CYPRUS SECURITIES AND EXCHANGE COMMISION

System for the Register of Express Trusts and Similar Legal Arrangements ('CyTBOR')

User Manual for access to CyTBOR by Obliged Entities (excluding credit institutions and financial institutions), in accordance with Article 61C (12) (b) of the Prevention and Suppression of Money Laundering and Terrorist Financing Law of 2007 (188 (I) / 2007)

Date: 05.04.2022

This is an unofficial English text. The official text is in the Greek language.

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2.0	10/03/2023	Document Review
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1. Introduction

This document presents the functions of the System to the end user who has access to CyTBOR as an 'Obliged Entity', with the exemption of credit and financial institutions, in accordance with Article 61C (12) (b) of the Prevention and Suppression of Money Laundering and Terrorist Financing Law of 2007, (188 (I) / 2007), as amended (the 'AML/CFT Law').

2. Horizontal Functions

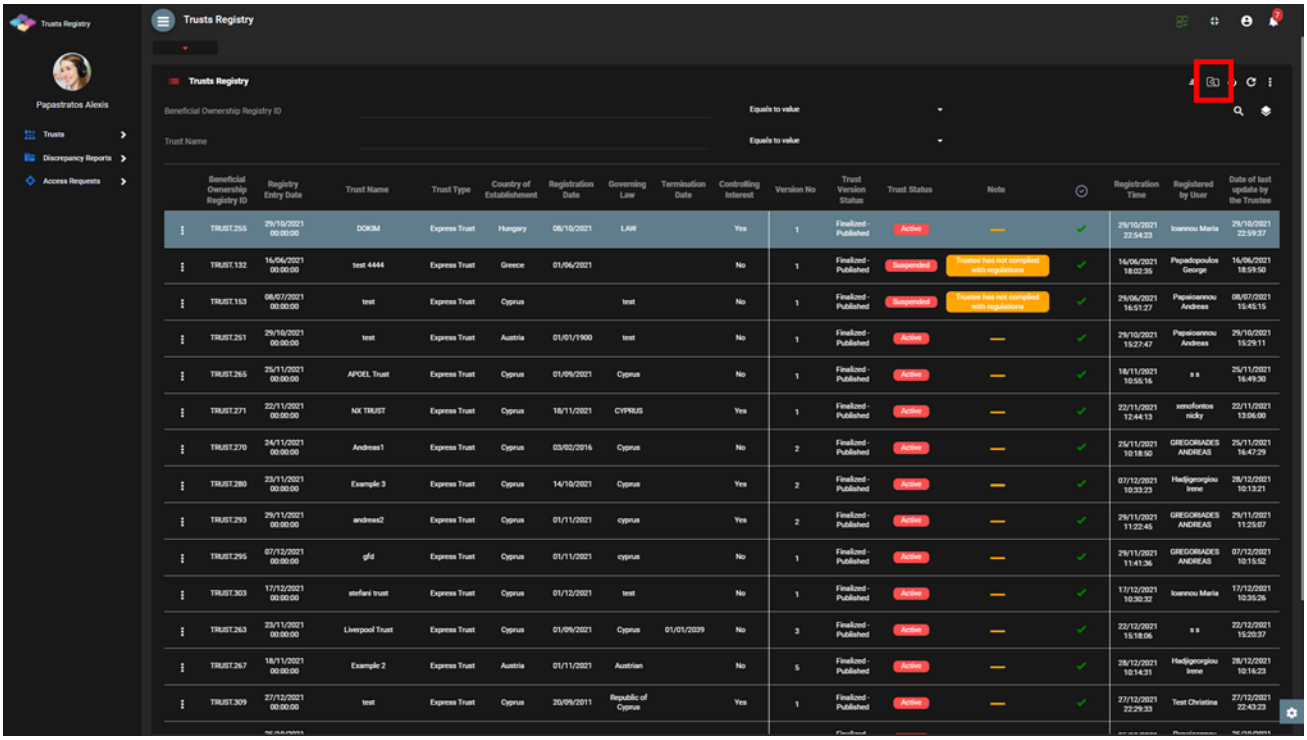
2.1. Common Functions in Lists

From each list of entries[1] the functions presented in the table below are provided. It is noted that the activation of these functions is dynamic, ie whether they will be provided in a specific list (as well as how they are provided) is determined by the App Designer, through the design tools of the platform[2].

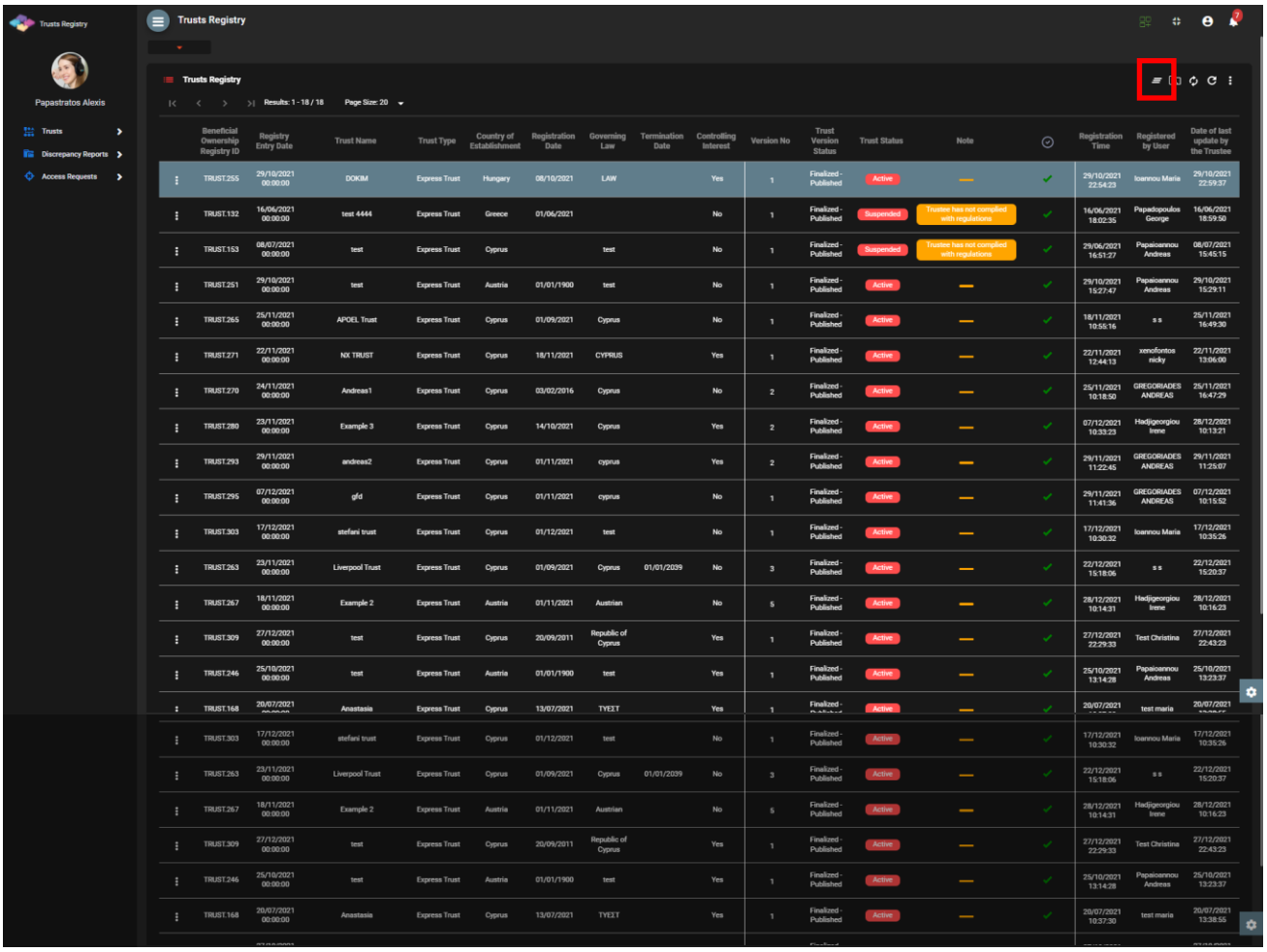
Mode	Button	Description
Quick search		By selecting the button from the list header, the system displays the criteria that can be used for quick search, and the user is asked to specify the search values and comparison operators. These criteria are always combined with an AND condition.
Paging		By selecting the button from the list header, the system displays the record paging options. The user can choose to go to the next or previous page, to the last or the first, as well as to change the number of entries that will be displayed on each page.
Cleaning Filters		By selecting the button from the list header, the list searches for entries without search criteria (filters) or sorting options
Re-execution		Selecting the button from the list header repeats the record search, and the system displays the recordings again.
Quicksort	-	Clicking on the name of a column in the list sorts the records based on that column, initially in ascending order. Clicking again on the name sorts in descending order.
Advanced Search		Advanced search is enabled by selecting the "Search" function from the options menu right at the top of the list. The system displays on a pop up screen the search criteria that can be applied. The user determines the search values per criterion, the operator with which the search will be applied as well as the way (condition) in which the search criteria (AND - OR) will be combined. Note that for each field type, different comparison operators are provided (eg for a numeric field a "Like" operator that is typically applied to an alphanumeric field cannot be applied)
Advanced Classification		Advanced sorting is enabled by selecting the "Sort" function from the options menu right at the top of the list. The system displays in the pop up screen the fields with which sorting can be applied. The user determines the order of the fields with which the sorting will be applied (with drag & drop) as well as the sorting order (ascending / descending) per field.

Below are indicative screens of the system for the above functions with a red indicator for each function.

