

Sahamati/Circular/Governance/2026-09/02

Dated: September 04, 2026

To,

1. FIUs,
2. AAs,
3. FIPs

Subject: Release of Fair Use Implementation Guidelines v2.0

Hello All,

We are pleased to announce that, as part of Sahamati's participatory governance efforts to promote fair and responsible use of the Account Aggregator ecosystem, we are releasing version 2.0 of Fair Use Implementation Guidelines.

1. The Guidelines are the outcome of deliberations and recommendations of the various User Councils, the Fair Use Committee, and other participatory forums facilitated by Sahamati. Version 2.0 supersedes the existing v1.x Fair Use Implementation Guidelines (Sahamati/Circular/FairUse/2025-05/01) and consolidates the applicable guidelines for FIUs, FIPs, and AAs into a single document.
2. The key change in v2.0 is the introduction of an **explicit mechanism to identify the applicable Fair Use Template via `refUri` and the Fair Use Registry**, enabling consistent validation against the declared Fair Use Templates across all participant types.
3. The key changes in version 2.0 include the following:
 - 3.1. **Fair Use Registry¹**: A new machine-readable Fair Use Registry is introduced at library.sahamati.org.in, with XML and JSON representations of the published [Fair Use Templates](#). All existing templates remain unchanged.
 - 3.2. **refUri-based Template Identification**: FIUs must pass the applicable Template ID in the Purpose refUri field to enable easier validation and improve transparency to customers.
 - 3.3. **Direct Template Visibility for FIPs**: The refUri provided by the FIU is passed through by the AA, enabling the FIP to directly identify the applicable Fair Use Template.

¹ Fair Use Registry is the machine readable format (XML and JSON) of the Fair Use Template Library and are not rules in themselves. Please refer to the v2.0 guidelines for the validation rules.

- 3.4. **Direct XML/JSON Validation:** AAs and FIPs must validate the consent attributes as per the applicable Fair Use Template against the Registry XML/JSON, eliminating the need to maintain separate internal rule databases.
- 3.5. **FI Data Range Embedded in XML/JSON** — FI Data Range rules specific to SEBI and non-SEBI entities are incorporated into the machine-readable template.
- 3.6. **Fair usage of consents raised before the release of Fair Use Templates:** FIUs are required to ensure the usage of consents raised before fair use release is within the fair use limits. AAs will validate the frequency, data range, and consent validity before servicing such consents.
- 3.7. **Single Unified Document:** The applicable requirements for FIUs, FIPs, and AAs are consolidated into a single document, replacing the three separate role-based documents.
- 4. All AAs and FIUs are required to adopt and implement the Fair Use Implementation Guidelines v2.0 by November 30, 2026.
- 5. The [Fair Use Implementation Guidelines v2.0 are available on our Github](#) for adoption and implementation. The same is published as a PDF on our website page: [Fair Use Template Library](#).

For any clarifications, please refer to our [FAQs](#); write to fairuse@sahamati.org.in.

Regards,

Sahamati Fair Use Team