



CYPRUS SECURITIES AND EXCHANGE COMMISSION

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

User Manual for access to CyTBOR by Credit and Financial Institutions

Date: 05.04.2022

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

CONTENTS

1.	Introduction	4
2.	Horizontal Functions.....	5
2.1.	Common Functions in Lists	5
2.2.	User Registration & Subscription Management functions.....	8
2.2.1.	User Registration (Sign Up).....	8
2.2.2.	Subscription Payment.....	14
2.2.3.	Subscription Management.....	16
3.	Access by credit institutions and financial institutions only, in accordance with section 61C (12) (b) of the AML / CFT Law.....	19
3.1.	Menus.....	19
3.2.	Registry Trust Management	23
3.2.1.	View Trust	23
3.3.	Discrepancy Report Management.....	24
3.3.1.	File a Report	24
3.3.2.	Submit Report.....	25
3.3.3.	Cancel Report	25
3.4.	Access Request Management	25
3.4.1.	Submit Request Access by Trustee	25
3.4.2.	Submit Request for Access (Submit)	27
3.4.3.	Delete Request for Access (Delete)	27

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 as a 'Credit and Financial Institution' in accordance with Article 61C (12) (b) of the Prevention and Suppression of Money Laundering and Terrorist Financing Law of 2007 (188 (I) / 2007) (the 'AML/CFT Law'), as amended.

2. Horizontal Functions

2.1. Common Functions in Lists

From each list of entries¹ 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 platform².

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 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.

¹In case these functions have been activated

²For this reason they may not all be visible in all the application lists of this project

Trusts Registry

Beneficial Ownership Registry ID

Trust Name

Beneficial Ownership Registry ID	Registry Entry Date	Trust Name	Trust Type	Country of Establishment	Registration Date	Governing Law	Termination Date	Controlling Interest	Version No	Trust Version Status	Trust Status	Note	Registration Time	Registered By User	Date of last update by the Trustee
TRUST 255	25/10/2021 00:00:00	DOKM	Express Trust	Hungary	08/10/2021	LAW		Yes	1	Finalized - Published	Active		25/10/2021 22:54:23	Ioannou Maria	25/10/2021 22:59:37
TRUST 132	14/06/2021 00:00:00	test 4444	Express Trust	Greece	01/04/2021			No	1	Finalized - Published	Suspended	Trustee has not complied with regulations	14/06/2021 18:02:35	Papadopoulos George	14/06/2021 18:59:50
TRUST 153	08/07/2021 00:00:00	test	Express Trust	Cyprus		test		No	1	Finalized - Published	Suspended	Trustee has not complied with regulations	25/06/2021 14:51:27	Papaioannou Andreas	08/07/2021 15:45:15
TRUST 251	25/10/2021 00:00:00	test	Express Trust	Austria	01/01/1900	test		No	1	Finalized - Published	Active		25/10/2021 15:27:47	Papaioannou Andreas	25/10/2021 15:29:11
TRUST 265	25/11/2021 00:00:00	APOEL Trust	Express Trust	Cyprus	01/09/2021	Cyprus		No	1	Finalized - Published	Active		18/11/2021 10:55:16	**	25/11/2021 16:49:30
TRUST 271	22/11/2021 00:00:00	NX TRUST	Express Trust	Cyprus	18/11/2021	CYPRUS		Yes	1	Finalized - Published	Active		22/11/2021 12:44:13	simofonta nicky	22/11/2021 13:06:00
TRUST 270	24/11/2021 00:00:00	Andreas1	Express Trust	Cyprus	03/02/2016	Cyprus		No	2	Finalized - Published	Active		25/11/2021 10:18:50	GREGORADES ANDREAS	25/11/2021 16:47:29
TRUST 280	23/11/2021 00:00:00	Example 3	Express Trust	Cyprus	14/10/2021	Cyprus		Yes	2	Finalized - Published	Active		07/12/2021 10:33:23	Hadjigeorgiou Irene	28/12/2021 10:13:21
TRUST 293	29/11/2021 00:00:00	andreas2	Express Trust	Cyprus	01/11/2021	cyprus		Yes	2	Finalized - Published	Active		29/11/2021 11:22:45	GREGORADES ANDREAS	29/11/2021 11:25:07
TRUST 295	07/12/2021 00:00:00	gfd	Express Trust	Cyprus	01/11/2021	cyprus		No	1	Finalized - Published	Active		29/11/2021 11:41:36	GREGORADES ANDREAS	07/12/2021 10:15:52
TRUST 303	17/12/2021 00:00:00	stefani trust	Express Trust	Cyprus	01/12/2021	test		No	1	Finalized - Published	Active		17/12/2021 10:30:52	Ioannou Maria	17/12/2021 10:35:26
TRUST 263	23/11/2021 00:00:00	Liverpool Trust	Express Trust	Cyprus	01/09/2021	Cyprus	01/01/2039	No	3	Finalized - Published	Active		22/12/2021 15:18:06	**	22/12/2021 15:20:37
TRUST 267	18/11/2021 00:00:00	Example 2	Express Trust	Austria	01/11/2021	Austrian		No	5	Finalized - Published	Active		28/12/2021 10:14:31	Hadjigeorgiou Irene	28/12/2021 10:16:23
TRUST 309	27/12/2021 00:00:00	test	Express Trust	Cyprus	20/09/2011	Republic of Cyprus		Yes	1	Finalized - Published	Active		27/12/2021 22:29:33	Test Christina	27/12/2021 22:43:23

