

Adoption Progress Report

(To be submitted by Account Aggregators and Financial Information Users to ReBIT every 30 days till the standard 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: Standard to enhance customer protection and user experience within Account Aggregator framework:
Adoption Progress Report

Respected Sir/Madam,

This is with reference to the above-mentioned subject; we are providing the progress report for adopting the Version 1.0.0 of the captioned standard till date

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

The last report was submitted on

Table 1: Reports Details		
1	Report ID	APR/AA_Client_Standards/2026/01
2	Report Type	ADOPTION_PROGRESS_REPORT
3	Report Sub Type	AA_CLIENT_STANDARDS_ADOPTION
4	Submission Date	

Table 2: 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	

Table 3: Standards (as applicable to AA/FI-U)					
S.No.	Points to be Implemented	Mandatory / Optional	Applicability	Implemented (Yes/No)	Remarks
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			

We,
hereby confirm that all the details as requested in this report are completely provided. Furthermore, we
certify that the details furnished in this report are true and correct to the best of our knowledge and
belief.

Place:

Date:

Authorized Official

(Head of technology strategy or above)

Name:

Designation: