
**Guidelines on Electronic Know Your Customer
(e-KYC)**



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Preface

Bangladesh is one of the fastest growing economies in the world and looking forward to transforming itself into a developed economy by 2041. The Sustainable Development Goal (SDG) Agenda -1 (one) emphasizes to put in place a sound policies and gender sensitive development strategies for poverty eradication and Agenda 8(10) of the same urges for capacity building of domestic financial institutions to encourage and expand access to banking, insurance and financial services for all. Financial Action Task Force (FATF), an inter governmental and global standards setting body on combating money laundering and financing of terrorism also encourage jurisdictions to pursue financial inclusion through risk based approach.

The **Vision 2021** reaffirms the Bangladesh government commitment to provide financial service at doorstep of the citizens in an easy, faster and low cost manner. In this backdrop, implementation of Electronic Know Your Customer (e-KYC) can contribute to achieve the above mentioned target of SDG Agenda and **Vision 2021**. Additionally, the National Strategy for prevention of Money Laundering and Combating Financing of Terrorism Strategy 2019-2021 published by the Bangladesh Government also has set a comprehensive strategic objective (Strategy No. 08) to promote FinTech and RegTech, financial inclusion and ensuring cyber security. The action item no. 9 of the strategy has set a deadline to implement e-KYC/Digital KYC by December 2020.

Since the digitalization enable easy access of customer, even from the remote location, into the financial services, this may pose some underlying risk of money laundering, terrorism financing and related criminal activities by abusing financial institutions and its services. As such, while preparing this Guideline relevant international best practices are meticulously consulted. Beside the best practices, a multiagency working group led by Executive Director, Bangladesh Bank along with Bangladesh Financial Intelligence Unit (BFIU) worked since 2017 to test the viability of e-KYC in Bangladesh. Therefore, the working group has completed hands on nationwide pilot project on e-KYC

participated by 18 banks and 01 non-bank financial institutions. This pilot project covers customer onboarding using biometrics and different technologies, where customer's identity was checked by using National Identification (NID) card issued by National Identity Registration Wing (NIDW) of Election Commission (EC) of Bangladesh. The technologies used in the pilot project were fingerprint devices, face matching devices, artificial intelligence, optical character recognition (both in Bangla and English) and so on. In the pilot project, the average rate of successful on-boarding has been found to be higher for the fingerprint technology than the facial matching technology. The draft report of the pilot project also acknowledged that the success rate of customer on-boarding through fingerprint and face matching technology might increase based on the institutional capacity and the training.

The data provided by the institutions showed that the e-KYC can save time of onboarding from 4-5 days to 5-6 minutes, cost of customer onboarding and KYC reduces 5-10 times and the growth of business (in particular to the client base) is around 25% compared to the traditional onboarding and KYC mechanism.

Therefore, the BFIU issued this Guideline for the financial institutions including banks, non-bank financial institutions, insurance companies, capital market intermediaries, MFS, DFS and the other companies licensed by the Bangladesh Bank under the power conferred in the Section 23(1)(d) of the Money Laundering Prevention Act, 2012 and the Section 15(1)(d) of the Anti Terrorism Act, 2009. The BFIU expects every financial institution to implement this Guideline by December 2020 to enhance their service capacity by reducing cost and time and achieve steady business growth. Subsequently, prevent any misuse of their products, services and delivery channels from money laundering, terrorist financing and relevant predicate crimes. The financial institutions are free to choose required technology and any suggested models mentioned in this Guideline, however, they have to follow every steps of the chosen model.

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Abbreviations

AI	Artificial Intelligence
BB	Bangladesh Bank
BFIU	Bangladesh Financial Intelligence Unit
BTRC	Bangladesh Telecommunication Regulatory Commission
CDD	Customer Due Diligence
CDBL	Central Repository of Bangladesh Limited
DNFBPs	Designated Non-Financial Business and Professions
e-KYC	Electronic Know Your Customer
FATF	Financial Action Task Force
KYC	Know Your Customer
MFS	Mobile Financial Service
ML/TF	Money Laundering & Terrorism Financing
NRA	National ML/TF Risk and Vulnerability Assessment
NID	National Identification Database
OCR	Optical Characteristic Recognition
SDD	Simplified Due Diligence
SIM	Subscriber Identity Module
SDG	Sustainable Development Goal
2FA	Two Factor Authentication

Introduction

1.1 Background

The concept of Know Your Customer (KYC) within the financial sector and Designated Non -Financial Business and Professions (DNFBPs) started only few decades back. It has got momentum when FATF came forward with a set of recommendations for prevention of money laundering and financing of terrorism. Within the FATF standards KYC had been emerged as one of the main preventive measures or tools to protect financial institutions abusing from criminal activities.

The FATF Recommendation no. 10 requires financial institutions to conduct KYC, Customer Due Diligence (CDD) either simplified or enhanced based on the customer risk profile as well as on-going CDD measures. It also requires that CDD should be undertaken by the financial institutions while establishing business relationship with customer.

