

EBA/RTS/2017/10	
EBA/ITS/2017/07	
13 December 2017	

Final Report

on Draft Regulatory Technical Standards setting technical requirements on development, operation and maintenance of the electronic central register and on access to the information contained therein, under Article 15(4) of Directive (EU) 2015/2366 (PSD2),

and

Draft Implementing Technical Standards on the details and structure of the information entered by competent authorities in their public registers and notified to the EBA under Article 15(5) of Directive (EU) 2015/2366 (PSD2)



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1. Abbreviations

AIS account information services

AISP account information service provider

API application programming interface

ASPSP account servicing payment service provider

CA competent authority

CP Consultation Paper

EBA European Banking Authority

EBA Register Electronic central register of the EBA

EEA European Economic Area

EMD2 Directive 2009/110/EC (Electronic Money Directive)

EU European Union

IP internet protocol

ITS implementing technical standards

NPR national public register

PIS payment initiation services

PISP payment initiation service provider

PSD1 Directive 2007/64/EC (Payment Services Directive)

PSD2 Directive (EU) 2015/2366 (Revised Payment Services Directive)

PSP payment service provider

QTSP qualified trust service provider

RTS regulatory technical standards

TPP third party provider



2. Executive summary

Article 15(1) of Directive (EU) 2015/2366 on payment services in the internal market (PSD2) provides that 'EBA [European Banking Authority] shall develop, operate and maintain an electronic central register that contains information as notified by competent authorities (CAs)'. In support of the above, PSD2 confers a mandate on the EBA to 'develop draft regulatory technical standards (RTS) setting technical requirements on development, operation and maintenance of the electronic central register and on access to the information contained therein'. Article 15(5) of PSD2 continues by mandating the EBA to 'develop draft implementing technical standards (ITS) on the details and structure of the information pursuant to paragraph 1 of Article 15 of the PSD2'.

In order to deliver these mandates, the EBA published a Consultation Paper (CP) with its proposals, for a two-month consultation period that ran from 24 July to 18 September 2017. The EBA received 33 responses to the CP submitted predominantly by industry stakeholders. The EBA has assessed the responses with a view to deciding if any amendments need to be made to the draft RTS and ITS before issuing the Final report.

With regard to the draft RTS, among other comments received, the majority of the respondents to the CP were of the view that the EBA Register under PSD2 should be updated automatically in real time, available 24/7 and machine-readable.

In the light of these comments, the EBA has decided to slightly amend the functionalities of the application of the EBA Register, which would now allow (i) CAs to provide information to the EBA more frequently than once a day, where appropriate; (ii) the EBA Register to process and validate the automatically transmitted information as soon as possible but at the latest by the end of the day on which it is received; and (iii) public users to download the content of the EBA Register, both manually and automatically.

With regard to the draft ITS, the majority of the respondents to the CP were of the view that the EBA Register should be the only source of 'truth' regarding the activities of all payment service providers (PSPs) in the EU, including credit institutions, and that the information contained therein should be more comprehensive and standardised.

However, while such a comprehensive register would be desirable for all market participants, the EBA has to reiterate that it is not legally able to include credit institutions in the EBA Register, because the mandate under Article 15(5) of PSD2 requires the EBA to develop a register based on a pre-defined list of institutions, in which, however, credit institutions are not included.

Finally, the EBA has reconfirmed its decision not to include credit institutions in the EBA Register, the EBA took into account the view of the respondents and introduced additional information on the dates of authorisation or registration, the service provided in the host Member State and the commercial names used by payment and electronic money institutions.



Next steps

The final draft RTS and ITS will be submitted to the Commission for adoption. Following the submission, the RTS will be subject to scrutiny by the European Parliament and the Council before being published in the Official Journal of the European Union.

The EBA will be able to carry out the development of the EBA Register only after the adoption of the draft RTS and ITS. Therefore, the EBA will not be able to have the EBA Register in place at the date of application of PSD2, which is 13 January 2018; it will be in place only later in the year.



3. Background and rationale

3.1 Background

- 1. On 13 January 2016, Directive (EU) 2015/2366 on payment services in the internal market (PSD2) entered into force, and it will apply from 13 January 2018. PSD2 aims, inter alia, to enhance the transparency of the operation of payment institutions that are authorised by, or registered with, competent authorities (CAs) of the Member States, and ensure a high level of consumer protection in the European Union (EU), by providing for easy public access to the list of all natural and legal persons providing payment services.
- 2. In order to meet the above-mentioned objectives, Article 15(1) of PSD2 requires the European Banking Authority (EBA) to 'develop, operate and maintain an electronic central register that contains information as notified by competent authorities in accordance with paragraph 2 of Article 15'. The paragraph further specifies that 'EBA shall make the register publicly available on its website, and shall allow for easy access to and easy search for the information listed, free of charge'.
- 3. Furthermore, Article 15(2) of PSD2 imposes an obligation on CAs of the Member States to 'notify EBA of the information entered in their public registers'.
- 4. In support of the above provisions, Article 15 of PSD2 entrusts the EBA with two mandates related to the establishment and operation of the electronic central register. More specifically, Article 15(4) of PSD2 mandates the EBA to 'develop draft regulatory technical standards setting technical requirements on the development, operation and maintenance of the electronic central register and on access to the information contained therein'. This paragraph further specifies that 'the technical requirements shall ensure that modification of the information is only possible by competent authorities and the EBA'. Article 15(5) of PSD2 also requires the EBA to 'develop draft implementing technical standards on the details and the structure of the information to be notified in accordance with paragraph 1 of Article 15, including the common format and model in which this information is to be provided'.
- 5. Furthermore, according to Article 3(1) of Directive 2009/110/EC (EMD2), as amended by Article 111 of PSD2, the above requirements shall also apply *mutatis mutandis* to electronic money institutions and the electronic money services they provide.
- 6. A draft Consultation Paper (CP) on the draft RTS and ITS on the EBA Register under PSD2 was published in July 2017 for a two-month consultation period, which closed on 18 September 2017. The EBA received 33 responses, 4 of which were confidential. The responses were submitted predominantly by industry stakeholders.



7. The EBA assessed the responses from the consultation and made changes to the draft RTS and ITS where relevant. The feedback table in section 6.2 (pages 101 to 146) provides an exhaustive and comprehensive list of the 107 distinct issues raised by the respondents and an analysis of each by the EBA. The Rationale section below (3.2) summarises the subset of the issues raised by respondents that appeared to be particularly pertinent to respondents and/or resulted in more substantive changes to the technical standards.

3.2 Rationale

Options for provision of information to the EBA

- 8. When developing the CP on the draft RTS and ITS on the EBA Register, the EBA decided to include two functionalities for the provision of information from CAs to the EBA: a manual and an automated one.
- 9. The manual option would allow members of staff of a CA to log into the application of the EBA Register, and manually submit, modify and/or delete information in the Register. By contrast, the automated option would allow the whole set of information contained in the national public registers (NPRs) to be automatically reloaded onto the EBA Register once a day. This would be achieved by the establishment of an interface between the application of the EBA Register and the applications of the NPRs.
- 10. The majority of the respondents, however, suggested that the EBA should introduce a technological solution for the EBA Register that is fully automated and updated in real time. They suggested that this would allow account servicing payment service providers (ASPSPs) to check automatically the authorisation or registration status of the undertakings that access their systems in order to provide payment initiation services (PIS) and account information services (AIS).
- 11. These respondents were also of the view that the approaches for the provision of information to the EBA that were included in the CP would not ensure that the information in the EBA Register is up to date; this would put in question the reliability of the register as a source of information for the purposes of the payments industry. The respondents considered this to be particularly relevant in the context of the EU-wide nature of the payments market and also for the identification of fraudulent entities.
- 12. Some of these respondents further clarified that, in their view, all CAs should provide information to the EBA automatically and use the manual provision of information only as a fall-back option.
- 13. Having assessed these responses, the EBA, among other things, considered that the purpose of the EBA Register, as envisaged by PSD2, is to provide a list of all authorised or registered payment and electronic money institutions in the EU by aggregating information provided by the



CAs and making it publicly available. The EBA sees no indication in PSD2 that would suggest that the aim of the EBA Register is to facilitate and intervene in the process of provision of payment services in the EU by providing solutions for the interoperability between the systems of the various market participants.

- 14. Furthermore, the EBA arrived at the view that CAs should have discretion to decide on the approach for the provision of information to the EBA, because CAs that have a small number of undertakings published on their NPR, and do not update their NPR very frequently, would not have demand for a fully automated solution for provision of information to the EBA. These CAs would therefore also be faced with excessive costs for the implementation and support of the interface established between the applications of the NPRs and the EBA Register.
- 15. The EBA, therefore, decided not to take on board the comments submitted by these respondents. However, the EBA tried to adapt the technological solution for automated transmission of information that had been proposed in the CP in order to meet some of the needs of the industry. Therefore, the EBA made changes to the draft RTS related to the automated transmission of information with the following result:
 - CAs will transmit information to the EBA as and when a change to their NPR is made, and do so by the end of the day.
 - The EBA will introduce a date and time stamp in the information provided by CAs to ensure transparency about the point in time of the last synchronisation between the EBA Register and the NPRs.
 - The EBA streamlined the processes related to processing, validation and publication of information by the application of the EBA Register by making information provided by CAs publicly available in the EBA Register as soon as it has been processed and validated but no later than the end of the day.
 - In the event of failed validation, CAs will be required to update the information related to withdrawal or granting of authorisation or registration as soon as possible, but at the latest by the end of the day.

Automated search, retrieval and download of the EBA Register

16. During the development of the CP, the EBA considered but disregarded the possibility of introducing a functionality in the EBA Register which would allow external applications to communicate automatically with the EBA Register, through open application programming interface (API), by searching and retrieving the information in the EBA Register. At the time, the EBA considered this 'machine-readable' functionality to be too costly for the EBA to develop and implement, while at the same time it would not bring many benefits for the public users of the EBA Register.



- 17. The majority of the respondents, however, suggested that the EBA should incorporate the above functionality, because it would:
 - facilitate up-to-date and straight-through processing of data, including the identity and the authorisation or registration status of the undertakings; respondents consider that this would reduce the financial losses for the industry stakeholders from fraudulent third parties;
 - reduce the cost for the industry stakeholders because otherwise they would need to
 either hire additional staff to carry out the manual checks in the EBA Register or develop
 different automated solutions to search and download the content of the divergent
 NPRs;
 - reduce the operational risk for the industry because manual searches are considered to be prone to errors; and
 - reduce the cost for certain market participants because otherwise ASPSPs would be forced to introduce additional fees.
- 18. The EBA re-assessed the case for and against the development of an API and decided it would result in a significant increase in the implementation and operational costs for the EBA and could also delay the development of the EBA Register.
- 19. The EBA also considered that introducing free automated access to the application of the EBA Register by an undefined number of external parties would significantly increase the security risk and might jeopardise the availability of the register.
- 20. Moreover, the requested functionality is not directly linked to the objectives of PSD2 related to the EBA Register in accordance with recital 42 of PSD2: increasing transparency, ensuring a high level of consumer protection and facilitating cooperation between the home and host competent authorities.
- 21. However, the EBA acknowledged the benefits that automated search and retrieval of information would bring to some industry stakeholders and has, therefore, decided, in line with the suggestions by some respondents to the public consultation, to introduce an alternative solution for automated download of the content of the EBA Register.
- 22. This alternative solution will allow the content of the EBA Register to be available for automated download at any given time as a standardised file that will be machine-readable. The industry stakeholders will then be able to search and retrieve information automatically from this standardised file. The EBA will be required to update the file at least twice a day at pre-specified time-slots.



Credit institutions in the EBA Register

- 23. Credit institutions were not included in the draft ITS on the EBA Register as proposed in the CP, because the EBA arrived at the view that it is not legally able to introduce credit institutions to the register and to require CAs to provide information about them. Moreover, only three CAs had notified the EBA that they intend to make information about credit institutions publicly available in their NPRs under PSD2.
- 24. In response, almost all of the respondents were of the view that ASPSPs and credit institutions providing PIS and AIS should also be included in the EBA Register. These respondents suggested that, by doing so, the EBA would ensure a high level of consumer protection and contribute to an efficient market for payment services in the EU, by providing a single list of all PSPs, which will therefore be treated equally, and would reduce the negative effect on cross-border provision of services. Some of the respondents were also of the view that this information could be used for the purposes of the RTS on Strong Customer Authentication and Common and Secure Communication.
- 25. However, having assessed these responses, the EBA continues to be of the view that it would not be possible to include credit institutions in the EBA Register because they are neither covered by the mandate under Article 15(5) of PSD2 nor made publicly available in the majority of NPRs under PSD1.
- 26. Moreover, the EBA took into account that both the EBA and CAs operate separate registers for credit institutions and that all authorised credit institutions included in these registers are entitled to provide the whole range of payment services, including AIS and PIS, and to do so without any need for additional authorisation.

