

# MiFID II Data Collation

This document provides a summary of MiFID II Transaction Reporting information needed from shareholders/employees (person) in order to provide their national identifiers and codes. The information and tables below are subject to change, though reflect requirements as at April 2017.

## IDENTIFICATION OF PRIMARY NATIONALITY

1. A person shall be identified in a Transaction Report using the two letter country code of their primary nationality, followed by the national client identifier and its code (details of the codes are shown in the tables below).
2. The national client identifier referred to above shall be assigned in accordance with the priority levels (shown in table 2) using the highest priority identifier that a person has.
3. Where a person is a national of more than one European Economic Area (EEA) country, the country code of the first nationality when sorted alphabetically shall be used. Where a person has a non-EEA nationality, the highest priority identifier in accordance with the field referring to 'all other countries' shall be used. Where a person has EEA and non-EEA nationality, the country code of the EEA nationality and the highest priority identifier of that nationality shall be used.
4. Where the identifier refers to CONCAT, the person shall be identified using the concatenation of the following elements in the following order:
  - (i) the date of birth of the person;
  - (ii) the first five characters of the first name;
  - (iii) the first five characters of the surname.

The priority of the codes must be strictly followed for each jurisdiction. A combination of the name and date of birth i.e. CONCAT code, should not be used as a default identifier and should never be used for those countries that according to the table have not chosen the CONCAT code as an identifier in any of the three priority possibilities. Where reporting is required, this information must be provided from 3 January 2018 (there is no phased approach).

## MiFID II CUSTOMER DATA

All channels including web portals and paper forms will be modified to capture reportable customer data and data fields include:

**First name(s)**

**Surname**

**Date of birth**

**Nationality** (or nationalities if relevant)

**National identifier** (and if needed its classification so that the relevant code can be determined)

As an example of how this information will be reported, David Stefan decides to sell his shares. He has Australian and Romanian nationalities and his date of birth is 8 May 1952.

- For Transaction Reporting purposes EEA nationality takes priority and therefore the Romanian National Identification Number (Cod Numeric Personal) should be used.
- The Romanian National Identification Number for David Stefan is 1234567890123.
- Transaction Reporting will include the following information:
  - o First name = David
  - o Surname = Stefan
  - o Date of birth = 1952-05-08
  - o Country code and identifier = RO1234567890123
  - o National identifier code = NIDN

## INTERNATIONALLY MOBILE EMPLOYEES

The same principles as above will apply to internationally mobile employees. Even though an employee may work in a number of different countries, their national identifier remains the same and continues to be recorded as per their primary nationality.

## STOCK PURCHASE PLANS

There are certain dealing transactions that do not need to be reported and this includes an acquisition or disposal under an employee share plan where all the following criteria are met:

- (i) the dates of acquisition or disposal are pre-determined and published in advance;
- (ii) the investment decision concerning the acquisition or disposal that is taken by the investor amounts to a choice by the investor to enter into the transaction with no ability to unilaterally vary the terms of the transaction;
- (iii) there is a delay of at least ten business days between the investment decision and the moment of execution;
- (iv) the value of the transaction is capped at the equivalent of a thousand euros for a one off transaction for the particular investor in the particular instrument or, where the arrangement results in transactions, the cumulative value of the transaction shall be capped at the equivalent of five hundred euros for the particular investor in the particular instrument per calendar month.

Current stock purchase plans will need to be reviewed to determine whether or not reportable data will need to be collected prior to 2018 purchases.

# MiFID II Data Collation

**TABLE 1 - NATIONAL IDENTIFIER CODES**

The following table represents some of the national identifier codes that are relevant to shareholders and employees.

| Code | Name                           | Definition   |
|------|--------------------------------|--|
| CCPT | Passport Number                | Number assigned by an authority to identify the passport number of a person          |
| CUST | Customer Identification Number | Number assigned by an issuer to identify a customer                                  |
| NIDN | National Identity Number       | Number assigned by an authority to identify the national identity number of a person |
| SOSE | Social Security Number         | Number assigned by an authority to identify the social security number of a person   |
| TXID | Tax Identification Number      | Number assigned by a tax authority to identify a person                              |

**TABLE 2 - NATIONAL IDENTIFIER AND PRIORITY**

The following table shows country codes and priority of national identifiers.

| Country code | Country name   | National identifier 1st priority  | Code | National identifier 2nd priority | Code | National identifier 3rd priority | Code |
|--------------|----------------|---|------|----------------------------------|------|----------------------------------|------|
| AT           | Austria        | CONCAT  |      | CUST                             |      |                                  |      |
| BE           | Belgium        | Belgian National Number (Numéro de registre national – Rijksregisternummer) | NIDN | CONCAT                           |      | CUST                             |      |
| BG           | Bulgaria       | Bulgarian Personal Number   | NIDN | CONCAT                           |      | CUST                             |      |
| CY           | Cyprus         | National Passport Number  | CCPT | CONCAT                           |      | CUST                             |      |
| CZ           | Czech Republic | National identification number (Rodné číslo)                                | NIDN | Passport Number                  | CCPT | CONCAT                           | CUST |
| DE           | Germany        | CONCAT  |      | CUST                             |      |                                  |      |
| DK           | Denmark        | Personal identity code 10 digits alphanumerical: DDMMYYXXXX                 | NIDN | CONCAT                           |      | CUST                             |      |
| EE           | Estonia        | Estonian Personal Identification Code (Isikukood)                           | NIDN |                                  |      |                                  |      |
| ES           | Spain          | Tax identification number (Código de identificación fiscal)                 | TXID |                                  |      |                                  |      |
| FI           | Finland        | Personal identity code  | NIDN | CONCAT                           |      | CUST                             |      |
| FR           | France         | CONCAT  |      | CUST                             |      |                                  |      |
| GB           | United Kingdom | UK National Insurance number  | SOSE | CONCAT                           |      | CUST                             |      |
| GR           | Greece         | 10 DSS digit investor share   | NIDN | CONCAT                           |      | CUST                             |      |
| HR           | Croatia        | Personal Identification Number (OIB – Osobni identifikacijski broj)         | NIDN | CONCAT                           |      | CUST                             |      |
| HU           | Hungary        | CONCAT  |      | CUST                             |      |                                  |      |
| IE           | Ireland        | CONCAT  |      | CUST                             |      |                                  |      |
| IS           | Iceland        | Personal Identity Code  | NIDN |                                  |      |                                  |      |

| Country code | Country name        | National identifier 1st priority                                      | Code | National identifier 2nd priority            | Code | National identifier 3rd priority | Code |
|--------------|---------------------|---|------|---|------|----------------------------------|------|
| IT           | Italy               | Fiscal code (Codice fiscale)  | TXID |   |      |                                  |      |
| LI           | Liechtenstein       | National Passport Number  | CCPT | National Identity Card Number               | NIDN | CONCAT                           | CUST |
| LT           | Lithuania           | Personal code (Asmens kodas)  | NIDN | National Passport Number                    | CCPT | CONCAT                           | CUST |
| LU           | Luxembourg          | CONCAT  |      | CUST  |      |                                  |      |
| LV           | Latvia              | Personal code (Personas kods)   | NIDN | CONCAT                                      |      | CUST                             |      |
| MT           | Malta               | National Identification Number  | NIDN | National Passport Number                    | CCPT |                                  |      |
| NL           | Netherlands         | National Passport Number  | CCPT | National identity card number               | NIDN | CONCAT                           | CUST |
| NO           | Norway              | 11 digit personal id (Foedselsnummer)                                 | NIDN | CONCAT                                      |      | CUST                             |      |
| PL           | Poland              | National Identification Number (PESEL)                                | NIDN | Tax Number (Numer identyfikacji podatkowej) | TXID |                                  |      |
| PT           | Portugal            | Tax number (Número de Identificação Fiscal)                           | TXID | National Passport Number                    | CCPT | CONCAT                           | CUST |
| RO           | Romania             | National Identification Number (Cod Numeric Personal)                 | NIDN | National Passport Number                    | CCPT | CONCAT                           | CUST |
| SE           | Sweden              | Personal identity number  | NIDN | CONCAT                                      |      | CUST                             |      |
| SI           | Slovenia            | Personal Identification Number (EMŠO: Enotna Matična Številka Občana) | NIDN | CONCAT                                      |      | CUST                             |      |
| SK           | Slovakia            | Personal number (Rodné číslo)   | NIDN | National Passport Number                    | CCPT | CONCAT                           | CUST |
|              | All other countries | National Passport Number  | CCPT | CONCAT                                      |      | CUST                             |      |