e-Authorisation – Notification of short positions – Position holder with a separate reporting entity

Information in this document can be applied when the position holder is a company without a Finnish business ID and **reporting of net short positions is outsourced to a separate service provider** as reporting entity.

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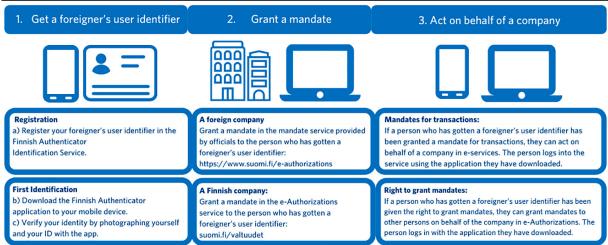
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1 Introduction

FIN-FSA introduces its electronic services platform for reporting short positions that requires strong authentication from users. To be able to report through the new platform, foreign companies must register with Digital and Population Data Services Agency's authorisation with an application service in Suomi.fi e-Authorisations portal.

In Suomi.fi e-Authorisations companies and organisations can authorise someone else to act on their behalf. When a company, e.g. foreign company without a Finnish business ID, cannot independently grant mandates in Suomi.fi e-Authorisations, the Digital and Population Data Services Agency can register the mandates on the basis of a mandate application. A mandate is an electronic power of attorney, the details of which are entered in the authorisation register. The time required for processing an application from the date on which the application is received can vary from a week to several weeks.

Simplified diagram of the process:



- To use services electronically, foreign citizens must obtain a foreigner's identifier (UID) and the Finnish Authenticator app through the <u>Finnish Authenticator</u> <u>Identification Service</u>.
- 2) The position holder and the reporting entity (both foreign companies) must apply for the mandates through the authorisation with an application service because there is no basic register of foreign companies from which the representation rights of a foreign company can be determined.
 - a. Position holder applies for the **right to grant a mandate** for its representative (*employee*)
 - b. Reporting entity applies for the representative's right to grant a mandate for its representative (employee)
- 3) After both applications have been processed successfully by the with Digital and Population Data Services Agency, the representatives of the companies can grant mandates in Suomi.fi e-Authorisations as follows:
 - a. First, the *position holder* grants a **mandate for transactions** to the reporting entity (*company*)
 - b. Once the mandate for transactions has been granted the representative of the reporting entity can grant a mandate to represent to its employee who will carry out the daily reporting process for the position holder.
- 4) The representative of the reporting entity can log in the <u>FIN-FSA's electronic services platform</u> and is able to report short positions on behalf of the position holder.

2 Mandate types

There are four mandate types for entities, two related to carrying out transactions on behalf of one's own entity and two related to mandates received from assignors.

- A person or an organisation (assignee) who has been granted a mandate for transactions may carry out transactions related to entity's (assignor) own affairs on its behalf.
- A person given a right to grant a mandate may grant mandates for transactions on behalf of an entity (assignor). If such a person needs to act on behalf of the assignor, they must also give themselves a mandate for transactions.
- Assignors may grant a mandate for transactions to an entity (assignee). Only
 employees who have been granted a mandate to represent can carry out
 transactions using the mandates for transactions granted by assignors.
- A person who has the right to grant mandates on behalf of an entity may also grant an employee a mandate, which of a type representative's right to grant a mandate. Such an employee may grant other employees mandates to represent the assignors and request mandates for transactions from other organisations or persons.

3 Finnish Authenticator Identification Service

The foreign citizen identification service, or the Finnish Authenticator Identification Service, allows foreigners without Finnish personal identity code to use Finnish public administration e-services that have introduced the identification using the Finnish Authenticator application. The identification using the application is intended for foreigners who need to act on behalf of the company, but do not have a Finnish personal identity code or a Finnish identification token.

The foreigner's user identifier (UID) needs to be acquired for the **persons given the right to grant a mandate** <u>before</u> applying for authorisation with an application. It is also recommended to acquire the UID for the **persons who will be granted a mandate for transactions or a mandate to represent** as early in the process as possible.

In the <u>Finnish Authenticator Identification Service</u>, a foreign citizen registers his/her foreigner's user identifier (UID) and verifies his/her identity using the Finnish Authenticator application. In connection with this first identification, the user will take a photo of oneself, as well as of his/her passport or national ID card. The identification service will confirm the person's identity if the photo and the information in the identity document match.

After registering and initiating the use of the application, foreign citizens can log into the e-service using their user ID, password and application PIN.

