Customer Experience Guidelines for Interoperability v1.0.0

Driven by feedback received from the ecosystem via various webinars and discussions facilitated by Sahamati.

November 17, 2026

Disclaimer

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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
Version 1.0	November 17, 2026	First release

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1. Purpose and scope of this document

These guidelines define the user-experience principles for participants in the AA ecosystem implementing interoperability, as per the **API Specifications for Interoperability in the Account Aggregator Ecosystem** published by ReBIT on October 14, 2026. Participants must refer to the following documents for the technical and implementation requirements relating to the implementation of interoperability:

1.1. **Sahamati Interoperability Design Document:** Sets out the interoperability architecture, gateway design and ecosystem components. Published on the Sahamati Interoperability webpage: https://sahamati.org.in/interoperability-on-account-aggregator/

1.2. **ReBIT API Specifications:** Define the API specifications for AA, FIP and FIU interoperability. Published on the ReBIT API portal: https://api.rebit.org.in/

1.3. **Sahamati Technical Implementation Documents:** Provide additional technical details and implementation guidance for the interop: https://github.com/Sahamati/Interoperability-Ecosystem/

2. Definitions and key terminology:

The following terms shall have the meanings assigned to them below across all interoperability documents published by Sahamati.

2.1. **AA Architecture and Participants -** This section defines the key components of an AA deployment and the roles of FIPs and FIUs in the AA ecosystem.

2.1.1. **AA-Node:** refers to the complete AA deployment comprising the AA-Core and its two gateway functions, operating within one administrative domain.

2.1.2. **AA-Core:** refers to the core AA system as it exists today, which may require changes to support interoperability.

2.1.3. **AA-Gateway (GW):** refers to the two gateway functions within an AA-Node. Gateways are stateless, do not re-sign messages and do not read payloads.

2.1.4. **Demand Gateway (DGW):** refers to the gateway function that assists an AA in communicating with other AAs on the demand side.

2.1.5. **Supply Gateway (SGW):** refers to the gateway function that helps an AA communicate with other AAs on the supply side.

2.1.6. **FIU / FIP:** refers to the existing ReBIT-defined participants in the AA ecosystem. Their roles remain unchanged. An FIU interacts with its Connected-AA.

2.2. **Roles in Interoperability -** The following roles describe the position of an AA in an interoperable transaction and may vary based on the user journey.

2.2.1. **Connected-AA:** refers to the AA connected with the FIU, which relays the FIU's requests to the Customer-AA.

2.2.2. **Customer-AA:** refers to the AA that holds the customer's VUA and manages the customer's consent and data flows. It also acts as the Origin-AA on the supply side.

2.2.3. **Origin-AA:** refers to the AA that originates and owns an FIP-bound interaction end to end on the supply side.

2.2.4. **Inter-AA:** refers to the AA that carries another AA's FIP-bound traffic in transit. There is exactly one Inter-AA per path.

2.2.5. **Hop-AA (or Hop):** refers to the Connected-AA or Inter-AA that forwards a message between the two ends of a leg. The applicable role depends on the leg being discussed.

2.3. **Interoperability Infrastructure and Identifiers -** This section defines the APIs, registries, services and identifiers used to enable interoperability across the AA ecosystem.

2.3.1. ***/iop/:** refers to the parallel API endpoints used for interoperability.

2.3.2. **Sahamati Central Registry (CR)**: refers to the registry containing the entity IDs, endpoints and public keys of ecosystem participants.

2.3.3. **Sahamati Token Service**: refers to the service that issues tokens, with each token carrying the holder's entity ID as a claim.

2.3.4. **CR-AIG (AA Interoperability Graph):** refers to the enhanced capability of the Central Registry that records which AAs connect to which FIPs and other AAs.

2.3.5. **Virtual User Address (VUA):** refers to the customer's unique handle at an AA, for example, priya@AA-3, as defined by ReBIT Standards.

3. General Guidelines for User Experience under AA Interoperability

The key design principle is that the customer must remain in control of AA selection. The FIU may determine the interface and available methods of selection, but must not determine the customer's choice.

3.1. **Connected-AAs and Customer-AAs:** In accordance with Section 14.8 of Chapter III of the RBI's NBFC-AA Master Directions, which states that an NBFC-AA shall not use a third-party service provider to undertake the business of account aggregation, and Section 1.2 of ReBIT's AA Client Standards v1.0.0, which specifies that *the AA Client interacts directly with the AA server without any intermediate system or third party*, **the AA Client implementation must be that of the Customer-AA and not the Connected-AA.** AA Gateways and Connected-AAs must not host or operate the AA Client interface on behalf of another AA (Customer-AA). They may facilitate technical connectivity, routing and redirection to the Customer-AA, in accordance with latest Sahamati's Interoperability Design Guidelines and AA Redirection Guidelines, respectively.

3.2. **Connected-AAs and Customer-AAs:** The applicable requirements under the RBI guidelines and ReBIT's AA Client Standards v1.0.0 (or the latest version as applicable) must also be followed by all AAs during interoperability.

3.3. **FIUs** must ensure that **customers' choice of AA is upheld** irrespective of FIUs' integration with the AAs.

3.3.1. FIUs must enable features for customers to a) discover and select, or input their existing AA handles or b) create a new AA handle as per the customer's choice of AA amongst all operational AAs.

3.3.2. **Customer Registration and AA Handle Creation**: Must be deliberate actions initiated and expressly authorised by the customer, based on informed consent. Neither registration nor handle creation may happen silently in the background, be pre-selected, or be bundled with another action in a manner that prevents the customer from making a free and informed choice.

3.4. Once the customer selects an AA (or an existing AA handle), the **FIUs** must

3.4.1. route the customer to the selected AA by initiating the consent request through such AA, and

3.4.2. redirect the customer to the same AA to continue the consent journey.

3.5. In case the customer chooses to discover their VUA handles:

3.5.1. The **FIU** must enable discovery across all AAs through its connected AAs and display all the returned handles to the customer for selection.

3.5.2. The display of **AAs** and discovered handles must not favour any particular AA through ordering, prominence or pre-selection. Display of the AA handles may be done in the order of responses received.

3.5.3. **FIUs** must not store or retain discovered AA handles beyond the purpose for which they were received i.e. to show the customer their existing AA handles. Once the customer has made their selection, the FIU must not use or retain the other discovered handles for any purpose.

3.5.4. **VUA handles** must not be recorded in plain text in application logs. FIUs must mask VUA handles in logs to protect customer information.

3.5.5. **AAs** must use the hashed mobile number received through the /User/ discover or /iop/User/discovery call solely to match it against their existing customer records. Where no match is found, AAs must not store, retain, reuse or attempt to reverse-engineer the hashed number to derive the original mobile number. Any further use of the mobile number without valid customer consent would be inconsistent with DPDPA principles.

Feedback: In case of suggestions or feedback, please write to governance@sahamati.org.in

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