Fair Use Implementation Guidelines v2.0

Driven by discussions and decisions in Committees, User Councils and Working Groups facilitated by Sahamati.

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Disclaimer

Nothing stated herein should be construed as legal advice in any manner. The views expressed in this document are based on outcomes of discussions conducted with stakeholders in relevant committee(s), user council(s) and/or working group(s) anchored by Sahamati and do not affect the requirements of any applicable provisions of law or the rules, regulations, guidelines, or circulars administered by the Reserve Bank of India, Securities and Exchange Board of India or any other relevant regulator or statutory body. You are advised to seek independent legal opinion on the applicability of any applicable laws and/or regulations relevant to your specific circumstances. .

Revision History

Version	Date	Changes Made
1.0	17th April 2025	Initial version
1.1	14th July 2025	- Update to fair use library - consent validity for CT003 and CT035
		Update to fair use rules - Corrections to omission of FI types and fields for Max Data Range Chunk, and fetch_type
1.2	10th February 2026	- Addition of new templates CT047 and CT048, and expansion to the scope of CT042 template
2.0	4th September 2026	Update to the validation logic based on passing the template ID in refUri
		Combines AA, FIU, and FIP guidelines in a single document

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Chapter I - Fair Use Framework

1. About Fair Use Framework

In response to the evolving landscape of user-consented data sharing within the Account Aggregator (AA) ecosystem, the need for a more scalable, transparent, and community-driven approach towards data collection and usage has become increasingly apparent. In view of the DPDP Act, 2023, and the increasing use of AA across the financial sector, AA market participants collectively sought the harmonisation of industry standards and practices for participation in the AA framework across the various use cases it enables. Based on such feedback, Sahamati introduced the AA Fair Use Library as a community asset to harmonise consent attributes and set upper-bound reference parameters for various use cases across regulators.

At its core, the Fair Use Library serves as a comprehensive repository of standardised fair use templates, meticulously crafted by the User Councils and Fair Use Committee to align with the diverse needs and use cases of Financial Information Users (FIUs) while ensuring they meet the business requirements and enhance customer privacy, acting as guardrails against misuse of the AA framework.

2. What is a Fair Use Template?

A Fair Use Template refers to the outer bounds for mandatory attributes (as defined by the respective user councils) of a consent artefact that can be employed for a specific use case. While a few attributes, such as purpose code, consent type, fetch type, etc., are described in absolute terms, attributes that carry a value and unit are described as upper bounds.

3. Who created the Fair Use Template Library?

The formation of the Fair Use Library involved a collaborative effort by active Financial Information Users (FIUs) within the Account Aggregator (AA) Ecosystem, through the individual User Councils, which was further reviewed and approved by the Fair Use Committee and Governing Council of Sahamati. These templates, designed as “Outer Bounds of Consent Templates,” were meticulously crafted through collaborative efforts and rigorous deliberations led by leading industry practitioners. Key considerations during the design process included safeguarding end-customer interests, ensuring alignment with the principles of the Digital Personal Data Protection (DPDP) Act, adhering to RBI master directions for AA, and addressing the specific requirements of various use cases.

4. Usage of Fair Use Template Library

The templates were developed to serve as outer bounds for data-collection practices within the AA ecosystem, providing a standardised framework that promotes transparency, fairness, and alignment with regulatory and statutory principles. Expectations are set for Financial Information Users (FIUs) and Account Aggregators (AAs) to revise their consent templates within the parameters of those in the Fair Use Template Library, ensuring consistency and adherence to established parameters. For instance, FIUs offering Spend and Investment Analytics use cases will, per the Fair Use Template Library, be expected to declare the frequency of their data pulls as 45 or fewer, with a consent validity of one year or less.

The Fair Use Library is available here on the Sahamati website.

5. Background and Context for Fair Use Implementation Rules

The Fair Use implementation rules have played a critical role in sensitising FIUs to the use of fair use templates and enabling consistent enforcement across the Account Aggregator (AA) ecosystem. Data shared by AAs indicates that Fair Use templates were adopted across FIUs, reflecting ecosystem-wide alignment and operational stability. However, as adoption has scaled and more use cases have become prevalent, certain structural limitations have emerged in the current implementation model, particularly where multiple Fair Use templates exist under the same Purpose Code.

Based on the AA Council and Fair Use Committee, it is recommended that FIUs explicitly include the Fair Use Template ID in the consent initiation request, using the `refUri` field. Consequently, this document covers Fair Use Implementation Rules v2.0, including an explicit mechanism to identify the Fair Use Template used by the FIU, with the reference provided in the `refUri` field of the consent request. This approach aligns with ReBIT expectations, which allow FIUs to provide a URL to additional information explaining the purpose or use case. The purpose refURI will indicate which Fair Use Template is being implemented by FIUs, allowing AAs and FIPs to validate against the declared template.

These rules are intended to **supersede and deprecate** the existing Version 1x of Fair Use Implementation Rules.

6. Scope of the Document

This document sets out the **Adoption Guidelines for Fair Use Implementation Rules v2.0**, including scope and entity-specific obligations for FIUs, AAs, and FIPs. Compared to v1.0, where Fair Use Guidelines were published as separate documents for FIUs, AAs, and FIPs, v2.0 consolidates them into a single unified document that provides an end-to-end view while clearly identifying the responsibilities of each participant role.

