This policy was published on July 30, 2024, and will take effect on August 31, 2024. The previous version of this policy can be viewed <u>here</u>. Learn more about interest-based advertising and your choices <u>here</u>.

## **Privacy Policy**

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At Etsy, we care deeply about privacy. We strive to be transparent about what information we collect, and how we use, share, and retain it.

This Privacy 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 the Etsy companies set out at Section 11 (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 information, available here.

This policy does not apply to the practices of third parties that 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 for you to understand how we use your information. You should read this policy in full, but some key points 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 <u>Terms of Use</u> 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 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 the 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.
- Depending on your location, different Etsy entities may provide different parts of the Services to you. For more information on your relevant service provider(s) and data controller(s), along with details of how to contact them, see Section 11.
- If you have any questions about this Privacy Policy, or wish to exercise your rights, see Section 11 for further information about how to contact us. You can learn more about Etsy's policies by visiting our <a href="House Rules">House Rules</a> and <a href="Help Centre">Help Centre</a>.

### 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 in different ways and from different sources, which we have set out below. The capitalized terms in this Section 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		
You provide certain information to Etsy directly when you sign up for an Etsy account or otherwise use the 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, email address, country of residence, phone number, date of birth, taxpayer address, and Etsy shop name. For sellers established as incorporated or other form of legal entities, the name, address and date of birth of all individuals who own or control 25% or more of the entity ("beneficial owners")	
	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 Information: Regional Your country, preferred language, and currency Your name **Buyer Public Profile Information** Birthday Gender As a Buyer on Etsy, you can choose to provide Location your name and other information in connection Profile photo with your account and activity. Other people Your bio will be able to see your profile information. **Favorites and Collections** Your saved product listings that are grouped Who you follow and your followers by you ("Favorites and Collections") may Linked third-party accounts (e.g., social also be visible publicly, depending on your media, "sign-in with") settings. Product reviews Registry information (e.g., name, partner You can edit, remove, or limit this information name, wedding or special event date, through your account settings. shipping information, items on your registry) Shop name **Seller Public Profile Information** Your name Birthday As a Seller on Etsy, you must provide certain Gender information for your shop. You can also Location and/or business address (if choose to share other information (such as applicable) birthday, gender or location) in connection with Profile photo your account and activity. Other people will be Your bio, shop photos, and shop links able to see your profile information. Vacation mode announcements Linked third-party accounts (e.g., social, You can edit, remove, or limit this information "sign-in with") through your account settings. Shop policies (e.g., returns) **Seller Verification Information Selfie:** The live photo(s) of your face you take when onboarding As a Seller on Etsy, you must provide certain information where applicable to help us verify Government ID: Α copy of your your identity and prevent fraud before you can government-issued photo ID use the Services. **Biometric Data** A biometric scan of your facial geometry Where applicable, we use certain information extracted from your Government ID and from about your physical characteristics to perform your Selfie seller verification checks.

Guest Checkout Information  You can purchase items on Etsy without an account through our 'Guest Checkout' feature. We need certain information about you to facilitate your purchase.	<ul> <li>Your name</li> <li>Email address</li> <li>Billing name and address</li> <li>Credit or debit card information or other payment method</li> <li>Shipping name and address</li> </ul>
Transaction Information  When you buy or sell items on Etsy, we collect information about the order as part of your transaction history.	Information about your transactions 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, gifting)
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.	<ul> <li>Content you post in our community spaces</li> <li>Any additional information you choose to provide</li> </ul>
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.	<ul> <li>Messages Content: Content (including text and photos) you share with, or receive from, other Members through our Messages function</li> <li>Messages Metadata: Metadata about content (such as the location where a photo was taken) and Messages (such as the date and time of the message)</li> </ul>
Promotion Information  From time to time, Etsy runs promotional offers, contests and sweepstakes.	<ul> <li>In general, we collect the following information about entrants:         <ul> <li>Email address</li> <li>Social handle (if social promotion)</li> </ul> </li> <li>We'll tell you about any other data we collect in the terms of the relevant promotion, available on Our House Rules page</li> </ul>

### **Customer Support Information**

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

- Your communications with and through our support team and tools, including the automated and live chat features on our Site
- 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, and 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 and/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 and/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, how you navigate the Site (including your mouse movements, searches you make, and pages you visit) or other actions you take (such as clicking on particular parts of the Site or Apps or entering text into form fields)
- 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 collect your general location information for things like tailoring our Services to your location, to estimate shipping costs, and for security, sanctions and fraud prevention purposes. 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 collect 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 and Other Entities

We receive certain information about Buyers from third parties such as payment processors or fraud prevention partners, who help us to process transactions, provide our Services and prevent fraudulent or illegal activity.

