

## Q & A transition IKB (Version 1.1, Final)

### Frequently asked questions

In July 2017 the Policy Rules for the Deposit Guarantee scheme, the new manual on data delivery (3.0), the Data Delivery Agreement and Formal Logical Data Model were introduced. This requires banks to make structural changes to their procedures and systems to comply with the new regulations.

Since the introduction, De Nederlandsche Bank (DNB) has received questions and comments concerning the transition to SCV (IKB) based data delivery. These might be relevant for all banks.

This document sets out to provide a handy overview and to inform banks of the questions and comments DNB has received, with answers.

We would welcome any questions or comments not represented in this Q & A via our mailbox: [dgs@dnb.nl](mailto:dgs@dnb.nl)

Terms used:

Manual = DGS Data Delivery Manual 3.0

DDA = Data Delivery Agreement

FLDM = Formal Logical Data Model

SCV = Single Customer View (IKB in Dutch)

IKB = Individueel Klantbeeld (SCV in English)

Golden Triangle = Combination of data that uniquely identifies a depositor

EER = Europese Economische Ruimte (EEA in English)

EEA = European Economic Area (EER in Dutch)

EUR = Euro (Currency)

Version	Date	Comment	Author(s)
1.0	29 March 2018	Initial version (released)	Marcel van der Aar
1.0.1		Added 19 questions and clarified the content of several existing questions.	Marcel van der Aar
1.0.2		Grouped all questions in a more logical structure.	Marcel van der Aar
1.1	12 June 2018	Reviewed and approved version (Released)	Marcel van der Aar

## Q & A

### 1. General information

#### 1.1 Q: Where can I find more detailed information on the Deposit Guarantee scheme, the manual on Data Delivery, the Data Delivery Agreement (DDA) or the Formal Logical Data Model (FLDM)?

A: Information in the **English** language:

General information on the Deposit Guarantee Scheme:

<https://www.dnb.nl/en/resolution/depositogarantiestelsel/index.jsp>

Single Customer View (Individueel klantbeeld), legislation and policy rules and DGS Data Delivery Manual (3.0):

<https://www.dnb.nl/en/resolution/depositogarantiestelsel/single-customer-view/index.jsp>

All technical information including Data Delivery Agreement, Formal Logical Data Model and Data Delivery via Logius Digiport:

<https://www.dnb.nl/en/resolution/depositogarantiestelsel/single-customer-view/specificatie-van-de-gegevenslevering/index.jsp>

Information on DLR (Digitaal Loket Rapportages) for submitting DGS reports to DNB:

<https://www.dnb.nl/en/statistics/digital-reporting-portal/supervisory-reports/banken/index.jsp>

A: Information in the **Dutch** language:

General information on the Deposit Guarantee Scheme:

<https://www.dnb.nl/resolutie/depositogarantiestelsel/index.jsp>

Single Customer View (Individueel klantbeeld), legislation and policy rules and DGS Data Delivery Manual (3.0):

<https://www.dnb.nl/resolutie/depositogarantiestelsel/individueel-klantbeeld/index.jsp>

All technical information including Data Delivery Agreement, Formal Logical Data Model and Data Delivery via Logius Digiport is exclusively available in the English language. For the link, see above under 'English'.

Information on DLR (Digitaal Loket Rapportages) for submitting DGS reports to DNB:

<https://www.dnb.nl/statistiek/digitaal-loket-rapportages/toezicht-rapportages/banken/index.jsp>

## **2. DGS specific questions**

In this section you will find all questions related to the DGS and the interpretation of the requirements in the policy rule and manual.

- 2.1 Q: Information in the DGS Data Delivery Manual (3.0) differs from information in the DDA and/or FLDM.  
For instance: entities, fields and values listed in the manual are not consistent with those in the FLDM.**

A: Because the manual was published before the DDA/FLDM, there are differences between the two. Where the manual differs from the DDA/FLDM, the DDA/FLDM is **leading**. We are planning to update the manual to exactly reflect the DDA/FLDM.

- 2.2 Q: If the transition to SCV (IKB) based data delivery will involve phasing out systems used for complying with DGS 2.0, will we still have to be able to make a DGS 2.0 data delivery if we complete the transition before the 1-1-2019 deadline?**

A: The policy rule states that banks are required to be able to make DGS 2.0 data deliveries until the 1-1-2019 deadline. However, DNB does not intend to request DGS 2.0 data deliveries in 2018, unless the situation demands it.

- 2.3 Q: In the table in paragraph 2.4 on page 15 of the manual it is stated that a field 'license number' should be provided. However, in the FLDM in the entity 'bank' there is no such field.**

A: For this the RIAD code should be provided in the field 'bank identifier' in entity 'bank' in the FLDM. We will correct this in the next version of the manual.

- 2.4 Q: In the DDA in the table on page 8, the bank identifier should be the RIAD code. What is a RIAD code?**

A: This is the bank's license number. It is analogous to a bank's MFI ID as can be found in the database of the ECB: <https://mfi-assets.ecb.int/queryMfiD>

- 2.5 Q: In the table on page 18 of the manual, the comment for the field 'Date of birth' states: "Enter a valid date from the past in YYYYMMDD". However, according to the DDA/FLDM the notation should be 'YYYY-MM-DD' (with hyphen). Which is correct?**

A: 'YYYY-MM-DD' (with hyphen) is correct. We will correct this in the next version of the manual.

- 2.6 Q: In the FLDM, Domain 'date with exceptions' states: "All possible dates as of 0001-01-01".  
However, business rule 'tmc0003' states: "The date of birth must be prior than the reporting reference date and later than 1900-01-01 in order to be a valid date of birth."  
Isn't this an inconsistency?**

A: It is true the domain *accepts* possible dates as of 0001-01-01, but dates before 1900-01-01 are not *allowed* in case of birth dates.

