![CSSF - Commission de Surveillance du Secteur Financier]

Key Information Document

Practical and technical guidance

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Update information

Date	Version	Changes
16/10/2024	1.0	Publication of the document
19/11/2024	1.1	Details on the delegation feature (4.4.4)
17/01/2025	1.2	Archive size set to 50 Mb
14/05/2025	1.3	Review of the delegation management (4.4.4)
05/06/2025	1.4	deletion of the description of the old delegation management (4.4.4)
10/07/2025	1.5	Naming convention of the pdf file

1. Glossary

1.1. Glossary

Notion	Definition
Bucket	A bucket is a container for objects. S3 stores data as objects within buckets. An object is a file and any metadata that describes the file. Each entity manages its own separate buckets to be used for each report type.
IFMs	Investment Fund Managers
IT Expert	The "IT Expert" is an eDesk specific role that is granted by the "Advanced User" of the entity to the person managing access to the S3 API. A person with this role is responsible for creating, viewing and revoking access keys.
S3	S3 – or "simple storage service" – is the object storage protocol (through a web service interface) used by the CSSF for the file exchange. In this context, S3 simply refers to the protocol for managing object storage and does not rely on any services provided by commercial cloud providers.
UCI	Undertakings for Collective Investment
KID	Key Information Document

2. Introduction

The general objective of this document is to provide practical and technical information on the Key Information Document submission to CSSF.

All the entities concerned by KID submission must provide a document to CSSF when they establish or update them. It is strongly recommended that all entities sends us every year their documents, even if they have not been updated. This will help to have a reliable statistical database on which to carry out consistent analyses.

The entities subject to the External Asset Managers reporting can submit it through 2 channels: via online form filling (eDesk procedure) or by S3 submission.

The KID received are then sent for publication to Fundsquare.

3. Scope

The KID must be submitted by the fund (self managed) or IFM (management company for UCITS or AIFM for AIFs externally managed). This means that the enrolment process must be done by the entity responsible for the submission of the data.

4. eDesk application

4.1. Authentication and connection

The person in charge of submitting the document is required to have an eDesk account (available with a LuxTrust authentication) and must be linked to the relevant entity. Further details can be found in the User Guide ("Authentication and user account management") from the dedicated section of the CSSF eDesk Portal homepage: https://edesk.apps.cssf.lu/edesk-dashboard/dashboard/getstarted.

4.2. eDesk dashboard homepage
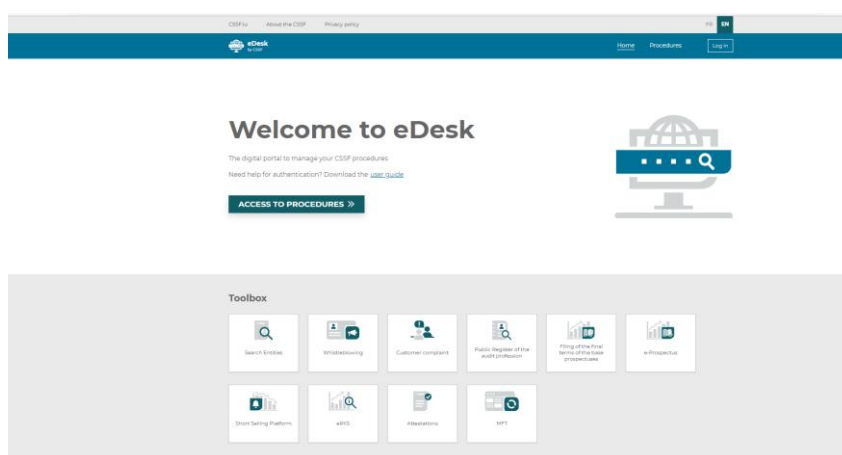
The eDesk homepage screen is split as follows:

- The **Header** is the upper part of the screen where you can find:
  - The navigation menu that shows several useful links. "**CSSF.lu**" sends you back to the CSSF website. "**About the CSSF**" and "**Privacy policy**" send you to the dedicated CSSF website sections respectively about CSSF itself and its privacy policy.
  - The **language option** is available on each screen and it is possible to switch between languages throughout the authentication procedure.
  - The "**Log in**" button takes you to the screen to be used to connect to the eDesk portal.
  - The "**Procedures**" button that takes you to the "Log in" page if you are not connected yet or the procedures list.
- The **Toolbox** gathers several e-services (applications) that do not require an authentication.
- The **News** section presents the latest information related to eDesk.
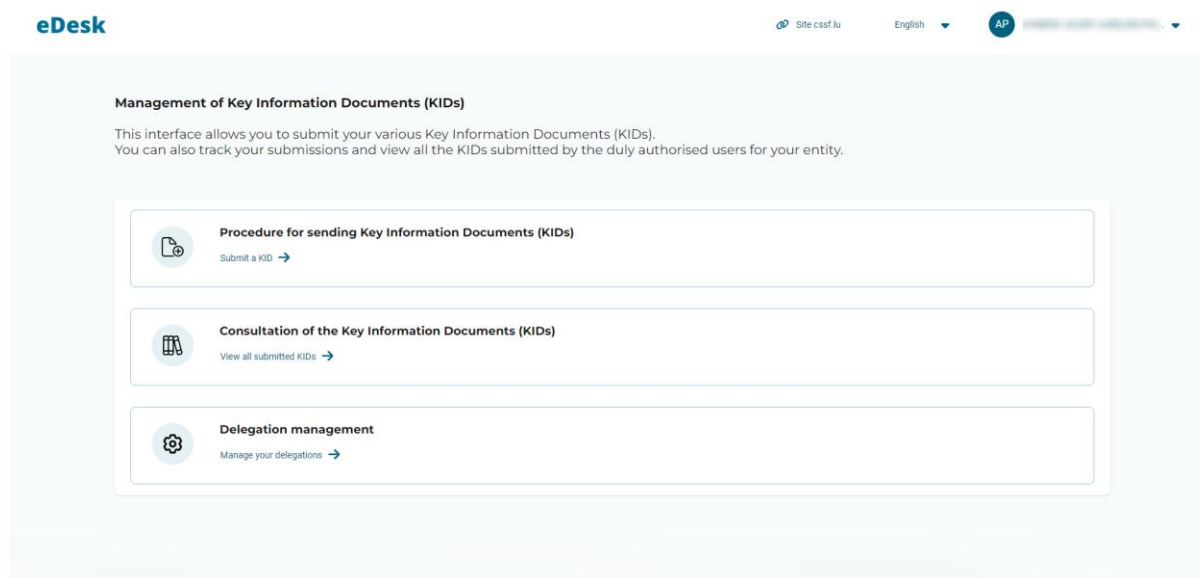
4.3. Access to procedures

Click on the "Access to procedures" button and search for the KID deposit operation using the 'Investment funds and vehicles / Investment fund managers' filter.
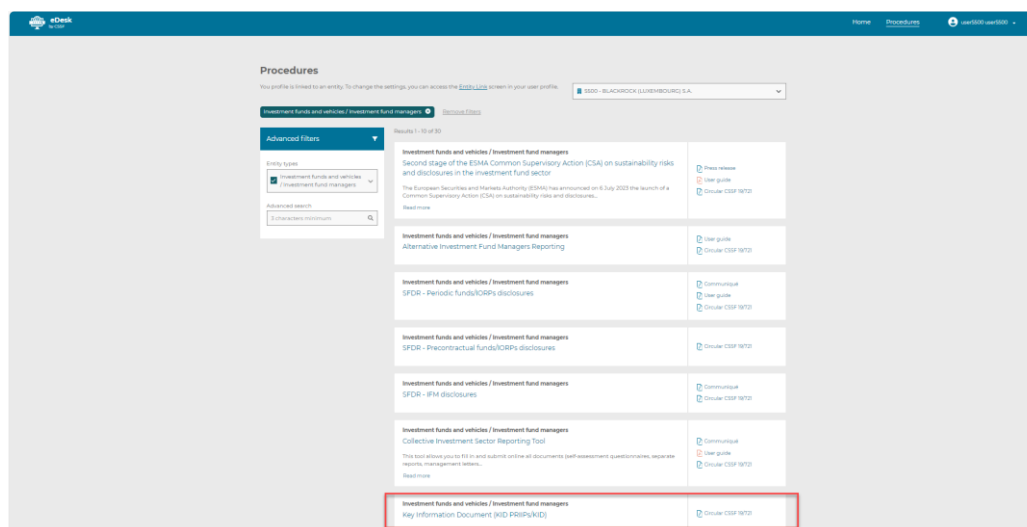
To access the procedure, click on the hyperlink "Key Information Document (KID PRIIPs/KID)".

