## **Oracle Financial Services Customer Screening**

Oracle Financial Services Customer Screening Matching Guide

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## **Chapter 1: Introduction**

Oracle Financial Services Customer Screening provides a flexible and customizable strategy for matching customer records to watch list records. **Sanctions screening** typically requires the business to employ tightly-defined, zero tolerance matching policies which will identify every possible match against a sanctions list. In these cases, the additional review work of lower probability matches will be necessary. By contrast, a business carrying out **PEP screening** may choose a strategy of finding and investigating only the most likely matches against the PEP list, and the additional work required to confirm or eliminate weaker matches may not be cost effective for the business.

Oracle Financial Services Customer Screening therefore employs a range of clustering strategies and matching rules. These can be enabled and disabled as needed, to tune the behavior of Oracle Financial Services Customer Screening to your requirements.

The matching rules are built around name matching. Other identifiers are also used in the matching rules, but their main purpose is to rank matches by strength, and thereby to enable a most-likely approach to reviewing potential matches. Oracle Financial Services Customer Screening also includes an evaluation of the risk posed by the potential match, allowing both strength of match and risk profile to be used in prioritizing reviews. For example, strong matches to Sanctions lists should be regarded as the most urgent matches, requiring immediate attention. Strong matches to PEP records will require follow-up, but may not be so urgent. Looser matches to PEP records may not be worth the time and operational cost of review.

In general, the looser the match rule, the more likely it is to raise false positives. It is not possible to eliminate all false positives, especially if there is a requirement to identify **all** true matches. Tuning the matching strategy is therefore a trade-off between the proportion of true matches which are not detected and the work required to manually eliminate false positives. This will be evident in the examples in this document.

## 1.1 General matching strategy

This section provides a brief description of the general strategy used in Oracle Financial Services Customer Screening. It consists of three main components: identifier preparation, clustering and matching.

#### 1.1.1 Identifier preparation

There are some differences between the structure of data sets that always need to be normalized before clustering and matching, so that the matching process does not need to repeat the configuration of transformations on each comparison.

Identifier preparation is used to ensure that the records conform to a pre-defined data structure which can be used by the rest of the matching process, and also to eliminate common forms of variance between the records (such as spelling variants of given names and abbreviations of frequently-used tokens).

## 1.1.2 Clustering

Clustering is used to minimize the work that must be performed by the final stage of matching. It works by splitting the working and reference data into wide tranches (clusters),

based on similarities in significant data fields. Only subsets of the data which share similar characteristics, and will therefore be placed in the same cluster, will be compared on a record-by-record basis later in the matching process.

If very wide clusters are used, there will be a large number of records in each cluster. This means that there is a reduced risk that true matches will be missed, but also that a greater amount of processing power is required to compare all the clustered records by brute force. A tighter clustering strategy will result in smaller clusters, with fewer records per cluster. This results in reduced processing requirements for row-by-row comparisons, but increases the likelihood that some true matches will not be detected.

### 1.1.3 Matching

Once the working and watch list records have been divided into clusters, the rows within each cluster are compared to one another according to the match rules defined for the matching processor. Each match rule defines a set of criteria, specified as comparisons, that the pair of records must satisfy in order to qualify as a match under that rule. The match rule also defines a decision to be applied to any records which satisfy the conditions of the rule. The majority of rules have a **Review** decision, meaning matches that hit the rule need to be reviewed. However, there are also elimination rules, where if the records being compared meet the rule's criteria, a **No Match** decision is reached and the two records will not be considered a match.

**Note**: Oracle Financial Services Customer Screening does not use the **Match** decision as it never considers there to be an automatic match between two records that does not require review.

The rules are applied as a decision table, so if a pair of records qualifies as a match under a rule higher in the table, it will not be compared using any rules below that. All rules are configured to operate on a case-insensitive basis. Unless stated otherwise, all noise and whitespace characters are removed or normalized before matching.

# **1.2** Configuring Oracle Financial Services Customer Screening for different scenarios

As previously mentioned, Oracle Financial Services Customer Screening includes clusters and matching rules that are suited to various screening requirements. Tuning Oracle Financial Services Customer Screening to match your policies should be undertaken carefully and under the supervision of a risk and compliance expert, with knowledge of your business requirements and the relevant legislation.

The following general points may be useful when tuning the behavior of Oracle Financial Services Customer Screening:

• Some organizations use a zero-tolerance policy for individual name matches. Such a policy typically requires that all potential name matches must be manually reviewed, irrespective of the rest of the data associated with the record. If such a policy is in place, you should consider the following actions:

- Disable all the elimination rules in the individual matching processors. If these rules are enabled, you run the risk of preventing close name matches from being detected by the remaining match rules.
- Enable the conflicti rules in the individual matching processors. These rules allow you to detect and manually review close name matches whose supporting information conflicts with the watch list records.
- If name only clusters are enabled, the Name and Country and Name and YOB clusters are redundant and therefore can be disabled for PEP and EDD screening. They are disabled by default for Sanctions screening.
- Country prohibition screening is enabled by default for Sanctions screening. To screen for prohibited countries during PEP and EDD screening, enable the relevant country prohibition clusters and match rules:
  - The clusters used for country prohibitions in entity screening are the Registration Country cluster and the Operating Country cluster.
  - The match rules used for country prohibitions in entity screening are the Country Prohibition – Registration Country and the Country Prohibition – Operating Country match rules.
  - The clusters used for country prohibitions in individual screening are the Nationality Prohibition and the Residency Prohibition clusters.
  - The match rules used for country prohibitions in individual screening are the Country Prohibition – Nationality and the Country Prohibition – Residency match rules.
- In general, using a loose clustering strategy will result in relatively few clusters, each containing many records. This reduces the potential for missing true matches, and increases the chance of false positives. It is also expensive in terms of processing requirements, as every record in the cluster must be directly compared with every other record in that cluster.
- Conversely, a tight clustering strategy will result in a relatively large number of clusters, each containing fewer records. This increases the potential for missing true matches, and decreases the chance of false positives. It also reduces the overall cost of the processing requirements, as relatively few direct comparisons are required.

-

The conflict rules raise possible matches when the individual name appears to match a given watch list record, but the supporting data (such as date of birth or nationality) is in conflict.

## **Chapter 2: Individual matching**

This section details the default configuration when matching individuals to Sanctions, PEP and EDD lists.

## 2.1 Identifier preparation

The following identifiers are prepared for use in the individual matching process:

Identifier Description	Standard prepared attribute name	Summary of preparation logic
Given Names	dnGivenNames	A space-separated list of the first and middle names of the individual, after normalization (see the name normalization section, below).
Family Name	dnFamilyName	A normalized version of the family name (see the name normalization section, below).
Full Name	dnFullName	A concatenation of the given names and family name, separated using spaces.
Original Script Name	dnOriginalScriptName	A whitespace normalized version of the original script name.
City	dnCity	A pipe-separated list of cities associated with the individual data.
Country Code	A space separated, de-duplicated and sorted superset of all country codes provided in dnAddressCountryCode, dnResidencyCountryCode, dnNationalityCountryCodes and dnCountryOfBirthCode.	A space separated list of standard 2-character country codes.
Date of Birth	dnDOB	A date attribute containing the date of birth of the individual.
Year of Birth	dnYOB	A string attribute containing a space-separated list of possible years of birth, in a four-digit format.

The following sections describe the data preparation strategy for each of these identifiers.

#### 2.1.1 Name normalization

The name identifiers map to the prepared attributes dnGivenNames, dnFamilyName and dnFullName. In all these fields, the following transformations are applied before matching:

- 1. Standardization of accented characters.
- 2. Replacement of non-alpha (A-Z or a-z) characters with spaces.

**Note**: If matching data in the original language against original script names in watch lists, the appropriate character ranges should be removed from the Name Noise Characters Reference Data so that they are not replaced. If transliterating data before matching, transliteration must be done before name normalization.

3. Normalization of whitespace.

#### 4. Conversion to upper case.

Note that the purpose of these transformations is not to create the most 'correct' name. For example, hyphens may be used in names in a number of ways, such as in a double-barreled surname, or as an alternative for a space when a surname has a qualifier (common in the World-Check data file).

In the former case, one might ideally want to preserve the hyphen, and in the latter case replace it with a space. In general, however, additional spaces in names will not cause names to miss matching, whereas different characters could.

## **Examples**

Input data		Identifiers		
Forename	Surname	dnGivenNames	dnFamilyName	dnFullName
Carmelo	Raschellà	CARMELO	RASCHELLA	CARMELO RASCHELLA
Darwen	MANN`A	DARWEN	MANN A	DARWEN MANN A
Badr bin Saud bin	AL-BUSAIDI	BADR BIN SAUD BIN	AL BUSAIDI	BADR BIN SAUD BIN HARIB
Harib		HARIB		AL BUSAIDI
A. Arnaldo G.	TAVEIRA	A ARNALDO G	TAVEIRA	A ARNALDO G TAVEIRA
Jose Mardônio DA		JOSE MARDONIO	DA COSTA	JOSE MARDONIO DA COSTA
	COSTA**			

## 2.1.2 City and country identifiers

City and country values are derived from the source data wherever possible. There may be multiple possible cities or countries associated with an individual, perhaps because an individual resides in more than one country, has dual nationality, or resides in a different country from his/her nationality.

Country values are prepared as a space-separated list of two-character country codes in the dnAllCountryCodes attribute.

City values (which may contain spaces, for example, 'New York') are prepared as a pipe-separated list of cities in the dnCity attribute.

#### 2.1.3 Date of birth and Year of birth identifiers

A formal Date attribute holds the date of birth, where known. The year of birth is stored as a string, and is either derived from the date of birth, or may be derived from other data. The year of birth may include several possible years. This is most likely to occur when a reference source lists the age of individuals as of a given date, which may lead to two possible years of birth.

For example, if an individual is listed as 27 years old on 01/05/2007, the year of birth may be 1980 (if born before 1st May), or 1979 (if born after 1st May). In this case, both possible years are derived and added to a list of possible years of birth. The year of birth comparison in matching looks for a common year of birth between the two records being compared.

## 2.2 Clustering

Oracle Financial Services Customer Screening provides eleven clusters for matching individuals to watch lists during Sanctions screening, and nine clusters for PEP and EDD screening:

Cluster Method	SAN	PEP	EDD
Family Name	Υ	N	N
Full Name Metaphone	Υ	N	N
Given Names	Υ	N	N
Full Name Trim	Υ	N	N
Nationality Prohibition	Υ	N/A	N/A
Residency Prohibition	Υ	N/A	N/A
Name and Country	N	Υ	Υ
Name and YoB	N	Υ	Υ
First and Last Name	N	Υ	Υ
Original Script Name	N	N	N
First Initial Last Name	N	N	N

**Note**: This table shows the default configuration of both Batch and Real-Time screening processes, but these may be customized independently of one another.

