



Privacy Policy

PU Prime Financial Services LLC

Licensed Activity: Capital Market Authority (CMA) Category 5 (Introduction and Promotion)

Licence No.: 20200000388

Email: info@puprime.ae

Web: www.puprime.ae

Address: The Prime Tower, Office No. 1209, Business Bay, Plot No. 68-0, Makani No. 25836 86879, Dubai, UAE

1. Introduction

PU Prime Financial Services L.L.C (“**PUPFS**”, the “**Company**”, “**we**”, “**us**”, or “**our**”) is committed to protecting your privacy and the confidentiality of your personal data. As a company licensed by the Capital Market Authority (“**CMA**”) of the United Arab Emirates to conduct Category 5 regulated activities as an Introducer and Promoter (License No. 20200000388), we are governed by applicable UAE laws, including the Federal Decree Law No. 45 of 2021 on Personal Data Protection (“**PDPL**”), as may be amended from time to time.

This Privacy Policy describes how we collect, use, disclose, and protect your personal data when you interact with our website, digital channels, or promotional activities.

2. Types of Personal Data We Collect

In the course of your interaction with the Company, we may collect, process, store, use, disclose, transfer, and otherwise handle certain categories of personal data to fulfil our legitimate business and regulatory functions in accordance with applicable data protection laws and regulations.

We collect personal data only where there is a lawful basis to do so, including your consent, the performance of a contract, compliance with legal obligations, or our legitimate business interests, provided such interests are not overridden by your rights and freedoms.

The types of personal data we may collect include, but are not limited to:

a. Contact Information

- Full name
- Email address
- Mobile or landline phone number
- Company or organization (if applicable)
- Job title or professional role (where relevant)
- Mailing or business address (if voluntarily provided)

This information is typically collected when you complete a contact form, subscribe to our updates, register for events or services, or engage with us through our promotional materials or digital channels.

We may also collect contact information when you communicate with us directly via email, telephone, social media platforms, or other official communication channels.

b. Identification Details

- Emirates ID number
- Passport number
- Nationality
- Date of birth

This data may be collected only when voluntarily submitted, such as during a request to be introduced to a third-party financial institution, or when verifying your eligibility for services restricted to certain investor classifications.

Where required by law, this information may be collected for identity verification, anti-money laundering (AML), counter-terrorism financing (CTF), know-your-customer (KYC), fraud prevention, sanctions screening, or other regulatory compliance purposes.

Identification data is processed with enhanced security safeguards and retained only for as long as necessary to meet legal, regulatory, or contractual obligations.

c. Submitted Information

- Data shared through inquiry forms, feedback surveys, event registration, or downloadable content requests
- Information regarding your investment interests or areas of inquiry
- Communications, correspondence, and records of interactions with us
- Preferences relating to marketing communications and service interests

We use this information to tailor our responses, offer relevant promotional content, and improve the quality of our communication.

d. Website and Usage Data

We may automatically collect certain technical and usage-related information when you access or interact with our website, applications, or digital platforms, including:

- IP address and device identifiers
- Browser type and version
- Pages visited and time spent on each page
- Date and time of website access
- Referring website (if applicable)
- Operating system, device type, and screen resolution
- Unique device identifiers, cookies, tracking pixels, and similar technologies
- Log files, diagnostic data, crash reports, and performance data

This information may be collected through cookies and similar tracking technologies. Where required by applicable law, we will obtain your consent prior to placing non-essential cookies on your device.

This data helps us analyse traffic, monitor user behaviour, detect technical issues, and optimize user experience on our website.

In addition, we use this information for cybersecurity monitoring, fraud detection, system administration, analytics, performance measurement, and to protect the integrity and security of our digital infrastructure.

Website and usage data may be aggregated and anonymized for statistical and business intelligence purposes. Where data can reasonably be linked to an identifiable individual, it will be treated as personal data and protected accordingly.

e. Marketing and Communication Preferences

We may collect and maintain information relating to your communication and marketing preferences, including:

- Your preferred method of communication (e.g. email, phone)
- Consent to receive promotional or informational content
- Record of past interactions (e.g. opened emails, downloads, click-through rates)
- Subscription status, opt-in/opt-out history, and consent timestamps
- Responses to marketing campaigns, event participation history, and content engagement behaviour

We use this data to manage subscription preferences and ensure compliance with marketing consent requirements under UAE law.

