

FIU Denmark's guide for reporting entities and persons

September 2023







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What is GoAML

GoAML is a system for reporting suspected financial crime. If you are a company or person subject to a reporting requirement pursuant to the Money Laundering Act, you can report suspected money laundering or financing of terrorism to the Danish Financial Intelligence Unit (FIU) via GoAML.

There is not open access to goAML. This means that you and your organization must have a user to be able to report the Danish FIU of suspected money laundering. The first step is therefore to create a user for your organisation.

Register in GoAML

You must create a user in GoAML for you or your organization in order to send reports to FIU Denmark about suspected money laundering.

How do you register in GoAML

If you are reporting on behalf of an organization that is not registered with GoAML, you must first register the organization. If you are reporting on behalf of an organization registered in GoAML, you must register as a user associated with your organization. If you are not reporting on behalf of an organization, you can register as an individual user.

REGISTER AN ORGANISATION IN GOAML

1 Choose organisation type

First, you need to choose your organisation type. You have the following options:

Register an Organisation







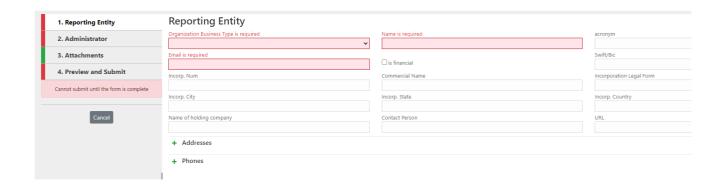
- Reporting Entity: Your organization is required to report suspicious activities that may indicate money laundering or terrorism financing.
- Supervisory body: A specific industry that needs to see aggregate statistics on the industry's reporting capability, but does not need to report suspicious circumstances.
- Stakeholder: organisations working in money laundering prevention who are not required to send reports pertaining to suspicious activities.

2 Fill in relevant information

The relevant information about your organization must then be filled in: name, address, CVR number, etc.

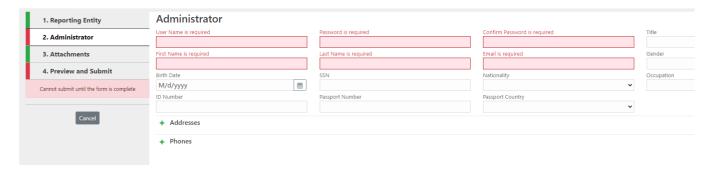
The organisation's business type must be filled in with a provision from Section 1, no. 1-24 of the Money Laundering Act which best covers the organisation's activities.





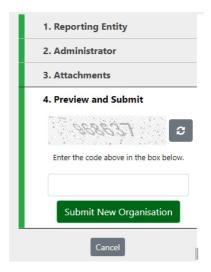
3 Fill in information about the first administrator user

By pressing 2. Administrator on the left side, the organization's first administrator user must be filled in. This field must be completed in the same way as the other persons who will be associated with your organization. An example of the registration form can be seen below. In addition, choose a password and a username. The chosen password and username will become your future login details.



4 Complete the CAPTCHA

Finally, by pressing 4. Preview and submit on the left side, the CAPTCHA must be completed. This is an anti-hacker and digitizing system which works by using an image of numbers with scrambled text. If you receive an error message, you must refresh the page and fill in the CAPTCHA again.





5 Await approval from the Danish FIU

Your request has now been sent and is awaiting approval from the Danish FIU.

REGISTER A USER WITH AN EXISTING ORGANIZATION IN GOAML

1 Choose User (Reporting Entity)

If your organization is registered and approved in goAML, you can register a user associated with your organization. New users are registered on the goAML website. Press User (Reporting Entity) at the bottom left of the page to request user registration.

Register a User



2 Fill in relevant User info

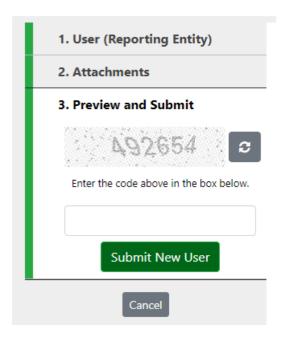
You will be taken to a registration form which must be completed in order to submit the request. Fields marked in red are mandatory. To link the new user to the organization, the organization's ID must be noted in the Organizations ID field. The organization's ID no. can be found by another user or administrator who is logged into goAML, in the menu under MY GOAML \rightarrow My organization information \rightarrow Organization ID.

1. User (Reporting Entity)	User (Reporting Entity)			
2. Attachments	Organization ID is required	User Name is required	Password is required	Confirm Password is required
3. Preview and Submit	Title	First Name is required	Last Name is required	Email is required
Cannot submit until the form is complete	Gender	Birth Date	SSN	Nationality
Cancel	Occupation	M/d/yyyy	Passport Number	Passport Country
	+ Addresses			
	+ Phones			

3 Complete the CAPTCHA



Finally, by pressing 3. Preview and submit on the left side, the CAPTCHA must be completed. This is an anti-hacker and digitizing system that works by using an image of scrambled text or numbers. If you receive an error message, you must refresh the page and fill in the CAPTCHA again.



