



**ZETLY**

# AML AND KYC POLICY



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## Introduction

Zetly OÜ Anti-Money Laundering and Know Your Customer Policy (hereinafter – “AML and KYC Policy”) is designated to prevent and mitigate possible risks of token ZET sale being involved in any kind of illegal activity.

Existing regulations require Zetly OÜ to implement clear and effective procedures to prevent criminal acts like - in particular but not exclusively - money laundering, terrorist financing, drug and human trafficking, proliferation of weapons of mass destruction, corruption and bribery. Additionally or Zetly OÜ is obliged to take action in case of any form of suspicious activity from its Users.

This AML and KYC Policy applies to both natural and legal persons. Legal entities joining the ZET Token Sale , which is defined as making a Token ZET token purchase in a specific method stated in the clause 4 of this AML and KYC Policy will receive purchased tokens to their wallet address after required AML and KYC procedures that include providing specific documents.

## **1. AML and KYC Policy covers the following matters:**

1. Verification procedures.
  - 1.1. Basis
  - 1.2. Identity verification
  - 1.3. Anti-money laundering procedure
  - 1.4. Authenticity verification
  - 1.5. Right to report
  - 1.6. Continuous basis of information verification
  - 1.7. Transaction's refusal procedure
  - 1.8. Payment cancellation

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- 2.1. Definition
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- 2.3. Law enforcement

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- 4.2. Payment cards usage control
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- 4.4. Address analysis
- 4.5. Liability
- 4.6. Due diligence

## **5. Risk Assessment**

## **6. AML and KYC Policy**

- 6.1. Acceptance
- 6.2. Privacy Policy

## 1. Verification procedures

### 1.1. BASIS

The main international standard for preventing illegal activities is the KYC and AML procedure. The abbreviation KYC, derived from the English Know Your Customer, is also known in Poland as the PSK policy, Know Your Customer. KYC consists of collecting such a set of information about the client that allows you to verify his identity, assess the business profile, and confirm his credibility. The acronym AML, on the other hand, comes from the English term Anti-Money Laundering, which means combating „money laundering” from criminal activities or using the company’s money system to finance criminal activities. Zetly OÜ establishes its own verification procedures under the KYC and AML standards.

### 1.2. IDENTITY VERIFICATION

Zetly OÜ identity verification procedure requires the User to provide reliable independent sources of documents, data or information (e.g. ID card, international passport, bank statement, utility bills) every time the User is requested to provide certain information. For AML and KYC Policy purposes, or Zetly OU hereby reserves the right to collect User information.

### 1.3. ANTI-MONEY LAUNDERING PROCEDURE

Zetly OÜ anti-money laundering procedure requires the User to provide information about the source of the funds the User uses to purchase ZET tokens every time the User is requested to provide certain information. Zetly OÜ is not responsible for any errors or omissions in the information provided by the User.

#### **1.4. AUTHENTICITY VERIFICATION**

Zetly OÜ shall take steps to verify the authenticity of documents and information provided by Users, use all legal methods to double-check identification information and hereby reserves the right to investigate the actions of certain Users that have been found risky or suspicious.

#### **1.5. RIGHT TO REPORT**

We may therefore report our suspicions regarding any activity of the users to local regulators, enforcement bodies and other compliance bodies. Those kind of actions have a goal of ensuring that the capital being used on our platform has a legitimate origin and create a safeguard in case of individuals or groups wanting to allocate their money from illegal activities on our platform.

#### **1.6. CONTINUOUS BASIS OF INFORMATION VERIFICATION**

Zetly OÜ hereby reserves the right to verify the User's identity on a continuous basis, especially when the verification information has been changed or the User's activity has been deemed suspicious, even if they have already undergone identity verification. User verification information shall be collected, stored, transferred and protected strictly in accordance with Zetly OÜ Data Protection Policy and the relevant rules. Following the verification of User's identity, Zetly OÜ disclaims potential legal liability in situations where its services are used for illegal activities.

## **1.7. TRANSACTION PROCEED REFUSAL**

Zetly OÜ may refuse to proceed the transaction of transferring the purchased tokens to the User if the User refuses to provide any demanded information. Zetly OÜ may refuse to issue tokens to the User if:

**1.7.1.** The User does not provide any demanded information to Zetly OÜ and preclude to complete any diligence procedures on the User

**1.7.2.** The User have been previously identified as engaged in suspicious activity

**1.7.3.** The User is the citizen of a country considered to be exposed to a high risk of money laundering or financing terrorism

**1.7.4.** The User is listed on a sanctions list in any of the jurisdictions to which Zetly OÜ may transfer purchased tokens, or otherwise identifies the User as exposed to a high risk of money laundering or financing terrorism.

