GunBroker.com Privacy Policy

Effective May 09, 2022 (see previous version and summary of changes)

General

This GunBroker.com Privacy Policy (this "**Privacy Policy**") describes the practices of Outdoors Online, LLC dba GunBroker.com ("**GunBroker.com**" or "**we/us**") with respect to the collection, use and sharing of your personally identifiable information on the www.gunbroker.com website (together with any other websites on which this Privacy Policy is posted, including www.gungenius.com, collectively, the "**Site**"). Capitalized terms used in this Privacy Policy not otherwise defined in this Privacy Policy shall have the meanings given in the GunBroker.com User Agreement (the "**User Agreement**"), into which this Privacy Policy is incorporated. As used in this Privacy Policy, the following terms have the following meanings:

"Aggregated Data" means aggregated data derived from User Information and transaction information from the Site, which data cannot reasonably be used to identify any User of the Site or other individual.

"**Applicable Law**" shall have the meaning given in the User Agreement, but for residents of the State of California, shall include the CCPA.

"**CCPA**" means the California Consumer Privacy Act of 2018 and related regulations, as may be amended.

"**Device**" means the computer, mobile phone, tablet or other device used by you to visit the Site.

"**Identity Verification Information**" is defined in Section I(1)(a) below.

"**Interest Categories**" means the User's areas of interest, if any, indicated to GunBroker.com as part of checkbox surveys of Users at the time of registration or later.

"**Personal information**" means information that may be used to identify a specific individual, or that is about an identifiable individual, including but not limited to name, email address, phone number or credit card number.

"**Registration Information**" is defined in Section I(1)(a) below.

"**Site Activity Information**" is defined in Section I(1)(d) below.

"**Transaction Information**" is defined in Section I(1)(b) below.

"**User Information**" means Registration Information, Transaction Information, Financial Information (if User is a Seller), and Site Activity Information (including Interest Categories) for a User.

1. **Information We Collect on the Site and How We Use It**

You can visit the Site and learn about the services we provide without providing Personal Information. You do need to provide Personal Information, however, to sell, bid on or purchase Items, and to participate in our User forums and other interactive portions of the Site. Certain non-personally identifiable information, such as IP address, is collected automatically from every Site visitor, even if not voluntarily provided, as discussed further below.

We collect and use Personal Information in the specific ways listed below, and generally to improve our Site and services to you, as well as to meet our legal obligations. We also use Personal Information you provide for other purposes consistent with the reason you provide such information to us.

1. **User Information.** Below we describe the various components of your User Information and specific uses for each type of User Information. In addition to the uses described below, GunBroker.com uses your User Information in the following ways:

- To send you transaction-related notifications about transactions you carry out on the Site;
- If and when you bid on, make offers on or purchase an Item, to share your name, address, telephone number, email address and bid information with the Seller to facilitate the transaction;
- If and when you list an Item for sale, to share your contact information, including name, address, email address, telephone number and Item detail with bidders to facilitate the transaction;
- To perform our billing, administration and collections functions (and to contact you when necessary about these functions);
- To report information about your account, including late payments, missed payments or other delinquencies or defaults on your accounts, to credit reporting bureaus;
- To better understand your interests and for other marketing-related initiatives;
- To communicate with you and carry out actions requested by you (such as subscriptions to newsletters), including promotional messages (some of which may be related to your transactions on the Site or Interest Categories), as described in Section I(5) below;
- To resolve disputes involving you;
- To share information with law enforcement or other governmental agencies or authorized third parties when required by Applicable Law pursuant to a criminal investigation;
- To share information with third parties as part of investigations of fraud or alleged illegal activity or any other activity that may expose you, us or another User of the Site to legal liability;
- To customize your experience with our company and our Site (for example, adapting the Site to your browser) and to help us develop new products and services; and
- For other required or permissible purposes under Applicable Law.

1. ***Registration Information and Identity Verification Information***.

The Site's registration process requires Users to provide us valid and accurate contact Personal Information including name, street address, mobile phone number, birth date and email address

(collectively, "**Registration Information**"). We use this information for fraud prevention at the time of registration.

We may verify your name and address provided at the time of registration through third-party identity verification service providers we use to assist us. This is done as an identity verification and fraud prevention measure. All information described in this Section is referred to as "**Identity Verification Information**."

Credit Header Verification. One type of identity verification service is called "credit header" information. You may be required to answer a multiple-choice questionnaire compiled from information managed by consumer and business information sources. These questions can include elements from your financial history. We do not collect or store any Personal Information from the "credit header" process. All we receive is an indication of how many questions you answered successfully.

Pre-Fill Identity Verification Option. Another type of identity verification service we have uses your mobile phone "**Subscriber Data**"(as defined under Applicable Law) from your mobile carrier (AT&T, Sprint, T-Mobile, US Cellular, Verizon, or any other branded wireless carrier) to verify your identity. Your mobile phone Subscriber Data may include, without limitation, name, date of birth, postal address, billing zip code, telephone numbers, electronic mail addresses, last four digits of your Social Security Number, credit card numbers, Customer Proprietary Network Information (CPNI), location information, handset and mobile device identifiers (International Mobile Subscriber Identity (IMSI) and International Mobile Equipment Identity (IMEI)) and other status details, if available, account information and credit information.

