

## Legal Notice & Risk Warning

**Introduction:** This website is owned, designed, and maintained by three legally established entities operating under distinct international legal frameworks. None of the entities involved are subject to any legal obligation to publish corporate disclosures ("impressum") under their respective jurisdictions. Furthermore, none of the companies target jurisdictions in which such a disclosure would be legally required.

### 1. Design & Technical Operation

The design, structure, and ongoing technical maintenance of this website are provided by a company operating under the Clevercopyfx name **Creative Financial Marketing Options (T/B DBA)**, a Delaware-registered limited liability company, doing business under this trade name. The company maintains a registered virtual office at **6249 Greenwich Dr, Tampa, FL 33647, Florida, USA**. According to Delaware law, (T/B DBA)s are not required to publish public disclosures about their internal management or officers. There is no federal or state-level law in the United States requiring a public website imprint ("impressum") outside of specific licensed industries.

### 2. Marketing Operations & Financial Content

All marketing content and financial information displayed or distributed via this website is created and operated by an independent marketing agency legally incorporated in **Saint Lucia** under the **International Business Companies Act, Cap. 12.14**. The company is doing business under the name **The Funds Holding (T/B DBA)**, and maintains a declared operational office at **#10 Manoel Street, Castries, Saint Lucia**.

This entity is not required under **Section 365(1)(a) of the Saint Lucia Companies Act (Cap. 13.01)** to publicly disclose director or ownership information. Furthermore, per a **non-objection issued by the Financial Regulatory Services Authority (FRSA) of Saint Lucia**, the company is not subject to licensing or supervision for the marketing or distribution of FX/CFD-related services or financial content, provided no client funds are handled, and no portfolio management is offered.

### 3. Product Ownership & Economic Rights

The intellectual and economic rights to the services and financial products presented on this website are held by a Marshall Islands-based business entity doing business as **Clevercopyfx FX (T/B DBA)**. This company maintains an operational office located at **1st Floor, D-Lab Village, Majuro Atoll MH96960, Republic of the Marshall Islands**.

Under the **Marshall Islands Business Corporations Act**, any non-resident domestic corporation is permitted to engage in any legal business activity not expressly prohibited. Section 5 of the Act provides that only banking, trust, and insurance services are restricted. Since FX/CFD-related services fall outside these categories and are not regulated in the jurisdiction, no license is required, and such

activities are fully legal when targeting non-residents. Furthermore, there is no requirement under Marshall Islands law for such companies to publish an online imprint ("impressum").

#### 4. Voluntary GDPR Compliance Disclaimer

This website provides a privacy policy in line with the standards of the European Union General Data Protection Regulation (GDPR) **on a voluntary basis.**

According to **Article 3(2) of Regulation (EU) 2016/679**, the GDPR applies to data controllers or processors not established in the Union only if they intentionally offer goods or services to data subjects in the Union or monitor their behavior. Since this website neither targets nor monitors EU users, the GDPR is not legally binding for its operators.

Also, the GDPR does **not** establish an obligation to publish an imprint or corporate disclosure. Such obligations, where they exist, derive solely from national laws (e.g., German TMG), which are not applicable to the entities behind this website.

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This disclosure statement is made voluntarily to support transparency and user clarity. The content of this website does not constitute legal, financial, or investment advice, and access or use by residents of regulated jurisdictions is at their own initiative and risk.

#### Risk Warning: Risk Disclosure Statement

Trading in leveraged derivative products, such as Foreign Exchange (Forex) and Contracts for Difference (CFDs), involves a high level of risk and may result in losses that exceed your initial deposit. These products may not be suitable for all investors. Leverage amplifies both potential profits and losses. When trading these instruments, you do not own or have any rights to the underlying assets. Past performance is not indicative of future results.

Before making any investment decisions, you should carefully assess your investment objectives, knowledge, experience, and financial situation. You should only engage in Forex and CFD trading if you possess sufficient knowledge and experience. STARTRADER assumes no liability for any losses incurred from trading, and all trading activities are undertaken at your own risk.

