

## PRIVACY POLICY

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## **1 INTRODUCTION**

- 1.1 Solitaire Prime Ltd. ("Solitaire Prime", "Company", "we", "us" or "our") is committed to protecting the privacy, confidentiality and security of personal information that we collect and process. This Privacy Policy explains how we collect, use, disclose, retain and protect personal data in connection with our website (<https://www.solitaireprime.com>), trading platforms, mobile applications, marketing activities, account opening and other services.
- 1.2 This Policy applies to all individuals whose personal information we process, including prospective and existing clients, website visitors, users of our platforms, employees, contractors, service providers and other third parties.
- 1.3 By accessing our website, registering for an account, using our services, or otherwise providing us personal information, you agree to the terms of this Privacy Policy.

## **2 SCOPE**

- 2.1 This Privacy Policy covers all personal information collected or processed by Solitaire Prime Ltd. in the course of its business operations, whether such information is collected online through our website at [www.solitaireprime.com](http://www.solitaireprime.com), in person at our offices or events, by telephone through our customer support channels, by electronic means including email and messaging platforms, through our mobile applications and trading platforms, during account opening procedures, or via third-party sources such as payment processors, identity verification services, or business introducers. This Policy also applies to personal information processed by third-party service providers and data processors acting on our behalf pursuant to contractual arrangements that ensure compliance with applicable data protection laws.
- 2.2 By accessing our website, creating an account with us, using any of our services, or otherwise providing personal information to us, you acknowledge that you have read, understood, and agree to be bound by the terms of this Privacy Policy. If you do not agree with any aspect of this Privacy Policy, you should discontinue use of our services immediately and refrain from providing any personal information to us. Your continued use of our services following any modifications to this Privacy Policy will constitute your acceptance of such changes.
- 2.3 The Company has implemented comprehensive technical and organizational measures to safeguard the personal information we collect and process. We have trained our staff extensively on the critical importance of protecting client confidentiality and respecting privacy rights. Furthermore, we have appointed qualified personnel responsible for overseeing data protection compliance and ensuring that all personal information is managed in accordance with applicable laws, regulations, and this Privacy Policy. We continuously review and update our privacy practices to reflect changes in technology, business operations, and legal requirements, and we conduct regular audits to ensure ongoing compliance with our privacy commitments.

## **3 INFORMATION WE COLLECT**

- 3.1 In order to provide our financial services and products, maintain compliance with legal and regulatory obligations, and deliver an optimal client experience, Solitaire Prime Ltd. collects various categories of personal information from clients and prospective clients. The scope and nature of information collected depends on the purpose for which it is being gathered and the stage of the client relationship. The Company collects personal information directly from individuals during the account opening process, through ongoing interactions and communications, and in some circumstances from third-party sources as described below.
- 3.2 For the purposes of this Policy, 'Personal Information' means any information relating to an identified or identifiable natural person. 'Confidential Information' includes Personal Information as well as any non-public, sensitive, or proprietary information obtained during the course of the client relationship, including complaint handling, surveys, internal communications, and dispute-related data.
- 3.3 **Information Collected During Account Opening:** When you apply to open a trading account with Solitaire Prime Ltd., you are required to complete a comprehensive application form that requests detailed personal and financial information. This information is essential for us to verify your identity, assess the appropriateness of our services for your circumstances, comply with Know Your Customer (KYC) and Anti-

Money Laundering regulatory requirements, and establish your account in our systems. The personal information collected during account opening includes:

- 3.3.1 Full legal name as it appears on government-issued identification documents;
- 3.3.2 Date and place of birth;
- 3.3.3 Current residential address and previous addresses if applicable;
- 3.3.4 Nationality and citizenship status;
- 3.3.5 Contact details including telephone numbers and email addresses;
- 3.3.6 Copies of identification documents such as passports, national identity cards, or driver's licenses;
- 3.3.7 Proof of address documents such as recent utility bills, bank statements, or government correspondence;
- 3.3.8 Financial information including income, employment status and occupation, net worth and liquid assets;
- 3.3.9 Source of funds for deposits and banking information for processing transactions;
- 3.3.10 Investment objectives and risk tolerance;
- 3.3.11 Trading experience and knowledge of financial markets; and
- 3.3.12 Understanding of leverage and margin trading concepts.

3.4 **Information Collected During Account Usage:** Once your account is active, we continuously collect information related to your use of our services. This operational data is essential for providing our services, ensuring account security, and complying with regulatory obligations. The information collected includes:

- 3.4.1 Account balance and equity levels;
- 3.4.2 Details of all trading transactions including instruments traded, position sizes, entry and exit prices;
- 3.4.3 Profit and loss statements and trading performance metrics;
- 3.4.4 Deposits and withdrawals processed through your account;
- 3.4.5 Margin utilization levels and margin calls issued;
- 3.4.6 Communications with our customer support team through all channels;
- 3.4.7 Login activity, device information, and access patterns; and
- 3.4.8 Any other information generated through your interaction with our platforms and services.