Fair Use Implementation Rules v2.0 introduce explicit identification of the use case with a combination of Purpose Code and Fair Use Template via the refUri field, enabling deterministic validation and removing ambiguity arising from multiple templates under a single Purpose Code.

Aspect	v1.0 (Previous)	v2.0 (This Document)
Document Structure	Separate documents per role plus separate rule-set files	Single unified document covering all three roles, with appendices
Template Identification	Inferred by AA via Purpose Code + wildcard matching; Template ID not shared with FIPs	FIU declares explicit Registry XML link in consent request; AA forwards to FIP as-is
Validation Method	AA maintains internal rule database; FIPs replicate AA logic independently	AA and FIP both validate directly against the XML from the Fair Use Registry
FI Data Range by FI Category	Separate rule tables for SEBI vs non-SEBI FI Types per Purpose Code	SEBI and NON-SEBI FI categories with their FI Data Range are

Aspect	v1.0 (Previous)	v2.0 (This Document)
		embedded directly in each XML template
Purpose Text	Recommended but not strictly enforced at validation layer	Expected to be present for all templates
Template Discovery	Templates available on website but no machine-readable links	Fair Use Registry introduced at library.sahamati.org.in; XML and JSON Link columns added to the Library table

These guidelines are issued to ensure uniform adoption, orderly transition, and predictable enforcement across the AA ecosystem.

Chapter II - Fair Use Registry

7. Fair Use Registry in XML and JSON Structure

Every Fair Use Template published by Sahamati is available as a machine-readable XML document (and an equivalent JSON document) hosted on Sahamati's Library for Fair Use (Fair Use Registry - FUR). The FUR is the machine-readable counterpart to the Fair Use Template Library page on the Sahamati website. While the Library (https://sahamati.org.in/aa-fair-use-template-library/) is the human-readable reference, the Registry hosted at library.sahamati.org.in serves as the single source of truth for automated validation of consent parameters.

7.1. Canonical URL Format

To support this, every template in the Registry is addressed using a canonical URL format — a single, predictable path that uniquely identifies a template by its purpose code, template ID, and version, so ecosystem participants and automated systems can resolve the correct document deterministically rather than relying on a lookup or search step.

https://library.sahamati.org.in/{environment}/fairuse/purpose/{purpose_code}/template/{template_id}/version/{version}.xml

where,

- environment: either UAT or PROD to reflect the testing and production environment
- purpose_code: The ReBIT-specified Purpose Code (e.g., 101, 102, 103, 104, 105)
- template_id: The Sahamati Fair Use Template ID (e.g., CT001, CT003, CT004).
- version: The version number of the template (e.g., 1.0, 2.0).

A JSON equivalent is available at the same path with a .json extension.

7.2. XML Structure

Each Fair Use Registry page XML follows a defined structure. The XML must be used only as a validation reference layer, not a modification of, or substitute for, the ReBIT-defined consent artefact. This structure is modelled on the consent artefact as designed by ReBIT Specifications. Any additional elements appearing in this XML that are not part of the ReBIT consent artefact specification are included solely to enable FIUs, AAs, and FIPs to set validation rules against the attributes of a consent request and the respective Fair Use Template's upper bounds. In no way does Sahamati intend or recommend any change to the consent artefact structure as defined by the ReBIT specification.

The key elements are given in the Table 1 below:

Table 1: Fair Use Template XML Structure			
Attributes		**Format**	**Description**
fairUseTemplate (root)		element	Root element wrapping the entire template.
	templateId	string	The unique identifier for this Fair Use Template (e.g., CT001, CT003).
	version	decimal	Version number of the template.
	effectiveDate	Date (YYYY-MM-DD)	The date from which this template version is effective and can be referenced in consent requests.
	endDate	Date (YYYY-MM-DD) or Blank	Blank for Active templates. Populated only when the template status is “Soon to be Deprecated” or “Deprecated”, indicating the date after which this template should no longer be used.
	templateStatus	enum: ACTIVE, SOON_TO_BE_DEPRECATED, DEPRECATED	One of three values: Active (currently in use), Soon to be Deprecated (will be retired, endDate indicates when), or Deprecated (no longer valid for new consent requests).
	templateName	string	A human-readable name for the use case (e.g., "Loan Underwriting", "Wealth Management Services").
	templateDetail	string	Container for all consent parameters governing this template.
		fetchType	Enum: ONETIME, PERIODIC	Defines how data may be fetched under this template.
		consentTypes	array of enum: PROFILE, SUMMARY, TRANSACTIONS	The types of FI data the consent covers (e.g., PROFILE, SUMMARY, TRANSACTIONS). A template may list more than one.
		purpose	element	Container for the four parameters that make up the Purpose element as defined in ReBIT's consent artefact structure — code, refUri, text, and category.
		purpose > code	integer (3-digit)	The ReBIT Purpose Code (e.g., 101, 102, 103, 104, 105).
		purpose > text	string	The Purpose Text to be displayed to the customer. This is the agreed ecosystem text for the use case. FIUs must display the exact purpose text as provided in the template to ensure uniform customer communication across the ecosystem. No customisation is allowed, as this text is designed to build trust and clarity.
		purpose > refUri[1]	string	Reference to the XML page that has further information about the purpose
		purpose > category	string	Broad classification of the purpose (e.g., "Financial Reporting", "Personal Finance"), as defined by ReBIT at https://api.rebit.org.in/purpose. Must align with ReBIT classification as per purpose code
		fiCategory (SEBI / NON-SEBI)	element, name attribute: SEBI, NON-SEBI	Each template defines FI Types grouped into SEBI and NON-SEBI categories, each with its own FIDataRange upper bound. This replaces the separate FI Request rule tables from v1.0.

