

e-Authorisation – Notification of short positions – Position holder without 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 managed in-house**.

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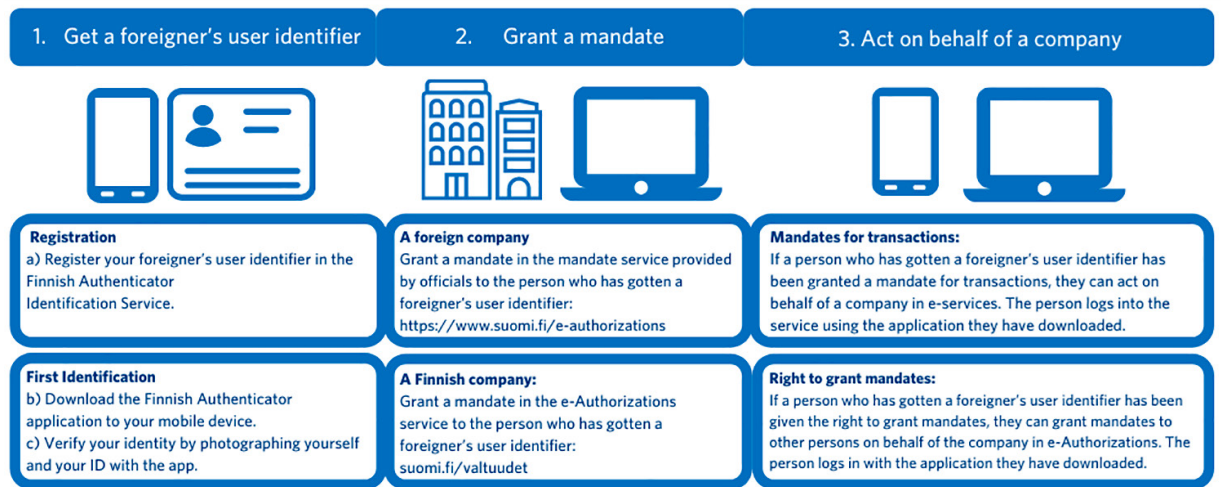
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1 Introduction

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 [Finnish Authenticator Identification Service](#).
- The foreign company (*position holder*) 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.
- After the foreign company (*position holder*) has applied for the **right to grant a mandate** for its representative (*employee*) through the authorisation with an application service and the application has been processed successfully, the representative can grant **mandates for transactions** in [Suomi.fi e-Authorisations service](#) to the persons responsible for carrying out the daily reporting process.
- The employee who has been granted a **mandate for transactions** can log in the [FIN-FSA's electronic services platform](#) and 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. The first two – a mandate for transactions and a right to grant a mandate – are used in this case.

- 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.

25 September 2024

- 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** before 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** as early in the process as possible.

In the [Finnish Authenticator Identification Service](#), 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.

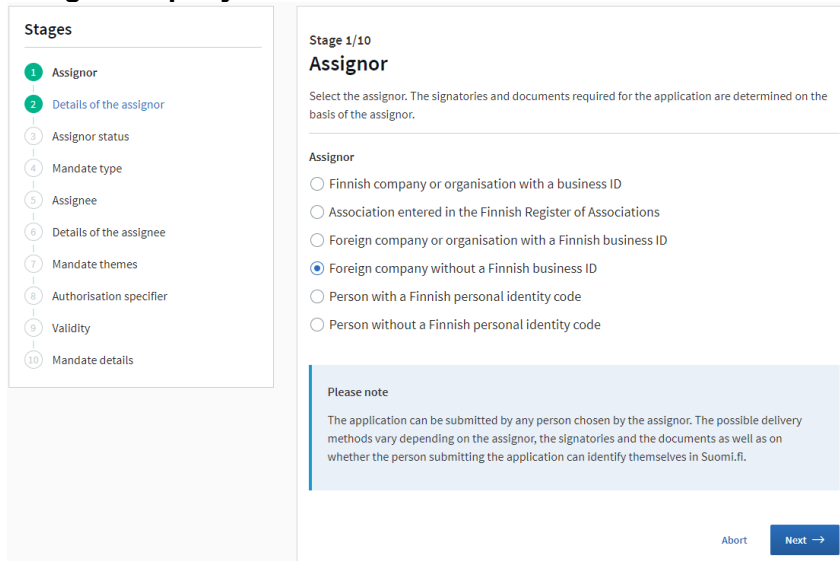
Detailed instructions and FAQ: [Finnish Authenticator Identification Service - Suomi.fi](#)

4 Authorisation with an application

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

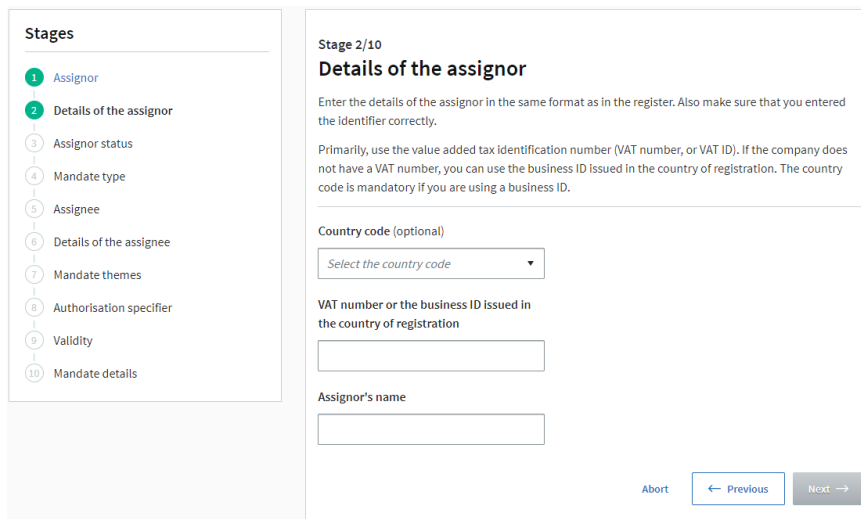
In the first stage of the application, you will select the type of the assignor. Select **Foreign company without a Finnish business ID**.



