

Survey and application platform (EHP)

The role of the authorisation administrator

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1 Introduction

Reference:

This document outlines the most important duties and functions of the authorisation administrator (BVA) in the survey and application platform (EHP) of the Swiss Financial Market Supervisory Authority (FINMA).

2 What is an authorisation administrator?

The BVA assumes a central role in using the EHP at the supervised institution or audit firm¹:

- The BVA manages the user administration and assigns authorisation rights to registered users. This includes registering, changing, deleting and certifying users. The BVA is as well responsible for ensuring all persons at the relevant institution are assigned the rights corresponding to their function or role. FINMA accordingly delegates the authorisation management. Only the authorisation administrators are confirmed in advance and managed by FINMA (see chapters 3 & 6).
- Following the publication of surveys by FINMA, the BVA is informed by email. He then assigns the incoming surveys to the responsible person for further processing, thus ensuring the institution is ready to receive the digital surveys (see chapter 8).
- The BVA can notify FINMA electronically of changes to selected master data (see chapter 7).
- The BVA is the single-point-of-contact (SPOC) for in-house enquiries and acts as an extension of FINMA for support requests (see chapter 11).

¹ Unless stated otherwise, the term "institution" is used in this document for a supervised institution (banks, insurers, fund management companies etc.) and for audit firms.

3 Registration of an authorisation administrator

Reference:

3.1 Initial registration

A minimum of two BVAs per institution must be registered with FINMA. The initial registration and changing of a BVA occurs exclusively via electronic transfer of an online form on the FINMA website ([Link](#)²). Following receipt of a registration, FINMA confirms the details in writing with a confirmation letter. On expiry of the deadline given in the confirmation letter, the registered BVAs (assuming the institution does not provide instructions to the contrary) receive a registration email (see Fig. 1), to log on as EHP users.

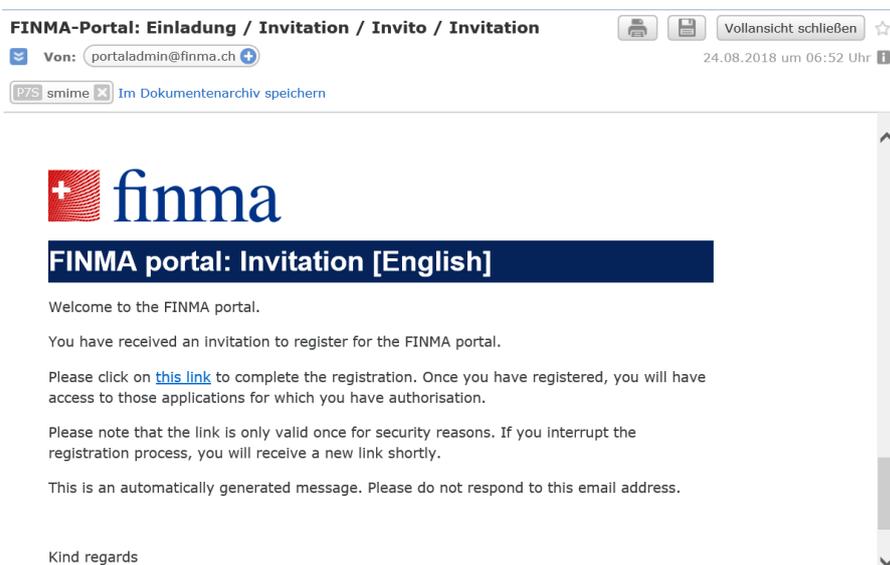


Fig. 1: Registration email

Following a successful initial registration in the FINMA portal³, the BVA can access the EHP.

3.2 Logging in to the FINMA portal

The BVA and all registered EHP users can log in to the EHP with the data stored through the registration process. The portal (see Fig. 2) is accessible via the URL <https://portal.finma.ch> or the FINMA website.

² Currently only available in German and French.

³ The FINMA portal offers the necessary portal functions (registration, login etc.) so users can log in to selected FINMA applications (see Fig. 4).



Reference:

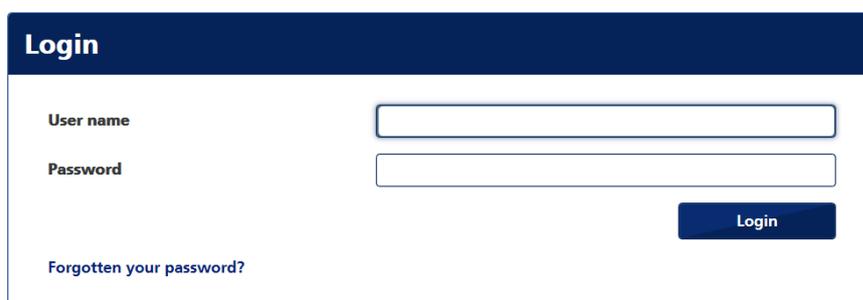


Fig. 2: Entry mask FINMA portal

On entering their user name and password, the user receives an SMS code on his registered mobile number. The SMS code is an additional safety feature (2-factor authentication). The BVA is requested to enter the code into the mask (see Fig. 3).

