REPUBLIC OF ESTONIA
FINANCIAL INTELLIGENCE UNIT

Pavel Ginzhul

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Your ref 06.04.2021

Our ref 27.04.2021 no 1.2-2/15-2

Mr. Ginzhul

We hereby disseminate answer to your question received on the 6th of April. With the question you have asked the FIU to clarify the Money Laundering and Terrorist Financing Prevention Act subsection 4 of the section 1 of the § 20 and section 2 of the paragraph 20. Being more specific you would like to get assurance how the obliged entity must identify the permanent seat and/or place of residence of the natural person.

The identification of the permanent seat and/or place of residence of the natural person must follow the principles that the documents presented by the person are analysed and verified cumulatively. This means that the information must be, to the least extent, cross-referenced/ascertained with publicly available information and if necessary additional documents must be asked (i.e. documents from third and independent party like utility service provider).

Yours sincerely

Marget Lundava

Acting Head of FIU Estonia