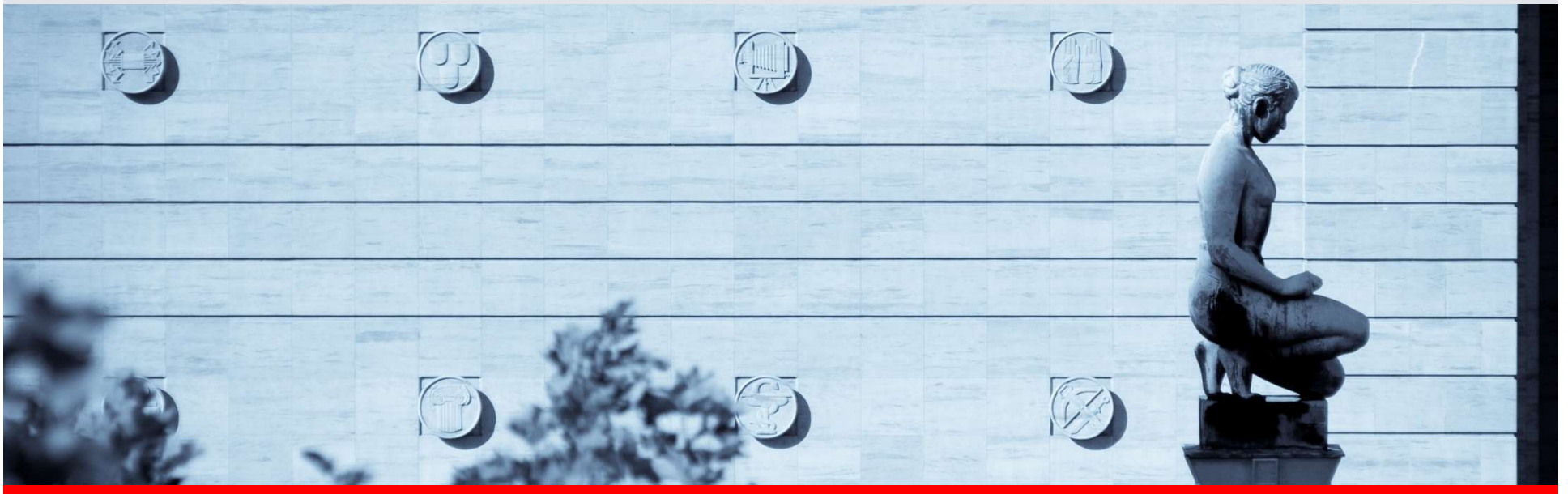


NBB-SSS Compliance activities

Brussels 04/03/2019 NBB-SSS User Committee



- ▶ SWIFT Customer Security Program: KYC-SA
- ▶ IT self-certification
- ▶ End-to-end business continuity plan



Know Your Customer Security Attestation (SWIFT)

- ▶ The KYC Registry meets the need for an efficient, shared platform for managing and exchanging standardised Know Your Customer (KYC) data. SWIFT defined a set of data and documentation that addresses KYC requirements across multiple jurisdictions.
- ▶ Annual attest before the expiry date of the current attestation and confirm full compliance with the mandatory security controls
- ▶ First time reported in 2018
- ▶ 60 participants (BIC8 based)



KYC-SA debrief

- ▶ Mailing to all NBB-SSS participants
- ▶ Non-responding participants were reminded (mail/phone)
- ▶ Need to grant access to NBB-SSS
- ▶ Access request pending:
 - SOGEFRPPHCM
 - GOSNGB2LXXX
 - GSILGB2XXXX
- ▶ Not applicable
 - DIERBE21XXX (internet based participant, not SWIFT based)

NBB-SSS	Granted	Access request pending	N/A	DENIED
60	55	3	2	0
100,00%	91,67%	5,00%	3,33%	0

- ▶ Next step:
 - NBB-SSS is contacting the non-compliant Participants through the KYC-SA contacts on SWIFT CSP website for more information on target dates compliance.