3.5 **Technical Information Collected Automatically:** In addition to information you provide directly, we collect certain technical information automatically when you visit our website or use our trading platforms. This technical data is collected through cookies, web beacons, pixel tags, and similar technologies and includes:

- 3.5.1 Internet Protocol (IP) address and approximate geographic location;
- 3.5.2 Device type, operating system, and browser type and version;
- 3.5.3 Pages visited on our website and navigation patterns;
- 3.5.4 Referral sources and website from which you arrived;
- 3.5.5 Time spent on pages and interaction with website features; and
- 3.5.6 Screen resolution and other device characteristics.

3.6 **Information from Third-Party Sources:** We may also obtain personal information about you from third-party sources in certain circumstances, including:

- 3.6.1 Information from payment processors to verify and process transactions;

- 3.6.2 Data from credit reference agencies and identity verification services;
- 3.6.3 Information from fraud prevention services and watchlist screening providers;
- 3.6.4 Publicly available information from company registries, sanctions lists, and politically exposed persons databases; and
- 3.6.5 Information from business introducers or affiliates who refer clients to us, provided such sharing complies with applicable laws.

#### **4 LEGAL BASES FOR PROCESSING**

- 4.1 Solitaire Prime Ltd. processes personal information only where we have a valid legal basis under applicable data protection laws. The legal basis relied upon will vary according to the purpose of the processing. In many cases, more than one lawful basis may apply to the same processing activity. The legal basis for processing affects the rights available to you and the controls you may exercise over your personal information. Processing may occur without prior notice or consent where required or permitted by law, including AML/CFT obligations, fraud prevention, sanctions screening, regulatory reporting, or court orders.
- 4.2 Performance of a contract.
- 4.3 Where necessary for the performance of a contract to which you are a party (for example, the Client Agreement or other service terms), we process your personal information to fulfil our contractual obligations and to provide the services you request. Such processing includes, but is not limited to:
  - 4.3.1 verifying identity and opening and administering client accounts;
  - 4.3.2 executing, matching and settling trades and other transactions;
  - 4.3.3 recording and applying charges, fees and other contractual entitlements;
  - 4.3.4 producing account statements, confirmations, tax and regulatory reports; and
  - 4.3.5 communicating with you in relation to your account and the services we provide.
  - 4.3.6 If you do not provide information that is necessary for the performance of the contract, we may be unable to enter into or continue the contractual relationship or to provide the requested services.
- 4.4 **Compliance with legal obligations:** We process personal information where necessary to comply with legal and regulatory obligations applicable to the Company. Examples of such obligations include:
  - 4.4.1 anti-money laundering, counter-terrorist financing and economic sanctions laws (including identity verification, transaction monitoring and suspicious activity reporting);
  - 4.4.2 financial services laws and regulations requiring suitability/appropriateness assessments, record-keeping and regulatory reporting;
  - 4.4.3 tax laws and reporting obligations (including collection and disclosure of tax identification numbers); and
  - 4.4.4 obligations under data protection and other statutory regimes.
  - 4.4.5 Where processing is required to satisfy a legal obligation, we may have limited ability to accommodate requests to restrict or delete data, and we will retain and disclose data as required by law.
- 4.5 **Legitimate interests:** In certain circumstances we rely on our legitimate interests, or the legitimate interests of third parties, as the lawful basis for processing provided that those interests are not overridden by your fundamental rights and freedoms. Legitimate interests relied upon by the Company include, without limitation:
  - 4.5.1 protecting the Company, our clients and third parties from fraud, financial crime and abuse;
  - 4.5.2 ensuring the security, resilience and integrity of our systems and networks;

- 4.5.3 managing legal claims, disputes and regulatory compliance;
- 4.5.4 conducting internal audits, risk and business continuity planning;
- 4.5.5 improving and developing products, services and client support through analytics and business intelligence; and
- 4.5.6 managing and operating our business efficiently.
- 4.5.7 Where we rely on legitimate interests we undertake and document a balancing test to assess and minimize any impact on the rights and interests of data subjects. Where appropriate, we implement safeguards (for example, data minimization and access controls).

**4.6 Consent:** Where required by law, or where we seek to rely on consent as the legal basis for processing, we will obtain your freely given, specific, informed and unambiguous consent. Typical examples include:

- 4.6.1 direct marketing communications where local law requires consent;
- 4.6.2 certain uses of cookies and similar tracking technologies where consent is required; and
- 4.6.3 processing of special category personal data where no other lawful basis applies.
- 4.6.4 You may withdraw consent at any time. Withdrawal of consent will not affect the lawfulness of processing carried out prior to withdrawal. To withdraw consent, or to change your preferences, please contact us at [info@solitaireprime.com](mailto:info@solitaireprime.com) or follow the withdrawal instructions provided at the point of collection (for example, via an unsubscribe link).