4.4. KID submission

4.4.1. Main dashboard

The main dashboard offers three features :

- Procedure for sending the KID : submit one or more KID for the entity you are responsible for
- Consultation of the KID : view a summary of all the KID that have previously been submitted

- Delegation management : manage submission delegations to third parts

### 4.4.2.   Submission of Key Information Documents (KIDs)

There are four main stages in filing a KID. To make it easier to process your KID, it is strongly advised to use the following nomenclature for all your KID: "*DOCREP-ENNNNNNNN-CCCCCCCC-PPPP-YYYY-MM-DD-KI-LL-nnnn*".

To start the submission process, click on the "Submit a KID" button:
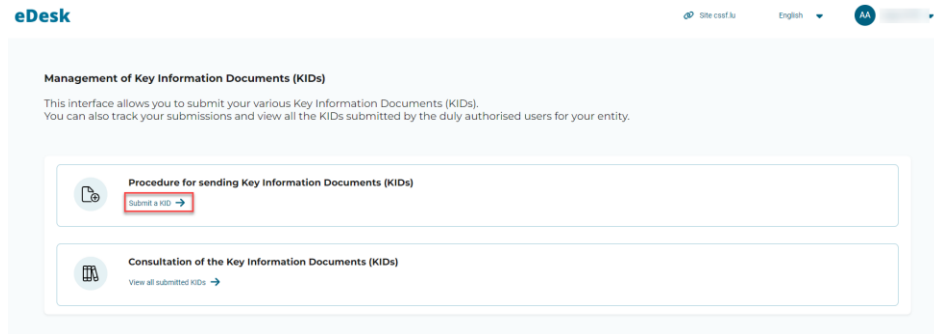
1. Entity selection

In the first step, the user must select the entity for which they need to submit a KID. The list of all the entities with which he has a relationship is displayed. The user selects one of the entities and clicks on the 'Submit' button to move on to the next step.
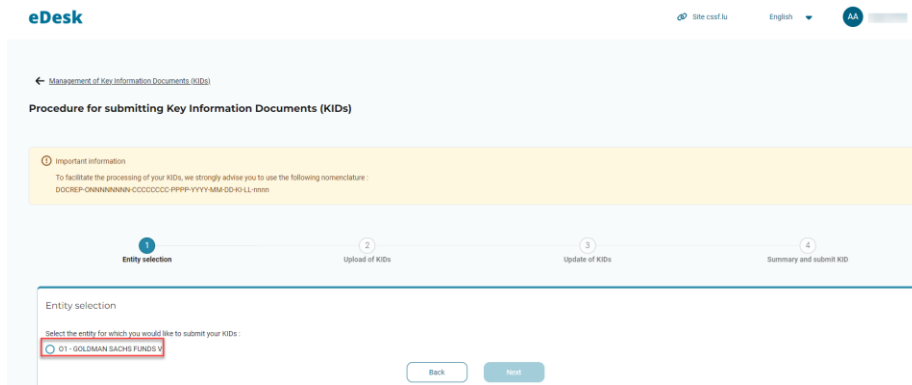
2. Upload of KIDs

This view allows the user to upload the document in pdf format. Click on the 'Browse your documents' button to access your local directory and select the document to upload. Once the document has been added, click on the 'Next' button to confirm the details of the uploaded document.

3. Update of KIDs

This step allows you to update the various pieces of information associated with the KID that has been filed: sub-fund, share class, document date, language, and to specify whether it is a PRIIPs or not. It is also an opportunity to mention the various additional share classes associated with the KID that has been filed. In this case, click on the "Add a share class" button and select the appropriate share type from the list.

If multiple documents are added at the same time, it is possible to duplicate the document date, language and PRIIPS label. Simply select the checkbox associated with this label.

If all the information is complete, click on the 'Submit' button to move on to the next step.

4. Summary and submit KIDs

This view provides a summary of the information on the document(s) that have been submitted. It is still possible to update these information by clicking on the action buttons in the corresponding column. Two actions are possible: 'Modify the information' and 'Delete the document'.

If all the information meets the user's expectations, click on the 'Submit' button to submit the KID definitively.

