



COMMENTS RECEIVED DURING THE PUBLIC CONSULTATION PHASE ON THE DRAFT
CNMV TECHNICAL GUIDE ON THE APPOINTMENT OF UNREGISTERED ENTITIES OR
PERSONS AS CIS ADVISERS

23 October 2020

On 22 September 2020, the Spanish National Securities Market Commission submitted for public consultation the draft Technical Guide on the appointment of unregistered entities or persons as CIS advisers. The deadline for submitting comments ended on 14 October 2020.

Below are the links both to the document made available for public consultation and to the comments received in relation to it:

A.- Documents put out for public consultation:

1. [Draft Technical Guide on the appointment of unregistered entities or persons as CIS advisers.](#)

B.- Comments received (in alphabetical order):

1. [ANDBANK WEALTH MANAGEMENT, SGIIC, S.A](#)
2. [ASEAFI.- Asociación de Empresas de Asesoramiento Financiero \(Spanish Association of Financial Consultancy Firms\)](#)
3. [The CNMV's ADVISORY COMMITTEE](#)
4. [Consejo General de Economistas de España \(General Council of Spanish Economist Associations\)](#)
5. [The law firm Ramón y Cajal Abogados](#)
6. [INVERCO \(The Spanish Association of Collective Investment Schemes and Pension Funds\)](#)

THE INSTITUTIONS DIRECTORATE-GENERAL
INSTITUTION AUTHORISATION AND REGISTRATION DEPARTMENT
THE SPANISH NATIONAL SECURITIES MARKET COMMISSION
Edison, 4
28006 MADRID