



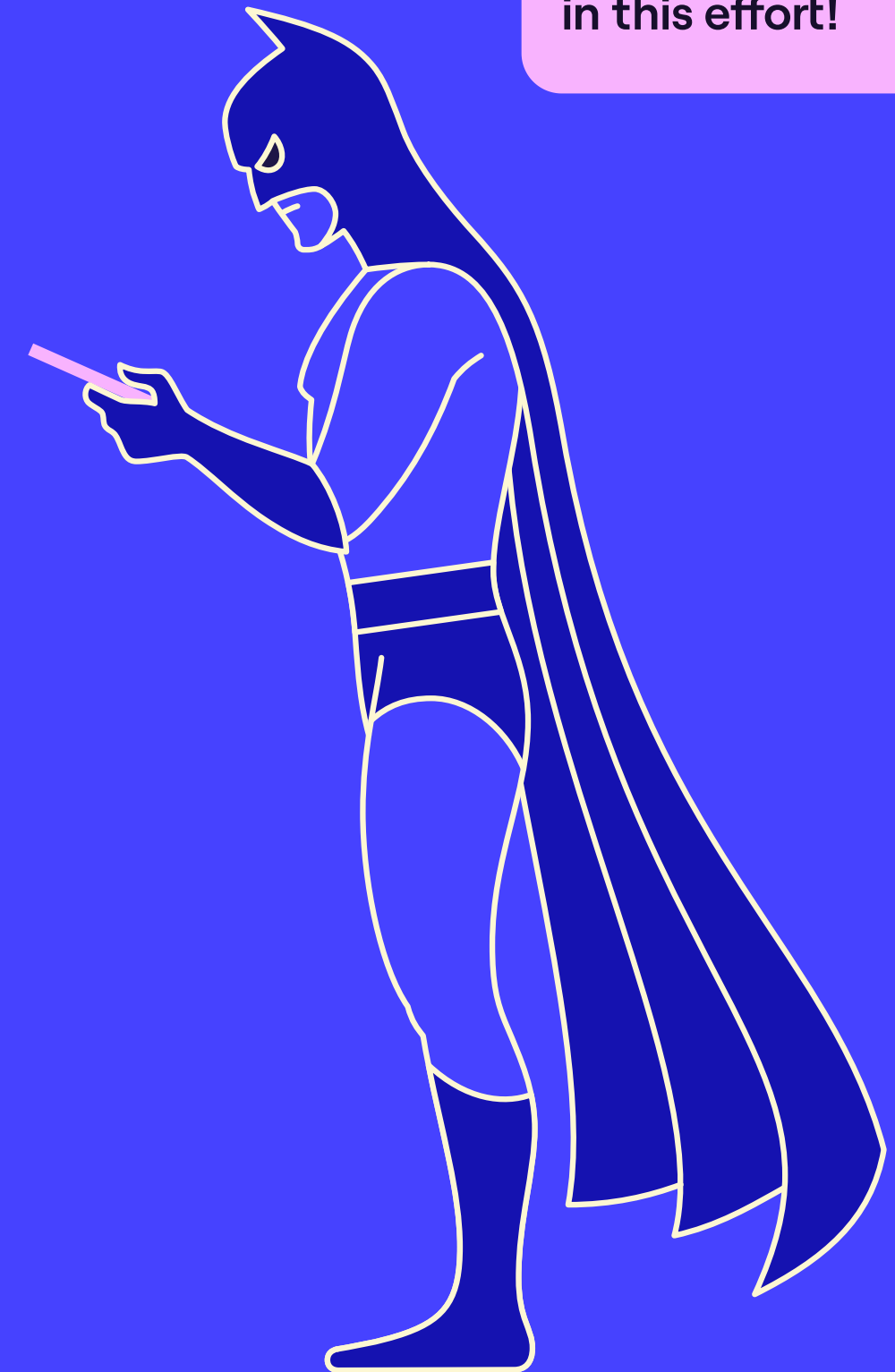
OPP and our Customer Due Dilligence.

All you need to know about why we need personal information from our clients and how we keep your information safe.

Help us keep the financial system safe.

