Privacy Policy

This policy was published on June 15, 2023, and will take effect on July 24, 2023. The previous version of this policy can be viewed <u>here</u>.

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At Etsy, we care deeply about privacy. We strive to be transparent about our privacy practices, including how we treat your personal information.

This policy explains our privacy practices for Etsy.com (which we'll refer to as the "Site"), Etsy's mobile applications, including the Etsy App and the Etsy Seller App (together, the "Apps"), Etsy Payments, Pattern by Etsy, Etsy's public Application Programming Interface (the "API"), and other services provided by Etsy, Inc. or Etsy Ireland UC, depending on your location (which we'll refer to as "Etsy," or as "we," "us," and "our"). We'll use the term "Services" to refer collectively to the Site, the Apps, Etsy Payments, Pattern by Etsy, and the API.

This policy applies to our registered buyers ("Buyers") and sellers ("Sellers") (together, our "Members"), those who purchase items on Etsy without an account ("Guests") and anyone else who visits our Sites or uses our Services (together with our Members and Guests, "you" and "your"). If you are not a registered Member or a Guest, please see our Non-Member Privacy Policy for further information about how we may collect and use your personal information, available here.

This policy does not apply to the practices of third parties (including Sellers, Pattern by Etsy users or API users) who you may choose to share information with when you use the Services. Please note that the collection and use of your information by these third parties is subject to their own privacy policies and terms. You should understand the privacy and security practices of any third party before you share information with them.

It is important that you understand how we use your information. You should read this policy in full, but some key points and references to help you navigate the policy are:

- Our mission at Etsy is to keep human connection at the heart of commerce. We connect Buyers with Sellers that offer handmade or vintage products and craft supplies. By accepting our Terms of Use and this Privacy Policy, or by using any of our Services, you confirm that you have read and understand this policy, including how and why we use your information.
- We collect and use your personal information to provide and improve our Services, to protect the security and integrity of our Services and to comply with our legal obligations. To learn more about what information we collect and how we use it, see Section 1 and Section 2 below.
- We share your information with other Etsy group companies, trusted partners and service providers to provide our Services, for security purposes, to understand how you use and interact with our Services and to meet our legal obligations. To learn more, see Section 3.
- If you are located outside of North or South America, Etsy Ireland UC is the service provider and data controller responsible for your personal information. If you are located within North or South America, Etsy, Inc. is the service provider and data controller responsible for your personal information. The contact details for both companies are set out in Section 11.
- Other policies that are referenced below, such as the <u>Terms of Use</u> and <u>Cookies & Similar Technologies Policy</u>, are available from Our House Rules page, located <u>here</u>.
- If you have any questions about this Privacy Policy, or wish to exercise your rights, see <u>Section 11</u> for further information about how to contact us.

1. What Information We Collect and Receive

In the course of providing our Services, we collect and receive information that directly or indirectly relates to you (which we call your "personal information") in different ways and from different sources, which we have set out below. The capitalized terms in this <u>Section</u>

 $\underline{1}$ are definitions that we use throughout this Policy, so please refer back to this table as necessary.

Information Category	Description of Information Collected	
Information You Provide to Us		
	when you sign up for an Etsy account or otherwise e Services.	
Buyer Account Information We collect certain information from you when you set up an Etsy Buyer account and use the Services.	Buyer Details: Your name, email address, and phone number	
	Buyer Payment Information: Your billing address and payment information (e.g., credit or debit card details or other payment credentials, like PayPal)	
	Delivery Information: Your delivery address, contact name, and phone number (in certain countries outside of the EU)	
	Regional Information: Your country, preferred language, and currency	
Seller Account Information We collect certain information from you when you set up an Etsy Seller account and use the Services.	Seller Details: Your name, valid identification, email address, country of residence, phone number, date of birth, taxpayer address, and Etsy shop name	
	 Seller Payment Information: Your bank country, bank account details, billing address and other payment information (e.g., credit or debit card details or PayPal credentials) Shop Preferences: Your preferred language, country, and currency 	
	 Business/Tax Information: Your tax and government-issued identification numbers Regional Information: Your country, 	
	preferred language, and currency	

Buyer Public Profile Information

As a Buyer on Etsy, you can choose to provide your name and other personal information in connection with your account and activity. Other people will be able to see your profile information.

You can edit, remove or limit this information through your account settings.

- Name
- Birthday
- Gender
- Location
- Profile photo
- Your bio, story and story headline
- Your favorite items and favorite stores
- Linked third-party accounts (e.g., social media, "sign-in with")
- Product reviews
- Registry information (e.g., name, partner name, wedding or special event date, shipping information)

Seller Public Profile Information

As a Seller on Etsy, you must provide certain information for your shop. You can also choose to share other personal information (such as birthday, gender or location) in connection with your account and activity. Other people will be able to see your profile information.

You can edit, remove, or limit this information through your account settings.

