TPP Action required: HSBC position on EBA statement in relation to eIDAS certificates

In light of the recent EBA Statement in relation to eIDAS certificates issued to UK organisations, HSBC has developed an approach that will allow TPPs to swap their eIDAS certificates with OBWAC/OBSEAL certificates, whilst maintaining access to pre-existing consents.

We ask TPPs authorised in the UK who have registered with HSBC brands using their eIDAS certificates to take action now in order to protect business continuity. We encourage all certificate rotations to be completed by the end of November as support available during the month of December may be limited. Details of actions that need to be taken are listed in the table below:

| Scenario | TPP Authorised in | Certificate Used | Token Authentication Method User | Actions Required by TPP |
|----------|----------------------|------------------------------|-------------------------------------|---|
| Α | EU | eIDAS or OBWAC/ OBSEAL | Any | None |
| В | UK | OBWAC /OBSEAL | Any | None |
| С | UK | elDAS | private_key_kwt | Transport certificates (maintaining access) - TPPs must obtain an OBWAC certificate from the OBIE and start using this for the mtls handshake (transport certificate) - TPPs will not need to re-register with HSBC |
| | | | | Signing certificates (maintaining lasting consents) TPPs' lasting consents are bound to a list of private keys identified by the signing certificate (QSEAL) listed on the JWKS URL. This is provided by the TPP during registration. Lasting consents are also bound to the TPP's client ID TPPs must obtain an OBSEAL certificate from the OBIE and present this to HSBC for future requests In order to maintain access to lasting consents, the new certificate (OBSEAL) must be listed on the JWKS URL provided during the original registration. If the JWKS URL needs to be updated, TPPs must use the GET/register and PUT/register endpoints to update this TPPs must not re-register or change their client IDs, as consents are bound to TPPs' client IDs |
| | | eIDAS | tls_client_auth | Transport certificates (maintaining access) - TPPs must obtain an OBWAC certificate from the OBIE and start using this for the mtls handshake (transport certificate) - TPPs will not need to re-register with HSBC |
| D | UK | | | Signing certificates (maintaining lasting consents) TPPs' lasting consents are bound to the subject DN of the certificate used during registration, which varies in structure between eIDAS and OBIE certificates TPPs must obtain an OBSEAL certificate from the OBIE and present this to HSBC for future requests In order to maintain access to lasting consents, the TPP must use our GET/register and PUT/register endpoints and update their 'token_endpoint_auth_method' from 'tls_client_auth' to 'private_key_kwt' TPPs must also use our GET/register and PUT/register endpoints to update the JWKS URL. This needs to contain the certificate linked to the new OBSEAL TPPs must not re-register or change their client ID, as consents are bound to TPPs client IDs Once these steps are complete, TPPs can start presenting their new certificate and can also fulfil existing consents with the new certificate |