

GUIDANCE NOTE

# USE OF ELECTRONIC EID&V SOFTWARE BY JERSEY REGULATED BUSINESSES USING VERIFY BY TILLER

APRIL 2023

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# INTRODUCTION

This document is intended as a guide to support Registered Persons who are considering the use of electronic methods of identification and verification in their business.

This template is an accelerator and provides some information and a guide on additional areas required.

This document should not be considered as advice. It is not exhaustive and it is assumed that the reader has knowledge of the Proceeds of Crime Law, Money Laundering Order, the AML/CFT handbook, plus all related legislative and regulatory requirements.

This document focusses on the obligation of the Supervised Person to find out identity and obtain evidence for individuals at the outset of the business relationship, or one-off transaction, only.

## The Money Laundering Order

The Money Laundering Order [Article 15(1)(b)] requires Enhanced CDD to be applied where the customer is not physically present. Therefore, all allowances for lower risk relationships have been looked-past in this document. Similarly, this document assumes that certified documents are not present in an electronic ID&V process.

It should be noted that electronic forms of identification are intended to support the collection of information as part of a wider policy framework. Where it is identified that an E-ID application does not cover particular elements of identification measures (or more general CDD measures) then, in line with Article 13 of the Money Laundering Order,

those elements should continue to be applied using a supervised person's existing systems and controls (including policies and procedures) [AML/CFT Handbook, 4.3.5, 72].

## Registered Persons

A Registered Person should complete their own risk assessment to identify risks involved in the use of the eID&V application then apply appropriate mitigation measured. This document may be used to support that risk assessment but ultimate sign off is the responsibility of the Registered Person. Furthermore, A Registered Person should review and be familiar with their obligations under the JFSC's Policy Statement and Guidance Notes on Outsourcing and related items.

## JFSC Guidance

The latest JFSC guidance notes on eID&V, which includes the use of for the purpose of Identification and Verification, can be found here: [section-4-identification-measures-finding-out-identity-and-obtaining-evidence-handbook-effective-31-may.pdf \(jerseyfsc.org\)](https://www.jerseyfsc.org/section-4-identification-measures-finding-out-identity-and-obtaining-evidence-handbook-effective-31-may.pdf)

## Verify by Tiller

Verify by Tiller is an eID&V solution. This document sets out below information in support of how it meets the requirements of a Registered Person.



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# FINDING OUT IDENTITY

A Supervised Person may demonstrate that it has found out the identity of an individual where it collects all the following [Article 3(2)(a) of the Money Laundering Order]:

No.	Requirement	Meeting the Requirement	Does Verify meet the requirement?
01	<b>Legal Name &amp; names currently used</b>	Names are read from the ID Documents Names are checked vs electoral registers or similar	Yes <sup>1</sup>
02	<b>Former names</b>	Application allows additional names to be captured and for supporting documents to be uploaded	Yes
03	<b>Principle residential Address</b>	Addresses are read from the ID Documents then checked vs various third-party sources such as the electoral register and credit-check headers.	Yes <sup>1</sup>
04	<b>Date of Birth</b>	Date of Birth is read from the ID document then checked to government data sources	Yes
05	<b>Place of Birth</b>	Place of Birth is read from the ID document then checked to government data sources. Manual capture is available where the ID document does not carry this data field.	Yes
06	<b>Nationality</b>	Nationality is read from the ID documents then checked to government data sources. Manual capture is available where the ID document does not carry this data field.	Yes <sup>1</sup>
07	<b>Government Issued Identifier</b>	Identification numbers is read from the ID document then checked to government data sources.	Yes <sup>1</sup>
08	<b>Gender Identity</b>	Gender is read from the ID documents	Yes

## Footnotes

1 Subject to country coverage. Please refer to the appendices

2 Meeting the requirement assumes that the person reviewing the case does so appropriately.

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# OBTAINING EVIDENCE OF IDENTITY

A supervised person may demonstrate that it has obtained two sources of evidence that cover 1,3,4,5,6 & 7 above

