

PRIVACY NOTICE FOR THE PROTECTION OF PERSONAL DATA

September 2024

1. INTRODUCTION

G2 PRIME Ltd (hereinafter the “Company”), is committed to protect your privacy and handling your data through a transparent manner. The Company understands the importance of maintaining the confidentiality and privacy of your personal data.

The objective of this notice (hereinafter “Privacy Notice”) of Personal Data Protection is to provide information related to processing of personal data pursuant to provisions 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 repealing Directive 95/46/EC and Privacy and [Data Protection Act 2011](#) and the [Data Protection \(Amendment\) Act 2014](#) of Saint Lucia.

This Privacy Notice provides an overview of how the Company is Processing Personal Data of natural persons, what is the purpose of this processing, whom the personal data may be provided to, what your rights are, as well as information where you can contact the Company in case you have a question related to processing of your personal data. This Privacy Notice is directed and applies to you in cases where:

- you are either a current or potential customer of the Company (including if you have expressed your interest in the Company’s products/ services),
- you represent a customer of the Company,
- you are authorised representatives/agents/introducers/statutory directors/ secretary/ contact persons or shareholders/beneficial owners of legal entities which have a business relationship with the Company,
- you have provided or are requested to provide references for a customer of the Company,
- you are connected with a customer or a member of staff or a business associate of the Company and your Personal Data is provided under a regulatory obligation (e.g., to manage possible conflicts of interest and other regulatory obligations),
- you now have or had any business relationship with the Company in the past including being a shareholder or bondholder,

- your Personal Data have or may in the future be lawfully obtained by the Company in the normal course of its business.

2. BASIC TERMS

GDPR

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.

Personal Data

Any information relating to an identified or identifiable natural person ('data subject') such as name, identification number, location data, online identifier or one or several elements specific for physical, physiological, genetic, mental, economic, cultural or social identify.

Data Subject

Natural person whose personal data are processed. It is a person who can be identified directly or indirectly, especially with reference to the identifier such as name, identification number, online identifier or one or several elements specific for physical, physiological, genetic, mental, economic, cultural or social identify of this natural person.

Processing

Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Anti Money Laundering

Prevention of legalization of proceeds from criminal activity and financing of terrorism.

Client filing system

Organised set of personal data processed by the Company for the following purpose: Provision of the services, financial and related services, identification of the Company's clients and identification of the Company's contract partners.

Marketing filing system

Organised set of personal data processed by the Company for the following purpose: Informing about products, innovations and services provided by the Company in connection with obtaining benefits from the Company.

Controller

Any person who, alone or together with other parties, determines the purposes and means of personal data processing and processes personal data on their behalf. For purposes hereof the controller is the Company.

Processor

Any person who processes personal data on behalf of the controller on basis of authorisation in compliance with Article 28 GDPR.

3. THE COMPANY

G2 PRIME LTD is an international business company, registered under Section 6 of the Cap 12.14 of the local law of St. Lucia with registration number 2024-00466 and registered address at Top Floor, Rodney Court Building, Rodney bay, Gros Islet, LC01 401.

If you have any questions or want more details about how the Company uses your personal information, you can contact us via email dataprotection@fxbmarkets.com.

4. WHAT PERSONAL DATA IS PROCESSED AND FROM WHICH SOURCES

Data type	Description
Identification data including national identification numbers	Information which can directly identify you such as name, surname, date of birth, gender, place of birth, citizenship and identification numbers or codes given or issued by a governmental service such as national social insurance number, tax identification code, ID number, Passport number, Driver's license number and other personal data of similar type.
Contact	Contact details such as telephone number, home address and email address.
Financial	Information on your personal wealth including your assets, details of the assets, streams of incomes, expected incomes, personal financial position, salary, economic status, account numbers, IBAN and other financial information. In case you receive or applied to receive investment services, financial data to be obtained include knowledge and experience with MiFID II products (i.e., shares, bonds, funds and interest rate/currency products), your investment strategy and scope, details of your personal investment portfolio, personal financial objectives.
Socio-	This includes details about your work or profession, nationality,

