

## HONOS OÜ KNOW YOUR CUSTOMER (KYC) REQUIREMENTS

04/10/2019

### 1. Company, field of activity, activity licenses.

1.1.Name of the company: HONOS OÜ

1.2.Registry code: 14656968

1.3.Address: Lõõtsa str 2B, Tallinn, Republic of Estonia 11415

1.4.E-mail: [info@honos.pro](mailto:info@honos.pro)

1.5.Fields of activity and licenses:

1.5.1. Virtual Currency Exchange Service, license FVR000714 issued by the Police and Border Guard Board of the Republic of Estonia on 15/02/2019

1.5.2. Virtual Currency Wallet Service, license FRK000621, issued by the Police and Border Guard Board of the Republic of Estonia on 15/02/2019

1.5.3. Currency Exchange Service, license FVR000714 issued by the Police and Border Guard Board of the Republic of Estonia on 20/02/2019

### 2. Know your customer obligation (hereinafter KYC)

2.1.As a company providing financial services in the Republic of Estonia, HONOS OÜ is obliged to identify, collect and control customer data, store such data and update it regularly for the provision of services in the framework of its economic activities in accordance with the Money Laundering and Terrorist Financing Prevention Act and other legislation in force in the Republic of Estonia and the European Union. For corporate customers, it is mandatory to identify the actual beneficiaries of the companies and the content of its economic activities. Pursuant to its legal obligations, Honos OÜ has to check whether the customers are added to the lists of international sanctions and identify the clients' PEP status (politically exposed person, his or her family member or a close associate).

2.2.According to the Estonian-US intergovernmental agreement, based on the US Foreign Account Tax Compliance Act or FATCA, Estonia undertakes to provide information to the US on US taxpayers located in Estonia (US citizens and residents for tax purposes; people who have the right to move to the US at any time (possessors of green card), US-registered companies, etc.). Although HONOS OÜ is not a financial institution accountable within the meaning of the Tax Information Exchange Act for the purpose of fulfilling the FATCA agreement in Estonia, HONOS OÜ is obliged to forward the data collected on people who have to pay their taxes in the US upon receipt of a relevant request.

### 3. Data subject to processing

- 3.1. For the performance of legal obligations and the protection of the Customers' and its own rights, HONOS OÜ collects and processes customer identification data (name and other personal data, contact information, documents used for verification), transaction data (bank transfers, card payments, transactions executed on the platform), data about concluded agreements and data collected during communication with the helpline, as well as data related to the location of the Customer (country, region, address) and the related legal persons (business) and tax residence data (country of residence, taxpayer identification number and country, citizenship), information about the origin of the Customer's assets or transactions (business partners, field of activity, connection with public authority or persons with PEP status etc.), and data collected from third parties (public registers). Such data is used to comply with statutory due diligence measures, in particular for the purpose of complying with the Money Laundering and Terrorist Financing Prevention Act (Money Laundering and Terrorist Financing Prevention Act / AML) and in order to ensure the compliance of transactions with restrictions laid down by international sanctions.
- 3.2. The data collected by HONOS OÜ regarding customers and their transactions are confidential and will be communicated to third parties only on the basis and to the extent provided by law. Upon receipt of a request for information, HONOS OÜ shall verify its legal basis. Customer data is also provided to partners involved in providing the service (banks, payment institutions, verification service providers) to the extent necessary to provide the service.
- 3.3. Customer data is collected through the creation of a customer account in the exchange platform form, during verification procedure, and upon requests for additional data for the fulfilment of enhanced control requirements in the performance of due diligence measures laid down by the Money Laundering and Terrorist Financing Act.
- 3.4. When creating a HONOS OÜ customer account, the Customer must submit the following information in the exchange platform form or during the verification procedure depending on his status:
  - 3.4.1. **Resident of Estonia who is a natural person:** first and last name; personal identification code; name, number, date of issue of the identity document, name of the issuer; residential address; contact phone number; e-mail address; profession or occupation; copy of the travel document image page; PEP status (whether it is a person with the PEP status, his or her family member or a close associate of this person).
  - 3.4.2. **Legal person who is the resident of Estonia:** the name and registry code of the legal person; postal address; contact phone number; e-mail address; field of activity; first and last name, personal identification code or date of birth of the representative; the basis for the right of representation, in the case of an authorised person, a notarised authorisation; actual beneficiaries' data; PEP status of the Company's

related persons (whether it is a person with the PEP status, his or her family member or a close associate of this person).

- 3.4.3. **Natural person who is not the resident of Estonia:** first and last name; personal identification code, date of birth and place of birth; name, number, date of issue of the travel document, name of the issuer; residential address and postal address; contact phone number; e-mail address; occupation or profession; copy of the travel document image page, where applicable, the visa or temporary residence permit; PEP status (whether it is a person with the PEP status, his or her family member or a close associate of this person).
- 3.4.4. **Non-resident of Estonia who is a legal person:** the name and registry code of the legal person; time of registration; business form; country of location; postal address; contact phone number; e-mail address; web address; business address; field of activity and activity licenses, if any; VAT number; LEI code; details of the bank account(s); data of subsidiaries and/or affiliates; company's economic indicators and business relationships information; first and last name, personal identification code and date of birth of the representative; the basis of the right of representation, a document certifying the right of representation in the case of an authorised person, certified by a notary or apostille (the aforementioned documents must be sent by post); full details of actual beneficiaries; PEP status of the Company's related persons (whether it is a person with the PEP status, his or her family member or a close associate of this person); the name and web address of the business or economic activities' register of the country of location; additional documents: up-to-date printouts of business or economic activities' registers, tax authority's certificates in case of CIS and offshore countries; the foundation resolution of the company; resolution of the management board to carry out transactions with virtual currencies; AML documents (money laundering and terrorist financing prevention documents); copy of the utility bill confirming the business address.

#### 4. **Enhanced controls for checking the implementation of due diligence measures**

- 4.1. For transactions exceeding 15,000 euros (or the equivalent amount in other currencies, including virtual currencies) or that are unusual, as well as in case of the need for enhanced Customer check, HONOS OÜ may require additional information from the customer (statement of transaction; origin of the funds and resources used in transactions; certified statement of the customer's bank account; utility bills from the place of residence or the place of business; additional document identifying the person; other data).
- 4.2. The collection and transmission of additional data as part of the enhanced control shall take place by verified e-mail or mail.

#### 5. **Storage of customer and transaction data**

- 5.1. The data of the Customer and his/her representatives as well as copies of the documents submitted during the business relationship shall be digitally stored in the computer system (server) of HONOS OÜ or on paper for 5 years after the termination of contractual relations with the customer.
- 5.2. Customer transaction data is stored digitally on HONOS OÜ computer system (server) or on paper for 7 years from the end of the financial year's last transaction.