

1 Introduction

SC Europe is committed to respecting your privacy and complying with applicable laws and regulations to ensure that the personal information you give us is kept appropriately secure and treated with care and integrity.

SC Europe is a company incorporated and registered in England and Wales with company number ##### (referred to in this Notice as "we, "us" and "our"). We provide support and the technology platform for online livestock auctions, and we periodically sell branded merchandise online.

Your personal information will be held and managed by **SC Europe**. By visiting and using **SC Europe's** website (the "**Site**") or for interacting with our content and/or services or by contacting our Sales, Technology and/or Customer Services Teams, you acknowledge that you have read this Privacy Notice. You must be at least 18 years' old to use the Site.

This Privacy Notice covers all personal information about you that we collect, use and otherwise process in connection with your relationship with **SC Europe** as a customer or potential customer. **SC Europe** will collect and use your personal information as described in this Privacy Notice and as permitted by applicable laws, including in circumstances where: (i) it is necessary to provide or fulfil a service requested by or for you; (ii) you have given us your consent; or (iii) it is necessary for one or more of the following legitimate interests pursued by **SC Europe**:

- To analyse, profile and monitor customer patterns and better understand the interests and preferences of our key customer audiences so we can consistently improve our products and services.
- To offer an enhanced customer experience and service, including by ensuring we personalise the Site and (if applicable) **SC Europe** updates and advertisements relating to products, services and events to make them more relevant to our customers' specific preferences.
- To ensure the proper functioning and security of our services, Site, for example by identifying and preventing fraudulent transactions.
- To ensure we continue to comply with applicable laws, for example in maintaining the accuracy of our records.

This Privacy Notice is intended for Customers of **SC Europe**.

2 Who is the controller of your personal information?

SC Europe is the controller of your personal data.

3 Your privacy Point of Contact

You can contact our Data Protection Officer (DPO) at DPO@scglobalsales.com if you have any questions about this privacy notice, need more information or would like to raise a concern.

If you want to exercise your rights please complete the self-service request form linked below: scglobalsales.com/privacyrequest

4 What personal information do we collect about you and how do we use it?

When you register for an account with us, place a bid, create a sale, interact with our digital content on your computer or mobile device, or send us an enquiry, we will collect certain information from you. We will indicate whether this collection involves personal information and, if it does, whether providing your personal information is voluntary or mandatory for the service. Please be aware that where collection is mandatory, we may not be able to provide the relevant products or services to you if you do not provide that information to us. Please select from the different sections of this Privacy Notice to learn more about what personal information we collect and how we use it. If we wish to use your personal information for purposes other than those stated in this Privacy Notice, we will obtain your consent where required by applicable laws.

We may collect the following information:

Contact Information and other identifying information: your name, postal address, phone numbers and e-mail addresses. You acknowledge that we may also obtain information about you as a result of authentication or identity checks (for example in connection with our standard fraud checks when you make a purchase on our Site). We use this information to identify you as a customer, to process and manage your order, to deliver products and services, to process payments, to update our records and to generally manage our relationship with you, including your customer account under our terms with you.

We may also use your contact information to send you marketing communications and display advertising and to contact you in relation to service-related matters, including to assist you in relation to prospective purchases on our Site and, on occasion, to request and respond to feedback relating to **SC Europe**. This feedback may relate to matters including **SC Europe's** brand and services and/or your experience and satisfaction with **SC Europe**, including on our Site. We will only use your contact information where permitted to do so in accordance with applicable laws or if we have your consent to do so (if required by applicable laws).

Payment Information: information related to your credit card, debit card, and/or other payment information to process payments in connection with your purchases. We do not store your payment card details, as we use third-party payment processing services.

Our payment processors adhere to the PCI-DSS standards set by the PCI Security Standards Council.

Other Account and Transactional Information: if you have a customer account, we may also collect information about the species and sales you browse online or purchase, and other information related to your purchases or sales, or which is otherwise relevant to your customer relationship with **SC Europe**. We may use this information to manage your transactions and our relationship with you, for our internal demographic insights into our customers, to offer you an enhanced service according to your preferences, such as identifying relevant products, services and events which may be of interest to you, personalising your experience with **SC Europe** and sharing with you information about your past purchases.

Together with non-personal information, we may also use this information for our internal marketing analysis and demographic studies, to analyse, profile and monitor customer patterns so we can consistently improve our products and services.

Internet and other electronic activity: Where permitted under applicable laws or with your consent (if so required by applicable laws), we may use information about how you use our Site to personalise our communications to you, tailor the advertisements you are shown and/or the content appearing on our Site so as to make the Site and communications more relevant to you. We also use this information to maintain and improve the Site and our services.

