

**ANNEX** to the **Storied Data** response to the ESMA Consultation on the securitisation disclosure template under article 7 of the Securitisation Regulation

### **I. Brief Company Presentation**

**Storied Data** was founded by a team of IT industry veterans, each boasting over 20 years of experience in various domains such as data and system integration, data quality, data governance, master data management, business intelligence, and AI. The single file format developed by our team is the culmination of over 10 years of research and is currently utilized by more than 12,000 companies worldwide. We are committed to relentless innovation and work closely with seasoned professionals in securitisation and capital markets.

Our mission at **Storied Data** is to empower business users to analyse, publish smart dynamic data-centric documents, and distribute bespoke content at scale, in full autonomy. We strive to provide intuitive tools and solutions that enable organizations to harness the power of data effectively and make informed decisions with confidence.

### **II. Securitisation multiple reporting framework and data format create unnecessary burdening reporting costs and delays**

The proliferation of overlapping and duplicated reporting requirements, alongside various file formats, imposes significant costs, reporting delays, and risks of data errors or missing information. Many reporting entities grapple with data sourced from disparate systems, necessitating integration and subsequent data interchange to meet formatting requirements.

To achieve this, each reporting entity must leverage Extract, Transform, Load (ETL) processes, data quality measures, business intelligence tools, and other technologies to prepare and submit data. Additionally, each "data consumer" (infosumer) may be required to allocate resources for implementing APIs to retrieve data and then utilize reporting technology to convert data into decision-making reports. This lengthy and cumbersome chain of processes is time-consuming, error-prone, and financially burdensome.

### **III. SURF : a single multi-sectoral interactive analytical reporting and information tool**

1- Description: SURF introduces a groundbreaking dHTML document format that seamlessly integrates traditional document functionality with advanced application capabilities, culminating in a versatile InfoApp.

This singular file, termed an InfoApp, combines various essential functions:

- a- Acting as a data carrier with embedded data.
- b- Offering analytical features such as visualization, aggregations, filtering, and more.
- c- Conducting data validation upon loading.
- d- Enabling data export in multiple formats ( xml, json, csv, xhtml, xls and any other embedded formatting tags e.g., XBLR) at any desired level (individual row data or aggregated subsets), among other functionalities.

The Securitisation Unified Reporting File (SURF) boasts portability; it can be accessed via URL, sent via email, or easily uploaded and downloaded. With its user-friendly design, end users can effortlessly open SURF using any web browser, eliminating the need for specialized hardware, software, or IT skills. Moreover, the data within the file can be extracted or processed by machines, enhancing its accessibility and usability.

## 2- Process Efficiencies and Savings:

a- Business users can swiftly create a new template for the Reporting Entity within 1-2 days, accompanied with sample data.

b- Reporting Entities can populate templates from multiple data sources. For instance, client Eurobank utilizes 9 data sources to populate a template, with the update process completing in a few minutes. Automation of template population with data can be achieved seamlessly via APIs.

c- The data undergoes comprehensive validation by the template; mandatory fields without inputs prevent the rendering of the template. Furthermore, human-in-the-loop validation plays a crucial role, as experts can identify data errors in fully rendered reports that may elude Data Quality engines. Incorporating human oversight minimizes anomalous errors that are challenging for data quality systems to detect. Detecting errors in raw data is labour-intensive, but experts can easily catch them in fully rendered reports, a task difficult for machines.

d- Templates can be submitted to the receiving Data Stakeholder via email, upload, or other standard file transmission technologies. The receiving Data Stakeholder can extract or machine-read the data or subsets of the data in xml, json, csv, xhtml and xls formats, integrating them into other systems. Any other embedded formatting tags (e.g., xblr) are also extractable.

e- The receiving Data Stakeholder has the flexibility to repurpose the template by populating it with additional custom data for investors and decision-makers. Automation of this process allows personalized templates to be automatically dispatched to investors.

f- Templates can be effortlessly versioned for each institution without compromising data interchange between systems, as they are fully tagged.

This streamlined process eliminates the need for complex ETL (Extract, Transform, Load), DQ (Data Quality) rules engines, DG (Data Governance), MDM (Master Data Management), APIs, report development (Business Intelligence technologies), and information and report distribution technologies.

#### **IV. Selected public-facing Structured Finance interactive InfoApps released by European Market Associations**

**European Mortgage Federation and European Covered Bond Council** :The EMF Data Hub is the analytical complement to their 700-page statistical book

<https://hypo.org/emf/publications/data/>

**PCS - Prime Collateral Securities** : Website inset with instant interactive insights into PCS up to date certification per sector.

<https://pcsmarket.org/the-great-library/sts-market-data/>

**VdP - Verband Deutscher Pfandbriefbanken**: Green Pfandbrief Issuance online Dashboard developed by VdP without IT support.

[https://www.pfandbrief.de/site/de/vdp/sustainable\\_finance/Pfandbriefe/Nachhaltige-Emissionen.html](https://www.pfandbrief.de/site/de/vdp/sustainable_finance/Pfandbriefe/Nachhaltige-Emissionen.html)

**EDW - European DataWarehouse**: Instant insights into Italian SME securitisation activity complementing row transaction data. <https://storieddata.com/wp-content/uploads/Demo-Files/Euro-Data-Warehouse-Barometer-Report.html>