Commission de Surveillance du Secteur Financier

# Guidelines for the Yearly Survey on Covered Investment claims (SIIL)

User Guide

# Guidelines for the Yearly Survey on Covered Investment claims (SIIL)

## User Guide

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# 1. Context and reporting principles

## 1.1. Objectives of this document

This document is a guide that explains to the concerned entities how the ICS data must be technically reported to the CSSF.

The information detailed herein relates to:

- Technical overview of the reporting system
- Data and file format of the reports
- Data validation and feedbacks

## 1.2. Context and information to be reported

The objective of this data collection is to obtain information on covered claims in connection with investment business of the members of the SIIL ("Système d'indemnisation des investisseurs Luxembourg") as of 31 December of every year.

## 1.3. Reporting and submission periods

Data collection period is referenced as flow data period or reporting period.

Submission periods correspond to the ICS campaigns which is on a yearly basis (as of 31 December of each year).

# 2. Reporting - technical specifications

## 2.1. Data collection high-level process

The entities entitled to the ICS reporting can submit it through 2 channels: via online filing in eDesk, or by S3 submission.

The process for submitting ICS data is the following:

1. Online form filling (eDesk procedure) or file collection through S3 system

   This process shall be completed during the submission period.

   Note that S3 simply refers to the protocol for managing object storage and not to any service provided by commercial cloud providers.

2. Format and business controls on the online form or/and on the uploaded file
3. Errors messages listed, if any, when submitting the online filling (eDesk procedure) or/and feedback sending (ACCEPTED for positive or REJECTED for negative).

## 2.2. Notifications

There are three type of notifications that will be sent during the campaign.

- A notification will be sent to inform users of the launch of the campaign
- A reminder will be sent 15 days before the end of the campaign
- A last reminder on the last day of the campaign

User with the following roles in eDesk will receive the beforementioned notifications:

- Advanced User
- Conducting officer
- Authorized Director
- Bank Prudential Reporting Responsible

## 2.3. Online survey – eDesk form

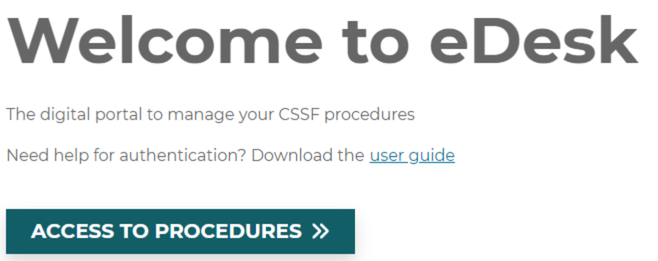
To submit the reporting via the online filling in eDesk, the process is the following:

### 2.3.1. Connect and initiate the questionnaire

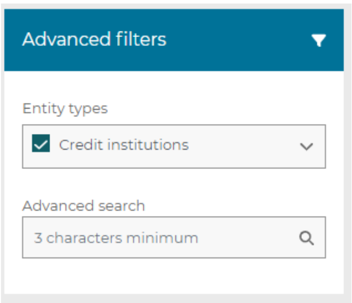
**Step 1**: Connect to [eDesk]

**Step 2**: Access the ICS-DCOR dashboard

a – In the list of procedures,




select the entity type you are in charge of




b – then select the reporting

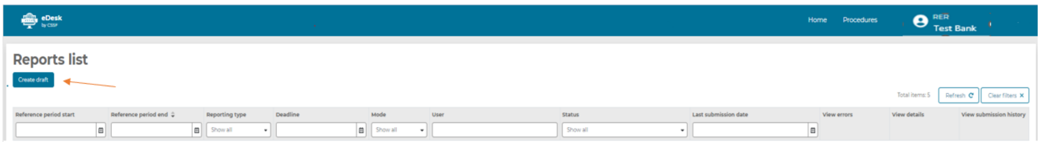
**Credit institutions**

Yearly Survey of Covered Investment Claims (SIIL)

The objective of this data collection is to obtain an overview of the covered claims (instruments and money) in relation to investment business of which members of the Système d'indemnisation des investisseurs Luxembourg (SIIL) are debtors. Concerned entities: Credit institutions*, Investment firms*, Management companies* & Alternative Investment fund managers*.

