

PRIVACY POLICY

Last updated: September 12, 2023

Stornoway Diamonds Inc. ("Stornoway", "we", "us", "our") is committed to taking the necessary measures to comply with the principles and requirements for the protection of privacy and personal information under applicable privacy legislation. This Privacy Policy (the "Privacy Policy") applies to the services offered by Stornoway and its affiliates under the domain and sub-domains of www.stornowaydiamonds.com (the "Website").

Your privacy is our primary concern. Our goal is to ensure the confidentiality and security of the personal information you provide to us and to protect this information in accordance with applicable privacy laws. This Privacy Policy explains our privacy and security practices. In this Privacy Policy, personal information refers to information that can identify an individual, either directly or indirectly.

By continuing to browse our Website, you are accepting and consenting to the practices described in this Privacy Policy and our [Terms and Conditions](#) . If you do not agree with these practices, we ask that you not use our Website.

Personal Information Collected and Purposes

As part of our activities, we may collect personal information from you. We only collect personal information that is necessary to provide you with our various services. Wherever possible, we indicate both mandatory and optional fields.

We collect personal information about you:

- when you contact us (by e-mail, telephone, mail, through our inquiry function or in person). We may collect your name, e-mail address, home address and telephone number. This information enables us to provide the information or services requested and to communicate with you regarding your request;
- when you use our job application feature on our Website. We will collect your name, e-mail address and any other information you provide, including your employment history. We use this information to evaluate and respond to your application;
- when you visit our Website, we automatically collect information about you using cookies. Cookies are pieces of information sent to your computer or other similar device you use to access the internet, such as a smartphone, tablet or other mobile device, when you visit a website, which store and sometimes track information about your use of the Website. For more information, please see Cookies and IP Addresses below;
- when you complete the site access form as a supplier, we will collect your name, e-mail address, date of birth, telephone number, credentials and driver's licence. We use this information to validate your eligibility to access the mine site and to ensure your safety and that of all company employees.

Generally, your personal information will be collected directly from you. We may, however, collect personal information from third parties to the extent permitted by law.

We may also collect personal information in order to comply with applicable legal and regulatory requirements, or for other purposes permitted by law. We do not collect personal information for any other purpose, except with the consent of the individual concerned.

How is your personal information used or disclosed?

We use or disclose personal information only to the extent reasonably necessary to facilitate the purposes listed above. We may share your information with our affiliates when required to fulfill these purposes.

In some cases, we may share personal information with third-party service providers performing functions on our behalf, including providers of information technology and analytical or marketing services.

We may also disclose your information as part of a business transaction, in connection with the financing, securitization, insurance, sales, assignment or any other proposed or effective disposition in whole or in part of Stornoway, or its business or assets, for the purposes of evaluating and/or executing the proposed transaction. Assignees or successors of Stornoway, or its business or assets, may use and disclose your personal information for purposes similar to those described in this Privacy Policy.

Finally, your information may be disclosed as necessary to satisfy legal, regulatory, or other insurance, audit and security requirements, and otherwise with your consent, or as permitted or required by law (including as required by Canadian and foreign laws applicable to us or our service providers). Accordingly, in response to a verified request from law enforcement or government officials regarding a criminal investigation or suspected illegal activity, we may (and you authorize us to) disclose your name, city, province, telephone number, e-mail address and order history without a court order.

We do not sell, rent or trade your personal information to third parties. Your personal information is distributed without your consent only to the extent permitted or required by law.

Security and Retention of Your Personal Information

We will maintain the confidentiality of your information and it will only be used in accordance with this Privacy Policy or applicable laws. Our internal practices help protect your privacy by limiting employee access to and use of customer information.

We have implemented reasonable security measures to protect against theft, loss, misuse or alteration of your personal information, such as implementing firewalls and encryption technologies, as well as restricting access to personal information to only those employees who actually need access. However, it is important to note that any information transmitted over the Internet can be intercepted by a third party. Consequently, we cannot and will not assume responsibility for the theft, loss, misuse or alteration of any personal information transmitted over the Internet.

