

Before you sign

Client checks for a property sale in
Cyprus: a practical checklist for estate
agents.

1 • WHO IS COVERED

Estate agents are obliged entities under Cyprus's AML law.

Sales and purchases

When you act in the buying or selling of a property.

Law 188(I)/2007, s.2A(ε)

Lettings of €10,000 a month or more

When you act as an intermediary in a letting where the monthly rent reaches or exceeds €10,000.

Law 188(I)/2007, s.2A(ε)

From 10 July 2027

The EU AML Regulation applies in every member state. It covers estate agents and other real estate professionals acting as intermediaries, with the same €10,000 threshold for lettings.

Regulation (EU) 2024/1624, Art. 3(3)(d)

2 • WHO TO CHECK

Both sides of the sale, and the people behind a company.

The buyer, or buyers

Each person signing, and the beneficial owner if they act for someone else.

s.61(1)(α)-(β), s.62(1)

The seller, or sellers

Cyprus's law refers to your client. FATF standards go further: they expect estate agents to apply due diligence to both the purchaser and the vendor.

FATF, Interpretive Note to Rec. 22

The people behind a company

Identify the beneficial owners and understand who owns and controls the company. If it is on a beneficial ownership register, keep proof of registration or an extract.

s.61(1)(β), s.62(1)

3 • WHEN

Before the transaction, not at completion.

Verify the client and the beneficial owner before the relationship starts or the transaction is carried out (s.62(1)).

Low-risk exception

If the risk is low, verification may be completed while the relationship is set up, then finished as soon as possible.

s.62(2)

For an ongoing relationship

A landlord you manage for, a developer, a returning investor: monitoring continues and client information is kept up to date.

s.61(1)(δ)

From 10 July 2027

Estate agents verify after the seller or lessor accepts an offer, and in all cases before any funds or property are transferred.

Regulation (EU) 2024/1624, Art. 23(1)

4 • WHAT TO KEEP

A record you can show five years later.

Customer due diligence documents and transaction records are kept for five years after the transaction or the end of the business relationship.

In practice, a usable record shows:

- ✓ Who you checked, and when
- ✓ Which sources you searched: sanctions lists, politically exposed persons, adverse media
- ✓ What came up
- ✓ What you decided, and why

The five-year rule is in the law. The list above is good practice: a closed browser tab or an undated screenshot is not a usable record.

s.68(1)



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