

PRIVACY POLICY

1. APPLICABILITY OF OUR PRIVACY POLICY

Hotlotz understands the importance of information about you and your privacy. We conduct our business in compliance with applicable law and have implemented measures to protect your personal information.

This is the Privacy Policy of Hotlotz Pte Ltd (Company Number 201524698M) and Hotlotz Marketplace Pte Ltd (Company Number 202531742M), with their office addresses at 28 Jalan Kilang Barat, Singapore 159362 ("**us**", "**we**" or "**our**").

Our Privacy Policy helps you to understand how we collect, use, share and protect information about you. Respecting and protecting your privacy and your personal data is very important to us.

Your personal data will be held by us in accordance with the Personal Data Protection Act 2012 ("**Singapore PDPA**") and the General Data Protection Regulation ("**GDPR**"), being the data protection laws of Singapore and the European Economic Area ("**EEA**") respectively. GDPR applies in the United Kingdom, tailored by the Data Protection Act 2018.

For the purposes of Singapore PDPA/ GDPR, the organisation/ data controller is Hotlotz Pte Ltd or Hotlotz Marketplace Pte Ltd (as applicable).

If you have any questions in relation to this Privacy Policy, please contact us at:

- Address: Attn: Our Data Protection Officer, Hotlotz Pte Ltd, 28 Jalan Kilang Barat, Singapore 159362
- Email: hello@hotlotz.com

For purposes of GDPR, the name of our representative in the United Kingdom is Ruby Khan with office address c/o DWF, 20 Fenchurch Street, London, EC3M 3AG.

Please read this Privacy Policy to ensure you understand how we will collect and use your personal data and the rights you have in relation to your personal data. This Privacy Policy was last updated on the date above and may vary from time to time so please check it regularly.

2. HOW WE COLLECT YOUR PERSONAL DATA

This Privacy Policy applies to our processing of personal data in relation to the provision of any of our services. We may collect information about you:

- when you visit any of our websites or website pages (including traffic data, web logs or other communications data and the resources you access), whether via a re-direction from a third party website (e.g. <https://www.the-saleroom.com/en-gb>) or otherwise
- when you use any of our mobile responsive websites or applications
- if you use our Wi-Fi
- if you use any social network/media or other platforms or providers to access or use any of our websites, webpages, applications, products, services, information, content or features
- when you visit our saleroom or other viewing locations
- when you become a member or set up an account, register or sign up with us, fill in any form or subscribe to any of our products, services, information, content or features (including alerts and newsletters)
- when you sell, buy, access or use any of our products, services, information, content or features or you transact with or through us (including payment processing and information from third parties)

- when you request or provide information or feedback, correspond or communicate with us or contact us with a question or for assistance (including monitoring or recording of certain telephone conversations)
- when you otherwise provide us with information about you (including participating in any survey, competition or the like)
- from public sources of information
- from our third party business partners (e.g. <https://www.the-saleroom.com/en-gb>) in relation to any transactions directed to our websites or website pages from such third parties

Information about you may include information you provide about any other person in which case you agree that you have already given written notice to that person of the intention to use the information for the purposes and in the manner set out in this Privacy Policy, that you have obtained the written consent of that person to such use or provision of their information and that the intended use of such information in accordance with the Privacy Policy is consistent with and covered by the consent of that person.

3. TYPES OF PERSONAL DATA COLLECTED BY US

Information about you collected by us may include:

- your first and last name, address, telephone number, e-mail address, date of birth, gender, NRIC, FIN or passport number (or other government identifiers), financial information such as bank and credit card details, device ID and IP address
- a copy or image of your government identity document (including your NRIC, FIN or passport), a photograph or face "selfie", and biometric facial data and liveness-detection results generated from them, to identify you or comply with applicable law including relating to the sale of precious stones and metals
- information about your interactions with us, including monitoring, noting or recording a call, email or letter or other records of any contact between you and us

