



## CONFIDENTIALITY AND PERSONAL DATA PROTECTION CHARTER

Artmarket.com and its subsidiaries (the "Company") take the management and protection of your personal data very seriously and take all necessary measures to ensure your personal data is handled and processed in a secure and responsible way.

This Charter presents the means used and the measures taken to collect, process and protect your personal data in accordance with the French law and European regulation on data security.

### Definition and nature of "personal data"

The term "personal data" (also referred to hereinafter as "data") means information that identifies an individual directly or indirectly such as (but not limited to) your first name(s), surname(s), telephone number(s), email address(es), username.

When you register and/or use the Company's websites, we may ask you to submit personal data.

The Artprice databases list information and data, including personal data, collected from the Art Market.

### How do we handle your personal data and to what end?

In general, the Company undertakes to make every effort to ensure your personal data:

- are obtained and handled by lawful and honest means.
- are collected for specific and legitimate purposes and used for those purposes in an adequate and relevant manner that is commensurate with the defined purposes.
- remain at all times available to you so that you may exercise your rights to access, rectify and/or delete your data. You may also oppose, on grounds relating to your particular situation, the use of your data and, where applicable, obtain its portability. You can also stipulate legacy instructions regarding your data.
- are held in accordance with the objectives pursued.
- are subject to all necessary precautions to ensure their safety from degradation, alteration or destruction without your knowledge and to prevent their disclosure to unauthorized parties.

The reasons we collect your personal data are described and defined at the time of collection of the aforementioned data and/or in this Charter. This applies notably to the details you submit when you register on our site or when you decide, for example, to subscribe to our newsletters or ask to receive our promotional offers. A description of the data processing objectives implemented is provided when you submit personal data so you may clearly understand how we use it.

Depending on the consent level and/or the nature of the data provided, the reasons your personal data are collected by the Company may be:

- to provide a tailored response to your needs and requirements,
- to manage your access to certain services available on our site,
- to process your orders and/or subscriptions,
- to keep you informed about our products, services and special offers,
- to send you our newsletter,
- to keep you informed about significant changes in the way our website functions or the way your account is managed,
- to calculate our website audience statistics in order to improve the site and offer an optimal browsing experience,
- to provide our users with quality products and services, and global art market information that is truthful, precise and as comprehensive as possible,
- to prevent fraud or illegal and unethical practices,
- to respect our legitimate commercial, contractual, legal and regulatory obligations.

The personal data the Company needs the users to provide in order to fulfill the purposes described above are indicated by asterisks or other distinctive visual signs (e.g. gray highlights, bold text, etc.) in the different forms, messages and pages of our websites. If you leave these mandatory fields empty, the Company may not be able to meet your requirements and/or provide the requested services. The other information is optional and allows us to know you better and to improve our communications and services to you.

The data entered into our art market information databases are collected for the purposes of providing information that is true, accurate, impartial and as exhaustive as possible regarding public auction sales and the global art market. They are also used to generate statistical analyses of the art market, update our websites and applications, contribute to the prevention of fraud and other unlawful activities, and, more generally, to satisfy any legitimate interest of our Company relating to its legal, accounting, commercial

and contractual obligations.

The Company collects and publishes data concerning artists in order to promote them and their works. The data collected and published by the Company concerning artists are provided either by the artists themselves, their representatives and art market professionals such as auction houses, or taken from sources that are accessible to the public.

## The personal data controller

The personal data controller for all personal data collected on the Company's websites is Artmarket.com, headquartered at Domaine de la Source, 69270 Saint Romain au Mont d'Or, France, and registered with the Lyon Companies Register under number 411 309 198.

To exercise your individual rights to access, rectify, delete or restrict the use of your data, you can modify your customer profile under "My Account" or contact the personal data controller by email at [rgdp@artprice.com](mailto:rgdp@artprice.com) or by mail at the above-mentioned address.

The personal data communicated to you under your personal data access rights will be communicated to you personally and confidentially. Therefore, please make sure to include documents that will allow us to formally identify you in any request to exercise your personal data access rights.

For any questions regarding personal data protection you may also contact your relevant National Data Protection Authority (in France, that is the Commission Nationale de l'Informatique et des Libertés : <https://www.cnil.fr/fr/vous-souhaitez-contacter-la-cnil>).

## Who gets to handle the collected data?

The persons with access to your personal data (within the limits of their respective mandates and for the purposes previously indicated to you) are the Company's (or any other entity that might result from any future corporate action involving the Company) sales and marketing team, its IT department, its administrative services, its editorial services and its auditing and compliance services (auditors, internal compliance officers, etc.).

The publicly available data on the auction sales we follow around the world and which is collected and analysed in our art market information databases as well as the data communicated by the artists themselves, their representatives or art market professionals, is destined for the users, clients and partners of artmarket.com.

