WEBINAR

CHANGES TO CSSF'S UCITS MARKETING NOTIFICATION FILING METHOD

Impact for e-file users, step-by-step demo of what needs to be done and Q&A

With experts Maxime Aerts, Diana Cutolo and Annael Fleury

December 2023

WELCOME

Diana Cutolo
Key Account Manager

OUR EXPERT TEAM TODAY

Maxime Aerts
Head of Asset Management Product Strategy
FE fundinfo

Diana Cutolo
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AGENDA

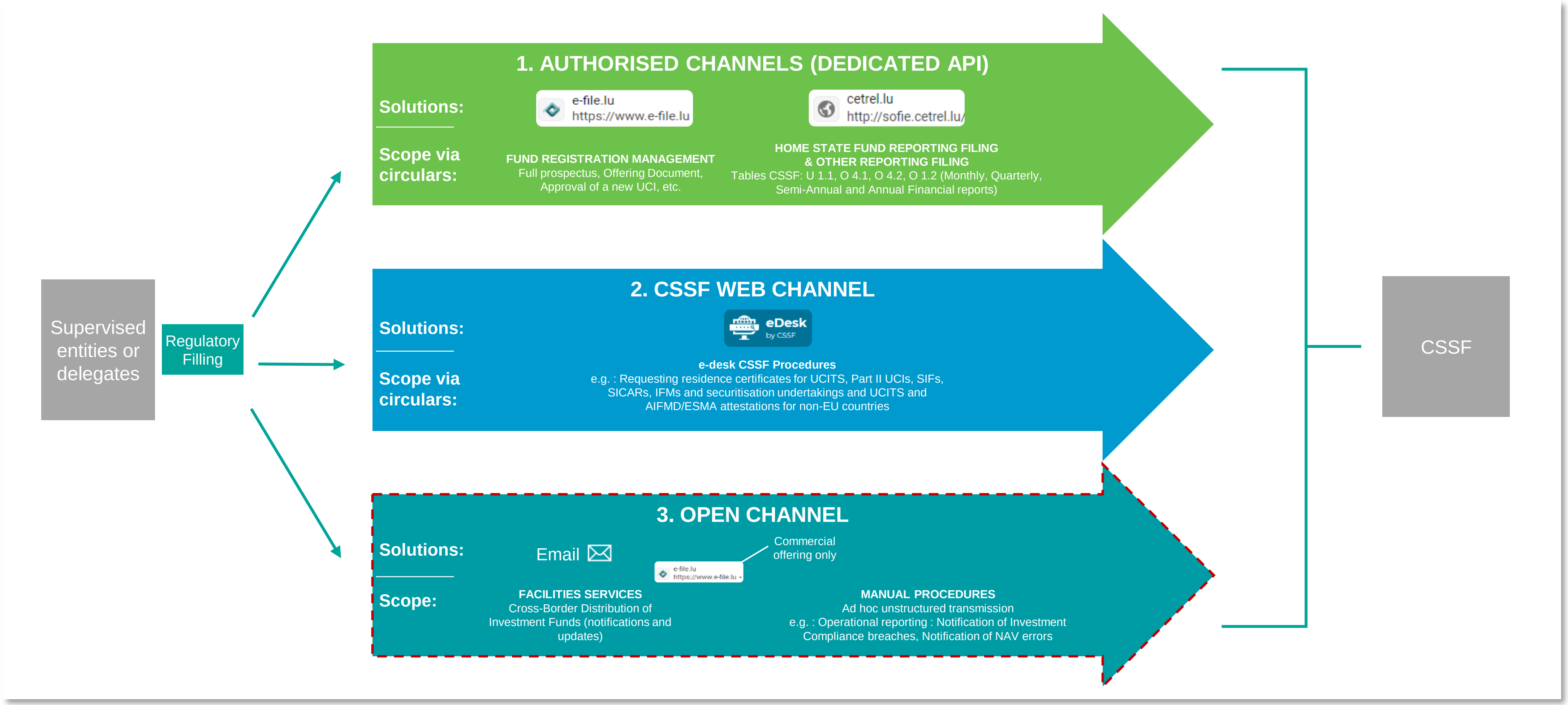
INTRODUCTION

Maxime Aerts
Head of Asset Management
Product Strategy

THE CSSF TRANSMISSION CHANNEL CHANGE AND THE FE FUNDINFO MODEL

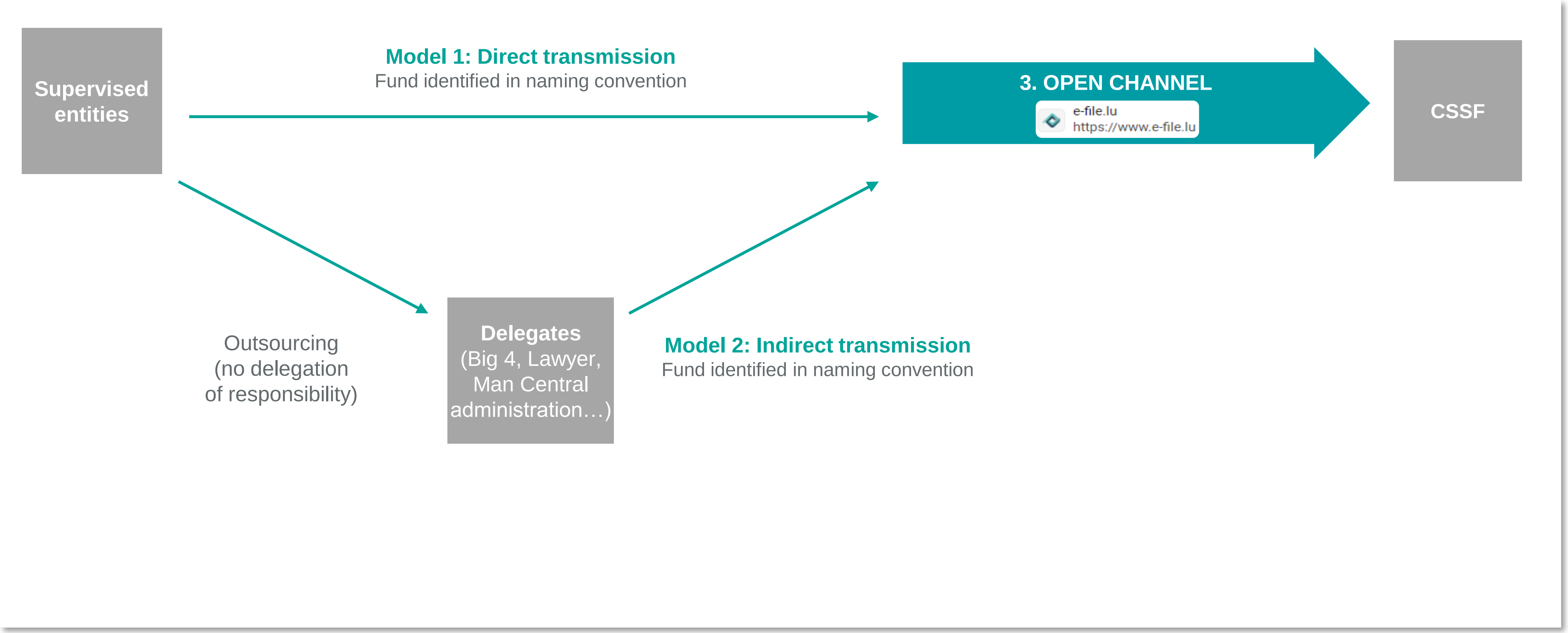
CURRENT COMMUNICATION CHANNELS WITH THE CSSF

Overview of current transmission channels to the CSSF



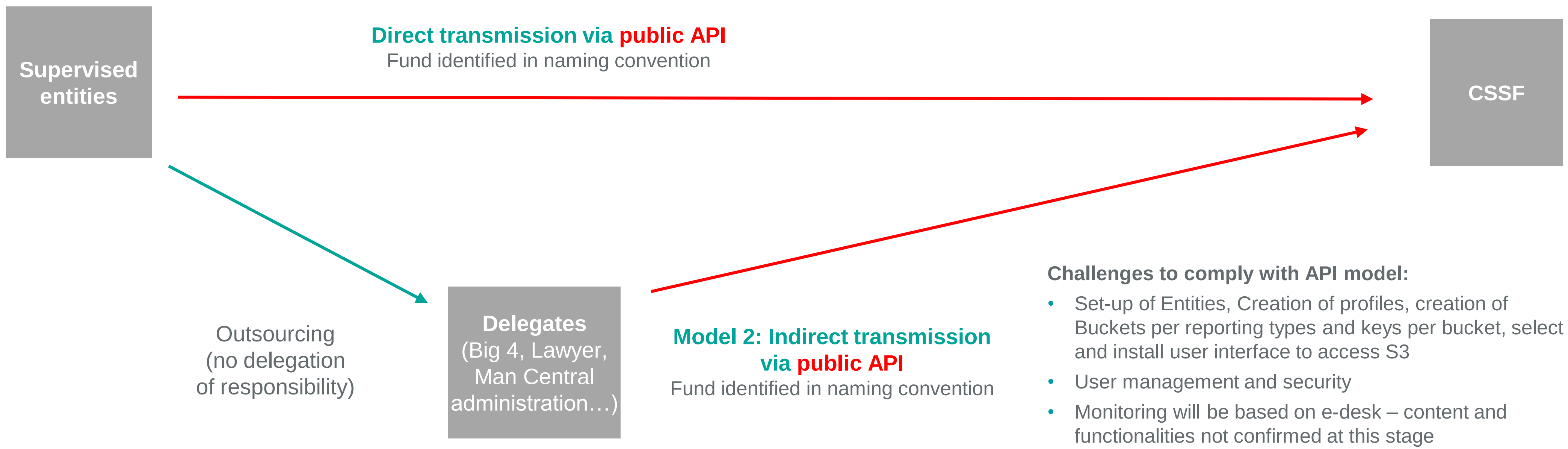
FOCUS ON THE AUTHORISED CHANNEL MODEL

Presentation of the current model



THE S3 CHANNEL MODEL

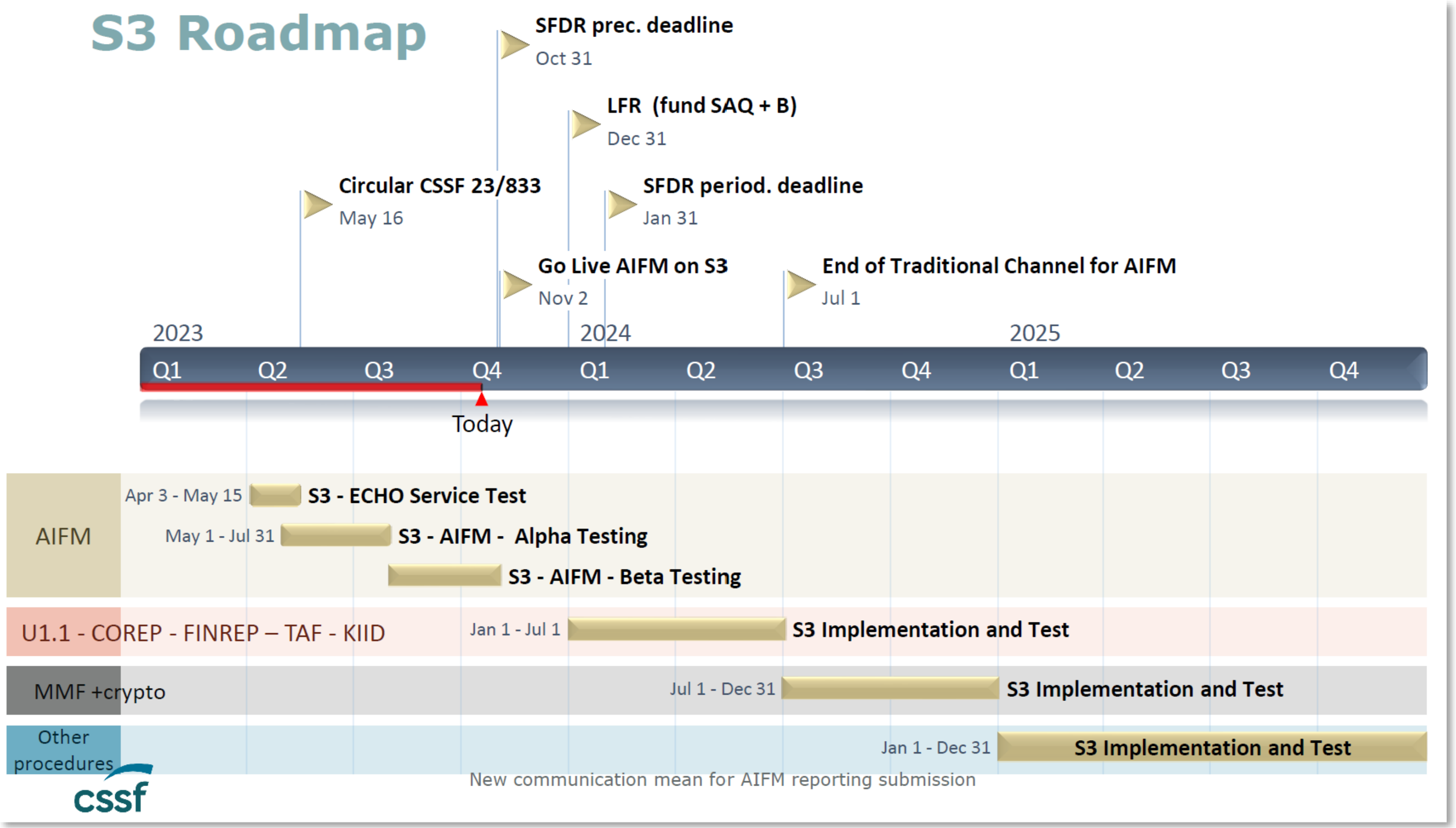
To-Be model and possibility to report directly via public API



Challenges to comply with API model:

- Set-up of Entities, Creation of profiles, creation of Buckets per reporting types and keys per bucket, select and install user interface to access S3
- User management and security
- Monitoring will be based on e-desk – content and functionalities not confirmed at this stage
- Audit trail in S3 is limited and mainly based on selected user interface. e-desk adds another layer of control, but at this stage user actions monitoring is not confirmed
