

## PRIVACY POLICY

### WHO WE ARE

This website is provided by Diaman Partners Ltd, a company incorporated in Malta with company number C84652 and registered office at St. Paul Street 259, Valletta, VLT 1213 (“Diaman Partners”).

### OUR COMMITMENT

Diaman Partners is committed to protecting your personal information and other data provided to Diaman Partners via this website. If Diaman Partners requests information from which you could be identified (“**personal data**”), information of this type will only be used in accordance with this Privacy Policy. We will be the controller for your data when you purchase a product or service with us. We may also act as data processor, where you gained access to our products or services through another company.

It is important that you read this Privacy Policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements the other notices and is not intended to override them.

Diaman Partners’ products and services are not designed to appeal to or not available to, persons under the age of 18. Therefore, Diaman Partners does not knowingly attempt to solicit or receive any information from anyone under the age of 18.

### LAWFUL BASIS OF PROCESSING

Under data protection laws, Diaman Partners must have legal bases in order to process your personal data. The legal bases on which Diaman Partners may process your data are:

- **Consent:** where you have consented for us to process your personal data for one or more specific reasons
- **Performance of a contract:** in order to perform a contract we have with you
- **Legal obligation:** where processing of the data is required by law. We are also required by law to retain certain information of those that register to open an account with us and the data of customers beyond the date when they cease to be our customers
- **Legitimate interest:** in order to carry on the purposes of Diaman Partners’ business. We also have a legitimate interest in preventing fraud and money laundering and to verify identity, in order to protect our business and our customers; in order to understand how people interact with our website; to provide communication which we think will be of interest to you; to determine the effectiveness of promotional campaigns and advertising

## WHAT INFORMATION DOES DIAMAN PARTNERS COLLECT AND HOW DOES DIAMAN PARTNERS COLLECT THIS INFORMATION FROM YOU?

Diaman Partners may need to collect information about you and your computer to allow you to use some services, including:

- **Usage data:** information about how you use our website, products and services.

The information may be collected:

- **As you browse the Diaman Partners website,** including information relating to your browsing patterns and technical data about the equipment you are using to access the website is automatically collected using cookies, server logs and other similar technologies.
- **Automatically:** as you browse the Diaman Partners website certain information relating to your browsing patterns and technical data about the equipment you are using to access the website is automatically collected using cookies, server logs and other similar technologies.

## WHAT DOES DIAMAN PARTNERS DO WITH THIS INFORMATION?

Diaman Partners may use your personal data for the following purposes:

- to monitor traffic patterns and usage of the website to help to improve the website design and layout.

## RETENTION OF YOUR DATA

Diaman Partners will not retain your personal data for longer than is necessary for the purposes for which the personal data is processed. This means that your data will only be retained for as long as it is still required to provide you with services or is necessary for legal reasons. When calculating the appropriate retention period for your data Diaman Partners considers the nature and sensitivity of the data, the purposes for which Diaman Partners is processing the data and any applicable statutory retention periods. Using these criteria, Diaman Partners regularly reviews the personal data which we hold and the purposes for which it is held and processed. Our regulatory requirements mean that we are obliged to retain data for a minimum of seven years from the end of our business relationship with you.

When Diaman Partners determines that personal data can no longer be retained (or where you request Diaman Partners to delete your data in accordance with your right to do so (please see below for more information), Diaman Partners ensures that this data is securely deleted, anonymised or destroyed.

However, please note that, in some circumstances Diaman Partners may decide to retain your personal data for research or statistical purposes.

## SECURITY OF YOUR DATA

In the unlikely event of a data breach, Diaman Partners will take steps to mitigate any loss or destruction of data and, if appropriate, will notify you and any applicable authority of such a breach.

In addition to the above, where Diaman Partners has given you (or where you have chosen) a password which enables you to access certain parts of the website, you are responsible for keeping this password confidential and should not share your password with anyone. When setting a password you should make it as secure as possible and not use the same password for different purposes.

## **DATA TRANSFERS AND SHARING YOUR DATA WITH THIRD PARTIES**

Diaman Partners will not disclose your personal data to third parties other than as described in this section unless it is otherwise legally permitted or required to do so.

Diaman Partners may share your data with other members of the Diaman Partners Group.

Your personal data is protected by legal rights, which include:

- **Right to rectification:** you have the right to require us to correct any inaccuracies in your data.
- **Right to erasure:** you have the right to require us to delete your data, subject to certain legal requirements.
- **Right to restriction of processing:** you have the right to require us to restrict the way in which we process your personal data. You may wish to restrict processing if, for example:
  - You contest the accuracy of the data and wish to have it corrected;
  - You object to processing but we are required to retain the data for reasons of public interest; or
  - where you are remaining as a customer but do not wish to receive marketing communication.
- **Right to data portability:** you have the right to obtain from us easily and securely the personal data we hold on you for any purpose you see fit.
- **Right to object to processing:** you have the right to require us to stop processing your personal data should you wish the data to be retained but no longer processed. Please be aware that this may prevent us from continuing to provide services to you.
- **Right of access:** you have the right to request access to personal data that we may process about you.
- **Right to withdraw consent:** you have the right at any time to withdraw consent allowing us to process your personal data. This will not affect the legality of any processing prior to the date of such withdrawal.

If you would like to exercise any of the above rights, please:

- put your request in writing and send it to us through your usual registered channel (e.g. registered e-mail);
- specify the right you wish to exercise.

For more information or to exercise your data protection rights please, please contact us at: [info@diamanpartners.com](mailto:info@diamanpartners.com).

We will respond to requests made by you within one month.

### **CHANGES TO THE PRIVACY POLICY**

No changes to this Privacy Policy are valid or have any effect unless agreed by us in writing. We reserve the right to vary this Privacy Policy from time to time. Our updated terms will be displayed on the Diaman Partners website. It is your responsibility to check this Privacy Policy from time to time to verify such variations.

### **LINKS TO OTHER WEBSITES**

The Diaman Partners website may contain links to and from other third party websites of interest (advertisers and affiliates). However, once you leave this website, be aware that Diaman Partners does not have any control over such websites. Therefore, Diaman Partners cannot be responsible for the protection and privacy of any information which you provide whilst visiting such websites and such websites are not governed by this Privacy Policy. You should exercise caution and look at the privacy policy applicable to the website in question.

### **QUESTIONS IN RELATION TO THIS PRIVACY POLICY**

You should also be aware that you have the right to raise any concerns in relation to how we process your personal data to the Information Commissioner's Office (ICO).

We have appointed a data protection officer (DPO) who is responsible for dealing with any such concerns, in addition to overseeing questions in relation to this Privacy Policy and handling requests in relation the exercise of your legal rights. If you have any concerns, questions, or requests, please contact the DPO using the details set out below.

Our full details are:

Full name of legal entity: Diaman Partners Ltd

Email address: [info@diamanpartners.com](mailto:info@diamanpartners.com)

Postal address: St. Paul Street 259, Valletta, VLT 1213

### **COMPLAINTS**

If you believe at any time that we have not handled your data in accordance with this Policy you should contact the Data Protection Officer. You may also contact the Information Commissioner's Office (ICO) who supervise the protection of data by companies within the UK.

Last updated 23 October 2019