
Briefing

Companies Registration Office filings – upcoming requirement to provide Personal Public Service Number or Verified Identity Number



INSTITUTE OF DIRECTORS
IN IRELAND

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With effect from 23 April 2023, the Companies Registration Office (“CRO”) will require that all company directors of Irish companies provide either their Personal Public Service number (“PPSN”) or Verified Identity number (“VIN”) when filing the following forms with their offices:

- Form A1 – for incorporation of a new company
- Form B1 – annual return
- Form B10 – for the appointment or resignation of a director, or change of their details
- Form B69 – notice by a director of cessation of office where a company has failed to file a form B10

As such companies, and/or presenters, should start to take steps to ensure that all directors have either a PPSN or VIN available to provide in advance of the next applicable filing of any of the abovementioned forms with the CRO.

Providing a PPSN or VIN

Where a director holds a PPSN, this number must be provided with the above forms.

If a director does not hold a PPSN, they must (obtain, if necessary, a VIN and) provide their VIN to the CRO in conjunction with the above filings.

If an RBO Transaction Number was issued to a director for the purpose of filings with the Central Register of Beneficial Ownership of Companies and Industrial & Provident Societies (the “RBO”), this RBO number will automatically be

reclassified as a VIN by the CRO in the coming weeks and it will not be necessary to obtain and provide a separate number in such cases.

If a director does not presently hold either a PPSN or RBO Transaction Number, it will be necessary for such director to apply to the CRO to have a VIN issued to them, by means of a Form VIF (Declaration as to Verification of Identity). This form must state the name, date of birth, nationality and address of the director for whom a VIN is being sought.

Will the PPSN or VIN be publicly available/viewable?

Neither the PPSN nor VIN will appear on the summary page of any CRO filing, nor will it be publicly available.

Rather this information is submitted to the CRO ‘in the background’ alongside the rest of the form information.

When the PPSN or VIN filed with the CRO has been validated, this data will be retained and stored securely by the CRO in an irreversible hashed/encrypted format. It will not be accessible by any member of the CRO, or any other party, and it will never be shared by the CRO with any third party.

Further information

The CRO have published a helpful FAQ in relation to the introduction of this additional requirement, available [here](#).

Further information is available from



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Alternatively, your usual contact in McCann FitzGerald LLP will be happy to help you further.



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