

Privacy Policy

Effective October 5, 2026

THE SHORT VERSION

- We collect what you enter in our waitlist and founding seller forms, a few details sent with each submission (such as the link that brought you to the site), and standard server logs.
- We use this information to run the waitlist, send launch news and review seller applications. We do not sell it or use it for targeted advertising.
- The website uses no advertising or tracking cookies. Our analytics provider, Plausible, works without cookies and shows us only aggregate numbers.
- Wherever you live in the US, you can ask us to access, correct or delete your information by emailing privacy@lotandgavel.com.
- The marketplace is not open yet. We will revise this policy before it opens in March 2027.

I. Who we are

Lot & Gavel, Inc. is a Delaware corporation (“Lot & Gavel,” “we,” “us” or “our”). We are building a US marketplace for authenticated pre-owned luxury goods, including handbags, watches, fine jewelry, ready-to-wear, accessories and objects.

The marketplace is not open yet. Today, lotandgavel.com is a marketing website where you can join our waitlist or apply to become a founding seller. You cannot create an account or buy or sell anything on the website. We plan to open to customers in the United States in March 2027.

Our mailing address is Lot & Gavel, Inc., 99 Hudson Street, 5th Floor, New York, NY 10013. For privacy questions and requests, email privacy@lotandgavel.com.

2. Scope of this policy

This Privacy Policy explains how we collect, use, disclose and protect personal information through lotandgavel.com (the “website”) and through the emails we send to people who sign up on it.

“Personal information” means information that identifies, relates to or could reasonably be linked to you. It does not include aggregated or de-identified information that cannot reasonably be linked to you.

The website is intended for people in the United States who are 18 or older. This policy does not cover other websites or services, including the social media sites we link to. Their own privacy policies apply when you visit them.

This policy covers our practices before launch only. When the marketplace opens, we will handle additional information to run accounts and orders, and we will publish a revised policy before that happens. Your use of the website is also governed by our Terms of Use. If you apply to sell with us, please also read our Founding Seller Terms.

3. Information we collect

Notice at collection. This section, together with Section 4 (how we use information), Section 5 (how we share it) and Section 7 (how long we keep it), is our notice at collection. We do not sell personal information or share it for cross-context behavioral advertising.

Information you give us

We collect personal information from you only when you choose to submit one of our forms or write to us. You can browse the website without giving us any information.

Waitlist. The waitlist form appears in two places on our home page. It asks for:

- your email address;
- whether you are interested in buying or selling; and
- if you are interested in selling, whether you sell as an individual or as a small dealer or boutique.

Founding seller application. The application form on our Sell with us page asks for:

- your full name and email address;
- your seller type (for example, an individual or a small dealer or boutique);
- your city and state;
- the categories of items you sell;
- roughly how many pieces you expect to sell in the next six months;
- your website or Instagram handle, if you choose to give it; and
- any note you choose to add.

Please do not include sensitive information in the note, such as government identification numbers, financial account details or health information. We do not need it.

Emails you send us. If you write to us, we receive your email address and whatever your message contains, and we use them to reply.

Information sent automatically with a form

When you submit either form, the website also sends us:

- which form you used;

- the address (URL) of the page you submitted it from;
- the date and time of the submission;
- campaign tags, if you reached the website through a tagged link (the `utm_source`, `utm_medium`, `utm_campaign`, `utm_content`, `utm_term` and `ref` parameters, which usually identify the post, newsletter or partner that linked to us); and
- the referring web address, meaning the page you were on before you came to the website, if your browser provides it.

The website holds the campaign tags and referring address in your browser's session storage (which is not a cookie) until you close the tab, and sends them to us only if you submit a form. Our Cookie Notice explains how this works.

Information collected when you visit

Server logs. Our hosting provider automatically records standard server log information each time a page or file is requested: your IP address, your browser's user agent (which describes your browser and operating system), the page or file requested, and the time of the request. We use these logs only for security and troubleshooting, and they are kept for up to 30 days.

Analytics. We use Plausible Analytics, provided by Plausible Insights OÜ, a company based in the European Union. Plausible does not set cookies and does not store IP addresses. It gives us aggregated information about visits: page views, referring websites, browser, operating system, device type, and country or region. To count unique visitors without cookies, Plausible creates a hash from your IP address and user agent that rotates daily and is discarded every 24 hours, so a visit cannot be linked to the same visitor on a later day. We also count form sign-ups in Plausible, noting which form was used and whether the person chose buying or selling. Your name and email address are not sent to Plausible. Plausible processes this data in the European Union, and the reports we see are aggregate statistics that do not identify you.

Fonts. Our pages use fonts from Google Fonts. To display them, your browser requests the font files directly from Google's servers, so Google receives your IP address and browser information as part of that request. Google Fonts does not set cookies. Google describes how it handles this information in its privacy policy.

