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Teema: Request for interpretation of legal provisions regarding real-time interview

Dear Sirs,

I represent Sum and Substance Ltd. (SumSub), a remote identity verification solution that includes document-based identity check, liveness detection, and face match. This is not an exhaustive list of our capabilities.

The purpose of this email is to request clarification on the anti-money laundering legislation relating to providing the real-time interview as a part of the non-face-to-face identification and verification process in Estonia.

The Estonian "Requirements and procedure for identification of persons and verification of person's identity data with information technology means"

(<https://www.riigiteataja.ee/akt/104122020009?dbNotReadOnly=true>), contains the provision (paragraph 11(3) which allows the natural person or the legal representative of a legal entity, with the service provider's permission, use the assistance of another person to eliminate any technical problems when the interview is carried out.

Could you please clarify whether this provision applies to interpreter presence on the user's side during interview sessions when the user does not speak English/Estonian? Or shall the service provider have the interpreter on his side for such users?

It would be much appreciated if you could provide such information.

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Best regards,

Anastasia Sakharova

Legal Counsel

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