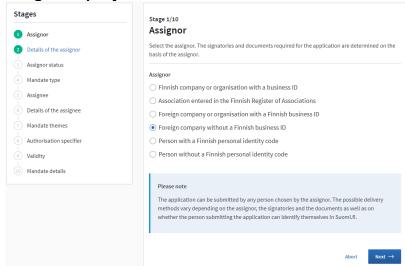
Detailed instructions and FAQ: Finnish Authenticator Identification Service - Suomi.fi

4 Authorisation with an application / Position holder

After the foreigner's user identifier has been acquired for at least to the person who will be given **a right to grant a mandate**, the authorisation application can be submitted. The application and related instructions are available in Suomi.fi portal: Authorisation with an application - Suomi.fi

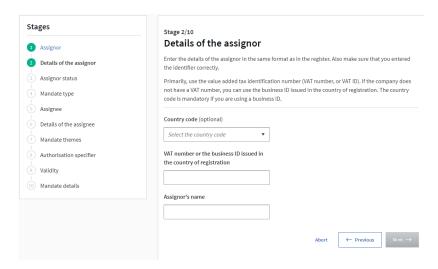
Stage 1: Assignor

In the first stage of the application, you will select the type of the assignor. Select **Foreign company without a Finnish business ID**.



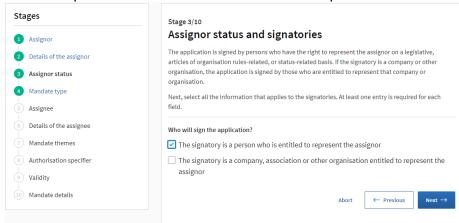
Stage 2: Details of the assignor

In stage 2, you are required to submit the country code, VAT number/business ID and the assignor's name. Note that the assignor's name should be the name of the company with the corresponding ID.



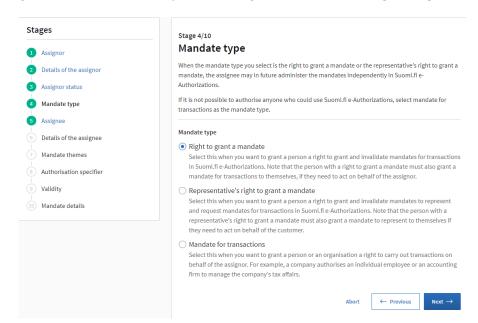
Stage 3: Assignor status and signatories

Stage 3 requires you to select the signatory. Choose the suitable option. **The signatory is a person who is entitled to represent the assignor** is the most common option and is therefore used in this example.



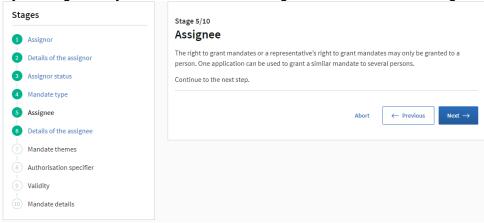
Stage 4: Mandate type

In stage 4 you can select the mandate type. To select a person given the right to grant a mandate within your own organisation, select **Right to grant a mandate**.



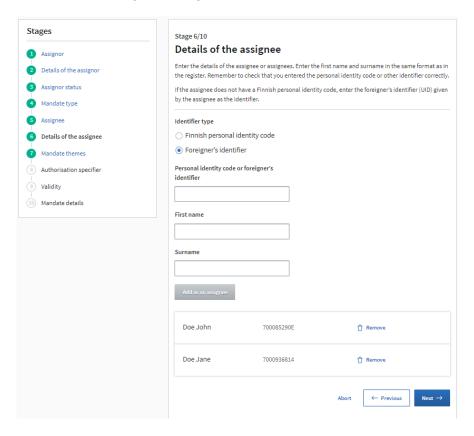
Stage 5: Assignee

By clicking Next, you can move forward to give the details of the assignee.



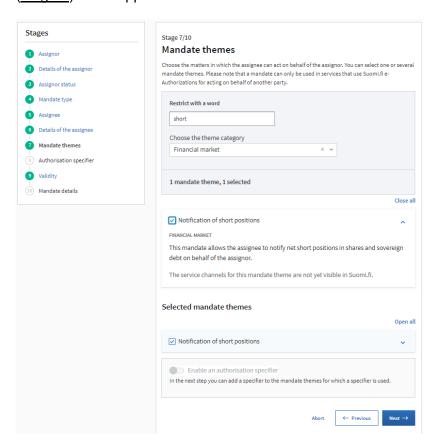
Stage 6: Details of the assignee

Here you can name the persons within your organisation who will be given the right to grant a mandate. Select **Foreigner's identifier** and enter the previously acquired UID and the first name and last name of the person and select **Add as an assignee**. Note that the right to grant a mandate can be given to several individuals. It is recommended to give the right to at least two separate persons.