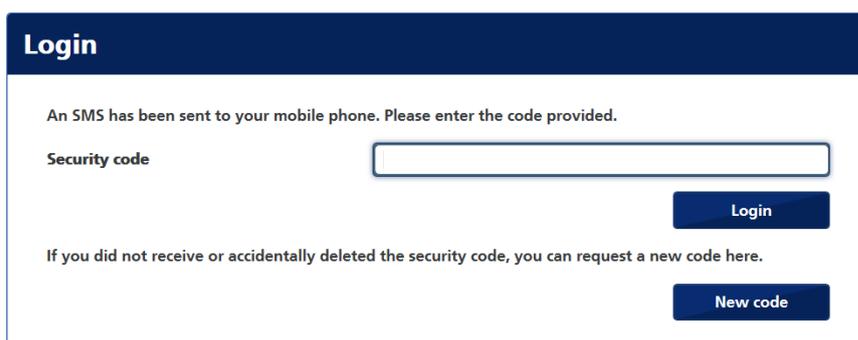


Fig. 3: SMS security code

The user can then access all applications he is authorised to use, in this instance the EHP (see Fig. 4):

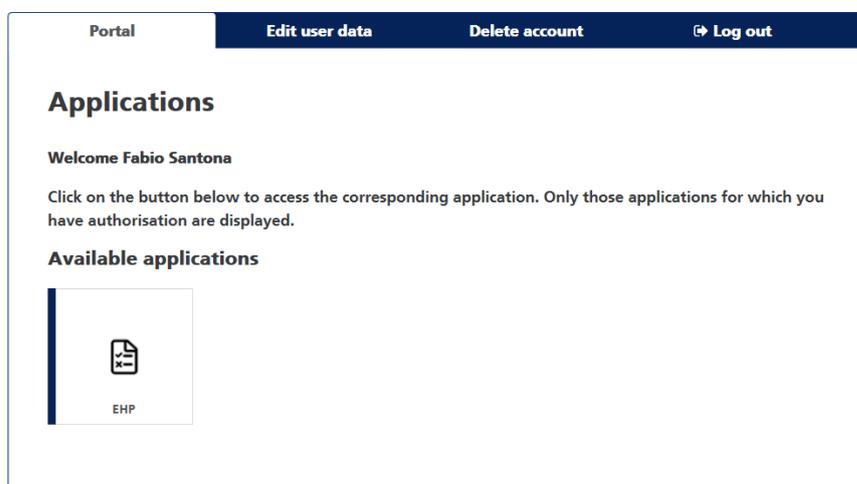


Fig. 4: Applications that are available for the registered user

Please note:

- Access will be blocked after six failed login attempts. The user can unblock himself by clicking on "**Unlock**" (see Fig. 5), by entering the SMS code sent to his registered mobile number.
- If the user has forgotten the password, he can reset it himself (see Fig. 2).

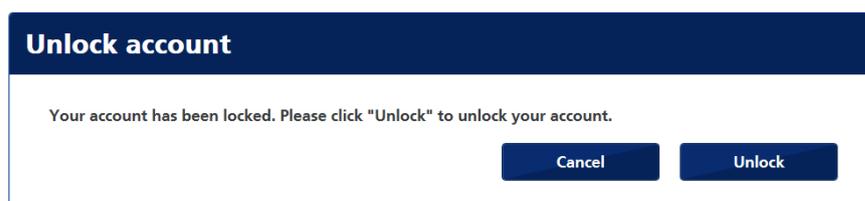


Fig. 5: Unlock the account

4 Changing an authorisation administrator

Reference:

FINMA must be informed of changes relating to a BVA. There is an online form for that – as with the initial registration process – on the FINMA website ([Link](#)⁴). No other format will be accepted (e.g. by post or email). The following changes can be made (there is a specific online form for each change type):

Registration of a new BVA

Registration form for a person assuming the role of a BVA for the first time. If the person is using the EHP for the first time, he must register as an EHP user in the portal (see chapter 3.1)⁵.

Changing/deleting a current BVA

Registration form for a BVA reporting a change (e.g. new contact data) or deletion (e.g. a BVA leaving the institution). An application to change an email address automatically entails withdrawal of rights and the creation of a new account with the new email address. The old account will no longer have BVA authorisation and it can be edited according to the instructions in chapter 5.2.

Replacing a current BVA

This form has to be used when a current BVA is being replaced or succeeded by a new person (e.g. a BVA is leaving the institution and his role is thus transferred to another person).

All registrations are subsequently processed by FINMA and the institution is informed of the changes in writing. The amendments are approved on expiry of the deadline given in the confirmation letter, provided the institution has not instructed otherwise. If a deletion is requested, the BVA's rights will be directly withdrawn on receipt of the deletion request.

⁴ Currently only available in German and French.

⁵ Note: If the person is already registered as an EHP user in the portal, he will simply be assigned BVA rights. That happens, for example, if a person previously had another role in the EHP and has now been nominated as an BVA.

5 User administration

Reference:

The BVA can administer the EHP users via the "**Administration**" menu item (see Fig. 6).

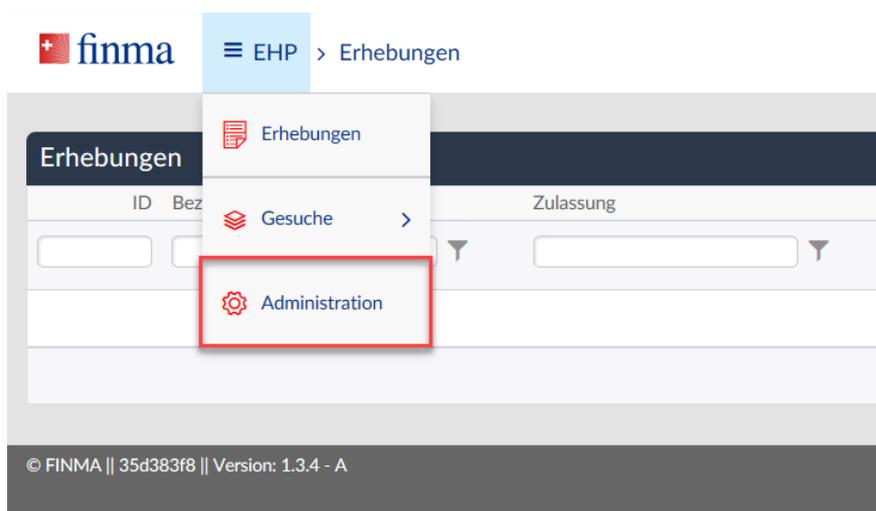


Fig. 6: Administration menu

In the administration mask the BVA has a range of options to create and to manage users. They are explained in detail in the following chapters.

