

SENDER ID – CODE OF CONDUCT

Knowing the Sender and Granting of Authorisation to Use a Sender ID Within the Scope of Traficom Regulation 28 on the interoperability of communications networks and services

1. Introduction and General Description of the Code of Conduct

This Code of Conduct has been prepared in cooperation between telecommunications operators and service providers. It supplements the Finnish Transport and Communications Authority Traficom's Regulation 28 concerning the interoperability of communications networks and services, in particular with respect to the customer due diligence obligation referred to in Section 10 of the Regulation and the acceptability of the sender ID used by a customer, in situations where messaging traffic is routed into a telecommunications operator's network via an application programming interface (API).

Regulation 28 imposes obligations on telecommunications operators but allows, pursuant to Section 10 of the Regulation, the practical implementation of the obligations described therein to be contractually delegated further down the messaging value chain to service providers.

Accordingly, the obligations set out in this Code of Conduct apply not only to telecommunications operators but also to service providers that are contractually bound to comply with this Code of Conduct. Compliance with this Code of Conduct does not, under any circumstances, exempt any party from complying with the obligations set out in Regulation 28. In addition, the processing of personal data shall comply with applicable data protection legislation.

Traficom has stated that this Code of Conduct provides a well-founded description of the practices required to meet the requirements of Regulation 28. Telecommunications operators operating in Finland have committed to complying with this Code of Conduct and require their contractual partners to do the same.

This Code of Conduct may be supplemented and amended as necessary. The version in force shall be published on Traficom's website. The amendment history is described at the end of this document.

2. Definitions Used in This Code of Conduct

Telecommunications Operator. An entity providing general telecommunication services as defined in the Act on Electronic Communications Services (917/2014), which conveys

messaging traffic referred to in Regulation 28 through its network and to which the Regulation 28 primarily applies.

Service Provider. An entity operating within the messaging value chain that provides messaging services to its customers and conveys messaging traffic into a telecommunications operator's network via an application programming interface.

Sender. An entity sending messages and to which authorisation may be granted to use a specific sender ID. Party to communication. Any references to the Sender's business activities shall also apply, mutatis mutandis, to associations and other organisations.

3. Knowing the Sender

3.1 The telecommunications operator shall know the Sender. The practical implementation of this requirement may be contractually delegated to a Service Provider. Knowing the Sender means identifying the Sender and the contact person acting on behalf of the Sender, sufficiently verifying their identities, and understanding the Sender's business activities.

3.2 Identification of the Sender means identifying the Sender organisation as an entity registered in an official authority register or otherwise verifiable through public sources.

3.3 Knowing the Sender includes understanding the Sender's business activities to a sufficient extent to assess whether authorisation to use a specific sender ID may be granted on the basis of the criteria set out in Section 4 of this Code of Conduct.

3.4 The contact person representing the Sender shall be identified in a reliable manner.

4. Authorisation to Use a Sender ID

Authorisation to use a specific sender ID may be granted to a Sender if one or more of the following conditions are met:

- The sender ID is the Sender's name, trademark, established domain name, or a clearly recognisable abbreviation or derivative thereof;
- The sender ID is closely connected to the Sender's lawful business activities;
- The Sender has registered the sender ID in the SMS Sender ID Registry maintained by Traficom;
- The sender ID is a Finnish telephone number to which the Sender has a demonstrable right of use.

Authorisation shall not be granted if the sender ID is misleading, offensive, or otherwise contrary to good practice. Authorisation shall neither be granted or maintained if another Sender has obtained exclusive rights to the sender ID by registering it in the SMS Sender ID Registry maintained by Traficom.

5. Approval Process and Cooperation Between Telecommunications Operators and Service Providers

5.1 A Service Provider to which a Telecommunications Operator has contractually delegated customer identification and the assessment of the criteria for granting authorisation to use sender IDs shall provide the telecommunications operator with information on the Senders and the sender IDs authorized for their use.

5.2 The telecommunications operator shall be entitled to rely on the Service Provider having fulfilled the obligations relating to knowing the Sender and sender ID approval and the Sender's right of use of a Finnish telephone number in accordance with Regulation 28 and this Code of Conduct.

5.3 Every time when providing information relating to sender IDs, the Service Provider warrants that it has identified the Senders and verified the acceptability of the sender IDs or the Sender's right to use a Finnish telephone number in accordance with Regulation 28 and this Code of Conduct.

5.4 A telecommunications operator may approve the use of a sender ID in its network upon receiving the information on the Sender's official name and the intended sender ID(s). Additional information may be required before approving a sender ID in the network or at any time during the validity of the authorisation including for example:

- The Sender's website address
- Contact details of the Sender's contact person
- The purpose of the use of the sender ID
- Information on whether the Service Provider has a direct contractual relationship with the Sender

6. Procedures in Problem Situations

6.1 If messaging traffic is found or reasonably suspected to be in breach of law, regulatory requirements, or this Code of Conduct, the Service Provider shall, at the request of the telecommunications operator, restrict such traffic and demonstrate compliance with all the above-mentioned rules.

6.2 In the problem situations referred to in Section 6.1, the Service Provider shall without delay take the necessary corrective measures. In such situations, both the Telecommunications Operator and the Service Provider shall, through cooperation, primarily seek to implement corrective measures that are as targeted as possible.

6.3 If the Sender's activities are found to be in breach of law, regulatory requirements, or this Code of Conduct, the Sender may be denied authorisation to use the sender ID. If the breach is minor, the Sender may be offered an opportunity to promptly rectify its activities.

6.4 If a Service Provider to which a Telecommunications Operator has delegated obligations under Regulation 28 materially or repeatedly fails to fulfil those obligations, the Telecommunications Operator may, in addition to other measures, restrict the Service Provider's messaging traffic into its network or block it entirely.

This Code of Conduct shall enter into force on 1 February 2026.

Digital Forum Finland association is responsible for the administration, maintenance and updating of these Codes of Conduct.

Contact: ilkka.lehto@digitalforum.fi

DISCLAIMER

This English-language version is a non-authoritative translation of the original Finnish document. In the event of any discrepancy, the Finnish version shall prevail.