



# PRIVACY POLICY

October 2023

## PRIVACY POLICY

This document contains the following points regarding personal information, as well as a glossary, which we suggest you read for a better understanding of specialized terms:

- General provisions.
- Terms and Definitions.
- Information collected by ONEBID ASSET.
- Reasons and purposes for processing personal data.
- To whom the information is provided.
- Requesting personal information from the client.
- Security measures.

### GENERAL PROVISIONS

ONEBID ASSET LLC (“ONEBID ASSET”, “Company”, “we” or “us”) is committed to protecting the privacy of our clients and takes its data protection responsibilities seriously.

This Privacy Policy describes how ONEBID ASSET collects and processes your personal data.

By providing personal information, clients agree that we have the right to process personal data for the purposes described in this Policy or to comply with regulatory and legal obligations.

Subject to this Privacy Policy, the Company is committed to protecting all personal information collected and/or processed. Therefore, to fully understand ONEBID ASSET Privacy Policy, you must read this document.

If you are a customer or user of our services, this Privacy Policy applies in conjunction with any terms of business and other contractual documents, including, without limitation, any agreements we may enter into with you.

If you are not a relevant stakeholder, customer or user of our services, but are using our website, this Privacy Policy also applies to you.

### TERMS AND DEFINITIONS

**Personal data** is data that identifies or relates to an identifiable natural person. This includes data you provide to us, data that is collected about you automatically, and data we receive from third parties.

**Client** – any individual who has used or wishes to use the Company’s services.

**Processing** refers to any operation or any set of operations performed on personal information, including, but not limited to, collecting, recording, organization, storage.

**Services** – all types of services provided by the Company.

### INFORMATION COLLECTED BY ONEBID ASSET

For the purposes of this document, the following information is collected by ONEBID ASSET:

- personal identification data of individuals including full name, gender, date of birth, citizenship, nationality, marital status, signature, taxpayer identification number, utility bills and other identification document details, as well as photographs and videos of you;
- government IDs: government identification documents such as passport, national identification number, national identity card (ID) details, driver's license;
- contact information: home address, telephone number, email address and other information if necessary;
- financial information: bank account number, bank account balance, payment card information, annual income, information about transactions you make using our services and other similar information;
- work history: information regarding place of work, level of education, business activity, letter of reference from the employer;
- information about communications with the client: survey responses, information contained in the survey, communication with us, including recordings of conversations with our customer service team;
- information collected automatically when you use the Company website;
- technical information and unique identifiers: Internet Protocol (IP) address, login information, browser information, time zone, etc.;
- cookie data used by the Company's websites and mobile applications.

## **REASONS AND PURPOSES OF PROCESSING PERSONAL DATA**

We collect information for the following purposes to provide better services to all our users:

- The processing of personal data is necessary for the conclusion and execution of the agreement as well as to create and maintain your account. This includes where we use your personal data to accept and process orders and process payments. The consequence of not processing your personal data for such purposes is that you will not be able to open an account with us or that your account will be terminated if you already have one.
- Compliance with legal and regulatory requirements. Processing is necessary to comply with our legal obligations under applicable laws and regulations, as well as anti-money laundering and anti-terrorist financing laws and regulations.
- Most of our core services are subject to strict and specific laws and regulations requiring us to collect, use and store certain personal data and process personal identification information and, in some cases, sensitive personal data. For example, to comply with our KYC (“Know Your Customer”) obligations under applicable laws and regulations, and in particular to comply with anti-money laundering laws and regulations.
- If you do not provide the personal information required by law, you may not be able to open an account, or we may have to close your account if you already have one.
- To ensure the safety, security and integrity of our platform. We process your personal data for the purposes of enhancing security, monitoring and verifying identity or access to services, combating malware or security threats, and complying with applicable laws and security regulations. We process your personal information to review accounts and related activity, detect and resolve violations of our agreements and policies, investigate suspicious activity, detect, prevent and combat illegal behavior, detect fraud and maintain the integrity of our services.
- Communication with the client regarding service and transaction issues. We use your personal information to communicate with you regarding administrative information, including policy updates and changes to the terms of your customer or any other agreement or account information. We will communicate with you to keep you informed about our services, such as informing you of relevant security issues, updates, or providing other transaction-related information. Without such

communications, you may not be aware of important events regarding your account that may affect how you can use our services. You may not opt out of receiving important service communications, such as emails or mobile notifications sent for legal or security purposes. Among other things, we process your personal data when you contact us to provide support regarding questions, disputes, complaints, troubleshooting, etc. Also, personal data may be used by us for the purpose of providing the client with information about services, products, training materials, upcoming events and other relevant information that may be useful to the client in relation to the Company's offers and other resources.

## **TO WHOM THE INFORMATION IS PROVIDED**

- Government bodies and institutions. We release accounts and other personal information when we believe release is necessary to comply with the law or our regulatory obligations, enforce or apply this Policy and other agreements, or protect the rights, property or safety of the Company, our users or others. This includes exchanging information with other companies and organizations to protect against fraud and reduce credit risk. Information on the subject of this Privacy Policy is provided to relevant institutions only during legal proceedings and/or in response to a proper order/request from competent authorities.
- Third Party Service Providers. We employ other companies and individuals to perform functions on our behalf. Examples include analyzing data, providing marketing assistance, processing payments, delivering content, and assessing and managing credit risk. These third-party service providers only have access to the personal information necessary to perform their functions and may not use it for other purposes. In addition, they must process personal information in accordance with our contractual agreements, including non-disclosure agreements, and only in accordance with applicable data protection laws.

## **REQUESTING PERSONAL INFORMATION FROM A CLIENT**

Under certain conditions, you may do any of the following with respect to your personal information:

- requesting access to your personal information held by ONEBID ASSET;
- request to complete incomplete information or correct incorrect information available to ONEBID ASSET;
- request to delete or erase personal information; in this regard, ONEBID ASSET will consider your request and will only remove or erase information to the extent permitted by law and inform you accordingly;
- statement of dissatisfaction with the collecting, storage, processing and distribution of personal information in cases where these actions require your consent in accordance with the law; in this regard, ONEBID ASSET will consider your request and will only act within the legal requirements and will inform you accordingly

As previously mentioned, lack of access to some information may interfere with the provision of all or some of the services, or the proper functioning of the site or program.

## **SECURITY MEASURES**

ONEBID ASSET takes all necessary security measures to ensure that the data/personal data collected and stored in connection with your visit to the website and/or in connection with the services provided by ONEBID ASSET is protected from any risk, including unauthorized access, misuse and loss.



We recommend using a unique password for your ONEBID ASSET account and logging out when you are finished using a computer.

Access to the personal non-public information you share with us is limited to certain Company employees, agents and affiliates who have a need to know such information in connection with the services the Company provides to you.

We maintain strict employment policies that prohibit employees with access to your personal, non-public information from using or disclosing such information except for business purposes.

ONEBID ASSET provides you with services using the latest technology and security standards.

Any transmission of data over the Internet is at your own risk, although we will use all security measures to protect your personal data. Please note that all your activities while using this website may be recorded and analyzed for various purposes, including security, marketing and system monitoring purposes