Individual Identification Information Record

NOTE: An Individual Identification Information Record is required by the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act*. This Record must be completed by the REALTOR® member whenever they act in respect to the purchase or sale of real estate.
It is recommended that the Individual Identification Information Record be completed:

(i) for a buyer when the offer is submitted and/or a deposit made, and
(ii) for a seller when the seller accepts the offer.

Transaction Property Address: . . . . . .

Sales Representative/Broker Name: . . . . . .
Date Information Verified/Credit File Consulted: . . . . . .

A. Verification of Individual

NOTE: One of Section A.1, A.2. or A.3 must be completed for your individual clients or unrepresented individuals that are not clients, but are parties to the transaction (e.g. unrepresented buyer or seller) .

1. Full legal name of individual: . . . . . .
2. Address: . . . . . .

3. Date of Birth: . . . . . .
4. Nature of Principal Business or Occupation: . . . . . .

A.1 Federal/Provincial/Territorial Government-Issued Photo ID

Ascertain the individual's identity by comparing the individual to their photo ID. The individual must be physically present unless using technology capable of assessing a government-issued photo identification document's authenticity.

1. Type of Identification Document*: ☐ Driver license ☐ Passport ☐ Other, explain . . . . . .
(must view the original and have a photo)
2. Document Identifier Number: . . . . . .
3. Issuing Jurisdiction: . . . . . **Country:** . . . . . .
(insert applicable Province, Territory, Foreign Jurisdiction or "Canada")
4. Document Expiry Date: . . . . . .
(must be valid and not expired)

A.2 Credit File Method

Ascertain the individual's identity by comparing the individual's name, date of birth and address information above to information in a Canadian credit file that has been in existence for at least three years and is derived from more than one source. If any of the information does not match, you will need to use another method to ascertain client identity. Consult the credit file at the time you ascertain the individual's identity. The individual does not need to be physically present.

1. Name of Canadian Credit Bureau Holding the Credit File: . . . . . .

2. Reference Number of Credit File: . . . . . .

A.3 Dual ID Process Method

1. Complete two of the following three checkboxes by ascertaining the individual's identity by referring to information in **two** independent, reliable, sources. Each source must be well known and reputable (e.g., federal, provincial, territorial and municipal levels of government, crown corporations, financial entities or utility providers). The individual does not need to be physically present.

☐ Confirm the individual's name and date of birth by referring to a document or source containing the individual's name and date of birth*

- ○ **Name of Source:** . . . . . .
- ○ **Account Number**:** . . . . . .
(must be valid and not expired; must be recent if no expiry date)

☐ Confirm the individual's name and address by referring to a document or source containing the individual's name and address*

- ○ **Name of Source:** . . . . . .
- ○ **Account Number**:** . . . . . .
(must be valid and not expired; must be recent if no expiry date)

☐ Confirm the individuals' name and confirm a financial account*

- ○ **Name of Source:** . . . . . .
- ○ **Financial Account Type:** . . . . . .
- ○ **Account Number**:** . . . . . .

*See CREA's FINTRAC materials on CREA's Member Portal for examples. ** Or reference number if there is no account number.

REALTOR®

This document has been prepared by The Canadian Real Estate Association ("CREA") to assist members in complying with requirements of *Canada's Proceeds of Crime (Money Laundering)* and *Terrorist Financing Regulations*.
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CREA WEBForms®

Individual Identification Information Record

B. Verification of Third Parties

NOTE: Take reasonable measures to determine whether your clients are acting on behalf of third parties by completing this section of the form. If you are not able to determine whether your clients are acting on behalf of a third party but there are reasonable grounds to suspect there are, complete Section B.1. If there is a third party, complete Section B.2.

B.1 Third Party Reasonable Measures

Is the transaction being conducted on behalf of a third party according to the client? *(check one):*

☐ Yes
☐ No

Describe why you think your client may be acting on behalf a third party:

B.2 Third Party Record

Where there is a third party, complete this section.

1. Name of third party: . . . . . .
2. Address: . . . . . .
3. Telephone number: . . . . . .
4. Date of Birth *(if applicable)***:** . . . . . .
5. Nature of Principal Business or Occupation: . . . . . .
. . . . . .
6. Registration or incorporation number, and jurisdiction and country that issued that number *(if applicable)***:** . . . . . .
. . . . . .
7. Relationship between third party and client: . . . . . .
. . . . . .

