



PRIME XBT

**PARTNER'S
PRIVACY POLICY**

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1. INTRODUCTION

This Privacy Policy for Prime XBT Trading Services Ltd (the "**Company**," "**we**," "**us**," or "**our**"), describes how and why we might collect, store, use, and/or share (the "**Process**") your information when you register for a Partner Account on our Partner Management Platform (the "**Partnership Programme**"), or when you:

- 1.1. Visit our website at www.primexbt.com, or any website (the "**Website**") of ours that links to this Partner's Privacy Policy;
- 1.2. Provide personal information during the course of our business relationship; and/or
- 1.3. Engage with us in other related ways, including any sales, marketing, or other events.

This Privacy Policy should be read in conjunction with the accompanying Introducing Brokers Agreement and/or Affiliates Agreement (the "**Agreement**") for a full understanding, as it forms an integral part of the Agreement governing our business relationship.

Reading this Privacy Policy will help you understand your privacy rights and choices. If you still have any questions or concerns, please contact us at partner@primexbt.com

2. WHAT INFORMATION DO WE COLLECT?

Personal information you disclose to us. We collect personal information that you voluntarily provide to us when you register on our Partnership Programme or otherwise provided during the course of our business relationship, when you participate in marketing activities, or when you contact us.

Personal Information Provided by You. The personal information that we collect depends on the context of your interactions with us. The personal information we collect may include, but is not limited to the following:

2.1. During Registration: Full Name, Email Address and Geolocation Data;

2.2. During Payout: Identification Document, Utility Bill, Wallet/Bank Account; and Corporate Documents (applicable to legal entities);

Payment Data. As indicated above, we will collect personal data necessary to process your payment, should you be eligible for such payment. All payment data collected is stored securely.

**All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.*

Information automatically collected. We automatically collect certain information when you visit, use, or navigate the Website. Information such as IP address, browser and device characteristics, operating system, language preferences, referring URLs and other technical information. This information is primarily needed to maintain the security and operation of our Website, and for our internal analytics and reporting purposes.

Information collected from other sources. We may collect limited data from public databases, marketing partners, social media platforms, and other outside sources.

Like many companies, we also collect information through cookies and similar technologies. You can find out more about this in our Cookie Policy available on our Website.

3. HOW DO WE PROCESS YOUR INFORMATION?

We process your information to provide, improve, and administer our Partnership Programme, to communicate with you, to comply with GDPR

requirements and for security and fraud prevention. We may also process your information for other purposes with your consent.

Specifically, we process your personal information in order to facilitate the Partner's account creation and authentication. We may process your information so you can create and log in to your account, as well as keep your account in working order.

4. WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR INFORMATION?

The General Data Protection Regulation (the “**GDPR**”) requires us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information:

- 4.1. **Contractual Obligation.** We will process your personal information as deemed necessary to fulfill our contractual obligations to you, including the Partnership Programme, or at your request prior to entering into an Agreement with you.
- 4.2. **Legal Obligations.** We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.
- 4.3. **Consent.** We may also process your information if you have given us permission (consent) to use your personal information for a specific purpose. You can withdraw your consent at any time.

In legal terms, we are generally the “Data Controller”, as defined under the GDPR, of the personal information described in this Privacy Policy, since we determine the means and/or purposes of the data processing we perform.

5. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

We may share information on specific situations described in this section and/or with the following categories of third parties.

Vendors, Consultants, and Other Third-Party Service Providers. We may share your data with third-party vendors, service providers, contractors, or agents (the “**Third Parties**”) who perform services for us or on our behalf and require access to such information to do that work. We have contracts in place with our third parties, which are designed to help safeguard your personal information.

This means that they cannot do anything with your personal information unless we have instructed them to do it. They will also not share your personal information with any organization apart from us.

We also may need to share your personal information in the following situations:

5.1. **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

5.2. **Affiliates.** We may share your information with our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include our parent company and any subsidiaries, joint venture partners, or other companies that we control or that are under common control with us.

5.3. **Business Partners.** We may share your information with our business partners to offer you certain products, services, or promotions.

6. WHAT IS OUR STANCE ON THIRD-PARTY WEBSITES?

The Website may link to other third-party websites, online services, or mobile applications and/or contain advertisements from third parties that are not

affiliated with us, and which may link to other websites, services, or applications. Accordingly, we do not make any guarantee regarding any such third parties, and we will not be liable for any loss or damage caused by the use of such third-party websites, services, or applications. You should review the policies of such third parties and contact them directly to respond to your questions.

7. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Policy, available on our Website.

8. IS YOUR INFORMATION TRANSFERRED INTERNATIONALLY?

We may transfer, store, and process your information in countries other than your own. Therefore, we have implemented measures to protect your personal information, including by using the European Commission's Standard Contractual Clauses for transfers of personal information between our group companies and between us and our third-party providers.

9. HOW LONG DO WE KEEP YOUR INFORMATION?

We will only keep your personal information in line with GDPR, for as long as it is necessary for the purposes set out in this Privacy Policy. In any case, the retention period shall not exceed five (5) years from the date of termination of our business relationship.

10. HOW DO WE KEEP YOUR INFORMATION SAFE?

We have implemented appropriate and reasonable technical and organisational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or

information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information.

Although we will do our best to protect your personal information, transmission of personal information to and from our Website is at your own risk. You should only access the Services within a secure environment.

11. DO WE COLLECT INFORMATION FROM MINORS?

We do not knowingly solicit data from or market to children under 18 years of age. By using the Website and/or registering for our Partnership Programme, you represent that you are at least 18 years old.

12. WHAT ARE YOUR PRIVACY RIGHTS?

Depending on your jurisdiction, you have certain rights under applicable GDPR. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability.

In certain circumstances, you may also have the right to object to the processing of your personal information. You can make such a request by contacting us via email at partners@primexbt.com. We will consider and act upon any request in accordance with applicable data protection laws.

Withdrawing your consent: If we are relying on your consent to process your personal information, which may be express and/or implied consent depending on the applicable law, you have the right to withdraw your consent at any time.

However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, when applicable law allows, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

Terminating your Account: Upon your request to terminate your Account, we will deactivate or delete your Account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our legal terms and/or comply with applicable legal requirements.

Cookies and similar technologies: Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Website.

13. HOW DO WE HANDLE POTENTIAL DATA BREACHES?

In case of a data breach of personal data, this shall be reported internally and documented by our Data Protection Officer (DPO). If deemed necessary, the DPO will further report the data breach to the applicable personal data authority. Where there is a material data breach, we will also notify the parties concerned. Data breached may include cybercrime, hacking or malware infection.

14. DO WE MAKE UPDATES TO THIS PRIVACY POLICY?

We may update this Privacy Policy from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this Privacy Policy, we will notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review

this Privacy Policy frequently to be informed of how we are protecting your information.

15. HOW CAN YOU CONTACT US ABOUT THIS POLICY?

If you have questions or comments about this Privacy Policy, you may contact our Data Protection Officer (DPO), by email at compliance@primexbt.com

16. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, change that information, or delete it. To request to review, update, or delete your personal information, please send an email request to compliance@primexbt.com