

**B2B PRIME SERVICES EU
LIMITED**
(EX MENASECURITIES LTD)

Privacy Policy Notice

November 2021

Vs 2.0

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 (EX MENASECURITIES LTD), (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 (EX MENASECURITIES LTD) 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 (EX MENASECURITIES LTD) 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.

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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.

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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 05 day of November, 2021, 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.

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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).

This "Privacy Policy Notice" was last updated on 05/11/2021