- 2.7 Q: How do we have to include natural persons of whom it is unclear if they are a minor or not? In some cases birth dates are unclear. For instance if bankruptcy is declared on a bank on July 15<sup>th</sup> 2018, and the birth date we have available for a depositor is 2000-07-00 how do we include this depositor in the SCV (IKB) files?**

A: While the FLDM *accepts* dates like 2000-07-00 or even 2000-00-00, it should be avoided if at all possible. If DNB concludes that an exact birthdate is omitted for too many depositors, (which is a sign of insufficient data-quality), DNB will request you take the appropriate steps to acquire the missing information. It is essential that in case of a payout situation, no payments are made directly to minors. So in the exceptional case the maturity of a person is in the balance, mark the depositor as 'unqualified\_depositor' in the SCV (IKB) files, and include representation. Example: A person whose birthdate is registered as 2000-00-00 is considered a minor by the FLDM until January 1<sup>st</sup> 2019.

- 2.8 Q: Dutch minors don't dispose of an identification document until they are 14 years of age, so how should we identify them in the SCV (IKB) files?**

A: Even if Dutch minors below the age of 14 don't dispose of an identification document, they will have been issued a BSN. It is compulsory to include the BSN for all Dutch residents.

- 2.9 Q: In DNB's data model there's no direct link between representative and bank account. How should we report the following case: 1 underage customer has 2 bank accounts; for account 1 the mother is the representative, for account 2 the father?**

A: There only needs to be a direct link between the representative(s) and the depositor. We do not acknowledge the situation where one parent can perform actions on only one specific account. By law both parents are fully authorized to act on behalf of their child, so under the DGS they are allowed to claim for both accounts from this example. (Except if a parent has lost custody of their child(ren), but in that case that parent isn't allowed to be marked as 'representative' for their child(ren) at all.)

- 2.10 Q: How do we interpret field 'type of representation competence' in entity 'depositor representation', especially in case of natural person representation. For instance, are parents of a minor jointly authorised or each fully authorised?**

A: In principle representatives representing a natural person (Minors, legally incapacitated individuals etc.) are almost always fully authorised. For instance, for a minor either the first parent or the second can claim for their child. There is no need for both parents to claim. Representation competence is mostly applicable to representation of legal entities (Niet natuurlijke personen met rechtspersoonlijkheid).

- 2.11 Q: The manual states that ideally, representatives can only be natural persons. But for instance, what if a legally incapacitated person is not represented by a single legal guardian, but an organisation of legal guardians?**

A: In exceptional cases such as the one described above, the organisation can be included in the files as representative. In a payout situation, the claim is going to be processed manually. As a general rule, because manual processing will prohibit us from meeting the 7 working day payout deadline, as little legal entities or other organizational forms as possible should be included as representative.

- 2.12 Q: The policy rule states in article 3(4) "In creating a Single Customer View, a bank does not have to include any deposits held by natural persons or micro, small or medium-sized enterprises that would qualify as eligible deposits if the deposit had not been made through a branch located in a country other than a Member State, as referred to in Article 29.01(1)(a) of the Bbpm." But in article 7 it says: "For the purposes of preparing and updating a resolution plan, a bank must submit, among other things, a detailed description of the components of the deposits held with this bank, and a bank is able to produce a list of deposits as referred to in Article 3(4)". Isn't this inconsistent?**

A: It is very important here to distinguish between what needs to be included in the SCV (IKB) files and what needs to be reported for resolution purposes.

**- For SCV (IKB) files.**

The Dutch DGS exclusively covers deposits held within the EEA. (Head office, branches in other EEA member states or deposits held through the so called "Passport construction" in other EEA member states.)

From this follows that that only deposits from these three situations should be included in the files. Deposits held at branches outside of the EEA should not be included. (See also question 2.24)

**- Reporting for resolution purposes.**

This is where article 7b specifically applies. Contrary to the SCV file, for resolution purposes we do need to know the deposits held outside the EEA. So they do not need to be included in the SCV (IKB) files, but they do need to be reported for resolution purposes on our request.

- 2.13 Q: If a depositor is deceased, the heirs are entered as signatories. Should the customer be marked as 'deceased' in this case and the signatories treated as representatives?**

A: All deceased depositors need to be marked as deceased in the SCV (IKB) files. ('OVERLEDEN' in field 'vital status' in the FLDM)

A depositor that is marked in the SCV (IKB) files as 'OVERLEDEN' is effectively blocked for payout until the signatories have properly identified themselves and proven by means of death certificate or 'verklaring van erfrecht' that they are authorised to claim under DGS for the deceased. If the verifiably authorised signatories are known they can be provided in the 'representative' part of the SCV (IKB) files.

**2.14 Q: According to the FLDM, for example the following data need to be included in individual fields:**

- 'initials'
- 'birthname'
- 'affix of birthname'
- 'lastname'
- 'affix of lastname'

**What if in the administration of our bank this information is not kept in individual fields?**

**Can we for instance include the entire name in a single field?**

A: No. To be able to meet the 7 workday payout deadline and for evaluation, processing, communication and other purposes it is important that all banks uniformly include this information in individual fields.

**2.15 Q: Can an exception be made for our bank to deviate from the FLDM?**

**For instance when our bank doesn't have the data required for a mandatory field can we agree with DNB that we don't have to include the data for this field?**

A: No. Unfortunately it is not possible to offer banks individual solutions. To be able to meet the 7 workday payout deadline, all banks must be fully compliant with the FLDM in the same way.

Changes to the FLDM can of course be suggested through the NVB (Nederlandse Vereniging van Banken), but any agreed change would be for all banks collectively.