Categories of personal information we collect

This table summarizes the information above using the categories that state privacy laws use.

CATEGORY	EXAMPLES	SOURCE	PURPOSE	DISCLOSED TO
Identifiers	Full name, email address, and your website or Instagram handle if you give one	You, through our forms or by email	Running the waitlist; sending launch news and early-access invitations; reviewing seller applications and contacting applicants; responding to you	Formspree (form processing); our email service provider

CATEGORY	EXAMPLES	SOURCE	PURPOSE	DISCLOSED TO
Commercial information	Whether you are interested in buying or selling; your seller type; the categories you sell; how many pieces you expect to sell in the next six months	You, through our forms	Running the waitlist and sending relevant updates; reviewing seller applications	Formspree; our email service provider
General location	City and state (seller application only). We do not collect precise geolocation.	You, through the seller application	Reviewing seller applications	Formspree
Internet or other electronic network activity	With a form submission: the form used, page address, time of submission, campaign tags and referring web address. With any visit: IP address, browser user agent, page requested and time (server logs)	Your browser, automatically	Understanding which channels bring people to the website; keeping the website secure; troubleshooting	Formspree (submission details); our hosting provider (server logs); Plausible (to produce aggregate statistics, without storing IP addresses); Google (when your browser loads fonts)
Other information you choose to give us	The optional note on the seller application; the contents of emails you send us	You	Reviewing seller applications; responding to you	Formspree (application notes)
Sensitive personal information	None. We do not ask for it, and we ask you not to send it.	Not applicable	Not applicable	Not applicable

Any of these categories may also be disclosed to our professional advisers, to authorities where the law requires it, or to a successor business, as described in Section 5. We do not sell any category of personal information or share it for cross-context behavioral advertising, and we have not done so in the past 12 months.

4. How we use information

We use personal information to:

- maintain the waitlist and send you updates relevant to buying or selling;
- send you launch news and invitations to early access;
- review founding seller applications, contact applicants about their applications, and begin onboarding approved sellers;
- understand which channels bring people to the website, using campaign tags, referring addresses and aggregate analytics;

- respond to your messages and to privacy requests;
- keep the website secure, prevent misuse such as spam submissions, and fix technical problems; and
- comply with our legal obligations and respond to lawful requests from authorities.

We look at campaign and referral information in aggregate, for example to see how many sign-ups came from a particular newsletter. We do not use it to build profiles of individuals. We do not use personal information for profiling that produces legal or similarly significant effects for you.

If we want to use personal information for a purpose that is materially different from those listed here, we will tell you first and, where the law requires, ask for your consent.

Emails from us

If you join the waitlist or apply as a founding seller, we will email you about the launch and early access and, if you applied, about your application. Every marketing email we send includes an unsubscribe link and our postal address, as the federal CAN-SPAM Act requires. You can unsubscribe at any time using that link or by emailing privacy@lotandgavel.com. If you have applied as a seller, we may still contact you about your application after you unsubscribe from marketing emails.

5. How we share information

We disclose personal information only in the following ways.

Service providers. We use a small number of service providers to run the website and its forms. They are bound by contract to protect the personal information they handle for us and to use it only to provide their services to us. They are:

- Formspree, Inc., which receives and processes form submissions;
- our email service provider, which sends our emails;
- our hosting provider, which serves the website and keeps server logs; and
- Plausible Insights OÜ, which provides our cookieless analytics.

Professional advisers. We may disclose information to our lawyers, accountants and other professional advisers where they need it to advise us. They are bound by duties of confidentiality.

Legal requirements. We may disclose information to law enforcement, regulators, courts or other parties where the law requires it, for example in response to a valid subpoena, court order or other legal process.

Business transfers. If Lot & Gavel is involved in a merger, acquisition or sale of all or part of its assets, personal information may be transferred to the buyer or successor. We will notify you of the transfer, for example by email or by a notice on the website.

We do not sell personal information. We do not share it for cross-context behavioral advertising or use it for targeted advertising. We do not disclose personal information to third parties for their own direct marketing purposes.

Where information is processed

We are based in the United States. Our service providers may process information in the United States or in other countries where they operate. Plausible processes analytics data in the European Union.

6. Cookies and similar technologies

We do not use advertising or tracking cookies, tracking pixels or social media plugins, so the website has no cookie banner. The social media links in our footer are ordinary links. We use your browser's session storage to hold campaign tags and the referring address until you close the tab. Plausible works without cookies, and Google Fonts does not set cookies. Our Cookie Notice gives the details.

Global Privacy Control. If your browser sends a Global Privacy Control (GPC) signal, we treat it as a request to opt out of the sale and sharing of your personal information and of targeted advertising. We do none of these things, so honoring the signal does not change how the website works for you.

