CYPRUS SECURITIES AND EXCHANGE COMMISION

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

User Manual for Access to CyTBOR by Trustees of Express Trusts and Persons Holding Equivalent Positions with a Trustee in a Similar Legal Arrangement

Date: 05.04.2022

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

CONTENTS

1. Introduction 5
2. Horizontal Functions 6
2.1. Common Functions in Lists 6
2.2. User Registration & Subscription Management functions 9
2.2.1. User Registration (Sign Up).....9
2.2.2. Subscription Payment.....15
2.2.3. Subscription Management.....17
3. Access by 'Trustee of express trusts or Persons holding equivalent positions in similar legal arrangements' in accordance with the provisions of Article 61C (5) (b) (i), (ii) of the AML / CFT Law 20
3.1. Menus 20
3.2. Registry Trust Management 29
3.2.1. Register a Trust or Legal arrangement similar to a Trust 29
3.2.2. Cancel Latest Draft Version.....32
3.2.3. Create a New Trust Version (Register New Trust Version) 32
3.2.4. Manage Trust.....33
3.2.5. Validate Issue Check.....35
3.2.6. Publish 36
3.2.7. Edit Trust Version 37
3.2.8. Issue Proof of Registration.....38
3.2.9. Register Beneficial Owner 39
3.2.10.Trust Declared as a Beneficial Owner of a Trust registered in the Register (Manage Trust).....50
3.2.11. Registration of a Beneficial Owner of a Trust who is the Beneficial Owner of an Express Trust ..... registered in the Register..... 51
3.2.12. Overview of Beneficial Owners / Senior Managing Officials 51
3.2.13 Registration of a Beneficial Owner/ Senior Managing Official (Register Beneficial Owner).....52
3.2.14. Declare as Deleted.....56
3.3 Trust Management with a request for exemption from the Register.....58
3.3.1. Request Exemption from Registration 58
3.3.2. Deletion of a Trust Exemption Request from the Register 60
3.3.3. Management of Exemption Requests.....60
3.3.4. Exemption Request Check (Validate).....61
3.3.5. Publish Exemption Request 62
3.3.6. Register Trustee in Exemption Request (Register Trustee) 63
3.3.7. Register Business Relationship Request 64
3.3.8. Cancel Registration Exemption 65
3.4.Natural Person Management 66
3.4.1. Register Natural Person 66
3.4.2. Involvement in Registry Trusts (Beneficial Ownerships) 68
3.4.3. Participation in Legal Entities (Ownership & Control in Legal Entities) 69
3.5.Legal Entity Management 69
3.5.1. Register Legal Entity 69
3.5.2. Involvement in Registered Trusts (Beneficial Ownerships) 72
3.5.3. Beneficial Owners / Managing Officials Overview 72
3.5.4. Registration of a Beneficial Owner/ Senior Managing Official (Register Beneficial Owner).....72
3.6. Secondary Trust Management.....72

3.6.1. Involvement in Registered Trusts (Beneficial Ownerships) 72
3.7. Discrepancy Report Management 73
3.7.1. Review of Discrepancy Report (Review) 73
3.7.2. Complete Review of Discrepancy Report (Complete Review) 74
3.8. Access Request Management 74
3.8.1. Trustee Access Request Check 74
3.8.2. .....Complete Access Request Check by the Trustee of the relevant Trust (Complete Review) 75
3.8.3. Cancel Trust Access 76
3.9. Access Exemption Request Management 76
3.9.1. Register Access Exemption Request 76
3.9.2. Complete Reasons Update 77
3.9.3. Submit Request for Access Exemption (Submit) 78
3.10. Trust Transfer Request Management 78
3.10.1. Register Trust Transfer Request 78
3.10.2. Edit and Delete a Trust Transfer Request 80
3.10.3. Submit Request for Transfer of Trust (Submit) 80
3.10.4. Provide Clarifications 81
3.10.5. Submit Clarifications 82
3.11. Overdue Registration of Trust Information 82

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 with the role of 'Trustee of an express trust or person holding an equivalent position in a legal arrangement similar to trust', taking into account the provisions of Article 61C (5) (b) (i), (ii) of the Prevention and Suppression of Money Laundering and Terrorist Financing Law of 2007 (188 (I) / 2007) (the 'AML/CFT Law').

2. Horizontal Functions

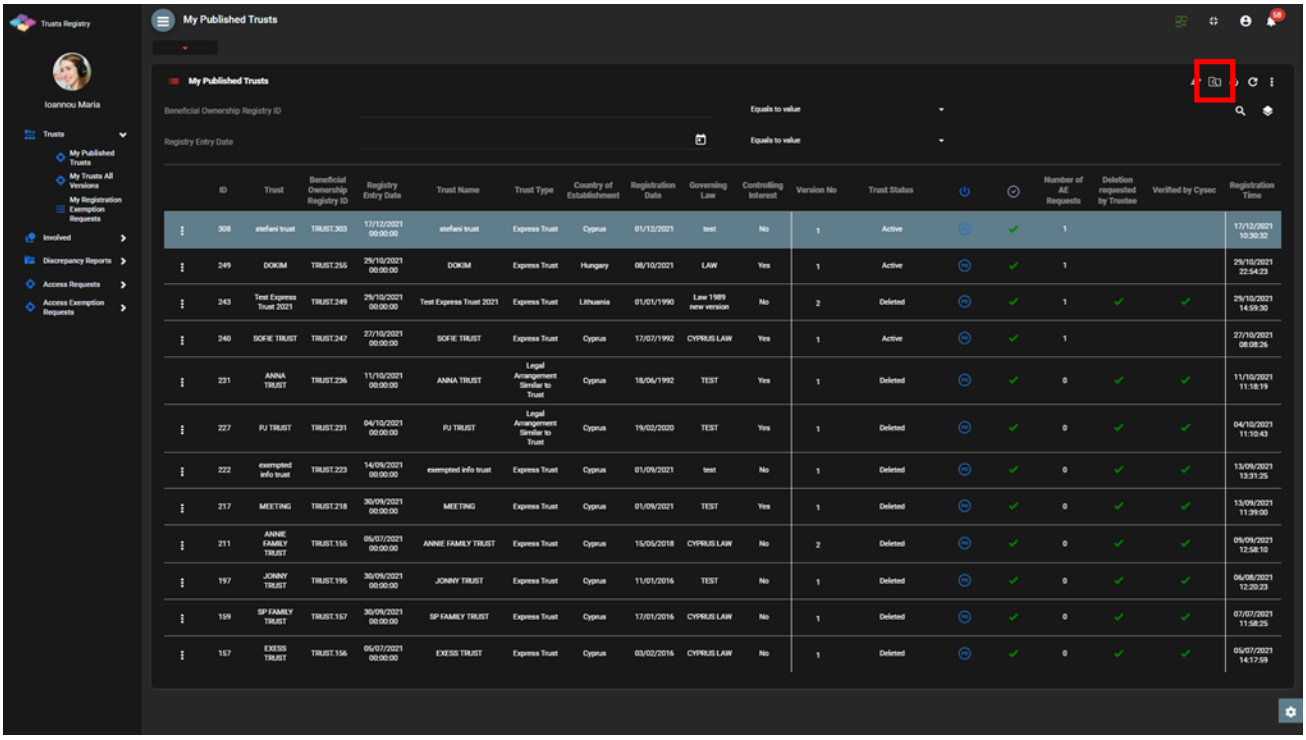
2.1. Common Functions in Lists

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].

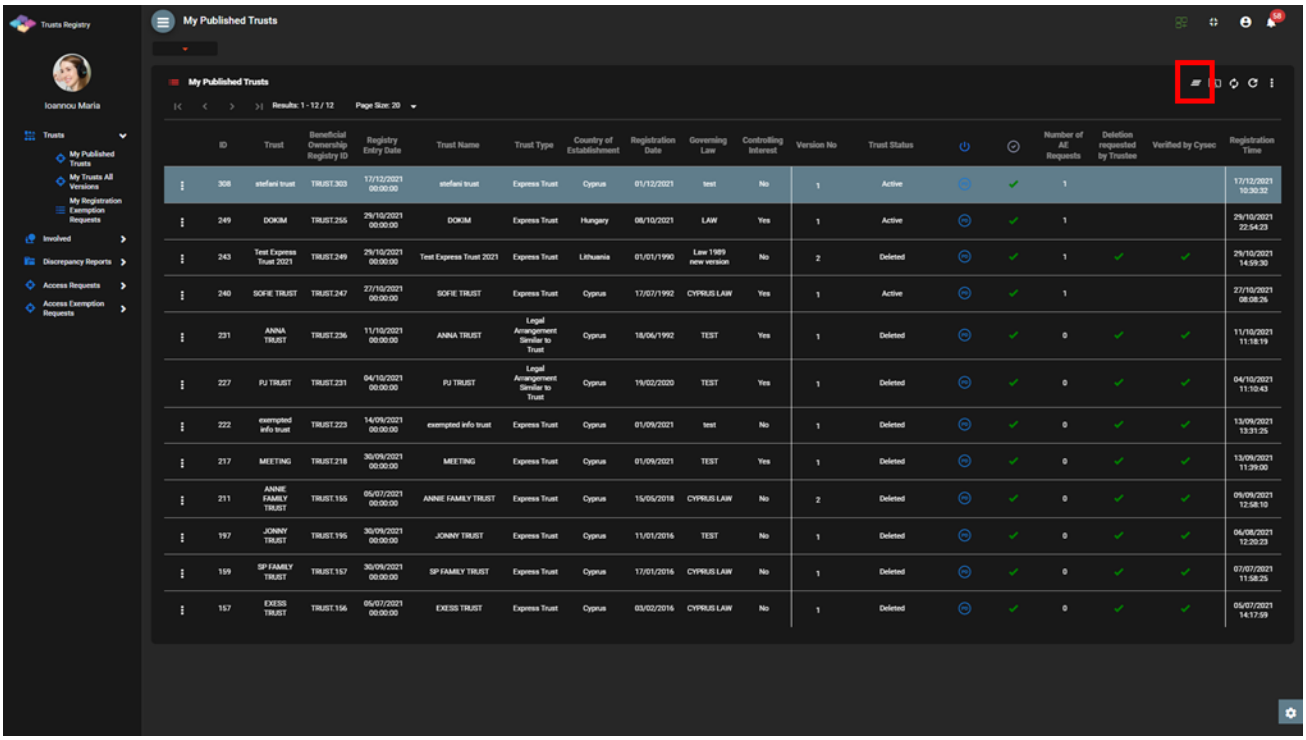
Mode	Button	Description
Quick search		By selecting the button from the list header, the system displays the criteria that can be used for quick search, and the user is asked to specify the search values and comparison operators. These criteria are always combined with an AND condition.
Pagination		By 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.

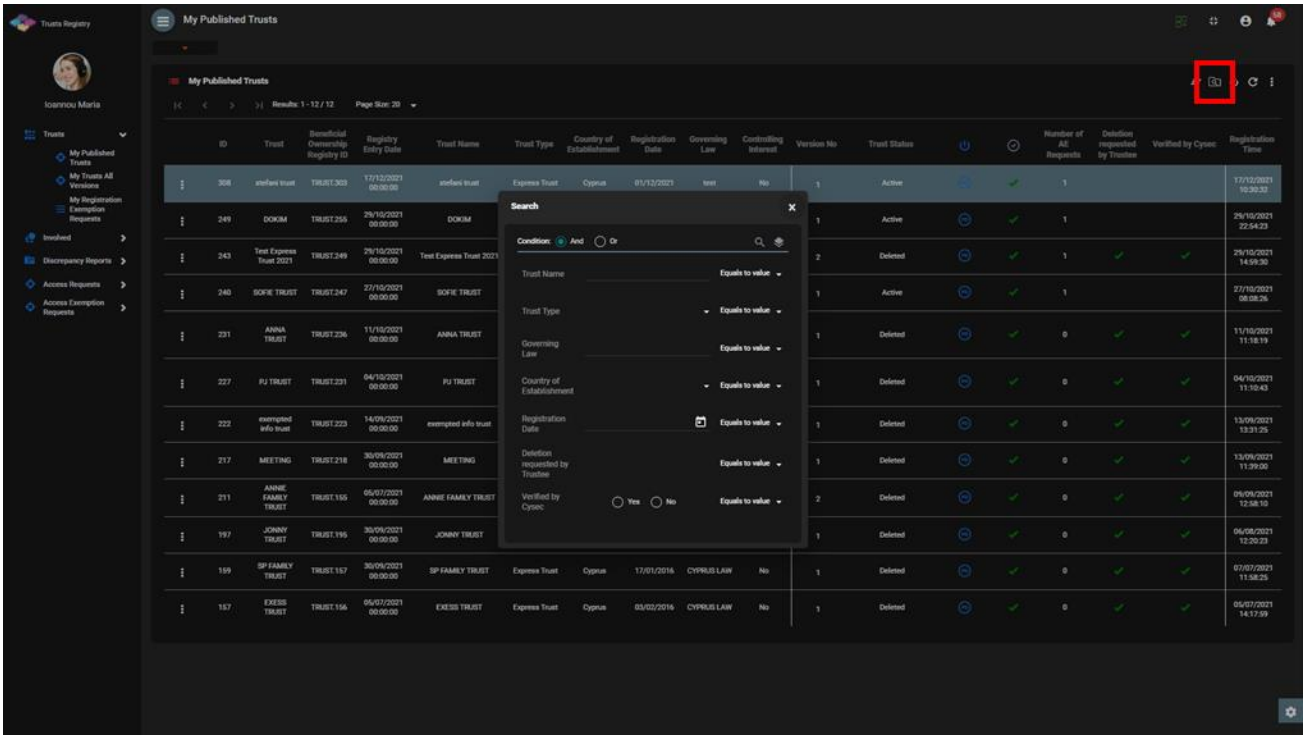
[1] In case these functions have been activated
[2] For this reason they may not all be visible in all the application lists of this project



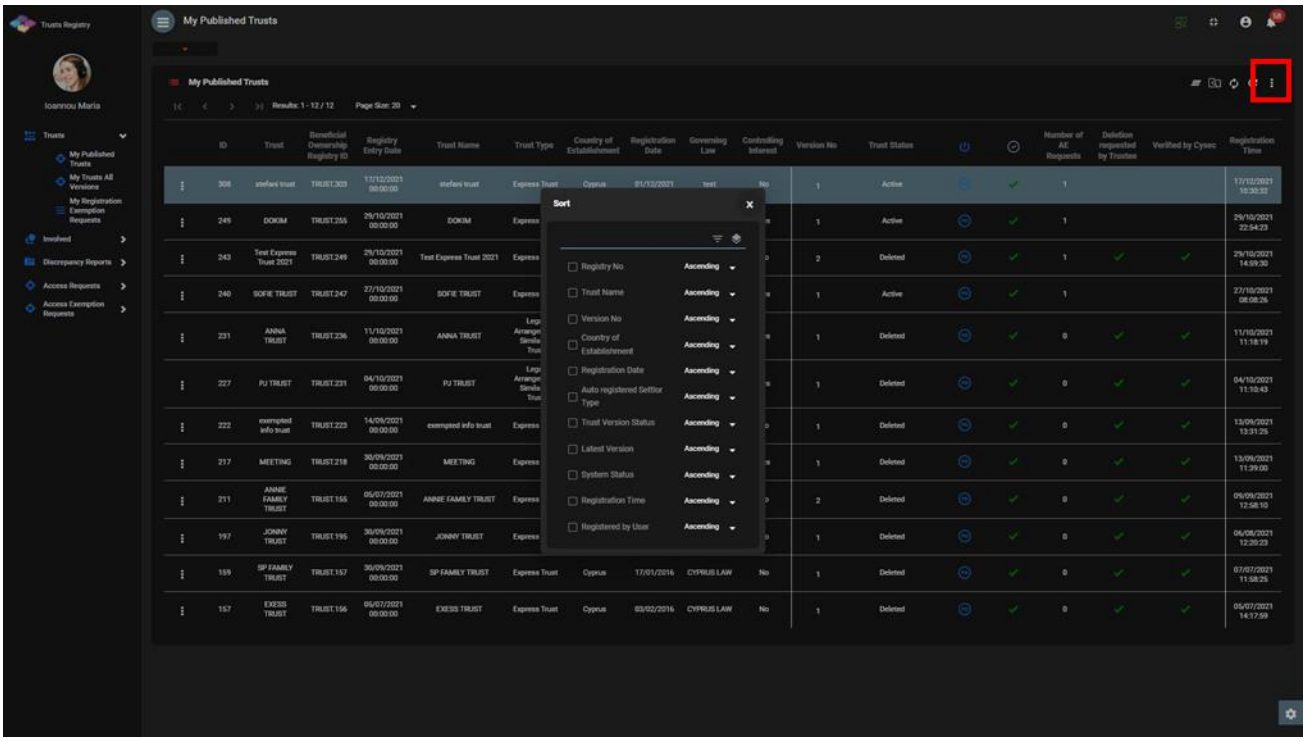
Quick Search Mode



Pagination Mode



Advanced Search Filters Defining Function

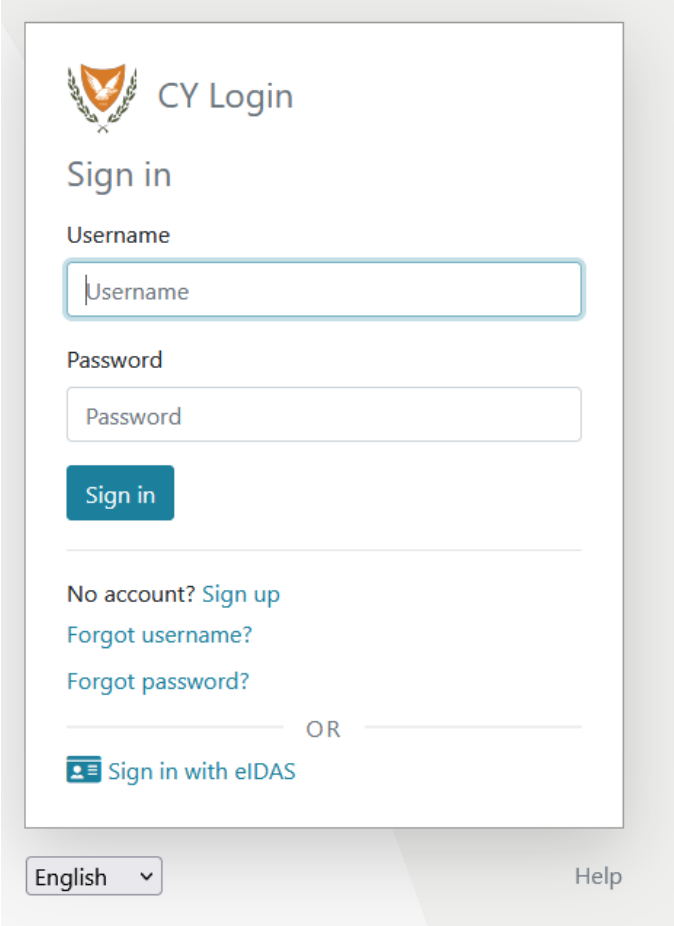


Advanced Sorting Field Defining Function

2.2. User Registration & Subscription Management functions

2.2.1. User Registration (Sign Up)

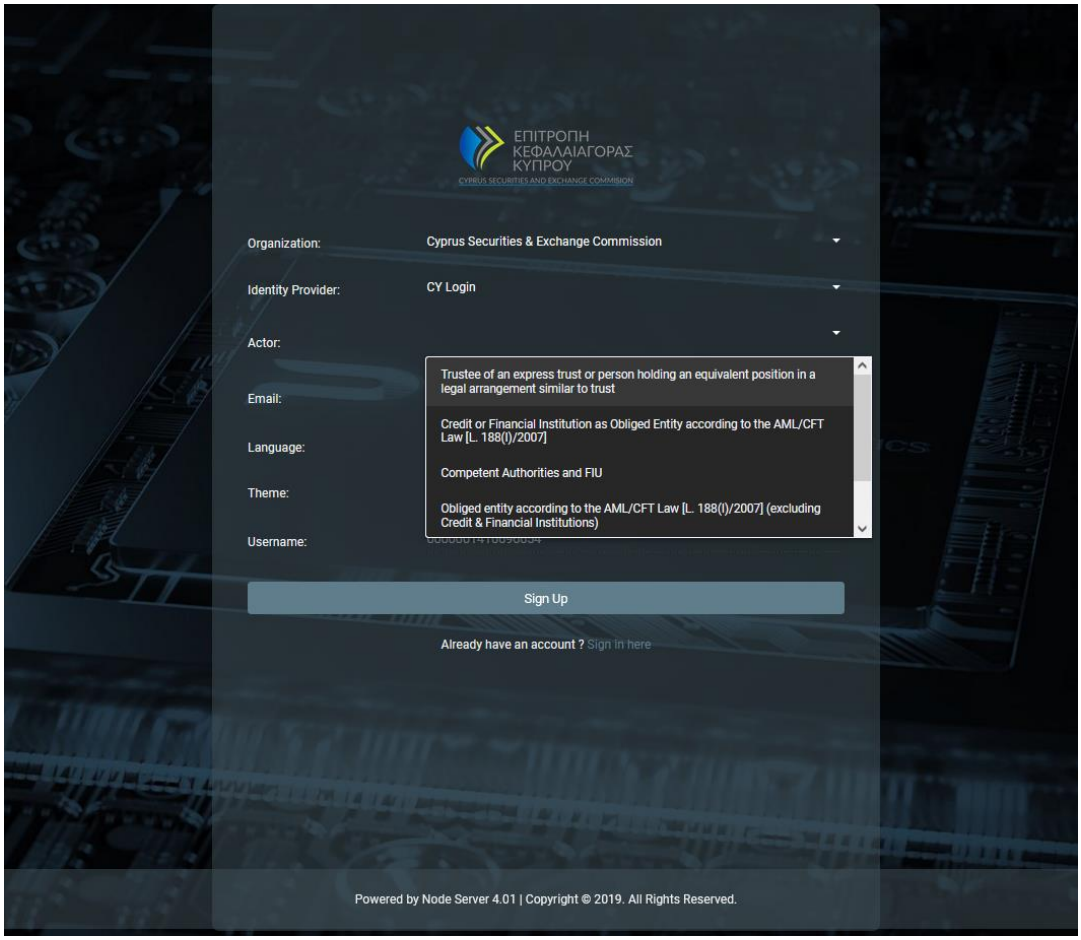
The user enters the system address (URL) and the system displays the login screen, where the user selects CY Login as the Digital Authentication service. The system refers the user to the relevant username & password page of CY Login so that he is authenticated.



CY Login 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:

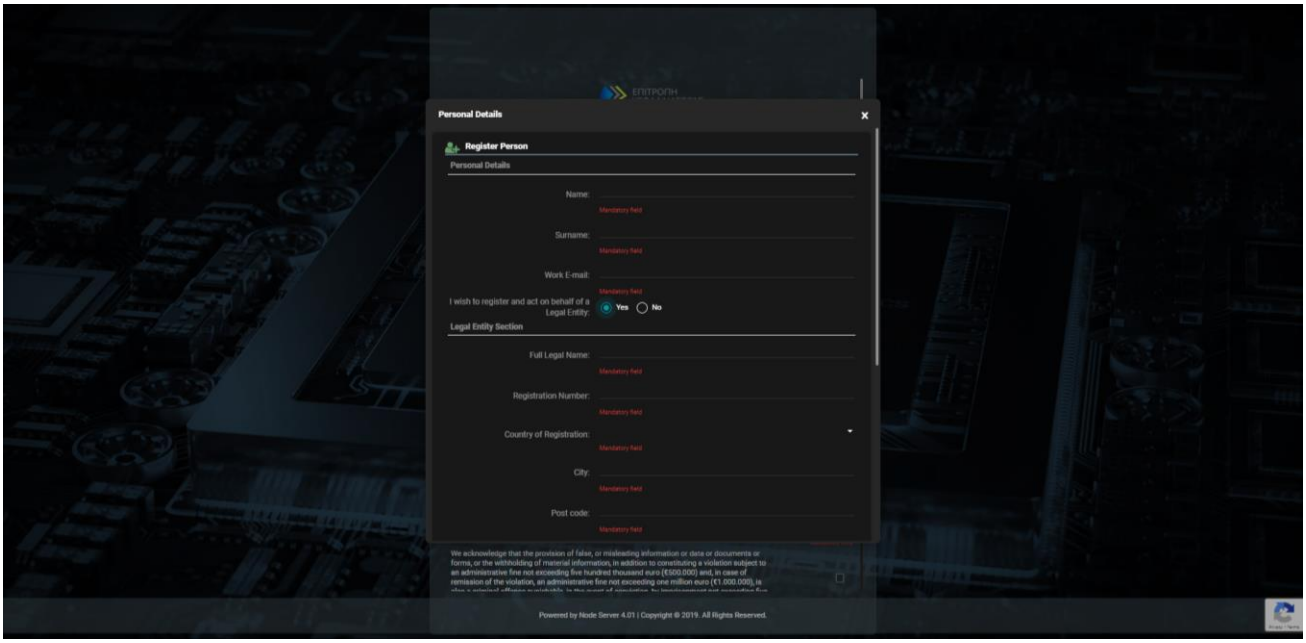
Field	Description
Organization	The organization (user group) to which the user wishes to register
Identity Provider	The Digital Authentication Service with which it wishes to be authenticated in the system *Note: The system displays the Digital Authentication Services to which the selected Organization 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

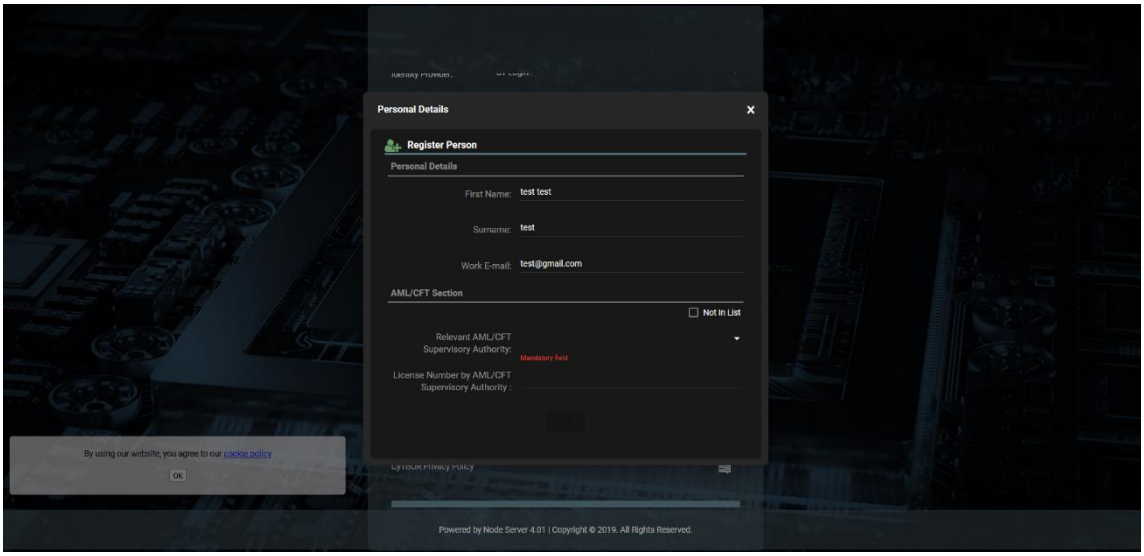
	Note: The above address should be unique to the system for the selected Organization and Digital Authentication Service
Language	The presentation language of the system screens desired by the user
Username	The unique user ID from cyLogin. The field is locked and cannot be modified.
Person	Details of 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 Person Form (pop up)





