

PRIVACY & GDPR POLICY

Version 2.1 | 21 October 2026

1. Who we are

Ashford Farm BV, Vosheuvelstraat 46, 3950 Bocholt, Belgium, enterprise/VAT number BE 0832.872.682 ("Ashford Farm", "we", "us" or "our") is responsible for the processing of personal data described in this policy.

This policy applies to Ashford Farm BV and the activities and services it operates, including Ashford Farm, Ashford Breeding and Ashford Auctions. Ashford Auctions is operated under Ashford Farm BV and is not treated as a separate controller for the purposes described in this policy.

2. Personal data we may process

Depending on how you interact with us, we may process:

- Identification and contact details, such as name, address, telephone number, email address, date of birth and, where relevant, identity or verification information.
- Business and invoicing details, including company name, VAT number, billing address, transaction and payment-related information.
- Website and technical information, including IP address, browser/device information, logs, website activity and information collected through cookies or similar technologies.
- Communications and information you provide to us, including enquiries, forms, documents and correspondence.
- Job-application information, including CVs, motivation letters and related recruitment information.
- Security information, including CCTV/video footage where applicable.
- For Ashford Auctions: bidder registration and account information, bidder verification information, bidding history, bid amounts and timestamps, allocation and purchase information, acceptance of auction terms, invoice and payment information, collection/transport information and communications relating to an auction or Lot.

3. Why we process personal data and our legal bases

We process personal data only where we have an appropriate legal basis. Depending on the processing, this may include:

- Contract and pre-contractual steps: to provide requested services, administer registrations, organise and conduct auctions, record bids and allocations, conclude and perform purchase agreements, arrange invoicing and related administration.
- Legal obligations: including accounting, tax, regulatory and other obligations imposed by applicable law.
- Legitimate interests: including ordinary business administration, responding to enquiries, maintaining and securing our websites and systems, preventing fraud or misuse, establishing or defending legal claims and organising our activities, provided those interests are not overridden by your rights and interests.
- Consent: where required, including for non-essential cookies and certain direct marketing communications. You may withdraw consent at any time without affecting processing carried out before withdrawal.

4. Ashford Auctions and WeAuction

Ashford Auctions uses a separate online bidding environment hosted and technically operated by WeAuction B.V. ("WeAuction"). Ashford Farm BV remains responsible for the organisation of Ashford Auctions and is the controller for bidder and auction data processed on its behalf.

To operate the auction, we may provide WeAuction with registration, account, bidder, bid and related technical information. Where WeAuction processes this information on our behalf, it acts as our data processor and processes the data under our instructions and the applicable data-processing arrangements. WeAuction may also process limited

information for its own legally defined purposes where it acts as an independent controller; where applicable, information about such processing should be provided by WeAuction on the bidding environment.

The Ashford Auctions informational website and the WeAuction-hosted bidding environment are separate technical environments. Our Cookie Policy applies to the Ashford Auctions website. Cookies and similar technologies used on the WeAuction environment are addressed by the cookie information and preference controls presented there.

5. Recipients and service providers

Access to personal data is limited to persons who need it for the relevant purpose. This may include Ashford Farm management, employees, administrators and professional advisers. We may also share personal data with processors and service providers that support our activities, such as website and hosting providers, auction technology providers (including WeAuction), IT and security providers, payment and banking providers, accounting and invoicing providers, communications providers and professional advisers.

We may also disclose personal data where required by law, to competent authorities, or where reasonably necessary to establish, exercise or defend legal claims. We do not disclose personal data to third parties for their own marketing merely because you participate in an Ashford Auction.

6. International transfers

We aim to use service providers that process personal data within the European Economic Area (EEA). If personal data is transferred outside the EEA, we will use an appropriate transfer mechanism and safeguards required by applicable data-protection law, where necessary. The use of a website or service provider outside Belgium does not by itself mean that personal data is transferred outside the EEA.

7. Retention

We retain personal data only for as long as necessary for the purpose for which it was collected and to meet applicable legal, accounting, tax, contractual and dispute-resolution requirements. Retention therefore differs by category rather than following one general 12-month period.

- Auction, contractual, transaction, invoice and accounting records may be retained for the applicable statutory retention periods and, where appropriate, for the period during which legal claims may be brought or defended.
- General enquiries and business correspondence are retained for as long as reasonably necessary for follow-up and administration.
- Cookie and website data are retained in accordance with the applicable Cookie Policy and the settings of the relevant tools.
- Marketing contact details are retained for as long as you remain subscribed or until you withdraw your consent. We may retain limited information thereafter where necessary to record and respect your opt-out.
- Job-application data is normally deleted within four weeks after the relevant recruitment procedure closes, unless a longer period is required or you have consented to longer retention for future opportunities.

We may retain properly anonymised information for statistical or research purposes where it can no longer be linked to an identifiable individual.

8. Security

We use appropriate technical and organisational measures designed to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access. No internet transmission or storage system can be guaranteed to be completely secure.

9. Your rights

Subject to the conditions and limitations of the GDPR, you may have the right to request access to, correction or deletion of your personal data; restriction of processing; data portability; and to object to processing based on

legitimate interests. Where processing is based on consent, you may withdraw that consent at any time. You also have the right to lodge a complaint with the Belgian Data Protection Authority.

To exercise your rights or ask a privacy question, contact us at info@ashfordfarm.net. We may request information necessary to verify your identity before acting on a request.

10. Marketing

You may choose to receive news, auction announcements, collection updates and other marketing communications relating to Ashford Auctions. Where required by law, we send electronic marketing communications only with your consent.

You may provide your email address to receive Ashford Auctions marketing communications and may optionally provide your telephone number to receive updates through telephone-based messaging services, such as WhatsApp or SMS, where offered.

You can withdraw your consent at any time by using the unsubscribe method provided in the communication or by contacting us. Withdrawing consent does not affect the lawfulness of processing carried out before withdrawal.

Transactional and service communications relating to an enquiry, registration, contract, purchase or auction are not marketing communications and may still be sent where necessary.

11. Cookies

Cookies and similar technologies used on our websites are described in the applicable Cookie Policy and cookie preference centre. Non-essential cookies are activated only where the required consent has been obtained. The Ashford Auctions website has its own Cookie Policy. The separate WeAuction bidding environment provides its own cookie information and preference controls.

12. External links

Our websites may contain links to third-party websites. Once you leave an Ashford-operated website, the relevant third party may process personal data under its own privacy information. This does not alter Ashford Farm BV's responsibilities for personal data that we disclose to processors acting on our behalf.

13. Changes and contact details

We may update this policy when our activities, systems or legal obligations change. The current version and date will be made available on our website.

Ashford Farm BV
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3950 Bocholt, Belgium
Enterprise/VAT number: BE 0832.872.682
General privacy enquiries: info@ashfordfarm.net
Ashford Auctions enquiries: auctions@ashfordfarm.net

This policy should be read together with the applicable Cookie Policy and, for Ashford Auctions, the Ashford Auctions General Auction Terms & Conditions.