ESMA_QA_1339

Submission Date
19/11/2021

Status: Answer Published

Additional Information

Level 1 Regulation
Securitisation Regulation (EU) 2017/2402

Topic
Securitisation Disclosure Templates

Subject Matter
Customer Type

Question
(a) What is the exact definition of 'new' customer?
(b) Is the term ‘employee/affiliated’ limited to the originator or does it extend to the companies within the same group as the originator?
(c) What should be reported if the information regarding existing/new customer is available as of the origination of the credit card, but the information on employees is available as of the

date when it was transferred to the SSPE?
(d) Is it correctly understood that the response options CNRO and ENRO indicate that it is not recorded whether the costumer is an employee of or affiliated with the originator’s group?

ESMA Answer

19-11-2021

Original language

[ESMA 33-128-563 Securitisation Q&A, Q&A 5.3.1]

(a) For the purpose of these fields, a new customer should be understood as a client that has had no other commercial relationship with the originator or original lender, prior to the relationship assumed in the present underlying exposure for which information is being disclosed.

(b) For the purpose of these fields, the term ’employee/affiliated’ refers to all companies within the same legal group as the originator. For example, if a supermarket chain has a banking subsidiary, then the customers and employees of that banking subsidiary should be considered ‘employee/affiliated’ for the purposes of the Customer Type field.

(c) In this case, it is fine to report the information as at the date at which the underlying exposure was transferred to the SSPE.

(d) yes.