

Privacy Policy

2nd Circuit — operated by 2nd Circuit LLC

Last Updated: July 31, 2026

1. Introduction

2nd Circuit LLC ("**2nd Circuit**," "**we**," "**us**," or "**our**") operates the 2nd Circuit website and platform (the "**Platform**"), a B2B marketplace connecting sellers of surplus and end-of-life electronics with R2-certified buyers.

This Privacy Policy explains what information we collect, how we use and share it, and the choices available to you. It applies to visitors, registered Buyers, and registered Sellers. By using the Platform, you agree to the practices described here. This Policy should be read together with our Terms of Service.

The Platform is intended for **business use** and is not directed at individual consumers acting in a personal capacity.

2. Information We Collect

2.1 Information You Provide

- **Account & business information:** name, business email, phone number, company name, business address, and role/title of the individual registering the account.
- **Buyer verification information:** R2 certification documentation, certification scope, facility location(s), and related credentialing materials submitted for our review under Section 3.2 of the Terms of Service.
- **Listing information:** inventory details, quantities, condition, location, required data-processing method, and any other details a Seller chooses to include in a listing.
- **Bid & transaction information:** bids placed, auctions won, messages exchanged with counterparties through the Platform, and, once an auction closes, the contact information exchanged between Buyer and Seller.
- **Payment information:** subscription billing details, processed by our third-party payment processor Stripe. We do not directly store full payment card numbers on our servers.
- **Communications:** information you provide when you contact us for support, sales, or other inquiries.

2.2 Information Collected Automatically

- **Usage data:** pages visited, features used, listing views, and actions taken on the Platform.
- **Device & log data:** IP address, browser type, operating system, referring URLs, and timestamps.
- **Cookies & similar technologies:** as described in Section 7.

2.3 Information From Third Parties

We may receive information from third parties to verify Buyer credentials (e.g., R2 certification bodies) or to facilitate payment processing, fraud prevention, or analytics.

3. How We Use Information

We use the information we collect to:

- Create and administer accounts, and verify Buyer R2 certification and scope;
- Operate core Platform functionality: listings, bidding, scope/geography matching, and protected-identity mechanics;
- Process subscription billing and manage plan changes;
- Communicate with you about your account, transactions, and support requests;
- Send administrative or, where you've consented, marketing communications;
- Monitor, secure, and improve the Platform, including detecting fraud, abuse, or Terms of Service violations;

- Comply with legal obligations and enforce our Terms of Service.

We do not sell your personal information to third parties for their own independent marketing purposes.

4. How We Share Information

4.1 Between Buyers and Sellers

Seller identity and contact information is withheld from Buyers throughout an auction. **Once an auction closes and a winning bid is accepted, each party's contact information is released to the other** so they can coordinate logistics, payment, and data destruction directly. This exchange is a core function of the Platform and occurs automatically upon auction close.

4.2 Service Providers

We share information with vendors who perform services on our behalf, such as payment processing Stripe/other, cloud hosting AWS, Google Analytics/other, and customer support tools. These providers are authorized to use your information only as necessary to provide services to us.

4.3 R2 Certification Verification

We may share Buyer-submitted certification information with the relevant certifying body or use third-party verification tools to confirm its validity.

4.4 Legal & Safety

We may disclose information if required by law, subpoena, or legal process, or if we believe disclosure is necessary to protect the rights, property, or safety of 2nd Circuit, our users, or the public.

4.5 Business Transfers

If we are involved in a merger, acquisition, financing, or sale of assets, information may be transferred as part of that transaction. We will provide notice before information becomes subject to a different privacy policy.

4.6 Aggregated/De-identified Data

We may share aggregated or de-identified data that cannot reasonably identify you, for analytics, benchmarking, or marketing purposes.

5. Protected Seller Identity — How It Works

Seller identity protection is a specific feature of the Platform, not just a general confidentiality practice, so we describe it separately:

- While an auction is open, Buyers see only listing details (inventory, requirements, general location/geography) — not Seller name or contact information.
- Seller identity is stored securely and is not visible to Buyers, other Sellers, or the public through the Platform interface during bidding.
- Upon a winning bid being accepted, Seller contact information is automatically released to the winning Buyer (and the Buyer's contact information is released to the Seller) to allow them to coordinate the transaction.
- Private marketplace listings are visible only to the pre-approved Buyers a Seller selects; identity protection during bidding still applies within that restricted group.

We take reasonable technical and administrative measures to protect this information, but as described in Section 9, no system is perfectly secure.

6. Data Retention

We retain account, listing, and transaction information for as long as your account is active and for a reasonable period afterward to comply with legal, accounting, or reporting obligations, resolve disputes, and enforce our agreements. Buyer certification documentation is generally retained for the duration of the account plus *[X years]* for compliance

and audit purposes. We will delete or anonymize information when it is no longer needed for these purposes, except where retention is required by law.

7. Cookies & Tracking Technologies

We use cookies and similar technologies to operate the Platform, remember preferences, and understand usage patterns through analytics tools such as Google Analytics/other. You can control cookies through your browser settings; disabling certain cookies may limit Platform functionality.

8. Your Privacy Choices & Rights

Depending on your location, you may have rights to access, correct, delete, or restrict our use of your personal information, or to opt out of certain processing (e.g., under the California Consumer Privacy Act (CCPA/CPRA), or other applicable U.S. state privacy laws). To exercise these rights, contact us at info@2circuit.com. We will verify your request and respond within the time required by applicable law.

Because the Platform is a B2B service, much of the information we process is business contact information, which is treated differently from consumer personal information under some state laws — but where an individual's personal information is involved (e.g., a named contact at a business), applicable rights still apply.

You may opt out of marketing emails at any time using the unsubscribe link included in those emails. You cannot opt out of administrative communications necessary to operate your account (e.g., billing notices, auction status updates).

9. Data Security

We implement reasonable administrative, technical, and physical safeguards designed to protect information from unauthorized access, use, or disclosure — including the access controls that support protected seller identity and scope-gated listing visibility. However, **no method of transmission or storage is 100% secure**, and we cannot guarantee absolute security.

If we become aware of a security incident affecting your personal information, we will notify you and take steps consistent with applicable law.

10. Data Location & International Use

Buyer accounts on the Platform are limited to organizations operating within the United States (see Terms of Service Section 3.2). Our servers and service providers may be located in the United States.

11. Children's Privacy

The Platform is intended for business use by adults acting on behalf of an organization and is not directed at, or intended for use by, individuals under 18. We do not knowingly collect personal information from children.

12. Third-Party Links

The Platform may contain links to third-party websites (e.g., R2 certification bodies, payment processors). We are not responsible for the privacy practices of those third parties, and we encourage you to review their privacy policies.

13. Changes to This Policy

We may update this Privacy Policy from time to time. Material changes will be posted on this page with a revised "Last Updated" date, and, where required by law, we will provide additional notice. Continued use of the Platform after changes take effect constitutes acceptance of the updated Policy.

14. Contact Us

Questions about this Privacy Policy or requests regarding your information can be sent to:

2nd Circuit LLC

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