



# Digital ID Assessment Instrument

## FINANCIAL SECTOR MODULE





This assessment instrument is used to analyze the usage and penetration of ID in the Financial Sector and supplements the ID Enabling Environment assessment (IDEEA) by the WBG ID4D team

## Objective of the Questionnaire

This instrument aims to collect comparable data on the Customer Due Diligence (CDD) practices and identification documents used by the financial service providers.

CDD as specified in FATF Recommendation 10 is based on four pillars, requiring: 1) identification and verification of customers, 2) identification and verification of beneficial owners, 3) understanding the nature and purpose of transactions, 4) monitoring the clients and their transactions on an ongoing basis. The adequate identification of a customer so as to allow access to, and use of, financial services is an integral part of that customer's engagement with the financial sector and, one of the key facets of CDD. These requirements for account opening are typically specified in the legal or regulatory framework of a particular jurisdiction and often vary across jurisdictions.

This assessment instrument seeks to instigate jurisdictions to consider the requirements for CDD in the financial sector, collate valuable country-level data on consumer identification, compliance requirements and practices that pertain to the financial sector, and support the ability for financial sector authorities to be able to benchmark identification requirements against peer economies.”

### INSTRUCTIONS

Responsibility for this effort should be delegated to the relevant lead/department within your institution. Given the range of topics covered in this module, we understand that it may be necessary to consult and coordinate with other government agencies but require that your institution serve as the primary respondent.

If the same requirement applies to all the institutional categories in the question, kindly use the separate column provided to indicate that the requirement applies equally to all listed institutional categories.

Please provide responses in the space given, feel free to use different font or font color to distinguish responses from questions.

We would be happy to answer any questions you may have and provide guidance to the official you designate to coordinate responses to the module. You may also request a translated or Word version of the questionnaire. Please contact [fmontes@worldbank.org](mailto:fmontes@worldbank.org) with any questions or requests for clarifications.



## Acknowledgments

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## Acronyms

AML	Anti-Money Laundering
API	Application Programming Interface
CDD	Customer Due Diligence
CFT	Combating the Financing of Terrorism
CTF	Combating Terrorist Financing; an alternative acronym to CFT
DFS	Digital Financial Services
FATF	Financial Action Task Force
FSP	Financial Service Provider
KYC	Know Your Customer
LEI	Legal Entity Identifier
LoU	Local Operating Unit
MFI	Microfinance Institution
NBEI	Non-bank E-money Issuer
ODTI	Other Deposit Taking Institution
OTP	One-Time Password
PEP	Politically Exposed Person
PIN	Personal Identification Number
PoC	People's of Concern
SDD	Simplified Due Diligence
UNHCR	United Nations High Commissioner for Refugees

## A. BACKGROUND INFORMATION

Please provide the following information on the agency responding (or coordinating responses) to this Survey

### A.1 Name of the agency:

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### A.2 Person filling out the Survey *(please include as many respondents as units involved in the response)*

1	Name:	
2	Position/title:	
3	Respondents' Unit	
4	Email:	

1	Name:	
2	Position/title:	
3	Respondents' Unit	
4	Email:	

1	Name:	
2	Position/title:	
3	Respondents' Unit	
4	Email:	

## B. FINANCIAL SECTOR LANDSCAPE

To facilitate international comparison, the Survey groups financial institutions into fifteen (15) broad categories. In the table below, we ask you to classify institutions existing in your country into these fifteen (15) groups. We ask you to list the types of institutions that are supervised/regulated in your country and to place them into the appropriate category. Where there is some ambiguity as to which category an institution belongs, please use your best judgment to pick one category. To assist you with filling out this table, we provide examples of institution types that fall into certain categories.

### B.1 For each category, provide the type of the institutions that are supervised/regulated in your country.

This classification will structure your responses throughout the survey and you will need to ensure your responses to the following questions should reflect the classification provided here

INSTITUTIONAL CATEGORY	DEFINITIONS	For each category, provide the type of the institutions that are supervised/regulated in your country.
<b>Commercial Banks</b>	A commercial bank is an institution licensed for taking deposits from the general public and subject to supervision in the meaning of the <a href="#">Basel Core Principles for Effective Banking Supervision</a> . A commercial bank is a bank that is (a) not subject by law or regulation to (i) a specified maximum size of loan or savings product or (ii) any limitation on type of client that may be served; and (b) not tasked by law or regulation with serving any particular industry [e.g., <i>Commercial Banks, Universal Banks</i> ].	
<b>Non-Commercial Banks</b>	A bank other than a commercial bank. In a given country this term may include rural banks, agricultural banks, postal banks, among other types of non-commercial banks. (It does not include cooperative banks or mutual banks, which are categorized as financial cooperatives for the purposes of this Survey.) [e.g., <i>Government Agricultural Development Bank</i> ]	
<b>Financial Cooperatives</b>	A member-owned and member-controlled financial institution governed by the “one member one vote” rule. Financial cooperatives often take deposits or similar repayable funds from, and make loans only to, members, although some also serve non-members. The term includes credit unions, caisses, cajas, cooperative banks, and savings and credit cooperatives [e.g., <i>Credit Unions</i> ].	
<b>Other Deposit Taking Institutions (ODTIs)</b>	An institution authorized to collect deposits or savings that does not fit the definition of commercial bank or financial cooperative. ODTIs include deposit-taking microfinance institutions, savings and loan associations, among other non-bank deposit-taking institutions. [e.g., <i>Municipal Savings and Loan Institutions</i> ]	
<b>Microfinance Institutions (MFIs)</b>	A financial institution that provides microcredit targeting low-income and poor customers and does not collect deposits or savings [e.g. <i>Institutions that provide group lending or individual lending on small amounts and short term</i> ].	