- your membership, account or subscription information or details including passwords or challenge questions and answers
- information on your access or use of our products, services, information, content, features or premises
- location information of your mobile device (if enabled)
- for website, webpage, application or Wi-Fi access and use, your phone and computer type and operating system, IP address, device ID, browser type and language, geographic location, access times and usage information
- information associated with managing requests, queries and complaints
- marketing and other preferences, likes or interests based on what you specify to us including contact method and preferred products, services, information, content or features
- information from other organisations including identity verification, know your customer, fraud-prevention agencies, business directories, credit reference agencies, our aggregation platform partners or individuals we believe you have authorised to provide your personal details on your behalf
- some information about your physical or mental health or condition, religious or similar beliefs, or commission or allegations of an offence (for example if you attend any of our salerooms)
- information from social network/media or other platforms or providers to access or use any of our websites, webpages, applications, products, services, information, content or features

4. WHY WE COLLECT YOUR PERSONAL INFORMATION

Information about you may be collected, used, shared or otherwise processed for the following purposes:

Purpose	Legal basis for processing personal data under GDPR (Please refer to section 5 below)	Legal basis for processing personal data under Singapore PDPA
your access or use of, or to otherwise provide or administer, our products, services, information, content, features, premises or other business activities (including verifying your identity, know your customer, eligibility, membership or subscription, accepting, rejecting or blocking you if needed, and selling or purchasing property or services)	Legitimate interests Performance of a contract (for membership or subscription and selling or purchasing property or services)	Consent Legitimate interests Contractual necessity
to enter into or perform any contract with you, including processing of any payments, refunds, deliveries and logistics	Performance of a contract	Consent Contractual necessity
notifying you about changes to our products, services, information, content, features, premises or other business activities	Legitimate interests (if you have previously requested or received services) Consent (if you have not requested or received services but have signed up to receive Hotlotz' marketing materials)	Legitimate interests (if you have previously requested or received services) Consent

responding to enquiries and requests from you or people you have authorised	Performance of a contract	Contractual necessity
forecasting, planning, record keeping, management and administration	Legitimate interests	Legitimate interests Compliance with a legal obligation
contact relationship management, managing your membership or account and providing you with customer support	Legitimate interests	Consent Legitimate interests
benefit, loyalty, promotional and reward programs	Legitimate interests	Consent Legitimate interests
market research, business and sales analysis or analytics, feedback and satisfaction surveys to improve our products, services, information, content, features or premises	Legitimate interests	Consent Legitimate interests
ensuring that our websites, webpages or applications are presented in the most effective manner for you and your devices	Legitimate interests	Consent Legitimate interests
product and service improvement, enhancement, personalisation, design or development	Legitimate interests	Consent Legitimate interests

training, learning and development	Legitimate interests	Consent Legitimate interests
advising you of forthcoming sales, events, products and services	Legitimate interests (if you have previously requested or received services) Consent (if you have not requested or received services but have signed up to receive Hotlotz' marketing materials)	Legitimate interests Consent
providing updates, offers, promotions, invitations to events and relevant advertising and informing you about products and services	Legitimate interests (if you have previously requested or received services) Consent (if you have not requested or received services but have signed up to receive Hotlotz' marketing materials)	Legitimate interests Consent
ensure the safety and security of our properties and systems and other security and risk management or information	Legitimate interests	Consent Legitimate interests
conducting checks against money laundering, terrorism/proliferation financing and related risks	Compliance with a legal obligation Legitimate interests	Consent

		Compliance with a legal obligation Legitimate interests
preventing and detecting fraud or other crimes or other wrongdoing or recovering debts	Compliance with a legal obligation Legitimate interests	Consent Compliance with a legal obligation Legitimate interests
conducting internal audits or investigations	Legitimate interests	Consent Legitimate interests
resolving any disputes or in relation to any transaction, demand, order, request, right, enforcement, property or safety issue, claim, proceeding, insurance or other law, regulation or requirements	Compliance with a legal obligation Legitimate interests	Consent Compliance with a legal obligation Legitimate interests
in connection with any corporate transaction, such as the sale of our business, a divestiture, merger, consolidation, or asset sale, or in the event of insolvency or the like	Legitimate interests	Consent Legitimate interests
complying with other laws, regulations or requirements, including providing assistance to law enforcement, judicial and other government agencies	Compliance with a legal obligation	Consent Compliance with a legal obligation

working with any third party including our service providers (including the ATG group and thesaleroom.com, our whitelabel online auction platform provider, Stripe, our payment processing, Persona, our know your customer and identity verification provider, and delivery and shipping providers)	Legitimate interests	Consent Legitimate interests
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We may contact you for the above purposes by telephone call, email, text or SMS messaging, post and other means.

We will not use your personal data for purposes other than those for which we have informed you, or which are permitted under applicable laws and regulations.

5. LEGAL BASIS FOR USING YOUR PERSONAL DATA

Below is a further explanation of each legal basis for processing your personal data as outlined in the table in section 4 above.

5.1 Where using your data is in our legitimate interests (“Legitimate interest”)

We are allowed to use your personal data where it is in our interests to do so, and those interests are not outweighed by any potential prejudice or risk to you.

We believe that our use of your personal data is within a number of our legitimate interests, including:

- To enable us to provide our services to our customers;
- To help us satisfy our legal obligations (for example, in relation to prevention of money laundering and counter terrorism/proliferation);
- To help us understand our customers better and provide better, more relevant services to them;

- To enable us to recruit and retain appropriate personnel; and
- To help us keep our systems and physical premises secure and prevent unauthorized access or cyber attacks.

We do not think that any of the activities set out in this Privacy Policy will prejudice or adversely impact you in any way. However, you do have the right to object to us processing your personal data on this basis. We have set out details regarding how you can go about doing this in section 7 below.

5.2 Where using your personal data is necessary for us to carry out our obligations under our contract with you ("Performance of a contract" or "Contractual necessity")

We are allowed to use your personal data when it is reasonably necessary to do so for the performance of our contract with you, i.e. where processing is reasonably necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract.

For example, we need to collect your contact details in order to be able to communicate with you and provide you with some of the services you have requested.

5.3 Where you give us your consent to use your personal data ("Consent")

We are allowed to use your data where you have specifically consented. In order for your consent to be valid:

- It has to be given freely, without us putting you under any type of pressure;
- You have to know what you are consenting to – so we will make sure we give you enough information;
- You should only be asked to consent to one thing at a time – we therefore avoid "bundling" consents together so that you don't know exactly what you are agreeing to; and

- You need to take positive and affirmative action in giving us your consent – we are likely to provide a tick box for you to check so that this requirement is met in a clear and unambiguous fashion.

As part of our relationship with you, we may ask you for specific consents to allow us to use your data in certain ways. If we require your consent, we will provide you with sufficient information so that you can decide whether or not you wish to consent.

You have the right to withdraw your consent at any time. We have set out details regarding how you can go about this in section 7 below.

5.4 Where processing is necessary for us to carry out our legal obligations (“Compliance with a legal obligation”)

As well as our obligations to you under any contract, we also have other legal obligations that we need to comply with and we are allowed to use your personal data when we need to in order to comply with those other legal obligations.

For example, we are required to carry out identity verification, know your customer and anti-money laundering and counter terrorism/proliferation financing checks about our customers and we need to collect and use certain information about them in order to do so. We also need to make payment of taxation and customs duties and cooperate with regulators, enforcement authorities and the courts.

6. WHO DO WE SHARE YOUR DATA WITH

We may share information about you with:

- if you are a buyer, to the seller of an item you buy where we are entitled to refer any issues to you both to deal with directly, where the seller wishes to carry out any checks regarding your identity or other legal, regulatory or reputational aspects prior

to confirming a sale to you, or where otherwise permitted under our Terms & Conditions;

- if you are a seller, to the buyer of an item you buy where we are entitled to refer any issues to you both to deal with directly or where otherwise permitted under our Terms & Conditions;
- business partners and vendors we work with to deliver products and services to you (including payment processing, credit agencies, third party online auction service provider partners, identity verification partners and delivery and logistics providers)
- other providers of legal, accounting, financial services, business consulting or insurance services to us
- financial institutions for purposes such as facilitating payments
- governmental organisations, such as customs/excise agencies or as required by local laws and regulations
- research organisations for market research, business and sales analysis or analytics purposes

Your information is disclosed to the above only for relevant purposes mentioned in this Privacy Policy or to protect the interests of our customers.

In some cases, we encrypt, anonymise and aggregate the information before sharing it (removing personally identifiable features or presenting the information in groups or segments).

7. WHAT ARE MY RIGHTS?

You have various rights in relation to the data which we hold about you. We have described these below.

To get in touch with us about any of these rights, please contact us at:

- Address: Attn: Our Data Protection Officer, Hotlotz Pte Ltd, 28 Jalan Kilang Barat, Singapore 159362

- Email: hello@hotlotz.com

We will seek to deal with your request without undue delay, and in any event within thirty days (subject to any extensions to which we are lawfully entitled). Please note that we may keep a record of your communications to help us resolve any issues which you raise.

7.1 Your rights under Singapore PDPA

7.1.1 Right to access and correct your data

You have the right to a copy of the information which we hold about you, including information on how this will be used and to ensure this information is accurate. Please refer to the “Contact Us” section below to communicate your data access or data correction request to us.

7.1.2 Right to withdraw your consent for us to use your personal data

You also have the right to ask us not to process your personal data for marketing purposes – you can exercise this right by logging into your account and editing your communication preferences in the ‘Sign In’ / ‘My Account’ section of hotlotz.com.

Please note that if you withdraw your consent for us to use and process your personal data in accordance with Singapore PDPA, we may not be able to continue providing our service to you. We may need to retain certain of your data or the other purposes referred to in the table in section 4 above.

7.1.3 Right to complain

For information about data protection generally, or if your concerns are not resolved to your satisfaction, you may contact the Personal Data Protection Commission of Singapore at www.pdpc.gov.sg.

7.2 *Your rights under GDPR*

The GDPR gives you the following rights in relation to your personal data:

7.2.1 *Right to object*

This right enables you to object to us processing your personal data where we do so for one of the following reasons:

- because it is in our legitimate interests to do so (for further information please see section 5 above);
- to enable us to perform a task in the public interest or exercise official authority;
- to send you direct marketing materials; or
- for scientific, historical, research, or statistical purposes.

7.2.2 *Right to withdraw consent*

Where we have obtained your consent to process your personal data for certain activities (for example, for marketing), you may withdraw this consent at any time and we will cease to use your data for that purpose unless we consider that there is an alternative legal basis to justify our continued processing of your data for this purpose, in which case we will inform you of this condition (unless already set out in the table in section 4 above).

7.2.3 *Data subject access requests*

You may ask us for a copy of the information we hold about you at any time, and request us to modify, update or delete such information. If we provide you with access to the information we hold about you, we will not charge you for this unless permitted by law. If you request further copies of this information from us, we may charge you a reasonable administrative cost. Where we are legally permitted to do so, we may refuse your request. If we refuse your request we will always tell you the reasons for doing so.

7.2.4 *Right to erasure*

You have the right to request that we "erase" your personal data in certain circumstances. Normally, this right exists where:

- The data are no longer necessary;
- You have withdrawn your consent to us using your data, and there is no other valid reason for us to continue;
- The data has been processed unlawfully;
- It is necessary for the data to be erased in order for us to comply with our obligations under law; or
- You object to the processing and we are unable to demonstrate overriding legitimate grounds for our continued processing.

We would only be entitled to refuse to comply with your request for erasure in limited circumstances and we will always tell you our reason for doing so.

When complying with a valid request for the erasure of data we will take all reasonably practicable steps to delete the relevant data.

