

# BMT THE BRYN MAWR TRUST COMPANY OF DELAWARE

## New Customer Identification Program Regulatory Overview and Client Instruction Guide

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Homeland  
Security



### USA PATRIOT Act & Bank Secrecy Act

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In light of recent regulations, all financial institutions and service providers are now required by law to institute and maintain a Customer Identification Program ("CIP"). The goal of such programs is to ensure that banks and other financial service providers are vigilant to deny services to those who may wish to fund terrorist groups, launder money earned from illegal activity, or commit fraud. Failure to adhere to these regulatory guidelines can incur heavy fines and criminal penalties.

The Bryn Mawr Trust Company of Delaware (BMTD) takes these guidelines seriously, and has instituted a Customer Identification Program ("CIP") that seeks to verify the identity of each **Interested Party** of a new account and perform an adequate level of due diligence on each **Powerholder** of a trust.

BMTD understands the value our clients place on their privacy. Furthermore, BMTD recognizes that the information and documentation requested can seem invasive. In response to these concerns, BMTD has sought to design a CIP that balances the clients' need for privacy, clarity, and streamlined communication with BMTD's need to collect information, ensure regulatory compliance, and effectively administer our clients' accounts. To that end, the below documents must be obtained prior to the opening of a new account at BMTD.

You can be certain that BMTD will not share your information with anyone outside of BMTD and our parent company, The Bryn Mawr Bank Corporation (NASDAQ: BMTD). BMTD is equipped with a secure email system to encrypt sensitive communications, all physical files are maintained in locked, fire-resistant cabinets, and our digital files are securely stored on BMTD's corporate servers. Additional information regarding BMTD's privacy practices as well as our parent corporation's official privacy policy statement has been included in this packet for your reference.

If you have any questions about this process, please feel free to contact a BMTD representative directly at +1(302) 798-1790.

## **Identification Verification Documents**

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### **Interested Parties:**

BMT defines **Interested Parties** as: Any person or entity that has a current beneficial interest in an account, has the authority to move or direct the movement of funds, has the authority to manage or direct the management of the account's investments, or has the authority to name, remove, or replace other interested parties.

#### **For Trust Accounts:**

- Grantor(s)/Donor(s)/Settlor(s)
- Beneficiaries
- Investment Advisers
- Distribution Advisers
- Trust Protectors
- Other Fiduciaries

#### **For Custody Accounts or Investment Management Accounts:**

- Account Owner
- Beneficiaries
- Investment Manager
- Other Controlling Party

### **Required Documentation:**

BMT's CIP requires the following documentation for each **NEW Interested Parties**. Barring special circumstances, these documents must be obtained **PRIOR** to the establishment of a new account on BMT's system,

- Ø One Customer Information Sheet
- Ø One IRS Form W-9 (Or W-8 for Non-Resident Aliens and Foreign Parties)
- Ø One Form of Primary ID
- Ø Another Form of Primary ID or One Form of Secondary ID

Alternative documents may be accepted in certain circumstances (e.g. elderly or minor clients). Please contact your BMT Administrator to discuss these options.

### **Supplementary Documents:**

These documents are helpful in the administration of your account, but are generally not required by BMT's CIP: Family Tree depicting all beneficiaries, Gift Tax Returns if the account is being used for GST planning, Estate Plan Charts, Letter of Intent, Power of Attorney, etc.

### **Outside Accountants:**

If tax returns for the account are being prepared by an outside accountant, please inform you BMT Administrator and provide the name, responsible party, and contact information for the person and/or firm responsible for the preparation of the taxes. A letter of engagement from the firm is also appreciated.

## **Valid Forms of Identification:**

These definitions generally adhere to the standards used by the US Citizenship and Immigration Services ([www.uscis.gov](http://www.uscis.gov))

### **Primary ID** (*contains photo, description and signature of bearer*)

- U.S. Passport or U.S. Passport Card
- Permanent Resident Card
- Alien Registration Receipt Card (Form I-551)
- Foreign passport
- Employment Authorization Document
- Driver's License
- State Issued ID Card
- School ID card with a photograph
- Voter's registration card
- U.S.military card or draft record
- Military dependent's ID card
- U.S.Coast Guard MMD Card
- Native American Tribal Document
- Canadian Driver's License

### **Additional Primary ID Forms for Minors (Under 18 Years Old)**

- School record or report card
- Clinic, doctor or hospital record
- Day-care or nursery school record

### **Secondary ID**

- Auto registration - document registration number & state of issuance
- Union card or Employee ID - document employer or union and any identifying numbers
- National Credit card (must be previously signed) - only record name of card issuer and expiration date.
- Local Credit Card (must be previously signed) - only record name of card issuer and expiration date.
- Local financial institution check cashing card or local.

### **Alternate Secondary ID** (*must provide two forms*)

- Social Security Card
- Medicare Card
- Medicaid Card
- Insurance Card
- Organization Membership Card
- Voter Registration Card
- Utility Bill
- Real Estate Tax Bill
- Bank or Brokerage Statement
- State or Federal Gov't Official Mail

## **Customer Due Diligence Questionnaire**

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The Bryn Mawr Trust Company of Delaware must ask specific questions to ascertain certain details regarding the **Powerholders** of a trust, the nature of the trust's intended purpose and business practices, and the source of the assets used to fund the trust.

For the purposes of this questionnaire, a **Powerholder** of a trust is any person or business that has the authority to direct or delegate the disposition of trust assets, manage or direct the management of trust investments, or has the authority to add or remove fiduciaries of the trust.