- Your name
- Your billing address
- Your email address
- Your phone number
- Fraud prevention data such as risk-scoring

# **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 and also allows us to tailor ads for products and services that may be of interest to you.

- We may receive from our third-party partners, 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
- Demographic information, like your age, gender, household composition, estimated income, interests, and purchasing habits

### **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)
- Business partners such as shipping partners may share business information such as shipment and transaction data

#### **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 subscribes to an Etsy newsletter, a Member invites a Non-Member to visit the Site. Member uploads Non-Member а 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
- Non-Member special occasions and interests

### 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 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.

wny and how we use Your Information	
Where necessary to p	e

### **Information Categories Used**

### Where necessary to perform our contract with you

We use certain information that is necessary for us to provide you with the Services and perform our <u>Terms of Use</u> or other relevant contract(s) with you. We will need to close your account if we cannot process your information for such purposes.

# To create and maintain your Etsy account and provide our Services

We collect certain information 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 <u>Terms of Use</u>. Such partners will process your information in accordance with their own privacy policies. For more information, please see <u>Section 3</u>.

- Buyer Account Information
- Seller Account Information
- Seller Verification Information
- General Location Information
- Information from our Payment Processors
- Guest Checkout Information
- Transaction Information
- Customer Support Information

### To provide our Payments service

As an Etsy Seller, you may use our payment service, Etsy Payments, depending on your location, 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 <u>Etsy Payments</u> <u>Policy</u>.

- Seller Account Information
- Seller Verification Information

Why and How We Use Your Information	Information Categories Used	
To provide Guest Checkout  We allow Guests to purchase items from Etsy without an account through Guest Checkout.	<ul> <li>Guest Checkout Information</li> <li>Browser and Device Information</li> <li>Transaction Information</li> <li>Payment Information</li> </ul>	
To promote the safety, security and integrity of our Services		
We process certain information and apply automated processing techniques and/or manual (human) review to verify accounts and related activity, to find and address violations of our Terms of Use and applicable policies, to investigate suspicious activity, to detect, prevent and combat harmful, unsafe, or unlawful behavior, including fraud, to detect and prevent spam and security issues, and to maintain the integrity of our Service.	<ul> <li>Buyer Public Profile Information</li> <li>Seller Public Profile Information</li> <li>Buyer Account Information</li> <li>Seller Account Information</li> <li>Seller Verification Information</li> <li>Browser and Device Information</li> <li>Customer Support Information</li> <li>Information from our Payment Processors</li> <li>Messages Information</li> </ul>	
To send Service communications		
We may 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 <a href="Terms of Use">Terms of Use</a> , 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.	<ul> <li>Buyer Account Information</li> <li>Seller Account Information</li> <li>Transaction Information</li> <li>Guest Checkout Information</li> </ul>	
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), and to determine eligibility for other incentive programmes we may offer to Buyers and Sellers	<ul> <li>Promotion Information</li> <li>Buyer Account Information</li> <li>Seller Account Information</li> <li>Buyer Public Profile Information</li> <li>Seller Public Profile Information</li> </ul>	
To provide support and resolve order issues		
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). We may also use your information to resolve any cases, order issues, or dispute(s) between you and another Member.	<ul> <li>Buyer Account Information</li> <li>Seller Account Information</li> <li>Guest Checkout Information</li> <li>Transaction Information</li> <li>Service Usage Information</li> <li>General Location Information</li> <li>Customer Support Information</li> <li>Messages Information</li> </ul>	

## 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 information in certain ways. Where applicable, if you do not provide the information required by law, we will have to close your account.