A confirmation pop-up is displayed. When the 'Send' button is clicked again, the submission confirmation message is displayed.
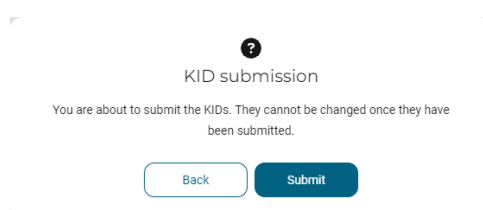
4.4.3.   Consultation of Key Information Documents (KIDs)

This feature allows you to view all the KIDs filed for the entity.

KIDs are displayed from the most recent to the oldest date. This section allows you to consult the KIDs you have submitted, as well as all the KIDs transmitted by the other people linked to your entity.

4.4.4. Delegation management

The "Delegation management" menu allows a declarant or a sender to consult their entity's delegations by clicking on the "Manage your delegations" button.
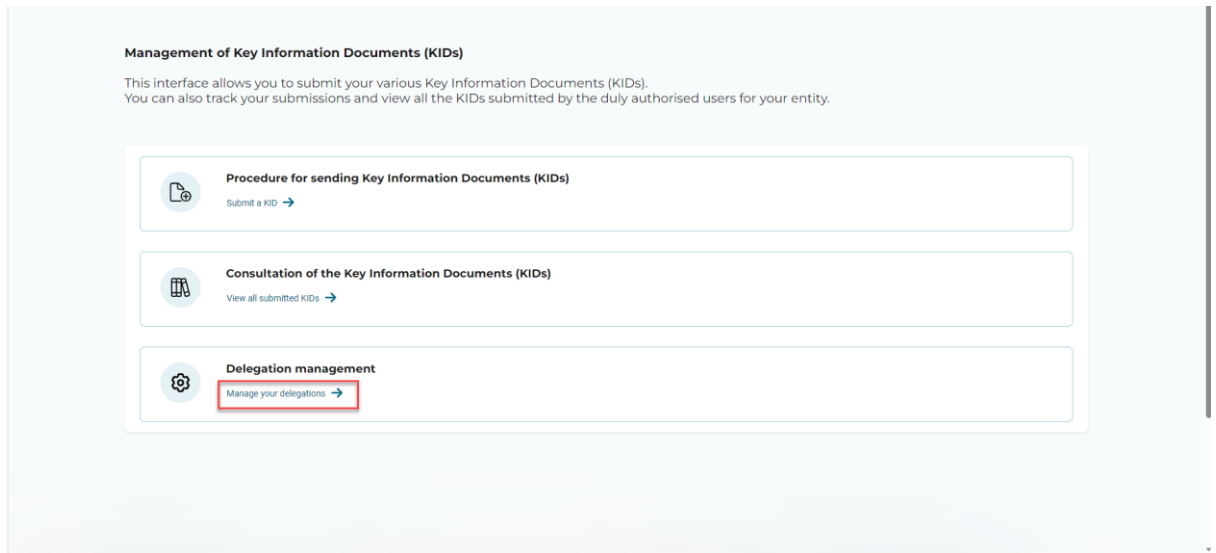
Declarant: Entity responsible for transmitting the KID, which can designate one or more senders to transmit KIDs for the funds under management.

Sender: Entity designated by the declarant to transmit KIDs via S3 and eDesk for a scope of funds defined by the declarant.

The following screen appears:
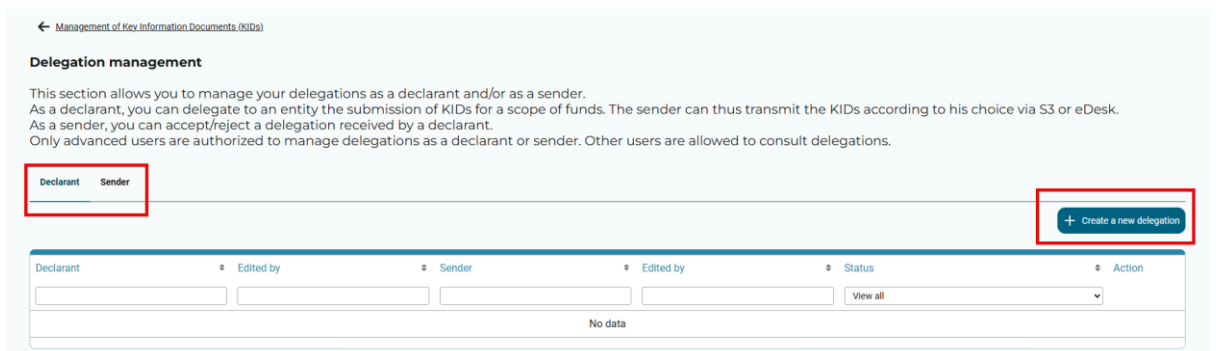
This section allows you to manage your delegations as a declarant and/or as a sender.

