SUBSEMBLY
Banking Apps & APIs

BankAccessServer

Verification of Payee FinTS & EBICS

Subsembly GmbH

Meglingerstr. 19
81379 München

http://subsembly.com
bas@subsembly.com

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Introduction

The Subsembly BankAccessServer (BAS) provides VoP endpoints for accessing banks via FinTS (HBCI) and EBICS. The purpose of this document is to present the specific BAS requests and workflows for both endpoints.

VoP Explanation

Verification of Payee (VoP) is a new security procedure in SEPA payments, which becomes mandatory as of October 9, 2025. Its purpose is to prevent misdirected payments and fraud at an early stage: before a payment is executed, it is checked whether the account holder and the IBAN match.

The verification applies to all common payment types – single and bulk transfers, instant payments, and standing orders. The result is returned immediately and is typically classified as Match, Close Match, or No Match. Based on this feedback, the payer decides whether the transaction is released or adjusted.

For users, VoP provides additional transparency and security; for payment service providers, it is an obligation to implement this check correctly and efficiently into their systems. The BankAccessServer provides direct support for this in the relevant FinTS and EBICS endpoints, allowing VoP checks to be integrated without additional protocol knowledge.

FinTS

Introduction

At the FinTS endpoint of the BankAccessServer, single transfers are always subject to a Verification of Payee (VoP) check. For bulk transfers containing multiple items, however, there is an option to submit the payments either with or without VoP verification.

If the beneficiary details deviate from the registered data or cannot be clearly verified, an explicit confirmation by the originator is required. For this purpose, the `FinTSSendConfirmationOfPayeeRequest` is used.

Unlike single transfers, the VoP check for bulk transfers is not performed synchronously but afterwards. In this case, the response to the initial submission already indicates whether a separate `FinTSSendContinueRequest` is required and which polling interval must be observed.

Thus, the FinTS endpoint integrates VoP into both single and bulk transfers, ensuring that every payment is released in a transparent and traceable manner.

Examples

The following examples illustrate typical workflows of how VoP is integrated into FinTS requests within the BankAccessServer. They cover both the mandatory verification for single transfers as well as the optional variants for bulk transfers. In addition, they demonstrate the mechanisms for confirming mismatched beneficiary data and the subsequent polling process for VoP results in bulk transactions.

Single Transfer with VoP (Mandatory)

Description

Single transfers are always subject to a VoP check. In cases of *Close Match*, *No Match*, or *Not Applicable*, an explicit confirmation is required before SCA/execution can take place.

Request

```
"Orders": [
  {
    "OrderId": "{{$randomInt}}",
    "Type": "FinSepaSingRemittRequest",
    "OrderAcct": {{Acct}},
    "SepaDocument": {{SCTSepaDocument}}
  }
]
```

Response – Confirmation required (Close Match)

```
{
  "Type": "FinTSNeedConfirmationOfPayeeResponse",
  "OrderId": "626",
  "Order": "<Order>",
  "VopID": "<VopID>",
  "VopResult": {
    "GroupStatusCode": "RVCM",
    "HaveInformation": true,
    "HaveNarrative": true,
    "Narrative": "Es wurde ein Abgleich des Empfängernamens durchgeführt
(Opt-In)...",
    "HaveStatusSummaries": false,
    "StatusCount": 0,
    "HaveTransactionResults": true,
```

```
    "TransactionResults": [
      {
        "Caption": "NAHEZU Übereinstimmung",
        "Description": "Der angegebene Empfängername stimmt NUR NAHEZU ...",
        "StatusCode": "RVMC",
        "CorrectCreditorName": "Andreas Gustav",
        "OriginalCreditorName": "Andreas Gustav Seller",
        "OriginalCreditorAccountIBAN": "<IBAN>",
        "OriginalEndToEndId": "SUB-20250828085014-53398078656",
        "OriginalAmount": 0.04,
        "OriginalPaymentInformationIndex": 0,
        "OriginalTransactionInformationIndex": 0,
        "OriginalTransactionIndex": 0
      }
    ]
  }
}
```


Interpretation

- `GroupStatusCode: "RVCM"` = Close Match at group level; at least one transaction requires confirmation.
- `TransactionResults[0].StatusCode: "RVMC"` = Close Match at transaction level; `CorrectCreditorName` provides the creditor name expected by the bank (for UI display).
- In the case of a Match, depending on the provider's implementation, SCA may also be requested immediately (without the confirmation step).

