



Commission de Surveillance  
du Secteur Financier

# Circular CSSF 21/781

Mandatory use of the IMAS  
Portal for banking  
qualifying holding and  
passporting notifications

## Circular CSSF 21/781

Re: Mandatory use of the IMAS Portal for banking qualifying holding and passporting notifications

Luxembourg, 23 September 2021

Ladies and Gentlemen,

To all the persons concerned

Early this year the European Central Bank (ECB) and the national competent authorities (NCAs) launched the IMAS Portal<sup>1</sup>. From 27 January 2021, the IMAS Portal became mandatory in Luxembourg for processing the fit and proper applications for all significant banks/groups under the Single Supervisory Mechanism<sup>2</sup>.

As of 27 September 2021, the IMAS Portal will be extended to the processing of passporting notifications from significant banks/groups (SIs) and less significant banks/groups (LSIs) and applications for the acquisition or increase of a qualifying holding in an SI or LSI. Those new modules will be open for receiving submissions from SIs, LSIs or other applicants.

Proposed acquirers shall use the IMAS Portal to submit their applications for banking qualifying holding assessments, track the status of these assessments and exchange related information with supervisors.

Supervised entities shall also use the IMAS Portal for submitting their passporting notifications (new notification, change of notification or cancellation of notification).

<sup>1</sup> The IMAS Portal is a digital gateway for initiating authorisation processes. The portal is a communication channel. It does not change the legal environment under which the ECB and NCAs interact with applicants and does not change in any way the allocation of legal responsibilities between NCAs and the ECB.

The IMAS Portal project is part of the ECB's and NCAs' commitment to enhance digitalisation and increase communication and transparency during supervisory processes.

<sup>2</sup> Circular CSSF 20/763

## 1. Scope of application

The present circular is applicable to acquisitions of qualifying holdings in Luxembourg incorporated credit institutions<sup>3</sup> as well as to all passporting notifications exercised under the freedom of establishment or under the freedom to provide services.

The IMAS Portal should not be used for qualifying holdings applications for third-country banks operating a branch in Luxembourg.

## 2. Mandatory use of the IMAS Portal

The CSSF has decided to make the use of the IMAS Portal mandatory for all notifications in scope.

From **27 September 2021**, proposed acquirers have to exclusively use this dedicated portal for submitting new qualifying holding applications and supervised entities for submitting new passporting notifications.

Applications sent by mail or e-mail will no longer be accepted.

## 3. Practical aspects

Access to the IMAS Portal is via the following link:  
<https://www.bankingsupervision.europa.eu/banking/portal/imas/html/index.en.html>.

The CSSF will no longer accept original paper documents and there is no need to send them by mail either. However, the proposed acquirers have the obligation to ensure that the electronically uploaded documents constitute a true copy of the original and that the original documents are available upon request.

We would like to point out that the proposed acquirers and supervised entities have to use the IMAS Portal not only to submit their initial applications but also for the subsequent related exchange of information with supervisors. E-mails outside the IMAS Portal may be unavoidable; however, the communication that is needed to complete documentation and make the process move forward must be done within the IMAS Portal.

<sup>3</sup> pursuant to Article 6(5) of the Law of 5 April 1993 on the financial sector, as amended ("LFS").

Information requirements for qualifying holding notifications can vary depending on the nature of each application file. Therefore, prior to the official submission of the notification, we recommend the proposed acquirers to engage in pre-notification discussions with the CSSF, in order to clarify expected information requirements, timeline and coordination for other potentially related procedures.

#### **a. Account management and registration**

Account management for the IMAS Portal is self-managed by institutions via the ECB Identity Portal<sup>4</sup>. You can find further guidance on the registration aspects under the following links:

- [How to access the IMAS Portal for the first time](#)<sup>5</sup>
- [User manual for account activation](#)<sup>6</sup>
- [Explaining the IMAS Portal: how do I access different processes](#)<sup>7</sup>

For account management and registration, SIs shall refer to ECB's letter dated 30 August 2021 addressed to the delegated access/user administrator of the IMAS Portal.

LSIs shall send the completed registration form<sup>8</sup> to the CSSF, in order to register in the ECB Identity Portal. After registration, any changes to the registration details shall be directly submitted to the ECB ([supportcenter@ecb.europa.eu](mailto:supportcenter@ecb.europa.eu)). The registration process for LSIs is flexible (there is no deadline to register) and is mainly thought to take place on a need-to-use basis.

Non-supervised entities and natural persons shall send the completed registration form<sup>9</sup> to the ECB ([supportcenter@ecb.europa.eu](mailto:supportcenter@ecb.europa.eu)).

There are no direct costs for the registration or use of the IMAS Portal.

<sup>4</sup> <https://id.ecb.europa.eu/login/>

<sup>5</sup> [https://www.bankingsupervision.europa.eu/banking/portal/imas/shared/pdf/Accessing\\_the\\_IMAS\\_Portal\\_for\\_the\\_first\\_time.pdf](https://www.bankingsupervision.europa.eu/banking/portal/imas/shared/pdf/Accessing_the_IMAS_Portal_for_the_first_time.pdf)

<sup>6</sup> [https://www.bankingsupervision.europa.eu/banking/portal/imas/shared/pdf/ECB\\_Identity\\_Portal\\_User\\_Manual\\_IMAS\\_specific.pdf](https://www.bankingsupervision.europa.eu/banking/portal/imas/shared/pdf/ECB_Identity_Portal_User_Manual_IMAS_specific.pdf)

<sup>7</sup> [https://www.bankingsupervision.europa.eu/banking/portal/imas/shared/pdf/IMAS\\_Portal-How\\_do\\_I\\_access\\_different\\_processes.pdf](https://www.bankingsupervision.europa.eu/banking/portal/imas/shared/pdf/IMAS_Portal-How_do_I_access_different_processes.pdf)

<sup>8</sup> [https://www.bankingsupervision.europa.eu/banking/portal/imas/shared/pdf/registrationform\\_banks.pdf](https://www.bankingsupervision.europa.eu/banking/portal/imas/shared/pdf/registrationform_banks.pdf)

<sup>9</sup> [https://www.bankingsupervision.europa.eu/banking/portal/imas/shared/pdf/registrationform\\_thirdparties.pdf](https://www.bankingsupervision.europa.eu/banking/portal/imas/shared/pdf/registrationform_thirdparties.pdf)

**b. Technical support**

For technical issues with the IMAS Portal (access to the portal, navigating the portal, etc.), please contact the ECB Support Center at [supportcenter@ecb.europa.eu](mailto:supportcenter@ecb.europa.eu) or +49 69 1344 7766.

The CSSF should only be contacted for questions directly related to qualifying holding or passporting notifications.

Yours faithfully,

**Claude WAMPACH**  
Director

**Marco ZWICK**  
Director

**Jean-Pierre FABER**  
Director

**Françoise KAUTHEN**  
Director

**Claude MARX**  
Director General



**Commission de Surveillance du Secteur Financier**  
283, route d'Arlon  
L-2991 Luxembourg (+352) 26 25 1-1  
[direction@cssf.lu](mailto:direction@cssf.lu)  
[www.cssf.lu](http://www.cssf.lu)