

ATLANTIS CAPITAL LIMITED

PRIVACY POLICY

LATEST UPDATED IN JUNE 2026

Privacy Policy

Phone: +448000318645 **Email:** info@capitalatlantis.com **Website:** www.capitalatlantis.com
Registered Address: Ground Floor, Rodney Court Building, Rodney Bay, Gros Islet, St. Lucia

1. Introduction

At **Atlantis Capital Limited** (the “Company”, “we”, “us”, or “our”), we are committed to protecting the privacy and security of your personal information. This Privacy Policy ("Policy") explains how we collect, use, store, disclose, and protect your personal data when you:

- i. Visit company website, www.capitalatlantis.com (the “Website”);
- ii. Access or use our products and services; or;
- iii. Apply for, or otherwise engage with, any products or services offered by the Company.

This Policy applies to the personal data of our Clients, prospective Clients, authorised representatives, and Website visitors. It describes how the Company processes personal information in accordance with applicable data protection and privacy laws and the measures we take to ensure that such information is handled fairly, securely, and transparently.

This Policy applies only to the Company’s own processing of personal data and does not extend to the privacy practices, websites, or services of any third party that may be linked to or accessible through the Website.

2. DEFINITIONS

2.1. For the purposes of this Policy:

(a) Cookies: Small data files stored on your device’s hard drive or memory. These help us enhance your experience by showing which parts of our website and services are most frequently used and tracking visit counts. To learn more about cookies and how to manage or disable them, please refer to the link provided.

(b) Log files: Records of activity on the Website that collect information such as your IP address, browser type, Internet service provider, referring and exit pages, and the date and time of your visit.

(c) Personal data: Any information that can directly or indirectly identify an individual, either on its own or when combined with other data—such as your name, ID number, or location details.

(d) Processing: Any action taken with respect to personal data, including but not limited to collecting, recording, organizing, storing, modifying, retrieving, using, sharing, or deleting that data.

(e) Web beacons: Small electronic files embedded in emails or on the Website. These help us deliver cookies, monitor visits, and evaluate the effectiveness of our communications and marketing campaigns.

3. Personal Data Information We May Collect (or Receive) About You

3.1. To open an Account with the Company, you must complete and submit the relevant application form and provide the information requested. By doing so, you consent to the collection and processing of your personal information for the purposes of assessing your application, complying with applicable legal and regulatory requirements, and administering your relationship with the Company. Where permitted by applicable law, the Company may also use your information to provide updates or communications regarding its Products and Services.

3.2. We may collect and process various categories of personal, identification, financial, and account-related information, including, without limitation:

- a) your full name, residential address, email address, telephone number, and other contact details;
- b) personal identification details, including date and place of birth, gender, citizenship, and nationality;
- c) financial information, including income, source of funds, source of wealth, assets, liabilities, bank account details, financial statements, and trading-related information;
- d) information relating to your trading Account(s), including balances, Transactions, account activity, enquiries, correspondence, and our responses;
- e) information regarding whether you are, or have previously been, a Politically Exposed Person (“PEP”), or otherwise connected with a PEP;
- f) employment and professional information, including employer details, occupation, and job title;
- g) authentication and verification information, including signatures and other security credentials;
- h) technical and location-related information, including IP address, device information, and related electronic identifiers;
- i) information concerning your trading experience, investment knowledge, financial sophistication, risk profile, and trading history;
- j) identity verification and due diligence information, including passports, national identity cards, driving licences, Tax Identification Numbers, and information obtained from lawful public or third-party sources;

- k) documents used to verify your residential address, including utility bills, bank statements, or similar supporting records; and
- l) other financial and suitability information, including payment card details, tax information, credit arrangements, loan information, investment objectives, financial circumstances, and preferences where relevant to the Services provided.

3.3 The Company may collect and process the personal data described above in relation to individuals who: (a) visit or access the Company's Website; (b) use any Products or Services made available through the Website; or (c) are current, former, or prospective Clients of the Company.

This may also include persons connected with corporate or institutional Clients, including directors, company secretaries, authorised representatives, shareholders, nominees, ultimate beneficial owners, legal representatives, agents, and any other person authorised to act for or on behalf of a Client

Minors

Individuals under the age of eighteen (18) ("Minors") are not permitted to access or use the Company's Services. The Company does not knowingly collect or process personal data relating to Minors. Any person under the age of eighteen (18) should not use the Company's Services or provide any personal information to the Company.

