



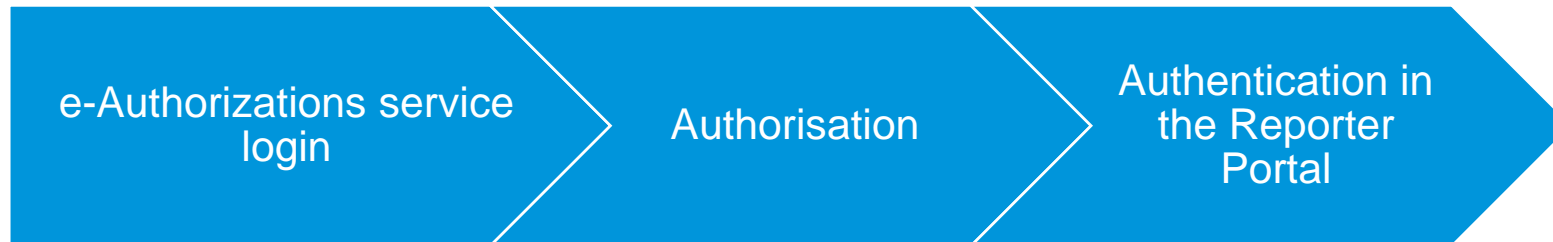
FIN-FSA
FINANSSIVALVONTA

Instructions on Suomi.fi e-services for reporters

Instructions for Suomi.fi services: e-Authorizations service, Mandate service provided by officials and Foreign user identifier (UID)

Suomi.fi authentication in the FIN-FSA's Reporter Portal

- With the introduction of the FIN-FSA's Reporter Portal, reporting entities or their service providers send official reports via the portal
 - Via the portal, entities or their service providers send reports, receive validation feedback and communicate with the FIN-FSA in matters related to reporting
 - In this document, the term 'reporting entity' always refers to the entity that has the obligation to carry out formal reporting to the FIN-FSA
- Logging in to the portal requires personal mandates to act on behalf of the reporting entity as well as strong authentication
 - Mandates are granted in the Suomi.fi e-Authorizations service
 - Strong authentication is possible with, for example, personal online banking codes or the Finnish Authenticator application



Justifications for using the Suomi.fi service

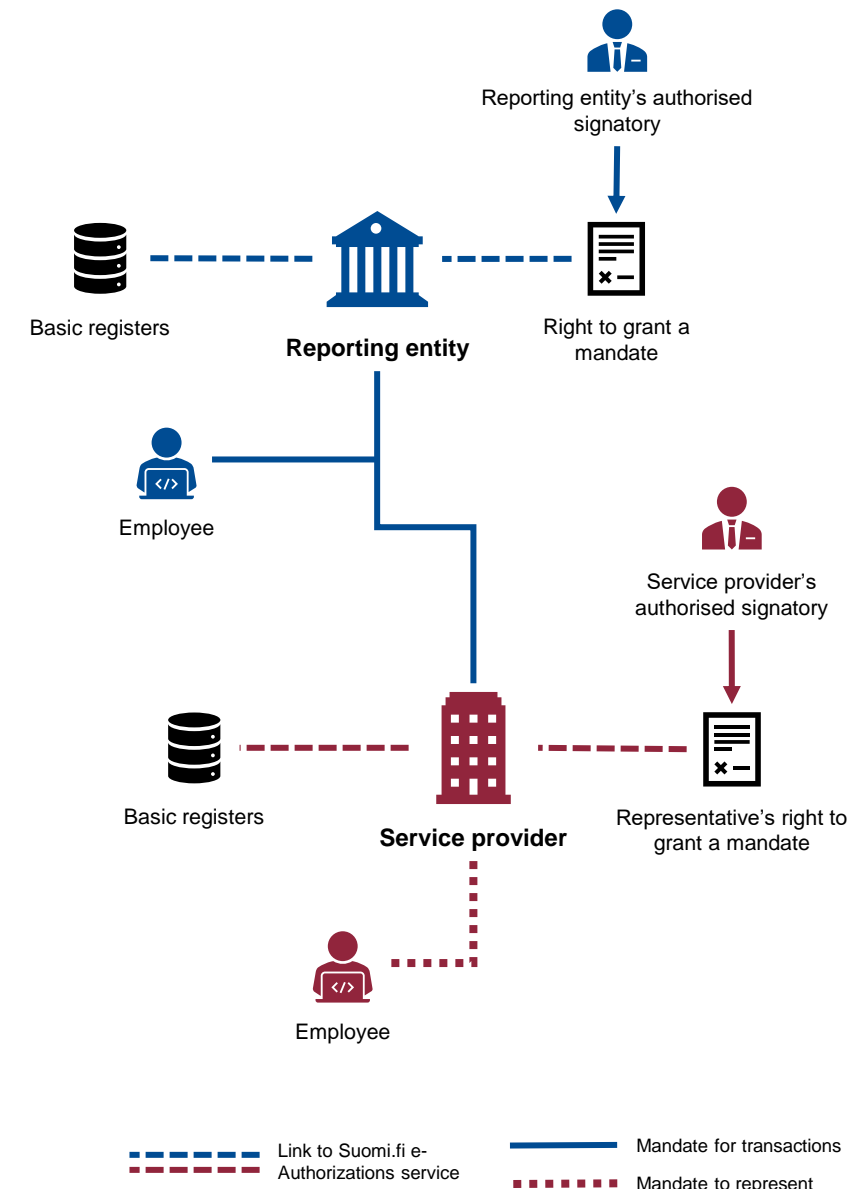
- The public sector as well as independent bodies governed by public law must utilise strong authentication in their systems
- Strong authentication has been considered to be best implemented via the Suomi.fi service
 - A large proportion of the entities required to report to the FIN-FSA are already included in the so-called basic registers used in Suomi.fi authentication
 - These entities already have what is required to identify themselves in the FIN-FSA's Reporting Portal and to manage mandates
 - The basic registers are the Trade Register, the Business Information System and the Register of Associations
- Legislation (in Finnish and Swedish)
 - Act on Information Management in Public Administration (906/2019)
 - Act on Shared Support Services for eGovernment (571/2016)
 - Ministry of Finance Decree on Provision of Shared Support Services for eGovernment (607/2016)