The screenshot shows the 'Assignor' selection screen. On the left, a 'Stages' sidebar lists 10 steps, with 'Assignor' (Step 1) highlighted in green. The main content area is titled 'Stage 1/10 Assignor' and includes instructions: 'Select the assignor. The signatories and documents required for the application are determined on the basis of the assignor.' Below this, there are radio button options for different assignor types. The option 'Foreign company without a Finnish business ID' is selected. A 'Please note' box contains information about submission requirements. At the bottom right, there are 'Abort' and 'Next' buttons.

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.



The screenshot shows the 'Details of the assignor' form. The 'Stages' sidebar on the left highlights 'Details of the assignor' (Step 2) in green. The main content area is titled 'Stage 2/10 Details of the assignor' and includes instructions: 'Enter the details of the assignor in the same format as in the register. Also make sure that you entered the identifier correctly.' Below this, there are three input fields: a dropdown menu for 'Country code (optional)', a text box for 'VAT number or the business ID issued in the country of registration', and a text box for 'Assignor's name'. At the bottom right, there are 'Abort', 'Previous', and 'Next' buttons.

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.

Stages

- 1 Assignor
- 2 Details of the assignor
- 3 Assignor status
- 4 **Mandate type**
- 5 Assignee
- 6 Details of the assignee
- 7 Mandate themes
- 8 Authorisation specifier
- 9 Validity
- 10 Mandate details

Stage 3/10

Assignor status and signatories

The application is signed by persons who have the right to represent the assignor on a legislative, articles of organisation rules-related, or status-related basis. If the signatory is a company or other organisation, the application is signed by those who are entitled to represent that company or organisation.

Next, select all the information that applies to the signatories. At least one entry is required for each field.

Who will sign the application?

The signatory is a person who is entitled to represent the assignor

The signatory is a company, association or other organisation entitled to represent the assignor

[Abort](#)
[< Previous](#)
[Next >](#)

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**.

Stages

- 1 Assignor
- 2 Details of the assignor
- 3 Assignor status
- 4 **Mandate type**
- 5 Assignee
- 6 Details of the assignee
- 7 Mandate themes
- 8 Authorisation specifier
- 9 Validity
- 10 Mandate details

Stage 4/10

Mandate type

When the mandate type you select is the right to grant a mandate or the representative's right to grant a mandate, the assignee may in future administer the mandates independently in Suomi.fi e-Authorizations.

If it is not possible to authorise anyone who could use Suomi.fi e-Authorizations, select mandate for transactions as the mandate type.

Mandate type

Right to grant a mandate
Select this when you want to grant a person a right to grant and invalidate mandates for transactions in Suomi.fi e-Authorizations. Note that the person with a right to grant a mandate must also grant a mandate for transactions to themselves, if they need to act on behalf of the assignor.

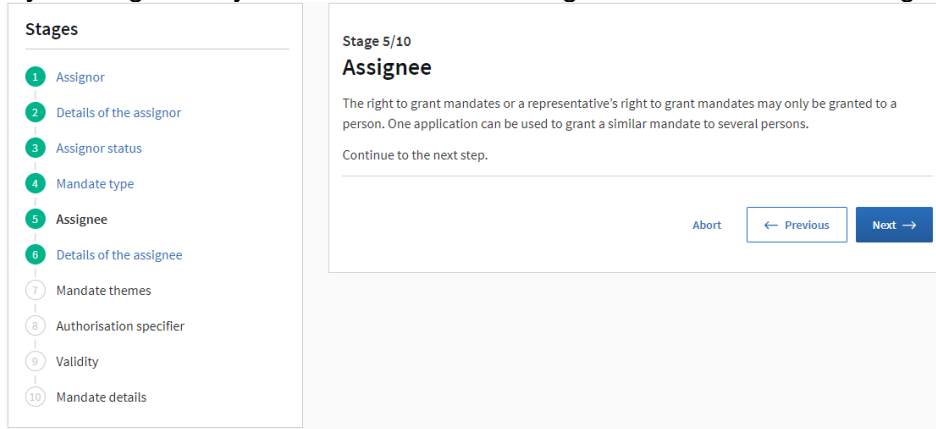
Representative's right to grant a mandate
Select this when you want to grant a person a right to grant and invalidate mandates to represent and request mandates for transactions in Suomi.fi e-Authorizations. Note that the person with a representative's right to grant a mandate must also grant a mandate to represent to themselves if they need to act on behalf of the customer.

Mandate for transactions
Select this when you want to grant a person or an organisation a right to carry out transactions on behalf of the assignor. For example, a company authorises an individual employee or an accounting firm to manage the company's tax affairs.

[Abort](#)
[< Previous](#)
[Next >](#)

