

Anti-Money Laundering (AML) Policy

Trakfox Ltd

1. Policy Overview

Trakfox Ltd is committed to conducting its business with integrity, transparency, and in compliance with applicable anti-money laundering AML and counter-terrorist financing CTF principles.

This Anti-Money Laundering Policy explains the procedures, controls, and standards followed by Trakfox Ltd to reduce the risk of its services, website, payment systems, and commercial relationships being used for money laundering, terrorist financing, fraud, or other unlawful financial activity.

Trakfox Ltd is registered and operates in Bulgaria, while offering car-related services, online consultations, and related commercial support to customers in Bulgaria, Europe, Asia, and other international markets.

2. Objective of the Policy

The objectives of this AML Policy are to:

Prevent Trakfox Ltd from being used as a channel for money laundering, terrorist financing, fraud, or other financial crime.

Establish reasonable procedures for identifying and managing financial crime risks connected to customers, payments, and business relationships.

Promote transparent and ethical business practices in connection with car sales, car consultations, vehicle sourcing, buyer support, and other related services.

Ensure that payments received by Trakfox Ltd are linked to legitimate commercial activity and clearly identifiable services.

Support compliance with applicable Bulgarian, European Union, and internationally recognised AML standards.

3. Scope of the Policy

This policy applies to:

All directors, employees, representatives, contractors, and authorised persons acting on behalf of Trakfox Ltd.

All customers purchasing services through the website or entering into business relationships with the company.

All online consultations, car-related services, buyer support services, vehicle sourcing assistance, and related transactions.

All payments received by Trakfox Ltd, including bank transfers and card payments made through the website.

All business relationships involving customers, service providers, partners, intermediaries, or counterparties located in Bulgaria, Europe, Asia, or other jurisdictions.

4. Business Activity Covered by This Policy

Trakfox Ltd provides services connected to the automotive sector, including but not limited to:

Online car-buying consultations.

Vehicle selection and buyer support.

Assistance for customers seeking luxury or premium vehicles.

Car ownership consultation and after-purchase support.

General automotive advisory services.

Online service packages purchased through the website.

Where applicable, Trakfox Ltd may also provide support connected to vehicle sourcing, documentation, and communication with third-party partners or sellers. The company does not support anonymous or unclear transactions and requires that all commercial activity has a legitimate business purpose.

5. Legal Compliance

Trakfox Ltd operates from Bulgaria and aims to comply with applicable Bulgarian legislation, European Union AML principles, and recognised international standards relating to the prevention of money laundering and terrorist financing.

The company takes reasonable steps to ensure that its internal procedures remain aligned with legal obligations, regulatory expectations, and the nature of its business activity.

Where a transaction, customer profile, payment method, or jurisdiction presents a higher risk, Trakfox Ltd may apply enhanced checks before accepting, processing, or continuing the business relationship.

6. Risk-Based Approach

Trakfox Ltd applies a risk-based approach to AML compliance. This means that the level of review and verification may depend on the type of customer, the value of the transaction, the payment method, the country involved, and the nature of the requested service.

The company may assess risks connected to:

Customer identity and background.

Customer location or country of residence.

Business or ownership structure, where the customer is a company.

Payment amount, frequency, and source.

Use of bank transfer or card payment.

Requests involving high-value vehicles or luxury cars.

Unusual transaction patterns.

Customers or counterparties from higher-risk jurisdictions.

Requests that appear inconsistent with the customer's profile or stated purpose.

Transactions involving unclear beneficiaries, third parties, or intermediaries.

Higher-risk cases may require additional documents, manual review, or refusal of service.

7. Customer Identification and Verification

Before providing certain services or accepting higher-value transactions, Trakfox Ltd may request information to identify and verify the customer.

For individual customers, this may include:

Full name.

Contact details.

Billing address.

Country of residence.

Identification document, where required.

Information about the purpose of the service request.

Confirmation that the customer is acting on their own behalf.

For corporate customers, this may include:

Company name.

Company registration number.

Registered address.

