



KPMG AEOI Updates & Tracking Service FATCA Alert

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Finland: Releases Updated FATCA Technical Guidance

On 15 September 2025, the Tax Administration of Finland issued an updated version (v3.4) of its FATCA technical guidance.

The changes in the FATCA technical guidance are detailed below:

- Section 5.1, “*Correcting Information*,” now clarifies that when a Reporting Financial Institution (RFI) needs to remove previously reported individual account information, the ‘FATCA3’ (void data) code must be used in the ReportingFI structure.
- Section 6.3.3.1, “*Account Holder structures/Individual*,” has been updated to reflect two additional requirements outlined in IRS Notice 2024-78:
 - Reporting of a foreign Tax Identification Number (FTIN); and
 - Use of the ‘AddressFix’ structure.

By meeting these requirements, RFIs will qualify for extended temporary relief for missing U.S. Tax Identification Numbers (TINs) for the reporting years 2025, 2026, and 2027 (see [here](#) for a detailed KPMG Alert on extension of temporary relief for missing U.S. TINs).

- A new note clarifies that when a U.S. TIN is available, reporting a FTIN for the account holder or controlling person is not required.
- Another note indicates that starting with the 2025 reporting year, the use of the country code of the jurisdiction that issued the TIN in the IssuedBy field will be permitted.

Finland Contacts:



Pauliina Laine
Director
Pauliina.Laine@kpmg.fi



Kaj Grüssner
Partner
Kaj.Grussner@kpmg.fi

- Section 6.4.2.1, “*AddressFix*,” has been updated to incorporate the requirement related to the ‘AddressFix’ structure as outlined in IRS Notice 2024-78.
- Section 6.4.3, “*DocSpec Structures*,” now mandates reporting of the Business ID and tax year under the DocRefId element.
- Section 7, “*List of Automated Checks Made by Ilmoitin*,” has been updated as follows:
 - AccountHolder/Individual/TIN and SubstantialOwner/Individual/TIN: Automated validation will apply only to U.S. TINs.
 - AccountHolder/Organisation/TIN: The previously accepted TIN value 'AAAAAAA' has been removed.
 - AccountHolder/Individual/TIN/IssuedBy and SubstantialOwner/Individual/TIN/IssuedBy: These elements will be discontinued starting with the 2025 reporting year.
- Section 8, “*List of Messages from Ilmoitin*,” clarifies that system-generated alerts related to AccountHolder/Individual/TIN, .../Individual/TIN, and .../Individual/BirthInfo/BirthDate will now trigger only when the TIN is issued by the U.S.

Reference: [FATCA Technical Guidance](#) [PDF 1,041KB]

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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](#).

Contact us



Laurie Hatten-Boyd
Principal
T: +1 206 213 4001
E: lhattenboyd@kpmg.com

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Kelli Wooten
Principal
T: +1 404 739 5888
E: kwooten@KPMG.com

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