Why and How We Use Your Information	Information Categories Used
To comply with local laws on selling goods  In certain countries we are required to display certain information about Sellers on Etsy, (for example as required under the Digital Services Act).	<ul> <li>Buyer Public Profile Information</li> <li>Seller Public Profile Information</li> <li>Buyer Account Information</li> <li>Seller Account information</li> </ul>
To comply with our obligations to verify Sellers  The laws of certain countries require Etsy to verify the identity of its Sellers and to take measures to prevent money laundering and/or terrorist financing on the Services. These laws include the EU Digital Services Act, the Irish Criminal Justice (Money Laundering and Terrorist Financing) Act 2010, the United States Integrity, Notification, and Fairness in Online Retail Marketplaces for Consumers Act ("INFORM") and other legal requirements.  To comply with these laws, we collect and store certain information about our Sellers. For more information on our verification processes, please see our Help Center article "How to Verify Your Identity on Etsy" accessible via https://help.etsy.com.	<ul> <li>Seller Account Information</li> <li>Seller Verification Information</li> </ul>

## To comply with other legal and regulatory obligations

Etsy may also use, access, preserve, or release your information in response to legal requests, like search warrants, court orders, production orders, regulatory requests, or subpoenas. We also may do so 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.

Examples of applicable laws that could give rise to an obligation requiring us to process and/or disclose your information include:

Civil, commercial, criminal, consumer protection, and litigation matters: where we are in receipt of an order to disclose information or a regulatory inquiry (e.g. under the Irish Competition and Consumer Protection Act 2014, the Consumer Rights Act 2022, or the Liability For Defective Products Act, 1991) or where we have a legal obligation to disclose data to a law enforcement body.

Corporate and taxation matters: to comply with our corporation and taxation obligations, such as those under the Irish Companies Act 2014, the Taxes Consolidation Act 1997, Council Directive (EU) 2021/514 ("DAC7"), 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.

The categories of information depend on the specific circumstances of each request or obligation. Only the information necessary to comply with the relevant legal obligation will be processed. Depending on the circumstances, it could include the following:

- 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

### Where necessary for our legitimate interest

We rely on our legitimate interest 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, UK, and other countries 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, and for Buyers to discover such products. We also use this information to identify and support high-performing Sellers, and for general research and aggregate reporting.	It is in our legitimate interest 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 interest to better understand our Members by logging their preferences, purchases and other interactions with us, including identifying when logged-out users may already have an Etsy account.  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.	<ul> <li>Service Usage Information</li> <li>Browser and Device Information</li> <li>Cookie Information</li> <li>Customer Support Information</li> <li>Survey Responses and Market Research</li> <li>Information from Advertising and Marketing Partners</li> <li>Analytics Information</li> <li>General Location Information</li> </ul>
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 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	It is in our legitimate interests, and those of our Members, to customize our Services, including identifying products that our Buyers would be most interested in.	<ul> <li>Service Usage Information</li> <li>Browser and Device Information</li> <li>Shop Preferences</li> <li>General Location Information</li> </ul>

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.		
To provide on-platform advertising on our Sites		
Sellers can purchase paid advertising on Etsy ("Etsy Ads"). Etsy Ads display a Seller's listings or shops more 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	It is in our legitimate interests, and those of our Sellers, to help Sellers reach the most appropriate audience for their goods.	<ul> <li>Service Usage         Information</li> <li>Browser and         Device Information</li> <li>General Location         Information</li> <li>Buyer Public Profile         Information</li> <li>Guest Checkout         Information</li> <li>Transaction         Information</li> </ul>
<u>Disclosures</u> .		
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 <a href="Etsy Offsite Ad Channels">Etsy Offsite Ad Channels</a> for further information. You may see ads for Etsy on these channels even if you have opted-out of personalized advertisements.	It is in our legitimate interests to promote the Services and listings on third-party platforms and sites.	<ul> <li>Information from         Advertising and         Marketing Partners</li> <li>Cookie Information</li> </ul>
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 <u>Terms of Use</u> .		
To facilitate campaigns, surveys and petitions  Members have the ability to sign onto campaigns, surveys, or petitions for causes they care about on our advocacy website or to donate to causes during checkout. To facilitate	It is in our legitimate interests and our Members' interests to provide these services and to conduct surveys to	<ul> <li>Seller Public Profile Information</li> <li>Seller Account Information</li> <li>Etsy Payments Information (for</li> </ul>