Identity verification using your mobile phone Subscriber Data includes a Pre-Fill Form Option for us to use to expedite verifying your identity. The Pre-Fill Form includes information verified by our mobile phone identify verification service provider. The Pre-Fill Form Option requires you to answer a question by submitting your mobile phone billing zip code. It also requires you to provide us your express opt-in consent by clicking on the "OK" button on the consent page.

When you use this option, you authorize your wireless operator to disclose your mobile number, name, address, email, network status, customer type, customer role, billing type, mobile device identifiers (IMSI and IMEI) and other subscriber details, if available, to GunBroker.com and service providers for the duration of the business relationship, solely for identity verification and fraud avoidance.

Manual Identity Verification Option: Where you do not agree to the "Pre-Fill Form Option" above or where your identity cannot be verified using that option, GunBroker.com can carry out a manual process to verify your identity before allowing you to become a Seller or Buyer on the Site. This requires you to submit written evidence of your name and address, including such documents as may be requested by GunBroker.com such as a copy of your driver's license, utility bill or similar documentation as may be requested by GunBroker.com in its discretion.

1. ***Transaction Information*. We collect certain information submitted or generated during transactions on the Site based on your activities, including all sales and**

purchases of Items, as well as shipping information where shipment is facilitated on the Site, and other information you provide in connection with buying or shipping an Item (collectively, "Transaction Information"). We may also collect certain Personal Information that you provide through message board discussions, chats, correspondence or dispute resolution, which is also considered Transaction Information.

2. ***Financial Information*.** Before a User is permitted to Post Listings of Items on the Site, we collect financial information including bank account and/or credit card number, expiration date, card security code and billing address (collectively, "**Financial Information**"). A nominal charge of $2.00 is charged to the User's credit card before the User is permitted to Post Listings of Items, which charge is both to verify the validity of the credit card and to cover identity verification costs incurred by us. Financial Information is used to bill you for transactions you carry out on the Site and to collect on Fees incurred through the use of the Site.
3. ***Site Activity Information***. GunBroker.com strives to understand the interests of its Users and why they visit the Site and therefore collects the information described in this Section I(1)(d) ("**Site Activity Information**"). GunBroker collects Interest Categories through surveys of Users on the Site or through updates by Users to their preferences at the Preferences page in My GunBroker. Your indicated Interest Categories are reflected in your User Information. In addition, when you are logged into the Site, your IP address and other information provided by the computer or device you are using (described in Sections I(6) and I(7) below) may be associated with your User Information in our systems.
4. **Contests and Surveys**. If you decide to enter contests or surveys featured from time to time on the Site, you may be asked for Personal Information in addition to your User Information. This information is used in order to administer the contest or survey (for example, to contact the winner) or as otherwise disclosed on the Site at the time we collect the information.
5. **Information Requests**. We may ask you to provide Personal Information in order to allow us to respond to your requests for information or other requests made over the Site.

4.Social Media. We may collect your User name and other information you transmit to us over social media platforms such as Facebook® or Twitter® when you interact with GunBroker.com's specific page or social media account. We use the information you provide on social media to respond to your requests or questions, to improve our services, and for other purposes as disclosed at the time of the interaction.

5.Emails from GunBroker.com. Most email messages generated by the Site result directly from the User's actions (such as registration information, confirmation of placing a bid or an offer on an Item, confirmation of Listing an Item as a Seller, or the User's choice to subscribe to certain communications), or as necessary to inform you of changes to the Site or events related to the Site, or changes to the Site rules or policies. Other e-mail messages may result from marketing initiatives on the Site; however, Users may opt-out of receiving marketing messages; see the section below entitled "Communications from the Site and Your Choices."

Emails from our Site may contain web beacons or clear .gifs. These are small graphic images that can be used for recording when an email has been opened in order to track the performance of email marketing campaigns. We, our Affiliates and our third party service providers currently log responses from web beacons and/or clear .gifs, but this information is not stored or linked to your Personal Information in our systems.

6. **Other Information We Collect**. We automatically collect your IP address when you visit our Site. We use your IP address to help diagnose problems with our server, and to administer our Site. Your IP address is used to gather broad demographic information, and to track usage patterns in the Site. We also may collect geo-location information, device identification number and type, computer and connection information, statistics about page views and standard web log information. We do not correlate this information with data about individual Users (though our third-party analytics companies and/or advertisers may do so; see below under "Website Analytics" and "Banner Advertising" for your choices in this regard).
7. **Cookies**. First party cookies refer to cookies that are set by our Site. We are the only ones with access to this information. Third party cookies or requests allow other third parties to have access to the information collected. These cookies are usually used for analytics and advertising.
8. ***What are cookies and why do we use them?***

A cookie is a small text file containing alphanumeric characters that is downloaded and stored on your computer when you visit websites and uniquely identifies your browser. You do not need to provide us with any Personal Information if you simply want to browse through our Site. Like many other websites, we may record information in first party cookies that your web browser routinely shares, such as your browser type, browser language, software and hardware attributes, the date and time of your visit, the website from which you came, the geographical location of the Internet Protocol address and the pages on this site that you visit. This will generally be data that we collect in order to compile Aggregated Data. We do not normally associate this data with the Personal Information that you provide to us, but we may do so to investigate apparent fraud or a threat to the Site, our business or our Users.