Stage 5: Assignee

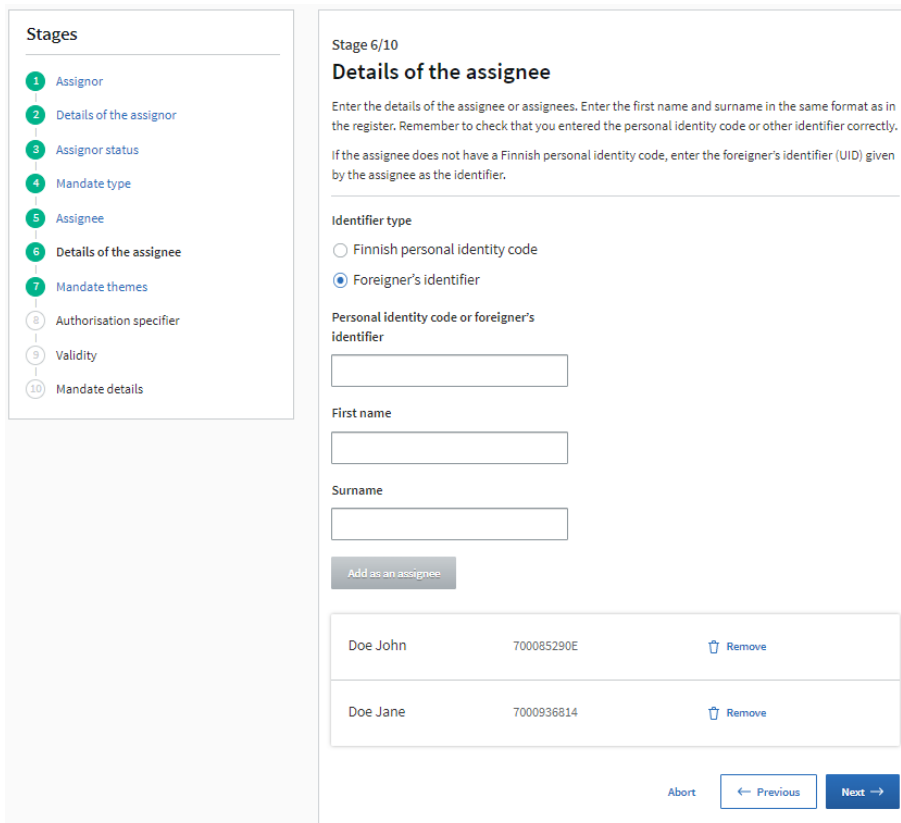
By clicking **Next**, you can move forward to give the details of the assignee.



The screenshot shows a sidebar on the left titled "Stages" with a vertical list of 10 steps: 1 Assignor, 2 Details of the assignor, 3 Assignor status, 4 Mandate type, 5 Assignee, 6 Details of the assignee, 7 Mandate themes, 8 Authorisation specifier, 9 Validity, and 10 Mandate details. Step 5 is highlighted in green. The main content area is titled "Stage 5/10 Assignee" and contains the text: "The right to grant mandates or a representative's right to grant mandates may only be granted to a person. One application can be used to grant a similar mandate to several persons. Continue to the next step." At the bottom right, there are three buttons: "Abort", "← Previous", and "Next →".

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.



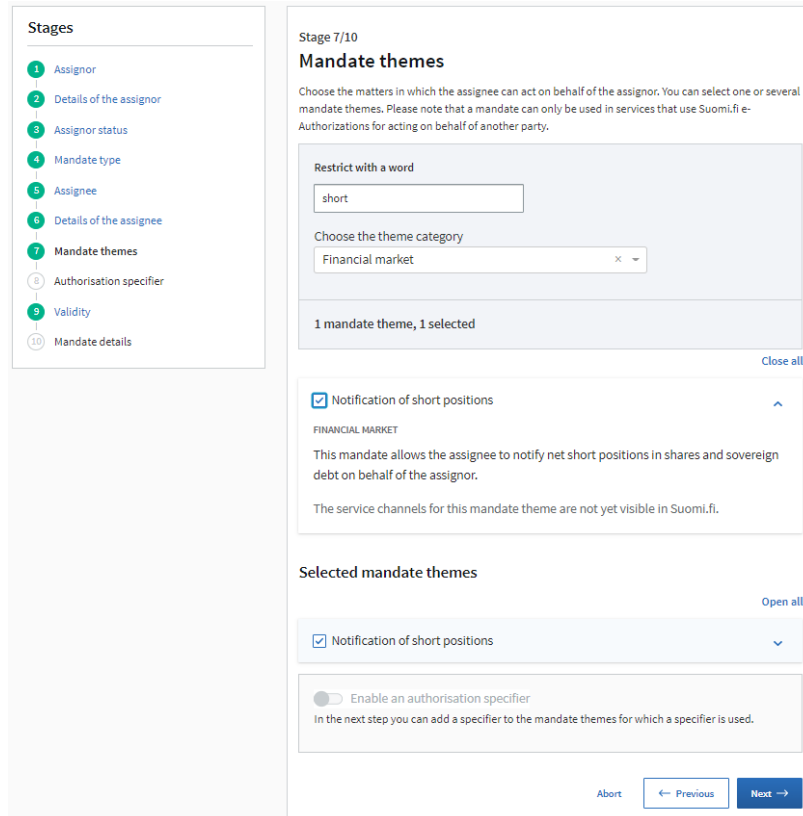
The screenshot shows the same sidebar as in Stage 5, but now step 6 "Details of the assignee" is highlighted in green. The main content area is titled "Stage 6/10 Details of the assignee" and contains the text: "Enter the details of the assignee or assignees. Enter the first name and surname in the same format as in the register. Remember to check that you entered the personal identity code or other identifier correctly. If the assignee does not have a Finnish personal identity code, enter the foreigner's identifier (UID) given by the assignee as the identifier." Below this text, there are two radio buttons for "Identifier type": "Finnish personal identity code" (unselected) and "Foreigner's identifier" (selected). Underneath is a text input field labeled "Personal identity code or foreigner's identifier". Below that are two more text input fields labeled "First name" and "Surname". A grey button labeled "Add as an assignee" is positioned below the input fields. At the bottom, there is a table listing two added assignees:

Doe John	700085290E	Remove
Doe Jane	7000936814	Remove

At the bottom right, there are three buttons: "Abort", "← Previous", and "Next →".

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.

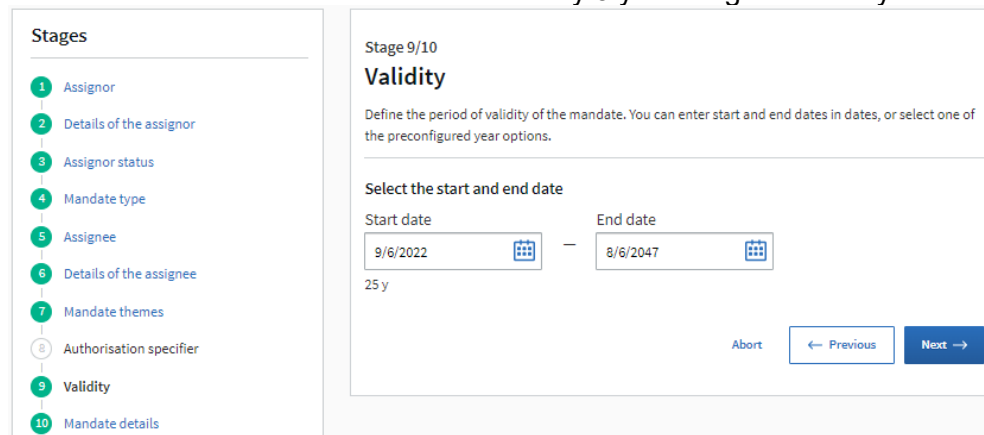


The screenshot shows the 'Mandate themes' interface for Stage 7/10. On the left, a 'Stages' sidebar lists 10 steps, with 'Mandate themes' (step 7) highlighted. The main content area is titled 'Mandate themes' and includes the following elements:

- Restrict with a word:** A text input field containing 'short'.
- Choose the theme category:** A dropdown menu with 'Financial market' selected.
- Summary:** '1 mandate theme, 1 selected' with a 'Close all' link.
- Selected theme details:** A card for 'Notification of short positions' (FINANCIAL MARKET) with a description: 'This mandate allows the assignee to notify net short positions in shares and sovereign debt on behalf of the assignor. The service channels for this mandate theme are not yet visible in Suomi.fi.'
- Selected mandate themes:** A list with 'Notification of short positions' checked, and an 'Open all' link.
- Enable an authorisation specifier:** A toggle switch (currently off) with the text: 'In the next step you can add a specifier to the mandate themes for which a specifier is used.'
- Navigation:** 'Abort', 'Previous', and 'Next' buttons.

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.

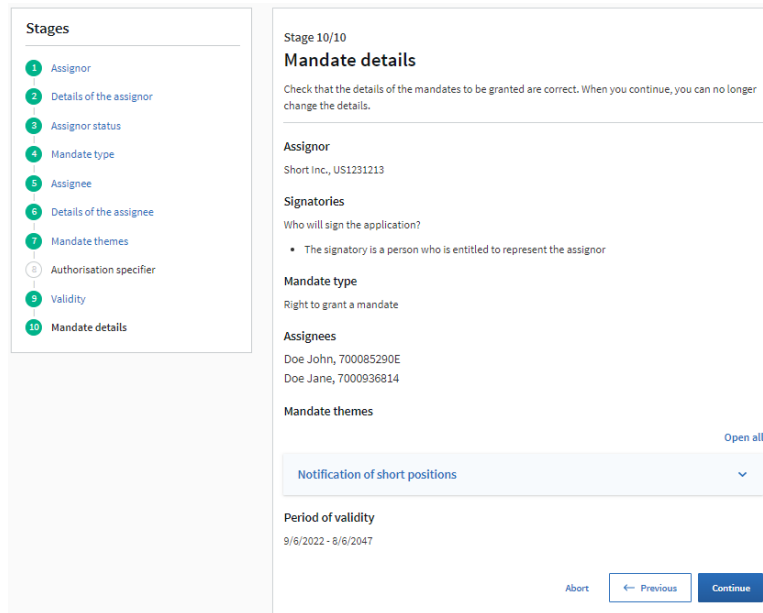


The screenshot shows the 'Validity' interface for Stage 9/10. On the left, a 'Stages' sidebar lists 10 steps, with 'Validity' (step 9) highlighted. The main content area is titled 'Validity' and includes the following elements:

- Instruction:** 'Define the period of validity of the mandate. You can enter start and end dates in dates, or select one of the preconfigured year options.'
- Select the start and end date:** Two date input fields. The first is 'Start date' with '9/6/2022' and a calendar icon. The second is 'End date' with '8/6/2047' and a calendar icon.
- Duration:** '25 y' is displayed below the date fields.
- Navigation:** 'Abort', 'Previous', and 'Next' buttons.

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 a signatory

You can add persons who will approve using strong identification only when you have identified yourself in Suomi.fi.

Select the signing method

An application can be approved using strong identification only if the person approving has a Finnish personal identity code and uses Finnish online banking codes, a certificate card or a mobile certificate. Others sign the application by hand.

Approval with strong identification

Signing by hand

Select which identification document the signatory will need to prove their identity

A valid Finnish passport or an ID card issued by the police

A valid foreign passport or an official ID card of a member state of the European Economic Area, San Marino or Switzerland

An expired Finnish passport or ID card issued by the police

An expired foreign passport or official ID card of a member state of the European Economic Area, San Marino or Switzerland

Date of birth

Name

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**:

Locking signatories
Do not lock the signatories until you have added all the required persons. After locking, you can still change the signing method. If you unlock and change signatories, all of them must sign or approve the application again.

Lock the signatories

2. Submitting an application

Submitting an application
You cannot submit the application electronically because you need to enclose documents that cannot be submitted electronically.

Select the method of submitting the application

I will send my application electronically

I will send the application by post

I will bring the application to a service location

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

3. Contact information

Contact information
Enter the contact information that can be used to reach the applicant in case of any issues and where information about the processed application can be sent.

Method of contacting

Email

Post

Email address

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

4. Instructions

Instructions

- If the assignee does not have a Finnish personal identity code, the mandate may be granted for a maximum of three years. The period of validity is calculated from the date of commencement specified on the application. If the period of validity indicated in the application is longer, it will be changed at the registration stage.
- Print the application for signing (PDF).
- An application signed by hand and the required appendices must be submitted for processing within 6 months of printing out the application. Applications submitted later than this shall be rejected.
- Take a copy of the application for yourself before submitting the application for processing.
- Make sure that you submit all the required documents for processing.
- The documents proving the authority to sign may not be more than 6 months old.
- Foreign documents that prove the authority to sign are accepted only if they have been certified and they are in Finnish, Swedish or English. Documents in any other language must be translated by an official translator. You will find more information in the Digital and Population Data Services Agency's instructions [Mandate service provided by officials: Notarisation of foreign documents](#)
- Copies of foreign identity documents are accepted only if they have been certified. You will find more information in the Digital and Population Data Services Agency's instructions [Mandate service provided by officials: Notarisation of foreign documents](#)
- If you forgot to attach a document to the application or notice an error after having submitted the application for processing, wait until you receive a request for additional information and instructions for completing the application.
- You will be notified when the mandate has been registered. If you have not completed the application according to the instructions, the processing time will be longer. If you do not provide the requested additional information by the deadline, the mandate cannot be registered, and the application will be rejected.
- When the right to grant a mandate has been registered, the assignee can grant mandates for transactions in the selected mandate themes in Suomi.fi e-Authorizations. The right to grant a mandate does not allow the assignee to use the services. The assignee must first also grant a mandate for transactions to themselves, if they need to act on behalf of a company or an organisation. Ask the assignee to read the instructions in Suomi.fi: Grant a mandate as a company or an organisation.