As a declarant, you can delegate to an entity the submission of KIDs for a scope of funds. The sender can thus transmit the KIDs according to his choice via S3 or eDesk.

As a sender, you can accept/refuse a delegation received by a declarant.

Only advanced users are authorized to manage delegations as a declarant or sender. Other users are allowed to consult delegations.

As a declarant, click on the "Create a new delegation" button, a pop-up window appears:

- Enter the sender (enter the name or the reference of the entity) who will be responsible for filing the KID on behalf of the declarant.
- Add a communication (optional)
- Select the funds under management for which you wish to grant a delegation. There are two options:
  - "Select all funds permanently": this option allows you to permanently authorise all funds of your entity. When a new fund is linked to your entity, you do not have to add him on the delegation.
  - "Select fund by fund": this option allows you to authorise a scope of funds.
- At the end, click on the "Confirm" button

All advanced users of the sender receive an e-mail with the subject: "Invitation to contribute on CSSF eDesk Key Information Documents (KID) for funds".

An eDesk link is available in the email to consult the delegation and thus accept or refuse the declarant's delegation (only an advanced user of the sender can accept or refuse).

When the advanced user of the sender accepts the declarant's delegation, a pop-up window appears.

The sender acknowledges the funds delegated by the declarant.

The sender also acknowledges that they are automatically authorized to transmit KIDs on behalf of the declarant (for delegated funds only) via S3. The sender can therefore transmit via his own bucket an archive concerning a fund delegated by his declarant.

Finally, the sender must select the eDesk users linked to their entity who will be authorized to submit KIDs/consult the KIDs transmitted on behalf of the declarant. There are two options:

- "Select all users permanently": this option allows you to permanently authorize all eDesk users of your entity. When a new eDesk user is linked to your entity, you do not have to add him on the delegation.
- "Select user by user": this option allows you to authorize a scope of eDesk users.

At the end, click on the "Confirm" button.

The sender is therefore authorized to consult all KIDs transmitted for the delegated funds regardless of the submitting entity.

At any time, the sender can:

- Consult the details of a delegation by clicking the "Consult this delegation" button.
- Modify the eDesk users authorized for a delegation by clicking the "Modify authorized users" button.

- Cancel a delegation by clicking the "Cancel this delegation" button.

At any time, the declarant can:

- Consult the details of a delegation by clicking the "View this delegation" button.
- Modify the delegated funds by clicking the "Modify delegated funds" button.
- Cancel a delegation by clicking the "Cancel this delegation" button.

5. S3 File collection

5.1.   S3 system reporting technical specifications

Method of transmitting reports via Application Programming Interface can be found on our website following this link.

In the eDesk IT management console, the 'IT Expert' must create a bucket '**Key Information Document (KID PRIIPs/KID)**'.

The "IT Expert" is in charge of monitoring all S3 credentials that might be created. The sharing of S3 credentials and file upload through a third party remains the role responsibility of the entity.

5.1.1.   Reporting file

5.1.1.1.   Reporting format

The Key Information Document shall be reported in the PDF format. A JSON containing information about the KID and the submitting entity must be added to the PDF.

The JSON and the PDF must be compressed in a ZIP format.

During the file submission the system performs a check on the zip naming and format and its contents.

Key Information document JSON schema :

The schema concerning the reporting is available at: JSON Schema

5.1.1.2.   Naming conventions

- **ZIP file**

The mandatory file naming convention for .zip files is specified below.