Detail of the information in the EBA Register

- 27. During the development of the CP, the EBA observed that the information published in the NPRs varies significantly among CAs. Therefore, two options were considered at the time: to have more detailed information, with some types of information that will be optional for CAs to provide; or to have less detailed information that should be mandatory for all CAs to provide. In the CP, the EBA proposed the second option. The rationale behind this choice was that the EBA cannot impose additional information requirements on the CAs and this would ensure that the information entered in the EBA Register is consistent among the different Member States, with the same level of transparency and a level playing field for all payment and electronic money institutions.
- 28. The majority of the respondents to the public consultation, however, were of the view that the EBA should increase the level of detail of the information contained in the EBA Register. These respondents suggested that, in order for the EBA Register to be considered a comprehensive information tool, the EBA should also include, among other types of information:



- contact details of payment and electronic money institutions, such as a telephone number, email address and website;
- services provided in the host Member State;
- dates of authorisation or registration of payment and electronic money institutions;
- commercial names of payment and electronic money institutions;
- information about qualified certificates, such as the issuing and validity date, the internet protocol (IP) address and the name of the qualified trust service provider;
- both national registry codes and legal identifiers;
- payment services provided through agents;
- contact details of agents;
- dates of registration of agents.
- 29. The EBA assessed these suggestions and used several assessment criteria to justify whether or not changes need to be introduced in the draft ITS on the EBA Register, including:
 - if the information is made or could be made publicly available by the majority of the CAs;
 - if the suggestion is directly linked to the objectives of the EBA Register as specified under recital 42 of PSD2;
 - if the collection and publication of the information would not impose an excessive administrative burden on CAs;
 - if the information is available to the CAs;
 - if the information that CAs possess is reliable and up to date.
- 30. Having applied these criteria, the EBA arrived at the view that some of these suggestions could indeed be taken on board while others would have to be rejected, as stated below.

Suggestions by respondents that the EBA incorporated

- 31. As stated in paragraph 27, during the development of the CP, the EBA decided to have less detailed information that will be mandatory for CAs to provide. At that time, the EBA was of the view that the EBA cannot introduce additional information requirements for CAs and that the information contained in the EBA Register should include only information that is made publicly available by all CAs.
- 32. However, in the light of the feedback received from the market, and after a more comprehensive assessment of the legal scope of the two mandates, the EBA arrived at the view that the mandate under Article 15(5) of PSD2 can be interpreted more broadly and that



additional information can feasibly be requested from CAs for inclusion in the EBA Register but that it would need to be strongly justified and be in line with the objectives laid down by PSD2 for the EBA Register.

- 33. The EBA therefore decided to introduce some additional types of information requirements in the draft ITS, which would increase the level of detail of the EBA Register. These types of information are:
 - a. the services provided in the host Member State;
 - b. the dates of authorisation or registration of payment and electronic money institutions;
 - c. the commercial names of payment and electronic money institutions.
- 34. In relation to a) above, the EBA decided to include this information in the EBA Register because it considered the information about these services to be of added value for the facilitation of the cooperation between the home and host CAs. In the EBA's view, the availability of this information would ensure that there are no mismatches between the information provided by home CAs through the passport notification procedure on the services provided in the territory of the host Member State and the information included in the NPR of the respective home CA.
- 35. The EBA also considered that, by including these services in the EBA Register, the EBA would increase the transparency of the operations of payment and electronic money institutions in the EU and would ensure higher consumer protection by making public users of the EBA Register aware of the services actually carried out in the host Member State. Moreover, the EBA noted that all CAs possess this information and are obliged to keep it up to date under PSD2.
- 36. The EBA also decided to include the dates of authorisation or registration of payment and electronic money institutions in the EBA Register because, by doing so, the EBA will reduce uncertainty about the status of payment and electronic money institutions at any given time, will allow PSPs to better assess complaints of payment service users, and will have a positive effect on consumers' confidence in the services provided by these institutions. The EBA also took into account that all CAs possess this information, that the majority of the CAs make it publicly available, that the provision of this information is directly linked to the three objectives of PSD2 laid down for the EBA Register, and that it would be a one-off requirement for CAs, which should keep the administrative burden on them to a minimum.
- 37. Finally, the EBA decided to include the commercial names of payment and electronic money institutions in the register, because it considered that this information would have a direct positive impact on consumer protection and confidence, given that many consumers might know and be able to identify a certain payment or electronic money institution only by its commercial name.



38. However, the EBA took into account that this information is either not consistently collected by CAs or not made publicly available on their NPRs. Also, not all payment or electronic money institutions use commercial names, or have notified the CAs that have authorised or registered them of the commercial names that they use. Therefore, the EBA decided that the 'commercial name' should be provided by CAs, but only on an optional basis, because the EBA would not be able to ensure that this information is equally collected and consistently made publicly available by all CAs. This is the only exception from the general rule that all information in the draft ITS should be mandatory for CAs to provide.

Suggestions by respondents that the EBA did not incorporate

- 39. The EBA disagreed with the suggestion to include contact details of payment and electronic money institutions because (i) this information is not currently publicly available in the majority of the NPRs; (ii) CAs are not regularly updated on changes to the contact details of the undertakings; and (iii) public users could always refer to NPRs and other sources of publicly available information.
- 40. The EBA also decided not to include information about qualified certificates because it considered it not to be directly linked to the objectives of PSD2 for the EBA Register and because most CAs would not possess this information and, therefore, cannot make it publicly available.
- 41. The EBA also conduded that it should not incorporate the information related to agents that some respondents suggested should be included, because such a requirement would impose a significant administrative burden on CAs to publish this information and keep it up to date. Moreover, the majority of the CAs do not make this information publicly available and the CAs cannot ensure that it is up to date because the undertakings that have been authorised by or registered with the respective CA might not regularly notify that authority about the changes to the information that have occurred.
- 42. With regard to the services provided through agents, in addition to what has been introduced in the previous paragraph, the EBA is of the view that, in most cases, agents provide the whole set of payment services for which the respective payment or electronic money institution is authorised or registered. Moreover, in accordance with Article 20(2) of PSD2, payment and electronic money institutions are liable for any acts of their agents.
- 43. Regarding the suggestion to include in the EBA Register two different identifiers (legal identifier and national registry code) for the undertakings, the EBA is of the view that the main purpose of these identification numbers is for the users of the register to be able to identify the undertaking. Therefore, the EBA does not see merit in having two separate identification numbers with the same function. The EBA also considered that, in most cases, the national registry code will be identical to the legal identifier, which would result in inconsistently populated content of the EBA Register.



44. The above concludes the substantive changes that have been made or rejected by the EBA in the draft RTS and ITS. However, compared with the RTS and ITS that had been proposed in the CP, an additional presentational change has been made: the EBA has removed former Articles 1 and 2 from the two technical standards, which used to repeat wording from the Directive itself to remind the reader of the mandate that PSD2 conferred on the EBA. The EBA has removed these articles to be in line with EBA drafting principle that the wording of Level 1 text should not be repeated or amended in Level 2 technical standards.



4. EBA FINAL Draft regulatory technical standards setting technical requirements on development, operation and maintenance of the electronic central register and on access to the information contained therein, under Article 15(4) of Directive (EU) 2015/2366 (PSD2)



COMMISSION DELEGATED REGULATION (EU) No .../..

of XXX

[...]

supplementing Directive (EU) 2015/2366 of the European Parliament and of the Council with regard to regulatory technical standards for setting technical requirements on development, operation and maintenance of the electronic central register and on access to the information contained therein

THE EUROPEAN COMMISSION,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Directive (EU) 2015/2366 of the European Parliament and of the Council of 25 November 2015 on payment services in the internal market, amending Directives 2002/65/EC, 2009/110/EC and 2013/36/EU and Regulation (EU) No 1093/2010, and repealing Directive 2007/64/EC¹ and in particular the third subparagraph of Article 15(4) thereof, Whereas:

- (1) Pursuant to Article 15(1) of Directive (EU) 2015/2366, the EBA (European Banking Authority) is required to develop, operate and maintain an electronic central register that contains information as notified by the competent authorities in accordance with paragraph (2) of Article 15 of Directive (EU) 2015/2366.
- (2) In order to ensure that the information contained in the electronic central register is accurately presented, the EBA should ensure that the insertion or modification of information is being carried out in a secure manner. To that end, the EBA should grant personal access to the application of the register to members of the staff of the competent authorities. The EBA and the competent authorities which have decided to transmit information in the electronic central register automatically should ensure that safe and proportionate encryption techniques are used in the end-points and throughout the transmission of the information.
- (3) Considering that it is necessary that the electronic central register of the EBA contains standardised and consistent information for all payment and electronic money institutions established in the European Union, presented in the same format, the application of the register should perform data validation before any information inserted or modified by the competent authorities has been made publicly available.
- (4) With a view to ensuring the authenticity, integrity and non-repudiation of the information contained in the electronic central register, the EBA should guarantee that the information is safely stored and any inserted or modified information has been properly recorded.
- (5) In order to allow payment service users and other interested parties to use the electronic central register efficiently, it is necessary that the application of the register be developed in a

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¹ OJ L 337, 23.12.2015, p. 35.



- way that guarantees it would operate in a reliable manner and be accessible without interruptions.
- (6) It is desirable that the users of the electronic central register be able to efficiently search the information in the register through different search criteria.
- (7) In order to fulfil the needs of the payment industry, the EBA should make the content of the register available for download through a standardised file. This would allow all interested parties to automatically search information in that file, for example in the case of account servicing payment service providers that want to verify the authorisation status of a payment initiation or account information service provider.
- (8) This Regulation is based on the draft regulatory technical standards submitted by the EBA to the Commission.
- (9) The EBA has conducted open public consultations on the draft regulatory technical standards on which this Regulation is based, analysed the potential related costs and benefits and requested the opinion of the Banking Stakeholder Group established in accordance with Article 37 of Regulation (EU) No 1093/2010².

HAS ADOPTED THIS REGULATION:

CHAPTER 1 GENERAL PROVISIONS

Article 1 – Type of information

The electronic central register of the EBA shall contain information in accordance with the requirements set out in the Commission implementing regulation (EU) N_{2} .../... (the ITS on the EBA Register).

Article 2 – Internal users of the register

- 1. A member of the staff of competent authorities that is responsible for manually inserting and modifying information in the register shall be considered an internal user.
- 2. Each competent authority shall appoint at least two internal users who shall be responsible for inserting and modifying information manually in the electronic central register of the EBA.
- 3. Competent authorities shall notify the EBA of the identity of the persons referred to in paragraph (2).

Article 3 – Management of the register

The EBA shall be responsible for managing the list of internal users, providing these users with the authentication details, and providing technical support to the competent authorities.

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² Regulation (EU) No 1093/2010 of the European Parliament and of the Council of 24 November 2010 establishing a European Supervisory Authority (European Banking Authority), amending Decision No 716/2009/EC and repealing Commission Decision 2009/78/EC (OJ L 331, 15.12.2020, p. 12).



Article 4 – Access by internal users

- 1. The application of the electronic central register of the EBA shall be accessed by internal users by using two-factor authentication.
- 2. The EBA shall provide a default username and password and the other security credentials to the internal users for accessing the application of the electronic central register.
- 3. Internal users shall change their default username and password at their first log-in into the application of the electronic central register of the EBA.
- 4. The application of the electronic central register of the EBA shall ensure that the authentication method applied allows the identification of each internal user.
- 5. The application of the electronic central register of the EBA shall not allow information in the register to be inserted or modified by persons who do not have access to the application of the register and/or who do not have the appropriate permissions to do so.

Article 5 – Public users

- 1. Public users of the electronic central register of the EBA shall be payment service users and other interested parties, who access the electronic central register through the website of the EBA.
- 2. Public users shall be able to access the electronic central register of the EBA without using access credentials.
- 3. The access of public users to the electronic central register of the EBA shall allow them only to read, search and download the information contained in the register. Public users shall not have any rights to modify the content of the register.
- 4. When public users access the electronic central register of the EBA, the website of the EBA shall display the search criteria specified in Article 16(1).

CHAPTER 2

PROVISION OF INFORMATION FROM COMPETENT AUTHORITIES TO THE EBA

Article 6 – Provision of information from competent authorities to the EBA

- 1. Competent authorities shall provide to the EBA the information that will be contained in the electronic central register manually via a web user interface or automatically via an application to application interface.
- 2. Competent authorities shall notify the EBA about their preferred approach for provision of information under paragraph (1).
- 3. The competent authorities which provide information to the EBA automatically shall be allowed to provide information to the EBA manually upon prior notification to the EBA.
- 4. Competent authorities shall provide to the EBA a hyperlink to their national public register. EBA shall make these hyperlinks publicly available in the electronic central register.

Article 7 – Manual insertion and modification of information

1. Competent authorities which have decided to provide information to the EBA manually shall insert or modify information for their respective Member States in the web application of the



- electronic central register of the EBA. The information shall be entered in the format specified in the Commission implementing regulation (EU) № .../... (the ITS on the EBA Register).
- 2. The manually inserted or modified information in the electronic central register of the EBA shall be made publicly available in the register after it has been validated in real time by the application of the register.
- 3. When manually inserted or modified information fails to be validated by the application of the electronic central register of the EBA, the information shall be rejected and not be made publicly available. The internal user shall insert or modify the corrected information once again.
- 4. The EBA shall insert a date and time stamp in the manually inserted or modified information in the electronic central register. This date and time stamp shall display the moment of the last change to the register.
- 5. Competent authorities shall ensure that all changes to the content of their national public registers related to the granting or withdrawal of authorisation or registration are inserted in the electronic central register of the EBA by the end of the same day.

Article 8 – Automated provision of information

- 1. Competent authorities which have decided to provide information to the EBA automatically shall transmit information directly from the applications of their national public registers to the application of the electronic central register of the EBA.
- 2. The EBA and the competent authorities shall ensure secure transmission of information between the applications of their respective registers in order to safeguard the authenticity, integrity and non-repudiation of the information transmitted, using strong and widely recognised encryption techniques.
- 3. Competent authorities shall transmit to the EBA in a single batch file with a common structured format the whole set of information set out in the Commission implementing regulation (EU) № .../... (the ITS on the EBA Register) contained in their national public registers.
- 4. The transmission of the batch file referred to in paragraph (3) shall take place at least once on the same day when the content of a national public register has been changed.
- 5. If competent authorities amend the content of their national public registers in relation to the granting or withdrawal of authorisation or registration and they are unable to transmit those changes automatically, they shall insert them manually by the end of the same day.
- 6. The EBA shall allow the competent authorities to transmit a batch file once a day irrespective of whether the content of their national public registers has been changed or not.
- 7. The EBA shall use a common standard format for the batch file referred to in paragraph (3).
- 8. The information automatically transmitted to the electronic central register of the EBA shall be made publicly available in the register as soon as possible after the batch file referred to in paragraph (3) has been processed and validated by the application of the electronic central register of the EBA but at the latest by the end of the same day. All information previously transmitted or manually inserted by a competent authority which is publicly available in the electronic central register of the EBA shall be replaced by the newly transmitted information by that competent authority.
- 9. The EBA shall not allow competent authorities to transmit a new batch file before they have received the outcome of the validation of their previously transmitted batch file.



- 10. When automatically transmitted information fails to be validated by the application of the electronic central register of the EBA, the whole set of information contained in the batch file referred to in paragraph (3) shall be rejected and not made publicly available in the register.
- 11. The EBA shall insert a date and time stamp in the information automatically transmitted to the application of the electronic central register. This date and time stamp shall display the moment of the last synchronisation between the electronic central register and the national public registers.

Article 9 – Validation of information

- 1. The application of the electronic central register of the EBA shall validate the information provided by competent authorities to the EBA in order to avoid any missing information or duplication.
- 2. In order to avoid any missing information, the application of the electronic central register of the EBA shall perform data validation on the fields filled in or provided by the competent authorities to the EBA with the exception of the field for the commercial name of the natural or legal person.
- 3. In order to avoid duplication of the information, the application of the register shall perform data validation on the following fields:
 - (a) for payment institutions, natural or legal person benefiting from an exemption pursuant to Article 32 of Directive (EU) 2015/2366, account information service providers, electronic money institutions, legal persons benefiting from an exemption pursuant to Article 9 of Directive 2009/110/EC, the institutions referred to in points (4) to (23) of Article 2(5) of Directive 2013/36/EU and the persons with withdrawn authorisation or registration:
 - (i) the national identification number; and
 - (ii) the type of natural or legal person;
 - (b) for agents of payment institutions, natural or legal person benefiting from an exemption pursuant to Article 32 of Directive (EU) 2015/2366, account information service providers, electronic money institutions and legal persons benefiting from an exemption pursuant to Article 9 of Directive 2009/110/EC:
 - (i) the national identification number of the agent; and
 - (ii) the national identification number of the natural or legal person on behalf of which the agent provides payment services;
 - (c) for service providers carrying out services under points (i) and (ii) of point (k) and point (l) of Article 3 of Directive (EU) 2015/2366:
 - (i) the national identification number of the service provider; and
 - (ii) the exclusion under which it carries out activities.
- 4. When a natural or legal person, which has agents providing payment services on its behalf, has its status of authorisation or registration changed from 'authorised' or 'registered' to 'withdrawn', the application of the electronic central register of the EBA shall not perform data validation on the agents linked to the withdrawn person.
- 5. Competent authorities shall receive a response from the application of the electronic central register of the EBA about the outcome of the data validation process without delay.
- 6. The outcome of the data validation process under paragraph (5) shall be communicated by the EBA to the competent authorities in a clear and unequivocal way. The outcome of the data



- validation under paragraph (5) shall also include the percentage change to the content of the information previously transmitted.
- 7. When the provision of information fails the validation process, the EBA shall include in its response to the competent authorities all the reasons for the rejection.
- 8. In the event of failed validation, competent authorities which provide information automatically shall, by the end of the same day, transmit a corrected or updated batch file with the whole set of information or manually insert any new changes made to the content of their national public registers related to the granting or withdrawal of authorisation or registration.
- 9. Competent authorities shall notify the EBA about the types of national identification numbers and their format which competent authorities use in their national registers and which the EBA shall use for validation purposes.
- 10. The application of the electronic central register of the EBA shall not allow competent authorities to insert a natural or legal person more than once for the same type of natural or legal person having the same authorisation or registration date.
- 11. The application of the electronic central register of the EBA shall allow competent authorities to insert an agent more than once in the register if the agent provides payment services on behalf of more than one natural or legal person. Each insertion shall be treated as a separate record.

Article 10 – *Information for agents*

- 1. The EBA and the competent authorities shall ensure that agents inserted in the electronic central register of the EBA are linked to the natural or legal person on behalf of which they provide payment services.
- 2. When a natural or legal person, which has agents providing payment services on its behalf, has its status of authorisation or registration changed from 'authorised' or 'registered' to 'withdrawn', the status of the agents linked to the withdrawn institution shall also be changed from 'active' to 'inactive'.

Article 11 – Responsibility of competent authorities

- 1. Competent authorities shall be responsible for the information manually inserted in or automatically transmitted to the application of the electronic central register of the EBA about the natural or legal persons authorised or registered by them, as well as the agents and service providers carrying out services under points (i) and (ii) of point (k) and point (l) of Article 3 of Directive (EU) 2015/2366 listed in their national public registers.
- 2. The application of the EBA Register shall allow internal users and applications of the national public registers to insert or modify the information for which their respective competent authority is responsible.
- 3. Competent authorities shall not be able to modify the information for which other competent authorities are responsible.
- 4. Competent authorities shall not be able to insert information for payment institutions, natural or legal persons benefiting from an exemption pursuant to Article 32 of Directive (EU) 2015/2366 and their agents, account information service providers, the institutions referred to in points (4) to (23) of Article 2(5) of Directive 2013/36/EU, electronic money institutions, legal persons benefiting from an exemption pursuant to Article 9 of Directive 2009/110/EC and their agents, and service providers carrying out services under points (i) and (ii) of point (k) and point (l) of Article 3 of Directive (EU) 2015/2366, established in another host Member State.



CHAPTER 3 NON-FUNCTIONAL REQUIREMENTS

Article 12 – Safety requirements

- 1. The application data of the electronic central register of the EBA shall be backed up and the backup copies shall be stored for disaster recovery.
- 2. If any security issues are detected, the EBA shall be able to shut down the application of the electronic central register of the EBA and prevent any access to the server immediately.
- 3. The application of the electronic central register of the EBA shall be able to recover itself from crashes without undue delay and to continue its normal operation.
- 4. If the application of the electronic central register of the EBA is down and cannot process batch files transmitted by the competent authorities, the application of the register shall process the last files which were transmitted by each competent authority, when it restores its normal operation.
- 5. The EBA shall notify competent authorities about any failure or down-time of the application of the electronic central register.
- 6. If a failure of the application of the electronic central register of the EBA has affected the processing of a batch file transmitted by a competent authority, the competent authority shall submit a new batch file. If the competent authority is unable to do so, it shall request from the EBA to roll-back the data to the version that was submitted with the last validated batch file prior to the failure.
- 7. The EBA shall develop its register in accordance with the international standards for cyber security.

Article 13 – Availability and performance requirements

- 1. The electronic central register of the EBA shall be able to accommodate the initial set of data currently existing in the public registers maintained by the competent authorities.
- 2. The application of the electronic central register of the EBA shall be able to accommodate an increase in the volume of the information received from competent authorities. This increase shall not affect the availability of the register.
- 3. The electronic central register of the EBA shall have a high level of availability.
- 4. The EBA shall ensure that the electronic central register is available after any failure of the application of the register.
- 5. The automated transmission of information specified in Article 8 shall not affect the availability of the electronic central register of the EBA.
- 6. The EBA shall notify public users of any unavailability of the electronic central register and provide them with information on the reasons for the unavailability and the recovery of the register.
- 7. The EBA shall display the information specified in paragraph (6) on its website.

Article 14 – Maintenance and support requirements

1. The EBA shall monitor the operation of the application of the register, analysing its performance and, where necessary, introducing changes to the application in compliance with the provisions of this Regulation.



- 2. The EBA shall monitor the regular provision and update of information in the electronic central register from the competent authorities.
- 3. The EBA shall review the suitability of the non-functional requirements specified in this Chapter on a regular basis.
- 4. The EBA shall provide support to the competent authorities related to the operation of the electronic central register by introducing a functionality in the application of the register for competent authorities to submit a query. The EBA shall put all queries in a queue.
- 5. The EBA shall respond to the queries referred to in paragraph (4) without undue delay by the end of the day. The EBA shall respond to the queries in order of reception.
- 6. The EBA shall provide a testing environment to the competent authorities and support for this technical environment.
- 7. The EBA shall establish a designated channel for communication of incidents related to the operation of the electronic central register.

Article 15 – Audit trail

- 1. The electronic central register of the EBA shall allow recording of all the information transmitted by competent authorities to the EBA.
- 2. The electronic central register of the EBA shall allow recording of all automated or manual actions performed by the applications of the national public registers or by internal users respectively, as well as the time when these actions were performed.
- 3. The EBA shall be able to access the audit trail of the information contained in the register and all actions performed by the applications of the national public registers or by the internal users.
- 4. The EBA shall be able to extract reports from the audit trail which allow it to monitor and interpret the information transmitted by the competent authorities.

