PRIME XBT

PAIA & PRIVACY POLICY

Version 11.

PAIA & PRIVACY POLICY

Introduction

Company Overview:

PrimeXBT (PTY) LTD is an authorised financial services provider in South Africa with license number 45697, with registration no. 2013 / 099697 / 07 and having its registered address at 180 Lancaster Road, Gordons Bay, Gordons Bay, Western Cape, 7140 (hereinafter referred to as "the Company"). PrimeXBT (PTY) LTD acts as an intermediary between the investor and the market maker which is the counterparty to the products purchased through PrimeXBT.

The Company is not the market maker or product issuer and acts solely as an intermediary in terms of the FAIS Act between the client and the liquidity provider ("the Market Maker"), rendering only an intermediary service (i.e., no market making is conducted by the Company) in relation to the products offered. Therefore, the Company does not act as the principal or the counterparty in any of its transactions.

At the Company, we are committed to maintaining the confidentiality and proper handling of personal data. This PAIA & Privacy Policy ("Policy") outlines how we manage and protect the personal information ("Personal Data") of our clients. By using our websites, Trading Platform, and other services (collectively, the "Services"), you ("User" and "Client") consent to the practices described in this Policy.

1. Purpose of Collecting Personal Information

1.1. The Company collects and processes Personal Data necessary for fulfilling our contractual and legal obligations, provided to us directly by you for processing your request for opening a trading account or using any other of our Services.

1.2. You approve and agree that the Company might request personal details from you as listed in the present Policy which might include, inter alia, your name, surname, identification number (as shown on your passport, driver's license, national identity card, or any other identification document accepted by the Company), email, phone number, and details about your trading experience. If you choose not to provide the information needed to fulfill your request for a specific product or service, we may not be able to provide you with the requested product, service or allow you enter a specific promotion and/or waitlist.

1.3. We may deliver, personalise, and improve our Services by combining and using the information we have about you (including information we receive on and off our Services) to understand how you use and interact with our Services and the people or things you're connected to and interested in.

1.4. We may also use the information we have about you for the following purposes:

1.4.1. Provide, maintain, improve, and develop relevant features, content, and Services.

1.4.2. Fulfill your requests.

1.4.3. Research and develop new services.

1.4.4. Detect and defend against fraudulent, abusive, or unlawful activity.

1.4.5. Use your location to personalize content and serve targeted ads.

1.4.6. Send you technical notices, updates, security alerts, invoices, and other support and administrative messages.

1.4.7. Provide customer service.

1.4.8. Communicate with you about products, services, offers, promotions, and events, and provide other news and information we think will be of interest to you.

1.4.9. Use your telephone number and wallet address to implement transactions.

1.4.10. Use your email address to carry out mailings with your consent.

1.4.11. Personalise the Services and provide advertisements, content, and features that match user profiles or interests.

1.5. We collect general anonymous analytical information on the use of the Services for optimisation purposes.

2. What Personal Data We Collect and Store

2.1. As part of our business, we may collect, use, store, and transfer different kinds of personal data about you:

2.1.1. **General Information:** We collect unique identifiers, browser type and settings, device type and settings, operating system, mobile network information, including operator name and phone number, and application version number. We also collect information about the interaction of your browsers and devices with our services, including OS, IP address, specifications, and the date, time, and referrer URL of your request.

2.1.2. **Customer-Specific Information:** To create an account, you must provide a username, email, and password. We may also request information such as:

- Name, surname, and contact details.
- Date of birth and gender.
- Information about your income and wealth, including details about your assets and liabilities, account balances, trading statements, tax and financial statements.
- Occupation and employment details.

- Location data.
- Knowledge and experience in trading, risk tolerance, and risk profile.
- IP address, device specifications, and other information relating to your trading experience.
- Identification number (as shown on your passport, driver's license, national identity card, or any other identification document accepted by the Company).

The information and documentation required by the Company, as outlined in this Policy, may be requested during the account opening process, upon depositing, or at any point during the business relationship with the Company.