**Branches of non-EU credit institutions and investment firms, UCITS Management companies and Alternative Investment fund managers whose authorisation includes the management of portfolios on a discretionary, client-by-client basis are in scope of this survey.*

c – Create a draft for your questionnaire

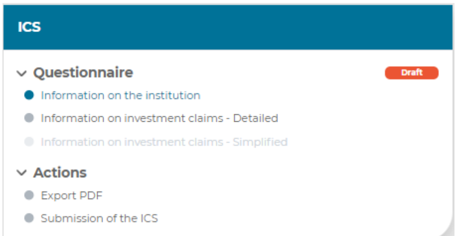



**Step 3:** Choose the correct reporting period

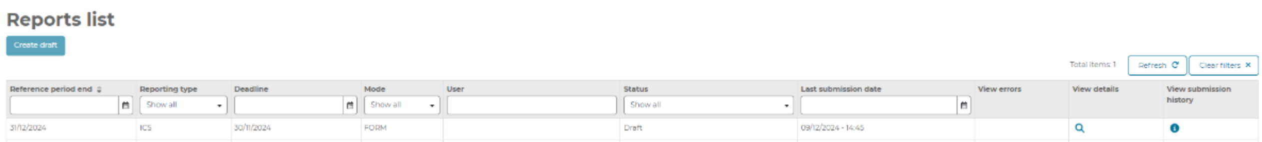
The list of reporting periods consists of the applicable "end of the reporting period" values and will cover in production up to the last 3 years.


Choose the right reporting period in the list.

Once the campaign is chosen, a draft will be created for the questionnaire and will be displayed in the dashboard.




N.B. You can also later (re)access it via the ICS-DCOR dashboard by clicking the magnifier glass in the "View details" column:

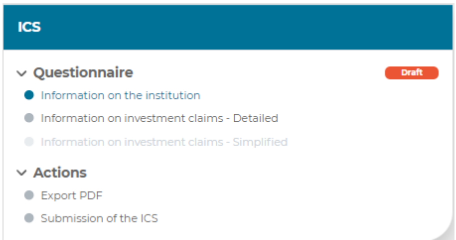



### 2.3.2. Fill-in the online questionnaire

**Step 4:** Fill-in the questionnaire

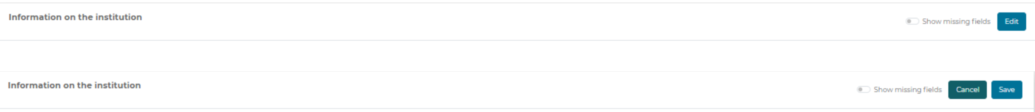
The questionnaire is made up of the following distinct parts:

- the "Questionnaire" with the tabs to be completed,
- the "Actions" that allow you to export at any moment the questionnaire in a pdf format and to submit the completed questionnaire.




The "Information on the institution" tab is pre-filled with the referential information. This information cannot be edited or updated. Only the "Type of Institution" and the contact details of the persons in charge of the report have to be filled in, with at least one value per field.

For each tab, data can be edited and saved at any time before any submission, using the "Edit" and "Save" buttons.

