

AML Days Sweden – April 2026

The eIDAS Mandate: Mastering the Future of Identity Verification for AML



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Imagine...

A fast-growing Swedish fintech

- You have perfected digital onboarding
- You rely on BankID
- The results
 - Flawless UX
 - Sky-high conversion
 - Happy compliance team

Expanding to the rest of Europe is the obvious choice



The nightmare of scaling

The Netherlands

- Not allowed to use the government issued eID
- Identity document scan is commonly used
- Combined with the 'BankID' to retrieve address
- Use of national identity number not always allowed



The nightmare of scaling

Germany

- Adoption of government issued eID is very low
- Identity verification via video conference is commonly used
- German AML requires an additional step on top of a QES
- A national identity number does not exist



A Patchwork of 27 national rules

- CDD AML Directives
- Translations into national law
- Various CDD practices



The game changer: The EU's single AML Rulebook



EU 2024/1624

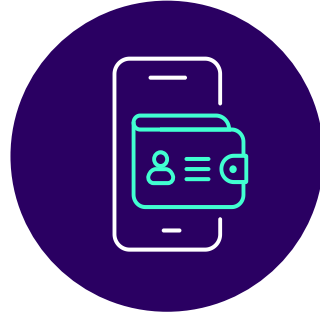
Article 22.6

- **Identity document, passport or equivalent**
- **eIDAS toolkit**

The eIDAS toolkit: Your new compliance levers



eID
eIDAS notified
electronic identity



EUDI Wallet
EU & EEA
Digital Identity Wallet



QES
Qualified Electronic
Signature

EUDI Wallet

The Member States are required to issue a wallet and identity to all citizens

- All (E)EU residents will have (free) access to a mobile national eID
- With government-grade assurance
- Usable with public and private services
- Across borders
- Extensible with verified attributes from different (qualified) sources
- This is part of the amended eIDAS regulation

Deadline December 2026

Legislation

Next to its core legislation, eIDAS currently covers:

- 33 Implementing Regulations (CIR)
- 26 Draft Implementing Regulations
- 6 Implementing Decisions (CID)
- Updates & public consultations on the CIRs

National policies on:

- Certification schemes
(including wallets, PID and onboarding)
- Relying Party Registration

Non-harmonised requirements from overlaps with:

- NIS2, DORA, DSA, DMA, AMLR, CRA



A new hierarchy for remote identity verification



Article 7 Draft RTS on Customer Due Diligence

To comply with the verification requirements pursuant to Article 22(6) of Regulation (EU) 2024/1624 in a non-face-to-face situation, obliged entities **shall use electronic identification** means that meet the requirements of Regulation (EU) No **910/2014** with regard to the assurance levels ‘**substantial**’ or ‘**high**’, or relevant **qualified trust services** as set out in that Regulation.

