



Commission de Surveillance
du Secteur Financier

FAQ eRIIS

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PART I – Accounts and Certificates

1.1. What is a LuxTrust certificate?

LuxTrust is a certification authority. The digital certificates from LuxTrust guarantee the identity and authenticity of the person connecting to an online application, among other usage options.

1.2. Do I need a LuxTrust certificate for eRIIS?

Every eRIIS user needs a LuxTrust certificate to access the CSSF portal to guarantee proper identification (“who are you?”) and authentication (“how do you prove who you are?”).

1.3. Can I also use certificates from other certification authorities?

For eRIIS, only LuxTrust certificates are accepted to access the application and create user accounts.

1.4. Which LuxTrust product can I choose?

You are free to choose *any* LuxTrust device (e.g. Token, SmartCard, Scan or LuxTrust App). They all provide an appropriate level of security for identification and authentication purposes.

For your evaluation however, you may wish to take the identification process (online or face-to-face) and the delivery time of the different products into consideration. These can be found on the LuxTrust webpages mentioned in the following FAQ.

1.5. Do I choose a LuxTrust product for individuals or for professionals?

Both product types can be used to access the eRIIS portal. LuxTrust’s website provides further information concerning the [products for individuals](#) and the [products for professionals](#).

Regardless of the product type chosen, the responsibility for operating on the eRIIS platform (with the related user account) always lies with the individual holding the certificate.

1.6. How can I order a LuxTrust certificate?

Orders have to be directly placed with [LuxTrust](#).

LuxTrust's website details the process for the [products for individuals](#) as well as the [products for professionals](#). Please, note that online identification (by video) is possible for some product types, but not for all.

The LuxTrust [support section](#) may also prove useful, in particular the sub-section "Order my product". Please address all questions you might have regarding the ordering process directly to LuxTrust.

1.7. I already possess a LuxTrust certificate. Can I use it with eRIIS or do I need a new one?

You can use your current certificate, but you can also order a new one specially for eRIIS, if you prefer.

A LuxTrust certificate allows you to confirm your identity towards the eRIIS portal. When creating your eRIIS user account, the LuxTrust certificate you use will be linked to your eRIIS user account (cf. the User Guide "Access and Authentication").

1.8. Can Luxembourg non-residents also apply for a LuxTrust certificate?

Yes.

1.9. What is the difference between a LuxTrust certificate and a user account?

A LuxTrust certificate is a means of identification and authentication which you need for creating and using your eRIIS user account.

Indeed, when creating your eRIIS user account, your LuxTrust certificate and your account are linked on a one-to-one basis (cf. the User Guide "Access and Authentication"). Also note that eRIIS enables entities to manage their access rights among different types of users, each with rights corresponding to the role assigned to him/her (cf. the User Guide "Roles & Rights management").

1.10. Can several employees share a single LuxTrust “company certificate”?

No, they cannot, because LuxTrust certificates are issued to individuals (even the professional products).

Moreover, anybody supposed to work on the eRIIS platform needs to have his/her own eRIIS user account (and therefore also his/her own certificate, since it is linked to a single eRIIS user account).

1.11. Does the LuxTrust certificate have a limited validity period?

The validity period of the certificates is published on LuxTrust’s website (currently 3 years).

1.12. I already have an e-Prospectus user account. Do I need to create a new user account for eRIIS?

You can use your e-Prospectus user account for accessing eRIIS.

PART II – User Accounts (establishment and organisation)

2.1. I transmit information to eRIIS through the OAM. Can I dispense with eRIIS?

No. All entities subject to filing requirements under the Transparency Law¹ and required to make filings with the CSSF pursuant to the Market Abuse Regulation² (i.e. "Reporting Entities") need an eRIIS User Account.

