

## **FOOTSTOCK SOURCE OF WEALTH AND SOURCE OF FUNDS POLICY**

### **Why might we ask for further information from you?**

As an online gambling operator licensed by the Gambling Commission of Great Britain, we are required by law and the conditions of our licence to adopt certain measures to prevent our business from being associated with crime or being used to support crime.

These measures require us to know our customers and conduct a review of customers who exceed certain financial thresholds or limits, or who show certain usage patterns and to make enquiries of those customers to ensure we understand where the money they are spending has come from. This enables us to understand you better and provide a better customer experience, as well as protecting all of our customers.

As part of this process, we may need to ask you to provide evidence that the funds that you spend on Footstock are legitimately obtained and that they are sufficient to support your level of spending. Whilst we understand that you may find this intrusive, all operators licensed by the Gambling Commission have the same obligations. For further information on these requirements, please see the Gambling Commission's website [here](#)

### **What information might we ask you for?**

We may write to you and ask you to provide evidence showing us where the funds you use on Footstock have come from. This is known as your 'Source of Funds'.

Depending on what the source of the funds is, such evidence could include:

- Copies of three months' bank statements from the bank account that you use to fund your Footstock account showing consistent incoming values from an identifiable, legitimate source;
- Proof of income documentation in the form of either: (i) 3 months' payslips; (ii) a P60; or (iii) a personal tax return;
- A trust deed showing a consistent entitlement to funds or inheritance;
- Evidence of withdrawals from savings or other investments or a pension;
- Evidence of winnings recently paid to you by another gambling operator licensed by the Gambling Commission;
- Evidence of director remuneration or dividend receipts;
- Dated proof of an award or other payment made to you from a legitimate source; or
- Other evidence that proves you can afford what you are spending with us.

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We may also need evidence to identify how you came to have the funds that you use on Footstock. This is known as your 'Source of Wealth'. Depending on what the source of your wealth is, such evidence could include:

- A share, business or asset sale agreement (where you were a seller);
- Evidence of business ownership (e.g. a register of members or share certificate);
- Evidence of investments; or
- Evidence of savings (and the accumulation of savings over a period of time).

### **What will we do with your information?**

We will review the evidence that you provide and in certain circumstances, we may need to ask you for further information. If this happens, we will contact you to discuss the matter and try to suggest specific documents that may help to satisfy our enquiries. There will always be a Footstock team member handling your case (i.e. it will not be automated) and as always, we will be friendly and try our best to be as quick as possible.

We will not share the information with any other businesses. The information you provide will only be used to comply with our legal and regulatory obligations. We will store your information securely and handle it in line with our privacy policy.

Do bear in mind that monitoring your levels of spend and spending patterns is an ongoing obligation. We may need to ask you for additional or updated documentation in the future.

### **What if you don't give us the information requested?**

If you refuse, or are unable to provide us with satisfactory information within a reasonable time, we may have to take steps to suspend or close your account until such time as you can provide us with satisfactory documents. If you are having difficulties providing the information we request, please contact us to discuss it further.

### **How can you help speed up the process?**

Please make sure:

- Your contact details are up to date. This will help us contact you quickly, as and when we need to;
- You email your documents to us at [compliance@footstock.com](mailto:compliance@footstock.com) and include your username in the email; and
- You send us clear and legible copies of your documents.

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The sooner you provide the necessary information, the sooner we can review it and get back to you.

If you have any questions or concerns in relation to our requests, please contact us at [compliance@footstock.com](mailto:compliance@footstock.com) or [help@footstock.com](mailto:help@footstock.com).

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