

# **CYPRUS SECURITIES AND EXCHANGE COMMISION**

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

User Manual for access to CyTBOR by the Authorities, as defined in Article 61C (12) (a) 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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# Document Change History:

Version	Published Date	Description	
1.0	05/04/2022	Document Creation	
2.0	10/03/2023	Document Review	

# 1. Introduction

This document presents the functions of the System to the end user who has access to CyTBOR in accordance with article 61C (12) (a) 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

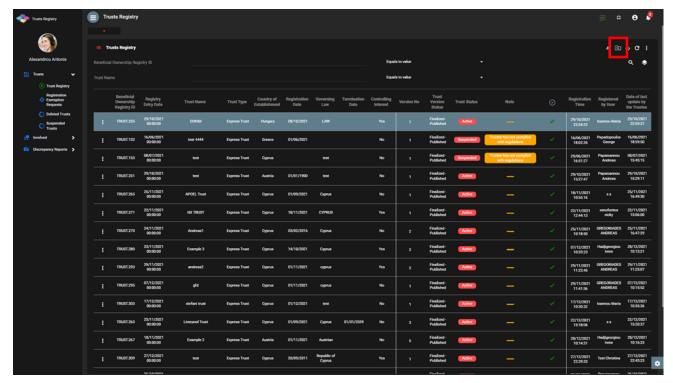
From each list of entries<sup>1</sup> the functions presented in the table below are provided. It is noted that the activation of these functions is dynamic, ie whether they will be provided in a specific list (as well as how they are provided) is determined by the App Designer, through the design tools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

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.		
Pagination  By selecting the button from the list header, the system displays the paging options. The user can choose to go to the next or previous p last or the first, as well as to change the number of entries that will on each page.				
Cleaning Filters	Φ	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 system displays the recordings again.		Selecting the button from the list header repeats the record search, and the system displays the recordings again.		
column		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.		
a nun		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)		
Classification menu right at the top of the list. The system displays in fields with which sorting can be applied. The user determ		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.		

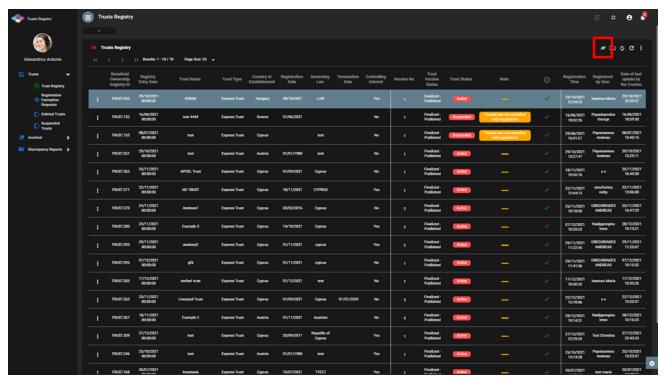
Below are indicative screens of the system for the above functions with a red indicator for each function.

<sup>&</sup>lt;sup>1</sup>In case these functions have been activated

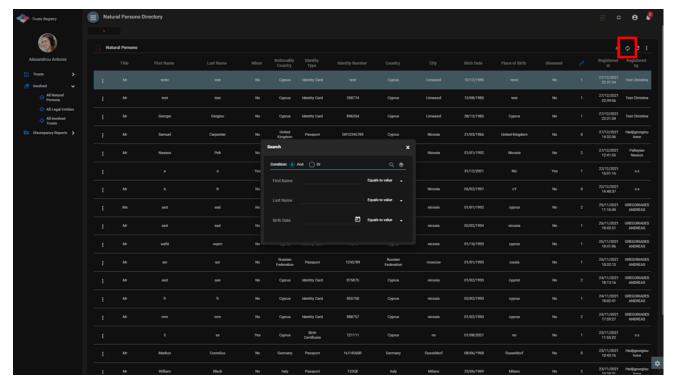
<sup>&</sup>lt;sup>2</sup>For this reason they may not all be visible in all the application lists of this project



