



PII Interface Specification

Please respond to:

LME IT Solutions Delivery

Change History

Revision	Date	Section	Section Name	Change
1.0	12 Jul 17			Original version for Town Hall
2.0	27 Jul 17	2	File Structure and Naming Convention	Added reference for XML Header format and response file to UDG Interface Specification
2.0	27 Jul 17	2.1	PII File Specification	<ul style="list-style-type: none"> • Changed format of Field Names • Changed Type to IdentifierType • Changed Natural Person values in IdentifierType to <ul style="list-style-type: none"> ○ P – Natural Person (Passport ID) ○ N – Natural Person (National ID) ○ C – Natural Person (CONCAT) • Changed Country, FirstName, Surname and DOB to Mandatory for Identifier Type P, N or C • Changed LongCode to Mandatory for all Identifier Types • Added description and a further example to LongCode
2.0	27 Jul 17	2.1.1	PII XML Output Example	<ul style="list-style-type: none"> • Changed XML Header to align with UDG specification • Changed format of XML fields to match FCA MDP format • Corrected SubmissionDateTime to ISO standard format • Changed Type to IdentifierType • Changed EffectDate and EndDate values to ISO date format
2.0		4	Frequency, Availability	XML Header example changed to align with UDG specification
2.0	02 Aug 17	2.1	File Specification	Instruction on how to amend a current record added as N.B. to EndDate field description.
2.0	09 Aug 17	1.1	Introduction	Remove reference to FIX/AMFE file format. Add test that short code must be unique.
2.0	09 Aug 17	2.1	PII File Specification	Specify that Short Code must be unique per member and the maximum value. Remove mandatory requirement for Country Code, First Name, Surname and DOB.
2.1	18 Sep 17	2.1	PII File Specification	Clarify that short code is an 8 byte field, not 8 digit.
2.1	18 Sep 17	2.1.1	PII XML Output example	Align examples to XSD
2.1	18 Sep 17	4	Frequency	Remove requirement for empty files each day if no changes are necessary.
2.2	13 Oct 17	2.1	PII File Specification	Country field has been changed to Mandatory

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1 Introduction

MiFID II will apply from 3 January 2018 and under these new MiFID II regulations the LME are obligated to produce several reports to the FCA. Some of these reports require data which needs to be provided by the LME members.

1.1 PII

MiFID II mandates the use of LEIs, Algo IDs and/or National IDs or Natural Person Personal Identifiable Information for market participants which LME will have to collect from Members. From January 3rd, 2018 LME will provide the FCA with transaction and position reports containing this data plus have the facility to provide Order Record Keeping to the FCA with this information included upon request.

Members will have to provide a new file, **Personal Identifiable Information File (PII)**, containing PII data as an initial full upload followed by a daily update of any new participants that as they are brought on board.

PII data for all LME participants including LEIs will be collected from each Member via the following channel:

- as an XML report sent via SFTP to a pre-defined encrypted file share.

NOTE: All sort code values must be unique per submitting member.

This document describes the content and validation mechanisms for this file.

2 File structure and Naming Convention

The following table describes the structure of the PII data record in conjunction with the Static reference data specified in the [Guidance Notes](#).

Please note that the standard header record used in conjunction with this is described in the UDG Interface Specification along with the response file mechanism.

2.1 PII File Specification

Field no	Field name	Description	Format	Mandatory/ Optional: M/O	Sample data
1	Update_Date_Time	The UTC date and time that the record was submitted for processing.	{DATE_TIME_FORMAT} ISO 8601 date and time format YYYY-MM-DDThh:mm:ss.dddZ	M	2017-01-01T12:30:00.000000Z
2	Mnemonic	The mnemonic allocated by the LME for the participant. Usually Member mnemonic but could be a non-Member mnemonic for Position Reporting.	Char 3	M	'ABC'
3	Short_Code	Unique 8 byte integer for the PII. Must be unique per Mnemonic.	Integer	M	'12345678' Must be greater than 3. Max value is $2^{64} - 1$ (ie 8 byte INT)
4	Type	The type of PII data that this ShortCode is used to identify.	Char 1	M	A – AlgoID L – LEI P – Natural Person (Passport ID) N – Natural Person (National ID) C – Natural Person (CONCAT)
5	Country	2 letter country code, as defined by ISO 3166-1 alpha-2 country code.	{ALPHANUM-2}	M	'GB' – Great Britain 'DE' – Germany
6	Long_Code	Algorithm ID, Legal Entity Identifier (LEI) or National ID. See Guidance Notes for valid values. Note that Legal Entity Identifier (LEI) is 20 characters alphanumeric. All identifiers for a natural person must be prefixed by the ISO 3166 two character country code.	{ALPHANUM-256}	M	'ALGO1234' – Algo ID '213800NB8G5VRT1DXC91' – LEI 'GB19900704JOHN#SMITH' - NaturalPerson (CONCAT)

