

# KYC/CDD Procedures

Ram Fintech s.r.o. · Draft for EMI licensing

Customer Identification and Due Diligence Procedures (KYC/CDD Procedures)

Company: Ram Fintech s.r.o. Version: 1.0 (Public Disclosure)

Date: [Enter date]

Legal basis: Act No. 253/2008 Coll. and CNB Decree No. 67/2018 Coll.

## 1. Introduction

To ensure the security of the financial system and protect our clients, Ram Fintech s.r.o. implements strict "Know Your Customer" (KYC) procedures and thorough Customer Due Diligence (CDD) checks. These procedures are designed to prevent the misuse of our services for the purpose of laundering proceeds from criminal activity.

## 2. Digital Identification (Onboarding)

The onboarding of new clients is conducted entirely online via our app or web interface. The process involves the following steps:

### 2.1. Verification of identification documents

The client is required to provide a scan or photograph of valid identification documents (ID card, passport, or residence permit for foreign nationals).

Our systems use OCR technology to automatically validate a document's security features and check its validity.

### 2.2. Biometric Verification (Liveness Check)

To mitigate the risk of identity theft, we use advanced biometric verification methods:

**Liveness Check:** The user is prompted to take a selfie or a short video in real time. The system analyzes micro-movements and image depth to confirm that the user is a real person, not a static photo, a mask, or a deepfake video.

**Face Matching:** Biometric data from the liveness test is compared with the photograph on the presented ID document.

## 3. Client Screening

Every client is screened against global databases before their account is approved:

**Sanctions Lists:** Screening against OFAC, EU, and UN lists, as well as the Czech Republic's national sanctions list.

**Politically Exposed Persons (PEPs):** Identification of persons with significant public influence who are subject to enhanced due diligence.

**Adverse Media:** Monitoring negative information in public sources.

#### 4. Risk Assessment (Risk-Based Approach)

Based on the information we gather (geographical origin, nature of business, expected transaction volumes), we assign a risk profile to each client:

Low risk: Standard control procedures.

High risk: Requires documentation of the source of wealth and the source of funds, as well as approval by an AML officer.

#### 5. Corporate Clients (KYB – Know Your Business)

For legal entities, we verify:

Proof of the company's legal existence (extract from the Commercial Register).

Ownership structure and identification of ultimate beneficial owners (UBOs).

The nature of the business and the nature of the planned transactions.

#### 6. Ongoing monitoring

The KYC process does not end with the opening of an account. The company performs the following:

Regular updates to client data.

Monitoring transactions to detect unusual patterns of behavior.

Periodic reassessment of the risk profile.

#### 7. Privacy Policy

All data collected as part of the KYC/CDD processes is processed in accordance with the GDPR and stored in a secure AWS cloud environment within the EU. Only authorized Compliance Department staff have access to this data.

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