

The background of the cover features a close-up photograph of a spiral-bound notebook with a gold-colored metal spiral on the left side. The notebook pages are white with light blue horizontal lines and a dotted midline. A blue and silver ballpoint pen lies diagonally across the pages on the right side. A large, solid blue rectangular block covers the bottom half of the page, with a red vertical bar on its left edge.

RA Questions and Answers

Project: Beneficial Ownership Secure Search System (BOSSs)

Client: The Government of the Bahamas

Version: 1.2

TABLE OF CONTENTS

1	REGULATORY QUESTIONS	3
1.1	Deadline / Timeline.....	3
1.2	Data Requirements.....	4
1.3	Data Deletion.....	8
1.4	Beneficial Ownership Clarifications	9
1.4.1	Guidance for Trust Companies	12
1.4.2	Guidance for ownership of companies by a Foundation	13
1.5	Access to BOSSs	13
1.6	Operational.....	14
1.7	Legislation.....	17
2	OTHER QUESTIONS	18
2.1	General.....	18
2.2	Security	21
2.3	Data Load.....	24
2.4	Manual Entry.....	28
2.5	Audit Trail	29
2.6	API.....	29
2.7	Infrastructure, Technical.....	30
2.8	Application Support & Fees	32
2.9	Repeated Support Questions and Answers	33

1 REGULATORY QUESTIONS

1.1 Deadline / Timeline

#	Question	Answer
1.1.1	What is the deadline to provide data in BOSSs?	<p>There are 2 deadlines:</p> <ul style="list-style-type: none"> - 15-Sep-2019 for the top priority 100 RAs; - 31-Dec-2019 for all other RAs. <p>The priority is determined strictly based on the number of legal entities that are under RA's management.</p> <p>By the deadline, all RA's data needs to be provided in RA's BOSSs Portal and confirmed. Confirmation step would require for the validation rules in the provided Data Load Template to be met (i.e. all data should be valid and complete).</p>
1.1.2	Will an extension to timeline be provided?	No, there is no plan for providing an extension by the Government of the Bahamas for the above timeline.
1.1.3	Will the Competent Authority search RA's data prior to 15-Sep-2019?	<p>No. The CA Portal will go live on the 15-Sep-2019. Prior to this date, RA data will not be searchable by the CA, even if the RA Portal is in "Production" mode.</p> <p>"Production" mode in the RA portal indicates that RA has real data (i.e. real data entry is in progress, or has been completed), and the portal should not be used for testing purpose.</p> <p>Those Registered Agents who will be onboarding after 15-Sep-2019, will not be available for CA search until their RA Portal is live/in production mode.</p>
1.1.4	<p>Please confirm the timeframe for sharing the following:</p> <p>Data/field requirements for upload;</p> <p>Technical requirements;</p> <p>BDO Briefing presentation</p>	<ul style="list-style-type: none"> - Data/field requirements – available; - Technical/API requirements – available; - RA Portals deployment – already set up or in progress for all RAs who have provided the completed System Admin form to BDO. <p>Please contact Mariam Salib (msalib@bdo.ca) to get a copy of the materials. You should have all materials provided after an initial Kick-Off meeting with BDO.</p>
1.1.5	It was noted that the initial focus for data templates will be on requirements of BO Act and not CESRA. Considering the exercise being carried out by the SCB currently, the	Assuming CESRA is Economic Substance. Please note that the BO exercise is completely separate from the Economic Substance exercise and speak to the requirements of the Register of Beneficial Ownership Act – responsibility for implementation – Office of the Attorney-General. Ministry of Finance has responsibility for the Economic Substance requirements.

	<p>timeframe for compliance with CESRA and the BO it would be great if both requirements can be done the same time. This would help tremendously with RAs not having to carry out multiple data calls to clients.</p>	<p>In order to be able to meet the deadlines, we will have to focus on getting Beneficial Ownership data first into the system.</p>
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IMPORTANT: All test data will be deleted while promoting a RA Portal into the “Production” mode. All RAs need to ensure they do not spend redundant efforts on entering/uploading final data and confirming it while their portal is in the “UAT” (User Acceptance Testing) mode. In “UAT” mode all manual entry and file upload, and API are supposed to be used for testing and training purposes only, with fictitious data. Upon RA’s request once training and testing was completed, BDO will promote the portal into Production mode and erase all test data by re-creating the RA Database.

1.2 Data Requirements

#	Question	Answer
1.2.1	<p>What are the mandatory/ required fields?</p>	<p>Please refer to the latest version of the provided “Data Model Description” document and “Data Load Template” for details. Latest version is available upon request, please contact Mariam Salib (msalib@bdo.ca) to get a copy. You should have all materials provided after a Kick-Off meeting.</p>
1.2.2	<p>Is an RA expected to provide a history of changes?</p>	<p>No, historical changes do not need to be provided for Entities/Beneficial Owners. RAs will need to provide <i>current values</i>, after which BOSSs RA Portal will take care of automatically tracking changes that were confirmed going forward.</p>
1.2.3	<p>Is an RA expected to provide historical entities that were struck-off or ceased to exist already?</p>	<p><i>Please refer to section 10(2) “Retention Period” of the BO Act.</i></p> <p>Legal entities that were struck-off or ceased to exist prior to 1-Jan-2019 (commencement of the BO Act), do <i>not</i> need to be provided.</p>
1.2.4	<p>Is ID Document required for a BO?</p>	<p><i>Please refer to the BO Act, section 9(2)(b) “Duty to maintain database”.</i></p>

		A Government issued ID, e.g. passport, driver's licence, or other government-issued ID is required to be provided for each BO Natural Person (UBO, i.e. ultimate beneficial owner).
1.2.5	Will an expired ID document be accepted by the system?	<p>Yes, expired IDs will be accepted. However, it is responsibility of each RA to replace expired IDs with valid active IDs as soon as they become available.</p> <p>RA Portal's Advanced Search can be used to find all BOs where ID Expiration Date is prior to <Current Date>.</p>
1.2.6	Is Expiration Date mandatory for ID Documents? Some of our IDs do not have an expiration date.	Expiration date is mandatory for all Passports and Driver's Licenses. For "Other" type of government-issued IDs the Expiration Date is optional.
1.2.7	Do we need to provide scans/evidence of address or ID documents?	No, only data values need to be provided, documents/files do not need to.
1.2.8	What is a turnaround time or frequency to update data in BOSSs by RAs?	<p><i>Please refer to the BO Act, section 11 "Duty to keep beneficial ownership information up to date".</i></p> <p>A legal entity shall within <i>fifteen days</i> of becoming aware of a change of any required particulars relating to BOs or RLE notify its RAs of changes in BO information and date it took place.</p> <p>A RA shall <i>immediately</i> on being notified update information pertaining to any of the BO particulars in their RA system.</p>
1.2.9	Some of the BO Companies are PRC (People's Republic of China) companies, which only have Chinese name and address. In this case, can we provide Chinese characters for the BO Company Name and Address?	<p>Values in English from the Bahamas Corporate Registry needs to be provided in Name and Address fields.</p> <p>A names in another language, as well as "trading as" name for an entity can be provided in the Alternative Name field.</p>
1.2.10	Should an exempt person be provided to BOSSs?	<p><i>Please refer to the BO Act, section 7 "Exempt persons" and 9(2)(d).</i></p> <p>A legal entity that is an exempt person still needs to be provided to BOSSs, however it can have no beneficial owners. Section 9 (2) (d) requires that a RA is obligated to provide details of exempt person and the basis upon which the exempt person is</p>

		designated as an exempt person.
1.2.11	If a beneficial owner is a Bahamas Licensee, is it necessary to also complete the section of the form that relates to the RLE?	<p>Please refer to the BO Act, section 6 “Registrable legal entity”.</p> <p>If a Beneficial Owner is a licensee, or is listed on a recognised securities exchange or is otherwise qualified as a Registrable Legal Entity (RLE) based on the BO Act, then the Entity still needs to be provided with a Beneficial Owner being an RLE (i.e. BO Company).</p> <p>“A registered agent has a limited duty in relation to a registrable legal entity. In relation to a registered agent’s duty to identify beneficial owners (please see section “Duty of registered agent to identify beneficial owners” below), a registered agent is not required to identify any beneficial owner of a corporate and legal entity who holds its interest, directly or indirectly, in the corporate and legal entity through a registrable legal entity provided that the registered agent identifies that registrable legal entity for that purpose.”</p> <p>“Corporate and legal entities must identify any person who is a beneficial owner or a registrable legal entity and notify the registered agent within 15 days of identification.”</p>
1.2.12	What is a RLE?	Please refer to the BO Act, section 6 “Registrable legal entity” for the definition of the Registrable Legal Entity (RLE).
1.2.13	Can a Company/Entity be entered into the system without Beneficial Ownership information? (In which cases is BO information optional?)	<p>Every Entity must have a Beneficial Owner, with the following few exceptions where BOs will be optional where an Entity is an exempt person (section 7 of the BO Act):</p> <ol style="list-style-type: none"> a. A company which has securities listed on a recognized securities exchange (the Stock Exchange Name will be required); b. A company which is a Licensee or a wholly owned subsidiary of a licensee; c. Any other legal entity the Minister may exempt by

		regulations.
1.2.14	Is there a prescribed format in which the registered agent database should be in?	<p>The BOSSs RA Database will have standardized format and RA's own instance of the database will be established and provided by BDO for each of the RAs in the cloud.</p> <p>RA will need to provide data into their database by one of the 3 means: manual entry in their BOSSs RA cloud portal, file upload, or direct integration via an API.</p> <p>The list of fields has been provided in the "Data Model Description" document and "Data Load Template" spreadsheet.</p>
1.2.15	Is there a field to capture the % of shares held by BO?	% of shares does not need to be provided. However RA can use "BO Classification Notes" field on BO for any internal notes like this.
1.2.16	<p>Will CA be able to search historical information, such as:</p> <p>a) a Beneficial Owner that was previously present, and then has been deleted;</p> <p>b) a Beneficial Owner had Last Name changed;</p> <p>c) a Beneficial Owner had End Date provided (i.e. BO was applicable before, but not after the end date)?</p>	<p>Yes, it is a CA requirement to be able to search all such historical information (a-c).</p> <p>a) CA will see that a BO record is currently deleted.</p> <p>b) CA will see current Last Name, and historical Last Name in change history;</p> <p>c) CA will see the End Date value for such BO.</p> <p>The rationale behind this is that if a follow-up is required on a previous request, previous returned data should still be available, but with updated information. Additionally, a lot of investigations are backward looking and are looking at periods that may be 5 years prior to the present day search. This will mean that information could have changed since then but the UBO will still be liable for the period he/she was UBO of the entity.</p>
1.2.17	For <i>Domestic Companies</i> that are "not in good standing", i.e. did not pay fees for a long time, and are not getting automatically struck-off, should they be reported to BOSSs with their Beneficial Owners? Such entity may not be in contact with their RA for years (sometimes a decade), and sometimes their only Beneficial Owner could have deceased already but RA would not	Yes, as in the Bahamian law they can be reinstated upon payment of fees and filing outstanding documentation. BO information should be provided for all entities that are on the companies register as of 1 January, 2019. The only exception is where the Registrar General Department (RGD) has advised that the company has been struck – off.

	be aware.	
1.2.18	For <i>Domestic Companies</i> that continued paying fees (or RA continued paying fees on their behalf) and are in good standing but are actually inactive (no activity, no services by RA), should they be reported to BOSSs with their Beneficial Owners? Such entity may not be in contact with RA for years (sometimes a decade), and sometimes their only Beneficial Owner could have deceased already but RA would not be aware.	Yes, these companies' BOs should be reported to BOSSs. If RGD has advised that the company has been struck-off before 1 Jan 2019, the BO does not have to be placed in BOSS.
1.2.19	For <i>International Business Companies</i> that did not pay fees for a long time, they should be automatically struck-off the register of companies. Sometimes notification from the register comes to RA with a significant delay (3-4 months), and sometimes does not arrive at all. Is there a way how RA can find out the current status of their entity, i.e. whether it is active or struck-off? What should they do when it is still active but was supposed to be struck-off due to several years of non-payment of fees? Which date to use as Struck-Off Date if they are struck-off?	The BOs should be reported if no notification from Registrar General that the companies have been struck off. The struck off date is that given by the Registrar General. Alternatively, RA can find this entity in the online register and check its current status and the date of struck-off, if any.
1.2.20	Once information is in the system, and an ID would expire over time, should it be replaced in BOSSs with a valid current ID?	Yes, it should be when available. Advanced search can be used to find such expired IDs.
1.2.21	How do we update an Entity that has resigned with our RA?	Please change its status to "Transferred to Another Registered Agent", the Status Date (i.e. the date of resignation) and enter a comment that the RA has resigned.

1.3 Data Deletion

#	Question	Answer
1.3.1	Can we delete an Entity in BOSSs that was dissolved, liquidated or transferred to another registered	Please refer to section 10(1) "Retention Period" of the BO Act.

	agent after 1-Jan-2019?	<p>Legal entities that were dissolved, ceased to exist (e.g. liquidated or merged) or where RA ceases to be RA for that entity (e.g. entity transferred to another RA or continued out of the jurisdiction) after 1-Jan-2019 (commencement of the BO Act), need to be provided and retained in the system for 5 years. After the retention period is over, such Entity can be (but does not have to be) deleted from BOSSs.</p> <p><i>Example:</i> for an active Entity that is dissolved on 2-Mar-2019 (or 15-Jun-2020), need to change the Entity Status to “Liquidated”, provide corresponding Status Date, and retain such entity in BOSSs for 5 years after the liquidation date.</p>
1.3.2	If a person stops being a UBO (e.g. no longer qualifies as a BO, or deceased), can such BO be deleted in BOSSs?	<p>In this case RA should not delete a BO, but rather should change the BO’s End Date value. Deletion of a BO should only happen in case such BO was added by mistake (e.g. a duplicate/wrong entry) and should have never been added.</p> <p>RA can also enter comments in case a BO has deceased.</p>
1.3.3	Can BO data be permanently deleted from BOSSs? Does it keep historical data?	<p>Deleted records are flagged in the system as deleted but not entirely removed from the database. System maintains history of changes made to each BO record, including the fact that it was deleted. Records that are marked as “deleted” are still searchable by both CA and RA but are struck through to visually indicate their deleted status.</p> <p><i>Note: permanent deletion feature is in the roadmap for 2020.</i></p>
1.3.4	If an Entity has transferred to another Registered Agent, can we remove this Entity?	<p>In such case need to select the “Transferred to Another Registered Agent” status and enter Status Date. New Registered Agent’s name should be provided in the Comments field.</p>

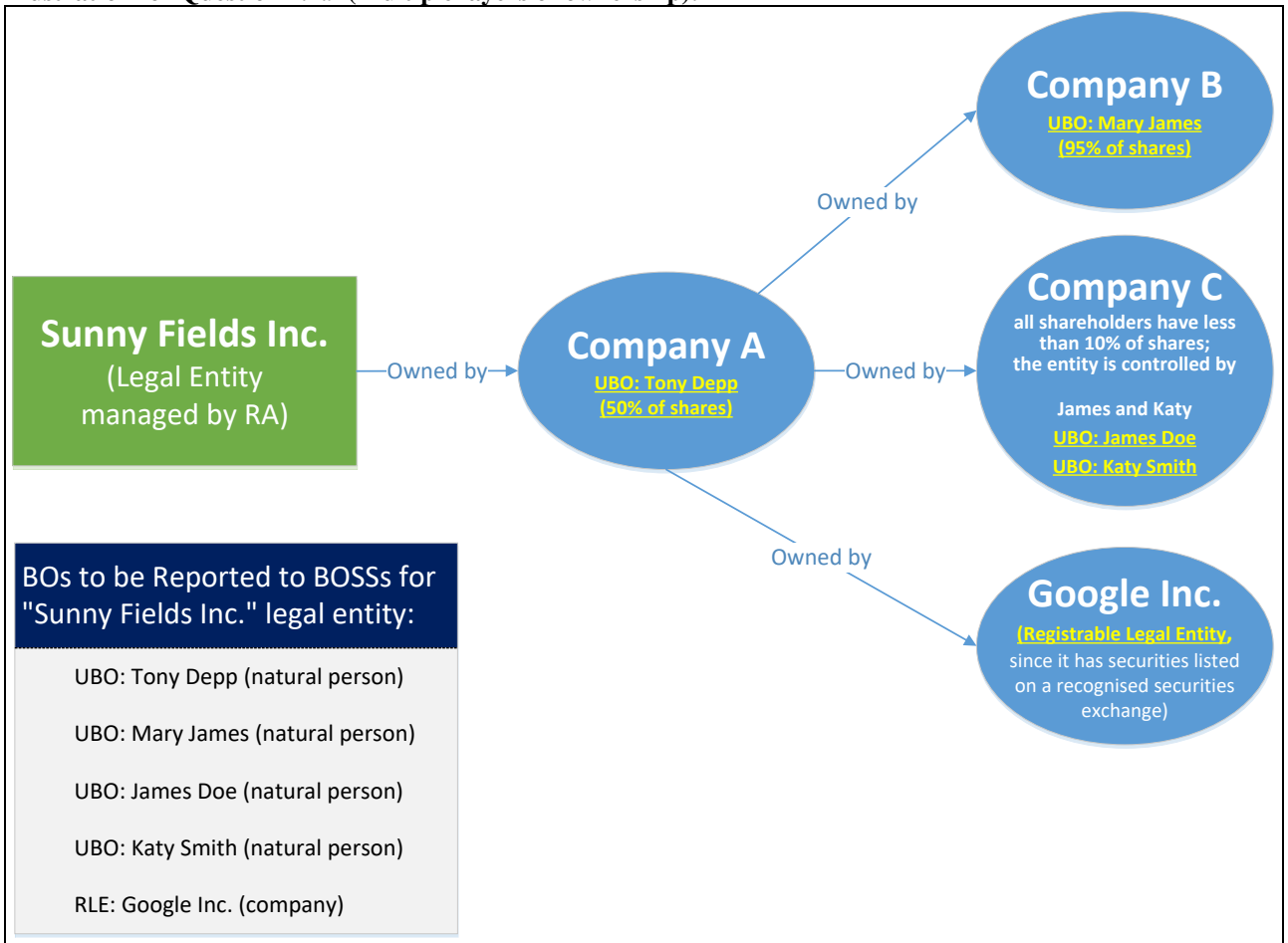
1.4 Beneficial Ownership Clarifications

#	Question	Answer
1.4.1	Is it 10% or 25% shares that is needed for a person to be a UBO?	<p>Please refer to Act, section 5 “Beneficial Owners” for the entire BO definition.</p> <p>It is 10% (or more) of the shares or voting rights of the legal entity.</p>

1.4.2	Who do we provide as a BO in case there is no one with 10% (or more) of shares or voting rights? Is an Entity exempt in such case?	<p><i>Please refer to Act, section 5 “Beneficial Owners” for the entire BO definition.</i></p> <p>There are other parts of the UBO definition in the BO Act (apart from percent of shares and voting rights) that will need to be applied in such case, e.g. “a natural person who otherwise exercises control over the management” of the legal entity, and other provisions in the definition that need to be followed in this case.</p>
1.4.3	Can a BO be a legal person/company?	<p>Yes. A BO can be a legal person (i.e. a company) where the BO falls within the definition of a “Registrable Legal Entity” under the Act, please refer to section 6. Otherwise the corporate structures should be examined. In all other instances the ultimate beneficial owner should be entered in BOSS.</p>
1.4.4	In case a BO has deceased, who will be the new BO?	<p>An executor of their will (if there is a will); or personal representative/administrator (if there is no will) will be the BO.</p> <p>Please refer to section 5(1)(e) of the BO Act.</p>
1.4.5	Home Ownership Associations (HOA) - have many home owners (e.g. 64, sometimes several hundreds) - should all of them be recorded as Beneficial Owners? If not, who will be the BOs?	<p>The persons who control / direct the HOA's operations should be listed with their information.</p>
1.4.6	US LLC (LLP, Partnerships or Corporation) - Bahamian registration is under the Companies act, there may be another layer of corporations above that, how do we capture BOs in this case? Example: have a Bahamian IBC owned by two companies - one in the US, one outside of the US, behind those there are 4 or 5 entities in different jurisdictions.	<p>The major shareholders that are natural persons must be identified. RA must look through the holding companies to identify these persons.</p> <p>If the persons at the top are exempt companies then they must say so - see BO Act.</p> <p>If there are numerous small shareholders at the top - the persons that control or direct the companies directly and indirectly should be listed.</p> <p>RAs must review corporate structures to ensure they are following the FTRA requirements. If they are - the information should already be in their possession. KYC principles at work.</p>
1.4.7	What to do with shelf companies? Do they need to be provided as legal entities to BOSSs and who are the BO's?	<p>Yes, shelf companies need to be provided.</p> <p>Until the Shelf Company is sold it is owned by the Registered Agent. The registered agent is an exempt person as it is a licensee. Therefore the BO of the Shelf Company is a registrable legal entity and the information should be put into BOSSs in accordance with the sections that so</p>

		<p>apply to registrable legal entities.</p> <p>Of course as soon as the Shelf Company is sold, the BO information must be updated in line with the law.</p>
1.4.8	<p>Domestic company is a legal entity that is a condominium, who will be the BOs?</p>	<p>The beneficial owner of the Company which declares the condominium should be listed until a unit is sold. Then the BO of the purchaser of a company or partnership relative to that unit.</p> <p>The common areas would be owned by a company in which every unit owner will have shares. Hence the name of each unit owner.</p>
1.4.9	<p>When an entity is owned by another company, where would we then enter ownership data for that company? Can you send me an example of how the BOs would look for an entity which is owned by a company which is owned by another company which is then owned by individuals?</p>	<p>In case where a legal entity is owned by a company which qualifies as an RLE based on section 6 of the Act, then this company can be provided as a RLE BO to BOSSs. In all other cases all layers of ownership should be analysed to find out ultimate beneficial owners (natural persons) behind these layers and the owning companies do not need to be provided. Instead, natural persons behind all layers of ownership should be provided as BOs. Please see the illustration below for an example. Each BO/RLE should be reported on a separate row within a Data Load File, with same entity details populated (i.e. details of the Legal Entity that the BOs belong to).</p>

Illustration for Question 1.4.9 (Multiple layers of ownership):



1.4.1 Guidance for Trust Companies

#	Question	Answer
1.4.1.1	Who is the beneficial owner when a company or legal entity is owned by a trust?	If the trustee of the Trust holds 100% of the shares in the company, complies with the FTRA 2018 CDD requirements for trusts (holding BO information on vested beneficiaries, protectors, settlors, and any person who exerts control over the trust) and is a registrable legal entity or an exempt person, BO information will not be required, but details of the registrable legal entity or exempt person, as applicable, will be required pursuant to Section 9(2)(c) and 9(2)(d) respectively.

1.4.2 Guidance for ownership of companies by a Foundation

#	Question	Answer
1.4.2.1	Who is the beneficial owner in case of a Bahamian company owned by a foundation?	When the ownership of a company rests with a foundation that is administered or controlled by a RLE (either a licensee or a foreign regulated person) then the RLE should be placed in the BOSS as BO. Provided a RLE is involved, the purposes of the BOSS would be met by requiring the name of the RLE to be entered into the BOSS whether the RLE controls the foundation (as council or officer) or administers it (as an officer in circumstances where there is a third party council).

1.5 Access to BOSSs

#	Question	Answer
1.5.1	Is it required that the person who uploads/enters data in the BOSSs System is a Bahamas resident? As we have to design the process on how we upload data for our managed trust license, this is a vital input.	Anyone with a <i>managed RA license</i> (issued by Bahamian Regulators) with a Bahamas RA can do the data entry process and can enter/upload data, from any country. They do not need to be Bahamian residents. The Bahamas RA will be responsible for all of their data and its quality.
1.5.2	Can data entry be done by introducer persons within or outside of the Bahamas (e.g. Hong Kong or Switzerland)?	No, only RAs licensed and regulated by the Bahamas Regulators should be uploading, entering, and accessing data in BOSSs. It is responsibility of each RA to ensure no other users and third parties will be permitted access to their RA portal.
1.5.3	Should I be physically present in Bahamas to access a RA Portal for BOSSs?	There is no need for a user to be physically present in the Bahamas. Any authorized RA user can access BOSSs RA Portal from other countries, as long as they have internet access. All user's activity will be recorded in the Audit Trail no matter from where they have accessed the system.
1.5.4	Can other RAs or BDO access my RA Portal/data?	No, only the RA the data belongs to can access this data through their RA Portal. Each RA has their own RA database, independent and physically separate from other RAs. RA data is encrypted in the database with an encryption key that is specific to each RA and rotated on a random basis. Users are controlled/managed by RA System

		Administrator.
1.5.5	Will the Regulatory entities have access to BOSSs?	Regulatory entities will not have access to BOSSs. Only a designated CA person appointed by the Minister/AG will be able to conduct searches in BOSSs. Requests for BO information on companies must be directed to the designated CA person and will be getting responses from the designated CA person. <i>Please refer to the BO Act, sections 12 (1) and 12 (2).</i>

1.6 Operational

#	Question	Answer
1.6.1	Are there any workshops, seminars, guidance notes planned providing further guidance with regard to the implementation of the database and the information to be implemented in the system?	Workshops, seminars and guidance to be conducted by BDO.
1.6.2	What is Bahamas Government doing regarding the operational processes to adhere to security standards surrounding the system?	The precautions are taken by granting access to the CA BOSSs portal only to a single designated CA user (with another CA “backup” user). Audit trail and system constraints are in place as additional precautions (such as up to 100 records in search results, search results destroyed and not retained after completion of a search, 3 characters minimum in Entity name search, 2 characters minimum in BO name search, mandatory criteria by name/incorporation number/etc., no export/print/copy capabilities, secure access with 2-factor authentication, full audit log).
1.6.3	Who appointed BDO to work with the RAs?	The Bahamas Government, Office of the Attorney-General that has the contract with BDO.
1.6.4	Who will review audit logs from the CA Portal? Will the Bahamas Government define a 3rd party auditor for the system?	The Bahamas Office of the Attorney-General will appoint an Auditor from OAG who will regularly monitor the CA Audit logs and review that the CA Search Portal is being used in the intended manner. This will include reviewing the request numbers for legitimacy, the nature of the searches match those within a particular request, only designated persons from

		designated locations are accessing the system.
1.6.5	Can our RA be notified regarding CA searches?	As per the BO Act, the fact of conducting a CA search, as well as nature of CA searches is confidential and must not be disclosed with any party.
1.6.6	Can BDO create a report from all RAs on number of companies and BOs uploaded to verify completeness of data?	Yes, if required, BDO can produce such a “completeness check” report for the CA, this will be based on count of entities and BOs provided and confirmed by a RA.
1.6.7	Are there any limitations with respect to CA searches?	<p>CA has access to conduct a legal search of the RA’s data in accordance with the BO Act. Any CA search can only display up to 100 records at a time. In addition, any search request must include at least one of the following criteria:</p> <ul style="list-style-type: none"> - Entity Name; and/or - Incorporation or Formation #; and/or; - BO Name; and/or - BO Identification Document #;and/or - BO Date of Birth; and/or - BO or Entity Address <p>Search value must be at least 3 characters long for Entity Name and minimum 2 characters for BO Name.</p> <p>Audit log will also be created for all CA Searches, and monitored by the OAG Auditor on a regular basis.</p>
1.6.8	When the CA conducts a search within BOSSs system, would that search request be audited (for legitimacy of a request received) before/after the search results (data) are released?	<p>Vetting of a request for legitimacy occurs already before any searches/requests to RAs, and this process will continue as currently.</p> <p>BOSSs CA Audit of searches will be done after the fact due to the timeline when responses must be provided. The OAG will be reviewing the audit logs on a regular basis. There is a registry of requests held in writing, that the audit trail will be compared with, in order to assess legitimacy of all searches.</p>
1.6.9	Who owns the BOSSs system?	The RA portal (entities and BOs) is owned by the RA. The CA Portal is owned by the Bahamas Government. BDO is currently providing an IT

		service to maintain/support both.
1.6.10	Can a RA view what a CA has searched?	No, it is not possible for a RA to monitor CA searches due to confidentiality of all CA searches that is a requirement in the BO Act.
1.6.11	When a competent authority does a search, can they download information?	Competent Authority can only search and view results on screen and cannot download/ extract/ print/ copy information. All positive search results must be written on the designated forms and sent to the appropriate authority to respond to the search request.
1.6.12	How will entities that do not have a registered agent access the system?	As per the BO Act, section 8(1), the Bahamas Registrar General will play the role of an RA for Entities without a Registered Agent.
1.6.13	What (if any) end user or RA cost will there be?	<p>The cost of the system will be shared between the Bahamas Government and RAs. The details of this are still being determined and will be shared with RAs once finalized.</p> <p>Fees structure will have multiple tiers to make sure RA's size is taken into consideration.</p> <p>There will be no additional fees associated with number of users in the portal.</p>
1.6.14	Has the Competent authority decided on how the information on an internal database will be uploaded/transferred to the portal?	<p>RAs will need to provide data into the RA database by one of the 3 means: manual entry, file upload, or direct integration via an API.</p> <p>This way, for an established RA's own system, the advised method would be to export data into the Data Load Template format (XLS, XLSX, CSV, or TSV file type) that has been provided, and import into the BOSSs RA's Portal in the cloud.</p> <p>Alternatively, or at a later stage, RA may choose to implement direct integration of their system with the BOSSs RA Portal through the API that will be provided.</p>
1.6.15	How will you ensure that only valid searches are executed?	<p>A mandatory request # has to be entered by a CA designated person to perform any search. Each search is recorded in CA Audit Trail with its search criteria and Request # tracked. This Audit Trail will be monitored by the AG office on a regular basis to ensure each Request # is valid and lawful request for such search. .</p> <p>In addition, CA searches have built-in restrictions that are designed to prevent data fishing, such as:</p>

		<p>Maximum 100 records can be returned in search results.</p> <p>Minimum 3 characters for Entity name, and minimum 2 characters for BO name search.</p> <p>At least one of the key fields must be part of search criteria, such as: Entity/BO Name, BO Identification Document #, Date of Birth and a few others.</p>
1.6.16	<p>Will there be an audit of the CA conducted searches and if so will it be performed by an independent body to foster transparency and timeliness of audit?</p>	<p>CA Audit Trail will be monitored by the AG Office on a regular basis to ensure validity and lawfulness of searches and requests.</p> <p>The Bahamas Office of the Attorney-General will appoint an Auditor from OAG who will regularly monitor the CA Audit logs and review that the CA Search Portal is being used in the intended manner. This will include reviewing the request numbers for legitimacy, the nature of the searches match those within a particular request, only designated persons from designated locations are accessing the system.</p>

1.7 Legislation

#	Question	Answer
1.7.1	<p>Who should we contact to get legislation clarifications?</p> <p>Who should we contact to get confirmation of BDO's appointment by the Government of the Bahamas?</p>	<p>Please review this document first. If your question was not answered, then please email the following 3 contacts in the Office of the Attorney-General:</p> <ul style="list-style-type: none"> - Tiffany Moss TIFFANYMOSS@BAHAMAS.GOV.BS - Dr. Cassandra Nottage CASSANDRANOTTAGE@BAHAMAS.GOV.BS - Michelle Dean MICHELLEDEAN@BAHAMAS.GOV.BS
1.7.2	<p>What about Bahamian partnerships/foundations, are they in scope and who is considered to be the BO?</p>	<p>The 2019 amendments to the BO Act, now includes all forms of Partnerships. However, Foundations are not included at this time.</p>
1.7.3	<p>According to Art. 12 BO Act, designated persons can use the secure search system. Who is expected to be elected as a designated person by the Minister?</p>	<p>Designated CA person(s) will be from the Attorney-General's Office.</p> <p>Designated RA persons (i.e. RA Portal users) are appointed by a registered agent.</p>
1.7.4	<p>According to the law (Register of Beneficial</p>	<p>The BOSSs RA Database will have standardized format and</p>

	Ownership Act 2018, art. 9; “BO Act”), each Registered Agent needs to establish and maintain a database that is accessible by the secure search system. What are the technical requirements for this database? Can we expect further technical guidance to be published soon?	<p>RA’s own instance of the database will be established and provided by BDO for each of the RAs in the cloud.</p> <p>Each RA will be provided with a unique URL of their BOSSs RA Portal and with credentials of their (i.e. designated by RA) administrator user(s). RA Administrator User will be able to add and manage their other RA Users as needed.</p> <p>The RA Database will be fully encrypted at rest, with automatic backups established in the cloud for any point-in-time recovery for up to 35 days.</p>
1.7.5	Foreign LLCs, which are registered in the Bahamas, would fall under the Domestic Companies Act?	If registered, the RA should follow CDD (Customer Due Diligence) requirements and the BO information should be in their files and should be placed into BOSSs. Yes, the Foreign LLCs are registered under a section in the Domestic Companies Act.
1.7.6	What is the date of commencement of the BO Act?	The BO Act commenced on 31st December, 2018. Full implementation of the BO Act is one year from this date, as such RAs are mandated to comply by 31st December, 2019. (section 18- Transitional)

2 OTHER QUESTIONS

2.1 General

#	Question	Answer
2.1.1	What browsers can be used for BOSSs?	Chrome v46+
2.1.2	Where the BOSSs RA data will reside?	It will be in a secure Cloud repository, always encrypted, at rest and in transit.
2.1.3	Can one RA search another RA’s data?	No, RA can search only their own Entities as well as BOs. Same way, other RAs cannot search or view your data.
2.1.4	How can we view all Companies that we have already entered in BOSSs?	<p>All RA’s confirmed Entities can be accessed via the RA BOSSs Portal, Advanced Search e.g. “Entity: Is Deleted = No” query, or via a quick Entity Search with blank name.</p> <p><i>Note:</i> only confirmed data will appear in search results. Unconfirmed uploaded/ integrated data will be visible in Imported Data Triage screen only, and will not appear in search results.</p>
2.1.5	How can we reconcile data in our other system(s) with data in	There are no reports and extracts of sensitive data, for security reasons.

	BOSSs?	<p>There is an export of Entity Unique IDs and BO Unique IDs that can be used for reconciliation purpose.</p> <p>If all latest data can be extracted from the other system and uploaded to BOSSs, the system will report on each record whether it has No Change, or has changed, and whether it has any validation issues.</p> <p>There are also search capabilities in BOSSs which allow to search by almost all fields of a BO/Entity (Advanced Search) that will allow viewing found entities and their BOs on the screen and viewing their details.</p>
2.1.6	Can we use import/API request/manual entry screens to upload attachments/documents?	<p>No, attachments and documents are not supported by BOSSs.</p> <p>RAs do not need to provide any PDFs/ documents/ attachments/scans, only electronic data/values need to be entered in BOSSs.</p>
2.1.7	Does the BOSSs system allow us to open Identity Documents from our existing Data Management System?	<p>No, there is no way in BOSSs to access information/ documents/ attachments in other DMS systems.</p>
2.1.8	Does BOSSs provide any kind of notifications/ reminders/ warning when an ID Document has expired?	<p>No, it does not at this stage. It is expected that each RAs will monitor this by using Advanced Search.</p> <p>Consideration is being given to including such reminders in the future.</p>
2.1.9	What are the reporting/extract options available in BOSS system?	<p>There are no reports and extracts of sensitive data, for security reasons.</p> <p>Unique IDs of Entities and BOs can be exported for reconciliation purpose.</p> <p>Advanced search can be used for a number of cases (e.g. filtering entities by Liquidated or Struck Off status).</p> <p>RA can also print a search results page through a browser.</p>
2.1.10	Can we have more than one user working in BOSSs system at a time?	<p>Yes, it is possible. All users who access BOSSs will be recorded in the Audit log.</p>
2.1.11	Do we have any data limits or storage options in Cloud?	<p>Currently, each RA has a maximum of 250GB storage in their RA repository. All storages options are managed by the BDO Support program.</p>

2.1.12	Are liquidated companies automatically removed from BOSSs?	No. A liquidated company will stay in BOSSs with Liquidated status and will not be automatically deleted. Please refer to the “Data Deletion” section for details on when a RA can delete an entity/BO.
2.1.13	External Unique Id is something generated by BOSSs? For all subsequent update requests, do we need to keep track of this?	Unique ID needs to be assigned, provided, tracked and managed by the RA, for BOSSs to be able to collect change history. Unique Ids are not generated by BOSSs; they must be provided by the RA.
2.1.14	Are there any rules for Unique ID?	Unique ID must be a unique value within database of the RA, and contain maximum of 50 alpha-numeric characters. BO Unique ID needs to be unique only in the context of their Legal Entity.
2.1.15	If a user’s search request in BOSS returns more than 100 records, will it display all results on one page?	No, the results will be paginated for RAs searches.
2.1.16	Does BOSSs system support multiple addresses for a single BO?	No, BOSSs system supports only one principal address per BO.
2.1.17	Can we view data without using search functionality?	Currently search is the only mechanism to view an Entity or BO.
2.1.18	Is the search case sensitive?	Searches are not case sensitive. Entity name search is a “contains” match. BO Name search is an “equals to” match by Last Name and/or First Name.
2.1.19	Can RA add more than one nationality in BOSS application?	Nationality is a text box field, therefore RA can enter more than one nationality in the same field. E.g. “Canadian, French”
2.1.20	Would we receive a written or electronic confirmation for each successful registration?	<p>The following confirmations are provided:</p> <p>For File Upload Method, there are statistics on how many Beneficial Owners were uploaded into triage area of the RA Database, how many of them have errors, how many were confirmed by RA and applied as permanent records. At any time RA can go back to statistics of imports in the portal and view status and values of each imported record.</p> <p>For Manual Entry method, there is confirmation that record has been saved in the portal, displayed to the user.</p> <p>For Direct Integration via API method, there is an electronic response provided for each request, which states if the request was successful or not. For any way of confirming a record by any of the above means, there is an Audit Trail record that is registered in RA’s Audit Trail and available for search, review and export to a file. i.e. RA can export to an Excel file confirmations made to uploaded/ entered/ integrated records from the Audit Trail. Confirmation</p>

		<p>is the step required prior to making a record permanent in the RA's database and searchable by the CA.</p> <p>Unique IDs of Entities and BOs can be exported for reconciliation purposes.</p>
2.1.21	Who will be the administrators of the search system? What third party access will there be?	<p>BDO will provide system maintenance and support services for all RA Portals.</p> <p>However, BDO will not have access to RA's portal or their data. Therefore, should BDO need to assist an RA with their question or issue in production, a WebEx (or alternative) session will be used to share RA user's screen and provide assistance.</p>
2.1.22	Where exactly will the information be stored?	<p>The information will be stored in always encrypted state in cloud in one of the G7 countries that is not the US or the UK. The country has EU adequacy decision (i.e. has adequate data protection) for GDPR.</p>

2.2 Security

#	Question	Answer
2.2.1	How many users can we have in BOSSs?	<p>An RA can designate as many users as required. For security reasons, recommendation is to keep limited number of users for the BOSS system. BDO will set up to 2 System Administrator accounts to each RA, this System Administrator can log in and add all other RA users (including other System Administrator(s), if needed).</p>
2.2.2	What User Roles are available in BOSSs?	<p><i>Data Entry Person</i> (can enter data, but cannot manage users), <i>System Administrator</i> (has access to all BOSSs portal functionality, including user management and Audit Trail), <i>Auditor</i> (can view audit trail and perform RA data searches, but cannot modify any data or manage users).</p>
2.2.3	Is it possible to restrict users to view only certain Entity/BO data, or part of data?	<p>Data in BOSSs is not departmentalized. A user would be able to access all RA's Entity and BO data and search/view all data. There is Audit Trail, which records all events whenever data was searched, viewed, or modified. Audit Trail includes information on what was done, by whom and when. Audit Trail can be searched and reviewed by an Auditor/System Administrator RA's user.</p>
2.3.4	How security works in BOSSs, can anyone de-crypt stolen data?	<p>Security layers have been implemented within BOSSs and infrastructure is designed to protect the data stored. This includes the following: 256-bit encryption algorithm used to encrypt the transport</p>

		layer and data in the database; a unique private encryption key for each RA which is stored in a key vault and only accessible by RA portal application and used in encryption between the communications between CA Portal and RA Portal; additional security mechanisms implemented within the infrastructure (cloud) environment. In addition, stolen data cannot be decrypted.
2.2.5	Can RA divide the data into different attorneys/ introducers in BOSSs?	Data in BOSSs is not departmentalized. A user would be able to access all RA's Entity and BO data and search/view all data. Please refer to the "Access to BOSSs" section for details on who is permitted to get access to BOSSs from the regulatory point of view.
2.2.6	Can one user perform multiple roles?	Yes, System Administrator has access to all functionality, and can perform all the roles.
2.2.7	Will many invalid password attempts lock a user out?	A user account will be locked out if a user enters their password incorrectly 5 times (consequently). RA's System Administrator needs to be contacted to unlock a user. All incorrect login attempts are logged in the Audit logs.
2.2.8	For how long is a user's password valid?	Existing passwords will automatically expire after 90 days, and a user will be required to change their password on next login. The user will be prompted to update his/her password upon expirations of the password.
2.2.9	Can you screenshot information? If yes, what security/data protection migrations are there?	<p>CA users cannot download, print or copy information from the BOSSs CA Portal. They can only view search results in the portal, and provide responses to corresponding requests by manually typing a response.</p> <p>There is a complete CA Audit Trail that automatically will track all actions a CA user will perform in the CA Portal, including but not limited to login, logout, password change, searches performed, viewing BO details, and others.</p> <p>In addition, CA searches have built-in restrictions that are designed to prevent data phishing, such as:</p> <ul style="list-style-type: none"> - Maximum 100 records can be returned in search results. - Minimum 3 characters for Entity name, and minimum 2 characters for BO name search.

		<ul style="list-style-type: none"> - At least one of the key fields must be part of search criteria, such as: Entity/BO Name, BO Identification Document #, Date of Birth and a few others. <p>The PC which a designated CA person will be using for searches will be located in a secure locked room within the AG office and will be subject to 24/7 video surveillance to ensure continuous monitoring.</p> <p>-----</p> <p>RA users cannot download information for security reasons. There is a complete Audit Trail for each RA representing all actions done by all RA users to RA's data. Each RA's database has its own database and its own audit trail, therefore RAs cannot view data and audit trail of each other.</p>
2.2.10	What is the access approval process?	<p>For RA users, RA will first designate a System Administrator in writing for their RA portal. This RA System Administrator will then be able to grant access to additional RA users if required. RA System Administrator can change user role, and remove a user at any time.</p>
2.2.11	How is data security addressed?	<p>Every RA database is physically isolated from other RAs and is encrypted with a different key, accessed by different credentials. Only the RA's dedicated BOSSs application instance has the access to the RA's database. Not a single person has access to unencrypted data at all.</p> <ul style="list-style-type: none"> - Data at rest and in use is Always Encrypted with master encryption key stored in a Key Vault (FIPS 140-2 Level 2 validated HSMs). Keys rotation is done on a regular basis. - Data in transit is encrypted. - Data transferred within the cloud infrastructure does not go over the Internet. - High physical security (datacenters comply with industry standards (e.g. ISO 27001) for physical security and availability). - High cybersecurity (DDoS protection, antimalware and antivirus protection, regular penetration testing). - High solution security (no

		<p>unauthorized access because no physical access to the solution components to bypass the authorization rules imposed by the application).</p> <ul style="list-style-type: none"> - Built in threat and attack detection mechanisms. - Technology and the solution is compliant with the “data protection by design and by default” principle. - Multi-factor authentication for access by designated authorized RA users only. <p>There are no download features of UBO data out of BOSSs. Once data has been uploaded into BOSSs, it remains within BOSSs. All abilities to download encrypted data, copy data from various screen, etc. have been disabled to ensure there are no back-door abilities to extract UBO data from BOSSs.</p>
2.2.12	How will the RA control access to the system from their end?	Each RA will designate a System Administrator who can manage (add, deactivate, update) RA users and review only proper individuals have access.

2.3 Data Load

#	Question	Answer
2.3.1	Can we use both manual entry and file upload?	Yes. Both methods can be used simultaneously.
2.3.2	Can we add fields in data load template? Can we make changes to data load column titles?	No, users cannot make any changes to the Data Load Template columns and their titles. These have been locked for editing by BDO.
2.3.3	What kind of validation is performed on a sample data file?	BOSSs does not distinguish between dummy/sample files and real data files. Same validations are performed for all files, as per the Data Load Template provided.
2.3.4	If there are multiple companies/entities that have same BO Person, and that BO Person needs to be changed, should one or multiple records be included in an import file? (If a Beneficial Owner record is linked with multiple entities and we update the record in one entity, will it update the record	<p>A BO should be updated in each Entity, i.e. a Person’s update must be provided for each Entity where this person is a BO.</p> <p><i>Example:</i> Maria Doe (ID 123) is a BO in Entities “Company 1” (ID E111) and “Company 2” (ID E222). To import this person’s name change from Maria Doe to Maria Smith, need to provide two import records: Entity Company 1 (ID E111) – Maria Smith (ID 123)</p>

	associated with all other entities?)	Entity Company 2 (ID E222) – Maria Smith (ID 123)
2.3.5	What version of Excel can BOSSs accept?	BOSSs can accept .xlsx files (any version of Excel, as long as it is .XLSX format and extension of the file).
2.3.6	Does BOSSs log any errors during data upload?	<p>Validations are performed during data load and all validation issues can be reviewed during triage of imported data. Validation messages can be exported to a file.</p> <p><i>Note:</i> Import validation messages are not part of Audit Trail, there is a separate staging table that holds all the imported records and validation messages.</p>
2.3.7	Will CA be able to view/ search information that has just been imported?	Not until a RA user will confirm all imported Entity/BO records. Imported data will become final/searchable only after RA’s confirmation. This applies to initial import, and importing data changes.
2.3.8	Can we auto confirm after uploading a file?	A User can press the “Confirm All” button to bulk confirm all imported records that were validated successfully. Records with validation errors need to be confirmed one-by-one, after resolving all errors.
2.3.9	If I make changes in BOSSs for the uploaded data, will this be reflected in my Excel file that I loaded?	No, therefore if you would like to keep BOSSs data consistent with your Excel file or another system, need to make changes in the file/another system and upload. It is required that any change made directly to data within BOSSs is also made to the data being kept by the RA in their own system.
2.3.10	How are import files verified for viruses or other threats?	The system is safe from viruses since BOSSs is not saving files anywhere in the system, only extracting data and saving to the database.
2.3.11	Does Data Load support importing changes or full set of data each time when updates are provided to BOSSs? How does the triage process work for first and subsequent load?	Either approach will work. I.e. can load an initial “complete” file, and then import only changes (additions, deletions, updates) to the previously loaded data, or can load “complete” file each time. System will use Unique Entity Id and Unique BO Id to find such record, and will compare current confirmed BOSSs data with the imported record. In case there was a difference, it will consider this as a “change” record and make it available for RA’s triage and confirmation. For records that have not changed, the import will have them with “No Change” status, and they do not need to be triaged.

