



PRIVACY POLICY

PRIME MARKETS LIMITED

NOVEMBER 2025

PRIVACY POLICY

Prime Markets Limited (the “Company” or “we”) is committed to protecting the privacy and confidentiality of all personal information it collects from its clients, users, and visitors to its website (the “Client” or “you”). This Privacy Policy sets out the manner in which the Company collects, processes, stores, and discloses personal data in accordance with the Data Protection Act, 2018 of Seychelles and other applicable legislation, and forms part of the Company’s general terms and conditions.

By accessing the Company’s website, using its services, or providing personal information to the Company, you acknowledge that you have read, understood, and accepted the terms of this Privacy Policy. The provisions of this Privacy Policy shall govern how your personal information is collected, processed, stored, disclosed, and otherwise handled by the Company, both during and after the termination of any business relationship.

1. DEFINITIONS

For the purposes of this Privacy Policy:

- **Personal Data** refers to any information relating to an identified or identifiable natural person, whether directly or indirectly, including, without limitation, name, address, contact details, financial information, identification documents, trading history, and other information provided to the Company;
- **Controller** refers to the natural or legal person, authority, or body which determines the purposes and means of processing personal data. In this Privacy Policy, the Company acts as the Controller in relation to the processing of Personal Data;
- **Processor** refers to any natural or legal person, authority, or body which processes Personal Data on behalf of the Controller; and
- **Client/User** refers to any individual or entity who accesses or uses the services of the Company or interacts with the Company’s website.

2. TYPES OF PERSONAL DATA COLLECTED

The Company may collect Personal Data from Clients in connection with the provision of its services, including, but not limited to, the following:

- **Identification Data:** This may include full name, date of birth, nationality, residential and mailing addresses, telephone numbers, email addresses, tax identification numbers, and other relevant identifiers.
- **Financial and Transactional Data:** Information relating to your financial status, such as income, net worth, banking details, trading activity, and history of transactions conducted through the Company.
- **Verification Data:** Documents used to verify identity, such as passports, national identity cards, utility bills, bank statements, and, where applicable, corporate documents for business clients.
- **Website and Service Usage Data:** Information generated automatically through the use of the Company's website or services, including IP addresses, cookies, login history, pages visited, trading patterns, and platform usage behavior.

Personal Data may be collected directly from Clients, during the account opening process or service use, or indirectly from third parties, including banks, authentication providers, public registers, and credit reference agencies.

3. LEGAL BASIS FOR PROCESSING

The Company processes Personal Data on one or more of the following legal bases:

3.1. Compliance with Legal Obligations

The Company is required to process Personal Data to comply with applicable laws and regulatory obligations in Seychelles, including, without limitation, the Anti-Money Laundering and Countering the Financing of Terrorism Act, 2020, and any rules or guidelines issued by relevant supervisory authorities. Such obligations include, among others, customer identification and verification, record-keeping, reporting suspicious transactions, and monitoring compliance with regulatory frameworks.

3.2. Performance of Contract

Personal Data may be processed as necessary for the performance of contractual obligations between the Company and its Clients, including, but not limited to, executing trades, managing accounts, and providing related services.

3.3. Legitimate Interests

The Company may process Personal Data to further its legitimate interests, provided that such interests do not override the rights and fundamental freedoms of the Client. Legitimate interests include improving services, understanding Client preferences,

communicating with Clients regarding services, and conducting research and analysis to enhance platform performance.

3.4. Consent

Where required, the Company will obtain explicit consent from Clients for processing Personal Data. Clients have the right to withdraw consent at any time by contacting the Company. The withdrawal of consent will not affect the legality of processing based on consent prior to its withdrawal.

4. USE OF PERSONAL DATA

The Company may use Personal Data for purposes including, but not limited to:

- Verifying the identity and suitability of Clients;
- Complying with legal and regulatory obligations;
- Maintaining accurate records of trading activities and communications;
- Communicating with Clients regarding services, updates, or requests;
- Conducting internal analyses and research to improve services; and
- Marketing products or services, subject to applicable consent requirements.

The Company may record communications, whether electronic, telephone, or in-person, for the purposes of monitoring compliance, training staff, and maintaining evidence of transactions and agreements.

5. DISCLOSURE OF PERSONAL DATA

The Company may disclose Personal Data to:

- Service providers and professional advisors engaged to provide IT, regulatory, compliance, accounting, or other support services;
- Partners, tied agents, or affiliates working exclusively for the Company;
- Regulatory authorities, law enforcement, or other governmental bodies where required by law;
- Any third party expressly authorized by the Client; and
- Entities involved in the detection or prevention of fraud, financial crime, or other unlawful activity.

Third parties that receive Personal Data from the Company are obliged to maintain its confidentiality and comply with all applicable data protection laws.

6. INTERNATIONAL DATA TRANSFERS

Personal Data may be transferred to countries outside Seychelles. Where such transfers occur, the Company ensures that appropriate safeguards are in place to protect the confidentiality, integrity, and security of Personal Data, consistent with applicable law.

7. DATA RETENTION AND SECURITY

- 7.1. The Company retains Personal Data only for as long as necessary to fulfill the purposes for which it was collected or to comply with legal obligations. In general, Personal Data is retained for at least five (5) years following the termination of the business relationship, or longer if required by law.
- 7.2. The Company implements organizational, technical, and administrative measures to protect Personal Data from unauthorized access, disclosure, alteration, and destruction. Access to Personal Data is limited to authorized employees and partners with a legitimate need to access such information.
- 7.3. While the Company endeavors to protect Personal Data, Clients acknowledge that no method of electronic transmission over the internet is completely secure.

8. CLIENT RIGHTS

Clients have the following rights under the Seychelles Data Protection Act, 2018:

- The right to access and obtain a copy of Personal Data held by the Company;
- The right to request correction of inaccurate or incomplete Personal Data;
- The right to request deletion of Personal Data, subject to legal constraints;
- The right to object to the processing of Personal Data based on legitimate interests or for marketing purposes;
- The right to request restriction of processing under certain circumstances; and
- The right to data portability for information provided by Clients through automated means.

Requests to exercise any of these rights should be made in writing to the Company's Compliance Officer with verified identification.

9. COOKIES AND WEBSITE TRACKING

The Company may use cookies or similar technologies to monitor website usage, enhance user experience, and analyze trends. Clients may configure their web browsers to refuse cookies, though this may limit certain functionality of the website.

10. QUESTIONS

If you have any questions regarding this Privacy Policy, wish to access, update, or correct your personal information, or require clarification on how your personal data is processed, you may contact the Company via email at support@goprimemarkets.com.

The Company will make reasonable efforts to respond promptly to your inquiries and provide guidance on your rights and the procedures for exercising them.

11. AMENDMENTS TO THIS PRIVACY POLICY

The Company may update this Privacy Policy from time to time to reflect changes in legal, regulatory, or operational requirements. The latest version will always be available on the Company's website. Clients are encouraged to review the Privacy Policy periodically.