

**MEMORANDUM**  
**The Danish Financial Supervisory Authority**

21 June 2022

**Statement on orders issued to Danske Bank A/S – discontinuation of the use of the NemID code card**

The Danish Financial Supervisory Authority (the Danish FSA) is of the opinion that the NemID code card does not meet the requirements to apply strong customer authentication when a user accesses his or her payment account online (for example through an online banking or mobile banking facility) and initiates electronic payments (in respect of e-commerce, for example) (see section 128(1)(i) and section 128(1)(ii) of the Danish Act on Payments). This is because the NemID code card is not protected from being copied or photographed, which is a requirement under article 7(2) of Commission Delegated Regulation (EU) 2018/389, which supplements the rules of the Danish Act on Payments. The rules took effect on 14 September 2019.

To ensure proper migration from NemID to MitID, the Danish FSA accepted a migration plan from Finance Denmark in which the migration to MitID – and thus from the use of the NemID code card – would be completed by 31 December 2021. At the request of Finance Denmark, the Danish FSA subsequently accepted to extend the deadline to 30 June 2022. In this connection, the Danish FSA emphasised that the deadline could not be extended any further.

Finance Denmark has informed the Danish FSA that it does not expect that all users of Danish banks will have migrated to MitID within the agreed deadline of 30 June 2022. Consequently, the Danish FSA considers it necessary to order Danske Bank A/S to discontinue the use of the NemID code card to apply strong customer authentication on or before 30 June 2022.

This means that, after 30 June 2022, Danske Bank A/S's customers will not be able to use the NemID code card to access Danske eBanking or initiate payments. Other solutions such as MitID, the NemID code app or the NemID token should be used instead.

In this connection, the Danish FSA will not order Danske Bank A/S to discontinue the use of the NemID code card to apply strong customer authentication for a limited group of users after 30 June 2022.

These are users who either

- are in their 30-day migration period
- have been granted an extension of their 30-day migration period on the basis of individual case handling at Danske Bank A/S or
- have not yet commenced their migration as they have not used their NemID in the period in which they could be selected for migration.

All use of the NemID code card must be discontinued by 31 October 2022 and users who migrate to MitID after 30 June must not be able to use the NemID code card once they have migrated to MitID.

In this connection, Danske Bank A/S must prepare a plan for migrating the remaining users and regularly inform the Danish FSA about the progress of the migration.