continued

B.1, continued

INSTITUTIONAL CATEGORY	DEFINITIONS	For each category, provide the type of the institutions that are supervised/regulated in your country.
Non-bank E-money Issuer (NBEIs)	An issuer of e-money that is not a bank. The relevant questions in the Survey request respondents to indicate whether the non-bank entity is authorized to act as an issuer of e-money. This doesn't include mobile money [e.g., Government issued touch n Go card for transport].	
Bank-based mobile Money	Includes banks that are licensed or permitted by the regulator to provide mobile based financial transactions that can occur using mobile networks [e.g., Mobile phone based money transfer, deposit and/or financing service] .	
Nonbank-based mobile money	Nonbank financial service provider that is licensed or permitted by the regulator to provide mobile based financial services.  <i>Note:</i> If the regulatory framework for nonbank-based mobile money is the same as NBEIs, there is no need for separate responses for the remaining sections of the Survey.	
Insurance Providers	A financial institution that pools risk by collecting premiums from a large group of people who want to protect themselves and/or their loved ones against a particular loss, such as a fire, car accident, illness, lawsuit, disability or death. This will also include insurance intermediaries (e.g., insurance agents, insurance brokerages)	
Money Transfer Companies	Business entity that provides money transfer services or payment instruments (does not include if transfer is sent via mobile money) [e.g., Moneygram, Western Union].	
Payment System Provider	An entity providing services that enable funds to be deposited into an account and withdrawn from an account; payment transactions (transfer of funds between, into, or from accounts); issuance and/or acquisition of payment instruments that enable the user to transfer funds; and money remittances and other services central to the transfer of money [e.g., credit card, debit card, Paypal, etc.]	
Broker Dealers	A financial intermediary between buyers and sellers to facilitate securities transactions.	
Exchange Companies	A non-bank foreign <b>exchange company</b> also known as foreign <b>exchange</b> broker or simply forex broker is a <b>company</b> that offers currency <b>exchange</b> and international payments to private individuals and <b>companies</b> .	
Cryptocurrency Exchange (if any and only include if regulated)	Any entity that allows customers to trade cryptocurrencies or digital currencies for other assets (fiat money or other digital currencies).	
Postal Operators	Any public or private entity providing various types of postal services, including mailing, delivery and financial services.	

**B.2 Please provide the total number of institutions under each category, as of January 2020.  
Please write N/A if not applicable to your country.**

TYPE OF INSTITUTIONS	TOTAL NUMBER OF INSTITUTIONS
Commercial Banks	
Other Banks	
Financial Cooperatives	
Other Deposit Taking Institutions (ODTIs)	
Microfinance Institutions (MFIs)	
Non-bank E-money Issuer (NBEIs)	
Bank-based Mobile Money	
Nonbank-based Mobile Money	
Insurance Providers	
Money Transfer Companies	
Payment System Providers	
Broker Dealers	
Exchange Companies	
Cryptocurrency Exchange (if any and only include if regulated)	
Postal Operators	

## C. LEGAL, REGULATORY AND SUPERVISORY APPROACHES TO CUSTOMER IDENTIFICATION FOR FINANCIAL SERVICES

C.1 Please specify what authorities (if any) are in charge of: i) issuing the following types of regulation for financial institutions, and ii) supervising or monitoring compliance with such regulation. Please include name of the agency e.g. Central Bank, Data Protection Commissioner, Banking Supervisory authority etc

		COMMERCIAL BANKS		NON-COMMERCIAL BANKS		FINANCIAL COOPERATIVES	
		Issues regulation/ by laws	Supervises	Issues regulation/ by laws	Supervises	Issues regulation/ by laws	Supervises
1	Financial integrity (AML/CFT)						
2	Payment Systems						
3	Provision of Credit/ overindebtedness						
4	Data protection and privacy						
5	Cyber security						

