



LANDMARK CAPITAL MARKETS

LTD

PRIVACY POLICY

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1. Introduction

At Landmark Capital Markets Ltd (hereinafter referred to as “Landmark Capital Markets”, “the Company,” “we,” “us,” or “our”), we are committed to protecting and respecting your privacy. This Privacy Policy (“Policy”) explains how we collect, use, share, and safeguard your personal information when you:

- i. Visit our website, www.landmarkmarkets.com (the “Website”);
- ii. Use our services;
- iii. Apply for or engage with any investment products or offerings we provide.

This Policy applies to the processing of personal data from clients, prospective clients, and Website visitors. It also outlines our efforts to ensure your data is handled securely, transparently, and in compliance with all applicable privacy laws.

Please note that this Policy does not extend to any third-party websites or services linked to or accessible from our website.

2. DEFINITIONS

2.1. For the purposes of this Policy:

(a) Cookies: Small data files stored on your device’s hard drive or memory. These help us enhance your experience by showing which parts of our website and services are most frequently used and tracking visit counts. To learn more about cookies and how to manage or disable them, please refer to the provided link.

(b) Log files: Records of activity on the Website that collect information such as your IP address, browser type, Internet service provider, referring and exit pages, and the date and time of your visit.

(c) Personal data: Any information that can directly or indirectly identify an individual, either on its own or when combined with other data—such as your name, ID number, or location details.

(d) Processing: Any action taken with respect to personal data, including but not limited to collecting, recording, organizing, storing, modifying, retrieving, using, sharing, or deleting that data.

(e) Web beacons: Small electronic files embedded in emails or on the Website. These help us deliver cookies, monitor visits, and evaluate the effectiveness of our communications and marketing campaigns.

3. Personal Data Information We May Collect (or Receive) About You

3.1. To open an account with us, you must first fill out and submit the application form with the necessary information. By completing this application form, you agree to provide personal information in order for Us to evaluate your application and comply with applicable rules and regulations. We may also use the information you provide to notify you about Our services.

3.2. We may collect a range of personal and financial information from you, including but not limited to:

- a) Your full name, residential address, and contact details (such as email address and phone number);
- b) Personal identifiers such as date and place of birth, gender, citizenship, and nationality;
- c) Financial information including income, sources of funds, assets and liabilities, bank account details, trading and financial statements;
- d) Details about your trading account(s), including balances, activity, inquiries, and our responses;
- e) Information indicating whether you hold or have held a prominent public function (Politically Exposed Person – PEP status);
- f) Professional and employment details, such as your employer and job title;
- g) Authentication information, including your signature;
- h) Location data, such as your IP address;
- i) Information on your trading experience, knowledge, and performance;
- j) Identity verification data, which may include government-issued documents (e.g., passport, ID card, or driver's license), Tax Identification Numbers, and publicly available background information;
- k) Proof of residency documents, such as recent utility bills or bank statements;
- l) Additional financial data, including bank account and credit card information, tax details, loan agreements, credit facilities, and your investment goals or preferences.

3.3 Our Company may collect and process the personal data mentioned above for individuals who:

- a) Visit our website
- b) Use any of the services available on our website
- c) Are current, former, or potential clients



This includes, but is not limited to:

- a) Individuals associated with corporate clients, such as directors, company secretaries, or other authorized representatives
- b) Shareholders, nominees, and ultimate beneficial owners of corporate clients
- c) Legal representatives, agents, or any other persons authorized to act on behalf of our clients

Minors

Individuals under the age of eighteen (18) ("Minors") are not allowed to use the Company's services. We do not knowingly collect personal information from or about Minors. If you are under 18, please do not use our services or share any personal details with us.

If we become aware that a Minor has submitted information, we will delete it promptly. If you suspect that a Minor has shared such information, please reach out to us at info@landmarkmarkets.com.

4. How We Collect Your Personal Information

- 4.1. We gather this information through your interactions with our services, which may include visits to our websites, use of our mobile apps, completing account or demo sign-up forms, subscribing to newsletters, or engaging with our client support team during ongoing communication.
- 4.2. We may also receive information about you from third parties to fulfill our regulatory requirements, such as verifying your identity. These third parties may include identity verification services, credit reference agencies, or similar institutions. Additionally, if you connect with us via a third-party platform (e.g., LinkedIn, Facebook), you permit us to access specific information from your account, in accordance with that platform's terms and your privacy settings.
- 4.3. We maintain records of your trading activity, including:
 - i. The products you trade and their outcomes
 - ii. Historical data related to your trades and investment amounts
 - iii. Your preferences for particular types of financial products
- 4.4. Occasionally, we may request additional personal information voluntarily (such as through surveys or market research). If you choose not to provide this information, we may not be able to fulfill your request for certain services or products.
- 4.5. We record all forms of communication with you—including calls, emails, in-person meetings, or other formats—related to our services and business relationship. These recordings are the exclusive property of the Company and may be used as evidence of our interactions. Phone calls may be recorded without prior notification or an audible alert.