CHAPTER 4

SEARCH, DISPLAY AND DOWNLOAD OF INFORMATION

Article 16 – Search of information

- 1. The electronic central register of the EBA shall allow users of the register to search information in the register through different search criteria including:
 - (a) The type of natural or legal person;
 - (b) The name of the natural or legal person;
 - (c) The national identification number of the natural or legal person;
 - (d) The name of the competent authority responsible for the operation of the national public register;
 - (e) The country where the natural or legal person is established;
 - (f) The city where the natural or legal person is established;
 - (g) The payment and electronic money services provided;



- (h) The host Member State in which the authorised or registered payment institution, electronic money institution or account information service provider provides services or has notified its intention to provide services.
- (i) The payment and electronic money services provided in the host Member State;
- (j) The status of authorisation or registration;
- (k) The date of authorisation or registration;
- (I) The date of withdrawal of authorisation or registration.
- 2. The electronic central register of the EBA shall perform the search of information when at least one of the search criteria is filled in.
- 3. The electronic central register of the EBA shall allow users of the register to use any combination of the criteria specified in paragraph (1) while conducting their search of information.
- 4. The electronic central register of the EBA shall allow users of the register to select the information in items (a), (d), (e) and (j) of paragraph (1) from a drop-down menu.
- 5. The electronic central register of the EBA shall allow users of the register to select the information in items (g), (h) and (i) of paragraph (1) from a multi-select menu.
- 6. The EBA shall ensure that wildcard searches are available for users of the register to increase the breadth of a search by using symbols to replace individual characters and/or words.
- 7. The EBA shall inform the users of the register how to use the symbols referred to in paragraph (6).

Article 17 – Display of information

- 1. The electronic central register of the EBA shall display the search results for all natural and legal persons which meet the search criteria filled in by the user of the register.
- 2. The information displayed for the natural and legal persons shall include:
 - (a) The name of the person;
 - (b) The national identification number of the person;
 - (c) The country where they are established;
 - (d) The city where they are established;
 - (e) The type of natural or legal person;
 - (f) The payment and electronic money services provided.
- 3. When selecting the name of a natural or legal person from the displayed search results, the information specified in the Commission implementing regulation (EU) № .../... (the ITS on the EBA Register) shall be displayed for the respective person, including the latest date and time stamp introduced by the EBA.
- 4. Agents shall be displayed both as a separate record and as part of the record of the natural or legal person on behalf of which they provide payment services.
- 5. The EBA shall accurately display in the electronic central register the information provided by the competent authorities and ensure that the information displayed is complete.



Article 18 – Download of information

- 1. The EBA shall make the content of the electronic central register available for manual and automated download by public users of the register by copying the content to a standardised file.
- 2. The EBA shall update the standardised file referred to in paragraph (1) at least twice a day at pre-agreed intervals. The EBA shall disclose the pre-agreed intervals for such updates.

CHAPTER 6 FINAL PROVISIONS

Article 19 – Entry into force

This Regulation shall enter into force on the twentieth day following that of its publication in the *Official Journal of the European Union*.

This Regulation shall be binding in its entirety and directly applicable in all Member States. Done at Brussels,

For the Commission The President

[For the Commission On behalf of the President

[Position]



5. EBA FINAL Draft implementing technical standards on the details and structure of the information entered by competent authorities in their public registers and notified to the EBA under Article 15(5) of Directive (EU) 2015/2366 (PSD2)



COMMISSION IMPLEMENTING REGULATION (EU) No .../... laying down implementing technical standards with regard to on the details and structure of the information entered by competent authorities in their public registers and notified to the EBA, including the common format and model in which this information is to be provided according to Directive (EU) 2015/2366 of the European Parliament and of the Council

of XXX

THE EUROPEAN COMMISSION,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Directive (EU) 2015/2366 of the European Parliament and of the Council of 25 November 2015 on payment services in the internal market, amending Directives 2002/65/EC, 2009/110/EC and 2013/36/EU and Regulation (EU) No 1093/2010, and repealing Directive 2007/64/EC³ and in particular the third subparagraph of Article 15(5) thereof, Whereas:

- (1) With a view to enhancing transparency in the payments market, a central register containing the list of all payment and electronic money institutions, including their agents and branches, should be established and operated by the European Banking Authority (EBA). The information contained in the register should allow payment service users and other interested parties to easily and unequivocally identify each natural or legal person entered in the register and the territory in which it conducts or intends to conduct activities. They should also be able to identify the payment and electronic money services provided by these natural and legal persons.
- (2) The electronic central register of the EBA should also include service providers excluded from the scope of PSD2 (Directive (EU) 2015/2366) carrying out an activity referred to in points (i) and (ii) of point (k) and point (l) of Article 3 of Directive (EU) 2015/2366 that have notified their respective competent authority pursuant to Article 37(2) or Article 37(3) of PSD2. The information contained in the register about these service providers should, among other things, include a short description of their activities, as provided by competent authorities, which should include information on the underlying payment instrument used and a general description of the service provided, to ensure a consistent interpretation of these exclusions throughout the European Union.
- (3) Given that it is necessary to ensure high level of consumer protection, the information contained in the electronic central register should be presented in a clear, unambiguous and non-misleading way in order to be easily understood by the users of the register. The presentation of the information contained in the register should take into account the national language specificities.
- (4) In order to ensure uniform provision of information, a standardised format of the information contained in the electronic central register should be introduced and made available for competent authorities to use when inserting information in the application of the electronic central register of the EBA.

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³ OJ L 337, 23.12.2015, p. 35.



- (5) This Regulation is based on the draft implementing technical standards submitted by the EBA to the Commission.
- (6) The EBA has conducted open public consultations on the draft implementing technical standards on which this Regulation is based, analysed the potential related costs and benefits and requested the opinion of the Banking Stakeholder Group established in accordance with Article 37 of Regulation (EU) No 1093/2010.

HAS ADOPTED THIS REGULATION:

Article 1 – Natural and legal persons included in the register

The electronic central register of the EBA shall contain information about the following natural and legal persons:

- a) payment institutions;
- b) branches of payment institutions providing services in a Member State other than their home Member State;
- c) agents of payment institutions which provide payment services in the payment institution's home Member State or in a Member State other than its home Member State;
- d) natural or legal persons benefiting from an exemption pursuant to Article 32 of Directive (EU) 2015/2366:
- e) agents of natural or legal persons benefiting from an exemption pursuant to Article 32 of Directive (EU) 2015/2366 which provide payment services in the home Member State of that person;
- f) account information service providers;
- g) branches of account information service providers providing services in a Member State other than their home Member State;
- h) agents of account information service providers;
- i) the institutions referred to in points (4) to (23) of Article 2(5) of Directive 2013/36/EU, if they are entitled under national law to provide payment services;
- i) electronic money institutions;
- k) branches of electronic money institutions providing services in a Member State other than their home Member State:
- l) agents of electronic money institutions which provide payment services in their home Member State or Member State other than their home Member State;
- m) legal persons benefiting from an exemption pursuant to Article 9 of Directive 2009/110/EC;
- n) agents of legal persons benefiting from an exemption pursuant to Article 9 of Directive 2009/110/EC which provide payment services in the home Member State of that person;
- o) service providers carrying out services under points (i) and (ii) of point (k) and point (l) of Article 3 of Directive (EU) 2015/2366.



Article 2 – Information on payment institutions

Where competent authorities notify the EBA of the information on payment institutions contained in their respective national public registers, they shall provide the information in the format specified in Table 1 of Annex I.

Article 3 – Information on natural or legal persons benefiting from an exemption pursuant to Article 32 of Directive (EU) 2015/2366

Where competent authorities notify the EBA of the information on natural or legal persons benefiting from an exemption pursuant to Article 32 of Directive (EU) 2015/2366 contained in their respective national public registers, they shall provide the information in the format specified in Table 2 of Annex I.

Article 4 – Information on account information service providers

Where competent authorities notify the EBA of the information on account information service providers contained in their respective national public registers, they shall provide the information in the format specified in Table 3 of Annex I.

Article 5 – Information on electronic money institutions

Where competent authorities notify the EBA of the information on authorised electronic money institutions contained in their respective national public registers, they shall provide the information in the format specified in Table 4 of Annex I.

Article 6 – Information on legal persons benefiting from an exemption pursuant to Article 9 of Directive 2009/110/EC

Where competent authorities notify the EBA of the information on legal persons benefiting from an exemption pursuant to Article 9 of Directive 2009/110/EC contained in their respective national public registers, they shall provide the information in the format specified in Table 5 of Annex I.

Article 7 – Information on agents

Where competent authorities notify the EBA of the information on agents of domestic payment institutions, account information service providers and electronic money institutions which provide payment services in their home Member State or a Member State other than their home Member State, and domestic agents of natural or legal person benefiting from an exemption pursuant to Article 32 of Directive (EU) 2015/2366 and legal persons benefiting from an exemption pursuant to Article 9 of Directive 2009/110/EC contained in their respective national public registers, the competent authorities shall provide the information in the format specified in Table 6 of Annex I.

Article 8 – Information on institutions referred to in points (4) to (23) of Article 2(5) of Directive 2013/36/EU

Where competent authorities notify the EBA of the information on institutions referred to in points (4) to (23) of Article 2(5) of Directive 2013/36/EU that are entitled under national law to provide payment services contained in their respective national public registers, they shall provide the information in the format specified in Table 7 of Annex I.



Article 9 – Information on service providers carrying out services under points (i) and (ii) of point (k) and point (l) of Article 3 of Directive (EU) 2015/2366

Where competent authorities notify the EBA of the information on service providers carrying out services under points (i) and (ii) of point (k) and point (l) of Article 3 of Directive (EU) 2015/2366 contained in their respective national public registers, they shall provide the information in the format specified in Table 8 of Annex I.

Article 10 – Entry into force

This Regulation shall enter into force on the twentieth day following that of its publication in the Official Journal of the European Union.

This Regulation shall be binding in its entirety and directly applicable in all Member States.

Done at Brussels,

For the Commission The President

On behalf of the President

[Position]



5.1 ANNEX

Tables with the format of the information under Articles 2-9

Table 1 – Format of the information on payment institutions

Row	Field	Maximum length	Format
11000	riciu		Tomat
		of the field	
1	Type of natural or legal	Pre-defined text	Pre-defined option – 'Payment institution'
	person		
2	Name of the payment	Text (250 characters)	The official name of the payment institution should be entered in free text using any of the following
	institution		language character sets: Hellenic Alphabet, Cyrillic and Latin. The name of the institution should be
			provided in the national language of the respective Member State. Countries that use the Hellenic
			Alphabet or Cyrillic script should also provide either a transcription of the institution's name into the Latin
			alphabet, or a translation or an alternative name of the institution in another language based on the Latin
			alphabet.
			In countries where there is more than one official national language, all official names of the institution
			must be entered. The names must be separated by a '/' character.
3	Commercial name of the	Text (250 characters)	The commercial name of the payment institution should be entered in free text using any of the following
	payment institution		language character sets: Hellenic Alphabet, Cyrillic and Latin. Countries that use the Hellenic Alphabet or
			Cyrillic script should also provide either a transcription of the institution's commercial name into the Latin
			alphabet, or a translation or an alternative commercial name of the institution in another language based
			on the Latin alphabet.
			If the payment institution uses more than one commercial name, all of the commercial names of the
			institution could be entered. These names must be separated by a '/' character.
			This field is optional for competent authorities to provide.
4	Address of the payment		The address of the payment institution's head office should be entered in free text using any of the
	institution's head office		following language character sets: Hellenic Alphabet, Cyrillic and Latin. The address should be provided in
			the national language of the respective Member State. Countries that use the Hellenic Alphabet or Cyrillic
			script should also provide a transcription into the Latin alphabet or a common English name.
			In countries where there is more than one official national language, the address should be provided in at
			least one official language of the jurisdiction. If the address is provided in more than one official national
			language, they should be separated by a '/' character.
4.1.	Country	Pre-defined text	The Member States of the EU and the other EEA countries:



		(options)	Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Iceland, Ireland, Italy, Latvia, Liechtenstein, Lithuania, Luxembourg, Malta, Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, United Kingdom.
4.2.	City	Text (100 characters)	· · · · · · · · · · · · · · · · · · ·
4.3.	Address	Text (50 characters per address line)	
4.4.	Postcode	Text (35 characters)	
5	National identification number of the payment institution	Alphanumeric (50 characters)	The national identification number could be one of the following codes used by the home CA that provides information to the EBA: National identification number for natural and legal persons used in the respective Member State; Legal entity identifier – a code that allows legally distinct entities that engage in financial transactions to be uniquely identified; Authorisation number – a number or code appointed to an authorised payment institution by the competent authority of a Member State in the territory of which the entity has been established; Registration number – a number or code used by the competent authority of a Member State in its national public register; Other equivalent means of identification – any means of identification of natural and legal persons used by the competent authority in its national public register.
6	The name of the competent authority responsible for the operation of the national public register	Text (100 characters)	The name of the competent authority which has provided the information about the payment institution to the EBA and is accountable for this information. The name of the competent authority should be selected from a pre-defined list.
7	The payment services for which the payment institution has been authorised	Multiple pre-defined options (between 1 and 13 options)	The payment services from a pre-defined list: 1. Services enabling cash to be placed on a payment account as well as all the operations required for operating a payment account 2. Services enabling cash withdrawals from a payment account as well as all the operations required for operating a payment account 3. Execution of payment transactions, including transfers of funds on a payment account with the user's payment provider or with another payment service provider: a) execution of direct debits, including one-off direct debits b) execution of payment transactions through a payment card or a similar device c) execution of credit transfers, including standing orders 4. Execution of payment transactions where the funds are covered by a credit line for a payment service user:



			a) a execution of direct debits, including one-off direct debits
			b) \square execution of payment transactions through a payment card or a similar device
			c) \square execution of credit transfers, including standing orders
			5. Issuing of payment instruments
			acquiring of payment transactions
			6. Money remittance
			7. Payment initiation services
			8. Account information services
8	Current authorisation	Text (10 characters)	Current authorisation status of the payment institution chosen from a pre-defined list:
	status of the payment	(======================================	1. Authorised
	institution		2. Withdrawn
9	Date of authorisation	Numeric (8	The date of authorisation of the payment institution. Depending on the practice of the respective
		characters)	competent authority, this date could be either the date when the payment institution was authorised by
			the competent authority or the date when it was included in its national public register.
10	Date of withdrawal (where	Numeric (8	The date of withdrawal of authorisation of the payment institution. This is the date when the authorisation
	applicable)	characters)	of the payment institution was withdrawn.
11	Host Member States	Multiple pre-defined	Host Member States where the payment institution provides or intends to provide payment services
	where the payment	options (up to 31	through the freedom to provide services and the respective payment services that were notified to the
	institution provides or	options, which have	host competent authority:
	intends to provide	up to 13 pre-defined	□ Austria:
	payment services through	sub-options)	1. Services enabling cash to be placed on a payment account as well as all the operations required
	the freedom to provide		for operating a payment account
	services and the		2. Services enabling cash withdrawals from a payment account as well as all the operations
	respective payment		required for operating a payment account
	services that were notified		3. Execution of payment transactions, including transfers of funds on a payment account with the
	to the host competent		user's payment provider or with another payment service provider:
	authority		a) a execution of direct debits, including one-off direct debits
	,		b) a execution of payment transactions through a payment card or a similar device
			c) cexecution of credit transfers, including standing orders
			4. Execution of payment transactions where the funds are covered by a credit line for a payment
			service user:
			a) a execution of direct debits, including one-off direct debits
			b) a execution of payment transactions through a payment card or a similar device
			c) cexecution of credit transfers, including standing orders
			5. Issuing of payment instruments



	1	
		acquiring of payment transactions
		6. Money remittance
		7. Payment initiation services
		8. Account information services
		□ Belgium:
		1. Services enabling cash to be placed on a payment account as well as all the operations required
		for <u>op</u> erating a payment account
		2. \square Services enabling cash withdrawals from a payment account as well as all the operations
		required for operating a payment account
		3. Execution of payment transactions, including transfers of funds on a payment account with the
		user's payment provider or with another payment service provider:
		a) a execution of direct debits, including one-off direct debits
		b) are execution of payment transactions through a payment card or a similar device
		c) cexecution of credit transfers, including standing orders
		4. Execution of payment transactions where the funds are covered by a credit line for a payment
		service user:
		a) a execution of direct debits, including one-off direct debits
		b) are execution of payment transactions through a payment card or a similar device
		c) cexecution of credit transfers, including standing orders
		5. Issuing of payment instruments
		acquiring of payment transactions
		6. Money remittance
		7. Payment initiation services
		8. Account information services
		6. Account information services
		□ Bulgaria:
		1. Services enabling cash to be placed on a payment account as well as all the operations required
		for operating a payment account
		2. Services enabling cash withdrawals from a payment account as well as all the operations
		required for operating a payment account
		3. Execution of payment transactions, including transfers of funds on a payment account with the
		user's payment provider or with another payment service provider:
		a) \(\subseteq \text{ execution of direct debits, including one-off direct debits} \)
		b) Lexecution of payment transactions through a payment card or a similar device



	c) cexecution of credit transfers, including standing orders
	4. Execution of payment transactions where the funds are covered by a credit line for a payment
	service user:
	a) 🔲 execution of direct debits, including one-off direct debits
	b) 🔲 execution of payment transactions through a payment card or a similar device
	c) Lexecution of credit transfers, including standing orders
	5. Issuing of payment instruments
	acquiring of payment transactions
	6. Money remittance
	7. Payment initiation services
	8. Account information services
	□ Croatia:
	1. Services enabling cash to be placed on a payment account as well as all the operations required
	for operating a payment account
	2. \square Services enabling cash withdrawals from a payment account as well as all the operations
	required for operating a payment account
	3. Execution of payment transactions, including transfers of funds on a payment account with the
	user's payment provider or with another payment service provider:
	a) a execution of direct debits, including one-off direct debits
	b) \square execution of payment transactions through a payment card or a similar device
	c) \square execution of credit transfers, including standing orders
	4. Execution of payment transactions where the funds are covered by a credit line for a payment
	service user:
	a) a execution of direct debits, including one-off direct debits
	b) are execution of payment transactions through a payment card or a similar device
	c) are execution of credit transfers, including standing orders
	5. Issuing of payment instruments
	acquiring of payment transactions
	6. Money remittance
	7. Payment initiation services
	8. Account information services
	□ Cyprus:
	1. Services enabling cash to be placed on a payment account as well as all the operations required



	for operating a payment account
	2. \square Services enabling cash withdrawals from a payment account as well as all the operations
	required for operating a payment account
	3. Execution of payment transactions, including transfers of funds on a payment account with the
	user's payment provider or with another payment service provider:
	a) aexecution of direct debits, including one-off direct debits
	b) are execution of payment transactions through a payment card or a similar device
	c) cexecution of credit transfers, including standing orders
	4. Execution of payment transactions where the funds are covered by a credit line for a payment
	service user:
	a) a execution of direct debits, including one-off direct debits
	b) are execution of payment transactions through a payment card or a similar device
	c) cexecution of credit transfers, including standing orders
	5. Issuing of payment instruments
	acquiring of payment transactions
	6. Money remittance
	7. Payment initiation services
	8. Account information services
	☐ Czech Republic:
	1. Services enabling cash to be placed on a payment account as well as all the operations required
	for operating a payment account
	2. Services enabling cash withdrawals from a payment account as well as all the operations
	required for operating a payment account
	3. Execution of payment transactions, including transfers of funds on a payment account with the
	user's payment provider or with another payment service provider:
	a) aexecution of direct debits, including one-off direct debits
	b) are execution of payment transactions through a payment card or a similar device
	c) cexecution of credit transfers, including standing orders
	4. Execution of payment transactions where the funds are covered by a credit line for a payment
	service user:
	a) a execution of direct debits, including one-off direct debits
	b) execution of payment transactions through a payment card or a similar device
	c) cexecution of credit transfers, including standing orders
	5. Issuing of payment instruments



	☐ acquiring of payment transactions
	6. Money remittance
	7. Payment initiation services
	8. Account information services
	8. Account mornia don services
	☐ Denmark:
	1. Services enabling cash to be placed on a payment account as well as all the operations required
	for operating a payment account
	2. Services enabling cash withdrawals from a payment account as well as all the operations
	required for operating a payment account
	3. Execution of payment transactions, including transfers of funds on a payment account with the
	user's payment provider or with another payment service provider:
	a) \bigsqcup execution of direct debits, including one-off direct debits
	b) 🔲 execution of payment transactions through a payment card or a similar device
	c) Lexecution of credit transfers, including standing orders
	4. Execution of payment transactions where the funds are covered by a credit line for a payment
	service user:
	a) a execution of direct debits, including one-off direct debits
	b) \square execution of payment transactions through a payment card or a similar device
	c) cexecution of credit transfers, including standing orders
	5. Issuing of payment instruments
	acquiring of payment transactions
	6. Money remittance
	7. Payment initiation services
	8. Account information services
	□ Estonia:
	1. Services enabling cash to be placed on a payment account as well as all the operations required
	for operating a payment account
	2. Services enabling cash withdrawals from a payment account as well as all the operations
	required for operating a payment account
	3. Execution of payment transactions, including transfers of funds on a payment account with the
	user's payment provider or with another payment service provider:
	a) execution of direct debits, including one-off direct debits
	b) Lexecution of payment transactions through a payment card or a similar device



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		c) cexecution of credit transfers, including standing orders
		4. Execution of payment transactions where the funds are covered by a credit line for a payment
		service user:
		a) a execution of direct debits, including one-off direct debits
		b) are execution of payment transactions through a payment card or a similar device
		c) are execution of credit transfers, including standing orders
		5. Issuing of payment instruments
		acquiring of payment transactions
		6. Money remittance
		7. Payment initiation services
		8. Account information services
		☐ Finland:
		1. Services enabling cash to be placed on a payment account as well as all the operations required
		for operating a payment account
		2. Services enabling cash withdrawals from a payment account as well as all the operations
		required for operating a payment account
		3. Execution of payment transactions, including transfers of funds on a payment account with the
		user's payment provider or with another payment service provider:
		a) a execution of direct debits, including one-off direct debits
		b) axecution of payment transactions through a payment card or a similar device
		c) ceccution of payment transfers, including standing orders
		4. Execution of payment transactions where the funds are covered by a credit line for a payment
		service user:
		a) a execution of direct debits, including one-off direct debits
		b) execution of payment transactions through a payment card or a similar device
		c) ceccution of payment transactions through a payment card of a similar device
		5. Issuing of payment instruments
		acquiring of payment transactions
		6. Money remittance
		7. Payment initiation services
		8. Account information services
		6. L. Account information services
		☐ France:
		1. Services enabling cash to be placed on a payment account as well as all the operations required
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	for operating a payment account
	2. \square Services enabling cash withdrawals from a payment account as well as all the operations
	required for operating a payment account
	3. Execution of payment transactions, including transfers of funds on a payment account with the
	user's payment provider or with another payment service provider:
	a) a execution of direct debits, including one-off direct debits
	b) are execution of payment transactions through a payment card or a similar device
	c) are execution of credit transfers, including standing orders
	4. Execution of payment transactions where the funds are covered by a credit line for a payment
	service user:
	a) a execution of direct debits, including one-off direct debits
	b) are execution of payment transactions through a payment card or a similar device
	c) are execution of credit transfers, including standing orders
	5. Issuing of payment instruments
	acquiring of payment transactions
	6. Money remittance
	7. Payment initiation services
	8. Account information services
	Germany:
	1. Services enabling cash to be placed on a payment account as well as all the operations required
	for operating a payment account
	2. Services enabling cash withdrawals from a payment account as well as all the operations
	required for operating a payment account
	3. Execution of payment transactions, including transfers of funds on a payment account with the
	user's payment provider or with another payment service provider:
	a) a execution of direct debits, including one-off direct debits
	b) are execution of payment transactions through a payment card or a similar device
	c) are execution of credit transfers, including standing orders
	4. Execution of payment transactions where the funds are covered by a credit line for a payment
	service user:
	a) a execution of direct debits, including one-off direct debits
	b) are execution of payment transactions through a payment card or a similar device
	c) are execution of credit transfers, including standing orders
	5. Issuing of payment instruments



	acquiring of payment transactions
	6. Money remittance
	7. Payment initiation services
	8. Account information services
	Greece:
	1. Services enabling cash to be placed on a payment account as well as all the operations required
	for operating a payment account
	2. La Services enabling cash withdrawals from a payment account as well as all the operations
	required for operating a payment account
	3. Execution of payment transactions, including transfers of funds on a payment account with the
	user's payment provider or with another payment service provider:
	a) \sqsubseteq execution of direct debits, including one-off direct debits
	b) execution of payment transactions through a payment card or a similar device
	c) Lexecution of credit transfers, including standing orders
	4. Execution of payment transactions where the funds are covered by a credit line for a payment
	service user:
	a) execution of direct debits, including one-off direct debits
	b) execution of payment transactions through a payment card or a similar device
	c) execution of credit transfers, including standing orders
	5. La Issuing of payment instruments
	acquiring of payment transactions
	6. Money remittance
	7. Payment initiation services
	8. Account information services
	Hungary:
	1. Services enabling cash to be placed on a payment account as well as all the operations required
	for operating a payment account
	2. Services enabling cash withdrawals from a payment account as well as all the operations
	required for operating a payment account
	3. Execution of payment transactions, including transfers of funds on a payment account with the
	user's payment provider or with another payment service provider:
	a) Lexecution of direct debits, including one-off direct debits
	b) Lexecution of payment transactions through a payment card or a similar device



