

PROFILE DELETIONS CRITERIA

Thomson Reuters periodically remove World-Check profiles, or remove details from profiles, for various reasons, including:

- a disqualification period ends
- complete removal from a law or regulatory enforcement list
- the individual should no longer be defined as a PEP
- a profile has been duplicated
- a change to the circumstances that we originally profiled
- aged post-conviction information

Just as we are careful about adding profiles, we are equally careful when deciding to delete them, or to remove details from an existing profile. Here are some of the most common reasons for the removal of profiles or details contained within profiles.

DISQUALIFIED DIRECTORS

As a matter of course, we profile individuals who are so-called Disqualified Directors. Disqualification, however, is for a limited time only and once the period is at an end we are legally obliged to remove the relevant profile from the database UNLESS there is other pertinent risk information attached to the profile. For example, if an individual has become a Disqualified Director because they were found guilty of fraud then their profile containing the fraud conviction will remain on the database post the disqualification period.

DELISTING FROM A LAW OR REGULATORY ENFORCEMENT LIST

Individuals remain on the World-Check database for as long as their name remains listed on the official enforcement website or its archives up to a period of 20 years from expiry of enforcement action. We will also delete an entry from the database after complete delisting/deletion from the enforcement site and its archives, unless there are other risk relevant reasons to keep the profile on the database.

DELISTING FROM A SANCTIONS LIST

Profiles remain on a database for as long as the individual or entity name remains listed on the official sanctions website or remains in the sanctions archived list or archived press release format. If official public record (including sanction archive) is no longer available, World-Check will remove the entry provided there is no other relevant risk information associated with the profile.

CHANGES IN PEP STATUS AND PEP DEFINITIONS

If an individual has left public office for many years and did not enter another office, nor is associated through close family or business relationship to another office or PEP and there is no other risk information available, their profile may be deactivated. As a guideline, we will consider

an old PEP profile for deactivation after the lapse of three election terms since vacating last office. Also, as the definition of a PEP has evolved over the years, certain individuals who were historically classified as PEPs may no longer fit international or country specific PEP definitions. These profiles will be removed from the database unless they have other pertinent risk information attached.

DUPLICATION

Because we monitor all sanction and enforcement lists, as well as negative media, from time to time there may be duplication of individual and entity profiles on the database. This will be corrected after our consolidation quality checks and the most recent duplicated profile removed.

THE FACTS WE ORIGINALLY REPORTED HAVE CHANGED

Individuals who have been investigated, accused, arrested, charged, questioned or detained may have their profile removed if these circumstances change and there is no other pertinent risk information attached to the profile. For example, charges against an individual could be dropped or the individual could be acquitted. In the case of acquittal, the profile would be deleted upon acquittal. A profile may also be removed if for more than a decade there have been no further developments on the accusations.

AGED POST-CONVICTION INFORMATION

The term 'post-conviction profiles' means profiles based on criminal convictions, civil penalties, fines and settlements, cease and desist orders for relevant crimes.

- In the case of fines and other civil penalties/orders or sentences of imprisonment of less than 30 months we will delete profiles after 10 years from conviction date
- If the sentence of imprisonment was more than 30 months we will delete after 20 years of conviction date if there is no other basis for the profile, for example continued listing on a sanctions or enforcement list

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