The data used to create the clusters is created before matching by the preparation process. In all cases, the clusters use the prepared and normalized name attributes  ${\tt dnGivenNames}$ ,  ${\tt dnFamilyName}$ ,  ${\tt dnFullName}$  and  ${\tt dnOriginalScriptName}$ . For further information see  $\underline{2.1.1:}$  Name normalization.

## 2.2.1 Family Name Cluster (dnClusterFamilyName)

The **Family Name** cluster provides a backup to the full name clusters. This is especially important where the given name data is incomplete, making it difficult to form a complete cluster key for two names. For example, the following three example records do not share any Full Name cluster keys, due to the initials in the second record and the spacing and spelling variations seen throughout:

dnFullName	Name tokens and trimmed values		Cluster Keys	dnClusterFullNameTrim
STEPHEN JEQE	JEQE	JEQ	JEQNKO JEQSTE	JEQNKO JEQSTE NKOSTE
NKOMO	NKOMO	NKO	NKOSTE	
	STEPHEN	STE		
S J NKOMO	S	S	NKO	NKO
	NKOMO	NKO		
	J	J		
STEPHEN JEKE N	JEKE	JEK	JEKKOM JEKSTE	JEKKOM JEKSTE KOMSTE
КОМО	комо	КОМ	KOMSTE	
	N	N		
	STEPHEN	STE		

Clustering only on the family name circumvents this issue, but results in large clusters and a concomitant increase in the processing required to cross-check all the records.

The **Family Name** cluster builder counters spacing and punctuation differences by generating Metaphone keys for all tokens of the family name, AND the whole of the family name after all white space is trimmed. This is to ensure that family names such as those in the last two records in the example table below are all clustered together despite the spacing differences.

- 1. Trim all white space from the normalized family name
- 2. Apply the **Metaphone** transformation to the result, outputting a key with a length of up to 4 characters
- 3. Strip common name qualifiers from the normalized family name, e.g. Abd, Al.
- 4. Split the family name into several name tokens, using a space delimiter.

**Note:** Many other punctuation and noise characters are normalized to spaces before generating the cluster. For further information see 2.1.1 : Name normalization.

- 5. Apply the **Metaphone** transformation to each name token, outputting a key with a length of up to 4 characters. If there were no tokens remaining after stripping common name qualifiers then apply the Metaphone transformation to the each name token of the original normalized family name.
- 6. Concatenate all the generated Metaphone keys
- 7. Deduplicate the list of keys

#### **Examples**

dnFamilyName	Tokens derived from dnFamilyName	Metaphone transformations	dnClusterFamilyName
ZHONG	ZHONG	JNK	JNK
XIAOJIAN	XIAOJIAN	SJN	SJN
ABACHE	ABACHE	APX	APX
ABANDA	ABANDA	APNT	APNT
ABD AL HAFIZ	HAFIZ ABDALHAFIZ	HFS APTL	HFS APTL
AL BUTHE	BUTHE ALBUTHE	PO ALPO	P0 ALP0
AL	AL	AL	AL
SOLEIMAN	SOLEIMAN HAMAD	SLMN HMT SLMN	SLMN HMT
HAMAD	SOLEIMANHAMAD		
GOODRIDGE	GOODRIDGE	KTRJ	KTRJ
GOODRICH SR	GOODRICH SR GOODRICHSR	KTRX SR KTRK	KTRX SR KTRK
NKOMO	NKOMO	NKM	NKM
N KOMO	N KOMO NKOMO	N KM NKM	N KM NKM

#### 2.2.2 Full Name Metaphone Pairs Cluster (dnClusterFullNameMeta)

The **Full Name Metaphone Pairs** cluster uses the normalized full name for the individual to generate a cluster key for every pair of names within the full name. The default logic of this is as follows:

1. Split the normalized full name into several name tokens, using space as a delimiter.

**Note:** Many other punctuation and noise characters are normalized to spaces before generating the cluster. For further information see <u>2.1.1: Name normalization</u>.

- 2. Sort the name tokens alphabetically.
- 3. Apply the **Metaphone** transformation (the standard double-metaphone algorithm) to each name token, outputting a key with a length of up to three characters.

- 4. Concatenate the Metaphone values, generating a final key value for each distinct pair of tokens.
- 5. Deduplicate the list of keys.

dnFullName	Name tokens a		Distinct Cluster Keys	dnClusterFullNameMeta	
XIAO JIAN ZHONG	JIAN	JN	JNS JNJNK SJNK	JNS JNJNK SJNK	
	XIAO	S			
	ZHONG	JNK	_		
ZHONG XIAOJIAN	XIAOJIAN	SJN	SJNJNK	SJNJNK	
	ZHONG	JNK			
MOHAMMED SANI	ABACHE	ABX	APXMHM APXSN	APXMHM APXSN	
ABACHE	MOHAMMED	MHMT	MHMSN	MHMSN	
	SANI	SN			
JOSEPH TSANGA	ABANDA	APNT	APNJSF APNTSN	APNJSF APNTSN JSFTSN	
ABANDA	JOSEPH	JSF	JSFTSN		
	TSANGA	TSNK			
ADD AL MALIAD ADD	ADD	ADT	ADTADT ADTA:	ADTABLIADTALIADTUSC	
ABD AL WAHAB ABD		APT	APTAPT APTAL	APTAPT APTAL APTHFS	
AL HAFIZ	ABD	APT	APTHFS APTAHP ALAL ALHFS ALAHP HFSAHP	APTAHP ALAL ALHFS  ALAHP HFSAHP	
	AL	AL			
	AL	AL	- III SAIIF		
	HAFIZ	HFS			
	WAHAB	AHP			
SULIMAN HAMD	AL	AL	ALPO ALHMT ALSLM POHMT POSLM HMTSLM SLMSLM	ALPO ALHMT ALSLM  POHMT POSLM HMTSLM  SLMSLM	
SULEIMAN AL	BUTHE	P0			
BUTHE	HAMD	HMT			
	SULEIMAN	SLMN			
	SULIMAN	SLMN			
AL BUTHE	AL	AL	ALPO ALHMT ALSLM	ALPO ALHMT ALSLM  POHMT POSLM HMTSLM	
SOLEIMAN HAMAD	BUTHE	Р0	POHMT POSLM		
	HAMAD	НМТ	HMTSLM		
	SOLEIMAN	SLMN			
REGINALD B	В	P	KTRRJN	KTRRJN	
GOODRIDGE	GOODRIDGE	KTRJ	Note: Initials are		
	REGINALD	RJNLT	ignored by default		
			when generating		
			cluster keys		
REGINALD B SR	В	Р	KTRRJN KTRSR RJNSR	KTRRJN KTRSR RJNSR	
GOODRICH	GOODRIDGE	KTRJ	Note: Initials are	·	
	REGINALD	RJNLT	ignored by default		
	SR	SR	when generating		
			cluster keys		
	L		1		

dnFullName	Name toker Metaphone		Distinct Cluster Keys	dnClusterFullNameMeta
STEPHEN JEQE NKOMO	JEQE NKOMO STEPHEN	JK NKM STFN	JKNKM JKSTF NKMSTF	JKNKM JKSTF NKMSTF
S J NKOMO	J NKOMO S	J NKM S	NKM Note: Initials are ignored by default when generating cluster keys	NKM
STEPHEN JEKE N KOMO	JEKE KOMO N STEPHEN	JK KM N STFN	JKKM JKSTF KMSTF	JKKM JKSTF KMSTF

## 2.2.3 Given Names Cluster (dnClusterGivenNames)

The **Given Names** cluster provides a further backup to the remaining clusters, especially to deal with cases where names are not necessarily well structured into family and given names.

**Note:** Depending on the quality and culture of the name information, this cluster will often not be required. You can test the number of additional alerts identified by the cluster by running matching with this cluster disabled, and then running with it enabled. Comparing the new relationships against the old will highlight the relationships identified by using this cluster.

The default logic of the cluster builder is as follows:

1. Split the normalized full name into several name tokens, using space as a delimiter.

**Note:** Many other punctuation and noise characters are normalized to spaces before generating the cluster. For further information see  $\underline{2.1.1:Name}$  normalization.

- 2. Standardize the normalized given names before clustering. This ensures, for example, that names such as 'William' and 'Bill' will be clustered together, although their raw Metaphone values are not the same. A space delimiter is used to split the name before standardizing.
- 3. Apply the **Metaphone** transformation to the whole of the given names value after token standardization, outputting a key with a length of up to 4 characters.

dnGivenNames	Metaphone values	dnClusterGivenNames
XIAO JIAN	SJN	SJN
ZHONG	JNK	JNK
MOHAMMED SANI	MHMT	MHMT
JOSEPH TSANGA	JSFT	JSFT
ABD AL WAHAB	APTL	APTL
SULIMAN HAMD SULEIMAN	SLMN	SLMN
AL BUTHE	ALP0	ALP0
REGINALD B	RJNL	RJNL

dnGivenNames	Metaphone values	dnClusterGivenNames
STEPHEN JEQE	STFN	STFN
SJ	SJ	SJ
STEPHEN JEKE	STFN	STFN

### 2.2.4 Full Name Trim Pairs Cluster (dnClusterFullNameTrim)

On occasion, two names which are close matches may not generate a common cluster key using the **Full Name Metaphone Pairs** cluster.

Consider the following two example records:

dnFullName	Name tokens and Metaphone values		Distinct Cluster Keys	dnClusterFullNameMeta
XIAO JIAN	JIAN	JN	JNS JNJNK SJNK	JNS JNJNK SJNK
ZHONG	XIAO	S	-	
	ZHONG	JNK		
ZHONG XIAOJIAN	XIAOJIAN	SJN	SJNJNK	SJNJNK
	ZHONG	JNK		

These two records are a possible name match. However, the **Full Name Metaphone Pairs** cluster does not produce a common cluster key for the pair because the tokens 'Xiao' and 'Xiaojian' yield different three character Metaphone keys.

In order to match these cases efficiently, a **Full Name Trim Pairs** cluster is prepared in a similar way to the primary cluster, but without applying a Metaphone transformation. This allows for typos and spacing differences in the names, but is 'left-biased'; that is, it demands that the first few characters of the names match.