c) cexecution of credit transfers, including standing orders
4. Execution of payment transactions where the funds are covered by a credit line for a payment
service user:
a) a execution of direct debits, including one-off direct debits
b) are execution of payment transactions through a payment card or a similar device
c) are execution of credit transfers, including standing orders
5. Issuing of payment instruments
acquiring of payment transactions
6. Money remittance
7. Payment initiation services
8. Account information services
□ Iceland:
1. Services enabling cash to be placed on a payment account as well as all the operations required
for operating a payment account
2. Services enabling cash withdrawals from a payment account as well as all the operations
required for operating a payment account
3. Execution of payment transactions, including transfers of funds on a payment account with the
user's payment provider or with another payment service provider:
a) a execution of direct debits, including one-off direct debits
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c) cexecution of credit transfers, including standing orders
4. Execution of payment transactions where the funds are covered by a credit line for a payment
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b) a execution of payment transactions through a payment card or a similar device
c) a execution of credit transfers, including standing orders
5. Issuing of payment instruments
acquiring of payment transactions
6. Money remittance
7. Payment initiation services
8. Account information services
or in Account information services
☐ Ireland:
1. Services enabling cash to be placed on a payment account as well as all the operations required



	for operating a payment account
	2. Services enabling cash withdrawals from a payment account as well as all the operations
	required for operating a payment account
	3. Execution of payment transactions, including transfers of funds on a payment account with the
	user's payment provider or with another payment service provider:
	a) Legion execution of direct debits, including one-off direct debits
	b) 🔲 execution of payment transactions through a payment card or a similar device
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	service user:
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	b) \square execution of payment transactions through a payment card or a similar device
	c) cexecution of credit transfers, including standing orders
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	acquiring of payment transactions
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	7. Payment initiation services
	8. Account information services
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	□ Italy:
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	for <u>op</u> erating a payment account
	2. Laservices enabling cash withdrawals from a payment account as well as all the operations
	required for operating a payment account
	3. Execution of payment transactions, including transfers of funds on a payment account with the
	use <u>r's</u> payment provider or with another payment service provider:
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	b) 🔲 execution of payment transactions through a payment card or a similar device
	c) cexecution of credit transfers, including standing orders
	4. Execution of payment transactions where the funds are covered by a credit line for a payment
	service user:
	a) a execution of direct debits, including one-off direct debits
	b) \square execution of payment transactions through a payment card or a similar device
	c) cexecution of credit transfers, including standing orders
	5. Issuing of payment instruments



	acquiring of payment transactions
	6. Money remittance
	7. Payment initiation services
	8. Account information services
	□ Latvia:
	1. Services enabling cash to be placed on a payment account as well as all the operations required
	for operating a payment account
	2. \square Services enabling cash withdrawals from a payment account as well as all the operations
	required for operating a payment account
	3. Execution of payment transactions, including transfers of funds on a payment account with the
	user's payment provider or with another payment service provider:
	a) aexecution of direct debits, including one-off direct debits
	b) \square execution of payment transactions through a payment card or a similar device
	c) cexecution of credit transfers, including standing orders
	4. Execution of payment transactions where the funds are covered by a credit line for a payment
	service user:
	a) a execution of direct debits, including one-off direct debits
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	c) Legion of credit transfers, including standing orders
	5. 🔲 Issuing of payment instruments
	acquiring of payment transactions
	6. 🔲 Money remittance
	7. 🔛 Payment initiation services
	8. Account information services
	Liechtenstein:
	1. Services enabling cash to be placed on a payment account as well as all the operations required
	for operating a payment account
	2. \square Services enabling cash withdrawals from a payment account as well as all the operations
	required for operating a payment account
	3. Execution of payment transactions, including transfers of funds on a payment account with the
	user's payment provider or with another payment service provider:
	a) Lexecution of direct debits, including one-off direct debits
	b) Lexecution of payment transactions through a payment card or a similar device



	c) cexecution of credit transfers, including standing orders
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	service user:
	a) a execution of direct debits, including one-off direct debits
	b) \square execution of payment transactions through a payment card or a similar device
	c) are execution of credit transfers, including standing orders
	5. Issuing of payment instruments
	acquiring of payment transactions
	6. Money remittance
	7. Payment initiation services
	8. Account information services
	☐ Lithuania:
	1. Services enabling cash to be placed on a payment account as well as all the operations required
	for operating a payment account
	2. Services enabling cash withdrawals from a payment account as well as all the operations
	required for operating a payment account
	3. Execution of payment transactions, including transfers of funds on a payment account with the
	user's payment provider or with another payment service provider:
	a) a execution of direct debits, including one-off direct debits
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	c) execution of credit transfers, including standing orders
	4. Execution of payment transactions where the funds are covered by a credit line for a payment
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	a) a execution of direct debits, including one-off direct debits
	b) are execution of payment transactions through a payment card or a similar device
	c) execution of credit transfers, including standing orders
	5. Issuing of payment instruments
	acquiring of payment transactions
	6. Money remittance
	7. Payment initiation services
	8. Account information services
	☐ Luxembourg:
	1. Services enabling cash to be placed on a payment account as well as all the operations required



	for operating a payment account
	2. \square Services enabling cash withdrawals from a payment account as well as all the operations
	required for operating a payment account
	3. Execution of payment transactions, including transfers of funds on a payment account with the
	user's payment provider or with another payment service provider:
	a) a execution of direct debits, including one-off direct debits
	b) \square execution of payment transactions through a payment card or a similar device
	c) are execution of credit transfers, including standing orders
	4. Execution of payment transactions where the funds are covered by a credit line for a payment
	service user:
	a) a execution of direct debits, including one-off direct debits
	b) are execution of payment transactions through a payment card or a similar device
	c) cexecution of credit transfers, including standing orders
	5. Issuing of payment instruments
	☐ acquiring of payment transactions
	6. Money remittance
	7. Payment initiation services
	8. Account information services
	☐ Malta:
	1. Services enabling cash to be placed on a payment account as well as all the operations required
	for operating a payment account
	2. \square Services enabling cash withdrawals from a payment account as well as all the operations
	required for operating a payment account
	3. Execution of payment transactions, including transfers of funds on a payment account with the
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	b) 🔲 execution of payment transactions through a payment card or a similar device
	c) Lexecution of credit transfers, including standing orders
	4. Execution of payment transactions where the funds are covered by a credit line for a payment
	service user:
	a) 🔲 execution of direct debits, including one-off direct debits
	b) \bigsqcup execution of payment transactions through a payment card or a similar device
	c) \bigsqcup execution of credit transfers, including standing orders
	5. LIssuing of payment instruments



	☐ acquiring of payment transactions
	6. Money remittance
	7. Payment initiation services
	8. Account information services
	o. — Account morniduon services
	□ Netherlands:
	1. Services enabling cash to be placed on a payment account as well as all the operations required
	for operating a payment account
	2. Services enabling cash withdrawals from a payment account as well as all the operations
	required for operating a payment account
	3. Execution of payment transactions, including transfers of funds on a payment account with the
	user's payment provider or with another payment service provider:
	a) \bigsqcup execution of direct debits, including one-off direct debits
	b) 🔲 execution of payment transactions through a payment card or a similar device
	c) Lexecution of credit transfers, including standing orders
	4. Execution of payment transactions where the funds are covered by a credit line for a payment
	service user:
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	b) \bigsqcup execution of payment transactions through a payment card or a similar device
	c) \sqsubseteq execution of credit transfers, including standing orders
	5. 🔲 Issuing of payment instruments
	acquiring of payment transactions
	6. Money remittance
	7. Payment initiation services
	8. Account information services
	□ Norway:
	1. Services enabling cash to be placed on a payment account as well as all the operations required
	for operating a payment account
	2. Services enabling cash withdrawals from a payment account as well as all the operations
	required for operating a payment account
	3. Execution of payment transactions, including transfers of funds on a payment account with the
	user's payment provider or with another payment service provider:
	a) a execution of direct debits, including one-off direct debits
	b) axecution of payment transactions through a payment card or a similar device



c) cexecution of credit transfers, including standing orders
4. Execution of payment transactions where the funds are covered by a credit line for a payment
service user:
a) \bigsqcup execution of direct debits, including one-off direct debits
b) \bigsqcup execution of payment transactions through a payment card or a similar device
c) \bigsqcup execution of credit transfers, including standing orders
5. Issuing of payment instruments
acquiring of payment transactions
6. Money remittance
7. Payment initiation services
8. Account information services
Poland:
1. Services enabling cash to be placed on a payment account as well as all the operations required
for operating a payment account
2. \square Services enabling cash withdrawals from a payment account as well as all the operations
required for operating a payment account
3. Execution of payment transactions, including transfers of funds on a payment account with the
use <u>r's</u> payment provider or with another payment service provider:
a) a execution of direct debits, including one-off direct debits
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4. Execution of payment transactions where the funds are covered by a credit line for a payment
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a) a execution of direct debits, including one-off direct debits
b) \square execution of payment transactions through a payment card or a similar device
c) cexecution of credit transfers, including standing orders
5. Issuing of payment instruments
acquiring of payment transactions
6. Money remittance
7. Payment initiation services
8. Account information services
☐ Portugal:
1. Services enabling cash to be placed on a payment account as well as all the operations required



	for operating a payment account
	2. Services enabling cash withdrawals from a payment account as well as all the operations
	required for operating a payment account
	3. Execution of payment transactions, including transfers of funds on a payment account with the
	user's payment provider or with another payment service provider:
	a) Lee execution of direct debits, including one-off direct debits
	b) 🔲 execution of payment transactions through a payment card or a similar device
	c) Lexecution of credit transfers, including standing orders
	4. Execution of payment transactions where the funds are covered by a credit line for a payment
	service user:
	a) aexecution of direct debits, including one-off direct debits
	b) \square execution of payment transactions through a payment card or a similar device
	c) cexecution of credit transfers, including standing orders
	5. Issuing of payment instruments
	acquiring of payment transactions
	6. Money remittance
	7. Payment initiation services
	8. Account information services
	□ Romania:
	1. \square Services enabling cash to be placed on a payment account as well as all the operations required
	for operating a payment account
	2. Services enabling cash withdrawals from a payment account as well as all the operations
	required for operating a payment account
	3. Execution of payment transactions, including transfers of funds on a payment account with the
	user's payment provider or with another payment service provider:
	a) a execution of direct debits, including one-off direct debits
	b) are execution of payment transactions through a payment card or a similar device
	c) are execution of credit transfers, including standing orders
	4. Execution of payment transactions where the funds are covered by a credit line for a payment
	service user:
	a) a execution of direct debits, including one-off direct debits
	b) a execution of payment transactions through a payment card or a similar device
	c) a execution of credit transfers, including standing orders
	 5. Issuing of payment instruments



