



Data Protection & Customer Privacy Policy

Letter from the Operations Director

At Blue Diamond Deluxe Private Transports, trust is the foundation of every journey we provide. Our customers entrust us not only with their transportation but also with their personal information, travel arrangements and, in many cases, highly confidential travel details. Protecting that trust is one of our highest priorities.

As a provider of premium private transportation services, we recognize that safeguarding personal data is fundamental to delivering a secure, reliable and professional customer experience. We are committed to handling all personal information responsibly, lawfully and transparently while respecting the privacy rights of every individual with whom we interact.

Our commitment extends to all aspects of our business, from reservation management and customer communications to financial transactions, supplier relationships and employee information. We continuously strive to maintain appropriate technical and organizational measures that protect personal data against unauthorized access, disclosure, alteration, loss or misuse.

This Data Protection & Customer Privacy Policy reflects our commitment to responsible information management, ethical business conduct and compliance with the General Data Protection Regulation (GDPR) and all applicable data protection legislation.

Protecting privacy is not solely a legal obligation, it is a commitment to maintaining the confidence that our customers, employees, suppliers and business partners place in Blue Diamond every day.

1. Scope

This Policy applies to all personal data processed by Blue Diamond Deluxe Private Transports, including information relating to customers, prospective customers, employees, suppliers, business partners and other individuals with whom the company conducts business.

The policy covers all personal data processed through our website, reservation systems, electronic communications, financial transactions, operational activities and any other business process involving personal information.

It applies to all employees, managers, contractors and any third party acting on behalf of Blue Diamond who may have access to personal data.



2. Our Guiding Principles

Blue Diamond processes personal data according to the following principles:

Lawfulness, Fairness and Transparency

We collect and process personal data only when there is a legitimate legal basis for doing so.

Individuals are informed about how their personal information is collected, used, stored and protected through clear and transparent communications.

Data Minimization

We collect only the personal information necessary to provide our transportation services, fulfill contractual obligations, comply with legal requirements and maintain efficient business operations.

We do not collect unnecessary or excessive personal information.

Confidentiality and Information Security

We are committed to protecting all personal and confidential information against unauthorized access, disclosure, alteration or destruction.

Appropriate administrative, organizational and technical safeguards are implemented to maintain the confidentiality, integrity and availability of information.

Employees are required to treat all customer and company information with the highest level of confidentiality.

Accuracy and Data Quality

We strive to ensure that personal information remains accurate, complete and up to date.

Where necessary, customers may request corrections to inaccurate or outdated personal information.

Storage Limitation

Personal information is retained only for as long as necessary to fulfill the purposes for which it was collected or to comply with applicable legal and regulatory obligations.

Once retention periods expire, personal data is securely deleted or anonymized whenever appropriate.



Respect for Individual Rights

Blue Diamond respects the privacy rights established under applicable data protection legislation.

Individuals may exercise their rights regarding access, correction, deletion, restriction of processing, objection and data portability, subject to applicable legal requirements.

3. Our Commitments

Blue Diamond is committed to:

- Processing personal data lawfully, fairly and transparently.
 - Protecting customer privacy throughout every stage of the customer journey.
 - Collecting only the information necessary to provide our services.
 - Maintaining appropriate technical and organizational safeguards to protect personal information.
 - Restricting access to personal data to authorized personnel with a legitimate business need.
 - Ensuring that employees understand their responsibilities regarding confidentiality and data protection.
 - Protecting payment-related information through secure payment solutions and appropriate financial controls.
 - Requiring suppliers and business partners who process personal data on our behalf to maintain appropriate data protection standards.
 - Responding promptly to requests relating to privacy rights.
 - Continuously improving our information security and data protection practices.
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4. Customer Privacy

Blue Diamond respects the privacy of every customer.

Personal information may be used only for legitimate business purposes, including:

- Managing reservations and transportation services.
- Communicating with customers regarding bookings.
- Processing payments and invoices.



- Meeting legal and regulatory obligations.
- Improving customer service.
- Responding to customer enquiries.

We do not sell, rent or otherwise disclose personal information to third parties for marketing purposes.

Whenever personal information must be shared with trusted service providers to deliver our services, such sharing is limited to what is strictly necessary and carried out in accordance with applicable legal requirements.

5. Data Security

Blue Diamond continuously works to protect information through appropriate security measures, including:

- Secure password management.
- Restricted access to customer information.
- Secure storage of electronic records.
- Secure disposal of confidential documents.
- Regular software updates and cybersecurity best practices.
- Employee awareness regarding confidentiality and data protection.

Although no information system can guarantee absolute security, we continuously evaluate our procedures to reduce risks and strengthen our protection measures.

6. Performance Indicators (KPIs)

Blue Diamond monitors the implementation of this Policy through the following Key Performance Indicators:

KPI	Target	Monitoring Frequency
Confirmed personal data breaches	Zero	Continuous
Confirmed unauthorized access to confidential information	Zero	Continuous
Employees receiving annual confidentiality and data protection awareness	100%	Annual
Customer requests regarding privacy rights responded to within applicable legal deadlines	100%	As required



KPI	Target	Monitoring Frequency
Confirmed GDPR non-compliance cases	Zero	Continuous

7. Monitoring and Responsibilities

The implementation of this Policy is overseen by the Operations Director, who is responsible for promoting compliance with applicable data protection legislation, monitoring information security practices and ensuring the continual improvement of the company's privacy management processes.

All employees are responsible for protecting confidential information, complying with this Policy and immediately reporting any actual or suspected data security incident.

The effectiveness of this Policy is monitored through periodic reviews of internal procedures, employee awareness activities, information security practices and the Key Performance Indicators established within this document.

Whenever opportunities for improvement are identified, appropriate corrective actions will be implemented to strengthen Blue Diamond's data protection and customer privacy practices.

8. Policy Review

This Policy shall be reviewed at least once every year, or earlier whenever significant legal, technological or organizational changes occur.

The annual review will evaluate:

- Compliance with applicable data protection legislation.
- Achievement of established KPIs.
- Information security incidents and corrective actions.
- Customer privacy requests and responses.
- Changes in technology and cybersecurity risks.
- Opportunities to strengthen information security and customer privacy.

Any revisions shall be approved by the Operations Director and communicated to all relevant stakeholders.

Our Commitment to Trust

Protecting personal information is an essential part of delivering the premium service our customers expect.



At Blue Diamond Deluxe Private Transports, we are committed to ensuring that every journey is supported by the highest standards of privacy, confidentiality and information security.

By combining professional excellence with responsible information management, we continue to strengthen the trust placed in us by our customers, employees, suppliers and business partners.

Approved by

Marco Fidalgo
Operations Director
Blue Diamond Deluxe Private Transports

Effective Date: January 2026

Next Scheduled Review: January 2027