Authorisation



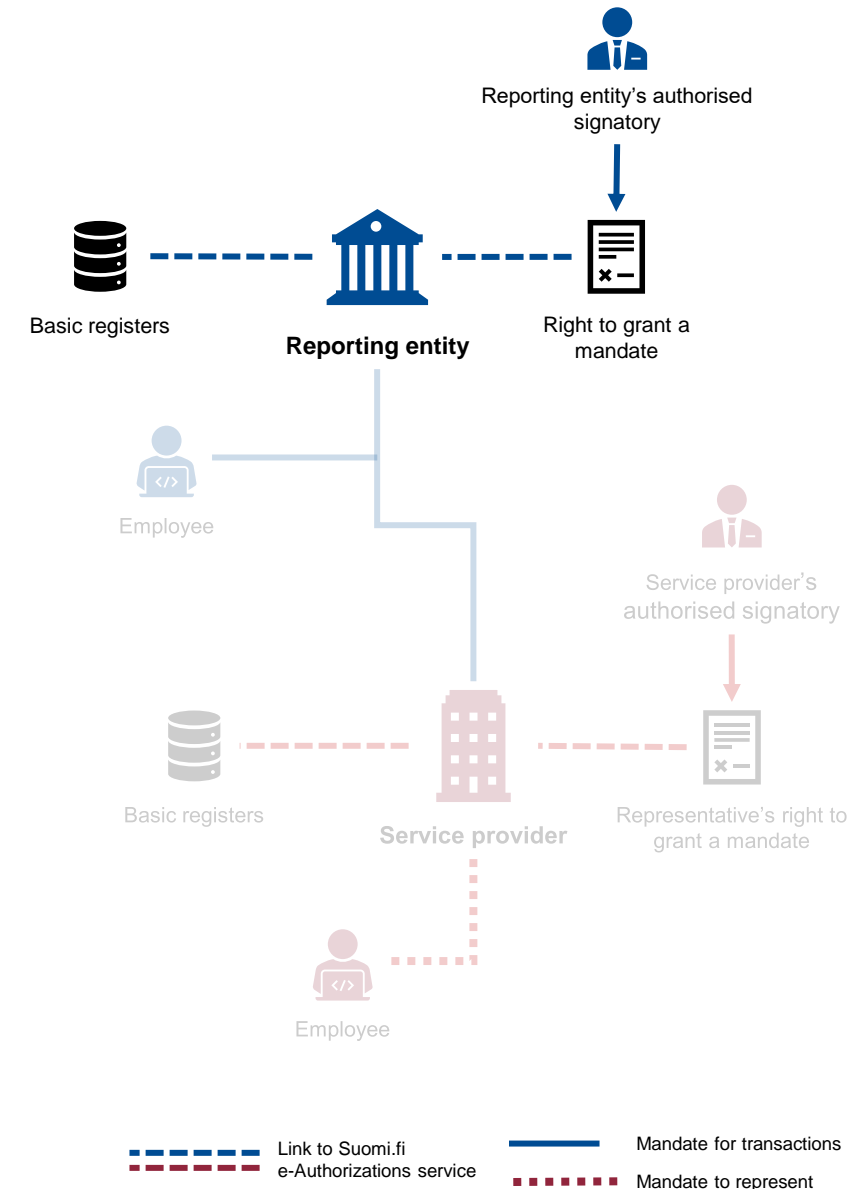
Description of authorisation

- On the right is a concise description of the Suomi.fi e-Authorizations service process, by which the reporting entity manages its mandates
- The description does not necessarily represent the authorisation for the regulatory reporting of every reporting entity, but is intended to cover as many authorisation cases as possible
- The complexity of mandate management depends on whether the reporting entity belongs to one of the basic registers and whether the reporting entity carries out regulatory reporting independently or through a service provider



