

Dear Website User / Customer,

K P Sanghvi & Sons and its subsidiaries and affiliates (collectively, "KP Sanghvi", "KPS", "KP", "we", "us" or "our") respect your privacy and take seriously the issue of safeguarding your privacy online. KP wants you to fully understand its privacy practices. Please read the following privacy policy (this "Privacy Policy") which applies to the web site located at [www.kpsanghvi.com](http://www.kpsanghvi.com) and all of KPS's associated web sites linked to [www.kpsanghvi.com](http://www.kpsanghvi.com) by KPS as well as the services accessible therefrom (collectively, the "Site" or the "Web Site"). The purpose of this Privacy Policy is to inform you about the types of information KPS gathers about you when you visit the Site, how KPS may use that information, what choices you have regarding KPS's use of your information and how you may access information you provide to KPS.

YOUR USE, VIEWING OR ACCESSING OF THE SITE IN ANY MANNER WILL CONSTITUTE YOUR ACCEPTANCE OF THIS PRIVACY POLICY AND THE PRACTICES AND TERMS AND CONDITIONS DESCRIBED HEREIN. IF YOU DO NOT AGREE WITH OR ACCEPT THIS PRIVACY POLICY OR ANY OF THE TERMS AND CONDITIONS CONTAINED HEREIN OR ANY POSTED GUIDELINES OR RULES, PLEASE DO NOT USE THE SITE. KPS RESERVES THE RIGHT TO CHANGE OR REVISE THIS PRIVACY POLICY AT ANY TIME BY POSTING CHANGES, REVISIONS OR A NEW PRIVACY POLICY. YOU CAN ACCESS KPS's PRIVACY POLICY AT ANY TIME AT [www.kpsanghvi.com](http://www.kpsanghvi.com). YOUR CONTINUED USE OF THE SITE WILL CONSTITUTE YOUR ACCEPTANCE OF ANY CHANGES OR REVISIONS TO, AND ANY REPLACEMENT OF, KPS's PRIVACY POLICY.

When a revision is made to this Privacy Policy, KPS will revise the "last updated" date on this page. We encourage you to periodically review this Privacy Policy. For other terms and conditions that apply to your use of the Web Site, please read the Terms of Use posted on the site.

Information We Collect and Use:

## PERSONALLY IDENTIFIABLE INFORMATION

The Site is primarily a business to business web site. Hence you can use the Site only after disclosing who you are or revealing required personally identifiable information about yourself (and the business entity you represent) and after the same has been validated by our internal approval process. Personally identifiable information means any information that may be used to identify you as an individual or a company, including, but not restricted to, a first, last or business name; office, billing or other physical address; an e-mail address; phone number or other contact information; When submitting personally identifiable information to us, you represent to us that the information is true, accurate

and current in all respects, and you are automatically giving us your unconditional consent to the collection, storage, use and disclosure of your personal information as set forth in this Privacy Policy. You shall be responsible to forthwith inform us of change in your personal information as provided by you to us. At various locations on the Site, such as when you contact us, register to use the Site, log-in to a password protected area, place an online order etc., we may request or provide you with the option to supply us with certain personally identifiable information. As part of creating an account on the Site, you may also be requested to provide questions and secret answers, which we use to help verify your identity and assist in resetting your password. If you do not want your personally identifiable information collected, please do not submit it to us. Please keep in mind that if you do not submit personally identifiable information that is requested of you, you may be unable to access certain locations and features on the Site. When you provide us with personally identifiable information, we may use that information to better understand your needs and for the purpose of operating and improving the Site and our service offerings, programs and your user experience. We may also use that information to contact you, for example, to answer a question or respond to a comment you have submitted. Whenever you provide KPS with personally identifiable information, KPS may use this information to send out communications to you about itself and its products and services, including but not restricted to information of new promotions, surveys, contests, sweepstakes or product or service updates. KPS may also use your personally identifiable information to improve and customize the Web Site's content, layout, products and services. Additionally, if you contact one of our diamond and jewelry offices (and provide personally identifiable information to the office) or submit a request or inquiry through our Web Site, KPS will use your personally identifiable information to respond to your request or inquiry and to update you with any other information that we believe may be of your interest. Whenever you place an order with KPS, we may use your personally identifiable information to confirm your order, to help prevent and detect abuse or fraud, respond to your requests or inquiries and update you with any other necessary information regarding your order that we think would be helpful or interesting to you.