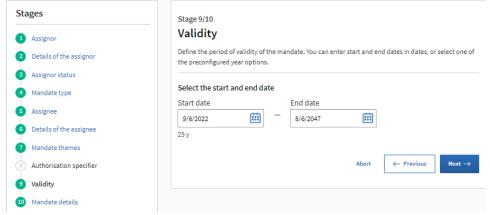
Stage 7: Mandate themes

In stage 7 you can specify the themes in which the assignee can act on behalf of the assignor. The theme for reporting net short positions is **Notification of short positions**. You can specify multiple themes if necessary. Authorisation specifier (stage 8) is not applicable for this theme.



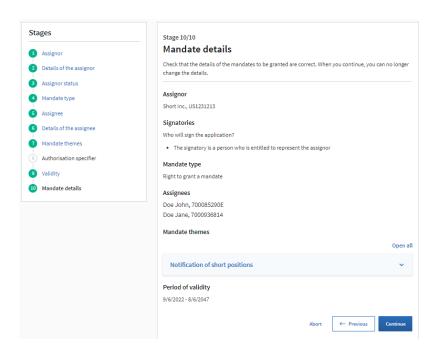
Stage 9: Validity

This stage allows you to enter the period of validity for the mandate. Please note that the mandate service must be renewed every 3 years regardless of your selection.



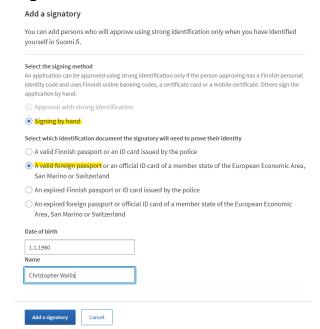
Stage 10: Mandate details

Stage 10 shows a summary of the information you are submitting. If there are errors, you can return to previous stages for corrections. If the information is correct, click **Continue**. Please note that when you continue, you can no longer change the details.



In the final stage you are required to add the following information to the application:

1. Signatories



Add signing method: **Signing by hand**; Identification document: **A valid foreign passport**; Date of birth and Name.

After all signatories have been added, Lock the signatories and select Next:

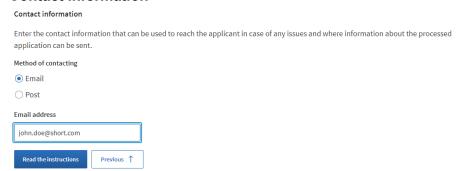


2. Submitting an application



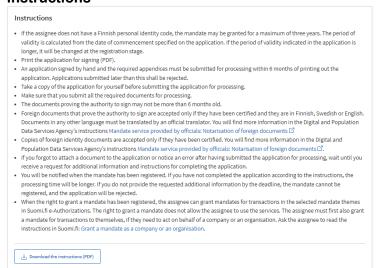
Select I will send the application by post and then Next.

3. Contact information



Select Email, fill in the email address and then select Read the instructions.

4. Instructions



Read the instructions and act accordingly.

5. Required documents

After completing the stages above, you can download the application for signing. When you submit the application for processing, make sure that all the listed documents are attached and are notarised according to the requirements listed on the website: Notarisation of foreign documents | Digital and population data services agency (dvv.fi).

Do not submit your application until you have all of the necessary documents.

When all the documents are in order, send the application by post to:

Digital and Population Data Services Agency P.O. Box 1003 FI-00530 Helsinki FINLAND

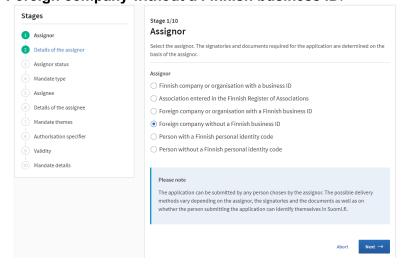
The time required for processing an application from the date on which the application is received can vary from a week to several weeks.