Demographic	education, marital status and where you fit into general social or income groups.
Transactional	Details about payments to and from your accounts with the Company.
Contractual	Details about the products or services we provide you with.
Locational	Data we get about where you are. Such data may come from your mobile phone, the address where you connect a computer to the internet.
Behavioral	Details about how you use our products and services.
Technical/Digital	Details of the devices and technology you use, your digital activity and systems logs which are captured by the Company's information technology systems when you use them, IP addresses and the credentials you use to connect to our digital platforms available.
Communications	What we learn about you from letters, emails and conversations/meetings between us.
Documentary	Details about you that are stored on documents in different formats, or copies of them. This could include things like your passport, identity card, driver's license or birth certificate.
Special categories of Personal Data	<p>The law treats some types of Personal Data as special. These include Personal Data concerning health and data relating to criminal convictions and offences.</p> <p>The Company may process data relating to criminal convictions and offences as part of the Company's initial and periodic review, as required by law. The legal basis used for such processing is the Legal Obligation (refer to section 5 below).</p>
Children's data	<p>For the purposes of this Privacy Notice, "children" are individuals who are under the age of eighteen (18).</p> <p>The Company may process Personal Data in relation to children only indirectly if they are provided along with other data/documents (e.g., name of the Child stated on the ID of the Client).</p>

The Company collects Personal Data from the following sources:

a) Directly from you:

- When you apply for the Company's products and services,
- When you talk to the Company on the phone or in physical presence

- When you use the Company's websites and FXB Market PORTAL (including mobile device application)
 - In emails and letters
 - When it is necessary in the context of the business relationship with you
- b) Indirectly, for example through:
- Persons providing references for you (e.g., Bank reference letter)
 - The legal entity you represent or in which you act as agent/ introducer / statutory director / secretary / contact person / shareholder / beneficial owner or any other role which is necessary for the execution of the Company's business operations with that legal entity.
- c) From other publicly accessible sources such as:
- Othe Registrar of Companies
 - The Bankruptcy Archive
 - Commercial registers
 - The Press/Media
 - The Internet
- d) Other resources such as:
- Other service providers such as banks and PSPs, for the purposes of receiving information necessary for our enhanced due diligence obligations under the AML Law.
 - Other financial institutions, card associations, companies that process payments such for the purposes of executing your payments

5. WHY WE PROCESS YOUR PERSONAL DATA

The law allows the Company to process Personal Data, including sharing Personal Data outside the Company, only if the Company has a proper reason to do so.

The Company may use your personal data for the following purposes ("Permitted Purposes"), based on the following legal grounds:

- a) **TO ENTER INTO OR PERFORM OUR AGREEMENT**
- To consider your application for account opening;
 - To carry our risk assessment;
 - To obtaining information about your relevant investment knowledge and experience so that we can assess whether the service is appropriate for you;
 - To provide services to you in accordance with the agreement(s) you or your organisation may have with us, for record-keeping and compliance procedures;
 - To perform financial transactions related to provided services such as deposits, withdrawals, chargebacks and other payments;

