

Privacy Policy

We highly recommend that you carefully review our Privacy Policy as it is an essential component of the agreement between you, also known as the "User," and Primary Capital.

The Privacy Policy outlines the procedures that Primary Capital (referred to as "the Company") follows regarding your personal information. Our company takes the security of our customers' personal data very seriously and is committed to maintaining the confidentiality of this information. To prevent the loss, abuse, alteration, or unauthorized access of your information by third parties, we adhere to all necessary organizational and technical requirements.

This policy outlines how we handle and use personal data of our customers, which includes any information that identifies them as an individual. We collect personal data when customers use our services and communicate with us through various channels. This policy details what information we collect, how we use it, who we share it with, and how we protect it. By agreeing to the Privacy Policy, customers consent to the collection, storage, and use of their personal data in accordance with this policy and relevant laws. Customers can withdraw their consent and request the removal of their data by contacting us.

What personal data does the Company collect?

Users have the option to submit their identification, contact, financial, and other relevant information through various means such as online forms, phone applications, or email correspondence during the process of logging in to their Personal Account or otherwise.

Furthermore, your personal information will be collected when you engage in any of the following activities:

- Utilize our services or purchase our products;
- Create an account on our website;
- Subscribe to our or third-party publications affiliated with us;
- Consent to receive our promotional materials and newsletters;
- Participate in contests, loyalty programs, special promotions, or surveys;
- Provide feedback or reviews.

Personal data may be requested on specific pages of the website, which you can provide voluntarily (for instance, we may ask for contact information when you

register for a Personal Account, subscribe to our advertising newsletters, and notifications or submit applications to us). When you access our website, certain information is automatically transmitted from your device to us. In some jurisdictions, this information may be considered personal data under certain data protection laws, such as those in the European Union. Cookies are used to collect some of this information. The Cookies Policy provides more information about the types of cookies we use and their purposes.

The personal information that may be collected by the Company falls into the following categories:

- ✓ Information that you willingly disclose. You have the option to share your personal details, contact information, financial data, and other information by completing online forms, phone calls, emails, or any other available means with the Company. Furthermore, specific pages of the Company's website may request that you voluntarily provide personal information. The personal information you are asked to provide, as well as the reasons for the request, will be explained when you are prompted to provide it.
- ✓ The Company website automatically collects certain data from your device, such as your IP address, browser type, and device type, when you visit. The website also records how your device interacts with it, including the links you click. This information is collected to analyze user behavior and requests, and to enhance the quality of products and services provided by the Company.

In what ways can the Company utilize your information?

- Delivering newsletters to you;
- Providing our services to you appropriately;
- Analyzing and comprehending our user base for enhancing the Service;
- Examining breaches of this Privacy Policy to guarantee conformity, as well as safeguard our interests and rights.
- We might send you marketing communications containing details about our Services that we believe would be of interest to you.

Here are the intentions for which we will utilize your information:

1. To offer customer support, we may require various types of personal data such as identification details (name, surname, address, country of residence, etc.), contact information (phone number, email address, messenger details, etc.), financial data (bank account details, bank card numbers, proof of funds, etc.), and documents related to politics (waivers, official documents) and other similar information. We may also need copies of documents that verify the information provided by the user.

2. The Company also utilizes your data for risk management, prevention of money laundering, and to comply with regulatory and legal requirements. The data types utilized for this purpose include transactional data, financial data, and identity data.

3. Marketing purposes involve using your contacts, consent, and correspondence to provide information and updates regarding products and services, as well as engage in marketing activities. The legal basis for this is the fulfillment of the contract between you and the company.

What information can the company disclose to certain third parties?

Personal data will not be disclosed to any third party unless one of the following conditions applies. We may share your information with outside companies, organizations, or individuals if we have a reasonable belief that it is necessary for one of the following reasons: to comply with applicable laws, regulations, legal proceedings, or government requests; to enforce current laws, including investigating potential violations; to detect and prevent fraud, support security, or address technical issues; to protect the rights, property, or safety of the Company, our users, or the public as permitted or required by law; with our group companies, third-party service providers, and partners who process your information to provide services to the Company or for other purposes described in this Policy; or with any law enforcement, regulatory, government agency, court, or other third party as required by law.

We may share identifiable information with our partners and the public for various purposes, such as demonstrating trends in the use of our website. If we participate in a merger, acquisition, or asset sale, we will maintain the confidentiality of personal data and notify users before any transfer of data or change in privacy policy. We do not disclose users' personal information, such as their name or email address, to other users. Your data may be transferred to a third party in another country for further processing in compliance with this Policy. This could involve the transfer of data to countries with different levels of protection than your country of residence, but we will take adequate measures, such as technical, contractual, or legal safeguards, to ensure your privacy rights are protected.

What rights does the user have?

- Submit a request for correction of any inaccurate or incomplete personal information. The Company will process the request and inform any third parties to whom the personal information has been disclosed, in accordance with the terms outlined in this Policy.
- Request assistance with the processing of your personal information. Refusal to

allow the processing of personal data may result in your inability to access certain products and services for which the processing of personal information is required.

- You can ask us to delete all of your personal information, and we will comply unless there is a legal reason not to do so.
- You have the right to receive a copy of your personal data that we have on file.
- If your personal information is inaccurate or incomplete, you can request that we correct it. We will update our records and notify any third parties who received your personal information, as described above.
- You have the right to request a copy of your personal data, which we will transfer to another data controller of your choice.
- To stop receiving marketing materials from us, click on the “unsubscribe” or “opt-out” link provided in those messages.
- You can ask us to stop processing your data, but this may prevent you from using certain services that require it.
- You can withdraw your consent for us to process your data at any time, but this may limit your ability to use certain features of our service that require data processing.
- If you have concerns about how we handle your data, you can file a complaint with a supervisory authority.

Company security measures

The Company implements suitable administrative and technical measures to safeguard the personal data it gathers and handles.

The Company takes various measures to ensure the security of the personal data it collects and processes, including but not limited to:

- Storing personal data on secure servers.
- Utilizing encrypted transmission links.
- Implementing additional security measures such as firewalls, authentication systems, access controls to prevent unauthorized access to systems and data.
- Conducting regular reviews of its information collection, storage, and processing practices, including physical security measures, to prevent unauthorized access to its systems.
- Limiting access to personal information to employees, contractors, and agents who require access for processing purposes.

Data retention

The personal information that we collect from you will only be kept for as long as it is necessary to achieve the purposes stated in this Policy, unless we are required by law to retain it for a longer period of time.

Automatic decision-making

At times, we may use your data to make automatic decisions (such as profiling) that have a legal impact on you or significantly affect you in another way. An automatic decision refers to a decision made about you using software algorithms without human intervention. If we make an automatic decision that concerns you, you have the right to contest the decision, express your opinion, and ask for the decision to be reconsidered.

If you have any inquiries, remarks, or require further clarification, please get in touch with us.