We may process information about the device you are using to connect to the services on our Site. This may include the type of device you use, your internet browser, your location based on the unique identifier for your device such as an Internet Protocol address ("**IP address**").

We use this information to ensure the proper functioning and security of our Site to optimise our services to you and to better understand how our content and services are used and their effectiveness.

Location information: When you visit our Site we may seek to determine your country-level location in order to direct you to the appropriate area (internet location) of the Site, based on the region you appear to be visiting the Site from. We will do so using information being transmitted publicly via the internet, including your IP address. Where you request location services provided by us, for example in order to find the nearest sale to you or to provide more precise location based content, we will either: (i) do a look up against

address information given by you, such as using your postcode; (ii) look at the country/region in which you are in according to the unique identifier (e.g. an IP address) for your device; or (iii) if you enable location services on your mobile device, we may establish your real time location relating to the latitude and longitude of your mobile device, through GPS signals, Bluetooth or Wi-Fi connection information including MAC addresses perceived by your device, where this is available. In the case of mobile device location services, you can change your location preferences at any time by managing your device settings.

Inferences: We may create inferences drawn from the categories of personal information described above in order to create a profile about you to reflect your preferences, characteristics, behaviour and attitudes. We use this information to personalise and improve our services and to better understand the interests, to preferences of our key customer audiences, and to provide advertisements about goods and services likely to be of interest to you.

5 Children's Privacy

Our Site is not intended for use by anyone under 18 years of age or a minor in your country or state or region of residence. If you are a parent or legal guardian of a minor from whom you believe we have collected personal information in a manner prohibited by law, please contact us. If we learn that we have collected personal information through our Site from a minor we will comply with applicable legal requirements to delete the information from our records.

6 How do we collect your personal information?

Sources of Personal Information

From You. We collect personal information from you directly. We may also collect personal information from you indirectly, including through your use of our Site and/or where we draw inferences about you (both as described above).

From Third Parties. Transaction-related information may be shared with us by our business partners and other third parties in order to manage and/or support orders, to identify and investigate suspected fraudulent transactions, and to support the security of our services, where permitted in accordance with applicable laws.

Cookies

Cookies are small text files that are sent to or accessed from your web browser or your device's memory. A cookie typically contains the name of the domain (internet location) from which the cookie originated, the "lifetime" of the cookie (i.e. when it expires) and a

randomly generated unique number or another identifier. A cookie will allow us to collect information about your device, such as user settings, browsing history and activities conducted while using the Site. By linking the information in these cookies with other customer information that you provide to us, for example, when you log-in to the Site, we may be able to identify the cookie information related to you.

Most web browsers are initially set up to accept cookies. You can reset your web browser to refuse cookies or to indicate when a cookie is being sent, however, certain features of our Site may not work if you delete or disable cookies. Some of our Service Partners (discussed below) may use their own cookies, anonymous identifiers, or other tracking technology in connection with the services they perform on our behalf.

We inform you where relevant of our use of cookies on arriving at our Site. You acknowledge and agree that by continuing to use our Site or services without managing your cookie and device choices and preferences, you consent to our cookie settings and agree that you understand our **Cookie Policy**. Please be aware that restricting certain cookies will impact on your user experience and may prevent you from using part of our Site.

Please see the **Cookie Policy** for more information about cookies which are used on our Site including information on how you can manage your cookie choices and preferences.

Communications and interactions with SC Europe

Please note that your calls with **SC Europe** can be recorded in order to enable us to better serve our customers, for quality assurance purposes and to ensure an accurate record relevant to any transaction under our terms.

If you contact **SC Europe** by email or phone, **SC Europe** will collect your personal information and use this information to identify you as a customer, help with your query, process your sale/purchase, deliver products and services, process payments, update our records and to generally manage our relationship with you, including your customer account with us under our terms with you. **SC Europe** may also use information to better understand the interests and preferences of our customer audiences.

7 Why are we allowed to collect and use your personal information?

We can collect and use your personal information when one of the following applies:

- To take steps before entering into a contract or perform a contract;
- To follow the law, for example:

- Record-keeping regulatory monitoring and reporting obligations, including those related to adverse events, product complaints and product safety; and
- Complying with anti-corruption and transparency obligations;
- You have specifically given us your permission when such permission is obligatory (the law calls it “consent”). You can withdraw your consent at any time. We will normally need your consent in the following circumstances:
 - Placing cookies on your device to find out how you use our websites so we can personalise what you see by tailoring content and notifications to the things you are interested in;
 - Before we send you certain electronic marketing communications; and
 - In any other situation where personal information processing relies upon your consent.
- We need to use your personal information for legitimate business purposes, for example, to enable us to run our business successfully. These include:
 - Sending direct marketing materials to you (you will always have the right to opt out of marketing and promotional communications);
 - Conducting audits and internal investigations
 - Managing our IT and communications systems and networks;
 - Planning and improving our business activities;
 - Conducting training and gathering feedback for ensuring quality control;
 - Protecting our rights, privacy, safety or property, and/or that of our affiliates, you or others;
 - To provide the functionality of the services we provide you, which includes arranging access to your registered account, and providing you with related customer service;
 - Analysing or predicting your preferences to identify aggregated trends to develop, improve or modify our products, services and business activities;
 - Responding to and handling your queries or requests;
 - Sending administrative information to you, such as changes to our terms, conditions and policies;
 - Completing your transactions and providing you with related customer service; and
 - Reaching out to you to provide information about our products or request input on surveys relating to our products or services;
- For the establishment, exercise or defence of legal claims or proceedings;
- To protect your vital interests or those of others; and
- Because it is necessary for reasons of substantial public interest, on the basis of applicable laws.

8 How do we protect your personal information?

We take reasonable steps to protect your personal information against unauthorized or accidental access, processing, erasure, loss or use. Unfortunately, transmission of information

via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information submitted to us and any transmission is at your own risk.

We do however use strict procedures and security features to try to prevent unauthorised access wherever possible. Personal information may be accessed by persons within our organization, or our third-party service partners, who require such access to carry out the purposes indicated above, or such other purposes as may be permitted or required by the applicable law.

*Personal information provided to **SC Europe** via the Site and online credit card transactions are transmitted through a secure server using Secure Socket Layering (SSL), encryption technology. When the letters "http" in the URL change to "https," the "s" indicates you are in a secure area employing SSL. The Site and the Application use this encryption technology to protect your information during data transport. SSL encrypts ordering information such as your name, address and credit card number. Please note that e-mail is not encrypted and is not considered to be a secure means of transmitting credit card information.*

We are committed to maintaining the security of your personal data it processes. We maintain appropriate physical, procedural, organisational and technical security measures intended to prevent loss, misuse, unauthorised access, disclosure, or modification of your personal data under our control. We also limit access to your personal data within our organisation and to third parties that need access to your information in provision of service to us. They will only process your personal data on our instructions and are required to protect personal data. If you have reason to believe that your personal data is no longer secure, please notify us immediately using the contact information supplied in 'Your privacy Point of Contact' section.

Please be aware that when you transmit information to us or to our service providers over the internet or another telecommunications network this can never be guaranteed to be 100% secure. For any payments which we take from you or pay to you online, we will use a recognised third-party online secure payment system, and we are not responsible for the security of this system. You should contact these third parties for information about the security of these internet, telecommunications systems or payment systems if you need further information.

We cannot guarantee against any loss, misuse, unauthorised disclosure, alteration or destruction of data but we take reasonable steps to prevent this from happening. We have put in place measures to protect the security of your personal data and will notify you and any applicable regulator of a breach where we are legally required to do so.

9 What are your rights regarding your personal information?

You have rights we need to make you aware of. The rights available to you depend on our reason for processing your personal information and the local law in your jurisdiction, and there are exceptions to some rights. Depending on this you may have the right to:

- Withdraw your consent to us processing your personal information for direct marketing purposes;
- Ask SC Europe about the processing of your personal information including to be provided with copies of your personal information;
- Ask us to correct information you think is inaccurate or incomplete;
- Ask us to delete your personal information;
- Ask us to restrict the processing of your information;
- Object to our processing of your personal information;
- Ask that we transfer information you have given us from one organisation to another, or to give it to you; and
- Complain to your local data protection authority.

You can find out how to get in touch with us to ask us to do any of the above by looking at the [‘Your privacy Point of Contact’](#) section.

For your protection, and to protect the privacy of others, we may need to verify your identity before completing what you have asked us to do.

Where we have relied upon your permission to use your personal information, and you later withdraw that permission, we may not be able to complete some of the activities described in [‘What personal information do we collect about you and how do we use it?’](#).

10 How long do we keep your personal information?

We will only keep your customer information for seven years and/or as long as you remain an active customer, or otherwise as required for our business operations or by applicable laws.

We may need to retain certain personal information beyond the relevant retention period to enforce our terms, to comply with legal or regulatory obligations, for fraud prevention, to identify, issue or resolve legal claims and/or for proper record keeping purposes. We may also retain a record of any stated objection by you to receiving **SC Europe** updates for the purpose of ensuring that we can continue to respect your wishes and not contact you further. When the applicable retention period has been reached and/or **SC Europe** no longer requires your personal information for any of the purposes stated above, your personal information will be deleted or destroyed in a manner that cannot be restored or reproduced.

