



Connecting Identity.
Transforming Digital Business.

Legal Entity Reference Data (LE-RD): The Critical Need For Data Accuracy

The benefits to all stakeholders



RapidLEI™

Introduction

The way companies do business is continually evolving. The revolution of the Internet brought with it many positive changes and continues to re-shape both our personal and professional lives. Market competition can emanate from any geographical location on the planet, effectively removing many of the physical barriers to trade. Regulatory bodies continually evolve their requirements, sometimes simply to maintain sufficient enforcement, sometimes to completely re-engineer their scope and coverage. GDPR¹ which came into force in May 2018 is a prime example. It replaces the European focused 1995 Data Protection Directive (Directive 95/46/EC) with a global scope and penalties (and teeth) to match, protecting European citizens and safeguarding their personal data.

Lessons learned from the global financial crisis² a decade ago, have resulted in regulators imposing rules on business owners which also protect both individuals and other businesses from a potential repetition of events. Whilst data on Individuals is being protected/closed off, data on business is being made more accessible by all. Regulators are embracing the principles of the Open Data Charter³, increasing the level of Transparency for business entities. Legal Entity Reference Data (LE-RD) is Level 1 data – Who is who. The ownership structure is Level 2 data – Who owns whom. By mandating common data formats for these data sets backed by international standards such as the Legal Entity Identifier (LEI), regulators are building a defense in depth strategy. The increased availability of accurate data available to all stakeholders effectively crowd sources security as interested parties monitor trends. As we transition from a 'local' business number to a 'global' business number there remains a critical need for data accuracy when bridging/mapping between the old and the new.

Within this white paper, we'll touch on why a new standard was needed in the first place. Given the reliance many will have on the 'new' standard, we'll show the benefits to all stakeholders in ensuring high data quality for any Legal Entity Reference Data gathered from the 'old' systems as they will remain for many years if not in perpetuity.

The LEI Regulatory Oversight Committee (ROC) have published an exhaustive progress report⁴ on the success of the LEI program to date which provides a detailed overview of the LEI system. The paper highlights that:-

“AUTHORITIES IN JURISDICTIONS REPRESENTED ON THE ROC HAVE ADOPTED AT LEAST 91 REGULATORY ACTIONS USING THE LEI, WHICH ARE DESCRIBED IN THIS REPORT. THESE USES OF THE LEI CONTRIBUTE TO MANY G20 OBJECTIVES, IN LINE WITH THE INTENTION EXPRESSED BY THE G20 THAT THE LEI SHOULD SUPPORT AUTHORITIES AND MARKET PARTICIPANTS IN IDENTIFYING AND MANAGING FINANCIAL RISKS.”

Please see the following summary page for additional legislative/regulatory drivers for LEIs. <https://rapidlei.com/lei-regulation/>

THE LEGAL ENTITY IDENTIFIER (LEI)

WHAT IS AN LEI?

The LEI (Legal Entity Identifier) is a 20-digit, alpha-numeric code based on an international standard ISO 17442 primarily used to uniquely identify a Legal Entity (LE). The code is augmented by additional reference data in an XML Common Data Format (CDF) highlighting the business registry responsible for the formation/incorporation of the entity, alternative names, legal address(es), head quarter address(es) and local business number and name. More recently, many jurisdictions also comply with the ISO 20275 (Entity Legal Forms⁵ (ELF)) code system which removes the ambiguity inherent in freeform text based systems which include abbreviations. For example, H0PO (Hotel Zero Papa Oscar) is the 4-digit code for the United Kingdom’s Private Limited Company usually abbreviated to LTD or LTD. or ltd or ltd. but sometimes referred to as LIMITED or Limited.

WHY WAS IT NECESSARY TO START AGAIN?

“You can please some of the people some of the time, all of the people some of the time, some of the people all of the time, but you can never please all of the people all of the time. ”, is attributed to Poet John Lydgate and made famous by Abraham Lincoln. It can be applied to many situations involving diverse and disparate communities. A change in direction, towards a common goal, can be enforced, or achieved through consensus, but sometimes it’s necessary simply to start again. The changes required to meet the goal are either too great or simply not possible.

As was the case with the Global Legal Entity Identifier System (GLEIS), the LEI ROC⁶ identified the need to start again, creating an umbrella numbering system covering all jurisdictions as well as the governance rules to maintain it. The Global LEI Foundation (GLEIF⁷) was created to manage the eco system, LEI issuers and outreach to stakeholders. The GLIEF have identified and

enumerated 650+ Registration Authorities⁸ globally who together offer a multitude of alternative business numbering and naming conventions. Numbers are allocated to businesses, individuals, communities, funds and many other unique groupings within their respective jurisdictions. It was simply not possible to move towards a common standard for all. Instead, the concept of an LEI Issuer (Previously known as a Local Operating Unit) was devised. LEI issuers are responsible for mapping the existing (old) numbering systems to a unique global LEI (new) standard and maintaining the LEI through its lifecycle.

WHERE TO LOOK FOR GOOD QUALITY DATA?