The CDD measures to be taken by the financial institutions as per the FATF standards are as follows:

- (a) Identifying the customer and verifying that customer's identity using reliable, independent source documents, data or information;
- (b) Identifying the beneficial owner and taking reasonable measures to verify the identity of the beneficial owner, as such that the financial institution is satisfied that it knows who the beneficial owner is. For legal persons and arrangements this should include financial institutions understanding the ownership and control structure of the customer.
- (c) Understanding and, as appropriate, obtaining information on the purpose and intended nature of the business relationship;
- (d) Conducting ongoing due diligence on the business relationship and scrutiny of transactions undertaken throughout the course of that relationship to ensure that the transactions being conducted are consistent with the institution's knowledge of the customer, their

business and risk profile, including, where necessary, the source of fund. The Financial institutions should be required to apply each of the CDD measures and should determine the extent of such measures using a risk-based approach (RBA) in accordance with the Interpretive Notes to this Recommendation. The relevant identification data may be obtained from a public register, from the customer or from other reliable and independent sources.

In 2017, the FATF provided a specific supplement to the 2013 Guidance on AML/CFT Measures and financial inclusion, focusing specifically on CDD and financial inclusion. The Guideline highlights risk mitigation measures that Financial Institutions' should apply commensurate with the nature and level of risks identified, to mitigate the risks. It also presents different CDD approaches which can be implemented to facilitate financial inclusion and remove obstacles linked to the verification of the customer's identity, either a broad understanding of the reliable and independent source of information or simplified due diligence measures. Where the risks of ML and TF are lower, one or more of the digital ID system's basic processes, may be less reliable (i.e., have a lower assurance level) would still satisfy the requirements of Recommendation 10.

FATF standards are applicable for both traditional and digital financial services. The digital financial services cover financial products and services, including payments, transfers, savings, credit, insurance and securities. They are delivered via digital/electronic technology such as e-money (initiated either online or on a mobile phone), payment cards and regular bank accounts.

In Bangladesh, section 25 of Money Laundering Prevention Act (MLPA), 2012 requires financial institutions to collect complete and correct identity of customer while establishing business relationship with its potential customer. The Rule 6 to 12 of the Money Laundering Prevention (MLP) Rules 2019 provides a detail framework to conduct customer due diligence for the financial institutions, where Rule no. 10 provides the legal basis to adopt risk based approach in case of customer due diligence, i.e. application of

simplified measures for lower risk scenario and vis-à-vis enhanced measures for higher risk scenario. With the spirit of those laws, Bangladesh Financial Intelligence Unit (BFIU) has issued several circulars and circular letters instructing the financial institutions' to conduct know your customer programs, which starts from customer onboarding.

Digital financial products and services, and digital identity solutions have developed significantly over the last several years and have major potential to facilitate access to basic services for unserved and underserved people and businesses, especially in emerging and developing countries. The development of branchless banking channels through non-bank agents (e.g. computer shops, mobile phone shops, commission agent business, grocery stores etc.), combined with mobile phone solutions, and e-money accounts have helped to reach vast groups of citizen and offer them basic, but regulated financial services.

In several countries, the expansion of digital financial services has been supported by the implementation of a tiered KYC approach. However, in Bangladesh for lower threshold of transaction and limited wallet size and considering proven low risk, BFIU directed for Simplified Due Diligence (SDD) for mobile financial services, digital financial services and other low or limited risks banking, insurance and securities products. The scope of the applicable measures of SDD is limited and it applies only when the products or service are assessed low risk.

The lower ML/TF risk situations may permit the use of digital ID systems for the purposes of simplified due diligence, for example, when the ML/TF risks of potential customers are lower, a digital ID system for identity proofing may be appropriate. Conversely, for higher ML/TF risk situations, financial institutions may adopt additional independent means of reliable information to verify customers' identity details. It is also observed in several countries that several low risk accounts are being created and ultimately controlled by one bad actor. Therefore, additional measures are required to ensure that this type of ML/TF risk is mitigated, for example, putting restrictions on the use of the account.

In Bangladesh, Election Commission of Bangladesh holds the citizens (18 years and above) identity data with their biometrics has higher level of assurance and authenticity, where, the financial institutions' can have access to check the authenticity of customer provided identity data and bio-metrics by using this database. Therefore, this e-KYC Guideline is based on the national ID card and the bio-metrics data stored against each NID card.

This e-KYC guideline contains a set of instructions for the financial institutions to enable them to conduct customer due diligence in a digital means.

1.2 Scope

This Guideline shall be known as Electronic Know Your Customer (e-KYC) Guidelines which deals with electronic customer onboarding, identification and verification of customer identity, creating of customer digital KYC profile as well as risk grading of customer in a digital means. The scope of this Guideline will be as follows:

- (a) The provisions of this Guideline shall be applicable only for natural person;
- (b) The requirements of this guideline shall be applicable based on the risk exposures of the customers of the financial institutions. For example, for an assessed low risk customer, financial institution shall be required to conduct simplified e-KYC which includes electronic customer onboarding, verify customer identity and preserve customer profile digitally, whereas, financial institution shall be required to conduct regular and enhanced e-KYC which includes electronic customer onboarding, verify customer identity, preserve KYC and risk grading in a digital manner for a customer with a regular and higher risks scenario;
- (c) The e-KYC requirement of this Guideline is based on the biometric verification; therefore, a client whose status is legal person or legal arrangement excluded from the obligation of this Guideline. In this case, KYC and CDD norms for the legal person or legal arrangement shall be undertaken as per the provisions of the MLPA 2012, Anti-Terrorism Act

(ATA), 2009, the MLP Rules, 2019, Anti Terrorism (AT) Rules 2013; and instructions contained in the circulars and guidelines issued the BFIU time to time.

(d) Where e-KYC attempts failed due to any technical reason, the traditional KYC approach should be followed for the natural person.

