CBAR - Reporting Portal and API

CBAR Project Team

Financial Intelligence Analysis Unit

Guidance and Training
Implementation of the Central Bank Account Registry

20 July 2020
Agenda

- Introduction to the Webinar
- Overview of the Project
- Demonstration of Registration Procedures
- Data Upload Procedures
- API Details
- Q&A
Introduction to the Webinar

→ Opening Remarks
→ Webinar Guidelines
Webinar Guidelines

→ The session will be recorded for our Training and Outreach Initiatives.

→ To avoid any disruptions we will be disabling the audio for all non-presenters.

→ Questions can be submitted via webex chat after the presentation of the session and answered in the Q&A session. Please submit only relevant questions and address them to everyone to avoid duplicate questions.

→ Any questions that we won’t be able to answer we will answer after the session.
Overview of the Project

→ Meeting EU Legal Requirements
→ Local CBAR
MEETING EU LEGAL REQUIREMENTS

→ Directive (EU) 2018/843
  • Fifth Anti-Money Laundering Directive introduced the new Article 32a
  • To transpose and go live by 10 September 2020

→ Directive (EU) 2019/1153
  • Chapter II of the Directive on the Use of Financial and Other Information
  • To transpose by 1 August 2021

CBAR Project has consolidated transposition in a single exercise – deadline for completion and go live is 10 September 2020
LOCAL CBAR FRAMEWORK

Primary Legislation.
Subsidiary Legislation.
Implementing Procedures.
Technical Requirements.
Virtual IBANs

What are Virtual IBANs.
Who should report them.
Virtual IBANs
Demonstration of Registration Procedure

- Registration
- Approval
Registration Process

Developer to demonstrate the process
User Registration to the CBAR System

1. Open Registration Website
2. Register New Person to a New Organisation
3. Verification Email
4. Submit Application
5. Application is Reviewed by CBAR Team
6. Notification is sent on update of Request Status
Data Submission and Monitoring

Process Flow

1. **Prepare and Submit File**
2. **File Submission Notification**
3. **File Validation**
   - **File with Level 1 Errors**
   - **File with Level 2 & 3 Errors**
4. **Next Exp. Submission Date**
5. **File is Valid**
6. **Validation Result Notification**
7. **PASS/FAIL**
8. **Detailed Validation Report**

**Reporting Entity**

**CBAR**

**CNUM_CBAR_YYYYMMDD_YYYYMMDDhhmmss.XML + ZIP**
User and Entity Management

- Change Entity Details
- Change User Details
- Deregister User
- Email Subscriptions
Data Upload Procedure

→ MoveIT file transfer
→ Other details
Demonstration of

Authentication

MoveIT File Transfer
• Either human (triggered manually by a person)
• Or machine (handled by a program which calls API)
• Restricted by source IP address (that is, by the reporting entity’s public IP address)
• Authentication is through username, password and push notification
• Browse to https://moveit.fiaumalta.org
• Log in using the credentials provided by the FIAU (username and password)
• Accept the push notification that is sent to the Microsoft Authenticator app on the user’s mobile device
• Once logged in, the user lands directly on a page which allows them to drag-and-drop the file they would like to upload
• The system checks whether the filename is in the form *.zip
API Details

→ Integration Points
→ Functionality
• Authentication is through username, password and client certificate
• Username and password are provided by FIAU
• Public portion of client certificate (and corresponding root certificate) is provided by reporting entity to FIAU
  • Note: certificates need to be in base64 format
• Login:
  • r = session.post('https://moveitAPI.fiaumalta.org/',
    data={'transaction':'signon','Username':username,'Password':password},
    cert=(path/to/user_cert.cer, path/to/cert_key.key))
• Get API token:
  
  
  ```python
  r = session.post('https://moveitAPI.fiaumalta.org/api/v1/token',
  data={'grant_type':'session','language':'en'})
  headers = {'Authorization': 'Bearer ' + r.json()['access_token']}
  ```

• Get user folder ID:

  ```python
  r = session.get('https://moveitAPI.fiaumalta.org/api/v1/folders',
  headers=headers,
  data={'name':username}) # filter for API user's folder
  
  folder_id = r.json()['items'][0]['id']
  ```

• Upload file to the folder:

  ```python
  r = session.post('https://moveitAPI.fiaumalta.org/api/v1/folders/folder_id/files',
  headers=headers,
  files={'filename': open('filename.zip', 'rb')})
  ```
• Full API documentation is available freely and publicly at:
  https://docs.ipswitch.com/MOVEit/Transfer2020/API/rest/
• Furthermore, a more details example script is also available:
  https://community.progress.com/s/article/Large-Files-Not-Uploading-When-Using-REST-API
Timelines

→ Registration
→ Testing
→ Data Upload
→ API Integration
## Deliverables

<table>
<thead>
<tr>
<th>Deliverables</th>
<th>Timeline</th>
<th>Notes</th>
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<tbody>
<tr>
<td>Registration Process</td>
<td>10 – 21 August 2020</td>
<td>Optional initially but required by the 10th September 2020</td>
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<tr>
<td>Pilot Testing for all reporting entities</td>
<td>10 – 21 August 2020</td>
<td>Optional but highly recommended</td>
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<tr>
<td>Clean-up of Pilot Testing Data</td>
<td>24 – 25 August 2020</td>
<td>Registration data to be retained only</td>
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<tr>
<td>Soft Launch of Data Submission</td>
<td>26 August – 9 September 2020</td>
<td>Optional - Early go-live with LIVE data</td>
</tr>
<tr>
<td>First Data Upload</td>
<td>10 – 16 September 2020</td>
<td>Required from this point onwards</td>
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<tr>
<td>API Integration</td>
<td>Early October 2020</td>
<td>Optional</td>
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1st Phase
Manual XML Upload (Required)

2nd Phase
API Integration (optional)
Q&A Session
Thank you!

CBARTechnical@fiumalta.org