Processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.
- **i) Recipient**
Recipient is a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.
- **j) Third party**
Third party is a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data.
- **k) Consent**
Consent of the data subject is any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.
- **l) Product Shipper**
Product Shipper is a natural or legal person, public authority, agency or other body (i.e. Deutsche Post) which involves in shipping process of your purchase on behalf of the controller or by direct order of the controller.

Name and Address of the controller

Controller for the purposes of the General Data Protection Regulation (GDPR), other data protection laws applicable in Member states of the European Union and other provisions related to data protection is:

Western Bid Europe
Ludwig-Wilhelm-Str. 4
76131 Karlsruhe
Deutschland
Phone: +49 721 669 76 522
Email: euro@westernbid.com

What Websites Does This Policy Apply To?

This privacy policy applies to the website located at <https://westernbid.com> (the "Website"). It does not apply to any other websites, including those that link to the Website or third-party websites that Website links to. This policy does not apply to the practices of any third party, affiliate, or business partner that Company does not own or control.

Privacy Policy Changes

Company reserves the right to change its privacy policy at any time without prior notice. Any changes to the Privacy Policy will be posted on this page and will be effective immediately upon posting.

Collection of general data and information

The website of the Company may collect a series of general data and information when a data subject or automated system calls up the website. This general data and information are stored in the server log files. Collected may be (1) the browser types and versions used, (2) the operating system used by the accessing system, (3) the website from which an accessing system reaches our website (so-called referrers), (4) the sub-websites, (5) the date and time of access to the Internet site, (6) an Internet protocol address (IP address), (7) the Internet service provider of the accessing system, and (8) any other similar data and information that may be used in the event of attacks on our information technology systems.

When using these general data and information, Company does not draw any conclusions about the data subject. Rather, this information is needed to (1) deliver the content of our website correctly, (2) optimize the content of our website as well as its advertisement, (3) ensure the long-term viability of our information technology systems and website technology, and (4) provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack. Therefore, Company analyzes anonymously collected data and information statistically, with the aim of increasing the data protection and data security of our enterprise, and to ensure an optimal level of protection for the personal data we process. The anonymous data of the server log files are stored separately from all personal data provided by a data subject.

The personal data we may hold about you is given directly by you and by people or companies authorized by you to act on your behalf, and it may also include information obtained from those third parties authorized by you to share such information with us, including:

- (a) Information that you provide by filling in forms on the Service, posting User Content or requesting further services or reporting a problem;
- (b) Name, addresses, and contact details including your e-mail address, home address and telephone numbers;
- (c) Payment details (e.g. payment methods, billing address);
- (d) Any other data or information that we or any of our suppliers must request from you in order to perform our service;
- (e) Information that you provide by filling in our surveys;
- (f) Details of your visits to the Service and the resources that you access (see also our Cookie Policy);
- (g) Internet protocol addresses, time zone/region, browser type/language, operating system, internet service provider, system details/settings;
- (h) Information about activities you undertake, such as the pages you visit, searches you make or marketing or links you click;
- (i) Transaction Data: retailers used, items purchased, value of transactions;

We aim to keep your personal data up-to-date, so please advise us of any changes by updating your Account or e-mailing insert email address. You must notify us within thirty days of any change in your name, residential address, contact details, identification evidence given to us and any other details that we reasonably consider to be material to our dealings with you in relation to the Service. We rely on you providing accurate information to enable us to exercise our rights and comply with our obligations under this Privacy Policy and cannot be held responsible if you providing incorrect information in relation to age, for example.

Some of the information that we collect about you may include special categories of personal data (such as information about racial or ethnic origin, criminal or alleged criminal offences). We will usually seek separate permission from you in writing to process these special categories of personal data.

If you fail to provide us with this information, or you object to us processing such information the consequences are that we may be prevented from conducting business with you, or continuing to manage your account(s) with us and we may be unable to provide our services to you.

