DGS Data Delivery Manual

Version: 3.1

July 2019

DeNederlandsche**Bank**

EUROSYSTEEM

Contents

1 Purpose and structure

1.1 Purpose and target group of Manual 3.1

De Nederlandsche Bank is the administrator of the Dutch Deposit Guarantee Scheme (DGS). The DGS protects the account balances of depositors (customers) and with it financial stability. A short payout deadline is key in this regard. To achieve this, it is essential that banks provide DNB in a timely fashion with reliable and accurate information on the deposits entrusted to them (single customer view – SCV). Regular validation of the data submitted ensures that the DGS operates reliably and effectively.

This Manual provides practical guidelines to help banks meet the requirements set out in the DGS legislation so as to ensure timely filing of accurate and complete data for DGS purposes. It explains how DNB exercises supervision with the aim of guaranteeing data quality.

This Manual provides managers of banks falling within the scope of the Dutch DGS with detailed functional information about the data format and filing requirements imposed by DNB so as to allow them to embed these requirements in the banks' processes. Bank staff with day-to-day responsibility for the SCV will also find that this Manual provides practical and functional guidance. All technical specifications are set out in the Data Delivery Agreement (DDA), which includes the Formal Logical Data Model (FLDM). In the event of any discrepancies between this Manual and the specifications in the DDA, the DDA is leading. Finally, this Manual serves as a reference framework for banks' internal and/or external auditors.

Which banks are covered by the Dutch DGS?
The Dutch DGS protects deposits held at:
- Banks having their registered office in the Netherlands and holding a banking licence from either DNB or the European Central Bank (ECB) (a licence as defined in Section 2:11 of the Dutch Financial Supervision Act (*Wet op het financieel toezicht – Wft*), with the exception of deposits held at a branch located outside the European Economic Area (EEA));
- Banks having their registered office in a non-EEA Member State and conducting their operations from a Netherlands-based branch and with regard to which DNB has decided that the DGS applies *mutatis mutandis* as referred to in Section 3:267(2) of the *Wft*, but only with regard to deposits held at this Netherlands-based branch.

If a bank has its registered office in another EEA Member State and offers deposit-type products on the Dutch market, whether or not through a branch, those products are not covered by the Dutch DGS. They will be covered by the other Member State's DGS.

A full list (Register) of all banks and branches covered by the Dutch DGS is available on the DNB website.

1.2 Why is a new version of the Manual being published?

The European Directive 2014/49/EU, also known as the Deposit Guarantee Scheme Directive (DGSD), states that deposit guarantee schemes must be capable of paying out within seven working days by 2024. DNB and the Dutch banks share the ambition of reducing the payout deadline to seven working days from as early as 2019. The DGS has been pre-funded since 2016 by means of a Deposit Guarantee Fund, into which banks pay levies on a quarterly basis.

Experiences with the transition to SCV-based data delivery have led to amendments to the Single Customer View Policy Rule, the Policy Rule on the Scope and Implementation of the Deposit Guarantee Scheme and the Regulation on Statements of Financial Undertakings. These experiences have also led to a new version of the Data Delivery Agreement (DDA). The requirements for auditors' reports are also explained in greater detail.
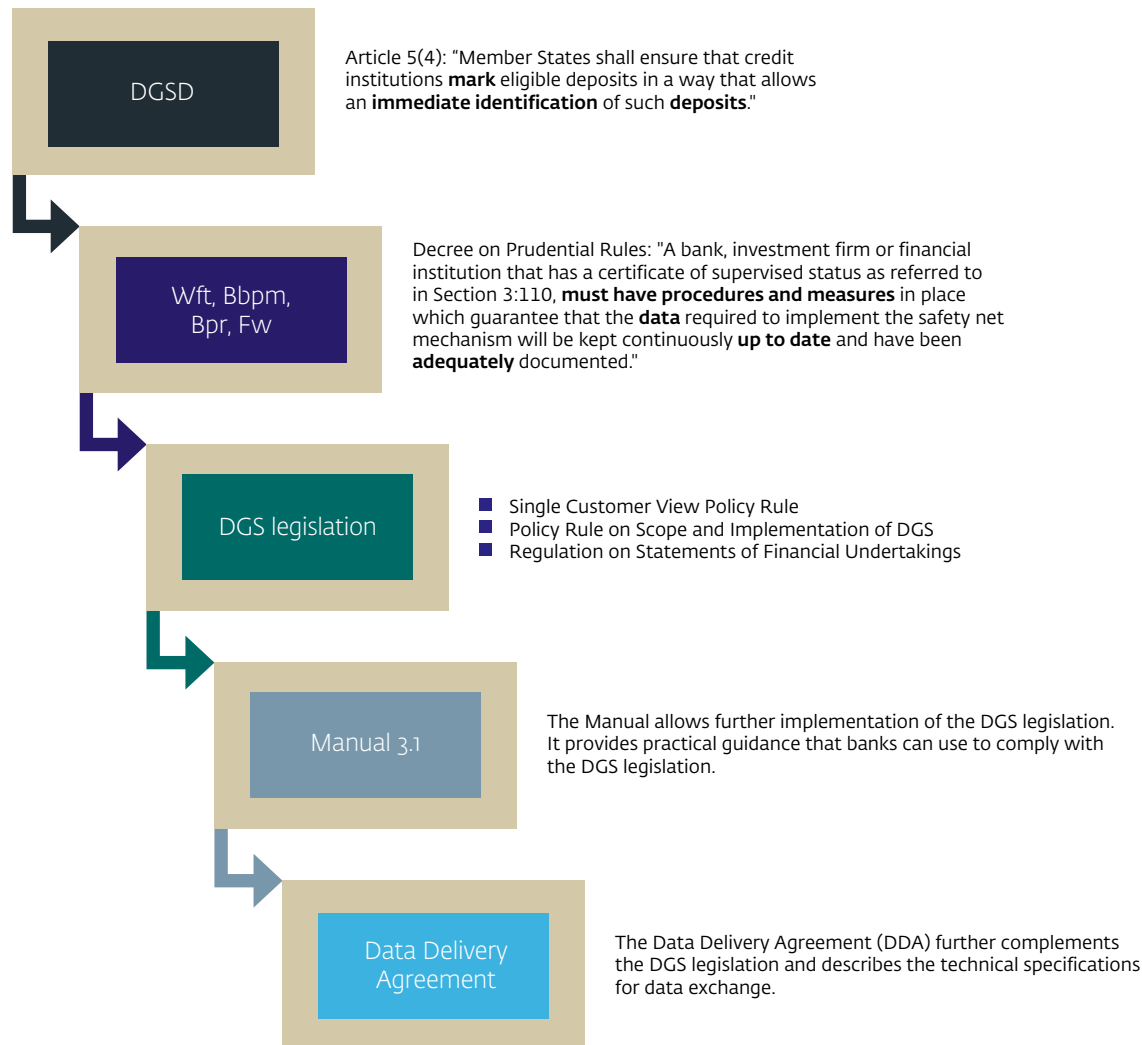
1.3 Legal framework

DGS reforms

The DGSD forms the basis for the restructuring of the DGS. The recast DGSD aims to harmonise deposit guarantee schemes across Europe in order to improve the stability of the banking sector and increase depositor protection. The Directive establishes the scope and level of protection to be afforded by the DGS, a reduced, seven-day payout deadline, ex-ante funding of the DGSs, and the cooperation at European level. In the Netherlands, the DGSD has been transposed, inter alia, into the Decree on Special Prudential Measures, Investor Compensation and Deposit Guarantees under the under the Financial Supervision Act (*Besluit bijzondere prudentiële maatregelen, beleggerscompensatie en depositogarantie Wft – Bbpm*) and the Decree on Prudential Rules for Financial Undertakings (*Besluit prudentiële regels Wft – Bpr*). Based on these two Decrees, DNB has set out further rules for DGS data reporting in the Single Customer View Policy Rule, the Policy Rule on the Scope and Implementation of the Deposit Guarantee Scheme and the Regulation on Statements of Financial Undertakings under the *Wft* (*Regeling staten financiële ondernemingen Wft* – Statements Regulation), which relates to the DGS and the Data Delivery Agreement (DDA).

Figure 1 Legal framework

DGSD

Article 5(4): "Member States shall ensure that credit institutions **mark** eligible deposits in a way that allows an **immediate identification** of such **deposits**."

Wft, Bbpm, Bpr, Fw

Decree on Prudential Rules: "A bank, investment firm or financial institution that has a certificate of supervised status as referred to in Section 3:110, **must have procedures and measures** in place which guarantee that the **data** required to implement the safety net mechanism will be kept continuously **up to date** and have been **adequately** documented."

DGS legislation

- Single Customer View Policy Rule
- Policy Rule on Scope and Implementation of DGS
- Regulation on Statements of Financial Undertakings

Manual 3.1

The Manual allows further implementation of the DGS legislation. It provides practical guidance that banks can use to comply with the DGS legislation.

Data Delivery Agreement

The Data Delivery Agreement (DDA) further complements the DGS legislation and describes the technical specifications for data exchange.

Secondary legislation governing the DGS

In the Single Customer View Policy Rule 2017 (*Beleidsregel Individueel Klantbeeld Wft 2017* – SCV Policy Rule), DNB sets out the requirements for record-keeping and the procedures and controls that banks need to have in place to create complete, accurate and timely SCV files. The SCV Policy Rule is one of the key elements underlying this Manual. Based on the SCV Policy Rule, the Policy Rule on the Scope and Implementation of the DGS provides further clarity for depositors on how certain situations that may arise during a DGS payout are dealt with, including rules on DGS protection of escrow accounts. The main additions to the policy rule concern the handling of temporary high balances, structured deposits, negative balances and situations in which customers hold deposits in multiple countries. This information is required in part for the production of SCVs. Finally, the amendment to the Statements Regulation provides more detail on a bank's obligation to submit quarterly data based on the SCVs for calculating the levies payable into the Deposit Guarantee Fund.

Single Customer View (SCV)

As part of the DGS reforms, a standard will be introduced for Dutch banks to produce and submit deposit-related data per depositor. For each depositor, the SCV must at least contain:
- a list of all deposits;
- markings to show whether the deposit and depositor are eligible for the DGS;
- any additional information necessary to enable a payout.

A bank must create an SCV for all of its depositors, regardless of whether they are eligible for the DGS. An SCV contains all of a bank's products that fulfil the definition of a deposit[1], including those whose eligibility for the DGS is unclear (see Section 2.2). The covered part of a customer's deposits is determined on the basis of the SCV[2]. Banks produce the SCVs themselves and submit them to DNB. DNB then calculates the amount payable to each depositor. This method ensures compliance with the payout deadline of seven working days.

Illustration: the DGS covers a maximum of EUR 100,000 per eligible depositor per banking licence. To calculate a depositor's claim, all eligible balances in the depositor's accounts must be added together. If a depositor has EUR 40,000 in a checking account and EUR 80,000 in a savings account, for example, proper record-keeping will show that he is entitled to EUR 100,000 rather than EUR 120,000. By requiring banks to conform to a uniform SCV standard, the DGS will be able to pay out faster. It will also improve the accuracy of banks' DGS record-keeping systems and hence the information on the eligible and covered parts of the balances.

Figure 2 shows how banks submit data on the basis of the SCV. The diagram introduces the terms "SCV file" and "SCV system". It is important for the purposes of this Manual to understand the difference between these two terms:
- **SCV file:** a data set that complies with the structure described in Section 2 of the SCV Policy Rule. The SCV file contains the single customer views of all depositors at a bank[3]. A bank uses the SCV system to compile the SCV file and overviews derived from it.
- **SCV system:** the set of procedures and measures with which a bank can compile the SCV file, calculate eligible and covered amounts (for inclusion in DGS reports, among other things) and perform resolution-related activities using a method determined by DNB and within a period set by DNB.

The definition of these terms is set out in the SCV Policy Rule[4].

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1   In accordance with the definition of a deposit in Section 1:1 of the Financial Supervision Act.
2   It is important to draw a distinction between "eligible" deposits and "covered" deposits. See the glossary in Appendix 2 and the explanation provided in Section 5.3
3   In the case of deposits held at the head office or a branch within the EEA.
4   Appendix 2 to this Manual also includes an extensive glossary.

Contribution to the resolution task

The SCV will also contribute to the preparation of resolution plans and the practicability of resolution tools where they concern deposits (see also Section 5.4), for instance when covered deposits are transferred to another bank. To allow this, banks will have to be able to separate covered deposits from non-covered deposits. This will help ensure continuous access to current accounts and other accounts.

The SCV also draws a distinction between large corporates and small and medium-sized enterprises, which is important in establishing creditor preference (the creditor hierarchy) in the event of a resolution or failure.
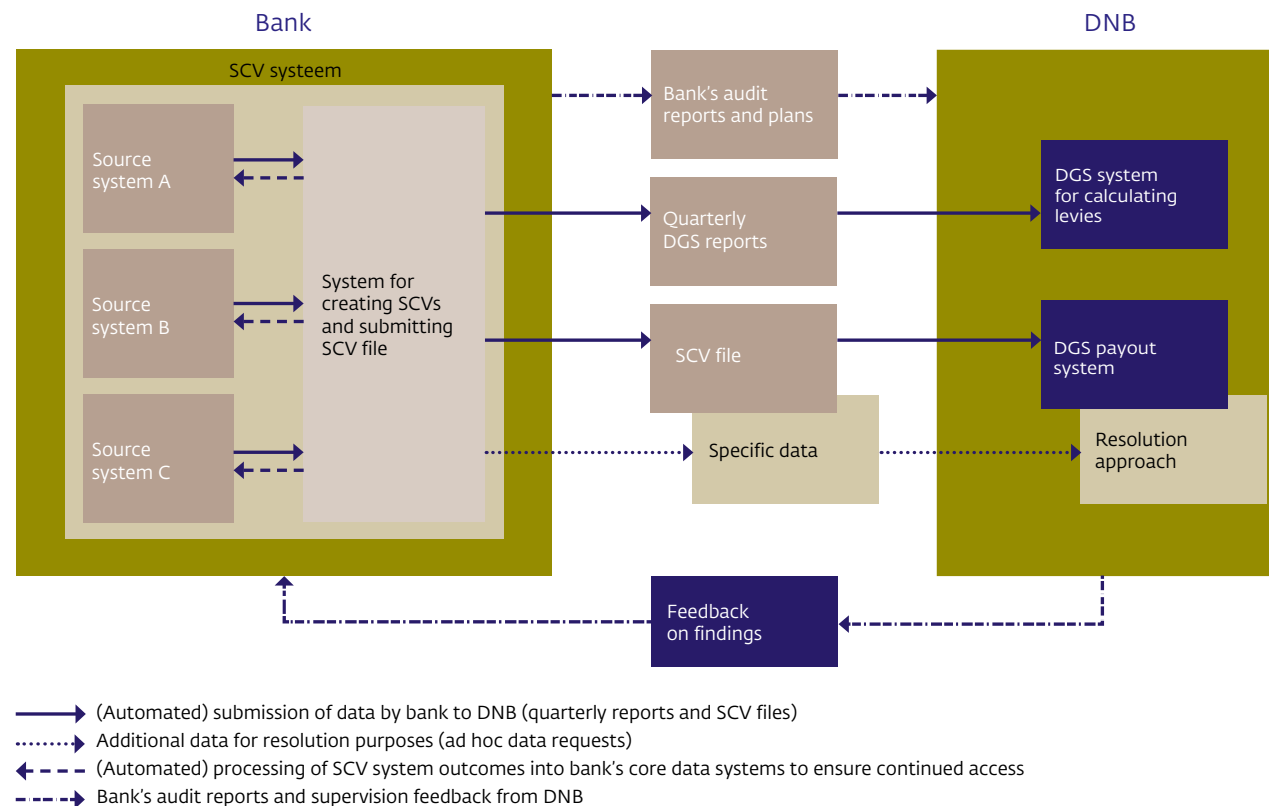If such measures are included in its resolution plan, a bank's SCV system must be designed in such a way as to allow accounts to be segregated and frozen, in support of the bank's resolution strategy. The specifications for this type of functionality will depend on the eventual resolution measure planned for a bank and are therefore beyond the scope of this Manual.

European cooperation

EU-wide cooperation means that DNB will need to adjust its processes and systems[5]. With regard to deposits held at a branch located in another Member State, DNB will need to be able to supply information

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5   Article 14 of the DGSD.

Figure 2 Data delivery based on the SCV (process flow)

→ (Automated) submission of data by bank to DNB (quarterly reports and SCV files)
┄┄► Additional data for resolution purposes (ad hoc data requests)
◄ ─ ─ (Automated) processing of SCV system outcomes into bank's core data systems to ensure continued access
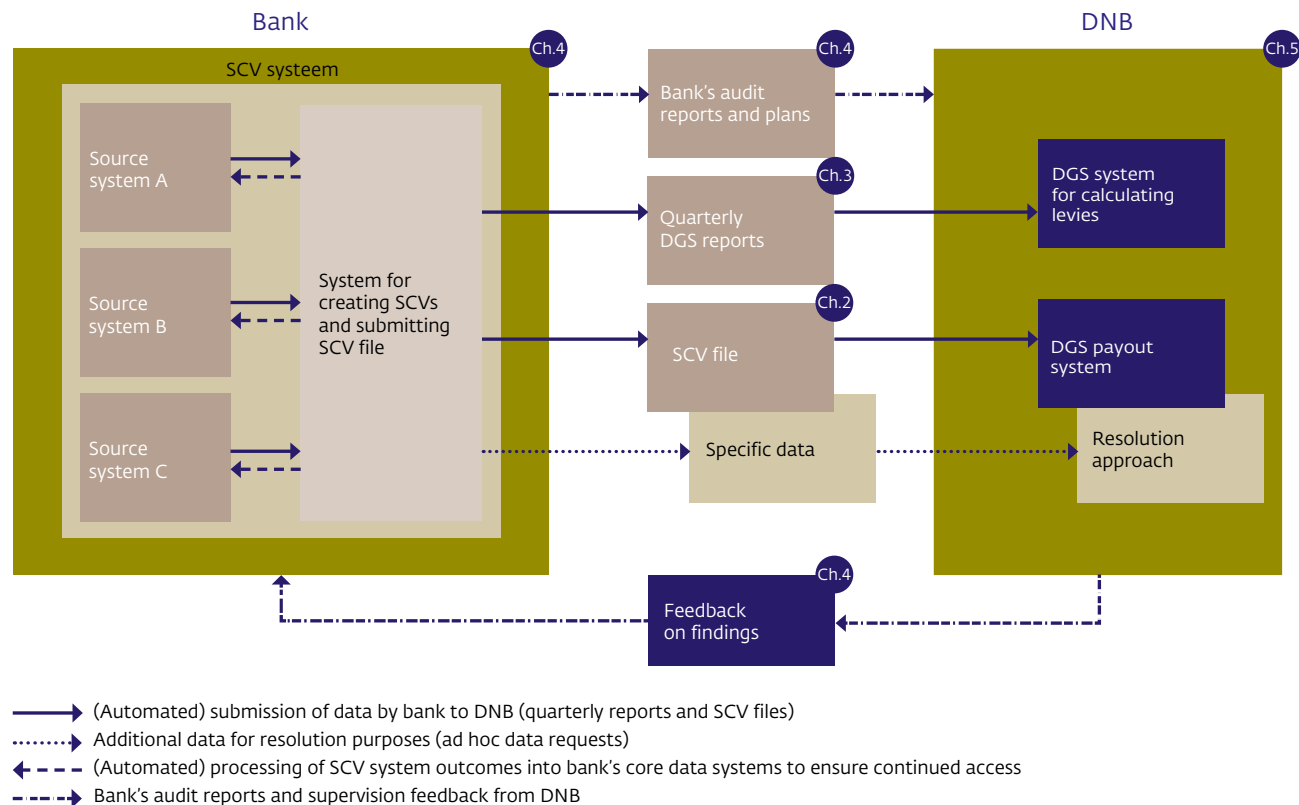─ ∙ ─ ∙► Bank's audit reports and supervision feedback from DNB

to the DGS authority in that Member State. Using the information provided, the DGS authority can then pay compensation to the depositors of that particular branch. The data submitted by banks must therefore be clear in terms of the country in which deposits are actually being held.

1.4 Structure of this Manual

This Manual is structured according to the process flow for the submission of data based on the SCV (Figure 3). It starts with the specific data to be reported to DNB for DGS purposes (the SCV file and DGS reports). Each chapter deals with a particular element of the process flow as shown in Figure 3:

- Chapter 2 describes how the SCV file is compiled and submitted and looks more closely at the basic principles underlying these requirements *(notably Sections 2, 5, 6, 7 and 9 of the SCV Policy Rule and the Policy Rule on the Scope and Implementation of the Deposit Guarantee Scheme)*[6]
- Chapter 3 considers the DGS reports *(notably Section 4 of the SCV Policy Rule and the amendment to the Statements Regulation)*
- Chapter 4 considers data quality assurance and supervision *(notably Sections 10 to 15 of the SCV Policy Rule)*

Figure 3 Process flow for data delivery and structure of Manual

> (Automated) submission of data by bank to DNB (quarterly reports and SCV files)
> Additional data for resolution purposes (ad hoc data requests)
> (Automated) processing of SCV system outcomes into bank's core data systems to ensure continued access
> Bank's audit reports and supervision feedback from DNB

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6   The Formal Logical Data Model (FLDM) and the technical aspects of data/file sharing will be detailed in a Data Delivery Agreement (DDA).

- Chapter 5 explains how and for what purposes DNB will use the submitted data
- Chapter 6 discusses the course and progress of the SCV transition *(including Section 16 of the SCV Policy Rule)*
- The appendices provide details and worked examples. Further details and technical workings can be found in the Data Delivery Agreement (DDA).

1.5 Effective date and transitional period

This Manual replaces version 3.0 and comes into force when it is published. Chapter 6 describes the progress of the transition.

1.6 Future amendments to this Manual

The Dutch Banking Association (NVB) and bank representatives have been involved in developing this Manual. DNB will arrange for a joint review of the Manual at least once every year. If the review leads to any amendments, the banks will be duly informed so that they can implement them in a timely fashion. The implementation period for major changes will be 18 months, unless agreed otherwise.

1.7 Questions and comments

Questions or suggestions about any matters covered by this Manual are greatly appreciated. Please contact DNB if you have any questions or comments about this Manual, the Data Delivery Agreement (DDA), the data model or any general questions about the DGS by sending an email to dgs@dnb.nl.

1.8 Version management

Version	Date	Nature of change	Chapter
3.0	10 July 2017	Data submission based on SCV	Entire Manual.
3.1	1 July 2019	Amended policy rule, new DDA and amendments following questions and feedback from users of the Manual and the DDA.	All chapters.

2 SCV file

2.1 Introduction

This chapter sets out the guiding principles for creating a Single Customer View (SCV), the main information to be included in the SCV file and the markings to be entered in a bank's records. It also addresses how and within what time period banks must submit the SCV files to DNB and how to deal with any corrections.

The data to be submitted as part of the SCV file must be modelled in a formal logical data model (FLDM). The FLDM provides a clear overview of the information that banks must submit and the validation rules applying to this information. If data are available for submission (provided they meet the technical requirements of the DDA), they must in all cases be submitted. The submission of some data, however, is mandatory. If data are not available for certain data fields, it is essential, partly for the purpose of data quality improvement, that the missing data are obtained, verified, recorded and submitted in the SCV file. The data quality improvement process runs until 2024, but it is expected that missing data for mandatory data fields will be obtained by 2019.

The technical specifications for data exchanges are described in the Data Delivery Agreement (DDA)[7]. These include information classification, security, the technical file formats, the chain process, the method of validation and the way in which DNB will communicate with the reporting party about the status of the submissions and the validation findings. See also Section 2.8.

2.2 Scope of data to be submitted

Which depositors are included in the SCV file?
A bank must include all its depositors in the SCV file, regardless of whether they are eligible for the DGS, with the exception of:
- Other banks, to the extent that they hold interbank deposits.
- Central banks.
- Depositors that only hold deposits at a branch in a non-EEA Member State.

The SCV file must specify for each depositor whether they are eligible for the DGS. Natural persons are eligible by definition. Eligibility in the case of non-natural persons depends on the nature of the activities (see Section 2.6.2).

The guiding principles for recording and marking customers as depositors are as follows:
- Natural persons and non-natural persons with legal personality are considered to be depositors. Single customer views must be created for them and added to the SCV file.
- Non-natural persons without legal personality (unincorporated partnerships or collaborative ventures without legal personality) are not eligible as independent entities under the DGS. When the DGSD was transposed into Dutch law, the choice was made not to treat these partnerships or collaborative ventures as eligible parties in their own right. It is their members, partners or owners who are considered to be the depositors. Examples of non-natural persons without legal personality are general partnerships, partnership firms, limited partnerships and mutual funds.
  The accounts of non-natural persons without legal personality should in principle be submitted as if they were joint accounts of the beneficiaries

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7   The Data Delivery Agreement (DDA) includes the FLDM and the DDA *document*, and it is important that the specifications of both are fulfilled at the time of implementation. The DDA, together with the Single Customer View Policy Rule and this Manual, can be found on the DNB website.

associated with these non-natural persons. For that purpose, the beneficiaries of these accounts must be identified as depositors in the bank's systems, so that an independent single customer view (SCV) can be compiled for these persons and included in the SCV file.

An SCV can only be supplied for the non-natural person without legal personality itself in exceptional cases. In such cases these accounts are marked as escrow accounts in the SCV and the escrow account policy applies. The Policy Rule on the Scope and Implementation of the Deposit Guarantee Scheme and the escrow policy section in this chapter explain in greater detail how these depositors' accounts are dealt with and included in the SCV file.

- If a depositor is a non-natural person with legal personality, one or more representatives of the depositor must be included in the bank's records. All representatives who are permitted to apply for the DGS compensation on behalf of the legal entity are included in the SCV file.
- If a depositor is a natural person who is under age or who has been placed under guardianship or otherwise declared legally incapacitated, this depositor's legal representative or representatives must be included in the bank's records.

- A depositor's (legal) representative to be included in the SCV file should preferably be a natural person. In situations in which the bank only has information available on a non-natural person acting as a representative, the non-natural person is stated as the representative. The guiding principle is that DNB needs access to as much information as possible so as to be able to pay depositors quickly.

Which products are included in the SCV file?

Products which meet the following definition are covered by the DGS[8]:

"A balance formed by moneys held in an account or arising temporarily as a result of normal banking transactions and which banks are required to repay under the applicable statutory and contractual conditions, including term deposits and savings deposits, with the exception of balances where:
- *the existence of the balance can only be demonstrated using a financial instrument, unless it is a savings product that is embodied in a registered certificate of deposit which existed in a Member State on 2 July 2014;*
- *the principal is not repayable at par;*
- *the principal is only repayable at par as a result of a guarantee or an agreement issued by the bank or by a third party*

Regardless of the balance (positive, negative or zero), the SCV file of the depositors concerned includes all products that match the above definition, including those whose eligibility for the DGS is doubtful. Other products are in principle not submitted (with the exception of bank savings deposits for a private residential property and products whose eligibility for the DGS is doubted by the bank). The guiding principle for the inclusion of products is that the depositor himself is included in the SCV file (see above in this section).

Credit card accounts must be submitted in the SCV file regardless of the balance (positive, negative or zero), provided the product conditions allow a positive balance to be held on the account.

The contractual conditions are also important in the demarcation of products in the SCV file. In the case of cash pooling products, for example, key factors are the identity of the beneficiary and the net liability to repay the balance. This may differ depending on the cash pooling arrangement. Another example concerns deposits based on Islamic principles (Sharia banking). If the product fulfils the definition of a deposit in terms of its conditions, in particular the fact that the principal is repayable at par, it is covered by the DGS.

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8   Section 1:1 of the *Wft*.

The name of a product is not always the determining factor. For example, a "subordinated deposit", although called a "deposit", is not actually a deposit according to the DGS definition, unless the conditions show that it is not actually subordinated[9].

Due to innovation in the financial sector and the arrival of FinTech, it has become even more important to test the terms and conditions of (new) products very carefully against the definition given above.

Banks are primarily responsible for determining whether a product is covered by the DGS. This should also be clearly evident from the product conditions and the information that the bank supplies to the depositor. DNB can be contacted in case of doubt. DNB will ultimately decide whether a product is covered by the DGS, in line with DNB's responsibility for granting compensation if the DGS is activated[10].

Bank savings deposits for a private residential property
Bank savings deposits for a private residential property **must** be included in the SCV file submitted. However, the DGS does not apply to bank savings deposits for a private residential property if the deposit is set off against the home loan pursuant to Section 3:265d of the *Wft*. If the balance exceeds the home loan, the depositor will need to prove this by means of documentary evidence, in which case the residual amount will be eligible for payout. This type of deposit must be included in the SCV file, but will not be deemed eligible for the DGS.

