Proteção de dados na travel rule

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

Transmitir o nome, o endereço e o número de identificação de um cliente a uma instituição estrangeira é uma transferência internacional de dados pessoais. Em Singapura, a obrigação de limitação de transferências prevista no PDPA (Personal Data Protection Act, a lei de proteção de dados pessoais) exige que a organização transmitente assegure que o destinatário esteja vinculado a obrigações juridicamente exigíveis de proteger os dados em um padrão comparável ao do PDPA, salvo se houver uma exceção aplicável.[1] A exceção para transferências exigidas por lei abrange a transmissão em si, quando a PSN02 a exige. Ela não abrange a escolha de um canal inseguro nem a transmissão a uma contraparte que não seja capaz de proteger os dados. As empresas devem assegurar que os termos de sua rede de travel rule imponham obrigações de proteção de dados a todos os participantes e devem documentar essa avaliação. Do lado suíço, a Lei Federal de Proteção de Dados (FADP; DSG) de 2023 impõe exigências comparáveis, tratadas na Parte D, Capítulo X.

© 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.

Notas

1. Personal Data Protection Act 2012, seção 26 (transferência de dados pessoais para fora de Singapura) e Personal Data Protection Regulations 2021, reg. 10 (condições para a transferência). ↩

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 Law and regulation change frequently, so the content may be incomplete or outdated.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

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.