

Inger Pikkur

From: Georg, Kaur <kgeorg@deloittece.com>
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To: RAB rahapesu
Subject: RahaPTS § 20 uued lõigud

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Tere!

Selline küsimus et RahaPTS § 20 lg 2⁴ alusel teatamine toimub kuidas? Teie ettenähtud vormil on muu hulgas piiratud teate liik järgmiselt:

22. Infoplokis „Teade“ tuleb esmalt valida teate liik („Ebaharilik tehing (UTR)“, „Ebatavaline tegevus (UAR)“, „Rahapesu kahtlane tehing (STR)“, „RSanS-i subjekt (ISR)“, „Summa üle piirsumma sularahas (CTR)“ või „Terrorismi rahastamise kahtlus (TFR)“). Võimalik on sisestada teatele teataja sisemises asjaajamise korras antud number, lisades selle väljale „Teate number“.

Mille alla nimetatud UBO info teavitamine liigituks?

Ning teiseks, selles samas teie teavituse esitamise juhendis ([TEATE ESITAMISE JUHEND.pdf](#)) on kästud teavitus saata 2 päeva jooksul, aga ülalnimetatud seaduselõigus on selleks ette nähtud „mõistliku aja jooksul“. Kas RAB tõlgendabki mõistlikku aega kui 2 päeva, või võib selleks ka üks töönädal olla või kuidas peaks juhinduma ja tõlgendama neid uusi nõudeid?

Eelkõige olukorras, kus § 20 lg 2⁵ alusel audiitor tuvastab erisuse registreeritud ja auditi käigus avastatud UBO nimede vahel, ning hoolimata teavitusest ei paranda klient seda ära. Ootame nädal aega, kui parandamata allkirjastame ikkagi ära ja teavitame nädala jooksul teid? Kuidas näete ette käitumist sellises olukorras?

Best regards,

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