地址與假名性

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地址是一串字母和數字，不帶任何姓名。任何人都可以免費產生任意數量的地址。因此，賬本把每宗交易完全公開記錄，卻不識別任何人。這種完全透明與完全假名並存的特點，塑造了兩個樞紐的打擊洗錢法律。瑞士金融市場監管局（FINMA）把非託管地址視為不屬於任何已識別人士，直至金融中介機構以技術上合適的方法核實對該地址的控制權為止。正因如此，瑞士的旅遊規則規定，持牌中介機構在向私人錢包轉賬之前，須先取得控制權證明。[1]新加坡金融管理局（MAS）透過第PSN02號公告中的價值轉移要求應用同一邏輯，詳見第L部分第III章。

假名性亦涉及資料保障層面。地址一旦能與某名自然人連繫起來，便成為個人資料，而區塊鏈分析公司經常能做到這一點。第D部分第X章和第J部分第IX章分別論述根據瑞士《聯邦資料保護法》和新加坡《2012年個人資料保護法》所產生的後果。

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註釋

1. FINMA Guidance 02/2019，2019年8月26日，關於區塊鏈上的支付，第2節（AMLO-FINMA第10條對向外部錢包轉賬及從外部錢包轉入的適用）。在第F部分第IV章論述。 ↩

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