- Shop name
- Your name
- Birthday
- Gender
- Location and/or business address (if applicable)
- Profile photo
- Your bio, story, story headline, shop photos, and shop links
- Vacation mode announcements
- Linked third-party accounts (e.g., social, "sign-in with")
- Shop policies (e.g., returns)

Guest Checkout Information

You can purchase goods on Etsy without an account through our 'Guest Checkout' feature. We need certain information about you to facilitate your purchase.

- Your name
- Email address
- Billing name and address
- Credit or debit card information or other payment method
- Shipping name and address

Transaction Information

When you buy or sell goods on Etsy, we collect information about the order as part of your transaction history.

 Information about the transactions made on our Services, such as the shop name, items purchased, Buyer's name, purchase price, and date of the transaction

Photographs and Videos

You may enable the Apps to access your mobile device's camera to upload photographs and videos to Etsy, or you can upload photos and videos directly through our Site.

 Photos and videos you upload to your profile, our forums, as part of product reviews or through Etsy's other products and features (e.g., search)

Forums/Community Information

We offer several features that allow users to connect and communicate in public or semi-public spaces, such as Forums and Teams, which are a part of the Etsy Community space.

- Content you post in our community spaces
- Any additional information you choose to provide

Messages Information

You can contact another Member using Etsy Messages for a variety of reasons, such as customer support, personalizing products, or product and order questions.

- Message Content: Content you share with, or receive from, other Members through our Messages function
- Message Metadata: Metadata about content (such as the location where a photo was taken) and Messages (such as the date and time of the message)

Promotion Information

From time to time, Etsy runs promotional offers, contests and sweepstakes.

The types of information we collect will be governed by the terms of the relevant promotion, which can be viewed on <u>Our House Rules</u> page. However, in general, we will collect the following information about entrants:

- Email address
- Social handle (if social promotion)

Customer Support Information

We collect certain information when you engage with our customer support teams.

- Your communications with our support team
- Any additional information you provide, including transaction information (e.g., order number and transaction ID), and/or device and technical information (e.g., IP address for troubleshooting)

Survey Responses and Market Research

You may choose to provide certain information in connection with surveys, research and other feedback mechanisms.

- Demographic information, including your age, gender, work status, region and neighborhood type (e.g., rural, suburban, or urban) and, if you are located in the US, your income, education and race/ethnicity
- Business and selling information, such as the size of your business, any other selling channels you use, your business income breakdown (by percentage) for each selling channel
- Any additional information you may provide

Information We Collect Automatically

Etsy automatically receives and records information from your browser or your mobile device when you visit the Site, use the Apps, or use certain features of the Services (even if you do not have an Etsy account).

Browser and Device Information

Etsy automatically receives and records information from your browser or your mobile device when you visit the Site, use the Apps, or otherwise install, access or use certain features of the Services.

- Browser and device information, including your IP address, device type, hardware model, operating system information, unique device identifier, and your detected language
- App information, including app version, app usage and debugging information, and app ID

Service Usage Information

We collect certain information about your use of the Services, such as how often you use the Apps, how you interact with the Services, and actions you take when interacting with the Site and Apps, in order to help us ensure the Services are functioning correctly, tailor your experience, and improve our offerings. We may collect this information from a subset of users when testing new products or features.

- Usage Information: Information about your interaction with our Sites and Apps, including how often you use the Sites and/or Apps, what happens within the Sites and/or Apps, what listings you view and interact with, or other actions you take (such as clicking on particular parts of the Site or Apps)
- Diagnostic and Troubleshooting Information: Information about how our Services are performing when you use them, like service-related diagnostic and performance information, including timestamps, crash data, website performance logs and error messages or reports

General Location Information

We use your general location information for things like tailoring our Services to your location and to estimate shipping costs. See Section 2 for further details on how we use this information.

- IP addresses and other information like your zip or postal code, to estimate your general location (e.g., country, state, or city)
- The general location you set in your regional preferences on the Site or Apps

Precise Location Information

We use your precise geo-location where you have given us permission to do so through your device-based settings. See Section 2 for further detail.

Your precise geo-location collected from your device

Cookie Information

 For more information about these online tools and how we use them, see our <u>Cookies &</u> <u>Similar Technologies Policy</u>

Information We Receive from Third Parties

We receive certain information about you from third parties.

Information from our Payment Processors

We receive certain information about Buyers from our third-party payment processors, such as Paypal, who help us to process

- Your first and last name
- Your billing address
- Your email address
- Your phone number

transactions, provide our Services and prevent fraudulent or illegal activity.

Information from Advertising and Marketing Partners

We receive certain information about you from our advertising and marketing partners, including in some instances what marketing content you viewed or clicked the actions you take on our Sites and Apps. This information helps us determine how our marketing campaigns and other customer interactions may contribute to sales, conversions, or other goals.

