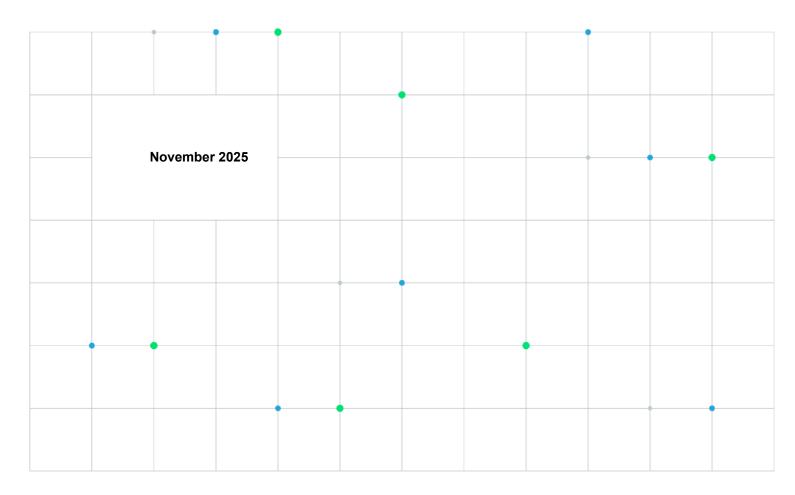


CME Group PII Data Submission User Guide

Version 5





Contents

1. Introduction	3
2. Participants' obligations	4
3. PII data required	4
3.1 National client identifiers and priority levels	5
3.1.1 'CONCAT'	7
3.1.2 PII data Post Brexit Submission (UK national persons)	7
4. Process Overview	7
4.1 'PII Manager'	7
4.1.1 PII Manager registration	8
4.1.2 PII Manager access	8
4.2 Globex User Signature (GUS) creation	8
4.3 PII data submission	8
4.3.1 Manual (individual) submission	9
4.3.2 File (csv) upload	13
4.4 Error messages	17
4.5 Reviewing the submission of PII data	18
4.6 Request the deletion of PII data	20
4.6.1 Manual (individual) - deletion	20
4.6.2 File (csv) upload - deletion	21
4.7 Miscellaneous	21
5. Data handling and Participant's rights	23
5.1 Participant Data Handling Disclaimer	23
5.2 Participant's rights	23
6. Contact Us.	24



1. Introduction

Pursuant to Directive 2014/65/EU ("MiFID II")¹ and Regulation (EU) No 600/2014 ("MIFIR")¹, the trading venue operators are required to identify participant firms, their natural person users and their trading algorithms for regulatory reporting and record keeping purposes.

Under MIFIR and the supplementing Regulatory Technical Standards for the reporting of transactions to competent authorities ("RTS 22")¹ and for the maintenance of relevant data relating to orders in financial instruments ("RTS 24"), the trading venues are required to report details of transactions which are executed through its systems by a firm which is not itself subject to the MiFiR transaction reporting regime (non-EEA for EEA trading venues / non-UK for UK trading venues) and to maintain the relevant data relating to all orders in financial instruments which are advertised through its systems.

The regulatory requirements apply to CME Group's Cash Markets EU and UK regulated entities which operate the trading venues (jointly, the "Trading Venues") listed below:

Market	Legal Entity	Trading Venue and MIC code	Country of Incorporation	CME Cash Markets MiFID Products	Regulatory documents	
Producto -	CME Amsterdam B.V.	BrokerTec EU RM - CLOB EU (BTAM) and Quote EU (BTQE)	The Financing		https://www.cmegroup .com/markets/brokerte	
BrokerTec	BrokerTec Europe Limited	BrokerTec UK MTF - CLOB (BTEE)	United Kingdom	UK Gilt Repo	c/regulatory-documen ts.html	
EBS	BrokerTec Europe Limited	EBS UK MTF (XEBS)	United Kingdom	Non-Deliverable Forwards (NDFs)	https://www.cmegroup .com/markets/ebs/rea _ulatory-documents.htm _l#documentation	

To comply with these regulations, the Trading Venues must collect and retain the following participant information for trading on their systems:

- Legal Entity Identifier (LEI) ISO 17442 (https://www.gleif.org/en)
- Natural Person Identification Information (PII)
- Designation for identifying the algorithm trading systems

Trading Venues' participants are required to supply and maintain updated records of this data in order to satisfy the eligibility criteria for trading on the Trading Venues, as set out in the relevant Trading Venue rulebooks.

¹ and the UK onshored version of the same as amended and transposed into the laws of the United Kingdom pursuant to the European Union (Withdrawal) Act 2018 and the European Union (Withdrawal Agreement) Act 2020.



The purpose of this user guide is to provide participants with a summary of:

- the participant's obligations to submit and maintain Personally Identifiable Information ("PII");
- the PII data required;
- the process to submit the PII data; and
- the participant's rights regarding the PII and information regarding CME Group's data collection, storage, security, retention;.

2. Participants' obligations

To be allowed to trade the CME Cash Markets MiFID Products, participants of the Trading Venues must submit the PII data for manual traders and individuals operating algorithm trading systems. Failure to submit PII data will result in traders not being allowed to trade. The PII data is linked to the Short Code associated with a Globex User Signature ("GUS") ID (authorised trader).

Participants shall have responsibility for the completeness, accuracy and timely submission of the PII data of its natural persons. Participants are responsible for maintaining the PII data and ensuring PII data is up to date.

Algorithmic trading participants are required to provide the designation for identifying the algorithm trading systems through Request Center (ESS) by completing the Algorithmic Trading Certification Form process explained at CME Group - User Help System. The designation for identifying the computer algorithm, which shall be unique for each set of code or trading strategy that constitutes the algorithm, used consistently when referring to the algorithm or version of the algorithm once assigned to it, and unique over time. The algo identifier is linked to the algo short code associated with the GUS ID.

3. PII data required

The Trading Venues shall identify natural persons by 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 of the person (CCPT - Passport Number; NIDN - National Identification Number; CONCAT - Concatenation).

For that purpose, Participants must ensure they submit the data as required below:

Field	Format and standards	Description / Details
LEI (Legal Entity Identification)	Alphanumeric (20 characters)	ISO 17742 (<u>GLEIF - LEI</u>)
Shortcode	Numeric only (10-digit max, initial digit must not be zero)	The shortcode identifies the natural person
First Name	Alphabetic	Natural person's first name



Last Name	Alphabetic	Natural person's last name / surname
Country of the branch	ISO 3166-1 alpha-2 (two-letter code) ISO 3166 - Country codes	Identifies the country of the branch responsible for supervising the natural person (trader)
Nationality	ISO 3166-1 alpha-2 (two-letter code) ISO 3166 - Country codes	Natural person's nationality
ID Туре	Must be one of the three options: CCPT, NIDN or CONCAT	Must correspond to the priority of identifiers required for each country - as set out in section 3.1 'CCPT': Passport Number 'NIDN': National Identification number 'CONCAT': Concatenation
ID value	Alphanumeric The standard format for CONCAT is described in section 3.1.1	The ID value for the corresponding ID Type
Update Type	Must be one of the two options: ADD or DELETE	Indicate: 'ADD' for requesting the addition of new records 'DELETE' for requesting the deletion of existing records

3.1 National client identifiers and priority levels

The national client identifier (ID Type and ID Value) for natural persons shall be assigned in accordance with the priority levels provided in the table below, which can be found at RTS 22 - Annex II, using the highest priority identifier for that given nationality.

For information on how different national identifiers specified in the above table (Annex II of RTS 22) are represented, refer to <u>ESMA Q&A on MiFIR data reporting</u>.

Country code	Country Name 1st priority identifier		2nd priority identifier	3rd priority identifier
AT	AT Austria CONCAT			
BE	Belgium	Belgian National Number (Numéro de registre national – Rijksregisternummer)	CONCAT	
BG	BG Bulgaria Bulgarian Personal Number		CONCAT	CONCAT
СҮ	Cyprus National Passport Number		CONCAT	
CZ	Czech Republic	National identification number (Rodné číslo)	Passport number	CONCAT
DE	Germany	CONCAT		



- N	D	Personal identity code	0011047	
DK	Denmark	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* (please refer to section 3.1.2)	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	IT Italy Fiscal code (Codice fiscale)			
и	Liechtenstein	National Passport Number	National Identity Card Number	CONCAT
LT	T 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	
NO	Norway	11 digit personal id (Foedselsnummer)	CONCAT	
PL	Poland	National Identification Number (PESEL)	Tax Number (Numer identyfikacji podatkowej)	CONCAT
PT	Portugal	Tax number (Número de Identificação Fiscal)	National Passport Number	CONCAT
RO	Romania	National Identification Number (Cod Numeric Personal)	National Passport Number	
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 OTH	HER COUNTRIES	National Passport Number	CONCAT	



3.1.1 'CONCAT'

Where the identifier assigned refers to **CONCAT**, the natural person shall be identified by the participant 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.

Please note, for (b) and (c) forenames and surnames of less than five characters must be completed with "#" symbols so that the forenames and surnames shown contain five characters. The use of name prefixes, apostrophes, accents, hyphens, punctuation marks or spaces shall be excluded.

Participants shall have special consideration to the priority levels of the national client identifier. Except where explicitly requested as highest priority identifier (i.e. Germany, France, etc.), **CONCAT** shall not be used as an option if the correct PII data is available to be supplied.

3.1.2 PII data Post Brexit Submission (UK national persons)

As a result of Brexit, the **highest priority designation to identify <u>UK natural persons trading on EEA trading venues</u> (such as, BrokerTec EU RM) shall be <u>National Passport Number</u>**. If not available, the second priority identifier shall be <u>CONCAT</u>.