- Change management over time: UCITS Notification and AIFMD reporting are the 1st one of a series – see following slide

THE S3 CHANNEL ROADMAP



FE FUNDINFO PROPOSED MODEL WITH E-FILE

How we ensure continuity for our clients and limit our client efforts

Supervised entities

Model 1: Direct transmission via eFile
Fund identified in naming convention

Same interface and conversion to S3
e-file.lu
https://www.e-file.lu

CSSF

Unique requirement to ensure continuity is to load the S3 bucket keys in e-file.

Outsourcing
(no delegation of responsibility)

Delegates
(Big 4, Lawyer, Man Central administration…)

Model 2: Indirect transmission via eFile
Fund identified in naming convention

Value proposition and how we help address the challenges:

- Effective support for set-up and run by FE fundinfo team
- Security and control on users and workflows via a simple interface in FE fundinfo's e-file.
- Efficient monitoring of regulatory activities facilitated by interactive dashboard
- Historisation of transmissions and full audit trail
- One unique gateway: all CSSF reporting will be covered when needed and multi-NCA

DEMO

Annael Fleury
Product Manager

FE fundinfo

STEP-BY STEP:
HOW TO ONBOARD THE S3 BUCKET KEYS IN E-FILE TO ENSURE CONTINUITY

HOW TO ONBOARD S3 KEYS ON E-FILE

Introduction

> What do I need?

- A LuxTrust Pro Device and password and access to your IT Expert User Account within e-desk.
  You will also need to have access to your e-file Admin account. Please note this is different to the LuxTrust certificate needed for e-file

> Is this going to change anything on my e-file system?

- No, the only change relates to the secure storage of access keys within a new e-file module that is included in your existing package

> What can I do if this does not work:

- Contact your account manager or the Luxembourg helpdesk who can assist with any issues

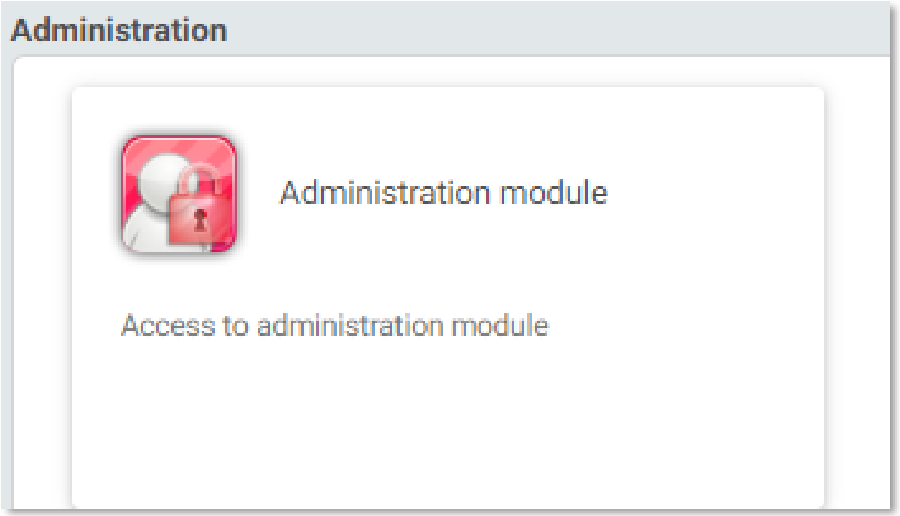
> Do I have to do this now or can I wait until later:

- We strongly recommend doing the proposed steps as soon as possible to make sure you are fully compliant

FE fundinfo experts can provide support when needed, details will be presented in sections 3 and 4

HOW TO ONBOARD S3 KEYS ON E-FILE

Step 1



- Log into e-file (e-file.lu) with the administrator account of the company and open the Administration module in the launchpad
- Remark: it is a prerequisite to have the entity set-up in e-file – a specific webinar on this topic will be organised in the coming days

HOW TO ONBOARD S3 KEYS ON E-FILE

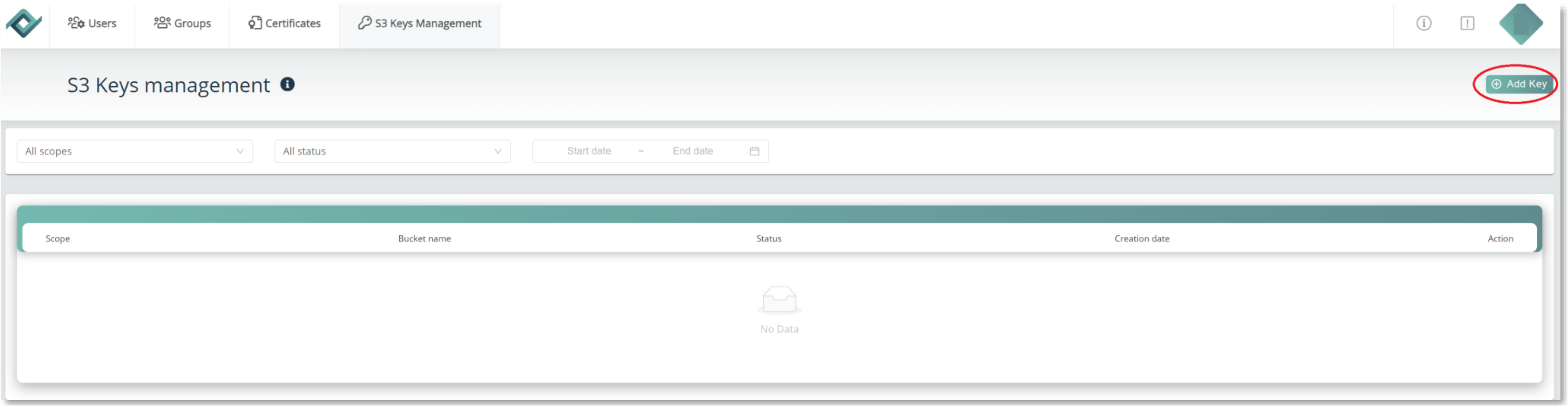
Step 2

When the Administration module is launched, a menu will be available in the header “S3 Keys Management”

HOW TO ONBOARD S3 KEYS ON E-FILE

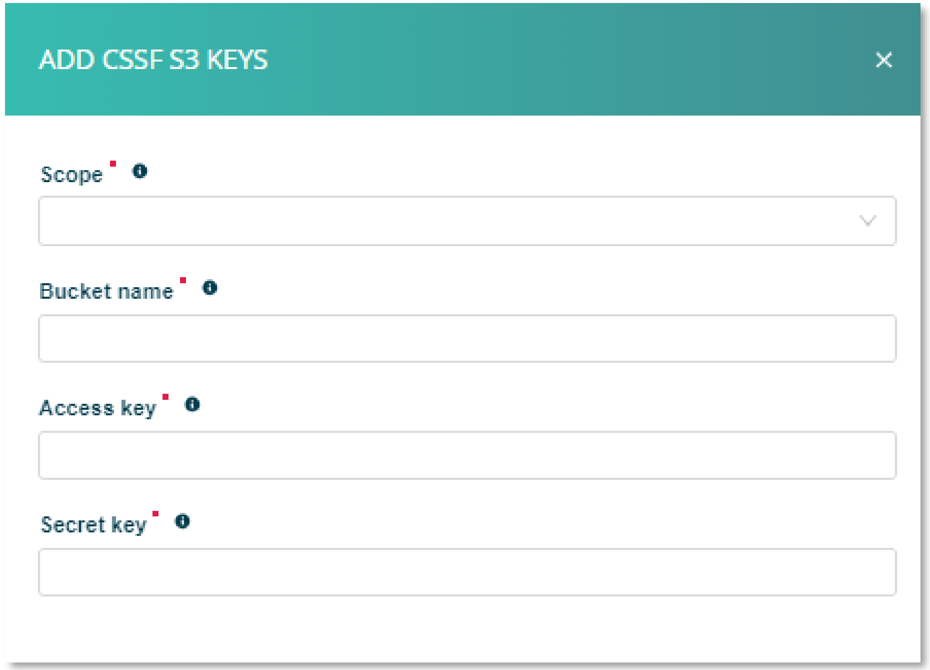
Step 3

When selecting this menu in the header, this page will load:
To add new S3 keys for your company, click on the button “Add Key”