One of the most obvious failings of the non-homogenous business registry system prior to the LEI's inception and GLEIF's formation of the RA list was the lack of a central database of business registers. Just as business formation rules vary widely⁹ both in terms of price, speed of incorporation annual reporting requirements and the use of electronic submission process, so to do the services offered to search for business information. In some case the registry may even block internet traffic from outside of their country to the detriment of businesses located within their jurisdiction who then fail simple KYC (Know Your Customer) checks.

The Florida Department of Corporations operates from the URL <http://www.sunbiz.org/> which redirects to <http://dos.myflorida.com/sunbiz/search/>. Whilst the URL is an apt choice for the US sunshine state, it may seem unlikely to many as the official repository. Prior to the authoritative RA list now mandatory for any new LEI, there existed an opportunity to commit KYC fraud by purchasing a sound alike domain with combinations of 'company' or 'business' or 'registry'.

Not all data is free to access. Each Business Registry offers a varying level of data quality for free. Additional data is sometimes available through paid extracts which may optionally be digitally signed by the registry as proof of authenticity. Some jurisdictions even charge to confirm whether the business is in good standing.

This extremely convoluted business identity eco system is therefore very hard to traverse for the hardened identity assurance specialist, never mind the casual user dabbling in KYC. The GLEIS now offers a single place to be listed, effectively a single global business register - benefiting all stakeholders via the Open Data Charter nature of the Level 1 and Level 2 data sets. As more regulators see the benefits of mandating the use of the LEI, so too will the demand for LEIs

increase.

WHAT'S IN A NAME?

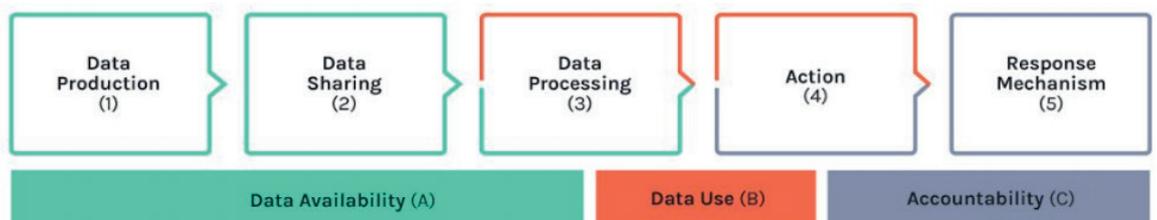
Business names are key business assets protected extensively by laws and regulations especially where the business name equates to a recognized brand. Many business registers offer guidance around name choice to avoid potential clashes with existing established businesses, however the rules and advice does not necessarily apply globally and similarly named companies may already exist in other jurisdictions. It's therefore vital that the exact company name, including abbreviations, capitalization and special characters are always used fully and completely in all official documentation and especially within an LEI.

IMPLICATIONS OF AN OPEN DATA SYSTEM SUCH AS THE GLEIS

The benefits of an Open Data Charter system such as the GLEIS are many and therefore outside the scope of this white paper to cover. McKinsey & Company offer some advice to executives¹⁰. Avoiding GIGO¹¹ is essential. LE-RD, especially company names and company numbers must be accurate from the get go, as current and future automated systems consume the open data and may themselves become open platforms effectively propagating any inaccuracies deeper into the eco system.

Liz Carolan's 2017 paper¹² on "Mapping open data for accountability" proposes a suggested framework for understanding the Open Data workflow. In this model the LEI Issuer has a responsibility to maintain accuracy through stages (3) and (4) to Data obtained (or verified) from the Business Registry in stage (1).

Once the LEI is created the LE-RD is available through the GLEIS who then take over from stage (2) and so the pattern cycles through all layers and stakeholders.



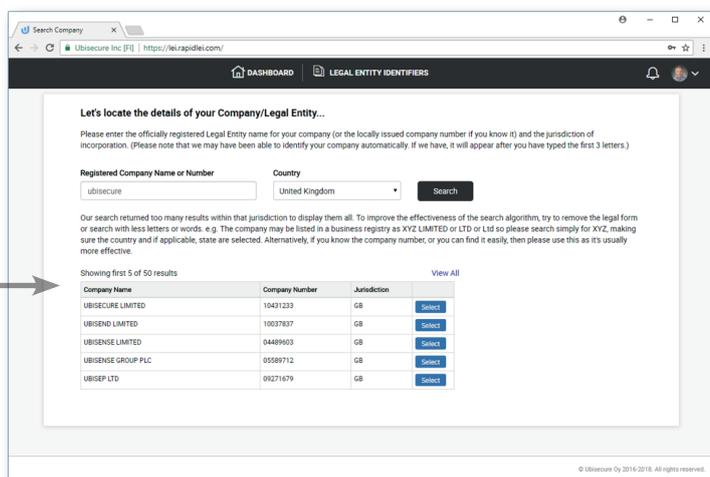
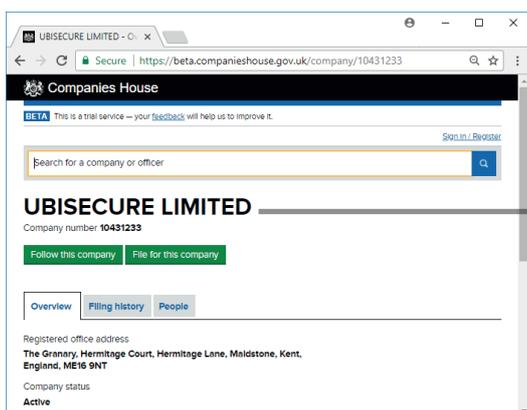
HOW TO ENSURE DATA ACCURACY

Ubisecure's **RapidLEI** Identity Platform features several industry leading workflow processes which although extremely simple in concept, ultimately deliver greater accuracy, efficiency and speed. Here's how and why these work in practice.

START AS YOU MEAN TO GO ON...

Many LEI issuers start the LEI application process with a blank form. Not only can this be daunting in that the form expects the Applicant to be aware of all details needed to apply for an LEI, but a blank form needs to be completed, checked, corrected, checked again and processed. Each of these processing steps takes up valuable time for the LEI Issuer and the Applicant leading to lower efficiency levels especially where multiple LEIs are required.

The second disadvantage of starting with a blank form is a higher potential for manual/keying errors during data entry. As we already touched on earlier, it is especially important to ensure the correct company name, company number and jurisdiction of incorporation of the Legal Entity are correct from the get-go. Most, if not all Business Registries can be contacted in real time to obtain this basic information avoiding GIGO. This also solves caPitAlizatiON issues and removes ambiguity on the Legal form. Not all jurisdictions record the Legal Form as a component of the Legal Name. In the example below where we are looking to obtain an LEI for the UK based group company which owns Ubisecure Oy. Many LEI Issuers, banks, Certification Authorities and others performing KYC, would accept Ubisecure Ltd, UBISECURE LTD, Ubisecure Limited. The actual UK Companies House format of **UBISECURE LIMITED** is the only Alternative names are presented (In the example below, up to 50) to remove the opportunity for spelling errors affecting the choice of name.



Pressing 'Select' performs an essential 'Duplicate' check to ensure that no LEI already exists within the GLEIS. Accurate naming improves the success rate for this check for all parties. As of March 2018, there were 2,700 duplicates accidentally created, all of which had to be cancelled.

I'VE STARTED SO I'LL FINISH...

We've already seen the advantage in starting the process with correct data for the **Legal Name** (Company Name) and **Registration Authority Entity Id** (Company Number). This now reaps rewards through the rest of the system as data can be obtained directly from the Business Registry in real time to complete the application.

Entity Legal Forms (4 Digit ELF codes) compliant to ISO 20275 are automatically selected. The form will either have: -

- The ELF code - Text based Description of the Legal Form (as shown opposite)
- 8888 - Description (If no ELF code exists for that specific legal form)
- 9999 - Description (If the Jurisdiction does not yet support the standard)

The RapidLEI system uses sophisticated algorithms to parse the data available from the appropriate Business Registry.

Best practice replaces 'Country' or 'State/Region' with their appropriate ISO 3166-1 or -2 codes.

Not all Business Registry's offer address information on Headquarters Addresses so natural break points are added to the process to allow for additional data to be provided.

Various methods are employed to obtain the data. Many jurisdictions offer direct API access models leveraging a small charge for the consumption of data in structured formats such as JSON. Some Business Registries such as Austria outsource the API provision services to third parties. Other techniques are used by the RapidLEI system to ensure to data is accurate throughout the application process and the final verification process mandated by the GLEIF of an LEI issuer.

TODAY MY LE-RD IS ACCURATE, BUT WHAT ABOUT TOMORROW?

LEI's are effectively persistent identifiers, lasting as long as any Legal Entity to which it is mapped - once issued, the LEI itself is never altered. It is the underlying Level 1 Legal Entity Reference Data, Level 2 Relationship Records and/or Exception Records and the status of the LEI which change throughout the lifetime of the LEI.

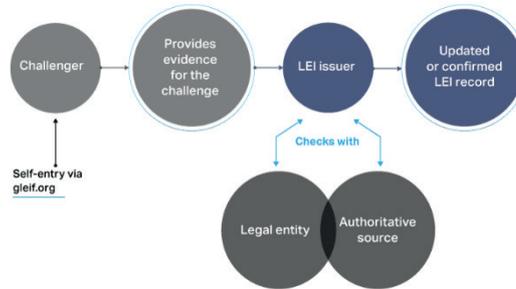
An LEI is initially allocated an **ISSUED** status, indicating to all stakeholders that the LEI, and all underlying records have been issued in accordance with the requirements of the Global LEI System and are valid for a 12-month period from the point those checks were made. Assuming nothing changes with the Legal Entity's company structure or reference data and it legally exists, the LEI can ordinarily be renewed to last another 12 months. If this does not happen in time and the expiry date passes without revalidation, then the LEI moves to the status of **LAPSED**. This status does not indicate that the LEI itself is NULL and VOID or that the Legal Entity has expired – but it may have. This uncertainty is now in the spotlight. i.e. regulators¹³ are seeing the LASED status as a potential red flag on accuracy and timeliness of data are therefore modifying their guidelines, not only to mandate the use of the LEI, but also to ensure when it is used, that it maintains a status of ISSUED¹⁴.

Note: Other status indicators such as **RETIRED / DUPLICATE** etc. are outside the general scope of this white paper but covered within the glossary section.

RAPIDLEI'S CHALLENGE/AMENDMENT PROCESS FOR LE-RD

We've already highlighted the importance of accuracy from the get-go, but accuracy of the LE-RD throughout the lifecycle of the LEI is equally, if not more important. Assuming the Legal Entity is aware of the changes, they are the primary source of information to correct any inaccuracies or highlight any changes.

A secondary source is RapidLEI itself. Periodic reviews of the entity status are performed outside of the annual cycle. R&D around enhanced reporting algorithms should allow these checks to be reported quarterly or even monthly/weekly. This will be the subject of a future white paper.



The ternary and final source of information highlighting change is the community of stakeholders involved/invested in the use of the LE-RD. A feedback program known as the 'Challenge' process has been initiated by the GLEIF. At the base of each record within the GLEIF repository, a challenge form is available to allow any changes or inaccuracies to be reported as shown opposite. The challenge process is public and is highlighted on <https://www.gleif.org/en/lei-data/challenge-lei-data>. On receipt of a challenge, RapidLEI will verify via an authoritative source and correct any errors within the LE-RD.

Conclusion

Regardless of whether the need to obtain an LEI is driven by regulation or choice, the accuracy of the underlying data, which will ultimately be consumed by multiple relying parties, needs to be assured throughout the lifecycle of the LEI. It's therefore beneficial to both the Applicant and the LEI issuer to work together to ensure this goal is met. Choosing an LEI issuer who employs processes and techniques to build in accuracy from the very start of the process, saves time, avoids bad data being created and therefore the unnecessary workload associated with any challenges¹⁵ to the accuracy of the data.

Find out more at www.rapidlei.com

Notes

1 The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) is a regulation by which the European Parliament, the Council of the European Union, and the European Commission intend to strengthen and unify data protection for all individuals within the European Union (EU). More details on solutions to mitigate the impact of GDPR can be seen here <https://www.ubisecure.com/solutions/gdpr-data-protection-officers/>

2 “The financial crisis of 2007–2008, also known as the global financial crisis and the 2008 financial crisis, is considered by many economists to have been the worst financial crisis since the Great Depression of the 1930s” https://en.wikipedia.org/wiki/Financial_crisis_of_2007%E2%80%932008

3 <https://opendatacharter.net/> - “Mission : The overarching goal is to foster greater coherence and collaboration for the increased adoption and implementation of shared open data principles, standards and good practices across sectors around the world.”

4 https://www.leiroc.org/publications/gls/roc_20180502-1.pdf - “The Global LEI System and regulatory uses of the LEI”

Sources

5 GLEIF Entity Legal Form List <https://www.gleif.org/en/about-lei/iso-20275-entity-legal-forms-code-list>

6 The Regulatory Oversight Committee (ROC) is a group of 71 public authorities with full membership and 19 observers from more than 50 countries established in January 2013 to coordinate and oversee a worldwide framework of legal entity identification, the Global LEI System. <https://www.leiroc.org/>

7 Established by the Financial Stability Board in June 2014, the Global Legal Entity Identifier Foundation (GLEIF) is tasked to support the implementation and use of the Legal Entity Identifier (LEI). The foundation is backed and overseen by the LEI Regulatory Oversight Committee, representing public authorities from around the globe that have come together to jointly drive forward transparency within the global financial markets. GLEIF is a supra-national not-for-profit organization headquartered in Basel, Switzerland. - <https://www.gleif.org/en/about/this-is-gleif>

8 GLEIF Registration Authority List <https://www.gleif.org/en/about-lei/gleif-registration-authorities-list>

9 The European Commerce Registers Forum offers a global benchmarking survey on registry processes <http://www.ecrforum.org/registry-bench-marking/>

10 <https://www.mckinsey.com/industries/high-tech/our-insights/what-executives-should-know-about-open-data>

11 https://en.wikipedia.org/wiki/Garbage_in,_garbage_out

12 <http://www.transparency-initiative.org/wp-content/>

[uploads/2017/06/taiodc_draft_data4accountabilityframework.pdf](https://www.esma.europa.eu/system/files/2015-1485_qa_xiv_on_emir_implementation_october_2015.pdf)

13 Please see https://www.leiroc.org/publications/gls/roc_20180502-1.pdf (page 39) for this Footnote

“For example, concerning the reporting of derivatives in the European Union, ESMA specifies in its Trade Repositories (TR) Q&A 10(b) that counterparties shall identify themselves in EMIR reports with an LEI issued and duly renewed and maintained according to the terms of any of the endorsed LOU of the GLEIS (see http://www.esma.europa.eu/system/files/2015-1485_qa_xiv_on_emir_implementation_october_2015.pdf p. 67-68). In addition, according to ESMA TR Q&A 20b, the EU Trade Repositories supervised by ESMA are instructed to validate the LEIs in the EMIR reports, this includes not only format validations (based on the character length) but also content validations against the GLEIF database to ensure that the code reported is included in the database. In the specific case of the LEI of the reporting counterparty/ delegated reporting entity, the TRs are requested to check that the code used is a valid and duly maintained LEI, in other words the registration status of a given LEI cannot be “lapsed” due to lack of payment of the maintenance fee. TRs should reject the reports that fail their validation checks prescribed in the Q&A. (see http://www.esma.europa.eu/system/files/2015-1485_qa_xiv_on_emir_implementation_october_2015.pdf , p. 78-79).