Which products are not included in the SCV file?
The following is a non-exhaustive list of examples of products which are not included in the SCV file:
- Interbank deposits: these are interbank loans in which one bank lends money to another by depositing funds, with a predetermined term and interest rate.
- Deposits held at the central bank: these may be used by central banks to curb what they consider to be overly rapid growth in lending by banks. These funds are then no longer available for banks to lend to their customers.
- Deposits held at a branch located in a non-EEA Member State: these are not covered by the Dutch DGS.[11]
- Instruments falling within the definition of "own funds" within the meaning of the Capital Requirements Regulation.
- Debt instruments issued by banks or debts arising from banks' own accepted bills and promissory notes.
- Products guaranteed by another EEA Member State, such as the Livret A guaranteed by the French State.
- Electronic money, such as pre-paid cards or money stored electronically on other physical media.
- Virtual currency, such as Bitcoin
- Seal bags that have not yet been processed
- Insurances
- Financial instruments, such as swaps and derivatives
- Bearer bonds

2.3 Reliability of SCV and deduplication of depositors

This section describes the importance of a reliable SCV and the resulting requirements for the deduplication process in banks. The reliability of the SCV constitutes the essence of the SCV file. The SCV Policy Rule[12] explains that the bank's procedures and measures must be arranged in such a way as to guarantee the accuracy and completeness of both the data required for the compilation of single customer views and the data in the single customer views themselves. A high degree of reliability of SCVs is only achieved if the entire chain operates effectively (from the bank's core

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9   This was the case, for example, with the "subordinated deposits" of DSB in 2009/2010.
10 In accordance with Section 29.06 of the Decree on Special Prudential Measures, Investor Compensation and Deposit Guarantees under the Financial Supervision Act.
11 Deposits of a depositor resident in a non-EEA Member State but held at the head office or EEA branch are therefore included.
12 See Chapter 5, Data Quality Assurance, in the SCV Policy Rule.

processes through to the generation and submission of the SCV file to DNB). The control of the necessary business processes must focus on avoiding errors ("zero tolerance of errors"). This makes high demands of the bank's SCV system. It starts with proper identification of the depositors and full and accurate recording of identifying data ("customer onboarding" and "KYC"). The quality of customer deduplication within and across systems then ensures that a reliable SCV is compiled for each customer. The more complex a bank (multiple systems, EEA branches, multiple trade names operating independently), the more important a good deduplication process is.

Why is the reliability of an SCV important? DNB can only pay out rapidly to a depositor if the reliability of an SCV can be guaranteed to a high degree. This requires a bank to determine the identity of a depositor with a high level of certainty[13]. The bank's SCV system must ensure that:

i) under no circumstances can two or more SCVs be included for a single depositor (which could result in the depositor receiving excessive compensation) or;

ii) under no circumstances can two or more depositors be included in a single SCV (so that the wrong person receives compensation).

The bank itself also has an interest in proper dedupli-cation of customers. Although non-deduplicated SCVs must be marked as "unreliable", these SCVs are included in the determination of the deposit base for the calculation of the levy for the Deposit Guarantee Fund (see also Chapter 3). The SCV Policy Rule specifies that each SCV (i.e. including "unreliable" SCVs) must be included as an independent SCV in the determination of the covered amount. If SCVs are not deduplicated, there is a risk that the combined covered amount will exceed EUR 100,000. This provides an incentive for efficient deduplication.

If the bank has doubts about the reliability of deduplication or the combination of accounts in SCVs, the bank will mark the SCV in the SCV file with "Reliability not guaranteed". There are various permitted combinations of identifying details on the basis of which a customer's identity can be established with certainty for SCV purposes. Such a combination of

details is known as the "golden triangle". The most common example is: Citizen Service Number (BSN) + Birthname + Date of birth. See Appendix 6 for possible combinations of identifying details on the basis of which a bank can establish a customer's identity with sufficient certainty.

The "reliable SCV" marking in the SCV file must be validated in two steps (see Appendix 7):
1. Does the SCV contain at least one full set of the combinations of identifying details listed in Appendix 6?
2. Are all the identification numbers combined with the issuing country in the SCV file (such as BSN, CoC number, foreign identification number and bank relation number[14]) unique in the overall SCV file?

However, validating the SCV file will not be sufficient to fully ensure the reliability of the individual SCVs included in the file, as an error may have been made when creating the SCVs in the bank's SCV system. If two customers (from separate sets of records) are combined incorrectly, this could create what appears to be a "reliable SCV". Validating the SCV file will not detect this error.

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13 In connection with the requirement in Section 29.01(2) of the Decree on Special Prudential Measures, Investor Compensation and Deposit Guarantees under the *Wft* that a depositor must have identified himself.
14 The requirement that the bank relation number is unique in the SCV file applies only if it is used as an identifier for the compilation of SCVs. In that case, the bank must ensure that all its accounts and records use unique customer numbers. Prior consent for the use of this method must be obtained from DNB.

Two examples of a possibly incorrect combination of SCVs in the SCV file:

Example 1
Take the following customers from a bank's various customer systems:

BSN	Date of birth	Surname at birth
477216912	01-02-1950	Peeters
477216912	-	Peeters
477216912	02-02-1950	Peeters
477216912	02-02-1950	Peters

The bank might combine these customers into a single SCV:

BSN	Date of birth	Surname at birth
477216912	02-02-1950	Peeters

The combined SCV in this example would then be based on the most commonly occurring "date of birth" and "surname at birth". But even then there is not sufficient certainty that this combination is actually correct. One of the databases may contain a typing error in a BSN, date of birth or surname, but this must first be established with certainty and corrected in the customer systems.

Example 2
Take the following customers from a bank's various customer systems:

BSN	Date of birth	Surname at birth	Foreign TIN
477216912	01-02-1950	Peeters	Country A: 80012345
477216912	01-02-1950	Peeters	Country A: 80012349

The bank might combine these customers into a single SCV:

BSN	Date of birth	Surname at birth	Foreign TIN
477216912	02-02-1950	Peeters	Country A: 80012345

The combined SCV in this example would then be based on a single "golden triangle", namely BSN, date of birth and surname at birth. But even then there is not sufficient certainty that this combination is actually correct, because the foreign TIN of issuing country A differs in the records. One of the databases may contain a typing error in one of the TINs, but this must be established with certainty and corrected in the customer records.

In view of the differences between banks, the banks themselves are responsible for establishing a system to deduplicate customer records. The guiding principle in the compilation of SCVs for the ultimate SCV file is that customers with differences in identifying data (or possible combinations of such data) cannot be combined without further assessment (check of entries in the customer file or KYC). See the above examples.

Customer deduplication also affects other (non-identifying) data. There may be differences between data in different sets of records (for example as a result of spelling errors in an address) or certain data may occur several times (multiple telephone numbers, multiple addresses). Many of these details, however, can only be supplied once in the SCV file. The deduplication of this data is the bank's responsibility. A bank must guarantee, however, that the data in the SCV file is accurate and up to date.

2.4 Structure of the SCV file

The FLDM describes which data banks must submit and how they must be structured. This FLDM ensures a uniform method of submission, regardless of the bank's organisational structure. Correct implementation of the FLDM ensures that all banks are able to submit DGS data uniformly, making a seven working day payout a feasible goal.

The following sections explain the required data in more detail for the banks' management and staff involved with the DGS. They do not include an exhaustive list or specification of all data fields. Please consult the FLDM and the DDA document for detailed information.

Figure 4 shows a simplified version of the data model. The full FLDM is a mathematically precise model that forms the basis of the technical specifications for the data delivery. The FLDM also creates the possibility of automating certain parts of the technical implementation.

The simplified model shown in this chapter explains two key aspects of the main data blocks: how the data elements are structured relative to each other (by means of the model in Figure 4) and how the required data should be interpreted.

The data to be supplied are roughly divided into the following data blocks:
- **Bank:** this block states which banking licence relates to the data delivery.
- **Party:** this block contains the identifying data of the depositors and representatives. A distinction is drawn between natural persons and non-natural persons. The party may have one of the following roles:
  a. **Depositor:** the holder of the deposit (beneficiary)
  b. **Representative:** the depositor's representative. Contact details are recorded for each party, including the address.

Figure 4 Conceptual data model for SCV file
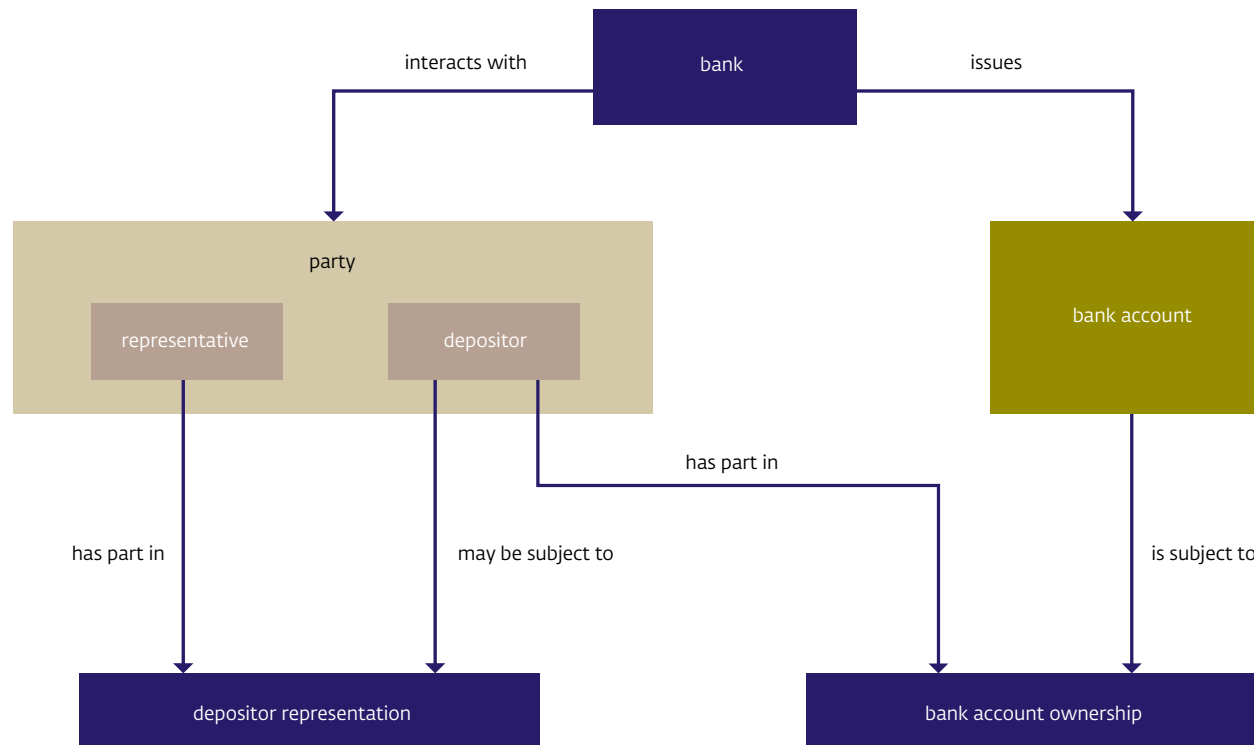
- **Depositor representation:** this block contains the link to the correct (legal) representative(s) of each depositor whose representation is documented in the bank's records. Parties with the role of "representative" can only be linked to parties with the role of "depositor" and not to accounts.
- **Bank account ownership:** since an account may have multiple depositors or a depositor may have multiple accounts, this block contains the link between the account and the depositor. Accounts can only be linked to parties with the role of "depositor", not to parties with the role of "representative".
- **Bank account:** this block contains all the details of the deposit.

The following sections provide further guidance on the data to be submitted.

2.5 Bank

DNB can uniquely identify the bank on the basis of the bank's RIAD code entered in the "bank identifier" field. The RIAD code is the banking licence number issued by DNB or the ECB. Details of the correct use of the RIAD in the submission can be found in the DDA.

The date on which the DGS was activated for the bank is stated in the "reporting reference date" field. This date is stated in the delivery obligation in the Digital Reporting Portal. The "reporting reference date" must be uniformly applied throughout the submission.

2.6 Party

2.6.1 General information
All natural persons and non-natural persons, irrespective of whether they are depositors or (legal) representatives, are included in the SCV file as a "party". The terms "depositor" and "representative" are explained below:
- **Depositor:** the person who is entitled to all or any part of the funds deposited at a bank. In many cases, the depositor and the account holder will be one and the same person. See Section 1(i) of the SCV Policy Rule and accompanying notes.
- **(Legal) representative:** a person who is authorised to act on the depositor's behalf, but who personally has no right to the funds (see Section 1(j) of the SCV Policy Rule and accompanying notes). A person representing a natural person is referred to as a "legal representative". This may be someone who has been appointed by the courts to represent a legally incapacitated person. The parent of a minor child will usually be the child's legal representative. The

representative of a non-natural person is referred to as a "representative". This type of representation must be formalised in the organisation's charter or its registration with the Chamber of Commerce. It is important to draw a distinction between the role of "representative" and that of an "authorised agent". An authorised agent may, for example, be a member of staff in the accounting department who is authorised to make payments to suppliers on behalf of a legal entity. Authorised agents cannot apply for any compensation under the DGS and therefore cannot be included as representatives in the SCV file.
- **Natural person:** a person (of flesh and blood) who has legal status as an individual.
- **Non-natural person:** an organisation or collaborative venture with legal personality (see Section 2.2 for further guidance on data delivery regarding non-natural persons without legal personality). A non-natural person must be represented by one or more representatives authorised to act solely or jointly.

Sections 2.6.2 and 2.6.3 then provide explanatory notes on the submission of data on depositors and (legal) representatives. A distinction is drawn between natural and non-natural persons where relevant. A number of generic fields for parties in the FLDM are first explained below.

Field	Notes
Party identifier	This field must be unique for depositors within the overall data submission and forms the basis of the SCV file. Each individual SCV must have its own, unique "party identifier" in the SCV file. Since the "party identifier" is used in unencrypted form in the validation reports, it must not contain any data that can be traced to the customer (or hashes of such data), such as the BSN.
Party role	As stated above, a party can have the role of "depositor" or "representative". There are also situations in which a party can have both roles. For example, a parent may be the legal representative of a minor, but may also have a private account at the failed bank. In that case a party role must be included twice for this party: 1x the role of "depositor" for his private account and 1x the role of "representative" for the representation of his minor child. A party with the role of "representative" can only be linked to a "depositor" in the SCV file, not to accounts, since a (legal) representative represents a person or a legal entity and can therefore act on behalf of the person or legal entity for all of the latter's accounts. It follows that only a party with the role of "depositor" can be linked to an account in the SCV file.

2.6.2 Depositor

Marking of SCV reliability
Section 2.3 deals with the reliability of the SCV in relation to the identification and deduplication of customers (the depositors). If a bank doubts the reliability of an SCV, this is recorded by means of a marking in the Data Model. If this marking is set to "twijfel" (doubt), DNB will not pay out automatically to the depositor.

Identifying data
This section provides a more detailed explanation of the recording and submission of identifying data.

When compiling the SCV of a **natural person** at least one of the following data items must be recorded for this person:
- **BSN:** mandatory in the case of a Dutch resident.
- **Buitenlands TIN (foreign TIN, or Tax Identification Number):** for identification of non-residents.
- **Buitenlands nationaal ID (foreign national ID):** for identification of non-residents. A condition is that it must be a unique identifier in the country of origin, as in the case of the BSN for Dutch residents.

These data are submitted in the data model in the "natural person identification" block. If several such identifying data items are available for the same natural person (for example a BSN and a foreign national ID in the case of dual nationality), all available data must be submitted.

The BSN can have a length of eight or nine digits. Eight-digit BSNs must be preceded by a leading zero. For example, BSN "12345678" must be submitted as "012345678". The BSN must also pass the 11 test.

As well as submitting the above formal identification numbers, banks must supply the available ID document data for natural persons. This gives DNB an additional means to identify persons if necessary. The submission of ID document data is mandatory if banks do not have a formal identification number for the person. The data that can be submitted (see the "identification by document" block in the data model):
- **Paspoort (passport):** the document number of the passport.
- **ID:** some Member States also allow other types of valid proof of ID in addition to a passport, such as an identity card.
- **Rijbewijs (driving licence):** the document number of the driving licence.
- **Verblijf (residence):** residence permit number. Some Member States allow a residence permit to be used as a valid proof of ID.

For each of the fields submitted, the bank must also supply the country code of the country that issued the document concerned. "Issuing country" means the country to which the document relates. For example, in the case of a Dutch passport issued by the Dutch Embassy in France, the issuing country is entered as "NL".

Since these documents have a limited validity period, there is a risk that the data may no longer be up to date. Such data cannot therefore be used as a basis for an SCV. Banks are expected to obtain the formal identifying data as part of their data quality improvement, so that the identity of the customer can be determined with a high degree of certainty for the SCV.

If the natural person has been identified in the SCV file by means of a BSN, TIN or foreign ID, but additional document data are also available, banks must also supply such additional data.

Dutch residents under the age of 14 often do not have an identity document but are issued with a BSN. In that case they are identified by means of the BSN.

In addition to identification numbers and documents, there are other identifying data, such as name, date of birth, etc. The table below provides further guidance on some of these data items.

Field	Notes
Official first names	Official first names as recorded in the identity document. Mandatory in determining the golden triangle if "Birth name" is not available.
Birth name	Official surname as recorded in the identity document. Mandatory in determining the golden triangle if "Official first names" are not available.
Unofficial first names	In this field it is possible to enter the person's preferred name, for example if the bank is unable to ascertain the official first names with certainty. The "official first names", as stated in the depositor's identity document, should preferably be obtained. If a bank does not have these, however, we will in any case need "initials" or "preferred names". One of these three is therefore mandatory. A bank may of course complete all fields if it has them.
Date of birth	This is a mandatory field. Dates from 1 January 1900 up to the date of the failure of the bank are accepted. There are of course people whose date of birth is unknown or whose year of birth is the only detail known. This used to be documented in the Municipal Personal Records Database in the following format: "<YYYY>00-00", for example "1966-00-00". This is accepted as a valid format. This format may also be used for foreign-based customers with an incomplete date of birth. In those cases, it will need to be converted into the format referred to above for SCV filing purposes.

For **non-natural persons** it is mandatory to supply one of the following identifying data items. The inclusion of non-natural persons without identifying data is not permitted.

- **KvK (CoC):** Dutch Chamber of Commerce registration number.
- **RSIN:** Dutch legal entities and partnerships identification number.
- **Buitenlands KvK (foreign CoC):** Foreign Chamber of Commerce registration number.
- **Buitenlands TIN (Foreign TIN):** Foreign taxpayer identification number.

There are various types of organisation with legal personality that do not have to be registered with the Chamber of Commerce, such as religious communities. These organisations are nevertheless required to have an RSIN. This can then be supplied as an identifier.

Other identifying data of non-natural persons are:

Field	Notes
Registered name, place and country	In these fields it is necessary to enter the legally registered name, registered office (city) and country of establishment of non-natural persons with legal personality as included in the CoC registration or articles of association.

Marking for eligibility for DGS

Under the DGSD most of a bank's customers are now eligible for the DGS. There are exceptions, however.

The following depositors are not eligible:

- Banks, if the deposits are held by a bank in its own name and for its own account;
- Financial institutions;
- Depositors who have not identified themselves in accordance with Section 4(1) of the Dutch Anti-Money Laundering and Anti-Terrorist Financing Act (*Wet ter voorkoming van witwassen en financiëren van terrorisme – Wwft*).
- Insurance and reinsurance undertakings as defined in Article 13(1) to (6) of the Solvency II Directive;
- Investment firms;
- Investment funds, managers of investment funds, undertakings for collective investment in transferable securities (UCITS) and UCITS managers;
- Pension funds;
- Public authorities.

Ascertaining whether a depositor is eligible is primarily the responsibility of the bank. Appendix 5 provides a list of definitions of ineligible parties, including a tool for banks to establish eligibility/ineligibility.

The standard industrial classification (SBI code) used by the Chamber of Commerce can serve as a guide but not as a firm basis for determining eligibility:

- For some SBI codes, eligibility is ambiguous.
- The Chamber of Commerce registration is not always reliable.
- Banks should also assess any secondary activities.

They must determine the classification of an organisation in the KYC process and therefore ask specific questions to determine the actual activities. For that reason the SBI code cannot be part of the data model.

The eligibility marking can be recorded in the "eligible depositor" field of the SCV file.

Marking for capacity of depositor

The SCV file must state whether the depositor is able and permitted to conduct legal acts independently. If not, the representative of the depositor must be included. The "unqualified depositor" value in the "depositor qualification" field states that the depositor is not able or permitted to perform legal acts independently.

The following are considered to be "unqualified depositors":

- Minors, persons under guardianship or otherwise declared legally incapacitated.
- Non-natural persons.

Deceased depositors

Balances on the accounts of deceased depositors are not paid out automatically. If depositors are deceased, this is entered in the "vital status" field. Representation of deceased depositors can in principle be included in the SCV file, but settlement will take place manually after DNB has identified the heirs on the basis of the necessary evidence.

Depositors designated as "deceased" are included in the SCV file as "qualified depositors" and as eligible for the DGS provided the depositor was eligible for the DGS while alive. Although deceased depositors cannot receive DGS compensation, the heirs are eligible. Section 4 of the SCV Policy Rule therefore does not mean that the "eligible_depositor" indicator must be set to "no DGS", because then the heirs would be erroneously deprived of compensation. This indicator must be completed "as if the depositor were still alive".

Lack of legal personality

Although forms of organisation without legal personality cannot in principle be entered as depositors, exceptions are possible. A field has been created in the SCV file in which the "legal capacity" of non-natural persons must be entered.

A particular example of a non-natural person without legal personality is a legal entity in formation, such as a "B.V. in oprichting" (private limited company in formation). These non-natural persons are included in the SCV file with a marking showing that they have no legal personality. The accounts of these non-natural persons must be marked as escrow accounts (see Section 2.7).

The bank determines whether a non-natural person has legal personality. The data from the Chamber of Commerce register can be used as a guide. In the case of foreign forms of organisation it may be difficult to determine whether they have legal personality. The bank must be able to make this assessment (KYC).

Language marking for outward service passport

Article 8(7) of the DGSD states that where a bank operates in another EEA Member State under a European passport for cross-border services, deposit guarantee schemes must provide information in the language selected by the depositor at the time of opening the account. A bank is therefore requested to state in the SCV file whether a deposit is held in another Member State where no branches are established (and hence is covered by the European passport for services). In that case, the bank must state the country concerned and the language which the depositor selected when opening the account. For example, a bank that does not have any branches located in France, but does actively take deposits there via a French language website (and consequently also communicates with the customers in French), would submit the language code for French.

One language per depositor is entered in the SCV file. Language codes are included in the data model for the formal languages used to communicate within the EU. Since banks often do not specifically ask customers to select a language, they can also enter here the language used in practice to communicate with the depositor. This information is mandatory if cross-border services are applicable to at least one of the deposits in the SCV. A further principle is that Dutch (NL) is entered if one of the languages is NL.

Determination and submission of customer category (enterprise size)

The customer category field for non-natural persons has been included to determine the creditor hierarchy when banks are placed into resolution. The following customer categories are distinguished:
- Micro, small and medium-sized enterprises ("SMEs"); or
- Large companies ("Corporates").

This distinction between SMEs and Corporates is based on the definition given in the Bank Recovery and Resolution Directive (BRRD), which has been transposed into the Dutch Bankruptcy Act (*Faillissementswet – Fw*):

"Micro, small and medium-sized enterprises: enterprises as defined based on the annual turnover criterion referred to in the Commission Recommendation of 6 May 2003 concerning the definition of micro, small and medium-sized enterprises (OJEU 2003, L 124/16);" (*Section* 212g(1)(n) of the *Fw*).

2.6.3 Representation and (legal) representative

In all cases in which the depositor is a minor, a legally incapacitated person or a non-natural person with legal identity, banks must supply the details of one or more (legal) representatives. As a rule, a (legal) representative is a natural person. In the case of a non-natural person with legal personality, its representative must be shown in the company's Chamber of Commerce registration or articles of association. An authorised agent will specifically not qualify as a representative.

Details of all representatives that are permitted to request compensation under the DGS on behalf of the legal entity must be submitted in accordance with the specifications in the FLDM.

In the case of representatives of a non-natural person with legal personality, the authority will be recorded in the CoC registration or articles of association. The following forms are distinguished:

- **Volledig bevoegd (fully authorised):** the application for compensation under the DGS only has to be endorsed by one fully authorised person.
- **Gezamenlijk bevoegd (jointly authorised):** If an organisation only has jointly authorised persons, the application for compensation under the DGS must be endorsed by all jointly authorised persons.

The powers of all representatives must be submitted.

Joint authority only applies in the case of representation of non-natural persons with legal personality. Legal representatives of natural persons always have full authority.

2.6.4 Contact details

Further details of a number of data fields relating to communication with customers are provided below.

Telephone numbers

It is mandatory to enter either a landline telephone number (in the "Telephone number" field) or a mobile telephone number (in the 'Mobile number' field). Since the bank itself can choose which of the two fields to complete, neither has been made mandatory in the FLDM.

Address

The payout deadline of seven working days makes high demands on the quality of the address data. As soon as possible after the DGS comes into force, depositors or their representatives must be informed individually of their right to request compensation (provided the depositor is eligible). It is no longer sufficient simply to publish advertisements in media, as there would then be a risk that depositors could successfully argue that they were not paid in time because they missed the advertisement.

Address details may be included in the SCV file in either of two ways:
- Structured address details (block: Structured address): this is the standard form and is intended to be used for address details entered by the bank in the individual fields or which may be traced back to those fields.
- Unstructured address details (block: Unstructured address): This form can be used for address details entered in address lines that can no longer be traced back to the individual fields (such as foreign addresses).

It is strongly recommended that addresses are entered in structured form to the extent possible for purposes of customer contact, addressing of letters and other processing of address details.

The recording of private addresses of representatives of non-natural persons is often laborious and error-prone. For practical purposes the official address of the non-natural person can be entered for representatives. The bank itself must assess, however, whether this is sensible and feasible, for example if a natural person has multiple roles (depositor and representative) or is linked as a representative to multiple non-natural persons with different addresses.

2.7 Account and account ownership

Identification of accounts in the SCV file

Individual bank products (also referred to as accounts or deposits) must be recorded in a clear and uniform way in the SCV file. The following fields are used.

Field	Notes
Bank account identifier	As a supplement to the requirements in the DDA, this field must not include any data (or hashes of such data) which can be traced back to customers, such as the IBAN. This is because the "bank account identifier" is included in unencrypted form in the validation report and is made available to the bank through the DLR after the SCV file has been processed
Product label	The previous version of the data model included an "account label" field. Since this field refers to the specific product that the depositor holds with the bank, it has been renamed "product label".

Product categories

For SCV purposes, accounts (deposits) are classified into product categories (as referred to in Section 5(2) of the SCV Policy Rule). A standard classification of products has been defined to determine the type of products involved. These are:

Type	Code
■ Current account	REK-BETAAL
■ Savings account	REK-SPAAR
■ Fixed-term deposit	REK-TERMIJNDEP
■ Investor account (cash account)	REK-BELEG
■ Bank savings deposit for a private residential property	REK-WONING
■ Other tax-efficient savings accounts	REK-FISCAAL
■ Credit card account	REK-CREDITCARD

Definitions of these product types can be found in Appendix 4.

Escrow accounts

A third party is entitled to compensation under the DGS if it meets the following conditions[15]:
■ The account holder holds a deposit for the third party's benefit pursuant to statutory or contractual provisions that already existed before the date of insolvency and which apply to the relationship between the account holder and that third party;
■ The bank knows the third party's identity, unless the account holder has a professional record-keeping system in place, in which case it will be sufficient for the bank to know that one or more third parties are involved;
■ DNB can establish the third party's identity and the level of the third party's claim on the basis of information available before the date of insolvency.

The Policy Rule on the Scope and Implementation of the Deposit Guarantee Scheme provides a definition of a "professional record-keeping system". The Policy Rule also covers how to apply the third-party policy to groups without legal personality.

If the third parties are administrated using a professional record-keeping system, DNB will make enquiries of the system's administrator. These accounts must be included in the SCV file as escrow accounts held for "client" (customers). Examples include escrow accounts administrated by notaries or court bailiffs. In exceptional cases accounts of non-natural persons without legal personality (e.g. a general partnership) may also be treated as escrow accounts. This will be necessary if the beneficiaries have not been included in the bank's database as depositors in their own right.

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15 See Section 29.02(3) of the *Bbpm*: "If a depositor holds a deposit in his own name, but does so for the benefit of another party under a contract or statutory requirement, it is the third-party beneficiary that enjoys protection and is treated as the depositor, provided that its identity can be established before the date when it is decided to activate the deposit guarantee scheme."

In those cases, the attribute "type of third party account" must specify that this is an escrow account held for a non-natural person without legal personality (value: "Samenwerkingsverband" (collaborative venture).

Particular attention should be devoted to escrow accounts of financial undertakings, such as banks, financial institutions or investment firms. Although financial undertakings themselves are ineligible for the DGS, another rule applies to escrow accounts in the name of these undertakings. For the operation of the DGS, the principle applied by DNB is that the ultimate beneficiaries of these accounts (the third parties) must be identified. If these beneficiaries are eligible for the DGS, DNB will make a payout to them as third parties despite the ineligibility of the account owner (the financial undertaking). It is therefore important that banks also record the escrow accounts of financial undertakings. Financial undertakings are also considered to be administrators of a professional record-keeping system.

If the third parties are eligible for the DGS, each will be entitled to compensation based on its share of the escrow account, subject to a maximum of EUR 100,000 per person. If the third party has already received DGS compensation for accounts it holds with the failed bank, then that will be taken into consideration when calculating its entitlement.

The maximum seven-day payout deadline may be deviated from for escrow accounts and blocked deposits, as stated in Article 29.05 of the DGSD. The marking for an escrow account is included in the SCV file as follows.

Field	Notes
Type of third party account	Field showing whether the deposit is held for the benefit of a third party. Possible values: ■ "Client": if the identity of the third parties is evident from: 1. the records of the bank concerned or 2. a professional record-keeping system operated by the account holder (e.g. the beneficiaries of a notary's clients' account). ■ "Samenwerkingsverband" (collaborative venture): if the owner of the account is a non-natural person without legal personality. ■ "Geen derdenrekening" (not escrow account): all accounts which are not escrow accounts. It should be noted that the "Samenwerkingsverband" (collaborative venture) type can only be used in exceptional cases. The preferred approach for entering forms of organisation without legal personality is described in Section 2.2.

Example

A notary's escrow account with a balance of EUR 500,000 and four beneficiaries included in the notary's professional record-keeping system.

Beneficiary:
1 owns EUR 80,000 of the account balance
2 owns EUR 120,000 of the account balance
3 owns EUR 95,000 of the account balance
4 owns EUR 205,000 of the account balance

Assuming that none of the beneficiaries themselves have an account with the failed bank, compensation will be paid as follows:

Beneficiary:
1 receives EUR 80,000
2 receives EUR 100,000
3 receives EUR 95,000
4 receives EUR 100,000

Beneficiary 2's residual claim of EUR 20,000 and beneficiary 4's residual claim of EUR 105,000 will be left in administration. They will need to pursue the matter with the liquidator.

Marking showing whether products are eligible

In the SCV file a bank marks whether a product is eligible for the DGS, separately from the question of whether the depositor is eligible. Since the products included in the SCV file in principle fulfil the definition of deposit included in Section 2.2, most products in the SCV file can be designated as eligible for the DGS. If a bank has doubts about whether a product is eligible, it must include this product in the SCV file with the marking "twijfel" (doubt). In principle this marking should not actually be applied, since banks have a legal requirement to inform all depositors annually whether they are eligible for the DGS with regard to each product. This information must therefore be available within the bank.

There is one product that the bank always marks as "Geen DGS" (not eligible for DGS). This is the "Bankspaardeposito eigen woning" (bank savings deposit for a private residential property).

A marking for eligibility should be uniform for the entire product. That means that if a bank markets a product called the "XBank rainy day account", for example, accounts with this product label must either all be designated as "DGS" or all as "GEEN_DGS" (NO_DGS). It is not possible for the same product to be eligible for the DGS in one case and ineligible in the other. Eligibility must be the same for the entire product. That means that if a bank provides the "XBank rainy day account", for example, accounts with this product label must either all be designated as "DGS" or all as

Figure 5 Illustration of the payment process
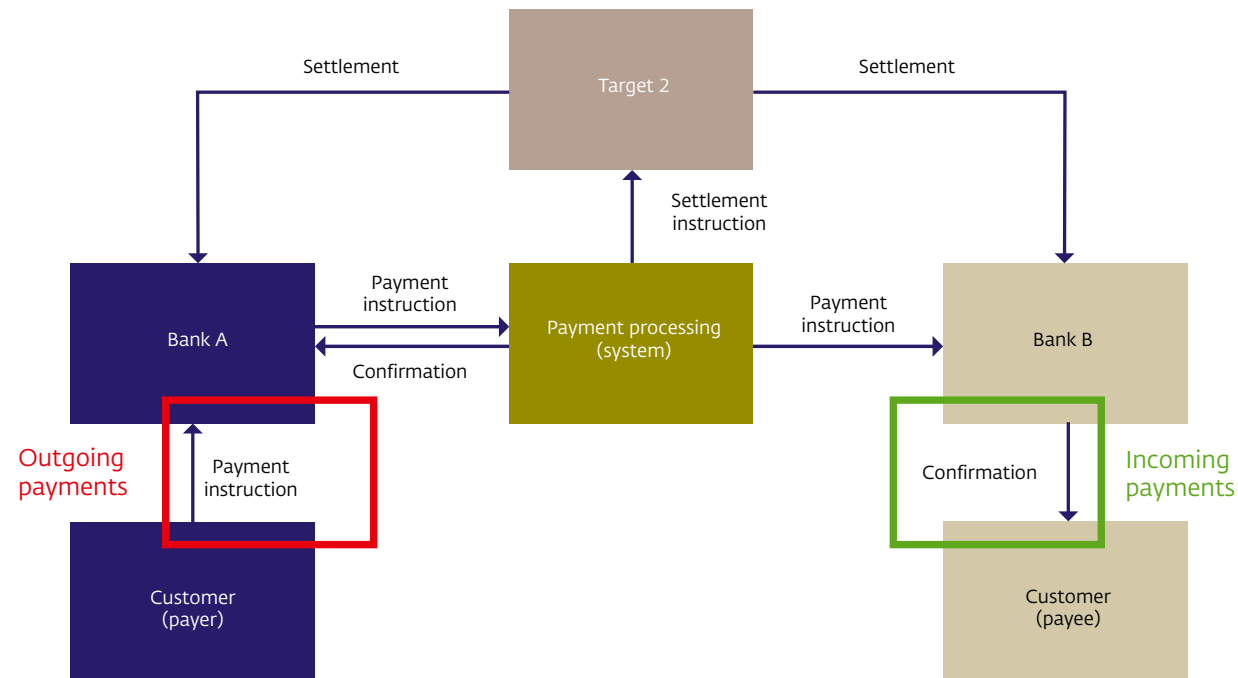
"NO_DGS". It is not possible for a product to be eligible for the DGS in one case and ineligible in the other.

Determining the balance

A bank must be able to determine the balance of a deposit reliably at any time. Depositors have the right to expect banks to calculate account balances uniformly at the cut-off time (in an actual payout situation this will be the point in time when the DGS is activated). Guidance on the processing of in-flight transactions is given below.

How to deal with in-flight transactions when calculating an account balance

The SCV Policy Rule sets out the guiding principles for dealing with in-flight transactions when calculating the account balances that need to be included in the SCV file. "In-flight transactions" are payments where not all the underlying cash movements making up a transaction have been settled in full. Figure 5 illustrates the payment process.

To calculate an account balance for DGS purposes, banks must adhere to the following principles:
a) All outgoing payments that have already been debited at the time of creating the SCV are not included in the account balance. Even if those payments are still held in a suspense account, they do not count towards the account balance to be included in the SCV.
b) Incoming payments must be included in the account balance wherever possible, taking into account the period for submitting the SCV file (three working days). These are payments such as those referred in the Settlement Finality Directive (which has been transposed into the Dutch Bankruptcy Act).

For the purposes of assessing and improving data quality and the accurate and timely delivery of SCV data, and to calculate the account balances, a bank will take as a reference point the moment after the night batch has been processed. The guiding principle is that this should not jeopardise the continuity of business. The account balance is a snapshot. However, a bank must describe the procedures it has in place for the processing of in-flight transactions in the event that it does in fact fail.

Determining interest
A bank is required to be able to calculate "interest accrued but not yet credited" at any time until the day of bankruptcy. The amount of interest must be included as a separate field in the SCV file.
Any interest to which a customer has not yet become irrevocably entitled must be disregarded.

In the case of "bonus interest", the terms "accrued" and "credited" are important legal concepts. The product's terms and conditions must show clearly that interest will "accrue" during the year. The interest accrued until the day when the DGS is activated must be included in the SCV file if the product's terms and conditions clearly show that the product will accrue interest. Under the DGS legislation, DNB is not authorised to set off any negative balances, including negative interest. It is nevertheless important to inform depositors about negative amounts when DGS compensation is paid.

Particular attention should be devoted to determining the accrued interest on structured deposits[16]. The difference as compared to ordinary deposits is that the interest payable on structured deposits is not determined on the basis of an interest rate, but depends on external factors such as the market and indices.

The way in which interest is determined for this type of product is explained in greater detail in Section 3.6 of the Policy Rule on the Scope and Implementation of the Deposit Guarantee Scheme.

Division of the balance in the case of joint accounts
For every account with more than one depositor (for example a joint account), a *"pro rata"* division is applied in principle. In the absence of any other information, this is the guiding principle in a DGS payout situation.

In situations in which a different division has been contractually agreed in the bank's customer records, this can be stated in the "participation percentage" field, for example where there is an account with two depositors, one of whom is entitled to 25% of the deposit and the other to 75%.

Blocking of accounts
A situation may arise in which, although eligible for the DGS based on the guiding principles set out above, a deposit has been "blocked" and the depositor has no access to it. Blocked deposits **must** nonetheless be included in the SCV file[17]. The following deposits must be marked as having been blocked in the SCV file (see Section 6(1)(b) to (g) of the SCV Policy Rule for further details):

16 Structured deposits as referred to in Article 4(1)(43) of the 2014 "Markets in Financial Instruments" Directive.
17 If evidence is provided showing that an eligible but blocked deposit should no longer be blocked, payment can be made.

1. Deposits arising from transactions where there has been a criminal conviction for money laundering.
2. Deposits that are the subject of a legal dispute, as referred to in Article 8(5)(a) of the DGS Directive.
3. Deposits that are the subject of restrictive measures taken by national governments or international bodies (e.g. on the basis of a terrorism or sanctions list). The bank must assess new and existing customers according to the criteria set out in sanctions law (including Section 3 of the Dutch Regulation on Supervision pursuant to the Sanctions Act 1977 (*Regeling toezicht Sanctiewet 1977*) and the deposit must be marked accordingly in the bank's records and included in the SCV file where appropriate.
4. Deposits over which a pledge has been created and only the pledgee is authorised to collect payments.
5. Deposits that have been attached.
6. Deposits that have been blocked pursuant to the laws of the country where the deposit is held, to the extent that such blocking is relevant to a payout under the deposit guarantee scheme ("foreign blocking").

Any other blocking of accounts by banks is irrelevant for DGS purposes and the deposits in question must not be marked as blocked in the SCV file.

Deposits are blocked at account level. This means that if the account has multiple depositors, all depositors are denied access to the account.

The following blocking codes must be used:

Blocking	Code
■ Convicted of money laundering	BLOK-WITWASSEN
■ Legal dispute	BLOK-GESCHIL
■ Restrictive measures	BLOK-MAATREGEL
■ Attachment	BLOK-BESLAG
■ Pledged	BLOK-VERPAND
■ Foreign blocking	BLOK-BUITENLAND

Marking of cross-border services
In order to determine the payout approach, it must be clearly stated for each deposit whether cross-border services apply as part of the respective activity: *European passport outward - 2:110 Supply of bank services to EEA*. An important factor is whether deposits are solicited through a branch in another Member State or without the bank having a branch. The marking for cross-border services involves the use of the following fields.

Field	Notes
Country of branch of account	If the deposit is held at a branch of the bank in an EEA Member State, the country code of the respective Member State is entered here. In all other cases "NL" is entered, even for an account of a foreign depositor operated under a *"European passport outward – 2:110 Supply of bank services to EEA"* structure.
Country of Cross Border Services	Where a bank operates in another EEA Member State under the European passport for cross-border services, the country through which the deposit was solicited must be stated. A bank can select the following options for this field: ■ NVT (n/a, not cross-border) ■ Onbekend (unknown whether cross-border) ■ <country> (for cross-border services, limited to EEA Member States)

2.8 Technical specifications, submission and validation of the SCV file

The DDA provides extensive guidance on how to submit the SCV file and explains all the validation rules that the submission of the SCV file must meet.

2.8.1 Technical specifications for data structure and submission

The technical specifications of the data structure and submission are included in the DDA. The DDA consists of the following components.

Dealing with field lengths in the data model

The length of the data fields in the data model takes as much account as possible of the usual maximum size of these data in bank databases. Nevertheless, if the available field length in a specific case turns out to be insufficient for the data to be supplied, the data can be truncated at the maximum field length. Banks should contact DNB if this gives rise to a structural problem. The field length for a subsequent version of the DDA may be amended in consultation with banks.

Spaces should not be added to the data to fill the maximum field length, because that would greatly increase the size of the SCV file, with detrimental consequences for processing and speed of operations at DNB. Particularly during a DGS payout situation, this could jeopardise compliance with the payout deadline.

DDA

Document	Notes
DDA *Document*	**DGS Single Customer View Data Exchange - GLO_<date>_<version>.pdf** Technical management information concerning the Data Delivery Agreement. In addition to specifications, contains all references to/user guide for information/documents/files required for submission according the DDA. Also intended for data specialists.
Data model (technical)	**DNB_STAT_NDGS_SCV_GLO_<version>.ldm** File in native PowerDesigner format which banks can use to implement the requirements of the data model as a database. Intended for data specialists.
Data model (HTML)	**DNB_STAT_DGS_SCV_GLO_Report_for_Banks_<date>_<version>.zip** Version of the data model that can be opened in a web browser and is intended as a reference source for data specialists. Contains fields, diagrams, validations, entities, codes, relationships, data types, permitted values, etc.
Model constraints	**DNB_STAT_DGS_SCV_GLO_Report_for_Banks_<date>_<version>.zip** All "model constraints" summarised in a single document as a complete overview.
Reference data sets	**Reference_data_sets_<date>_<version>.xlsx** Excel sheet with each tab containing the permitted values for a specific field from the data model. See Section 4.2 of the DDA document for further information.
Reference metadata sets	**Reference_metadata_sets_<date>_<version>.xlsx** Excel sheet containing the values for the reference/enumeration tables. See Section 4.3 of the DDA document for further information.
Release notes	**Release Notes_<version>.xlsx** These keep a record of all changes in the DDA from version to version.

All of the above is published as a single complete set (**Datamodel_GLO <version>.zip**) on the DNB website.

2.8.2 Submission process and timelines

A data delivery will take place through Logius and has to be made specific for compliance with three different sets of requirements.

■ **Logius-specific.** In addition to DNB, Logius has specific requirements with regard to the composition of the files sent through its FTP connection. These are described in documentation available on the Logius website. Where the Logius documentation differs from DNB documentation, the DNB documentation is leading.

- **DNB-specific.** This is described in the document *Delivery of data to DNB using Logius Digipoort_<version>.pdf* available on the DNB website. This document supplements the Logius documentation. It states how the delivery must be made DNB-specific. It is a generic document intended for all types of data obligations towards DNB (AnaCredit, DGS, RRE, etc.)
- **DGS-specific.** Finally, the DDA *document* describes how the delivery is made DGS-specific.

The three documentation sets are complementary and must be used concurrently to ensure correct delivery.

A summary description of the process:
- DNB defines the specifications for submitting the SCV file (DDA, logical data model);
- DNB publishes these specifications, including a public encryption key, on its website;
- Banks use this information to operationalise the submission of the SCV file;
- DNB alerts banks in the form of a reporting obligation to submit an SCV file through DNB's Digital Reporting Portal (*Digitaal Loket Rapportages – DLR*);
- Banks have secure access to the DLR, which contains their reporting obligations, including the obligation to submit the SCV file;

- Banks submit the SCV file through Logius, encrypting both the transmission and the file itself;
- Logius receives the SCV file, runs a number of technical checks and sends confirmation of receipt to the bank. Logius then forwards the SCV file to DNB.
- DNB receives the SCV file, performs a number of technical and logical validations, updates the status of receipt in the DLR and publishes the outcome of the validations in the DLR.
- The bank's authorised staff receive confirmation in the DLR;
- Banks can view the validation outcomes and status in the DLR.
- DNB deletes the submitted SCV files within three months. The bank receives confirmation of this in the DLR.

SCV files must be submitted in the following two situations:
- During normal business operations: this involves the delivery of data for validation purposes to allow DNB to monitor and ensure data quality[18];
- In crisis situations: this involves the delivery of data by a failing bank if the DGS has been activated for the bank.

In both situations, a full data delivery is required. Partial filings or fictitious data are not permitted because that would prevent the SCV file from being checked for correctness, completeness and timeliness. The data delivery must comprise all data covered by the full extent of the banking licence, i.e. including any EEA-based branches. Banking groups with multiple banking licences must deliver the data per banking licence.

Timelines

Section 9 of the SCV Policy Rule specifies the timelines for banks to deliver the SCV data to DNB. To allow payouts to be made within seven working days, banks must deliver their SCV files to DNB within three working days. "Deliver within three working days" means a delivery that does not contain blocking validation results, so the status in the DLR is set to "Accepted".

A bank must supply the SCV data within three working days following the decision to activate the DGS or when DNB makes a specific request to that effect. See Chapter 5 for the process to be followed once the DGS has been activated.

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18 Many banks carry out a full SCV run for the quarterly report for the DGS/DGF. Any resulting SCV file does not have to be submitted to DNB. DNB will contact the bank if it requires the submission of an SCV file.

Figure 6 SCV file submission process

Banks

- Design & create data exchange
- Process control
- Submit data

DNB.nl

- DDA* including FLDM**
- Public key (encryption)

Download requirements

DNB Digital Reporting Portal   *E-authentication*

- Obligations
- Status of obligations & submissions
- Validation of results

Obligation available?

Status of submissions?

Logius   *PKI-o certificate*

- Receive
- Validate
- Submit

Submit data   *Transmission & file encryption*

Confirmation of submission (XML)

DNB

- Define data exchange requirements
- Create obligations
- Process validations and status update
- Validate
- Receive

Publish requirements

Publish obligations

Publish submission results

Confirmation of submission (XML)

Submit data   *Transmission & file encryption*

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* Data Delivery Agreement
** Formal Logisch Data Model

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Verification of data after submission
DNB will check whether the data delivered meets the technical and other requirements set out in the DDA (with the FLDM). If the delivery is invalid, the bank will be considered not to have met its delivery obligation. It will then be required to make a new delivery (see the extensive guidance in the DDA *document*).

2.8.3 Corrections
Because of the maximum seven working-day payout, it is essential that the delivered SCV data **arecorrect** and **complete**. In exceptional situations, a bank may discover, after delivering the SCV file to DNB, that corrections need to be made to the original batch, for instance because the bank has come across deposits or depositors that were left out of the original batch, because in-flight transactions were not (fully) processed or because the original batch contained incorrect data. A bank must immediately notify DNB of any required corrections.

The DDA describes how corrections are to be submitted.

A distinction is drawn between two situations:
- Corrections submitted **before** DNB opens the DGS portal to depositors; and
- Corrections submitted **after** DNB has opened the DGS portal to depositors (the DGS has been activated).

A further distinction is made in terms of the scale of the corrections:
- Minimal corrections;
- Substantial corrections.

DNB will determine whether the extent of the corrections is minimal or substantial and will inform the bank accordingly.

The circumstances of each specific case will determine how corrections are to be handled:

Figure 7 Handling corrections

Time of submission of adjustments

Size of adjustments	Before opening of web portal	After opening of web portal
Minimal	Handled manually	Handled manually
Substantial	Entirely new delivery, automated handling	Payout processes stopped Specific solution for each situation

Corrections requiring a new data batch submission
If DNB or the bank involved discovers that a substantial amount of data is missing from the original batch or is incorrect, and the DGS portal has not yet been opened, the bank, in consultation with DNB, must submit an entirely new data batch.

Corrections that can be processed manually
If a bank discovers that a minimal amount of data is missing from the original batch or is incorrect, this data may be entered or adjusted manually by DNB staff. The bank must consult with DNB on how to supply these corrections.

Substantial corrections after payouts have begun
If a bank discovers that a substantial amount of data is missing from the original batch or is incorrect, and the web portal has already been opened, the payout process will be discontinued immediately.

Corrections in response to complaint by beneficiary or (legal) representative
Apart from corrections of errors discovered by the bank, the situation may arise in which a beneficiary or (legal) representative detects an error. Obviously, these errors will not come to light until after the DGS portal has opened.

Such errors may include a beneficiary missing an account on their statement or a (legal) representative missing a beneficiary represented by them. If they contact DNB and duly submit the right documentary evidence, DNB will proceed to pay compensation.

3 DGS reports

3.1 Introduction

This chapter describes the different types of DGS reports, their format and the period and the manner in which banks are required to supply them. The DGS reports show at aggregate level the number of accounts, balances with interest accrued but not yet credited and the amount of a bank's covered deposits (deposit base).

The 2011 Regulation on Statements of Financial Undertakings under the *Wft* (Statements Regulation) sets out in more detail the banks' obligation to file quarterly data to enable calculation of the levies payable into the Deposit Guarantee Fund. The reporting forms (DGS reports) comprise both the current basis for the levy calculation and the SCV data for future levy calculation. Since 2016 banks have been filing quarterly reports stating the number of accounts and account balances to enable DNB to calculate the levies. Those reports will now be supplemented by the new reports including the list of covered deposits based on the SCVs.

Banks must be able to calculate the amount in covered deposits in euros for each depositor using the SCV system. In order to determine the deposit base, the parts of the deposits covered by the DGS must be aggregated subject to the maximum of EUR 100,000 per depositor. In determining its deposit base, a bank must consider the markings and guiding principles set out in the SCV Policy Rule (see Section 4(3) of the SCV Policy Rule). Accounts are included in the original currency in the SCV file, both for validation purposes and in an actual payout situation. A bank must also be able to perform the conversion into euros itself, for example in order to include the covered amount in the quarterly DGS reports for the purposes of forming the Deposit Guarantee Fund. The covered amount is always in euros. The conversion is based on the reference exchange rates for the euro on the reference date published by the ECB (ECB reference rates), or exchange rates published by exchange rate providers.

3.2 Overview of DGS reports

A distinction is drawn between three types of DGS reports:

DGS report	Notes	Filing frequency[19]	Filing method
Liabilities eligible for the DGS – individual	Quarterly DGS report stating the number of deposits, the account balances in euros, including interest accrued but not yet credited, and the total amount in covered deposits (deposit base) per bank holding a banking licence, at individual level (i.e. banking groups are broken down by banking licence);	Every calendar quarter	DLR
Liabilities eligible for the DGS – consolidated	Quarterly DGS report stating the number of deposits, the account balances in euros, including interest accrued but not yet credited, and the total amount in covered deposits (deposit base) at consolidated level;	Every calendar quarter	DLR
Appendix specifying accounts and amounts per EEA-based branch	Annual DGS report stating for each licensed bank the number of deposits and the account balances, including interest accrued but not yet credited, for each EEA-based branch.	Every calendar year	DLR

Appendix 9 provides extensive guidance on the structure of these reports, including full instructions on how to fill in the forms.

3.2.1 Structure of quarterly DGS reports
The quarterly reports (individual and consolidated) provide aggregate information on eligible deposits and the covered part of the deposits held at a Dutch bank including its EEA-based branches. During the amendment round in February 2019 tables A and B were amended to highlight any difference between the size of the reported deposits under FINREP and DGSD. The definition of these liabilities in FINREP differs from the definition of deposits in accordance with Article 2(3) of the European directive on deposit guarantee schemes (2014/49/EU, also known as DGSD). This can lead to a difference between the statement in FINREP and tables A and B. At DNB's request a bank can provide a quantitative explanation of this difference.

Notes on components of the quarterly report (see Figure 8):
A. Column 09 states the amount in covered deposits based on the bank's single customer views.
B. Line 100, column 06, is a calculated field, with the amount in covered deposits being estimated on the basis of the number of accounts and the account balances, which are included in lines 017 to 021 inclusive.

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19 DNB can also request these reports on an ad hoc basis, for example in connection with the transfer of all or part of the deposits to a DGS in a different EEA Member State as a result of a restructuring, merger or sale.

C. Line 008 must be used to specify bank savings deposits related to the purchase of a private residential property. These deposits are therefore not entered directly on line 002. This ensures that the report is consistent with the SCV file.

D. Lines 005 and 006 contain the number and balances of business and retail accounts eligible for the DGS. The report also requires banks to specify the number of accounts and the account balances for public authorities (line 003) and other financial undertakings (line 004). This ensures that the report is consistent with the SCV file.

E. In table A and B line 001 is moved to a new line 200. The associated footnote is renumbered (11). Line 001 becomes a new line, in which banks include the total amount in deposits held at the bank in accordance with the definition of deposits in the DGSD. Footnote 1 is amended accordingly.

The information in this report will serve as input to calculate the levies payable into the Deposit Guarantee Fund (see also Chapter 5). The amount in covered deposits will also be reported to the Single Resolution Board (SRB) to calculate the levies payable into the Single Resolution Fund (SRF).

3.2.2 Structure of DGS report for branches
The annual DGS report on the number of deposits and account balances held with branches has remained unchanged.

3.2.3 Review by external auditor
The requirement for a separate review of the reports by a bank's external auditor lapsed on 1 January 2019[20]. On that date the review became an integral part of the annual engagement to form an opinion on compliance with the requirements of the SCV Policy Rule during the year under review (see Section 12 of the SCV Policy Rule).

3.3   Submission deadline and method of submission

3.3.1 Indientermijn DGS-rapportages
The deadlines for submitting the quarterly DGS reports are the same as those for the regular FINREP reports, i.e. 11 February, 12 May, 11 August, and 11 November. Accordingly, banks must report on the deposits held by them as at 31 December by 11 February of the following year.

The deadline for submitting the annual DGS report is the same as for the quarterly DGS report as at 31 December. This reporting requirement only applies to banks with deposits held with an EEA-based branch. If the submission deadline falls on a Saturday, Sunday or public holiday, the report must be submitted to DNB on the next working day.

If a bank fails to submit the report on time, its deposit base will be estimated by DNB. This estimate will then serve as a basis for calculating the levies payable into the Deposit Guarantee Fund. Similarly, the DGS and resolution authority will use estimates of their own if reports are not received on time so as to calculate the levies payable into the resolution fund.

3.3.2 Method of submitting of DGS reports
The new DGS reports must be submitted through DNB's Digital Reporting Portal (*Digitaal Loket Rapportages*, DLR). The DLR Manual available on the DNB website explains how to submit the reports (https://www.dnb.nl/statistiek/digitaal-loket-rapportages/).

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20 Banks were required to instruct their external auditors to perform Agreed Upon Procedures regarding Financial Information (in accordance with the COS 4400 standard).

> **Comments:**
> DNB is currently developing an XBRL taxonomy for the DGS reports. This taxonomy replaces the container reporting in Excel. Banks will be informed in good time of the XBRL taxonomy and the time of introduction.

3.3.3 Transition to new DGS reporting formats

Banks must use the new reporting formats for the first time for the period ending on 31 September 2019. Until the law governing the use of the BSN is amended, the statement of the amount in covered deposits based on the SCV (column 09 of the quarterly DGS report) is optional. Completion of column 09 will then become mandatory and the calculation of the levy will be based on the entry in column 09.

3.4 Consistency between SCV file and DGS reports[21]

The single customer views in the SCV file form the basis for determining the amount in covered deposits per depositor. The quarterly DGS reports then state the total amount in the covered deposits. This is an aggregate statement of the number and balances of the covered part of deposits at an individual level. Section 4(3) of the SCV Policy Rule sets out how banks must deal with markings when calculating the amount in covered deposits.

Example: Figure 10 shows a simplified SCV file from a fictional bank, ABC Bank. Figure 11 shows ABC Bank's quarterly DGS report based on the simplified SCV file.

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21 Banks carry out a full SCV run for the quarterly report for the deposit guarantee scheme. Any resulting SCV file does not have to be submitted to DNB. DNB will contact the bank if it requires the submission of an SCV file.