Send Confirmation (Release Close/No Match/Not Applicable)

For the confirmation, the **Order** and **VopID** from the above response are required.

```
"Orders": [
  {
    "OrderId": "{{$randomInt}}",
    "Type": "FinTSSendConfirmationOfPayeeRequest",
    "Order": "<Order>",
    "VopID": "<VopID>"
  }
]
```

Notes

- *Match*: The bank may directly trigger SCA (no `FinTSSendConfirmationOfPayeeRequest`).
- *Close Match / No Match / Not Applicable*: Confirmation is required.
- The UI should display `CorrectCreditorName` as a suggestion (for transparency and fewer failed attempts).

Bulk Transfer with VoP

Description

For bulk transfers, the VoP check is normally processed asynchronously. The submission first returns a `FinTSNeedContinueResponse` containing the polling interval. Subsequently, if required, a `FinTSNeedConfirmationOfPayeeResponse` is provided with VoP results at both group and transaction level. Confirmation is then carried out, as with single transfers, using `FinTSSendConfirmationOfPayeeRequest`.

Request (VoP enabled via `VopOptInPreferred`)

```
"Orders": [
  {
    "OrderId": "{{$randomInt}}",
    "Type": "FinSepaMultRemittRequest",
    "OrderAcct": {{Acct}},
    "SepaDocument": {{SCTSepaDocument}},
    "VopOptInPreferred": true
  }
]
```

Intermediate Response – Continue/Polling

Indicates that the VoP check is still in progress and specifies the polling interval to be used for retrieving the final results.

```
{
  "Type": "FinTSNeedContinueResponse",
  "OrderId": "309",
  "Order": "<Order>",
  "ContinueWaitSeconds": 1
}
```

Response – Confirmation Required (Mixed Results)

Returns the VoP outcomes at both group and transaction level. If mismatches or unverified beneficiaries are detected, an explicit confirmation by the originator is required before the bulk transfer can be executed.


```
{
  "Type": "FinTSNeedConfirmationOfPayeeResponse",
  "OrderId": "337",
  "Order": "<Order>",
  "VopID": "<VopId>",
  "VopResult": {
    "GroupStatusCode": "RVCM",
    "HaveInformation": true,
    "HaveNarrative": false,
    "HaveStatusSummaries": true,
    "StatusSummaries": [
      {
        "StatusCode": "RCVC",
        "Count": 1,
        "Narrative": "Ein Empfängername stimmt vollständig mit dem Namen des
Kontoinhabers überein. Bei Falschüberweisung wegen Abweichung des Empfängernamens
haftet die Bank."
      },
      {
        "StatusCode": "RVMC",
        "Count": 1,
        "Narrative": "Ein Empfängername stimmt nur teilweise mit dem Namen des
Kontoinhabers überein. Sie können der Ausführung des Auftrags dennoch zustimmen. In
diesem Fall übernimmt die Bank keine Haftung für Falschüberweisungen an vom
Empfängernamen abweichende Kontoinhaber."
      },
      {
        "StatusCode": "RVNA",
        "Count": 1,
        "Narrative": "Ein Empfängername konnte nicht überprüft werden. Sie können
der Ausführung des Auftrags dennoch zustimmen. In diesem Fall übernimmt die Bank
keine Haftung für Falschüberweisungen an vom Empfängernamen abweichende
Kontoinhaber."
      }
    ],
    "StatusCount": 3,
    "HaveTransactionResults": true,
    "TransactionResults": [
      {
        "Caption": "Übereinstimmung",
```

```
        "Description": "Der angegebene Empfängername stimmt mit dem Namen des Kontoinhabers der IBAN überein.",
        "StatusCode": "RCVC",
        "OriginalCreditorName": "Maria Schmidt",
        "OriginalEndToEndId": "SUB-20250828094131-64435163675",
        "OriginalCreditorAccountIBAN": "DE65100500000001234567",
        "OriginalAmount": 1.00,
        "OriginalPaymentInformationIndex": 0,
        "OriginalTransactionInformationIndex": 0,
        "OriginalTransactionIndex": 0
      },
      {
        "Caption": "NAHEZU Übereinstimmung",
        "Description": "Der angegebene Empfängername stimmt NUR NAHEZU mit dem Namen des Kontoinhabers der IBAN überein.\r\nDer richtige Empfängername lautet \"Maria Berta\"",
        "StatusCode": "RVMC",
        "CorrectCreditorName": "Maria Schmidt",
        "OriginalCreditorName": "Maria Berta Schmidt",
        "OriginalEndToEndId": "SUB-20250828094158-04418385940",
        "OriginalCreditorAccountIBAN": "DE65100500000001234567",
        "OriginalAmount": 2.00,
        "OriginalPaymentInformationIndex": 0,
        "OriginalTransactionInformationIndex": 1,
        "OriginalTransactionIndex": 1
      },
      {
        "Caption": "NICHT geprüft",
        "Description": "Überprüfung durch Empfängerbank fehlgeschlagen.",
        "StatusCode": "RVNA",
        "NotApplicableReasonCode": "TimeOutByDebtorAgent",
        "NotApplicableDescription": "Überprüfung durch Empfängerbank fehlgeschlagen.",
        "OriginalCreditorName": "Maria",
        "OriginalEndToEndId": "SUB-20250828094219-29218898820",
        "OriginalCreditorAccountIBAN": "DE65100500000003456789",
        "OriginalAmount": 3.00,
        "OriginalPaymentInformationIndex": 0,
        "OriginalTransactionInformationIndex": 2,
        "OriginalTransactionIndex": 2
      }
    ]
  }
```

```
}
```

