

# **PRIVACY POLICY**

### 1. Introduction

Capital Nine Global Limited (hereinafter called "Capital Nine", "we", "Company" or "our") is registered as International Business Company in Saint Lucia with registration number 2023-004963 with registered office at The Sotheby Building, Rodney Village, Rodney Bay, Gros-Islet, Saint Lucia.

Capital Nine is dedicated to safeguarding the privacy of our customers and all individuals using our website (hereinafter called "you", "your" or "client"). This Privacy Policy (referred to as the "Policy") pertains to the Capital Nine Global website and is responsible for overseeing how we collect and use data. Protecting the privacy and safeguarding the personal and financial information of Company's clients and website visitors is one of our highest priorities and by using our website, you are indicating your agreement with the data practices outlined in this Policy.

## 2. Collection of personal information & Identity Verification

In adherence to applicable regulations and laws related to Anti-Money Laundering and Counter-Terrorism Financing, we are mandated to gather and validate client information. This data, commonly referred to as Know Your Client (KYC) information, encompasses various details, including identity, contact information, National Identifier, socio-demographic data, financial information, and documentary data, among others. We will diligently execute customer identification and verification procedures. The Client acknowledges and agrees that their consent is voluntarily provided to Capital Nine.

Our information collection serves the purpose of opening accounts and ensuring the security of your assets and privacy. To achieve this, we gather pertinent information to better understand your requirements and preferences. The data obtained directly from you comprises essential contact details such as your name, postal address, phone number, and email address, as well as your birth date and location. This same data will also be used by Capital Nine Global to establish communication with you regarding the services we offer.

For those registering a demo account, opening a live trading account, or entering and engaging into any other business relationship/arrangement with us, we kindly request the completion of the application form and provide necessary information. By furnishing the requested personal information within this form, you enable us to assess your application and adhere to the regulatory requirements governing financial services provision. The Company may collect various forms of personal information, including but not limited to:

- 1. Personal information that you furnish on applications and other forms, encompassing details like your name, last name, address, email address, phone number, date of birth, gender, occupation, and employment particulars.
- 2. Financial information, which may include details about your income, assets, and net worth.
- 3. Your IP address.
- 4. Information related to your financial accounts, such as bank accounts, e-wallets, and credit card particulars, along with tax-related information.
- 5. Documents provided by you for identity verification, which may comprise items like your passport or identity card, utility bills, bank statements, or, in the case of companies, incorporation details.

You are not obligated to disclose any of the personal information requested in the application form to Capital Nine. It is essential to note that the provision of such information is crucial for the opening of an account and the delivery of services by Capital Nine.

## 3. Use of Personal Data

We gather and utilize your personal information to facilitate the operation of our website and the provision of the services you've specifically requested. Additionally, in order to enhance our service quality to you, we may enlist the services of another business entity to aid us in executing specific internal functions, including but not limited to account processing, order fulfillment, client assistance, conducting client satisfaction surveys, and collecting data pertinent to our business operations.

In certain situations, Capital Nine may be required to employ your personal information in order to conform to applicable laws, court orders, judicial processes, or the stipulations of relevant regulatory bodies. Such instances include activities like anti-money laundering and due diligence assessments, fraud detection and prevention, call monitoring and recording, notification of service alterations, response to complaints and inquiries, and maintenance of updated records. These actions are carried out to fulfill our legal obligations and align with our legitimate interests.

It is important to note that Capital Nine does not engage in the sale, rental, or leasing of customer lists to third parties. Moreover, sensitive personal information, including aspects such

as race, religion, or political affiliations, is not used or disclosed without your explicit consent, unless compelled by law.

#### 5. Use of Cookies

Our website utilizes "cookies" to enhance your ability to personalize your online experience. These cookies consist of small data files, often containing a unique identification number or value, which is stored on your computer's hard drive as a result of your interaction with website. A primary objective of these cookies is to offer a convenience feature that saves you time. Essentially, cookies inform the web server that you've returned to a specific page. For instance, if you personalize pages on our website or register with our services, a cookie assists us in recalling your specific information during subsequent visits.

It's important to note that you have the option to either accept or decline cookies. While most web browsers automatically accept cookies, you can typically adjust your browser settings to decline them if you prefer. However, if you opt to decline cookies, it may impact your ability to fully utilize the interactive features of the Capital Nine services or the websites you visit.

# 6. Changes to this Policy

This Policy may undergo occasional revisions to incorporate feedback from both the company and our customers. We retain the right to modify or amend this Privacy Policy at our discretion, without prior notice. Any such revisions will be made known by posting these alterations on this webpage. We encourage you to periodically review this Policy to stay informed about the measures we are implementing to safeguard your information.