**2.16 Q: In the FLDM, why is the value 'BANK\_RELATIE\_NUMMER' allowed in field 'type of natural person identifier' in entity 'natural person identification'?**

**This number isn't issued by any government or official instance, and this field is the most important one for uniquely identifying a depositor's SCV (IKB).**

**(Note! Not to be confused with question 4.2)**

A: See footnote 8 on page 21 and the note on page 89 of the manual. When a bank can guarantee (subject to confirmation by the external auditor, see question 2.17) that each unique depositor has been issued a single, unique bank relation number across the entire bank's administration, it is allowed to use this relation number for the determination of the 'golden triangle' for the SCV (IKB).

**2.17 Q: If we want to use our bank's bank relation number as unique identifier for a customer's SCV (IKB) is the external auditor expected to perform an audit on this before we can use bank relation number as identifier type? Or is the review by Internal Audit also sufficient?**

A: No. It is the external auditor that has to make this assessment.

**2.18 Q: If we decide to use our bank's relation number as unique identifier for a customer's SCV (IKB) (subject to confirmation by the external auditor), are we required to use it for all customers (natural and non-natural)?**

A: Yes. If you decide to use the bank relation number as unique identifier for customers, you are required to do this for all depositors, no exceptions. A validation rule for this is included in the FLDM. (omc0010)

**2.19 Q: If we decide to use our bank's relation number as unique identifier for a customer's SCV (IKB) (subject to confirmation by the external auditor), does this mean we don't need to report TIN's and/or trade register numbers? (with the exception of Dutch natural persons, for which at all times a BSN is required)**

A: BSN's are indeed mandatory for Dutch residents so these have to be included at all times. However if you use the bank relation number as unique identifier, but the TIN's and/or trade register numbers are available, we ask you (even if not mandatory) to include them always, because the more information we have on depositors and representatives the easier it makes it for us to communicate with them and/or rule out any inconsistencies or mistakes.

**2.20 Q: In the FLDM, the field 'legal capacity' in entity 'non natural person' needs to be set to 'ZONDER\_RECHTSPERSOONLIJKHEID' in case of non-natural persons without legal personality.**

**Are for example 'Europees Economisch SamenwerkingsVerband' (EESV) and 'Societas Europaea (SE)' non-natural persons without legal personality?**

A: Unfortunately it is not possible for us to be exhaustive in our documentation on all organizational structures used within the EEA. The example of the EESV mentioned above proves this. An EESV registered in the Netherlands has legal personality, but in some other EEA member states this organizational form **hasn't** got legal personality! Ultimately it is the bank that will have to uniquely identify for each non-natural person whether it has legal personality or not, or whether or not it is covered under the DGS. (**Note!** See question 2.36 for how to include non-natural persons without legal personality in the SCV (IKB) files).

**2.21 Q: Can DNB give a ruling on whether one of our products is eligible for DGS or not?**

A: For quite some time banks have had the legal obligation to inform their customers for each product on whether or not it is eligible for DGS (informatieplicht). Also there is the obligation to provide this information in the product's terms and conditions sheet. Therefore this information should be already available within your bank. In exceptional cases have the legal department of your bank contact DNB. See also page 31 of the manual.



**2.22 Q: The manual states that in case of a house sale the depositor has extra coverage for a three month period of EUR 500.000 on top of the regular coverage of EUR 100.000. But the manual also states that bank deposits for a house are not eligible for the DGS. Isn't that inconsistent?**

A: It is very important to understand that these are two unrelated aspects.

**- Bankspaardeposito 'eigen woning'.**

This is a type of mortgage for which a bank deposit is built up over the runtime of the mortgage. This type of deposit is not eligible for payout under DGS. In case of bankruptcy, the balance will be set off against the mortgage debt, and not be paid out to the depositor. Only in the unlikely event the deposit has a higher balance than the mortgage debt, the difference is eligible and will be paid out.

**- Temporary High Balance (THB)**

When a house is sold, usually a large sum of money is deposited in the beneficiary account of the notary which, after the transaction is concluded will be transferred into the account of the seller. When this is the case at time of bankruptcy, the depositor is eligible for the extra EUR 500.000 coverage as described above.

**2.23 Q: How do we deal with non-natural persons without Chamber of Commerce (Kamer van Koophandel) registration, for example Church denominations (kerkgenootschappen)?**

A: For the 'informatieplicht' introduced in 2016, legal entities exempt from CoC (KvK) registration are obliged to provide an RSIN. This can then be included in the SCV (IKB) files.

**2.24 Q: It is unclear to us whether we have to include depositors from outside the EEA in the \*.CSV files or not. What are the guidelines?**

A: The decisive factor here for inclusion into the \*.CSV files is not the depositor but the deposit. When the deposit is held within the EEA (and therefore is eligible for the DGS), but the depositor resides outside of the EEA, the depositor needs to be included in the \*.CSV files. (See also question 2.12).

**2.25 Q: Do we only have to include accounts eligible for DGS in the SCV (IKB) files?**

A: No. For each depositor, the SCV (IKB) must contain a list of **all** deposits held by the depositor (eligible or not) and markings to show whether the deposit and depositor are eligible under the DGS. In case of a DGS effectuation DNB needs to be able to communicate with the bank's customers on accounts that are not eligible for DGS as well, so this information is required.

**2.26 Q: The policy rule states we have to include all 'deposits' in the SCV (IKB) files. What exactly qualifies as a 'deposit'?**

A: The definition of 'deposit' can be found in Section 1:1 of the Wft (Wet Financiële toezicht):

"A credit that is formed by funds in an account or that temporarily arises out of normal bank transactions, and that a bank must repay pursuant to the applicable statutory and contractual conditions, as well as debts represented by debt instruments issued by a bank, with the exception of bonds that satisfy the conditions stated in Article 22(4) of the UCITS Directive."

