



DIAMOND TRADING NV - DATA PROTECTION POLICY (EU)

1. Preamble

This is an internal policy on data protection which stipulates how DIAMOND TRADING NV processes personal data and provides guidelines to its personnel on how to handle personal data during the performance of their tasks.

2. Context and purpose of this policy

In the context of their work for DIAMOND TRADING NV, employees may be led to store, use, modify or transmit various kinds of data.

If this data relates (directly or indirectly) to an individual who is identified or identifiable, the data will be considered personal data under European Union legislation in relation to data protection.

2.1 What is personal data?

“Personal data” is a very broad concept. It covers individuals’ names, contact information, financial information, employment history, usernames, passwords, IP addresses, purchasing habits, etc. Data can remain “personal” even if there is no name in the relevant database. A list of customer purchases with a customer ID number and no associated name is still personal data if any employee within DIAMOND TRADING NV can link the customer ID to the individual’s name. Similarly, if an employee knows a person’s age, function within a company and phone number, this employee knows various characteristics that in combination enables him/her to identify the individual.

Data concerning companies can also be personal data: for instance, a representative’s e-mail address, professional phone number and work address are personal data.

2.2 Why this policy?

Personal data is a protected form of data in several countries and jurisdictions, notably the European Union (EU). As a result, there are rules in the EU and elsewhere on what employees can do with personal data. We speak of “processing” of personal data as a way of covering any kind of (potential) use of personal data: storing, using, modifying, deleting, transmitting it, even merely giving or having access (e.g. remote access) to the data in question. In other words, everything employees do with personal data is regulated.

DIAMOND TRADING NV is therefore required to maintain a legally compliant data protection strategy that guarantees the rights of all people about whom employees are processing personal data. Failure to comply can give rise to significant fines. For this reason, DIAMOND TRADING NV as an organization wishes to ensure that all employees involved in the processing of personal data know the do’s and don’ts in relation to personal data.

2.3 How does this relate to the employee’s work?

There is a good chance that no matter their role and position, each employee processes personal data as part of their daily tasks. For instance, a sales representative will be regularly updating customer contact details or adding new customers to our databases.



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In this policy, DIAMOND TRADING NV sets out various guidelines about what employees can and cannot do with personal data. Check based on your tasks which recommendations are the most relevant, but always bear in mind the other guidance in this document.

Do's & don'ts regarding personal data

Within DIAMOND TRADING NV we must ensure that we have a privacy-minded culture that allows us to provide our services in a way that is in line with the legal requirements.

By applying the following do's and don'ts, your individual actions will help us meet this objective.

2.4 General

- DO: Apply all DIAMOND TRADING NV policies and documentation that relate to your work. If in doubt, contact your direct director.
- DO: Make others aware of DIAMOND TRADING's approach to data protection by referring to the appropriate policy or documentation. New customers and suppliers can be made aware of external policies; new personnel, the internal policies.
- DO: Check the accuracy and up-to-date nature of any personal data you process. Never assume that personal data will be up-to-date. If you become aware of any change in relation to personal data regarding yourself as an employee, or regarding any customer or supplier, please update the relevant database(s) (or request an update).
- DO: Use personal data only for permitted and foreseen purposes.

Within DIAMOND TRADING NV we collect personal data for specific purposes. This includes mainly customer data. The processing of the data will then only be permitted for those purposes (and compatible purposes).

It is important to ensure that you stay within the bounds of those permitted purposes. For new initiatives or any processing that might go beyond, see section 2.9 below.

- DO: Limit yourself to the collection and processing of only the personal data you need.

Be aware that DIAMOND TRADING NV must be able to justify its collection and processing of all personal data, and that the data minimization principle requires DIAMOND TRADING NV to limit this to only what is necessary.

Identify the kinds of personal data you actually need, and only request those (internally and externally).

- DO: If you receive any query in relation to data protection, share it immediately with your direct director unless otherwise directed.

DIAMOND TRADING NV has procedures and documentation in place to respond to the most common queries and has expert knowledge internally and externally through its advisors. Share all queries with your direct director unless there already is a specific procedure that gives you the answer to provide to the individual in question.



- DON'T: Don't share any personal data, even with colleagues, except to the extent necessary.

Treat all personal data as confidential and keep it secure. Do not allow access to personal data unless you know this is necessary, and ensure personal data is not spread further. Limit the kinds of personal data shared.

2.5 Special kinds of personal data

- DO: Check relevant procedures or contact your direct director if you are led to process any personal data regarding children, an individual's health, race, religious beliefs, criminal history (including suspicions).

Be aware that some categories of personal data are granted additional layers of protection, and must be treated with extra care.

2.6 Your devices

- DO: You should take the following measures with regard to your devices:
 - DO: Keep your passwords private and do not share them with anyone.
 - DO: Lock your devices (computer / phone / tablet/external drives...) whenever you are not using them, to protect DIAMOND TRADING NV data.

Leaving your device unlocked would allow someone else to look at your personal data but also personal data of others to which they might not have been granted access.

2.7 Contacts with suppliers / service providers

- DO: Only share personal data received from suppliers (internally and externally) after checking that you have the right to do so.

DIAMOND TRADING NV will be required to inform the individuals in question of the fact that it processes additional kinds of personal data, and can rely on the supplier's provision of this information if it has evidence of the fact that the whole information (see list in data protection legislation) has been provided.

2.8 Marketing

- DO: Ensure that you have the right to send digital commercial communications to the selected recipients including consent where needed.

Under related rules, consent is required for dispatch of e.g. newsletters or marketing campaigns to individuals (professionals or consumers) by electronic mail (e-mail, SMS, direct message on social media, etc.), except as regards the promotion to existing customers of products/services similar to those for which they are customers.

2.9 New initiatives, products or services

- DO: Check whether the contemplated processing is already covered by existing purposes and information.



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If not, further action may be required (information to the data subject, documentation regarding the purposes, etc.). Check with your direct director in this respect.

- DO: Check whether you need to carry out a (full) Data Protection Impact Assessment (DPIA).

See our DPIA tool - by using this tool, you will be able to check whether a full DPIA is required or whether you only need to provide limited information in relation to your project.

- DO: If it's a website or application, ensure the processing of personal data is covered by DIAMOND TRADING's external privacy statement.

The processing of personal data in new websites or applications might already be covered by the description in the privacy statement. If so, no specific action will be needed (except featuring a link to the privacy statement on the website or in the application).

Otherwise, the statement might need to be adapted.

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