

Last update: 22 December 2022

AML and KYC Compliance Policy Declarations of Seven Golden Gates Payment Services Provider L.L.C.

General

Thank you for visiting <https://www.7goldengates.com/> ("**Site**", "**Platform**"). The Site is owned and operated by Seven Golden Gates Payment Services Provider L.L.C., duly incorporated and existing under the laws of the United Arab Emirates, with the registered office at: City Walk, Dubai, Happiness Street Building 2A, office G06, and its affiliates, (together "**Seven Golden Gates**", "**we**", "**our**", or "**us**").

The following Anti-Money Laundering and Know Your Customer Compliance Policy Declarations ("**AML and KYC Policy**") supplements and is a part of our Terms of Service (which can be found at www.7goldengates.com) ("**Terms of Service**"), as well as any other policies published on the Site that are incorporated by reference hereto, and is designed to prevent and mitigate any risks of Seven Golden Gates Payment Services Provider L.L.C. being involved in any kind of unlawful activities, as well as to combat such activities. Definitions that are not capitalized herein have the meaning set out in our Terms of Service and Privacy Policy.

BY AGREEING TO AML AND KYC POLICY, YOU ENTER INTO A LEGALLY BINDING CONTRACT BETWEEN YOU AND SEVEN GOLDEN GATES PAYMENT SERVICES PROVIDER L.L.C. PLEASE READ CAREFULLY BEFORE PROCEEDING WITH USING THIS SITE. PLEASE BE ADVISED THAT WE RESERVE THE RIGHT TO CHANGE AML AND KYC POLICY FROM TIME TO TIME WITHOUT PRIOR NOTICE. YOU SHOULD REVIEW AML AND KYC POLICY REGULARLY. IF YOU DISAGREE WITH THE MODIFICATIONS TO AML AND KYC POLICY, YOU SHOULD STOP USING THE SITE IMMEDIATELY. BY CONTINUING TO USE THE SITE, YOU AGREE TO THE MODIFICATIONS AUTOMATICALLY.

1. Verification of Users

We conduct verification of our Users to identify persons engaged in Money Laundering, Terrorism Financing, corruption, bribery, drug and human trafficking, proliferation of weapons and other illegal activities.

We have established the following verification procedures that strive to meet worldwide requirements and standards, and implemented the following systems and controls to comply with the international AML/KYC/CTF legislation.

1.1. *Identity verification*

We may collect the following information from an individual.

- 1) your name;
- 2) your photographic identification;
- 3) details from your identity documents (such as driver license, passport), number of the document, date of issue and expiration, photographic identification, address etc. Please note that we may ask you to provide us with your personal photograph with an ID in hand for verification purposes, as well as a copy (front and back) of your ID;
- 4) your address. Please note that the following proof of address may be accepted: a copy of a utility bill, telephone bill or bank statement;

- 5) your phone number;
- 6) your e-mail address;
- 7) your IP address, Browser and Operating System information, geolocation details;
- 8) your banking details including account numbers and payment card data;
- 9) your date of birth;
- 10) your employment details;
- 11) information about sources of your funds.

We may collect the following information from a legal entity.

- 1) name of a legal entity;
- 2) authorized representative (please note that we will conduct a separate KYC procedure for an authorized representative);
- 3) government-issued business registration number or tax identification number and country of incorporation;
- 4) copy of a trade register extract or a similar document;
- 5) legal and mailing address;
- 6) description of business activities;
- 7) wallet address.

To get verified please visit the Verification section on your Account. The verification process will take up to 2 weeks upon your upload of all necessary identification information. You will be notified about the results of your verification process via email.

PLEASE BE ADVISED THAT WE ALWAYS RESERVE THE RIGHT TO REQUIRE ANY ADDITIONAL DOCUMENTS FROM YOU TO CONDUCT VERIFICATION PROCESS. WE WILL KEEP YOUR IDENTIFICATION INFORMATION AND TRANSACTIONS DATA FOR A MINIMUM OF 5 (FIVE) YEARS.

PLEASE ALSO NOTE THAT YOU WILL NOT NEED TO BE VERIFIED TO REGISTER AN ACCOUNT, USE OUR SITE AND DEPOSIT THE DIGITAL TOKENS, UNLESS YOU ARE WILLING TO WITHDRAW YOUR DIGITAL TOKENS.

