

# Privacy Policy

## AR DIRECT PRIVACY POLICY

Protecting your privacy is important to us. This AR DIRECT Privacy Policy ("Privacy Policy") describes your privacy rights regarding Auction Solutions, Inc 's ("AR DIRECT" or "we") collection, use, storage, sharing, and protection of your personal information from your use of AR DIRECT. This Privacy Policy applies to the AR DIRECT website and all related sites, applications, services and tools where this policy is referenced, regardless of how you access or use them.

### **Scope and Consent**

By visiting the AR Direct website and its related sites, application, services and tools, and/or registering for an AR Direct account, you expressly consent to our collection, use, disclosure, and retention of your personal information as described in this Privacy Policy and in our User Agreement.

Throughout this Privacy Policy, we use the term "personal information" to describe information that can be associated with a specific person and could be used to identify that person, such as your name, address, email address, or phone number, and that is not otherwise publicly available. We do not consider personal information to include information that has been made anonymous or aggregated so that it can no longer be used, whether in combination with other information or otherwise, to identify a specific person.

We may amend this Privacy Policy at any time by posting the amended terms on this site. All amended terms automatically take effect immediately upon posting to the site. Your continued use of this website constitutes your agreement to this Privacy Statement and any updates.

### **Children's Privacy**

The AR DIRECT website is a general audience website, and it and its related sites, applications, services, and tools are not intended for children under the age of 18. We do not knowingly collect personal information via our websites, applications, services, or tools from users in this age group.

### **Information We Collect**

When you browse the AR Direct website and have not registered for any online service from AR Direct, you browse anonymously. Personal information such as your name, address, phone number or email address is not collected as you browse. When you visit our sites, use our applications, services, and tools, or interact with our advertising or content, we automatically collect information

sent to us by your computer, mobile device, or other access device including, but not limited to: device ID, geographic location, computer connection information, IP address, referral URL, ad data, and anonymous information collected through our use of cookies, etc. Personal information, including the information above, is associated to your account only when you sign in as an AR Direct registered user. If you register for an account with us, you give us your personal information, and you are not anonymous to us. If you choose to provide us with personal information, you consent to the transfer and storage of that information on our servers located in the United States.

We collect and store personal information in order to provide you with the use of and access to our sites, applications, services and tools, and to help us personalize and improve your experience, including but not limited to:

- information you provide us when you register for an account, including name, address email address, and phone number;
- depending on the service used, we may require financial information, such as bank account number, routing number, credit card number, or credit card expiration date;
- transactional information based on your activities on the sites (such as bidding, buying, selling, item and content you generate or that relates to your account);
- shipping, billing and other information you provide to purchase or ship an item;
- information provided in the context of dispute resolution, correspondence through our site, or correspondence sent to us; and
- additional personal information we ask you to submit to authenticate yourself, for example, we may ask you to send us an ID or bill to verify your address, or to answer additional questions online to help verify your identity or ownership of an item you list).

We may also receive or collect supplemental information about you from third parties sources and add it to our account information. This may include, but is not limited to, demographic, navigation information, additional contact information, credit check information, and additional information about you from credit bureaus or other sources, as permitted by law.

### **Our Use of Your Personal Information**

Our primary purpose in collecting personal information is to provide you with access to our sites and/or use of our services, applications and tools and to provide you with a safe, smooth, efficient, and customized experience. You agree that we may use your personal information to:

- provide you access to our sites and the services and customer support you request;
- prevent, detect, and investigate, fraud, security breaches, potentially prohibited or illegal activities, and enforce our User Agreement;
- customize, measure and improve our services, content and advertising;

- contact you, either via email or telephone, to resolve disputes, collect fees, and troubleshoot problems with your account or our sites, services, applications or tools, or for other purposes authorized by law;
- contact you, either via email or telephone to inform you about our services and those of our corporate family, deliver targeted marketing, service updates, and promotional offers based on your communication preferences;
- compare information for accuracy, and verify it with third parties; and
- provide you other services requested by you as described when we collect the information.