## CHILDREN'S PERSONAL INFORMATION

The Site is intended for adult users eighteen (18) years of age or over only. KPS does not knowingly collect or maintain personal information from children under the age of thirteen (13) or send them requests for personal information. If KPS learns that personally identifiable information of persons under thirteen (13) years of age has been collected on the Site, KPS will take the appropriate steps to delete that information.

## NON-PERSONALLY IDENTIFIABLE INFORMATION



In some cases, when you visit the Site, we may also collect information that is non-personally identifiable information or technical information that, by itself, cannot be used to identify or contact you. Examples of this type of information include the type of Internet browser or computer operating system you use, demographic information (e.g., your age, gender or zip code), the date and time you visited the Site, the pages you accessed, the name of the web site from which you linked to the Site, country or residence and other anonymous data. We also may ask for additional information which you have the option not to provide. We may use non-personally identifiable information to analyze trends, to gather broad demographic information for aggregate use and for marketing and promotional purposes. Non-personally identifiable information is not linked to any personally identifiable information. In order to improve the Site, we reserve the right to use or disclose non-personal information in any way we see fit.

## THIRD-PARTY SERVICE PROVIDERS AND WEB SITES

We may share your personally identifiable information with third party partners, agents, representatives and contractors (including but not restricted to, shipping & forwarding companies, webhosting companies, credit card processing companies, logistics companies, jewelers, assemblers, data analysis firms, affiliates, third party consulting or marketing firms and e-mail service providers). However, we are not responsible for the privacy practices of other web sites or third parties. We provide third-parties with your personally identifiable information only to the extent necessary to complete the requested service, product or transaction. In addition, the Site may contain links to other web sites and to third party service providers. When you use certain features or functions of the Site, your Internet browser may automatically be directed and opened to a third party web site and/or your information may be furnished to a third party service provider for processing and storage. Please be aware that unless explicitly stated on the Site, we are not responsible for the privacy practices of other web sites or third party service providers. We encourage you to be aware when you leave the Site and to read the privacy statements of other web sites, including every web site that collects personally identifiable information. This Privacy Policy applies solely to information collected by the Site and does not cover information collected elsewhere.

## FOR KPS'S INTERNAL USE

We may review your personally identifiable information for accuracy and errors/ omissions (if any) but are not obliged to do so. Your personally identifiable information may be used to conduct internal research on Site users' interests, behavior, demographics, and also for

better understanding and improvement of effectiveness, performance and usability of the Site and our promotional programs. Further, we may use this information internally to improve the Web Site content, product offerings and marketing and promotional initiatives.

## LEGAL COMPLIANCE AND FRAUD PROTECTION

Without limitation of any other provisions of this Privacy Policy, we may collect and share any information, including personal information, at our sole discretion, to comply with all applicable laws, regulations, legal process or governmental requests, or in order to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person or as otherwise required by law. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction. We reserve the right to release information contained within our access logs concerning any user of the Site when that user is in violation of our Terms of Use or other published guidelines or partakes (or is reasonably suspected of partaking) in any illegal activity. We also reserve the right to report any suspected illegal activity to law enforcement for investigation or prosecution.

## CUSTOMER FEEDBACK/REFERRALS

If at any time you provide feedback to KPS or participate in any promotional activities, we may post your feedback / responses on the Web Site. All such feedback / responses shall on submission by you become the sole property of KPS and we shall be entitled to use it in any manner whatsoever. However, we will remove your personal information contained in the feedback / response from our Web Site if you send a request via e-mail to [sales@kpsanghvi.com](mailto:sales@kpsanghvi.com). If you refer one of our products to your business associate, or when you e-mail a product to your business associate, through our Web Site, you and your business associate's names and e-mail addresses will be required to ensure that your business associate knows that you have requested KPS to send them the e-mail. In connection with such a referral, you and your business associate's e-mail addresses will only be used for this purpose unless permission is otherwise granted.