We collect personal information for the following reasons:

- To provide our service – We require some of your basic personal information so our services work as you would expect, for example, delivering the newspaper to your correct address, providing access to our digital content, notifying you of changes to our services and dealing with customer services queries. We keep records of communications with our customers for monitoring and training purposes.
- To improve and maintain performance – In order to provide you with the best possible user experience, we need to make sure that our products and services work as they should. Using personal information helps us understand how our readers use our Sites so we can make improvements. This includes testing proposed developments on our Sites, reaching out to our customers to communicate changes or new offerings.
- To bill our customers – We provide you with the ability to pay for subscriptions and other services through a third party payment processing service provider. We will also update your payment information in the event that a payment is unsuccessful. You can manage your payment information at any time by contacting customer services at euro@westernbid.com
- To monitor compliance with our policies and terms – For example, we monitor activity on our Sites to detect and prevent invalid or fraudulent traffic.
- To personalize our products and services – We improve your experience of our products and services by personalizing parts of our Sites with the information you give us and what we learn about you. This includes showing you articles you may be interested in and recommending emails you may wish to sign up to. Where our Sites have such functionality, you can manage elements of personalization in your account settings.
- To communicate product changes and offers – We want you to get the most out of our products and services, including showcasing our latest content and newsletters. On some occasions, we will contact you with offers and promotions, exclusive event invitations and feature announcements. You are able to change your preferences at any time by contacting customer services. We also personalize our communications for strategic purposes. For example, we might offer group subscriptions to certain companies.
- For the purpose of advertising – We rely on advertising revenue in part to support our journalism. We need to process your information to understand the effectiveness of the advertising we serve to you and others, and to deliver relevant advertising. You may also see advertisements that are targeted to you based on other non-personal information, for example, the article that you are reading.

Sharing your personal data

We will keep your personal data confidential and only disclose it to others for the purposes explained when you applied to open an account. We will ensure that if we share such information with third parties, any such disclosure is at all times in compliance with Data Protection Legislation. We may share your personal data:

- (a) If substantially all of our assets are acquired by a third party, in which case Personal Data held by us about our customers will be one of the transferred assets;
- (b) If we are under a duty to disclose or share your Personal Data in order to comply with any legal obligation, or in order to enforce or apply any agreements to which you are a party; or to protect our rights, property, or safety, or that of our customers, or others (which includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction);
- (c) If you request us, or give your permission for us to do so;

(d) if you make a purchase from us through our website or through various online auctions and/or marketplaces and your purchase requires a delivery. In this case we may share your shipping information (your name, your address, your email and your phone number) to the Product Shipper to use for the purpose of shipping or mailing your purchases to you, under an obligation to take appropriate technical and organizational security measures against the unauthorized or unlawful processing of personal data and against the accidental loss or destruction of, or damage to, such personal data;

(e) For audit purposes and to meet obligations to any relevant regulatory authority or taxing authority;

(f) To comply with a subpoena or other similar legal procedure;

(g) To legal authorities in order to defend the rights of Company and/or to take legal actions regarding violations of Company's User Agreement.

Registration on our website

In order to purchase items from the Company, you are not required to register on our Website. The various services provided by the Company are not available to EU citizens and/or residents according to Company's User Agreement.

The data subject has the possibility to register on the website of the controller with the indication of personal data. Which personal data are transmitted to the controller is determined by the respective input mask used for the registration. The personal data entered by the data subject are collected and stored exclusively for internal use by the controller, and for his own purposes. The controller may request transfer to one or more processors (e.g. a parcel service) that also uses personal data for an internal purpose which is attributable to the controller.

By registering on the website of the controller, the IP address—assigned by the Internet service provider (ISP) and used by the data subject—date, and time of the registration are also stored. The storage of this data takes place against the background that this is the only way to prevent the misuse of our services, and, if necessary, to make it possible to investigate committed offenses. Insofar, the storage of this data is necessary to secure the controller. This data is not passed on to third parties unless there is a statutory obligation to pass on the data, or if the transfer serves the aim of criminal prosecution.

The registration of the data subject, with the voluntary indication of personal data, is intended to enable the controller to offer the data subject contents or services that may only be offered to registered users due to the nature of the matter in question. Registered persons are free to change the personal data specified during the registration at any time, or to have them completely deleted from the data stock of the controller.

The data controller shall, at any time, provide information upon request to each data subject as to what personal data are stored about the data subject. In addition, the data controller shall correct or erase personal data at the request or indication of the data subject, insofar as there are no statutory storage obligations. The entirety of the controller's employees are available to the data subject in this respect as contact persons.

Contact possibility via the website

Website contains information that enables a quick electronic contact to our enterprise, as well as direct communication with us, which also includes a general address of the so-called electronic mail (e-mail address). If a data subject contacts the controller by e-mail or via a contact form, the personal data transmitted by the data subject are automatically stored. Such personal data transmitted on a voluntary basis by a data subject to the data controller are stored for the purpose of processing or contacting the data subject. There is no transfer of this personal data to third parties.

Routine erasure and blocking of personal data

The data controller shall process and store the personal data of the data subject only for the period necessary to achieve the purpose of storage, or as far as this is granted by the European legislator or other legislators in laws or regulations to which the controller is subject to.

