



California and Virginia Residents

See the State law privacy rights section below for important information about your personal information and rights under applicable state privacy laws.

This Privacy Policy describes how TCGplayer, Inc. (“**TCGplayer**,” “**we**,” “**us**” or “**our**”) processes personal information that we collect through our digital or online properties or services that link to this Privacy Policy (including as applicable, our website, platform, mobile application, social media pages, marketing activities, live events and other activities described in this Privacy Policy (collectively, the “**Service**”). TCGplayer may provide additional or supplemental privacy policies to individuals for specific products or services that we offer at the time we collect personal information.

Notice to European Users

Please see the [Notice to European Users](#) section for additional information for individuals located in the European Economic Area or United Kingdom (which we refer to as “**Europe**”, and “**European**” should be understood accordingly) below.

Index

Personal information we collect- - - - -	page 2
How we use your personal information - - - - -	page 4
How we share your personal information - - - - -	page 7
Your choices - - - - -	page 8
Other sites and services - - - - -	page 10
Security - - - - -	page 10
International data transfers - - - - -	page 10
Children - - - - -	page 10
Changes to this Privacy Policy- - - - -	page 10
How to contact us - - - - -	page 11
State privacy rights notice - - - - -	page 11
Notice to European users - - - - -	page 18



Personal information we collect

Information you provide to us. Personal information you, as a buyer or seller on our platform, may provide to us through the Service or otherwise includes:

- **Contact data**, such as your first and last name, salutation, email address, billing and mailing addresses, professional title and company name, and phone number.
- **Demographic data**, such as your city, state, country of residence, postal code, and age.
- **Profile data**, such as the username and password that you may set to establish an online account on the Service, date of birth, biographical details, photograph or picture, links to your profiles on social networks, interests, preferences, and any other information that you add to your account profile.
- **Communications data** based on our exchanges with you, including when you contact us through the Service, communicate with us via chat features, social media, or otherwise.
- **Marketing data**, such as your preferences for receiving our marketing communications and details about your engagement with them.
- **User-generated content data**, such as photos, images, music, videos, comments, questions, messages, works of authorship, and other content or information that you generate, transmit, or otherwise make available on the Service, as well as associated metadata. Metadata includes information on how, when, where and by whom a piece of content was collected and how that content has been formatted or edited. Metadata also includes information that users can add or can have added to their content, such as keywords, geographical or location information, and other similar data.
- **Government-issued identification number data**, such as national identification number (e.g., Social Security Number, tax identification number, passport number), state or local identification number (e.g., driver's license or state ID number), and an image of the relevant identification card.
- **Payment data** needed to complete transactions, including payment card information or bank account number. We use a third-party vendor to directly collect and process your payment data, as described further below.
- **Buyer transaction data**, such as information about orders buyers initiate through the Service, along with overall buying behavior (e.g., what buyers search, which items they add to cart, etc.).
- **Seller transaction data**, such as information about sales made through the Service, visitors to your virtual storefronts, inventory and pricing history, and complaints and escalations.
- **Seller store data**, such as store size, revenue, business ID and tax information.
- **Other data** not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.



Third-party sources. We may combine personal information we receive from you with personal information we obtain from other sources, such as:

- **Public sources**, such as government agencies, public records, social media platforms, and other publicly available sources.
- **Private sources**, such as data providers, social media platforms and data licensors.
- **Our affiliate partners**, such as our affiliate network provider and publishers, influencers, and promoters who participate in our paid affiliate programs.
- **Marketing partners**, such as joint marketing partners and event co-sponsors.
- **Third-party services**, such as social media services, that you use to log into, or otherwise link to, your Service account. This data may include your username, profile picture and other information associated with your account on that third-party service that is made available to us based on your account settings on that service.

Automatic data collection. We, our service providers, and our business partners may automatically log information about you, your computer or mobile device, and your interaction over time with the Service, our communications and other online services, such as:

- **Device data**, such as your computer or mobile device's operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), IP address, unique identifiers (including identifiers used for advertising purposes), language settings, mobile device carrier, radio/network information (e.g., Wi-Fi, LTE, 3G), and general location information such as city, state or geographic area.
- **Online activity data**, such as pages or screens you viewed, how long you spent on a page or screen, the website you visited before browsing to the Service, navigation paths between pages or screens, information about your activity on a page or screen, access times and duration of access, and whether you have opened our emails or clicked links within them.
- **Approximate Location data** when you authorize the Service to access your device's approximate geographic location.
- **Communication interaction data** such as your interactions with our email or other communications (e.g., whether you open and/or forward emails) – we may do this through use of pixel tags (which are also known as clear GIFs), which may be embedded invisibly in our emails.

Cookies. Some of our automatic data collection is facilitated by cookies and similar technologies. For more information, see our [Cookie Notice](#). We will also store a record of your preferences in respect of the use of these technologies in connection with the Service.



