



SVG PRIVACY POLICY

Last Updated on: 12 May 2023

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Introduction

This Privacy Policy ("Policy") describes how Zero Markets LLC ("Zero Markets", "we", "us", or "our") collects, uses, discloses, stores, transfers, and otherwise processes personal information. It applies to all individuals whose personal data we process in connection with our financial products and services offered to clients in Vietnam and globally.

This Policy is governed primarily by the laws of St. Vincent & the Grenadines, including the Privacy and Freedom of Information Act 2003, and the St. Vincent & the Grenadines Anti-Money Laundering and Terrorist Financing Regulations 2014. To the extent that personal information is collected from or relates to individuals located in the Socialist Republic of Vietnam, this Policy also complies with the Law on Cybersecurity 2018 (No. 24/2018/QH14) and Decree No. 13/2023/ND-CP on Personal Data Protection ("Vietnam PDPD").

Definitions

In this Privacy Policy the following terms have the meanings set out below:

- "Credit information" is personal information (other than sensitive information) that relates to an individual's credit history or credit worthiness, and is further defined in the Privacy Act;
- "Disclosing" information means providing information to persons outside Zero Markets;
- "Individual" means any persons whose personal information we collect, use or disclose;
- "Personal information" means information or an opinion relating to an individual, or reasonably identifiable individual. Under the Vietnam PDPD this includes all information that identifies or can identify a natural person, including name, date of birth, gender, place of residence, personal identification number, phone number, email address, and IP address;
- "Privacy Officer" means the contact person within Zero Markets for questions or complaints regarding Zero Markets' handling of personal information;
- "Sensitive information" under the Vietnam PDPD includes political views, religion, health and medical data, genetic data, biometric data, financial data, location data, and data relating to sexual orientation or criminal records;
- "Use" of information means use of information within Zero Markets.
- "Vietnam PDPD" means Decree No. 13/2023/ND-CP on Personal Data Protection (effective 1 July 2023).

1. What kind of personal information do we collect and hold?

We collect and hold the following kinds of personal information about individuals:

- Name;
- Address;
- Contact details;
- Date of birth;
- Employment details and source of funds;
- Bank account details and payment information;
- Trading history and account activity;

- Government-issued identification documents (such as passport, utility bills or drivers' licences) required under AML/CTF obligations;
- Credit information (if expressly authorised by the individual); and
- IP address, device identifiers and geolocation data (collected automatically via our website and platforms)
- any other information that is relevant to the services that we provide.

Under the Vietnam PDPD, financial account data, transaction data, and geolocation data are classified as sensitive personal data. We process such data only on the legal bases set out in Section 5 below.

2. How we collect personal information

We generally collect personal information directly from you. This occurs when you:

- Submit an account application online or in person
- Visit our website or use our trading platforms
- Call us, email us, or send us correspondence
- Use live chat or other interactive features on our website

We may also collect personal information from third parties including:

- Introducing brokers or affiliates who refer you to us
- Credit reporting bodies (for identity and creditworthiness assessment)
- Identity verification service providers (electronic KYC)
- Publicly available sources such as government registers

Zero Markets will not collect sensitive information (or sensitive personal data under the Vietnam PDPD) unless you have provided explicit, informed, and freely given consent, or an applicable legal exemption applies (e.g., where collection is required by law or is necessary to prevent unlawful activity).

Zero Markets LLC does not offer the option of dealing anonymously or under a pseudonym. We are required to identify all trading clients under the St. Vincent & the Grenadines Anti-Money Laundering and Terrorist Financing Regulations 2014 (as amended) and equivalent Vietnam AML/KYC requirements.

3. Unsolicited personal information

Zero Markets may receive unsolicited personal information. Zero Markets' employees are required to notify the Privacy Officer of all unsolicited personal information received by them. We destroy all unsolicited personal information, unless the personal information is relevant to Zero Markets' purposes for collecting personal information.

4. About whom do we collect personal information?

The personal information we may collect may relate to:

- Clients and prospective clients;
- Introducing brokers, affiliates and money managers;
- Service providers or suppliers;
- prospective employees, employees and contractors;
- Trustees, partners, company directors, and authorised agents

- Other third parties with whom we come into contact.

5. Why does ZERO MARKETS collect and hold personal information?

We collect and use personal information for the following purposes:

- To consider and assess an application to open a trading account;
- To establish and manage the individual's trading account, including margin call notifications;
- To provide information about our services, market trends and special offers;
- To protect our business and clients from fraudulent or unlawful activity;
- To conduct our business and perform other management and administration tasks;
- To consider concerns or complaints;
- To manage legal actions involving Zero Markets;
- To comply with relevant laws, regulations and other legal obligations; and
- To improve products and services and enhance our overall business.