The logic of the cluster is as follows:

- 1. Split the normalized full name into name tokens, using space as a delimiter.
- 2. Sort the name tokens alphabetically.
- 3. Apply the **Trim Characters** transformation to each name token, outputting a key with a length of (up to) 3 characters.
- 4. Concatenate the trimmed values, generating a final key value for each distinct pair of tokens.
- 5. Deduplicate the list of keys.

dnFullName	Name tokens and trimmed values		Cluster Keys	dnClusterFullNameTrim	
XIAO JIAN	JIAN	JIA	JIAXIA JIAZHO XIAZHO	JIAXIA JIAZHO XIAZHO	
ZHONG	XIAO	XIA			
	ZHONG ZHO				
ZHONG	XIAOJIAN		XIAZHO XIA	XIAZHO	
XIAOJIAN	ZHONG	ZHO			
MOHAMMED	ABACHE	ABA	ABAMOH ABASAN	ABAMOH ABASAN MOHSAN	
SANI ABACHE	MOHAMMED	МОН	MOHSAN		
	SANI	SAN			
JOSEPH	ABANDA	ABA	ABAJOS ABATSA JOSTSA	ABAJOS ABATSA JOSTSA	
TSANGA	JOSEPH	JOS			

dnFullName	Name tokens and values	l trimmed	Cluster Keys	dnClusterFullNameTrim	
ABANDA	TSANGA	TSA			
ABD AL	ABD	ABD	ABDABD ABDAL ABDHAF	ABDABD ABDAL ABDHAF	
WAHAB ABD	ABD	ABD	ABDWAH ALAL ALHAF	ABDWAH ALAL ALHAF	
AL HAFIZ	AL	AL	ALWAH HAFWAH	ALWAH HAFWAH	
	AL	AL			
	HAFIZ	HAF			
	WAHAB	WAH			
SULIMAN	AL	AL	ALBUT ALHAM ALSUL	ALBUT ALHAM ALSUL	
HAMD	BUTHE	BUT	ALSUL BUTHAM BUTSUL	BUTHAM BUTSUL	
SULEIMAN AL	HAMD	HAM	HAMSUL SULSUL	HAMSUL SULSUL	
BUTHE	SULEIMAN	SUL			
	SULIMAN	SUL			
AL BUTHE	AL	AL	ALBUT ALHAM ALSOL	ALBUT ALHAM ALSOL	
SOLEIMAN	BUTHE	BUT	BUTHAM BUTSOL	BUTHAM BUTSOL HAMSOL	
HAMAD	HAMAD	HAM	HAMSOL		
	SOLEIMAN				
REGINALD B	В	В	GOOREG	GOOREG	
GOODRIDGE	GOODRIDGE	G00	Note: Initials are ignored		
	REGINALD	REG	by default when		
	_	L	generating cluster keys		
REGINALD B	<u>B</u>	В	GOOREG GOOSR REGSR	GOOREG GOOSR REGSR	
SR GOODRICH	GOODRICH	G00			
	REGINALD	REG			
	SR	SR			
STEPHEN JEQE	JEQE	JEQ	JEQNKO JEQSTE NKOSTE	JEQNKO JEQSTE NKOSTE	
NKOMO	NKOMO	NKO			
	STEPHEN	STE			
S J NKOMO	<u>S</u>	S	NKO	NKO	
	NKOMO	NKO	Note: Initials are ignored		
	J	J	by default when		
CTEDUEN JEVE	IEKE	lick	generating cluster keys	IENNOVA   IENCEE   NOVACEE	
STEPHEN JEKE	JEKE	JEK	JEKKOM JEKSTE KOMSTE	JEKKOM JEKSTE KOMSTE	
N KOMO	KOMO	KOM	<b>Note:</b> Initials are ignored by default when		
	N	N	generating cluster keys		
	STEPHEN	STE	generating cluster keys		

## 2.2.5 Nationality Prohibition (Nationality Code)

This cluster uses the space-delimited list of nationality country codes to generate cluster keys by generating an array of the component country codes.

## 2.2.6 Residency Prohibition (Residency Code)

This cluster uses the space-delimited list of residency country codes to generate cluster keys by generating an array of the component country codes.

## 2.2.7 Name and Country (dnClusterNameCountry)

The **Name and Country** cluster provides a backup using more detailed information about names and combining them with country information. The cluster is used to compare very similar names that are located over the same countries.

Split the normalized Full Name into name tokens, using space as a delimiter.

**Note:** Many other punctuation and noise characters are normalized to spaces before generating the cluster. For further information see <u>2.1.1: Name normalization</u>.

- 2. Apply the **Metaphone** transformation to each name token, outputting a key with a length of up to twelve characters.
- 3. Sort the Metaphone values alphabetically.
- 4. For each country code associated with the record:
  - a. Concatenate the country code with the full set of Metaphone values, using an underscore as a separator.
  - b. If more than two Metaphone values are present, then iterate through all groups of Metaphone values which have exactly one value from the set missing, concatenating the country code onto the front of the Metaphone value set.
  - c. If the overall length of the **dnClusterNameCountry** field has exceeded 1000 characters, discard the last key and stop key generation.

## **Examples**

dnFullName	Country Codes	Name tokens and Metaphone values		Cluster Keys	dnClusterNameCountry
MOHAMME	ES GB	MOHAMMED	MHMT	ES_MHMT_SN GB_MHMT_SN	ES_MHMT_SN GB_MH
D SANI		SANI	SN		MT_SN
SULIMAN	ES TH GB	HAMD	HMT	ES_HMT_SLMN_SLMN	ES_HMT_SLMN_SLMN
HAMD		SULEIMAN	SLMN	ES_SLMN_SLMN	ES_SLMN_SLMN ES_HM
SULEIMAN		SULIMAN	SLMN	ES_HMT_SLMN	T_SLMN
				ES_HMT_SLMN	ES_HMT_SLMN TH_HM
				TH_HMT_SLMN_SLMN	T_SLMN_SLMN TH_SLM
				TH_SLMN_SLMN	N_SLMN TH_HMT_SLM
				TH_HMT_SLMN	N TH_HMT_SLMN GB_
				TH_HMT_SLMN	HMT_SLMN_SLMN GB_
				GB_HMT_SLMN_SLMN	SLMN_SLMN GB_HMT_
				GB_SLMN_SLMN	SLMN GB_HMT_SLMN
				GB_HMT_SLMN	
				GB_HMT_SLMN	

#### 2.2.8 Name and YOB (dnClusterNameYOB)

The **Name and YOB** cluster provides a backup using more detailed information about names and initials combining them with years of birth.

- 1. Standardize dnGivenNames and dnFamilyName;
- 2. Apply transliteration followed by the **Metaphone** transformation to the standardized given name, outputting a key with a length of up to four characters;
- Apply transliteration followed by the Metaphone transformation to the standardized family name, outputting a key with a length of up to four characters;

- 4. Extract and uppercase the first letter of the standardized dnGivenName;
- 5. Extract and uppercase the first letter of the standardized dnFamilyName;
- 6. Extract the first two years of birth from dnYOB to generate two values (referred to as 'First YOB' and 'Second YOB' in the remainder of this example);
- 7. Create up to four cluster keys by concatenating the following combinations of elements, using the underscore character:
  - a. First YOB + dnFamilyName (uppercased initial) + dnGivenNames (Metaphone).
  - b. First YOB + dnGivenNames (uppercased initial) + dnFamilyNames (Metaphone).
  - c. Second YOB + dnFamilyName (uppercased initial) + dnGivenNames (Metaphone).
  - d. Second YOB + dnGivenNames (uppercased initial) + dnFamilyNames (Metaphone).

**Note:** If any of the required data elements are missing, then the corresponding cluster key will not be generated.

8. Deduplicate the list of keys

## **Examples**

dnGivenNames, dnFamilyName	dnYOB	Name tokens and Metaphone values		Cluster Keys	dnClusterNameYOB
MOHAMMED,	1969	MOHAMMED	MHMT	1969_S_MHMT	1969_S_MHMT
SANI	1970	SANI	SN	1969_M_SN	1969_M_SN
	1971		•	1970_S_MHMT	1970_S_MHMT
				1970_M_SN	1970_M_SN
SULIMAN HAMD,	1980	HAMD	HMT	1980_S_SLMN	1980_S_SLMN
SULEIMAN	1981	SULEIMAN	SLMN	1981_S_SLMN	1981_S_SLMN
	1982	SULIMAN	SLMN		

## 2.2.9 First and Last Name (dnClusterFirstLast)

The **First and Last Name** cluster provides a tighter name only clustering method that relies on the first given name and last family name matching after standardization and allows for variation in any of the name tokens in-between.

- 1. Strip initials from the normalized given names and family name.
- 2. Strip all common name qualifiers from the normalized given names and family name, e.g. Al, Bin, Von.
- 3. Extract the first token from the stripped given names. If all tokens were stripped in steps 1 and 2, then extract the first token from the original normalized given names.
- 4. Extract the last token from the stripped family name. If all tokens were stripped in steps 1 and 2, then extract the last token from the original normalized family name.
- 5. Trim the extracted values to a maximum length of 4 characters.

6. Sort the trimmed values alphabetically and concatenate to generate the final key value.

## **Examples**

dnGivenNames	dnFamilyName	Extracted Values		dnClusterFirstLast
OSVALDO ANTONIO	CASTELL VALDEZ	OSVALDO	VALDEZ	OSVAVALD
ABU MAHDI	AL MUHANDIS	MAHDI	MUHANDIS	MAHDMUHA
ABU	NIDAL	ABU	NIDAL	ABUNIDA
VU	SHEIMAN	V	SHEIMAN	SHEIV

### 2.2.10 Original Script Name (dnClusterOriginalScript)

The **Original Script Name** cluster provides a clustering method for matching names represented in non-Latin writing systems. The cluster builder generates a key for each token in the name.

**Note**: A single cluster value of "Myanmar" is generated for original script names written in the Burmese alphabet irrespective of the name. This is needed because token splitting is not possible for the Myanmar writing system as it does not use a space character between words. As a result, all original script names in Burmese script will be compared during matching. This should not cause performance issues during screening providing there are a low number of customer records using this writing system.

The default logic of the cluster builder is as follows:

- 1. Split the original script name into several name tokens, using a space character as the delimiter.
- 2. Trim each name token to a maximum of 5 characters.
- 3. Concatenate all of the trimmed token values with a pipe separator
- 4. Deduplicate the list of keys.

## **Examples**

dnOriginalScriptName	dnClusterOriginalScript
Іван Антонавіч Шчурок	Іван Антон Шчуро
林 絽 蔵	林 紹 蔵
သင် သင် အေ	Myanmar
محمد محمد ماكوري	ماک وز محمد

## 2.2.11 First Initial Last Name (dnClusterInitials)

The **First Initial Last Name** cluster provides a clustering method to group together names that share the same first name initial and last name, and allows some variation for transposed names.

- 1. Split the normalized given names into several name tokens, using a space character as the delimiter.
- 2. Split the normalized family name into several name tokens, using a space character as the delimiter.

- 3. Generate the cluster key value as follows:
  - a. If there are two or more characters in the last token of the family name, then concatenate the first character of the given name with the last token of the family name.
  - b. If the last token of the family name is a single initial, then concatenate that character with the first token of the given name.
- 4. Trim the cluster key to a maximum of 12 characters.