4 Await approval

Your user request has now been sent and is awaiting approval by your GoAML administrator.

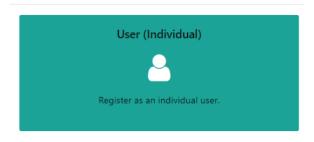
The organization must approve new users themselves, under $ADMIN \rightarrow User$ -Request Management. Here, under Request Status, the administrator can click on <u>Waiting for RE admin to verify</u>, after which a form with all the information the user has entered is visible.

If the information appears valid and the user belongs to the organization, the administrator can press **Finalize**. The user will then be able to log in to the GoAML website.

REGISTER AN INDIVIDUAL USER

1 Choose User (Individual)

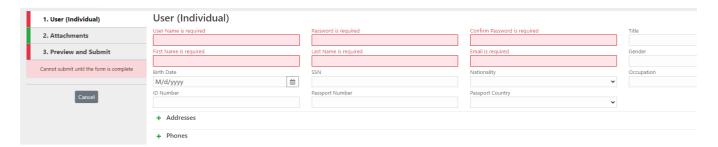
If you do not want to be associated with an organization in GoAML, you can register an individual user. Press User (individual) at the bottom right of the front page to request user registration.





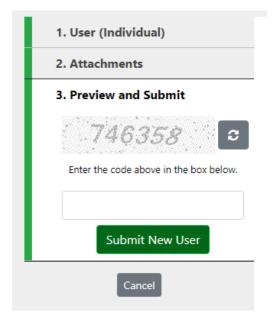
2 Fill in relevant User information

You will be taken to a registration form which must be completed in order to submit the request. Fields marked in red are mandatory.



3 Complete the CAPTCHA

Finally, by pressing 3.Preview and submit on the left side, the CAPTCHA must be completed. This is an anti-hacker and digitization system that works by using an image scrambled text or numbers. If you receive an error message, you must refresh the page and fill in the CAPTCHA again.



4 Await approval from the Danish FIU

Your request has now been sent and is awaiting approval from the Danish FIU.

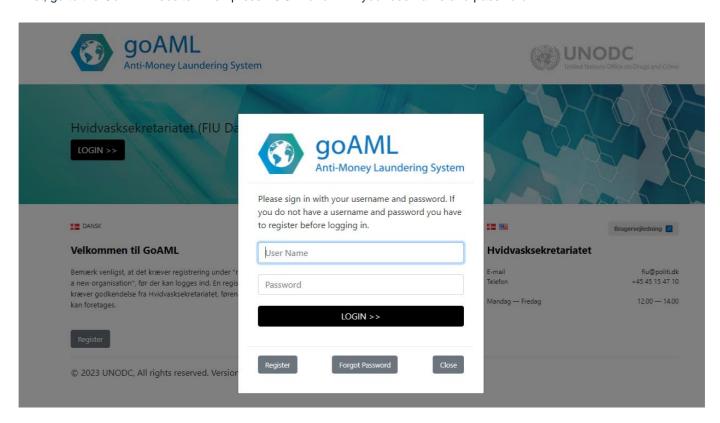


Login to GoAML

HOW TO LOGIN TO GOAML

1 Login to GoAML with username and password

First, go to the GoAML website. Then press LOGIN and fill in your username and password.



If you have forgotten your password, you can press *Forgot Password* where you will be taken to a page to reset your password.

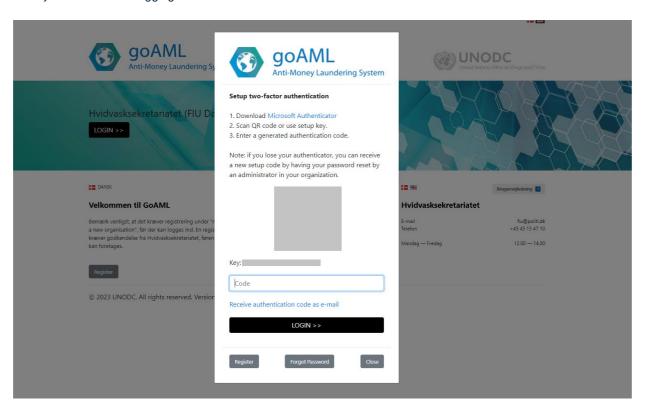


If you have forgotten your username, you must contact FIU Denmark at fiu@politi.dk

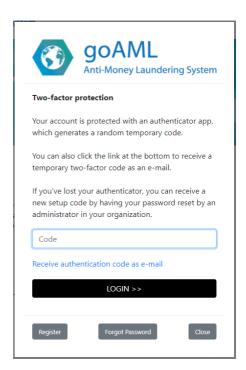


2 Two-factor authentication via mobile app

If you haven't set up your two-factor authentication via mobile app, you'll see the following. To start the setup, scan the QR code you receive after logging in.



After setting up the mobile app for two-factor authentication, insert the generated authentication code.