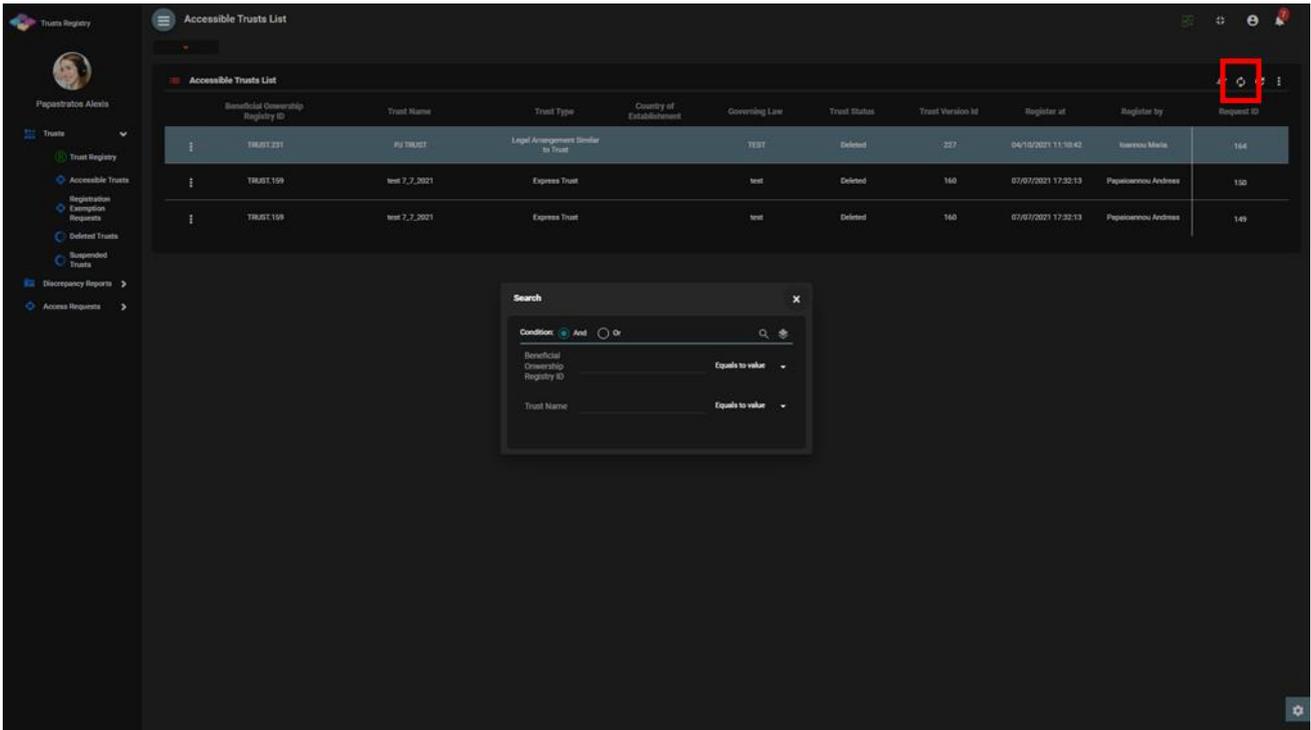
Quick Search Mode

Trusts Registry

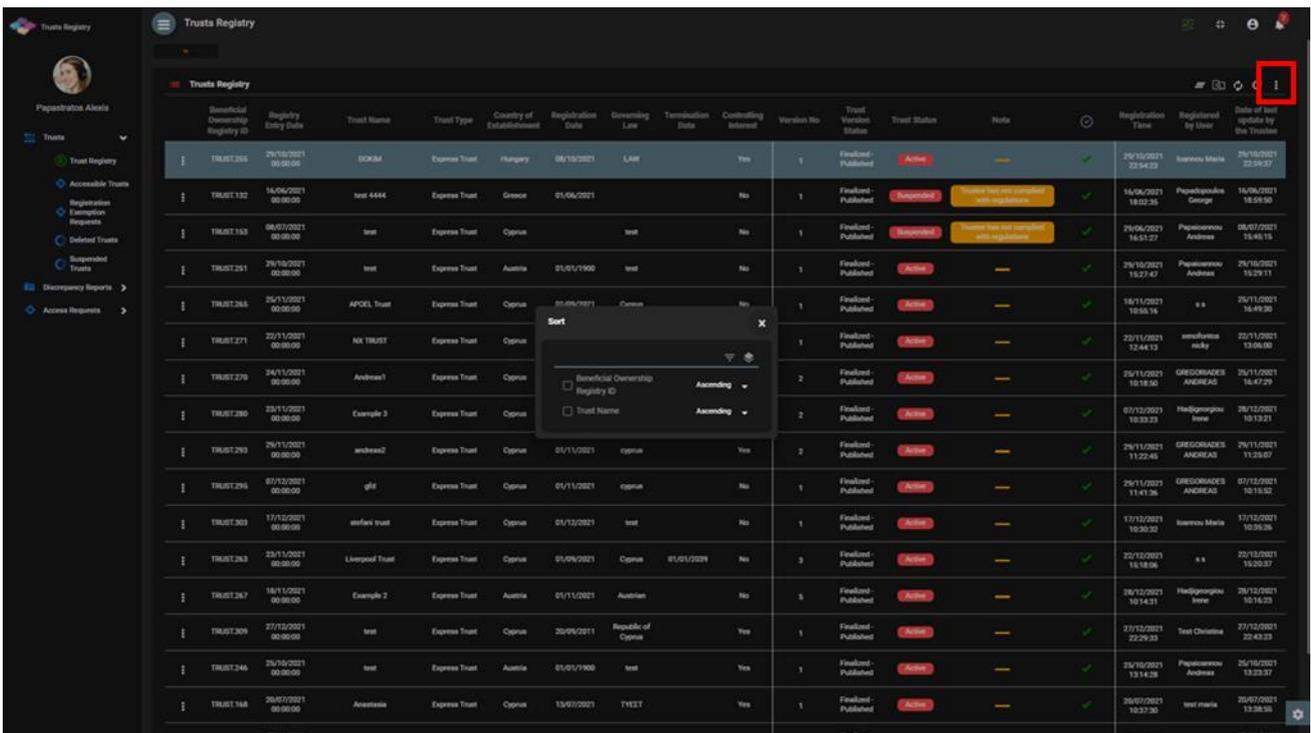
Results 1 - 18 / 18 Page Size 20

Beneficial Ownership Registry ID	Registry Entry Date	Trust Name	Trust Type	Country of Establishment	Registration Date	Governing Law	Termination Date	Controlling Interest	Version No	Trust Version Status	Trust Status	Note	Registration Time	Registered By User	Date of last update by the Trustee
TRUST 255	25/10/2021 00:00:00	DOKM	Express Trust	Hungary	08/10/2021	LAW		Yes	1	Finalized - Published	Active		25/10/2021 22:54:23	Ioannou Maria	25/10/2021 22:59:37
TRUST 132	14/06/2021 00:00:00	test 4444	Express Trust	Greece	01/04/2021			No	1	Finalized - Published	Suspended	Trustee has not complied with regulations	14/06/2021 18:02:35	Papadopoulos George	14/06/2021 18:59:50
TRUST 153	08/07/2021 00:00:00	test	Express Trust	Cyprus		test		No	1	Finalized - Published	Suspended	Trustee has not complied with regulations	25/06/2021 14:51:27	Papaioannou Andreas	08/07/2021 15:45:15
TRUST 251	25/10/2021 00:00:00	test	Express Trust	Austria	01/01/1900	test		No	1	Finalized - Published	Active		25/10/2021 15:27:47	Papaioannou Andreas	25/10/2021 15:29:11
TRUST 265	25/11/2021 00:00:00	APOEL Trust	Express Trust	Cyprus	01/09/2021	Cyprus		No	1	Finalized - Published	Active		18/11/2021 10:55:16	**	25/11/2021 16:49:30
TRUST 271	22/11/2021 00:00:00	NX TRUST	Express Trust	Cyprus	18/11/2021	CYPRUS		Yes	1	Finalized - Published	Active		22/11/2021 12:44:13	simofonta nicky	22/11/2021 13:06:00
TRUST 270	24/11/2021 00:00:00	Andreas1	Express Trust	Cyprus	03/02/2016	Cyprus		No	2	Finalized - Published	Active		25/11/2021 10:18:50	GREGORADES ANDREAS	25/11/2021 16:47:29
TRUST 280	23/11/2021 00:00:00	Example 3	Express Trust	Cyprus	14/10/2021	Cyprus		Yes	2	Finalized - Published	Active		07/12/2021 10:33:23	Hadjigeorgiou Irene	28/12/2021 10:13:21
TRUST 293	29/11/2021 00:00:00	andreas2	Express Trust	Cyprus	01/11/2021	cyprus		Yes	2	Finalized - Published	Active		29/11/2021 11:22:45	GREGORADES ANDREAS	29/11/2021 11:25:07
TRUST 295	07/12/2021 00:00:00	gfd	Express Trust	Cyprus	01/11/2021	cyprus		No	1	Finalized - Published	Active		29/11/2021 11:41:36	GREGORADES ANDREAS	07/12/2021 10:15:52
TRUST 303	17/12/2021 00:00:00	stefani trust	Express Trust	Cyprus	01/12/2021	test		No	1	Finalized - Published	Active		17/12/2021 10:30:52	Ioannou Maria	17/12/2021 10:35:26
TRUST 263	23/11/2021 00:00:00	Liverpool Trust	Express Trust	Cyprus	01/09/2021	Cyprus	01/01/2039	No	3	Finalized - Published	Active		22/12/2021 15:18:06	**	22/12/2021 15:20:37
TRUST 267	18/11/2021 00:00:00	Example 2	Express Trust	Austria	01/11/2021	Austrian		No	5	Finalized - Published	Active		28/12/2021 10:14:31	Hadjigeorgiou Irene	28/12/2021 10:16:23
TRUST 309	27/12/2021 00:00:00	test	Express Trust	Cyprus	20/09/2011	Republic of Cyprus		Yes	1	Finalized - Published	Active		27/12/2021 22:29:33	Test Christina	27/12/2021 22:43:23
TRUST 246	25/10/2021 00:00:00	test	Express Trust	Austria	01/01/1900	test		Yes	1	Finalized - Published	Active		25/10/2021 13:14:28	Papaioannou Andreas	25/10/2021 13:23:37
TRUST 148	20/07/2021 00:00:00	Anastasia	Express Trust	Cyprus	13/07/2021	TYEST		Yes	1	Finalized - Published	Active		20/07/2021 10:14:31	test maria	20/07/2021 10:16:23

Pagination Mode



Advanced Search Filters Defining Function

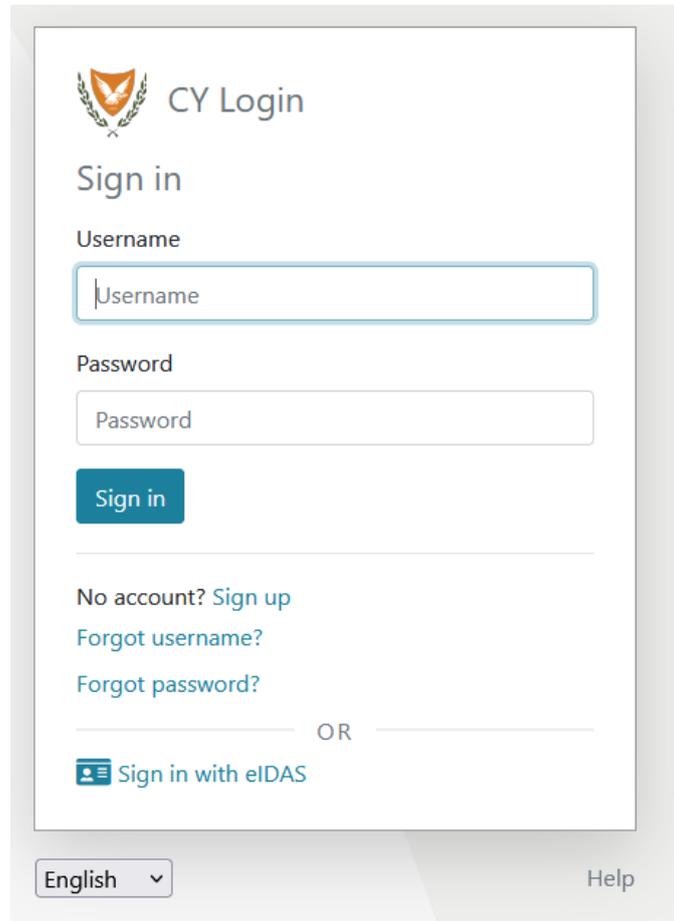


Advanced Sorting Field Defining Function

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

Sign in

Username

Username

Password

Password

Sign in

No account? [Sign up](#)

[Forgot username?](#)

[Forgot password?](#)

OR

 [Sign in with eIDAS](#)

English

Help

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 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)

The screenshot shows a user registration form for the Cyprus Securities & Exchange Commission. The form is set against a dark background with a faint image of a building. The logo of the Cyprus Securities & Exchange Commission is at the top. The form fields are as follows:

- Organization:** Cyprus Securities & Exchange Commission
- Identity Provider:** CY Login
- Actor:** A dropdown menu is open, showing the following options:
 - Trustee of an express trust or person holding an equivalent position in a legal arrangement similar to trust
 - Credit or Financial Institution as Obligated Entity according to the AML/CFT Law [L. 188(I)/2007]
 - Competent Authorities and FIU
 - Obligated entity according to the AML/CFT Law [L. 188(I)/2007] (excluding Credit & Financial Institutions)
- Email:** (empty)
- Language:** (empty)
- Theme:** (empty)
- Username:** (empty)

At the bottom of the form, there is a "Sign Up" button and a link that says "Already have an account? Sign in here". At the very bottom, there is a footer: "Powered by Node Server 4.01 | Copyright © 2019. All Rights Reserved."