## 5 PURPOSES OF PROCESSING

- 5.1 We use personal data for the following primary purposes:
  - 5.1.1 Client onboarding, identity verification and KYC/KYB checks.
  - 5.1.2 Account administration, trade execution, settlement and reporting.
  - 5.1.3 Processing payments, withdrawals and refunds.
  - 5.1.4 Regulatory reporting and fulfilment of legal obligations (including suspicious activity reports).
  - 5.1.5 Risk management, compliance monitoring and internal audit.
  - 5.1.6 Fraud detection, prevention and investigation.
  - 5.1.7 Security, system integrity, intrusion detection and incident response.
  - 5.1.8 Customer service, dispute resolution and communications.
  - 5.1.9 Marketing, where you have consented or where permitted by law.
  - 5.1.10 Aggregated, anonymized analytics and business improvement.
- 5.2 We will not process personal data for purposes incompatible with the purposes for which it was collected without notifying you and, where required, obtaining your consent.

## 6 DATA PROTECTION PRINCIPLES

- 6.1 In accordance with privacy law principles, we process personal data fairly, transparently, and lawfully; for specified purposes only; minimizing data collection to what is necessary; ensuring accuracy and updates; securely protecting it; limiting storage duration; and maintaining accountability.
- 6.2 We implement these principles through data minimization practices, regular accuracy checks, and compliance audits.

## 7 DATA MINIMIZATION AND ACCURACY

- 7.1 Data Minimization: We collect and process only the personal data that is necessary for the specified purposes. We regularly review our data collection practices to ensure we do not collect excessive information and implement data minimization techniques where appropriate.
- 7.2 Accuracy: We take reasonable steps to ensure that personal data is accurate, complete, and up-to-date. If you believe your information is inaccurate or incomplete, please contact us to request corrections.

## **8 DISCLOSURE AND SHARING OF PERSONAL INFORMATION**

- 8.1 Solitaire Prime Ltd. will not disclose personal information to third parties except where necessary for the purposes set out in this Privacy Policy, where required or permitted by law, or with your consent. When we share personal information, we take appropriate measures to ensure that recipients are bound by duties of confidentiality and process the data only for authorized purposes.
- 8.2 **Intra-Group Sharing:** We may disclose personal information to other entities within our corporate group, including parent companies, subsidiaries and affiliated companies under common control. Such sharing facilitates efficient business operations, enables provision of consistent services across jurisdictions, and supports consolidated risk management, compliance and administrative functions. All entities within our group are required to handle personal information in accordance with this Privacy Policy and applicable data protection laws.
- 8.3 **Third-Party Service Providers and Processors:** We engage third-party service providers to perform various functions on our behalf, and these providers may require access to personal information to deliver their services. Categories of service providers include:
  - 8.3.1 Technology providers (hosting, software, platform and infrastructure services);
  - 8.3.2 Payment processors, banks and financial institutions;
  - 8.3.3 Identity verification, KYC and AML screening services;
  - 8.3.4 Communications and email delivery services;
  - 8.3.5 Cloud storage and data backup providers;
  - 8.3.6 Customer support and call center services;
  - 8.3.7 Professional advisors (legal counsel, accountants, auditors, consultants);
  - 8.3.8 Marketing and analytics service providers; and
  - 8.3.9 Security, fraud prevention and risk management services.
- 8.4 We enter into contractual arrangements with service providers requiring them to process personal information only in accordance with our instructions, to implement appropriate security measures, and to comply with applicable data protection laws. We conduct due diligence on service providers and monitor their compliance with contractual obligations.
- 8.5 **Regulatory, Legal and Law Enforcement Disclosures:** We disclose personal information to regulatory authorities, law enforcement agencies, courts, tribunals and other governmental bodies where required or permitted by law:
  - 8.5.1 In response to court orders, subpoenas, warrants, regulatory requests or other legal process;
  - 8.5.2 To comply with Anti-Money Laundering and counter-terrorist financing reporting obligations;
  - 8.5.3 To cooperate with regulatory investigations, examinations and enforcement actions;
  - 8.5.4 To respond to lawful requests from law enforcement regarding suspected criminal activity;
  - 8.5.5 To comply with tax reporting obligations and disclosures to tax authorities; and
  - 8.5.6 To disclose information to credit reference agencies, fraud prevention databases and sanctions screening services.