If you change your phone or need to set up two-factor authentication again, you can get a new setup code by having your password reset by an administrator of your organization



3 Two-factor authentication via e-mail

You can always receive a two-factor code in your email by pressing Receive authorization code by email.



This code is automatically sent to the registered e-mail address, and it may therefore take a few minutes before the e-mail is received.

If you're having trouble with the two-factor verification code, it could be because:

- · The wrong e-mail address is registered to the user account
- The e-mail is sorted into a spam/junk folder by the user's e-mail client
- The e-mail is received too late due to the settings in the user's e-mail client.

You will then receive the following automatic email with a two-factor verification code. Note that the code is no longer valid if it is entered incorrectly or 15 minutes after it is created.



Enter the verification code that you received by email.

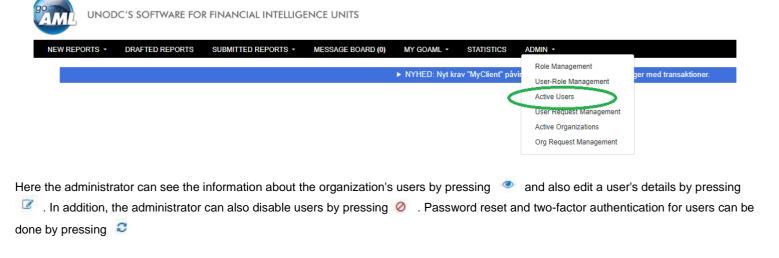




User rights and management

Each role defines specific permissions for GoAML. These roles are assigned to user accounts and thus define the users' permissions.

The GoAML administrator of the organization can see an overview of all the users associated with the organization under *ADMIN* → *Active users* from the menu.



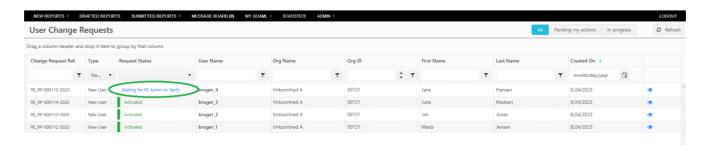
FREQUENTLY ASKED QUESTIONS ABOUT USER RIGHTS AND ADMINISTRATION

How to approve new users

The organization must approve new users themselves, under ADMIN → User Request Management.

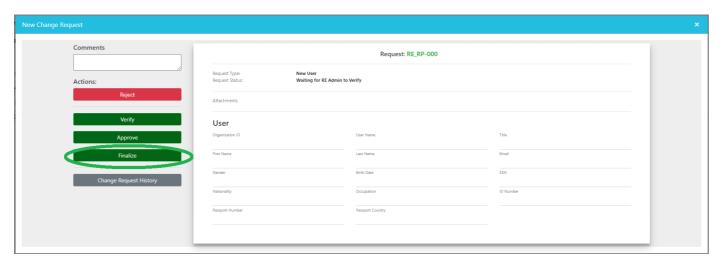


Here, under Request Status, the administrator can press 'Waiting for RE Admin to Verify', after which a form with all the information the user has entered is visible.





If the information appears valid and the user belongs to the organization, the administrator can press **"Finalize"**. The user will then be able to log in to the GoAML website.



Administrator no longer employed at organisation

If an organization no longer has a registered administrator employed, they lose access to GoAML and the authorization of new users. The organization must therefore contact FIU Denmark at **fiu@politi.dk** from an official e-mail address for the organization.

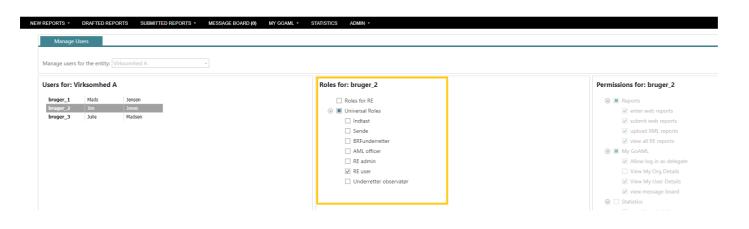
The organization must avoid losing access to administration of GoAML by always having a minimum of 2 employed administrators. Administration rights are assigned to the organization's users in GoAML.

If you are an administrator for an organization, you can manage rights by going to: *ADMIN* → *User role management* in the GoAML menu.



Users with the <u>RE Admin</u> role have rights to administer the organization, as well as to assign administrative rights to other users in the organization.





Organisation has changed email address

If an organization no longer has access to the email address registered to their GoAML account, they cannot receive two factor verification codes, and therefore lose access to GoAML. The organization must therefore contact FIU Denmark at fiu@politi.dk from an official e-mail address for the organization.

The organization must avoid losing access to GoAML administration by always keeping their registered email addresses current. This applies to both the organization and its users, in that changes in the organization's internal e-mail addresses are often the responsibility of all users.

If you are an administrator for an organization, you can change the organization's e-mail address by going to: $MY GOAML \rightarrow My Org$ Details information in the GoAML menu.



