

## Privacy Policy

Diamond & Skillen respect your privacy. Diamond & Skillen is committed to the safe and secure processing of personal data and compliance with applicable data protection law. We have implemented appropriate technical and organizational measures to protect your personal data against loss or unlawful access. The number of persons with access to your personal data is limited. Only individuals associated with Diamond & Skillen that need to process your personal data in accordance with the purposes below will have access to your personal data.

The following describes how we process your personal data.

### How we process your personal data

Fulfilling our contractual obligations towards your company, for example sending quotes, order administration, provision of products and services to your company, invoicing your company, responding to your service requests, etc.

How do we obtain your personal data	We obtain personal data from you when you register on our Websites, fill in any forms on our websites, furnish our representatives with your business card, or when we obtain your data from representatives of your company.
Categories of personal data we process	Personal master data (key personal data); Contact data; Key contract data (Contractual/Legal Relationships, Contractual or Product Interest); Network and device identification.
The purposes of the processing	Fulfilling our contractual obligations towards your company, e.g., sending quotes, order administration, provision of products and services to your company, invoicing your company, responding to your service requests etc.
Legal basis for the processing	It is within the legitimate interest of Diamond & Skillen and your company to process your personal data for the above noted purposes. We use your personal data for fulfilling our contractual obligations towards your company. The privacy impact of the processing is low, as Diamond & Skillen contacts you in your professional capacity.

Recipients (or categories of recipients) of the personal data	We will share your personal data with suppliers and business partners and legal agents which carry out services on our behalf such as printers who deliver marketing collateral Diamond & Skillen produce on your behalf.
Retention period	We will retain your data for as long as the business relationship with your company exists and for as long as your employment with your company subsists. We will retain and use your data during the applicable statutory limitation periods and as necessary to comply with our legal obligations, resolve disputes and to enforce agreements.

### Marketing/Prospecting:

How we have obtained your personal data	You provided your personal data through the use of our Websites (eg. registration form completion allowing the placement of cookies). We may have received your personal data when you supplied us with your business card, or we may have obtained your personal data from your company. Personal data may also be obtained from third party data augmentation services. You may have provided us with personal data over the telephone. If you have registered to attend an event with a third party provider, then we may obtain your personal data from that third party provider, where you have given your consent to such third party provider to supply your personal data to us.
Categories of personal data we process	Personal master data (key personal data); Contact data; Key contract data (Contractual/Legal Relationships, Contractual or Product Interest); Network and device identification.
The purposes of the processing	Informing you via any means (including via email, telephone, text message, social media, post, or in person) about our products, services, publications and events which we think may be of interest to you and your company, based on previous purchases and interest shown in Diamond & Skillen's products and services.

Legal basis for the processing	Unless we explicitly request your consent to process your personal data, we rely on Diamond & Skillen and your company's legitimate interest to send you relevant marketing communications. The privacy impact of the processing of your personal data is low, as Diamond & Skillen contacts you in your professional capacity. You can opt out of processing for direct marketing purposes by clicking on the "Unsubscribe" link situated within any marketing emails sent to you. You also have the right to object to the processing at any time by contacting Email: <a href="mailto:nigel@diamondskillen.com">nigel@diamondskillen.com</a> . Where you withdraw your consent or unsubscribe (as applicable), we will retain certain personal data (only to the extent that it is absolutely required) on our "do not contact" list.
Recipients (or categories of recipients) of the personal data	We will also share your personal data with suppliers and business partners and legal agents that carry out services on our behalf such as marketing solution providers.
Retention period	We will process your personal data unless you opt out of the processing for direct marketing purposes.

## Customers Testimonials, Comments and Reviews:

How we have obtained your personal data	We obtain your personal data through the completion of a release document which is available in hard copy and is also available online.
Categories of personal data we process	Contact details, job role and key personal data
The purposes of the processing	The processing is required for the purpose of providing reviews to our client base in support or otherwise, of our products, services and software.
Legal basis for the processing	We have obtained your prior, informed consent to the processing.
Recipients (or categories of recipients) of the personal data	Individuals who access any marketing channel from either within Diamond & Skillen or outside of Diamond & Skillen.
Retention period	For as long as is necessary unless you withdraw your consent to the processing.

