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COMPLIANCE GUIDE

eCommerce & Marketplaces Compliance in Moldova

COUNTRY Moldova

INDUSTRY eCommerce & Marketplaces

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KEY REGULATORS State Inspectorate for Supervision of Non-Food Products and Consumer Protection · Competition Council · National Center for Personal Data Protection

Key takeaways

- Online shops and marketplaces in Moldova need no special licence: they notify their trading activity to the local authority, and certain goods need extra permits.
- Marketplaces must show buyers who each business seller is (full name, state identification number, address and contacts) and tell buyers whether a seller is a trader or a private individual.
- Tobacco, heated-tobacco and e-cigarette products may not be sold online at all. Alcohol may be sold online only by retailers with a shop of at least 20 m^2, and the courier must see the buyer's photo ID proving they are 18 or over.
- Ordinary online retail is not covered by the anti-money laundering (AML) law, but a seller that accepts cash payments of 200,000 lei or more for goods becomes a reporting entity with full customer checks.
- No law yet requires marketplaces to check sellers' ID documents. A 2025 draft digital services law that would have done so was withdrawn on 8 October 2026 for redrafting, and the Government's digital programme still schedules a new draft for the end of 2026.

The Moldovan market is open to online retail and marketplaces. Information society services need no prior authorisation, and providers established abroad may serve Moldovan consumers subject to national law. The rules that shape a platform come from consumer protection, internal trade, data protection and product-specific laws rather than from a single e-commerce licence.

The principal supervisors are the State Inspectorate for Supervision of Non-Food Products and Consumer Protection (ISSPNPC) for consumer rights online, the Competition Council for platform-to-business fairness, and the National Center for Personal Data Protection for data processing.

The biggest practical obstacle for a new entrant is product scope: the online ban on tobacco and related products, and the physical-shop and ID-at-delivery conditions for alcohol, rule out several categories that are routine in other markets.

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1 Who regulates this sector

Regulator	Remit for online retail and marketplaces	Level	Official site
State Inspectorate for Supervision of Non-Food Products and Consumer Protection (ISSPNPC)	Consumer protection in electronic sales, distance contracts, unfair commercial practices	National	consumator.gov.md
Competition Council	Competent authority for Law No. 53/2025 on online intermediation services (platform-to-business rules)	National	competition.md
National Center for Personal Data Protection	Personal data processing, including biometric and children's data	National	datepersonale.md
Office for Prevention and Fight against Money Laundering (SPCSB)	Financial intelligence unit; AML supervisor of traders in goods paid in cash of 200,000 lei or more	National	spcsb.md
National Bank of Moldova	Licensing of payment and e-money firms where a platform handles buyers' funds	National	bnm.md

State Tax Service	VAT for non-resident electronic services and for platform distance sales of imported goods (intermediary regime)	National	sfs.md
Local public administration authorities	Receive the notification of trading activity	Local	Municipal and district authorities

2 Licensing and authorisation

Under Law No. 284 of 22 July 2004 on information society services (last amended by Law No. 252/2025, in force 14 February 2026), the activity of service providers is not subject to prior authorisation, except where Law No. 160/2011 on authorisation of business activity applies to the underlying activity (art. 5(1)). Other laws may restrict particular goods (art. 8(2)).

Notification of trading activity

Law No. 231 of 23 September 2010 on internal trade (last amended by Law No. 62/2026, in force 10 August 2026) makes any trading activity conditional on a notification filed with the local public authority through the trade information resource; trading starts from the date the authority issues its acknowledgement, with tacit approval if it does not respond (art. 14(1) and (3)). Traders without retail space state a locality instead of a shop address (art. 14(12)). The nomenclature of trade units lists "retail trade through order houses or via the internet" as its own type, a unit trading electronically without retail space; a business with a shop notifies online sales separately only where they are its main activity (Annex 5, position 32).

Product-specific permits and bans

Tobacco and related products

Sale of tobacco products, related products (including e-cigarettes) and their devices and accessories via the internet is prohibited (Law No. 278/2007, art. 31(1)(b)).

Alcohol

Only economic operators that have notified their trade and hold retail premises of at least 20 m² may sell alcohol at retail (Law No. 1100/2000, art. 29(1)).

Handling buyers' money

Collecting payments for sellers is a payment service unless the platform acts as a commercial agent within the exclusion in Law No. 114/2012, art. 2(2)(2); otherwise a licence or registration from the National Bank of Moldova is needed before starting (arts. 10(1) and 14(1)).

