CARASTA LLC PRIVACY POLICY

Version 1.02

Last Updated: February 20, 2025

Introduction

Carasta LLC ("Carasta," "we," "our," or "us") respects your privacy and is committed to protecting your personal information. This Privacy Policy describes how we collect, use, disclose, and safeguard your information when you use our mobile application, website, and other digital services (collectively, the "Digital Services").

Please read this Privacy Policy carefully. By using the Digital Services, you agree to the practices described in this Privacy Policy. If you do not agree with our policies and practices, do not use our Digital Services.

Information We Collect

Personal Information

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device ("personal information"), including:

- Identifiers (e.g., name, postal address, email address, phone number)
- Financial information (e.g., bank account information, payment card details) through our payment processor Stripe & Caramel
- Commercial information (e.g., vehicle listings, bidding history, purchase history)
- Internet activity (e.g., browsing history, search history, interaction with our Digital Services)
- Geolocation data
- Inferences drawn from other personal information

Information You Provide

- Account registration information
- Vehicle listing information
- Bidding and transaction information
- Communications with us
- User content (e.g., photos, comments, messages)

Information Automatically Collected

When you use our Digital Services, we automatically collect:

- Device information (e.g., IP address, browser type, operating system)
- Usage details (e.g., access times, pages viewed)
- Location information
- Information collected through cookies and similar technologies

How We Use Your Information

We use your information to:

- Provide and maintain our Digital Services
- Process your transactions through Caramel & Stripe
- Communicate with you
- Improve our Digital Services
- Personalize your experience
- Comply with legal obligations
- Protect against fraud and unauthorized transactions
- Send marketing communications (with your consent)

Information Sharing and Disclosure

We Share Information With:

- Caramel & Stripe for payment processing and transaction facilitation
- Service providers who assist in our operations
- Law enforcement when required by law
- Other users as necessary for auction functionality
- Professional advisors (e.g., lawyers, accountants)

We Do Not:

- Sell your personal information to third parties
- Share your information with unauthorized parties
- Use your information for purposes beyond those disclosed in this Privacy Policy

Your Privacy Rights

For All Users

You have the right to:

- Access your personal information
- Correct inaccurate information
- Request deletion of your information
- Opt-out of marketing communications

For California Residents

Under the California Consumer Privacy Act (CCPA), you have additional rights:

- Right to know what personal information we collect and disclose
- Right to delete personal information
- Right to opt-out of the sale of personal information
- Right to non-discrimination for exercising your rights

To exercise your rights, contact us at info@carasta.com.

Data Security

We implement appropriate technical and organizational security measures to protect your information. However, no method of transmission over the internet or electronic storage is 100% secure. While we strive to protect your personal information, we cannot guarantee its absolute security.

Children's Privacy

Our Digital Services are not intended for children under 13 years of age. We do not knowingly collect personal information from children under 13. If we learn we have collected personal information from a child under 13, we will delete it.

Cookies and Tracking Technologies

We use cookies and similar tracking technologies to track activity on our Digital Services and hold certain information. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent.

Third-Party Links and Services

Our Digital Services may contain links to third-party websites and services, including Caramel. This Privacy Policy does not apply to such third-party services. We recommend reviewing the privacy policies of any third-party services you access through our Digital Services.

Changes to This Privacy Policy

We may update this Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page and updating the "Last Updated" date. Your continued use of the Digital Services after such modifications constitutes your acknowledgment of the modified Privacy Policy.

International Users

Our Digital Services are operated in the United States. If you are accessing our Digital Services from outside the United States, please be aware that your information may be transferred to, stored, and processed in the United States. By using our Digital Services, you consent to this transfer.

Contact Us

If you have questions about this Privacy Policy or our privacy practices, please contact us at:

Carasta LLC [3155 Bluestem Dr S. #219, West Fargo, ND 58078, USA]

Email: info@carasta.com

Additional Information for California Residents

This section provides additional details required by the California Consumer Privacy Act (CCPA) and applies to residents of California.

Categories of Personal Information We Collect and Share

In the past 12 months, we have collected and may have shared or disclosed the following categories of personal information:

- 1. Identifiers
 - What we collect: Name, postal address, unique personal identifier, email address, account name, driver's license number, IP address
 - Business purpose: Account creation, transaction processing, communication, fraud prevention
 - Categories of recipients: Payment processors, identity verification services, service providers
- 2. Personal information under California Civil Code § 1798.80(e)
 - What we collect: Financial information, payment card details, insurance information
 - O Business purpose: Transaction processing, payment processing
 - O Categories of recipients: Payment processors, financial institutions
- 3. Protected classification characteristics
 - O What we collect: Age, driver's license status
 - O Business purpose: Legal compliance, identity verification
 - Categories of recipients: Identity verification services
- 4. Commercial information
 - O What we collect: Vehicle listings, bidding history, purchase records
 - O Business purpose: Service operation, transaction processing
 - Categories of recipients: Payment processors, other users as needed for auction functionality
- 5. Biometric information
 - What we collect: Facial recognition data for identity verification (through Caramel)

- O Business purpose: Identity verification
- Categories of recipients: Identity verification service providers
- 6. Internet activity
 - What we collect: Browsing history, search history, interaction with our Digital Services
 - O Business purpose: Service improvement, security, fraud prevention
 - Categories of recipients: Analytics providers, security service providers
- 7. Geolocation data
 - O What we collect: Physical location, IP-based location
 - O Business purpose: Service functionality, fraud prevention
 - Categories of recipients: Security service providers

Your Rights Under CCPA

As a California resident, you have the following specific rights:

- 1. Right to Know
 - Request disclosure of personal information we collect, use, disclose, and sell
 - o Request specific pieces of personal information we have collected
 - Receive this information twice in a 12-month period at no charge
- 2. Right to Delete
 - Request deletion of your personal information
 - Certain exceptions apply, such as when information is necessary for transaction completion or legal compliance
- 3. Right to Opt-Out
 - Opt-out of the sale of your personal information
 - Opt-out of sharing for cross-context behavioral advertising
- 4. Right to Correct
 - Request correction of inaccurate personal information
- 5. Right to Limit Use of Sensitive Personal Information
 - Limit the use and disclosure of sensitive personal information to specified purposes

How to Exercise Your Rights

- 1. Submit Requests
 - Online: Visit www.carasta.com/privacy-requests
 - o Email: info@carasta.com
- 2. Verification Process
 - We will verify your identity before fulfilling requests
 - You may need to provide additional information for verification
 - We will respond to verified requests within 45 days
- 3. Authorized Agents
 - O You may designate an authorized agent to submit requests on your behalf
 - Agents must provide written authorization and verify their identity
 - We may require you to verify your identity directly with us

Non-Discrimination

We will not discriminate against you for exercising your CCPA rights. This means we will not:

- Deny you goods or services
- Charge different prices or rates
- Provide a different level or quality of services
- Suggest you may receive different prices or services

Data Retention

We retain personal information for as long as necessary to fulfill the purposes described in this Privacy Policy, unless a longer retention period is required by law. The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you
- Legal obligations that require us to retain data
- Statutes of limitations
- Regulatory requirements
- Business needs

Shine the Light Law

California Civil Code Section 1798.83 permits California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please contact us through the methods listed in the Contact Us section.

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