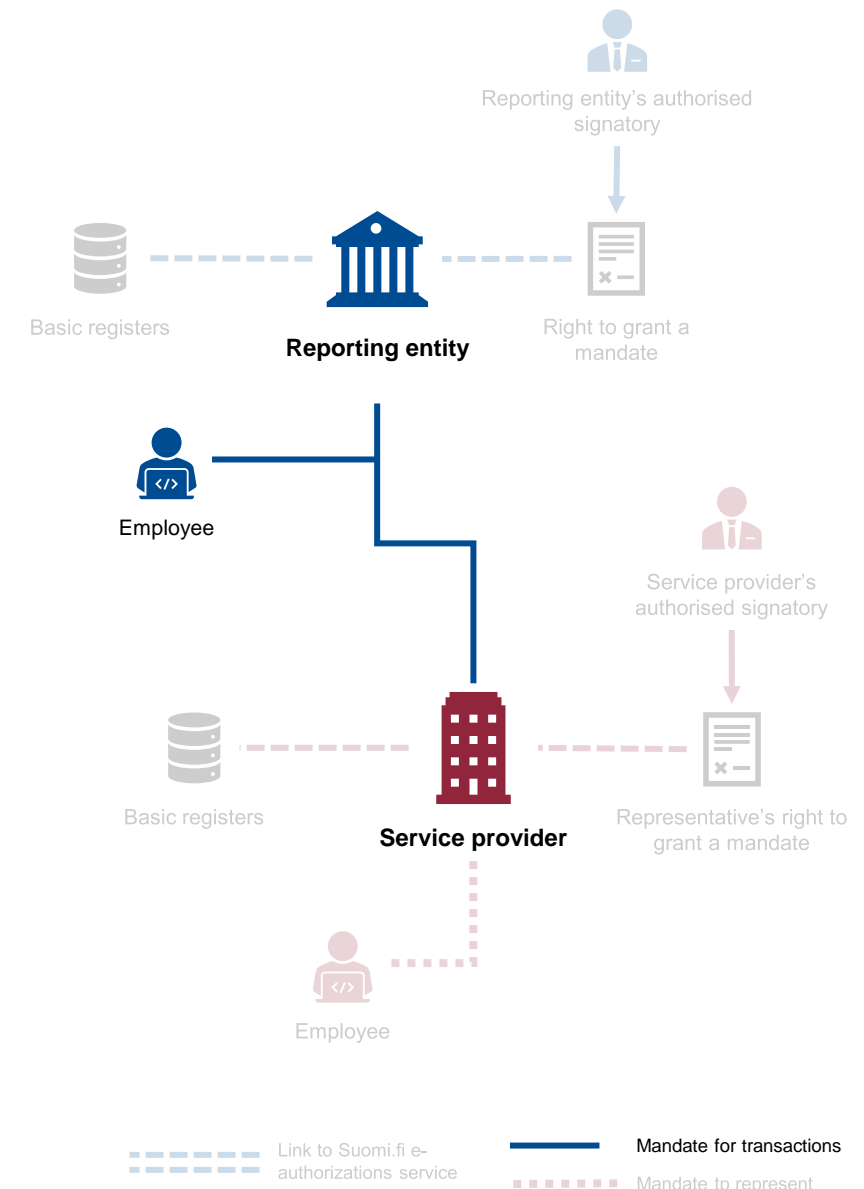
Suomi.fi e-Authorisations service login

- Management of the company's authorisation matters takes place in the Suomi.fi [e-Authorizations service](#)
 - Management includes the granting, requesting and invalidation of mandates
 - Mandates can be assigned both to employees of one's own organisation (reporting entity) or to another organisation (service provider)
- Logging in to the Suomi.fi e-Authorizations service
 - Option 1: If, for the reporting entity, representatives have been entered in one of the basic registers, then persons authorised to represent the entity that are entered in the register may log in to the Suomi.fi e-Authorizations service with their personal means of identification.
 - You can find [here](#) a list of the roles entered in the Trade Register that are authorised to act on behalf of a company (see *Acting on behalf of a company without a separate mandate*)
 - Option 2: If the reporting entity is not entered in any of the basic registers, it must apply for a right to grant a mandate via the mandate service granted by officials.
 - For more detailed instructions, see slides 11–12 and slide 17



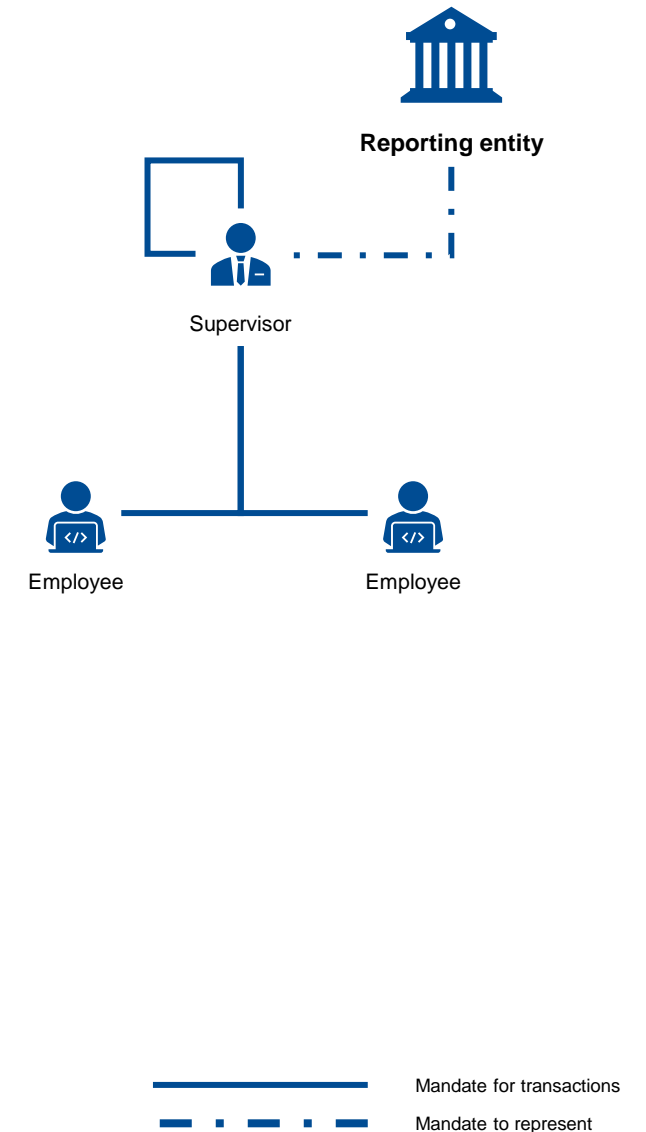
Mandate for transactions and Right to grant a mandate (1/2)

- If the reporting entity's authorised signatory is not responsible themselves for the company's regulatory reporting, then the authorised signatory may authorise another person or service provider to act on behalf of the company in Reporting Portal.
 - For example, the CEO of a reporting entity may authorise individuals in the organisation's Compliance Department to act on behalf of the company in the Reporting Portal.
- In order for the reporting entity to be able to assign mandates, the selected mandate type must be 'mandate for transactions' or 'right to grant a mandate'.
 - When the recipient of a mandate is a service provider, then the type of mandate is always 'mandate for transactions'



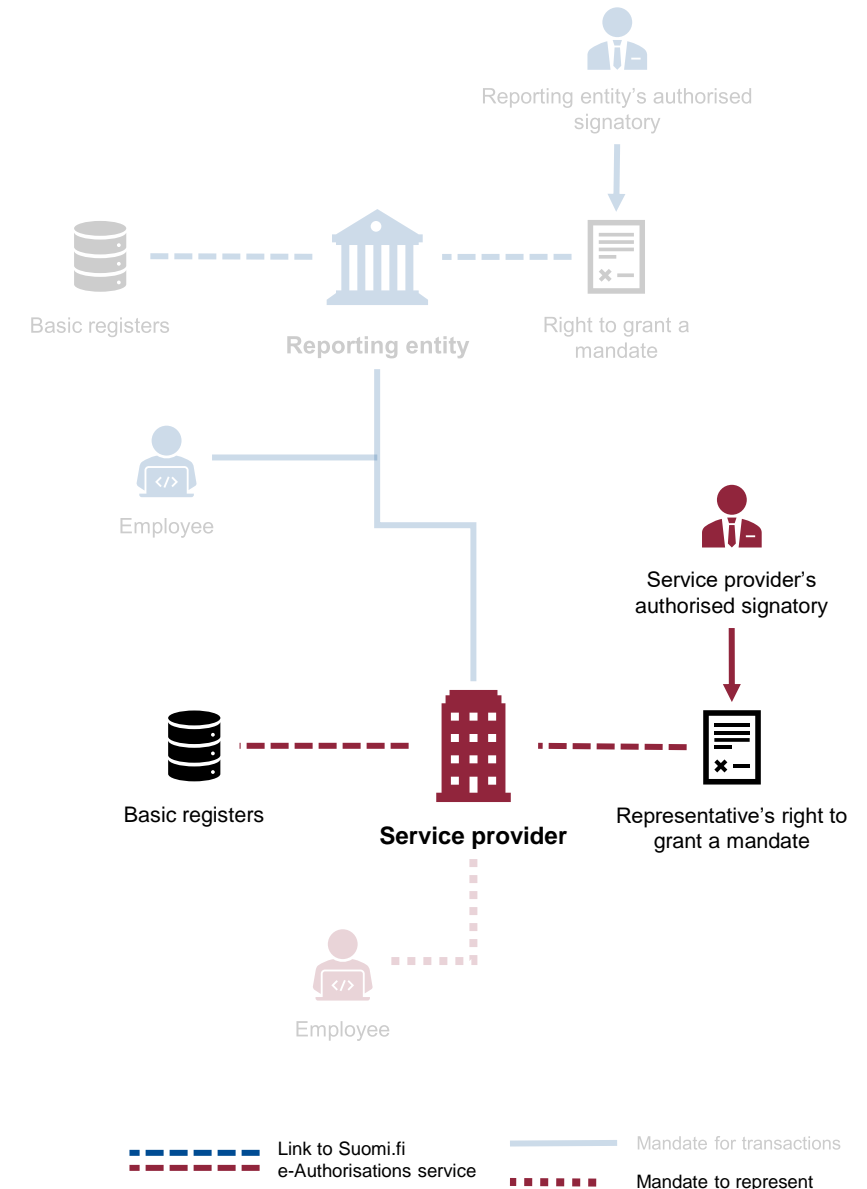
Mandate for transactions and Right to grant a mandate (2/2)

- If the entity wishes to grant a mandate to an individual whose task is to assign additional mandates within the reporting entity's organisation, the mandate in question is 'right to grant a mandate'
 - An example is a situation where the authorised signatory has assigned a regulatory reporting 'right to grant a mandate' to a manager in the Compliance Department. As a person holding the right to grant a mandate, the manager may assign mandates for transactions to other employees of the organisation
- Please note. A person with the right to grant mandates cannot act on behalf of the company in transaction services, such as in the Reporting Portal
 - If a person with the right to grant mandates wishes to act themselves on behalf of the company, then they must assign to themselves a mandate for transactions in the Suomi.fi e-Authorizations service