		During triage a user needs to either confirm a record (after addressing errors, if any) or remove a record from import.
2.3.12	Will a new file uploaded replace all previous data in BOSSs?	Data will not be replaced. Import will check for each record's Unique Id if such record exists and if any changes are being imported for it. Records omitted from the file will not be deleted. For deletions, need to include them into the file with Delete Entity or Delete BO column set to "Y".
2.3.13	If I upload "complete" file every time, and in the future delete a record in the excel spreadsheet, is BOSSs detecting it at the upload and adding the BO as "deleted" in history? Or is it going to log an error message?	BOSSs import will not delete such record, and will not log an error. Any Entity/BO deletion must be explicitly included as a record in the import file with Delete Entity or Delete BO column set to "Y". Only then the import will delete such record (deletion will require confirmation by a user during triage).
2.3.14	Is Unique Id required?	Yes, Unique ID is required for each Entity and BO. These Ids are to be assigned by the RA and provided in each record.
2.3.15	Should Unique Id be unique across all RAs?	No, it should only be unique within the RA's own data. RA only has their own data in their BOSSs RA database, data of other RAs is stored in different databases.
2.3.16	How many records can be put in a file for upload?	It is possible to enter up to 20,000 of records in a file (or up to 10 MB in file size).
2.3.17	Timing of file upload	Between 15 to 25 minutes for 20,000 BOs in a file is the current timing.
2.3.18	Are country codes available?	Yes, supported country codes are available in the Data Model Description document that was provided by BDO. These are ISO standard's 3-character country codes. Please see Data Model Document or Data Load Template for details.
2.3.19	What is the purpose of data triage?	Triage is the process of validation and review of uploaded data. During triage, records need to be either removed or confirmed. For confirmation, all errors need to be addressed.
2.3.20	Please explain what # Entities to Triage represents on the Upload File screenshot?	When an initial/first file is uploaded, this will be the number of entities from the file, that all need to be triaged. When a subsequent file is uploaded, system will compare uploaded records with the ones confirmed in the system, and require triage only for those records that have changes or need to be deleted. For

		example, it could be 100 entities first time, and 5 changed in the 2 nd upload that will require triage.
2.3.21	What is a validation warning?	System will advise for recommended fields to be entered via a Warning, it is a user's choice whether to address or ignore a Warning. Errors cannot be ignored. Recommended values can help CA user to report better results.
2.3.22	If only one record is not passing validation, can we upload the rest of the batch? (If there are validation issues in one row, will the system highlight the particular record or reject full file?)	Yes, a user can upload and confirm the valid records into the system which do not have errors and deal with those with errors after. The system will highlight individual issues within a record and these can be corrected as part of triage in the portal, or in the original file that can be re-uploaded after removing the current file.
2.3.23	Does the file upload require user authentication?	There is no specific authentication required for file upload, however, 2-factor authentication applied for all user's activities, i.e. 2-factor authentication is required at each user's login.
2.3.24	How does BOSSs manage duplication of records during file upload?	During a file upload the BOSS system will check if the record already exists in the database and if there are any changes in the record, than the system will update the record. Otherwise, the system will add that record as new data entry. There is a check that Incorporation # must be unique across all entities of a RA.
2.3.25	If there are several ID documents, for example a UBO has two passports, do we need to add both?	In case a RA decides to add this information they can upload up to two BO Identification documents from upload file, and can enter up to four identification documents from the RA's portal. <ul style="list-style-type: none"> ○ At least one identification document is required ○ Type, Number, Country of Issue are required. Expiry Date is required for documents like Passport/Driver's License but not for other document where there is no expiry date e.g. SIN.
2.3.26	Is there auto lookup capability in Excel file to fill in same BO multiple times?	No. A user can copy cells with BO details and paste to another row.
2.3.27	If one employee is uploading a file, can another file be uploaded at the same time?	The triage for the first file has to be finished before the next file can be uploaded, it is treated as a first in, first out process.

2.4 Manual Entry

#	Question	Answer
2.4.1	Will BDO provide a training for manual data entry?	Yes. BDO will provide a training for file upload as well as manual data entry in BOSSs.
2.4.2	Why is search needed in the BOSS portal? Can it be hidden?	Users need search functionality to be able to verify if data was uploaded/confirmed/entered correctly. It is also the access point for data viewing, editing, deletion. Search currently is available for all BOSSs RA portal users. Search cannot be hidden.
2.4.3	Is there a limit on a number of users who can do data entry?	There is no limit to a number of persons who will be able to enter data in the system. It will be responsibility of the RA's System Administrator to create a user account for their RA users, and grant appropriate User Role.
2.4.4	Can a user delete a record that was added/imported by mistake?	There is a RA confirmation process for all new entities/BOs added/imported into BOSSs. A new added/imported Entity/BO can be deleted prior to its first confirmation, and such record will not be available for CA Searches. However, once a record was confirmed, its deletion will be recorded in Change History and visible / searchable by CA. CA will see such record as "deleted" and visible as a strickthrough in BOSSs. It is recommended that comments are entered to explain deletion of an Entity/BO. For a Beneficial Owner, it is recommended to delete BOs added by mistake. BOs that have been a beneficial owner historically until certain date, are to be updated with the BO End Date, rather than deleted. Please refer to the "Data Deletion" section for more details on when deletion is permitted.
2.4.5	How can an error be corrected after confirmation, or a change be made?	A user needs to find an entity/BO via the RA portal's search, and update. In case of an error correction, comments are advised to be entered for CA's reference.
2.4.6	Can we enter Company and BO information separately?	No. it is required to enter both Company and BO information together.
2.4.7	While adding a BO, can application retrieve existing BO data automatically?	BOSSs does not have this functionality to auto populate data for existing BOs. Each BO record is independent from others, and does not have shared person details across entities.

2.5 Audit Trail

#	Question	Answer
2.5.1	Are user's actions tracked in the RA Portal? Can we track the activity of each user?	Yes, there will be Audit Trail available for System Administrator and Auditor users that will be searchable and can be reviewed in the RA Portal. It will track all user's activity such as failed and successful login, logout, viewing Entity/BO, searches, changes to data.

2.6 API

#	Question	Answer
2.6.1	Can API be used for initial integration, to avoid using File Upload?	Yes, it is possible. Every API call is for one entity. The response time varies from 500ms to 2s. For batch process such as initial integration of data from another system, programmatically and continuously calling the API by groups (each entity being a single request) should address the need.
2.6.2	Where can API Request and Response definition/ example be found?	Please refer to the latest version of the "Bahamas BOSSs - API Specification" document that will be provided by BDO.
2.6.3	After integrating data via API, does the system allow for data triage by user similar to data triage functionality after file upload?	There is a setting in the API Request called "auto-confirm". If this setting is enabled, all data submitted via API that passes validation will be automatically confirmed in the system with no need for triage. Data that is sent via API with "auto-confirm" setting disabled, or does not pass validation, will be available for triage in the system. Triage for API integrated data in BOSSs includes: ability to view, confirm (if validations successful) and delete. Ability to make changes in BOSSs is not available for the direct integration mode, since data needs to be changed in the source system and sent via API again.
2.6.4	If the Auto-Confirm is set to true while programmatically uploading the Entity/BO, how can the RA get/see all the validation failed messages?	If there are any validation errors, data will not be confirmed. API will return all validation errors per API call. For example, if one entity and three BOs are sent to BOSSs in API via one call, then all validation errors for them will be returned together.
2.6.5	Apart from JSON, can the response be rendered into XML as well?	In the request header, you can set to accept "application/xml". BOSSs API should return the xml format response.