If the storage purpose is not applicable, or if a storage period prescribed by the European legislator or another competent legislator expires, the personal data are routinely blocked or erased in accordance with legal requirements.

Rights of the data subject in compliance with EU General Data Protection Regulation (GDPR)

- **a) Right of confirmation**

Each data subject shall have the right granted by the European legislator to obtain from the controller the confirmation as to whether or not personal data concerning him or her are being processed. If a data subject wishes to avail himself of this right of confirmation, he or she may, at any time, contact any employee of the controller.

- **b) Right of access**

Each data subject shall have the right granted by the European legislator to obtain from the controller free information about his or her personal data stored at any time and a copy of this information. Furthermore, the European directives and regulations grant the data subject access to the following information:

- the purposes of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations;
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- the existence of the right to request from the controller rectification or erasure of personal data, or restriction of processing of personal data concerning the data subject, or to object to such processing;
- the existence of the right to lodge a complaint with a supervisory authority;
- where the personal data are not collected from the data subject, any available information as to their source;
- the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for the data subject.

Furthermore, the data subject shall have a right to obtain information as to whether personal data are transferred to a third country or to an international organisation. Where this is the case, the data subject shall have the right to be informed of the appropriate safeguards relating to the transfer.

If a data subject wishes to avail himself of this right of access, he or she may, at any time, contact any employee of the controller.

- **c) Right to rectification**

Each data subject shall have the right granted by the European legislator to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

If a data subject wishes to exercise this right to rectification, he or she may, at any time, contact any employee of the controller.

- **d) Right to erasure (Right to be forgotten)**

Each data subject shall have the right granted by the European legislator to obtain from the controller the erasure of personal data concerning him or her without undue delay, and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies, as long as the processing is not necessary:

- The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed.
- The data subject withdraws consent to which the processing is based according to point (a) of Article 6(1) of the GDPR, or point (a) of Article 9(2) of the GDPR, and where there is no other legal ground for the processing.
- The data subject objects to the processing pursuant to Article 21(1) of the GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2) of the GDPR.
- The personal data have been unlawfully processed.
- The personal data must be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.
- The personal data have been collected in relation to the offer of information society services referred to in Article 8(1) of the GDPR.

If one of the aforementioned reasons applies, and a data subject wishes to request the erasure of personal data stored by Company, he or she may, at any time, contact any employee of the controller. An employee of Company shall promptly ensure that the erasure request is complied with immediately.

Where the controller has made personal data public and is obliged pursuant to Article 17(1) to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform other controllers processing the personal data that the data subject has requested erasure by such controllers of any links to, or copy or replication of, those personal data, as far as processing is not required. An employee of the Company will arrange the necessary measures in individual cases.

- **e) Right of restriction of processing**

Each data subject shall have the right granted by the European legislator to obtain from the controller restriction of processing where one of the following applies:

- The accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data.
- The processing is unlawful and the data subject opposes the erasure of the personal data and requests instead the restriction of their use instead.
- The controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims.
- The data subject has objected to processing pursuant to Article 21(1) of the GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject.

If one of the aforementioned conditions is met, and a data subject wishes to request the restriction of the processing of personal data stored by the Company, he or she may at any time contact any employee of the controller. The employee of the Company will arrange the restriction of the processing.

- **f) Right to data portability**

Each data subject shall have the right granted by the European legislator, to receive the personal data concerning him or her, which was provided to a controller, in a structured, commonly used and machine-readable format. He or she shall have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, as long as the processing is based on consent pursuant to point (a) of Article 6(1) of the GDPR or point (a) of Article 9(2) of the GDPR, or on a contract pursuant to point (b) of Article 6(1) of the

GDPR, and the processing is carried out by automated means, as long as the processing is not necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Furthermore, in exercising his or her right to data portability pursuant to Article 20(1) of the GDPR, the data subject shall have the right to have personal data transmitted directly from one controller to another, where technically feasible and when doing so does not adversely affect the rights and freedoms of others.

In order to assert the right to data portability, the data subject may at any time contact any employee of the Company.

- **g) Right to object**

Each data subject shall have the right granted by the European legislator to object, on grounds relating to his or her particular situation, at any time, to processing of personal data concerning him or her, which is based on point (e) or (f) of Article 6(1) of the GDPR. This also applies to profiling based on these provisions.

The Company shall no longer process the personal data in the event of the objection, unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defense of legal claims.