HOW TO ONBOARD S3 KEYS ON E-FILE

Step 4

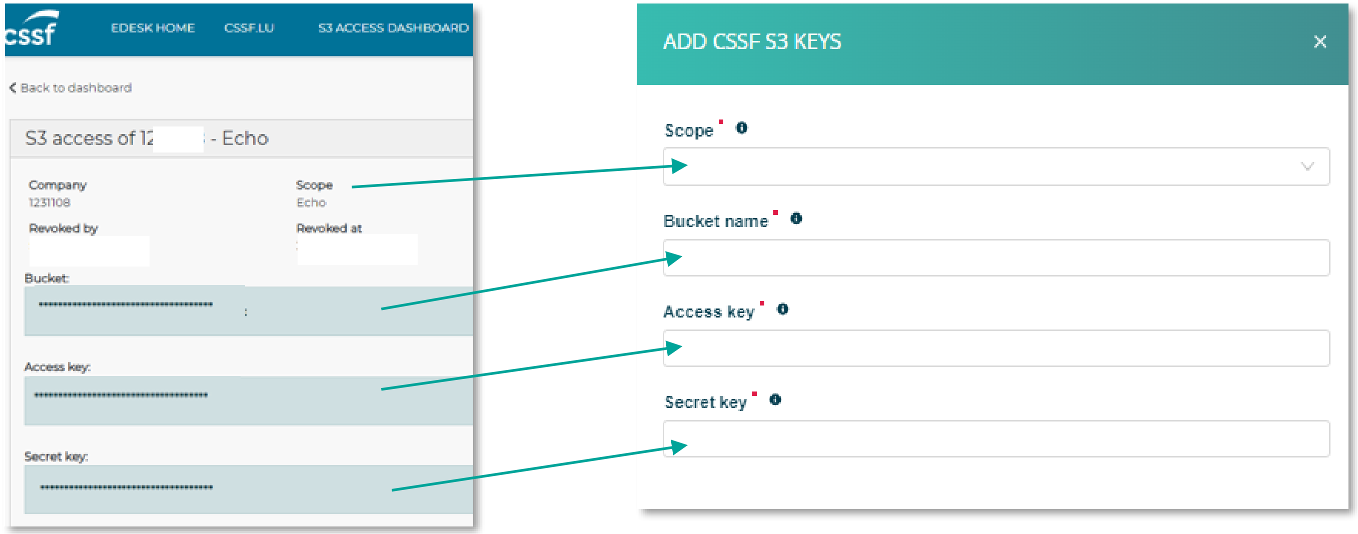


A drawer will appear with a form to fill with different information to provide:

- Scope
- Bucket name
- Access key
- Secret key

HOW TO ONBOARD S3 KEYS ON E-FILE

Step 4 (cont'd)



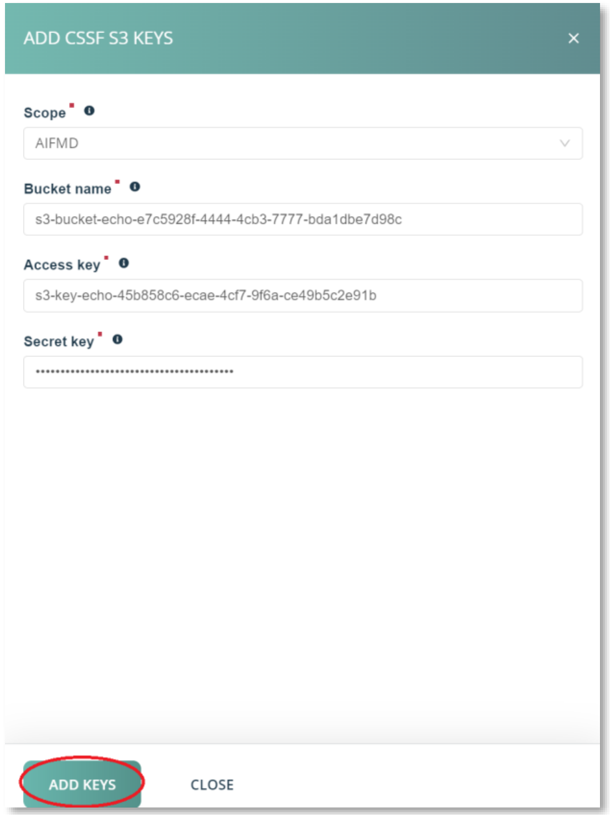
- The S3 Keys information is displayed when creating the keys on the e-desk portal. The mapping is done as displayed here
- When you have entered the mandatory information, confirm the creation of the keys via the button "Add keys" and a new line will appear in the S3 Keys Management page with the information you have provided. Set-up is done

HOW TO ONBOARD S3 KEYS ON E-FILE

Step 5

- The ‘Add Key’ box at the bottom of the pop out will turn blue.
- Click this to add the report keys on e-file’s Key Management module:
- The keys will now be securely stored in e-file and you can continue to use the e-file system as normal.

FE fundinfo will be in touch when the reports have been transferred over to the S3 transmission method, but no further action is required from the e-file user at this point.



STEP-BY STEP:
HOW TO GENERATE THE S3 KEYS ON E-DESK

HOW TO GENERATE THE S3 KEYS ON E-DESK

Step 1

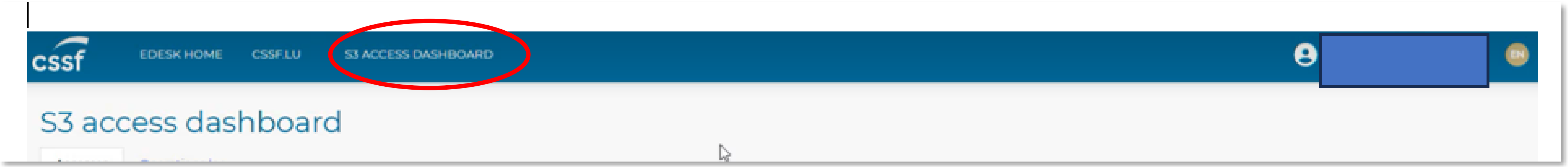
- Your entity's appointed IT Expert will need to log into the IT Management area of e-desk here
- This must be using the same LuxTrust Device and account that the IT Expert role was assigned to. Please note, that these steps can only be implemented from the appointed IT Expert account

FE fundinfo experts can provide support when needed, details will be presented in section 4

HOW TO GENERATE THE S3 KEYS ON E-DESK

Step 2

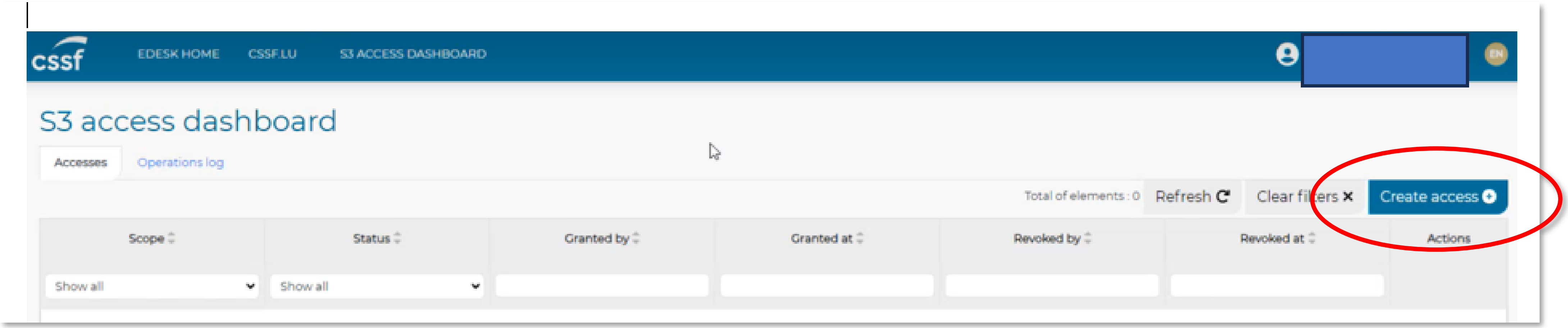
Once logged in, go to the ‘S3 ACCESS DASHBOARD’ at the top of the page, which will take you to a screen similar to the below:



HOW TO GENERATE THE S3 KEYS ON E-DESK

Step 3

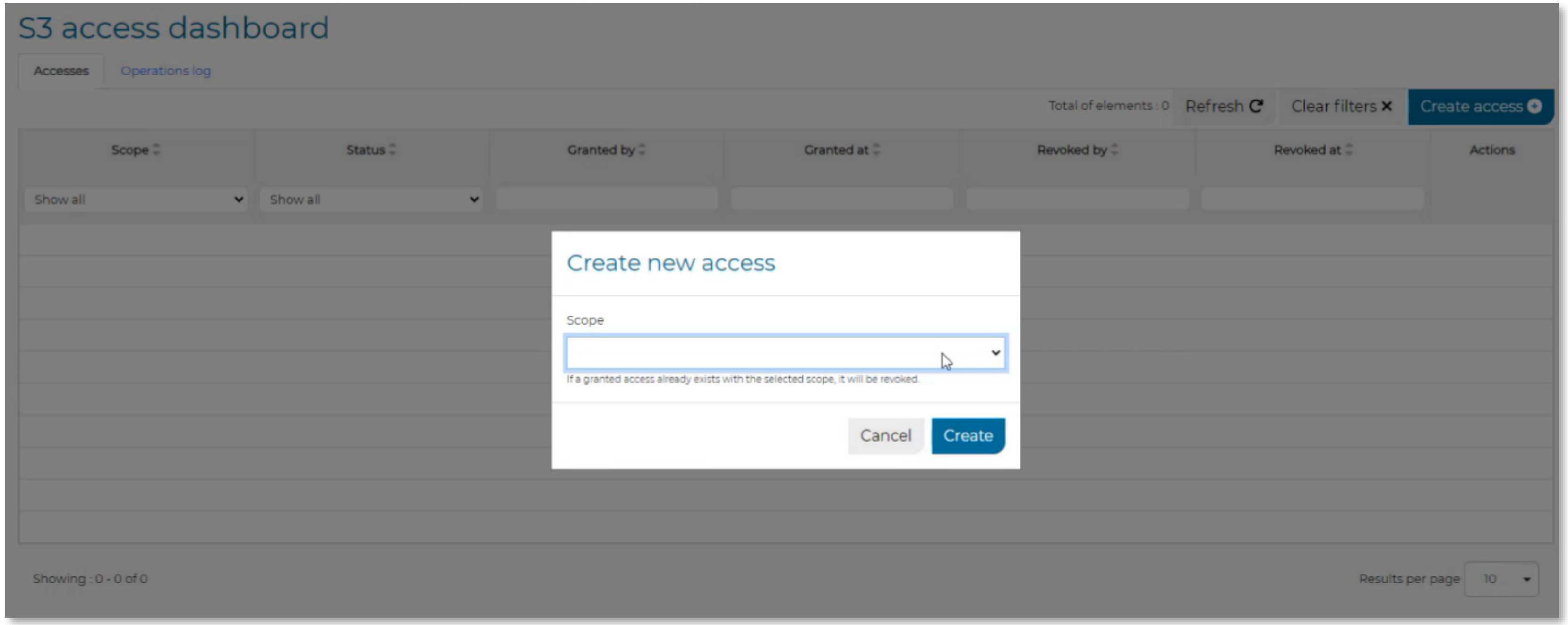
Select ‘Create Access’



HOW TO GENERATE THE S3 KEYS ON E-DESK

Step 4

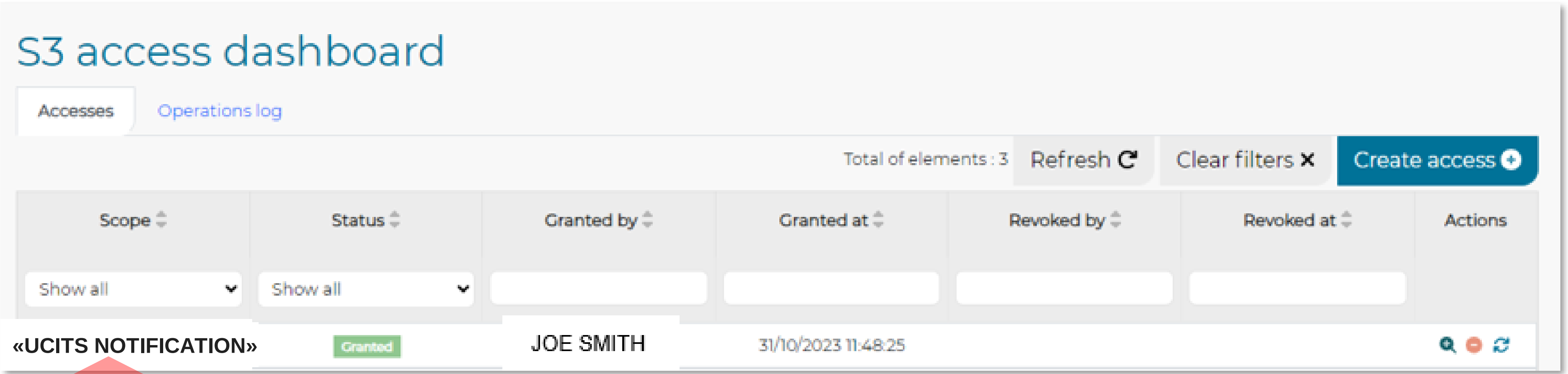
This will provide you with an option to select a 'scope' which will be the reporting type you have been appointed as IT Expert for and select create:



HOW TO GENERATE THE S3 KEYS ON E-DESK

Step 5

This will create a line in the S3 access dashboard with the report type, the status (this should show 'Granted') and the date of this creation:

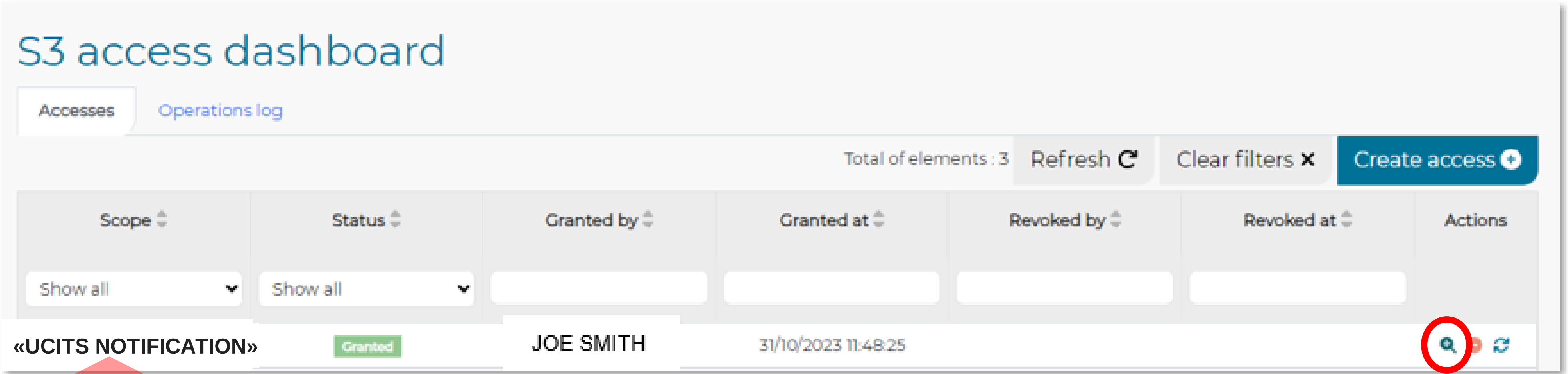


Name TBC by CSSF – not yet available in eDesk

HOW TO GENERATE THE S3 KEYS ON E-DESK

Step 6

Each report type generates 3 codes on e-desk, (the Bucket code, the Access Key, and the Secret Key). To reveal these keys, click the magnifying glass with a '+' icon under the actions column (located on the far right of the screen):

