

# AML policy with effect from April 1st 2021

## 1. General

1.1. The operation of the GoPay Payment System is governed by this AML Policy together with the Account Terms of Use and other policies. The AML Policy governs how we prevent the legalisation of proceeds from criminal activity and financing of terrorism.

1.2. Definitions used in this AML Policy have the meaning defined in the Account Terms of Use unless expressly stated otherwise.

## 2. Why We Identify

2.1. We are a financial institution subject to the provisions of Czech Act No. 253/2008 Coll., which makes provision with respect to certain measures against the legalisation of proceeds from criminal activity and financing of terrorism, as amended (hereinafter referred to as the "Act").

2.2. In accordance with the Act we take measures against the legalisation of proceeds from criminal activity and financing of terrorism. We fulfil obligations stipulated by legal regulations in this field so as to prevent the misuse of the financial system for the legalisation of proceeds from criminal activity and financing of terrorism and so as to establish conditions for detecting such conduct.

2.3. The Act obliges us to meet obligations in relation to Clients. The above obligations include in particular performing identification of Clients (S. 7 of the Act) and performing due diligence of Clients in cases stipulated by the Act (S. 9 of the Act).

## 3. When We Identify

3.1. We perform your identification if you make Electronic Money payments in an amount exceeding EUR 150 or stored amount at GoPay Account exceeds EUR 150 or make Redemption of Electronic Money in an amount of EUR 50 and higher during one calendar year. We also perform your identification in other cases if stipulated by the Act.

3.2. We always require that you send your identification data or perform your identification when a GoPay Account is activated and when you transfer to a higher GoPay Account level. The scope of required identification data is defined by the selected GoPay Account level.

## 4. How We Identify

4.1. Identification is performed in one of the following ways:

a. With your physical presence; we record and verify identification data from your identification card. At the same time, we verify that your appearance corresponds to the photo on your identity card;

b. Without your physical presence on condition that the first payment is made through a bank account maintained in your name and that you at the same time submit a copy of your identification documents in electronic form;

c. Without your physical presence if you submit a public deed on identification.

## **5. How We Prevent Fraud**

5.1. We apply control system and anti-fraud management system together with internal guidelines the aim of which is to prevent the legalisation of proceeds from criminal activity and financing of terrorism. In accordance with that we use risk management whose aim is to prevent the risk of having the GoPay Payment System misused for fraudulent transactions or other illegal activities. The internal guidelines are submitted for inspection to the Ministry of Finance of the Czech Republic.

5.2. Before each transaction is made, we carry out an analytical risk assessment based on information about you or information provided by third parties. We reserve the right to refuse to make such transaction upon assessment of the degree of potential risk.

5.3. We perform automated assessment of suspicious financial flows and regularly report to pertinent persons and due diligence divisions within our company as well as to public authorities such as the Ministry of Finance of the Czech Republic.

5.4. We regularly analyse threats of new risks to which we adapt the set-up of the whole system and its behaviour.

5.5. We may ask you to identify yourself again so as to verify the correctness of the originally performed identification.

5.6. We regularly check whether the activities and range of products offered on the website through which you offer or effect the sale of goods or offer or provide your services corresponds to the activity and range of products you have declared to us. We regularly do mystery shopping of goods and services in order to verify whether your activities are in line with the Contract.

## **6. Final Provisions**

6.1. We are entitled to unilaterally amend the AML Policy in accordance with the rules and terms laid down in this Article. You accept the above entitlement.

6.2. If we amend the AML Policy, we are obliged to notify all registered users of the GoPay Payment system of this change in advance by e-mail containing a link to the new AML.

6.3. The AML Policy is issued in electronic form and is available on our website.

6.4. The AML Policy comes into effect as of April 1st 2021.