For UK natural persons trading on UK trading venues (such as, BrokerTec EU MTF and EBS UK MTF), the requirements for reporting remain the same as pre-Brexit. The **highest priority identifier shall be the <u>UK</u> National Insurance Number**, and if not available, the second priority identifier shall be <u>CONCAT</u>.

In case a UK natural person trades on both EEA and UK trading venues, participants shall be required to submit the highest priority identifier for each jurisdiction (National Passport Number and UK National Insurance Number), and if not available, CONCAT.

4. Process Overview

To comply with the obligations set out in <u>Section 2</u> of this guide, Participants must ensure they complete the following process:

4.1 'PII Manager'

The submission of PII data must be completed through the CME Customer Center by a registered 'PII Manager'. The PII Manager is a <u>user administration role available for BrokerTec and EBS</u>, responsible for submitting and maintaining PII data of natural persons' traders and individuals operating algorithm trading systems.

The submitted PII data shall only be accessible and available to those individuals granted a PII Manager role.



4.1.1 PII Manager registration

To be registered as a PII Manager, users should ensure they create a <u>CME Group Login ID</u> account enabled with multi-factor authentication.

Further details of the process to create the CME Group Login ID is available at <u>CME Group Login User Manual - User Help System and CME Group - Customer Center - User Help System - Access and Login.</u>

For additional assistance, please contact Enterprise Application & Systems Entitlements (EASE).

4.1.2 PII Manager access

Once the CME Group Login ID is created, the participant's Admin Manager can assign the PII Manager role by completing the following steps:

- (a) Access the CME Customer Center and select 'User Administration' under the Administration tab;
- (b) On the Search Entitlements, please search for existing users to view or manage entitlements (using either CME Group Login ID, name and/or email address);
- (c) Select the user to be assigned the PII Manager role;
- (d) Select the application 'PII Manager' and subsequently click on the 'Add entitlement' button to assign the PII Manager role.

Further details of the process are available at <u>CME Group - User Help System - User / Firm</u> Administration

For additional assistance, please contact Global Account Management (GAM).

4.2 Globex User Signature (GUS) creation

To create or update a Globex User Signature, Participants should follow the process available at:

- for BrokerTec: CME Group User Help System BrokerTec Globex User Signature
- for EBS: CME Group User Help System EBS Globex User Signature

As part of the product entitlement process for a GUS / Trader to be allowed to trade the CME Cash Markets MiFID Products, Participants are required to assign a Short Code and submit PII data records, as explained below. Failure to submit PII data will result in the GUS / Trader not being allowed to trade.

4.3 PII data submission

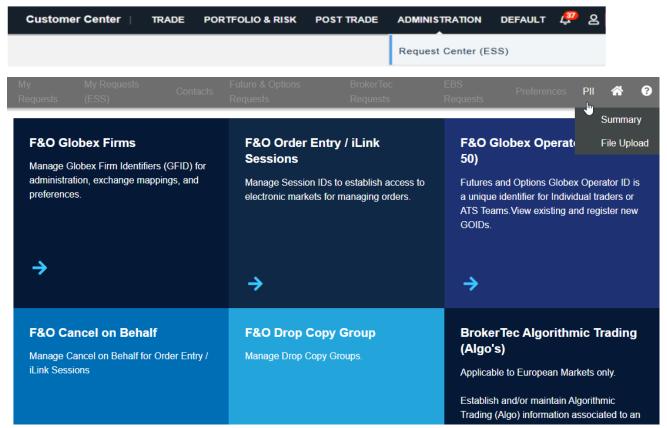
The PII Manager have the option to submit PII data via **two methods** through the CME Customer Center - Request Center (ESS):

- 1. Manual (individual) submission; and/or
- 2. File (csv) upload



As set out in <u>Section 2</u> of this guide, the PII data records are linked to the Short Code associated with the GUS / Trader for the relevant Participant legal entity identifier (LEI).

Once logged in to the CME Customer Center, the PII Manager shall select the Request Center (ESS) under the Administration Tab, and subsequently select the PII tab to access the two available methods.



4.3.1 Manual (individual) submission

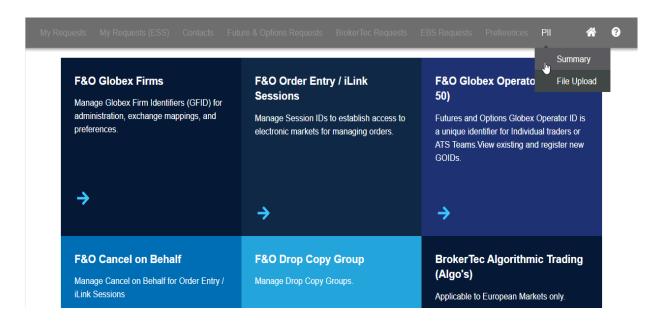
Participants can opt to use the **manual submission** functionality to upload <u>individual</u> PII data records, by completing the following steps:

(1) Select the 'Summary' tab;

This screen allows the PII Manager to (i) view the PII record status at each GUS / Authorised Trader and, (ii) add or request the deletion of the PII data records.

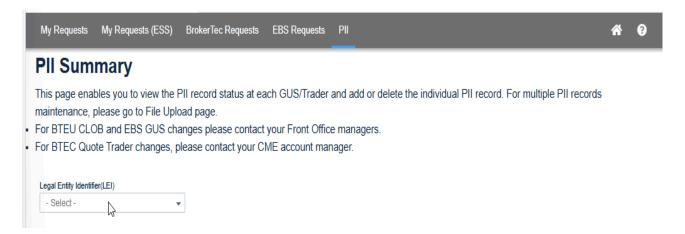
Participants are recommended to use the Summary tab to review the status of the listed GUS / Traders and associated Short Codes per LEI, as the 'Status' allows them to understand whether any action (add or delete PII data) is required.





(2) Select the Legal Entity Identifier (LEI) from the dropdown list;

The dropdown displays a list of LEIs to which the PII Manager is registered.



(3) After selecting the LEI, the page displays the list of GUS under the selected LEI.

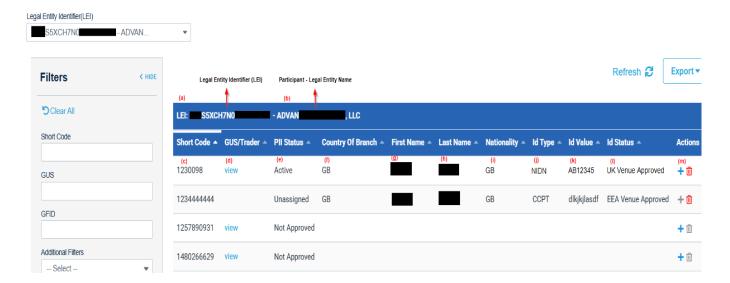
The list contains the following values:

- (a) Participant's LEI;
- (b) Participant's name;
- (c) Short code;
- (d) GUS/Trader;
- (e) PII status; (please refer to <u>Section 4.7</u> for further description)
- (f) Country of Branch;
- (g) First Name;
- (h) Last Name;
- (i) Nationality;
- (j) ID Type;



- (k) ID Value;
- (I) ID Status; (please refer to <u>Section 4.7</u> for further description)
- (m) Actions: ADD or DELETE;

Participants are able to filter by Short code, GFID or additional filters, such as GUS without PII or PII without GUS ("Unassigned") by using the left column 'Filters'.



(4) To submit individual PII data for a GUS/Trader with the associated Short Code displayed on the summary list, select the 'ADD ID Set' + button under Actions to access the 'PII Details' screen;

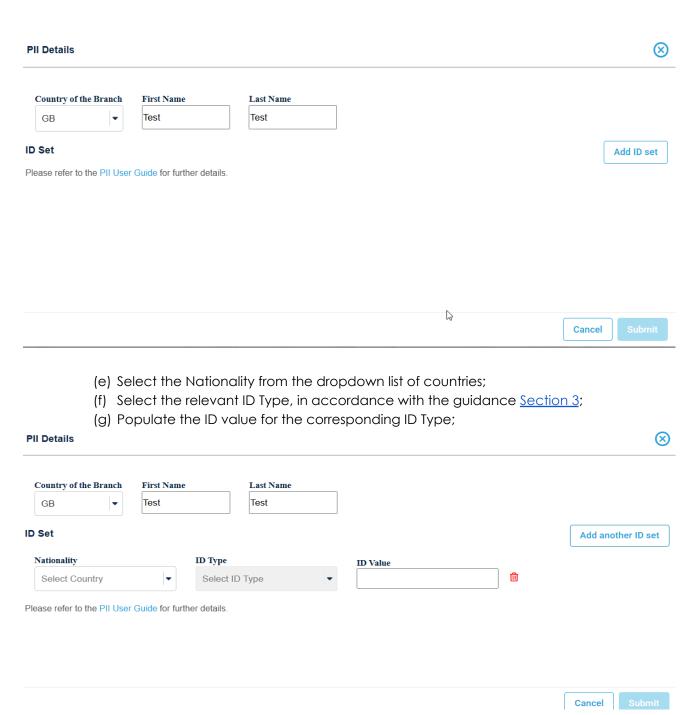


To note, selecting the 'view' hyperlink under the GUS/Trader column allows the PII Manager to view the information of the GUS, including Market (BTEU or EBS), GFID, GUS/Trader ID, First Name and Last Name)

The 'PII Status: Not Approved' means there's no PII data associated with the relevant GUS/Trader. For those GUS/Trader(s) to be allowed to trade the CME Cash Markets MiFID Products, the Participants must submit the PII data.

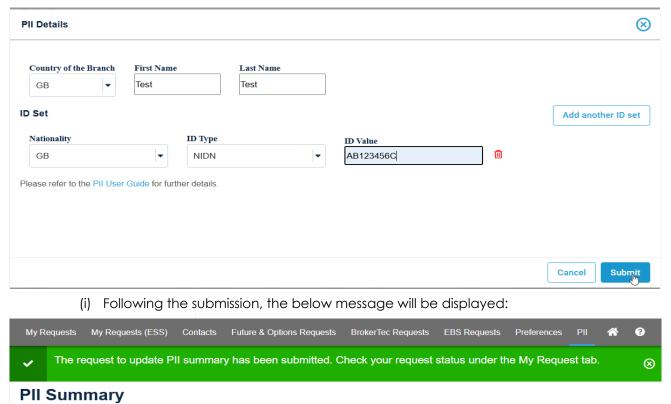
- (5) Once in the 'PII Details' screen, the PII Manager can start populating the required data:
 - (a) Select the Country of Branch from the dropdown list;
 - (b) Populate the First Name;
 - (c) Populate the Last Name;
 - (d) Click on the 'ADD ID set' button;





(h) Once complete, click on the 'Submit' button;





i ii Gaiiiiiai y

To check the status of the submission, Participants shall proceed as described in <u>Section 4.5</u>.

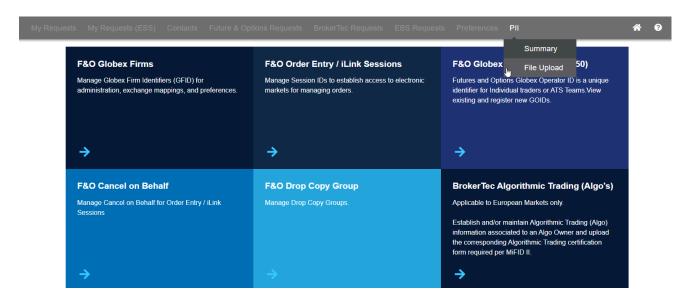
4.3.2 File (csv) upload

Participants can opt to use the **file (csv) upload** functionality to upload <u>multiple</u> PII data records, by completing the following steps:

(1) Select the 'PII Upload tab';

This screen allows the PII Manager to (i) download the blank template file (csv), and (ii) upload a file with multiple PII data records for the same LEI. The file enables the Participant to request addition of new PII records or the deletion of existing PII records.



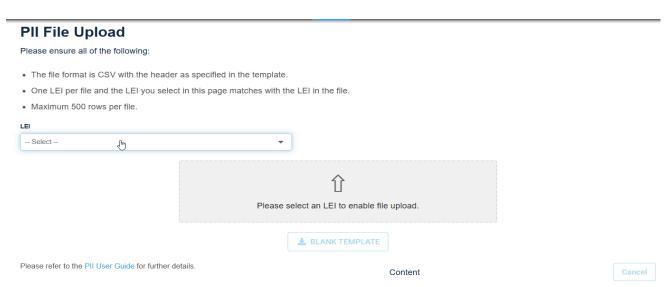


(2) Select the Legal Entity Identifier (LEI) from the dropdown list;

The dropdown displays a list of LEIs under which the PII Manager is registered.

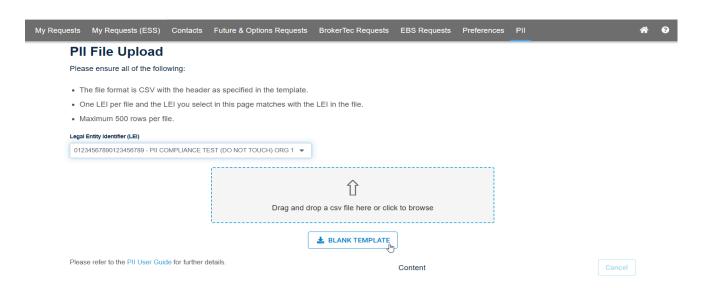
When uploading a file Participants shall ensure:

- the file format is CSV with the header as specified in the template (please don't remove the values in row 1);
- only one LEI is included per file, and the one populated should match with the LEI selected in the dropdown list;
- maximum 500 rows per file.



(3) After selecting the LEI, download the blank template file by clicking on the 'Blank Template' button;



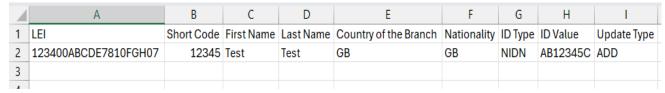


- (4) The blank template file contains the following columns (not to be removed / deleted):
 - (a) Participant's LEI;
 - (b) Short code;
 - (c) Country of Branch;
 - (d) First Name;
 - (e) Last Name;
 - (f) Nationality;
 - (g) ID Type;
 - (h) ID Value;
 - (i) Update Type;

	A	В	C	D	E	F	G	H		J
1	LEI	Short Code	First Name	Last Name	Country of th	Nationality	ID Type	ID Value	Update Type	
2										
3										
4										
5										
6										

- (5) Proceed to populate the required data in accordance with Section 3:
 - (a) Participant's LEI (only one LEI is allowed per file);
 - (b) Short code;
 - (c) First Name;
 - (d) Last Name;
 - (e) Country of Branch ISO 3166-1 alpha-2 (two-letter code);
 - (f) Nationality ISO 3166-1 alpha-2 (two-letter code);
 - (g) ID Type in accordance with the allowed types for the Nationality;
 - (h) ID Value corresponding to the ID Type;
 - (i) ADD or DELETE;



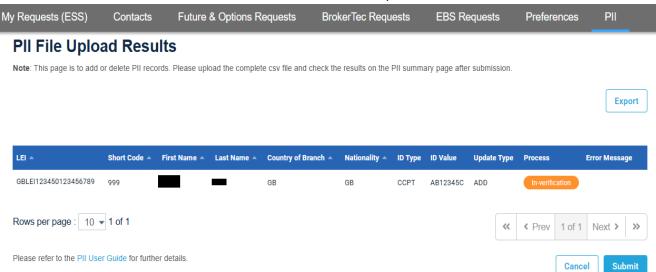


- (6) Upload the csv file';
- (7) Once uploaded, the 'PII File Upload Results' screen will display the summary of values for each data field from the uploaded file, the process status and the error messages, when applicable;

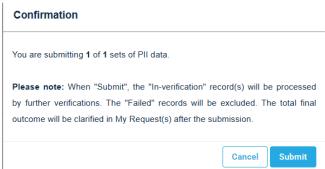
The file is initially validated to ensure all mandatory values are provided and meet the relevant data standards / format.

'Process' status:

- In-verification: the initial validation of the file didn't flag any errors and will be further processed after submission please refer to My Request for final details.
- Failed: the file contains errors please see error message column. If the records are submitted with a Failed status, they will be excluded.



(8) After review, click on the 'Submit' button. A confirmation message will appear immediately after clicking 'Submit' and will provide a summary of the PII data sets being submitted.



To check the status of the submission, Participants shall proceed as described in Section 4.5.



4.4 Error messages

The below contains a non-exhaustive list of error messages participants may encounter when submitting PII data:

Field	Error type	Error message(s)	Action required	
LEI (Legal	invalid value	Invalid Legal Entity Identifier (LEI) [_]. The LEI must match with [_]	Please ensure the LEI exactly matches with the LEI selected in the dropdown list.	
Entity Identification)			Please ensure to populate the LEI as detailed in <u>Section 3</u> of this guide.	
	missing value	The following required field is missing: LEI	detailed in <u>section s</u> of this golde.	
Short Code	invalid value	The short code at the LEI belongs to a different PII person. This short code is not used by any GUS/Trader.	Please ensure to populate the correct Short Code value associated with the GUS/Trader. If the Short Code populated in the submission is not used, please ensure to assign the Short Code to an existing GUS/Trader. Further details on the creation is available at Section 4.2 of this guide.	
	incorrect format	Invalid short code [_]. It must be a number between 1 and 10 digits long and cannot start with a zero.	Please ensure to populate the Short Code as detailed in <u>Section 3</u> of this	
	missing value	The following required field is missing: Short Code	guide.	
First Name	incorrect format	Invalid characters in first name [_]. Please use only letters and hyphens (-)	Please ensure to populate the First Name as detailed in <u>Section 3</u> of this	
riisi Name	missing value	The following required field is missing: First Name	guide.	
Land Manage	incorrect format	Invalid characters in first name [_]. Please use only letters and hyphens (-)	Please ensure to populate the Last Name as detailed in <u>Section 3</u> of th	
Last Name	missing value	The following required field is missing: Last Name	guide.	
Country of	invalid value / incorrect format	The country code ['_'] provided for the branch is invalid	Please ensure to populate the Country of Branch as detailed in	
Branch	missing value The following required field is missing: Country of the Branch		Section 3 of this guide. ISO 3166-1 alpha-2 (two-letter code). Use Uppercase as the value are case sensitive.	
	invalid value / incorrect format	The country code for nationality [_] is invalid	Please ensure to populate the Nationality as detailed in <u>Section 3</u> of this guide.	
Nationality	missing value	The following required field is missing: Nationality	ISO 3166-1 alpha-2 (two-letter code). Use Uppercase as the values are case sensitive.	
	invalid / incorrect format	The ID type [_] is invalid for the nationality [_]	Please ensure to use either CCPT, NIDN or CONCAT. No other values are accepted.	
ID Type	duplicated value	Duplicated ID Type for the Nationality. Please delete the existing one first.	To note, the system does not allow duplicated ID Types for the same Nationality (e.g. two CCPT for one	

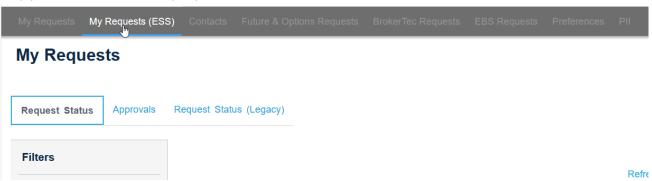


			Nationality). Please ensure to review and delete, if necessary, before submitting new records.
	missing value	The following required field is missing: ID Type	Please ensure to populate the ID Type as detailed in <u>Section 3</u> of this guide.
ID Value	incorrect format	The ID [_] for CCPT / NIDN can only contain letters and numbers. Invalid ID Value, for CONCAT value should begin with YYYYMMDD followed by 10 characters. Invalid ID length. The ID [_] for CONCAT must be exactly 18 characters long.	Please ensure to populate the ID Value as detailed in <u>Section 3</u> of this guide. Further details on CONCAT are explained in <u>Section 3.1.1</u>
	missing value	The following required field is missing: ID Value	
He dada Tana	Invalid value	Invalid update type [_]. Please use either 'ADD' or 'DELETE'.	Please ensure to use either ADD or DELETE. No other values are accepted.
Update Type	missing value	The following required field is missing: Update Type	Please ensure to populate the Update Type as detailed in <u>Section</u> 3 of this guide.

4.5 Reviewing the submission of PII data

To check the status and validation of the PII data submitted via the available methods through the CME Customer Center - Request Center (ESS), Participants shall complete the following steps:

(1) Select My Requests (ESS) to access the submitted records;



(2) Search the relevant record and click on the ID hyperlink;





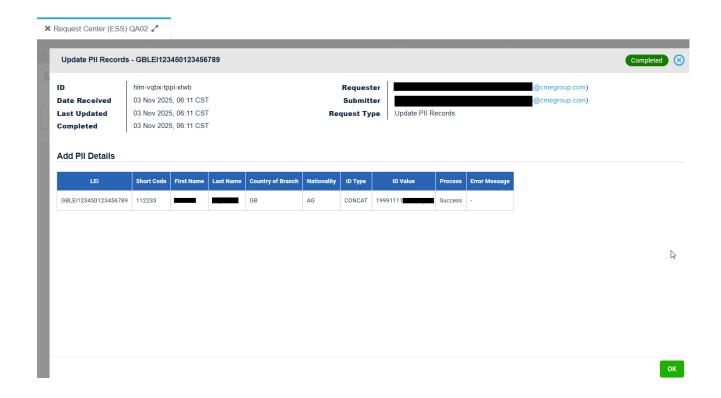
To note, this screen indicates the 'Status' of the request, but does not confirm whether the data validation has been successful or failed. Proceed to point (2) for details on the data validation status.

- 'Completed': indicates the request has been completed and requires participant to select on the request ID for further details on its data validation;
- 'In progress': indicates the request has not yet been completed. Please click on refresh until the status changes to 'Completed'.
- (3) The following screen will provide a summary of values for each data field from the manual submission or uploaded csv file, the process status and the error messages, when applicable.

The 'Process' status shows a summary of submitted data and indicates the records requested to be added under 'Add PII Details' and the records requested to be deleted under 'Delete PII Details':

- Success: the PII data record was submitted successfully;
- Failed: the PII data record failed validation the error message provides further details.





4.6 Request the deletion of PII data

To ensure the PII data is maintained up to date, Participants may request the deletion of PII data records via the two available methods through the CME Customer Center - Request Center (ESS).

When deleting the PII data records associated with a GUS/Trader, the Participant will disable the trading CME Cash Markets MiFID Products enabled at that GUS/Trader.

As set out in <u>Section 5</u> of this guide, after successfully requesting the deletion of PII data, the records will be kept for at least 5 (five) years to comply with regulatory obligations, after which time the data is deleted.

4.6.1 Manual (individual) - deletion

Proceeding as indicated in the steps (1) to (3) of <u>Section 4.3.1 Manual (individual) submission</u>, Participants may request the deletion of the PII data records associated with an individual GUS/Trader, as follows:

(1) To request the deletion of individual PII data for a GUS on the displayed list, select the 'Delete' button under Actions;





(2) Once 'Delete' is clicked, the below confirmation message will be displayed;

Are you sure you want to delete? Action: You are about to delete the last remaining PII data record for the short code. Immediate Impact: This action will disable all MiFID Products at the associated Global User Signature (GUS) /Trader. Recommendations: It is strongly recommended to perform this action outside of trading hours; If the associated GUS/Trader intends to continue trading MiFID Products, you will need to add new PII data records; Cancel Submit

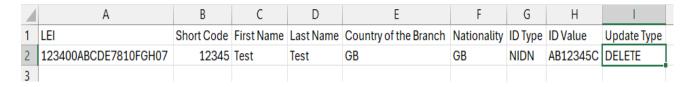
(3) Click the 'Submit' button;

To check the status of the request, Participants shall proceed as described in <u>Section 4.5</u>.

4.6.2 File (csv) upload - deletion

Proceeding as indicated in the steps (1) to (5)(h) of <u>Section 4.3.2 File (csv) upload</u>, Participants may request the deletion of the PII data records associated with multiple GUS/Trader, as follows:

(1) When populating the 'Update type' column within the csv file, please use DELETE to request the deletion of the PII data record;



- (2) Upload the csv file;
- (3) Review the 'PII File Upload Results' screen;
- (4) Click on the 'Submit' button.