2.6.6	What is the other process for obtaining a subscription key programmatically? Before making API request, do we need to make another web service call request for getting the key?	Subscription key is granted per user who needs access to API. BOSSs will use the key for tracking of all API activities.
2.6.7	Does API support batch insert / update and delete?	Every API call is for one entity (with all of its BOs). The response time varies from 500ms to 2s. For batch process, programmatically and continuously calling the API by groups (each entity being a single request) should address the need.
2.6.8	What kind of database can be used with direct integration?	APIs use industry standard (REST) which can be implemented and used by most systems, regardless of the type of the database used.

2.7 Infrastructure, Technical

#	Question	Answer
2.7.1	Where is the cloud database located?	It will be located in one of the G7 countries except for the USA, UK and Russia.
2.7.2	From security point of view, multi-factor authentication option is available in BOSSs i.e. Form Based Authentication with Verification Key. How will our existing users be able to access the portal? Does every user need to register before login or integrated with our internal / external ADFS. How users are managed and tracked in the portal?	BOSS has its own user management system. It does not authenticate any users registered in other systems / external ADFS. A user must be added by a RA Administrator, to get access to the BOSSs RA Portal.
2.7.3	Every RA has their own Data Repository in the Cloud. We need to get a clear picture on how our data is secured across RAs.	Every RA database is physically isolated from other RAs databases and is encrypted with a different key, accessed by different credentials. Only the RA's dedicated BOSSs application instance has the access to the RA's database.
2.7.4	Are servers physical or virtual?	Not Applicable - the solution uses Platform as a Service and not Infrastructure as a Service.
2.7.5	Can anyone else other than the system decrypt data?	No, only the BOSSs system can decrypt data.
2.7.6	Database encryption?	Always Encrypted with master encryption key stored in a Key Vault (FIPS 140-2 Level 2 validated HSMs).

2.7.7	Is there encryption from the browser to Web Server?	Yes, HTTPS.
2.7.8	Is there encryption from the Web Server to App Server?	Yes, all messages sent via the service bus are encrypted.
2.7.9	Is there encryption from the App Server to Database?	Yes.
2.7.10	Is 2-factor user authentication supported?	Yes. It is mandatory for all RAs to use the 2-factor authentication, i.e. after entering valid username and password, a user must also enter a valid temporary verification code, that they will receive by E-mail or Phone (via a call), based on their choice. This is used each time a user logs into BOSSs.
2.7.11	Are backups taken for RA's data?	The database backups are taken regularly and provide point-in-time recovery to any moment within past 35 days. Data in backups is encrypted. Backup is securely stored in the cloud
2.7.12	Is VPN required?	No VPN is required to access the system. Internet is required.
2.7.13	If a RA has a new BO management system of their own after they go live, then how continuity of Entity and BO Unique Ids can be maintained? E.g. John Doe BO had Unique Id 123 in old system, and may have different Unique Id in the new system.	Recommendation from BDO: It is important to ensure continuity of the Unique Ids. All Unique Ids from the old RA system should be migrated to the new RA system. These can be migrated as Old Unique Id column, as long as uniqueness across all Old and New Unique Ids for this RA is ensured. When data is then extracted for BOSSs data load, need to make sure an Old Unique Id is extracted where present for historical records, and new Unique Id is extracted for new records that do not have a historical old id.
2.7.14	Can we control and customize the portal based on our needs?	No, BOSSs does not support customization by RAs.
2.7.15	In audit trail is there an IP address?	Yes, audit trail includes IP addresses. However, in case of a public address this may be a single address for all users from same RA office.
2.7.16	What is BOSS application idle time?	A user will be logged out after 15 minutes of inactivity.
2.7.17	How does the technical set up of the de-centralized BO secure search system ("BOSSs") look like so that we can technically align our own database to be compliant with the BOSSs?	BOSSs will have a separate cloud database and web portal set up by BDO for each of the RAs. For technical alignment, the following needs to be considered by RA: <ul style="list-style-type: none"> - RA's own database should have all fields as was communicated in the BOSSs Data Model Document in June with RAs. Required fields need to have valid

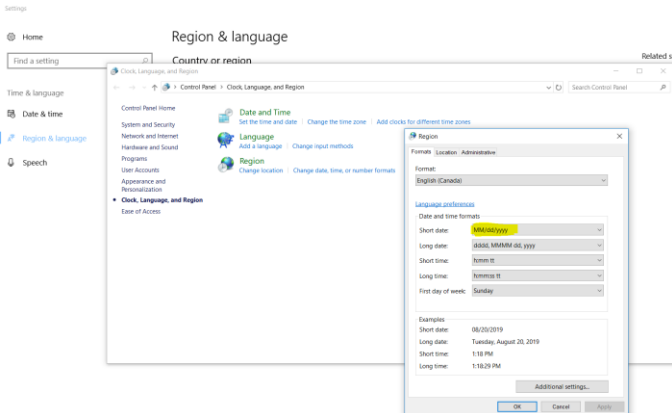
		<p>values.</p> <ul style="list-style-type: none"> - RA will need to choose their primary data entry method: File Upload, Manual Entry, or Direct Integration via API. - In case of File Upload method: <ul style="list-style-type: none"> o RA should be able to export all Beneficial Owners and their Entity details from the RA's own database into a file in prescribed format (XLS, XLSX, CSV, TSV). The BOSS Data Load Template with the prescribed format is being reviewing with the AG Office and will be provided in June. o For RA users, it will be possible to review validation issues, and provide any missing or incorrect data during the data confirmation (triage) step in BOSSs RA Portal. However, it is advised to correct any issues in the source system for consistency of data, and re-export and re-upload the file into BOSSs. - In case of direct integration (API) method, validation issues, if any, will be provided in an API response. BOSSs API Specification will be provided once finalized in July.
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2.8 Application Support & Fees

#	Question	Answer
2.8.1	Will BDO provide application support?	Yes, once in "Production" mode, each RA will have access to BDO Helpdesk (24x7). If an issue/question could not be addressed by the Helpdesk, it will be redirected to BDO Level 2 Support, and addressed during business hours. Up to 2 authorized users per RA will be supported for the Helpdesk Program, these users will need to represent all RA's users.
2.8.2	How long will BDO provide 24/7 support for BOSSs application after going live?	The current direction is that BDO will provide support for the years to follow.
2.8.3	Who is bearing the cost of the	The cost of the system will be shared between the Bahamas Government and RAs. The details of this

	system?	are still under working and will be shared with RAs once finalized.
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2.9 Repeated Support Questions and Answers

#	Question	Answer
2.9.1	The upload button is 'greyed' out when trying to upload a new file?	The most likely reason for this is due to still having unconfirmed records in a previously uploaded file. You must remove or confirm all unconfirmed records before uploading a new file. Only records which state "No Change" or "Confirmed" should be showing. You can click on 'remove all' if you want to remove all unconfirmed records quickly. You can also use 'remove selected' to only remove certain unconfirmed records.
2.9.2	Is the helpdesk able to add/remove users?	No, the HelpDesk is not allowed to add or remove users from an RA portal. The only time we are allowed to assist with adding/removing users from a portal is when a new portal is set up OR if a system admin is the only person who has an account in the system and this system admin has left the company. In both cases an RA would know well before any changes to users are done by BDO.
2.9.3	How can I find the total number of Entities my RA has inputted in BOSSs?	Go to the 'Home' tab and do a 'blank' search. A blank search is doing a search with nothing added into the search text field. Once the search completes it will provide a total number of Companies and BO's in your RA's BOSSs database.
2.9.4	While entering dates in BOSSs Template/Blank File in Excel, a date in the DD/MM/YYYY format has been changed to a different format (e.g. MM/DD/YYYY) automatically. How can I prevent this from happening?	<p>Please check the Regional date settings in your Operating System. The "Short Date" format should be set to DD/MM/YYYY format and the OS should be restarted.</p>  <p>The screenshot shows the Windows 'Region & language' control panel window. The 'Region' tab is selected, and the 'Date and time' section is expanded. The 'Short date' format is set to 'dd/mm/yyyy'. The 'Language and font settings' dialog box is also visible, showing the 'Short date' format set to 'dd/mm/yyyy'.</p>