Do Not Track. We do not track visitors over time across other websites, so the website does not change its behavior in response to Do Not Track signals.

7. How long we keep information

We keep personal information only as long as we need it for the purposes described in this policy:

- **Waitlist details** are kept until you unsubscribe or ask us to delete them. If we close the waitlist without launching the marketplace, we will delete waitlist details within 90 days of closing it.
- **Seller applications we do not approve** are deleted 12 months after our decision.
- **Seller applications we approve** become part of our seller onboarding records, which are governed by the Seller Agreement.
- **Submission details and campaign tags** are kept with the submission they were sent with and deleted with it.
- **Server logs** are kept for up to 30 days.
- **Analytics data** is kept by Plausible only as aggregate statistics. The daily hash used to count unique visitors is discarded every 24 hours.
- **Emails you send us** are kept as long as we need them to deal with your message and, for privacy requests, to keep a record of how we handled the request.

If you unsubscribe or ask us to delete your information, we may keep your email address on a suppression list for the sole purpose of making sure we do not email you again. We may also keep information for longer where the law requires it.

8. Your privacy rights

Several US states, including California, Colorado, Connecticut, Virginia, Texas and Oregon, give their residents rights over their personal information. Depending on where you live, these may include the right to:

- **Know and access:** confirm whether we process your personal information and obtain the specific pieces we hold, the categories we collect, the sources, the purposes, and the categories of recipients;
- **Correct:** ask us to correct inaccurate personal information;
- **Delete:** ask us to delete personal information we collected from or about you;
- **Portability:** receive a copy of your personal information in a portable, readily usable format;
- **Opt out:** opt out of the sale of personal information, sharing for cross-context behavioral advertising, targeted advertising, and profiling that produces legal or similarly significant effects. We do none of these things, but you may still submit an opt-out request and we will record it; and
- **Appeal:** appeal our decision on a request.

We extend these rights to everyone who uses the website, whatever state you live in.

We will not discriminate against you for exercising any of these rights. If you ask us to delete your information, we will also remove you from the waitlist, because we need your email address to send you updates.

Some rights are subject to exceptions under the law, for example where we must keep information to meet a legal obligation. If we deny a request in whole or in part, we will tell you why.

California “Shine the Light”

California Civil Code Section 1798.83 allows California residents to ask for information about our disclosures of personal information to third parties for their own direct marketing purposes. We do not make such disclosures.

9. How to make a request

Submitting a request. Email privacy@lotandgavel.com, preferably from the email address you used with us, and tell us which right you want to exercise.

Verification. We verify requests by confirming that you control the email address associated with your information, usually by replying to that address and asking you to confirm the request. We will not ask for more information than we need, and we will use the information you give us for verification only for that purpose.

Timing. We will respond within 45 days of receiving your request. If we need more time, we may extend that period by up to 45 more days. If we do, we will tell you within the first 45 days and explain why.

Authorized agents. You may ask an authorized agent to make a request for you. The agent must give us written permission signed by you. We may also ask you to confirm directly with us that you gave the agent permission.

Appeals. If we decline your request in whole or in part, you can appeal by replying to our decision email with the word “Appeal.” We will review the decision and tell you in writing what we decided and why, within the time your state’s law requires. If we deny your appeal, you may contact the Attorney General of your state.

10. Children

The website is intended for adults and is not directed to anyone under 18. We do not knowingly collect personal information from children under 13, and we do not knowingly collect, sell or share personal information of anyone under 16. Please do not use our forms if you are under 18.

If we learn that we have collected personal information from a child under 13 or a person under 16, we will delete it. If you are a parent or guardian and believe your child has given us information, contact us at privacy@lotandgavel.com.

11. Security

We protect personal information with measures suited to the limited information we hold:

- all traffic to and from the website is encrypted using HTTPS;
- access to personal information is limited to Lot & Gavel staff who need it for their work; and
- our service providers are bound by contract to protect the information they handle for us.

No method of transmitting or storing information is completely secure, so we cannot guarantee the security of your information. If you believe your information has been compromised, contact us at privacy@lotandgavel.com. Where the law requires, we will notify you of a security incident that affects your personal information.

12. Changes to this policy

This policy is effective October 5, 2026. We will revise it before the marketplace opens to cover accounts, orders and the other information the marketplace will need. We may also update it at other times.

When we update the policy, we will post the new version on this page with a new effective date. If we make material changes, we will also email the people on our waitlist.

13. Contact us

For questions about this policy or requests about your personal information, contact us at:

- Email: privacy@lotandgavel.com
- Mail: Lot & Gavel, Inc., 99 Hudson Street, 5th Floor, New York, NY 10013

For other legal matters, email legal@lotandgavel.com. For general questions, email hello@lotandgavel.com.