5.1 Adding a new user

The "**Add user**" button is for creating new users. The following information is required to create a new user (see Fig. 7): First name, last name, email address and allocation of role (see chapter 6). It is important to distinguish between an internal and external user.

Internal users: The BVA classifies users working at the institution as "internal user". Internal users are employees of the institution.

External users: The BVA classifies users who do not work at the institution as "external user". These users are normally service providers (e.g. a third party working on an application or survey) and they perform specific assignments on behalf of the institution. External users thus act on behalf of the institution that explicitly authorised them to use the EHP.

Internal and external users have different rights and views as outlined in chapter 6.

When the BVA has added a new user, the new user will receive an invitation to register by email (see chapter 3.1). The newly created user can access the EHP following the initial successful registration.

Reference:

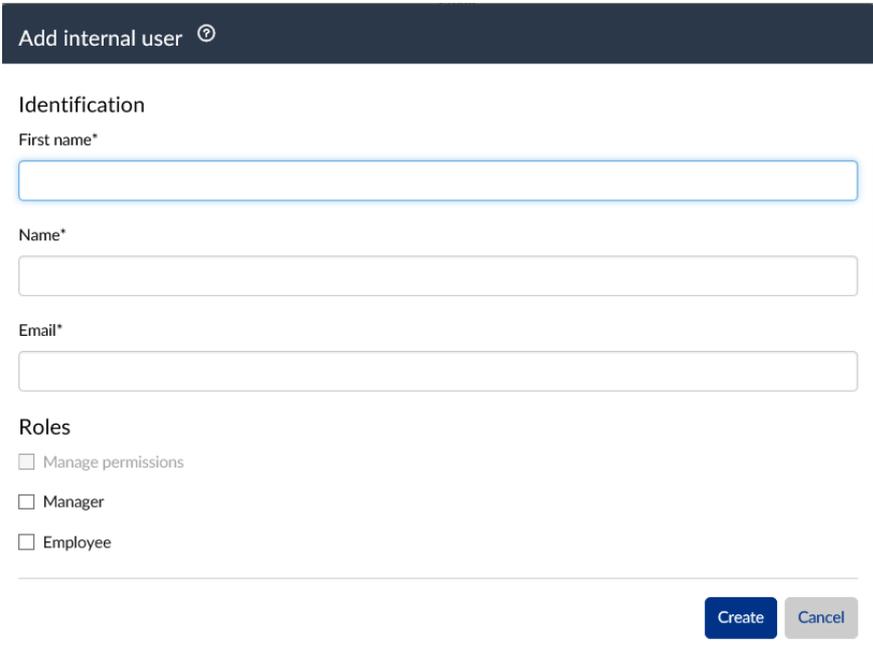


Fig. 7: Adding a new user

Please note:

- The email address serves as a unique user name and is not checked through the EHP. An error in entering the email address may result in a) the invitation to register sent by email not actually being sent or b) an unauthorised person receiving access (if another person receives the email due to a typing or spelling error).
- It is not possible to use one email address twice. The system will generate an error message (see Fig. 8).

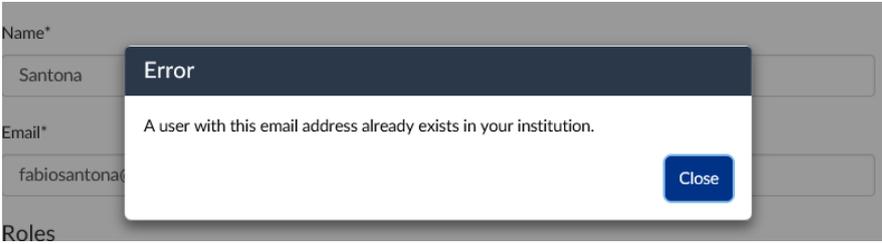
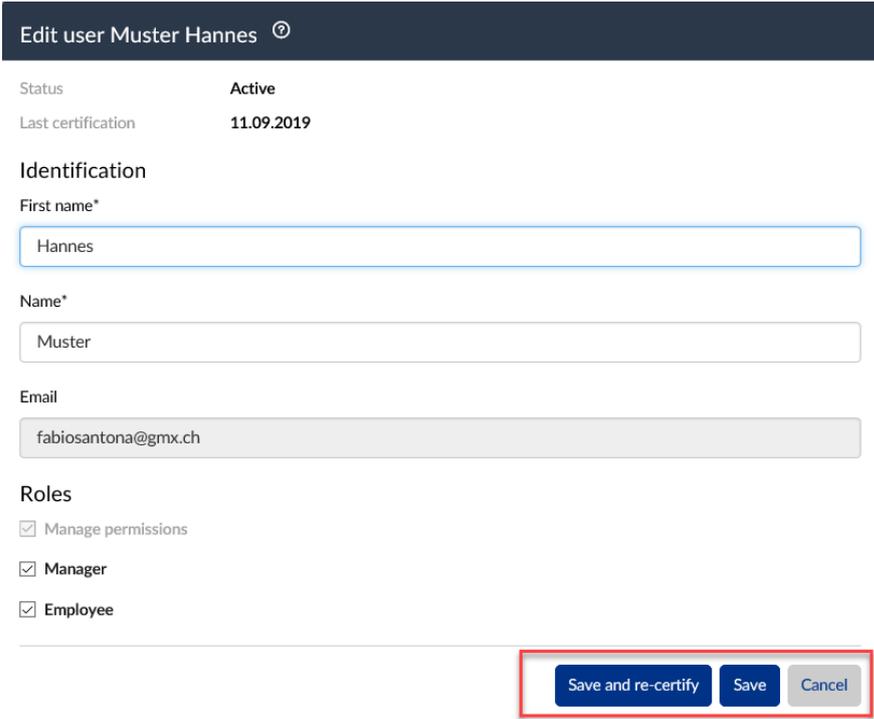


