持续监控

Dr Alexander Ressos, TEP
Attorney-at-Law (Switzerland and Germany),
Solicitor (England & Wales and Hong Kong)
Of Counsel, KGP Legal LLC
alexander.ressos@kgplegal.com.sg
www.ressos.com.sg

CDD并不在开户时就告完成。PSN02要求公司持续监控业务关系，并审查交易是否与公司对客户、其业务和风险状况以及（在适当情况下）资金来源的了解相一致。CDD信息必须通过定期审查保持最新，审查频率视风险而定。[1]对于DPT公司，监控系统必须同时覆盖每笔交易的法定货币环节和链上环节。典型的架构是将一个设有速度、金额、拆分交易和地域规则的交易监控引擎，与一个对每笔转入和转出的对手方地址进行评分的区块链分析数据源相结合。MAS期望这些规则根据公司的风险评估进行校准并经过测试。警报必须由受过培训的员工在书面规定的时限内处理完毕，并记录关闭每一项警报的理由。

对客户信息的定期审查应以风险为本：较高风险客户每年审查一次，标准风险客户每两至三年审查一次。在发生重大变化时，例如实益所有权变更、活动量急剧增加或出现负面媒体报道，则在两次定期审查之间进行触发式审查。[2]DPT公司还必须将客户钱包行为的变化视为触发事件。一名企业客户两年来只向自己经核实的冷钱包提款，却突然开始以整数金额向新地址提款，那么无论其文件如何记载，其特征都已经改变。

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注释

1. MAS Notice PSN02，第6段（持续监控）及第8段（对较高风险客户的强化持续监控）。 ↩
2. Guidelines to Notice PSN02，关于持续监控和定期审查的部分。 ↩

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Author contact: Dr Alexander Ressos, TEP · contact@ressos.com