At Online Payment Platform (OPP), we're committed to keeping the financial system safe, secure, and trustworthy. This includes measures to prevent money laundering and terrorism financing. We achieve this through our customer due diligence (CDD) and Know Your Customer (KYC) policy.

As a user of our payment services, you're our valued customer. This means we need to get to know you better, understand your business, and the transactions you'll be making through us. This document outlines the key aspects of our policy that might come up during our interactions, both when you first become a customer and as we continue to serve you.




We appreciate your cooperation in this effort!

What information do we need from you...


We try to minimize the burden on you and the information we request.

Our policies are risk-based, meaning the less risk involved, the less information and verifications we'll need. It's crucial to provide us with accurate and timely information, as incomplete or delayed information can increase the risk associated with your transactions.



Please note that we won't always request all the information at once, and our requests will be based on what's necessary for us to manage the relationship effectively.

We may ask you to provide proof of certain information to verify its accuracy.



Based on the information you provide, we'll determine whether you or your business align with our risk appetite and whether we can offer our payment services to you.

We reserve the right to not enter into a relationship with you or to terminate the relationship if the information or risk profile changes.

Consumer Merchant

When you apply with OPP as a consumer merchant, we might request information from you, such as:

- Full name
- Birthday
- Country of Residence
- Address of residence
- Phone number
- Email address
- Bank account information
- Tax Identification Number
- Shipping address
- Political Exposed Person (PEP) status*
- Source of Funds declaration**



What is your name?

Joost



What is your residence address?

Kanaalweg 1, 2628 EB Delft



* See page 10 for more information.

** The Source of Funds declaration is a document or statement disclosing the origin of financial resources or assets.



Business Merchant

When you apply with OPP as a business, we might request information from you, such as:

- Chamber of Commerce Registration or Equivalent
- Tax Identification Number (TIN)
- Bank Account Details
- Representative Details
- Registered Address
- Shipping Address
- Website/Webshop Information
- Product/Service Descriptions
- Company Organizational Chart
- Ultimate Beneficial Owner (UBO) Information*
- Higher Management Details
- Shareholders Register
- Articles of Association
- Annual Reports
- Source of Funds Declaration**
- Invoices (Purchase and Sale)



What is your website?



Your product/service?



* See page 7 for more information.

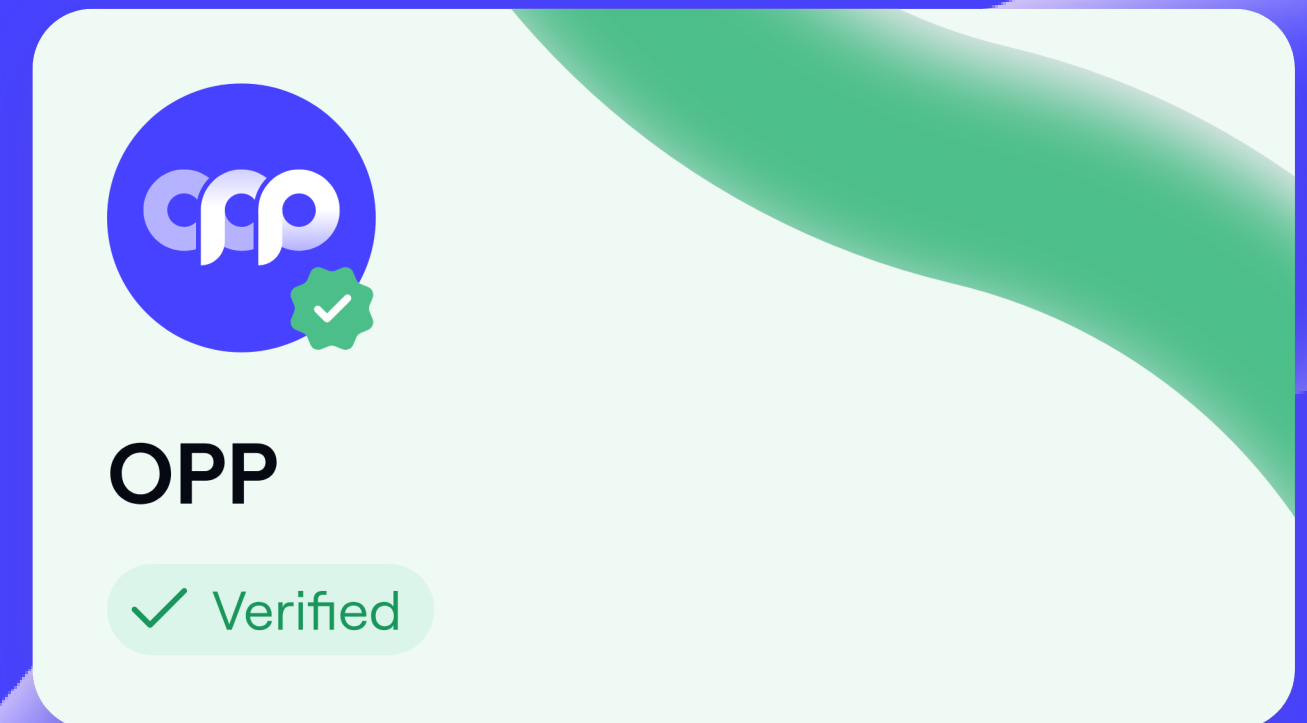
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Verification.

