

A low-angle, upward-looking photograph of several modern skyscrapers with glass facades, creating a sense of height and urban density. The buildings are rendered in a dark, monochromatic style, with the sky appearing as a light gray background.

DIRECTPRIME

PRIVACY POLICY

[DIRECT-PRIME.COM](https://direct-prime.com) [INFO@DIRECT-PRIME.COM](mailto:info@direct-prime.com)

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PRIVACY POLICY

© 2022 DIRECT PRIME LTD. ALL RIGHTS RESERVED.

We show regard for our Clients' ("**Client**," "**you**," "**your**") security and comply with the applicable laws and regulations regarding handling personal data. On that account, this Privacy Policy (referred to herein as the "**Policy**") contains the practices of Direct Prime Ltd. ("**Direct Prime**," "**Company**," "**we**," "**us**," "**our**") when processing personal data.

Covered herein are our procedures for collecting, using, and disclosing personal data to maintain secure business operations with our Clients.

You should not use our Services if you disagree with the terms of this Policy, including other policies and arrangements that supervise your use of our Services.

For the purpose of this Policy, "**personal data**" refers to the information or documents that we collect from you, including the automatically collected information when you access our Site or use our Services.

For the purpose of this Policy, "**process**" or "**processing**" refers to the actions involving personal data, such as when it is obtained, stored, used, disclosed, restricted, erased, disposed of, and blocked.

Additionally, "**Site**" refers to our official website Direct-Prime.com, and "**cookies**" refer to the small text files that can be stored on your device when you visit our Site. More information about our use of cookies is outlined hereunder.

Changes to this Policy

This Policy is subject to changes at the Company's discretion. Any amendments or modifications to this Policy can be effective immediately without prior notice.

We advise that you read this Policy regularly to keep yourself updated with our current privacy terms and so that you can make informed decisions when accessing our Site and using our Services. In line with that, you acknowledge that your continued use of our Services may imply your acceptance of the applicable changes herein.

DIRECTPRIME

The financial market is volatile in nature, which may work to your advantage or disadvantage. Due to the significant risks of trading derivatives and other leveraged products, you should only conduct transactions with us if you understand the nature of the contracts you enter into. You should carefully assess the extent of your risk potential and consider whether trading is appropriate for you based on your experience, objectives, risk appetite, and other relevant factors.

Client suitability for processed personal data

As stated in our Terms of Use, you must be at least 18 years old to use our Site and Services. Any user under the age of 18 or otherwise the age your applicable jurisdiction law defines as a minor is not allowed to use our Services, nor do we knowingly collect personal information from underage users. If we identify underage users, we have the right to restrict access and use, and we will remove any collected data from such persons.

Processing of personal data

Activities that require your personal data will require your consent. However, you acknowledge that if you do not provide certain information or document, it may prevent us from carrying out our full Services, and we might be unable to complete some transactions. In such a case, you accept that your access and use of our Services may be limited if you decide not to provide certain information or document, where we have the right to cancel or reject transactions that require such data.

Methods of collecting personal data

We employ different methods when obtaining personal data, which can either be automatically collected or voluntarily provided by the Client. Voluntary data refers to any information or document you knowingly and actively provide us. Such methods include, but are not limited to when you:

- a) Sign up for an account and fill in the registration form
- b) Fill in electronic forms on our Site and other forms related to our Services
- c) Upload information or documents on the Site's client dashboard
- d) Avail, purchase, or use any of our offered products and Services
- e) Conduct an attempted or successful financial transaction
- f) Participate in our surveys or questionnaires
- g) Provide feedback
- h) Subscribe to our newsletter
- i) Participate in our contests, promotions, and similar Services
- j) Contact us via our available communication means, such as phone calls, email, live chat, and social media platforms

On the other hand, automatically collected data refers to the information automatically sent by your used device when accessing our Site and Services.

Types of personal data that we process

You agree that we may collect personally identifiable information that can be used to create, maintain, and identify your trading account with us, and we may also use your contact information to provide our offered Services. Additionally, personally identifiable information may be required to complete your profile and account verification, including but not limited to your:

- a) Full name
- b) Date of birth
- c) Phone number

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- d) Email
- e) Address
- f) Gender
- g) Marital status
- h) Nationality and citizenship information

Once you have created an account with us, we may ask you to provide additional information for us to provide the appropriate Services. You agree that we may require you to disclose information related to trading, such as but not limited to:

- a) Employment information such as occupation and source of income
- b) Financial capabilities
- c) Financial objectives
- d) Investment portfolio
- e) Source of investments

In compliance with our Know-Your-Customer ("**KYC**") Policy and for further identification, we may require you to provide copies of personal documents, such as:

- a) Passport and other identification cards, including license and national ID
- b) Proof of address, including utility bill and statement
- c) Copies of the used cards to fund your account

Kindly refer to our KYC Policy for more information about the required documents.

On the other hand, we may collect some information from the device you use when you visit our Site and interact with our Services. You accept that we may gather and review user information or log data by your used browser and, depending on your cookie settings, such as:

- a) Your public IP addresses
- b) Type of browser or operating system and its version
- c) Preferred language based on your settings
- d) Geo-location settings
- e) Time-zone settings
- f) Plug-ins and other device settings
- g) Date and time of your Site visit
- h) Pages you visit on our Site
- i) Time spent on each page
- j) Error logs you encounter
- k) Account login details

Some of the mentioned information may not be considered personal data if it cannot be used to identify you personally.