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 <i>Note: The system displays the Digital Authentication Services to which the selected Organization is registered (Platform Authentication Service or connected LDAP Directories)</i>
Actor	The role in which the user wishes to register in the system <i>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)</i>
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 preselected 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 preselected by default)

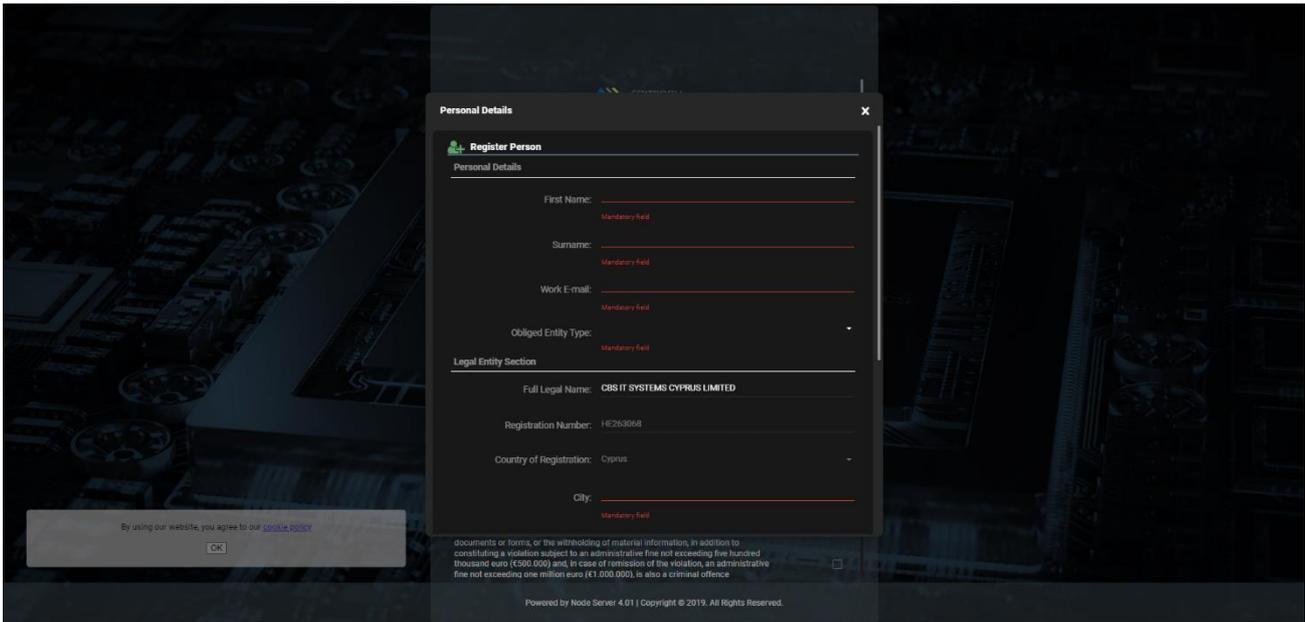
E-mail	The user's email address <i>Note: The above address should be unique to the system for the selected Organization and Digital Authentication Service.</i>
Language	The presentation language of the system screens desired by the user.
Username	The unique ID of the user from Cy Login. The field is locked and cannot be modified.
Person	The detailed 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 Obligated Entity.
C_OBLIGED_BANK	Credit or Financial Institution as an Obligated 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	Obligated Entity according to section 2A 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 Person Form (pop up)

Individual Data Entry Form

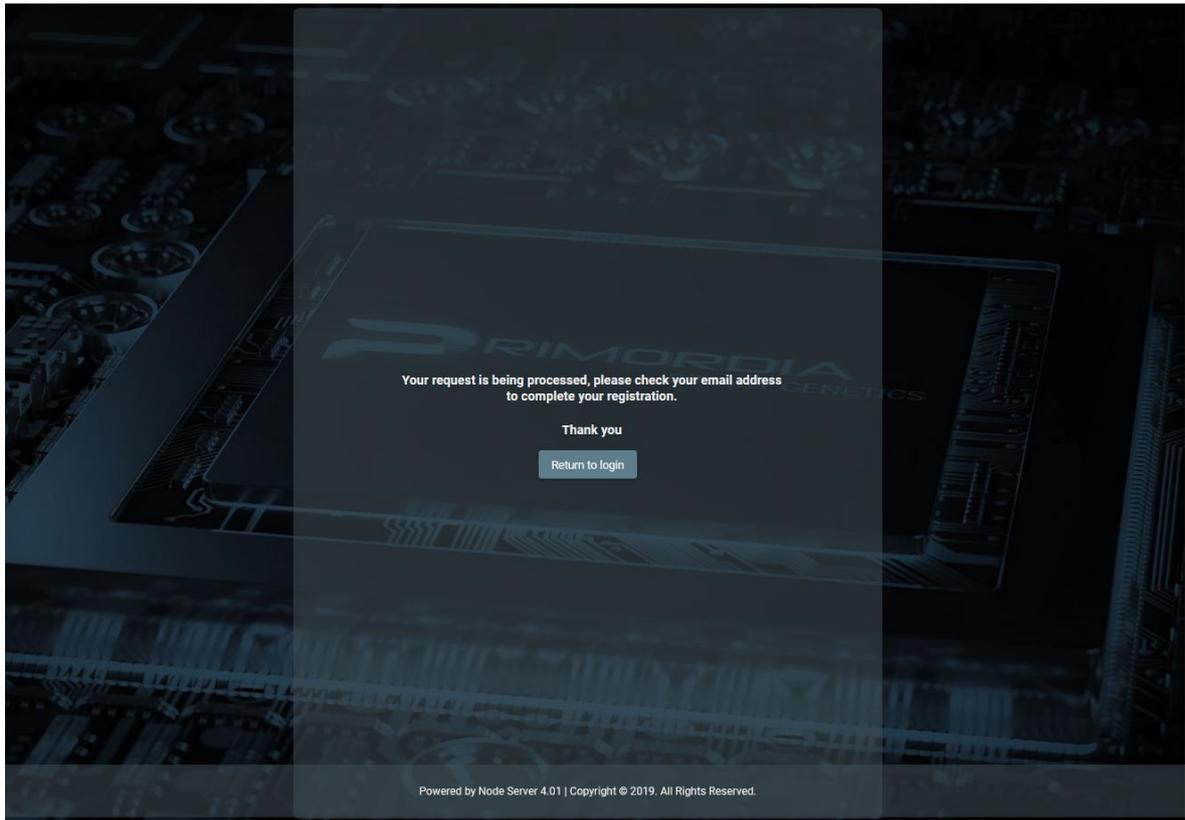


In the Natural Person registration form the user must fill in the following information:

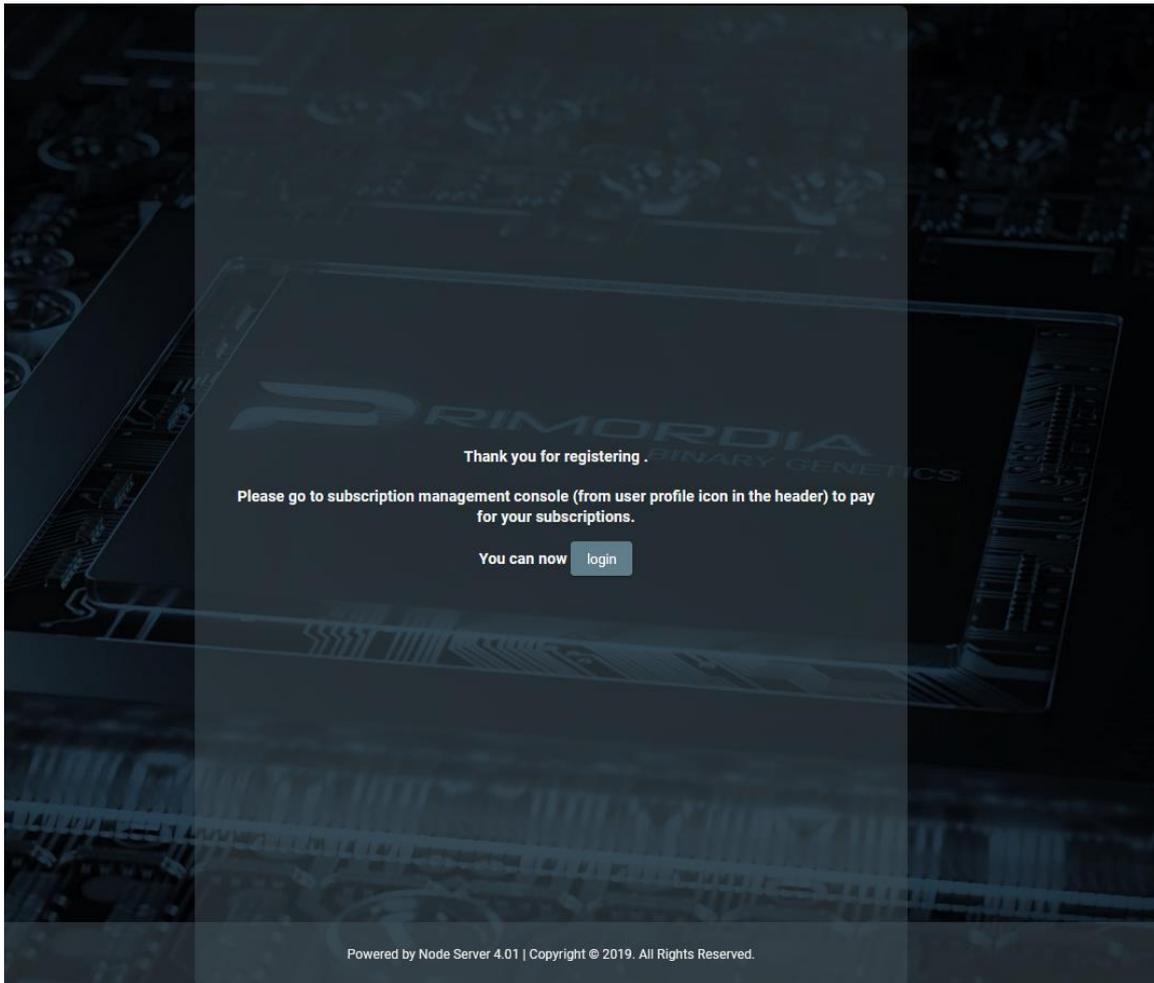
Field Name	Field Type	Shows up	Mandatory	Remarks
Person Section				
Name	Text field	YES	YES	Name
Surname	Text field	YES	YES	Last name
Work E-mail	E-mail field	YES	YES	Working E-Mail
I wish to register and act on behalf of a Legal Entity	Check box YES / NO (check box)	YES	YES	I wish to register and use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

