

PRIVACY POLICY

Eliprime Finance Limited (“Eliprime”)

Effective: Jan 2026

1. IMPORTANT INFORMATION AND WHO WE ARE

1.1 Who we are

Eliprime Finance Limited (“Eliprime”, “we”, “us”, “our”) collects, uses, and shares personal information when you visit our website or use our services. This Privacy Policy explains:

- what personal information we collect;
- how and why we use it;
- who we share it with;
- how we protect it; and
- your rights and choices.

This Notice applies to:

- visitors to our website;
- prospective clients;
- clients (including institutional/professional counterparties and eligible retail clients subject to strict KYC); and
- business contacts (e.g., vendors, partners, service providers).

1.2 Regulatory disclosure

Eliprime Finance Limited is a Seychelles securities dealer authorized and regulated by the Financial Services Authority of Seychelles (FSA) under Securities Dealer License No. SD 081.

Company Registration Number: 8429443-1

Registered Office: Suite 18, Third Floor, Vairam Building, Providence, Mahé, Seychelles

1.3 Data controller

For the purposes of applicable data protection laws, Eliprime is the “data controller” for personal information collected in connection with our website and services, unless stated otherwise in a specific agreement or notice.

1.4 Updates to this Notice

We may update this Notice from time to time to reflect legal requirements, operational changes, or improvements. We will post the updated version on our website, and where appropriate, notify you through reasonable means.

2. DATA PROTECTION PRINCIPLES

We aim to apply internationally recognized privacy principles (including those reflected in the GDPR) where practicable. In particular, we strive to ensure personal information is:

- a) processed lawfully, fairly, and transparently;
- b) collected for specified and legitimate purposes;
- c) adequate, relevant, and limited to what is necessary;
- d) accurate and kept up to date;
- e) retained only as long as necessary; and
- f) protected by appropriate security measures.

3. PERSONAL INFORMATION WE COLLECT

“Personal information” means information relating to an identifiable individual. It may include:

a) Identity and Profile Data

Name, date of birth, nationality, identification details (e.g., passport/ID), profession, employer, and related onboarding profile information.

b) Contact Data

Email address, telephone number, residential/business address, country of residence, and related contact details.

c) Financial Data

Bank account details, payment information, transaction identifiers, and other financial information required to provide services or meet legal obligations.

d) Transaction Data

Information about services requested or used, order/execution-related records where applicable, deposits/withdrawals, fees/charges, and communications relating to transactions.

e) Usage Data

Information about how you interact with our website, communications, and services.

f) Marketing and Communications Data

Your preferences regarding receiving marketing and service communications and your communication history with us.

g) Technical Data

IP address, browser type/version, device identifiers, time zone, operating system, and similar technical data.

Note: We may also collect information required for KYC/AML/CFT, sanctions screening, fraud prevention, and regulatory reporting.

4. HOW WE COLLECT PERSONAL INFORMATION

We collect personal information in the following ways:

4.1 Information you provide directly

For example, when you:

- complete forms on our website;
- contact us by email, telephone, messaging apps, or other channels;
- request information about our services;
- apply for onboarding;
- submit KYC/AML documentation; or
- enter into a business relationship with us.

4.2 Information collected automatically

When you visit our website, we may collect information automatically through cookies and similar technologies. See our Cookie Policy for details.

4.3 Information from third parties

Where permitted by law and required for compliance, we may obtain information from:

- identity verification providers;
- sanctions/PEP screening providers;
- credit reference agencies (where applicable);
- introducers or business partners (where you consent or where lawful); and
- regulators, law enforcement, or public sources where relevant.