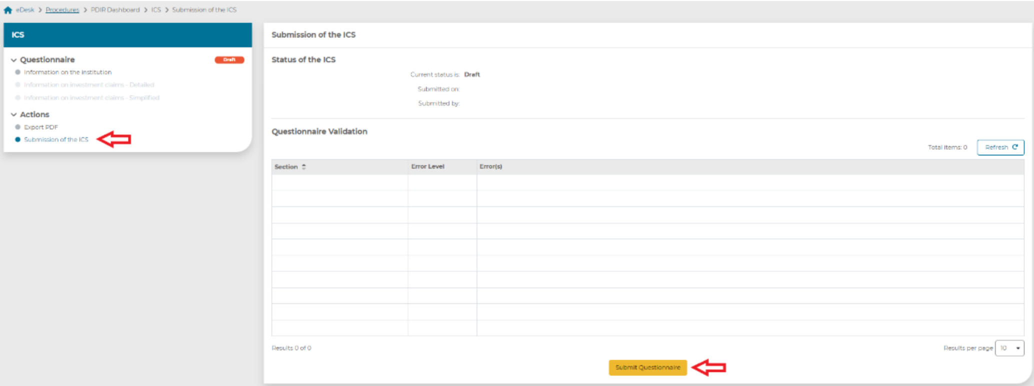



In each tab, the function "Show missing fields" highlights compulsory data that are not yet provided.


### 2.3.3. Submission

**Step 5:** Submit

Once the questionnaire is completed, data can be submitted through the Submission tab.




Once submitted, the data will go through the formal validation rules described into the chapter Consistency checks. The list of ERRORS is then displayed in the same section. It will be available for consultation at any time and will be updated on the next submission.

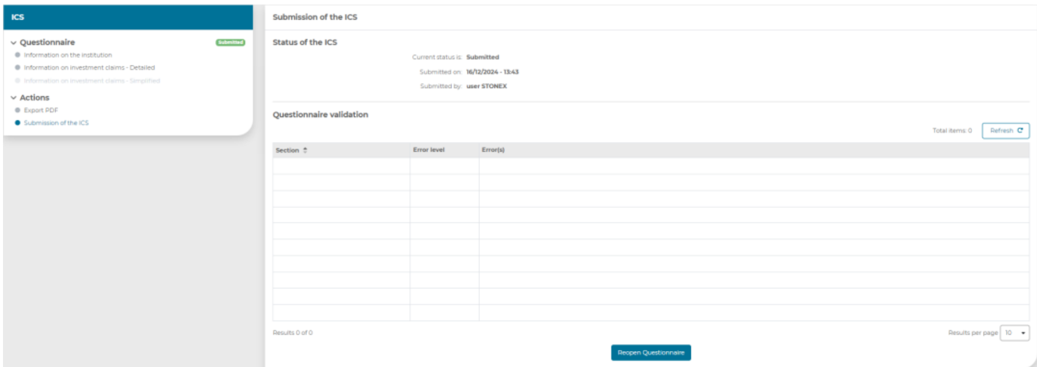
When there is at least one error, the questionnaire is not submitted and will remain in draft status. The submitting entity must review all the ERRORs, correct the data, and submit again.

It is under the responsibility of the submitting entity to check whether the data has been correctly reported.

If data is submitted, but still not accurate, the next step may be to correct the data by reopening and re-submitting the report (please refer the following step).

**Step 6:** Reopen process

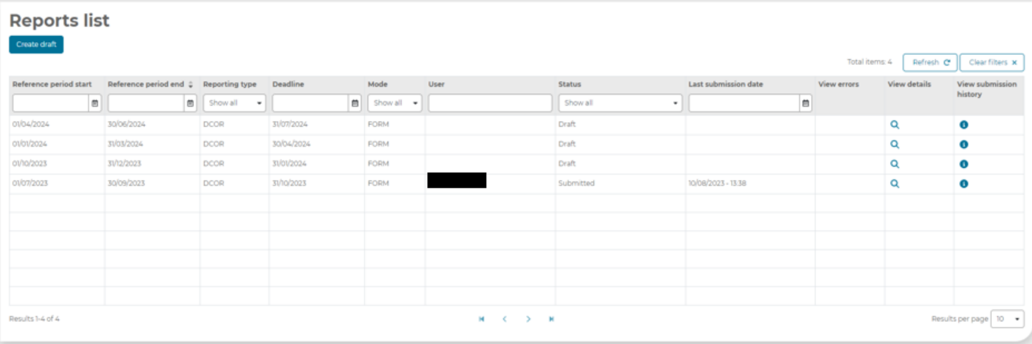
Once submitted, the reporting entity can decide to reopen the questionnaire to correct some data. Go on the "Submission of the ICS" tab of a previously submitted report, a button "Reopen Questionnaire" will appear.




