

# Privacy Policy

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Effective April 7, 2026

Concierge Auctions, LLC, a Delaware limited liability company, (“Concierge Auctions”) also d/b/a Instant Gavel (“Instant Gavel”, together with Concierge Auctions “we” or “us”) provides this Privacy Policy to inform you of our policies and procedures regarding the collection, use and disclosure of personal information we receive from users of [www.conciergeauctions.com](http://www.conciergeauctions.com) and [www.instantgavel.com](http://www.instantgavel.com) (each a “Site”). This Privacy Policy applies only to information that you provide to us or that we obtain through the Site, an auction or the Member or bidder registration process. This Privacy Policy may be updated from time to time. We will notify you of any material changes by posting the new Privacy Policy on the Site. You are advised to consult this policy regularly for any changes. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Concierge Auctions Terms of Service, accessible at [www.conciergeauctions.com](http://www.conciergeauctions.com).

As used in this policy, the terms “using” and “processing” information include using cookies on a computer, subjecting the information to statistical or other analysis and using or handling information in any way, including, but not limited to collecting, storing, evaluating, modifying, deleting, using, combining, disclosing and transferring information within our organization or among our affiliates within the United States or internationally.

## **INFORMATION COLLECTION AND USE**

Our primary goals in collecting information are to provide and improve our Site, services, features and content, to administer your use of the Site (together, the “Service”) and to enable users like you to enjoy and easily navigate the Site.

## **PERSONALLY IDENTIFIABLE INFORMATION**

When you (i) contact us via the online form on the Site, (ii) choose to opt in to receive Concierge Auctions newsletters, (iii) choose to submit information about your property for a complimentary evaluation by Concierge Auctions, (iv) choose to be added to our database of real estate agents, we will ask you for personally identifiable information. This refers to information about you that can be used to contact or identify you (“Personal Information”).

We will also collect Personal Information from you if you choose to register with us through the Site to become a Member in order to access our bidding platform and related documentation or if, after becoming a Member, you choose to participate in any auction or place a bid on a property featured on the Site.

Personal Information includes, but is not limited to, your name, date of birth, phone number, address, driver's license, passport, photo ID, social security or tax ID number and other identifying documents, credit card or other billing or banking information, limited financial information (letters of credit if you plan to bid at an auction, payment information in connection with your purchases, wire instructions, digital wallet details and related information), email address, website URL and home and business postal addresses. We use your Personal Information (in some cases, in conjunction with your Non-Identifying Information) mainly to provide the Service, to administer your inquiries and to facilitate your transactions.

We also collect the other information that you provide as part of registration or otherwise as part of your use of the Site (e.g., without limitation, zip code (on its own), estimated property value and individual preferences) ("Non-Identifying Information").

Certain Non-Identifying Information would be considered a part of your Personal Information if it were combined with other identifiers (for example, combining your zip code with your street address) in a way that enables you to be identified. But the same pieces of information are considered Non-Identifying Information when they are taken alone or combined only with other non-identifying information (for example, your viewing preferences). We may combine your Personal Information with Non-Identifying Information and aggregate it with information collected from other Concierge Auctions Users (defined below) to attempt to provide you with a better experience, to improve the quality and value of the Service and to analyze and understand how our Site and Service are used. We may also use the combined information without aggregating it to serve you specifically, for instance to deliver a product to you according to your preferences or restrictions.

If you opt in to receive Concierge Auctions newsletters, we will use your Personal Information to contact you with such Concierge Auctions newsletters, marketing or promotional materials and other information that may be of interest to you. If you decide at any time that you no longer wish to receive such communications from us, please follow the unsubscribe instructions provided in any of the communications or opt out via the "Account Settings" section of the Site. (See "Changing or Deleting Information" below.)