5 Authorisation with an application / Reporting entity

After the foreigner's user identifier has been acquired for at least to the person who will be given a **representative's right to grant a mandate**, the authorisation application can be submitted. The application and related instructions are available in Suomi.fi portal: Authorisation with an application - Suomi.fi

Stage 1: Assignor

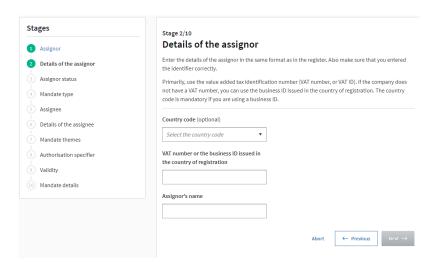
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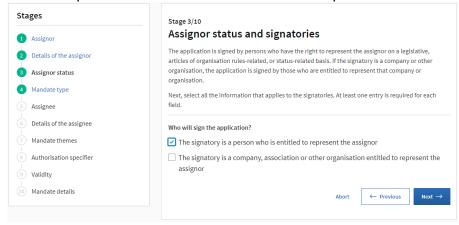
Stage 2: Details of the assignor

In stage 2, you are required to submit the country code, VAT number/business ID and the assignor's name. Note that the assignor's name should be the name of the company with the corresponding ID.



Stage 3: Assignor status and signatories

Stage 3 requires you to select the signatory. Choose the suitable option. **The signatory is a person who is entitled to represent the assignor** is the most common option and is therefore used in this example.

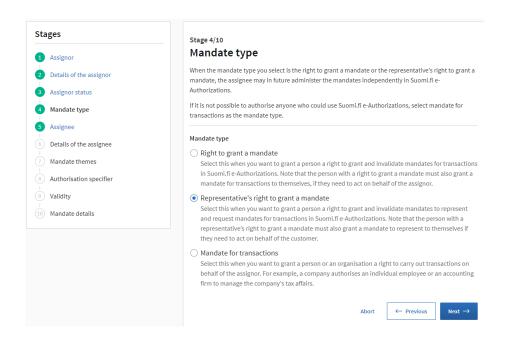


Stage 4: Mandate type

In stage 4 you can select the mandate type. Select **Representative's right to grant a mandate**.

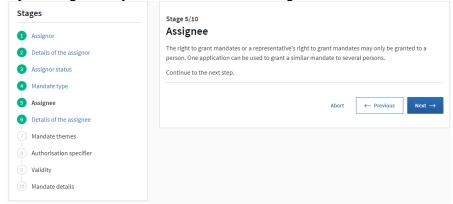


Instruction



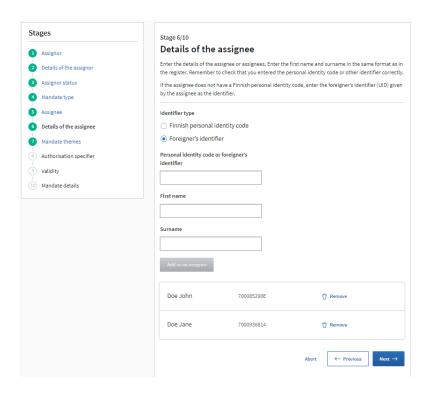
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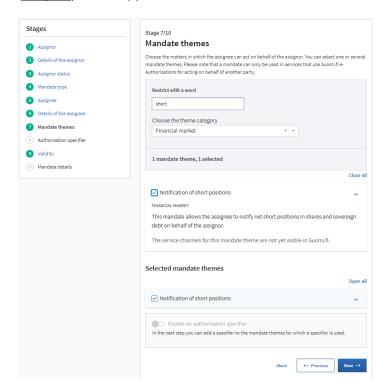
Stage 6: Details of the assignee

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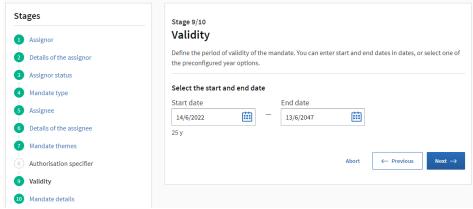
Stage 7: Mandate themes

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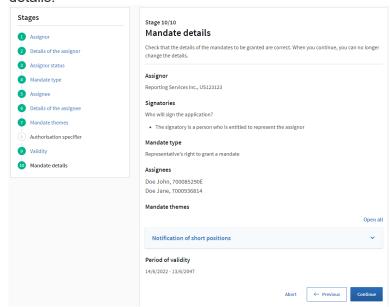
Stage 9: Validity

This stage allows you to enter the period of validity for the mandate. Please note that the mandate service must be renewed every 3 years regardless of your selection.