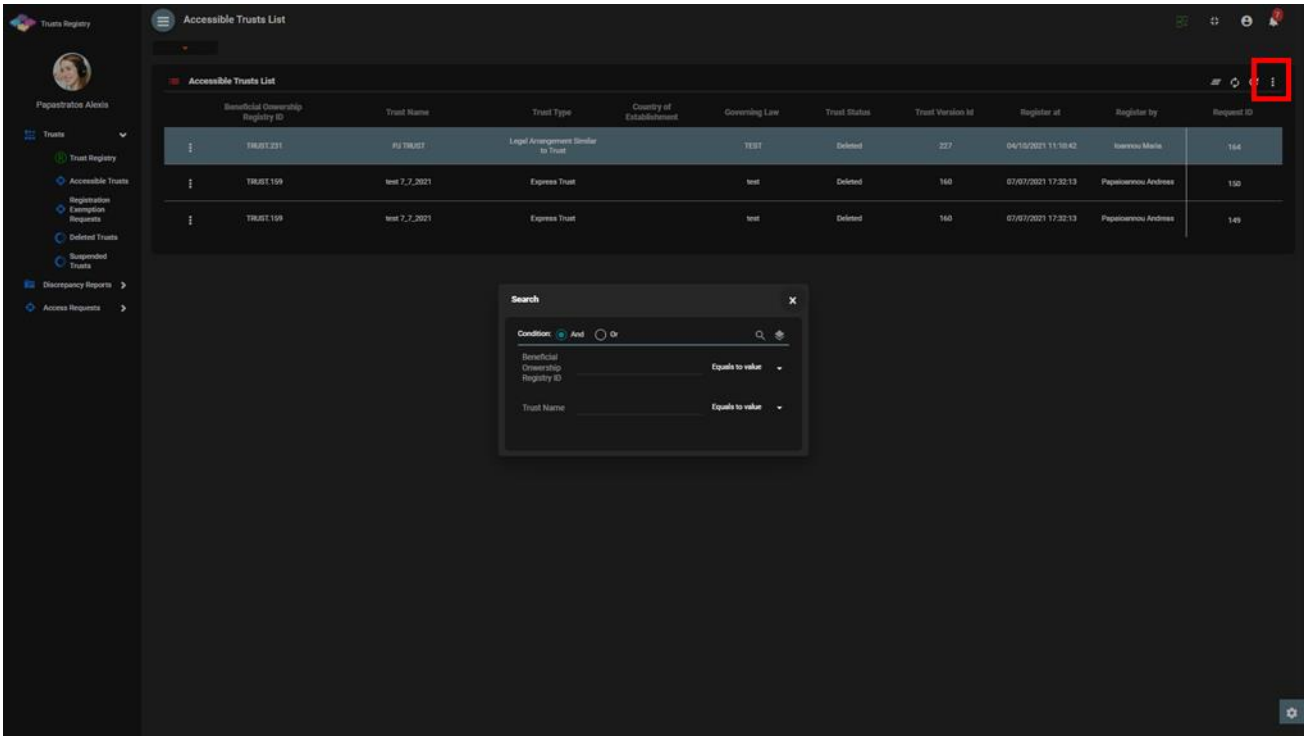
[1] In case these functions have been activated
[2] For this reason they may not all be visible in all the application lists of this project



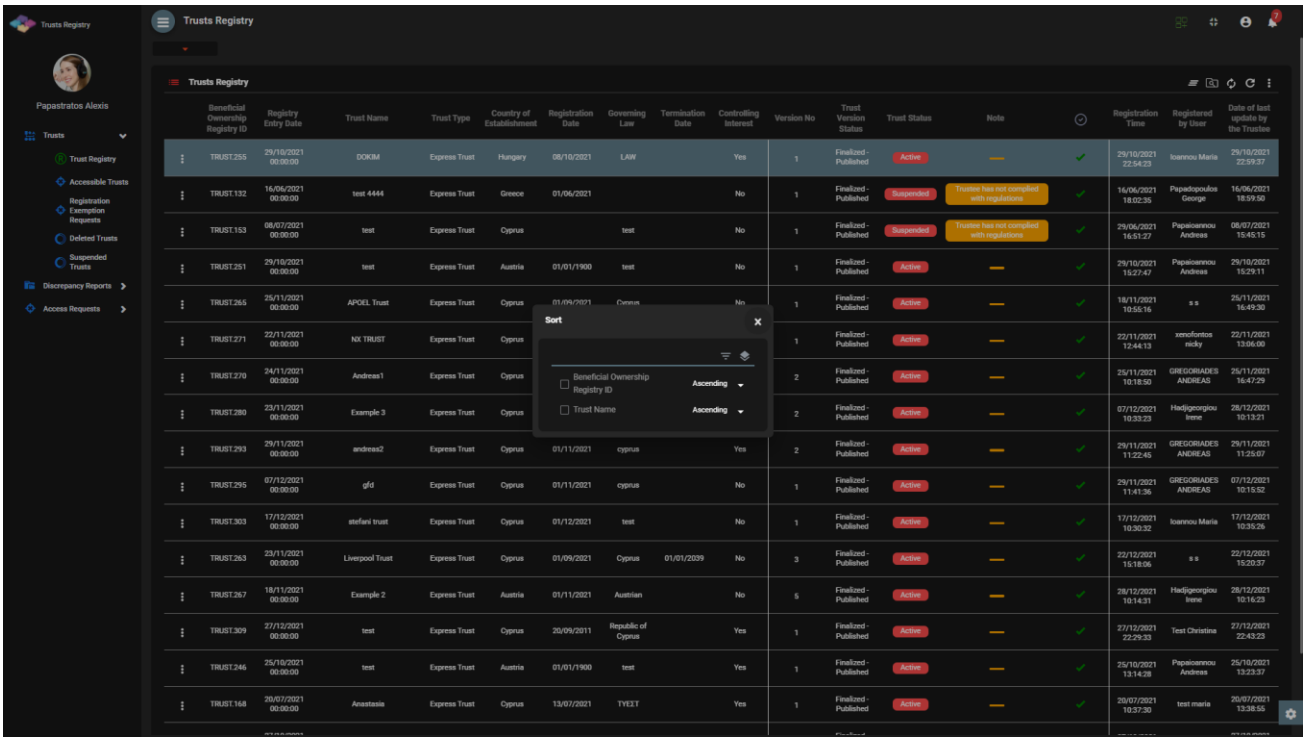
Quick Search Mode



Advanced Sorting Field Defining Function



Advanced Search Filters Defining Function

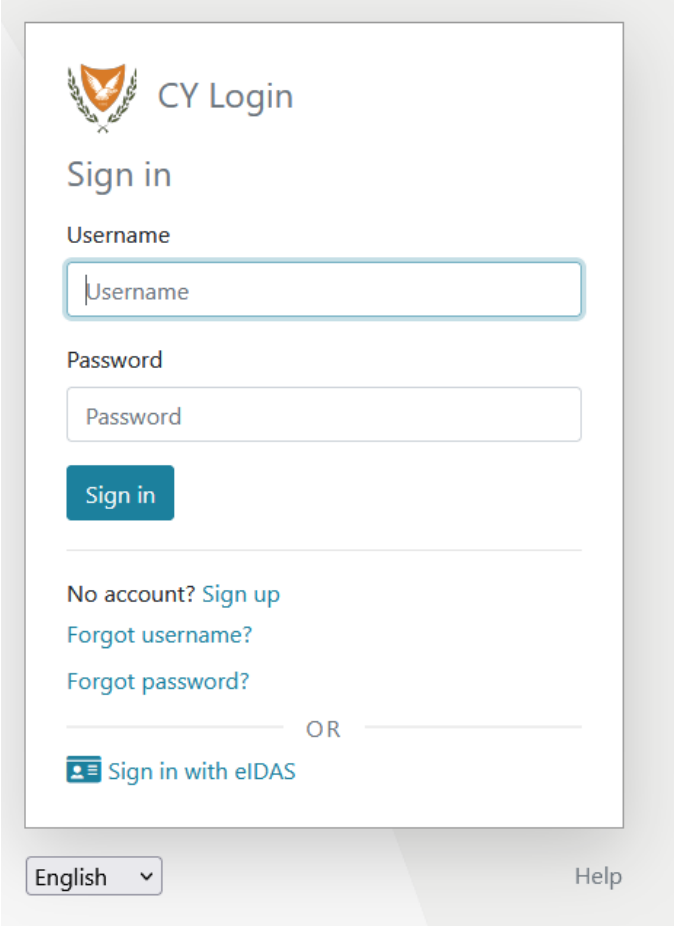


Advanced Sorting Field Defining Function

2.2. User Registration & Subscription Management functions

2.2.1. User Registration (Sign Up)

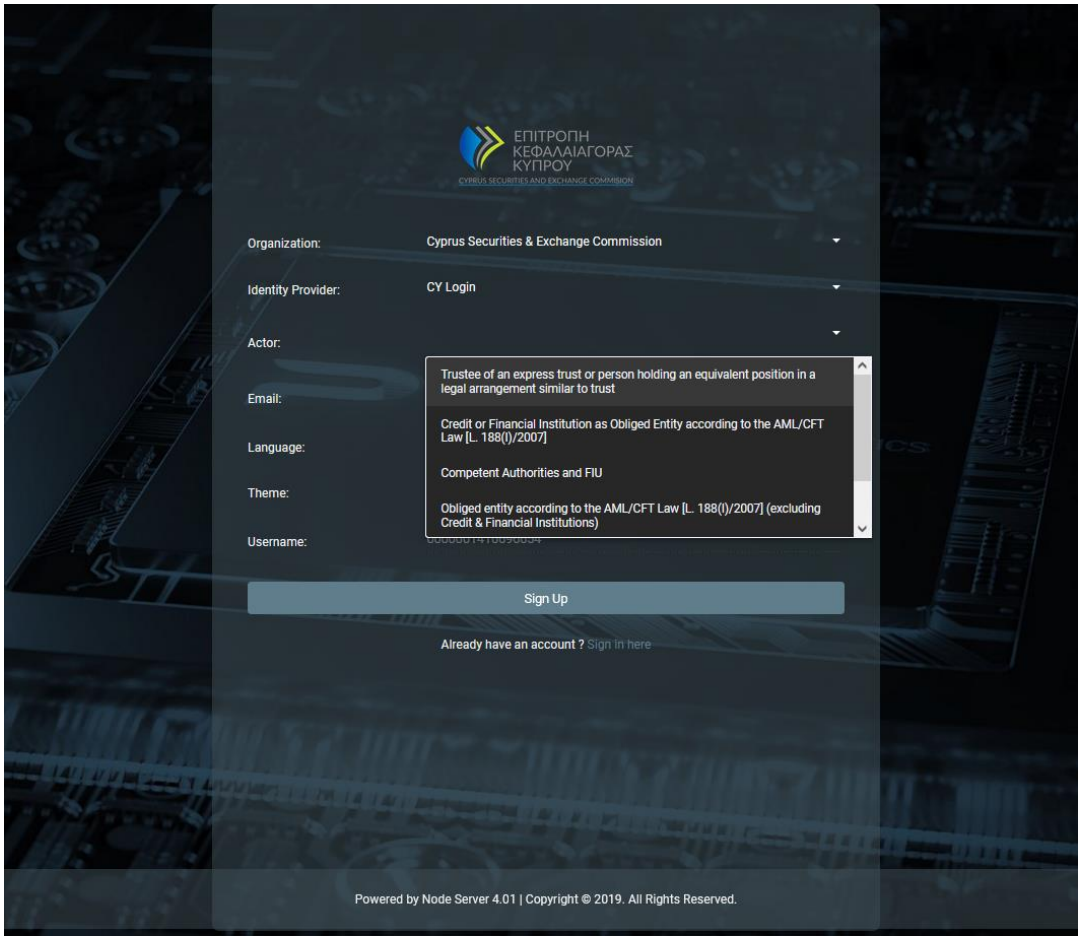
The user enters the system address (URL) and the system displays the login screen, where the user selects CY Login as the Digital Authentication service. The system refers the user to the relevant username & password page of CY Login so that he is authenticated.



