

Adoption Confirmation Report

*(To be submitted by Account Aggregators and Financial Information Users to ReBIT once the AA client-side application adoption is completed. The document should be sent to **aa-apirelease@rebit.org.in** with a cc to **cgmfintech@rbi.org.in**)*

To,

ReBIT Fintech Team
Reserve Bank Information Technology Private Limited

Subject: NBFC-AA Client Standards Adoption Confirmation Report

Respected Sir/Madam,

This is with reference to the above-mentioned subject; We hereby confirm that we have adopted the latest version **1.0.0** of the AA client-side applications on _____ as specified in “*Standards to Enhance Customer Protection and User Experience within the Account Aggregator Framework.*”

Table 1: Entity Details		
1	Name of the Entity	
2	Type of the Entity	
3	Regulator	
4	Authorized Official Name	
5	Authorized Official Designation	
6	Authorized Official Email	
7	Authorized Official Contact Number	

We, _____ certify that the particulars given above are true and correct to the best of our knowledge and belief.

Place:

Date:

<<Sign>>

Authorized Official

(Head of technology strategy or above)

Name:

Designation:

Annexure:

1. Checklist to be submitted by Account Aggregator and Financial Information Users (FI-Us) entities:

Table 3: Standards (as applicable to AA/FI-U)				
S.No.	Points to be Implemented	Mandatory / Optional	Applicability	Compliance Status (Yes/No)
1.	Customer can link up to two mobile numbers for account discovery	Mandatory		
2.	Optional identifiers (PAN / Date of Birth) for account discovery	Mandatory		
3.	Authentication required for account delinking; ensure active consents revoked	Mandatory		
4.	Customer profile captures minimum details (Name, Verified Mobile, Email) with masking	Optional		
5.	Virtual User Address (VUA) provided as unique identifier	Mandatory		
6.	AA Client checks if account already exists before onboarding	Mandatory		
7.	Account closure facility with revocation of active consents and delinking of accounts	Mandatory		
8.	Account recovery facility (digital/manual) with mobile verification	Mandatory		
9.	Clear presentation of consent fields (Start, Expiry, Fetch Type, FI Types, FI-U, Purpose, Data Range, Frequency)	Mandatory		
10.	Remaining consent fields shown via "View More"	Mandatory		
11.	Voice-based reading of consent parameters	Optional		
12.	Approve/Reject buttons equal size and visibility, no default pre-selection	Mandatory		
13.	Separate Approve/Reject for multiple consents	Mandatory		
14.	Consent expiry mechanisms implemented	Mandatory		
15.	Explicit account selection for consent approval (opt-in, no preselection)	Mandatory		
16.	Consent Dashboard showing active consents and data fetch history	Mandatory		

17.	Tamper-proof audit trail of consent activities	Mandatory		
18.	Immutable consent artefacts	Mandatory		
19.	Robust security practices for consent (encryption, access controls, audits)	Mandatory		
20.	Simple and user-friendly design of AA Client	Mandatory		
21.	Accessibility compliance (WCAG 2.0, alt text, contrast)	Mandatory		
22.	Multi-language support	Mandatory		
23.	FI-P list visible to customers	Mandatory		
24.	Usability testing and feedback mechanisms	Mandatory		
25.	FI-U informs users about redirection to AA Client	Optional		
26.	AA Client displays name/logo prominently	Mandatory		
27.	Tagline “RBI Regulated NBFC-AA” displayed	Optional		
28.	Real-time notifications for account linking, consent approvals/revocations	Mandatory		
29.	Monthly SMS/email updates on active consents and data fetches	Mandatory		
30.	FI-U provides data fetch summaries with customizable frequency	Optional		
31.	Users can customize notification preferences	Mandatory		
32.	Two-Factor Authentication (2FA) implemented	Mandatory		
33.	SIM and device binding for mobile apps	Mandatory		
34.	Browser fingerprinting for web apps	Mandatory		
35.	CERT-In audit before production release and major updates	Mandatory		
36.	Annual security assessments	Mandatory		
37.	Compliance with industry standards and regulations	Mandatory		
38.	Secure integration methods (Deep Linking, Redirection, SDK, iFrame)	Mandatory		
39.	Strong mutual authentication and encryption in integrations	Mandatory		
40.	Responsibilities defined when providing SDK	Mandatory		
41.	FI-U performs due diligence of AA SDK	Mandatory		
42.	AA Client allows users to view/download financial data with explicit consent	Optional		

