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R E Q U E S T

Whereas the definition of "currency exchange service" is not clearly explained within the regulation by Money Laundering and Terrorist Financing Prevention Act, please clarify § 25 of the "Money Laundering and Terrorist Financing Prevention Act" of Estonia and ask the following questions:

1. Does condition 1(2) "The currency exchange service may be provided without identifying the person participating in the transaction of the value of the amount exchanged in cash in a one-off transaction or linked transactions do not exceed 1,000 euros "stipulated under Article "§ 25" applies also to the virtual currency service provider?

2. If yes, does this condition where the "value of the amount exchanged in cash in a one-off transaction or linked transactions" apart from mentioned cash also applicable to fiat and electronic transactions?

3. In our understanding, paragraph 1(2) of Article § 25 is related to the "virtual currency service provider" that provides virtual currency exchange services and allows the "virtual currency service provider" not identifying the person participating in the transaction of the value of the amount exchanged in cash in a one-off transaction or linked transactions does not exceed 1,000 euros if the transaction also has been done electronically/remotely.

Yours Sincerely,

Oksana Bibikova
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