



KNOW YOUR CUSTOMER (KYC) POLICY

Dated: 28 December 2018

1. What is KYC

1.1 ZT Markets Limited (hereinafter called the "Company") is an entity incorporated under the International Business Companies (Amendment and Consolidation) Act, Chapter 149 of the Revised Laws of Saint Vincent of the Grenadines, 2009, with the following registrations: Company Number 25071IBC2018.

1.2 Know Your Customer (KYC) refers to the due diligence activities that the Company must perform to provide services to you. KYC procedures are required to establish certain information about our customers for compliance with the relevant legislation and to ensure the probity of the Company's customers and their activities.

2. What is the Company's KYC verification process?

2.1 To fulfil the necessary KYC verification process, the Company will require Customers to provide a copy of certain valid identification documents. This request will be communicated to the client during the registration process or via the email address registered with the Company's website at <https://zentrader.com>.

2.2 Verification documents must be uploaded at the client portal.

2.3 We may contact you via your registered telephone details or email to further facilitate the verification process if it is necessary.

3. Why am I being asked to undergo the KYC verification process?

3.1 You may be required to undergo our KYC verification process as a result of:

- (a) Upon initial account registration
- (b) You updating certain personal information on your account;
- (c) Lack of certain information relating to you, your trading account or your transaction(s) with the Company;
- (d) Discrepancies or inconsistencies of information relating to you, your trading account or your transaction(s) with the Company;
- (e) Promotional claims;
- (f) Certain activity levels or thresholds being triggered; or
- (g) Our routine or random checking

3.2 Notwithstanding the above, the Company reserves the right to perform KYC verification on any of our Customers as and when we deem necessary or appropriate.

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4. What documents do I need to provide for KYC verification?

4.1 You may be required to provide us with a copy of a document from each of the following categories when requested:

- (a) Government issued photo ID. The document should show your name, date of birth and be currently valid.
 - a) National Identification Card (front and back copy)
 - b) Driver's License (front and back copy)
 - c) Passport
 - d) Other Identification Card issued by government/ known government agency/ body (front and back copy)

- (b) Proof of Residential Address. The document should show your name, residential address and be issued within the last 180 days.
 - i. Utility Bill
 - ii. Bank Account Statement / Credit Card Statement from a recognised bank
 - iii. Council Tax Bill
 - iv. Mortgage Statement from a recognised lender

4.2 For corporate traders and corporate introducing brokers the following documents are required:

For directors:

- (a) A clear colour copy of valid passport or other government-issued photo identification;
- (b) Proof of residential address issued within the preceding 180 days, such as a driver licence, utility bill, bank statement or credit card statement

Company documents:

- (a) Certificate of incorporation
- (b) List of present directors and shareholders
- (c) The advice of registered office and address for service

4.3 All documents must be clear and legible. Scan or capture the full document.

4.4 The documents must be valid or recent (not older than 180 days) showing your full name, address, and document validity date.

4.5 Documents addressed to PO Box number are unacceptable for validation. You may be asked to send additional supporting documents such as Birth Certificate, Visa or Entry Permit, etc. due to missing information or discrepancies.

4.6 Upload the documents at the client portal using your log-in account credentials at <http://zentrader.com>

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5. What if I do not have the required documents?

5.1 If you do not have any of the required documents, other official documents or evidence issued by authorised authorities may be accepted. These will be reviewed on a case-by-case basis.

6. What additional documents are required should I wish to change my person account details?

6.1 To make changes to your personal account details such as name or address, the following steps must be followed:

- a) Make the necessary change request by submitting a ticket in the client dashboard using your log-in account credentials at <http://zentrader.com>
- b) Upload the new documents according to our above guideline in Section 4 or send the documents as an attachment using your registered email address to support@zentrader.com

7. What language documents do you accept?

7.1 All documents provided must be in Japanese, English or Indonesian. For other languages, we require a photo or scan of the original document accompanied by a certified or sworn translation.

