

PRIVACY STATEMENT

Your privacy is very important to us at Arjav Diamonds NV [Schupstraat 18, Box 18, 2018Antwerp, Belgium] and our group companies, hereinafter also "we" and/or "us" and/or "Arjav Diamonds"). To better protect your privacy we provide this notice explaining our [online] information practices and the choices you can make about the way your information is collected and used. To make this notice easy to find, we make it available on our homepage and at every point where personally identifiable information may be requested. Additionally, for marketing purposes the details submitted to Arjav Diamonds and our group companies could be used in all entities in the A-Star Alliance to which we belong. A-Star Alliance entails all entities held by Arjav Diamonds NV, Aurostar DMCC and Blue Star Diamonds Pvt. Ltd. Conversely, details submitted to any of the other entities in the A-Star Alliance could be used for marketing purposes of Arjav Diamonds NV and its group companies.

1. General terms

This privacy statement informs you about how Arjav Diamonds collects and manages personal data. In order to offer our products and/or services and their functions, and to improve these products and/or services if needed, it is necessary for us to process certain personal data such as Name, Address, Email address, Phone number, etc.

This information is only collected when voluntarily submitted by you. Additionally, when you subscribe and/or order products and/or services, information required for the sale and delivery of the goods and services is processed and, as far as necessary for the handling and fulfilment of the order and ongoing provision of our services, this information can be disclosed to any of our service providers who are involved in the process.

Furthermore, all information related to the order, including your address, is gathered and processed in the interest of our own marketing purposes. We may for example send you emails to inform you of various opportunities our site has to offer or news about our products and services. This is an 'opt-in' list, which means that you can choose to receive our communication when you give us your contact details.

Finally, note that while we are offering links to other websites we are not responsible for the policies of other companies, so please review their privacy policy should you visit their websites.

2. **Contact information**

If you have any questions in relation to this privacy statement, please get in touch with us at Arjav Diamonds NV, Schupstraat 18, Box 18, 2018 Antwerp, Belgium. Phone: +32 32338090, Email: info@arjavidiamonds.com.

3. **Purpose of processing and legal grounds**

In the following paragraphs, you can read about the purposes of collecting personal data and the applicable legal grounds.

3.1 Providing our product and our services: First, it will be necessary for us to process certain personal data, for example but not limited to your identification data, financial data, company data, etc. in order to provide the products and services that you ordered or to which you subscribed, in the context of delivery of the product and/or service and billing, as well as customer support. This is therefore necessary for performance of our contract with you. If you are ordering and/or subscribing on behalf of an organisation, we have a legitimate interest in processing your data as contact details for the performance of the contract.

3.2 Customer management: In order to provide optimal customer experience, we process personal data such as, for example but not limited to, identification data, electronic identification data, email address, etc. for the purpose of customer management. We carry out this processing on the basis of our legitimate interest in knowing our customer and maintaining our relationship with you, with a view to providing a stellar customer experience.

3.3 Anti-money laundering compliance: In order to comply with our "know-your-customer" obligations under applicable Anti-Money Laundering legislation, we process personal data such as, for example but not limited to, identification data, financial data, company information, ultimate beneficial owners information, registration information, etc. We carry out this processing on the basis of our legal obligation to verify your identity before engaging a business relationship with you in accordance with the applicable legal requirements.

3.4 Product development and improvement: Naturally we strive to always improve our products and services in order to make them fit our customers' needs. For this reason, and based on our legitimate interest in doing so, we process personal data such as, for

example but not limited to, email addresses, purchases, enquiries, etc. and draw insights in relation to possible improvements.

3.5 Direct marketing: for marketing purposes we will process personal data such as, for example but not limited to, your identification data, email address, etc. and we may contact you in this regard. The legal ground for this processing is our legitimate interest in promoting our products and/or services, within the limits that are legally acceptable or your given consent where and to the extent required by law (e.g. in relation to specific kinds of electronic mail marketing).

4. Duration

We will process your data as long as necessary to provide our products and services, and beyond such time to the extent legally permitted and based on our legal obligations (e.g. in relation to invoice retention, we are legally obliged to keep invoices for 10 years) or legitimate interests (e.g. in retaining data for the purposes of responding to possible disputes or complaints or for possible reactivation of subscriptions). With respect to our obligations under the applicable anti-money laundering legislation (AML), we are required to store your identification data for 10 years as from the end of the business relationship or as from the date of an occasional transaction. As a result, not all your data will be deleted after the end of the provision of the services, but we limit our processing to what is necessary.