### **International Visitors and Customers**

This web site is hosted in the United States. If you are visiting from other regions with laws governing data collection and use that may differ from U.S. law, please note that you are transferring your personal data to the United States which does not have the same data protection laws as other regions and by providing your personal data you consent to (i) the use of your personal data for the purposes identified above in accordance with this privacy policy, and (ii) the transfer of your personal data to the United States as indicated above.

### **Marketing**

We do not sell or rent your personal information to third parties for their marketing purposes without your explicit consent. We may combine your information with information we collect from other companies and use it to improve and personalize our services, content and advertising. If you do not wish to receive marketing communications from us, you may change your account preferences or notify us and opt-out of such communications, as applicable.

### **Our Disclosure of Your Information**

We may disclose personal information to respond to legal requirements, enforce our policies, respond to claims that a listing or other content violates the rights of others, or protect anyone's rights, property, or safety. Such information will be disclosed in accordance with this Privacy Policy and applicable laws and regulations. As stated above, we do not disclose your personal information to third parties for their marketing purposes without your explicit consent.

We may also share your personal information with:

- Members of the AR DIRECT company family, including but not limited to the Automotive Recyclers Association ("ARA"), to provide joint content and services (such as registration, transactions, and customer support), to help detect and prevent potentially illegal acts, violations of our policies, fraud and/or data security breaches, and to guide decisions about their products, sites, applications, services and tools, and communications. Members of our corporate family will use this information to

send you marketing communications only if you have requested their services and will use your personal information in compliance with their Privacy Policy and our global privacy standards.

- Service providers under contract who help with our business operations (such as, but not limited to, fraud investigations, bill collection, affiliate and rewards programs, site operations, and credit cards).
- Financial institution partners of the AR DIRECT corporate family members who offer financial products to provide joint content and services (like registration, transactions and customer support), to help detect and prevent potentially illegal acts, violations of our policies, fraud and/or security breaches, and to guide decisions about their products, websites, applications, services and tools, and communications. These third party financial institution partners will use this information to send you marketing communications only if you have requested their services and will use your personal information in compliance their respective privacy policies and consistent with this Privacy Policy.
- Other AR DIRECT users, whether located in your country of residence or outside of your country of residence, as authorized by you or your use of our sites, services, applications or tools. For example, where you are involved in a transaction with another user, the other user may view your email address and request and obtain your contact information and postal address to help complete the transaction.
- Other third parties to whom you explicitly ask us to send your information (or about whom you are otherwise explicitly notified and consent to when using a specific service).
- Law enforcement, governmental agencies, or authorized third-parties, in response to a verified request relating to a criminal investigation or alleged illegal activity or any other activity that may expose us, you, or any other AR DIRECT user to legal liability. In such events, we will only disclose information relevant and necessary to the investigation or inquiry, such as name, city, state, ZIP code, telephone number, email address, User ID history, IP address, fraud complaints, bidding and listing history, and anything else we may deem relevant to the investigation.
- Credit bureaus with which we may report information about your account as we in our sole discretion believe necessary or appropriate in connection with an investigation of fraud, intellectual property infringement, piracy, or other unlawful activity. In such events, we will disclose name, street address, city, state, ZIP code, country, phone number, email address and company name.
- Other business entities, should we plan to merge with or be acquired by that business entity. (Should such a combination occur, we will require that the new combined entity follow this Privacy Policy with respect to your personal information. If your personal information will be used contrary to this Privacy Policy, you will receive prior notice.).

Without limiting the above, in an effort to respect your privacy and our ability to keep the community free from bad actors, we will not otherwise disclose your personal information to law enforcement, other government officials, or other third parties without a subpoena, court order or substantially

similar legal procedure, except when we believe in good faith that the disclosure of information is necessary to prevent imminent physical harm or financial loss or to report suspected illegal activity.