5. HOW WE USE PERSONAL INFORMATION (PURPOSES AND LEGAL BASES)

We process personal information only where we have a lawful basis to do so. Depending on the context, this may include:

- Performance of a contract (to provide services or take steps at your request before entering a contract)
- Legal obligation (KYC/AML/CFT, sanctions, regulatory reporting, record-keeping)

- Legitimate interests (operating and improving our business, security, fraud prevention)
- Consent (where required, e.g., certain marketing communications or cookies)

Common purposes include:

- 1. Onboarding and account setup**
Identity verification, due diligence, suitability/appropriateness checks where applicable, and client administration.
- 2. Providing services (execution-only / liquidity services)**
Operating our systems, supporting clients, processing instructions, handling settlements/payments, and managing service relationships.
- 3. Compliance and risk management**
AML/CFT checks, sanctions/PEP screening, fraud prevention, internal audits, incident management, and regulatory reporting.
- 4. Communications and support**
Responding to enquiries, managing complaints, delivering notices, and providing operational updates.
- 5. Website operations and security**
System administration, troubleshooting, monitoring, security, and prevention of malicious activity.
- 6. Business operations and improvement**
Internal analytics, service enhancements, business planning, and operational efficiency.
- 7. Marketing (where permitted)**
Providing information about our services, events, or updates—subject to your preferences and applicable law.
- 8. Corporate transactions**
If Eliprime undergoes a merger, acquisition, or restructuring, personal information may be used to evaluate and execute the transaction in accordance with law.

6. DISCLOSURE AND SHARING OF PERSONAL INFORMATION

We may share personal information with trusted third parties, including:

- a) Service providers who support our operations (e.g., IT hosting, cybersecurity, CRM, document management, analytics);
- b) Professional advisers (lawyers, auditors, accountants, insurers);
- c) KYC/AML screening and verification providers;
- d) Payment service providers and banks (where required for settlements and payments);
- e) Liquidity and execution counterparties where operationally necessary (typically in aggregated/limited form depending on service design);

- f) Regulators and authorities (including the Seychelles FSA) where legally required;
- g) Courts, tribunals, and law enforcement where required by law; and
- h) Any party you authorise (e.g., via power of attorney or written authorisation).

We do not sell personal information.

7. SECURITY

We implement appropriate technical and organisational measures designed to protect personal information against accidental loss, misuse, unauthorised access, alteration, or disclosure. Measures may include access controls, encryption where appropriate, monitoring, and staff confidentiality obligations.

Access to personal information is restricted to employees and service providers who need it for legitimate business purposes and who are subject to confidentiality duties.

8. INTERNATIONAL TRANSFERS

Eliprime may transfer personal information outside Seychelles where necessary for business operations (for example, where service providers, cloud hosting, verification services, or counterparties are located abroad).

When we transfer personal information internationally, we take reasonable steps to ensure an appropriate level of protection, which may include contractual safeguards and security measures.

9. DATA RETENTION

We retain personal information only for as long as necessary for the purposes described in this Notice, including:

- providing services;
- meeting legal and regulatory obligations (including record-keeping requirements);
- resolving disputes; and
- enforcing agreements.

Retention periods depend on the type of data and applicable legal/regulatory requirements. You may contact us for more information on retention where appropriate.

10. EXAMPLES OF PERSONAL INFORMATION CATEGORIES

Category	Examples
Identity & Profile	Name, DOB, nationality, ID/passport, occupation, onboarding profile
Contact	Email, phone number, residential/business address, country
Financial	Bank details, payment details, settlement identifiers
Transaction	Service usage, fees/charges, transaction history, communications,
Usage	Website interactions, pages visited, time spent, click patterns
Marketing & Communications	Preferences, opt-in/out, marketing history
Technical	IP address, browser/device data, OS, logs

11. YOUR RIGHTS

Depending on your jurisdiction and applicable law, you may have rights such as:

- a) the right to be informed;
- b) the right of access;
- c) the right to rectification;
- d) the right to erasure (in certain circumstances);
- e) the right to restrict processing;
- f) the right to data portability;
- g) the right to object (including to marketing); and
- h) rights relating to automated decision-making and profiling (where applicable).

To exercise your rights, please contact us using the details in Section 12. We may need to verify your identity before responding.

If you have concerns, you may also have the right to lodge a complaint with a relevant data protection authority or regulator.

12. HOW TO CONTACT US

For questions about this Notice or to exercise privacy rights, please contact:

If you have any questions regarding this Cookie Policy or our use of cookies, please contact us:

Email: info@eliprime.com



Registered Office:

Suite 18, Third Floor,

Vairam Building, Providence, Mahé, Seychelles