



# Privacy Policy

How We Collect, Use and Protect Personal Data

Milele Prime Ltd · Effective: August 2026

## 1. Who We Are and Scope

This Privacy Policy explains how Milele Prime Ltd, registered office Ground Floor, Rodney Court Building, Rodney Bay, Gros Islet, Saint Lucia (the "Company", "we") collects, uses, discloses and protects personal data when you visit [www.mileleprime.com](http://www.mileleprime.com), use our platforms and applications, open or operate a trading account, participate in our partner programs, or otherwise interact with us. By using our services you acknowledge the practices described in this Policy. Where applicable law requires consent for specific processing, we will seek it.

## 2. Data We Collect

We collect: (a) identity and contact data (name, date of birth, nationality, identification documents, address, email, phone); (b) verification and compliance data (due diligence results, screening outcomes, source of funds and wealth information, biometric verification results where used); (c) financial data (payment details, deposits and withdrawals, balances); (d) trading data (orders, positions, transaction history, account preferences); (e) technical and usage data (IP address, device identifiers, browser data, log files, session activity, approximate location); (f) communications (emails, chats, call recordings, complaints); and (g) marketing preferences. We may obtain data from you, from your devices, and from third parties such as verification providers, payment institutions, sanctions and fraud databases, introducers and public sources. Providing certain data is a condition of our services; without it we cannot onboard or serve you.

## 3. How and Why We Use Data

We process personal data to: verify identity and perform due diligence; open, operate and secure accounts; execute and record transactions; process payments; detect and prevent fraud, abuse and financial crime; comply with legal, regulatory, tax and sanctions obligations; manage risk; handle complaints and disputes and establish, exercise or defend legal claims; operate, analyze and improve our website, platforms and services; and, subject to applicable law and your preferences, send marketing communications. Depending on applicable law, our legal bases include performance of a contract, compliance with legal obligations, our legitimate interests (including security, risk management, business operation and defense of claims), and consent where required.

## 4. Disclosure of Data

We may share personal data with: our affiliates and group entities; service providers acting on our behalf (identity verification, cloud hosting, platform providers, payment processors, communications, analytics, customer support); liquidity, banking and payment counterparties; professional advisers and auditors; introducers, strictly to the extent of managing the referral relationship; counterparties in any actual or contemplated corporate transaction; and courts, regulators, tax authorities, law enforcement and other public bodies where we consider disclosure required or appropriate. We require service providers to protect data and use it only for the engaged purposes. We do not sell personal data.

## 5. International Transfers and Retention

We operate internationally and may transfer personal data to jurisdictions with different data protection standards from your own. Where required by applicable law, we implement appropriate safeguards for such transfers. We retain personal data for as long as needed for the purposes described, and at least for the minimum periods required by anti-money-laundering, tax, and record-keeping laws (typically five to ten years after the relationship ends), and longer where necessary for legal claims, after which data is deleted or irreversibly anonymized.

## 6. Security

We maintain technical and organizational measures appropriate to the risk, including encryption in transit, access controls, monitoring and staff confidentiality obligations. No system is completely secure, and transmission of data over the internet is at your own risk; to the fullest extent permitted by applicable law, we are not liable for



unauthorized access resulting from events beyond our reasonable control or from compromise of your own devices or credentials. You are responsible for keeping your credentials confidential.

## **7. Your Rights**

Depending on applicable law, you may have rights to access, correct, delete or port your personal data, to object to or restrict certain processing, to withdraw consent, and to complain to a supervisory authority. Requests may be submitted to [info@mileleprime.com](mailto:info@mileleprime.com). We may verify your identity before acting, may charge where permitted for excessive requests, and may retain data notwithstanding a deletion request where retention is required by law or necessary for legal claims, compliance or fraud prevention. Opting out of marketing does not affect service communications.

## **8. Cookies, Automated Decisions and Minors**

We use cookies and similar technologies as described in our Cookie Policy. We may use automated screening and risk-scoring in onboarding, fraud prevention and compliance; where such processing produces legal or similarly significant effects and applicable law grants you rights in relation to it, you may contact us to request review. Our services are not directed at, and we do not knowingly collect data from, persons under 18 (or the higher age of majority in their jurisdiction).

## **9. Changes and Contact**

We may amend this Policy at any time by publishing the updated version on the Website, with effect from publication. Your continued use of the services constitutes acceptance. Contact: [info@mileleprime.com](mailto:info@mileleprime.com) · Milele Prime Ltd, Ground Floor, Rodney Court Building, Rodney Bay, Gros Islet, Saint Lucia.