If the Company processes personal data for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing. This applies to profiling to the extent that it is related to such direct marketing. If the data subject objects to the Company to the processing for direct marketing purposes, the Company will no longer process the personal data for these purposes.

In addition, the data subject has the right, on grounds relating to his or her particular situation, to object to processing of personal data concerning him or her by the Company for scientific or historical research purposes, or for statistical purposes pursuant to Article 89(1) of the GDPR, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

In order to exercise the right to object, the data subject may contact any employee of the Company. In addition, the data subject is free in the context of the use of information society services, and notwithstanding Directive 2002/58/EC, to use his or her right to object by automated means using technical specifications.

- **h) Automated individual decision-making, including profiling**

Each data subject shall have the right granted by the European legislator not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her, or similarly significantly affects him or her, as long as the decision (1) is not necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) is not authorized by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, or (3) is not based on the data subject's explicit consent.

If the decision (1) is necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) it is based on the data subject's explicit consent, the Company shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express his or her point of view and contest the decision.

If the data subject wishes to exercise the rights concerning automated individual decision-making, he or she may, at any time, contact any employee of Company.

- **i) Right to withdraw data protection consent**

Each data subject shall have the right granted by the European legislator to withdraw his or her consent to processing of his or her personal data at any time.

If the data subject wishes to exercise the right to withdraw the consent, he or she may, at any time, contact any employee of Company.

Data protection provisions about the application and use of Facebook

On this website, the controller has integrated components of the enterprise Facebook. Facebook is a social network.

A social network is a place for social meetings on the Internet, an online community, which usually allows users to communicate with each other and interact in a virtual space. A social network may serve as a platform for the exchange of opinions and experiences, or enable the Internet community to provide personal or business-related information. Facebook allows social network users to include the creation of private profiles, upload photos, and network through friend requests.

The operating company of Facebook is Facebook, Inc., 1 Hacker Way, Menlo Park, CA 94025, United States. If a person lives outside of the United States or Canada, the controller is the Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland.

With each call-up to one of the individual pages of this Internet website, which is operated by the controller and into which a Facebook component (Facebook plug-ins) was integrated, the web browser on the information technology system of the data subject is automatically prompted to download display of the corresponding Facebook component from Facebook through the Facebook component. An overview of all the Facebook Plug-ins may be accessed under <https://developers.facebook.com/docs/plugins/>. During the course of this technical procedure, Facebook is made aware of what specific sub-site of our website was visited by the data subject.

If the data subject is logged in at the same time on Facebook, Facebook detects with every call-up to our website by the data subject—and for the entire duration of their stay on our Internet site—which specific sub-site of our Internet page was visited by the data subject. This information is collected through the Facebook component and associated with the respective Facebook account of the data subject. If the data subject clicks on one of the Facebook buttons integrated into our website, e.g. the "Like" button, or if the data subject submits a comment, then Facebook matches this information with the personal Facebook user account of the data subject and stores the personal data.

Facebook always receives, through the Facebook component, information about a visit to our website by the data subject, whenever the data subject is logged in at the same time on Facebook during the time of the call-up to our website. This occurs regardless of whether the data subject clicks on the Facebook component or not. If such a transmission of information to Facebook is not desirable for the data subject, then he or she may prevent this by logging off from their Facebook account before a call-up to our website is made.

The data protection guideline published by Facebook, which is available at <https://facebook.com/about/privacy/>, provides information about the collection, processing and use of personal data by Facebook. In addition, it is explained there what setting options Facebook offers to protect the privacy of the data subject. In addition, different configuration options are made available to allow the elimination of data transmission to Facebook. These applications may be used by the data subject to eliminate a data transmission to Facebook.

Data protection provisions about the application and use of JivoChat online chat

On this website, the controller has integrated components of the Jivosite, Inc.. Jivochat is an online chat used for communications between Website user and Company's Customer support operator. Besides the information that you willing to share in the Jivochat online chat to the Company's Customer support operator, Jivochat collects your IP address and the information about your visit of our Website, i.e. date and time of each visit and webpage addresses you visited during the session and other aggregate tracking and Website usage information that is gathered automatically when you use the JivoChat Service. Jivosite, Inc. does not link your IP address to anything personally identifiable; however, it does track the state and/or country you are accessing the Internet from, the date and time you visited and the type of computer, operating system and Web browser you are using. The operating company of Jivochat is Jivosite, Inc., 1103 Centre Road, Wilmington, #403-B, DE 19805, United States. Further information

and the applicable data protection provisions of Jivochat may be retrieved under <https://www.jivochat.com/privacy/>

Data protection provisions about the application and use of Google-AdWords

On this website, the controller has integrated Google AdWords. Google AdWords is a service for Internet advertising that allows the advertiser to place ads in Google search engine results and the Google advertising network. Google AdWords allows an advertiser to pre-define specific keywords with the help of which an ad on Google's search results only then displayed, when the user utilizes the search engine to retrieve a keyword-relevant search result. In the Google Advertising Network, the ads are distributed on relevant web pages using an automatic algorithm, taking into account the previously defined keywords. The operating company of Google AdWords is Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, UNITED STATES.