- To provide you or your organisation with brokerage and other services available on our platforms and/or to deal with any requests or inquiries you may have;
 - To respond to requests for information from you and to follow up afterwards to see if any further assistance is required.
- a) TO COMPLY WITH OUR LEGAL OBLIGATIONS
- To comply with any applicable laws in any country we operate in;
 - For the purposes of preventing and detecting money-laundering, terrorism, fraud or other crimes and/or abuses of our services;
 - To comply with any legal, regulatory or good practice requirement and to fulfil our obligations under any reporting agreement entered into with any tax authority or revenue services from time to time.
- b) TO PURSUE OUR LEGITIMATE INTERESTS
- For our own administrative and operational procedures;
 - For statistical purposes and for market research and product analysis and to develop and improve our products and services;
 - To carry out, monitor and analyse our business or operations including the activities set out in this Privacy Notice;
 - To enforce or apply any agreement and/or to protect our (or others') property or rights and to defend any potential claim;
- c) FOR MARKETING PURPOSES WITH YOUR CONSENT
- We may also process your personal data for the following purposes (after obtaining your express consent where such is legally required) in accordance with your preferences:
- To communicate with you through the channels you have approved so as to keep you up to date on latest developments, announcements and other information about the Company's services, products and technologies;
 - To conduct client surveys, marketing campaigns, market analysis or promotional activities;
 - To collect information about your preferences, to create a user profile to personalise and foster the quality of our communication and interaction with you (for example, by way of newsletter tracking or website analytics).
 - To conduct monitoring by us or any other person on our behalf using various methods.

Where legally required, we will not use your Personal Information for taking any automated decisions affecting you or creating profiles other than described above.

We will use your personal data for the purposes for which we collect it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose and the law (in which case your knowledge or consent for use thereof is not required). If you wish to get an explanation as to how the compatibility of the reason and the original purpose is determined, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you accordingly and explain the legal basis which allows us to do so. Please note that we may process your personal data where this is required or permitted by law.

6. WHO RECEIVES YOUR PERSONAL DATA

a) Within the Company

Within the Company, access to your Personal Data is given to those employees who require such access to perform the Company's contractual, legal obligations and other internal activities.

b) Outside the Company

Access to your Personal Data may also be given to **third party service providers** to enable more efficient and effective execution of its business operations, provided that an appropriate legal basis exists. Service providers appointed by the Company are required to follow the Company's instructions in relation to the Processing of Personal Data, provide written assurances that it processes the Personal Data in accordance with GDPR and the information shared will be restricted to the minimum necessary for the specified and explicit purposes.

These are mainly organisations from the categories listed below:

- Payment service agents and participating merchants
- IT systems/solutions providers and cloud service providers
- Advisory and professional service providers
- Auditing and accounting service providers
- Companies offering marketing services /advertising agencies
- Regulatory Authorities.
- Anyone authorized by you.
- Relevant authorities to investigate or prevent fraud, money laundering or other illegal activity.
- Trade Repository or similar.
- Record Keeping companies
- Providers of data screening services for anti-money laundering purposes
- Other service providers supporting any of the operations of the Company.

7. DATA RETENTION PERIOD

a) Existing relationships

The Company processes and stores your Personal Data as long as you are a customer of the Company and/or you maintain any type of relationship with the Company and such Processing is necessary for the performance of the Company's contractual obligations, including the period prior to the conclusion of the contract with you (i.e., pre-contractual arrangements) and other legal obligations.

b) Terminated relationships

After you stop being a customer of the Company or you stop maintaining any type of relationship with the Company, the Company may keep your Personal Data for a period of up to 10 (ten) years from the date of termination for the following reasons:

- To maintain records according to rules that apply to the Company such as under applicable tax and money laundering laws and regulations.
- To respond to any questions or complaints.

- To demonstrate if needed that the Company treated you fairly.
- To preserve evidence that may be needed for the establishment, exercise or defence of legal claims.

We may keep your Personal Data for longer than the said period if we cannot delete it for legal and/or regulatory and/or technical reasons. If we do so, we will ensure that your privacy is protected, and the Personal Data is used only for the purposes stated in Section 5 above. For example, by the expiration of the above period, there are on-going judicial proceedings with the Company concerning you directly or indirectly. In such a case the above period for the retention of the Personal Data will be extended until a final judicial decision is issued.

c) Prospect Client

In case you provide us with Personal Data for the purposes of becoming a customer of the Company but for any reason whatsoever you do not become a customer, we shall keep your personal information for a period of up to 1 (one) year from the date of notification of the rejection of your application for the Company's services, or from the date of withdrawal of such application.

d) Other provisions

In all respects, where a shorter or longer time period for the retention of Personal Data is provided for by law or regulatory acts, the retention period mentioned above will be reduced or increased accordingly.

