



The ID Register

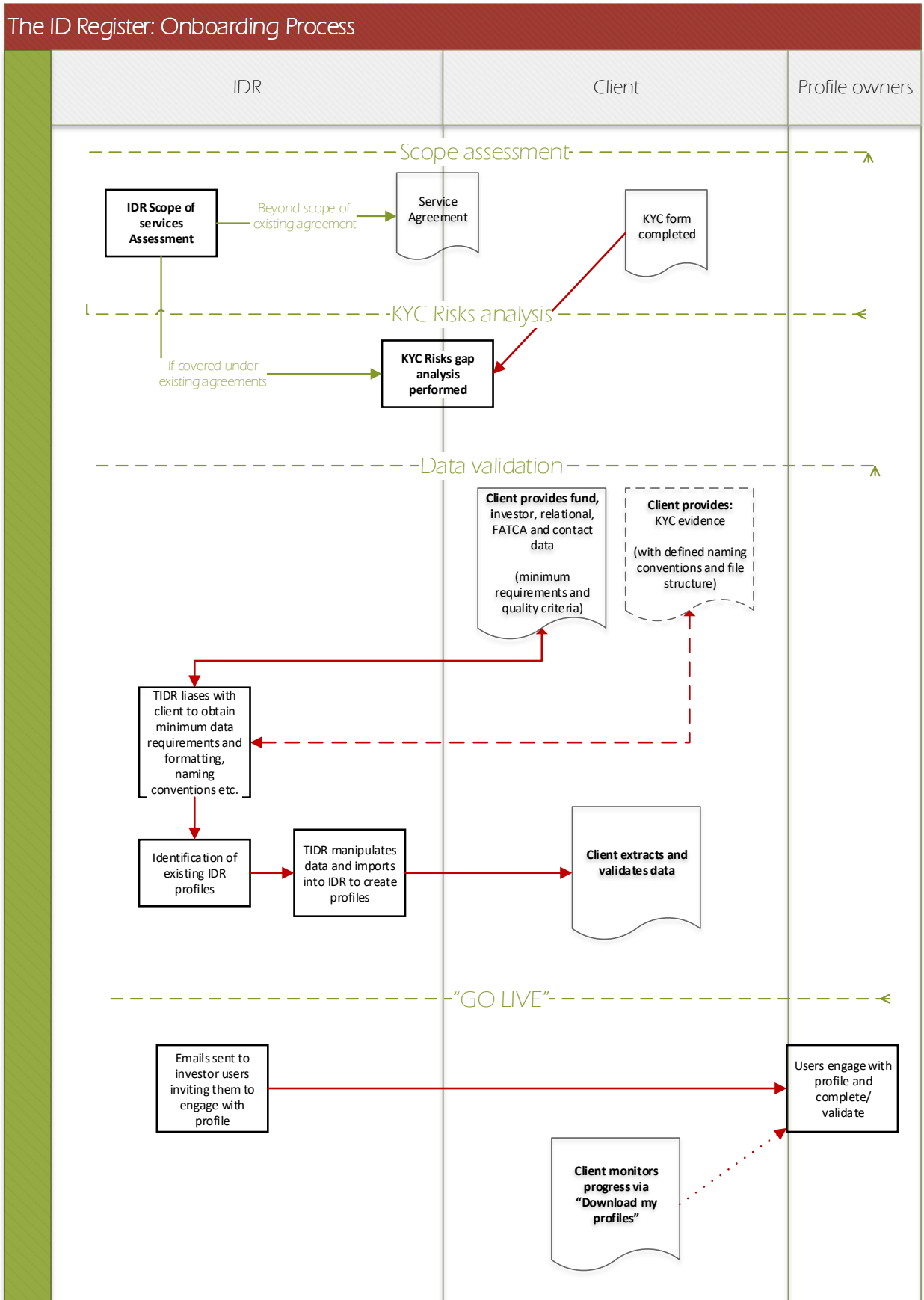
Client Onboarding Guide

November 2019



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Process Summary Diagram

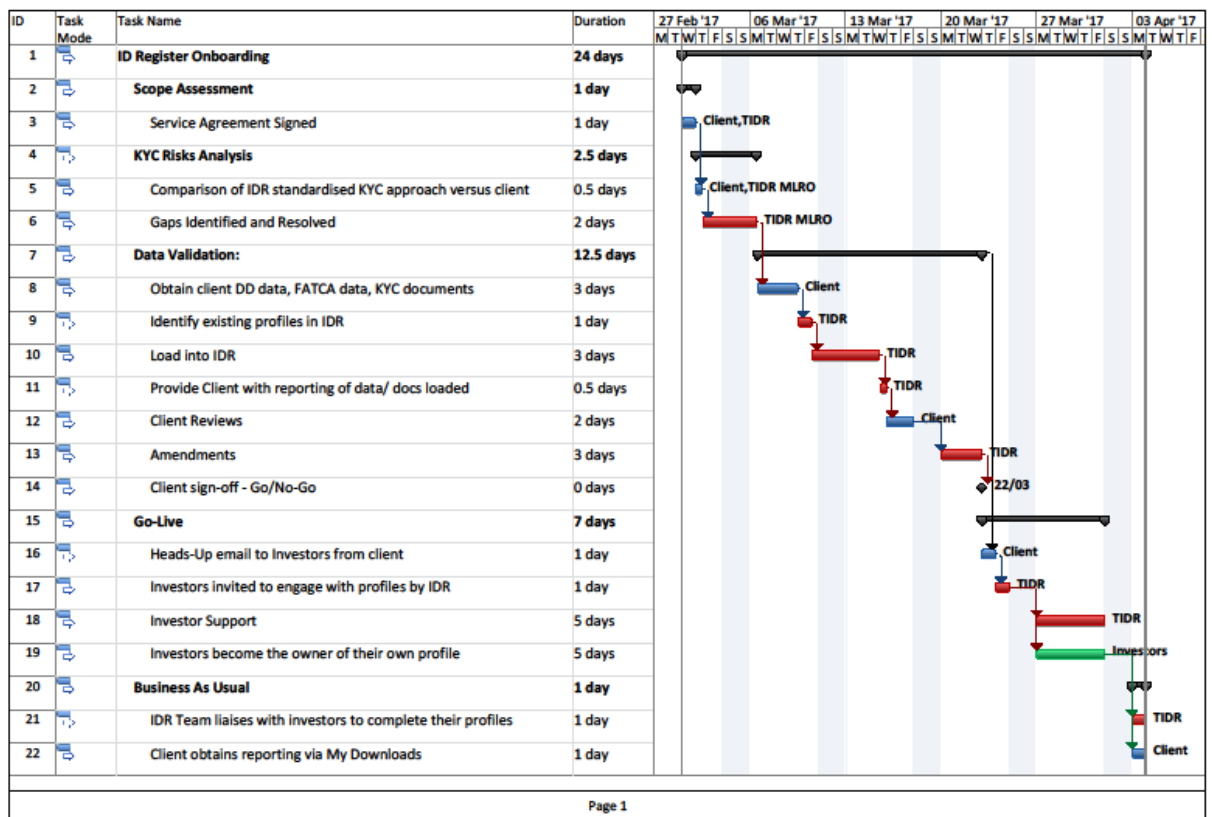


Executive Summary

It's simple to join The ID Register:

1. We match up our KYC questions and risk matrix to yours.
2. We take your investor and fund data and documents and migrate them into the system – simply upload them to us and we will do the rest.
3. We train your team to use the system and verify the data.

Once you are happy, we will Go-Live and ask each investor to validate their profile. The whole process can take a few days or a few weeks, depending on how we receive your data. Here is a typical project plan:



Once we have received your existing data and files, however they are formatted; our Client On-Boarding Team will migrate all the information and introduce you to the system. Your dedicated analyst will act as a single point of contact during the migration process until we transition into business as usual.

The pages below set out each step in more detail. If you have any questions please contact help@theidregister.com or telephone us on +44 20 3787 4138.

On boarding Requirements

The ID Register onboarding team will need to know which of your structures are in scope. To ensure a smooth migration onto the platform we have developed an excel spreadsheet which is structured in accordance with The ID Register.

Migration Template

The data for the migration is populated into our Migration Template. When populating the template please use Appendix 1 to determine what data is required.

Data Migration Process

There are three main components for the migration of data into The ID Register. These are:

- **Migration of Structures**
In Scope Structures, Migration of the data and evidence documents and Your users
- **Migration of Investors**
Individuals and Legal Entities data, evidence documents and the primary users to be invited to The ID Register
- **Communications**
Your communication to your clients and our invite to your clients

Migration of Structures

Before we can create Profiles for your investors we must first create the Profiles for your structures.

In Scope Structures

Please provide a list of the in scope structures in excel or pdf.

Populating the Migration Template

Using The ID Register – Migration Template please populate the relevant data for:

- New Profiles
- Due Diligence
- Relationships
- New Users
- User Entities
- FATCA and CRS (optional)

In addition to your structures*, you will also need to include the list of Profiles for any Directors and Controllers (e.g. The Directors of a GP structure).

Please include any structure diagrams you may have as these will assist us when we set up your structures Profiles.

**Some Structure Profiles may already be set up on The ID Register. Where this is known please also add the Profile ID to the template. This will alert us that the Profile already exists and will speed up our reconciliation.*

Structure Users

Please ensure that you include details of the relevant staff who are to be set up as users on The ID Register. You should decide who in your organisation should have Full control of your Profiles for the purpose of:

- Maintaining your structures Profile details
- Inviting investor Profiles to connect to your Profile
- Remove disinvested investor Profile connections

Please note that The ID Register will send notifications for any Sanction, PEP or Adverse media matches in respect of your investors.

User Permissions

There are 3 permission levels in the ID register:

- **Read** – Can only read the Profile record
- **Write** – Can modify the record and upload evidence but is unable to accept new users or change subscribed services
- **Full Control** – Can modify the record, accept/remove users and change subscribed services.

If you have an MLRO or similar who should receive these notifications please ensure they are connected as a Write user to their relevant structures.

Structure Template Submission

Please send the completed migration template via email : onboarding@theIDRegister.com with the email header: **ID Register Structure Migration – [Your Company Name]**

ID Register Reconciliation

Before we upload your structures we will first check that the Profiles do not already exist. If they do we will use the existing Profile record.

Uploading Structures

We will advise you when the structures have been uploaded successfully and are ready for your review. We will include an extract which includes each structure's Profile ID.

Structure Evidence Documents

In addition to the creation of your structures you will also need to upload the required evidence documents for those structures. Examples include:

- Incorporation documents
- Company Registry / LP Registry Listing
- Regulated Status
- Authorised Signatory Lists
- Constitutional Documents (LPA / Mem & Arts etc.)

Structure Approval

Please confirm by return email once you are happy that your structures have been set up correctly, the Profile relationships are in order and the correct users are connected

Migration of Investors

Using The ID Register – Migration Template please populate the relevant data of each investor for:

- New Profiles
- Due Diligence
- Relationships
- New Users
- User Entities

Investors Related Profiles

In addition to your investors, we will also need to include the Profiles for any Directors and Controllers (e.g. The Directors of a GP structure) of the legal entity investors. Please include these in the migration template and their respective Profile relationships.

If you do not wish to create these Profiles as part of the migration, please advise us how you would like this managed.

Investor Users

Please ensure that you include User details of the Investor who should control the Profile. These Users will be usually be the primary contact of the Profile and will be responsible for:

- Reviewing the Data in The ID Register
- Uploading Evidence Documents
- Connecting to their Investments,
- Creating and maintaining their owner and controller Profiles (in the case of a legal entity)

Investor Template Submission

Please send the completed migration template via email: onboarding@theIDRegister.com with the email header: **The ID Register Investor Migration – [Your Company Name]**

ID Register Reconciliation

Before we upload your investors we will first check that the Profiles do not already exist. If they do we will use the existing Profile record.

Uploading Structures

We will advise you when the investors have been uploaded successfully and are ready for your review. We will include an extract of your structures and their investors.

