Privacy Policy

Effective Date: July 20, 2026

1. Introduction

This Privacy Policy explains how **ASAP Solutions FZ-LLC**, trading as **Sure Leverage Funding** (”**Sure Leverage Funding**,” “**Company**,” “**we**,” “**our**,” or “**us**”), collects, uses, stores, shares, and protects your personal information when you access our website, create an account, purchase an Evaluation Program, participate in our Services, or otherwise interact with us.

The website and Evaluation Programs are owned and operated by **ASAP Solutions FZ-LLC**, a company incorporated in the Ras Al Khaimah Economic Zone, United Arab Emirates.

The simulated trading environment and related simulated trading platform services are provided by our affiliated company, **Sure Leverage Funding Ltd**, incorporated in Saint Lucia.

By using our Services, you acknowledge that you have read and understood this Privacy Policy and consent to the collection, use, disclosure, and processing of your information as described below.

---

2. Information We Collect

We may collect the following categories of personal information:

Identity Information

- Full name
- Date of birth
- Nationality
- Government-issued identification documents
- Selfie or identity verification images
- Signature where required

Contact Information

- Email address
- Telephone number

- Residential or mailing address

Account Information

- Username
- Password (stored in encrypted form)
- Customer identification number
- Account preferences

Payment Information

When you purchase our Services we may collect:

- Billing address
- Payment confirmations
- Transaction IDs
- Partial payment card information

Payment card information is generally processed directly by our third-party payment providers. We do not generally store complete payment card numbers.

Compliance Information

Where required we may collect:

- Passport
- Driver’s license
- National identity card
- Proof of address
- Tax documentation
- Identity verification results
- Anti-money laundering verification information
- Sanctions screening information

Technical Information

We automatically collect certain technical information including:

- IP address
- Browser type
- Operating system
- Device identifiers
- Login history
- Session information
- Cookies

- Location derived from IP address
- Website activity

Trading Information

When you participate in an Evaluation Program we collect information including:

- Trading activity
- Orders
- Positions
- Profit and loss
- Risk metrics
- Rule violations
- Evaluation progress
- Payout eligibility
- Account performance

---

3. How We Collect Information

We collect information:

- directly from you;
- when you register an account;
- when purchasing an Evaluation Program;
- during identity verification;
- through customer support;
- through cookies and analytics tools;
- through payment providers;
- through fraud prevention partners;
- from publicly available sources where legally permitted.

Failure to provide requested information may prevent us from providing some or all of our Services.

---

4. How We Use Your Information

We use your information to:

- create and manage your account;
- provide Evaluation Programs;
- provide simulated trading accounts;
- process payments;
- verify your identity;
- prevent fraud;
- detect prohibited trading;
- administer payouts;
- comply with anti-money laundering obligations;
- comply with sanctions laws;
- provide customer support;
- improve our Website and Services;
- communicate with you;
- conduct security monitoring;
- investigate abuse;
- resolve disputes;
- enforce our Terms & Conditions;
- comply with applicable laws.

We may also use anonymized or aggregated information for analytics, business intelligence, reporting, and product improvement.

---

5. Legal Basis for Processing

Where applicable, we process personal information because:

- it is necessary to perform our contract with you;
- it is necessary to comply with legal obligations;
- it is necessary for our legitimate business interests;
- you have provided consent where required by law.

---

6. Identity Verification & Compliance

To protect the integrity of our Services, we may verify your identity before granting access to certain Services or processing payouts.

Identity verification may include:

- document verification;
- facial verification;
- proof of address;
- payment verification;
- sanctions screening;
- fraud screening;
- anti-money laundering checks.

Failure to complete required verification may result in suspension, cancellation, or termination of your account.

---

7. Sharing Your Information

We may share your personal information where reasonably necessary with:

- ASAP Solutions FZ-LLC;
- Sure Leverage Funding Ltd;
- affiliated companies;
- payment processors;
- identity verification providers;
- fraud prevention providers;
- cloud hosting providers;
- customer support providers;
- IT service providers;
- legal advisers;
- accountants;
- auditors;
- insurers;
- banking partners;
- regulators;
- government agencies;
- law enforcement authorities;
- tax authorities.