**2.27 Q: Do we only have to include accounts with positive balances in the SCV (IKB) files?**

A: No. For each depositor, the SCV (IKB) must contain a list of **all** deposits held by the depositor, whether it has a positive balance, zero balance or negative balance. In case of a DGS effectuation DNB needs to be able to communicate with the bank's customers on accounts that have a zero- or negative balance as well, so this information is required.

**2.28 Q: We carry a product called 'loan payment accounts'. These are used to settle loan payments. Normally these accounts have a zero balance. If there's a balance in this account, it is only for example when a settling was not done yet or when a customer paid more than was required. Should we report loan payment accounts in the DGS file?**

A: All these accounts need to be reported, because whenever there's a deposit in such an account at the moment of bankruptcy, this deposit is covered by the DGS. But it is true that in most cases you will be reporting a 'zero' balance. See also the answers to the questions above.

**2.29 Q: Are board members of banks and such covered by the DGS or not? Annex 5 of the manual is not clear on that.**

A: Because they are not explicitly excluded from the DGS in the legislation, this means they are eligible for the DGS.

**2.30 Q: The manual states in paragraph 2.6 on page 33 that deposits can be blocked because they are 'attached'. What does this mean?**

A: This means these deposits are impounded by for example a bailiff.

**2.31 Q: Do we mark the same accounts as 'blocked' in the SCV (IKB) files that are blocked in the bank's administration?**

A: No. Some of the reasons accounts are blocked in the bank's administration are not valid reasons under the DGS. Therefore all accounts in the bank's administration should be matched against the guiding principles on blocking in the manual (See page 33 of the manual). Only the accounts that comply with these guidelines should be marked as 'blocked' in the SCV (IKB) files.

**2.32 Q: Do all accounts marked as blocked in the SCV (IKB) files have to be marked as 'GEEN\_DGS' (not eligible) in entity 'bank account'?**

A: No. Eligibility is only related to the product in general, not to specific accounts. For instance, when a current account is blocked because of a legal dispute, and the dispute is settled, the block is removed, and payment will ensue. The product of 'current account' has been eligible even when the block was in effect for that specific current account. See also page 33 of the manual.

**2.33 Q: If 1 account has 2 or more blockage reasons (for example both 'convicted of money laundering' and 'legal dispute'), how should we report this?**

A: When 1 account has 2 or more blockage reasons, they all need to be reported. This is simply done by including multiple instances of entity 'bank account blockage' for the same bank account in the SCV (IKB) files.

**2.34 Q: Do we have to convert the account balances that are in other currencies than EUR to EUR before adding them to the SCV (IKB) files?**

A: It is very important to distinguish between reporting non-EUR balances in the SCV (IKB) files and reporting non-EUR balances for the quarterly DGS fund and Finrep reports.

**- For the SCV (IKB) files.**

The bank must include each account in the SCV (IKB) files in the currency in which the account is held. In a DGS payout situation, DNB will calculate the covered amount for each depositor in EUR.

**- For the quarterly DGS fund and Finrep reports.**

Here a bank must perform the conversion into EUR itself. The covered amounts in these reports must always be reported in EUR, so balances held in other currencies must be converted. See also question 2.35.

**2.35 Q: Which currency rates should we use to calculate balances that are not in EUR for the quarterly DGS fund and Finrep reporting?**

A: It is mandatory to convert using the reference rates of exchange published by the ECB (ECB reference rates) on the cut-off date (around 4 p.m.).

**Only** if a currency is not featured on the ECB reference list, (for instance the 'Egyptian Pound'), please use another officially recognised, published exchange rate.

The ECB foreign exchange reference rates can be found here: ([https://www.ecb.europa.eu/stats/policy\\_and\\_exchange\\_rates/euro\\_referen ce\\_exchange\\_rates/html/index.en.html](https://www.ecb.europa.eu/stats/policy_and_exchange_rates/euro_referen ce_exchange_rates/html/index.en.html))

**2.36 Q: How should non-natural persons that are not legal entities (niet-natuurlijke personen zonder rechtspersoonlijkheid) be included in the SCV (IKB) files? The manual states two possible ways of including these, but is not explicit on how this should be done in the SCV (IKB) files.**

A: Non-natural persons that are not legal entities (niet-natuurlijke personen zonder rechtspersoonlijkheid) can be included in two ways:

**Like a joint account** (This is the default)

- The organization is **not** included as a depositor in entity 'non natural person'.
- The accounts of the organization are **not** marked as 'SAMENWERKINGSVERBAND' in field 'type of third party account' in entity 'bank account'.
- The members, partners or owners of the non-natural person that is not a legal entity **are required** to be included as **depositors**. For each depositor an indication of their respective share of the organisation's account(s) needs to be provided in the SCV (IKB) files in case of uneven ownership.

**Like a 'third party' account** (Only in exceptional cases)

- The organization **is** included as a depositor in entity 'non natural person'.
- The accounts of the organisation **are** marked as 'SAMENWERKINGSVERBAND' in field 'type of third party account' in entity 'bank account'.
- **No** members, partners or owners of the non-natural person that is not a legal entity are delivered as depositors, **for the organisation**.

**Please note!** In case the members, partners or owners have private accounts as well with the defunct bank, they will of course need to be included as depositors in the SCV (IKB) files, **but only for their private accounts**.

All non-natural persons that are not legal entities included as a 'Third Party' need to be processed manually, so this manner is only allowed in case the members, partners or owners are unknown, or there are too many, or ownership changes frequently.

Examples:

- If an organization is delivered as a 'third party' but the accounts are not marked as 'SAMENWERKINGSVERBAND' it will be rejected.
- If an organization is delivered as a depositor in entity 'non natural person' but there are owners also delivered as depositors it will be rejected.
- Etc.

