**Know Your Customer (KYC)/Customer Due Diligence (CDD) Policy**

Purpose: The purpose of KYC/CDD is to prevent financial services providers from being used, intentionally or unintentionally, by criminal elements for money laundering activities. KYC/CDD policies enable financial` services providers to know or understand their customers and their financial dealings.

Overview: The KYC/CDD Policy identifies the specific customer and transaction information collected and recorded, as well as the verification of customer identification and government filings in accordance with regulatory expectations.

Summary: smartcashpay (“Smartcashpay”) collects and records certain information from every customer that completes a transaction; utilizes a risk-based approach to verify the identity of certain customers; and records transaction information, customer identification, and verification methods. Smartcashpay has implemented a tier system based on transactional amount to determine, at minimum, the pieces of information and identification to be collected and verified. Additionally, Smartcashpay leverages this information to perform OFAC and other watchlist screening of all customers, as well as CTR filings for transactions in excess of $10,000.

In situations where either a customer or SMARTCASH address is party to multiple transactions within a single business day, Smartcashpay will aggregate the transactions and apply the aggregated amount to its tier system.

Exceptions: Smartcashpay will not grant any exceptions to its KYC/CDD Policy.

Smartcashpay will not execute the customer-requested transaction under the following circumstances: (1) The customer is unable to present an unexpired government-issued photo identification when required, (2) Smartcashpay is unfamiliar with the type of identification presented, or (3) when Smartcashpay is otherwise unable to verify the true identity of the customer.

Details: The KYC/CDD tiers are as follows.

**Tier 1 (transactions <$300)**

Smartcashpay will collect and record the following information from any customer that completes an exchange of U.S. Dollar-denominated cash for SMARTCASH-denominated cryptocurrency or, conversely, an exchange of SMARTCASH-denominated cryptocurrency for U.S. Dollar-denominated cash in amounts less than $300.

1. Full Name
2. Phone Number
3. Address (including zip code)
4. SMARTCASH Wallet Address
5. Transaction Amount (U.S. Dollar; SMARTCASH)
6. Transaction Date
7. Transaction Time
8. Transaction Location

Additional action(s):

(I) OFAC and other watchlist screening  
  
**Tier 2 (transactions $300 - <$1,000)**

Smartcashpay will collect and record the following information from any customer that completes an exchange of U.S. Dollar-denominated cash for SMARTCASH-denominated cryptocurrency or, conversely, an exchange of SMARTCASH-denominated cryptocurrency for U.S. Dollar-denominated cash in amounts ranging from $300 to <$1,000.

(1) Full Name   
(2) Phone Number   
(3) Address (including zip code)  
(4) SMARTCASH Wallet Address   
(5) Transaction Amount (U.S. Dollar; SMARTCASH)  
(6) Transaction Date   
(7) Transaction Time  
(8) Transaction Location  
  
Additional action(s):

(I) OFAC and other watchlist screening   
(II) Review blockchain explorer data

**Tier 3 (transactions $1,000 - $10,000)**

Smartcashpay will collect and record the following information from any customer that completes an exchange of U.S. Dollar-denominated cash for SMARTCASH-denominated cryptocurrency or, conversely, an exchange of SMARTCASH-denominated cryptocurrency for U.S. Dollar-denominated cash in amounts ranging from $1,000 to $10,000.

(1) Full Name  
(2) Phone Number  
(3) Address (including zip code)  
(4) Date of Birth  
(5) Tax Identification Number  
(6) Government-issued identification, unexpired  
(7) SMARTCASH Wallet Address   
(8) Transaction Amount (U.S. Dollar; SMARTCASH)  
(9) Transaction Date  
(10) Transaction Time  
(11) Transaction Location

Additional action(s):

(I) OFAC and other watchlist screening   
(II) Review blockchain explorer data   
(III) Verification of customer information, including identification

**Tier 4 (transactions >$10,000)**

Smartcashpay will collect and record the following information from any customer that completes an exchange of U.S. Dollar-denominated cash or, conversely, an exchange of SMARTCASH-denominated cryptocurrency for U.S. Dollar-denominated cash in amounts greater than $10,000.

(1) Full Name  
(2) Phone Number  
(3) Address (including zip code)  
(4) Date of Birth  
(5) Tax Identification Number  
(6) Government-issued identification, unexpired  
(7) SMARTCASH Wallet Address   
(8) Transaction Amount (U.S. Dollar; SMARTCASH)  
(9) Transaction Date   
(10) Transaction Time  
(11) Transaction Location  
  
Additional action(s):

(I) OFAC and other watchlist screening   
(II) Review blockchain explorer data   
(III) Verification of customer information, including identification   
(IV) Filing of a Currency Transaction Report (“CTR”)

Summary: The table below identifies the customer information, transaction information, verification, and additional actions conducted within the four (4) KYC/CDD tiers, as detailed above.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
|  | *Collected / Recorded Information* | **Tier** | | | |
| **1** | **2** | **3** | **4** |
| *Customer*  *Information* | Full name | ☑ | ☑ | ☑ | ☑ |
| Phone number | ☑ | ☑ | ☑ | ☑ |
| Address | ☑ | ☑ | ☑ | ☑ |
| Date of Birth |  |  | ☑ | ☑ |
| Tax Identification Number |  |  | ☑ | ☑ |
| Government ID |  |  | ☑ | ☑ |
| *Transaction*  *Information* | SMARTCASH address | ☑ | ☑ | ☑ | ☑ |
| Amount | ☑ | ☑ | ☑ | ☑ |
| Date | ☑ | ☑ | ☑ | ☑ |
| Time | ☑ | ☑ | ☑ | ☑ |
| Location | ☑ | ☑ | ☑ | ☑ |
| OFAC and other watchlist screening | | ☑ | ☑ | ☑ | ☑ |
| Review blockchain explorer data | |  | ☑ | ☑ | ☑ |
| Verification of customer information | |  |  | ☑ | ☑ |
| CTR filing | |  |  |  | ☑ |

Records: Smartcashpay will retain the aforementioned records relating to its KYC/CDD Program and any supporting records. Smartcashpay will retain these records for at least five (5) years after the date of transaction. These records will be filed or stored in such a way as to be accessible within a reasonable period of time.

Approval: Smartcashpay’s Senior Management has approved the KYC/CDD Policy. This approval is indicated by the signature below.

Signed:

Name:

Title:

Date: