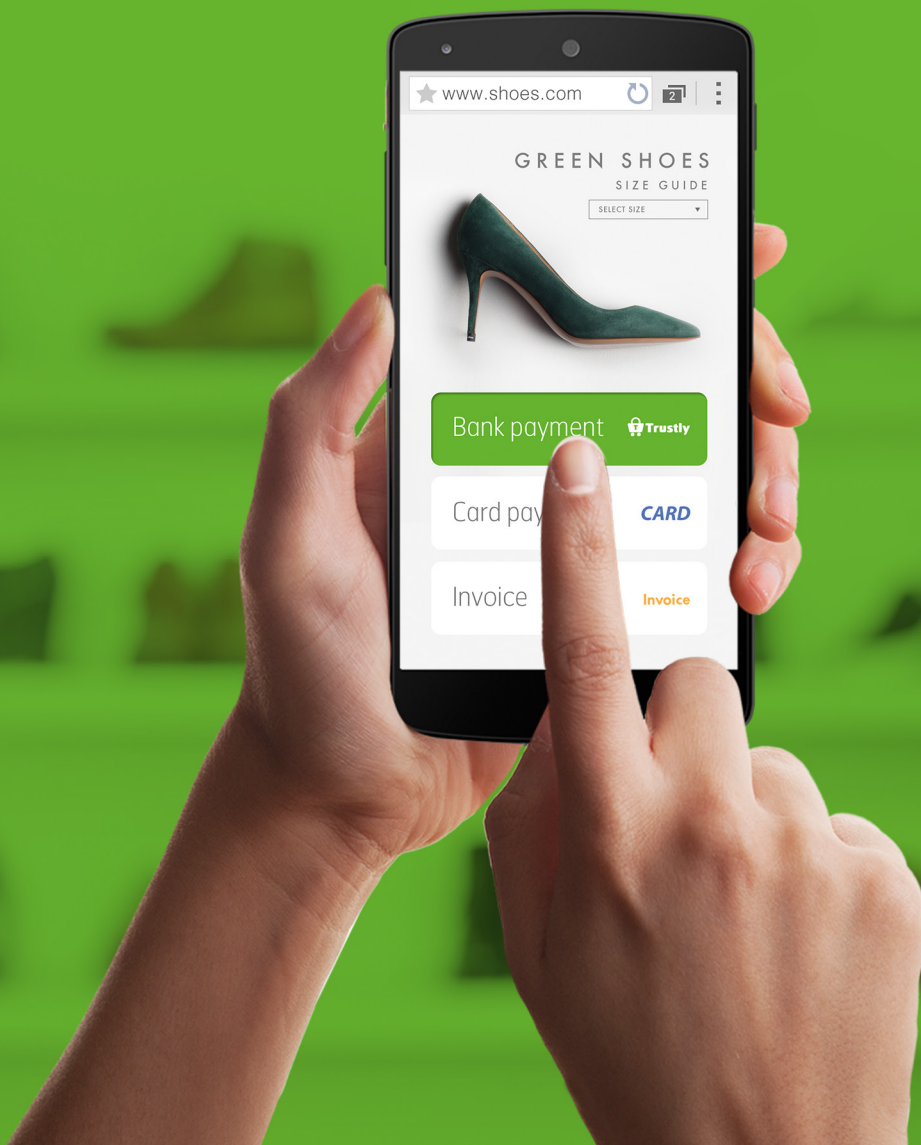




# Trustly Lean KYC

Product description

September 2018



Trustly's Lean KYC product supports merchants in fulfilling their regulatory KYC/CDD (Know Your Customer/Customer Due Diligence) requirements and preventing fraud by providing merchants with personal data, retrieved from the end user's online bank account. The personal data is delivered in Back Office or via API.