7.2.5 Right to restrict processing

You have the right to request that we restrict our processing of your personal data in certain circumstances, for example if you dispute the accuracy of the personal data that we hold about you or you object to our processing of your personal data for our legitimate interests. If we have shared your personal data with third parties, we will notify them about the restricted processing unless this is impossible or involves disproportionate effort. We will, of course, notify you before lifting any restriction on processing your personal data.

7.2.6 Right to rectification

You have the right to request that we rectify any inaccurate or incomplete personal data that we hold about you. If we have shared this personal data with third parties, we will notify them about the rectification unless this is impossible or involves disproportionate effort. You may also request details of the third parties that we have disclosed the

inaccurate or incomplete personal data to. Where we think that it is reasonable for us not to comply with your request, we will explain our reasons for this decision.

7.2.7 Right of data portability

If you wish, you have the right to transfer your personal data between service providers. In effect, this means that you are able to transfer the details we hold on you to another third party. To allow you to do so, we will provide you with your data in a commonly used machine-readable format so that you can transfer the data. Alternatively, we may directly transfer the data for you.

7.2.8 Right to complain

You have the right to lodge a complaint with our regulator, who is the Information Commissioner's Office in the UK. You can contact them in the following ways:

- Phone: 0303 123 1113
- Email: casework@ico.org.uk
- Live chat
- Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

8. COOKIES

Please refer to our Cookie Policy.

Your continued use of our website is your acceptance of our continued use of cookies on our website.

9. SECURITY

We will take all reasonable precautions necessary to protect the security and integrity of all personal information provided to us, or by any other means (electronic or otherwise).

We will ensure that your personal information within Hotlotz's is suitably protected against misuse, interference and loss; and unauthorised physical or electronic access, modification or disclosure.

These measures include technology to encrypt your login, password and credit information, virus scanning, installation of security patches, backup and recovery planning, employee training, audits and other steps as well as strict verification processes and limits on access to information in our systems and the systems of our business partners and vendors.

Unfortunately, we cannot guarantee that information during transmission through the internet or any computer network is entirely safe from unauthorised intrusion, access or manipulation. There is always risk involved in sending information through any channel over the internet. You send information over the internet entirely at your own risk. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted over the internet and we do not warrant the security of any information, including personal data, which you transmit to us over the internet.

10. INTERNATIONAL TRANSFER OF DATA

Your information may be collected, used, shared or otherwise processed in or outside the country in which it was collected. Laws in other countries regarding processing of information may be less or more stringent than the laws in the country in which you were located or of collection of the information.

We will also ensure that overseas organisations we work with observe necessary confidentiality and data protection obligations.

10.1 Transfer of personal data outside Singapore

For personal data collected in Singapore, we shall ensure that either:

- we have obtained your consent for transferring your personal data outside Singapore after disclosing the country or territory to which your personal data will be transferred and giving you a reasonable summary in writing of the extent to which the personal data to be transferred to that country or territory will be protected to a standard comparable to the protection under the Singapore PDPA; or
- the transfer of your information to any recipient outside Singapore is necessary for (i) the performance of a contract between Hotlotz and you, or to do anything at your request with a view to you entering into a contract with Hotlotz; (ii) the conclusion or performance of a contract between Hotlotz and a third party which is entered into at your request; or (iii) the conclusion or performance of a contract between Hotlotz and a third party if a reasonable person would consider the contract to be in your interest; or
- such other requirements under the Singapore PDPA for the transfer of personal data outside Singapore having been observed, including the overseas recipient agreeing contractually to such requirements to protect your personal data to a standard comparable to the protection under the Singapore PDPA.

10.2 Transfer of personal data outside the EEA

For personal data collected in the EEA, the data that we collect from you may be transferred to, and stored at, destinations both within and outside the EEA. As discussed above, we may disclose your personal data to our service providers located in Singapore and elsewhere, and to employees operating in Singapore.

