

PENTAGON CAPITAL MARKETS LTD

PRIVACY

CLIENT INFORMATION - PRIVACY POLICY



Pentagon Capital Markets LTD is an Accredited
Financial Services Provider in the Republic of Kazakhstan

PRIVACY POLICY

This privacy statement covers the website www.pentagonmarkets.com and all related sub-domains that are registered and operated by the Pentagon Capital Markets Ltd.

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1. Introduction

Pentagon Capital Markets (hereinafter referred to as the “Company”), is incorporated under the laws of Kazakhstan with Business Identification Number 210940023430 having its registered office 174 Kasim Amanzholov Street, Uralsk, West Kazakhstan Region, Kazakhstan, 090000. The Company is authorized as a Limited Company under the Department of registration of title to immovable property and legal entities of Non-commercial Joint-Stock company “Government for Citizens” State corporation in West Kazakhstan region (herein the “Law”).

The objects of the Company are all subject matters not forbidden as a Limited Company, registered by The accreditation Bureau of National Statistics of the Agency for Strategic Planning and Reforms of the Republic of Kazakhstan. Pentagon Capital Markets Ltd is a leading brokerage, by volume in FX. Meta Trader 4 also known as MT4, an electronic trading platform is used by Pentagon Capital Markets Ltd. It provides low latency and order processing.

The Company in accordance with the provisions of the Law and international standards, outlines in the Privacy Policy (herein the “Policy”) how the Company collects, maintains, utilizes, and discloses personal information of the Client.

This Policy applies to all Companies within the Liquidity Group and all the Companies follow the principles as outline hereof.

We train our employees who handle personal information to respect the confidentiality of customer information and the privacy of individuals. We regard breaches of your privacy very seriously and will impose appropriate penalties, including dismissal, should we deem it necessary.

This Policy applies to existing and Prospective Clients as well as to any visitors of the Company’s website(s).

The Company is committed to protecting the privacy of all Clients’ personal data which it obtains during the Account Opening process including information obtained during a Client’s visit to the Company’s website(s).

2. Collection of Personal Information:

The Company will use the Client’s personal information in accordance with worldwide data protection practices. The Company will use, store, process and handle personal information of the Client, only in accordance with the Law, this Policy and the

Company's Terms of Business. In order to open an account with the Company, the Client must first complete the online application form found on the Company's website(s), accept and submit the online application form to the Company providing to the Company all the required documents. By completing the online application form the Client is requested to provide the Company with private information in order for the Company to evaluate the Client's application and comply with the applicable laws and pre-set internal procedures governing the provision of financial services. This information shall be used by the Company in order to contact the Client for information about the services offered by the Company.

Personal data collected includes but is not limited to:

- Personal details such as name, date of birth, address, telephone number and/or e-mail address;
- Financial details such as estimated annual income and net worth, trading experience and investment knowledge;
- Identity verification Documents such as passport and photograph ID, utility bills, and/or bank statements or company information/corporate documents in case of an entity.
- Website: when visiting our site we will automatically collect the following information:
 - technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, and operating system and platform.
 - information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number.
- Telephone Discussions: In each of your discussions with members of our staff we may collect the following information about your call, i.e.: date and time, personal details, any changes registered after the opening of your account and any other significant information which we believe will assist in the efficient operation and maintenance of your account with us.

The Client must inform the Company immediately if there are any changes regarding his personal identification information and/or any other information which is relevant to the Company for the provision of financial services to the Client by emailing the Company's Customer Service Team at support@pentagonmarkets.com.

3. Use of Personal Data:

The following list illustrates the reasons why the Company may need to use the Client's personal identification information:

- To verify the Client's identity;
- To ensure that the Client meets the suitability requirements to use the company's products and services;
- To manage the account the Client holds with the Company;
- To process the Client's transaction;
- To send to the Client any information about transactions/post-transactions services;
- To keep the Client updated with news on the Company's products, services and any other information relevant to the Client's business relationship with the Company;
- For website improvement purposes;
- For the analysis of statistical data which will help the Company in providing its Clients with better products and services in the future.
- For Statistical Data: The Company may, from time to time, combine a Client's personal identification information with information from other users of this website to create impersonalized statistical data. The Company may provide this statistical data to Third Parties solely for statistical purposes and to the extent allowed by the Terms and Conditions in an effort to improve the Company's marketing campaign.
- The Client, shall, in no circumstances be identifiable from this statistical data; the Client will remain anonymous.

