



**PRIVACY
POLICY**

1. PURPOSE

The purpose of this Anti-Money Laundering (AML) and Know Your Customer (KYC) policy is to outline FXLIVE CAPITAL LIMITED's commitment to preventing money laundering, terrorist financing, fraud, and other financial crimes in compliance with applicable legal and regulatory requirements.

This policy is further designed to ensure that all users of our platform are properly identified, transactions are monitored for suspicious activities, and the integrity of our services is upheld. By implementing robust AML and KYC procedures, we aim to foster a secure and transparent environment for all users and stakeholders.

2. INTRODUCTION

At FXLIVE CAPITAL LIMITED, we are dedicated to adhering strictly to international trade standards, complying with all relevant legislation to combat money laundering and counter-terrorism financing. Our Compliance Department monitors compliance with these requirements, ensuring all processes meet FATF recommendations and internal AML/KYC standards. This policy is mandatory for all employees, officers, directors, and third-party agents of the company involved in financial transactions, customer onboarding, and account management.

The Compliance Department ensures:

- **Document Verification:** All client documentation is accurate, current, and in line with applicable legal standards.
- **Standardization with International AML Protocols:** All company operations consistently meet international anti-money laundering standards.
- **Mandatory Compliance for Staff and Clients:** All employees, customers and third-party agents must adhere to these AML/KYC standards.

3. KNOW YOUR CUSTOMER RULES FOR CLIENTS

3.1 Adherence KYC Policy

At FXLIVE CAPITAL LIMITED, we prioritize the security and integrity of our platform and comply with legal requirements for Know Your Customer (KYC) verification. All clients must adhere to the following rules when using our services and throughout your relationship with us.

All customers must provide the following documents for identity verification:

- **Individuals:**
 - Government-issued ID
 - Proof of address
 - Selfie
- **Businesses:**
 - Certificate of incorporation/registration
 - Directors' identification and proof of address
 - Ownership structure and ultimate beneficial owner (UBO) details

At the company's discretion, you may be required to provide additional documentation and complete a KYC questionnaire as part of ongoing compliance. You agree to provide requested information promptly.

3.2 Submission of Documents; Process and Levels

Clients must submit the required documents during registration or upon request before accessing full services on the platform. Failure to provide the necessary information may result in restrictions or denial of access to services.

Clients are obligated to provide accurate, complete, and up-to-date information during the onboarding process and throughout their relationship with FXLIVE CAPITAL LIMITED. Clients must also promptly update the company on any changes to their information to ensure accuracy.

FXLIVE CAPITAL LIMITED implements a multi-tiered client verification process to ensure robust compliance with AML and KYC requirements. Clients must complete the following verification levels to access various services:

3.2.1. Default Level: Registered

- **Description:** This is the initial level where clients provide basic registration information to create an account.

3.2.2. Level 1: Verified

Required Documents:

- **Proof of Identity:** Passport, Driving License, Permanent Residence, and a Selfie.
- **Proof of Address:** Utility Bill, Bank Statement, or Registration Document issued by a government authority (dated within the last three months).

Access: Basic trading features and withdrawals.

3.2.3. Level 2: Verified+

Required Documents:

Proof of Funds: Bank statements, income proof, or other relevant documents confirming the lawful origin of funds.

Access: Extended features, higher transaction limits, and additional account benefits.

3.3 Risk Assessment

FXLIVE CAPITAL customers are categorized into risk levels (low, medium, high) based on factors such as:

- Nature of the business
- Country/Geographic Risk
- Transaction patterns

3.3.1. NATURE OF THE BUSINESS

Nature of the business risk, also referred to as the Service Risk, pertains to the potential for financial crimes such as money laundering, fraud, or terrorist financing based on the type of services provided by FXLIVE CAPITAL LIMITED or the business activities of its clients. Certain services or industries may inherently pose higher risks due to their complexity, transaction volume, or susceptibility to misuse.

FXLIVE CAPITAL LIMITED's approach to assessing and mitigating risks associated with the nature of its services and its clients' business operations are below;

1. Identification of High-Risk Services or Businesses

FXLIVE CAPITAL LIMITED identifies high-risk activities and industries based on factors such as:

- High transaction volumes or large cash-based operations.
- Industries prone to regulatory scrutiny, such as gambling, real estate, cryptocurrency, or financial intermediaries.
- Businesses involving cross-border transactions, especially with high-risk jurisdictions.
- Companies operating in sectors associated with corruption or tax evasion risks.