		ODTIs		MFIs		NBEIs	
		Issues regulation/ by laws	Supervises	Issues regulation/ by laws	Supervises	Issues regulation/ by laws	Supervises
1	Financial integrity (AML/CFT)						
2	Payment Systems						
3	Provision of Credit/ overindebtedness						
4	Data protection and privacy						
5	Cyber security						

*continued*

C.1, continued

		BANK BASED MOBILE MONEY		NONBANK BASED MOBILE MONEY		INSURANCE PROVIDERS		MONEY TRANSFER COMPANIES	
		Issues regulation/ by laws	Supervises						
1	Financial integrity (AML/CFT)								
2	Payment Systems								
3	Provision of Credit/ overindebtedness								
4	Data protection and privacy								
5	Cyber security								

		PAYMENT SYSTEM PROVIDERS		BROKER DEALERS		EXCHANGE COMPANIES		VIRTUAL CURRENCY	
		Issues regulation/ by laws	Supervises						
1	Financial integrity (AML/CFT)								
2	Payment Systems								
3	Provision of Credit/ overindebtedness								
4	Data protection and privacy								
5	Cyber security								

		POSTAL OPERATORS	
		Issues regulation/ by laws	Supervises
1	Financial integrity (AML/CFT)		
2	Payment Systems		
3	Provision of Credit/ overindebtedness		
4	Data protection and privacy		
5	Cyber security		

**C.2 Are the documents, records or digital credentials that can be used for identification and/or verification of individuals for financial transactions, explicitly specified in your regulatory framework?**

		Documents for Identification specified in the regulatory framework	If Yes Indicate the name of the regulation and link if available
1	Yes		
2	No		

**C.3 Does your country adhere to any international or regional guidelines related to identification and/or verification of individuals for financial transactions (e.g. FATF Style Regional Bodies)?**

		If Yes, please describe the rule and include link if available
Yes		
No		

**C.4 If C2=No, on what basis do reporting institutions determine documents, records or digital credentials to be collected for identification and/or verification of individuals for financial transactions?**

**C.5 If C2=Yes, at which regulatory level has it been specified?**

Documents to establish identity proof		Please specify:	
		LEGAL ENTITIES	INDIVIDUALS
1	By Law		
2	By regulation		
3	By Directive/Circular or similar administrative documents		

**C.6 Does your country have a threshold for the following:**

	Please specify amount and the types of entities covered	
International wire transfers (refer to <a href="#">FATF Recommendation 16</a> )		
Other occasional transactions (refer to <a href="#">FATF Recommendation 10</a> )		

**C.7 According to your current regulatory framework, which of the following information must be submitted for an individual for the transactions described in the columns below: Please mark all that apply**

		Checking/ savings Account opening	Opening a mobile money account	Credit Card/ Loan	Domestic wire transfers	International wire transfers below threshold (refer to C6)	International wire transfers above threshold (refer to C6)	Exchange transaction below threshold (refer to C6)	Exchange transaction above threshold (refer to C6)
		YES/NO	YES/NO	YES/NO	YES/NO	YES/NO	YES/NO	YES/NO	YES/NO
		Select one: Declaration based/Proof required	Select one: Declaration based/Proof required	Select one: Declaration based/Proof required	Select one: Declaration based/Proof required				
1	Name								
2	Date of birth								
3	Place of birth								
4	Details of immediate related parties (e.g., parents, spouse, children)								
5	Nationality and/or Legal Status								
6	Biometrics								
7	Current address								
8	Home state address								
9	Employment								
10	Income								
11	Tax ID								
12	National ID number or similar issued by central government authority								
13	National ID number or similar issued by local government authority								
14	PEP (self-declaration)								
15	Mobile number linked to the account.								
16	Other, please explain:								

**C.8 Are there any additional requirements if an applicant is (a) female, (b) a minor?**

		FEMALE	IF YES DESCRIBE	MINOR	IF YES DESCRIBE
1	Yes				
2	No				

**C.9 If yes, please describe:**

INFORMATION REQUIRED		FEMALE	MINOR
		YES/NO	YES/NO
1	Marriage certificate		
2	Birth certificate		
3	Standard documentation for financial transactions as above, required for father of applicant		
4	Standard documentation for financial transactions as above required for mother of applicant		
5	Standard documentation for financial transactions as above required for husband of applicant		

**C.10 Which of the following documents, records and digital credentials are accepted as proof information required for various financial transactions as indicated in question C7, according to the current regulatory framework to conduct customer due diligence? Please provide percentage of the population has access/covered by each ID type? Please also indicate strength of anti-fraud features for each ID type on a scale of strong/medium/low. If the *Please mark all that apply.***

