

Consultation on the partial revision of Circular 2016/7 “Video and online identification”

Key points

16 December 2025

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1. Circular 2016/7 “Video and online identification” was periodically adjusted to reflect technological developments.
2. Owing to the Federal Act on Electronic Identity Credentials and Other Electronic Credentials, which is expected to enter into force in mid-2026, a further partial revision of the circular is pending. In Switzerland, electronic proof of identity, the so-called E-ID, should work like a digital identity card and enable secure digital identification between private individuals and with authorities. The E-ID is authorised for financial intermediaries as an alternative identification document for the digital opening of client relationships in accordance with the AMLA.
3. Internationally, QR codes are increasingly being used on identification documents as security features in addition to a machine readable zone or instead of a machine readable zone. To take account of this development, official identification documents with a QR code should also be able to be used for identification purposes within the scope of FINMA Circular 16/7.
4. In the case of identification by electronic copy of an identification document with a qualified electronic signature, the contracting party’s residential address must now also be checked in order to take account of the lack of direct interaction in the online identity verification process.
5. The identification of a person who enters into a business relationship with a financial intermediary on behalf of a legal entity or partnership may also be carried out in accordance with the requirements for an electronic copy of an identification document with a qualified electronic signature, for identification with an E-ID or for digital authentication.