Registration Number	Text field	YES	Under conditions	Registration number <i>The field is required if a role other than Competent Authority or Cysec is chosen</i>
Country of Registration	Menu options with database countries	YES	YES	Country of Registration <i>Depending on the role to be selected the field receives a default Cyprus value and locks</i>
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 <i>In the case of an Obligated Entity role the available options change depending on the Obligated Entity Type selected</i> <i>At the same time, the check box "Not in List" appears.</i>
Relevant AML / CFT Supervisory Authority	Text box	Under conditions	YES (if displayed)	AML / CFT Supervisory Authority <i>The field is displayed if a YES value is selected in the Not in List check box</i>
Country of AML / CFT Supervisory Authority	Menu options with database countries	Under conditions	YES (if displayed)	Country of AML / CFT Surveillance Authority <i>The field is displayed if a YES value is selected in the Not in List check box</i>
License Number by AML / CFT Supervisory Authority	Text field	Under conditions	YES (if displayed)	License Number from AML / CFT Supervisory Authority <i>The field is displayed when the section is displayed</i>

C. Registration Confirmation Screen



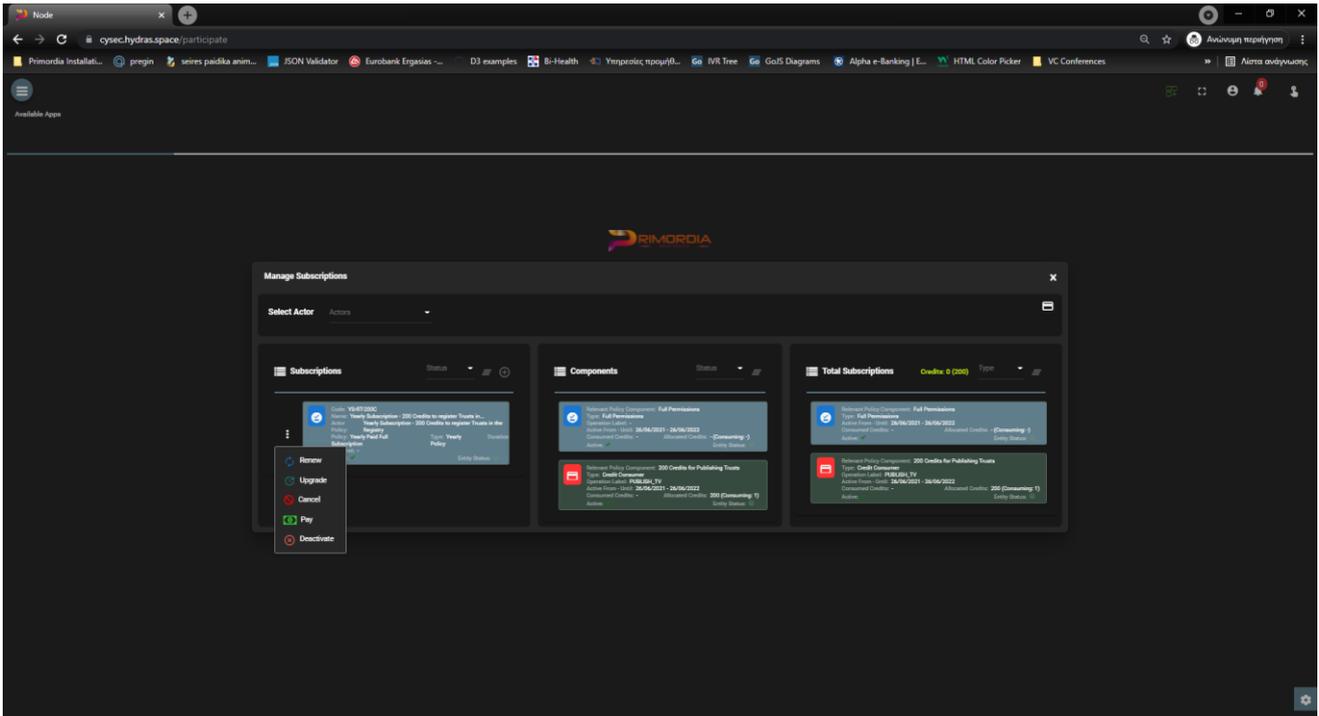
Email Message



Email Confirmation Message. Complete User Registration

2.2.2. Subscription Payment

If a subscription fee is required for the role the user has taken on, the user should select the Account function  from the header of the screen, and then the Subscriptions function from the options menu. In such a case, the system displays the list of Subscriptions available to the user, where the user can select the Pay function from the options menu at the recordset level of an unpaid payment. When the Pay function is activated, the system refers the user to the relevant page of the Payment Gateway (JCC) used, so that he can provide his credit card details and complete the payment of the subscription.



Subscription Screen - Subscription Payment Mode



If the transaction is approved, a purchase for 250.00 EUR will appear in your bank statement under the name PAPAIOANNOU ANDREAS



Card Number : 0

Expiry Date (Month / Year) : /

CW2/CSC : 

SUBMIT

[Cancel and return to Merchant's website](#)



Session Timeout
04:53

JCC Payment Form



If the selected subscription does not require payment, or has been paid or is no longer active, the system does not display the Pay function in the options menu.

After completing the subscription payment, the system registers an entry in the user's payment table and activates the system functions to which the selected role relates.

2.2.3. Subscription Management

To manage its subscriptions, the user selects the Account function  from the header of the screen, and then the Subscriptions function from the options menu. In such a case, the system displays the list of Subscriptions available to the user, for all the roles (actors) available:

- The subscriptions whose "synthetic" state is inactive are shown in gray (see below).
- For each subscription, its components are displayed (see notes), while the last card shows the total of subscription components that include all user subscriptions (as well as the total of credits and those that have been spent).
- The user can filter the data of each card based on the "synthetic" status of the subscription (and the type for the last card).
- The user can filter the card data by selecting an actor from the screen header.

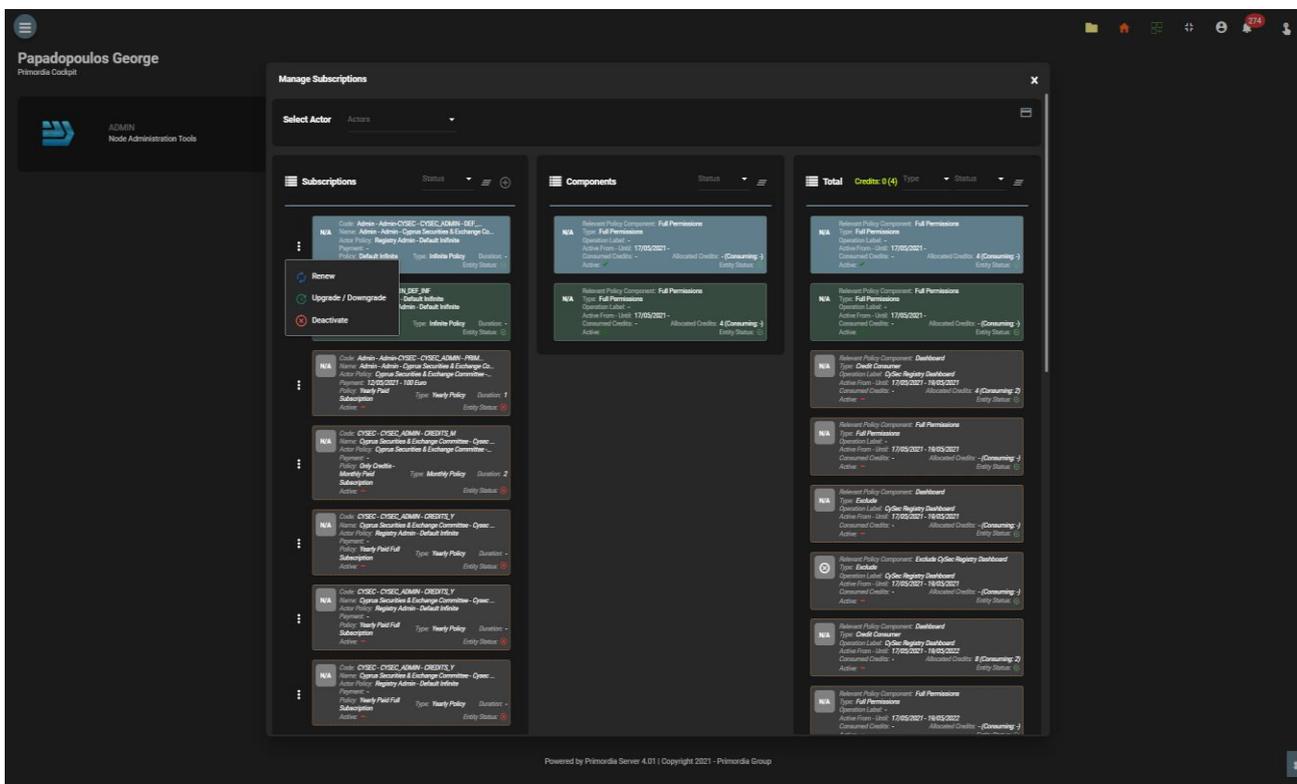
To renew a subscription, the user must select the Renew action from the options menu at the recordset level of a subscription (which is "active"). In such a case, the system displays a pop up screen which shows only the selected subscription and check box for keeping the credits locked with the value NO (YES is not provided for the ECC). The user selects values and presses proceed. If the subscription involves payment, the system refers to the JCC to complete the payment. After the payment is completed, the system creates a new "active" subscription and deactivates the previous one.