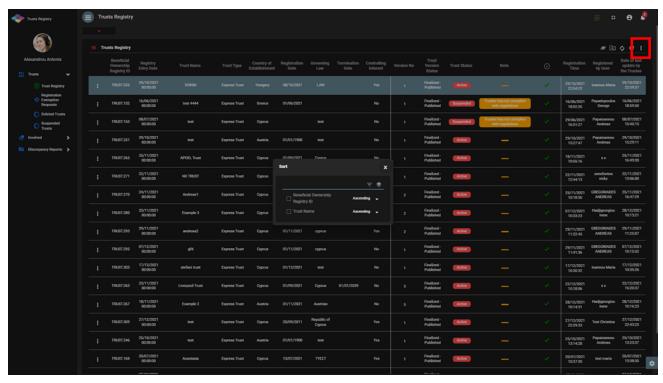
Quick Search Mode



Pagination Mode



Advanced Search Filters Defining Function



Advanced Sorting Field Defining Function

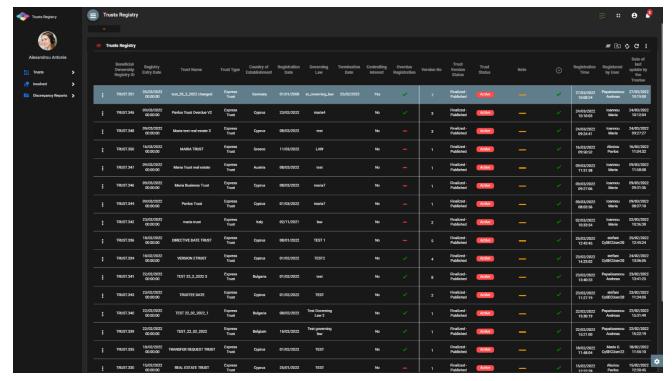
# 3. Access in accordance with section 61C (12) (a) of the AML / CFT Law

#### **3.1.** Menus

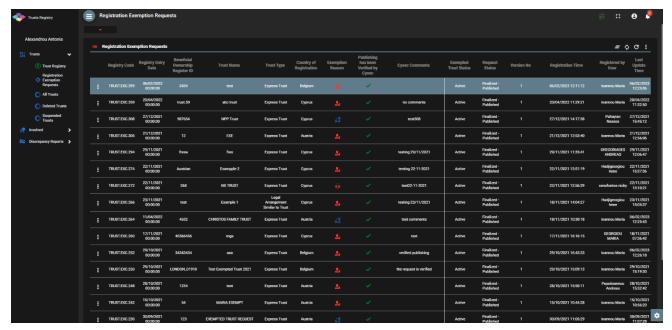
Upon entering the application, the user has access to the following data directories (menu on the left):

Menu	Description		
Trusts Registry	The specific listpresents the latest versionsof the active Trusts of the Register and which have been published. This list is essentially about the Register of Trusts.		
Registration Exemption Requests	The specific listpresents all the Requests for Exemption of Trust from the Register that have been confirmed by the Cyprus Securities and Exchange Commission (CCP).		
Deleted Trusts	The specific listpresents the Trusts that have been deleted from the Register		
Suspended Trusts	The specific listpresents the Trusts that have been suspended		
All Natural Persons	The specific listpresents the Natural Persons who have been registered in the Register, as Real Beneficiaries of the Trusts of the Register, by all the Trustees		
All Legal Entities	The specific listpresents all the Legal Entities that have been registered in the Register, as Real Beneficiaries of the Trusts of the Register, by all the Trustees		
All Secondary Trusts	The specific listpresents the Trusts registered in the database, as Real Beneficiaries of the Trusts of the Register, by all the Trustees		
My Discrepancy Reports	The specific listpresents the Differentiation Reports submitted by a user.		

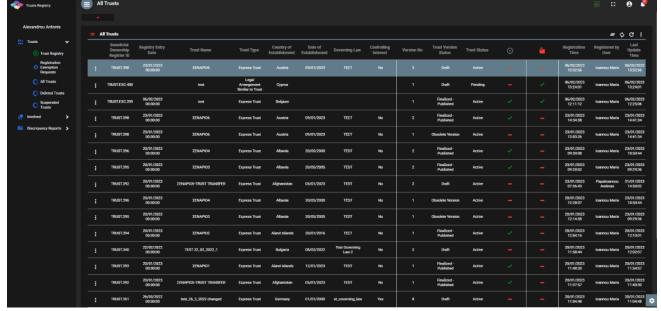
The following are indicative screens of the application directories:



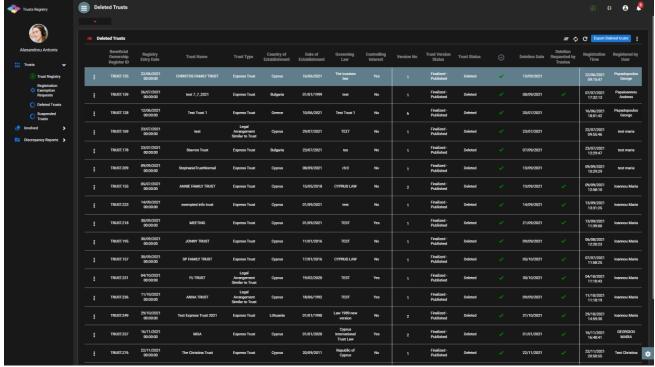
Trust Registry



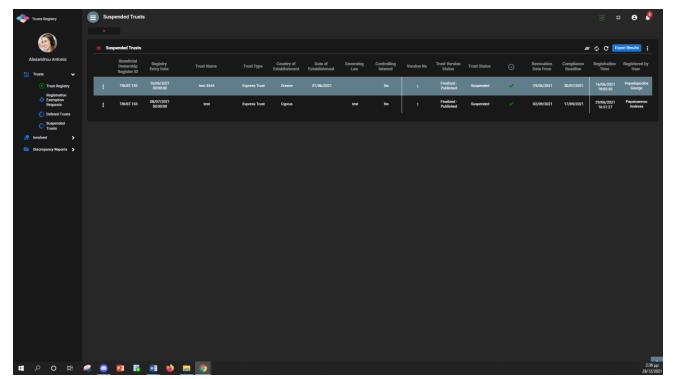
List of Trust Exemption Requests from the Registry (Registration Exemption Requests)



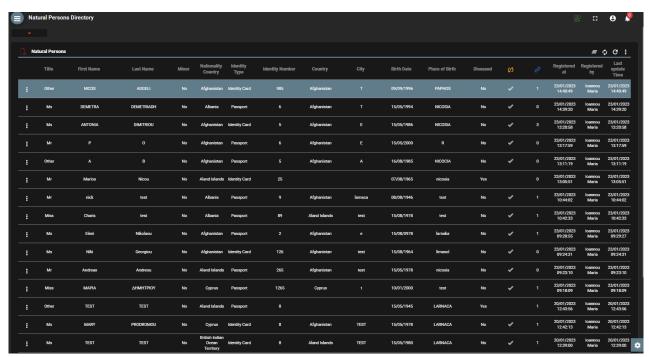
List of All Trusts (All Trusts)



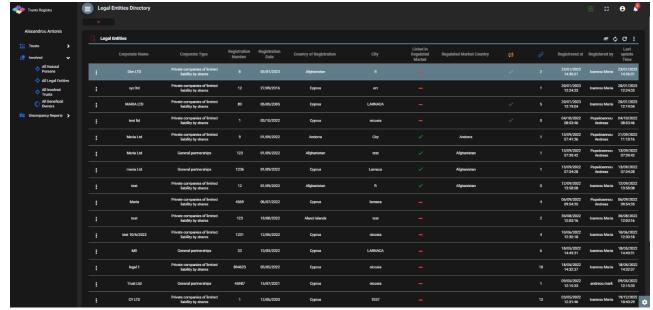
List of Deleted Trusts (Deleted Trusts)



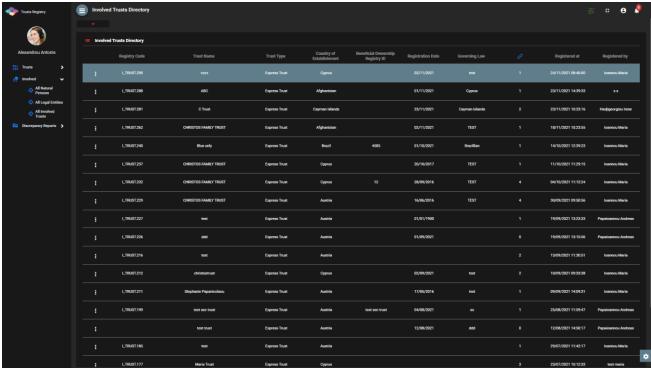
List of Suspended Trusts (Suspended Trusts)