Breaches of Law No. 284/2004 carry civil, criminal or contravention liability as applicable (art. 14(1)).

3 AML, KYC and customer due diligence

Online retailers and marketplaces are not, as such, reporting entities under Law No. 308 of 22 December 2017 on preventing and combating money laundering and terrorist financing (last amended by Law No. 146/2026, in force 13 August 2026). Two routes bring them into scope:

- **Cash sales of goods.** Natural and legal persons trading goods for **at least 200,000 lei**, only where payment is made in cash, in one or several linked operations, are reporting entities (art. 4(1)(m)), supervised by the SPCSB (art. 15(1)(h)). High-value cash on delivery is the realistic trigger.
- **Payment services.** A platform that holds or transfers buyers' funds as a licensed payment or e-money firm is a reporting entity supervised by the National Bank of Moldova.

Once in scope, a seller applies standard customer due diligence at the start of a business relationship and for occasional transactions over 20,000 lei made in a single operation through payment service providers, or over 200,000 lei in linked operations (art. 5(1)). Holding 25% plus one share, or more than 25% of the capital, is a criterion of direct beneficial ownership (art. 5^2). Suspicious activity is reported to the SPCSB within 24 hours; cash transactions of at least 200,000 lei in a month by the 5th of the following month; other single transactions of at least 200,000 lei by the 10th (art. 11). Identification data and records are kept for 5 years after the relationship ends or the occasional transaction (art. 9).

Whatever the AML position, knowingly taking part in circumventing international restrictive measures is prohibited (Law No. 25/2016, art. 23), so sanctions screening of sellers and payees is the baseline for every platform.

4 Identity verification and onboarding

Moldovan law sets no general duty to verify the identity of online buyers. Obligations attach to seller identity, buyer age for alcohol and the AML cases above.

Seller identity

Every provider must give buyers and state control bodies easy, direct and permanent access, in Romanian, to its full name and legal form, state identification number (IDNO), legal address, email and telephone, any authorisation, VAT code, prices, delivery terms and ISSPNPC contact details (Law No. 284/2004, art. 12(1)). Online intermediation providers must ensure that the identity of each business user offering goods or services through them is clearly visible, with at least the same core data (Law No. 53/2025, art. 3(5)). For products on online marketplaces, buyers must be told whether the third-party seller is a trader, based on that party's declaration to the marketplace (Law No. 105/2003, art. 13(11)(f)).

Buyer age

For alcohol, sellers and the employees of any business that interacts with the buyer, **including at delivery**, must ask for an identity document or other official document with a photograph proving the buyer is 18; if the buyer refuses, the goods may not be sold or handed over (Law No. 1100/2000, art. 30, letter j). Where consent is the legal basis for an online service offered directly to a child under 14, a parent must consent, and the operator must make reasonable efforts to verify this (Law No. 195/2024, art. 8).