- We may receive from our third-party partners (or may collect directly), for example, attribution information via cookies and UTM tags in URLs to help us determine the source of the traffic to Etsy or track the performance of a specific campaign
- We may also receive responses to marketing emails and advertisements, responses to offers, and audience information from partners who you have given consent to share that information with us

Analytics Information

We use data analytics software to ensure Site and App functionality and to improve the Services. For more information, see Etsy's Cookies & Similar Technologies Policy and Cookies & Similar Technologies Disclosures.

 We use third-party software to record information such as how often you use the Site and/or Apps, what happens within the Apps or on our Site (e.g., how you interact with our Services), aggregated usage, performance data, app errors and debugging information, and, in the case of Apps, where the Apps were downloaded from

Third-Party Application Information

We receive certain information when you engage with third-party applications or platform integrations on other sites and apps.

 When you link our Services with third-party applications or integrations (e.g., linked third-party accounts), we receive your contact information, including your name and email address, and any additional information you authorize the third party to share with us (for example, social media accounts and/or sign-in functionality)

Non-Member Information

Etsy receives or obtains information about a person who is not yet a registered Etsy Member or Guest and has not directly made a purchase (a "Non-Member") in connection with certain Etsy features, such as when a Non-Member chooses to subscribe to an Etsy newsletter, a Member invites a Non-Member to visit the Site, a Member uploads Non-Member information to send a gift or when a Member sends a gift card code to a Non-Member. For more information, please see our Non-Member Privacy Policy, available here.

- Non-Member email address
- Non-Member IP address
- Non-Member physical postal address

2. How We Use Your Information and Our Legal Basis

When you access or use the Services or interact with our Sites and/or Apps, we collect, use, share, and otherwise process your personal information for the purposes described in this policy. To the extent required by applicable law, we rely on a number of legal bases to

use your information in these ways. If you reside outside the European Economic Area ("EEA"), Switzerland or the United Kingdom ("UK") (together referred to as the "European Region"), the legal bases on which we rely may differ from those listed below.

Why and How We Use Your Information	Information Categories Used	
Where necessary to pe	rform our contract with you	
We use certain information that is necessary for us to provide you with the Services and perform our Terms of Use or other relevant contract(s) with you. We will need to close your account if we cannot process your personal information for such purposes.		
To create and maintain your Etsy account and provide our Services We collect certain information in order to set up your Etsy account and to allow you to interact with the Etsy Community.	 Buyer Account Information Seller Account Information Buyer Public Profile Information Seller Public Profile Information Browser and Device Information Forums/Community Information Third-Party Application Information (where relevant) 	
To facilitate buying and selling on Etsy We use certain information to facilitate buying and selling on Etsy. This can also involve us sharing your information with some of our third-party partners – such as our shipping and payment partners – to enable us to provide the Services to you pursuant to our Terms of Use. Such partners will process your personal information in accordance with their own privacy policies. For more information, please see Section 3.	 Buyer Account Information Seller Account Information General Location Information Information from our Payment Processors Guest Checkout Information Transaction Information Photographs and Videos, including where you use certain features to search for products Customer Support Information 	
To provide our Etsy Payments service As an Etsy Seller, you may use our payment service, Etsy Payments, to accept various forms of payments on the Site, Apps, and other Services. You will need to provide certain information to set up an account. For more information, see the Etsy Payments Policy .	Seller Account Information	
To provide Guest Checkout	 Guest Checkout Information Browser and Device Information Transaction Information 	

Why and How We Use Your Information	Information Categories Used
We allow Guests to purchase items from Etsy without an account through Guest Checkout.	
To promote the safety, security and integrity of our Services We use certain information to verify accounts and related activity, including through our two-factor authentication process ("2FA"), to find and address violations of our Terms of Use, investigate suspicious activity, detect, prevent and combat fraudulent or other unlawful behavior (including by automated means) and to maintain the integrity of our Service.	 Buyer Public Profile Information Seller Public Profile Information Buyer Account Information Seller Account Information Browser and Device Information Customer Support Information Information from our Payment Processors Messages Information, subject to applicable law
To send Service communications We use certain information to send you administrative or account-related communications about our Services, including to verify your email address, welcome you to the Services, confirm a transaction, or notify you about an order, service availability, changes to the Services, or updates to this Policy, our Terms of Use, or other policies. You may not opt out of receiving service communications, such as emails or mobile notifications sent for legal, security, or other transactional purposes.	 Buyer Account Information Seller Account Information Transaction Information
To run promotions and sweepstakes We use certain information about entrants to our promotions and sweepstakes to manage the relevant promotion and, where applicable, identify the relevant winner(s).	Promotion Information
To provide customer support We use your information to respond to requests for support (via the Apps, Site, or email) and to respond to customer care and other inquiries, including providing telephone-based customer support to Members or Guests (who provide their telephone numbers).	 Buyer Account Information Seller Account Information Guest Checkout Information Transaction Information Service Usage Information General Location Information Customer Support Information

Where necessary to comply with our legal obligations

Our Services are subject to laws and regulations that require us to collect, use, and store your personal information in certain ways. Where applicable, if you do not provide the personal information required by law, we will have to close your account.