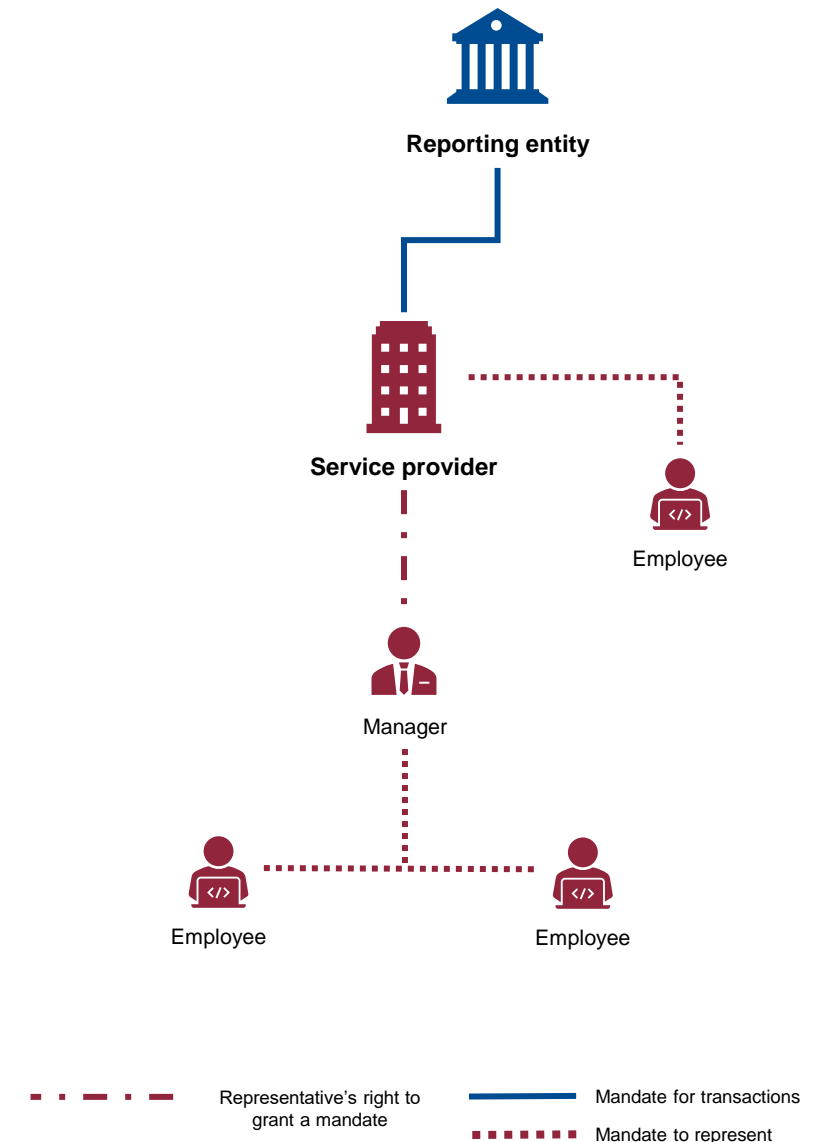
Management of service provider's mandates

- If the reporting entity handles regulatory reporting through a service provider, then the service provider must also be able to manage mandates in the Suomi.fi e-Authorizations service.
- Logging in to the Suomi.fi e-Authorizations service works on the same principles as the reporting entity's login:
 - Option 1: If the company is included in one of the basic registers, then persons authorised to represent the company that are entered in the register may log in independently to the Suomi.fi e-Authorizations service with their personal means of identification.
 - Option 2: If the company is not entered in any of the basic registers, then it must apply for mandates via the mandate service granted by officials.
 - Please note. When the service provider applies for mandates via the mandate service granted by officials, the service provider must apply for a **representative's right to grant a mandate** (see the description on the right reporting entity vs. service provider)
- The service provider may manage the mandates for transactions it has received from the reporting entity either with aid of a 'mandate to represent' or a 'representative's right to grant a mandate'.



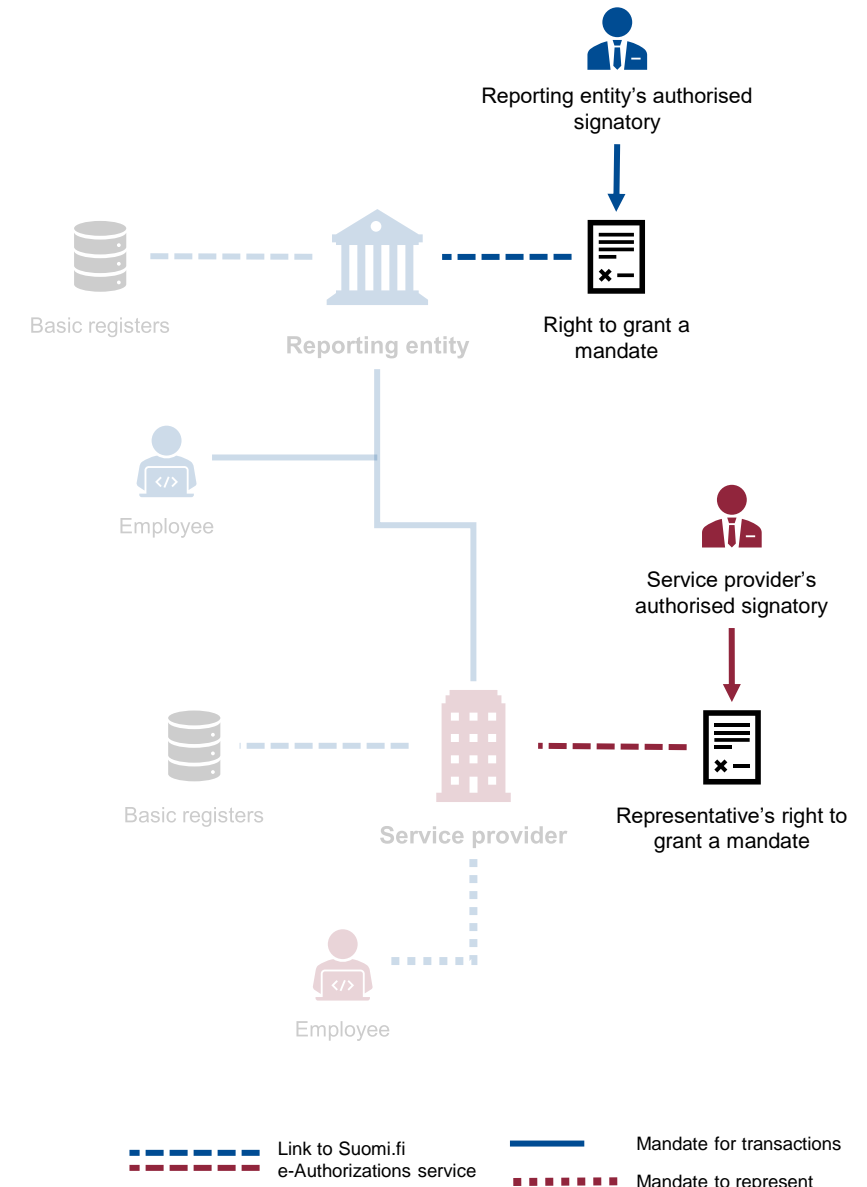
Mandate to represent and Representative's right to grant a mandate

