

# PRIVACY POLICY

Effective Date: July 2024

Trademore Services LLC (“Trademore”) values your business and is committed to protecting your privacy. This Privacy Policy sets forth our policies and practices for the collection, use and sharing of information we collect when you use our website Trademore.com (the “site”) and our services.

## I. COLLECTION OF INFORMATION

We, and service providers acting on our behalf, collect information when you interact with us by using our site, contacting us, and using our services.

***We collect information you provide directly to us.*** This includes:

- Your contact information, such as full name, email address, mobile phone number, and physical address;
- Make, model, carrier and condition of your device;
- Account and financial information;
- Correspondence you send to us; and
- Information about your activity on our sites.

***We collect info when you contact us.*** When you contact us or we contact you, we may monitor or record that communication for quality assurance, training and security purposes.

***We collect information when you visit our site, including through cookies and similar technologies.*** We, and third party companies acting on our behalf, collect information from our site, such as the date and time of your visit, information about the links you click and pages you view within the Site, pages that you view before and after visiting our site, your Internet protocol (IP) address, Internet service provider, device and advertising identifiers, screen records, browser type, operating system, platform type, connection speed and other attributes. We, and these third party companies, may use cookies, pixels, tags, web beacons, embedded scripts, application programming interfaces (APIs), and similar technologies to collect this information. Cookies are small bits of information that are stored by your computer’s web browser. Pixel tags are very small images or small pieces of data embedded in images, also known as “web beacons” or “clear GIFs,” that can recognize cookies, the time and date a page is viewed, a description of the page where the pixel tag is placed, and similar information from your computer or device. Embedded scripts are programming language used to

add interactivity to websites. Web beacons may be used to place advertisements, and web beacons and embedded scripts can be used to understand website traffic patterns and the number of visitors to our website, and to measure the effectiveness of advertisements or email advertising messages. We use the information collected by these technologies to analyze visitor activity on our site, to understand website traffic patterns and engagement, administer and maintain our site and for site functionality, measure advertising effectiveness, and for other business purposes.

The Trademore site may also include social network or other third-party cookies, plug-ins, pixels, or other similar technologies and widgets that may provide information to their associated social networks or third parties even if you do not click on or otherwise interact with the plug-ins and widgets. We also collect information from these entities when you use them to sign up for our services.

***We collect information about you from others.*** In addition, if you access third-party services, such as Facebook, Google, or Twitter, through the site or to share information about your experience on the site or our services with others, we may collect information from these third-party services.

## **II. USE OF INFORMATION**

We, and service providers acting on our behalf, generally use the information we collect to:

- Fulfill your requests for products, services, information and support;
- Send you promotional materials or advertising from us or on our behalf;
- Analyze the use of and visitor activity on our site and user data to understand website traffic patterns and engagement, measure advertising effectiveness, and improve the site and our services;
- Fraud and security purposes, and to prevent potentially prohibited or illegal activities and otherwise in accordance with our Terms of Use available in our “Terms and Conditions” for our site and services;
- Authenticate you; and
- For any other purposes disclosed to you at the time we collect your information or pursuant to your consent.

We also allow third-party advertising companies to collect information about your activity on our site through cookies, pixels, and other similar web technologies, to help us provide more relevant Trademore advertisements on others’ sites and apps. These ads may be tailored for you based on your activity on our sites and combined with your

activities on other websites and in apps where these advertising companies are present. These advertising companies may also use information they collect for others' advertising purposes. The use of information collected about your visits over time and across different websites, apps and devices is known as cross-context behavioral or interest-based advertising. You can learn about opting out of interest based advertising in the Your Choices section below.

### III. DISCLOSURE OF INFORMATION

We are committed to maintaining your trust, and we want you to understand when and with whom we may share the information we collect.