**2.37 Q: Do only minors and other natural persons that are legally incapacitated (handelingsonbekwaam verklaard) have to be marked as 'unqualified\_depositor' in the SCV (IKB) files?**

A: No. Also all legal entities (niet natuurlijk persoon met rechtspersoonlijkheid) need to be marked as 'unqualified\_depositor'. **All** depositors (natural or non-natural) marked as 'unqualified\_depositor' are **required** to have representatives in the SCV (IKB) files.

**2.38 Q: When should we use entity 'natural person identification' and when entity 'identification by document' to specify the identifying information for a party?**

A: Only when a party has a BSN/DigiD can we meet the maximum 7 working-day payout deadline. Therefore it is mandatory to include the BSN for all Dutch residents in entity 'natural person identification'. If in addition to the BSN you have other information available for Dutch residents, (for instance driver's license or passport), you can include this information in entity 'identification by document' *in addition to* the BSN in entity 'natural person identification'. (So you include one or multiple instances of both entities for the same party)

For non-Dutch residents who don't have a BSN, but do have a 'BSN-like' national identifier, or Tax Identification Number (TIN) of their country of residence, you use entity 'natural person identification' as well, in the same manner as described above.

**Only** when you don't have the TIN, national identifier or unique bank relation number available for non-residents (remember, for Dutch residents it is mandatory to include the BSN), entity 'identification by document' will suffice, but is then mandatory.

We are aware of the fact that not all Dutch residents have a BSN, but this is only true for a very small percentage. This should be reflected accordingly in the SCV (IKB) files. If DNB concludes that the BSN is omitted for too many Dutch residents, (which is a sign of insufficient data-quality), DNB will request you take the appropriate steps to acquire the missing information.

**2.39 Q: Do we have to include the identifying details for natural person depositors that have been marked as 'unqualified\_depositor'?**

A: Yes. The same requirements apply as for qualified depositors.

**2.40 Q: Can we use the BSN of a party as 'party identifier'?**

A: No. This is not allowed. No recognisable information may be used as, or be derived from the value in this field. This could mean maintaining a separate registration if you want to secure the data-lineage in your systems, in case you don't apply surrogate keys. We enforce this because it is the only way to guarantee that validation reports we return to banks will contain no personal information. As an alternative you could hash the value (preferably using the MD5 algorithm) and include the hash in the SCV (IKB) files.

**2.41 Q: Can we use the bank account number as 'bank account identifier'?**

A: No. This is not allowed. No recognisable information may be used as, or be derived from the value in this field. This could mean maintaining a separate registration if you want to secure the data-lineage in your systems, in case you don't apply surrogate keys. We enforce this because it is the only way to guarantee that validation reports we return to banks will contain no personal information. As an alternative you could hash the value (preferably using the MD5 algorithm) and include the hash in the SCV (IKB) files.

**2.42 Q: In the FLDM, for resolution purposes it is mandatory to include the enterprise size in entity 'non natural person'. Are for instance associations (verenigingen) and foundations (stichtingen) enterprises?**

A: That depends on the situation. According to the definition, an enterprise is 'any entity engaged in an economic activity, irrespective of its legal form'. It is the economic activity that is the determining factor, not the legal form. In practice, this means that the self-employed, family firms, partnerships and associations or any other entity that is regularly engaged in an economic activity may be considered as enterprises. An economic activity is usually seen as 'the sale of products or services at a given price, on a given/direct market'. So you will have to determine for each non-natural person whether or not it is deploying economic activity. Non-natural persons not deploying economic activity can be included in the SCV (IKB) files with value 'NVT' (not applicable) in field 'enterprise size'.

**2.43 Q: We are unclear on what audit reports need to be created, by the internal and/or external auditor, and when these audit reports should ultimately be submitted to DNB.**

A: Reporting should be as follows:

**Internal auditor**

Annually, the bank's internal audit department issues an opinion of the extent to which the requirements set out in the Policy Rule have been complied with. This report must be shared with DNB as soon as possible after the end of the reporting year. We suggest to do this at the same moment as submitting this report to the external auditor.

**External auditor**

A bank annually instructs an external auditor to review compliance with the requirements set out in the Policy Rule during the reporting year. This engagement is based on ISAE 3402, which not only tests the set-up and existence of the compliance measures (type 1), but also their operating effectiveness (type 2). The report prepared by the external auditor must be shared with DNB within five months after the end of the reporting year.

**Please note!** Over the 2018 reporting year we only expect the ISAE 3402, type 1 report (set-up and existence) as operational effectiveness (type 2) can only be assessed from the reporting over year 2019 and onwards. So starting at the report over year 2019 we expect an ISAE 3402 type 2 report.

**2.44 Q: It is unclear to us whether we should submit the IKB files at the same time as the quarterly reports for the DGS fund. Can you clarify this?**

A:

- DNB will request the SCV (IKB) data delivery once a year (or as often as DNB deems necessary), but the specific moment of delivery will vary. In 2019/2020 the data delivery will be scheduled, later we will sometimes make a request unannounced, so as to ascertain the bank is able to deliver the SCV (IKB) file within the required three days. See paragraph 2.7.1 of the Manual for more information.

- The quarterly reports will have to be submitted at fixed times. See chapter three (specifically paragraph 3.3.1) of the Manual for more details.

**2.45 Q: We have credit card accounts for retail customers. These customers can order extra credit cards for the same account for, for instance family members. Does the information of extra cardholders have to be included in the SCV (IKB) files?**

A: No. In the case of this example, if family members are issued credit cards with access to the credit card account of the depositor, these card holders are not allowed to claim under the DGS in case of bankruptcy. They are not 'representatives' in the sense of the DGS. Only the designated depositor (or depositors in case of a joint account) can claim.

