

Cryptoassets: the Privacy vs AML conundrum

embedding consent within excess and optional data collected

clear data-processing agreements with processors

Privacy/Data Protection

- user consent
- data security
- purpose limitation
- data minimisation
- storage limitation
- right to erasure

AML/KYC

- Travel Rule (VASPs)
- customer identity verification
- transaction monitoring
- customer record-keeping
- (suspicious) activity reporting

using 'legal obligation' as basis for collecting essential KYC/CDD data