Fig. 8: Error message when a user with the same email address want to be added

5.2 Change user

Reference:

A current EHP user can only be changed to a certain extent, i.e. the BVA can change the first name, last name and role at any time. The BVA just has to open the user in Administration and amend the values (see Fig. 9). The changes are stored by clicking "**Save**" or "**Save and re-certify**".



The screenshot shows a user management interface. At the top, there is a dark header bar with the text 'Edit user Muster Hannes' and a help icon. Below this, the user's status is 'Active' and the last certification date is '11.09.2019'. The 'Identification' section contains three input fields: 'First name*' with the value 'Hannes', 'Name*' with the value 'Muster', and 'Email' with the value 'fabiosantona@gmx.ch'. The 'Roles' section has three checked checkboxes: 'Manage permissions', 'Manager', and 'Employee'. At the bottom right, there are three buttons: 'Save and re-certify' (highlighted with a red box), 'Save', and 'Cancel'.

Fig. 9: Edit a user

However, it is not possible to change an email address as it is used for account identification. If a user within an institution receives a new email address (e.g. because of a new name), a new user must be created with the new email address (see chapter 5.1). In this case the old user is obsolete and can be deleted.

Please note:

- The institution cannot make any changes to the BVA role as it is managed by FINMA. If a BVA has to be changed or deleted, FINMA must be notified.
- A user may have other authorisations besides being a BVA (see chapter 10.1). In that case a "deletion order" to FINMA is required for the exclusive withdrawal of BVA authorisation. The further deletion of the account is as outlined in chapter 5.3

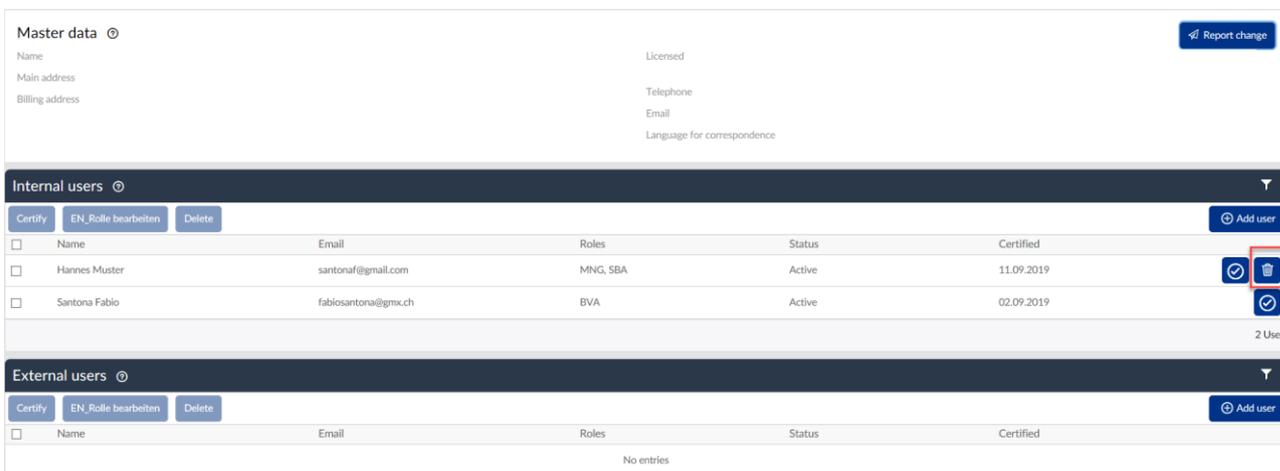
- A name change is not automatically reconciled between the EHP and FINMA portal. A name changed by the BVA must be manually entered or changed by the user by logging into the FINMA portal and clicking on **“Edit user data”** (see Fig. 4).

Reference:

5.3 Delete user

Every BVA can delete added users (for example due to departure or a new internal position). A user can be deleted in the EHP via the **“Recycle Bin”** button (see Fig. 10). Caution is advised when deleting. Prior to deleting a user, the user’s allocation to an ongoing survey or application must be checked. The user should not be deleted if he has rights to a specific survey or application, the rights must first be transferred to another active user. The following steps must be taken in the following order before the BVA deletes a user:

Step	Activity
1	Check whether the user is actively involved in a survey or application.
2	Transfer the survey or application to another user.
3	Delete the user in the administration mask



The screenshot shows the user management interface. It is divided into three sections: Master data, Internal users, and External users. The 'Internal users' section contains a table with the following data:

Name	Email	Roles	Status	Certified	Actions
Hannes Muster	santonaf@gmail.com	MNG, SBA	Active	11.09.2019	[Check] [Delete]
Santona Fabio	fabiosantona@gmx.ch	BVA	Active	02.09.2019	[Check] [Delete]

The 'Delete' icon (trash can) for the user 'Santona Fabio' is highlighted with a red box. The 'External users' section below it is empty, showing 'No entries'.