The purpose of Google AdWords is the promotion of our website by the inclusion of relevant advertising on the websites of third parties and in the search engine results of the search engine Google and an insertion of third-party advertising on our website.

If a data subject reaches our website via a Google ad, a conversion cookie is filed on the information technology system of the data subject through Google. The definition of cookies is explained above. A conversion cookie loses its validity after 30 days and is not used to identify the data subject. If the cookie has not expired, the conversion cookie is used to check whether certain sub-pages, e.g. the shopping cart from an online shop system, were called up on our website. Through the conversion cookie, both Google and the controller can understand whether a person who reached an AdWords ad on our website generated sales, that is, executed or canceled a sale of goods.

The data and information collected through the use of the conversion cookie is used by Google to create visit statistics for our website. These visit statistics are used in order to determine the total number of users who have been served through AdWords ads to ascertain the success or failure of each AdWords ad and to optimize our AdWords ads in the future. Neither our company nor other Google AdWords advertisers receive information from Google that could identify the data subject.

The conversion cookie stores personal information, e.g. the Internet pages visited by the data subject. Each time we visit our Internet pages, personal data, including the IP address of the Internet access used by the data subject, is transmitted to Google in the United States of America. These personal data are stored by Google in the United States of America. Google may pass these personal data collected through the technical procedure to third parties.

The data subject may, at any time, prevent the setting of cookies by our website, as stated above, by means of a corresponding setting of the Internet browser used and thus permanently deny the setting of cookies. Such a setting of the Internet browser used would also prevent Google from placing a conversion cookie on the information technology system of the data subject. In addition, a cookie set by Google AdWords may be deleted at any time via the Internet browser or other software programs. The data subject has a possibility of objecting to the interest based advertisement of Google. Therefore, the data subject must access from each of the browsers in use the link www.google.de/settings/ads and set the desired settings.

Further information and the applicable data protection provisions of Google may be retrieved under <https://www.google.com/intl/en/policies/privacy/>.

Data protection provisions about the application and use of Instagram

On this website, the controller has integrated components of the service Instagram. Instagram is a service that may be qualified as an audiovisual platform, which allows users to share photos and videos, as well as disseminate such data in other social networks.

The operating company of the services offered by Instagram is Instagram LLC, 1 Hacker Way, Building 14 First Floor, Menlo Park, CA, UNITED STATES.

With each call-up to one of the individual pages of this Internet site, which is operated by the controller and on which an Instagram component (Insta button) was integrated, the Internet browser on the information technology system of the data subject is automatically prompted to the download of a display of the corresponding Instagram component of Instagram. During the course of this technical procedure, Instagram becomes aware of what specific sub-page of our website was visited by the data subject. If the data subject is logged in at the same time on Instagram, Instagram detects with every call-up to our website by the data subject—and for the entire duration of their stay on our Internet site—which specific sub-page of our Internet page was visited by the data subject. This information is collected through the Instagram component and is associated with the respective Instagram account of the data subject. If the data subject clicks on one of the Instagram buttons integrated on our website, then Instagram matches this information with the personal Instagram user account of the data subject and stores the personal data.

Instagram receives information via the Instagram component that the data subject has visited our website provided that the data subject is logged in at Instagram at the time of the call to our website. This occurs regardless of whether the person clicks on the Instagram button or not. If such a transmission of information to Instagram is not desirable for the data subject, then he or she can prevent this by logging off from their Instagram account before a call-up to our website is made.

Further information and the applicable data protection provisions of Instagram may be retrieved under <https://help.instagram.com/155833707900388> and <https://www.instagram.com/about/legal/privacy/>.

Payment Method: Data protection provisions about the use of PayPal as a payment processor

On this Website and on other online auctions and marketplaces, as a part of the process of purchasing goods from the Company, the controller has integrated components of PayPal. PayPal is an online payment service provider. Payments are processed via so-called PayPal accounts, which represent virtual private or business accounts. PayPal is also able to process virtual payments through credit cards when a user does not have a PayPal account. A PayPal account is managed via an e-mail address, which is why there are no classic account numbers. PayPal makes it possible to trigger online payments to third parties or to receive payments. PayPal also accepts trustee functions and offers buyer protection services.