As a matter of convenience and in order to reduce red tape, the CSSF and the OAM (Officially Appointed Mechanism)³ have set-up an API⁴ (between the OAM and eRIIS) allowing users of the OAM to submit filings, made with the OAM, at the same time to the CSSF. Note however that this functionality can only be used for the first submission of each filing to the CSSF and not for any follow-up of such a filing. After the initial filing is transferred from the OAM to the Reporting Entity's eRIIS account, any further exchange with the CSSF (e.g. access to the filing status, follow-up requests by the CSSF, provision of additional information in case a filing is incomplete) is directly done between the Reporting Entity and the CSSF and is thus only possible *via* eRIIS. General communication with the CSSF (e.g. exchange of messages and electronic versions of official letters) is also only possible directly *via* eRIIS.

2.2. How do I become SuperUser of a Reporting Entity?

After thorough verifications, one User Account per Reporting Entity will be assigned the role of SuperUser. The CSSF will in that context notably require confirmations that the user in question is entitled to act on behalf of a Reporting Entity. The process triggering the assignment of the SuperUser is linked to the creation of a Reporting Entity in eRIIS and depends on the type of Reporting Entity.

¹ Law of 11 January 2008 on transparency requirements for issuers (Transparency Law).

² Regulation (EU) No 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse (Market Abuse Regulation).

³ The Luxembourg Stock Exchange has been designated as the operator of the Luxembourg OAM pursuant to the Grand-ducal Regulation of 3 July 2008 on the official appointment of mechanisms for the central storage of regulated information within the meaning of the Law of 11 January 2008 on transparency requirements for issuers of securities.

⁴ Application Programming Interface.

- (i) Issuers of securities subject to the Transparency Law will be contacted by the CSSF as soon as they fall under the scope of that law. In that context they will be requested to provide information concerning the designation of the issuer’s SuperUser.
- (ii) Users intending to file information on behalf of issuers (for which a Reporting Entity does not yet exist in eRIIS) required to make filings with the CSSF under the Market Abuse Regulation but not falling in the scope of the Transparency Law¹, should proceed as follows to set up a Reporting Entity and define the relating SuperUser:
 - (1) “Create a new reporting entity” in eRIIS,
 - (2) provide the requested information (which includes downloading the “proof of mandate”, completing it and uploading it in eRIIS) and
 - (3) click on “Submit”.
- (iii) Holders of securities shall follow the same procedure as detailed under (ii).

2.3. Which filings can I do through eRIIS?

The type of filings accessible for each Reporting Entity depends on its characteristics² and as such on the applicable legal requirements. The table hereafter summarises the different scenarios:

Type of eRIIS filings / Type of entity	Transparency Law - Ongoing information	Transparency Law - Periodic information	Market abuse	Notification for holders of securities
Issuer of securities subject to the Transparency	✓	✓	✓	✓
Issuers required to make filings with the CSSF under MAR ³	✗	✗	✓	✓

¹ Such issuers may either be excluded from the scope of the Transparency Directive (given that they have not issued any securities which are admitted to trading on a regulated market) or may fall within the scope of the Transparency Directive but Luxembourg is not their home Member State.

² These characteristics first and foremost concern whether securities issued by the Reporting Entity are admitted to trading or listed on a EU trading venue, the type of trading venues (e.g. regulated market or MTF) as well as the country of the Reporting Entity’s registered office.

³ Concerns issuers required to file information with the CSSF under the Regulation (EU) No 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse (Market Abuse Regulation) but not falling in the scope of the Transparency Law.

Holders of securities	✘	✘	✘	✔
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In general, the CSSF assigns access to the relevant types of filings based on information available and may, where relevant, request additional information in that respect. Whenever the available types of filings do not accurately reflect the Reporting Entity’s situation or in case the situation changes, they are invited to contact the CSSF in order to proceed with any necessary update.

2.4. Can I provide eRIIS services to various Reporting Entities?

Yes. To be able to do so, you need to be registered in eRIIS as the SuperUser, Depositor or Depositor+ of each of these Reporting Entities.

2.5. Can a third-party file a notification of major holdings in eRIIS on behalf of a holder?

Yes. There are two scenarios.