5. Data transfer

The personal data collected by us may be transferred to any third parties to whom Arjav Diamonds subcontracts all or part of this processing. This may for instance include IT service providers, hosting providers, affiliated companies, financial institutions, public authorities and any other relevant roles. Note that we will never sell your personal information to a third party.

In the event of transfer of personal data to a country outside of the European Economic Area, Arjav Diamonds systematically ensures the application of an adequate level of protection of such personal data by means approved by applicable data protection legislation.

Arjav Diamonds may also, pursuant to a valid legal process (such as a search warrant, subpoena, or court order), allow access to information in our possession, including personal data, in order to comply with such process and to protect our rights and property. If warranted, we may also allow access to this information in special emergencies where

physical safety is at risk. We reserve the right to disclose any personal data or other information obtained from or about you, to third parties in connection with a merger, acquisition, bankruptcy or sale of all or substantially all of our assets, to the extent that this is necessary for the process.

6. **Your rights**

Under EU data protection legislation, you may benefit from various rights as "data subject". You can exercise any of the rights listed hereunder by submitting your request by email to info@arjavidiamonds.com. Please include your personal details as well as some means of verifying your identity. Please note that we may reject requests that are excessive or a misuse of the relevant right. Furthermore, your rights may be affected by Anti-Money Laundering laws and regulations by which Arjav Diamonds is bound in the context of our legal obligation to identify you when establishing a business relationship.

6.1 Access right and data portability. You have the right to access your personal information processed by us, as well as the portability of data you have provided to us to the extent applicable.

6.2 Data accuracy: right of rectification and right to erasure. At all times, you have the possibility to request the rectification or erasure of your personal data, provided that the applicable legal requirements are met. The right to erasure is nevertheless subject to various exceptions, notably as regards personal data whose processing is necessary to support litigation or for compliance with statutory retention requirements. In such a case, however, we limit our processing to the extent possible, even without your request.

6.3 Limits to processing: right to restriction, right to object & consent withdrawal. You have the right, if applicable legal provisions are met, to object to the processing of personal data based on our legitimate interests and to otherwise obtain the restriction of certain forms of processing in specific circumstances. In particular, in relation to the processing of personal data for direct marketing purposes, you have the right to object at any time thereto. Where any processing is based on consent, you have the right to withdraw such consent at any time (without affecting the lawfulness of processing prior to the consent withdrawal). We will in each case examine your request and check whether you meet the requirements for the processing to be stopped.

6.4 Right to lodge a complaint with the supervisory authorities: you have the right to lodge a complaint with the data protection supervisory authority, notably (depending on your place of residence) the Belgian Data Protection Authority (<https://www.privacycommission.be/en/contact-us>).

7. Commitment to data security

In order to prevent unauthorized access, maintain data accuracy, and ensure the correct use of information, we have put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the information we collect online.

8. Cookies

8.1 Our website uses cookies, pixel tags and other forms of identification and local storage (together referred to as “tags/files” hereunder) to distinguish you from other users of the website and of websites of our network. This helps us provide you with a good experience when you browse the website and websites of our network and also allows us to improve our website and our services.

8.2 In many cases, these tags/files lead to the use of your device’s processing or storage capabilities. Some of these tags/files are set by Company itself, others by third parties; some only last as long as your browser session, while others can stay active on your device for a longer period of time.

8.3 These tags/files can fall into several categories: (i) those that are necessary for functionality or services that you request or for the transmission of communications

8.4 (functionality tags/files); (ii) those that we use to carry out website performance and audience metrics (analytics tags/files) and (iii) the rest (tracking across a network of other websites, advertising, etc.) (other tags/files).

8.5 Internet browsers allow you to change your cookie settings, for instance to block certain kinds of cookies or files. You can therefore block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies, you may not be able to access all or parts of the website, due to the fact that some may be functionality cookies. For further information about deleting or blocking cookies, please visit: <http://www.aboutcookies.org/Default.aspx?page=2>

8.6 Functionality and analytical tags/files do not require your consent. For analytical and other tags/files, however, we request your consent before placing them on your device. You can give your consent by allowing cookies in your browser settings, by continuing to use our website, or by clicking on the appropriate button on the banner displayed to you.

8.7 The cookies used on our website can be found here:

<http://www.arjavidiamonds.com/cookie-policy>

9. Changes to this Privacy Statement

We may update and change this privacy statement from time to time, as we may find necessary and as our site evolves and grows. While we will do our best to bring updates to your attention, it is your responsibility to keep track of such updates. Your continuing use of this site constitutes an acknowledgement of any changes in this privacy statement.