The content provided on this website is for general informational purposes only and does not take into account your individual financial circumstances, investment goals, or risk tolerance. You should review the legal documents available on our website to ensure a full understanding of the risks associated with CFD trading. If necessary, seek independent advice from qualified professionals before proceeding.

Trading Contracts for Difference (CFDs) and Foreign Exchange (FX) instruments involves substantial risk and is not suitable for all investors. The following risk statement outlines key considerations all users should be aware of before accessing information or services related to trading, investment products, or financial instruments referenced on this website.

## **1. High-Risk Nature of Trading**

CFD and FX trading is speculative, highly volatile, and involves a substantial risk of loss. It is appropriate only for individuals or entities that:

- (a) understand and accept the economic, legal, and financial risks involved;
- (b) are experienced in derivative instruments; and
- (c) are financially capable of bearing losses in excess of initial deposits or margins.

## **2. Leverage Increases Risk**

The leverage effect inherent to CFD and FX trading amplifies both gains and losses. Even a small market movement can result in significant loss, possibly exceeding your deposited margin. The greater the leverage, the greater the potential loss.

## **3. Margin Requirements**

Clients must maintain sufficient margin to support their open positions. Failure to maintain minimum margin may lead to liquidation of open positions without prior notice.

## **4. Price Volatility and Execution Risk**

Prices of CFDs and FX instruments are influenced by a wide range of market, political, and economic factors, many of which are unpredictable. Rapid fluctuations can lead to slippage, where trades execute at worse-than-expected prices, even with stop-loss orders.

## **5. No Ownership of Underlying Assets**

When trading CFDs or FX Contracts, you do not own or have rights to the underlying asset. These are derivative instruments with no entitlement to dividends, voting rights, or physical delivery.

## **6. Currency and Liquidity Risks**

If a CFD or FX contract is denominated in a currency different from your account base currency, your returns may be affected by exchange rate fluctuations. Some underlying assets may be illiquid, making it difficult to determine their true value or exit a position.

## **7. Execution Platform Limitations**

Online platforms may experience downtime, latency, or technical errors. One-click execution features do not allow order review and may lead to unintended trades. Use of demo systems is strongly encouraged before engaging in live trading environments.

## 8. No Advisory Relationship

The operators of this website and its affiliated entities do not provide investment advice or personalized recommendations. Any content, signals, or educational material is generic in nature and should not be construed as financial advice.

## 9. No Guarantees

No guarantees are provided regarding performance, profit, or avoidance of losses. Users are solely responsible for their own investment decisions and assume full liability for all outcomes.

## 10. Changes to This Statement

This risk disclosure is reviewed periodically and may be updated at any time without prior notice. Continued use of this website constitutes acceptance of any revised disclosures.

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By accessing this website and its content, you acknowledge that you have read, understood, and accept this Risk Disclosure Statement.

### **Regulatory Information: Regulatory Information**

None of the entities behind this website are subject to regulatory supervision by traditional financial authorities. However, the business activities performed fall outside the regulatory perimeter under applicable laws in the jurisdictions involved:

1. **Creative Financial Marketing Options (T/B DBA) (Delaware, USA)** does not engage in any regulated financial activity. Its responsibilities are limited to design and technical maintenance of the website, which are not subject to licensing requirements under U.S. federal or Delaware state law.
2. **The Funds Holding (T/B DBA). (Saint Lucia)**, the marketing agency responsible for producing and publishing marketing material related to FX and CFD products, points on **non-objection + legal opinion** from the **Financial Regulatory Services Authority (FRSA)** of Saint Lucia. According to **Section 12(1) of the IBC Act Cap. 12.14**, and confirmed by legal opinion, FX/CFD-related activity that does not involve custody of client funds or portfolio management is not subject to licensing. No regulatory oversight is required for marketing or affiliate activity under these laws.
3. **clevercopyfx (T/B DBA). (Marshall Islands)** is the legal rights holder and provider of the financial product structures. According to **Section 5 of the Marshall Islands Business Corporations Act**, a non-resident domestic corporation may engage in any lawful business, excluding banking, trust, and insurance services. FX/CFD services, including **copy trading** and **PAMM account technology**, are thus **fully legal and non-regulated** under Marshall Islands law. No financial license is required to offer these services to non-residents.

