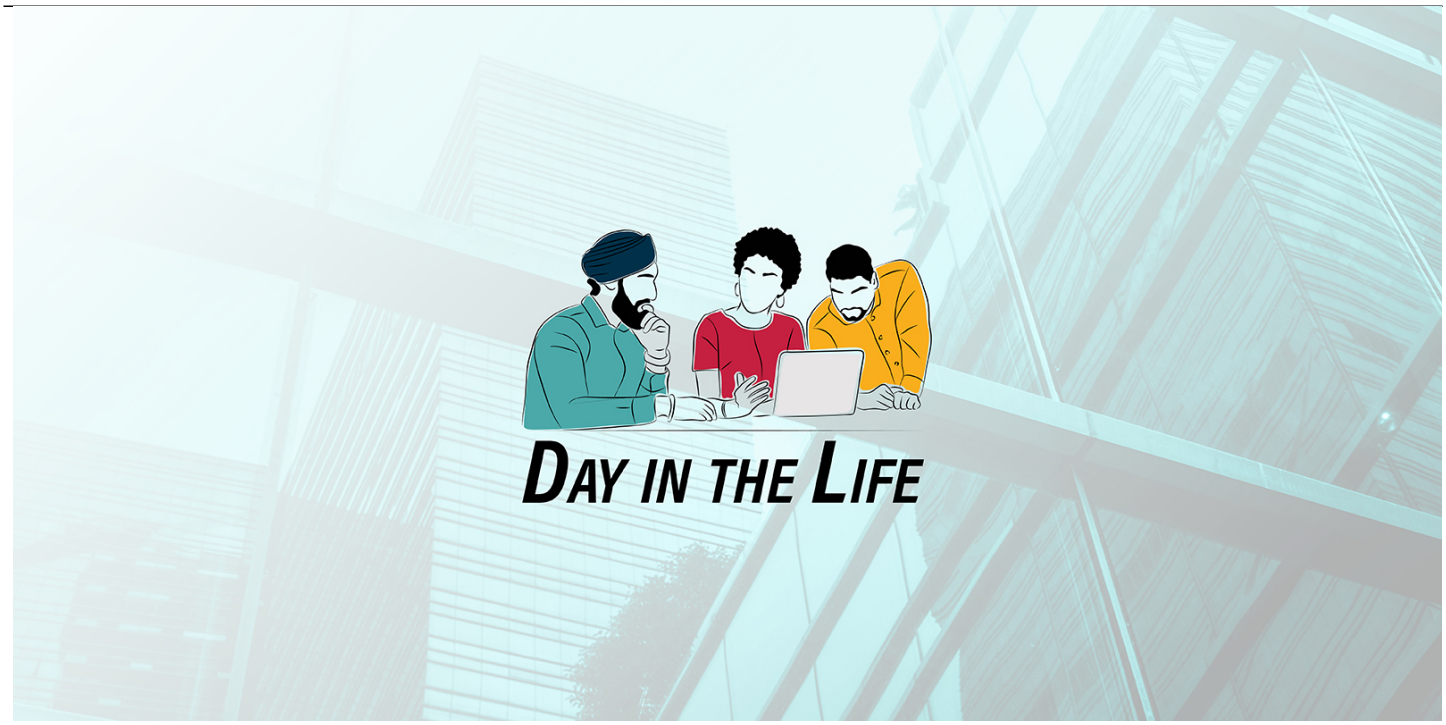



# Day in the Life: Adriana Dulic of Epoch Payment Solutions

**Interviews and Profiles**




Banner artwork by / *ACC*

Name: Adriana Dulic

Title: Chief Compliance Officer

Company: Epoch Payment Solutions

Location: Santa Monica, California (working remotely out of Austin, Texas)



## 5:00 am:

It’s time to hit the ground running and I do mean that literally as I start my day with a run or more precisely with a set of exercises with a resistance band plus crunches, planks, squats, lunges, and pushups followed by a run.

## 7:00 am:

After a quick shower, I scan my e-mail for anything urgent while having breakfast which today consists of a strawberry and banana smoothie with chia and sesame seeds.

## 7:30am:

It is time for stretching. While I’m one of those rare people that always enjoyed stretching and appreciated the importance of it, to miss it these days would be to be toying with a disaster (or rather to be risking an injury) so I diligently stick with it.

## 8:00am:

At my desk and starting my workday by scanning daily alerts (from Lexology, American Banker, and Corporate Counsel) for anything that may be relevant to my company as well as any urgent matters from my European colleagues.

## 9:00am:

With the current administration’s love of all things crypto, it is all about crypto these days and we’ve recently been approached by a couple of Virtual/Crypto Asset Service Providers (VASPs/CASPs) to add stablecoins to the suite of payment types that we offer to the merchants in our portfolio. I am tasked with a review of their compliance documentation and with making a recommendation to our board at our next quarterly board meeting about whether and how to proceed with this new partnership. I start the review by researching the licensing issues in both US and Europe and what impact it may have on us and then review the provided compliance policies and other documentation (such as flow of funds diagrams). I make a note to discuss this issue with our European Money Laundering Reporting Officer (MLRO) in the upcoming days and to reach out to our outside counsel to confirm my findings before making any recommendations.

