



COMBINED PRIVACY POLICY NOTICE

The B2Prime Group (consisting of, among others, B2B Prime Services EU Limited, B2B Prime Services and B2B Prime Services SC Ltd), operates in over 100 jurisdictions around the world. Due to variations in local privacy laws and regulatory requirements, each company within the group has its own privacy policy outlining how personal information is collected, used, and protected in line with the laws applicable to that company.

This combined privacy policy notice sets out the different privacy policies for the three above-named companies. The privacy policy that applies to you will be the one specific to the company with which you are onboarded upon signing up for B2Prime services. You will be informed of the relevant B2Prime company during the onboarding process, and its corresponding privacy policy will govern the handling of your personal information. Please review the policies carefully to understand how your data will be managed in accordance with the applicable legal framework.



B2PRIME

Privacy Policy Notice - B2B PRIME SERVICES EU LIMITED December 2024

1 APPLICATION

Thank you (hereinafter the "Website visitors", "potential clients", "active clients", "client", "other individuals", "individuals", "your", "data subjects" as appropriate) for using www.b2prime.com (hereinafter the "Website"). The website is owned and operated by B2B PRIME SERVICES EU LIMITED, (hereinafter the "Company", "we", "us", "our" as appropriate).

This Privacy Notice applies to all personal data relating to identifiable individuals that we collect through the means described in this Privacy Policy Notice and processes.

Before proceeding to use the Website, you must read the following terms carefully. If for any reason you are dissatisfied with this Privacy Policy Notice, you have the right either to stop browsing the Website or continue browsing the Website without submitting any personal information.

You acknowledge that you will not send us any personal data, if you do not want this information to be processed by us in the ways described in this Privacy Notice.

By using the Website, you are confirming that you understand English well enough to understand this Privacy Policy Notice.

2 POLICY STATEMENT

B2B PRIME SERVICES EU LIMITED intends to fully comply with all requirements of the REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April

2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter the "Regulation", or "GDPR" as appropriate) and of the Law 125(I) of 2018 Providing for the protection of natural persons with regard to the processing of personal data and for the free movement of such data (hereinafter the "Law"), in so far as they affect its activities.

The Company is located at 1 Georgiou Kaningos, Pamelva Court, Office 104, Limassol, Cyprus. You can contact us at Tel.: +357 25582192 and email info@b2prime.com.

Your privacy is of utmost importance to us and it is our policy to respect and safeguard the confidentiality of information and your privacy. This Privacy Policy Notice sets out how the Company collects, uses and manages your personal information we receive from you or a third party in connection with our provision of services to you or which we collect from your use of our services and/or our website and/or any other related websites and applications. The Privacy Policy Notice also informs you of your rights with respect to the processing of your personal information.

3 INTRODUCTION

B2B PRIME SERVICES EU LIMITED is a Cyprus Investment Firm authorized and regulated by the Cyprus Securities and Exchange Commission (CySEC) under license number 370/18, incorporated under Cyprus Company Law with Company Registration Number: HE 357630 and with registered office at 1 Georgiou Kaningos, Pamelva Court, Office 104, Limassol, Cyprus.

The Company needs to collect and use the personal data of Website visitors, potential clients, active clients and terminated clients and other individuals who are accessing or using the Company's website(s) and any mobile application(s) and come into contact with the Company.

In collecting and using personal data, we are committed to protecting an individual's right to privacy with regard to the processing of personal data, therefore this Privacy Policy Notice is hereby adopted in compliance with the Regulation and with the Law to support this commitment.

Under the REGULATION (EU) 2016/679 personal data is defined as: "any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

The Privacy Notice ensures that we:

- Comply with the REGULATION (EU) 2016/679
- Comply with the Law 125(I) of 2018
- Protect the rights of individuals related to the Company
- Are open about how we collect, use, store, access, disclose, transfer and destruct individual's data
- Reduce the risk of a data breach

We respect and value your data privacy rights, and make sure that all personal data collected from you are processed in adherence to the general principles of data protection as set out in the Regulation. In accordance these principles, the personal data shall be:

- processed lawfully, fairly and in a transparent manner;
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- accurate and, where necessary, kept up to date;
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.

4 PROCESSING OF PERSONAL DATA

4.1 Lawfulness of Collection and processing

The lawfulness of collection and processing of personal data by us is based on:

- the data subject has given consent to the processing of his or her personal data for one or more specific purposes; or
- the necessity to comply with our legal obligations; or
- for the performance of a contract to which we are a party or in order to take steps at the request of a prospect client prior to entering into a contract; or
- for the purpose of safeguarding our legitimate interests and managing our business.

4.1.1 Personal information/data we may collect about you

In order to receive more information, register for a demo account, open a trading account with us or for any other business relationship, you are requested to complete the Application Form. By completing the Application Form and providing your personal information, you enable us to evaluate the application and comply with the relevant laws and regulations governing the provision of financial services. The same information will be used by us to contact you regarding the offered services.

We may also collect information, throughout our cooperation, directly from you, through any correspondence made with us by phone, e-mail, in person or otherwise, including information which you enter when you register to use our website, mobile app, our demo sign up forms, subscribe to our service or any other activities carried out on our website or any connected applications.

We may also collect indirect information for you, which we use purely for verification, security or purely for browsing/ functionality purposes. Such information may include your (IP) address, browser type, operating system, mobile device ID and/or any device ID, Internet service provider (ISP), cookies.

We may also collect information about you from third parties either through bought-in third party marketing lists, publicly available sources, social media platform, introducers brokers and affiliates, bankers and credit card processors, subscription-based intelligence databases, credit references agencies, fraud prevention agencies, third authentication service providers, other financial institutions and the providers of registers, and other third party associates.

We may ask for other personal information from time to time (for example, through market research, surveys or special offers). If you choose not to provide the information we need to fulfil your request for a specific product or service, we may not be able to provide you with the requested product or service.

We collect sufficient evidence and information of potential clients and other individuals for their identity verification process, construction of their economic profile, home address verification and in general for complying with the relevant legislation, subject to our legal obligations.

