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FSMA\_2017\_24 of 29/12/2017

## Notification of Key Information Documents for PRIIPs to the FSMA via the “FinPro” application

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### **Scope:**

All manufacturers of packaged retail and insurance-based investment products and all those selling or advising on such products, as defined in Regulation (EU) No 1286/2014 of the European Parliament and of the Council of 26 November 2014 on key information documents for packaged retail and insurance-based investment products, and who are subject to the obligation to notify a key information document to the FSMA in accordance with Article 37sexies of the Law of 2 August 2002 on the supervision of the financial sector and on financial services.

### **Summary/Objectives:**

This document describes the procedure to be followed for the notification of key information documents for PRIIPs to the FSMA via the “FinPro” application.

### **Structure:**

1. Legal basis
2. Access to the “FinPro” application
3. Creating a login
4. Creating and using a group account
5. Creating products and the tree
6. Correcting and updating KIDs
7. Editing and deleting data, users and group accounts
8. Support

## 1. Legal basis

Regulation (EU) No 1286/2014 of the European Parliament and of the Council of 26 November 2014 on key information documents for packaged retail and insurance-based investment products establishes uniform rules on the format and contents of the key information document (hereafter “KID”) that must be drawn up by the manufacturers of packaged retail and insurance-based investment products (hereafter “PRIIPs”), and on the provision of the KID to retail investors in order to help them understand and compare the principal features of the PRIIP and the associated risks.

Pursuant to Article 5, paragraph 2 of the said Regulation, all Member States may require the ex ante notification of the KID by the PRIIP manufacturer or the person selling a PRIIP to the competent authority for PRIIPs marketed in that Member State.

Article 37sexies, § 2, first paragraph of the Law of 2 August 2002 on the supervision of the financial sector and on financial services imposes this obligation of prior notification on the manufacturers or vendors of a PRIIP in cases where the product is marketed in Belgium.

The aforementioned Article 37sexies, § 2, first paragraph also provides that the King may, upon the advice of the FSMA, lay down rules aimed at specifying those to whom the obligation to make the notification applies where the obligation to notify the KID could apply to several persons, as well as setting out the deadline and the procedures according to which this notification must be made.

The Royal Decree of 25 December 2017, implementing Article 37sexies of the Law of 2 August 2002, specifies the obligation of prior notification of the KID to the FSMA, stipulating that the notification to the FSMA is to be made electronically according to the procedures established by the FSMA.

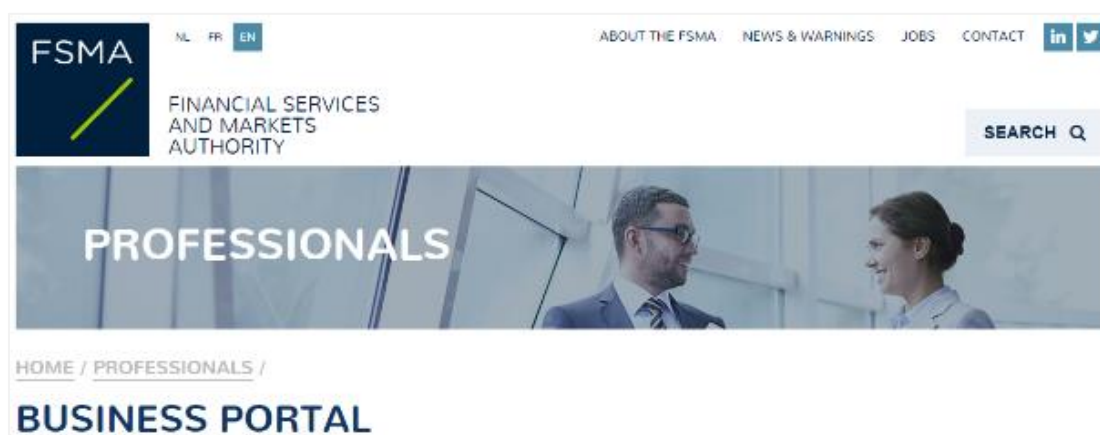
The “FinPro” application, the instructions for which are provided in the following sections, facilitates the notification of KIDs to the FSMA.

The manufacturer or vendor of a PRIIP has the option of either notifying the KID to the FSMA via the “FinPro” application or sending it to the FSMA by email to the address [kidnotification@fsma.be](mailto:kidnotification@fsma.be).

