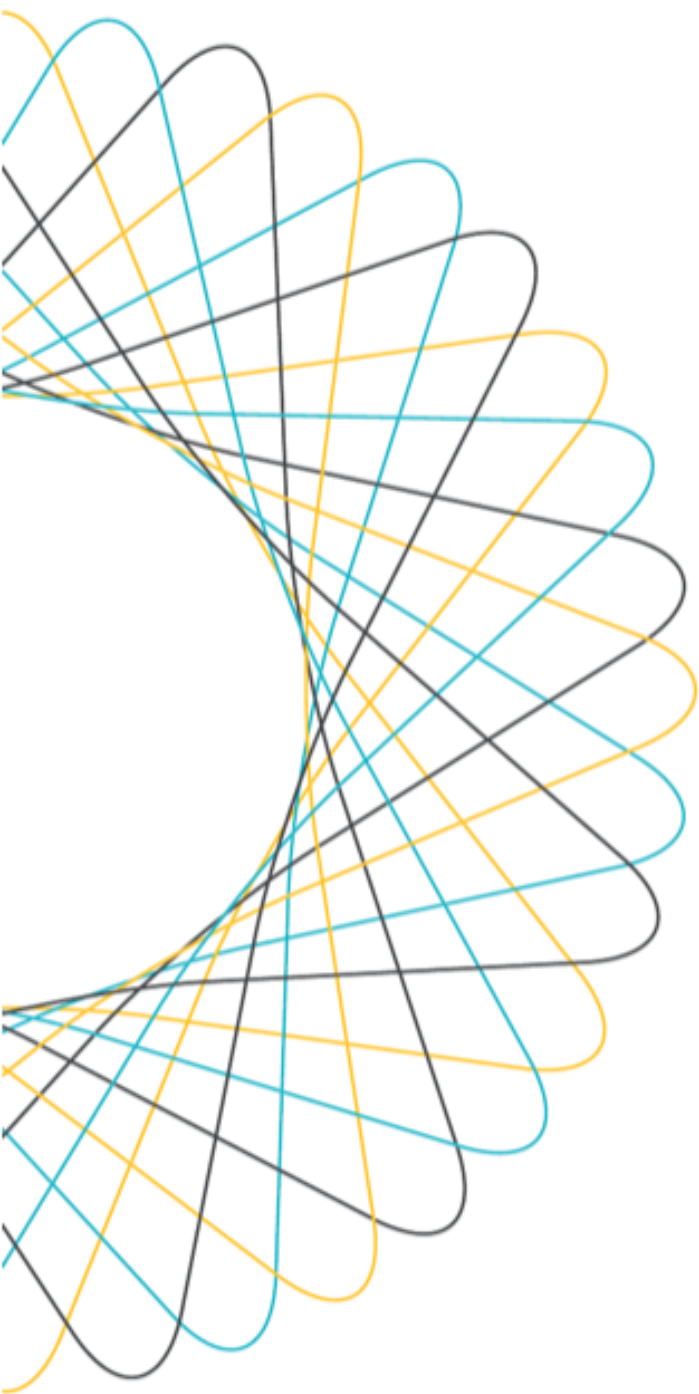




**Payment  
Institution**



## Guideline

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### **AML**

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**Approved by:** Board of Directors Payment Institution NFD a.s.

# **Own Activity Program for Prevention of Legalization of Proceeds from Criminal Activity and Protection against Terrorist Financing**

(the "Program")

Payment Institution NFD a.s., BRN: 46 847 162, residing at: Popradská 17/670, Stará Ľubovňa 064 01, registered in the Commercial Register of the District Court in Prešov, Section: Sa, Insert No. 10486/P, with authorization to operate as a payment institution registered under Decision No.: ODB-10851/2014-7 (the "Company" or "NFD")

## **Preamble**

The purpose of this Own Activity Program for Prevention of Legalization of Proceeds from Criminal Activity and Protection against Terrorist Financing (the "Program") is synchronization of internal activities with obligations imposed by Act No. 297/2008 Coll. on the Prevention of Legalization of Proceeds from Criminal Activity and Terrorist Financing and Methodological Guideline No. 6/2013 of the Financial Market Supervision Unit of the National Bank of Slovakia of December 2, 2013 on protection of a payment institution, electronic money institution, payment services agent, foreign payment institution branch, and foreign electronic money institution branch against money laundering and terrorist financing activities (the "Act").

1. This Program is intended for persons who are responsible (the "Mandated Employee") within the Company for identification of persons applying to open an account (the "Applicants") and existing Customers and monitoring of their activities.
2. The Manager of the Money Laundering and Terrorist Financing Protection Unit, or an Authorized Person (the "AP AML") and his/her deputy (the "DAP AML") are responsible for compliance with and updates to the Program.
3. This Program covers:
  - the manner in which customer due diligence is implemented;
  - overview of forms of unusual business transactions according to the subject matter of operations of the obliged person;
  - method of risk assessment and management under Article 20a of the Act;
  - assessment procedure as to whether the transaction being prepared or executed is unusual;
  - procedure following the discovery of an unusual business transaction to its immediate reporting to the Financial Intelligence Unit, including procedure and responsibilities of employees who assess such unusual business transaction;
  - procedure for postponing an unusual business transaction under Article 16 of the Act;
  - procedure for keeping data under Article 19 of the Act;
  - appointment of a person and his/her deputy responsible for protection against legalization and providing reporting of unusual business transactions and ongoing contact with the Financial Intelligence Unit;
  - the manner of protection for an employee who detects unusual business transactions;
  - content and schedule of special training for employees who may encounter an unusual business transaction in the course of the performance of their work;
  - the manner in which control of compliance with this Program is carried out and responsibilities arising out of this Act for an obliged person;
  - list of risky and unsupported activities, persons and entities, and countries

## **Definition of Basic Terms**

**Under the current legislation valid and effective in the territory of the Slovak Republic the following definitions apply:**

1. **legalization**, or "money laundering" is understood to be a deliberate act consisting in:
  - a) conversion of nature of property or transfer of property, knowing that the property originates from criminal activity or involvement in criminal activity, with the aim of concealing or disguising the illicit origin of the property or with the aim to assist a person involved in the commission of such criminal activity to avoid the legal consequences of his/her conduct;
  - b) concealment or disguising of the origin or nature of property, the location or movement of property, the ownership or another title to the property, knowing that the property originates from criminal activity or involvement in criminal activity;
  - c) acquisition, possession, use and handling of property, knowing that the property originates from criminal activity or involvement in criminal activity,

- d) involvement in an action under letters a) through c), even in the form of association, assistance, instigation and incitement, as well as in attempting such action;
- e) i.e. act whose aim is to conceal the existence of property originating from criminal activity or to conceal its illicit origin and its further use as if the origin of such property was legitimate. It is irrelevant whether such property generating activity was carried out in the territory of the Slovak Republic or in the territory of any other country.