## **LOG DATA**

When you visit the Site, whether as a Concierge Auctions Member or a non-registered user just browsing (any of these, a "Concierge Auctions User"), our servers automatically record information that your browser sends whenever you visit a website ("Log Data"). This Log Data may include information such as your computer's Internet Protocol ("IP") address, browser type or the webpage you were visiting before you came to our Site, pages of our Site that you visit, the time spent on those pages, information you search for on our Site, access times and dates, and other statistics. We use this information to monitor and analyze use of the Site and the Service and for the Site's technical administration, to increase our Site's functionality and user-friendliness, and to better tailor our Site to our visitors' needs. We also use this information to verify that visitors to the Site meet the criteria required to process their requests.

## **GENERAL DATA PROTECTION REGULATION**

The European Union General Data Protection Regulation (GDPR) began enforcement of the regulation on May 25, 2018. Concierge Auctions continues to update its policies and practices to ensure compliance with the GDPR standards and regulations. We strive to keep your personal data private and secure.

## **COOKIES**

Like many websites, we use “cookies” to collect information. A cookie is a small data file that we transfer to your computer’s hard disk for record-keeping purposes. We use cookies for two purposes. First, we utilize persistent cookies to save your login information for future logins to the Site. Second, we utilize session ID cookies to enable certain features of the Site, to better understand how you interact with the Site and to monitor aggregate usage by Concierge Auctions Users and web traffic routing on the Site. Unlike persistent cookies, session cookies are deleted from your computer when you log off from the Site and Service and then close your browser. You can instruct your browser, by changing its options, to stop accepting cookies or to prompt you before accepting a cookie from the websites you visit. If you do not accept cookies, however, you may not be able to use all portions of the Site or all functionality of the Service.

## **PHISHING**

Identity theft and the practice currently known as “phishing” are of great concern to Concierge Auctions. Safeguarding information to help protect you from identity theft is a top priority. We do not and will not, at any time, request your credit card information, login information, or national identification numbers in a non-secure or unsolicited e-mail or telephone communication. For more information about phishing, visit the Federal Trade Commission’s website.

## **EMAILS AND OTHER COMMUNICATIONS**

By becoming a Member, you are requesting that we inform you agree to receive communications from us, including promotional emails. If you would like to alter the frequency and type of communications you receive from us, you may do so at any time by updating the communication preferences specified in your email settings, or by going to our website, and opening your account page. If you no longer wish to receive promotional communications from us, you may do so by changing your preferences as noted above. Please note that this may affect your ability to access certain products and services, and we may continue to send non-promotional communications such as information you request about a property or bidding registration information. If you refer others to us using our email functionality, please note that they may choose not to receive any promotional emails from us in the future by following the opt-out instructions in the email invitation. If you want to receive our emails, but do not wish for us to track the emails we send you, some email services allow you to adjust your display to turn off HTML or disable download of images that should effectively disable our email tracking.

## **RESUBSCRIBE TO EMAILS**

To manage your email subscription settings, click the manage subscription link at the bottom of any email you have received from Concierge Auctions. If you believe you have opted out of communication and would like to resubscribe, please fill in your email in the form below and click the link that appears to resubscribe.

## **INFORMATION SHARING AND DISCLOSURE**

We may disclose your Personal Information and Non-Identifying Information to: (1) business affiliates, partners, and/or third-party vendors that work on our behalf to provide the Services; (2) transaction coordinators or facilitators; and/or (3) identity checking and verification, Know Your Customer (KYC), Anti-Money Laundering (AML), and risk screening services, among others. (See an example here of a third-party vendor who of a third-party vendor who may check your data against various public data sets.) In addition, some of these screening services may aggregate your data (such as cryptocurrency hashes and output addresses which are available publicly and user IDs) with their datasets to identify illicit activity. (See an example here of a third-party vendor who may provide such screening services.)

## **DISCUSSION FORMS AND BLOG**

If you choose to post a comment on the discussion forms featured on our Site or on our blog, accessible at [www.ConciergeAuctions.com/blog/](http://www.ConciergeAuctions.com/blog/) (the "Blog"), the content of your comments, along with your name, email address and website URL (if applicable) will be publicly viewable via the Site and Blog.