If the Company becomes aware that personal data has been provided by or collected from a Minor, it will take reasonable steps to delete such information promptly, subject to applicable legal or regulatory requirements. Any concerns regarding the possible submission of personal data by a Minor should be reported to the Company using the contact details published on its Website.

4. How We Collect Your Personal Information

- 4.1. We may collect personal information directly from you through your interactions with the Company, including when you visit our Website, use our mobile applications or other digital services, complete account-opening or demo registration forms, subscribe to communications, or contact our customer support or other representatives.
- 4.2. We may also obtain personal information from third parties where necessary for legal, regulatory, compliance, or verification purposes, including identity verification providers, credit reference agencies, financial institutions, and similar service providers. Where you interact with the Company through a third-party platform or social media service, such as LinkedIn or Facebook, we may receive certain information from that platform in accordance with its terms, your privacy settings, and applicable law.
- 4.3. We may collect and maintain information relating to your trading activity, including: (i) the Financial Instruments or products you trade and the outcome of those Transactions;

- (ii) historical information concerning your trading activity, investment amounts, and account usage; and (iii) your preferences, interests, or patterns relating to particular Financial Instruments, products, or Services
- 4.4. From time to time, we may request additional personal information on a voluntary basis, including through surveys, questionnaires, or market research. Where such information is necessary to provide a particular Product or Service, failure to provide it may limit or prevent our ability to fulfil the relevant request.
- 4.5. We may record and retain communications between you and the Company, including telephone calls, emails, electronic messages, meetings, and other interactions relating to our Services or business relationship. Such records remain the property of the Company and may be used for evidentiary, compliance, monitoring, training, or other lawful purposes. Telephone calls may be recorded without prior notice or an audible warning, where permitted by applicable law.

5. Personal Information Collected Automatically

- 5.1. When you access or use our Services, we automatically collect information about you, including:
- a) **Log Data:** We collect data related to how you use our services, such as your browser type, app version, access times, pages visited, IP address, network identifiers, and the website you came from before accessing our services.
 - b) **Device Data:** We gather information about the device you use to access our services, including details like the hardware model, operating system and version, unique device ID, and your mobile network provider.
 - c) **Website Activity:** We maintain records of your interactions on our website, including content you submit, account-related actions, and details of deposits, withdrawals, and transactions, such as amount, currency, time, and payment method used.
 - d) **Location Data:** With your device's permission, we may collect precise geolocation information.
 - e) **Cookies and Tracking Tools:** We may collect data through cookies already stored on your device and other tools like web beacons and log files. These technologies help us gather insights into your behavior and improve your experience. For more details, please refer to our Cookies Policy.

You can find out more about Our use of Cookies in our Cookies Policy.

6. How We May Use Your Personal Information

- 6.1. We ensure that your personal data is processed lawfully, fairly and in a transparent

manner for the following purposes and on the following lawful bases:

i. Contract Performance

As part of our contractual relationship with Clients, we process personal data for the purposes of providing and administering our Products and Services, communicating relevant information, and carrying out account-opening, onboarding, and Client acceptance procedures.

To establish and maintain a business relationship with you, we are required to verify your identity and may use third-party identity verification, credit reference, or similar service providers for this purpose. The information collected is necessary to administer the Client Account, provide the Services effectively, and comply with applicable legal and regulatory obligations.

We also process personal data to satisfy Know Your Customer (“KYC”), Customer Due Diligence (“CDD”), anti-money laundering, sanctions, and other compliance requirements imposed by applicable laws and regulations.

ii. Compliance with legal obligations

We are required to process your personal data in order to comply with applicable legal and regulatory obligations, including identity verification, anti-money laundering and sanctions screening, statutory record-retention requirements, and the disclosure of information to regulatory, supervisory, governmental, or law enforcement authorities where required or permitted by law.

