CUSTOMER GUIDE

# KYC & document requirements

A clear guide to identity, address and business checks for virtual office customers

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BROMLEY VIRTUAL HUB

## IDENTITY. ADDRESS. BUSINESS.

Straightforward checks. Clear next steps.

For Bromley and Sevenoaks Virtual Hub customers

**Bromley Virtual Hub Ltd**

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# Before your service can start

Bromley Virtual Hub Ltd offers registered-office, business-address, correspondence-address and mail-handling services. Those services for companies, partnerships and other legal persons fall within the UK's anti-money laundering framework for trust or company service providers.

We also apply proportionate identity, address and risk checks to sole traders and other customers under our fraud-prevention, security and risk-management procedures.

Before activation, we need to understand who the customer is, who owns or controls the business where applicable, and how our address will be used.

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| **Please wait for activation** | Do not use or advertise your Virtual Hub address until we confirm in writing that your account is active. Mail arriving before activation may be rejected or returned to the sender. |

## Your setup at a glance

**1**

### Tell us about you and the business

Give us accurate personal and intended-use information, plus company details where a company already exists. We use this together with reliable public records to identify any people who own or control the business.

**2**

### Verify identity and home address

Complete the secure online identity check and upload suitable current-address evidence.

**3**

### We verify the business and ownership

For a straightforward UK company, we normally use Companies House and other reliable public sources. We only ask you for supporting evidence if records are unavailable, incomplete, inconsistent or the structure needs clarification.

**4**

### We assess and confirm

We review the evidence, complete risk-based checks and contact you if anything is missing or inconsistent.

**5**

### Activate before using the address

We send written confirmation when the service is ready to use.

# Who we need to check

The exact people depend on the customer's legal form and ownership. We normally verify the following.

## Why we ask

Customer due diligence helps prevent misuse of business addresses for fraud, money laundering, terrorist financing and proliferation financing. It also protects legitimate customers and the integrity of our address. Checks may include reliable independent data, Companies House or overseas registers, sanctions and politically exposed person screening, and ongoing monitoring.

### The customer

The individual, company, partnership, trust, charity or other organisation entering into the service.

### Directors and managers

As part of our onboarding policy, we normally verify the identity of all company directors. We also identify relevant senior managers or equivalent office-holders where required by the customer's structure or our risk assessment.

### Beneficial owners and controllers

Every individual who ultimately owns or controls more than 25% of shares or voting rights, and anyone who otherwise exercises ultimate control.

### People acting for the customer

The account holder, authorised users, representatives and anyone giving instructions or collecting mail on the customer's behalf.

### Sole traders & new ventures

If you are a sole trader or have not yet incorporated, there may be no company ownership structure to verify. We normally verify your identity and home address and ask about your intended trading name, activity and use of our address.
These are Bromley Virtual Hub Ltd onboarding, fraud-prevention and risk-management checks.
Tell us if you later incorporate, add a partner or materially change the business.

# What we collect or verify

The information needed depends on whether you are applying as an individual, sole trader, company, partnership, trust or another organisation. We obtain reliable public information ourselves where possible and ask you only for what is needed to complete or clarify the picture.

## About the business

- Registered and trading names, legal form, registration number, registered jurisdiction and principal place of business.
- Nature of the business, expected activity, countries of operation, principal customers or suppliers where relevant, and why you need your Virtual Hub address.
- Current directors, PSCs and ownership or control details. For straightforward UK companies, we normally confirm these through Companies House and other reliable public sources rather than asking you to upload ownership documents.
- Names and roles of directors, partners, trustees, settlors, beneficiaries, senior managers and authorised representatives, as applicable. We obtain these from public records where reliable information is available and ask you only where confirmation or clarification is needed.
- Regulator or AML supervisor details if the customer carries on a regulated activity.
- Expected mail volumes, company names that will use the address, payment method and any third party involved in paying or instructing us.

## Information about each person

- Full legal name, former names, date of birth, nationality, residential address and contact details.
- Role and authority to act, plus an explanation and evidence for any difference between identity records, address records and registry information.

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| **Keep us updated** | Tell us promptly if your address, directors, ownership, control, business activity, authorised users or use of our service changes. |

# Personal identity & address evidence

Upload complete, legible colour images or original digital statements through the secure route we provide. Documents must belong to the person being checked and show consistent details.

