

LSEG World-Check

Record Deletions Criteria

We periodically remove World-Check records, or remove details

from records, 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
- qualifying status changes of State Owned or Invested Enterprises
- a record has been duplicated
- a change to the circumstances that we originally reported
- aged post-conviction information

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

Disqualified Directors

As a matter of course, we create records on 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 record from the database UNLESS there is other pertinent risk information attached to the record. For example, if an individual has become a Disqualified Director because they were found guilty of fraud then their record containing the fraud conviction will remain on the database post the disqualification period.

Delisting from a law or regulatory enforcement list

Individuals and entities 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 date of listing or date of last update. 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 record on the database.

Delisting from a sanctions list

Primary sanctions and associated narrative sanction records

remain on the database for as long as the primary sanctioned individual or entity name remains listed on the official sanctions website or remains in the sanctions archived list or archived press release format. If however, sanctions were lifted against an individual or entity by all sanctioning bodies the record and its associated records will be deleted after 20 years from complete delisting from active sanctions lists even when the name remains in sanctions archives. If official public record (including sanction archive) is no longer available, World-Check will remove the entry or associated entries. All of the aforesaid deletions will only take place provided there is no other relevant risk information associated with the primary or narrative sanctions record.

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 record may be deactivated. As a guideline, we will consider an old PEP record for deactivation 10 years after they vacated last office, as well as any family member or close associate that solely derives his or her PEP status from such deactivated primary PEP. 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 records will be removed from the database unless they have other pertinent risk information attached.

State Owned or Invested Enterprises

State Owned Enterprises (SOE's) and State Invested Enterprises (SIEs) remain on the World-Check database for as long as it is respectively more than 50% or 10% state owned. If state ownership is terminated (e.g. complete privatization) or state investment falls below 10% the SOE or SIE record will be deactivated after 10 years have expired from date of privatization or reduced ownership.

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 records on the database. This will be corrected after our consolidation quality checks and the most recent duplicated record removed.



The facts we originally reported have changed

Individuals who have been investigated, accused, arrested, charged, questioned or detained may have their record removed if these circumstances change and there is no other pertinent risk information attached to the record. For example, charges against an individual could be dropped or the individual could be acquitted. In the case of an acquittal, the record would be deleted upon acquittal. A record may also be removed if after 7 years there have been no further developments on the pre-conviction accusations or in the case of terror related accusations, 10 years have expired with no further developments/risk information reported.

Aged post-conviction information

The term "post conviction record" means records 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 48 months we will delete records after 10 years from conviction date
- If the sentence of imprisonment was more than 48 months we will delete after 20 years of conviction date if there is no other basis for the record, for example continued listing on a sanctions or enforcement list

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