Certain elements of your personal data may be disclosed to judicial and administrative authorities upon request. They may also be handled by technical service providers or services (transporters and delivery services, payment platforms, trusted third party, etc.). Any such third parties contracted by the Company are formally prohibited from using the data we collect for purposes other than for the performance of the service(s) contracted by the Company and/or for the sole purpose of performing the service.

In the case where your data is communicated to a service provider located outside the European Union (transporters and delivery services, payment platform, trusted third party, etc.), for the purpose of carrying out our services, the transfer will only be made after appropriate contractual guarantees regarding data security have been signed in accordance with existing regulations.

## Personal data retention periods

The personal data provided by our users will be kept for the period required to manage our business relationship with you or, in the case of marketing operations, for the period that your data is necessary for the completion of these operations.

We also keep your personal data for the period provided for by law, notably civil and commercial law, and/or until the end of a final court decision in the case of litigation.

At the end of these periods, the Company may contact you to ascertain whether or not you wish to continue receiving communications on offers, news and events concerning the Company.

Beyond this period, the data may be kept for purely historic, scientific or statistical purposes and will not be used for any other purpose of any kind whatsoever.

Your personal data will also be destroyed within a maximum period of 30 days from your request to unsubscribe.

The personal data processed for use in our databases will be kept for the period required to achieve the above-mentioned purposes and for the pursuit of our legitimate activities and interests. It may also be used in response to government, fiscal, administrative, legal and/or judicial inquiries in compliance with existing legislation and regulations.

## Security of your data

The Company protects your personal information by implementing security measures to protect your personal data from unauthorized access, misuse, disclosure, loss or destruction.

However, it is your responsibility to make sure the computer you are using is secure and adequately protected against malware such as Trojans and viruses. You are informed that without adequate security measures (e.g. secure configuration of your web browser, updated anti-virus programs, firewall software) or by downloading a software from dubious sources, you expose yourself to the risk that the data and passwords you use to protect your data may be disclosed to unauthorized third parties.

## Cookies

The provision of our online services requires the use of cookies. Temporary session cookies are used to facilitate your navigation, while functionality cookies, with a lifespan of 365 days, are used to preload your identifier and display preferences in order to optimize your consultation of the website. The information uploaded by these cookies is never transmitted to third parties.

Similarly, our online services use third-party cookies (eg. [Google Analytics](#)) to improve the products and services offered while preserving users' anonymity (no personal data is provided to Google Analytics by Artprice).

By continuing to browse this website, you agree to our use of cookies under the conditions detailed below. These cookies are essential for the proper functioning of the website, for the production and improvement of the services offered and for the data security of both users and the website itself.

#### • Definition

Cookies are small data files placed on the Internet user's device and used by the visited website to send information to the user's web browser, which can then send certain information back to the original site. They usually contain the name of the server that placed the cookie, an identifier in the form of a unique number and an expiration date.

Cookies allow the storage, for their respective lifespans, of information concerning the different pages of a website visited and the frequency of subsequent visits to the website.

Only the creator of a cookie can read or modify the data it contains.

#### • Purpose

The Company uses cookies in order to adapt its services to the users' needs. Cookies serve two main purposes:

- to enhance user navigation,
- to ensure the proper functioning and security of the website.

#### • Use of cookies by the Company

The following cookies are used on our website:

- session cookies which record technical information concerning how our Website is navigated and which disappear as soon as the User leaves the Website,
- functional cookies allowing Users to be recognized upon subsequent visits to the website and adaptation of users' experience accordingly. These are permanent cookies which remain on the users' devices until the expiration of their lifespan (365 days) or their blockage/deletion via the web browser's cookie control settings.
- Google Analytics audience measurement cookies: these cookies are used to gather aggregate and anonymous information about website users and are essential for the conduct and improvement of the services offered to users of our website.

You can consult Google's privacy policy via this link <https://support.google.com/analytics/answer/6004245?hl=en>

#### • Consent - deletion and control of cookies

Users may block or deactivate cookies in several ways.

Most web browsers have a default cookie control configuration. However, Users may deactivate, block or withdraw consent to their use. Users may accept or refuse cookies on a case-by-case basis or block them at a general and systematic level.

To block the use of cookies, go to your web browser settings and follow the recommended procedures (the following links give access to the settings of: [Internet explorer](#), [Firefox](#), [Google chrome](#), [Safari](#)).

Please note that the configuration of your web browser to refuse all cookies (including strictly necessary cookies) may prevent you from accessing certain parts of this website and/or may affect your user experience.

You can express or modify your wishes in terms of cookies at any time: [click here](#).

#### Consent

When you choose to disclose your personal data to the Company, you expressly give your consent to the collection and use of your personal data in accordance with this Charter and existing legislation.

#### Modifications

We reserve the right, at our sole discretion, to modify this Charter at any time in part or in whole. Any modifications will be effective as of the publication of the new Charter on the Site. We invite you to check this page regularly to ensure you agree with any changes. We may also inform you of changes to this Charter by email.

*Updated on 21 May 2021*