We do not sell your personal information.

We only disclose personal information where reasonably necessary to provide the Services, comply with legal obligations, protect our rights, prevent fraud, or operate our business.

---

8. International Data Transfers

Because we operate internationally, your personal information may be transferred to and processed in countries outside your country of residence.

These countries may include the United Arab Emirates, Saint Lucia, the United States, member states of the European Union, and other jurisdictions in which our service providers operate.

Where appropriate we take reasonable contractual, technical, and organizational measures to protect your information during international transfers.

---

9. Cookies & Similar Technologies

Our Website uses cookies and similar technologies.

These technologies help us:

- remember your preferences;
- maintain login sessions;
- analyze Website traffic;
- improve performance;
- detect fraud;
- personalize content;
- measure advertising effectiveness.

You may disable cookies through your browser settings, although doing so may affect certain Website functionality.

---

10. Marketing Communications

We may send you:

- service announcements;
- security notifications;
- account updates;
- promotional offers;
- newsletters;
- marketing communications.

You may unsubscribe from marketing communications at any time by using the unsubscribe link included in our emails or by contacting us directly.

Even if you opt out of marketing, we may continue sending important account and service-related communications.

---

11. Data Security

We implement reasonable technical, organizational, and administrative safeguards designed to protect your personal information.

These safeguards may include:

- encrypted communications;
- access controls;
- employee confidentiality obligations;
- monitoring systems;
- secure infrastructure;
- authentication procedures.

No electronic transmission or storage system is completely secure, and we cannot guarantee absolute security.

---

12. Data Retention

We retain personal information only for as long as reasonably necessary to:

- provide our Services;
- administer accounts;
- process payouts;
- comply with legal obligations;
- satisfy tax and accounting requirements;
- investigate fraud;
- resolve disputes;
- enforce our agreements.

When information is no longer required, we will securely delete, anonymize, or otherwise dispose of it where reasonably practicable.

13. Your Rights

Subject to applicable law, you may request to:

- access your personal information;
- correct inaccurate information;
- update your information;
- delete certain personal information;
- restrict certain processing;
- object to certain processing;
- withdraw consent where processing relies upon consent.

Some requests may be limited where we are legally required to retain information or where doing so would impair fraud prevention, legal compliance, or the operation of our Services.

---

14. Children’s Privacy

Our Services are intended solely for individuals who are at least eighteen (18) years of age.

We do not knowingly collect personal information from children.

If we become aware that personal information has been collected from an individual under eighteen, we will take reasonable steps to delete that information.

---

15. Third-Party Websites

Our Website may contain links to third-party websites or services.

We are not responsible for the privacy practices or content of third-party websites.

Users should review the privacy policies of those websites before providing personal information.

---

16. Data Breaches

If we become aware of a personal data breach that is likely to result in a significant risk to individuals, we will take appropriate steps to investigate, contain, and respond to the incident and provide notifications where required by applicable law.

---

17. Changes to this Privacy Policy

We may amend this Privacy Policy from time to time.

Any updated version will become effective when published on our Website unless otherwise stated.

Your continued use of the Services following publication of an updated Privacy Policy constitutes acceptance of the revised version.

---

18. Contact Us

If you have questions regarding this Privacy Policy or wish to exercise your privacy rights, please contact us:

Sure Leverage Funding

Website Owner & Program Operator

ASAP Solutions FZ-LLC

Compass Building, CO-WORKING FOAM0528

Al Shohada Road 10055

Al Hamra Industrial Zone-FZ

Ras Al Khaimah

United Arab Emirates

Email: support@sureleveragefunding.com

You may also contact us through the contact form available on our Website.

We will respond to privacy requests and inquiries within a reasonable period and in accordance with applicable law.