

Public consultation on the review of the revised payment services Directive (PSD2) and on open finance

Fields marked with * are mandatory.

Introduction

This consultation is available in all European Union official languages.

Please use the language selector at the top of this page to choose your language for this consultation.

Purpose and structure of the consultation

The Commission is launching this public consultation to gather evidence for the PSD2 review and to inform its work on open finance. It targets the public, and no in-depth knowledge of PSD2 or open finance is required. It is available in all official EU languages.

As well as this public consultation, two targeted consultations will be launched, one [targeted consultation on the review of PSD2](#) and the [targeted consultation on the open finance framework](#). These consultations will have more detailed questions that require specific knowledge of payment services, the PSD2, and data sharing in the financial sector. These targeted consultations are only available in English.

We invite you to respond to

- **this public consultation** if you have little knowledge about the payments industry and the relevant laws
- one or both of the **targeted consultations** if you are a professional stakeholder in the payments industry, e.g. you are a payment institution employee, represent a financial institution members' association, or are knowledgeable about payments

The results of all the consultations will inform the PSD2 review and open finance policy. The results may also serve as input for impact assessments accompanying any possible legislative proposals revising the PSD2 or putting in place an open finance framework.

In addition to answering to the questions raised in this online survey, you can add any useful documents and /or data (this can be done at the end of this questionnaire).

Please give concrete examples in your answers when possible. Where appropriate, please make specific operational suggestions to the questions raised. This will support the review process.

Background

The [revised Payment Services Directive \(Directive 2015/2366/EC\)](#) is the basis for payment rules in the EU. The [first Payment Services Directive](#), adopted in 2007, was revised to modernise rules due to increased digitalisation of payments and the emergence of new payment services providers and types of payment services. The Directive became applicable in January 2018, except for some rules on strong customer authentication (SCA) and access to payment accounts, which apply since September 2019.

PSD2 includes rules to

- make it easier and safer to use online payment services
- better protect payment services users against fraud, abuse, and payment problems
- promote innovative payment services
- strengthen the rights of payment services users

PSD2 sets out the conditions under which digital payments are to be executed. For example

- how long it should take for an account to be credited (execution time)
- whether there are fees associated with the transaction
- safety measures to be applied to ensure the security of the payment
- the liability regime in the event of unauthorised access (fraud), i.e. who is responsible
- how to file complaints

PSD2 focuses on digital payments, e.g. non-cash payments using payment instruments such as cards, credit transfers, direct debits, etc. that can be made in person or via online banking, e.g. via a mobile phone.

Since the adoption of PSD2, the payments market has continued to evolve with new players entering the market, more advanced payments technologies (such as contactless) emerging, and payments needs changing. These market changes warrant an in-depth analysis.

The review aims to assess the effectiveness, efficiency, costs and benefits, coherence and the EU added value of the Directive. It will determine if the PSD2 objectives have been achieved or if changes are needed (and if so, the type and scope of changes). Any forward-looking aspects will also consider the Commission's ongoing work on the open finance framework.

The review will have two dimensions. It will be backward-looking (evaluating the application and impact of the Directive) and forward-looking (assessing the need for possible legislative amendments ensuring that EU retail payment rules remain fit for purpose and future-proof).

As regards open finance, the revised PSD2 opened up access to customers' payment accounts data, enabling third-party information and financial service providers to reuse this data with the customer's agreement. The general purpose of this data reuse was to offer competing financial services or information services, such as comparison tools and data aggregation across several providers. Thus, the PSD2 effectively laid the ground for 'open banking', or the principle of third-party access to customer data in the area of banking products and services. Open finance as a concept is broader and goes beyond the scope of payments account data in the revised PSD2, as it could cover a range of financial services, such as investment in securities, pensions and insurance.

In 2020, the Commission set data-driven finance as one of the priorities in its [digital finance strategy](#) and announced an open finance framework legislative proposal. As reiterated in the [capital markets union \(CMU\) Communication of November 2021](#), the Commission is now accelerating this work as an integral part of the European financial data space. In the broader framework of the [data strategy for Europe](#), the objective is to make the most of the data economy for EU capital markets, consumers and businesses. Building on the PSD2, this will ensure that more data are available for innovative financial services. It will also give consumers more choice and help them find products that best fit their investment preferences (including sustainable products), while continuing to give them control of their data, including who can access it. This should directly contribute to increasing retail investment.

Please note: In order to ensure a fair and transparent consultation process **only responses received through our online questionnaire will be taken into account** and included in the report summarising the responses. Should you have a problem completing this questionnaire or if you require particular assistance, please contact fisma-psd2-review@ec.europa.eu.

More information on

- [this consultation](#)
- [the consultation document](#)
- [the related call for evidence on the review of PSD2](#)
- [the related targeted consultation on the review of PSD2](#)
- [the related call for evidence on the open finance framework](#)
- [the related targeted consultation on the open finance framework](#)
- [payments services](#)
- [the protection of personal data regime for this consultation](#)

About you

* Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish

- Dutch
- English
- Estonian
- Finnish
- French
- German
- Greek
- Hungarian
- Irish
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

* First name

Ellen

* Surname

Timmer

* Email (this won't be published)

ellen.timmer@pellicaan.nl

* Country of origin

Please add your country of origin, or that of your organisation.