- 8.6 In some cases we may be prohibited by law from informing you that personal information has been disclosed to authorities.
- 8.7 **Business Transactions:** In the event of a merger, acquisition, reorganization, asset sale, financing, bankruptcy or similar corporate transaction, personal information may be transferred or disclosed to prospective purchasers, investors, successors or assignees. We will endeavor to notify you of any such transaction that results in a change of control or material change in how your personal information is handled, subject to legal and confidentiality restrictions.
- 8.8 **Other Disclosures:** We may disclose personal information:
  - 8.8.1 With your explicit consent or at your direction;
  - 8.8.2 To protect the vital interests of any person;
  - 8.8.3 To establish, exercise or defend legal claims;
  - 8.8.4 To authorized representatives acting on your behalf (with appropriate authorization); and
  - 8.8.5 Where disclosure is necessary for the performance of a task carried out in the public interest.

- 8.9 We do not sell, rent or lease personal information to third parties for their own commercial or marketing purposes. Any disclosure is made on a need-to-know basis and only to the extent necessary for the specified purpose. We are not data brokers and do not participate in the sale of personal data as defined under applicable laws (e.g., CCPA or GDPR).

## 9 INTERNATIONAL TRANSFERS

- 9.1 Solitaire Prime Ltd. operates globally and may transfer personal information to countries outside your country of residence, including countries that may not provide the same level of data protection as the laws of your country or the European Economic Area. Such transfers are necessary to provide our services, comply with legal obligations, and operate our business efficiently.
- 9.2 When we transfer personal information from the European Economic Area to third countries that have not been recognized by the European Commission as providing an adequate level of protection, we implement appropriate safeguards including:
  - 9.2.1 Standard Contractual Clauses adopted by the European Commission;
  - 9.2.2 Binding Corporate Rules for intra-group transfers;
  - 9.2.3 Approved certification mechanisms and codes of conduct; and
  - 9.2.4 Other transfer mechanisms recognized under applicable data protection laws.
- 9.3 These safeguards ensure that personal information receives an equivalent level of protection regardless of where it is processed and provide enforceable rights for data subjects.
- 9.4 Personal information transferred to third countries may be subject to the laws of those jurisdictions, including laws that permit or require disclosure to governmental authorities, law enforcement or national security agencies. We select recipients and destination countries carefully, taking into account the legal framework and practical protections available, and we implement technical and organizational measures to protect information even where local legal protections may be less robust.
- 9.5 By using our services and providing personal information, you acknowledge and consent to the international transfer and processing of your personal information as described in this Privacy Policy. If you wish to obtain more information about the specific safeguards implemented for transfers to particular countries, please contact us at [info@solitaireprime.com](mailto:info@solitaireprime.com).

## 10 DATA SECURITY

- 10.1 Solitaire Prime Ltd. has implemented comprehensive technical and organizational security measures designed to protect personal information against unauthorized access, unlawful processing, accidental loss, destruction, damage or disclosure. We recognize that the security of client data is fundamental to maintaining

trust and meeting our legal obligations.

10.2 **Technical Security Measures:** Our technical security infrastructure includes:

- 10.2.1 Industry-standard encryption protocols (including Secure Socket Layer / Transport Layer Security) protecting data in transit and at rest;
- 10.2.2 Firewalls, intrusion detection and prevention systems protecting network perimeter and internal segments;
- 10.2.3 Network segmentation and access controls limiting exposure of sensitive data;
- 10.2.4 Multi-factor authentication for administrative access and high-risk operations;
- 10.2.5 Secure data storage with encryption and restricted physical and logical access;
- 10.2.6 Regular security patches, updates and vulnerability management;
- 10.2.7 Comprehensive logging, monitoring and alerting systems; and
- 10.2.8 Anti-malware, anti-virus and endpoint protection tools.

10.3 **Organizational Security Measures:** We implement organizational controls including:

- 10.3.1 Strict access controls on a need-to-know basis with regular review of access rights;
- 10.3.2 Background checks and vetting for employees with access to sensitive information;
- 10.3.3 Confidentiality and non-disclosure agreements binding all staff and contractors;
- 10.3.4 Comprehensive training on data protection, privacy and security best practices;
- 10.3.5 Security awareness programs addressing phishing, social engineering and emerging threats;
- 10.3.6 Documented incident response, breach notification and business continuity procedures;
- 10.3.7 Regular security audits, assessments and penetration testing; and
- 10.3.8 Clear accountability and governance structures for data protection.