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Classification: Public

Field no	Field name	Description	Format	Mandatory/ Optional: M/O	Sample data
7	First_Name	First Name	{ALPHANUM-256}	O	'John'
8	Surname	Surname	{ALPHANUM-256}	O	'Smith'
9	DOB	Date of Birth	{DATEFORMAT} ISO 8601 date format : YYYY-MM-DD	O	1990-07-04
10	Effect_Date	Date of when this registration is effective from	{DATEFORMAT} - YYYY-MM-DD	M	2017-01-01
11	End_Date	To be completed if an end date for the registration is known, otherwise leave null (empty) if an end date for the registration is not known. N.B. To amend a record, the current record must be set with an end date of the last valid date of that version and a new record created with a start date of the following day.	{DATEFORMAT} - YYYY-MM-DD	O	2017-12-31

2.1.1 PII XML Output Example

```

<?xml version="1.0" ?>

<REPORT>
  <HEADER>
    <MEMBER_MNEMONIC>ABC</MEMBER_MNEMONIC>
    <FILE_TYPE>PIISUB</FILE_TYPE>
    <SEQ_NO>000004</SEQ_NO>
    <PREVIOUS_SEQ_NO>000003</PREVIOUS_SEQ_NO>
    <YEAR>17</YEAR>
  </HEADER>
  <DATA>
    <ROW>
      <UPDATE_DATE_TIME>2017-07-14T19:00:01Z</UPDATE_DATE_TIME>
      <MNEMONIC>ABC</MNEMONIC>
      <SHORT_CODE>11111111</SHORT_CODE>
      <TYPE>A</TYPE>
      <COUNTRY></COUNTRY>
      <LONG_CODE>ALGO1234</LONG_CODE>
      <FIRST_NAME></FIRST_NAME>
      <SURNAME></SURNAME>
      <DOB></DOB>
      <EFFECT_DATE>2017-01-01</EFFECT_DATE>
      <END_DATE>2017-12-31</END_DATE>
    </ROW>
    <ROW>
      <UPDATE_DATE_TIME>2017-07-14T19:00:01Z</UPDATE_DATE_TIME>
      <MNEMONIC>ABC</MNEMONIC>
      <SHORT_CODE>22222222</SHORT_CODE>
      <TYPE>L</TYPE>
      <COUNTRY></COUNTRY>
      <LONG_CODE>213800NB8G5VRT1DXC91</LONG_CODE>
      <FIRST_NAME></FIRST_NAME>
      <SURNAME></SURNAME>
      <DOB></DOB>
      <EFFECT_DATE>2017-01-01</EFFECT_DATE>
      <END_DATE></END_DATE>
    </ROW>
    <ROW>
      <UPDATE_DATE_TIME>2017-07-14T19:00:01Z</UPDATE_DATE_TIME>
      <MNEMONIC>ABC</MNEMONIC>
      <SHORT_CODE>33333333</SHORT_CODE>
      <TYPE>N</TYPE>
      <COUNTRY>GB</COUNTRY>
      <LONG_CODE>AB123456C</LONG_CODE>
      <FIRST_NAME>JANE</FIRST_NAME>
      <SURNAME>SMITH</SURNAME>
      <DOB>1992-03-10</DOB>
      <EFFECT_DATE>2017-01-01</EFFECT_DATE>
      <END_DATE></END_DATE>
    </ROW>
    <ROW>
      <UPDATE_DATE_TIME>2017-07-14T19:00:01Z</UPDATE_DATE_TIME>
      <MNEMONIC>ABC</MNEMONIC>
      <SHORT_CODE>44444444</SHORT_CODE>
      <TYPE>C</TYPE>
  </DATA>
</REPORT>

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<COUNTRY>IE</COUNTRY>
<LONG_CODE>GB19900704JOHN#SMITH</LONG_CODE>
<FIRST_NAME>JOHN</FIRST_NAME>
<SURNAME>SMITH</SURNAME>
<DOB>1990-07-04</DOB>
<EFFECT_DATE>2017-01-01</EFFECT_DATE>
<END_DATE>2017-12-31</END_DATE>
</ROW>
</DATA>
</REPORT>
    
```

2.2 Naming Convention

Refer to the UDG Interface Specification.

3 File Validation Rules

Refer to the UDG Interface Specification.

