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Introduction

MMCD Resources Limited (hereinafter referred to as “the Company”), operating under the brand name Direkt Prime Liquidity is a business private limited company incorporated in Seychelles, with company number 8426976-1, and registered address Suite 3, Global Village, Jivan’s Complex, Mont Fleuri, Mahe, Seychelles. The Company is a Securities Dealer Licensee, regulated and authorized by the Financial Services Authority of Seychelles (“FSA”) under the license number SD069.

This Privacy Notice explains how the Company collects personal data about you and how it maintains, uses and discloses that data.

The Company is committed to protecting the privacy of all personal information which is obtained from you, including the information we obtain during your visits to the website and our app. The Company will only use your personal information in accordance with this Privacy Notice.

Collection of Personal Information

We collect information required to open an account, to transact business effectively and to safeguard your assets and your privacy. To do this, we gather information to help us assess your needs and preferences. The information we collect directly from you includes information required to communicate with you, including your name, mailing address, telephone number, e-mail address. We also collect birth date and your location information. All information is collected in accordance with data protection and money laundering legislation.

Data to be collected

While using the Company’s website and/or trading platform and/or App, the Company may derive information from such use and may store this information with your personal profile. This information may include site areas visited, pages viewed, frequency and duration of visits, Internet Protocol (IP) address, your Geographic location, computer identification parameters or version of app used and the date the app was installed, types of transactions conducted, documents downloaded, mouse clicks, mouse movements, scrolling activity as well as text you type in this website and which website referred you to ours or to which websites you link, your internet Access Service provider, type and model of computer or telecommunication device used by website visitor, frequency and duration of sessions per page visit, data and documents of website accessed by website visitor, language preference and preference to receive communication from us.

By entering into a business relationship and in the course of correspondence in physical or electronic form with the Company, we will collect and store personal information about you, as it is required to provide you with the services you requested and to comply with its legal and regulatory obligations. This includes, among others, your date of birth, your address and a photocopy of your national ID card, passport, or other form of ID and a copy of a recent utility bill or other proof of address. We may obtain personal information as a result of authentication or identity checks, including checks with credit reference agencies (who may keep a record of the information) to prevent fraud. TICs (Tax Identification

Codes), country of residence, geo location information, information related to your financial status, such as your bank account/s and Credit Card/s details or other means of payments, the origin of funds, annual income, deposits and withdrawals history, information in regards to funds and financial instruments kept by the Company on your behalf, occupation, details concerning your employment history and education, relevant data and types of transactions conducted, documents downloaded and/or uploaded, phone number and email address.

The Company also collects and processes personal information about you that are necessary for us, in order to provide you with our services. This includes information about you when you complete an online application or another type of form and when you access and trade through your account.

Usage of Personal Information

We use personal information collected from existing and/or prospective clients only as appropriate to render quality service and client security. By doing so, we strictly limit the use of personal data to the purpose for which the informed consent of the individual data subject, to which personal data relates, was given to the Company through the present Privacy Notice. This may include, among other purposes:

- verifications of an identity and contact information
- the setup of a trading account, the issuing of a client account number and a secure password,
- to manage your account and to provide the services to you that you have requested including processing transactions
- to maintain the activity of a client account and client profile
- to contact you when necessary or appropriate in relation to the services being provided to you.
- to keep you updated whilst you are a customer in relation to matters such as contracts you have traded and activities of the Company.
- For marketing purposes, including, but not limited to providing you with information regarding the products and services offered by the Company or its Partners.
- In developing an understanding of the products and services that you may be interested in obtaining from the Company or its Partners.
- To provide you with information or opportunities that we believe may be relevant to you.
- To tailor the website and our app to your needs and interests.
- To create impersonalized statistical data.
- To enforce the governing terms and conditions.
- To conduct surveys and questionnaires.