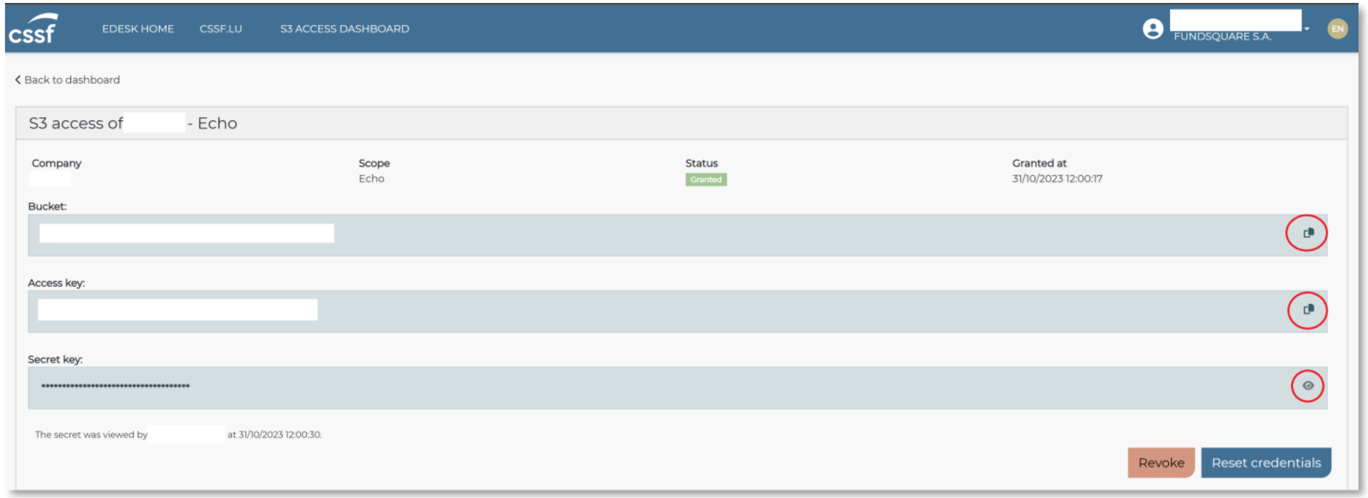


Name TBC by CSSF – not yet available in eDesk

HOW TO GENERATE THE S3 KEYS ON E-DESK

Step 7

- This will reveal the information about the who the access has been granted too, when and what report it is for. It will also provide details of the unique codes specific to the entity, report type and individual.
- You can copy/paste each information with the button on the right of each field.
- The secret key can only be seen once and for few minutes, make sure to copy it.

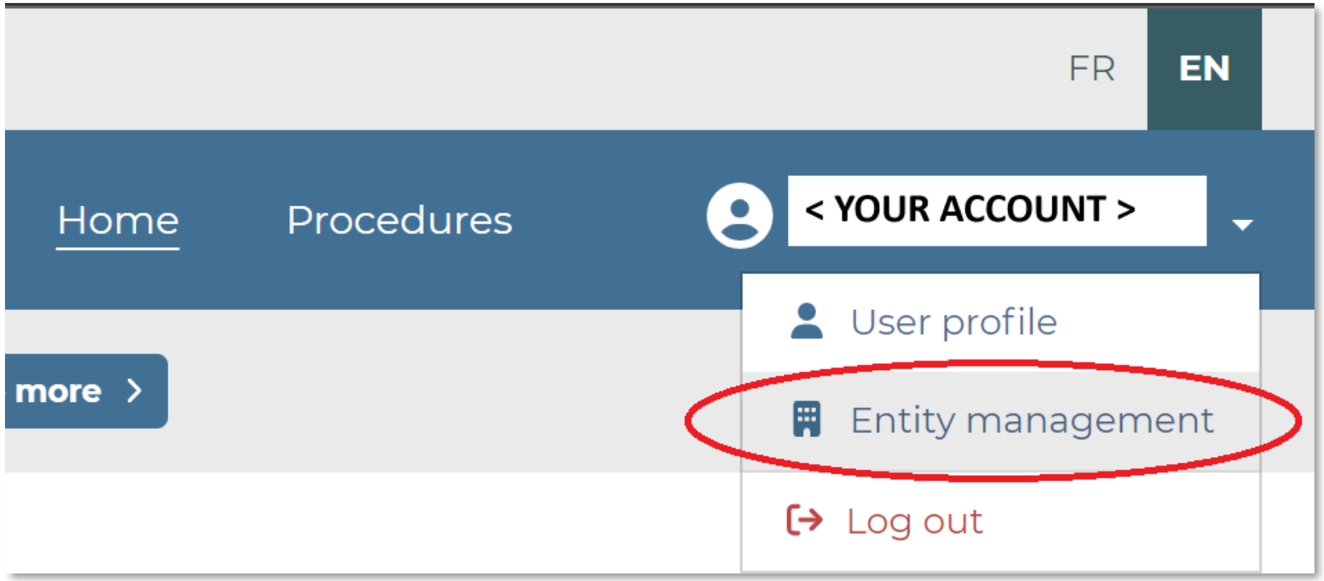


STEP-BY STEP:
HOW TO GET SUPPORT WITH THE SET-UP VIA IT EXPERT ROLE DELEGATION

HOW TO GET SUPPORT WITH THE SET-UP VIA IT EXPERT ROLE DELEGATION

Step 1

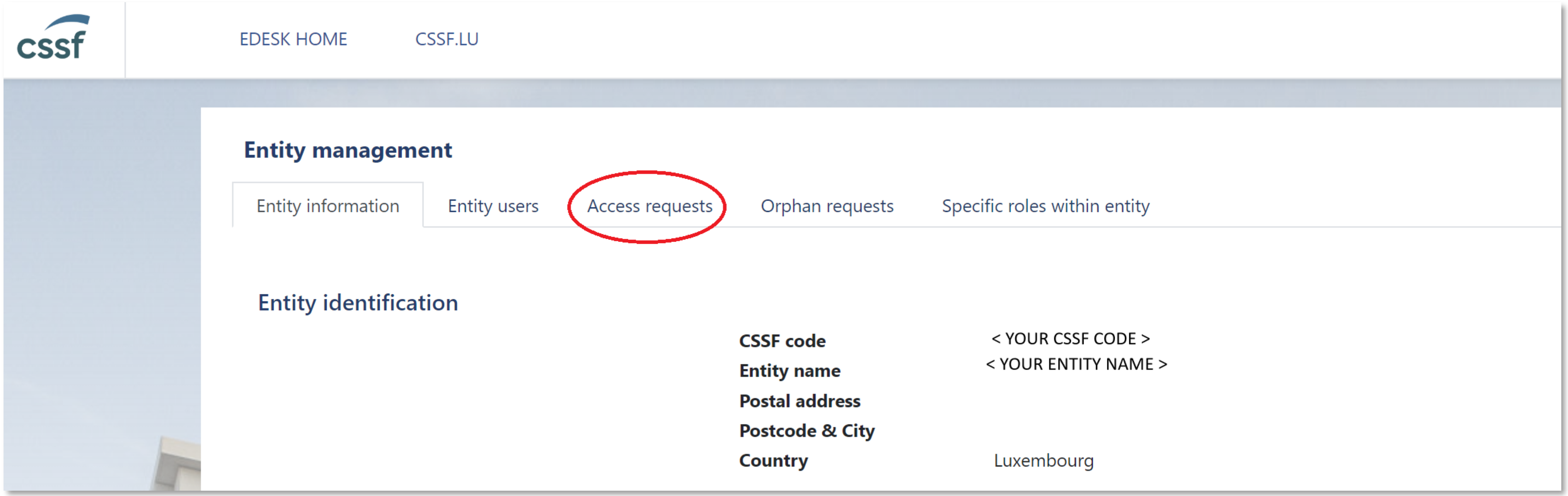
- Log into e-desk with the Advanced User account using your LuxTrust Device and Password. Please note that these changes can only be implemented from the Advanced User account
- Once logged in, go to the top right corner of the screen, click on your account user name, and select ‘Entity Management’