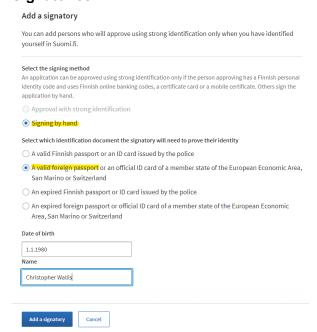
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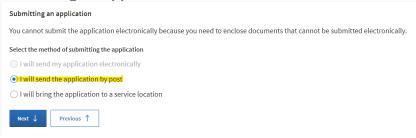


Add signing method: **Signing by hand**; Identification document: **A valid foreign passport**; Date of birth and Name.

After all signatories have been added, Lock the signatories and select Next:



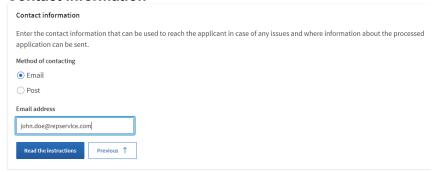
2. Submitting an application



Select I will send the application by post and then Next.

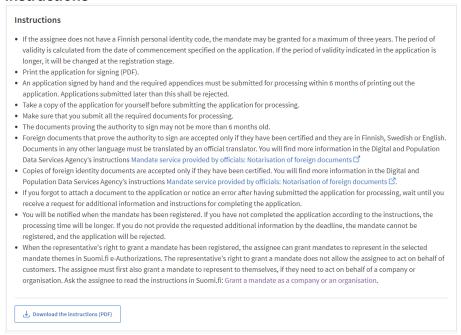


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The time required for processing an application from the date on which the application is received can vary from a week to several weeks.

6 Suomi.fi e-Authorisations

After the applications referred to in the previous stages are successfully processed (i.e. a confirmation has been received from Digital and Population Data Services Agency) for **both** the position holder and the reporting entity, the assignees of the companies are able grant mandates in <u>Suomi.fi e-Authorisations</u> in the following order:

- 1. The assignee of the position holder grants **a mandate for transactions** to the reporting entity (*company*)
- 2. The assignee of the reporting entity grants **a mandate to represent** to its employee who will carry out the daily reporting process for the position holder.

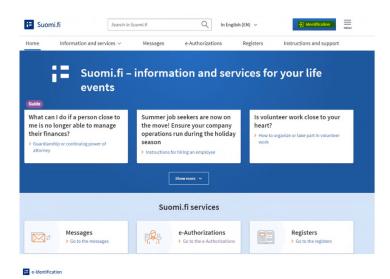
Please note that the persons who will be granted the mandate to represent must have acquired the foreigner's user identifier (UID) beforehand (see page 2 for instructions).

If the assignees of the reporting entity themselves need to act on behalf of the position holder (i.e. carry out daily reporting), they must grant themselves a mandate to represent. The representative's right to grant a mandate does not allow the assignee to use the services.

More information is available on Suomi.fi website: <u>Grant a mandate as a company or an organisation - Suomi.fi</u> and below you will find a step-by-step guide.

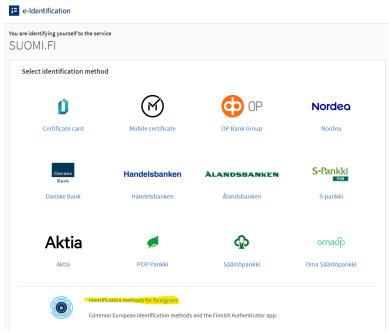
6.1 Position holder grants a mandate for transactions to the reporting entity

The assignee of the position holder logs in to the Suomi.fi portal (https://suomi.fi) with the previously created foreigner's user identifier (UID). To log in, click on the **Identification** button at the top right of the site.

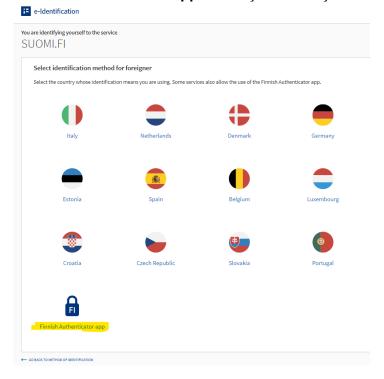




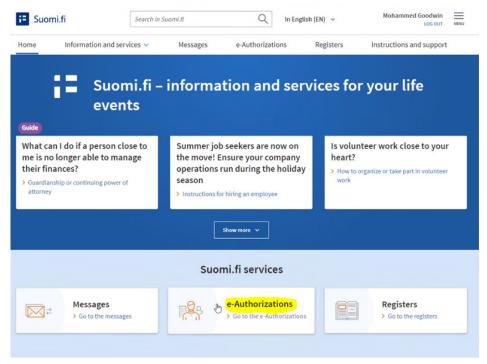
At the bottom of the view that opens, select **Identification methods for foreigners**.



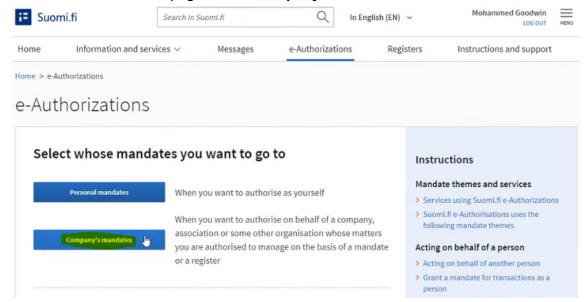
When selecting the identification method for foreigners, always choose the option **Finnish Authenticator App** even if your country's identification means are available.



After successfully logging in, select e-Authorisations on the front page.

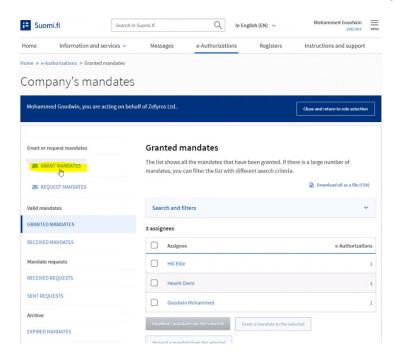


On the e-Authorisations page, select **Company's mandates**.



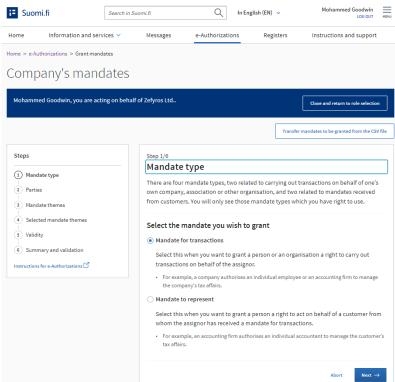
Select the company you want to act on behalf of and continue to the e-service.

On the Company's mandates page you can view, grant and request mandates. Select **Grant mandates** in the upper left corner of the page.



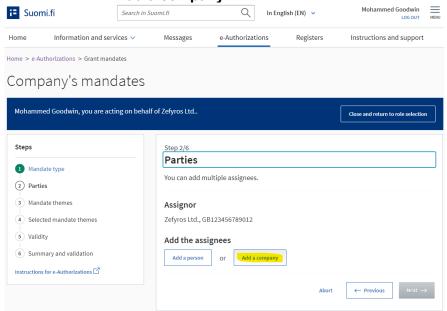
Step 1: Mandate type

In the first step you can select the mandate type you wish to grant. Select the option **Mandate for transactions**.

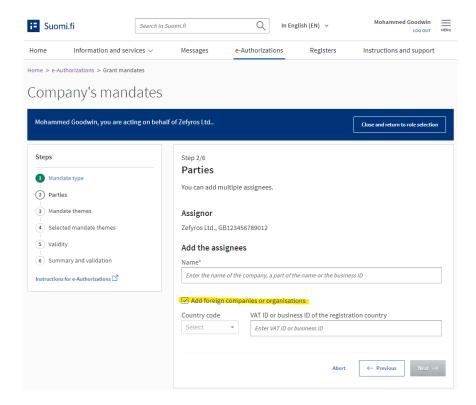


Step 2: Parties

In the second step you will determine the reporting entity who will be granted the mandate. Select **Add a company**.

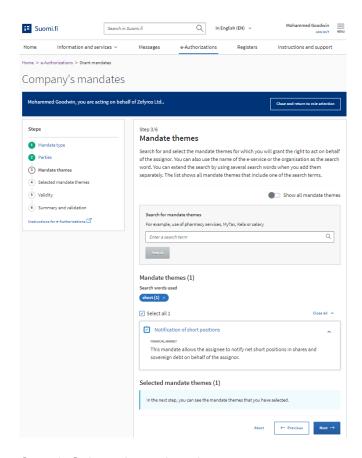


Select **Add foreign companies or organisations**, select Country code and enter the VAT or business ID of the reporting entity and click **Add**. Please note that you must use the ID the reporting entity has given in its authorisation application. The application of the reporting entity must be successfully processed by the Digital and Population Data Services Agency in order to continue with the process.

