接受加密資產的銀行及保管人

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私人客戶需要三種關係：處理法定貨幣的銀行、保管代幣的保管人，以及往往兩者兼顧的銀行。瑞士在這方面較為領先。Sygnum及AMINA持有銀行牌照，提供主要代幣的保管、交易、質押及以代幣作抵押的倫巴第貸款。蘇黎世州立銀行、PostFinance、琉森州立銀行、Swissquote、Maerki Baumann、寶盛及多家其他老牌銀行，向客戶提供精選代幣的保管及交易服務，部分透過Sygnum或Crypto Finance的企業對企業平台提供。[1]日內瓦及蘇黎世本身不提供保管服務的私人銀行，越來越多接納財富源自數碼資產的客戶，並把保管轉介予合作夥伴。在2026年，持有1,000萬瑞士法郎代幣的瑞士私人客戶，可把代幣存放於瑞士銀行，享有與其證券相同的結單、相同的顧問，以及根據《銀行法》第16條相同的破產保障。[2]

新加坡的銀行較為審慎。星展銀行透過星展數碼交易所（DBS Digital Exchange）向認可投資者及企業客戶提供交易及保管服務。華僑銀行及大華銀行沒有為私人客戶提供直接保管服務，渣打銀行則透過Zodia Custody為機構客戶提供保管服務。[3]因此，新加坡居民私人客戶會把代幣存放於全球交易所的新加坡持牌分支（Coinbase、Crypto.com、Gemini、OKX，均持有主要支付機構（MPI）牌照）、新加坡持牌專門保管人，或瑞士銀行。最後一

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種選擇在較富裕的家族中相當普遍，亦是新加坡家族辦公室與蘇黎世及日內瓦建立關係的原因之一。反方向的流動，即瑞士家族使用新加坡保管人，則較為少見，主要出於亞洲營運需要。

註釋

1. Sygnum Bank AG及AMINA Bank AG（前稱SEBA Bank AG），於2019年8月26日獲FINMA授予銀行牌照；蘇黎世州立銀行，2024年9月4日新聞稿（為零售客戶推出加密貨幣交易及保管服務）；PostFinance，2024年2月21日新聞稿（透過Sygnum進行加密資產交易）。參見第C部分第III章及第A部分第III章。 ↩
2. Banking Act，SR 952.0，第16條第1bis項（為客戶持有的加密資產，如屬個別分配或集體持有而可隨時歸屬，在銀行破產時予以分隔）；FINMA Guidance 06/2024，2024年7月26日（確認針對穩定幣發行人的申索屬存款性質及分隔框架）。參見第D部分第IV章。 ↩
3. 星展銀行有關DBS Digital Exchange的新聞稿（2020年12月推出；2022年9月擴展至認可投資者）；渣打銀行，Zodia Custody在新加坡推出。參見第I部分第IV章。 ↩

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