1.3 Objectives

The key objective of promoting e-KYC is that it can provide an ample scope of quick onboarding of customer by verifying customer identity through digital means which can leverage saving of time and provide ease both for the client and service providers. Additionally, e-KYC can save institutional cost as well as foster growth of customer base compare to the traditional growth. Therefore, the basic objectives of implementing e-KYC are as follows:

- Establish good governance within the financial industry;
- Enhancing the growth of financial inclusion;
- Protect financial sector from abuse of criminal activities;
- Ensure integrity and stability of the financial sector;
- Manage ML/TF risks;
- Reduction of cost related to customer on boarding and managing CDD;
- Promote fintech services; and
- Participate in the national level well-being.

2.E-KYC Process

2.1 Definitions

E-KYC is a combination of paperless customer onboarding, promptly identifying and verifying customer identity, maintaining KYC profile in a digital form and determining customer risk grading through digital means. It is a faster process of doing KYC of customer verifying his/her identity document or bio-metric data.

The e-KYC module can be divided into following two types¹ based on the customer's risk exposures:

- (a) **Simplified e-KYC:** Where a customer can be onboarded and verifying customer identity electronically using simplified digital KYC form in case of proven lower risk scenario. No risk grading will be required while onboarding of customer. However, sanction screening should be undertaken and KYC review shall be done every five years; and
- (b) **Regular e-KYC:** Where a customer can be onboarded and verifying customer identity electronically, a prescribed digital KYC required to be filled in and stored as well as a risk grading exercise required to be documented. However, based on the risk grading exercise where customer rated as high risk or some specific scenarios (for example. PEPs), some Enhanced Customer Due Diligence (EDD)² required to be undertaken as per provided sample in the section 6.2 of this Guideline.

2.2 Process

The traditional KYC process requires to be filled in the KYC form and collect photo ID and signature of the customers along with required documents. All the way it's a manual process. However, e-KYC is a digital process where financial institutions can open a customer account by filling

¹ This guideline suggested two types of biometrics i.e. fingerprint and face matching, however, if the infrastructure permit Financial Institution can introduce other type of biometric for example iris.

² The EDD measures should include collection of additional information, monitoring of account activity and approval from Chief AML/CFT Compliance officer

up a digital form, taking photograph on the spot, and authenticate the customer's identification data (ID No., biometric information, address proof) instantaneously. Such bio metric information or digital signatures or electronic signatures may be used for transaction authentication as well. The customer onboarding process may undertake via followings means:

- (a) **Assisted customer onboarding:** Where a financial institution or its nominated agent or third-party visit customer or customer visit financial institution or its nominated agent or third party's premises and open account with the direct assistance of financial institution or its nominated agent or third party; and
- (b) **Self check- in:** Where customer can on board at his own by using kiosk, smart phone, computer or other digital means abiding by the norms of this e-KYC Guidelines. Self check in shall be allowed for face matching model only as described section 3.3 of this Guideline.

2.3 Applicability

e-KYC shall only be applicable for natural person who have valid NID document. Natural person without NID and a legal entity or arrangement has to follow the KYC norms as prescribed by the BFIU from time to time. Therefore, 'simplified' and 'regular' e-KYC norms shall be applicable based on threshold and risk mentioned in this Guideline. As such this Guideline applicable for the Bank, Non- Bank Financial Institutions, Insurance Companies, Capital Market Intermediaries and the other companies licensed by the Bangladesh Bank, herein after in this Guideline will be referred as financial institutions. The threshold mentioned in this Guideline may be changed from time to time by the BFIU. The financial institutions shall conduct paper based customer onboarding and simplified or regular KYC and CDD measures if any customer unable to onboard with this e-KYC mechanism.

2.31. Simplified e-KYC

The scope of simplified e-KYC covers the followings which may be revised by the BFIU based on identified risk and consultation with relevant stakeholders from time to time:

a) Digital Financial services

- Mobile Financial Services (MFS) approved by Bangladesh Bank;
- Payment Service Providers (PSPs) approved by Bangladesh Bank;
- Payment Services Operators (PSO) approved by Bangladesh Bank; and
- Fintech Companies with a proven low risk scenario.

b) Financial inclusion products

- Subsidy and allowances paid by the Government under its safety net programs (G2P);
- All receipt by the government (P2G);
- Existing financial inclusion products.

c) Agent banking products:

- Existing agent banking products within the transaction limits set by the Bangladesh Bank time to time

d) Banking products:

- Deposit or Withdrawal not exceeding BDT 1,00,000 per month in a checking account;
- Term Deposit upto. BDT 10,00,000;
- Special deposit scheme with maturity value upto exceeding BDT 10,00,000

e) Non-Bank Financial institutions Products:

- Any type of NBFIs products not exceeding BDT 10,00,000;

f) Securities Market Products³:

- Deposit to the BO account up to BDT 15,00,000;

g) Insurance Products⁴:

- **Life Insurance:** The sum assured within the range of BDT 3,00,000 - 20,00,000 with an annual premium shall not be exceeds BDT 2,50,000.

³ This includes customer initial deposit plus amount transferred through link account.

⁴ Any sum insured lower than BDT 3,00,000 for life insurance and any sum premium lower than BDT 20,000 will be given flexibility to follow this e-KYC regulation. However, it is encouraged to use digital onboarding in such case by using at least a photo ID document.

- **Non-Life Insurance:** Any sum premium not exceeding BDT 20,000 -250,000.