We use third party cookies to collect information about how Users use our Site.

1. **Types of Cookies Employed on Our Site**
2. **Strictly Necessary Cookies**. Strictly necessary cookies make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies. We use **Google Tag Manager**on our Site to manage tags on our Site. It is not really a cookie, but it is essential to the functioning of the Site and cannot be opted out of. We use other cookies controlled by us to identify trusted web traffic and preserve your session across page requests.
3. **Performance Cookies**. Performance cookies help website owners to understand how visitors interact with their website by collecting and reporting information anonymously. We use **Google Analytics**and **Quantcast** for this purpose. We also use these cookies to provide us additional information about the Users to our Sites, such as their interests,

hobbies, and preferences, based upon information gathered by Google through the use of cookies and browser information. However, all information we gather via Google Analytics will be gathered on an anonymous, aggregate basis and will not associate this data with your Personal Information. We use this information to gain a better understanding of the visitors to our Site and to improve our Site and product offerings.

4. **Targeting (Advertising) Cookies**. Targeting (advertising) cookies are used to track visitors across websites, including the websites of third parties, for the purpose of displaying ads that are relevant and engaging for the individual User and thereby more valuable for website publishers and advertisers.
5. **Retargeting and Remarketing**. We may, using the techniques described above, and in conjunction with third party marketing services, gather information from your visit to our Site for purposes of providing relevant advertising content about our products and services to you in the future. This means that through third-party marketing services or third-party websites such as Google, we may display advertisements to you about our products and services, based on usage data collected during your visit to our Websites.
6. **Behavioral Advertising**. When trackers are used to monitor your traffic across websites in order to discern your interests for the purpose of showing you ads from companies other than the website owners, this is online behavioral advertising, or "OBA." We allow service providers to track you when you visit our Website for the purpose of understanding your interests, so that they can show you ads for other companies on other websites.
7. **Your Choices Regarding Cookies**

We employ OneTrust in order to provide you with choices over the types of cookies placed on your Device, as described below. However, if you use certain browser add-on ad blockers, you may not be presented with the OneTrust cookie banner with your choices. In this case, you may either disable the ad blocker add-on or follow the instructions below to block cookies through your browser settings.

Please note that you will need to take the actions outlined below for each Device and browser used by you in accessing the Site.

1. **OneTrust Cookie Banner**. The cookie banner on the Site allows you either to "Accept All Cookies" or "Customize Your Choices." You are not permitted to opt-out of GunBroker.com's strictly necessary cookies, but you can change the settings to block analytics and/or tracking/advertising cookies.
2. **Browser Opt-Out**

If you do not see the OneTrust cookie banner, you may need to disable ad-blocker browser add-ons you are using on your Device. You may alternatively manage your cookie settings from your browser. For example, you can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is set. If you disable cookies, however, it may interfere with the functionality of our Site and you may not be able to use all of the Site's features.

Details on how you can control and delete these cookies through your browser settings can be found through your browser's specific settings or options page:

- Google Chrome
- Mozilla Firefox
- Safari
- Opera
- Microsoft Internet Explorer
- Safari for iOS (iPhone and iPad)
- Chrome for Android
- Windows Phone

You can also use cookie management and disposal tools at your own prerogative such as downloading and installing certain browser plug-ins.

You can opt-out of Google Analytics by downloading and installing the browser plug-in from the following link: http://tools.google.com/dlpage/gaoptout.

To opt out of seeing personalized ads via the Google platform, please visit: https://support.google.com/ads/answer/2662922?hl=en. For more information regarding how Google uses cookies in advertising and how you can control advertising cookies, please visit: http://www.google.com/policies/technologies/ads/. To personalize the ads you see via the Google platform, visit http://www.google.com/settings/ads. For more information on how Google uses data when you visit its partners' websites or apps, visit http://www.google.com/policies/privacy/partners/.

1. ***Additional Information***

To learn more about the use of cookies generally or other technologies to deliver more relevant advertising, and to know your choices about not having this information used by certain service providers, please visit http://www.aboutads.info/choices.

8. **Mobile Devices.** In addition to the information described above, we and our third-party service providers may collect additional information when you utilize any of our mobile applications, including the type of mobile device you use, the temporary or persistent unique device identifiers (sometimes called UDID), the IP address of your mobile device, your mobile operating system, the type of mobile Internet browsers you use, and information about the way you use our mobile applications.