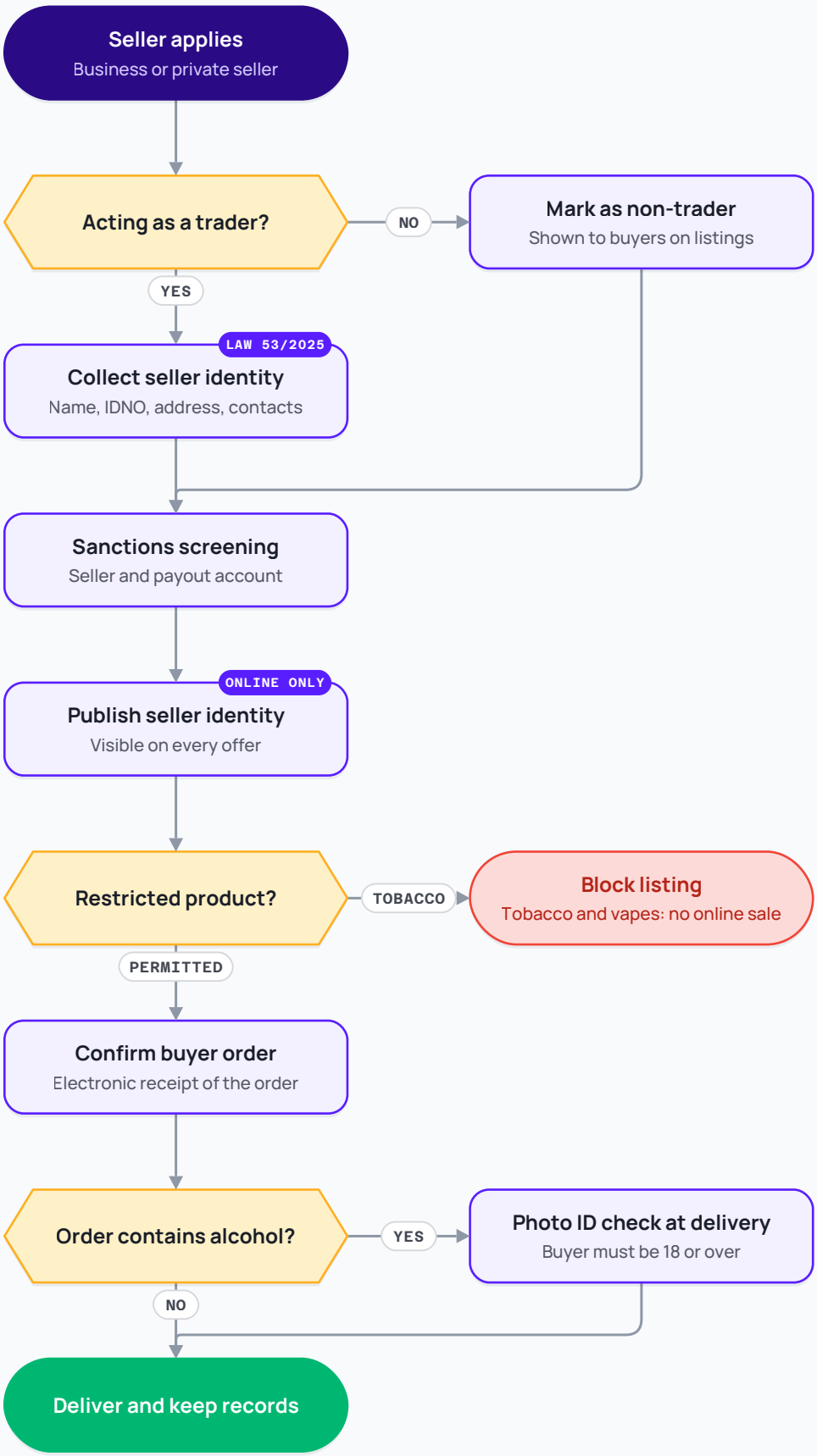


Figure 1. Seller onboarding and age-restricted order flow on a Moldovan online marketplace.

5 Digital channels: what's different

Bottom line: Selling online removes the need for a shop but adds information, order-confirmation and exchange-point duties, and it closes the tobacco category entirely; alcohol moves the age check to the doorstep.

Requirement	In person / shop	Online / remote	Difference
Starting to trade	Notification with shop address	Notification stating a locality; no prior authorisation for the online service	Differs
Tobacco, vapes, devices	Permitted with photo ID check	Prohibited	Differs
Alcohol age check	Photo ID at the till	Photo ID at delivery; seller needs a 20 m² shop	Differs
Seller identity disclosure	General consumer information	Full identity data on the site; marketplace shows each business seller	Differs
Changing one's mind	Exchange of unused non-food goods within 14 days; refund only if no replacement	Right to withdraw within 14 days, for goods from the day the buyer receives them	Differs
Order confirmation	Not applicable	Electronic confirmation without undue delay and error correction before ordering	Differs
Returns and exchanges	At the shop	Dedicated exchange points in the notified locality, published online	Differs
AML cash threshold	Cash of 200,000 lei or more	Same threshold, including cash on delivery	Same
Sanctions compliance	Required	Required	Same

Orders placed electronically

The provider must confirm electronically and without undue delay that it received the order, including whether it accepts or rejects it, and must give the buyer effective means to identify and correct input errors before placing the order (Law No. 284/2004, art. 23(1) and (2)).

Withdrawal and exchange points

Online buyers may withdraw within 14 days, for goods from the day they take physical possession (Civil Code No. 1107/2002, art. 1060(1)); in shops, unused non-food goods may be exchanged within 14 days, with a refund only if no replacement is available (Law No. 105/2003, art. 26). Online sellers without retail space must set up and publish exchange points in their notified locality (Law No. 105/2003, art. 28).

Rankings and reviews

Where buyers can search offers from different sellers, the main ranking parameters are material information to be given in a section reachable from the results page; where reviews are shown, it is material information whether and how the trader ensures they come from buyers who used or purchased the product (Law No. 105/2003, art. 13(12) and (13)).