## **Examples**

dnGivenNames	dnFamilyName	dnClusterFirstLast
MARTIN	JONES	MJONES
MARTIN PETER	JONES	MJONES
MARTIN	MORGAN JONES	MJONES
JONES	M	MJONES

## 2.3 Matching

Oracle Financial Services Customer Screening uses different approaches to matching for different use cases. For Sanctions screening, a zero tolerance approach to matching is assumed, where secondary data such as dates and years of birth, and nationalities cannot necessarily be assumed to be correct. In this case, it may be important to present matches where there is a level of name match even if other data would indicate that a match is unlikely. When screening against lists of Politically Exposed Persons (PEPs) or other individuals on watchlists (Enhanced Due Diligence matching), where the occasional 'false negative' may be tolerable from a business perspective, match rules are generally 'tighter' and demand at least one item of secondary data (such as a nationality, year of birth or date of birth) matches as well as a name of match. However, the screening rules for each screening process can, and should, be tailored according to the business appetite to risk. Oracle Financial Services Customer Screening also provides separate processes for Batch and Real-Time screening, as these may be subject to different matching strategies.

The following general notes describe the approach to matching:

- Matches are ranked according to how well the name matches. An exact name
  match rates as a match at the highest level, with the lowest level being
  represented by two loosely possible name matches with a different name
  structure. Further ranking is imposed by how well additional information (such
  as city or country information, and date of birth information) matches between
  the records.
- Oracle Financial Services Customer Screening allows for various levels of name match, including, but not limited to:
  - Name variation recognition. This is carried out by name standardization. For example, all variations of Mohammed (Muhamad, Mohammad, Mohamed and so on) are substituted with 'Mohammed' when matching. This is particularly used for given names, though also applied when matching whole names. For example, more than 20 variations of the name 'Mohammed' are recognized and considered to be the same name.

- Allowances for name abbreviation and initials. For example, 'Pete' is a possible match to 'Peter', and 'J' is a possible match to 'John'.
- Allowances for typographical errors and transliteration differences. For example, 'Abdool' is a possible match to 'Abdul', even if the variants are not standardized.
- Allowances for names being out of order or structured differently. For example, 'Mohammed Abbas Al-Tikriti' can be matched with 'Mohammed Al-Tikriti Abbas'.
- Allowance for additional names. For example, 'Juan Carlos Ferreira' can be matched with 'Juan Ferreira'.
- Allowance for names being split differently. For example, 'Xiao Jian' is a match to 'Xiaojian'.
- Oracle Financial Services Customer Screening attempts to prevent false positives by various means, including, but not limited to, the following methods:
  - Backing up typo tolerance with Metaphone matching. For example, 'Mary' and 'Mark' are not considered a match, although they are only one character different.
  - Backing up typo tolerance with consideration of the percentage of characters that are different. For example, the initials 'A' and 'E' are not considered a match, even though they are only one character different.
  - Considering the different significance and commonality of name tokens. For example, if name qualifiers such as 'Al' are shared between two Arabic names, this is not as significant as if an uncommon name such as 'Abbas' is shared.

**Note:** It may be advisable to tune the set of match rules that are activated. In particular, you may wish to activate or deactivate some of the lower match rules in the list, which lead to the weakest name matches. Factors affecting the usefulness of these rules include:

- the policies of the organization;
- the quality of the customer data; and
- the provenance of the customer data.

For example, Asian and Arabic names may be subject to more typographical and name ordering issues than other names. Where the data contains many of these names, the lower strength rules may identify more possible matches. The organization may want to review some or all of these as a matter of policy, or it may consider the matches too weak to review.

The required rules are easily activated or deactivated as needed in Oracle Financial Services Customer Screening.

#### 2.3.1 Match Rules

There are several different types of match rule involved in Individual Screening:

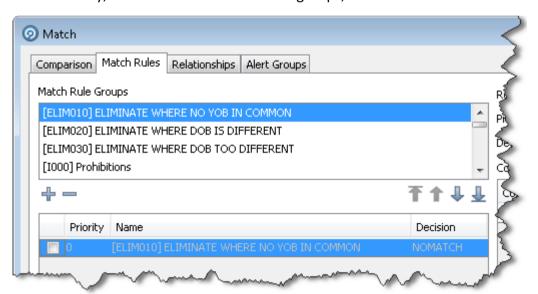
- The elimination rules. These are used in various positions in the rule templates to eliminate any records that have conflicting supporting data. The elimination rules may be moved up and down in order to change when they are applied during the matching process.
- The name matching rules. These are organized by the level of name match, with the strongest name matching rules placed at the top of the decision table.

**Note:** This means that the match rules are not ordered by strength across all identifiers. For example, a weaker name match that is strengthened by matches on date of birth, city and country is likely to be a stronger overall match than a strong name with strongly contradictory data in the other fields.

Oracle Financial Services Customer Screening includes many match rules for each level of name match, reflecting the match strength of any additional information, particularly date of birth and location data. The last rule in each set is a 'conflict' rule, and in many cases will be disabled by default. These rules allow records which fulfill the specified level of name match but have conflicting supporting data fields indicating that a true match is unlikely.

 The loose name matching rules. These are also based around name matching, but identify looser matches and are not enabled by default. These rules are likely to result in a large number of false positive matches and are most likely to be of use when screening against sanctions lists, where it is important that no true matches are missed.

For the sake of clarity, match rules are divided into groups, as shown below:



As each group is selected, the match rules it contains are displayed in the window below.

The priority of the groups can be changed using the arrows below the **Match Rules Group** list. When a group is highlighted:

- Click to move it up one place in the list.
- Click to move it down one place in the list.
- Click to move it to the top of the list.

• Click to move it to the bottom of the list.

The remainder of this section describes the matching rules that are present in Oracle Financial Services Customer Screening in greater detail.

## 2.3.2 Prohibition Rules

The Prohibition rules check for country information in an individual's record against the list of prohibited countries and nationalities maintained in List Management.

<b>Group Code</b>	Matching Rule	Summary of Rule Logic
1000A	Country prohibition - Residency	The country of residence given matches a prohibited country.
1000B	<b>Country prohibition - Nationality</b>	The nationality given matches a prohibited nationality.

## 2.3.3 Elimination Rules

Elimination Rule	Summary of Rule Logic	Enabled by
		default?
ELIMINATE WHERE NO YOB IN	This rule will eliminate pairs of records if both YOB fields are	Yes
COMMON	populated and there is no value in common.	
ELIMINATE WHERE DOB IS	This rule will eliminate pairs of records if both DOB fields are	No
DIFFERENT	populated and there is no value in common.	
ELIMINATE WHERE DOB TOO	This rule will eliminate pairs of records if the date of birth differs too	No
DIFFERENT	greatly between the two records. Pairs are eliminated if there are 6	
	or ore years difference between DoBs, <b>and</b> one typographical error,	
	and one typographical error in a month.	
<b>ELIMINATE WHERE GENDER IS</b>	This rule will eliminate pairs of records if the genders are different,	Yes
DIFFERENT AND BOTH	and EITHER both records had the gender specified as part of the	
DERIVED OR BOTH STATED	input record, OR both records have a gender value which was	
	derived from other fields.	
ELIMINATE WHERE NO	This rule will eliminate pairs of records if there are no countries in	Yes
COUNTRY SHARED AND ALL	common in the Country fields, AND if all countries listed are on the	
SAFE	Safe list.	
	The Safe list is maintained in the Match - Individual Safe Countries	
	ISO Codes Reference Data.	
ELIMINATE WHERE NO	This rule will eliminate pairs of records if the Nationality fields	Yes
NATIONALITIES IN COMMON	contain no common entries.	
ELIMINATE WHERE LIST	This rule will eliminate pairs of records if the List Occupation field	Yes
OCCUPATION IS SAFE	contains only values in the <b>Match</b> - <b>Safe Occupations</b> Reference	
	Data.	
ELIMINATE WHERE	This rule will eliminate pairs of records if the Customer Risk Score is	No
CUSTOMER RISK SCORE	below a threshold specified in the corresponding screening process.	
BELOW THRESHOLD		
<b>ELIMINATE WHERE LIST RISK</b>	This rule will eliminate pairs of records if the List Risk Score is below	No
SCORE BELOW THRESHOLD	a threshold specified in the corresponding screening process.	
ELIMINATE WHERE LIST PEP	This rule will eliminate pairs of records if the List PEP Risk Score is	No
RISK SCORE BELOW	below a threshold specified in the corresponding screening process.	
THRESHOLD		

**Note**: No elimination rules are enabled by default for Sanction records.

## 2.3.4 Name Matching Rules

Group Code	Matching Rule	Logic Summary	Example Matching Data
1010	Exact name	Given names and family name match exactly.	Given Names Family Name

Group Code	Matching Rule	Logic Summary	Example Match	ning Data
Code			JOSEPH	TSANGA
			JOSEPH	T'SANGA
				1
1020	Original script	The original script Name fields match exactly.	Original Script Name	Original Script Name
	Trainic Chart		АЛЕКСАНДР	АЛЕКСАНДР
			ОСОКИН	осокин
1030	Standardized given	Given names match after name standardization	Given Names	Family Name
	name	using Given name map. Family name matches	BILL	JONES
		exactly.	WILLIAM	JONES
1040	Full name	The full name matches exactly, after	Full Names	
		standardization of all name tokens using the Given	JOHN MIKE SM	ITH
		Name Map.	JOHN MICHAE	
1050	Full name without	The full name matches exactly, after	Full Names	2 3 7 7 7 7 7
1030	titles	standardization of all name tokens using the Given	DR DOUGLAS B	ΔKFR
	tities	Name Map and removal of titles.	DOUGLAS BAKE	
1060	Abbreviated	Given names match using a <b>Starts With</b>	Given Names	Family Name
1000	standardized given	comparison, after name standardization using the	JOSEPH	TSANGA
	name	Given Name Map. Family name matches exactly.	ABANDA	ISANGA
	Hame	Given Name Map. Family hame materies exactly.	JOSEPH	T'SANGA
1070	Given name	Given name matches with an <b>Edit Distance</b> of 1 or		
1070	similar and sounds	2 after name standardization. At least one of the	Given Names JOSEPH	Family Name ABANDA
	like	given names, excluding initials, must match by a 4-	JOESPH	ABANDA
	like	character Metaphone key. Family name matches	JOESPH	ADAINDA
		exactly		
1080	First name similar	The first given name matches with an <b>Edit Distance</b>	Given Names	Family Name
1080	and sounds like	of 1 or 2 and with a <b>Character Match Percentage</b> of	AMER	AL UBAIDI
	and sounds like	66% or more, after given name standardization. At	MOHAMMAD	AL OBAIDI
		least one of the given names, excluding initials,	RASHEED	
		must match by a 4-character Metaphone key.	AMIR RASHID	AL UBAIDI
		Family name matches exactly.	MOHAMMED	
1090	Additional given	All name tokens from the given names field with	Given Names	Family Name
	names		MOHAMMED	HANIF
		names field. Family name matches exactly .	DIN MOHAMED	HANIF
1100	Additional names	All name tokens from the full name with fewest	Full Name	
		tokens must be present in the other full name. At	LOTFI RIHANI	
		least 2 name tokens must match with the same	LOTFI BEN ABD	OL HAMID BEN
		matching logic; that is, if a name only has one	ALI RIHANI	
		token it is not considered a match. At least 2 name tokens must exist in the Full Name.		
		<b>Note:</b> Word Match Count may return >1 if a single		
		name matches twice in a longer name string. For		
		example, 'ABDUL' matches 'ABDUL ABDUL' with a		
		Word Match Count of 2.		
		Matching is order sensitive.		
l110	Original script	All names in the original script name fields match,	Original Script	Original Script
1110	name in any order	regardless of order.	Name	Name
	, , , , , , , , , , , , , , , , , , , ,	- Garanese et et et et	ΚΑΡΛΟΣ	ΜΟΛΙΝΑ
			ΜΟΛΙΝΑ	ΚΑΡΛΟΣ
I120	Original script	Original script name fields match with an 80%+		Original Script
•	name with typos	Character Match Percentage score.	Name	Name