The previous submission will then be canceled, and the re-opened questionnaire has to be submitted again after completing the updates.

## 2.4. Structure of the Dashboard

A dashboard is available for the monitoring of the activity on the ICS-DCOR reportings.


Reports list

Create draft

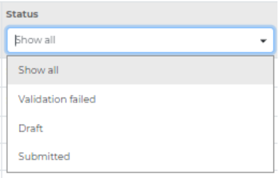
Total items: 4 Refresh Clear filters

| Reference period start | Reference period end | Reporting type | Deadline | Mode | User | Status | Last submission date | View errors | View details | View submission history |
|---|---|---|---|---|---|---|---|---|---|---|
| | | Show all | | Show all | | Show all | | | | |
| 01/04/2024 | 30/06/2024 | DCOR | 31/07/2024 | FORM | | Draft | | | | |
| 01/01/2024 | 31/03/2024 | DCOR | 30/04/2024 | FORM | | Draft | | | | |
| 01/10/2023 | 31/12/2023 | DCOR | 31/01/2024 | FORM | | Draft | | | | |
| 01/07/2023 | 30/09/2023 | DCOR | 31/10/2023 | FORM | [redacted] | Submitted | 10/08/2023 - 13:38 | | | |

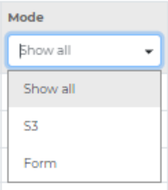
Results 1-4 of 4

Results per page 10

Filters allow visualizing by status (Validation failed, Draft or Submitted are the possible statuses):




Or by transmission mode (the information is available no matter the channel used for the submission, S3 or online form):




S3 File collection

## 2.5. Reporting file

### 2.5.1. Reporting format

Data concerning ICS shall be reported in the JSON (JavaScript Object Notation) format.

You can find the JSON schema concerning the data of the precontractual documents here:

https://edesk.apps.cssf.lu/pdir/edesk-pdir/api/v1/json-schema/ics

https://edesk.apps.cssf.lu/pdir/edesk-pdir/api/v1/json-schema/ics-feedback

#### 2.5.1.1. Submission process

The ICS JSON file MUST be uploaded in the "submission" folder in S3. No upload is allowed in other folders (e.g.: "feedback" folder is only dedicated to your feedback and it is created automatically after the first submission).

The responsibility of the bucket is to grant access to our system. It is not intended for long term storage. Regular cleaning might be performed by CSSF.

#### 2.5.1.2. Naming convention

The mandatory file naming convention for .json files is as follows and requires support of the UUID format (universally unique identifier):

Format : ICS-ENNNNNNNN-YYYY-MM-DD_UUID.ext

| Code | Meaning | Structure | Authorised value |
|---|---|---|---|
| **ICS** | Reporting type | Char(3) | 'ICS' (constant) |
| **-** | Separator | Char(1) | '-' (constant) |
| **E** | Reporting entity | Char(1) | Entities in scope of the reporting can be «B», «P», «S» or «A» |
| **NNNNNNNN** | Identification number | Number(8) | 00000001…99999999 (CSSF code of the entity) |
| **-** | Separator | Char(1) | '-' (constant) |
| **YYYY** | Reference year | Number(4) | nnnn |
| **-** | Separator | Char(1) | '-' (constant) |
| **MM** | Reference month | Number(2) | nn (1…12) |
| **-** | Separator | Char(1) | '-' (constant) |
| **DD** | Reference day | Number(2) | nn (1…31) |
| **_** | Separator | Char(1) | '_' (constant, underscore instead of dash) |
| **UUID** | Unique identifier (ReportUid) | UUID format | Unique identifier following the rfc4122 norm |
| **.ext** | Extension | Char(5) | .json (constant) |

Please note that you cannot upload twice a file with the same UUID as file name.