### **Information You Share on AR DIRECT**

Your User ID is connected to all of your AR DIRECT activity and displayed throughout AR DIRECT, for example when you bid on or purchase items. Other people can see your bids, purchases, items for sale, storefronts, feedback, ratings and associated comments. Notices sent to other community members about suspicious activity and policy violations on our sites may refer to User IDs and specific items. If you associate your name with your User ID, the people to whom you have revealed your name will be able to personally identify your AR DIRECT activities.

If you access AR DIRECT from a shared computer certain information about you, such as your User ID, activity, or reminders from AR DIRECT, may also be visible to other individuals who use the computer after you.

### **Using Information from AR DIRECT**

AR DIRECT enables you to share personal and financial information to complete transactions and collect payments. We cannot guarantee the privacy or security of your information and therefore we encourage you to evaluate the privacy and security policies of your trading partner before entering into a transaction and choosing to share your information. When users are involved in a transaction, they may have access to each other's name, User ID, email address and other contact and shipping information. You agree to use user information only to use services offered through AR DIRECT (such as shipping and fraud complaints and AR DIRECT transaction-related purposes. You agree NOT to use AR DIRECT user information to transmit unsolicited commercial messages.

### **About Cookies**

When you access our websites, or use our applications and/or services and tools, we may place small data files on your computer or other device, known as "cookies". We use cookies to help us identify you as a user, analyze our web page flow, customize our services, content and advertising, and to measure promotional effectiveness. We offer certain features that are available only through the use of cookies. Most cookies are "session cookies" that are automatically deleted when you end your session or close your browser. Some cookies, "persistent cookies", remain on your device until you erase them or they expire. You are always free to decline cookies if your browser permits, although doing so may limit your use of our websites, applications, and/or services and tools.

We do not control the use of cookies by third parties. You may encounter cookies from third parties, known as service providers, which we have allowed on our site that assist us with various aspects of

our web site operations and services. You also may encounter cookies from third parties on certain pages of the websites that we do not control and have not authorized.

### **Control of Your Personal Information**

Your password is the key to your account and you should not disclose your AR DIRECT password to anyone. We do not recommend that you disclose your AR DIRECT password to any third parties. If you do share your password or your personal information with others, you are responsible for all actions taken in the name of your account, including fees charged to your account. If you lose control of your password, you may lose substantial control over your personal information and may be subject to legally binding actions taken on your behalf. Therefore, you should immediately notify AR DIRECT at [info@ar.direct](mailto:info@ar.direct) if your password has been compromised for any reason and change your password.

You can see, review and change most of your personal information by signing on to AR DIRECT. Generally, we will not manually modify your personal information because it is very difficult to verify your identity remotely. You must promptly update your personal information if it changes or is inaccurate. Once you make a public posting, you may not be able to change or remove it. Upon your request, we will close your account and remove your personal information from view as soon as reasonably possible, based on your account activity and in accordance with applicable law.

### **Data Storage**

We do retain personal information from closed accounts to comply with law, prevent fraud, collect any fees owed, resolve disputes, troubleshoot problems, assist with any investigations, enforce our User Agreement, and take other actions otherwise permitted by law. We retain information as long as it is necessary and relevant for our operations.

### **Security**

We store and process your personal information on our computers in the United States. We protect your information using technical and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure and alteration. However, no data transmission over the Internet can be guaranteed to be 100% secure. We employ many different security measures to safeguard your personal information, which may include firewalls and data encryption, physical access controls to our data centers, and information access authorization controls. While we strive to protect your personal information, we cannot ensure or warrant the security of such information. If AR DIRECT learns of a security breach, we may attempt to notify you so you can take appropriate protective measures.

**Third Parties**

Except as otherwise expressly included in this Privacy Policy, this document addresses only the use and disclosure of information AR DIRECT collects from you. If you disclose your information to others, whether they are bidders, buyers or sellers on our sites or other sites throughout the internet, different rules may apply to their use or disclosure of the information you provide to them. AR DIRECT does not control the privacy policies of third parties, and you are subject to the privacy policies of those third parties where applicable.

**Questions and Suggestions**

If you have questions or suggestions, please contact us at: [info@ar.direct](mailto:info@ar.direct).