43.	Data decrypted locally on customer device only	Mandatory		
44.	Downloaded files masked, password-protected, watermarked	Mandatory		
45.	Compliance with DPDP Act, 2023	Mandatory		
46.	Secure communication protocols (TLS v1.2+)	Mandatory		
47.	Secure API integrations with authentication, authorization, input validation	Mandatory		
48.	Certificate pinning or equivalent measures	Mandatory		
49.	Robust encryption for sensitive data at rest/in transit	Mandatory		
50.	Secure key management practices	Mandatory		
51.	Secure coding practices (input validation, output encoding, protection against XSS, injection)	Optional		
52.	Regular code reviews and security audits	Mandatory		
53.	Comprehensive testing (functional, security, performance, compatibility)	Mandatory		
54.	Automated testing frameworks and CI practices	Optional		
55.	Robust error handling without exposing debug logs	Mandatory		
56.	Logging with masked sensitive data	Optional		
57.	Due diligence on third-party libraries/SDKs	Mandatory		
58.	Remote access disabled for mobile app	Mandatory		
59.	Rooted/jailbroken devices blocked	Mandatory		
60.	Secure push notifications	Mandatory		
61.	Runtime Application Self-Protection (RASP)	Mandatory		
62.	Re-authentication after inactivity	Mandatory		
63.	Software Bill of Materials (SBOM) maintained	Optional		
64.	Compatibility with latest Android/iOS versions	Mandatory		
65.	Regular updates for platform features/security patches	Mandatory		
66.	Version governance to phase out old versions	Mandatory		
67.	Public checksum of active version hosted	Optional		

68.	Web app input validation and output encoding	Mandatory		
69.	Web app performance optimization (loading times, caching)	Optional		
70.	Use of CDNs for performance	Optional		
71.	Cross-browser compatibility testing	Mandatory		
72.	Mobile SDK robust authentication mechanisms	Mandatory		
73.	OAuth 2.0 for authorization	Optional		
74.	Secure token management (refresh, invalidate)	Mandatory		
75.	Secure storage (Keychain/Keystore)	Optional		
76.	Access controls restricting SDK data access	Mandatory		
77.	Encryption of SDK payloads	Optional		
78.	Regular vulnerability scans and patches for SDK	Mandatory		
79.	Secure integration mechanisms (API keys, client certificates)	Mandatory		
80.	Security testing (penetration, code reviews)	Mandatory		
81.	Rooted/jailbroken devices blocked for SDK	Mandatory		
82.	Comprehensive SDK documentation	Mandatory		
83.	Developer support channels available	Mandatory		
84.	Adherence to Android/iOS guidelines	Mandatory		
85.	Regular SDK updates	Mandatory		
86.	PKI for sensitive data (OTPs, PINs, passwords)	Optional		
87.	PKI digital signatures for authenticity/integrity	Optional		
88.	SIM binding via outgoing SMS + OTP auto-read	Mandatory		
89.	Device binding via unique identifiers	Mandatory		
90.	Browser fingerprinting for web apps	Mandatory		
91.	Session security with device-bound tokens	Mandatory		
92.	Strong encryption of device identifiers	Mandatory		
93.	Mandatory mobile data during binding	Mandatory		
94.	Restriction on app toggling during binding	Mandatory		
95.	Fallback authentication for SIM/device changes	Mandatory		
96.	Device visibility for customers	Mandatory		
97.	Limit on number of device bindings per user	Mandatory		

98.	Deep Linking integration (URL schema, Intents, Universal Links, secure tokens, fallback, user choice)	Mandatory		
99.	Secure SDK integration with FI-U apps	Mandatory		
100.	Secure iFrame integration with AA Web App	Mandatory		
101.	Secure redirection with FI-U Web App	Mandatory		