2. Enhanced Due Diligence (EDD) for High-Risk Services or Businesses

Clients engaged in high-risk activities are subject to Enhanced Due Diligence measures, including:

- Providing detailed information about their business operations, including the source of funds and the nature of transactions.
- Submission of additional supporting documents, such as licenses, permits, and audited financial statements.
- Regular account monitoring to detect unusual transaction patterns.

3. Risk Assessment for Services Provided

FXLIVE CAPITAL LIMITED evaluates the risks associated with its own services to ensure that its offerings are not misused for illegal purposes. This includes:

- Implementing transaction limits and monitoring tools for high-risk services like digital wallets or cross-border transfers.
- Reviewing the onboarding process for clients seeking access to such services.

4. Ongoing Monitoring and Reviews

Clients classified under high-risk categories due to their business nature are subject to continuous monitoring. This includes periodic reviews of their accounts, transactions, and risk levels.

5. Mitigation Measures

Based on the risk assessment, FXLIVE CAPITAL LIMITED may take the following actions:

- Limit the scope of services provided to certain industries or businesses.
- Impose stricter KYC requirements for specific sectors.
- Deny services to businesses that present unacceptable risks, such as those involved in illegal or unethical practices.

3.3.2. COUNTRY/GEOGRAPHIC RISK

Country/Geographic risk refers to the potential for financial crimes, such as money laundering or terrorist financing, based on the geographic location or jurisdiction where a client operates or resides. Certain countries or regions may pose higher risks due to weak regulatory frameworks, prevalence of corruption, political instability, or association with sanctioned entities or activities.

FXLIVE CAPITAL LIMITED's approach to identifying and mitigating risks associated with clients or transactions involving high-risk jurisdictions.

1. Identification of High-Risk Countries

FXLIVE CAPITAL LIMITED uses publicly available resources and regulatory guidelines to identify high-risk jurisdictions, including but not limited to:

- Countries listed by the Financial Action Task Force (FATF) as high-risk or under increased monitoring ("grey list" or "black list").
- Countries subject to international sanctions or embargoes.
- Countries identified as tax havens or lacking transparency in financial systems.

2. Enhanced Due Diligence (EDD) for High-Risk Countries

Clients residing in or transacting with high-risk countries are subject to Enhanced Due Diligence measures, including:

- Providing additional documentation to verify identity and source of funds.
- Detailed scrutiny of transactions to ensure legitimacy and compliance.
- Ongoing monitoring of account activities to detect unusual or suspicious behavior.

3. Restrictions on Certain Jurisdictions

FXLIVE CAPITAL LIMITED reserves the right to deny services or restrict transactions involving certain jurisdictions deemed too high-risk based on regulatory guidance or internal risk assessments. This may include:

- Prohibiting transactions with countries under international sanctions.
- Rejecting clients operating in jurisdictions with inadequate AML/CFT frameworks.

4. Monitoring and Updates

The list of high-risk jurisdictions is regularly reviewed and updated based on guidance from:

- FATF
- Local and international regulatory authorities

3.3.3. TRANSACTION PATTERNS

Transaction patterns refer to the behaviors and trends in how clients conduct financial transactions on FXLIVE CAPITAL LIMITED's platform. Monitoring these patterns helps identify potential risks of money laundering, fraud, or other illicit activities by detecting unusual or suspicious activities that deviate from a client's typical financial behavior.

1. Normal Transaction Patterns

FXLIVE CAPITAL LIMITED establishes a baseline understanding of each client's typical transaction behavior during the onboarding process. This includes:

- Average transaction size
- Frequency of transactions
- Types of transactions (e.g., payments, transfers, withdrawals)
- Geographical locations involved

This baseline is derived from the information provided during KYC verification and early transaction history.

2. Identifying Unusual or Suspicious Patterns

Transactions that deviate significantly from a client's usual patterns may be flagged for review. Examples include:

- Large or Sudden Transactions: Unusually large sums that are inconsistent with the client's profile.
- Frequent Transfers: High frequency of transactions within a short period, especially to unknown or high-risk jurisdictions.
- Geographic Anomalies: Transactions involving countries with high money laundering or terrorism financing risks.
- Structured Transactions: Multiple small transactions designed to avoid detection thresholds.

3. Monitoring and Alerts

FXLIVE CAPITAL LIMITED employs automated monitoring systems and manual reviews to track transaction patterns. These systems:

- Generate alerts for transactions that exceed pre-defined thresholds or exhibit suspicious characteristics.
- Utilize machine learning or rule-based algorithms to detect unusual activity.