8. Can I provide a photocopy of a document?

8.1 You can submit a photocopied document but we encourage you to provide us with a scanned or smartphone camera image, coloured copy instead due to the quality of images.

8.2 In the event that a photocopied document is of poor quality, we may require you to provide us with a certified true copy of your document with stamp clearly reflected on it.

9. Can I provide only a part of my document where the required information is shown?

9.1 Please provide us with a copy of the full document - cropped or half page copy of any document is not valid for our verification purposes.

9.2 However, you may choose to cover some sensitive data (e.g. bank statement balances) for your own security.

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10. When do I need to provide these KYC documents?

10.1 As part of your account verification process, you will be required to provide your ID and proof of residency. In some cases, we require additional information. When this happens you will receive an email notification from our Compliance Department requiring you to submit documents for KYC verification.

10.2 You should provide all the required documents at your earliest possible convenience upon the receipt of such email to avoid any delays in processing your transactions and/or reduce/prevent interruptions to the continuing use of your trading account.

11. How should I submit the required KYC documents?

11.1 Upload the documents at the client portal using your log-in account credentials at <http://zentrader.com> or send the documents as an attachment using your registered email address to support@zentrader.com

12. What if I do not have access to a scanner?

12.1 If you do not have access to a scanner, you may capture the required documents using a digital camera or phone camera.

Submit to us from within your secure <http://zentrader.com> account portal or email to support@zentrader.com from your registered email address.

13. How will I know if the submitted documents are sufficient for KYC verification purposes?

13.1 You will receive an email notification from our support team to inform you of the status of your documents and application. If you have not received a notification within 3 business days, please get in touch with the support team.

14. Are my KYC documents safe with you?

14.1 We take data protection very seriously. We are committed to maintaining the confidentiality of the personal information collected by us.

14.2 We will use technical and organisational measures to safeguard your personal data, for example:

- i. access to your account is controlled by password and username which are unique to you
- ii. we store your personal data on secure servers
- iii. we store your personal data in an encrypted format on our secure servers

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14.3 Whilst we will use all reasonable efforts to safeguard your personal data, you acknowledge that the use of the internet is not entirely secure and for this reason, we cannot guarantee the security or integrity of any personal data which are transferred from you or to you via the internet.

14.4 We ask that you read the Privacy Policy carefully as it contains detailed information about how we will use and protect your personal data.

15. Can I request my personal ID documents to be deleted after verification or account closure?

15.1 We have regulatory and legal obligations to maintain Customers' records for a minimum period of 7 years. We will ensure that all personal information supplied is held securely.

16. How long is the account verification processing time?

16.1 Provided full and complete documents are received, we shall take no more than 24 hours upon the receipt of your email or uploaded document to complete the verification process. Under certain circumstances, however, longer processing time may be required.

In any event, we will endeavour to complete the verification process within the shortest possible time frame.

17. Will I be required to undergo KYC verification more than once?

17.1 You will not be subject to the same KYC document verification checks more than once, unless the documents you submitted in the last KYC verification process had expired, e.g. passport validity period expires, or where a reasonable period since the last KYC verification process has passed, in which case you may be required to re-submit valid and current documents.

17.2 Notwithstanding the above, you may be subject to different levels of KYC verification checks in the course of your relationship with the Company.

18. What if I refuse to provide any or all of the required documents for KYC verification purposes?

18.1 If we do not receive all of the required documents from you, or we do not receive them within the given time frame, your trading account verification will be void.

18.2 As a result, your trading account will be bound by a number of restrictions which may include, but not limited to, the following:

- (a) Trade restrictions or limitations

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- (b) Voiding of the relevant transaction(s)
- (c) Cancellation of trades including forfeiture of any winnings
- (d) Closing of your trading account

18.3 You must complete the KYC verification process successfully in order to continue any further transactions on your trading account.

19. RELEVANT DEPARTMENT

Customer Service Department

Email: support@zentrader.com

Compliance Department

Email: compliance@zentrader.com

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