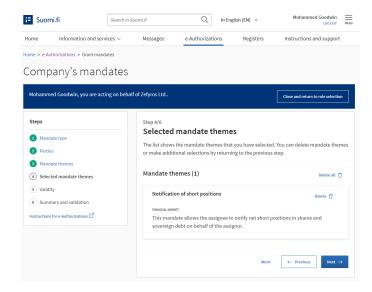


Step 3: Mandate themes

In the third step you will choose the mandate themes for which you will grant mandates. For reporting net short positions to FIN-FSA, the correct theme is **Notification of short positions**. The simplest way to find the correct theme is to use the search function.

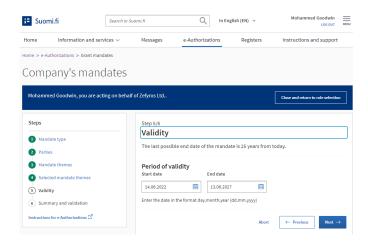


Step 4: Selected mandate themes



Step 5: Validity

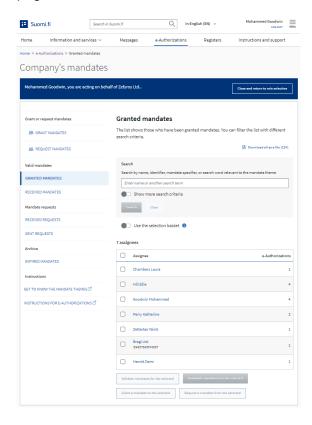
In the fifth step you can define the validity period for the chosen mandate. Please note that regardless of your selection the mandate will expire in three (3) years from the current date.



Step 6: Summary and validation

In the sixth step you are required to check that all the information regarding the mandate you are about to grant is correct. After checking, click **Validate** on the bottom right.

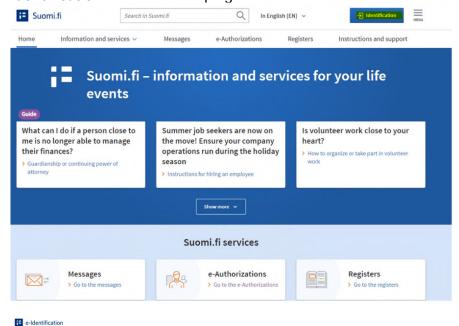
After successfully granting a mandate, it will be shown on the Company's mandates page under the **Granted mandates** menu.



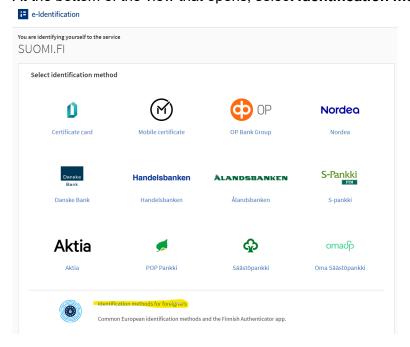


6.2 Reporting entity grants a mandate to represent to its employee

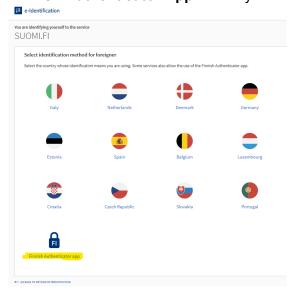
The assignee of the reporting entity logs in to the Suomi.fi portal (https://suomi.fi) with the previously created foreigner's user identifier (UID). To log in, click on the **Identification** button at the top right of the site.



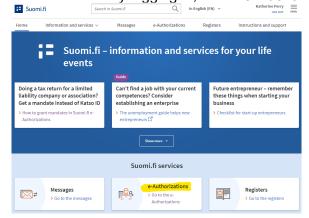
At the bottom of the view that opens, select **Identification methods for foreigners**.



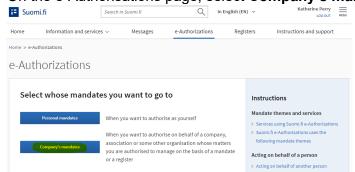
When selecting the identification method for foreigners, always choose the option **Finnish Authenticator App** even if your country's identification means are available.



After successfully logging in, select e-Authorisations on the front page.



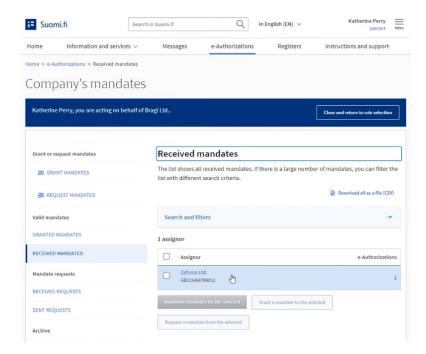
On the e-Authorisations page, select Company's mandates.