Figure 8 Structure of quarterly DGS reports

A

Liabilities eligible for deposit guarantee scheme (DGS) – individual

		Number of accounts (in units) [8]			Amounts in thousands of euros					
		01	02	03	04	05	06	07	08	09
		Number of accounts at Dutch branches	Number of accounts at EEA branches	Total number of accounts	Through the Netherlands	Through EEA branches	Total through the Netherlands and EEA branches (04+05)	Foreign subsidiaries and non-EEA branches	Total (06+07)	Covered deposits as shown in bank's records [9]
001	Deposits (other than from credit institutions) [1]								V	
002	of which through the Netherlands and EEA branches, respectively [2]	V	V	B	V	V	B			V
	Creditors by legal status									
003	- Public authorities	V	V	B	V	V	B			V
004	- Other financial undertakings [3]	V	V	B	V	V	B			V
005	- Corporate clients other than financial undertakings	V	V	B	V	V	B			V
006	- Retail customers	V	V	B	V	V	B			V
007	Total of lines 003 to 006 (equal to line 001 column 08)	B	B	B	B	B	B		V	B
008	of which bank savings deposits for private residential property [4]	V	V	B	V	V	B			
010	Total eligible for DGS as shown in this statement (005+006-008)	B	B	B	B	B	B			
	Total eligible for DGS by account balance (010) and type of account [5]									
017	of which ≤ EUR 100,000	V	V	B	V	V	B			
018	EUR 100,000 - EUR 200,000 (accounts with one beneficiary)	V	V	B	V	V	B			
019	EUR 100,000 - EUR 200,000 (joint accounts and other accounts) [6]	V	V	B	V	V	B			
020	≥ EUR 200,000 (accounts with one beneficiary)	V	V	B	V	V	B			
021	≥ EUR 200,000 (joint accounts and other accounts)	V	V	B	V	V	B			
022	Total of lines 017 up to and including 021 [7]	B	B	B	B	B	B			
100	Total amount in covered deposits based on number of deposits and account balances [10]						B			
200	Deposits (other than from credit institutions) according to FINREP [11]								V	

Figure 9 Liabilities eligible for DGS – EEA branches

C

Liabilities eligible for deposit guarantee scheme (DGS)

		Number of accounts (in units) [2]					Amounts in thousands of euros				
		01	02	03	04	05	06	07	08	09	10
		Number of accounts at EEA branch in country A Name of country Name of branch	Number of accounts at EEA branch in country B Name of country Name of branch	Number of accounts at EEA branch in country C Name of country Name of branch	Number of accounts at EEA branch in country Z Name of country Name of branch	Total number of accounts at EEA branches	EEA branch in country A	EEA branch in country B	EEA branch in country C	EEA branch in country Z	Total at EEA branches
	Creditors by legal status										
005	- Corporate clients other than financial undertakings	V	V	V	V	B	V	V	V	V	B
006	- Retail customers	V	V	V	V	B	V	V	V	V	B
007	Total eligible for DGS as shown in this statement (005+006)	B	B	B	B	B	B	B	B	B	B

	By account balance and type of account										
017	of which ≤ EUR 100,000	V	V	V	V	B	V	V	V	V	B
018	EUR 100,000 - EUR 200,000 (accounts with one beneficiary)	V	V	V	V	B	V	V	V	V	B
019	EUR 100,000 - EUR 200,000 (joint accounts and other accounts) [5]	V	V	V	V	B	V	V	V	V	B
020	≥ EUR 200,000 (accounts with one beneficiary)	V	V	V	V	B	V	V	V	V	B
021	≥ EUR 200,000 (joint accounts and other accounts)	V	V	V	V	B	V	V	V	V	B
022	Total of lines 017 up to and including 021 [1]	B	B	B	B	B	B	B	B	B	B

Figure 10 Simplified SCV file – ABC Bank

	Data in SCV file											Derived from data in SCV file			
SCV ID	Depositor	Country/ Branch	Customer uniquely identified	Type of depositor	Customer is eligible	Customer deceased	Product (deposit)	Product category	Product is eligible	Blocked account	Balance (including interest)	Covered amount according to quarterly report	Automatic processing of DGS payout	Manual processing of DGS payout	Note
01	Customer 1	NL	Yes	Public authority	No	N/A	Account 1 Account 2	Current account Savings account	N/A N/A		200,000 30,000 230,000	0	0	0	Government bodies are not eligible for DGS.
02	Customer 2	NL	Yes	Public authority	No	N/A	Account 3	Current account	N/A		45,000	0	0	0	Government bodies are not eligible for DGS.
03	Customer 3	NL	Yes	Financial undertaking	No	N/A	Account 4 Account 5	Current account Fixed-term deposit	N/A N/A		400,000 35,000 435,000	0	0	0	Financial undertakings are not eligible for DGS.
04	Customer 4	NL	Yes	Financial undertaking	No	N/A	Account 6 Account 7 Account 8	Current account Savings account Fixed-term deposit	N/A N/A N/A		10,000 240,000 20,000 270,000	0	0	0	Financial undertakings are not eligible for DGS.
05	Customer 5	NL	Yes	Corporate client	Yes	N/A	Account 9 Account 10	Current account Current account	Yes Yes		30,000 40,000 70,000	70,000	70,000	0	
06	Customer 6	NL	Yes	Corporate client	Doubt	N/A	Account 11 Account 12	Current account Fixed-term deposit	Yes Yes		20,000 300,000 320,000	100,000	0	100,000	Doubt whether customer is eligible, but amount to be included in quarterly report.
07	Customer 7	NL	Yes	Corporate client	Yes	N/A	Account 13	Escrow account	Yes		140,000	140,000	0	140,000	Escrow account to be shown fully in quarterly report.
08	Customer 8	DU	Yes	Corporate client	Yes	N/A	Account 14 Account 15 Account 16	Current account Savings account Savings account	Yes Yes Yes		30,000 1,000 15,000 46,000	46,000	46,000	0	Customer through EEA branch (DU).
09	Customer 9	NL	No	Retail customer	Yes	No	Account 17	Current account	Yes		10,000	10,000	0	10,000	Doubt about unique identification, but amount to be included in quarterly report.

#	Customer						Accounts	Account type			Amount				Comments
10	Customer 10	NL	Yes	Retail customer	Yes	No	Account 18 Account 19 Account 20	Current account Savings account Other tax-efficient accounts	Yes Yes Doubt		−500 2,000 10,000 11,500	12,000	2,000	10,000	Overdraft is a debt and not set off against DGS payout. Doubt whether deposit is eligible, but amount to be included in quarterly report.
11	Customer 11	NL	Yes	Retail customer	Yes	No	Account 21 Account 22 Account 23	Current account Savings account Other tax-efficient accounts	Yes Yes Yes		10,000 20,000 300 30,300	30,300	30,300	0	Correct SCV, no special comments.
12	Customer 12	NL	Yes	Retail customer	Yes	No	Account 24 Account 25 Account 26	Current account Current account Savings account	Yes Yes Yes	Yes	30,000 3,000 15,000 48,000	48,000	18,000	30,000	Blocked account to be included in quarterly report.
13	Customer 13	BE	Yes	Retail customer	Yes	Yes	Account 27 Account 28	Savings account Savings account	Yes Yes		5,000 300 5,300	5,300	5,300	0	Correct SCV, customer is deceased, but amount to be included in quarterly report. Customer of EEA branch (BE).
14	Customer 14	NL	Yes	Retail customer	Yes	No	Account 29 Account 30	Savings account Bank savings deposit private residential property	Yes No		5,000 150,000 155,000	5,000	5,000	0	Account 30 is a bank savings deposit for a private residential property.
Total amount											**1,816,100**	**466,600**	**176,600**	**290,000**	

Figure 11 Liabilities eligible for deposit guarantee scheme – ABC Bank

	Liabilities eligible for deposit guarantee scheme (DGS)	Number of accounts (in units) [8]			Amounts in thousands of euros					
		01	02	03	04	05	06	07	08	09
		Number of accounts at Dutch branches	Number of accounts at EEA branches	Total number of accounts	Through the Netherlands	Through EEA branches	Total through the Netherlands and EEA branches (04+05)	Foreign subsidiaries and non-EEA branches	Total (06+07)	Covered deposits as shown in bank's records [9]
001	Deposits (other than from credit institutions) [1]								1,816,100	
002	of which through Dutch branches and EEA branches, respectively [2]	25	5	30	1,764,800	51,300	1,816,100			
	Creditors by legal status									
003	- Public authorities	3	0	3	275,000	0	275,000			
004	- Other financial undertakings [3]	5	0	5	705,000	0	705,000			
005	- Corporate clients other than financial undertakings	5	3	8	530,000	46,000	576,000			356,000
006	- Retail customers	12	2	14	254,800	5,300	260,100			110,600
007	Total of lines 003 to 006	25	5	30	1,764,800	51,300	1,816,100			466,600
008	of which bank savings deposits for private residential property [4]	1	0	1	150,000	0	150,000			
010	Total eligible for DGS as shown in this statement (005+006-008)	16	5	21	634,800	51,300	686,100			
	Total eligible for DGS by account balance (010) and type of account [5]									
017	of which ≤ EUR 100,000	14	5	19	194,800	51,300	246,100			
018	EUR 100,000 - EUR 200,000 (accounts with one beneficiary)	0	0	0	0	0	0			
019	EUR 100,000 - EUR 200,000 (joint accounts and other accounts) [6]	0	0	0	0	0	0			
020	≥ EUR 200,000 (accounts with one beneficiary)	2	0	2	440,000	0	440,000			
021	≥ EUR 200,000 (joint accounts and other accounts)	0	0	0	0	0	0			
022	Total of lines 017 to 021 [7]	16	5	21	634,800	51,300	686,100			
100	Total amount in covered deposits based on number of deposits and account balances [10]						446,100			
200	Deposits (other than from credit institutions) according to FINREP [11]								1,816,100	

Notes to worked example relating to ABC Bank

This example uses a fictional bank, ABC Bank, to explain how banks must deal with markings when producing a quarterly report.

In the example, ABC Bank has 14 customers and 30 accounts. Most of its customers have multiple accounts, as shown in the (simplified) SCV. These customers and their products have different characteristics, as reflected by the markings which the bank is required to apply under the SCV Policy Rule. In the simplified SCV the interest accrued but not yet credited is included in the balances. In a standard SCV the interest amount is shown separately. The balances in the quarterly DGS report include this interest.

On the basis of these markings, the bank determines the covered amount per depositor according to the various rules governing the calculation of its deposit base (from which the quarterly levies are derived) and the amounts of compensation to be paid, whether or not automatically.

The example shows how the markings are to be used in the different reports.

Consistency between SCV file and quarterly DGS reports

Guiding principles:

- The bank must create the SCV file using an SCV system. The bank must ensure that the SCV system is connected to its source systems (see Chapter 5 of the SCV Policy Rule).
- The SCV file must contain all SCVs, including those of depositors ineligible for the DGS (see Section 2 of the SCV Policy Rule). The SCV file must contain the required data for all of the bank's depositors, i.e. their deposits (accounts), the account balances and the interest accrued but not yet credited as at the reference date (Section 29.06(2) of the *Bbpm*).
- The SCV file must contain the markings required for each SCV. These are important for processing in the quarterly reports and in an actual payout situation.
- The SCV file must also specify the country where the deposits are held (if they are held at a branch in an EEA Member State).

The following rules apply to the determination of the numbers and balances of the eligible and covered deposits in the quarterly reports:

- The balances shown in the quarterly reports include the interest accrued but not yet credited on the reference date.
- A bank can use exchange rates published by the ECB or exchange rate providers in order to calculate the eligible and covered amounts.

- Deposits held by depositors (customers) whose identities cannot be established with a high degree of reliability **must** be included.
- Deposits held by depositors (customers) whose eligibility for the DGS is doubtful **must** be included;
- Deposits held by deceased depositors (customers) **must** be included.
- Deposits (products) whose eligibility for the DGS is doubtful **must** be included.
- Deposits with the following markings (blockings) **must** be included:
  - deposits arising from transactions where there has been a criminal conviction for money laundering, as referred to in Section 29.01(2) of the *Bbpm*;
  - deposits that are the subject of a legal dispute, as referred to in Article 8(5)(a) of the DGS Directive;
  - deposits that are subject to restrictive measures imposed by national governments or international bodies, as referred to in Article 8(5)(b) of the DGS Directive;
  - deposits over which a pledge has been created for a third party or which have been attached;
  - deposits that are blocked pursuant to the laws of the country where the deposit is held, to the extent that the blocking is relevant to a DGS pay-out.

- The full account balance must be included for deposits held on behalf of third-party beneficiaries under a contract or pursuant to a statutory requirement (escrow accounts), unless the bank can perform an accurate calculation in accordance with Section 4(3)(e) of the Single Customer View Policy Rule. The alternatives are:
  - The number of third parties multiplied by the maximum covered amount
  - The sum of the covered amounts of each third party individually, taking into account the maximum guaranteed amount per depositor per banking licence, with no requirement for the bank to take into account other deposits that the third party holds at the bank.
  - Processing the covered amount of each third party individually, taking into account the maximum covered amount.

  A bank must be able to show which method has been used to calculate the amount of each escrow account.
- Bank savings deposits for a private residential property, as referred to in Section 29.01(2)(e) of the *Bbpm*, **must not** be included.

If a deposit has any of these markings, the SCV must be processed manually in the event of an actual payout.

4 Data quality assurance

4.1 Introduction

This chapter provides guidance on the controls that a bank must have in place to ensure data quality. The supervision exercised by DNB focuses on the correctness and completeness of the data submitted and on how procedures and controls are managed.

4.2 Controls in place at a bank

The importance of an effective SCV system
The SCV system is a set of procedures and measures with which the bank, in a manner and within a time period to be determined by DNB, can:
- compile the SCV file (see Chapter 2 for guidance on the SCV file);
- calculate the eligible and covered amounts, including the deposit base that the bank needs to specify in the quarterly DGS reports (see Chapter 3 for guidance on the DGS reports);
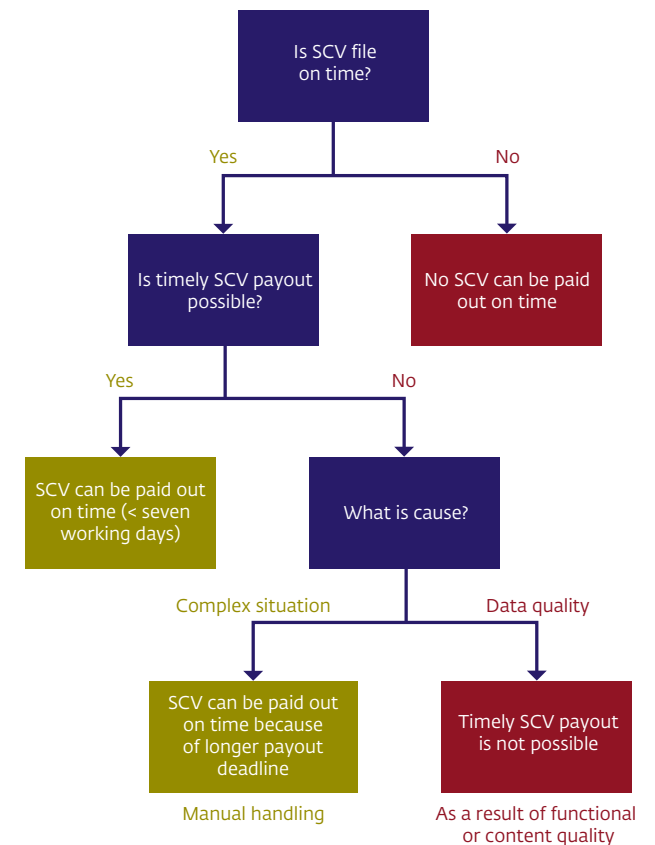- undertake any action for resolution purposes.

Section 10(1) of the SCV Policy Rule stipulates that banks must have procedures and controls in place that ensure the correctness and completeness of the data needed to create single customer views. High standards are set in this regard.

If the data quality is insufficient, it will not be possible to pay out compensation to depositors on time. Poor data quality may not be the only reason preventing DNB from paying out compensation to a depositor on time (see Chapter 5 for an explanation of the DNB process). Other reasons could be complex situations, such as escrow accounts, blocked accounts or a missing BSN. Figure 12 is a schematic representation of the requirements for a timely payout.

It is important that the largest possible number of deposits can be paid out within seven working days. A depositor can be paid within seven working days if:
- the identity of the beneficiary is clear (SCV reliability)
- there is no doubt about the eligibility for DGS
- the amount of the compensation can be determined
- there are natural persons who are able and authorised to apply for the compensation (depositor or representative(s))
- notification is possible (correct and complete address details)

Figure 12 Schematic representation of timely payout to depositors

Is SCV file on time?
- Yes → Is timely SCV payout possible?
  - Yes → SCV can be paid out on time (< seven working days)
  - No → What is cause?
    - Complex situation → SCV can be paid out on time because of longer payout deadline — Manual handling
    - Data quality → Timely SCV payout is not possible — As a result of functional or content quality
- No → No SCV can be paid out on time

SCV system guarantees data quality throughout the chain

The bank is responsible for the quality of the data to be delivered. The SCV Policy Rule places demands on the correctness and completeness of the data stored in the bank's primary record-keeping systems (source systems) and the processing of that data in the SCV file and DGS reports.

In DNB's opinion, the correctness and completeness of the data included in the SCV file and DGS reports can only be ensured if the bank operates effectively throughout the chain. The bank is responsible for having in place procedures and controls that ensure data quality in every link in the chain.

The chain starts with the way in which data are entered in the bank's product and customer systems. To achieve a high degree of reliability of the markings and data included in the SCV file, these markings and data must be entered directly in the bank's product and customer systems as far as possible. The bank's customer acceptance and Know-Your-Customer (KYC) processes must also apply the DGS definitions and markings to deposits and depositors. The bank's SCV system will then ensure that the data necessary to compile the SCV file and DGS reports is retrieved and combined within the deadline for submission. The situation may arise where not all of the markings for the SCV file were entered directly in the bank's product and customer records. An example is the marking that is used to indicate the SCV's reliability, which can be derived from the underlying data when creating the SCV. In that case, the bank will need to demonstrate that those markings were derived uniformly from the data stored in the product and customer systems.

Importance of unique identification of depositors

The bank is responsible for the unique identification of depositors who can be regarded as the beneficiaries of the deposits specified in the SCV. If it is unable to establish a depositor's identity with certainty, the bank must mark that particular SCV in the SCV file as doubtful. Because further identification will then be necessary, the SCV and payout will not be processed automatically by DNB (manual handling).

Reliable SCVs are crucial to the ability to pay compensation to depositors in a timely fashion. In order to ensure that reliability, a bank will need to establish the depositor's identity with sufficient certainty, using a combination of data. For example: Citizen Service Number (BSN) + Birthname + Date of birth. See Appendix 6 for permitted combinations of data. If details are missing from a combination of identifying data or are incorrect or have been combined incorrectly, the record-keeping system lacks sufficient data quality. In order for an SCV to be reliable, it is essential that the identifying details are entered in the bank's customer records properly. The identification of customers must be consistent with the bank's existing processes (such as its customer acceptance and Know-Your-Customer processes) and must meet the minimum quality requirements for DGS purposes.

Importance of reliable markings of eligible deposits

In addition to establishing the unique identity of depositors, the bank is responsible for[22]:
- reliably marking the bank's depositors that are eligible for the DGS;
- reliably marking the deposits that are eligible for the DGS (already a customer information requirement).

These markings are also important in order to ensure timely processing and payout of depositors' account balances.

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22 Pursuant to Article 5(4) of the DGSD and Section 6(1)(a) of the SCV Policy Rule.

Consistency between data in SCV file and regulatory reports

Section 10(3) of the SCV Policy Rule stipulates that a bank must ensure that all the information it provides for DGS purposes is consistent with the information filed for regulatory purposes (FINREP). This is to ensure consistent and robust data delivery. These reports do not have to be consistent in all respects because the amounts reported are aggregations and each have their own definitions. However, the data must be compiled consistently and from the same sources, although there will of course be timing differences between the reports. What is important is that the process is consistent and reliable and can be traced back to the same source data. A bank has to be able to explain any differences on a quantified basis (see also Chapter 3).

Controls

Section 11 of the SCV Policy Rule requires banks to have controls in place that meet the requirements set out in the policy rule. Banks should view the described controls as guidelines and assess independently whether additional controls are required.

Banks must have procedures in place that make compliance with SCV requirements part of the regular conduct of business. These may, for example, include operating procedures that ensure that all business units involved adhere strictly to the procedures and controls and that any inaccuracies or exceptions are identified and resolved quickly and in a timely fashion. These requirements are designed to achieve a multi-level control mechanism, with the strictest controls being embedded in the normal conduct of business so as to ensure high data reliability. The control of the bank's normal business processes (accounting system) can then focus on avoiding errors ("zero tolerance of errors"). The role of the internal audit department, as part of the bank's "three-lines-of-defence" model, must be defined in such a way as to allow the internal auditors to monitor compliance with the requirements set out in the policy rule. Taking the policy rule requirements as a basis, the internal audit department's activities should focus on monitoring the reliability of the controls embedded in the normal conduct of business.

The bank must also document its procedures and controls. This will create not only an internal reference framework but also a basis for the internal audit department's activities. These documents, containing full details of the controls embedded in the normal business processes and the internal audit department's procedures, must be available in a timely fashion in connection with the instructions to be given to the external auditor (see Section 4.3, Supervision).

Documenting the way in which the SCV file or the data included in the DGS reports have been generated will enable the internal audit department to form an opinion on how the procedures and controls are actually being applied in practice.

As part of its audit programme, the internal audit department must test at least once a year whether the requirements set out in the policy rule have been met. The internal audit department's report must be available within a reasonable time so as to be able to coordinate procedures with the external auditor, including defining materiality. The scope of those procedures is delineated by the provisions set out in the policy rule. The procedures must be sufficiently detailed to allow monitoring of the controls put in place to avoid errors.

4.3 Supervision

Supervision by DNB will focus on the correctness and completeness of the SCV files and DGS reports submitted by a bank, and on the effectiveness of the procedures and controls the bank has put in place to meet the requirements set out in the SCV Policy Rule.

Supervision is based on two pillars:
- **Periodic assessment** of the submission and quality of a bank's SCV file by DNB.
- **Annual assessment** of the SCV system by a bank's internal and external auditor, possibly supplemented with on-site examinations by DNB

Figure 13 Assessment framework for SCV requirements

	SCV file	SCV system
Timeliness	SCV file < 3 business days 0 1 2 3 No technical block	Audit reports < reporting deadline
Quality	Number and % of correct SCVs	Quality control process
	Request and assess SCV file	Examination by internal and external auditor
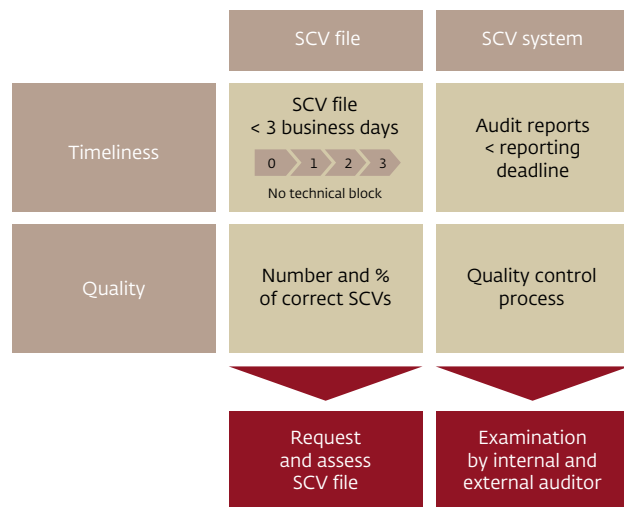
Assessment of the SCV system by the internal and external auditor

To supplement the assessment of the SCV system by the bank's internal auditor (see Section 4.2), a bank must instruct its external auditor at least once a year to assess the SCV system so as to give reasonable assurance that the requirements set out in the SCV Policy Rule (the standards framework) have been met. The annual engagement of the external auditor is important for a variety of reasons, including the need to ensure data quality, and is consistent with

his role in the event of a bank failure. The auditor must focus primarily on assessing the reliability of the procedures and controls. From the 2018 reporting year, the external auditor will no longer be required to produce a separate findings report on the DGS reports because the correctness and completeness of the data in those reports will then be clear from the internal management and control of the SCV system.

The audit engagements are based on ISAE 3402. Although designed for audits of service organisations, this standard is also suitable for applying to a bank's SCV system. When the audit instructions are issued, ISAE 3402 can be tailored to assessing the design, existence and effectiveness of the controls in place for the bank's SCV system for a particular reporting period (type 2 reporting). The controls tested under ISAE 3402 will in principle be those referred to in the SCV Policy Rule. The scope and depth of the audit engagement may be discussed annually by the bank, its external auditor and DNB. On that occasion, information may be supplied to the external auditor to enable him to define the required depth of the engagement. The external auditor must also acquaint himself with the procedures performed by the internal audit department and be given its reports so as to determine his own procedures. The procedures performed by the internal audit department are regarded as part of the bank's controls (see Section 4.2). The external auditor must test the entire set of controls

in order to form an opinion on the risks that could occur if the requirements set out in the policy rule are not met. Consultations have taken place between DNB, bank representatives (through the NVB) and the PwC, KPMG, EY and Deloitte accounting firms in order to clarify the depth and scope of the external auditor's engagement. This has resulted in a list of points which, as a minimum, will be part of the external auditor's engagement and are expected to be covered in the external auditor's ISAE 3402 report. See Appendix 10 for details of the minimum set of control objectives and controls.

Within the provisions of the Policy Rule each bank must determine for itself which controls should be described in the ISAE 3402 report, depending on the specific processes and systems used. To this end the bank will conduct a risk analysis, taking into account the size and complexity of the customer portfolio. On this basis the bank will ascertain the nature, scope and depth of the controls required in order to achieve the control objectives in the framework. The external auditor will also conduct a risk analysis on the basis of his work and form an opinion on the adequacy of the controls described.

The assumed minimum controls in place include controls which are not directly related to the creation of the SCV file but may be relevant to it. Specifically these are the regular customer acceptance and registration procedures, regular data quality checks,

reconciliation and period-end checks of nostro accounts and after-date movements in customer master data, including the related IT general controls (or generic IT internal controls). On the basis of its risk analysis the bank may conclude that these controls are not necessary in order to achieve the audit objectives and hence do not have to be described as part of a detailed audit. In that case the following conditions must be met:

1. The internal audit department conducts an annual audit of these processes and reports on it in an assurance report.
2. These reports and the procedures relating to the other controls in the ISAE 3402 report give no cause to doubt the internal control relating to these processes.

The bank states why it considers that the detailed checks of the above controls do not need to be included in the ISAE 3402 report. These controls must nevertheless still be conducted and compliance with this requirement will be monitored in the report of the internal audit department. The external auditor must at least acquaint himself with the internal auditor's procedures, findings and reports and will cover the main points of these in the ISAE 3402 report. If the auditor considers that the absence of one or more of these controls renders them inadequate for the audit objectives, he must make this known by qualifying the opinion in his assurance report.

At DNB's request, the bank will instruct the external auditor to perform an interim review.

Submission of internal and external auditors' reports
The SCV Policy Rule specifies that the report of the internal audit department must be made available to DNB as soon as possible but no later than five months after the close of the reporting year. The external auditor's ISAE 3402 report and assurance statement must be disclosed to DNB within five months of the close of the reporting year.

For practical reasons, the internal and external auditors' reports and the ISAE 3402 report must be submitted simultaneously. A reporting obligation has been included for this purpose in the Digital Reporting Portal (DLR).

Supervision by DNB: periodic assessment of the SCV file and assessment of the SCV system
DNB will periodically assess the quality of the SCV file, including its timely submission. It will also form an opinion on a bank's SCV system. Where appropriate, DNB may investigate the quality of the SCV system at the bank's offices.

A. In order to assess the quality of the SCV file, DNB may ask for information to be provided at any time. In order to approximate the actual payout situation as closely as possible and to allow DNB to assess the depth, detail and suitability of the SCV file, the SCV file must contain all single customer views. The data batch contains the bank's full, up-to-date production data[23]. A random check or an anonymised SCV file will not suffice. These single customer views must be submitted even if part of the data in single customer views is unavailable (for example if representation information is missing). Only then will DNB be able to gauge the completeness and accuracy of the SCV file. All this is necessary in order to receive a good-quality SCV file in the event that the DGS is actually activated.

The SCV files contain personal information on the bank's customers. It is important to handle and process the information with the utmost care. DNB has procedures and controls in place that ensure that this information is handled carefully and destroyed after the assessment stage. These procedures and controls are described in the Data Delivery Agreement for the submission of SCV files and meet the requirements in the Dutch Data Protection Act and provisions relating to data breaches.

