

Privacy Policy

What personal data we collect, why, how long we keep it, who we share it with and the rights you have over it.

ISSUER	LL CAPITAL & PARTNERS LIMITED (trading as North Stone Capital)
REGULATOR	Malta Financial Services Authority (MFSA)
MBR REGISTRATION CODE	C 46015 · Authorised Person ID: LLCP
COMPANY REGISTRATION DATE	13-01-2009 · LEI code: 5493008QRPT09QVP0C32
REGISTERED OFFICE	TAGLIAFERRO BUSINESS CENTRE, LEVEL 6 Gaiety Lane SLIEMA Malta SLM 1551
VERSION / STATUS	1.1 · Effective 19 September 2025 · Issued 19 September 2025
LANGUAGE	English (language of record). Paper copies free on request: support@northstonecapital.net

This policy explains what personal data North Stone Capital collects, why we collect it, who we share it with, how long we keep it and the rights you can exercise over it. It applies to the website, your trading account, and every channel through which you deal with us.

1. Introduction

LL CAPITAL & PARTNERS LIMITED ("we", "us" or "our") operates northstonecapital.net and provides the services described on this website. This Privacy Policy explains how we collect, use, disclose and protect personal data when you visit our website, open an account, or otherwise interact with our services.

LL CAPITAL & PARTNERS LIMITED, trading as North Stone Capital, was registered in Malta on 13-01-2009 (MBR Registration Code C 46015). Authorised Person ID: LLCP. LEI Code: 5493008QRPT09QVP0C32. Registered address: TAGLIAFERRO BUSINESS CENTRE, LEVEL 6 Gaiety Lane SLIEMA Malta SLM 1551. The company is regulated by the Malta Financial Services Authority under the Investment Services Act to provide investment services.

For the purposes of data protection law, LL CAPITAL & PARTNERS LIMITED acts as controller of your personal data in respect of the website, onboarding, account relationship, shared systems and related services. We apply GDPR-grade standards as a baseline where required by applicable law.

This policy should be read together with our Cookie Policy and the Terms of Service that govern your account. If you do not agree with the way we handle personal data as described here, you should not use our services.

2. Information We Collect

We collect information you provide directly to us when you register, verify your identity, fund your account, trade or contact support. This includes identity and contact data (full name, email address, telephone number, postal address, date of birth, nationality, country of residence and tax residency), and the verification documents we are legally required to obtain before you can trade with real funds, such as a government-issued identity document, proof of address and, where used, a verification photograph processed through our identity-verification provider.

Because we are regulated financial services firms, we also collect financial and suitability information: your employment status, the source of the funds and wealth you intend to trade with, indicative income and net-worth ranges, your prior trading experience, and the payment details used to deposit to and withdraw from your account. Once your account is open, we maintain a full record of your trading activity, including orders, executions, open and closed positions, account balances, deposits and withdrawals.

When you use the website or trading platform we collect technical data automatically: IP address, device and browser type, operating system, language settings, pages viewed, timestamps, approximate location derived from your IP address, and cookie or similar identifiers as described in the Cookies and Tracking section below.

We also keep records of our communications with you, including support chats, emails and, where applicable regulation requires it, recordings of telephone conversations relating to your account or orders.

Finally, we receive information about you from third parties we are required or entitled to use: identity-verification and fraud-prevention providers, sanctions and politically-exposed-person screening services, payment service providers and, where permitted, publicly available sources. If you register but do not complete verification or fund an account, we hold only the reduced data set collected at registration, typically your name, email address and telephone number, together with technical data about your use of the website.

3. How We Use Your Information

We process personal data only where we have a legal basis to do so, and for each purpose we rely on one of the following grounds.

To perform our contract with you, we use your data to open and administer your account, verify your identity, execute and settle your orders, process deposits and withdrawals, provide the trading platform and respond to your support requests. Without this processing we cannot provide the service at all.

To comply with our legal obligations, we use your data to carry out know-your-client checks, anti-money-laundering and counter-terrorist-financing screening, sanctions checks, appropriateness assessments, transaction and regulatory reporting to the supervisory authorities of our operating entities, statutory record-keeping, and the recording of communications where the rules of the relevant regulator require it. These obligations apply across the group and cannot be waived at your request.

In our legitimate interests, we use personal data to secure the platform and detect fraud and abuse, to monitor and improve the performance of our services, to produce aggregated and de-identified analytics, and to establish, exercise or defend legal claims. Where we rely on legitimate interests we balance them against your rights, and you may object as described in the Your Rights section. With your consent, we send you direct marketing about our products and services; you can withdraw that consent at any time without affecting the lawfulness of earlier processing. North Stone Capital does not provide investment advice, and we do not use your personal data to generate personal investment recommendations. Parts of our identity-verification and fraud-screening processes are automated; where the law gives you the right to human review of a decision based solely on automated processing, you may request it via privacy@northstonecapital.net.

4. Information Sharing

We do not sell personal data. We share it only as described in this policy and under contractual or legal safeguards.

Within our business, personal data may be shared where necessary to operate shared systems, complete onboarding, provide support, administer accounts, meet compliance obligations and manage risk.

We use carefully selected service providers that process data on our behalf and only on documented instructions: identity-verification and screening providers, payment providers and banking partners, cloud hosting and IT infrastructure suppliers, communications and customer-support tools, and analytics providers. Each is contractually bound by confidentiality and security obligations consistent with this policy.

We may disclose personal data to the Malta Financial Services Authority, financial-intelligence units, tax authorities, external auditors, professional advisers, law-enforcement agencies or courts where required by applicable law, regulation or legal process, or where necessary to protect the rights, property or safety of our clients, our business or others. If we are involved in a merger, acquisition, restructuring or asset sale, personal data may transfer to the counterparty under confidentiality obligations, and we will notify you of any resulting controller change where required.