Sometimes we need to verify the information you provided.
Therefore, we might request supporting documents or sources.

Such sources can be:

- Identity documents
- Bank account statements
- SMS verifications (when you register as a consumer)
- Company extracts
- Organograms
- Extract from the national UBO register
- PEP explanation
- Source of funds documentation



Identifying Ultimate Beneficial Owners of your business.

As part of our obligations, we need to apply special care to the identification and verification of the Ultimate Beneficial Owners (UBOs) of any organisation we are entering a business relationship with.



Ultimate Beneficial Owners.

UBOs are natural persons who ultimately own or control an organisation to a significant amount.

For verification we might request an extract from your national UBO register.

For each individual within the company that can be classified as a UBO, we might request additional the same information as shared under “applying as a customer”.

If no individual within the company can be assigned as an UBO, we will ask you for the information of the Higher Management instead.

We account as UBO any person who:



Owns more than 25% of the capital of an organisation



Controls more than 25% of the voting rights



Exercise control comparably (e.g. as a general partner or through a veto right)

What else matters?

The image features a dark blue background with several wavy, overlapping bands of color. A prominent blue band curves across the lower half of the frame. Below it, a yellow band is visible on the left side, and a pink band is on the right side. The overall aesthetic is modern and abstract.

Risk Indicators.

Certain activities or characteristics may raise red flags and indicate a higher risk for money laundering or terrorism financing.

Please be aware of these potential indicators and understand why we might spend more effort in reviewing your situation:

Transactions

Involving high-value goods, real estate, crowdfunding and donations, medical supplies and medicines, personal services and adult / erotic content.

Organizational structures with complex hierarchies:

Complex organizational structures with multiple levels of ownership or control can make it difficult to track transactions and identify beneficial owners, increasing the risk of money laundering.

Politically Exposed Persons (PEPs):

Politically Exposed Persons (PEPs): Transactions involving PEPs, individuals with prominent public positions, warrant closer examination due to their heightened exposure to potential corruption and bribery.

Incorrect or incomplete information:

Providing inaccurate or incomplete information about your transactions or identity can raise suspicion, as it may indicate an attempt to conceal.

Foundations for administration:

Foundations or trusts used for administrative purposes may be used to disguise or channel illicit funds, so they're subject to stricter scrutiny.