[1] *Note: This refUri (within the FIU's consent request, Purpose block) is distinct from the refUri documented in of the Fair Use Template XML structure, which instead references ReBIT's purpose code definition. Both share the same field name per the ReBIT consent artefact structure, but FIU is expected to pass Canonical URL Format in the consent requests.*

| Table 1: Fair Use Template XML Structure | | |

8. Fair Use Registry URL Links

The XML is hosted on the public Fair Use Registry and is accessible to anyone, including customers and the public, ensuring full transparency of the agreed upper bounds for each use case. The complete list of canonical URLs for every published Fair Use Template is provided in Annexure 1.

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Chapter III - Fair Use Implementation Rules for FIUs

As a participatory governance initiative, FIUs are expected to implement the Fair Use templates as agreed upon by the ecosystem for their respective use cases. The parameters of the individual Fair Use Templates in the Fair Use Template Library represent upper bounds for the respective use cases, as decided by the relevant User Councils. Participants should treat the parameters in the Fair Use templates as outer limits and not construe them as legal advice in any manner. Participants are encouraged to review their use case(s) and ensure compliance with applicable laws, including the RBI Master Directions on NBFC-AA and the DPDP Act.

Sahamati will publish additional Fair Use Templates as the AA ecosystem evolves, informed by discussions in the relevant User Councils and the Fair Use Committee. Existing Fair Use templates may also be revised in light of market evolution, and/or statutory or regulatory guidance, including the DPDP Act and the Rules issued thereunder.

9. Guidelines to FIUs on Consent Creation as per fair use templates:

Guidelines for the adoption of the fair use templates remain unchanged from v1.0, except for the introduction of the purpose refUri field and its usage.

9.1. **General Responsibility for Fitment:** The mere existence or publication of a Fair Use Template in the Registry does not automatically grant an FIU the right to use it. FIUs must ensure alignment between their regulatory charter, the selected use case, and the declared Fair Use Template.

9.2. **Use Case Description:** This describes the specific financial service or context for which the data is being accessed. FIUs must align their consent purpose with this use case and avoid using any template for unrelated use cases.

9.3. **Purpose Text**: FIUs should reference the purpose text in the Fair Use Template to ensure consistent, clear customer communication across the ecosystem. The intent and meaning of the template's purpose text must not be altered. FIUs may enhance the purpose text to provide additional information relevant to their use case (such as product details), provided such enhancements do not change the underlying use case or bundle multiple use cases within a single template.

9.4. **Purpose Code**: FIUs must use the purpose code as is in the template. This should map to the ReBIT-specified purpose codes and is used for backend classification of consent and rule setting at AA and FIPs.

9.5. **Purpose refUri:** FIUs must ensure they pass the Fair Use Template ID in the given canonical URL format (7.1 above), referencing the specific Fair Use Template they are using for the consent request. FIUs must further ensure that all parameters in the consent are strictly aligned with what is published in the referenced template. Any deviation from the published template's parameters, even if the template is correctly referenced, would constitute a fair use deviation.

9.6. **Consent Type**: This defines which components of the data packet are to be accessed – Profile, Summary/Holdings, and/or Transactions. FIUs must restrict data requests to only the

consent types mentioned in the template. Requesting more components than specified would be flagged as a deviation.

9.7. **Fetch Type:** This specifies how the data is accessed - Onetime or Periodic. FIUs must configure their consent and FI request logic accordingly. A template that supports only one-time fetch must not be used for recurring access and vice versa.

9.8. **Frequency**: This indicates the maximum allowed number of data pulls during the validity period, based on the unit of time (day, month, or year) decided by the User Councils and the Fair Use Committee. FIUs must ensure that data fetches across the validity period do not exceed the defined ceiling for the specified unit as prescribed in the template, and that their data fetch frequency adheres to the data minimisation principles under the DPDP Act. FIUs are advised to use calendar-based intervals only (e.g., calendar day/month/year), not rolling or dynamic intervals.

Example: A template with frequency set as "45 per month" must not be interpreted as "1.5 per day." The FIU must ensure that the number of data pulls in any calendar month does not exceed 45.

9.9. **Validity Period**: This indicates how long the consent is valid (e.g., 6 months, 1 year). As per ReBIT specifications, FIUs must display both Consent Start Date and Expiry Date to the user. FIUs are expected to ensure the validity duration does not exceed the maximum allowed in the template.

9.10. **Maximum FI Data Range**: This defines the maximum span of historical data that can be requested in a single FI request. FIUs must:

9.10.1. Display a consent window to the user that does not exceed the time from consent start to consent expiry minus the FI data range. (Consent Request API)

9.10.2. Limit the data request window to this range. (FI/Request API)

Example - Consent Start Date: 7th June 2025, Consent Expiry Date: 7th June 2026, Maximum FI Data Range as per Template: 6 months

In this case, the FIU can fetch up to 6 months of data at once in an FI Data Request. On 15th June 2025, it can pull statements from 15th December 2024 to 15th June 2025.

FI Data Range in Consent Request: 7th December 2023 to 7th June 2025.

