

The procedure of trading account activation and card holders data verification.

This procedure is aimed to verify the card holder's data due to prevent the usage of funds of a third party with or without their awareness according to the AML&KYC internal policy of BT Technologies LTD.

This procedure concerns firstly the payments performed via bank cards.

Verification order:

1. After opening an account by a client and transfer of funds, the company's financial monitoring service checks the identification of the payer and the owner of a personal account. In this regard the method of the funds input is determined. If the input is made by credit card, this procedure comes into effect.
2. A client receive the form Fraud Verification to fill in. The form is sent through created request in the personal account, and is duplicated to the e-mail.
3. The checks of the questionnaire in personal account is performed, and attached scanned copies of identity documents: photo ID (passport with a photo spread in color, driver's license) are also verified.
4. In case of the absence of these documents, a client is required to fill in the questionnaire data in the personal account and to attach these documents. To do this, a client gets an additional request in the personal account.
5. Compliance Service gets client's data in order to make a phone call for information support and explanation of the verification procedures of a card holder.
6. Within 72 hours of submitting the form, a client is required to print the form, attach to specially designated areas the card used for crediting the funds to the trading account opened in the personal space. All the digits of the card number must be closed by a strip of paper, except for the last four (card mask), thus cardholder data and card expiry date should be clearly visible. A client also needs to placed in a special section of the form a document identifying the card holder (the page spread of a passport with photo). After that a client signs the form and makes the photo of a form or scans in good quality and provides it to the service of financial monitoring of the company in the answering request in the personal account or via answering email to: support@global-palace.com.
7. If card holder's data correspond to the card that used for the enrollment and coincide with the account owner's data, the restrictions on trade with OTC financial instruments are removed from the account.
8. In case of arising any doubts about the use of a credit card of a third party, the company launches the Refund procedure and the account can be blocked and and the company can refuse further providing of services to a client, within the existing client agreements.
9. The withdrawal of client's funds from a trading account can be made to the same card, which was used for the replenishment. If the withdrawal is made to another bank card, the verification procedure for this card will be similar. The withdrawals to a card of a person who is not the owner of a personal account are prohibited.
10. Opening a trading account in a personal space, a client accepts the terms and paragraphs of this procedure, as well as confirms the complete reading the text and gives consent to the processing of personal data, the

interaction by means of telecommunications (telephone, e-mail, and other available forms of communication) in the framework of the successful implementation of this procedure.

11. In exceptional circumstances, in the case of replenishment of the trading account of a client with a third party card the account activation can be made in the prescribed manner. In this case the payer must provide the information confirming that all the financial transactions have been made with the knowledge and consent of a cardholder, who is not the owner of the trading account and is not necessarily a client of the company. To do this, the owner of the card that used for replenishment should provide a statement (or a photocopy, scanned image) with the agreement on the input of funds, with the indication of the personal passport data, as well as specifying the client name to be paid for, as well as specify the number of a trading account at BT Technologies Limited receiving the deposit of funds, as well as fill out a cardholder's verification form according to the requirements described above. Upon the receipt of the submitted documents, the company will consider the possibility to activate the client's trading account to be credited with a third-party card. At the same time, the company reserves the right to refuse the activation of a client's account and refund the money to a third party.
12. Agreement herein, which will be exchanged between the Company and the Client, in the event of contradictions in the translations of the present Agreement and Terms, priority shall be given to English.