

Sybil Art Business Management Platform

Privacy Policy

Effective Date: 17 October 2024

SCOPE

Welcome to the Sybil Art Business Management Platform companies. This is the Privacy Policy of Sybil Art Business Management & Consulting Ltd., Sybil Art Business Management & Consulting – PLATFORM publishes this Privacy Policy to let you know how we collect, use, and disclose your personal information in the course of operating our business. It also describes your rights in relation to this information. In some circumstances, such as for certain events, we may provide additional information regarding our data practices. This Privacy Policy applies to any Sybil Art Business Management & Consulting – PLATFORM service, event, website, mobile application or other digital or non-digital service, and any hard copy (paper) form which provides a link to or refers to this Privacy Policy.

If you register with or transact on any of our apps or website the relevant privacy policy will be linked to on such sites.

For those who reside in the United Kingdom, Switzerland or the European Economic Area, please see the end of this Policy for additional information regarding our practices. For California and Virginia residents, please see the section titled “Additional Information for California and Virginia Residents”.

If you reside in mainland China or transact or consign there or use any of our Chinese apps, website or digital properties, please see the section below titled “Additional Information for China Customers” for additional information that applies to you.

INFORMATION SYBIL ART BUSINESS MAGNAGEMENT & CONSULTING – PLATFORM COLLECTS ABOUT YOU

Personal information is information, or a combination of pieces of information, that could reasonably allow you to be identified. As described in more detail below, we collect personal information about you from a variety of sources, including information we collect from you directly, information we collect about you from other sources, and information we collect automatically from you.

Information We Collect Directly From You

We collect information that you submit to us face to face, over the telephone, on a paper form, by email or online or provide to us on forms available on third party websites. The types of information that we collect directly from you include: personal details (e.g., name, date of birth, alias and/or avatar alias), contact details (e.g., phone number, email address, postal address), transaction information (e.g., bidding or purchase records, shipping details, information about items you purchase or wish to sell or consign), details about your collection, financial information (e.g., tokenized payment information in connection with your purchases, wire instructions, bank account or bank transfer details, digital wallet details and address), username and password, user ID, unique device ID, information on forms required for certain transactions (e.g. social security number), insurance details, and identification information (e.g. photo ID and proof of address).

We rely on the information you provide to us or that we collect or observe about your individual interactions with us, for example, if you attend a live event, sell or consign property, participate in one of our auctions or sales, become a client, register or bid online.

Information We Collect From Other Sources

We may collect information about you from external sources, including social media sites and data supplementation services. The types of information we collect about you from other sources include your public profile information, family relationships, organizational affiliations, results of verification checks, nature of your connection to an organisation, your source of wealth, whether

you are subject to sanctions, a PEP or a family member or close associate of a PEP. We may work to expand our customer base by acquiring names, contact data, financial information, affiliations, and demographic information from other sources such as private companies, public registers, and social media sites, where permitted by law. We may also generate information such as appraisals, profiles, and a history of our relationships with you based on the information you have provided or that we have obtained from other sources, as permitted under applicable law.

Information We Collect Automatically

We may make video recordings of our auctions (including for security reasons and to monitor bidding), gallery spaces, and certain live events.

Live streaming of our auctions and certain events is available on our websites and on social media for certain auctions. Cameras and microphones recording images and sounds for live streaming focus primarily on auctioneers, presenters and our specialists but it is possible that background sound and images may be captured.

We use CCTV at our sales rooms and offices for the protection of our staff, our visitors and the property we sell.

We record calls made to our customer care and telephone bidding lines for quality assurance, compliance purposes, and recordkeeping purposes.

We may use common data collection technologies as you visit our websites or apps or interact with our emails. For example:

- Our logs gather date, time, information about your browser and system or device configuration, information about how you interact with our digital properties, and an IP address for all visitors to our sites.

- If you have registered with us online, we use data collection technologies to collect information that indicates your individual interests in our websites,

online platforms and apps, and your response to our emails and marketing campaigns.

– The Cookies and similar technologies on our digital platforms can also read and collect data about your browsers as you visit and interact with those platforms: please read our **Cookie Policy** for more detailed information about what cookies are, what kinds are used on our sites, and what choices you have. As described further in our **Cookie Policy**, we use these technologies to enable you to use our digital platforms, learn how you and others interact with our digital platforms, personalize the content on our digital platforms, and to deliver advertising based on your interests, including those inferred from your activities over time and across digital platforms operated by us and others.

– In general, our app will communicate data you provide about yourself, for example, registration, purchase, or bidding data, to our databases and systems. An app may, however, rely on other data collection technologies to recognize the device you use for viewing and to personalize your experience. If our app relies on additional data collection technologies that collect or use data about individual users, we will include additional notice either within the app or in a policy that accompanies it.

– We also use and allow certain other companies to use technologies that are similar to cookies (for example pixels and gifs) when we send you emails.

HOW SYBIL ART BUSINESS MANAGEMENT & CONSULTING – PLATFORM USES INFORMATION ABOUT YOU

Sybil Art Business Management & Consulting – PLATFORM uses data about you for the following purposes, as permitted by applicable law:

– To provide you with the requested services. For example, bidding, selling, valuation, storage, shipping, loans and loan referral, restoration and expert advice.

– To manage and assure the integrity of our auctions.