**2. terrorist financing** is understood to be the provision or collection of funds with the intention to use them or knowing that they are to be used, in whole or in part, to commit:

- a) the criminal offence of establishing, contriving or supporting a terrorist group or the criminal offence of terrorism, or
- b) the criminal offence of theft, the criminal offence of extortion or the criminal offence of counterfeiting or altering a public document, official stamp, official seal, official sign and official mark, or instigating, aiding or inciting a person to commit such criminal offence or to attempt it with the aim to commit a criminal offence of establishing, contriving and supporting a terrorist group or the criminal offence of terrorism;
- c) financing of everyday needs of a person where it is reasonable to assume that such person intends to commit or has committed the criminal offence of terrorism and some other forms of participation in terrorism;
- d) criminal offences under international agreements that were ratified and published in a manner consistent with law and by which the Slovak Republic is bound.

Terrorist financing is prohibited.

**For NFD as an obliged entity, as well as its employees, directors, and chief clerks, it is important to know that with respect to legalization and financing of terrorism the reporting duty of NFD under the Act occurs at the moment when a transaction “indicates” that its execution may lead to legalization or to terrorist financing, i.e. it is not required to have knowledge of actual legalization or terrorist financing.**

**3. Politically Exposed Person:**

- 1) a natural person who is or was entrusted with a prominent public function and does not have permanent residence in the Slovak Republic during performance of his/her prominent public function and for the period of one year after termination of such performance, namely a head of state, prime minister, deputy prime minister, minister, head of a government agency, state secretary or a similar deputy of a minister, member of Parliament, judge of the Supreme Court, judge of the Constitutional Court or other high-level judicial bodies the decisions of which are not subject to further appeal except for special cases, member of the court of auditors or of the central bank board, ambassador, chargé d'affaires, high-ranking military officer, member of an executive body, supervisory body or auditing body of a state enterprise or a state-owned company, or a person holding a similar post in the institutions of the European Union or international organizations, or a member of a statutory body of a political party, or a political party;
- 2) a natural person who is:
  - a. the spouse or a person having a status equivalent to the spouse of a person referred to in paragraph 1) above;
  - b. a child, son-in-law or daughter-in-law of a person referred to in paragraph 1) above or a person having a status similar to such son-in-law or daughter-in-law referred to in paragraph 1) above, or
  - c. a parent of a person referred to in paragraph 1) above;
- 3) a natural person known to be the beneficial owner of
  - a. the same customer or to be in control of the same customer as a person referred to in paragraph 1) above or operates a business together with a person referred to in paragraph 1) above, or
  - b. a customer established for the benefit of a person referred to in paragraph 1) above.

**4. Beneficial Owner** – every natural person who ultimately operates or controls a legal person, natural person or an entrepreneur or corporation, and every natural person for the benefit of whom these entities operate, or a natural person who especially:

- 1) in case of a legal person who is not part of the corporation or an issuer of securities admitted to trading on a regulated market who is subject to disclosure requirements under a special regulation, an equivalent to a legal regulation of a Member State or an equivalent to international regulations, a natural person who:
  - a. has a direct or indirect interest or sum thereof of at least 25% in the voting rights in a customer who is a legal entity – entrepreneur, or its capital including bearer shares,
  - b. is entitled to appoint, otherwise constitute or dismiss a statutory body or another executive body, supervisory body, or auditing body of a customer who is a legal person – entrepreneur,

- c. in a manner other than those referred to in letters a and b controls a customer who is a legal person – entrepreneur,
- d. is entitled to at least 25% of the profit from the operations of a legal person or its other activities.

If no natural person meets the criteria referred to in paragraph 1) then the Beneficial Owner for this person is considered to be the members of its top management where a member of the top management is considered to be a statutory body, member of a statutory body, clerk and senior manager holding a post of the direct manager of the statutory body.

- 2) in case of a natural person – entrepreneur, a natural person who has the right to the profit of at least 25% from the operations of the natural person – entrepreneur or other activities of such person.
- 3) in the case of a corporation, a natural person who:
  - a. is the founder or establisher of the corporation; if the founder or establisher is a legal person, a natural person under paragraph 1);
  - b. has the right to appoint, otherwise constitute or dismiss a statutory body, executive body, supervisory body, or auditing body of the corporation or its member, or is a member of a body that has the right to appoint, otherwise constitute or dismiss these bodies or its member
  - c. is a statutory body, executive body, supervisory body, auditing body or a member of these bodies
  - d. is a beneficiary of at least 25% of funds supplied by a corporation, provided the future beneficiaries of those funds have been designated, or
  - e. is one of those persons for whose benefit a corporation is established or operates, if the future beneficiaries of funds of the corporation have not been designated,
- 4) has a reasonable assumption that the customer or the Beneficial Owner is a person on whom international sanctions are imposed under a special regulation, 1a) or a person who might have a relationship to such person, or
- 5) where there is a reasonable assumption that its subject is or is to be an object or a service that may relate to an object or a service on which international sanctions are imposed under a special regulation.1a)

1a) Act No. 289/2016 Coll. on the Enforcement of International Sanctions and on an amendment to Act No. 566/2001 Coll. on Securities and Investment Services and on amendments to certain laws (the Securities Act) as amended.

#### **Preservation of Data relating to Beneficial Owner**

- 1) NFD keeps and updates on an ongoing basis identification data on the Beneficial Owner in the extent as set out in Article 2 (1) a); data that confer a status of the Beneficial Owner under the definition specified in the paragraph 4 of the Definitions of Basic Terms section herein and data that proves the status of the Beneficial Owner unless such data are part of a verification document in the public sector register of partners.
- 2) NFD keeps data on the Beneficial Owner in accordance with paragraph 1 for the period of time during which a natural person holds the status of the Beneficial Owner and for the next five years immediately following the cessation of this status.
- 3) NFD is required when prompted by the obliged person, within a required time period, to provide required data to special units of the financial police service of the Police Force of the National Bank of Slovakia, court, law enforcement authority, or an administrative body for tax, fees and customs matters pursuant to paragraph 1 unless such data is contained in the register of legal persons, entrepreneurs and public authorities

### **Article 1**

#### **Overview of Forms of Unusual Business Transactions**

- 1. Unusual business transaction (the “UBT”) means a legal act or other act which indicates that its execution may enable legalization or terrorist financing. The assessment whether a transaction is a UBT lies with NFD. It is NFD’s task to determine, based on its experience and other facts, whether a transaction with regards to legal and natural persons in cooperation with whom such transaction is being prepared or executed can be classified as unusual. NFD does not need to know what type of criminal offence might be involved, who might have committed it, nor does it need to know any other facts relating to constituent elements of a specific criminal offence. The NFD’s task is to evaluate certain anomalies which due to their nature, content or exceptionality clearly fall outside the normal parameters or nature of certain transactions or certain Customer.
- 2. The law generally defines a UBT as each of the following transactions:
  - a) which with regards to its complexity, unusually high amount of funds or its other nature goes apparently beyond the common framework or nature of a certain type of transaction or a transaction of a certain Customer;

