Zygion Consulting — user manual

What every screen is for, what each button does, and what happens when you press it.

Zygion Consulting keeps the client checks that Law 129/2019 asks an accounting practice to carry out: who your client is, who really owns them, whether they appear on a sanctions list, how risky the relationship is, and the decision you took about it. It keeps the evidence behind each of those answers, and it can hand the whole file to an inspector as one document.

This manual follows the order you meet the screens in. Every picture has numbered marks on it, and the numbers are explained underneath. Where a screen refuses to do something, the manual says why, because that is usually the part people get stuck on.

The screenshots come from a demonstration firm with invented clients. No real client appears anywhere in this manual.

Who can do what

Everyone in your firm has one role, and the role decides what they see. Nobody can change their own role — only the firm owner can change anyone's.

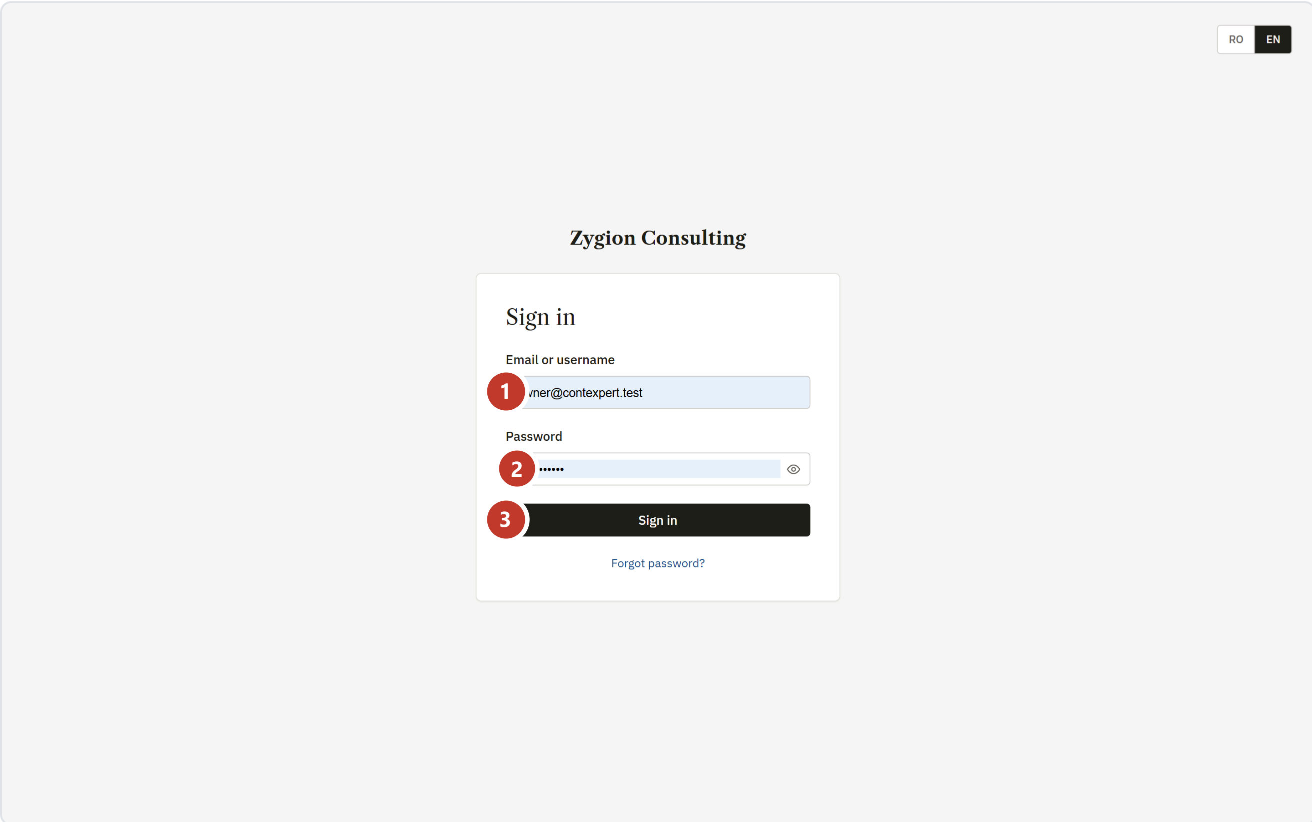
- **Firm owner.** Everything, plus the parts nobody else can touch: inviting people, changing roles, the firm's own details, the risk model and the review policy.
- **Compliance officer.** The KYC work: opening files, recording people and owners, running screening, assessing risk, approving or refusing, and producing the dossier. Can see the full personal numbers when there is a reason to.
- **Accountant.** Can see clients and their files and do the day-to-day recording, but cannot approve a file, cannot see full personal numbers, and cannot produce a dossier.
- **Auditor.** Reads. Sees the files and the audit trail, changes nothing.

> **If a button is missing**
>
> The interface hides what your role may not do rather than showing it greyed out, so a colleague's screen can have buttons yours does not. That is normal. If you need something you cannot see, ask the firm owner to change your role.

Signing in

The address your firm was given

You get into Zygion Consulting with the e-mail address you were invited on. The invitation arrives once, with a link that lets you set your own password; the link is good for seven days. If it has run out, ask the firm owner to send it again — nobody, including us, can see or set your password for you.



1. Your e-mail address — the one the invitation was sent to.
2. Your password. You chose it when you opened the invitation.
3. Signs you in. Five wrong passwords in a row lock the account for a while; that is deliberate.

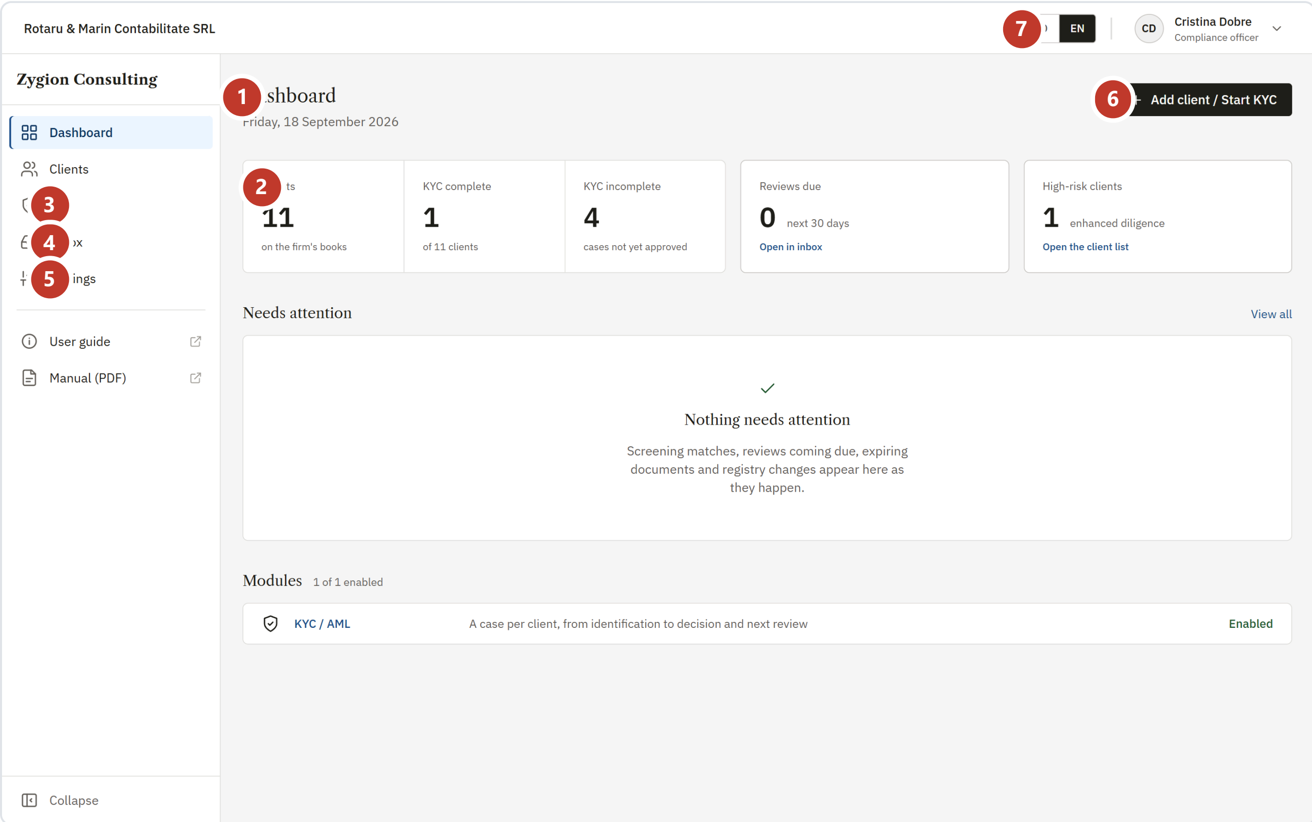
If you cannot get in

- **Forgotten the password.** Use the link under the form. You are sent a fresh link whether or not the address is known to us, so the page never tells a stranger which of your colleagues has an account.
- **Five wrong tries.** The account locks itself for a while. Waiting is enough; the firm owner can also unlock it straight away.
- **The e-mail has not arrived.** Look in the spam folder before asking for another one.

The dashboard

The first page after signing in

The dashboard answers one question: what needs doing today. If nothing does, it says so plainly rather than inventing work.



1. The **dashboard**: what needs your attention today.
2. **Clients**: every company and every person your firm works for.
3. **KYC**: the checking files. One file per client relationship.
4. **Inbox**: messages from the system itself — an e-mail that could not be delivered, a check that failed.
5. **Settings**: your firm, the people in it, the risk model and the audit trail.
6. The quickest way in: adds a client, or opens a checking file for one you already have.
7. Switches the interface between Romanian and English. The page reloads.

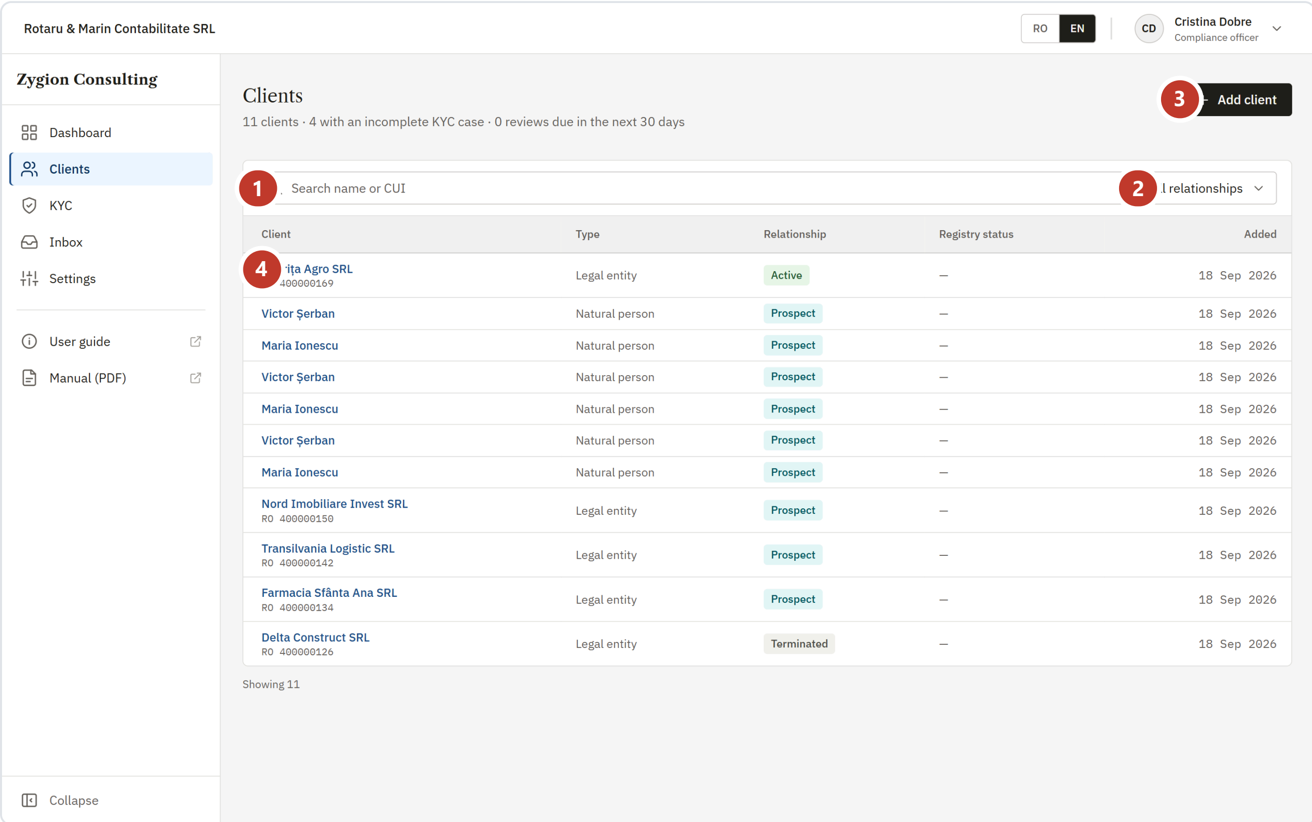
The two counts

Reviews due counts the clients whose file is due to be looked at again in the next thirty days. **High-risk clients** counts the ones whose last assessment came out high, which is the group the law expects you to watch more closely. Both are links: they take you to the list behind the number.