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 Suomi.fi e-Authorisations

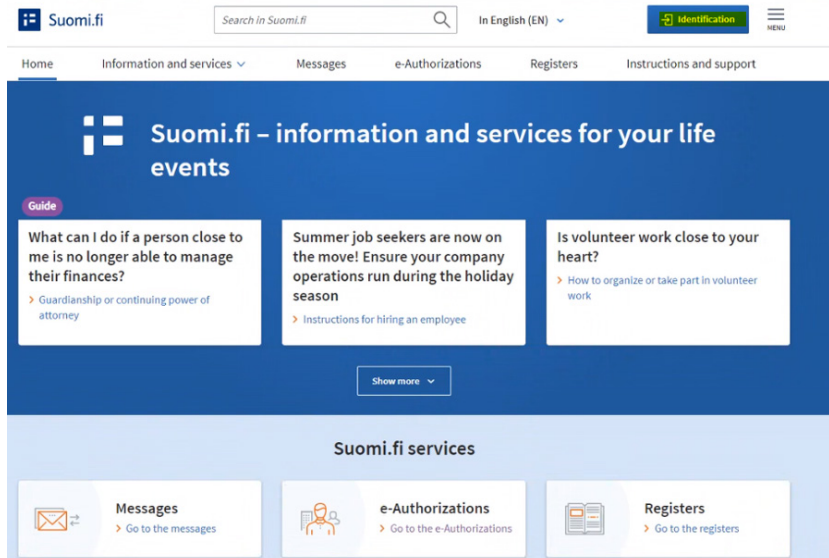
After the application referred to in the previous stage is successfully processed (i.e. a confirmation has been received from Digital and Population Data Services Agency), the assignees of the position holder are able **to grant mandates for transactions** in the Suomi.fi e-Authorisations service to the persons responsible for carrying out the daily reporting process. Please note that the persons who will be granted the mandate for transactions must have acquired the foreigner's user identifier (UID) beforehand (see page 2 for instructions).

If the assignees themselves need to act on behalf of the assignor, they must grant themselves a mandate for transactions. The right to grant a mandate does not allow the assignee to use the services.

More information is available on Suomi.fi website: [Grant a mandate as a company or an organisation - Suomi.fi](#) and below you will find a step-by-step guide.

5.1 To grant mandates for transaction to persons responsible for carrying out the daily reporting process

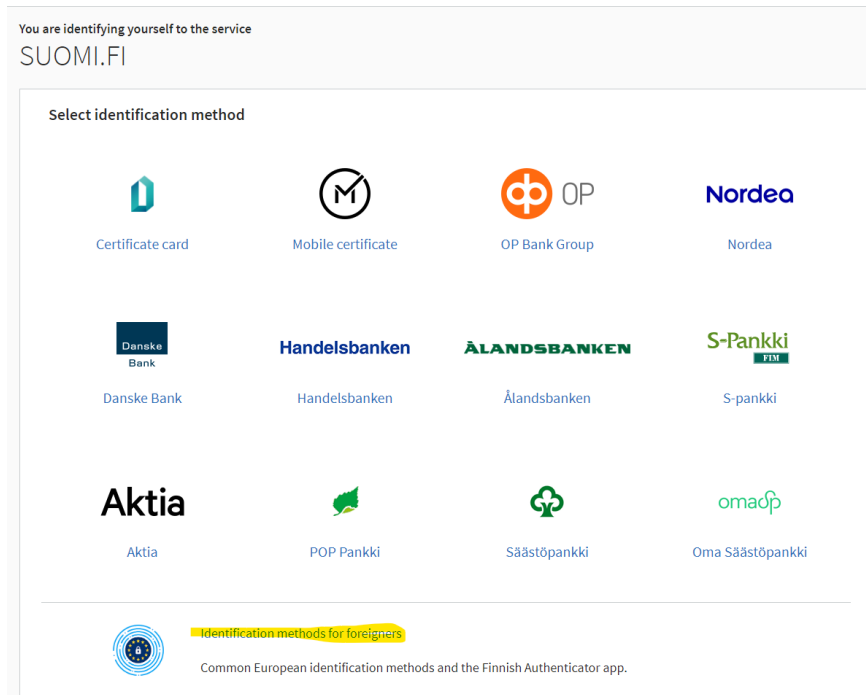
The assignee logs in to the Suomi.fi portal (<https://suomi.fi>) with the previously created foreigner's user identifier (UID). To log in, click on the **Identification** button at the top right of the site.