To upgrade a subscription, the user must select the Upgrade / Downgrade action from the options menu at the recordset level of a subscription (which is "active"). In such a case, the system displays a pop up screen in which the user is asked to select a new subscription (compatible with his role) as well as if he wants to keep the credits of the previous subscription (locked NO value). The user selects values and presses Proceed. If the new subscription involves payment, the system refers the user to the JCC to complete the payment. After completing the payment, the system creates a new subscription and keeps the previous one active. If he has not paid the new subscription, the user can pay for it at a later stage (in this case, the subscription appears as "inactive").

To cancel a subscription, the user must select the Cancel action from the options menu at the recordset level of a subscription (which is "inactive"). In such a case, the system permanently deletes the subscription.

To deactivate a subscription, the user must select the Deactivate action from the options menu at the recordset level of a subscription (which is marked as active (entity status)). In such a case, the system changes the marking to "inactive".

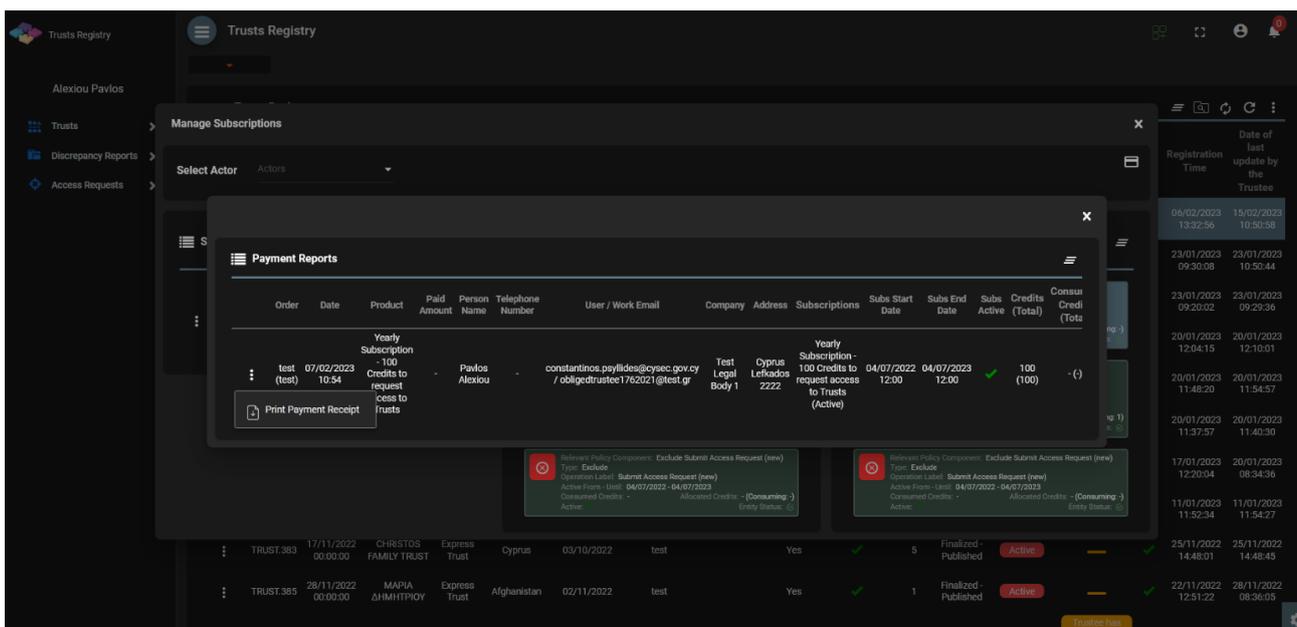
To activate a subscription, the user must select the Activate action from the options menu at the recordset level of a subscription (which is marked as "inactive" (entity status)). In such a case, the system changes the marking to "active".



User Subscription Management Screen

The user can see the completed payments with the button 'Payments'. In this report the user is able to download the payment receipt from each record.

Payment Report Screen





Subscription Components: Each subscription (at its design) may contain the following components:

- Full permissions: Means that the user can access all the functions that are defined as available for the specific role (actor)
- Credit consumer: It means that for a specific function the user must have credits to perform it
- Exclude: Means that a specific function is not provided to the user unless it has a credits consumer component for it



Preservation of credits: It is a function for the option of transferring the (remaining) credits of an existing subscription to a new one. It is not provided as a function in the case of ECC



Real Subscription Status: In order for a subscription to be active, you must:

- If it has a validity period, the current date must be within the validity period
- Must be entity_status = active (system status for all admin entities)
- If it contains a payment, it must have been repaid



A subscription that is about to expire (within 10 days) flashes on the screen.

3. Access by credit institutions and financial institutions only, 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 the latest releases of the active Trusts of the Registry and which have been published, for the Trusts which have been accessed to the user through the approval of an access request.
Registration Exemption Requests	This list presents all Applications for Exemption of Confidence from the Register that have been confirmed by the Hellenic Capital Market Commission
Deleted Trusts	This list presents the Trusts that have been deleted from the Register.
Suspended Trusts	This list presents Suspended trusts
My Discrepancy Reports	This list presents the Discrepancy Reports submitted by a user.
My Access Requests	This list presents the Request for Access to Trusts that have been registered by a user.

The following are indicative screens of the application directories:

The screenshot displays the 'Trusts Registry' interface. On the left, there is a navigation menu with options: Trusts Registry, Accessible Trusts, Registration Exemption Requests, Deleted Trusts, Suspended Trusts, Discrepancy Reports, and Access Requests. The main area shows a table of trust records with the following columns: Beneficial Ownership Registry ID, Registry Entry Date, Trust Name, Trust Type, Country of Establishment, Registration Date, Governing Law, Termination Date, Controlling Interest, Override Registration, Version No, Trust Version Status, Trust Status, Note, Registration Time, Registered by User, and Date of last update by the Trustee.