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Why and How We Use Your Information	Information Categories Used
To comply with local laws on selling goods For example, in certain countries, we are required to display certain information about our Sellers on Etsy.	 Buyer Public Profile Information Seller Public Profile Information Buyer Account Information Seller Account information
To verify your identity	
To become an Etsy Seller, we need to verify your identity to comply with our obligations under a variety of laws, such as the Digital Services Act and anti-money laundering laws.	Seller DetailsSeller Account Information
To comply with legal and regulatory obligations	
Etsy may also use, preserve, or release your personal information to a third party to comply with our legal and regulatory obligations, including in response to lawful requests by public authorities (including tax authorities) and to meet legitimate national security or law enforcement requirements. For example, we may be required to collect,	
use or disclose your information in connection with: Civil, commercial, criminal or consumer protection matters or litigation: where we are in receipt of a court order to disclose information or receive regulatory inquiries (e.g., under the Irish Competition and Consumer Protection Act 2014, the Consumer Rights Act 2022, or the Liability For Defective Products Act, 1991).	 Buyer Public Profile Information Seller Public Profile Information Buyer Account Information Seller Account Information Information from our Payment Processors General Location Information Browser and Device Information Messages Information, subject to applicable law
Corporate and taxation matters: to comply with our corporation and taxation obligations, such as those under the Irish Companies Act 2014 and the Taxes Consolidation Act 1997 and the Internal Revenue Service code.	
Regulatory matters: to comply with our regulatory obligations, including as an e-commerce platform arising under the P2B	

Regulation, the Digital Services Act and similar regulations.

We may also be required to collect, use or disclose your information to comply with our obligations to engage with regulators, including but not limited to the Irish Competition and Consumer Protection Commission, the Central Bank of Ireland, the U.S. Securities and Exchange Commission, the U.S. Office of Foreign Assets Control (OFAC), and other regulatory bodies.

Where necessary for our legitimate interests

We rely on our legitimate interests or those of third parties (like other Buyers and Sellers, and in some cases, the general public) where they are not outweighed by your rights and freedoms. In the EEA and UK, you have the right to object to, and seek the restriction of, this processing. To learn more, see Section 7.

Why and How We Use Your Information	Legitimate Interests Relied On	Information Categories Used
To understand how you use our Services and improve your experience on Etsy We use certain information to improve our Services, including to ensure the Services are functioning correctly, to help Sellers find the best ways to market and sell their products on Etsy, to identify and support high-performing Sellers, and for general research and aggregate reporting.	It is in our legitimate interests to understand how our Services are being used, and to explore and unlock ways to develop and grow our business. It is in our legitimate interests, and those of our Members, to improve the efficiency of our Services, troubleshoot errors with our Services, increase interest in our Services, and obtain insights into usage patterns of our Services.	 Service Usage Information Browser and Device Information Cookie Information Customer Support Information Survey Responses and Market Research Information from Advertising and Marketing Partners Analytics Information General Location Information
To rank your search results We use certain information to rank your search results. When a Member or Guest searches for an item on Etsy, Etsy's search engine works to return the most relevant matches based on the	It is in our legitimate interests, and those of our Members, to customize our Services, including identifying products	 Service Usage Information Browser and Device Information Shop Preferences

search query and the Information Categories listed here. We may also highlight a cross-section of shops or listings organically, above or alongside primary search results. Etsy does not offer Sellers a higher ranking placement in organic search results in exchange for any compensation or fee. Sellers can, however, purchase on-site ads, called Etsy Ads, which are identified separately as ads on Etsy (discussed below). For more information on how Etsy Search works, see our Search and Advertisement Ranking Disclosures.	that our Buyers would be most interested in.	
To provide on-platform advertising on our Sites and Apps		
Sellers can purchase paid advertising on Etsy ("Etsy Ads"). Etsy Ads display a Seller's listings or shops prominently on the Sites and/or Apps (and are marked as "Seller Ads"). Etsy Ads are displayed in one or more locations, such as Members' and Guests' search results. For more information on Etsy Ads, see our Advertising and Marketing Policy and our Search and Advertisement Ranking Disclosures.	It is in our legitimate interests, and those of our Sellers, to help Sellers reach the most appropriate audience for their goods.	 Service Usage Information Browser and Device Information General Location Information Buyer Public Profile Information Guest Checkout Information Transaction Information
To display non-personalised advertising on third-party platforms and sites		
We use your information for non-personalized ads for our Services on third-party platforms and sites. For example, we purchase offsite advertising from a network of participating providers, such as social networks and search engines. See the Etsy Offsite Ad Channels for further information. You may see ads for Etsy on these channels even if you have opted-out of personalized advertisements. If you are a Seller, we may use information about you in order to feature you in marketing and advocacy materials, and to feature you and your shop on and off the platform, as provided for in Etsy's Terms of Use.	It is in our legitimate interests to promote the Services and listings on third-party platforms and sites.	 Information from Advertising and Marketing Partners Cookie Information

To facilitate Seller campaigns, surveys and petitions Sellers have the ability to sign onto campaigns, surveys, or petitions for causes they care about or to donate to these causes. To facilitate this, we need to collect and use certain information

It is in our legitimate interests and our Members' interests to provide these services and to conduct surveys to help us in improving our Services.