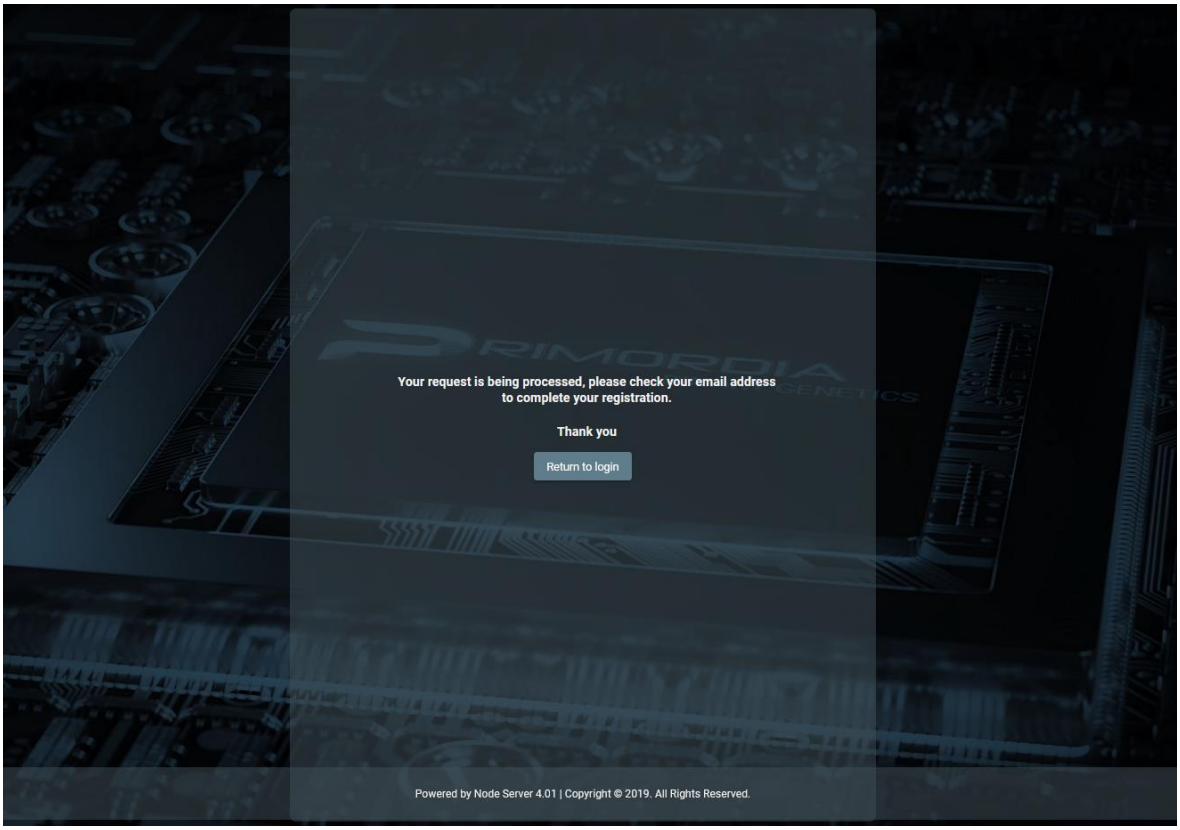
Individual Data Entry Form

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

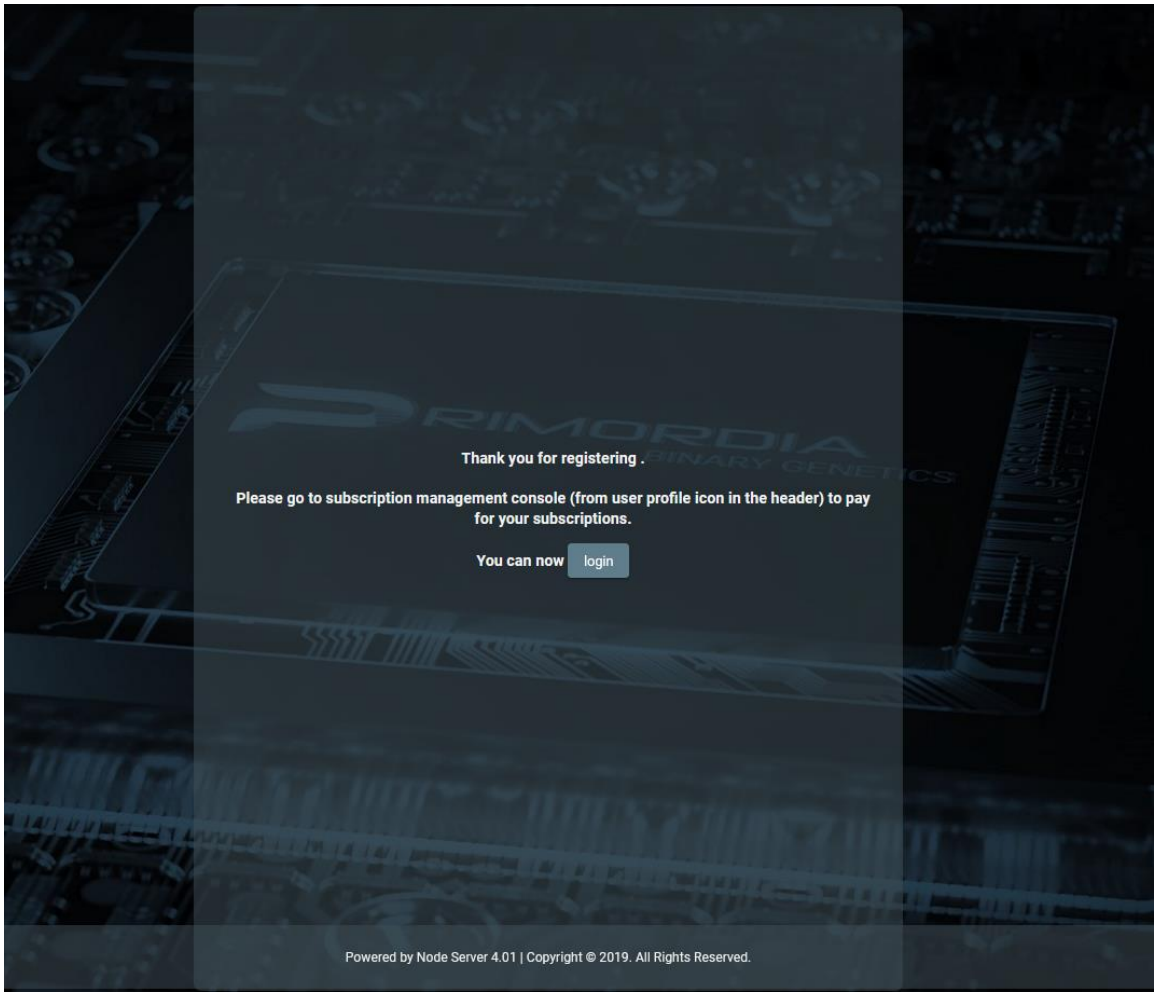
Field Name	Field Type	Shows up	Mandatory	Remarks
Person Section				
Name	Text field	YES	YES	Name
Surname	Text field	YES	YES	Last name
Work E-mail	E-mail field	YES	YES	Working E-Mail
I wish to register and act on behalf of a Legal Entity	Check box YES / NO (check box)	YES	YES	I wish to register and use the system on behalf of a Legal Entity *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



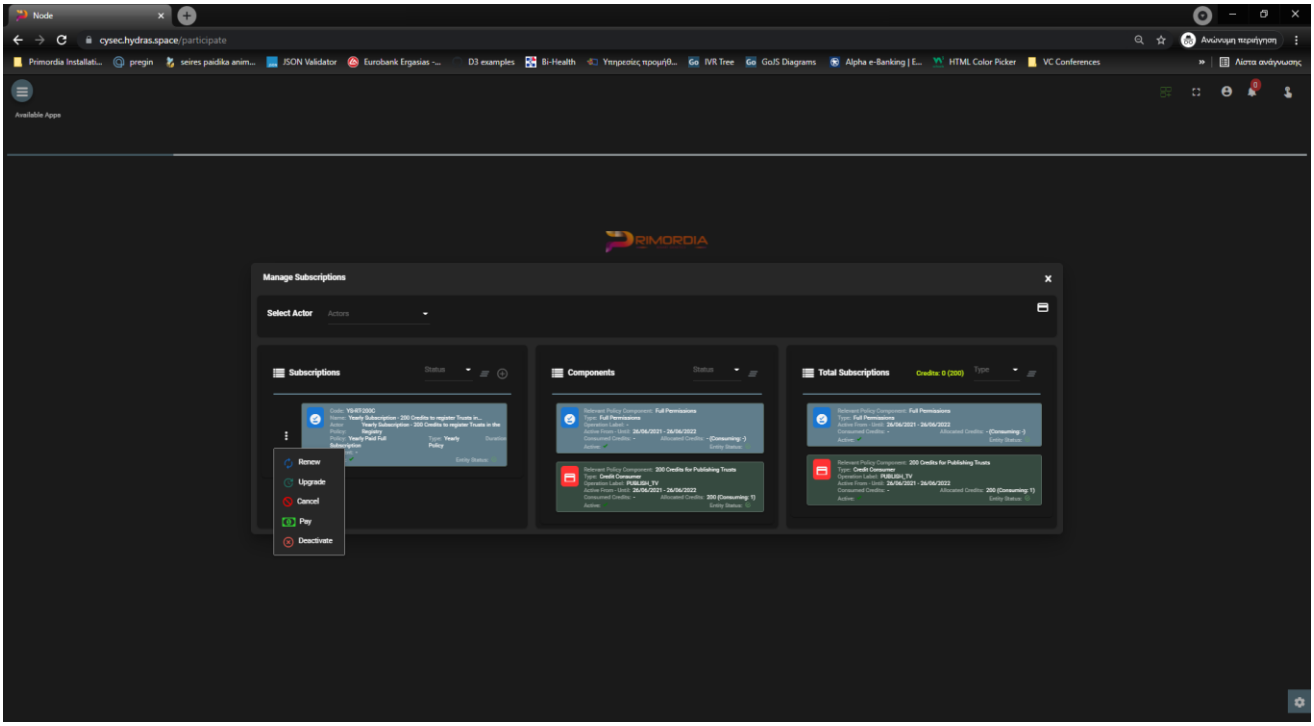
Email Message



Email Confirmation Message. Complete User Registration

2.2.2. 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 Payment function from the options menu at the recordset level of an unpaid payment. When the Payment 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

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 Payment function in the options menu

Upon completion of 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:

- Subscriptions whose "consolidated" statement 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 "consolidated" statement 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

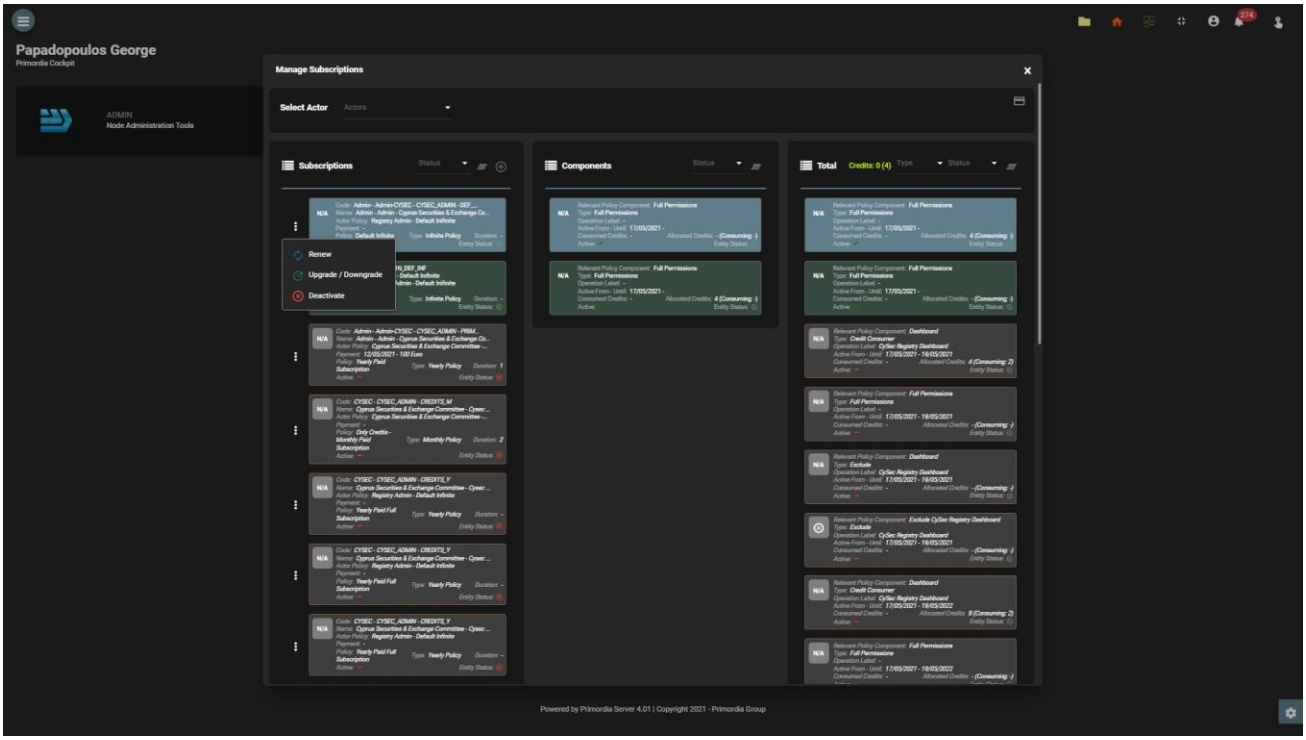
To renew a subscription, the user must select the Renew action from the options menu at the recordset level of a subscription (which is "active"). In such a case, the system displays a pop up screen which shows only the selected subscription and check box for keeping the credits locked with the value 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.

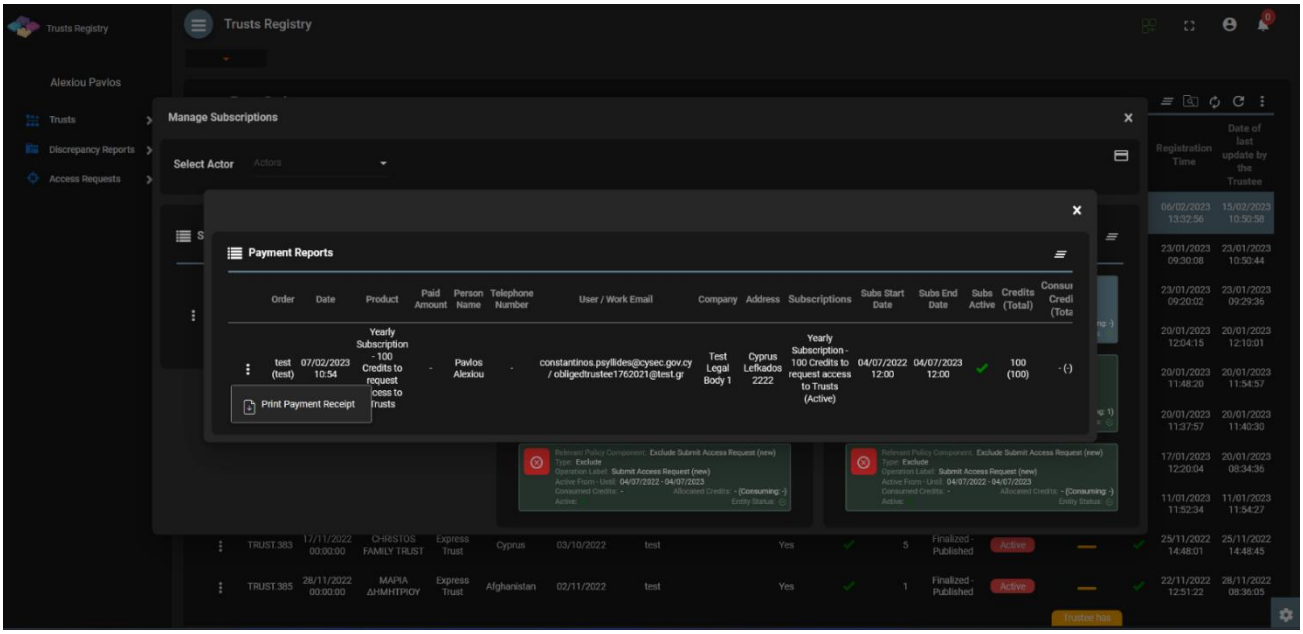
To deactivate a subscription, the user must select the Deactivate action from the options menu at the recordset level of a subscription (which is marked as active (entity status)). In such a case, the system changes the marking to "inactive".

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) credtis of an existing subscription to a new one. It is not provided as a function in the case of ECC

Actual 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.

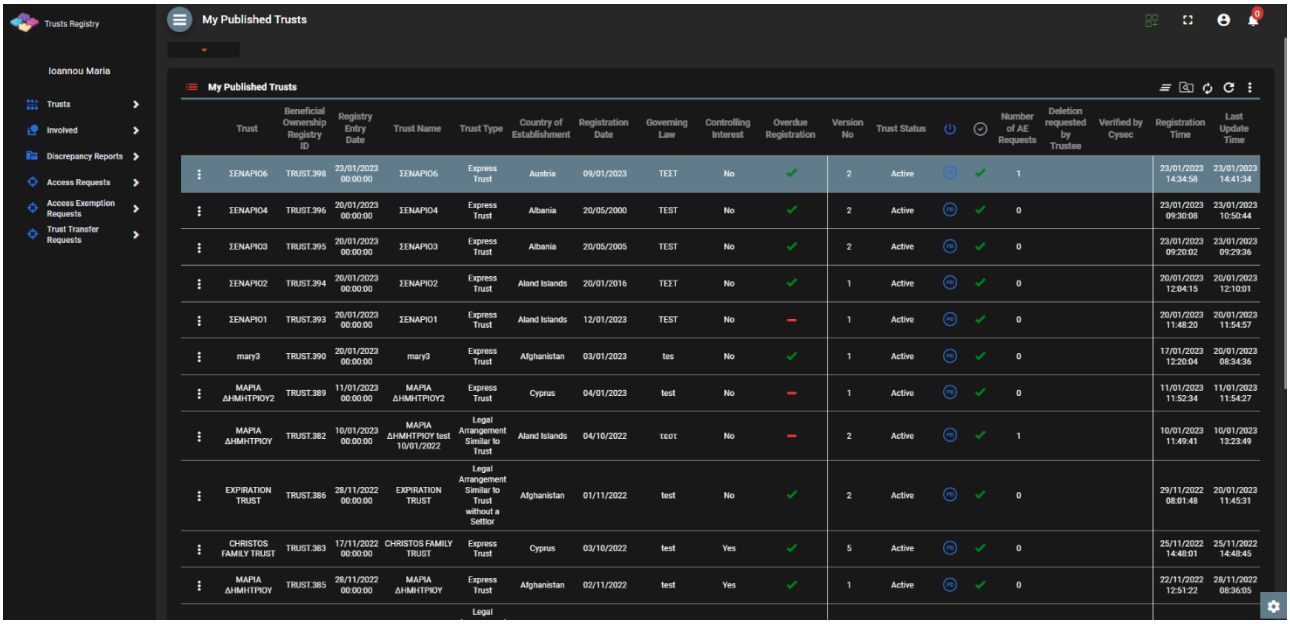
3. Access by 'Trustee of express trusts or Persons holding equivalent positions in similar legal arrangements', in accordance with the provisions of Article 61C (5) (b) (i), (ii) of the AML / CFT Law

3.1. Menus

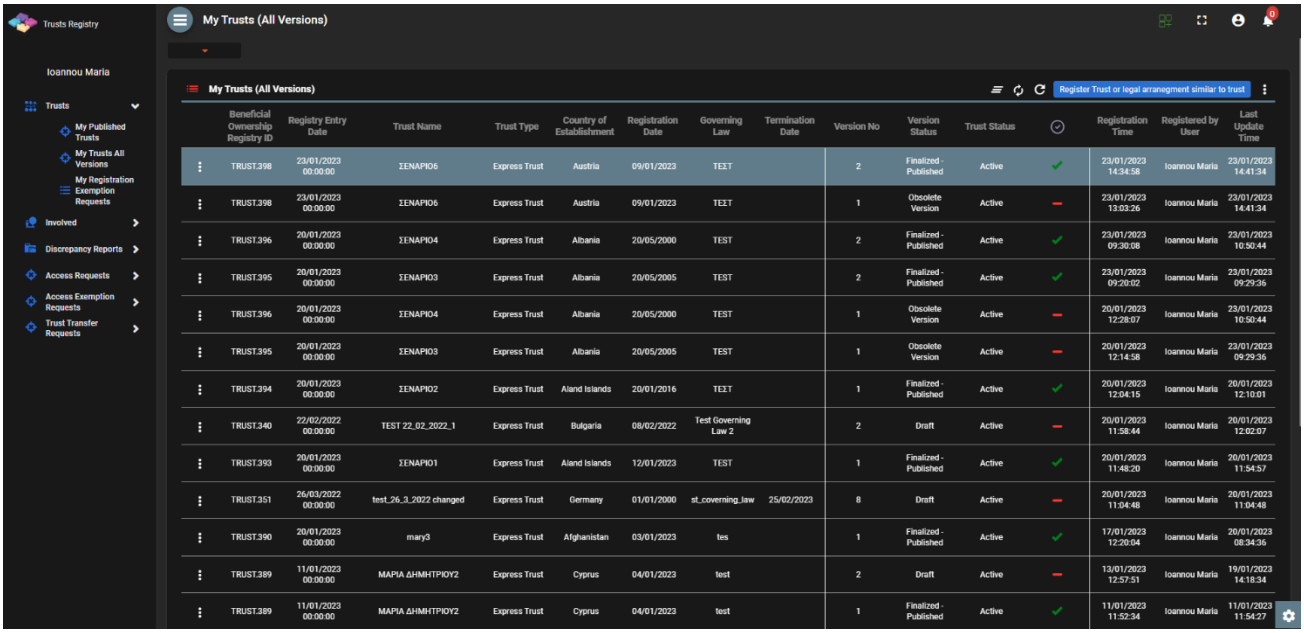
Upon entering the application, the user has access to the following data menus (menu on the left):

Menu	Description
My Published Trusts	The specific list presents the latest versions of the active Trusts of the Registry and which have been published by the specific user.
My Trusts - All Versions	The specific list presents all versions of the Trusts of the Registry that have been registered in the database by the specific user
My Registration Exemption Requests	The specific list presents all the Requests for Exemption of Trust from the Register that has been registered / submitted by thespecificuser.
My Natural Persons	The specific list presents the Natural Persons who have been registered in the Register, as Beneficiai Owners of the Trusts of the Register, by the specific user.
My Legal Entities	The specific list presents the Legal Entities that have been registered in the Register, as Beneficial owners of the Trusts of the Register, by the specific user.
My Involved Trusts	The specific list presents the Trusts registered in the database, as Beneficial Owners of the Trusts of the Register, by the specific user
Incoming Discrepancy Reports	The specific list presents the Discrepancy Reports submitted for its Liability Trusts specific user.
Incoming Access Requests	The specific list presents the Trust Access Requests submitted from other users to the Trustee for viewing the Trust which require evaluation by him .
My Access Exemption Requests	The specific list presents the Trust Access Request Requests that have been registered by the specific user.
My Trust Transfer Requests	The specific list presents the Trust Transfer Requests submitted by specific user.