10.4 **Client Security Responsibilities:** While we implement robust security measures, clients share responsibility for protecting their accounts:

- 10.4.1 Maintain strict confidentiality of usernames, passwords and authentication credentials;
- 10.4.2 Choose strong, unique passwords and change them periodically;
- 10.4.3 Do not share account credentials with any third party;
- 10.4.4 Avoid accessing accounts from public, shared or unsecured devices;
- 10.4.5 Do not use public Wi-Fi networks for accessing trading accounts;
- 10.4.6 Ensure devices used for trading are protected with current anti-virus software and security patches;
- 10.4.7 Log out of accounts properly after each session;
- 10.4.8 Report any suspected unauthorized access, security incident or data breach immediately; and
- 10.4.9 Be vigilant against phishing, social engineering and fraudulent communications.

10.5 Internal Privacy Controls

“Employees, contractors and authorized personnel with access to personal or confidential information are required to:

- 10.5.1 access data strictly on a ‘need-to-know’ basis;
  - 10.5.2 refrain from discussing confidential information in public or unsecured environments;
  - 10.5.3 comply with clean desk and secure storage requirements;
  - 10.5.4 ensure encrypted and protected transmission of data; and
  - 10.5.5 adhere to disciplinary sanctions, including termination, for violations of this Policy.”
- 10.6 **Security Limitations:** Despite implementation of comprehensive security measures, no system can be entirely secure, and we cannot guarantee absolute security of personal information. Internet-based communication and data storage carry inherent risks, and unauthorized access, cyber-attacks, system failures or other security incidents may occur despite our best efforts.
- 10.7 In the event of a personal data breach that poses a risk to the rights and freedoms of data subjects, we will notify affected individuals and relevant supervisory authorities in accordance with applicable data protection laws. We will take all appropriate measures to investigate the breach, mitigate harm, prevent recurrence and cooperate with authorities.
- 10.8 The Company will not be held liable for unauthorized access, loss or disclosure of personal information that occurs despite implementation of reasonable security measures, particularly when such incidents result from circumstances beyond our control, client failure to follow security recommendations, sophisticated cyber-attacks, or actions of third parties.

## **11 COOKIES AND TRACKING TECHNOLOGIES**

- 11.1 Solitaire Prime Ltd. uses cookies and similar tracking technologies on our website and trading platforms to enhance functionality, improve user experience, analyze usage patterns and for marketing purposes. This section provides an overview of our use of cookies; for more detailed information, please refer to our separate Cookie Policy available on our website.
- 11.2 **What Are Cookies:** Cookies are small text files placed on your device when you visit our website or use our platforms. They contain information that is stored on your device's hard drive, and that allows us to recognize your browser, remember your preferences, and capture certain information about your activities and behavior.
- 11.3 **Types of Cookies We Use:**
- 11.3.1 **Strictly Necessary Cookies:** These cookies are essential for the operation of our website and trading platforms and enable core functionality such as security, authentication, session management and network routing. These cookies are required for the services to function properly and cannot be disabled without severely impacting your ability to use our platforms, including preventing access to your trading account. We do not require your consent for strictly necessary cookies.
  - 11.3.2 **Performance and Analytics Cookies:** These cookies collect information about how visitors use our website, such as which pages are visited most frequently, how users navigate through the site, average session duration, and whether users encounter error messages. This information is aggregated and typically anonymized and is used to improve website functioning, design and content. Examples include Google Analytics cookies.
  - 11.3.3 **Functionality Cookies:** These cookies remember choices you make (such as language preferences, currency settings, login credentials and customization options) to provide enhanced, personalized features. They enable the website to remember your preferences across sessions and to provide features tailored to your profile.
  - 11.3.4 **Targeting and Advertising Cookies:** These cookies are used to deliver content and advertisements more relevant to you and your interests. They may be set by us or by third-party advertising partners and may be used to build a profile of your interests based on browsing activity across multiple

websites. These cookies track your browsing behavior and compile information about your interests to enable targeted advertising.

11.3.5 **Managing Cookies:** Most web browsers are set to accept cookies automatically, but you can modify your browser settings to decline cookies or to alert you when cookies are being sent. However, if you choose to disable cookies, some features of our website and trading platforms may not function properly, and you may not be able to access certain services or features. In particular:

- (a) Disabling strictly necessary cookies will prevent you from logging in to your trading account and using core platform functionality.
- (b) Disabling performance cookies may result in degraded user experience and slower resolution of technical issues.
- (c) Disabling functionality cookies will require you to re-enter preferences each time you visit the website.
- (d) Disabling advertising cookies may result in less relevant advertisements but will not reduce the total number of advertisements you see.