- Seller Public Profile Information
- Seller Account Information
- Etsy Payments Information (for charitable donations)

To keep our Services safe and secure

about our Members.

We collect and store your information and, in some cases, apply automated processing and manual (i.e., human) review to maintain the security and integrity of our Services. This involves taking steps to detect, investigate and otherwise protect our community against spam, abuse, harassment, intellectual property infringement, crime, suspected fraud, harm, suspected violations of Etsy's Terms of Use and safety and security risks of all kinds.

It is in our legitimate interests, and those of our Members, to ensure the security of our Services, to verify accounts and activity, to combat harmful or inappropriate conduct or content and to detect, prevent and address spam.

It is in our legitimate interests, those of our Members and the general public to enforce our House Rules, Terms of Use and associated policies, including to prevent or address fraud and other illegal activities.

- Buyer Public Profile Information
- Seller Public Profile Information
- Buyer Account Information
- Seller Account Information
- Transaction Information
- Messages
 Information,subject to applicable law
- Service Usage Information

To protect our legal rights

Etsy may also retain, preserve or review your personal information to protect, establish, or exercise our legal rights or defend against impending or asserted legal claims, including to collect a debt or address a violation of our Terms of Use and policies (including our Intellectual Property Policy).

For example, in accordance with our existing case resolution process, we may use information you provide to resolve disputes with Etsy or other Users.

- Buyer Public Profile Information
- Seller Public Profile Information
- Buyer Account Information
- Seller Account Information
- Etsy Payments Information
- Transaction Information
- Service Usage Information
- Messages
 Information, subject to applicable law

To share information with law enforcement and respond to legal requests

We may share your information with a third party, including law enforcement authorities, where not compelled by law when we believe in good faith that such use and/or disclosure is reasonably necessary to detect, prevent or prosecute illegal activity or to prevent imminent death or imminent bodily harm.

The categories of information that we access, preserve, use and share for these purposes will depend on the specific circumstances.

To learn more about how and why Etsy shares information in these circumstances, see Section 3 and review our Requests for Information Policy.

It is in our legitimate interests and the interests of the general public to share information with third parties, including as part of investigations or regulatory inquiries, to detect, investigate and prosecute illegal activity or to prevent death or imminent bodily harm.

- Buyer Public Profile Information
- Seller Public Profile Information
- Buyer Account Information
- Seller Account Information
- Etsy Payments Information
- Transaction Information
- Messages
 Information, subject to applicable law
- Service Usage Information

In the event of a business reorganization

In some cases, Etsy may choose to reorganize its business. In these types of transactions (such as a sale, merger, liquidation, receivership, reorganization, or transfer of all or substantially all of Etsy's assets), Member information is typically one of the business assets that is transferred.

Such transactions may be necessary and in our legitimate interests, particularly our interest in making decisions that enable our business to develop over the long term.

- Buyer Public Profile Information
- Seller Public Profile Information
- Buyer Account Information
- Seller Account Information

Where you provide your consent

When we use your information based on your consent, you have the right to withdraw your consent at any time on a go-forward basis (meaning our prior use of your data will not be affected). You may change your device-based or in-app settings anytime. Learn More.

To send you email marketing

In certain countries (such as those in the EU), we may need your consent to send you email marketing messages. You will be given the opportunity to opt out of each marketing communication that we send.

- Buyer Account Information
- Seller Account Information
- Browser and Device Information
- Transaction Information
- Information from Advertising and Marketing Partners
- Service Usage Information

In the European Region, to personalize your experience on the Sites and Apps

For users in the European Region, we rely on your consent to personalize your experience on the Sites and Apps to help you search for and discover relevant items.

- Service Usage Information
- Browser and Device Information
- General Location Information
- Transaction Information

To personalize the ads you see on third-party platforms and sites

We rely on your consent to personalize the ads you see for Etsy listings on third-party platforms and sites.

This targeted marketing includes third-party tools, including those offered by Facebook Custom Audience and Google Customer Match, and we may use analytics aggregated from your Service Usage Information including, for example, search keywords, favorites, browsing history and purchase history in combination with the Information Categories listed here.