Beneficial Ownership Registry ID	Registry Entry Date	Trust Name	Trust Type	Country of Establishment	Registration Date	Governing Law	Termination Date	Controlling Interest	Override Registration	Version No	Trust Version Status	Trust Status	Note	Registration Time	Registered by User	Date of last update by the Trustee
TRUST 331	26/03/2022 00:00:00	test_26_3_2022 changed	Express Trust	Germany	01/01/2009	st_covering_law	25/02/2023	Yes	✓	7	Finalized - Published	Active	—	27/03/2022 10:08:24	Papadimitrou Andros	27/03/2022 10:13:00
TRUST 345	09/03/2022 00:00:00	Pavlos Trust Override V2	Express Trust	Cyprus	23/02/2022	maria4		No	✓	3	Finalized - Published	Active	—	24/03/2022 10:10:03	Ioannou Maria	24/03/2022 10:12:04
TRUST 348	09/03/2022 00:00:00	Maria test real estate 3	Express Trust	Cyprus	08/03/2022	test		No	—	3	Finalized - Published	Active	—	24/03/2022 09:24:41	Ioannou Maria	24/03/2022 09:27:27
TRUST 350	16/03/2022 00:00:00	MARIA TRUST	Express Trust	Greece	11/03/2022	LAW		No	—	1	Finalized - Published	Active	—	16/03/2022 09:59:52	Aliciou Pavlos	16/03/2022 11:04:32
TRUST 347	09/03/2022 00:00:00	Maria Trust real estate	Express Trust	Austria	08/03/2022	test		No	—	1	Finalized - Published	Active	—	09/03/2022 11:51:58	Ioannou Maria	09/03/2022 11:56:08
TRUST 346	09/03/2022 00:00:00	Maria Business Trust	Express Trust	Cyprus	08/03/2022	maria7		No	—	1	Finalized - Published	Active	—	09/03/2022 09:27:06	Ioannou Maria	09/03/2022 09:31:36
TRUST 344	09/03/2022 00:00:00	Pavlos Trust	Express Trust	Cyprus	01/03/2022	maria7		No	—	1	Finalized - Published	Active	—	09/03/2022 08:03:56	Ioannou Maria	09/03/2022 08:37:10
TRUST 342	23/02/2022 00:00:00	maria trust	Express Trust	Italy	02/11/2021	law		No	—	2	Finalized - Published	Active	—	02/03/2022 10:20:54	Ioannou Maria	02/03/2022 10:26:09
TRUST 336	18/02/2022 00:00:00	DIRECTIVE DATE TRUST	Express Trust	Cyprus	08/01/2022	TEST 1		No	—	5	Finalized - Published	Active	—	25/02/2022 12:42:45	stefani CySECuser20	25/02/2022 12:45:24
TRUST 334	18/02/2022 00:00:00	VERSION 2 TRUST	Express Trust	Cyprus	01/02/2022	TEST2		No	✓	4	Finalized - Published	Active	—	23/02/2022 14:23:02	stefani CySECuser20	24/02/2022 13:06:05
TRUST 341	22/02/2022 00:00:00	TEST 22_2_2022 3	Express Trust	Bulgaria	01/02/2022	test		No	✓	8	Finalized - Published	Active	—	23/02/2022 13:40:23	Papadimitrou Andros	23/02/2022 13:41:25
TRUST 343	23/02/2022 00:00:00	TRUSTEE DATE	Express Trust	Cyprus	01/02/2022	TEST		No	✓	2	Finalized - Published	Active	—	23/02/2022 11:27:19	stefani CySECuser20	23/02/2022 11:34:05
TRUST 340	22/02/2022 00:00:00	TEST 22_02_2022_1	Express Trust	Bulgaria	08/02/2022	Test Governing Law 2		No	✓	1	Finalized - Published	Active	—	22/02/2022 15:30:19	Papadimitrou Andros	22/02/2022 15:31:49
TRUST 339	22/02/2022 00:00:00	TEST 22_02_2022	Express Trust	Belgium	15/02/2022	Test governing law		No	✓	1	Finalized - Published	Active	—	22/02/2022 15:21:00	Papadimitrou Andros	22/02/2022 15:22:19
TRUST 335	18/02/2022 00:00:00	TRANSFER REQUEST TRUST	Express Trust	Cyprus	01/02/2022	TEST		No	✓	1	Finalized - Published	Active	—	18/02/2022 11:48:04	Maria G CySECuser22	18/02/2022 11:56:10
TRUST 330	15/02/2022 00:00:00	REAL ESTATE TRUST	Express Trust	Cyprus	25/01/2022	TEST		No	—	1	Finalized - Published	Active	—	15/02/2022 19:27:28	Alexiou Pavlos	15/02/2022 19:30:45

Catalog of Trusts Registry

Beneficial Ownership Registry ID	Trust Name	Trust Type	Country of Establishment	Governing Law	Trust Status	Register at	Register by	Last Update Time	Request ID
TRUST.231	PJ TRUST	Legal Arrangement Similar to Trust	Cyprus	TEST	Deleted	04/10/2021 11:10:42	Ioannou Maia	04/10/2021 11:54:02	164
TRUST.199	test 7_7_2021	Express Trust	Bulgaria	test	Deleted	07/07/2021 17:32:13	Papaloannou Andreas	07/09/2021 12:49:18	150
TRUST.199	test 7_7_2021	Express Trust	Bulgaria	test	Deleted	07/07/2021 17:32:13	Papaloannou Andreas	07/09/2021 12:54:32	149

List of Accessible Trusts

Registry Code	Registry Entry Date	Beneficial Ownership Register ID	Trust Name	Trust Type	Country of Registration	Exemption Reason	Publishing Test Items Verified by Cysec	Cysec Comments	Exempted Trust Status	Request Status	Version No	Registration Time	Registered by User
TRUST.EXC.308	27/12/2021 00:00:00	987654	MPP Trust	Express Trust	Cyprus		✓	test308	Active	Finalized - Published	1	27/12/2021 14:17:38	Pelleyan Neussan
TRUST.EXC.305	21/12/2021 00:00:00	12	EXE	Express Trust	Austria		✓		Active	Finalized - Published	1	21/12/2021 12:53:40	Ioannou Maria
TRUST.EXC.294	29/11/2021 00:00:00	freea	freea	Express Trust	Cyprus		✓	testing 29/11/2021	Active	Finalized - Published	1	29/11/2021 11:35:41	GEORGIOUKS ANDREAS
TRUST.EXC.274	22/11/2021 00:00:00	Austrian	Example 2	Express Trust	Cyprus		✓	testing 22-11-2021	Active	Finalized - Published	1	22/11/2021 13:51:19	Hedgigorgiou Irene
TRUST.EXC.272	22/11/2021 00:00:00	268	NX TRUST	Express Trust	Cyprus		✓	test22-11-2021	Active	Finalized - Published	1	22/11/2021 12:56:39	xerofiotos rocky
TRUST.EXC.266	23/11/2021 00:00:00	test	Example 1	Legal Arrangement Similar to Trust	Cyprus		✓	testing 23/11/2021	Active	Finalized - Published	1	18/11/2021 14:04:27	Hedgigorgiou Irene
TRUST.EXC.260	17/11/2021 00:00:00	45566456	mpa	Express Trust	Cyprus		✓	test	Active	Finalized - Published	1	17/11/2021 16:16:15	GEORGIOU MARIA
TRUST.EXC.250	29/10/2021 00:00:00	LONDON_01910	Test Exempted Trust 2021	Express Trust	Belgium		✓	the request is verified	Active	Finalized - Published	1	29/10/2021 15:09:13	Ioannou Maria
TRUST.EXC.248	28/10/2021 00:00:00	1234	test	Express Trust	Austria		✓		Active	Finalized - Published	1	28/10/2021 15:50:11	Papaloannou Andreas
TRUST.EXC.242	15/10/2021 00:00:00	54	MARIA EXEMPT	Express Trust	Austria		✓		Active	Finalized - Published	1	15/10/2021 10:44:28	Ioannou Maria
TRUST.EXC.230	30/09/2021 00:00:00	123	EXEMPTED TRUST REQUEST	Express Trust	Austria		✓		Active	Finalized - Published	1	30/09/2021 11:05:29	Ioannou Maria
TRUST.EXC.225	17/09/2021 00:00:00	test	test	Express Trust	Bulgaria		✓		Active	Finalized - Published	1	17/09/2021 14:11:33	Papaloannou Andreas
TRUST.EXC.206	09/09/2021 00:00:00	123	StephanicTrust	Express Trust	Austria		✓		Active	Finalized - Published	1	09/09/2021 09:45:13	test maria
TRUST.EXC.186	30/07/2021 00:00:00		MarieExempt_version2	Express Trust	Cyprus		✓		Active	Finalized - Published	1	30/07/2021 11:04:18	Alexiou Pavlos
TRUST.EXC.130	16/06/2021 00:00:00	TRUST EXEMPTED 21	test exempted	Express Trust	Bulgaria		✓		Active	Finalized - Published	1	16/06/2021 15:44:06	Papadopoulos George

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

Beneficial Ownership Register ID	Registry Entry Date	Trust Name	Trust Type	Country of Establishment	Date of Establishment	Governing Law	Controlling Interest	Version No	Trust Version Status	Trust Status	Deletion Date	Deletion Requested by Trustee	Registration Time	Registered by User
TRUST135	22/06/2021 00:00:00	CHRISTOS FAMILY TRUST	Express Trust	Cyprus	16/06/2021	The trustees law	Yes	1	Finalized - Published	Deleted	13/09/2021	22/06/2021 09:15:47	Papadopoulos George	
TRUST159	26/07/2021 00:00:00	test 7_2021	Express Trust	Bulgaria	01/01/1999	test	No	1	Finalized - Published	Deleted	08/09/2021	07/07/2021 17:32:13	Papadopoulos Andreas	
TRUST128	12/06/2021 00:00:00	Test Trust 1	Express Trust	Greece	10/06/2021	Test Trust 1	No	6	Finalized - Published	Deleted	20/07/2021	16/06/2021 18:01:42	Papadopoulos George	
TRUST169	23/07/2021 00:00:00	test	Legal Arrangement Similar to Trust	Cyprus	29/07/2021	TEST	No	1	Finalized - Published	Deleted	23/07/2021	22/07/2021 09:55:46	test maria	
TRUST178	23/07/2021 00:00:00	Stavros Trust	Express Trust	Bulgaria	23/07/2021	tes	No	1	Finalized - Published	Deleted	07/09/2021	23/07/2021 12:29:47	test maria	
TRUST209	09/09/2021 00:00:00	StephanieTrustNormal	Express Trust	Cyprus	08/09/2021	>3<	No	1	Finalized - Published	Deleted	13/09/2021	09/09/2021 10:29:29	test maria	
TRUST155	05/07/2021 00:00:00	ANNE FAMILY TRUST	Express Trust	Cyprus	15/05/2018	CYPRUS LAW	No	2	Finalized - Published	Deleted	13/09/2021	09/09/2021 12:58:10	Ioannou Maria	
TRUST223	14/09/2021 00:00:00	exempted info trust	Express Trust	Cyprus	01/09/2021	test	No	1	Finalized - Published	Deleted	14/09/2021	13/09/2021 13:31:25	Ioannou Maria	
TRUST218	30/09/2021 00:00:00	MEETING	Express Trust	Cyprus	01/09/2021	TEST	Yes	1	Finalized - Published	Deleted	21/09/2021	13/09/2021 11:39:00	Ioannou Maria	
TRUST195	30/09/2021 00:00:00	JOHNNY TRUST	Express Trust	Cyprus	11/01/2016	TEST	No	1	Finalized - Published	Deleted	09/09/2021	06/09/2021 12:20:23	Ioannou Maria	
TRUST157	30/09/2021 00:00:00	SP FAMILY TRUST	Express Trust	Cyprus	17/01/2016	CYPRUS LAW	No	1	Finalized - Published	Deleted	05/10/2021	07/07/2021 11:58:25	Ioannou Maria	
TRUST231	04/10/2021 00:00:00	RU TRUST	Legal Arrangement Similar to Trust	Cyprus	19/02/2020	TEST	Yes	1	Finalized - Published	Deleted	30/10/2021	04/10/2021 11:10:43	Ioannou Maria	
TRUST236	11/10/2021 00:00:00	ANNA TRUST	Legal Arrangement Similar to Trust	Cyprus	18/06/1992	TEST	Yes	1	Finalized - Published	Deleted	09/09/2021	11/10/2021 11:18:19	Ioannou Maria	
TRUST249	29/10/2021 00:00:00	Test Express Trust 2021	Express Trust	Lithuania	01/01/1990	Law 1989 new version	No	2	Finalized - Published	Deleted	31/10/2021	29/10/2021 14:59:30	Ioannou Maria	
TRUST257	16/11/2021 00:00:00	MGA	Express Trust	Cyprus	01/01/2020	Cyprus International Trust Law	Yes	2	Finalized - Published	Deleted	01/01/2021	16/11/2021 16:48:41	GEORGIOU MARIA	
TRUST276	22/11/2021 00:00:00	The Christina Trust	Express Trust	Cyprus	20/09/2011	Cyprus Republic of Cyprus	No	1	Finalized - Published	Deleted	22/11/2021	22/11/2021 20:50:56	Test Christina	
TRUST279	23/11/2021 00:00:00	AFT Trust	Express Trust	Cyprus	22/11/2021	SOUTH AFRICA	Yes	1	Finalized - Published	Deleted	23/11/2021	23/11/2021 07:46:48	xenofontos nicky	
TRUST275	22/11/2021 00:00:00	SAB TRUST	Express Trust	Cyprus	13/11/2021	CYPRUS	No	2	Finalized - Published	Deleted	22/11/2021	22/11/2021 16:39:50	xenofontos nicky	
TRUST285	23/11/2021 00:00:00	AAA Trust	Express Trust	Cyprus	01/11/2021	Cyprus	No	1	Finalized - Published	Deleted	26/11/2021	23/11/2021 11:27:25	s s	
TRUST286	23/11/2021	aaa	Finance Trust	Cyprus	01/11/2021	Cy	No	1	Finalized - Published	Deleted	23/11/2021	23/11/2021	s s	