CY Login Digital Authentication Page

Upon successful authentication, CY Login returns the user to the system, which searches for the user in its database. If it finds it, then it gives it access to the relevant applications (depending on its roles), if not, the system displays the user registration page of the platform. After the user provides the necessary information on the relevant forms, the system sends a relevant e-mail to activate the account. Also, if the user has chosen a role that requires the payment of the subscription, the relevant informative e-mail provides a notification for payment of the subscription.

A. User Registration Form (pop up)



User Registration Form

In the user registration form, the user must fill in the following information:

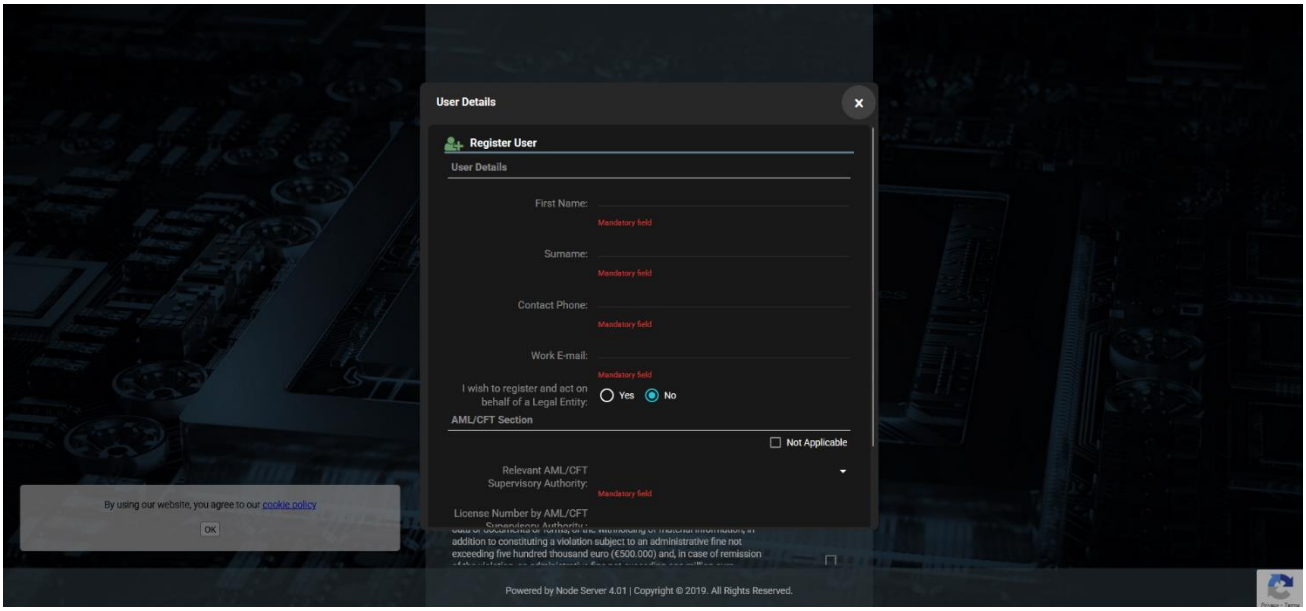
Field	Description
Organization	The organization (user group) to which the user wishes to register
Identity Provider	The Digital Authentication Service with which it wishes to be authenticated in the system *Note: The system displays the Digital Authentication Services to which the selected Organization is registered (Platform Authentication Service or connected LDAP Directories)*
Actor	The role in which the user wishes to register in the system *Note: The roles that appear in the selection list are those that the specific Organization has defined as directly accessible to external users (Public Actors)*
Subscription Policy	If subscription is required for the selected role, the user should select one of the available subscription policies provided by the system for that role (if only one is provided, then the field is not displayed, and is considered default by default)
Secondary Actor	The secondary role in which the user wishes to register with the system *(field is displayed if such a feature is provided for the primary role)*
Secondary Subscription Policy	If subscription is required for the selected sub-role, the user must select one of the available subscription policies provided by the system for the specific (sub-role) (if only one is provided, then the field is not displayed, and is considered default by default)
E-mail	The user's email address

	Note: The above address should be unique to the system for the selected Organization and Digital Authentication Service
Lanuage	The presentation language of the system screens desired by the user
Username	The unique user ID from cyLogin. The field is locked and cannot be modified.
Person	Details of the registered user (see pop up B below)
Confirmation & Acknowledgment Messages	If required for the role (or roles) requested by the registered user to confirm or accept some data, similar messages are displayed in the form of a check box

Public roles available in the system (for external user):

Code	Name
C_NATURAL_LEGAL	Natural or legal person that can demonstrate a legitimate interest [Section 61C (12) (c) of the AML / CFT Law] or Natural or Legal Person on the basis of section 61C (12) (d) of the AML / CFT Law, other than Trustee or Obliged Entity.
C_OBLIGED_BANK	Credit or Financial Institution as an Obliged Entity according to section 2A of the AML / CFT Law
C_TRUSTEE	Trustee of an express trust or person holding an equivalent position in a legal arrangement similar to trust
C_OBLIGED	Obliged Entity according to section 2A of the AML / CFT Law (excluding Credit & Financial Institutions)
C_COMPETENT	Authorities / FIU, as per section 61C (12) (a) of the AML / CFT Law

B. Natural Entity Form (pop up)



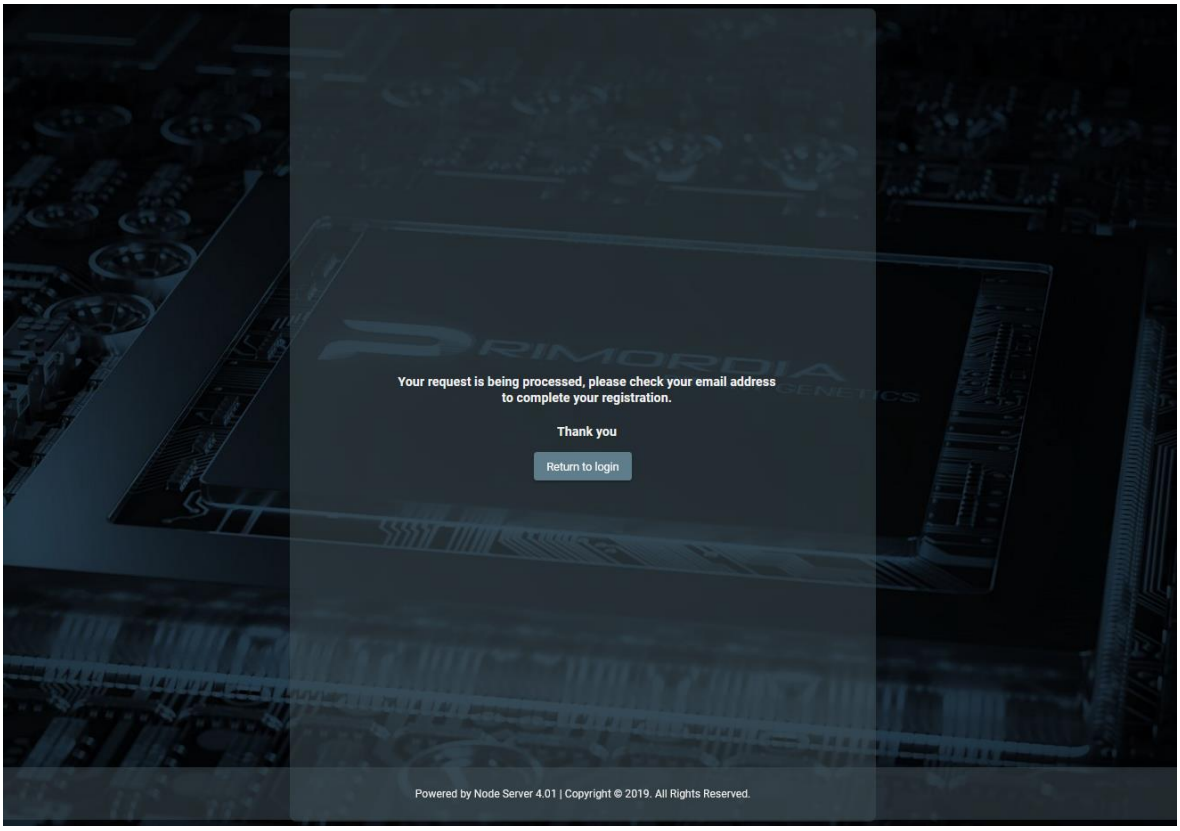
Individual Data Entry Form

In the Natural Person registration form the user must fill in the following information:

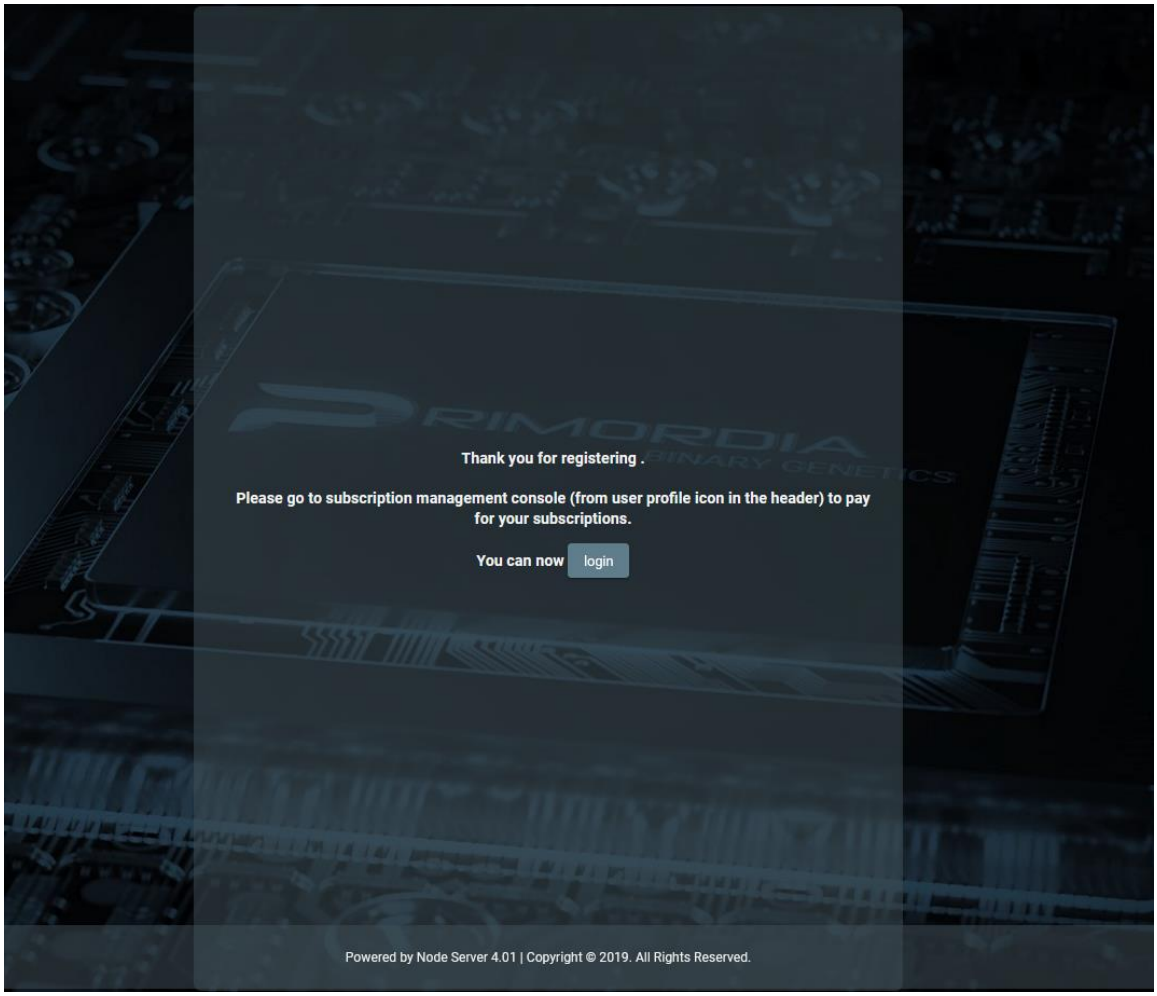
Field Name	Field Type	Shows up	Mandatory	Remarks
Person Section				
Name	Text field	YES	YES	Name
Surname	Text field	YES	YES	Last name
Contact Phone	Text field	YES	YES	Contact Phone
Work E-mail	E-mail field	YES	YES	Working E-Mail
I wish to register and act on behalf of a Legal Entity	Check box YES / NO (check box)	YES	YES	I wish to register and use the system on behalf of a Legal Entity *The field has a default value of NO. If YES value is selected, the fields related to the Legal Entity are also displayed*
Obliged Entity Type	Options menu with Obliged Entity Types	Under conditions	YES (if displayed)	Obligatory Entity Type *The field is displayed if an Obliged Entity role is selected (2 roles available). The options also change depending on the selected Obliged Entity role*
Select Competent Authority	Options menu with Competent Authorities (excluding CySec)	Under conditions	YES (if displayed)	Competent authority *The field is displayed if a Competent Authority role is selected*
Legal Entity Section	The whole section is displayed if YES value is selected in the field «I wish to register and act on behalf of a Legal Entity»			

	Note:*If a Competent Authority role is selected the field is not displayed but the Person is automatically associated with the Legal Entity selected as a Competent Authority (all competent authorities have already been passed to the base as Legal Entities)*			
Full Legal Name	Text field	YES	YES	Full Name
Registration Number	Text field	YES	Under conditions	Registration number *The field is required if a role other than Competent Authority or Cysec is chosen*
Country of Registration	Menu options with database countries	YES	YES	Country of Registration *Depending on the role to be selected the field receives a default Cyrpus value and locks*
City	Text field	YES	YES	City
Post Code	Text field	YES	YES	Postcodes
Address	Text field	YES	YES	Address
Number	Text field	YES	YES	Number (Street)
Tax ID	Text field	YES	YES	Tax Identification Number
AML / CFT Section	The whole section is displayed depending on the selected role			
Relevant AML / CFT Supervisory Authority	Options menu with available Supervisory Authorities	Under conditions	YES (if displayed)	AML / CFT Supervisory Authority *In the case of an Obliged Entity role the available options change depending on the Obliged Entity Type selected* *At the same time, the check box "Not in List" appears.*
Relevant AML / CFT Supervisory Authority	Text box	Under conditions	YES (if displayed)	AML / CFT Supervisory Authority *The field is displayed if a YES value is selected in the Not in List check box*
Country of AML / CFT Supervisory Authority	Menu options with database countries	Under conditions	YES (if displayed)	Country of AML / CFT Surveillance Authority *The field is displayed if a YES value is selected in the Not in List check box*
License Number by AML / CFT Supervisory Authority	Text field	Under conditions	YES (if displayed)	License Number from AML / CFT Supervisory Authority *The field is displayed when the section is displayed*