		☐ acquiring of payment transactions
		6. Money remittance
		7. Payment initiation services
		8. Account information services
		□ Slovakia:
		1. \square Services enabling cash to be placed on a payment account as well as all the operations required
		for operating a payment account
		2. \square Services enabling cash withdrawals from a payment account as well as all the operations
		required for operating a payment account
		3. Execution of payment transactions, including transfers of funds on a payment account with the
		use <u>r's</u> payment provider or with another payment service provider:
		a) \bigsqcup execution of direct debits, including one-off direct debits
		b) 🔲 execution of payment transactions through a payment card or a similar device
		c) Lexecution of credit transfers, including standing orders
		4. Execution of payment transactions where the funds are covered by a credit line for a payment
		service user:
		a) 🔲 execution of direct debits, including one-off direct debits
		b) 🔲 execution of payment transactions through a payment card or a similar device
		c) Lexecution of credit transfers, including standing orders
		5. 🔲 Issuing of payment instruments
		acquiring of payment transactions
		6. Money remittance
		7. 🔲 Payment initiation services
		8. Account information services
		□ Slovenia:
		1. Services enabling cash to be placed on a payment account as well as all the operations required
		for operating a payment account
		2. Services enabling cash withdrawals from a payment account as well as all the operations
		required for operating a payment account
		3. Execution of payment transactions, including transfers of funds on a payment account with the
1		user's payment provider or with another payment service provider:
		a) \square execution of direct debits, including one-off direct debits
		b) execution of direct debits, including one-on direct debits b) execution of payment transactions through a payment card or a similar device
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	c) are execution of credit transfers, including standing orders
	4. Execution of payment transactions where the funds are covered by a credit line for a payment
	service user:
	a) a execution of direct debits, including one-off direct debits
	b) are execution of payment transactions through a payment card or a similar device
	c) are execution of credit transfers, including standing orders
	5. Issuing of payment instruments
	acquiring of payment transactions
	6. Money remittance
	7. Payment initiation services
	8. Account information services
	□ Spain:
	1. Services enabling cash to be placed on a payment account as well as all the operations required
	for operating a payment account
	2. Services enabling cash withdrawals from a payment account as well as all the operations
	required for operating a payment account
	3. Execution of payment transactions, including transfers of funds on a payment account with the
	user's payment provider or with another payment service provider:
	a) a execution of direct debits, including one-off direct debits
	b) a execution of payment transactions through a payment card or a similar device
	c) = execution of credit transfers, including standing orders
	4. Execution of payment transactions where the funds are covered by a credit line for a payment
	service user:
	a) a execution of direct debits, including one-off direct debits
	b) a execution of payment transactions through a payment card or a similar device
	c) = execution of credit transfers, including standing orders
	5. Issuing of payment instruments
	acquiring of payment transactions
	6. Money remittance
	7. Payment initiation services
	8. Account information services
	□ Sweden:
	1. Services enabling cash to be placed on a payment account as well as all the operations required



	for operating a payment account
	2. \square Services enabling cash withdrawals from a payment account as well as all the operations
	required for operating a payment account
	3. Execution of payment transactions, including transfers of funds on a payment account with the
	user's payment provider or with another payment service provider:
	a) a execution of direct debits, including one-off direct debits
	b) a execution of payment transactions through a payment card or a similar device
	c) cexecution of credit transfers, including standing orders
	4. Execution of payment transactions where the funds are covered by a credit line for a payment
	service user:
	a) a execution of direct debits, including one-off direct debits
	b) a execution of payment transactions through a payment card or a similar device
	c) cexecution of credit transfers, including standing orders
	5. Issuing of payment instruments
	☐ acquiring of payment transactions
	6. Money remittance
	7. Payment initiation services
	8. Account information services
	United Kingdom:
	1. Services enabling cash to be placed on a payment account as well as all the operations required
	for operating a payment account
	2. Services enabling cash withdrawals from a payment account as well as all the operations
	required for operating a payment account
	3. Execution of payment transactions, including transfers of funds on a payment account with the
	user's payment provider or with another payment service provider:
	a) a execution of direct debits, including one-off direct debits
	b) \square execution of payment transactions through a payment card or a similar device
	c) \square execution of credit transfers, including standing orders
	4. Execution of payment transactions where the funds are covered by a credit line for a payment
	service user:
	a) we execution of direct debits, including one-off direct debits
	b) \square execution of payment transactions through a payment card or a similar device
	c) \square execution of credit transfers, including standing orders
	5. LIssuing of payment instruments



			☐ acquiring of payment transactions
			6. Money remittance
			7. Payment initiation services
			8. Account information services
12	Name of the branch of the	Text (up to 200	The official name of the branch used in the register should be either the name of the payment institution
	payment institution	characters)	or the designated name of the respective branch. It should be entered in free text using any of the
	established in a Member		following language character sets: Hellenic Alphabet, Cyrillic and Latin. The name of the branch should be
	State other than the home		provided in the national language of the respective Member State. Countries that use the Hellenic
	Member State of the		Alphabet or Cyrillic script should also provide either a transcription of the name or the trade name of the
	payment institution		branch into the Latin alphabet, or a translation or an alternative name of the branch in another language
			based on the Latin alphabet.
			In countries where there is more than one official national language, all official names of the branch must
			be entered. The names must be separated by a '/' character.
13	The address of the		The address of the principal branch of the payment institution in the host Member State should be entered
	principal branch of the		in free text using any of the following language character sets: Hellenic Alphabet, Cyrillic and Latin.
	payment institution in the		Countries that use the Hellenic Alphabet or Cyrillic script should also provide a transcription into the Latin
	host Member State		alphabet or a common English name.
			In countries where there is more than one official national language, the address should be provided in at
			least one official language of the jurisdiction. If the address is provided in more than one official national
			language, they should be separated by a '/' character.
13.1.	Country	Pre-defined text	The Member States of the EU and the other EEA countries:
	·	(options)	Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany,
			Greece, Hungary, Iceland, Ireland, Italy, Latvia, Liechtenstein, Lithuania, Luxembourg, Malta, Netherlands,
			Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, United Kingdom.
13.2.	City	Text (100 characters)	
13.3.	Address	Text (50 characters	
		per address line)	
13.4.	Postcode	Text (35 characters)	
14	Host Member States	Multiple pre-defined	Host Member States where the payment institution provides or intends to provide payment services
	where the payment	options (up to 31	through the freedom of establishment via a branch and the respective payment services that were notified
	institution provides or	options, which have	to the host competent authority:
	intends to provide	up to 13 pre-defined	
	payment services through	sub-options)	Same options as row 11 of this table.
	the freedom of		
	establishment via a branch		



and the respective		
payment services that		
were notified to the host		
competent authority		



Table 2 – Format of the information on natural or legal persons benefiting from an exemption pursuant to Article 32 of Directive (EU) 2015/2366

Row	Field	Maximum length	Format
		of the field	
1	Type of natural or legal person	Pre-defined text	Pre-defined option – 'Exempted payment institution'.
2	Name of the exempted payment institution	Text (250 characters)	The official name of the exempted payment institution should be entered in free text using any of the following language character sets: Hellenic Alphabet, Cyrillic and Latin. The name of the institution should be provided in the national language of the respective Member State. Countries that use the Hellenic Alphabet or Cyrillic script should also provide either a transcription of the institution's name into the Latin alphabet, or a translation or an alternative name of the institution in another language based on the Latin alphabet. In countries where there is more than one official national language, all official names of the institution must be entered. The names must be separated by a '/' character.
3	Commercial name of the exempted payment institution	Text (250 characters)	The commercial name of the exempted payment institution should be entered in free text using any of the following language character sets: Hellenic Alphabet, Cyrillic and Latin. Countries that use the Hellenic Alphabet or Cyrillic script should also provide either a transcription of the institution's commercial name into the Latin alphabet, or a translation or an alternative commercial name of the institution in another language based on the Latin alphabet. If the exempted payment institution uses more than one commercial name, all of the commercial names of the institution could be entered. These names must be separated by a '/' character. This field is optional for competent authorities to provide.
4	Address of the exempted payment institution's head office		The address of the exempted payment institution's head office should be entered in free text using any of the following language character sets: Hellenic Alphabet, Cyrillic and Latin. The address should be provided in the national language of the respective Member State. Countries that use the Hellenic Alphabet or Cyrillic script should also provide a transcription into the Latin alphabet or a common English name. In countries where there is more than one official national language, the address should be provided in at least one official language of the jurisdiction. If the address is provided in more than one official national language, they should be separated by a '/' character.
4.1.	Country	Pre-defined text (options)	The Member States of the EU and the other EEA countries: Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Iceland, Ireland, Italy, Latvia, Liechtenstein, Lithuania, Luxembourg, Malta, Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, United Kingdom.
4.2.	City	Text (100 characters)	
4.3.	Address	Text (50 characters per address line)	



4.4.	Postcode	Text (35 characters)	
5	National identification number of the exempted payment institution	Alphanumeric (50 characters)	The national identification number could be one of the following codes used by the home CA that provides information to the EBA: National identification number for natural and legal persons used in the respective Member State; Legal entity identifier – a code that allows legally distinct entities that engage in financial transactions to be uniquely identified; Registration number – a number or code used by the competent authority of a Member State in its national public register; Other equivalent means of identification – any means of identification of natural and legal persons used by the competent authority in its national public register.
6	The name of the competent authority responsible for the operation of the national public register	Text (100 characters)	The name of the competent authority which has provided the information about the exempted payment institution to the EBA and is accountable for this information. The name of the competent authority should be selected from a pre-defined list.
7	The payment services for which the exempted payment institution has been registered	Multiple pre-defined options (between 1 and 13 options)	The payment services from a pre-defined list: 1.
8	Current registration status of the exempted payment	Text (10 characters)	Current registration status of the exempted payment institution status chosen from a pre-defined list: 1. Registered



	institution		2. Withdrawn
9	Date of registration	Numeric (8 characters)	The date of registration of the exempted payment institution. Depending on the practice of the competent authority, this date could be either the date when the exempted payment institution was registered with the competent authority or the date when it was included in the national public register.
10	Date of withdrawal (where	,	The date of withdrawal of registration of the exempted payment institution. This is the date when the
	applicable)	characters)	registration of the exempted payment institution was withdrawn.



Table 3 – Format of the information on account information service providers

Row	Field	Maximum length	Format
		of the field	
1	Type of natural or legal person	Pre-defined text	Pre-defined option – 'Account information service provider'.
2	Name of the account information service provider	Text (250 characters)	The official name of the account information service provider should be entered in free text using any of the following language character sets: Hellenic Alphabet, Cyrillic and Latin. The name of the provider should be provided in the national language of the respective Member State. Countries that use the Hellenic Alphabet or Cyrillic script should also provide either a transcription of the provider's name into the Latin alphabet, or a translation or an alternative name of the provider in another language based on the Latin alphabet. In countries where there is more than one official national language, all official names of the provider must be entered. The names must be separated by a '/' character.
3	Commercial name of the account information service provider	Text (250 characters)	The commercial name of the account information service provider should be entered in free text using any of the following language character sets: Hellenic Alphabet, Cyrillic and Latin. Countries that use the Hellenic Alphabet or Cyrillic script should also provide either a transcription of the institution's name into the Latin alphabet, or a translation or an alternative name of the institution in another language based on the Latin alphabet. If the account information service provider uses more than one commercial name, all of the commercial names of the institution could be entered. These names must be separated by a '/' character. This field is optional for competent authorities to provide.
4	Address of the account information service provider's head office		The address of the account information service provider's head office should be entered in free text using any of the following language character sets: Hellenic Alphabet, Cyrillic and Latin. The address should be provided in the national language of the respective Member State. Countries that use the Hellenic Alphabet or Cyrillic script should also provide a transcription into the Latin alphabet or a common English name. In countries where there is more than one official national language, the address should be provided in at least one official language of the jurisdiction. If the address is provided in more than one official national language, they should be separated by a '/' character.
4.1.	Country	Pre-defined text (options)	The Member States of the EU and the other EEA countries: Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Iceland, Ireland, Italy, Latvia, Liechtenstein, Lithuania, Luxembourg, Malta, Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, United Kingdom.
4.2.	City	Text (100 characters)	