- **Authorized service providers and partners.** We share your information with service providers and partners who help us with specialized services, including email deployment, marketing, and data processing. This includes services provided by others to help us with analytics and the functioning of our website, including, without limitation, [Google Analytics](#), which may include storing and accessing cookies and other information on your computer or wireless device.
- **Business transfers.** We may share your information in connection with a substantial corporate transaction, such as the sale of a website, a merger, consolidation, asset sale, or in the unlikely event of bankruptcy.
- **Legal purposes.** We may disclose information to respond to subpoenas, court orders, legal process, law enforcement requests, legal claims or government inquiries, and to protect and defend the rights, interests, safety, and security of Trademore, our affiliates, users, or the public.
- **With your consent.** We may share information for any other purposes disclosed to you at the time we collect the information or pursuant to your consent.
- **Third Parties, including social media and advertising company partners.** We allow our advertising partner third-parties to collect information directly from you about your activity on our site through cookies and other similar web technologies in order to tailor advertising to you. You can learn about opting out of this activity in the Your Choices section below.

If you access third-party services, such as Facebook, Google, or Twitter, through the site or to share information about your Trademore experience or with the services with others, these third-party services may be able to collect information about you, including information about your activity on the Site, and they may notify your connections on the third-party services about your use of the Site, in accordance with their own privacy policies.



## IV. DATA SECURITY & RETENTION


Our policy is to retain personal information as long as it is needed for business, tax, audit, investigative, legal and security purposes. We use reasonable technical, administrative and security measures to help protect information from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. In addition, we train our employees on the importance of privacy and security, as well as proper ways to access, use and disclose customer information. You should understand that no data storage system or transmission of data over the Internet or any other public network can be guaranteed to be 100 percent secure.

## V. YOUR CHOICES

You have choices about certain ways we use and share information about you.

**Marketing.** You have choices about receiving marketing from Trademore. If you would like to be removed from Trademore’s email marketing list, you can opt out by following the unsubscribe instructions, usually found at the bottom of the emails.

**Website information used for interest based advertising.** You have a choice about whether certain information collected on websites, including Trademore’ site, is used to customize advertisements you see on the internet. We do not currently respond to Do Not Track signals in your web browser settings. However we do honor Global Privacy Control signals you may set in your browser. Please visit [Your Privacy Choices](#)   for more information about how your information may be sold, shared or used for certain targeted advertising and how you can opt out.

You can also visit the industry-wide [Digital Advertising Alliance opt-out page](#) to learn more and opt out. Additionally, you will see an icon  in or around online advertisements placed using interest-based advertising techniques. You can click on the icon to learn more and opt out. You can also opt out of the use of your device identifiers for interest-based advertising by selecting “Limit Ad Tracking” or “Opt out of Interest-Based Ads” in your device Settings.

## VI. STATE PRIVACY RIGHTS

### CALIFORNIA

#### The California Consumer Privacy Act

The California Consumer Privacy Act, or CCPA, gives you specific rights as a California resident.

This law provides you with the right to know what information we collect about you and how we use it; to access, delete, and correct that information within certain limitations;

to tell us not to sell or share personal information about you; to limit the use of certain sensitive personal information; and to not be discriminated against for invoking these rights.

**You have the right to know what personal information we collect, how we use it, and how long we keep it.**

We describe the personal information we collect, and how we use it, in this Privacy Policy. We, and service providers acting on our behalf, collect personal information when you interact with us, use our services, from your activity on our site, and from third parties. California law requires that we also describe the categories of personal information we collect and use and the sources of that information. Depending on how you use our services and how you interact with us, we may collect these categories of personal information:

- Identifiers, including, name, address and email address, mobile device identifiers, IP address, and other similar identifiers;
- Commercial information, such as records of products your purchase or our services, and financial information used for your transactions;
- Financial information such as credit or debit card information you use as your payment method for your transactions with us;
- Internet or other electronic network activity information, including website activity, browsing history, search history on our site, and information regarding your interaction with our site;
- Contents of your correspondence with us;
- Secure Account Information including account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials;
- And other information that may identify, relate to, describe, or is capable of being associated with you.

We use this information for business and commercial purposes as they are defined by the CCPA. Business and commercial purposes include providing services to you; communicating with you and providing customer service; personalizing your experiences; improving our services; providing marketing and advertising; debugging; auditing our processes and services; short-term transient uses; research; and security, fraud, and legal compliance purposes. Examples and additional detail about these types of uses can be found in this Privacy Policy.