### 3. Questions related to the Data Delivery Agreement (Gegevensleveringsovereenkomst)

In this section you will find all questions related to how to compose the IKB data delivery, and transmission through Logius

#### 3.1 Q: In which format will the IKB data delivery have to be made?

A: The data will have to be delivered in the .CSV file format. See paragraph 2.1 of the DDA for more information.

#### 3.2 Q: Where can I find the DDA (Gegevensleveringsovereenkomst or GLO) in the Dutch language?

A: The DDA is exclusively available in the English language.

#### 3.3 Q: The manual states in paragraph 2.7.1 on page 35 that DNB publishes the public encryption key for the submission process on its website. Where can I find this encryption key?

A: The key is not yet published. It will be published in Q2 '18. This will be communicated through our website.

#### 3.4 Q: Not all entities in the data model are featured from paragraph 2.4.2 onwards in the DDA, so do we have to deliver a .csv file for such an entity? (For example the entity 'blocked bank account').

A: When an entity does not have any attributes of its own it does not have to be delivered as a CSV-file.

#### 3.5 Q: The 'Delivery of data to DNB using Logius Digipoort.pdf' document states that for the data delivery 'Digipoort Grote Berichten FTP 3.0' should be used. However, the Logius website only offers 'Digipoort bestandsuitwisseling FTP v1.6.1' for communication with DNB. Which one should I use?

A: The information on the Logius site reflects the current situation. After the change has been implemented by Logius, the new situation will reflect the situation in our documentation.

- Our Logius-document links to the NDGS (3.0)-situation, which is currently under development.
- The DNB-part on the Logius-site links to the current production-situation which is DGS 2.0.
- DGS 2.0 uses FTP v1.6.1
- DGS 3.0 will use Digipoort Grote Berichten FTP 3.0



**3.6 Q: In the DNB DGS Data delivery Manual 3.0 in paragraph 2.3 (p.14 onwards) a conceptual data model is depicted with the bank as central integrator (fig 4.), (also specifically referred to on p. 15), as an entity type to be delivered. According version 1.0.2 of the DDA (GLO) this entity does not have to be delivered as an \*.CSV file. Which is correct?**

A: Please follow the DDA (GLO). This entity does not have to be delivered as a \*.CSV file. We will correct this in the next version of the Manual.

**3.7 Q: The DDA (GLO) mentions the 'dnbmetadata.xml' file, but is unclear on how this should be delivered. Where can I find this information?**

A: This information can be found in document 'Delivery of data to DNB using Logius Digipoort\_XXXX-XX-XX.pdf'. See the answer to question 1.1 for the location of this document.

**3.8 Q: In document 'Delivery of data to DNB using Logius Digipoort\_XXXX-XX-XX.pdf' in paragraph 1.7 there is an example for AnaCredit and NDGS. Which one should we use?**

A: As document 'Delivery of data to DNB using Logius Digipoort\_XXXX-XX-XX.pdf' is meant to describe multiple services from banks to DNB, we give examples of more than one 'dnbmetadata.xml' file. For DGS (SCV, IKB) purposes, example 'NDGS' should be used.

**3.9 Q: In document 'Delivery of data to DNB using Logius Digipoort\_XXXX-XX-XX.pdf' in paragraph 1.7 there is an example for NDGS. In the element 'file' there is the attribute 'hash'. Which value are we meant to put here?**

A: For the answer please see paragraph 1.4.3 of the same document. Between tags '<<dnbmeta:files>' and '</dnbmeta:files>' the hash of the file in question should be provided for each \*.CSV file in the delivery.

**3.10 Q: From the documentation follows that some \*.CSV files could be empty. In that case this will result in an empty hash. Should we include the tag in question in the export? Because it doesn't validate against the XSD.**

A: Even when these files contain no information, they are not empty. They should at least contain the line with column headers.

**3.11 Q: When a \*.CSV file is 'empty', for instance because our bank doesn't have any blocked bank accounts how does this reflect on the required hash in file dnbmetadata.xml?**

A: Indeed, all files in the DGS data delivery other than the dnbmetadata.xml need to be hashed for checking their integrity upon reception. The hashing method is report type dependent with the default being SHA-256. But as even an 'empty' \*.CSV (like the file 'bank\_account\_blockage.csv' of our example) needs to at least contain the header, a hash can be generated and included in file dnbmetadata.xml. Please see paragraph 2.6.6 of the GLO for more information.

**3.12 Q: When a \*.CSV file is 'empty', for instance because our bank doesn't have any blocked bank accounts, do we report a 'rowcount' of '0' in file dnbmetadata.xml?**

A: Indeed, the dnbmetadata.xml only requires a hash of each file that is required to be submitted. However the rowcount of '0' needs to be reported in the entity\_type\_delivery.csv file. Please note that a rowcount for each entity in the FLDM is required.

**3.13 Q: In the DDA (Version 1.0.2) on page 15, isn't the explanation for 'text field delimiter' incorrect? Shouldn't the word test be between single quotes instead of double quotes?**

A: We have acknowledged this as an error in the DDA, and will be corrected in the next version. It should read:

" (double quotation mark, ASCII number: 34)  
Escape character: \ (backslash, ASCII number: 92)

- Example 1: The string with inverted commas: This is a "test" then becomes "This is a "test"" (the word test is enclosed in inverted commas of ascii numbers: 147 and 148)

- Example 2: The string with double quotation marks: That was an "error" then becomes: "That was an \"error\"" (the word error is enclosed in double quotation marks of ascii numbers: 34)

#### **4. Questions related to the Formal Logical Data Model (Formeel Logisch Data Model)**

In this section you will find all questions on the entities, fields, values and Data types of the Data Model.