Cookies and similar technologies. Some of the automatic collection described above is facilitated by the following technologies:

- **Cookies**, which are small text files that websites store on user devices and that allow web servers to record users' web browsing activities and remember their submissions, preferences, and login status as they navigate a site. Cookies used on our sites include both "session cookies" that are deleted when a session ends, "persistent cookies" that remain longer, "first party" cookies that we place and "third party" cookies that our third-party business partners and service providers place.
- **Local storage technologies**, like HTML5, that provide cookie-equivalent functionality but can store larger amounts of data on your device outside of your browser in connection with specific applications.
- **Web beacons**, also known as pixel tags or clear GIFs, which are used to demonstrate that a webpage or email was accessed or opened, or that certain content was viewed or clicked.
- **Session-replay technologies**, such as those provided by Hotjar that employ software code to record users' interactions with the Services in a manner that allows us to watch DVR-like replays of those user sessions. The replays include users' clicks, mobile app touches, mouse movements, scrolls and keystrokes/key touches during those sessions. These replays help us diagnose usability problems and identify areas for improvement. You can learn more about Hotjar at <https://www.hotjar.com/legal/policies/privacy/> and you can opt-out to the creation of a user profile, Hotjar's storing of data about your usage of our Sites and Hotjar's use of tracking cookies on other websites at <https://www.hotjar.com/policies/do-not-track/>.
- **Chat technologies**, such as those provided by Ada, a third-party vendor, that employ cookies and software code to operate the chat features that you can use to communicate with us through the Service. We, Ada, and other third parties may access and use information about webpages visited on our website, your IP address, your general geographic information (e.g., city, state), and other personal information you share through online chats for the purposes described in this Privacy Policy.

Data about others. We may offer features that help users invite their friends or contacts to use the Service, and we may collect contact details about these invitees so we can deliver their invitations. Please do not refer someone to us or share their contact details with us unless you have their permission to do so.

How we use your personal information

We may use your personal information for the following purposes or as otherwise described at the time of collection:

Service delivery and operations. We may use your personal information to:

- provide and operate the Service and our business;
- personalize the Service, including remembering the devices from which you have previously logged in and remembering your selections and preferences as you navigate the Service;
- establish and maintain your user profile on the Service;



- support and process orders, risk and fraud screening, authentication and payments;
- facilitate your invitations to friends who you want to invite to join the Service;
- facilitate social features of the Service, such as by identifying and suggesting connections with other users of the Service and providing chat or messaging functionality;
- enable security features of the Service, such as by sending you security codes via email or SMS, and remembering devices from which you have previously logged in;
- communicate with you about the Service, including by sending Service-related announcements, updates, security alerts, and support and administrative messages;
- communicate with you about events or contests in which you participate;
- understand your needs and interests, and personalize your experience with the Service and our communications; and
- provide support for the Service, and respond to your requests, questions and feedback.

Research and development. We may use your personal information for research and development purposes, including to analyze and improve the Service and our business and to develop new products and services. As part of these activities, we may create aggregated, de-identified and/or anonymized data from **personal information we collect**. We make personal information into de-identified or anonymized data by removing information that makes the data personally identifiable to you. We may use this aggregated, de-identified or otherwise anonymized data and share it with third parties for our lawful business purposes, including to analyze and improve the Service and promote our business and will not attempt to reidentify any such data.

Marketing and advertising. We, our service providers and our third-party advertising partners may collect and use your personal information for marketing and advertising purposes:

- **Direct marketing.** We may send you emails, push messages, and other direct marketing communications and may personalize these messages based on your needs and interests. You may opt-out of our marketing communications as described in the **Opt-out of marketing** section below.
- **Interest-based advertising.** Our third-party advertising partners may use cookies and similar technologies to collect information about your interaction (including the data described in the automatic data collection section above) with the Service, our communications and other online services over time, and use that information to serve online ads that they think will interest you. This is called interest-based advertising. We may also share information about our users with these companies to facilitate interest-based advertising to those or similar users on other online platforms. You can learn more about your choices for limiting interest-based advertising in the **Your choices** section of our **Cookie Notice**.



Events, promotions and contests. We may use your personal information to:

- administer promotions and contests;
- communicate with you about promotions or contests in which you participate; and
- contact or market to you after collecting your personal information at an event.

Service improvement and analytics. We may use your personal information to analyze your usage of the Service, improve the Service, improve the rest of our business, help us understand user activity on the Service, including which pages are most and least visited and how visitors move around the Service, as well as user interactions with our emails, and to develop new products and services.

Compliance and protection. We may use your personal information to:

- comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas, investigations or requests from government authorities;
- protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
- audit our internal processes for compliance with legal and contractual requirements or our internal policies;
- enforce the terms and conditions that govern the Service; and
- prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

With your consent. In some cases, we may specifically ask for your consent to collect, use or share your personal information, such as when required by law.

Retention. We generally retain personal information to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements, to establish or defend legal claims, or for fraud prevention purposes, unless specifically authorized to be retained longer. To determine the appropriate retention period for personal information, we may consider factors such as the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

When we no longer require the personal information we have collected about you, we may either delete it, anonymize, aggregate or deidentify it, or isolate it from further processing.