4. **EU Relevance & MiFID II Exemption:** In accordance with **Article 42 of MiFID II (Directive 2014/65/EU)**, all services are accessible solely via **reverse solicitation**. EU-based users access the site and its services only on their own exclusive initiative.
5. **Signal Provision (Copy Trading / Social Trading):** The copy trading functionality provided by Clevercopyfx FX (T/B DBA) falls under the legal interpretation of **signal services**, which do not require a license under EU law, as clarified by the German Federal Financial Supervisory Authority (BaFin).

**BaFin Statement on Signal Trading:** "Signalgeber geben lediglich Signale, also Kauf- oder Verkaufsempfehlungen ab. Sie führen aber keine Handelsentscheidungen für den Kunden durch. Damit ist Signaltrading grundsätzlich nicht erlaubnispflichtig."

**Source:**

[https://www.bafin.de/DE/Aufsicht/FinTech/Geschaeftsmodelle/BeratungsHandelssysteme/BeratungsHandelssysteme\\_node.html](https://www.bafin.de/DE/Aufsicht/FinTech/Geschaeftsmodelle/BeratungsHandelssysteme/BeratungsHandelssysteme_node.html)

6. **Geoblocking & Access Restrictions:** A geographic disclaimer and access barrier are presented to all visitors. By accessing the website, users acknowledge that:
  - Services are **not intended for residents** of the European Union, the United Kingdom, the United States, or Australia;
  - Services are not marketed actively in any restricted jurisdictions;
  - Users from such regions proceed at their **own initiative and risk**.

These restrictions are clearly stated via an on-site pop-up banner and terms of access agreement before proceeding.

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The entities behind this platform operate in full accordance with the legal limits and interpretations of the jurisdictions in which they are established.

### **Geographical Restrictions: Geographic Restrictions & Sanctioned Jurisdictions**

The services and information provided on this website are **not intended for use or distribution** in any jurisdiction where such activity would contravene local law or regulation. Specifically, the platform does **not provide any services or grant access** to individuals or entities who are residents, citizens, or located in the following **prohibited jurisdictions**:

- **United States** (including U.S. territories such as **American Samoa, US Virgin Islands**)
- **Canada**
- **China**

- **Afghanistan**
- **Albania**
- **Belarus**
- **Bermuda**
- **Bosnia and Herzegovina**
- **Botswana**
- **Central African Republic**
- **Crimea & Sevastopol**
- **Cuba**
- **Democratic Republic of the Congo**
- **Egypt**
- **Eritrea**
- **Former Federal Republic of Yugoslavia**
- **Guinea-Bissau**
- **Iran**
- **Iraq**
- **ISIL (Da'esh) & Al-Qaida**
- **Lebanon**
- **Libya**
- **Montenegro**
- **Myanmar**
- **North Korea**
- **Russia**
- **Serbia**
- **Sierra Leone**
- **Somalia**
- **South Sudan**
- **Sudan**
- **Syria**
- **The Taliban**

- **Tunisia**
- **Ukraine (restricted regions only)**
- **Yemen**
- **Zimbabwe**

In addition, access is restricted for users located in any country listed on the **FATF High-Risk or Non-Cooperative Jurisdictions List**, or under **major international sanctions lists**.

Services are also **not targeted** to any jurisdiction that imposes licensing requirements on activities such as affiliate marketing, FX/CFD promotion, or signal trading. However, jurisdictions **not explicitly listed above** may still access the platform if access occurs solely through **reverse solicitation** as defined under **MiFID II Article 42**, i.e., on the user's own exclusive initiative.

Clear geoblocking and a legal pop-up banner prevent access from restricted regions and inform users of the applicable terms before entry. The entities behind this platform reserve the right to enforce additional restrictions at any time in accordance with applicable compliance standards.

### **Not Liable for Third-Party Links & Passive Affiliate Marketing Statement**

This website contains references and outbound links to independent third-party trading platforms and broker websites. These are provided for informational and affiliate marketing purposes only. No contractual relationship exists between the visitor of this website and the financial service provider through the content provided herein.