Fig. 10: Deleting a user

Please note:

- The institution cannot delete BVA users as the BVA role is only managed by FINMA. If a BVA has to be changed or deleted, FINMA must be notified (see chapter 4).

- Once FINMA has processed the notification and deleted the BVA, the BVA loses his BVA rights for the EHP. The **"Recycle Bin"** symbol will then appear by the outgoing BVA (see Fig. 10) and another BVA can then delete the user.

Reference:

5.4 Certify user

The EHP is configured so that all active users have to be confirmed by the BVA after a year. That is done via the **"Save and re-certify"** function. The user must first be opened in the Administration menu (see Fig. 10). Users automatically lose their access rights to the EHP one year following their last certification. They receive a notice from the system on logging on that their user account has expired and must be renewed. The user must contact his BVA in such an event. If the last certification was two years ago, the user will be deleted automatically by the system.

Please note:

- BVAs do not require certification. FINMA manages the BVAs and they remain active until the institution requests a change (see chapter 5).

Reference:

6 Administration of authorisation in the EHP

Authorisations in the EHP are managed according to the following principles:

- The created user is allocated an authorisation role (see Table 1).
- The specific access management is always via the explicit allocation of users to surveys or applications. Only an authorised party can see all the information pertaining to a survey or application dossier. Sole exception: the BVA sees all the details of applications even if he does not have explicit authorisation for the application.
- An internal and external user can basically be assigned the same roles. Unlike internal users, external users do not see the approved status of authorisations. They only see those applications (independently of the approval status), for which they have explicit authorisation⁶. The approved data can be seen in the authorisation's approved status. No submitted attachments are displayed in approved status, in contrast to an authorisation application.
- There is no difference with the surveys as all users only see those surveys for which they have explicit authorisation.
- The following table shows the roles per institution type⁷ and the associated user rights:

Supervised institution		
	Supervisory/survey process	Authorisation/application process
Manager role	<ul style="list-style-type: none"> • Process surveys • Validate surveys • Submit surveys • Assign administrative assistant "his" surveys 	<ul style="list-style-type: none"> • Create, edit applications • Submit applications • Assign administrative assistant "his" applications • See approved applications
Employee role	<ul style="list-style-type: none"> • Process surveys • Validate surveys 	<ul style="list-style-type: none"> • Edit applications • See approved applications

⁶ An already approved application is visible for all internal users who have access to the EHP. However, attachments to an application can still only be viewed by those users who are explicitly authorized.

⁷ Pro memoria: the EHP differentiates between supervised institutions (banks, insurers, fund management companies etc.) and audit firms.

Reference:

Audit firm		
	Supervisory/survey process	Authorisation/application process
Lead auditor role	<ul style="list-style-type: none"> • Process surveys • Validate surveys • Submit surveys • Assign auditor "his" surveys 	<ul style="list-style-type: none"> • n.a.
Auditor role	<ul style="list-style-type: none"> • Process surveys • Validate surveys 	<ul style="list-style-type: none"> • n.a.

Table 1: EHP roles

Please note:

- The key difference between "Manager <> Employee " at a supervised institution and "Lead auditor <> Auditor" at an audit firm relates to the right to submit surveys and/or applications. The manager can also create new applications in the application process.
- However, institutions can only issue applications if they are licensed accordingly in the field of insurance (for changing business plans) or in the field of collective investments (CISA) (for initial approval and approval for changes to products).⁸

⁸ In the near future, it is possible that further application processes will be launched.

7 Reporting changes in the institution's master data

Reference:

In addition to user administration, the BVA can report selected EHP-specific master data changes via the **"Report change"** button (see Fig. 11). If the BVA clicks on that button, the user's corresponding email program opens automatically.