Marketing communications will only be sent where we have a lawful basis to do so, including your prior consent where required. You may withdraw your consent or update your communication preferences at any time by using the unsubscribe mechanism included in our communications or by contacting us directly.

We maintain records of consent and communication preferences to demonstrate compliance with applicable data protection and electronic communications laws.

We do not sell your personal data to third parties for their independent marketing purposes.

We use this data to manage subscription preferences and ensure compliance with marketing consent requirements under UAE law.

Additionally, we may use submitted information for internal analysis, service improvement, compliance monitoring, dispute resolution, and the protection of our legal rights.

We do not collect more personal data than is reasonably necessary for the purposes described above. Where sensitive personal data is collected, we will do so only where legally permitted and subject to appropriate safeguards.

Personal data may be stored in secure electronic systems and, where necessary, physical records. We implement appropriate technical and organizational measures designed to protect personal data against unauthorized access, loss, misuse, alteration, or disclosure.

3. Sensitive Personal Data

3.1 Special Categories of Personal Data

The Company does not intentionally collect, solicit, or otherwise process “Special Categories of Personal Data” (also referred to as sensitive personal data) as defined under UAE Federal Decree Law No. 45 of 2021 on the Protection of Personal Data and its implementing regulations.

For the avoidance of doubt, Special Categories of Personal Data include, without limitation:

- Data concerning health or medical conditions;
- Religious or philosophical beliefs;
- Biometric or genetic data used for identification purposes;
- Political opinions or affiliations;
- Data relating to criminal convictions or offences;
- Any other category of data designated as sensitive under applicable UAE law.

Data subjects are expressly requested not to transmit, disclose, or otherwise make available any Special Categories of Personal Data through the Company’s website, contact forms, electronic communications, promotional channels, or any other medium of interaction.

In the event that such data is inadvertently submitted or received, the Company shall, to the extent legally permissible, take reasonable steps to securely delete, anonymize, or restrict the processing of such data without undue delay, unless retention or processing is required to comply with a legal or regulatory obligation.

Where the processing of Special Categories of Personal Data becomes strictly necessary pursuant to applicable law, such processing shall be undertaken in accordance with the conditions prescribed under UAE data protection legislation and subject to enhanced technical and organizational safeguards.

3.2 Lawful Basis of Processing

The Company processes personal data in accordance with UAE Federal Decree Law No. 45 of 2021, its executive regulations, and other applicable laws and regulatory requirements. All processing activities are conducted strictly within the scope of the Company’s licensed

activities under the Capital Market Authority (CMA) as a Category 5 licensed entity authorized to act as an Introducer and Promoter.

The Company does not act as an investment adviser, portfolio manager, broker, custodian, financial institution, or discretionary asset manager. Accordingly, personal data is processed solely to the extent necessary to carry out lawful introduction and promotional activities permitted under its regulatory authorization.

Personal data shall be processed on one or more of the following lawful bases, as applicable:

- The data subject's consent;
- The implementation of pre-contractual measures undertaken at the data subject's request;
- Compliance with a legal or regulatory obligation to which the Company is subject;
- The pursuit of legitimate interests of the Company, provided such interests do not override the rights and freedoms of the data subject.

3.3 Purposes of Processing

The Company processes personal data for the following specified, explicit, and legitimate purposes:

(a) Responding to Inquiries and Information Requests

Personal data, including contact details and communication content, may be processed for the purpose of responding to inquiries, requests for information, and general correspondence submitted through the Company's website, email communications, or marketing initiatives. Such responses may include the provision of information concerning:

- Financial products or services offered by licensed third-party institutions;
- Educational materials, seminars, events, or webinars;
- The Company's regulatory status and the nature of its introduction services.

All communications are provided strictly on an informational and promotional basis and shall not constitute investment advice, financial recommendations, or suitability assessments within the meaning of applicable CMA regulations.

(b) Facilitating Introductions to Licensed Third Parties

As a CMA Category 5 licensed entity, the Company is authorized to introduce prospective clients to financial institutions regulated by competent supervisory authorities.

