新加坡規則：PSN02關於價值轉移的規定

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PSN02把價值轉移要求適用於持牌人代客戶作出或收取的每一宗數碼支付代幣（DPT）轉移，不論金額。所需資料視乎價值而定。就1,500新加坡元或以上（或以其他貨幣或DPT計算的等值）的轉移而言，匯出機構必須取得並記錄發送人的姓名及帳戶號碼或獨有交易參考編號。它必須另加一項發送人識別資料：住址、獨有身份號碼，或出生日期及地點。它亦必須記錄受益人的姓名及帳戶號碼或獨有參考編號。就1,500新元以下的轉移而言，所需資料減至發送人及受益人的姓名及帳戶號碼或獨有參考編號。[1]資料必須即時並安全地傳送至受益機構。匯出機構亦必須核實發送人的身份，實務上它已透過客戶盡職審查完成這一步。

受益機構負有對應的責任。它必須採取合理措施，包括事後或實時監察，以識別欠缺所需資料的轉移。如之前未曾核實受益人身份，它必須加以核實。它必須設有以風險為本的政策，決定是否執行、拒絕或暫停欠缺資料的轉移，以及應採取何種跟進行動。[2]如有中介機構，中介機構必須原封不動地

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轉交資料。在DPT世界，中介機構甚少，因為轉移直接由一個託管錢包流向另一個託管錢包。然而，透過第三方保管人的綜合錢包轉移客戶款項的公司，實質上屬中介機構，應以中介機構自居。

「即時並安全地」在實務上的含義

通告並無規定技術渠道。新加坡金融管理局（MAS）在其指引及監管溝通中表示，傳送必須與鏈上轉移同時進行，必須在傳送過程中保護個人資料，並必須以受益機構可使用的形式送達。[3]未經加密的電郵不符合安全要求。月底才寄出的試算表不符合時間要求。業界已逐步統一採用與轉移同步運行的訊息協議。Travel Rule Protocol（TRP）由瑞士的OpenVASP計劃發展而成，IVMS 101數據標準規管內容，而Notabene、Sumsub及Sygna等商業網絡則連接各VASP並在不同協議之間轉換。[4]新加坡持牌人應已選定解決方案、記錄其符合通告的原因，並為不在任何網絡上的交易對手設有後備程序。

註釋

1. MAS Notice PSN02，第13段（價值轉移），關於匯出機構就1,500新元及以上與低於該金額的價值轉移須取得及傳送的資料的分段；1,500新元的金額與適用於銀行的MAS Notice 626中的電匯門檻相同。 ↩
2. MAS Notice PSN02，第13段，關於受益機構的責任及就欠缺所需資料的價值轉移採取風險為本政策的分段。 ↩
3. Guidelines to Notice PSN02，關於價值轉移的章節，涉及傳送發送人及受益人資料的方式及時間。 ↩
4. InterVASP Messaging Standard IVMS 101，由Joint Working Group on interVASP Messaging Standards於2020年5月首次發布；Travel Rule Protocol（TRP），OpenVASP Association，楚格；這些標準的瑞士起源參見第F部分第IV章。 ↩

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