Providing accurate, complete, and up-to-date personal information is necessary for us to establish, maintain, and administer our business relationship with you and to provide the requested Products and Services. Where you fail or refuse to provide information required for legal, regulatory, or contractual purposes, we may be unable to open or maintain your Account, provide certain Services, or continue the business relationship.

iii. Through Consent

We may process your personal data on the basis of your explicit consent where consent is required, including for certain marketing communications. You may withdraw your consent at any time by using the methods made available by the Company. Any withdrawal of consent shall apply prospectively and shall not affect the lawfulness of processing carried out prior to the date on which your consent was withdrawn.

iv. Safeguarding legitimate interests

We may process your personal data where such processing is necessary for the purposes of our legitimate interests or those of a third party, provided that such interests are not overridden by your fundamental rights and freedoms. This may include processing for the efficient operation of our business, the improvement of our Products and Services, fraud prevention, security, risk management, and other legitimate commercial purposes. In carrying out such processing, the Company will take appropriate measures to ensure that your rights, interests, and freedoms are adequately protected.

7. How we share your personal information

- 7.1. We will not disclose confidential Client information to third parties except where: (i) disclosure is required or permitted by applicable law, regulation, or legal process; (ii) there is a legal, regulatory, or public duty to disclose; (iii) disclosure is reasonably necessary for our legitimate business interests; or (iv) the Client has requested or expressly authorised the disclosure
- 7.2. Where personal data is disclosed, we will take reasonable steps to ensure that the recipient is aware of its confidential nature and processes it only for the relevant purpose. Recipients may include regulatory or supervisory authorities, identity verification or credit reference agencies, auditors, legal or professional advisers, affiliates, and service providers supporting the Company's operations.
- 7.3. We may share personal information within the Company and with current or future parent companies, affiliates, subsidiaries, entities under common ownership or control, and other trusted third parties, including: (i) professional advisers and specialist service providers; (ii) business introducers and commercial partners; (iii) banks, payment processors, hosting providers, technology providers, and credit reference agencies; (iv) courts, tribunals, regulators, governmental authorities, and other competent bodies; and (v) any person whom the Client has authorised to receive such information.
- 7.4. Where personal data is disclosed to banks, payment service providers, credit reference agencies, or other third parties for the provision of Services, those parties may retain and process the information in accordance with their own legal or regulatory obligations. Certain third parties may also retain records of searches or verification checks carried out on our behalf and may use such information where permitted by applicable law.
- 7.5. This Privacy Policy does not govern the processing activities of third parties acting as independent data controllers, whose processing is subject to their own privacy policies. Where third parties process personal data on our behalf, we generally require them to maintain appropriate confidentiality, security, and data protection standards and to

process such information in accordance with applicable law and the purposes for which it was disclosed.

8. Storage And Retention of Personal Information

We are committed to safeguarding your personal information regardless of how you interact with us, including in person, by telephone, by post, online, or through any other electronic means.

We retain personal data only for as long as reasonably necessary to fulfil the purposes for which it was collected, to meet legitimate business requirements, or to comply with applicable legal and regulatory obligations. Personal data may be stored in electronic or physical form and is protected through appropriate technical and organisational measures designed to prevent loss, misuse, unauthorised access, alteration, or disclosure.

When personal data is no longer required, we will securely delete, anonymise, or otherwise dispose of it, unless a longer retention period is required by applicable law. In particular, certain records may be retained for at least five (5) years following the end of the business relationship, or for such longer period as may be required under applicable anti-money laundering, regulatory, tax, or other legal obligations.

9. Security

Personal information provided when registering on the Company's Website or using its Services shall be treated as registered information and protected through appropriate technical and organisational security measures.

Access to the Client Account requires valid login credentials, and the Client is solely responsible for maintaining the confidentiality and security of usernames, passwords, and other authentication information. Registered information shall be stored securely and made accessible only to authorised personnel. Personal data transmitted to the Company shall, where appropriate, be protected through encrypted or otherwise secure communication channels designed to reduce the risk of unauthorised access, interception, alteration, or disclosure.

Any additional personal information provided outside the registered Account shall also be stored securely and restricted to authorised personnel. While the Company applies reasonable security measures to protect personal data, no method of electronic transmission or storage can be guaranteed to be completely secure. Subject to applicable law, the Company shall not be liable for unauthorised access to or misuse of personal information resulting from the Client's failure to protect login credentials, password loss, negligent handling, or other circumstances beyond the Company's reasonable control.