However, the rules governing the reporting to the CFTC allows an entity to report a lapsed LEI, and unless the entity’s LEI reference data has changed, does not require an entity to annually renew its LEI: § 45.6(e)(1) of Title 17 of the Code of Federal Regulations (Reporting of level one reference data) states the following: “All subsequent changes and corrections to level one reference data previously reported shall be reported to issuer, by means of self-registration, third-party registration, or both, as soon as technologically practicable following occurrence of any such change or discovery of the need for a correction.” Issuer here is the LEI utility that has issued the LEI (meaning LOU).

14 An LEI with a registration status “pending_archival” may also be considered as current when the same LEI is not published with an “issued” registration status by another LOU, which may happen in rare cases. The “pending_archival” status means that an LEI has been ported to a different LOU, which is about to publish it as “issued”, with potentially more current reference data.

15 <https://www.gleif.org/en/lei-data/challenge-lei-data>

Glossary of Terms

These terms are either used in this white paper, within the messaging on the RapidLEI system or within the Terms and Conditions of supply of an LEI. Please consult the RapidLEI website for any updated definitions.

Term	Definition
Accounting Practitioner	A certified public accountant, chartered accountant, or a person with an equivalent license within the country of the Applicant's Jurisdiction of Incorporation or Registration or any jurisdiction where the Applicant maintains an office or physical facility; provided that an accounting standards body in the jurisdiction maintains full (not "suspended" or "associate") membership status with the International Federation of Accountants.
ASCII Transliterated	Where non-roman characters are changed to an ASCII equivalent. e.g. à ã ä å will be transliterated to a
Branch Office	A branch office is a lead international branch or international branch network outside of the Head Office's jurisdiction. An international branch, as defined here, is legally dependent on the head office legal entity and cannot exist without its head office legal entity
Business Rule	GLEIF's legal, organizational and technical rules for implementation of the LEI-ROC's high-level policies for Level 2 data.
Challenge	A mechanism co-ordinated by the GLEIF to allow data accuracy to be challenged and therefore improved by all stakeholders. See https://www.gleif.org/en/lei-data/challenge-lei-data
City/Town	Within the LE-RD data this is the name of the City where the Legal Entity is registered.
Common Data Format (CDF)	https://www.gleif.org/en/about-lei/common-data-file-format/lei-cdf-format
Confirmation Request	An appropriate out-of-band communication requesting verification or confirmation of the particular fact at issue.
Confirming Person	A position within an Applicant's organisation that confirms the particular fact at issue.
Contract Signer	A natural person who is either the Applicant, employed by the Applicant, or an authorised agent who has express authority to represent the Applicant, and who has authority on behalf of the Applicant to sign a Contract.
Country	The country of the entity's Legal Address or Headquarters Address. Expressed as an ISO 3166-1 code such as US or FR
Demand Deposit Account	A deposit account held at a bank or other financial institution, the funds deposited in which are payable on demand. The primary purpose of demand accounts is to facilitate cashless payments by means of check, bank draft, direct debit, electronic funds transfer, etc. Usage varies among countries, but a demand deposit account is commonly known as a share draft account, a current account, or a checking account.
Direct Parent	The Direct Parent, or "direct accounting consolidated parent" is defined as the lowest level legal entity preparing consolidated financial statements for the entity. For more information, please refer to the LEI ROC publication "Collecting Data on Direct and Ultimate Parents of Legal Entities in the Global LEI System" on https://www.leiroc.org/publications/gls/lou_20161003-1.pdf
Duplicate	When an LEI is issued which contains LE-RD data which refers to a Legal Entity which already has this same data referenced, the latest LEI is identified as the duplicate and should not be used. The record is ordinarily updated by RapidLEI to point to the correct (initial) LEI.
Entity Legal Form	In the context of a Legal Entity, the legal form in the Jurisdiction of Incorporation under which the Legal Existence of the entity is categorised (e.g. Limited Liability Company or Public Company).
Entity Legal Status	In the context of a Legal Entity, the status in the Jurisdiction of Incorporation under which the Legal Existence of the entity status is categorised (e.g. Active or Dissolved).
External Relationship Record	Relationship Record created by an LOU when parent company has an LEI. This file is intended for publication to all participants in the Global LEI System
Head Office	Usually the International office of a group of companies or the main office in any one country with multiple offices in different countries.
Headquarters Address	The physical address of the headquarters of the Legal Entity which may also be the same as the Legal Address
Guideline	A collection of procedural specific suggestions for best practice.
Incorporating Agency	In the context of a Legal Entity, the government agency in the Jurisdiction of Incorporation under whose authority the legal existence of the entity is registered (e.g., the government agency that issues certificates of formation or incorporation). In the context of a Government Entity, the entity that enacts law, regulations, or decrees establishing the legal existence of Government Entities.

Term	Definition
Independent Confirmation From Applicant	Confirmation of a particular fact received by the LOU pursuant to the provisions of the GLEIF rules and LOU service provisions or binding upon the Applicant.
Individual	A natural person and therefore unable to obtain an LEI.
Internal Relationship Record	Relationship Record created by an LOU for internal exchange with GLEIF and the LEI ROC (including the PNI data element).
International Organisation	An organisation founded by a constituent document, e.g., a charter, treaty, convention or similar document, signed by, or on behalf of, a minimum of two Sovereign State governments.
Jurisdiction of Incorporation	In the context of a Legal Entity, the country and (where applicable) the state or province or locality where the organisation's legal existence was established by a filing with (or an act of) an appropriate government agency or entity (e.g., where it was incorporated). In the context of a Government Entity, the country and (where applicable) the state or province where the Entity's legal existence was created by law
LEI Record	An XML data record in LEI-CDF format describing one legal entity. See
Latin Notary	A person with legal training whose commission under applicable law not only includes authority to authenticate the execution of a signature on a document but also responsibility for the correctness and content of the document. A Latin Notary is sometimes referred to as a Civil Law Notary.
Last Update Date	The date on which the information within the record was most recently updated by the Managing LOU
Legal Address	The official address of a company, as recorded with the Incorporating Agency, to which official documents are sent and at which legal notices are received.
Legal Entity	An association, corporation, partnership, proprietorship, trust, or individual that has legal standing in the eyes of law. A legal entity has legal capacity to enter into agreements or contracts, assume obligations, incur and pay debts, sue and be sued, and to be held responsible for its actions.
Legal Entity - Other Names	Alternative past and present names under which the Legal Entity is registered by the Registration Authority in the Jurisdiction of Incorporation
Legal Entity - Reference Data	Presented within a Common Data Format (CDF) structure Legal Entity Reference Data (LE-RD) covers items such as Legal Entity Form, Legal Entity Status, Legal Name and Legal Entity Address.
Legal Entity - Relationship Record	Relationship Record - CDF (RR-CDF) format - defines how Level 2 data, i.e. information on 'who owns whom', is reported for LEI registrants whose direct and ultimate parents have an LEI.
Legal Existence	A Legal Entity has Legal Existence if it has been validly formed and not otherwise terminated, dissolved, or abandoned.
Legal Practitioner	A person who is either a lawyer or a Latin Notary and competent to render an opinion on factual claims of the Applicant.
Maintenance	A generic term used by LOUs to cover the amendment of LEI data and the annual renewals.
Managing LOU / LEI Issuer	The LOU which manages and maintains the data of an LEI.
Non-LEI parent	A (direct or ultimate) consolidated accounting parent according to the applicable accounting rules, which therefore must be reported, but does not yet have an LEI. - See Provisional Node Identifier (PNI)
Notary	A person whose commission under applicable law includes authority to authenticate the execution of a signature on a document.
Opt-Out Reason	<p>No LEI: The parent does not consent to have an LEI, or the relationship is not yet known, or a relationship is not yet defined due to the absence of a parental LEI.</p> <p>Natural Persons: There is no parent according to the definition used, because the entity is controlled by natural person(s) without any intermediate legal entity meeting the definition of accounting consolidating parent.</p> <p>Non Consolidating: There is no parent according to the definition used, because the entity is controlled by legal entities not subject to preparing consolidated financial statements.</p> <p>No Known Person: There is no parent according to the definition used, because there is no known person controlling the entity (e.g., diversified shareholding).</p>

Term	Definition
	<p>Legal Obstacles: Obstacles in the laws or regulations of a jurisdiction prevent providing or publishing this information.</p> <p>Consent Not Obtained: The consent of the parent was necessary under the applicable legal framework and the parent did not consent or could not be contacted.</p> <p>Binding Legal Commitments: Binding legal commitments (other than the laws or regulations of a jurisdiction), such as articles governing the legal entity or a contract, prevent providing or publishing this information.</p> <p>Detriment Not Excluded: The child entity has sought to consult the parent entity about the reporting of the parent information but could not confirm the absence of detriment in a way that can appropriately prevent liability risks for the child entity.</p> <p>Disclosure Detrimental: The disclosure of this information would be detrimental to the legal entity or the relevant parent. This will include reasons generally accepted by public authorities in similar circumstances, based on a declaration by the entity.</p>
Order Status (RapidLEI Portal)	<p>The status of the order within the RapidLEI ordering system:</p> <p>To Be Renewed - A list of LEIs ready to be renewed. Taking action early avoids the possibility of an LEI record accidentally falling into a LAPSED status and potentially becoming invalid for transacting and reporting.</p> <p>Lapsed - A list of LEIs) which have now LAPSED</p> <p>Pending - A list of LEI(s) where RapidLEI have completed tasks and need the Applicant to resume the application by clicking the blue 'Actions' button.</p> <p>Awaiting Signature - A list of LEI(s) requiring an eSignature on the contract. Clicking on the blue 'Actions' button initiates the signing process.</p> <p>Declined - The signing of the contract which is mandatory for issuance of an LEI was declined by the Signing Authority.</p> <p>In Progress - The Rapid LEI team is progressing with these LEI orders.</p> <p>Issued - Lists all the LEIs with a status of ISSUED</p> <p>LEI Transferred - Lists all the LEIs (if any) which have been transferred to another LOU for maintenance.</p> <p>Import in progress - The Rapid LEI team is progressing with the import of these LEIs.</p> <p>Partially Renewed - We've completed the renewal process so there's nothing more to do. LEI's remain issued and once the annual anniversary date passes the LEI will be re-issued for another full year. You can modify the date selector on the front page to see if there are any LEIs which are due to LAPSE in the next 45, 30 or 15 days. Renewing early is a practical solution to avoid an accidental LAPSE of your LEI.</p> <p>Duplicate - This is a list of LEIs (if any) which have been accidentally DUPLICATED. These LEIs are NOT the surviving LEIs so the LEI code should not be used - It is for reference only.</p> <p>Merged - This is a list of LEIs (if any) which relates to Legal Entities that have been merged into other entities. The LEI code should not be used - It is for reference only.</p> <p>Retired - This is a list of LEIs (if any) which relate to Legal Entities that have ceased to operate. The LEI code should not be used - It is for reference only.</p> <p>Annulled - This is a list of LEIs (if any) which have been ANNULLED, having been created and later determined to be in error. The LEI code should not be used - It is for reference only.</p> <p>Ready To Publish - These LEI(s) are ready to be published to the GLEIS. There is a limit of 10 publications a day for each LOU, so please allow up to 144 minutes + a further 24 hours to elapse before all parties can see the updates (24 hours as the GLEIF concatenated files are published daily)</p> <p>Cancelled - LEI applications which have been CANCELLED part way through the process.</p>
Parent Reference Data Record	Reference Data associated with the PNIs reported in the Internal Relationship Record. This is created by the LOU for internal exchange with GLEIF and the LEI ROC.
Postal Code	A Postal, ZIP, or PIN Code which is the legal Postal Code of the entity's Legal Address or Headquarters Address.
Provisional Node Identifier (PNI)	A code conforming to the technical standards (without reference data) of ISO 17442 and with a separate prefix not assigned to any LOU for LEI issuance.

Term	Definition
Qualified Government Information Source (QGIS)	A Qualified Government Information Source (QGIS) is a regularly-updated and current, publicly available, database designed for the purpose of accurately providing the information for which it is consulted, and which is generally recognised as a dependable source of such information provided that it is maintained by a Government Entity, the reporting of data is required by law, and false or misleading reporting is punishable with criminal or civil penalties
Qualified Government Tax Information Source (QGTIS)	A Qualified Government Tax Information Source is a Qualified Government Information Source that specifically contains tax information relating to Legal Entities or Individuals (e.g., the IRS in the United States).
Qualified Independent Information Source (QIIS)	A Qualified Independent Information Source (QIIS) is a regularly-updated and publicly available database that is generally recognised as a dependable source for certain information. A database qualifies as a QIIS if:
	1. Industries other than the LOU industry rely on the database for accurate location, contact, or other information; and
	2. The database provider updates its data on at least an annual basis.
Reference Data	The entity description and registration information (where applicable) associated with an LEI or PNI (could be an LEI-CDF record or a record in the provisional "Parent Reference Data format").
Registration Authority	A Governmental Agency that registers business information in connection with an entity's business formation or authorisation to conduct business under a license, charter or other certification. A Registration Authority MAY include, but is not limited to (i) a State Department of Corporations or a Secretary of State; (ii) a licensing agency, such as a State Department of Insurance; or (iii) a chartering agency, such as a state office or department of financial regulation, banking or finance, or a federal agency such as the Office of the Comptroller of the Currency or Office of Thrift Supervision.
Registration Authority ID	A Code provided by the Global LEI Foundation to represent the Registration Authority. See https://www.gleif.org/en/about-lei/gleif-registration-authorities-list
Registered Agent	An individual or entity that is: (i) authorised by the Applicant to receive service of process and business communications on behalf of the Applicant; and (ii) listed in the official records of the Applicant's Jurisdiction of Incorporation as acting in the role specified in (i)
Registered Company Name / Legal Name	The name assigned to the Legal Entity by the Incorporating Agency in such entity's Jurisdiction of Incorporation.
Registered Company Number / Registration Authority Entity Id	The number assigned to a Legal Entity by the Incorporating Agency in such entity's Jurisdiction of Incorporation.
Registration Status (LEI)	<p>The status of the LEI record as recorded by the GLEIF and presented within the public CDF record:</p> <p>ISSUED - The LEI registration has been validated and issued.</p> <p>LAPSED - The LEI registration has not been renewed by its Next Renewal Date, and is not known by public sources to have ceased operation.</p> <p>MERGED - The LEI registration for the entity has been merged into another legal entity, such that this legal entity no longer exists as an operating entity.</p> <p>RETIRED - The LEI registration for the entity has ceased operation, without being merged into another entity.</p> <p>DUPLICATE - The LEI registration has been determined to be a duplicate of another LEI Registration; the DUPLICATE status is assigned to the non-surviving registration (i.e. the LEI that should no longer be used).</p> <p>TRANSFERRED - An LEI registration that has been transferred to a different managing LOU.</p> <p>PENDING_TRANSFER - An LEI registration requested to be transferred to another LOU. The request is being processed at the sending LOU.</p> <p>PENDING_ARCHIVAL - An LEI registration is about to be transferred to a different LOU, after which its registration status will revert to a non-pending status.</p> <p>ANNULLED - An LEI registration that was marked as erroneous or invalid after it was issued.</p> <p>CANCELLED - An LEI registration that was abandoned prior to issuance of an LEI.</p>
Regulated Financial Institution	A financial institution that is regulated, supervised, and examined by governmental, national, state or provincial, or local authorities