The European operating company of PayPal is PayPal (Europe) S.à.r.l. & Cie. S.C.A., 22-24 Boulevard Royal, 2449 Luxembourg, Luxembourg.

If the data subject chooses "PayPal" as the payment option in the online shop during the ordering process, we automatically transmit the data of the data subject to PayPal. By selecting this payment option, the data subject agrees to the transfer of personal data required for payment processing.

The personal data transmitted to PayPal is usually first name, last name, address, email address, IP address, telephone number, mobile phone number, or other data necessary for payment processing. The processing of the purchase contract also requires such personal data, which are in connection with the respective order.

The transmission of the data is aimed at payment processing and fraud prevention. The controller will transfer personal data to PayPal, in particular, if a legitimate interest in the transmission is given. The personal data exchanged between PayPal and the controller for the processing of the data will be transmitted by PayPal to economic credit agencies. This transmission is intended for identity and creditworthiness checks.

PayPal will, if necessary, pass on personal data to affiliates and service providers or subcontractors to the extent that this is necessary to fulfill contractual obligations or for data to be processed in the order.

The data subject has the possibility to revoke consent for the handling of personal data at any time from PayPal. A revocation shall not have any effect on personal data which must be processed, used or transmitted in accordance with (contractual) payment processing.

The applicable data protection provisions of PayPal may be retrieved under <https://www.paypal.com/us/webapps/mpp/ua/privacy-full>.

Legal basis for the processing in compliance with EU General Data Protection Regulation (GDPR)

Art. 6(1) lit. a GDPR serves as the legal basis for processing operations for which we obtain consent for a specific processing purpose. If the processing of personal data is necessary for the performance of a contract to which the data subject is party, as is the case, for example, when processing operations are necessary for the supply of goods or to provide any other service, the processing is based on Article 6(1) lit. b GDPR. The same applies to such processing operations which are necessary for carrying out pre-contractual measures, for example in the case of inquiries concerning our products or services. Is our company subject to a legal obligation by which processing of personal data is required, such as for the fulfillment of tax obligations, the processing is based on Art. 6(1) lit. c GDPR. In rare cases, the processing of personal data may be necessary to protect the vital interests of the data subject or of another natural person. This would be the case, for example, if a visitor were injured in our company and his name, age, health insurance data or other vital information would have to be passed on to a doctor, hospital or other third party. Then the processing would be based on Art. 6(1) lit. d GDPR. Finally, processing operations could be based on Article 6(1) lit. f GDPR. This legal basis is used for processing operations which are not covered by any of the abovementioned legal grounds, if processing is necessary for the purposes of the legitimate interests pursued by our company or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data. Such processing operations are particularly permissible because they have been specifically mentioned by the European legislator. He considered that a legitimate interest could be assumed if the data subject is a client of the controller (Recital 47 Sentence 2 GDPR).

Collection of Non-Personal Data

If you browse the Website, you do so anonymously. We do not collect your e-mail address or other personal information. We do log your IP address (the Internet address of your computer) to tell us which parts of our Website you visit and how long you spend there. We do not link your IP address to anything personally identifiable; however, we do track the state and/or country you are accessing the Internet from, the date and time you visited and the type of computer, operating system and Web browser you are using. Your browser supplies us with this information. We use this information from our server logs to learn more about our visitors as a group, not about you as an individual. The information helps us identify overall usage patterns and trends on the site.

We may collect non-personal identification information about Users whenever they interact with our Site. Non-personal identification information may include the browser name, the type of computer and technical information about Users means of connection to our Site, such as the operating system and the Internet service providers utilized and other similar information.

Collection and Use of Your Personal Information

Website collects a series of general data and information when a data subject or automated system calls up the website. This general data and information are stored in the server log files. Collected may be (1) the browser types and versions used, (2) the operating system used by the accessing system, (3) the website from which an accessing system reaches our website (so-called referrers), (4) the sub-websites, (5) the date and time of access to the Internet site, (6) an Internet protocol address (IP address), (7) the Internet service provider of the accessing system, and (8) any other similar data and information that may be used in the event of attacks on our information technology systems.

When using these general data and information, Company does not draw any conclusions about the data subject. Rather, this information is needed to (1) deliver the content of our website correctly, (2) optimize the content of our website as well as its advertisement, (3) ensure the long-term viability of our

information technology systems and website technology, and (4) provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack. Therefore, Company analyzes anonymously collected data and information statistically, with the aim of increasing the data protection and data security of our enterprise, and to ensure an optimal level of protection for the personal data we process. The anonymous data of the server log files are stored separately from all personal data provided by a data subject.