Group Code	Matching Rule	Logic Summary	Example Matcl	ning Data
couc			Μολινα	Μολιννα
I130	All names in any order	All names in the full name match (using a <b>Word Edit Distance</b> of 0) after name token standardization, in any order. A single typo (1 character edit) is allowed in each name token.	Full Name ABDUL JABBER OMARI ABDUL	
1140	Abbreviated given name	Given names match using a <b>Starts With</b> comparison. Family name is a close metaphone match.	Given Names CHRIS CHRISTOPHER	Family Name HUNT HUNTER
1150	Abbreviated given name and family name typos	Given names match using a <b>Starts With</b> comparison, after name standardization using Given Name Map. Family name matches with an edit difference of 1-2. At least one of the family name tokens, excluding initials must match by a 4-character Metaphone key.	Given Names IBRAHIM ABDU SALAM IBRAHIM	Family Name IL MOHAMED BOYASSEER BOYASEER
1160	Abbreviated given name without titles and family name with typos	The first given name matches with a <b>Starts With</b> match, after name token standardization and stripping titles. Family name matches with an edit difference of 1-2. At least one of the family name tokens, excluding initials, must match by a 4-character Metaphone key.	Given Names SAHIR DR SAHIR MUS	Family Name BARHAN A BERHIN
1170	Original script name in any order with typos	All names in the original script name fields match, regardless of order, with each name requiring an 80%+ Character Match Percentage score.	Original Script Name XACAH ЧЕНГИЋ	Original Script Name ЧЕНГИЋ ХАССАН
1180	First name and full name similar and sounds like	The full name matches with a <b>Character Match Percentage</b> of 80% or above, after name token standardization. At least one of the family name tokens, excluding initials, must match by a 4-character Metaphone key.	MOHAMMAD HUSAYN	Family Name MASTASAEED MASTASAEED
1190	Given name similar and family names and sounds like	The given name matches with an <b>Edit Distance</b> of 1 or 2, after name standardization. The given name matches by 4-character Metaphone key, after name standardization. The family name matches with an <b>Edit Distance</b> of 1-2. The family name matches by 4-character Metaphone key.	AMER MOHAMMAD RASHEED	Family Name AL UBAIDI AL UBEIDI
1200	Abbreviated given name and family name similar	The first given name matches with a <b>Starts With</b> match, after name token standardization. The family name matches with an <b>Edit Distance</b> of 1 or 2. The family name matches by 4-character Metaphone key.	Given names VIKTOR ANATOLYEVICH VICTOR	Family name BOUT BOOT
1210	Original script name additional names	All names in one original script name field must be fully contained within the other field, provided there are at least two names in each field.	<b>Original Script Name</b> МИЛЕНКО ВРАЧАР	Original Script Name МИЛЕНКО ИВАНОВИЧ ВРАЧАР
1220	Additional names typo tolerant	All name tokens from the full name with fewest tokens must be present in the other full name. A character error tolerance of 20% is allowed (that is, one character edit every 5 characters). At least 2 name tokens must match with the same matching logic. If a name contains only one token it is not considered a match according to this rule.  Note: Word Match Count may return >1 if a single name matches twice in a longer name string. For	Full Name ABDUL WAHED ABDUL WAHAD	

Group Code	Matching Rule	Logic Summary	Example Match	ning Data
		example, 'ABDUL' matches 'ABDUL ABDUL' with a Word Match Count of 2. Matching is order sensitive.		
1230	Full name	The full name matches with a Contains match, after	Full Name	
	contained and	standardization of all name tokens using the Given	ABU BAKAR	
	multiple names in	Name Map. At least 2 name tokens must match in	ABU BAKAR BA	'ASYI
	common	the full name.		
1240	Full name	The full name matches with a Longest Common	Full Name	
	characters longer	Substring Sum Percentage of 90%+, relating to the	MOHAMMED A	
		longer string, and considering substrings of 5	ALGHABRA MU	
		characters or more in length, after name	RAMATULLAH	
		standardization.	FAQIR MOHAN	
			WAHIDYAR RAI	
1250	Original script	All names in one original script name field must be	Original Script	
	name additional	fully contained within the other field, provided	Name	Name
	names with typos	there are at least two names (all of which have an	ЮРИ НЕЁЛОВ	ЮРИЙ
		80%+ Character Match Percentage) in each field.		ВАСИЛЬЕВИЧ НЕЁЛОВ
1260	Abbreviated first	The first given name matches with a <b>Starts With</b>	Given Names	Family Name
1200	name	match, after name token standardization. Family	KHADAF	JANJALANI
	Hame	name matches exactly.	ABUBAKAR	57 (1457 (E) (141
		name materies exactly.	KHADAFFI	JANJALANI
1270	Additional names	All name tokens from the full name with fewest	Full Name	,, . <u></u>
	in any order	tokens must be present in the other full name. At	HA THI NGUYEI	V
	, , , , , ,	least 2 name tokens must match with the same	THI HA	
		matching logic. If a name contains only one token it		
		is not considered a match according to this rule.		
		NOTE: Word Match Count may return >1 if a single		
		name matches twice in a longer name string. For		
		example, 'ABDUL' matches 'ABDUL ABDUL' with a		
		Word Match Count of 2.		
		Matching is order insensitive.		
1280	Additional names	All name tokens from the full name with fewest	Full Name	
	in any order typo	tokens must be present in the other full name. A	STEPHENS MAR	RTIN
	tolerant	character error tolerance of 20% is allowed (that is,	MARRTIN JOHN	I STEPHENS
		one character edit every 5 characters). At least 2		
		name tokens must match with the same matching		
		logic. If a name contains only one token it is not		
		considered a match according to this rule.		
		Note: Word Match Count may return >1 if a single		
		name matches twice in a longer name string. For		
		example, 'ABDUL' matches 'ABDUL ABDUL' with a		
		Word Match Count of 2.		
		Matching is order insensitive.		

## 2.3.5 Loose Name Matching Rules

Group Code	Matching Rule	Summary of Rule Logic	Example Matching Data
1290	Full name characters	The full name matches with a Longest Common Substring Sum	Full Name
	shorter	Percentage of 90%, relating to the shorter string, and considering	ABU BAKAR

Group Code	Matching Rule	Summary of Rule Logic	Example Matching Data
		substrings of 5 characters or more in length, after name	ABU BAKAR
		standardization. At least 2 name tokens must exist in the full	BA'ASYI
		name.	
1300	Full name no initials	All initials in one Full Name field must be fully contained within	Full Name
	match with initials in	the initials of the other Full Name field; AND	CARL J
	any order relating to	the standardized Full Name field without initial must be fully	FISHER
	shorter	contained within the other standardized Full Name field without	J C FISHER
		initials; AND	
		both fields must contain at least two names.	
I310	Full name contained,	The Full Name field from the watch list record contains only one	Full Name
	last initial same,	name, which is fully contained within the record being screened;	JANINE
	primary list is single	AND	CHERRY
	token	the initial of the last name in the record being screened must	CHERRY
		match the initial of the name in the watch list record.	_

## 2.3.6 Deprecated Name Matching Rules

All these rules are assigned the Rule Group Code 1990. These are legacy rules that are superseded by the above rule set, and are included here to assist existing Customer Screening customers with the transition to the current version.

Name matching rule	Summary of rule logic	Example mato	hing data
Given name in	At least one given name is found in common, after name	<b>Given Names</b>	Family
common	standardization. Family name matches exactly.		Name
		HASSAN ALI	AL TIKRITI
		IBRAHIM	AL TIKRITI
		HASSAN	
Full name similar	Full name matches with a <b>Character Match Percentage</b> of	Full Name	
and family name	80% or more after name standardization. At least one of the	AKHYAR MOH	AMMED
sounds like	family name tokens (excluding initials) must match by a 4-	MANSOUR	
	character Metaphone key.	AKHTAR MUH	AMED
		MANZUR	
Similar first name	The first given name matches with an edit distance of	<b>Given Names</b>	Family
	between 1 and 2 after name standardization, and with a		Name
	Character Match Percentage of 66% or more. Family name	MIKOLAI	METELITSA
	matches exactly.	NIKOLAI	METELITSA
		TIMOFEEVICH	
Similar first name	The first given name matches with an edit distance of	<b>Given Names</b>	Family
and family name	between 1 and 2 after name standardization, and with a		Name
	Character Match Percentage of 66% or more. Family name	GENNADY	NEVYGLAS
	matches with a <b>Character Match Percentage</b> of 66% or more.	GENNADIY	NYAVIGLAS
	At least one of the family name tokens (excluding initials)		
	must match by a 4-character Metaphone key.		•
Given names in	At least one given name is found in common, after name	<b>Given Names</b>	
common and similar	,		Name
family name and	<b>Edit Distance</b> of 1-2. The family name matches by 4-character	ABDUL	OMAIRI
sounds like	Metaphone key.	JABBAR	
		FAROUK	OMARI
		ABDUL	
Abbreviated	Given names match using a <b>Starts With</b> comparison, after	<b>Given Names</b>	-
standardized given	name standardization using the Given Name Map. Family	-	RAHIMI
name and family	name matches using <b>Contains</b> comparison after token	ABDUL	RAHIM
name contained	standardization.		

Name matching rule	Summary of rule logic	Example mato	hing data
Similar given name	The given name matches with a <b>Character Edit Distance</b> of	<b>Given Names</b>	Family Name
	between 1 and 2 after name standardization. Family name	NAY	WIN
	matches exactly.	NYAW	WIN
Full name contained	The full name matches with a <b>Contains</b> match, after	Full Name	
	standardization of all name tokens using the Given Name	<b>CHARNI KOKO</b>	
	Мар.	ко ко	
Full name similar	The full name matches with a Character Match Percentage of	Full Name	
	80% or above, after name token standardization.	JUAN LOIS RU	BENACHROIG
		JUAN LOIS RU	BENACH ROIZ
Abbreviated first	The first given name matches with a <b>Starts With</b> match, after	<b>Given Names</b>	Family
name and similar	name token standardization. The family name matches with a		Name
family name	Character Edit Distance of 1-2.	Α	UMARI
		ABU	OMAR
Given name in	At least one given name is found in common, after name	<b>Given Names</b>	Family
common and similar	standardization. The family name matches with a <b>Character</b>		Name
family name	<b>Edit Distance</b> of 1-2. The family name matches by 4-character	NURJAMAN	ISAMU DIN
	Metaphone key.	RIDUAN	
		RIDUAN	ISOMUDDIN
First name and	The first given name matches with a <b>Character Edit Distance</b>	<b>Given Names</b>	Family Name
family similar	of between 1 and 2 after name standardization, and with a	REGINADL	GOODRIDGE
	Character Match Percentage of 66% or more. Family name	REGINALD	GOODRICH
	matches with a <b>Character Match Percentage</b> of 66% or more.		