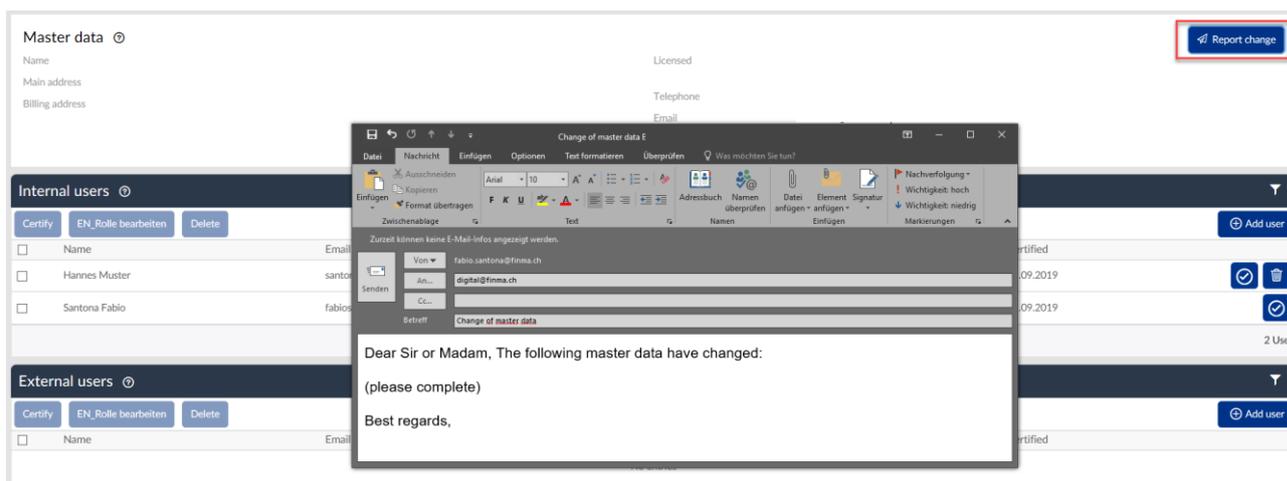


Fig. 11: Reporting changes for selected master data

The following master data changes can be reported via the EHP:

- Address (main address, billing address etc.)
- Contact data (telephone, fax, email)
- Correspondence language

All other relevant changes to master data are to be communicated via the usual channels.

8 Surveys

Reference:

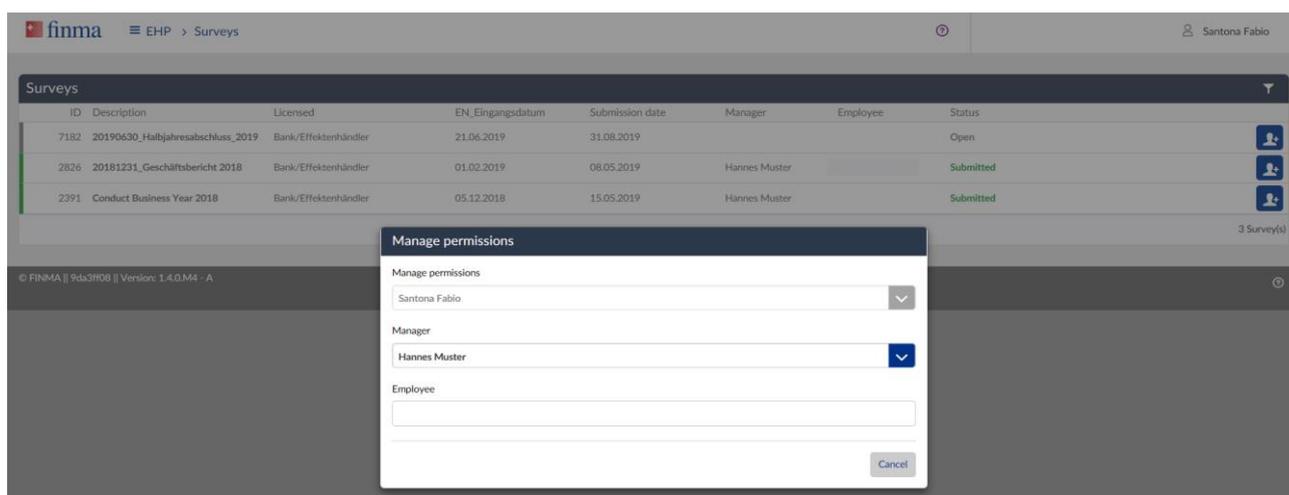
The BVA has the task of ensuring the institution is ready to receive surveys electronically via the EHP. **Only an institution's BVAs are informed** by email when a new survey has arrived from FINMA. The BVA's task is then to allocate the new surveys to the assigned users (see Fig. 12). The BVA allocates surveys to the responsible lead auditors at the audit firms. The surveys cannot be processed until they have been allocated. The institution is therefore responsible for ensuring at least one BVA is available at all times to perform the allocation.



ID	Description	Licensed	EN_Eingangsdatum	Submission date	Manager	Employee	Status
7182	20190630_Halbjahresabschluss_2019	Bank/Effektenhändler	21.06.2019	31.08.2019			Open
2826	20181231_Geschäftsbericht 2018	Bank/Effektenhändler	01.02.2019	08.05.2019	Hannes Muster		Submitted
2391	Conduct Business Year 2018	Bank/Effektenhändler	05.12.2018	15.05.2019	Hannes Muster		Submitted

Fig. 12: Allocation of users to a new or existing survey

The BVA can authorise registered users for the survey via **"Manage permissions"** (see Fig. 12 and Fig. 13). That is why a "manager" or "lead auditor" for audit firms is required. The "manager" and "lead auditor" can then authorise other persons as administrative assistants or auditors for a specific survey, provided the BVA has already assigned these persons the corresponding authorisation role as EHP users⁹.



ID	Description	Licensed	EN_Eingangsdatum	Submission date	Manager	Employee	Status
7182	20190630_Halbjahresabschluss_2019	Bank/Effektenhändler	21.06.2019	31.08.2019			Open
2826	20181231_Geschäftsbericht 2018	Bank/Effektenhändler	01.02.2019	08.05.2019	Hannes Muster		Submitted
2391	Conduct Business Year 2018	Bank/Effektenhändler	05.12.2018	15.05.2019	Hannes Muster		Submitted

Manage permissions

Manage permissions

Santona Fabio

Manager

Hannes Muster

Employee

Cancel

Fig. 13: Assign a user to a new survey

⁹ If the dropdown menu under "Manage permissions" is empty, it means the BVA has not yet assigned the role of manager or the role of an employee to any user under the "Administration" menu item.

Provided the BVA has allocated the role of "manager" or "lead auditor" to the relevant persons, they will receive the email notification. The users can then administer and submit the survey themselves.