this, we need to collect and use certain information about our Members.	help us in improving our Services.	charitable donations)
To keep our Services safe and secure  We process 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 abuse, harassment, intellectual property infringement, crime, illegal activity, suspected fraud, harm, suspected violations of Etsy's Terms of Use or other policies 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 and to combat harmful or inappropriate conduct or content.  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, offsite transactions and illegal activities.	<ul> <li>Buyer Public Profile Information</li> <li>Seller Public Profile Information</li> <li>Buyer Account Information</li> <li>Seller Account Information</li> <li>Seller Verification Information</li> <li>Transaction Information</li> <li>Messages Information</li> <li>Service Usage Information</li> </ul>
To protect our legal rights  We may also retain, preserve, disclose, or review your 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).	It is in our legitimate interest to seek legal advice and protect ourselves (including our rights, personnel, intellectual property or platform), our Members or others, including as part of resolution process, or in respect of regulatory inquiries, litigation or any other dispute.	<ul> <li>Buyer Public Profile Information</li> <li>Seller Public Profile Information</li> <li>Buyer Account Information</li> <li>Seller Account Information</li> <li>Seller Verification Information</li> <li>Transaction Information</li> <li>Service Usage Information</li> <li>Messages Information</li> </ul>
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	It is in our legitimate interest and the interests of the general public to share information with third parties, including as part of investigations or regulatory inquiries, to	<ul> <li>Buyer Public Profile Information</li> <li>Seller Public Profile Information</li> <li>Buyer Account Information</li> <li>Seller Account Information</li> </ul>

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.	detect, investigate and prosecute illegal activity or to prevent death or imminent bodily harm.	<ul> <li>Seller Verification Information</li> <li>Transaction Information</li> <li>Messages Information</li> <li>Service Usage Information</li> </ul>
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.	<ul> <li>Buyer Public Profile Information</li> <li>Seller Public Profile Information</li> <li>Buyer Account Information</li> <li>Seller Account Information</li> </ul>
To share information with our service providers and business partners  We share certain information with our service providers and business partners, as detailed in Section 3.	It is in our legitimate interests, and those of our Members, to engage service providers and partners to assist in the provision of the Services	<ul> <li>Buyer Account Information</li> <li>Seller Account Information</li> <li>Buyer Public Profile Information</li> <li>Seller Public Profile Information</li> <li>Seller Verification Information</li> <li>Information from our Payment Processors</li> <li>Transaction Information</li> <li>Customer Support Information</li> <li>Messages Information</li> </ul>

## 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.

### To send you email marketing

In certain countries (such as those in the European Region), 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 EEA, we rely on your consent to personalize your experience on the Sites and Apps, including to help you search for and discover relevant items.

- Service Usage Information
- Browser and Device Information
- General Location Information
- Transaction Information
- Information from Advertising and Marketing Partners
- Guest Checkout Information
- Analytics 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 <a href="Facebook Custom Audience">Facebook Custom Audience</a> and <a href="Google Customer Match">Google Customer Match</a>, 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
- Information from Advertising and Marketing Partners
- Guest Checkout Information
- Analytics 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

### To verify your identity biometrically

Sellers can choose to verify their identity through biometric means. For EEA Sellers, Etsy relies on the Seller's explicit consent to collect and process their Biometric Data for identity verification purposes.

For more information on our biometric verification processes, please see here.

- Biometric Data
- Seller Verification Information

### Data used for tasks carried out in the public interest

To preserve, review, and share information to perform a task in the public interest

In limited 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 your information to help combat 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

### 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

### 3. How We Share Your Information

We share your data with third parties where necessary to provide 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. We will also display other information connected with your use of the Services, including the date you joined, information relating to items you review, photos or videos of items you purchased, your 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 indexed by search engines, including Google.

For certain Sellers, some additional information will be publicly displayed. For example, your business name, shop location, or business registration number 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, Seller Verification Information, Service Usage Information, Device and Browser Information, and Cookie Information, with our corporate affiliates, which include Etsy, Inc., Etsy Ireland UC, Etsy Payments Ireland Limited, Etsy UK, Ltd., other Etsy

entities, and Etsy owned affiliates (including Depop Ltd. and Reverb.com LLC), that help us conduct business around the world (together, the "Etsy Group Companies"). 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, fraud prevention, payment processing, customer support, business development, user account administration, and IT, technical, and engineering support.

**Sellers:** We may share aggregated information about your use of the Services to Sellers, for example, 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 or to monitor activity on the Sites and Apps, such as transaction activity. Etsy also offers services or products from 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 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 information to them.

Professional Advisors, Industry Partners, Authorities, Regulators, and other Entities: We share your information described in Section 2 with our advisors, consultants, regulators and tax authorities, law enforcement, government agencies, civil litigants, industry partners (for example, trade groups), and other entities as reasonably necessary 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</u> of <u>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 Community Policy.

