



**NAGA GLOBAL LLC**

**PRIVACY POLICY**

**September 2022**

## Table of Contents

1. INTRODUCTION	3
2. WHAT INFORMATION WE COLLECT	3
3. USE OF INFORMATION	5
4. DISCLOSURE OF INFORMATION	7
5. COMMUNICATION	8
6. SAFEGUARD MEASURES	9
7. THE RIGHTS OF A DATA SUBJECT	9
8. FUTURE AMENDMENTS	10
9. ENQUIRIES	10

## 1. INTRODUCTION

- 1.1. **NAGA GLOBAL LLC** (hereinafter referred to as the “**Company**”, “**we**”, “**us**”, “**our**”), is incorporated under the laws of Saint Vincent and the Grenadines with Registration 1189 LLC 2021. The Company is authorised as an International Business Company under the Limited Liability Companies Act Chapter 151 of Saint Vincent and the Grenadines 2009 (herein the “**Law**”).
- 1.2. The Company in accordance with the provisions of the Law, outlines in the Privacy Policy (herein the “**Policy**”) how the Company collects, maintains, uses and discloses personal information of the Client.
- 1.3. This Policy applies to existing and prospective Clients as well as to any visitors of the Company’s website(s).
- 1.4. The Company is committed to protecting and respecting the privacy of the Client’s personal data which it obtains during the Account Opening process including information obtained during a Client’s visit to the Company’s website(s).
- 1.5. This Policy together with our Terms and Conditions available through our website, here, and any other documents referred to in them, sets out the basis on which any personal data we collect from you and about you, or when you communicate with us by email, telephone or post will be processed by the Company.
- 1.6. We are the data controller of your personal data and as a result we are responsible for deciding how we hold and use personal data about you and we are required to notify you of the information contained in this Policy. Please read this Policy carefully to apprehend our practices in regards to your personal data and how we treat it.

## 2. WHAT INFORMATION WE COLLECT ABOUT YOU AND HOW WE USE IT

- 2.1. The Company will use the Client’s personal data in accordance with worldwide data protection practices. The Company will use, store, process and handle personal information of the Client, only in accordance with the Law, this Policy and the Company’s Terms of Business.
- 2.2. The Client must first complete the online application form found on the Company’s website(s), accept and submit the online application form to the Company and provide to the Company all the required documents to open an account with the Company. By

completing the online application form the Client is requested to provide the Company with private information in order for us to evaluate the Client's application and comply with the applicable laws and regulations governing the provision of financial services.

When you apply to create an account, the Company need to collect some or all of the following details about you:

- i. Name;
- ii. Residential Address;
- iii. Date of Birth;
- iv. Utility Bill;
- v. Email address;
- vi. Telephone Numbers;
- vii. Identification document numbers such as passport, driving license or ID card;
- viii. Photo of yourself;
- ix. Payment Card details (including credit card / debit card and bank account details and/or other necessary financial information);
- x. Corporate documentation details in case of an entity.

- 2.3. This information shall be used by the Company to contact the Client for information about the services offered by the Company.
- 2.4. From time to time the Company may also request further information to improve its' Services to the Clients.
- 2.5. The Client must inform the Company immediately if there are any changes regarding his personal identification information and/or any other information which is relevant to the Company for the Provision of Financial Services to the Client by sending an email to [service@naga-global.com](mailto:service@naga-global.com)
- 2.6. You will not be able to apply to create an account or order products or services from the Company without providing this information.
- 2.7. When you contact us, the Company will need to collect personal data about you to verify your identity before we disclose any information to you for data security purposes. The Company will be unable to deal with your query unless you provide the information requested. The Company may also collect any other personal data you choose to provide us when you communicate with us, but will be used only for the purposes of dealing with

---

**NAGA Global LLC**

Address: First Floor, First St. Vincent Bank Ltd, James Street, Kingstown, St. Vincent and the Grenadines Tel.: +44 20 3966 4543 | Website: [www.naga-global.com](http://www.naga-global.com) | Email: [support@naga-global.com](mailto:support@naga-global.com)



your inquiry.

### 3. USE OF INFORMATION - PURPOSE AND LEGAL BASIS

**We will use your personal data where we have a lawful basis to do so. We will only use you data:**

Where it is necessary for us to enter into and/or perform an Agreement with you. For example, to create your account and provide payment services to you.

In cases where might reasonably be expected as part of running our business and which does not materially impact your interests, rights or freedoms. For example, to improve how we manage and process your payments.

To comply with our legal obligations. For example, to pass on details of people who are involved in fraud and to carry out anti-money laundering checks.