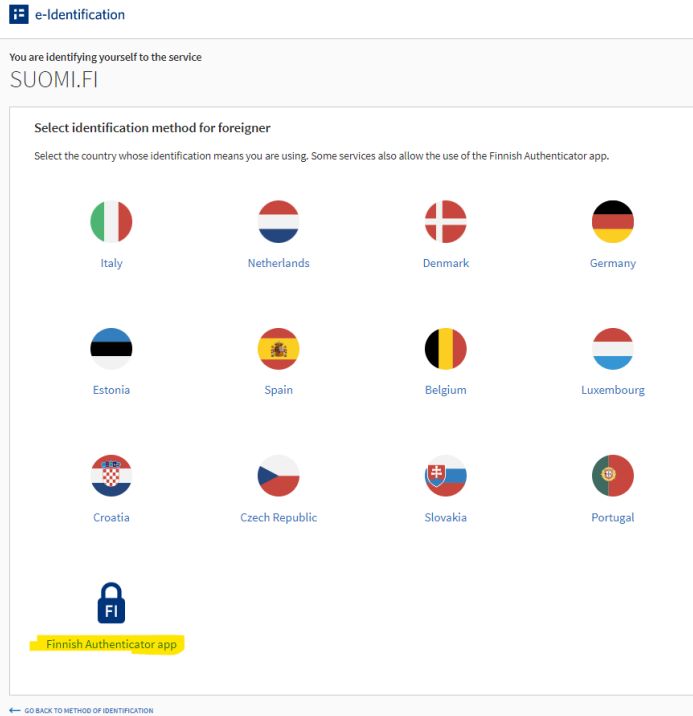
 e-Identification

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

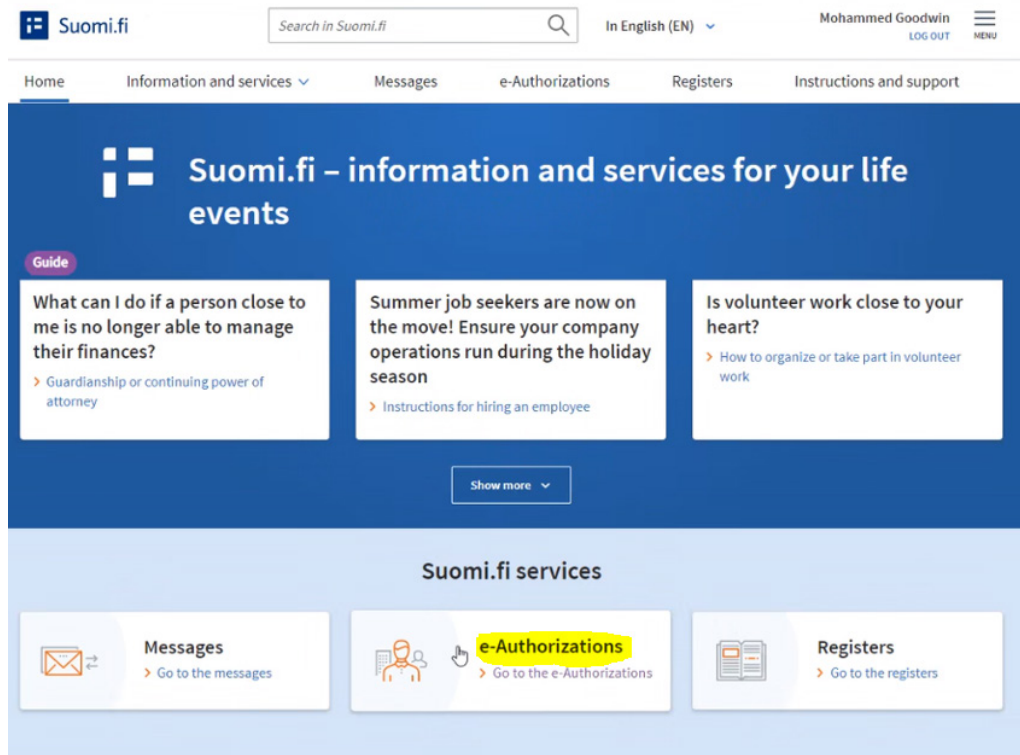
 e-Identification



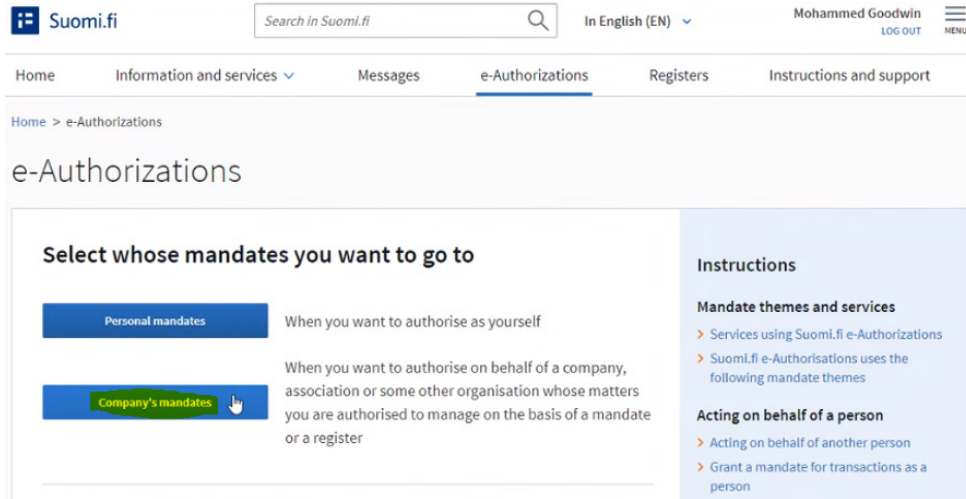
When selecting the identification method for foreigners, always choose the option **Finnish Authenticator App** even if your country's identification means are available.



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

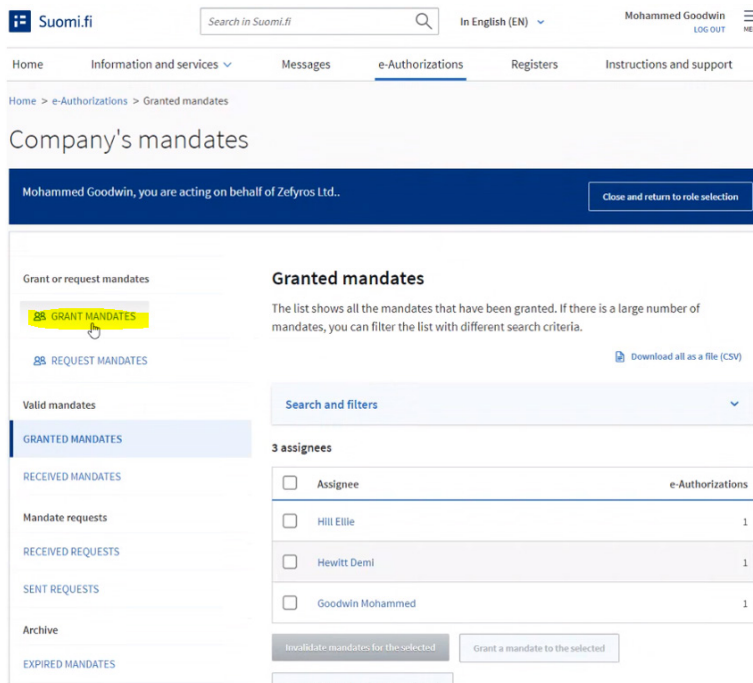


On the e-Authorisations page, select **Company's mandates**.