These evidence and information may include but are not limited to:

- Name, surname, address, telephone number, email address and fax number if exist,
- Date of Birth,
- Gender,
- Nationality,
- Residential address,
- Passport or ID, or driving license,
- Proof of address, (i.e. Utility bill, bank statement, driving license, etc),
- Tax information (i.e. tax identification number),
- National Insurance numbers,
- CV,
- Bank Reference,
- Information on profession or occupation,
- Information of your education,
- Training details,
- Employment status, name of employer, if exist,
- Information about economic profile (e.g. size of wealth, source of wealth, income source),



- Information on whether you hold a prominent public function (PEPs),
- Trading activity, transaction history,
- Knowledge and experience in trading, risk tolerance and risk profile,
- Trading, risk tolerance and risk profile,
- Details about Bank account(s), e-wallets and credit card,
- Non Bankruptcy Certificate,
- Clean Criminal Record,
- Constituent letter,
- Reference from previous employers,
- Social media profile details,
- IP address.

We may ask to collect additional personal data for you under our legal obligation, update the personal data that we process and collect other additional personal data under any new legal requirement we are subject, as well as personal data information not obtained directly from the data subject.

In case a potential client has not become a client of the Company, the Company shall destroy his/her Personal data the soonest.

For the purpose of GDPR the Company acts as a data controller in respect of the Personal Data that we collect from you.

4.2 Purpose for which we will collect your personal data

We collect, use, disclose, store and process your personal data for the performance of our services as required by law. We use your personal data to provide you with the services and products you request through our Website, mobile application and Platform so as to perform our contractual obligations related to those services.

We also collect your personal data for internal purposes including the improvement of customer experience, promotional and marketing services (e.g. emails, social media, SMS), customer support, training purposes and administration matters. Such data is safely stored via physical or electronic means and procedural controls, and it is treated confidential. We only collect personal data that is adequate and relevant for the purposes of our business and the requested services and for a reasonable period of time as required by law. We never ask for more information other than those is required by law.

4.3 Use of personal data of clients and other individuals

We apply security measures for the protection of the personal data in use. The security measures include technical and organizational procedures.

We give access to personal information to employees who need the specific information in order to operate, develop or improve our services. These individuals are bound by confidentiality and will be subject to penalties if they fail to meet these obligations.

The personal data that the client provides are highly protected and can be accessed by the client using his/her selected password. This personal data is safely stored in the Company's servers that only authorised personnel have access to it through access rights. The Company encrypts all personal data to prevent unauthorized parties from viewing or access such information.

Personal data collected shall be used by us for the client's identity verification process, construction of client's

economic profile, client's home address verification and in general for complying with the relevant legislation, subject to our legal obligations and to decide for the establishment or not and the continuation of a business relationship with the client.

The personal data collected from other individuals is in use by the Company for a specific purpose, like for example the use of personal data for providing more information following a request for a business relationship.

We may use your personal information for one or more of the following purposes:

- to review your registration for the Company services and products;
- to confirm/verify your identity;
- to maintain your personal profile;
- to assess your appropriateness/suitability to the products and services we provide;
- to process your transactions;
- to manage the account you hold with us;
- to provide you with transaction and post transaction related services;
- to provide secure high-quality services and products;
- to inform you of products and/or services that may be of interest to you;
- to keep you updated on the issues that are relevant to your business relationship with us;
- to study how you use products and services from the Company;
- to analyse statistical data to enable us to provide you with better products and/or services;
- to develop and carry out marketing activities;
- to enhance the security controls of the Company's networks and systems;
- to identify, assess, mitigate, prevent and investigate fraudulent activity of any kind that is forbidden by the relevant legislation;
- to defend possible legal claims;
- to investigate or settle enquires or disputes or respond to complains;
- to comply with the relevant anti-money laundering compliance framework;
- to maintain various reports, registers, to comply with our legal obligations imposed by relevant laws to which we are subject, as well as specific statutory requirements (i.e. anti-money laundering laws, financial services laws, corporation laws, privacy law and tax laws). We do so not only to comply with our legal obligations but because it may also be in our legitimate interest to do so;
- to run the Company's business in an efficient and proper way including to manage our financial position, planning, communication, corporate governance, audit;
- for risk management purpose.

4.4 Storage of personal data

We apply appropriate security measures to protect the personal data that we process against any accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access as well as against any other unlawful processing.

We keep personal data physically/on paper and electronically.

4.5 Disclosure

We may disclose personal data that we process only pursuant to a lawful purpose and to authorized recipients of such personal data. Authorized recipients may include third parties with whom we have a contractual agreement for the provision of a service and shall refer as our partners. We shall take all the necessary effort in order our partners maintain the privacy of your personal data in accordance with the Regulation and the Law.

Where we use the services of third parties that assist us in providing services to you, that may include the transfer of personal data that we process and they are not partners as defined in the above paragraph, these third parties are required to maintain the confidentiality of such personal data and to use personal data that we may transfer to them only in the course of providing such services for the purposes that we dictate and within the ambit of the Regulation and the Law.

Authorised recipients of Personal Data may be for example:

- service providers and specialist advisers who have been contacted to provide us with administrative, IT, analytics, online marketing optimization, financial, regulatory, compliance, insurance, research or other services;
- technological experts that appointed by the Company to support the smooth operation of Company's systems;
- platform providers;
- payment service providers (PSPs)/credit institutions for facilitating the incoming and outgoing payments of the Clients;
- any third parties where this is necessary to process a transaction or provide services which you have requested;
- governmental authorities and regulatory bodies;
- fraud prevention agencies, third party authentication service providers, verification/screening service providers;
- data reporting service providers in order the Company to be able to meet its regulatory obligations;
- external consultants and outsourced functions' providers;
- Data Protection Officer in case the Company decides to be outsourced.
- anyone authorized by you.

Please note that the use of your personal information by external third parties who act as data controllers of your personal information is not covered by this Privacy Policy Notice and is not subject to our privacy standards and procedures.

4.6 Transfer

Where in case we will transfer personal data to a third country or international organization, we will ensure that:

- a) there is a decision by the European Commission that the third country, the territory or one or more specified sectors within that third country, or the international organization in question ensures an adequate level of protection; or
- b) in the absence of a decision as above, appropriate safeguards in accordance with the Regulation are in place and on condition that enforceable data subject rights and effective legal remedies for data subjects are available; or
- c) in the absence of a decision as (a) above or appropriate safeguards, as (b) above, are not in place, the transfer shall be performed only if one of the conditions described under Article 49 of the Regulation applies; or
- d) in the absence of a decision as (a) above or appropriate safeguards, as (b) above, are not in place or any of the provisions under Article 49 of the Regulation does not apply, the transfer shall be performed only if the transfer is not repetitive, concerns only a limited number of data subjects and it is necessary for the purposes of compelling legitimate interests pursued by us which are not overridden by the interests or rights and freedoms of the data subject.