## TRANSFER OF INFORMATION

Information collected on this Web Site may be stored and processed in any country in which KPS or its agents maintain facilities and by using this Web Site, you authorize KPS to make any such transfer of your personal and non-personal information for storage and processing outside of your country. As part of any merger, sale of company assets or acquisition, as well as in the event of insolvency, bankruptcy or receivership, personal and

non-personal information may be transferred as one of the business assets of KPS. You grant your express consent for KPS's transfer of your personal and non-personal information in any such business transaction. If local laws applicable to you require you to provide express consent in a particular form for a transfer as contemplated herein, at the request of KPS, you shall provide the same at no cost to KPS.

## DATA COLLECTION TOOLS

In addition to the information specified above, KPS may collect information about your use of the Site through electronic communications protocols and cookies. As with most web sites you visit, KPS may automatically receive personal information from you as part of the communication connection itself, which often consists of network routing information (where you came from), equipment information (Internet browser type) and date and time. KPS may also use cookies, embedded URLs and embedded pixels to capture additional information.

## IP ADDRESS

KPS collects and you consent to the collection of your IP address whenever you visit the Web Site, to help diagnose performance of its servers, administer and tune the operation of the Web Site, gather demographic information for aggregate use, and track the date, duration of each session within the Web Site, analyze trends, and track traffic patterns. Your IP address may also be used in combination with your personally identifiable information for credit card fraud protection and risk reduction.

## ELECTRONIC COMMUNICATIONS PROTOCOLS AND COOKIES

KPS may collect and you consent to the collection of non-personally identifiable information through cookies, web logs, web beacons (also known as action tags) and other monitoring tools. This non-personally identifiable information may be used for better understanding and improving the usability, performance and effectiveness of the Web Site and marketing initiatives. We may share or transfer non-personally identifiable information with or to our affiliates, licensees and partners. Third parties may use cookies, KPS's web log files, web beacons and other monitoring technologies to compile, aggregate statistics on KPS's behalf.

## COOKIES

"Cookies" are pieces of data or text files that are sent by a web server that are saved by your internet browser and stored on your computer. Use of cookies is industry standard and information contained in cookies will enhance your experience on the Site. Cookies are used to analyze web page flow, evaluate promotions, deliver you a personalized shopping experience, track visits from our partners / affiliates and allow the use of our shopping cart. Cookies contain information that can later be read by a web server in the domain that issued the cookie to you. KPS does not use cookies to collect or store any personal information, but they may be tied to the personal information you knowingly choose to provide to us. We may use two types of cookies - session cookies and persistent cookies - to enable us to collect aggregate information on the usage patterns of the Site, such as what areas of the Site are visited most often, so that we can tailor the Site to user preferences. Session cookies exist only for as long as your Internet browser remains open. When the session ends, the Internet browser is closed and the cookies go away. Persistent cookies, in contrast, last from visit to visit. Persistent cookies are saved on a visitor's computer by the Internet browser and do not go away when you exit your Internet browser. You have control over cookies. Most Internet browsers can be set to refuse to accept cookies, although this may affect your Internet experience, including your use of the Site. You can also erase cookies that are already on your computer, block all cookies or receive a warning before a cookie is stored. Please refer to your Internet browser instructions or "help" screen to learn more about these functions. If you choose to have your Internet browser refuse cookies, the Site may not function properly for you.

## EMBEDDED PIXELS/WEB BEACONS

The Web Site's pages may also contain embedded electronic images or pixel technologies, commonly referred to as web beacons. These web beacons allow KPS to track the number of users who have visited the Web Site's pages and may also be used to assist in delivering cookies on the Web Site. In addition, we may also include beacons in our e-mail messages in order to track whether the message has been opened or acted upon.

## EMBEDDED URL<sub>s</sub>

KPS may also use a tracking technique that employs embedded URLs to allow use of the Site without cookies. Embedded URLs allow limited information to follow you as you navigate the Site, but is not associated with personal information and is not used beyond the session.