- Buyer Details
- Service Usage Information
- Cookie Information

To collect your information through the device-based settings that you have enabled

We rely on your consent to:

- collect your device-based Precise Location Information for: (a) local content, to personalize and tailor the Services, including search results and recommendations; and (b) delivery, and shipping services; and
- access your camera and/or photo gallery if you choose to share photos or media on our Services.
- Precise Location Information
- Photographs and Videos

Data used for tasks carried out in the public interest

<u>To preserve, review and share information to</u> perform a task in the public interest

In limited, fact-specific circumstances, we will access, preserve and share your information with regulators, law enforcement or others where necessary to perform a task in the public interest. For example, we might share information with others for the purposes of combating unlawful or harmful behavior where it is in the public interest to do so and where the public interest is laid down by applicable law (including EU or Member State law, where required).

- Buyer Account Information
- Seller Account Information
- Buyer Public Profile Information
- Seller Public Profile Information
- Information from our Payment Processors
- Transaction Information
- Messages Information, subject to applicable law

Data use to protect your or others' vital interests

To preserve, review and share information with law enforcement and others

We may preserve, review and share information with law enforcement and others in circumstances where someone's vital interests require protection, such as in the case of emergencies. For example, we may need to share information to prevent loss of life or personal injury of an Etsy Buyer or Seller or other third party or to prevent crime or fraud.

- Buyer Account Information
- Seller Account Information
- Buyer Public Profile Information
- Seller Public Profile Information
- Information from our Payment Processors
- Transaction Information
- Messages Information, subject to applicable law

3. How We Share Your Information

We share your data with third parties where necessary to perform the Services, comply with our legal obligations, or for purposes set out in this Privacy Policy, including:

Publicly Displayed Information: By using the Services, certain information about you will be publicly displayed on the Site and Apps, such as Buyer Public Profile Information and Seller Public Profile Information (as defined in Section 2). Buyers and Sellers can choose to make certain information and activities private through their account or Public Profile settings. Other information connected with your use of the Services will also be publicly displayed, including the date you joined, information relating to items you review, photos or videos of items you purchased, your saved product listings that are grouped by you ("Favorites and Collections"), , followers, those you follow, comments you post in our community spaces, and information you decide to share via social networks. Your reviews of shops or items you've purchased may also be shared on other platforms and search engines, including Google.

For Sellers, some additional information will be publicly displayed. For example, your shop name or or business name associated with your account (which you may modify and update in your account settings) is publicly displayed.

Etsy Group Companies: We may share some of the information that we collect, such as Buyer Account Information, Seller Account Information, Service Usage Information, Device and Browser Information, and Cookie Information, with our corporate affiliates, which include Etsy, Inc., Etsy Ireland UC, Etsy UK, Ltd., and other Etsy entities that help us conduct business around the world (together, the "Etsy Group Companies"). We do not share your personal information with our sister companies like Depop, Elo7 or Reverb. The information shared among the Etsy Group Companies may be used for the purposes described in this Privacy Policy and generally to operate our business, including for ID verification purposes, transaction monitoring and payment processing or to provide customer support, facilitate business development, administer user accounts or provide IT, technical and engineering support.

Sellers: We may share aggregated information about your use of the Services to Sellers if you are a frequent purchaser or a new Buyer, so they can provide you with better service and so we can improve our Site and Apps.

Linked Third-Party Websites or Services: Some Members may choose to connect to Etsy or register an Etsy account using an external third-party application, such as Facebook or Google. Connecting your Etsy account to third-party applications or services is optional. If you choose to connect your account to a third-party application, the providers of those services or products may receive information about you that Etsy, you, or others share with them. Please be aware that when you use third-party sites or services, their own terms and privacy policies will govern your use of those sites or services.

You may also link your bank account or payment method to pay for purchases (or receive payment, in the case of Sellers in select markets) through a third-party service available through the Site or Etsy App. When you register with these third-party partners, we will tell you what information is collected and what information the third-party will share with Etsy.

Business Partners: Etsy works closely with a number of business partners, such as our shipping and payment partners, that assist us with providing the Services in accordance with our <u>Terms of Use</u>. When one of these companies assists us in facilitating your transaction, we, or they, may need to share information related to the transaction in order to complete your order. Etsy also provides services or sells products jointly with affiliated businesses, such as services that assist our Sellers with accounting or other small business management services. These affiliated businesses may sell items or services to you through the Services or offer promotions (including email promotions). In each case, these partners will process your personal information in accordance with their own privacy policies. We encourage you to read the privacy policies and ask questions of third parties before you disclose your personal information to them.

Professional Advisors, Industry Partners, Authorities and Regulators: We share your information described in <u>Section 3</u> with our advisors and consultants, regulators and tax authorities, law enforcement, government agencies, civil litigants, and industry partners (for example, trade groups) to:

- comply with applicable law or regulations, court orders, subpoenas, legal process or government requests;
- detect, investigate, prevent, or address actual or suspected fraud, violations of Etsy's <u>Terms of Use</u>, and other illegal activity or security and technical issues; and/or
- protect the rights, property and safety of our Members, Etsy and the Etsy Group Companies, or others, including to prevent death or imminent bodily harm.