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23 Guidelines on stress tests of deposit guarantee schemes under Directive 2014/49/EU.

DNB has defined validation rules for the assessment (see DDA). The SCV assessment findings will be made available through the generic data delivery process. DNB also develops metrics to help improve the quality of the SCV files. These will be fed back to banks.

Frequency and nature of assessment of SCV file:
As a rule, DNB will ask banks to provide an SCV file annually, unless it has grounds for increasing this frequency. Initially, the emphasis will be on quality improvement (see Chapter 6). The deadline for submitting the SCV file will be communicated to banks in advance, taking into account their other reporting obligations wherever possible. Eventually, the timely submission of the files will also form part of the assessment and banks may be asked to submit an SCV file without prior notice.

B. To assess the controls in place for the SCV system, DNB uses the reports prepared by the bank's internal audit department and its external auditor.

C. If it considers it necessary, DNB may conduct an on-site inspection of the bank's SCV system.

Information on material changes to the SCV system
A bank must inform DNB of any intention to introduce material changes to its SCV system and must notify DNB no later than three months after such changes have been implemented. This is to allow DNB to consider them when assessing the correctness and completeness of the data submitted by the bank. Examples of material changes to the SCV system include the integration with another bank through a merger or an acquisition or the transfer of a deposit portfolio, or the introduction of a new IT system to be used in connection with the SCV system.

The bank's management must give DNB advance notice of the material changes and issue a statement after the changes have been put in place.

Controls and enforcement
If the assessment provides grounds to do so, DNB may ask the bank to implement additional controls and take enforcement action[24]. DNB will impose additional measures if the SCV file is of poor quality in terms of being correct and complete, or if control of the SCV system is insufficiently ensured. In such cases, DNB will highlight the weaknesses found and specify the measures to be taken by the bank and the deadline for implementing them.

If a bank fails to meet the requirements set out in the DGS legislation, this Manual or the DDA, it will have to draw up a plan of action to address any deficiencies identified.

Supervision of new banks and mergers and acquisitions
A bank must provide DNB with an SCV file within six months of joining the DGS or being involved in a merger or an acquisition. The internal audit department's audit procedures must begin in the first reporting year. The external auditor's first report must follow within five months of the close of the first reporting year. Because the bank (or newly formed bank) will only just have started, the first audit engagement may be based on ISAE 3402 type 1. This means that only the design and existence of controls will be assessed. The audit engagement will be extended to include an assessment of their effectiveness (type 2) a year later.

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24 The basis for such action is the requirement that a bank must design its operations in such a way as to ensure the sound and ethical conduct of business (Section 3:17 of the *Wft*) and, in particular, to control its operational processes and operational risks. Section 26a of the *Bpr* provides further rules in this regard for DGS purposes.

5 Use of DGS data by DNB

5.1 Introduction

This chapter explains the different ways in which DNB will use the deposit data for DGS and resolution purposes. The emphasis is on the processes of DNB. The aim is to provide banks with an insight into these processes. A distinction is drawn between DNB's administration of the DGS, DNB's resolution task and the funding of both tasks.

DNB will use the deposit data included in the SCV files and DGS reports to:
- pay depositors under the DGS in the event of a bank failure;
- select and apply resolution tools;
- calculate the target size of and periodic levies payable into the various funds (DGF, NRF, SRF).

These uses are explained in more detail in the next sections.

5.2 DGS payout in the event of a bank failure

This section provides a general outline of DNB's role in the DGS payout process, starting from when a bank submits the SCV file.

5.2.1 Description of the DGS payout process

The payout process for Dutch bank depositors (no deposits at EEA branches)
The payout process for depositors of a Dutch bank who do not hold deposits at a branch in another Member State comprises the following steps (see Figure 14):
1. If a bank becomes insolvent, it must submit the SCV file to DNB.
2. DNB receives and validates this file.
3. DNB determines the compensation according to the system described in Section 5.3 and makes the compensation available via the web portal.
4. The depositor or his representative logs into the web portal using a DigiD[25] and enters the account number to which the compensation is to be paid. DNB prepares a decision letter in PDF format with information on the amount of the payout and the way in which it has been calculated.
5. DNB pays the amount to the account number supplied.

Figure 14 DGS payout process including Home-Host

1. Bank submits SCV file → 2. DNB validates file → 3. DNB determines compensation → 4. NL depositor provides counter account → 5. DGS pays compensation

6. DNB sends file to Host DGS → 7. DNB/DGF transfers money to Host DGS → 8. Host DGS pays depositors

Process for depositors of EEA branches

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25 DNB is working to increase the login possibilities for persons who do not have a DigiD, for example because they do not have a BSN.

Figure 15 Visual representation of the home-host payout process

Bank

DGS

Customers (host depositors) in country A

Branch of Bank X in Country A

Data

Head office Bank X in Netherlands

SCV file

Home DGS in Netherlands (DNB)

PIF

Host DGS in Country A

Customers (host depositors) in country A

Customers (host depositors) in country B

Branch of Bank X in Country B

Data

PIF

Host DGS in Country B

Customers (host depositors) in country B
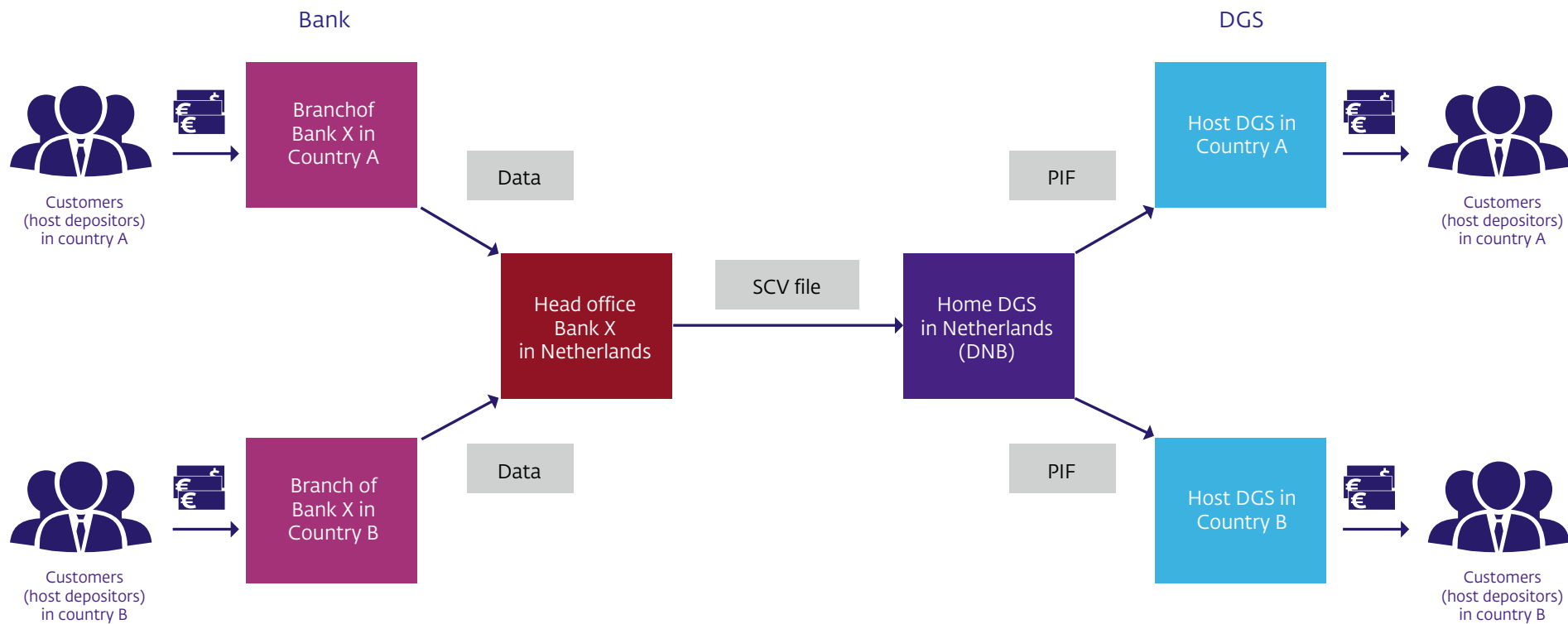
Banks are required to provide an SCV file periodically during business-as-usual in order for DNB to assess whether the bank is able to supply full and accurate data for DGS payout purposes in a timely fashion. In such cases, steps 1 and 2 are used to assess the quality of the data delivered by the banks. DNB will request an SCV file at least annually, but may do so more frequently if the situation so requires, for example in the event of data quality problems or if a bank appears to be getting into difficulty.

Payout process for foreign depositors at a Dutch bank (based on a passport for outward services)
The payout process for depositors who hold deposits on the basis of a *European passport outward - 2:110 Supply of bank services to the EEA* is similar to the procedure described in the previous section. The main difference is that many of these depositors do not have a BSN, so they cannot (yet) apply for their compensation through the web portal. DNB requires a counter account for the payout of the compensation. This is requested and processed manually (Step 4 in Figure 14; see also Section 5.2.3). Since the deposits are not held through a branch, the payout is made by DNB.

The European directive (Article 8(7)) states that communication with this group of depositors must take place in the language specified by the depositor when opening the account. In order to meet this requirement, DNB amended Section 2 of the Single Customer View Policy Rule in February h2019 (Section 2(4)(o)). This led to a number of fields being added to the SCV file data model: a field in which a bank states whether a deposit is held under a passport for cross-border services, and if so the country and the language involved. If this is not recorded in the bank's records, the bank should enter the language in which it communicates with these customers in practice.

Payout process for depositors of a Dutch bank's EEA-based branch
In Europe it has been agreed that the DGS in the Member State in which the branch is established will handle the payout and communication with depositors of the branch in that country (Article 14 of the DGS directive). The reasons for this are as follows:
- "Host depositors" are more familiar with the DGS in their own country (the "Host DGS");
- payouts are made in different ways in the various Member States (e.g. by cheque or through an Agent Bank);
- due to the language.

Host depositors cannot therefore use the web portal that DNB provides for Dutch depositors.
The payout process for depositors of EEA-based branches of a Dutch bank (host depositors) contains the following steps after Steps 1 to 3 of Figure 14:

6. After DNB has determined the compensation for depositors on the basis of the data supplied by the bank (the SCV file), the DGS through which the payout will take place is determined for each depositor. For each EEA Member State in which the bank has branches (host DGS), a payout file (payment instruction file, PIF) is created and sent.
7. DNB transfers the money for the payout to the host DGS(s).
8. The host DGS(s) pay(s) the money to the host depositors.

Banks do not have to perform any additional actions for payouts to host depositors as compared to a payout to Dutch depositors, because the data on host depositors has been included in the SCV file. DNB generates the PIF files for host DGS(s) on the basis of the data in the SCV file. The PIF file contains the name and address of each depositor, the amount payable and, if necessary, the account number to which the amount must be transferred. The PIF file is the instruction for the host DGS to pay compensation to the host depositors. The payout decisions are taken by DNB and the payout is made by the host DGS under the responsibility of DNB.

Figure 16 shows a timeline with the main milestones of a DGS payout.

Figure 16 Timeline from DGS activation to publication of payout information on web portal
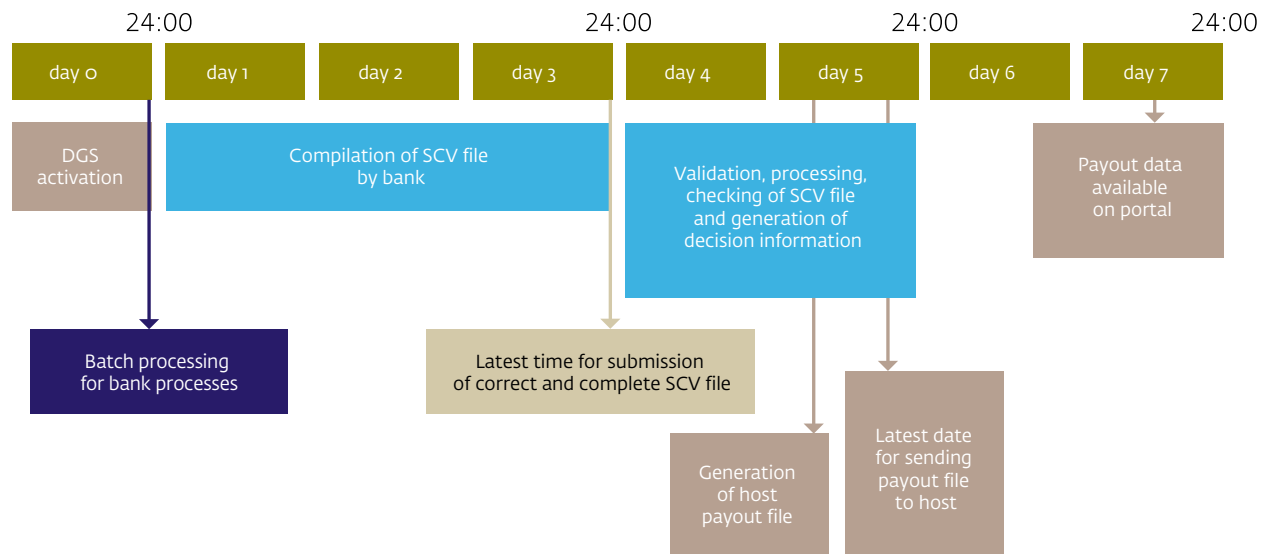
5.2.2 Payout hierarchy

In a DGS situation accounts are paid out in the following sequence in accordance with Section 3.1 of the Policy Rule on the Scope and Implementation of the DGS:

1. **Payout by product type**
   The order of payouts by product type is as follows:
   - Current account
   - Savings account
   - Fixed-term deposits

   - Special accounts
   - Accounts in respect of which DNB cannot determine and pay out the amount eligible on the basis of the data supplied by the bank

   For example, a person has a current account of EUR 100,000 and five savings accounts each of EUR 1,000. The current account is then paid out, and the five savings accounts are left in administration. These balances are then dealt with by the liquidator.

2. **Payout within product type**
   If a depositor has multiple accounts within the same product category, the account with the smallest balance will be paid out first, followed by the account with the next smallest balance, so that as much as possible of the eligible accounts will be paid out.
   For example, a person has three current accounts with the following balances:
   - Current account 1   Balance EUR 50,000
   - Current account 2   Balance EUR 75,000
   - Current account 3   Balance EUR 95,000
   In that case Current account 1 will be settled in full and Current account 2 for an amount of EUR 50,000.
   Current account 2 will remain in administration for an amount of EUR 25,000 and Current account 3 for an amount of EUR 95,000.

5.2.3 Automatic versus manual handling

After the SCV file is received from a bank it is validated. If the file is technically in order and the data can be imported, DNB will determine for each SCV whether it can be handled automatically. This will be done partly on the basis of the markings supplied by the bank[26].

An SCV will be handled manually in the following two situations:
- If the SCV data are of poor quality;
- For various other valid reasons that may require a further analysis or examination.

DNB must process as many applications as possible automatically in order to pay out to as many depositors as possible within seven working days. Banks are responsible for ensuring good data quality so as to minimise the manual handling of SCVs by DNB.

Poor SCV data quality

The SCV data stored in a bank's systems may be of poor quality:
- There is not a sufficient combination of identifying details for a depositor in the bank's systems, so the depositor's identity cannot be established with certainty. In such cases, the bank must mark the depositor as "betrouwbaarheid niet gegarandeerd" (reliability not guaranteed);

- It cannot be established with certainty whether a deposit or depositor is covered by the DGS. In such cases, the bank must mark the deposit and/or depositor as doubtful;
- The data in the SCV file are incorrect or incomplete or has been incorrectly combined.

Examples

A depositor's BSN does not meet the 11-test, the representative of a non-natural person is missing from the file or a general partnership (rather than the partners) is being treated as the depositor and the account is not classified as a "Samenwerkingsverband" (collaborative venture).

Figure 17 Automatic versus manual handling

Payout

Direct payout

- Correct SCV: depositor uniquely identified
- Eligible
- No accounts blocked
- Not deceased
- No escrow account

Manual handling

- Doubt about unique identification
- Doubt about eligibility (deposit or depositor)
- Account blocked
- Deceased
- Escrow accounts

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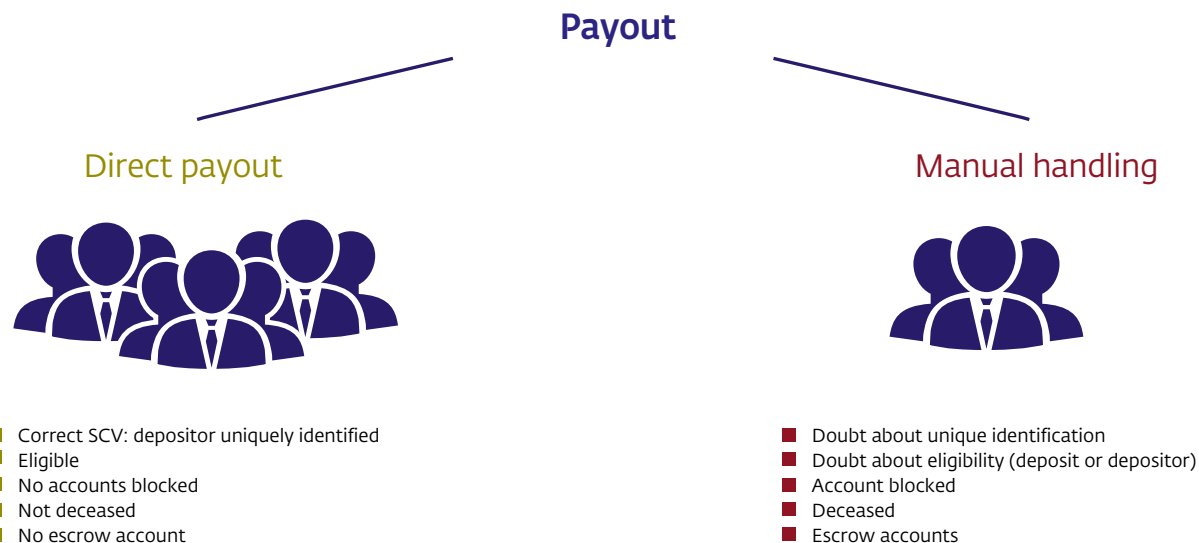
26 These markings are described in Chapter 2 of this Manual and in Sections 2, 5 and 6 of the SCV Policy Rule.

It is essential that banks put in place procedures and controls to ensure the data quality of their record-keeping systems. DNB will monitor compliance with this requirement by performing checks (see Chapter 4).

Various valid reasons for manual handling
Manual handling may be necessary even if the data are of good quality:
■ the type of account cannot be handled automatically, such as an escrow account. The beneficiaries of the balance in an escrow account will need to be identified first. Chapter 2 explains the policy on escrow accounts and how to submit escrow account information;
■ an account has been blocked – a further examination is required before a payout can be made;
■ the depositor or the depositor's (legal) represen-tative is unable to log into the DGS portal using a DigiD, as in the case of a foreign depositor with no BSN;
■ the depositor is marked as "Overleden" (deceased), so it is first necessary to identify the heirs;
■ the depositor claims a temporary high balance of compensation because the account balance is linked directly the performance of a purchase contract for a private residential property (Section 29.02 of the *Bbpm*), which may lead to higher compensation;

■ the depositor contacts DNB after his compensation is published on the web portal, for example due to a missing account or an unidentified account balance;
■ the depositor lodges a formal objection.

Request for information for manual handling purposes
In the case of an escrow account, for example, DNB will actively request information from the failed bank, court bailiffs, notaries, etc. This will be in addition to its assessment of the SCV file. In all other situations, DBN will wait until the depositor or (legal) representative comes forward and then request the required information.

5.3 How the amount covered is calculated in a payout situation

Difference between "eligible" and "covered"
Whether the balance in an account entrusted to a bank is eligible for a DGS payout will depend on three conditions:
■ the bank is covered by the deposit guarantee scheme;
■ the deposits are covered by the deposit guarantee scheme;
■ the depositor is eligible for a payout under the deposit guarantee scheme.

The bank must specify in the SCV file whether a depositor or deposit is eligible.

It is essential to distinguish between "eligible" and "covered". An eligible deposit is one that falls within the scope of the DGS, which means it is not excluded under Section 29.01(2) of the *Bbpm*. The covered part of the deposit is the part of the eligible deposits covered by the DGS (as referred to in Section 7k(1) of the *Bbpm*, namely an amount not exceeding EUR 100,000 per depositor per bank.

| Deposits |
| Eligible |
| Covered ≤ EUR 100,000 |
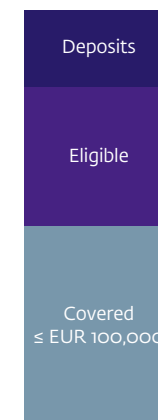
General guiding principles
The bank must include each account in the SCV file in the currency in which the account is held by the bank. In a DGS payout situation, DNB will calculate the covered amount for each depositor. For the quarterly DGS report the bank determines this itself.

The covered amount will be calculated according to the following guiding principles:
■ **Allocation of joint accounts to depositors**: the balance in an account held by multiple depositors will be allocated to them on a *pro rata* basis, unless a different contractual allocation is documented in the bank's records. If so, the bank must state such different allocation in the SCV file. The allocation process will require specific attention if a beneficiary has multiple accounts or shares

accounts with other beneficiaries. The allocation must not involve (legal) representatives, authorised agents or sureties.

No debt set-off: DBN has no authority to set off debts. Debts (including overdrafts on current accounts) cannot be set off against positive balances.

- **Temporary high balances (THB)**[27]: a bank does not have to include a marking in the SCV file for "temporary high balances" (Section 29.02 of the *Bbpm*). A deposit that is linked directly to the performance of a contract for the purchase of a private residential property as defined in Section 3.111 of the Dutch Personal Income Tax Act 2001 (*Wet inkomstenbelasting 2001*) is covered up to an amount of EUR 500,000 per depositor per bank.

This guarantee remains valid for three months after the payment of the deposit and is in addition to the maximum standard guarantee of EUR 100,000. The conditions for temporary high balances are explained further in the "Amendment to the Policy Rule on the Scope and Implementation of the Deposit Guarantee Scheme" of February 2019.

How DNB calculates the compensation payable in a payout situation

DNB will establish the depositor's entitlement in a DGS payout situation according to a number of steps:
1. deposits denominated in a foreign currency are converted into euros at the exchange rates prevailing when the DGS is activated;
2. the depositor's share of a deposit, for example in the case of joint accounts, is identified;
3. the total amount in eligible deposits is calculated;
4. the payout is calculated, subject to a maximum of EUR 100,000 per depositor.

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27 Not to be confused with "Bank savings deposit for a private residential property". See Section 2.2 for further information.

5.4 Selection and use of resolution tools in the event of a resolution

The SCV will not only contribute to a shorter DGS payout deadline, but will also provide the information necessary for resolution planning purposes and to improve a bank's resolvability. This section provides a brief introduction to the resolution duty and explains the legal framework and the link between a resolution and the DGS (and SCV).

Directive 2014/59/EU (also known as the Bank Recovery and Resolution Directive – BRRD), Regulation (EU) No. 806/2014 (Single Resolution Mechanism Regulation – SRMR) and a number of technical standards drawn up by the European Banking Authority together constitute the legal basis for the orderly resolution of a failed bank. The BRRD provides a uniform resolution toolset for EU-based banks, including a common approach to preparing recovery and resolution plans that should enable the orderly resolution of failed banks. In the Netherlands, the BRRD has been transposed into the Financial Supervision Act (*Wet op het financieel toezicht – Wft*) and secondary legislation, such as the Decree on Special Prudential Measures (*Besluit bijzondere prudentiële maatregelen – Bbpm*). DNB was designated as the National Resolution Authority (NRA) on 1 January 2015. With the introduction of the SRM Regulation, DNB has become a part of the European Banking Union's resolution pillar. DNB forms part of the Single Resolution Mechanism (SRM) together with the European resolution authority, the Single Resolution Board (SRB), and other NRAs.

The purpose of resolution is to allow a bank to default without having a material impact on the financial system, the economy or public finances. To achieve this, the resolution authority will focus on the continuity of critical functions. The resolution authority in charge (SRB or NRA) will determine whether a bank needs to be resolved or whether bankruptcy is an acceptable option. The resolution authority will draw up a comprehensive resolution plan for all banks, taking into account the preferred strategy as referred to above. It has power to remove any structural, organisational, financial and operational obstacles. In the event of a bank failure, the SRM will take over from the microprudential regulator and the NRA or SRB will implement the resolution strategy.

Resolution tools
The BRRD describes the tools that the SRB and NRAs can use if a bank fails or is likely to fail. These resolution tools may be used in combination:

- **Bail-in:** this tool is used to allocate the failed bank's losses and recapitalisation costs to its shareholders and creditors where possible. This is to prevent a bail-out and avoid exposing public funds to loss.
- **Transfer of undertaking:** the resolution authority may use this tool to arrange for the transfer of the failed bank's shares or assets and liabilities. The transfer may be to another private party for consideration.
- **Asset management vehicle:** this tool may be used to transfer the failed bank's assets and liabilities to a separate public-law entity that has no banking licence. This will effectively create a "bad bank", which will take over the toxic assets and liabilities in order to clean up the failed bank's balance sheet. The asset management vehicle will try to sell the assets and generate the highest possible proceeds, which will eventually benefit the failed bank's creditors.
- **Bridge bank:** this tool may be used to transfer the failed bank's shares or assets and liabilities to an independent public-law entity, also known as a bridge bank. This is to bridge the period between the failure of a bank and its acquisition by a private party. The aim is to maintain critical banking functions, prevent loss of value and a costly insolvency procedure, and to gain time in order to formulate a sale strategy. A bridge bank will usually have to be sold to a private buyer within two years.

Creditor hierarchy

The BRRD has introduced a key change to the status of depositors within the creditor hierarchy in the event of a bank failure. Under Article 108 of the BRRD, Member States are required to give priority ranking to all deposits of natural persons and micro, small and medium-sized enterprises and to give super-priority ranking to DGS-covered deposits over claims of ordinary unsecured, non-preferred creditors. Deposits of other parties, e.g. financial institutions (which are not eligible for the DGS) and large companies, will continue to rank on a par with senior uncovered bonds. This leads to an adjustment to the creditor hierarchy in the event of a bankruptcy and resolution.

The SCV file indicates the creditor hierarchy, because banks include the customer category (enterprise size) of NNP depositors. This follows from Section 7 of the Single Customer View Policy Rule.

Use of DGS data for resolution purposes

To draw up resolution plans, DNB may request information from institutions. It will draw up the resolution plans on the basis of that information. A resolution plan will be specific to a bank. The resolution authority has the power to request information either directly or indirectly through the regulatory authority in order to draw up and/ or implement a resolution plan. The information necessary to draw up and update these plans may

Position in creditor hierarchy in accordance with the BRRD

Depositor	DGS-cover	≤ EUR 100k	> EUR 100k
(1) Natural person	Yes	Super preferred	Preferred
(2) Legal entity: Micro, small and medium-sized enterprises	Yes	Super preferred	Preferred
(3) Legal entity: corporate	Yes	Super preferred	Non-preferred
(4) Ineligible	No	Non-preferred	Non-preferred

include information on the bank's eligible liabilities, including the deposits held at the bank. The customer category that banks include in the SCV file enables different types of depositors to be distinguished according to the BRRD creditor hierarchy.

Possible division of accounts for bail-in or sale of the undertaking

Under Section 8 of the Single Customer View Policy Rule, DNB can request a bank to have procedures and measures in place to segregate parts of deposits and freeze deposits if a resolution plan so requires. In practice this means that a bank does not have to prepare for such an eventuality unless DNB has expressly requested it as part of the resolution planning and to promote resolvability. This may be the case if DNB, as the NRA, has decided as part of its resolution planning that the preferred resolution strategy will be to sell part of the deposits if the bank gets into difficulty.

5.5 Calculation of the target size of and levies payable into funds

The data in the quarterly DGS reports will be used to calculate the levies payable into the Deposit Guarantee Fund and the resolution funds.

5.5.1 DGS funding

Ex ante funding is a key element of the DGS legislation. The Dutch Deposit Guarantee Fund (DGF) was set up for this purpose at the end of 2015. Banks have paid quarterly contributions into this fund since the first quarter of 2016. DNB is responsible for setting the amount of levies payable by each bank. This levy depends on the amount of covered deposits held by a bank (its deposit base) and its risk profile relative to other banks in the scheme. The fund's target size is 0.8% of the total amount of covered deposits of all banks taken together (around EUR 4 billion) and must be reached by 3 July 2024.

Legal basis for the Deposit Guarantee Fund

The legal basis for the Deposit Guarantee Fund is Section 3:259a of the Financial Supervision Act (*Wft*) Following on from the Act, the *Bbpm* stipulates that banks must contribute to the Deposit Guarantee Fund. The way in which DNB calculates these levies is set out in Section 29.13 of the *Bbpm*.