If you utilize any of the location-based services in our mobile applications, such as the functionality that allows you to search for a participating FFL in your area, we and our third-party service providers may collect, use, and share location data, including the real-time geographic location of your device. We use such information to provide and improve location-based products and services. You may opt-out from further allowing us to have access to your location data by adjusting the permissions in your mobile device.

1. **How We Share Your Information**
2. **Sharing with Affiliates**. We may share your Personal Information submitted at the Site among other members of our Affiliate group of companies, who may use that information

only to the extent consistent with the policies described in this Privacy Policy. For a list of Affiliated companies who may have access or use of your Personal Information, please contact us as described below under "Contact Us."

2. **Sharing with Non-Affiliated Third Parties**. Other than as described in the paragraph above or as specifically described elsewhere in this Privacy Policy, we will not share your Personal Information collected on the Site with third parties without your permission, except as necessary or appropriate to (i) carry out the transaction, activity or request made by you on the Site or otherwise, including with Payment Platforms on the Site; (ii) comply with any Applicable Law, or (iii) enforce or apply agreements with you; or (iv) to protect the rights, property or safety of us, our Affiliates or third parties, or as otherwise required or permitted by Applicable Law.
3. ***Sharing for Marketing Purposes***. We do not share your Personal Information with any third parties for such third parties' marketing purposes, unless you have opted into such sharing. If you have opted into such sharing, be aware that GunBroker.com is not responsible for the practices of any such third party with respect to your Personal Information after disclosure. Consult the privacy policies of any such third party in order to determine how to stop receiving messages from such third parties.
4. ***Third Party Websites and Advertisements***. This Privacy Policy only addresses the information that we collect from you, but not about how third parties to whom you disclose your information in your use of the Site may use and disclose it. If you disclose your Personal Information to third parties such as bidders, Buyers and Sellers on our Site, other rules may apply to how they use and disclose information provided to them. We do not police or influence the privacy practices of third parties. When providing your Personal Information to third parties, their privacy policies govern their use and disclosure of your Personal Information. Before disclosing your Personal Information to a third party, you should familiarize yourself with their privacy policy.
5. **Corporate Transactions**. In the event of a corporate transaction such as a sale, merger or reorganization or in the unlikely event of a bankruptcy or similar restructuring involving all or a portion of GunBroker.com or its parent and/or Affiliate company(ies) (including but not limited to a spinoff of an Affiliate, and subsequent acquisition of that Affiliate by a new third party), or a sale or transfer of assets, we reserve the right to disclose or transfer your Personal Information to non-Affiliate third party acquiring company(ies) and other third parties. In the event of such a sale or transfer, we will use reasonable efforts to direct the transferee(s) to use Personal Information you have provided through this Site in a manner that is consistent with this Privacy Policy.
6. **Aggregated Data**. We may collect, share and sell Aggregated Data, such as statistical information regarding our Users and their transactions on the Site, with third parties.
7. **Sharing with Our Service Providers**. We hire contractors to provide certain services on our behalf, including trend and statistical analysis, marketing campaigns, information processing and storage, and development of new products and services. As part of their services to us, these contractors may have access to some or all of the data that we maintain, including User Information, but they are always required to maintain the confidentiality of information they receive from us and are restricted from using the information for any purposes other than those authorized by us.

III. Communications From the Site and Your Choices

1. **Email Messages from Us**. The Site sends three types of email communications: (1) notifications related to activities such as purchases on the Site, (2) 'Saved Search' notifications, and (3) promotional email messages, which may include newsletters or other subscription-based communications, follow-on messages with respect to your activities on the Site, or other marketing from us about our products and services, or those of our Affiliates or trusted partners. Please see the descriptions below with respect to your choices for each.
2. **Transactional Messages**. Notifications related to activity on the Site are generated as a result or registering as a User of the Site, bidding on or purchasing Items, or listing Items for sale. These notifications can include bid confirmations, winning bidder notices, Item listing confirmations, Item sold notifications, monthly statements, billing messages, and other notifications related to activity on the Site. **You cannot opt out of receiving notifications related to transaction activity on the Site**; however, if you do not bid on or post Listings of Items and your account balance is zero you will not receive any such notifications from the Site.

If you are a registered Buyer or Seller on the Site, we may send you certain notices, such as notices of a substantial change in the policies and/or operation of the Site. **These notices are sent infrequently and cannot be opted out of other than by closing your account with us.**

1. **b. Saved Search**. Saved Search notifications are generated at your request to inform you when Items matching certain search criteria have been listed on the Site. There are removal instructions at the bottom of every such notification message. You can delete your saved searches to stop receiving the notifications by going to My GunBrokerthen clicking Saved Searches. Removal instructions appear on that page.
2. **Promotional Messages**.

