

AML/KYC Policy

November 01, 2024

Introduction

The Anti-Money Laundering and Know Your Customer Policy (referred to as the “AML/KYC Policy”) of CardLinkPro LLC is designed to identify and minimize risks associated with potential illegal activities. Compliance with both international and local regulations necessitates that CardLinkPro LLC establish effective internal protocols and mechanisms aimed at preventing money laundering, terrorist financing, human and drug trafficking, the proliferation of weapons of mass destruction, as well as corruption and bribery. The policy also outlines actions to be taken in response to any suspicious activities by users. Key components of the AML/KYC Policy include: Verification Procedures, Screening of Sanctions and PEP Lists, Compliance Officer Designation, Transaction Monitoring, and Risk Assessment.

Verification Procedures

A fundamental aspect of preventing illegal activities is Customer Due Diligence (CDD). In line with CDD, CardLinkPro LLC has developed its own verification procedures that adhere to anti-money laundering and “Know Your Customer” standards. The identity verification process requires users to submit reliable documents or information from independent sources (such as national IDs, international passports, bank statements, or utility bills). To facilitate this, CardLinkPro LLC reserves the right to collect identification information for AML/KYC purposes. The company will take necessary measures to authenticate the documents and information submitted by users. All lawful methods will be employed for cross-verifying identification details, and CardLinkPro LLC retains the right to investigate users deemed risky or suspicious. Continuous verification of a user’s identity may occur, particularly if their identification information changes or if their activity raises concerns. Additionally, CardLinkPro LLC may request updated documentation from users even if they have previously completed the verification process. Users’ identification information will be collected, stored, shared, and safeguarded in strict accordance with CardLinkPro LLC’s Privacy Policy and applicable regulations. The identity verification process consists of the following steps: Automated ID Verification, Facial Recognition, and Synchronization with National Government Registries.

Automated ID Verification

The identity verification software automatically identifies, verifies, and extracts information from over 3,000 types of identity documents from more than 190 countries. This includes passports, ID cards, driving licenses, and residence permits, ensuring efficient and accurate analysis on a global scale.

Facial Recognition and 3D Liveness Detection

Advanced biometric algorithms ensure that analyzed faces are genuine, preventing the use of photographs, 3D masks, or other fraudulent representations during the verification process. Three-dimensional facial mapping can serve as a robust method for user authentication.

Synchronization with National Government Registries

The identity verification software cross-references information obtained from ID documents with government databases in over 70 countries, adding an additional layer of security. Once a user's identity is successfully verified, CardLinkPro LLC can mitigate potential legal liabilities if its services are misused for illegal purposes.

Card Verification

Users intending to utilize payment cards in connection with CardLinkPro LLC's services must complete card verification according to the instructions provided on CardLinkPro LLC's website.

Strictly Prohibited Activities and Rights of CardLinkPro Pro

1. Prohibition on Access Transfer

Users are strictly prohibited from passing access to their personal accounts to any third party.

2. Prohibited Activities

The following activities are strictly forbidden on the CardLinkPro Pro platform:

- **Money Laundering:** Engaging in any actions aimed at concealing the origins of illegally obtained funds.
- **Financing Terrorism:** This includes transferring funds to terrorist organizations or supporting their activities in any form.

- **Fraudulent Activities:** Engaging in phishing, credit card fraud, fraudulent schemes, or any other illegal activities aimed at unlawfully obtaining funds.
- **Drug Trafficking:** Any involvement in the purchase or sale of illegal drugs is strictly prohibited.
- **Arms Trafficking:** Engaging in the purchase or sale of weapons is not allowed.
- **Cryptocurrency Exchange Services:** Providing cryptocurrency exchange services for third parties is forbidden.
- **Fiat Currency Exchange Services:** Offering fiat currency exchange services for third parties is prohibited.
- **Business Settlements Deviating from Regulations:** Any activity that deviates from the established policies and rules of CardLinkPro Pro is not allowed.

3. Freezing User Balances

In the event of suspicious transactions, CardLinkPro Pro reserves the right to freeze the User's balance until further investigation.

4. Information Requests

CardLinkPro Pro is entitled to request necessary information and documents from any User, including video verification. Users are obligated to provide all requested information promptly and accurately.

5. Funding User Accounts

Users must only use bank cards that are registered in their name to replenish their personal accounts on CardLinkPro Pro. Compliance with this requirement is essential for continued access to services.