The FSMA asks, however, preferably to use the “FinPro” application.

## 2. Access to the “FinPro” application

To access the “FinPro” application, please go to the FSMA's business portal (<https://www.fsma.be/en/business-portal>) and click “FinPro”.



The application is available in French, Dutch and English.

### 3. Creating a login

A login must be created to allow the user to identify him/herself within the application. To create a login, the only prerequisite is to have an email address.

The application's home page allows you either to login if you already have a login and password, or to create a new login ("**Request a new login**").

I'm a new user \_\_\_\_\_  
[Request a new login](#)

#### To create a new login:

Step 1: Click "**Request a new login**" on the home page.

Step 2: Fill in the requested information (the password must contain at least 6 characters), and click "**Send**".

Step 3: An email message has been sent to the address you entered on the form. Please open the email and click the link to confirm your email address.

Step 4: A screen will appear, asking you to enter your password again. Enter your password and click "**Finalize login**".


### 4. Creating and using a group account

The group account makes it possible to share the information contained in the application among a group of users. If just one user needs to have access to the application, that user will also have to create a group account.

Initial connection and creation of a group account:

When you connect to the application for the first time (after having created your login), you will be asked to create a group account that should correspond to a type of product (either “Insurance-based investment product” or “Packaged retail investment product”). The operating hypothesis is that a group of colleagues who need to share information on the notification of KIDs is set up for a given type of product. The data structure used to notify a KID differs depending on the type of product. As a result, a KID about a packaged retail investment product cannot be notified via a group account of the “Insurance-based investment product” type and vice versa. You are then asked to enter a description of the group account, in order to help you manage several group accounts should you wish to set up more than one. You will be asked to enter an email address. This is optional. If you do enter one, the emails confirming the notification of a KID will be sent to that address (as well as to the address of the person who notified the KID and to all other users in the group). We suggest that you use an address that is shared among the users of the group account.

### CHOOSE GROUP ACCOUNT

 At this step, you are requested to create a group account.

All KIDs notifications done within a group account will be visible by all users of this group account.

Please [click here](#) to access the communication which will give you further guidance on this topic or click on "Add group account" to go to the next step.

[ADD GROUP ACCOUNT](#)

## CREATE A NEW GROUP ACCOUNT

Choose the type of PRIIP of this group account.

Insurance-based investment product

Packaged retail investment product

**i** If you need to manage insurance-based investment products and packaged retail investment products, please create a group account for each type of PRIIP.

In order to be able to manage large volumes of KIDs from different manufacturers, you can create a group account for each manufacturer.

Once you create a group account, you can not delete it later anymore.

Description (max 50 characters)

Email

This email address is optional. If you fill in an email address, emails for KID notification confirmations will be sent to this address (as well as to the email address of the user who notified the KID and to all other users of this group account). We suggest you use an address that is shared amongst the users that use this group account.

### Add new users:

The user who created (or who belongs to) the group account can later add other users (if needed) to this group account by clicking **“Add a new user”** on the **“Choose group account”** screen, so as to ensure that the information entered at the group account level is shared across all the users who have been added. The **“Choose group account”** screen is accessible at all times by clicking the **“Manage group account”** button in the upper right corner of the screen. A new user can be added by entering that person's email address.

### Managing the group account:

The **“Choose group account”** screen, accessible at all times by clicking the **“Manage group account”** button in the upper right hand corner, makes it possible to i) create a new group account, ii) edit a group account iii) add users to a group account iv) switch from one group account to another for the notification of KIDs.

**Creating a new group account:** When a new group account is created, you are asked to fill in the same information as when you created the first group account.

**Editing a group account:** The description of a group account and the email address linked to that group account (used to send emails confirming the notification of KIDs) can be edited at any time. However, the type of product linked to a group account can no longer be edited.

*Adding new users:* There is no restriction on i) the number of people who can be added to a group account, ii) the profile of the person to be added (people working for a separate company can be added to the group account). A person who does not have a login yet can also be added to the group account. A user who has been added receives the same rights as the person who created the group account, and can in turn add new users. New users can be added at any time.

*Selecting the group account:* The “**Choose group account**” screen allows you to select the group account for which a KID has to be notified.

