

Response of the Global Legal Entity Identifier Foundation (GLEIF) to the European Banking Authority's (EBA) Consultation on the draft technical standards to support the centralised EBA Pillar 3 data hub

November 2024

The Global Legal Entity Identifier Foundation (GLEIF) is pleased to provide comments to the European Banking Authority's (EBA) consultation on the draft technical standards to support the centralised EBA Pillar 3 data hub.

GLEIF would like to provide comments to Question 1: Do you agree with the proposed IT solutions that would support the implementation of the P3DH to Large and Other institutions? If not, please explain the reasons why.

Yes. GLEIF agrees with the proposed IT solutions that would support the implementation of the P3DH to Large and Other institutions, particularly the use of vLEI to assist these institutions in electronically submitting all required information to the EBA under Titles II and III.

The vLEI is a solution for digital organisational identity. The vLEI fulfils the requirements for the signing and submission of Pillar 3 reporting and the verification of these submissions as outlined in the Discussion Paper published by the EBA on 14 December 2023. The vLEI will provide the user identity management solutions for submissions to the Pillar 3 Data Hub (P3DH) addressing the identification, authentication, authorisation, security and management of users in charge of submitting information.

The vLEI has been designed as a scalable and secure solution to authenticate and bind the legal entity and its authorized representatives cryptographically, and can verify the representative's authority to submit EBA Pillar 3 data on the EUCLID platform efficiently. The vLEI also will provide a standardized, verifiable identity layer that reduces the manual overhead associated with submissions of reporting frameworks, thereby simplifying the overall Pillar 3 data collection ecosystem process.

The vLEI as an open, commercially neutral and global identity organizational identity solution will provide to the EBA and the submitting entities these key benefits:

- **Authenticates**
 - Each vLEI requires an underlying LEI that matches the file submitter legal entity code.
- **Combines identification and authentication**

- Decentralized identification and verification for organizations as well as the people who represent their organizations either in official or functional roles.
- **Enables delegation of authority**
 - Allows for more efficient management and operational effectiveness within the organization by enabling the submitting entities to manage in a more flexible manner internal workflows regarding the assignment or transfer of authority, such as changes in fillers, proxies, etc.
- **Solves the common problem of lack of trust and the costs involved for creating trust**
 - Because the vLEI leverages the well-established Global LEI System (GLEIS), which is the only open, standardized and regulatory-endorsed legal entity identification system, it can establish digital trust between all organizations, everywhere.
 - The vLEI ecosystem and infrastructure is a Zero Trust Architecture (ZTA) for organizational identity.
- **Delivers decentralized digital identity solution that is interoperable**
 - Supports modern technical networks, in which there are many interconnected zones, cloud services, connections to remote and mobile environments, and connections to IoT devices.
- **Enables credential management for organizational representatives in report submissions and various business transactions**
 - Allows control of the assignment and management of credentials by the submitting entities to persons representing their organizations in any additional report submission frameworks and for other business transactions and use cases in which the banks would operate.

We hope this feedback is helpful as the EBA continues developing the draft technical standards to support the centralized EBA Pillar 3 data hub. Should the EBA have any additional questions or require further clarification, GLEIF is fully available to assist.