Company website or business profile.

Details of directors, representatives, or authorised persons.

Information about beneficial ownership, where applicable.

Business registration documents or official company records.

Trakfox Ltd may refuse to provide services if the customer does not provide sufficient information or if the provided information appears false, incomplete, inconsistent, or unverifiable.

8. Payment Methods and Payment Review

Trakfox Ltd accepts payments through:

Bank transfer.

Card payments through the website.

All payments must be made from legitimate sources and should correspond to the service purchased or agreed with the company.

Trakfox Ltd does not knowingly accept payments that appear to be connected to criminal activity, fraud, terrorist financing, sanctions evasion, or unclear third-party arrangements.

The company may review payments where:

The amount is unusually high compared to the service requested.

Multiple payments are made in a short period without clear commercial reason.

The cardholder or bank account holder does not match the customer.

A customer requests payment from or refund to a different person or account.

The payment originates from a higher-risk jurisdiction.

The payment explanation is unclear or inconsistent.

The customer refuses to provide requested clarification.

Where required, Trakfox Ltd may delay, reject, or refund a payment subject to internal review and applicable legal requirements.

9. Online Consultation Services

Customers may purchase car-related consultation services fully online through the Trakfox Ltd website.

These services may include buyer guidance, vehicle selection advice, ownership support, market information, or other automotive advisory services.

Although online consultations may be completed remotely, Trakfox Ltd reserves the right to request additional information where the customer profile, payment behaviour, location, or service request creates an AML, fraud, or compliance concern.

The company does not allow online services to be used for:

Concealing the identity of a customer or beneficial owner.

Creating artificial invoices or misleading payment reasons.

Processing payments unrelated to genuine services.

Moving funds without a legitimate commercial purpose.

Misrepresenting the nature of a transaction.

10. Monitoring of Business Relationships

Trakfox Ltd may monitor customer relationships and transactions on an ongoing basis to ensure that activity remains consistent with the expected purpose of the service.

Monitoring may include reviewing:

Payment history.

Customer communication.

Service requests.

Billing details.

Transaction amounts.

Geographic risk.

Refund requests.

Repeated or unusual transactions.

If activity appears suspicious, inconsistent, or unexplained, Trakfox Ltd may request additional clarification or documents from the customer.

11. Enhanced Due Diligence

Enhanced Due Diligence may be applied in higher-risk situations.

This may include cases involving:

High-value transactions.

Luxury vehicle-related requests.

Corporate clients with complex ownership structures.

Customers located in or connected to higher-risk countries.

Payments made by third parties.

Mismatch between customer name and payment details.

Unusual refund requests.

Customers who are politically exposed persons, where identified.

Any situation that appears inconsistent with normal commercial activity.

Enhanced Due Diligence may include requesting additional identification, proof of address, business documents, source of funds information, or explanation of the transaction purpose.

12. Suspicious Activity Awareness

Trakfox Ltd expects all persons acting on behalf of the company to remain alert to potential suspicious activity.

Examples of suspicious activity may include:

A customer refusing to provide identity or payment information.

A customer using inconsistent names, addresses, or contact details.

A customer requesting false or misleading invoices.

A customer attempting to split payments without clear reason.

A customer requesting refunds to a different card, account, or third party.

A customer offering unusual explanations for payment activity.

A customer attempting to hide the real buyer or beneficiary.

A transaction with no clear commercial purpose.

A request involving unusually complex arrangements for a simple service.

If suspicious activity is identified, Trakfox Ltd may take internal action, refuse the transaction, terminate the business relationship, and, where required, cooperate with competent authorities.

13. Record Retention

Trakfox Ltd maintains appropriate records connected to AML and compliance procedures.

These records may include:

Customer identification information.

Business registration documents.

Payment records.

Invoices and service confirmations.

Communication with customers.

Compliance checks.

Internal review notes.

Transaction details.

Records are stored securely and retained for a reasonable period in line with legal, regulatory, tax, accounting, and operational requirements.