- b) which with regards to its complexity, unusually high amount of funds or its other nature has no apparent economic purpose or a visible lawful purpose;
  - c) where the Customer refuses to identify himself/herself or to provide the information necessary for the obliged entity to perform customer due diligence under Sections 10, 11 and 12 of the Act;
  - d) where the Customer refuses to provide information of the upcoming transaction or tries to provide as little information as possible or provides such information that the obliged entity can verify only with great difficulty or at a great cost;
  - e) where the customer demands its execution based on a project which raises doubts;
  - f) where funds of low nominal value in a considerably high amount are used;
  - g) with a Customer in whose case it can be presumed that with regards to his/her occupation, position or other characteristics he/she is not or cannot be the owner of the required funds;
  - h) where the amount of funds that the Customer has at his/her disposal is in apparent disproportion to the nature or scope of his/her business activity or financial status declared by him/her;
  - i) where there is a reasonable assumption that the funds or property is to be used or was used to finance terrorism;
  - j) where there is a reasonable assumption that a Beneficial Owner is a person who collects or provides funds or property for the purpose of financing terrorism;
  - k) which is executed from a country or to a country on the territory of which terrorist organizations operate or which provides funds or other support to terrorist organizations;
  - l) where there is a reasonable assumption that the Customer or Beneficial Owner is a person on whom international sanctions are imposed under a special regulation, or a person who might have a relationship with a person on whom international sanctions are imposed under a special regulation; or
  - m) where there is a reasonable assumption that its subject matter is an object or a service that may relate to an object or a service on which international sanctions are imposed under a special regulation;
  - n) where there is an assumption that during the execution of transfer or use of services unreasonably high transaction costs are to be incurred which clearly exceed the value of the services required.
3. When evaluating individual cases it is always necessary to consider all facts relating to and connected with the payment service the Customer or potential Customer (Customer and potential Customer hereinafter referred to jointly as the "Customer") is interested in.
- When evaluating whether a transaction is a UBT, it is necessary to consider the following facts relating to the payment services:
- a) Any substantial increase in credit payments in a payment account ("Customer's funds") of a Customer without an apparent reason, especially if a Customer is clearly interested in:
    - i. subsequent termination of cooperation;
    - ii. subsequent forwarding of the funds where objectively a disproportionately higher amount of funds in the Customer's payment account comes from third parties.
  - b) Customer made a cash deposit in the bank with the aim to deposit the funds into his/her payment account;
  - c) the discovery of suspicious documents;
  - d) Customer's effort to avoid personal contact with an NFD employee;
  - e) refusal of the Customer to provide personal information or information that is normally required to be provided when opening a payment account,
  - f) Customer's request to execute a payment transaction to a bank having a branch in or operating in a country that is routinely associated with the production, processing or sales of drugs, terrorist organizations, or accepting regular and large payments from such countries;
  - g) Customer's request to execute a payment transaction to companies / cooperatives as a silent partner in an amount that does not correspond with his/her personal circumstances;
  - h) repeated opening and closing of Customer's accounts and accounts of persons close to him/her.
4. When evaluating whether a transaction is a UBT, it is necessary to consider the following facts relating to payment services whose origin or purpose is declared as a loan/credit by the Customer:
- a) Customer's unexpected request relating to early repayment of a loan/credit, especially with regards to his/her financial situation;
  - b) Customer's repeated requests to forward funds from loans/credits provided by various financial institutions and lenders without any apparent economic purpose, or whose final amount does not correspond with the financial situation of the Customer;

- c) Customer's request to transfer his/her funds to finance the purchase of movable or immovable property when it is apparent that, with regards to its purpose as well as price amount, such property has no economic importance, or that the price of such property does not correspond with the financial situation of the Customer;
- d) early repayment of credit in a substantial amount shortly after it was granted from sources originating in high-risk countries;
- e) accepting credit and executing early repayments within unusual and frequent time limits within short intervals.

## **Article 2 Identification of Applicant**

1. Pursuant to general binding rules, NFD is obligated to ensure that no payment services are provided in its name without obtaining:
  - a) personal data in the extent of first name, last name, address of permanent residence, address of temporary residence, personal identification number if applicable, date of birth, citizenship, type and number of an identification document in case of a natural person including a natural person representing a legal person; in case of a natural person who is an entrepreneur also the address of the place of business, identification of a register or other record keeping system where the natural person – entrepreneur is registered and the number of such registration or record, in case of a minor who does not possess an identification document a first and last name and personal identification number or date of birth, permanent or other residence address, citizenship of such minor and his/her legal representative, in accordance with a birth certificate or a Court decision on appointment of a guardian for a minor;
  - b) identification data in the extent of name, identification number if applicable, residence address, address of the location of business or its branches or other location of operations, list of members of the statutory body of the legal person and data on these members in the extent as per the previous paragraph, identification of a register or other record keeping system where this legal person is registered and the number of entry into this register or system in case of a legal person, and identification of each natural person authorized to act on behalf of the legal person;
  - c) contact phone number, fax number, and address of an electronic mail, if available;
  - d) copies of documents and data confirming authorization to represent in case of a representative;
  - e) information about requests and needs of a Customer, his/her experience and knowledge relating to the payment service and information about the financial situation of a Customer, all in regards to the nature of the financial service that is the subject matter of the transaction;
  - f) and performance of a qualified consideration pursuant to the Act in order to determine which type of due diligence is to be applied by the obliged person to the Customer under the Act.

Based on the risk assessment under Article 20 (1) of the Act, apart from the data specified in section 1, NFD may ask for other data, e.g. phone number, email address for delivering email communication, information about occupation or employer.

Due diligence that is to be provided with regards to the Customer may be:

- a. basic customer due diligence,
- b. simplified customer due diligence, or
- c. enhanced customer due diligence,

and the type to be used will depend on the risk of legalization or terrorist financing.

2. Identification of a Customer is the responsibility of a Mandated Employee who deals with the Customer on behalf of NFD in the ordinary course of business. Mandated Employees and their substitutes are appointed by AP AML.

## **Article 3 Basic Customer Due Diligence**

1. Basic customer due diligence must be performed with regard to each Applicant and Customer in cases where there is no need to perform enhanced customer due diligence or if it is not further stipulated that performance of simplified customer due diligence is sufficient:
  - a) when entering into a framework contract;
  - b) NFD is required to perform basic customer due diligence during execution of an occasional transaction outside a business relationship in the amount of at least €15,000 and during execution of an occasional transaction

- outside a business relationship in the amount of €10,000 if it is a cash transaction, regardless of whether the transaction is executed as a single transaction or as several linked transactions which are or may be connected;
- c) if there is a suspicion that the Customer is preparing or executing a UBT with regards to the provision of a payment service, and this applies even after a framework contract has been entered into regardless of the value of the trade;
  - d) when there are doubts about the veracity or completeness of the previously obtained identification data of the Customer;
  - e) when it concerns payment of the final balance of a cancelled payment account to a bearer;
  - f) when it concerns operating of a gambling game with regards to a transaction in the amount of at least €2,000, regardless of whether such transaction is executed as a single transaction or as several linked transactions that are or may be connected;
  - g) pursuant to Article 10 of the Act, basic customer due diligence is performed by NFD when the Applicant is present for the opening of the payment account, in case the Applicant is a legal person then the presence is considered to be the presence of such a person/persons who is/are authorized to act on behalf of the company. In case of Applicant – the legal person the Mandated Employee is required to identify the Beneficiary Owner.

During verification of the Applicant, the Mandated Employee is required to verify that such Applicant has submitted all the documents specified in the Appendix “Basic Customer Due Diligence – Natural and Legal Persons”.

Basic customer due diligence is performed by an obliged person pursuant to Article 10 of Act No. 297/2008; with regards to the Applicant and Customer (the “Customer”) it includes:

- a) Identification of a Customer and verification of his/her identification at any phase of providing payment services as well as when requesting the opening of a payment account, in the extent of:
    - i. Customer’s personal data,
    - ii. Customer’s identification data in case of a legal person,
    - iii. Personal or identification data of a statutory body of a Customer, and
    - iv. Obtaining of personal or identification data of a Customer’s representative. It follows that in case a representative is acting on behalf of a Customer, it is necessary to obtain and verify identification of the representative, not only by securing a document confirming his/her right to act on behalf of the Customer, but also by securing personal and identification data of the Customer, its statutory body, and its representative.
  - b) Identification of the Beneficiary Owner and taking appropriate measures to verify his/her identification, including measures to determine the ownership structure and management structure of the Customer who is a legal person or a corporation;
  - c) Obtaining information about the purpose and planned nature of a business relationship;
  - d) Determining whether the Customer or Beneficiary Owner is a Politically Exposed Person or a person on whom sanctions have been imposed;
  - e) Depending on the risk of legalization or terrorist financing, determining the origin of the funds or property relating to the business or business relationship;
  - f) Determining whether the Customer is acting on his/her own behalf;
  - g) Conducting ongoing monitoring of the business relationship including scrutiny of particular transactions carried out throughout the duration of the business relationship for the purpose of determination whether the transactions being executed are consistent with the knowledge acquired about the Customer, his/her business profile and review of possible customer-related risks, and, depending on the risk of legalization or terrorist financing, determining the origin of funds and ensuring that the documents, data or information held about the Customer are kept up-to-date.
2. NFD is required to perform identification of the Customer and verification of his/her identification in case of executing any transaction the amount of which reaches at least €1,000, unless it concerns any of the cases under paragraph 1.
  3. NFD shall determine the extent of customer due diligence adequately to the risk of legalization or terrorist financing. During the assessment of the risk of legalization or terrorist financing, NFD is required to evaluate and take into consideration risk factors specified in the risk assessment under Article 20a(1) of the Act.

4. A Customer is obligated to provide NFD with information and documents required to perform customer due diligence or identification and verification of identification under paragraph 1.
5. The validity and completeness of identification details must be verified also throughout the duration of a business relationship and any changes in those details must be recorded if required with regards to the provision of payment services.
6. When performing basic customer due diligence, NFD determines whether a Customer acts on his/her own behalf. If NFD finds that the Customer does not act on his/her own behalf, NFD shall ask the Customer to submit a binding written statement to prove the first name, last name, personal identification number or date of birth of a natural person, or a business name, address of registered offices and identification number of a legal person on behalf of whom the transaction is being executed; the obliged person shall follow the same procedure also in case where doubts arise as to whether the Customer acts on his/her own behalf.

#### **Article 4**

##### **Simplified Customer Due Diligence**

1. Simplified customer due diligence may be performed in cases specified below, however, this does not remove the obligation to:
  - a) obtain personal or identification data of a Customer, his/her statutory body, or his/her representative;
  - b) verify whether, based on the information that is available about a Customer or the financial service requested by a Customer, there is any suspicion that the Customer is preparing or executing a UBT, and whether this is a case of simplified customer due diligence. If there is such suspicion or any doubt as to whether a Customer is preparing or executing a UBT, it is necessary to always perform the basic customer due diligence unless enhanced customer due diligence is required in accordance with Article 5.
2. NFD may perform only basic customer due diligence with low risk of legalization or terrorist financing in the following cases:
  - a) If the Customer is a central securities depository, securities exchange, commodity exchange, management company and depository, professional securities dealer, financial agent, financial advisor excluding performance of activities relating to insurance other than life insurance, foreign collective investment enterprise, insurance company performing insurance activities relating to life insurance, pension fund management company, retirement savings plan management company (the "Financial Institution") or a bank (the "Credit Institution") that operate on the territory of a EU Member State or other State that is a party to the Agreement on the European Economic Area (the "Member State");
  - b) If the Customer is a Credit Institution or a Financial Institution that operates in the territory of a third country which imposes obligations on it with respect to the prevention and detection of legalization and terrorist financing that are equivalent to the obligations established by the Act and it is supervised with respect to the performance of these obligations;
  - c) If the Customer is a legal person whose securities are negotiable on a regulated market in a Member State, or a company which operates in the territory of a third country which imposes obligations on it with respect to the prevention and detection of legalization and terrorist financing that are equivalent to the obligations established by the Act and it is subject to disclosure requirements equivalent to the requirements under a special regulation;
  - d) To the extent of identification and verification of identification of the Beneficial Owner if a pooled account is managed by a notary or an advocate who operates in a Member State or a third country which imposes obligations with respect to the prevention and detection of legalization and terrorist financing that are equivalent to the obligations established by the Act and if the data on identification of the Beneficial Owner are available, upon request, to the obliged entity that maintains the account;
  - e) If the Customer is a public authority;
  - f) If the Customer is a public authority and if
    - i. It has been entrusted with public functions under the European Union Treaty and the Treaty on the Functioning of the European Union,
    - ii. Its identification data are publicly available, transparent and there are no doubts about their correctness,
    - iii. its activity is transparent,
    - iv. its bookkeeping provides an accurate and true view of the subject matter of the bookkeeping and its financial standing, and



- v. it accounts to a European Union authority or a Member State authority or other appropriate procedures exist which ensure control of its activity.
3. If the above captioned does not apply, then the obligation to perform simplified customer due diligence may also be performed for the types of transactions that constitute a low risk of their being exploited for legalization or terrorist financing and meet the following conditions:
- a) the contract on the provision of the type of transaction is in writing ,
  - b) payments within the type of transaction provided are carried out solely via an account held in the Customer's name in a credit institution in a Member State or a third country which takes measures with regards to the prevention and detection of legalization and terrorist financing equivalent to measures established by this Act;
  - c) neither the type of transaction nor payments within the scope of the type of transaction are anonymous and their nature enables detection of a UBT,
  - d) a maximum limit in the amount of €15,000 is determined for the type of a payment service,
  - e) when terminating an account, the transfer of the balance cannot be executed for the benefit of a third party, except cases of death, disability, the attainment of a pre-determined age or another similar event;
  - f) where concerning the types of payment services which allow transfer of Customer's funds for investments into financial assets or receivables including insurance or another type of contingent receivables,:
    - i. proceeds may be realized only in the long term period;
    - ii. the financial service provided cannot be used as a guarantee;
    - iii. the financial service does not allow express payments and the contractual relationship cannot be rescinded or terminated prematurely.

## **Article 5**

### **Enhanced Customer Due Diligence**

1. The enhanced customer due diligence must be performed if, based on a risk assessment under Article 10 (4) of the Act, a Customer or a payment service constitutes a higher risk of the legalization of terrorist financing, or every time a Framework Contract on provision of payment services is entered into. NFD shall perform enhanced customer due diligence for each cross-border correspondent relationship of a Credit Institution and a Financial Institution with a partner institution of a third country, when performing a payment service to a Politically Exposed Person or a person residing in a third country that was identified as high risk by the European Commission.
2. When performing enhanced customer due diligence, NFD will also perform, apart from basic customer due diligence, other measures depending on the risk of legalization or terrorist financing. If the risk assessment under Article 10(4) of the Act concludes that it is necessary to perform enhanced customer due diligence and the Customer is not physically present for the purposes of identification and verification of identification to the following extent:
  - a) performing the customer's identification by means of additional documents, data or information and executing further measures to verify or certify the documents submitted;
  - b) requesting of a written confirmation from another bank, a foreign bank operating on the territory of a Member State or a financial institution stating that the Customer is its customer, or
  - c) ensuring that the first payment is executed through a Customer's account if the Customer provided a document proving the existence of such account.

In case of cross-border correspondent banking relationship with a credit institution from a third country or a person residing in a country that the European Commission identified as high risk to the following extent:

- a) collecting information about a partner credit institution for the purpose of determining the nature of its business and determining its reputation and efficiency of supervision from publicly available information,
- b) assessing control mechanisms of a partner credit institution in the area of the prevention and detection of legalization and terrorist financing,
- c) obtaining approval of a statutory body member or a designated person under Article 20 (2)(h) before establishing a new correspondent banking relationship;
- d) ascertaining the partner credit institution's authorizations to perform its activities,
- e) in case of payments through the account, ascertaining whether a partner credit institution has verified the identification of a Customer and performed basic customer due diligence on the Customer having a direct

access to the partner credit institution's account and whether the partner credit institution is able to provide upon request the relevant data in the extent of basic customer due diligence;

in case of a transaction with a politically exposed person to the following extent:

- a) obtaining approval from a statutory body member or a designated person under Article 20(2)(h) before establishing a business relationship with a Politically Exposed Person;
  - b) determining the origin of property and origin of funds used for the business relationship or the transaction;
  - c) ongoing and detailed monitoring of the business relationship;
  - d) notifying the statutory body or a designated person under Article 20(2)(h) before paying out proceeds from an insurance policy.
3. NFD must perform obligations relating to a Politically Exposed Person under Article 6(1) of the Act for at least 12 months of the termination of a prominent public function performance, however, no later than such time when NFD, based on the risk assessment under Article 20a of the Act, rules out the risk specific to the Politically Exposed Person.
  4. On behalf of NFD and pursuant to this internal regulation, the appropriate type of customer due diligence is carried out by:
    - 1) the person responsible for protection against legalization and terrorist financing AP AML
    - 2) employees who may encounter an unusual business transaction in the course of the performance of their work
    - 3) other persons acting on behalf of NFD entering into Framework Contracts on the performance of payment services.

#### **Article 6 Business Account**

1. In case an Applicant is applying for a business account, the AP AML is required to verify whether the subject matter of operations specified in the application is consistent with the actual subject matter of operations specified on the websites of the Applicant or otherwise.
2. The list of operations and activities that the Company considers to be unsupported is included in the document "Appendix – Unsupported and Risky Subject Matters of Operations".
3. If in the applicable form these Applicants list activities that are considered to be risky by the Company, i.e. those which are so defined in the document "Unsupported and Risky Subject Matters of Operations", such application and the extent of potential customer due diligence is determined by the AP AML.
4. Each Applicant must be verified against the Database of persons under Appendix No.5 of this Program, of groups and entities upon which EU sanctions have been imposed. If an Applicant is listed in this Database, the Mandated Employee is required to consider this fact as an unusual business transaction and must perform all measures prescribed by this Program.

#### **Article 7 Verification of Identification**

1. Verification of Identification shall mean:
  - a) In case of a natural person, verification of the data in accordance with the law in his/her identification document if contained therein and verification of the appearance of the person by comparing it to the appearance in his/her identification document in his/her physical presence; in case of a natural person - entrepreneur also verification of the data on the basis of documents, data or information obtained from the official register or other official record keeping system in which the entrepreneur is registered or from other reliable and independent source;
  - b) in case of a legal person, verification of the data on the basis of documents, data or information obtained from the official register or other official record keeping system in which the legal person is registered or from other reliable and independent source and verification of the identity of a natural person who is authorized to act on behalf of the legal person to the extent of the data in accordance with the law and verification of the power to act on behalf of the legal person;
  - c) in case of a person represented by virtue of authorization, verification of his/her data to the extent of data in accordance with the law on the basis of documents, data or information obtained from the submitted

- authorization containing an authenticated signature, the official register or other official record keeping system or other reliable and independent source, and verification of identification of a natural person who is authorized to act on the basis of authorization to the extent as specified by the law;
- d) in case of a minor who possesses no identification document, verification of type and number of the identification document and appearance of the minor's legal guardian present in person by comparing it to his/her appearance in his/her identification document;
  - e) verification of identification number or a code allocated to the Customer by the obliged entity for executing transactions by means of the technical device under a special regulation provided the Customer has already been identified;
  - f) Customer identifying himself by a guaranteed electronic signature provided the Customer has already been identified.
2. Unless otherwise specified in the Act, NFD is required to verify the identification of a Customer who is a natural person and identification of each natural person acting on behalf of a Customer who is a legal person before entering into a business relationship or execution of a transaction in their physical presence.
  3. Verification of a Customer's identification and taking of measures to verify the identification of the Beneficial Owner may be completed during entering into a business relationship if it is necessary to prevent interruption of the normal conduct of business and if there is a low risk of legalization or terrorist financing. In these cases it is necessary to complete verification of a Customer and taking of measures to verify the Beneficial Owner immediately after the Customer's first physical visit to the NFD premises.
  4. Verification of Customer's identification and taking of measures to verify the identification of the Beneficial Owner may be completed after the completion of the business between the Customer and the Credit Institution or after opening an account at the Credit Institution, including accounts that enable trading of transferrable securities, provided that adequate measures are in place to prevent the Customer or anyone else acting on his/her behalf from handling the funds or transferrable securities until such time as the Customer's identification has been verified and measures have been taken to verify the Beneficial Owner.
  5. Verification of identification of a person who is authorized to accept the benefits of a life insurance policy and who is subject to the identification obligation must be completed no later than such time as an authorized person exercises rights he/she has under the terms of a life insurance policy or as a payment is made under an insurance policy.
  6. For the purposes of identification and verification of identification the Ministry of Interior of the Slovak Republic shall secure, through the services of an official authenticator, the verification of NFD's Customer's identity in the same manner as used for the authentication under a special regulation.

## **Article 8 Exemptions**

1. Exemptions from customer due diligence:
  - a) NFD is not required to perform customer due diligence under Article 3 through 5 in the following cases:
    - 1) Concerning electronic funds kept on a payment device which is not possible to repeatedly recharge and the maximum stored amount:
      - i. does not exceed €250, or
      - ii. does not exceed €500 if it concerns electronic funds that may be used only in the territory of the Slovak Republic;
    - 2) electronic funds kept on a payment device that may be repeatedly recharged and the highest deposit amount or the total amount of outgoing payments does not exceed €250, or
    - 3) payment services provided by means of public electronic communication network without the use of electronic funds as long as the amount of a single transaction does not exceed €30 and at the same time the total monthly limit of payments realized from one phone number does not exceed €250.
  - b) Payment devices under paragraph 1 may be used exclusively for the purchase of goods or services and may not be financed by anonymous electronic funds.
  - c) In case of an exchange for cash or a cash withdrawal of funds in the amount exceeding €100, it is not possible to use the provision from paragraph 1.
  - d) NFD is required to perform monitoring of transactions or business relationships in such a way as to be able to detect a potential UBT.
2. Any exemption when entering into a business relationship may be given solely by the AP AML and only to the extent that such exemption does not violate the Act.

## **Article 9 The manner of Risk Assessment and Monitoring**

NFD is required to monitor all transaction with regards to the risk of legalization or terrorist financing.

The risk of legalization or terrorist financing for the purposes of the Act must be assessed in relation to:

- the Customer's person;
- the subject matter of Customer's operations;
- the type of financial service he/she is interested in;
- achievement of the objective he/she is pursuing by means of this financial service;
- the profit from this financial service for the Customer;
- Customer's financial situation;
- other financial services he/she uses and are known;
- personal experience with Customer's activity;
- publicly available and known facts about the Customer;
- all other information obtained from employees, business representatives and third persons who through their activities participate in the financial intermediation.

In case of qualified consideration it is necessary to proceed with professional diligence, i.e. in case there are any suspicions of the risk of legalization or terrorist financing it is necessary to obtain all available data for assessing the seriousness of such risk and subsequently decide on further steps.

In connection with the assessment of the seriousness of the risk there are concrete risks that constitute:

- 1) higher risk Customer, e.g. Customer residing or living in a tax haven, Customer operating gambling games, Customer who in the last 12 months changed his/her place of registered offices or his/her statutory representatives more than twice;
- 2) higher risk transaction, e.g. transaction that has previously been reported and the obliged entity decided to include the Customer who carried out the transaction in the higher risk category.

Therefore it is necessary to verify each suspicion or doubt with regard to a Customer in the extent necessary to determine whether the activity of such Customer is considered to be a UBT or whether the financial service will be provided without considering the Customer's activity to be a UBT.

## **Article 10 Procedure for Assessment and Detection of UBT and Risk Management**

1. When assessing anomalies of a payment operation that is being prepared or provided, it is always necessary to pay closer attention to:
  - each complex and unusually large Customer-requested payment service and all other requests of the Customer, transactions of unusual nature that have no apparent economic purpose or no apparent legal purpose, in which cases it is necessary to inspect as much as possible the objective of such transactions; each risk of legalization or terrorist financing that may arise out of the requested payment service or new technological processes used to provide it that may support anonymity, and it is required to take adequate measures if it is necessary to prevent their use for the purposes of legalization and terrorist financing .
2. When performing enhanced customer due diligence, it is necessary to take into account any higher risk factors:
  - a) with regards to the Customer:
    - 1) business relationship is conducted in unusual circumstances;
    - 2) Customers who reside in geographical areas with a higher risk specified in the third point;
    - 3) legal persons or persons without legal personality who serve as a means to possess personal property;
    - 4) companies where authorized shareholders may operate, or companies that issue bearer shares;
    - 5) Customer extensively uses cash for his/her business operations; or
    - 6) Customer's ownership structure appears to be unusual or excessively complex with regards to the nature of his/her business operations.
  - b) from the point of view of product, services, business or distribution channel:
    - 1) use of private banking services;
    - 2) products or transactions that might be favorable to anonymity,
    - 3) transactions or business relationships where the Customer is not physically present and that are missing some security features such as electronic signature;
    - 4) payment received from unknown or unassociated third parties; or
    - 5) new products and new business procedures including new distributions systems and use of new or developing technologies for new or existing products.
  - c) from a geographical point of view:
    - 1) countries, that the European Commission identified as high risk and countries which based on information from trustworthy sources do not have effective systems in place against legalization or terrorist financing;
    - 2) based on information from trustworthy sources, countries identified as having a significant level of corruption or other criminal activities;
    - 3) countries subject to sanctions, embargos, or other similar measures imposed by e.g. the European Union or the United Nations; or
    - 4) countries providing financial means or support to terrorist activities or countries where identified terrorist organizations operate.

A written or electronic record is made about each UBT which it is required to have available during an inspection performed by the FIU.