Maintenance of Records and Security

Record-keeping procedures are in accordance with the applicable regulation. All company's records are maintained for at least seven years from the date of the last transaction between you and the Company or for a longer period as requested by regulatory authorities. In any case, the Company may keep any aggregated or anonymized information for the purposes described in this Privacy Notice, for longer periods. We are aware of the requirement to ensure your data is protected while retaining it, against

accidental loss, disclosure, destruction and or abuse. We have implemented appropriate technical and organizational measures and processes to guard against such breaches. Such measures and safeguards may include encryption during information transmission and storage, strong authentication mechanisms and the segmentation of digital architecture to zones that are policed and protected. We have implemented a strategy of 'least possible access' and periodically review existing access. While such systems and procedures significantly reduce the risk of security breaches and the inappropriate use of personal information, they do not provide absolute security. The Company will regularly review its security posture with reference to the latest standards to effectively eliminate the likelihood of any form of misuse.

Disclosure of Personal Data

We may share personal data within the Company and its partners to meet our contractual and legal obligations. Those with access to personal information are obligated to comply with strict standards of confidentiality and protection of personal information.

The use of your personal information is limited to the purposes identified in our relationship with the recipient of your personal data. The use of the shared information is strictly limited to the performance of the task we request and for no other purpose. All recipients of personal information are obliged to protect personal information in a similar manner to the way we protect personal information.

However, all the disclosures of personal data to third parties are limited to the purpose for which the informed consent of the individual data subject, to which personal data relates, was given to the Company through the present Privacy Notice.

Recipients of Personal Data may be for example:

- Other Companies belonging to our Group of Companies who provide to us outsourcing support services
- Credit reference and fraud prevention agencies
- Companies we have a joint venture or agreement to cooperate with.
- Service providers and specialist advisers who have been contacted to provided us with administrative, IT, analytics, online marketing optimization, financial, regulatory, compliance, insurance, research or other services.
- Third party providers when you use our apps, communication systems and trading platforms, SMS getaways which are provided to us by third parties.
- Payment service providers and banks processing your transactions.
- Auditor or contractors or other advisers auditing, assisting with or advising on any of our business purposes.
- Courts, tribunals and applicable regulatory authorities as agreed or authorised by law or our agreement with you. Successor or assignees or transferees or buyers
- Anyone authorised by you

By accepting this Privacy Notice, you authorize us to share any of your personal data to the above mentioned type of Recipients, for the purposes described above.

Disclosure of Personal Data to Non-Affiliated Third Parties

We do not sell, license, lease or otherwise disclose your personal information to any third party for any reason, except as described below. We may share information with law enforcement agencies, information protection authorities, and other competent authorities as well as with other competent third parties, as may be required by law or regulation or if the Company believes that you performed any act or omission that might be violating any applicable laws, rules, or regulations, or if the Company is obliged, or believes that it is obliged by law to share or disclose your information to applicable authorities or to any other third party. We are further obligated by the applicable law and regulation to allow any Competent Authority to inspect our premises and access our books, records or any other document in our possession that is reasonably considered necessary for such Competent Authority to examine.

We may also disclose your information as necessary to credit reporting or collection agencies, or when necessary to protect our rights or property.

By accepting this Privacy Notice, you authorize us to share any of your personal data to the above mentioned type of Recipients, for the purposes described above.

Statistical Data

The Company may combine your personally identifiable information with information from other users of this website to create impersonalized statistical data for the purposes of monitoring and improving service. The Company may provide this statistical data to third parties. Under no circumstances will you be able to be identified from this statistical data; you will remain anonymous.

Restriction of Responsibility

If at any time you choose to purchase a product or service offered by another company, any personal information you share with that company will no longer be controlled under our Privacy Notice. We are not responsible for the privacy notices or the content of sites we link to and have no control of the use or protection of information provided by you or collected by those sites. Whenever you elect to link to a co-branded Web site or to a linked Web site, you may be asked to provide registration or other information. Please note that the information you are providing is going to a third party and you should familiarize yourself with the privacy notice provided by that third party.

