



BITINTERPAY
BITCOIN EXCHANGE

BITINTERPAY OU AML / KYC POLICY

The Anti-Money Laundering Policy and the Know Your Customer Policy (hereinafter AML / KYC Policy) are designed to prevent and reduce the possible risks of using BITINTERPAY for the laundering of illegally acquired funds and the financing of terrorism.

In accordance with the Money Laundering and Terrorist Financing Prevention Act, BITINTERPAY applies procedures and mechanisms to prevent money laundering, financing of terrorism, other illegal activities and responding to any form of suspicious activity on the part of its Users.

The AML / KYC policy includes a Verification procedure, the presence of an AML / KYC compliance officer, the Monitoring of Transactions, the Application of Due Diligence norms, and the Risk Assessment.

One of the international standards for preventing illegal activities is proper customer verification. To this end, BITINTERPAY implements verification procedures in the anti-money laundering and anti-money laundering standards and the procedure approved by the Money Laundering and Terrorist Financing Prevention Act.

Identity identification procedure BITINTERPAY is a request addressed to the User about providing BITINTERPAY with reliable, independent source documents, data or information (for example, User ID, bank statement, international passport).

BITINTERPAY reserves the right to collect the User's identification information for the purposes of AML / KYC Policy compliance and stores it according to the Privacy Policy.

BITINTERPAY initiates authentication of documents and information provided by Users. Double verification of identification information will be used, and BITINTERPAY has the right to investigate the cases of certain Users whose personalities were in the opinion of the company identified as a client with an average or high risk of laundering illegally acquired funds and financing terrorism.

BITINTERPAY has the right to check the identity of the User on an ongoing basis, and immediately if its identity information has been changed or its activity has appeared suspicious (unusual for a particular User in the opinion of the company). BITINTERPAY has the right to request from the Users the current documents, even if it passes authentication earlier.

Information about the user's identification will be collected, stored, shared and protected strictly in accordance with the BITINTERPAY Privacy Policy and relevant rules.

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Users who intend to use payment cards for the purpose of consuming services must undergo a card check in accordance with the requirements of the BITINTERPAY administration.

The official responsible for AML compliance is a person duly authorized by BITINTERPAY, whose responsibility is to ensure the effective implementation and enforcement of AML / KYC policies. The duty of such an official is to control all aspects of BITINTERPAY's activities in counteracting the legalization of proceeds from crime, including money laundering and terrorist financing, including but not limited to the following methods:

- Collection of user identification information;
- Implementation of records management system for appropriate storage and retrieval of documents, files, forms and logs;
- Regular updating of the risk assessment;
- Providing law enforcement authorities with the information required in accordance with applicable laws and regulations;
- Establish and update internal policies and procedures for the completion, review, submission and storage of all reports and records required by applicable laws and regulations;
- Monitoring of transactions and investigation of any significant deviations from normal operations;

The AML Compliance Officer interacts with the law enforcement agencies of the Republic of Estonia who are involved in the prevention of money laundering, financing of terrorism and other illegal activities.

Users are checked by analyzing their behavior in transactions. BITINTERPAY relies on data analysis as a tool for assessing risk and detecting suspicion. BITINTERPAY performs a variety of compliance-related tasks, including data collection, filtering, record keeping, investigation management and reporting.

The AML Compliance Officer also daily checking the users existence in recognized "black lists", the aggregation of transmissions to several data points, the placement of users on monitoring lists and denial of services, the opening of cases for investigation, where necessary, sending internal messages and filling out mandatory reports if this is also applicable to the Office of Affairs and Documents.

BITINTERPAY monitoring all transactions and has the right:

- Communicate suspicious transaction reports to the appropriate law enforcement authorities through an AML compliance officer;
- In case of carrying out suspicious transactions by the User, request any additional information and documents from the User;

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- In the event that BITINTERPAY has a reasonable suspicion that the User is involved in the illegal activities, the BITINTERPAY suspend or terminate the account of the User.

The list is not exhaustive, and the AML Compliance Officer will monitor user transactions on a daily basis to determine whether such transactions should be reported and treated as suspicious or that should be treated as bona fide.

BITINTERPAY in accordance with international requirements, applies practice, risk assessment for combating money laundering and the financing of terrorism.

BITINTERPAY ensures commensurability of measures to prevent or reduce money laundering and terrorist financing with identified risks.

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