



**XP**OOKEN

**Know-Your-  
Client  
Process**

1. The main objective of the conditions herein is to establish a systemic identity verification of each Client to ensure lawful transactions with the Company. The Know-Your-Client ("KYC") Process includes disclosure of sensitive personal information that is used in daily business operations by the Company. Individuals who use the services of the Company must comply with the procedures herein.
2. In this document, the Company has established a formal process on how to submit the required information, what the necessary documents are, and to whom it will be disclosed. Also included herein are when and how the Company collects personal information and how it is used.
3. Moreover, the KYC Process also aims to determine unlawful schemes such as identity theft, grand larceny, financial fraud, terrorist financing, and other illegal types of financing. In this case, the Company invokes its right to terminate its services entirely and use the Client's submitted information if he/she is deemed involved in an unlawful scheme.
4. The Company collects the Client's information and documents when any of the following is made:
  - A.)** When the Client creates an account with the Company on the Site, his/her full name, age, date of birth, and country of residence must be provided accordingly. The Client's contact information must also be submitted, such as his/her phone number and email address. It is essential to log current and valid contact information since it will be used for daily transactions and to maintain regular communication with the Company.
  - B.)** Once the Client has an active account and starts exchanging transactions with the Company, he/she must submit the required documents to verify his/her trading account. Submitting documents can be through uploading them on the Site or by sending them to [info@xpoken.com](mailto:info@xpoken.com). The Client is obliged to use his/her registered email when sending documents to the Company.
  - C.)** Financial transactions, such as deposits and withdrawal, require the provision of bank information and other monetary details, such as the Client's preferred currency, source of income, and fund allocation for trading. The Company has the right to be informed of the Client's financial status to classify his/her trading objectives accordingly. Furthermore, due to the nature of the Company's business, the Client must also cite his/her occupation, revenue sources, daily or annual income, and financial market expenditure.
  - D.)** If the Client contacts the Company through the available means of communication, the Company's representative will ask for the Client's relevant information to identify him/her accordingly. The Company may ask for the Client's registered email, account number, and full name. The Company has the right to deny helping any individual who contacts the Company and refuses to present those details.
  - F.)** If the Client contacts the Company through the available means of communication, including on social media platforms where the Company has cited as its official page or profile, the Client's information from the relevant platform may also be obtained accordingly. The Client acknowledges and agrees that the collected data from the corresponding platform can be added to his/her Client profile in [Xpoken.com](https://xpoken.com).

5. The following information and documents are required to be submitted to confirm the identity of the Client and to verify that he/she is not committing unlawful transactions with the Company:

**A.)** Valid identification cards must be presented to simplify the users and enhance the Company's security simultaneously. ID cards can be driving license, passport, national or government-issued cards. All cards must show the date of validity, including date of birth and signature, where feasible.

**B.)** A residential proof or certificate should be presented to verify that the Client's registered address with the Company is identical to his/her current address. The residence document can be a bank statement, utility invoice, or government-issued lease contract, and all must not be dated for more than 6 months. If the Client is currently residing outside his/her country, additional residential documents may be required.

**C.)** The required identity and residential documents can also differ as applicable. The Client is obligated to submit additional documents as required by his/her country of jurisdiction and by the used payment service provider. Other documentation, as requested, is essential in completing the KYC Process.

**D.)** The Client is obligated to declare if there are differences among his/her current location, temporary address, and permanent residency, including if the Client has a dual or multiple citizenship. This declaration is to identify whether the Client is permitted to engage in transactions with the Company as appropriate and to avoid address registration issues in due course.

**E.)** If the Client used his/her credit or debit card to deposit with the Company, front and back copies of the used card must be sent. The card number should only indicate the first 6 figures and the last 4 digits, including the expiration date. For the back copy, the CVV must be covered.

**F.)** If an individual registers a trading account as corporate, a different set of required information and documents are required. Corporate accounts include identification cards of the individual representing the firm, utility bill of the firm, and legal authorization of company expenditure. Additional data may be requested by the Company if deemed necessary.

6. The Client must submit quality copies of the documents allowing the details included to be read legibly, and the details specified by law shall be recorded.

7. The Company will register the Client's personal information according to what he/she submitted. All records are treated with confidentiality and shall only be used for professional use. However, the moment that the Client provides his/her personal information to the Company, the Client hereby agrees that it can be used for business transactions and disclose it when the following occurs:

**A.)** The collected data and documents are used to verify the Client's trading account, including the deposit transactions made by the Client. Therefore, the Company has the right to disclose the collected personal data to its third-party affiliates, especially to its payment service providers, to maintain a systematic financial business transaction.

**B.)** Provision of personal details upon account creation shall forthwith give entitlement to the Company for disclosing those details to its workforce and affiliates. The relevant departments of the Company shall use those details as references in future affairs with the Client, including financial transactions, trading activities, and customer assistance.

**C.)** If a third party requests the Company in good faith to provide the Client's data, or if the Company is called for a legal obligation to disclose such data, the Company may release the Client's information and documents accordingly. However, the Company invokes its right to refuse to disclose its collected data to third parties when deemed necessary.

**D.)** When a Client is proven to be involved in any illicit affairs, including illegal financing, and most especially if it directly affects the Company's integrity, the Company holds the right to disclose the Client's data to public authorities or government bodies. The Client's data can be used as evidence in state institutions if deemed essential for cooperation with the relevant government.

8. Although the Company has established safety measures to secure Client confidentiality, the Company cannot and does not guarantee that the collected information and documents will remain private at all times. The Company shall not be liable for contingencies, such as severe system malfunctions, unauthorized access, and other issues that will affect the Client's data privacy. The Client acknowledges these risks upon his/her provision of information and documents.

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