9.11. **Data Life**: This is defined in ReBIT as "for how long the FIU/AA Client stores the data". FIUs must not confuse this with data storage - that requires data to be archived as per the storage requirements under their regulations. This is the time period available for the FIU to process the data for the consented purpose, post which it is archived or purged, based on regulatory requirements, and not available for processing again. FIUs are expected to "delete" or "purge" the data after the data life window expires unless any applicable law or regulation requires archival thereof.

9.12. **One Active Consent Per Template Per FIU**: An FIU must not seek more than one active consent for the same account information, under the same Purpose Code and Fair Use

Template, at the same time (except in the case of CT001, CT003, CT035, which may result from multiple loans granted to the same customer by the same FIU). Where an active consent already exists covering the same accounts under the same Purpose Code, the FIU must not request an additional consent for those accounts. Once the current active consent expires, the FIU may request the customer to provide a fresh consent for continuity of service.

10. Declaration of Fair Use Template to Customer and All Participants

10.1. As mentioned above, the FIU must use the applicable use case in the form of the Fair Use Template ID by including the Fair Use Registry XML link in the refUri field of the Purpose block within the consent request payload.

10.2. Template ID will be declared to the AA, and through the AA to the FIP, removing the need for inference-based matching. It is passed through to the FIP, giving the FIP direct visibility into the declared use case and template.

10.3. **Maintaining Consistency in Template Declaration:** To maintain consistency across the ecosystem, FIUs are requested to:

10.3.1. **Version Pinning**: Reference the exact version of the template in the Registry URL. If Sahamati publishes a revised version, FIUs should migrate within the transition period communicated by Sahamati.

10.3.2. **No Tampering**: The FIU should not host, proxy, cache, or modify the XML. The link should always point to the canonical Fair Use Registry at library.sahamati.org.in. Any request pointing to a different domain will be rejected by the AA.

10.3.3. **Template Alignment**: The FIU should select the correct Fair Use Template for its use case. Using a template designated for a different use case is a deviation and a ground for rejection.

10.3.4. **Declaration of Fair Use Template to Sahamati:** During the onboarding of an entity into Sahamati's central registry, each FIU must declare their use case to Sahamati via the required forms.

11. Guidelines to FIUs on Data requests as per fair use templates:

11.1. **Consents Created Under Fair Use Limits:** FIUs must fetch data strictly as per the parameters of the relevant consent artefact.

11.2. **Consents Created Prior to Fair Use Adoption:**

11.2.1. FIUs must not rely on such consents merely because they remain technically valid.

11.2.2. FIUs must retire pre-existing consents by the earlier of (a) the consent's own original expiry date, or (b) the Maximum Consent Validity prescribed below for the applicable purpose code, calculated from the date of v2.0 rollout. FIUs must obtain a fresh, Fair-Use-conforming consent to continue servicing the customer beyond this date.

11.2.3. Data must not be fetched at a frequency exceeding the Maximum Frequency prescribed below, regardless of what the original consent permits.

11.2.4. Non-conforming requests are liable to rejection. FIPs may independently enforce these limits at their end.

Table 2: Maximum data request fair use limits by purpose codes			
Purpose Code	**Maximum FI Range**	**Maximum Consent Validity**	**Maximum Frequency**
101 – Wealth Management	Limits set by FIPs for SEBI FI Types 13 months for other FI Types	1 Year	31/month
102 – Personal Finance Management	Limits set by FIPs for SEBI FI Types 13 months for other FI Types	1 Year	45/month
103 – Loan Underwriting	12 months	45 days	1 (One-time)
104 – Loan Monitoring	1 day for summary-only consents 6 months for summary, profile, transactions	8 years for summary-only consents, 5 years for summary, profile, transactions)	1 / day (Summary only) / 25/month (Summary, Profile, Transactions)
105 – Account Verification / Customer Verification	12 months	1 month	1 (One-time)

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Chapter IV - Fair Use Implementation Rules for AAs

AAs are the primary enforcers of Fair Use within the ecosystem. In v2.0, the AA validation model shifts from inference-based rule matching to direct XML-based template validation using the Fair Use Registry. AAs must ensure that all consent requests and FI requests fall within the upper bounds set in the Fair Use Templates.

12. Guidelines to AAs Consent Request Validation

For every consent creation request received from FIU, the AA must:

12.1. **Extract Template Link:** On receiving a consent request, extract the refUri field from the Purpose block.

12.2. **Validate URL Format:** Verify the URL conforms to the canonical Fair Use Registry pattern at library.sahamati.org.in. Reject any request pointing to a different domain or a malformed URL. (Refer to the validation rules table below)

12.3. **Fetch and Parse XML/JSON:** Fetch the XML/JSON from the Registry (caching of XML/JSON is permitted with a maximum TTL of 24 hours). Parse to extract the template attributes and upper-bound parameters.

12.4. **Parameter-by-Parameter Validation:** Compare every consent parameter against the corresponding upper bound in the XML/JSON. If any parameter exceeds the bound, reject the request.

12.5. **Purpose Text Validation:** Validate that Purpose Text is populated and non-empty. For finalised templates, the AA should verify that the Purpose Text is semantically consistent with the Purpose Text prescribed in the template, and flag any material deviation for appropriate action.