## 2.3.7 Ranking matches within Name rules

Match Rule	Summary of Matching Logic	Examp	le Matchi	ng Data	
[Name rule], city,	At least one city matches. Date of birth matches	DoB	(	City	
DoB	exactly.	01/11/	1963 L	ondon.	
		01/11/	1963 N	New York	
			L	ondon.	
[Name rule], country,	At least one country matches. Date of birth matches	DoB	(	Country	
DoB	exactly.	25/01/	1959 F	K IN US	
		25/01/	1959 F	PK	
[Name rule], DoB	Date of birth matches exactly.	DoB			
		19/09/	1968		
		19/09/	1968		
[Name rule], city,	At least one city matches. Year of birth matches. No	YoB	City		DoB
YoB, no DoB	date of birth provided.	1978	Lahore	Mumbai	-
		1978	Lahore		-
[Name rule], country,	At least one country matches. Year of birth matches.	YoB	Country		DoB
YoB, no DoB	No date of birth provided.	1962	IQ US		-
		1962	IQ		-
[Name rule], YoB, no	Year of birth matches. No date of birth provided.	YoB			DoB
DoB		1975			-
		1975			-
[Name rule], city,	At least one city matches. Dates of birth are a close	DoB		City	
DoB similar	match, according to <b>one</b> of the following parameters	eters 08/04/1967 R		Riyad	dh
only:		04/08/	1967	Riyad	dh
	DD and MM values are transposed, but YYYY matches				
	exactly.				
	DD and MM match, YYYY does not.				
	DD and YYYY match, MM does not.				
	DD values differ by 5 or less.				
[Name rule], country,	At least one country matches. Dates of birth are a	DoB		Count	ry

Match Rule	Summary of Matching Logic	Examp	le Matching	Data
DoB similar	close match, according to <b>one</b> of the following	08/04/	1967	SA
	parameters only:	08/04/	<b>1</b> 977	SA
	DD and MM values are transposed, but YYYY matches			•
	exactly.			
	DD and MM match, YYYY does not.			
	DD and YYYY match, MM does not.			
	DD values differ by 5 or less.			
[Name rule], DoB	Dates of birth are a close match, according to <b>one</b> of	DoB		
similar	the following parameters only:	19/06/	1967	
	DD and MM values are transposed, but YYYY matches	16/06/	1967	
	exactly.			
	DD and MM match, YYYY does not.			
	DD and YYYY match, MM does not.			
	DD values differ by 5 or less.		•	•
	At least one city matches. Year of birth matches.	YoB	City	DoB
(DoB conflict)	Dates of birth do not match.	1978	Lahore	13/04/1978
		-	Mumbai	
		1978	Lahore	04/08/1978
[Name rule], country,	=	YoB	Country	DoB
YoB (DoB conflict)	Dates of birth do not match.	1962	IQ	05/07/1962
		1962	IQ	04/11/1962
	Year of birth matches. Dates of birth do not match.	YoB		DoB
conflict)		1962		05/07/1962
		1962		04/11/1962
[Name rule], city	At least one city matches.	City		
		Lahore	e  Mumbai	
		Lahore	<u>.</u>	
[Name rule], country	At least one country matches.	Count	ry	
		IQ PK		
		IQ		
[Name rule] only	Name rule returns a match. No data in other fields.	Name	Country	DoB
		J SMIT	Н -	-
		J SMIT	Н -	-
[Name rule] (conflict)	Name rule returns a match. Data in other fields does	Name	Country	DoB
	not match.	J SMIT	H IQ	05/07/1962
		J SMIT	H UK	04/11/1974

## **Chapter 3: Entity Matching**

This section details the default configuration when matching entities to Sanctions, PEP and EDD lists. In general, and by default, the matching strategy for entities in Oracle Financial Services Customer Screening will raise a possible match if there is an exact match or a fuzzy name match to a normal (non-acronym) entity name, or if there is an exact match to an acronym entity name.

The fuzzy entity name matching algorithms include the following techniques (amongst others):

- Standardizing entity names (for example, different forms of company name suffixes are standardized to a common form)
- Ignoring insignificant name tokens
- Typo tolerance
- Allowance for missing name tokens
- Allowance for different tokenization of the name

## 3.1 Identifier Preparation

The following identifiers are prepared for use in the entity matching process:

Identifier	Summary of preparation logic
Original Entity	The original entity name, after Name Normalization. See section 3.1.1 "Name
Name	Normalization" below.
Standardized Entity Name	A standardized version of the entity name, with common entity name suffixes standardized. The standardization process may be amended by changing the Reference Data used to standardize tokens (such as LTD) and phrases (such as FIN SERVS).
Original Script	A whitespace normalized version of the original script name.
Name	
City	A pipe-separated list of cities.
Country Codes	A space separated list of standard 2-character country codes.

#### 3.1.1 Name Normalization

Entity names are normalized using the following logic:

- 1. Standardization of accented characters.
- 2. Removal of apostrophes.
- 3. Replacement of all other characters apart from alpha (A-Z or a-z), numeric (0-9) or ampersand (&) characters with spaces.

**Note:** If matching data in the original language against original script names in watch lists, the appropriate character ranges should be removed from the Name Noise Characters Reference Data so that they are not replaced. In addition, if transliterating data before matching, transliteration must be done before name normalization.

- 4. Normalization of whitespace.
- 5. Conversion to upper case.

## 3.2 Clustering

Oracle Financial Services Customer Screening provides three different clustering strategies for matching entities: **Entity Name Tokens**, **Name Metaphone**, and **Name Trimmed**. Any of the clusters may be activated or deactivated, as required, and different cluster limits can be configured.

## 3.2.1 Entity Name Tokens (dnClusterNameTokens)

This cluster uses the standardized entity name to generate cluster keys. The default logic is as follows:

- 1. Remove initials.
- 2. Remove common name tokens, such as Limited, or Corporation.
- 3. Normalize whitespace.
- 4. Convert space characters to pipe characters.

### **Examples**

dnEntityName	Name with initials and common name tokens stripped	dnClusterNameTokens
ANGLO CARIBBEAN	ANGLO CARIBBEAN	ANGLO CARIBBEAN
CO LTD		
GUAMATUR S A	GUAMATUR	GUAMATUR

## 3.2.2 Name Metaphone (dnClusterLongName)

This cluster uses the standardized entity name to generate cluster keys. The default logic is as follows:

- 1. Remove initials.
- 2. Remove common name tokens, such as Limited, or Corporation.
- 3. Normalize whitespace.
- 4. Remove common business words, such as Company, or Association.
- 5. Transliterate any non-Latin characters into Latin.
- 6. Apply the **Metaphone** transformation (the standard double-Metaphone algorithm) outputting a key with a length of up to eight characters.

dnEntityName	Name with initials, common name tokens and common business words stripped	dnClusterLongName
HAVANA INTERNATIONAL BANK LTD	HAVANA BANK	HFNPNK
CIMEX S A	CIMEX	SMKS
LA EMPRESA CUBANA DE FLETES	EMPRESA CUBANA FLETES	AMPRSKPN

#### 3.2.3 Name Trimmed (dnClusterShortName)

This cluster uses the standardized entity name to generate cluster keys. The default logic is as follows:

- 1. Remove all whitespace.
- 2. Left-trim the value to a maximum of 4 characters.

## **Examples**

dnEntityName	dnClusterShortName
HAVANA INTERNATIONAL BANK LTD	HAVA
CIMEX S A	CIME
LA EMPRESA CUBANA DE FLETES	LAEM

## 3.2.4 Registration Country Prohibition (Registration Country Code)

This cluster uses the space-delimited list of registration country codes to generate cluster keys by generating an array of the component country codes.

## 3.2.5 Operating Country Prohibition (Operating Country Code)

This cluster uses the space-delimited list of operating country codes to generate cluster keys by generating an array of the component country codes.

## 3.2.6 Start/End Name Tokens (dnClusterStartEndNameTokens)

This clustering method is designed as a looser version of the Entity Name Tokens cluster and allows for variation in entity names by creating clusters for the first five and last five characters of each name token.

The default logic is as follows:

- 1. Remove initials.
- 2. Remove common name tokens, such as Limited, or Corporation.
- 3. Normalize whitespace.
- 4. For each token that is longer than five characters, replace with two new tokens that are:
  - a. The first five characters of the token.
  - b. The last five characters of the token.

dnEntityName	Name with initials and common name tokens stripped	dn Cluster Start End Name Tokens
HAVANA	HAVANA	HAVAN AVANA INTER IONAL BANK
INTERNATIONAL	INTERNATIONAL	
BANK LTD	BANK	
CIMEX S A	CIMEX	CIMEX
LA EMPRESA	LA EMPRESA	LA EMPRE PRESA CUBAN UBANA FLETE LETES
CUBANA DE	<b>CUBANA FLETES</b>	
FLETES		

#### 3.2.7 Original Script Name (dnClusterOriginalScript)

The Original Script Name cluster provides a clustering method for matching names represented in non-Latin writing systems. The cluster builder generates a key for each token in the name.

**Note**: A single cluster value of "Myanmar" is generated for original script names written in the Burmese alphabet irrespective of the name. This is needed because token splitting is not possible for the Myanmar writing system as it does not use a space character between words. As a result, all original script name in Burmese will be compared during matching. This should not cause performance issues during screening providing there are a low number of customer records using this writing system.

The default logic of the cluster builder is as follows:

- 1. Split the original script name into several name tokens, using a space character as the delimiter.
- 2. Trim each name token to a maximum of 5 characters.
- 3. Concatenate all of the trimmed token values with a pipe delimiter
- 4. Deduplicate the list of keys.

## **Examples**

dnOriginalScriptName	dnClusterOriginalScript
ЧЕРЕН СЕПТЕМВРИ	ЧЕРЕН СЕПТЕ
北京航空航天大学	北 京 航 空 航 天 大 学
အဲပုဂံ	Myanmar

## 3.3 Matching

Entity matching is centered around entity names. Other items of data, such as associated countries and cities, are used to strengthen a possible match.

#### 3.3.1 Match Rules

The match rules in Oracle Financial Services Customer Screening are organized by the level of entity name match, with the strongest name matching rules at the top of the decision table.

Optional elimination rules exist that allow lower risk matches to be suppressed.