Format: **KIDFUND-ENNNNNNNN-UUID.ext**

Code	Meaning	Structure	Authorised value
KIDFUND	Reporting type	Char(7)	'KIDFUND' (constant)
-	Separator	Char(1)	'-' (constant)
E	Reporting entity	Char(1)	Entity type : 'O', 'K', 'V'

NNNNNNNN	Identification number	Number (8)	00000001…99999999 (CSSF code of the entity)
-	Separator	Char(1)	'-' (constant)
UUID	Unique identifier (ReportUid)	UUID format	Unique identifier following the rfc 4122 norm
.ext	Extension	Char(5)	.zip (constant)

UUID specificities

The **UUID** is necessary to uniquely identify a report. It is also used to prevent a file to be processed several times.

A ZIP file with the same UUID of another ZIP file concerning the same entity will be rejected with the error KIDFUND006 (cf. chapter 5.1.2.2.3).

The expected format of an UUID is:

XXXXXXXX-XXXX-XXXX-XXXX-XXXXXXXXXXXX

where each X data can have a value from 0 to 9 or from a to f (hexadecimal authorised characters).

You can find more information about the UUID on Universally Unique Identifier (UUID).

- **JSON report**

No specific naming convention will apply for the JSON file included in the zip file.

- **PDF file**

The pdf file must be transmitted with the naming convention "*DOCREP-ENNNNNNNN-CCCCCCCC-PPPP-YYYY-MM-JJ-KI-LL-0000.pdf*".

Example:

Archive	KIDFUND_O0000NNNN-4823ac4f-0175-449e-af97-83ec72dfc805.**zip**
JSON report	report.**json**
PDF file	DOCREP-O0000NNNN-00000002-0010-2024-12-31-KI-FR-0000.**pdf**

The mandatory file naming convention for .pdf files is specified below.

Format: **DOCREP-ENNNNNNNN-CCCCCCCC-PPPP-YYYY-MM-JJ-KI-LL-0000.**

Code	Meaning	Structure	Authorised value
DOCREP	Reporting type	Char(6)	'DOCREP' (constant)
-	Separator	Char(1)	'-' (constant)
E	Reporting entity	Char(1)	Entity type : 'O', 'K', 'V'
NNNNNNNN	Identification number	Number (8)	00000001…99999999 (CSSF code of the entity)
-	Separator	Char(1)	'-' (constant)

CCCCCCCC	Sub-fund	Number (8)	00000001…99999999 (code of the sub-fund)
-	Separator	Char(1)	'-' (constant)
PPPP	Part type	Number (4)	0001…9999 (code of the part type)
-	Separator	Char(1)	'-' (constant)
YYYY	Year	Number (4)	Document date
-	Separator	Char(1)	'-' (constant)
MM	Month	Number (2)	Document date
-	Separator	Char(1)	'-' (constant)
JJ	Day	Char(2)	Document date
-	Separator	Char(1)	'-' (constant)
KI	Document type	Char(2)	'KI' (constant)
-	Separator	Char(1)	'-' (constant)
LL	Document Language	Char(2)	'DE' for German 'EN' for English 'FR' for French 'LU' for Luxembourgish
-	Separator	Char(1)	'-' (constant)
0000	ReportUid	Char(4)	0000…9999
.pdf	Extension	Char(4)	.pdf (constant)

5.1.1.3. Submission process

The ZIP file MUST be uploaded to the "submission" folder in S3. No upload is allowed into other folders (e.g. "feedback" folder is only dedicated to CSSF feedbacks).

5.1.1.4.   ZIP technical specifications

Reporting file must be transmitted via a compressed .zip format containing one single .json file and all eligible KIDs in pdf format.

Here are the specifications for ZIP archive:

Compression algorithm	RFC 1951 (DEFLATE Compressed Data Format Specification version 1.3)
Multi-volume archives (multi-part zipfile)	No
Maximum size of a file in the archive	50 MB
Codepage	UTF-8

5.1.2.   CSSF feedback file

It is up to the submitter to monitor transmission correctness.

A feedback file in JSON format is systematically generated for each file transmitted and made available in the "feedback" folder.

The schema concerning the data of the generated feedback is available in the CSSF feedback file.

Please ensure that you have received a feedback file for the last file sent before submitting a new file concerning a same entity. Feedback generation could take some time. If you do not receive a response within one working day, please contact our dedicated support team at edesk@cssf.lu.

5.1.2.1.   Naming convention

The feedbacks from the CSSF are received in the "feedback" folder of the S3 transfer client.