4. Enhanced Due Diligence (EDD) for Suspicious Patterns

If a client's transactions are flagged as suspicious, FXLIVE CAPITAL LIMITED may initiate Enhanced Due Diligence procedures, such as:

- Requesting additional documentation to verify the legitimacy of the transactions.
- Temporarily suspending or restricting account activities until investigations are complete.
- Reporting the activity to the appropriate regulatory or law enforcement authorities, if required.

5. Reporting Requirements

In compliance with applicable laws, FXLIVE CAPITAL LIMITED is obligated to file Suspicious Transaction Reports (STRs) or Suspicious Activity Reports (SARs) for flagged transactions that cannot be justified after investigation.

3.4 CLIENT CATEGORIZATION

Client categorization based on the above risk assessment involves classifying customers based on their risk levels and business activities to ensure appropriate levels of due diligence and monitoring. FXLIVE CAPITAL LIMITED carry out the basically two Due Diligence processes which are;

Customer Due Diligence (CDD)

- Initial Verification: All new customers must undergo a KYC process before initiating any transaction.
- Ongoing Monitoring: Regular reviews of customer transactions and profiles to identify unusual or suspicious activity.

Enhanced Due Diligence (EDD)

High-risk customers may require additional verification, such as:

- Source of funds/income
- Continuous monitoring of transactions

FXLIVE CAPITAL LIMITED classifies clients into the following categories based on their risk profiles:

1. Low-Risk Clients

These clients typically include individuals or entities with transparent financial histories, limited transaction volumes, and operations in regulated industries. The period of reviewing and monitoring business relationship with low-risk customers is every 2 years. Examples include:

- Salaried individuals
- Established businesses with verifiable records
- Listed companies whose securities are admitted to trading on a Regulated Market in a country or in a third country which is subject to disclosure requirements consistent with community legislation.

2. Medium-Risk Clients

These clients exhibit moderate risks due to higher transaction volumes, slightly complex business structures, or limited transparency. The period of reviewing and monitoring business relationship with

low-risk customers is every 2 years. Examples include:

- Small-to-medium enterprises (SMEs)
- Freelancers and consultants with irregular income

3. High-Risk Clients

Clients in this category pose elevated risks due to factors such as:

- Involvement in high-risk industries (e.g., gambling, cryptocurrency, or remittances)
- Operating in or transacting with high-risk jurisdictions
- Complex ownership structures or high transaction volumes

The period of reviewing and monitoring business relationship with high-risk customers is every year.

4 ANTI-MONEY LAUNDERING (AML) MEASURES

4.1 Transaction Monitoring

Transaction monitoring is the ongoing process of reviewing, analyzing, and tracking financial transactions conducted on FXLIVE CAPITAL LIMITED's platform to detect and prevent money laundering, terrorist financing, and other illicit activities. This clause ensures that all transactions are scrutinized for compliance with Anti-Money Laundering (AML) laws and regulations, safeguarding the veracity of our platform.

FXLIVE CAPITAL LIMITED employs automated systems and manual processes to monitor transactions in real-time. These systems are designed to:

- Identify unusual patterns or anomalies.
- Flag high-value transactions exceeding set thresholds.
- Detect rapid movements of funds that may indicate structuring or layering activities.

FXLIVE CAPITAL LIMITED may contact client(s) to clarify transaction details or request supporting documents when activities are flagged. Failure to provide satisfactory responses may result in account restrictions or reporting to authorities.

4.2. Internal Review Process

Upon identifying a suspicious activity, the following internal review process is carried out:

- **Initial Assessment:** The compliance team conducts a preliminary investigation into the flagged activity, analyzing the transaction details, client profile, and any available supporting documents.
- **Enhanced Due Diligence (EDD):** If necessary, further investigation is conducted, which may involve contacting the client for additional documentation or clarification.
- **Escalation:** If the suspicious activity remains unresolved or further investigation confirms it may involve illicit activities, the case is escalated to senior management or compliance officers for final assessment.

4.3 Reporting Suspicious Activities

This section outlines FXLIVE CAPITAL LIMITED's commitment to detecting, investigating, and reporting any suspicious financial activities that may involve money laundering, terrorist financing, or other illegal actions. This process ensures that we comply with Anti-Money Laundering (AML) regulations and contribute to the global fight against financial crimes.