No.	Requirement	Meeting the Requirement	Does Verify meet the requirement?
09	<b>A current passport, national identity card or driving licence</b>	<p>Images of the document are captured by the user's mobile device. If an NFC chip is present, items such as the person's details and photograph are extracted from the chip.</p> <p>The images are presented to the user as part of the in-app operations process for approval.</p> <p>The list of support countries and documentation types are in the appendices.</p>	Yes <sup>1</sup>
10	<b>Correspondence from central or local government, bank statement, utility bill or tenancy contract / agreement</b>	<p>Images of such correspondence can be captured by the user's mobile device then uploaded.</p> <p>The images are presented to your business user as part of the Operations Portal approval process.</p>	Yes <sup>2</sup>

## Obtaining Evidence of Identity - Independent Data Sources

The Guidance Notes in the AML/CFT Handbook [section 4.3.4, 66] confirms that a supervised person may demonstrate that it is satisfied that data or information it has accessed directly from data source(s) is sufficiently extensive, reliable and accurate under Article 3(2)(a) of the Money Laundering Order where the source, scope and quality of the data or information accessed are understood.

Verify by Tiller is continually adding new third-party sources. Please refer to [www.tiller-verify.com](http://www.tiller-verify.com) or contact Tiller direct for further information.

### Footnotes

1 Subject to country coverage. Please refer to the appendices

2 Meeting the requirement assumes that the person reviewing the case does so appropriately.

# ADDITIONAL MEASURES FOR WHEN THE PERSON IS NOT PHYSICALLY PRESENT

The Guidance Notes specifically highlights features of E-ID applications that may be used to mitigate the risk that documents have been tampered with or forger may include:

No.	Requirement	Meeting the Requirement	Does Verify meet the requirement?
11	The copy of the document is of a very high level of clarity and resolution	Images are captured by the user's mobile device or extracted from the document's NFC chip. The images are presented to the user as part of the in-app operations process for approval.	Yes <sup>2</sup>
12	The copy of the document is automatically matched to a pre-defined "template" for the given id document	The document image is compared to government templates as part of the ID&V process	Yes <sup>1</sup>
13	The data in the main body of the document is compared to biometric data stored in the document's machine-readable zone code	Where the document type supports this capability (for example, passport document with NFC/RFID chips), this check is undertaken	Yes <sup>1</sup>
14	Data on the document is automatically examined for use of unauthorised print fonts and unexpected character spacing	The ID document image is compared to government templates as part of the ID&V process	Yes <sup>1</sup>
15	The copy of the document is automatically examined to enable detection of fraudulent documents on the basis of that documents' security features and locations of its elements	The ID document image is compared to government templates as part of the ID&V process.	Yes <sup>1</sup>
16	The copy of the document is examined by individuals specifically training to detect tampering / forgery (e.g. ex-border agents) or the E-ID application has been designed with the characteristics of this training/expertise in mind.	The ID document image is compared to government templates as part of the ID&V process. Verify by Tiller has been built with this requirement in mind and incorporates a range of tamper-detection processes.	Yes <sup>1</sup>
17	The E-ID application itself controls the process and allows no opportunity to tamper with documents or photographs	Verify by Tiller controls the entire process. The user has no opportunity to tamper with images	Yes

## Footnotes

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# ADDITIONAL MEASURES FOR WHEN THE PERSON IS NOT PHYSICALLY PRESENT

Continued

No.	Requirement	Meeting the Requirement	Does Verify meet the requirement?
18	A highly secure connection is used to transmit copies of documents and photographs	The transmission method is highly secure and undertaken by the application	Yes
19	The E-ID application's security is regularly tested in order to guard against hacking or other security breaches	Verify by Tiller undergoes regular, full, front-to-back penetration test cycles. These tests are performed by an independent third party.	Yes
20	A "selfie" photograph of the customer is taken and biometrically compared/matched to the photograph on the identity document presented	A series of randomised, liveness tests are performed during the ID&V process. These are checked to the government issued ID document.	Yes
21	A video or a "micro-stream" of photographs is taken in order to identify facial movements, which may help to confirm that the customer is present	A series of randomised, liveness tests are performed during the ID&V process. These are checked to the government issued ID document.	Yes
22	Use of anti-impersonation measures	A series of randomised, liveness tests are performed during the ID&V process. These are checked to the government issued ID document.	Yes
23	A code or password is sent to the customer who, immediately before the application	The user is provided with a unique activation link as part of the ID&V process.	Yes
24	Use of location matching	GPS location is captured as part of the ID&V process	Yes
25	The requirement that any image taken is adequately illuminated when using the E-ID solution	Images are captured by the user's mobile device or extracted from the document's NFC chip. The images are presented to the user as part of the in-app operations process for approval.	Yes <sup>2</sup>
26	Where a supervised person uses E-ID applications, adequate records are required to be kept	A full report of the ID&V checks & findings are provided to the Supervised Person on completion of the ID&V process.	Yes <sup>2</sup>