		ACCEPT AS PROOF OF ID			What percentage of the population is covered by this type of ID and please provide data source?	Strength of anti-fraud features of the ID type
		Individuals Yes/No/Allowed only in case of low risk	People's of Concern (PoC) Yes/No/Allowed only in case of low risk	Legal Entities Yes/No/Allowed only in case of low risk		
1	National ID					
2	Voter ID					
3	Passport					
4	Driver's license					
5	Tax ID					
6	ID issued to receive government transfers/ subsidies (e.g., social welfare or assistance card)					
7	ID issued specifically for the financial sector (e.g., PAN Card, BankID, Bank Verification Number (BVN))					
8	ID issued by functional ID registries (e.g., UNHCR registry)					
9	Birth certificate					
10	Residence permit					
11	Photo ID issued by educational institution					
12	Employee ID issued by public sector					
13	Employee ID issued by private sector					

*continued*

C.10, continued

		ACCEPT AS PROOF OF ID			What percentage of the population is covered by this type of ID and please provide data source?	Strength of anti-fraud features of the ID type
		Individuals Yes/No/Allowed only in case of low risk	People's of Concern (PoC) Yes/No/Allowed only in case of low risk	Legal Entities Yes/No/Allowed only in case of low risk		Strong/ Medium/Low
14	Letter from local authority					
15	Confirmation letter from a suitable referee as determined by the state					
16	Verified mobile enabled ID credentials (e.g., SIM Card)					
17	Other photo ID, please specify:					
18	Other ID, please specify:					

C.11 Are there simplifications or exemptions to the documentation requirements for certain types of individuals (e.g., low income) or financial products/services (e.g., small-value, low-risk transactions or basic accounts)?

		Applies equally to all institutional categories and does not vary by institutional category (if this applies, no need to fill the other columns)	COMMERCIAL BANKS	OTHER BANKS	FINANCIAL COOPERATIVES	ODTIs	MFIs	NBEIs	MOBILE MONEY	INSURANCE PROVIDERS	MONEY TRANSFER COMPANIES (e.g., Moneygram, Western Union)	PAYMENT SYSTEM PROVIDERS	BROKER DEALERS	EXCHANGE COMPANIES	VIRTUAL CURRENCY	POSTAL OPERATORS
			1	Yes												
1.1	If yes, please specify															
2	No															
3	NA															

**C.12 Does your country have a tiered CDD framework?**

1	Yes
2	No

**C.13 If C12 = Yes, what are the different tiers and the CDD requirements for each tier? Please indicate the tiers that are part of a Simplified CDD**

LABEL OF THE TIER	THRESHOLD OF THE TIER	CDD REQUIREMENTS FOR THE TIER	PRODUCTS AND SERVICES OFFERED IN EACH TIER

**C.14 If you have a tiered approach, please indicate on what basis the tiers are determined,**

	BY WHICH AGENCY	PLEASE EXPLAIN METHODOLOGY
Based on qualitative analysis		
Based on quantitative analysis		
Based on both qualitative and quantitative analysis		

**C.15 Does the regulatory framework in your country allow for any other type of simplification to CDD that is not based on the tiered approach described above?**

SDD APPLIES?	IF YES INDICATE THE TYPES OF INSTITUTIONS	IF YES INDICATE THE REGULATORY FRAMEWORK
Yes		
No		

**C.16 Which of the following institutional categories have access to data from the national ID system in your country?**

		Applies equally to all institutional categories and does not vary by institutional category (if this applies, no need to fill the other columns)	COMMERCIAL BANKS	OTHER BANKS	FINANCIAL COOPERATIVES	ODTIs	MFIs	NBEIs	MOBILE MONEY	INSURANCE PROVIDERS	MONEY TRANSFER COMPANIES (e.g., Moneygram, Western Union)	PAYMENT SYSTEM PROVIDERS	BROKER DEALERS	EXCHANGE COMPANIES	VIRTUAL CURRENCY	POSTAL OPERATORS	
1	Yes																
2	No																
3	NA																

**C.17 According to current regulatory framework, after establishing a business relationship with a financial service provider, which of the following must be submitted for authentication of identity for an individual customer to carry out financial transactions through their account at the following? Please mark all that apply**

		COMMERCIAL BANKS		NBEIs		MOBILE MONEY		MONEY TRANSFER COMPANIES		EXCHANGE COMPANIES		POSTAL OPERATORS	
		YES/NO/NA		YES/NO/NA		YES/NO/NA		YES/NO/NA		YES/NO/NA		YES/NO/NA	
		Online	Physical	Online	Physical	Online	Physical	Online	Physical	Online	Physical	Online	Physical
1	National ID card												
2	Other government recognized ID card												
3	Other ID card												
4	Business ID												
5	Number on the ID card												
6	Fingerprint												
7	Iris scan												
8	Other biometric information												
9	PIN												
10	Personal details												
11	Password												
12	OTP												
13	Token												
14	Digital signature												
15	Security questions												
16	Other, specify:												