Pending: no trader traceability rule is in force or currently proposed; the 2025 draft digital services law that contained one was withdrawn on 8 October 2026 `Draft withdrawn, new draft planned`.

6 Data protection and biometrics

Law No. 195 of 25 July 2024 on personal data protection, modelled on the EU General Data Protection Regulation, entered into force on 23 August 2026, 24 months after publication (art. 89(1)), replacing Law No. 133/2011.

Biometric data processed to uniquely identify a person, such as a face match against an ID document photo, are a special category whose processing is prohibited unless an exception applies, including the person's explicit consent for specified purposes (art. 9(1) and (2)(a)). With no statutory identification duty in online retail, selfie or liveness checks cannot rest on a legal obligation, so plan for explicit consent and a non-biometric alternative. Where consent is the legal basis for a service offered directly to children, a parent must consent for a child under 14 (art. 8).

7 Sector-specific obligations

Platform-to-business fairness

Law No. 53 of 20 March 2025 partially transposes Regulation (EU) 2019/1150. It applies to online intermediation services offered to business users established in Moldova that sell to consumers in Moldova, wherever the platform is established (art. 1(2)). It entered into force on 22 April 2026, 12 months after publication, and will cease to apply when Moldova's EU accession treaty enters into force; the Competition Council enforces it (art. 14). It also governs seller suspension, ranking transparency and complaint handling (arts. 4 to 11).

Hosting liability and notices

A platform storing sellers' content is not liable for it unless it knows the activity is unlawful, and must act promptly to remove or block it once it does (Law No. 284/2004, art. 17(1) and (2)). A valid notice must contain the notifier's identity and the facts complained of; the platform forwards it to the seller, and removes the content if the seller agrees or does not reply within 10 working days (art. 17(4) and (5)).

AML training certificates

At traders that are reporting entities (cash payments for goods of 200,000 lei or more), the senior manager responsible for AML, the compliance officer and compliance staff must hold a valid AML training certificate, renewed at least every 3 years; if one is missing, the entity has up to 3 months to remedy it (Law No. 308/2017, art. 13^{1}, inserted by Law No. 146/2026).

VAT on cross-border sales through platforms

Since 1 November 2026, a non-resident without a Moldovan establishment that uses an electronic platform to make or facilitate distance sales of imported goods worth up to EUR 150 per consignment (excluding excise goods) to Moldovan consumers can account for VAT through an intermediary registered in Moldova, which declares the start of activity to the State Tax Service (Tax Code art. 118^{3}, inserted by Law No. 247/2026, art. III point 45, in force under art. XVIII(1)(d)). Where the regime is not used, VAT is due at import, and the person presenting the goods to customs may use a special declaration and payment mechanism (art. 118^{4}). Non-resident sellers of electronic services to Moldovan individuals, and platforms collecting payment for them, are VAT taxable persons (art. 94(d)).

8 Risk indicators and red flags

TRADERS IN GOODS PAID IN CASH (SPCSB INDICATORS)

- **Cash order, non-cash refund**: a valuable item paid in cash, then cancelled with a refund requested by another payment instrument.
- **Refund to a third party**: negotiating returns in exchange for a cheque, especially one made out to someone else.
- **Third-party contact data**: addresses, phone numbers or emails that belong to other persons.
- **Unstable identity**: the customer is hard to contact soon after onboarding, or presents newly issued identity documents.
- **Beyond means**: purchases that appear to exceed the customer's known occupation or income.
- **Mis-valued invoices**: over- or under-valued invoices, or high-value shipments over- or under-insured.
- **High-risk jurisdictions**: transactions with customers from higher-risk jurisdictions.

Source: SPCSB Guide on identifying suspicious money laundering activities or transactions (Order No. 15 of 20 July 2023), section 9. For platforms, the same signals apply to seller onboarding and payouts.

9 Enforcement and penalties

Contravention fines are set in conventional units (CU) of 50 lei each (Contravention Code No. 218/2008, art. 34(1)). Those most relevant online:

- **Distance sales of tobacco and related products**: 72 to 90 CU for natural persons; 240 to 270 CU (12,000 to 13,500 lei) for legal persons, with a 6 to 12 month activity ban (art. $91^1(10)$).
- **Alcohol sold to minors**: 48 to 72 CU for natural persons; 120 to 210 CU for legal persons, with a 3 to 12 month activity ban (art. 91(2)).
- **Unfair commercial practices**: 100 to 200 CU for responsible officers; 200 to 500 CU (10,000 to 25,000 lei) for legal persons (art. 344(3)(d)). ISSPNPC or the courts can also order the practice to stop (Law No. 105/2003, art. 15(1)).