## **AUCTIONS**

If you choose to register to participate in an auction and/or to bid on a property featured on the Site as part of an auction, we will share your username with the owner of the property and any other Concierge Auctions Users who are watchers of the applicable auction. If you win an auction for a property featured on the Site, we will share your Personal Information with the owner of the property and any closing agent or other professionals (like escrow, title and real estate agents) involved in the transaction in order to facilitate the transaction.

## **AGGREGATE INFORMATION AND NON-IDENTIFYING INFORMATION**

We may share aggregated information that does not include Personal Information and we may otherwise disclose Non-Identifying Information and Log Data with third parties for industry analysis, demographic profiling and other purposes. Any aggregated information shared in these contexts will not contain your Personal Information.

## **SERVICE PROVIDERS**

We may employ third party companies and individuals to facilitate our Service, to provide the Service on our behalf, to perform Site-related services (e.g., without limitation, maintenance services, database management, web analytics and improvement of the Site's features) or to assist us in analyzing how our Site and Service are used. These third parties have access to

your Personal Information only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

## **COMPLIANCE WITH LAWS AND LAW ENFORCEMENT**

Concierge Auctions cooperates with government and law enforcement officials and private parties to enforce and comply with the law. We will disclose any information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims and legal process (including, but not limited to, subpoenas), to protect the property and rights of Concierge Auctions or a third party, to protect the safety of the public or any person, or to prevent or stop activity we may consider to be, or to pose a risk of being, illegal, unethical or legally actionable activity.

## **BUSINESS TRANSFERS**

Concierge Auctions may sell, transfer or otherwise share some or all of its assets, including your Personal Information, in connection with a merger, acquisition, reorganization or sale of assets or in the event of bankruptcy.

## **CHANGING OR DELETING YOUR INFORMATION**

All Members may review, update, correct or delete the Personal Information in their registration accounts by contacting us or via the “Account Settings” section of the Site. If you completely delete all such information, then your account may become deactivated. If you would like us to delete your account in our system, please contact us at [info@conciergeauctions.com](mailto:info@conciergeauctions.com) with a request that we delete your Personal Information from our database. We will use commercially reasonable efforts to honor your request. We may retain an archived copy of your records as required by law or for legitimate business purposes.

## **SECURITY**

Concierge Auctions is very concerned with safeguarding your information. We employ certain physical, technological, and administrative security measures and attempt to ensure they are applicable under the circumstances. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, while we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security.

We will make any legally required disclosures of any breach of the security, confidentiality, or integrity of your unencrypted electronically stored “personal data” (as defined in applicable state statutes on security breach notification) to you via email or conspicuous posting on this Sites in the most expedient time possible and without unreasonable delay, insofar as consistent with (i) the legitimate needs of law enforcement or (ii) any measures necessary to determine the scope of the breach and restore the reasonable integrity of the data system.

## **INTERNATIONAL TRANSFER**

Your information may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the privacy laws may not be as protective as those in your jurisdiction. If you are located outside the United States and choose to provide information to us, Concierge Auctions transfers Personal Information to the United States and processes it there. Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

## **LINKS TO OTHER WEBSITES**

Our Site contains links to other websites. If you choose click on a third party link, you will be directed to that third party's website. The fact that we link to a website is not an endorsement, authorization or representation of our affiliation with that third party, nor is it an endorsement of their privacy or information security policies or practices. We do not exercise control over third party websites. These other websites may place their own cookies or other files on your computer, collect data or solicit personal information from you. Other websites follow different rules regarding the use or disclosure of the personal information you submit to them. We encourage you to read the privacy policies or statements of the other websites you visit.

## **OUR POLICY TOWARD CHILDREN**

The Site is not directed to persons under 18. We do not knowingly collect personally identifiable information from children under 13. If a parent or guardian becomes aware that his or her child has provided us with Personal Information without their consent, he or she should contact us at [info@conciergeauctions.com](mailto:info@conciergeauctions.com). If we become aware that a child under 13 has provided us with Personal Information, we will delete such information from our files.

## **CONTACTING US**

If you have any questions about this Privacy Policy, please contact us at [notices@conciergeauctions.com](mailto:notices@conciergeauctions.com) or at: 228 Park Avenue S, Suite 70835, New York, NY 10003

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