We may collect personal identification information from Users in a variety of ways, including, but not limited to, when Users visit our site, register on the site an order and in connection with other activities, services, features or resources we make available on our Site. Users may be asked for, as appropriate, name, email address, mailing address, phone number, Users may, however, visit our Site anonymously. We will collect personal identification information from Users only if they voluntarily submit such information to us. Users can always refuse to supply personally identification information, except that it may prevent them from engaging in certain Site related activities.

As part of the buying and selling process, Company will share your shipping address information to Product Shipper(s) involved in the shipping of your purchase. You may obtain Company Product Shipper's email address, shipping address, payment information, and/or other information. As described in Company 's User Agreement, you have a limited license to use this information only for Company related communications or for Company facilitated transactions. Company has not granted you a license to use the information for unsolicited commercial messages. Without express consent from that person, you must not add any Company member to your email or physical mailing list.

How we use collected information

Website collects and uses Users personal information for the following purposes:

- To process and complete your orders and purchases

We may use the information Users provide about themselves when placing an order only to provide service to that order. We do not share this information with outside parties except to the extent necessary to provide the service (i.e. Product Shippers).

- To communicate with you regarding your purchases
- To send periodic emails

The email address Users provide for order processing, will only be used to send them information and updates pertaining to their order. It may also be used to respond to their inquiries, and/or other requests or questions. If User decides to opt-in to our mailing list, they will receive emails that may include company news, updates, related product or service information, etc. If at any time the User would like to unsubscribe from receiving future emails, we include detailed unsubscribe instructions at the bottom of each email or User may contact us via our Site.

The legitimate interests pursued by the controller or by a third party

Where the processing of personal data is based on Article 6(1) lit. f GDPR our legitimate interest is to carry out our business in favor of the well-being of all our employees and the shareholders.

Period for which the personal data will be stored

The criteria used to determine the period of storage of personal data is the respective statutory retention period. After expiration of that period, the corresponding data is routinely deleted, as long as it is no longer necessary for the fulfillment of the contract or the initiation of a contract.

Provision of personal data as statutory or contractual requirement; Requirement necessary to enter into a contract; Obligation of the data subject to provide the personal data; possible consequences of failure to provide such data

We clarify that the provision of personal data is partly required by law (e.g. tax regulations) or can also result from contractual provisions (e.g. information on the contractual partner). Sometimes it may be necessary to conclude a contract that the data subject provides us with personal data, which must

subsequently be processed by us. The data subject is, for example, obliged to provide us with personal data when our company signs a contract with him or her.

The non-provision of the personal data would have the consequence that the contract with the data subject could not be concluded. Before personal data is provided by the data subject, the data subject must contact any employee. The employee clarifies to the data subject whether the provision of the personal data is required by law or contract or is necessary for the conclusion of the contract, whether there is an obligation to provide the personal data and the consequences of non-provision of the personal data.

How we protect your information

We adopt appropriate data collection, storage and processing practices and security measures to protect against unauthorized access, alteration, disclosure or destruction of your personal information, username, password, transaction information and data stored on our Website. Sensitive and private data exchange between the Site and its Users happens over a SSL secured communication channel and is encrypted and protected with digital signatures.

Third-Party Services

The Website may offer features and services administered or provided by third parties hired by Company. To receive these services, you may be required to provide these third parties with personal information. Generally we do not share your information to third-party services with exceptions mentioned in this Privacy Policy. All such services are subject to separate terms and conditions established by our third-party providers, including separate privacy policies, which may be different than this privacy policy.

When you load a page on the Website that has a social plug-in from a third-party site or service, such as a Like or Send buttons, you are also loading content from that third-party site. That site may request cookies directly from your browser. These interactions are subject to the privacy policy of the third-party site.

Security and secure billing transactions

You are asked to supply certain credit card and billing information in order to pay your Company service charges. That information is transferred, using secure transmission technology to a trusted third party for processing. The information is then encrypted and securely stored to handle your transactions. Except for payment transactions, the Website does not use a secure server to transmit data to and from our site. be sure not to transmit any credit card or other financial or sensitive data through this website unless you have first verified that the data is being submitted to our third-party service provider's secure server.

Messages From Company

As a member, Company may also send you messages related to certain features on the site or your activity. Company may also send you news or updates about changes to our site or services. by default, members will receive these messages via email, but you may choose to opt-out of getting certain emails under your account settings.