12.6. **Pass-Through of Purpose refUri:** The AA must not edit or modify the refUri in any way. It is a pass-through attribute, similar to other attributes in the consent request. The FIP must receive the identical Registry URL that the FIU originally provided.

12.7. **Validation Rules for Consent Request received from FIUs:** AAs must validate each attribute in the following manner:

Table 3: Consent Request and Consent Artefact Validation rules

Sl. no.	Parameter	Validation Rule
1	**Purpose refUri**	i) Must be a well-formed URL matching the canonical Fair Use Registry pattern at library.sahamati.org.in. ii) Must resolve to a templateId and version that are actually published and active in the Registry. Requests with a malformed URL, a URL pointing to a different domain, or a reference to a non-existent/deprecated template must be rejected before any further parameter validation is performed.

Table 3: Consent Request and Consent Artefact Validation rules		
Sl. no.	**Parameter**	**Validation Rule**
2.	**Purpose Code**	Must match the purpose code in the XML URL path and the Purpose > code element in the template.
3.	**Purpose Text**	i) Must be non-empty. ii) Should be semantically consistent with the template's Purpose Text. iii) Purpose Text can include additional details such as loan product name, etc.; however, the intent cannot be modified.
4.	**Fetch Type**	Must match the fetchType in the template (ONETIME or PERIODIC).
5.	**Consent Expiry**	Duration from consentStart to consentExpiry must not exceed consentExpiry > max in the template.
6.	**Frequency**	i) Must match the unit of frequency as per the template. ii) Value must not exceed the template ceiling.
7.	**Data Life**	Duration of data life must not exceed the DataLife > max value in the template.
8.	**FI Types**	All requested FI Types must exist within the FICategory sections of the template.
9.	**Consent Types**	All requested types (PROFILE, SUMMARY, TRANSACTIONS) must be within the consentTypes in the template.
10.	**FI Types**	i) Each requested FI Type must exist within one of the fiCategory (SEBI or NON-SEBI) blocks declared in the template. ii) The AA must identify which fiCategory the requested FI Type belongs to as part of this check, this determines the applicable FI Data Range ceiling below.
11.	**FI Data Range**	i) For each requested FI Type, having identified its applicable fiCategory (SEBI or NON-SEBI) under the FI Types check above, the FI Data Range declared in the consent request (start to end) must not exceed the sum of the consent's validity duration and fiCategory > fiDataRange > max for that category in the template, i.e., the at time of consent creation, FI data range must span from (consent start minus max data range) to consent expiry. *Note: At the time of an actual data pull from FI Request, the data window requested must not itself exceed fiCategory > fiDataRange > max for that category, measured back from the pull date.*

12.8. **Error Codes and Messages for Deviant Consent Request received from FIUs:** AAs must return standardised responses when a consent request does not fall within the agreed Fair Use upper bounds. The HTTP status code 412 – Precondition Failed must be used. These error codes are unchanged from v1.0. The {Attribute name} placeholder may be replaced with the specific parameter (e.g., Purpose, Frequency, Data Range). AAs may choose whether or not to include specific deviation details in the error message. The level of detail is left to

the discretion of the AA, with the intent of assisting FIUs in identifying and correcting requests that exceed the upper bounds.

Table 4: Error Responses			
Scenario	**Response Code**	**Error Code**	**Error Message**
Missing, incomplete or invalid template link in refUri field	412	PreconditionFailed	Consent request rejected: Fair Use XML link in refUri is incorrect.
Any deviation in attributes in consent request/artefact	412	PreconditionFailed	Consent parameters are not as per fair use policy {Attribute name} is invalid.
Any deviation in attributes in consent request/artefact	412	PreconditionFailed	FI data range is not as per fair use policy.

12.9. **Duplicate Active Consent Check:** The AA must not allow a new consent request where an active consent already exists for the same FIU, Purpose Code, Fair Use Template, and account(s). Such a request must be rejected until the existing active consent expires. (except in the case of CT001, CT003, CT035, which may result from multiple loans granted to the same customer by the same FIU).

13. Guidelines to AAs for FI Request Validation for fair use templates

For every FI Request (data fetch), the AA must validate:

13.1. **Frequency:** Calendar-based time intervals only, e.g., if a "45 per month" consent is raised on 15th July, the 45 limit applies to the entire calendar month, and the counter resets to 0 at the start of each new month. Similarly, for "1 per day," the counter cannot start before the consent start date; only 1 data pull is allowed that day. This applies to all consents irrespective of the frequency given in the consent artefact.

13.2. **FI Data Range against FI Category**: The FI Data Range in the FI Request must not exceed the FIDataRange > max for the applicable FICategory in the template XML.

13.2.1. If the request includes SEBI FI Types, the SEBI category's limit applies. If it includes NON-SEBI FI Types, the NON-SEBI category's limit applies.

13.2.2. If a single FI Request includes both SEBI and NON-SEBI FI Types, the AA should apply the stricter (lower) of the two FI Data Range limits.

13.2.3. If an FI Request exceeds the fair use data range it must be rejected

13.3. **Consents Created as per Fair Use Templates:** AAs validate data requests against such consents strictly in accordance with the parameters of the consent artefact, which are well within fair use limits.

13.4. **Consents Created Prior to Fair Use Adoption:** Where the FI Request is made under a consent that was created prior to adoption of Fair Use templates and hence their attributes are not in accordance with Fair Use limits, the AA must validate the request against the outer limits prescribed in Table 2 for the applicable purpose code:

13.4.1. The FI Request must not be made under a consent whose remaining validity extends beyond the earlier of (a) its own original expiry, or (b) the Maximum Consent Validity in Table 2, calculated from the date of v2.0 rollout.