**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
<ul> <li>Research companies</li> <li>Analytics providers</li> <li>Security providers</li> <li>Software service providers</li> <li>Infrastructure and technical service providers</li> <li>Professional service providers</li> <li>Customer service or other outsourced service providers</li> <li>Identity verification and fraud prevention service providers</li> </ul>	<ul> <li>Buyer Public Profile Information</li> <li>Seller Public Profile Information</li> <li>Buyer Account Information</li> <li>Seller Account Information</li> <li>Seller Verification Information</li> <li>Guest Checkout Information</li> <li>Transaction Information</li> <li>Forum/Community Information</li> <li>General Location Information</li> <li>Photos and Videos</li> <li>Customer Support Information</li> <li>Browser and Device Information</li> <li>Service Usage Information</li> <li>Survey Responses and Market Research</li> <li>Analytics Information</li> </ul>

### 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 information, may differ from those that apply in the country in which you reside. To the extent that Etsy is deemed to transfer 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," recognizing that certain countries offer a level of protection of data that is essentially equivalent to the EEA. A list of adequacy decisions is available <a href="here">here</a> via the European Commission website.

### **Standard Contractual Clauses**

Otherwise, we rely on the European Commission's Standard Contractual Clauses for the international and onward transfer of your 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 (including our <u>Terms of Use</u>), we transfer your 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 information outside of your home country, including the UK or EEA.

### 5. How We Protect Your Information

The security of your information is important to us. We protect your 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 <a href="Privacy Policy">Privacy Policy</a> and <a href="Terms of Use">Terms of Use</a>.

### 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 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 to provide our Services**

We keep your information as long as 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 your data

If we process your data on the basis of consent (including consent to the extended storage), we store the data for as long as necessary 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, Know Your Customer ("**KYC**"), and similar obligations.

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

Purpose of Processing	Retention Period
Information used to provide you with our Services	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 <b>KYC</b> , or similar 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 & Choices

Certain privacy laws around the world, including the European General Data Protection Regulation (GDPR), provide users with rights and choices related to their 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 information, such as the following:

- <u>Right to Access</u>: You can access certain information associated with your account by visiting your account privacy settings. You can request a copy of your information in an easily accessible format, as well as an explanation of 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. You can correct and change certain of your information through your account settings.
- Right to Restrict Processing: In certain cases, you may also have the right to restrict or limit the ways in which we use your information.
- Right to Deletion: In certain circumstances, you have the right to request the deletion of your 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 Help Center article for more information.
- <u>Right to Object</u>: 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 stop 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 general right to permanently close your account and delete your information. Please be aware that withdrawing consent will not affect the lawfulness of processing that happened before you withdraw your consent. 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 data protection practices 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 <u>United States Regional Privacy Policy</u> for information about your privacy rights under certain US state laws.

How to Exercise Your Rights and Choices. If you would like to manage, change, limit, correct, or delete your information, you can do so via your Etsy account settings or profile. Alternatively, you can exercise any of the rights above, subject to applicable law, through the contact options set out in Section 11. Once you contact us to exercise any of your rights, we will confirm receipt of your request. Limiting use of, or deleting, your information may impact features and services 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 if you use <u>Etsy's API</u>, you may receive certain information and will have legal obligations with respect to certain information. Your privacy responsibilities, including when you act as an independent data controller (someone who decides what data to collect and the purpose you use the data for) are laid out in the <u>Etsy Seller Policy</u> and the <u>Etsy API Terms of Use</u>.

## 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, 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. Our Relationship with You

Depending on where you live and what Services you use, different Etsy companies are responsible for your information. Details of the relevant Etsy company providing the Services are as follows:

- For the Services, including the Etsy Site and Apps (except Payments):
  - North or South America Etsy, Inc.
  - Outside of North and South America (including the EEA and UK) Etsy Ireland UC
- For Payments Services, depending on where you reside:
  - North or South America Etsy, Inc.
  - Outside of North and South America (including the EEA and UK):
    - Etsy Payments Ireland Limited For disbursements to EEA Sellers

■ Etsy Ireland UC - For disbursements to Sellers outside of North and South America and the EEA.

### 12. 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 and South America:

Etsy Support Team – Privacy Policy One Le Pole Square, Ship Street Great, Dublin 8 Ireland