

ANTI-MONEY LAUNDERING POLICY (AML POLICY)

Last update: 21.04.2021

This Policy is aimed to explain the goals, purposes and applicable practices implemented by GLTInvestment OÜ (registered office: Harju maakond, Tallinn, Kesklinna linnaosa, Roseni tn 13, 10111; registration code 16146912) (hereinafter – the «**Company**», «**we**») in preventing the use of trust-in-btc.com (hereinafter the «**Site**») for the purposes of money laundering.

This Policy is an integral part of the User Agreement, all terms and definitions used in this Policy that were not distinctly construed here shall be interpreted in the meaning specified in the User Agreement. If the User Agreement does not define this term either, this term is to be understood in accordance with the applicable law or generally accepted meaning.

1. WHAT IS AML and KYC?

Money laundering refers to the process of taking illegally obtained money and making it appear to have come from a legitimate source. It involves putting the money through a series of commercial transactions in order to “clean” the money. Anti-money laundering (AML) is a broad term for laws and regulations put in place to prevent criminals from making money illegally or moving illicit funds. While many illegal activities are targeted by AML laws, some of the most important are tax evasion, public corruption, and market manipulation.

KYC or Know Your Customer is the practice carried out by companies to verify the identity of their clients in compliance with legal requirements and current laws and regulations.

In addition to the KYC practice, there is also the KYT procedures. The aim of KYT (Know Your Transactions) is to identify potentially risky transactions and their underlying unusual behavior for detecting money laundering, fraud or corruption.

2. KYC/KYT MEASURES

As part of the implementation of KYC and KYT measures, the Company informs you that if there are grounds to believe that there are unlawful elements in the behavior or transactions of or involving a User, the Company may apply the following measures:

1. To require from the User additional information disclosing the origin of digital assets and/or confirming that these assets were not obtained by criminal means;
2. Block, if necessary, the client's account, transfer the necessary information to the law enforcement authorities at the place of registration of the Company and at the place of registration of the User;
3. Require the User to provide additional documents confirming the identity of the User, his physical existence and solvency;
4. To carry out the withdrawal of digital assets only by the details from which the transfer was made, in case the User is not able to confirm the withdrawal using the secret word;
5. Refuse the client in the withdrawal of third-party details;
6. Request confirmation of the ownership of the input source of digital assets to the User in the form of the Company (payer verification procedure);

The company reserves the right to monitor the entire chain of transactions, in order to identify suspicious transactions or transactions that are difficult or impossible to track the entire chain of movement of digital assets from the moment of their appearance. In this case, the Company reserves the right to refuse in providing the Service to the User if the Company has reasonable suspicions about the legality of the origin of these digital assets.

Unless otherwise required by law, the User will be notified of the actions taken when funds are frozen or the Personal Account is blocked. Please note that the Company shall not be liable and shall not be obliged to compensate the User for any losses and damages (actual damage or loss of profit) incurred in connection with the measures taken.

If you have any questions regarding the provisions of this Policy, please contact us at support@trust-in-btc.com

GLTInvestment OÜ

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