## D. IDENTIFICATION FOR LEGAL ENTITIES

**D.1 Does your country require a unique ID for all registered businesses?**

1	Yes
2	No

**D.2 Which agency provides the unique ID number for all registered businesses?**

		YES/NO	If yes, please provide name of the agency:	If yes, please provide type of the unique ID (e.g., tax ID number, company registration number, etc.)
1	Government agency			
2	Private agency			
3	LEI LoU			
4	Other			

**D.3 According to your current regulatory framework, which of the following information must be submitted for legal entities for the transactions described in the columns below: *Please mark all that apply***

		Account opening	Opening a mobile money account	Credit Card/ Loan	Domestic wire transfers	International wire transfers below threshold (refer to C6)	International wire transfers above threshold (refer to C6)	Exchange transaction below threshold (refer to C6)	Exchange transaction above threshold (refer to C6)
		YES/NO	YES/NO	YES/NO	YES/NO	YES/NO	YES/NO	YES/NO	YES/NO
		Select one: Declaration based/Proof required	Select one: Declaration based/Proof required	Select one: Declaration based/Proof required	Select one: Declaration based/Proof required				
1	Name								
2	Date of creation of the legal entity								
3	Place of creation								
4	Name of shareholders								
5	Type of Legal entity								
6	Location								
7	Current address								
8	Home state address								
9	Business description								
10	Billing Information								
11	Tax ID								
12	Companies Registry ID number								
13	Other, please explain:								

**D.4 According to current regulatory framework, after establishing a business relationship with a financial service provider, which of the following must be submitted for authentication of identity for a legal entity customer to carry out financial transactions through their account at the following? Please mark all that apply**

		COMMERCIAL BANKS		NBEIs		MOBILE MONEY		MONEY TRANSFER COMPANIES		EXCHANGE COMPANIES		POSTAL OPERATORS	
		YES/NO/NA		YES/NO/NA		YES/NO/NA		YES/NO/NA		YES/NO/NA		YES/NO/NA	
		Online	Physical	Online	Physical	Online	Physical	Online	Physical	Online	Physical	Online	Physical
1	National ID card												
2	Other government recognized ID card												
3	Other ID card												
4	Business ID												
5	Number on the ID card												
6	Fingerprint												
7	Iris scan												
8	Other biometric information												
9	PIN												
10	Personal details												
11	Password												
12	OTP												
13	Token												
14	Digital signature												
15	Security questions												
16	Other, specify:												

## E. NON-COMPLIANCE

**E.1 What are the sanctions for financial service providers who fail to comply with the identification requirements laid out by law or regulation?**

		<b>YES/NO</b>	<b>If yes, please specify</b> (e.g., max amount of fine, max amount of time/term)	<b>Number of times sanction has been applied from 2012-2017</b>
1	Administrative fine			
2	Criminal fine			
3	Suspension of license			
4	Revocation of license			
5	Imprisonment			

## F. ELECTRONIC PAYMENTS

**F.1 Please indicate whether submission of the following information is mandated by law/regulation or simply practiced to authenticate customer identity when an electronic payment is made at a *physical merchant*? Please mark all that apply**

		CREDIT CARD		DEBIT CARD		MOBILE WALLET
		Mandated = 1 Common Practice (not mandated) = 2 No = 3		Mandated = 1 Common Practice (not mandated) = 2 No = 3		Mandated = 1 Common Practice (not mandated) = 2 No = 3
		Chip	Non-chip	Chip	Non-chip	
1	PIN					
2	Signature					
3	National ID card or similar issued by central government authority					
4	ID card or similar issued by local government authority					
5	Other non-government ID card					
6	Fingerprint					
7	Iris scan					
8	Photo selfie for face recognition					
9	Other biometric information					
10	Mobile number					
11	Address zip code					
12	One-time password/passcode					
13	Other, specify:					

**F.2 Please indicate whether submission of the following information is mandated by law/regulation or simply practiced to authenticate customer identity when an electronic payment is made at an *online merchant*? Please mark all that apply**

		CREDIT CARD		DEBIT CARD		MOBILE WALLET
		Mandated = 1 Common Practice (not mandated) = 2 No = 3		Mandated = 1 Common Practice (not mandated) = 2 No = 3		Mandated = 1 Common Practice (not mandated) = 2 No = 3
		Chip	Non-chip	Chip	Non-chip	
1	Card number					
2	Card verification number					
3	Number on ID card					
4	Photo selfie for face recognition					
5	Mobile number					
6	Address zip code					
7	One-time password/passcode					
8	Other, specify:					
9	Other biometric information					
10	Mobile number					
11	Address zip code					
12	One-time password/passcode					
13	Other, specify:					

**F.3 Are there simplifications or exemptions to the information required to authenticate customer identity for electronic payments below a certain transaction value?**

1	Yes
2	No

If **YES**, go to **F.4**

If **NO**, go to **SECTION G**

**F.4 Please describe the simplifications or exemptions to information requirements when electronic payments are below a certain transaction value.**

## G. VERIFICATION PROCESS FOR FINANCIAL SERVICES

### G.1 What are some of the reference systems to which financial service providers have access to, for verification purposes?