All Investor Profiles will be private when they are uploaded for the first time. This means they cannot be searched for on The ID Register unless the Profile owner makes the Profile public.

Evidence Documents

In addition to the creation of your investors please advise if you will be pre-populating the Profiles with evidence documents you already hold for example:

- Proof of ID
- Proof of address
- Registry listing
- Constitutional documents

If the intention is for your Investors documents to be uploaded by yourselves from your existing records, please provide us with the email and names of those members of staff who will be responsible for this task.

Any connections your staff may have to an Investor profile will need to be removed prior to the Client Communication.

Investor Approval

Please confirm by return email once you are happy that your investors have been set up correctly, the Profile relationships are in order and the correct users are connected.

Communication

After you have approved both the Structures and connected Investors in The ID Register you will need to communicate to your investors. To assist with this we have the below, suggested wording:

Your Investor Communication

Due Diligence

Our Know Your Client (KYC) and Anti-Money Laundering Obligations, the Foreign Account Tax Compliance Act ("FATCA") and the OECD's Common Reporting Standard (CRS) require us, like all financial institutions to perform due diligence on our investors. You may have received multiple paper due diligence requests from your and we recognise that they can be time consuming and difficult to interpret.

In order to fulfil our due diligence obligations more efficiently, we will be using The ID Register. (www.theidregister.com)

You will receive an email invitation from The ID Register to complete your KYC.

Through The ID Register you can:

- Share your Profile securely to each of your investments and anyone else who needs to see your CDD without having to complete multiple paper forms.
- Use the service for free. Costs are met by the parties who subscribe to your Profile.
- Update your information when anything changes without the hassle of contacting each of your investments.

We very much appreciate your assistance in this matter.

If you have any questions please do not hesitate to contact The ID Register by:

Telephone: +44 20 3787 4138;
Email: help@theidregister.com ; or
Post: Tim Andrews
5th Floor, Market Building
Fountain Street
St Peter Port
Guernsey
GY1 1BX

The ID Register Investor Communication

The ID Register will send one of two communications to your investors

- The Investor has not registered on The ID Register
 - An email with a link to verify their The ID Register User Account.
 - Once Verified the user will be automatically connected to their Profile(s).
- The Investor is already registered on The ID Register
 - An email with a link to The ID Register
 - Confirming that you and your funds are using The ID Register service

Post Migration – Business as Usual Process

After your Structures and Investors have been set up on The ID Register and each Profile is under the control of its respective user The ID Register will not be updating Profiles directly.

Your Structures

You will be responsible for the following in respect of your structures Profiles:

- Maintaining the Profile Data
- Adding and Removing Profile Users
- Adding and Removing Profile Relationships

Your Investors

Your Investors will be responsible for the following in respect of their Investor Profiles:

- Maintaining the Profile Data
- Adding and Removing Profile Users
- Adding and Removing Profile Relationships

The ID Register ongoing duties

We at The ID Register will continue to review any changes and updates to Profile records to ensure that the information is correct and accurate (based on the evidence provided and our own research).

Should you or your investors encounter any difficulties on The ID Register please contact us at: help@theidregister.com

Appendix 1 - Template Summary

The template is called **The ID Register – On Boarding Template**

This spreadsheet is divided into 5 sections as follows:

- **New Profiles** – To be populated with the Profile name and primary address.
- **Profile Addresses** – To be populated with the Place of Business Address of the Profile (secondary address that is different to the primary address).
- **Due Diligence** – To be populated with the Profile due diligence details.
- **Relationships** – To be populated with the intra Profile relationships (e.g. Investor/Investment).
- **User** – To be populated with the User details who will need to be connected to their profiles
- **User Entity** – To be populated with the User id and Profile id the Users are connected to.
- **FATCA and CRS** – To be populated with your structures Classification & Registration Details (Where The ID Register has been engaged for FATCA & CRS Reporting for your structures).