2.3.2 Regular e-KYC

The scope of regular e-KYC covers the followings:

a) Agent banking accounts:

- When agent banking customer performed transaction with the branch as a regular customer;

b) Banking products:

- Other banking products except the banking products mentioned in section 2.3.1(d);

c) Non-Bank Financial institutions Products:

- Any type of NBFIs products exceeding BDT 10,00,000;

d) Securities Market Products:

- Deposit to the BO account exceeds BDT 15,00,000;

e) Insurance Products:

- **Life Insurance:** Any sum assured exceeds BDT 3,00,000 - 20, 00,000 and/or any annual premium exceeds BDT 2, 50,000.
- **Non-Life Insurance:** Any sum premium exceeds BDT 20,000 -250,000.

3. Customer Onboarding-Simplified

3.1 Customer onboarding models

The financial institutions' are allowed to follow customer boarding under this Guidance which is based on national identification document, information stored within a specific NID plus any one of the bio-metric verification out of fingerprint matching, face matching, voice matching and iris matching⁵. The customer onboarding should also be covered self check-in, check in with assistance of service providers and other relevant means as required necessary.

An electronic customer onboarding involves multiple activities. An efficient customer onboarding starts from clients' identity information and can be segmented into following steps:

- a) Data capture and generation;
- b) Identity verification;
- c) Sanction and other screening;
- d) Account opening;
- e) Customer profiling (e-KYC Profile); and
- f) Customer risk grading (as applicable).

For the purpose of undertaking e-KYC, this guideline suggests initially following two bio-metric based models of customer onboarding which are as follows:

- (a) Customer onboarding by using fingerprint; and
- (b) Customer onboarding by matching face.

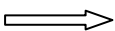
⁵ The financial institutions are free to choose any model based on their preparation and infrastructure.

However, other two models i.e. voice matching and iris matching can also be used if there are sufficient infrastructural and logistics facilities available. Moreover, financial institutions can also introduce other innovative models using biometric beyond these four models having prior approval from BFIU.

3.2 Customer onboarding by using fingerprint

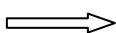
The customer onboarding by using fingerprint matching is one of the commonly used methods where customer fingerprint will be used as a main identifier of a person's identity. The minimum generic approach for this model will be as follows:

(a) Step-one

NID Number:.....	
Date of Birth: (DD/MM/YYYY).....	
Biometric verification.....	Next 

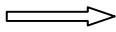
In this step, a customer approaches to a financial institution or its agent or a financial institution or its agent approaches to a customer for account opening or BO account opening or policy opening process using e-KYC. Then, the customer will provide his or her NID. The financial institution or its agent inserts NID number and Date of Birth (DOB) into the specified template and also collects fingerprint, then press Next button. Once the financial institution or its agent presses Next button the information of NID number, DOB and fingerprint data will be matched with NID database, if the data is matched, then next template will be appeared.

(b) Step-two⁶

Applicant's Name:	
Mother's Name:	
Father's Name:	
Spouse Name:	
Gender (M/F/T):	
Profession:	
Mobile Phone Number:	
Present Address:	
Permanent Address:	
Nominee: Relation: Photograph:	Next 

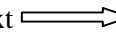
In step two, financial institutions or its agent will insert or punch customer's personal information data as far as possible. It is encouraged that Financial institution use the technology that enable data fetching from the NID and wherever required insert rest other information manually. On completion of personal information, the financial institution or agent will press Next option.

(c) Step-Three

Photograph:	Next 
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In step three, financial institution or its agent or client will capture or upload customer's photograph. However, when there is self check in occurs, then live selfie with proper light and camera frame is required⁷; then press Next option.

(d) Step-Four⁸

Client wet signature or electronic signature or digital signature or PIN.....	Next 
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⁶ This template given here is the minimum information. The financial institutions may add few more fields where necessary (especially for insurance and capital market intermediaries). Where necessary, financial institutions may add additional fields for additional nominee(s) and/ or where additional guardian information required for the minor account.

⁷ There should a mechanism that system only captured real persons' picture only.

⁸ Where necessary, the financial institutions may collect physical signature at the later stage and preserve it digitally for further future use.

In step four, customer wet signature (signature using pen) or customer electronic signatures (signature using devices) or digital signature or personal identification number (PIN) is required to be preserved for future reference.

(e) Step-Five

Account Opening Notification

In step five, after completion of all the processes, system will generate a notification of account opening in process. After completion of necessary sanction and other screening, account opening confirmation notification should be sent to the customer.

The simplified customer onboarding process will be completed once the client gets notification from the financial institution. However, at any point of relationship, the financial institution may ask for additional information from customer and will preserved it in the digital KYC profile of customer.

In case of joint customer (more than one) onboarding the similar process need to be followed. All the field mentioned in step- two is the minimum requirement, however, financial institution especially banks, MFS and non-bank financial institutions may add few fields where necessary. On the other hand, the capital market intermediaries and the insurance companies may add necessary relevant fields as per CDBL requirement and policy proposal form respectively.

3.2.1 Required technology

The electronic customer onboarding and e-KYC process requires technology platform. Therefore, based on the simplified e-KYC model at a minimum, following technology and instruments may be used to complete the process;

- (a) Software/App/Program compatible to the above process;

- (b) Internet connection;
- (c) Online connection to the NID verification server⁹;
- (d) Fingerprint capturing devices;
- (e) Electronic signature capturing devices (where necessary) etc.

3.2.2 Sanction and other screening

The full-fledged account procedures will be completed by completion of sanction and other necessary screening which includes as follows:

- (a) UNSCRs screening;
- (b) Adverse media screening (where necessary); and
- (c) Internal or external exit list (where necessary).