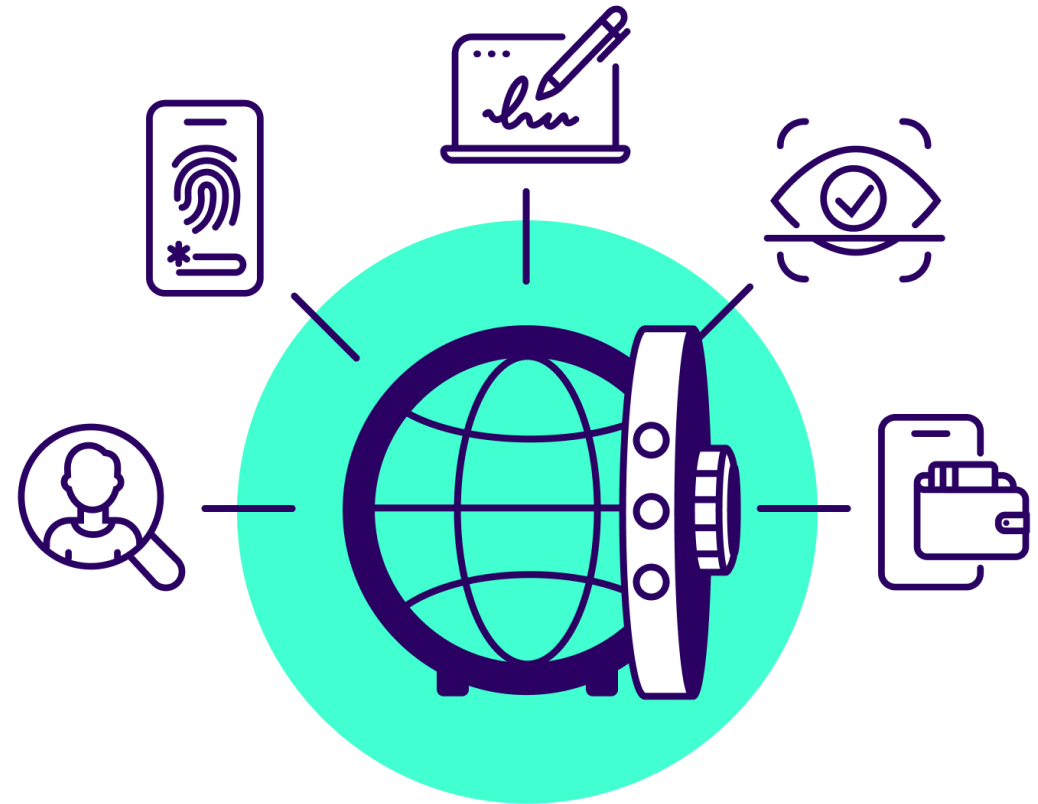


EU 2024/1624 : AMLR
EU 910/2014 : eIDAS

The vision is clear, But the reality is complex

Three challenges

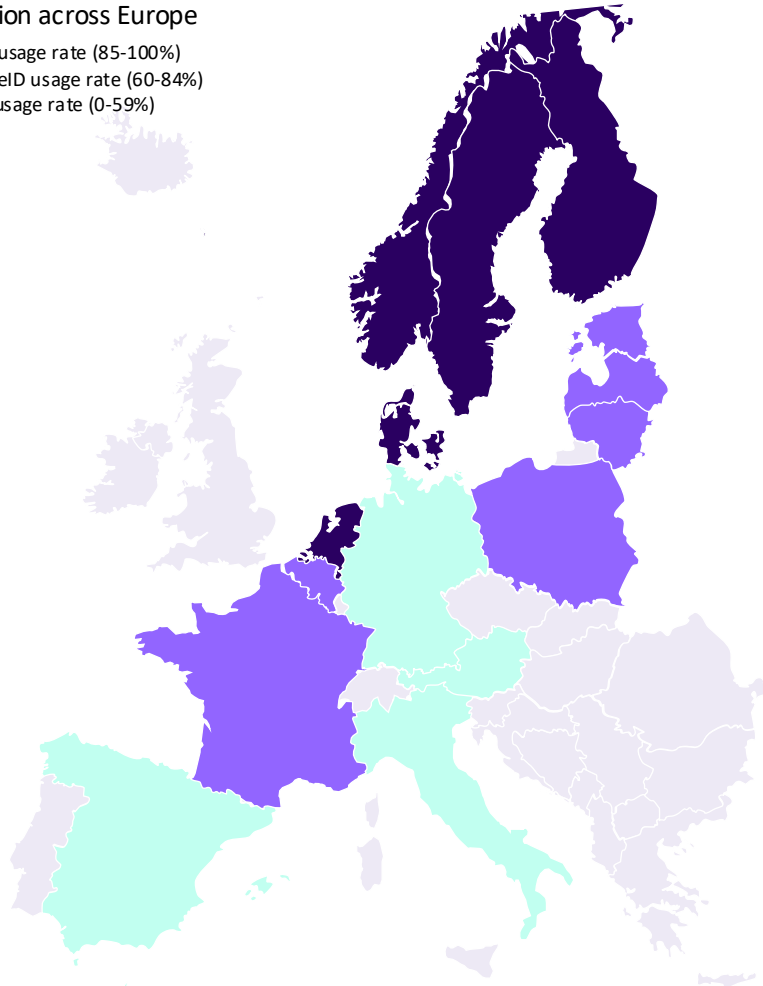
- The adoption gap
- The incentive gap
- The data gap



The adoption gap: What about countries without eIDs?