Personal data submitted by a data subject may be processed for the purposes of:

- Assessing the data subject's expressed area of interest;
- Conducting preliminary qualification checks where required by applicable regulation;
- Facilitating contact with an appropriately licensed third-party provider.

Any such introduction shall be conducted strictly on a non-advisory and non-discretionary basis and in accordance with the data subject's consent and stated preferences.

The Company may also process personal data for referral attribution, commission verification, regulatory supervision, compliance monitoring, internal audits, inspections and reporting obligations connected with its Category 5 licensed activities.

The Company does not conduct investment suitability assessments, provide personalized financial advice, execute transactions, or manage client funds or assets. Any regulated financial service shall be provided directly by the relevant licensed third-party institution, which shall be independently responsible for its own regulatory and data protection obligations.

Where personal data is disclosed to a licensed third party for the purposes of effecting an

introduction, such disclosure shall be limited to what is necessary and carried out subject to appropriate confidentiality and data protection safeguards.

(c) Management of Communications and Records

The Company may process personal data to maintain accurate and up-to-date records of:

- Communication preferences;
- Consent status and opt-in/opt-out history;
- Engagement history and correspondence records.

Such processing is undertaken to ensure regulatory compliance, maintain adequate records for audit and inspection purposes, and ensure that communications remain aligned with the data subject's expressed preferences.

Personal data shall be retained only for such period as is necessary to fulfill the purposes described herein or to comply with applicable legal and regulatory obligations.

(d) Website Analytics and User Experience Optimisation

The Company may process anonymised, aggregated, and/or pseudonymised usage data, including IP address, device information, and session activity, for the purposes of:

- Monitoring website performance and operational integrity;
- Identifying, preventing, and resolving technical issues or security vulnerabilities;
- Analysing user behaviour and navigation patterns;
- Improving website functionality, structure, and content;
- Enhancing cybersecurity protections and safeguarding digital infrastructure.

Where such data may reasonably be linked to an identifiable individual, it shall be treated as personal data and processed in accordance with applicable law.

(e) Legal and Regulatory Compliance

The Company may process personal data to the extent necessary to:

- Comply with applicable UAE laws and regulatory requirements, including those issued by the CMA, the UAE Central Bank, and other competent authorities;
- Respond to lawful requests, investigations, subpoenas, or regulatory directives;
- Maintain adequate records for compliance, audit, reporting, inspection, or regulatory review purposes;
- Satisfy obligations relating to Know Your Client (KYC), Anti-Money Laundering (AML), counter-terrorism financing, sanctions screening, and marketing consent documentation, where applicable.

Processing undertaken to comply with legal or regulatory obligations may continue notwithstanding withdrawal of consent where such processing is mandated by law.

3.4 Regulatory Limitations

For the avoidance of doubt:

- The Company does not provide investment advice, portfolio management, brokerage, custody, or financial planning services;
- The Company does not execute trades, process financial transactions, or hold client funds or assets;
- The Company does not conduct investment suitability assessments;
- The Company does not engage in automated decision-making or profiling that produces legal or similarly significant effects on individuals;

- The Company does not sell, rent, trade, or otherwise commercially exploit personal data.

All processing activities are conducted lawfully, fairly, transparently, and proportionately, and strictly within the limits of the Company's CMA licensing permissions and applicable UAE data protection legislation.

4. Legal Basis for Processing

The processing of personal data by the Company is conducted in strict accordance with UAE Federal Decree Law No. 45 of 2021 on the PDPL, its implementing regulations, and all applicable regulatory requirements imposed by CMA and other competent authorities.

The Company processes personal data only where a lawful, specific, and legitimate basis for such processing exists. The applicable legal basis will depend on the nature of the data subject's interaction with the Company and the purposes for which the data is collected.

Processing activities may be undertaken on one or more of the following lawful grounds:

4.1 Consent

In certain circumstances, the Company processes personal data on the basis of the data subject's clear, informed, and unambiguous consent.

