Saatja: Olga Mazure <o.mazure@prospectacy.com>
Saadetud: 19.10.2021 12:41
Adressaat: RAB rahapesu <info@fiu.ee>
Teema: FW: Money Laundering and Terrorist Financing Prevention Act
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Dear Sir/Madam

I am Olga Mazure from the company Prospectacy Ltd, we are representing interests of the company P.H Primary OU.
The company P.H. PRIMARY OÜ (reg. 16046808) has received the online gaming license with Estonian Tax and Customs Board (P.H. PRIMARY OÜ, reg. 16046808). We have questions regarding meaning of AML legislation, could you please assist us?

1. We would like to clarify the meaning of Article mentioned Money Laundering and Terrorist Financing Prevention Act
According to the Chapter 3 DUE DILIGENCE MEASURES
Article (3) A gambling operator applies due diligence measures at least upon payment of winnings, making of a bet or on both occasions where the sum given or receivable by the customer is at least 2000 euros or an equal sum in another currency, regardless of whether the pecuniary obligation is performed in a lump sum or by way of several linked payments over a period of up to one month.
Is this article applicable to the online casino also?
According our procedure the customer has to pass identification process before the registration of the account with the gaming operator. During Due Diligence process we identify the customer, receiving the information regarding the residence address, checking the customer in the PEP /Sanction list.
The client can make deposit only with his own credit card and the withdrawal can be made on the same account from which the deposit was done.
Should we made the additionally proof of his identity when the player make deposit or withdrawal in amount 2000 EUR?

2. Regarding requests of source of funds. We are thinking to ask documents proving of source of funds if the customer made a deposit in amount 10 000 EUR or more during one month period, regardless of whether the customer did one transaction or more linked transactions. Could you please advise can we apply this approach?

Best regards,
Olga Mazure | Licensing Specialist

The linked image cannot...

26 Lordou Vyronos Ave.
1096 Nicosia, Cyprus

Tel: +357 22 255 335 | Fax: +357 22 255 330 | Skype : olga.mazure