The client list

Clients

Every company and every private person your firm works for. The search box looks at names and tax numbers, and it only ever searches inside your own firm — no firm can see another firm's clients.



1 Searches by name or tax number. It looks only inside your own firm.

2 Narrows the list to prospects, active clients, or ones you have stopped working for.

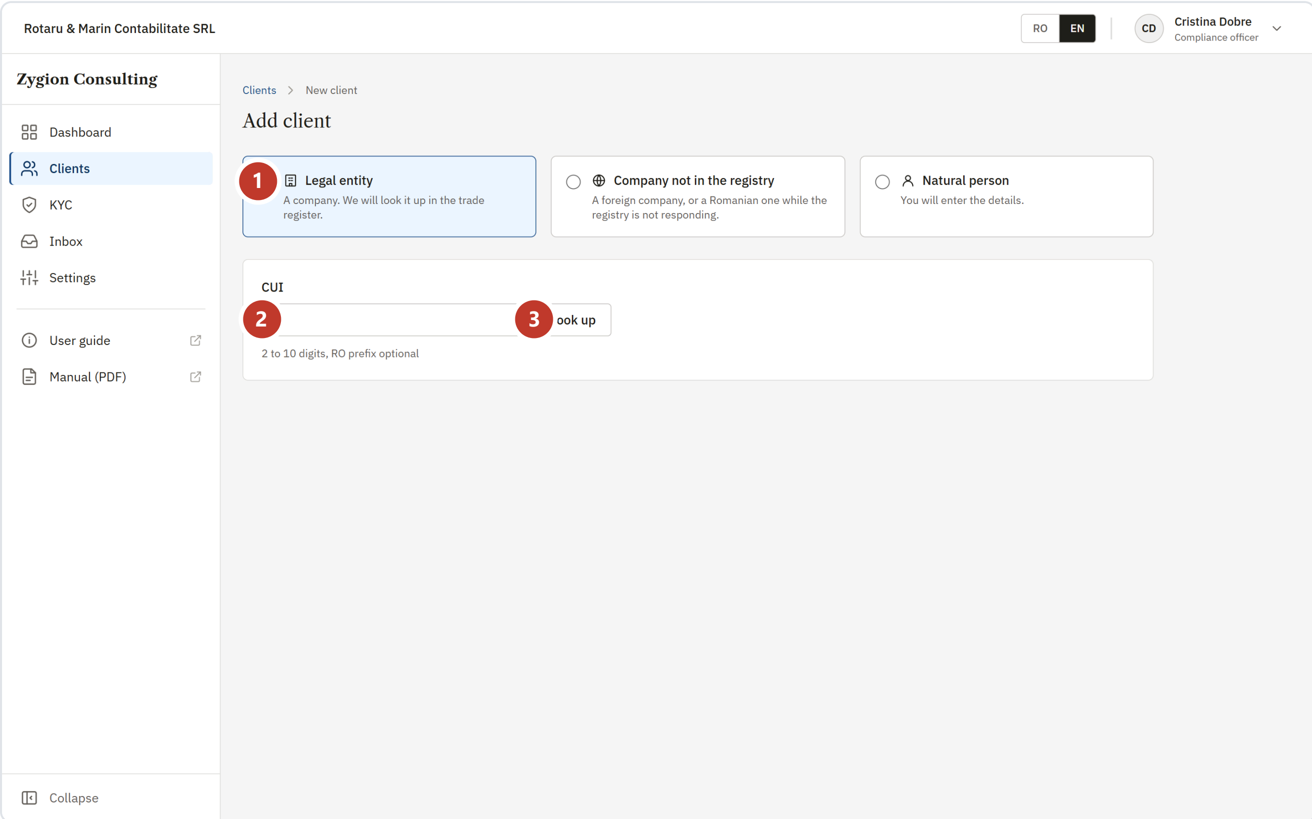
3 Adds a new client.

4 Opens the client record. The name is a link on every row.

Adding a client

Clients → Add client

Type a company's tax number and Zygion Consulting asks the public registers for it. You are shown what came back before anything is saved, so you can check it is the right company. Each detail is stored with a note of where it came from and when, which is what lets you show later that you did not simply type it in yourself.



1. A company or a private individual. The form changes to match.
2. The tax number (CUI). Type it with or without the RO in front.
3. Looks the company up in the public registers and shows you what it found before anything is saved.

When the register cannot answer

The registers are occasionally down, and some companies are not in them. You can then add the client by hand, but you must give a reason, and that reason is kept with the record. A client added by hand is marked as such, so nobody later mistakes your typing for an official answer.

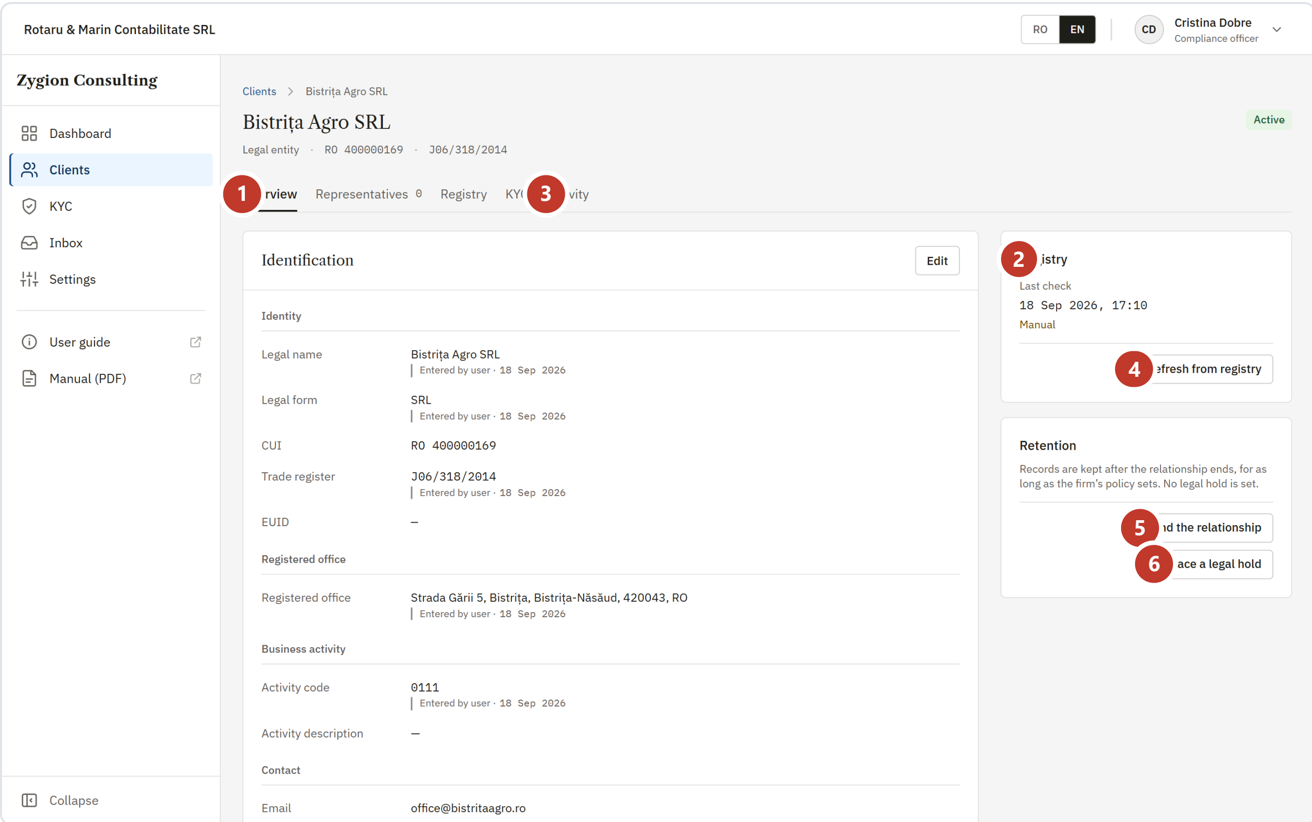
A private person

For a private client there is no register to ask. You record the name and the contact details, and the identity details go on the KYC file itself, together with the document you checked them against.

One client

Clients → any name

Everything known about one client, in tabs. **Overview** is the identity; **Registry** is what the public register said and when it was last asked; **KYC** lists the checking files; **Activity** is the history of the record itself.



1. Who the client is: name, tax number, address, line of business, contact details.
2. What the public register said, and when it was last asked.
3. Everything that has been done to this record, with who did it and when.
4. Asks the register again. If anything has changed you are shown the difference and decide whether to accept it.
5. Marks the client as no longer yours. The file is kept for the years the law requires, then removed.
6. Stops that removal — use it when an authority or a court has asked for the file.

Refreshing from the register

A refresh does not overwrite anything. If the register now disagrees with what you hold — a new address, a new name — you are shown the two versions side by side and you decide, field by field, what to accept. What you accept is recorded as your decision, not as an automatic change.

Ending a relationship, and the legal hold

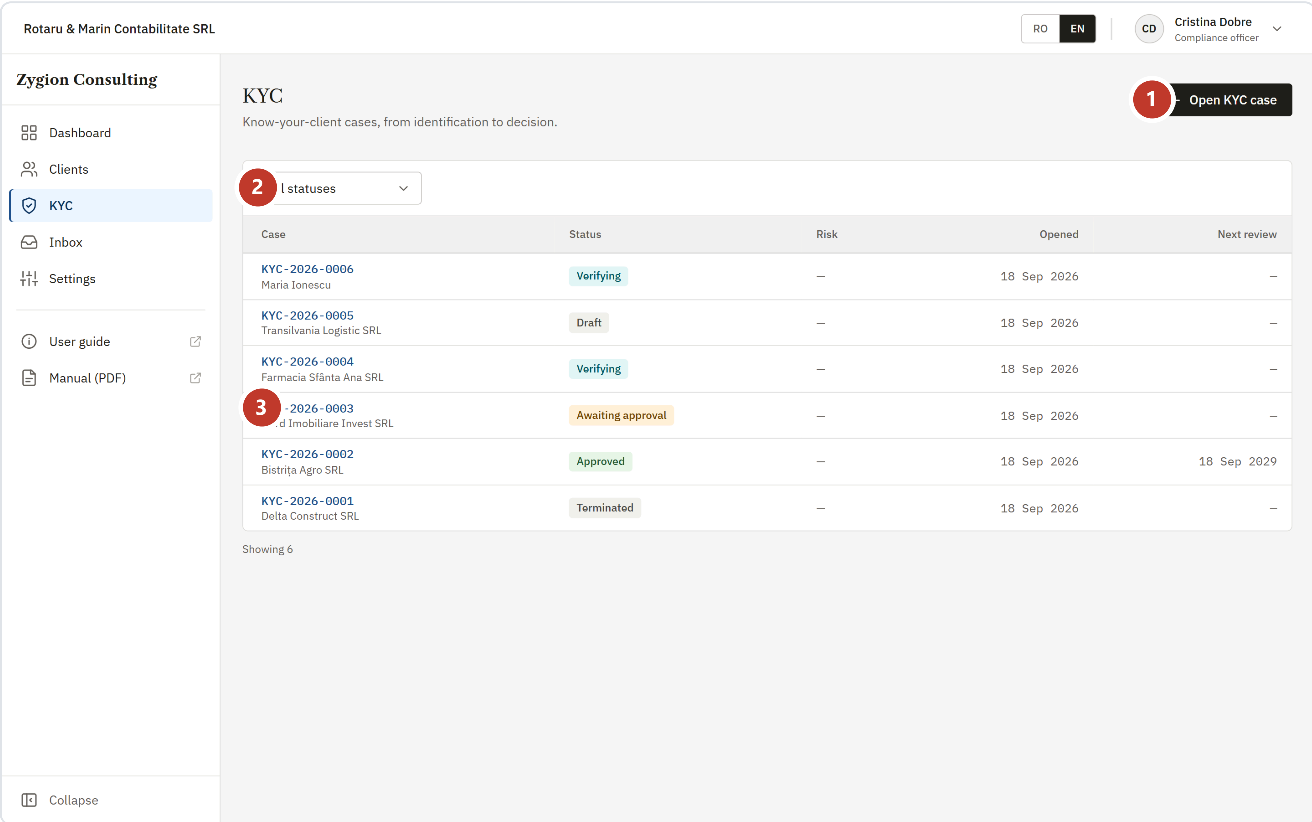
When you stop working for a client, mark the relationship ended. The file is then kept for the five years the law requires, counted from that day, and after that the personal details are removed while the fact that the client existed and what you decided stays.