C. Registration Confirmation Screen



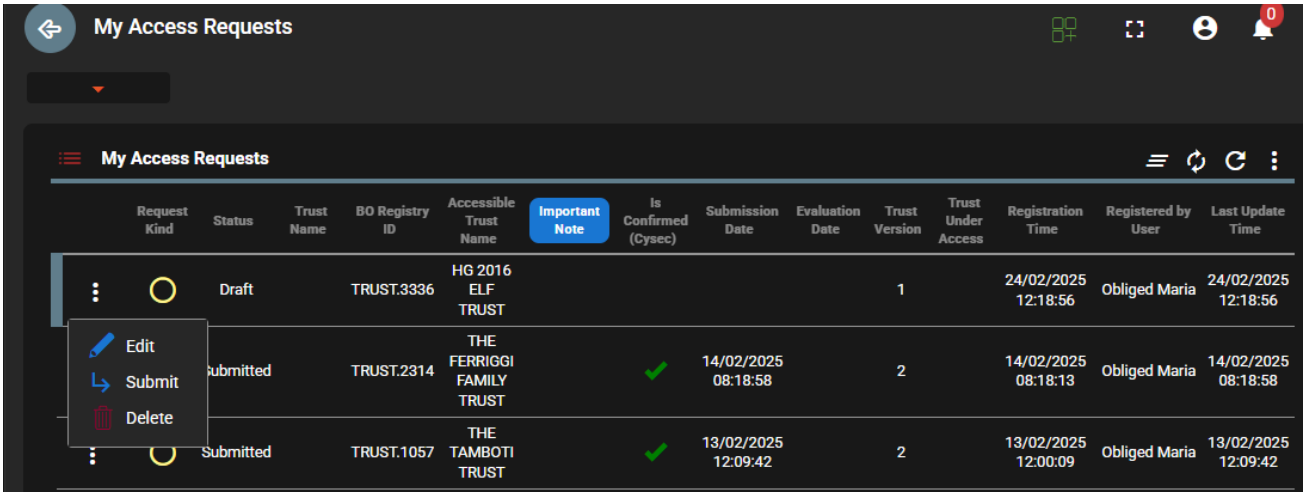
Email Message

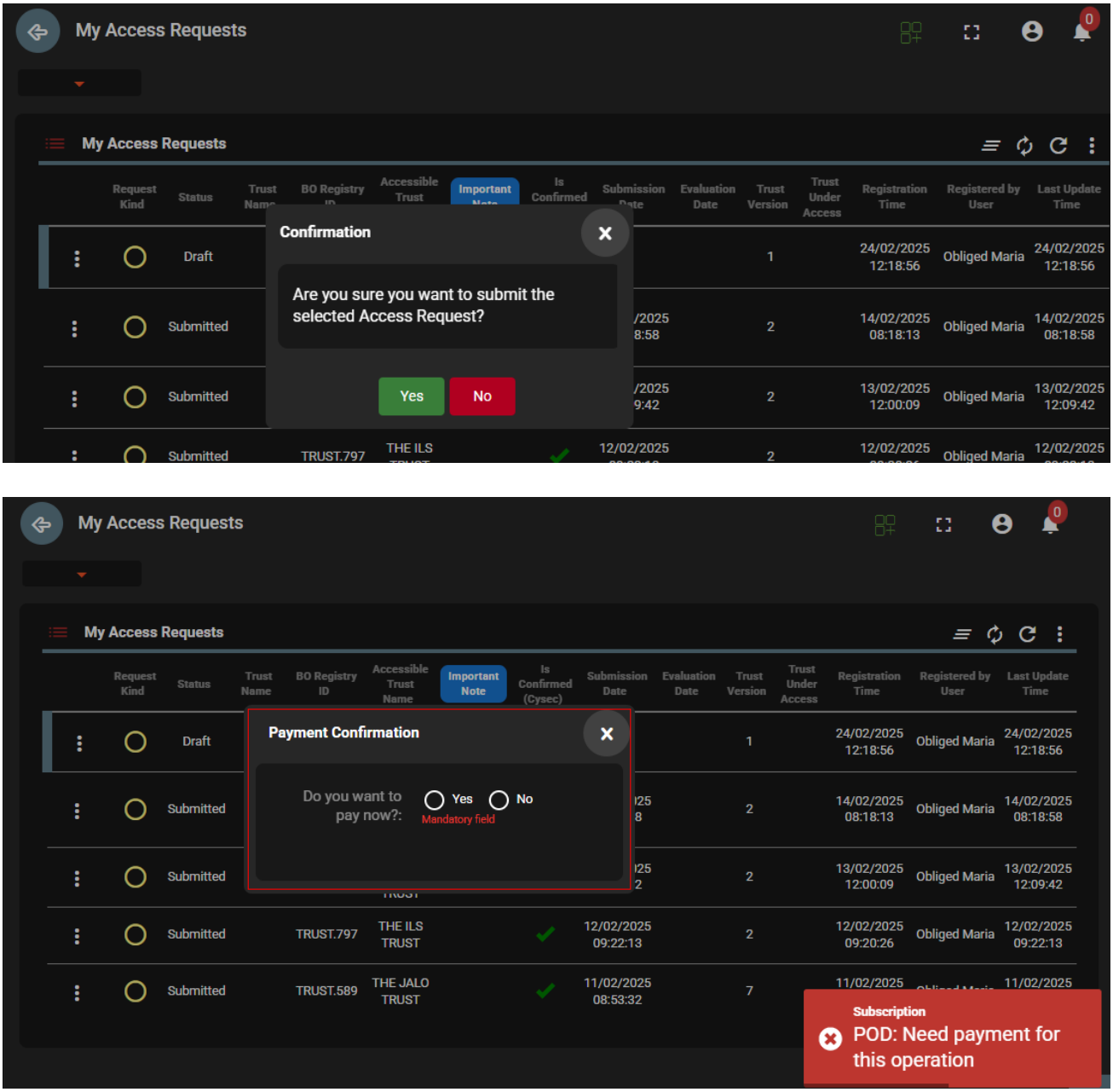


Email Confirmation Message. Complete User Registration

2.2.2. Payment on Depand

For access to an express trust or similar legal arrangement, the User selects the 'Submit' function at a record set level from 'My Access Requests' option in the menu. Upon activation of the 'Pay' function, the system redirects the User to the relevant Payment Gateway (JCC) page to provide their credit card details and complete the payment.

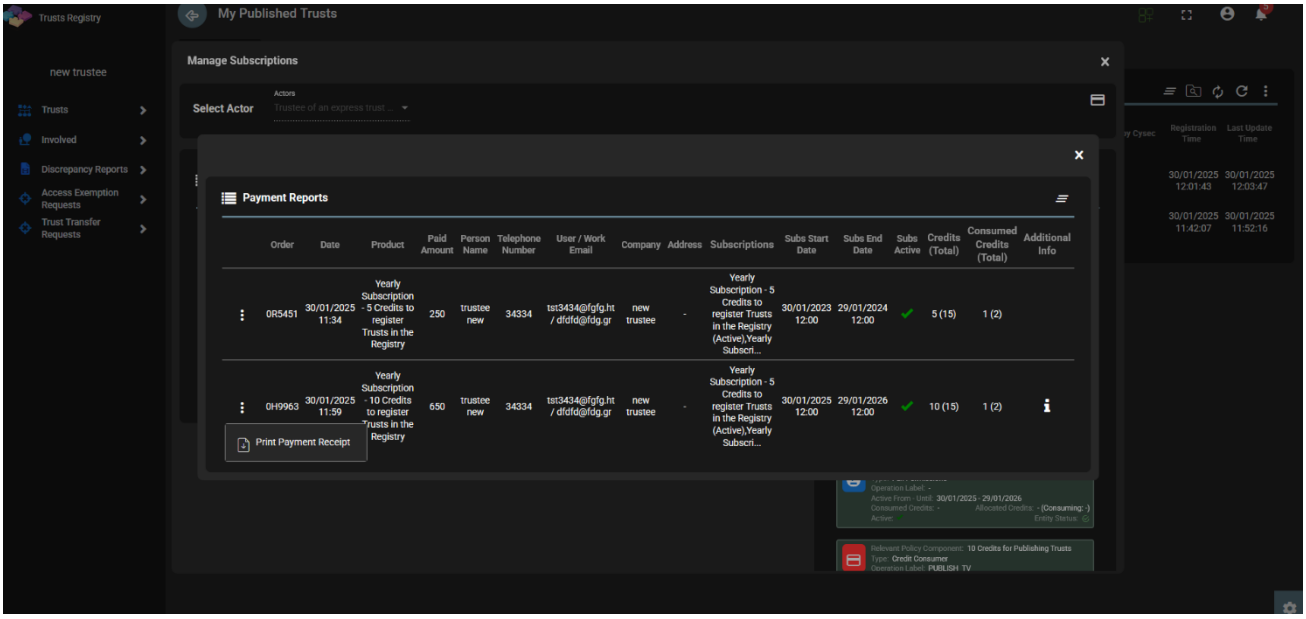




Payment Screen - Payment on Demand Mode

JCC Payment Form

The User may download and print a payment receipt for each payment he has made by selecting the 'Subscriptions' option from his profile and then selecting the 'Payments' icon '' as shown below:



Payment Report Screen

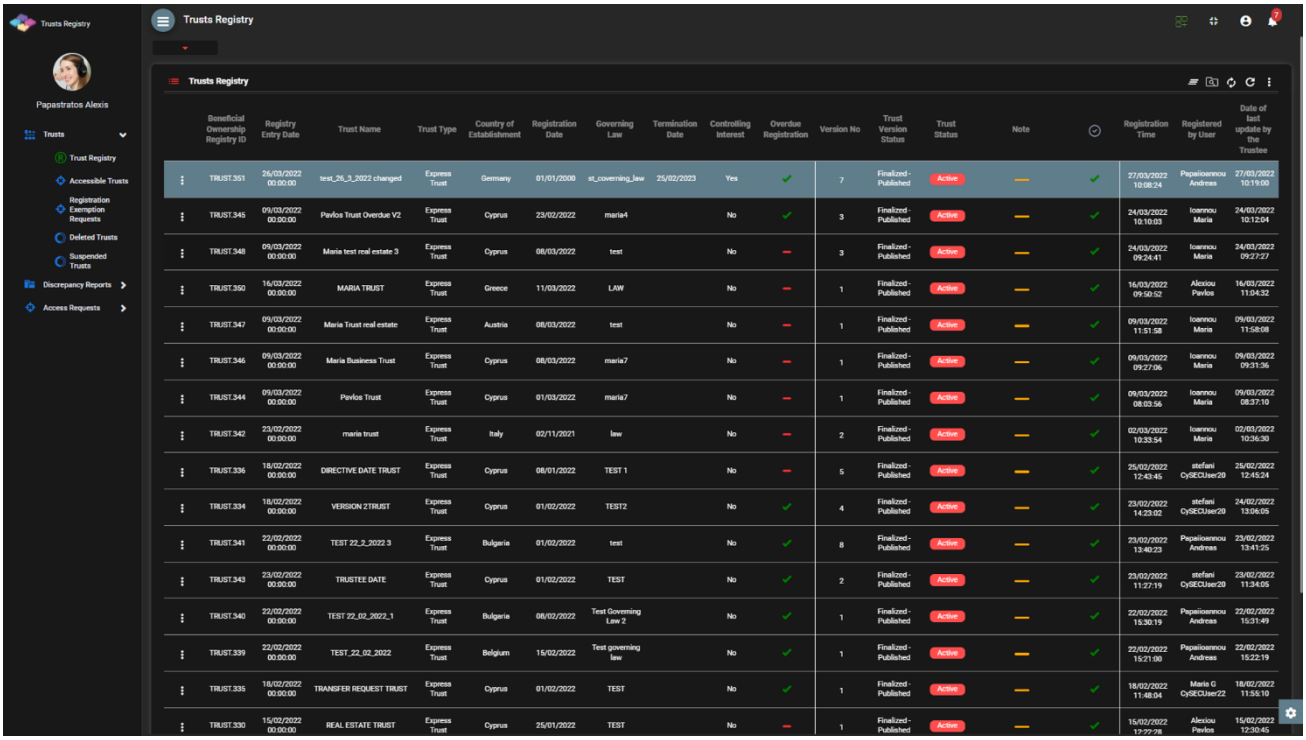
3. Access by Obliged Entities, excluding credit institutions and financial institutions, in accordance with section 61C (12) (b) of the AML / CFT Law

