#### PRIVACY POLICY

Nuvo Diamonds (hereinafter referred to as "we" or "us" or "the Company") is committed to ensuring that your privacy is protected. This privacy policy explains how we use the information we collect about you, how you can instruct us, if you prefer, to limit the use of that information and procedures that we have in place to safeguard your privacy.

## Collection of Personal Information

When you use or any of its features or participate in an online survey, we may collect a variety of information, including your name, mailing address, phone number, email address, investment risk profile, asset allocation, preferences or interests in various products and services featured on the site etc.

#### Use of Personal Information

The personal information we collect allows us to process your registration and to keep you posted on the latest product announcements, software updates, and upcoming events in relation to our services. It also helps us to improve our services, content, and advertising. If you don't want to be on our mailing list, you can opt out anytime by updating your preferences on the settings page of the Portal.

We may also want to provide you with related information from carefully selected third parties we think may be of interest to you. If you would rather not receive this information, you can opt out anytime by updating your preferences on the settings page of the Portal.

We also use personal information to help us develop, deliver, and improve our website, products, services, content, and advertising.

We may also use personal information for internal purposes such as auditing, data analysis, and research to improve our products, services, and customer communications. From time to time we may provide your information to our customer service agencies for research and analysis purposes so that we can monitor and improve the services we provide. We or our agents and sub-contractors may contact you by e-mail to ask you for your feedback and comments on our services.

From time to time, we may use your personal information to send important notices, such as communications about purchases and changes to our terms, conditions, and policies. Because this information is important to your interaction with us, you may not opt out of receiving these communications.

#### Protection of Personal Information

The Internet is not a secure medium. However, in order to protect your information, we have put in place certain security measures outlined in this Privacy Policy.

We keep your information confidential. The internal procedures of the Company cover the storage, access and disclosure of your information.

The Company takes precautions including administrative, technical, and physical measures to safeguard your personal information against loss, theft, and misuse, as well as against unauthorized access, disclosure, alteration, and destruction of the data stored on the Asset Vantage Portal.

The Site uses SSL encryption on all web pages where personal information is collected. To make use of the site, you must use a css3 and flash enabled browser such as Safari, Chrome, Firefox, or Internet Explorer. Doing so protects the confidentiality of your personal information while it is transmitted over the Internet.

When you use some of our services or applications or post on the site, the personal information you share is visible to other users and can be read, collected, or used by them. You are responsible for the personal information you choose to submit in these instances.

Retention of Personal Information

The Company will retain your personal information only for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required by law.

## Collection and Use of Non-Personal Information

We also collect non-personal information / data in a form that does not permit direct association with any specific individual. We may collect, use, transfer, and disclose non-personal information for any purpose. The following are some examples of non-personal information that we collect and how we may use it:

We may collect information regarding customer activities on the site. This information is aggregated and used to help us provide more useful information to our customers and to understand which parts of our site, products, and services are of most interest. Aggregated data is considered non-personal information for the purposes of this Privacy Policy.

If we do combine non-personal information with personal information the combined information will be treated as personal information for as long as it remains combined.

## Cookies and Other Information Gathering Technologies

site, online services, interactive applications, The email use "cookies" messages, and advertisements may and other technologies such as pixel tags and web beacons. These technologies help us better understand user behavior, tell us which parts of our website people have visited, and facilitate and measure the effectiveness of advertisements and web searches. We treat information collected by cookies and other technologies as non-personal information. However, to the extent that Internet Protocol (IP) addresses or similar identifiers are considered personal information by local law, we also treat these identifiers as personal information. Similarly, to the extent that nonpersonal information is combined with personal information, we treat the combined information as personal information for the purposes of this Privacy Policy.

We also use cookies and other technologies to remember personal information when you use our website, online services, and applications. Our goal in these cases is to make your experience more convenient and personal. For example, knowing your first name lets us welcome you the next time you visit our site

If you want to disable cookies you may do so by altering your internet browser settings accordingly. For detailed information on how to disable cookies, check with your provider to find out how to disable cookies. Please note that certain features of our website will not be available once cookies are disabled.

As is true of most websites, we gather some information automatically and store it in log files. This information includes Internet Protocol (IP) addresses, browser type and language, Internet service provider (ISP), referring and exit pages, operating system, date/time stamp, and clickstream data.

We use this information to understand and analyze trends, to administer this site, to learn about user behavior on this site, and to gather demographic information about our user base as a whole. We may use this information in our marketing and advertising services.

Pixel tags enable us to send email messages in a format customers can read, and they tell us whether mail has been opened. We may use this information to reduce or eliminate messages sent to customers.

## Service Providers

We may share personal information with companies who provide services such as information processing, extending credit, fulfilling customer orders, delivering products to you, managing and enhancing customer data, providing customer service, assessing your interest in our products and services, and conducting customer research or satisfaction surveys. These companies are obligated to protect your information.

### Others

It may be necessary by law, legal process, litigation, and/or requests from public and governmental authorities within or outside your country of residence - for us to disclose your personal information. We may also disclose information about you if we determine that for purposes of national security, law enforcement, or other issues of public importance, disclosure is necessary or appropriate.

We may also disclose information about you if we determine that disclosure is reasonably necessary to enforce our terms and conditions or protect our operations or users. Additionally, in the event of a reorganization, merger, or sale we may transfer any and all personal information we collect to the relevant third party.

### Our Companywide Commitment to Your Privacy

To make sure your personal information is secure, we communicate our privacy and security guidelines to all our employees and strictly enforce privacy safeguards within the company.

# Privacy Questions

If you have any questions or concerns about this Privacy Policy or data processing, please e-mail us at <u>sales@nuvodiamonds.com</u>.

We may update this Privacy Policy from time to time. When we change the policy in a material way, a notice will be posted on our website along with the updated Privacy Policy.

Last updated:

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