Google Analytics

We may use the information we collect to assist us in delivering relevant ads to you (Remarketing). Remarketing is a way for us to connect with our websites and ads visitors, based upon their past interactions with our website and ads. Third-party marketing vendors may be hired by the Company to perform such remarketing services. As a result, third-party vendors, including Google, may show

Company' ads on internet sites. Such third-party vendors, including Google, may also use their cookies, third party cookies and similar technologies to serve ads based on a visitor's prior visits to the Company's website. You may opt out of Google Analytics for Display Advertisers and opt out of customized Google Display Network ads by visiting Google's Ads Preferences Manager. You are also encouraged to visit [Google Analytics Opt-out Browser Add-on](#). For further information you can also visit [Google's privacy center](#).

Use of Cookies

A cookie is a small text file stored on the user's computer for record keeping and security purposes. It allows us to enhance user experience while browsing our website. The Company issues cookies upon landing on our website unless the cookie settings on user's browsers are disabled. Please be notified that by turning off cookie tracking in your browser, some of our services might become unusable such as promotions or registration. Cookies used by us do not contain any personal information nor do they contain account or password information. They merely allow the site to recognize that a page request comes from someone who has already logged on. To manage, control and improve our web site, we may use a third party to track and analyze usage and statistical volume information, including page requests, form requests, and click paths. The third party may use cookies to track behavior and may set cookies on behalf of us. These cookies do not contain any personally identifiable information.

Transfer of Data to third countries

You acknowledge that the Company, by its nature as an online service, may store and process information in various sites, throughout the globe. If you are a resident in a jurisdiction such as European Economic Area Member States, where transfer of your personal information to another jurisdiction requires your consent, then you provide us your express and unambiguous consent to such transfer.

The Company has outsourced a number of its record keeping activities to its sister entities that are under the same ownership and/or control and are located in the European Economic Area and adherent to the European General Data Protection Regulation ("GDPR"). Consequently, the Company have concluded in a Data Processing Agreement with such entities as required and any processing activities undertaken by the sister entities on behalf of the Company are in accordance with the GDPR.

Marketing communication

While registering your information with us, you have agreed to receive marketing services, which provides you with information regarding the products and services offered by the Company or its partners and opportunities that we believe may be relevant to you, newsletters, emails and SMS (text) messages, and other electronic communication. If you no longer wish to receive the above-mentioned types of communication, you may opt-out by following the instructions included in each message or by sending an email to dataprotection@rostro.com .

Your Rights

You need not give us any of the personal information requested by the Company. However, without the information requested in the application form or otherwise, we may not be able to open an account for you, or to provide you with any other services, information, or assistance you have sought or evaluate the appropriateness of the service you are requesting.

At any time, you have the right to be informed whether the Company is processing your Personal Data and if so, to request a copy of your Personal Data the Company holds.

If you have a request to receive a copy of the data we retain about you, please write to the Company, verifying your identity and setting out in full what information you require. We will charge a fee as allowed by applicable law to cover the cost of verifying the application and locating, retrieving, reviewing, and copying any material requested.

Where we rely on your consent to process certain personal data, you can withdraw such consent at any time by contacting dataprotection@rostro.com . You may also request from the Company to rectify your Personal Data in order to correct, complete or update the provided Personal Data

You may further inform the Company at any time that you wish to delete the personal information we hold about you by emailing us at dataprotection@rostro.com. We will change or delete your personal information in accordance with your instructions, except to the extent that we are required to hold your personal information for regulatory or legal purposes, to provide you with the services you have requested or to maintain adequate business records. The Company is doing its utmost to comply with this Privacy Notice.

If you have any questions, concerns or complaints regarding this Notice and the enforcement thereof, please refer them to: dataprotection@rostro.com . After receiving your complaint, the Company may contact you to better understand your concerns and will make all efforts to promptly answer your question or resolve your complaint to your full satisfaction.

Changes to This Privacy Notice

From time to time, we may update this Privacy Notice. In the event we materially change this Privacy Notice, the revised Privacy Notice will promptly be posted to the Company's websites and we will post a notice on our websites informing you of such change. You agree to accept posting of a revised Privacy Notice electronically on the website as actual notice to you. Any dispute over our Privacy Notice is subject to this notice and our Terms and Conditions. We encourage you to periodically check back and review this notice so that you always will know what information we collect, how we use it, and to whom we disclose it. If you have any questions about this Notice, please contact us at dataprotection@rostro.com .