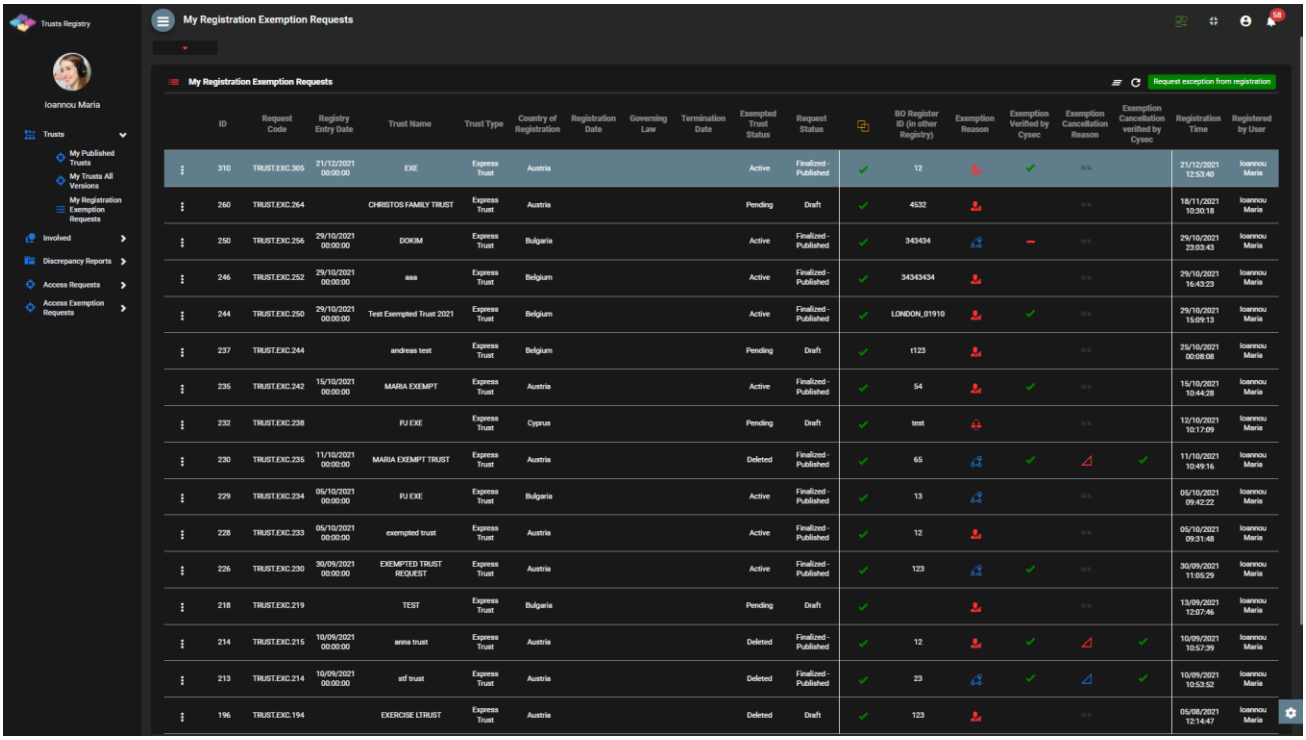
The following are indicative screens of the above menus of the application:



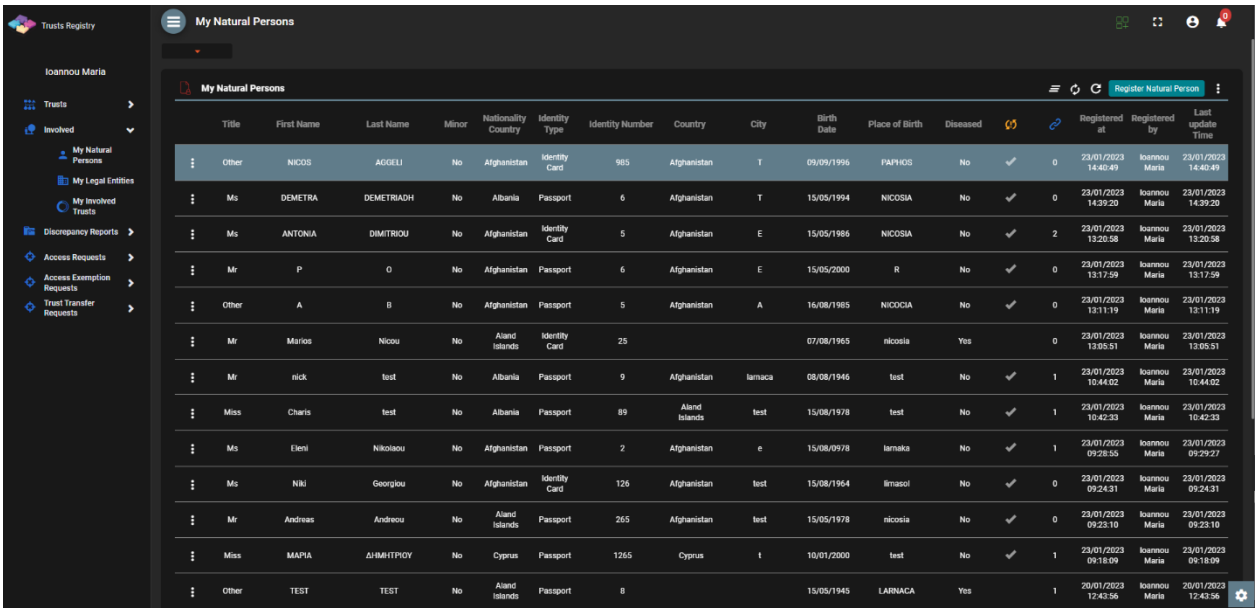
List of My Published Trusts



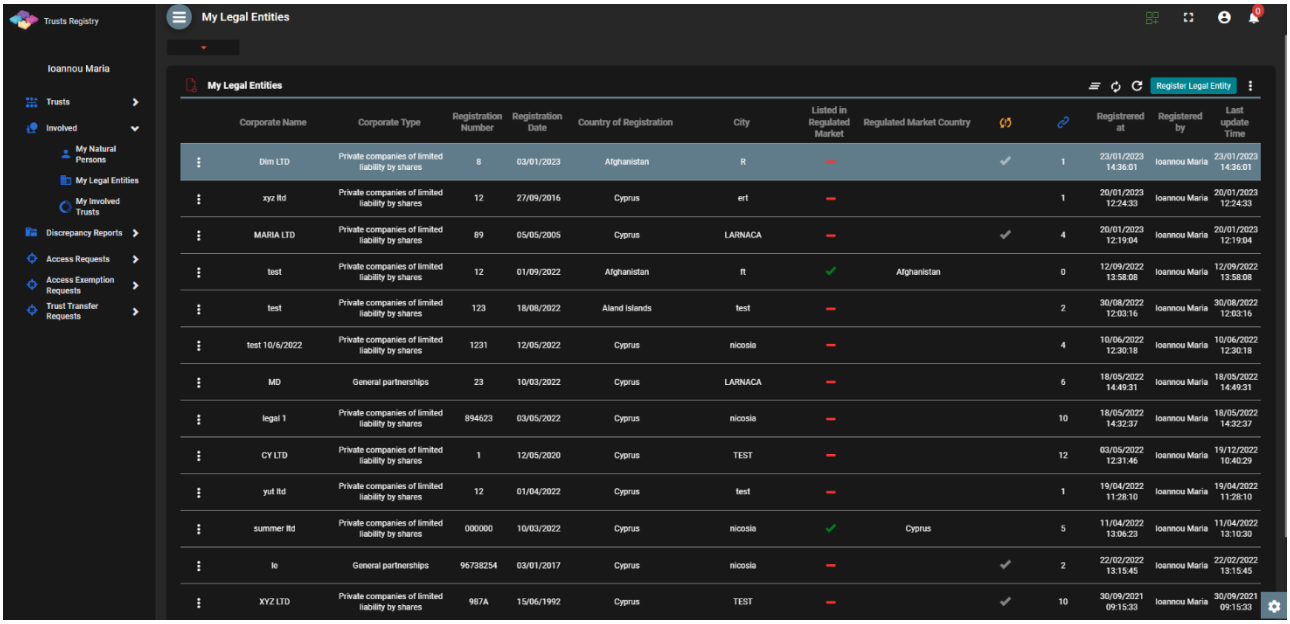
List of Trusts - My Trusts (All Versions)



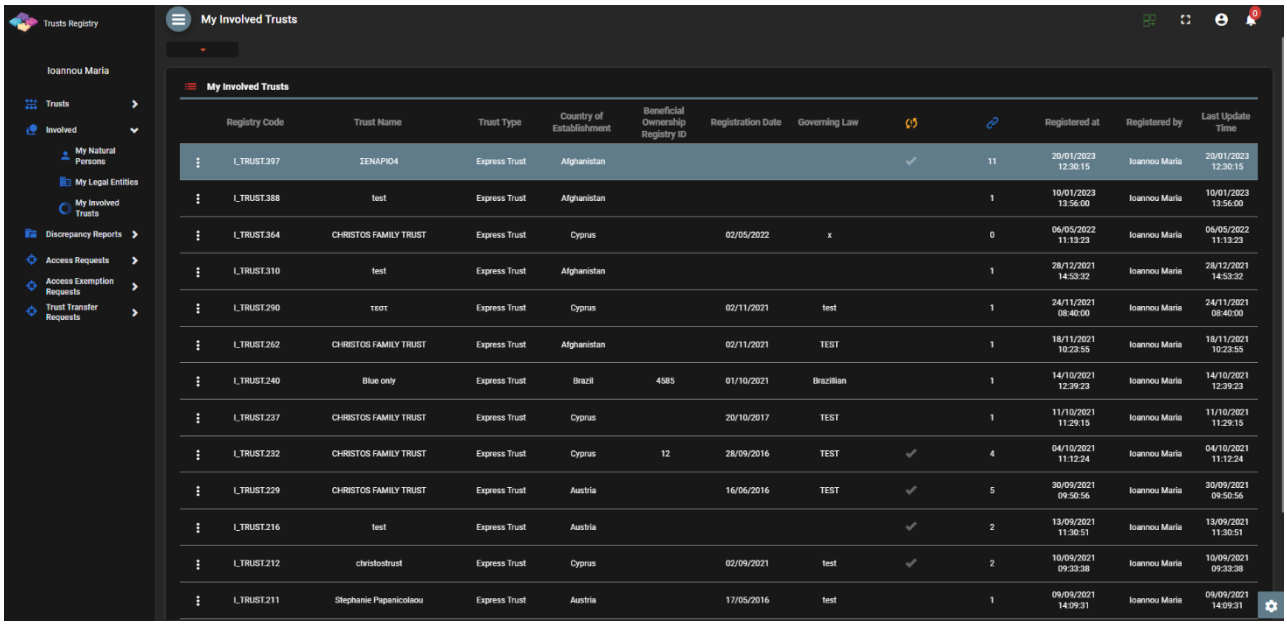
List of Registration Exemption Request from the Register (My Registration Exemption Requests)



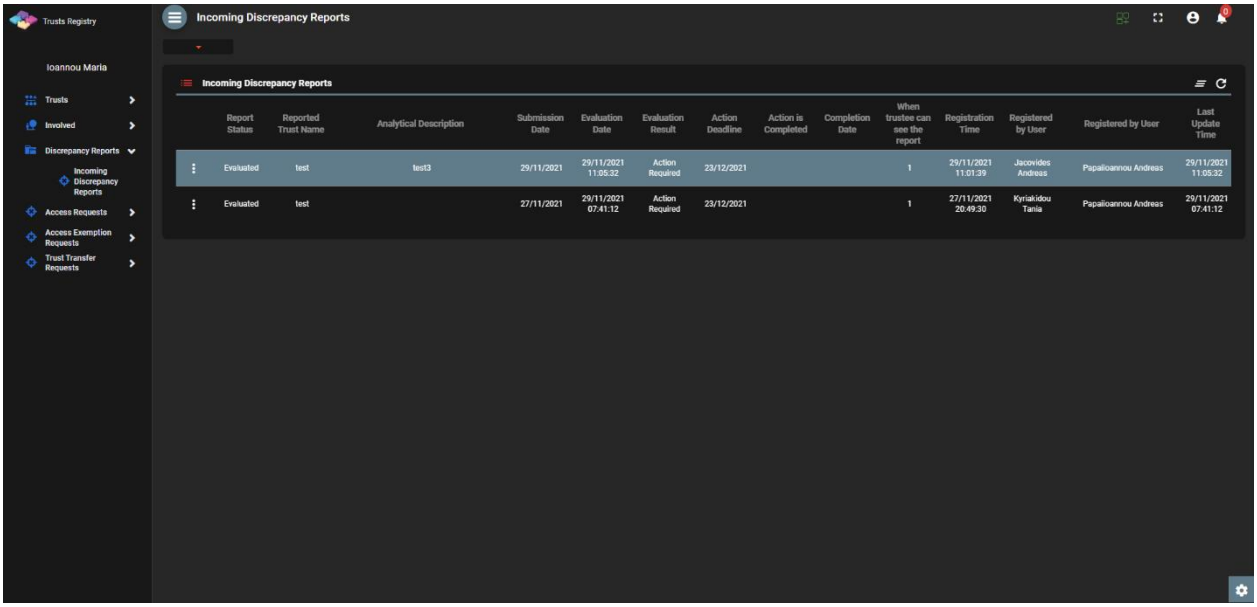
List of My Natural Persons (My Natural Persons)



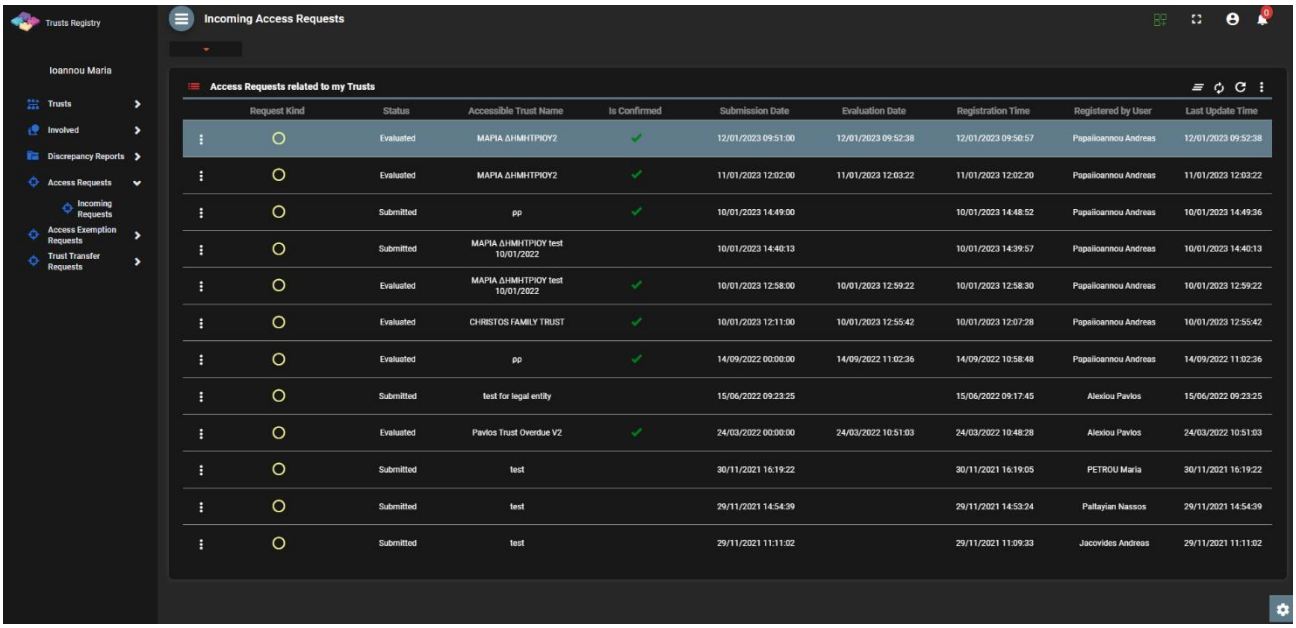
List of my Legal Entities (My Legal Entities)



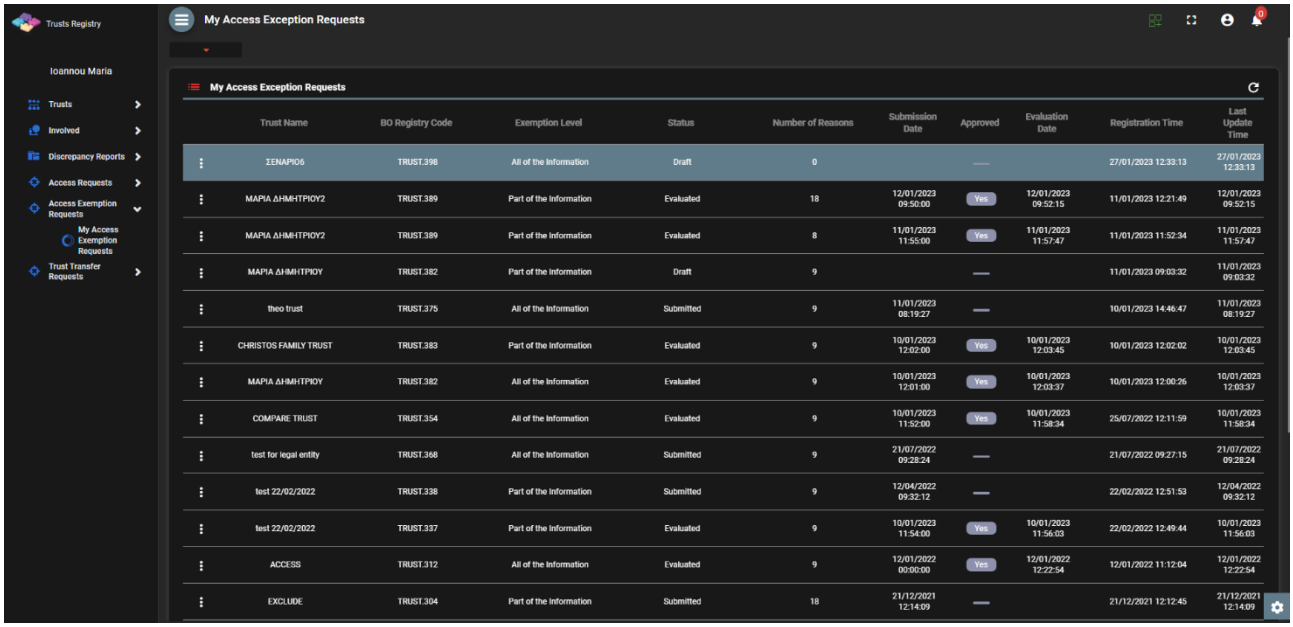
List of My Involved Trusts



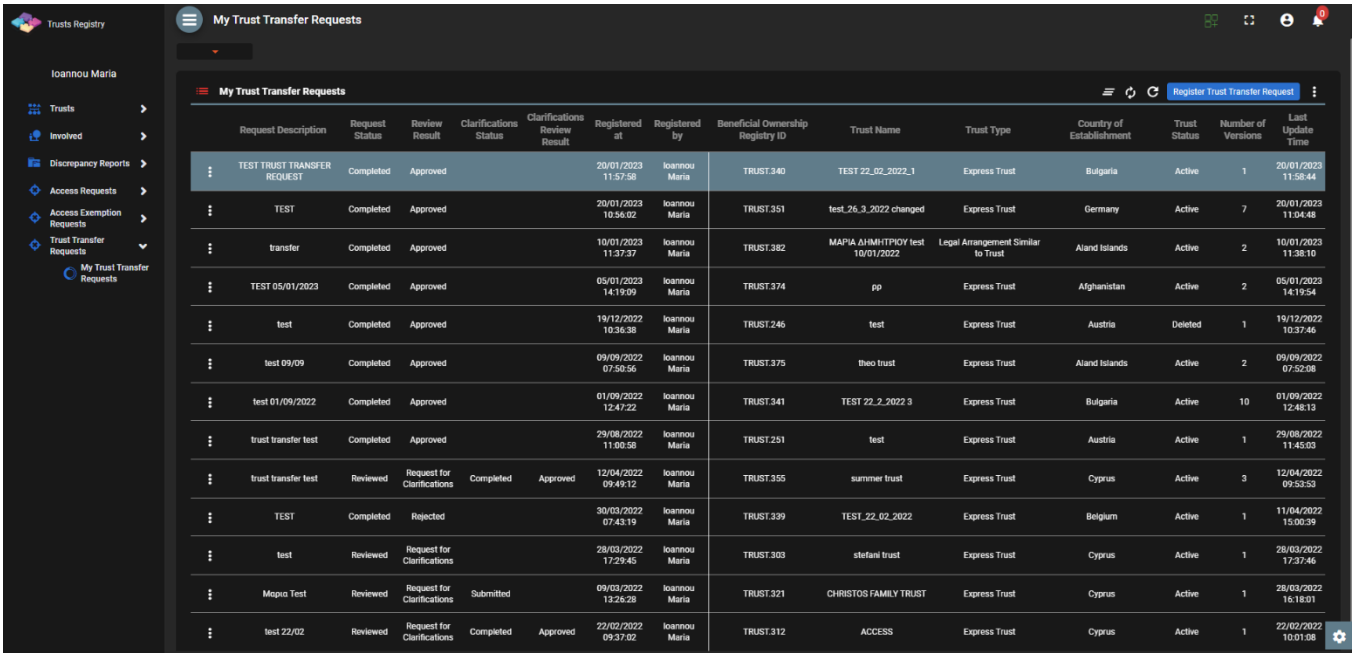
List of Incoming Discrepancy Reports



List of Incoming Access Requests



List of My Access Exemption Requests



List of My Trust Transfer Requests

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

Menu	Mode	Position	Reference
My Published Trusts	Manage Trust (Trust Management)	Recordset	Chapter 3.2.4
	Register Access Exemption Request (Registration of Access Exemption Request) *It is only allowed if there is no other access request request for the specific*	Recordset	Chapter 3.9.1

	Trust which is in Draft or Submitted state.		
	Trust Report (Print the trust)	Recordset	
	Declare Trust as Deleted (Statement of Confidence as Deleted)	Recordset	Chapter 3.2.15
My Trusts - All Versions	Register Trust or Legal arrangement similar to Trust (Registration of Trust or similar Legal Entity)	Header	Chapter 3.2.1
	Register New Trust Version (Creating a new Trust Version) *This feature is allowed only if the selected registration concerns a published issue of an active Trust.*	Recordset	Chapter 3.2.3
	Manage (Trust Management) *This feature is allowed only if the selected entry concerns a Trust that has not been deleted.As long as the selected version is published, no edit / create functions are provided from this screen.*	Recordset	Chapter 3.2.4
	Cancel Latest Draft Version (Cancellation of Draft Versionof Trust) *This feature is allowed only if the selected registration concerns a draft version of a Trust and the Trust is not deleted.*	Recordset	Chapter 3.2.2
My Registration Exemption Requests	Request Exemption from Registration (Registration of a Trust Exemption Application from the Register)	Header	Chapter 3.3.1
	Manage Trust / Request (Trust Exemption Application Management from the Registry) *As long as the selected function is published / submitted, no edit / create functions are provided from this screen.*	Recordset	Chapter 3.3.3
	Delete Request (Deletion of a Trust Exemption functionfrom the Register) This feature is allowed only if the selected registration concerns a draft versionfor Exemption of Trust.	Recordset	Chapter 3.3.2
	Cancel Registration Exemption (Cancellation of Trust Exemption) *This function is allowed only if the selected request has been confirmed by the CySEC(ie it is already excluded from the Register).*	Recordset	Chapter 3.3.8
My Natural Persons	Register Natural Person (Registration of a Natural Person)	Header	Chapter 3.4.1

	View Natural Person (Registration of a Natural Person in view mode)	Recordset	Chapter 3.4.1
	Edit Natural Person (Registration of a Natural Person in edit mode)	Recordset	Chapter 3.4.1
	Beneficial Ownerships (Involvement in Registry Trusts)	Recordset	Chapter 3.4.2
	Ownership & Control in Legal Entities (Participation in Legal Entities)	Recordset	Chapter 3.4.3
My Legal Entities	Register Legal Entity (Registration of a Legal Entity)	Header	Chapter 3.5.1
	View Legal Entity (Registration of a Legal Entity in view mode)	Recordset	Chapter 3.5.1
	Edit Legal Entity (Registration of a Legal Entity in edit mode)	Recordset	Chapter 3.5.1
	Beneficial Ownerships (Involvement in Registry Trusts)	Recordset	Chapter 3.5.2
	Beneficial Owners / Managing Officials (Beneficial Owners / Directors Overview)	Recordset	Chapter 3.5.3
My Involved Trusts	Beneficial Ownerships (Involvement in Registry Trusts)	Recordset	Chapter 3.6.3
Incoming Discrepancy Reports	Review (Discrepancy Report Check) This feature is only allowed if the report is in Evaluated mode.	Recordset	Chapter 3.7.1
	Complete Review (Completion of Discrepancy Reporting Control) This function is allowed only if the report is in Evaluated state and all the required fields of the report control form have been filled in.	Recordset	Chapter 3.7.2
Incoming Access Requests	Review (Trustee Access Request Check) *This function is allowed only if the request is in Submitted state and only if the request is type 3, ie it requires control by the trustee of the Trust for which access is requested..*	Recordset	Chapter 3.8.1
	Complete Review (Completion of Trustee Access Request Review) *This function is allowed only if the report is in Submitted mode and all the required fields of the report review form have been filled in, and only if the request is in Submitted mode and only*	Recordset	Chapter 3.8.2

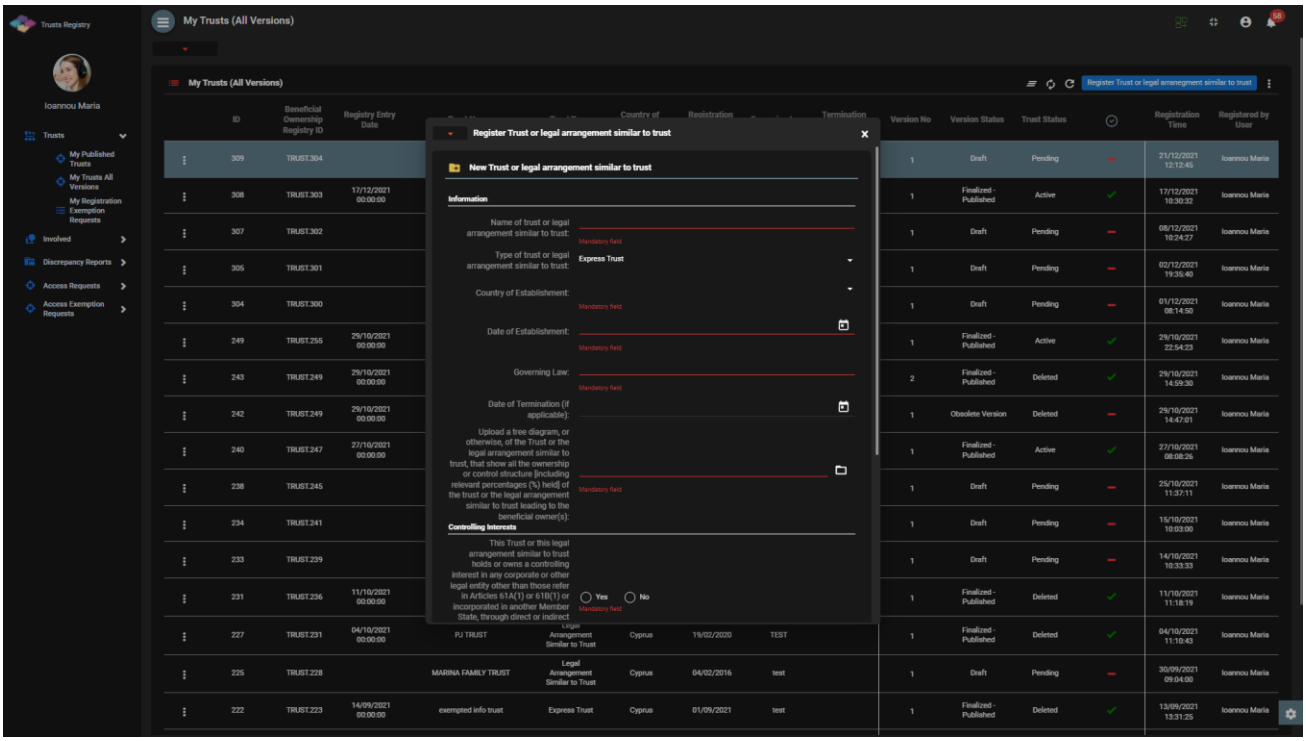
	if the request is type 3, ie requires control by the Trustee of the Trust for which access is requested.		
	Cancel Trust Access (Cancellation of Access to the Trust) *This feature is only allowed if the report is in Evaluated mode and access to the Trust has been approved (type 3 requests only).*	Recordset	Chapter 3.8.3
My Access Exemption Requests	Complete Reasons (Update Reasons for Exclusion) This feature is only allowed if the opt-out request is in Draft mode.	Recordset	Chapter 3.9.2
	Submit (Submit an Exemption Request) *This feature is only allowed if the opt-out request is in Draft mode.*	Recordset	Chapter 3.9.3
My Trust Transfer Requests	Register Trust Transfer Request (Submission of Trust Transfer Request)	Header	Chapter 3.10.1
	Edit (Change of Trust Transfer Request details) *This feature is only allowed if the transfer request is in Draft mode.*	Recordset	Chapter 3.10.2
	Delete (Deletion of Trust Transfer Request) *This feature is only allowed if the transfer request is in Draft mode.*	Recordset	Chapter 3.10.2
	Submit (Submit a Trust Transfer Request) *This feature is only allowed if the transfer request is in Draft mode.*	Recordset	Chapter 3.10.3
	Provide Clarifications (Provide Clarifications on Request for Transfer of Trust) *This function is allowed only if the transfer request is in Reviewed state and the result is Request for Clarifications, and only if the relevant mandatory evaluation fields have been completed.*	Recordset	Chapter 3.10.4
	Submit Clarifications (Submission of Clarifications in a Request for Transfer of Trust) *This function is allowed only if the transfer request is in Reviewed state and the result is Request for Clarifications, and only if the relevant required fields have been filled in..*	Recordset	Chapter 3.10.5

Provided Functions at Trust level per Directory

3.2. Registry Trust Management

3.2.1. Register a Trust or Legal arrangement similar to a Trust

The User selects the "Register Trust or legal arrangement similar to trust" function from the 'My Trusts All Versions' menu. The system opens a pop up screen for entering the basic elements of a Trust or similar legal entity, as shown in the screen below.