Business Reorganization: In some cases, Etsy may choose to reorganize its business. In these types of transactions (such as a sale, merger, liquidation, receivership, or transfer of all or substantially all of Etsy's assets), Member information is typically one of the business assets that is transferred. If Etsy intends to transfer information about you, Etsy will notify you by email or by putting a notice on the Site and the Apps.

Community Services: We engage third parties to assist in providing Community Services, which includes the Etsy Forums and Teams, and need to share certain information about you for these purposes. This may include, for example, Buyer Public Profile Information and Seller Public Profile Information, the date that you registered on Etsy, as well as your language and regional settings on the Site. For more information, see our <u>Community Policy</u>.

Service Providers: Etsy also engages third-party companies and individuals (such as research companies, analytics services, and security providers) to help us operate, provide, and advertise the Services. These third parties have limited access to your information, may use your information only to perform these tasks on our behalf, and are prohibited from disclosing or using your information for other purposes. The types of third-party service providers that we work with include:

Third-Party Service Providers	What Information We Share
 Research companies Analytics providers Security providers Software service providers Infrastructure and technical service providers Professional service providers Customer service or other outsourced service providers 	 Buyer Public Profile Information Seller Public Profile Information Buyer Account Information Seller Account Information Guest Checkout Information Transaction Information Forum/Community Information General Location Information Photos and Videos Customer Support Information Browser and Device Information Service Usage Information Survey Responses and Market Research Analytics Information

4. How We Transfer Your Information

Etsy operates a global e-commerce platform. By using the Services, you acknowledge that Etsy will use your information in the United States, Ireland and any other country where the Etsy Group Companies operate. Please be aware that the privacy laws and standards in certain countries, including the rights of authorities to access your personal information, may differ from those that apply in the country in which you reside. To the extent that Etsy is deemed to transfer personal information outside of the EEA, we rely separately, alternatively, and independently on the following legal bases to transfer your information:

Adequacy Decisions Where available, we rely on decisions of the European Commission, known as "adequacy decisions," recognising that certain countries offer a level of protection of personal data that is essentially equivalent to the EEA. A list of adequacy decisions is available here via the European Commission website.

Standard Contractual Clauses Otherwise, we primarily rely on the European Commission's Standard Contractual Clauses for the international and onward transfer of personal data outside of the EEA to third countries, including, for example, to the United States and India. This includes transfers from Etsy Ireland UC to Etsy, Inc. and other Etsy Group Companies. You can request a copy of our Standard Contractual Clauses by emailing dpo@etsy.com.

Necessary for the Performance of the Contract Between Etsy and Its Users You can choose whether or not to use the Etsy Services. As we operate in countries worldwide and use technical infrastructure in the US to deliver the Services to you, in accordance with the contract between us (our <u>Terms of Use</u>), we transfer your personal information to the US and to other jurisdictions as necessary to provide the Services. Simply put, we can't provide you with the Services and perform our contract with you without moving your personal information outside of your home country, including the UK or EEA

5. How We Protect Your Information

The security of your personal information is important to us. We protect your personal information through technical and administrative measures designed to mitigate the risk of unlawful or unauthorized access, destruction, loss, alteration, disclosure or use of your data. To protect your account, we encourage you to choose your password carefully and enable two factor authentication (2FA) for signing in. You can learn more about enhancing your account security in your account settings.

We use Google reCAPTCHA Enterprise in connection with our Services to help prevent spam, fraud, and abuse. reCAPTCHA Enterprise collects hardware and software information, such as device and application data, and sends it to Google for purposes of providing, maintaining, and improving reCAPTCHA Enterprise and for general security purposes. Your use of reCAPTCHA Enterprise is subject to Google's <u>Privacy Policy</u> and <u>Terms of Use</u>.

6. How Long We Store Your Information

Etsy will retain your information only for as long as is necessary for the purposes set out in this Policy, for as long as your account is active, or as needed to comply with our legal obligations under national applicable law. We decide how long we need information on a case-by-case basis and depending on the retention laws applicable.

The following factors typically affect the retention period:

Necessity for the provision of our Services We keep your information as long as is necessary to provide the Services to you. This includes things like maintaining and improving the performance of our Sites and Apps, keeping our Services secure, and maintaining appropriate business and financial records. Most of our retention periods are determined on the basis of this general rule.

Consent-based processing of personal data If we process personal data on the basis of consent (including consent to the extended storage), we store the data for as long as necessary in order to process it according to your consent or until you withdraw your consent.

Statutory, contractual or other similar obligations Etsy will retain and use your information to the extent necessary to comply with our legal obligations, for example, if we are required to retain your information to comply with applicable tax/revenue laws or our Know Your Customer ("KYC") obligations.

Here's what we consider when we deciding how long to keep your information:

Purpose of Processing	Retention Period
Information used to provide you with our Services	Information we use to offer you our Services is retained for the lifetime of your account.
Information used for regulatory compliance and other legal obligations	Etsy will retain and use your information to the extent necessary to comply with our legal obligations, for example, if we are required to retain your information to comply with applicable tax/revenue laws or our Know Your Customer ("KYC") obligations.
Information used for other legitimate purposes	We may retain your information for other legitimate purposes, such as to prevent harm; investigate possible violations of our House Rules and Policies; promote safety, security and integrity; or protect Etsy, including our rights, property or platform.

