

DAC6

(New EU-Directive within the tax area)

The purpose of this guide is to summarise reporting requirements under “DAC6” and describe how its implementation will affect our policyholders and their advisers.

What is DAC6?

DAC 6 is the most recent amendment to EC Council Directive on Administrative Cooperation 2011/16/EU which came into force on 25th June 2018.

Under DAC6, legal advisers, tax advisers, intermediaries and financial institutions among others may have reporting responsibilities when advising upon or entering a cross border arrangement. A cross border arrangement occurs when the participants in the arrangement are tax resident in jurisdictions outside of Ireland.

SEB Life International insurance products are standardised unit linked policies. As the policies are issued from Ireland to clients living elsewhere (cross border), each product will be treated as a reportable cross border arrangement.

What is reported and by whom?

The promoters and/or service providers of cross border arrangements are responsible for the relevant DAC6 reporting. SEB Life International will undertake all standard product arrangement reporting to the Irish Revenue Commissioner (Ireland's tax authority) who will then pass this information to the tax authority in the country of the policyholder's tax residence on request.

The adviser should assess each of their client's situations individually to ensure that no further or additional reporting is required in addition to the SEB Life International insurance product cross border arrangement. Advisers should keep a record of the policy details and associated 'Arrangement ID' (please see our Website or product literature for details of the Arrangement ID).

Reporting will begin from 31st January 2021.

What information is reported?

The type of information to be reported includes:

1. Policyholder Name and Intermediary Name
2. Whether the Policyholder is an 'individual' or an 'entity'
3. Date and place of birth for individuals / date of origin for entities
4. Country of tax residence
5. Tax Identification Number
6. Address
7. The persons that are associated enterprises (advisers and the custodian bank) to each relevant taxpayer and the member state to which they are linked
8. Information of each hallmark that makes the arrangement reportable
9. Arrangement description
10. Reference number assigned to the arrangement (arrangement ID)
11. The value of the arrangement (value of premium at inception)
12. The issue date of the arrangement (inception date of insurance policy)

SEB Life International will review all existing individual and legal entity policies in force from 25th June 2018, and may because of these reviews, request more information and/or documentation to be provided.