4.7 Impact Assessment

We shall conduct a Privacy Impact Assessment (PIA) relative to all activities, projects and systems involving the processing of personal data prior to a type of processing that in particular using new technologies, and taking into account the nature, scope, context and purposes of the processing, is likely to result in a high risk to the rights and freedoms of data subjects.

4.8 Destruction

After the storage period, as defined below under the paragraph “**6. For how long we keep your personal data**”, is ended, we will destroy hard copies of personal data and personal data that are kept electronically.

5 ANALYTICS

We use analytics services from third parties to help analyze how the users use the Website. These analytics services use cookies, scripts, and other technologies to collect and store information such as how users interact with the Website, how often users visit the Website, what pages of the Website the users visit, and what other sites the users used prior to coming to the Website.

6 FOR HOW LONG THE WE KEEP YOUR PERSONAL DATA

Safeguarding the privacy of your information is of utmost importance to us, whether you interact with us personally, by phone, by mail, over the internet or any other electronic medium. We will retain the information for no longer than it is necessary for the purposes for which it was collected or for which is to be further processed. We will keep personal data of clients during the time of business relationship.

In accordance with our legal obligations, at the time the business relationship of the Company with the client is terminated, we should keep client's personal data for a period of at least five (5) years, which is calculated after the termination of the business relationship. We may keep personal data for longer than 5 years in cases where the personal data cannot be deleted for legal, regulatory or technical reasons.

In addition to the above in some cases there are legal requirements to keep personal data for a minimum period, e.g. for accounting, tax purposes as well as for other legal, regulatory or technical reasons.

7 SUBJECT TO CONSENT

By using our Website(s) and/or our Apps, registering with us or submitting information to us you consent and agree with the terms of this Privacy Policy Notice and the [Cookies Policy](#) and you hereby consent to the collection, processing, storage, use and disclosure of your personal data by the Company whether such use is



by the Company or by another third party which may be required by them in order to effectively perform Services in connection with the Company's Terms and Conditions or effectively execute any related operational function performed by the Company to its Clients in accordance with this Privacy Policy Notice. If you do not agree with this Privacy Policy Notice, you must not use our Website and our Apps, access our services or submit information to us.

You can withdraw your consent at any time by contacting us at info@b2prime.com. Please note that the processing of your personal data is necessary in order to provide you with requested services.

8 PROCESSING FOR OTHER REASON

We will ask to receive data subject's consent in any case we will process data subject's personal data for a purpose other than that for which personal data have been collected.

9 DATA SUBJECTS RIGHTS

All individuals who are the data subject of personal data held by us are entitled to the below rights as these are defined in the Regulation and the Law, unless these rights are subject to a restriction under the same Regulation and Law:

- **Right of access.** You have the right to request a copy of your personal data which we hold about you. We will provide a copy of your personal data that is undergoing processing. For any further copies requested by you, we may charge a reasonable fee based on administrative costs.

You can send an email to info@b2prime.com asking for a copy of your personal data that is undergoing processing.
- **Right to rectification.** You have the right to request the rectification of any inaccurate personal data which we hold about you.
- **Right to erasure.** You have the right, under certain circumstances as these are defined in the Regulation, to request the erasure of personal data which we hold about you.
- **Right to restriction of processing.** Where there is a dispute in relation to the accuracy or processing of your personal data, you have the right to request a restriction on further processing, in accordance with the Regulation.
- **Right to data portability.** Where the processing is based on consent or on a contract and the processing is carried out by automated means, you have the right to receive the personal data and to transmit this data to another controller.
- **Right to object.** Where applicable under the Regulation, you have the right to object to the processing of your personal data.
- **Right not to be subject** to a decision based solely on automated processing, including profiling.

In cases we will use automated processing (e.g. through automatic profiling / appropriateness test), for a decision concerning you or significantly affects you, you can request not to be subject to such a decision unless we can demonstrate to you that such decision is necessary for entering into, or the performance of, a contract between you and us. Even if a decision is necessary for entering into or performing a contract, you may contest the decision and require human intervention. We may not be able to offer our services or products to you, if we agree to such request (i.e., end our relationship with you).



- **Right to withdraw your consent.** Where the processing is based on your consent, you have the right to withdraw your consent at any time.

To withdraw your consent, send an email to info@b2prime.com asking to withdraw your consent.

- **Right to lodge a complaint** with a competent authority.

In such case, we ask the data subject in the first instance to contact us at the email info@b2prime.com.

Data subjects can exercise any of the above rights by contacting us through email at info@b2prime.com or by post at postal address: 1 Georgiou Kaningos, Pamelva Court, Office 104, Limassol, Cyprus.

The requested information will be provided free of charge. We reserve the right to charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested or refuse to act on the request, if in case your request is manifestly unfounded or excessive.

10 IP ADDRESS

We may collect information about your computer, including, where available, your IP address, operating system browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns. We use this information for the operation of the Website, to maintain quality of the Website and to provide general statistics regarding use of the Website.

11 RECORDING OF TELEPHONE CONVERSATIONS AND OF ELECTRONIC COMMUNICATION

We record, monitor and process any telephone conversations and/or electronic communications between the Company and you. All such communications are recorded and/or monitored and/or processed by us, including any telephone conversations and/or electronic communications that result or may result in transactions or your order services even if those conversations or communications do not result in the conclusion of such transactions. The content of relevant in person conversations and/or communications with you may be recorded by minutes or notes.

12 COOKIES

Cookies are small text files created by the websites you visit or by certain emails you open and are placed on your computer or other device. Cookies are used to track, save and store information about the user's interactions and usage of the website in order to improve the user experience, enable functionality on the website, facilitate site security and provide the business with marketing information about the website's visitors. Cookies do not transfer viruses or malware to your computer. Cookies generally can easily be viewed and deleted and are harmless and serve crucial functions for websites.

We use cookies to continually improve your experience with the Website, for example making the Website quicker and remembering visitors' previous interactions with the Website.

For more details about the use of cookies by the Website, please refer to our "Cookies Policy".