#### 3.1. The Company may need Clients' Personal Information:

**3.1.1.** To verify the Client's identity;

**3.1.2.** To process the Client's transaction;

**3.1.3.** To manage the account the Client holds with the Company;

**3.1.4.** To send to the Client any information about transactions services;

**3.1.5.** To inform the Client about new products of Company, services and any other

**3.1.6.** information relevant to the Client's business relationship with the Company; and To share information with our suppliers and other third parties such as banking institutions, payment facilitators and card operators only when required for the services provided to the client.

#### 3.2. Under the applicable laws and regulations, the Company is required to keep records containing Client personal data, trading information, account opening documents, communications and anything else which relate to the Client.

The table below sets out further information about the purposes for which we use data about you, with the corresponding methods of collection and legal basis that we rely upon for its use.

PURPOSE	LAWFUL BASIS OF PROCESSING
<b>Creating and managing your account</b> <ul style="list-style-type: none"><li>to apply and create your account</li><li>to administer and manage your account</li></ul>	To fulfil our contractual obligations to you in providing the account and services.

#### NAGA Global LLC

Address: First Floor, First St. Vincent Bank Ltd, James Street, Kingstown, St. Vincent and the Grenadines Tel.: +44 20 3966 4543 | Website: [www.naga-global.com](http://www.naga-global.com) | Email: [support@naga-global.com](mailto:support@naga-global.com)

<ul style="list-style-type: none"> <li>to retain your account profile information</li> </ul>	<p>Our legitimate interests in operating and improving our services to you.</p> <p>Our legal obligations to comply with regulations that apply to us.</p>
<p><b>Carrying out identification and fraud checks</b></p> <ul style="list-style-type: none"> <li>to carry out the required checks on your identity and enable you to use your account and services provided by the Company</li> </ul>	<p>To fulfil our contractual obligations to you in providing the account and services correctly.</p> <p>Our legitimate interests in operating and improving our services to you and how we deal with financial crime.</p> <p>Our legal obligations to comply with regulations that apply to us.</p>
<p><b>Facilitating your use of your account</b></p> <ul style="list-style-type: none"> <li>to administer your financial transactions (e.g., trading, investing, payment, refunds etc.)</li> <li>to provide details of your transactions</li> <li>to retain records of your transaction activities</li> </ul>	<p>To fulfil our contractual obligations to you in providing the account and services.</p> <p>Our legitimate interests in operating and improving our services to you.</p> <p>Our legal obligations to comply with regulations that apply to us.</p>
<p><b>Monitoring your use of the account to detect fraudulent behavior</b></p> <ul style="list-style-type: none"> <li>to detect, and prevent financial crime</li> <li>to satisfy our legal and regulatory obligations</li> <li>to manage risk for us, you and our other users</li> </ul>	<p>To fulfil our contractual obligations to you in providing the account and services correctly.</p> <p>Our legitimate interests in operating and improving our services to you and how we deal with financial crime.</p> <p>Our legal obligations to comply with regulations that apply to us.</p>
<p><b>Communicating with you and providing you with customer support</b></p> <ul style="list-style-type: none"> <li>to investigate your complaint or query</li> <li>to inform you of important information or changes to your terms and conditions</li> </ul>	<p>To fulfil our contractual obligations to you in providing the account and services.</p> <p>Our legitimate interests in operating and improving our services to you.</p> <p>Our legal obligations to comply with regulations that apply to us.</p>
<p><b>Sharing data with our suppliers and other third parties (such as banking institutions, payment facilitators) where required</b></p> <ul style="list-style-type: none"> <li>see the section <i>Disclosures of your information</i> section for more information</li> </ul>	<p>To fulfil our contractual obligations to you in providing the account and services.</p> <p>Our legitimate interests in operating and improving our services to you.</p>

	Our legal obligations to comply with regulations that apply to us.
--	--

## CHANGE OF PURPOSE

The Company will only use your personal data for the purposes for which the Company collected it.

## 4. DISCLOSURE OF INFORMATION

- 4.1. Under the Agreement, the Company has the right to disclose Client's Information (including recordings and documents of a confidential nature, card details) in certain circumstances. According to the Agreement, Clients' Information may be disclosed:
- 4.1.1. where required by law or a court order by a competent Court;
  - 4.1.2. to relevant authorities to investigate or prevent fraud, money laundering or other illegal activity;
  - 4.1.3. to a Broker so that it executes Clients' Instructions or Orders and for purposes ancillary to the provision of the Company's Services to the Client;
  - 4.1.4. to credit reference and fraud prevention agencies, third authentication service providers, banks and other financial institutions for credit checking, fraud prevention, anti-money laundering purposes, identification or due diligence checks of the Client. To do so they may check the details that Client supplied against any particulars on any database (public or otherwise) to which they have access. They may also use Clients' details in the future to assist other companies for verification purposes. A record of the search will be retained by the Company;
  - 4.1.5. to other service providers who create, maintain or process databases (whether electronic or not), offer record keeping services, email transmission services, messaging services or similar services which aim to assist the Company to collect, storage, process and use Clients' Information or get in touch with Client or improve the provision of the Company's Services or activities under the Agreement;
  - 4.1.6. to a Trade Repository or similar;
  - 4.1.7. where necessary for the Company to defend or exercise its legal rights to any court or tribunal or arbitrator or Ombudsman or governmental authority, as the case may be;



