

WHY ARE PPSN/VINs NOW REQUIRED?

A new requirement to provide a **Personal Public Service Number** (“PPSN”) or **Verified Identity Number** (“VIN”) to the **Companies Registration Office** (“CRO”) came into effect pursuant to Section 35 of the **Companies (Corporate Enforcement Authority) Act 2021** (“2021 Act”) which amended the **Companies Act 2014** (“2014 Act”), and requires the inclusion of a PPSN/VIN for all directors of Irish companies when submitting the CRO filings identified below.

The inclusion of directors’ PPSN/VINs will validate a director’s identity, highlight instances where directors are holding more directorships than permitted under the 2014 Act, and reduce the risk of identity theft.

WHEN DOES THIS REQUIREMENT COME INTO PLACE?

A director’s PPSN or VIN is required for certain CRO filings from **23 April 2023**. Therefore, companies or presenters (if applicable) need to ensure that **all** directors have either a PPSN or VIN **in advance of the next applicable filing** with the CRO and that each director’s personal information matches that held by the Department of Social Protection (“DSP”).

WHO DOES THIS REQUIREMENT APPLY TO?

This requirement applies to all Irish companies providing director information within the following CRO filings:

- **Form A1 - Incorporation of a New Company**
- **Form B1 - Annual Return**
- **Form B10 - Appointment or Resignation of a Director, or change of details**
- **Form B69 - Notice by a Director of Cessation of Office where a company has failed to file a Form B10**

(together referred to as the “Relevant CRO Filings”)

WHERE WILL MY PPSN/VIN BE STORED AND HOW WILL IT BE VERIFIED?

The CRO will retain all PPSN/VIN data provided in a secure, irreversible hashed/encrypted format. Once submitted, it will not be accessible by any member of the CRO or any other party and will never be shared with a third party.

A PPSN will be compared with the data held by the DSP. For there to be a match between the two sets of data, the forename and surname submitted to the CRO via the Relevant CRO Filing **must exactly match** the name associated with that PPSN on the DSP’s database.

If a RBO number was previously obtained for you (in conjunction with the filing of a Beneficial Ownership Register) this number will be re-classified within the CRO in advance of 23 April and can be used as the VIN.

Here at FCS Services, we are GDPR compliant and will securely retain any PPSN/VIN data provided to us with such information only being accessible and used when making Relevant CRO Filings on behalf of clients.

WHAT DOES THIS MEAN FOR ME?

- Directors’ PPSNs (or VINS once obtained/reclassified) **will need to be included on all A1’s, B1’s, B10’s and B69’s** effective 23 April 2023 onwards.
- **PPSNs will be encrypted** once submitted to the CRO to ensure security of data.
- **A verification exercise will need to be conducted** to ensure the personal information provided to the CRO matches exactly that held by the DSP or attached to a RBO number.
- If you do not already hold a PPSN/RBO number, **a VIN will need to be obtained**.
- This new requirement **should provide additional security** for directors in terms of identity and/or company theft or fraud.
- **Failure to comply** with Section 35 of the 2021 Act, and the CRO requirements associated to it, will be a **Category 4 offence** under the 2014 Act and is punishable by the imposition of a Class A fine (i.e. a fine not exceeding €5,000).

FCS Services will be engaging with all clients to assist in ensuring client companies are in a position to meet this additional filing obligation. However, if you have any queries or require assistance in advance, please contact us on info@fcscorporateservices.com or 00353 (0)91 704818