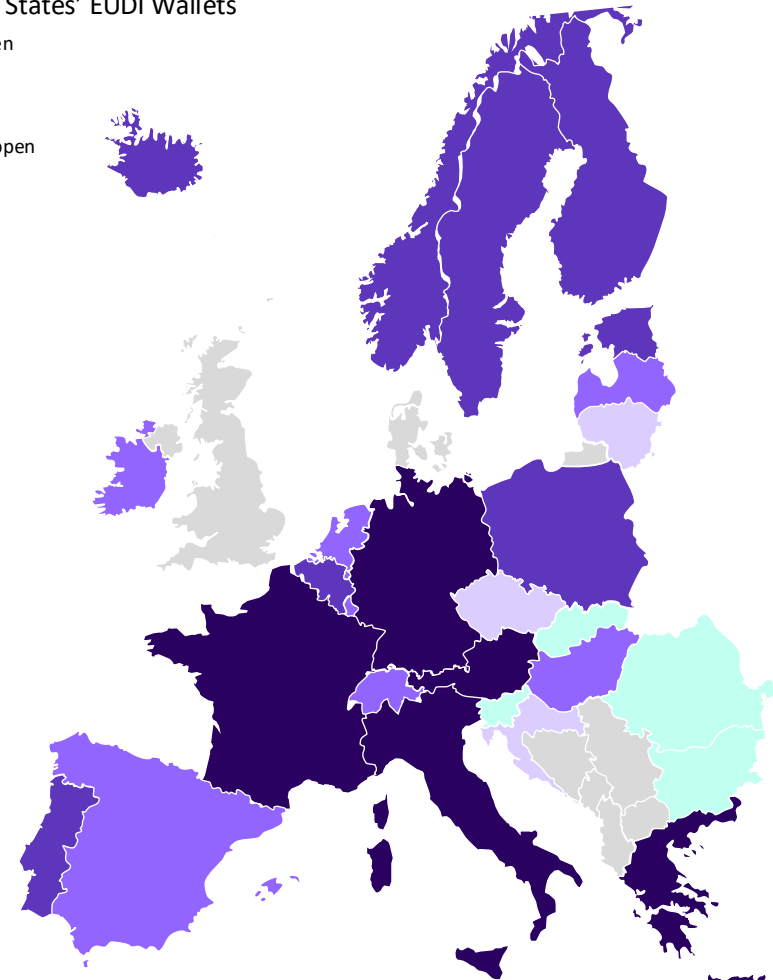
eID Adoption across Europe

- High eID usage rate (85-100%)
- Medium eID usage rate (60-84%)
- Low eID usage rate (0-59%)



Status of Member States' EUDI Wallets

- Very likely to happen
- Likely to happen
- Might happen
- Unlikely to happen
- Very unlikely to happen



The incentive gap: Why should a Swede switch?

- Swedish BankID is an example for many countries
- New national Swedish eID issued to activate the EUDI Wallet
- Will there be an incentive?
- Countries like Germany and France have much to gain



The data gap: When the eID/Wallet isn't enough

- An eID or Wallet might successfully verify a user's identity...
- ...But it may not contain all the necessary attributes for a specific high-risk AML check :
 - Address might not be available in every EUDI Wallet
 - Where should the place of birth come from?



The Last Line of Defence



eID
eIDAS notified
electronic identity



EUDI Wallet
EU & EEA
Digital Identity Wallet



QES
Qualified Electronic
Signature

Qualified Electronic Signature: Now governed by strict new identity rules

QES used for onboarding

- Requires a high level of assurance for identity verification
- Qualified certificate is issued by a Qualified Trust Service Provider
- Offers a seamless and fast onboarding process for most users

Governed by Commission Implementing Regulation (EU) 2025/1566
Aligned with technical standard: ETSI TS 119 461

High level of assurance for identity verification

- Use of passports or national identity documents
- Establish the authenticity of the used document
- Biometric verification and liveness detection



The two paths to a compliant QES

Remote verification method:

Full automated process

- Cryptographic verification of the document
- Synchronous : immediate result

Hybrid process

- Combination of automation and human verification
- Asynchronous : delayed result

3 simple steps for the highest Level of Assurance

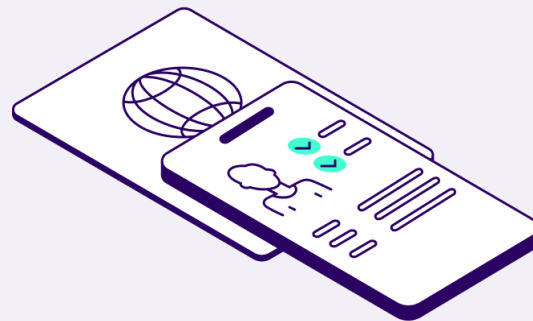
1. SCAN ID

Scan the Machine Readable Zone (MRZ) to unlock the NFC chip



2. READ CHIP

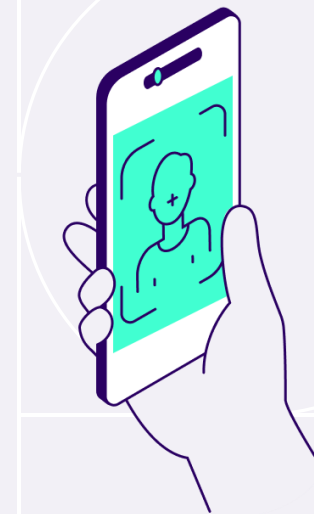
Read and verify details on the embedded chip using a smartphone's NFC capabilities



ID is authentic

3. VERIFY ID HOLDER

Optional Liveness check and biometric facial comparison with ID holder's photo on the chip



ID belongs to holder

Key Takeaways for the AML Expert



The era of AML fragmentation is over. The AMLR creates a single rulebook

- eIDAS (eIDs, Wallets and QES) is the new gold standard for CDD
- Significant adoption and data gaps will exist for years, requiring a plan B
- The QES, governed by strict new identity rules, is your ultimate, compliant safeguard



Products and services powered by Signicat's "Digital Trust Platform"

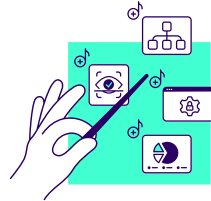


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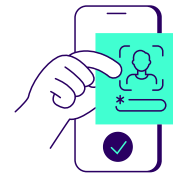
Identity Proofing



Trust Orchestration



Authentication



Signing



Digital Trust Platform (DTP)



Best-in-class cloud hosting



Banking grade security



Comprehensive resiliency suite



Highly scalable platform



EU Data storage



Full regulatory compliance

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Q&A



Edwin de Ron

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