CHOOSE GROUP ACCOUNT				
<b>ADD GROUP ACCOUNT</b>				
INS_00006(No description)	Insurance-based investment product	<b>SELECT</b>	ADD A NEW USER	EDIT

*General principles:*

The number of group accounts is left to your discretion. A user can create or belong to several group accounts.

There is no access restriction within a group account: all the information you enter into the application via the group account will be visible (and can be edited, if necessary) to all members of that group account.

Once a group account has been created, it cannot be deleted.

The application does not make it possible to see which users were added to a group account.

It is not possible to delete a user from a group account.

*Request to add a user to a group account*

Where a user requests that another person be added to a group account, there are two possible scenarios:

- a. The person whose addition is being requested already has a login for the “FinPro” application: An email will be sent to the person whose addition is being requested to inform him or her of the addition of the group account to his or her profile. A copy of this email will also be sent to the person requesting the addition. The information for this group account is now accessible to the user whose addition is being requested.
- b. The person whose addition is being requested does not yet have a login for the “FinPro” application: An email containing a link redirecting him or her to the page for creating a login will be sent to the person whose addition is being requested. A copy of this email will also be sent to the person requesting the addition. The person whose addition is being requested, after having followed the steps to create a login, will have access to the group account to which he or she has been added, without being asked to create a group account.

**Best practice:**

**BE CAREFUL:** Although there are no restrictions on creating group accounts, it is best to avoid creating too many group accounts, which would mean that the KID notifications would be spread across many group accounts and hence accessible (potentially) by different users, thus rendering their management more time-consuming.

It is advisable, therefore, not to create new group accounts unless necessary for organizational purposes. For example, a group account may be created for each product manufacturer in order to avoid, where applicable, too many products being included in the same group account. Another case that may justify the creation of several group accounts would be one where a manufacturer or issuer wishes to share information with external entities (such as law firms) for only some of its products.

One should also avoid each user who is to belong to a group account creating his or her own login within the application without having received a request to be added to a group account. This would create a situation where every user would have his or her own group account, since at the time of the first login, the user is asked to create a group account. These different group accounts, created by each user, would be rendered useless. Therefore it is recommended that one person in a group of users should take the role of centraliser, should create his or her login and the group account, and then systematically invite all the other users who are to belong to that group account (meaning that these other users will “wait” to receive a request to be added to a group account before creating their own login within the application).

## 5. Creating products and the tree

Prior to the notification of a KID, the user needs to enter and save certain basic information about the product to which the KID relates. Depending on whether it is a packaged retail investment product or an insurance-based investment product, the structure and the content of the data will differ.

### a. Packaged retail investment products

Step 1: The user selects a group account of the “Packaged retail investment product” type.

**CHOOSE GROUP ACCOUNT**

**ADD GROUP ACCOUNT**

INS_00006 (No description)	Insurance-based investment product	<b>SELECT</b>	ADD A NEW USER	EDIT
INV_00002 (No description)	Packaged retail investment product	<b>SELECT</b>	ADD A NEW USER	EDIT

Step 2: A screen appears, showing on the left the name of the group account and, where applicable (if products have already been created), the product tree, and on the right the different options offered to the user depending on the place where he or she is situated in that tree. At this stage, the user is positioned at the top of the (name of group account) tree and clicks “**Add new PRIP (and notify KID)**”.

CREATE/MODIFY A PRIIP OR NOTIFY A NEW KID

 Packaged retail investment product

ADD NEW PRIIP (AND NOTIFY KID)

EDIT PRIIP (AND NOTIFY KID)

NOTIFY KID

VIEW KID

Step 3: A screen appears asking the user to enter the product information. The user has to enter at least the mandatory information indicated by an asterisk to be able to save the product. There is no validation rule for the information entered by the user.

*Name of the company (such as manufacturer, issuer, guarantor, advisor, distributor ...):* For the fields in which a company name has to be entered, the application proposes a list of options depending on (at least) the first 3 letters entered by the user. The options provided come from the FSMA's databases. The BCE/KBO number (if existing) appears alongside the company names proposed in order to enable the user to make the correct choice. It may be that the company name does not appear among the options. It is therefore possible for the user to enter a company name that is not on the list. In that case, the user can enter the basic information about the company on the following screen. One of the items of information is the company's legal form. If no legal form applies, choose the option **“Other legal form”**. This information will be saved at the group account level and the name of the company will later appear on the list of companies suggested.



