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Teema: A query regarding the due diligence measures to be applied in gambling sector

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Tähelepanu! Tegemist on välisvõrgust saabunud kirjaga.
Tundmatu saatja korral palume linke ja faile mitte avada.

Hi,

I'm writing to ask a few questions regarding due diligence measures to be applied in gambling sector.

Section 19 of the AML Act states that,

(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.

Following this section, we would like to ask the following:

1. Does this mean that there is no obligation from gambling operators to carry out due diligence if players deposit 1999 Eur after 31 day each time?
2. Are the bets made with no deposit (when playing free bonuses) also to be considered when applying this section 19?
3. Does this section have to be applied only when we talk about withdrawals and bets, OR deposits and bets, OR withdrawals, deposits and bets, OR only bets? Or any kind of payments must be considered when applying the 2000 Eur threshold?
4. Is there a mandatory time period which players must be given to provide due diligence documents when they reach the 2000 Eur threshold?

We will be looking forward to hearing from you! Many thanks for your answers in advance.

Best regards,

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