A legal hold stops that removal. Use it when an authority, a court or an investigation has asked for the file. It stays until you take it off.

The KYC files

KYC

One file per client relationship. The number in front (KYC-2026-0003) is how you refer to it in a letter or on the telephone. The list can be narrowed to one stage, which is the quickest way to find everything waiting for a decision.



1 Starts a new checking file for a client.

2 Shows only the files at one stage — the ones waiting for a decision, for instance.

3 The file number. Click it to open the file.

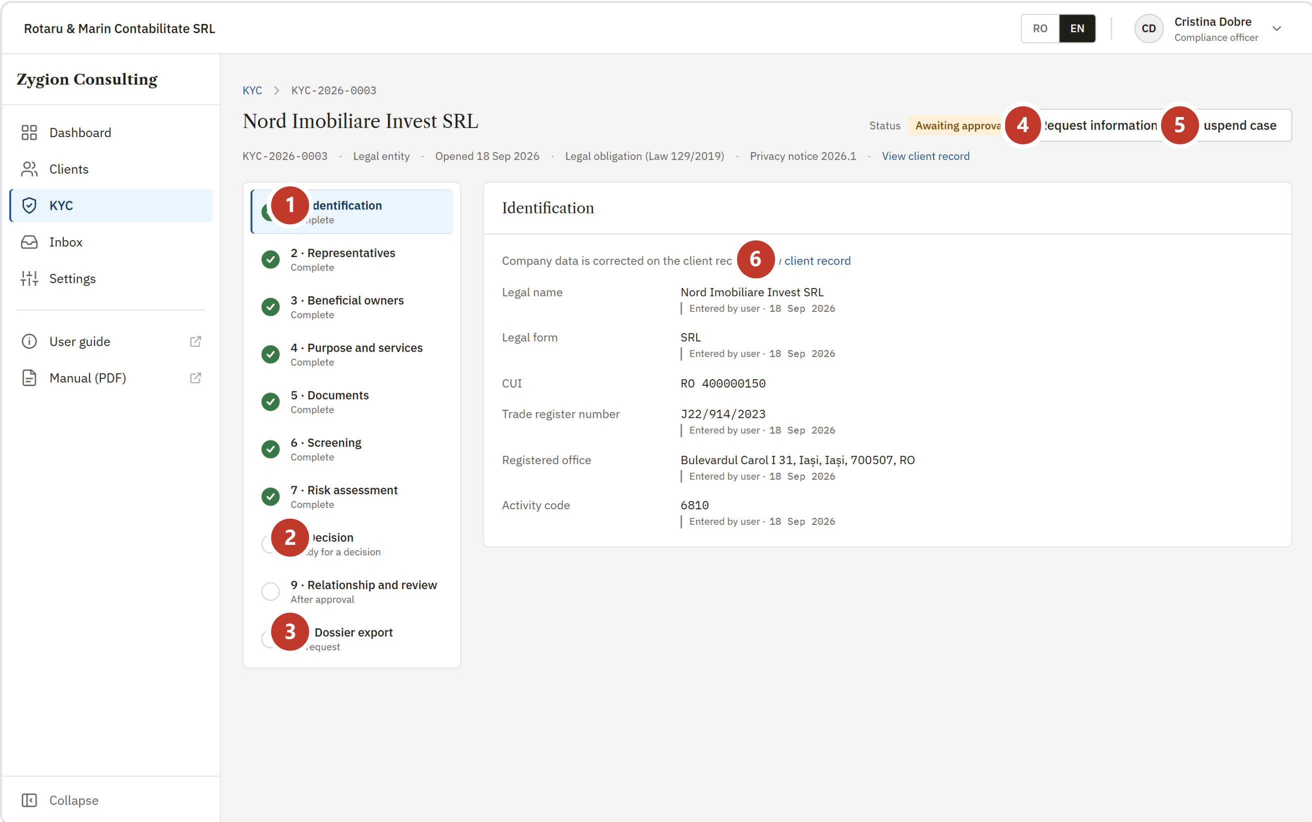
What the stages mean

- **Draft** — opened, nothing recorded yet.
- **Awaiting information** — you have asked the client for something and are waiting.
- **Verifying** — you are checking what you have.
- **Risk review** — the checks are done and the risk is being assessed.
- **Awaiting approval** — everything is ready and someone has to decide.
- **Approved** / **Rejected** — decided, with the reason recorded.
- **Review due** — an approved file that is old enough to be looked at again.
- **Suspended** / **Terminated** — parked, or closed for good.

A file, and its ten steps

KYC → any file number

A file is ten steps down the left-hand side. You can work on them in any order; each one keeps its own state, so the list tells you at a glance what is done and what is missing. The decision at step 8 is the only one that waits for the others.



1. Step 1 — who the client is. Each step carries its own state: complete, missing something, or not needed.
2. Step 8 — the decision. It stays shut until the steps above it are done.
3. Step 10 — the file you hand to an inspector.
4. Puts the file on hold because something is missing from the client.
5. Parks the file. Nothing is lost; it can be picked up again.
6. Jumps to the client behind this file.

The steps

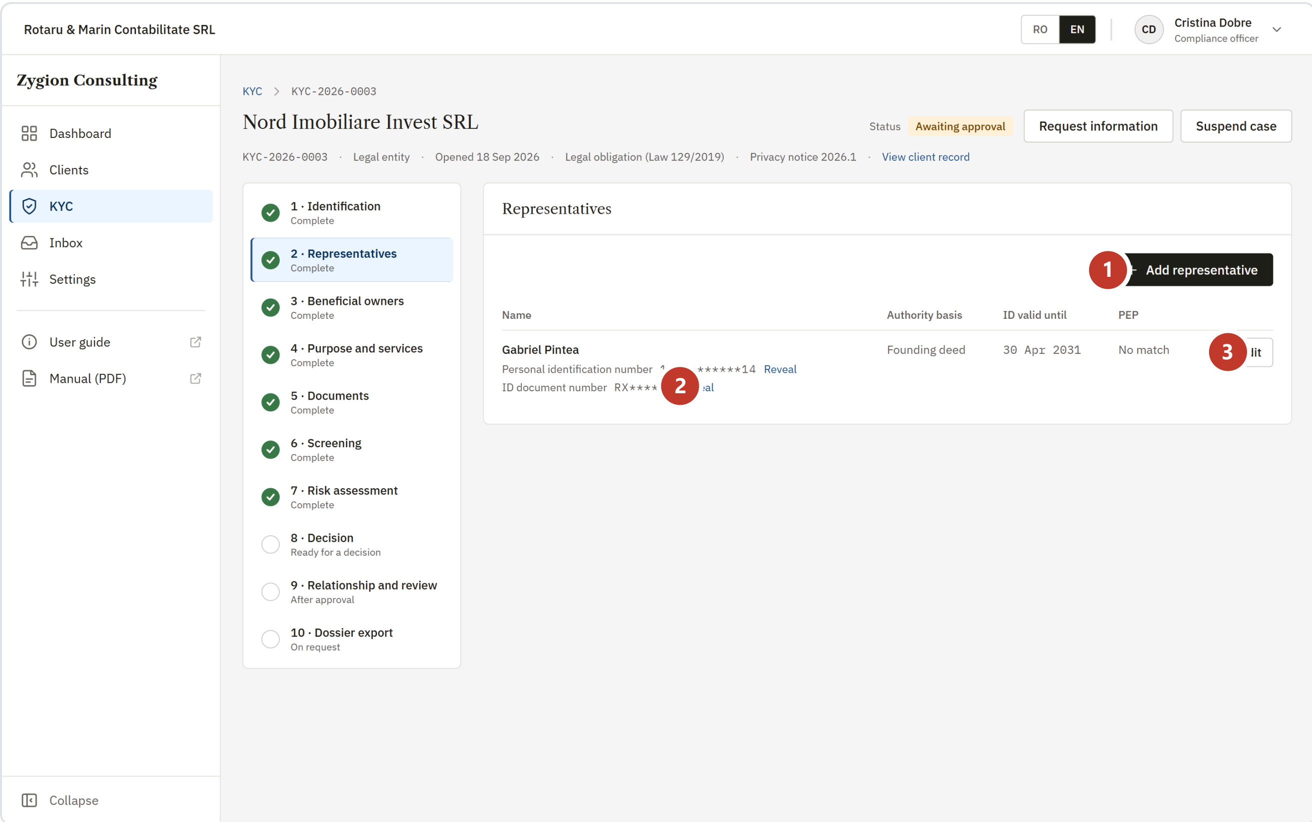
- **1 Identification** — who the client is.
- **2 Representatives** — the people who act for the client.
- **3 Beneficial owners** — who really owns or controls it.
- **4 Purpose and services** — what the relationship is for.
- **5 Documents** — the evidence.

- **6 Screening** — sanctions and politically exposed persons.
- **7 Risk assessment** — the score and the level.
- **8 Decision** — approve, approve with extra measures, ask for more, or refuse.
- **9 Relationship and review** — when the file is next looked at.
- **10 Dossier export** — the file as one document.

Step 2 — representatives

A file → 2 · Representatives

The people who act for the client: the administrator, whoever signs, whoever gives you instructions. For each one you record the name, the date of birth, the personal number and the identity document you saw, and you say where you got it from — the document itself, a register, or another source you trust.



1 Records another person who acts for the client.

2 Shows the personal number in full. Only some roles have this, and every use is written to the audit trail.

3 Corrects what was recorded. The earlier version is kept, not overwritten.

The personal number is checked

A Romanian personal number (CNP) has a check digit, and Zygion Consulting works it out. If the number is refused it has been mistyped; it is not a rule you can wave through.

Who can read it afterwards

Once saved, the number is stored encrypted and shown to most people as dots with the last digits. Someone with the right to see it in full can reveal it, and every reveal is written to the audit trail with their name against it.