13 BREACH AND SECURITY INCIDENTS

Breach of security leads to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or

access to, personal data transmitted, stored or otherwise processed. We are responsible for ensuring immediate action in the event of a security incident or personal data breach.

We have in place procedures to deal with any suspected personal data breach and we will notify you and the relevant competent regulator (<http://www.dataprotection.gov.cy>) for the breach where we are legally required to do so. If you require further information on how we deal with a Data Breach, please contact us at info@b2prime.com.

14 MARKETING INFORMATION

We may periodically send promotional emails, newsletters and other emails about new services, Company's news or other information which we think you may find interesting. From time to time, we may also use your information to contact you for market research purposes, although you do not have to respond to them. We may contact you by email, phone, fax or mail when available. We may use the information to customize the Company's website(s) according to your interests.

In this respect, when we send you promotional emails, newsletters and other emails containing marketing information, you have the opportunity in an easy manner and free of charge to object to the use of your contact details, by automatically opt out of receiving further promotional emails, newsletters and other emails containing marketing information.

15 SECURITY AND CONFIDENTIALITY

We recognize the importance of guarding the security of your personal information and on-line communications. We have implemented appropriate security measures to ensure a level of security appropriate to the risk involved and we have implemented technical and physical security procedures designed to protect personal data from unauthorized access, disclosure, use, and modification.

We give access to personal data that is collected about you only to those who actually need this information for the purpose of providing to you our services. The Website operating personnel is suitably qualified, possesses the necessary technical knowledge and personal integrity for maintaining confidentiality.

We review the implemented security measures on an ongoing basis and at least once a year to consider new technology and methods as necessary. However, please understand that the implementation of security measures as described in this Privacy Policy Notice does not guarantee the security of your personal data.

The transmission of information via the Internet or email is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data as it is transmitted and stored.

16 CHILDREN

No one under 16 years of age is authorized to use the Website and we do not intentionally process personal data from anyone under the age of 16. If you are a parent or the holder of parental responsibility of a person under the age of 16 who has submitted personal data, please contact us at info@b2prime.com.

17 LINKS TO OTHER WEBSITES

This Privacy Policy Notice applies only to the Website, excluding third party websites as we may provide links to other websites which we believe may be of interest to the Website visitors. We want to believe that these

websites are of the highest standard. However, due to the nature of the World Wide Web, we cannot guarantee the standards of every linked website or be responsible for their content. We undertake no liability regarding the contents of the said links and third party websites in general, since they should have their own privacy policy. Please check these policies before you submit any data to these third party websites. For any problems arising during the use of the links, users must directly refer to the relevant websites which are responsible for the provision of their services. These linked sites are only for your convenience and you therefore access them at your own risk.

18 DATA PROTECTION OFFICER (DPO)

We have appointed a Data Protection Officer (DPO) who has a number of important responsibilities including but not limited to:

- a) monitoring Company's compliance with the provisions of the GDPR;
- b) raising awareness of data protection issues, training Company's staff and conducting internal audits; and
- c) cooperating with the supervisory authority.

The DPO may be contacted regarding questions, comments and/or complaints regarding this Privacy Policy Notice as well as the processing activities of the Company. For any type of inquiry relevant to the processing of personal data, the data subject may contact us at:

Tel: +357 25582192

Email: info@b2prime.com.

Mailing Address: 1 Georgiou Kaningos, Pamelva Court, Office 104, Limassol, Cyprus

In case of a complaint, we ask the data subject to contact us at first instance at the email: info@b2prime.com.

For any type of inquiry or complaint, we may request the provision of additional information necessary to confirm the identity of the data subject who makes the request or complaint.

19 VALIDITY

This Privacy Notice is effective this 02 day of December, 2024, until revoked or amended by us.

We reserve the right to change or amend this Privacy Policy Notice without further notice to you, provided that the changes do not significantly reduce your rights under this Privacy Policy Notice. The date that this Privacy Policy Notice is updated will be visible at the end of this Privacy Policy Notice. We recommend you to review this Privacy Policy Notice frequently in order to stay updated about any possible changes.

If we make material changes to this Privacy Policy Notice, then you will be notified by means of a notice on the Website's homepage.

Any revised Privacy Policy Notice will be effective immediately upon posting on the Website.

The latest and prevailing version of this Privacy Policy Notice will at all times be available on the Website.

20 LEGAL DISCLAIMER

We reserve the right to disclose your personal data as required by the Regulation and the Law and when we believe that disclosure is necessary to protect our rights and/or to comply with a judicial proceeding, court order, legal process served or pursuant to governmental, intergovernmental or other regulatory bodies. We will not be liable for misuse or loss of personal data resulting from cookies on the website that we do not have access to or control over. We will not be liable for unlawful or unauthorized use of your personal data due to misuse or misplacement of your passwords, negligent or malicious intervention and/or otherwise by you or due to your acts or omissions or a person authorized by you (whether that authorization is permitted by the terms of our legal relationship with you or not).

PRIVACY POLICY - B2B PRIME SERVICES

March 2025

1. GENERAL

This Privacy Policy governs collection, processing and use by us of your Personal Information that you provide us when accessing or using the website www.b2prime.com (hereinafter – the “Website”) and any products or services offered by the us (**hereinafter** – “Services”).

"Personal Information" refers to information that identifies an individual, such as name, address, e-mail address, financial information, and banking details. “Personal Information” does not include anonymized and/or aggregated data that does not identify a specific user. We are committed to protecting and respecting your privacy. The purpose of this Privacy Policy is to describe:

- The types of Personal Information we collect and how it may be used;
- How and why we may disclose your Personal Information to third parties;
- The transfer of your Personal Information;
- Your right to access, correct, update, and delete your Personal Information;
- The security measures we use to protect and prevent the loss, misuse, or alteration of Personal Information;
- Our retention of your Personal Information;
- Some basic information regarding our use of cookies (for more details, please see our Cookie Policy).

2. WHO WE ARE

This Privacy Policy governs how we, B2B Prime Services (subsidiary of B2B Prime Services EU Limited) a Mauritius Global Business Company (GBC) registered with the Corporate and Business Registration Department, a Department of the Ministry of Finance, Economic Planning and Development with a File Number C149003, and authorized and regulated by the Financial Service Commission of Mauritius (the FSC) under license # C117017139 issued on November 12, 2021, collect, process and use Personal Information.