Structure of the Deposit Guarantee Fund

The DGF consists of two sections: an individual section for each bank and a general section. Both sections have their own function and are made up of the amounts contributed by the banks.

- Each **individual** section comprises the balance allocated to a participating bank. This balance is made up of the basic levies and supplements paid by the bank. The target size for each bank is 0.4% of its deposit base.
- The **general** section comprises the risk-weighted levies payable by banks, i.e. the risk-weighted levy and risk-weighted supplement. The target size for all banks taken together is 0.4% of their total deposit base.

The method of calculating the levies payable into the Deposit Guarantee Fund is set out in the *Bbpm* and the Regulation on Risk Indicators for Payments into the Deposit Guarantee Scheme (*Regeling risico-indicatoren bijdragen depositogarantiestelsel Wft*).

DNB calculates the amount in deposits covered by the DGS (deposit base) on the basis of the reports submitted by banks (see Chapter 3).

Quarterly levies

The quarterly levies are calculated on the deposit base reported by a bank for the previous quarter. To calculate the risk-weighted portion of the levies, DNB also uses information from the other reports submitted by banks, including FINREP and COREP.

Banks will receive a quarterly decision (where applicable, at group level) specifying the levy payable by the bank, divided into a basic levy and risk-weighted levy. These levies are collected by direct debt in TARGET2 based on an authorisation issued by the bank.

New bank

If a new bank has a banking licence and is headquartered in the Netherlands, it falls automatically within the scope of the DGS. From then on the bank will be required to pay into the Deposit Guarantee Fund.

5.5.2 Funding of the resolution fund

In order to ensure effective use of the resolution toolset, the European Single Resolution Fund (SRF) was launched on 1 January 2016. Banks and investment firms that fall within the scope of the SRM Regulation are required to make annual payments into the SRF. The SRF will be funded over a period of eight years (2016-2023) and is being managed by the SRB in Brussels. It can be deployed when a resolution situation requires financing. An exhaustive list of the specific measures that may be funded from the SRF is provided in Article 76 of the SRM Regulation.

The reports specifying the amount of covered deposits are necessary to calculate the target size of the SRF and the individual levies to be contributed by the banks. Over the course of the accrual period, the SRF will eventually amount to 1% of the covered deposits held in the Member States taking part in the SRF (around EUR 55 billion). The amount to be raised annually to achieve the fund's target size is based on the amount of covered deposits at t-1. The SRB will request the information it needs from the DGS authorities in the participating Member States. For its part, DNB will use the quarterly DGS reports submitted by banks (see Chapter 3). The amount in covered deposits will be deducted from the contribution base for purposes of calculating the individual levies, which will lead to a lower levy. Banks will themselves need to report the amount in covered deposits at t-2 using the SRF reporting template. This amount must be consistent with the quarterly DGS reports submitted for the same period.

In accordance with the law, the reports specifying the amount in covered deposits are subject to a number of requirements imposed by the SRB. Requirements

apply to the amounts reported by the individual DGS authorities to calculate the fund's target size (covered deposits at t-1) and to the amounts stated by banks to calculate the levies payable into the fund (covered deposits at t-2). For example, they must supply an average amount over the four quarters of the reporting year, the calculations must be performed according to the SCV method as described in the DGSD and the reports must be submitted per banking licence. These requirements will ensure a level playing field in terms of calculating the SRF levies. The quarterly reports (see Chapter 3) must meet these requirements.

6 Progress of transition and changes

The transition to the payout deadline of seven working days comprises three stages (see Figure 18).

Progress and completion of implementation of the SCV Policy Rule
Banks were required to adapt their processes and systems to the requirements of the policy rule by 1 January 2019. DNB assesses the quality of the supplied SCV file and the control of the SCV system. This assessment is carried out partly on the basis of the SCV file submitted by the bank. DNB may issue a request to this effect at any time and the SCV file must contain all single customer views of depositors based on the bank's up-to-date data. To assess the controls in place for the SCV system, DNB uses the periodic opinions issued by the bank's internal and external auditors.

During the transition phase DNB's assessment will take place on the basis of a pre-production file. The minimum requirement was that prior to 1 January 2019, banks could supply a pre-production file that DNB was able to process. Notification in the DLR that the delivery has been accepted by DNB does not signify, however, that the bank is fully compliant with the SCV Policy Rule and that there are no further findings. A file supplied for technical processing by DNB may still present major quality issues. DNB will therefore place more emphasis on data quality assessment in the

second stage of the transition, in particular addressing data quality issues which, although not leading to a rejection of the submitted SCV file, will prevent DNB from determining the depositors' claim or paying out within seven working days. Although the process of data quality improvement is due to continue until 2024, DNB expects banks to address the most serious data quality issues in 2019 (see Figure 19).

Depending on the findings, DNB will request the bank to take appropriate measures to improve the quality. Poor quality in the SCV system and the resulting SCV file would impede the resolution and administration of a failing bank (DGS). Banks that have not yet met this requirement will need to be able to continue to supply data according to the old method after 1 January 2019 (as described in version 2.0 of the Manual).

A bank must also be able to carry out an **accepted** SCV data delivery with the **full** production file within three working days. Once banks have completed an accepted data delivery, DNB expects them to have secured technical compliance with the DDA in the SCV system and that subsequent deliveries will entail no blocking findings. If the DDA is implemented correctly, any blocking findings will be detected in the SCV system before the files are delivered to DNB.

Figure 18 Stages of transition period to reduced payout deadline

Statutory payout deadline
Intended payout deadline
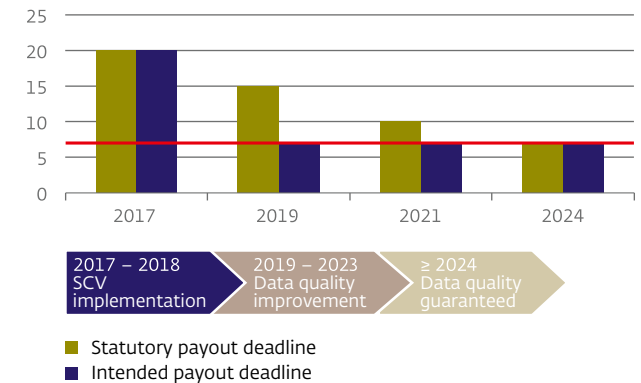
Figure 19 Expected curve for approach to resolving data quality issues by banks
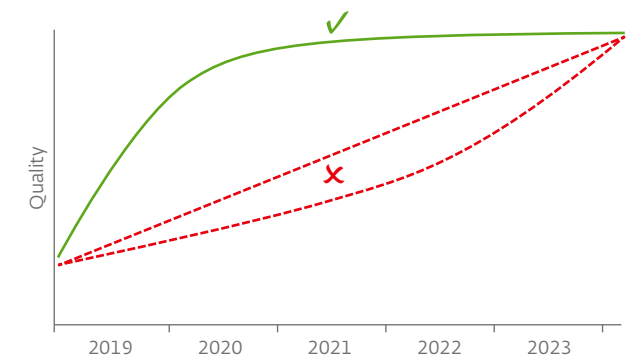
For the period from 1 July 2019 to 1 January 2020, all data deliveries up to and including 31 December 2019 must be made in accordance with the requirements of DDA version 1.0.4. To allow banks a six month period to prepare for data deliveries compliant with the new version of the DDA (version 1.1.0), this new version was published on 1 July 2019 alongside version 1.0.4 on the website of DNB. Version 1.1.0 will come into force on 1 January 2020.

- Deliveries must not be made on the basis of DDA 1.1.0 before 1 January 2020.
- Deliveries in accordance with DDA 1.0.4. will no longer be permitted after 31 December 2019.

Section 12 of the SCV Policy Rule (see Section 4.3) describes the role of the external auditor in assessing a bank's SCV system. The external auditor's engagement for the 2018 reporting year is based on ISAE 3402 type 1. From the 2019 reporting year it will be based on ISAE 3402 type 2.

7 Appendices

Appendix 1 Acronyms

AMvB	General Administrative Order (*Algemene Maatregel van Bestuur*)	**DDA**	Data Delivery Agreement
Art	Article	**IBAN**	International Bank Account Number
Bbpm	Decree on Special Prudential Measures, Investor Compensation and Deposit Guarantees under the Financial Supervision Act (*Besluit bijzondere prudentiële maatregelen, beleggerscompensatie en depositogarantie Wft*)	**UCITS**	Undertaking for Collective Investment in Transferable Securities
		SCV	Single Customer View
		ISO	International Organization for Standardization
Bpr	Decree on Prudential Rules for Financial Undertakings (*Besluit prudentiële regels Wft*)	**CoC**	Chamber of Commerce
		NEN	Dutch normalisation standard
BRRD	Bank Recovery and Resolution Directive (Directive 2014/59/EU)	**NRA**	National Resolution Authority
BSN	Citizen Service Number	**NRF**	National Resolution Fund
BV	Private limited company	**NV**	Public limited company
COREP	Common Reporting	**NVB**	Dutch Banking Association
CV	Limited partnership	**RWT**	Legal entity entrusted with a statutory task
DGF	Deposit Guarantee Fund	**SBI**	Standard Industrial Classification (Dutch version)
DGS	Deposit Guarantee Scheme	**SRB**	Single Resolution Board
DGSD	European Deposit Guarantee Schemes Directive (Directive 2014/49/EU)	**SRF**	Single Resolution Fund
DLR	DNB's Digital Reporting Portal (*Digitaal Loket Rapportages*)	**SRM**	Single Resolution Mechanism
DNB	De Nederlandsche Bank NV	**SVU**	Reduced Payout Deadline Subgroup
ECB	European Central Bank	**TARGET2**	Interbank payment system for the real-time processing of cross-border payments within the European Union
EEA	European Economic Area		
EU	European Union	**THB**	Temporary high balances
FINREP	EBA guideline for implementation of the framework for consolidated financial reporting	**TIN**	Tax Identification Number
		VOF	General partnership
FLDM	Formal Logical Data Model	**Wft**	Dutch Financial Supervision Act (*Wet op het financieel toezicht*)
Fw	Bankruptcy Act (*Faillissementswet*)	**ZBO**	Independent public body

Appendix 2 Definitions

Glossary

Bank   a deposit-taker whose deposits are covered by the deposit guarantee scheme, as defined in Section 29.01 of the *Bbpm*;

Deposit guarantee scheme   as referred to in Section 3:259(2) of the *Wft; a scheme guaranteeing depositors' claims on banks against the risk that these banks will not be able to meet their liabilities in respect of such claims;*

Covered deposit   as defined in Section 7k(1) of the *Bbpm,* i.e. *the portion of eligible deposits that is effectively covered by the DGS (subject to a maximum of EUR 100,000 per depositor);*

Depositor   the holder or, in the case of a joint account as referred to in Section 29.02(2) of the *Bbpm,* each of the holders of a deposit, including a third party as referred to in Section 29.02(3) of the *Bbpm,* i.e. *the person who is entitled to all or any part of the funds deposited with a bank;*

Single customer view   a summary of all deposits held by a depositor at a bank in accordance with the data template referred to in Section 2 of the SCV Policy Rule showing all the data to be submitted, i.e. *an overall view of each depositor's aggregate funds, supplemented with specific details and markings that DNB requires to be able to pay out compensation;*

SCV file   a data set that meets the design requirements of Section 2 of the SCV Policy Rule and comprises all single customer views of a bank, i.e. *the data set that a bank needs to supply to enable DNB to pay compensation;*

SCV system   the set of procedures and controls a bank can use to produce an SCV file, to calculate the eligible and covered amounts and to take any resolution action, in a manner and within a time period specified by DNB;

Eligible deposit   a deposit covered by the operation of the deposit guarantee scheme;

Eligible depositor   a depositor that is not excluded under Section 29.01(2)(a) of the *Bbpm*;

Micro, small and medium-sized enterprises   as defined in Section 212g(1)(n) of the Dutch Bankruptcy Act; micro, small and medium-sized enterprises as defined on the basis of the annual turnover criterion specified in the European Commission recommendation of 6 May 2003 concerning the definition of micro, small and medium-sized enterprises (OJEU 2003, L 124/16);

Representative   a person authorised to perform acts on the depositor's behalf as referred to in Section 29.07(1) of the *Bbpm*.

Appendix 3 Standards

NEN 1888

This appendix includes the relevant definitions and exchange formats of the NEN 1888 standard to which reference is made in this Manual. Where reference is made below to alphabetical characters, this means not only the 26 uppercase and lowercase letters, but also related characters such as diacritics and ligatures. The UTF-8 coding is used for this purpose.

A	Aus den	Dalla	Di	La	Op t	Thor	Van	von den
a	aus den	dalla	di	la	op t	thor	van	Von der
Aan	Aus der	Das	Die le	Las	Op 't	To	Van de	von der
aan	aus der	das	die le	las	op 't	to	van De	Von t
Aan de	Aus m	De	Do	Le	Op ten	Toe	van de	von t
aan de	aus m	de	do	le	op ten	toe	Van de l	Von 't
Aan den	Aus 'm	De die	Don	Les	Over	Tot	van de l	von 't
aan den	aus 'm	de die	don	les	over	tot	Van de l'	Voor
Aan der	Ben	De die le	Dos	Lo	Over de	Uijt	van de l'	voor
aan der	ben	de die le	dos	lo	over de	uijt	Van Den	Voor de
Aan het	Bij	De l	Du	Los	Over den	Uijt de	Van den	voor de

aan het	bij	de l	du	los	over den	uijt de	van den	Voor den
Aan t	Bij de	De l'	El	Of	Over het	Uijt den	Van Der	voor den
aan t	bij de	de l'	el	of	over het	uijt den	Van der	Voor in t
Aan 't	Bij den	De la	Het	Onder	Over t	Uijt 't	van der	voor in t
aan 't	bij den	de la	het	onder	over t	uijt 't	Van gen	Voor in 't
Af	Bij het	De las	I	Onder de	Over 't	Uijt te de	van gen	voor in 't
af	bij het	de las	i	onder de	over 't	uijt te de	Van het	Voor 't
Al	Bij t	De le	Im	Onder den	S	Uijt ten	van het	voor 't
al	bij t	de le	im	onder den	s	uijt ten	Van la	Vor
Am	Bij 't	De van der	In	Onder het	'S	Uit	van la	vor
am	bij 't	de van der	in	onder het	's	uit	Van t	Vor der
Am de	Bin	Deca	In de	Onder t	S'	Uit de	van t	vor der
am de	bin	deca	in de	onder t	s'	uit de	Van 't	Zu
Auf	Boven d	Degli	In den	Onder 't	T	Uit den	van 't	zu
auf	boven d	degli	in den	onder 't	t	uit den	Van ter	Zum
Auf dem	Boven d'	Dei	In der	Op	'T	Uit het	van ter	zum
auf dem	boven d'	dei	in der	op	't	uit het	Van van de	Zur
Auf den	D	Del	In het	Op de	Te	Uit t	van van de	zur
auf den	d	del	in het	op de	te	uit t	Ver	
Auf der	D'	Della	In t	Op den	Ten	Uit 't	ver	
auf der	d'	della	in t	op den	ten	uit 't	Vom	
Auf ter	Da	Den	In 't	Op der	Ter	Uit te de	vom	
auf ter	da	den	in 't	op der	ter	uit te de	Von	
Aus	Dal	Der	L	Op gen	Tho	Uit ten	von	
aus	dal	der	l	op gen	tho	uit ten	Von dem	
Aus dem	Dal'	Des	L'	Op het	Thoe	Unter	von dem	
aus dem	dal'	des	l'	op het	thoe	unter	Von den	

Definition

Significant part of the surname (limited length)	The surname without prefix and without the separator space following the prefix. At most seventy (70) alphabetical characters and/or spaces. The restricted length can be used if the parties involved consider that the exchange of 70 characters is sufficient. If the main part of the surname consists of two or more hyphenated ("-") elements, no space is placed before or after the hyphen in a data exchange.
Initials (first name abbreviated to one or more letters)	The collection of letters comprising the first letter of all the first names occurring in sequence. This element is derived from the given 'first names'. To avoid any misunderstanding, the initials of the names Jan Pieter, Christiaan, Philip, Theo and IJsbrand are "J", "C", "P", "T" and "I" respectively.
Date of birth	A person's date of birth. Fixed length and fixed format: YYYY-MM-DD
Prefix	The series of one or more prepositions and/or articles which, for purposes of this standard, precede the main part of the surname; the prefixes and surname together constitute the surname. No more than ten (10) alphabetical characters and/or spaces. The table below lists all prefixes designated as such for the purposes of this standard. They are separated from the main part of the surname by a space. For example, the name d'Ancona has no prefix and constitutes the main part of the surname.

ISO standards

ISO standards are internationally adopted quality standards. They allow banks to supply data in the SCV file uniformly.

> **Please note:**
> All fields in the data model governed by an ISO standard must be completed in accordance with the standard.

Field	ISO standard
Country code	ISO 3166-1 Alpha 2
Currency	ISO 4217
BIC	ISO 9362
IBAN	ISO 13616
Date/Time	ISO 8601
Language	ISO 639-1

A number of other, non-field-related ISO standards also apply to the SCV process.

ISO standard
ISO/IEC 27001:2005 Exchange solution security standards
ISO/IEC 18033 Information technology – Security techniques – Encryption algorithms.
ISO 9000 Accreditation for central supplier if exchange solution is to be delivered by third party
ISO22301 industry standard for Disaster Recovery / Business Continuity for central supplier, for full scope of the services
ISO 27001 Information technology — Security techniques — Information security management systems — Requirements

More information on these ISO standards can be found at
http://www.iso.org/iso/home.html

Appendix 4 Definitions for list of product codes

List:
- Current account
- Savings account
- Fixed-term deposit
- Investor account (cash account)
- Bank savings deposit for a private residential property
- Tax-efficient savings account
- Credit card

Current account

Field code	REK-BETAAL
Description	An account that allows use of a bank's payment services, such as transferring money to a third party, depositing or receiving money, withdrawing money or direct debits.
Characteristics	■ The account usually pays variable interest or no interest. ■ Unlimited withdrawals at all times. ■ Paying money into the account is allowed at all times.
Examples	Current accounts, credit balances from a loan linked to early repayments in excess of the principal, seal bags.

Savings account

Field code	REK-SPAAR
Description	An account in which money is saved for (usually) a non-fixed period of time at (usually) a variable rate of interest.
Characteristics	■ The money in the account usually earns variable interest, but in some cases a fixed rate of interest. ■ Withdrawals are usually free, with no limitations in terms of the time of withdrawal. ■ Paying extra money into the account is usually allowed, but not in all cases. ■ Unlike a current account, it is not usually possible for the money in a savings account to be transferred directly to a third-party account; in many cases the payee account can only be a fixed, linked account. Cash withdrawals are sometimes allowed, as are transfers to another account of the same account holder at the same bank. Similar restrictions often apply to payments into the account. ■ A savings account may sometimes be subject to restrictive requirements, such as: a cap on the account balance that earns interest, a cap on the withdrawals allowed to be made in a particular period, a short cooling-off period before all or any part of the balance in the account can be withdrawn, the obligation to set up a direct debit for a fixed sum of money to be transferred periodically from a linked account to the savings account.
Examples	Instant-access savings accounts, savings accounts for children under 18, electronic gold/silver accounts.

Fixed-term deposit

Field code	REK-TERMIJNDEP
Description	A blocked account on which money is deposited for a fixed term at a fixed rate of interest.
Characteristics	■ The account pays a fixed rate of interest. The fixed term can range from one month to several years. ■ No early withdrawals are allowed (or perhaps only with a penalty) ■ Additional deposits are not usually allowed, but may sometimes be possible. ■ These include time deposits (maximum of one year) and pure savings deposits (term of more than year).[28]
Examples	Savings deposits, registered bonds.

Investor account (cash account)

Field code	REK-BELEG
Description	An account used primarily to carry out investment transactions. The balance in the account may be used to buy securities. Any dividends received will usually also be paid into the investor account. An investor account is usually linked to a securities account, in which the securities are held.
Characteristics	■ The balance in the account may accrue interest. ■ The balance in the account may usually be withdrawn without a penalty.
Examples	The balance in an investor account that is not invested in equities or other financial instruments.

Bank savings deposit for a private residential property

Field code	REK-WONING
Description	An account held for the sole purpose of repaying a home loan. In the SCV file it is categorised as not covered by the DGS.
Examples	Bank savings deposits for a private residential property.

Tax-efficient savings account

Field code	REK-FISCAAL
Description	An account held only or primarily for tax benefits (e.g. pension).
Examples	Life-course savings schemes, bank savings products, annuities.

Credit card

Field code	REK-CREDITCARD
Description	An account used only or primarily to process credit card payments. All credit card accounts must be submitted in the SCV file irrespective of the balance (positive, negative or zero), provided the product conditions clearly state that a positive balance may be held on the account.

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28 Some banks use the term "time deposit" as a synonym of "savings deposit". Deposits held for a longer period may therefore sometimes be referred to as time deposits.

Type of account	Main purpose	Interest	Term	Transfers	Withdrawals	Additional deposits
Current account	Make payments	Possible, variable	Not fixed	Yes	Yes	Yes
Savings account	Savings held for indefinite period	Yes, usually variable	Usually for indefinite period	To own accounts only	Usually free, sometimes subject to restrictions	Usually possible, sometimes subject to restrictions
Fixed-term deposit	Savings held for definite duration	Yes, usually fixed	Set period of time	To own accounts only	Early withdrawal not possible, but sometimes allowed with penalty	Not usually possible.
Bank savings deposit for a private residential property	Deposit built up to repay a home loan					
Investor account	Conduct of investment transactions	n/a				
Escrow account	Money held in account operated by third party					
Tax-efficient savings account	To hold money for tax reasons					
Credit card account	To make credit card payments					

Appendix 5 Definitions of **ineligible** customers

Under the *Bbpm*, banks are obliged to determine whether their customers fall within the scope of the DGS. To do so, banks must assess whether their customers meet the criteria set out in Section 29.01(2) of the *Bbpm*.

The deposit guarantee scheme does not apply to:
a. deposits of:
  1. banks, if the deposits are held by the bank in its own name and for its own account;
  2. financial institutions;
  3. investment firms;
  4. depositors who have not identified themselves in accordance with Section 4 (1) of the Dutch Act on the Prevention of Money Laundering and Terrorism Financing (Wet ter voorkoming van witwassen en financieren van terrorisme);
  5. insurance and reinsurance undertakings as defined in Article 13(1) to (6) of the Solvency II Directive.
  6. investment undertakings, managers of investment undertakings, UCITS and managers of UCITS;
  7. pension funds;
  8. public authorities.

Part I of this appendix gives more detailed definitions of the customer categories referred to above, which are not eligible for compensation under the DGS.

Part II of this appendix provides guidance on how to establish customer categories.

Part I
The customer categories that are ineligible for the DGS are defined in more detail below, based on the definitions in the Dutch Financial Supervision Act (Section 1:1 of the *Wft*). Further guidance is also given on the interpretation of terms used in those initial definitions (e.g. "providing an investment service").

1. Bank: a credit institution as referred to in Article 4 of the Capital Requirements Regulation, other than a credit union whose registered office is situated in the Netherlands, it being understood that, unless otherwise provided, the holder of a licence as referred to Section 3:4 is equated with a bank.

2. Financial institution: any party other than a bank whose main business is the provision of one or more services as referred to in points 2 to 12 and 15 of Annex I to the Capital Requirements Directive [see below] or the acquisition or holding of units;

Annex I to the Capital Requirements Directive
LIST OF ACTIVITIES SUBJECT TO MUTUAL RECOGNITION
1. [...]
2. Lending, including consumer credit, loan agreements relating to immovable property, factoring (with or without recourse), financing of commercial transactions (including forfeiting).
3. Financial leasing.
4. Payment services as defined in Article 4(3) of Directive 2007/64/EC.
5. Issuing and administering other means of payment (e.g. travellers' cheques and bankers' drafts) insofar as such activity is not covered by point 4.
6. Guarantees and commitments.
7. Trading for own account or for the account of customers in any of the following:
    a) money market instruments (cheques, bills, certificates of deposit, etc.);
    b) foreign exchange;
    c) financial futures and options;
    d) swaps and similar financial instruments;
    e) securities;
8. Participation in securities issues and the provision of services relating to such issues.

9. Advice to businesses on capital structure, industrial strategy and related questions and advice as well as services relating to mergers and acquisitions.
10. Money broking.
11. Portfolio management and advice.
12. Custody and administration of securities.
[...]
15. Issuing electronic money.

3. **Investment firm:** any party that provides an investment service or performs an investment activity;

providing an investment service:
a. in the conduct of a profession or business to receive and pass on orders from customers relating to financial instruments;
b. in the conduct of a profession or business to execute orders relating to financial instruments for the account of customers;
c. to manage an individual customer's assets;
d. in the conduct of a profession or business to render advice on financial instruments;
e. in the conduct of a profession or business to underwrite financial instruments or place financial instruments on a firm commitment basis as referred to in Section 5.1;
f. in the conduct of a profession or business to place financial instruments without a firm commitment basis as referred to in Section 5.1;

performing an investment activity:
a. in the conduct of a profession or business to deal for its own account;
b. in the conduct of a profession or business to operate a multilateral trading facility.

5. **Insurance and reinsurance undertakings** as defined in Article 13(1) to (6) of the Solvency II Directive. The terms "insurance company" and "reinsurance company" do not appear in the Dutch Financial Supervision Act. The Act does use the terms "insurance undertaking" and "reinsurance undertaking" but only specifically in relation to the Solvency II Directive. Article 13 of the Solvency II Directive gives the following definitions:

1. *insurance undertaking:* a direct life or non-life insurance undertaking which has received a licence in accordance with Article 14;
2. *captive insurance undertaking:* an insurance undertaking, owned either by a financial undertaking other than an insurance or reinsurance undertaking or a group of insurance or reinsurance undertakings within the meaning of Article 212(1)(c) or by a non-financial undertaking, the purpose of which is to provide insurance cover exclusively for the risks of the undertaking or undertakings to which it belongs or of an undertaking or undertakings of the group of which it is a member;

3. *third-country insurance undertaking:* an undertaking which would require a licence as an insurance undertaking in accordance with Article 14 if its head office were situated in the Community;
4. *reinsurance undertaking:* an undertaking which has received a licence in accordance with Article 14 to pursue reinsurance activities;
5. *captive reinsurance undertaking:* a reinsurance undertaking, owned either by a financial undertaking other than an insurance or reinsurance undertaking or a group of insurance or reinsurance undertakings within the meaning of Article 212(1)(c) or by a non-financial undertaking, the purpose of which is to provide reinsurance cover exclusively for the risks of the undertaking or undertakings to which it belongs or of an undertaking or undertakings of the group of which it is a member;
6. *third-country insurance undertaking:* an undertaking which would require a licence as a reinsurance undertaking in accordance with Article 14 if its head office were situated in the Community.

These specifically involve insurance and reinsurance undertakings which have received a licence under Article 14 of the Solvency II Directive. They are not what the Dutch Financial Supervision Act refers to as "insurers with a limited risk appetite", i.e.:
- small insurers (see Article 4 of the Solvency II Directive);
- mutual insurance companies;

■ (in-kind) funeral services insurers.
These are covered by the DGS.

