

AML / KYC Policy

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Daycano is a trade name of K&L Rock Simulations s.r.o., ID No. 300 34 221, Jičínská 226/17, Žižkov, 130 00 Prague 3. All trading takes place in a simulated environment; rewards are paid according to the programme rules.

This Policy forms part of the Daycano Terms of Service (Terms of Service, Sections 3 and 9). It sets out how and when Daycano verifies the identity of traders and how it prevents the misuse of its Services for financial crime. If it conflicts with the Terms of Service, the Terms of Service prevail.

1. Purpose and Basis

1.1 K&L Rock Simulations s.r.o., operating the Daycano brand ("Daycano", "we", "us"), has adopted this Policy to prevent the use of its Services for money laundering, terrorist financing, sanctions evasion, fraud or other financial crime.

1.2 The Programme is a simulated trading evaluation and not a financial service (Risk / Simulated Trading Disclaimer, Section 10). Daycano nevertheless applies identity verification and screening before any payment is made to a trader, as a matter of risk management and in line with the requirements of its payment service providers. This Policy draws on the standards of Act No. 253/2008 Sb., on Selected Measures against Legitimation of Proceeds of Crime and Financing of Terrorism, and the FATF Recommendations.

2. What Is Verified, and When

2.1 Identity verification ("KYC") is carried out once per trader, before that trader's first Performance Reward payout. No verification is required to purchase a Programme or to trade during the evaluation.

2.2 Until KYC is completed, no Performance Reward is paid; the account otherwise remains active and the payout is made once verification is completed. If verification fails, for example because a document is found to be forged, the trader is a sanctioned person or is connected to a restricted jurisdiction, the account may be terminated under the Terms of Service, Section 12.2(c) or (d).

2.3 KYC is not repeated for later payouts once completed, except where re-verification is required under Section 4 or the trader's identity details change.

2.4 Performance Rewards are paid only to a payment account or crypto wallet held in the name of the verified trader. Payments to third parties are not made.

3. Verification Process

3.1 Identity verification is performed through our identity verification provider, iDenfy, using an automated verification flow integrated into the platform.

3.2 The standard verification flow checks:

- a valid government-issued photo identity document (passport, national identity card or driving licence, as accepted by the provider);
- a liveness check (selfie) matched against the identity document; and
- the trader's full name, date of birth, nationality and country of residence, cross-checked against the document and the account data.

3.3 Results are automated in the first instance. Where the provider flags a document (for example poor image quality, a data mismatch or suspected tampering), the case is reviewed manually before any payout is approved.

4. Risk-Based Approach

4.1 Standard due diligence under Section 3 applies to all traders.

4.2 Enhanced due diligence ("EDD") applies where a trader:

- is connected to a jurisdiction under increased monitoring by the FATF (Restricted Countries List, Section 2.2);
- is identified through screening as a politically exposed person ("PEP"), or a family member or close associate of a PEP; or
- otherwise presents an elevated risk in our reasonable assessment, for example inconsistent identity information, unusual account activity, or a partial match on a sanctions or watchlist screen.

4.3 EDD may include a request for additional identity or proof-of-address documents, a declaration on the origin of the payment method used, or manual review before a payout is approved. If EDD cannot be completed satisfactorily, we may decline the payout or terminate the account. Where the law requires it, Daycano cooperates with competent authorities.

5. Sanctions and PEP Screening

5.1 Screening takes place only in connection with a payout. Before each Performance Reward payout, the trader is screened against the sanctions lists of the European Union, the United Nations and the U.S. Office of Foreign Assets Control, and against PEP databases. Before the first payout, screening is carried out as part of the verification flow under Section 3.

5.2 If screening identifies a trader as a sanctioned person, the trader is not verified, the payout is blocked and the account is suspended immediately.

6. Restricted Jurisdictions

6.1 Verification and payouts are subject to the Restricted Countries List at daycano.com/en/restricted-countries, which this Policy incorporates by reference. A trader connected to a jurisdiction listed as excluded in Section 2 of that List (Tiers 1, 3 and 4, and FATF call-for-action jurisdictions under Tier 2) is not verified, regardless of the outcome of the identity check itself.

7. Governance

7.1 Daycano has designated an AML Officer responsible for this Policy and for decisions on escalated cases under Sections 3.3, 4 and 5. The AML Officer can be contacted at [compliance@daycano.com].

7.2 This Policy is reviewed at least once a year, and after any material change to the Programme, Daycano's service providers or applicable law.

8. Record-Keeping and Data Protection

8.1 Identity verification records, screening results and EDD documentation are kept for 5 years from the end of the relationship with the trader, unless a longer period is required by law or for the establishment, exercise or defence of legal claims.

8.2 Personal data processed under this Policy is handled in accordance with the Privacy Policy, which sets out the legal basis for processing, the recipients (including iDenfy) and your rights.

9. Relationship to Other Documents

9.1 This Policy works together with the Restricted Countries List (geographic exclusions) and the Risk / Simulated Trading Disclaimer (regulatory position). Where they address the same subject, the more specific document applies to that subject.

10. Fraud Prevention

10.1 Each natural person may hold only one verified identity. A trader whose verification has failed may not open a new account under different contact details to avoid that outcome.

10.2 Accounts that share identity documents, payment methods, devices or IP addresses with accounts previously suspended or terminated for fraud, sanctions or breach of the Terms of Service are reviewed manually before any payout.