Interpretation

- `FinTSNeedContinueResponse` specifies the polling interval via `ContinueWaitSeconds`; afterwards, another `FinTSSendContinueRequest` must be sent.
- `GroupStatusCode: "RVCM"` = successfully verified, but with mismatches present.
- `StatusSummaries` provide a quick overview (counts per result type).
- `TransactionResults` deliver detailed information, including `CorrectCreditorName` for Close Match cases.
- Confirmation of *Close/No/Not Applicable* is performed via `FinTSSendConfirmationOfPayeeRequest` (parameters: `Order`, `VopID`).

Send Confirmation (Release Close/No/Not Applicable)

```
"Orders": [
  {
    "OrderId": "{{$randomInt}}",
    "Type": "FinTSSendConfirmationOfPayeeRequest",
    "Order": "<Order>",
    "VopID": "<VopId>"
  }
]
```

Bulk Transfer without VoP

Description

Bulk transfers can also be processed **without** VoP verification, provided they contain more than one item.

Request (VoP disabled via `VopOptInPreferred`)

```
"Orders": [
  {
    "OrderId": "{{$randomInt}}",
    "Type": "FinSepaMultRemittRequest",
    "OrderAcct": {{Acct}},
    "SepaDocument": {{SCTSepaDocument}},
    "VopOptInPreferred": false
  }
]
```

EBICS

Introduction

The BankAccessServer EBICS endpoint provides flexible control over whether payments are executed with or without Verification of Payee (VoP). Users can choose whether an order is submitted directly (CCT/CIP) or first subjected to a VoP check (CTV/CIV).

A new transaction type, **VPZ**, has been introduced, which allows VoP documents to be retrieved explicitly. In addition, VEU orders automatically include the corresponding VoP result if a VoP check has been performed. This means EBICS in the BankAccessServer offers full integration of VoP into existing payment processes, without requiring additional protocol expertise.

Examples

Upload of a SEPA Order with VoP Verification (CTV/CIV)

Description

A SEPA order can be submitted in such a way that it is mandatorily subject to a VoP check. This is done using the order types **CTV** or **CIV**.

Request

```
"Orders": [
  {
    "Type": "EbicsOrderSepaRequest",
    "OrderType": "CTV",
    "SepaDocumentSerialized": "<SepaDocument>"
  }
]
```

Response

```
{
  "Type": "EbicsOrderGenericResponse",
  "EbicsOrderID": "LRA9",
  "BusinessReturnCode": { ... },
  "OrderSignatures": [ ... ],
  "Success": true,
  "TechnicalReturnCode": { ... }
}
```

Provision of VoP Information in the VEU Order

Description

As part of the Distributed Electronic Signature (VEU), VoP results can be included directly within the order. This provides signatories with full transparency as to which transactions are valid and which require confirmation.

Request (HVT for VEU details)

```
"Orders": [
  {
    "Type": "EbicsOrderHVTRequest",
    "PartnerId": "{{EbicsPartnerId}}",
    "OrderDetails": {
      "OrderID": "LRA9",
      "OrderType": "CTV"
    },
    "CompleteOrderData": false
  }
]
```

