## JMLSG Board approved Consultation May 2023

## 5.3.89

Where identity is verified electronically, copy documents are used, or the customer is not physically present<sup>1</sup>, a firm should apply an additional verification check to manage the risk of impersonation fraud by directly linking the customer to the claimed identity. In this regard, firms should consider:

- verifying with the customer additional aspects of their identity which are held electronically;
  or
- utilising biometric data (including facial recognition<sup>2</sup>); or
- requesting the applicant to confirm a secret code, or biometric factor, such codes, digital verification, or other secret data may be set up within the identity, or may be supplied to a verified mobile phone, or through a verified bank account, on a one-time basis, or
- following the guidance in paragraph 5.3.90.

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<sup>&</sup>lt;sup>1</sup> With appropriate controls in place non face-to-face may not pose a higher risk

<sup>&</sup>lt;sup>2</sup> For example, via a UK government certified digital identity service provider (IDSP)