## Proof of identity - provide one accepted photo ID

- Valid passport or Irish passport card.
- UK, Channel Islands, Isle of Man or EU photocard driving licence, full or provisional, where accepted by the verification route.
- Biometric national identity card, biometric residence document, government-issued photographic visa or permit, or another government photo ID we confirm is acceptable.
- A supported eVisa or other digital immigration credential, where our verification process can validate it.

## Proof of current residential address - recency depends on the document type

Evidence must show your current residential address. The acceptable age of the document depends on the type of evidence. Bank statements, credit-card statements and utility bills will normally need to be dated within the previous 3 months. Documents designed to cover a longer period, such as a current council tax statement, tenancy agreement or annual mortgage documentation, may remain acceptable for longer.

| Usually accepted | May be accepted after review |
|---|---|
| • Bank, building society, credit union or credit-card statement<br>• Gas, electricity, water, landline or fixed broadband bill<br>• Current council tax statement<br>• Mortgage statement | • Current signed tenancy or social-housing agreement<br>• HMRC or other government tax correspondence<br>• Government benefits or pension correspondence<br>• Current-address insurance policy or solicitor's completion letter |

# Document quality & alternatives

Clear, complete evidence helps us verify your application without avoidable delays.

## Document quality rules

- Show every edge and page, with no glare, blur, redaction, cropping or alteration.
- The document must be current and not cancelled, replaced or reported lost or stolen. Expired documents are accepted only where the verification standard expressly allows it.
- Address evidence must show the person's full name, current home address, issuer and issue or statement date. Mobile-phone bills and informal correspondence are not normally accepted.
- Use separate evidence for identity and address unless we expressly confirm otherwise.
- Screenshots are not normally accepted. Downloaded statements should be original PDFs showing the issuer's branding and document details.

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| **Different documents may be needed** | The secure verification journey shows the exact list for your route and country. If standard evidence is unavailable, contact us before submitting alternatives. |

# Online checks, selfies & certification

## How online verification works

We may use identity-document validation, electronic data sources and a live selfie or short liveness check. The process compares you with the image on your identity document and checks whether the document and identity appear genuine. A failed automated result does not automatically mean fraud; our team may request a new image, alternative evidence or a manual review.

Electronic tools may support our identity checks. Where we rely on a digital verification service to verify a natural person's identity for AML customer due diligence, we only treat it as the independent verification source where it meets the applicable UK requirements, including certification against the UK Digital Identity and Attributes Trust Framework and inclusion on the GOV.UK DVS Register.

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| **Use your own device** | Complete the check yourself in good light. Do not send identity documents by ordinary email or through a public contact form unless our team has specifically provided an approved secure route. |

## When certification may be required

We may require certified copies when an electronic check is unavailable or inconclusive, for overseas or higher-risk cases, or where the issuing source cannot be independently verified. Certification confirms that a copy matches an original; it does not by itself guarantee acceptance.

An acceptable certifier will usually be independent and professionally accountable, such as:

- a solicitor, barrister, notary public, regulated accountant, bank or building-society official;
- a consular or embassy official, or another regulated professional we approve in advance.

### The certifier should see the original and write on the copy:

- “I certify that this is a true copy of the original seen by me” and, for photo ID, “and a true likeness of the person”;
- their signature and certification date; full name; professional capacity; regulator, membership or registration number where applicable; and work address, phone number or email.

The certifier must not be the applicant, a relative or partner, someone living at the same address, or anyone with a conflict of interest. Certification and translation requirements vary by country and risk. We may ask for a certified English translation, verification directly with the certifier, or other authentication.

# Beneficial ownership & control

We must look through the ownership and control structure until we reach the individual people who ultimately own or control the customer. Companies House information is an important source, but we cannot rely on the PSC register alone to verify beneficial ownership. We may obtain additional information or evidence from you and/or other reliable independent sources.

## Who counts as a beneficial owner or controller?

- An individual who directly or indirectly owns or controls more than 25% of the shares or voting rights.
- An individual who can appoint or remove a majority of the board.
- An individual who otherwise exercises ultimate control, significant influence or control, even with 25% or less.
- For partnerships and trusts, the relevant partners, settlors, trustees, beneficiaries or classes of beneficiaries, protectors and anyone exercising ultimate control, as applicable.

