



KYC AND AML Policy

Last update: August, 15 2019

General. In order to start using any of the Services, you are required to register for an Account/ Channels Account (as applicable). Under the registration process you need to provide:

1. Your full name;
2. Date of birth;
3. Place of birth;
4. Country of your main residence;
5. Your citizenship(s);
6. Mobile tel. number;
7. E-mail address;
8. Password; and
9. Your unconditional consent to be bound by our [Terms and Conditions](#), [Privacy Policy](#), [Fees Policy](#) and this [KYC and AML Policy](#), as amended from time to time.

Please note, that EXSCUDO reserves the right at its own but reasonable discretion to refuse opening the Account/Channels Account.

Limitations. EXSCUDO employs a risk-based approach when establishing of and assessing the Users' profiles and the scope of Services and transaction limits available to the relevant User. Depending on our Users' risk profiles, their proposed Cryptocurrency and/or Fiat Funds input and/ or withdrawals volumes and other factors, the following procedure and scope of services shall be applicable:

| Tiers | Cumulative Personal Data/Process | Input/withdrawals limits for Crypto (only) Accounts* | Input/withdrawals limits for Crypto-Fiat Accounts* |
|----------------|--|--|---|
| Tiers 1 | 1. Account/Channels Account registration data (see above) | No trading transactions allowed. No withdrawal. No deposit. | No trading transactions allowed. No withdrawal. No deposit. |
| Tiers 2 | 2. Identity Verification process by the electronic identification service provider 3. Residential address | Crypto limits are set depending on the risk profile of the User on a case-by-case basis. Please contact verification@exscudo.com to confirm your limits. | Fiat limits are set according to requirements of the respective authorized financial institution. Please contact verification@exscudo.com to confirm your limits. |

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|-----------------------|---|---|--|
| <p>Tiers 3</p> | <p>4. Providing information a.o. on the source of funds/ Cryptocurrencies by filing in and signing the Questionnaire. Please send the scan copy of the duly signed Questionnaire and supporting documents to verification@exscudo.com</p> | <p>Crypto limits are set depending on the risk profile of the User on a case-by-case basis. Please contact verification@exscudo.com to confirm your limits.</p> | <p>Fiat limits are set according to requirements of the respective authorized financial institution. Please contact verification@exscudo.com to confirm your limits.</p> |
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*Please note that EXSCUDO reserves the right to request any additional information and supporting documents and/or request the video interview with our compliance officer at its sole discretion.

Please note that EXSCUDO reserves the right to change applicable limits as we reasonably consider necessary on a case by case basis or if prescribed by applicable law.

User Identity Verification. The User agrees to provide us, our Affiliates and/or third party service providers with the information (including but not limited to portrait photo, Identity Document photos, residential address and other personal data) which is requested for the purposes of application of any diligence measures as prescribed by the applicable law, incl. identity verification, and the detection of money laundering, terrorist financing, fraud, or any other financial crime (the “Identity Verification”). The User authorizes and permits our Affiliates and/or third party service providers (as applicable) us to record and store such information.

Under providing us with this or any other information that may be required, you confirm that the information is accurate, complete and authentic.

You must ensure the information on your Account/Channels Account is always accurate, complete and up to date. If at any time we may suspect that your information is outdated or inaccurate, we may contact you and request further information or request you to pass through the Identity Verification process again.

You shall authorize us to conduct the inquiries, whether directly or via third party service providers, that we consider necessary to verify your identity, other personal data and to take action we reasonably consider appropriate depending on the results of such inquiries.

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