2.1.3. **Actions You Take:** We collect information about the actions you take when using the Services, including products you trade with us, historical data about the trades and investments you have made, and your preference for certain types of products and services. It also includes your interactions with other users or projects.

2.1.4. **KYC Documents:** Anti-money laundering laws may require us to sight and record details of certain documents to meet the standards set under those laws. Identification documentation relevant to the services we provide may include:

- Passport
- Driver's license
- National identity card (if applicable)
- Utility bills
- Source of funds confirmation
- Other documents or information necessary for the KYC procedure

2.1.5. **Other Information:** You may choose to provide other information directly to us, for example, when you request customer support or otherwise communicate with us. You may provide us with your email to receive mailings and confirm transactions.

2.1.6. **Location Information:** We may receive and process information about your location.

2.1.7. **Additional verification information**The Company may request additional information or documentation from Clients where necessary for identity verification, security purposes, or to comply with applicable legal and regulatory obligations. Such information may include photographs, screen recordings, or video recordings demonstrating the use of a banking application, payment method, or other financial account used in connection with the Client's account, in order to verify payment method ownership, confirm transaction details, and ensure the proper operation and security of the Company's services.

2.2. We may receive personal data about you from various third parties and public sources:

2.2.1. Analytics providers such as Google, based outside the EU.

2.2.2. Advertising networks.

2.2.3. Information providers.

3. How We Use Cookies

3.1. Our website uses cookies to distinguish you from other users. This helps us provide you with a good experience when you browse our website and allows us to improve our site.

3.2. By visiting the Company's website, you agree to our use of cookies for the purposes set out above.

3.3. For more information, please see our Cookie Policy available on our website.

4. How We Use Your Personal Information

4.1. We use information held about you in the following ways:

4.1.1. To carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products, and services you request.

4.1.2. To provide you with information about other products and services we offer similar to those you have already purchased or enquired about.

4.1.3. To provide you, or permit selected third parties to provide you, with information about products or services we feel may interest you.

4.1.4. To notify you about changes to our service.

4.1.5. To ensure content on our website is presented in the most effective manner for you and your computer.

4.1.6. To administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.

4.1.7. To improve our site to ensure content is presented in the most effective manner for you and your computer.

4.1.8. To allow you to participate in interactive features of our service when you choose to do so.

4.1.9. To keep our site safe and secure.

4.1.10. To measure or understand the effectiveness of advertising we serve to you and others and to deliver

relevant advertising.

4.1.11. To make suggestions and recommendations to you and other users about goods or services that may interest you or them.

5. Disclosure of Your Personal Information

5.1. You agree that we have the right to share your personal information with:

5.1.1. Third-party app providers when you use our apps, communication systems, and trading platforms provided by third parties.

5.1.2. Service providers and specialist advisers contracted to provide us with services such as administrative, IT, analytics, online marketing optimisation, financial, regulatory, compliance, insurance, research, or other services.

5.1.3. Introducing brokers and affiliates with whom we have a mutual relationship.

5.1.4. Payment service providers and banks that process your transactions.

5.1.5. Auditors, contractors, or other advisers auditing, assisting with, or advising on any of our business purposes.

5.1.6. Courts, tribunals, and applicable regulatory authorities as agreed or authorized by law or our agreement with you.

5.1.7. Government bodies and law enforcement agencies whenever required by law and in response to legal and regulatory requests.

5.1.8. Any third party where such disclosure is required to enforce or apply our Terms and Conditions or other relevant Agreements and Policies.

5.1.9. Anyone authorised by you.

5.1.10. Execution venues, liquidity providers, and counterparties, to the extent necessary to facilitate the provision of services to you, including the execution, clearing, and settlement of transactions, risk management, and other operational requirements necessary for us to offer you our services.