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| **Important threshold** | Exactly 25% is not automatically above the statutory ownership threshold. However, a person at or below 25% may still need to be identified because of voting arrangements, appointment rights, influence, control or our risk assessment. |

## Evidence we may request when public records are not enough

- A dated ownership chart showing every layer, percentage and country, signed by a director or authorised professional.
- Current register of members, shareholder register, partnership agreement, trust deed or equivalent.
- Recent official registry extract or certificate of incumbency, and constitutional documents where ownership or control is not clear.
- Evidence for nominees, trusts, foundations, bearer-share history or other arrangements that obscure the natural persons behind the customer.

# Ownership examples

## Simple ownership

| Your Business Ltd | Owner A<br>50% | Owner B<br>30% | Owner C<br>20% |
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| Customer | KYC required | KYC required | Not solely because of ownership; control and risk must still be assessed |

## Layered ownership

Where another company owns the customer, we continue through each layer until we identify the relevant natural persons. Ownership percentages, voting rights, majority control and other forms of influence or control must all be considered.

| Your Business Ltd | Holding Co | Priya |
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| Customer company | Owns 80% of Your Business Ltd | Priya owns 60% of Holding Co, which owns 80% of Your Business Ltd. She therefore has indirect ownership/control through the chain and must be assessed as a beneficial owner. Her economic interest is 48%, but percentage calculations are only part of the assessment. |

# Overseas & complex structures

## Overseas organisations

We do not rely on a fixed country-by-country document table because registries, access and evidential standards change. We normally ask for the most authoritative, current source available in the place of incorporation.

- Official company or partnership registry extract showing current status, officers, registered office and ownership where available.
- Constitution, articles, membership or shareholder register, partnership agreement, trust instrument or certificate of incumbency where the registry does not show the full position.
- A clear ownership chart and identity/address evidence for each relevant natural person.
- Certified English translations where evidence is not in English.
- Evidence of operating address, business activity, licence or regulator, and source of funds or wealth where risk requires it.

## Higher-risk and complex cases

We apply enhanced due diligence where required by law or where our risk assessment identifies a higher level of risk. This includes circumstances where the Regulations require enhanced due diligence because a customer or relevant transaction involves a person established in a FATF Call for Action country. Other countries or geographic connections may also present increased risk and require enhanced checks under our risk assessment.

Enhanced checks may also be appropriate for unusual or opaque structures, unexplained intermediaries, sanctions concerns, high-risk industries, adverse information, or activity that does not fit the stated purpose.

Politically exposed persons (PEPs), their family members and known close associates require enhanced due diligence. The measures applied are proportionate to the assessed risk. UK domestic PEPs are treated as lower risk at the starting point unless additional risk factors indicate otherwise.

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| **No automatic overseas rule** | Living or incorporating outside the UK does not automatically mean documents must always be certified. We decide the appropriate safeguards case by case, and may require certification, translation or extra independent verification. |

# Review, monitoring & decisions

## What we check

- Identity, address, authority to act, company status, ownership and control.
- Whether the intended use of the service is commercially coherent and consistent with your profile.
- UK sanctions exposure, including ownership or control by a designated person, and relevant PEP and adverse-information risks.
- Whether information supplied matches Companies House, the Trust Registration Service or other reliable registers. Material discrepancies may need to be queried or reported.

## Ongoing monitoring

KYC is not a one-off exercise. We may refresh documents, repeat screening, review activity and ask for updated information during the relationship. You must not allow another person or unapproved business to use, share or 'sub-let' the address. Every trading or company name using the service must be approved in advance.

## Possible outcomes

### Approved

Your service is activated in writing. Use the address only for the approved customer, names and purposes.

### More information needed

We ask a focused question or request replacement, certified or additional evidence.

### Unable to proceed

We may refuse, suspend or end service where checks cannot be completed or risk is outside our appetite.

## Companies House verification is separate

A Companies House personal code, or identity verification completed elsewhere, does not automatically complete the AML/KYC checks required for your Virtual Hub address service. Conversely, ordinary AML/KYC checks do not necessarily meet the Companies House identity verification standard. Where Bromley Virtual Hub Ltd verifies an identity in its capacity as a Companies House Authorised Corporate Service Provider (ACSP), we explain the separate evidence and verification requirements.