We are a “controller” and “processor” for the purposes of the Data Protection Act 2017.

3. COLLECTION AND USE OF PERSONAL INFORMATION

3.1. PERSONAL INFORMATION WE COLLECT

We collect the following Personal Information:

- Contact information, such as name, home address, and E-mail address.
- Account information, such as username and password.
- Financial information, such as bank account numbers, bank statement, trading activity and history, commissions charged, etc.
- Identity verification information, such as images of your government issued ID, passport, national

ID card, driving license or other documents requested by our compliance department.

- Residence verification information, such as Utility bill details or similar information.
- Other information, obtained during our KYC procedures, such as information about your financial state and source of funds;

We also automatically collect certain computer, device, and browsing information when you access the Website or use of Services. This information is aggregated to provide statistical data about our users' browsing actions and patterns, and does not personally identify individuals. This information may include:

- The information about the computer or mobile device you use to access our Website, including the
- hardware model, operating system and version, the web browser you use, IP addresses and other device identifiers.
- Website usage information, the server log information, which may include (but is not limited to) your login details, the date and time of visits, the pages viewed, your IP address, time spent at our Website and the websites you visit just before and just after our Website.
- The bandwidth upload and download speeds, the amount of free and used storage space on your device and other statistics about your device.

We may automatically capture, store and otherwise process information about you even if you abandon the completion of an online application or registration form.

3.2. IP ADDRESS

We may collect information about your computer, including, where available, your IP address, operating system browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns. We use this information for the operation of the Website, to maintain quality of the Website and to provide general statistics regarding use of the Website.

3.3. RECORDING OF TELEPHONE CONVERSATIONS AND OF ELECTRONIC COMMUNICATION

We record, monitor and process any telephone conversations and/or electronic communications between the Company and you. All such communications are recorded and/or monitored and/or processed by us, including any telephone conversations and/or electronic communications that result or may result in transactions or your order services even if those conversations or communications do not result in the conclusion of such transactions. The content of relevant in person conversations and/or communications with you may be recorded by minutes or notes.

3.4. USE OF COOKIES AND SIMILAR TECHNOLOGY

The Website uses cookies. Cookies are small text files that are placed on your computer by websites

that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. Cookies are typically stored on your computer's hard drive.

Our Website uses cookies to enable you to use the Website, the Services we offer and the materials on the Website. Cookies are also used to distinguish you from other users of our Website. This helps us to provide you with a good experience when you browse our Website and also allows us to improve our Website.

For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy.

3.5. HOW WE USE YOUR PERSONAL INFORMATION

Personal data is processed to fulfill contractual obligations, comply with legal and regulatory requirements (AML/KYC), and, where required, with consent. We may use your Personal Information to:

- Process your transactions. We will process your Personal Information only for the purpose(s) for which it has been provided to us;
- Fulfill our legal or regulatory requirements;
- Verify your identity in accordance with the applicable legislation and our Anti Money Laundering policy, as well as address other law enforcement needs. We also may share your information with other financial institutions and with tax authorities if such actions are required from us due to any applicable legislation;
- Detect, investigate and prevent fraudulent transactions or unauthorized or illegal activities;
- Protect our rights and property;
- Personalize your Services experience;
- Analyze Website usage, and improve our Website and Website offerings. Analyzing and tracking data to determine the usefulness or popularity of certain content and to better understand the online activity of our Website users;
- Help us respond to your customer service requests and support needs, answer your inquiry or respond to a communication from you;
- Contact you about Services. The email address you provide may be used to communicate information and updates related to your use of the Services. We may also occasionally communicate technical notices, support or administrative notifications, company news, updates, promotions, and related information relating to similar products and Services provided by us.
- Administer a contest, promotion, survey or other features as will be more explained on the Website;
- Link, connect or combine Personal Information we collect from or about you with other Personal Information; and
- Carry out any other purpose or reason for which the Information was collected.

We do not perform behavioral tracking of a customer's activities on our Website or across different

Websites, nor do we allow third-party data collection through our services.

3.6. *MARKETING AND OPT-OUT*

We may periodically send promotional emails, newsletters and other emails about new services, our news or other information which we think you may find interesting. From time to time, we may also use your information to contact you for market research purposes, although you do not have to respond to them. We may contact you by email, phone, fax or mail when available. We may use the information to customize the Website according to your interests.

In this respect, when we send you promotional emails, newsletters and other emails containing marketing information, you have the opportunity in an easy manner and free of charge to object to the use of your contact details, by automatically opting out of receiving further promotional emails, newsletters and other emails containing marketing information.

Alternatively, if you wish to stop receiving marketing communications from us, please contact us at info@b2prime.com to opt-out.

4. *DISCLOSING AND TRANSFERRING PERSONAL INFORMATION*

We may disclose your Personal Information to third parties and legal and regulatory authorities, and transfer your Personal Information as described below:

4.1. *DISCLOSURES TO THIRD PARTIES*

In processing your transactions, we may share some of your Personal Information with our third party service providers who help with our business operations. Your information will not be sold, exchanged, or shared with any third parties without your consent, except to provide Services or as required by law. By using Website or Services you consent to the disclosure of your Personal Information as described in this Privacy Policy.

Non personally identifiable visitor information may be provided to third parties for marketing, advertising, or other uses. Our third party service providers are contractually bound to protect and use such information only for the purposes for which it was disclosed, except as otherwise required or permitted by law. We ensure that such third parties will be bound by terms no less protective than those described in this Privacy Policy, or those we are subject to under applicable data protection laws.

4.2. *DISCLOSURES TO LEGAL AUTHORITIES*

We may share your Personal Information with law enforcement, data protection authorities, government officials, and other authorities when:

- Compelled by subpoena, court order, or other legal procedure.
- We believe that the disclosure is necessary to prevent physical harm or financial loss.

- Disclosure is necessary to report suspected illegal activity.
- Disclosure is necessary to investigate violations of this Privacy Policy or any other agreement with you.

4.3. *INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION*

We store and process your Personal Information in data centers around the world, wherever our facilities or service providers are located. As such, we may transfer your Personal Information between such data centers. Such transfers are undertaken in accordance with our legal and regulatory obligations and are performed only via protected channels.