There are three types of match rule involved in entity screening:

- The elimination rules, which are used in the rule templates to suppress the generation of lower risk matches for example, low quality matches against list records with a low risk score. The elimination rules may be moved up and down in order to change where they apply.
- The entity name matching rules. Entity name matching rules are organized by the level of entity name match, with the strongest matching rules placed at the top of the decision table.

**Note:** This means that the match rules are not ordered by strength across all identifiers. For example, a weaker match rule that is strengthened by matches on

City and Country is likely to be a stronger overall match than a strong match rule with strongly contradictory data in the other fields.

The loose entity matching rules. These are also based around entity name
matching, but identify looser matches and are not enabled by default. These
rules are likely to result in a large number of false positive matches and are most
likely to be of use when screening against sanctions lists, where it is important
that no true matches are missed.

For the sake of clarity, match rules are divided into groups, as shown below:



As each group is selected, the match rules it contains are displayed in the window below.

The priority of the groups can be changed using the arrows below the **Match Rules Group** list. When a group is highlighted:

- Click to move it up one place in the list.
- Click to move it down one place in the list.
- Click to move it to the top of the list.
- Click to move it to the bottom of the list.

The remainder of this section describes the entity matching rules that are present in Oracle Financial Services Customer Screening in greater detail.

## 3.3.2 Prohibition Rules

The Prohibition rules check for country information in an entity's record against the list of prohibited countries and nationalities maintained in List Management.

Group Code	Matching Rule	Summary of Rule Logic
E000A	Country prohibition - Operating country	The country or countries of operation given match at least one prohibited country.
E000B	Country prohibition - Registration country	The country or countries of registration given match at least one prohibited country.

#### 3.3.3 Elimination Rules

Elimination Rule	Summary of Rule Logic	Enabled by default?
ELIMINATE WHERE NO COUNTRY SHARED AND ALL SAFE	This rule will eliminate pairs of records if there are no countries in common in the Country fields, AND if all countries listed are on the Safe list.  The Safe list is maintained in the Match - Entity Safe Countries ISO Codes Reference Data.	Yes
ELIMINATE WHERE CUSTOMER RISK SCORE BELOW THRESHOLD	This rule will eliminate pairs of records if the Customer Risk Score is below a threshold specified in the corresponding screening process.	No
ELIMINATE WHERE LIST RISK SCORE BELOW THRESHOLD This rule will eliminate pairs of records if the List Risk Score is below a threshold specified in the corresponding screening process.		No
ELIMINATE WHERE LIST PEP RISK SCORE BELOW THRESHOLD	This rule will eliminate pairs of records if the List PEP Risk Score is below a threshold specified in the corresponding screening process	Yes

**Note**: No elimination rules are enabled by default in Sanctions screening.

## 3.3.4 Entity Matching Rules

Note that all entity matching rules use a standardized form of the entity name. The strongest rules use the 'part-standardized name', meaning the entity names match after only simple global standardizations (such as considering AND and & as the same) are applied. Other rules apply additional rules for standardization as noted in the table below.

**Note**: that wherever 'word' is used below, this means a space-delimited token in the prepared names.

Group Code	Name Matching Rule	Summary of Rule Logic	Example Matching Data
V010	Vessel part-	The part-standardized entity name matches the	DYNASTY
	standardized name	name of a listed vessel exactly.	DYNASTY
	exact		
V020	Vessel name exact	The entity name matches the name of a listed	4TH OCEAN
		vessel after number cardinal and ordinal	FOURTH OCEAN
		standardization.	
V030	Vessel part-	The part-standardized entity name matches the	RAHIM
	standardized name	name of a listed vessel with a Character Match	RAHIM 3
	with typos	Percentage of 80-99%.	
V040	Vessel name with	The entity names match with a Character Match	RAHUM 3
	typos	Percentage of 80-99% after number cardinal	TRAHIM THREE
		and ordinal standardization.	
E010	Part-standardized	The part-standardized entity name matches a	HUMAN APPEAL
	name exact	listed entity name exactly.	INTERNATIONAL
			HUMAN APPEAL
			INTERNATIONAL
E020	Name exact	The entity names match exactly after number	NOVEMBER 17
		cardinal and ordinal standardization.	NOVEMBER
			SEVENTEEN
E030	Original script name	The original script names match exactly.	ОАО ПЄАИН
	exact		ОАО ПЄАИН
E040	Name without	The entity names match exactly after number	CAPITAL DIRECT LTD

Group Code	Name Matching Rule	Summary of Rule Logic	Example Matching Data
Code	suffixes exact	cardinal and ordinal standardization, and after common company prefixes and suffixes are	CAPITAL DIRECT AG
E050	Name without	removed.  The entity names match with a Word Match	PARAGON UK
	business words similar and sounds like	Percentage of 80% after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. The first word of each name has the same 4-character Metaphone key.	PARAGON INVESTMENT CORPORATION
E060	Name without business words exact	The entity names match exactly after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed.	LIFE HEALTHCARE GROUP HOLDINGS LTD LIFE HEALTH CARE INC
E070	Name without business words has all words out-of- order	All remaining words in each entity name match exactly, but in any order, after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed.	EDUCATION FOR HEALTH HEALTH EDUCATION SERVICES
E080	Name without suffixes starts with and multiple names in common	The entity names are a Starts With match after number cardinal and ordinal standardization, and after common company prefixes and suffixes are removed. There are at least two significant words (not common business words) in common between the two names. The listed name is not an acronym alias of a longer primary entity name.	BAE SYSTEMS (LANCASTER HOUSE) LIMITED BAE SYSTEMS PLC
E090	Name without business words has all words with typos	All remaining words in each entity name match with a Character Match Percentage of 80 or more, after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed.	GERBERA ASSOCIATES LTD BERBERA
E100	Original script name in any order	All words in the Original Script Names match exactly, in any order.	ОАО НИАЭП ОАО ОАО
E110	Original script name with typos	The Original Script Names match with a Character Match Percentage of 80% or more.	ΕΠΑΝΑΣΤΑΤΙΚΉ ΑΡΙΣΤΕΡΆ ΕΠΑΝΑΣΤΑΙΚΉ ΑΡΙΣΤΕΡΆ
E120	Name without business words with typos, and sounds like	The entity names match with a Character Match Percentage of 80 ore more after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. The first word of each name has the same 4-character Metaphone key and the first three letters of each name are the same.	GOLDSTREAM PROPERTIES LTD GOLDSTEIN PROPERTIES INC
E130	Name without suffixes contains, similar and multiple names in common	The entity names are a Contains match and the Word Edit Distance is no more than one between the names (where each word matches with a Character Match Percentage of 80 or more), after number cardinal and ordinal standardization, and after common company prefixes and suffixes are removed. There are at least two significant words (not common	HAMPSHIRE HERITAGE DEVELOPMENTS LTD HERITAGE DEVELOPMENT CORPORATION

Group Code	Name Matching Rule	Summary of Rule Logic	Example Matching Data
Couc		business words) in common between the two names.	Data
E140	Name has additional words, sounds like and multiple names	All words in the shorter entity name exist in the longer entity name (in order) after number cardinal and ordinal standardization, and after	MOSCOW CITY CENTER PLC MOSCOW CENTER
	in common	common company prefixes and suffixes are removed. There are at least two significant words (not common business words) in	
		common between the two names. The list name is not an acronym alias of a longer primary entity name.	
E150	Name without business words contains, sounds like	The entity name is a Contains match with a listed entity name, after number cardinal and ordinal standardization, and after common	HI-TECH RECRUITMENT LTD HI TECH GROUP
	and multiple names in common	company prefixes, suffixes and other words are removed. There are at least two significant words (not common business words) in	
		common between the two names. The first word of each name has the same 4-character Metaphone key.	
E160	Original script name in any order with typos	All words in the original script name match with a Character Match Percentage of 80 or more, in any order.	ΜΑΎΡΟΣ ΣΕΠΤΈμΒΡΗΣ ΣΕΠΤΈμΒΡΗΣ
			ΜΑΎΡΟΣΣ
E170	Name without business words has	The entity names match (in any order) with a Word Match Percentage of between 75 and 99,	BACK TO HEALTH CLINICS LIMITED
	most words out-of- order	after number cardinal and ordinal standardization, and after common company	BACK TO HEALTH CHIROPRACTIC
		prefixes, suffixes and other words are removed. The list name is not an acronym alias of a longer primary entity name.	
E180	Name without business words,	All words in the shorter entity name exist in the longer entity name (in order) after number	CHARLES ASH UK LTD
	similar, sounds like, with multiple names and a residual token	cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. There are at least two	CHARLES F ASH CONSTRUCTION CO INC
	in common  Note: The group  name differs from the	significant words (not common business words) in common between the two names, and at least one of these is not a word in the English	
	rule name. See the Match dialog for details.	dictionary or a very common word in Watchlist name data. The list name is not an acronym alias of a longer primary entity name.	
E190	Name without business words,	All words in the shorter entity name match with a Character Match Percentage of 80 or more in	CLARKS HOME BAKERY LTD
	similar with typos, sounds like, with multiple names and	the longer entity name (in order) after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other	CLARK HOMES INC
	residual token in common Note: The group	words are removed. There are at least two significant words (not common business words) that match with a Character Match Percentage	
	namediffers from the rule name. See the	of 80 or more, and at least one of these is not a word in the English dictionary or a very	
	Match dialog for details.	common word in Watchlist name data. The list name is not an acronym alias of a longer	

Group	Name Matching Rule	Summary of Rule Logic	Example Matching
Code		primary antity name	Data
E200	Name without business words, similar, sounds like, and residual token in common	primary entity name.  All words in the shorter entity name match in the longer entity name (in order) after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. The names match with a	AMERICAN MILITARY SUPPLY AMERICAN SUPPLY CO
	common	Word Match Percentage of 50 or more when common business words are not stripped. There are at least two significant words (not common business words) that match. The first word of each name has the same 4-character Metaphone key. The list name is not an acronym alias of a longer primary entity name.	
E210	Name has additional words tolerant, sounds like and multiple names in common	All words in the shorter entity name match in the longer entity name (in order) with a Character Match Percentage of 80 or more after number cardinal and ordinal standardization. There are at least two significant words (not common business words) in common between the two names. The list name is not an acronym alias of a longer primary entity name.	GENERAL ATOMICS GENERAL BUREAU OF ATOMIC ENERGY GBAE
E220	Name without suffixes contains, similar and residual token in common	The entity names are a Contains match and the Word Edit Distance is no more than one between the names (where each word matches with a Character Match Percentage of 80 or more), after number cardinal and ordinal standardization, and after common company prefixes and suffixes are removed. There is at least one significant word in common (not a common business word, a word in the English dictionary or a very common word in Watchlist name data).	ACCLAIM ACM LTD ACM
E230	Name without suffixes starts with and residual token in common	The entity names are a Starts With match after number cardinal and ordinal standardization, and after common company prefixes and suffixes are removed. There is at least one significant word in common (not a common business word, a word in the English dictionary or a very common word in Watchlist name data). The listed name is not an acronym alias of a longer primary entity name.	ENRON METALS BROKERS LTD ENRON CORP
E240	Name without suffixes starts with and substring in common	The entity names are a Starts With match, and there is a common substring at least 8 characters in length, after number cardinal and ordinal standardization, and after common company prefixes and suffixes are removed. The listed name is not an acronym alias of a longer primary entity name.	ACCURATE SECTION BENDERS LTD ACCURATE
E250	Name without suffixes contains, residual token in common and significant overlap	The entity names are a Contains match and the Word Match Percentage is 50 or more, after number cardinal and ordinal standardization, and after common company prefixes and suffixes are removed. There is at least one significant word in common (not a common	NON EMERGENCY TRANSPORT INC ACTION NON EMERGENCY TRANSPORTATION

