## 1. Anti-Money Laundering (AML) Policy

**Introduction:**
Jazzbo Technology FZCO strictly adheres to UAE Federal Decree-Law No. 20 of 2018 on Anti-Money Laundering (AML) and Counter-Terrorism Financing, as well as FATF guidelines, to prevent the misuse of our services for illicit purposes.

**Key Measures:**

- **Customer Due Diligence (CDD):**
  - Verify the identity of all customers during registration (KYC).
  - Conduct Enhanced Due Diligence (EDD) for high-risk users or regions.
  - Periodically review and update customer records.
- **Transaction Monitoring:**
  - Use automated tools to monitor transactions for suspicious patterns.
  - Flag and investigate unusual activity, such as large or frequent transactions from high-risk regions.
- **Record-Keeping:**
  - Maintain detailed records of transactions, customer data, and due diligence processes for at least 5 years.
- **Reporting Obligations:**
  - Report any suspicious activities to the UAE Financial Intelligence Unit (FIU) and other relevant authorities.
- **Global Compliance:**
  - Adapt AML practices to comply with local laws in countries where we operate, including the US Bank Secrecy Act and EU AML directives.

**Customer Responsibilities:**

- Provide accurate information during registration.
- Avoid engaging in transactions that violate local or international laws.

## 2. Counter-Terrorism Financing Policy

**Introduction:**
As a global company, Jazzbo Technology FZCO complies with UAE Federal Law No. 7 of 2014, FATF recommendations, and UN Security Council resolutions to prevent terrorism financing.

**Key Measures:**

- **Sanctions Screening:**
  - Regularly screen customers and transactions against UAE, OFAC, EU, and UN sanction lists.
  - Deny services to sanctioned individuals, entities, or regions.
- **Enhanced Risk Assessment:**
  - Flag and investigate users from high-risk regions (e.g., countries identified as terrorism hotspots).
  - Implement additional checks for transactions involving sensitive industries or technologies.
- **Collaboration with Authorities:**
  - Share relevant data with law enforcement and comply with legal requests.

**Customer Responsibilities:**

- Avoid using our services to fund prohibited activities.
- Notify us immediately if you suspect misuse of your account.

## 3. Modern Slavery and Human Trafficking Statement

**Introduction:**
[Company Name] is committed to eliminating modern slavery and human trafficking from our operations and supply chains, in compliance with the UK Modern Slavery Act 2015 and international human rights standards.

**Key Actions:**

- **Risk Assessments:**
  - Evaluate potential risks of modern slavery in partnerships, suppliers, and vendors.
- **Supplier Standards:**
  - Require suppliers to sign agreements confirming their compliance with anti-slavery laws.
  - Conduct audits of high-risk suppliers, particularly in regions with lower regulatory enforcement.
- **Training and Awareness:**
  - Provide regular training to employees on identifying and reporting signs of modern slavery.

**Employee and Customer Responsibilities:**

- Report any concerns about modern slavery via [hotline or email].
- Refuse to engage with organizations known to exploit forced labor.

## 4. Export Control and Sanctions Policy

**Introduction:**
[Company Name] complies with UAE export control laws, the US Export Administration Regulations (EAR), and other international sanctions regimes to ensure lawful trade.

**Key Actions:**

- **Customer Verification:**
  - Screen customers and transactions against global sanctions lists, including UAE, OFAC, and EU sanctions.
  - Restrict services to embargoed countries and denied parties.
- **Restricted Technologies:**
  - Prevent the unauthorized export of software or services that fall under controlled technologies (e.g., encryption tools).
- **Geographic Restrictions:**
  - Ensure compliance with specific export laws for servers located in the UAE, Asia, and the USA.
  - Use geo-blocking technologies to restrict access in embargoed regions.

**Customer Responsibilities:**

- Comply with applicable export control regulations in their jurisdiction.
- Avoid using our platform for prohibited activities or in restricted regions.

## 5. Know Your Customer (KYC) Policy

**Introduction:**
To ensure compliance with global AML and counter-terrorism laws, Jazzbo Technology FZCO implements a robust KYC policy.

**Key Components:**

- **Identity Verification:**
  - Require customers to provide valid government-issued identification and proof of address during registration.
  - Use automated KYC tools to verify information and detect fraudulent documents.
- **Risk-Based Approach:**
  - Classify customers based on risk levels (e.g., low, medium, high).
  - Conduct ongoing monitoring for high-risk customers.
- **Periodic Reviews:**
  - Update KYC information at regular intervals, especially for long-term users.

**Global Adaptation:**

- Align practices with regional KYC requirements, including FATCA in the US, AMLD in the EU, and UAE-specific guidelines.

## 6. Data Retention and Reporting Policy

**Introduction:**
Jazzbo Technology FZCO complies with UAE and international regulations for data retention to ensure transparency and accountability.

**Policy Details:**

- **Retention Periods:**
  - Store transaction records, user data, and communications for a minimum of 5 years.
- **Data Security:**
  - Ensure all retained data is encrypted and stored securely on servers in the UAE, Asia, and the USA.
- **Reporting:**
  - Cooperate with regulatory authorities by providing requested data promptly.
  - Maintain transparency with customers about how their data is stored and used.

## 7. General Compliance Statement

**Introduction:**
As a global SaaS provider, Jazzbo Technology FZCO is committed to adhering to all applicable local and international compliance standards.

**Key Areas of Focus:**

- **Privacy:** Comply with GDPR, CCPA, and UAE Federal Decree-Law No. 45 of 2021 on Personal Data Protection.
- **Security:** Follow ISO 27001 standards for data security and risk management.
- **Legal:** Stay up-to-date with global trade, tax, and compliance regulations.

**Monitoring and Updates:**

- Conduct regular audits to ensure compliance with changing laws.
- Engage with legal experts to address compliance gaps and risks.