

Guide to Certificationof Documents

Last updated: 3 February 2023

Introduction

Certification is the process of using a representation from a trusted individual to prove that copies of documents are authentic reproductions of the original documents.

Where the documents are identification documents such as passports, certification is also used to ensure that the identification documents relate to the person presenting the document.

Certification is particularly important for non-face to face relationships where the risk of fraudulent documents may be greater than for face-to-face relationships.

IDR

IDR is an online platform where Know Your Client ("KYC") documentation can be uploaded and authenticated. All KYC checks are conducted remotely, and digital copies of original documentation are uploaded to customer profiles in order to identify and verify the customer including the customer's beneficial owners and controllers.

Digital Certification

Certification has historically been performed in 'wet ink' form by a licensed individual such as a lawyer, accountant or notary public. Physical copies of such documents were retained and stored by each institution.

The realities of modern business and technology has led regulators around the world to recognize the validity of equivalent safeguards in the digital world such as digital signatures.

IDR utilizes digital certification by sending a request to a suitable certifier via a system generated email. The certifier receives a mail with a link to the document and several options from which to choose.

Suitable Certifiers and Certification Criteria

A suitable certifier is a trusted third party who has seen the original document and in the case of a photographic identification document for a natural person, has also met the natural person.

IDR list of suitable certifiers is as follows:

- A director, officer or manager¹ of a regulated financial institution in a well-regulated jurisdiction such as one listed in Appendix C of the <u>Guernsey AML Handbook</u>²
- An accountant who is a member of a recognized professional body;
- A company secretary who is a member of the Institute of Chartered Secretaries and Administrators;
- A lawyer or notary public;
- An actuary;
- An embassy, consulate or high commission of the country of issue of the document; &
- A member of the judiciary, a senior civil servant, or a serving police or customs officer

Note: Documents cannot be certified by family members or relatives of the customer.

Practicalities

Wet Ink certification

IDR is a purely digital platform and does not store hard copies of original documentation and therefore certifies all documents digitally to negate the need to physically store documents.

IDR may at times receive soft copies of documents which have already been physically certified in wet ink. In order to avoid creating a chain of certifiers i.e., a certified copy of a certified copy, IDR will send the digital certification to the original wet ink certifier where possible. Where this is not possible, IDR will request a clean copy of the original document and request a digital certification for this copy.

An exception to this rule is where an Appendix C business as defined in the <u>Guernsey AML</u> <u>Handbook</u> receives a physical copy of the original document which has been certified in wet ink by a suitable certifier. An experienced employee of the Appendix C business may then certify that this is 'This is a true electronic copy of a certified copy of the original document which I have seen'. It is also possible for this certifier to certify as a 'true electronic copy of the original document which I have seen' where the certifier has seen the original document in addition to the certified copy.

It is also important to use common sense in such situations, for example, if the document is a certificate of incorporation, then the details, for example registration number and date of

¹ This includes compliance officers and money laundering reporting officers

² Where the regulated financial institution is a client of IDR and is certifying that it has received a 'wet ink' copy of the original document, the certification may come from more experienced staff involved in the gathering of AML/KYC documentation provided IDR confirms that the certifier fully understands the nature of the certification. The certifier should be of 'Senior Administrator' or 'Senior Analyst' level at a minimum

registration, may be verifiable on a website such as Companies House which would negate the need for certification.

Where digital certification is not possible for a legitimate reason, for example, if digital certification email requests are blocked in a given country, IDR Analysts should escalate to a Senior Analyst for a decision as to what is reasonable in the circumstances.

Documents Sourced Online

Documents sourced online from publicly available sources such as a government registry can be verified by IDR, certified as 'Publicly Sourced' and details of the URL and source recorded.

Documents sourced online from non-publicly available sources, for example documents purchased from a commercial registry, can often be verified on the registry website with the unique digital code provided on the document and therefore can be certified as true copies by IDR. Where this is not possible, such copies should be certified digitally by an external suitable certifier.

Ongoing Monitoring

For previously approved KYC profiles on IDR, it is not necessary to revisit certifications during a trigger event or ongoing monitoring review. If a certification was approved at the time of profile approval in accordance with the policies and procedures at that time, the certification can remain approved unless there is reason to doubt the authenticity of the document. Any new documentation requested must be done in accordance with current certification procedures.

Verification of Certifiers

IDR will need to verify the suitability of the certifier, and this can be done through a variety of methods such as verifying registration with a governing body for lawyers or accountants or verifying the regulated status of the firm for which they work.

In this exercise it is useful to compare the email address of the certifier with their work credentials, for example an accountant employed by ABC Accounting should have an email:

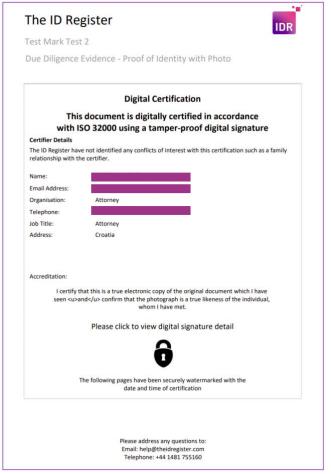
@abcaccounting.com or similar.

Where IDR is accepting a certification from an Appendix C regulated financial institution based on a wet ink certification, IDR should also be satisfied that the original wet ink certifier is suitable.

If IDR analysts have any reason to doubt the trustworthiness of the certifier, the analyst may conduct a search on the certifier for adverse media.

Tamper Proof Signature

Once IDR has verified the certifier, the certification will be approved, and a tamper proof digital signature and time stamp will be applied to the document.