Article 4 of the Solvency II Directive
Exclusion from scope due to size
1. *Without prejudice to Article 3 and Articles 5 to 10, this Directive shall not apply to an insurance undertaking which fulfils all the following conditions:*
   a) *the undertaking's annual gross written premium income does not exceed EUR 5 million;*
   b) *the total of the undertaking's technical provisions, gross of the amounts recoverable from reinsurance contracts and special purpose vehicles, as referred to in Article 76, does not exceed EUR 25 million;*
   c) *where the undertaking belongs to a group, the total of the technical provisions of the group defined as gross of the amounts recoverable from reinsurance contracts and special purpose vehicles does not exceed EUR 25 million;*
   d) *the business of the undertaking does not include insurance or reinsurance activities covering liability, credit and suretyship insurance risks, unless they constitute ancillary risks within the meaning of Article 16 (1);*
   e) *the business of the undertaking does not include reinsurance operations exceeding EUR 0.5 million of its gross written premium income or EUR 2.5 million of its technical provisions gross of the amounts recoverable from reinsurance contracts and special purpose vehicles, or more than 10% of*
   its gross written premium income or more than 10% of its technical provisions gross of the amounts recoverable from reinsurance contracts and special purpose vehicles.
2. *If any of the amounts set out in paragraph 1 is exceeded for three consecutive years, this Directive shall apply as from the fourth year.*
3. *By way of derogation from paragraph 1, this Directive shall apply to all undertakings seeking a licence to pursue insurance and reinsurance activities of which the annual gross written premium income or technical provisions gross of the amounts recoverable from reinsurance contracts and special purpose vehicles are expected to exceed any of the amounts set out in paragraph 1 within the following five years.*
4. *This Directive shall cease to apply to those insurance undertakings for which the supervisory authority has verified that all of the following conditions are met:*
   a) *none of the thresholds set out in paragraph 1 has been exceeded for the three previous consecutive years; and*
   b) *none of the thresholds set out in paragraph 1 is expected to be exceeded during the following five years.*
   For as long as the insurance undertaking concerned pursues activities in accordance with Articles 145 to 149, paragraph 1 of this Article shall not apply.
5. *Paragraphs 1 and 4 shall not prevent any undertaking from applying for a licence or continuing to be licensed under this Directive.*

6. **(a) Investment undertaking:** an investment undertaking as defined in Article 4(1)(a) of the Alternative Investment Fund Managers Directive in the form of an investment fund or investment company.

   investment fund: assets that have not been transferred to an investment company and which comprise funds or other commodities requested or obtained for the purpose of collective investment, in order that the unit holders can share in the proceeds of the investments;

   investment company: a legal entity other than an undertaking for collective investment in transferable securities which requests or obtains funds or other commodities for collective investment purposes so as to allow investors to share in the proceeds of those investments;

   investment undertakings as defined in Article 4(1)(a) of the Alternative Investment Fund Managers Directive (AIFs: alternative investment funds):
   collective investment undertakings, including investment compartments thereof, which:
   i) raise capital from a number of investors, with a view to investing it in accordance with a defined investment policy for the benefit of those investors; and

ii) do not require a licence pursuant to Article 5 of Directive 2009/65/EC (i.e. which are not undertakings for collective investment in transferable securities (UCITS)).

6. **(b) Manager of an investment undertaking:** any party which, in the conduct of a profession or business, manages one or more investment undertakings.

6. **(c) UCITS:** a company for collective investment in transferable securities or a fund for collective investment in transferable securities, in the form of:
   a. an undertaking as defined in Article 1(2) of the UCITS Directive;
   b. a feeder UCITS; or
   c. a master UCITS which has at least two feeder UCITS as unit holders and whose units are transferable and will be repurchased or redeemed directly or indirectly out of its assets at the unit holders' request;

   feeder UCITS: a UCITS which invests at least 85% of its assets in units of a master UCITS;
   master UCITS: a UCITS which:
   a. has at least one feeder UCITS among its unit holders;
   b. is not itself a feeder UCITS; and
   c. does not hold units of a feeder UCITS.

6. **(d) Manager of a UCITS:** any party which, in the conduct of a profession or business, manages one or more UCITS.

7. **Pension fund (as defined in the Pensions Act):** a legal entity other than a premium pension institution into which payments are made or were made for the benefit of at least two members, former members or their surviving relatives and which is managed for purposes of administering at least one basic pension scheme.

Because the *Bbpm* is not based on the Pensions Act, this definition is not legally decisive when interpreting the term "pension fund" as used in the *Bbpm*. It would nonetheless seem useful to use this definition in order to interpret the *Bbpm*. An added benefit for banks is that the pension funds referred to in the Pensions Act are listed in a register kept by DNB. Premium pension institutions would then be covered.
Please note: an *occupational pension fund* as defined in the Mandatory Occupational Pension Schemes Act (*Wet verplichte beroepspensioenregeling*) is also a pension fund as defined in the Pensions Act.

8. **Public authorities:**
   ■ The Dutch State, provincial authorities, municipal authorities and water control boards.
   ■ Supranational bodies with powers under public law, such as the European Commission and NATO.
   ■ Legal entities entrusted with a statutory task.

The DGSD also uses the term "public authorities". Recital 31 to the DGSD stipulates that certain depositors should not be eligible for deposit protection, such as public authorities and financial institutions, because of the limited number of those depositors and the fact that public authorities have much easier access to credit than citizens. The argument of public authorities having easy access to credit is apparently based on the fact that they can impose direct or indirect taxes and cannot therefore become insolvent. Along the same lines, the explanatory memorandum to the Dutch Decree implementing the DGS (last November's amended General Administrative Order) states that the DGDS apparently considers the fact that public authorities can impose tax or other levies to be decisive.

This is true for all bodies referred to in Section 2:1(1) of the Dutch Civil Code: The Dutch State, provincial authorities, municipal authorities and water control boards. Moreover, legal entities incorporated under public law are also – indirectly – supported by taxes or levies.

Similarly, supranational bodies with powers based in public law, which are usually incorporated under the terms of a treaty, have a funding structure that in one way or another involves taxation (European Commission, NATO, etc.). They cannot levy tax themselves and are funded by national governments. These national governments have an obligation to fund these supranational bodies and will have to levy tax to do so.

In some cases, legal entities incorporated under private law that have been entrusted with a public task also have power to impose a levy, such as the Netherlands Authority for the Financial Markets (AFM), which is a foundation, and DNB, which is a public limited company. Moreover, they are funded indirectly from taxpayers' money. They also appear to fall within the scope of "public authorities" as defined in the DGSD, although this term has a wider scope than the Dutch term "overheden". They are legal entities with a statutory task (Dutch acronym: *RWT*). A list of RWTs is kept by the Dutch Court of Audit and is available at (https://www.rekenkamer.nl/onderwerpen/ instellingen-op-afstand-van-het-rijk/rechtspersonen-met-een-wettelijke-taak). These legal entities are public authorities as referred to here.

It should be noted that RWTs often also have the status of independent public bodies (Dutch acronym: *ZBO*). However, many ZBOs come under the Dutch State (in the form of agencies) and, as such, are not RWTs. In terms of private law, they come under the State. A deposit held by a ZBO that is not an RWT is actually held by the Dutch State and does not therefore fall within the scope of the DGS. To be absolutely certain, banks should investigate whether deposits are registered to an institution that is on the list of ZBOs: https://almanak.zboregister.overheid.nl/.

Part II
This part provides guidance on the basis of which banks can classify a counterparty into a particular customer category and determine whether or not it is eligible for the DGS.

Financial undertakings
The DNB/AFM's register may be used as a tool to determine whether financial undertakings are eligible for the DGS. The register lists not only the parties that have received a licence from DNB/AFM, but also those that have received a licence from a regulatory authority in another Member State and who operate in the Netherlands through a branch or by providing cross-border services. The register also features undertakings that have been exempted from the licensing requirement. Section 1:107(2) of the *Wft* lists the undertakings that need to be included on the DNB/AFM register. The majority of undertakings that are not covered will therefore appear in the register.

Please note that the register does not include all undertakings that are not covered. It does not include, for instance, a financial undertaking which is a customer of a branch in another Member State of a DNB-supervised bank (a "Dutch" bank) and which does not operate in the Netherlands. The Dutch bank falls within the scope of the Dutch DGS, but the financial undertaking is excluded and will not appear on the DNB/AFM register.

Other ineligible customer categories
As far as other customer categories are concerned, banks may use the Standard Industrial Classification (SBI) codes (Dutch version) as a guide. They should note, however, that:
- Chamber of Commerce registrations are not always reliable;
- Banks should also assess any secondary activities;
- Banks remain responsible for making the correct determination.

Below is a list of customer categories whose eligibility or ineligibility for the DGS is less obvious. Customer categories with the SBI codes that are not included in the list below are eligible for the DGS.

The list below should be used for Dutch customers only. Customers of foreign-based branches should be mapped to similar codes (e.g. the North American Industry Classification System – NAICS).

"To be determined by bank" means that the respective SBI code includes organisations which **are** covered by the DGS and organisations which are **not**.

Let us take, for example, the SBI code for 'swimming pool'. A municipal swimming pool is part of a public authority, so does not fall within the DGS; a commercially operated swimming pool is not part of a public authority and does fall within the DGS. Nevertheless, both have the same SBI code.

An organisation may be allocated multiple SBI codes, for example for its principal and secondary activities. If an organisation has a secondary activity that is ineligible for the DGS, for example, the **whole** organisation is **ineligible** for the DGS.

The Chamber of Commerce may also have allocated an SBI code to an organisation that does not match its actual activities.

The bank is therefore ultimately responsible for determining, by means of customer research, whether the organisation is covered by the DGS.

SBI code	Description	Eligible
6411	Central banks	no
64191	Cooperative banks	no
64192	Stock credit companies	no
64193	Savings banks	no
64194	General banks	no
6420	Financial holdings	to be determined by the bank
64301	Investment funds in financial assets	no
64302	Investment funds in real estate	no
64303	Investment funds with restricted entry	no
6491	Financial leasing	no
64921	Mortgage banks and building funds	no
64922	Municipal credit banks and commercial finance companies	no
64923	Participation companies	no
64924	Bill brokers and other credit granting	no
6499	Other financial intermediation	no
65111	Life insurance (no reinsurance)	to be determined by the bank
65112	Insurance in kind	to be determined by the bank
65113	Slate clubs	no
6512	Non-life insurance (no reinsurance)	to be determined by the bank
6520	Reinsurance	no
65301	Industry pension funds	no

SBI code	Description	Eligible
65302	Corporate pension funds and saving funds	no
65303	Pension funding for specific professional groups	no
65309	Other pension funding	no
6611	Administration of financial markets	no
6612	Stockbrokers, investment consultants, etc.	no
66191	Trust offices	yes
66192	Market makers	no
66193	Mortgage, credit and currency brokers, bank and savings bank agencies, etc.	yes
6621	Risk and damage evaluation	yes
6622	Insurance agents	yes
66291	Insurance markets	yes
66292	Actuarial and pension consultancy; management of pension funds	yes
66293	Guarantee funding	no
66299	Other services related to insurance and pension funding	yes
6630	Fund management	no
8411	General public administration	no
8412	Public administration in the field of health care, education, cultural services and social services (no social security)	no
8413	Public administration in the field of operation of businesses	no
8421	Foreign affairs	no
6411	Central banks	no

SBI code	Description	Eligible
64191	Cooperative banks	no
64192	Stock credit companies	no
64193	Savings banks	no
64194	General banks	no
6420	Financial holdings	to be determined by the bank
64301	Investment funds in financial assets	no
64302	Investment funds in real estate	no
64303	Investment funds with restricted entry	no
6491	Financial leasing	no
64921	Mortgage banks and building funds	no
64922	Municipal credit banks and commercial finance companies	no
64923	Participation companies	no
64924	Bill brokers and other credit granting	no
6499	Other financial intermediation	no
65111	Life insurance (no reinsurance)	to be determined by the bank
65112	Insurance in kind	to be determined by the bank
65113	Slate clubs	no
6512	Non-life insurance (no reinsurance)	to be determined by the bank
6520	Reinsurance	no
65301	Industry pension funds	no
65302	Corporate pension funds and saving funds	no

SBI code	Description	Eligible
65303	Pension funding for specific professional groups	no
65309	Other pension funding	no
6611	Administration of financial markets	no
6612	Stockbrokers, investment consultants, etc.	no
66191	Trust offices	yes
66192	Market makers	no
66193	Mortgage, credit and currency brokers, bank and savings bank agencies, etc.	yes
6621	Risk and damage evaluation	yes
6622	Insurance agents	yes
66291	Insurance markets	yes
66292	Actuarial and pension consultancy; management of pension funds	yes
66293	Guarantee funding	no
66299	Other services related to insurance and pension funding	yes
6630	Fund management	no
8411	General public administration	no
8412	Public administration in the field of health care, education, cultural services and social services (no social security)	no
8413	Public administration in the field of operation of businesses	no
8421	Foreign affairs	no
8422	Defence activities	no
84231	Jurisdiction	no

SBI code	Description	Eligible
84232	Ministry of Justice and prisons	no
8424	Police	no
8425	Fire brigade	no
8430	Compulsory social security	no
85201	Primary compulsory education	to be determined by the bank
85202	Special primary education	to be determined by the bank
85203	Special education in expertise centres	to be determined by the bank
85311	Senior general secondary education and pre-university education	to be determined by the bank
85312	Lower secondary vocational education	to be determined by the bank
85313	Practical education	to be determined by the bank
85314	Comprehensive secondary education schools	to be determined by the bank
85321	Secondary vocational education	to be determined by the bank
85322	Adult education	yes
85323	Secondary vocational education and adult education combined	to be determined by the bank
8541	Higher professional education	to be determined by the bank
8542	University education	to be determined by the bank
85511	Sailing and surfing instruction	yes

SBI code	Description	Eligible
85519	Other sports and recreation education	yes
85521	Dancing schools	yes
85522	Artistic education for amateurs (no dancing schools)	yes
8553	Driving schools	yes
85591	Distance education	yes
85592	Business education and training	yes
85599	Tutoring and education	yes
8560	Educational support activities	yes
86101	University hospitals	no
86925	Ambulance transport and related emergency centres	to be determined by the bank
86929	Umbrella organisations in the field of health care and other support activities for health care	to be determined by the bank
8710	Residential nursing care	to be determined by the bank
87302	Residential care for the elderly	to be determined by the bank
90041	Theatres	to be determined by the bank
91011	Public libraries	to be determined by the bank
91021	Museums	to be determined by the bank
9103	Preservation of historical buildings	to be determined by the bank
9900	Extraterritorial organisations and bodies	yes

Appendix 6 Reliable "golden triangle" combinations

Natural persons

Bank relation number	First name(s) as registered in identity document	Date of birth
Citizen Service Number (BSN)	First name(s) as registered in identity document	Date of birth
Tax identification number (including issuing country)	First name(s) as registered in identity document	Date of birth
Bank relation number	Surname as registered in identity document	Date of birth
Citizen Service Number (BSN)	Surname as registered in identity document	Date of birth
Tax identification number (including issuing country)	Surname as registered in identity document	Date of birth

Non-natural persons without legal personality (partnerships)[29]

Bank relation number	Registered name	Place of registered office
CoC number	Registered name	Place of registered office
Legal Entities and Partnerships Identification Number (*RSIN*)	Registered name	Place of registered office
Foreign CoC number (including issuing country)	Registered name	Place of registered office
Tax identification number (including issuing country)	Registered name	Place of registered office

Non-natural persons with legal personality (legal entities)

Bank relation number	Legally registered name	Registered office (including country of registration)
Dutch CoC number	Legally registered name	Registered office (including country of registration)
Legal Entities and Partnerships Identification Number (*RSIN*)	Legally registered name	Registered office (including country of registration)
Foreign CoC number (including issuing country)	Legally registered name	Registered office (including country of registration)
Tax identification number (including issuing country)	Legally registered name	Registered office (including country of registration)

Please note: if a bank uses bank relation numbers to create single customer views, the bank must ensure and be able to demonstrate that these unique customer numbers are used across all of its record-keeping systems. This method cannot be used until DNB has given its consent. In that case the bank relation number must also be used for all depositors in the submission in order to compile the single customer views. For example, it would not be permissible to compile the single customer view on the basis of the BSN for 60% of depositors and on the basis of the bank's customer number for the remaining 40%.

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29 Only in exceptional cases. See Section 2.2 for further information.

Appendix 7 Examples of when an SCV's reliability is not guaranteed

For each depositor, a combination of identifying details ("golden triangle") must be included in the SCV file (see Appendix 6) to enable a customer's identity to be established with sufficient certainty for SCV purposes.

The examples below are situations in which the customer's identity cannot be established with certainty. The single customer view in question must then be marked as "betrouwbaarheid niet gegarandeerd" (reliability not guaranteed) in the "Reliability indicator" field. Whether or not to assign this value is decided in two steps:
■ Step 1: check that the "golden triangle" is complete: are any details missing from the "golden triangle"?
■ Step 2: "deduplication": check to ensure that the same identification number combined with issuing country[30] or bank's customer number[31] included in the "golden triangle" used by the bank does not occur twice in the SCV file (i.e. the same number/country code combination in two or more SCVs).

In the "Reliable SCV" column in the examples below:
■ Yes = "betrouwbaar" (reliable)
■ No = "betrouwbaarheid niet gegarandeerd" (reliability not guaranteed)

In the examples below, the value NO is entered in the column "Reliable SCV" in step 1 because those SCVs have not yet been deduplicated and are therefore by definition unreliable. For the other SCVs, this will only become evident in Step 2.

Step 1 – Check that "golden triangle" is complete (correct identification)

Example 1
In the following situation, the date of birth is missing from SCV-05.

Party identifier	Bank relation number	BSN	Date of birth	Birth name	Reliable SCV
SCV-04		477216912	01-02-1950	Peeters	
SCV-05		477216912	-	Peeters	No
SCV-06		477216912	02-02-1950	Peeters	

We disregard the difference in date of birth between SCV-04 and SCV-06, since this is not checked until Step 2.

Example 2
In the following situation, the date of birth is missing from SCV-08.

Party identifier	Bank relation number	BSN	Date of birth	Birth name	Reliable SCV
SCV-07		531648990	29-05-1974	Jansen	
SCV-08		531648990	-	Jansen	No

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30 Citizen Service Number (BSN), foreign national identification number or foreign tax identification number.
31 If SCVs are created (deduplication and matching) on the basis of unique customer numbers.

Example 3

In the following situation, the surname is missing from SCV-13.

Party identifier	Bank relation number	TIN	Date of birth	Birth name	Reliable SCV
SCV-12		BE / 82.01.22.084.27	25-04-1987	Klaassen	
SCV-13		BE / 82.01.22.084.27	27-04-1987	-	No
SCV-14		BE / 82.01.22.084.27	26-04-1987	Klaassen	

Step 2 – Check that identification or customer number does not occur twice (correct deduplication)

All SCVs are checked for duplicate identification or customer numbers. If **two or more SCVs have the same identification or bank relation number**, those SCVs must be marked as "betrouwbaarheid niet gegarandeerd" (reliability not guaranteed) in the attribute "Reliability indicator". Some examples of this situation are given below. *These examples are non-exhaustive.*

Example 1

In the following situation, the bank relation number is not unique. Several "customers" with the same customer number have different dates of birth or surnames. All of those SCVs must then be marked as "betrouwbaarheid niet gegarandeerd" (reliability not guaranteed) in the attribute "Reliability indicator".

Party identifier	Bank relation number	CoC / BSN	Date of birth	Birth name / Registered name	Reliable SCV
SCV-01	BNKT-04583	CoC 12313229	-	Pieters Bike Shop	No
SCV-02	BNKT-04583	BSN 670885514	02-02-1950	Peeters	No
SCV-03	BNKT-04583	BSN 670885541	02-02-1950	Peeters	No

Example 2

Let us return to the situation in Example 1, Step 1. After Step 1, there are two SCVs left. These must also be marked as "betrouwbaarheid niet gegarandeerd" (reliability not guaranteed) because they both have the same BSN.

Party identifier	Bank relation number	BSN	Date of birth	Birth name	Reliable SCV
SCV-04		477216912	01-02-1950	Peeters	No
SCV-06		477216912	02-02-1950	Peeters	No

Example 3

In the following situations (Examples 3 and 4), there are two SCVs whose "golden triangle" of identifying information appears to be correct. In both examples the SCVs have the same BSN, so they presumably are the same customer. Nevertheless, two separate SCVs have been created for this customer, thus creating the risk that they will receive excessive compensation. These SCVs must therefore also be marked as "betrouwbaarheid niet gegarandeerd" (reliability not guaranteed).

Party identifier	Bank relation number	BSN	Date of birth	Birth name	Reliable SCV
SCV-08		679195208	21-08-1947	Poel	No
SCV-09		679195208	21-08-1947	Poel	No

Example 4

Party identifier	Bank relation number	BSN	Date of birth	Birth name	Reliable SCV
SCV-10		371705678	29-05-1974	Janssen	No
SCV-11		371705678	29-05-1974	Jansen	No

Example 5

Let us now return to the situation in Example 3, Step 1.
In the following cases (Examples 5, 6, and 7), there are a number of SCVs whose "golden triangle" appears to be correct. However, they have the same TIN (Example 5), CoC number (Example 6) or foreign CoC number (Example 7). These SCVs must therefore also be marked as "betrouwbaarheid niet gegarandeerd" (reliability not guaranteed).

Party identifier	Bank relation number	TIN	Date of birth	Birth name	Reliable SCV
SCV-12		BE / 82.01.22.084.27	25-04-1987	Klaassen	No
SCV-14		BE / 82.01.22.084.27	26-04-1987	Klaassen	No

Example 6

Party identifier	Bank relation number	CoC	Registered place	Registered name	Reliable SCV
SCV-15		51821915	Amsterdam	Trading Company 't IJ	No
SCV-16		51821915	Amsterdam	Trading Company Het IJ	No
SCV-17		51821915	Amsterdam	Trading Company IJ	No

Example 7

Party identifier	Bank relation number	Foreign CoC	Registered place	Registered name	Reliable SCV
SCV-18		BE / 87654321	Brussels	Flemish eatery	No
SCV-19		BE / 87654321	Antwerp	Flemish eatery	No
SCV-20		BE / 87654321	Bruges	Flemish eatery	No

Appendix 8 Data model situation examples

This appendix gives a number of examples of frequently occurring situations and how these are reflected in the conceptual data model (see the simplified data model in Illustration 4 in Section 2.4).

Example 1 – Underage depositors

J. Mulder is an underage depositor with multiple accounts. In the bank's records his father's name is linked to some of these accounts as his representative and his mother is his representative for the other accounts. This is not relevant in itself for DGS representation purposes (even when the child's representatives are directly linked to individual accounts in the bank's records) because both parents are automatically his representatives for all his assets (until the age of 18). The balance in the account will be paid, up to a maximum of EUR 100,000, to J. Mulder.

Bank

Representative

P. Mulder (father)
BSN 118130481

party identifier 002,
role = representative

Depositor

J. Mulder
15 years
BSN 693308953

party identifier 001,
role = depositor

Representative

S. Mulder-Slot (mother)
BSN 616564764

party identifier 003,
role = representative

Bank account ID 001

depositor 001
is entitled to 100%
via representative 002
and/or representative 003

Bank account ID 002

depositor 001
is entitled to 100%
via representative 002
and/or representative 003

Bank account ID 003

depositor 001
is entitled to 100%
via representative 002
and/or representative 003

Example 2 – Joint account

A joint account, one of whose holders also has a private account with the failed bank. In this example, the balance in the joint account is divided equally between the account holders.

The balance in the account will be paid, subject to a maximum of EUR 100,000 per depositor.

Bank

Depositor

G.J. Jansen
BSN 306934243

party identifier 004,
role = depositor

Depositor

P. Jansen-Pietersen
BSN 677920878

party identifier 005,
role = depositor

Bank account ID 004

private account
G.J. Jansen

depositor 004
entitlement 100%

Bank account ID 005

joint account
G.J. Jansen and/or
P. Jansen-Pietersen

depositor 004
entitlement 50%

depositor 005
entitlement 50%
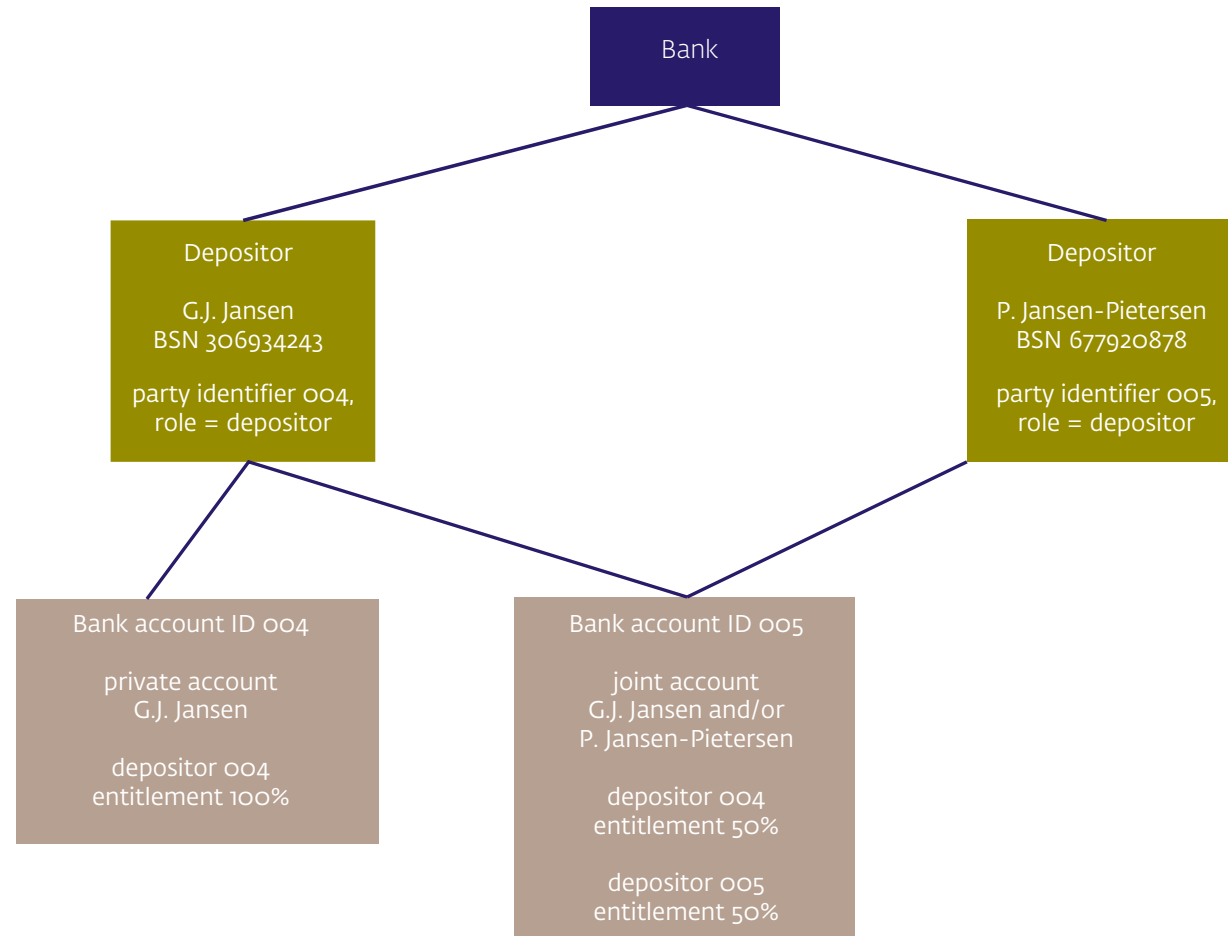
Example 3 – Representative

H. Smit is a guardian and legal representative of ten different depositors who between them have a total of eleven accounts. He also has an account of his own with the failed bank. The balances in the accounts will be paid out, subject to a maximum of EUR 100,000 per depositor.

Please note: in accordance with the formal logical data model, H. Smit has both the role of depositor and the role of representative.

Representative

H. Smit
BSN 631296141

party identifier 006,
role = representative

Depositor

H. Smit
BSN 631296141

party identifier 006,
role = depositor

Bank account ID 006

private account
H. Smit

depositor 006
entitlement 100%

Depositor
BSN 138858032
party identifier 007,
role = depositor

Bank account ID 007

Depositor
BSN 168211683
party identifier 008,
role = depositor

Bank account ID 008

Depositor
BSN 43098580
party identifier 009,
role = depositor

Bank account ID 009

Bank account ID 010

Depositor
BSN 592005483
party identifier 010,
role = depositor

Depositor
BSN 282961057
party identifier 011,
role = depositor

Bank account ID 011

Depositor
BSN 676044529
party identifier 012,
role = depositor

Bank account ID 012

Depositor
BSN 15657187o
party identifier 013,
role = depositor

Bank account ID 013

Depositor
BSN 689932728
party identifier 014,
role = depositor

Bank account ID 014

Bank account ID 015

Depositor
BSN 687079457
party identifier 015,
role = depositor

Bank account ID 016

Depositor
BSN 523738067
party identifier 016,
role = depositor

Bank account ID 017

Example 4 – private limited company (non-natural person with legal personality)

The depositor is a private limited company (*besloten vennootschap – BV*) with three accounts and two representatives. The aggregate balance in the company's accounts will be paid out, subject to a maximum of EUR 100,000. The remaining amount (EUR 408,678) will be left in the failed bank's estate. The company will have a claim against the bankrupt estate up to this amount.