#### 2.5.1.3. Consistency verification rules

The CSSF will proceed to evaluate the submitted JSON file which entails a series of formal verifications in order to ensure its compliance.

#### 2.5.1.4. CSSF feedback file

It is up to the submitter to monitor transmission correctness.

A feedback file in JSON format is systematically generated for each file transmitted and made available in the "feedback" folder.

An entity must always ensure that it has correctly received a feedback file for the last file sent, before submitting a new file. Feedback generation could take some time. In case of not receiving any feedback within a working day, please contact our dedicated support team (edesk@cssf.lu).

- Example of file rejected for technical reasons :

/s3-bucket-ics-729d3e87-db8c-4c65-9e39-7b1a7db85404/feedback/ICS-B00000003-2024-12-31_7b0163dd-c44d-4c1e-9d53-e469cee59c23_FEEDBACK.json - B3 ICS - Editor - WinSCP

Encoding Color


```
{
  "header" : {
    "schemaType" : "FEEDBACK-ICS",
    "schemaVersion" : "1.0.0",
    "processTimestamp" : "2024-12-11T08:54:41.931894134"
  },
  "payload" : {
    "status" : "REJECTED",
    "processedFileName" : "ICS-B00000003-2024-12-31_7b0163dd-c44d-4c1e-9d53-e469cee59c23.json",
    "feedback" : [ {
      "code" : "ICS008",
      "severity" : "ERROR",
      "description" : "ERR_003: informationInvestmentclaimsdetailed.totalAmounteligibleinstrumentsdetailed must not be null"
    }, {
      "code" : "ICS008",
      "severity" : "ERROR",
      "description" : "ERR_003: informationInvestmentclaims.totalAmounteligiblemoneyandinstruments must not be null"
    }, {
      "code" : "ICS008",
      "severity" : "ERROR",
      "description" : "ERR_003: informationInvestmentclaimsdetailed.totalNumbereligibleclaimsdetailed must not be null"
    }, {
      "code" : "ICS008",
      "severity" : "ERROR",
      "description" : "ERR_003: informationInvestmentclaimsdetailed.hi20000EURAmounteligiblemoneyandinstrumentsdetailed must not be null"
    }, {
```


##### 2.5.1.4.1. Naming convention

Feedbacks from the CSSF are received in the "feedback" folder of the installed S3 transfer client.

| Code | Meaning | Structure | Authorised value |
|---|---|---|---|
| **SourceFileName** | uuid format | Char(N) | Submitted file name (without .json extension) - Refer to the json File naming convention in section 2.2.3.3 |
| **_** | Separator | Char(1) | '_' (constant) |
| **FEEDBACK** | File type | Char(8) | FEEDBACK (constant) |
| **.json** | Extension | Char(5) | .json (constant) |

#### 2.5.1.5. Report upload status

The file submitted might be either accepted by the CSSF or rejected. The status of the submission is clearly stated into the feedback file made available in the "feedback" folder.

##### 2.5.1.5.1. REJECTED

When at least one of the formal verification rules with ERROR severity has not been met, the feedback status is "REJECTED".

Blocking elements are flagged with an ERROR level in the feedback file.

Explicit error messages are provided within the feedback file.

The next step is to correct the concerned file and to upload a new one with a new file name.

##### 2.5.1.5.2. ACCEPTED

The following message is available in the feedback file received after the submission of a valid file: "*ACCEPTED*". The file has been successfully transmitted and submitted to the CSSF.

### 2.5.2. Data submission through S3 and eDesk

An entity may choose to submit through S3 and / or to complete or correct via the eDesk form.

As soon as the S3 technical checks have been met, data submitted through S3 will be displayed in the eDesk form. A questionnaire will be created in the dashboard for the given reporting period.

When the file is accepted, the questionnaire is in "Submitted" status.

When the file is rejected, the questionnaire is in "Validation failed" status.