How we share your personal information

We may share your personal information with the following parties and as otherwise described in this Privacy Policy, in other applicable notices, or at the time of collection.



Affiliates. Our corporate parent, subsidiaries, and affiliates.

Service providers. Third parties that provide services on our behalf or help us operate the Service or our business (such as hosting, information technology, online chat functionality providers, customer support, email delivery, marketing, consumer research and website analytics).

Sellers. Our business is, in part, to facilitate the purchase of collectibles from individual and business sellers through our marketplace. When a buyer purchases a product through our Service, the buyer is directing us to share the buyer's contact data with the relevant seller to enable the seller to complete the transaction that the buyer has requested.

Payment processors. Any payment card information you use to make a purchase on the Service is collected and processed directly by our payment processors, such as PayPal or Braintree. You may review the privacy policy(ies) for PayPal and Braintree, or the policies of other providers when you are directed to their sites, to learn how they use your payment information.

Advertising partners. Third-party advertising companies for the **interest-based advertising purposes** described above.

Business and marketing partners. Third parties with whom we co-sponsor events or promotions, with whom we jointly offer products or services, or whose products or services may be of interest to you.

Linked third-party services. If you log into the Service with, or otherwise link your Service account to, a social media or other third-party service, we may share your personal information with that third-party service. The third party's use of the shared information will be governed by its privacy policy and the settings associated with your account with the third-party service.

Professional advisors. Professional advisors, such as lawyers, auditors, bankers and insurers, where necessary in the course of the professional services that they render to us.

Authorities and others. Law enforcement, government authorities, and private parties, as we believe in good faith to be necessary or appropriate for the **Compliance and protection purposes** described above.

Business transferees. We may disclose personal information in the context of actual or prospective business transactions (e.g., investments in TCGplayer, financing of TCGplayer, public stock offerings, or the sale, transfer or merger of all or part of our business, assets or shares). For example, we may need to share certain personal information with prospective counterparties and their advisers. We may also disclose your personal information to an acquirer, successor, or assignee of TCGplayer as part of any merger, acquisition, sale of assets, or similar transaction, and/or in the event of an insolvency, bankruptcy, or receivership in which personal information is transferred to one or more third parties as one of our business assets.

Other users and the public. Your profile and other user-generated content data (except for messages) may be visible to other users of the Service and the public. For example, other users of the Service or the public may



have access to your information if you chose to make your profile or other personal information available to them through the Service, such as when you provide comments, reviews, survey responses, or share other content. This information can be seen, collected and used by others, including being cached, copied, screen captured or stored elsewhere by others (e.g., search engines), and we are not responsible for any such use of this information.

Your choices

In this section, we describe the rights and choices available to all users. Users who are located in California, Virginia, or Europe can find information about their additional rights below.

Access or update your information. If you have registered for an account with us through the Service, you may review and update certain account information by logging into the account.

Opt-out of communications. You may opt-out of marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email, or by [contacting us](#). Please note that if you choose to opt-out of marketing-related emails, you may continue to receive service-related and other non-marketing emails. You may opt-out of mobile push messages by disabling them in your mobile device's settings.

If you receive marketing text messages from us, you may opt out of receiving further text messages from us by replying STOP to our message.

Cookies. For information about cookies employed by the Service and how to control them, see our [Cookie Notice](#).

Blocking images/clear gifs: Most browsers and devices allow you to configure your device to prevent images from loading. To do this, follow the instructions in your particular browser or device settings.

Mobile location data. You can disable our access to your device's approximate geolocation in your mobile device settings.

Push notifications and device permissions. You may revoke any permissions you previously granted to us, such as permission to access your camera or camera roll, through the settings on your mobile device. You may opt out of push notifications by changing the settings on your mobile device.

Advertising choices. You may be able to limit use of your information for interest-based advertising through the following settings/options/tools:

- **Browser settings.** Changing your internet web browser settings to block third-party cookies.



- **Privacy browsers/plug-ins.** Using privacy browsers and/or ad-blocking browser plug-ins that let you block tracking technologies.
- **Platform settings.** Google and Facebook offer opt-out features that let you opt-out of use of your information for interest-based advertising. You may be able to exercise that option at the following websites:
 - Google: <https://adssettings.google.com/>
 - Facebook: <https://www.facebook.com/about/ads>
- **Ad industry tools.** Opting out of interest-based ads from companies that participate in the following industry opt-out programs:
 - Network Advertising Initiative: http://www.networkadvertising.org/managing/opt_out.asp
 - Digital Advertising Alliance: optout.aboutads.info.
 - AppChoices mobile app, available at <https://www.youradchoices.com/appchoices>, which will allow you to opt-out of interest-based ads in mobile apps served by participating members of the Digital Advertising Alliance.
- **Mobile settings.** Using your mobile device settings to limit use of the advertising ID associated with your mobile device for interest-based advertising purposes.

You will need to apply these opt-out settings on each device and browser from which you wish to limit the use of your information for interest-based advertising purposes.