We may combine your personal data with information we already have or obtained from other sources. Furthermore, you acknowledge that we may use your personal data for more than one purpose, enabling us to share such information with our affiliates if applicable.

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Purposes for processing personal data

Automatically collected data can be used to monitor our Site's security, including our networks and systems. Among other potential uses, we may use such information to review specific trends and statistics, including fixing errors you may encounter and preventing Site misuse.

We may not personally identify you or your browsing activities with such automatically obtained information, except when it is out of a legal obligation or if your usage is causing disruptions to the Site, including unauthorized access, which must be resolved immediately.

We process personal data for the following purposes accordingly:

- a) Create and maintain your account with Direct Prime
- b) Allow you to log in to your account
- c) Respond to and assist you with your inquiries, requests, and other concerns related to our Services
- d) Verify your identity
- e) Execute checks that we are required to conduct by the applicable laws and regulations, such as KYC, anti-money laundering, fraud, sanctions, and politically exposed person ("PEP") checks
- f) Participate in crime prevention and regulatory compliance
- g) Set up security measures to protect your account, including two-factor authentication
- h) Contact you regarding your account, including requesting additional information or document
- i) Contact you on matters related to our Services, including general updates, market updates, and other offered Services
- j) Provide you with the appropriate Services we offer
- k) Administer transactions such as deposits, withdrawals, and chargebacks, and detect inconsistencies or errors in such transactions
- l) Monitor trading transactions and detect prohibited activities
- m) Execute our business and administrative operations
- n) Maintain our Service operations, including back-office duties and monitoring measures
- o) Conduct suitability or appropriateness assessments for using our Services
- p) Assess your credit risk and risk appetite according to the criteria we set
- q) Assess qualifications whether you can be categorized as a professional client or other specific categories of clients
- r) Improve our Services, including tailoring our offered Services according to the Client's
- s) Develop and market other products and Services
- t) Enhance user experience on our Site
- u) Protect our interest from fraud and unauthorized use of the Site and Services
- v) Transfer your data to the relevant third parties when necessary
- w) Comply with the applicable laws, regulations, contracts, and other legal obligations, including investigating, pursuing, exercising, or defending legal claims

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Retention of personal data

We only store the collected personal data for as long as necessary for its originally obtained purpose. However, we have the right to keep personal data if it is out of a legal obligation, including when complying with regulations, contracts, policies, and other legitimate purposes. The period of storing personal data may vary depending on the purpose for collecting such information or document.

Disclosure of personal data

The Company does not share any collected data and records except for business purposes, where we have the right to disclose the personal data to the following parties accordingly:

- a) Among the Company's entity, including our current and future parents, subsidiaries, affiliates, and other companies under common control and ownership
- b) Existing or potential agents or business partners
- c) Existing or potential buyers of our assets, business, and Company
- d) Credit reporting agencies and regulatory authorities
- e) Public authorities and other applicable regulatory bodies to meet national security or law enforcement requirements

Personal data can also be disclosed to our third-party service providers, including:

- a) Payment service providers ("PSPs")
- b) Applicable banks and financial institutions who need access to the relevant Client data to execute business responsibilities on our behalf or as related to our Services
- c) Website and IT hosting firms
- d) Maintenance and troubleshooting operators
- e) Marketing affiliates and vendors

Third-party services and limits of our Policy

Our Site, software, and mobile applications may contain third-party programs, websites, and links, including third-party ad-serving platforms, where these third parties may use cookies and other technologies to collect your data. Consequently, you accept that the privacy terms of such third parties are separate from ours, and we have no control and responsibility over their use of and access to your information. Accordingly, this Policy does not apply to your activities outside our Site.

Use of cookies

As mentioned above, cookies are small text files that can be stored on your device when you visit our Site. We use different technologies that may obtain your data, such as cookies and web beacons, to understand how you use the Site and recognize returning visitors.

These cookies are safe and cannot run programs or transfer harmful viruses. Cookies only help us provide content based on your device or browser's specified preferences, so you can have a more

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tailored experience when using our Site and Services. More specifically, we only use cookies for the following reasons:

- a) Optimize trading experiences, such as remembering your preferred language, location, browser settings, and other preferences
- b) Retrieve data you previously entered, such as login details and other personalized features
- c) Maintain Site functions and other contents
- d) Authenticate identity for security purposes
- e) Assess and manage your use of our Site and Services

You may accept, decline, block, and remove cookies as your browser or device permits. While most web browsers automatically accept cookies, you can change it on your browser's settings. You can still access our Site if you choose to remove or decline our cookies. However, you may not be able to use some of the Site's features, or they may not work as intended, which may prevent you from getting a complete or proper user experience.

Social trading features

Further to our Services, Clients may choose to access the real-time social trading platform, which integrates rich community and social features into the trading platform. Using such Service constitute your acknowledgment that your general information shall be considered non-confidential and non-propriety information.

As part of our traders' network, Clients who opt to be a part of the community can share their strategies and performance with other traders. The traded amount is never disclosed, and all participants must consent to the relevant terms to be a part of such a network.

If you use any information provided in the social trading features for your trades, you are solely responsible for the outcome, regardless of whether the result is to your advantage or disadvantage. You agree that we are not liable for any loss or damage upon using this feature.

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