Form for Registration of Basic Details of a Trust or similar legal entity

To register a Trust or similar legal entity, the user must complete the following information:

Field Name	Field Type	Shows up	Mandatory	Remarks
Trust Information Section				
Name of trust or legal arrangement similar to trust	Text field	YES	YES	Name of the Trust
Type of trust or legal arrangement similar to trust	Options menu with the following options: a) express trust b) legal arrangement similar to Trust c) Legal Arrangement Similar to Trust without a Settlor	YES	YES	Type
Include the specific type of the legal arrangement similar to Trust	Text field	YES if a "legal arrangement similar to Trust" value is	YES when it appears	

		selected in the previous field		
Note	-	YES if a "legal arrangement similar to Trust" value is selected in the previous field	-	The field displays the word "https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/? uri = CELEX: 52019XC1024 (01) & from = GAWhich is a link
Country of Establishment	Menu of options with the countries of the European Union	YES	YES	Country of residence of the Trust
Date of establishment	Select from Date Picker (or enter date in DD / MM / YYYY format)	YES	YES	Date of Establishment of the Trust
Governing law	Text field	YES	YES	The governing law on Trust
Date of termination (if applicable)	Select from Date Picker (or enter date in DD / MM / YYYY format)	YES	NO	Date of Abolition of the Trust
Upload a tree diagram, or otherwise, of the Trust or the legal arrangement similar to trust, that show all the ownership or control structure [including relevant percentages (%) held] of the trust or the legal arrangement similar to trust leading to the beneficial owner (s)	Select file from disk	YES	YES	
Controlling Interests Section				
This Trust or this legal arrangement similar to trust holds or owns a controlling interest in any corporate or other legal entity other than those referring in Articles 61A (1) or 61B (1) or incorporated in another Member State, through direct or indirect ownership, including through bearer shareholdings, or through control via other means	Check box YES / NO (check box)	YES	YES	
Access Exemption Section				
Exceptional circumstances for an exemption of accessing all or part of the information on the beneficial ownership of the Trust or the legal	Check box YES / NO (check box)	YES	YES (with default the price is NO)	Access Exclusion Request

arrangement similar to the Trust				
Access Exemption Level	Options menu with the following options: a) All of the Information b) Part of the Information	YES if a value is selected in the "Access Exemption" field	YES when it appears	Access Exclusion Level
Submit a signed letter of your request for an exemption to provide access to all or part of the information on the beneficial ownership of the Trust or the legal arrangement similar to the Trust, which include detailed information and best describes your request of the exceptional nature of the circumstances, in order to be evaluated by CySEC according to article 61C (16) of the AML / CFT Law	Select file from disk	YES if a value is selected in the "Access Exemption" field	YES when it appears	Submission of a documentary document
Note	Information field with price «An Access Exemption Request will be created as soon as you register the Trust Information. In the request you will have to define the reasons for the exemption request per case »	YES if the price "YES" is selected in the field "Exceptional circumstances for an exemption of accessing all or part of the information on the beneficial ownership of the Trust or the legal arrangement similar to the Trust"	-	Uneditable by the user Provides information to the user by registering the Trust, creates an Access Exclusion Request, which is accessible from the My Access Exemption Requests list, and for which he must enter the reasons why the user requests an access exemption
We confirm that all measures have been taken to ensure that all information provided herein is adequate, accurate and up to date	Check box YES / NO (check box)	YES	YES Mandatory value YES for the user to be able to SAVE	Confirmation of the correctness and suitability of the registered data

After entering the key details of a Trust or similar Legal Entity, the system presents the Trust management screen, so that the user can enter the additional details of the file per case (see chapter 2.2.4).

When saving a new Trust, the system:

- Saves the Trust in “Pending” mode and assigns it a registration number (TRUST.ID) unique to each Trust
- Creates the first version of the Trust in "Draft" version status with an indication that it is not the latest version (note: the latest version is the one published in the Register, not the draft)
- If Access Exemption is selected, a Draft Exemption Request is generated which is accessible from the My

Access Exemption Reasons directory.

3.2.2. Cancel Latest Draft Version

The draft Version cancellation function is allowed only in case the selected Trust version is in draft status (ie it has not been published). With this function:

- The system deletes the specific version (folder set)
    - In the case of Beneficial Owners, upon deletion, the Legal or Natural Persons or the Trusts with which the Beneficial Owners are affiliated are not deleted.
- If this is the first issue of a Trust, the Trust itself is deleted.

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

3.2.3. Create a New Trust Version (Register New Trust Version)

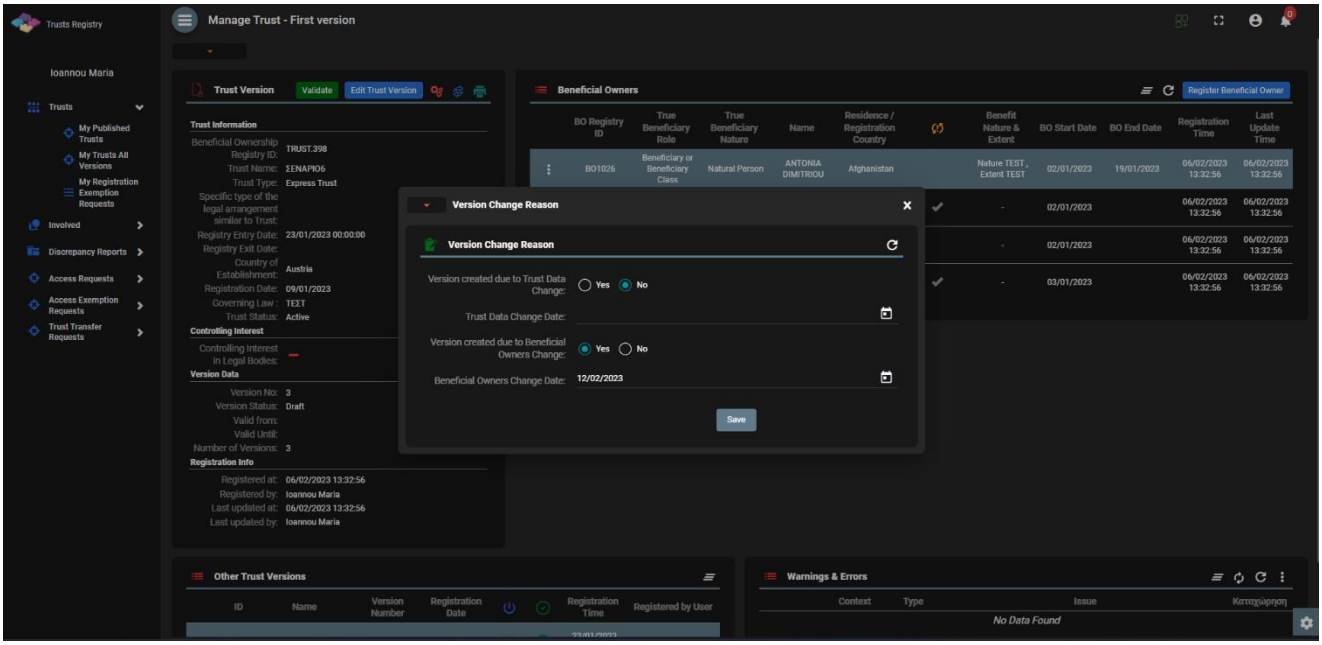
The function of creating a new Trust Issue only in the case that the selected Trust Issue is in "Published" status, ie it has been finalized by the user and has been registered in the Register. With this function the user can update the data he has entered for the selected Trust (by modifying the data of the new version). With this function:

- Copies all the data (folder set) of the current (published) version, and creates a new Version whose data can be modified
    - In the case of Beneficial Owners, the Legal or Natural Persons or Trusts with which the Beneficial Owners are affiliated are not copied, but only the Beneficial Owners.
- The new version is put in draft mode, until it is finalized and published by the user.

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

Please note that after creating a new Trust version, the user can change the type of trust by selecting the symbol from the Trust Version Card header in the Trust Issue Management screen.

Please note that after creating a new Trust version, the user must enter the reason for its creation by selecting the symbol from the Trust Version Card header in the Trust Issue management screen:



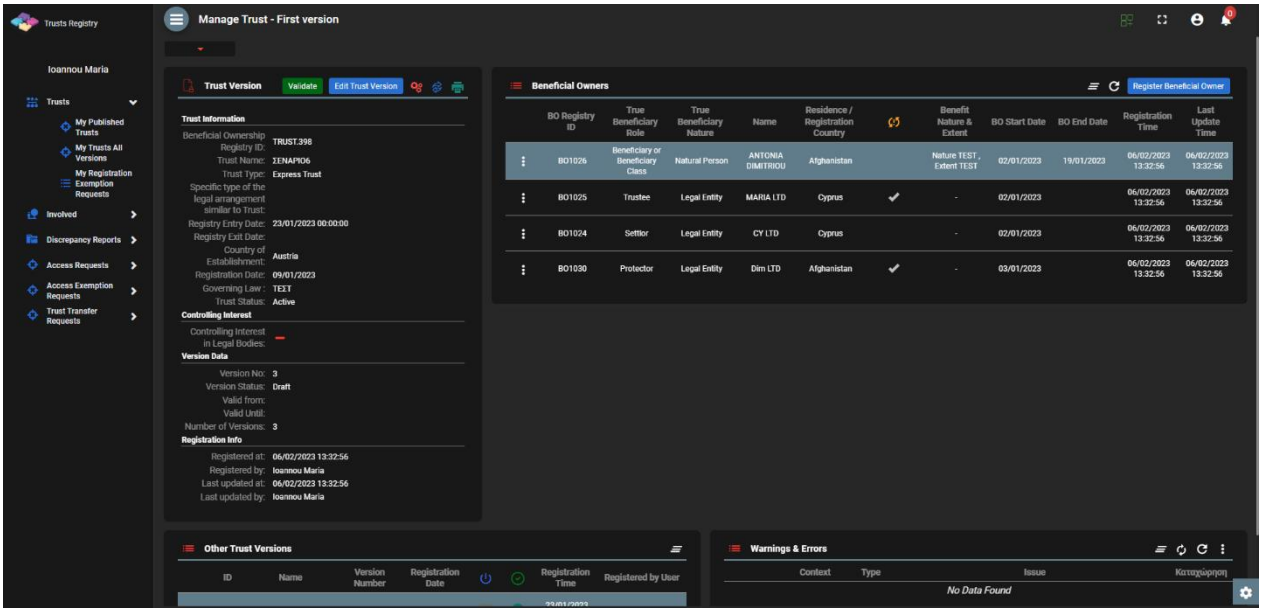
To enter a reason to create a new Version, the user must fill in the following information:

Field Name	Field Type	Shows up	Mandatory	Remarks
Version created due to Trust Data Change	Check box YES / NO (check box)	YES	YES	
Trust Data Change Date	Select from Date Picker (or enter date in DD / MM / YYYY format)	YES	YES If a YES value is selected in the previous field	
Version created due to Beneficial Owners Change	Check box YES / NO (check box)	YES	YES	
Beneficial Owners Change Date	Select from Date Picker (or enter date in DD / MM / YYYY format)	YES	YES If a YES value is selected in the previous field	

The above card and function is also used in case the user wishes to update the reason for creating a new version (edit form).

3.2.4. Manage Trust

This feature presents the user with detailed data concerning the history and individual details of a Trust (Trust file - current version), providing a 360º optical dashboard.



Trust Version Management Screen

Some of the functions provided, especially those related to the registration or updating of data, are provided (displayed or allowed) only if the Trust issue under management is draft (ie not yet published).

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

Card	Mode	Position	Reference
Trust Version	Validate (version control) *This feature is only allowedin case the managed version is in draft state*	Header (text)	Chapter 3.2.5
	Publish Trust (Publication of a Trust Issue) *This feature is only allowedin case the managed version is in draft state, and only after the Validation of the version has been completed (essentially only allowed if the message Warnings & Errors includes a message with a green indication)*	Header (text)	Chapter 3.2.6
	Edit Trust Version (Trust Issuance Update) *Allowed only if the version under management is in draft state*	Header (text)	Chapter 3.2.7
	Issue Proof of Registration (issuance of registration certificate) *This function is allowed only after the publication of the first issue of the Trust*	Header (icon)	Chapter 3.2.8
	Trust Report (εκτύπωση του trust)	Header (icon)	
Beneficial Owners	Register Beneficial Owner (Registration of a Real Beneficiary) *This featureallowed only if the version under management is in draft state*	Header (text)	Chapter 3.2.9
	Edit Beneficial Owner	Recordset	Chapter 3.2.9

	Registration of a Real Beneficiary inedit mode) *This featureallowed only if the version under management is in draft state*		
	View Beneficial Owner Details (Registration of a Real Beneficiaryin view mode)	Recordset	Chapter 3.2.9
	Manage Trust (Trust Management that has been declared as the actual beneficiary of the Register Trust) *This function only if the beneficial owner has been declared a Trust*	Recordset	Chapter 3.2.11
	Edit Natural Person (Registration of a Natural Personin edit mode) *This function is allowedonly if the version under management is in draft condition, and if the Real Beneficiary is a Natural Person*	Recordset	Chapter 3.4.1
	View Natural Person Details (Registration of a Natural Personin view mode) *This function is allowedonly if the Real Beneficiary is a Natural Person*	Recordset	Chapter 3.4.1
	Edit Legal Entity (Registration of a Legal Entityin edit mode) This function is allowedonly if the version under management is in draft condition, and if the Real Beneficiary is a Legal Entity	Recordset	Chapter 3.5.1
	View Legal Entity Details (Registration of a Legal Entityin view mode) *This function is allowedonly if the Real Beneficiary is a Legal Entity*	Recordset	Chapter 3.5.1
	View Beneficial Owners/ Senior Managing Officials (Overview of Beneficiaries / Directors of Legal Entities) *This function is allowedonly if the Real Beneficiary is a Legal Entity*	Recordset	Chapter 3.5.3
Other Trust Versions	Manage Trust Version (Trust Management)	Recordset	Chapter 3.2.4
Warnings & Errors	No functions provided		

3.2.5. Validate Issue Check

This function checks the correctness and completeness of the data of a Trust contained in a draft version of it (complete file). When activating this function, the system:

- Deletes the results of any previous test
- Performs the checks described in the table below
- Displays the test results at the bottom right of the screen (system notification)
- Saves and displays the test results (warnings & errors) on the Warnings & Errors card of the Trust Management screen.

The above function is allowed only if the selected Trust version is in "Draft" mode.

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

The following checks are performed when the function is activated:

Category / Control	Message Type	Control Level	Remarks
General Audits			
Check if it is a Draft Version	Error	Trust Version	Although the system does not allow this function in case the version is not draft, this control has also been integrated
Check if there is more than one Draft Edition for this Trust	Error	Trust Version	This check has been included in the event of a data error
Check if all the required information has been entered in the main Trust registration screen	Error	Trust Version	Although the system does not allow the user to save / create a Trust if all the required information has not been completed, this control is also integrated
Check whether a reason for creating a new version has been registered (this check is not performed for the 1st edition of the Trust)	Error	Trust Version	See chapter 3.11
Specialized Checks for Trust			
Check if at least one Settlor has been registered	Error	Beneficial Owners	
Check if at least one Trustee has been registered	Error	Beneficial Owners	
Check if at least one Beneficiary has been registered	Error	Beneficial Owners	
Check if all Natural Persons of an active Beneficial Owner have valid identification documents	Error	Beneficial Owners	
For each Beneficial Owner who is a Legal Entity			
Check whether at least one Natural Person has been registered on the Legal Entity representing the Beneficial Owner	Error	Legal Entities Beneficial Owners	
For every Beneficial Owner who is a Trust			
Check if at least one Individual has been registered on the Trust representing the Beneficial Owner	Error	Trust Beneficial Owners	

3.2.6. Publish

This function concerns the publication of a (Draft) Version in the Register, by the appropriately authorized user. When activating this function:

- The system initially performs the "Trust Issuance Check" function

- In case the control is successful (ie includes only warnings), the system changes the status of the issue to "Published", and accordingly now appears in the corresponding directories.
    - The version now becomes the last of the Trust (latest)
    - The previous version is marked as older (latest = false).

The above operation is allowed only if the selected Trust version is in "Draft" mode, and only if the validation (Validation) has resulted in a message with a green version (ie there are no errors).

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

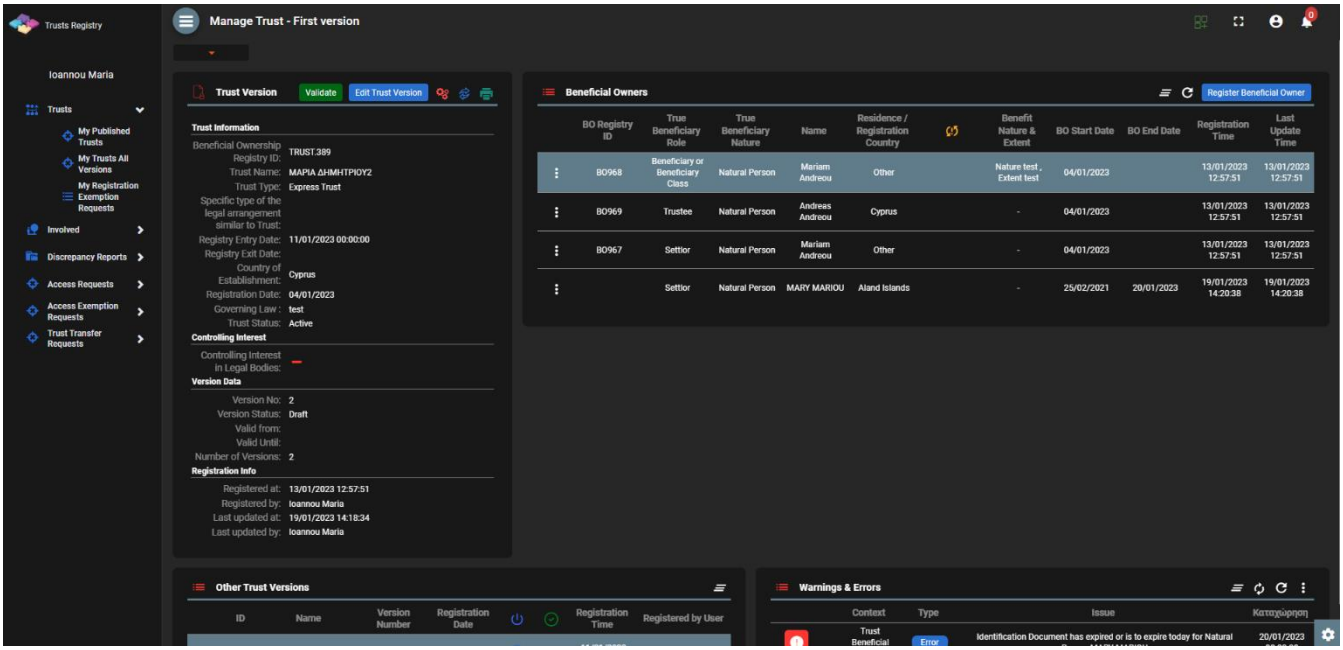
The publication of a Trust in the Register is a function that consumes Credits in the relevant Subscription, but only for the first issue of the Trust.

3.2.7. Edit Trust Version

The operation is similar to that described in the "Entry of Trust" Chapter, but the form opens in edit mode. Through the form, the user can modify the following elements:

Field Name	Field Type	Shows up	Mandatory	Remarks
Beneficial Owner Register ID	-	YES	-	
Version Code	Text field	YES	YES	The version code can be modified by the user (note: does not apply to the Trust code, ie the Registration number, which can not be changed by the user)
Trust Name	Text field	YES	YES	Name of the Trust
Country of Establishment	Menu of options with the countries of the European Union	YES	YES	Country of residence of the Trust
Date of establishment	Select from Date Picker (or enter date in DD / MM / YYYY format)	YES	NO	Date of Establishment of the Trust
Governing Law	Text field	YES	NO	The governing law on the basis of which the Trust was established and operates
Date of termination (if applicable)	Select from Date Picker (or enter date in DD / MM / YYYY format)	YES	NO	Date of Abolition of the Trust
Ownership & Control Diagram	Select file from disk	YES	YES	The user can attach another file from the one registered in the registration form of the Trust or from the one registered for the previous version
This Trust or this legal arrangement similar to trust holds or owns a controlling interest in any corporate or other legal entity other than	Check box YES / NO (check box)	YES	YES	

those referring in Articles 61A (1) or 61B (1) or incorporated in another Member State, through direct or indirect ownership, including through bearer shareholdings, or through control via other means				

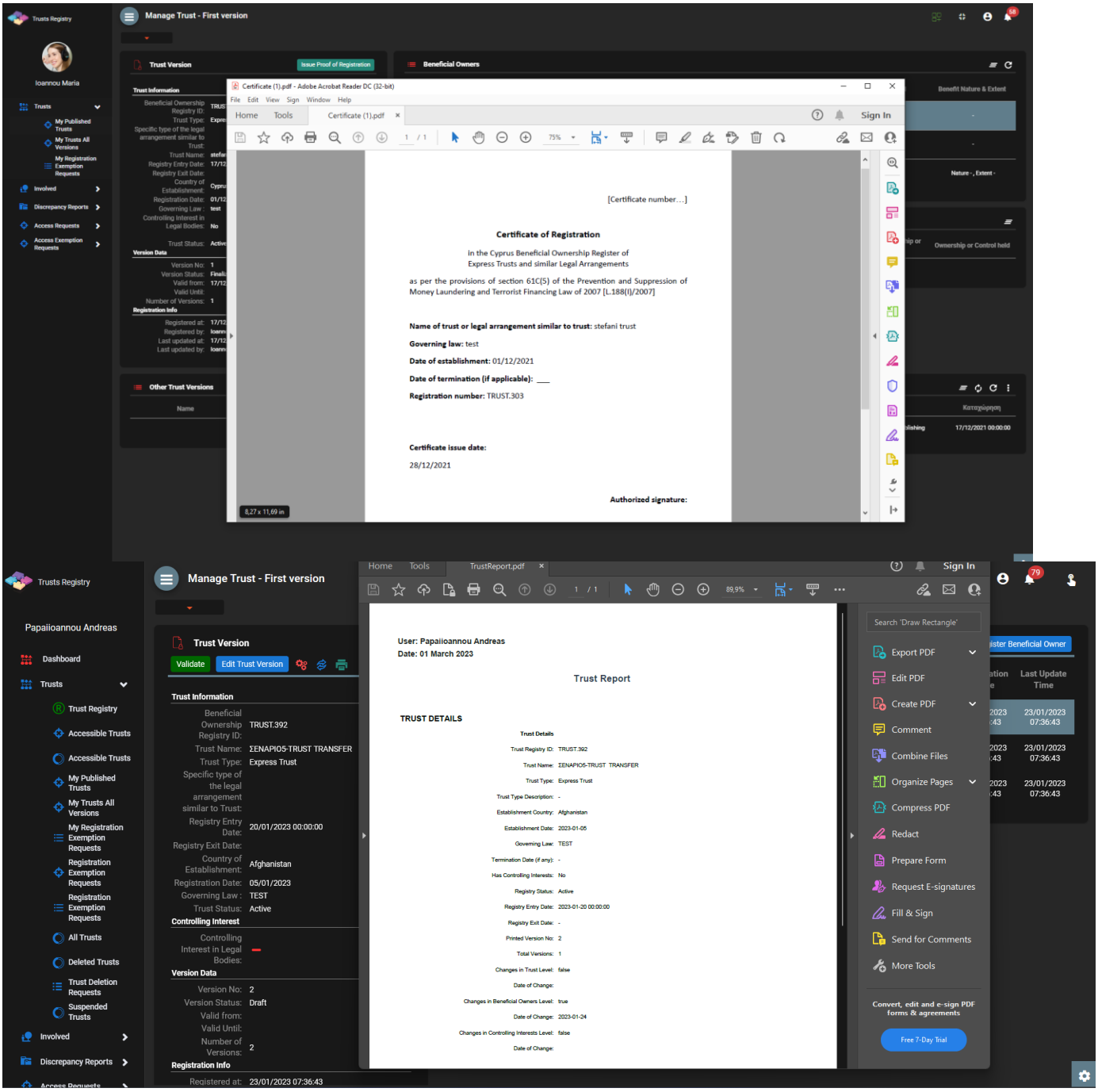


Confidence Information Update (Issue) Screen

3.2.8. Issue Proof of Registration

This function aims to generate a report based on a specific template which has pre-filled (with information from the Registry) specific data (such as the Registration Number of the Trust, the date of creation, etc.). The Certificate is produced in .pdf format, and is used by the Trustees as proof of entry of a Trust in the Register.

