



## Suomi.fi instructions for service providers of 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 service providers of non-EEA AIFMD reporters who need to access FIN-FSA's New Reporting System on behalf of their clients. The document covers how both the service provider as well as the client entities can apply for the correct type of mandates in the Suomi.fi service.

To summarize the instructions in chapters 2 and 3, the following mandates are required from both parties for the Suomi.fi authorization to work:

- The service provider needs to receive Mandate for transactions from the client entity
- The employee of the service provider needs a Mandate to represent on behalf of the service provider

During the application process the the client entity applies for a mandate with type Right to grant a mandate and the service provider applies for a Representative's right to grant a mandate. Once individuals from both parties possess these mandates, they are able to give mandates mentioned in the bullet points directly in the Suomi.fi e-Authorizations service: <https://www.suomi.fi/e-authorizations>.

Both the service provider and the client entities can apply for mandates in parallel since the application process only concerns accessing entity's own mandates. Once both the service provider and the client(s) have access to the e-Authorizations service on behalf of their entity, the client(s) can send mandates to the service provider to act on behalf of them in the FIN-FSA's New Reporting System. The same mandates are valid for both the Reporter portal as well as the portal test environment Validation service.

We recommend familiarizing yourself 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/>



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- 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](mailto:NewReportingSystem@fiva.fi)

## 2 Service provider

For an entity to act as a service provider it needs to be registered in the Suomi.fi system. Service provider's clients need to be able to send mandates to the service provider which is possible only once the service provider has presence in the Suomi.fi system. The registration is achieved by applying for mandates on behalf of the service provider.

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

### 2.1 Application process for a service provider

First, the individual who will be assigned mandates on behalf of the service provider 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 was registered for an UID will be given the ability to assign mandates in the Suomi.fi e-Authorizations system on behalf of the entity.

- Enter the Suomi.fi Authorisation with an application service page: <https://www.suomi.fi/e-authorizations/authorisation-with-an-application>

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- 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'
  - 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
  - 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
  - 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 attachments to the application on behalf of you
  - 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
  - Stage 1, Assignor: Select 'Foreign company without a Finnish business ID'
  - 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
  - Stage 3, Details of the assignor
    - Country code: Select the country where the service provider 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: Service provider entity's name
  - Stage 4, Mandate type: Select 'Representative's right to grant a mandate'
  - Stage 5, Assignee: The assignee is a person
  - 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 service provider
  - Stage 7, Mandate theme
    - Mandate theme: Reporting on financial standing and risks
    - Enable an authorisation specifier: Enabled
  - 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
  - Stage 9, Validity: A mandate submitted by a foreign entity can be valid up to three years
  - Stage 10, Mandate details: Check that the following attributes of the mandate are correct
    - Assignor: The service provider entity
    - Mandate type: Representative's right to grant a mandate
    - Assignees: The 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 visiting Authorisation with an



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application page and selecting 'View your applications':  
<https://www.suomi.fi/e-authorizations/authorisation-with-an-application>

## 2.2 Suomi.fi e-Authorizations service for service providers

After the application has been approved by the DVV, the individual with the mandate on behalf of the service provider is able to access and manage the mandates of the service provider entity. For the individual to access the FIN-FSA's New Reporting System on behalf of their clients, the individual needs to assign Mandate to represent to oneself.

- 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 to represent
  - Stage 2, Parties
    - Add the assignees: Add a person
    - Select 'Add foreign persons' and enter your UID
  - 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: Your service provider
    - 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: The service provider entity
    - Mandate type: Mandate to represent
    - Assignees: You as an individual
    - Mandate themes: Reporting on financial standing and risks
    - Data collection specifiers: AIFMD
- Once the mandate is validated, the individual will be able to access the FIN-FSA's New Reporting System on behalf of the clients of the service provider.

## 3 Client entities of the service provider

For the client i.e., the AIFMD reporting obligated entity, the application process is almost identical to the service provider: Individual from the client entity needs to register an UID and the client entity needs to apply for a mandate for the individual with the UID. The difference here is that the mandate which is being applied for is of type 'Right to grant a mandate'. This will allow the individual to manage mandates on behalf of the client entity.

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In addition, once the application is approved the individual with the mandate on behalf of the client entity needs to give a Mandate for transactions to the service provider in the Suomi.fi e-Authorizations service. This can be achieved by either the client sending the mandate direct or via approving a request for a mandate from the service provider.

### 3.1 Application process as a client entity

First, the individual who will be assigned mandates on behalf of the service provider 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 client 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'
  - 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
  - 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
  - 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
  - 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
  - Stage 1, Assignor: Select 'Foreign company without a Finnish business ID'
  - 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
  - Stage 3, Details of the assignor
    - Country code: Select the country where your entity is registered to

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- 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
- Stage 4, Mandate type: Select 'Right to grant a mandate'
- Stage 5, Assignee: The assignee is a person
- 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
- Stage 7, Mandate theme
  - Mandate theme: Reporting on financial standing and risks
  - Enable an authorisation specifier: Enabled
- 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
- Stage 9, Validity: A mandate submitted by a foreign entity can be valid up to three years
- Stage 10, Mandate details: Check that the following attributes of the mandate are correct
  - Assignor: The client entity
  - Mandate type: Right to grant a mandate
  - Assignees: The 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 visiting Authorisation with an application page and selecting 'View your applications':

<https://www.suomi.fi/e-authorizations/authorisation-with-an-application>

### 3.2 Suomi.fi e-Authorizations service for client entities

Below is a step-by-step guide on how the client entity can send mandates to the service provider. Once the mandates are sent, the service provider will be able to access the FIN-FSA's Reporting System on behalf of the client.

- 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 company
    - VAT ID or a foreign business ID
    - Country code: Your service provider's country code



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- Search by foreign company name, VAT ID or business ID: Your service provider's company name or code
- 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: Your service provider
  - 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: Your service provider
  - Mandate themes: Reporting on financial standing and risks
  - Data collection specifiers: AIFMD
- Once the mandate is validated, your service provider is able to submit AIFMD reports on behalf of your entity.