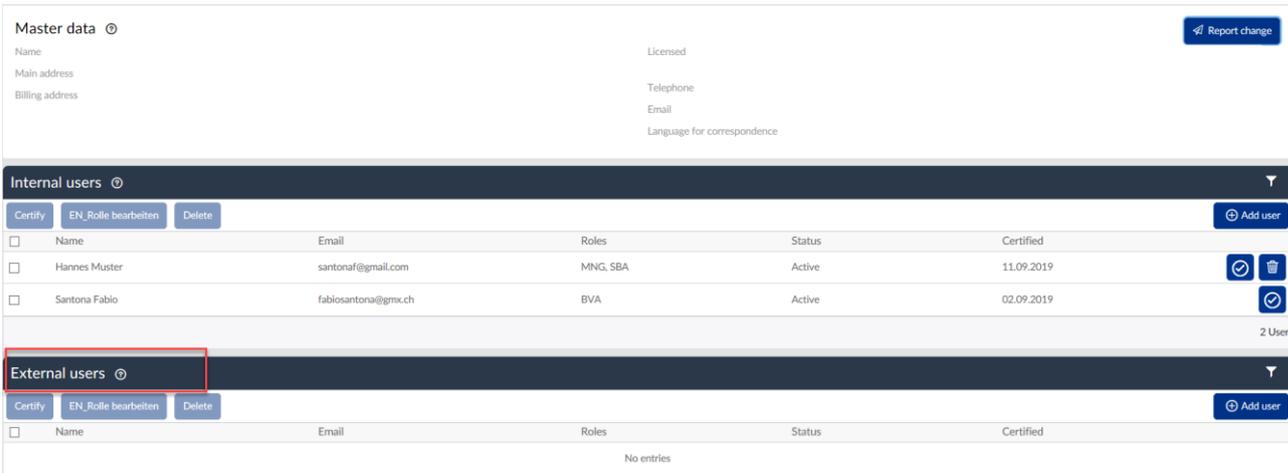
Reference:

9 Applications

Reference:

The task of the BVA in the application process is to create users (see chapter 5). Users who have been allocated the role of “manager” can create, edit and submit applications themselves. As shown in chapter 6, there is a distinction between internal and external users. This distinction has an important role in the application process. Mandated third parties (e.g. law firms) often submit the application on behalf of the institution. They act on behalf of the institution as an external user. As opposed to internal users, external users can only see those applications by the institution for which they have authorisation. External users therefore never have a full overview of all the applications submitted and approved for an institution, unless an external user is involved in all the applications pertaining to the institution. Internal users see all approved applications by an institution and the current state of an application for which they have authorisation.

If the BVA creates an external user (see Fig. 14) the user only has reading and writing rights for those applications for which he has explicit authorisation or which he has created independently in the role of a manager.



The screenshot displays a user management interface. At the top, there is a 'Master data' section with fields for Name, Main address, Billing address, Licensed, Telephone, Email, and Language for correspondence. Below this is the 'Internal users' section, which contains a table with columns for Name, Email, Roles, Status, and Certified. Two users are listed: Hannes Muster (santonaf@gmail.com, MNG, SBA, Active, 11.09.2019) and Santona Fabio (fabiosantona@gmx.ch, BVA, Active, 02.09.2019). The 'External users' section is currently empty, showing 'No entries'. The 'External users' header is highlighted with a red box.

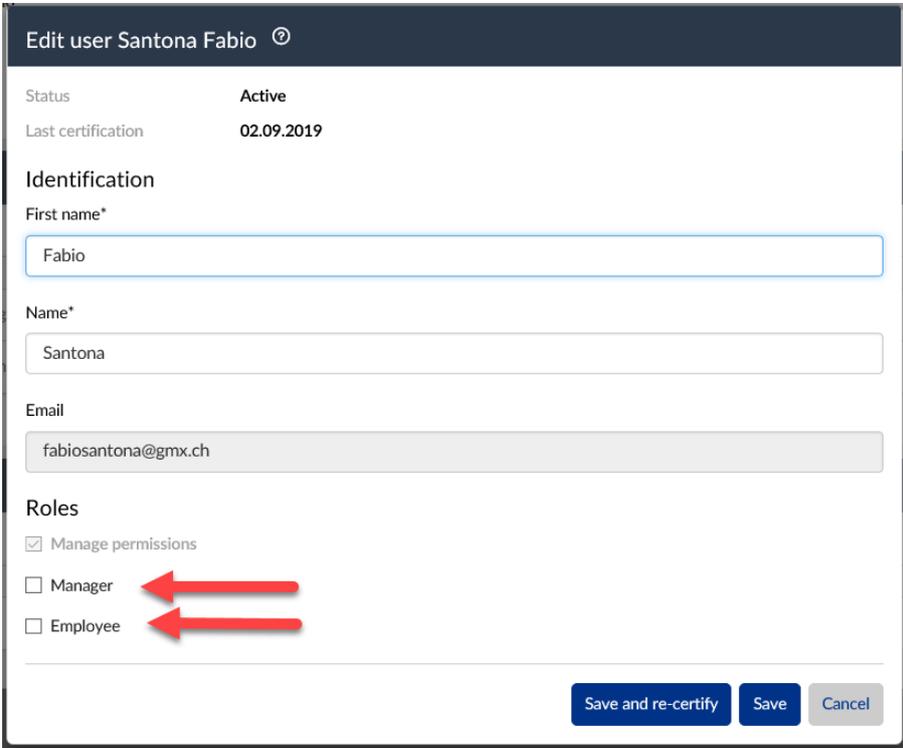
Fig. 14: External users

10 Special cases

Reference:

10.1 Authorisation administrator with different roles

The BVA can also give himself additional rights. He can do that by opening the Administration in the menu, editing his user and allocating himself the role of "manager" and/or "employee" (see Fig. 15). This allocation can be expedient for smaller institutions (e.g. fund management companies). For example, a BVA could allocate himself a survey in the role of "manager" and therefore be able to edit and submit the survey to FINMA. The EHP does not require the four-eye principle. However, it does allow the institutions to complete and submit surveys according to the four-eye principle.



