



KPMG AEOI Updates & Tracking Service FATCA Alert



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Country:	Finland	Regime:	FATCA
Document Type:	Other Guidance		

Finland: Issued Update on Extension of Temporary Relief for Missing U.S. TINs

On 01 September 2025, the Tax Administration of Finland updated its webpage on “Missing U.S. Tax Identification Number (TIN)” to reflect the extension granted by the Internal Revenue Service (IRS) Notice 2024-78 (found [here](#)) to the temporary relief originally provided under Notice 2023-11 (found [here](#)) (see [here](#) for a detailed KPMG Alert on the relief provided under Notice 2023-11). The temporary relief for Financial Institutions (FIs) unable to obtain and report U.S. TINs for specified pre-existing U.S. reportable accounts has now been extended to cover the reporting years 2025, 2026, and 2027.

During this period, the absence of a U.S. TIN for a pre-existing U.S. account will not be considered a material reporting failure, provided that FIs comply with the following obligations:

- Obtain and report the date of birth of each individual account holder and controlling person whose U.S. TIN is not reported.
- Annually request any missing U.S. TIN from each account holder. For this purpose, FIs must select the most effective communication method to reach the account holders, including either:
 - The web address of the U.S. State Department’s Joint FATCA Frequently Asked Questions (FAQs) (found [here](#)), or
 - A copy of the FAQs and either: 1) a copy of the relief procedures published by the IRS for specific former citizens, or 2) the web address (found [here](#)) for such procedures.

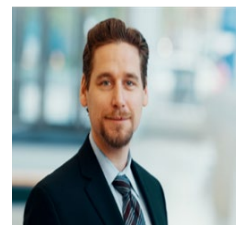
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- Annually search the electronic archive maintained by the FI for any missing required U.S. TINs.
- Report the appropriate TIN code provided by the IRS for each account missing a required U.S. TIN (see Section 6.3.3.1 of the FATCA Technical Instructions, [here](#), for further details).
- Report a foreign tax identification number (FTIN)—such as a Finnish personal identification number—in the annual FATCA return for each specified U.S. account that does not have a U.S. TIN, if the FTIN is found during the FI's electronic archive search.
- Using the 'AddressFix' structure, report the city and country of residence for each account that is missing a required U.S. TIN.

Additionally, to benefit from the temporary relief, FIs must retain all documentation collected in previous years under Notice 2023-11 until the end of 2031.

Reference: [Missing U.S. TINs](#)

For information on KPMG's global AEOI network professionals, please email [GO-FM AEOI Program Support](#).

For more information on KPMG AEOI Updates & Tracking Service, please see [here](#).

For additional summaries of the latest AEOI developments, please visit KPMG's TaxNewsFlash-FATCA/IGA/CRS Insights page, [here](#).

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