

## Annex 2

### 1. Format of information

XX\_yyyymmdd\_COMP-CIF

Column	Information	Format
A	Reference	<p>Unique sequential reference number in the following format: XXyyyymnnn</p> <p>XX – Investment Firm two capital letters code given by CySEC (same code used for TRS)</p> <p>yyyy – Year</p> <p>nnnn – Sequential number (starting from 0001 - i.e. AA20180001)</p>
B	Complaint_Date	Format in accordance with ISO standard 8601:2004 (yyyy-mm-dd)
C	Event_Date	Format in accordance with ISO standard 8601:2004 (yyyy-mm-dd)
D	Complainant_Full_Name	Complainant Surname and Name
E	Identification	ID or Passport Number
F	Complainant E-mail	-
G	Complainant_Country	Two Letter Code in accordance with ISO standard 3166-1 i.e. CY for Cyprus
H	Complaint_Cause	<p>Choose one of the following:</p> <ul style="list-style-type: none"> <li>- Execution of orders (e.g. delay in execution, re-quotes, slippage, erroneous trades etc.)</li> <li>- Investment advice (e.g unsuitable advice)</li> <li>- Portfolio management</li> <li>- Quality or lack of information provided to the client</li> <li>- Terms of contract/fees/charges</li> <li>- General admin/customer services (including custody/safekeeping services)</li> <li>- Unauthorised business being offered or carried out</li> <li>- Issue in relation to withdrawal of investor's funds.</li> <li>- Other (please specify in comments section below)</li> </ul> <p><b>The 'other' option should only be used after ensuring that the Complaint Cause does not fall under any of the above categories. If this option</b></p>

		<b>is used then a short and detailed description is expected in the 'Complaint Cause Comments'.</b>
I	Complaint_Cause_Comments	Should <u>only</u> be used if 'other' category was selected in previous column.
J	Financial_Instrument	<p>Choose one of the following categories:</p> <ul style="list-style-type: none"> <li>- Shares/stock/equities</li> <li>- Bonds/debentures/loan stock/debt securities</li> <li>- Structured securities (including securities with capital protection and structured funds)</li> <li>- Money-market securities</li> <li>- Mutual funds/UCITS (excluding structured funds)</li> <li>- Options, futures, swaps, warrants, forward rate agreements and any other derivatives</li> <li>- Financial contracts for differences</li> <li>- Other investment products/funds (please specify in comments section below)</li> </ul> <p><b>The 'other' option should only be used after ensuring that the Financial Instrument does not fall under any of the above categories. If this option is used then a short and detailed description is expected in the 'Financial Instruments Comments'.</b></p>
K	Financial_Instruments_Comments	Should <u>only</u> be used if 'other' category was selected in previous column.
L	Disputed_Amount	Amount in Euros (no decimals)
M	Settlement_Amount	Amount in Euros (no decimals)
N	Settlement_Date	Format in accordance with ISO standard 8601 (yyyy-mm-dd).
O	Record_Type	<p>Select N – For the submission of a new complaint.</p> <p>Select U – For the submission of an updated complaint which was submitted in previous period.</p>

- A CIF that did not receive any complaint within the reporting month, shall select “No” in the relevant field and shall submit the Form without completing any further information.
- The field requiring the number of clients at the end of the reporting period, concerns the clients who during the last six months have entered into at least one transaction.

- In the event where the CIF has resolved and/or revised a complaint which was referred to CySEC in a previous submission of the above mentioned 'Form', the CIF must complete all the fields of the 'Form' and select the 'U' from the column Record Type.

## **2. Naming, signing and submitting the complaints file**

### **Naming**

The CIF should rename their Annex 1 Excel file in accordance to the following naming convention:

#### **XX\_yyyymmdd\_COMP-CIF**

- (1) XX – This denotes the two letter codification which CIF has already used when submitting files to the TRS. This codification should be entered in capital letters.
- (2) yyyymmdd – This must be the last date of the month for the reporting period (i.e 20190930, 20191231).
- (3) COMP-CIF – This is the coding of the form (Complaints for CIFs) it remains unchanged and should be inserted exactly as it appears.
- (4) The Excel® must be of 2007 version and onwards. Excel will add the extension .xlsx as soon as it is saved. This extension should not under any circumstances be inserted manually.
- (5) The above naming convention must not contain any spaces.

### **Acquiring the Digital Certificate**

In cases of Regulated Entities that do not possess an approved Adacom Digital Certificate, the Entities need to liaise with the Cyprus Stock Exchange, which is the Local Registration Authority (LRA) for acquiring an Adacom Certificate in Cyprus, at 22 712 300 as described in CySEC's relevant [Announcement](#).

It is noted that the Digital Certificate expires every year and as a result the Regulated Entities need to ensure that they renew it on time and at least seven working days prior to the expiration date.

### **Digitally Signing**

After the naming convention, the Regulated Entities can use the CySEC approved Adacom Digital Certificate to sign the Form. The Commission has prepared a specialized program (CySEC Digital Signer) to facilitate the Regulated Entities to sign their Forms. It is available at the Commission's dedicated website [section](#).

## **Submitting**

After digitally signing the Forms, the Excel files should be submitted to the Commission via the TRS system. The technical information, to login to the TRS is the following:

- i. Address:  
Server IP address: 212.31.100.75  
Server Type: SFTP using SSH2
- ii. Program to be used:  
Any file transfer program (SFTP – SSH2) can be used, such as FileZilla, which is a free program and is available at <http://filezilla.sourceforge.net/>
- iii. Login/Password:  
The login and password are already given to CIFs. In the case of a new entity, the credentials can be requested via email to [information.technology@cysec.gov.cy](mailto:information.technology@cysec.gov.cy). The email subject must include the following: “TRS Credentials – {*name of the Regulated Entity*}. Furthermore, the email must cc all the CIFs Directors.
- iv. TRS directories:  
At user home directory, there are two directories:
  - Incoming – the Digitally Signed Form must be uploaded in this specific folder.
  - Outgoing – the feedback file of the Form can be downloaded from this specific folder.Special emphasis is given to the fact that the root directory should not be used to upload any files.
- v. After login into the TRS system and submitting the digitally signed Form, the Regulated Entities will receive, via TRS, the feedback file of the Forms [located in the outgoing folder], which will have an ‘OK’ indication and will be the only evidence that the Form was submitted successfully. The procedure is automated and as a result, the Entities are asked to frequently check their Outgoing directory for the feedback file. Depending on the number of processing files, this might take up to 1-2 business days.
- vi. In cases where the submission of the Form is not successful, meaning that error(s) are identified by the TRS during data processing of the Form, the Regulated Entities will receive the feedback file of the Form, via TRS, [located in the outgoing folder] which will describe the error(s).

In these instances, the Regulated Entities are required to immediately correct the error(s) and re-submit the Form using the procedure described above. During this period and until the successful submission of the Form, the Commission will not consider the Form as submitted.

- vii. The CySEC IT will provide a general support only via email communication at [information.technology@cyse.gov.cy](mailto:information.technology@cyse.gov.cy). The Entities are asked to send the technical queries attaching print screens clearly showing the error. In any case, it is **strongly advisable that the Entities seek the assistance of their local IT Personnel**.