

eValuer DMCC - Privacy Policy

Updated: January 2024

Who we are and what we do

www.evaluer.online is a site operated by eValuer DMCC ("We" or "eValuer"). We are registered in Dubai Multi Commodities Centre ("DMCC"), United Arab Emirates ("UAE") and our registered office is at Unit 224 DMCC Business Centre, Level No. 1, Jewellery & Gemplex 3, Dubai, UAE.

We provide and operate an independent rough diamond valuation and price list platform, that deploys our purpose-built algorithm, taking sales prices from multiple sources and processing them into our proprietary 'price books' and indexes, (with monthly updates) ("Resources"), which are available via our Website. You must purchase a subscription to access the Resources on our website ("Subscription").

Application and interpretation of this Privacy Policy

This Privacy Policy provides information on eValuer's use of any personal details or data you may provide in connection with your use of the Resources, or the Website, as specified in the Online Terms and Conditions ("T&Cs").

Definitions used in this Privacy Policy, not otherwise defined herein, shall have the definitions and interpretation applied to them in the T&Cs. Some technical terms such as 'controller', 'processor', 'data subject', 'process', and 'consent' are intended to be construed in accordance with the meanings ascribed to them in the applicable data protection law.

Please be aware your use of our Website, whether or not you take a Subscription and access our Resources, constitutes your consent to, and acceptance of, this Privacy Policy.

This Privacy Policy may be subject to change from time to time. You should check our Privacy Policy regularly. Your continued use of the Website, constitutes your agreement to this Privacy Policy, as amended from time to time.

Who is in charge of your information

In respect of the personal information you give us when you take a Subscription to eValuer, or use the Website, we are the 'data controller' responsible for that information, as defined by the applicable law.

Information we collect

We may collect the following information (collectively "Data") from you:

Information you provide: Through your use of our Website, for example when registering, by completing forms, using the Resources, corresponding with us, signing up for newsletters, [participating in discussion boards or other social media functions on our Website], and/or reporting a problem with our Website you may provide us with information about you. This may include:

- your name, email address, address, phone number, and other contact details;
- information about your business or corporate organisation;
- data you input into our Resources;

- Information you provide for the purpose of purchasing a Subscription, for example your payment and billing information.

Information we collect about you: Through your use of our Website, we may automatically collect certain information. This may include:

- technical information, including the Internet protocol (“IP”) address used to connect your computer to the Internet, your Login Credentials, browser type and version, time zone, browser plug-in types and versions, operating system, and platform;
- information about your visit(s) from your IP address, including the full Uniform Resource Locators (“URL”) you clickstream to, through, and from our Website;
- information you viewed or searched for;
- page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from a particular page.

Information we receive from other sources: There may be occasions where we collect information about you through other means. These may include:

- where we work with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) we may receive information about you from them;
- personal details from other sources including where emails are forwarded to you or where we receive your contact details in an automatic out of office response to an email sent by us.

What we do with the Data we collect

We may handle or process your Data in one or more of the following ways:

- to tailor the content we make available to you;
- to ensure that any content from our Website is presented in the most effective manner for you and for your computer or other device used to access our Website;
- to deliver the Resources available on our Website, in accordance with the T&Cs;
- to provide you with any information you request from us or require to use our Website;
- to provide you with information about other goods and services we may offer that are similar to those that you already use;
- to inform you of any updates or changes to our Resources, other services, or T&Cs;
- for system administration and to report aggregated statistical information about browsing patterns and actions which does not identify any individual;
- to process payments with a third-party payment provider;
- to store usage logs which may be used by us to provide existing and potential contributors, associations we partner with, and Subscribers with company-level (not individual) information about the user base and usage patterns;
- to administer our Website effectively and for internal operations, including development, troubleshooting, data analysis, testing, research, statistical and survey purposes;
- as part of our efforts to keep our site safe and secure; and
- to comply with any obligations we may face by the laws and Regulations of the DMCC or the UAE.

We may combine Data received from other sources with information you give to us and information we collect about you. We may use this information and the combined Data for the purposes set out above.

Disclosure of your information

We may share your Data with other entities in our corporate group (for example, holding or subsidiary companies), but we will not ordinarily disclose your Data to third parties without your consent except as permitted by law or described in this Privacy Policy.

Under data protection law, we are permitted to process your Data for a number of lawful reasons. One of these reasons is referred to as 'legitimate interests', which broadly means that we are permitted to process your Data for a genuine and legitimate reason provide we are not harming any of your rights and interests. This may include, for example, to meet our obligations under the T&Cs, or to conclude a Subscription with you or to take payment from you in conjunction with a third-party payment provider. We do this on the basis that it is necessary for us to do so in order to perform the contract we are entering into with you to provide you with your Subscription or your Website access.

Additionally, we may process and/or disclose certain Data as necessary for any of the following purposes, which may not require your prior consent:

- if we are under a duty to disclose or share your Data in order to comply with a legal obligation;
- in order to enforce or apply our T&Cs;
- to protect the rights, property, or safety of eValuer, our Subscribers, or others to whom we owe a duty (this includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction);
- where we share aggregated information, which does not identify individuals with potential contributors, partners, or Subscribers;
- where we are requested to provide information by authorised third parties or regulatory or governmental agencies investigating illegal activities;
- where we believe that an emergency, illegal activity, or some other reasonable basis exists for notifying a relevant authority;
- in the event that we sell or buy any business or assets, in which case we may disclose your Data to the prospective seller or buyer of such business or assets;
- if eValuer or substantially all of its assets are acquired by a third party, Data held by us about Subscribers will be one of the transferred assets; and
- to meet our legal obligations under the laws and Regulations of the DMCC or the UAE, not otherwise specified above.