		Applies equally to all institutional categories and does not vary by institutional category (if this applies, no need to fill the other columns)	COMMERCIAL BANKS	OTHER BANKS	FINANCIAL COOPERATIVES	ODTIs	MFIs	NBEIs	BANK BASED MOBILE MONEY	NONBANK BASED MOBILE MONEY	INSURANCE PROVIDERS	MONEY TRANSFER COMPANIES	PAYMENT SYSTEM PROVIDERS	BROKER DEALERS	EXCHANGE COMPANIES	VIRTUAL CURRENCY	POSTAL OPERATORS
1	National ID system																
2	Credit reporting system																
3	Tax system																
4	Business registry																
5	Civil/population registry																
6	Voter registry																
7	Social security system																
8	Pension system																
9	Healthcare system																
10	Judicial system																
11	Officially recognized private ID systems																
12	Internal migration registry																
13	Refugee/stateless registries																
14	Other, please describe:																

**G.2 How can financial service providers access the data held by the reference systems indicated above?**

	YES/NO/NA	Access has a cost for the financial institution?
1 Website		
2 Hardwired links		
3 APIs		
4 Other, please specify:		

**G.3 What is the basic verification requirement according to the regulatory framework in your country for individuals?**

*Please mark all that apply.*

	YES/NO/NA
1 Based on a primary ID document	
2 Asking for secondary ID document(s)	
3 Online verification of ID information against public database (please specify)	
4 Online verification of ID information against private database (please specify)	
5 Off-line verification of ID information through offline card-reader terminals	
6 Reference from a trusted third-party (please specify)	

**G.4 Is there a fee for financial service providers to access data stored by the agency maintaining the ID system?**

1 Yes
2 No

**G.5 If there is a cost, please provide information on when financial service providers have to pay a fee and the fee amount?**

*Please provide fee information in local currency*

	YES/NO	If yes, please specify amount
1 Periodic payments		
2 One-time payment		
3 Per-enquiry		

## H. DATA STORAGE

H.1 Please describe the document retention process that financial service providers undertake, after the verification process

	TYPE OF INFORMATION RECORDED	Time period to delete data (e.g. Only for as long the business relationship exists) Less than five years AFTER the business relationship has ended More than five years AFTER the business relationship has ended)
1	Scan verification information and maintain electronically	
2	Keep electronic copies of the verification checks	
3	Record reference details on identity or transaction documents	
4	Keep photocopies of all identification documents presented for verification purposes	

## I. CONSUMER PROTECTION

I.1 Does your country have explicit laws and regulations on how the ID system's database interoperates with the financial sector for verification and authentication purposes?

	RESPONSE	Please indicate name of regulation and year issued
1	Yes	
2	No	

I.2 According to current law or regulation, please select the applicable mechanisms in place to obtain informed consent from individuals on the use of their data for verification and authentication purposes?

		YES/NO/NA
1	Written consent taken during account opening	
2	Written information on data use provided during account opening and implied consent with signing of account opening form	
3	Verbal consent taken during account opening	
4	No mechanisms in place to obtain informed consent	

**I.3 Are there any provisions in the existing laws and regulations that prohibit or restrict financial institutions from discriminating against certain segments such as women, indigenous populations, or based on faith, political affiliation?**

TYPE OF POPULATION	YES	NO
Women		
Peoples of Concern		
Minorities		

**I.4 Are there clear and transparent procedures to correct records and adjudicate or address grievances in case of data errors, or violation of consent, rights or data privacy?**

	YES	NO
Clear rules and procedures to correct data errors		
Clear rules to store data		
Clear rules on data portability		
Is biometric data considered sensitive data or special category of data		

If **YES**, go to **I.6**

If **NO**, skip to **SECTION J**

**I.5 What is the redress mechanism when consent, rights or data privacy has been violated? Describe all relevant**

1	Financial institution is required to address grievance claim within a set time-period	
2	Claims can be submitted to the agency that oversees the ID system	
3	Claims can be submitted to the Financial Regulator or Financial Ombudsman	
4	Approach legal court	
5	Other, specify:	

## J. MONITORING FOR AML/CFT PURPOSES

**J.1 What are the measures that financial service providers have in place to monitor for unusual and other HIGHER RISK transactions?**

		COMMERCIAL BANKS		MOBILE MONEY		NBEIs		MONEY TRANSFER COMPANIES		EXCHANGE COMPANIES		POSTAL OPERATORS	
		In house	Vendor	In house	Vendor	In house	Vendor	In house	Vendor	In house	Vendor	In house	Vendor
		Yes/No	Yes/No	Yes/No	Yes/No	Yes/No/	Yes/No/	Yes/No	Yes/No	Yes/No/	Yes/No	Yes/No/	Yes/No/
1	Manual/simple scanning of transactions												
2	Electronic scanning of transactions based on set parameters												
3	Electronic scanning of transactions based on artificial intelligence												
4	Other, specify:												