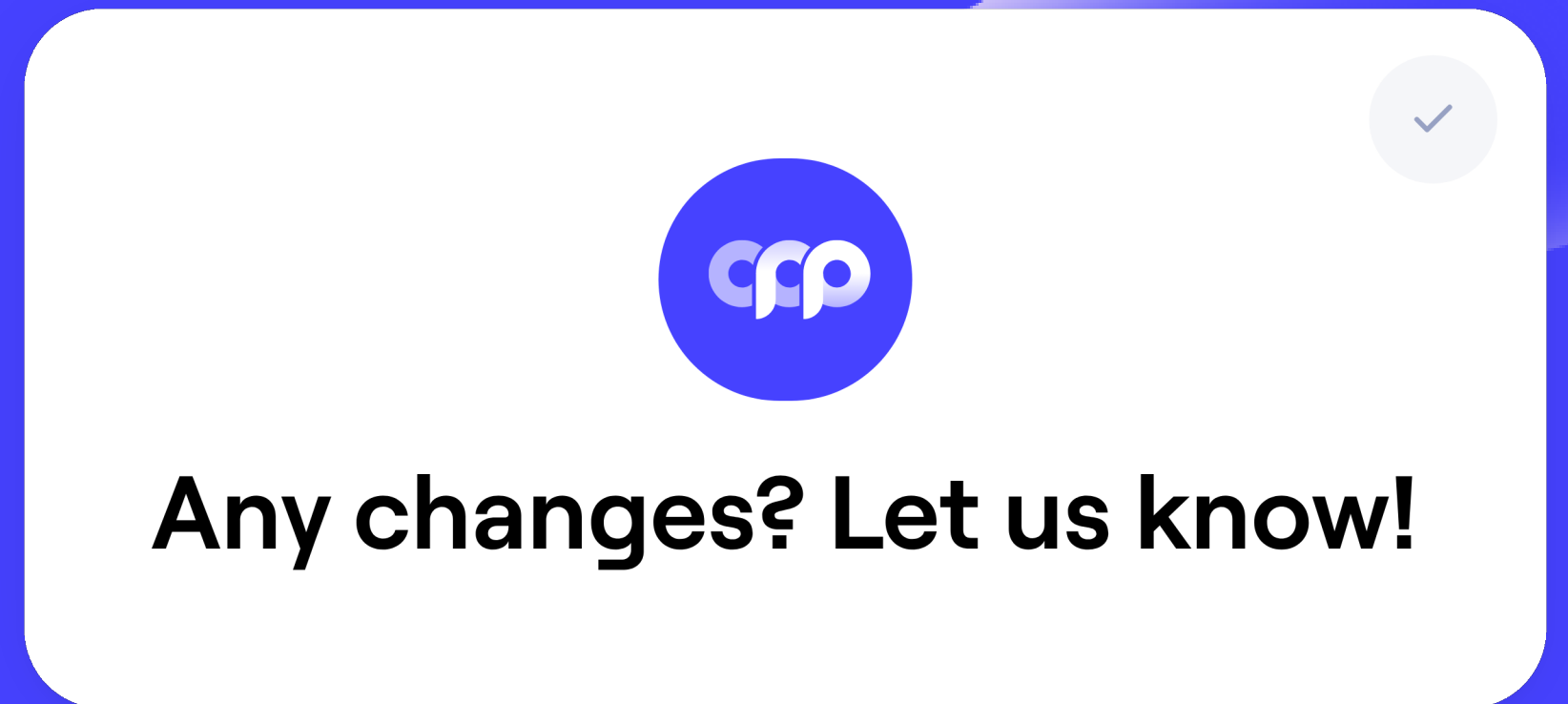
Unwillingness to provide information:

Refusing to cooperate with our inquiries or provide requested information can also raise concerns, as it may suggest an attempt to hide or obstruct our verification process.

Ongoing monitoring.

We don't just verify your information when you first sign up for our services; we also keep an eye on it throughout our relationship. That's why we need you to promptly inform us of any changes to the information you provided. For instance, if you take on a public role and become a Politically Exposed Person (PEP), or if your company's ownership percentages change.