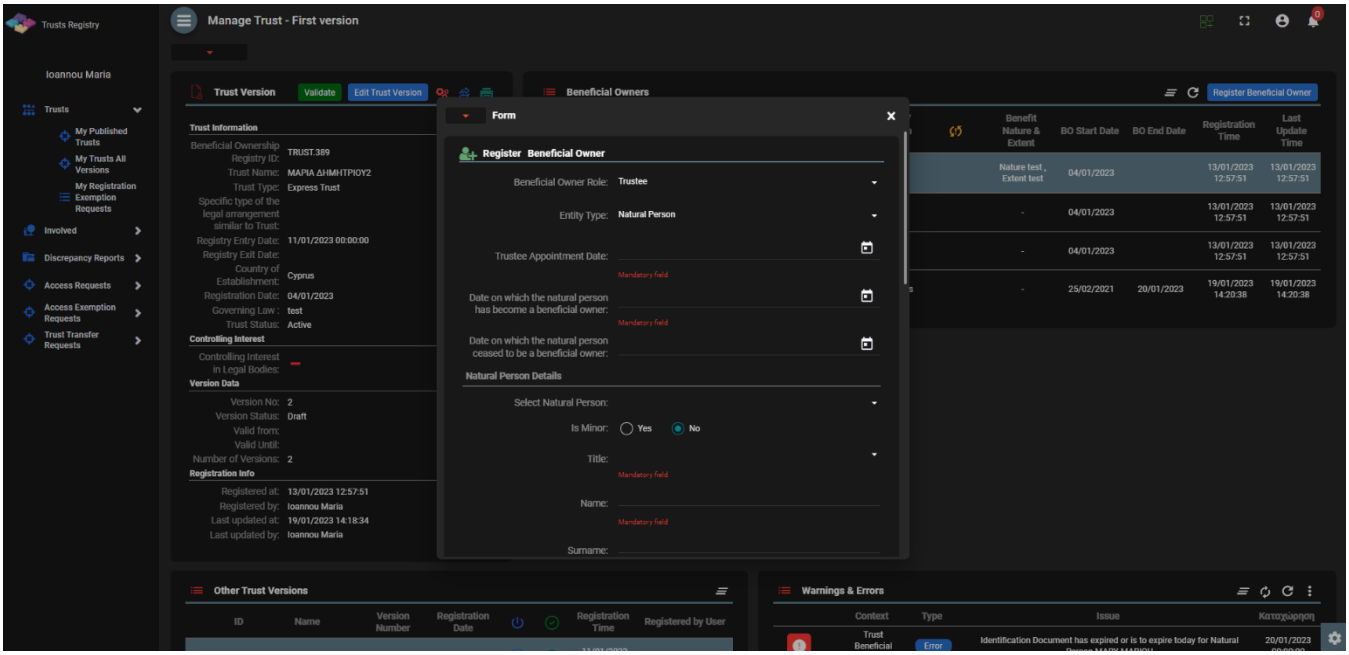
Operation is running in the background and has no screen (generates file)



Issuance of a Certificate of Trust Registration

3.2.9. Register Beneficial Owner

This function is intended to record the details of a True Beneficiary of a Trust.



Real Beneficiary Registration Popup Screen

To register a beneficial owner, the user must fill in the following information:

Field Name	Field Type	Shows up	Mandatory	Remarks
Beneficial Owner Role	Options field with the following options: a) Settlor b) Trustee c) Protector d) Beneficiary - Beneficiary Class e) Any Other natural person exercising ultimate control	YES (with default value "Settlor")	YES	Role Selection in the Trust
Beneficiary Type	Options field with the following options: a) Determined b) Not Determined c) Both	YES if a "Beneficiary" value is selected in the previous field	YES when it appears	Beneficiary Type Selection If the value "Determined" or "Both" is selected, the user must then enter the details of the Natural Person (only Natural Person can be selected in the next field)
Entity Type	Options field with the following options: a) Natural Person b) Legal Entity c) Trust (or other legal arrangement)	YES (field is hidden if "Not Determined" value is selected in the Beneficiary Type field) (with default value "Natural Person" when displayed)	YES when it appears	If "Beneficiary" is selected in the "Beneficial Owner Role" field, only the Natural Person option is provided (if the field is displayed)

Trustee Appointment Date	Select from Date Picker (or enter date in DD / MM / YYYY format)	YES if "Trustee" value is selected in the role	YES when it appears	
Date on which the natural person[3]has become a beneficial owner	Select from Date Picker (or enter date in DD / MM / YYYY format)	YES	YES	
Date on which the natural person[4]ceased to be a beneficial owner	Select from Date Picker (or enter date in DD / MM / YYYY format)	YES	NO	In this case the system does not check for invalid identification documents
Natural Person Details Section		YES if the value "Natural Person" has been selected in the Entity Type field (applies to all Section fields)		
Select Natural Person	Menu of options with Natural Persons registered by the user	YES	NO	The user can select one of the Individuals registered in the system (or re-register an Individual). Note:In the case of selecting a Natural Person from the database, the following fields related to the Natural Person are filled in automatically, and appear locked. The user can deselect the Individual he has selected by selecting the "Clear" value from the options menu, or change his choice
Is Minor	Check box YES / NO (check box)	YES (with default value NO)	YES	Indicates whether the natural person is a minor
Guardian	Sub form of registration of a Natural Person as a Guardian	YES if YES is selected in the Is Minor field	YES if it appears	See Individual Registration Form (section 4.6.1)
Title	Options menu with the following values: a) Mr b) Ms c) Miss d) Other	YES	YES as long as it does not appear locked	The field is locked if a YES value is selected in the "Is Minor" field
Name	Text field	YES	YES	Name
Surname	Text field	YES	YES	Last name
Father name	Text field	YES	YES	Father's name

[3]The vocabulary changes depending on the entity type that has been declared

[4]The vocabulary changes depending on the entity type that has been declared

Date of birth	Select from Date Picker (or enter date in DD / MM / YYYY format)	YES	YES	Date of birth
Place of birth	Text field	YES	YES	Place of birth
Nationality	Menu of options with the nationalities (countries) of the base	YES	YES	Nationality
Second Nationality	Menu of options with the nationalities (countries) of the base	YES	OXI	Secondary Nationality The field is locked if Nationality is not selected
Type of identification document	Options menu with the following options: a) Identity Card b) Passport c) Birth Certificate	YES	YES	Identification Document Type If the Natural Person has been selected as a minor, only the "Birth Certificate" option is provided (also displayed by default) In another case, if Cypriot Nationality (or Cypriot Secondary Nationality) is selected, only the "Identity Card Certificate" option is provided (also displayed by default), while for all other nationalities "Identity Card" and "Passport" options are provided.
Official identification number	Text Field	YES	YES	The Identification Document number declared in the previous field
Country of issue of document	Menu of options with the countries of the base	YES	YES	Country of issue of the identification document selected above
Date of issue of the document	Select from Date Picker (or enter date in DD / MM / YYYY format)	YES	YES	Document Issue Date
Date of expiration of the document	Select from Date Picker (or enter date in DD / MM / YYYY format)	YES	YES	Document Expiry Date
Diseased	Check box YES / NO (check box)	YES (with default value NO)	YES	Indicates whether the Natural Person has died Also, in this case the system does not check for invalid identification documents
Year of death	Text Field (allows only registration of a four-digit number (format YYYY) with lower in	YES if YES value is selected in the previous field	NO	Year of death

	1800 and higher in the current year)			
Residential Address (Sub Section)		YES if NO value has been selected in the previous field (applies to all fields of the Sub Section)		
Country	Menu of options with the countries of the base	YES	YES	Country of Residence
City	Text Field (only letters are allowed)	YES	YES	Residence City
Post code	Text Field (only letters and numbers are allowed - no special characters)	YES	YES	Housing Postal Code
Address	Text Field (only letters and numbers are allowed - no special characters)	YES	YES	Address (street - area)
Number	Text Field (only letters and numbers are allowed - no special characters)	YES	YES	Number (street)
Legal Entity Details Section		YES if "Legal Entity" value is selected in the Entity Type field (applies to all Section fields)		
Select Legal Entity	Menu of options with the Legal Entities registered by the user	YES	NO	The user can select one of the Legal Entities registered in the system (or re-register a Legal Entity). Note:In the case of selecting a Legal Entity from the database, the following fields related to the Legal Entity are filled in automatically, and appear locked. The user can deselect the Legal Entity he has selected by selecting the "Clear" value from the options menu, or change his choice
Name	Text field	YES	YES	Name
Type of Legal Entity	Options Menu with the following values: a) Private companies of limited liability by shares	YES	YES	Type of Legal Entity

	b) General partnerships c) Societies d) Overseas companies e) Limited partnerships f) Public companies of limited liability by shares g) Public and private companies of limited liability by guarantee without share capital h) Private companies of limited liability by guarantee with share capital i) European companies (SE) j) Public companies of limited liability by guarantee with share capital k) Federations and associations l) Other			
Describe Type	Text field	YES if the value "Other" has been selected in the previous field	YES if it appears	Press Description
Registration number	Text field	YES	YES	Company Registration Number
Country of registration	Menu of options with the countries of the base	YES	YES	Country of Registration
Date of Registration	Select from Date Picker (or enter date in DD / MM / YYYY format)	YES	YES	Registration date
Registered Address Info (Sub Section)				
Country	Menu of options with the countries of the base	YES	YES	Country of Headquarters
City	Text Field (only letters are allowed)	YES	YES	Headquarters City
Post code	Text Field (only letters and numbers are allowed	YES	YES	Postcode of Headquarters

	- no special characters)			
Address	Text Field (only letters and numbers are allowed - no special characters)	YES	YES	Address (street - area)
Number	Text Field (only letters and numbers are allowed - no special characters)	YES	YES	Number (street)
Ownership (Sub Section)				
The legal entity is a company listed on a regulated market that is subject to disclosure requirements consistent with Union law or subject to equivalent international standards which ensure adequate transparency of ownership information	Check box YES / NO (check box)	YES (with default value NO)	YES	Indicates whether the Legal Entity is registered in a regulated market
Note	Information message «You will later have to complete natural person (s) that owns or controls more than 25% plus one share of the entity or through control via other means»	YES if the previous field has a value of NO	-	Message that the user should register the natural persons who have or control the Legal Entity
Note	Information message "If there is no natural person that owns or controls more than 25% plus one share of the entity or through control via other means is identified, or if there is any doubt that the person (s) identified are the beneficial owner (s), you will have to complete the natural person (s) who hold the position of senior managing official (s) "	YES if the previous field has a value of NO	-	Message that the user should register the natural persons who run the Legal Entity
Name of the Regulated market	Text field	YES if a YES value is selected in the first field of the section	YES if it appears	Regulated Market Name
Country of the Regulated market	Menu of options with the countries of the base	YES if the previous field is displayed	YES if it appears	Country of Regulated Market

Trust Details Section		YES if "Trust" value is selected in the Entity Type field (applies to all Section fields)		
Name of trust or legal arrangement similar to trust	Text field	YES	YES	
Type of trust or legal arrangement similar to trust	Options menu with the following options: a) express trust b) legal arrangement similar to Trust	YES	YES	
Note	Update message «https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52019XC1024(01)&from=GA»	YES if the value (b) is selected in the previous field	-	
Include the specific type of the legal arrangement similar to Trust	Text field	NAI if the value (a) is selected in the previous field	YES when it appears	
Country of Establishment	Menu of options with the countries of the base	YES	YES	
Date of establishment	Select from Date Picker (or enter date in DD / MM / YYYY format)	YES	NO	Date of Establishment of the Trust
Governing law	Text field	YES	NO	The governing law for the Trust
Is the trust or legal arrangement similar to trust registered in a registry of trusts in the EE	Check box YES / NO (check box)	YES with default value NO	YES	
Country of Registration	Menu of options with the countries of the European Union	YES if the field "Is the trust or legal arrangement similar to trust registered in a registry of trusts in the EE" has a price YES	YES if it appears	
Beneficial Ownership Register ID	Text field	YES if the field "Is the trust or legal arrangement similar to trust registered in a registry of trusts in the EE" has a price YES	YES if it appears	
Proof of Registration	Select file from disk	YES if the field "Is the trust or legal arrangement similar to trust	YES if it appears	

		registered in a registry of trusts in the EE" has a price YES		
Note	Information message «You will later have to register any natural person (s) who ultimately owns or controls the trust or legal arrangement similar to trust, and holds the position of the settlor (s), trustee (s), protector (if any) , beneficiary and any other natural person exercising ultimate control (if any) »	YES if the field "Is the trust or legal arrangement similar to trust registered in a registry of trusts in the EE" has a price YES	-	Message that the user should register natural persons who own or control the Trust
Note	Information message "Nature of ownership or control held: ie Shares, Voting right, Other ownership interests (ie bearer shares, Control via other means which may, inter alia, include the criteria of control used for the purpose of preparing consolidated financial statements, such as shareholders' agreement, the exercise of dominant influence or the power to appoint senior management) "	YES if the field "Is the trust or legal arrangement similar to trust registered in a registry of trusts in the EE" has a price YES	-	Explanatory Message
Trustee Section	YES if "Trustee" value has been selected in the Beneficial Owner Role field and a country outside the European Union in the Country field concerning the Residential Address of the Natural Person or the Registered Address of the Legal Entity or the Country of Establishment of the Trust (valid for all its fields Section)			
The trustee of the trust or the person holding an equivalent position in a similar legal arrangement enters into a business relationship in the name of the trust or similar legal arrangement in the Republic of Cyprus	Check box YES / NO (check box)	YES with default value NO	YES if displayed	Declares whether the Trustee of the Trust is in a Business Relationship on behalf of the Trust in the Republic of Cyprus
Date of establishment of the business relationship	Select from Date Picker (or enter date in DD / MM / YYYY format)	YES if a YES value has been selected in the previous field	YES if it appears	Date of Starting a Business Relationship
Name of the person (legal or natural) with whom the	Text Field	YES if the previous field is displayed	YES if it appears	Name of Legal Entity or Name of Natural Person

business relationship is established)				with which the Business Relationship is established
Customer's Services Agreement with the terms and conditions of the business relationship)	Select file from disk	YES if the previous field is displayed	YES if it appears	Business Relationship Agreement
The trustee of the trust or the person holding an equivalent position in a similar legal arrangement acquires real estate in the name of the trust or similar legal arrangement in the Republic of Cyprus	Check box YES / NO (check box)	YES with default value NO	YES if it appears	Indicates whether the Trustee of the Trust has acquired real estate in the Republic of Cyprus
Date of acquisition of real estate in the Republic of Cyprus	Select from Date Picker (or enter date in DD / MM / YYYY format)	YES if a YES value has been selected in the previous field	YES if it appears	
Real estate registration number in the Cyprus Department of Lands and Surveys	Text field	YES if the previous field is displayed	YES if it appears	Real Estate Registration Number
Upload property title deed	Select file from disk	YES if the previous field is displayed	YES if it appears	Real Estate Acquisition Contract
Real Estate Address (Sub Section)				
City	Text Field (only letters are allowed)	YES	YES	Property City
Post code	Text Field (only letters and numbers are allowed - no special characters)	YES	YES	Property Address Postal Code
Address	Text Field (only letters and numbers are allowed - no special characters)	YES	YES	Address (street - area)
Number	Text Field (only letters and numbers are allowed - no special characters)	YES	YES	Number (street)
Beneficiary Classes Section	YES if "Beneficiary" value is selected in the Beneficial Owner Role field and "Not Determined" or "Both" value in the Beneficiary Type field (valid for all Section fields)			
Description of Beneficiary Class (1)	Text field	YES	YES	Description Beneficiary Class
Nature of the benefit (1)	Text field	YES	YES if a value is entered in the previous field	

Extend of the benefit (1)	Text field	YES	YES if a value is entered in the previous field	
Description of Beneficiary Class (2)	Text field	YES	NO	Description Beneficiary Class
Nature of the benefit (2)	Text field	YES	YES if a value is entered in the previous field	
Extend of the benefit (2)	Text field	YES	YES if a value is entered in the previous field	
Description of Beneficiary Class (3)	Text field	YES	NO	Description Beneficiary Class
Nature of the benefit (3)	Text field	YES	YES if a value is entered in the previous field	
Extend of the benefit (3)	Text field	YES	YES if a value is entered in the previous field	
Description of Beneficiary Class (4)	Text field	YES	NO	Description Beneficiary Class
Nature of the benefit (4)	Text field	YES	YES if a value is entered in the previous field	
Extend of the benefit (4)	Text field	YES	YES if a value is entered in the previous field	

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

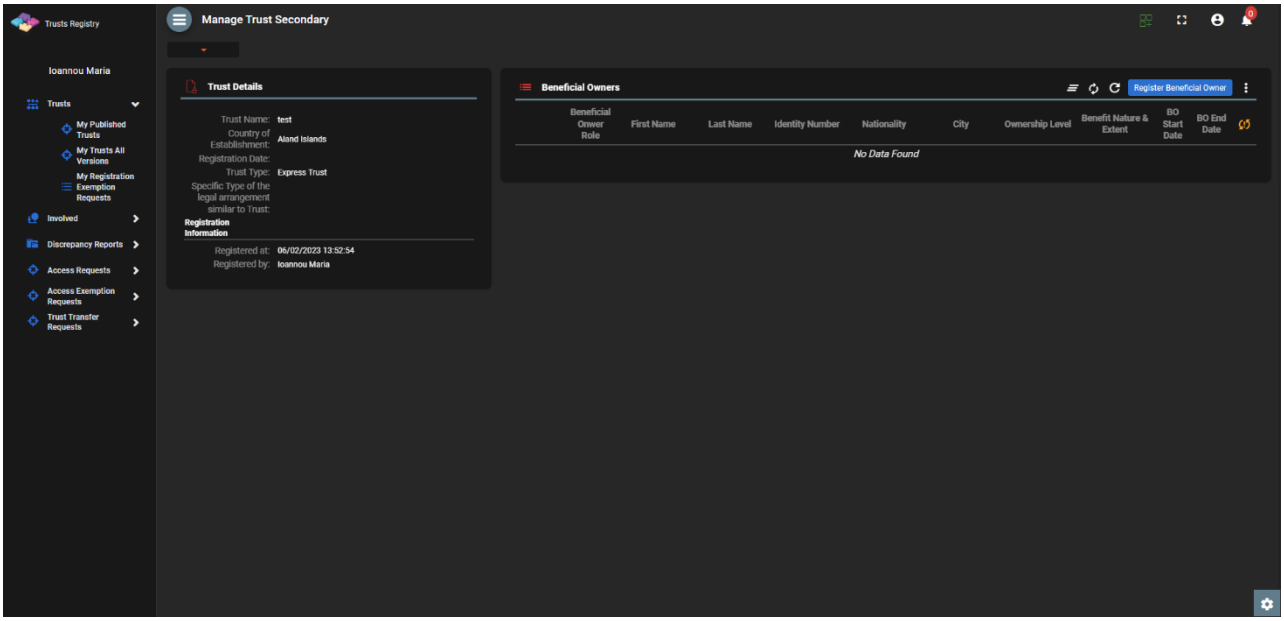
It is noted that the registration form is dynamically adjusted according to the user's options.

3.2.10. Trust Declared as a Beneficial Owner of a Trust registered in the Register (Manage 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 of a Trust registered in the Register.

Some of the functions provided, especially those related to the registration or updating of data, are provided (displayed or allowed) only if the Trust issue under management is draft (ie not yet published).

This feature is only available if the Real Beneficiary has declared that it is a Trust.



"Secondary" Trust Management Screen

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

Card	Mode	Position	Reference
Trust Details	No Action		
Beneficial Owners	Register Beneficial Owner (Registration of a Beneficial Owner) *This featureallowed only if the version under management is in draft state*	Header (text)	Chapter 3.2.12
	Edit Beneficial (Registration of a Real Beneficiary for a Trust who is the Real Beneficiary of a Trust in the Registerin edit mode.) *This featureallowed only if the version under management is in draft state*	Recordset	Chapter 3.2.12
	View Beneficial Owner Details	Recordset	Chapter 3.2.12

	(Registration of a Real Beneficiary for a Trust who is the Real Beneficiary of a Trust in the Registerin view mode)		

This screen also covers the function of accessing the information of the secondary Trust, when it is performed by the option "Secondary Trust Overview", without the registration / update functions..

3.2.11. Registration of a Beneficial Owner of a Trust who is the Beneficial Owner of an Express Trust registered to the system (Register Beneficial Owner)

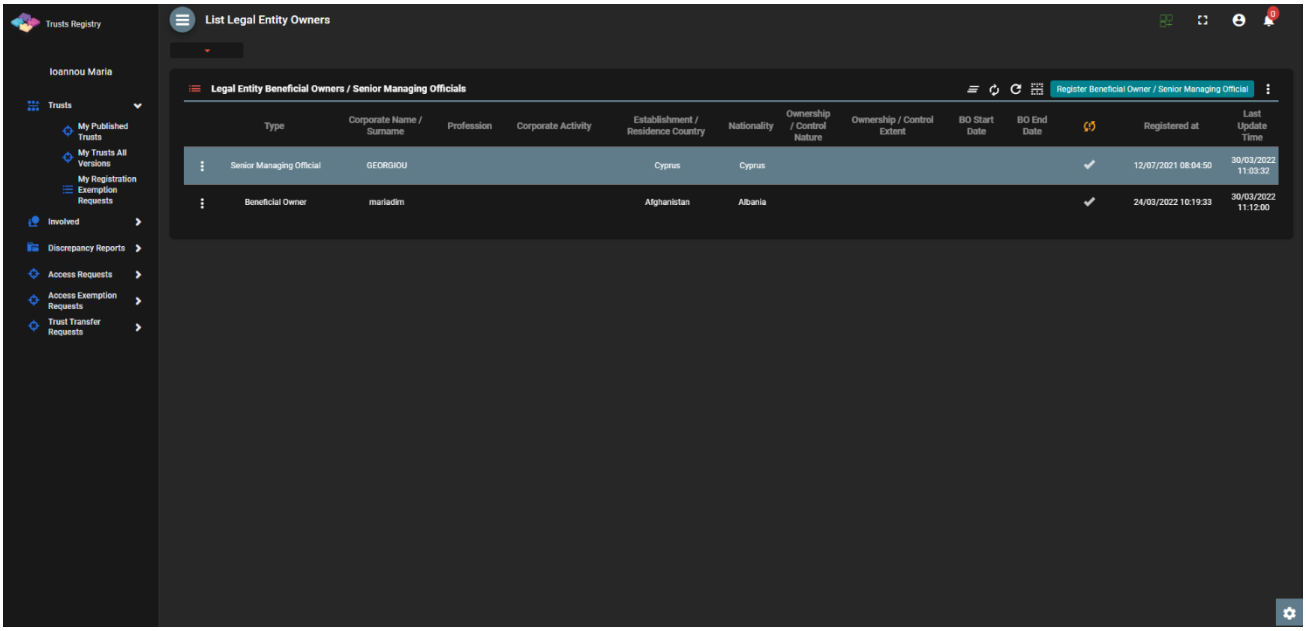
The operation is the same as that described in Chapter "Registration of a Real Beneficiary" (Chapter 3.2.9) except that only the 'Natural Person' option is allowed in the 'Entity Type' field.

3.2.12. Overview of Beneficial Owners / Senior 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 Real Beneficiary of the Register.

Some of the functions provided, especially those related to the registration or updating of data, are provided (appear or are allowed) only if the Trust issue under management is draft (ie not yet published)

This feature is only available if the Real Beneficiary has been declared a Legal Entity.



Screen of Real Beneficiaries / Legal Entities Directors

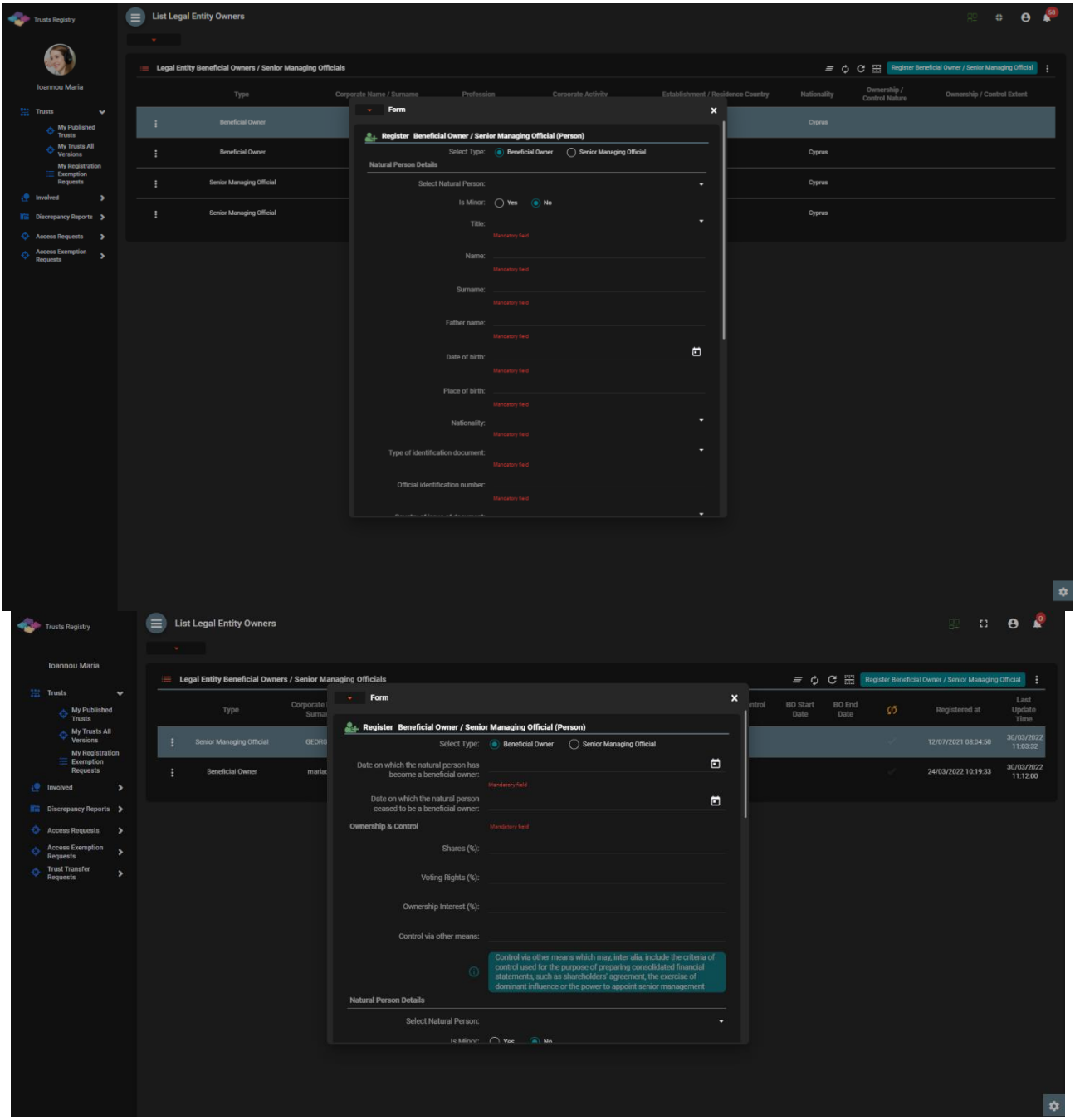
From the screen of Real Beneficiaries / Beneficiary Directors of a Legal Entity, the following functions are provided per presented card:

Card	Mode	Position	Reference
	Register Beneficial Owner / Senior Managing Official	Header (text)	Chapter 2.2.14

View Beneficial Owners / Senior Managing Officials	(Registration of Real Beneficiary / Director of Legal Entity) *This featureallowed only if the version under management is in draft state*		
	Edit Beneficial Owner / Managing Official (Registration of Real Beneficiary / Director of Legal Entityin edit mode.) This feature*allowed only if the version under management is in draft state*	Recordset	Chapter 2.2.14
	View Beneficial Owner / Managing Official (Registration of Real Beneficiary / Directorin view mode)	Recordset	Chapter 2.2.14

3.2.13. Registration of a Beneficial Owner/ Senior Managing Official (Register Beneficial Owner)

Functionaims to register the details of a Real Beneficiary / Director of a Legal Entity that is a Natural Person.