3.1 Menus

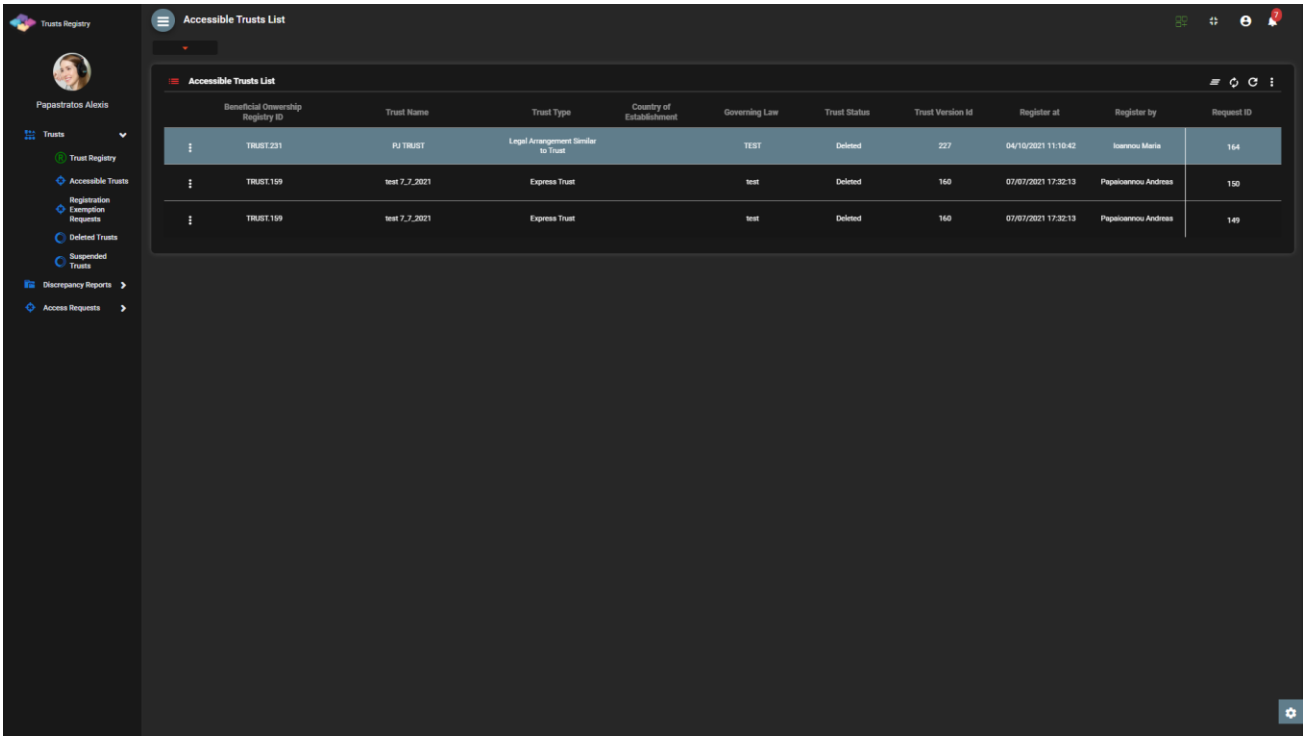
Upon entering the application, the user has access to the following data directories (menu on the left):

Menu	Description
Trusts Registry	This directory presents the latest editions of Active Registry Trusts that have been published. This list is essentially about the Register of Trusts.
Accessible Trusts	This directory presents all the latest versions of the active Registry Trusts that have been published, for Trusts that have been accessed by the user by approving an access request
Registration Exemption Requests	This list presents all the Requests for Exemption of Trust from the Register that have been confirmed by the Cyprus Securities and Exchange Commission.
Deleted Trusts	This list presents the Trusts that have been deleted from the Register.
Suspended Trusts	This list presents the Trusts that have been suspended.
My Discrepancy Reports	This directory presents the Discrepancy Reports submitted by a user.
My Access Requests	This directory presents the Trust Access Requests entered by a user.

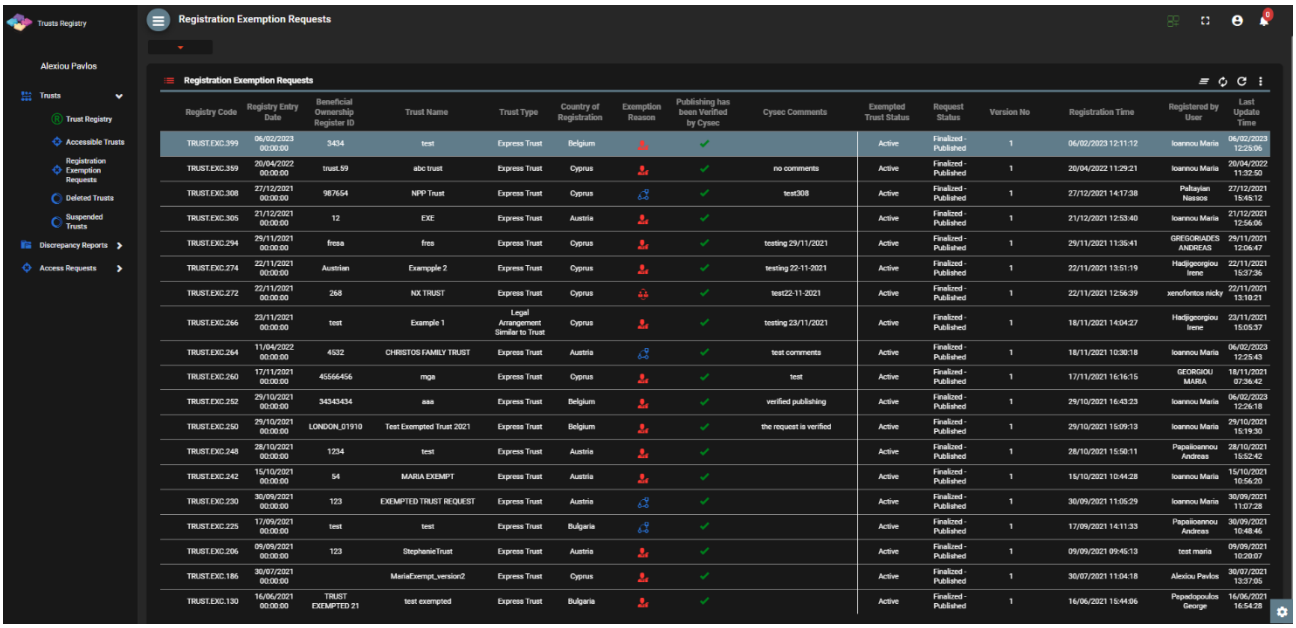
The following are indicative screens of the application directories:



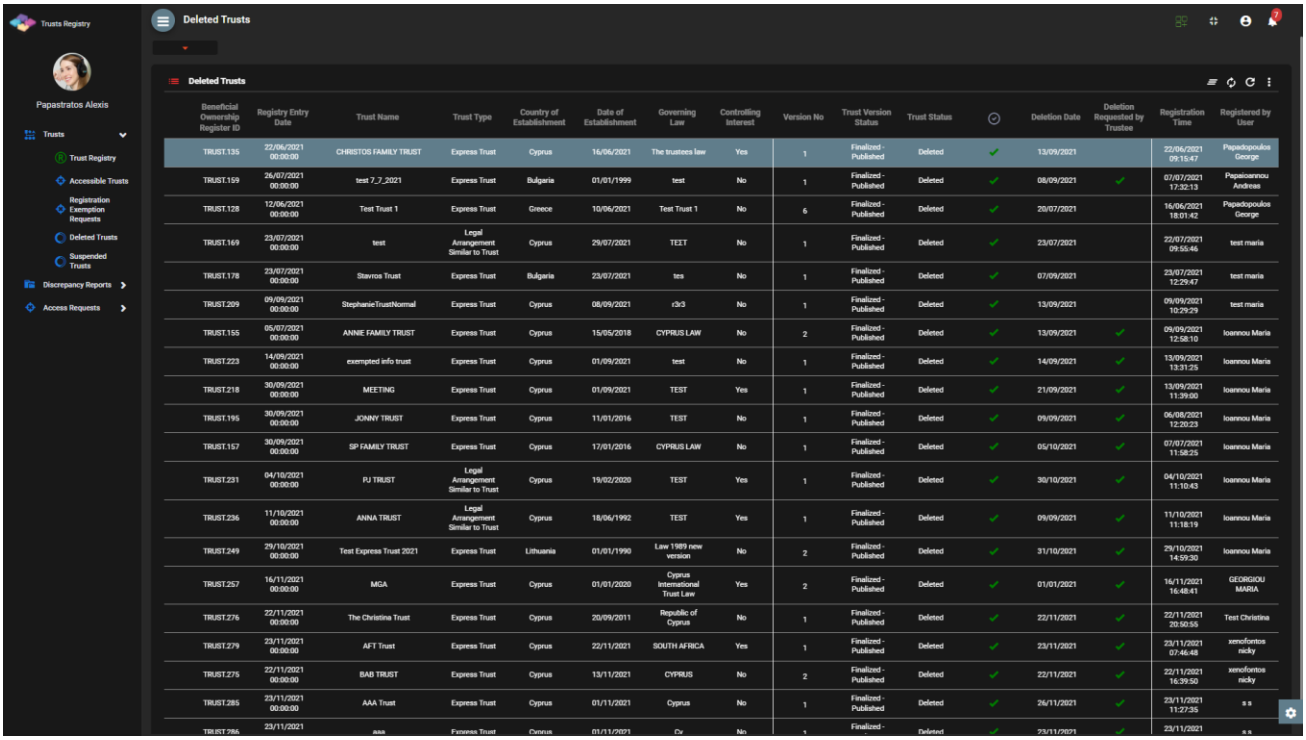
Catalog of Trusts Registry



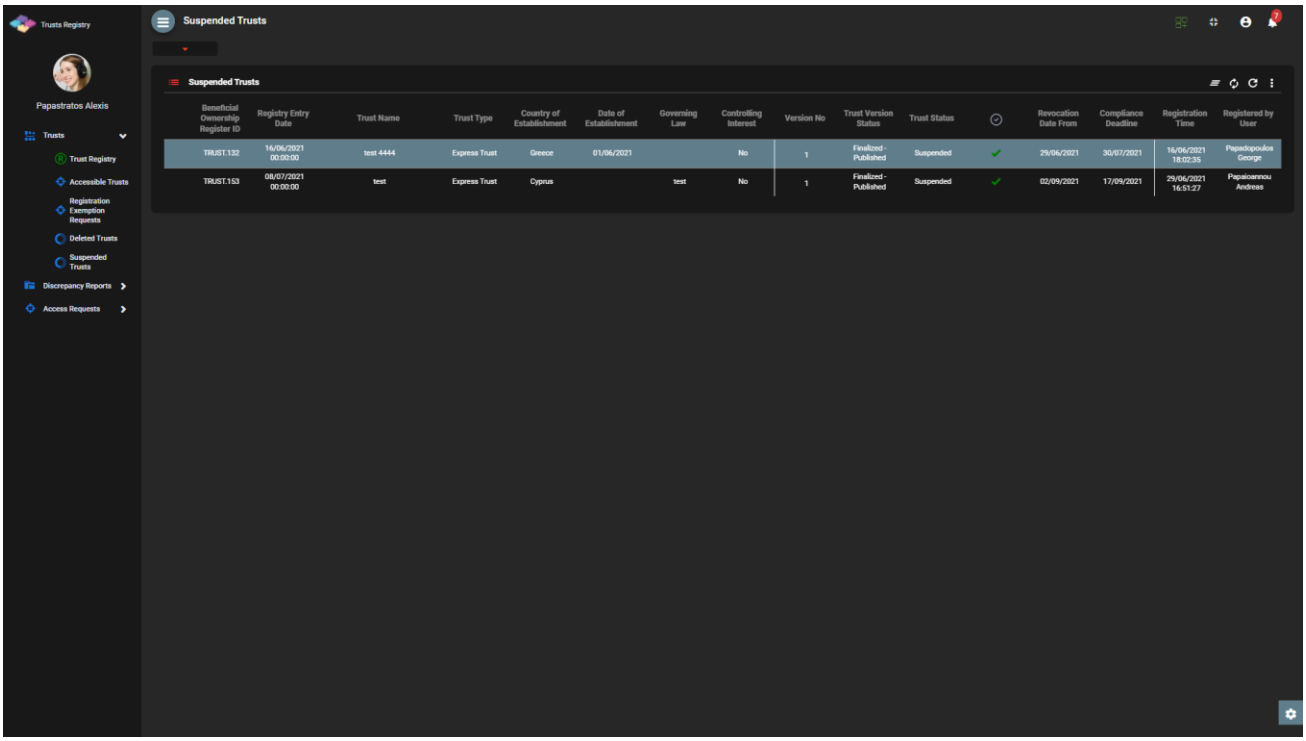
List of Accessible Trusts



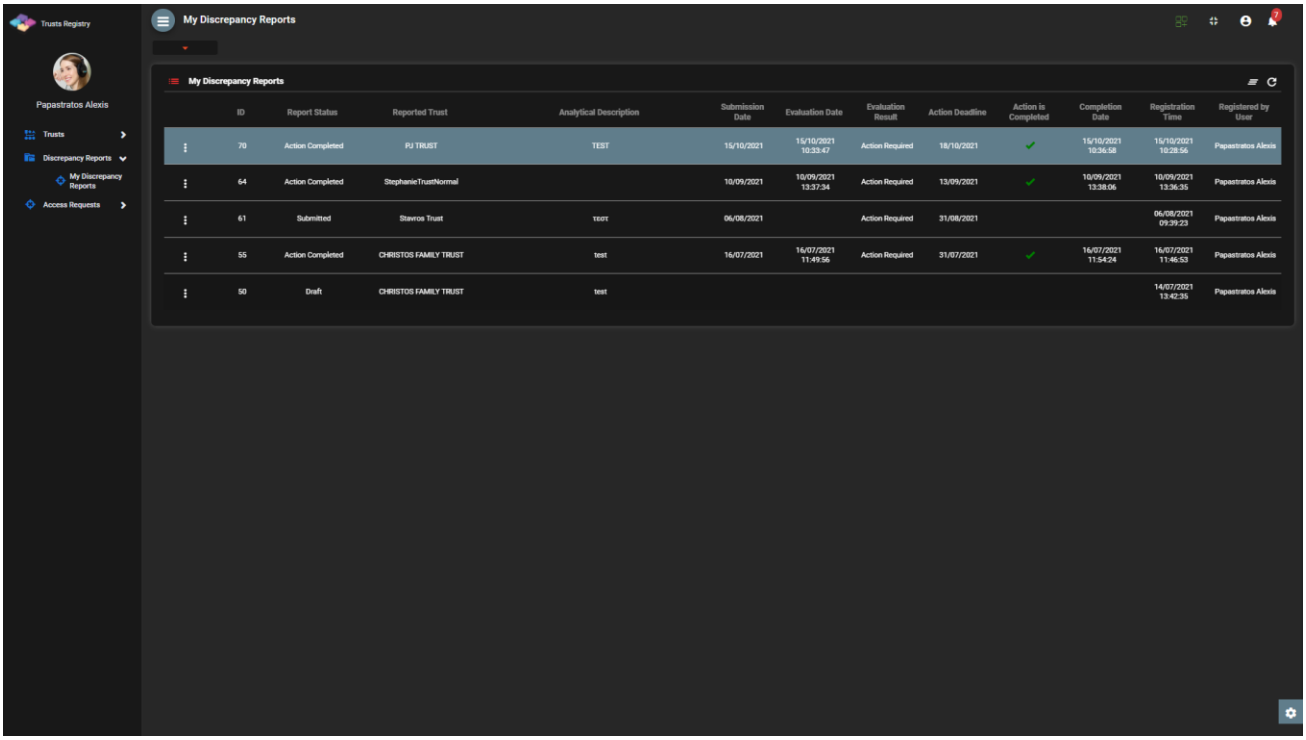
List of Exemption Requests from the Registry (Registration Exemption Requests)



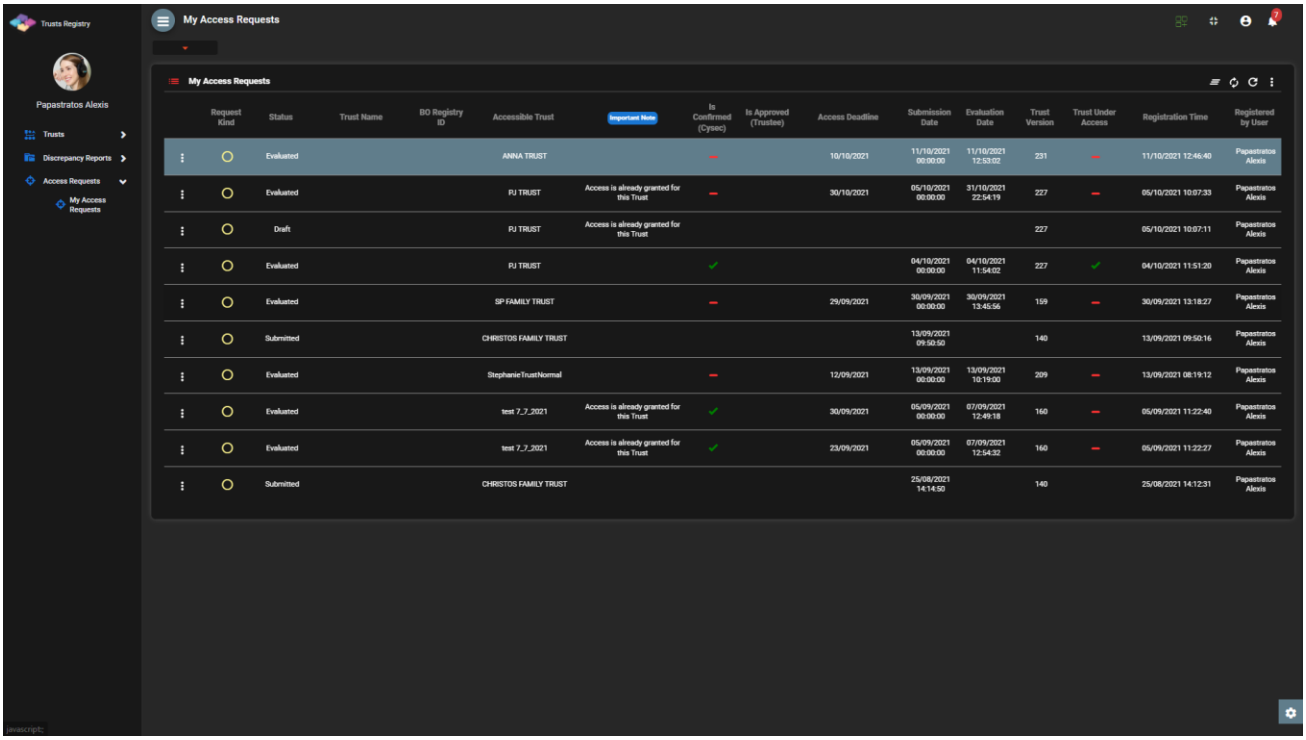
List of Deleted Trusts from the Register (Deleted Trusts)



List of Suspended Trusts



List of My Discrepancy Reports



List of My Access Requests

From the above directories, the following functions are provided (per directory):

Menu	Mode	Position	Reference
Trusts Registry	Request Access *Allowed only if the selected Trust is active in the Registry (ie not Suspended)*	Recordset	Chapter 3.4.1

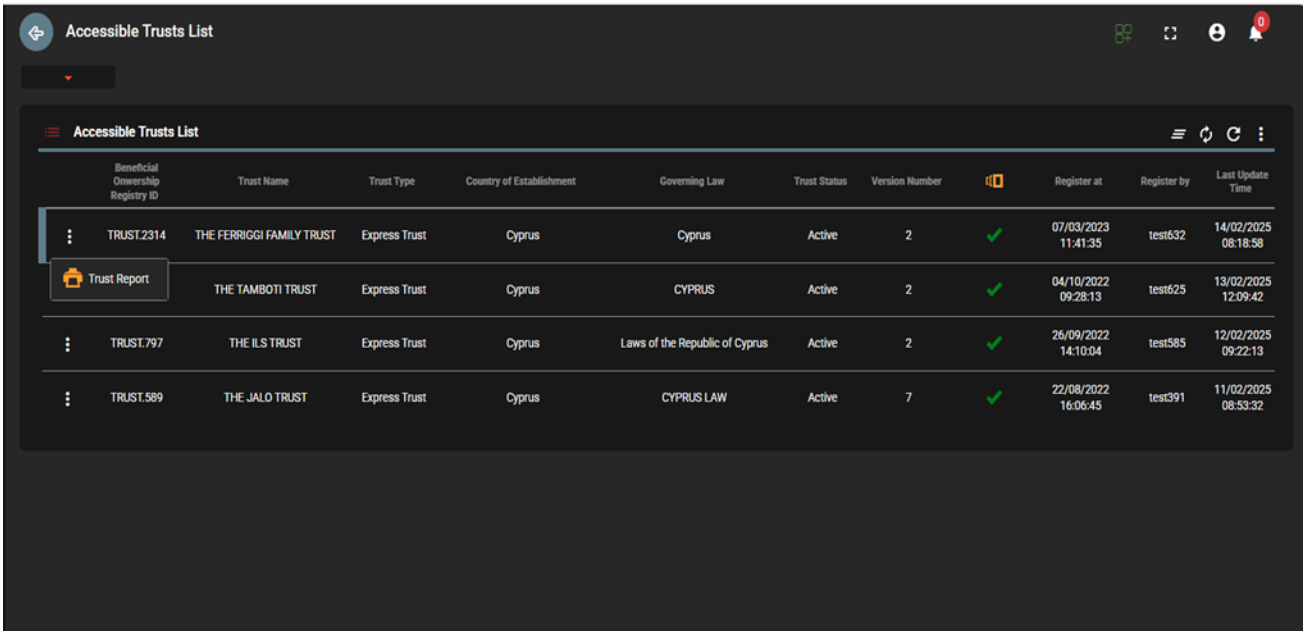
	File a Report (Discrepancy Report Entry)	Recordset	Chapter 3.3.1
Accessible Trusts	View Trust (Confidence Data Overview) *Please note that when accessed by Obliged Entities (excluding financial & credit institutions) and Natural / Legal Person, the list of Beneficial Owners presents only the data for which no access exemption has been requested (unlike in the case of credit or financial institutions as obliged entities show all relevant data).*	Recordset	Chapter 3.2.1
My Discrepancy Reports	Edit Report (Discrepancy Report Entry) *Allowed only if the report is in Draft mode*	Recordset	Chapter 3.3.1
	Submit Report (Submission of Discrepancy Report) *Allowed only if the report is in Draft mode*	Recordset	Chapter 3.3.2
	Cancel Report (Cancellation of Discrepancy Report) *Allowed only if the report is in Draft mode*	Recordset	Chapter 3.3.3
My Access Requests	Submit (Submit Request for Access) *Allowed only if the request is in Draft mode*	Recordset	Chapter 3.4.2
	Edit (Submission of Discrepancy Report in edit mode) *Allowed only if the request is in Draft mode*	Recordset	Chapter 3.3.1
	Delete (Delete Access Request) *Allowed only if the request is in Draft mode*	Recordset	Chapter 3.4.3