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If you are a user but not an administrator, you can change your registered e-mail address by going to: $MY GOAML \rightarrow My User Details$ in the GoAML menu.





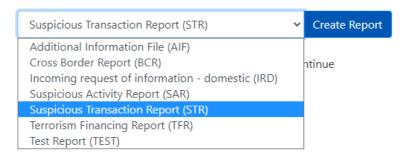


What type of report should I create?

When reporting, you must choose the type of report that suits your grounds for suspicion and the information you have available.

If you do not have information about a transaction, complete a Suspicious Activity Report (SAR). If you want to report a transaction involving an account, it requires a bank account number, and not other types of account number.

Select a report type



The relevant type of report is selected on the basis of information that the reporting party has in its possession.

FIU Denmark observes particular examples of SAR reports, that should have been created as STR reports instead, as those subject to report include transactions in Excel format as attachments. The key difference between a STR report and a SAR report is the basis of suspicion. For a SAR report, the basis for suspicion is behavior and not a transaction, while the basis for a STR report is one or more transactions. To this end, transactions must be understood as all types of transactions.

Suspicious Transaction Report (STR)

This type of notification is used when you suspect that a transaction is involved in money laundering and you have the corresponding bank account information. When reporting this type of report, you must fill in the sender and receiver in the transaction, where at least 1 of the parties must be marked as (My Client).

Suspicious Activity Report (SAR)

This type of report is used when you suspect that an activity is involved in money laundering, or suspect a transaction but with missing bank account information. When reporting this type of report, you must not include or attach transaction information.

Terrorism Financing Report (TFR)

This type of report is used when you suspect that a transaction is involved in terrorist financing and you have the corresponding bank account information. When reporting this type of report, you must fill in the sender and receiver in the transaction, where at least 1 of the parties must be marked as (My Client).

Additional Information File (AIF)

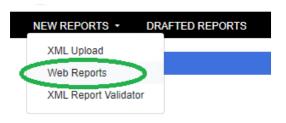
This type of report is used when you have reported suspicious transactions and will add additional transactions to your original report. When reporting this type of report, the supplementary transactions are linked together with the transactions from the original notification. In this report, you must provide a Reference ID from the original report you reported.



Report with Transactions information (STR, TFR, AIF)

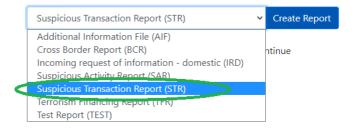
A STR is a report of possible money laundering involving transactions between persons or companies, cash withdrawals or cash adjustment.

A STR (or TFR, AIF) report is created through the web form on the GoAML website. Press New Report in the menu and then select Web Report.



Then select Suspicious Transaction Report (STR) and follow the steps below.

Select a report type



HOW TO COMPLETE AN STR REPORT

1 Introductory information about the report

The reporting party is directed to enter the relevant reporting entity branch, the reporting party's internal case number for a report, the reference date and the FIU reference.

Reporting Entity Branch	Reporting Entity Reference	Report Date	FIU Reference
		m	
Previously Rejected Report Ref Number			

What should I enter in the various fields?

- Reporting Entity Branch The reporting entity's branch
- Reporting Entity Reference The reporting entity's internal case number
- Report Date (Obligatory) The date the report is sent to FIU Denmark
- FIU Reference Can be used to identify previously submitted report by the person obliged to report regarding the same customer relationship or otherwise related to the current report



2 Reason for suspicion

Thereafter, the grounds fo	or suspicion should be	filled in, in the 'Reason'	box
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Reason			

An adequate and detailed basis for suspicion is essential for a good report.

It is important that reports to FIU Denmark contain all relevant information. This means, for example, that the accounts, persons and companies involved must, as far as possible, be identified and described in the reason for suspicion.

The reason for suspicion must consist of a minimum of 100 characters, otherwise the report will be rejected upon submission to the FIU Denmark.

3 Action

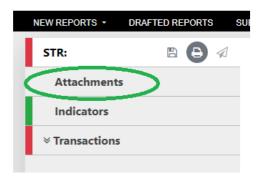
When the reason for suspicion has been filled in, the reporting party will see the Action field.



The Danish FIU recommends that the reporting party states which specific actions the reporting party has taken in relation to the customer to whom the suspicion relates. It could be, for example, that the reporting party has stopped a transaction, terminated a customer or the like.

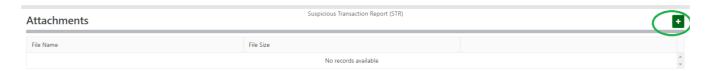
4 Attachments

After this, the next step is to go to Attachments. This is not obgliatory.





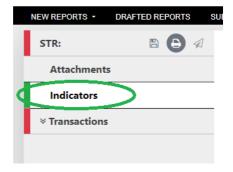
The reporting party is then directed to the field below, where attachments can be attached. Attachments are added by clicking on the green button in the right corner.