- To on-board you as a client, verify your identity and sources of wealth and to satisfy us know your client obligations, to enter into and fulfil contracts with you, to fulfil your orders and purchases, facilitate sales or consignments, provide the publications, catalogues, and information you request, to manage your account, enquiries and requests and your relationship with us.
- To identify products, services, and offers you may be interested in based on your transactions and interactions with us, including but not limited to consignments, bidding histories, payment histories and events attended.
- To where you consign or sell property with us, advertise and sell your property on any of our international and country specific apps, websites and digital properties.
- To send you information about upcoming auctions, events, types of property and content that you may be interested in.
- To improve and personalize based on your inferred interests from our website and services.
- To match online ads to your interests, arrange for Sybil Art Business Management & Consulting – PLATFORM and other companies’ ads to reach you after you have left our sites, and help advertisers show you ads that are more relevant to your interests.
- To expand our online audiences.
- To provide, maintain, and protect our digital offerings.
- To monitor the performance of our websites, apps and digital properties and improve your user experience.
- To satisfy legal obligations and compliance requirements under laws and regulations applicable to Sybil Art Management Platform Ltd. For example, know your client, to check and verify your identity and to protect against the

risk of fraud and to detect and prevent money laundering or other financial crime.

- To carry out anti money laundering checks, risk screening, crypto wallet and transaction screening and monitoring and blockchain analytics.

- To create and maintain records of art objects to assist us (and in the case of our public records including our online lot pages and online and printed catalogues to assist the public) with checks on authenticity, provenance, title and object value and to prevent fraud, theft or other unlawful activities.

- To provide you (where required) with a digital wallet to enable you to receive an NFT that you have purchased.

- To identify an alternative third-party auction or sale house where your property does not meet our requirements or is not suitable for consignment with or sale by us. In the event you choose to consign or sell your property with such third-party auction or sale house such third party will provide us with details of any sale to enable us to confirm and audit any introductory commission that may be due to us.

- To protect and defend our rights and property, you, or third parties.

- To keep you, our staff and property on our premises secure.

- To comply with legal obligations and regulations to which Sybil Art Business Management & Consulting - PLATFORM is subject and cooperate with regulators, other appropriate agencies or authorities and law enforcement bodies, both within your jurisdiction and internationally.

- To develop, improve and test certain of our products and services.

- To monitor the use of our services, train our staff and improve your client or your user experience. For example, through survey or market research.

– For other purposes that we tell you about specifically when you register or provide data about yourself to us.

HOW SYBIL ART BUSINESS MANAGEMENT & CONSULTING – PLATFORM DISCLOSES INFORMATION ABOUT YOU

Your personal information will be processed by the Sybil Art Business Management & Consulting – PLATFORM and TUISCO BV (<https://www.tuisco.com/>). We also share information within the Sybil Art Business Management & Consulting – PLATFORM, TUISCO BV (<https://www.tuisco.com/>) and the Galleries and Collectors who are our direct subscribed clients for the purposes set out in this privacy policy.

Sybil Art Business Management & Consulting – PLATFORM may disclose personal information to other companies or entities as follows:

– To business partners and vendors that work on our behalf to provide services such as property shipments, mailings, customer account and technology support, secure payment processing, experts who help us authenticate or value your property, fraud prevention, digital marketing Sybil Art Management & Consulting - PLATFORM, and data and property storage or warehousing.

– To our auction or sales partners in association with auctions or sales. For example, when we offer auctions or sales with our group or third-party partners, we may share auction or sale related data with those partners subject to the privacy policy or policies made available to you when registering for or bidding in association with the auctions or sales.

– To consigners, sellers, buyers, customs authorities and others as needed to facilitate a consignment, sale or purchase, including to arrange the collection, delivery or shipment of property.

– To organizations we partner with to host events and those who are involved in such events such as caterers and the event venues.

- To digital wallet and cryptocurrency providers as required to complete your sale or purchase. Please see their privacy policies for details of how they use your personal information. One such provider is Circle Internet Financial, LLC ("Circle") that provides payment processing services on Sybil Art Business Management & Consulting – PLATFORM. Note that as part of the process of minting NFTs, your digital wallet details will be made available on the public blockchain to enable the NFT to be made available to you and will be a permanent record of the transaction, along with the details of the NFT's you purchase.
- To the payment provider on our PLATFORM is **Stripe** (<https://stripe.com/>)
- To the escrow service provider is TUISCO BV (<https://www.tuisco.com/>).
- To law enforcement or other entities that present valid legal process or in our discretion, unless otherwise prohibited by law, to protect human safety, our rights, or the rights of others.
- To meet certain legal compliance requirements, for example under anti-money laundering laws or customs laws and regulations.
- To US, UK, EU, Asian and other domestic and overseas regulators, law enforcement agencies and authorities and other appropriate agencies or authorities in connection with their duties, such as preventing, investigating or detecting crime or to conduct money and trade sanction checks and to meet our compliance, legal and health and safety obligations.
- To identity checking and verification, AML, fraud and risk screening services, including for sanctions and/or negative media purposes.
- To an alternative third-party auction or sale house where your property does not meet our requirements or is not suitable for sale by us to identify if you would like to consign or sell certain items with such third party.

As part of a sale, merger, liquidation, or transfer of our business assets.

– We may share information with digital advertising and analytics firms so that they may recognize your devices and deliver interest-based content and advertisements to you. The information we share may include your name, postal address, email, device ID, or other identifier. These firms may collect additional information from you, such as your IP address and information about your browser or operating system; may combine information about you with information from other companies in data sharing cooperatives in which we participate; and may place or recognize their own unique cookie on your browser. To learn about certain choices, you may have with regard to such sharing, please see our [Cookie Policy](#) or [click here](#).