## **1.8. PAYMENT CANCELLATION**

The User cannot cancel a request to purchase the tokens. Zetly OÜ may cancel the User's purchase of the tokens if it is impossible to verify User's identity or conduct any other procedures that Token ZET Sale is required to conduct. Zetly OÜ may not refund User any amount until the User has provided any demanded information required by law.

## 2. Operation of the Compliance Officer

### 2.1. DEFINITION

The Compliance Officer is the person, duly authorized by Zetly OÜ, whose duty is to ensure the effective implementation and enforcement of the AML and KYC Policy.

### 2.2. DUTIES

It is the Compliance Officer's responsibility to supervise all aspects of Zetly OÜ anti-money laundering and counter-terrorist financing, including but not limited to:

**2.2.1.** Collecting User's identification information

**2.2.2.** Establishing and updating internal policies and procedures for the completion, review, submission and retention of all reports and records required under the applicable laws and regulations

**2.2.3.** Monitoring transactions and investigating any significant deviations from normal activity

**2.2.4.** Implementing a record management system for appropriate storage and retrieval of documents, files, forms and logs

**2.2.5.** Updating risk assessment regularly

**2.2.6.** Providing law enforcement with information as required under the applicable laws and regulations.

### 2.3. LAW ENFORCEMENT

The Compliance Officer is entitled to interact with law enforcement, which are involved in prevention of money laundering, terrorist financing and other illegal activity.

## **2.4. CONTACT WITH THE CLIENTS AND AUTHORITIES**

The Compliance Officer is obliged to communicate effectively with the clients and authorities having any complaints or questions that are being addressed to him regarding the Zetly OÜ AML and KYC Policy as also its implementation in order to ensure the transparency and credibility of the platform. The address to contact the Compliance Officer is [kycaml@zetly.io](mailto:kycaml@zetly.io) Any kind of correspondence sent to the Compliance Officer will be answered by him within the time frame of 14 working days.

## **3. Monitoring transactions**

### **3.1. DATA ANALYSIS**

Users verification is carried out not only by checking their identity, but also by analyzing the models of transactions used by the Users. Zetly OÜ therefore relies on data analysis as a tool for assessing risk and identifying suspicions. Zetly OÜ carries out regulatory compliance tasks, including data collection, filtering and record keeping.

### **3.2. SUSPICIOUS TRANSACTIONS REPORTING**

With regard to the AML and KYC Policy, Zetly OÜ will monitor all transactions, and it reserves the right to ensure that transactions of suspicious nature are reported to the proper law enforcement through the Compliance Officer and request the User to provide any additional information and documents in case of suspicious transactions. The Compliance Officer will monitor User's transactions on a day-to-day basis in order to define whether such transactions are to be reported and treated as suspicious.

## 4. Payment methods

### 4.1. STRIPE INC-PAYMENT GATEWAY

The User may purchase ZET tokens by linking the digital wallet address and managing the cryptocurrency deposits by the User, by the payment gateway, or by card or wire transfer. To carry out a transaction in a chosen way, the User must follow the relevant instructions on the Zetly OÜ site.

### 4.2. PAYMENT CARDS USAGE CONTROL

Zetly OÜ may refuse to complete or block, cancel or reverse a transaction of the ZET token purchase made with payment cards usage if the User is suspected of money laundering, terrorist financing, fraud, any other financial crime, or any other illegal action. Zetly OÜ is under no obligation to disclose the details of its credit card risk management and security procedures to the User.

### 4.3. ZETLY LAUNCHPAD AND WALLET TRANSFER CONTROL

Zetly OÜ may refuse to end or block, cancel or reverse the ZET Token purchase transaction made with the Zetly Launchpad if the User is suspected of money laundering, terrorist financing, fraud, any other financial crime, or any other illegal activity.

### 4.4. ADDRESS ANALYSIS

Zetly OÜ may analyze the cryptocurrency addresses against common blacklists and known security discrepancies, to ensure that the funds do not come from illicit sources, and there are no signs of money laundering (location, layers, integration), either manually or using a third-party service.

#### **4.5. LIABILITY**

Zetly OÜ has no control over, or liability for, the delivery, quality, safety and legality or any other aspect of any goods or services received or purchased from Zetly, and Zetly Launchpad Zetly Launchpad, whose supplier is Coin Factory (Accubits Technologies Inc) based in 8230 Boone Blvd, Suite 445 Vienna, Virginia, 22182, USA.

### **5. Risk assessment**

Zetly OÜ, in accordance with international requirements takes a risk-based approach to combating money laundering and the financing of the terrorism. By applying a risk-based approach, Zetly OÜ can ensure that measures to prevent or mitigate money laundering and terrorist financing are proportionate with the identified risks. This makes it possible for resources to be allocated in the most efficient way. The principle is to allocate resources corresponding to priorities so that the highest risks are given the closest attention.