13.4.2. The frequency of data pulls must not exceed the Maximum Frequency in Table 2.

13.4.3. The FI Data Range must not exceed the Maximum FI Range in Table 2.

13.4.4. Any FI Request that does not conform to these Table 2 limits must be rejected.

14. Auditing and Reporting

14.1. AAs should log and report Fair Use validation failures with clear error codes and messages indicating:

14.1.1. Template ID

14.1.2. Version

14.1.3. Attribute(s) in violation

14.2. AAs may use the template reference for reporting, analytics, and ecosystem-level monitoring.

Chapter V - Fair Use Implementation Rules for FIPs (Recommended)

Being the custodians of customer data integrity and security, FIPs have reserved the right to act as second checkers of incoming Consent Requests and FI Requests. While AAs serve as the primary enforcers, FIPs may deploy their own validation. In case FIPs wish to do so, under v2.0, they no longer need to infer the template. They receive the explicit Fair Use Registry XML link from the AA as part of the consent artefact.

15. Guidelines to FIPs for Consent Validation for Fair Use Templates

15.1. **Acknowledgement of Consent Artefact:** Upon receiving the signed consent artefact copy shared by the AA via the Consent Notification API, the FIP must acknowledge it, except where the FIP identifies a Fair Use deviation. The FIP must not withhold acknowledgement for any reason unrelated to a Fair Use deviation.

15.2. **Template Validation (Recommended):** Where a FIP chooses to validate the consent artefact, it should extract the templateId from the refUri in the Purpose block and validate the consent artefact's parameters against the corresponding Fair Use Template, in the manner prescribed in Table 3.

15.3. **Deviation Handling:** Where the FIP identifies a deviation from the Fair Use Template's prescribed limits, it may decline to acknowledge the consent artefact, citing the relevant deviation.

15.4. **Error Codes:** Where a FIP declines to acknowledge a consent artefact under this section, it must use the error codes prescribed in Table 4.

16. Guidelines to FIPs for FI Request Validation for Fair Use Templates

16.1. **Consents Created Under Fair Use Limits:** Where a FIP chooses to validate FI Requests received from the AA, it should do so against the parameters of the applicable Fair Use Template, as set out in Table 3.

16.2. **Consents Created Prior to Fair Use Adoption:** The FIP must not reject an FI Request received from the AA for a consent created prior to Fair Use adoption, provided the request conforms to the outer limits prescribed in Table 2 for the applicable purpose code.

16.3. **Error Codes:** FIPs must provide deterministic rejection responses when validation fails, clearly indicating the error, using the error codes prescribed in Table 4.

Chapter VI - Fair Use Template Library and Registry - Discovery and Access

17. Fair Use Template Library Web Page

17.1. **Access:** All published Fair Use Templates are listed in the Fair Use Template Library on the Sahamati website at: https://sahamati.org.in/aa-fair-use-template-library/. This page contains the master table listing every Fair Use Template finalised by the User Councils and Fair Use Committee. The Library table now includes two new columns, XML Link and JSON Link, pointing to the corresponding entries in the Fair Use Registry at library.sahamati.org.in. FIUs, AAs, and FIPs can directly copy the correct Registry URL for their use case from this table.

17.2. **How to Discover the Correct Template URL:**

17.2.1. **Visit** the Fair Use Template Library: Navigate to https://sahamati.org.in/aa-fair-use-template-library/

17.2.2. **Identify Your Use Case**: Locate the row matching your Purpose Code and use case description. For Purpose Codes with multiple templates (e.g., 104 with Loan Monitoring and Loan Monitoring for Collections), select the correct one.

17.2.3. **Copy the XML Link**: Use the XML link from the corresponding column. Place it in the refUri field of the consent request. It must be XML and not JSON.

17.2.4. **Optionally Use JSON**: If your internal systems prefer JSON for rule-engine integration, use the JSON link for programmatic access (but not inside the purpose block).

17.3. **Programmatic Access to the Fair Use Registry**

17.3.1. FIUs, AAs, and FIPs should not pull the Fair Use Registry URLs more than once per 24-hour period. Templates change only when the Fair Use Committee finalises revisions. Excessive pulling creates unnecessary traffic and may result in rate-limiting.

17.3.2. Cache XMLs / JSONs locally in your validation engine for the next 24 hours.

17.3.3. Use the cached version for all real-time consent request validations during the day. On the next pull, compare with the cached version. If changed (version incremented, parameters updated), update the cache and log for audit.

17.3.4. Do NOT fetch the XML/JSON on every incoming consent request. This is unnecessary and generates excessive traffic.

17.4. **Availability and Support:** The Fair Use Registry XML and JSON endpoints at library.sahamati.org.in are designed to be available 24 hours a day, 7 days a week. In the event of unavailability:

17.4.1. Use cached version: If you followed the daily-pull approach, validate against the cached copy until the endpoint is restored.

17.4.2. Do not reject due to outage: Consent requests should not be rejected because of a temporary Registry outage if a cached copy is available.