If a transaction is deemed suspicious after investigation, FXLIVE CAPITAL LIMITED will file a Suspicious Transaction Report (STR) or Suspicious Activity Report (SAR) with the relevant authorities. The report includes:

- Client Information: Details about the client involved in the suspicious activity.
- Transaction Details: A description of the suspicious transaction(s), including amounts, dates, and any other relevant information.
- Reason for Suspicion: A summary of why the activity is considered suspicious and the steps taken during the internal review process.

4.4. Information Sharing

FXLIVE CAPITAL LIMITED is committed to protecting the privacy of its clients, but FXLIVE CAPITAL LIMITED shall share information related to AML and CFT matters in accordance with applicable laws, regulations, and international agreements. Also, FXLIVE CAPITAL LIMITED reserves the right to share your information with financial institutions and law enforcement agencies as required by law, without prior notice or consent.

Information will only be shared in accordance with the following principles:

- Confidentiality: Information shared will be treated as confidential and handled securely. Only the necessary details will be disclosed to authorized entities.
- Compliance with Data Protection Laws: FXLIVE CAPITAL LIMITED adheres to applicable data protection laws such as the General Data Protection Regulation - GDPR to ensure that any information shared is done so in a legally compliant manner.

In compliance with this policy, we retain records of your transactions for a minimum of five years.

5. CLIENT OBLIGATIONS TO PREVENT ILLICIT ACTIVITIES

The obligations of the clients of FXLIVE CAPITAL LIMITED in ensuring that their activities on our platform comply with Anti-Money Laundering (AML), Counter-Terrorism Financing (CFT), and other relevant laws and regulations.

1. Adherence to Legal Standards:

You agree to comply with all relevant laws, including international regulations, to prevent illicit activities, financial fraud, and money laundering. You are responsible for preventing your direct or indirect involvement in illegal financial activities or transactions through FXLIVECAPITAL's website and services.

2. Verification of Fund Origin:

You confirm the legal origin, ownership, and right to use all funds transferred to your FXLIVECAPITAL account. If there is evidence of suspicious activity, deposits from untrusted sources, or fraudulent behavior (e.g., refunds or payment cancellations), FXLIVECAPITAL reserves the right to conduct an investigation, block or close your account, cancel any transaction, and suspend account activities until the investigation concludes. Decisions will be guided by applicable laws, FATF recommendations, and industry best practices.

3. No Use of Third-Party Accounts

Clients are prohibited from using third-party accounts or providing false information about the ownership of funds. Transactions must be conducted through accounts in the client's own name. The use of false identities or third-party intermediaries for illicit purposes is strictly forbidden.

4. Restricted Jurisdictions

FXLIVE CAPITAL LIMITED does not serve clients in jurisdictions blacklisted by the FATF. Additionally, services are not available to U.S. citizens or residents.

6. SUSPICIOUS ACTIVITY MONITORING AND ACCOUNT RESTRICTIONS

1. Right to Refuse Suspicious Transactions

FXLIVE CAPITAL LIMITED reserves the right to refuse any transaction deemed suspicious. Preventative measures, such as account suspension, blocking or closure, may be employed, and FXLIVE CAPITAL LIMITED bears no civil liability for obligations resulting from such measures.

2. Client Cooperation and Continuous Monitoring

- Clients are required to cooperate with FXLIVE CAPITAL LIMITED's investigation of suspicious activities. This includes:
 - Providing Requested Information: Clients must promptly provide any requested documents or explanations related to suspicious activities.
 - Ongoing Monitoring: Clients who have been flagged may undergo enhanced monitoring, and periodic reviews will be conducted to ensure compliance with AML standards.

3. Confidentiality of Compliance Measures

FXLIVE CAPITAL LIMITED is not obligated to disclose to clients or third parties the specifics of actions taken to fulfill AML/CFT requirements, such as suspicions raised, reasons for transaction refusals, account closures, or document requests.

4. Disciplinary Action

In cases of serious misconduct, FXLIVE CAPITAL LIMITED may decide to pursue legal actions against the client or third party in order to address any criminal behavior, including civil or criminal penalties.

7. POLICY SCOPE AND COMPANY DISCRETION

1. Policy as a Framework

This policy serves as a summary to outline FXLIVECAPITAL's AML/KYC commitment to global AML/KYC standards and the key principles of our AML/KYC practices. Our internal AML/KYC procedures may further elaborate on these guidelines, and nothing in this summary should be construed as final or unchangeable.

2. Policy Integration with Client Agreement

This AML/KYC policy is a critical component of any agreement with FXLIVE CAPITAL LIMITED. Failure to comply with this policy may result in the immediate termination of the business relationship at the discretion of FXLIVE CAPITAL LIMITED.

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