

PRIVACY POLICY

02/03/2024

This Privacy Policy applies to your use of <https://gemlaxy.com> (the "Website") and carrying out a business relationship with us. It tells you ("you", "visitors", "users") what to expect when we collect personally identifiable information about you, and what your rights are concerning the collection of your information. It is provided in accordance with our obligations under the Federal Decree Law No. 45 of 2021 on Personal Data Protection, keeping into account the provisions of the United Arab Emirates Regulation on Protection of Personal Data.

In this Privacy Policy, references to "the Company", "we", "us" or "our"we" or "us" are to WORLDWIDE DIAMOND TRADING DMCC, a Company duly registered under the laws of United Arab Emirates, with its license number DMCC-885425, and having its registered address at Unit No: 1607, DMCC Business Centre, Level No 1, Jewellery & Gemplex 3, Dubai, United Arab Emirates.

The Policy aims to ensure that users are fully aware how the Company collects and processes their Personal Data including use of the Website and any of the services and related matters. We do not knowingly collect data relating to minors and are not intended to be made available for them.

Users shall inform the Company if their Personal data changes during the relationships with us. If a user fails to do so, the Company will be forced to stop providing Services to such a user.

We reserve the right to make changes to the Policy in the future at any time. New version of the Privacy Policy comes into force since publication on the Website with notice of new date.

The present Policy is designed to elaborate on the following aspects:

- Kind of Personal Data that we collect;
- What actions we carry out with Personal Data;
- With whom we might share Personal Data;
- Period for how long we keep Personal Data;
- What rights our users have in terms of Personal Data.

The Personal Data Collected

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use,

store, share and disclose different kinds of Personal Data about users which (for purely indicative purposes) we have grouped together as follows:

- Contact information: name and surname, tel. number.
- Account information: e-mail address and password.
- Financial information: bank account numbers, bank statement, salary certificate etc. – information required to prove source of income.
- Identity verification information: images of your government issued Emirates ID, passport, national ID card or other documents requested by our compliance department, information stated in such document; address and document, proofing address (Utility bill, landline bill, bank statement, tenancy contract, etc); CV/Resume/Linkedin profile and all information in it.
- Other information, obtained during our KYC procedures, such as information about your financial state and source of funds.

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from your Personal data but is not considered Personal data in law as this data does not directly or indirectly reveal your identity.

We also collect, use and share some information automatically. When you use Website we may collect such data as your device's IP address, what pages you visited, usage information, and information collected by cookies and other similar technologies. We use information we collect automatically to administer our website and make it better for your usage and also for marketing purposes.

In case if a user either fails to provide the data requested, or provides incomplete or insufficient data, the Company may not be able to use our services, including account opening.

How Personal Data is collected

We use different methods to collect data including through:

- Account Registration. Users provide the information, which will then be collected and processed, when they fill in and submit an account application form and complete the required application steps.
- Direct Interactions. Users provide the information when they:
 - use our services;
 - discuss with us the particular services that you require;
 - pass KYC procedure in order to start business relationships with us;
 - conclude business contracts with us;
 - request and receive our services;
 - contact us with complaints or queries;
 - contact us for further information about our products and services;
 - give us feedback.

Usage of Personal Data

We collect and use Personal Data for the following actions:

- Process your transactions;
- Execute contracts;
- Provide services;
- Fulfill legal or regulatory requirements;
- Verify your identity in accordance with the applicable legislation and the Company's AML policy and KYC policy, as well as address other law enforcement needs;
- Analyze Website usage and experience in order to improve our Website;
- Respond to customer service requests and support needs;
- Conduct inquiries;
- Administer a contest, promotion, survey or other features as will be more explained on the Website;
- Carry out any other purpose or reason for which the information was collected.

Disclosure of Personal Data

- To third parties

In processing your transactions, we may share some of your Personal Data with our third-party service providers who help with our business operations and who provides us AML services. Your information will not be sold, exchanged, or shared with any third parties without your consent, except to provide services or as required by law. By using Website or services you consent to the disclosure of your Personal Data as described in this Privacy Policy.

Non-personally identifiable visitor information may be provided to third parties for marketing, advertising, or other uses. Company's third party service providers are contractually bound to protect and use such information only for the purposes for which it was disclosed, except as otherwise required or permitted by law.

We ensure that such third parties will be bound by terms no less protective those described in this Privacy Policy, or those we are subject to under applicable data protection laws.

- To legal authorities

We may share your Personal Data with law enforcement, data protection authorities, government officials, and other authorities when:

- compelled by court order, or other legal procedure;

- disclosure is necessary to report suspected illegal activity;
- disclosure is necessary to investigate violations of this Privacy Policy or any our agreement with you.

We also can disclose your Personal Information in the other circumstances only with your consent or at your instruction.

Personal Data Security

We have developed appropriate security measures to prevent your Personal Data from accidental loss, an unauthorised usage or access, alteration or disclosure. We also continuously review and, where possible, improve upon these security measures.

We also give access to your Personal Data only to those employees, agents, contractors and third parties that have a professional "need-to-know".

Personal Data Retention

We retain Personal Data for as long as necessary to fulfil purposes described in this Privacy Policy, subject to our own legal and regulatory obligations. In accordance with our record keeping obligations, we will retain Personal Data for at least five years after termination of respective agreement.

User's Rights

You have the following rights:

- the right to be informed about the fact that we're processing your Personal Data and which data exactly we are processing,
- the right to data portability;
- the right to object the processing of your Personal Data.
- the right to access your Personal Data, to correct, update, and block inaccurate and/or incorrect data;
- the right to withdraw your consent of Personal Data processing;
- the right to restrict processing;
- the right to object to processing;
- the right to lodge a complaint;

- the right to delete your Personal Data from our servers upon your justified request, where there is no compelling reason to keep using it, subject to certain exceptions (a right to be forgotten);

However, the Company might not always be able to comply with a request for deletion under legal reasons. Any processing activities that are not based on your consent will remain unaffected.

Withdrawal of consent

Users hold a right to withdraw consent to usage of their Personal Data at any time. You can withdraw your consent to usage of their Personal Data by sending us an email to privacy@gemlaxy.com with subject line “Withdrawal of consent”. In order to we be able to delete your Personal Data, please, identify yourself in such letter. We will not be able to stop processing Personal Data if we cannot identify the person who sent the relevant request.

Users have the right to withdraw their consent at any time, and such withdrawal should not impact the legality of the processing carried out before the withdrawal.

Contact us

If you have questions, requests, or concerns regarding your privacy and rights, please let us know how we can help.

privacy@gemlaxy.com