We cannot offer any assurances as to whether the companies we work with participate in the opt-out programs described above.

Do Not Track. Some Internet browsers may be configured to send "Do Not Track" signals to the online services that you visit. We currently do not respond to "Do Not Track" signals. To find out more about "Do Not Track," please visit <http://www.allaboutdnt.com>.

Declining to provide information. We need to collect personal information to provide certain services. If you do not provide the information we identify as required or mandatory, we may not be able to provide those services.

Linked third-party platforms. If you choose to connect to the Service through your social media account or other third-party platform, you may be able to use your settings in your account with that platform to limit the information we receive from it. If you revoke our ability to access information from a third-party platform, that choice will not apply to information that we have already received from that third party.

Other sites and services

The Service may contain links to third party websites, mobile applications, and other online services operated



by third parties. In addition, our content may be integrated into web pages or other online services that are not associated with us. These links and integrations are not an endorsement of, or representation that we are affiliated with, any third party. We do not control websites, mobile applications or online services operated by third parties, and we are not responsible for their actions nor are they subject to this Privacy Policy. We encourage you to read the privacy policies of the other websites, mobile applications and online services you use.

Security

We employ technical, organizational and physical safeguards designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies and we cannot guarantee the security of your personal information.

International data transfer

We are headquartered in the United States and may use service providers that operate in other countries. Your personal information may be transferred to the United States or other locations where privacy laws may not be as protective as those in your state, province, or country.

Users in Europe should read the important information provided below about transfer of personal information outside of Europe.

Children

The Service is not intended for use by anyone under 13 years of age, or for users in Europe, the age of majority. If you are a parent or guardian of a child from whom you believe we have collected personal information in a manner prohibited by law, please [contact us](#). If we learn that we have collected personal information through the Service from a child without the consent of the child's parent or guardian as required by law, we will comply with applicable legal requirements to delete the information.

Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Service or other appropriate means. Any modifications to this Privacy Policy will be effective upon our posting the modified version (or as otherwise indicated at the time of posting). In all cases, your use of the Service after the effective date of any modified Privacy Policy indicates your acknowledging that the modified Privacy Policy applies to your interactions with the Service and our business.

How to contact us

To submit requests under applicable privacy laws or GDPR, please see the relevant sections below. For any other questions you have about this Privacy Policy, please contact our customer service team [here](#).



State privacy rights notice

Except as otherwise provided, this section applies to residents of California and Virginia, and other states with privacy laws applicable to us that grant their residents the rights described below, including the California Consumer Privacy Act (“**CCPA**”) and the Virginia Consumer Data Protection Act (“**VCDPA**”).

For purposes of this section, “personal information” has the meaning given to “personal data”, “personal information” or similar terms under the applicable privacy laws of the state in which you reside. Please note that not all rights listed below may be afforded to all users and that if you are not a resident of the relevant states, you may not be able to exercise these rights. In addition, we may not be able to process your request if you do not provide us with sufficient detail to allow us to confirm your identity or understand and respond to it.

In some cases, we may provide a different privacy notice to certain categories of residents of these states, such as job applicants, in which case that notice will apply with respect to the activities it describes instead of this section.

Your privacy rights. You may have some or all of the rights listed below. However, these rights are not absolute, and in certain cases we may decline your request as permitted by law.

- **Right to information/know.** You can request whether we have collected your personal information, and in certain cases, information about how we use and share it. For example, if you are a California resident, you can request information for the past 12 months about the categories of personal information that we have collected; the categories of sources from which we collected personal information; the business or commercial purpose for collecting, sharing and/or selling personal information; the categories of any personal information that we sold or disclosed for a business purpose; and the categories of any third parties with whom personal information was sold, shared or disclosed for a business purpose.
- **Right to access.** You can request a copy of the specific pieces of personal information that we have collected about you.
- **Right to correction.** You can ask us to correct inaccurate personal information that we have collected about you.
- **Right to deletion.** You can ask us to delete certain personal information that we have collected from you. Please note that once we process a deletion request, we will be unable to provide any online or digital services to you or support for past products or services that you may have purchased.
- **Right to opt-out.**
 - **Opt-out of the sharing of personal information (i.e., tracking for targeted advertising purposes).** You can opt-out of certain tracking activities for targeted advertising (also known as interest-based advertising) purposes.
 - **Opt-out of the sale of personal information.** You may ask us not to “sell” personal information we have collected about you to third parties now or in the future. The right to opt out of personal information sales is separate from our direct communications with you for marketing purposes.



- **Opt-in.** If we know that you are 13-15 years of age, we will ask for your affirmative authorization to sell your personal information or share your personal information for targeted advertising purposes before we do so.
- **Sensitive personal information.** You have the right to limit certain uses or disclosures of sensitive personal information; however, we do not use or disclose sensitive personal information for purposes that California residents have a right to limit under the CCPA.
- **Nondiscrimination.** You are entitled to exercise the rights described above free from discrimination as prohibited by applicable privacy laws.

