



**PRACTICE OVERVIEW**

# Digital Assets & VASP Compliance

Advisory for crypto-asset service providers, VASPs and the banks that serve them — from registration and MiCA authorisation through AML/CFT, custody controls, data protection and ICT resilience.

## 01 Licensing & registration support

Preparation of VASP registration and MiCA/CASP authorisation files — governance arrangements, internal control framework, ICT and security policies, and responses to regulator questions during review.

## 02 AML/CFT for virtual assets

Travel Rule implementation, blockchain analytics and wallet screening, transaction monitoring calibration for on-chain flows, and source-of-funds evidencing for crypto-derived assets.

## 03 Custody & key management

Hot, warm and cold wallet architecture, HSM and MPC key ceremonies, segregation of client assets, signing policies, and recovery and continuity testing for key material.

## 04 Data protection for on-chain data

GDPR analysis of blockchain and wallet data, DPIAs for analytics and screening tooling, retention and erasure positions on immutable ledgers, and transfer assessments for offshore partners.

## 05 ICT risk, DORA & resilience

DORA readiness for crypto-asset firms — ICT third-party registers for exchanges, custodians and node providers, incident classification and reporting, penetration testing and smart-contract review coordination.

## 06 Bank-side crypto exposure

Advising banks and PSPs onboarding VASP clients or launching digital-asset offerings: risk appetite, counterparty due diligence, and control expectations aligned with CSSF and EBA guidance.

### ENGAGEMENT

Engagements range from a targeted licensing or Travel Rule review to an ongoing Fractional CISO or DPO mandate for a regulated digital-asset entity — delivered on demand or as an ongoing retainer, scaled to entity size.

### WHY THE ADVISORY GROUP

#### 25+ years

in information security, data protection and financial-sector regulation.

#### Luxembourg-based

working daily with CSSF-supervised entities, PSPs and VASPs.

#### Certified

CISM, CRISC, ISO 27001 Lead Implementer, Lead Auditor & Master.