Format: **SourceFileName_FEEDBACK_TrackingCode.json**

Code	Meaning	Structure	Authorised value
SourceFileName	Reporting entity	Char(N)	Submitted file name - Refer to the ZIP File name structure in section 5.1.1
_	Separator	Char(1)	'_' (constant)
FEEDBACK	File type	Char(8)	FEEDBACK (constant)
TrackingCode	Unique identifier	Char(20)	Unique identifier created by the CSSF system after file submission KIDFUNDYYYYMMDDXXXXX where: YYYYMMDD: year, month and day of submission XXXXX: daily increment

_	Separator	Char(1)	'_' (constant)
.ext	Extension	Char(5)	.json (constant)

5.1.2.2. File content

A feedback file contains several information:

- A status at the report level;
- ReportUids previously processed;
- Feedback messages at the report level.

5.1.2.2.1. Report status

The report status can have two different values:

- REJECTED when the report is entirely rejected. That is the case when the archive is not technically compliant.
- ACCEPTED when the archive is technically compliant and all the relevant data to be included in the report have been correctly reported.

5.1.2.2.2. ReportUids previously processed

The feedback file lists the unique identifiers (reportUid) of the last reports concerning the fund in the CSSF processing order (most recent report at the top of the list).

5.1.2.2.3. Feedback message at report level

If a report has the ACCEPTED status, a feedback message with the "KIDFUND000" code is sent.

If a report has the REJECTED status, the possible errors at report level, are listed in the table below with the severity "ERROR".

Feedback messages

Error code	Error message
KIDFUND000	'The submission has been accepted by the CSSF'
KIDFUND001	'The archive is corrupted'
KIDFUND002	'The archive name is invalid. The expected naming convention must follow : %s'
KIDFUND003	'The archive size cannot exceed 50 MB'
KIDFUND004	'The submitter is not authorised to transmit the archive for this entity'
KIDFUND005	'The entity defined in the naming convention is not in scope'
KIDFUND006	'The archive with uuid has already been received for this entity'
KIDFUND007	'The archive must contain a single JSON file'
KIDFUND008	'JSON file does not respect JSON Schema'

KIDFUND009	'The universal unique identifier '%s' in the JSON file is different from the universal unique identifier used in the archive name'
KIDFUND010	'The CSSF code of the entity in the JSON file is different from the CSSF code of the entity code used in the archive name'
KIDFUND011	'The file name in the JSON file must be unique'
KIDFUND012	'The file name is invalid. The expected naming convention must follow : %s'
KIDFUND013	'The CSSF entity code defined in the file name 'filecssfentityCode' is different to the code 'entityCssfCode''
KIDFUND014	'The referenced file is missing from the archive'
KIDFUND015	'The part type is not in the scope '%s'
KIDFUND016	'The file in the archive must be in PDF format'
KIDFUND017	'The reference for a share class
KIDFUND018	'Number of files into the archive cannot exceed %s files'
KIDFUND019	'The file '%s' is not referenced in the json'
KIDFUND020	'The file '%s' is corrupted'

5.2. Reporting entities obligations

5.2.1. Data quality

Entities are strongly advised to review and validate the reporting files (ZIP and JSON files) before any submission.

Files must be validated against the JSON schema provided by the CSSF.

5.2.2. Review the feedback files and correct the rejected reports

Entities must ensure that all feedback files are properly analysed and that any rejected data are corrected and resubmitted.

5.3. Testing with CSSF

CSSF offers a connectivity check for entities to test their reporting file submissions through the S3 solution before moving to production.

A connectivity check is highly recommended before the Go-Live.

Besides the main "Key Information Document (KID PRIIPs/KID)" service, a dedicated "Echo Service" is at your disposal to ensure the good connectivity between your entity and our systems.

The authentication steps are similar to the regular report in regard to getting the credentials (cf. chapter 2.3.4 in this file) and uploading a file (cf. chapter 2.3.5 in this file).

The "IT Expert" has to create a new access on the "Echo" bucket that is presented below in order to get the right S3 credentials.

You can upload a dummy file to the "submission" folder. If the connectivity check is completed, you will get a dummy feedback file as confirmation in the "feedback" folder.

Please note that this service remains always available.

In case you are unable to connect to the Echo Service or that you are not receiving any feedback, please contact edesk@cssf.lu.

6. Contact information

If you have any questions, please contact edesk@cssf.lu.

To facilitate the processing of your request, please provide the entity's CSSF code and name.