

KYC & AML Policy

Wingo Group LTD (referred to as the “Company” or “Wingo group”) is obliged to follow certain requirements as set out by the local regulator for preventing and suppressing money laundering activities, which obliges the Company to follow strict Anti-Money Laundering and Know Your Customer (AML/KYC) and Counter-Terrorism Financing procedures while also requires the Company to obtain certain verification information as well as documentation. To monitor the accordance with legal requirements and recommendations, Company established a Compliance department developing AML/KYC procedures, obligatory for all employees and customers, and determining the policy of engagement with any person who intends to become our customer. In this case, Money Laundering Compliance Officers (MLCO) are to be a guardian for financial institutions and one of the last gateways for identifying financial crimes like money laundering and fraud.

Due to obligatory “Know Your Client” procedures, Wingo Group must follow in accordance with international “Anti-Money Laundering” regulations. The Company is vigilant in ensuring the prevention of its involvement or misuse in money laundering activities and is not knowingly accepting assets or entering business relationships where there is reasonable cause to believe that such assets may have been acquired illegally or that they represent the proceeds of criminal activity. The Company shall promptly report suspicious transactions relating to any account to the Supervisory Authority. Where there is suspicion that the source of funds may be criminal or that a client may be involved in criminal activity, the Company shall follow established procedures for assessing the evidence and determining what course of action should be pursued.

1. Wingo Group LTD does not give individual the option of dealing with them anonymously, or under a pseudonym, as Wingo Group is required to identify all trading client under the Union of the Comoros (Comoros) Anti-Money Laundering and Terrorist Financing Law, as amended. In addition, it is impracticable for Wingo Group to deal with individuals who have not identified themselves or used a pseudonym.

2. Where your personal information is being collected under the GDPR, Wingo Group will also take reasonable steps to make you aware of:

- Whether Company is required to collect your personal information under a contractual relationship or to comply with our legal or regulatory obligations, or if we are collecting your personal information based on your consent and your right to withdraw your consent at any time; your data subject right under the GDPR (please see action “Access to Personal Information” below).
- Your right to lodge a complaint with the relevant data protection supervisory authority.



- If the Company intends to use automated decision making, including profiling to process your personal information, and a description of the automated decision-making process and consequences.

3. Wingo Group are required by the Union of the Comoros (Comoros) Anti-Money Laundering and Terrorist Financing Law, as amended to verify your identity before we can provide you with financial products and services. Electronic verification allows us to verify your identity by using electronic tools and external data sources.

4. Electronic Verification Process: In order to verify your identity electronically, we will ask you for your details (such as your name, address, and date of birth) and details of your identification documents. This information will be passed on to external organizations to match your information with information on their databases electronically. To do so:

- If a natural person conducts the transaction, the client must adequately identify and verify his identity, including information relating to the person's name and address, the national identity card, social security document, passport, or other applicable official identifying document.
- If a legal entity conducts the transaction, adequately identify the beneficial owner of such entity, and take reasonable measures to identify and verify its ownership and control structure, including information relating to the customer's name, legal form, head office address, and identities of directors; the principal owners and beneficiaries and control structure; provisions regulating the power to bind the entity and to verify that any person purporting to act on behalf of the customer is so authorized and identify those persons.

These organizations will assess and advise us whether all or some of the information you provided matches their records.

The external data sources used to verify your identity include:

- Credit information files held by Wingo Markets (this is only to confirm your identity and is not a credit check).
- Publicly available information such as the electoral roll and white pages.
- Information held by the official record holder via third party systems.

It is an offense under the Union of Comoros (Comoros) Anti-Money Laundering and Terrorist Financing Law, as amended, to provide false and misleading information about your identity.

In the course of the investigation, the Company has the right to request additional copies of documents confirming your identity or the identity of other individuals in the corporate structure, as well as documents confirming the place of living and lawful possession and legal origin of funds. The Company also has the right to demand the provision of original documents for review in case of any doubts from the Company.

5. Your Agreement: By agreeing to our terms and conditions you affirm that:

- The information you are providing is your personal information and you have the authority to provide it to us.
- We may use and disclose your personal information for the purposes of electronic verification as described above.
- You are not aware, and have no reason to suspect, that the money you use to fund your account has been or will be derived from or related to any money laundering, terrorism financing or by agreement.
- The processes of your investment will not be used to finance any illegal activities.
- The Company is not obliged to inform you or other people about the measures taken to fulfill the AML legislation. In addition, the Company is not obliged to inform you or other people about any suspicions about the reasons for the refusal of execution of your trading order, refusal to open the account, need for providing any documents, etc.
- This AML/KYC policy is an integral part of any agreement concluded between you and the Company. Non-compliance with this policy can be grounds for termination of the agreement at the Company's sole discretion.

Should you have a question about our Money Laundering Prevention Policy, please direct your questions to our Compliance Department.