We retain personal information for as long as necessary to fulfill the purposes for which it was collected, or for legal or commercial purposes. When your personal information is no longer

required, we destroy or anonymize your personal information for future use in accordance with applicable laws.

Hosting and Transfer of Personal Information

We will store personal information on our internal servers or with service providers. Your personal information may be hosted and/or processed outside of Quebec. Our service providers may host and process personal information outside of Quebec and Canada. Please note that privacy laws in these jurisdictions differ from Canada and Quebec privacy laws. However, we ensure that our service providers comply with all applicable privacy laws and implement contractual clauses imposing obligations on them. For more information about our information processing abroad, please contact our Privacy Officer (contact details provided below).

Cookies and IP Addresses

Visitors to our Website should also be aware that anonymous technical information may be collected during their visit. This information may include the visitor's IP address, browser and operating system type, domain name, access times, and reference website addresses. We use this information to identify an individual, collect general demographic information about Website users, diagnose problems with our systems and administer the Website.

We will not attempt to link or match such anonymous technical information with personally identifiable information, unless we (or our service providers) have obtained your consent or in accordance with applicable laws.

Note that we use analytics service providers such as Google Analytics. Please refer to these service providers' websites for more information about their privacy practices (e.g. you can find more information about Google's data collection, use and processing practices here: <http://www.google.com/policies/privacy/partners/>). This information is used to target advertisements and content that may be of interest to you, as well as to provide statistical information through features such as Google Analytics, Google Ads, Facebook pixel and LinkedIn pixel.

Many web browsers allow you to manage your preferences. You can set your browser to refuse cookies and other tracking technologies. In some cases, tracking tools used by third-party service providers may be disabled. For example, Google allows you to disable cookies intended to target ads by accessing the [opt-out page](#) on its main site. Google Analytics can also be disabled by downloading the browser add-on available for this purpose. You can also opt out of the use of cookies by other third-party providers by logging into the [Network Advertising Initiative's](#) consumer opt-out page.

Third-Party Websites

Our Website may contain links to other third-party websites that may collect personal information. The Privacy Policy does not include the privacy practices of these third parties (or the absence thereof). We cannot and will not take responsibility for the policies, practices and actions of these third parties.

What are your rights in relation to your personal information?

When you provide us with your personal information and/or use our services, you consent to the collection, use and disclosure of your personal information by Stornoway.

You have the right to view, review, modify and correct your personal information collected by us. To view, verify, correct or update your personal information, we invite you to contact our Privacy Officer using the contact information provided at the end of the Privacy Policy. We may not accept a request to access or amend information if we believe that such a request would violate a law or legal requirement, or would result in incorrect information in our records.

Before we give you access to your information, provide you with the personal information we hold about you or to make the requested changes, we may ask you for information to help us confirm your identity as well as your right to access this information.

You may withhold or withdraw your consent to the collection, use and disclosure of your personal information, or request the deletion of the personal information we hold about you, at any time upon reasonable notice and subject to any legal or contractual requirements. However, if consent is withheld or withdrawn, we may not be able to provide certain services. We will explain the consequences of deleting your information or withdrawing your consent once your request has been received, in order to assist you in your decision.

Effective Date and Modification

This Privacy Policy, as amended from time to time, was adopted by Stornoway on the last updated date indicated above. We reserve the right to modify our Privacy Policy at any time. If we intend to use or disclose personal information for purposes materially different from those described in the Privacy Policy, we will make reasonable efforts to notify you, including by posting the revised Policy on our Website. By continuing to provide personal information or use our Website after any changes to the Privacy Policy, you agree to such changes.

Contact Us

If you have any questions or concerns about this Privacy Policy or would like to make a complaint, please contact our Privacy Officer by email at vieprivee@stornowaydiamonds.com.