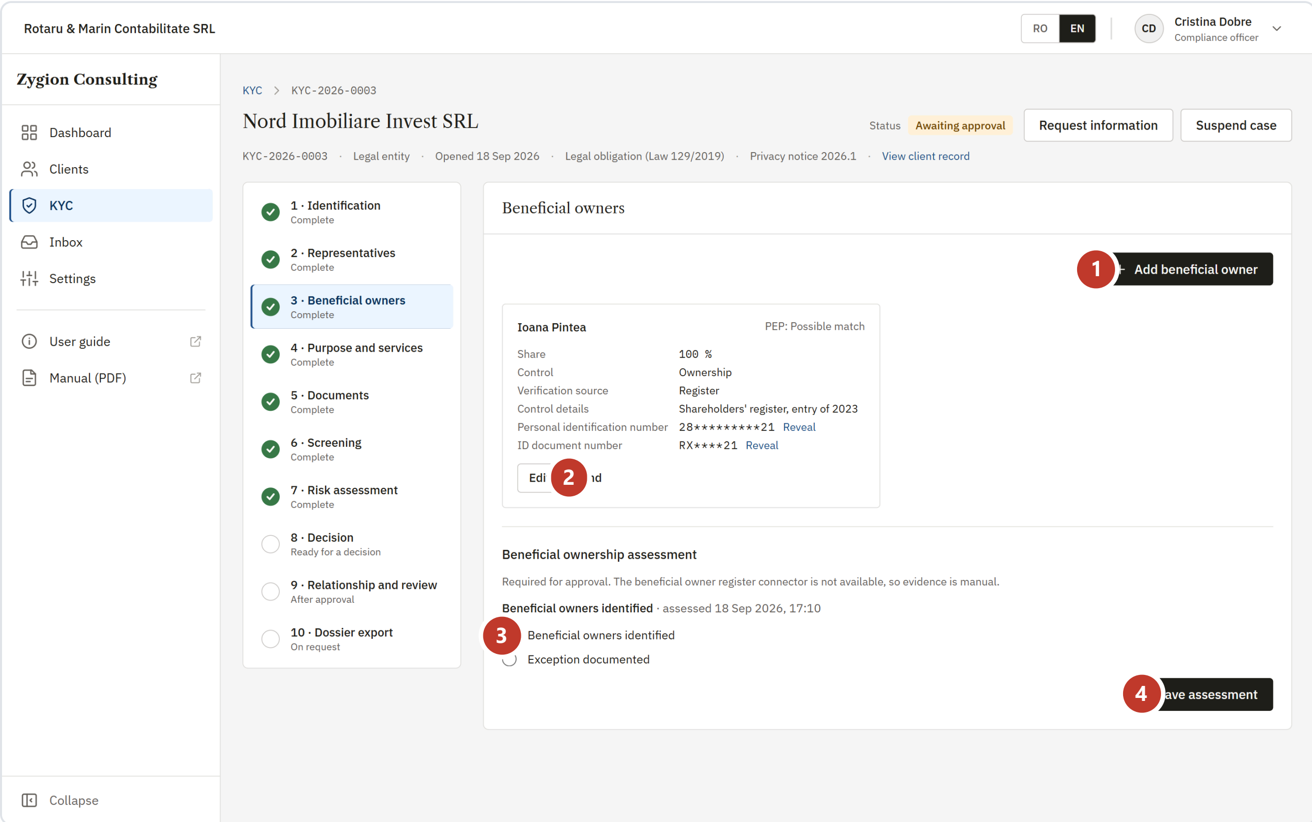
Politically exposed persons

For each person you say whether they hold, or are close to someone who holds, a public office. Answering yes does not stop anything — it raises the risk score and the file then expects enhanced measures at the decision.

Step 3 — beneficial owners

A file → 3 · Beneficial owners

The real owners behind the company: the people, not the companies in between. Record each one with their share, or with the kind of control they have where it is not a shareholding.



1. Records a real owner: a person, with their share or the control they hold.
2. Marks an owner as no longer one, from a date. The history stays.
3. Either you identified the owners, or you are falling back on the senior managing official and saying why.
4. Records the conclusion. Changing the people afterwards sends this step back to unfinished.

When you cannot find one

Sometimes no individual reaches the threshold and there is no other controller. The law lets you fall back on the senior managing official, and Zygion Consulting lets you record that — but it asks you to write down why, and the file keeps that note. This is the part inspectors read first.

Shares must add up

The recorded shares cannot exceed 100%. If they do, the entry is refused rather than saved and forgotten about.

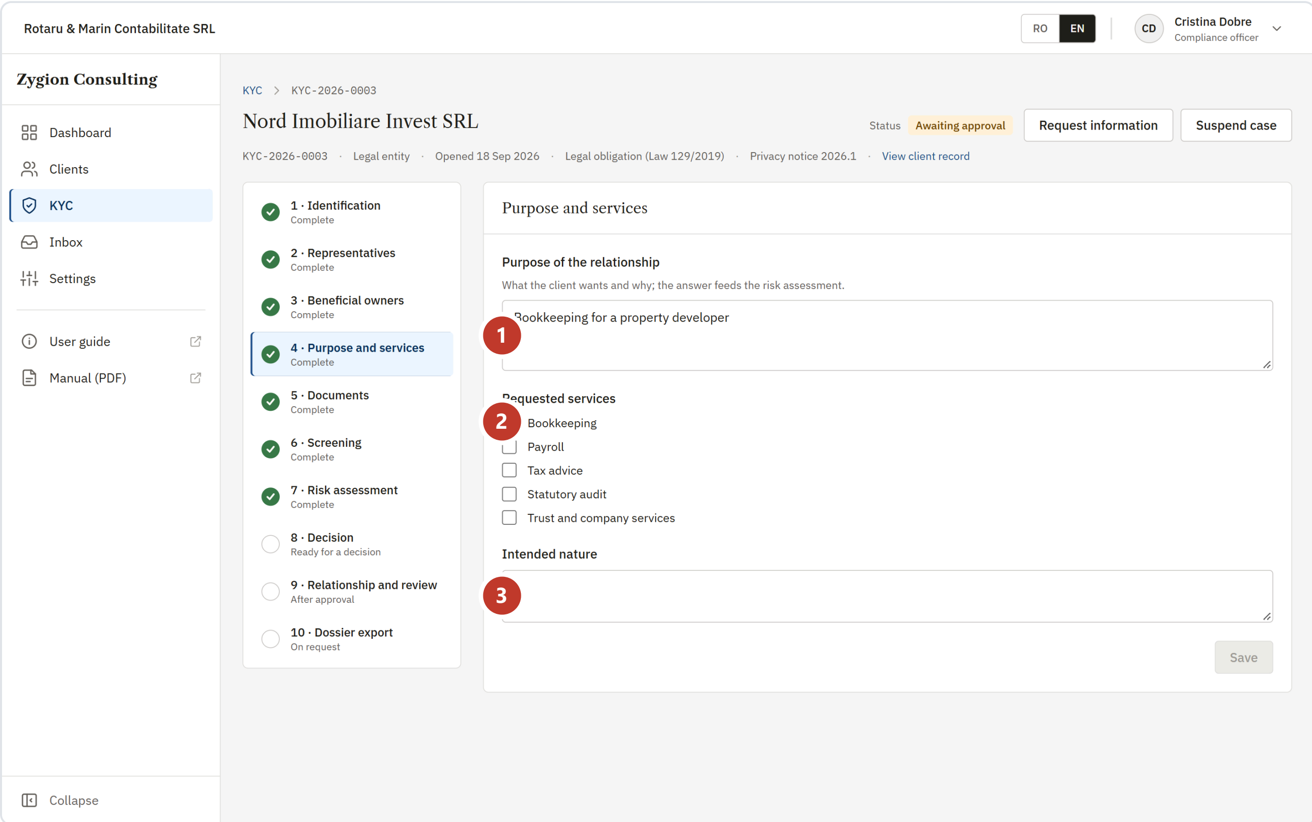
Changing the owners reopens the question

If you add, change or remove a person after the ownership has been assessed, the assessment goes back to unfinished and the file can no longer be approved until you have looked at it again. That is deliberate: an approval should not rest on a picture of the ownership that has since changed.

Step 4 — purpose and services

A file → 4 · Purpose and services

What the client wants from you — bookkeeping, payroll, tax returns — and what the relationship is for. It sounds like paperwork, but it feeds the risk assessment, and it is the answer to an inspector asking why you were working for this client at all.

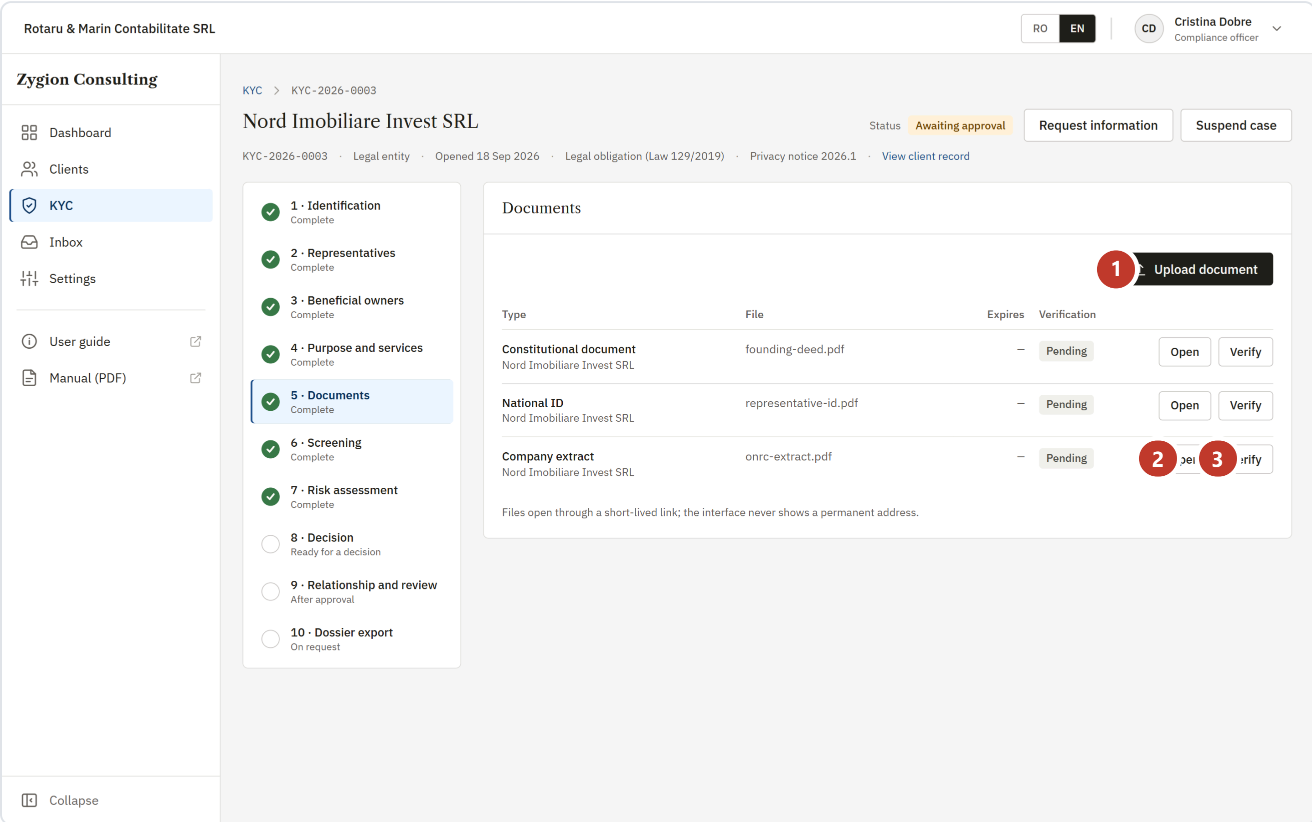


1. Why the client came to you, in your own words.
2. The services you will provide. These feed the risk assessment.
3. What you expect the relationship to look like — how often, how large, what kind of transactions.

Step 5 — documents

A file → 5 · Documents

The evidence: the register extract, the founding deed, the identity documents. Choose what the document is, then upload the file. Zygion Consulting works out a fingerprint of what was uploaded and stores it with the document, so you can show years later that the copy in the dossier is the copy you took.



1. Adds evidence: say what the document is, then choose the file.
2. Downloads the file through a link that works for a few minutes. Each download is recorded.
3. Marks the document as checked by you. Until then it does not count towards the file being complete.

Uploaded is not the same as checked

A document arrives as "pending" until someone marks it verified. Only then does it count towards the file being complete. An expiry date on an identity document is watched: when it passes, the file is flagged for a review.