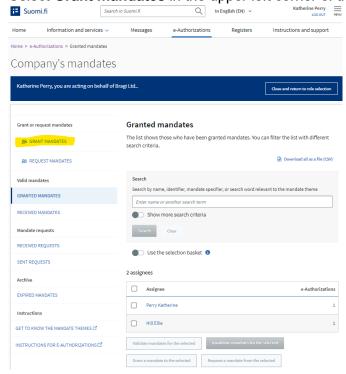
Select the company (*reporting entity*) you want to act on behalf of and continue to the e-service.

On the Company's mandates page you can view, grant and request mandates.

Select **Received mandates** and make sure the name of the position holder is shown as an assignor (i.e. it has granted a mandate).

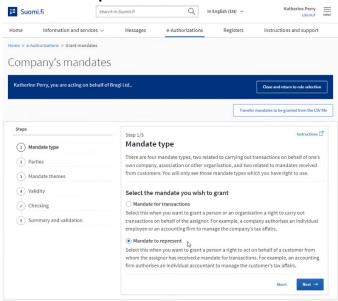


Select **Grant mandates** in the upper left corner of the page.



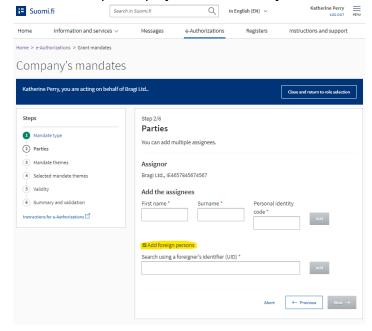
Step 1: Mandate type

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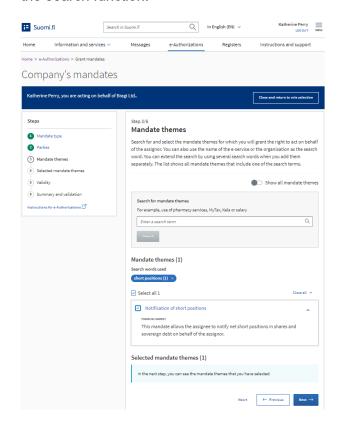
Step 2: Parties

In the second step you will determine the persons who will be granted the mandate. Select **Add foreign persons**, enter the previously acquired UID and click **Add**. You can add multiple employees, if necessary.

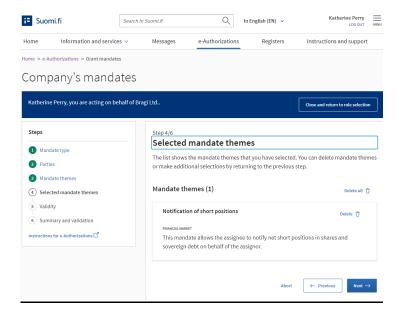


Step 3: Mandate themes

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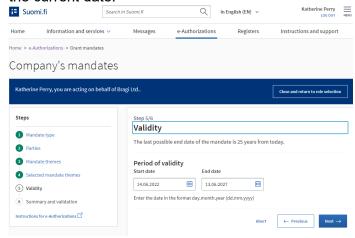


Step 4: Selected mandate themes



Step 5: Validity

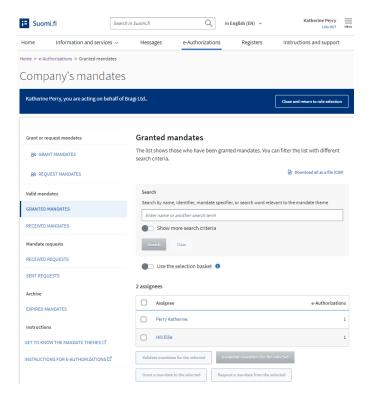
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After successfully granting a mandate, it will be shown on the Company's mandates page under the **Granted mandates** menu.



7 Contact details

Digital and Population Data Services Agency

<u>Customer service for organisations</u> helps companies and organisations in the use of Suomi.fi services.

Email: <u>organisaatiopalvelut@dvv.fi</u>
Telephone: +358 295 53 5115

Instructions and support: Information on e-Authorisations - Suomi.fi

- Grant a mandate as a company or an organisation Suomi.fi
- Acting on behalf of a company or an organisation Suomi.fi

Financial Supervisory Authority

shortselling@fiva.fi

8 Logging in the FIN-FSA's electronic services

After you have completed the previous stages, you will be able to log in the FIN-FSA's electronic services. Step-by-step reporting instructions are available on FIN-FSA's website: Notification of short positions – Sending notifications via the eServices platform (finanssivalvonta.fi)