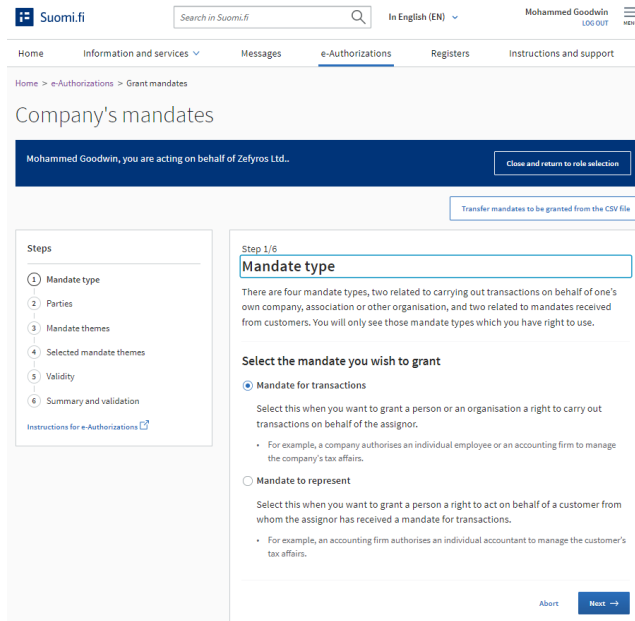
Select the company you want to act on behalf of and continue to the e-service.

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

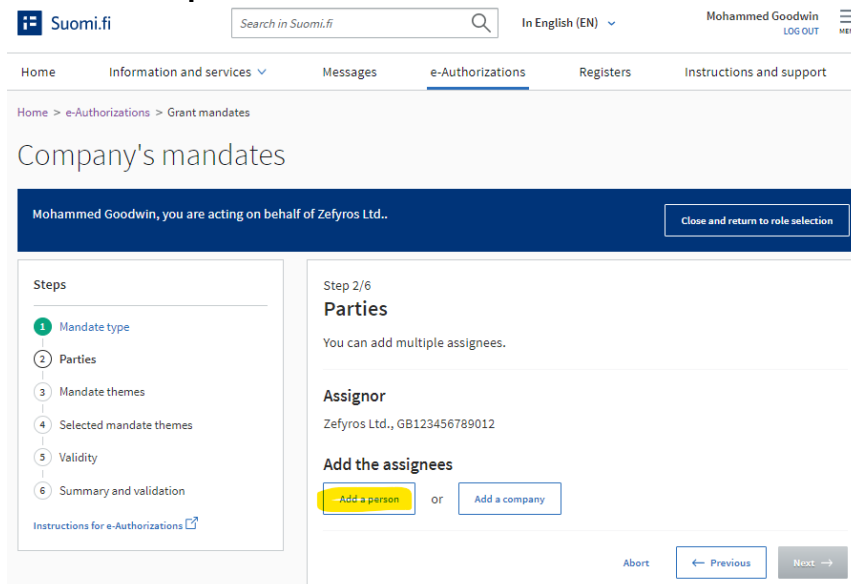
In the first step you can select the mandate type you wish to grant. Select the option **Mandate for transactions**.



The screenshot shows the 'Company's mandates' page in the Suomi.fi system. The user is logged in as Mohammed Goodwin, acting on behalf of Zefyros Ltd. The page title is 'Company's mandates'. A navigation bar includes 'Home', 'Information and services', 'Messages', 'e-Authorizations', 'Registers', and 'Instructions and support'. The main content area shows a progress indicator for 'Step 1/6: Mandate type'. The text explains that there are four mandate types, two related to carrying out transactions on behalf of one's own company, association or other organisation, and two related to mandates received from customers. The user is prompted to 'Select the mandate you wish to grant'. Two options are available: 'Mandate for transactions' (selected) and 'Mandate to represent'. The 'Mandate for transactions' option includes a description and an example: 'For example, a company authorises an individual employee or an accounting firm to manage the company's tax affairs.' The 'Mandate to represent' option includes a description and an example: 'For example, an accounting firm authorises an individual accountant to manage the customer's tax affairs.' At the bottom, there are 'Abort' and 'Next' buttons.

