



# BIOMETRIC CURP: NEW LEGAL OBLIGATION IN MEXICO FOR NATIONALS AND FOREIGN RESIDENTS

*On July 16, 2025, a decree amending the General Law of Population was published in the Official Gazette of the Federation, creating the Biometric CURP as a mandatory national identification document.*

## **I. What changes?**

Articles 91 to 91 Sexies and 114 Bis are added to the General Law of Population:

- The CURP becomes the official identification document.
- It will now include mandatory biometric data (fingerprints and photograph).
- All public and private entities must require the Biometric CURP to provide services or carry out procedures.
- A Single Identity Platform is created to manage, validate, and consult CURP data.

## **II. Who is subject to this obligation?**

- Mexican nationals.
- Foreigners with regular immigration status in Mexico (temporary or permanent residents).
- All public and private entities (e.g., companies, banks, notaries, hospitals, schools, etc.).

## **III. Timeline**

- July 17, 2025: the reform enters into force.
- Regulation: within a maximum period of 90 calendar days, the Federal Executive must issue the Regulation referred to in the Law.
- October 2025: public and private entities must have updated their systems.
- January 2026: beginning of widespread issuance of the Biometric CURP.
- February 2026: national obligation for all official procedures.



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## IV. Implications for companies

- Human resources: biometric CURP will be mandatory for the hiring of both national and foreign personnel.
- Contracts: identification clauses must be updated to include the Biometric CURP.
- Personal Data: companies will be responsible for processing biometric data in compliance with the Federal Law on the Protection of Personal Data Held by Private Parties.
- Privacy notices: must be updated to include the processing of biometric data.
- Digital processes: identity validation systems must be adapted to accept the new Biometric CURP.

## V. Penalties

- Article 114 Bis sets forth fines ranging from 10,000 to 20,000 UMAs (approximately MXN \$1.13M to \$2.26M in 2025) for repeated non-compliance.
- Liable parties: authorities and private entities that fail to request or accept the Biometric CURP.

## In summary:

- **The Biometric CURP includes fingerprints and a photograph.**
- **It is mandatory and must be universally accepted throughout Mexico.**
- **It will be issued in both physical and digital formats.**
- **Companies must update their administrative, hiring, tax, and privacy processes.**
- **Non-compliance may result in million-peso fines.**



## Team

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