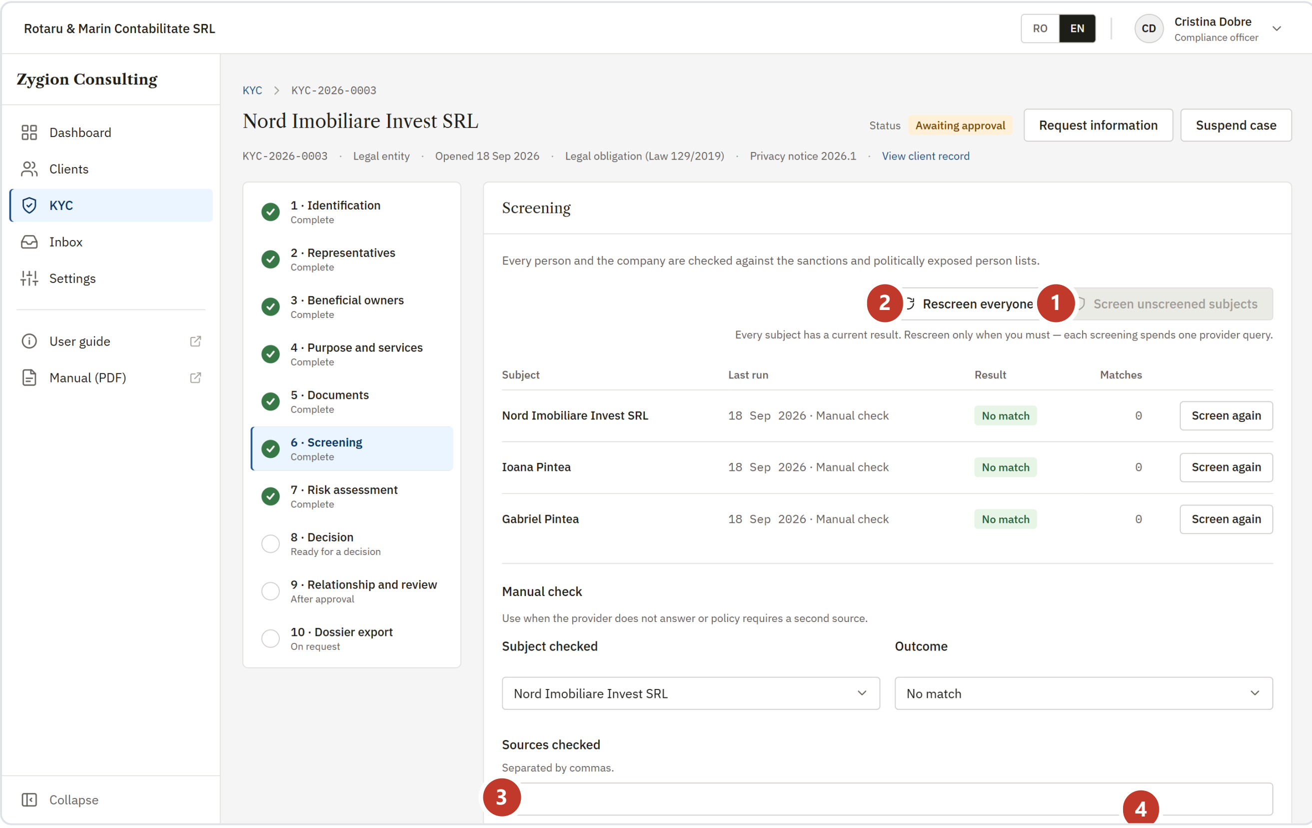
Downloading

Documents are not served straight from the page. A download gives you a link that works for a few minutes and then stops, and each download is recorded with your name. If a link has expired, ask for it again.

Step 6 — screening

A file → 6 · Screening

Screening asks whether the company or any of the people on the file appear on a sanctions list or are politically exposed. Run it and the answer comes back per subject, with the lists that were searched and the day they were published.



1 Checks anyone added since the last run — the usual button after adding a person.

2 Runs the whole file again, for instance when the lists have been updated.

3 When the service cannot be reached: name the lists you checked by hand.

4 Saves a check you made yourself. It counts exactly like an automatic one, hit or no hit.

A possible match is not a match

Names repeat, and the lists are deliberately generous. Anything the system is unsure about comes back as a possible match for you to look at. You either dismiss it as a different person, giving your reason, or confirm it. The file cannot be approved while a possible match is sitting there undecided.

A confirmed match stops everything

If a subject really is on a sanctions list, the file cannot be approved at all. There is no override for this one, because there is no lawful way to approve it.

When the list service is unavailable

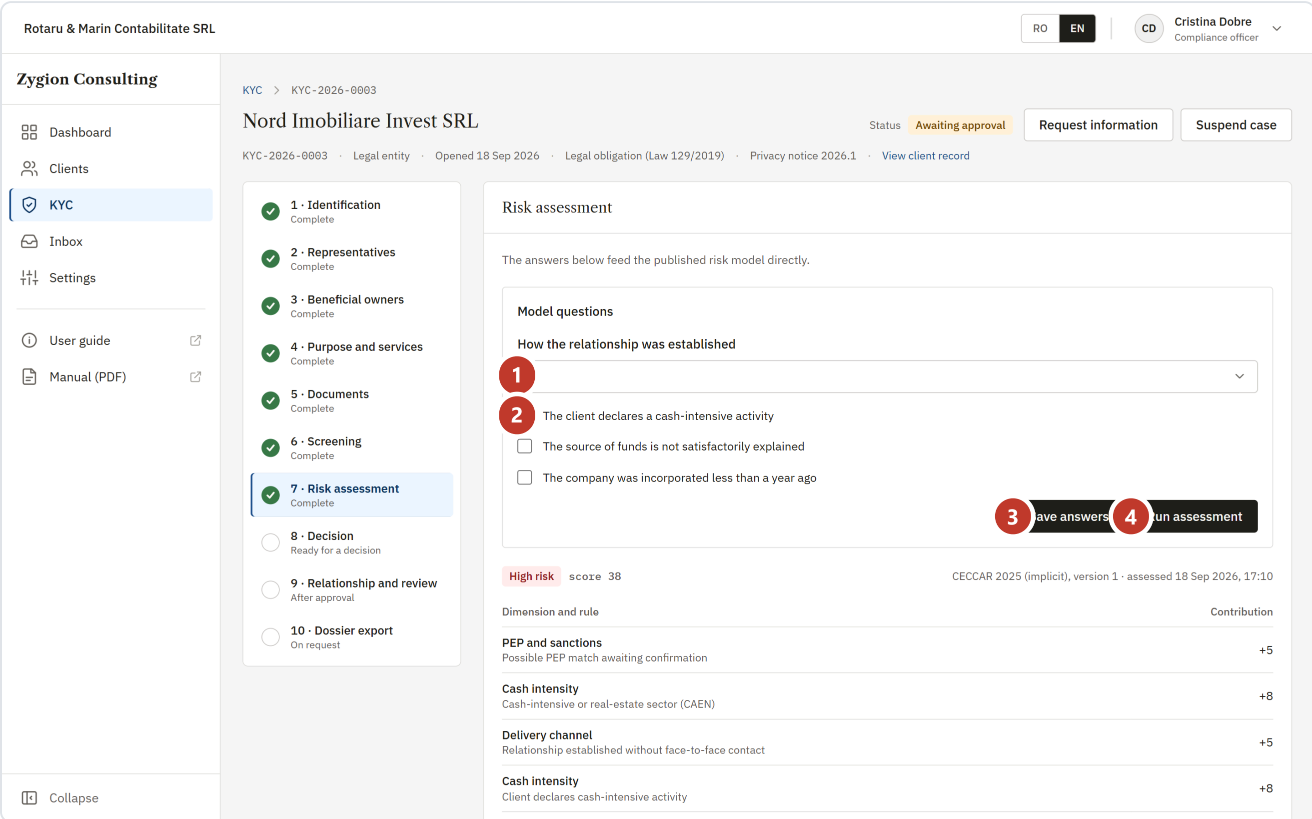
If the service cannot be reached, the file does not quietly pass. You can record that you checked the lists yourself, naming which ones and what you found, and that hand-recorded check counts exactly like an automatic one — including when what you found was a hit, which blocks the approval just the same.

> **Adding a person means screening again**
>
> A screening covers the people who were on the file when it ran. Add a representative or an owner afterwards and the step goes back to incomplete, because nobody has checked the new person yet.

Step 7 — risk

A file → 7 · Risk assessment

A short questionnaire — how the client came to you, whether the business is cash-heavy, how new the company is, whether the source of funds is clear — and the model turns the answers into a score and a level: low, medium or high. Each point is shown with the rule that awarded it, so you can see exactly why a client came out high.



1. How the relationship was established. Never meeting the client in person adds risk.
2. Cash-heavy business, unclear source of funds, a very new company — each adds points.
3. Keeps the answers without scoring anything yet.
4. Produces the score and the level, and lists which rule awarded each point.

Overriding the level

You can set a different level from the one the model produced, but only with a written reason, and both the model's answer and yours are kept. An inspector sees the disagreement and your explanation of it.

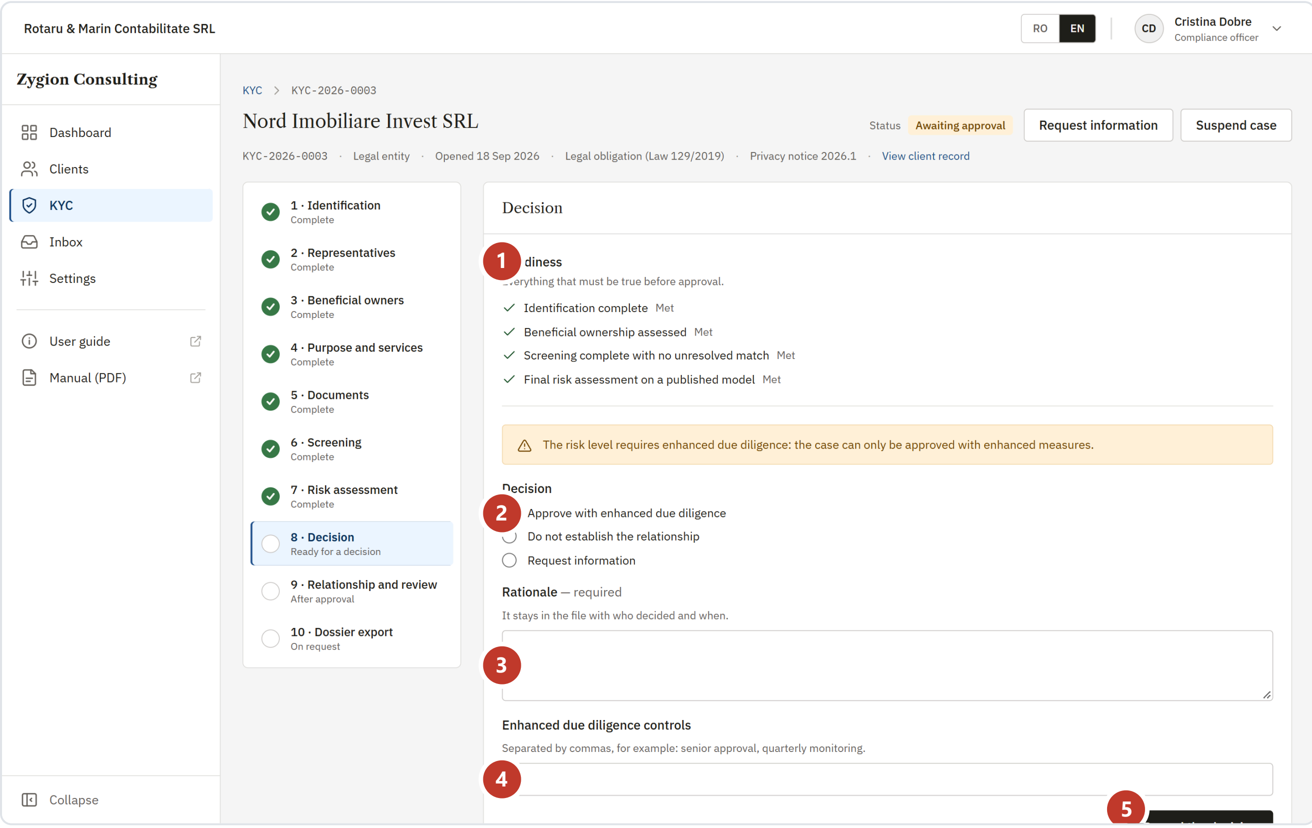
The model is versioned

The assessment records which version of the risk model produced it. Change the model later and old assessments keep saying what they said at the time, which is the only way an old decision stays explainable.

Step 8 — the decision

A file → 8 · Decision

The decision is the point of the whole file. Before you can take one, the screen lists what is ready and what is not, and the button stays shut until the list is clear.



1. What is done and what is still missing. While anything here is unmet, the decision cannot be recorded.
2. Approve, approve with enhanced measures, ask the client for more, or refuse.
3. Your reasoning. This is the part an inspector reads.
4. The extra controls you will apply, when the decision is an approval with enhanced measures.
5. Writes the decision, with the risk model version and policy version in force at that moment.

What has to be in place

- The client and the people on the file are identified, with documents.
- The beneficial ownership has been assessed — and assessed against the people who are on the file now.
- Screening has been done for every subject, with nothing left undecided.
- A risk assessment exists.