This may include, without limitation:

- Subscribing to marketing communications, newsletters, or promotional materials;
- Submitting inquiries or personal information through website contact forms or electronic communications;
- Requesting an introduction to a licensed third-party financial institution;
- Consenting to the use of non-essential cookies or tracking technologies, where applicable.

Where consent constitutes the lawful basis for processing, the data subject retains the right to withdraw such consent at any time by contacting the Company using the details set out in this Privacy Policy or by utilizing any available unsubscribe mechanism.

Withdrawal of consent shall not affect the lawfulness of any processing conducted prior to such withdrawal. However, withdrawal may limit or prevent the Company from providing certain information, facilitating introductions, or delivering specific services dependent upon that consent.

4.2 Legitimate Interests

The Company may process personal data where such processing is necessary for the purposes of its legitimate interests, provided that such interests are not overridden by the data subject's rights, freedoms, and reasonable expectations of privacy.

Such legitimate interests may include:

- Conducting CMA-authorized promotional activities relating to regulated financial products or services offered by duly licensed third-party institutions;
- Facilitating lawful introduction services within the scope of the Company's Category 5 license;
- Enhancing website functionality, user experience, and system performance through analytics and performance monitoring;
- Maintaining internal records, correspondence logs, and engagement histories;
- Protecting the security, integrity, and lawful operation of the Company's website,

systems, and business operations;

- Establishing, exercising, or defending legal claims.

Prior to relying on legitimate interests as a legal basis, the Company undertakes an assessment to ensure that such interests are proportionate, necessary, and balanced against the data subject's fundamental rights and freedoms.

4.3 Compliance with Legal and Regulatory Obligations

The Company may process personal data where such processing is necessary to comply with legal and regulatory obligations to which it is subject as a UAE-licensed entity.

This may include, without limitation:

- Maintaining accurate and complete records for audit, inspection, or regulatory review by the CMA or other competent authorities;
- Demonstrating compliance with applicable CMA regulations, UAE federal laws, and implementing regulations;
- Responding to lawful requests, directives, subpoenas, or investigations initiated by regulatory, judicial, or governmental authorities;
- Complying with obligations relating to Anti-Money Laundering (AML), Counter-Terrorism Financing (CTF), sanctions screening, and related compliance frameworks;
- Retaining documentation evidencing marketing consent and regulatory compliance.

Where processing is required to comply with legal or regulatory obligations, such processing may be undertaken without the data subject's consent and may continue notwithstanding any withdrawal of consent, to the extent permitted or required by applicable law.

4.4 Additional Legal Grounds

Where applicable, the Company may also process personal data where:

- Processing is necessary to implement pre-contractual measures taken at the request of the data subject;
- Processing is necessary for the establishment, exercise, or defense of legal claims;
- Processing is otherwise permitted or required under applicable UAE law.

The Company ensures that all processing activities are conducted lawfully, fairly, transparently, and in a manner that is proportionate to the purposes for which the data is collected, and strictly within the limits of its CMA licensing permissions.

5. Disclosure to Third Parties

The Company respects the confidentiality of personal data and is committed to ensuring that any disclosure thereof is undertaken lawfully, proportionately, and in accordance with applicable regulatory requirements imposed by CMA and other competent authorities.

Personal data shall be disclosed only where such disclosure is necessary for legitimate business purposes, the performance of licensed activities, compliance with legal or regulatory obligations, or at the express request or direction of the data subject.

Where personal data is disclosed, the Company shall take reasonable steps to ensure that such disclosure is limited to the minimum data necessary for the relevant purpose and subject to appropriate confidentiality and data protection safeguards.

Personal data may be disclosed to the following categories of recipients:

5.1 Licensed Financial Institutions

The Company may disclose personal data to third-party financial institutions or financial service providers that are:

- Duly licensed and regulated by the CMA, the Central Bank of the UAE, or another competent supervisory authority; and
- Introduced to the data subject solely upon the data subject's request or consent, for the purpose of exploring or obtaining information regarding financial products or services.

Such institutions operate as independent data controllers and shall process personal data in accordance with their own privacy policies, regulatory obligations, and internal compliance frameworks.