We want to make sure that your personal data is stored and transferred in a way which is secure. We will therefore only transfer data outside of the EEA where it is compliant with data protection legislation and the means of transfer provides adequate safeguards in relation to your data. For example, this could be:

- By way of a data transfer agreement with a third party, incorporating the current standard contractual clauses adopted by the European Commission for the transfer of personal data by controllers in the EEA to controllers and processors in jurisdictions without adequate data protection laws; or

- By transferring your data to a country where there has been a finding of adequacy by the European Commission in respect of that country's levels of data protection via its legislation; or
- Where it is necessary for the conclusion or performance of a contract between ourselves and a third party and the transfer is in your interests for the purposes of that contract (for example, if we need to transfer your data to a seller or buyer based outside the EEA); or
- Where you have explicitly consented to the data transfer.

Where we transfer your personal data outside the EEA and where the country or territory in question does not maintain adequate data protection standards, we will take all reasonable steps to ensure that your data is treated securely and in accordance with this Privacy Policy.

11. HOW LONG WILL WE KEEP YOUR PERSONAL DATA

We hold data and information electronically and in hard copy form, both at our own premises and/or in a cloud server maintained by our cloud service provider(s).

We will not keep your personal data for longer than is necessary for the purposes for which we have collected it, unless we believe that the law or other regulation requires us to keep it (for example, because of a request by a tax authority or in connection with any anticipated litigation) or if we require it to enforce our agreements.

We will hold and retain your personal data for as long as is necessary for the relevant activity, or for as long as is specified in any agreement between you and us or for as long as we provide services to you. Following that period, we will only retain your personal data for as long as is reasonably necessary in the circumstances.

When it is no longer necessary to retain your personal data, we will delete the personal data that we hold about you from our systems. While we will endeavour to permanently

erase your personal data once it reaches the end of its retention period, some of your personal data may still exist within our systems, for example if it is waiting to be overwritten. For our purposes, this data has been put beyond use, meaning that, while it still exists in the electronic ether, our employees will not have any access to it or use it again.

12. THIRD PARTY WEBSITES OR THIRD PARTY DATA PRACTICES

Our websites may contain links to other websites not operated by Hotlotz. The information you provide to us will not be transmitted to other websites, but these other websites may collect personal information about you in accordance with their own privacy notice. We cannot accept any responsibility for the privacy practices or content of those websites.

If you access any of our websites, webpages or applications from any of our third party business partners, such as the ATG Group and thesaleroom.com (<https://www.the-saleroom.com/en-gb>), or from a third party social platform, such as Facebook, we may share information with that platform to the extent permitted by your agreement with that platform and its privacy settings. We are not responsible for the practices or policies of any other person or organisation (including the ATG Group and thesaleroom.com, our whitelabel online auction platform provider) and recommend that you review their data protection or privacy policies.

13. CHANGES TO THIS POLICY

We reserve the right to amend or update this Privacy Policy and any of our privacy practices at any time. We will notify users by posting any updated policy on this page and such changes will be effective immediately and without further notice. Where appropriate, we may notify you directly of changes to this Privacy Policy either through email or a prominent notice on our website.

14. CONTACT US

If you have any questions or complaints in relation to this Privacy Policy or our data handling practices, or wish to exercise any of your rights as set out in section 7 above, please contact our Privacy Officer at:

- Email: hello@hotlotz.com
- Post: Hotlotz Pte Ltd, 28 Jalan Kilang Barat, Singapore 159362

We will provide you with reasons if we refuse any request. We may make a reasonable charge for your request in accordance with applicable laws.

15. YOUR ACKNOWLEDGEMENT AND CONSENT

By visiting our website, accessing or using any Hotlotz products, services, information, content, features or premises, you acknowledge that you have read and understood this Privacy Policy and you accept the practices and terms as set out in this Privacy Policy.

For the purpose of complying with the Singapore PDPA and the GDPR (to the extent that consent has been identified as the legal basis for processing your personal data), you also provide your consent for us to collect, use, disclose, share and otherwise process your personal data in accordance with this Privacy Policy.