Group	Name Matching Rule	Summary of Rule Logic	Example Matching
Code		business word, a word in the English dictionary or a very common word in Watchlist name data).	Data
E260	Name without common tokens exact, and multiple residual tokens in common	The entity names match exactly, with at least two words matching, after number cardinal and ordinal standardization, and after common company prefixes, suffixes, and other words, and all English dictionary and common Watchlist name words are removed.	LIFE CARE CENTER PUNTA GORDA PORT OF PUNTA GORDA
E270	Original script name has additional names	All words in the shorter original script name match in the longer original script name (in order), and there are at least two matching words.	ВЪОРЪЖЕНА ИСЛЯМСКА ГРУПА ВЪОРЪЖЕНА ГРУПА
E280	Name without suffixes contains, multiple names in common and significant overlap	The entity names are a Contains match and the Word Match Percentage is 50 or more, after number cardinal and ordinal standardization, and after common company prefixes and suffixes are removed. There is at least two significant words (not common business words) that match with a Character Match Percentage of 80 or more.	CITY TRANS LTD CAPITAL CITY TRANS SERV INC
E290	Name without business words similar and full name sounds like	The entity names match with a Character Match Percentage of between 80 and 99 after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. The names share the same metaphone key after number cardinal and ordinal standardization.	IBERIA AIRLINES IBERAIR LINES
E300	Name without business words similar with typos, sounds like and significant overlap	All words in the shorter entity name match with a Character Match Percentage of 80 or more in the longer entity name (in order) after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. The names match with a Word Match Percentage of 50 or more when common business words are not stripped. There are at least two significant words (not common business words) that match with a Character Match Percentage of 80 or more. The first word of each name has the same 4-character Metaphone key. The list name is not an acronym alias of a longer primary entity name.	MED CLINIC LTD MED AMERICA CLINICS INC
E310	Name has additional words, sounds like and residual token in common	All words in the shorter entity name exist in the longer entity name (in order) after number cardinal and ordinal standardization. There is at least one significant word (not a common business word, an English dictionary word or a word or a common Watchlist name word) in common between the two names. The list name is not an acronym alias of a longer primary entity name.	DJ CASE AND ASSOCIATES INC DJ AND ASSOCIATES INC
E320	Name has additional words with typos,	All words in the shorter entity name match with a Character Match Percentage of 80 or more in	GARLICK GARLICK

Group Code	Name Matching Rule	Summary of Rule Logic	Example Matching Data
Code	sounds like and residual token in common	the longer entity name (in order) after number cardinal and ordinal standardization. There is at least one significant word (not a common business word, an English dictionary word or a word or a common Watchlist name word) that matches with a Character Match Percentage of 80 or more. The list name is not an acronym alias of a longer primary entity name.	HELICOPTERS INC
E330	Name has additional words, sounds like and substring in common	All words in the shorter entity name exist in the longer entity name (in order) after number cardinal and ordinal standardization. There is a common substring of at least 8 characters in length between the two names after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. The list name is not an acronym alias of a longer primary entity name.	NATIONWIDE SECRETARIAL SERVICES LTD NATIONWIDE SERVICES
E340	Name without business words, similar, sounds like and multiple names in common	All words in the shorter entity name match in the longer entity name (in order) after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. There are at least two significant words (not common business words) that match. The first word of each name has the same 4-character Metaphone key. The list name is not an acronym alias of a longer primary entity name.	
E350	Name without business words, similar with typos, sounds like and multiple names in common	All words in the shorter entity name match with a Character Match Percentage of 80 or more in the longer entity name (in order) after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. There are at least two significant words (not common business words) that match with a Character Match Percentage of 80 or more. The first word of each name has the same 4-character Metaphone key. The list name is not an acronym alias of a longer primary entity name.	BLACK CHAIR LTD BLACK WORLD COLLEGE OF HAIR DESIGN
E360	Name without business words has typos and sounds like	The entity names match with a Character Match Percentage of between 80 and 99 after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. The first word of each name has the same 4-character Metaphone key.	BOURNE CHIROPRACTIC LTD BARNO CHIROPRACTIC
E370	Name without suffixes contains with typos and multiple names in common	The entity names are a 'Contains' match where each word matches with a Character Match Percentage of 80 or more after number cardinal and ordinal standardization, and after common company prefixes and suffixes are removed. There are at least two significant words (not common business words) that match.  The entity names are a Contains match and the	NEW ORLEANS MEDICAB OF METRO NEW ORLEANS GROSVENOR

Group Code	Name Matching Rule	Summary of Rule Logic	Example Matching Data
	suffixes contains, similar, and multiple words in common	Word Edit Distance is no more than one between the names (where each word matches with a Character Match Percentage of 80 or more), after number cardinal and ordinal standardization, and after common company prefixes and suffixes are removed. There are at least two significant words (not common business words) that match with a Character Match Percentage of 80 or more.	NURSING SERVICES NURSING SERVICES INC
E390	Original script name has additional names with typos	All words in the shorter original script name match in the longer original script name (in order) with a Character Match Percentage of 80 or more, and there are at least two matching words.	АРАБСКИ РЕВОЛЮЦИОННИ БРИГАДИ АРАБСКИ РЕВОЛЮЦИОНИ
E400	Name has additional words and sounds like	All words in the shorter entity name exist in the longer entity name (in order) after number cardinal and ordinal standardization.	ATRIUM INCORPORATORS WORLDWIDE LTD ATRIUM
E410	Name has additional words with typos and sounds like	All words in the shorter entity name match in the longer entity name (in order) with a Character Match Percentage of 80 or more after number cardinal and ordinal standardization. The first word of each name has the same 4-character Metaphone key.	BRILLIANT GENERAL BUILDING CONTRACTOR LTD BRILLIANCE
E420	Name without business words loose match and full name sounds like	The entity names match with a Character Match Percentage of between 60 and 79 after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. The names have the same Metaphone key.	BRC PRC

## 3.3.5 Loose Entity Matching Rules

Group Code	Name Matching Rule	Summary of Rule Logic	Example Matching Data
E430	Name without business words contains, sounds like, and residual token in common	The entity names are a Contains match after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. There is at least one significant word (not a common business word, and English dictionary word or a very common word in Watchlist name data) in common between the two names. The first word of each name has the same 4-character Metaphone key. The list name is not an acronym alias of a longer primary entity name.	HENDERSON EQUITY PARTNERS GP LTD HENDERSON MANAGEMENT GROUP INC
E440	Name without business words contains, sounds like, and substring in common	The entity names are a Contains match and there is a common substring at least 8 characters in length after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. The first word of each name has the same 4-character Metaphone key. The list name is not an acronym alias of a longer primary entity name.	HAMILTON NEWS HAMILTON INVESTMENT CORP
E450	Name without suffixes starts with	The entity names are a Starts With match after number cardinal and ordinal standardization, and after common company prefixes and suffixes are removed. The list name is not an acronym alias of a longer primary entity name.	JACOB JACOBSON MANAGEMENT CO
E460	Name without business words has additional words and sounds like	All words in the shorter entity name exist in the longer entity name (in order) after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. The first word of each name has the same 4-character Metaphone key. The list name is not an acronym alias of a longer primary entity name.	IDEAL SOLUTION ESTATES MANAGEMENT LTD IDEAL ENTERPRISES INC
E470	Name without business words has additional words with typos and sounds like	All words in the shorter entity name match with a Character Match Percentage of 80 or more in the longer entity name (in order) after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. The first word of each name has the same 4-character Metaphone key. The list name is not an acronym alias of a longer primary entity name.	AVANT GARD LTD AVANTI ENTERPRISES INC
E480	Name without business words contains and sounds like	The entity names are a Contains match after number cardinal and ordinal standardization, and after common company prefixes, suffixes and other words are removed. The first word of each name has the same 4-character Metaphone key. The list name is not an acronym alias of a longer primary entity name.	MOREX TRADING LTD MOREXPRESS SA DE CV
E490	Name without suffixes starts with and allows acronyms	The entity names are a Starts With match after number cardinal and ordinal standardization, and after common company prefixes and suffixes are removed.	INTERTRADE CLASSIC LTD INTER
E500	Name without suffixes contains, significant overlap and	The entity names are a Contains match, there are at least two words that match with a Character Match Percentage of 80 or more, and the two entity names match with a Word Match Percentage of 50 or more	EG ANDG TECHNICAL SERVICES INC TECHNICAL

Group Code	Name Matching Rule	Summary of Rule Logic	Example Matching Data
	multiple words in	after number cardinal and ordinal standardization,	SERVICES
	common	and after common company prefixes and suffixes are removed.	
E510	Name contains with typos and multiple words in common	The entity names are a 'Contains' match where each word matches with a Character Match Percentage of 80 or more after number cardinal and ordinal standardization, and after common company prefixes and suffixes are removed. There are at least two words (not prefixes or suffixes) that match.	FIRSA INTERNATIONAL LTD FIRST INTERNATIONAL COMMERCE BANK LTD

## 3.3.6 Ranking matches within Entity Name rules

For each entity or vessel name matching rule, matches are ranked according to how much and how strongly additional data matches between the customer record and the watch list:

Match Rule	Summary of Matching Logic	Example Matching Data		
[Entity name rule],	At least one city matches. At least one country	City		Country
city, country	matches.	New Yor	k Londor	n GB
		London		GB US
[Entity name rule], city	At least one city matches.	City		
		Paris   London		
		Paris		
[Entity name rule],	At least one country matches.	Country		
country		US		
		PK IN US		
[Entity name rule] only	Entity name rule returns a match. No data in	Name	Country	City
	other fields.	ACM	-	-
		ACM	-	-
[Entity name rule]	Entity name rule returns a match. Data in other	Name	Country	City
(conflict)	fields does not match.	ACM	UK	London
		ACM	FR	Paris
[Vessel name rule]	At least one country matches.	Country		
country		US		
		PK IN US		
[Vessel name rule]	Vessel name rule returns a match. No data in	Name	Countr	y City
only	other fields.	Dynasty	-	-
		Dynasty	-	-
[Vessel name rule]	Vessel name rule returns a match. Data in other	Name	Country	City
(conflict)	fields does not match.	Dynasty	UK	London
		Dynasty	FR	Paris