IT Self-certification

- ▶ From 2018 onwards yearly report
- ▶ First time executed for NBB-SSS to be compliant with T&C Art. 7.4.7
 - In the past only for TARGET2 “Critical Participants”, from 2018 onwards for all TARGET2 Participants
 - Similar exercise at TARGET2-BE
- ▶ to ensure the security and operational reliability of the participants’ infrastructures and their interfaces with the NBB-SSS and with the T2S platform.
- ▶ Compliance till level-1 requested
 - If not compliant remedial action point list requested with specified target deadline
 - No sanctions in place for not responding
- ▶ 71 participants (BIC11 based)



IT Self-certification

▶ Levels of non-compliance

- **Fully compliant**
- **Level 1:** no significant areas of non-compliance; reasonable assurance can be given that this does not have the potential to harm the smooth functioning of NBB-SSS / T2S and/or adversely affect other system participants.
- **Level 2:** significant areas of non-compliance; reasonable assurance cannot be given, and an exploitation of the vulnerabilities identified could harm the smooth functioning of NBB-SSS / T2S and/or adversely affect other system participants.
- **Level 3:** non-compliance; reasonable assurance cannot be given, and an exploitation of the vulnerabilities identified would significantly harm the smooth functioning of NBB-SSS / T2S and/or adversely affect other system participants



IT Self-certification debrief

- ▶ Mailing to all NBB-SSS participants
- ▶ Deadline postponed twice upon request participants (holidays, additional questions, first time)
- ▶ Non-responding participants were reminded (mail/phone)
- ▶ Non-compliant participants (Level 2 / Level 3):
 - Compliant by end 2018
 - MGTCBEBEECL
 - SICVFRPPXXX
 - Compliant by end Q1/2019
 - JVBABE22XXX
 - Compliant by end 2019
 - DEGRBEBBXXX
 - DEGR LULLXXX
 - ARSPBE22XXX
- ▶ 5 smaller participants have not replied so far

Participants	Fully compliant	Level-1 compliant	Level-2 compliant	Level-3 compliant	answered
71	26	34	6	0	66
	36,62%	47,89%	8,45%	0,00%	



Business continuity production test end-to-end (CSD-R)

- ▶ NBB-SSS User Committee validated the Business continuity requirements in its meeting on 3/9/2018
- ▶ These requirements includes end-to-end testing with Key participants as imposed by Art. 79 of the Regulatory Technical Standards (RTS) of the CSD Regulation
- ▶ The NBB-SSS User Committee deemed the yearly participation of operational Key participants in the business continuity exercise appropriate. The Key participants have been identified on the basis of their number of instructions, and the cash and nominal values therein
- ▶ 12 Participants



Debrief BCP end-to-end

- ▶ Mailing to inform participants
- ▶ Two exercises dates on voluntary base: 27/11/2018 – 13/12/2018
- ▶ exercise from 09h00 till 16h15

BCP end-to-end	27/11/2018	13/12/2018	Compliance 1-6	Issues reported	multiple operational locations
BBRUBEBB010	X		X	none	
BMTSBEBBXXX	DNR	DNR	DNR	DNR	DNR
CEDELULLXXX	DPP	DPP	X	DPP	
CITTGB2LXXX	DCP	DCP	X	none	DCP
DEUTNL2AXXX	X		X	none	X
GEBABEBB36A	X		X	none	
GKCCBEBBXXX	X		X	none	X
ISAEFRPPXXX		X	X	none	
KREDBEBBXXX		X	X	none	
LCHLGB2XXXX	X		X	none	
MGTCBEBECL		X	X	none	X
PARBFRPPXXX	X		X	none	

DCP: directly connected participant doesn't use the GUI

DPP: Did not participate

DNR: Did not respond

▶ Remarks :

- What with DCPs? directly connected and don't use RAMSES
- Possibility of homeworking and multiple business centers have an impact on BCP exercises.