### **6. AML and KYC Policy**

#### **6.1. ACCEPTANCE**

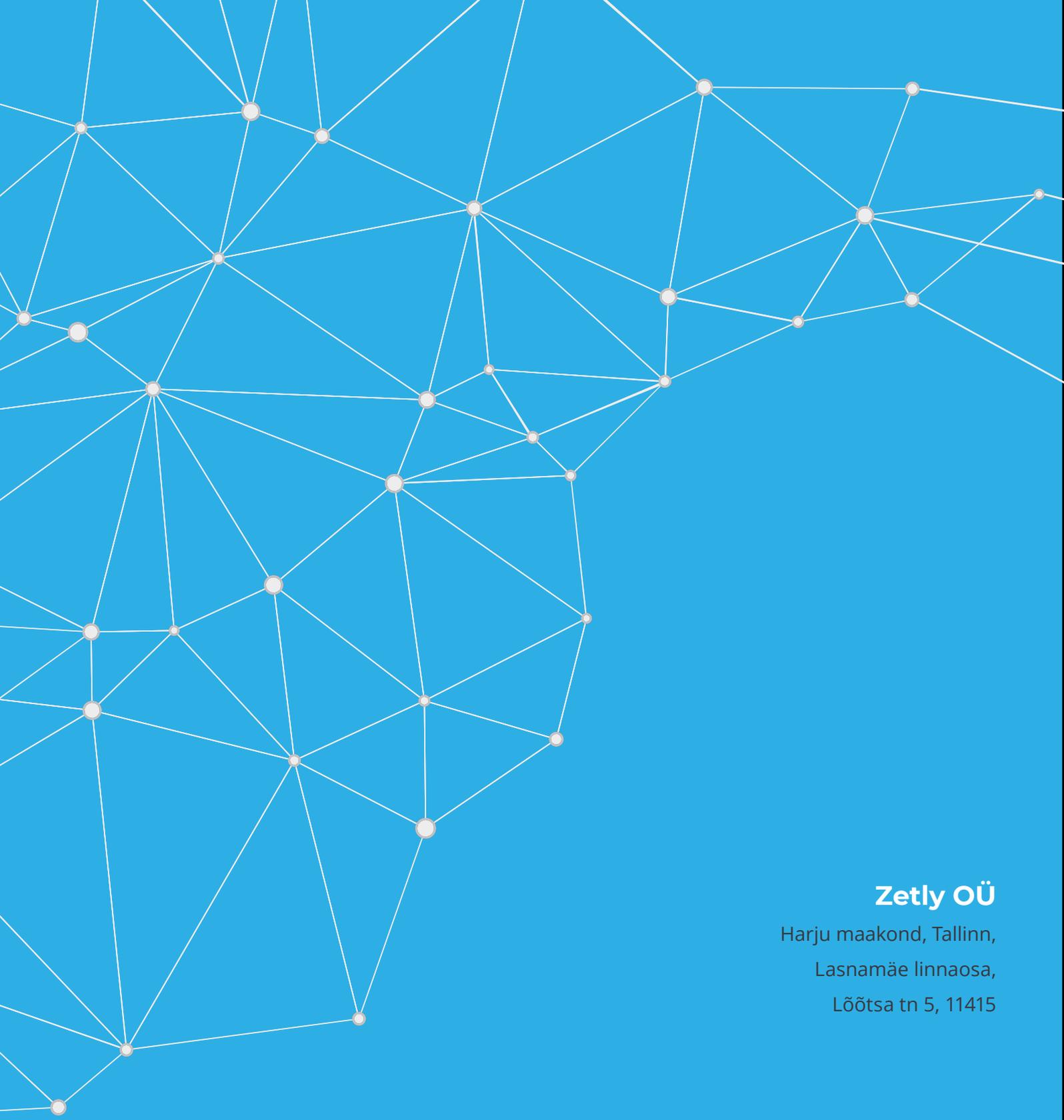
By joining the Zetly Token Sale, which is defined as making a Token ZET purchase in a specific method stated in the clause 4 of this AML and KYC Policy, the User accepts the terms of this AML and KYC Policy and hereby agrees to have read, understood and accepted the Terms of Use and Data Protection Policy available at: <https://www.zetly.io> In addition, when using certain services, the User may be subject to additional agreements applicable to such services. The User must stop using the services and the website if they do not agree with the AML and KYC Policy and the Terms of Use and Data Protection Policy.

#### **6.2. PRIVACY POLICY**

User's identification information will be collected, stored, shared and protected strictly in accordance with the Zetly OÜ Data Protection Policy and related regulations.

## Disclaimer

The purchase of ZET tokens is subject to applicable laws and regulations and is not allowed in certain restricted jurisdictions. Prospective buyers are required to obtain appropriate advice also with regard to applicable laws and regulations in their home countries and places of residence, before making any specific decisions. You are not eligible and should not purchase a ZET token if you are a citizen or resident (tax or otherwise) of any country, state, or territory where the purchase of a ZET token may be prohibited.



## Zetly OÜ

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