4. Client Records:

Under the applicable laws and internal procedures, the Company is required to keep records containing Client personal data, trading information, account opening documents, communications and anything else which relate to the Client after the execution of each transaction and/or for at least 5 (five) years of the termination of the business relationship.

5. Recordings:

Telephone conversations between the Client and the Company may be recorded and recordings will be the sole property of the Company. The Client accepts such recordings

as conclusive evidence of the Orders/Instructions/Requests or conversations so recorded.

6. Payment Gateway Providers:

The Company uses payment gateway providers to enable its Clients to deposit and withdraw securely to and from a Client's account. Payment Gateway providers do not retain share, store or use the Client's personal information for any other purposes other than to allow the Client to deposit and/or withdraw from his account.

7. Privacy:

Any personal information that the Client provides to the Company will be treated as confidential and shared only within the Company and/or its associated persons and/or Pentagon Capital Markets Ltd. and/or its affiliates and/or introducing brokers and/or its business partners and/or any third party which provide statistical services to the Company for the improvement of its marketing campaign.

Such personal information will not be disclosed to any third party except if such disclosure is required under any regulatory or legal proceedings.

Website tracking systems may also collect data detailing the pages the Client has accessed, how he discovered the Company's website, the frequency of his visits and any other action related thereof. The information the Company obtains is used to improve the content of its website(s) and may be used by the Company for contacting the Client using appropriate means in order for the Company to provide the Client with any information that the Company believes may be useful to the Client.

The personal information that the Client provides in connection with registering as a user of the website(s) or for the Services is classified as Registration Information. The Company offers high protection of the Registration Information provided by the Client. The Client can access his Registration Information through a password selected by him which is encrypted and known only to the Client. The Client must be careful and protect his password from any third parties. Registration Information is safely stored on secure servers that only authorized personnel have access to via password. The Company encrypts all personal information as it is transferred to the Company and thus makes all necessary effort to prevent unauthorized parties from viewing any such information.

Personal information provided to the Company that is not Registration Information also resides on secure servers and is again accessible only to authorized personnel via password. This information is not accessible by the Client; therefore no password is provided to view or modify this information

8. Choice/Opt-out:

If the Client no longer wishes to receive any promotional communications, he may opt-out of receiving them by following the instructions included in each communication.

The Client will be notified when his personal information is collected by any third party that is not the Company's agent/service provider, and the Client can make an informed decision as to whether or not to share his information with that party.

9. Cookies:

A cookie is a small text file that is stored on a user's computer for record-keeping purposes. The Company uses cookies on its website(s). The Company does link the information that it stores in cookies to any personal information the Client submits while accessing the Company's website(s).

The Company uses both session ID cookies and persistent cookies. A session ID cookie does not expire when the Client closes his browser. A persistent cookie remains on the Client's hard drive for an extended period of time. The Client can remove persistent cookies by following directions provided in his Internet browser's "help" file.

The Company sets a persistent cookie for statistical purposes. Persistent cookies also enable the Company to track and target the location and the interests of its users and to enhance the experience of its services on the Company's website(s).

If the Client rejects cookies, he may still use the Company's website(s), but the Client will not be able to use our portal and submit his online application form.

Some of the Company's business partners use cookies on the Company's website(s).

The Company has no access to, or control over these cookies.

10. Processing of Personal Data:

- a) The Company reserves the right to process personal information obtained by the Client if:
- b) the Client consents to such an action;
- c) such an action is required by applicable laws and/or by any competent authority having power over the Company;
- d) if such an action is required for pursuing the legitimate interests of the Company and/or any other third party to which such information is supplied;
- e) if such processing is necessary to protect the rights of the Company;
- f) if processing of such information is necessary for the Company to comply with an obligation imposed by law or to enforce legislation;

- g) for the conduct of proceedings in any court or tribunal that have commenced or are reasonably contemplated;
- h) it is in the interests of national security;
- i) to prevent and/or mitigate a serious threat to public health and/or the life or health of another individual.