Some of the information we collect may be considered sensitive personal information under this California law which defines sensitive information to include account log-in information with required security or access codes; financial account, debit or credit card number along with required security or access code, password, or credentials allowing access to an account; precise geolocation when you allow it in our app; and the contents of your mail, email, and text messages unless we are the recipient of the communication. We do not use, sell, share, or disclose sensitive personal information, as defined by California law, for any purpose other than to provide services requested by you, with your consent, or for other purposes expressly authorized by California law, such as to detect security incidents.

We share information with service providers that may use information for the same purposes, as necessary for them to perform work for us. Service providers are required to protect the information we share with them or they collect on our behalf and use it only for the specific purposes that we allow. We may also disclose information to third parties, such as partners and to law enforcement, among others, as detailed elsewhere in this policy.

We may also disclose information with your consent and as further described in other sections of this policy.

Our policies require that we retain records for as long they are needed for legal, tax, audit, investigative, and/or security purposes and then securely delete or destroy them. We incorporate personal information into different types of records; it is not always retained by distinct data elements. For example, your name could be part of your customer account record, transaction record, or call records. Each type of record may be retained for a different time period depending on its purpose. We have established criteria for how long to keep different types of records.

We allow select third parties to directly collect information about your activity on our site using cookies and other similar web technologies. These third parties use information they collect to help us provide more relevant Trademore advertisements on other websites and apps and may also use information for their own or others' advertising purposes. For information about how to opt out of these activities, please visit the "Your Right to Opt Out of Sale or Sharing of Personal Information" section below.

**You have the right to access or correct information.**

You have the right to request access to specific pieces and categories of personal information we collected about you in the past 12 months. You can exercise your right to access by submitting a request through the [Trademore privacy dashboard](#) or by sending an email to [privacy@trademore.com](mailto:privacy@trademore.com). We will honor up to two consumer rights requests every twelve months as required by California law.



## **You have the right to request to delete information.**

You have the right to request that we delete personal information we have about you unless we need it for specific reasons allowed by the CCPA. These reasons include: needing the information to provide the services you have requested and other activities needed to maintain ongoing business relationship with you, to maintain information security, to exercise legal rights and to comply with other laws. All the personal information we retain today is only used for these purposes. We retain the information that we collect only as long as needed for these purposes and then securely delete it. You can submit a request to delete by sending an email to [privacy@trademore.com](mailto:privacy@trademore.com).

## **Your right to opt out of the sale or sharing of personal information**

The California law gives you the right to opt out of the sale or sharing of personal information. The term “sale or sharing” is broadly defined to include sharing personal information for monetary or other valuable consideration and the sharing of your information for cross contextual advertising purposes. This definition does not cover all sharing of personal information. We do not have actual knowledge that the personal information of consumers under 16 years of age is included in this selling or sharing.

Our activity that falls under the definition of “sale or sharing” under California law includes using third-party advertising companies that collect information about your visit to our website using cookies and other web technologies to inform our and others’ cross contextual advertising.

To opt out of the use of your information for this activity please visit [Your Privacy Choices](#)  . We also recognize when you exercise your choice to opt out using a browser-based [Global Privacy Control](#) (GPC). If you are logged in to your Trademore account and you make your choice on the Your Privacy Choices page or your browser GPC signal is set, we will apply your choice whenever you are logged in on our site. If you are not logged in, or don’t have an account and use a GPC, we will opt you out of the “sale or sharing” activity described above, for the browser on the device you are using to visit our sites. You will need to repeat the opt out process if you visit our page from another browser or device, or if you clear cookies from the cache in your browser.

## **You have the right to limit the use of sensitive personal information.**

You have the right to ask us to limit the use and disclosure of sensitive personal information if we use that information for purposes beyond what is needed to provide the products and services you request or for other reasons specified in the law. The purposes for which we might use sensitive personal information include: detecting security incidents; resisting malicious, deceptive, fraudulent or illegal actions; ensuring the physical safety of a person; short-term, transient uses; performing services such as maintaining or servicing accounts, providing customer service, fulfilling orders and

transactions; verifying your information; and verifying, maintaining or enhancing a service on a device that is owned manufactured or controlled by us or on your device. We use or disclose sensitive personal information only for purposes allowed by the law or with your consent, so we do not offer you an option to limit the use of sensitive personal information.

