新加坡规则：PSN02关于价值转移的规定

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

PSN02将价值转移要求适用于持牌人代表客户发出或接收的每一笔数字支付代币转移，不论金额大小。所需信息的范围取决于金额。对于1500新元或以上（或以其他货币或DPT计算的等值金额）的转移，汇出机构必须获取并记录汇款人的姓名以及账号或唯一交易参考号。它还必须增加汇款人的另一项识别信息：住址、唯一身份证号码，或出生日期和出生地。它还必须记录收款人的姓名以及账号或唯一参考号。对于低于1500新元的转移，所需信息减少为汇款人和收款人的姓名以及账号或唯一参考号。[1]这些信息必须立即、安全地传输给收款机构。汇出机构还必须核实汇款人的身份，在实践中，它已通过CDD完成了这项工作。

收款机构负有相应的义务。它必须采取合理措施，包括事后或实时监控，以识别缺少所需信息的转移。如果此前尚未核实收款人身份，它必须进行核实。它必须制定风险为本的政策，规定对缺少信息的转移是执行、拒绝还是暂停，以及应采取何种后续行动。[2]如有中介机构，中介机构必须原样转递

© 2026 Dr Alexander Ressos. General information only, not legal, tax or investment advice. No client relationship is created. All Singapore law advice is provided by a duly licensed and regulated firm of Singapore advocates and solicitors only on the basis of an express written letter of engagement. More information at SingaporeIQ.com and ressos.com.sg.

这些信息。在DPT领域，中介机构很少见，因为转移直接从一个托管钱包进入另一个托管钱包。然而，通过第三方托管人处的综合钱包为客户转移进行路由的公司，在实质上就是中介机构，并应以中介机构自居。

“立即、安全”在实践中的含义

通告没有规定具体的技术渠道。MAS在其指引和监管沟通中表示，传输必须与链上转移同步进行，必须在传输过程中保护个人数据，并必须以收款机构可用的形式送达。[3]未经加密的电子邮件不满足安全要求。月底发送的电子表格不满足时效要求。业界已逐步统一采用与转移并行运行的消息协议。旅行规则协议（Travel Rule Protocol，TRP）由瑞士OpenVASP倡议发展而来，IVMS 101数据标准规范信息内容，Notabene、Sumsub和Sygna等商业网络则连接各VASP并在不同协议之间进行转换。[4]新加坡持牌人应已选定一种解决方案，书面说明其为何符合通告要求，并为不在任何网络上的对手方制定备用程序。

注释

1. MAS Notice PSN02，第13段（价值转移），关于汇出机构就1500新元及以上以及低于该金额的价值转移须获取和传输的信息的各分段；1500新元这一数额与适用于银行的MAS Notice 626中的电汇门槛相同。 ↩
2. MAS Notice PSN02，第13段，关于收款机构义务以及对缺少所需信息的价值转移采取风险为本政策的各分段。 ↩
3. Guidelines to Notice PSN02，关于价值转移的部分，涉及汇款人和收款人信息的传输方式和时间。 ↩
4. InterVASP Messaging Standard IVMS 101，由Joint Working Group on interVASP Messaging Standards于2020年5月首次发布；Travel Rule Protocol (TRP)，OpenVASP Association，楚格；关于这些标准的瑞士渊源，参见第F部分第IV章。 ↩

© 2026 Dr Alexander Ressos. General information only, not legal, tax or investment advice. No client relationship is created. All Singapore law advice is provided by a duly licensed and regulated firm of Singapore advocates and solicitors only on the basis of an express written letter of engagement. More information at SingaporeIQ.com and ressos.com.sg.

Disclaimer

This article is provided for general information only. It is based on publicly available sources as at its date of publication. These sources have not been independently verified against licences, regulatory registers or the records of the entities concerned. It is not legal, tax, financial or investment advice. Nor is it a recommendation to invest in, transact with or use the services of any entity mentioned. Law and regulation change frequently, so the content may be incomplete or outdated. To the fullest extent permitted by law, Dr Alexander Ressos and the publisher of SingaporeIQ exclude all liability for loss or damage arising from the use of or reliance on this article. Readers should obtain advice on their specific circumstances before acting or refraining from action.

Names and trademarks of the entities discussed belong to their owners and are used for identification only. Their mention implies no endorsement, affiliation or allegation of wrongdoing. All Singapore law advice is provided by a duly licensed and regulated firm of Singapore advocates and solicitors only on the basis of an express written letter of engagement. Corrections and updates: contact@ressos.com.

© 2026 Dr Alexander Ressos. This article may be quoted with attribution to SingaporeIQ (SingaporeIQ.com). Reproduction in full and any commercial use require prior written consent. The Legal Terms at https://singaporeiq.com/legal-terms apply.

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