PRIVACY & COOKIE POLICY

Last updated: 21 October 2026

1. WHO WE ARE

This Privacy & Cookie Policy explains how Houssam BV ("Houssam BV", "we", "us" or "our") collects and processes personal data. Houssam BV is the controller of the personal data described in this Policy.

Houssam BV · Kernenergiestraat 19, 2610 Antwerp, Belgium · Company number / VAT: BE 1023.621.402 · Establishment unit number: 2.375.733.205 · RLE Antwerp, division Antwerp · E-mail: compliance@houssamdiamonds.com · Telephone: +32 488 88 02 66

We process personal data in accordance with Regulation (EU) 2016/679 (General Data Protection Regulation, "GDPR") and the Belgian Law of 30 July 2018 on the protection of natural persons with regard to the processing of personal data.

2. SCOPE

This Policy applies to the processing of personal data of visitors to the website www.houssamdiamonds.com (the "Website"), of persons who contact us, and of the directors, representatives, employees and ultimate beneficial owners of our prospective and existing business clients and suppliers.

3. WHICH DATA WE PROCESS, WHY, AND ON WHAT LEGAL BASIS

(a) Contact and correspondence. When you contact us, we process your name, company, position, e-mail address, telephone number and the content of your message, in order to answer your request and to manage our business relationship. Legal basis: steps taken at your request prior to entering into a contract, and our legitimate interest in conducting our business (Article 6(1)(b) and (f) GDPR).

(b) Know-Your-Customer (KYC) and anti-money laundering checks. Before and during any business relationship, we process identification data of the directors, representatives and ultimate beneficial owners of our clients and suppliers, such as name, date and place of birth, address, nationality, a copy of an identity document, extracts from official registers, and the results of sanctions and risk screening. Legal basis: compliance with our legal obligations, in particular under the Belgian Law of 18 September 2017 on the prevention of money laundering and terrorist financing (Article 6(1)(c) GDPR).

(c) Transactions. To perform our sales and purchases, we process the data required for orders, invoicing, payment, delivery, shipping, insurance and import or export formalities. Legal basis: performance of a contract and compliance with our legal obligations under accounting, tax and customs law (Article 6(1)(b) and (c) GDPR).

(d) Website use. When you visit the Website, technical data such as your IP address, browser type, device information and access logs are processed to operate and secure the Website. Legal basis: our legitimate interest in providing a secure and properly functioning Website (Article 6(1)(f) GDPR).

(e) Online accounts. Where an online ordering or trading function is made available on the Website, we process the account and log-in data of registered buyers, in order to provide that function. Legal basis: performance of a contract and compliance with our legal obligations (Article 6(1)(b) and (c) GDPR).

(f) Cookies. See Section 9.

We do not sell personal data. We do not use personal data for automated decision-making that produces legal effects for you: screening tools may support our checks, but every decision to accept or decline a business relationship is taken by a person.

4. SOURCES OF DATA

We obtain personal data directly from you, from the company you represent, and, where required for our legal obligations, from public registers (such as the Crossroads Bank for Enterprises and the UBO register), official lists of registered diamond traders, and professional screening databases.

5. RECIPIENTS

Personal data is shared only where necessary, with: service providers acting on our behalf (such as website hosting, e-mail and IT services, and KYC screening platforms), under appropriate data processing agreements; our accountant and legal advisers; banks and payment institutions; logistics and insurance providers handling shipments; the Antwerp Diamond Office and other bodies involved in import and export formalities; and competent public authorities, including supervisory, tax, customs and judicial authorities. We may disclose personal data where required to comply with applicable laws and regulations, including anti-money laundering legislation, to respond to a lawful request, order or warrant from a judicial, supervisory or other competent authority, or to establish, exercise or defend our legal rights.

6. TRANSFERS OUTSIDE THE EUROPEAN ECONOMIC AREA

Where a transaction involves a party, shipment or service provider outside the European Economic Area, personal data may be transferred outside the EEA. Such transfers take place only in accordance with the GDPR, on the basis of an adequacy decision of the European Commission, standard contractual clauses, or, where applicable, because the transfer is necessary for the performance of a contract.