- 4.1.8. at Clients' request or with Clients' consent;
- 4.1.9. to the Company's employees so that they exercise their duties to further the Agreement, or to assure the efficient functioning of the Company's' Platform, the Automatic Orders and the Trading Data functions.
- 4.1.10. to NAGA affiliated Companies that the client may elect to seek services from and which falls within the NAGA trading or NAGA payment environment, for the purposes of processing transactions and providing services relating to his account.

## 5. COMMUNICATION

- 5.1. The Company will record, monitor and process any telephone conversations and/or electronic communications between us such as through phone, fax, email, social media, electronic message between you and NAGA. All such communications are recorded and/or monitored and/or processed by us, including but not limited to any telephone conversations and/or electronic communications that result or may result in transactions or client order services even if those conversations or communications do not result in the conclusion of such transactions. All incoming and outgoing telephone conversations as well as other electronic communications between you and NAGA will be recorded and stored for quality monitoring, training and regulatory purposes. The content of relevant in person conversations and/or communications with you may be recorded by minutes or notes. Any such records shall be provided to you upon request at the same language as the one used to provide investment services to you will be recorded and stored for quality monitoring, training and regulatory purposes.

---

### NAGA Global LLC

Address: First Floor, First St. Vincent Bank Ltd, James Street, Kingstown, St. Vincent and the Grenadines Tel.: +44 20 3966 4543 | Website: [www.naga-global.com](http://www.naga-global.com) | Email: [support@naga-global.com](mailto:support@naga-global.com)



## 6. SAFEGUARD MEASURES

- 6.1. Clients' Information is stored on secure servers. The Company limits access of Clients' Information only to those employees or partners that need to know the information to enable the carrying out of the Agreement.
- 6.2. While the Company will use all reasonable efforts to safeguard Clients' Information, Client acknowledges that the use of the internet is not entirely secure and for this reason the Company cannot guarantee the security or integrity of any personal data transferred from the Client, or to the Client via the internet.
- 6.3. Website tracking systems may also collect data detailing the pages the Client has accessed, how he discovered the Company's website, the frequency of his visits and any other action related thereof. The information the Company obtains is used to improve the content of its website(s) and may be used by the Company for contacting the Client using appropriate means for the Company to provide the Client with any information that the Company believes may be useful to the Client.

## 7. THE RIGHTS OF A DATA SUBJECT

Data protection laws provide you with the following rights to:

- **request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it;
- **request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected;
- **request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below);
- **request the restriction of processing** of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it; and
- **request a copy** of your personal data which you have provided to us, in a structured, commonly used and machine-readable format and the right to transfer it, or to require us to transfer it directly, to another controller.
- **object to the processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal data for direct marketing purposes.

---

### NAGA Global LLC

Address: First Floor, First St. Vincent Bank Ltd, James Street, Kingstown, St. Vincent and the Grenadines Tel.: +44 20 3966 4543 | Website: [www.naga-global.com](http://www.naga-global.com) | Email: [support@naga-global.com](mailto:support@naga-global.com)

- 7.1. To make a request, a Client can contact the Company at [dpo@naga-global.com](mailto:dpo@naga-global.com) verifying their identity and specify the request. The Client may be required to complete and sign the Data Subject Request Form (the Form) which will be provided to the Company and will enable the Company to identify you as a client. We may request specific information to help us to confirm your identity and proceed with your request accordingly. The Company reserves the right to charge an administrative fee if the request is considered to be unfounded or excessive. The Company may refuse to comply with the request in such circumstances.
- 7.2. If you are unhappy about how your personal data has been used please contact the Company via email at [service@naga-global.com](mailto:service@naga-global.com) or DPO at [dpo@naga-global.com](mailto:dpo@naga-global.com).

## 8. FUTURE AMENDMENTS

- 8.1. The Company reserves the right to review and amend this Policy from time to time for any reason and notify the Client of any such amendments accordingly by posting an updated version of this Policy on the Company's website(s) **or give a 15 days notice to the Client.** The Client is responsible for regularly reviewing the Policy and any amendments thereof. Subsequent use of the Company's website shall constitute Client's acceptance of any amendments in the Company's Policy.

## 9. ENQUIRIES

- 9.1. For any enquiries regarding his Policy, please contact the Company by email the Customer Support Department at [service@naga-global.com](mailto:service@naga-global.com).