Real Beneficiary / Legal Entity Registration Screen

To register a Real Beneficiary / Legal Entity Director, the user must complete the following information:

Field Name	Field Type	Shows up	Mandatory	Remarks
Select Type	Check box with the following options: a) Beneficial Owner b) Senior Managing Official	YES with default value the (b)	YES	Type

Natural Person Details Section		YES if the value "Natural Person" has been selected in the Entity Type field (applies to all Section fields)		
Select Natural Person	Menu of options with Natural Persons registered by the user	YES	NO	The user can select one of the Individuals registered in the system (or re-register an Individual). Note:In the case of selecting a Natural Person from the database, the following fields related to the Natural Person are filled in automatically, and appear locked. The user can deselect the Individual he has selected by selecting the "Clear" value from the options menu, or change his choice
Is Minor	Check box YES / NO (check box)	YES (with default value NO)	YES	Indicates whether the natural person is a minor
Guardian	Sub form of registration of a Natural Person as a Guardian	YES if YES is selected in the Is Minor field	YES if it appears	See Individual Registration Form (section 4.6.1)
Title	Options menu with the following values: a) Mr b) Ms c) Miss d) Other	YES	YES as long as it does not appear locked	The field is locked if a YES value is selected in the "Is Minor" field
Name	Text field	YES	YES	Name
Surname	Text field	YES	YES	Last name
Father name	Text field	YES	YES	Father's name
Date of birth	Select from Date Picker (or enter date in DD / MM / YYYY format)	YES	YES	Date of birth
Place of birth	Text field	YES	YES	Place of birth
Nationality	Menu of options with the nationalities (countries) of the base	YES	YES	Nationality
Second Nationality	Menu of options with the nationalities (countries) of the base	YES	NO	Secondary Nationality The field is locked if Nationality is not selected
Type of identification document	Options menu with the following options:	YES	YES	Identification Document Type

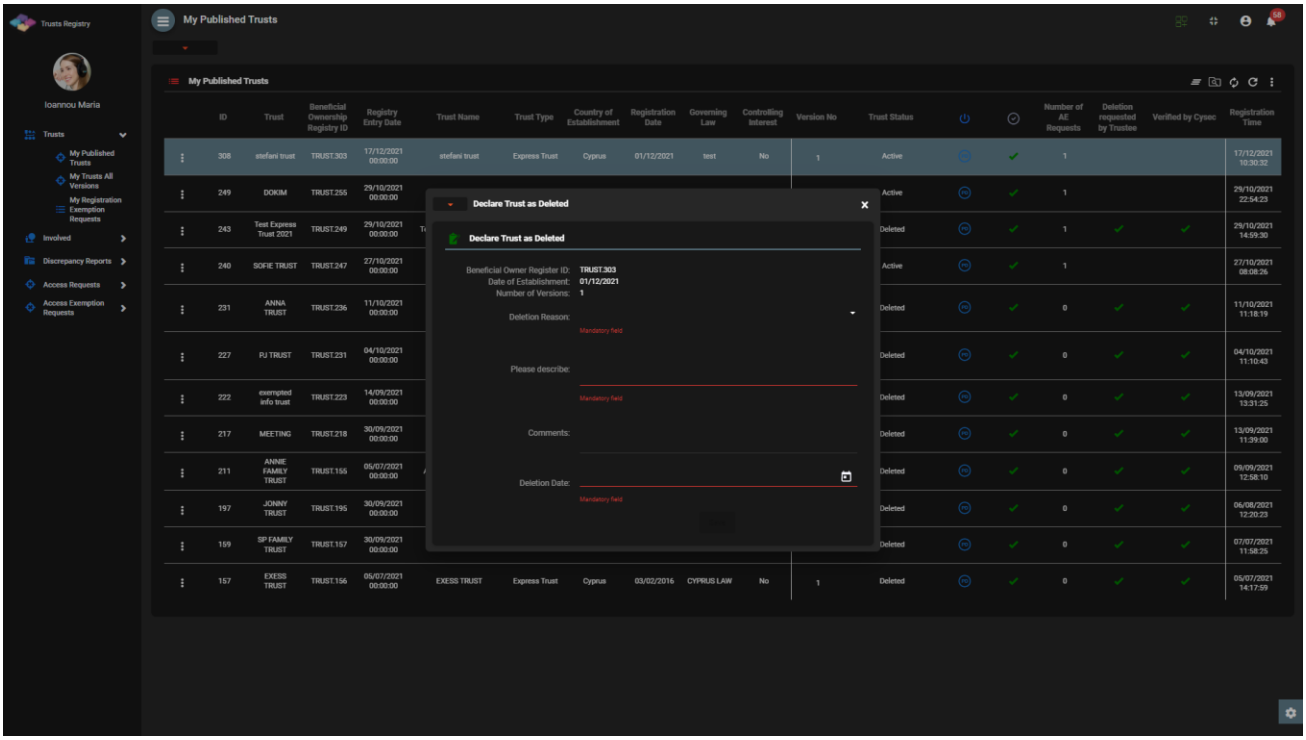
	a) Identity Card b) Passport c) Birth Certificate			If the Natural Person has been selected as a minor, only the "Birth Certificate" option is provided (also displayed by default) In another case, if Cypriot Nationality has been selected, only the "Identity Card Certificate" option is provided (also displayed as default), while for all other nationalities, "Identity Card" and "Passport" options are provided.
Official identification number	Text Field	YES	YES	The Identification Document number declared in the previous field
Country of issue of document	Menu of options with the countries of the base	YES	YES	Country of issue of the identification document selected above
Date of issue of the document	Select from Date Picker (or enter date in DD / MM / YYYY format)	YES	YES	Document Issue Date
Date of expiration of the document	Select from Date Picker (or enter date in DD / MM / YYYY format)	YES	YES	Document Expiry Date EKK: See comment above.
Diseased	Check box YES / NO (check box)	YES (with default value NO)	YES	Indicates whether the Natural Person has died
Year of death	Text Field (allows only registration of a four-digit number (format YYYY) with lower in 1800 and higher in the current year)	YES if YES value is selected in the previous field	NO if displayed	Year of death
Residential Address (Sub Section)		YES if NO value has been selected in the previous field (applies to all fields of the Sub Section)		
Country	Menu of options with the countries of the base	YES	YES	Country of Residence
City	Text Field (only letters are allowed)	YES	YES	Residence City
Post code	Text Field (only letters and numbers are allowed - no special characters)	YES	YES	Housing Postal Code
Address	Text Field	YES	YES	Address (street - area)

	(only letters and numbers are allowed - no special characters)			
Number	Text Field (only letters and numbers are allowed - no special characters)	YES	YES	Number (street)
Ownership & Control Section		Appears if 'Beneficial owner' value is selected		A tooltip with the text "FATF guidance transparency and beneficial ownership" appears on mouse overhttp://www.fatf-gafi.org/media/fatf/documents/reports/Guidance-transparency-beneficial-ownership.pdfWhich is also a hyperlink
Shares (%)	Number from 0 to 100	YES if Entity Type = Legal Entity is selected	NO	The sum of the percentages must be more than 25%, unless a value has been filled in the field Control via other means
Voting Rights (%)	Number from 0 to 100	YES if Entity Type = Legal Entity is selected	NO	
Ownership Interest (%)	Number from 0 to 100	YES if Entity Type = Legal Entity is selected	NO	
Control via other means	Text field	YES if Entity Type = Legal Entity is selected	NO	
Note	Information Message "Control via other means which may, inter alia, include the criteria of control used for the purpose of preparing consolidated financial statements, such as shareholders' agreement, the exercise of dominant influence or the power to appoint senior management"	YES if Entity Type = Legal Entity is selected	-	Update message

The above card and function is also used in case the user wishes to update the details of the Real Beneficiary / Director of Legal Entity (Natural Person) (edit form) or to have easy access to them (view form).

3.2.14. Declare Trust as Deleted

The purpose of this function is to declare a Trust as deleted, by the user who registered it (essentially it concerns the registration of a relevant application for approval by the Capital Market).



ScreenDeclare as Deleted by Trustee

To register a Confidentiality Statement as Deleted, the user must fill in the following information:

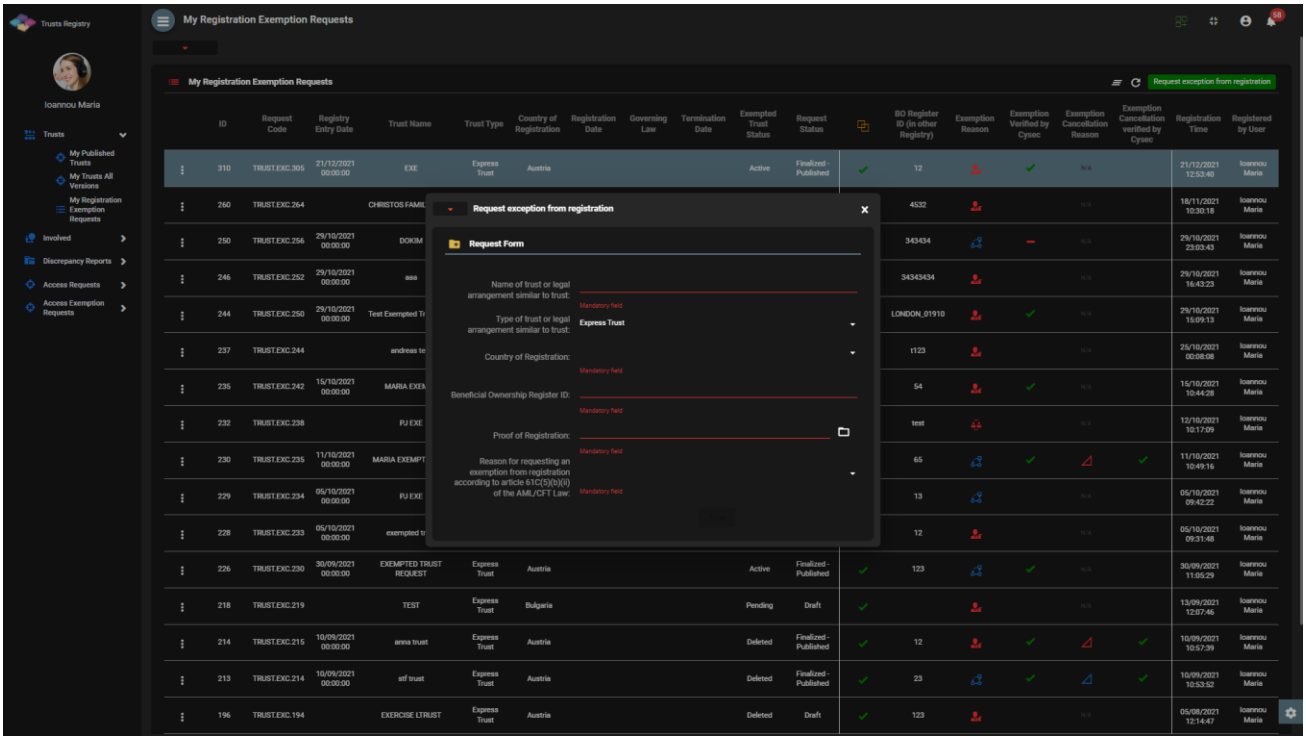
Field Name	Field Type	Shows up	Mandatory	Remarks
Beneficial Owner Register ID	-	YES	-	Unique Identification Number in the Register
Date of Establishment	-	YES	-	Date of Establishment of Trust
Number of Versions	-	YES	-	Number of Publications
Deletion Reason	Menu options with prices: The condition of section A61C (5) (b) (i) of the AML / CFT Law do not apply The condition of section A61C (5) (b) (ii) of the AML / CFT Law do not apply It is no longer in force Other reason	YES	YES	Reason for Deletion
Please describe	Text field	YES	YES	Speech description
Comments	Text Field	YES	NO	Comments
Deletion Date	Select from Date Picker (or enter date in DD / MM / YYYY format)	YES	YES	Deleting date

3.3 Trust Management with a request for exemption from the Register

3.3.1. Request Exemption from Registration

This function concerns the registration of the basic elements of a Request for Exemption of Trust from the Register.

Upon completion of the action, the system saves the Application / Exempted Trust in "Pending" mode and assigns it a unique registration number (TRUST.EXC.ID) for each Application (Exempted Trust) and then takes the user to its management screen Exemption Application (see section 2.3.3)



Screen - Trust Exemption Application Registration Popup

To enter a Trust Exemption Application from the Register, the user must fill in the following information:

Field Name	Field Type	Shows up	Mandatory	Remarks
Name of trust or legal arrangement similar to trust	Text field	YES	YES	
Type of trust or legal arrangement similar to trust	Options menu with the following options: a) express trust b) legal arrangement similar to Trust c) Legal Arrangement	YES	YES	

	Similar to Trust without a Settlor			
Include the specific type of the legal arrangement similar to Trust	Text field	YES if a "legal arrangement similar to Trust" value is selected in the previous field	YES when it appears	The field displays tooltip «https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/? uri = CELEX: 52019XC1024 (01) & from = GA»
Country of Registration	Menu of options with the countries of the European Union	YES	YES	
Beneficial Ownership Register ID	Text Field	YES	YES	Trust registration number
Proof of Registration	Select file from disk	YES	YES	Proof of registration in the Trusts Register of the country selected above
Reason for requesting an exemption from registration according to article 61C (5) (b) (ii) of the AML / CFT Law	Options menu with the following options: α) the trustee or person holding equivalent position in a similar legal arrangement is established or resides in another member state and not the Republic of Cyprus. β) Where the trustees or persons holding equivalent position in a similar legal arrangement are established or reside in different member states, and one of them is established or resides in the Republic of Cyprus. γ) where the trustee or person holding equivalent position in a similar legal arrangement enters into multiple business relationships in the name of the	YES	YES	In case a) or b) is selected, the user should enter information about the Trustes of the Trust through the Trust management screen In case c) is selected, the user should enter data for the Member States in which a Business Relationship has been established through the Trust management screen

	trust or similar legal arrangement in different member states, including the Republic of Cyprus			

3.3.2. Deletion of a Trust Exemption Request from the Register

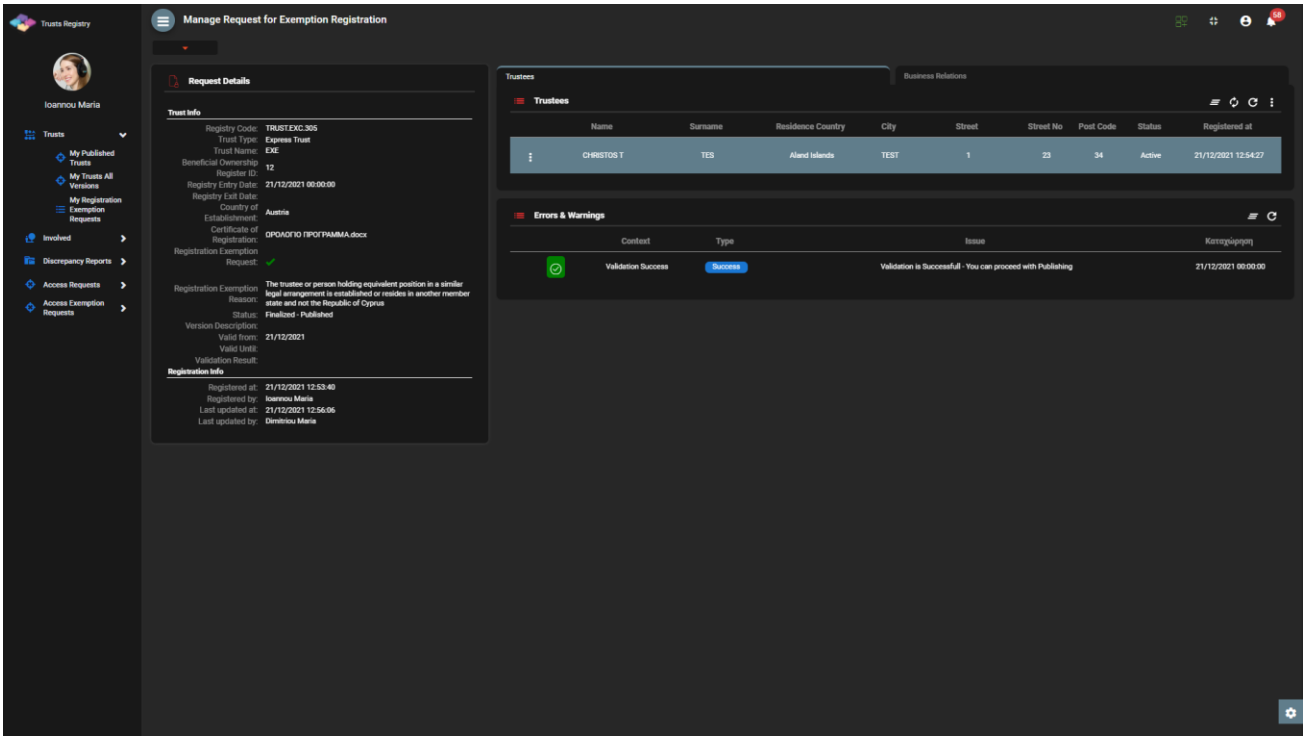
This function concerns the (physical) deletion of a Trust Exemption Request from the Register by the user who has registered it.

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

3.3.3. Management of Exemption Requests

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

Part of the functions provided, especially those related to the registration or updating of data, is provided (displayed or allowed) only if the Exemption Application under management is draft (ie has not yet been published / submitted)



Trust management screen with Exception request is presented below

The following functions per presented card are provided from the Exemption Application Management screen:

Card	Mode	Position	Reference
Request Details	Validate (Exemption Application Check) *This feature is only allowedin case the managed version is in draft state*	Header (text)	Chapter 3.3.4
	Publish (Publication of Exemption Request) *This feature is only allowedin case the Managed Application is in draft status, and only after the Validation of the Application has been completed (essentially only allowed if the message Warnings & Errors includes a message with a green indication)*	Header	Chapter 3.3.5
	Edit (Application Update) *This feature is only allowedin case the Application under management is in draft status*	Header	Chapter 3.3.5
Trustees	Register Trustee Truste entrye in Exemption Request) *This featureallowed only if the Application under management is in draft condition*	Header	Chapter 3.3.6
	Edit (Trustee Registration in Exemption Request) *This featureallowed only if the Application under management is in draft condition*	Header	Chapter 3.3.6
Business Relations	Register Business Relation (Registration of Business Relationship in Exemption Application) *This featureallowed only if the Application under management is in draft condition*	Header	Chapter 3.3.7
	Business Relation (Registration of a Business Relationship in an Exemption Request in edit mode) *This featureallowed only if the Application under management is in draft Edit status*	Recordset	Chapter 3.3.7

3.3.4. Exemption Request Check (Validate)

This function concerns the control of the correctness and completeness of the data of a Trust Exemption Application from the Register. When activating this function, the system:

- Deletes the results of any previous test
- Performs the checks described in the table below
- Displays the test results at the bottom right of the screen (system notification)
- Saves and displays the test results (warnings & errors) on the Warnings & Errors card of the Exception Claim Management screen.

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

The following checks are performed when the function is activated:

Category / Control	Message Type	Control Level	Remarks
General Audits			
Check if all the mandatory information has been entered in the main Exemption Request screen	Error	Request	Although the system does not allow the user to save / create an Exemption Request if all the required information has not been completed, this control is also integrated
Specialized checks for Exemption Request			
If it has been stated that the reason for Registration Exemption is "The trustee or person holding equivalent position in a similar legal arrangement is established or resides in another member state and not the Republic of Cyprus"			
Check if only one Trustee is registered for the Trust (and no Business Relationships)	Error	Trustees	
Check if Business Relation has been registered for the Trust	Warning	Business Relations	
If it has been stated that the reason for Registration Exemption is "The trustees or persons holding equivalent position in a similar legal arrangement are established or reside in different member states, and one of them is established or resides in the Republic of Cyprus"			
Check if at least one Trustee has been registered for the Trust	Error	Trustees	It applies if it has been stated that the reason for the Registration Exemption is "The trustees or persons holding equivalent position in a similar legal arrangement are established or reside in different member states, and one of them is established or resides in the Republic of Cyprus"
Check if Business Relation has been registered for the Trust	Warning	Business Relations	
If it has been stated that the reason for Registration Exemption is "The trustee or person holding equivalent position in a similar legal arrangement enters into multiple business relationships in the name of the trust or similar legal arrangement in different member states, including the Republic of Cyprus"			
Check if at least one Business Relation has been registered for the Trust (and no Trustee)	Error	Business Relations	

3.3.5. Publish Exemption Request

This function concerns the publication / submission of a (Draft) Application for Exemption of Trust from the Register. When activating this function:

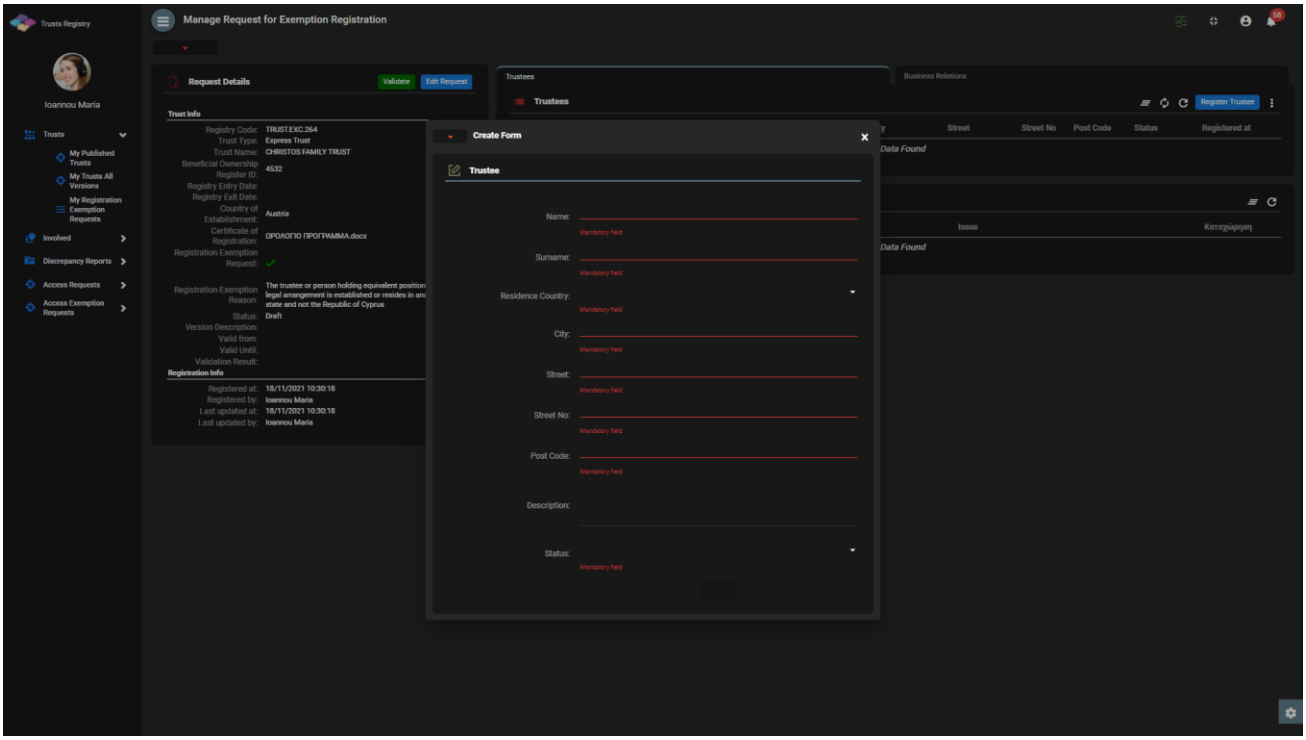
- The system performs the "Exemption Request Check" function
- In case the control is successful (ie includes only warnings), the system changes the status of the Application to "Published" (Active), and accordingly now appears in the corresponding directories.

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

The publication of an Exemption Request from the Registry is a function that does NOT consume Credits in the relevant Subscription.

3.3.6. Register Trustee in Exemption Request (Register Trustee)

This function involves entering the details of a Trustee into a Trust Exemption Request from the Registry.