### CREATE A NEW PRIIP

PRIP name \*

ISIN Code (if any) Unique product identifier (if any)

BE0123456789

Commercialization start date Commercialization end date (if any)

dd/mm/yyyy

Start of subscription period (if any) End of subscription period (if any)

dd/mm/yyyy

Manufacturer \*

Issuer (if different from manufacturer)

Advisors, distributors or any other person advising on, or selling, the PRIIP (if known)

Guarantor (if any)

Comments

Step 4: A screen appears, summarizing the data entered. The user will choose one of the following options proposed:

- a) **Save:** He or she saves the product without the KID notification having been made at this stage. In that case, the product is added to the group account tree so it can be selected later for a new action. Once created, a product can no longer be deleted, but it can be edited.
- b) **Save and notify KID:** If the user chooses to notify the KID immediately, he or she moves to the next step.

**PRIP OVERVIEW**

**!** You are about to save the following information about the PRIP. Once you save the PRIP, the PRIP cannot be deleted anymore.

PRIP name	INV prod 001
ISIN code	NL000000000
Unique product identifier	NOTREIDENTIF001
Commercialization start date	04 Sep 2017
Commercialization end date	18 Jul 2019
Start of subscription period	31 Aug 2017
End of subscription period	04 Sep 2017
Manufacturer	My company
Issuer	Issuer 01
Distributors	Advisor 001
Guarantor	Guarantor 001
Comments	Little reminder ...

**!** The below company does not exist in the FSMA database. Please fill in the following information. Once you save the PRIP, this information can no longer be modified.

My company

Address

Country (of head office)

Belgium

Legal form

Other legal form

KBONumber

0544279965

LEI code

123400ABCD56EF7GH89

[BACK](#) [SAVE](#) [SAVE AND NOTIFY KID](#)

Step 5: A screen appears, proposing that the user upload a KID. The user must choose a language for each KID. There is no obligation to upload a KID in each language. Several KIDs can be uploaded at the same time. The total size of the files cannot exceed 5 MB. Only the PDF format is accepted for the notification of KIDs. The KIDs are notified by clicking “**Notify KID**”. Users are reminded that the notification is definitive and the user will no longer be able to delete a KID that has been notified. The product is added to the group account tree so that it can be selected later for a new action. Once created, a product cannot be deleted, but it can be edited. The KIDs that have been notified are presented in chronological order under the product to which they relate. A confirmation email is sent to the email address of the user who notified the KID as well as the email address linked to the group account. The various users in the group account are also copied on the confirmation email.

**NOTIFY KID**

PRIP name	INV prod 001 (Click to expand)
Unique product identifier	OURIDENTIF001
Commercialization start date	04/09/2017
Commercialization end date (if any)	18/07/2019
End of subscription period	31/08/2017
Start of subscription period	04/09/2017
Manufacturer	My company
Issuer	Issuer 001
Distributors	Advisor 001
Guarantor	Guarantor 001
Comments	Our comments.

[SELECT FILE](#)

Please select the language of the KID

Choose a language

[ADD KID \(PDF\)](#)

**KIDs to upload**

(Only .pdf documents are allowed to be attached)

FINPRO (INV KID) product ABC - EN.pdf	English	0.12 MB	
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**!** Warning : Notifying a KID is a definitive action. Any update or correction requires a new KID notification.

[NOTIFY KID](#) [CANCEL](#)

### Subsequent actions

Once a product has been created (with or without notification of the KID which relates to that product), it is shown in the tree and can be selected by the user for one of the following actions:

- a) **Edit PRIIP (and notify KID)**: this option makes it possible to modify the information on a product and, if necessary, to notify a (new) KID. The information about a product can be modified at any time, whether or not the KID has already been notified.
- b) **Notify KID**: this option makes it possible to notify a new KID for a product that is already on the tree.



The user can see the KIDs by placing the cursor on the selected KID on the list and clicking “**View KID**”.

The “**Add new PRIIP (and notify KID)**” button is activated only if the user is at the top of the (name of the group account) tree.

The products shown on the tree for which no KID has been notified yet are indicated in orange, so as to draw attention to the fact that an action is required.

Products are sorted in alphabetical order. There is no functionality in the current version of the application to filter or search for a product on the tree.