5. Personal Information Collected Automatically

5.1. When you access or use our Services, we automatically collect information about you, including:

- a) **Log Data:** We collect data related to how you use our services, such as your browser type, app version, access times, pages visited, IP address, network identifiers, and the website you came from before accessing our services.
- b) **Device Data:** We gather information about the device you use to access our services, including details like the hardware model, operating system and version, unique device ID, and your mobile network provider.
- c) **Website Activity:** We maintain records of your interactions on our website, including content you submit, account-related actions, and details of deposits, withdrawals, and transactions, such as amount, currency, time, and payment method used.
- d) **Location Data:** With your device's permission, we may collect precise geolocation information.
- e) **Cookies and Tracking Tools:** We may collect data through cookies already stored on your device and other tools like web beacons and log files. These technologies help us gather insights into your behavior and improve your experience. For more details, please refer to our Cookies Policy.

You can find out more about Our use of Cookies in our Cookies Policy.

6. How We May Use Your Personal Information

6.1. We ensure that your personal data is processed lawfully, fairly and in a transparent manner for the following purposes and on the following lawful bases:

i. Contract Performance

As part of our contractual relationship with clients, we process personal data to deliver our products and services, and to provide relevant information about them. We also process this data during our client onboarding and acceptance procedures.

To establish you as a client, we are legally required to verify your identity. This process may involve third-party credit or identity checks conducted on our behalf. The information collected is essential for managing your trading account efficiently and ensuring high-quality service.



Additionally, we are legally obligated to use your personal data to meet regulatory requirements, such as Know Your Customer (KYC) and Customer Due Diligence (CDD) obligations.

ii. **Compliance with legal obligations**

To fulfill our legal duties under applicable laws, we are required to process your personal data for several purposes. These include identity verification, anti-money laundering checks, retaining your data for specific timeframes, and sharing information with regulatory or supervisory authorities as necessary.

Please note that providing your personal data is essential for establishing a business relationship with us and for delivering the services you request. Both legal and contractual requirements obligate us to maintain accurate and up-to-date information about you.

If you choose not to provide the requested personal data, we will be unable to meet our legal obligations, and therefore, we may not be able to initiate or continue our business relationship with you.

iii. **Through Consent**

Processing your personal data is lawful when you have given us your explicit consent, for example, when you agree to receive marketing communications. You have the right to withdraw your consent at any time. However, withdrawing consent will not affect any data processing that was carried out before the withdrawal.

iv. **Safeguarding legitimate interests**

We may process your personal data to support our legitimate interests or those of a third party. For example, when using your information for business or operational purposes. This type of processing is only carried out when it is necessary, fair, and aligned with your best interests. Even then, we ensure that your rights and freedoms are not compromised.

7. How we share your personal information

7.1. We do not share any confidential client information with third parties unless:

- i. It is required by applicable laws, rules, or regulations;
- ii. There is a legal or public duty to disclose the information;
- iii. Disclosure is necessary for our legitimate business interests; or
- iv. You have requested or consented to the disclosure.

7.2. In such cases, we ensure the third party is clearly informed of the confidential nature of the information shared. Where necessary to fulfill the purposes outlined above, your personal data may be disclosed to specific parties, such as:

- i. Regulatory or supervisory authorities
- ii. Identity verification or credit reference agencies
- iii. Auditors, legal advisors, or consultants
- iv. Affiliates and service providers supporting our operations

We take appropriate measures to ensure your data remains secure and is used solely for the intended purpose.

7.3. We may share your personal information within the Company and with our current or future parent companies, affiliates, subsidiaries, and other entities under common ownership or control. This may include:

- i. **Our Associates and Trusted Partners** – such as third-party service providers and specialist advisors who support us with administrative, financial, legal, insurance, research, or other professional services.
- ii. **Business Introducers** – individuals or entities with whom we have a mutual commercial relationship.
- iii. **Operational Partners** – including payment service providers, banks, IT hosting providers, and credit reference agencies.
- iv. **Legal and Regulatory Bodies** – such as courts, tribunals, and public or regulatory authorities, where required or permitted by law.
- v. **Authorized Third Parties** – anyone you have explicitly authorized us to share your information with,

7.4. If we share your personal information with business partners, such as banks or payment processors, to fulfill services you've requested, those partners may retain your data to meet their own legal or regulatory obligations. Additionally, third-party service providers, such as credit reference agencies (where applicable), may record any searches performed on our behalf and use that data to assist other businesses with similar checks.

7.5. Please note that this Privacy Policy does not apply to external third parties who act as independent data controllers of your personal information. Their own privacy policies will govern how they handle your data.

7.6. That said, we generally require all third parties who access or process your personal information to treat it as confidential, respect your privacy rights, and comply with applicable data protection laws and the principles outlined in this Privacy Policy.

8. Storage And Retention of Personal Information

We are committed to protecting your privacy, no matter how you engage with us, whether in person, over the phone, by mail, online, or through any other electronic channel.



We retain your personal data only for as long as necessary to fulfill the original purpose for which it was collected, or for other legitimate business reasons, including compliance with legal and regulatory obligations. Records are stored securely in a combination of electronic systems and paper-based formats, with strict safeguards in place to prevent misuse, loss, unauthorized access, alteration, or disclosure.