We may also share certain Data with advertisers. Save as expressly stated, we do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our Subscribers, or those who access our Website. We may also use aggregate information to help advertisers reach the kind of audience they want to target. We may make use of the personal Data we have collected from you to enable us to assist our advertisers in displaying their advertisement to that target audience.

We will take all steps reasonably necessary to ensure that your Data is treated securely and in accordance with this Privacy Policy.

How and where we store your Data

Data that we collect from you may be transferred to, and stored at, a destination outside the DMCC and/or UAE. Where we transfer Data outside the UAE (for storage or otherwise) we comply with the applicable requirements in this regard imposed by law.

Storage of your information may be conducted with third party providers with whom we hold contracts mandating standards of security and safety under applicable data protection and privacy laws.

By submitting your Data, you agree to this transfer and storage. We will take all steps reasonably necessary to ensure that your Data is treated securely and in accordance with this Privacy Policy (see further below).

Measures we take to secure your Data

We have in place appropriate technical and security measures to prevent unauthorised or unlawful access to, or accidental loss of, or destruction or damage to, your Data. This means we maintain physical, electronic, and procedural safeguards in connection with the collection and disclosure of your Data via a multi-pronged and multi-layered approach.

When we collect data through the Website, we collect Data on a secure server. We use firewalls on our servers as well as user authentication security. We store Data on a database to which no other system may connect except ours. Backups of the database are protected by Windows user security, Microsoft Office security and other security measures.

Please note that while we maintain security and safety standards in keeping with industry, legal and commercially viable levels, there is certain inherent risk in all internet-based sites which we are unable to guarantee to completely mitigate. You are strongly recommended not to send full credit or debit card details in unencrypted electronic communications with us. You are responsible for protecting against unauthorised access to your Login Credentials and to your computer.

Our security procedures mean that we may occasionally request proof of identity before we disclose Data to you.

Cookies

For our Website to work properly, you will need to ensure that your web browser is set to accept cookies. A cookie is a small file (or record in a file) which the Website can send to your browser, which may then store it on your computer or device you use to access our Website.

Among other uses, cookies allow eValuer to analyse web traffic and to determine more popular areas of our Website. They also help us to make the Website more user-friendly by allowing us to save registration and Subscription details or Login Credentials, so that you do not have to re-enter every time you visit Website.

We have set out below a description of the types of cookies we may use on our Website:

- **Session cookies.** These cookies are deleted at the end of your browser session and are used to enable you to use our Website and its features.
- **Analytics cookies.** These cookies enable us to analyse how you are using our Website and come up with strategies to make your experience better.

- **Subscriber preference cookies.** These cookies enable us to remember your Subscription (e.g. use of the Resources) preferences. To be able to do this, though, these cookies may remain on your computer even after you have quit the browser.
- **Subscriber-targeting and/or advertising cookies.** These cookies help us to show you advertisements that we think might be of interest to you. These cookies also enable us to control the number of times you view an advertisement on our Website and gauge the efficacy of advertisements we place.

You do not have to accept cookies and you should read the information that came with your web browser software to see how you can set up your web browser to notify you when you receive a cookie and to give you the opportunity to decide to accept or reject it.

We do not intend that any of our cookies will transmit information to us about you, other than concerning your use of the Website. [For more information on the cookies we use and the purposes for which we use them please see our Cookie Policy available here [COMING SOON]. Our cookies also cannot be traced back to an individual user. Once a cookie is activated, it is given an ID number, which is solely used for internal reference and cannot be used to identify the user or access any personal information, such as your name or IP address.

Keeping your information updated and accurate, and Data retention periods

When you take a Subscription with eValuer, it is your responsibility to ensure that the information you submit during this process is complete, accurate and up to date. It is your responsibility to notify us if that information changes. Unless otherwise prescribed by law, we will keep Data that you provide us when you take a Subscription for as long as you continue to be a Subscriber, for [3] years after you have ceased to be a Subscriber, and/or for [3] years after you last log into your eValuer account, after which it will be deleted.

Your rights and how to exercise them

The data protection law gives you certain rights in respect of the Data that we hold about you.

We have set some of these out below, but please note it is not a complete, exhaustive list of your rights.

- **Your right to have your information deleted in some circumstances**

In some circumstances, you have the right to require us to delete the information that we hold about you. In particular, if you cease being Subscriber and we no longer need to process your Data, then we will delete the relevant data from our systems in accordance with our data retention policy.

- **Your right to request access to the information we hold about you**

With some exceptions designed to protect the rights of others, you have the right to request access to the Data that we hold about you, as well as information about what we do with it, who we share it with and how long we will hold it for.

- **Your right to have inaccurate information about you corrected**

You have the right to have the information we hold about you corrected if it is factually inaccurate, free of charge. In most cases the easiest way to do that is to contact us at info@evaluer.online and let us know what Data needs to be changed.

- **Your right to unsubscribe**

If you receive marketing or other communications from us, you have the right to unsubscribe at any time. You can do that by following the unsubscribe link in the email, or by contacting us at info@evaluer.online. You also have the right to ask us to stop using your personal Data for direct marketing purposes.

- **Your right to complain**

You have the right to lodge a complaint with the supervisory authority if you any concerns about your data or suspect a breach.

If you wish to exercise your rights, the best way to do so is by email to our data protection officer at info@evaluer.online.