5.2. We engage service providers to perform functions and provide services to us. For example, we use various third-party services to help operate our services and understand their use, such as Google Analytics. We may share your private personal data with such service providers subject to obligations consistent with this PAIA & Privacy Policy and any other appropriate confidentiality and security measures, and on the condition that the third parties use your private personal data only on our behalf and pursuant to our instructions. We share your

payment information with payment services providers to process payments; prevent, detect, and investigate fraud or other prohibited activities; facilitate dispute resolution, such as chargebacks or refunds; and for other purposes associated with accepting credit and debit cards.

5.3. We may partner with third-party advertisers and ad networks to deliver advertising and content targeted to your interests and better understand your use of the Services. These third parties may collect information sent by your computer, browser, or mobile device in response to a request for content, such as unique identifiers, your IP address, location, or other information about your computer or device.

5.4. If you submit personally identifiable information to us through the Company's Services, we may use your personal information to operate, maintain, and provide features and functionality of our website, app, and other services.

5.5. Other information that does not personally identify you as an individual is collected by the Company (such as, by way of example, patterns of use) and is exclusively owned by the Company. We can use this information in such a manner that the Company, in its sole discretion, deems appropriate.

5.6. We may share specific aggregated, non-personal information with third parties, such as the number of users registered with us, the volume and pattern of traffic to and within the website, etc. That information will not identify you, the individual, in any way.

5.7. As mentioned above, when you send us messages, we can keep them for administering your inquiries and improving our services. We shall not transfer information from such messages to third parties.

5.8. Our websites or apps may have links to external third-party websites. However, third-party websites are not covered by this privacy notice, and those sites are not subject to our privacy standards and procedures. Please check with each third party regarding their privacy practices and procedures.

5.9. We may also use third-party service providers to help us collect feedback and reviews about our Services and to improve our products, services, and customer experience. For this purpose, we may share limited personal data with such providers, for example your email address to enable the feedback or review process.

5A. Sharing of Information with Approved Partners for Support Purposes

5A.1. The Company may share limited personal information with its approved partners or otherwise contracted by the Company to provide **client support, education services** and other service-related information about your account.

5A.2. Such partners may contact you **by telephone, email, or electronic message for support purposes**, including:
(a) assistance with **account registration and verification**,

(b) guidance on **deposit procedures and platform navigation**, and
(c) responding to general or technical queries regarding the Company's services or providing other service-related information about your account..

5A.3. The categories of information shared are **your name, surname, and telephone number**, and, where necessary, your email address to facilitate the permitted contact.

5A.4. By registering an account with the Company, you acknowledge, agree, and accept that the Company may share your information as described in this Section 5A for registration assistance, support purposes, and other service-related communications concerning your account.

5A.5. You may request at any time that such sharing or contact be discontinued by contacting the Company at support.za@primexbt.com.

6. How We Store Your Personal Data

6.1. We hold personal information in a combination of secure computer storage facilities and paper-based files and other records and take steps to protect the personal information we hold from misuse, loss, unauthorized access, modification, or disclosure.

6.2. When we consider that personal information is no longer needed, we will remove any details that will identify you or securely destroy the records.

6.3. However, we may need to maintain records for a significant period. For example, we are subject to investment services and anti-money laundering laws, which require us to retain copies and evidence of the actions taken by us regarding your identity verification, sources of incomes and wealth, monitoring of your transactions, telephone, chat and email communications, orders and trades history, handling of your complaints and records that can demonstrate that we have acted in line with regulatory code of conduct throughout the business relationship. These records must be maintained for seven years after our business relationship with you has ended or even longer if there is a regulatory reason requiring us to keep them for a longer period.

6.4. Personal data provided by you as a prospective client during account opening registration, in case the registration was never completed or your account opening application was rejected, will be maintained for six months unless there is a regulatory reason requiring us to keep it for a longer period.

6.5. Where you have opted out of receiving marketing communications, we will hold your details on our suppression list so that we know you do not want to receive these communications.

6.6. The data that we collect from you may be transferred to and stored at a destination outside South Africa("SA"). It may also be processed by staff operating outside SA who work for us or for one of our suppliers or affiliate companies. We will take all steps reasonably necessary to ensure that your data is treated securely

and in accordance with this PAIA & Privacy Policy.