Once we determine that your personal information is no longer needed, we will either securely delete it or remove any identifying details. However, in some cases, we may be legally required to retain certain records for longer periods—for instance, under anti-money laundering laws, we must retain specific information for at least five (5) years after the end of our business relationship, or longer if mandated by law.

9. Security

Personal information you provide when registering on our website or using our services is classified as **registered information** and is protected through multiple security measures.

Once logged in, you must enter your username and password to access your account. It is your responsibility to keep your password confidential and not share it with anyone.

Registered information is stored securely and is only accessible to authorized personnel using secure login credentials. All personal data is transmitted to the Company over encrypted connections, with measures in place to prevent unauthorized access or interception.

Any personal information you provide that is not part of your registered account is also stored securely and accessible only by authorized staff through password-protected systems.

While no method of internet transmission is entirely secure, we implement strict security protocols to protect your data and prevent unauthorized access. However, the Company cannot be held responsible for any unlawful or unauthorized use of your personal information resulting from password misuse, loss, or negligent or malicious actions.

10. Marketing & Personal Data

With your consent (for example, if you've subscribed to our newsletter), we may send you marketing communications via email, phone, or other agreed channels, including social media to keep you informed about our latest products and services.

You can opt out of receiving these communications at any time by clicking the "unsubscribe" link found at the bottom of our emails or by contacting us at info@landmarkmarkets.com.

Opting out will withdraw your consent for future communications, but it will not affect the legality of any marketing sent before your withdrawal

11. Cookies

Cookies are widely used across websites to enhance user experience, and you can manage whether cookies are accepted by adjusting your browser settings. However, disabling cookies may limit access to certain features of our websites, including secure areas like the trading platform.

At times, we may partner with third-party providers, such as Google, to show you ads across the internet based on your past interactions with our site. You can opt out of this type of cookie-based advertising by visiting **Google's Ads Settings** page.

For more details on how we use cookies, please refer to our **Cookie Policy**.

12. Your Rights

12.1. We are committed to helping you exercise your rights regarding your personal data. Here's how you can do so:

- a) **Right to Access:** You may request confirmation of whether we are processing your personal data. If we are, we will provide a copy of your information within 30 days of your request.
- b) **Right to Rectification:** If your personal information is incorrect or incomplete, you can request an update. If we've shared your data with others, we'll inform them of the correction where possible. Upon your request, and when legally allowed, we'll also tell you who received your data. To update your details, email us at **landmark@landmarkmarkets.com**. In some cases, supporting documents may be required for verification.
- c) **Right to Erasure (Right to Be Forgotten):** You may request deletion of your personal data if it's no longer necessary for its original purpose, or if you've withdrawn consent (where applicable), and we are not legally required to retain it. If we've shared your data, we'll notify those parties where possible. Upon request, we'll also provide the list of recipients when lawful to do so.
- d) **Restrictions of Processing:** You can ask us to limit the processing of your data under certain circumstances, such as if you contest its accuracy or object to its use. We may continue to store your data but will pause further processing. We'll notify you before lifting any restrictions and, if possible, let you know who else received your data.
- e) **Right to data Portability:** You have the right to receive a copy of the personal data you provided to us in a structured, commonly used, machine-readable format. You may also request that we transfer this data directly to another service provider or data controller, where applicable.
- f) **Right to Object/opt-out:** You may object to the processing of your data where we rely on our or a third party's legitimate interest. We will stop processing your data unless we can demonstrate compelling legal reasons to continue. Withdrawal of consent does not



affect any prior lawful processing. If you no longer want us to use your data, contact us at info@landmarkmarkets.com. Please note that this may limit our ability to provide you with certain services or products.

13. Links to Other Websites

Our website may include links to external websites for your convenience or additional information. However, once you leave our site by clicking these links, please note that we do not have control over the content, privacy practices, or security of those external sites.

As such, we cannot be held responsible for the protection of any personal information you provide while visiting those websites, and they are not governed by this Privacy Policy. We strongly recommend reviewing the privacy policies of any third-party websites you visit to understand how your data may be collected and used.

14. Contact Us

If you have any questions about this Privacy Policy, how we handle your personal information, or if you wish to exercise any of your legal rights mentioned above, please feel free to contact us at landmark@landmarkmarkets.com. We're here to assist you.

15. Modification

We may update this Privacy Policy from time to time to ensure it remains aligned with current legal requirements and reflects any changes in our privacy practices. If any significant changes are made, we will notify you where legally required. The most recent version of this policy will always be accessible on our website for your reference.

16. Legal Disclaimer

We reserve the right to disclose your personal information when required by law or when we believe it is necessary to protect our legal rights or comply with judicial proceedings, court orders, or other legal processes involving our website.

We are not responsible for any misuse or loss of personal data caused by cookies managed by third parties, over which we have no control or access. Additionally, we are not liable for any unauthorized or unlawful use of your personal information resulting from the loss, misuse, or negligent or malicious handling of your passwords, regardless of how we were contacted.