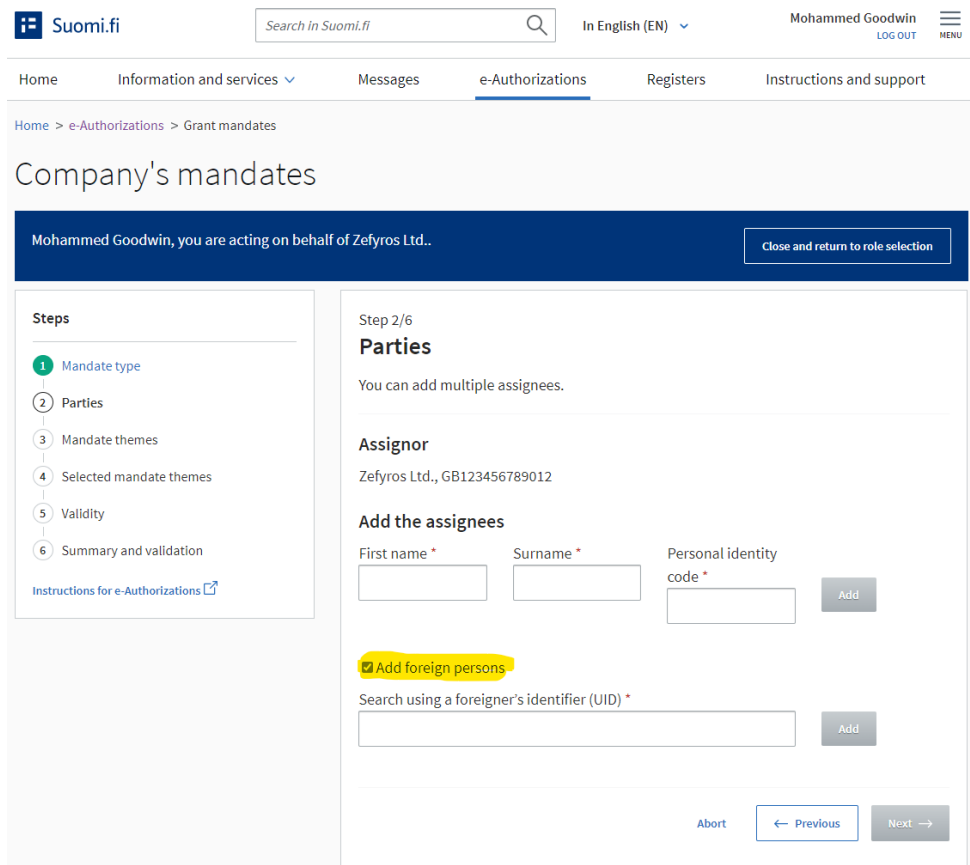
Step 2: Parties

In the second step you will determine the persons who will be granted the mandate. Select **Add a person**.



The screenshot shows the 'Company's mandates' page in the Suomi.fi system, now at 'Step 2/6: Parties'. The user is still logged in as Mohammed Goodwin, acting on behalf of Zefyros Ltd. The page title is 'Company's mandates'. The progress indicator shows 'Step 2/6: Parties'. The text states 'You can add multiple assignees.' Below this, the 'Assignor' is listed as 'Zefyros Ltd., GB123456789012'. The user is prompted to 'Add the assignees'. Two buttons are available: 'Add a person' (highlighted in yellow) and 'Add a company'. At the bottom, there are 'Abort', 'Previous', and 'Next' buttons.

Select **Add foreign persons**, enter the previously acquired UID and click **Add**. You can add multiple employees, if necessary.



Suomi.fi Search in Suomi.fi In English (EN) Mohammed Goodwin LOG OUT MENU

Home Information and services Messages e-Authorizations Registers Instructions and support

Home > e-Authorizations > Grant mandates

Company's mandates

Mohammed Goodwin, you are acting on behalf of Zefyros Ltd.. [Close and return to role selection](#)

Steps

- 1 Mandate type
- 2 **Parties**
- 3 Mandate themes
- 4 Selected mandate themes
- 5 Validity
- 6 Summary and validation

[Instructions for e-Authorizations](#)

Step 2/6

Parties

You can add multiple assignees.

Assignor
Zefyros Ltd., GB123456789012

Add the assignees

First name * Surname * Personal identity code *

Add foreign persons

Search using a foreigner's identifier (UID) *

Abort

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.

Suomi.fi In English (EN) Mohammed Goodwin LOG OUT MENU

Home Information and services Messages e-Authorizations Registers Instructions and support

Home > e-Authorizations > Grant mandates

Company's mandates

Mohammed Goodwin, you are acting on behalf of Zefyros Ltd.. [Close and return to role selection](#)

Steps

- 1 Mandate type
- 2 Parties
- 3 **Mandate themes**
- 4 Selected mandate themes
- 5 Validity
- 6 Summary and validation

[Instructions for e-Authorizations](#)

Step 3/6

Mandate themes

Search for and select the mandate themes for which you will grant the right to act on behalf of the assignor. You can also use the name of the e-service or the organisation as the search word. You can extend the search by using several search words when you add them separately. The list shows all mandate themes that include one of the search terms.

Show all mandate themes

Search for mandate themes

For example, use of pharmacy services, MyTax, Kela or salary

Mandate themes (1)

Search words used

short (1)

Select all 1 Close all ^

Notification of short positions ^

FINANCIAL MARKET

This mandate allows the assignee to notify net short positions in shares and sovereign debt on behalf of the assignor.

Selected mandate themes (1)

In the next step, you can see the mandate themes that you have selected.

Step 4: Selected mandate themes

Suomi.fi In English (EN) Mohammed Goodwin LOG OUT MENU

Home Information and services Messages e-Authorizations Registers Instructions and support

Home > e-Authorizations > Grant mandates

Company's mandates

Mohammed Goodwin, you are acting on behalf of Zefyros Ltd.. [Close and return to role selection](#)

Steps

- 1 Mandate type
- 2 Parties
- 3 Mandate themes
- 4 **Selected mandate themes**
- 5 Validity
- 6 Summary and validation

[Instructions for e-Authorizations](#)

Step 4/6

Selected mandate themes

The list shows the mandate themes that you have selected. You can delete mandate themes or make additional selections by returning to the previous step.

Mandate themes (1) Delete all

FINANCIAL MARKET

This mandate allows the assignee to notify net short positions in shares and sovereign debt on behalf of the assignor.

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.

Assignee	e-Authorizations
<input type="checkbox"/> Chambers Laura	1
<input type="checkbox"/> Hill Ellie	4
<input type="checkbox"/> Goodwin Mohammed	4
<input type="checkbox"/> Perry Katherine	2
<input type="checkbox"/> Zettertes Väinö	1
<input type="checkbox"/> Brigi Ltd 04657846574657	1
<input type="checkbox"/> Hewitt Demi	1

6 Contact details

Digital and Population Data Services Agency

[Customer service for organisations](#) helps companies and organisations in the use of Suomi.fi services.

- Email: organisaatiopalvelut@dvv.fi
- 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

7 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 \(finanssivalvonta.fi\)](#)