Under the Vietnam PDPD, we rely on the following legal bases:

- Your explicit consent (where required), including for the processing of sensitive personal data (Article 11 PDPD)
- Performance of a contract to which you are a party, or pre-contractual steps at your request
- Compliance with a legal obligation applicable to Zero Markets
- Legitimate interests pursued by Zero Markets, where not overridden by your fundamental rights and freedoms

6. How might we use and disclose personal information?

We use and disclose personal information for the primary purposes listed in Section 5, for reasonably expected secondary purposes, and in other circumstances authorised by law. Specific uses include:

- Planning, performing, managing and administering your contractual relationship with us;
- Maintaining and protecting the security of our products, services and websites or other systems;
- Ensuring compliance with legal and regulatory obligations (including AML/CTF screening, export controls, and trade sanctions);
- Conducting automated checks of your contact data against applicable sanctioned-party lists;
- Resolving disputes and enforcing contractual agreements;
- With your express consent: communicating marketing-related information about ZERO MARKETS's products, technologies, services, and events.

Sensitive information will be used and disclosed only for the purpose for which it was provided, a directly related secondary purpose, or permitted by law.

We engage other people to perform services for us, which may involve that person handling personal information we hold. In these situations, we prohibit that person from using personal information about the individual except for the specific purpose for which we supply it. We prohibit that person from using the individual's information for the purposes of direct marketing their products or services.

Zero Markets will attempt to destroy or de-identify sensitive information wherever possible. We also undertake to take reasonable steps to destroy or de-identify all personal information about an

individual when it is no longer needed.

7. To whom might we disclose this personal information?

We may disclose personal information to:

- Related entity of Zero Markets;
- Agents, contractors or service providers (lawyers, accountants, debt collectors, marketing agencies, IT providers);
- Organisations involved in a transfer or sale of all or part of our assets or business;
- Payment merchants and other financial institutions;
- Regulatory bodies, government agencies, law enforcement bodies and courts;
- Liquidity providers and trade repositories;
- Your introducing broker, co-account holder, or authorised agent;
- Anyone else you authorise us to disclose to, or is required by law.

We prohibit third-party service providers from using personal information except for the specific purpose for which it is supplied, and from using it for their own direct marketing.

8. Sending information overseas

We may disclose personal information to recipients located outside Vietnam and outside St. Vincent & the Grenadines, including to introducing brokers worldwide and to cloud data storage providers whose servers are located in the United States of America.

Where personal information of individuals located in Vietnam is transferred outside Vietnam, we comply with the cross-border transfer requirements of the Vietnam PDPD (Articles 25–26), including:

- Obtaining your consent to the transfer (where required)
- Ensuring the recipient country or organisation provides an adequate level of protection equivalent to Vietnam PDPD standards
- Implementing appropriate contractual safeguards
- Notifying the Ministry of Public Security where required by law

We will not send personal information to recipients located outside Vietnam unless: (a) we have taken reasonable steps to ensure the recipient does not breach applicable privacy laws; (b) the recipient is subject to an equivalent privacy scheme; or (c) you have consented to the disclosure.

9. Management of personal information

Zero Markets recognises how important the security of personal information security. We seek to protect all personal information we collect from interference, misuse or loss, unauthorised access, modification or disclosure. Security measures we apply include:

- Regular passwords audits are access control reviews;
- Role-based access restrictions; access capabilities updated upon role changes;
- Automatic logging and review of unauthorised external access attempts;
- Data minimisation on screen outputs;
- Physical and electronic security for all personal containing personal data;
- Encryption of data during transmission over external networks;

- Restricted print reporting of personal data.

We retain personal information for as long as required to provide you with our services and to fulfil our legal and regulatory retention obligations. Personal information is securely deleted or de-identified when it is no longer needed for these purposes.

Under the Vietnam PDPD, personal data of Vietnamese individuals is stored in Vietnam to the extent required by applicable law. Where storage outside Vietnam is necessary, we comply with the cross-border transfer rules set out in Section 8 above.

10. Direct Marketing

Zero Markets does not use personal information for the purposes of direct marketing unless: (a) the information does not include sensitive information; (b) the individual would reasonably expect such use; (c) we provide simple opt out mechanism; (d) you have not opted out.

Where your permission is required for marketing communications (including under the Vietnam PDPD), we will only send such communications where you have explicitly opted in. You may withdraw consent and opt out at any time by contacting us at the details below or by using the unsubscribe link in any marketing email.

11. Your Rights in Relation to Personal Information

Subject to applicable law, you have the following rights regarding your personal information:

- Access — request a copy of the personal information we hold about you
- Correction — request correction of inaccurate or incomplete information; we will correct within 30 days where satisfied the information is inaccurate
- Deletion — request deletion of personal information where no longer required for our purposes or required by law
- Restriction — request restriction of processing in certain circumstances
- Data portability — request your personal data in a structured, machine-readable digital format
- Objection — object to processing based on legitimate interests or for direct marketing purposes
- Withdrawal of consent — withdraw consent at any time where processing is consent-based (without affecting the lawfulness of prior processing)

These rights apply under both the St. Vincent & the Grenadines Privacy Act and the Vietnam PDPD. To exercise any right, please contact the Privacy Officer using the contact details below. We will respond within 30 days of your request.

We may charge a reasonable administrative fee for access requests to cover search and reproduction costs. We will not charge for corrections.

12. Identifiers

We will not use government-assigned identifiers (such as national identification numbers, tax file numbers, or equivalent identifiers issued by Vietnamese authorities) for our own file recording purposes, unless an applicable legal exemption applies. Zero Markets endeavours to avoid data-matching.