The operators of this website engage exclusively in **passive affiliate marketing**, which involves placing links or banners to **licensed third-party FX and CFD brokers**. This activity is **not regulated under MiFID II**, as:

- **No financial advice, portfolio management, or client interaction** takes place;
- **No user data is collected** or processed by the website operator;
- The website does **not facilitate account opening** or transactional services;
- The user is forwarded to the broker's own regulated onboarding process.

Even though this website may receive commissions or compensation from such referrals, such compensation does **not** alter the legal nature of the activity, nor does it convert the operator into a financial service provider. This interpretation is in line with **MiFID II Article 42 (Directive 2014/65/EU)**, which clearly states:

*“Where a third-country firm provides investment services at the exclusive initiative of the client, the provisions of this Directive shall not apply to the provision of those investment services or activities by that third-country firm to that person.”*

Additionally, this position is upheld by the **ESMA Final Report on Reverse Solicitation (MiCA)** dated **17 December 2024**, which states:

*“The exemption under Article 42 must be interpreted narrowly and applies only where the initiative of the client is clear, unambiguous, and prior to any solicitation.”*

In compliance with this, no active marketing is performed to residents of jurisdictions where such activity would trigger licensing requirements.

In line with international transparency standards, the operators of this website declare that they act as a **sub-Clevercopyfx and affiliate marketing partner** to regulated brokers. This website and its legal entities do **not**:

- Offer financial services,
- Provide client-specific advice or portfolio recommendations,
- Collect, manage, or hold customer funds,
- Facilitate brokerage, custody, or investment execution.

All content is created and maintained for the sole purpose of affiliate referral. Commissions received for successful referrals are fully disclosed and represent the sole basis of commercial benefit.

This operating model is legal and compliant under:

- **MiFID II – Article 42** (Reverse Solicitation exemption),
- **ESMA Final Report on Reverse Solicitation (17 Dec 2024)**,
- **Saint Lucia IBC Act, Cap. 12.14**,
- **Marshall Islands Business Corporations Act, Section 5**, and
- **Delaware Limited Liability Company Act** (no licensing requirement for web design or affiliate-based non-financial operations).

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### Third-Party Liability Disclaimer

All external platforms referenced via links or banners on this site are operated by **independently licensed brokers**. The operators of this website have **no control or influence** over the content, operations, or legal structure of third-party platforms. Therefore, we assume **no liability** for the accuracy, legality, or reliability of external offerings.

However, we aim to maintain the highest standard of transparency and consumer protection. All referenced brokers are subject to regulation by reputable financial authorities, including but not limited to:

- **FCA** – Financial Conduct Authority (United Kingdom) – Tier 1 regulator

- **ASIC** – Australian Securities and Investments Commission – Tier 1 regulator
- **CySEC** – Cyprus Securities and Exchange Commission – ESMA & MiFID II aligned
- **DFSA** – Dubai Financial Services Authority – Tier 2
- **FSCA** – Financial Sector Conduct Authority (South Africa) – Tier 2
- **FSC Mauritius, VFSC Vanuatu, FSA Seychelles, FSC BVI** – Tier 2

Each broker provides clear regulatory disclosures and risk statements directly on their respective platforms.

The referral links on this website are not endorsements of specific services or performance guarantees. Users are urged to perform their own due diligence before engaging in any financial activity with external providers.

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### **Transparency Statement & Sub-Clevercopyfx Declaration**

In accordance with international standards for commercial transparency, we hereby declare the following:

This website and Clevercopyfx act solely as a **sub-Clevercopyfx and marketing affiliate entity** in relation to regulated third-party brokers. We are not a broker, investment firm, nor a financial service provider.

All of our operations are structured under the following legal conditions:

- We do **not offer financial services** as defined under any applicable financial regulatory framework;
- We do **not manage, handle, or accept client funds** in any form;
- We do **not collect personal financial data**, nor execute or facilitate brokerage or investment transactions;
- We do **not provide portfolio management, investment advice, or any client-specific financial service**;
- Our revenues are derived solely through disclosed **affiliate commission models** from regulated brokerage partners.

