

CENTRAL KYC RECORDS REGISTRY

CKYC/2026/08

Date: April 22, 2026

To: All entities registered with Central KYC Records Registry (CKYCRR)

Dear Sir / Madam,

Sub: Management of Legacy Data at CKYCRR by the Reporting Entities

The Central KYC Records Registry (CKYCRR) has made significant strides in digitizing Know Your Customer (KYC) records across India. As on date, CKYCRR holds approximately 112 crore digitized CKYC records against India's population. While this represents a landmark achievement, the challenge of legacy data compliance among Reporting Entities (REs) remains a substantive concern that requires immediate attention and structured remediation.

It is critical to note that the actual volume of pending legacy data far exceeds what is apparent from the simple arithmetic difference between the population and the digitized records. This is attributable to the following compounding factors:

- Many individuals became customers of multiple REs before the CKYC framework became operative i.e. 01-01-2017, and their KYC records were maintained in silos.
- A CKYC record, once generated by one RE (say RE B when the customer onboarded with it) may not have been linked by another RE (RE A) with which the same individual was already a customer, even if the record exists on CKYCRR.
- Identifiers used for onboarding (PAN) earlier may not match the primary OVD now registered with CKYCRR.

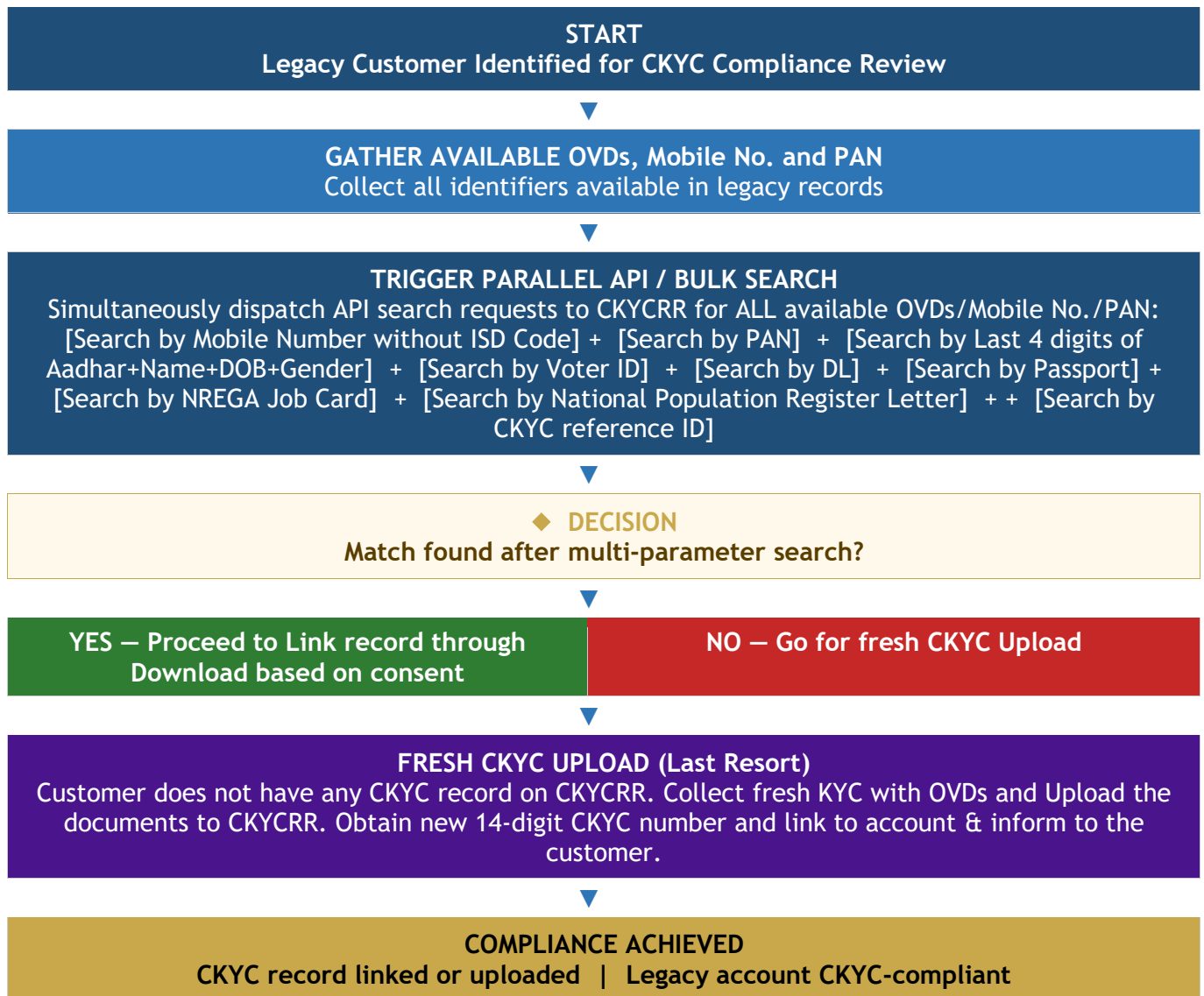
Under the prevailing regulatory framework, Reporting Entity is not required to collect fresh KYC documents from a customer. Instead, the Reporting Entity is required to retrieve the CKYC Record from CKYCRR, verify its sufficiency and link it to the customer's account. Failure to do so results in a CKYC compliance gap, notwithstanding the existence of a valid record on CKYCRR. The root cause of this failure is typically a sub-optimal search process i.e. Reporting Entity conducting a limited, single-parameter search and upon not finding a record, erroneously concludes that the customer is not registered on CKYCRR.

A single-parameter search is likely to fail in legacy data scenarios for the following reasons:

- The OVD used for original onboarding at one Reporting Entity may not be the OVD registered on CKYCRR by the other Reporting Entity.
- Name spelling variations and abbreviations can prevent exact matches.

- Date of birth may be recorded in different formats (DD/MM/YYYY vs. YYYY-MM-DD).
- The customer may have changed their address or contact details (Mobile Number) between the legacy onboarding and the CKYC registration.

The following flowchart illustrates the recommended step-by-step process for REs to conduct effective CKYC search for legacy customers using multi-parameter search optimization:



For REs that have not yet integrated their back-end legacy systems with the CKYC API, the SFTP-based Bulk Search mechanism provides an interim solution for large-scale legacy data remediation:-

- REs may prepare a batch search file containing multiple search criteria for legacy customers in the prescribed format available under **Downloads** section at www.ckycindia.in
- A single bulk search file submission can contain multiple search requests with different parameters using different identity codes and their values for the same customer.
- Results from the bulk search will indicate which identifier(s) returned a confirmed match, enabling the RE's operations team to proceed with linkage.
- **REs are strongly encouraged to migrate from SFTP-based bulk search to real-time API integration at the earliest, given the superior speed and automation capability of the API.**

It is re-iterated to follow sequential process of search on multiple parameters, download and upload the record on the CKYCRR only in case of unsuccessful search on multiple parameters to ensure full compliance.

For any questions or clarifications, please reach out to the helpdesk.

For and on behalf of **Central KYC Records Registry**

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