5. Data Security

We implement technical and organisational measures designed to protect personal data against unauthorised access, alteration, disclosure, loss or destruction. These include encryption of data in transit and of sensitive records at rest, role-based access controls so that staff see only the data their role requires, multi-factor authentication on internal systems, network segregation, continuous logging and monitoring, due diligence over service providers, regular staff training and documented incident-response procedures.

If a personal data breach occurs that is likely to result in a risk to your rights, we will notify the competent supervisory authority and, where the risk is high, notify you directly, in each case within the timeframes required by applicable law.

No method of transmission over the internet or of electronic storage is completely secure, and we cannot guarantee absolute security. You play a part too: keep your account credentials confidential, enable the security features we offer, and contact support@northstonecapital.net immediately if you suspect unauthorised access to your account.

6. Data Retention

We keep personal data for as long as your relationship with us lasts and afterwards for as long as we are required or permitted to keep it. The governing periods come primarily from anti-money-laundering, financial-services, tax, accounting, dispute-resolution and regulatory-recordkeeping obligations that apply to LL CAPITAL & PARTNERS LIMITED.

In practice, this means identity, account and transaction records are commonly kept for several years after account closure or the final transaction, while website analytics, support correspondence and marketing preferences may have shorter retention periods. Where a complaint, investigation, litigation hold or regulatory inquiry is open, relevant records may be retained until it is finally resolved.

When retention is no longer necessary, we delete, anonymise or securely archive the data according to our retention schedule and technical capabilities.

7. Your Rights

Depending on your country of residence and the law applicable to your relationship with LL CAPITAL & PARTNERS LIMITED, you may have rights over your personal data. Where GDPR or similar standards apply, these may include the right of access, rectification, erasure, restriction, objection, portability and withdrawal of consent.

These rights are not absolute. Financial-services, AML/CTF, tax, sanctions, fraud-prevention, legal-claims and regulatory-recordkeeping obligations may require us to keep or process certain data even where you ask us to delete or restrict it. Where we cannot comply fully, we will explain the reason unless legally prevented from doing so.

To exercise your rights, contact privacy@northstonecapital.net. We may ask you to verify your identity before acting on a request.

8. Cookies and Tracking

We use cookies and similar technologies on northstonecapital.net and the trading platform, in the four categories defined in our Cookie Policy: essential cookies that keep you signed in, maintain your session and security settings and make the platform work (these cannot be switched off); performance cookies that help us understand how the site is used so we can improve it; functional cookies that remember preferences such as your language; and targeting cookies that measure and personalise our advertising. Performance, functional and targeting cookies are set only with your consent.

When you first visit the website you are asked to choose which non-essential cookies to allow, and you can change or withdraw that choice at any time through the cookie settings on the site. You can also configure your browser to refuse or delete cookies, although blocking essential cookies may prevent parts of the platform from functioning.

Each category, and how to review the specific cookies in use through the cookie settings panel, is described in our Cookie Policy, which forms part of this Privacy Policy. Questions about cookies can be sent to privacy@northstonecapital.net.

9. Children's Privacy

Our website and services are intended for adults and are not directed at anyone under the age of 18. We do not knowingly collect personal data from minors, and our account-opening process includes mandatory date-of-birth and identity verification specifically so that a live trading account cannot be opened by anyone under 18.

If you believe that a person under 18 has provided personal data to us, contact privacy@northstonecapital.net. If we confirm that we hold data collected from a minor, we will close any associated account and delete the data, except where a law requires us to retain a record of the event.

10. International Data Transfers

LL CAPITAL & PARTNERS LIMITED is based in Malta and uses service providers that may store or process data in other countries. Your personal data may therefore be transferred to, and maintained in, jurisdictions outside your country of residence.

Where personal data is transferred internationally, we use appropriate safeguards where required, such as contractual protections, transfer-impact assessments and vendor-security reviews. We select providers based on operational need, security posture and their ability to meet applicable privacy and financial-services obligations.

By using the website and services, you acknowledge that international processing may be necessary to provide account, platform, payment, support, compliance and security functions.

11. Changes to This Privacy Policy

We review this Privacy Policy regularly and update it when our processing, our group structure or the law changes. The version published on this page is the version in force, and each update is identified by its effective date shown alongside the policy.

If we make a material change, such as processing data for a new purpose, sharing it with a new category of recipient or changing your contracting entity, we will give you advance notice by email or through a prominent notice on the website or trading platform before the change takes effect. We encourage you to review this page periodically; your continued use of our services after an updated version takes effect constitutes acknowledgement of the updated policy. Nothing in any update reduces your rights under applicable data protection law.

12. Contact Us

Questions, requests and complaints about this Privacy Policy or about how we handle your personal data should be addressed to privacy@northstonecapital.net. This mailbox is monitored by the team responsible for data protection and is the fastest way to exercise the rights described in this policy.

You can also write to us at LL CAPITAL & PARTNERS LIMITED, TAGLIAFERRO BUSINESS CENTRE, LEVEL 6 Gaiety Lane SLIEMA Malta SLM 1551. For general account or platform questions unrelated to privacy, contact support@northstonecapital.net.

If you are dissatisfied with our response to a privacy concern, you may have the right to complain to the relevant data-protection supervisory authority. We would appreciate the opportunity to resolve the matter directly first.

Questions about this document may be sent to support@northstonecapital.net or to the registered office above. The current version of every regulatory document is published at northstonecapital.net/regulatory.