持續監察

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客戶盡職審查（CDD）並非在開戶時便告完成。PSN02要求公司持續監察業務關係，並審查交易是否與公司對客戶、其業務及風險狀況，以及（在適當情況下）資金來源的了解一致。CDD資料必須透過定期覆核保持最新，覆核頻率視乎風險而定。[1]就數碼支付代幣（DPT）公司而言，監察系統必須同時涵蓋每宗交易的法定貨幣部分及鏈上部分。典型架構結合兩者：一是設有速度、金額、拆細及地域規則的交易監察引擎，二是為每宗流入及流出轉移的交易對手地址評分的區塊鏈分析數據。新加坡金融管理局（MAS）期望規則按公司的風險評估校準並經過測試。警示必須由受過培訓的員工在記錄在案的時限內處理，並記錄結束每項警示的理據。

客戶資料的定期覆核應以風險為本：較高風險客戶每年一次，標準風險客戶每兩至三年一次。如出現重大變化，例如實益擁有權變更、活動急增或負面媒體報道命中，則須在兩次定期覆核之間進行觸發式覆核。[2]DPT公司亦必須把客戶錢包行為的改變視為觸發事件。一名企業客戶兩年來只提款至其本身經核實的冷錢包，突然開始以整數金額提款至全新地址，不論其文件如何記載，其狀況已經改變。

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註釋

1. MAS Notice PSN02，第6段（持續監察）及第8段（對較高風險客戶的加強持續監察）。 ↩
2. Guidelines to Notice PSN02，關於持續監察及定期覆核的章節。 ↩

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