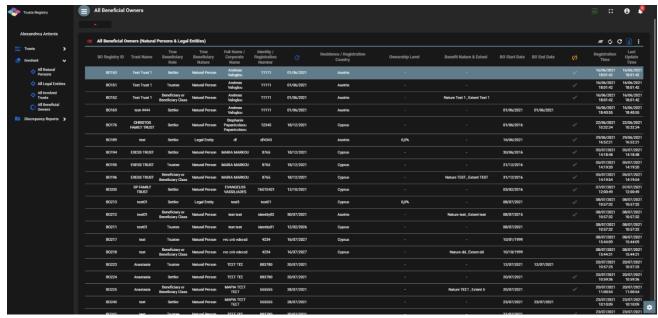
List of Natural Persons (All Natural Persons)



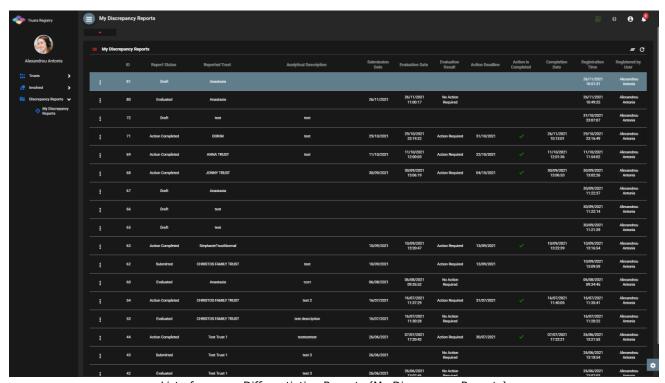
List of Legal Entities (All Legal Entities)



List of Secondary Trusts (All Involved Trusts)



List of Beneficial Owners (All Beneficial Owners)



List of my own Differentiation Reports (My Discrepancy Reports)

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

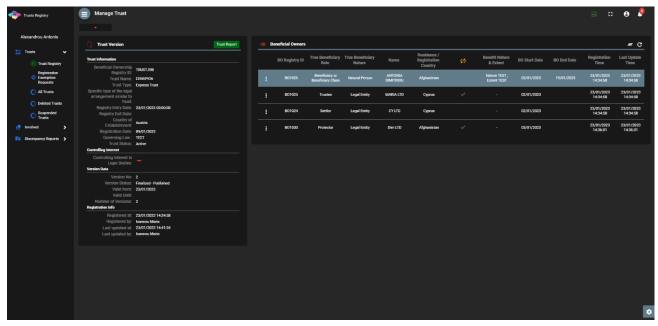
Menu	Mode	Position	Reference
Trusts Registry	View Trust (Confidence Data Overview)	Recordset	Chapter 3.2.1

	File a Poport	Recordset	Chapter 3.7.1
	File a Report (Submission of Differentiation Report)	Recordset	Cilapter 5.7.1
		December 1	Cl., 1, 2, 2, 4
Registration Exemption	View Exempted Trust	Recordset	Chapter 3.3.1
Requests	(Trust Exemption Application Management		
	from the Registrywithout edit / create capabilities.)		
All Trusts	View Trust	Recordset	Chapter 3.2.1
	(Trust Overview)		Chapter 3.2.1
	(Trust Overview)		
Deleted	View Trust	Recordset	Chapter 3.2.1
Trusts	(Trust Overview)		
Suspended	View Trust	Recordset	Chapter 3.2.1
Trusts	(Trust Overview)		
All Natural	View Natural Person	Recordset	Chapter 3.4.1
Persons	(Registration of a Natural Personin view mode)		
	Beneficial Ownerships	Recordset	Chapter 3.4.2
	(Engagement in Registry Trusts)		
	Ownership & Control in Legal Entities	Recordset	Chapter 3.4.3
	(Participation in Legal Entities)		, i
All Local		Recordset	Chanton 2 F 1
All Legal Entities	ViewLegal Entity  (Registration of a Logal Entity view mode)	Recordset	Chapter 3.5.1
	(Registration of a Legal Entityin view mode)		
	Beneficial Ownerships	Recordset	Chapter 3.5.2
	(Involvement in Registry Trusts)		
	Beneficial Owners / Managing Officials	Recordset	Chapter 3.5.3
	(Beneficiaries / Directors Overview)		
All Involved	Beneficial Ownerships	Recordset	Chapter 3.6.1
Trusts	(Involvement in Registry Trusts)		·
All Beneficial	Print Beneficial Owners	Header (icon)	
Owners			
Му	Edit Report.	Recordset	Chapter 3.7.1
Discrepancy	Report Reference		
Reports	Discrepancy edit mode)		
	This feature is only allowed if the report is in		
	Draft mode.		
	Submit Report	Recordset	Chapter 3.7.2
	(Submission of Discrepancy Report)		
	This feature is only allowed if the report is in Draft mode.		
	Cancel Report	Recordset	Chapter 3.7.3
	(Cancellation of Discrepancy Report)		
	This feature is only allowed if the report is in Draft mode		