Provided Functions at Trust level per Directory

3.2. Registry Trust Management

3.2.1. Trust Report

Upon successful payment, the User may download a report with detailed information about an express trust or similar legal arrangement (provided that there is no accepted Access Exemption Request). This function is provided through the 'Accessible Trusts' in the menu and by selecting the 'Trust Report' option at a recordset level, as shown below:

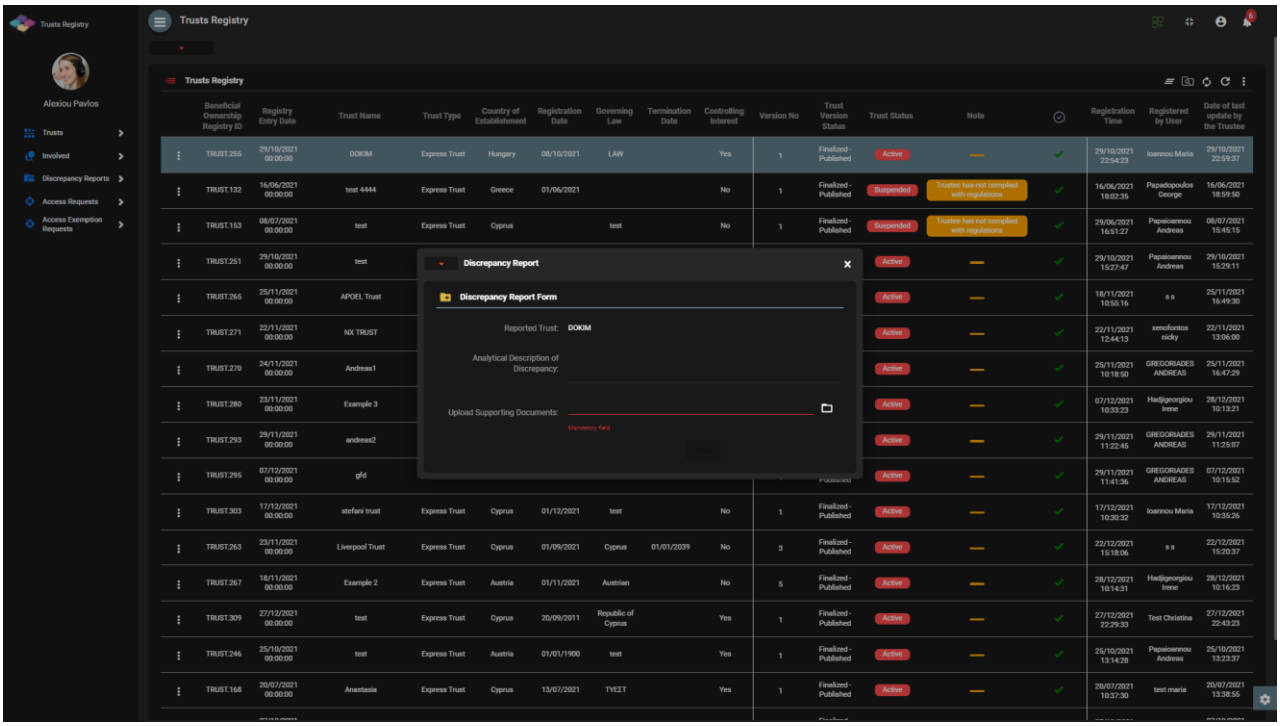


Trust Report

3.3. Discrepancy Report Management

3.3.1. File a Report

This function involves the registration of a Discrepancy Report by an appropriately authorized user.



Discrepancy Report Entry Screen (File a Report)

To enter a Discrepancy Report, the user must complete the following information:

Field Name	Field Type	Shows up	Mandatory	Remarks
Reported Trust	-	YES	-	Name of the Trust mentioned
Analytical Description of Discrepancy	Text field	YES	NO	Detailed description of Discrepancy
Upload Supporting Document	Select file from disk	YES	YES	Loading support document

The above card and function is also used in case the user wishes to update the details of the Discrepancy Report (edit form) from the My Discrepancy Reports directory.

The new Discrepancy Report entry is accessible from the "My Discrepancy Reports" directory

3.3.2. Submit Report

The purpose of this function is to submit a Discrepancy Report by the user who has registered it. When the function is activated, the system updates the status of the report to Submitted and sends a relevant notification notification to all users who have the role of Cysec Internal User or Cysec Registry Administrator.

The operation is performed in the background and has no screen.

The above function is allowed only if the selected Discrepancy Report is in Draft mode.

The report is now accessible by the Cysec Internal User and Cysec Registry Administrator roles for audit.

3.3.3. Cancel Report Cancel Report

The purpose of this function is to cancel (physically delete) a Discrepancy Report by the user who has registered it.

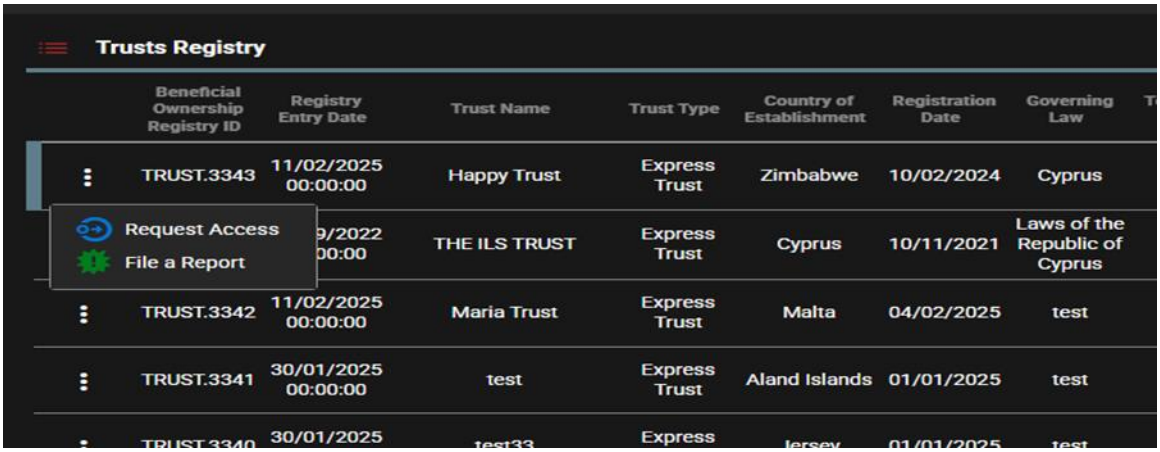
The operation is performed in the background and has no screen.

The above function is allowed only if the selected Discrepancy Report is in Draft mode

3.4. Access Request Management

3.4.1. Submit Request Access

This function concerns the registration of an 'Access Request' for an express trust or similar legal arrangement from the 'Trusts Registry' option in the menu, as shown below:



Trust Access Request Entry Screen

To submit an Access Request, the user must fill in the following information:

Field Name	Field Type	Shows up	Mandatory	Remarks
Accessible Trust	-	YES	-	Name of relevant Trust
BO Registry ID	-	YES		Number of relevant Trust
Access Description	Text field	YES	YES	Request description
We confirm that we are obliged entities according to the L.188(I)/2007, as amended and the purpose of the access relates exclusively to the taking of measures relating to customer due diligence and identification:	Confirmation message	YES	YES	
We acknowledge that the provision of false, or misleading information or data or documents or forms, or the withholding of material information, in addition to constituting a violation subject to an administrative fine not exceeding five hundred thousand euro (€ 500.000) and, in case of remission of the violation, an administrative fine not exceeding one million euro (€ 1.000.000), is also a criminal offence punishable, in the event of conviction, by imprisonment not exceeding five (5) years or by a fine, not exceeding three	Confirmation message	YES	YES	Confirmation *The field receives a default NAI value*

hundred and fifty thousand euro (€ 350,000) or both				

The above card and function is also used in case the user wishes to update the details of the Access Request (edit form).

The new Access Request registration is accessible from the "My Access Requests" directory.

3.4.2. Submit Request for Access (Submit)

The purpose of this function is to submit an Access Request from the User who has registered it. When the function is activated, the system displays an action confirmation pop up and in case of confirmation, changes the status of the request to "Submitted" and sends a relevant notification notification to all users who have the role of Cysec Internal User or Cysec Registry Administrator.

The above function is allowed only if the selected Access Request is in Draft mode.

3.4.3. Delete Request for Access (Delete)

The purpose of this function is the (physical) deletion of an Access Request by the User who has registered it.

The above operation is allowed only if the selected Trust is in Draft mode.