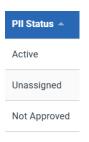
To check the status of the request, Participants shall proceed as described in <u>Section 4.5</u>.



4.7 Miscellaneous

This section provides definitions of the terminology used throughout the process.

• 'PII Status': the column at the PII - Summary tab displays the PII status of the GUS/Trader.



- "Active" means the GUS/Trader has active PII data linked to the Short Code.
- "Not Approved" means there's no PII data associated with the relevant GUS/Trader.
 For those GUS/Trader(s) to be allowed to trade the CME Cash Markets MiFID Products,
 the Participants must submit the PII data.
- "Unassigned" means the PII data was submitted for a natural person, but it is not assigned to an existing GUS/Trader. Participants may encounter the 'Unassigned' status following the removal of a Short Code associated with a GUS/Trader.

The 'Unassigned' PII data will be displayed at the PII - Summary tab for 6 (six) months since becoming unassigned. Following that period, the PII data will be removed and made unavailable for the Participant. As set out in <u>Section 5</u>, the PII data will be stored for 5 (five) years to comply with its regulatory obligations, after which time the data is deleted.

• 'Id Status': the column at the PII - Summary tab displays the status of the identifier associated with the nationality used in the submitted PII data.



- "EEA Venue Approved" means the identifier used was submitted in accordance with the priority levels required to trade on the EU trading venue(s), as set out in <u>Section</u> 3.1.
- "UK Venue Approved" means the identifier used was submitted in accordance with the priority levels required to trade on the UK trading venue(s), as set out in <u>Section</u> 3.1.
- "EEA & UK Venue Approved" means the identifier used was submitted in accordance with the priority levels required for both jurisdictions as set out in <u>Section 3.1</u> and <u>Section 3.1.2</u> of this guide.
- o if blank, it means no PII data has been submitted for the relevant GUS/Trader.



When a 'Warning' is displayed next to the "Approved" status, it means either the submitted First Name or Last Name does not exactly match with the First Name and Last Name of the GUS / Trader. To remediate the discrepancy, please ensure to correct the GUS details following the process set out in <u>Section 4.2</u>.

5. Data handling and Participant's rights

5.1 Participant Data Handling Disclaimer

The following applies to the use by the Trading Venues of the PII data provided in the NUF relating to the individuals named in it.

The Trading Venues collect and use the PII data for the purposes of compliance with its legal obligations, including under MiFID II and MIFIR. All personal information provided under this process will be used, distributed, and maintained in accordance with **CME Group's Privacy Notice** (http://www.cmegroup.com/privacy-policy.html).

The legal basis for the Trading Venues's collection and use of the PII data is that it is necessary for compliance with legal obligations. Provision of the PII data is, therefore, mandatory, and the Trading Venues may not be able to treat an individual as authorised to represent the participant if the PII data is not provided. The Trading Venues also also have a legitimate interest in collecting and using PII data for legal compliance purposes and in order to provide and manage services for its participants.

If completing this process on behalf of another individual, you will ensure that you have the required consent from those individuals to whom the PII data relates, or you satisfy an applicable legal basis for doing so, in compliance with all applicable laws, to enable CME Group to process such PII data.

The Trading Venues may share PII data provided with other members of its group of companies, with Regulators / National Competent Authorities and other regulatory and governmental authorities and with its service providers holding and processing the PII data on its behalf. Some of these disclosures may involve transfers of PII data to countries outside the European Economic Area, including countries which are not regarded as ensuring an adequate level of protection for information under applicable laws (such as those in the European Union). We put in place appropriate procedures and safeguards in accordance with applicable legal requirements when conducting such transfers. If you have any comments, questions or concerns about how we process your data, please contact **Privacy Compliance** at **Privacy@cmegroup.com**.

The PII data provided will be retained for as long as the relevant individual remains authorised to represent the participant before the Trading Venues or where required, in accordance with the internal records management and retention policies, as well as regulatory requirements such as MiFID II and MIFIR that may be applicable to us.

Pursuant to RTS 24, data relating to orders and transactions in financial instruments, and PII data is stored for at least 5 (five) years, after which time the data is deleted. Please see Section 14 of the



CME Group Privacy Notice for more information regarding Data Retention.

5.2 Participant's rights

In accordance with Section 10 of CME Group's Privacy Notice, participants have the right to request access to view the PII data and to request the deletion of the PII data. As noted above, the Trading Venues will still be required to keep the records for at least 5 (five) years to comply with its regulatory obligations. Please see Section 14 of CME Group's Privacy Notice for more information regarding Data Retention.

6. Contact Us

If you require assistance / support or have any questions, please get in touch by using the contacts available at: https://www.cmegroup.com/tools-information/contacts-list.html.