– We may disclose information about you to Sybil Art Business Management & Consulting – PLATFORM, a company outside of the Sybil Art Business Management & Consulting – PLATFORM a business partner that we coordinate our activities with from time to time

YOUR CHOICES

You have a choice about and control over:

– **Receiving marketing messages from us.** We may contact you by email, text, or SMS messaging. You may stop email marketing by using the “opt out,” or “unsubscribe” mechanism at the bottom of our email marketing messages. In most cases, we will give you a choice about stopping just one kind of email or opting out of all email marketing from us.

– **Whether cookies can be set or read on your browser.** You can learn more about controlling cookies placed on your device as you visit our sites in our [Cookie Policy](#).

– **Whether your account is up to date.** You may review and edit the personal information that is stored in your user account on our website (e.g., your passwords and other contact information) by visiting the “Profile” area of your account on our website or by contacting Sybil Art Business Management & Consulting – PLATFORM via the email address at the end of this Policy. We

will endeavour to respond to your request as soon as practicable. Before we are able to provide you with any information, correct any inaccuracies, or delete any information, however, we may ask you to verify your identity and to provide other details to help us to respond to your request.

–Your public profile on Sybil Art Business Management & Consulting – PLATFORM Metaverse and Metaverse notifications. Details of your bidding activity, your collection (i.e. any lots you have won) and your saved items (i.e. saved lots) will be displayed in your public profile on Sybil Art Business Management & Consulting – PLATFORM Metaverse if you are a Metaverse user. These details will be publicly available unless you change your settings. You will also receive notifications regarding saved items and items you have bid on. You can go to your Settings on Metaverse to change your settings in respect of the information that will be displayed as part of your public profile and the notifications you receive in relation to the Metaverse at any time.

INFORMATION SECURITY AND STORAGE

Sybil Art Business Management & Consulting – PLATFORM is a global company. We receive data collected locally by members of the Sybil Art Business Management & Consulting – PLATFORM and collect data online directly from individuals in countries around the world. Sybil Art Business Management & Consulting – PLATFORM may in the normal course of its business transfer your personal information internationally to Sybil Art Business Management & Consulting – PLATFORM salesrooms, offices and representatives, and to other organisations who need to process your data in connection with the services that Sybil Art Business Management & Consulting – PLATFORM provides. We may process that data on servers globally. Your data will also be held on our servers in the USA. We have put recognized protections in place for the transfer of data from members of the Sybil Art Business Management & Consulting – PLATFORM in the UK and EEA to regulate the processing of personal data outside of these countries.

We protect your information using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure, and alteration. Please be aware, though, that no security measures are perfect or impenetrable. You remain responsible for protecting your username and password and for the security of information you transmit to us over the Internet.

We will keep your personal information for as long as we have a relationship with you. Once our relationship with you has come to an end, we will retain your personal information for a period of time that enables us to:

- Maintain business records for analysis and/or audit purposes.
- Comply with record retention requirements under the law or other relevant legal or regulatory requirements.
- Defend or bring any existing or potential legal claims.
- Deal with any complaints regarding the services.
- Preserve historical records of transactions and property.

We will delete your personal information when it is no longer required for these purposes.

CHILDREN’S DATA

Our websites are directed to adults. We do not accept children as clients or knowingly collect data about them.

THIRD PARTY WEBSITES

Our websites may contain links to other websites not owned or controlled by Sybil Art Management & Consulting - PLATFORM. Those websites may collect information about you. Sybil Art Business Management & Consulting – PLATFORM is not responsible for their practices or content.

Additionally, we may work with auction partners so that you can bid on Sybil Art Business Management & Consulting – PLATFORM items from other sites or platforms. If you participate in an online auction on another company’s site

or platform, please note that those companies may transfer data about you to us to fulfil successful bids and that we may use that data in a manner consistent with this Policy. Please note that if you use another company's auction site, you should review the posted privacy policy applicable to that site.

Your Rights

You may ask us if you have questions about the data, we hold on you. Under certain circumstances, subject to local law requirements, you may have rights under data protection laws applicable to your personal data. These may include a right to a copy of your personal information, to correct it, erase it, restrict our use of it, or to transfer it to other organizations at your request subject to local law. You may also have rights to object to some processing and, where we have asked for your consent to process your data, to withdraw this consent. Please contact us at info@sybilart.com if you wish to exercise any of the rights that apply to you and your personal data.

For residents of:

- California or Virginia please see the section below titled “Additional Information for California and Virginia Residents”
- EU, UK and Switzerland please see the section below titled “Additional Information for EEA, UK and Switzerland Customers”; and
- China please see the section below titled “Additional Information for China Customers”₂

for more information about your privacy rights.

HOW TO CONTACT US

For questions about this Privacy Policy please email us at info@sybilart.com or contact:

Sybil Art Management & Consulting - PLATFORM
Lange Koepoorstraat 64.
2000 Antwerp
Belgium

ADDITIONAL INFORMATION FOR CALIFORNIA AND VIRGINIA RESIDENTS

We may collect the following categories of personal information from and about you:

- **Identifiers:** Such as your name, email address, phone number, IP address, device identifier, online identifier, client number and government-issued identification numbers you provide.
- **Internet activity:** Such as browsing history, search history, content or items viewed, account logins, and interactions with emails, digital ads, and other communications.
- **Transactions:** Such as bidding and purchase records, items considered for purchase or bidding, items offered for consignment, shipping details, and events attended.
- **Payment information:** Such as tokenized payment information or wire instructions.
- **Demographics:** Such as information about your gender or age.
- **Location information:** Such as the addresses you provide or your general location as inferred from your IP address or other network information.
- **Professional and employment information:** Such as information provided on valuation or credit documents.
- **Video and audio:** Such as recordings of auctions or client service calls.
- **Inferences:** Such as our assessment of the types of art, furniture, objects or jewellery in which you may have an interest.

