PRIME DESK

MULTI-ASSET INSTITUTIONAL-GRADE BROKERAGE

Privacy Policy

How Prime Desk Ltd. Collects, Uses,
Shares and Protects Personal Data

Company Registration Number 2026-00429
Saint Lucia International Business Company
Version 1.0 · Reference PD·LEG·03

APPLIES TO CLIENTS, APPLICANTS, PARTNERS AND WEBSITE VISITORS

WWW.PRIME-DESK.COM

1 — Who We Are & What This Covers

1.1 The Controller

Prime Desk Ltd., an International Business Company incorporated in Saint Lucia under company number 2026-00429, with its registered office at Top Floor, Rodney Court Building, Rodney Bay, Gros Islet, Saint Lucia LC01 401, is the controller of the personal data described in this Policy.

1.2 Who This Applies To

This Policy applies to clients and applicants, introducing brokers and partners and their authorised representatives, visitors to our website and platforms, and anyone who contacts us. It forms part of the Client Agreement and should be read with the Cookie Policy.

1.3 Our Standard

Prime Desk is not established in a jurisdiction that imposes a comprehensive data protection statute of the kind found in the European Union or the United Kingdom. We have chosen to apply the substance of those standards voluntarily — purpose limitation, data minimisation, security, retention limits, and the individual rights set out at Section 9 — because we consider them the correct standard for a financial firm, not because we are compelled to.

2 — The Data We Hold

CATEGORY	EXAMPLES
Identity	Full name, date and place of birth, nationality, gender, photograph from an identity document, signature.
Identification numbers	Passport or national identity card number, and the document's issuing authority and expiry.
Contact	Residential address, email address, telephone numbers, country of residence.
Financial and economic	Bank and payment account details, source of funds and source of wealth evidence, employment and income information, trading experience and knowledge.
Account and trading	Account numbers and types, balances, deposits and withdrawals, positions, orders, execution records, margin history, profit and loss.
Screening	Results of sanctions, politically exposed person, and adverse media checks.
Communications	Emails, chat and messaging transcripts, support tickets, and recordings of telephone calls.
Technical	IP address, device and browser information, operating system, login records, platform activity logs, and cookie identifiers.
Marketing	Your preferences, consents and withdrawals of consent, and your responses to our communications.

We do not seek special category data such as health, religious belief, or political opinion. Where such information appears incidentally in a document you provide, we do not use it and remove or disregard it.

3 — Where the Data Comes From

a) **From you** — when you register, complete verification, fund your account, trade, or contact us.

b) **From your use of our services** — automatically, through the platform, the client portal, and our website.

c) **From introducing brokers and partners** — where they introduce you to us, limited to the information necessary to open and administer your account.

d) **From verification and screening providers** — identity verification, document authentication, sanctions and PEP screening, and adverse media checks.

e) **From payment providers and banks** — confirmation of payment details, transaction status, and chargeback information.

f) **From public sources** — company registries, sanctions lists, and publicly available media, where we are required to screen.

4 — Why We Use It

PURPOSE	OUR BASIS
Opening and administering your account	Performance of the Client Agreement with you.
Executing and recording your trades	Performance of the Client Agreement, and our legitimate interest in maintaining an accurate record.
Processing deposits and withdrawals	Performance of the Client Agreement, and compliance with financial crime obligations.
Verification, AML, CFT and sanctions screening	Compliance with legal and regulatory obligations and our internal AML and KYC Policy.
Client categorisation and appropriateness	Performance of the Client Agreement and our legitimate interest in offering suitable account types.
Risk management, fraud prevention and detection of abusive trading	Our legitimate interest in protecting the Company, its clients, and the integrity of the platform.
Support, complaints and dispute resolution	Performance of the Client Agreement and our legitimate interest in resolving disputes fairly.
Improving our services and platform security	Our legitimate interest in operating a secure and reliable service.
Marketing our services to you	Your consent, which you may withdraw at any time, or our legitimate interest in communicating with existing clients about similar services.
Responding to lawful requests from authorities	Compliance with legal obligations.

Where we rely on legitimate interest, we have considered whether that interest is overridden by your rights and have concluded it is not. You may object, as described at Section 9.

5 — Who We Share It With

We do not sell personal data. We share it only where necessary for the purposes at Section 4, and only to the extent required.

RECIPIENT	WHAT THEY RECEIVE AND WHY
Technology providers	Trading platform, bridge, CRM, hosting, communications and analytics providers, who process data on our instructions under written agreements.
Liquidity providers	Order and execution data necessary to route and settle your trades. They do not receive your identity documents.
Payment providers and banks	The information necessary to process a deposit or withdrawal and to investigate a payment dispute.
Verification and screening providers	Identity and document data necessary to complete verification and sanctions screening.
Introducing brokers and partners	Limited information about the accounts they have introduced — typically status, trading volume, and the commission payable. **They do not receive your identity documents, contact details beyond what you provided to them, or your balance.**
Professional advisers	Auditors, lawyers, and accountants, bound by professional confidentiality.
Authorities	Regulators, law enforcement, tax and other authorities where we are lawfully required to disclose, including in response to a valid order or a suspicious activity report.
Corporate transactions	A prospective purchaser or successor, subject to confidentiality, in the event of a sale, merger, or reorganisation of the Company.

Where a recipient processes data on our behalf, it acts on our documented instructions, is bound to confidentiality, and is required to apply appropriate security measures.

