



02.

Appointing an

reports (STRs).

if necessary.

AML/ATF Officer

A key hire for any FinTech, this person is a member of senior management, establishes compliance programs, and submits suspicious transaction

The officer will also consider how to

function and how it can scale quickly

best staff the wider compliance

CDD

STRs/ SARs

Customers

Registering with FINTRAC

01.

Financial

Intelligence Unit

The first foundational step for FinTechs is registering with FINTRAC. Even firms

Law Enforcement

Agency

operating in Canada should review the latest guidance from the regulator, as registration requirements can change quickly. For example, following changes effective from April 5, 2022, some payment transfers such as credit,

debit, and pre-paid products may now meet the definition of exchange-traded funds (ETFs).



Your Customer measures (KYC)

03.

Verifying customers' identities at onboarding, and monitoring behavior throughout the client lifecycle, is a core responsibility of the compliance team.

Conducting Customer Due

Diligence (CDD) and Know

ongoing process, with the level of diligence applied based on a firm's risk appetite and risks related to particular products and customers.

Firms should see this as a dynamic,



the cause for concern, FinTechs must report the issue to the designated AML/ATF Officer.

They will submit a report to the Financial Intelligence Unit (FIU), in this case, FINTRAC, through authorized channels. FinTechs should have policies, procedures, and training detailing how to submit STRs to FINTRAC.



Maintaining appropriate records

in steps one to four must be maintained via proper records for a minimum period of time. This data can also support information-sharing, e.g., through

Data generated by the processes listed

05.

public-private partnerships. These are increasingly popular with regulators as a way to identify common threats and best practices.





responsibilities that arise from Canada's AML/ATF regime and how FinTechs should respond using a risk-based approach.

Download the guide

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