

SUMMARY OF IDENTIFICATION AND CUSTOMER DUE DILIGENCE PROCEDURE

UR Trade Fix Ltd

Previous Version Date:	2018
Current Version:	November 2019
Next Review Date:	November 2020

Tradeo is operated by UR TRADE FIX Ltd, a Cyprus Investment Firm (CIF) supervised and regulated by the Cyprus Securities and Exchange Commission (CySEC) with CIF Licence number 282/15 and Company registration number HE336677, located at 140 Vasileos Constantinou, 1st floor Tofias Building, 3080, Limassol, Cyprus.

UR Trade Fix Ltd (hereinafter “the Company” or “the CIF”) is authorised and regulated by the Cyprus Securities and Exchange Commission (“CySEC”) as a Cyprus Investment Firm (CIF) to offer certain investment and ancillary services and activities (found on the Company’s website and on CySEC’s website at www.cysec.gov.cy) under the Investment Services and Activities and Regulated Markets Law of 2017 L.87(1)/2017, as subsequently amended from time to time (“the Law”) and collects, processes and stores personal data of its actual and potential clients and website users through service offering.

The Company when carrying out its activities adheres to, inter alia, the provisions of the Prevention and Suppression of Money Laundering and Terrorist Financing Laws of 2007-2018, Law No. 188(I)/2007 (hereinafter “the AML Law”) as amended from time to time, and the Directive for the Prevention and Suppression of Money Laundering and Terrorist Financing (hereinafter “AML Directive”).

Following the said legal framework, the Company has implemented the following measures in relation to the identification and customer due diligence procedure, in order to prevent any money laundering activities and identify suspicious transactions.

1. Completion of the account opening application, which personal information (name, date of birth, etc), construction of economic profile.
2. Carrying out the appropriateness test to assess the knowledge and experience of the Client and product governance test.
3. Collection of:
 - a. Proof of Identification: A valid Passport or National Identity Card
 - b. Proof of Address: A recent (up to 6 months) utility bill, local authority tax bill or a bank statement or any other document same with the aforesaid
 - c. Proof of source of funds in cases the Company deems necessary

The Company reserves the right to request additional documents from its clients whenever it deems necessary.

It is important to note that the identification and verification of the customer and the beneficial owner must occur before the establishment of the business relationship or the carrying out of an occasional transaction.

By derogation of the above, the verification of the client may be completed during the establishment of a business relationship, if this is necessary so as not to interrupt the normal conduct of business and where there is little risk of money laundering or terrorist financing occurring: Provided that in such a case the customer and beneficial owner identity verification procedures shall be completed as soon as possible not later than 15 days after the initial contact. It is noted that the initial contact takes place when the client either accepts the terms and conditions or makes his first deposit, whoever comes first.

If the client fails to provide the abovementioned within the timeframe of 15 days, the commencement of a business relationship will be terminated on the date of the deadline’s expiry and all deposited funds will be returned to the customer/beneficial owner, in the same bank account from which they originated.