At any time, the submitting entity may:

- Access and consult the questionnaire via eDesk through the View details.
- Submit the reporting again through S3
- Or reopen, correct and submit the form again through eDesk

Please note that any submission through S3 will overwrite any corrective actions made through the eDesk. The latest submission either through S3 or eDesk form will the one available on the eDesk form and the one submitted (when no blocking ERROR) to the CSSF.

#### 2.5.2.1. About the S3[1] solution

Please refer to the S3 User Guide [Methods of transmitting reports via API – CSSF]

[1] Note that S3 simply refers to the protocol for managing object storage and not to any service provided by commercial cloud providers.

# 3. Consistency checks

The information provided through S3 or the eDesk form are checked against formal validations checks:

- Technical errors related to S3 submission.
- Format checks
  - Format type
  - Mandatory data

The errors are blocking for the submission: the submitting entity must correct and submit again.

Warnings do not block the submission. It is however expected that the entity is able to justify their presence or correct them, as the case may be.

The message provided is explicit enough to specify the expected correction.

Here below the list of the most common errors in S3 submission:

| Validation | Error code | Error message |
|---|---|---|
| Naming convention | ICS001 | The filename is not compliant with the naming convention. |
| File size | ICS002 | The file is too large (max 1 MB) |
| File uniqueness | ICS005 | A file with the same filename has already been received |
| Security check | ICS006 | The file has been rejected for security reason. |
| JSON schema | ICS008 | The file doesn't match the json schema. |
| In scope entity | ICS010 | Your entity is not authorised to send this type of reporting. |
| Open campaign | ICS013 | No campaign is available for this type of reporting |

# 4. Reporting entities obligations

## 4.1. Data quality

Entities are strongly advised to review and validate their JSON file before any submission. Failure to do so may produce transmission failures.

## 4.2. Review the feedback files and correct the rejected reports

Entities must ensure that all feedback files are properly analyzed and that any rejected reports are corrected and resubmitted.

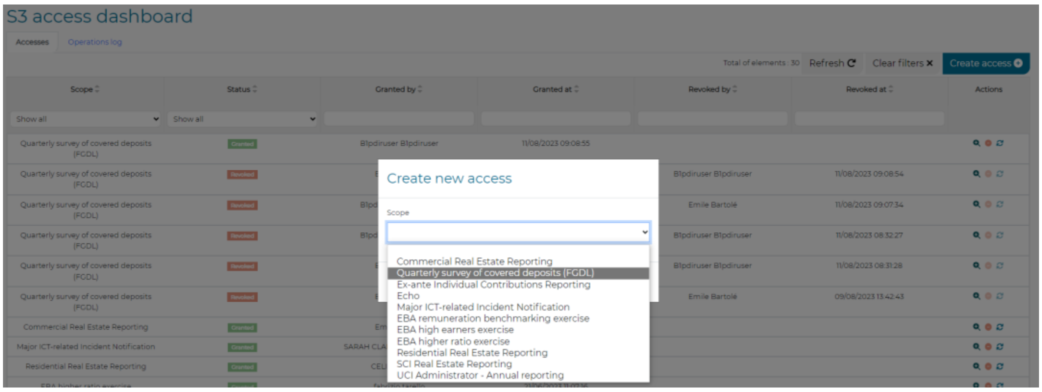
# 5. Testing with CSSF

## 5.1. Connectivity check

A connectivity check is highly recommended before the Go-Live.

Besides the main ICS service, a dedicated "Echo Service" is at your disposal to ensure the good connectivity between your entity and our systems.

The "IT Expert" has to create a new access on the "Echo" bucket that is presented below in order to get the right S3 credentials.




You can upload a dummy file. If the connectivity check is completed, you will get a dummy feedback file proving it.

Please note that this service always remains available.

In case you are unable to connect to the Echo Service or that you are not receiving any feedback, please contact edesk@cssf.lu.

# 6. Contact information

In case of business questions regarding the data collection, please contact cpdi@cssf.lu

For any technical question please contact edesk@cssf.lu.