

## KYC Privacy Notice

This notice specifically covers the processing of personal data for Know Your Customer (KYC/KYB) and Anti-Money Laundering (AML) compliance purposes. Any information, rights, or provisions not explicitly addressed in this notice should be considered under the terms of Sovos Privacy Policy.

### Why should I read this?

Sovos and its Affiliates provides regulated services that involve acting on behalf of clients with government authorities and handling financial transactions. These services fall under various anti-money laundering and regulatory frameworks worldwide, which legally require us to verify client identities and understand their business activities.

This notice applies to individuals whose personal data we process for KYC purposes, including direct clients and individuals acting on behalf of corporate clients (such as directors, beneficial owners, authorized representatives, or persons with significant control). If you're providing information as part of your company's onboarding, this notice explains how we handle your personal data even though your company is our client.

### Why we need your information:

**For services requiring KYC/KYB:** Identity verification is required for all services where we handle tax compliance, act as your fiscal representative, process payments, manage VAT/GST obligations, or represent you before government authorities.

**Our regulatory obligations come from:** Various legal frameworks including Anti-Money Laundering Directives with local implementations, Counter-Terrorist Financing regulations, tax compliance and fiscal representation laws, financial services regulations, and jurisdiction-specific Know Your Customer requirements.

**How we verify your identity:** We use automated systems to screen against sanctions lists, check PEP databases, verify document authenticity, and assess risk indicators. Important: all automated flags are reviewed by our Legal team before any decisions are made about your account.

**Legal basis for processing:** We process your KYC data under three legal bases: firstly, our legal obligation to comply with AML/CTF laws wherever we operate; secondly, contract performance where KYC verification is necessary to provide our regulated services; and thirdly, our legitimate interests in preventing financial crime and maintaining regulatory compliance.

### What information we collect:

**Identity verification:** Full legal name, date of birth, nationality; Government-issued identification documents; Proof of address documentation; Photograph or biometric data (where required)

**Business information:** Company registration documents; Ownership structure and beneficial owners (typically 20%+ ownership); Directors and authorized representatives; Nature of business activities; Source of funds/wealth

**Risk assessment data:** Politically Exposed Person (PEP) status; sanctions screening results; Adverse media information; High-risk jurisdiction indicators

**Ongoing monitoring:** Transaction patterns; business relationship changes; regular review updates

**How we collect information:** Directly from you via Due Diligence Questionnaires; Third-party verification services for identity and document verification; Public registries for company and regulatory information; Screening databases for sanctions and PEP checks; Credit reference agencies where applicable.

**Who has access to your information:** Internally, access is strictly limited to those who need it for their roles. We may share your data with regulatory authorities, law enforcement, Financial Intelligence Units, courts, and professional advisors when legally required, always under confidentiality obligations. Our trusted service providers for identity verification, screening, and secure storage operate under strict contracts. Your data is never sold or used for marketing.

**How long we keep your data:** During our relationship, your KYC data is continuously maintained and updated as required. After our relationship ends, we retain your data for a minimum of 5 years as standard, though this may extend up to 10 years depending on jurisdiction, and longer still if required for legal proceedings or ongoing investigations. These retention periods are determined by law, not by Sovos