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## User verification

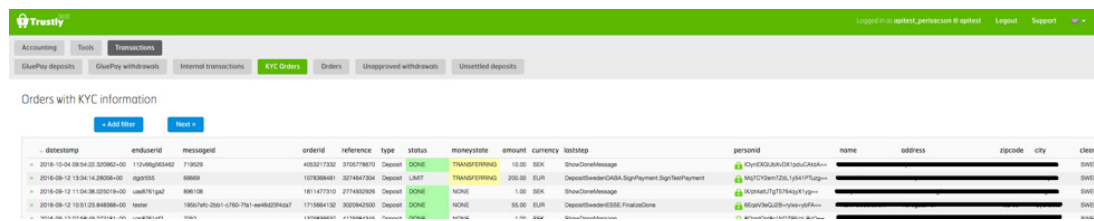
The Lean KYC product retrieve personal data from an end user who makes a payment to or receives a pay-out/refund from a merchant. Given that banks normally rely on some form of strong customer authentication, the fact that an end user can log into a certain bank account is a strong indication that he or she is who he or she claims to be.

The personal data can be used to verify, for example, that the name and date of birth of the end user matches the personal data the end user provided upon registration with the merchant. It can also be used to pre-fill fields on a form for streamlined registration.

The personal data for a specific end user is updated each time a payment is made and is thus always up-to-date.

# How the product works

- 1 The end user chooses Trustly to make a pay-in or a pay-out, or to share personal data from his or her bank.
- 2 The end user selects the bank, logs in and gives Trustly consent to collect certain personal data from his or her bank and forward such data to the merchant.
- 3 The end user selects which specific bank account to pay/retrieve personal data from/to (current, savings, etc.). The personal data is delivered in Back Office (see screenshot below) or via API.



## Personal data

Trustly can deliver personal data from all the markets where its products are offered, however the availability differs between markets, banks and end users, depending on availability of information in the end user’s bank. Trustly can provide the following personal data:

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Name	Personal ID	Date of birth	Address	Postal code	City
Masked bank account number					

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## Lean KYC for Gaming

Lean KYC is the basis for Trustly's Pay N Play, a gaming product that essentially eliminates the player sign-up process by combining the registration and deposit. For operators licensed by MGA (Malta Gaming Authority), the Lean KYC product makes it possible to fulfill MGA's KYC requirements on player verification. Trustly enables the operator (merchant) to download a PDF for each player who has made a deposit with Trustly. The PDF contains the following information:

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End user ID (assigned by merchant)	Gender	Method of verification (e.g. electronic signature)
Name	Address	Time of verification
Personal ID	Postal code	Bank
Date of birth	City	

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Each PDF is "issued" by Trustly with a Verification ID. The MGA has indicated that this method is a satisfactory means to comply with the requirements of the Remote Gaming Regulations concerning validation of a player's identity. To be used as the sole means for player verification, the PDF must contain all of the data points indicated above. Trustly can currently deliver a 95%+ coverage for Sweden, Finland, Estonia and Lithuania. We are continuously working to increase the coverage for other markets as well.

The Lean KYC product fulfills an operator's duty to identify players according to MGA's requirements. It does not, however, relieve an operator of its duties to fulfill requirements related to preventing money laundering and financing of terrorism.

## Business model

Lean KYC is offered at a fixed price per unique end user and month. The price also depends on the country where the end user's bank is, as the personal data availability varies between markets. Trustly's pricing structure is therefore tiered into the following Groups:

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Group A (high availability) – Countries where we collect the majority of personal data from the end user's online bank account, as well as from verified external sources. Charged full price.

Estonia      Finland      Lithuania      Sweden

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Group B (medium availability) – Countries where we collect some of the personal data from the end user's online bank account. Charged with a 50% discount of the full price.

Germany      Denmark      Latvia      Poland      Norway      Bulgaria      Italy

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Group C (low availability) – Countries where a scarce amount of personal data is available from the end user's online bank account. Product is free.

All other Trustly markets

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*Note: As the personal data available from banks changes over time, we reserve the right to move a country to another Group.*