New Profiles (Required)

Name	Format	Description	Required
Status	Formulated	A check field (Do not edit)	N/A
Entity Type	Dropdown	List of Profile Types. Each Profile must have a type	Y
Legal Name	text	Non Individual Entity Name	Y
Forename	text	Individual Forename(s)	Y
Surname	text	Individual Surname	Y
Description	text	Brief summary of the Profile, visible when Profile is not private	N
Primary Contact Email	text	Primary contact email for the Profile. Also used when inviting the Profile Owner to The ID Register	Y
Keep Address Private	Dropdown	Profile address visible on public Profile	Y
Street	text	Primary Address Street	Y
Building	text	Building name	N

Appendix 1 - Template Summary

New Profiles (Continued)

Name	Format	Description	Required
Floor	text	Floor number	N
Postcode	text	Post or zip code	N
City	text	City of Primary Address	Y
Country Sub-Entity	text	State or Region of Primary Address	N
Country	text	Country of Primary Address	Y

Profile Addresses (optional)

Profile Registered and Residential Addresses are created on the New Profiles worksheet. This sheet is primarily used for Place of Business Address where available.

Name	Format	Description	Required
Profile ID	text	The ID Register Unique Identifier	N
Address Type	Dropdown	Only use secondary address type "Place of Business". Other address types created in New Profiles	Y
Street	text	Address Street	Y
Building	text	Building name	N
Floor	text	Floor number	N
Postcode	text	Post or zip code	N
City	text	City of Address	Y
Country Subentity	text	State or Region of Address	N
Country	text	Country of Address	Y
Is Private	Dropdown	Profile place of business address visible on public Profile	Y

Due Diligence (Required)

This is a CDD questionnaire for the Profile and the fields are tailored to the Profile types. Profile specific fields are marked out in **Bold**.

Name	Format	Description	Required
Profile ID	text	The ID Register Unique Identifier	N
Name	text	Full legal name of the Profile	Y
Former name	text	Maiden Name (for individuals) former legal name(s) (for entities)	N
Trading Name	text	Name of the legal entity if different from the full legal name	N
Title	Dropdown	Individual Only - title e.g. Mr, Mrs, Dr etc.	N

Appendix 1 - Template Summary

Due Diligence (Continued)

Name	Format	Description	Required
Gender	Dropdown	Individual Only	N
Birth Date	Date DD/MM/YYYY	Individual Only	Y
Birth Place	Dropdown	Individual Only	Y
Nationality Country	Dropdown	Individual Only - Nationality (x3) <i>(an individual may have more than one nationality. Please set at least 1)</i>	Y
National Identity No	text	Individual Only - National ID or Passport Number (x3)	N
Tax Residence Country	Dropdown	Profile Tax Residence Country(x3) <i>(a Profile may have more than one tax country. Please set at least 1)</i>	
Tax Residence Tax ID	text	Profile Tax Residence ID (x3)	N
Activities Overview	text	Description of Profile primary activities (e.g. HNW individual description, Investment vehicle description, Where Profile invests, type of investments etc.)	N
Most Economical Jurisdiction	Dropdown	Country the Profile is most economically active.	Y
Acting on behalf of Profile ID	text	Profile ID of Profile that this Profile acts on behalf of (e.g. via a Power of Attorney)	N
Acting on behalf of Details	text	Description of in what capacity the Profile is acting on behalf of another Profile	N
Sanctioned Jurisdiction Activities	text	Description of any activities the Profile is undertaking in sanctioned jurisdictions (if any)	N
Is Engaged in Politics	Dropdown	True / False dropdown <i>(Including close associates & immediate family members)</i>	Y
Political Activities Details	text	When dropdown = True. Description of Political Activities or connection to Political person	Y
Is Senior Executive	Dropdown	True / False dropdown	Y
Senior Executive Details	text	When dropdown = True. Description of entity person is a senior executive of	Y
Wealth Source	Dropdown	Profile's Source of Wealth	Y
Wealth Source Details	text	Description of source of wealth	Y

Power of Attorney Profile ID	text	Profile ID of Profile that has Power of Attorney over this Profile	N
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Appendix 1 - Template Summary

Due Diligence (Continued)