11.4 You can control and delete cookies through your web browser settings. You can also opt out of certain types of tracking and targeted advertising through industry opt-out mechanisms such as:

- 11.4.1 Your Online Choices (EU): [www.youronlinechoices.eu](http://www.youronlinechoices.eu)
- 11.4.2 Digital Advertising Alliance (US): [www.aboutads.info/choices](http://www.aboutads.info/choices)
- 11.4.3 Network Advertising Initiative (US): [www.networkadvertising.org/choices](http://www.networkadvertising.org/choices)
- 11.4.4 Google Ads Settings: [adssettings.google.com](https://adssettings.google.com)
- 11.4.5 DoubleClick opt-out: [adssettings.google.com/authenticated](https://adssettings.google.com/authenticated)

11.5 **Other Tracking Technologies:** In addition to cookies, we may use other tracking technologies including:

- 11.5.1 Web beacons (small graphic images embedded in emails or web pages that track whether you have opened an email or visited a page)
- 11.5.2 Pixel tags (code embedded in web pages that collects information about device and browsing behavior)
- 11.5.3 Local storage objects (such as HTML5 local storage) that store data locally on your device
- 11.5.4 Device fingerprinting techniques that collect configuration information about your device

11.6 These technologies work in conjunction with cookies to provide information about user behavior, and controlling cookies generally limits the functionality of these technologies as well.

11.7 For more detailed information about the specific cookies and tracking technologies we use, their purposes, retention periods, and third-party providers, please refer to our Cookie Policy available at [www.solitaireprime.com/cookie-policy](http://www.solitaireprime.com/cookie-policy).

## 12 YOUR RIGHTS

12.1 Under applicable data protection laws, you have various rights regarding your personal information. Solitaire Prime Ltd. is committed to facilitating the exercise of these rights in accordance with legal requirements. The specific rights available to you may vary depending on your jurisdiction and the legal basis on which we are processing your information.

12.2 **Right of Access:** You have the right to obtain confirmation of whether we are processing your personal information and, if so, to access that information and receive details about the processing. Subject to applicable law, you may request:

- 12.2.1 A copy of the personal information we hold about you;

- 12.2.2 Information about the purposes of processing;
  - 12.2.3 The categories of personal information concerned;
  - 12.2.4 The recipients or categories of recipients to whom the information has been or will be disclosed;
  - 12.2.5 The envisaged retention period or the criteria for determining the retention period;
  - 12.2.6 Information about your rights (rectification, erasure, restriction, objection, portability, complaint);
  - 12.2.7 The source of the information if not collected directly from you; and
  - 12.2.8 The existence of automated decision-making, including profiling, and meaningful information about the logic involved.
- 12.3 We will provide the requested information within thirty (30) days of receiving your request, though we may extend this period by an additional sixty (60) days where requests are complex or numerous. The first copy of your information is provided free of charge, but we may charge a reasonable administrative fee for additional copies or for manifestly unfounded, excessive or repetitive requests.
- 12.4 **Right to Rectification:** You have the right to request rectification of personal information that is inaccurate or incomplete. If you identify errors or if your circumstances change (for example, change of address, employment or financial situation), you must notify us promptly so that we can update our records. You may be able to update certain information yourself through your account settings; for other information, contact us at [info@solitaireprime.com](mailto:info@solitaireprime.com).
- 12.5 We may request supporting documentation to verify the accuracy of updated information, particularly for identity information, financial details or other information subject to regulatory requirements. It is your responsibility to keep your personal information current and accurate. The Company will not be held responsible for consequences arising from incorrect, incomplete or outdated information that you have provided or failed to update.
- 12.6 **Right to Erasure ("Right to be Forgotten"):** You have the right to request deletion of your personal information in certain limited circumstances:
- 12.6.1 The information is no longer necessary for the purposes for which it was collected;
  - 12.6.2 You withdraw consent (where processing was based solely on consent) and there is no other legal ground for processing;
  - 12.6.3 You object to processing based on legitimate interests and there are no overriding legitimate grounds for continuing to process;
  - 12.6.4 The information has been processed unlawfully; and
  - 12.6.5 Erasure is required to comply with a legal obligation.
- 12.7 However, the right to erasure is not absolute. We may refuse erasure requests where retention is necessary:
- 12.7.1 To comply with legal obligations (including Anti-Money Laundering record-keeping requirements of five years after account closure and financial services record-keeping requirements of seven years);
  - 12.7.2 To establish, exercise or defend legal claims;
  - 12.7.3 For archiving purposes in the public interest, scientific or historical research, or statistical purposes; and
  - 12.7.4 For the performance of a task carried out in the public interest.
- 12.8 When you request erasure, we will carefully assess your request against our legal obligations and legitimate interests and will inform you of the outcome and the reasons for any refusal.
- 12.9 **Right to Restriction of Processing:** You have the right to request that we restrict processing of your personal information (that is, that we retain but not further process the information) in the following circumstances:

- 12.9.1 You contest the accuracy of the information and we need time to verify its accuracy;
  - 12.9.2 Processing is unlawful but you do not want the information deleted;
  - 12.9.3 We no longer need the information for our purposes but you require it to establish, exercise or defend legal claims; and
  - 12.9.4 You have objected to processing based on legitimate interests and we are considering whether our interests override yours.
- 12.10 When processing is restricted, we may store the information but will not otherwise process it except with your consent, for the establishment, exercise or defense of legal claims, for the protection of the rights of another person, or for important public interest reasons.
- 12.11 **Right to Data Portability:** You have the right, in certain circumstances, to receive personal information you have provided to us in a structured, commonly used and machine-readable format, and to transmit that information to another controller. This right applies where:
- 12.11.1 Processing is based on your consent or on performance of a contract; and
  - 12.11.2 Processing is carried out by automated means.
- 12.12 Data portability does not apply to all personal information we hold (for example, it does not apply to information derived from your data or to information obtained from third parties), and there may be practical or technical limitations on what information can be provided and in what format. If you wish to exercise this right, please contact us with details of your request.
- 12.13 **Right to Object:** You have the right to object to processing of your personal information in certain circumstances:
- 12.13.1 **Objection to processing based on legitimate interests:** You can object to processing based on our legitimate interests (including profiling) unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms, or the processing is for the establishment, exercise or defense of legal claims
  - 12.13.2 **Objection to direct marketing:** You can object at any time to the use of your personal information for direct marketing purposes (including profiling for marketing purposes), and if you do so, we will cease processing your information for those purposes without further justification
  - 12.13.3 **Objection to processing for research/statistics:** You can object to processing for scientific or historical research or statistical purposes unless the processing is necessary for the performance of a task carried out for reasons of public interest
- 12.14 To object to processing, contact us at [info@solitaireprime.com](mailto:info@solitaireprime.com) with details of your objection and, where relevant, your reasons. We will consider your request in accordance with applicable law and will cease processing if required to do so.
- 12.15 **Right to Withdraw Consent:** Where we rely on your consent as the legal basis for processing, you have the right to withdraw consent at any time. Withdrawal of consent will not affect the lawfulness of processing based on consent before withdrawal, and we may continue to process your information on other legal bases (such as contractual necessity or legal obligation) even after you withdraw consent.
- 12.16 To withdraw consent, contact us at [info@solitaireprime.com](mailto:info@solitaireprime.com) or follow the specific withdrawal mechanisms provided when consent was obtained (for example, unsubscribe links in marketing emails or cookie consent management tools).
- 12.17 **Exercising Your Rights:** To exercise any of these rights, please contact us at [info@solitaireprime.com](mailto:info@solitaireprime.com) with the following information:
- 12.17.1 Clear identification of which right(s) you wish to exercise;
  - 12.17.2 Sufficient information to verify your identity (to protect against unauthorized disclosure);

12.17.3 Specific details about your request; and

12.17.4 Any supporting documentation relevant to your request.

- 12.18 We may need to verify your identity before processing your request to ensure that personal information is disclosed only to the individual to whom it pertains. We will respond to your request within the timeframe required by applicable law (typically 30 days, extendable to 90 days for complex or numerous requests) and will inform you if we are unable to fulfill your request, providing reasons for our decision.

## **13 DATA RETENTION**

13.1 We maintain a documented data retention schedule that sets retention periods for different categories of personal information in line with legal, regulatory investigations, fraud prevention, enforcement of contractual rights and business requirements. The schedule is reviewed periodically and updated where necessary.

13.2 Typical retention periods include (without prejudice to longer statutory requirements):

13.2.1 **KYC / identity & verification documents:** minimum five years after the end of the business relationship (or longer where required by applicable law).

13.2.2 **Transaction, trading & settlement records:** minimum seven years after the transaction or after the business relationship has ended.

13.2.3 **Communications (including recorded calls and chat transcripts):** retained for periods required by applicable financial services or regulatory rules (commonly 5-7 years), or longer where relevant to disputes or investigations.

13.2.4 **Account closure records, sanctions / watchlist screening results, and fraud investigations:** retained for periods necessary to fulfil legal or investigative requirements.

13.2.5 **Marketing consents and suppression lists:** retained indefinitely while you remain opted-out, to ensure your preferences are respected.

13.2.6 **System logs, security and audit records:** retained for operational, security, and forensic purposes in accordance with internal security policy and applicable law.

13.3 Where retention periods expire, we will securely delete, destroy or irreversibly anonymize personal information, subject to any legal holds for ongoing litigation, regulatory investigations or other lawful reasons to retain data.

13.4 If you have specific retention-related queries (for example, to request earlier deletion subject to legal limits), contact us at [info@solitaireprime.com](mailto:info@solitaireprime.com) and we will assess your request in line with this Policy and applicable law.

