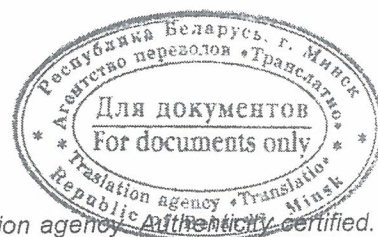




Approved by
Ireverate Capital Markets LLC Director
O.V. Volkov
, 2021

PRIVACY POLICY

Minsk, 2021



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The document was translated from Russian into English by "Translatio" translation agency. Authenticity certified. Address: 220004, Minsk, 23/3 Pobediteley av., office 501. Tel./fax: +375 17 226-99-89, tel. +375 29 3255 699. E-mail: translatio.minsk@gmail.com. Web-site: www.tfa.by

1. General provisions

1.1. This Privacy Policy is applied by Leverate Capital Markets LLC (hereinafter – the “Company”) to personal information received from the Clients during registration at the Company’s official website (www.fxpn.by), as well as during any use of the Company’s services.

1.2. This Privacy Policy is publicly available at the Company’s website. All the Clients shall familiarize themselves with the Privacy Policy and follow all of its amendments.

1.3. During registration at the Company’s website, the Client shall read and accept all the provisions of this Privacy Policy and agree to the use of his/her personal data in conformity with the Law of the Republic of Belarus *On Information, Informatization and Information Protection* No. 455-3 of 10.11.2008.

2. Client’s data

2.1. The Company warrants that the Client’s personal data are under permanent protection.

2.2. The Company permanently implements state-of-the-art security procedures and facilities to provide safe and protected environment.

2.3. For the purposes of service quality improvement, acceleration of processing of the Client’s requests, provision of information on the products and services of the Company, as well as compliance with anti-money laundering and anti-terrorist financing laws, and laws on non-proliferation of weapons of mass destruction, the Company may request from the Client all the necessary documents required by law of the Republic of Belarus and bylaws of the Company.

2.4. The Client shall provide valid data during registration at the Company’s website or provide data to the Company in any other way (in compliance with Terms and Conditions of Transactions with Non-Deliverable Over-the-Counter Financial Instruments).

2.5. The Client confirms that the documents provided during verification procedure or during private information update process are authentic and belong to the Client.

2.6. The Client hereby agrees that his/her private data will be kept in the database of the Company.

2.7. Private information is provided in the registration form at the Company's web-side and during submission of the necessary documents.

2.8. Private data may include without limitation the following items:

- surname, name, patronymic, date and place of birth, nationality, registration address and/or current address, identification data (passport or any other identity card), occupation, contact data and etc.;

- documents required for verification process (passport copy or copy of any other identity card, document confirming registration address and (or) current address, the Client's graphics image with the document opened at pages with the Client's private data);

- confirmation that payment instrument belongs to the Client (copy of bank payment card).

3. Information safety control

3.1. The Company guarantees the confidentiality of its Clients and their private information and takes all possible measures to keep such confidentiality, including observation of standards of security during transmission of the confidential information and usage of present-day storage technologies. The entire Client's information is kept with protected servers.

3.2 The Company has internal rules of access provision to Client's private data. Access is provided only to a limited group of employees.

3.3. The Client is fully responsible for confidentiality of passwords, user names and any other information concerning access to the Personal Account and the Platform.

3.4. The Client is fully responsible for the actions and operations performed with the use of the registration data.

3.5. In the case of undesirable disclosure of information about personal login or password, the Client may change the password independently at Company's website. If the Client discloses his/her login or password to the third parties, the Company is not responsible for information security and safety.

3.6. The Company may not request full bank details of the Client's payment card with the purpose to prevent any possibility of improper data use.

4. Use of personal data

4.1. The Client grants the Company a right to process his/her private information in the compliance with bylaws of the Company. The Client agrees with facts that the Company may collect, process, store, and use information, including its provision to the third parties (in compliance with the cl. 4.2.), and ask for additional information.

4.2. The provision of the confidential information to the third parties by the Company may be carried out only for the purpose of service provision, with the guarantees of information protection, or as required by applicable law of the Republic of Belarus when such information is requested by administrative or law enforcement authorities, courts or other competent authorities.

5. Refusal from personal data provision

5.1. The Client has the right not to provide private information to the Company.

5.2. The Client is aware that such refusal to provide the Company with the necessary personal data may limit the range of the Company's services or reduce quality of such services for whatever reasons take down the level of their quality.

5.3. If the Client refuses provide full information and documents (copies thereof), the Company may refuse to open the account and (or) perform the Agreement on Transactions with Non-Deliverable Over-the-Counter Financial Instruments.

6. Amendments to the Privacy Policy

6.1. The Company reserves the right to make amendments and (or) additions to this Privacy Policy.

Leverate Capital Markets LLC, registration number 193295922, included into the Register of Forex Companies kept by the National Bank of the Republic of Belarus on 11.03.2020, certificate No. 21, legal address: 69a-2 Minskaya str., office 34, Kolodischi, Kolodischi R/C, 223050, Minsk Region, Republic of Belarus