10. Marketing & Personal Data

Where you have provided your consent, including by subscribing to marketing communications, the Company may contact you by email, telephone, social media, or other agreed channels to provide information about its Products, Services, promotions, or other updates.

You may withdraw your consent and opt out of marketing communications at any time by using the unsubscribe option included in our communications or by contacting the Company through the details published on its Website.

Any withdrawal of consent shall apply only to future marketing communications and shall not affect the lawfulness of any processing or communications carried out before the withdrawal

11. Cookies

Cookies are commonly used to improve website functionality, performance, and user experience. You may control or disable cookies through your browser settings; however, doing so may affect the availability or functionality of certain features of the Company's Website, including secure areas such as the Trading Platform or Client Portal.

The Company may also use third-party advertising or analytics providers, including Google, to deliver advertising based on your previous interactions with the Website. Where applicable, you may manage or opt out of such personalised advertising through the relevant third-party settings.

Further information regarding the Company's use of cookies and similar technologies is available in the Company's Cookie Policy.

12. Your Rights

12.1. We are committed to helping you exercise your rights regarding your personal data. Here's how you can do so:

- a) **Right to Access:** You may request confirmation of whether we are processing your personal data. If we are, we will provide a copy of your information within 30 days of your request.
- b) **Right to Rectification:** If your personal information is incorrect or incomplete, you can request an update. If we've shared your data with others, we'll inform them of the correction where possible. Upon your request, and when legally allowed, we'll also tell you who received your data. To update your details, email us at info@capitalatlantis.com . In some cases, supporting documents may be required for

verification.

- c) **Right to Erasure (Right to Be Forgotten):** You may request deletion of your personal data if it's no longer necessary for its original purpose, or if you've withdrawn consent (where applicable), and we are not legally required to retain it. If we've shared your data, we'll notify those parties where possible. Upon request, we'll also provide the list of recipients when lawful to do so.
- d) **Restrictions of Processing:** You can ask us to limit the processing of your data under certain circumstances, such as if you contest its accuracy or object to its use. We may continue to store your data but will pause further processing. We'll notify you before lifting any restrictions and, if possible, let you know who else received your data.
- e) **Right to data Portability:** You have the right to receive a copy of the personal data you provided to us in a structured, commonly used, machine-readable format. You may also request that we transfer this data directly to another service provider or data controller, where applicable.
- f) **Right to Object/opt-out:** You may object to the processing of your data where we rely on our or a third party's legitimate interest. We will stop processing your data unless we can demonstrate compelling legal reasons to continue. Withdrawal of consent does not affect any prior lawful processing. If you no longer want us to use your data, contact us at info@capitalatlantis.com. Please note that this may limit our ability to provide you with certain services or products.

13. Links to Other Websites

The Company's Website may contain links to third-party websites for convenience or informational purposes. The Company does not control and is not responsible for the content, security, privacy practices, or data processing activities of such external websites.

Any personal information provided to a third-party website shall be subject to that third party's own privacy policy and terms. The Client is therefore encouraged to review the applicable privacy notices before providing personal information through any external website.

14. Contact Us

If you have any questions about this Privacy Policy, how we handle your personal information, or if you wish to exercise any of your legal rights mentioned above, please feel free to contact us at enquiries@capitalatlantis.com.

15. Modification

The Company may amend or update this Privacy Policy from time to time to reflect changes in applicable laws, regulatory requirements, business practices, or the manner in which

personal data is processed. Where required by applicable law, the Company will provide appropriate notice of any material changes. The most current version of this Privacy Policy will be published on the Company's Website and will remain available for review at any time.

16. Legal Disclaimer

The Company may disclose your personal information where required or permitted by applicable law, including where such disclosure is necessary to protect the Company's legal rights, comply with a court order, judicial proceeding, regulatory requirement, or other lawful process.

The Company shall not be responsible for any loss, misuse, or unauthorised processing of personal data arising from third-party cookies or technologies that are outside the Company's control. Subject to applicable law, the Company shall also not be liable for any unauthorised or unlawful use of personal information resulting from the loss, misuse, compromise, or negligent or malicious handling of passwords or other access credentials by the Client or any third party.