

## WHAT DO I TELL A CUSTOMER WHO REFUSES TO GIVE THEIR ADDRESS, OR PROPER IDENTIFICATION?

One of the easiest ways to build CIP into your processes is to consistently ask customers, politely and respectfully for the same information. Listed below is an example script that could be used in opening new accounts (when asking for identification information):



“Mr./Ms. Customer, in order to open the account, I will need to verify some basic information in order to identify you on our Company records. I will need the exact name that you would like your account titled, the street location and phone number, as well as your birth date and social security number. Also, would you be able to provide proof of identity such as a driver’s license, passport, credit card or some other form of identification? I will need two forms of identification...”

Sometimes, despite your best efforts customers will not understand or be agreeable to providing the requested identification in order to open a new account. Remember, treat every customer consistently, fairly and with respect! Refer to Appendix F for examples of negative situations you might encounter, and suggestions on how to deal with them.

**APPENDIX F  
DEALING WITH CUSTOMER OBJECTIONS - CIP**

<b>OBJECTION</b>	<b>TIPS TO OVERCOME, WHAT TO SAY TO YOUR CUSTOMER....</b>
Why must I provide identification, it was never required in the past?	Since the terrorist actions on September 11 <sup>th</sup> , every financial institution will be required to ask for identification. This is two-fold to ensure that terrorist activity does not re-occur, and to ensure that no one is stealing your identity.
Some negative information shows up on your customer's ID report (credit report, etc.) The customer insists it is not them?	Is there anything you can provide to support your claim? (Ask particular details about the negative item to get more information)
Our policy says that we must have a street address except in certain situations. My wealthy customer does not fall into one of those exceptions and yet will not give me their address. Is there anything I can do?	The USA Patriot Act and CIP do require us to have street addresses (of you and/or your business) on file. We treat these as confidential information and would be happy to flag your account for a P. O. Box, however we will need a street address.
Some negative information shows up on my customer concerning OFAC; how do I deal with this?	Call the BSA Department for dealing with the situation. It may be possible that your customer is a "false positive", and the account can be opened; however that must be researched before proceeding further. Get as much information as possible and tell the customer you will need to get further approvals before you can open the account.
Your customer has many items that fall into the Risk Level Four categories (signature does not match their ID, they don't look like the picture on their ID, they are evasive about the source of funds, etc.) What do I do?	Get as much information as possible and consult a supervisor; who may contact the Fraud Investigation Department for further instructions. Remember that you do not have to open an account. If you decide to not open the account, decline it politely and respectfully.
I have a customer who wants to open an account; he supplied all kinds of documentation (drivers license, passport, etc.), but claims not to have a SS#. He is quoting the Privacy Act of 1974 as his reason for no SS#. What do I do?	Explain that current USA Patriot Act regulations require that we obtain a SS#. He may be able to write his congressman or representative, but the bank is only complying with the law. (Also, FYI – The Privacy Act of 1974 applies to denied government benefits for lack of a SS#, not to banks. And in order to get a passport, he is required to have a SS#.)
Your customer has an existing Company account. You have determined that due to recent delinquencies, overdrafts, etc. you want to get some identification, even though the Company standards state that you would not be required to do this. The customer objects; how do you handle it?	Explain to the customer that the USA Patriot Act and CIP regulations require us to be "reasonably certain" of who we are dealing with and that you need this to complete your file and stay in compliance with the regulation. Most customers will comply.