**J.2 What are the measures that financial service providers have in place to monitor people and entities in terrorist lists based on UN Security Council resolutions and other national agencies?**

		COMMERCIAL BANKS		MOBILE MONEY		NBEIs		MONEY TRANSFER COMPANIES		EXCHANGE COMPANIES		POSTAL OPERATORS	
		In house	Vendor	In house	Vendor	In house	Vendor	In house	Vendor	In house	Vendor	In house	Vendor
		Yes/No	Yes/No	Yes/No	Yes/No	Yes/No/	Yes/No/	Yes/No	Yes/No	Yes/No/	Yes/No	Yes/No/	Yes/No/
1	Manual/simple scanning of transactions												
2	Electronic scanning of transactions based on set parameters												
3	Electronic scanning of transactions based on artificial intelligence												
4	Other, specify:												

**J.3 What are the measures that financial service providers have in place to monitor *Politically Exposed Persons (PEP)*?**

		COMMERCIAL BANKS		MOBILE MONEY		NBEIs		MONEY TRANSFER COMPANIES		EXCHANGE COMPANIES		POSTAL OPERATORS	
		In house	Vendor	In house	Vendor	In house	Vendor	In house	Vendor	In house	Vendor	In house	Vendor
		YES/NO	YES/NO	YES/NO	YES/NO	YES/NO/	YES/NO/	YES/NO	YES/NO	YES/NO/	YES/NO	YES/NO/	YES/NO/
1	Manual/simple scanning of transactions												
2	Electronic scanning of transactions based on set parameters												
3	Electronic scanning of transactions based on artificial intelligence												
4	Other, specify:												

**K. E-KYC SOLUTIONS**

**K.1 Does your country have a KYC registry? Please fill in where applicable**

	KYC registry only for individuals	KYC registry only for legal entities	KYC registry only for both legal and individuals	The KYC registry includes Persons of Concern (individuals with refugee, stateless status and migrant status)
	YES/NO	YES/NO	YES/NO	YES/NO
Name of the public institution managing the KYC registry:				
Name of the private institution(s) managing the KYC registry:				

**K.2 If yes, please provide information on the following,**

FEATURES OF THE KYC REGISTRY		YES	NO
1	The KYC Registry is established by the Financial Regulatory Authority		
2	The KYC Registry is mandatory for all regulated entities		
3	The KYC Registry allows the participation of non-regulated entities		
4	The KYC Registry includes a list of mandatory data attributes		
4.1	If 4 yes, indicate the mandatory attributes		
5	The KYC registry collects biometric data from the customers		
6	The KYC registry verifies information against the national ID database		
7	Access to the KYC registry involves costs		

**K.3 Participants to the KYC registry? Please mark all that apply**

PARTICIPANTS	COVERS INDIVIDUALS (YES)	COVERS LEGAL ENTITIES (YES)	MANDATORY DATA SUBMISSION (YES)	INCENTIVES TO USE THE REGISTRY (YES) (e.g. lower requirements for operational risk, less frequent reviews)
Commercial Banks				
Other Banks				
Financial Cooperatives				
ODTIs				
MFIs				
NBEIs				
Mobile Money				
Insurance Providers				
Money Transfer Companies				
Broker Dealers				
Exchange Companies				
Virtual Currency				
Postal Operators				
Commercial Banks				
Other Banks				

#### K.4 Type of data collected in the registry

DATA FROM THE ACCOUNT OWNER	INDIVIDUALS	LEGAL ENTITIES (YES)
ID number (indicate type of ID)		
Mobile Phone Number		
SIM registration card		
Name and last name		
Date of birth		
Address		
Location		
Bank ID number		
Type of account		
<b>OTHER TYPE OF DATA FROM THE ACCOUNT</b>		
Destination of funds on wire transfers		
Address of wire destination account		
Location of wire destination account		
Monthly withdrawals		
Amount average		
Number of monthly transactions		
Details on beneficial owners		
Reason for the transaction		

**K.5 Usage of the KYC registry?**

Participants	Used for account opening new clients	Used for account opening existing clients	Used for face to face account opening	Used for remote account opening	Used for account access/ monitoring transactions/ other (please describe)
Commercial Banks					
Other Banks					
Financial Cooperatives					
ODTIs					
MFIs					
NBEIs					
Mobile Money					
Insurance Providers					
Money Transfer Companies					
Broker Dealers					
Exchange Companies					
Virtual Currency					
Postal Operators					
Commercial Banks					
Other Banks					