7. Your Rights and Choices

Certain privacy laws around the world, including the European General Data Protection Regulation (GDPR), provide users with rights and choices related to their personal information. Consistent with those laws, Etsy gives you the choice of accessing, editing, or removing certain information, as well as choices about how we contact you. In addition, subject to applicable law, you may have certain rights with respect to your personal information, such as the following:

Right to Access: You can access certain personal information associated with your
account by visiting your account privacy settings. You can request a copy of your
personal information in an easily accessible format, as well as information
explaining how that information is used. See this <u>Help Center article</u> for more
information.

- Right to Portability: You have the right to receive certain of your information which
 you provided in a structured, commonly used and machine-readable format and to
 transmit such information to another controller.
- Right to Correction: You have the right to request that we rectify any inaccurate information about you. By visiting your account settings, you can correct and change certain personal information associated with your account.
- Right to Restrict Processing: In certain cases where we process your information, you may also have the right to restrict or limit the ways in which we use your personal information.
- Right to Deletion: In certain circumstances, you have the right to request the
 deletion of your personal information, except information we are required to retain
 by law, regulation, or to protect the safety, security, rights, and integrity of Etsy.
 Please note that closing your account may not free up your email address,
 username, or shop name (if any) for reuse on a new account. See this <u>Help Center</u>
 article for more information.
- Right to Object: If we process your information based on our legitimate interests as explained above, or in the public interest, you can object to this processing in certain circumstances. In such cases, we will cease processing your information unless we have compelling legitimate grounds to continue processing or where it is needed for legal reasons.
- Right to Withdraw Consent: Where we rely on consent, you can choose to withdraw your consent to our processing of your information using, for example, an email unsubscribe link or your account privacy preferences. If you have consented to share your precise device location details with us, you can revoke that consent through the settings on your mobile device. This is without prejudice to your right to generally permanently close your account and delete your personal information. Please be aware that withdrawing consent will not affect the lawfulness of processing based on consent before its withdrawal.
- Right to File a Complaint: If you are a resident in the EEA, Switzerland or the UK, you have the right to lodge a complaint about our practices with respect to your personal information with the supervisory authority of your country or state.
- Right to File a Complaint: If you are a resident in the EEA, Switzerland or the UK, you have the right to lodge a complaint about our practices with respect to your personal information with the supervisory authority of your country or state.
 - In the UK, the relevant data protection authority is the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, +44 (0303) 123 1113, casework@ico.org.uk.
 - In Ireland, the relevant data protection authority is the Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2, D02 RD28, +353 017650100 / + 353 1800437737, email: info@dataprotection.ie or by using this online form.

Please see the United States Regional Privacy Policy for information about privacy rights provided under certain US state laws.

How to Exercise Your Rights and Choices. If you would like to manage, change, limit, or delete your personal information, you can do so via your Etsy account settings. Alternatively, you can exercise any of the rights above, subject to applicable law, through the contact options set out in <u>Section 11</u>. Once you contact us to exercise any of your rights, we will confirm receipt of your request. Limiting use of, or deleting, your personal

information may impact features and uses that rely on that information. Communication Choices. You can opt out of receiving marketing emails by using the unsubscribe link in our marketing emails or through your account settings. Certain communications from Etsy are service-related or legally required and you will continue to receive them even if you opt out of marketing emails.

8. Your Responsibilities

If you are a Seller on our Services or use <u>Etsy's API</u>, you may receive certain personal information and will have legal obligations in respect of this information. Your privacy responsibilities, including when you act as an independent data controller (someone who decides what personal data to collect and the purpose you use the data for) are laid out in the Etsy Seller Policy and the Etsy API Terms of Use.

9. Privacy Policy Changes

We may amend or update this policy from time to time. If we believe that the changes are material, we'll let you know by posting the changes through the Services and sending you an email or message about the changes. We encourage you to check back regularly and review any updates.

10. Additional Disclosures for United States Residents

In certain US states, including California, Virginia, Colorado, Utah, and Connecticut, you may be entitled to additional rights or disclosures. Please see our <u>United States Regional Privacy Policy</u>, where you can learn more about how we use your information and any additional privacy rights you may have.

11. How to Contact Us

If you have any questions:

- Contact Etsy's Support team via our Help Center
- Chat Support (available on our Site)
- Send an email to Etsy's Data Protection Officer at dpo@etsy.com
- Write to us at one of the following addresses:

In North America or South America: Etsy Support Team – Privacy Policy 117 Adams Street Brooklyn, NY 11201, USA

Outside of North America or South America: Etsy Support Team – Privacy Policy 66/67 Great Strand Street Dublin 1, Ireland