List of Deleted Trusts from the Register (Deleted Trusts)

Beneficial Ownership Register ID	Registry Entry Date	Trust Name	Trust Type	Country of Establishment	Date of Establishment	Version No	Trust Version Status	Trust Status	Suspension Date From	Suspension Reason	Other Suspension Reason (description)	Suspension Comments	Compliance Deadline	Registration Time	Registered by User	Last Update Time
TRUST132	16/06/2021 00:00:00	test 4444	Express Trust	Greece	01/06/2021	1	Finalized - Published	Suspended	25/06/2021	Information provided based on article 61C of AML Law is incomplete, inaccurate or false			30/07/2021	16/06/2021 18:52:35	Papadopoulos George	16/06/2021 18:52:35
TRUST133	08/07/2021 00:00:00	test	Express Trust	Cyprus		1	Finalized - Published	Suspended	02/09/2021	Information provided based on article 61C of AML Law is incomplete, inaccurate or false			17/09/2021	29/06/2021 16:51:27	Papadopoulos Andreas	08/07/2021 15:45:15
TRUST366	19/05/2022 00:00:00	test for legal entity	Express Trust	Belgium	03/05/2022	0	Finalized - Published	Suspended	01/09/2022	Information provided based on article 61C of AML Law is incomplete, inaccurate or false	ok		24/09/2022	04/09/2022 12:05:45	Ioannou Maria	04/09/2022 12:07:13

List of Suspended Trusts

ID	Report Status	Reported Trust	Analytical Description	Submission Date	Evaluation Date	Evaluation Result	Action Deadline	Action Is Completed	Completion Date	Registration Time	Registered by User
70	Action Completed	PJ TRUST	TEST	15/10/2021	15/10/2021 10:33:47	Action Required	18/10/2021	✓	15/10/2021 10:36:58	15/10/2021 10:28:56	Papastratos Alexis
64	Action Completed	StephanieTrustNormal		10/09/2021	10/09/2021 13:37:34	Action Required	13/09/2021	✓	10/09/2021 13:38:06	10/09/2021 13:36:35	Papastratos Alexis
61	Submitted	Stavros Trust	test	06/08/2021		Action Required	31/08/2021			06/08/2021 09:39:23	Papastratos Alexis
55	Action Completed	CHRISTOS FAMILY TRUST	test	16/07/2021	16/07/2021 11:49:56	Action Required	31/07/2021	✓	16/07/2021 11:54:21	16/07/2021 11:46:53	Papastratos Alexis
50	Draft	CHRISTOS FAMILY TRUST	test							14/07/2021 13:42:35	Papastratos Alexis

List of My Discrepancy Reports

Request Kind	Status	Trust Name	BO Registry ID	Accessible Trust	Important Note	Is Confirmed (Cysac)	Is Approved (Trustive)	Access Deadline	Submission Date	Evaluation Date	Trust Version	Trust Under Access	Registration Time	Registered by User
	Evaluated			ANNA TRUST		—		10/10/2021	11/10/2021 00:00:00	11/10/2021 12:53:02	231	—	11/10/2021 12:46:40	Papastratos Alexis
	Evaluated			PJ TRUST	Access is already granted for this Trust	—		30/10/2021	05/10/2021 00:00:00	31/10/2021 22:54:19	227	—	05/10/2021 10:07:33	Papastratos Alexis
	Draft			PJ TRUST	Access is already granted for this Trust						227		05/10/2021 10:07:11	Papastratos Alexis
	Evaluated			PJ TRUST		✓			04/10/2021 00:00:00	04/10/2021 11:54:02	227	✓	04/10/2021 11:51:20	Papastratos Alexis
	Evaluated			BP FAMILY TRUST		—		29/09/2021	30/09/2021 00:00:00	30/09/2021 13:45:56	199	—	30/09/2021 13:18:27	Papastratos Alexis
	Submitted			CHRISTOS FAMILY TRUST					13/09/2021 00:00:00		140		13/09/2021 09:50:16	Papastratos Alexis
	Evaluated			StephanieTrustNormal		—		12/09/2021	13/09/2021 00:00:00	13/09/2021 10:19:00	209	—	13/09/2021 08:19:12	Papastratos Alexis
	Evaluated			test_7_7_2021	Access is already granted for this Trust	✓		30/09/2021	05/09/2021 00:00:00	07/09/2021 12:49:18	160	—	05/09/2021 11:22:40	Papastratos Alexis
	Evaluated			test_7_7_2021	Access is already granted for this Trust	✓		23/09/2021	05/09/2021 00:00:00	07/09/2021 12:54:32	160	—	05/09/2021 11:22:27	Papastratos Alexis
	Submitted			CHRISTOS FAMILY TRUST					25/08/2021 14:14:50		140		25/08/2021 14:12:31	Papastratos Alexis

List of My Access Requests

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

Menu	Mode	Position	Reference
Trusts Registry	File a Report (Discrepancy Report Entry)	Recordset	Chapter 3.3.1

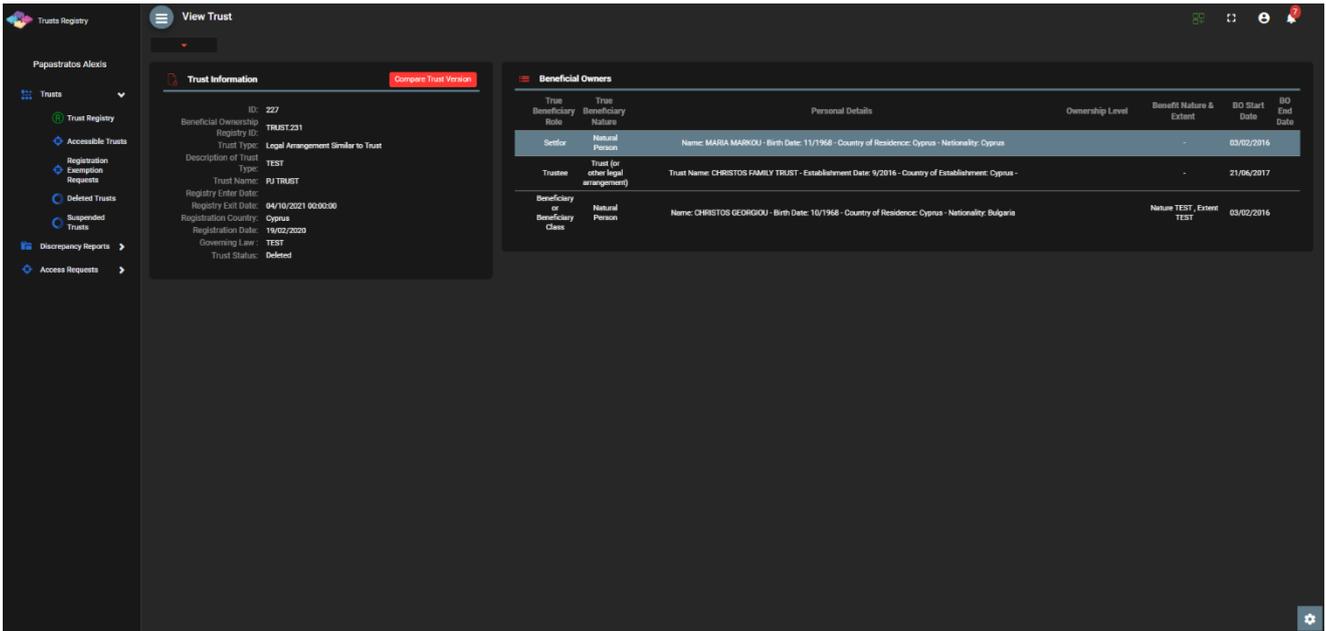
	Request Access by Trustee (Registration of Access Request with direct correlation with Trust)	Recordset	Chapter 3.4.1
Accessible Trusts	View Trust (Confidence Data Overview)	Recordset	Chapter 3.2.1
My Discrepancy Reports	Edit Report (Discrepancy Report Entry in edit mode)	Recordset	Chapter 3.3.1
	Submit Report (Submission of Discrepancy Report) <i>This feature is only allowed if the report is in Draft mode.</i>	Recordset	Chapter 3.3.2
	Cancel Report (Cancellation of Discrepancy Report) <i>This feature is only allowed if the report is in Draft mode.</i>	Recordset	Chapter 3.3.3
My Access Requests	Submit (Request for Access) <i>This feature is only allowed if the request is in Draft mode.</i>	Recordset	Chapter 3.4.2
	Edit (Registration of Access Request with direct correlation with Trust in edit mode) <i>This feature is only allowed if the request is in Draft mode.</i>	Recordset	Chapter 3.4.1
	Delete (Delete Access Request) <i>This feature is only allowed if the request is in Draft mode.</i>	Recordset	Chapter 3.4.3