The Company will not be liable for misuse or loss of personal information resulting from cookies on the Company's website(s) that the Company does not have access to or control over.

The Company will not be liable for the unlawful or unauthorized use of the Client's personal information due to misuse and/or malicious use and/or negligence and/or misplacement of the Client's passwords either by him or any third party.

11. Confidentiality Obligations:

Client information which the Company holds is to be treated by the Company as confidential and will not be used for any purpose other than in connection with the provision, administration and improvement of the Services, for research and statistical purposes and for marketing purposes (if the Client's consent is obtained where he is a natural person) and as provided for under the paragraph below. Information already in the public domain, or already possessed by the Company without a duty of confidentiality will not be regarded as confidential.

The Client agrees that the Company has the right to disclose Client information (including recordings and documents of a confidential nature, card details, and personal details) in the following circumstances:

- a) where requested by any authority having control or jurisdiction over the Company or the Client or their associates or in whose territory the Company has Clients;
- b) to relevant authorities to investigate or prevent fraud, money laundering or other illegal activity;
- c) to execution venues or any third party as necessary to carry out Client Instructions or Orders and for purposes ancillary to the provision of the Services;
- d) to credit reference and fraud prevention agencies, third authentication service providers and other financial institutions for credit checking, fraud prevention, anti-money laundering purposes, identification or due diligence checks of the Client. To do so they may check the details the Client supplied against any particulars on any database (public or otherwise) to which they have access. They may also use Client details in the future to assist other companies for verification purposes. A record of the search will be retained by the Company;

- e) to the Company's professional advisors provided that in each case the relevant professional is informed about the confidential nature of such information and commit to the confidentiality obligations as well;
- f) to other service providers who create, maintain or process databases (whether electronic or not), offer record keeping services, email transmission services, messaging services or similar services which aim to assist the Company collect, storage, process and use Client information or get in touch with the Client or improve the provision of the Services under the Account Opening Agreement and any other relevant agreements which the Client has accepted through the Company's website(s);
- g) to data reporting service providers;
- h) to other service providers for statistical purposes in order to improve the Company's
 - i) marketing, in such a case the data will be provided in an aggregate form;
 - j) to market research call centres that provide telephone or email surveys with the purpose to improve the services of the Company;
 - k) where necessary in order for the Company to defend or exercise its legal rights
- l) at the Client's request or with the Client's consent;
- m) to an Affiliate of the Company.

12. Right of Access:

In compliance with the Law and our internal procedures, every user is granted a number of rights in relation to their Personal Information. These rights include accessing and/or amending Personal Data, putting a stop to the processing on this data and preventing undesirable marketing.

Subject to the Protection of Personal Information, the Client has the right to request from the Company to correct and/or delete any personal information of him which is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or obtained unlawfully or delete and/or destroy a record of personal information if the Company is no longer authorised to retain such information. It should be noted that the Company may charge a fee to cover the associated administrative costs.

The Client is not obliged to provide the Company with any personal data. In the absence of this information however, the Company may not be able to open an account for the Client and/or to provide the Client with any other services, information, or assistance.

13. Amendment:

The Company reserves the right to review and amend this Policy from time to time for any reason and notify the Client of any such amendments accordingly by posting an updated version of this Policy on the Company's website(s).

The Client is responsible for regularly reviewing the Policy and any amendments thereof. Subsequent use of the Company's website shall constitute Client's acceptance of any amendments in the Company's Policy.

14. Consent:

By accessing and using the Company's website(s), the Client consents to the terms and conditions governing the collection, maintenance, use and disclosure of personal data of this Policy and the relevant laws regarding the protection of personal information in and outside of the Republic.

15. Enquiries:

For any enquiries regarding this Policy please contact the Company by emailing to our Compliance Department. support@pentagonmarkets.com

