



**BMFN Limited**

**Customer Data Privacy Policy**

By signing the agreement the Client is informed that BMFN Limited can process and keep personal data which the Client has provided and/or will provide and/or data BMFN Limited has access to pursuant to its communication with the Client. The right of BMFN Limited to process personal data is in accordance with applicable Law of Republic of Vanuatu and client's consent, and the Company may keep clients names, address and e-mail. Personal data will not be used for direct marketing.

The Client agrees that BMFN Limited may use independent reliable sources at its discretion in order to identify the Client.

The Client agrees that access to his/her personal data shall have only the employees, managers of the Company and the persons that the Company has executed agreements for legal and accounting services with. The Client agrees that the Company may disclose his/ her personal data only to credit, financial and other institutions, State and municipal bodies when this is necessary for the execution of the agreement with the Client or in order to meet the requirements for the measures against money laundering and terrorism financing, or according to rights of state authorities to conduct inspections and /or investigations.

**Notification letter to the clients of the investment intermediary BMFN Limited, Vanuatu regarding the processing of personal data of EU citizens**

This notification letter will be provided to the clients of the investment intermediary by virtue of Article 13, Paragraph 1 and 2 from Regulation 2016/679 and discloses information that concerns the processing of personal data.

1. BMFN Limited, N 40202 is an international company limited by shares, instituted according to Law of Republic of Vanuatu and possessing a License issued by Financial Services Commission of Vanuatu for dealing in securities. Company has LEI code: 549300BRLPPP217CJ792, and legal address: Law Partners House, Kumul Highway, Port Vila. Contact person for the firm is Mr. Kevin McGrath, compliance officer and DPO, e-mail for contact purposes: [operations\\_vt@bmfnc.com](mailto:operations_vt@bmfnc.com) to which one the Client may bring an appeal or a signal regarding the processing of personal data.
2. The purposes of processing personal data are related to the identification procedures aimed at the clients of the company and its counterparties, assessment of a certain service (suitability and appropriateness), as well as satisfaction of the regulatory requirements established in the Anti-Money Laundering Act and the Law against Terrorist Financing;



The company has the right and obligation to process the personal data of its clients for the purposes established in the above mentioned Law acts. In the quoted laws and regulations, obligations of the company which acts as a data administrator are established. Their preservation is obligatory for the purposes of carrying on an activity as a provider of investment and additional services, including by the means of processing and retention of personal data.

3. The recipient of personal data are the authorities established in the Law against money laundering under the circumstances quoted in the mentioned act. The processing of personal data is being carried out by the employees of the investment intermediary. It is permissible for legal advisors, lawyers, accountants, auditors, risk managers, vendors, technical specialists responsible for the maintenance of the computer systems of the company, as well as providers of informational services for the corresponding activities carried out by the persons involved in the already designated categories, to have access to the personal data.

With the client's consent the investment intermediary can disclose and provide the personal data to its partners or financial services providers. By receiving this notification letter the client gives his approval for providing of his personal data to third parties, partners of the investment intermediary for the purposes of the provided services for direct marketing and statistical processing of data.

By signing this notification letter the client is regarded explicitly as informed about the necessity and the legal requirement upon the investment intermediary to allocate/provide personal data of the client to brokers or liquidity providers from third countries for the purpose of providing some investment services and activities by such brokers or liquidity providers. Without this data allocation the contractual obligations related to the execution and/or the reception and transmission of orders for transactions in financial instruments cannot be fulfilled.

4. In its capacity as personal data administrator the investment intermediary does not have the intention to submit/transfer personal data to a third country or international organization unless the Client has given its consent. By receiving this notification letter the client gives his approval for providing the transferring of his personal data to third countries which have legal regime for protection of personal data.
5. The investment intermediary shall keep all the documents, data and information collected and prepared in line with the Anti- Money Laundering Act for a period of five years. In the case of establishing business relations with clients, as well as in the cases of entering in correspondent relations the period for personal data keeping starts from the beginning of the calendar year, the year after the event of the termination of the relationship.
6. The client has the right to require from the investment intermediary access to or correction of his personal data. However, deleting personal data or setting limitations to its processing is possible only after the expiry of the legal deadline for the record keeping. The client has the right to appeal against the processing of personal data, as well as against the data portability right, provided that this does not contradict to a statutory duty of the investment intermediary or other legal acts.



7. When the processing of personal data is based on provided consent, the client has the right to revoke his/her consent at any given time without prejudice to the legality of the processing based on consent before the revocation.
8. The client has the right to bring an appeal to supervisory authority regarding the processing of his/her personal data. The personal data subject, whose data is being collected and processed by the investment intermediary can bring such appeal to the Vanuatu Financial Supervision Commission for personal data protection stationed on the following address: Rue Bougainville, Port Vila, +678 22247.
9. The provision of personal data is a legal, mandatory requirement according to the AML Law and other applicable legal acts to activities of BMFN Limited. The personal data subjects, whose data is being collected and processed by the company are regarded as informed about this fact by the means of written paragraphs in the Agreement signed with clients and/or counterparties and about the fact that their refusal to provide the personal data, which is required according to Anti-Money Laundering Act is a legal basis for the company to refuse the provision of the respected service.  
  
Consequences from the refusal to provide personal data: In the cases in which the investment intermediary is unable to fulfill the requirements established in the Anti- Money Laundering Act due to the client's refusal to submit personal data, the intermediary is obliged to refuse the execution of the operation or the deal or entering in business relations, including opening an account.
10. The investment intermediary does not implement automated decision-making, including profiling and based on this it does not provide information about the use of logic, as well as the meaning and the projected impact of the processing on the subject of the data.
11. I received this notification letter, read it, understand its content and its consequences, and I accept it.