### **Your Right to Not Be Discriminated Against**

We do not discriminate against you if you exercise any rights described in this section. We will not deny goods or services, charge different prices or rates for goods or services, or provide you a different level or quality of goods and services.


### **Where to Exercise Your Rights**

You can exercise your right to access or correct data by submitting a request through the [Trademore privacy dashboard](#) or by sending an email to [privacy@trademore.com](mailto:privacy@trademore.com). You may submit a request to delete personal information by emailing us at [privacy@trademore.com](mailto:privacy@trademore.com).

We require you to verify your identity using the processes described in the dashboard before we fulfill your request.

We endeavor to respond to your requests within 45 days, but it may take up to 90 days. If we need more than 45 days, we will contact you to let you know that we need additional time.

You can authorize an agent to exercise your California privacy rights on your behalf. To designate a California business or individual as your agent, we first must verify your identity. Simply log-in to the [Trademore privacy dashboard](#) with your credentials, or with your order number and email address, and follow the instructions for exercising your privacy rights. There you will receive instructions on how to assign an authorized agent for your account.

To opt out of “sale or sharing”, please visit Your Privacy Choices  or enable a GPC signal on your browser when visiting our site.

If you have questions about any of your rights under California law that are described above, you can email us directly at [privacy@Trademore.com](mailto:privacy@Trademore.com).

### **Reporting**

**California law requires businesses to report annually on the number of privacy requests they receive each year. Trademore received the following requests from consumers in 2023.** Trademore did not receive any requests from employees or contractors.



	Request to Delete*	Request to Know	Request to Correct	Do Not Sell, Share, & Target**
Total Requests	N/A	1	2938	65
Complied With	N/A	1	2938	65
Denied	N/A	N/A	N/A	N/A
Average Response time	N/A	<1	<1	<1

\*Because all personal information collected from users is required to provide service, consumers and other individuals do not have the option to delete personal information.

\*\* These numbers include the number of requests received through a Global Privacy Control, the number of visits to TradeMore’s Your Privacy Choices page from January 1 through June 30, 2023, during which consumers were directed to the Digital Advertising Alliance to exercise their ad choices, and the number of requests received through TradeMore’s opt-out mechanism from July 1 through December 31, 2023.

**Other California Privacy Rights**

California customers may request, once per year, that we disclose the identity of any third parties with whom we have shared personal information for the third parties’ direct marketing purposes within the previous calendar year, along with the type of personal information disclosed. If you have any questions about your rights under this law, email us at [privacy@trademore.com](mailto:privacy@trademore.com)

California residents under age 18 who are registered users of our site, may request and obtain removal of content or information they have publicly posted. Your request should include a detailed description of the specific content or information to be removed. Please be aware that your request does not guarantee complete or comprehensive removal of content or information posted online and that the law may not permit or require removal in certain circumstances.

**COLORADO, CONNECTICUT, OREGON, TEXAS, UTAH AND VIRGINIA**

Colorado, Connecticut, Oregon, Texas and Virginia have comprehensive privacy laws that provide residents with additional specific rights. Oregon and Utah residents may also have rights.

**Your Right to Know Personal Information We Collect, How We Use and Share It, and How Long We Keep It**

We describe the personal information we collect and how we use it in this Privacy Policy. We collect personal information when you interact with us and use our services, from certain third-party sources and from your activity on our site. Depending on what services you use and how you interact with us, we may collect these categories of personal information for the following purposes:

<p>Contact and personal identifiers including name, billing and email address, mobile device identifiers, IP address, account credentials, other similar identifiers.</p>	<p>We use this information to provide our services, complete transactions, operate our business, communicate with you and provide customer service; improve our services; provide marketing and advertising; create business insights; debug problems, audit our processes and services; short-term transient uses; research; and security, fraud, and legal compliance.</p>
<p>Commercial information, such as records of products you purchase or our services, and financial information used for your transactions with us.</p>	<p>We use this information to provide our products and services, operate our business, communicate with you and provide customer service; personalize your experiences; improve our services; provide marketing and advertising; create business insights; debug problems, audit our processes and services; short-term transient uses; research; and security, fraud, and legal compliance.</p>
<p>Internet or electronic network activity (including search history on our site, and information regarding our interactions with</p>	<p>We use this information to operate and improve the functioning of our website, analytics and ad measurement, improve</p>

<p>our site and advertisements).</p>	<p>our services; provide marketing and advertising; create business insights; debug problems; audit our processes and services; short-term transient uses; research; and security, fraud, and legal compliance.</p>
<p>Secure Account Information including account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account.</p>	<p>We use this to provide you with access to your account, accept payment for your transactions and services you purchase, security and fraud prevention and legal compliance purposes.</p>
<p>Other information that may identify, relate to, describe, or is capable of being associated with you.</p>	<p>We use this information to the extent necessary to provide services to you, provide you with access to your account, accept payment for products and services you purchase, communicate with you and provide you with customer service, security and fraud prevention and legal compliance purposes, and for the purpose you provided it for.</p>

We may share information with service providers (also known as processors) who may use information for the same purposes, as necessary for them to perform work on our behalf. Service Providers are required to protect the information they receive from us or collect on our behalf and use it for the specific purposes that we allow. We may also disclose information for legal compliance, credit, with your consent and as further described in this policy.

We retain information only as long as reasonably necessary for business, accounting, tax or legal purposes and then securely delete it.

We allow select third parties to collect information about your activity on our websites using cookies and other web technologies. These third parties use information they collect to help us provide more relevant Trademore advertisements on other websites

and apps and may also use information for their own or others' advertising purposes. For information about how to opt out of the use of this information for advertising purposes, please visit the "Your Right to Opt Out of the Sale of Personal Information and Targeted Advertising" section below.

### **Your Right to Access or Correct Information**

You have the right to request access to certain personal information we collected about you. You can exercise your right to access by submitting a request through the Trademore privacy dashboard or by sending an email to [privacy@trademore.com](mailto:privacy@trademore.com). You can use this same process to request that we correct inaccurate personal information we have about you.

### **Your Right to Delete**

You have the right to request that Trademore delete personal information we have about you but all the information we collect today is subject to exemption under the laws. The personal information that Trademore collects and retains today is used to provide service to you and for related purposes as described in this Privacy Policy. We retain this information only as long as necessary to maintain our relationship with you, comply with laws, rules, regulations, investigative subpoena or summons by governmental authorities; defending against legal claims; providing and maintaining the products and services you use, performing a contract, preventing and responding to security and other significant incidents; and taking immediate steps to protect an interest that is essential for the life or physical safety of you or another natural person. The law also allows for short-term transient purposes such as displaying relevant information to you based on your activity during a single interaction and then securely delete it.

### **Use of Sensitive Personal Information**

The state law prohibits us from processing sensitive personal information without your consent except as specified in the law. Sensitive personal information includes: data revealing racial or ethnic origin, religious beliefs, mental or physical health condition or diagnosis, sex life, sexual orientation or citizenship or immigration status; processing genetic or biometric data for the purpose of uniquely identifying you; personal data collected from a known child; or precise geolocation data.

We do not knowingly collect sensitive personal information.

**Your right to tell us not to use personal information to create profiles about you that we use to inform decisions that have legal or similarly significant effects.**

We do not use personal information to profile you to further decisions that have legal or similar significant effects.

### **Your Right to Opt Out of the Sale of Personal Information and Targeted Advertising**

The laws provide consumers the right to opt out of the sale of personal information and the right to opt out of processing of personal information for targeted advertising. Generally the laws define “sale” to mean the exchange of personal data for monetary or other valuable consideration. “Targeted advertising” means using personal data obtained or inferred from your activities over time and across nonaffiliated Internet web sites or online applications to predict your preferences or interests and display advertising to you.