14. Confidentiality and Data Protection

Information collected for AML, fraud prevention, payment verification, and compliance purposes is handled confidentially.

Trakfox Ltd uses such information only for legitimate business, compliance, legal, accounting, and risk-management purposes.

Access to such information is restricted to authorised persons only.

Personal data is handled in accordance with applicable data protection requirements, including relevant Bulgarian and European Union data protection rules.

15. Staff Awareness and Compliance Culture

Trakfox Ltd promotes a culture of compliance, transparency, and responsible business conduct.

Directors, employees, contractors, and representatives are expected to understand the importance of AML principles and to follow internal procedures when dealing with customers, payments, and unusual activity.

The company may provide internal guidance or training where necessary to ensure that staff can identify and respond to AML and fraud-related risks.

16. Internal Oversight

Management of Trakfox Ltd is responsible for overseeing AML procedures and ensuring that the company maintains appropriate controls for its business model.

This includes:

Reviewing higher-risk transactions.

Approving or rejecting unusual customer relationships.

Ensuring records are properly maintained.

Updating internal procedures when risks change.

Ensuring that payment activity remains linked to genuine services.

Reviewing customer or transaction concerns where necessary.

The company may update this policy periodically to reflect changes in law, business operations, payment methods, or risk exposure.

17. International Customers

Trakfox Ltd provides services to customers in Bulgaria, Europe, Asia, and other international markets.

Because international transactions may involve different legal systems, banking practices, and compliance risks, Trakfox Ltd may apply additional checks to customers or payments from certain jurisdictions.

The company reserves the right to refuse services where it cannot reasonably verify the customer, payment source, transaction purpose, or legitimacy of the requested service.

18. Refunds and Chargebacks

Refunds, where applicable, will normally be made only to the original payment method used by the customer.

Trakfox Ltd may refuse refund instructions that involve:

Refunding to a different person.

Refunding to a different bank account or card.

Refunding to a third-party account.

Splitting refunds between multiple accounts.

Any arrangement that appears designed to obscure the origin or destination of funds.

Where a payment dispute, chargeback, or fraud concern arises, Trakfox Ltd may review the transaction and retain relevant records for compliance and legal purposes.

19. Zero-Tolerance Approach

Trakfox Ltd maintains a zero-tolerance approach toward money laundering, terrorist financing, fraud, sanctions evasion, false documentation, and other unlawful financial activity.

The company reserves the right to decline, suspend, or terminate services where:

The customer cannot be properly identified.

The transaction purpose is unclear.

The payment appears suspicious.

The customer provides false or misleading information.

The transaction appears unrelated to genuine services.

The customer refuses reasonable compliance checks.

The business relationship creates unacceptable legal, reputational, or financial risk.

20. Operational Transparency Clause

Trakfox Ltd does not engage in or support business arrangements designed to conceal ownership, hide the source of funds, misrepresent commercial activity, or create artificial transactions without legitimate economic purpose.

The company may refuse services, suspend cooperation, cancel an order, or terminate a customer relationship if transparency regarding the customer, payment source, beneficial ownership, or business purpose cannot be reasonably verified.

21. Website Use and Customer Responsibility

By using the Trakfox Ltd website, purchasing services, or making payments, customers confirm that:

They are acting lawfully and in good faith.

The information they provide is accurate and complete.

Payments are made from legitimate sources.

They are not using Trakfox Ltd services for unlawful financial activity.

They will provide additional information if reasonably requested for compliance purposes.

They understand that Trakfox Ltd may refuse or suspend services where compliance concerns arise.

22. Policy Updates

Trakfox Ltd may update this AML Policy from time to time to reflect changes in legal requirements, business operations, payment methods, risk exposure, or internal procedures.

The latest version of the policy will be made available on the company's website.

23. Contact

For questions regarding this AML Policy, customers may contact Trakfox Ltd through the official contact details provided on the company's website.

This Anti-Money Laundering Policy forms part of the compliance and transparency framework of Trakfox Ltd and applies to all customers, services, payments, and business relationships connected to the company.