3.2.3 Audit trail of customer profile

To maintain an audit trail, a Financial institution or their nominated third parties required to preserve a digital KYC profile and relevant logbook, even for low risk or financial inclusion products, which should include the followings:

- (a) Customer details (name, contact, address, etc) with photograph;
- (b) Customer ID image (both side);
- (c) Customer signature (where necessary);
- (d) Customer risk review process (once in 5 years);
- (e) Transaction pattern etc; and
- (f) Others information as deemed necessary to complete customer KYC.

⁹ Means NID database either hold by NID Wing of Election Commission and/or Government established any other Authority for identity verification.

The financial institution should maintain a digital log for all successful and unsuccessful client onboarding, matching parameters etc. for further work and audit trail. All the data should be preserved and stored digitally for further both for internal and external audit purposes. The sample e-KYC profile, at a minimum, should be look like as per 6.1.

3.2.4 Matching parameters¹⁰

As the electronic onboarding requires matching customer's ID stored data with the national identification database, the following elements or information required to be matched as per described percentile:

Particulars	Matching Percentage
Applicants' Name	≥ 80%
Date of Birth	100%
Fingerprint	≥ 80%
NID number	100%
Fathers' Name	≥ 80%
Mothers' Name	≥ 80%

3.2.5. Security measures

The financial institution may use additional security measures in the customer onboarding process which may contains checking the phone number by generating PIN codes and other measures as deemed necessary. Additionally, security of data recorded and preserved under this e-KYC should be maintained properly by the Financial institution so that no customer data to be hacked or compromised. This Guideline also suggest to

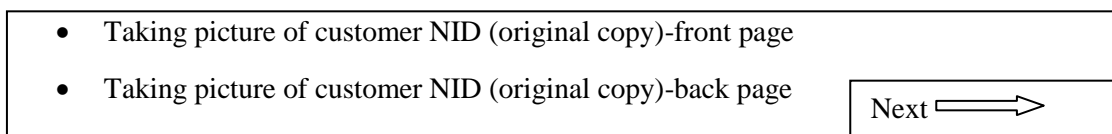
¹⁰ Applicant's name, parent name filled may be left as editable form for correction of spelling mistake, however, date of birth, NID number should be kept in un-editable form.

preserved customer data locally hosted server or cloud sever and put in place necessary data protection and data security measures as prescribed by the prudential and self regulators and/or by the government of Bangladesh.

3.3 Customer onboarding by using face matching

The financial institution may adopt customer onboarding using face matching model where customer face biometrics will be used as a main identifier of a person’s identity along with the national ID number. Following steps will be required for onboarding of a customer by using face matching model:

(a) **Step-one**¹¹



In this step, a customer approaches to a financial institution or its agent or a financial institution or its agent approaches to a customer or customer engaged in self check-in for account opening, or BO account opening or insurance policy opening process by using e-KYC procedures. Then, it requires to capture photograph or scanning front page of the customer NID followed by the back page. An optical character recognition (OCR) should be used to capture the NID data both in Bangla and English. In the back end all NID data will be preserved within specific format.

(b) **Step-two**¹²



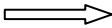
In step two, financial institution or its agent or client will take an appropriate photograph of the customer’s face by using high resolution camera or

¹¹ System should be capable enough to capture front page of NID first, then followed by back page.

¹² There should a mechanism that system only captured real persons’ picture only.

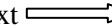
webcam. While taking picture agent or client required to be tactful enough to take the face only of the customer as well as visible quality of the photograph.

(c) Step-Three¹³

Applicant's Name:	
Mother's Name:	
Father's Name:	
Spouse Name:	
Gender (M/F/T):	
Profession:	
Mobile Phone Number:	
Present Address:	
Permanent Address:	
Nominee: Relation: Photograph:	Next 

In step three, all necessary information will be fetched up in the above digital format. Furthermore, additional input may be punched to fulfill the whole template.

(d) Step-Four¹⁴

Client wet signature or electronic signature or digital signature or PIN.....	Next 
---	--

In step four, customer wet signature (signature using pen) or customer electronic signatures (signature using devices) or digital signature or personal identification number (PIN) is required to be preserved for future reference.

(e) Step-Five

Account Opening Notification

¹³ This template given here is the minimum information. The financial institutions may add few more fields where necessary (especially for insurance and capital market intermediaries). Where necessary, reporting entities may add additional fields for additional nominee(s) and/ or where additional guardian information required for the minor account.

¹⁴ Where necessary, the reporting entity may collect physical signature at the later stage and preserve it digitally for further future use.

In step five, after completion of all the processes, system will generate a notification of account opening in process. After completion of necessary sanctions and other screening, account opening confirmation notification should be sent to the customer.

The simplified customer onboarding process will be completed once the client gets notification from the financial institution. However, at any point of relationship, the financial institution may ask for additional information from customer and will preserve it in the digital KYC profile of customer.

In case of joint customer (more than one) onboarding, the similar process required to be followed. All the field mentioned in step- two is the minimum requirement, however, financial institutions especially banks, MFS and non-bank financial institutions may add few fields where necessary. On the other hand, the capital market intermediaries and the insurance companies may add necessary relevant fields as per CDBL requirement and policy proposal form respectively.

3.3.1. Require technology

At a minimum, the customer onboarding via face matching model requires to use the following technology to complete the whole customer onboarding process;

- (a) Software/App/Program compatible to the above process;
- (b) Internet connection;
- (c) Smart phone or desktop computer with high resolution webcam;
- (d) Online connection to the NID verification server¹⁵;
- (e) Electronic signature capturing devices (where necessary) etc.