- When the service provider receives from the reporting entity a mandate for transactions, then the service provider cannot assign the mandate within its own organisation as a mandate for transactions
 - The mandate types available to the service provider are 'mandate to represent' and 'representative's right to grant a mandate'
- A mandate to represent resembles a mandate for transactions: using a mandate to represent, an employee of the service provider can act on behalf of the reporting entity in an electronic service
- A representative's right to grant a mandate resembles a right to grant a mandate: a representative's right to grant a mandate may be granted to a person whose task in the organisation is to manage the mandates for transactions received from the reporting entity
 - As with a mandate for transactions, it is not possible with a representative's right to grant a mandate to act on behalf of the reporting entity in an electronic service
 - if a person holding a representative's right to grant a mandate wishes to act in the Reporting Portal, then they must grant to themselves a mandate to represent
 - A person holding a representative's right to grant a mandate may also request mandates for transactions from the reporting entity
 - The reporting entity must accept the mandate request before the mandate enters into effect
 - The service provider is not notified about a rejected mandate request



Mandate provided by an official 1/2

- If a reporting entity or service provider is not entered in any of the basic registers, then an application must be made in the mandate service provided by officials in order to use the Suomi.fi e-Authorizations service
 - Examples of situations where a company must apply for a ‘right to grant a mandate’ via a ‘mandate provided by an official’
 - A company has no representatives entered in the Trade Register
 - A foreign company has no Finnish authorised signatories entered in the Trade Register
 - A foreign company does not have a Finnish business identity code (y-tunnus)
- The type of mandate applied for when making an application for a mandate provided by an official depends on the company’s status in regulatory reporting.
 - Mandate application by reporting entity: right to grant a mandate
 - Mandate application by service provider: representative’s right to grant a mandate:
- **The average processing time for an application is 4-6 weeks**
 - A Finnish company may submit an application for a mandate provided by an official electronically
 - Foreign companies must send the application and attachments by post



Mandate provided by an official 2/2

- Before starting the process of applying for a mandate provided by an official, the organisation should check [here](#), whether it can already act independently in the Suomi.fi e-Authorisations service
 - Consult the list “Who needs authorisation with an application?”.
 - Before applying for a mandate provided by an official, read the instructions where, by completing a short questionnaire, you will receive more detailed instructions on what kind of mandates your organisation should apply for and what attachments should be included in the application.
- In the application, the mandate must be assigned to a person who has either a Finnish personal identity code or a foreign user identifier (UID)
 - If the right to grant a mandate is assigned to a foreign individual, then they must have a UID before completing the application for a mandate provided by an official.
- Before it is submitted, the mandate application must be signed and the requested attachments added



Who needs authorisation with an application?

The following parties authorise with an application:

- Public administration (e.g., municipal or central government or organisation, educational institution, Evangelical Lutheran Church, Orthodox Church)
- A Finnish association whose signature rule states that the association is represented by two or more persons together
- A forest, agricultural or estate partnership whose shareholders include another organisation (e.g. an estate of a deceased person) or whose shareholders do not have an identification token (e.g. online banking codes) or a Finnish personal identity code
- A foreign company in which the persons with signatory rights entered in the Trade Register do not have a Finnish personal identity code or which does not have a business ID
- Private entrepreneurs, self-employed persons, agricultural or forestry operators who cannot use electronic services
- Other organisation for which no representatives have been entered into the Trade Register (e.g. foundation, religious communities, investment fund, unemployment fund, insurance fund, personnel fund, jointly owned forest, road maintenance association, estate partnership or estate of a deceased person, which have a business ID)
- A Finnish company, association or other organisation if the persons entitled to represent it or partners do not have a Finnish personal identity code or identification token (e.g. online banking codes) or if the one with the right to represent is another organisation
- A Finnish company which is bankrupt or in liquidation or which has ceased to operate
- A guardian who has previously used the Katso ID to manage the matters of the person under their guardianship

Others grant and invalidate mandates independently in Suomi.fi e-Authorizations.