- | | | | |
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Nevis | <input type="radio"/> Zimbabwe |
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* Field of activity or sector (if applicable)

- Accounting
- Auditing
- Banking

- Credit rating agencies
- Insurance
- Pension provision
- Investment management (e.g. hedge funds, private equity funds, venture capital funds, money market funds, securities)
- Market infrastructure operation (e.g. CCPs, CSDs, Stock exchanges)
- Social entrepreneurship
- Other
- Not applicable

* Please specify your activity field(s) or sector(s)

lawyer

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association', 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

* Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

The type of respondent that you responded to this consultation as, your country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself.

Public

Your name, the type of respondent that you responded to this consultation as, your country of origin and your contribution will be published.

I agree with the [personal data protection provisions](#)

Payment methods

Question 1. How do you usually pay for goods and services?

For each payment method, please indicate how often you use it

a) In a physical shop:

	1 (preferred option)	2 (sometimes)	3 (never)	Don't know - No opinion - Not applicable
Cash	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Payment card (debit or credit)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Digital wallet on mobile phone	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Other payment solutions	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please specify to what other payment solution(s) you refer in your answer to question 1 a):

750 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

b) Online:

	1 (preferred option)	2 (sometimes)	3 (never)	Don't know - No opinion - Not applicable
Payment card (debit or credit)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Digital wallet on mobile phone	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Digital wallet on PC or laptop	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Bank transfer	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other payment solutions



Please specify to what other payment solution(s) you refer in your answer to question 1 b):

750 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

New payment solutions I scarcely use because the cybersecurity is unclear. iDEAL is a well functioning payment system, though the intermediaries are vague. Cybercrime is very much on the rise in NL, so any payment solution should meet high standards, also it is necessary that users can verify if it is secure and no malware.

Question 2. The Payment Services Directive aims to promote innovative internet-based and mobile payment services.

Do you think that the payments market is innovative enough?

- Yes
- No
- Don't know / no opinion / not applicable

In recent years, **new payment service providers** have entered the market. Many are not banks, and they include big tech companies (i.e. large online platforms offering search engines, social networking services and more).

Question 3.1 Do you believe that you have a larger choice of payment services than you did 5 years ago?

- Yes
- No, I have the same choice as before
- No, I have less choice
- Don't know / no opinion / not applicable

Question 3.2 What do you think about new companies, including big tech companies, entering the payments market?

1000 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

I have seen new vague foreign parties entering the payments market. Their quality is unclear, they usually only work online and have no offices. There is no high quality way to check their activities, e.g. through a consumer organisation. So I am not going to use them.

I am very much against big tech companies entering the payments markets. They have already obtained a lot of personal data in illegal ways and will increasingly do that through analysing payment transactions.

Currently Europe and NL are very weak in enforcing basic European rights, like GDPR. First the data harvesting of big tech should completely stop and these companies should be completely reorganised and strongly supervised, before being able to enter the payments market.

To use these services, payment service providers need access to your payment account(s) data, which requires your consent. There are two kinds of providers

- **Account information services providers (AISP):** these access data from your online accessible payment account(s) and consolidate these data to, for example, help you manage your finances
- **Payment initiation services providers (PISP):** these provide an online service that accesses your payment account to transfer funds on your behalf with your consent and authentication. For example, you could have payment accounts from different banks together in a PISP app on your phone and transfer funds from any of those payment accounts directly from the app

AISPs and PISPs do not actually handle your funds. Once they have your consent, AISPs get access to your transaction history, and PISPs facilitate the payment, but they never come into possession of your funds.

Question 3.3 Do you use AISPs and/or PISPs?

- I only use AISP(s)
- I only use PISP(s)
- I use both AISPs and PISPs
- I don't use any of them
- Don't know / no opinion / not applicable

Digital payments

Question 4. Do you make digital payments?

- Yes
- No
- Don't know / no opinion / not applicable

Open finance

Open finance refers to a customer allowing their data to be shared or re-used by financial institutions and other third-party service providers to access a wider range of innovative services. It could cover different sets of data (business-to-business and business-to-consumer data) across a range of financial services (e.g. banking, insurance, investment, pensions). Consumers would be able to grant trusted third-party service providers access to their data, held by financial institutions or other service providers, in a safe and secure way until they decide to revoke their permission. As a result, consumers would have access to better or new services from these third-party service providers, including better-targeted financial advice, tools to manage their finances, and additional financial services. While the revised Payment

Services Directive includes rules on such access for payment accounts (see previous sections of this consultation), no framework currently exists for other financial products.