## L. DIGITAL ID SOLUTIONS OR E-KYC SOLUTIONS

KYC SOLUTIONS OR DIGITAL ID USED IN THE FINANCIAL SECTOR	YES	NO
Are there Digital ID (s) available in the country		
Is Digital ID broadly used by financial institutions?		
Is the Digital ID operated by the Public Sector?		
Is the Digital ID operated by the private sector?		
Is the Digital ID offered through a federated model?		
Are there more than one Digital ID used by financial institutions?		
Are international technical standards adopted by each system?		
Does the e-KYC solution allow client authentication?		
Is there a data governance framework in place that supports required levels of assurance for ID proofing?		
Is the authentication based on more than one factor?		
Are any of the factors used in the KYC solution mostly based on something you know? (i.e. passwords, passphrase, PIN, challenge response)		
If Digital ID is not broadly used indicate the main cause		
a) Lack of access		
b) Cost		
c) Not reliable (i.e. does not meet the levels of assurance required for the risk scenario)		
d) It is not recognized by the legal and regulatory framework for financial sector		
e) Not sufficient knowledge about the system		
Are there KYC solutions available in the market?		
Key feature of the KYC solution is offered in the form of software to meet compliance requirements?		
The KYC solution uses additional complimentary data from other sources?		
The KYC solution includes data from all potential new customers?		
The KYC solution is offered to a specific type of customers? (i.e. credit customers through credit bureaus or alike)		
The KYC solution is offered to all financial services providers		

## GLOSSARY

**API:** a set of functions and procedures allowing the creation of applications that access the features or data of an operating system, application, or other service.

**Commercial bank:** a bank that is (a) not subject by law or regulation to (i) a specified maximum size of loan or savings product or (ii) any limitation on type of client that may be served; and (b) not tasked by law or regulation with serving any particular industry.

**Consumer protection:** federal and state statutes governing sales and credit practices involving consumer goods.

**Customer due diligence (CDD):** comprises the facts about a customer that should enable an organization to assess the extent to which the customer exposes it to a range of risks. These risks include money laundering and terrorist financing.

**Deposit account:** deposit account held with banks and other authorized deposit-taking financial institutions that can be used for making and receiving payments. Such accounts are known in some countries as current accounts, chequing accounts or other similar terms.

**Digital ID Systems:** Digital ID systems are those that provide identity proofing and enrollment, binding (credentials with identity proofed individual) and authentication (is the person who claims to be) digitally and have the capabilities to store information associated with such processes in electronic form.

**e-KYC solution:** Electronic and online based know your customer (KYC) processes including digitization of records, verification of documents and attributes and authentication of a person.

**E-money:** monetary value represented by a claim on the issuer which is stored on an electronic device such as a chip card or a hard drive in personal computers or servers or other devices such as mobile phones and issued upon receipt of funds in an amount not less in value than the monetary value received and accepted as a means of payment by undertakings other than the issuer.

**Financial consumer protection legal and regulatory framework:** a set of legislative and regulatory instruments governing financial services providers practices with respect to their dealings with consumers.

**Financial cooperative:** a member-owned and member-controlled financial institution governed by the “one member one vote” rule. Financial cooperatives often take deposits or similar repayable funds from, and make loans only to, members, although some also serve non-members. The term includes credit unions, building societies, caisses, cajas, cooperative banks, mutual banks, and savings and credit cooperatives.

**Insurance:** is a contract, represented by a policy, in which an individual or entity receives financial protection or reimbursement against losses from an insurance company. The company pools clients' risks to make payments more affordable for the insured.

**Microcredit:** small-scale credit typically provided to self-employed or informally employed poor and low-income individuals and microenterprises. Other common features of microcredit include a lending methodology characterized by familiarity with the borrower, lack of collateral, expectation of a follow-on loan upon successful repayment, and very small loan amounts (although the size of microcredit varies from country to country).

**Microfinance institution (MFI):** a financial institution that does not take deposits and provides microcredit targeting low-income and poor customers.

**Mobile wallet:** A mobile wallet is a virtual wallet that stores payment card information on a mobile device.

**Non-bank E-money Issuer (NBEI):** an issuer of e-money that is not a bank. The relevant questions in the Survey request respondents to indicate whether the non-bank entity is authorized to act as an issuer of e-money.

**Other bank:** a bank other than a commercial bank. In a given country this term may include rural banks, agricultural banks, postal banks, among other types of non-commercial banks. (It does not include cooperative banks or mutual banks, which are categorized as financial cooperatives for the purposes of this Survey.)

**Other deposit-taking institution (ODTI):** an institution authorized to collect deposits or savings that does not fit the definition of bank or financial cooperative. ODTIs include deposit-taking microfinance institutions, savings and loan associations, among other non-bank deposit-taking institutions.

**Postal Operator:** Any public or private entity providing various types of postal services, including mailing, delivery and financial services.