7. RETENTION

We keep personal data no longer than necessary for the purposes described in this Policy: KYC and anti-money laundering records for ten (10) years after the end of the business relationship or of the occasional transaction; invoices and accounting records for the periods required by Belgian accounting and tax law; correspondence that does not lead to a business relationship for no more than three (3) years after the last contact; and technical Website data for a limited period required for security purposes. After these periods, data is deleted or anonymised.

8. SECURITY

We implement technical and organisational measures appropriate to the risks of the processing, to protect personal data against loss, misuse and unauthorised access, disclosure or alteration. Access to personal data is limited to persons who need it for the purposes described in this Policy and who are bound by confidentiality. In the event of a personal data breach, we act in accordance with the obligations laid down in the GDPR.

No method of transmission over the internet or of electronic storage is completely secure, and Houssam BV cannot guarantee absolute security. In the event of unauthorised access to, or disclosure of, personal data by a third party, such as a cyber-attack, Houssam BV shall not be liable for any resulting damage where it is not in any way responsible for the event giving rise to that damage, in accordance with Article 82(3) GDPR. This does not affect any liability that cannot be excluded or limited under applicable law.

9. COOKIES

Cookies are small text files placed on your device when you visit a website. The Website may use the following categories of cookies:

Strictly necessary cookies: required for the Website to function properly and securely, for example to remember your cookie choices. These cookies do not require your consent.

Functional cookies: remember your preferences, such as your language.

Analytical cookies: help us understand how the Website is used, so that we can improve it.

Functional and analytical cookies, and any other non-essential cookies, are placed only after you have given your prior consent through the cookie banner. You may withdraw or change your consent at any time through the cookie settings on the Website. You can also manage or delete cookies through your browser settings; disabling cookies may affect the functioning of the Website. Cookies placed by third-party services are subject to the privacy policies of those third parties.

10. YOUR RIGHTS

Subject to the conditions laid down in the GDPR, you have the right to access your personal data, to have it rectified or erased, to restrict its processing, to object to processing based on our legitimate interest, to data portability, and to withdraw your consent at any time, without affecting the lawfulness of processing carried out before its withdrawal. Certain rights may be restricted where required by law, in particular by anti-money laundering legislation.

To exercise your rights, please contact us at compliance@houssamdiamonds.com. We may ask you to verify your identity, and we will respond within one (1) month of receiving your request.

You also have the right to lodge a complaint with the Belgian Data Protection Authority (Gegevensbeschermingsautoriteit / Autorité de protection des données), Drukpersstraat 35, 1000 Brussels, Belgium, contact@apd-gba.be, www.gegevensbeschermingsautoriteit.be.

11. BUSINESS CLIENTS AND SUPPLIERS

Where a client or supplier transmits personal data to Houssam BV, such as data of its directors, representatives or ultimate beneficial owners, it shall ensure that this data has been obtained lawfully and that the persons concerned have been informed of its transfer to Houssam BV and of this Policy. Houssam BV processes such data solely for the purposes described in this Policy.

Where a client or supplier gains access to personal data processed under the responsibility of Houssam BV, it shall treat that data as strictly confidential, use it for no other purpose, apply appropriate technical and organisational measures, and inform Houssam BV without delay of any personal data breach concerning that data, while cooperating fully to remedy or limit its consequences.

12. PERSONS UNDER 18

The Website and our services are intended exclusively for businesses. We do not knowingly collect personal data of persons under the age of eighteen (18).

13. THIRD-PARTY WEBSITES

The Website may contain links to websites operated by third parties. Houssam BV is not responsible for the content or the privacy practices of such websites, which are governed by their own policies.

14. CHANGES TO THIS POLICY

Houssam BV may amend this Policy at any time. The version published on the Website applies, and the date of the latest update is stated at the top of this Policy.

15. GOVERNING LAW

This Policy is governed by Belgian law. The courts of Antwerp, Belgium, shall have exclusive jurisdiction, without prejudice to your right to lodge a complaint with the Belgian Data Protection Authority and to any mandatory rules of jurisdiction.