Provided Functions at Trust level per Directory

3.2. Registry Trust Management

3.2.1 View Trust

This feature provides access to a Trust file, however restricting access to the details of the Real Beneficiaries (ie it does not provide access to the detailed tabs of the actual beneficiaries).

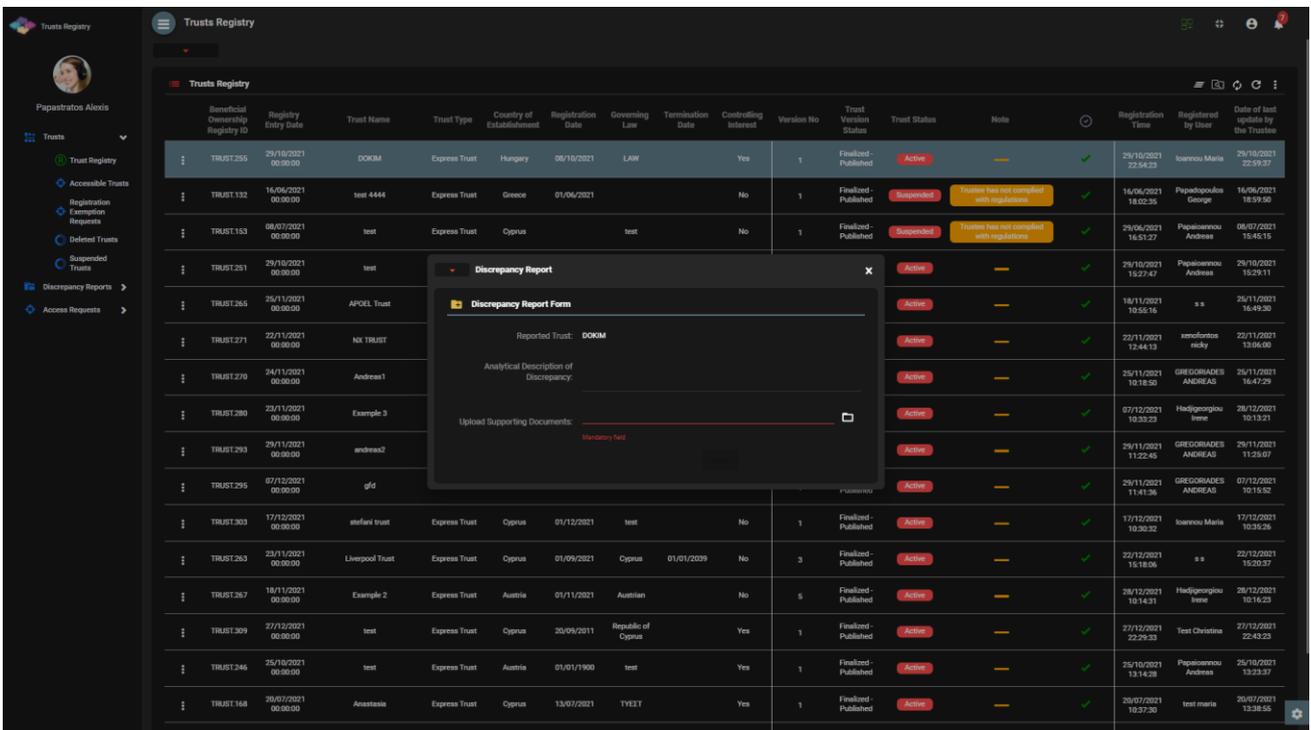


Overview of Confidence Data

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

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.

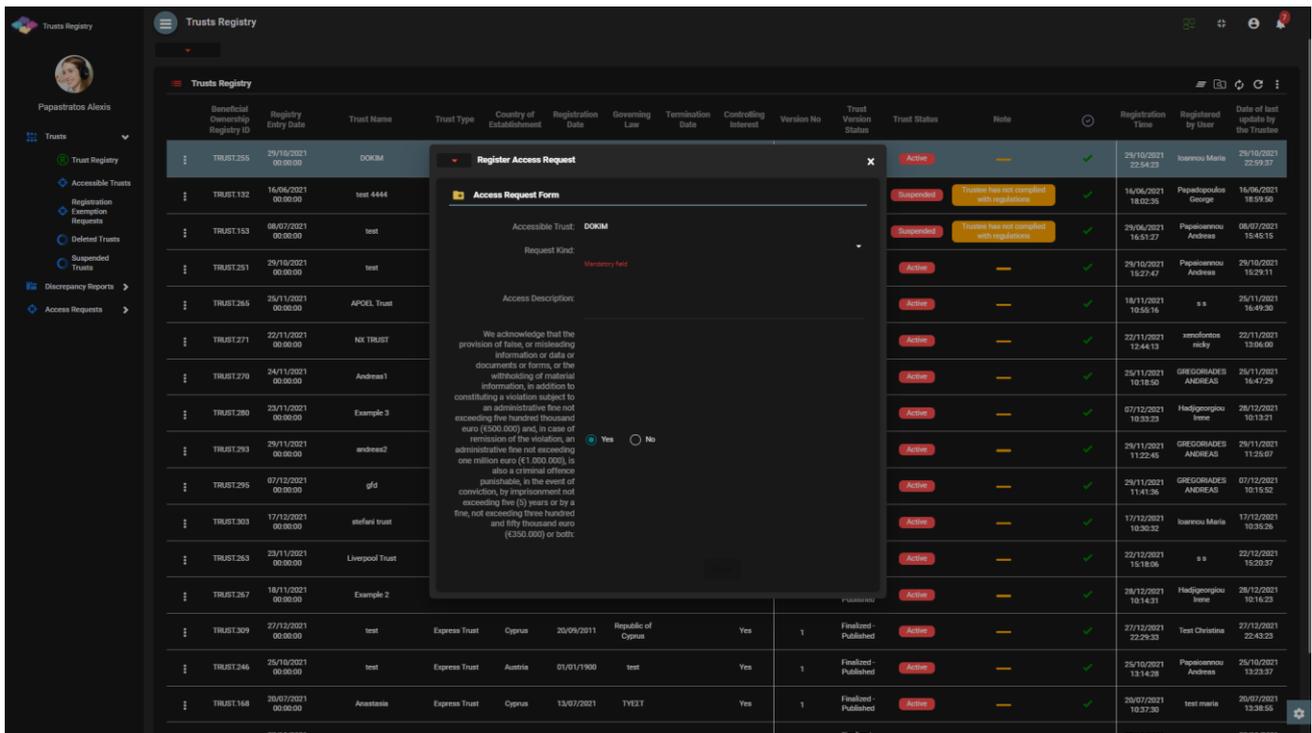


The above function is allowed only if the selected Discrepancy Report is in Draft mode.

3.4 Access Request Management

3.4.1 Submit Request Access by Trustee

The purpose of this function is to enter an Access Request for a Trust from the Register Trusts directory. It concerns requests such as "There is a business relationship with an express trust or similar legal arrangement", which require confirmation from the trustee of the Trust.



Request Access by Trustee Registration Screen

To enter 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
Request Kind	Default price: a) There is a business relationship with an express trust or similar legal arrangement »	YES	YES	Request Type
Access Description	Text field	YES	NO	Request description
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) 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 hundred and fifty thousand euro (€350,000) or both.	Confirmation message	YES	YES	Confirmation <i>The field receives a default NAI value</i>

<p>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 hundred and fifty thousand euro (€ 350,000) or both</p>				
--	--	--	--	--



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

The new Registration 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 updates 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, as well as to the Trustee of the relevant trust.



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



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



The access request is now accessible by the Trustee who manages the said Trust, in order to proceed with its verification.

3.4.3 Delete Request for Access (Delete)

The purpose of this function is to (physically) delete an Access Request from the user who has registered it.



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



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