## Footnotes

1 Subject to country coverage. Please refer to the appendices

2 Meeting the requirement assumes that the person reviewing the case does so appropriately.

# RECORD KEEPING REQUIREMENTS RELEVANT TO THE USE OF E-ID

No.	Requirement	Meeting the Requirement	Does Verify meet the requirement?
27	Adequate records are required to be kept	Verify by Tiller provides the Supervised Person with a pdf containing a full copy of all data, images and findings conducted as part of the ID&V process. The Supervised Person is subsequently responsible for maintaining these records on an ongoing basis.	Yes <sup>2</sup>
28	Details of the biometric checking undertaken	This varies by country and document type. Please refer to Verify by Tiller's service documents	Yes <sup>1</sup>
29	Details of what third party data sources have been utilised to verify the customer (if any).	This varies by country and document type. Please refer to Verify by Tiller's service documents	Yes <sup>1</sup>
30	Details of the audit trail, sign-off or additional steps which have been undertaken.	Verify provides a comprehensive .pdf document the details all the steps and approvals undertaken whilst using the service.	Yes <sup>1, 2</sup>
27	Adequate records are required to be kept	Verify by Tiller provides the Supervised Person with a pdf containing a full copy of all data, images and findings conducted as part of the ID&V process. The Supervised Person is subsequently responsible for maintaining these records on an ongoing basis.	Yes <sup>2</sup>
28	Details of the biometric checking undertaken	This varies by country and document type. Please refer to Verify by Tiller's service documents	Yes <sup>1</sup>
29	Details of what third party data sources have been utilised to verify the customer (if any).	This varies by country and document type. Please refer to Verify by Tiller's service documents	Yes <sup>1</sup>
30	Details of the audit trail, sign-off or additional steps which have been undertaken.	Verify provides a comprehensive .pdf document the details all the steps and approvals undertaken whilst using the service.	Yes <sup>1, 2</sup>

## Footnotes

1 Subject to country coverage. Please refer to the appendices

2 Meeting the requirement assumes that the person reviewing the case does so appropriately.

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# APPENDIX: FAQs

## Supporting Documentation

- ▶ **What forms of Identification are supported by Tiller?**

All major identity document of supported countries can be used. Please refer to [www.tiller-verify.com](http://www.tiller-verify.com) or contact Tiller direct.

- ▶ **What countries are supported by Tiller?**

Please refer to [www.tiller-verify.com](http://www.tiller-verify.com) or contact Tiller direct.

- ▶ **What Third-party data sources are supported by Tiller?**

Please refer to [www.tiller-verify.com](http://www.tiller-verify.com) or contact Tiller direct.

## Data collection and sharing

- ▶ **What data is provided by the client firm to Tiller?**

Please see the Tiller Service Information document [here](#). Tiller requires some minimal information from the client firm for its own due diligence and to provide to 3rd party service providers where necessary.

- ▶ **What data is collected from the end user?**

Please see Tiller's Service Information document. Tiller captures minimal information as possible to perform their checks.

- ▶ **What data is stored on the user device and/or uploaded to the Tiller servers?**

No data is stored on the end user's device. All data will be stored in our cloud-based services hosted by Microsoft Azure. Please see the attached Service Information document for more information on data storage.

All customer records and associated data is stored for a maximum of 8 weeks before it is auto-deleted from the servers. Clients can manually delete data at any time, in which case the data is kept in a safe-recover state for two weeks before deletion.