In particular, as part of its CMA-authorized introduction and promotion activities, the Company may share personal data with PU Prime Limited, a regulated financial institution incorporated in Mauritius, where such sharing is necessary for:

- facilitating client introductions;
- onboarding and account opening processes;
- referral attribution and commission verification;
- regulatory compliance monitoring;
- responding to audits, inspections, investigations or regulatory requests;
- AML, sanctions, fraud prevention and risk management purposes;
- complaint handling and dispute resolution;
- maintaining accurate records relating to the introduction relationship.

Such disclosures shall be limited to information reasonably necessary for the relevant purpose and shall be subject to appropriate confidentiality, security and data protection safeguards.

The Company does not control the subsequent processing activities undertaken by such third parties once an introduction has been effected. Data subjects are encouraged to review the privacy notices of any third-party institution prior to engaging with its services.

5.2 Authorised Third-Party Service Providers (Processors)

The Company may engage external service providers to support its operational, technical, and administrative functions. Such service providers may assist with, without limitation:

- Digital marketing and promotional campaigns conducted within the scope of CMA-authorized activities;
- Website analytics, performance monitoring, and cybersecurity measures (including the use of analytics tools or similar technologies);
- IT hosting, data storage, infrastructure management, and cloud-based services;
- Customer relationship management systems and communication platforms.

Where such service providers process personal data on behalf of the Company, they shall do so strictly as data processors and solely in accordance with the Company's documented instructions.

All such third parties are contractually bound by data processing agreements incorporating appropriate confidentiality obligations, technical and organizational security measures, and compliance requirements consistent with the PDPL and applicable regulatory standards.

The Company undertakes reasonable due diligence to ensure that its processors implement

adequate safeguards to protect personal data against unauthorized access, disclosure, alteration, or destruction.

5.3 Legal, Regulatory, and Governmental Authorities

The Company may disclose personal data to governmental, supervisory, judicial, or regulatory authorities where such disclosure is necessary to:

- Comply with a legal obligation, statutory requirement, court order, or official directive;
- Respond to lawful requests, investigations, inspections, or supervisory reviews conducted by competent authorities, including the CMA or the Central Bank of the UAE;
- Demonstrate compliance with applicable laws, including marketing regulations, consent documentation requirements, Anti-Money Laundering (AML), Counter-Terrorism Financing (CTF), or sanctions-related obligations;
- Establish, exercise, or defend legal rights or claims;
- Protect the security, integrity, and lawful operation of the Company's business, systems, or digital platforms.

Any such disclosure shall be limited to what is strictly necessary to fulfill the applicable legal or regulatory requirement and shall be conducted with due regard to confidentiality and data protection principles.

5.4 No Sale or Commercial Exploitation of Personal Data

The Company does not sell, lease, rent, trade, or otherwise commercially exploit personal data for monetary or other valuable consideration.

Personal data is not disclosed for the purposes of data brokerage, unsolicited third-party advertising, or unauthorized profiling.

5.5 Safeguards and Accountability

The Company endeavours to ensure that any third party receiving personal data maintains a level of data protection and information security that is substantially equivalent to that required under the PDPL and applicable regulatory standards.

Where personal data is transferred to third parties, the Company implements appropriate contractual, technical, and organizational safeguards designed to ensure lawful processing and the continued protection of data subject rights.

All disclosures are carried out in a manner that is lawful, fair, transparent, and proportionate to the purpose for which the personal data was originally collected.

6. Cross-Border Transfers

While the Company primarily processes personal data within the UAE, certain operational, technical, or regulatory circumstances may require the transfer of your personal data to recipients outside the UAE, such as:

- Cloud service providers or IT infrastructure vendors located in other jurisdictions;
- Licensed financial institutions or third-party partners operating internationally;
- Data processors or affiliates providing analytics, security, or support services on our behalf.

Specifically, personal data may be transferred outside the UAE to PU Prime Limited in Mauritius and to its authorised service providers where necessary for the purposes described in this Privacy Policy. Such transfers are subject to appropriate contractual, technical and organisational safeguards designed to ensure compliance with applicable UAE data protection

requirements.