> [Suomi.fi e-Authorizations](#)

> [Instructions for users changing over from the Katso service to Suomi.fi e-Authorizations - divv.fi](#)

1. Read the instructions for your application

Always begin drawing up the application by familiarising yourself with the instructions. This is because the requirements vary in different situations and may change between different applications. After you have answered a few questions, you will get instructions and a list of the required documents.

Read the instructions

[General instructions for submitting an application \(PDF\)](#)

Instructions and documents for authorisation with an application

Stages

- 1 Assignor
- 2 Assignor status
- 3 Assignee
- 4 Submitting an application
- 5 Instructions and documents

Stage 1/5

Assignor

Select the assignor. The signatories and documents required for the application are determined on the basis of the assignor.

Assignor

- Finnish company or organisation with a business ID
- Association entered in the Finnish Register of Associations
- Foreign company or organisation with a Finnish business ID
- Foreign company without a Finnish business ID
- Person with a Finnish personal identity code
- Person without a Finnish personal identity code

Abort Next →

Foreign user identifier (UID)

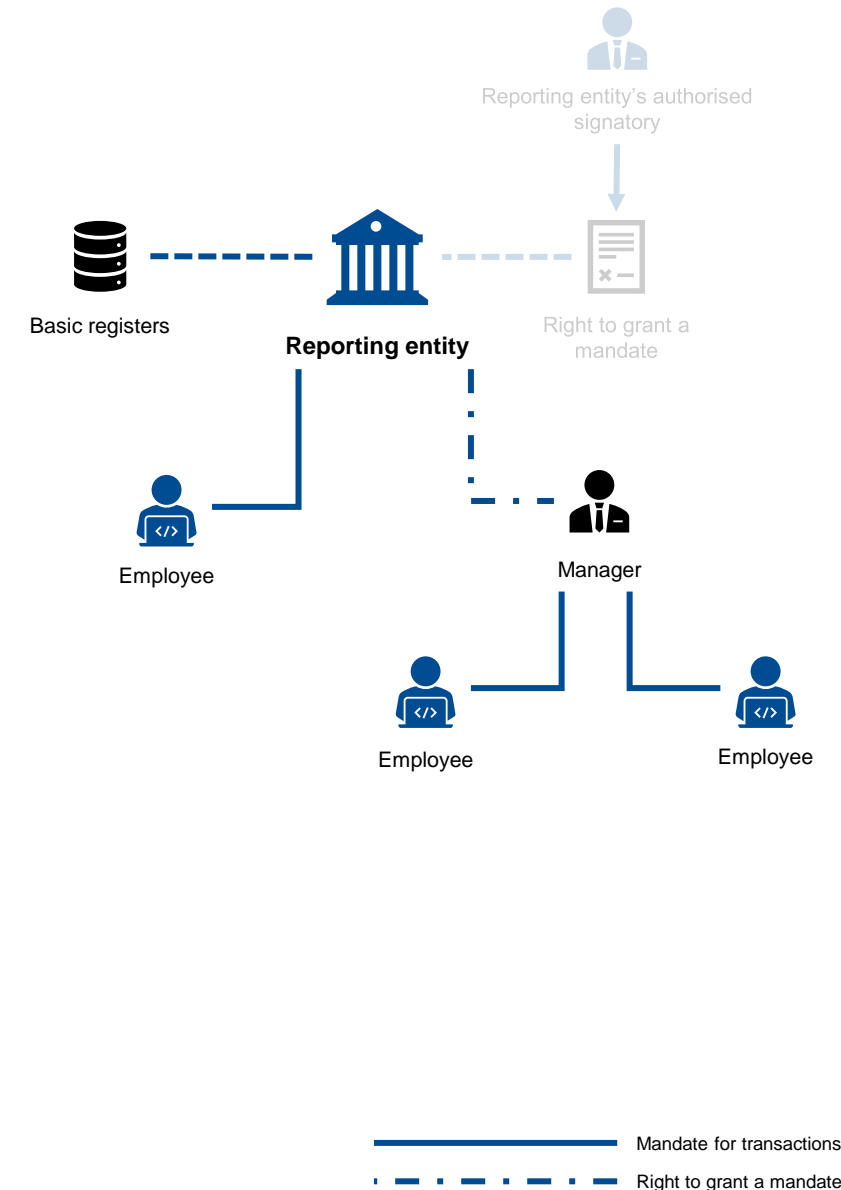
- Authentication of foreign individuals to Suomi.fi strong identification services takes place using a foreign user identifier (UID)
- Concise instructions on registration
 1. Register on the Finnish Authenticator Identification Service [website](#)
 - Enter an email address, read the terms of use, and create a password
 2. Download the Finnish Authenticator application and create a PIN code to log in to the application and e-services
 - Google Play Store (Android), App Store (iOS)
 3. Authenticate your identity in the Finnish Authenticator application
 - To authenticate your identity, you will be required to take pictures of both your passport and yourself
 - If the authentication is successful, then your account will be defined for a level at which you can log in to Finnish public administration services.
- For more detailed instructions on setting up a UID go [here](#)