### **Personal:**

Under the USA Patriot Act (Specifically Section 352) and the Bank Secrecy Act Guidelines, these next set of questions will help us gather information to comply with current regulatory requirements. Our bank, like all other financial institutions in the US, is required to ask these questions. These regulations require us to gather information about this account/relationship, and how you intend to use the account you are opening today. This will include questions about other parties on this account where applicable. Again, these questions are required and will help us comply with regulations. To do that, we will be documenting your responses.

### **Business:**

Under the USA Patriot Act (Specifically Section 352) and the Bank Secrecy Act Guidelines, these next set of questions will help us gather information to comply with current regulatory requirements. Our bank, like all other financial institutions in the US, is required to ask these questions. The focus of these questions is to help us better understand the activities of your business/relationship and to learn more about the clients you serve. Questions can be asked about how you intend to use the account you are opening today. That may include questions about other parties on this account. Again, these questions are required and will help us comply with regulations. To do that, we will be documenting your responses.

### **Additional Information:**

Your BMTD Trust Officer will review your response with BMTD's compliance department and may contact you if we have any follow up questions. Additionally, BMTD reserves the right to refuse service to anyone, without notice of publication of cause, for any reason prior to the formal commencement of any fiduciary duty.

# **FREQUENTLY ASKED QUESTIONS:**

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## **Why is The Bryn Mawr Trust Company Requesting this Information?:**

The USA PATRIOT Act, a Federal law, requires The Bryn Mawr Trust Company and its subsidiary, The Bryn Mawr Trust Company of Delaware (“BMT”) to maintain a Customer Identification Program (“CIP”) whereby we must obtain, verify, and record information that identifies each person or business entity involved with an account opening.

## **What This Means for You?:**

When you open an account or add a new owner to an existing account, we will require physical and/or documentary information necessary to verify the identity of all account owners, co-fiduciaries, beneficiaries, and etc. (“Interested Parties”). **A Customer Relationship will not be established until the identity of all Interested Parties is satisfactorily confirmed** and the purpose and intended nature of the business relationship is determined. If you refuse to provide any of the requested information, or if BMT cannot form a reasonable belief that we know the trust identity of the Interested Parties, the relationship cannot be established. Likewise, if requested follow-up information is not received within a reasonably allotted time, or if the information verification process reveals discrepancies between what you provided and what the verification process discloses, the relationship will be terminated.

## **What Will Be Done With Your Information?:**

Your personal and confidential information will be used to verify the identity of the Interested Parties in accordance with BMT’s CIP policy. Once the information is verified and the relationship is established, your information will be retained in BMT’s secure files and maintained in accordance with the bank’s privacy policy (attached.) BMT will not share your private or confidential information with any parties outside of BMT or its affiliates for marketing purposes.

**BMT**

# BMT THE BRYN MAWR TRUST COMPANY OF DELAWARE

## GRANTOR/CLIENT INFORMATION SHEET

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Customer Name: \* \_\_\_\_\_

Date of Birth: \* \_\_\_\_\_ TIN/SSN: \* \_\_\_\_\_

Physical Address: \* \_\_\_\_\_  
\_\_\_\_\_

Mailing Address: \_\_\_\_\_  
(If Different) \_\_\_\_\_

Home Phone: \* \_\_\_\_\_ Mobile Phone: \_\_\_\_\_

E-Mail Address: \* \_\_\_\_\_

Occupation: \* \_\_\_\_\_

Employer: \* \_\_\_\_\_

Employer Address: \_\_\_\_\_  
\_\_\_\_\_

Office Phone: \_\_\_\_\_ Fax: \_\_\_\_\_

Work Email: \_\_\_\_\_

## TAX PREPARER INFORMATION

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To be filled out if the Trust's tax returns and filings are being prepared by an outside accounting firm.

Firm Name: \_\_\_\_\_

Primary Contact: \_\_\_\_\_

Address: \_\_\_\_\_  
\_\_\_\_\_

Phone: \_\_\_\_\_ Fax: \_\_\_\_\_

Email: \_\_\_\_\_

*Items marked with an "\*" are required to meet BMT's regulatory requirements.*

# BMT THE BRYN MAWR TRUST COMPANY OF DELAWARE

## INTERESTED PARTY CONTACT INFORMATION SHEET

This form is required for each additional interested party of the Trust.

For the purposes of this form, an Interested Party means all:

- 1) Co-Fiduciaries: Investment Advisers, Distribution Advisers, Trust Protectors, Committee Members
- 2) Beneficiaries
- 3) Authorized Agents, Advisors, or Representatives

**Name: \*** \_\_\_\_\_

**Date of Birth: \*** \_\_\_\_\_ **SSN/TIN: \*** \_\_\_\_\_

**Physical Address: \*** \_\_\_\_\_

**Mailing Address:** \_\_\_\_\_  
*(If Different)*

**Home Phone: \*** \_\_\_\_\_ **Cell:** \_\_\_\_\_

**E-Mail Address: \*** \_\_\_\_\_

**Occupation: \*** \_\_\_\_\_  
*(If Applicable)*

**Employer: \*** \_\_\_\_\_  
*(If Applicable)*

**Employer Address:** \_\_\_\_\_

**Office Phone:** \_\_\_\_\_ **Fax:** \_\_\_\_\_

**Work Email:** \_\_\_\_\_

*Items marked with an "\*" are required to meet BMT's regulatory requirements.*