

MyBroker.diamonds App - Privacy Policy

Last updated: October 23, 2022

About MyBroker.diamonds

GEMPAIR Ltd is the proprietary owner of a certain unique and proprietary platform known as "MyBroker.diamonds" (the "**Platform**") which is utilized as a mobile application for connecting businesses within the diamond industry, especially between diamond brokers and diamond traders.

Who are we?

GEMPAIR Ltd is the developer and operator of the Platform (all, the "**Platform**").

What is this Privacy Policy about?

We have created this Privacy Policy because we highly evaluate your Personal Data and information. Please read it, as it includes important information in respect of your Personal Data and information.

For any questions or concerns, please contact us via our email address :
brokerdiamondapp@gmail.com

Consent:

By using the the Platform or allowing someone else to use it on your behalf, you give your consent to our collection, use, disclosure, transfer and storage of any Personal Data and information received by us as a result of such use, in accordance with this Privacy Policy.

Which Information do we collect?

1. Personal Data:
 - a. Full name
 - b. Email address
 - c. Phone number
 - d. Photo (and access to your phone camera – optional)
2. Non-Personal Data:
 - a. Location (country, geographic location)
 - b. How you use the Platform

What use do we do of your Information?

1. Personal Data

Any Personal Data we collect is being used in a way that is consistent with this Privacy Policy, and may be used as follows:

- a. Access and Use: Any Personal Data provided to us by you in order to obtain access to any functionality of the Platform may be used by us in order to provide you with access to the required functionality and to monitor your use of such functionality.
 - b. Company's Business Purposes: Any Personal Data provided to us by you may be used by us in order to help us improve the functionality of the Platform, to better understand our users, to protect against, identify or address wrongdoing, to enforce our Terms of Use, and to generally manage the Platform and our business.
 - c. A Specific Reason: Any Personal Data provided to us by you for a specific reason may be used by us in connection with that specific reason.
 - d. Marketing: Any Personal Data provided to us by you may be used by us to contact you in the future for our marketing and advertising purposes, including without limitation to inform you about new services or Platforms we believe might be of interest to you, and to develop promotional or marketing materials and provide those materials to you.
 - e. Statistics: Any Personal Data provided to us by you may be used by us for statistic reports containing aggregated information.
2. Non-Personal Data
Since Non-Personal Data cannot be used to identify you in person, we may use such data in any way permitted by law.

Which Information do we share with Third Parties?

1. Personal Data
We have no intention of selling your Personal Data to any other third party. However, naturally there are circumstances in which we may disclose, share or transfer your Personal Data, without a further notice, as follows:
 - a. Required by Law – If we believe in good faith that disclosure is required by law, including but not limited to, orders by any governmental entity, court or any other judicial entity, in any jurisdiction.
 - b. To Prevent Wrongdoing – If we believe in good faith that disclosure is required in order to prevent any kind of illegal activity, fraud or civil wrong.
 - c. Business Purposes: As we develop our business, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, dissolution or similar event, Personal Data may be part of the transferred assets. You acknowledge and agree that any successor to or acquirer of GEMPAIR Ltd (or its assets) will continue to have the right to use your Personal Data and information in accordance with the terms of this Privacy Policy.
 - d. Statistics – We may disclose statistic reports containing aggregated information, based on your Personal Data, which may be transferred to third parties in order to promote our business.

2. Non-Personal Data

Since Non-Personal Data cannot be used to identify you in person, we may disclose such data in any way permitted by law.

Links to Other Web Sites

The Platform may contain links to other websites and/or third-party services. We are not responsible for the privacy policies of such websites and/or services, and we advise you to review their privacy policies.

Storage and Security

We are strongly committed to protecting your Personal Data and information, and we will take reasonable technical steps, which are commercially reasonable and accepted in our industry, to keep your Information secured and protect it from loss, misuse or alteration. However, if you notice a risk or any security violations, we advise you to report to us on brokerdiamondapp@gmail.com, so we can resolve it as soon as possible.

Other Terms

1. Changes to This Privacy Policy

The Platform and our business may change from time to time. As a result, at times it may be necessary for us to make changes to this Privacy Policy. We reserve the right, in our sole discretion, to update or modify this Privacy Policy at any time (collectively, "**Modifications**"). Modifications to this Privacy Policy will be displayed by the "Last Updated" date at the top of this Privacy Policy. Please review this Privacy Policy periodically, and especially before you provide any Personal Data or information. This Privacy Policy was last updated on the date indicated above. Your continued use of the Services following the effectiveness of any Modifications to this Privacy Policy constitutes acceptance of those Modifications. If any Modification to this Privacy Policy is not acceptable to you, your sole remedy is to cease accessing, browsing and otherwise using the Platform.

2. Direct Messages

- a. We may send you, from time to time, information regarding its services, including advertisements, via short messages or emails.
- b. By using the Platform, including providing your phone number or email address, you explicitly consent to receive such messages. However, at any time you may inform us of your removing such consent, by sending proper email to: brokerdiamondapp@gmail.com.
We may, however, send direct messages we believe are critical for your use of the platform, even following your choice to unsubscribe.

3. Cookies

- a. We may use Cookies for the proper and continuous operation of the Platform or website, including collection of statistics, verifications, modifications etc.
- b. Modern browsers allow you to avoid such use of Cookies. If you don't know how to do that, check the help files of your browser.

4. Third Party's Advertisements

- a. As part of the services, some third party's advertisements may appear on the Platform or website. Such advertisements provided by an external supplier which adapt content according to the user's habits.
- b. Such third-party services may use Cookies. It is hereby clarified that such services are subject to the third party's privacy policy and not to this document.

5. Rights of Affected Person

You shall have the right to demand that your Personal Data be removed, corrected, transferred to you and deliver further requests to us regarding your Personal Data, by sending proper email to: brokerdiamondapp@gmail.com

6. Dispute Resolution

The laws of the State of Israel shall govern this Privacy Policy. Any dispute which may arise in connection with this Privacy Policy shall be brought to the competent court in the Tel-Aviv district, Israel, which shall be granted exclusive jurisdiction.