



KYC POLICY



Luzuna

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1 Introduction

1.1. In compliance with the Anti-Money Laundering (“AML”) Policy, the Company has established the Know Your Customer (“KYC”) Policy in due diligence procedures for customer identification.

1.2. This Policy also intends to prevent grand larceny, identity theft, financial fraud, and terrorist financing, including identifying persons who are not permitted to access and use the Company’s services.

1.3. The Client’s specific information must be provided to the Company to verify his/her identity, nature of business, and his/her intended purpose of transactions. Therefore, the Company requires the Client to submit all documents as soon as possible to avoid transaction delays.

1.4. In certain conditions, the Company may require the documents to be provided before allowing the Client to perform further actions, including but not limited to depositing and trading.

2 Client Identity Verification

2.1. The following factors are considered in assessing the risks of violating the AML Policy:

- a. Whether the Client is an individual, an intermediary, a financial or non-financial institution, or a regulated person or entity
- b. If the Client is a politically exposed person
- c. If the Client is already a registered user
- d. How the Client became a customer of the Company
- e. If the Client’s business or account has a greater likelihood of being involved in illegal activities
- f. If the Client’s residence is from a jurisdiction with bank secrecy laws

2.2. The Company will obtain the necessary information to verify the Client’s identity. Additionally, the Client is responsible for ensuring that the information and other personal details he/she provides the Company are true, accurate, and complete.

2.3. For completing the procedure for identity verification, the Client should be able to provide, but not limited to, the following:

- a. Proof of identity can be a copy of a government-issued ID, a national or foreign passport (with two (2) pages shown), or a driver’s license (front and backside).
- b. Proof of residence should not be older than six (6) months, showing the name and complete address, which should be identical to the Client’s registered information with the Company. This document can be a bank statement, utility bill, certification of residence confirmation, or lease agreement issued by the government.

Trading currencies and CFDs on Margin involves substantial risk and might not be appropriate for every investor. It is possible to incur a loss equivalent to or exceeding the entire capital. Before using Luzuna’s services, please acknowledge all the potential risks of trading and assess whether the critical factors align with your ability to accept such risks. Such factors include your risk appetite, expertise, investing experience, and trading preference.



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- c. Copy of the card used to deposit where the front side should show the first six (6) and last four (4) digits and the expiration dates. The backside should also show the first six (6) and last four (4) digits, including the signature with the CVS covered.

2.4. The Client can scan or take a clear photo of the documents with legible text and all corners and sides visible. The Client should provide the relevant documents only in JPG, PNG, or PDF format without password protection.

2.5. Documents can be submitted to the Company's official email, or the Client may upload them on the Website.

2.6. The verification process may be conducted after the Client's initial deposit of 250 USD. To verify that the Client makes each transaction, the Company may send a Declaration of Deposit document to the Client's registered email every time he/she conducts a deposit transaction. The Client agrees that this document must be signed immediately upon receipt.

3 Collected Data

3.1. The Company holds the security of documentation with the highest priority and would treat all documents received with utmost respect and confidentiality. All records the Company acquires are protected with the highest level of possible encryption at every step of the verification process.

3.2. While all collected Client information and documents are confidential, the Company reserves the right to disclose such data to its business affiliates, including banks and other institutions. Moreover, disclosing such data is for business purposes only and will not be used for the Company's interest

3.3. The Company has the right to reject requests for obtaining the Clients' documents and information to protect the collected data's privacy.

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