# 3.2. Registry Trust Management

#### 3.2.1. View Trust

The purpose of this function is to present to the user the detailed data concerning a Trust that has been registered in the Register.



Trust Overview Screen

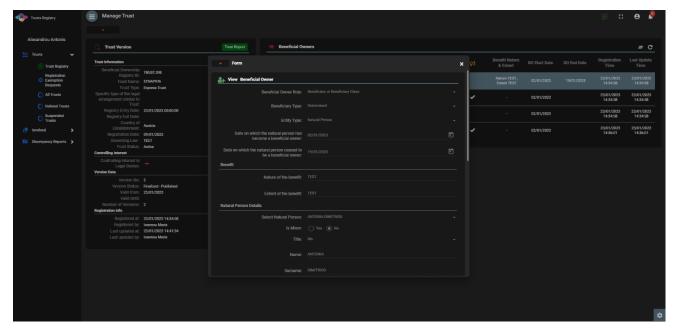
From the Trust Overview screen, the following functions are provided per presented card:

Card	Mode	Position	Reference
Trust Version	Trust Report	Header (icon)	
Beneficial Owners	View Beneficial Owner Details (Beneficial Owner Data Overview)	Recordset	Chapter 3.2.2
	View Trust (Trust Management who has been declared as a Beneficial Owner of the Register Trust)  Allowed only if the Beneficial Owner is a Trust	Recordset	-Chapter 3.2.3
	View Beneficial Owners / Managing Officials (Overview of Real Beneficiaries / Legal Directors) Be allowed only if the Beneficial Owner is a Legal Entity	Recordset	Chapter 3.5.3

Functions Provided in the Trust Overview Screen

#### 3.2.2. View Beneficial Owner Details

The purpose of this function is to present to the user the details of a Beneficial Owner of a Trust.



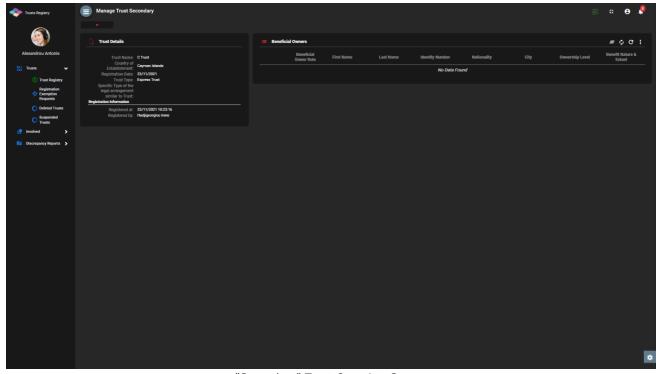
Beneficial Owner Data Overview Screen

# 3.2.3. Overview of Trust Declared as a Beneficial Owner (View Trust)

The purpose of this function is to present to the user the detailed data concerning a Trust that has been registered as a beneficial owner.

(!)

This feature is only available if the benficila owner has declared that it is a Trust.