We collect information that may be considered sensitive under applicable laws, such as government identification numbers, login credentials for your Sybil Art Business Management & Consulting – PLATFORM account, precise geolocation, race or ethnic origin, religion, mental or physical health, sexual orientation, citizenship, or immigration status. We process such information only for those purposes expressly permitted under the European Union law.

We do share personal information with third parties in exchange for marketing and analytics services that help us run our business. And we do disclose personal information for targeted advertising.

We collect and disclose all such information for the following business purposes:

- To fulfil your orders and purchases, facilitate consignments, provide the services, publications, catalogues, and information you request, and manage your account, enquiries and requests and to manage your relationship with us.
- To send you information about upcoming events and content that you may be interested in. However, we do not use or disclose payment information for such purposes.
- To improve and personalize our website and services based on your inferred interests.
- To match online ads to your interests, arrange for Sotheby's and other companies' ads to reach you after you have left our sites, and help advertisers show you ads that are more relevant to your interests. However, we do not use or disclose race, ethnic origin, religion, mental or physical health, sexual orientation, citizenship, or immigration status for such purposes.
- To obtain services such as item shipments, mailings, customer account and technology support, secure payment processing, fraud prevention, digital marketing Sybil Art Management & Consulting - PLATFORM, and data storage.

- To expand our online audiences.
- To provide, maintain, and protect our digital offerings.
- To check and verify your identity and to protect against the risk of fraud and to detect money laundering or other financial crime.
- To carry out anti money laundering checks, risk screening, crypto wallet and transaction screening and monitoring and blockchain analytics.
- To provide you (where required) with a digital wallet to enable you to receive an NFT that you have purchased.
- To protect and defend our rights and property, you, or third parties.
- To coordinate auctions with business partners.
- To coordinate events.
- For legal and compliance purposes.
- To cooperate with law enforcement or other reasonable requests for information.
- To support potential sales, mergers, liquidations, or transfers of our business assets.

· For other purposes that we inform you about specifically when you register or provide data about yourself to us. We disclose all of the categories of personal information noted above with service providers that process personal information on our behalf (e.g., data storage providers, email services, Internet service providers, and research firms), business partners (e.g., event coordinators, professional advisors and consultants), government and law enforcement entities, advertising and marketing companies, and our affiliates.

We will keep your personal information for as long as we have a relationship with you. Once our relationship with you has come to an end, we will retain your personal information for a period of time that enables us to:

- Maintain business records for analysis and/or audit purposes.
- Comply with record retention requirements under the law or other relevant legal or regulatory requirements.
- Defend or bring any existing or potential legal claims.
- Deal with any complaints regarding the services.
- Preserve historical records of transactions and property.

We will delete your personal information when it is no longer required for these purposes.

We also disclose certain personal information in exchange for services, insights, or other valuable consideration. Such disclosures may be considered “sales” even if no money is exchanged. And we disclose certain personal information for purposes of targeting advertising on unaffiliated or distinctly branded websites or applications. Such disclosures are considered a “share” under California law. We may share or sell the following categories of information to the third parties listed below:

Categories of personal information disclosed in exchange for valuable consideration or for advertising	Categories of third parties to whom this information is or was disclosed in the past 12 months
---	---

Identifiers

Digital advertising and analytics companies, marketing partners, social media platforms, auction partners and event co-hosts.

Internet activity

Digital advertising and analytics companies, social media platforms, and marketing partners.

Transactions	Digital advertising and analytics companies, auction partners and event co-hosts, and marketing partners.
Payment information	N/A
Demographics	Digital advertising and analytics companies, marketing partners, social media platforms, auction partners and event co-hosts.
Location information	Digital advertising and analytics companies, auction partners and event co-hosts.
Professional and employment information	Marketing partners, auction partners, and event co-hosts.
Video and audio information	Auction partners and event co-hosts.
Inferences	Digital advertising and analytics companies, marketing partners, social media platforms, auction partners and event co-hosts.

Residents of California and Virginia have the following rights:

- **Right to know.** You may request that we provide you with information about the categories of your personal information that we collect, the specific pieces of personal information that we hold about you, the categories of sources from which we collected the information, our reasons for collecting and sharing the information, and the types of third parties with which we share the information.
- **Right to deletion.** You may ask us to delete your personal information, subject to certain exceptions.

- **Right to opt out of sales or the processing of information for targeted advertising.** You have the right to opt out of certain disclosures of your personal information for valuable consideration and to opt out of the processing of personal information for targeted advertising. You can exercise this right through letting us know by email: info@sybilart.com
- **Right to opt out of profiling.** You may have the right to opt out of profiling that supports decisions that have legal or similarly significant effects. We do not engage in such profiling
- **Right to be free from discrimination.** You have the right to not be discriminated against for exercising any of the above-listed rights. We may, however, provide a different level of service or charge a different rate reasonably relating to the value of your personal information.
- **Right to appeal.** You may have the right to appeal a decision we make regarding your rights request.

If you would like to exercise any of the above rights, please submit your request at info@sybilart.com.

Please note that we may request specific information from you in order to verify your identity, and there may be circumstances where we will not be able to honour your request. For example, if you request deletion, we may need to retain certain personal information to comply with our legal obligations or other permitted purposes. We will only use personal information provided in a verifiable consumer request to verify your identity or authority to make the request. If you are submitting a request through an authorized agent, the authorized agent must provide us with your signed written permission stating that the agent is authorized to make the request on your behalf. We may also request that any authorized agents verify their identity and may reach out to you directly to confirm that you have provided the agent with your permission to submit the request on your behalf.