The screenshot shows a web form titled "Edit user Santona Fabio". The form contains the following fields and options:

- Status: Active
- Last certification: 02.09.2019
- Identification section:
 - First name*: Fabio
 - Name*: Santona
 - Email: fabiosantona@gmx.ch
- Roles section:
 - Manage permissions
 - Manager (indicated by a red arrow)
 - Employee (indicated by a red arrow)

At the bottom right, there are three buttons: "Save and re-certify", "Save", and "Cancel".

Fig. 15: The BVA gives himself more roles

10.2 Authorisation administrator with a group mailbox

Every account in the FINMA portal is personal, i.e. registration is via personal email address and the personal mobile number. The BVA with a personal email address also creates EHP users. As regards surveys (see chapter 8) all BVAs in an institution are informed when FINMA has published a new survey. The notifications are sent to the personal email addresses. As an alternative, a BVA at an institution can register with a specific group mailbox. As each email address can only be used once per institution only one

BVA can register with the group mailbox. The use of a group mailbox comes with certain conditions:

Reference:

- The group mailbox address is allocated to a natural person at FINMA for administrative purposes. The person using the address of the group mailbox for EHP registration must be clearly identified on the online notification form (see chapter 3). The person must give his mobile number when registering and can then log on as an individual person to that EHP account.
- If the person registered with the group mailbox to access the EHP changes, the institution must report the change in personal data for the account to FINMA (see chapter 4). Moreover, the previous and new person can change their mobile number independently in the FINMA portal (see Fig. 4).

Once the BVA receives a notification, it can be seen by all persons within the institution who have access to the group mailbox. All persons with access to the group mailbox therefore automatically see an incoming survey without having to be a BVA in the EHP. The allocation of surveys to a manager or lead auditor in the EHP can only be executed by one person with the role of BVA.

11 Specific support cases

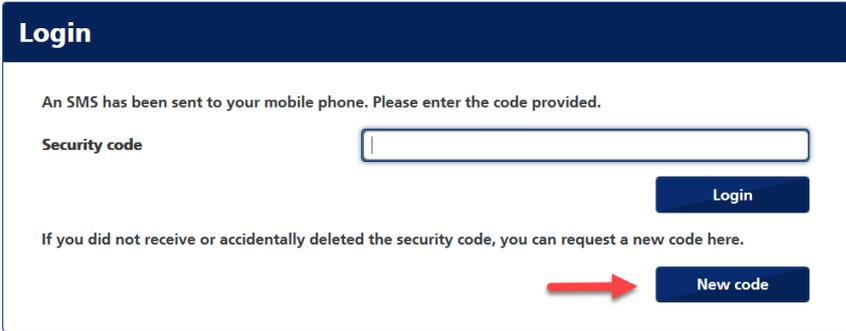
Reference:

11.1 User mistakenly deletes the account in the FINMA portal

If a user mistakenly deletes his account in the FINMA portal (see Fig. 4), the account is automatically deactivated. The same applies to the BVA. In that case FINMA must be contacted via digital@finma.ch. FINMA retains the right to contact the BVA by telephone. In that case, the BVA is identified via the identification number, which has been provided in the confirmation letter and other features known to FINMA. FINMA will then reactivate the account.

11.2 SMS code is not sent

Every user has to log in to the FINMA portal with their email address and password. The user then receives an SMS code as an additional security feature. If this SMS code is not received, you can ask for a new one (see Fig. 16).



The screenshot shows the 'Login' page of the FINMA portal. At the top, there is a dark blue header with the word 'Login' in white. Below the header, a message states: 'An SMS has been sent to your mobile phone. Please enter the code provided.' There is a text input field labeled 'Security code' with a cursor inside. To the right of the input field is a dark blue button labeled 'Login'. Below the input field and button, another message reads: 'If you did not receive or accidentally deleted the security code, you can request a new code here.' To the right of this message is a dark blue button labeled 'New code'. A red arrow points to the 'New code' button.

Fig. 16: Order new SMS code

If the new SMS code is not received either, FINMA can be contacted via digital@finma.ch. FINMA retains the right to contact the BVA by telephone. In that case, the BVA has to identify himself through the identification number in the confirmation letter and other features.

11.3 Registration email does not arrive

When FINMA creates a BVA in the system on expiry of the deadline given in the confirmation letter (see chapter 3), the BVA will receive a registration email. The email normally arrives within 24 hours of the deadline expiring. If the BVA does not receive the email, take the following steps.

Step	Activity
1	Check the SPAM folder.
2	Contact FINMA via digital@finmach . FINMA reserves the right to call the BVA. In that case, the AC has to identify himself through the identification number given in the confirmation letter and other features.

Reference:

The same applies for users created by the BVA at the institution. Once a BVA has registered a new user in the EHP, the user will receive a registration email within 24 hours. If the email is not received, the user must contact his BVA who will follow the above procedure.

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