



General Data Protection Regulation

Version 1.0 – November 2025

By accepting this document on the General Data Protection Regulation policy, you acknowledge and confirm that our official legally binding language is English. In the event of any discrepancy or inconsistency between any documentation, information and communications in any other language other than English, the English documentation, information and communications shall prevail.

1. Overview

The General Data Protection Regulation (EU) 2016/679 ("GDPR") replaces Directive 95/46/EC and harmonises data protection across the EU/EEA. It governs the protection of natural persons with regard to the processing of personal data and the free movement of such data.

River Prime Europe Ltd ("the Company") is committed to full compliance with the GDPR and applicable Cyprus data protection law.

2. Data Controller & Contact

Controller: River Prime Europe Ltd

Email for GDPR requests: compliance@riverprime.eu

3. What Personal Data We Process (examples)

- Identification & contact data (name, ID/Passport, address, email, phone, date of birth).
- KYC/AML information and supporting documents.
- Financial and transactional data (account/wallet details, deposits/withdrawals, trade history).
- Technical data (IP address, device identifiers, log data, cookies - see Cookie Policy).
- Communications and recordings of telephone/e-communications (MiFID II).

4. Purposes & Legal Bases

We process personal data only when a legal basis applies:

- Performance of a contract (account opening, platform access, trade execution).
- Legal obligations (MiFID II/CySEC directives, AML/CFT, tax, accounting, call recording).
- Legitimate interests (security, fraud prevention, service improvement; balanced against your rights).
- Consent (e.g., marketing communications, certain cookies). You may withdraw consent at any time.

5. Your GDPR Rights

You have the following rights, subject to conditions in Articles 12-23 GDPR:

- Right of access to your personal data and related information.
- Right to rectification of inaccurate or incomplete data.
- Right to erasure (“right to be forgotten”).
- Right to restriction of processing.
- Right to data portability (machine-readable copy).
- Right to object to processing (including direct marketing).
- Rights in relation to automated decision-making, including profiling (where applicable).
- Right to withdraw consent at any time (where processing is based on consent).
- Right to lodge a complaint with a supervisory authority (see Section 10).

6. Access (What Information You’re Entitled To)

Upon request, we will confirm whether we process your data and provide: purposes, categories, recipients, retention, source (if not collected from you), existence of automated decision-making (and logic/impact, where applicable), and details of any third-country transfers and safeguards.

7. Retention

We retain personal data only as long as necessary for the purposes collected and to meet legal/regulatory obligations. Typical periods include:

- MiFID II records (incl. call recordings): at least 5 years (extendable to 7 years by CySEC).
- AML/CFT records: generally, 5 years after the end of the business relationship/occasional transaction.
- Marketing data: until you withdraw consent or object. We do not delete all data automatically upon request where legal obligations require retention.

8. Disclosures & International Transfers

We may share data with:

- Group entities (if any), service providers/processors (IT, hosting, KYC/AML, payments), banks, auditors, legal advisors.
- Regulators and authorities (e.g., CySEC), law enforcement, courts, the Investor Compensation Fund (if applicable).

If data is transferred outside the EEA, we use adequacy decisions or Standard Contractual Clauses (SCCs) and implement supplementary safeguards where required.

9. Automated Decisions / Profiling

We may use risk-scoring and fraud/AML screening tools. We do not make decisions solely by automated means that produce legal or similarly significant effects without appropriate safeguards. If this changes, we will inform you and explain your rights.

10. How to Exercise Your Rights

Email compliance@riverprime.eu with your request. We may need to verify your identity. We respond within one month (extendable by up to two further months for complex requests). There is no fee unless requests are manifestly unfounded or excessive. You may also lodge a complaint with the Office of the Commissioner for Personal Data Protection (Cyprus). Details are available on the authority's website.

11. Website & Policies

For more details (e.g., cookies, marketing), see our Privacy Policy and Cookie Policy on www.riverprime.eu.