In all cases where your personal data is transferred across borders, we take all necessary steps to ensure that such transfers comply with the requirements of the PDPL and relevant regulatory guidance. These steps may include:

- Ensuring that the receiving country provides an adequate level of data protection as determined by the UAE Data Office;
- Entering into data transfer agreements or standard contractual clauses with the receiving party, which impose legally binding obligations to protect your data in accordance with UAE standards;
- Requiring the recipient to implement appropriate technical and organizational measures to safeguard your personal information from unauthorized access, misuse, loss, or disclosure;
- Limiting the scope of data shared to only what is necessary for the specified purpose.

You will not be subject to any data transfer that exposes your personal information to undue risk. We remain responsible for ensuring that your data is protected regardless of where it is stored or processed. Additionally, you retain your full rights under the PDPL, including the right to request details about how and where your personal data is stored or transferred.

7. Data Retention

The Company retains personal data only for as long as necessary to fulfill the legitimate purposes for which it was collected, in accordance with UAE Federal Decree Law No. 45 of 2021 (PDPL), applicable CMA regulations, and other relevant legal or regulatory obligations.

Retention periods are determined based on:

- The nature of the interaction (e.g., inquiry, marketing subscription, or introduction request);
- The type and sensitivity of the personal data;
- Applicable legal, regulatory, audit, or statutory requirements;
- The need to establish, exercise, or defend legal claims.

In general:

- Personal data processed for communication or marketing purposes is retained for the duration of the relationship or until consent is withdrawn, subject to any overriding legal obligations;
- Personal data retained for compliance, audit, AML/CTF, or regulatory purposes may be retained for longer periods as required under UAE law or CMA regulations.

Where retention is required by law or regulation, such processing may continue notwithstanding withdrawal of consent.

Upon expiry of the applicable retention period, personal data will be securely deleted, irreversibly anonymized, or securely archived in accordance with appropriate technical and organizational safeguards to prevent unauthorized access, use, or disclosure.

8. Your Rights

Subject to the provisions of UAE Federal Decree Law No. 45 of 2021 on the PDPL, its implementing regulations, and any applicable guidance issued by the UAE Data Office or the CMA, data subjects may have certain statutory rights in relation to their personal data.

These rights are intended to ensure transparency, accountability, and lawful processing of

personal data.

Depending on the circumstances and subject to applicable legal limitations, you may be entitled to exercise the following rights:

- **Right of Access** – To request confirmation as to whether the Company processes personal data relating to you and, where applicable, to obtain a copy of such data together with information regarding the purposes of processing, categories of data concerned, and any recipients to whom the data has been disclosed.
- **Right to Rectification** – To request the correction, updating, or completion of inaccurate, incomplete, or outdated personal data held by the Company.
- **Right to Withdraw Consent** – Where processing is based on your consent (including, for example, marketing communications), to withdraw such consent at any time. Withdrawal shall not affect the lawfulness of processing carried out prior to the withdrawal.
- **Right to Erasure** – To request the deletion of personal data where it is no longer necessary for the purposes for which it was collected or otherwise processed, subject to statutory retention requirements and regulatory obligations under UAE law.
- **Right to Object** – To object to processing carried out on the basis of legitimate interests, where there are grounds relating to your particular situation, and where your rights and freedoms override the Company's legitimate interests.

The exercise of the above rights is subject to limitations and exemptions permitted under applicable UAE law, including circumstances where processing is required to comply with legal, regulatory, audit, or record-keeping obligations.

For any queries on the above, please contact us at: compliance@puprime.ae

For the purpose of verifying your identity and safeguarding personal data against unauthorised access or disclosure, the Company may request reasonable additional information or documentation (such as a copy of a valid identification document).

The Company shall respond to valid and verified requests within the timeframes prescribed under applicable UAE data protection legislation. Where a request cannot be fulfilled, in whole or in part, the Company will provide an explanation in accordance with applicable legal requirements.

9. Cookies and Tracking Technologies

The Company utilises cookies and similar tracking technologies on its website and digital platforms to support lawful business operations and enhance user functionality.

Such technologies may be used to:

- Facilitate website functionality, navigation, and user session management;
- Improve user experience and website performance;
- Analyze traffic patterns, engagement metrics, and system performance;
- Store user preferences (such as language or regional settings);
- Support cybersecurity monitoring and fraud prevention measures.

