

PayBitoPro

Client Acceptance Policy

(European Union)



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1. Introduction

The Customer Acceptance Policy (CAP) sets out the principles, criteria, and procedures under which PayBitoPro, a digital asset service provider, establishes and maintains business relationships with customers. The policy aims to mitigate exposure to financial crime, fraud, money laundering, terrorist financing, and other illicit activities by ensuring that all clients are vetted through a risk-based, transparent, and consistent onboarding process in accordance with applicable laws and regulations.

a. Objectives and Scope:

This Policy is designed to:

- i.* Establish explicit customer acceptance criteria (CAC) in line with the firm's Business-Wide Risk Assessment (BWRA).
- ii.* Enforce robust Know Your Customer (KYC) and Customer Due Diligence (CDD) processes.
- iii.* Ensure PayBitoPro only engages with customers whose identity and business intent can be reliably verified.
- iv.* Uphold compliance with applicable anti-money laundering laws, the Proceeds of Crime Act 2002, and relevant regulatory handbooks and standards.
- v.* Prevent onboarding of high-risk customers without appropriate Enhanced Due Diligence (EDD) measures.
- vi.* Support consumer duty by treating all customers fairly, including those in vulnerable circumstances.

This policy applies to all individual, institutional, and business clients accessing PayBitoPro's regulated and non-regulated services, including trading, custody, and portfolio management.



2. Customer Categories

a. Private Individuals:

PayBitoPro accepts individual clients subject to verification of:

- i.* Full name, date and place of birth, nationality.
- ii.* Residential address (and tax residency where applicable).
- iii.* Valid government-issued photo ID (e.g., passport, driver's license).
- iv.* Purpose and intended nature of business relationship.
- v.* Source of funds and expected transaction behavior.

High-risk individuals (e.g. Politically Exposed Persons (PEPs), persons from high-risk jurisdictions) require EDD, including proof of wealth, source of funds, and additional documentation.

b. Legal Entities (Corporates, Partnerships, Trusts):

To accept institutional or corporate clients, PayBitoPro collects:

- i.* Company name, incorporation number, registered address.
- ii.* Legal form and structure.
- iii.* Corporate registry extract (dated within 3 months).
- iv.* Nature and purpose of the relationship.
- v.* Information on Ultimate Beneficial Owners (UBOs).
- vi.* Identification of all directors and authorized signatories



Foreign legal entities must demonstrate a legitimate business need to access services and will be onboarded only with CCO or MLRO approval.

c. Sole Traders & Entrepreneurs:

Sole traders are required to provide:

- i.* Registration with relevant national or international registry (e.g., HMRC, Companies House).
- ii.* Tax identification number.
- iii.* Valid personal and business identification documentation.

d. Customers in Vulnerable Circumstances:

As part of its Consumer Duty obligations, PayBitoPro takes special measures when onboarding customers who:

- i.* Disclose mental, physical, financial, or emotional vulnerabilities.
- ii.* Exhibit erratic account activity, confusion, or distress.
- iii.* Request support in understanding products, risks, or account features.

Such customers may receive tailored onboarding support, additional educational material, and additional verification procedures to safeguard their interests.



3. Customer Acceptance Criteria (CAC)

a. A customer shall only be accepted if:

- i.* They pass all KYC/AML screening and due diligence checks.
- ii.* Their identity, source of funds, and business rationale can be verified.
- iii.* They do not appear on any sanctions, watchlists, or PEP databases.
- iv.* There is no evidence of involvement in fraud, market manipulation, or financial crime.
- v.* They agree to PayBitoPro's Terms of Service and Disclosures, including risk warnings and arbitration clauses.

b. Customers not accepted:

- i.* Shell banks or anonymous account holders.
- ii.* Entities from FATF-blacklisted jurisdictions.
- iii.* Clients with inconsistent or unverifiable information.

4. Risk-Based Approach to Onboarding

PayBitoPro implements a risk-scoring methodology based on:

- a.* Customer profile (occupation, status, wealth).
- b.* Geographic risk (based on FATF, HMT, and OFSI designations).
- c.* Product/service type (e.g. OTC trading vs. custodial services).
- d.* Transaction behavior (e.g. use of privacy coins or high-volume transfers).



Depending on the risk rating, customers are assigned to Standard, Medium, or High Risk tiers, triggering different levels of due diligence and ongoing monitoring.

5. Digital Onboarding and Verification

Customers may onboard via:

- a.* Face-to-face identification (in limited circumstances).
- b.* Remote digital onboarding using video KYC, biometric verification, and identity verification software.
- c.* Verification is conducted via compliant third-party tools with fuzzy-matching and sanctions screening capabilities.

6. Ongoing Monitoring & Periodic Reviews

PayBitoPro conducts:

- a.* Ongoing Transaction Monitoring for unusual activity.
- b.* Periodic KYC refreshes (at least every 1–3 years, depending on risk level).
- c.* Real-time alerts for flagged transactions.
- d.* Triggers for EDD including large transactions, new jurisdictions, and altered behavior patterns.

7. Approval & Governance

The Chief Compliance Officer (CCO) oversees CAP implementation. Final approval for high-risk or exception cases lies with:



- a.* Money Laundering Reporting Officer (MLRO).
- b.* Director of Compliance, where elevated risk is involved.

All staff involved in onboarding receive AML/CFT and customer protection training, including modules on fraud, vulnerability, and regulatory reporting.

8. Recordkeeping & Review

- a.* All client records, due diligence documentation, and decision logs are retained for at least five years.
- b.* The policy is reviewed annually and updated to reflect regulatory changes, relevant guidance, and operational needs.