ADDITIONAL INFORMATION FOR EEA, UK, AND SWITZERLAND CUSTOMERS & VISITORS TO SYBIL ART BUSINESS MANAGEMENT & CONSULTING - PLATFORMSITES AND APPS

Who is responsible for your data?

If you transact in an auction or private sale in a Sybil Art Business Management & Consulting – PLATFORM office in the EEA, UK, or Switzerland, then the Sybil Art Business Management & Consulting – PLATFORM entity running the auction or sale will be the data controller for that data. The name and contact details for this entity will be set out in your consignment agreement, private sale agreement, invoice, or Conditions of Business for the auction or sale.

If you visit Sothebys.com, Sybil Art Business Management & Consulting – PLATFORM Metaverse or use the Sybil Art Business Management & Consulting – PLATFORM Ltd. app, then the data controller will be Sybil Art Management & Consulting - PLATFORM, Antwerp, Belgium in the EU. This Policy contains our contact details.

What is the legal basis on which Sybil Art Business Management & Consulting – PLATFORM relies to process your data?

On some occasions, Sybil Art Business Management & Consulting – PLATFORM processes your data with your consent (e.g., when you agree that we may place cookies, or if you ask Sybil Art Business Management & Consulting – PLATFORM to send you information about upcoming events).

On other occasions, Sybil Art Business Management & Consulting – PLATFORM processes your data when we need to do this to fulfil a contract with you (e.g., for billing purposes) or where we are required to do this by law (e.g., where we have to fulfil anti-money laundering requirements). If it is mandatory for you to provide data for these purposes, we will make this clear at the time and will also explain what will happen if you do not provide the data (e.g., that we will not be able to process a bid at auction).

Sybil Art Business Management & Consulting – PLATFORM also processes your data when it is our legitimate interests to do this and when these interests are not overridden by your data protection rights. For example, Sybil Art Business Management & Consulting – PLATFORM has a legitimate interest in ensuring the security and integrity of our auctions, in learning about the interests and preferences of our current and prospective clients, in developing new business opportunities, in maintaining accurate business and provenance records, and in ensuring that our websites and apps operate effectively. When we process personal information to meet our legitimate interests, we put in place robust safeguards to ensure that your privacy is protected and to ensure that our legitimate interests are not overridden by your interests or fundamental rights and freedoms.

Data transfers

Sybil Art Business Management & Consulting – PLATFORM may transfer personal information to countries outside the EEA, Switzerland and the UK, including to countries which have different data protection standards to those which apply in the EEA, Switzerland and the UK. Sybil Art Business Management & Consulting – PLATFORM has put in place European Commission approved standard contractual clauses to protect this data. For more information on the appropriate safeguards in place, please contact us at the details above.

Automatic Decision-Making

The way we analyse personal information for advertising and marketing purposes and for client development, risk assessment, or fraud prevention may involve profiling, which means that we may process your personal information using software that is able to evaluate your personal aspects and predict risks or outcomes. For example, we may use the information we collect (e.g., bidding and purchase information, browsing history, and consignment history) to infer your interests. And we may use those inferences to support automated decisions about the content, recommendations, and offers we present to you on our digital

properties. We may use automated tools to flag for further review suspicious activities associated with our services (e.g., multiple logins from different locations within a short period of time or activities associated with suspicious IP addresses). These automated activities will not, in themselves, have legal or similar effects for you.

Your rights

You may ask Sybil Art Business Management & Consulting – PLATFORM for a copy of your personal information, to correct it, erase it, restrict our use of it, or to transfer it to other organizations at your request subject to local law. You also have rights to object to some processing and, where we have asked for your consent to process your data, to withdraw this consent. In particular, you have rights to object to direct marketing at any time.

Where we process your data because we have a legitimate interest in doing so (as explained above), you also have a right to object to this. These rights may be limited in some situations – for example, where we can demonstrate that we have a legal requirement to process your data.

If you would like to discuss or exercise such rights, please contact us at the details below. We encourage you to contact us to update or correct your information if it changes or if the personal information, we hold about you is inaccurate. We will contact you if we need additional information from you in order to honour your requests.

We hope that we can satisfy queries you may have about the way we process your data. We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. However, if you have unresolved concerns and believe that we have not been able to assist with your complaint or concern, you also have the right to complain to data protection authorities.

For questions about this Privacy Policy please email us at info@sybilart.com or contact:

Sybil Art Management & Consulting - PLATFORM
Lange Koepoortstraat 64.

2000 Antwerp

Belgium

ADDITIONAL INFORMATION FOR CHINA CUSTOMERS

There may be some circumstances where we will seek further consents from you. For example, if we change the purposes or legal basis for processing your personal information, how we process your personal information, recipients of your personal information, the types of personal information we process or when we process sensitive personal information. Please indicate your consent when prompted. Please note that if you do not provide your consent, we may not be able to provide some or all of our services to you.

In circumstances where your personal information is shared between and used by members of the Sybil Art Business Management & Consulting – PLATFORM which are based outside China, each such member will process your personal information in accordance with the Privacy Policy. You may contact them by using the contact details mentioned in “How to Contact Us”. Where we ask for your separate consent for certain sharing and transfers, please indicate your consent when prompted. Please note that if you do not provide your consent, we may not be able to provide some or all of our services to you.