¹⁵ Means NID database either hold by NID Wing of Election Commission and/or Government established any other Authority for identity verification.

3.3.2 Sanctions and other screening

The full-fledged account procedures will be completed by completion of sanction and other necessary screening which includes as follows:

- (a) UNSCRs screening;
- (b) Adverse media screening (where necessary); and
- (c) Internal or external exit list (where necessary).

3.3.3. Audit trail of customer profile

To maintain an audit trail a financial institution or their nominated third parties are required to preserve a digital KYC profile and relevant logbook, even for low risk or financial inclusion products, which should include the followings:

- (a) Customer details (name, contact, address, etc) with photograph;
- (b) Customer ID image (both side);
- (c) Customer signature (where necessary);
- (d) Customer risk review process (once in 5 years);
- (e) Transaction pattern etc; and
- (f) Others information as deemed necessary to complete customer KYC.

The financial institution should maintain a digital log for all successful and unsuccessful clients onboarding, matching parameters etc. for further use and audit trail. All the technology data should be preserved and stored digitally for further both internal and external audit purposes. The sample e-KYC profile, at a minimum, should be look like as per annex -1.

3.3.4. Matching parameters¹⁶

As the electronic onboarding requires matching customer's ID stored data with the national identification database, the following elements or information required to be matched as per described percentile:

Particulars	Matching Percentage
Applicants' Name	≥ 80%
Date of Birth	100%
Fingerprint	≥ 80%
NID number	100%
Fathers' Name	≥ 80%
Mothers' Name	≥ 80%

3.3.5. Security measures

The financial institution may use additional security measures in the customer onboarding process which may contains checking the phone number by generating PIN codes and other measures as deemed necessary. Additionally, security of the data recorded and preserved under this e-KYC should be maintained properly by the financial institution so that no customer data to be hacked or compromised. This Guideline also suggest to preserved customer data locally hosted server or cloud sever and put in place necessary data protection and data security measures as prescribed by the prudential and self regulators and/or by the government of Bangladesh.

¹⁶ Applicant's name, parent name filled may be left as editable form, however, date of birth, NID number should be kept in un-editable form.

4. Customer onboarding- Regular measure

The financial institutions are encouraged to use electronic onboarding and e-KYC procedures for the products and services which are not fall under proven low risk or limited risks as well. This means electronic onboarding and e-KYC procedures are also applicable for any sorts of financial products.

Both the technology-based model i.e. fingerprints and faces matching technologies are applicable for regular onboarding and managing KYC. Similarly, such onboarding process only applicable for natural person who have valid NID.

Initially onboarding process for the regular e-KYC is similar, however, it requires few modes of additional information and conduct additional customer due diligence compared to the simplified method. The reporting entities are required to create digital customer KYC profile and risk grading exercise digitally during the regular e-KYC. This means similar step by step¹⁷ procedures have to be followed in case of different models (fingerprint and face matching) as discussed above to complete the regular e-KYC procedures.

Therefore, the component of regular e-KYC includes the following elements:

- a) A digital template with more information compared to simplified e-KYC;
- b) A more stringent KYC profile of the customer;
- c) Screening of customer other than UN Sanctions (for example: PEPs/IPs, Beneficial Owner, Adverse Media, Internal External list checking etc.);
and
- d) Risk grading exercise.

¹⁷ All steps mentioned in this Guideline are generic; the financial institution may reorganize this step by step process where necessary.

Along with the process of digital onboarding already discussed above, the digital information template at a minimum required for regular e-KYC would be as follows:

Account Name.....	Account Type.....		
Account Number.....	Unique Account Number.....		
Applicant's Name:			
Mother's Name:			
Father's Name:			
Spouse Name :.....			
Gender (M/F/T).....	Date of Birth.....		
Profession.....	Monthly income.....	Sources of Fund.....	
Mobile Phone Number:.....			
Present Address:	Nationality.....		
Permanent Address:			
Nominee:.....	Date of Birth.....	Relation.....	Photograph.....

NB: a) Incorporate 'add' button of similar field if there is more than one applicant;
b) Incorporate 'add' button of similar field if there is more than one nominee;
c) If applicant is minor then they should proceed for traditional methods of account opening;
d) Incorporate 'add' the following field if nominee is 'Minor'
i) Name of minor nominee... ii) Name of Guardian... iii) Address.... iv) Relation....
v) NID of Guardian..... vi) Photograph of Guardian.....

The customer onboarding process and instructions as discussed above for the simplified measures will be similar for regular e-KYC. After opening account financial institution may collect additional information and customer wet signature to create full digital profile of the client.

4.1. Required technology

The same technologies mentioned in this Guideline for simplified e-KYC also be applicable for regular e-KYC.

4.2. Sanctions and other screening

The screening mechanism for regular e-KYC is quite stringent compare to the simplified one. The full-fledged account procedures will be completed by completion of sanctions and other necessary screening which includes as follows:

- (a) UNSCRs screening;
- (b) PEPs/IPs Screening;
- (c) Identification of beneficial ownership (if any);
- (d) Adverse media screening;
- (e) Risk grading of customer;
- (f) Customer Due Diligence template;
- (g) Enhanced Due Diligence (if needed).