11 With whom do we share your personal information?

Financial institutions, payment processing partners and fraud management solution providers

Payments using our Site are made through our payment solutions providers. You will be providing credit or debit card information direct to our providers who process payment details further.

When you make a payment we may share your information, including details of your transaction, with service providers who provide fraud detection and management solutions related to your transaction, and, in certain circumstances, for the purposes of carrying out sanction screening services.

Where we share your personal information with third parties, we will put in place contractual measures to require those third parties to take reasonable precautions to safeguard your personal information, as required by applicable laws.

Legal disclosures

In certain circumstances (where required or permitted under applicable laws or with your consent (if so required by applicable laws)), we may disclose personal information relating to you to third parties (including in other jurisdictions) in order to conform to any requirements of law, to comply with any legal or regulatory process, for the purposes of obtaining legal advice, for the purposes of credit risk reduction, to prevent and detect fraud, for sanctions screening purposes and/or to protect and defend the rights and property of **SC Europe**. At all times where we disclose your information for the purposes of credit risk reduction, fraud prevention and/or sanctions screening, we will take all steps reasonably necessary to help ensure that it remains secure.

Business or process change partners

In the event that we or a part of our business undergo re-organisation or are sold or licensed to a third party, any personal information we hold about you may be transferred to that re-organised entity, licensee or third party.

Overseas transfers of data

The personal information that you provide through the Site is processed in and is stored on servers in the United Kingdom.

Whether the personal information you provide to us is processed by us or services providers within the U.K. or EEA or outside of it, we will take steps to ensure that your personal information will be afforded the level of protection required of us under and in accordance with this Privacy Notice and applicable data protection laws and in accordance with current legally recognised data transfer mechanisms, such as appropriate EC approved standard contractual clauses (see http://ec.europa.eu/justice/data-protection/international-transfers/transfer/index_en.htm).

12 In what instances do we transfer your personal information outside of your home country?

We work in multiple countries. Therefore, we may need to transfer and use your personal information outside of the country where we collect it from you. We implement appropriate measures to protect your personal information when we transfer your personal information outside of your home country such as data transfer agreements that incorporate standard data protection clauses. The data privacy laws in the countries we transfer it to may not be the same as the laws in your home country. Law enforcement agencies, regulatory agencies, security authorities or courts in the countries we transfer your personal information to may have the right to see your personal information.

13 Additional information if you are in the European Economic Area (EEA)

The European Commission recognises that some countries outside the EEA have similar data protection standards. The full list of these countries is available [here](#).

If we transfer your personal information to a country not on this list, we do so based on [standard contract clauses](#) adopted by the European Commission. These enable us to make international transfers of personal information within SC Europe and meet the data protection laws of the European Union and the General Data Protection Regulation (GDPR).

14 Cookies, Website and Application Data; Use for Analytics and Marketing

Our websites may use cookies and similar technologies. You can choose to accept or decline cookies. If you choose to decline cookies, not all elements of our websites, apps and services may function as intended, so your experience may be affected.

To the extent that your local laws consider the information collected by cookies and other technologies as personal information, we will treat that information to the standards set out in this privacy notice.

We collect information about your computer browser type and operating system, websites you visited before and after visiting our websites, standard server log information, Internet Protocol (IP) addresses, location data, mobile phone service provider, and mobile phone operating system. We use this information to understand how our visitors use our Site so that we can improve the Site and the services we offer.

Our Site uses Google Analytics, a web analytics service provided by Google, Inc. (“Google”). Google Analytics uses cookies to analyse use patterns and may collect information about your use of the website, including your IP address. More information on Google Analytics can be found [here](#). If you would like to opt-out of having your data used by Google Analytics, you can opt out [here](#).

We may use the data you share with us to make decisions about your interests and preferences so we can make the marketing materials we send you more relevant. We may also combine the information we hold about you with data about your interests or demographics that third parties have collected from you online and offline, to make your experience more personalised and further tailor our marketing materials. You have certain rights in relation to this – please see '[What are your rights regarding your personal information?](#)' above for further information.

15 How do we update this Privacy Notice

From time to time, we will update this Privacy Notice. Any changes become effective when we post the revised Privacy Notice on our Site. This Privacy Notice was last updated as of the “Last Updated” date shown above. If changes are significant, we will provide a more prominent notice to let you know what the changes are.

16 Our responsibility regarding websites that we do not own or control.

The Site may from time to time contain links to other websites not controlled by us. We do not accept responsibility or liability for the privacy practices, data collected or the content of such other websites. The operators of these linked websites are not under a duty to abide by this Privacy Notice. If there are terms and conditions, other privacy statements or policies appearing on those websites, you should also review them carefully as your use of those sites may be subject to them.