

Saatja: Dawid Sendeki <dawid.sendeki@bitbay.net>
Saadetud: 18.10.2021 12:51
Adressaat: RAB rahapesu <info@fiu.ee>
Teema: Kind Request for a recommendation
Manused: Progressplay additional documentation.cdoci

To whom it may concern,

I would like to receive a recommendation of how to proceed with a Customer.
Recently we have onboarded a Customer (ProgressPlay Limited) which is operating in an online gambling industry.
It is a licensed entity (in UK as well as in Malta), their AML policies appear to be up to date and compliant with EU AMLD V.
What's more their services are restricted by geolocalisation in jurisdictions that require separate licenses to provide services in those locations.
During their first top up it was brought to our attention that since 2013 they are on a Hellenic Gaming Commission blacklist ([link](#) <<< position: Edition 29th sheet, row 268).

We decided to contact the Customer and listen to their explanations, Customer declared that since regulation came into force, they do not cater for Greece and do not accept customers from Greece.

Question:

Would you be so kind and recommend if we can maintain the relationship with the Customer or should it be terminated even though that Customer is no longer providing services in locally-licensed-jurisdictions?

**Dawid
Sendecki**
Money
Laundering
Reporting
Officer

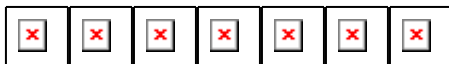
 Lingitud pilti ei saa kuvada. Võimalik, et fail on teisaldatud, ümber nimetatud või kustutatud. Veenduge, et link viitaks õigele failile või asukohale.



dawid.sendecki@bitbay.net



+48 725 027 333



BitBay trademark belongs to BB Trade Estonia OÜ, Harju maakond, Tallinn, Lasnamäe linnaosa, Lõõtsa tn 8a, 11415, Registry code: 14814864, Tax identification number: EE102200164.

This email and any files transmitted with it are confidential and are intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this email. Please notify the sender immediately by email if you have received this email by mistake and delete this email from your system.