Trustee Registration Screen in a Trust Exemption Request from the Registry

To register a Trustee, the user must fill in the following information:

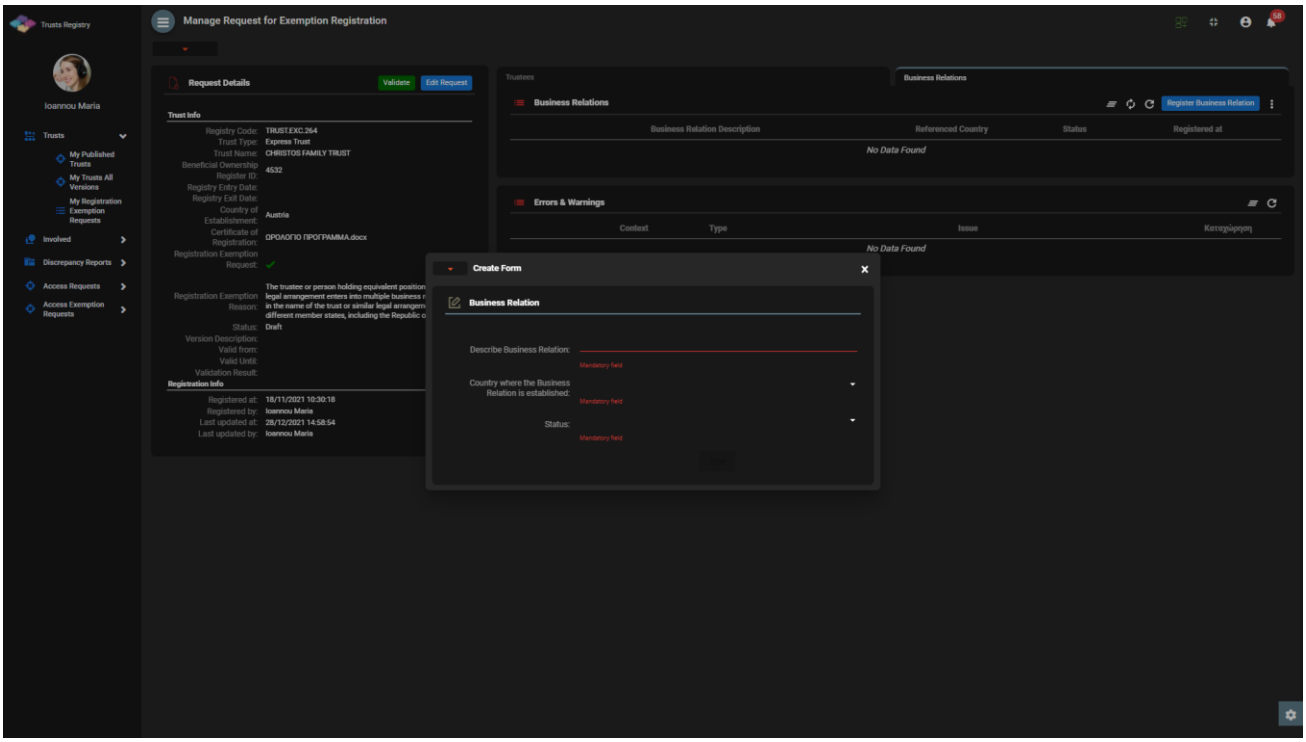
Field Name	Field Type	Shows up	Mandatory	Remarks
Name	Text field	YES	YES	
Surname	Text field	YES	YES	
Residence Country	Field of options with the countries of the base	YES	YES	
City	Text field	YES	YES	
Street	Text field	YES	YES	
Street No	Text field	YES	YES	
Post Code	Text field	YES	YES	
Description	Text field	YES	YES	

Status	Field of options with Active, Deactivated values	YES	YES	

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

3.3.7. Register Business Relationship Request

This function concerns the registration of the details of a Business Relationship in an Exemption Application from the Register.



Business Relationship Registration Popup Screen

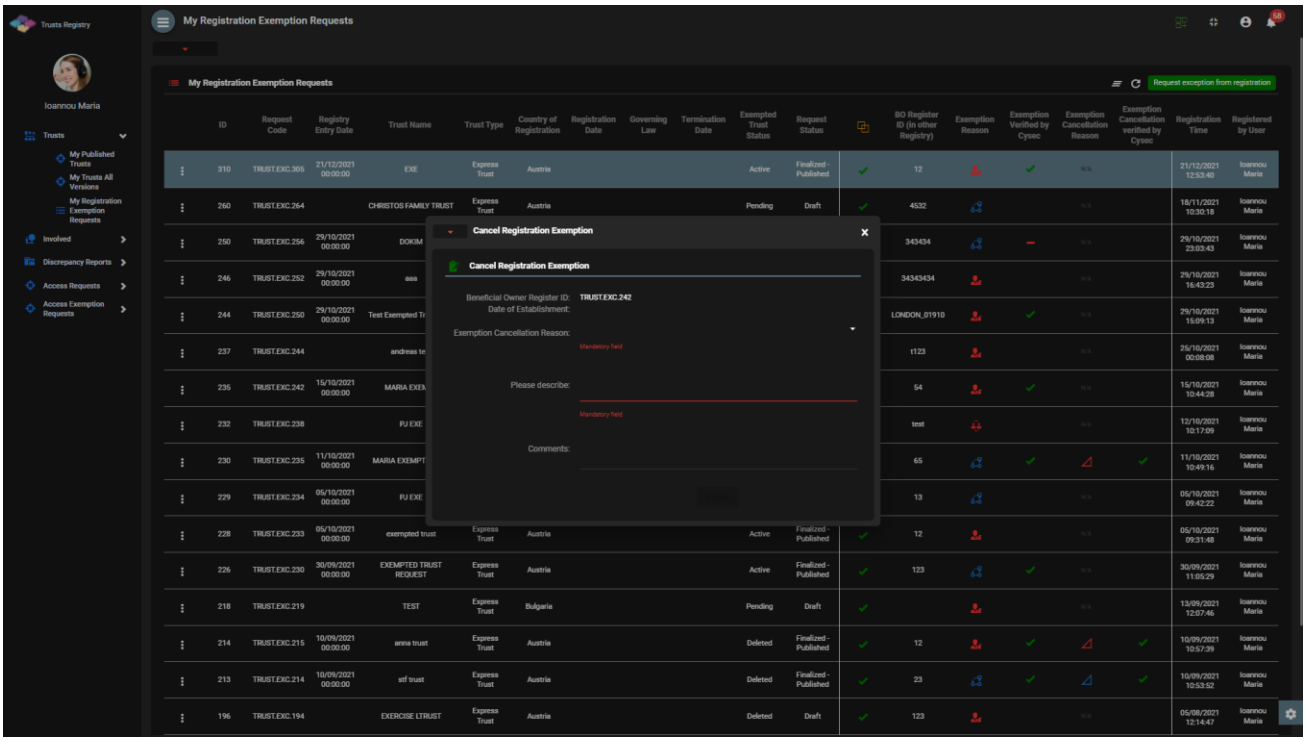
To register a Business Relationship, the user must fill in the following information:

Field Name	Field Type	Shows up	Mandatory	Remarks
Describe Business Relation	Text field	YES	YES	
Country where the Business Relation is established	Field of options with the countries of the base	YES	YES	
Status	Field of options with Active, Deactivated values	YES	YES	

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

3.3.8. Cancel Registration Exemption

This function concerns the cancellation of the Exemption of Registration of a Trust from the Register by the user who registers the relevant application (by submitting a relevant request).



Cancel Registration Exemption Cancel Screen from the Registry

To cancel an Exemption from Registration of a Trust from the Registry, the user must fill in the following information:

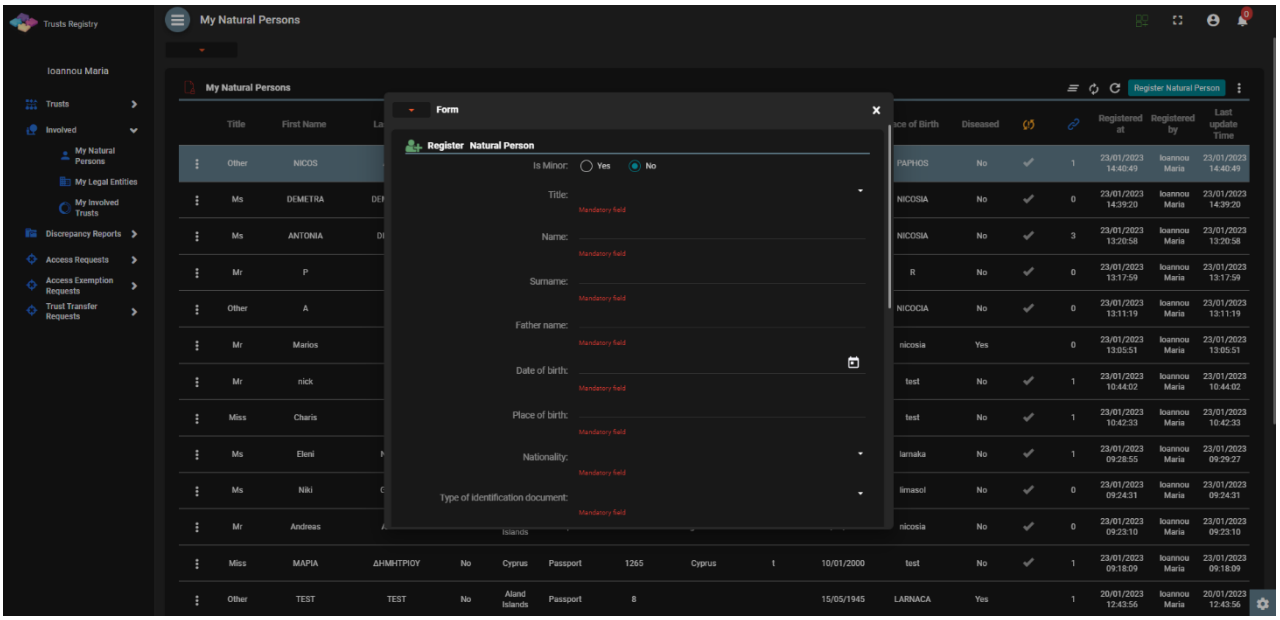
Field Name	Field Type	Shows up	Mandatory	Remarks
Beneficial Owner Register ID	-	YES	-	Trust registration number
Date of Establishment	-	YES	-	Date of foundation
Exemption Cancellation Reason	Selection field with prices The circumstances of section 61C (5) (c) (i) of the AML / CFT Law do not apply The circumstances of section 61C (5) (c) (ii) of the AML / CFT Law do not apply	YES	YES	Reason for Cancellation of Exception

	The circumstances of section 61C (5) (c) (iii) of the AML / CFT Law do not apply			
Please describe	Text field	YES	NO	
Comments	Text field	YES	NO	

3.4. Natural Person Management

3.4.1. Register Natural Person

This function concerns the registration of the data of a Natural Person.



Individual Data Entry Screen

To enter details of a Natural Person, the user must fill in the following details:

Field Name	Field Type	Shows up	Mandatory	Remarks
Is Minor	Check box YES / NO (check box)	YES (with default value NO)	YES	Indicates whether the natural person is a minor
Guardian	Sub form of registration of a Natural Person as a Guardian	YES if YES is selected in the Is Minor field	YES if it appears	See Chapter 2.4.1
Title	Options menu with the following values: a) Mr b) Ms c) Miss d) Other	YES	YES as long as it does not appear locked	Field is locked if no value is selected in the "Is Minor" field or YES value is selected
Name	Text field	YES	YES	Name

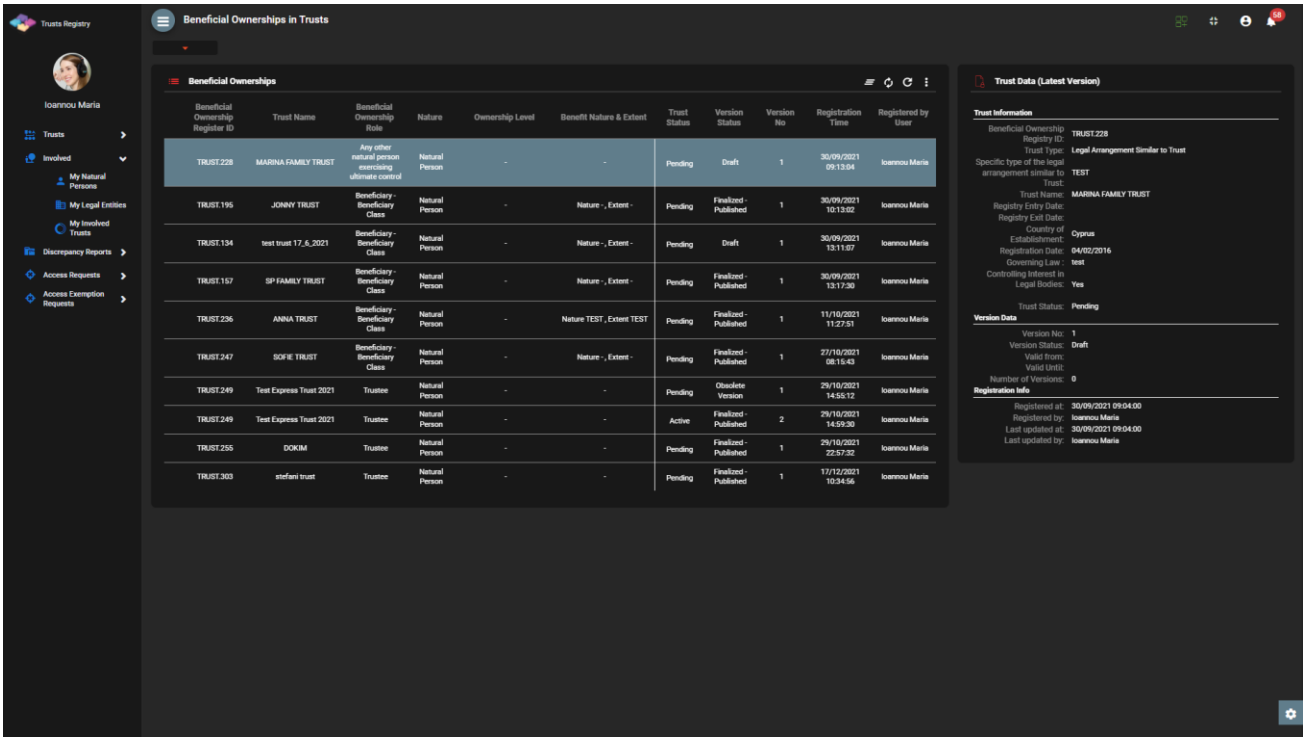
Surname	Text field	YES	YES	Last name
Father name	Text field	YES	YES	Father's name
Date of birth	Select from Date Picker (or enter date in DD / MM / YYYY format)	YES	YES	Date of birth
Place of birth	Text field	YES	YES	Place of birth
Nationality	Menu of options with the nationalities (countries) of the base	YES	YES	Nationality
Second Nationality	Menu of options with the nationalities (countries) of the base	YES	NO	Secondary Nationality The field is locked if Nationality is not selected
Type of identification document	Options menu with the following options: A) Identity Card B) Passport c) Birth Certificate	YES	YES	Identification Document Type If the Natural Person has been selected as a minor, only the "Birth Certificate" option is provided (also displayed by default) In another case, if Cypriot Nationality has been selected, only the "Identity Card Certificate" option is provided (also displayed as default), while for all other nationalities, "Identity Card" and "Passport" options are provided.
Official identification number	Text Field	YES	YES	The Identification Document number declared in the previous field
Country of issue of document	Menu of options with the countries of the base	YES	YES	Country of issue of the identification document selected above
Date of issue of the document	Select from Date Picker (or enter date in DD / MM / YYYY format)	YES	YES	Document Issue Date
Date of expiration of the document	Select from Date Picker (or enter date in DD / MM / YYYY format)	YES	YES	Document Expiry Date
Diseased	Check box YES / NO (check box)	YES (with default value NO)	YES	Indicates whether the Natural Person has died. Also, in this case the system does not check for invalid identification documents
Year of death	Text Field (allows only registration of a four-digit number (format YYYY) with lower in 1800 and higher in the current year)	YES if YES value is selected in the previous field	NO if displayed	Year of death
Residential Address (Sub Section)	YES if OXI value has been selected in the previous field (applies to all fields of the Sub Section)			

Country	Menu of options with the countries of the base	YES	YES	Country of Residence
City	Text Field (only letters are allowed)	YES	YES	Residence City
Post code	Text Field (only letters and numbers are allowed - no special characters)	YES	YES	Housing Postal Code
Address	Text Field (only letters and numbers are allowed - no special characters)	YES	YES	Address (street - area)
Number	Text Field (only letters and numbers are allowed - no special characters)	YES	YES	Number (street)

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

3.4.2. Involvement in Registry Trusts (Beneficial Ownerships)

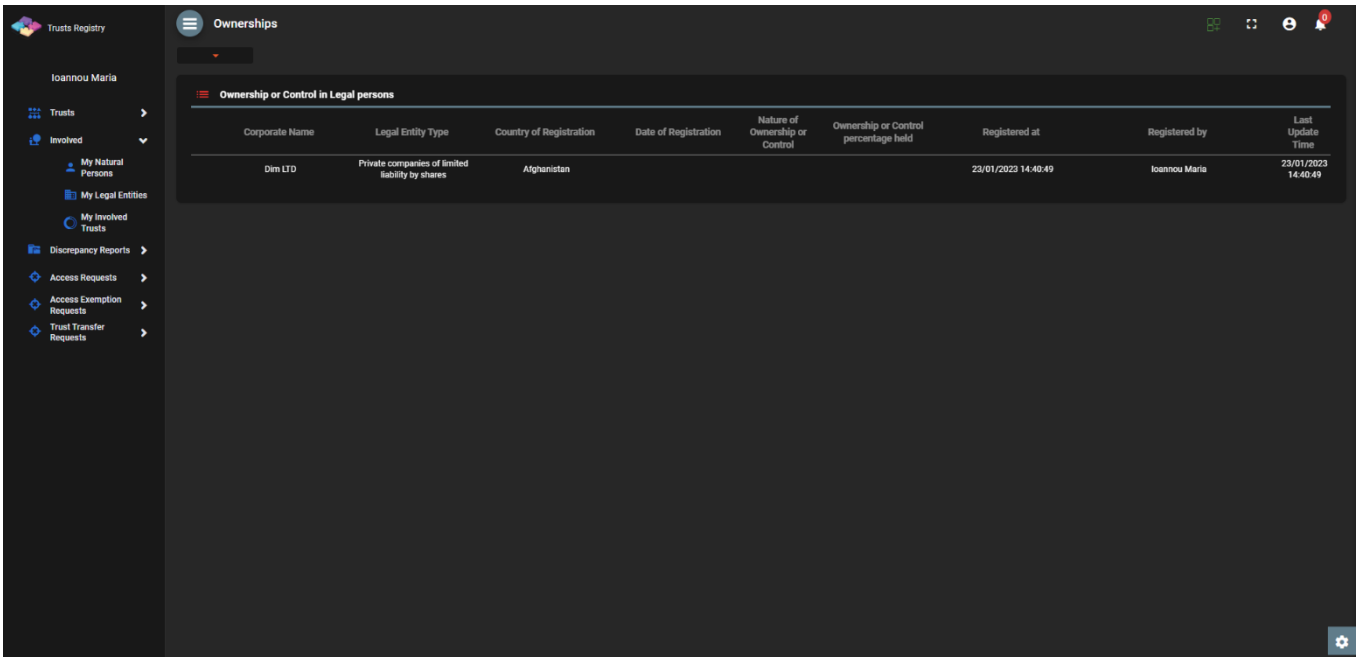
This function concerns the presentation of the Trusts of the Register in which the Natural Person has been registered as a Real Beneficiary.



Registry Trust Engagement Screen

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

This function concerns the presentation of the Legal Entities in which the selected Natural Person has been declared as the Real Beneficiary / Director.

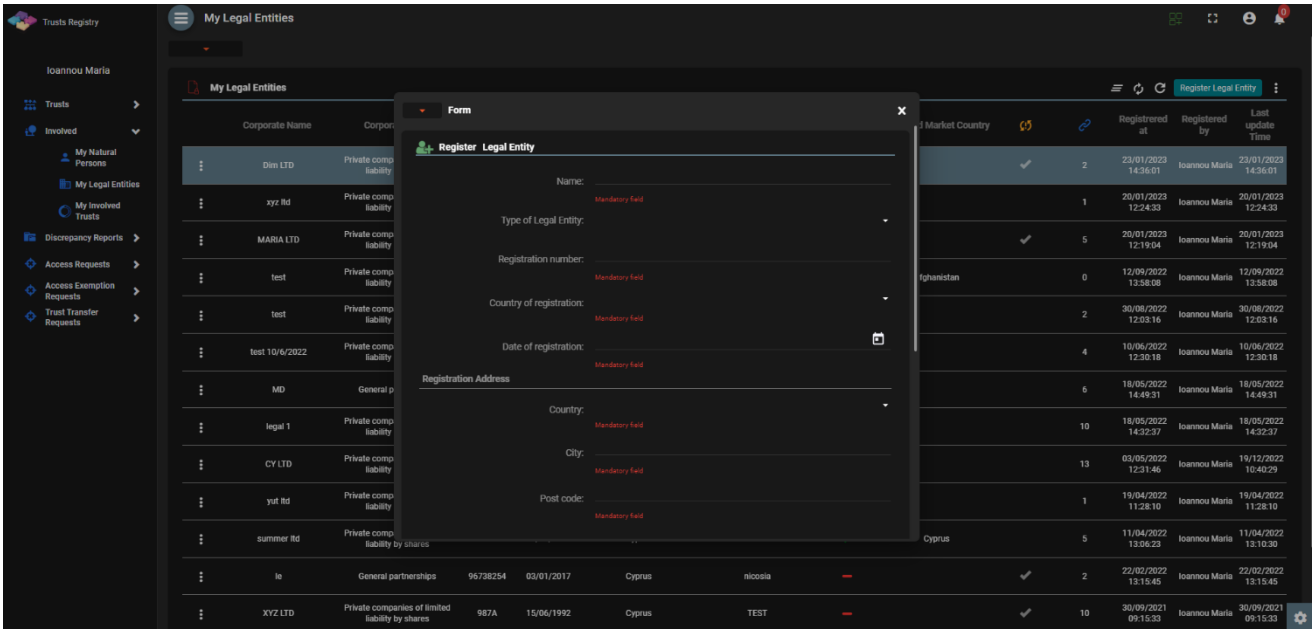


Participation Screen for Legal Entities (Ownership & Control in Legal Entities)

3.5. Legal Entity Management

3.5.1. Register Legal Entity

This function performs the registration of the data of a Legal Entity.



Pop-up Data Registration Screen (Register Legal Entity)

To enter details of a Legal Entity, the user must fill in the following details:

Field Name	Field Type	Shows up	Mandatory	Remarks
Name	Text field	YES	YES	Name
Type of Legal Entity	Options Menu with the following values: a) Private companies of limited liability by shares b) General partnerships c) Societies d) Overseas companies e) Limited partnerships f) Public companies of limited liability by shares g) Public and private companies of limited liability by guarantee without share capital h) Private companies of limited liability by guarantee with share capital i) European companies (SE) j) Public companies of limited liability by guarantee with share capital k) Federations and associations λ) Other	YES	YES	Type of Legal Entity

Describe Type	Text field	YES if the value "Other" has been selected in the previous field	YES if it appears	Press Description
Registration number	Text field	YES	YES	Company Registration Number
Country of registration	Menu of options with the countries of the base	YES	YES	Country of Registration
Date of Registration	Select from Date Picker (or enter date in DD / MM / YYYY format)	YES	YES	Registration date
Registered Address Info (Sub Section)				
Country	Menu of options with the countries of the base	YES	YES	Country of Headquarters
City	Text Field (only letters are allowed)	YES	YES	Headquarters City
Post code	Text Field (only letters and numbers are allowed - no special characters)	YES	YES	Postcode of Headquarters
Address	Text Field (only letters and numbers are allowed - no special characters)	YES	YES	Address (street - area)
Number	Text Field (only letters and numbers are allowed - no special characters)	YES	YES	Number (street)
Ownership (Sub Section)				
The legal entity is a company listed on a regulated market that is subject to disclosure requirements consistent with Union law or subject to equivalent international standards which ensure adequate transparency of ownership information	Check box YES / NO (check box)	YES	YES	Indicates whether the Legal Entity is registered in a regulated market
Note	Information message «You will later have to complete natural person (s) that owns or controls more than 25% plus one share of the entity or through control via other means»	YES if the previous field has a value of NO	-	Message that the user should register the natural persons who have or control the Legal Entity
Note	Information message "If there is no natural person	YES if the previous	-	Message that the user should register the natural

	that owns or controls more than 25% plus one share of the entity or through control via other means is identified, or if there is any doubt that the person (s) identified are the beneficial owner (s), you will have to complete the natural person (s) who hold the position of senior managing official (s) "	field has a value of NO		persons who run the Legal Entity
Name of Regulated market	Text field	YES if a YES value is selected in the first field of the section	YES if it appears	Regulated Market Name
Country of Regulated market	Menu of options with the countries of the base	YES if the previous field is displayed	YES if it appears	Country of Regulated Market

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

3.5.2. Involvement in registered Trusts (Beneficial Ownerships)

This function is similar to that described in Chapter 2.4.2, except that it concerns the selected Legal Entity.

3.5.3. Beneficial Owners / Managing Officials Overview

This function is similar to that described in Chapter 2.2.13.

3.5.4. Registration of a Beneficial Owner/ Senior Managing Official (Register Beneficial Owner)

This function is similar to that described in Chapter 2.2.14.

3.6. Secondary Trust Management

3.6.1. Involvement in Registred Trusts (Beneficial Ownerships)

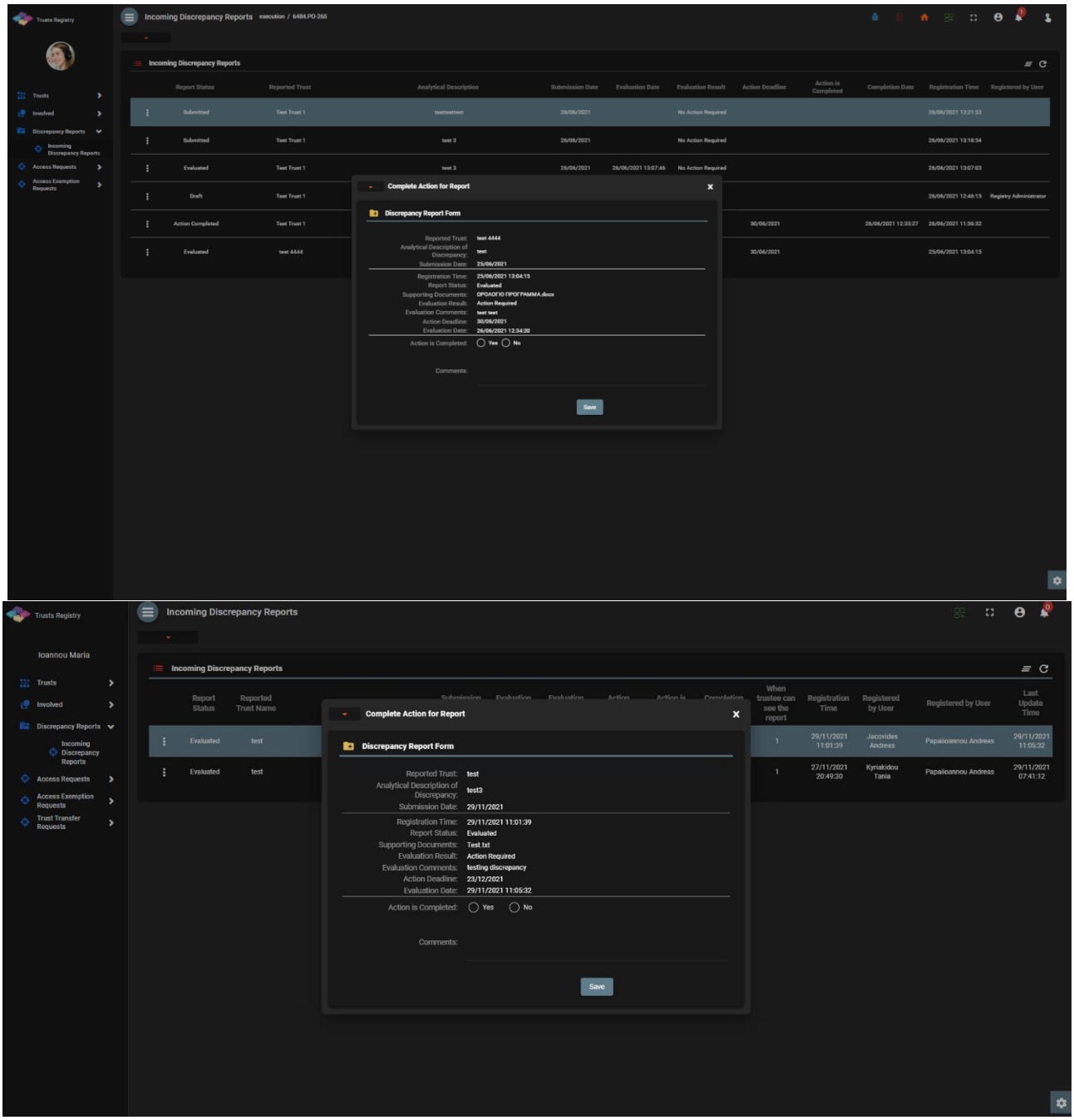
This function is similar to that described in Chapter 2.4.2, except that it relates to the selected (secondary) Trust.

3.7. Discrepancy Report Management

3.7.1. Review of Discrepancy Report (Review)

This function is to determine compliance with the provisions when evaluating a Discrepancy Report, by the Trustee managing the Trust (in the Report) Trust.

The feature is only available if the report status is Evaluated and action is required by Trustee



Discrepancy Report Screen (Review Report)

To enter Discrepancy Report information, the user must fill in the following information:

Field Name	Field Type	Shows up	Mandatory	Remarks
Reported Trust	-	YES	-	Name of the Trust mentioned
Analytical Description of Discrepancy	-	YES	-	Detailed description of Discrepancy
Submission Date	-	YES	-	Date of submission
Registration Time	-	YES	-	Date & Time of Registration
Report Status	-	YES	-	Reference Status
Supporting Document	-	YES	-	Supporting Document
Evaluation Result	-	YES	-	Evaluation Result
Evaluation Comments	-	YES	-	Evaluation Comments
Action Deadline	-	YES	-	Compliance Deadline
Evaluation Date	-	YES	-	Evaluation Date
Action is Completed	Check box YES / NO (check box)	YES	NO	
Comments	Text field	YES	NO	Comments

3.7.2. Complete Review of Discrepancy Report (Complete Review)

This function involves completing the process of verifying a Discrepancy Report, by Trustee managing the Trust.

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

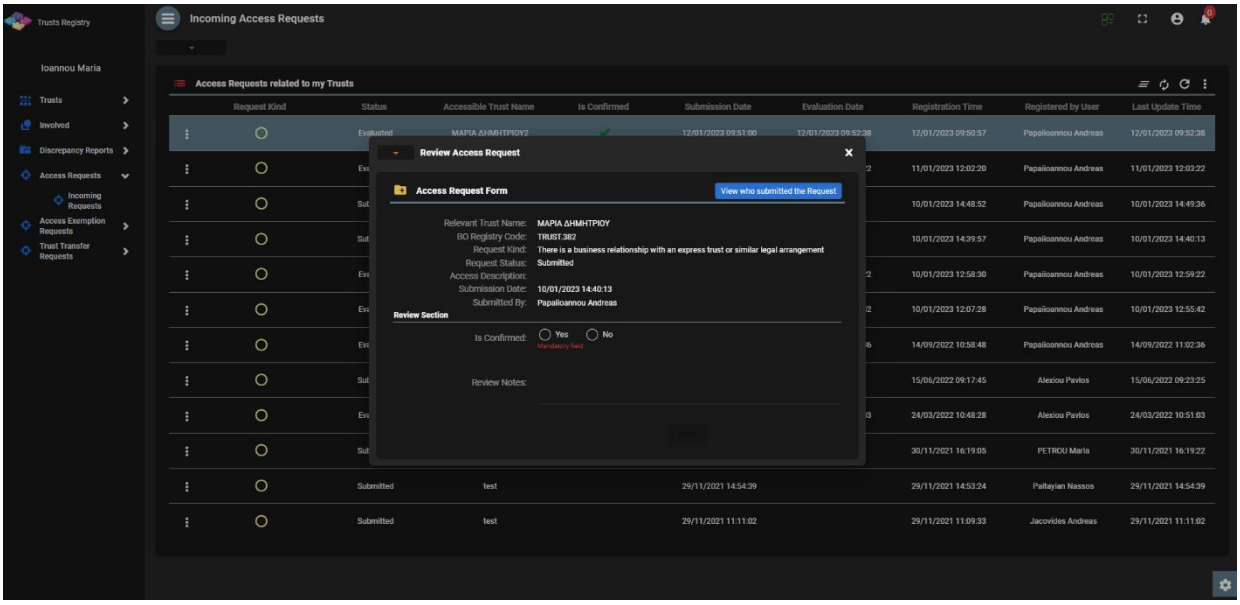
The feature is only available if the report status is Evaluated and action is required by Trustee

3.8. Access Request Management

3.8.1. Trustee Access Request Check

This function concerns the control of a submitted Request for Access by the trustee of the relevant Trust.

The function is available only if the status of the request is Submitted and the type of request is 3 (request type "There is a business relationship with an express trust or similar legal arrangement")



Trustee Access Request Screen (Review Access Request by Trustee)

To enter the details of the Trustee Access Request Control, the user must fill in the following information:

Field Name	Field Type	Shows up	Mandatory	Remarks
Relevant Trust Name	-	YES	-	Name of relevant Trust
BO Registry ID	-	YES	-	Unique Registration Number in the Register
Request Kind	-	YES	-	Request Type
Request Status	-	YES	-	Request Status
Access Description	-	YES	-	Request description
Submission Date	-	YES	-	Date of submission
Submitted by	-	YES	-	User who submitted the Request
Is Confirmed	Check box YES / NO (check box)	YES	YES	The business relationship is confirmed
Review Notes	Text field	YES	NO	Comments

3.8.2. Complete Access Request Check by the Trustee of the relevant Trust (Complete Review)

This function concerns the completion of the process of checking an Access Request by the Trustee of the relevant Trust.

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

The function is only available if the status of the request is Submitted and the request requires verification by Trustee

Once the request is approved, access to the Trust is granted until it is canceled by the Trustee who granted it. This Trust is now accessible by the user who submitted the access request through the "Accessible Trusts" directory.

3.8.3. Cancel Trust Access

This feature is intended to cancel the access to a Trust granted to a user of the system.

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

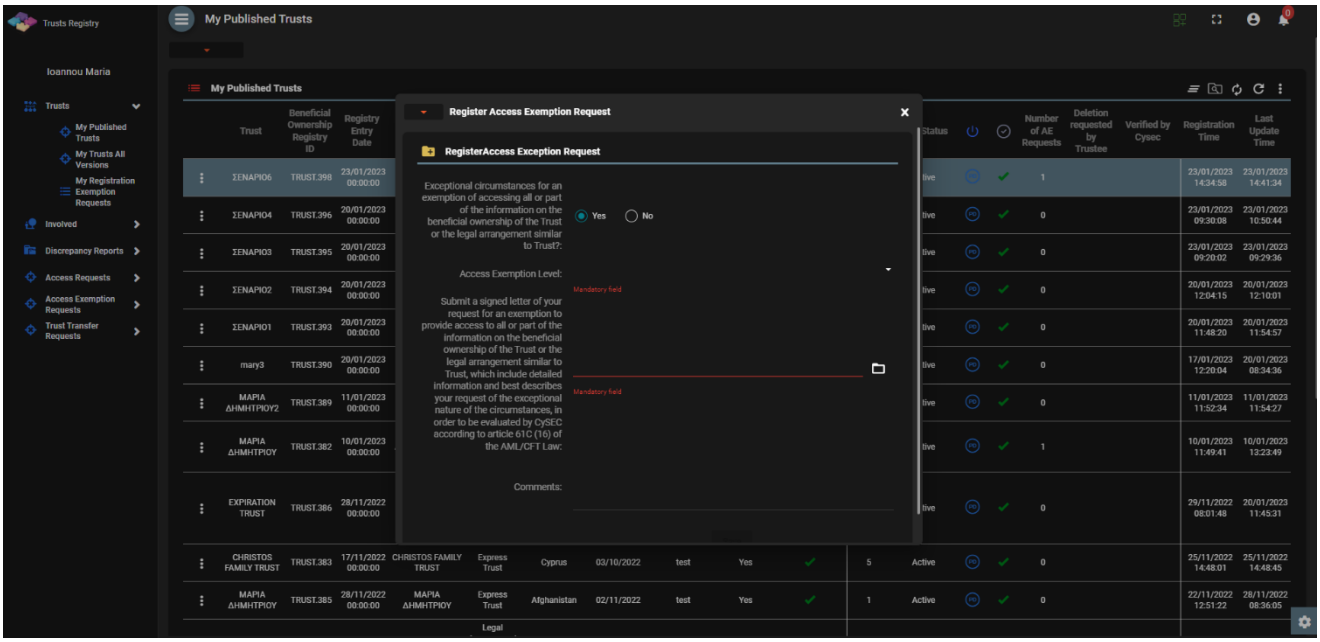
The above function is allowed only to the Trustee who manages the accessible Trust, and only if the request has been approved by the Trustee

Once access to a Trust is revoked, it is no longer accessible through the Accessible Trusts directory.

3.9. Access Exemption Request Management

3.9.1. Register Access Exemption Request

The purpose of this function is to register an Exemption Request for Access for a Trust.



Register Access Exemption Request Screen

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

Field Name	Field Type	Shows up	Mandatory	Remarks
Exceptional circumstances for an exemption of accessing all or part of the	Check box YES / NO (check box)	YES	YES	Confirmation of access exclusion

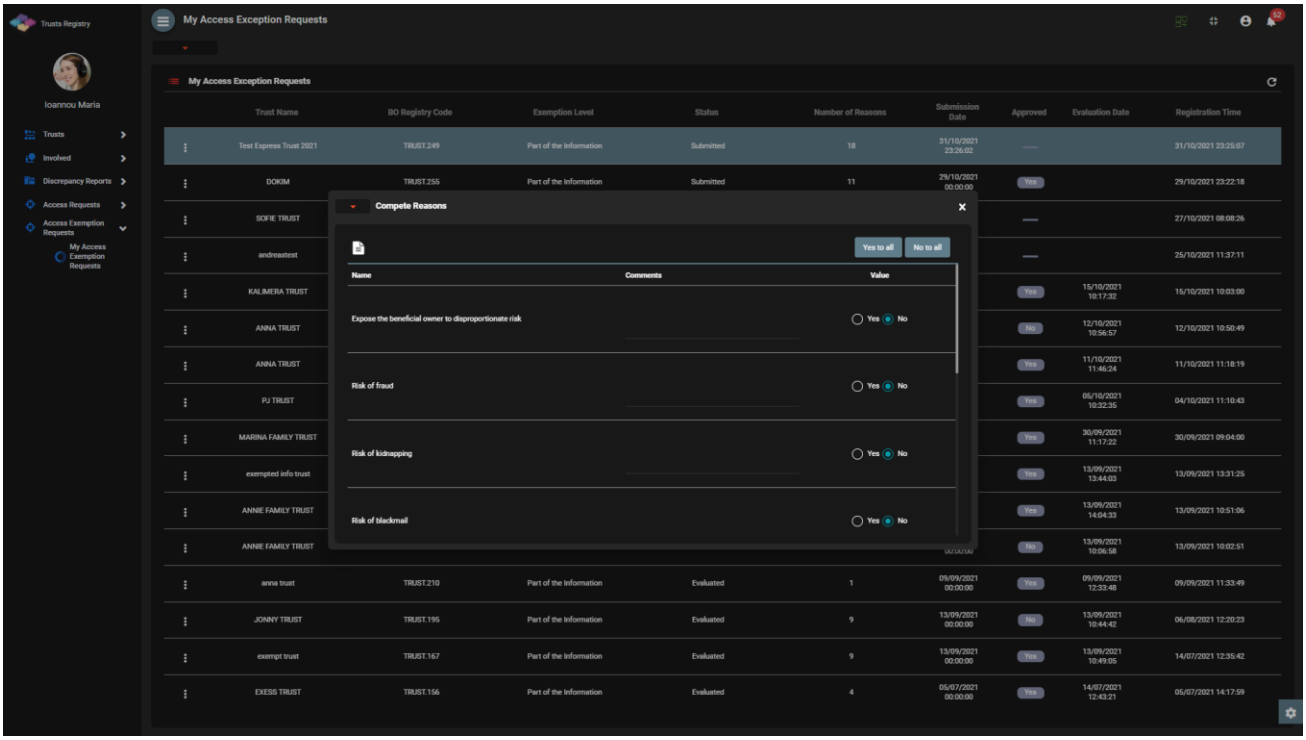
information on the beneficial ownership of the Trust or the legal arrangement similar to the Trust?				*The field only allows a YES value (which is the default value it receives)*
Access Exemption Level	Menu drop menu with prices: a) All of the Information b) Part of the Information	YES	YES	Request description a) Concerning all roles. For example Settlor, trustee, protector, beneficiary or beneficiary class, any other natural person exercising ultimate control. b) Multiple selection of roles for the exemption request from access.
Submit a signed letter of your request for an exemption to provide access to all or part of the information on the beneficial ownership of the Trust or the legal arrangement similar to the Trust, which include detailed information and best describes your request of the exceptional nature of the circumstances, in order to be evaluated by CySEC according to article 61C (16) of the AML / CFT Law	Select file from disk	YES	YES	
Comments	Text field	YES	NO	Comments

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

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

3.9.2. Reasons for Exemption Request

This function concerns the registration / updating of the reasons for which an exemption is requested for a Trust. The user fills in as many reasons as he wants if the reason applies (default value = NO) and any comments at the registration level, and selects the action "Save", having the ability to filter the records based on the role Beneficial Owner as well as to declare bulk YES or NO to all entries displayed in the directory.



Access Exclusion Reason Information Screen

3.9.3. Submit Request for Access Exemption (Submit)

The purpose of this function is to submit an Access Exemption Request from the user who has registered it. When activating the function, the system checks if Exception Reasons have been registered (at least 1). If this is not the case, the system displays an information message, and does not allow the Request to be submitted. Otherwise, the system closes the window and updates the status of the Request to Submitted. It also sends a relevant information 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.

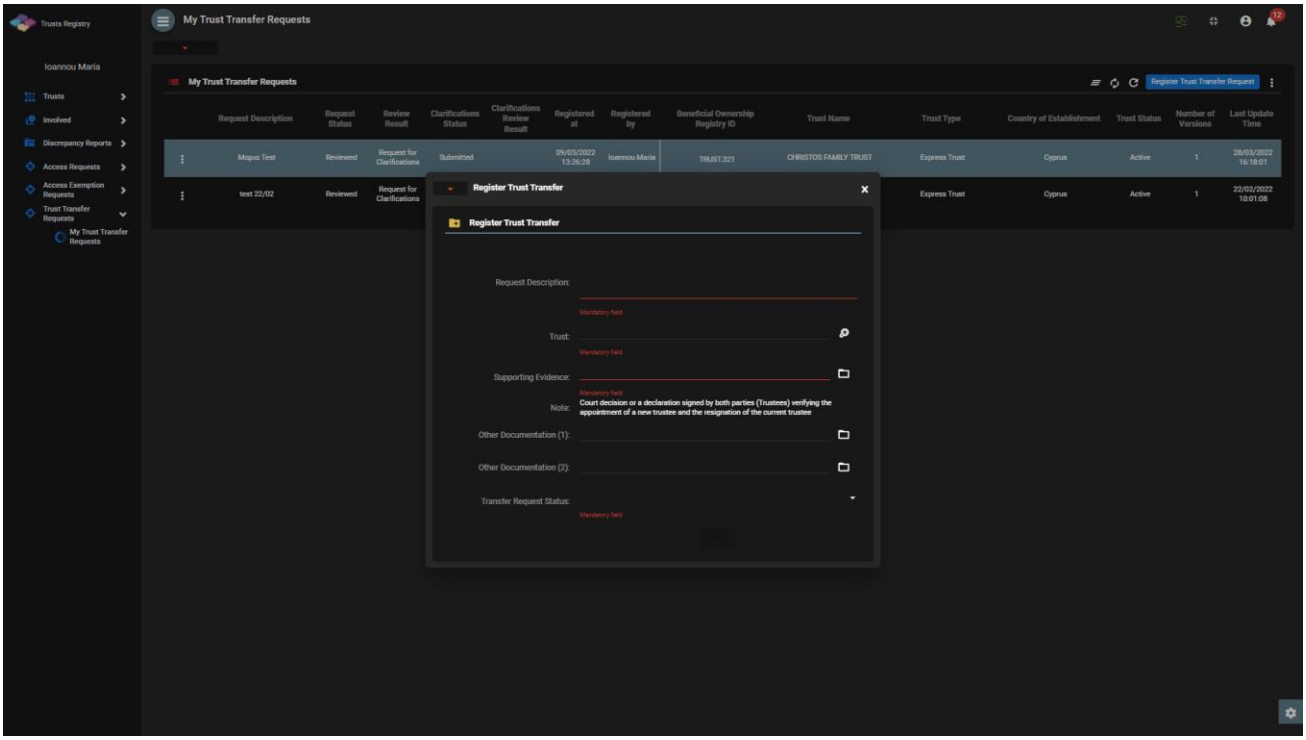
The above operation is allowed only in case the selected Access Exclusion Request is in Draft mode and at least one access exclusion reasons have been declared

The access exclusion request is now accessible from the Cysec Internal User and Cysec Registry Administrator roles for verification through the All Access Exemption Requests directory.

3.10. Trust Transfer Request Management

3.10.1. Register Trust Transfer Request

The purpose of this function is to enter a Transfer Request for a Trust that is active in the Register. Please note that the transfer request is submitted by the new Trustee (who must be an active user of the system).



Register Trust Transfer Request Screen

To enter a Trust Transfer Request, the user must fill in the following information:

Field Name	Field Type	Shows up	Mandatory	Remarks
Request Description	Text field	YES	YES	
Trust	A pop up screen opens for the selection of Trust from the active ones in the Registry	YES	YES	
Supporting Evidence	Select file from disk	YES	YES	
Note	Update message «Court decision or a declaration signed by both parties (Trustees) verifying the appointment of a new trustee and the resignation of the current trustee»	YES	-	
Other Documentation (1)	Select file from disk	YES	NO	
Other Documentation (2)	Select file from disk	YES	NO	
Trust Request Status	Menu options (drop down menu) with only the value "Draft"	YES	YES	

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

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

3.10.2. Edit and Delete a Request for Transfer of Trust (Delete)

The Edit function refers to the change of a Trust Transfer Request, which is in Draft mode.

To change the details of a Trust Transfer Request, the user can change the following details:

Field Name	Field Type	Shows up	Mandatory	Remarks
Request Description	Text field	YES	NO	
Trust	A pop up screen opens for the selection of Trust from the active ones in the Registry	YES	NO	
Supporting Evidence	Select file from disk	YES	NO	
Note	Update message «Court decision or a declaration signed by both parties (Trustees) verifying the appointment of a new trustee and the resignation of the current trustee»	YES	-	
Other Documentation (1)	Select file from disk	YES	NO	
Other Documentation (2)	Select file from disk	YES	NO	
Trust Request Status	Menu options (drop down menu) with only the value "Draft"	YES	NO	

The Delete function also refers to the deletion of a Trust Transfer Request, which is in Draft mode. When this action is enabled, the system deletes the request after displaying an action confirmation message.

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

The operation concerns "physical" deletion of data.

The above operation is allowed only in case the selected Access Exclusion Request is in Draft mode and at least one access exclusion reasons have been declared

3.10.3. Submit Request for Transfer of Trust (Submit)

The purpose of this function is to submit a Request for Transfer of Trust from the user who has registered it, to the Cyprus Securities and Exchange Commission. When the function is activated, the system first checks if there is another transfer request in progress for the selected Trust. If this is the case, the system properly informs the user and cancels the action. In case there is no ongoing request, the system 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.

It is noted that once the request is approved by the Cyprus Securities and Exchange Commission, the Trust will now be under the management of the new Trustee. After the approval of the transfer request the system creates a new trust version (state = "Draft"). In this new version, all the Beneficial Owner relations with Natural Persons, Legal Entities and Secondary Trusts are deleted so as to be defined again by the management of the new Trustee. Before accepting or rejecting a Request, the Cyprus Securities and Exchange Commission may request additional clarifications (see section 3.10.4).

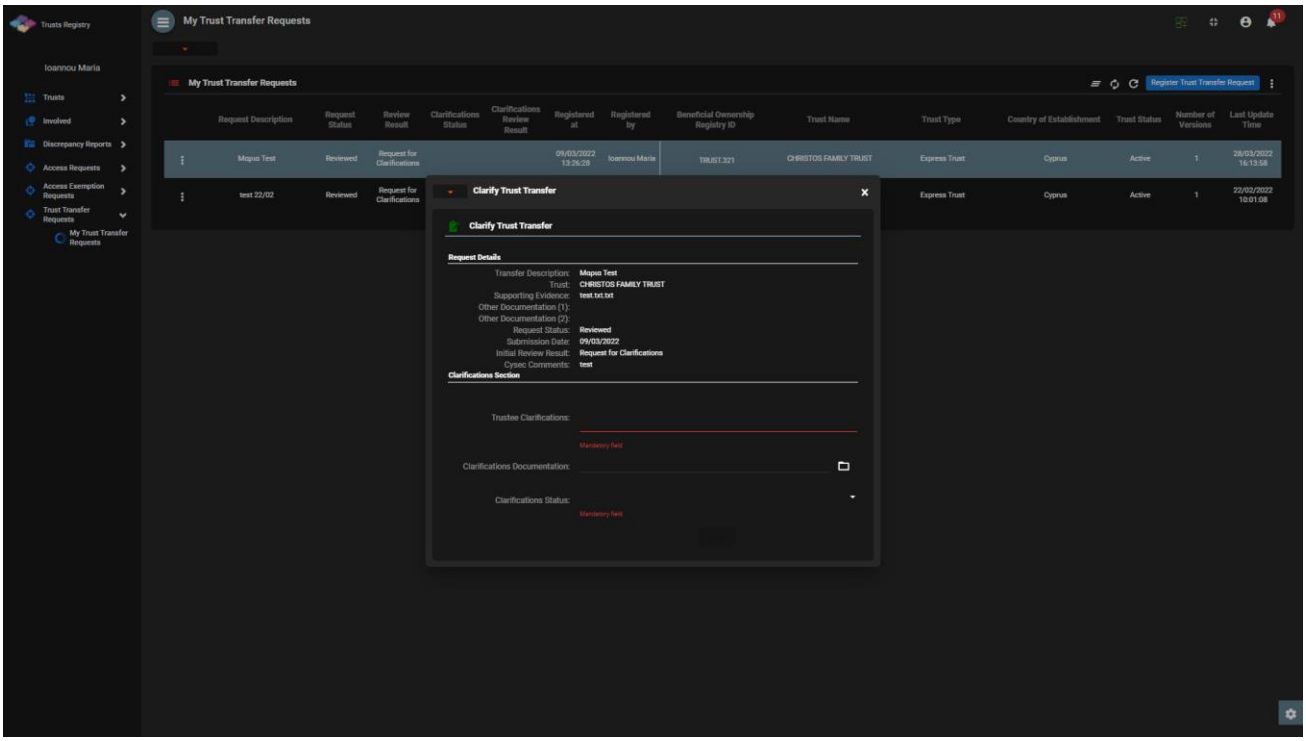
The operation is performed in the background and has no screen.

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

The request is now accessible from the Cysec Internal User and Cysec Registry Administrator roles for verification through the Trust Transfer Requests directory.

3.10.4. Provide Clarifications

The purpose of this function is to provide clarifications requested by the Cyprus Securities and Exchange Commission regarding a submitted Referral Transfer Request.



Provide Clarifications Display Clarification Screen

To provide clarifications regarding a Trust Transfer Request, the user should fill in the following information:

Field Name	Field Type	Shows up	Mandatory	Remarks
Request Description	Field of informative character	-	-	

Trust	Field of informative character	-	-	
Supporting Evidence	Field of informative character	-	-	
Other Documentation (1)	Field of informative character	-	-	
Other Documentation (2)	Field of informative character	-	-	
Request Status	Field of informative character	-	-	
Submission Date	Field of informative character	-	-	
Initial Review Result	Field of informative character	-	-	
Cysec Comments	Field of informative character	-	-	
Trustee Clarifications	Text field	YES	YES	
Clarifications Documentation	Select file from disk	YES	NO	
Clarifications Status	Menu options (drop down menu) with only the value "Draft"	YES	YES	

The above card and function is also used in case the user wishes to update the provided clarifications (edit form).

3.10.5. Submit Clarifications

The purpose of this function is to submit the provided clarifications regarding a Trust Transfer Request from the user who has registered it, to the Hellenic Capital Market Commission. When the function is activated, it changes the status of the Request clarifications to Submitted and sends a relevant informational notification to all users who have the role of Cysec Internal User or Cysec Registry Administrator.

It is noted that if after the clarifications the request is approved by the Hellenic Capital Market Commission, the Trust will now be under the management of the new Trustee. The Commission may not request further clarification on the request.

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

The above operation is allowed only in case the selected Trust Transfer Request has a Draft Clarification status

3.11. Overdue Registration of Trust Information

Each Trustee should be aware that if the Trust itself or changes to its details have been entered out of time, then the Trust Register will provide a relevant mark for the Trust concerned. Overdue

registration exists in the following cases:

- In the following cases, the ECC gives 15 days:
    - From the date of appointment of the trustee, to register the trust in the Register and the registration is overdue.
    - From the date of entering into a business relationship on behalf of the trust in the Republic (when the trustee is established or resides outside the European Union) and the registration is overdue.
    - From the date of acquisition of real estate on behalf of the trust in the Republic (when the trustee is established or resides outside the European Union) and the registration is overdue.
- In the event that the ECC gives 15 days from the date on which any change in the information disclosed during the registration of the trust in the Register,) and the change notice is overdue.
- In the case of existing trusts, ie trusts that were created before the entry into force of the Directive and for which will be given e.g. the deadline of up to 6 months to be registered in the Register and their registration is overdue.