The four decisions

- **Approve** — the relationship can go ahead.
- **Approve with enhanced measures** — go ahead, but with the extra controls you list. This is what a high-risk client normally gets.
- **Ask for more information** — the file goes back to waiting, and the client is what you are waiting on.
- **Refuse** — with the reason, which is kept.

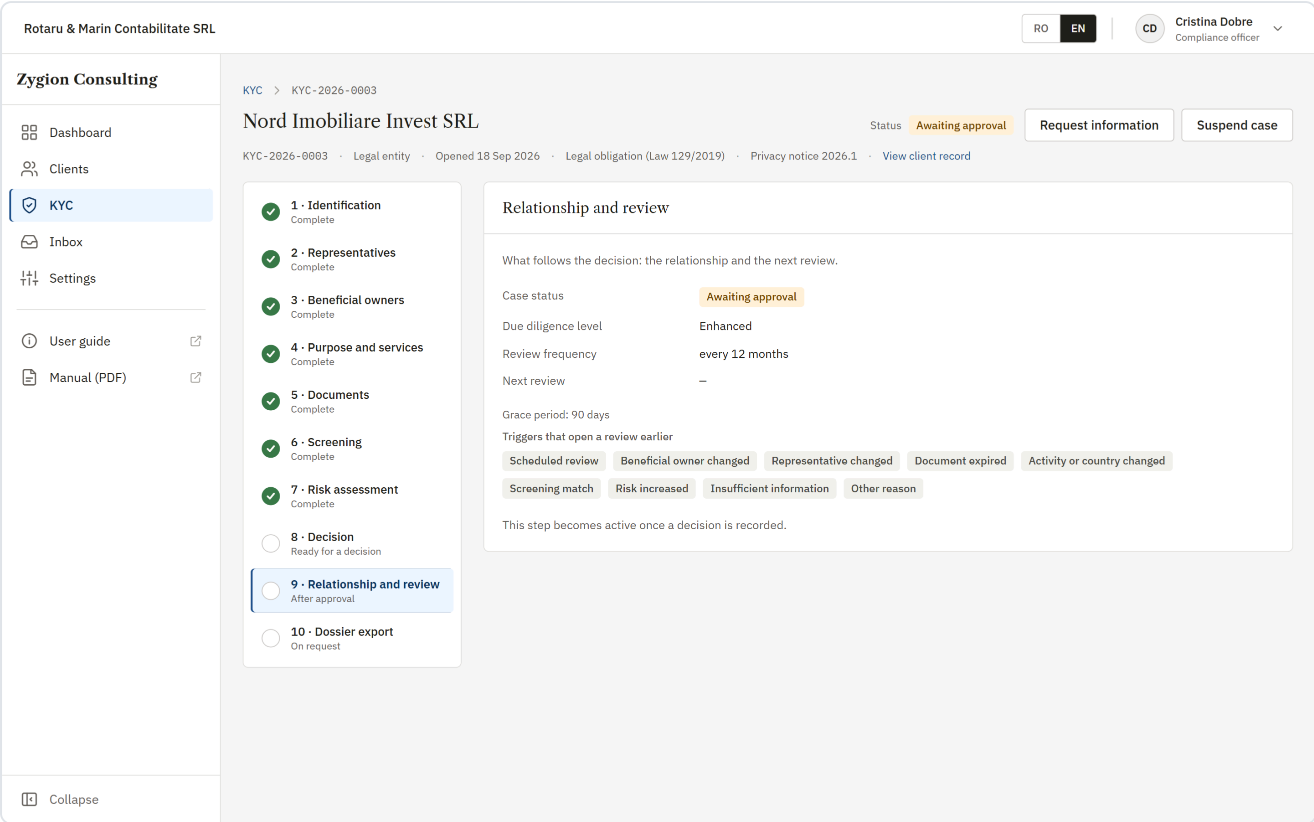
Overriding a blocker

Someone with the right to override can approve past some of the blockers, with a written reason. The decision then records which rules were overridden, who did it and why. A confirmed sanctions match is never in that group.

Step 9 — relationship and review

A file → 9 · Relationship and review

An approval is not forever. This step sets when the file is next looked at — sooner for a high-risk client, later for a low-risk one — and the dashboard counts the ones that are coming due.



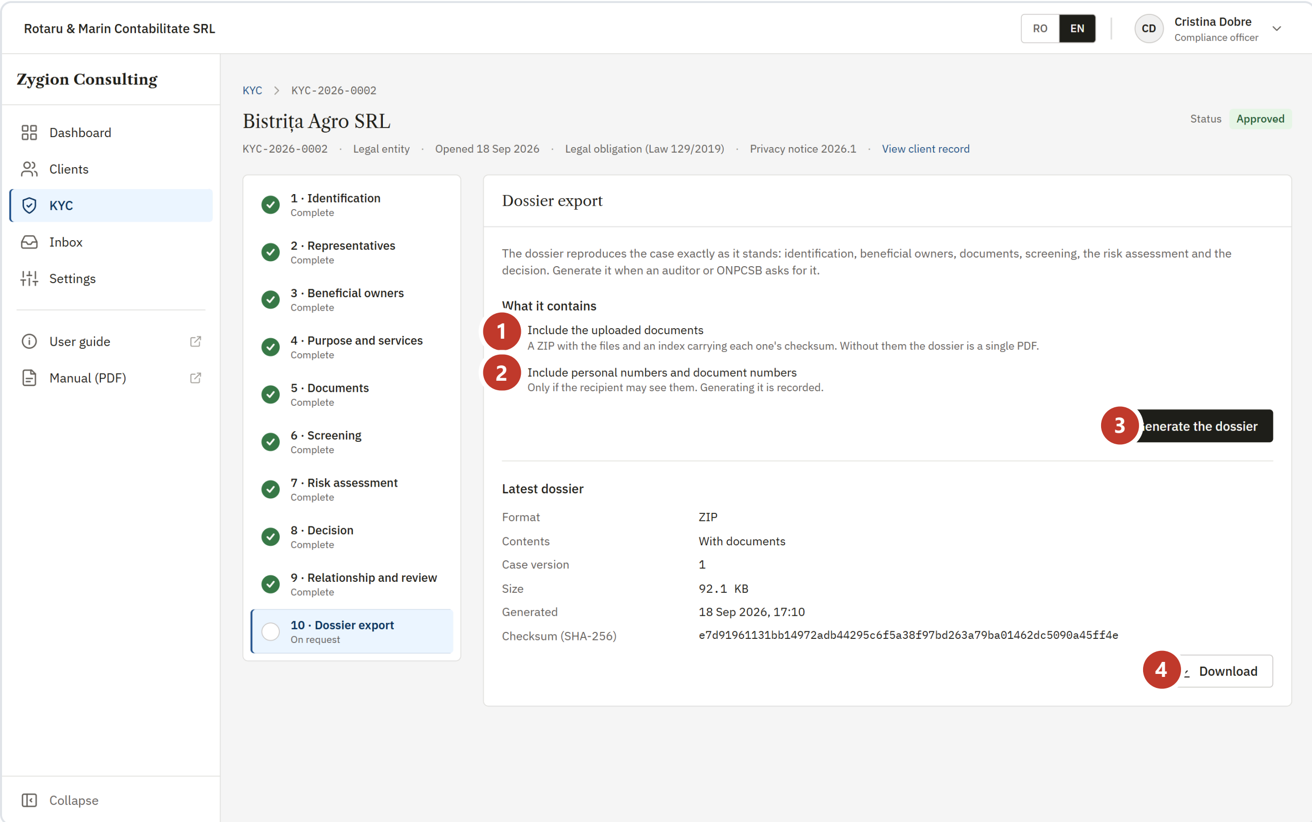
What a review does

Opening a review does not touch the approved file. It creates a new file alongside it, carrying everything forward, so the old decision stays exactly as it was taken and the new one is recorded separately. A review can be started by the calendar, or by something happening: an owner changing, a document expiring, a screening match, the risk going up.

Step 10 — the dossier

A file → 10 · Dossier export

This is what you hand to an inspector. It produces one archive holding a readable summary of the file — the client, the people, the owners, the screening, the risk, the decision and the reasons — and, if you ask for them, the documents themselves.



1. Include the uploaded documents themselves, not only the summary.
2. Include full personal numbers. This choice only appears if your role may see them.
3. Builds the archive from the file as it stands now.
4. Fetches the archive through a short-lived link.

What is recorded about the copy

- **Contents** — whether documents and full personal numbers are inside.
- **Case version** — which version of the file it was taken from.
- **Checksum** — a fingerprint of the archive. Keep it: it is how you show, years later, that the copy in front of you is the copy that was produced.
- **Generated** — when, and by whom, in the audit trail.

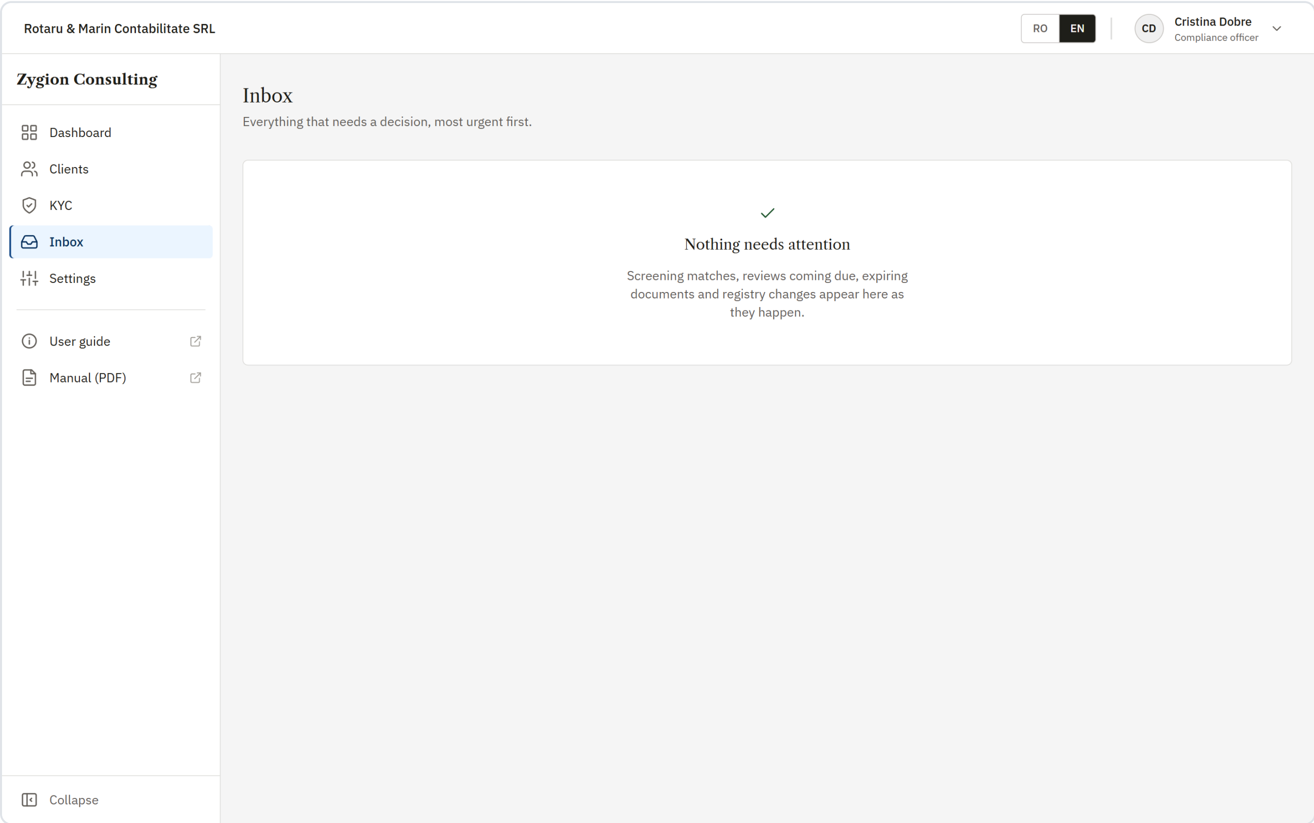
Who can produce one

Producing a dossier needs the export right, which the firm owner and the compliance officer have and an accountant does not. Including the full personal numbers needs a second right on top of that, so an export that would reveal them is refused rather than quietly stripped.