Response

```
{
  "ResponseOrderData": {
    "NumOrderInfos": 3,
    "OrderInfos": [
      {
        "AccountInfos": [
          { "AccountHolder": "Arnold Auftraggeber", "AccountHolderRole":
"Originator", "IBAN": "DE86990003540000002000" },
          { "AccountHolder": "Maria Schmidt", "AccountHolderRole": "Recipient",
"IBAN": "DE65100500000001234567" }
        ],
        "Amount": 3.01,
        "Currency": "EUR",
        "TypedDescriptions": [
          { "Type": "VoPStatus", "Description": "RCVC" },
          { "Type": "Purpose", "Description": "Überweisung an Maria Schmidt" }
        ],
        "VopStatusCode": "RCVC"
      },
```

```
      {
        "AccountInfos": [
          { "AccountHolder": "Arnold Auftraggeber", "AccountHolderRole": "Originator", "IBAN": "DE86990003540000002000" },
          { "AccountHolder": "Erich Empfänger", "AccountHolderRole": "Recipient", "IBAN": "DE12500105170648489890" }
        ],
        "Amount": 4.07,
        "Currency": "EUR",
        "TypedDescriptions": [
          { "Type": "VoPStatus", "Description": "RVMC" },
          { "Type": "Purpose", "Description": "Überweisung an Erich Empfänger" }
        ],
        "VopStatusCode": "RVMC",
        "VopCloseMatchName": "Erich Empfänger"
      },
      {
        "AccountInfos": [
          { "AccountHolder": "Arnold Auftraggeber", "AccountHolderRole": "Originator", "IBAN": "DE86990003540000002000" },
          { "AccountHolder": "Thomas Müller", "AccountHolderRole": "Recipient", "IBAN": "DE42250106000000012345" }
        ],
        "Amount": 3.11,
        "Currency": "EUR",
        "TypedDescriptions": [
          { "Type": "VoPStatus", "Description": "RVNM" },
          { "Type": "Purpose", "Description": "Überweisung an Thomas Müller" }
        ],
        "VopStatusCode": "RVNM"
      }
    ]
  }
}
```

Interpretation

- `RCVC` = Full match.
- `RVMC` = Close Match, expected name provided in `VopCloseMatchName`.
- `RVNM` = No Match.
- Using `TypedDescriptions`, both the VoP status and the payment purpose can be displayed explicitly in the frontend.

Abfrage der VoP-Dokumente mittels VPZ

Kurzbeschreibung

Mit dem Geschäftsvorfall **VPZ** können VoP-Dokumente gezielt abgerufen werden. Diese enthalten strukturierte Statusinformationen für gesamte Zahlungsnachrichten und einzelne Transaktionen.

Request

```
"Orders": [
  {
    "Type": "EbicsOrderVPZRequest",
    "DateTimeFrom": "{{StartDate}}"
  }
]
```

Response

```
{
  "VopDocuments": [
    {
      "Message": {
        "OriginalMessageIdentification": "M20250828080945",
        "OriginalMessageNameIdentification": "pain.001",
        "OriginalNumberOfTransactions": 3,
        "GroupStatus": "RVCM",
        "OriginalPaymentInformations": [
          {
            "OriginalPaymentInformationIdentification": "P20250828080946",
            "PaymentInformationStatus": "RVCM",
            "OriginalTransactionInformations": [
              {
                "OriginalEndToEndId": "NOTPROVIDED",
                "TransactionStatus": "RCVC",
                "Creditor": { "Name": "Maria Schmidt" },
                "CreditorAccountIBAN": "DE65100500000001234567"
              },
              {
                "OriginalEndToEndId": "NOTPROVIDED",
                "TransactionStatus": "RVMC",
                "Creditor": { "Name": "Erich Empfänger" },
```

```
                "CreditorAccountIBAN": "DE12500105170648489890"
              },
              {
                "OriginalEndToEndId": "NOTPROVIDED",
                "TransactionStatus": "RVNM",
                "Creditor": { "Name": "Thomas Müller" },
                "CreditorAccountIBAN": "DE42250106000000012345"
              }
            ]
          }
        ]
      },
      "MessageInfo": {
        "PainIdentifier": "pain.002.001.10"
      }
    }
  ]
}
```

Interpretation

- VPZ provides structured pain.002 reports with VoP-specific information.
- `GroupStatus: RVCM` = successfully verified, but with mismatches present.
- Transactions with `RCVC`, `RVMC`, and `RVNM` are listed individually. This enables VoP results to be documented and archived transparently, even retrospectively.

Overview of VoP Status Codes

Status Codes at Transaction Level

Code	Meaning	Description
RCVC	Match	Beneficiary name fully matches the account holder’s name.
RVMC	Close Match	Beneficiary name only partially matches; \`CorrectCreditorName\` contains the correct name.
RVNM	No Match	Beneficiary name does not match; order must be explicitly confirmed.
RVNA	Not Applicable	Beneficiary name could not be verified (e.g. timeout or technical restriction).
PDNG	Pending	The result of the VoP check is not yet available.

Status Codes at Group Level

Code	Meaning	Description
RCVC	Completed	Successfully verified, no mismatches.
RVCM	CompletedWithMismatches	Successfully verified, but with mismatches.
PDNG	Pending	The result of the VoP check is not yet available.