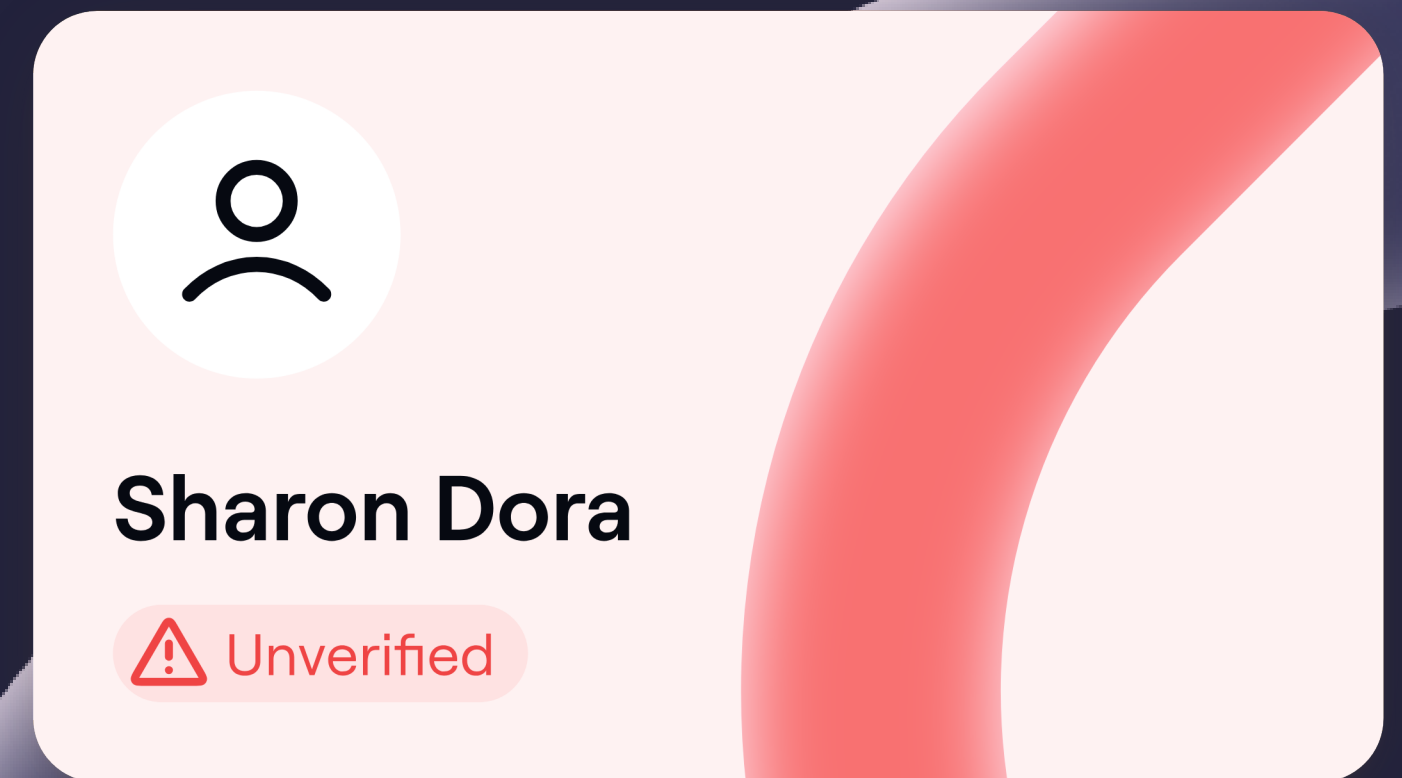
We also conduct our own periodic checks to ensure your information remains accurate. We might request you to confirm previously provided information or provide updated details. We'll also monitor your transactions and request additional information if necessary. In case our policies or legal obligations change, we might ask you for further information.



Suspension or blocking.

If you don't cooperate with our requests, provide inaccurate or outdated information, or take too long to respond, we might suspend your access to our payment services. This means we won't be able to process payments for you until you comply with our requests and we've reviewed the information.

If we suspect fraud, misuse of our services, or knowingly false information, we'll block you from using our services altogether.



Privacy.

We value your privacy and will only request the information that is necessary for our legal compliance policies.

To inform you about our privacy policy we have a special page on our website dedicated to your privacy:

<https://onlinepaymentplatform.com/privacy-statement>

About OPP

Online Payment Platform (OPP) is a payment service provider that specialises in simplifying payments for platforms and marketplaces.

More than 200 platforms and millions of consumer and business merchants across Europe use OPP's services and process a transaction volume of several billion euros. Its customers include Kleinanzeigen, Gumtree, Royal FloraHolland, Nature.House, Marktplaats and PayPal.

OPP is headquartered in Delft, the Netherlands, and employs more than 80 people. OPP also has offices in Antwerp, Berlin and London. Online Payment Platform is part of the Worldline Group.