This model of operation is compliant with:

- **MiFID II (Directive 2014/65/EU), Article 42** – permitting third-country firms to provide services to EU residents exclusively at the **initiative of the client**, exempt from MiFID rules;
- **ESMA Final Report on Reverse Solicitation (17 December 2024)** – which clarifies that passive access and non-targeted information **does not constitute regulated solicitation**;

- **IBC Act Cap. 12.14 of Saint Lucia** – which does **not require licensing** for marketing or non-fund-holding financial content provision;
- **Marshall Islands Business Corporations Act, Section 5** – which **permits any lawful business activity** not expressly restricted, such as FX/CFD software licensing, copy trading, or distribution support;
- **Delaware Limited Liability Company Act** – which imposes no licensing for web or design services.

We emphasize that the nature of our involvement is informational, editorial, and promotional in the affiliate sense, not advisory or transactional. As such, visitors of this website understand and agree that all engagements with financial services, if initiated, occur solely via the respective, independently regulated broker platforms.

## Contact Directory

In the interest of open and structured communication, we provide the following dedicated contact channels. These are designed to streamline inquiries and ensure appropriate routing of communications by topic or institutional type:

- **info@clevercopyfx.com** – General inquiries, press, and Clevercopyfx-related requests
- **data-privacy@ clevercopyfx.com** – Questions regarding privacy policy, data rights, or GDPR-related matters
- **terms@ clevercopyfx.com** – Requests or feedback related to Terms of Use, disclaimers, or user obligations
- **compliance@ clevercopyfx.com** – Regulatory notifications, procedural concerns, or internal policy inquiries
- **regulator@ clevercopyfx.com** – Official communications from financial authorities or oversight bodies
- **government@ clevercopyfx.com** – Requests from national or international government agencies
- **partnerships@ clevercopyfx.com** – Collaboration, affiliate, or strategic partner inquiries
- **client@ clevercopyfx.com** – Visitor or user support inquiries related to content or platform access

All emails will be routed securely to the designated team. Please allow 2–4 business days for a formal response depending on the nature and volume of the request.

## Content Responsibility & Product Disclosure

This website is operated as an information platform by The Funds Holding (T/B DBA), a legally incorporated marketing agency under the laws of Saint Lucia. All references to product offerings, financial technologies, or brokerage services presented on this website are based on the data, materials, and disclosures provided by the product owner and principal operator, **Clever Copy FX (T/B DBA)**, a company acting as Clevercopyfx name registered under the laws of the Republic of the Marshall Islands.

**The Funds Holding (T/B DBA)**, does not act as issuer or provider of any financial product or trading service. It does not assume any legal or operational responsibility for the accuracy, effectiveness, legality, or suitability of any third-party service or investment solution referenced. The marketing agency's role is limited to content creation, editorial preparation, and Clevercopyfx visibility in the form of affiliate and informational media.

**Clever Copy FX (T/B DBA)**, remains the exclusive provider of the underlying product frameworks and assumes all content and legal responsibility related to the tools, structures, and financial service integrations displayed or discussed herein. Any engagement, transaction, or inquiry related to the actual use of the product(s) should be directed to the relevant parties within Clevercopyfx FX (T/B DBA), or their licensed partners.

This clarification is issued to ensure transparency and delineation of responsibilities between Clevercopyfx, platform, and service providers. The website does not create or imply a regulated activity or direct financial relationship between users and The Funds Holding (T/B DBA), and is to be viewed strictly as a neutral interface for passive information delivery and traffic routing.

For additional legal and compliance documents related to Clevercopyfx FX (T/B DBA), please visit: <https://thefundsholding.com/legal>

### **Verification & Regulatory Affiliation Transparency**

The affiliate marketing activities conducted via this website and associated with The Funds Holding, and Clevercopyfx, are fully verifiable and are aligned with international transparency standards. While the website does not provide regulated financial services, it does promote and refer users to fully licensed and regulated third-party brokerage providers.

