

## PRIVACY POLICY

Ocean Diamonds Limited understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, [www.oceandiamonds.com](http://www.oceandiamonds.com) (“Our Site”) and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is requested when you agree to sign up to our email subscription list.

### **Definitions and Interpretation**

In this Policy the following terms shall have the following meanings:

“Account” means an account required to access and/or use certain areas and features of Our Site.

### **Information About Us**

Our Site is owned and operated by Ocean Diamonds Limited, a Private Limited Company registered in England under company number 05236265.

Registered address: Flat 2, Two Quays, Gweek, Helston, Cornwall, TR12 6UG

Data Protection Officer: Robert Goodden

Email address: [admin@oceandiamonds.com](mailto:admin@oceandiamonds.com)

Telephone number: 01326 218510

### **What Does This Policy Cover?**

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites.

Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

### **What Is Personal Data?**

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

### **What Are My Rights?**

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the contact details at the end of this document.
- b) The right to access the personal data we hold about you. This is outlined below.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details at the end of this document to find out more.

- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details below to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details at the end of this document.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details at the end of this document.

### **What Data Do We Collect and How?**

Depending upon your use of Our Site, we may collect and hold some or all of the personal and non-personal data set out below, using the methods also set out below. We do not collect any 'special category' or 'sensitive' personal data and personal data relating to children and data relating to criminal convictions and/or offences.

Data Collected: Email address.

How We Collect the Data: By the Email Sign Up form on Our Site.

Ocean Diamonds Limited may also collect information about your usage of our website to make a tailored website available to you. This may include technical information including the IP (Internet Protocol) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform and if you access our site by your mobile device, we may collect your unique phone identifier.

We may also collect information about your visit, including, but not limited to the full Uniform Resource Locators (URL) and query string, clickstream to, through and from our website (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain

pages, page interaction information (such as but not limited to, scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number.

Our Site uses analytics services provided by Google Analytics. Google Analytics is a web analysis service provided by Google, Inc. We use Google Analytics to monitor how visitors use our website, to compile reports and to help us improve the website. Please see Google's privacy policy for further information on the data Google collects and how it is processed. If you prefer to not have data reported by Google Analytics, you can install the Google Analytics Opt-Out Browser Add-On. You may opt out of Google's use of tracking technologies by visiting the Google advertising opt-out page.

Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling us to better understand how Our Site is used. This, in turn, enables us to improve Our Site and the products and services offered through it.

### **How Do You Use My Personal Data?**

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following describes how we will use your personal data, and our lawful basis for doing so:

Ocean Diamonds Limited may use your Personal Data as outlined in any fair processing notice in a transparent manner at the time of collection or registration where appropriate, in accordance with any preferences you express. This may include the following purposes: providing and managing your access to Our Site; registering you on Our Site; to provide goods and services to you; to provide and manage any registered account(s) that you hold with us; with your agreement, to contact you electronically about promotional offers and products and services which we think may interest you; for market research purposes to better understand your needs; personalise and tailor your experience on Our Site and our services for you; to verify your identity; communicating with you; to enable Ocean Diamonds Limited to manage customer service interactions with you; supplying you with information by email and post that you have opted-in-to (you may opt-out at any time by clicking 'Unsubscribe' at the bottom of our email communication or contacting Ocean Diamonds Limited via the email address [admin@oceandiamonds.com](mailto:admin@oceandiamonds.com).)

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email and telephone and text message and post with information, news, and offers on our products and services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. We will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

Personal data provided to us may also be profiled to help us with advertising targeting. For example, we may use your personal data to find online users with a similar profile to yourself who may be interested in our products or services.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details at the end of this document. If we need to use your personal data for a purpose that is unrelated to, or incompatible

with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

### **How Long Will You Keep My Personal Data?**

We will not keep your personal data for any longer than is necessary in light of the reasons for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

We will hold and process your data (including email address) whilst you are interacting with us and for a 24 month period after the last interaction or until you change your communication preferences.

### **Sharing your Data with Third Parties**

We will never share your data with third parties outside of Ocean Diamonds Limited for inclusion within their marketing campaigns.

Ocean Diamonds Limited may disclose your Personal Data to third parties who Ocean Diamonds Limited instruct to process that Personal Data on its behalf, particularly with regard to mail shots, marketing, market research and support services. Such third parties are required by Ocean Diamonds Limited to confirm that they apply appropriate data protection and security controls in compliance with EU General Data Protection Regulation. They agree to only use your Personal Data for the purposes Ocean Diamonds Limited instructs and to take appropriate measures to prevent unauthorised or unlawful access to it. These include marketing service providers. Our current partner for Marketing is Klaviyo. This may change over time and this policy will be updated accordingly.

### **How and Where Do You Store or Transfer My Personal Data?**

Ocean Diamonds Limited data is stored in servers based in the USA through Klaviyo. Some organisations which provide services to us may transfer data outside of the European Union (EU) but we'll only allow this if your data is adequately protected. Some of our systems are provided by US companies and whilst it is our policy that we prefer data hosting and processing to remain on EU-based solutions, it may be that using their products results in data transfer to the USA. However we only allow this when we certain it will be adequately protected. (e.g. US Privacy Shield or Standard EU contractual clauses).

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so;

### **Do You Share My Personal Data?**

We will not share without your permission any of your personal data with any third parties for any purposes, without first obtaining your consent, subject to the following exceptions.

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law.

If any personal data is transferred outside of the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation.

### **How Can I Control My Personal Data?**

In addition to your rights under the Data Protection Legislation, when you submit personal data via Our Site, you may be given options to restrict our use of your personal data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the link provided in our emails and at the point of providing your details.

You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

### **Can I Withhold Information?**

You may access certain areas of Our Site without providing any personal data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

### **How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request". All subject access requests should be made in writing and sent to the email address shown below. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal

data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

### **How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Ocean Diamonds Limited):

Email address: [admin@oceandiamonds.com](mailto:admin@oceandiamonds.com)

Telephone number: 01326 218510

### **Changes to this Privacy Policy**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date. This Privacy Policy was last updated on 5th May 2020.