Exercising your right to information/know, access, correction, and deletion.

Email us at: sales@tcgplayer.com.

We cannot process your request if you do not provide us with sufficient detail to allow us to understand and respond to it.

If you are a resident of Virginia, you can ask to appeal any denial of your request in the same manner through which you may submit a request.

Notice of right to opt-out of sales and sharing of personal information / Exercising your right to opt-out of tracking for targeted advertising purposes. While we do not sell personal information for money, we, like many companies, use services that help deliver interest-based ads to you as described above. Applicable privacy laws may classify our use of some of these services as “sharing” your personal information with the advertising partners that provide the services because they use personal information from our users (e.g., device information and technical usage information) to provide cross-context behavioral advertising. These advertising partners use this information for the purposes of serving ads that are more relevant, for ad campaign measurement and analytics, and for fraud detection and reporting and may sell that information to other businesses for advertising and other purposes. You have the right to direct us to not “share” personal information for cross-context behavioral advertising, and you can submit requests to opt-out of such advertising or other sales or sharing of personal information at [TCGplayer.com](https://www.tcgplayer.com) by selecting the “Do Not Sell or Share My Personal Information” link at the bottom of the page. Your request to opt-out will apply only to the browser and the device from which you submit the request. You can also broadcast the Global Privacy Control (GPC) to opt-out for each participating browser system that you use. Learn more at the [Global Privacy Control](https://www.globalprivacycontrol.org/) website.

Verification of Identity. We may need to verify your identity in order to process your information/know, access, correction, or deletion requests and reserve the right to confirm your residency. To verify your identity, we may require government identification, a declaration under penalty of perjury, authentication into your Service account, personal identifiers we can match against information we may have collected from you previously, confirmation of your request using the email or telephone account stated in the request, a declaration under penalty of perjury, or other information, where permitted by law.

Authorized Agents. Your authorized agent may be able to make a request on your behalf. However, we may need to verify your authorized agent’s identity and authority to act on your behalf. We may require a copy of a valid



Privacy Policy

Effective as of February 3, 2023.

Please click [here](#) to view the previous version of our Privacy Policy. **California Notice at Collection.**

power of attorney given to your authorized agent pursuant to applicable law. If you have not provided your agent with such a power of attorney, we may ask you to take additional steps permitted by law to verify that your request is authorized, such as by providing your agent with written and signed permission to exercise your rights on your behalf, the information we request to verify your identity, and confirmation that you have given the authorized agent permission to submit the request.

Sales. We do not “sell” personal information as defined by the CCPA and have not sold personal information in the preceding 12 months except to the extent that use of the interest-based advertising services described above constitutes a “sale” under the CCPA. We do not have actual knowledge that we have sold or shared the personal information of California residents who are under 16 years of age.

Retention. We will retain each category of personal information identified below for as long as reasonably necessary to maintain the Service, to meet legal and accounting obligations, and for the other purposes described in this Privacy Policy, or as otherwise required or permitted by law, unless specifically authorized to be retained longer. We may anonymize and/or aggregate personal information and store it in order to analyze aggregate metrics and trends. For more information about our retention policy, including how we determine the appropriate retention period for personal information, please see the Retention section earlier in this Privacy Policy.

Deidentification. We do not attempt to reidentify deidentified information derived from personal information, except for the purpose of testing whether our deidentification processes comply with applicable law.

Personal information that we collect, use and disclose. The chart below summarizes the personal information we collect by reference to the categories of personal information specified in the CCPA (Cal. Civ. Code §1798.140) and describes our practices currently and during the 12 months preceding the effective date of this Privacy Policy. The terms in the chart refer to the categories of information, statutory categories, and third parties described above in this Privacy Policy in more detail. Information you voluntarily provide to us, such as in free-form webforms, may contain other categories of personal information not described below. The categories of sources from which the personal information is or was collected and the business or commercial purposes for collecting such information are as described in the **“Personal information we collect”** and **“How we use your personal information”** sections above.



Privacy Policy

Effective as of February 3, 2023.

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Personal Information ("PI") we collect	CCPA Statutory category	Categories of third parties to whom we disclose PI for a business purpose	Categories of third parties with whom we "share" PI
Contact data	<i>Identifiers (online) Identifiers (other) Commercial Information California Consumer Records</i>	<i>Affiliates Service providers Sellers Payment processors Advertising partners Business and marketing partners Professional advisors Authorities and others Business transferees</i>	<i>Advertising Partners (to facilitate online advertising)</i>
Demographic data	<i>Identifiers (online) Identifiers (other) California customer records</i>	<i>Affiliates Service providers Sellers Payment processors Advertising partners Business and marketing partners Professional advisors Authorities and others Business transferees</i>	<i>Advertising Partners (to facilitate online advertising)</i>
Profile data	<i>Identifiers (online) Identifiers (other) Commercial Information California Consumer Records</i>	<i>Affiliates Service providers Professional advisors Authorities and others Business transferees</i>	<i>Advertising Partners (to facilitate online advertising) Business and marketing partners</i>
Communications data	<i>Identifiers (online) Identifiers (other) Commercial Information California Consumer Records Internet or Network Information</i>	<i>Affiliates Service providers Advertising partners Business and marketing partners Professional advisors Authorities and others Business transferees</i>	<i>Advertising Partners (to facilitate online advertising)</i>
Marketing data	<i>Identifiers (online) Identifiers (other) California Consumer Records Commercial Information Internet or Network Information</i>	<i>Affiliates Service providers Advertising partners Business and marketing partners Professional advisors Authorities and others Business transferees</i>	<i>Advertising Partners (to facilitate online advertising)</i>



Privacy Policy

Effective as of February 3, 2023.