For verification purposes, users, institutions, and authorities may independently confirm that the following affiliated brokerages are fully regulated under the respective financial supervisory bodies in their jurisdictions:

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**STARTRADER Group of Entities**

- **STARTRADER Limited** – Regulated by the **Financial Services Authority (FSA) Seychelles**
  - License No.: SD049
  - Registration No.: 8427362-1
  - Address: Suite 3, Global Village, Jivan's Complex, Mont Fleuri, Mahe, Seychelles
- **STARTRADER Financial Markets Limited** – Regulated by the **Financial Services Commission (FSC) Mauritius**
  - License No.: GB24203371
  - Company No.: 212229 GBC
  - Address: Suite 201, 2nd Floor, The Catalyst, 40 Silicon Avenue, Ebene Cybercity, Mauritius

Additional STARTRADER Licenses:

- UK (FCA) Reference Number: 821704
- UAE (SCA) License No.: 20200000241
- South Africa (FSCA) License No.: 52464
- Australia (ASIC) License No.: 421210

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## PU Prime Group of Entities

- **PU Prime Limited** – Regulated by **FSA Seychelles**
  - License No.: SD050
  - Address: CT House, Office 9A, Providence, Mahe, Seychelles
- **PU Prime Ltd** – Regulated by **FSC Mauritius**
  - License No.: GB23202672
  - Address: Suite 201, Level 2, The Catalyst, Cybercity Ebene, Mauritius
- **PU Prime (Pty) Ltd** – Regulated by **FSCA South Africa**
  - FSP No.: 52218
  - Address: 37 Harley Street, Ferndale, Randburg, Gauteng 2194, South Africa
- **PU Prime Trading Pty Ltd** – Regulated by **ASIC Australia**
  - License No.: 410681

- Address: Suite 103, Level 1, 17 Castlereagh St, Sydney, NSW 2000, Australia
- **Finzero Cap Ltd.** – Registered payment agent (Cyprus)
  - Registration No.: HE414308
  - Address: Archiepiskopou Makariou III, 160-1st floor, 3026, Limassol, Cyprus

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## **VANTAGE Group of Entities**

- **Vantage Global Prime LLP** – Regulated by **FCA UK**
  - Registration No.: OC376560
  - Address: 7 Bell Yard, London, WC2A 2JR, United Kingdom
- **Vantage FX Pty Ltd** – Corporate Authorized Representative of Vantage Global Prime Pty Ltd
  - AFS Rep No.: 343547
  - Address: 12/15 Castlereagh Street, Sydney, NSW 2000, Australia
- **Vantage Markets (Pty) Ltd** – Regulated by **FSCA South Africa**
  - License No.: 51268
  - Address: Unit 11, 31 First Avenue East, Parktown North, Johannesburg, Gauteng, 2193
- **Vantage Global Prime Pty Ltd** – Regulated by **ASIC Australia**
  - AFSL No.: 428901
  - Address: Level 29, 31 Market St, Sydney, New South Wales, 2000, Australia
- **Vantage International Holding Limited** – Incorporated in Seychelles
  - Registration No.: 171730
  - Address: Suite 23, 1st Floor, Eden Plaza, Eden Island, Mahe, Republic of Seychelles

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These regulatory references demonstrate that while The Funds Holding. and Clevercopyfx. do not themselves offer regulated investment services, the brokers to whom clients are referred are fully authorized, licensed, and regulated in line with global compliance standards.

For transparency and compliance assurance, the affiliate relationship with the following brokers can be **independently verified** by regulatory bodies upon request using the designated **Reference IDs**:

- **PU Prime (Mauritius)** — Reference Verification ID: **38194**
- **Vantage (Mauritius)** — Reference Verification ID: **50789**
- **STARTRADER (Seychelles)** — Reference Verification ID: **36074**

Requests for verification require **no further personal or business details**, and may be used to confirm whether The Funds Holding Ltd. or Clevercopyfx Ltd. are recognized contractual partners under the relevant affiliate programs.

Should you require documentation or confirmation of the affiliate relationship for institutional or regulatory purposes, please contact:

**[compliance@thefundsholding.com](mailto:compliance@thefundsholding.com)**