FIN-FSA
FINANCIAL SUPERVISORY AUTHORITY

Memorandum

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Suomi.fi instructions for non-EEA AIFMD reporters

1 Introduction

The aim of this document is to provide guidance on DVV's (Finnish Digital and Population Data Services Agency) Suomi.fi system to reporting obligated non-EEA AIFMD entities who need to access FIN-FSA's New Reporting System. The document focuses on entities submitting reports without a service provider and covers how reporting obligated entities apply for the correct type of mandates in the Suomi.fi service.

To summarize the instructions in chapters 2 the following mandates are required from the reporting obligated entity for the Suomi.fi authorization to work:

- The reporting obligated entity needs to assign an employee with a mandate with type Right to grant a mandate
- The assigned employee needs to assign themselves and/or other employees mandate with type Mandate for transactions on behalf of the entity

During the application process the reporting obligated entity applies for a mandate with type Right to grant a mandate. The assignee will be some employee from the entity who will be later responsible for administering the entity's mandates. Once the application is approved by DVV, the assigned employee will be able to give mandates of the Mandate for transactions directly in the Suomi.fi e-Authorizations service: https://www.suomi.fi/e-authorizations.

Once an individual has a mandate with type Mandate for transactions on behalf of the reporting obligated entity, said individual will be able to access FIN-FSA's reporting portals on behalf of the entity. The same mandates are valid for both the Reporter portal as well as the portal test environment Validation service.

We recommend familiarizing oneself with the basic concepts of Suomi.fi service before starting the application process. For general information on the Suomi.fi system as well as FIN-FSA's specific requirements you can learn more from the links below:

- Suomi.fi e-Authorizations for organisations: https://www.suomi.fi/instructions-and-support/e-authorizations/acting-on-behalf-of-an-organisation
- Glossary of e-Authorizations: https://www.suomi.fi/instructions-and-support/e-authorizations/what-is-suomifi-e-authorizations/glossary-of-e-authorizations
- FIN-FSA's general instructions on Suomi.fi: https://www.finanssivalvonta.fi/en/reporting/reporting-of-financial-standing-and-risks/new-reporting-system/reporting-instructions/suomi.fi-authorisation-and-identification/

- Suomi.fi authentication and authorization (Non-EEA reporters): https://www.finanssivalvonta.fi/en/reporting/reporting-of-financial-standing-and-risks/new-reporting-system/aifmd-reporting/more-detailed-instructions-on-aifmd-reporting/

For further guidance, you can contact FIN-FSA's New Reporting System Helpdesk: NewReportingSystem@fiva.fi

2 Application process for the reporting obligated entity

For an entity to act in the FIN-FSA's reporting portals it needs to be registered in the Suomi.fi system. The registration is achieved by applying for mandates on behalf of the entity.

Individuals from the reporting obligated entity need to have mandates on behalf of the entity for them to be able to access the portal on behalf of the entity. During the initial mandate application process at least one individual from the entity is assigned a mandate with type Right to grant a mandate. Once the initial mandate application has been approved by the DVV, the individual with the Right to grant a mandate will be able to assign mandates with type Mandate for transactions to oneself as well as other individuals working for the entity. With the Mandate for transactions, individuals will be able to access the FIN-FSA's New Reporting System on behalf of reporting obligated entity.

2.1 Application process

First, the individual who will be assigned mandates on behalf of the reporting obligated entity needs to register for a UID. The UID is an identifier for foreign individuals in the Suomi.fi system.

- To register for a UID, visit Finnish Authenticator Identification Service page: https://idm.finnauth.tunnistaminen.suomi.fi/self-care/#/prod/login
- Select 'Register' to initialize the registration process
- Follow the instructions to complete the registration. The registration process requires installing the Finnish Authenticator application to your phone. In the app, you'll be requested to take a picture of you as well as your passport to authenticate your identity.

After the UID(s) for individual(s) acting on behalf of the entity are registered, the mandate application process can be initialized. In the mandate application, the individuals who have registered for an UID will be given the ability to assign mandates in the Suomi.fi e-Authorizations system on behalf of the reporting obligated entity.

