



## **Qual Diamond Privacy Policy**

Last Updated: July 9th, 2020

In this Privacy Policy (this “Policy”), Qual Diamond Hi-Tech Corporation [and our affiliates] (“Qual Diamond, “we”, “us”), explain how we collect, use, and share personal information in the general course of our business.

More specifically, this Policy applies to personal information we collect through [qualdiamond.com](http://qualdiamond.com) and through our other corporate websites and purchasing platforms that link to this Policy (collectively, our “Website”), information we collect while attending or exhibiting at trade shows, as well as personal information we otherwise collect in operating our business, such as when we engage with a potential customer, vendor, consultant or other third party in the operation of our business generally.

If you have any questions regarding this Policy, you may contact us at the information in the “How to Contact Us” section below.

### **HOW WE COLLECT PERSONAL INFORMATION**

**We collect information that you give us.** Typically this is contact information for you and your company or employer that we collect directly from you, such as when you request information about our services via our Website, or provide us your contact information as a billing or vendor contact. In such instances, you generally decide how much information to share with us, but not providing this information may prevent us from fulfilling your request or otherwise performing the activity for which the information is collected.

### **Payment Card Information**

You may choose to pay for our products using a payment card. In such case, payment card information is submitted by the purchaser to the third party PCI/DSS-compliant payment processing service we use for this purpose and we do not, ourselves, process or store the card information. The processing of that payment information is governed by the policies of the

payment processing service. If you have questions about the processing service we use, see the “How to Contact Us” section below.]

**We collect information automatically.** By visiting and interacting with our Website, we collect certain technical data by automated means such as your IP address, browser type and version, and operating system, as further described below.

In most cases, this technical information is collected automatically through our web server logs or is collected through various tracking technologies, which may include “cookies,” and “web beacons.” You can read about how we use cookies and other tracking technologies in the section below titled “Cookies.”

**Information from other sources:** We may obtain information about you from other sources. For example, your employer may provide us with your contact information as your employer’s billing contact.

## **PERSONAL INFORMATION WE COLLECT**

We generally collect contact information (such as a person’s name, company or employer name, email address, mailing address, and phone number). This contact information is typically business contact information as we generally offer and provide our products to businesses, not to individuals. We may also request and collect other information such as general information about your employer’s potential needs as they relate to the products we provide.

As described above, we also collect technical data automatically when you visit our Website such as your IP address, browser type and version, the operating system of your device, information about your activity on the Website including the date and time you access the Website and similar web server log information. Some of this information could be used to identify you or be associated with you.

## **THE PURPOSE OF OUR COLLECTION AND PROCESSING OF PERSONAL INFORMATION**

We use your personal information to operate our business including to market our products to you and businesses associated with you and to otherwise support our interactions with you and others with whom we interact. Here are more specific examples of how we use your personal information:

§ To fulfill the purpose for which you provided the information. For example, if you provide your name and contact information to find out additional information about us or to purchase one of our products, we will use that information to fulfill that request or purchase;

§ To receive, process, and respond to your specific inquiries and requests as well as monitor and improve our handling of inquiries and requests;

- § To deliver information about our company and services to you and others with whom we interact;
- § For analysis to develop and improve our business, products, Website, and marketing and advertising efforts;
- § To process payments and transactions;
- § To perform accounting, auditing, billing, reconciliation, collection, and similar administrative activities;
- § To help maintain the safety, security, and integrity of our Website and our networks, databases, other technology assets, and our business;
- § To prevent, detect, identify, investigate, respond to, and protect against potential or actual claims, liabilities, prohibited behavior, fraud, and criminal activity;
- § To respond to law enforcement requests, to comply with and enforce applicable legal requirements, agreements, and policies, and to enforce our rights;
- § To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred;
- § For purposes described to you in other privacy notices we present to you when collecting your personal information; and
- § To perform other activities consistent with this Policy.

## **SHARING YOUR PERSONAL INFORMATION**

We do not sell or rent your personal information, nor do we share it with unaffiliated third parties for their own marketing use. Generally, we share personal information to facilitate the operation of our business including the advertising or promotion of our products, to facilitate changes to or transfers of our business, as required by law, or with your consent.

Here are some examples of where we share personal information:

- [Within Qual Diamond's group of affiliated companies (e.g. parent, subsidiaries) consistent with this Policy.]
- With our contracted service providers who perform services for us such as cloud infrastructure, data storage, communications, and technical services, marketing and relations

management services, investigations and accounting services, customer support, and bill collection services.

