

Rahapesu

Saatja: inga.vaitkunskaite@afacomp.com
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Adressaat: Rahapesu
Teema: RE: Single Currency Operator License

Tähtsus: Kõrge

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

Dears,

Trust you are well.

I do seek your input and help on this current case. My client is a holder of Currency Operator License in Estonia.

According to AML laws applicable to Estonia, the Law establishes specific duties for the operators of crypto exchanges and custodian wallets. For instance, operators of crypto exchanges are required to report to the FIU about each transaction equal or exceeding EUR 15.000 value (in comparison, financial institutions have the same reporting duty only for cash transactions). Please let us know whether companies' compliance officer must report every transaction which reaches the determined threshold? In the law it is not mentioned the threshold of virtual currency, referring to ART 49 of MLTPA ([Money Laundering and Terrorist Financing Prevention Act – Riigi Teataja](#)).

Further, the reference documents are KYC/AML/CTF manuals and risk appetite statements to keep the company in good legal standing. We do possess them in our company's database, however, to perform due diligence check on some clients are difficult to achieve due to lack of legal guidance, therefore can you share any data which can be relevant for us?

Lastly, is there any legal authority to whom we can address our concerns prior we approach in Estonia.

Thank you and looking forward to hearing from you.

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