

# Compliance Introduction For Clients, Owners And Other Relevant Persons.

The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (MLR 2017) introduced the requirement for the completion of due diligence on the Clients, Owners and other relevant persons following the changes in the Fifth Money Laundering Directive.

Global 1 are required to conduct Due Diligence in accordance with MLR 2017. In order to protect your privacy, we will redact documents to remove any information that is often not necessary for the purposes of CDD, or which relates to third parties. We will require (but are not restricted to) the following documentation to complete our CDD procedures:

## What we need

### **For private individuals, please provide**

- Coloured copy of Passport / ID of the Legal Owner
- Proof of address (utility bill, bank statement etc..)\*

\* The document must not be printed off the internet and must be dated in the last 3 months.

### **For UK corporate entities**

- Coloured copy of Passport / ID for all authorised signatories and any shareholders who own more than 25% shares:

### **For corporate overseas companies**

- Certificate of Incorporation
- Memorandum and Article of Association
- Register of Directors (and valid photo ID for key/influential directors)
- Register of Shareholders/Members (also required for all corporate shareholders who own more than 25%)
- Valid photographic ID for any shareholders who own more than 25%
- Original Trust Deed and deeds of amendments (if applicable)
- Confirmation of authorised signatories and IDs for all signatories

## **Certification**

All documents must be certified by a Global 1 member of staff on seeing the originals or by an authorised person who must send certified documents directly to Global 1. An authorised person is a member of an institute or other professional organisation that is required to abide by AML regulations (i.e. a regulated solicitor, qualified accountant or registered notary). The certification should confirm:

- The certifier has seen the original document and that it is a true copy and true likeness
- Name of certifier
- Contact telephone number and email address of certifier
- Formal stamp or official seal from the certifier's organisation confirming their professional capacity
- Date of certification

## **Why we need it**

Money laundering is a global requirement that affects all countries in varying degrees. As a company conducting luxury lifestyle business we are required to comply with all applicable anti-money laundering regulations. As Global 1 are headquartered in the UK, our CDD procedures are based on the Agency Guidance for Money Laundering Supervision published by Her Majesty's Revenue & Customs (HMRC). To comply with our regulatory requirements, we are required to verify the identity and address of our tenants, permitted occupier, guarantor and other relevant persons.

## **What will we do with your information**

All data that we hold about you as an individual (your "Personal Data") will be held and processed by Global 1 strictly in accordance with all applicable data protection legislation. Global 1 will only use your Personal Data for the purposes for which it is collected and only retain it for as long as reasonably necessary to fulfil such purposes.

Accordingly, any information you provide to us for completing our Due Diligence procedures will be used solely for this purpose, unless you instruct us otherwise. Unless we have your consent or instructions to do so, we will not share your personal information with any third party except where (1) such sharing is a necessary part of the activities that we undertake, or (2) such sharing is necessary to comply with our legal obligations.



We will process your Personal Data using our own systems and, as appropriate, share such information with our third party service providers for the purposes of information verification and validation.

It is your legal right to obtain further information from us concerning your Personal Data, including a description of the data we hold and how we use it. Upon request we will provide you with a copy of our Privacy Policy. Should you have any queries concerning data protection or your Personal Data, please contact the Global 1 member of the team at [info@theglobal1.com](mailto:info@theglobal1.com)