8. CONSEQUENCES FOR REFUSAL TO PROVIDE YOUR PERSONAL DATA

Kindly note that if you do not provide the Company with the Personal Data which is legitimately required, then we will not be allowed / or be able to commence or continue our business relationship with you.

9. ORGANIZATIONAL AND SECURITY MEASURES

The Company has taken all the appropriate organizational measures to ensure that your personal data are secured. Moreover, the Company has established an Internal Educational Training for its employees. The employees that are processing your data are being trained to respect the confidentiality of customer information and the privacy of individuals. We consider avoiding of breaches of your privacy as top priority, and the Company will enhance its internal procedures to prevent any such event.

The Company has implemented procedures in respect to safeguarding your data. Access to your information has only employees that need to have access to the information in order to enable the continuity of the agreement between you and the Company.

Furthermore, the Company holds personal information in a combination of secure computer storage, secure servers and from time to time and if it is deemed necessary, it will be stored in paper-based files. The Company has taken all the necessary steps to protect the personal information that it holds from misuse, loss, unauthorized access, modification or disclosure.

Examples of security measures we use:

- SSL technologies for cryptographic
- PCI scanning for active protection of our server
- Cryptographic protection of databases
- Antivirus software

While we will use all reasonable efforts to safeguard Your Information, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data transferred from you, or to you via the internet.

10. WHAT ARE YOUR RIGHTS

Your data protection rights, granted by the GDPR, are described below. You may exercise them at any time by e-mailing us at dataprotection@fxbmarkets.com.

a) Right of Access

You have the right to be provided a copy of the personal information the Company has about you, as well as information about how the Company uses your personal information. In most cases, your personal information will be provided electronically. However, the way, how the right to access shall be fulfilled depends on the nature of personal data, the medium on which it is stored and with regards to the data protection of other subjects. If you require additional copies, we may charge you a reasonable administration fee.

b) Right to Erasure

You have the right to have the Company delete or remove your Personal Data in the following circumstances:

- The Processing of the Personal Data by the Company is no longer necessary for any of the reasons the Personal Data was collected and used.
- You have withdrawn your consent and there is no other reason for the Personal Data Processing.
- You have successfully objected to the Processing of the Personal Data by the Company.
- The Personal Data has been unlawfully processed.
- Deletion is required by law.

It is clarified that the Company reserves its right to deny the said erasure, if the Processing is necessary for the Company to comply with its legal obligation, for reasons of public interest and/or for the exercise of its legal claims.

c) Right to Obtain the Rectification of Inaccurate Personal Data

You have the right to question any Personal Data the Company holds about you that you think is wrong or incomplete. If you do, the Company will take reasonable steps to check its accuracy and correct it.

d) Right to restrict processing

Under certain conditions stipulated by the applicable legislation you have the right to request that the Company restrict the processing of your personal data.

e) Right to data portability

You have the right to request that the Company transfer the data that we have collected to another organization, or directly to you, under certain conditions.

f) Right to object to processing

You have the right to object the processing of your personal data at any time on grounds relating to your situation.

g) The Right to notify the Data Protection Authority (DPA)

If you believe that we are processing your personal data unfairly or unlawfully, you may file a complaint with the supervisory authority The Data Protection Commissioner of Saint Lucia or your local supervisory authority.

11. Automated decision-making and profiling

Generally, we do not make decisions about you based solely on an automated process (e.g. through automatic profiling) that affects your ability to use the services or has another significant effect on you. However, if we do so, you have the right to be informed on it and 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.

20. Update of this Data Protection Policy

The Company may revise or update this Privacy Notice from time to time. The new version of this Privacy Notice will be available on the Company's website.

In case of significant changes (such as in relation to the reasons for which the Company uses Personal Data or to the way in which you may exercise the rights described above), the Company will bring these changes to your attention.