科技風險及網絡衞生

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

數碼支付代幣持牌人的打擊洗錢及恐怖分子資金籌集（AML/CFT）管控措施依靠科技運作，而新加坡金融管理局（MAS）透過兩份通告及一套指引規管這些科技，這些文書在實務上與打擊洗錢計劃密不可分。

MAS有關科技風險管理的第PSN05號通告，對支付服務提供者施加具法律約束力的要求。公司必須設有識別關鍵系統的框架。每個關鍵系統在任何連續十二個月期間內，非計劃停機時間不得超過四小時，並須以四小時為恢復時間目標。發現相關事故後，須在一小時內通知MAS，並在十四日內提交根本原因報告。[1] MAS有關網絡衞生的第PSN06號通告訂明六項基本措施，分別是保護管理員帳戶、及時安裝保安修補程式、制定書面保安標準、實施網絡邊界防禦、部署惡意軟件防護，以及就管理員存取及客戶資訊存取採用多重認證。[2] 2021年1月的《科技風險管理指引》為其餘一切設定標準，該標準雖無約束力，但會被檢查。指引涵蓋管治、軟件開發、第三方管理、事故應對、存取控制、加密金鑰管理及滲透測試。[3]

對數碼支付代幣公司而言，《科技風險管理指引》中有關金鑰管理的部分尤其重要，因為公司的私鑰就是其客戶的資產。MAS期望公司設有有記錄的金鑰生成儀式，並使用硬件保安模組或同等設備；期望職責分隔，令任何單一

© 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.

人士都無法轉移客戶資金；期望大部分資產以冷儲存方式存放，並設有經測試的恢復程序。這些同時也是第K部分第II章下的保管要求，MAS將其作為單一課題檢查。黑客入侵也是一宗打擊洗錢事件。被盜代幣經公司的錢包流出。公司必須能夠追蹤這些代幣，根據PSN03及《貪污、販毒及其他嚴重罪行（沒收利益）法》（CDSA）第45條作出舉報，並與警方及其他交易所合作凍結這些代幣。只涵蓋技術恢復、而不涵蓋監管舉報及鏈上追蹤的事故應對計劃並不完整。第Q部分第II章載有一份黑客入侵後首七十二小時的核對清單。

註釋

1. MAS Notice PSN05, Technology Risk Management，根據Payment Services Act 2019發出，有關識別關鍵系統、最長4小時非計劃停機、1小時內通知事故及14日內提交根本原因報告的各段。 ↩
2. MAS Notice PSN06, Cyber Hygiene，根據Payment Services Act 2019發出，第4至9段，有關六項網絡衞生要求。 ↩
3. MAS, Technology Risk Management Guidelines，2021年1月18日，特別是第10節（加密金鑰管理）及第12節（存取控制）。 ↩

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 Law and regulation change frequently, so the content may be incomplete or outdated.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.

© 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.

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

© 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.