\*\*Where Diamond & Skillen has sought your consent to the processing of your personal data then you can withdraw your consent at any time by contacting Email: [nigel@diamondskillen.com](mailto:nigel@diamondskillen.com).

### Transfer of your Personal Data to third countries

Your personal data may be transferred to a country outside of EU/EEA (limited to the [Privacy Shield framework](#)) which offer similar level of protection as within the EU/EEA. The transfer is based on the legal basis outlined in How we process your personal data and is for the purpose outlined in How we process your personal data. The transfer to these countries is based on the adequacy decision of the European Commission.

### What are your rights?

You are entitled to know what personal data we are processing about you. You have the right to request access to your personal data and you can request that we provide a copy of such data to you. You are entitled to have incorrect personal data regarding you corrected, and in some cases you may request that we delete your personal data.

You also have the right to object to certain processing of your personal data, and request that the processing of your personal data be limited. Limitation or deletion of your personal data may result in Diamond & Skillen not being able to fulfil its commitments to you. You also have the right to request data portability, where your personal data would be extracted in a machine-readable format and transferred to another controller. Diamond & Skillen may not always be obliged to comply with a request from you for deletion, restriction, objection or data

portability. Additional circumstances such as exercising the right of freedom of expression and information, compliance with a legal obligation which requires processing by EU or Member State law or processing for establishment, exercise or defence of legal claims can justify further processing by Diamond & Skillen. Diamond & Skillen will assess the eligibility of your request and inform you about Diamond & Skillen's decision and reasoning. Where you have given us your consent to process your personal data, you can withdraw your consent at any time and without justification. Where you withdraw your consent, certain personal data (only to the extent that it is absolutely required), will be retained on our "do not contact" list.

If you have questions regarding how we process Personal Data concerning you, you are most welcome to contact us at Email: [nigel@diamondskillen.com](mailto:nigel@diamondskillen.com).

### Objections and complaints

If you have any objections or complaints with the way in which we process your personal data, you have the right to lodge a complaint with the relevant data protection supervisory authority, where the applicable laws provide for such remedy.

Identity of the Diamond & Skillen Privacy Officer  
Diamond & Skillen Privacy Officer: Nigel Skillen

The Diamond & Skillen Privacy Officer can be contacted at:  
Email: [nigel@diamondskillen.com](mailto:nigel@diamondskillen.com)

### Information Regarding Cookies

#### 1) Cookies and similar technologies

A cookie is a small text file which is placed onto your computer or electronic device when you access our website. Similar technologies include web beacons, action tags, local shared objects ('flash cookies') and single-pixel gifs. Such technologies can be used to track users' actions and activities, and to store information about them. We use these cookies and/or similar technologies on this website for the following purposes:

At Diamond & Skillen we keep track of user activity through services such as Google Analytics, Hotjar and Sharpspring

#### 2) Information collected

We may obtain information about your computer or any other electronic device which you use to access our website, such as your IP address, your browser and/or other internet log information. We will treat this information as your personal information.

In certain circumstances we may also collect personal information about you but only where you voluntarily provide it (e.g by completing an online form) or where you purchase goods or services from us.

#### 3) Consent for cookies

In most cases we will need your consent in order to use cookies on this website. The exception is where the cookie is essential in order for us to provide you with a service you have requested, or essential to the inherent functionality of the website (e.g to enable you to store items in a shopping basket and/or to use our check-out process).

Where we wish to use cookies that require your consent you will be asked whether you consent to the use of cookies in the following manner:

On the first occasion a pop-up will ask the user to consent by clicking a button. This preference will then be stored for the future.

Thereafter you will be provided with an opportunity to opt-out of the use of cookies which can be done in the following manner:

#### 4) Third-party cookies

We work with third party suppliers who may also set cookies on our website. These cookies and their third party owners, are included in the table below. By consenting to the use of cookies on our site you will be consenting to the use of these cookies. These cookies may be used to collect the following information:

E.g. Your IP address and time of visit;

The fact that you have visited our website;

Your name and facebook profile.

#### 5) Cookies and similar technologies used on this website

The following cookies/similar technologies are used on this website:

Third Party Cookies:

### **Google Cookies**

1P\_JAR - Google cookie. These cookies are used to collect website statistics and track conversion rates.

APSID - Used by Google to store user preferences and information.

HSID - Used by Google together with the SID cookie to keep your account secure by blocking attempts to steal content from forms that you complete on the Diamond & Skillen website.

NID - These cookies are used by Google to store user preferences and information while viewing the pages with Google maps on them.

SAPISID - Used by Google to store user preferences and information.

SID - Used by Google to keep your account secure by blocking attempts to steal content from forms that you complete on the Diamond & Skillen website.

SIDCC - Used by Google as a security cookie to protect users data from unauthorised access.

SSID - Used by Google to store user preferences and information.

PREF - Used by Google to remember information on your preferences regarding the look and feel of the Diamond & Skillen website.

### **Google Analytics Cookies**

\_ga - Collects Google Analytics data and identifies unique users.

\_gat - Used by Google Analytics to throttle the request rate.

\_gid - Collect Google Analytics data and distinguishes users.

\_utma - Collected by Google Analytics, this helps keep track of the number of times a user has been to the site, when their first visit was, and when their last visit was.

\_utmb - Collected by Google Analytics, this helps determine how long a user's visit was by collecting a timestamp of the moment in time when the user enters the site.

\_utmc - Collected by Google Analytics, this cookie helps determine how long a visit takes by collecting a timestamp of the moment in time when the user leaves the site. It stays for 30 minutes for another page view to happen, and if it doesn't, it expires.

\_utmz - Collected by Google Analytics, this keeps track of where a user comes from, what search engine was used, what link was clicked on, what keywords were used, and where in the world the site was accessed from.

### **Hotjar Cookies**

\_hjIncludedInSample - Used by Hotjar. This session cookie is set to let Hotjar know whether that visitor is included in the sample which is used to generate funnels.

### **Sharpspring Cookies**

Koik - This cookie is used by Sharpspring to manage session data.

\_\_ss - This cookie is a session cookie. It is used to handle the SharpSpring session and allow multiple site visits to be grouped in the same event in the life of the lead.

\_\_ss\_referrer - This cookie captures the user's referral location for use in SharpSpring.

\_\_ss\_tk - This cookie is the unique tracking device. It allows browser visits to be tied to the lead with the same cookie regardless of session and referrer.

Un - This cookie identifies your session in Sharpspring.

sid - Sharpspring session cookie.

### **Diamond & Skillen Cookies**

Pum-425 - This cookie tells the browser that you have opened a popup on the Diamond & Skillen website.

Pum-389 - This cookie tells the browser that you have opened a popup on the Diamond & Skillen website.

Viewed\_cookie\_policy - This cookies tells the browser that you have accepted cookies on the Diamond & Skillen website.

6) How to turn off cookies

You can set your browser not to accept cookies and the websites below tell you how to remove cookies from your browser. However, some of our website features may not function as a result.

For further information on cookies generally visit [aboutcookies.org](https://aboutcookies.org) or the Information Commissioner's webpage on cookies <https://ico.org.uk/your-data-matters/online/cookies/>

### Links to Other Websites

Our Website includes links to other Websites whose privacy practices may differ from those described in this Privacy Policy. If you submit personal information to any of those third party Websites, your information is governed by their privacy policies. We encourage you to carefully read the Privacy Policy of any Website you visit.

### Social Media Widgets

Our Website includes social media features, such as the "Facebook" button, and widgets, such as the "Share This" button or interactive mini-programs that run on our Website. These features and widgets may collect your IP address, which page(s) you are visiting on our Website, and may set a cookie to enable the feature or widget to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our Website. Your interactions with these features and widgets are governed by the privacy policy of the company providing it.

This Privacy Policy was last amended on April 11th, 2019.