## **14 CHILDREN'S PRIVACY**

Our services are not directed at, nor intended for, persons under the age of eighteen (18). We do not knowingly collect personal information from children. If we become aware that we have collected personal data of a child, we will take steps to delete such data as soon as practicable unless retention is required by law.

## **15 CUSTOMER COMMUNICATION AND TERMS**

15.1 Company's Terms and Conditions and Privacy Policy will describe AML/CFT obligations, potential requests for information, transaction limits, account restrictions, and the Company's right to refuse or terminate services where AML/CFT risk is unacceptable.

15.2 Customers must provide information and documents requested for CDD/EDD, ongoing monitoring, or investigations. Failure to cooperate may result in delayed transactions, restrictions, or termination.

## **16 DATA BREACH NOTIFICATION**

- 16.1 We maintain an incident response plan and will investigate any suspected personal data breach promptly. Where a breach is likely to result in a risk to the rights and freedoms of individuals, we will notify the relevant supervisory authority and affected data subjects without undue delay and in accordance with applicable law.
- 16.2 Breach notifications will include, where required, a description of the nature of the breach, the categories of data affected, likely consequences, measures taken or proposed to mitigate the risk, and contact details for further information.
- 16.3 You should report suspected incidents or suspected unauthorized disclosures to [security@solitaireprime.com](mailto:security@solitaireprime.com) or [info@solitaireprime.com](mailto:info@solitaireprime.com) immediately.

## **17 THIRD-PARTY SITES & LINKED SERVICES**

- 17.1 Our website and communications may contain links to third-party websites and services (including payment gateways, analytics and social media). We are not responsible for the privacy practices or content of third-party sites. Before providing personal information to any third party, please review their privacy policy and terms of use.

## **18 MARKETING, PROMOTIONS & ELECTRONIC COMMUNICATIONS**

- 18.1 We may contact you with promotional information about our products and services where you have consented or where permitted by law (for example, for related services to those you already receive). You may opt out of marketing communications at any time by using the unsubscribed links in our emails or by contacting [info@solitaireprime.com](mailto:info@solitaireprime.com). Where you opt out of certain processing activities, we may be unable to continue providing some services or information, and the Company shall not be liable for consequences arising from such limitations, to the extent permitted by law.
- 18.2 Where you opt out, we will place your details on a suppression list to ensure you are not contacted again for marketing, consistent with applicable law.

## **19 AUTOMATED DECISION-MAKING & PROFILING**

- 19.1 We may carry out limited automated processing and profiling for purposes such as risk assessment, fraud detection, suitability/appropriateness assessment and systems security. Decisions based solely on automated processing that produce legal or similarly significant effects will only be taken where permitted by law and with appropriate safeguards.
- 19.2 Where applicable, you have the right to obtain meaningful information about the logic involved and to request human review and challenge of automated decisions. To exercise these rights, contact [info@solitaireprime.com](mailto:info@solitaireprime.com).

## **20 DATA PROTECTION OFFICER / PRIVACY CONTACT**

- 20.1 We have appointed a Data Protection Officer (DPO) or privacy lead to oversee compliance with this Policy, handling data security incidents and breaches, monitoring implementation of this Policy, and acting as the primary contact point with supervisory authorities. For privacy enquiries, data subject requests or complaints, please contact:

20.1.1 **Email:** [info@solitaireprime.com](mailto:info@solitaireprime.com)

20.1.2 **Postal:** Solitaire Prime Ltd., Ground floor, The Sotheby Building, Rodney Village, Rodney Bay, Gros-Islet, Saint Lucia.

## **21 INTERNATIONAL CUSTOMERS & LOCAL LAWS**

- 21.1 If you are located in a jurisdiction with specific privacy laws, those laws may provide additional rights or override aspects of this Policy. This Policy supplements but does not replace any jurisdiction-specific privacy notices provided at the point of service. If local law affords you additional rights, we will comply with those

rights to the extent applicable.

## **22 CHANGES TO THIS POLICY**

- 22.1 We regularly review this Policy and may amend it to reflect changes in legal or regulatory requirements, business practices, or technology. Where changes are material, we will provide prominent notice on our website and, where appropriate, notify affected clients directly. The “Last Updated” date at the top of this document indicates the most recent revision. In the event of any inconsistency between translated versions of this Policy, the English version shall prevail.

## **23 COMPLAINTS & SUPERVISORY AUTHORITY**

- 23.1 If you are dissatisfied with our handling of your personal data, please contact us first so we can try to resolve your concerns: [info@solitaireprime.com](mailto:info@solitaireprime.com)
- 23.2 You also have the right to lodge a complaint with the competent data protection supervisory authority in your jurisdiction. Complaints will be handled in accordance with the Company’s Complaint Handling and Processing Policy, available upon request. If you are unsure which authority to contact, we will advise you upon request.