GunBroker.com may send a variety of promotional messages, both from us and from our third party advertisers, but you are free to set your choices for either type of message, or opt-out if you have previously agreed to these, at any time. You can control which promotional emails you receive by logging into My GunBroker and visiting the Account/User Preferences page to update your choices with respect to promotional emails, both under "GunBroker Marketing Email Notifications" for emails from us, and under "Third Party Email Opt Out" for emails from our advertisers. You may also follow the instructions provided on the promotional message at issue.

Please note that if you provide your email address to one of our third party advertisers in response to an email from the third party, you will need to opt out of future marketing emails directly with that advertiser, and we are not responsible for the data privacy practices of any such third party with whom you have decided to interact directly. We recommend that you review the privacy policy of any such party before providing them with your Personal Information.

2. **Mobile Communications**. Your consent in the User Agreement to receive texts from us is completely voluntary. You may opt-out at any time. **To opt-out of text messages**, text STOP to any text message you receive or email opt-out-texts@gunbroker.comand specify

that you want to opt out of text messages. You may also text HELP for help. You acknowledge and agree to accept a final text message confirming your opt-out. It is your sole responsibility to notify us if you no longer want to receive text messages. You waive any rights to bring claims for unauthorized or undesired calls or text messages by failing to opt-out immediately or by failing to follow these instructions. Please allow up to thirty (30) days to process any opt-out request. Please note that if you opt out of text messages, we reserve the right to make non-automated calls to you.

3. **Children's Privacy**

The Site is not intended for or directed to persons less than 18 years of age. We do not knowingly solicit or collect Personal Information from or about children, and we do not knowingly market our services to children. If you are under 18 years of age, do not use the Site.

1. **For Persons Outside the United States**

By consenting to this Privacy Policy, you confirm that your command and knowledge of English is sufficient to understand the terms and conditions set forth herein. You agree that by using the Site, your Personal Information will be transferred to GunBroker.com servers located in the United States in connection with the purposes stated in this Privacy Policy. You understand that the laws with respect to the protection of Personal Information in the United States may not be as stringent as those in your home jurisdiction.

VII. Security

The Site has reasonable security measures in place to protect the loss, misuse and alteration of the Personal Information under our control. When you submit sensitive Personal Information via our Sites, such as Financial Information, that information is subject to secure sockets layer (SSL) encryption technology. However, no data transmission over the Internet can be guaranteed as 100% secure. As a result, while we strive to protect your Personal Information during transmission, we cannot ensure or warrant the security of any information you transmit to us or receive from us. We urge you to take steps to keep your Personal Information safe (including your account password and Financial Information), log out of your account after use, and close your web browser. If you do share your password or Personal Information with anyone, you are responsible for all actions taken using your User ID or account. If you lose control of your password, you may lose considerable control over your Personal Information and may be subject to legally binding actions taken on your behalf. Because of this, if the security of your password has been compromised in any way, you are responsible for immediately notifying us and for changing your password.

If you are registered User, you can review your Personal Information by logging into our Site, and you should act to update it promptly upon changes in your Personal Information or to correct any errors in it. You might not be able to alter or delete a public posting once you make it. At your request, we will close your account and make your Personal Information not publicly viewable as soon as reasonably possible, in accordance with Applicable Law.

VIII. Other Site-Related Items

1. **Public Forums**. The Site makes chat rooms, forums, message boards, and/or news groups available to its Users. Please remember that any information that is disclosed in these areas becomes public information and you should exercise caution when deciding to disclose your Personal Information. We strongly recommend that you do not post your email address or other Personal Information in our forums because this information is publicly available for anyone to see and unscrupulous third parties may use this information to form 'spam' lists or may otherwise misuse this information. We are not responsible for the use or misuse of information posted by you in public forums by other Users of the Site
2. **Other Sites**. The Site may contain links to the websites of third parties. We are not responsible for and have no liability for the privacy policies or practices of those websites. We recommend that you review the privacy policies of each website you visit.
3. **Submissions**.

Suggestions, materials or other intellectual property sent or transmitted to us via our Site are governed by the separate terms applicable to such materials identified at the time of submission (if any). All such Items shall be deemed to be non-confidential, and we shall have no obligation of any kind with respect to such Items and shall be free to use and distribute them to others without limitation, including, but not limited to developing and marketing products incorporating them.

1. **Acceptance of Privacy Policy**

By using our Site, you signify your acceptance of this Privacy Policy. If you do not agree with the terms of this Privacy Policy, please do not submit any Personal Information to us through our Site.

1. **Contact Us**

If you choose to visit the Site, your visit and any dispute over privacy are subject to this Privacy Policy and our User Agreement**,** including limitations on damages to the extent permitted by Applicable Law, resolution of dispute procedures, and application of the law of the State of Georgia, as set forth in our User Agreement.

You may review, update and modify your User Information by logging in and visiting My GunBroker / Account Info on the Site. You may also change your communications preferences by visiting My GunBroker / Account / User Preferences in order to unsubscribe from or opt in to certain email communications from the Site.