- ▶ **What data is shared with the client firm?**

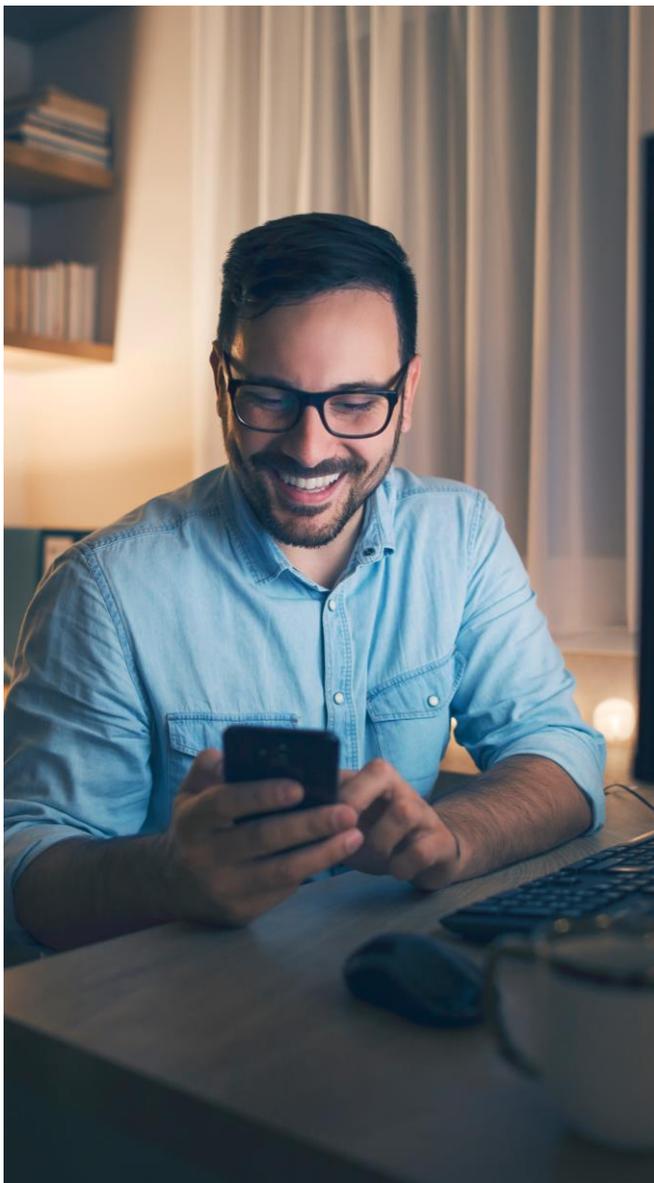
When the checks have been completed a PDF will be generated for each customer to store in their records. This includes the data captured to perform the checks and check results.

- ▶ **What data is shared with other third parties?**

Tiller shares the end user information with 3rd party service providers to be able to perform the checks. Tiller has agreements in place with all providers. Service providers need to accept a Terms of Use and each end user needs to accept an End User Licence Agreement to use the Verify by Tiller services.

- ▶ **Where is data hosted?**

Data is hosted on Microsoft Azure Datacentre in Dublin (Ireland) and a secondary geo-redundant datacentre in Amsterdam (Holland). Please refer to Tiller's Service Information document.



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# APPENDIX: FAQs

## Security

- ▶ **What security testing has been performed on the app and Tiller infrastructure?**

During its development, security is being tested by Tiller's in-house Quality Assurance developers. Once the application has been deployed to a production server, Tiller complete a full front-to-back penetration test to be conducted by independent security providers. Any security issue found is addressed and retested.

- ▶ **How often is the security of the tool tested and will the outcome of those tests be shared with us as customers on a periodically agreed basis?**

Although in house testing will be conducted regularly. Tiller will conduct an external security review at least every 12 months. Tiller do not intend to make these commonly available to customers unless an incident needs reporting.

- ▶ **What is the security of the connection used to transmit the documentation/photographs sent by the individual using the app?**

Please review Tiller's Service Information document for details on in transit data encryption.