- **No exchange point, or no information about it**: 50 to 100 CU for natural persons; 200 to 400 CU for legal persons (art. 273, point 19).
- **Data protection**: fines up to 1,000,000 lei or, for an undertaking, 1% of the previous year's total turnover, whichever is higher; up to 2,000,000 lei or 2% for breaches of processing principles, consent, special-category rules and data subject rights (Law No. 195/2024, art. 88(1) and (2)). Only 10% of a fine set by the National Center for Personal Data Protection is applied in the law's first year in force and 40% in the second, rising to 100% from the third year (art. 90(4)).
- **AML, where in scope**: fines of twice the benefit derived from the breach where it can be established, or up to the lei equivalent of EUR 1,000,000 (Law No. 308/2017, art. 35(2)(e)); higher ceilings of EUR 5,000,000 or 10% of turnover apply to banks, insurers, investment firms, non-bank lenders, payment and e-money firms and certain other listed entities.

In practice, ISSPNPC carried out 5 planned e-commerce controls between January and September 2026, finding non-conformities in one, which the trader remedied before the control closed (ISSPNPC action plan report, 2 January to 30 September 2026).

10 Recent changes and what to watch

- **1 November 2026**: optional VAT regime for platform distance sales of imported goods up to EUR 150, through a Moldovan intermediary (Law No. 247/2026) `In force`.
- **8 October 2026**: the draft law on digital services (transposing Regulation (EU) 2022/2065; consulted on in April and May 2025) was withdrawn "for reconceptualisation". It would have required seller ID checks before listing `Draft withdrawn, new draft planned`. The Government's digital transformation programme still schedules a new draft for Government approval and submission to Parliament in the fourth quarter of 2026 (Government Decision No. 308/2025, action 3.2.3).
- **14 September 2026**: Law No. 178/2026 on accessibility requirements for products and services published; it covers e-commerce services (art. 2(2)) `Adopted, effective 1 Jan 2028`.
- **23 August 2026**: Law No. 195/2024 on personal data protection in force `In force`.
- **5 to 19 August 2026**: repeated consultation on the draft law to promote the digital economy and e-commerce (629/MDED/2026), adding voluntary complaint systems for online intermediation providers to the consumer protection law `Proposed, consultation closed 19 Aug 2026`.

- **13 August 2026**: Law No. 146/2026 made AML training certificates mandatory for key AML staff of reporting entities, including traders paid 200,000 lei or more in cash `In force`.
- **30 July 2026**: Law No. 278/2007 on tobacco control republished after Law No. 125/2025, keeping the ban on internet sales of tobacco, related products and devices `In force`.
- **22 April 2026**: Law No. 53/2025 on online intermediation services in force `In force`.

11 What this means for identity verification

- **Seller checks are disclosure-driven today.** The law requires that a business seller's identity is captured and shown, not that it is verified; matching IDNO and address against official registers is the obvious control and anticipates the planned transposition of EU trader traceability rules.
- **Age assurance is document-based and physical for alcohol.** Courier workflows need an official photo ID check and a refusal step.
- **Biometrics need consent.** With no legal duty to identify, selfie and liveness checks for sellers or buyers rest on explicit consent under Law No. 195/2024.
- **Cash triggers full due diligence.** High-value cash on delivery can turn a seller into an AML reporting entity with 5-year retention.

IDENTOMAT

How Identomat helps

Identomat runs identity verification, screening and monitoring for regulated businesses on one platform, with workflows you configure for each market. For the requirements in this guide, that means:

- KYB and beneficial owner verification for marketplace sellers, with company data matched to official registers.
- Age verification with ID document capture, so restricted-goods flows can check an official photo document.
- AML screening of sellers and payout accounts against sanctions and PEP lists, at onboarding and on an ongoing basis.
- Biometric liveness and face match with configurable consent steps, deployable in the cloud, on-premises or hybrid.
- No-code workflow builder to add or tighten seller checks as EU-aligned trader traceability rules are introduced.

Request a meeting

DISCLAIMER

This article is intended for informational purposes only and does not constitute legal advice. It is a compilation of information from various sources and reflects the information available as of the last updated date indicated above. Laws, regulations, and regulatory guidance may change, so readers should consult qualified legal professionals for advice specific to their circumstances.

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