

# Know Your Customer (KYC) Policy

BC Tech Private Limited (“BriteX”)

## 1. Introduction

BC Tech Private Limited (“BriteX”, “we”, “our”, or “us”) is committed to operating a secure, transparent, and compliant platform. This Know Your Customer (“KYC”) Policy sets out the identity verification, due diligence, monitoring, and record-retention framework applicable to users who access or use services offered through the BriteX platform.

The objectives of this Policy are to:

- Verify the identity of users.
  - Prevent identity theft and fraud.
  - Mitigate risks related to money laundering and terrorist financing.
  - Comply with applicable laws, regulations, and regulatory directions in India.
  - Maintain the integrity, safety, and security of the BriteX platform.
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## 2. Applicability

This Policy applies to all individuals, sole proprietors, companies, partnerships, trusts, institutions, and other legal entities that seek to access or use services offered by BriteX.

BriteX may require completion of KYC verification before onboarding, enabling specific services, processing transactions, increasing limits, or continuing access where required for legal, regulatory, risk, or operational reasons.

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## 3. Customer Identification and Information Collection

Depending on the nature of the user, service, transaction, and applicable legal requirements, BriteX may collect and verify the following information.

### 3.1 Individual Customers

- Full legal name
- Date of Birth
- Nationality
- Residential Address
- Mobile Number
- Email Address
- Permanent Account Number (PAN), where applicable
- Aadhaar (where legally permitted and voluntarily provided), or other officially valid documents
- Passport, Driving Licence, Voter ID, or any other Officially Valid Document (OVD), where applicable
- Self-photograph (Selfie)
- Live facial verification, if required

### 3.2 Business or Institutional Customers

- Certificate of Incorporation
  - PAN of the entity
  - GST Registration (where applicable)
  - Registered Office Address
  - Authorized Signatory Details
  - Beneficial Ownership Information
  - Board Resolution/Authorization Letter (if applicable)
  - Any additional information required under applicable laws
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## 4. KYC Verification Process

KYC verification may include one or more of the following checks, depending on the applicable risk category, service type, and regulatory requirement:

- Document verification

- Identity authentication
- Address verification
- Mobile and email verification
- Facial verification, liveness detection, or video-based verification, where applicable and legally permitted
- Risk assessment
- Screening against applicable sanctions or watchlists where required by law

BriteX may request additional information, clarification, or documents where necessary to complete verification, assess risk, comply with law, or investigate suspicious or inconsistent information.

Verification may be conducted directly by BriteX or through authorised third-party service providers, subject to appropriate confidentiality, security, and legal safeguards.

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## 5. Ongoing Due Diligence and Periodic Updates

BriteX may review customer information and account activity on an ongoing or periodic basis to ensure that records remain accurate, complete, and consistent with the user's risk profile and platform activity.

Users may be required to:

- Update expired documents.
- Re-submit KYC information.
- Provide additional documents if account activity changes significantly.
- Complete enhanced verification where required.

Failure to complete requested updates or verification may result in temporary restrictions, suspension, rejection of transactions, or termination of access to certain services.

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## 6. Enhanced Due Diligence (EDD)

BriteX may apply enhanced due diligence for customers, transactions, or activities that present higher risk, including but not limited to:

- High-value transactions

- Unusual transaction patterns
- Politically Exposed Persons (PEPs), where applicable
- Cross-border activities
- Any activity identified as higher risk under applicable law

Where EDD is required, BriteX may request additional documentation, senior-level review, source-of-funds or source-of-wealth information, transaction explanations, or other verification before services are enabled or continued.

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## 7. Source of Funds and Source of Wealth

Where required by law, risk assessment, transaction monitoring, or internal policy, users may be asked to provide information or documents showing the lawful source of funds or source of wealth used in connection with platform activities.

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## 8. Record Retention

BriteX may retain KYC records, verification documents, transaction-related information, audit trails, and related compliance records for the period required under applicable Indian laws, regulatory directions, contractual obligations, or legitimate compliance requirements.

Records may be retained in physical or electronic form and may be securely archived or deleted when retention is no longer required, subject to applicable legal obligations.

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## 9. User Responsibilities

Users agree to:

- Provide accurate and complete information.
- Promptly notify BriteX of material changes to their information.
- Cooperate with verification requests.
- Avoid submitting false, forged, or misleading documents.

Submitting false, forged, incomplete, inaccurate, or misleading information may result in rejection of verification, restriction, suspension, termination of access, cancellation of transactions, and reporting to competent authorities where legally required or permitted.

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## 10. Privacy and Data Protection

Personal information collected during KYC verification will be handled in accordance with the BriteX Privacy Policy and applicable data protection laws, including requirements relating to lawful processing, purpose limitation, security safeguards, retention, and user rights.

KYC information will be used only for lawful purposes, including identity verification, compliance, fraud prevention, risk management, platform security, dispute resolution, regulatory reporting, and fulfilment of legal obligations.

BriteX may share KYC information with authorised service providers, regulators, law enforcement agencies, financial partners, auditors, or professional advisers where required or permitted by law and subject to appropriate safeguards.

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## 11. Refusal, Suspension, or Termination

BriteX may refuse onboarding, suspend services, restrict transactions, or terminate access where:

- Identity cannot be satisfactorily verified.
  - Fraudulent or forged documents are submitted.
  - Required information is withheld.
  - Applicable legal or regulatory obligations require such action.
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## 12. Regulatory Compliance

BriteX is committed to complying with applicable Indian laws and regulatory requirements relating to customer identification, anti-money laundering (AML), counter-terrorist financing (CTF), sanctions screening, fraud prevention, financial crime risk management, data protection, and platform security.

Users are responsible for ensuring that their use of the BriteX platform complies with all applicable laws, regulations, and contractual obligations.

Nothing in this Policy limits BriteX's right to take steps required by law, regulatory direction, court order, enforcement request, internal risk assessment, or platform security requirement.

## 13. Sanctions, Watchlist, and Risk Screening

BriteX may screen users, beneficial owners, authorised signatories, transactions, and related parties against applicable sanctions lists, watchlists, adverse media sources, politically exposed person databases, and other risk indicators where required or appropriate.

If screening identifies a potential match or elevated risk, BriteX may delay, reject, review, restrict, or report the relevant activity in accordance with applicable law and internal compliance procedures.

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## 14. Changes to this Policy

BriteX may update this Policy from time to time to reflect legal, regulatory, operational, technological, or risk-management developments.

The updated version will be published on the website or otherwise made available with a revised effective date. Continued use of the platform after publication of the updated Policy may be treated as acceptance of the updated terms, subject to applicable law.

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## 15. Contact

For questions regarding this Policy, KYC verification, or compliance-related requests, please contact:

**Grievance Officer / Compliance Team**  
**BC Tech Private Limited**

**Email:** [bctechpytltd0120@gmail.com](mailto:bctechpytltd0120@gmail.com)

**Phone:** +91 3474 353034