17.4.3. Report the issue: If the Registry endpoints are unreachable or returning errors, contact Sahamati promptly at techsupport@sahamati.org.in, cc'ing fairuse@sahamati.org.in, include:

the exact URL that failed, the HTTP status code or error received, the timestamp, and your entity ID. Sahamati will acknowledge and work to resolve on priority.

Annexures

1. Fair Use Template Library with Fair Use Registry Links

The table below is the complete Fair Use Template Library as published at https://sahamati.org.in/aa-fair-use-template-library/, with two new columns pointing to the Fair Use Registry (XML Link and JSON Link) at library.sahamati.org.in. Participants should always refer to the website for the latest updates. Last published: 31st December 2025.

Table 5: Fair Use Registry Links								
Sl.	**Template ID**	**Version**	**Purpose Code**	**Use Case Category**	**Status**	**Purpose Text**	XML URL	JSON URL
1	**CT001**	1.0	103	Loan Underwriting	Active	To process borrower's (loan / credit card / credit line) application	https://library.sahamati.org.in/PROD/fairuse/purpose/103/template/CT001/version/1.0.xml	https://library.sahamati.org.in/PROD/fairuse/purpose/103/template/CT001/version/1.0.json
2	**CT003**	1.1	104	Loan Monitoring	Active	To monitor the borrower's account to verify the repayment capability, subject to activation of (loan / credit card / credit line)	https://library.sahamati.org.in/PROD/fairuse/purpose/104/template/CT003/version/1.1.xml	https://library.sahamati.org.in/PROD/fairuse/purpose/104/template/CT003/version/1.1.json
3	**CT004**	1.0	101	Wealth Management Services	Active	To provide (Wealth Management) / (Advisory) Services	https://library.sahamati.org.in/PROD/fairuse/purpose/101/template/CT004/version/1.0.xml	https://library.sahamati.org.in/PROD/fairuse/purpose/101/template/CT004/version/1.0.json
4	**CT006**	1.0	103	Income Verification for Insurance Underwriting	Active	To verify the income as or on behalf of the insurer selected by the customer while underwriting a Life insurance policy	https://library.sahamati.org.in/PROD/fairuse/purpose/103/template/CT006/version/1.0.xml	https://library.sahamati.org.in/PROD/fairuse/purpose/103/template/CT006/version/1.0.json

Table 5: Fair Use Registry Links								
Sl.	**Template ID**	**Version**	**Purpose Code**	**Use Case Category**	**Status**	**Purpose Text**	XML URL	JSON URL
5	**CT008**	1.0	102	Personal Finance Management	Active	To generate insights based on your overall finances and provide incidental recommendations, if any	https://library.sahamati.org.in/PROD/fairuse/purpose/102/template/CT008/version/1.0.xml	https://library.sahamati.org.in/PROD/fairuse/purpose/102/template/CT008/version/1.0.json
6	**CT010**	1.0	105	FNO Services Onboarding	Active	To assess genuineness and financial soundness of the customer for FNO services activation	https://library.sahamati.org.in/PROD/fairuse/purpose/105/template/CT010/version/1.0.xml	https://library.sahamati.org.in/PROD/fairuse/purpose/105/template/CT010/version/1.0.json
7	**CT019**	1.0	102	Self Use consent on AA Apps	Active	To analyze and generate insights on your financial data for your personal use, presented through an analytics dashboard on the Account Aggregator app	https://library.sahamati.org.in/PROD/fairuse/purpose/102/template/CT019/version/1.0.xml	https://library.sahamati.org.in/PROD/fairuse/purpose/102/template/CT019/version/1.0.json
8	**CT035**	1.1	104	Loan Monitoring for Collections	Active	To monitor a borrower's accounts for (loan / credit card / credit line) collection, in case of overdue payments	https://library.sahamati.org.in/PROD/fairuse/purpose/104/template/CT035/version/1.1.xml	https://library.sahamati.org.in/PROD/fairuse/purpose/104/template/CT035/version/1.1.json
9	**CT040**	1.0	105	Financial Account Verification	Active	To verify (financial account type) account details for (activity/product)	https://library.sahamati.org.in/PROD/fairuse/purpose/105/template/CT040/version/1.0.xml	https://library.sahamati.org.in/PROD/fairuse/purpose/105/template/CT040/version/1.0.json
10	**CT042**	1.1	104	Counterparty Risk Monitoring	Active	To monitor the counterparty risks of Recovery Agents / Sourcing Partners / Employees	https://library.sahamati.org.in/PROD/fairuse/purpose/104/template/CT042/version/1.1.xml	https://library.sahamati.org.in/PROD/fairuse/purpose/104/template/CT042/version/1.1.json
11	**CT043**	1.0	104	Compliance Reporting of Employees	Active	To enable regulatory and internal compliance reporting of investment by employees and associated persons	https://library.sahamati.org.in/PROD/fairuse/purpose/104/template/CT043/version/1.0.xml	https://library.sahamati.org.in/PROD/fairuse/purpose/104/template/CT043/version/1.0.json
12	**CT045**	1.0	105	Onetime Verification of Financial Condition	Active	Verification of financial condition of (Employees, Vendors and other third parties)	https://library.sahamati.org.in/PROD/fairuse/purpose/105/template/CT045/version/1.0.xml	https://library.sahamati.org.in/PROD/fairuse/purpose/105/template/CT045/version/1.0.json

