EBA Guidelines - Remote Customer Onboarding

REMOTE IDENTITY PROOFING - JOINT ENISA & ETSI WORKSHOP

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Remote Customer Onboarding Guidelines – Why these GLs?

- Request from the European Commission in the context of the 'Digital Finance Strategy for Europe'.
  - AMLD provisions do not provide sufficient clarity
  - different approaches followed by the member states
  - challenges regarding the level playing field of the EU market

- Increase demanding of digital tools to onboard customers remotely
  - COVID-19 pandemic accelerate this trend
  - Importance of having reliable and effective means to support remote business customer onboarding and wider remote CDD checks.

Remote Customer Onboarding Guidelines – General Considerations

- Proportionallity

- Remain technologically neutral

- Do not favour or discriminate against particular technological solutions

- Avoid creation of guidelines that might 'expire soon'

- Create safeguards in order to decrease the different types of risks including impersonation fraud risks

Remote Customer Onboarding Guidelines – Structure of the Guidelines

1. Internal policies and procedures

2. Acquisition of information

3. Document Authenticity & Integrity

4. Authenticity Checks

5. Digital Identities

6. Reliance on Third Parties and Outsourcing

7. ICT and Security Risk Management

A word on Digital Identities

- The guidelines do not overstretch the role of eIDAS regulation

- How to prevent gaps in the CDD process when using Digital Identities?

- Will the awaited convergence appear with the creation of a secure Digital Identity at a European level?

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