- 4.1 Q: In the FLDM the fields 'balance' and 'interest' in entity 'bank account' are of the type 'decimal (16,0)' This type doesn't store decimal values. Wouldn't this mean that you would only be able to report in whole Euro's, and not the cents? Also the field 'participation percentage' has 'decimal (7,0)' as data type, but the description says '6 decimals' Isn't this conflicting information?**

A: The DDA says of 'numeric format' on page 15:

Numeric fields such as amounts, percentages or chances must not contain dots (.) or commas (,). All of these must be entered in whole numbers, i.e. NNNNNNNNNNNN (no leading or trailing zeros, no decimals, no maximum length).

Amounts in euros must be entered in whole euro cents (1000 euros = 100000 euro cents)

Percentages and chances must be entered in millions (5% = 0.05 = 50000)

Negative numbers are preceded by a minus sign (-) Positive numbers are not preceded by a plus sign (+)

The rationale for this is to prevent interpretation issues due to differences in localization settings between sending, re-transmitting and receiving systems.

- 4.2 Q: Following the FLDM, the entities 'representative' and 'depositor' can only be included once per unique depositor/representative. What if our bank has issued multiple bank relation numbers to a single depositor/representative, which one should I provide in the 'representative bank relation number' or 'depositor bank relation number' fields?  
(Note! We are not talking here about the use of bank relation numbers for determining the 'Golden Triangle' for a customer's IKB. For more information on that topic see questions 2.16, 2.17, 2.18 and 2.19)**

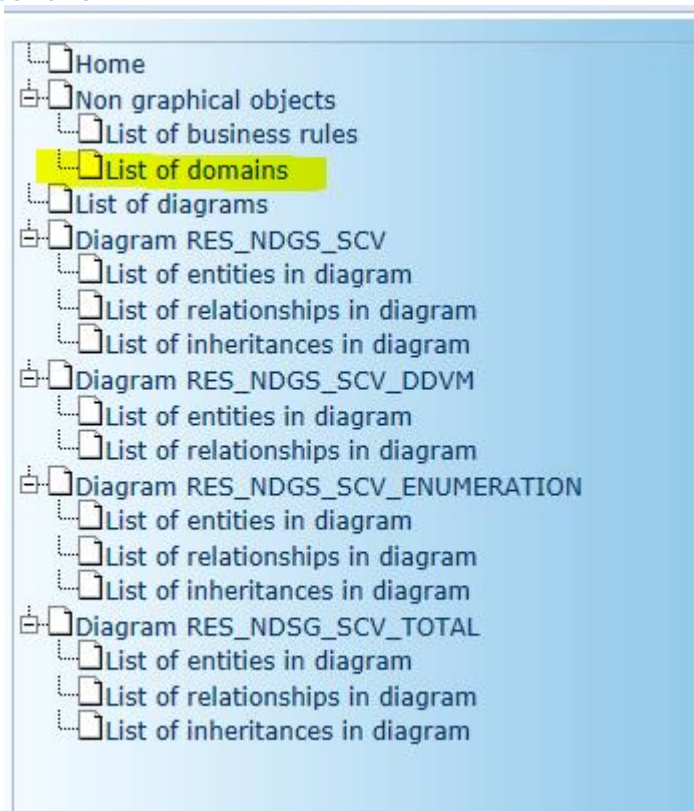
A: Provide the most obvious relation number.

- 4.3 Q: In the FLDM, for several fields the Data Type is 'code' (for example field 'eligible depositor' in entity 'depositor'). Where can I find the allowed values for this data type?**

A: You can find these in document 'Reference\_data\_sets\_<version>.xlsx' available on our website in the same location as the other technical documentation. (see the answer to question 1.1 of this Q & A).

- 4.4 Q: In the FLDM, the Data Type for several fields is not something typical like 'variable characters' or 'integer' but something like 'role\_of\_party' (in entity 'party role'). Where can I find the allowed values for this sort of data type?**

A: These can be found in the HTML version of the FLDM under 'List of domains'



- 4.5 Q: What purpose has the field 'additional details' in entity 'structured address' in the FLDM?**

A: This is to describe unusual domestic situations, like for instance a houseboat without a proper address.

- 4.6 Q: What is the function of entity 'party role' in the FLDM?**

A: In this entity you make the determination whether the party in question is a 'depositor' or 'representative'.

**4.7 Q: In the FLDM all PK's are identically named to the entity to which they are related. For example 'structured address PK' is related to the entity 'structured address'. The only exception is 'SCV PK'. This PK is related to entity 'depositor'. Is this an error?**

A: No. This was done intentionally. As this PK is the essence of the entire SCV process, we decided to give it this particular name.

**4.8 Q: For including in the SCV (IKB) files, if we have multiple phone numbers available for a single customer (especially in case of non-natural persons) which one(s) should we provide in the entity 'party'?**

A: For each party you are able to provide a regular phone number as well as a mobile phone number.  
In case of for example a large corporation, you provide a common number for the depositor, but for the representatives of this non-natural person we would like the telephone numbers that give direct access to the representative in question.

**4.9 Q: For the FLDM, which date has to be provided in field 'reporting reference date' in entity 'bank scv delivery'? The bankruptcy date? The scv creation date?**

A: The FLDM states: "The date on which the delivery dataset has been made".

**4.10 Q: In the FLDM, what is the reason that fields which have a Data Type of 'integer' (for example fields 'rowcount' and 'count\_of\_depositors') have no maximum field length specified?**

A: See the answer to question 4.1. No maximum length is set for this Data Type.

**4.11 Q: In entity 'natural person' we have to include the initials of a party. What do we do when we don't have these initials, but only the full first name(s)?**

A: In that case please extract the first letter of each first name and include them in the 'initials' field.

