

Privacy Policy

Andrew Smith & Son ("We") are committed to protecting and respecting your privacy.

This policy (together with our terms and conditions - which are available on our website www.andrewsmithandson.com or on request - and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting our website, you are accepting and consenting to the practices described in this policy.

For the purpose of the Data Protection Act 2018 (the Act), the data controller is Andrew Smith & Son of Winchester Auction Rooms, Itchen Stoke, Alresford, Hampshire, SO24 0QT.

Andrew Smith & Son is the trading name of Andrew Smith & Son (Winchester Auction Rooms) Ltd. Registered in England & Wales Company Number 07146270 Registered Office: 6B St Thomas Street, Winchester, SO23 9HE.

Information we may collect from you

We may collect and process the following data about you:

- **Information you give us.** You may give us information about you by filling in forms on our website or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use our site, subscribe to our service, participate in discussion boards or other social media functions on our site, enter a competition, promotion or survey and when you report a problem with our site. The information you give us may include your name, address, e-mail address and phone number, financial and credit card information, personal description and photograph. Calls to and from our office number 01962 735988 are recorded and we have CCTV in our salerooms.
- **Information we collect about you.** Whenever you visit our website, we may automatically collect the following information:
 - technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform,
 - information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.
- **Information we collect from you.** If you register with us as a buyer or seller at auction, we may collect the following information:
 - personal identifiers, contacts and characteristics (for example, name, address, telephone numbers, email addresses, date of birth, gender),

- documents to prove identity in line with Anti-Money-Laundering regulations (for example, driver's licence, passport, utility bill or bank statement),
- bank account details for payment of sale proceeds.

Information we receive from other sources. We may receive information about you if you use any other websites we operate or other services we provide. In this case we will have informed you when we collected that data that it may be shared internally and combined with data collected on our site. We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and allows us to improve our site. There are instances where we may use cookies to gather information regarding our services in a mathematical collection for our website and our advertisers.

Any information collected will not have any identifying data. It is statistical data about our visitors and how they have used our site. No personal details will be shared that could identify you.

We may assemble information about your common internet use with a cookie file. When used, the cookies are downloaded to your computer automatically. The cookie is stored on the hard drive, with transferred information. The data sought by the cookie helps us improve our website and any service offered to you.

Your browser can decline cookies. This is done by setting your browser options to decline all cookies. Note: if you do decline the download of cookies, some aspects of our site may not work or allow you access.

Our advertisers may download cookies to which we have no control. If used, these cookies are downloaded by clicking on an advertisement found on our website.

Uses made of the information

We use information held about you in the following ways:

Information you give to us. We will use this information:

- to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us,
- to notify you about changes to our service,
- to ensure that content from our site is presented in the most effective manner for you and for your computer.
- to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about,
- to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. If you are an existing customer, we will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale or negotiations of a

sale to you. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this.

You have the right to ask us not to process your personal data for marketing purposes. We will ask for your consent (before collecting your data) to use your data for such purposes. You opt-in to such activities but can exercise your right to prevent further processing by opting out at any time by contacting us at auctions@andrewsmithandson.com, or by using the 'unsubscribe' link at the bottom of any of our marketing emails.

Information we collect about you. We will use this information:

- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes,
 - to improve our site to ensure that content is presented in the most effective manner for you and for your computer,
 - to allow you to participate in interactive features of our service, when you choose to do so,
 - as part of our efforts to keep our site safe and secure,
 - to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you,
 - to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.
- **Information we receive from other sources.** We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

Disclosure of your information

We may share your information with selected third parties including:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with [them or] you (for example Mailchimp, for the purposes of maintaining and operating our marketing mailing list – where you have opted in to receive marketing emails from us, and Easylive Auctions – who provide and maintain our back-office systems and website),
- Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users (for example, we may inform them that 100 women aged over 40 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in SO21). We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience,
- Analytics and search engine providers that assist us in the improvement and optimisation of our site,

- Credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you,
- Meta Retargeting. Andrew Smith & Son uses, through its website, the Meta retargeting service to advertise on Facebook and Instagram to previous visitors to our website. Meta retargeting is a retargeting and behavioural targeting service provided by Meta. Meta retargeting displays relevant advertisements to you based on pages of our website that you have viewed by placing a cookie on your computer. This cookie does not identify you or give us access to your computer. The cookie allows us to show you relevant advertisements across the Meta Network based on your previous browsing of our website. Any data that we collect will be used in accordance with this Privacy Policy and Meta's retargeting privacy policy.

We may disclose your personal information to third parties:

- If Andrew Smith & Son or substantially all its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets,
- 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 our terms and conditions and other agreements; or to protect the rights, property, or safety of Andrew Smith & Son, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Where we store your personal data

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. Andrew Smith & Son will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted [using SSL technology]. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

You should understand that we use a third-party payment processor to process and manage the storage of users' payments details, in a PCI DSS compliant manner, allowing payments to be taken by Auction Houses. The third-party payment processor is committed to protecting the users' information.

By registering for an auction and providing your card details you agree to authorise the auctioneer to charge the card for items purchased at auction via our website, including all additional fees.

Removing a card from your account will remove the option to use the card straight away, but it can take up to 30 days for the card to be removed completely from the payment processor's storage. This is to allow the auctioneer to take payments after an auction for any outstanding lots.

Hard copies of data collected will be securely stored only for as long as is necessary to fulfil our contractual obligations to you and/or comply with our legal/regulatory responsibilities. It will then be securely destroyed on site by a fully accredited third-party secure data destruction company (currently Restore Datashred).

Protecting Auctioneers

To ensure the protection of all parties we work with from any form of illegal, unfair, or inappropriate behaviour, we take practical measures. This involves keeping track of account activities, including user contact information, device usage, website activity, bidding history, purchase records, and payment history. This information is shared with other relevant partners, such as auctioneers, to assist parties in managing their commercial risks in the context of our joint services.

In the event that behaviour is deemed inappropriate or presents a threat, we reserve the right to temporarily halt automatic approvals. In such cases, you will need to directly communicate with the auctioneer to participate in their auction.

Your rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at Andrew Smith & Son, Winchester Auction Rooms, Itchen Stoke, SO24 0QT, 01962 735988, auctions@andrewsmithandson.com if you wish to make a request.

You have the right to ask us not to process your personal data for marketing purposes. We will ask for your consent (before collecting your data) to use your data for such purposes. You opt in to such activities, but can exercise your right to prevent further processing by opting out at any time by contacting us at auctions@andrewsmithandson.com, or by using the 'unsubscribe' link at the bottom of any of our marketing emails

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to auctions@andrewsmithandson.com.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at catherine@andrewsmithandson.com.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>