

# Privacy Policy



### Introduction

Number One Capital Markets, to be referred to as "N1CM" henceforth, is a registered company in Kumul Highway Rock Terrace Building, Port Vila, Vanuatu and is licensed and regulated by the Vanuatu Financial Services Commission.

Our top priority is maintaining your privacy. We pledge to safeguard and respect your personal information. This Privacy Statement explains the many categories of personal information we may collect about you when you decide to use our services, how we may use that information, when and with whom we may disclose it, and how we may keep it secure. Additionally, it outlines your rights in relation to how we handle your personal information and how you can exercise those rights. Please spend some time reading and comprehending this policy.

Unless otherwise noted, any mention of "us," "our," "we," or "N1CM" in this privacy notice refers to each group firm in the N1CM Group as the circumstances dictates.

Similar to that, unless otherwise specified, any mention of "you," "your," "yours," or "yourself" in this privacy notice refers to any of our current or potential clients.

We assume that you have read and understand the terms of this notice and how we treat any information you submit to us, including personal data before becoming a client, if you browse our websites or use any of the communication methods to contact us. When you open an account with us, you acknowledge that this notice, including any updates, will control how we gather, keep, use, disclose, and otherwise handle your personal data while conducting business with you and after it ends.



Number One Capital Markets Limited is authorised and regulated by Vanuatu Financial Services Commission (VFSC) with its registered Office at Suite T19, First Floor, Tana Russet Plaza, Kumul Highway, Port Vila, Efate, Vanuatu (company number: 15035).



## What kind of personal is collected by using our services?

#### **Personal Details**

Name, Surname, Date of Birth, Country of Residence, Tax Identification Number

#### **Employment details**

Profession, Workplace, Salary

#### E-wallets and online banking details

Information regarding your personal income and wealth; Details of your bank account, credit card and ewallet information, where applicable

#### **Contact Details**

Email address, phone number

#### **Tracking Details**

IP address, device information, location data

If you are creating a new account or adding a new signatory to an existing account, we are obligated by law to identify you. To comply with the criteria established by anti-money laundering regulations, we must

view and record information on specific papers (such as photographic and non-photographic documents). As needed by anti-money laundering laws or other laws pertinent to the services we provide to you, identification documentation comprises of (where applicable):



Number One Capital Markets Limited is authorised and regulated by Vanuatu Financial Services Commission (VFSC) with its registered Office at Suite T19, First Floor, Tana Russet Plaza, Kumul Highway, Port Vila, Efate, Vanuatu (company number: 15035).



- (a) National Identification Card
- (b) Passport
- (c) Driver's License
- (d) Bank Statement
- (e) Utility Bills

#### For Corporate Accounts:

- (a) Certificate of Incumbency
- (b) Registered Address of the Company
- (c) Passport of the Shareholder

Any discussions with you regarding the services we offer you and our relationship with you, whether they be oral, written, or electronic, may be recorded by us. These recordings will serve as our only source of ownership and serve as a record of our conversations. These phone calls may be recorded without using a warning tone or any other additional notification.

#### Your personal information may be disclosed to third parties under the following conditions

- (a) Contractors for administrative, IT, analytics, and online marketing optimization, financial, regulatory, compliance, insurance, research, and other services; service providers and specialized advisers.
- (b) Payment Service Providers (PSP) and banks
- (c) affiliates and introducing brokers with whom we have a common relationship
- (d) auditing, aiding with, or providing advice on any of our business goals by auditors, contractors, or other advisers
- (e) as agreed or authorized by law or our agreement with you, courts, tribunals, and relevant regulatory authorities
- (f) mandates by law, as well as in response to other legal and regulatory requests, government entities and law enforcement authorities
- (g) person(s) authorized by you





## How Your Personal Information is Stored

We take precautions to protect the personal information we keep from misuse, loss, unauthorized access, modification, and disclosure. We store personal information in a combination of secure computer storage facilities, paper-based files, and other records.

If we decide that personal information about you is no longer necessary, we will either erase any information that could be used to identify you or safely destroy the data.

Nevertheless, we might need to keep records for a long time. We must keep copies and evidence of our actions regarding your identity verification, sources of income and wealth, monitoring of your transactions, telephone, chat, and email communications, orders and trades history, handling of your complaints, and records that can show that we acted in accordance with regulatory code of conduct across the business, for example, because we are subject to investment services and anti-money laundering laws. After our business connection with you has ended, these documents must be kept for five years, or even longer if requested by our regulators. We will make every effort within our power to protect your data and to treat it securely in compliance with this Privacy Policy.





## Your Data Rights

You maintain your data subject rights under the following circumstances:

- (a) to gain access and receive information regarding your personal data
- (b) to request the correction or deletion of your personal data that we hold
- (c) to object the processing of the personal information provided by you
- (d) to request for the deletion of the personal data provided; be aware that the such a procedure may not always be realized right away or at all in line with legal reasons which will be made clear to you

You have the right to withhold any personal information when registering on our website and platform. Note that we handle your information in order to grant you access, we might not be able to give you access to all or a portion of the Website Services and/or Platform if you choose to not provide us with your personal information. You have the right to withdraw your consent to any submitted personal information at any time.

To ensure that you are aware of the data we gather, how we use it, and under what circumstances, if any, we release it, we will post any modifications to our privacy policy here and in any other locations we consider appropriate.

We will never request security information such as passwords over the phone, via text or email. Contact us at info@n1cm.com if you receive a call or email that you are unsure originated from N1CM.

