

Data Protection Policy

Agora Prime Metals Trading FZCO | Version 1.0

Agora Prime Metals Trading FZCO treats the personal information entrusted to us as something we hold on trust. We collect it lawfully, use it only for the purposes we have explained, protect it with appropriate technical and organisational controls, and keep it no longer than we need to. Our approach rests on three commitments: confidentiality, integrity and availability.

The framework we work to

Our practices are designed to comply with UAE Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data, alongside the wider legal and regulatory obligations that apply to our business. We have also adopted principles drawn from internationally recognised standards: data minimisation, purpose limitation, security by design and documented accountability.

Whose information we handle

This policy covers all personal data processed across our operations — relating to our employees and contractors, our customers and prospective customers, our vendors and partners and their representatives, and data generated through our own systems, whether held physically, on our servers or in the cloud. It applies equally to any external party processing personal data on our behalf.

How we handle personal information

- We process personal data only on a lawful basis — consent, performance of a contract, a legal or regulatory obligation, or a legitimate business interest.
- We collect only what is necessary for a clearly defined purpose, and we do not repurpose data without a fresh basis for doing so.
- We tell people what we collect, why, and who it may be shared with, through clear privacy notices at the point of collection.
- We keep data accurate and up to date, and correct it promptly when told it is wrong.

Keeping information secure

Personal data is classified by sensitivity and protected accordingly. We encrypt data at rest and in transit, restrict access on a need-to-know basis through role-based controls and multi-factor authentication, and protect our infrastructure with firewalls, intrusion detection and continuous monitoring, tested by internal and external audit. Data is retained only for defined periods set by legal, regulatory and business requirements, after which it is securely deleted or irreversibly anonymised.

Your rights

Individuals whose personal data we hold may ask us to confirm and give access to what we hold; correct information that is inaccurate or incomplete; delete it where no overriding legal obligation requires us to keep it; restrict or object to particular processing; receive it in a portable, machine-readable format; and withdraw consent where consent is the basis we rely on. We verify identity before acting on a request and aim to respond substantively within 30 days. Requests may be sent to our Data Protection Officer at compliance@agoraprimetrading.com.

Transfers, third parties and incidents

Where personal data is transferred internationally or to a service provider, we assess the risk beforehand, transfer only what is necessary, and put contractual and technical safeguards in place. Every processor acting for us is subject to due diligence, a written data processing agreement covering security and breach notification, and ongoing monitoring. If a breach occurs, our incident response team contains it, investigates cause and scope, remediates the weakness, and notifies affected individuals and the authorities where required.

Governance and review

Accountability rests with the Board of Directors and senior management. A designated Data Protection Officer oversees day-to-day compliance, supported by a cross-functional Data Protection Committee and by department heads within their own areas. All staff complete data protection training on joining and at regular intervals thereafter. This policy is reviewed at least annually and whenever the law, technology or our operations change materially.

Questions about this policy, or about how we handle personal information, may be directed to compliance@agoraprimetrading.com.