- With legal, governmental, or judicial authorities, as instructed or required by those authorities or applicable laws, or in relation to a legal activity, such as in response to a subpoena or investigating suspected illicit activity. We reserve the right to report to law enforcement agencies activities that we in good faith believe to be illegal.
- In connection with, or during negotiations of, an acquisition, merger, asset sale, or other similar business transfer that involves substantially all of our assets or functions where personal information is transferred or shared as part of the business assets.

## **Cookies**

Cookies are small files that are stored on your device when you visit a website. We use cookies to do a number of things such as [remember your preferences, record what you have put in your shopping cart, allow you to log into your member profile, and analyze your web page visits and activity to help us improve our offerings and target our advertising based on your inferred interests]. Cookies do not themselves store information that identifies you, but they are often used in a manner that they can be associated with you.

Here are the types of cookies you will encounter in using our website:

§ Strictly necessary - these are required by our Website to perform certain functions such as allowing you to [log in to your member profile or make online purchases];

§ Functional – these help to improve your experience by doing things like [remembering products you've added to your shopping cart or remembering certain preferences you have set];

§ Analytic – these are used to analyze, in an aggregated manner, the way our website is used so that we can improve the website and our offerings. [We use Google Analytics for this purpose]; and

§ [Advertising – these cookies record browsing activity on our website and others as well as links and advertisements you have clicked. They are set by third party advertising networks we use and their purpose is to allow delivery of our advertisements to you on other websites based on your inferred interests as indicated by the information they record. They also may be used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign.]

Most internet browser settings will allow you to accept, reject, delete and otherwise manage cookies. You can find more information about this at [www.allaboutcookies.org](http://www.allaboutcookies.org). You can also avoid receiving cookies by browsing our website using your browser's anonymous usage setting (called "incognito" in Chrome and "private browsing" in Firefox and Safari). Blocking our strictly necessary cookies will prevent certain functions of our website from working properly or at all. In

addition to managing Google Analytics by managing its cookies, you can deactivate Google Analytics by using a browser plug-in found [here](#).

## **SECURITY**

No information can be completely protected from unauthorized access, use or loss, particularly information that is emailed or otherwise transmitted over the Internet. However, we endeavor to maintain reasonable and appropriate security measures to protect your personal information from loss, misuse, and unauthorized access, disclosure, alteration, and destruction.

## **choices regarding your PERSONAL INFORMATION**

You can avoid our collection and use of your manually submitted personal information by not providing it to us. You may opt out of marketing communications at any time by contacting us at the information in the “How to Contact Us” section below.

[You can also unsubscribe from our newsletter and other email marketing communications by following the instructions or unsubscribe mechanism in the e-mail message.] Note, if you choose to opt out of marketing communications, we may still communicate with you regarding non-marketing transactional or administrative related purposes.

## **CHILDREN’S INFORMATION**

Our products and Website are not intended for or directed to children under the age of 18 and we do not knowingly collect information from children. If you believe we have collected information of a child, you can notify us at the information below.

## **THIRD-PARTY SITES**

This Policy does not apply to, nor are we responsible for, the privacy, information or other practices of any third parties, including any third party operating any site or service to which the Website links. [Additionally, we may integrate with third party e-commerce platforms to facilitate the sales of our products. Use of such third party platforms is subject to the platforms’ privacy policy.] The inclusion of a third party link or platform on or through the Website does not imply our endorsement of the linked site or service or their privacy practices.

## **HOW TO CONTACT US**

You may contact us about matters pertaining to this Policy at the following:

By Email: [privacy@qualdiamond.com]

By Mail: [Attn: Privacy at Qual Diamond  
Qual Diamond Hi-Tech Corporation  
9823 Pacific Heights Blvd Suite A  
San Diego, CA 92121]

By Phone: [(858) 263-4358]

## **AMENDMENTS**

We reserve the right to change, modify, add or remove portions of this Policy from time to time and in our sole discretion, but will alert you that changes have been made by indicating on this Policy the date it was last updated. When you visit this Website or provide us your personal information under circumstances covered by this Policy, your personal information will be processed in accordance with the then current version of this Policy as posted on the Website. We recommend that you revisit this Policy on occasion to learn of any changes.