The inbox

Inbox

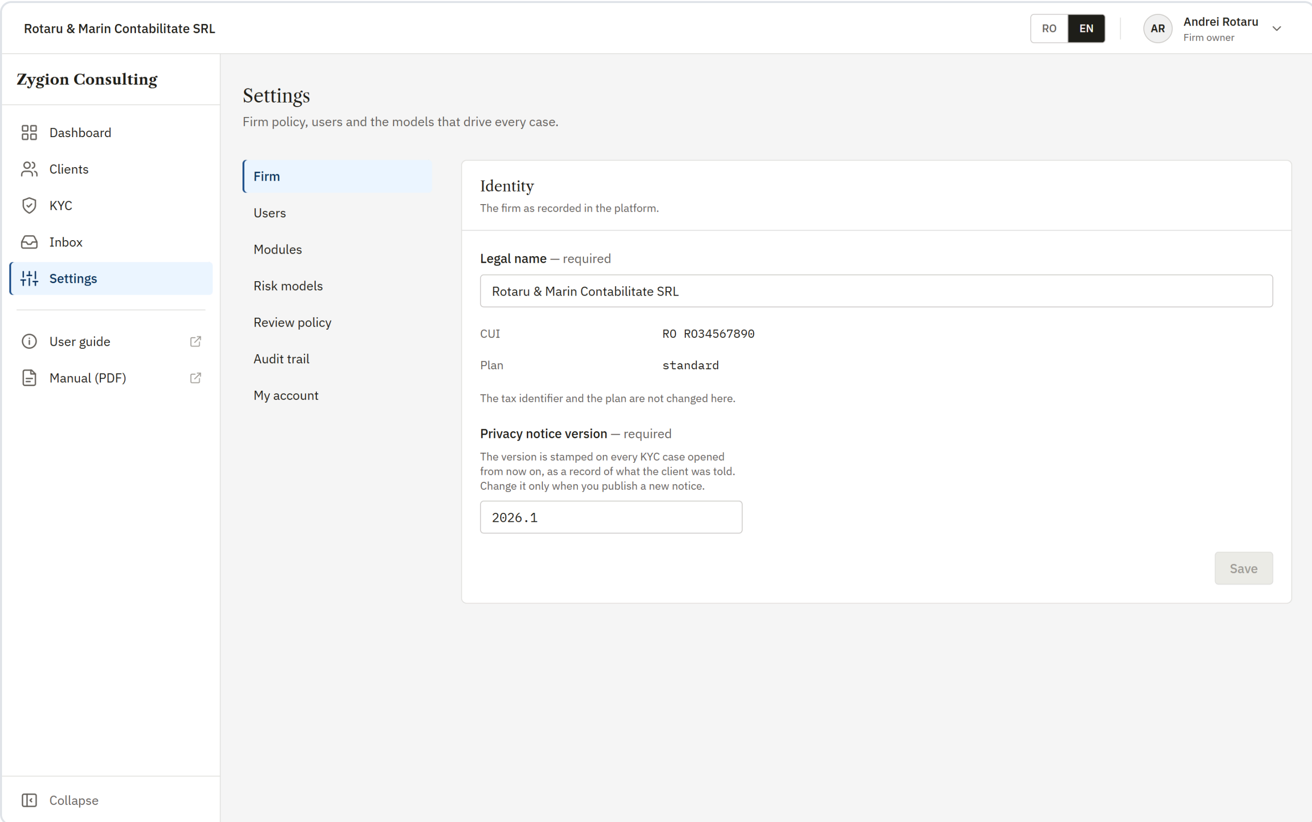
Messages from the system rather than from a person: an e-mail to a colleague that could not be delivered, a check that failed and needs running again. Each one says what happened and what is affected. An empty inbox means nothing has gone wrong, which is the normal state.



Settings

Settings

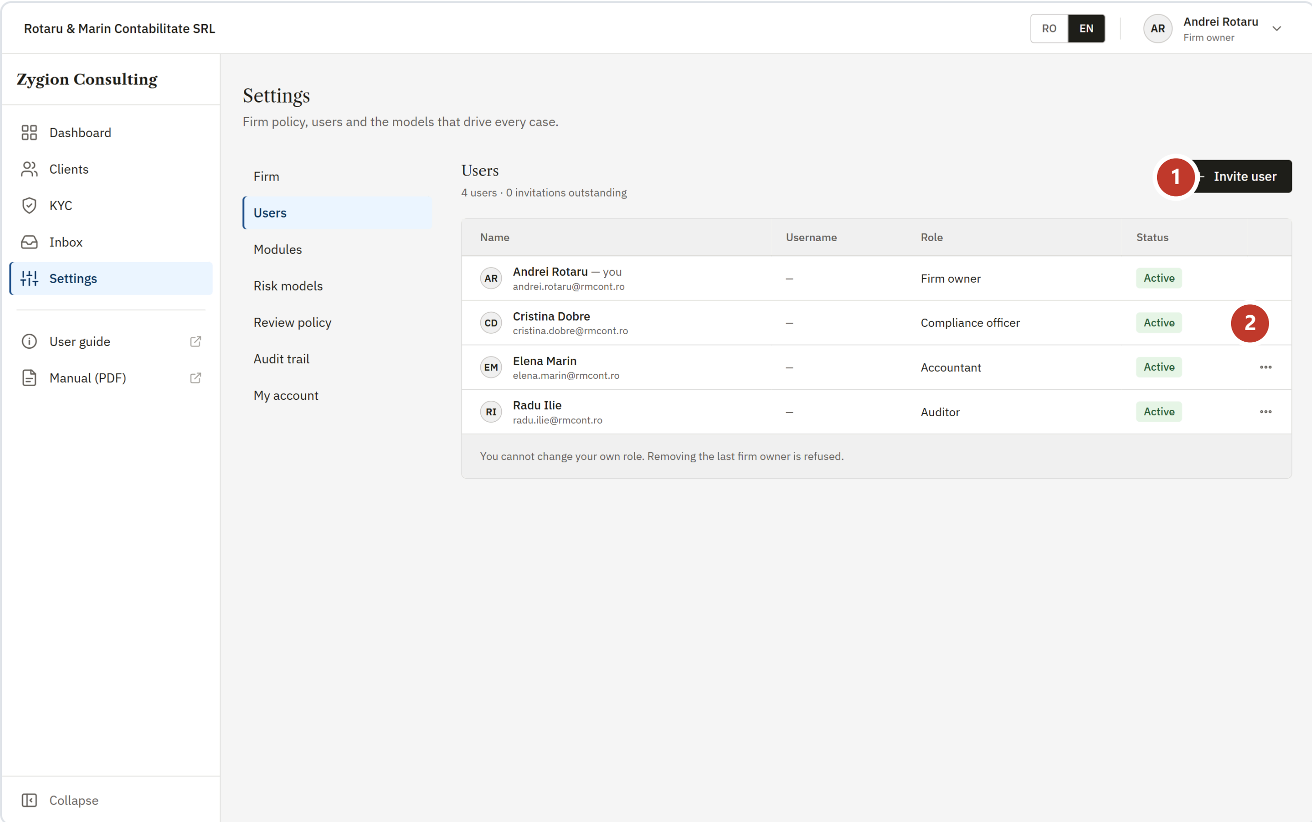
Settings holds the things that are true of your whole firm rather than of one client. Most of it is the firm owner's to change; everyone else can look at their own account.



People in the firm

Settings → Users

Invite a colleague by e-mail address and role. They get a link that lets them set their own password — you never choose it for them. An invitation lasts seven days and can be sent again if it is missed.



1. Sends an invitation. You choose the address and the role; they choose the password.
2. Change someone's role, send the invitation again, deactivate them, or unlock a locked account.

Changing and removing

A role can be changed at any time and takes effect the next time the person loads a page. Someone who has left is deactivated rather than deleted, so the audit trail still shows who did what. A firm cannot be left without an owner, so the last one cannot be removed or demoted.

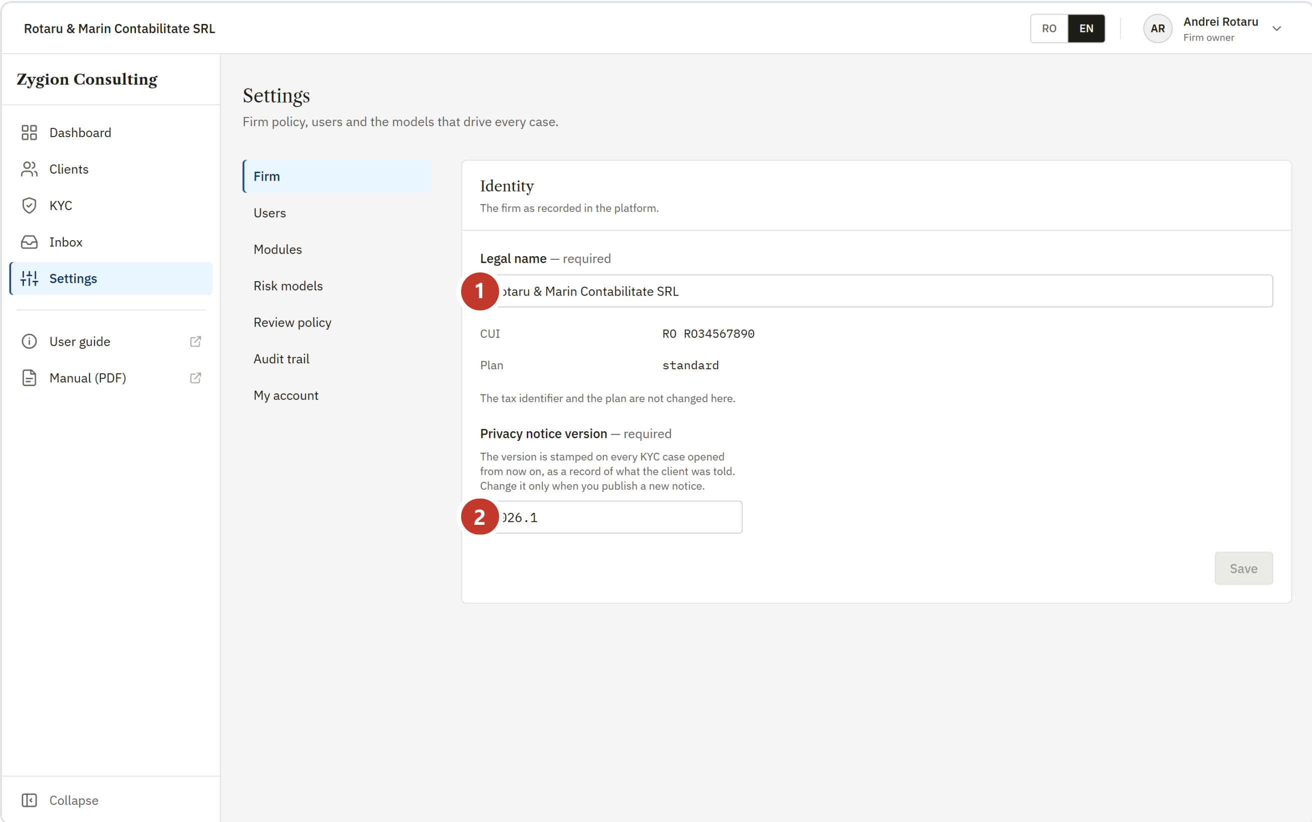
A locked account

Five wrong passwords lock an account. It unlocks itself after a while, and the firm owner can unlock it here immediately.

The firm

Settings → Firm

Your firm's legal name, tax number and the version of the privacy notice your clients were given. That last one is not decoration: a KYC file cannot be opened until it is filled in, because every file records which notice was in force when the client's data was collected.