The reporting party may choose to attach attachments to reports. The appendices can, for example, consist of the reporting party's own analysis of a suspected person or company, surveillance material from an ATM, an ID card that identifies the person concerned, work contracts, email correspondence or other relevant material that can support the suspicion.

5 Indicators

After this, the next step is to click on 'Indicators', so that the right indicator codes that are relevant to the report can be selected.



The next step is to select the indicator codes that fit the report.

Indicators Select Indicators from the table below Code 1 Indicator A01 A01 - Customer hesitates to give information A02 A02 - Customer refuses to give information A04 A04 - Customer is usually difficult to get in contact with A05 A05 - Imprecise address and the informed address does not correspond with the address stated in the National Register A06 - Frequent change of telephone numbers and use of omitted telephone numbers A06 A07 A07 - Unusual/frequent change of commitments for instance change from major to minor banks A08 A08 - A change over time in personal attitude and a sudden aversion to receive interests A09 - Customer is accompanied by and/or instructed by a third party A10 - Representative of a company/association seems uncertain or without any commercial expe A11 - A complexed company structure which apparently serves no logical purpose A12 A12 - Company/association has no clear or logical purposel



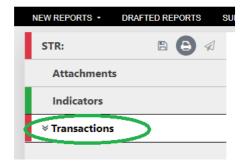
Which Indicator code should I chose?

FIU Denmark recommends that the reporting party selects the indicator code(s) that best suit the report.

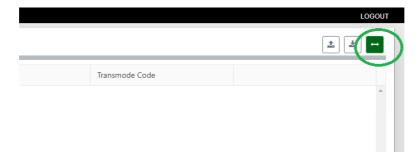
If the reporting party cannot place the suspicion within the established indicator codes, the Danish FIU recommends the indicator code '001 - Other' be selected. If the reporting party does not select an indicator, the report is automatically rejected by goAML.

6 Add transactions

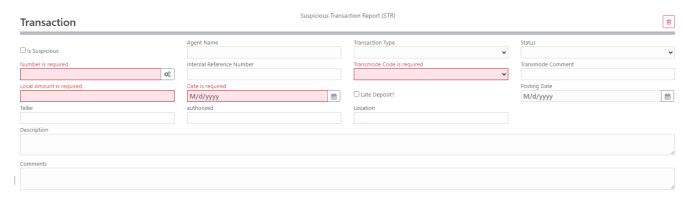
When the reporting party has selected one or more indicator codes for a STR notification, then click on to Transactions.



The reporting party is now directed to complete Transactions. The reporting party must click on the green icon in the upper right corner to fill in information about a transaction.



The following will then appear:





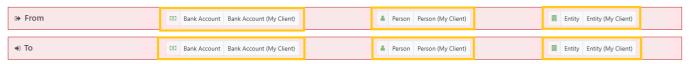
What should I enter in the various fields?

- Is Suspicious Can be clicked if the specific transaction is suspicious
- Agent Name Agent name of the reporting agent, in the case of remittance agencies, when the report is made by the main service provider
- Transaction Type The type of transaction in question
- · Status The reporting party can choose here what the status of the transaction is
- · Number (Obligatory) Auto Generated Transaction ID (click on the icon for auto generation)
- · Interal Reference Number The reporting party's internal reference number of the transaction
- Trasmode Code (Obligatory) The type of transaction in the form of, for example, bank transfer, cash deposit, currency exchange, etc.
- Transmode Comment The reporting party's comment on a transaction type that is not explained in any other way in the other fields
- · Local Amount (Obligatory) The amount of the transaction in DKK
- · Date (Obligatory) Date of the transaction
- · Late Deposit? Do not fill in this field if it is not a late deposit
- · Posting Date The day the transaction took place
- · Location For example, the location of the branch that has approved or observed a suspicious transaction or behavior
- Description The field can be used to expand details regarding the transaction
- · Comments Any comments regarding the transaction can be inserted in this field

7 Complete transaction information

When the fields in "Transactions" have been filled in, persons, companies and/or bank accounts must be linked. Therefore, it must be stated in the "Transactions" fields under "From" and "To", who the transaction is from and to whom the transaction is going. To this end, one of the parties in either "From" or "To" must be a customer of the reporting party who prepares the report, which is why "MyClient" must be selected in one of the categories.

"(MyClient)" - can be a bank account, person or company, and can be selected at both ends of a transaction.



⁺ Goods and Services

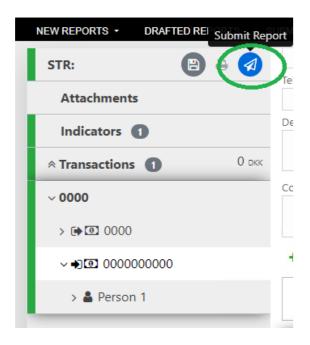
Which category should I choose?

