

PROFILE OVERVIEW

An overview of our existing profiles is shown below.

Primary Jurisdiction	Employee Benefit Trust	Foundation	Individual	Limited Partnership	Listed Entity	Private Company	Regulated Entity	Trust	University	Public Body / SWF	Grand Total
United Kingdom	22	15	2,840	794	10	1,734	42	179	2	53	5,691
United States	10	6	1,068	314	14	1,455	18	95	2	18	3,000
Guernsey	2		15	356	1	365	41	41		1	822
Germany	1		89	28	1	204	13				336
Jersey			34	133		149	1	19			336
Luxembourg			4	10		146	17			2	179
Cayman Islands	1			60		111	1	5			178
France			14	24	3	112	9			1	163
Switzerland	3	2	32	2	1	93	4	14		1	152
Netherlands	2	6	33	25		66	5	11			148
Virgin Islands, British			2	2		117					121
Sweden	1		27	4		46	1	1		3	83
Finland			8	12	1	44	5	1		1	72
Norway		1	10	1	1	47	1				61
Colombia			49				2	1			52
Canada			7	3		23	2	6		2	43
Denmark			1	13		26	1	1			42
Australia			3			16	4	11		3	37
Ireland				1		31		2			34
Cyprus			9	1	1	20					31
Grand Total	42	30	4,245	1,783	33	4,805	167	387	4	85	11,581

Within these values, we hold the due diligence of:

US States:	19
US Universities:	32
Pension Schemes:	318

One recent multi \$Bn fund manager found that 53% of their existing investors were on the platform already. The bulk of the individual profiles are owners and controllers of the legal entities that invest in funds.

DATA PROTECTION AND PRIVACY

Our [Terms & conditions](#) and [Privacy policy](#) must be accepted before a user may create or access profiles on the platform. In doing so, they accept the following clause (3.2):

You own all of the contents of Client Files, but you also grant us a non-exclusive license to them.

You own the content and information that you submit or post to the Services and you are only granting us the following non-exclusive license: A worldwide, transferable and sub licensable right to use, copy, modify, distribute, publish, and process Client Files without any further consent, notice and/or compensation to you or others. ...

We also have the right to update these terms with notice, in clause 11.

DATA SECURITY AND CYBER SECURITY

The ID Register is owned and operated by The ID Register (Guernsey) Limited which is registered with the data protection commissioners of Guernsey, Jersey, Ireland and the UK through its operating subsidiaries. Data is processed in accordance with our [Privacy policy](#) and is fully compliant with the [EU Data Protection Directive 2016/680](#), especially given that the contents of each profile are owned, published by and available to their subjects.

The ID Register is protected in the following ways

- Our database is 100% encrypted with 256bt encryption. That would take you more that 1 billion years of supercomputer time to decrypt using brute force.
- The webserver sit on the [Microsoft Cloud](#) where they are replicated across a cluster of data centres in northern Europe, protected by advanced threat-detection and prevention systems and respond instantly to peaks and troughs of activity. We also have a continual penetration testing program with independent third party suppliers.
- The information is then scrambled by 2048-bit encryption and passed to and from your browser through a secure tunnel is that's virtually unbreakable by hackers.

The enterprise-level security of the platform therefore compares extremely well to existing industry practice. Full details are available [here](#).

ELECTRONIC DUE DILIGENCE:

Almost all worldwide jurisdictions have recognised the validity of digital signatures since the early 2000s. Cayman ([The Electronic Transactions Law, 2000](#)), Luxembourg ([The Grand-Ducal Regulation of 1st June 2001](#)), UK [Financial Crime Guide](#) for example. Recent changes in the handbooks of Guernsey ([Handbook annex 2015](#)) and Jersey ([Handbook update 2016](#)) for example make explicit the regulators' support for digital signatures in the KYC process. Documents on the ID Register are certified using a digital signature. The table below shows the common requirements for this process in the legislation referenced above, together with others.

Legal Requirement	Paper-based problems	Solved by The ID Register
Only the signatory can create their signature	Can your children passably sign your signature? How often do we check that the notary's stamp is real?	We store the email address used by the signatory, their IP address, name, address, telephone number, professional accreditation and their fully validated ID Register profile, if applicable. We also contact new accreditors by telephone and reconfirm their certifications periodically thereafter.
The signatory understands the reason for which the document is being certified	No evidence of this explanation is retained on the signed document.	This is explained in the certification email and on the certification screens.
Neither the signature nor the document to which it is appended cannot be altered after it has been signed.	Hold the paper up to the light - if you receive the paper copy that is.	We apply digital rights to the signed document in accordance with ISO 32000 with a Digital Certificate. This acts as a seal and ensures that the document has not been altered after it was signed.

Regulatory support for digital signatures therefore both reduces the cost and increases the effectiveness of certification.

UPDATES TO KYC, FATCA/CRS AND FUND SUBSCRIPTION REGULATIONS

The ID Register works in world-wide partnership with KPMG. Periodically and at least annually, KPMG audit and update the system logic to support changing FATCA/CRS requirements across the world. KPMG are also second-line support to the ID register in case of unusual questions from specific jurisdictions.

The ID Register is also allied to the Stepstone Group who have sponsored the creation of the Universal Subscription Questionnaire. 34 legal firms world wide have supported its creation and 11 international practices have supplied detailed comments. The ID Register is currently in the process of engaging an international legal practice to maintain the USQ and associated AML requirements globally.

LIVE INVESTOR ACCESS

Unlike traditional paper processes, your investors may log on to The ID Register and update their profiles at any time. They will be prompted to do so by The ID Register under the following conditions:

- 30 days before evidence expires
- When a new connection is made, for example if an investor makes a new investment.
- If they have not logged on for 12 months.

Each user can log on, reset their password or change their details independently but also have a hotline to contact for help.

COSTS

The ID Register is a fund cost, similarly to administration work. It replaces the following costs amongst others:

Current fund costs	Replaced by:	ID Register Pricing (for managers with > 200 investors)	
▪ Legal fees on fund launch		AML	£10 per (investor) profile per month
▪ Sanctions Screening software costs		FATCA/CRS	£10 pppm
▪ Administration costs for AML refresh		FATCA/CRS KPMG Assurance	£2 pppm
▪ Consultancy costs for FATCA & CRS			

We are happy to discuss a cap at a sensible commercial level. Agreed fees are then billed monthly by standing order.