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C. Client Risk

Part 1: Answer the following questions by circling the answer that applies:

#	Question			
1	Prior to this transaction, did you previously work with this client or have a personal relationship with them?	☐ Yes	☐ No	
2	To your knowledge, does the client have a criminal history in regards to illegal drug trafficking, bribery, fraud, forgery, murder, robbery, counterfeit money, stock manipulation, tax evasion or copyright infringement?	☐ Yes	☐ No	☐ Possibly
3	To your knowledge, is there a concern about money laundering or terrorist financing in the geographic location of the property or your brokerage location?	☐ Yes	☐ No	☐ Possibly
4	Does the client live within 10 km of an international border or 5 km of an international airport?	☐ Yes	☐ No	
5	Is the client a Canadian citizen or permanent resident?	☐ Yes	☐ No	☐ Unknown
6	Is the client a domestic PEP or a family member/close associate of one?	☐ Yes	☐ No	
7	Is the client a foreign PEP or HIO or a family member/close associate of one?	☐ Yes	☐ No	
8	Is the client subject to a Ministerial Directive? (see Ministerial Directive applicable to North Korea, Russia, etc.).	☐ Yes	☐ No	
9	Are you aware of any other connection to the client and a high-risk country? If yes or possibly, explain:	☐ Yes	☐ No	☐ Possibly
10	Has the client attempted to conceal their identity in any way (e.g. use an intermediary like a lawyer, refuse to provide ID at any point, etc.)	☐ Yes	☐ No	
11	Has your brokerage previously filed a suspicious transaction or terrorist property report on this client?	☐ Yes	☐ No	
12	Does the transaction seem unusual in light of the client's occupation? If yes, explain:	☐ Yes	☐ No	
13	Does the transaction involve a third party?	☐ Yes	☐ No	☐ Possibly
14	Did you ID the client in a non-face-to-face setting?	☐ Yes	☐ No	
15	Did the client provide some or all of the deposit in cash?	☐ Yes	☐ No	
16	Does the transaction seem unusual in light of the client's past transactions with the brokerage?	☐ Yes	☐ No	
17	Is there anything else unusual about the client or the transaction? If yes, explain:	☐ Yes	☐ No	

Part 2: Circle the number below that corresponds to the responses you provided in Part 1. Add up all the numbers in all columns to get a total risk score for the client:

Q#	Yes	No	Unknown/Possibly
1	0 ☐	2 ☐	0 ☐
2	10 ☐	0 ☐	1 ☐
3	2 ☐	0 ☐	1 ☐
4	2 ☐	0 ☐	N/A ☐
5	0 ☐	2 ☐	1 ☐
6	6 ☐	0 ☐	N/A ☐
7	10 ☐	0 ☐	N/A ☐
8	10 ☐	0 ☐	N/A ☐
9	5 ☐	0 ☐	1 ☐

Q#	Yes	No	Unknown/Possibly
10	6 ☐	0 ☐	N/A ☐
11	10 ☐	0 ☐	N/A ☐
12	5 ☐	0 ☐	N/A ☐
13	2 ☐	0 ☐	1 ☐
14	2 ☐	0 ☐	N/A ☐
15	3 ☐	0 ☐	N/A ☐
16	4 ☐	0 ☐	N/A ☐
17	4 ☐	0 ☐	N/A ☐
Total			

Part 3: This form is intended to provide a rough approximation of risk and is not intended to replace a sales representative's judgment. If the score is 10 or above or you are uncertain about what score to apply, seek guidance from your Compliance Officer.

Part 4: Apply the following measures according to the client risk score that was approved in Part 3:

< 10: client is not high risk. No additional steps required.

≥ 10: client is high risk. Speak to Compliance Officer and apply high risk measures, such as asking for an additional piece of ID or conducting an Internet search of the client.

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D. Business Relationship

D.1. Purpose and Intended Nature of the Business Relationship

Check the appropriate boxes.

Acting as an agent for the purchase or sale of:

- ☐ Residential property
- ☐ Residential property for income purposes
- ☐ Commercial property
- ☐ Land for Commercial Use
- ☐ Other, please specify: . . . . . .

Optional: describe your business dealings with the client and include information that would help you anticipate the types of transactions and activities that the client may conduct.

D.2. Measures Taken to Monitor Business Relationship and Keep Client Information Up-To-Date

D.2.1. Ask the client if their name, address or principal business or occupation has changed and if it has include the updated information on page one.

D.2.2 Keep all relevant correspondence with the client on file in order to maintain a record of the information you have used to monitor the business relationship with the client. Optional - if you have taken measures beyond simply keeping correspondence on file, specify them here:

D.2.3. If the client is high risk you must conduct enhanced measures to monitor the brokerage's business relationship and keep their client information up to date. Optional - consult your Compliance Officer and document what enhanced measures you have applied:

D.3 Suspicious Transactions

Don't forget, if you see something suspicious during the transaction report it to your Compliance Officer. Consult your policies and procedures manual for more information.

E. Listed Person or Entity Property Reports

Don't forget to follow your brokerage's procedures with respect to listed person or entity property reports. Consult your policies and procedures manual for more information.

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