- From The sending party of a transaction
- To The receiving party of a transaction
- Bank Account An account involved in suspicious transactions or suspicious financial behavior that is not a customer of the financial institution making the specific report
- Bank Account (MyClient) An account involved in suspicious transactions or suspicious financial behavior that is a customer of the financial institution making the specific report
- *Person* A person who carries out suspicious transactions or engages in suspicious financial behavior who is not a customer of the financial institution making the specific report
- Person (MyClient) A person who carries out suspicious transactions or has suspicious financial behavior who is a customer of the financial institution making the specific report
- Entity A company that carries out suspicious transactions or has suspicious financial behavior that is not a customer of the financial institution that makes the specific report
- Entity (MyClient) A company that carries out suspicious transactions or has suspicious financial behavior that is a customer of the financial institution that makes the specific report



8 Submit Report

When the reporting party has completed the report and is ready to send it to FIU Denmark, click on the small paper airplane icon marked with the green ring.





Report without transaction information (SAR)

En SAR, underretning om mistænkelig aktivitet, er en underretning hvori der ikke indgar transaktioner. En SAR kaldes også en suspicious activity report.

En SAR underretning oprettes gennem webformularen på **GoAML hjemmesiden**. Tryk på *Ny Underretning* i menuen, og vælg *Webunderretninger.*



Derefter skal du vælge Underretning om mistænklig aktivitet (SAR) og følg nedenstående trin.

Select a report type



HOW TO COMPLETE AN SAR REPORT

1 Introductory information about the report

The reporting party is directed to enter the relevant reporting entity branch, the reporting party's internal case number for a report, the reference date and the FIU reference.

Reporting Entity Branch	Reporting Entity Reference	* Report Date	FIU Reference
		m	
Previously Rejected Report Ref Number			

What should I enter in the various fields?

- · Reporting Entity Branch The reporting entity's branch
- Reporting Entity Reference The reporting entity's internal case number
- Report Date (Obligatory) The date the report is sent to FIU Denmark
- FIU Reference Can be used to identify previously submitted report by the person obliged to report regarding the same customer relationship or otherwise related to the current report



Thereafter, the grounds for suspicion should be filled in, in the 'Reason' box.

Reason			

An adequate and detailed basis for suspicion is essential for a good report.

It is important that reports to FIU Denmark contain all relevant information. This means, for example, that the accounts, persons and companies involved must, as far as possible, be identified and described in the reason for suspicion.

The reason for suspicion must consist of a minimum of 100 characters, otherwise the report will be rejected upon submission to the FIU Denmark.

3 Action

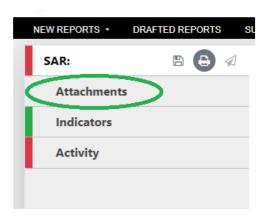
When the reason for suspicion has been filled in, the reporting party will see the Action field.



The Danish FIU recommends that the reporting party states which specific actions the reporting party has taken in relation to the customer to whom the suspicion relates. It could be, for example, that the reporting party has stopped a transaction, terminated a customer or the like.

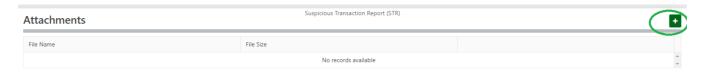
4 Attachments

After this, the next step is to go to Attachments. This is not obgliatory.





by clicking on the green button in the right corner.



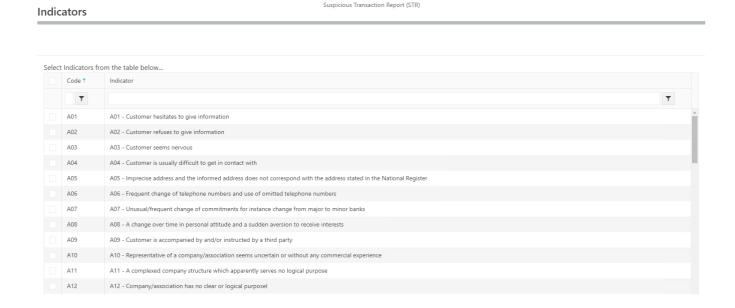
The reporting party may choose to attach attachments to reports. The appendices can, for example, consist of the reporting party's own analysis of a suspected person or company, surveillance material from an ATM, an ID card that identifies the person concerned, work contracts, email correspondence or other relevant material that can support the suspicion.

5 Indicators

After this, the next step is to click on 'Indicators', so that the right indicator codes that are relevant to the report can be selected.



The next step is to select the indicator codes that fit the report.





FIU Denmark recommends that the reporting party selects the indicator code(s) that best suit the report.

If the reporting party cannot place the suspicion within the established indicator codes, the Danish FIU recommends the indicator code '001 - Other' be selected. If the reporting party does not select an indicator, the report is automatically rejected by goAML.

6 Activity

When the reporting party has selected one or more indicator codes for a SAR report, click on to Activity.



The reporting party is now directed to complete the Activity section.



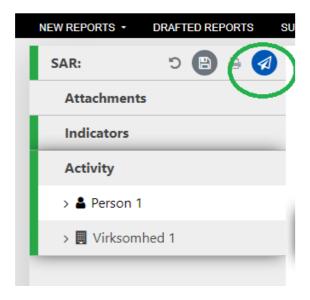
Which category should I choose?