"Secondary" Trust Overview Screen

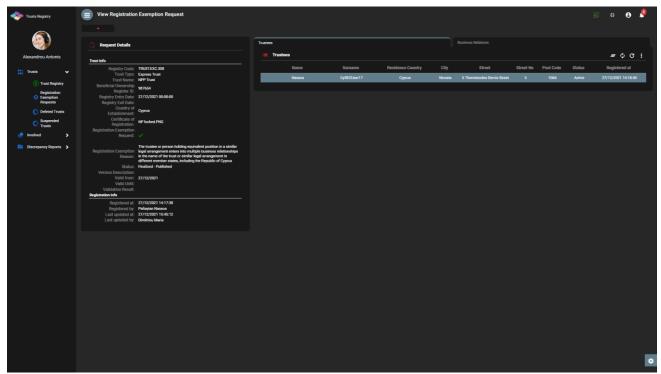
The following functions are provided per displayed card from the "Secondary" Trust Overview screen:

Card	Mode	Position	Reference
Trust Details	No Action		
Beneficial Owners	View Beneficial Owner Details (Registration of a Beneficial Owner for a Trust who is the Beneficial Owner of a Trust in the Register in view mode)	Recordset	Chapter 3.2.2

# 3.3. Trust Management with a request for exemption from the Register

#### 3.3.1. View Exempted Trust

The purpose of this function is to present to the user the detailed data of a Request for Exemption of Trust from the Register.

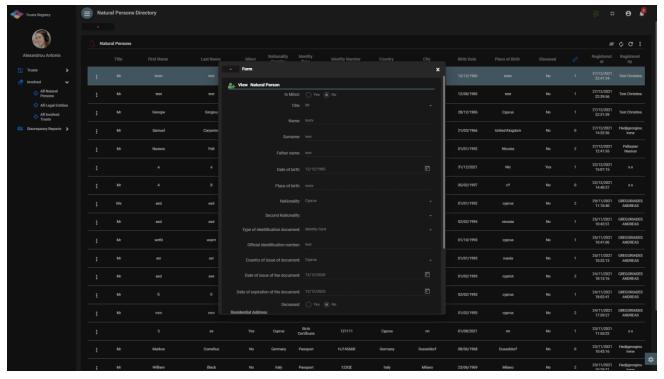


Trust Overview Screen with Exemption Registration Request

#### 3.4. Natural Person Management

#### 3.4.1. View Natural Person

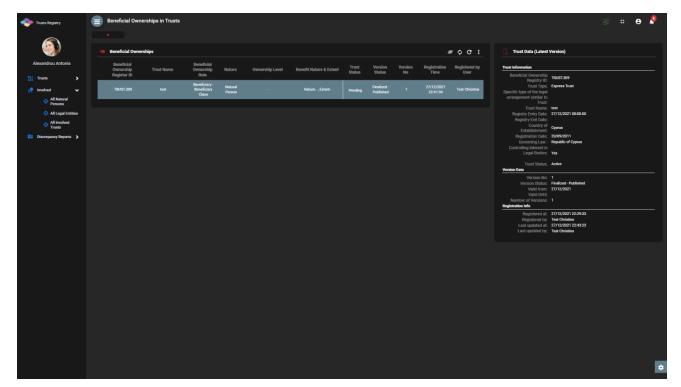
The purpose of this function is to present the detailed data of a Natural Person.



Individual Data Overview Screen

#### 3.4.2. Involvement in Registered Trusts (Beneficial Ownerships)

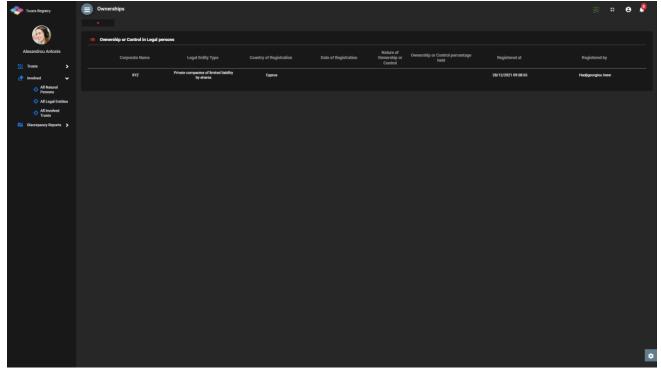
The purpose of the Liturgy is to present the Trusts of the Register in which the Natural Person has been registered as a Beneficial owner.