Company may offer email newsletters. You must opt-in or subscribe to begin receiving newsletters. Members may subscribe or unsubscribe from optional newsletters under your account settings or by following the instructions contained in the newsletter emails. Non-members may subscribe by providing an email address, which will only be used by Company for these newsletters. Non-members may unsubscribe from newsletters by following the instructions contained in the newsletter emails.

Feedback

Company may ask you to leave your feedback and or opinion about your experience of purchasing goods from the Company. Please use common sense and good judgment when posting feedbacks or sharing your personal information with others on the Website. Be aware that any personal information you submit there can be read, collected, or used by others, or could be used to send you unsolicited messages. Company generally does not remove content from feedback pages, and your posts may stay public until

you request to remove the feedback. You are responsible for the personal information you choose to post in community spaces on the Website.

Data Retention

Company will retain your information for as long as your account is active or as needed to provide you services. If you no longer want Company to use your information to provide you services, you may close your account. Company will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Removing or Updating Personal Information

You may change or correct information at any time. You may remove certain optional information you no longer wish to be publicly visible, such as your feedback message. If you believe your personal information is not accurate, or if you would like us to delete personal information collected by Company through this Website, please contact us at

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Email: euro@westernbid.com

Your acceptance of these terms

By using this Site, you signify your acceptance of this policy and terms of service. If you do not agree to this policy, please do not use our Site. Your continued use of the Site following the posting of changes to this policy will be deemed your acceptance of those changes.

Contacting us

If you have any questions about this Privacy Policy, the practices of this site, or your dealings with this site, please contact us at email at euro@westernbid.com

Western Bid Europe Cookie Policy

Effective Date: May 24, 2018

This policy ("Cookie Policy") forms part of the Western Bid Europe's Privacy Policy. Capitalized terms not otherwise defined in this Cookie Policy have the meaning given to them in the Privacy Policy.

What are cookies?

Cookies are data files containing small amounts of information which are downloaded to the device or browser you use when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website which recognizes that cookie.

Please note that we can also collect information about Service usage from data contained in "log files" from third parties. Log files are not cookies; they do not contain any personal data; and they are not used to identify your personal use of the Service. When you request any web page from the Service, web servers automatically obtain your domain name and IP address, but they reveal nothing personal about you and that data is only used to examine Service traffic in aggregate, to investigate abuse of the Service and its users, and/or to cooperate with law enforcement. Such data is not disseminated to third parties, except in aggregate.

How do we use cookies?

We use cookies in order to ensure our Service functions correctly and to improve our understanding of how you use the Service in order to make improvements. Cookies cannot harm your computer.

What cookies do we use?

Firstly, we explain what each type is and then, in the table below, we have stated which types we actually use.

In general, there are four different types of cookie.

- Necessary cookies: those required for the operation of the Service, which do not gather information about you that could be used for marketing or remembering where you have been on the internet.
- Analytical/performance cookies: these allow us to collect information about how you use the Service, such as, how you move around our website and if you experience any errors. These cookies do not collect personal data. The information collected is anonymous and is only used to help us improve the way the Service works, understand what interests our users generally and measure how effective our advertising is. Some of the performance cookies we use are issued as part of services provided by third parties, like Google Analytics.
- Functionality cookies: these are used to provide services or to recognise you when you return to our website. These would enable us to personalise our content for you, greet you by name and remember your preferences and improve your visit.
- Targeting cookies: these record your visit to the Service, the pages you have visited and the links you have followed. They are linked to services provided by third parties, such as "Like" and "Share" buttons. The third party provides these services in return for recognising that you have visited our website. The third party may subsequently use information about your visit to target advertising to you on other websites and present you with advertisements that you may be interested in.

Where does the cookie originate?

- (a) Customer's authorization and authentication
- (b) Customer's session maintenance
- (c) Customer's preferences maintenance
- (d) Google analytical cookie files

How do I manage my cookie settings?

Please note that configuring your computer and/or mobile browser to reject 'necessary', 'performance' or 'functional' cookies may severely impact your experience on Website and some parts of the Service will not function at all.

All browsers provide tools that allow you to control how you handle cookies: accept, reject or delete them. These settings are normally accessed via the 'settings', 'preferences' or 'options' menu of the browser you are using, but you could also look for a 'help' function or contact the browser provider. If you are unsure as to how to manage your cookies, please refer to setting, help or support section of your web browser: For further information on deleting, disabling or blocking cookies, please visit AboutCookies.org.