- Bank Account An account from which suspicious transactions are attempted or from which suspicious behavior is displayed
- Person A person who attempts to make suspicious transactions or engages in suspicious behavior
- Entity A company that attempts to conduct suspicious transactions or engages in suspicious behavior



7 Submit report

When the reporting party has completed the report and is ready to send it to FIU Denmark, click on the small paper airplane icon, maked with the green circle.



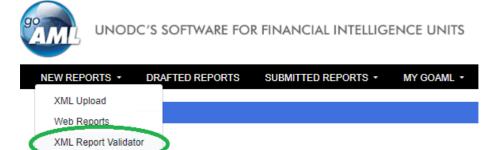


XML schema report

If the attached transactions in the report are saved in XML format, then these can be uploaded directly via the GoAML portal.

XML Report Validator

You can use the XML validation page if you want to be sure that your XML file meets all the requirements specified in the XML schema before submitting it as a report.



XML files are validated on the validation page. You copy the contents of your XML file into the text box and press Validate, after which you will receive an approval or rejection. On this page, you can also download the XML GoAML schema (XSD) with the requirements against which your XML file is assessed.



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NEW REPORTS •	DRAFTED REPORTS	SUBMITTED REPORTS •	MY GOAML *	STATISTICS	ADMIN -
Download the g	goAML schema	gainst the schema. Pa	aste the XML	here and click	k on Validate to proceed
					Validate

Upload XML report

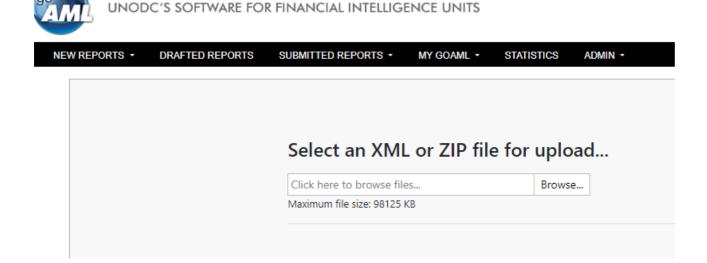
When you are logged in as an organization or individual user, you must do the following:

1. Press New Report ---> XML Upload in the menu.





2. Click on Browse and select the XML file to be uploaded. You can either choose a regular XML file or a zip file.



3. Click on Upload report file. Data is uploaded to the GoAML database with your reporting ID.

Test of the XML generator on the test website

It is possible to test XML generators with the XML schema on our test page.

www.testhvidvask.politi.dk

Here you can create an organisation and users in the same way as on the normal page. The test page has been created in order to test new XML schemas when GoAML is updated.

If you want to create a user in the test environment, you must send an email to **fiu@politi.dk** after you have created your organization so that it can be approved.



Report Rejected

This page contains information about common reasons for reports being rejected.

When you submit a report on the GoAML website, it is validated based on a number of requirements. If the report does not meet the requirements for content, the report is rejected. To edit the report again, it must be sent to *Drafted Reports*.

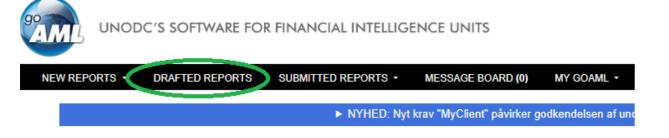
You can do this by locating the report under Submitted Reports. Then press on Rejected.



This will open a box where you can read the reason as to why the report was rejected. At the bottom of the box, you can press Revert, which sends the report to *Drafted Reports*, where it can be edited again.



You can edit and submit the report by going to *Drafted Reports*. The report can be edited for 30 days, after which it will be archived without being submitted.



REPORT REJECTED

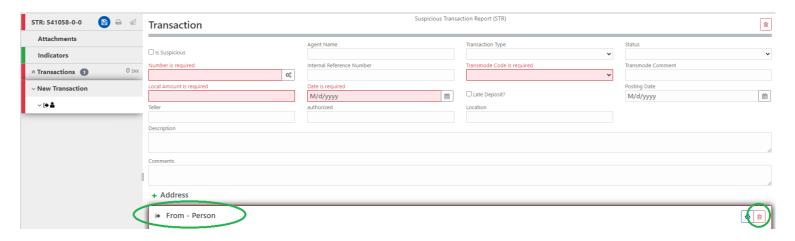
" At least one non-intermediary transaction is missing at least one myClient object"

If a Suspicious Transaction Report (STR) is rejected with the error "MyClient", it means that neither party is marked as being the reporting entity's client in a transaction. It is a validation requirement that at least 1 of the parties in a transaction, either To or From is marked as being the reporting entity's 'client'.