HOW TO GET SUPPORT WITH THE SET-UP VIA IT EXPERT ROLE DELEGATION

Step 2

Select ‘Access Requests’ from the tabs at the top of the screen’



HOW TO GET SUPPORT WITH THE SET-UP VIA IT EXPERT ROLE DELEGATION

Step 3

- As FE fundinfo will have made a request to connect from our Fundsquare account, you will see us on a list of users requests to connect with your entity.
- You will be able to identify our request as it will be with the LuxTrust SN: 100115278245548987357

Entity management

Entity information | Entity users | Access requests | Orphan requests | Specific roles within entity

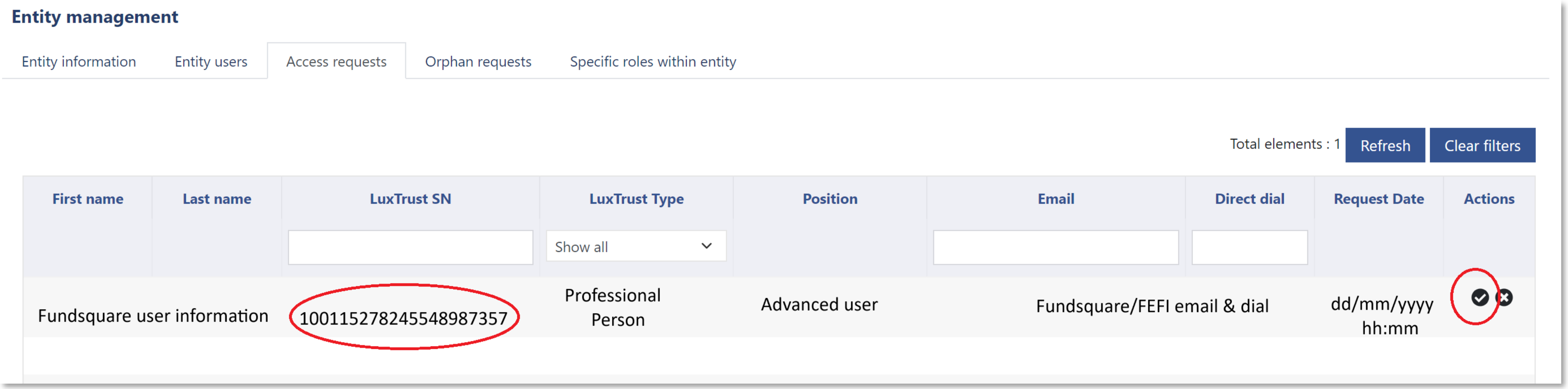
Total elements : 1 Refresh Clear filters

First name	Last name	LuxTrust SN	LuxTrust Type	Position	Email	Direct dial	Request Date	Actions
			Show all					
Fundsquare user information		100115278245548987357	Professional Person	Advanced user	Fundsquare/FEFI email & dial		dd/mm/yyyy hh:mm	

HOW TO GET SUPPORT WITH THE SET-UP VIA IT EXPERT ROLE DELEGATION

Step 4

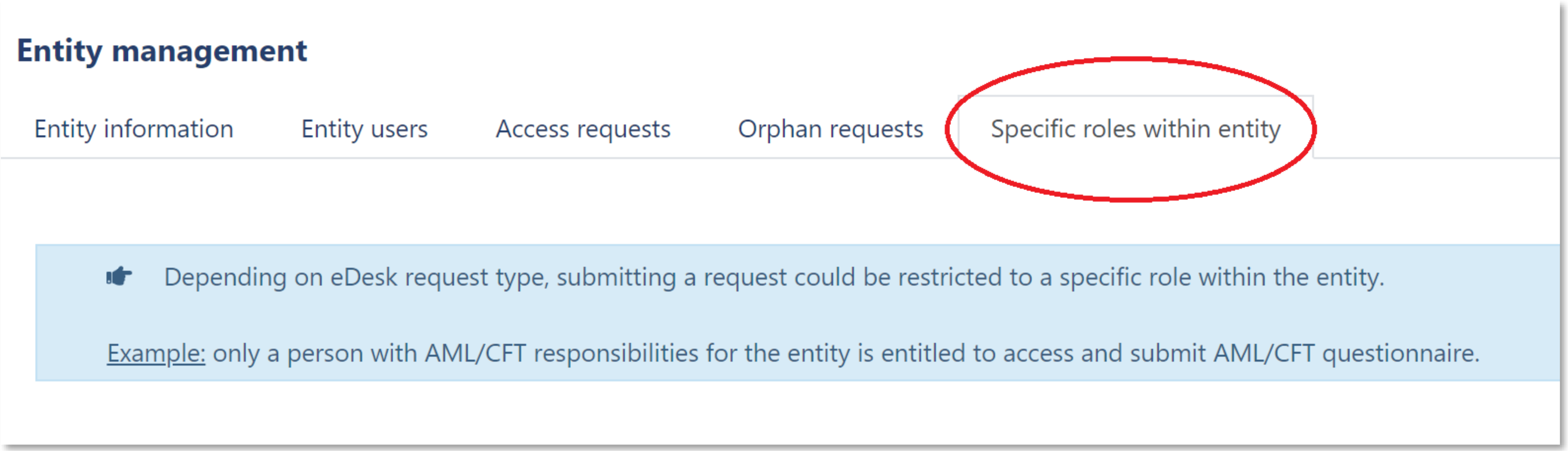
- Once you have identified the FE fundinfo request from our Fundsquare account, you can go to the far right of the screen and select ‘ACCEPT ACCESS’ or ‘REJECT ACCESS’.
- Remember to only accept requests and provide access to users you are associated with. You will need to ‘ACCEPT ACCESS’ on our request



HOW TO GET SUPPORT WITH THE SET-UP VIA IT EXPERT ROLE DELEGATION

Step 5

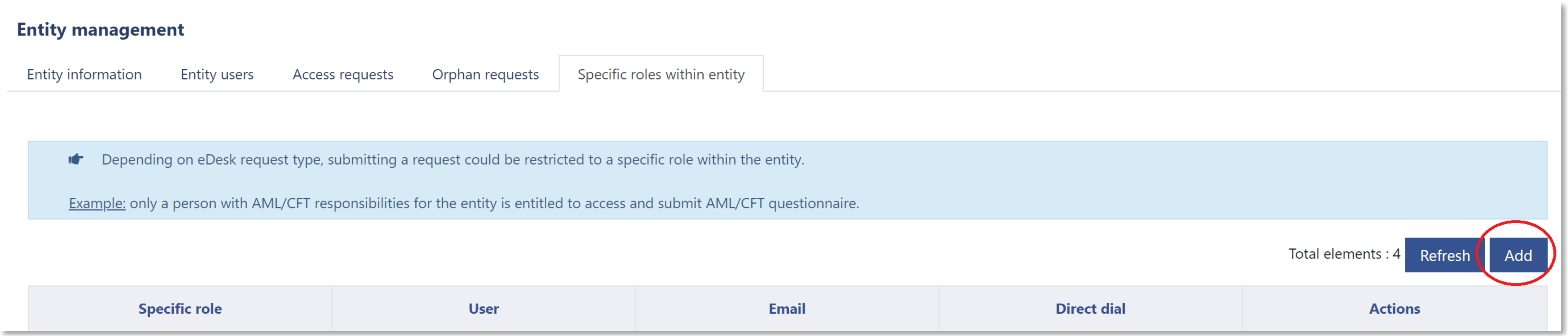
Once you have clicked accept, go to the ‘Specific roles within entity’ tab



