

Privacy Statement 10/10/2018

1. Scope of Privacy Statement

This Privacy Statement describes how **ARI AUCTIONS.** and its affiliates (“we,” “us,” “our,” or the “Company”) handle your personal information when you use the Company’s websites (including www.ariauctions.com or any other website where this Statement is posted), tools, applications (including mobile applications), and other services (“Services”). By using the Services, you expressly consent to our collection, storage, use and disclosure of your personal information as described in this Statement.

2. Collection of Your Information

Personal Information. We do not collect personal information (such as names, addresses, telephone numbers, email addresses, or financial account information) from you when you browse the Services, unless you have specifically and knowingly provided us with personal information, e.g., by registering to create an account, entering the bidding process, completing online forms, or entering into a transaction with us. We use this information to provide the Services and as discussed in this Privacy Statement.

Automatically-Collected Information. We may automatically collect information about the computer or devices (including mobile devices) you use to access the Services. We may use third party analytics providers and technologies, including cookies and similar tools, to assist in collecting this information. We may use this information to formulate statistical models about use of the Services, enhance the Services for our users, and provide you with tailored content.

Our Use of Cookies. We do not use cookies to obtain or retain any personal information about you apart from what you voluntarily provide us. Most web browsers automatically accept cookies, but you may set your browser to block cookies (consult the instructions for your particular browser on how to do this). Please note that if you decide to block cookies, this may interfere with your ability to perform certain transactions, use certain functionality, and access certain content on the Services.

3. Use of Your Information

We will use your information for the purpose for which you provided it, and we may also use your information for a number of purposes such as to:

Create and maintain your account or registration information;

Enhance the user experience;

Perform research and analytics;

Customize and personalize the content and advertising that you see on the Services;

Respond to and fulfill your requests for services (including qualification to make bids);

Determine your eligibility for certain auctions or services;

Send you information about topics that may be of interest to you; and

Send you communications related to your account and to alert you to the latest developments and features of the Services.

4. Disclosure of Your Information

We may share your information in the following ways:

We may make information collected through the Services available to subsidiaries and affiliated companies that are under common ownership or control within the www.ariauctions.com family.

If you download information on assets listed on our Services or place a bid on a particular asset, the seller and its affiliates and representatives are given access to your information.

We may share your information with any person or entity where we believe in good faith that such disclosure is necessary to: (a) comply with the law or in response to a subpoena, court order, government request, or other legal process; (b) produce relevant documents or information in connection with litigation, arbitration, mediation, adjudication, government or internal investigations, or other legal or administrative proceedings; (c) protect the interests, rights, safety, or property of the Company or others; (d) enforce the Terms of Use on the Services; (e) provide users of the Services with the services they request; (f) provide you with special offers or promotions from us; (g) allow another company that acquires the Company or some or all of its assets to continue to serve you; or (h) operate the Company's systems properly.

We may use and share non-personal information about you or use of the services, including any de-identified and aggregated data with third parties without limitation.

5. Opting Out of Emails

To receive promotional email communications, users must voluntarily sign up on the website either by creating a profile or by choosing contact preferences. From time to time we may send you email notices or news updates alerting you to new features, products, promotions, or services pertaining to www.ariauctions.com offerings. If you no longer wish to receive promotional materials from us, you may opt out of receiving these communications by contacting us at info@ariauctions.com. We will gladly comply with all requests for removal. Certain transactional emails such as confirmations of bidder registration are not included in emails that one can opt out of.

Please note that these opt-out processes may take some time to complete, consistent with applicable law.

6. Security and Account Protection

We have implemented commercially reasonable physical, administrative, technical, and electronic security measures to protect against the loss, misuse, and alteration of your personal information. Despite our best efforts, however, no security measures are perfect or impenetrable. We appreciate your help in safeguarding the integrity of your own and others' privacy. We encourage you to let us know immediately if you suspect that any personal information you shared with us is being used contrary to this Privacy Statement.

7. Accessing, Reviewing, and Changing Personal Information

We will take reasonable steps to ensure that the information and data on the Services is complete and accurate. If your personal information changes, is inaccurate, or if you no longer wish to use the Services, contact us at info@ariauctions.com to correct or update the information.

8. Third Party Links and Services

The Services may contain links to third-party websites, including social networking websites. Your use of these features may result in the collection or sharing of information about you, depending on the feature. Please be aware that we are not responsible for the content or privacy practices of other websites or services to which we link. We do not endorse or make any representations about third-party websites or services. The personal information you choose to provide to or that is collected by these third parties is not covered by our Privacy Statement. We strongly encourage you to read such third parties' privacy statements.

9. Amendments to Privacy Statement

We may amend this Privacy Statement at any time by posting the amended terms on the Services. Any changes to this Statement will become effective upon posting. Your continued use of the Services following these changes means that you accept such revisions. If we make any material changes to this Privacy Statement, we will post the changes here and notify you either via email or by notice on the Services.

10. International Transfers of Information

Some of the uses and disclosures mentioned in this Privacy Statement may involve the transfer of your personal information to various countries around the world that may have different levels of privacy protection than your country. By submitting your personal information, you consent to such transfers.

11. Contacting Us

Should you have any questions about this Privacy Statement, contact us by sending an email to **info@ariauctions.com** . Please provide your name, mailing address, telephone number and email address so we can service you more quickly.

We may record the conversations our agents or employees have with you. We may do this from time to time to monitor the quality of service and accuracy of information our agents and employees give to you and to ensure that your instructions are followed. No agent or employee of the Company is authorized to waive any provisions of our Company policies and procedures.