4.3. Audit trail of customer profile

To maintain an audit trail a financial institution or their nominated third parties are required to preserve a digital KYC profile and relevant log book or data which should include the followings:

- (a) Customer details (Name, contact, address, etc) with photograph;
- (b) Customer ID image (both side);
- (c) Customer signature (where necessary);

- (d) Risk grading of customer (where necessary);
- (e) Customer Due Diligence template (where necessary)
- (f) Customer transaction pattern; and
- (g) Others information as deemed necessary to complete customer KYC.

The financial institution should maintain a digital log for all successful and unsuccessful e-KYC onboarding process for further work and audit trail. All the technology data should be preserved and stored digitally for further audit purposes. The sample e-KYC profile, at a minimum, should look like as per 6.2.

4.4. Matching parameters

The similar matching parameters mentioned in the simplified e-KYC will be applicable for regular e-KYC.

4.5. Security measures

The financial institution may use additional security measures in the customer onboarding process which may contains checking the phone number by generating pin codes and other measures as deemed necessary. Additionally, security of the data recorded and preserved under this e-KYC should be maintained properly by the financial institution so that no customer data to be hacked or compromised. This Guideline also suggest to preserved customer data locally hosted server or cloud sever and put in place necessary data protection and data security measures as prescribed by the prudential and self regulators and/or by the government of Bangladesh.

5. Other relevant issues

5.1. Record Keeping

The financial institution should maintain all sorts of digital data and log until five years after the closure of the account or business relationship. The digital data shall contain customer onboarding, customer identity verification, KYC profile, risk grading exercise; transaction related data and their analysis; all sorts of correspondence with customer; data collected later for CDD purposes; and all other relevant files.

Digital footprint and log should contain but not limited to information collected during clients' identity verifications and other relevant information related to the screening measures also required to be preserved. The financial institutions also may collect other complementary data (such as, geo location, IP addresses, etc.) which could also support ongoing due diligence.

5.2. Reliance on third parties

To implement the e-KYC, the financial institution may rely on the third-party technology providers either full or part to implement e-KYC. Though a financial institution may be engaged with third party, the ultimate responsibility still lies with them. This means financial institution may rely on another entity or technology providers that satisfies the criteria described above to conduct customer due diligence which covers (i) customer identification and verification data from independent and reliable sources; (ii) identify and understand who the beneficial owner(s) is; and (iii) identify the purpose and intended nature of business and relevant CDD measures in a digital manner. Yet, the financial institution itself should ensure the reliability and authenticity of the data collected. The following condition may apply while engaging with any third party for the financial Institutions:

- Immediately obtain the necessary information concerning the identity of the customer as mentioned in (i) –(iii) in the above.
- Take adequate steps to satisfy itself that the third party will make available copies of identity evidence or other appropriate forms of access to the data or digital log as mentioned (i) –(iii) in the above and in this Guideline without delay.
- The activities of the third party shall be regulated under this e-KYC Guidance and will be monitored by the financial institutions.
- Third party shall ensure customer and financial institutions’ data protection according to the IT security policy of Bangladesh Government and the respective prudential and self regulators.
- Both the third party and the financial institution covered under this guidance shall ensure the customer data collected under this guidance shall not digitally transmitted or transferred outside Bangladesh without prior approval of the prudential regulators and/or BFIU. In this case, BFIU Circular No. 23 dated 31/01/2019 will be applicable.

5.3 Risk Assessment

The financial institution shall have to conduct a risk assessment of new technology based electronic KYC mechanism to understand how it may be abused and put in place appropriate measures to prevent such abuse as per the circulars and Guidance issued by BFIU. The financial institution also required to conduct customer risk assessment as mentioned in 6.3 of this Guideline.

5.4 Implementation

The financial institutions should implement this regulation by December 2020 as the timeline set out in the National Strategy Paper for preventing ML/TF 2019-2021 published by the Government People's Republic of Bangladesh.

5.5 Transformation of existing clients CDD

The financial institution may transform their existing clients CDD related documents into digital form following above mentioned procedures where applicable.

6. e-KYC Profile- Simplified and Regular

6.1 Sample output of the simplified e-KYC¹⁸

Photo Customer	Photo Others
Applicant's Name:	
Mother's Name:	
Father's Name :.....	
Spouse Name-----	
Date of Birth Gender (M/F/T).....	
Profession.....	
Mobile Phone Number.....	
Present Address:	
Permanent Address:	
Nominee:.....: Relation..... Photograph.....	
Specimen signature/digital signature (where necessary)	
Front side of NID	Back side of NID
1. Has UNSCRs check done? (Yes) (No)	
2. Has review of customer profile done (existing customer)? if so, date of review.....	
3. What is the average range of customer transaction (over 6/12 months)?.....	
4. Any other relevant field may be add here.....	

¹⁸ 'Photo Others' shall include the photograph of nominee(s), beneficial owner(s), joint account holder(s), minor(s) or their guardian(s) as applicable.

6.2. Sample output of regular e-KYC

	Photo Customer		Photo Others
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Applicant's Name:.....

Account number:..... Unique account number.....

Mother's Name:

Father's Name :

Spouse Name:

Date of Birth Gender (M/F/T).....

Profession:..... Monthly income..... Sources of Fund.....

Mobile Phone Number:..... Nationality..... TIN (if any):

Present Address:

Permanent Address:.....

Nominee:.....: Relation..... Photograph.....

Specimen signature.....

Front side of NID	Back side of NID
-------------------	------------------

5. Has UNSCRs check done? (Yes) (No)
6. Has risk grading done? If assessed risk high then conduct EDD as per BFIU circular.