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Personal Information ("PI") we collect	CCPA Statutory category	Categories of third parties to whom we disclose PI for a business purpose	Categories of third parties with whom we "share" PI
User-generated content data	<i>Sensory Information California consumer records</i>	<i>Affiliates Service providers Professional Advisors Authorities and Others Business Transferees Business and Marketing Partners Other users and the public</i>	None
Government-issued identification number data	<i>Identifiers (online) California customer records</i>	<i>Affiliates Service providers Professional advisors Authorities and others Business transferees</i>	None
Payment data	<i>Commercial information Financial information California consumer records</i>	<i>Affiliates Service providers Professional advisors Authorities and others Business transferees</i>	None
Buyer transaction data	<i>Identifiers (online) Identifiers (other) Commercial information California customer records Financial information Inferences</i>	<i>Affiliates Service providers Sellers Payment processors Advertising partners Business and marketing partners Professional advisors Authorities and others Business transferees Other users and the public</i>	None



Privacy Policy

Effective as of February 3, 2023.

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Personal Information ("PI") we collect	CCPA Statutory category	Categories of third parties to whom we disclose PI for a business purpose	Categories of third parties with whom we "share" PI
Seller transaction data	<i>Identifiers (online)</i> <i>Identifiers (other)</i> <i>Commercial information</i> <i>California customer records</i> <i>Financial information</i> <i>Inferences</i>	<i>Affiliates</i> <i>Service providers</i> <i>Sellers</i> <i>Payment processors</i> <i>Advertising partners</i> <i>Business and marketing partners</i> <i>Professional advisors</i> <i>Authorities and others</i> <i>Business transferees</i> <i>Other users and the public</i>	None
Seller store data	<i>Identifiers (online)</i> <i>Identifiers (other)</i> <i>Commercial information</i> <i>California customer records</i> <i>Financial information</i> <i>Inferences</i>	<i>Affiliates</i> <i>Service providers</i> <i>Sellers</i> <i>Payment processors</i> <i>Advertising partners</i> <i>Business and marketing partners</i> <i>Professional advisors</i> <i>Authorities and others</i> <i>Business transferees</i> <i>Other users and the public</i>	None
Information about others	<i>Identifiers (online)</i> <i>Identifiers (other)</i> <i>California Consumer Records</i>	<i>Affiliates</i> <i>Service providers</i> <i>Advertising partners</i> <i>Business and marketing partners</i> <i>Professional advisors</i> <i>Authorities and others</i> <i>Business transferees</i>	Advertising Partners (to facilitate online advertising)
Device data	<i>Identifiers (other)</i> <i>Internet or Network Information</i> <i>Inferences</i>	<i>Affiliates</i> <i>Service providers</i> <i>Authorities and others</i> <i>Business transferees</i> <i>Payment processors</i>	Advertising Partners (to facilitate online advertising)



Privacy Policy

Effective as of February 3, 2023.

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Personal Information ("PI") we collect	CCPA Statutory category	Categories of third parties to whom we disclose PI for a business purpose	Categories of third parties with whom we "share" PI
Online activity data	<i>Identifiers (other) Commercial Information Internet or Network Information Inferences</i>	<i>Affiliates Service providers Advertising partners Business and marketing partners Professional advisors Authorities and others Business transferees</i>	<i>Advertising Partners (to facilitate online advertising)</i>
Communication interaction data	<i>Identifiers (online) Identifiers (other) Commercial information California consumer records Internet or Network Information</i>	<i>Affiliates Service providers Payment processors Advertising partners Professional advisors Authorities and others Business transferees Business and marketing partners Other users and the public</i>	<i>Advertising partners (to facilitate online advertising)</i>
Data derived from the above	<i>Inference</i>	<i>Affiliates Service providers Advertising partners Authorities and others Business transferees Business and marketing partners</i>	<i>Advertising partners (to facilitate online advertising)</i>
Other Sensitive Personal Information <i>We do not intentionally collect this information, but it may be revealed in identity data or other information we collect</i>	<i>Protected Classification Characteristics</i>	<i>N/A</i>	<i>None</i>

Notice of Financial Incentive. We offer programs that may constitute a "financial incentive" under the CCPA, such as our TCGplayer Subscription program. If you choose to join our Subscription program, we may offer you fast & free shipping with tracking, exclusive ChannelFireball Pro content, Subscriber-only promotions, extra Bonus Bucks on eligible purchases, or other benefits.



