



PROTECTION OF PERSONAL INFORMATION ACT, 2013 (ACT 4 OF 2013) POPIA POLICY

Company Name: LDE Diamond Traders cc T/A Grand Diamonds
Registration Number: 2010/048126/23
Assessment Date: 21/04/2026
Information Officer: Leandro Eckhardt

1. Purpose

LDE Diamond Traders cc T/A Grand Diamonds (“the Company”) is committed to protecting the privacy and security of personal information in accordance with the Protection of Personal Information Act, 2013 (“POPIA”).

This policy sets out how personal information is collected, processed, stored and protected in the course of the Company’s business activities, including website enquiries, appointment-based sales, bespoke jewellery design and manufacturing trade services.

2. Scope

This policy applies to:

- Customers (retail and trade)
- Website visitors
- Supplier and service providers
- Employees and contractors
- Any third party whose personal information is processed by the Company.

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3. Types of Personal Information Processed

The Company may process, inter alia:

- Names and Contact details
- Identity numbers and copies of identity documents
- Physical and postal addresses
- Payment and transaction information
- Bespoke design specifications linked to individuals
- Correspondence and appointment records
- Images or CAD renders linked to custom commissions

Where required, additional information is collected to comply with the FIC Act.

4. Lawful Basis for Processing

The Company processes information lawfully and in accordance with the Protection of Personal Information Act, 2013 (“POPIA”)

Personal Information is processed on one of more of the following lawful grounds:

- Where processing is necessary to conclude or perform a contract with a customer, supplier, employee or service provider;
- Where processing is required by law, including obligations arising from the Financial Intelligence Centre Act, Tax Legislation and other applicable regulatory requirements;
- Where processing is necessary for the legitimate business interests of the Company; provided such processing does not infringe the rights of the data subject; and
- Where the data subject has provided voluntary, specific and informed consent, where consent is required.

Where personal information is processed to comply with a legal or regulatory obligation, consent is not required and may not be withdrawn.

The Company does not process personal information in a manner that is unlawful, excessive or unrelated to its business activities.

5. Use of Personal Information

Personal Information is used to:

- Facilitate jewellery design, manufacture, sales and delivery
- Schedule and manage appointments
- Process payments and invoicing
- Comply with anti-money laundering legislation
- Communicate with customers and trade partners
- Fulfil legal and regulatory obligations

6. Sharing of Information

Information may be shared with:

- Courier and logistics providers
- Payment processors
- Professional advisors (auditors, legal advisors, compliance)
- Regulatory bodies such as Financial Intelligence Centre (FIC) when required by law

The Company does not sell personal information to third parties.

7. Information Security

The Company implements reasonable technical and organisational safeguards, including:

- Access control and password protection
- Secure storage of physical and electronic records
- Staff confidentiality obligations
- Restriction of personal data access on a need-to-know basis

8. Data Retention

Personal information is retained only for as long as necessary:

- To fulfil contractual obligations
- To comply with statutory retention requirements, including FIC Act requirements
- For legitimate business purposes

Where retention is required by law, POPIA deletion rights do not apply.

9. Data Subject Rights

Data Subject may request:

- Access to personal information
- Correction of inaccurate information
- Deletion where legally permissible
- Objection to processing in limited circumstances

Requests must be submitted in writing and may be declined where retention is required by law.

Contact Details

All POPIA-related enquiries should be directed to:

Information Officer: Leandro Eckhardt
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