6 — International Transfers

Prime Desk operates internationally. Your data may be transferred to, stored in, and processed in countries other than your own, including jurisdictions whose data protection laws differ from those where you live and which may offer a lower standard of protection.

Where we transfer data internationally we do so only for the purposes described in this Policy, and we require the recipient by contract to protect it to the standard set out here, to use it only for the specified purpose, and to return or delete it when that purpose ends. Where a transfer is made in response to a lawful request from an authority, we disclose only what the request requires.

7 — How Long We Keep It

We keep personal data only as long as necessary for the purpose it was collected for, and for any period required by law or needed to defend a legal claim.

DATA	RETENTION PERIOD
Identity, verification and KYC records	At least five (5) years from the end of the client relationship, or longer where required.
Transaction, trading and payment records	At least five (5) years from the date of the transaction.
Communications and call recordings	Up to five (5) years, or longer where relevant to an open complaint, investigation, or dispute.
Declined applications	Up to five (5) years, to evidence the decision and prevent repeated non-compliant applications.
Marketing preferences	Until you withdraw consent, and thereafter a minimal record of the withdrawal so that we continue to respect it.
Website and technical logs	Typically up to twenty-four (24) months.

When a retention period ends, data is deleted or irreversibly anonymised. Where deletion is not technically possible from backups, the data is isolated and protected from further processing until deletion occurs in the ordinary backup cycle.

8 — Security

a) Encryption of data in transit and at rest, and segregation of production systems from other environments.

b) Access granted on a least-privilege basis, reviewed periodically, and removed promptly when a role changes or ends.

c) Multi-factor authentication on administrative access to client data.

d) Logging and monitoring of access to client records.

e) Written confidentiality and security obligations imposed on staff and on every processor we appoint.

f) Incident response procedures, including assessment, containment, and notification of affected individuals where an incident is likely to cause them significant harm.

YOUR PART IN THIS

No transmission over the internet is completely secure. You are responsible for keeping your platform and portal credentials confidential, for using a strong and unique password, and for notifying us immediately at support@prime-desk.com if you suspect unauthorised access to your account.

9 — Your Rights

We extend the following rights to every client and applicant, wherever you live, as a matter of policy.

RIGHT	WHAT IT MEANS
Access	To be told what personal data we hold about you and to receive a copy of it.
Rectification	To have inaccurate data corrected and incomplete data completed.
Erasure	To have data deleted where we no longer need it, subject to the limits below.
Restriction	To have processing paused while a dispute about accuracy or legitimacy is resolved.
Objection	To object to processing based on our legitimate interest, and to object to direct marketing at any time.
Portability	To receive the data you provided to us in a structured, commonly used, machine-readable format.
Withdraw consent	To withdraw consent at any time, without affecting processing carried out before the withdrawal.

9.1 Limits on These Rights

We cannot delete records we are required to retain for anti-money-laundering, tax, accounting, or legal purposes, and we cannot delete records needed to establish or defend a legal claim. Where we decline a request in whole or in part, we tell you why. Verification, screening, transaction, and complaint records generally fall within these limits for the retention periods at Section 7.

9.2 How to Exercise Them

Write to **privacy@prime-desk.com** from the email address registered to your account, stating the right you wish to exercise. We may ask you to verify your identity before we act, in order to protect your data from disclosure to someone else. We respond within **thirty (30) days**. Where a request is complex we may extend that period and will tell you before the original period expires.

9.3 There Is No Charge

Exercising these rights is free. Where a request is manifestly unfounded or repetitive, we may charge a reasonable administrative fee or decline it, and we will explain the reason.

9.4 Complaints

If you are not satisfied with how we have handled your data or your request, write to **complaints@prime-desk.com**. Your complaint will be handled under the Complaints Handling Policy. Because the Company is not established in a jurisdiction with a data protection supervisory authority, there is no statutory regulator to whom you may escalate a data protection complaint about us.

10 — Marketing

We send marketing communications where you have consented, or where you are an existing client and the communication concerns services similar to those you already use. Every marketing message contains an unsubscribe mechanism, and you may also opt out at any time by writing to privacy@prime-desk.com. Opting out of marketing does not stop service messages about your account, such as margin notifications, statements, or changes to our terms.

11 — Cookies and Similar Technologies

Our website and portal use cookies and similar technologies to operate the service, remember preferences, and understand how the site is used. The categories used, their purposes, their duration, and how to control them are set out in the **Cookie Policy**, which forms part of this Policy.

12 — Automated Processing

We use automated tools for sanctions and PEP screening, fraud and abuse detection, and the monitoring of trading patterns. These tools may flag an account for review, and a flag may result in a delay, a request for further documentation, or a restriction. **A decision to decline, suspend, or close an account is reviewed by a person before it takes effect**, and you may ask us to explain the outcome and provide further information for reconsideration.

13 — Children

Our services are not offered to anyone under eighteen (18) years of age and we do not knowingly collect data from a minor. Where we learn that we hold such data, we delete it and close any account concerned.

14 — Changes to This Policy

We may amend this Policy. The current version is always published at www.prime-desk.com and is identified by its version number and reference. Where a change materially affects how we use your data, we notify you by email or through the client portal before it takes effect.

CONTACT

Privacy enquiries and rights requests	privacy@prime-desk.com
Client support	support@prime-desk.com
Complaints	complaints@prime-desk.com
Registered office	Top Floor, Rodney Court Building, Rodney Bay, Gros Islet, Saint Lucia LC01 401