You can opt-in to the TCGplayer Subscription program by providing the information requested when you sign up at <https://infinite.tcgplayer.com/premium/subscription>. Additional information about the TCGplayer Subscription program and activities may be found when you sign up and at <https://help.tcgplayer.com/hc/en-us/articles/360035430054>.

By participating in TCGplayer Subscription program, you may provide us personal information including (by reference to the categories in "Personal information we collect"):

- Contact data
- Profile data
- Buyer transaction data
- Seller transaction data
- Device data
- Online activity data

The value of each incentive is reasonably related to the value of your data, including as applicable: the benefit and insights that we realize and expect to realize from your participation in our programs (such as buying/selling preferences and habits); the quantity and quality of information that you provide to us through your participation; your purchase history; sales directly or indirectly generated from your participation in the relevant program; and any increased goodwill towards us.

You have the right to withdraw your participation in the TCGplayer Subscription program at any time by contacting us at sales@tcgplayer.com.

Notice to European Users

General

Where this Notice to European users applies. The information provided in this "Notice to European users" section applies only to individuals located in the EEA or the UK (EEA and UK jurisdictions are together referred to as "Europe").

Personal information. References to "personal information" in this Privacy Policy should be understood to include a reference to "personal data" (as defined in the GDPR) – i.e., information about individuals from which they are either directly identified or can be identified. It does not include "anonymous data" (i.e., information where the identity of an individual has been permanently removed). The personal information that we collect from you is identified and described in greater detail in the section "Personal information we collect".

Controller. TCGplayer is the controller in respect of the processing of your personal information covered by this Privacy Policy for purposes of European data protection legislation (i.e., the **EU GDPR** and the so-called '**UK GDPR**' (as and where applicable, the "GDPR")). See the **How to contact us section** above for our contact details.



Our legal bases for processing. In respect of each of the purposes for which we use your personal information, the GDPR requires us to ensure that we have a “legal basis” for that use.

Our legal bases for processing your personal information described in this Privacy Policy are listed below.

- Where we need to process your personal information to deliver our Services to you (including our Site) (“**Contractual Necessity**”).
- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests (“**Legitimate Interests**”). More detail about the specific legitimate interests pursued in respect of each Purpose we use your personal information for is set out in the table below.
- Where we need to comply with a legal or regulatory obligation (“**Compliance with Law**”).
- Where we have your specific consent to carry out the processing for the Purpose in question (“**Consent**”).

We have set out below, in a table format, the legal bases we rely on in respect of the relevant Purposes for which we use your personal information – for more information on these Purposes and the data types involved, see [How we use your personal information](#) above.

Purpose	Categories of personal information involved	Legal basis
Service delivery and operations	<ul style="list-style-type: none">• Contact data• Demographic data• Profile data• Communications data• Transactional data• Government-issued identification number data• Payment data	Contractual Necessity
Research and development	Any and all data types relevant in the circumstances	Legitimate interest. We have legitimate interest in understanding what may be of interest to our customers, improving customer relationships and experience, delivering relevant content to our customers, measuring and understanding the effectiveness of the content we serve to customers. Consent, in respect of any optional cookies used for this purpose.



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Purpose	Categories of personal information involved	Legal basis
Direct marketing	<ul style="list-style-type: none">• Contact data• Account data• Profile data• Payment data• Transactional data• Communications data• Marketing data	<p>Legitimate Interests. We have a legitimate interest in promoting our operations and goals as an organization and sending marketing communications for that purpose.</p> <p>Consent, in circumstances or in jurisdictions where consent is required under applicable data protection laws to the sending of any given marketing communications.</p>
Compliance and protection	Any and all data types relevant in the circumstances	<p>Compliance with Law.</p> <p>Legitimate interest. Where Compliance with Law is not applicable, we and any relevant third parties have a legitimate interest in participating in, supporting, and following legal process and requests, including through co-operation with authorities. We and any relevant third parties may also have a legitimate interest of ensuring the protection, maintenance, and enforcement of our and their rights, property, and/or safety.</p>



Purpose	Categories of personal information involved	Legal basis
Further uses	Any and all data types relevant in the circumstances	<p>The original legal basis relied upon, if the relevant further use is compatible with the initial purpose for which the Personal Information was collected.</p> <p>Consent, if the relevant further use is not compatible with the initial purpose for which the personal information was collected.</p>

Retention

We retain personal information for as long as necessary to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements, to establish or defend legal claims, or for compliance and protection purposes, unless specifically authorized to be retained longer.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

When we no longer require the personal information, we have collected about you, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible. If we anonymize your personal information (so that it can no longer be associated with you), we may use this information indefinitely without further notice to you.

Other information

No obligation to provide personal information. You do not have to provide personal information to us. However, where we need to process your personal information either to comply with applicable law or to deliver our Services to you, and you fail to provide that personal information when requested, we may not be able to provide some or all of our Services to you. We will notify you if this is the case at the time.