13. Cookie Policy

When you visit www.zeromarkets.com, we and our marketing and advertising partners place cookies and similar tracking technologies on your device to track measure advertising outcomes, and record your interests in our products and services.

Cookies used by us and our partners do not directly collect personal information such as your name, email address, or phone number. You may disable cookies in your browser settings; however, disabling cookies may affect the functionality of our website and your user experience.

Under the Vietnam PDPD, device identifiers and IP addresses may constitute personal data. By using our website, you consent to the use of cookies as described in this Policy. Where required, we will obtain your explicit consent before deploying non-essential cookies.

14. European Union

If you are located in the European Union, the General Data Protection Regulation (Regulation (EU) 2016/679) applies to the processing of your personal information in addition to the provisions of this Policy.

Where your permission is required for marketing-related communications, we will only send such communications with your prior opt-in consent. You may unsubscribe at any time.

In addition to the rights set out in Section 11, EU residents may:

- Lodge a complaint with the relevant data protection supervisory authority in your country (e.g., the Information Commissioner's Office in the UK: www.ico.gov.uk)
- Request erasure of your personal data to the extent permitted by St. Vincent & the Grenadines law (noting that certain data must be retained for AML/CTF compliance)

Our GDPR Representative (Privacy Officer) can be reached at:

Email: compliance@zeromarkets.com

15. Electronic Verification Terms and Conditions

Zero Markets LLC is required by the St. Vincent & the Grenadines Anti-Money Laundering and Terrorist Financing Regulations 2014 (as amended) and applicable Vietnamese AML requirements to verify your identity before providing financial products and services. We use electronic verification tools and external data sources for this purpose.

Verification Process

We will ask you to provide personal details (such as name, address, date of birth) and identification document details. This information is passed to external organisations who match it against their databases, including:

- Credit information files held by third party (for identity confirmation purposes only – this is not a credit check)
- Publicly available information such as electoral rolls and white pages
- Information held by official record holders via authorised third-party systems

It is an offence under applicable AML regulations to provide false or misleading information about your identity.

Your Agreement

By agreeing to our Terms and Conditions, you confirm that:

- The information you provide is your own personal information and you have authority to provide it to us
- We may use and disclose your personal information for electronic verification purposes as described above

16. Complaints Handling

If you wish to make a complaint about our handling of your personal information, please follow the process below:

- Gather all supporting documents relating to your complaint
- Contact your account manager directly — early contact gives us the best chance to resolve your complaint promptly
- If your account manager cannot satisfactorily resolve your complaint, ask them to escalate to their manager
- If your complaint concerns your account manager or remains unresolved, contact our Compliance department directly

You may also contact our Compliance team directly at email: compliance@zeromarkets.com

We aim to resolve most matters within 21 days. Complex complaints may take longer; we will keep you informed of progress.

If you are located in Vietnam and are dissatisfied with our resolution, you may lodge a complaint with the Ministry of Public Security (Department of Cybersecurity and High-Tech Crime Prevention) or another competent Vietnamese authority in accordance with the Vietnam PDPD.

17. Data Breach Reporting

Subject to applicable law (including the St. Vincent & the Grenadines Privacy and Freedom of Information Act 2003 and, where applicable, the Vietnam PDPD), Zero Markets is required to report certain data breaches.

Should any staff member become aware of a possible data breach involving confidential data accessed without authorisation, this must be immediately reported to the Compliance Manager. The Compliance Manager, in conjunction with Senior Management, will investigate and, if serious harm could result, take appropriate action in accordance with applicable law, including notification to affected individuals and relevant regulatory authorities.

Under the Vietnam PDPD, in the event of a data breach affecting Vietnamese individuals, we will notify the Ministry of Public Security within 72 hours of becoming aware of the breach, where required.

18. Internal Governance

Responsibilities

It is the responsibility of management to inform employees and other relevant third parties of this Privacy Policy and any changes to it. All employees and relevant parties must understand and comply with this Privacy Policy.

Privacy training

All new employees receive timely access to this Privacy Policy. Employees are provided with opportunities to attend privacy training covering our obligations under applicable Privacy laws.

Non-compliance and disciplinary actions

Privacy breaches must be reported to management. Ignorance of this Policy is not an acceptable excuse for non-compliance. Employees or third parties who breach this Policy may be subject to disciplinary action.

Contractual arrangements with third parties

Zero Markets must ensure that all contractual arrangements with third parties adequately address privacy obligations. Third parties are required to implement policies covering:

- Lawful collection, use and disclosure of personal and sensitive information;
- De-identifying wherever possible;
- Secure storage with access limited to authorised personnel
- Disclosure only to organisations approved by Zero Markets

19. Updates to This policy

This Policy will be reviewed from time to time to reflect new laws, technology, changes to our operations, and the business environment. Material changes will be communicated via our website. Continued use of our services after any update constitutes acceptance of the revised Policy.



Should you have any questions or enquiries, please don't hesitate to

contact Zero Markets LLC

hotro@zeromarkets.com

www.zeromarkets.com