4.4. *OTHER CIRCUMSTANCES FOR DISCLOSURE OF PERSONAL INFORMATION*

We can also disclose your Personal Information in the following circumstances:

- with your consent or at your instruction. Certain information you may choose to share may be displayed publicly, such as your username and any content you post when you use interactive areas of our Website like our online forums;
- with our current or future parent companies, affiliates, subsidiaries and with other companies under common control or ownership with us or our offices internationally. We ensure that listed parties will be bound by terms not less protective those described in this Privacy Policy, or those we are subject to under applicable data protection laws;
- if the sharing of Personal Information is necessary for protection of our rights and property, or rights and property of the above listed current or future parent companies, affiliates, subsidiaries and with other companies under common control or ownership with us or our offices;

5. *EXTERNAL WEBSITES*

Occasionally, the Website may provide references or links to other websites operated by third parties ("External websites"). We do not control these External websites or any of the content contained therein. You agree that we are in no way responsible or liable for External websites referenced or linked from our Website, including, but not limited to, website content, policies, promotions, products, services or actions and/or any damages, losses, failures or problems caused by, related to, or arising from those sites. External websites have separate and independent privacy policies. We encourage you to review the policies, rules, terms, and regulations of each site that you visit. We seek to protect the integrity of our site and welcome any feedback about External website information provided on our Website.

6. *YOUR RIGHTS REGARDING YOUR PERSONAL INFORMATION*

You have the right to access your Personal Information to correct, update, and block inaccurate and/or incorrect data. To exercise this right, contact us at info@b2prime.com. Within 40 days of receipt of your written request we will provide you with your Personal Information, including the purposes for which it

was used and to whom it was disclosed to in accordance with applicable legislation. We reserve the right to request any additional information from you that may be necessary to provide a full response to your request, in accordance with applicable legislation.

Please note that if we are unable to verify your identity by e-mail messages or at your application to the call center, or in the case of reasonable doubts concerning your identity, we may ask you to provide a proof of identity, including by personal appearance in our office. This is the only way we can avoid disclosing your Personal Information to anyone impersonating you.

In some cases, we will not be able to change your Personal Information. In particular, such cases can include the event when your personal information has already been used during the execution of any agreement or transaction, or is specified in any official document, etc.

You have the right to withdraw your consent to personal data processing. You may also exercise your right of erasure (right to be forgotten). In such cases, we will delete your Personal Information we process, except for those Personal Information which we are obliged to store in accordance with the requirements set forth by the applicable legislation.

Please be advised that in case of realization of your right of withdrawal of consent to personal data processing or right to be forgotten, we may not be able to provide you our products or services, and we have a special right to terminate all our current agreements with you, including all legal consequences of such termination, and you irrevocably acknowledge such right.

In order to withdraw your consent to personal data processing and/or exercise your rights to be forgotten, please contact us at info@b2prime.com. Furthermore, in this case, for the purposes of safety, we may request you to present your ID document, including directly at our office.

7. SECURITY OF PERSONAL INFORMATION

We use a variety of security measures to ensure the confidentiality of your Personal Information, and to protect your Personal Information from loss, theft, unauthorized access, misuse, alteration or destruction. These security measures include, but are not limited to:

- Password protected directories and databases.
- Secure Sockets Layered (SSL) technology to ensure that your information is fully encrypted and sent across the Internet securely.
- Limited access to hosting servers using 2FA and traffic encryption
- All financially sensitive and/or credit information is transmitted via SSL technology and encrypted in our database. Only authorized personnel are permitted access to your Personal Information, and these personnel are required to treat the information as highly confidential.

These security measures will be reviewed regularly in light of new and relevant legal and technical developments.

We keep personal data physically/on paper and electronically.

8. BREACH AND SECURITY INCIDENTS

Breach of security leads to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed. We are responsible for ensuring immediate action in the event of a security incident or personal data breach.

We have in place procedures to deal with any suspected personal data breach and we will notify you and the relevant competent regulator for the breach where we are legally required to do so. If you require further information on how we deal with a data breach, please contact us at info@b2prime.com.

9. CHILDREN

No one under 16 years of age is authorized to use the Website and we do not intentionally process personal data from anyone under the age of 16. If you are a parent or the holder of parental responsibility of a person under the age of 16 who has submitted personal data, please contact us at info@b2prime.com.

10. RETENTION OF PERSONAL INFORMATION

We retain Personal Information for as long as necessary to fulfil purposes described in this Privacy Policy, subject to our own legal and regulatory obligations. In accordance with our record keeping obligations, we will retain account and other Personal Information for at least seven years after termination of respective agreement.

11. CONTACT US

Please contact us with questions, comments, concerns or complaints regarding our Privacy Policy and/or practices at info@b2prime.com

12. COMPLAINTS

If you are unsatisfied with our response to your concerns or complaints, you have the right to lodge a complaint with the Data Protection Commissioner of Mauritius, more information about which can be found on their website.

13. VALIDITY

This Privacy Notice is effective this 1st day of March 2025, until revoked or amended by us.

We reserve the right to change or amend this Privacy Policy without further notice to you, provided that the changes do not significantly reduce your rights under this Privacy Policy. We recommend you to review this Privacy Policy frequently in order to stay updated about any possible changes. If we make



material changes to this Privacy Policy, then you will be notified by means of a notice on the Website.

The latest and prevailing version of this Privacy Policy will at all times be available on the Website and will be effective immediately upon posting on the Website.

PRIVACY POLICY - B2B PRIME SERVICES SC LTD

March 2025

1. GENERAL

This Privacy Policy governs collection, processing and use by us of your Personal Information that you provide us when accessing or using a website www.b2prime.com (hereinafter – the “Website”) and any products or services offered by the us (hereinafter – “Services”).

"Personal Information" refers to information that identifies an individual, such as name, address, e-mail address, financial information, and banking details. “Personal Information” does not include anonymized and/or aggregated data that does not identify a specific user. We are committed to protecting and respecting your privacy. The purpose of this Privacy Policy is to describe:

- The types of Personal Information we collect and how it may be used;
- How and why we may disclose your Personal Information to third parties;
- The transfer of your Personal Information;
- Your right to access, correct, update, and delete your Personal Information;
- The security measures we use to protect and prevent the loss, misuse, or alteration of Personal Information;
- Our retention of your Personal Information;
- Some basic information regarding our use of cookies (for more details, please see our Cookie Policy).

