

Swedish Gem AB Privacy statement

Swedish Gem AB ("Swedish Gem", "Swedish Gem Lab", "we", "us", "our", or the "Company") is committed to protecting your privacy. This Privacy Statement describes Swedish Gem's privacy practices in relation to the use of the Company's Web sites and the related services offered by Swedish Gem (collectively, the "Services"), as well as individuals' choices regarding use, access and correction of personal information.

Swedish Gem delivers gemstones, cutting and lab services to private and public business ("Customers"). Swedish Gem's head office is located in Sweden and Swedish Gem is subject to European privacy legislation, including the General Data Protection Regulation (GDPR).

How and when does this Privacy Statement apply?

This Privacy Statement applies to business processes in Swedish Gem, Swedish Gem websites, cell phone applications and services, communities and other Swedish Gem branded websites (collectively referred to as "Swedish Gem's Websites" or "the Company's Websites"). Service specific appendices may be found in the Terms of Service, data processing agreements or equivalent information for the specific Service in question.

This Privacy Statement provides information about data processing carried out by Swedish Gem when Swedish Gem determines the purpose and means of the processing (Swedish Gem act as data controller).

Personal data is information that can identify you as a person, such as an email address, street address or phone number etc. Processing your personal data is necessary for us to serve our Customers and compliance to national company laws. Please do not use the Company's Websites or the Services if you do not agree with how we process personal data according to this Privacy Statement.

Whose personal data does Swedish Gem process?

Swedish Gem process personal data about contact persons or Service users tied to our Customers. Our statement in these regards is to be found in the data processor section below. In this Privacy Statement data subjects may also be referred to as persons or you.

Why we collect information as a data controller

Customer contacts and users of Services

To manage our Customer relations in general and to meet our Customer commitments, Swedish Gem needs information about you in your role as Customer contact person. The purposes of processing this personal data are:

- Perform deliveries in accordance with agreements made with our Customers
- Execute sales and contract process to Customers
- Provide requested offers on products and services to Customers
- Prevent abuse of our products and services
- Process orders, invoicing, payments and other financial follow-up

The legal ground for processing personal data according to the stated purposes is mainly because Swedish Gem has a legitimate interest in processing your personal data from a business perspective in a manner that we believe do not conflict with your privacy rights or freedoms.

How we collect data

Swedish Gem collects personal data without exception directly from you or other persons linked to our Customer. These persons may be a manager or colleague.

What we collect

The type of personal data Swedish Gem process about you may be:

- Basic contact details such as name, email, phone and address
- Employment information such as employer, title, position
- Financial information such as billing information

As data controller, Swedish Gem does not process sensitive personal data about you.

Sharing of information collected

Swedish Gem does not share any of the collected personal data with any third party with the only exception below.

Public Authorities

The police and other authorities may demand the handover of personal information from Swedish Gem. In these cases, Swedish Gem will only hand over the data if there is a court order, or equivalent, to do so.

How long we store your personal data

Swedish Gem may retain your information for a period of time consistent with the original purpose of collection. We will retain your information during the period of time needed for Swedish Gem to pursue our legitimate business interests, conduct audits, comply with our legal obligations, resolve disputes and enforce our agreements.

Security

We have taken a number of security measures to ensure that the personal data we keep is secure. For example, access to areas where personal data is stored is limited to our employees who require it in the course of their duties and who are informed of the importance of maintaining the security and confidentiality of the personal data we keep. We maintain appropriate safeguards and security standards to protect your personal data against unauthorized access, disclosure or misuse.

How we act as a data processor for Customers

Swedish Gem provides Services to our Customers. The Services supplies Swedish Gem's customers with cut gemstones, education and lab services. If and when we process any data on behalf of our Customers we do so in accordance with privacy regulations applicable for data processors.

Swedish Gem will not review, share, distribute, or reference any such Customer Data except as provided in Swedish Gem's General Terms and Conditions for Swedish Gem services, or as may be required by law.

Contacting us

Questions regarding this Privacy Statement or the information practices of the Company's Web sites and Services should be directed to Swedish Gem AB by contacting privacy@gemlab.se or by mailing us at:

Swedish Gem AB
Mjällerum Hökstugan
590 39 Kisa
Sweden

If you are resident of the EU, you also have the right to file a complaint with the Swedish Data Protection Authority (Datainspektionen).

Changes to this Privacy Statement

If we modify our Privacy Statement, we will post the revised statement here, with an updated revision date. We encourage you to review the Statement regularly. If we make significant changes to our Statement that materially alter our privacy practices, we may also notify you by other means, such as sending an email or posting a notice on our corporate website prior to the changes taking effect.

This Privacy Statement was last updated May 24th, 2018.