

## ANTI-MONEY LAUNDERING AND COUNTERING FINANCING OF TERRORISM

E3 Business Accountants Ltd is required to comply with the Anti-Money Laundering and Countering Financing of Terrorism Act 2009 (AML/CFT Act). The law requires us to carry out customer due diligence in accordance with the AML/CFT Act.

### WHAT IS CUSTOMER DUE DILIGENCE?

The AML/CFT Act requires E3 Business Accountants Ltd to conduct customer due diligence on a client, any beneficial owner of a client or any person acting on behalf of a client before we commence acting for that client where the client has requested that we act in relation to certain captured activities (as defined in the AML/CFT Act).

If we need to complete customer due diligence before we act for you, the information and supporting documents we require will depend on the nature of the work we have been asked to carry out. As such, we are required to obtain personal information for all new clients and update and confirm information we may have for current clients. This personal information will be:

- Full name
- Date of birth
- Residential address

Please note that we may be required to carry out customer due diligence before we act for you, even though we may have been acting for you for many years as the nature of the work we customarily carried out for you may have changed.

### OUR PROCESS

For clients in New Zealand and Australia, we use an electronic verification system called APLYiD to collect the necessary due diligence information and supporting evidence about persons in your business. You can visit [www.aplyid.com](http://www.aplyid.com) to validate that this is a reputable online process. For more information about this process, and the information collected by APLYiD, please see the section entitled 'APLYiD' below.

Alternatively, we can verify your information in person or via a trusted referee. For more information on the documentation that we accept, please contact the AML/CFT compliance team at E3 Business Accountants Ltd on 03 379 2343 or [office@e3accountants.co.nz](mailto:office@e3accountants.co.nz)

### HANDLING YOUR INFORMATION

Any personal information that E3 Business Accountants Ltd collects as part of the customer due diligence process will be used exclusively for the purpose of ensuring that we meet our obligations under the AML/CFT Act and will be held in accordance with our Privacy Policy.

## APLYiD

APLYiD uses biometrics, OCR (optical character recognition) and trusted data sources to confirm a person's identity, the legitimacy of a person's identification and their residential address.

### How to use APLYiD

To use APLYiD, you will need a smart phone and a driver licence or passport.

The process of verifying your personal information is as follows:

E3 Business Accountants Ltd will send you a text message, which includes a link to start the APLYiD process. The process does not require you to download any apps onto your phone. You simply click on the link contained in the text message

You will be prompted to take photos on your smart phone of your New Zealand or Australian driver licence or passport

APLYiD extracts information from the photos you have taken and gives you the opportunity to correct any errors  
You will be prompted to enter your current residential address

You will be prompted to take a short video of yourself (front and side of your face), which the APLYiD system matches against the photo on your driver licence or passport

APLYiD will check the information you have provided against various sources, including:

- databases of government and financial institutions in New Zealand and Australia
- international databases of Politically Exposed Persons (as that term is defined in the AML/CFT Act) and sanctions

APLYiD will produce a report for E3 Business Accountants Ltd's AML/CFT compliance team to review and download.

Please note that we may have to request further information from you in certain circumstances.

## Collecting, handling and deleting your personal information

E3 Business Accountants Ltd's uses APLYiD to verify and identify individuals.

Once you have completed the APLYiD process, our AML/CFT compliance team will download a report produced by APLYiD and save this in our systems. The information in the APLYiD report may include the following personal information:

Information from your driver licence or passport, including your photo

Your residential address and phone number

A screenshot (photo) from the short video you have taken

A summary of databases which APLYiD searched

Whether you passed or failed APLYiD's identify verification process.

E3 Business Accountants Ltd holds any personal information in accordance with our Privacy Policy.

Once our AML/CFT compliance team has downloaded an APLYiD report, APLYiD will delete all personal information it has collected from you and then archive the record within five minutes of the download. The archived data in APLYiD includes a reference number, but no personal information. Even if no report is downloaded, APLYiD will automatically delete any personal information seven days after you have completed the APLYiD process.

APLYiD's system is hosted on Amazon Web Services in Sydney, Australia. APLYiD's privacy policy can be found [here](#).

## Questions

If you have any questions about the customer due diligence process or the information you might be required to provide to us, please get in touch with our AML/CFT compliance team on 03 379 2343 [office@e3accountants.co.nz](mailto:office@e3accountants.co.nz)