2. WHO WE ARE

This Privacy Policy governs how we, **B2B Prime Services SC Ltd** (subsidiary of B2B Prime Services EU Limited) licensed and regulated by the Seychelles Financial Services Authority (SFSA) with Security Dealer License SD192, collect, process and use Personal Information.

We are a “data controller” for the purposes of the Data Protection Act 2023.

3. COLLECTION AND USE OF PERSONAL INFORMATION

3.1. PERSONAL INFORMATION WE COLLECT

We collect the following Personal Information:

- Contact information, such as name, home address, and E-mail address.
- Account information, such as username and password.
- Financial information, such as bank account numbers, bank statement, trading activity and history, commissions charged, etc.
- Identity verification information, such as images of your government issued ID, passport, national ID card, driving license or other documents requested by our compliance department.
- Residence verification information, such as Utility bill details or similar information.
- Other information, obtained during our KYC procedures, such as information about your financial

state and source of funds;

We also automatically collect certain computer, device, and browsing information when you access the Website or use of Services. This information is aggregated to provide statistical data about our users' browsing actions and patterns, and does not personally identify individuals. This information may include:

- The information about the computer or mobile device you use to access our Website, including the
- hardware model, operating system and version, the web browser you use, IP addresses and other device identifiers.
- Website usage information, the server log information, which may include (but is not limited to) your login details, the date and time of visits, the pages viewed, your IP address, time spent at our Website and the websites you visit just before and just after our Website.
- The bandwidth upload and download speeds, the amount of free and used storage space on your device and other statistics about your device.

We may automatically capture, store and otherwise process information about you even if you abandon the completion of an online application or registration form. Data collected from incomplete or abandoned online applications or registration forms will be retained for a period of 7 years solely for internal analysis and fraud prevention purposes. After this period, the data will be anonymized or securely deleted unless retention is required for legal or regulatory compliance.

3.2. IP ADDRESS

We may collect information about your computer, including, where available, your IP address, operating system browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns. We use this information for the operation of the Website, to maintain quality of the Website and to provide general statistics regarding use of the Website.

3.3. RECORDING OF TELEPHONE CONVERSATIONS AND OF ELECTRONIC COMMUNICATION

We record, monitor and process any telephone conversations and/or electronic communications between the Company and you. All such communications are recorded and/or monitored and/or processed by us, including any telephone conversations and/or electronic communications that result or may result in transactions or your order services even if those conversations or communications do not result in the conclusion of such transactions. The content of relevant in person conversations and/or communications with you may be recorded by minutes or notes. All recorded telephone conversations and electronic communications shall be retained for a period of 7 years in accordance with applicable legal and regulatory requirements. Access to such records will be limited to authorized personnel and may only be shared with third parties under legal compulsion or regulatory obligation.

3.4. USE OF COOKIES AND SIMILAR TECHNOLOGY

The Website is using cookies. Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. Cookies are typically stored on your computer's hard drive.

Our Website uses cookies to enable you to use the Website, the Services we offer and the materials on the Website. Cookies are also used to distinguish you from other users of our Website. This helps us to provide you with a good experience when you browse our Website and also allows us to improve our Website.

For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy.

3.5. HOW WE USE YOUR PERSONAL INFORMATION

Personal data is processed to fulfill contractual obligations, comply with legal and regulatory requirements (AML/KYC), and, where required, with consent. We may use your Personal Information to:

- Process your transactions. We will process your Personal Information only for the purpose(s) for which it has been provided to us;
- Fulfill our legal or regulatory requirements;
- Verify your identity in accordance with the applicable legislation and our Anti Money Laundering policy, as well as address other law enforcement needs. We also may share your information with other financial institutions and with tax authorities if such actions are required from us due to any applicable legislation;
- Detect, investigate and prevent fraudulent transactions or unauthorized or illegal activities;
- Protect our rights and property;
- Personalize your Services experience;
- Analyze Website usage, and improve our Website and Website offerings. Analyzing and tracking data to determine the usefulness or popularity of certain content and to better understand the online activity of our Website users;
- Help us respond to your customer service requests and support needs, answer your inquiry or respond to a communication from you;
- Contact you about Services. The email address you provide may be used to communicate information and updates related to your use of the Services. We may also occasionally communicate technical notices, support or administrative notifications, company news, updates, promotions, and related information relating to similar products and Services provided by us.
- Administer a contest, promotion, survey or other features as will be more explained on the Website;
- Link, connect or combine Personal Information we collect from or about you with other Personal Information; and

- Carry out any other purpose or reason for which the Information was collected.

We do not perform behavioral tracking of a customer's activities on our Website or across different Websites, nor do we allow third-party data collection through our services.

3.6. MARKETING AND OPT-OUT

We may periodically send promotional emails, newsletters and other emails about new services, our news or other information which we think you may find interesting. From time to time, we may also use your information to contact you for market research purposes, although you do not have to respond to them. We may contact you by email, phone, fax or mail when available. We may use the information to customize the Website according to your interests.

In this respect, when we send you promotional emails, newsletters and other emails containing marketing information, you have the opportunity in an easy manner and free of charge to object to the use of your contact details, by automatically opting out of receiving further promotional emails, newsletters and other emails containing marketing information.

Alternatively, if you wish to stop receiving marketing communications from us, please contact us at info@b2prime.com to opt-out.

4. DISCLOSING AND TRANSFERRING PERSONAL INFORMATION

We may disclose your Personal Information to third parties and legal and regulatory authorities, and transfer your Personal Information as described below:

4.1. DISCLOSURES TO THIRD PARTIES

In processing your transactions, we may share some of your Personal Information with our third party service providers who help with our business operations. Your information will not be sold, exchanged, or shared with any third parties without your consent, except to provide Services or as required by law. By using Website or Services you consent to the disclosure of your Personal Information as described in this Privacy Policy.

Non personally identifiable visitor information may be provided to third parties for marketing, advertising, or other uses. Our third party service providers are contractually bound to protect and use such information only for the purposes for which it was disclosed, except as otherwise required or permitted by law. Before sharing any Personal Information with third-party service providers, we conduct a thorough due diligence process to ensure they adhere to equivalent standards of data protection and confidentiality. We ensure that such third parties will be bound by terms no less protective than those described in this Privacy Policy, or those we are subject to under applicable data protection laws.