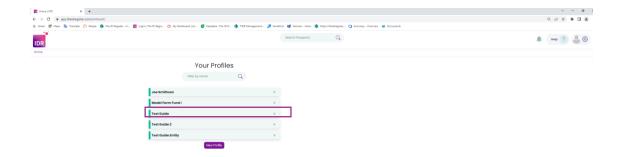
Certified 05/07/2022 12:48:14

ş

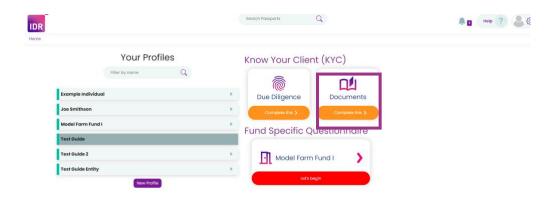
System Guidance

Getting to the Documents section

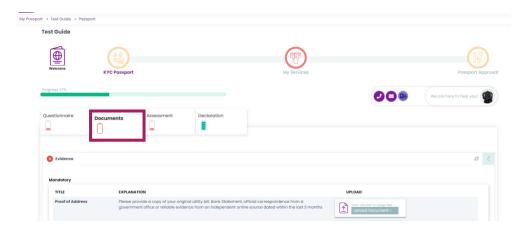
To get to the documents section click on the profile for which you need to certify the documents:



Next you need to click on the **Documents** button:

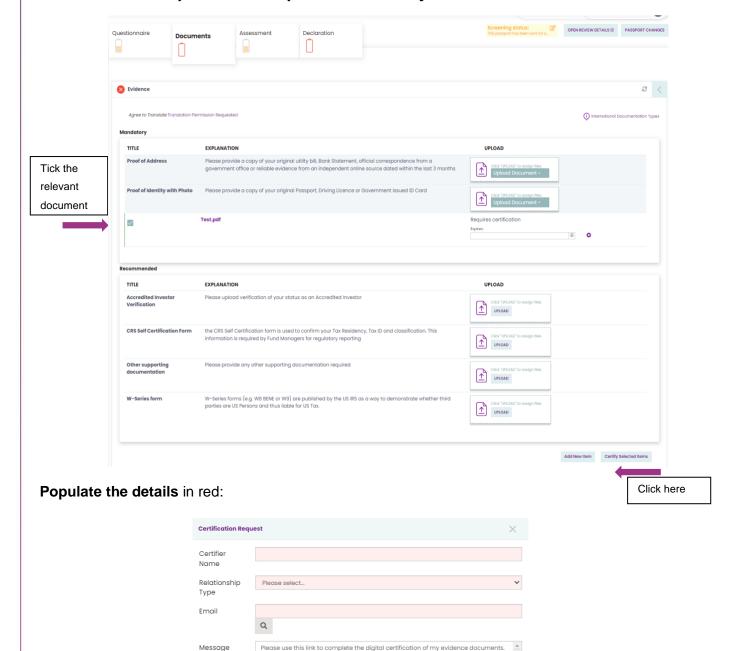


It will take you directly to the **Documents** tab of the selected profile:



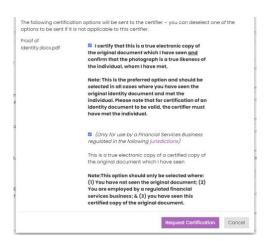
Sending a Certification Request

Select the document you wish to certify and click on 'certify selected items'.



For a photographic identification document, the following options can be sent to and selected by a certifier. You may choose to send just one of the two options to the certifier, for example, if you are aware that one of the options is not applicable in the circumstances.

Organisatio



- Option 1 should be selected in almost all cases.
- Option 2 should only be used where an Appendix C business has in its possession a copy
 of the original which has been certified in wet ink by a suitable certifier and the wet ink
 certifier has confirmed the points in option 1.

For all other documents, the following options can be sent:



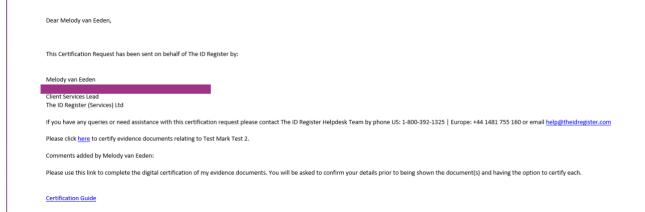
- Option 1 should be selected in almost all cases; this is where the certifier has seen the
 original documents.
- Option 2 should be selected where an Appendix C Regulated Financial Services Business
 has in its possession a copy of the original which has been certified in wet ink by a suitable
 certifier. Note: This option should only be selected where: (1) The certifier has not seen the
 original document; (2) The certifier is employed by a regulated financial services business;
 & (3) The certifier has seen this certified copy of the original document.

- Option 3 is where you certify that this is a true electronic copy of the document held by a regulated financial services business.
- **Option 4** is where you certify that this is an electronic copy of a document reviewed and held by a regulated financial services business and/or a service provider.

Once an option has been selected, it will be sent to IDR for review.

The certifier request

The certifier will receive an **email with the link** to the document:







www.idrgroup.com

IDR (Guernsey) Limited is authorised by the Guernsey Financial Services Commission to undertake Controlled Investment Business under license number 2693008. The ID Register is a trading name of The ID Register group of companies. IDR (Guernsey) Limited is registered in Guernsey with company number 68116. The ID Register (Guernsey) Limited is registered in Guernsey with company number and 60966. The registered address for each company is 5th Floor, Market Building, Fountain Street, St Peter Port, Guernsey, GY1 1BX.