

## KYC & AML Policy

This policy applies to **Fortuna Markets** (referred to as 'Fortuna Markets, 'we', 'our', 'us') and extends to and covers all operations and functions of Fortuna Markets.

**KYC:** Know Your Client

**AML:** Anti Money Laundering

Due to obligatory 'Know Your Client' procedures, Fortuna Markets must follow in accordance with international 'Anti Money Laundering' regulations.

**1. Fortuna Markets** does not give individual the option of dealing with them anonymously, or under a pseudonym, as Fortuna Markets is required to identify all trading client under the Saint Lucia Anti-Money Laundering Act, Cap 12.20 and Anti-Terrorist Financing Act, Cap 3.16, as amended. In addition, it is impracticable for Fortuna Markets to deal with individuals who have no identified themselves or us a pseudonym.

**2. Where your personal information** is being collected under the GDPR, Fortuna Markets will also take reasonable steps to make you aware of:

- Whether we are required to collect your personal information under a contractual relationship or to comply with our legal or regulatory obligations, or if we are collecting your personal information based on you consent and your right to withdraw your consent at any time; your data subject right under the GDPR (please see action "Access to Personal Information" below);
- Your right to lodge a complaint with the relevant data protection supervisory authority; and
- If we intend to use automated decision making, including profiling to process your personal information, and a description of the automated decision-making process and consequences.

**3. Fortuna Markets** are required by the Saint Lucia Anti-Money Laundering Act, Cap 12.20 and Anti-Terrorist Financing Act, Cap 3.16, as amended to verify your identity before we can provide you with financial products and services. Electronic verification allows us to verify your identity by using electronic tools and external data sources.

**4. Electronic Verification Process;** In order to verify your identity electronically, we will ask you for your details (such as your name, address, date of birth) and details of your identification documents. This information will be passed on to external organizations in order to electronically match your information with information on their databases.

These organizations will assess and advise us whether all or some of the information you provided matches their records.

The external data sources used to verify your identity include:

- Credit information files held by Fortuna Markets (this is only to confirm your identity and is not a credit check)
- Publicly available information such as the electoral roll and white pages
- Information held by the official record holder via third party systems

It is an offence the Saint Lucia Anti-Money Laundering Act, Cap 12.20 and Anti-Terrorist Financing Act, Cap 3.16, as amended to provide false and misleading information about your identity.

**5. Your Agreement;** By agreeing to our terms and conditions you affirm that:

- The information you are providing is your personal information and you have authority to provide it to us, and
- We may use and disclose your personal information for the purposes of electronic verification as described above.
- You're not aware, and have no reason to suspect, that the money you use to fund your account has been or will be derived from or related to any money laundering, terrorism financing or by agreement; and
- The processes of your investment will not be used to finance any illegal activities.