Screen of Individual Involvement in Registry Trusts

# 3.4.3. Participation in Legal Entities (Ownership & Control in Legal Entities)

The purpose of the Liturgy is to present the Legal Entities in which the selected Natural Person has been declared as the Beneficial Owner/ Director.

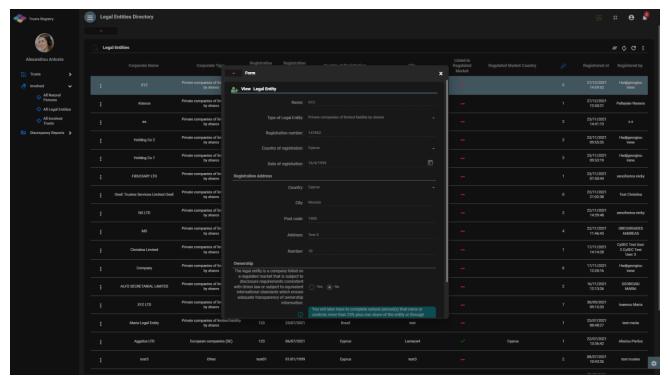


Screen of Natural Person Involvement in Legal Entities

# 3.5. Legal Entity Management

#### 3.5.1. View Legal Entity

The purpose of this function is to present the detailed data of a Legal Entity.



Legal Entity Overview Screen

#### 3.5.2. Involvement in Registry Trusts (Beneficial Ownerships)

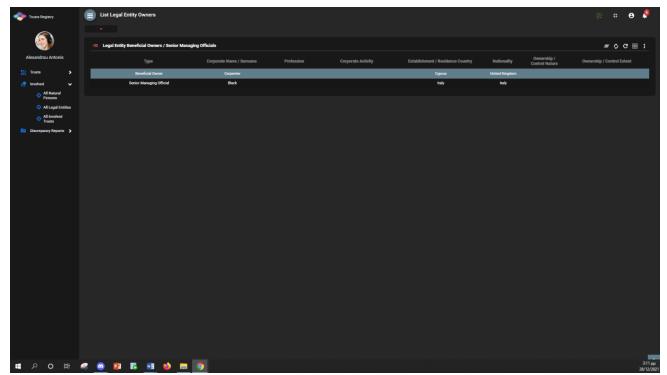
This function is similar to that in Chapter 6.4.1 except that it is a Legal Entity.

#### 3.5.3. Overview of Beneficial Owners / Managing Officials

The purpose of this function is to present to the user the detailed data of the Real Beneficiaries / Directors of a Legal Entity that has been registered as a Beneficial Owner of the Register.



This feature is only available if the Beneficial Owner has been declared a Legal Entity.



Screen of Real Beneficiaries / Legal Entities Directors

# 3.6. Secondary Trust Management

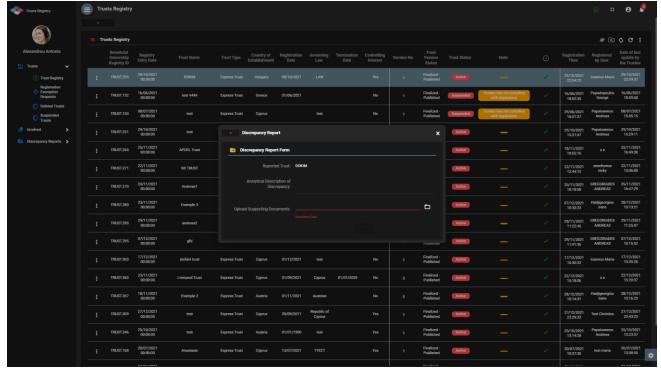
#### 3.6.1. Involvement in Registry Trusts (Beneficial Ownerships)

This function is similar to that in Chapter 3.5.2 except that it is a (secondary) Trust.

# 3.7. Discrepancy Report Management

#### 3.7.1. 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 differentiation
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 Differentiation Report (edit form) from the My Discrepancy Reports directory.

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

#### 3.7.2. 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.

# 3.7.3. Cancel Report Cancel Report

The purpose of this function is to cancel (physically delete) a Differentiation 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 Differentiation Report is in Draft mode.