

Global Forum on Transparency and Exchange of Information for Tax Purposes: Luxembourg 2019 (Second Round)

**PEER REVIEW REPORT ON THE EXCHANGE
OF INFORMATION ON REQUEST**

March 2019
(reflecting the legal and regulatory framework
as at December 2018)

Table of contents

Reader's guide	5
Abbreviations and acronyms	9
Executive summary	13
Overview of Luxembourg	21
Part A: Availability of information	29
A.1. Information on ownership, beneficial ownership and identity.	29
A.2. Accounting records	59
A.3. Banking information	65
Part B: Access to information	73
B.1. Competent authority's ability to obtain and provide information	73
B.2. Notification requirements, rights and safeguards	82
Part C: Exchanging information	89
C.1. Exchange of information mechanisms	89
C.2. Exchange of information mechanisms with all relevant partners	99
C.3. Confidentiality	100
C.4. Rights and safeguards of taxpayers and third parties.	105
C.5. Requesting and providing information in an effective manner	106
Annex 1: List of in-text recommendations	117
Annex 2: List of Luxembourg's EOI mechanisms	119
Annex 3: Methodology for the review	125
Annex 4: Luxembourg's response to the review report	131