



SimStar Asia Limited Privacy Policy for WhatsApp Business API Services

Effective Date: [01/07/2025]

Use of WhatsApp for Communication

We may contact you via WhatsApp to provide order updates, answer queries, or share relevant promotional offers. We only do this if you have explicitly opted in while filling out a form or placing an order.

By opting in, you consent to receive such messages.

1. Introduction and Scope

At **SimStar Asia Limited** ("we," "us," or "our"), we are committed to protecting the privacy and security of your personal data. This Privacy Policy provides a detailed explanation of how we collect, use, disclose, and safeguard information when you interact with our WhatsApp Business API services, which facilitate communication between diamond traders, retailers, and customers worldwide.

This policy applies to:

- **End Users:** Individuals who communicate with businesses using our WhatsApp Business API solutions.
- **Business Clients:** Companies that utilize our API services to engage with their customers.
- **Website Visitors:** Individuals who access our website, Android Application, iOS Application or related platforms.

We comply with:

- WhatsApp's Business and Commerce Policies : [Whatsapp Privacy](#) Policy
- General Data Protection Regulation (GDPR) (EU/UK)
- California Consumer Privacy Act (CCPA)
- UAE Data Protection Law (DPL)
- Other applicable regional data protection regulations



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2. Detailed Information We Collect

2.1 Data Collected Through WhatsApp Interactions

When you communicate with businesses via our WhatsApp Business API services, we may process:

- Contact Information: Your WhatsApp phone number, profile name, and status.
- Message Content: All text, images, videos, and documents exchanged in chats.

Metadata:

- Date and time stamps of messages
- Device information (OS version, handset model)
- IP addresses and approximate location data
- Unique message identifiers
- Delivery/read receipts

2.2 Data from Business Clients

Businesses using our API services may provide:

- Customer Databases: Contact lists with phone numbers and purchase histories.
- Transaction Records: Order details, payment information, shipping addresses.
- Diamond Certification Data: GIA/HRD reports, gemological details, valuation documents.
- Business Profile Information: Company names, representative contacts.

2.3 Automatically Collected Data

Our systems may gather:

- Usage Data: Frequency of messages, response times, preferred communication hours.
- Technical Data: Browser type, operating system, device identifiers.
- Analytics: Aggregated statistics on message volumes and engagement rates.

2.4 Special Category Data

In rare cases, we may process:

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- Biometric Data: When customers submit photos/videos for diamond verification.

3. Purposes and Legal Bases for Processing

Processing Purpose	Data Categories	Legal Basis
Message Delivery	Contact info, message content	Contractual necessity
Transaction Processing	Payment details, order info	Contractual necessity
Fraud Prevention	IP addresses, device data	Legitimate interest
Customer Support	Chat history, contact details	Legitimate interest
Service Improvement	Aggregated usage data	Legitimate interest
Marketing Communications	Phone numbers	Explicit consent
Regulatory Compliance	Transaction records	Legal obligation

4. Detailed Data Sharing Practices

4.1 Necessary Third-Party Sharing

We share data with:

- WhatsApp (Meta Platforms, Inc.): Required for message routing and delivery infrastructure.
- Payment Processors: If any.
- Shipping Providers: If any.
- Diamond Certification Labs: GIA, HRD, IGI (for verification services).

4.2 Technical Service Providers

We engage:

Cloud Hosting: AWS, Google Cloud (data storage)

CRM Platforms: Odoo, Diamtrade

Analytics Tools: Google Analytics, Mixpanel (usage statistics)



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4.3 Legal and Regulatory Disclosures

We may disclose information to:

Financial Regulators: For anti-money laundering compliance.

Law Enforcement: When legally compelled (court orders, subpoenas).

Tax Authorities: For VAT and transaction reporting.

All third parties are contractually bound to equivalent privacy standards through Data Processing Agreements (DPAs).

5. Comprehensive Security Measures

5.1 Technical Safeguards

End-to-End Encryption: For all message content in transit.

Encryption: For data at rest in our databases.

Network Security: Firewalls, intrusion detection systems, DDoS protection.

Access Controls: Multi-factor authentication, role-based permissions

5.2 Organizational Protections

Employee Training: Annual privacy and security awareness programs

Data Minimization: Collecting only what's strictly necessary

Breach Protocols: 72-hour GDPR notification procedures

6. Data Retention Framework

We retain data based on operational needs and legal requirements:

Data Type	Retention Period	Rationale
Chat Messages	24 months	Business operations

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Transaction Records	7 years	Tax/legal compliance
User Profiles	Until deletion request	Account management
Marketing Data	Until opt-out	Consent withdrawal
Backups	90 days	Disaster recovery

7. Your Rights and Choices

7.1 Access and Control

You may:

- Request a copy of your personal data (GDPR Article 15)
- Rectify inaccurate information (GDPR Article 16)
- Delete your data ("Right to be Forgotten," GDPR Article 17)
- Restrict processing under certain conditions (GDPR Article 18)

Your Data Rights (GDPR):

If you are located in the *European Economic Area (EEA)*, you have the following rights under the General Data Protection Regulation (GDPR):

- Right to access the personal data we hold about you.
- Right to request correction or deletion of your data.
- Right to object to or restrict the processing of your data.
- Right to data portability.

To exercise any of these rights, please contact us at info@simstar.co.

7.2 Communication Preferences

- Opt-out: Reply "**OPT OUT**" to any WhatsApp message or write to info@simstar.co
- Consent Withdrawal: Email info@simstar.co for marketing communications
- Do Not Sell: CCPA opt-out requests (via email : info@simstar.co)

7.3 Automated Decision-Making

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We do not use fully automated profiling that produces legal effects. All transaction screenings involve human review.

8. International Data Transfers

Data may be transferred globally with appropriate safeguards:

- EU-UAE Transfers: Standard Contractual Clauses (SCCs)
- US Transfers: Data Privacy Framework certification
- Other Regions: Binding Corporate Rules where applicable

9. Policy Updates and Version Control

We maintain a public changelog of policy revisions:

Version : 01

Date : 01-07-2025

Material changes will be notified via:

- WhatsApp business messages
- Email announcements
- Website banners (30 days prior)

10. Contact Information and Complaints

Data Protection Officer: Ms. Vyoma Patel

Email: vyoma.patel@simgems.com

Phone: [+91 9510024836]

Registered Office:

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This comprehensive policy ensures full transparency about our data practices while meeting the highest standards of global compliance. For any clarification, please contact at

[\[info@simstar.co\]](mailto:info@simstar.co).

VERSION	1
DATE	01-07-2025
CREATED BY	YASHWANTH RAVI
APPROVAL DATE	01-07-2025
APPROVED BY	AJAY PAUL