

PRIVACY STATEMENT

Your privacy is very important to us at Bellataire Group (including Bellataire BVBA and Bellataire LLC), hereinafter also "we" and/or "us" and/or "**Bellataire**". To better protect your privacy we provide this notice explaining our 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.

1. **General terms**

This privacy statement informs you about how Bellataire 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.

2. **Contact information**

If you have any questions in relation to this privacy statement, please get in touch with us at Bellataire 19 West 44th Street, NY 10036 New York, USA, email: privacy@bellataire.com or call us at *+1-212-857-7689 or +323-213-81-00*.

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 such as your name, address, VAT and/or registration ID, e-mail address,... 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 identification data 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 identification data, passports, articles of association, beneficial ownership information and shareholders chart. 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. We identify our Belgian registered diamond clients by consulting the online tool www.registereddiamondcompanies.be. The results of this identification are stored by us following the guidelines of the Client Acceptance Policy, drafted by AWDC and approved by FPS Economy.
- 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 identification data and draw insights in relation to possible improvements.

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) or legitimate interests (e.g. in retaining data for the purposes of responding to possible disputes or complaints or for possible reactivation of subscriptions). 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 Bellataire subcontracts all or part of this processing. This may for instance include IT service providers, hosting providers, 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, Bellataire systematically ensures the application of an adequate level of protection of such personal data by means approved by applicable data protection legislation.

Bellataire 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 to Bellataire, 19 West 44th Street, NY 10036 New York, USA; email: privacy@bellataire.com or call (+1-212-857-7689 or +323-213-81-00). 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 Bellataire 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. Collection with Cookies and Other Technologies

We use cookies, web beacons (including pixels and tags), web server logs and other technologies that collect certain information about you by automated means through our Online Channels, including when you visit our websites and our social media pages.

We also use Cookies to support basic website functionality and to help improve the quality of our website:

The providers of third-party apps, tools, widgets and plug-ins on our Online Channels, such as Facebook “Like” buttons, also may use automated means to collect information regarding your interactions with these features. This information is collected directly by the providers of the features and is subject to the privacy policies or notices of these providers. To the extent permitted by applicable law, Bellataire is not responsible for these providers’ information practices. **For further information** about deleting or blocking cookies, please visit: <http://www.aboutcookies.org/>

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.