#### **b. Insurance-based investment products**

So as to offer the possibility of notifying the KIDs correctly depending on whether or not a Multi-Option Product (hereafter “MOP”) with a generic KID is involved, the information about the PRIIP is split into 2 levels: the contract level and the (optional) internal fund level. If the manufacturer of a MOP decides to notify a generic KID, it is unnecessary to enter the information at the level of the internal fund. If this is not the case, the user will introduce under the contract the information relating to each internal fund for which a KID must be notified.

Step 1: The user selects a group account of the “Insurance-based investment product” type.

Step 2: A screen appears, showing on the left hand side the name of the group account and, where applicable (if products have already been created) the tree for these products and, on the right, the different options offered to the user depending on where he is on the tree. At this stage, the user is positioned at the top of the (name of group account) tree and clicks “**Add contract (and notify KID)**”.

## CREATE/MODIFY A PRIIP OR NOTIFY A NEW KID

Insurance-based investment product  
 > test product insurance 1

ADD CONTRACT (AND NOTIFY KID)
EDIT CONTRACT (AND NOTIFY KID)
NOTIFY KID
VIEW KID

Step 3: A screen appears asking the user to enter the contract information. The user has to enter at least the mandatory information indicated by an asterisk to be able to save the contract. There is no validation rule for the information entered by the user.

*Name of the company (such as manufacturer, issuer, guarantor, advisor, distributor ...):* For the fields in which a company name has to be entered, the application proposes a list of options depending on (at least) the first 3 letters entered by the user. The options provided come from the FSMA's databases. The BCE/KBO number (if existing) appears alongside the company names proposed in order to enable the user to make the correct choice. It may be that the company name does not appear among the options. It is therefore possible for the user to enter a company name that is not on the list. In that case, the user can enter the basic information about the company on the following screen. One of the items of information is the company's legal form. If no legal form applies, choose the option **"Other legal form"**. This information will be saved at the group account level and the name of the company will later appear on the list of companies suggested.

CREATE A NEW CONTRACT

Contract name \*  
 CONTRACT ABC

Insurance branch  
 BR23 / TAK23

Commercialization start date  
 02/01/2017

Commercialization end date (if any)  
 dd/mm/yyyy

Manufacturer \*  
 Manufacturer 001

Advisors, distributors or any other person advising on, or selling, the PRIIP (if known)  
 Advisor 001

Comments

NEXT CANCEL

Step 4: A screen summarizing the data entered appears. The user will choose one of the following options proposed:

- Add a new fund:** The manufacturer has not opted for the generic KID (for a MOP) and the user must enter the information for each internal fund for which a KID must be notified. He or she now moves to *Step 5 (b)*.
- Save:** The manufacturer has opted for the generic KID (for a MOP) and the user will not benefit from entering the information at the internal fund level. The user decides to save the contract without the KID notification having been made at this stage. The contract is added to the group account tree so that it can be selected later for a new action. Once created, a contract cannot be deleted, but it can be edited.
- Save and notify KID:** The manufacturer has opted for the generic KID (for a MOP) and the user will not benefit from entering the information at the internal fund level. The manufacturer decides to notify the KID immediately, in which case he or she moves to *step 5 (a)*.

**CONTRACT OVERVIEW**

**i** You are about to save this contract. Once you save the contract, it cannot be deleted anymore.

Contract name	CONTRACT ABC
Insurance branch	BR23 / TAK23
Commercialization start date	02 Jan 2017
Manufacturer	Manufacturer 001
Distributors	Advisor 001

[BACK](#) [ADD NEW FUND](#) [SAVE](#) [SAVE AND NOTIFY KID](#)

Step 5 (a): A screen appears, proposing that the user upload a KID. The user must choose a language for each KID. There is no obligation to upload a KID in each language. Several KIDs can be uploaded at a time. The total size of the files cannot exceed 5 MB. Only the PDF format is accepted for the notification of KIDs. The KIDs are notified by clicking “**Notify KID**”. Users are reminded that the notification is definitive and the user will no longer be able to delete a KID that has been notified. The product is added to the group account tree so that it can be selected later for a new action. Once created, a product cannot be deleted, but it can be edited. The KIDs that have been notified are presented in chronological order under the product to which they relate. A confirmation email is sent to the email address of the user who notified the KID as well as the email address linked to the group account. The various users in the group account are also copied on the confirmation email.