2. Eligibility of the Users

Please be advised that we explicitly prohibit persons defined as Persons from Prohibited Jurisdictions, in accordance with our Terms of Service from using our Platform. All actions conducted by such Persons from Prohibited Jurisdictions on our Platform will be deemed invalid. We shall not be held liable for any actions of the Persons from Prohibited Jurisdictions on our Site.

3. AML Screening

To conduct the verification process, we will conduct the following screening process for each prospective User to identify whether they fall under certain categories of unwanted persons.

3.1. Sanctions

We screen a prospective User to identify whether you fall under certain sanctions lists. They include Office of Foreign Assets Control (OFAC) of the US Department of Treasury Sanctions List, Her Majesty's Treasury (HMT) Sanctions List, United Nations (UN) Sanctions List, Countering America's Adversaries Through Sanctions Act (CAATSA) Sanctions List, European

Union (EU) Consolidated Financial Sanctions List, Australian Government Department of Foreign Affairs and Trade (DFAT) Consolidated List, and Financial Action Task Force (FATF) Sanctions List among other applicable lists.

3.2. *Politically Exposed Persons*

We screen a prospective User to identify whether you fall under the definition of a domestic and/or foreign Politically Exposed Person (“**PEP**”), Relative & Close Associate (“**RCA**”), and/or Head of International Organization (“**HIO**”).

According to FATF Guidance on Politically Exposed Persons (Recommendations 12 and 22), PEP shall be defined as an individual who is or has been entrusted with a prominent public function. The position of PEP can be potentially abused for the purpose of committing Money Laundering, corruption, bribery, Terrorism Financing, and related unlawful actions. By screening our prospective Users, we implement a risk-based management system to detect such potential abuse if and when it occurs. Besides, we will also screen our prospective Users to identify whether they fall under the category of a “close associate” of a PEP, or are their family member and, therefore, constitute high risk.

3.3. *Adverse Media*

We screen adverse media searching for any negative mentions of our prospective User in various publicly available resources.

Please be advised that any prospective User who has been matched according to the Sanctions, PEP and/or Adverse Media screening, will be red-flagged for further additional KYC process. We reserve our right to require additional verification from you and conduct investigation to verify you as our User. We also reserve our right to conduct AML screening of our verified Users on a regular basis and request up-to-date and/or additional identification from you.

4. Transaction Monitoring

Please note that we reserve our right to monitor your transactions as a part of our risk-based management system. Transaction monitoring requires constant check of the transactions conducted on your Account to identify possible risks and deviations from usual activities. We may collect, filter, investigate and report data related to your transactions and reserve our right to suspend or terminate your Account if we reasonably suspect you to be possibly engaged in suspicious and/or unlawful behaviour. We also reserve our right to report such unlawful behaviour to the law enforcement agencies for further investigation.

5. Risk-based management system

We have developed and implemented a risk-based management system to ensure that Seven Golden Gates conducts business in strict compliance with AML/CTF legislation, and that the greatest risk receive the highest attention. We conduct all necessary preliminary monitoring to identify risks prior to the commencement of a relationship between Seven Golden Gates and you and prior to any transactions you may conduct on our Site.

6. Compliance Representative

Please be advised that our compliance representative is a hired legal entity KYCAID LIMITED, registered at: 71-75 Shelton Street, Covent Garden, London, England, WC2H 9JQ, using the API

services on <https://api.kycaid.com>, duly authorized by Seven Golden Gates, whose duty is to ensure the effective implementation and enforcement of the AML/KYC Policy. All data is stored on remote servers in Belgium. The conditions of processing the data are indicated on <https://www.kycaid.com/terms-and-conditions>

Our compliance representative is authorized to conduct the following actions.

- 1) act as a Money Laundering Reporting Officer (MLRO) to oversee compliance with the AML/CTF legislation and best practices in the industry;
- 2) conduct Customer Due Diligence (CDD), collect, process and verify identification information of the Users and/or prospective Users;
- 3) develop and implement internal AML/KYC policies and procedures;
- 4) monitor transactions and investigate dubious and high-risk behaviour;
- 5) develop and implement a risk-based management system;
- 6) provide Seven Golden Gates's employees with necessary trainings to ensure they are acting in strict compliance with the AML/CTF legislation;
- 7) prepare annual AML audit reports of Seven Golden Gates;
- 8) communicate with the state and law enforcement agencies to ensure Seven Golden Gates's compliance with the AML/KYC/CTF legislation.