No sensitive personal information. We ask that you not provide us with any sensitive personal information (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on or through the Services, or otherwise to us. If you provide us with any sensitive personal information to us when you use the Services, you must consent to our processing and use of such sensitive personal information in accordance with this Privacy Policy. If you do not consent to our processing and use of such sensitive personal information, you must not submit such sensitive personal information through our Services.



No Automated Decision-Making and Profiling. As part of the Services, we do not engage in automated decision-making and/or profiling, which produces legal or similarly significant effects. We will let you know if that changes by updating this Privacy Policy.

Security. We have put in place procedures designed to deal with breaches of personal information. In the event of such breaches, we have procedures in place to work with applicable regulators. In addition, in certain circumstances (including where we are legally required to do so), we may notify you of breaches affecting your personal information.

Your rights

General. European data protection laws give you certain rights regarding your personal information. If you are located in Europe, you may ask us to take any of the following actions in relation to your personal information that we hold:

- **Access.** Provide you with information about our processing of your personal information and give you access to your personal information.
- **Correct.** Update or correct inaccuracies in your personal information.
- **Delete.** Delete your personal information where there is no lawful reason for us continuing to store or process it, where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal information to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons that will be notified to you, if applicable, at the time of your request.
- **Portability.** Port a machine-readable copy of your personal information to you or a third party of your choice, in certain circumstances. Note that this right only applies to automated information for which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Restrict.** Restrict the processing of your personal information, if, (i) you want us to establish the personal information's accuracy; (ii) where our use of the personal information is unlawful but you do not want us to erase it; (iii) where you need us to hold the personal information even if we no longer require it as you need it to establish, exercise or defend legal claims; or (iv) you have objected to our use of your personal information but we need to verify whether we have overriding legitimate grounds to use.
- **Object.** Object to our processing of your personal information where we are relying on legitimate interests (or those of a third party) and there is something about your particular situation that makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedom – you also have the right to object where we are processing your personal information for direct marketing purposes.
- **Withdraw Consent.** When we use your personal information based on your consent, you have the right to withdraw that consent at any time. This will not affect the lawfulness of any processing carried out before you withdraw your consent.



Exercising These Rights. You may submit these requests by submitting a data deletion request here, submitting a data access request here, or by email at sales@tcgplayer.com. We may request specific information from you to help us confirm your identity and process your request. Whether or not we are required to fulfill any request you make will depend on a number of factors (e.g., why and how we are processing your personal information), if we reject any request you may make (whether in whole or in part) we will let you know our grounds for doing so at the time, subject to any legal restrictions. Typically, you will not have to pay a fee to exercise your rights; however, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. We try to respond to all legitimate requests within a month. It may take us longer than a month if your request is particularly complex or if you have made a number of requests; in this case, we will notify you and keep you updated.

Your Right to Lodge a Complaint with your Supervisory Authority. In addition to your rights outlined above, if you are not satisfied with our response to a request you make, or how we process your personal information, you can make a complaint to the data protection regulator in your habitual place of residence.

- For users in the European Economic Area – the contact information for the data protection regulator in your place of residence can be found here: https://edpb.europa.eu/about-edpb/board/members_en.
- For users in the UK – the contact information for the UK data protection regulator is below:

The Information Commissioner's Office
Water Lane, Wycliffe House
Wilmslow - Cheshire SK9 5AF
Tel. +44 303 123 1113
Website: <https://ico.org.uk/make-a-complaint/>

Data Processing outside Europe

We are a US-based company and many of our service providers, advisers, partners or other recipients of data are also based in the US. This means that, if you use the Services, your personal information will necessarily be accessed and processed in the US. It may also be provided to recipients in other countries outside Europe.

It is important to note that the US is not the subject of an 'adequacy decision' under the GDPR – basically, this means that the US legal regime is not considered by relevant European bodies to provide an adequate level of protection for personal information, which is equivalent to that provided by relevant European laws.

Where we share your personal information with third parties who are based outside Europe, we try to ensure a similar degree of protection is afforded to it in accordance with applicable privacy laws by making sure one of the following mechanisms is implemented:

- **Transfers to territories with an adequacy decision.** We may transfer your personal information to countries or territories whose laws have been deemed to provide an adequate level of protection for personal information by the European Commission or UK Government (as and where applicable)(from time to time).



- **Transfers to territories without an adequacy decision.**

- We may transfer your personal information to countries or territories whose laws have not been deemed to provide such an adequate level of protection (e.g., the US, see above).
- However, in these cases:
 - we may use specific appropriate safeguards, which are designed to give personal information effectively the same protection it has in Europe – for example, standard-form contracts approved by relevant authorities for this purpose; or
 - in limited circumstances, we may rely on an exception, or ‘derogation’, which permits us to transfer your personal information to such country despite the absence of an ‘adequacy decision’ or ‘appropriate safeguards’ – for example, reliance on your explicit consent to that transfer.

You may contact us if you want further information on the specific mechanism used by us when transferring your personal information out of Europe.