PRIVACY STATEMENT

Introduction

This document refers to personal data, which is defined as information concerning any living person (a natural person who hereafter will be called the Data Subject) that is not already in the public domain.

The General Data Protection Regulation (GDPR) seeks to protect and enhance the rights of data subjects. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data. It should be noted that GDPR does not apply to information already in the public domain. Special Auction Services is committed to the protection of your data under GDPR and is pleased to provide the following Privacy Policy:

Who are we?

Company name: Specialist Auctions Ltd T/A Special Auction Services
Registered company No: 0589 5815
Registered Address: Bath House, 6-8 Bath Street, Redcliffe, Bristol, BS1 6HL

Personal Data

Most of the personal data we process about you comes directly from you (whether face to face, over the telephone, in paper form or by email).

Some personal data may be collected about you from details of your visits to our website,
including but not limited to personally identifying information like Internet Protocol (IP)
addresses. SAS may also collect statistics about the behaviour of visitors to its website.

SAS’s website uses cookies, which are strings of information that a website stores on a visitor’s computer, and that the visitor’s browser provides to the website each time the visitor returns.

SAS will only collect the information needed so that it can provide you with marketing and
Consulting services. This company does not sell or broker your data to third parties.

Legal basis for processing any personal data

SAS uses the information collected from you to meet its contractual obligations to clients;
compliance with legal and public obligations and for legitimate interests.

Examples are:

* Provide you with requested services (performance of contract)
* To evidence our compliance with legal requirements
* To keep you, our staff and property on our premises secure (legitimate interest)
* To provide you with marketing information (legitimate interest)
* To create and maintain records to assist with authenticity, provenance and the prevention of
fraud (public and legitimate interest)
* To monitor the performance of our website and make your experience better (legitimate
interest)
* To monitor your use of our services, train our staff and improve your client or user
experience (legitimate interest)

Legitimate interests pursued by SAS

To promote the marketing and consulting services offered by SAS and/or to market the
Services and/or products offered by SAS and its existing clients. Where data is held for legitimate interests SAS will assess those interests against the rights of individual data subjects.

Consent

Through agreeing to this privacy policy you are consenting to SAS processing your personal data for the purposes of its legitimate business and as outlined. You can withdraw consent at any time by emailing mail@specialauctionservices.com or writing to us, see last section for full contact details.

Disclosure

SAS may on occasions pass your Personal Information to third parties exclusively to fulfil its contractual or other obligations and for processing and delivery of marketing. SAS requires these parties to agree to process this information based on its instructions and requirements consistent with this Privacy Policy and GDPR.

SAS confirms that it will only collect the information needed so that it can provide you with marketing and consulting services. This company does not sell or broker your data.

Retention Policy

SAS will retain your personal data for as long as is necessary to provide the relevant services, maintain business records to satisfy tax, legal and other regulatory requirements, and protect and defend against potential legal claims.

Records on ownership of art objects may be used to assist with checks on authenticity, provenance and title and we will keep this data for as long as the record is relevant to our legitimate business interest and the public interest.

Data storage and security

Data is held in the United Kingdom using different (multiple) servers. SAS does not store
personal data outside the EEA. SAS takes all reasonable and appropriate steps to protect the security and integrity of all personal information provided via our website, or by any other means electronic or otherwise. However, it cannot guarantee the complete security of personal data held in its systems, nor that that information you supply through the internet or any computer network is entirely safe from unauthorised intrusion, access or manipulation during transmission. Any transmission is at your own
risk. We will not be liable for any resulting misuse of your personal data

Your rights as a data subject

At any point whilst SAS is in possession of or processing your personal data, all data subjects have the following rights:

* **Right of access** – you have the right to request a copy of the information that we hold about you.
* **Right of rectification** – you have a right to correct data that we hold about you that is inaccurate or incomplete.
* **Right to be forgotten** – in certain circumstances you can ask for the data we hold
about you to be erased from our records.
* **Right to restriction of processing** – where certain conditions apply you have a right to restrict the processing.
* **Right of portability** – you have the right to have the data we hold about you
transferred to another organisation.
* **Right to object** – you have the right to object to certain types of processing such as
direct marketing.
* **Right to object to automated processing, including profiling** – you also have the right not to be subject to the legal effects of automated processing or profiling.

In the event that SAS refuses your request under rights of access, we will provide you with a reason as to why, which you have the right to legally challenge.

You can request the following information:

* Contact details of the data privacy manager, where applicable.
* The purpose of the processing.
* How long the data will be stored.
* Details of your rights to correct, erase, restrict or object to such processing.
* Information about your right to withdraw consent at any time.
* How to lodge a complaint with the supervisory authority (Data Protection Regulator).

To access what personal data is held, identification will be required SAS will attempt to reply as soon as possible and in any case will do so within one month of receipt of the formal request.

No administration fee will be charged for considering and/or complying with such a request unless the request is deemed to be unnecessary or excessive in nature.

Requests should include the full name, date of birth and address of the person seeking access to their information.

To comply with GDPR, information relating to the individual must only be disclosed to them or someone with their written consent to receive it.

Before processing a request, the requestor’s identity must be verified.

Examples of suitable documentation include:

* Valid passport
* Valid identity Card
* Valid Driving Licence
* Birth Certificate

In addition to the above some other proof of address will be needed e.g. a named utility bill (no longer than 3 months old).

If SAS is dissatisfied with the quality, further information may be sought before personal data can be released.

All requests should be made to the Data Privacy Manager:

* mail@specialauctionservices.com
* in writing to the Data Privacy Manger at the address below

Complaints

In the event that you wish to make a complaint about how your personal data is being
processed by SAS or its partners, you have the right to complain to SAS’s Directors. If you do not get a response within 30 days you can complain to the Data Protection Regulator (ICO).

The details for each of these contacts are:

**Special Auction Services, Nexus Park, off Hambridge Road, Newbury, RG14 5RL**
**Data Protection Regulator** - Information Commissioners Office (ICO)
Details available on their website.

This policy is effective from 25th July 2023