If you have any concern about the privacy practices of the Site, please contact us at following address with a detailed description, and we will try to resolve it.

Privacy Issues
GunBroker.com
PO Box 2511
Kennesaw, GA 30156

or

privacy@gunbroker.com

or

You can use our Support System at https://support.gunbroker.com/.

1. **Changes to Privacy Policy**

We reserve the right to modify this Privacy Policy at any time, but if we make changes to this Privacy Policy, we will post such revised policy on our Site and notify you by email or otherwise as required by Applicable Law**.** If you do not agree to the changes we have made, please do not use the Site. Your use of the Site after the effective date of any such change constitutes your acceptance of the applicable change.

XII. Supplemental Privacy Policy for California Residents

Effective Date: January 1, 2020

Last Reviewed on: November 19, 2020

This Supplemental Privacy Policy supplements the information in our Privacy Policy above and applies solely to California residents. It applies to Personal Information we collect on or through the Site and through other means (such as information collected offline, in person in our stores, and over the telephone). It does not apply to information we collect from job applicants or retain about our employees.

1.

1. **Summary of Information We Collect**

California law including the California Consumer Privacy Act ("CCPA") requires us to disclose information regarding the categories of Personal Information that we have collected about California consumers, the categories of sources from which the information was collected, the business or commercial purposes (as those terms are defined by Applicable Law) for which the information was collected, and the categories of parties with whom we share Personal Information.

1. **California Notice of Collection**

We or our service providers may collect the below categories of information for the following business or commercial purposes (as those terms are defined in applicable law):

- providing the Services made available on the Site (e.g., account servicing and maintenance, customer service, analytics, and communication about the Services);

- our or our service providers' operational purposes;
- auditing consumer interactions on our Site;
- detecting, protecting against, and prosecuting security incidents and fraudulent or illegal activity;
- bug detection and error reporting;
- customizing content that we or our service providers display on our Site;
- improving our existing Services and developing new services (e.g., by conducting research to develop new products or features);
- other uses that advance our commercial or economic interests, such as communicating with you about relevant products and services available to you from third party partners; or
- other uses about which we notify you.

Examples of these types of uses are identified below and discussed more generally above. We may also use the below categories of Personal Information for compliance with applicable laws and regulations, and we may combine the information we collect ("aggregate") or remove pieces of information ("de-identify") to limit or prevent identification of any particular User or device.

1. **Categories of Personal Information, Sources, and Third Parties we share it with**

The table below describes the collection, use, and sharing of Personal Information collected by us or our service providers within the last twelve (12) months. The first column lists the categories of Personal Information we or our service providers have collected. The second column lists the categories of sources of that information. The third column lists how that information is used. The fourth column lists the categories of third parties we share it with.

We reserve the right to modify this Privacy Policy at any time, but if we make changes to this Privacy Policy, we will post such revised policy on our Site and notify you by email or otherwise as required by Applicable Law**.** If you do not agree to the changes we have made, please do not use the Site. Your use of the Site after the effective date of any such change constitutes your acceptance of the applicable change.

XII. Supplemental Privacy Policy for California Residents

Effective Date: January 1, 2020

Last Reviewed on: May 15, 2020

This Supplemental Privacy Policy supplements the information in our Privacy Policy above and applies solely to California residents. It applies to Personal Information we collect on or through the Site and through other means (such as information collected offline, in person in our stores, and over the telephone). It does not apply to information we collect from job applicants or retain about our employees.

1. **Summary of Information We Collect**

California law including the CCPA requires us to disclose information regarding the categories of Personal Information that we have collected about California consumers, the categories of sources from which the information was collected, the business or commercial purposes (as those terms are defined by Applicable Law) for which the information was collected, and the categories of parties with whom we share Personal Information.

2. **California Notice of Collection**

We or our service providers may collect the below categories of information for the following business or commercial purposes (as those terms are defined in applicable law):

- providing the Services made available on the Site (e.g., account servicing and maintenance, customer service, analytics, and communication about the Services);
- our or our service providers' operational purposes;
- auditing consumer interactions on our Site;
- detecting, protecting against, and prosecuting security incidents and fraudulent or illegal activity;
- bug detection and error reporting;
- customizing content that we or our service providers display on our Site;
- improving our existing Services and developing new services (e.g., by conducting research to develop new products or features);
- other uses that advance our commercial or economic interests, such as communicating with you about relevant products and services available to you from third party partners; or
- other uses about which we notify you.

Examples of these types of uses are identified below and discussed more generally above. We may also use the below categories of Personal Information for compliance with applicable laws and regulations, and we may combine the information we collect ("aggregate") or remove pieces of information ("de-identify") to limit or prevent identification of any particular User or device.

3. **Categories of Personal Information, Sources, and Third Parties we share it with**

The table below describes the collection, use, and sharing of Personal Information collected by us or our service providers within the last twelve (12) months. The first column lists the categories of Personal Information we or our service providers have collected. The second column lists the categories of sources of that information. The third column lists how that information is used. The fourth column lists the categories of third parties we share it with.