Cookies may include session cookies, persistent cookies, analytics cookies, and other tracking technologies deployed either directly by the Company or by authorized third-party service providers acting on its behalf.

Where required under applicable law, non-essential cookies shall be deployed only upon obtaining the user's prior consent.

Users may manage or disable cookies through their browser settings or through any cookie management tools made available on the website. However, disabling certain cookies may

impair website functionality, limit access to specific features, or adversely affect the user experience.

Further details regarding the types of cookies used, their purposes, and applicable retention periods are set out in the Company's Website Terms of Use.

10. Data Security

The Company implements appropriate administrative, technical, and organizational measures designed to protect personal data against unauthorized or unlawful access, disclosure, alteration, misuse, loss, or destruction, in accordance with the requirements of UAE Federal Decree Law No. 45 of 2021 and applicable regulatory standards.

Such measures include, without limitation:

- Data encryption in transit and, where appropriate, at rest;
- Role-based access controls and authentication mechanisms;
- Network security safeguards, including firewalls and intrusion detection systems;
- Continuous system monitoring and vulnerability management;
- Secure hosting environments and infrastructure controls;
- Confidentiality undertakings and data protection training for authorized personnel.

Access to personal data is granted strictly on a need-to-know basis and limited to authorised personnel whose responsibilities require such access. The Company maintains access controls, user permission reviews, monitoring mechanisms and audit logs designed to prevent unauthorised access, use or disclosure of personal data.

Where third-party service providers are engaged to process personal data, the Company implements appropriate contractual safeguards to ensure compliance with applicable data protection laws and information security standards.

Notwithstanding the foregoing, no method of transmission over the internet or electronic storage system can be guaranteed to be entirely secure. While the Company applies industry-recognized security practices and maintains ongoing risk assessments, it cannot warrant absolute security.

In the event of a personal data breach that is likely to result in a risk to the rights and freedoms of data subjects, the Company shall take appropriate remedial action and notify affected individuals and competent authorities in accordance with applicable legal and regulatory requirements.

11. External Links

The Company's website may contain links to third-party websites, platforms, or services that are not owned, operated, or controlled by PU Prime Financial Service L.L.C. This Privacy Policy applies exclusively to the Company's own website and data processing activities. The Company does not exercise control over, and shall not be responsible for, the privacy practices, data protection standards, content, security measures, or policies of any third-party websites or services.

Where you access a third-party website through a link provided on our platform, any personal data you submit will be processed in accordance with that third party's privacy policy and terms of use. Such third parties act as independent data controllers.

The inclusion of any external link does not constitute endorsement, approval, or representation by the Company regarding the content, security, or compliance practices of such third-party platforms. Users are strongly advised to review the privacy policies, cookie policies, and terms of use of any external website prior to disclosing personal data or engaging with their services.

12. Consent

By accessing or using the Company's website or engaging with its services, you acknowledge that you have read and understood this Privacy Policy.

Where processing is based on consent in accordance with applicable law, your submission of personal data or affirmative action (such as subscribing to communications or submitting an inquiry) shall constitute your informed and voluntary consent to the collection, use, processing, and disclosure of your personal data as described herein.

Where consent is not the legal basis for processing, personal data shall be processed in accordance with the alternative lawful bases set out in this Privacy Policy and applicable legislation. Your continued use of the Company's website or services following any updates to this Privacy Policy shall constitute acknowledgment of the revised terms, to the extent permitted by applicable law.

Nothing in this section shall limit your statutory rights under the PDPL, including the right to withdraw consent where consent is the applicable legal basis.

13. Amendments

The Company reserves the right to amend, modify, or update this Privacy Policy from time to time to reflect changes in legal, regulatory, operational, or business requirements, including amendments to UAE data protection laws or CMA regulations.

Any revised version of this Privacy Policy shall be published on the Company's website and shall indicate the effective date of the latest revision. Where material changes are made that significantly affect the manner in which personal data is processed, the Company will take reasonable steps to provide appropriate notice, where required by applicable law.

Continued use of the website or services following the publication of an updated Privacy Policy shall constitute acknowledgment of the revised terms, subject to any mandatory consent requirements under applicable law.