HOW TO GET SUPPORT WITH THE SET-UP VIA IT EXPERT ROLE DELEGATION

Step 6

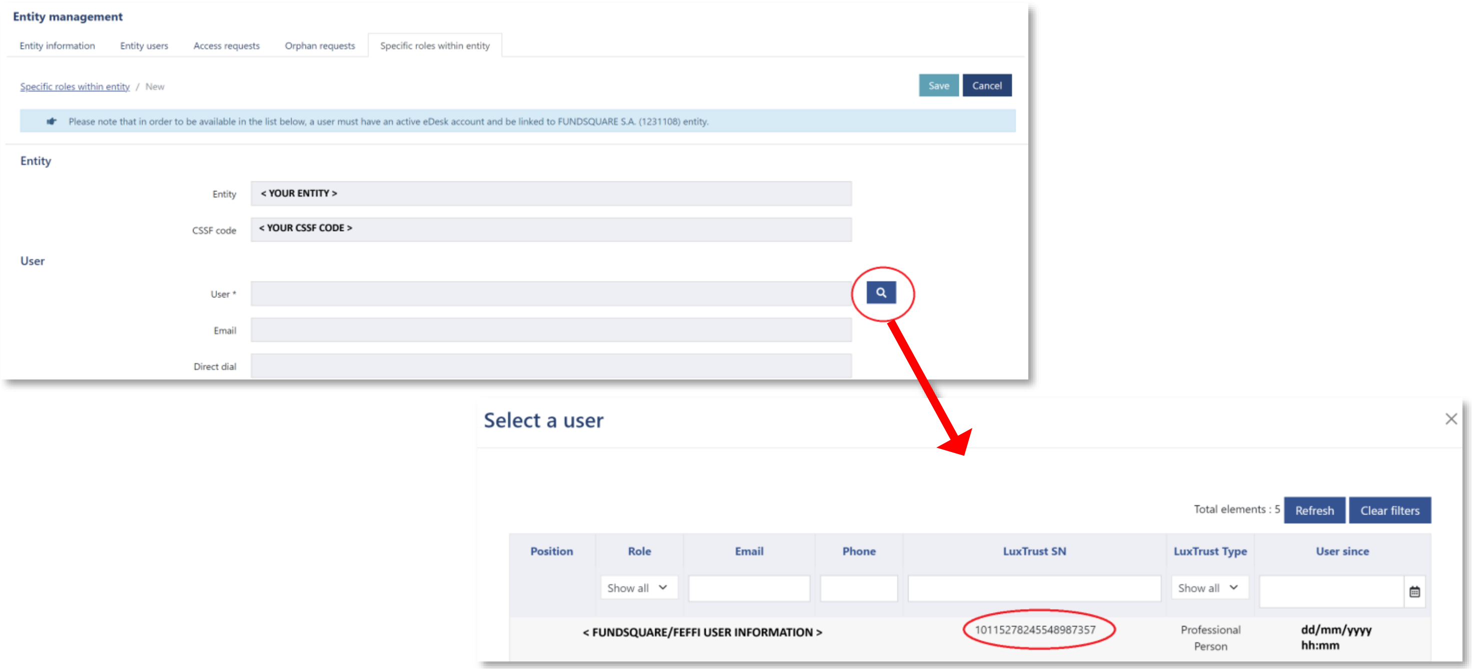
Under the ‘Specific roles within entity’ tab, on the right of the screen, click the ‘Add’ button:



HOW TO GET SUPPORT WITH THE SET-UP VIA IT EXPERT ROLE DELEGATION

Step 7

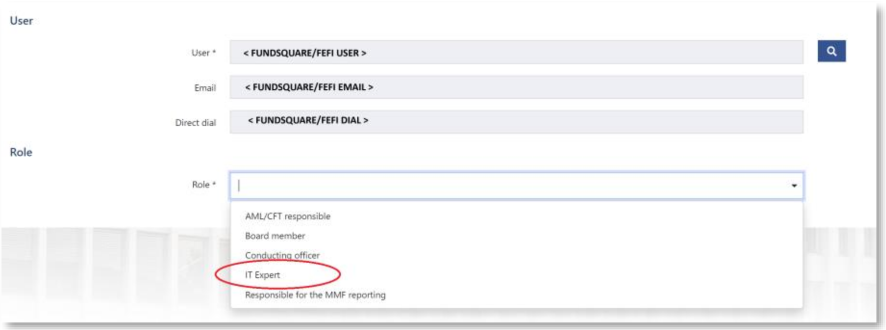
- You will now be able to click on the ‘User’ box and select a user within the list of approved users connected with your entity.
- One of these will be FE fundinfo’s Fundsquare account, select this option and the user details will populate automatically



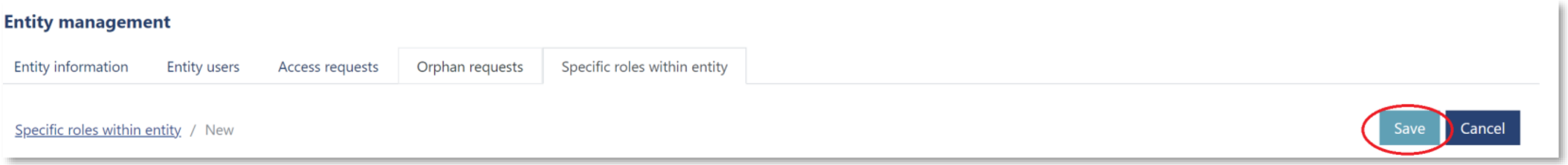
HOW TO GET SUPPORT WITH THE SET-UP VIA IT EXPERT ROLE DELEGATION

Step 8

- Now you can select a role for that user, in this case you will need to select IT EXPERT for FE fundinfo in the dropdown selection



- Click save on the top right to make the change



- Next steps will be the generation of the S3 key, detailed in section 3

TEMPORARY WORKAROUND OFFERING

FE FUNDINFO CAN OFFER A WORKAROUND TO ENSURE CONTINUITY

The model, the challenge and the workaround

- Reminder on the notification process with the CSSF:
  - The deposit of a notification is an “open model” where any delegate can act on behalf of any fund
  - In S3 for the notifications, there won’t be a bucket per fund, but a bucket per “sender”

- The CSSF channel change requires to set-up an environment in both eDesk and S3, which requires a secured access via a Luxtrust certificate for authentication

- In case the reception of a Luxtrust certificate takes too long to ensure client readiness by the beginning of 2024, FE fundinfo can propose a temporary workaround:
  - Usage of the Fundsquare own bucket in S3 to ensure continuity
  - When client S3 environment is ready: switch from FSQ to client bucket – which requires the onboarding of the client own S3 bucket key

Q&A

Diana Cutolo, Maxime Aerts and Annael Fleury

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RECORDINGS AVAILABLE

Changes to the CSSF's AIFMD Annex IV Filing Method (EN)

WATCH NOW

Modifications de la méthode de dépôt de l'annexe IV de la directive AIFMD de la CSSF (FR)

WATCH NOW

New reporting entity onboarding with e-file (EN)

WATCH NOW

> **For more information contact us at** enquiries@fefundinfo.com