If you reside in mainland China or consign or transact there or use our Chinese apps or website your personal information may also be held on our servers in mainland China. Your account will be serviced by our international and Chinese based client teams.

Your Rights

You may ask Sybil Art Business Management & Consulting – PLATFORM for a copy of your personal information, to correct it, erase it, restrict our use of it, or to transfer it to other organizations at your request, subject to local law. You

also have rights to object to some processing and, where we have asked for your consent to process your data, to withdraw this consent. In particular, you have rights to object to direct marketing at any time. Please note that if you withdraw your consent to processing your information, we may not be able to provide some or all of our services to you. We will advise you if a service is no longer available to you. You may also not be able to use all of the functionality that is available on our digital properties, websites or apps.

If you would like to discuss or exercise such rights, please contact us at info@sybilart.com . We encourage you to contact us to update or correct your information if it changes or if the personal information we information, you is inaccurate. We will contact you if we need additional information from you in order to honour your requests.

To exercise your rights in respect of your personal information, please contact us through the details set out in the “How to Contact Us” section above.

CHANGES TO THIS POLICY

You may request a copy of this Policy from us using the contact details set out above. We may modify or update this Policy from time to time. If we change this Policy, we will notify you of the changes by updating this Policy on our website. Where changes to this Policy notice will have a fundamental impact on the nature of the processing or otherwise have a substantial impact on you, we will give you sufficient advance notice so that you have the opportunity to exercise your rights.

Purposes of data processing:

- 1. On the legal basis of contract fulfilment or contract preparation:**

- Purchase, sale and public auctions of movable goods from various departments
- Exercise of the arms trade
- Estimation of works of art and other movable goods of various categories
- Catalogue production and dispatch (auction catalogues)
- Auction promotion (analogue as well as online and digital)
- Auction processing (current auctions and online auctions)
- Buyer invoicing
- Auction-related logistics
- Customer service (customer consulting)
- Operation of customer loyalty programs and the website www.sybilart.com
- Customer satisfaction and loyalty development through the organisation of charity auctions, sweepstakes, events and customer surveys
- Provision of communication channels as a service for registered users (SybilArt)
- Auction controlling

2. On the legal basis of the fulfilment of a legal obligation to which we are subject

- Measures to prevent money laundering and terrorist financing
- Duties of care according to the Cultural Property Return Act
- Austrian Commercial Code
- Tax code

3. On the legal basis of our (predominant) legitimate interests

- Recovery and winning of new customers
- Direct marketing activities
- Prevention and investigation of criminal offences
- Provision of IT security and IT operations

4. Legal basis for data processing

- Contract fulfilment and implementation of pre-contractual measures
- Direct marketing activities

5. Description of our (predominant) legitimate interests for direct marketing purposes:

We also process personal customer data (but not those of children or special categories of personal data within the meaning of GDPR [“sensitive data”]) in order to use them as information sources regarding our services and for direct advertising for (further) services.

We process personal data relating to persons with whom we have had personal contact (e.g. at auctions, events, trade fairs, invitations, etc. ...) through exchanging business cards, for the purpose of establishing contact, for the establishment of a contact database and for customer acquisition. Data derived from business cards may be supplemented with data from public sources (e.g. company register, company website).

We have a legitimate interest in the processing of personal data for the purpose of direct marketing (recital 47, last sentence of the GDPR). The customer data that we have at our disposal from existing contractual relationships and for which the storage period is still valid will be processed. This does not extend the storage period. The primary goal of data processing is customer acquisition with the aim of re-establishing a (pre-)contractual relationship and securing customer loyalty. In doing so, we rely on the freedom of employment protected by conventional and constitutional law and freedom of communication) and on the following rights:

- for the transmission of postal information and advertising including the dispatch of catalogues and any press release;
- to make intelligence-related and advertising calls following consent;
- for the transmission of electronic mail (e-mail and auction newsletters) following consent;
- for the transmission of electronic mail (e-mail and auction newsletters) pursuant to “Existing Customer Information”.

6. Opposition to processing for the purposes of direct marketing

You may object to the use of your personal data for direct marketing purposes at any time and without stating reasons. The objection means that we will no longer process your personal data for these purposes in the future.

7. Description of our (predominant) legitimate interests for purposes of data processing within the Group:

We are part of a group of companies. In order to fulfil our extensive obligations, we also make use of the services of affiliated companies. We have a predominant legitimate interest in this.

8. Evaluation of personal aspects of the client (“profiling”)

“Scoring”:

For the purpose of optimal customer care, we store customer activities (e.g. submissions, complaints, etc.) so that we can take relevant and targeted measures to improve customer satisfaction and loyalty and customise our service.

“Profiling”:

For the purpose of optimal customer service and customer information, we store the areas of interest (categories) selected by you in Sybilart.com as well as the objects to be observed selected by you. We use these rated interests to automatically notify you by e-mail.

9. Opposition to profiling

You may object to the use of your personal data for profiling purposes at any time and without stating reasons or deactivate the relevant areas of interest in Sybilart.com. The objection or deactivation in Sybilart.com means that we will no longer process your personal data for profiling purposes in the future.

10. Obligation to provide personal data

You must provide us with your personal data in order to enable us to fulfil the contract in accordance with our General Terms and Conditions and in compliance with the statutory provisions mentioned.

11. Automated decision making

You are not subject to any automated decision that has any legal effect on you.

12. Categories of external economic service providers to whom we may transfer your personal data if required

- Tax Consultant / Auditor
- Lawyers
- Contracted service providers:
 - Logistics partner
 - NL dispatch service provider
 - Software service provider
 - Agencies
 - Print shops

13. Storage period

We will delete your personal data as soon as it is no longer required for the above-mentioned purposes. Personal data may be retained for the period during which claims may be asserted against our company (statutory limitation period of thirty years), as well as for contractual documentation and proof of ownership.