- Enter the Suomi.fi Authorisation with an application service page: https://www.suomi.fi/e-authorizations/authorisation-with-an-application
- Select 'Identify requirements' to get further instructions on the application process and which documents are expected to be attached to the application
  - Stage 1, Assignor: Select 'Foreign company without a Finnish business ID'

- o Stage 2, Assignor status: Here you're asked to provide information on who will be signing the application. Selections during this stage depend on the entity
  - o Stage 3, Assignee: The assignee is one or more of your employees with a UID. The assignee does not have a Finnish personal identity code
  - o Stage 4, Submitting an application: Select 'I will send the application by post' unless you have a contact in Finland who is able to submit the application on behalf of you
  - o Stage 5, Instructions and documents: Please read the instructions provided here carefully in order to know what to take into consideration during the application process and what is expected in terms of documentation attached to the application
- Screenshot or print the instructions for later use
- At the end of the Stage 5 page select 'Continue to the mandate application'. The mandate application includes the following stages
  - o Stage 1, Assignor: Select 'Foreign company without a Finnish business ID'
  - o Stage 2, Assignor status: Here you're asked to provide information on who will be signing the application. Selections during this stage depend on the entity
  - o Stage 3, Details of the assignor
    - Country code: Select the country where you entity is registered to
    - VAT number or the business ID issued in the country of registration: this ID should be some code by which authorities are able to identify the entity from a business registry in the country of registration
    - Assignor name: Your entity's name
  - o Stage 4, Mandate type: Select 'Right to grant a mandate'
  - o Stage 5, Assignee: The assignee is a person
  - o Stage 6, Details of the assignee
    - Identifier type: Foreigner's identifier
    - Personal identity code or foreigner's identifier: The UID(s) of the individual(s) who will be assigned the mandate on behalf of the entity
  - o Stage 7, Mandate theme
    - Mandate theme: Reporting on financial standing and risks
    - Enable an authorisation specifier: Enabled
  - o Stage 8, Authorisation specifier
    - Assignee: The one or more individuals identified during stage 6
    - Data collection identifiers: AIFMD
    - Select Add a specifier and move to the next stage
  - o Stage 9, Validity: A mandate submitted by a foreign entity can be valid up to three years
  - o Stage 10, Mandate details: Check that the following attributes of the mandate are correct
    - Assignor: Your entity
    - Mandate type: Right to grant a mandate
    - Assignees: One or more individuals identified during stage 6
    - Mandate themes: Reporting on financial standing and risks
    - Data collection specifiers: AIFMD
- Follow the instructions to complete the registration process.

After the application has been submitted, the individuals with the UID can follow the status of the application by vising Authorisation with an application page and selecting 'View your applications': https://www.suomi.fi/e-authorizations/authorisation-with-an-application

2.2 Suomi.fi e-Authorizations service

Below is a step-by-step guide on how the individual with mandate type Right to grant a mandate on behalf of the reporting obligated entity assigns mandates with type Mandate for transactions on behalf of the entity. As soon as the mandates are granted, the assigned individual(s) will be able to access the FIN-FSA's Reporting System on behalf of the entity.

- Visit Suomi.fi e-Authorization service: https://www.suomi.fi/e-authorizations
- Log in to the service with your UID credentials
- Once you've accessed the portal, select 'Company's mandates'. You'll be forwarded to a page where you get a list of entities on behalf of which you're able to grant mandates. Select the AIFMD reporting obligated entity and continue to the next page
- On company's mandates page, select 'Grant mandate' to start the mandate process
    - Stage 1, Mandate type: Mandate for transactions
    - Stage 2, Parties
        - Add the assignees: Add a person
        - Select option 'Add a foreign person'
        - Add UIDs of the individuals who should have access to the FIN-FSA's reporting portals on behalf of the entity
    - Stage 3, Mandate themes: Reporting on financial standing and risks
    - Stage 4, Selected mandate themes: Enable the authorisation specifier selection
    - Stage 5, Mandate specifier: Add the required mandate specifier
        - Select 'Open all' and 'Add or edit specifiers'
        - Select Add new specifier
        - Assignees: Individual(s) identified at stage 2
        - Data collection identifiers: AIFMD
        - Select 'Save'
    - Stage 6, Validity: A mandate submitted by a foreign entity can be valid up to three years
    - Stage 7, Summary and validation: Check that the following attributes of the mandate are correct
        - Assignor: Your entity
        - Mandate type: Mandate for transactions
        - Assignees: Individual(s) identified at stage 2
        - Mandate themes: Reporting on financial standing and risks
        - Data collection specifiers: AIFMD
- Once the mandate is validated, the assigned individual(s) are able to submit AIFMD reports on behalf of the entity in the FIN-FSA's reporting portals.