Category of Personal Information Collected	**Categories of Sources**	**Examples of Uses**	**Categories of Third Parties We Share That Information With**
Identifiers, such as your real name, postal address, mobile device identifiers,	You, if you choose to provide to us.	Providing the Services, including registration and customer service.	Bidders, Buyers, and Sellers of the Items listed for sale on the Site.

Category of Personal Information Collected	Categories of Sources	Examples of Uses	Categories of Third Parties We Share That Information With
Internet Protocol (IP) address, email address	Automatically collected from you when you use the Site. Affiliates. Third parties (such as service providers who may refer you to the Sites).	Facilitating transactions and payments. Marketing and advertising our products and those of third parties. We need your IP address to serve pages of the Site to you. Security, fraud prevention, and legal compliance.	Affiliates. Service providers. Other individuals or companies at your request. Third parties, such analytics providers and advertisers. Third parties relating to legal requests, if required by law or if we believe in good faith that it is reasonably necessary. Third parties for sales of transfers of our business or assets
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)), such as name, shipping address, billing address, telephone number, bank account number, credit card number including expiration date and CCV code on back of card, date of birth, and last 4 digits of your SSN. *Some Personal Information included in*	You, if you choose to provide it to us. The law requires that we obtain certain information from you before you can buy and sell on our Site. Service providers, at your request.	Providing the Services, including registration and customer service. Facilitating transactions and payments. Security, fraud prevention, and legal compliance.	Bidders, Buyers, and Sellers of the Items listed for sale on the Site. Affiliates. Service providers. Other individuals or companies at your request. Third parties for sales of transfers of our business or assets.

Category of Personal Information Collected *this category may overlap with other categories*.	**Categories of Sources**	**Examples of Uses**	**Categories of Third Parties We Share That Information With**
Protected classifications characteristics under California or federal law, such as if your age is over 40.	Your age can be inferred from your birthday.	Security, fraud prevention, and legal compliance. (We need to confirm that you are 18 or older.)	Third parties relating to legal requests, if required by law or if we believe in good faith that it is reasonably necessary. Third parties for sales of transfers of our business or assets.
		Providing the Services, including registration and customer service.	Affiliates. Service providers.
Commercial information, such as products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	You, when you browse and use our Site to bid, buy, and sell listed Items Third parties (such as service providers who have a cookie on your browser).	Facilitating transactions and payments. Marketing and advertising our products and those of third parties. Analyzing and improving the Services. Security, fraud prevention, and legal compliance.	Other individuals or companies at your request. Third parties, such as third-party advertisers and analytics providers. Third parties relating to legal requests, if required by law or if we believe in good faith that it is reasonably necessary. Third parties for sales of transfers of our business or assets.
Financial data, such as credit card number,	You, if you choose to provide to us.	Facilitating transactions and payments.	Affiliates.

Category of Personal Information Collected	Categories of Sources	Examples of Uses	Categories of Third Parties We Share That Information With
verification number, and expiration date.			
	Third parties (such as service providers and third parties confirming payments made on your behalf).	Security, fraud prevention, and legal compliance	Service providers. Other individuals or companies at your request. Service providers, such as payment processors. Third parties relating to legal requests, if required by law.
Device information and identifiers, such as IP address; browser type; operating system; platform type	You, through your device, by accessing our Site.	We need your IP address to serve pages of the Site to you.	Service providers.
	We and our service providers collect this info automatically.	Optimizing your experience on the Site.	Affiliates.
Internet network and electronic activity device information, such as information about files you download, domain names, landing pages, browsing activity, content or ads viewed and clicked, dates and times of access, pages viewed, forms you complete or partially complete, search terms, uploads or downloads, the URL that referred you to our Site, the websites you visit after our Site; other web usage activity and data logged by our web	Your, through your device, by using our Site.	Providing the Services, including registration and customer service.	Service providers. Affiliates. Third party advertisers.
	Analytics providers. Advertising providers.	Marketing and advertising our products.	Third parties relating to legal requests, if required by law or if we believe in good faith that it is reasonably necessary.
	Marketers.	Marketing and advertising third party products.	Third parties for sales of transfers of our business or assets.

Category of Personal Information Collected	Categories of Sources	Examples of Uses	Categories of Third Parties We Share That Information With
servers, whether you open an email and your interaction with email content, access times, error logs, and other similar information.			
See Section I(7) "Cookies" in our Privacy Policy for more information.			Service providers.
Geolocation data, such as your postal address and your IP address. We infer your general location from your IP address.	You, if you choose to provide to us. Your use of our Site. Third parties (such as service providers).	Providing the Services, including registration and customer service	Affiliates. Third parties relating to legal requests, if required by law or if we believe in good faith that it is reasonably necessary. Third parties for sales of transfers of our business or assets.
Research, survey, or sweepstakes information (including personal identifiers and User generated content) collected if you participate in a survey or sweepstakes; includes information needed for you to participate (such as contact information), and to fulfill your prize.	You, if you choose to provide to us. Survey or sweepstakes partners. Researchers and analysts.	To administer the survey or sweepstakes. To understand our customers and their experiences with our products and services.	Affiliates. Service providers. Third parties relating to legal requests, if required by law or if we believe in good faith that it is reasonably necessary. Third parties for sales of transfers of our business or assets.