Scenario 1: The holder of major holdings creates its own Reporting Entity and will be registered as SuperUser of its own Reporting Entity. Following the validation of the Reporting Entity, the SuperUser status will allow roles such as Depositor+ or Depositor to be assigned to third parties (e.g. lawyers, financial service providers or any other designated representative, including possibly those within the concerned issuer) who will then have the rights to file information on behalf of the Reporting Entity¹.

Scenario 2: Provided that it is entitled to do so, the third party (e.g. lawyer, financial service provider or any other designated representative, including possibly those within the concerned issuer) creates the Reporting Entity on behalf of the holder of major holdings. Where deemed necessary, additional information and documents confirming the entitlement of the third party to such a mandate may be required by the CSSF. Following the validation of the Reporting Entity, the person having requested its creation becomes automatically its Super User and may start filing on its behalf or may assign roles (Depositor+, Depositor) to other users.

These scenarios are in general also possible when employees or representatives of the issuer intend to proceed with filings on behalf of the holder of securities, provided that they are entitled to do so.

¹ The Depositor+ status will also allow such third parties to follow-up on filings.

2.6. Can a third-party file a notification of transactions on behalf of a person discharging managerial responsibilities (PDMR) in eRIIS?

Yes. Please refer to the previous question, the procedure is the same as for holders of major holdings.

2.7. Is the Reporting Entity of an issuer allowed to file both the PDMR notification by the holder (HOS-2) and the PDMR notification by the issuer (MAR-2)?

No. The PDMR notification (HOS-2 form) of a holder must be filed by the Reporting Entity corresponding to the holder in question. Note however that an employee of the issuer can be linked to the Reporting Entity of the PDMR (as SuperUser, Depositor+ or Depositor). Thus, both filings (by the holder and by the issuer) can be done by the same user, but keep in mind that they have to be done on behalf of two separate Reporting Entities (i.e. once for that of the holder and once for that of the issuer).

2.8. Which email address do I need to provide to create an eRIIS User Account?

To create an eRIIS User Account, an email address is required. It shall be the professional email address of the person who wants to create an account. Generic or shared email addresses as well as private email addresses of online email service providers are generally not accepted.

PART III - Information filing

3.1. I filed the wrong document with eRIIS. How can I correct my filing?

A filing cannot be modified while its status is "In review". In order to be able to modify a filing in this case, the Reporting Entity shall contact the CSSF *via* the "Comments" section of the filing in question and request the CSSF to set the status to "Waiting for feedback". When the status of the filing is "Waiting for feedback", first use "modify my filing" and deactivate the wrong document in eRIIS (Menu / Documents / Action(s) → Deactivate). Then, upload the correct document and resubmit your filing.

Also make sure the correct document is stored on the OAM and disseminated according to the requirements of the Transparency Law. In case the wrong document has been stored on the OAM, it shall be marked as "obsolete" and replaced.

Finally, please note that filings which have been transferred to eRIIS from the OAM, cannot be updated *via* the OAM (cf. FAQ 2.1.). All eRIIS filings can only be modified in eRIIS. As such, any modifications to filings which are done in the OAM are not taken into account in eRIIS.

3.2. The status of my eRIIS filing is now "completed". Can I modify my filing?

A completed filing cannot be modified anymore (the CSSF having closed the eRIIS filing process). As a consequence, a new filing needs to be created. If necessary, explanatory information should be provided in the new filed document as well as under the "Remark" metadata field.

3.3. Can I file different parts of a financial report on a separate basis in eRIIS?

Yes, this might notably be required in case different parts of the financial report (e.g. consolidated and non-consolidated accounts) are available at different moments in time.

Keep in mind however that separate documents that pertain to the same financial report represent a single filing in eRIIS. As a consequence, the filing of a financial report will not be considered as being complete until it contains all its constituting parts (e.g. consolidated and non-consolidated accounts). The parts not yet filed in eRIIS need to be added to the existing filing, as soon as they are available. Users shall not create a new, separate filing for documents relating to the same financial report (as the additional filing would be rejected by the CSSF).