4.2. DISCLOSURES TO LEGAL AUTHORITIES

We may share your Personal Information with law enforcement, data protection authorities, government officials, and other authorities when:

- Compelled by subpoena, court order, or other legal procedure.
- We believe that the disclosure is necessary to prevent physical harm or financial loss.
- Disclosure is necessary to report suspected illegal activity.
- Disclosure is necessary to investigate violations of this Privacy Policy or any other agreement with you.

4.3. INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION

We store and process your Personal Information in data centers around the world, wherever our facilities or service providers are located. As such, we may transfer your Personal Information between such data centers. Such transfers are undertaken in accordance with our legal and regulatory obligations and are performed only via protected channels.

4.4. OTHER CIRCUMSTANCES FOR DISCLOSURE OF PERSONAL INFORMATION

We can also disclose your Personal Information in the following circumstances:

- with your consent or at your instruction. Certain information you may choose to share may be displayed publicly, such as your username and any content you post when you use interactive areas of our Website like our online forums;
- with our current or future parent companies, affiliates, subsidiaries and with other companies under common control or ownership with us or our offices internationally. We ensure that listed parties will be bound by terms not less protective those described in this Privacy Policy, or those we are subject to under applicable data protection laws;
- if the sharing of Personal Information is necessary for protection of our rights and property, or rights and property of the above listed current or future parent companies, affiliates, subsidiaries and with other companies under common control or ownership with us or our offices;

5. EXTERNAL WEBSITES

Occasionally, the Website may provide references or links to other websites operated by third parties ("External websites"). We do not control these External websites or any of the content contained therein. You agree that we are in no way responsible or liable for External websites referenced or linked from our Website, including, but not limited to, website content, policies, promotions, products, services or actions and/or any damages, losses, failures or problems caused by, related to, or arising from those sites. External websites have separate and independent privacy policies. We encourage you to review the policies, rules, terms, and regulations of each site that you visit. We seek to protect the integrity of our site and welcome any feedback about External website information provided on our Website.

6. YOUR RIGHTS REGARDING YOUR PERSONAL INFORMATION

You have the right to access your Personal Information to correct, update, and block inaccurate and/or incorrect data. To exercise this right, contact us at info@b2prime.com. Within 40 days of receipt of your written request we will provide you with your Personal Information, including the purposes for which it was used and to whom it was disclosed to in accordance with applicable legislation. We reserve the right to request any additional information from you that may be necessary to provide a full response to your request, in accordance with applicable legislation.

Please note that if we are unable to verify your identity by e-mail messages or at your application to the call center, or in the case of reasonable doubts concerning your identity, we may ask you to provide a proof of identity, including by personal appearance in our office. This is the only way we can avoid disclosing your Personal Information to anyone impersonating you.

In some cases, we will not be able to change your Personal Information. In particular, such cases can include the event when your personal information has already been used during the execution of any agreement or transaction, or is specified in any official document, etc.

You have the right to withdraw your consent to personal data processing. You may also exercise your right of erasure (right to be forgotten). In such cases, we will delete your Personal Information we process, except for those Personal Information which we are obliged to store in accordance with the requirements set forth by the applicable legislation.

Please be advised that in case of realization of your right of withdrawal of consent to personal data processing or right to be forgotten, we may not be able to provide you our products or services, and we have a special right to terminate all our current agreements with you, including all legal consequences of such termination, and you irrevocably acknowledge such right.

In order to withdraw your consent to personal data processing and/or exercise your rights to be forgotten, please contact us at info@b2prime.com. Furthermore, in this case, for the purposes of safety, we may request you to present your ID document, including directly at our office.

7. SECURITY OF PERSONAL INFORMATION

We use a variety of security measures to ensure the confidentiality of your Personal Information, and to protect your Personal Information from loss, theft, unauthorized access, misuse, alteration or destruction. These security measures include, but are not limited to:

- Password protected directories and databases.
- Secure Sockets Layered (SSL) technology to ensure that your information is fully encrypted and sent across the Internet securely.
- Limited access to hosting servers using 2FA and traffic encryption
- All financially sensitive and/or credit information is transmitted via SSL technology and encrypted in our database. Only authorized personnel are permitted access to your Personal Information, and these personnel are required to treat the information as highly confidential.



These security measures will be reviewed regularly in light of new and relevant legal and technical developments.

We keep personal data physically/on paper and electronically.

8. BREACH AND SECURITY INCIDENTS

Breach of security leads to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed. We are responsible for ensuring immediate action in the event of a security incident or personal data breach.

We have in place procedures to deal with any suspected personal data breach and we will notify you and the relevant competent regulator for the breach where we are legally required to do so. If you require further information on how we deal with a data breach, please contact us at info@b2prime.com

9. CHILDREN

No one under 16 years of age is authorized to use the Website and we do not intentionally process personal data from anyone under the age of 16. If we become aware that we have inadvertently collected Personal Information from an individual under the age of 16 without verified parental consent, we will take immediate steps to delete the data from our records. Parents or guardians who believe their child has provided us with Personal Information without their consent should contact us at info@b2prime.com

10. RETENTION OF PERSONAL INFORMATION

We retain different types of Personal Information for varying periods depending on legal and regulatory obligations:

- Contact and Account Information: Retained for the duration of the user's relationship with the company and for a period of 7 years post-termination.
- Financial Information: Retained for 7 years following the closure of an account to comply with anti-money laundering (AML) and tax reporting requirements.
- Communication Records: Retained for 7 years in accordance with regulatory requirements.
- Identity Verification and KYC Data: Retained for a minimum of 7 years after the end of the business relationship.

11. CONTACT US

Please contact us with questions, comments, concerns or complaints regarding our Privacy Policy and/or practices at info@b2prime.com

12. COMPLAINTS

If you are unsatisfied with our response to your concerns or complaints, you have the right to lodge a complaint with us in line with the Complaint Handling and Processing Policy, or with the Information Commission of the Seychelles, more information about which can be found on their website.

13. VALIDITY

This Privacy Policy is effective this 1st day of March 2025, until revoked or amended by us.

We reserve the right to change or amend this Privacy Policy without further notice to you, provided that the changes do not significantly reduce your rights under this Privacy Policy. We recommend you to review this Privacy Policy frequently in order to stay updated about any possible changes. If we make material changes to this Privacy Policy, then you will be notified by means of a notice on the Website.

Any revised Privacy Policy will be effective immediately upon posting on the Website.

The latest and prevailing version of this Privacy Policy will at all times be available on the Website.