#### **Article 11**

##### **Procedure to be Followed after Detecting Unusual Business Transaction until its Immediate Reporting to FIU, including Procedure to be Followed by and Responsibilities of Employees who Asses Such UBT**

1. In case a Mandated Employee identifies an Unusual Business Transaction during monitoring of an ongoing transaction (i.e. an incoming transaction waiting to be assigned to a Customer or outgoing transaction to be deducted from a Customer's account), he/she submits this UBT to be assessed by the AP AML. In suspected cases of an unusual business transaction an obligation arises:
  - a) to immediately stop the execution of the payment operation, terminate business relationship, if:
    - i. the obliged person cannot perform customer due diligence in the extent specified in Article 3 (1) a) through c) of this Program as a result of the Customer's actions, or
    - ii. the Customer refuses to prove on behalf of whom he/she acts.
  - b) to proceed with professional care and perform enhanced customer due diligence with the objective to obtain as much information as possible;
  - c) to consult own activities without any undue delay with the AP AML – the person responsible for protection against legalization and terrorist financing. To follow instructions received from this person and, in cases identified by this person, to refuse execution of a specific transaction;
  - d) not to inform other persons of own findings in order to ensure own protection and that of third persons;

- e) not to perform any investigative, surveillance or any other activities, such as activities relating to a gathering of generally available information, i.e. activities performance of which is the responsibility of the appropriate public authorities;
  - f) to immediately contact the Customer if there is a suspicion that a transaction may be UBT in order to clarify the specific financial transaction, i.e. where he/she is sending the money from, who the owner of the account is where the money is coming from, subsequently the purpose for which he/she is sending the funds and finally where or to whom the Customer is sending the funds. In case an unambiguous clarification of these circumstances is provided, which is in accordance with the law, it is not necessary to contact the FIU and simultaneously assess this transaction as unusual;
  - g) if there is a suspicion that a transaction is a UBT, to examine without any undue delay Customer's payment history and verify whether in the past such Customer was subject to review with regards to UBT by a person responsible for protection against legalization and terrorist financing or the FIU. In case such Customer was under review in the past, the transaction is the same type of transaction with the same payment recipient and the risk of legalization or terrorist financing was already ruled out, then it is not necessary to consider this financial transaction as unusual and the obligation specified in paragraph f) of this Article is canceled and the financial service may proceed.
2. This Program must be made available to each employee, and especially to the Mandated Employee, during the performance of his/her activities. NFD shall keep confidential each reported UBT and all measures taken by the FIU.
  3. Also each employee of NFD who reported a UBT on behalf of NFD which acts on the basis of another contractual relationship must keep such facts confidential.
  4. The duty of confidentiality of the above mentioned persons does not cease by the termination of employment, equivalent business relationship or other contractual relationship.
  5. The FIU may release NFD from the confidentiality obligation when the following proceedings are concerned:
    - a) before law enforcement agencies,
    - b) before a court of law ruling in civil proceedings.
  6. Any breach of obligations specified in the Program and also any violation of the law concerning protection against legalization give rise to liability under Article 234 of the Criminal Code. Compliance with obligations under Act No. 297/2008 Coll. is not limited by the obligation prescribed by law to maintain confidentiality under special provisions.

## **Article 12**

### **Procedure to Be Followed during Postponement of Unusual Business Transaction**

1. AP AML, or another employee authorized by AP AML, shall record a reported operation and assess it on the basis of the risk it poses and knowledge of the Customer as well as the business partner, if it concerns a transaction between accounts maintained by NFD, and subsequently takes the appropriate measures in accordance with Act No.297/2009, especially he/she will decide on:
  - a) performance of the transaction in accordance with the Customer's instructions since he/she does not consider such transaction to be unusual;
  - b) reporting the transaction to the Financial Intelligence Unit (the "FIU");
  - c) refusal to execute the transaction;
  - d) temporary suspension of all activity on the account or accounts of the Customer;
  - e) asking the Customer to provide additional information. Based on the Customer's explanation, the AP AML, or an employee authorized by the AP AML, will decide in accordance with which of the letters above to proceed.
2. A transaction that has been assessed as unusual may not be executed unless the AP AML decides that it may. An electronic or a written record of this decision must be made and such record shall also be recorded in a report for the FIU.
3. NFD is obligated to postpone a UBT if there is a danger that its execution may hamper or substantially impede seizure of proceeds from criminal activities or funds intended to finance terrorism, or if so requested by the FIU in writing, until receipt of notification from the FIU to carry out the transaction, but for no more than 120 hours. If the FIU advises that it forwarded the matter to the law enforcement agencies, the UBT may be postponed for another 72 hours. This period does not include Saturdays and non-working days.
4. In case a UBT was detected during a follow-up monitoring, the Mandated Employee shall submit such finding to the AP AML, or another employee authorized by the AP AML, who after recording it shall decide on:
  - a) assessment of the transaction as usual;
  - b) reporting the transaction to FIU;
  - c) temporary suspension of all activities on the account or accounts of the Customer;
  - d) asking the Customer to provide additional information. Based on the Customer's explanation the AP AML, or an employee authorized by the AP AML, will decide in accordance with which of the letters above to proceed.

5. Activities that need to be reported to the FIU are reported by the AP AML or a person authorized by the AP AML.
6. In case the AP AML, or a person authorized by the AP AML, decides to temporarily suspend all activities on the Customer's accounts, any further activities on such account may be executed only with the express consent of the AP AML.
7. If for operational or technical reasons it is not possible to postpone a UBT, the obliged person shall inform the FIU of this fact. The obliged person shall not postpone a UBT if such postponement might, based on a previous notification to the FIU, hamper the execution of the UBT.
8. In case the Customer's activity was reported to the FIU as suspicious, all persons within the Company who have knowledge of this fact are obligated to keep reports of suspicious operations confidential from third persons, including persons to whom such information relates.
9. Report on Unusual Business Transaction shall include:
  - a) business name, registered offices or place of operations, and identification number of obliged person;
  - b) data obtained from identification of persons to whom the UBT relates;
  - c) data on UBT, especially reason why it is considered unusual, the timeline of events, account numbers, information about when the accounts were open, who the owner is and who has the right of disposal, photocopies of contracts and other related documents and information, as well as other information that may relate to the UBT and is significant for its further assessment;
  - d) data on third persons possessing information on the UBT,
  - e) first and last name of a person under Article 20 (2) h) of the Act and a phone number for such person.
10. A UBT report must not contain any information about the employee who detected it. The Company is obligated to keep confidential and not make public any personal data about the employee who detected the UBT.

### **Article 13**

#### **Procedure for Data Keeping**

1. The Company will keep a separate file for each Customer that will include the following:
  - a) documents relating to the identification of the Customer under Article 2 Identification of Customer;
  - b) Contract and all its Appendices and Addenda;
  - c) results of Customer monitoring, including FIU reports;
  - d) exemptions granted to Customer by the AP AML.
  - e) other documents at the AP AML's discretion.
2. Only the AP AML and authorized persons may access Customer's file.
3. The Company is required to archive each file for the period of five years following the termination of the business relationship with the Customer. After this time period has passed, and if the AP AML does not specify otherwise, Customer's entire file is destroyed by means of shredding.
4. This provision does not apply to the Company's obligation to keep records of all executed transactions. All information and results obtained (including e-mail communication and all attachments) are recorded in a file relating to the performance of specific customer due diligence and are archived in accordance with Registry Procedures for Filing Management.