6.7. When we transfer your data to other third parties outside SA, we may in some cases rely on applicable standard contractual clauses, binding corporate rules, the EU-US Privacy Shield, or any other equivalent applicable arrangements.

6.8. If you would like a copy of such arrangements, please contact us using the contact details below.

6.9. Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to prevent unauthorized access.

7. How We Protect Your Personal Data

7.1. We are committed to safeguarding and protecting personal data and will implement and maintain appropriate technical and organiSational measures to ensure a level of security appropriate to protect any personal data provided to us from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored, or otherwise processed.

7.2. We provide the following safety measures regarding the protection of your Personal Identification ("PI"):

7.2.1. Evaluation of the effectiveness of used security measures, prior to the launch of the website and its updates.

7.2.2. Establishing rules to access personal data processed by the website, as well as ensuring registration and recording of all actions performed with PI in the information systems of the website.

7.2.3. Detection of unauthorised access to PI and the adoption of appropriate response measures.

8. Your Data Privacy Rights

8.1. Under the applicable regulatory framework, your data subject rights include the following:

8.1.1. **Your Right to Be Informed:** You have the right to be informed as to whether we hold any personal data and can request a copy of this information.

8.1.2. **Your Right of Access:** You have the right to ask us for copies of your personal information.

8.1.3. **Your Right to Rectification:** You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

8.2. Please complete the personal data request by email using the registered email address you disclosed to us, to

the following email address: support.za@primexbt.com.

8.3. We try to respond to all requests within seven business days. Occasionally, it may take us longer than seven business days if your request is particularly complex or you have made a number of requests.

8.4. We may charge you a reasonable fee when a request is manifestly unfounded, excessive, or repetitive, or we receive a request to provide further copies of the same data. In this case, we will send you a fee request, which you will have to accept prior to us processing your request. Alternatively, we may refuse to comply with your request in these circumstances.

9. Miscellaneous

9.1. If the Company becomes aware of a security systems breach, we may attempt to notify you electronically so that you can take appropriate protective steps. The Company may post a notice on our website if the security breach occurs.

9.2. When a personal data breach is likely to result in a high risk to the rights and freedoms of users, the Company will inform you.

9.3. In the event that the Company is acquired by or merged with a third-party entity, we reserve the right, in any of these circumstances, to transfer or assign the information we have collected from our users as part of such merger, acquisition, sale, or other change of control. If we become involved in a merger, acquisition, or any form of sale of some or all of its assets, we will notify users before personal information is transferred and becomes subject to a different PAIA & Privacy Policy. In the unlikely event of our bankruptcy, insolvency, reorganization, receivership, or assignment for the benefit of creditors, or the application of laws or equitable principles affecting creditors' rights generally, we may not be able to control how your personal information is treated, transferred, or used.

10. Changes to Our PAIA & Privacy Policy

10.1. The Company reserves the right to amend this Policy from time to time. In case there is a material change to this statement, we will inform clients by publishing an updated version of this Policy on our website. The latest and prevailing version of the PAIA & Privacy Policy will, at all times, be available at our official website.

10.2. For any material changes in the PAIA & Privacy Policy, we may also notify you via an email to the email address associated with your account. The latest and prevailing version of the PAIA & Privacy Policy will, at all times, be available at our official website.

11. Contacting Us

11.1. If you have any questions about this PAIA & Privacy Policy, please feel free to contact our support team.

12. Contact Information for PAIA & Privacy Policy Inquiries

Should you have any questions regarding the contents of this PAIA & Privacy Policy, wish to notify us of any changes or corrections to your personal information, desire to exercise your rights under this policy, or intend to submit a complaint or comment, please reach out to us using the contact information provided below. It is imperative to utilize the prescribed forms for such requests. Access to these forms is available via the following links:

- POPIA Forms
- PAIA Forms