## Contracting

- ▶ **What is the contract and terms and conditions?**

The commercial model is to offer a Pay-As-You-Go pricing, such that there is no requirement for an ongoing contract. Clients are billed at the end of each month for customer checks performed.

Please refer to Tiller's Terms of Use.

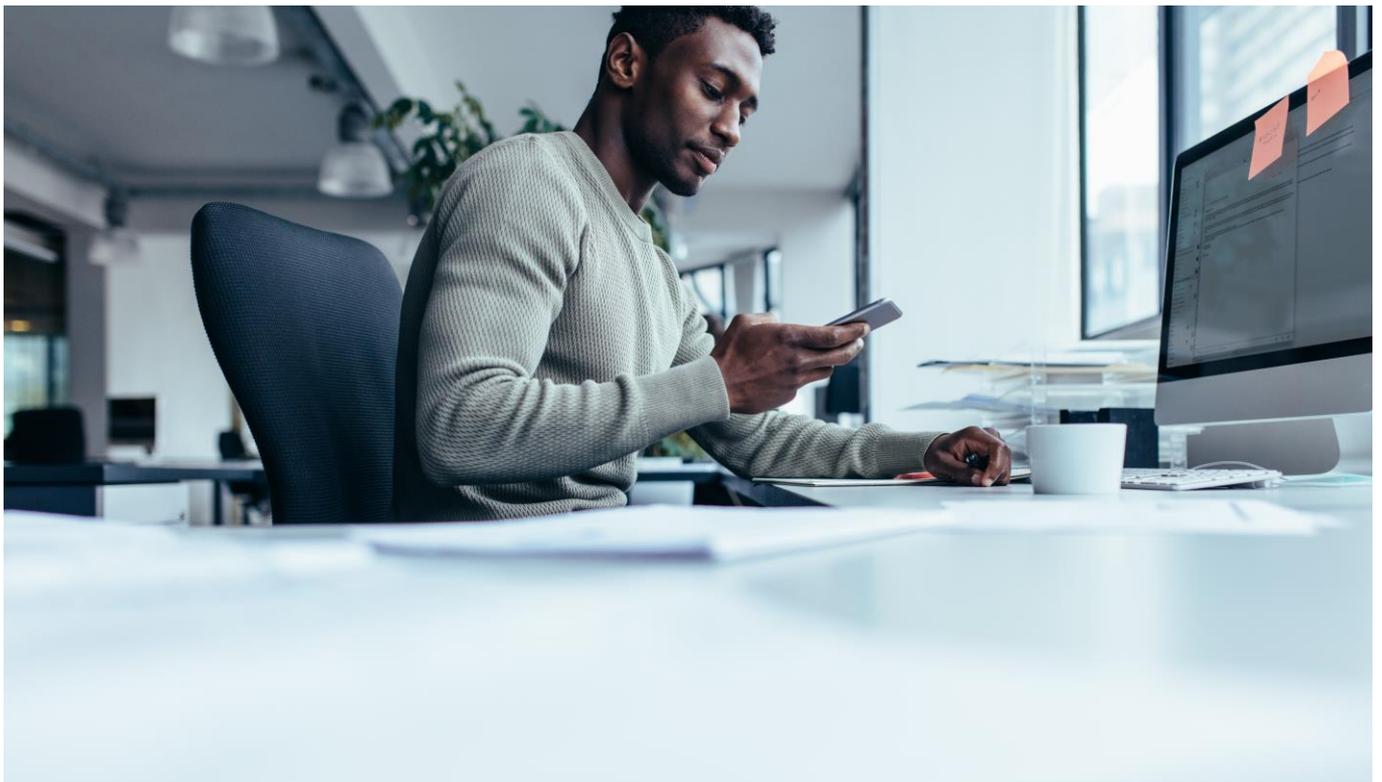
## Data Privacy

- ▶ **What is the app's privacy statement? -**

Tiller has a general Privacy Policy on its website. <https://www.tiller-verify.com/verify-privacy-policy>

- ▶ **Is Tiller a Data Controller or our Data Processor?**

For Verify by Tiller, where Tiller provide a technology service on behalf of the Client Company, Tiller is a Data Processor.





FOR MORE INFORMATION:

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