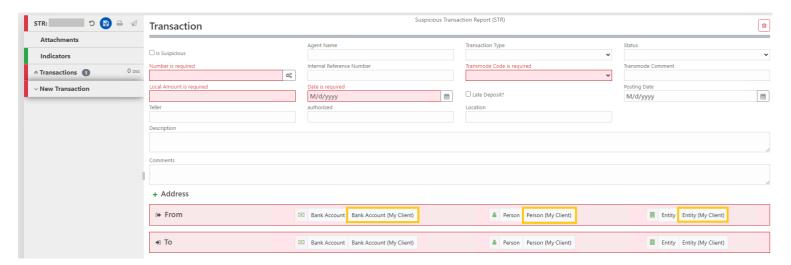
If neither party to a transaction is the reporting entity's customer, the reporting entity must report the transaction as a Suspicious Action Report (SAR) instead.

The reporting entity can correct the error in the draft report by selecting Transactions and deleting the party in a transaction who should be the reporting entity's customer. A party is deleted by pressing the trashcan icon in the right corner of the form for a party.

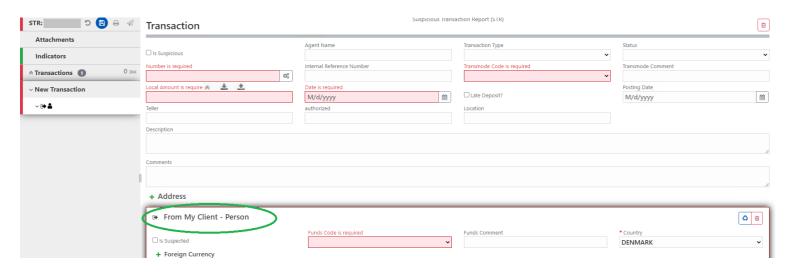




After this, the party must be added again, but with a button marked with MyClient.



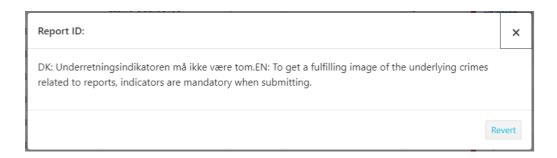
The party is then marked as MyClient in the form.



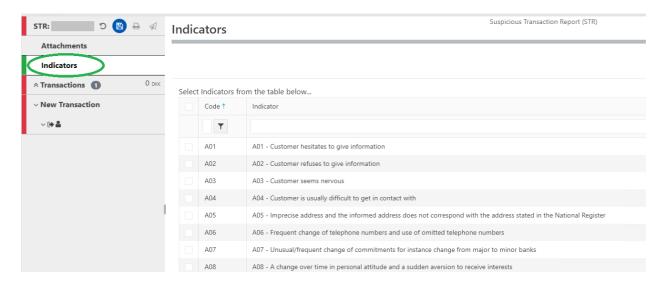
" To get a fulfilling image of the underlying crimes related to reports, indicators are mandatory when submitting."

If a report is rejected with the error "The notification indicator must not be empty", this means that the report does not contain indicators of money laundering. It is a requirement that a notification contains at least 1 indicator.



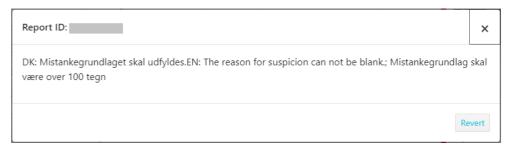


The reporting entity can correct the error in the draft form by selecting Indicators* and selecting at least 1 indicator for suspicion of money laundering. If none of the indicators apply to the grounds for suspicion, the reporting entity can select the indicator O01 - Other.



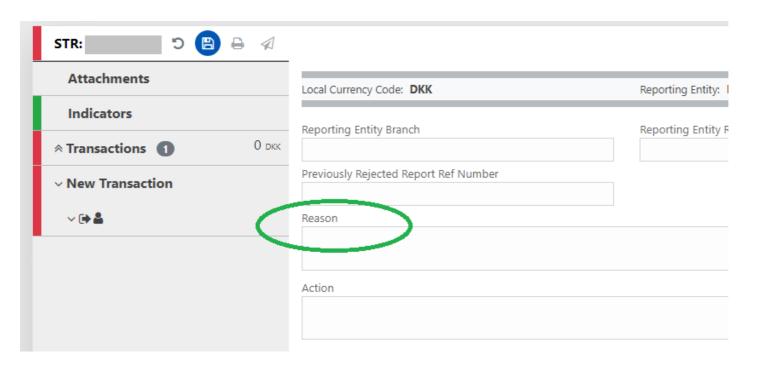
" The reason for suspicion can not be blank"

If a notification is rejected with the error "The reason for suspicion can not be blank" or 'Mistankegrundlag skal være over 100 tegn', it means that the field for grounds for suspicion does not contain enough information. It is a requirement that a report contains a basis for suspicion of money laundering of at least 100 characters.



The reporting entity can correct the error in the draft report by filling in the <u>Reason of Suspicion</u> field with more characters. The <u>reason for suspicion</u> must contain why the reporting entity believes the information provided forms a basis for suspicion.





If you have any questions or concerns regarding completing and submitting reports via GoAML, you are welcome to send an email to fiu@politi.dk