Our activity that falls under the definition of “sale” or “targeted advertising” under these laws includes using third-party advertising companies’ cookies, pixels, tags, and other web technologies on our site to collect information about your activity on our site during your visit which can be used and combined with other information about you from your activity and behavior across unaffiliated websites and apps to personalize the ads you see.

We do not knowingly sell or share personal information related to children under 16 years of age.

To opt out of the sale of personal information and targeted advertising, please visit our [Your Privacy Choices](#) page, which is also accessible in the footer of our webpage. We also recognize when you exercise your choice to opt out using a browser-based Global Privacy Control (GPC).

### **Appeal**

Some states allow you to appeal a denial of your request to exercise the privacy rights provided by its state law. If you are a resident of Colorado, Connecticut, Oregon, Texas, or Virginia and we deny your request, you may submit an appeal of that decision by emailing us at [privacy@trademore.com](mailto:privacy@trademore.com). Please use the subject line "APPEAL" and provide your name, contact information including phone number, a description of the decision you are appealing, and the reason for your appeal.

### **We Do Not Discriminate Against You**

We do not discriminate against you if you exercise any rights described in this section. We do not deny goods or services, charge different prices or rates for goods or services, or provide you a different level or quality of goods and services.

## **Where to Exercise Your Rights**

You can exercise your right to access or correct data by submitting a request through the Trademore privacy dashboard or by sending an email to [privacy@trademore.com](mailto:privacy@trademore.com). You may submit a request to delete personal information and your right to appeal by emailing us at [privacy@trademore.com](mailto:privacy@trademore.com).

To opt out of the sale of personal information and targeted advertising, please visit our [Your Privacy Choices](#) page.

We require you to verify your identity using the processes described in the Trademore privacy dashboard before we fulfill your request.

You can authorize an agent to exercise your privacy rights on your behalf. To designate an agent, we first must verify your identity. Simply log-in to the Trademore privacy dashboard with your credentials, or with your order number and email address, and follow the instructions for exercising your privacy rights. There you will receive instructions on how to assign an authorized agent for your account.

## **Questions**

If you have questions about your rights under these laws, please email us at [privacy@trademore.com](mailto:privacy@trademore.com).

## **Additional Information for Oregon Residents**

TradeMore Services LLC is registered as active with the Oregon Secretary of State. Oregon law additionally provides residents with the right to request a list of the third parties with whom TradeMore may share consumer personal information. TradeMore may disclose the personal information of Oregon consumers to the following third parties: Alibaba, Facebook, Google, Microsoft, Skai, and Ziff Davis.

## **NEVADA**

Nevada law allows consumers to opt out of the sale of personal information by online service providers such as website operators. Nevada law defines “sale” as the exchange of certain personally identifiable information for money, where the recipient also intends to sell that information. Personally identifiable information includes name, address, phone number, Social Security number, or any identifier that can be used to contact a consumer electronically.

Trademore does not sell personal information as defined by Nevada law and has no plans to start selling personal information as defined by Nevada law. If Trademore begins selling such information, existing customers will be opted out.

If you have questions, please email us at [privacy@trademore.com](mailto:privacy@trademore.com).

## **VII. INTERNATIONAL USERS**

The site and services are designed for and targeted to U.S. audiences and are governed by and operated in accordance with the laws of the U.S. We make no representation that the site or services are operated in accordance with the laws or regulations of any other nations. By using the site and services and providing us with information, you understand and agree that your information may be transferred to and stored on servers located outside your resident jurisdiction and, to the extent you are a resident of a country other than the United States, that you consent to the transfer of such data to the United States for processing by us in accordance with this Privacy Policy.

## **VIII. CHANGES TO THE PRIVACY POLICY**

We may make changes to this privacy policy, so please check back periodically. You will be able to see that we made changes by checking the effective date above. If we decide to use or disclose information that identifies you personally in a way that is materially different from what we stated in our privacy policy at the time we collected that information from you, we will give you a choice about the new use or disclosure by appropriate means, which may include an opportunity to opt-out.

## **IX. STILL HAVE QUESTIONS?**

If you have any questions about this Privacy Policy or our practices, please contact us via email at [privacy@Trademore.com](mailto:privacy@Trademore.com).