### **Article 14**

#### **Persons Responsible for Protection against Legalization of Proceeds from Criminal Activity.**

1. The person responsible for protection against legalization and terrorist financing who ensures reporting of unusual business transactions and ongoing contact with the FIU is: AP AML: František Repka, e-mail: [Frantisek.repka@lfci.eu](mailto:Frantisek.repka@lfci.eu), phone: 0902 953 344, DAP AML: Ing. Peter Zágora, e-mail: [aml@pay-institution.eu](mailto:aml@pay-institution.eu), phone: 0911 039 085.
2. Monitoring of Customer's activities is a responsibility of a Mandated Employee who has been designated by the AP AML.
3. The reporting duty must be carried out without any undue delay (it includes a suspicion that a transaction may be a UBT, as well as obligation to report the postponement of a UBT, refusal to execute a UBT, or its execution in case it was not possible to postpone it) and it is fulfilled by filing a report of an unusual business transaction in a way that ensures that information contained in it shall remain confidential from an unauthorized person, i.e. in one of the following ways:
  - in person (Račianska 45, 832 23 Bratislava)
  - in writing (Financial Information Unit/Finančná spravodajská jednotka, Pribinova 2, 812 72 Bratislava)
  - in electronic form ([sjfpnoo@minv.sk](mailto:sjfpnoo@minv.sk))

- by telephone (09610/514 19) if the matter is urgent; such report must be also made in person, in writing or in electronic form within 3 days of the FIU's receipt of such phone report
4. Upon written request, the report of an unusual business transaction must be completed to include requested information and further related and requested documentation about the UBT must be provided.
  5. Compliance with the obligation to report an unusual business transaction to the FIU under paragraph 1 is not limited by the obligation prescribed by the Act to maintain confidentiality under special provisions.
  6. By reporting an unusual business transaction the obligation to report facts indicating that a criminal act has been committed is not affected.
  7. The AP AML is required to perform direct process control and be constantly responsible for compliance with the Act and relevant legislation as well as the capability to prove compliance with current legislation at any point in the course of NFD's operations.
  8. The AP AML regularly informs the NFD's statutory, supervisory and auditing bodies of his/her activities; upon request, if required or in case of non-compliance or suspicion of non-compliance, or at least once a year.

#### **Article 15**

##### **Means of Ensuring Protection for Employee Detecting Unusual Business Transaction**

1. An employee, as well as other persons acting on behalf of NFD, who detects UBT reports and consults his/her findings and suspicions only with the person specified in Article 14. This person is required to:
  - a) provide the employee as well as other collaborating persons with required explanations and advice with regards to assessment as to whether the transaction in question is an unusual transaction, with regards to investigating it and taking necessary measures;
  - b) to manage the notifier's course of action during execution of a transaction where suspicions arose about its unusual nature,
  - c) maintain confidentiality about who reported the facts indicating that a transaction is unusual,
  - d) assess risks connected with continuing a transaction where suspicions arose about its unusual nature especially with regards to the personal safety of the notifier, or other affected persons, and potentially suspend such transaction or terminate it.

#### **Article 16**

##### **Special Training of Employees and Mandated Persons and Means of Conducting Inspections of Compliance with this Program.**

1. NFD is required to conduct at least once a year a special training for all employees and Mandated Persons relating to protection against legalization of proceeds from criminal activity. With respect to new employees or Mandated Persons, the Company is required to provide such training to them without any undue delay.
2. The content of such special training shall include mainly education on the content of the Act, the rights and obligations of employees and Mandated Persons under the Act and internal regulations of the Company and sanctions for non-compliance with the obligations specified by the Act and/or internal regulations of the Company.
3. Upon completion of such special training, the Company shall issue a written record which shall include:
  - a) location and date when the special training took place;
  - b) the content of the training;
  - c) first and last names, positions and handwritten signatures of persons who participated in the training;
  - d) first and last name and a handwritten signature of a person who conducted the training.
4. Inspection of compliance with the Program and obligations arising out of the Act shall be conducted in the following extent and by the following persons:
  - a) A person specified as the AP AML of this Program – ensures an inspection is carried out, as necessary but at least once a month, on a selected sample of transactions as to whether the conditions set in the Act and in this Program were met;
  - b) Members of the Board of Supervisors and the Management Board in the extent to which the transactions relate to the tasks they were entrusted with by the Management Board of NFD;
  - c) during the daily inspection the process manager examines whether standard operating procedures are observed as well as procedures to be followed in case of occurrence and detection of UBT.

#### **Article 17**

##### **Program Update**



1. The AP AML is required to review the Program and its Appendices as a whole with regards to how current and effective it is at least once a year, apart from the list of high-risk countries which must be updated at least once in 3 months, and the database of persons, groups and entities upon which EU sanctions have been imposed for which the update frequency is specified in Appendix 5.
2. The Appendices to this Program consist of the following documents:
  - a) The List of High-risk Countries – Appendix 1;
  - b) Basic Due Diligence – Natural and Legal Persons – Appendix 2;
  - c) Enhanced Due Diligence – Natural and Legal Persons – Appendix 3
  - d) Unsupported and Risky Subject Matters of Operations – Appendix 4
  - e) Database of Persons, Groups, and Entities upon Which EU Sanctions Have Been Imposed – Appendix 5
  - f) Criteria of Suspicious Transactions – Appendix 6
  - g) Declaration of the Beneficiary Owner
  - h) Solemn Declaration on Politically Exposed Person
  - i) Specimen Signature

The Appendices listed have been updated effective today and form part of this Program. Any Appendix may be updated by the Company individually, usually upon request of the AP AML, however, it must be dated and signed by the Company's Management Board.

### **Article 18 Final Provisions**

1. This Program as it has been drawn is binding for all employees and Mandated Persons who are required to comply with it and in their daily reporting include a list and description of situations covered by this Program.
2. The Company shall ensure compliance with the Program and inspection of such compliance..
3. The Company shall impose disciplinary sanctions in the event of non-compliance with the Program, in accordance with special provisions.

Updated January 14, 2019, amendments approved at the general meeting of the Company; comes into effect on the day of registering the amendments in the Commercial Register of the Slovak Republic January 31, 2019.



# Payment Institution

Payment Institution NFD a.s., with registered office at  
Popradská 17/670, Stará Ľubovňa, 064 01, Slovakia, ID: 46 847 162