Table 5: Fair Use Registry Links								
Sl.	**Template ID**	**Version**	**Purpose Code**	**Use Case Category**	**Status**	**Purpose Text**	XML URL	JSON URL
13	**CT046**	1.0	104	Government Scheme Beneficiary Monitoring	Active	To measure the efficacy and impact of government schemes	https://library.sahamati.org.in/PROD/fairuse/purpose/104/template/CT046/version/1.0.xml	https://library.sahamati.org.in/PROD/fairuse/purpose/104/template/CT046/version/1.0.json
14	**CT047**	1.0	104	Monitoring by Credit Rating Agency	Active	To analyse the financials to assign and review the credit rating periodically	https://library.sahamati.org.in/PROD/fairuse/purpose/104/template/CT047/version/1.0.xml	https://library.sahamati.org.in/PROD/fairuse/purpose/104/template/CT047/version/1.0.json
15	**CT048**	1.0	103	Priority Sector Loan Underwriting	Active	To process borrowers' Loan Application for Priority Sector loans or housing loan under IBA scheme for EWS, LIG and MIG categories	https://library.sahamati.org.in/PROD/fairuse/purpose/103/template/CT048/version/1.0.xml	https://library.sahamati.org.in/PROD/fairuse/purpose/103/template/CT048/version/1.0.json

Table 6: Sample XML

CT001 - v1.0 URL: https://library.sahamati.org.in/UAT/fairuse/purpose/103/template/CT001/version/1.0.xml

```
<fairUseTemplate templateId="CT001" version="1.0" effectiveDate="2024-05-31" templateStatus="ACTIVE" templateName="Loan Underwriting">
<templateDetail>
<fetchType>ONETIME</fetchType>
<consentTypes>
<consentType>PROFILE</consentType>
<consentType>SUMMARY</consentType>
<consentType>TRANSACTIONS</consentType>
</consentTypes>
<purpose>
<code>103</code>
<refUri>https://api.rebit.org.in/aa/purpose/103.xml</refUri>
<text>To process borrower's (loan / credit card / credit line) application</text>
<category>Financial Reporting</category>
</purpose>
<fiCategories>
<fiCategory name="SEBI">
<fiTypes>
<fiType>SIP</fiType>
<fiType>EQUITIES</fiType>
<fiType>MUTUAL_FUNDS</fiType>
<fiType>ETF</fiType>
<fiType>IDR</fiType>
<fiType>CIS</fiType>
<fiType>AIF</fiType>
<fiType>INVIT</fiType>
<fiType>REIT</fiType>
</fiTypes>
<fiDataRange>
<unit>MONTH</unit>
<value max="14"/>
</fiDataRange>
</fiCategory>
<fiCategory name="NON-SEBI">
<fiTypes>
<fiType>DEPOSIT</fiType>
<fiType>TERM_DEPOSIT</fiType>
<fiType>RECURRING_DEPOSIT</fiType>
<fiType>INSURANCE_POLICIES</fiType>
<fiType>LIFE_INSURANCE</fiType>
<fiType>GENERAL_INSURANCE</fiType>
<fiType>NPS</fiType>
<fiType>GSTR1_3B</fiType>
</fiTypes>
<fiDataRange>
<unit>MONTH</unit>
<value max="14"/>
</fiDataRange>
</fiCategory>
</fiCategories>
<frequency/>
<dataLife>
<unit>MONTH</unit>
<value max="1"/>
</dataLife>
<consentExpiry>
<unit>MONTH</unit>
<value max="1"/>
</consentExpiry>
</templateDetail>
</fairUseTemplate>
```

Table 7: Sample JSON

CT001 - v1.0 URL: https://library.sahamati.org.in/UAT/fairuse/purpose/103/template/CT001/version/1.0.json


```
{
  "fairUseTemplate": {
    "templateId": "CT001",
    "version": "1.0",
    "effectiveDate": "2024-05-31",
    "templateStatus": "ACTIVE",
    "templateName": "Loan Underwriting",
    "templateDetail": {
      "fetchType": "ONETIME",
      "consentTypes": [
        "PROFILE",
        "SUMMARY",
        "TRANSACTIONS"
      ],
      "purpose": {
        "code": "103",
        "refUri": "https://api.rebit.org.in/aa/purpose/103.xml",
        "text": "To process borrower's (loan / credit card / credit line) application",
        "category": "Financial Reporting"
      },
      "flCategories": [
        {
          "name": "SEBI",
          "fiTypes": [
            "SIP",
            "EQUITIES",
            "MUTUAL_FUNDS",
            "ETF",
            "IDR",
            "CIS",
            "AIF",
            "INVIT",
            "REIT"
          ],
          "flDataRange": {
            "unit": "MONTH",
            "value":{
            "max": 14
            }
          }
        },
        {
          "name": "NON-SEBI",
          "fiTypes": [
            "DEPOSIT",
            "TERM_DEPOSIT",
            "RECURRING_DEPOSIT",
            "INSURANCE_POLICIES",
            "LIFE_INSURANCE",
            "GENERAL_INSURANCE",
            "NPS",
            "GSTR1_3B"
          ],
          "flDataRange": {
            "unit": "MONTH",
            "value":{
            "max": 14
            }
          }
        }
      ],
      "frequency": {},
      "dataLife": {
        "unit": "MONTH",
        "value":{
        "max": 1
        }
      },
      "consentExpiry": {
        "unit": "MONTH",
        "value":{
        "max": 1
        }
      }
    }
  }
}
```

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