#### NOTIFY KID

PRIP name test product assurance 1 (Click to expand)

Insurance branch	BR26 / TAK26
Commercialization start date	02/01/2017
Manufacturer	Manufacturer 001

[SELECT FILE](#)



Please select the language of the KID

Choose a language

[ADD KID \(PDF\)](#)

KIDs to upload [ADD KID \(PDF\)](#)

(Only .pdf documents are allowed to be attached)

 FINPRO (INS KID) product ABC - EN.pdf	English	0.12 MB	
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**Warning** : Notifying a KID is a definitive action. Any update or correction requires a new KID notification.

[NOTIFY KID](#) [CANCEL](#)

Step 5 (b): A screen appears asking the user to enter the various items of information relating to the internal fund. The user has to enter at least the mandatory information indicated with an asterisk to be able to save the contract. There is no validation rule for the information entered by the user.

**CREATE A NEW FUND**

Contract name  
C001

Fund name \*

Commercialization start date  
dd/mm/yyyy

Commercialization end date (if any)  
dd/mm/yyyy

Manufacturer \*  
[\* Manufacturer 001]

Advisors, distributors or any other person advising on, or selling, the PRIIP (if known)  
[\* Advisor 001]

Comments

**NEXT** **CANCEL**

Step 6 (b): A screen appears, summarizing the data entered. The user will choose one of the following options proposed:

- Save:** The user decides to save the fund without the KID notification having been made at this stage. The fund is added to the group account tree under the contract to which it relates, so that it can be selected later for a new action. Once created, a fund cannot be deleted, but it can be edited.
- Save and notify KID:** The user decides to notify the KID immediately, in which case he or she moves to *step 7 (b)*.

**FUND OVERVIEW**

**!** You are about to save the following information. Once you save the fund, the fund can not be deleted anymore.

Contract name	C001
Fund name	FONDS1
Commercialization start date	27 Nov 2017
Manufacturer	Manufacturer 001
Distributors	Advisor 001

**BACK** **SAVE** **SAVE AND NOTIFY KID**

Step 7 (b): A screen appears, proposing that the user upload a KID. The user must choose a language for each KID. There is no obligation to upload a KID in each language. Several KIDs can be uploaded at a time. The total size of the files cannot exceed 5 MB. Only the PDF format is accepted for the notification of KIDs. The KIDs are notified by clicking “**Notify KID**”. Users are reminded that the notification is definitive and the user will no longer be able to delete a KID that has been notified. The fund is added to the group account tree under the contract to which it relates, so that it can be selected later for a new action. Once created, a fund cannot be deleted, but it can be edited. The KIDs that have been notified are presented in chronological order under the product to which they relate. A confirmation email is sent to the email address of the user who notified the KID as well as the email address linked to the group account. The various users in the group account are also copied on the confirmation email.

## NOTIFY KID

PRIIP name	FUND 1 (Click to expand)
Contract name	test product insurance 1
Commercialization start date	27/11/2017
Commercialization end date (if any)	04/05/2020
Manufacturer	My company
Distributors	Advisor 001
Comments	<input type="text" value="Our comments."/>

**SELECT FILE**

Please select the language of the KID

Choose a language ▼

**KIDs to upload** **ADD KID (PDF)**

(Only .pdf documents are allowed to be attached)

File Name	Language	Size	Actions
FINPRO (INS KID) product ABC - EN.pdf	English	0.12 MB	

**Warning** : Notifying a KID is a definitive action. Any update or correction requires a new KID notification.

**NOTIFY KID** **CANCEL**

Where several internal funds have to be created under a contract, the user is to select the contract from the tree and choose the option “**Add fund (and notify KID)**”. It will proceed by an iterative process until all the internal funds have been added.

Subsequent actions

Once a contract has been created (with or without notification of the KID which relates to that product), it is shown in the tree and can be selected by the user for one of the following actions:

- Add fund (and notify KID)**: this option makes it possible to add an internal fund (and the associated information) under a contract.
- Edit contract (and notify KID)**: this option makes it possible to modify the information on a contract and, if necessary, to notify a (new) KID. The information about a product can be modified at any time, whether or not the KID has already been notified.
- Notify KID**: this option makes it possible to notify a new KID for a contract that is already in the tree.