3.4. When can I add a document to an eRIIS filing?

Documents can be added to an eRIIS filing as long as said filing is not submitted (i.e. by clicking on "Submit"). When an eRIIS filing is submitted, its status is automatically changed to "In review" and as a consequence, said filing cannot be modified anymore (cf. FAQ 3.1.). After its review by the CSSF (and in case it is incomplete), the filing's status will be changed to "Waiting for feedback", allowing further modifications.

3.5. What does the "Reference date" metadata refer to?

The "Reference date" metadata corresponds to the date to which the information that is being filed refers to, e.g. the date of the document in question.

3.6. I filed an annual financial report and received an ESEF error message. What does it mean?

The system performs automatic checks on financial reports drawn up pursuant to the European Single Electronic Format (ESEF)¹, including the tagging of annual financial reports which contain consolidated financial statements in IFRS and which are filed in eRIIS (directly or *via* the FIRST tool of the Luxembourg Stock Exchange). Should the system detect any issue regarding a filed annual financial report, an automatic feedback with a request for corrective action will be generated, as soon as those controls are completed.

¹ Cf. Commission Delegated Regulation (EU) 2019/815 of 17 December 2018 supplementing Directive 2004/109/EC of the European Parliament and of the Council with regard to regulatory technical standards on the specification of a single electronic reporting format.

Please be reminded that you may always access the status of a filing in eRIIS.

3.7. Is it required to provide Metadata?

All mandatory Metadata fields must be completed as part of the filing process. In case of missing mandatory Metadata, inconsistencies reports and warnings will be triggered by eRIIS. Although submission will in most cases not be blocked due to missing mandatory Metadata, filings with incomplete mandatory Metadata fields will in principle trigger a comment from the CSSF requesting the provision of the missing information.

3.8. What information am I expected to provide in Metadata fields concerning the disclosure of information?

Although, the description of each Metadata field is in principle self-explanatory, additional clarification may be useful for metadata about the disclosure of information:

- "Date and time when the information was first made publicly available (Timezone = Luxembourg Time)" corresponds to the moment when the substance of the information being filed is/was first made publicly available (whether or not such disclosure was done in the context of the Transparency Law and/or Market Abuse Regulation).
- "OAM date" refers to the date when the information in question has been stored on the OAM.
- the "Dissemination date" corresponds to the date when the information was effectively disseminated to the public in all Member States in accordance with the requirements of the Transparency Law (please refer to question 10 of the FAQs on the Transparency Law and the Transparency Regulation).

The "Dissemination channel" corresponds to the media used to effectively disseminate information to the public in all Member States. Please be aware that issuers may either disseminate information themselves by transmitting it to the media or through a company specialised in the dissemination of information¹.

¹ Notably by transmitting them to one or several press agencies specialised in financial information and/or to one or several widely circulated newspapers allowing to reach the investors concerned. Please refer to question 10 of the FAQs on the Transparency Law and the Transparency Regulation.

3.9. I have submitted a message through eRIIS but I have not received any reply.

It is possible that your message is in “draft” status and has not yet been transmitted to the CSSF. Please check that your message has been “published”.

Indeed, in order to be transmitted to the CSSF, messages to the CSSF through the “Messages” section of eRIIS, are required to be published (by using the  icon). As long as messages are not published, they remain in a “draft” status and may be deleted or modified, but will not be transmitted to the CSSF.

3.10. I am an issuer of securities and Article 7 of the Transparency Law applies to me. Do I need to use eRIIS?

All submissions of regulated information must be made *via* eRIIS. The exemptions foreseen by Article 7 of the Transparency Law represent partial exemptions, without prejudice to all the other requirements under said law. Moreover, general communication with the CSSF (e.g. exchange of messages and electronic versions of official letters) will be done directly *via* eRIIS. As a consequence, issuers benefiting from Article 7 of the Transparency Law need to have their own eRIIS User Account. In that respect, please also refer to [questions 48 and 57 of the FAQs on the Transparency Law and the Transparency Regulation](#). Finally, note that should financial reports be published as inside information (in accordance with Article 17 of the Market Abuse Regulation), said filing category should be selected in eRIIS. Otherwise, the eRIIS category “Information filed on a voluntary basis” can be used.



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