## 11:00 am:

From time to time, I get calls from various law enforcement agencies looking for assistance in their investigations. Today I get a call from an FBI Special Agent looking to obtain some information from our records about certain payments that we processed that are relevant for an investigation that FBI is conducting. I go over the available options for the release of that data (summons, search warrants,

subpoenas, or court orders) as well as the information that is generally available in our records and what may be the easiest way to locate the relevant information in our records so as to ensure the release of the information that the agent is looking for. As with any job, there are parts of my job that I like better than others. Assisting in the protection of our society and the integrity of our financial system is the part of my job that I love the best.

## Noon:




Quick bite for lunch followed by preparation of the quarterly report for one of our banking partners. With end of a quarter, it is also nearly time for our next quarterly board meeting and at each board meeting I report to the board about what happened in the last quarter, why it matters and what

are we doing about it (or as I like to call it the what, so what, and now what?). I also go over what's coming up ahead and may be around the corner, any regulatory updates and any trends and challenges that we may be encountering and how we are going to deal with them.

## 1:00 pm:

It is time for a Zoom call with the American Red Cross Headquarters about a potential partnership between ACC Austin and the American Red Cross for an International Humanitarian Law (IHL) project. Volunteering, pro bono, and community service have always been one of my top priorities, and so I have always been very active within the ACC community as well as with other nonprofit organizations. I currently serve on the ACC Austin board and as the chair of its pro bono committee and for the past year or so I have also been actively involved with various American Red Cross teams (including IHL). With no shortage of geopolitical risks rising all around us, IHL seems like a perfect fit for ACC Austin members to get involved in and I very much look forward to making that happen.

## 1:30 pm:

Our risk management team gets daily alerts of any potential sanctions matches that may involve any merchants in our portfolio and is tasked with going over those alerts and determining whether it is a true match or a false positive as well as preparing supporting documentation to document it. Once prepared, they submit the documentation to me for my review. I review the documentation and provide my feedback as well as confirm that it should be white-listed as a false positive.

## 2:30 pm:

I get a call from our Know-Your-Customer (KYC) manager with some concerning findings that she uncovered while conducting due diligence regarding one of the applications submitted to us by one of the merchants seeking to open an account with us. I ask her to submit her findings to me in an e-mail and then review them and make a note to discuss this with our Chief Operating Officer (COO).

## 3:30 pm:

Our annual EU/UK/Swiss-US Data Privacy Framework (DPF) Program registration is due for recertification. We process data of European merchants and consumers on a daily basis and so we have been registered with DPF Program and its predecessors (Safe Harbor and Privacy Shield) for many years which requires that our registration be renewed each year. I review current DPF requirements and our privacy policy and make revisions necessary to comply with any changes and submit our recertification application to the International Trade Administration at the US Department of Commerce.

## 5:30 pm:

With most of my colleagues based on the West Coast, the workday isn't over just yet but I take a break for dinner. While having my dinner, I catch up on daily news. I was raised in an era where we all watched nightly news at the same time on our TVs and so I continue with that tradition to this day. It is an entirely foreign concept to me to hear that the new generations get their news off of

social media.

## 6:30 pm:

I get back to my e-mails and end the day with a request from a colleague to review an agreement from a potential new banking partner for any potential anti-money laundering, know-your-customer (KYC), sanctions, privacy and data protection issues. I review the agreement and send my comments/feedback back to him.

## 8:00 pm:

It is finally time to catch some of my favorite shows which on this particular evening involves One Chicago (Chicago Med, Fire and PD). During commercial breaks, I catch up with my friends and family over text/e-mail and I go over the equipment checklist for my upcoming vacation – a weeklong race in the Namib desert (part of the RacingThePlanet series). I've done several of these races by now so I expect to already have most of the required equipment but there are still bits and pieces as well as race nutrition and food to sort through and figure out.

## 10:00 pm:

After a long day, I am happy to call it a day and head to bed.

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Adriana Dulic



Chief Compliance Officer

Epoch Payment Solutions

Adriana Dulic is chief compliance officer at Epoch Payment Solutions where she is responsible for planning, organizing, and leading the implementation of a wide range of legal policies and regulatory compliance, including anti-money laundering, sanctions, privacy, data security, and consumer protection. She is a Certified Anti-Money Laundering Specialist (CAMS), Certified Global Sanctions Specialist (CGSS), Certified Information Privacy Professional (CIPP/US and CIPP/E), and Certified CryptoAsset Anti-Financial Crime Specialist (CCAS). Dulic is also a member of the board as well as chair of pro bono committee of ACC Austin.