

Saatja: Pavel Ginzul <Pavel.Ginzul@zeply.com>
Saadetud: 06.04.2021 13:42
Adressaat: Rahapesu <rahapesu@fiu.ee>
Koopia: Andrei Bulgakov <Andrei.Bulgakov@zeply.com>
Teema: Zeply - ML/TF Act question - Proof of Address req
Manused: Outlook-kjin4ktl.png

TÄHELEPANU! Tegemist on väljastpoolt asutust saabunud kirjaga. Tundmatu saatja korral palume linke ja faile mitte avada!

Hello there,

Hope you're doing great.

I am contacting you today in regards to the ML/TF Act in an attempt to get additional clarification on paragraph §20 (1) 4 & §20 (2), respectively.

The reason being is that these clauses are not self-explanatory in the sense of how the obligated entity must 'identify' permanent seat and/or place of residence of the natural person.

Provided that the obligated entity follows the ML/TF Act in every other regard could you kindly direct our attention on how the obligated entity should be assessing this information, see the examples below:

- a written text from a client identifying its own address; OR
- a written text from a client identifying its own address that is cross-referenced/ascertained with publicly available information; OR
- a written text from a client identifying its own address that is also evidenced/supported by the third and independent party document (ie utility service provider).

Thank you in advance for providing for looking into this.

Looking forward to hearing from you soon,



PAVEL GINZHUL
www.zeply.com