In addition, we store your personal data insofar as we are legally obliged to do so. Corresponding duties of proof and storage result, among other things, from the duties of care under the Cultural Property Return Act, which also provide for a storage duty of 30 years in order to make the cultural property and its contributor identifiable, including the purchase and sales prices, the Commercial Code, the Tax Code and the provisions of commercial law to prevent money laundering and terrorist financing. The storage periods are at least five and seven years respectively.

14. Your rights with respect to us:

14/1 Basis: Content

14/2 Right to revoke consent under data protection law:

As a person affected by the processing of personal data, you have the right to revoke your consent to the processing of your personal data at any time. The revocation of consent does not affect the lawfulness of the processing carried out on the basis of consent up to the revocation.

14/3 Right to information:

You have the right to request information from us as to whether your personal data is being processed, provided that the provision of this information would not endanger business or commercial interests of the responsible person or third party.

Your right of access includes the following information:

- processing purposes,
- the categories of personal data processed by us,
- the recipients or categories of recipients to whom personal data have been or will be disclosed,
- if possible, the planned duration for which your personal data will be stored or, if this is not possible, the criteria for determining this duration,
- the existence of your right to correction or deletion of the personal data concerning you or to restriction of processing by us as the responsible party or your right to object to this processing,
- the existence of a right of appeal to the Austrian Data Protection Authority as supervisory authority.

14/4 Right to rectification of data

You have the right to demand the immediate correction of your incorrect personal data or its completion.

14/5 Right to data deletion

You have the right to demand that your personal data be deleted immediately if the reasons stated in Art. 17 para. 1 GDPR are fulfilled.

14/6 Right to limit data processing

You have the right to demand that the processing of your personal data be restricted if the reasons stated in Art. 18 para. 1 GDPR are fulfilled.

14/7 Right to data transferability

You have the right to receive the personal data that you have provided to us in a structured, common and machine-readable format, provided that the legal requirements are met.

14/8 Right of opposition

You have the right to object at any time to the processing of your personal data for the purpose of direct marketing.

14/9 Right of appeal

You have the right to lodge a complaint with the supervisory authority if you are of the opinion that the processing of your personal data violates the GDPR or the DSG.

14/20 Supervisory authority

Belgian Data Protection Authority

15. Newsletter

The dispatch of our newsletter takes place on the basis of consent given by you. You can unsubscribe from the auction newsletter by clicking the unsubscribe link at the end of each auction newsletter.

For the dispatch of our auction newsletter, we commission an external service provider. The latter has undertaken to comply with the applicable data protection provisions vis-à-vis us.

16. SybilArt Registration

Registration for SybilArt takes place using the double opt-in procedure. After registration you will receive an e-mail asking you to confirm your registration. This confirmation e-mail is used to check whether the owner of the e-mail address

as the person concerned has authorised the receipt of automated notifications. The personal data transferred to us when you register for SybilArt is determined by the input mask used for this purpose.

17. Contact via our website

Due to legal requirements, our website contains information that enables us to be contacted electronically quickly and enables you to communicate directly - including by electronic means - with our company. If you contact us by e-mail or via a contact form, the personal data you provide will be stored automatically. Such personal data transmitted to us by you on a voluntary basis will be stored by us for the purpose of processing or contacting you. This personal data will not be passed on to third parties.

18. Privacy policy regarding the use of Google Analytics on www.sybilart.com

This website uses Google Analytics, a web analysis service provided by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA (“Google”).

Google Analytics uses so-called “cookies”, that is, text files that are stored on your computer for the purpose of enabling an analysis of how users navigate the website. The information generated by the cookie about your use of this website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will comply with the privacy provisions of the US Safe Harbor Agreement.

During your visit to our website the following data will be recorded:

- Pages viewed
- Your behaviour on the pages (e.g. clicks, scrolling behaviour and length of stay)
- Your approximate location (country and city)
- Your IP address (in abbreviated form, so that no clear identification is possible)
- Technical information such as browser, Internet provider, terminal device and screen resolution
- Source of your visit (i.e. via which website or advertising medium you came to us)

Google will use this information for the purpose of evaluating how you use the website, drafting reports on website activity for website operators and providing further services related to website activity and Internet usage.

However, if IP anonymisation is activated on this website, your IP address will be first shortened within Member States of the European Union or in other states that are signatories of the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and shortened there. IP anonymisation has been activated on this webpage.

Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google.

You can prevent the installation of cookies by selecting the appropriate setting of your browser software. However, it must be emphasised that in this case you may not be able to use the full functionality of this website.

You can also prevent Google from collecting and processing the data generated by the cookie concerning your use of the website (including your IP address) by downloading and installing the browser plug-in available at the following link: tools.google.com/dlpage/gaoptout

For more information about Google's terms of use and privacy policy, please visit www.google.com/intl/de/policies/ bzw. unter www.google.com/intl/de/policies/privacy/.

Please note that on this website Google Analytics has been expanded with the code "gat.anonymizeIp();" in order to ensure an anonymised collection of IP addresses (so-called IP masking).

Sybil Art uses Google Analytics to analyse website use, e.g. in the form of anonymous evaluations and graphics on page views and visits, as well as for remarketing, reports on impressions in the Google Display Network, integration of DoubleClick Campaign Manager and Google Analytics reports on performance according to demographic characteristics and interests.