4 Frequency, availability

Each Member will provide the LME with a single PII file at the scheduled times below:

When	Time	Description
Start of Day	07:00	Mandatory - incremental update of any new participants for the previous trading day. Optional – incremental update providing early advice of any new participants for the current or future trading days.

Members only need to submit a PII file if the data has changed.

More than one file can be processed in a day if required, e.g. if a participant has been omitted or wrongly advised in error.

The Member will have to submit an initial file containing all of the Member’s PII data for its participants.

5 Guidance Notes

The following tables refer to the definition in association to the PII file structure.

5.1 National Client Identifiers

The table below details the National Client Identifiers for natural persons to be used in FCA reports .

ISO3166 – 1 alpha 2	Country Name	1 st Priority Identifier	2nd Priority Identifier	3rd Priority Identifier
AT	Austria	CONCAT		
BE	Belgium	Belgian National Number (Numéro de registre national – Rijksregisternummer)	CONCAT	
BG	Bulgaria	Bulgarian Personal Number	CONCAT	
CY	Cyprus	National Passport Number	CONCAT	
CZ	Czech Republic	National identification number (Rodné číslo)	Passport Number	CONCAT
DE	Germany	CONCAT		
DK	Denmark	Personal identity code 10 digits alphanumerical: DDMMYYXXXX	CONCAT	
EE	Estonia	Estonian Personal Identification Code (Isikukood)		
ES	Spain	Tax identification number (Código de identificación fiscal)		
FI	Finland	Personal identity code	CONCAT	
FR	France	CONCAT		
GB	United Kingdom	UK National Insurance number	CONCAT	
GR	Greece	10 DSS digit investor share	CONCAT	
HR	Croatia	Personal Identification Number (OIB – Osobni identifikacijski broj)	CONCAT	
HU	Hungary	CONCAT		
IE	Ireland	CONCAT		
IS	Iceland	Personal Identity Code (Kennitala)		
IT	Italy	Fiscal code (Codice fiscale)		

LI	Liechtenstein	National Passport Number	National Identity Card Number	CONCAT
LT	Lithuania	Personal code (Asmens kodas)	National Passport Number	CONCAT
LU	Luxembourg	CONCAT		
LV	Latvia	Personal code (Personas kods)	CONCAT	
MT	Malta	National Identification Number	National Passport Number	
NL	Netherlands	National Passport Number	National identity card number	CONCAT
NO	Norway	11 digit personal id (Foedselsnummer)	CONCAT	
PL	Poland	National Identification Number (PESEL)	Tax Number (Numer identyfikacji podatkowej)	
PT	Portugal	Tax number (Número de Identificação Fiscal)	National Passport Number	CONCAT
RO	Romania	National Identification Number (Cod Numeric Personal)	National Passport Number	CONCAT
SE	Sweden	Personal identity number	CONCAT	
SI	Slovenia	Personal Identification Number (EMŠO: Enotna Matična Številka Občana)	CONCAT	
SK	Slovakia	Personal number (Rodné číslo)	National Passport Number	CONCAT
All other countries		National Passport Number	CONCAT	

5.1.1 Identification of a Natural Person

1. A natural person shall be identified in a transaction report using the designation resulting from the concatenation of the ISO 3166-1 alpha-2 (2 letter country code) of the nationality of the person, followed by the national client identifier listed in RTS 22, Annex II based on the nationality of the person.
2. The national client identifier referred to in paragraph 1 shall be assigned in accordance with the priority levels provided in RTS 22, Annex II using the highest priority identifier that a person has regardless of whether that identifier is already known to the investment firm.
3. Where a natural person is a national of more than one European Economic Area (EEA) country, the country code of the first nationality when sorted alphabetically by its ISO 3166-1

alpha-2 code and the identifier of that nationality assigned in accordance with paragraph 2 shall be used. Where a natural person has a non-EEA nationality, the highest priority identifier in accordance with the field referring to 'all other countries' provided in RTS 22, Annex II shall be used. Where a natural person has EEA and non-EEA nationality, the country code of the EEA nationality and the highest priority identifier of that nationality assigned in accordance with paragraph 2 shall be used.

4. Where the identifier assigned in accordance with paragraph 2 refers to CONCAT, the natural person shall be identified by the investment firm using the concatenation of the following elements in the following order:
 - a) the date of birth of the person in the format YYYYMMDD;
 - b) the five first characters of the first name;
 - c) the five first characters of the surname.
5. For the purposes of paragraph 4, prefixes to names shall be excluded and first names and surnames shorter than five characters shall be appended by '#' so as to ensure that references to names and surnames in accordance with paragraph 4 contain five characters. All characters shall be in upper case. No apostrophes, accents, hyphens, punctuation marks or spaces shall be used.