Name	Format	Description	Required
Power of Attorney Details	text	Description of in what capacity the Profile is acting on behalf of this Profile	N
Incorporation Date	Date DD/MM/YYYY	Legal Entity Incorporation date. Also used for non incorporation start dates (where the Profile is not a company)	Y
Country of Incorporation	Dropdown	Country the Profile was set up in	Y
Incorporation Number	text	Company Registry or similar identification id	Y
Regulator	Dropdown	Regulated Entity Only - Regulator Dropdown	Y
Regulatory No	text	Regulated Entity Only	Y
Scheme Name	text	Employee Benefit Trust Only	Y
Employer Making Contributions	text	Employee Benefit Trust Only	Y
Government	text	Public Body Only – Name of the Government	Y
Unregistered Bearer Shares Details	text	Private Company Only	Y
Subsidiary of Listed Entity Profile ID	text	If the Profile is a Subsidiary of another Profile enter that Profile's id here	N
Website	text	The Profile Website address (Where available)	N
Stock Exchange	Dropdown	Listed Entities Only – Stock Exchange Dropdown	Y

Appendix 1 - Template Summary

Relationships (Required)

Profiles will have relationships between themselves. This may be an Investor and their Investment or a Director and their Controlled Entity. This table is used to show these relationships.

Name	Format	Description	Required
Source Profile ID	text	The ID Register Unique Identifier for the Profile record the relationship is to	N
Target Profile ID	text	The ID Register Unique Identifier for the Profile record the relationship is from	N
Relationship Type	Dropdown	Profile to Profile Relationship type from the perspective of the Source Profile (e.g. is source Profiles investment)	Y

New Users (Required)

Each Profile should have a User connected. In some instances you may have a Profile record where you would want more than one User (e.g. for a corporate Profile). This can also be done. Details provided are used for The communication from The ID Register which will also contain a registration link that, once registered will automatically connect the User to their Profile(s).

Name	Format	Description	Required
Forename	text	Your Users Forename	Y
Surname	text	Your Users Surname	Y
Job Title	text	Your Users Job Title	N
Employer	text	Your Users Employer	Y
Email	text	Unique email address that is linked to the User account. <i>(No other User Profile can use the same email address)</i>	Y
Phone Number	text	Your Users phone number (If a mobile number is used the use can verify the number for SMS Notifications from The ID Register)	N

Appendix 1 - Template Summary

User Entity (Required)

Each row represents a single User connection to a Profile. Where a user is connected to multiple Profiles you will need to add a line for each user connection.

Name	Format	Description	Required
User ID	text	The ID Register Unique User Identifier	N
Profile ID	text	The ID Register Unique Identifier for the Profile record the user is connected to	N
Permission Profile	Dropdown	Full Control - Profile Admin Write - Profile User with Edit permissions Read - Profile User with Read Only permissions	Y

Appendix 1 - Template Summary

FATCA and CRS (Optional)

Only used where The ID Register has been engaged to generate and submit annual FATCA & CRS Reporting for your **reporting entities only** (not your investors). If The ID Register is also classifying and registering your reporting entities you can ignore this.

Name	Format	Description	Required
Unique ID	text	Your Unique Identifier for the Profile record	Y
Profile ID	text	The ID Register Unique Identifier	N
Profile Name	Read only	Read Only Field – Ignore	N
US Classification	Dropdown	US Classification for Profile	Y
CRS Classification	Dropdown	CRS Classification for Profile	Y
Sponsor Profile ID	text	Sponsoring Profile of the entity that registered the GIIN	Y
GIIN	text	Profile's GIIN (Format: XXXXXX.XXXXX.XX.XXX)	Y
Use The ID Register Responsible Officer	Dropdown	True /False to be used Only when The ID Register Responsible officer is being used	N
Responsible Officer User ID	text	Your own Responsible officer. They Must have a user account on The ID Register (the field asks for the ID. Put the name instead as you will not know the ID)	N
Note	text	Any additional comments in respect of Registration e.g. Point of contact	N
IRS FATCA Login	text	Your Login for the IRS Portal	N
IRS FATCA Password	text	Your Password for the IRS Portal	N
Reporting To Country	Dropdown	The Country the Profile will be submitting a FATCA and/or CRS return to	Y