Bank

Depositor

MoLeCo bv
CoC 18357898

party identifier 017,
role = depositor

Representative

G. Molenaar
BSN 345460236

party identifier 018,
role = representative

Representative

S. Leenders
BSN 205044189

party identifier 019,
role = representative

Bank account ID 018
EUR 108,762

depositor 017
is entitled to 100%
via representative 004
and/or representative 005

Bank account ID 019
EUR 24,823

depositor 017
is entitled to 100%
via representative 004
and/or representative 005

Bank account ID 020
EUR 375,093

depositor 017
is entitled to 100%
via representative 004
and/or representative 005

Example 5 – general partnership (non-natural person without legal personality) whose partners are all natural persons

This example shows how a non-natural person without legal personality, such as a general partnership (*vennootschap onder firma - VOF*), is to be dealt with. The general partnership has three partners (the depositors), all of whom have an equal share in the firm. The partnership has two accounts. Additionally, two partners also have a private account with the failed bank. The aggregate balance in the private account and partnership's account will be paid out, subject to a maximum of EUR 100,000 per depositor.

Example 5a shows the situation where the partners are registered as depositors in the bank's customer records. A separate SCV must be created for each partner and included in the SCV file. This is the standard method for dealing with this type of depositor.

Bank

Depositor

J. Jansen
BSN 285148345

party identifier 020,
role = depositor

Depositor

A. de Vries
BSN 642306175

party identifier 021,
role = depositor

Depositor

P. Pietersen
BSN 415867800

party identifier 022,
role = depositor

Bank account ID 021

private account
J. Jansen

depositor 020
entitled to 100%

Bank account ID 022

V.O.F. De Kunst
CoC 53784198

depositor 020
entitled to 50%

depositor 022
entitled to 50%

depositor 021
no entitlement

Bank account ID 023

V.O.F. De Kunst
CoC 53784198

depositor 020
entitled to 33.33...%

depositor 021
entitled to 33.33...%

depositor 022
entitled to 33.33...%

Bank account ID 024

private account
P. Pietersen

depositor 022
entitled to 100%

The partnership may only be identified as the "depositor" in exceptional situations (see Section 2.2), in which case the accounts must be identified as escrow accounts (see Example 5b).

A. de Vries (the third partner in Example 5a), BSN 642306175, is known to the bank but not registered in a structured manner in its customer records. However, the identities of the three partners are available to the bank, including their individual share interest in the partnership.
SCVs have been created for the two other partners because they have private accounts at the same bank. However, these SCVs do not yet take account of the partnership's accounts.

Bank

Depositor
J. Jansen
BSN 285148345

party identifier 020,
role = depositor

Depositor
V.O.F. De Kunst
CoC 53784198

party identifier 021,
role = depositor

Depositor
P. Pietersen
BSN 415867800

party identifier 022,
role = depositor

Bank account ID 021

private account
J. Jansen

depositor 020
entitled to 100%

Bank account ID 022

escrow account
V.O.F. De Kunst

depositor 021
NO ENTITLEMENT
to third-party funds

Partners' entitlement
available at bank

Bank account ID 023

escrow account
V.O.F. De Kunst

depositor 021
NO ENTITLEMENT
to third-party funds

Partners' entitlement
available at bank

Bank account ID 024

private account
P. Pietersen

depositor 022
entitled to 100%

Example 6 – general partnership (non-natural person without legal personality), one of whose partners is a non-natural person

Partnership account with two partners, one of whom has a private account at the failed bank, and in which the second partner is a non-natural person with legal personality (in the example a BV) and is hence represented.

In this example, the partners are registered as depositors in the bank's systems.

The balance in the account will be paid out, subject to a maximum of EUR 100,000 per depositor.

Bank

Depositor

E. Bakker
BSN 61295670

party identifier 023,
role = depositor

Depositor

MoLeCo B.V.
BSN 18357898

party identifier 024,
role = depositor

Representative

G. Molenaar
BSN 345460236

party identifier 025,
role = representative

Representative

S. Leenderse
BSN 205044189

party identifier 026,
role = representative

Bank account ID 025

private account
E. Bakker

depositor 023
entitled to 100%

Bank account ID 026

V.O.F. Dikkertje Dap
CoC 57384819

depositor 023
entitled to 50%

depositor 024
entitled to 50% via
representative 025 and/or
representative 026

Example 7 – Firm of notaries with a business account and an escrow account

Notariskantoor De Vries BV has a business account and an escrow account. The escrow account must be submitted as if it were an account of the firm, but will need to be marked as "escrow account held for client". DNB will separate this account, with the notary – as the account's operator – being requested to transfer the beneficiary records to DNB to determine the depositors and payouts. The balance in the notary's business current account will be paid out, subject to a maximum of EUR 100,000.

Bank

Depositor

Notariskantoor
De Vries B.V.
CoC 642306175

party identifier 027,
role = depositor

Representative

M. de Vries
BSN 11828251

party identifier 028,
role = representative

Bank account ID 027

payment account

depositor 027
entitled to 100%
via representative 028

Bank account ID 028

escrow account

depositor 027
NO ENTITLEMENT
to third-party funds!
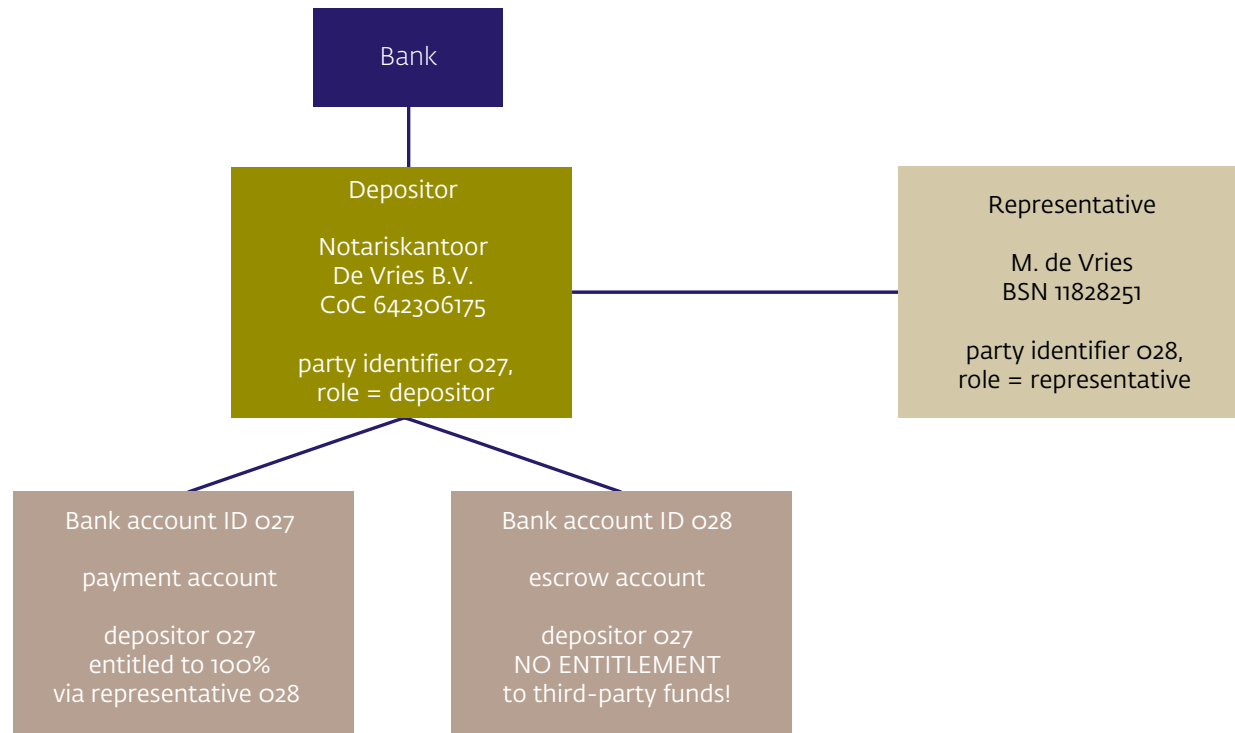
Appendix 9 DGS reports

Reporting form A – Liabilities eligible for deposit guarantee scheme (DGS) – individual
The figure below shows the form to be used by banks to report their deposit base, with banking groups being broken down by banking licence. This report contains:

■ the number of deposits;
■ associated balances in euros with interest accrued but not yet credited;
■ and the total amount in covered deposits (deposit base) per bank holding a banking licence.

A

Liabilities eligible for deposit guarantee scheme (DGS) – individual

	Number of accounts (in units) [8]			Amounts in thousands of euros					
	01	02	03	04	05	06	07	08	09
	Number of accounts at Dutch branches	Number of accounts at EEA branches	Total number of accounts	Through the Netherlands	Through EEA branches	Total through the Netherlands and EEA branches (04+05)	Foreign subsidiaries and non-EEA branches	Total (06+07)	Covered deposits as shown in bank's records [9]
001 Deposits (other than from credit institutions) [1]								V	
002 of which through the Netherlands and EEA branches, respectively [2]	V	V	B	V	V	B			V
Creditors by legal status									
003 - Public authorities	V	V	B	V	V	B			V
004 - Other financial undertakings [3]	V	V	B	V	V	B			V
005 - Corporate clients other than financial undertakings	V	V	B	V	V	B			V
006 - Retail customers	V	V	B	V	V	B			V
007 Total of lines 003 to 006 (equal to line 001a column 08)	B	B	B	B	B	B		V	B
008 of which bank savings deposits for private residential property [4]	V	V	B	V	V	B			
010 Total eligible for DGS as shown in this statement (005+006-008)	B	B	B	B	B	B			
Total eligible for DGS by account balance (010) and type of account [5]									
017 of which ≤ EUR 100,000	V	V	B	V	V	B			
018 EUR 100,000 - EUR 200,000 (accounts with one beneficiary)	V	V	B	V	V	B			
019 EUR 100,000 - EUR 200,000 (joint accounts and other accounts) [6]	V	V	B	V	V	B			
020 ≥ EUR 200,000 (accounts with one beneficiary)	V	V	B	V	V	B			
021 ≥ EUR 200,000 (joint accounts and other accounts)	V	V	B	V	V	B			
022 Total of lines 017 up to and including 021 [7]	B	B	B	B	B	B			
100 Total amount in covered deposits based on number of deposits and account balances [10]						B			
200 Deposits (other than from credit institutions) according to FINREP [11]								V	

Reporting form B – Liabilities eligible for deposit guarantee scheme (DGS) – consolidated

The figure below shows the form to be used by banks to report their deposit base at consolidated level. This report contains:

- the number of deposits;
- associated balances in euros with interest accrued but not yet credited;
- and the total amount in covered deposits (deposit base).

B

Liabilities eligible for deposit guarantee scheme (DGS) – consolidated

		Number of accounts (in units) [8]			Amounts in thousands of euros					
		01	02	03	04	05	06	07	08	09
		Number of accounts at Dutch branches	Number of accounts at EEA branches	Total number of accounts	Through the Netherlands	Through EEA branches	Total through the Netherlands and EEA branches (04+05)	Foreign subsidiaries and non-EEA branches	Total (06+07)	Covered deposits as shown in bank's records [9]
001	Deposits (other than from credit institutions) [1]								V	
002	of which through Dutch branches and EEA branches, respectively [2]	V	V	B	V	V	B			V
	Creditors by legal status									
003	- Public authorities	V	V	B	V	V	B			V
004	- Other financial undertakings [3]	V	V	B	V	V	B			V
005	- Corporate clients other than financial undertakings	V	V	B	V	V	B			V
006	- Retail customers	V	V	B	V	V	B			V
007	Total of lines 003 to 006	B	B	B	B	B	B		V	B
008	of which bank savings deposits for private residential property [4]	V	V	B	V	V	B			
010	Total eligible for DGS as shown in this statement (005+006-008)	B	B	B	B	B	B			
	Total eligible for DGS by account balance (010) and type of account [5]									
017	of which ≤ EUR 100,000	V	V	B	V	V	B			
018	EUR 100,000 - EUR 200,000 (accounts with one beneficiary)	V	V	B	V	V	B			
019	EUR 100,000 - EUR 200,000 (joint accounts and other accounts) [6]	V	V	B	V	V	B			
020	≥ EUR 200,000 (accounts with one beneficiary)	V	V	B	V	V	B			
021	≥ EUR 200,000 (joint accounts and other accounts)	V	V	B	V	V	B			
022	Total of lines 017 to 021 [7]	B	B	B	B	B	B			
100	Total amount in covered deposits based on number of deposits and account balances [10]						B			
200	Deposits (other than from credit institutions) according to FINREP [11]									V

Notes to reporting forms A and B

General guiding principles:
- These reports provide a list of deposits as defined in Section 1:1, Part 1.1.1. of the Wft, regardless of whether and, if so, to what extent the liabilities and/or customers are eligible for the DGS and are covered once the DGS has been activated.
- Deposits held at the central bank, interbank deposits and deposits held through foreign-based subsidiaries or non-EEA-based branches must not be included in the list (column 07 must not be completed).
- Account balances denominated in currencies other than euro must be converted at the reference rates published by the ECB on the final day of the reporting period. A bank can also perform this calculation using exchange rates published by price information providers.
- All fields marked (v) must be completed ("v" meaning "mandatory"). The fields marked with a (b) are calculated.

1. The basis is the total amount of deposits (excluding deposits of credit institutions) as defined in the DGSD. If this amount differs from the liabilities in FINREP (line 200), the reporter may provide a quantitative explanation of the difference between line 001 and line 200 at the request of DNB. The basis comprises the following liabilities in table 08.01.a. in FINREP: line 050 -/- 060 -/- 160 (for columns 010 + 020 + 030).

2. Liabilities (number and balances) assumed through Netherlands-based branches/offices (columns 01 and 04), including through the provision of cross-border services, and liabilities assumed through branches located in an EEA country (columns 02 and 05).
3. Other financial undertakings are financial undertakings as referred to in Section 1:1 of the *Wft* other than credit institutions.
4. These are bank savings deposits relating to private residential property, in so far as these are set off against a home loan pursuant to Section 3:265d of the *Wft*. Pursuant to Section 29.01(2)(e) of the Decree on Special Prudential Measures, Investor Compensation and Deposit Guarantees, these deposits are not covered by the deposit guarantee scheme.
5. Account balances must be entered on one line only. For example: if an account holds EUR 110,000, an amount of 110 must be reported on line 018 or 019, rather than 100 on line 017 and 10 on line 018 or 019.
6. "Other accounts" refers to all other accounts that have more than one beneficiary.
7. The amounts shown on lines 010 and 022 must be identical and comprise both business and retail customers.
8. The number of accounts (in units) held with Netherlands-based offices/ branches must be reported in column 01 and the number of accounts (in units) held with EEA-based branches in column 02, with the related balances being reported in columns 04 and 05. If an individual account holder holds multiple accounts, the number of accounts per account holder or the balances on those accounts must not be aggregated.
For example: an account holder has three accounts with a balance of EUR 30,000, EUR 60,000 and EUR 120,000, respectively. On line 017, up to EUR 100,000, you must enter the account with EUR 30,000 and the account with EUR 60,000, and enter the number of accounts, i.e. 2, on the same line in column 01 or 02. The account with EUR 120,000 must be reported on the line for balances > EUR 100,000, with the number of accounts, i.e. 1, being entered in column 01 or 02.
9. This involves aggregating the covered amounts per depositor, as shown in the single customer view.
10. This is an estimate of the total amount in covered deposits on the basis of the number of deposits and balances, without taking account of depositors that have more than one account.
11. Liabilities from Table 08.01.a. in FINREP: lines 050 -/- 060 -/- 160 (for columns 010 + 020 + 030).

Reporting form C – Appendix with list of accounts and balances by EEA branch

The figure below shows the appendix to be submitted along with the annual DGS report, broken down by banking licence holder and EEA branch.

C — Liabilities eligible for deposit guarantee scheme (DGS)		Number of accounts (in units) [2]					Amounts in thousands of euros				
		01	02	03	04	05	06	07	08	09	10
		Number of accounts at EEA branch in country A Name of country Name of branch	Number of accounts at EEA branch in country B Name of country Name of branch	Number of accounts at EEA branch in country C Name of country Name of branch	Number of accounts at EEA branch in country Z Name of country Name of branch	Total number of accounts at EEA branches	EEA branch in country A	EEA branch in country B	EEA branch in country C	EEA branch in country Z	Total at EEA branches
	Creditors by legal status										
005	- Corporate clients other than financial undertakings	V	V	V	V	B	V	V	V	V	B
006	- Retail customers	V	V	V	V	B	V	V	V	V	B
007	Total eligible for DGS as shown in this statement (005+006)	B	B	B	B	B	B	B	B	B	B
	By account balance and type of account										
017	of which ≤ EUR 100,000	V	V	V	V	B	V	V	V	V	B
018	EUR 100,000 - EUR 200,000 (accounts with one beneficiary)	V	V	V	V	B	V	V	V	V	B
019	EUR 100,000 - EUR 200,000 (joint accounts and other accounts) [5]	V	V	V	V	B	V	V	V	V	B
020	≥ EUR 200,000 (accounts with one beneficiary)	V	V	V	V	B	V	V	V	V	B
021	≥ EUR 200,000 (joint accounts and other accounts)	V	V	V	V	B	V	V	V	V	B
022	Total of lines 017 up to and including 021 [1]	B	B	B	B	B	B	B	B	B	B

Notes to reporting form C

Guiding principles:

- This report provides a list of a bank's deposits eligible for the DGS held with a branch located in an EEA Member State.
- Any balances denominated in currencies other than the euro must be converted at the reference rates published by the ECB or price information providers on the final day of the reporting period.
- All fields marked (v) must be completed ("v" meaning "mandatory"). The blue fields are calculated (b).
- The guiding principles for supplying the number of accounts and balances on lines 005 – 006 and lines 017 – 021 are the same as those for reporting forms A and B.
- The totals shown in column 05 must tally with the number of accounts shown in column 02 in form A.
- The total balances shown in column 10 must tally with the balances shown in column 05 in form A.

Appendix 10 Audit objectives and controls for ISAE 3402 audit

This overview relates to the account of the external auditor's assessment of the SCV system in Section 4.3 of this manual and outlines the audit objectives and controls which, as a minimum, will be part of the external auditor's engagement and are expected to be covered in the external auditor's ISAE 3402 report.

#	Process	Control objective	Control and audit approach	Link to DNB article	Type of control
1.1	Recording of DGS-relevant data in source systems.	Guarantee of data quality when recording data in the source system relating to the (identification of) the depositor so that they are accurate and complete.	Customer acceptance and customer registration processes have been implemented across the product range not just for DGS customers and DGS products alone. The processes and controls ensure reliable recording of customer data at entry/amendment, taking into account various external requirements (DGS, but also, *inter alia*, MIFID, GDPR, CRS, FATCA) and internal requirements (Client Due Diligence - CDD - and Know Your Customer - KYC - etc.).	5.1, 6.2, 6.3, 6.4	Regular
1.2			Centrally organised data cleaning processes have been set up across the product range not just for DGS customers and DGS products alone. The data cleaning processes and controls ensure data quality monitoring and the recording of an issue/risk log with data quality findings.	5.1, 6.2, 6.3, 6.4	Regular
1.3		Guarantee of data quality with regard to the deposit balance to ensure that it is accurate and complete.	The monitoring and (daily) reconciliation of suspense accounts, including DGS-relevant suspense accounts, is part of the regular processes within the bank on both the operational side (day-to-day payments) and the financial administrative side. This is for more than just DGS customers and DGS products during "peacetime".	3.1	Regular
2.1	Data collection	Guaranteeing that the data set used to compile the SCV is fully consistent with the data in source systems.	Periodic check (at least once a quarter) to reconcile the details of collected data (including with regard to deposits, depositors or their identifying characteristics) with the data in the source data sets and thereby assess the accuracy and completeness of the interface jobs.	5.1, 6.1, 6.2, 6.3, 6.4	Specific

#	Process	Control objective	Control and audit approach	Link to DNB article	Type of control
3.1	Checking of data for completeness and accuracy	Ensuring accuracy and completeness of a data set for the production of the SCV file.	Periodic (at least quarterly) check of duplicates in depositors file based on golden triangle.	5.1, 6.2, 6.3, 6.4	Specific
3.2			Periodic (at least quarterly) check of public sanctions lists for accurate and complete registration of blockings.	6.1	Specific
3.3			Periodic (at least quarterly) check using other available external sources (such as tax administration feedback from BSN number disclosures).	various	Specific
3.4		Ensuring that the DNB-prescribed data model is completed in accordance with the requirements of the valid Data Delivery Agreement.	Periodic (at least quarterly) check that all fields in the prescribed data model have been completed in accordance with the requirements of the valid Data Delivery Agreement (including the applicable validation rules), with the following data being included for natural persons: 1. Initials, birth name, date of birth; 2. Address including country; 3. The national identification number or the tax identification number and issuing country, if natural persons have these; 4. Vital status.	2.2e	Specific
3.5			Periodic (at least quarterly) check that all fields in the prescribed data model have been completed in accordance with the requirements of the valid Data Delivery Agreement (including the applicable validation rules), with the following data being included for all non-natural persons: 1. Registered name; 2. Registered place of business including country; 3. Address including country; 4. If registered in the Netherlands, the CoC number or the RSIN; 5. If registered abroad, the tax identification number or the CoC number and the issuing country; 6. Indication of whether it is a non-natural person with legal personality or without legal personality.	2.2f	Specific
3.6			Periodic (at least quarterly) check that all fields in the prescribed data model have been completed in accordance with the requirements of the valid Data Delivery Agreement (including the applicable validation rules), with the following data being included for all representatives: a. A unique identifying key for each representative; b. Initials, birth name; c. Date of birth, if known; d. Address including country; e. National identification number or tax identification number and issuing country, if representatives have these; f. The type of authority conferred on the representative for each representation.	2.3	Specific

#	Process	Control objective	Control and audit approach	Link to DNB article	Type of control
3.7			Periodic (at least quarterly) check that all fields in the prescribed data model have been completed in accordance with the requirements of the valid Data Delivery Agreement (including the applicable validation rules), with the following data being included for deposits: a. A unique identifying key for each deposit; c. The account number known to the depositor; d. The name documented for the deposit; e. A product name or description of the deposit as known to the depositor; f. A categorisation of the type of deposit as referred to in Section 5(2); g. Markings as referred to in Section 5(3); h. Markings as referred to in Section 6(1)(b) to (g); i. Markings as referred to in Section 6(4); j. The currency in which the deposit is held; k. The balance of the deposit; l. The amount of interest accrued but not yet credited on the deposit; m. The country in which the deposit is held; n. The number of depositors of the deposit and, if there are more than one, the percentage of the claim of each depositor if it is not proportional.	2.4a, c, d, e, f, g, h I, j k, l m, n	Specific
3.8			Periodic (at least quarterly) check that all fields in the prescribed data model have been completed in accordance with the requirements of the valid Data Delivery Agreement (including the applicable validation rules), with the following data being included for deposits: a. Eligible deposits and depositors; b. Deposits arising from transactions where there has been a criminal conviction for money laundering, as referred to in Section 29.01(2) of the *Bbpm*; c. Deposits that are the subject of a legal dispute, as referred to in Article 8(5)(a) of the Deposit Guarantee Schemes Directive; d. Deposits that are subject to restrictive measures imposed by national governments or international bodies, as referred to in Article 8(5)(b) of the Deposit Guarantee Schemes Directive; e. Deposits over which a pledge has been created for a third party; f. Deposits that have been attached; g. Deposits that are blocked pursuant to the laws of the country where the deposit is held, to the extent that the blocking is relevant to a DGS pay-out; h. Bank savings deposits for a private residential property, as referred to in Section 29.01(2)(e) of the *Bbpm*.	6.1	Specific

#	Process	Control objective	Control and audit approach	Link to DNB article	Type of control
4.1	Determination of the amount in covered deposit balances and completion of the DNB quarterly report on DGS.	The aggregate eligible amount in euros of each depositor is calculated accurately and completely.	Check of the accuracy and completeness of the calculation of the aggregate eligible amount in euros of each depositor, taking into account accrued interest. The bank takes into account the exclusions specified in Sections 4.2 and 4.3 of the SCV Policy Rule and the accompanying notes.	4.1 4.2, 4.3	Specific
4.2		Reported amount in the quarterly DGS report is correct.	Check of the inclusion of the correct amounts in column 9 of the quarterly DNB report.		Specific
4.3		Relevant movements are included in a timely manner and in the correct period.	Process checks that suspense accounts for incoming payments are at zero and in-flight transactions have been credited before file creation. Possible check of running of end-of-day processes.	3.1, 3.2	Regular
5.1	Compilation of SCV file	The SCV file is compiled correctly and fully.	Check of whether query/functionality for generation of SCV file meets requirements of valid Data Delivery Agreement as published on DNB website.	2.1. t/m 2.4, 6.1 t/m 6.4	Specific
5.2			Process checks that working inventory of movements relating to depositor data has been eliminated (e.g. representatives/blocked accounts).	2.1. t/m 2.4, 6.1 t/m 6.4	Regular
5.3			Check of SCV file after generation to ascertain that all 23 csv files have been generated and completed. Possible check of error messages in log file (e.g. by use of checklist).	2.1. t/m 2.4, 6.1 t/m 6.4	Specific
5.4		The "eligible" and "covered" deposit amounts in the SCV file have been included correctly and fully.	Check of SCV file (e.g. based on sampling of each type of depositor) to ascertain the reliability of the SCV file before it is sent to DNB.	2.1. t/m 2.4, 6.1 t/m 6.4	Specific
5.5			Analysis of outstanding data quality issues and determination/processing of impact on SCV file. (IAD reports, complaints, DNB letters, incidents).	2.1. t/m 2.4, 6.1 t/m 6.4	Specific
5.6			Items which have been marked as unreliable in the SCV files are followed up (for example by corrections in source systems) and the follow-up is monitored.	2.1. t/m 2.4, 6.1 t/m 6.4	Specific
5.7			Checking of consistency with other reports including quarterly DGS report and FINREP (e.g. same source and one-time determination as baseline).	10.3	Specific
6.1	Delivery of SCV File	The SCV file can be delivered on time.	At least once a year, at the request of DNB, the bank runs the process for delivering the SCV file (in accordance with requirements in the SCV Policy Rule and the Data Delivery Agreement) within the specified delivery period (whole process chain from request through to DNB acceptance of delivery).	9.1, 9.2, 9.3, 9.4, 9.6	Specific
6.2			Monitoring the progress of execution of the SCV file creation process.		Specific
6.3			Establishing that during the execution of the annual delivery process Logius has issued a confirmation of receipt, DNB has accepted the delivery and the bank has received a validation report.	9.1, 9.2, 9.3, 9.4, 9.6	Specific

#	Process	Control objective	Control and audit approach	Link to DNB article	Type of control
7.1	Delivery of data for resolution of banks.	The delivery of data for the production of the resolution plan is authorised and periodically tested.	In its role as the resolution authority, DNB is responsible for drawing up the resolution plan. As the resolution authority DNB will inform the bank whether there are any impediments to the resolution of the bank. In that regard the requirements in Section 8 therefore depend on the formal request from DNB. The requirements in Section 7 apply to all banks. Section 7(1) concerns in practice the delivery of the Liability Data Report prescribed by the SRB that banks must supply for the drawing up of resolution plans. The marking in accordance with Section 7(2)(a) is part of the SCV file and therefore falls within the scope of the SCV file (including the bank processes to determine this marking). The data in Section 7(2)(b) fall outside the scope of the SCV file for DGS purposes (concerns deposits held through branches in third countries), but banks must be able to supply it for resolution purposes.	7.1 to 7.3 and 8	Specific, partly dependent on DNB instruction
8.1	General IT controls (specifically for IT environment for generation of SCV file)	Access to systems and data is limited to authorised users.	To ensure controlled operations the bank has subjected its systems to IT general controls. As part of the "three lines of defence" model within a bank, the internal audit department assesses compliance with these controls by the first and second line and issues a specific DGS report of findings each year as part of its audit programme. It makes this report available to the external auditor. The external auditor will test/assess this report of findings as part of its DGS audit. Within this control framework it will be demonstrated that adequately designed and sufficiently specific controls are in place. The internal auditor will assess this control plan.		Regular
8.2			Access to the IT environment through which a data set is filled and the SCV file is generated and sent to DNB is limited to authorised users (source systems are not part of it).		Specific
8.3		Controlled change management for systems and data.	Changes in the IT environment through which a data set is filled and the SCV file is generated and sent to DNB have been tested and authorised before being taken into production (source systems are not part of it).		Specific
8.4			The important interface (batch) jobs coordinated with functional management have operated according to the desired process in the IT environment through which a data set is filled from the source systems and the SCV file is generated and sent to DNB.		Specific
8.5		Check of outsourced services relating to SCV reporting	Effective monitoring to ensure that external service providers are performing their services in accordance with the agreements entered into with them that are relevant to the SCV reporting and that the controls outsourced to them for the SCV reporting are operating effectively. Note: the bank must provide evidence of contractual agreements with service providers guaranteeing that the services for the DGS will continue to the extent necessary in the event of bankruptcy.		Specific