



## Privacy Policy Notice September 2025

### 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](http://www.b2prime.com) (hereinafter the "Website"). The website is owned and operated by B2B PRIME SERVICES MENA LIMITED, (hereinafter the "Company", "we", "us", "our" as appropriate).**

This Privacy Notice applies to all personal data relating to identifiable individuals ("Data Subjects") that we collect and process through our Website [www.b2prime.com](http://www.b2prime.com) and in the course of our regulated activities. The Website is operated by **B2B Prime Services MENA Limited** ("the Company", "we", "us", "our"), a DIFC-registered entity authorised and regulated by the **Dubai Financial Services Authority (DFSA)**.

By using our Website or engaging with us, you acknowledge that you have read and understood this Privacy Notice. If you do not wish your data to be processed in accordance with these terms, you should refrain from submitting personal information.

### 2 POLICY STATEMENT

We are committed to complying with all applicable data protection obligations under the DIFC Data Protection Law No. 5 of 2020 ("DP Law 2020"), the associated Regulations, and the relevant DFSA Rulebooks, including obligations relating to the fair treatment of clients, confidentiality and safeguarding of client information. This Privacy Notice explains how we collect, use, store, disclose and protect your personal data, and outlines your rights under DIFC law.

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 MENA Limited, incorporated in the DIFC and licensed by the DFSA, must collect and use personal data of Website visitors, potential clients, active and former clients, and other individuals who interact with us. The processing of such data is undertaken strictly in accordance with DP Law 2020 and our regulatory obligations.

Personal data refers to any information relating to an identified or identifiable natural person, including identifiers such as a name, identification number, online identifier, or other factors specific to that individual.

### 4 PROCESSING OF PERSONAL DATA

We collect and process personal data on lawful grounds, including: compliance with our legal and regulatory obligations; the performance of a contract or steps taken prior to entering into a contract; protection of our



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legitimate interests; and, in some cases, based on your consent.

The data collected may include identity documents, contact information, financial and professional details, information about trading activity, risk profile, communication records, and technical data such as IP addresses.

We may also obtain information from third parties, such as introducers, service providers, regulators, or public sources.

Personal data is used to verify identity, construct client profiles, perform due diligence, monitor transactions, provide services, comply with regulatory obligations, and manage our relationship with you. We take appropriate measures to ensure security and confidentiality at all times.

## **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**

We retain personal data for as long as necessary to fulfil the purposes for which it was collected and in compliance with legal and regulatory requirements. As a DFSA-regulated firm, we are required to retain client records for at least six (6) years from the termination of the business relationship, or longer if required by law. Once this period expires, data will be securely deleted or anonymised..

## **7 SUBJECT TO CONSENT**

By using our Website, registering with us, or providing us with personal data, you consent to the collection, processing, storage and disclosure of your information in line with this Privacy Notice. You may withdraw your consent at any time by contacting us, though please note that in some cases processing is required for us to provide services or comply with regulatory obligations.

## **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**

Under the DIFC DP Law 2020, you have a number of rights, including the right to access your personal data, to request rectification of inaccuracies, to request erasure under certain circumstances, to restrict processing, to object to processing (including marketing), to request portability of your data, and not to be subject to automated decision-making that significantly affects you.

These rights may be subject to exemptions where necessary for compliance with legal or regulatory requirements. You may exercise your rights by contacting us at [dpo@b2prime.com](mailto:dpo@b2prime.com).



## 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 COMMUNICATIONS

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 maintain procedures for responding to personal data breaches. In the event of a breach that is likely to result in a risk to your rights and freedoms, we will notify you and the DIFC Commissioner of Data Protection in accordance with DP Law 2020.

## 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](mailto: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 in line with DIFC requirements. The DPO monitors compliance, provides staff training, and serves as the point of contact for both data subjects and the DIFC Commissioner of Data Protection. You may contact the DPO at [dpo@b2prime.com](mailto:dpo@b2prime.com).

## **19 VALIDITY**

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



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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).

We may disclose your personal data where required by DIFC or UAE law, DFSA regulations, court order, or government authority. While we apply strict security measures, we are not responsible for any unauthorised use of your data resulting from your own actions (such as password misuse).