6. KYC Compliance

All Users are required to provide complete and accurate information during Know Your Customer (KYC) procedures to ensure compliance with regulatory standards.

By adhering to these guidelines, Users contribute to a secure and compliant environment on the CardLinkPro Pro platform.

Screening for Sanctions and Politically Exposed Persons (PEPs)

CardLinkPro LLC conducts thorough screenings of applicants against recognized Sanctions and PEP lists. This process applies to both individuals and entities and occurs at various stages: during onboarding when users submit their applications, manually by a Compliance Officer in response to anti-fraud and AML alerts, and monthly through automated scripts that re-evaluate the entire customer database. The screening process encompasses the following steps:

Monitoring International Sanctions Lists

The International Sanctions Lists include several key databases, such as:

- OFAC-SDN
- FSE (OFAC Consolidated: FSE, SSI, Palestinians, Non-SON)
- OICV-IOSCO
- World Bank
- United Nations Consolidated Sanctions List
- United Nations Development SECO – Sanctions & Embargos
- United Kingdom HM Treasury Consolidated List
- Consolidated Register of Frozen Assets (aligned with UN)
- European Union Consolidated Sanctions List
- Central Bank of the Russian Federation
- Rosfin Monitoring Russia
- Interpol

Monitoring Law Enforcement Watchlists:

Law enforcement watchlists include databases such as:

- Europol: Europe's Most Wanted
- National Crime Agency (UK) Most Wanted
- FBI
- U.S. Food & Drug Administration
- Financial Crime Enforcement Network – 311 Special Measures

Role of the Compliance Officer

The Compliance Officer, appointed by CardLinkPro LLC, is responsible for ensuring the effective implementation and adherence to the AML/KYC Policy. Their duties encompass all aspects of anti-money laundering and counter-terrorist financing efforts, including but not limited to:

- Collecting identification information from users.
- Establishing and updating internal policies and procedures for the preparation, review, submission, and retention of all necessary reports and records in compliance with applicable laws.
- Monitoring transactions and investigating any significant anomalies in activity.
- Implementing a records management system for the proper storage and retrieval of documents, files, forms, and logs.
- Regularly updating risk assessments.
- Providing law enforcement with information as required by law.

The Compliance Officer is authorized to engage with law enforcement agencies involved in preventing money laundering, terrorist financing, and other illegal activities.

Transaction Monitoring

At CardLinkPro LLC, understanding Users extends beyond identity verification (who they are) to a critical analysis of their transaction behaviors (what they do). Consequently, we utilize data analysis as a vital tool for risk assessment and detecting suspicious activities. Our compliance efforts encompass various tasks such as data collection, filtering, record maintenance, investigation oversight, and reporting. Key functionalities of our system include:

- Daily checks of Users against recognized “blacklists” (e.g., OFAC).
- Aggregation of transaction data across multiple parameters.
- Placement of Users on watch lists and service denial lists.
- Initiation of investigations when necessary.
- Internal communications and completion of statutory reports as required.
- Management of cases and documentation.

Our fully automated transaction monitoring tools are designed to detect illicit activities often associated with “dirty” money, including money laundering, terrorist financing, drug and human trafficking, the proliferation of weapons of mass destruction, corruption, and bribery. These tools allow us to take prompt action in response to any suspicious activities from Users. The transaction monitoring software automatically analyzes incoming and outgoing data.

In accordance with our AML/KYC Policy, CardLinkPro LLC will monitor all transactions and reserves the right to:

- Report suspicious transactions to the appropriate law enforcement agencies through the Compliance Officer.
- Request additional information and documentation from Users if their transactions raise suspicion.
- Suspend or terminate a User’s account if there is reasonable suspicion of illegal activity.

This list is not exhaustive; the Compliance Officer will continuously monitor User transactions to determine whether they should be flagged as suspicious or recognized as legitimate.

Risk Assessment

In alignment with international standards, CardLinkPro LLC employs a risk-based approach to combat money laundering and terrorist financing. This strategy ensures that our preventive measures are proportionate to the identified risks, allowing for more efficient allocation of resources. The guiding principle is to direct resources according to priorities, ensuring that the highest risks receive the most attention.

For any inquiries, please reach out to us at: compliance@cardlinkpro.com