



Notice of Automated & Autonomous Systems Operations

AXICORP FINANCIAL SERVICES PTY LTD (DIFC Branch)

Ref No: F003742

Notice of Automated & Autonomous Systems Operations

This AI Transparency Notice is provided in accordance with Regulation 10 of the DIFC Data Protection Regulations (“DIFC DPR”) in relation to the use of Regulatory DataCorp (“RDC”) / Moody's Compliance Screening Platform) (the “System”) by AxiCorp Financial Services Pty. Ltd. (“Firm”).

This notice is intended to provide a comprehensive, true, and plain description of how Personal Data is Processed by the System, the purposes of such Processing, the design principles governing the System, and the safeguards in place to ensure compliance with DIFC Data Protection Law (DIFC Law No. 5 of 2020) (“DIFC DPL”).

Capitalised terms used in this Notice have the meanings given to them under the DIFC DPL and the DIFC DPR.

The Processing of Personal Data by the AI System does not impact the exercise of your rights under the DIFC DPL. We have implemented appropriate measures to honor your rights. You may refer to our [Privacy Notice](#) for details of the rights available to you.

Intended Purposes of the AI System

The System operates within human-defined purposes only, cannot independently define or expand its purposes, and does not make automated decisions that produce legal or similarly significant effects on individuals without human review and intervention

The AI System is used as part of the Firm's customer onboarding, customer due diligence and ongoing monitoring processes. The System supports sanctions, PEP, adverse media and watchlist screening and assists in the identification and assessment of financial crime, money laundering, terrorist financing, sanctions and reputational risks. It analyses and prioritises potential screening matches to support compliance assessments and is operated to assist the Firm in meeting its legal, regulatory, governance, risk management and anti-money laundering (“AML”) and counter-terrorist financing (“CTF”) obligations.

Defined Principles or Limits of the AI System

The AI Systems we operate have been developed by providers in accordance with industry standards and where possible, configured by us to ensure compliance with DIFC DPL and Regulation 10. Where we have not built the Systems, we apply strict governance and oversight to their use. Our AI Systems operate within fixed settings and defined limits, and the behaviour is designed to be consistent and predictable.

We ensure that the following principles are embedded into the AI Systems we use:

- AI Systems do not have authority to independently define, approve, or implement new or incompatible purposes for Processing Personal Data
- AI Systems are restricted to Processing only Personal Data that is authorised, relevant, and proportionate to their defined purpose
- AI Systems do not automatically share Personal Data with any third parties or government authorities, upon their request
- Systems are not authorised to take decisions that produce legal effects or similarly significant impacts on individuals without appropriate human involvement
- AI Systems operate within an established governance framework that monitors and prevents misuse, bias, drift, or function creep
- Personal Data is encrypted in transit and at rest, and is subject to strict access controls
- AI Systems apply data minimisation principles and adhere to retention limits aligned with legal requirements, where possible

Output Produced by the Systems we Use

The AI System generates screening results that identify potential matches against sanctions lists, politically exposed person (PEP) databases, watchlists, adverse media sources and other risk intelligence databases. It produces risk indicators, alerts and match scores to assist Compliance personnel in assessing potential financial crime risks and prioritises screening results to help reduce false positives and improve the efficiency of compliance reviews.

The System may also generate structured summaries of adverse media, public records and other risk-relevant information relating to individuals or entities and supports ongoing monitoring by identifying changes to sanctions status, PEP status, adverse media coverage and other relevant risk factors.

These outputs are used solely to support the human-defined purposes described above. Outputs are reviewed, interpreted, and acted upon by trained personnel or integrated into business processes under human oversight. The outputs generated by the AI Systems we use do not result in legally binding or materially significant decisions without appropriate human involvement, review, or validation where required by law. In some cases, where an AI output falls within pre-approved low-risk thresholds, the application may progress without individual manual review. Applications that fall outside these thresholds or trigger an alert are routed for human assessment.

AI System Design and Governance Principles

Any AI System developed and utilised within our products, services, or other use cases is designed and operated in accordance with the following AI principles of design, as required under the DIFC DPR:

- **Ethical and Fair Use:** Systems are designed to promote ethical outcomes and to treat individuals fairly. We take reasonable steps to identify and mitigate potential bias that could lead to unfair or discriminatory outcomes.
- **Transparency:** Where AI is used to Process Personal Data, we aim to ensure that such Processing is explainable in clear, non-technical terms to data subjects.
- **Security:** Appropriate technical and organisational measures are in place to protect Personal Data processed by AI Systems and to prevent unauthorised access or a Personal Data Breaches.
- **Accountability:** We maintain oversight and governance measures to ensure responsibility for the development, deployment, and outcomes of our AI Systems.

Codes and Regulatory Standards

Our AI Systems are designed, developed, selected, or operated having regard to relevant national and international standards and principles, such as the EU Artificial Intelligence Act and such other codes, certifications, or principles established or designated by national or international regulatory authorities or bodies as may be applicable from time to time.

We monitor updates to these frameworks and any additional codes or certifications designated by the DIFC Commissioner and adapt our governance accordingly.

Ongoing Review

This AI Transparency Notice is reviewed periodically and updated as necessary to reflect changes in AI Systems, regulatory expectations, or organisational practices.

You may contact the Firm at the contact details mentioned below for further information about the use of AI Systems and the Processing of Personal Data, or to exercise your rights under the DIFC DPL.

privacy@axi.com