Google Analytics stores cookies in your web browser for a period of two years from the point of your last visit. These cookies contain a randomly generated user ID that can be used to recognise you on future website visits.

The recorded data is stored together with the randomly generated user ID, which enables the evaluation of pseudonymous user profiles. This user-related data is automatically deleted after 14 months. Other data remain stored in aggregated form for an indefinite period.

19. Privacy policy regarding the use of Google Double Click and remarketing at www.sybilart.com

Our website sybilart.com uses Google Double Click, an online advertising service of Google Inc. (“Google”). Google Double Click uses so-called cookies, text files that are stored on users’ computers, enabling an analysis of their use of the website. Google Double Click also uses so-called web beacons (invisible graphics). Web beacons make it possible to evaluate specific information, such as visitor traffic to the pages of our website. The information generated by cookies and web beacons about the use of this website (including users’ IP addresses) and delivery of advertising formats is transmitted to a Google server in the United States for storage. Google may forward this information to its contractual partners. Google will not, however, combine your IP address with any other data you have stored.

Furthermore, our website uses remarketing with Google Analytics for online advertising. This allows us to offer you personalised ads based on the interests you have shown on our website in appropriate advertising spaces on other websites. This includes the use of cookies by third parties, including Google. The combined use of first-party cookies (such as Google Analytics cookies) and third-party cookies (such as DoubleClick cookies) allows us to serve you ads based on your previous visits to this site and to optimise and evaluate your experience. With the help of remarketing, information about your surfing behaviour is collected and stored for marketing purposes in anonymous form (targeting/retargeting). This data is stored on your computer using cookies. Using an algorithm, targeted product recommendations can then be displayed as personalised advertising banners on other websites (so-called publishers). Under no circumstances can this data be used to identify you personally as a visitor to this website. The collected data will only be used to improve the advertising offer.

Users can prevent the installation of cookies and Google Double Click in various ways:

- a) by changing the settings on their browser software accordingly;
- b) by opting out of interest-based ads from Google;
- c) by opting out of interest-related ads from the advertisers that are part of the self-regulating campaign “About Ads”;
- d) by permanently opting out with a browser plug-in.

Deleting cookies in your browser settings will also delete the settings named under b) and c).

You can find more information about data protection and cookies with regard to advertisements through Google Double Click in Google's privacy statement, especially under the following links:

www.google.de/policies/privacy/partners/
www.google.de/intl/de/policies/technologies/ads
support.google.com/adsense/answer/2839090

20. Privacy policy regarding the use of Google Adwords

Our website sybilart.com uses the web analysis service Google Adwords of Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google"). Google Adwords uses cookies for the purpose of targeting visitors via remarketing campaigns with online advertising at a later point in time in the Google advertising network. To serve remarketing ads, third parties such as Google use cookies based on a visit to this website. As a user, you have the option of deactivating the use of cookies by Google by accessing the page for deactivating Google at www.google.com/ads/preferences.

21. Privacy policy regarding the use of Facebook Custom Audiences at www.sybilart.com

This website uses Custom Audiences, a web analysis service of Facebook Ireland Limited ("Facebook"). Facebook Custom Audiences uses so-called tracking tools (such as Pixel, SDKs and APIs), which are implemented on the website sybilart.com and the Sybil Art mobile app. Data concerning actions taken by users on the website sybilart.com or the mobile Sybil Art app ("Event Data") is transferred to a server of Facebook Inc. in the USA and saved there, in order to create custom audiences of people who have visited our website sybilart.com ("custom audiences of sybilart.com") or to create custom audiences of people who have used our Sybil Art mobile app ("custom audiences of the Sybil Art mobile app").

In connection with such audience targeting and optimisation, Facebook will: Use Event Data collected from our website sybilart.com or mobile app for ads optimisation only after such Event Data has been aggregated with other data collected from other advertisers or otherwise collected on Facebook. Not allow other advertisers or third parties to target advertising solely on the basis of Event Data collected from our website sybilart.com or mobile apps.

By clicking the button to “accept” the cookie banners and by visiting our website sybilart.com, the user accepts the following conditions:

(a) third parties, including Facebook, may use cookies, web beacons, and similar technologies to collect or receive information from sybilart.com and elsewhere on the internet and use that information to provide measurement services and target ads,

(b) users of our website sybilart.com can opt-out of the collection and use of information for ad targeting, and

(c) users can access a mechanism for exercising such choice (e.g. www.aboutads.info/choices oder www.youronlinechoices.eu/).

22. Privacy policy regarding the use of sharing at www.sybilart.com

Our website hosts share buttons for the social networks Twitter Inc., 795 Folsom St., Suite 600, San Francisco, CA 94107, USA, Facebook, 1601 South California Avenue, Palo Alto, CA 94304, USA, YouTube, YouTube, LLC, 901 Cherry Ave, San Bruno, CA 94066, USA, Instagram from Instagram Inc., 1601 Willow Road, Menlo Park, CA, 94025, USA. The share buttons can be recognized by their respective logos.

All share buttons are set up to comply with data protection regulations. Only when you click on the respective “Share Button” on our website (and only then) will a direct connection be established between your browser and the server of the operator of the respective social network. According to the operators of the aforementioned social networks, no personal and company-related data is collected from the social networks without a click on the respective share button. Such data, including the IP address, is only collected and processed for logged-in members. If you do not wish your visit to our website to be linked to your social network user account, please log out of that social network user account.

Within this context, we would like to point out that as the provider of the website we are not aware of the content of transmitted data or its use by social networks. You can find more information about the use of data by social networks in the privacy statements of the aforementioned social networks.