# Privacy, records & help

## How we use your information

We use personal and business information to provide the service, verify identity and address, understand ownership and control, prevent fraud, meet legal and regulatory duties, keep our services secure and manage risk. Verification may involve specialist identity, fraud-prevention and screening providers, public registers and competent authorities. Where biometric or liveness technology is used, the applicable privacy information will explain the processing.

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| **Legal restrictions** | We may be legally restricted from explaining certain checks, delays, reports or decisions. Nothing in this guide requires us to disclose information where doing so would be unlawful. |

## How long records are kept

- AML customer due diligence records are normally retained for five years after the business relationship ends. At the end of that period, personal data is deleted unless a legal exception permits or requires us to retain it for longer.
- Where Bromley Virtual Hub Ltd verifies an individual for Companies House as an Authorised Corporate Service Provider (ACSP), the identity-verification evidence and required records are retained for seven years from completion of the identity check, in accordance with Companies House requirements.
- Other records may be kept for different periods where another legal, contractual or dispute-related reason applies.

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| **Protect your information** | Upload evidence only through the secure process we provide. If you receive an unexpected request for documents, contact us using the details below before responding. |

## Need help with your documents?

Bromley Virtual Hub Ltd
12 Farwig Lane, Bromley, BR1 3RB
Phone: +44 (0)20 8040 2649
Websites: bromleyvirtualhub.co.uk | sevenoaksvirtualhub.co.uk

# Official references

## About this guide

This customer guide summarises Bromley Virtual Hub Ltd's usual requirements and is not legal advice or a complete statement of our internal AML policies. Requirements can change when law, official guidance, technology or risk changes. The latest secure onboarding instructions take priority for the documents and steps needed in a particular application.

Prepared against public UK guidance available on 17 September 2026. These references are included for transparency; customers do not need to read them to complete onboarding.


1. HM Revenue & Customs, Anti-money laundering guidance for supervised businesses (published 8 July 2026; updated 16 July 2026). This is the primary current HMRC source covering CDD, verification, electronic checks, EDD, PEPs, high-risk jurisdictions, record keeping and TCSPs.
gov.uk/hmrc-internal-manuals/anti-money-laundering-guidance-for-supervised-businesses

2. The Money Laundering and Terrorist Financing (Amendment) Regulations 2026 (SI 2026/621), which came into force on 30 June 2026.
legislation.gov.uk/uksi/2026/621/contents/made

3. HM Revenue & Customs, Trust or Company Service Provider guidance for money laundering supervision (updated 19 November 2025).
gov.uk/government/publications/anti-money-laundering-guidance-for-trust-or-company-service-providers

4. HM Revenue & Customs, Your responsibilities under money laundering supervision (updated 23 May 2025), including customer due diligence and five-year AML record keeping.
gov.uk/guidance/money-laundering-regulations-your-responsibilities

5. HM Revenue & Customs, TCSP sector risk assessment (AMLG3500), within the 2026 Anti-money laundering guidance for supervised businesses. This is the current HMRC sector-risk reference for Trust or Company Service Providers.
gov.uk/hmrc-internal-manuals/anti-money-laundering-guidance-for-supervised-businesses/amlg3500

6. The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017, including the definition of beneficial owner and the 'more than 25%' threshold.
legislation.gov.uk/uksi/2017/692/contents

7. Companies House, People with significant control (PSCs), including ownership, voting, appointment and significant influence or control conditions.
gov.uk/guidance/people-with-significant-control-pscs

8. Companies House, How to meet the Companies House identity verification standard (updated 19 June 2026), including accepted evidence, remote checks and seven-year record keeping for an Authorised Corporate Service Provider (ACSP).
gov.uk/guidance/how-to-meet-companies-house-identity-verification-standard

9. HM Treasury and Department for Science, Innovation & Technology, Using digital identities with the Money Laundering Regulations (26 February 2026).
gov.uk/government/publications/using-digital-identities-with-the-money-laundering-regulations

10. UK Government, Starter guide to UK sanctions, including screening and ownership/control considerations.
gov.uk/guidance/starter-guide-to-uk-sanctions


| Document owner | Bromley Virtual Hub Ltd \| Version 1.5 \| Review after any material legal or process change, and at least annually. |
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