Term	Definition
Relationship Record (RR)	An XML data record in RR-CDF format detailing one relationship between two legal entities, as reported by (initially) the child entity to their LOU, and by the LOU to GLEIF.
Receiving LOU	LOU that will become the Managing LOU
Reporting Exceptions Record	No Relationship Record but "Exception Reason" recorded.
Sending LOU	Current Managing LOU, which will transfer management to the Receiving LOU.
Standard	A collection of procedural-specific requirements that must be met by everyone.
State/Region	The state, prefecture, province, or administrative jurisdiction of the entity's Legal Address or Headquarters Address. Expressed as an ISO 3166-2 code such as US-CA for California
Transfer Objection Form	Formal document provided by Sending LOUs to gather all required information in case a Legal Entity objects to the transfer request –see details in chapter 1.
Transfer Request Form	Formal document provided by Receiving LOUs to gather all required information for an LEI transfer – see details in chapter 1.
Transition Rule	A rule stipulating what LOUs, GLEIF and legal entities must do when a relationship record changes from one allowed state to another.
Translator	An individual or Business Entity that possesses the requisite knowledge and expertise to accurately translate the words of a document written in one language to the native language of the LOU
Ultimate Parent	The Ultimate Parent, or "ultimate accounting consolidating parent," is defined as the highest level legal entity preparing consolidated financial statements for the entity. For more information, please refer to the LEI ROC publication "Collecting Data on Direct and Ultimate Parents of Legal Entities in the Global LEI System" on https://www.leiroc.org/publications/gls/lou_20161003-1.pdf
Use Case	A specific operation scenario which applies one or more Business Rules.
Validation Authority	The primary registration authority used by the LOU to validate the entity data.
Validation Authority ID	The reference code of the registration authority, taken from the Registration Authorities List which is maintained by the GLEIF.
Validation Sources	<p>The level of validation of the reference data provided by the registrant. Possible values for this field are:</p> <p>FULLY_CORROBORATED - Based on the validation procedures in use by the LOU responsible for the record, there is sufficient information contained in authoritative public sources to corroborate the information that the submitter has provided for the record.</p> <p>PARTIALLY_CORROBORATED - Based on the validation procedures in use by the LOU responsible for the record, the information supplied by the registrant can be partially corroborated by public authoritative sources, while some of the record is dependent upon the information that the registrant submitted, either due to conflicts with authoritative information, or due to data unavailability.</p> <p>ENTITY_SUPPLIED_ONLY - Based on the validation procedures in use by the LOU responsible for the record, the information associated with this record has significant reliance on the information that a submitter provided due to the unavailability of corroborating information.</p> <p>PENDING - The validation of the reference data provided by the registrant has not yet occurred.</p>
Verified Method of Communication	The use of a telephone number, a fax number, an email address, or postal delivery address, confirmed by the LOU as a reliable way of communicating with the Applicant.
Verified Professional Letter	A Verified Accountant Letter or Verified Legal Opinion

About Ubisecure & RapidLEI



Ubisecure is a global Identity & Access Management software and cloud services provider specializing in Customer IAM (CIAM). Ubisecure technology makes using online identities easier, safer and more private for consumers. It helps businesses improve user experience and reduce costs through increased customer engagement, loyalty and insight and it helps service providers benefit from simplified registration, login and attribute sharing from the rich identities already being used online. It helps create trusted connections between digital services, devices and mobile identity. When these modern aspects of identity management are combined, Ubisecure enables the true potential of digital business. The company has offices in the UK and Finland.

RapidLEI is the brand/trading name of Ubisecure Oy (also trading as Ubisecure Inc) – an accredited LEI Issuer. As the name suggests, we've worked hard on the application process workflows to rapidly supply LEI's. Our algorithms do much of the heavy lifting - providing unparalleled automation, improving accuracy and reducing the total cost of ownership for the Legal Entity during the application process.

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