Question 5. Would you be willing to share the following types of data held by your financial service provider (e.g. bank, insurance company, investment company) with other financial or third-party service providers to get access to new services (e.g. comparing offers, switching providers, financial services tailored to your situation and needs)?

	Yes	No	Don't know - No opinion - Not applicable
Savings account data	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Mortgage loan data	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Consumer credit data	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Securities account data	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Pension data	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Insurance data	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please explain your answer to question 5:

750 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Currently harvesting of personal data is the business model of many adtech companies in the world, they sell personal data to the highest bidders (including criminals). There is no adequate supervision of these activities that are detrimental to all humans in the world. This also applies to the EU. As long as the regulations regarding harvesting personal data and supervision are inadequate, it is unwise to offer financial institutions the possibility to harvest and reuse personal data, even if the data subject has consented. Note that under PSD2, Europe has ignored the fact that financial transaction data also contains the data of counterparties, counterparties who have not given their consent to the use of their personal data.

Question 6. Should financial service providers holding your data be obliged to share them with other financial or third-party service providers, provided that you have given your consent?

- Yes
- No

- Don't know / no opinion / not applicable
-

Question 7. Do you think there are security and/or privacy risks in giving other service providers access to your data?

- Yes
 No
 Don't know / no opinion / not applicable

Please explain your answer to question 7:

750 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

See answer under 5. First strong legislation regarding all types of data harvesting should be in place, including licensing of all data brokers, that have to include reliability testing of executives, periodical testing of systems, etcetera. The illegal activities by companies outside and inside the EU have to stop. Another risk is that people will only get reasonable prices for financial products if the let financial databrokers analyse their personal data (including transaction data). This is dangerous and violates the freedom principles in EU legislation. Europe and the member states lack the level and maturity to deal with this issue properly.

Question 8. Do you think financial service providers that hold your data always ask for your consent before sharing those data with other financial or third-party service providers?

- Yes
 No
 Don't know / no opinion / not applicable
-

Question 9. If shared with another financial or third-party service provider, do you think these data are used exclusively for the purposes for which you have agreed?

- Yes
 No
 Don't know / no opinion / not applicable

Question 9.1 If not, how could this best be ensured?

750 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

This will only possible in a high level system in which all databrokers are intensely monitored and supervised. Such a system currently is not in place. In all of Europe data protection supervisors are underfunded. Europe is not ready for this.

Exchanging data between different service providers could be made more secure by putting in place a dedicated technical infrastructure for that purpose (e.g. a secure application programming interface).

Question 10. If service providers holding data put in place such infrastructure, do you think they should be able to charge a fee to other service providers who access data using this infrastructure?

- Yes
- No
- Don't know / no opinion / not applicable

Please explain your answer to question 10:

750 character(s) maximum

including spaces and line breaks, i.e. stricter than the MS Word characters counting method.

Necessary to have a level playing field

Additional information

Should you wish to provide additional information (e.g. a position paper, report) or raise specific points not covered by the questionnaire, you can upload your additional document(s) below. **Please make sure you do not include any personal data in the file you upload if you want to remain anonymous.**

The maximum file size is 1 MB.

You can upload several files.

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

Useful links

[More on this consultation \(https://ec.europa.eu/info/publications/finance-consultations-2022-psd2-review-open-finance_en\)](https://ec.europa.eu/info/publications/finance-consultations-2022-psd2-review-open-finance_en)

[Consultation document \(https://ec.europa.eu/info/files/2022-psd2-review-open-finance-consultation-document_en\)](https://ec.europa.eu/info/files/2022-psd2-review-open-finance-consultation-document_en)

[Related call for evidence on the review of PSD2 \(https://ec.europa.eu/info/law/better-regulation/initiatives/plan-2012798_en\)](https://ec.europa.eu/info/law/better-regulation/initiatives/plan-2012798_en)

[Related targeted consultation on the review of PSD2 \(https://ec.europa.eu/info/publications/finance-consultations-2022-psd2-review_en\)](https://ec.europa.eu/info/publications/finance-consultations-2022-psd2-review_en)

[Related call for evidence on the open finance framework \(https://ec.europa.eu/info/law/better-regulation/initiatives/plan-2021-11368_en\)](https://ec.europa.eu/info/law/better-regulation/initiatives/plan-2021-11368_en)

[Related targeted consultation on the open finance framework \(https://ec.europa.eu/info/publications/finance-consultations-2022-open-finance_en\)](https://ec.europa.eu/info/publications/finance-consultations-2022-open-finance_en)

[More on payments services \(https://ec.europa.eu/info/business-economy-euro/banking-and-finance/consumer-finance-and-payments/payment-services/payment-services_en\)](https://ec.europa.eu/info/business-economy-euro/banking-and-finance/consumer-finance-and-payments/payment-services/payment-services_en)

[Specific privacy statement \(https://ec.europa.eu/info/law/better-regulation/specific-privacy-statement_en\)](https://ec.europa.eu/info/law/better-regulation/specific-privacy-statement_en)

Contact

fisma-psd2-review@ec.europa.eu