Examples



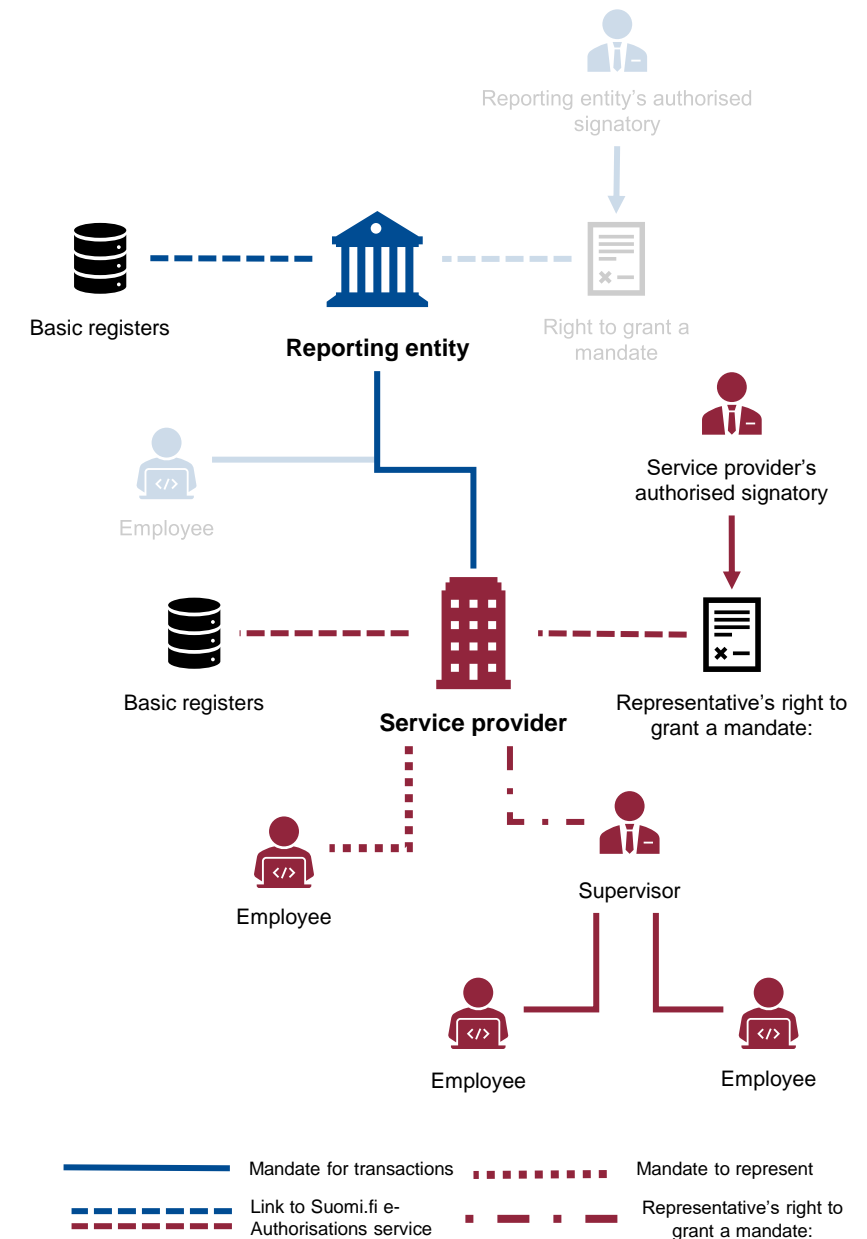
Reporting entity is entered in basic register – handles reporting internally

- When the reporting entity is entered in one of the basic registers, the entity's authorised signatories can assign the entity's mandates in the Suomi.fi e-Authorisations service
- An authorised signatory can assign mandates for regulatory reporting within the organisation as follows:
 1. Authorised signatory grants mandates directly to the employee responsible for regulatory reporting (mandate for transactions)
 2. Authorised signatory grants mandates to a manager (right to grant a mandate)
 - Upon receiving the right to grant a mandate, the manager can assign additional mandates (mandates for transactions) to other employees and to themselves



Reporting entity is entered in basic register – handles reporting via service provider

- When the reporting entity is entered in one of the basic registers, then persons with the right to represent the entity can assign mandates for the FIN-FSA's Reporter Portal.
- In order for mandates to be granted to a service provider, the service provider must also be able to transact in the Suomi.fi e-Authorizations service
 - The service provider is entered in a basic register: service provider is able to receive mandates in the Suomi.fi e-Authorizations service
 - The service provider is not entered in a basic register or has no Finnish authorised signatory entered in a register: the service provider applies, via a mandate provided by an official, for a representative's right to grant a mandate
- The service provider assigns additional mandates, in the form of mandates to represent or representative's right to grant a mandate



Foreign reporting entity that does not have Finnish authorised signatories

- If the reporting entity is not entered in any of the basic registers, it must apply for a right to manage its mandates via an application to the mandate service granted by officials
- Via the mandate application, the mandate must be assigned to a person who has either a Finnish personal identity code or a foreign user identifier (UID)
 - When the person receiving the mandate does not have a Finnish personal identity code, the person must create the UID before completing the mandate application to the mandate service granted by officials (see instructions on slide 13)
 - If the entity wishes to assign mandates later to other individuals that do not have a Finnish personal identity code, then they must also create UIDs
 - These can be created later when the reporting entity has already received, via a mandate application to the mandate service granted by officials, the right to manage its mandates in the Suomi.fi e-Authorisations service
- The same principles also apply to service providers. The only difference is the mandates to be applied for via an application to the mandate service granted by officials (see slide 11):
 - Reporting entity: right to grant a mandate
 - Service provider: representative's right to grant a mandate