Risk Type	Overall Score
Regular (< 15)	
High (≥15)	

7. Is the customer is IPs/PEPs? If client is PEPs or IPs with higher risk, then conduct EDD as per BFIU circular.
8. Is there any adverse media news against the customer? If any then conduct EDD.
9. Has the source of und verified/justified? (Yes) (No)
10. Has the beneficial ownership checked? If there any beneficial owner found, then conduct CDD on beneficial owner. If beneficial owner is PEPs, then conduct EDD.
11. Are any other documents obtained.....?
12. Nominee details:.....
13. Has review of customer profile done (existing customer)? if so, date of review.....
14. What is the average range and usual pattern of customer transaction (over 6/12 months)?....
15. Any other relevant field may be add here.....

6.3 Form for Customer Risk Grading:

<u>1. Type of On-boarding</u>			
Branch/Relationship Manager		2	
Direct Sales Agent		2	
Walk-in		3	
Internet/Self check-in/Other non Face to Face		5	
<u>2. Geographic Risks:</u>		Score	
Client is--			
Resident Bangladeshi		1	
Non-resident Bangladeshi		2	
Foreign Citizen		3	
For Foreigners:			
Risk classification of country of origin			
Does client's country of citizenship feature in FATF/EU/OFAC/UN Black List/Grey List?			
No		0	
Yes		5	
<u>3. Type of Customer:</u>		Score	
Is client a PEP/Chief or High Official of International Organization, as per BFIU Circular?			
No		0	
Yes		5	
Is client's family/close associates related to PEP/Chief or High Official of International Organization?			
No		0	
Yes		5	
Is client a IP? or his family/close associates related to IP?			
No		1	
Yes (based on assessed risk)		5	
<u>4. Product and Channel Risk:</u>		Score	
Type of Product			
Savings account		1	
Current account		4	
FDR		3	
Deposit Scheme upto 12 lac		1	
Deposit Scheme above 12 lac		3	
Forex account		5	
S.N.D.		3	
R.F.C.D.		5	
<u>5. Business and Activity Risk</u>		Score	
(a) Business			
Please pick Applicable from Annexure and put the relevant score in the next column		
(b) Profession			
Please pick Applicable from Annexure and put the relevant score in the next column		
<u>6. Transactional Risks:</u>		Score	
What is the client's Average Yearly Transactions Worth?			
<BDT 1 million		1	
From BDT 1 million to 5 million		2	
From BDT 5 million to 50 million (5 crores)		3	
More than BDT 50 million (5 crores)		5	
<u>7. Transparency Risk</u>		Score	
Des client has Provided credible source of funds			
No		5	
Yes		1	

Annexure: Select Business or Profession (for 6.3 item no.5)

<i>Client Business</i>	<i>Score</i>	<i>Client Profession</i>	<i>Score</i>
<i>Jeweller/Gold/Valuable Metals Business</i>	5	<i>Pilot/Flight Attendant</i>	5
<i>Money Changer/Courier Service/Mobile Banking Agent</i>	5	<i>Trustee</i>	5
<i>Real Estate Developer/Agent</i>	5	<i>Professional (Journalist, Lawyer, Doctor, Engineer, Chartered Accountant, etc.)</i>	4
<i>Promoter/Contractor: Construction Projects</i>	5	<i>Director (Private/Public Limited Company)</i>	4
<i>Art and Antiquities Dealer</i>	5	<i>High Official of Multinational Company (MNC)</i>	4
<i>Restaurant/Bar/Night Club/Parlour/Hotel</i>	5	<i>Homemaker</i>	4
<i>Export/Import</i>	5	<i>Information Technology (IT) sector employee</i>	4
<i>Manpower export</i>	5	<i>Athlete/Media Celebrity/Producer/Director</i>	4
<i>Firearms</i>	5	<i>Freelance Software Developer</i>	4
<i>RMG/Garments Accessories/Buying House</i>	5	<i>Government service</i>	3
<i>Share/Stocks Investor</i>	5	<i>Landlord/Homeowner</i>	3
<i>Software/Information and Technology Business</i>	5	<i>Private Service: Managerial</i>	3
<i>Travel Agent</i>	4	<i>Teacher (Public/Private/Autonomous Educational Institution)</i>	2
<i>Merchant with over 10 million takas invested in business</i>	4	<i>Private Sector Employee</i>	2
<i>Freight/Shipping/Cargo Agent</i>	4	<i>Self-employed Professional</i>	2
<i>Automobiles business (New or Reconditioned)</i>	4	<i>Student</i>	2
<i>Leather/Leather goods Business</i>	4	<i>Retiree</i>	1
<i>Construction Materials Trader</i>	4	<i>Farmer/Fisherman/Labourer</i>	1
<i>Business Agent</i>	3	<i>Others: (Please State Below and circle numerical score as needed)</i>	
<i>Thread/"Jhut" Merchant</i>	3		<i>1..2..3..4 ..5</i>
<i>Transport Operator</i>	3		
<i>Tobacco and Cigarettes Business</i>	3		
<i>Amusement Park/Entertainment Provider</i>	3		
<i>Motor Parts Trader/Workshop</i>	3		
<i>Small Business (Investment below BDT 5 million)</i>	2		
<i>Computer/Mobile Phone Dealer</i>	2		
<i>Manufacturer (except, weapons)</i>	2		
<i>Others: (Please State Below and circle numerical score as needed)</i>			
	<i>1..2..3.. 4..5</i>		