4. **Exercising your Rights as a California Consumer**

If you are a California resident, you have certain rights under the CCPA, subject to permitted exceptions under that law and its regulations. Effective as of January 1, 2020, you may request that we:

- Provide you a copy of certain information we hold about you; the categories of Personal Information we have collected or disclosed about you in the last twelve months; the categories of sources of such information; the business or commercial purpose for collecting or selling your Personal Information; the categories of third parties with whom we shared Personal Information.
- Delete certain information we have about you.
- Do not sell your Personal Information, as such term is used in the CCPA (described below under Section 5).

To exercise any of the above rights, please contact us submit the required verifying information online using our Data Subject Access Form. See below for a fuller explanation of the process for each type of exercise of rights

Verification Process and Required Information. Note that we may need to request additional information from you to verify your identity or understand the scope of your request. Registered Users will be required to log into their accounts to submit these requests, although non-registered Users you will not be required to create an account with us to submit a request or have it fulfilled.

Authorized Agent. You may designate an authorized agent to make a CCPA request on your behalf. We will require proof of your consent to designating such an agent and verification of your identity as described above.

Deletion Requests. Upon receipt of a request to delete the Personal Information of a California resident using the Data Subject Access Form, we may require you to log into your account and close the account. Where your account is not fully paid or you have active transactions or other matters pending, deletion of Personal Information is subject to the exceptions provided under CCPA with respect to those matters and may be subject to an extension of the time to act upon your request as permitted under CCPA and notified to you. Upon your confirmation that you have closed your account, we will send you a message that we have acted upon your request to delete your Personal Information by deleting and/or anonymizing your data within our systems. Note, however, that we retain a copy of your deletion request in our compliance files for audit purposes, and that this file may contain your name, address and email address. We also reserve the right to retain your Personal Information in accordance with other exceptions to deletion permitted under the CCPA (for example, retention of user zipcode and transaction history for tax compliance) or permissible delays in deletion under the CCPA (for example, deletion in backup media for our systems).

5. **Do Not Sell My Personal Information**

You may opt out of the "sale" of your Personal Information using the Data Subject Access Form. Under the CCPA, "sale" is defined such that it may include allowing third parties to receive certain information, such as browsing behavior, to deliver targeted advertising on the Websites or other websites, as well as other uses of your Personal Information for the benefit of third parties, such as including your email address in messages from us by our third party advertisers. We explain how this works above in Section I(7) "Cookies" and Section III(1)(c) "Promotional Messages." Unless you exercise your rights to opt out of these uses (either by using the Data Subject Access Form or otherwise as explained in this Privacy Policy), we "sell" certain of your information to third parties to provide you with offers and promotions and opportunities that may be of interest to you.

We may provide the following categories of Personal Information to third parties for these purposes:

- For online targeted advertising purposes: demographic and statistical information, User-generated content, device information and identifiers, browser and usage data, geolocation, and social media information.

- For sharing with third parties to send you relevant offers, products, promotions and opportunities: contact and registration information, demographic and statistical information, employment and education data, User-generated content, device information and identifiers, and geolocation.

If you would like to opt out of our use of your information for such purposes that are considered a "sale" under California law, you may opt out of advertising cookies, as explained above in Section I(7) above.

Minors' Right to Opt In. We do not sell the Personal Information of minors under 16 years of age.

If you would like further information regarding your legal rights under California law or would like to exercise any of them, please email us at privacy@gunbroker.com.

You may have the right to receive information about the financial incentives that we offer to you (if any). You also have the right to not be discriminated against (as provided for in applicable law) for exercising certain of your rights. Certain information may be exempt from such requests under applicable law. We need certain types of information so that we can provide our products and services to you. If you ask us to delete it, you may no longer be able to access or use our Websites or purchase our products without providing the information again.

6. **California Shine the Light**

California law permits Users who are California residents to request and obtain from us once a year, free of charge, a list of the third parties to whom we have disclosed their 'Personal Information' (if any, and as defined under applicable California law) for their direct marketing purposes in the prior calendar year, as well as the type of Personal Information disclosed to those

parties. If you are a California resident and would like to request this information, please submit your request in an email at privacy@gunbroker.com.

7. **California *Do Not Track*Notice**

At this time, there is no worldwide uniform or consistent industry standard or definition for responding to, processing, or communicating "Do Not Track" signals. Thus, the Site is unable to respond to "Do Not Track" signals. Please refer to the instructions in your browser in order to determine the appropriate settings in order to signal your preferences in this regard, but be aware that all of the functionality of the Site may not be available to you if your settings block tracking cookies placed by us or by third parties.

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