

Privacy Policy – Bidpath Ltd (in relation to Saiabid.auctioneering.co.za)

Introduction

Bidpath Limited respects your privacy and is committed to protecting your personal data. This privacy policy details how we look after your personal data as well as your privacy rights and how the law protects you.

This privacy policy aims to give you information on how Bidpath Limited collects and processes your personal data in relation to:

- your use of this website as a visitor, including any enquiries or information you submit to us
- the operation of your Saiabid.auctioneering.co.za account whereby your personal data is collected and then shared with third party auction houses (“**Partner Organisations**”) so that you can participate in online auctions through that Partner Organisation’s site.

This website is not intended for children and we do not knowingly collect data relating to children. Our aim is to only use and hold your personal data in ways that you would reasonably expect us to.

It is important that you read this privacy policy together with any other privacy policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. We reserve the right to amend this privacy policy from time to time. If we amend this privacy policy, we will make you aware of this via updates posted on our website.

Who we are

We are:

Bidpath Limited, based at C/O Sagars Accountants Ltd Gresham House, 5-7 St. Pauls Street, Leeds, West Yorkshire, LS1 2JG, registered with company number 08613187, registration number with the Information Commissioner’s Office ZA397389;

- **Bidpath Inc.**, 26635 AGOURA RD, STE 215, CALABASAS CA 91302 registered with company number C3777244 together the “**Bidpath Group**”.

This privacy policy is issued on behalf of the Bidpath Group, therefore, when we mention “Bidpath”, “we”, “us” or “our” in this privacy policy, we are referring to the relevant company in the Bidpath Group responsible for processing your data.

Bidpath Limited is responsible for this website and we act as a controller. When we share your personal data with a Partner Organisation, that Partner Organisation also acts as a controller. To understand how your personal data is processed by the Partner Organisation, you should refer to any direct communications or privacy notices provided by them or contact that organisation directly.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below:

Bidpath Group
ATTN: Privacy Officer
44(0) 845 163 0584 and/or
DPO@bidpath.com
1 – 5 The Stud Offices
Redenham Park
Andover Hampshire
SP11 9AQ

You have the right to lay a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the opportunity to deal with your concerns before you approach the ICO. Therefore we ask that you contact us first.

It is important that the personal data we hold about you is accurate and current. It is your responsibility to keep us informed if your personal data changes during your relationship with us. This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

Data Subject	Types of Personal Data
Website visitor / user	IP address, e-mail, telephone number, usage data including information about how you use our website, products and services.
Use of Saiabid.auctioneering.co.za account to access online auction services provided by Partner Organisation	<p>Identity data including first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.</p> <p>Contact data including address, email address and telephone numbers.</p> <p>Financial data including bank account and payment card details.</p> <p>Transaction data including details about payments to and from you and other details of products and services you have purchased.</p> <p>Technical data including internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.</p> <p>Profile data including your username and password, purchases or orders made by you.</p>

We do not collect any 'special categories' of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly

identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

How is your personal data collected?

We use different methods to collect data from and about you, including through:

- **Direct interactions.** You may give us your personal data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you make an enquiry in relation to our products or services, give us feedback or contact us
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive data about you if you visit other websites employing our cookies. Please see our cookie policy for further details, and
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:
 - analytics providers (such as Google based outside the EU)
 - providers of technical, payment and delivery services Authorize.net and Paytrace (outside the EU/UK), Sage Pay (inside the EU) and eWAY (AU)
 - Partner Organisations in the course of their performance of a contract with you and in the course of our performance of a contract with that Partner Organisation.

How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you in relation to the services that we are providing to you
- Where it is necessary for our legitimate interests (or those of a third party), and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.
Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

We have tabulated a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Data Subject	Purpose of processing	Lawful basis for processing
Website visitor/user	To assist or improve the individual's use of the website To provide information on our services	Legitimate interests (to administer and protect our business and this website including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data). Consent when the data subject has registered their information with us via our website, email or in person.
Use of Auctionary account to access online auction services provided by Partner Organisation	In order to enable participation in online auctions of Partner Organisations	Performance of contract.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table above.

- Partner Organisations
- Internal third parties such as other companies within the Bidpath Group
- External third parties such as delivery partners, business partners, service providers, professional advisers including lawyers, bankers, auditors and insurers
- HM Revenue & Customs, regulators and other authorities
- Other visitors to the website when you contribute to a public forum
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy
- Any other party where we ask you and you consent to the sharing.
We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal

data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

International transfers

We share your personal data within the Bidpath Group. This will involve transferring your data outside the European Economic Area (EEA). Some of our external third parties are based outside the EEA and their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- The transfer is to a country that has been deemed to provide an adequate level of protection for personal data by the European Commission
- We have entered into specific contracts approved by the European Commission which gives personal data the same protection it has in Europe
- The transfer of data is to an entity located in the US who has signed up to Privacy Shield. This

requires them to provide similar protection to personal data shared between Europe and the US. Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Data retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

Bidpath Group uses cookies and similar tools to improve the performance of the site and enhance your user experience. Cookies are small text files that a website may store on the device you are using (for example, your desktop computer, mobile or tablet) to view website

content. The cookie helps the website, or another website, to recognise your device the next time you visit.

We are permitted to store cookies on your computer if they are essential to the operation of our website. We require your consent to use non-essential cookies on your computer. By consenting to our cookie settings you are consenting to the use of the data collected as set out in this policy. You can stop cookies from being placed on your device. However, this will have an impact on the performance of our website. If you do still wish to know how to disable your cookies, please follow the guidance provided by your internet browser software.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data’s accuracy
- Where our use of the data is unlawful but you do not want us to erase it
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, you must make the request in writing to our Data Protection Officer. Please note some of these rights are restricted in some circumstances.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

South African Institute of Auctioneers Privacy policy link
(www.auctioneering.co.za/8888/privacy_policy/)