**4.12 Q: The FLDM states that for field 'account label' in entity 'bank account' you should include 'The bank account product label as it is known to the depositor' This statement is ambiguous, because there are banks that allow customers to make up their own 'account label'. Exactly what information should we include here?**

A: You should include the product name the bank has attached to the specific product, not the label the customer has made up.  
(For instance "XYZ bank savings account" instead of "My new-roof-for-the-garden-shed personal savings account", which label the customer has made up).

**4.13 Q: In the FLDM, field 'participation percentage' in entity 'bank account ownership' allows you to include a participation percentage of 0% or 100%. Isn't this field only used for indicating joint ownership for accounts? So why are we able to indicate either 0% or 100%?**

A: This should indeed not be possible, and will be corrected in the next version of the DDA/FLDM. **Please note!** When the balance of a joint account needs to be distributed evenly across the depositors, simply leave this field empty. Only in case an uneven percentage has been registered in the bank's administration do you indicate the percentage in this field. (For instance a joint account with 2 participants where participant 1 owns 25% of the balance, and participant 2 owns 75%). The percentage for all participants combined for an account should without exception be 100%.

## **5. Questions relating to the Formal Logical Data Model and Data Delivery Agreement that are no longer applicable**

This section contains questions on issues that are no longer applicable because they have been solved in a more recent version of the DDA/FLDM, but we have included them for reference. For the most recent version of the FLDM, see the answer to question 1.1.



- 5.1 Q: In the FLDM, in the entity 'party' in the field 'identifier indicator', the Data Type is 'Variable characters (13)' while the values defined are 21 and 24 characters in length. ('party\_with\_identifier' and 'party\_without\_identifier'). Isn't this inconsistent?**

A: You are using an obsolete version of the FLDM. We have acknowledged this as an error in the FLDM and it was corrected as of version 1.0.2. The field length was extended to 24 positions.

- 5.2 Q: In the FLDM, business rule omc0031 references file 'ndgs\_scv.xml'. However, the DDA mentions 'dnbmetadata.xml'. Which one is correct?**

A: You are using an obsolete version of the FLDM. 'dnbmetadata.xml' is correct, and this was corrected as of version 1.0.2 of the DDA\FLDM.

- 5.3 Q: Footnote 22 in appendix A of the DDA states: "A list of all blocking and signaling validation rules is published on the DNB website in xls format as well" Where can I find this document?**

A: You are using an obsolete version of the DDA. As the GLO is already exhaustive on all business rules, and keeping the same information in two different locations would introduce the possibility for inconsistencies we have come back on this statement. The footnote was deleted as of version 1.0.2 of the DDA.

- 5.4 Q: In paragraphs 4.1, 4.2 and 4.3 on pages 32 and 33 of the DDA, there are several incorrect links or the links link to incorrect files. Where can I find the correct links?**

A: You are using an obsolete version of the DDA. The information was updated as of version 1.0.2.

- 5.5 Q: In the FLDM, field 'type of representation competence' in entity 'depositor representation' is not mandatory. How are we going to determine whether a representative is authorised to act on his own or not, if this information is not provided?**

A: You are using an obsolete version of the FLDM. The field was made 'mandatory' as of version 1.0.2 of the FLDM.

- 5.6 Q: In the FLDM, the eligibility of a bank account is determined in the entity 'bank account'. This would enable the situation where for a specific 'type of bankaccount'/'account label' combination, a bank could say 'eligible' for one instance, and 'not eligible' for the next. Don't we need to ensure that for each specific 'type of bankaccount' / 'account label' combination all instances are either 'eligible' or 'not eligible'?**

A: You are using an obsolete version of the FLDM. A validation rule was introduced as of version 1.0.2 of the FLDM to prohibit this.

- 5.7 Q: In the FLDM in entities 'bank account' and 'non natural person' several fields have Data Type 'variable characters' so not all special characters (like diacritics) would be accepted for these fields where this should be possible.  
For example branches in Turkey or Eastern Europe almost always have to deal with diacritics in their data.**

A: You are using an obsolete version of the FLDM. The Data Type of these fields was changed to 'Variable Multibyte' as of version 1.0.2 of the FLDM.

- 5.8 Q: In the FLDM, field 'document number' in entity 'identification by document' is not mandatory. How are we going to uniquely identify the depositor if this information is not provided?**

A: You are using an obsolete version of the FLDM. The field was made 'mandatory' as of version 1.0.2 of the FLDM.

- 5.9 Q: As under the DGS a natural person is eligible without exception, why in the FLDM are we able to mark natural persons as 'ineligible'? This possibility should only exist for non-natural persons.**

A: You are using an obsolete version of the FLDM. A validation rule was introduced as of version 1.0.2 of the FLDM to prohibit this.

- 5.10 Q: In the FLDM included in entity 'qualified depositor representation' are the fields 'deb party identifier' and 'deb role of party'. Shouldn't this be 'dep party identifier' and 'dep role of party' (for 'Depositor')?**

A: You are using an obsolete version of the FLDM. The field names were changed as of version 1.0.2 of the FLDM.

- 5.11 Q: In the DDA in paragraph 2.5 in the table on page 21 there are two paragraph errors. What was the intended text for these two entries?**

A: You are using an obsolete version of the DDA. The two entries should read: "Paragraph 1.3.1/1.4.9 in document "Delivery of data to DNB using Logius Digipoort\_<date><id>.pdf".  
This was corrected as of version 1.0.2 of the DDA.

- 5.12 Q: In the DDA in paragraph 4.3 on page 33 there is a reference to a file that is not consistent with the file on the DNB website: (Reference\_metadata\_sets\_20170911\_v1.0.xlsx) Which is the correct version?**

A: You are using an obsolete version of the DDA. The reference to this file was corrected as of version 1.0.2 of the DDA.