

Marijus Plančiūnas
CEO

Paysera LT, UAB

Pilaitės av. 16
Vilnius 04352
Lithuania

2025-01-06 No. 71/2025

Ministry of the Interior

Pikk 61, 15065

Tallinn, Estonia

info@siseministeerium.ee

Subject: Inquiry and Request for Guidance on Access to the Population Register

Dear Sir/Madam,

Paysera LT, UAB is a licensed e-money institution operating under license No 1/27.09.2012 under Resolution No 03-206, issued by the Bank of Lithuania. We are dedicated to providing secure and innovative financial services while ensuring compliance with all applicable national and EU regulations, including the Republic of Lithuania Law on the Prevention of Money Laundering and Terrorist Financing (PMLTF Law) and the General Data Protection Regulation (GDPR).

As part of our commitment to upholding these high standards, we seek to establish a robust client identity verification process that aligns with legal and regulatory requirements in Estonia and across the European Union.

To ensure compliance with the Republic of Lithuania PMLTF Law and mitigate risks associated with identity fraud, we request guidance on obtaining access to the Population Register administered by the Ministry of the Interior. This database would enable automated retrieval of the following data based on official identification documents (e.g., passport, ID card, or residence permit):

- Full name of the individual.
- High-quality photograph of the individual.

This access is critical for client identity verification, addressing modern fraud risks such as deepfake technologies, and fulfilling our obligations under anti-money laundering (AML) and counter-terrorist financing (CFT) laws.

We kindly seek clarification on the following points to proceed with our request:

1. **Competent Authority.** Please confirm which authority is responsible for granting access to the requested personal document data. If the Ministry of the Interior is not the appropriate institution, kindly direct us to the correct competent authority.
2. **Applicable Procedure.** Please provide a detailed explanation of the applicable procedure for obtaining such access, including the relevant laws, regulations, and administrative rules governing the process. Are there specific forms, agreements, or additional documentation required to initiate this request?
3. **Technical and Procedural Requirements.** What are the technical specifications or integration requirements for implementing and using the access to the database? Are there any procedural conditions or ongoing obligations (e.g., reporting or auditing) that we need to adhere to?
4. **Conditions for Obtaining and Maintaining Access.** Please outline any specific conditions, restrictions, or fees associated with obtaining and maintaining access to the requested data.

As specified above, the access to reliable data sources is essential for compliance with Article 9 of the PMLTF Law, which mandates financial institutions to verify client identity using independent and authoritative information. Additionally, in accordance with Article 6(1)(c) General Data Protection Regulation (GDPR) data processing is lawful when necessary for compliance with a legal obligation to which the controller is subject, as well as when it is necessary for the performance of a task carried out in the public interest.

The rise of advanced technologies, such as deepfakes, poses significant challenges in authenticating client identities. Access to official data will help us to prevent identity fraud and enhance financial security. Automated access to the requested data will streamline our compliance with AML/CFT requirements, reducing risks associated with illicit financial activities, while maintaining the quality of the service provided.

Paysera LT, UAB has successfully implemented similar systems in collaboration with authorities in Lithuania and Georgia, yielding positive outcomes in fraud prevention and compliance efficiency.

We kindly request your response at your earliest convenience, detailing the applicable procedures and the competent authority to which we should direct our formal application. We look forward to your assistance and are committed to cooperating with all relevant authorities to ensure compliance with applicable laws and regulations.

Sincerely,
Marijus Plančiūnas
CEO, Paysera LT, UAB