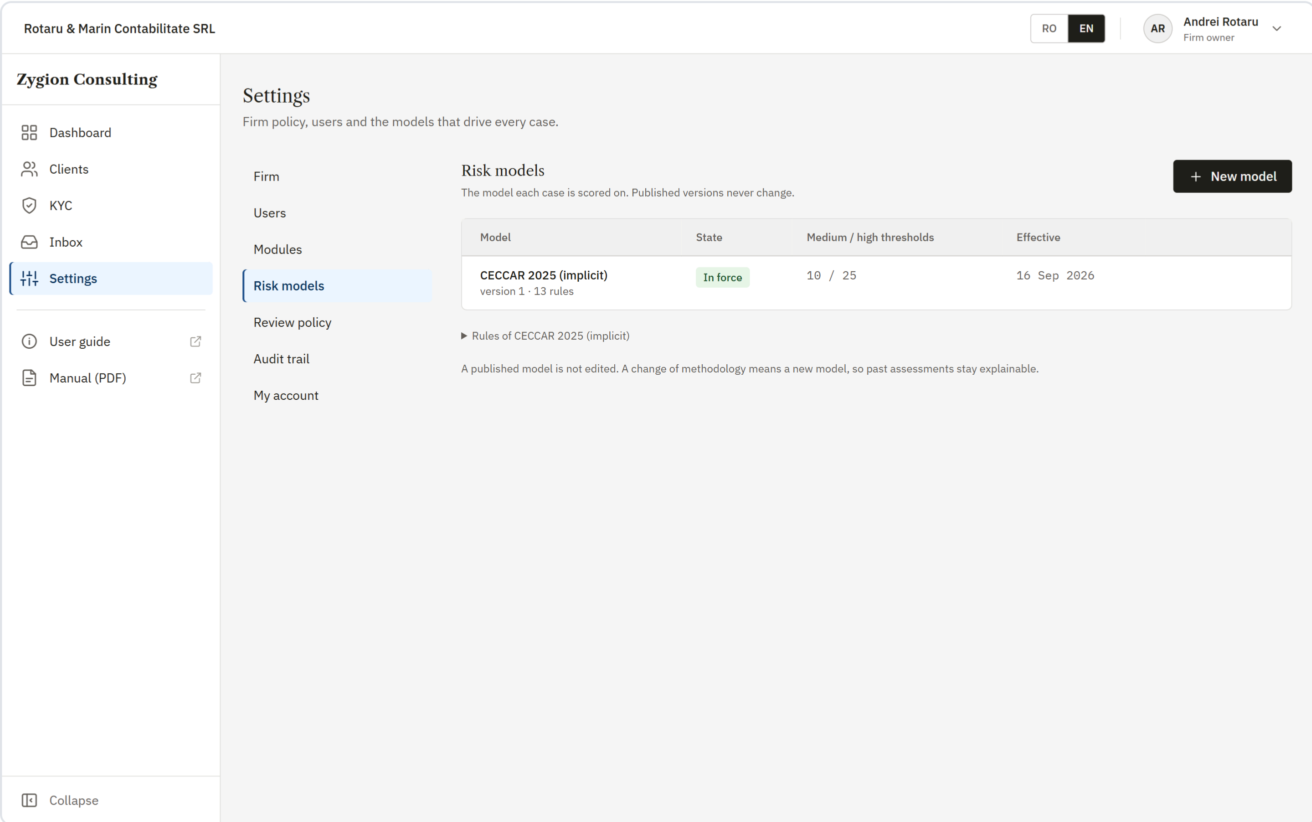


1. The firm's legal name, as it appears on the dossiers you hand out.
2. The version of the privacy notice your clients were given. A KYC file cannot be opened until this is filled in.

The risk model

Settings → Risk models

The rules that turn answers into a score: what each answer is worth, and where the boundaries between low, medium and high fall. The model you are working on is a draft until you publish it, and publishing creates a new version rather than changing the old one.



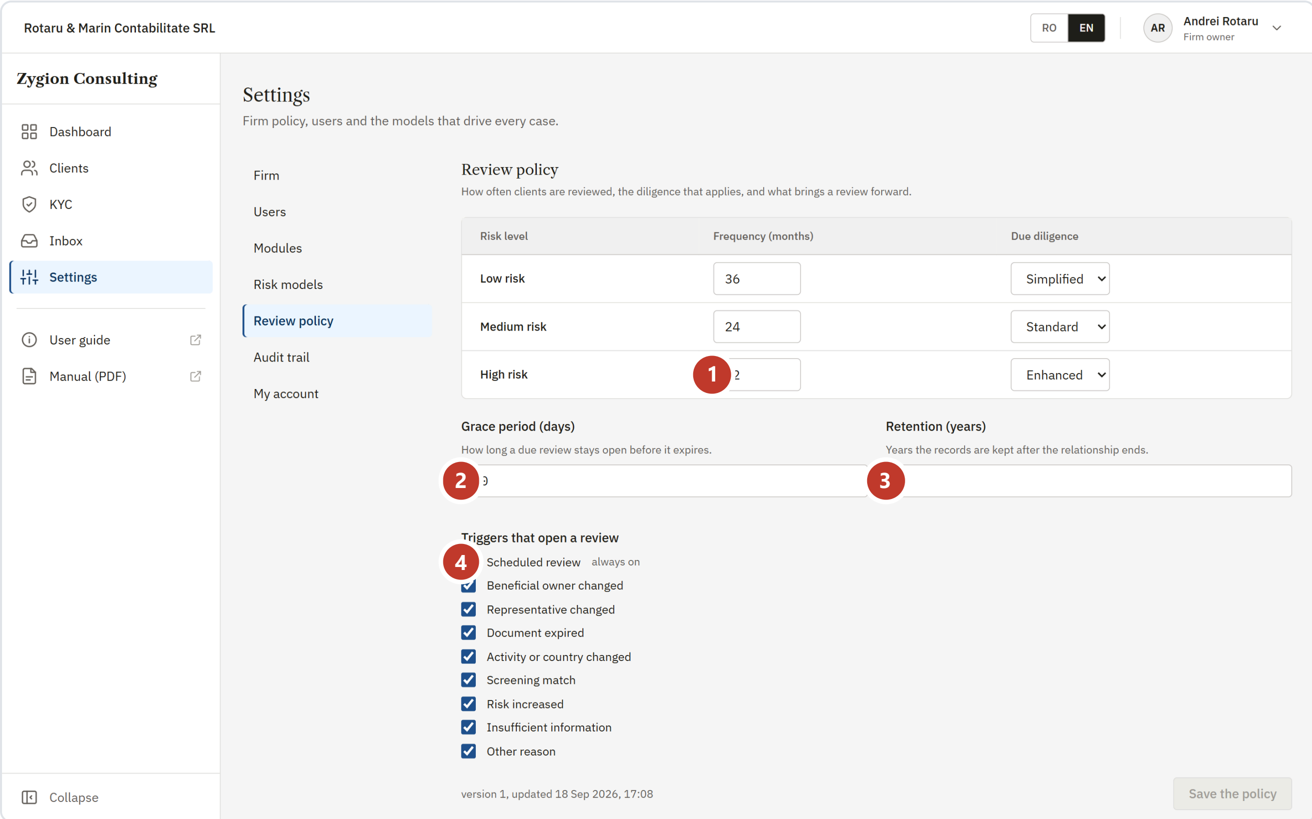
Old assessments do not move

Publishing a new model changes nothing that has already been assessed. Every past assessment keeps the version that produced it, so a decision taken last year can still be explained by the rules that were in force last year.

Review policy

Settings → Review policy

How often a file is looked at again, by risk level, and how long you keep a file after a relationship ends.



1. How many months between reviews, per risk level. High-risk clients come round sooner.
2. How long a review may be overdue before the file is treated as out of date.
3. How long a file is kept after a relationship ends. Five years is the floor; a shorter figure is refused.
4. Events that open a review on their own: an owner changing, a document expiring, a screening match.

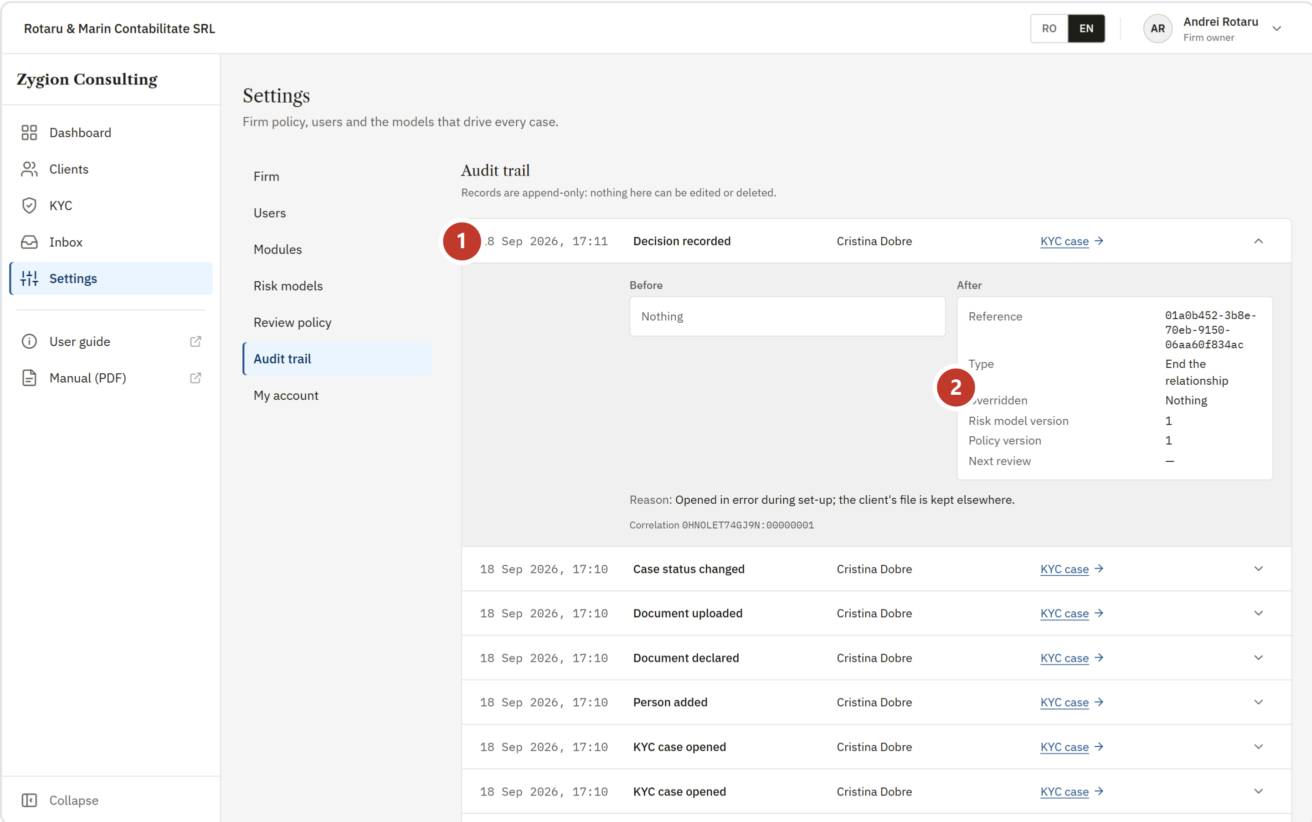
The floor the law sets

Retention cannot be set below five years. The screen refuses a shorter figure rather than accepting it and quietly keeping the data anyway, because five years is what Law 129/2019 requires of you.

The audit trail

Settings → Audit trail

Every action anyone in your firm took, with who did it, when, and what changed. Click a line to open it; you see the state before and the state after, in words, with the reason where one was given. Where a line is about a client or a file, the name is a link that takes you there.



1. Any part of a line opens it — the whole row is the control, not just the arrow.
2. What was recorded, in words. Numbers that stand for a choice are shown as the words used elsewhere in the app.

What it is for

Two things. Answering an inspector who asks who approved a client and on what basis, and answering yourself when something in a file is not what you expected. Nothing is ever edited or deleted out of it, including by us.

When something will not work

The list below covers what people run into most often. In each case the screen is refusing on purpose, and the message says which rule it is.

- **"Information missing" on a file that looked finished.** Something changed after a step was completed — usually a person added after the screening or the ownership assessment. Redo that step.
- **The approve button does nothing.** It is not enabled. The list above it says what is outstanding.
- **A dossier cannot be produced.** Your role does not include the export right. The firm owner or the compliance officer can produce it.
- **A personal number shows as dots.** Your role cannot see it in full. That is not a fault.
- **A download link does not work.** They expire after a few minutes. Ask for it again.
- **The register cannot be reached.** Try later, or add the client by hand with a reason. Do not invent register data.
- **An e-mail has not arrived.** Check spam first, then ask for the invitation to be sent again.

> **One rule with no way round it**
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> A confirmed sanctions match cannot be approved, by anybody, with any reason. Everything else that blocks a file is either something to finish or something someone senior can override with an explanation.