**CREATE/MODIFY A PRIIP OR NOTIFY A NEW KID**

Insurance-based investment product

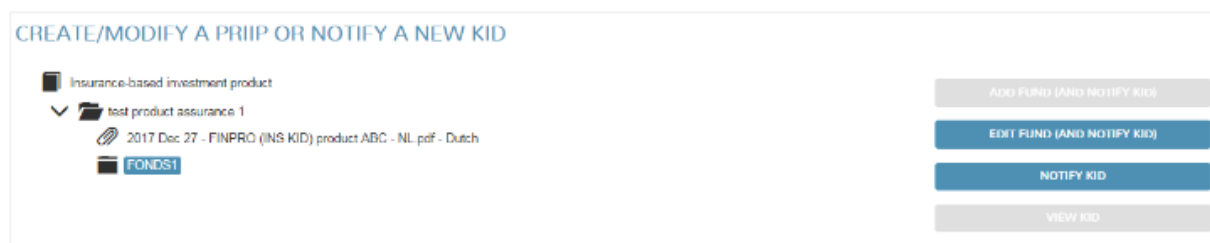
>  test product assurance 1

**ADD FUND (AND NOTIFY KID)**  
**EDIT CONTRACT (AND NOTIFY KID)**  
**NOTIFY KID**  
 VIEW KID

Once a fund has been created (with or without notification of the KID which relates to that fund), it is shown on the tree under the contract to which it relates and can be selected by the user for one of the following actions:

- Edit fund (and notify KID)**: this option makes it possible to modify the information on a fund and, if necessary, to notify a (new) KID. The information about a fund can be modified at any time, whether or not the KID has already been notified.

- b) **Notify KID**: this option makes it possible to notify a new KID for a fund that is already in the tree.



The user can see the KIDs by placing the cursor on the selected KID on the tree and clicking “**View KID**”.

The “**Add contract (and notify KID)**” button is activated only if the user is at the top of the (name of the group account) tree.

The contracts and funds included in the tree for which no KID has been notified yet are shown in orange, to indicate that a KID notification is required. If a KID is notified at the contract level and the funds were created under the contract, the assumption is that the KID in question concerns all the underlying funds and the funds are no longer shown in orange.

Products are sorted in alphabetical order. There is no functionality in the current version of the application to filter or search for a product on the tree.

## 6. Correcting and updating the KIDs

If a KID has to be updated or corrected, the user should select the product for which he or she wishes to notify the new version of the KID, and click on “**Notify KID**”. The new KID will be added to the tree under the product to which it relates. The old versions are stored in the tree, and the FSMA will only take into consideration the last version of the KID that was notified, namely, the one at the top of the tree, since the KIDs are sorted in chronological order.

A notified KID cannot be deleted.

## 7. Editing and deleting data, users and group accounts

### *Data*

The data relating to products, contracts and funds can be edited at any time, even after the notification of the KID (or KIDs) which relates (relate) to those products, contracts or funds.

A product, contract or fund, once saved and therefore created in the tree, cannot be deleted, regardless of whether or not a KID has been notified.

### *Users*

Once a user has been added to a group account, he or she cannot be deleted.



### *Group accounts*

The description and email address linked to the group account can be edited at any time. Once a group account has been created, however, it cannot be deleted.

### *Submitting a request for deletion to the FSMA*

The user will, however, be able to submit a request to delete data, users and group accounts by sending an email to the address [finprosupport@fsma.be](mailto:finprosupport@fsma.be).

As regards data, the possibility of deletion allows the user to avoid storing data within the application that had been entered erroneously and that cannot be corrected in any other way. It should be borne in mind when requesting to delete data that all the data relating to a product, contract or fund can be edited. If the KID has already been notified, it will not be possible under any circumstances to delete the product, contract or fund to which it relates.

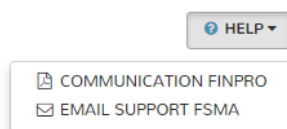
As regards a group account, the possibility of deletion allows the user to delete group accounts that are not being used. If one or several KIDs have been notified under the group account, it will not be possible under any circumstances to delete the group account.

As regards a user, the possibility of deletion allows a user to delete from the group account users who no longer need to belong to a group account. Any user of the given group account can request the deletion of another user belonging to the same group account.

## **8. Support**

Questions about the application may be sent to the address [finprosupport@fsma.be](mailto:finprosupport@fsma.be).

This document is accessible within the application by clicking the **“Help”** button and by activating the first option (**“Communication FinPro”**).



The application officially supports the Chrome, Internet Explorer (version 11 onwards) and Firefox browsers.