## THIRD PARTY ADVERTISING AND CONTENT DELIVERY



KPS may also use third-party advertising or content delivery companies to serve ads or images on the Web Site. These third-parties may use web beacons to save a cookie on your computer. This allows the third party to recognize your computer each time you visit the Web Site or e-mails, and to compile anonymous information.

## SECURITY

KPS is committed to the protection of the personal information that you share with us. We utilize a combination of security technologies, procedures and organizational measures to help protect your personal information from unauthorized access, use or disclosure. Certain personally identifiable information that you submit to us may, however, not be encrypted during transmission, and with respect to such information KPS restricts access to such information to those employees who need access to the information in order to do their jobs. However, it is not possible to guarantee the security or integrity of information disclosed online because no data transmission over the Internet is completely secure. Any e-mail or other communication requesting your password, asking you to provide sensitive account information via email, should be treated as unauthorized and suspicious and should be reported to KPS immediately. If a password is used to help protect your accounts and personal information, it is your responsibility to keep your password confidential. If you do share your KPS password with a third party for any reason, the third party will have access to your account and your personal information, and you may be responsible for actions taken using your password. If you believe someone else has obtained access to your password, please contact us immediately. If you are sharing a computer with anyone, we suggest you log out before leaving the Site in order to protect subsequent users from gaining access to your information. We urge you to take every precaution to protect your personal data when you are on the Internet. Because no physical or electronic security is impenetrable, you recognize the inherent risk in the use of internet or such other data storage and transmission networks in collection, storage, access and transfer of information. By using the Site or emailing information to us, you agree to assume all risk in connection with the information sent to us or collected by us when using the Site.

## HOW TO CONTACT US

If you have any questions or suggestions regarding this Privacy Policy, or if you have submitted personally identifiable information through the Site and would like access to such information or to have that information corrected, please send an e-mail to your relationship manager at KPS or the KPS customer service department at [sales@kpsanghvi.com](mailto:sales@kpsanghvi.com) or send a written request to: GW 7011/12, G Block, Bharat Diamond



Bourse, Bandra-Kurla Complex, Bandra (E), Mumbai, 400051, India.

## CHANGING YOUR INFORMATION

If you would like to revise any of the personal information that you have provided to KPS while registering or using the Web Site, please send an e-mail to your relationship manager at KPS or to our customer service department at [sales@kpsanghvi.com](mailto:sales@kpsanghvi.com) and we will correct or update it after due verifications.

## SUBSCRIBE/UNSUBSCRIBE

We want to communicate with you only if you wish to hear from us. There may be times when you will have the opportunity to subscribe to an e-mail list or electronic newsletter that will send information about the Site. You have the ability to change your preferences and opt-out of receiving such communications. To opt-out of receiving communications from KPS: (1) select "unsubscribe" on our subscription status page and enter the requested information; (2) make your request by contacting your relationship manager at KPS or by sending an e-mail to our customer service department at [sales@kpsanghvi.com](mailto:sales@kpsanghvi.com).; (3) Click the "unsubscribe" link which is included at the bottom of our e-mail communications and hit send; or (4) Contact us via the e-mail address that is specified in the e-mail communication. If you are contacting us by e-mail to unsubscribe, please insert "UNSUBSCRIBE" in the e-mail subject line and the body. If you unsubscribe, we will process your request as soon as reasonably practicable, but in no event longer than ten days.

## GOVERNING LAW AND JURISDICTION

All matters relating to this Privacy Policy and your access to, and use of, the Site shall be governed by and construed in accordance with the laws of India, applicable to agreements made and to be entirely performed within India, without resort to its conflict of law provisions. You agree that the Courts of Mumbai alone and no other courts shall have the jurisdiction to entertain and try any action at law or in equity arising out of or relating to this Privacy Policy and/or the Site, which shall be filed only in the courts located in India and you hereby irrevocably and unconditionally consent and submit to the exclusive jurisdiction of such courts over any suit, action or proceeding arising out of this Privacy Policy and/or your use of the Site.