4.3.	Address	Text (50 characters	
		per address line)	
4.4.	Postcode	Text (35 characters)	
5	National identification number of the account information service provider	Alphanumeric (50 characters)	The national identification number could be one of the following codes used by the home CA that provides information to the EBA: National identification number for natural and legal persons used in the respective Member State; Legal entity identifier — a code that allows legally distinct entities that engage in financial transactions to be uniquely identified; Registration number — a number or code used by the competent authority of a Member State in its national public register;
			Other equivalent means of identification – any means of identification of natural and legal persons used by the competent authority in its national public register.
6	The name of the competent authority responsible for the operation of the national public register	Text (100 characters)	The name of the competent authority which has provided the information about the account information service provider to the EBA and is accountable for this information. The name of the competent authority should be selected from a pre-defined list.
7	The payment services for which the account information service provider has been registered	Text (26 characters)	Pre-defined option – 'Account information services'
8	Current registration status of the account information service provider	Text (10 characters)	Current registration status of the account information service provider chosen from a pre-defined list: 1. Registered 2. Withdrawn
9	Date of registration	Numeric (8 characters)	The date of registration of the account information service provider. Depending on the practice of the competent authority, this date could be either the date when the account information service provider was registered with the competent authority or the date when it was included in the national public register.
10	Date of withdrawal (where applicable)	Numeric (8 characters)	The date of withdrawal of registration of the account information service provider. This is the date when the registration of the account information service provider was withdrawn.
11	Host Member States where the account information service provider provides or intends to provide account information services through the freedom to	Multiple pre- defined options (up to 31 options)	Host Member States where the account information service provides or intends to provide account information services through the freedom to provide services: Austria Belgium Bulgaria Croatia



	provide services		☐ Cyprus
			☐ Czech Republic
			□ Denmark
			□ Estonia
			☐ Finland
			France
			Germany
			Greece
			Hungary
			□Iceland
			☐Ireland
			□Italy
			□Latvia
			Liechtenstein
			□Lithuania
			Luxembourg
			□ Malta
			☐ Netherlands
			□ Norway
			Poland
			☐ Portugal
			Romania
			□ Slova kia
			□Slovenia
			☐ Spain
			Sweden
			☐ United Kingdom
12	Name of the branch of the	Text (up to 200	The official name of the branch used in the register should be either the name of the account information
	account information service	characters)	service provider, or the designated name of the respective branch. It should be entered in free text using
	provider established in a		any of the following language character sets: Hellenic Alphabet, Cyrillic and Latin. The name of the branch
	Member State other than		should be provided in the national language of the respective Member State. Countries that use the
	the home Member State of		Hellenic Alphabet or Cyrillic script should also provide either a transcription of the name or the trade
	the accountinformation		name of the branch into the Latin alphabet, or a translation or an alternative name of the branch in
	s er vice provider		another language based on the Latin alphabet.
			In countries where there is more than one official national language, all official names of the branch must



			be entered. The names must be separated by a '/' character.
13	The address of the principal branch of the account information service provider in the host Member State		The address of the principal branch of the account information service provider in the host Member State should be entered in free text using any of the following language character sets: Hellenic Alphabet, Cyrillic and Latin. Countries that use the Hellenic Alphabet or Cyrillic script should also provide a transcription into the Latin alphabet or a common English name. In countries where there is more than one official national language, the address should be provided in at least one official language of the jurisdiction. If the address is provided in more than one official national language, they should be separated by a '/' character.
13.1.	Country	Text (2 characters)	The Member States of the EU and the other EEA countries: Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Iceland, Ireland, Italy, Latvia, Liechtenstein, Lithuania, Luxembourg, Malta, Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, United Kingdom.
13.2.	City	Text (100 characters)	
13.3.	Address	Text (50 characters per address line)	
13.4.	Postcode	Text (35 characters)	
14	Host Member States where the account information service provider provides or intends to provide account information services through the freedom of establishment via a branch	Multiple pre- defined options (up to 31 options)	Host Member States where the account information service provider provides or intends to provide payment services through the freedom of establishment via a branch: Austria Belgium Bulgaria Croatia Cyprus Czech Republic Denmark Estonia Finland France Germany Greece Hungary Iceland Iteland Italy



	□Latvia
	Liechtenstein
	Lithuania
	Luxembourg
	Malta
	Netherlands
	□Norway
	Poland
	Portugal
	Romania
	Slovakia
	Slovenia
	☐ Spain
	Sweden
	United Kingdom



Table 4 – Format of the information on electronic money institutions

Row	Field	Maximum length	Format
		of the field	
1	Type of natural or legal person	Pre-defined text	Pre-defined option – 'Electronic money institution'.
2	Name of the electronic money institution	Text (250 characters)	The official name of the electronic money institution should be entered in free text using any of the following language character sets: Hellenic Alphabet, Cyrillic and Latin. The name of the institution should be provided in the national language of the respective Member State. Countries that use the Hellenic Alphabet or Cyrillic script should also provide either a transcription of the institution's name into the Latin alphabet, or a translation or an alternative name of the institution in another language based on the Latin alphabet. In countries where there is more than one official national language, all official names of the institution must be entered. The names must be separated by a '/' character.
3	Commercial name of the electronic money institution	Text (250 characters)	The commercial name of the electronic money institution should be entered in free text using any of the following language character sets: Hellenic Alphabet, Cyrillic and Latin. Countries that use the Hellenic Alphabet or Cyrillic script should also provide either a transcription of the institution's commercial name into the Latin alphabet, or a translation or an alternative commercial name of the institution in another language based on the Latin alphabet. If the electronic money institution uses more than one commercial name, all of the commercial names of the institution could be entered. These names must be separated by a '/' character. This field is optional for competent authorities to provide.
4	Address of the electronic money institution's head office		The address of the electronic money institution's head office should be entered in free text using any of the following language character sets: Hellenic Alphabet, Cyrillic and Latin. The address should be provided in the national language of the respective Member State. Countries that use the Hellenic Alphabet or Cyrillic script should also provide a transcription into the Latin alphabet or a common English name. In countries where there is more than one official national language, the address should be provided in at least one official language of the jurisdiction. If the address is provided in more than one official national language, they should be separated by a '/' character.
4.1.	Country	Pre-defined text (options)	The Member States of the EU and the other EEA countries: Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Iceland, Ireland, Italy, Latvia, Liechtenstein, Lithuania, Luxembourg, Malta, Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, United Kingdom.
4.2.	City	Text (100 characters)	
4.3.	Address	Text (50 characters per address line)	



4.4.	Postcode	Text (35 characters)	
5	National identification number of the electronic money institution	Alphanumeric (50 characters)	The national identification number could be one of the following codes used by the home CA that provides information to the EBA: National identification number for legal persons used in the respective Member State; Legal entity identifier – a code that allows legally distinct entities that engage in financial transactions to be uniquely identified; Authorisation number – a number or code appointed to an authorised electronic money institution by the competent authority of a Member State in the territory of which the entities have been established; Registration number – a number or code used by the competent authority of a Member State in its national public register; Other equivalent means of identification – any means of identification of legal persons used by the competent authority in its national public register.
6	The name of the competent authority responsible for the operation of the national public register	Text (100 characters)	The name of the competent authority which has provided the information about the electronic money institution to the EBA and is accountable for this information. The name of the competent authority should be selected from a pre-defined list.
7	The electronic money and payment services for which the electronic money institution has been authorised	Multiple pre-defined options (between 1 and 15 options)	The electronic money services from a pre-defined list: Issuing, distribution and redemption of electronic money The payment services from a pre-defined list: Services enabling cash to be placed on a payment account as well as all the operations required for operating a payment account Services enabling cash withdrawals from a payment account as well as all the operations required for operating a payment account Services enabling cash withdrawals from a payment account as well as all the operations required for operating a payment account Services enabling cash withdrawals from a payment account as well as all the operations required for operating a payment transactions, including transfers of funds on a payment account with the user's payment provider or with another payment service provider: a)



			acquiring of payment transactions
			6. Money remittance
			7. Payment initiation services
			8. Account information services
8	Current authorisation	Text (10 characters)	Current authorisation status of the electronic money institution chosen from a pre-defined list:
Ü	status of the electronic	Text (10 characters)	1. Authorised
	money institution		2. Withdrawn
9	Date of authorisation	Numeric (8	The date of authorisation of the electronic money institution. Depending on the practice of the competent
_		characters)	authority, this date could be either the date when the electronic money institution was authorised by the
		characters	competent authority or the date when it was included in its national public register.
10	Date of withdrawal (where	Numeric (8	The date of withdrawal of authorisation of the electronic money institution. This is the date when the
10	applicable)	characters)	authorisation of the electronic money institution was withdrawn.
11	Host Member States	Multiple pre-defined	Host Member States where the electronic money institution provides or intends to provide services
	where the electronic	options (up to 31	through the freedom to provide services and the respective services that were notified to the host
	money institution provides	options, which have	competent authority:
	or intends to provide	up to 14 pre-defined	□ Austria:
	services through the	sub-options)	The electronic money services from a pre-defined list:
	freedom to provide		☐ Issuing, distribution and redemption of electronic money
	services and the		The payment services from a pre-defined list:
	respective services that		1. Services enabling cash to be placed on a payment account as well as all the operations required
	were notified to the host		for operating a payment account
	competent authority		2. Services enabling cash withdrawals from a payment account as well as all the operations
	,		required for operating a payment account
			3. Execution of payment transactions, including transfers of funds on a payment account with the
			user's payment provider or with another payment service provider:
			a) a execution of direct debits, including one-off direct debits
			b) are execution of payment transactions through a payment card or a similar device
			c) cexecution of credit transfers, including standing orders
			4. Execution of payment transactions where the funds are covered by a credit line for a payment
			service user:
			a) a execution of direct debits, including one-off direct debits
			b) \square execution of payment transactions through a payment card or a similar device
			c) cexecution of credit transfers, including standing orders
			5. Issuing of payment instruments
			acquiring of payment transactions



	6. Money remittance
	7. Payment initiation services
	8. Account information services
	☐ Belgium:
	The electronic money services from a pre-defined list:
	☐ Issuing, distribution and redemption of electronic money
	The payment services from a pre-defined list:
	1. Services enabling cash to be placed on a payment account as well as all the operations required
	for operating a payment account
	2. Services enabling cash withdrawals from a payment account as well as all the operations
	required for operating a payment account
	3. Execution of payment transactions, including transfers of funds on a payment account with the
	user's payment provider or with another payment service provider:
	a) a execution of direct debits, including one-off direct debits
	b) \square execution of payment transactions through a payment card or a similar device
	c) cexecution of credit transfers, including standing orders
	4. Execution of payment transactions where the funds are covered by a credit line for a payment
	service user:
	a) aexecution of direct debits, including one-off direct debits
	b) \square execution of payment transactions through a payment card or a similar device
	c) are execution of credit transfers, including standing orders
	5. Issuing of payment instruments
	acquiring of payment transactions
	6. Money remittance
	7. Payment initiation services
	8. Account information services
	☐ Bulgaria:
	The electronic money services from a pre-defined list:
	☐ Issuing, distribution and redemption of electronic money
	The payment services from a pre-defined list:
	1. Services enabling cash to be placed on a payment account as well as all the operations required
	for operating a payment account
	2. Services enabling cash withdrawals from a payment account as well as all the operations



	required for operating a payment account
	3. Execution of payment transactions, including transfers of funds on a payment account with the
	use <u>r's</u> payment provider or with another payment service provider:
	a) a execution of direct debits, including one-off direct debits
	b) \square execution of payment transactions through a payment card or a similar device
	c) cexecution of credit transfers, including standing orders
	4. Execution of payment transactions where the funds are covered by a credit line for a payment
	service user:
	a) 🔲 execution of direct debits, including one-off direct debits
	b) \square execution of payment transactions through a payment card or a similar device
	c) cexecution of credit transfers, including standing orders
	5. Issuing of payment instruments
	acquiring of payment transactions
	6. Money remittance
	7. Payment initiation services
	8. Account information services
	☐ Croatia:
	The electronic money services from a pre-defined list:
	☐ Issuing, distribution and redemption of electronic money
	The payment services from a pre-defined list:
	1. L Services enabling cash to be placed on a payment account as well as all the operations required
	for <u>op</u> erating a payment account
	2. Services enabling cash withdrawals from a payment account as well as all the operations
	required for operating a payment account
	3. Execution of payment transactions, including transfers of funds on a payment account with the
	user's payment provider or with another payment service provider:
	a) a execution of direct debits, including one-off direct debits
	b) \square execution of payment transactions through a payment card or a similar device
	c) cexecution of credit transfers, including standing orders
	4. Execution of payment transactions where the funds are covered by a credit line for a payment
	service user:
	a) a execution of direct debits, including one-off direct debits
	b) \square execution of payment transactions through a payment card or a similar device
	c) cexecution of credit transfers, including standing orders



	5. Issuing of payment instruments
	acquiring of payment transactions
	6. Money remittance
	7. Payment initiation services
	8. Account information services
	□Cyprus:
	The electronic money services from a pre-defined list:
	☐ Issuing, distribution and redemption of electronic money
	The payment services from a pre-defined list:
	1. Services enabling cash to be placed on a payment account as well as all the operations required
	for operating a payment account
	2. Services enabling cash withdrawals from a payment account as well as all the operations
	required for operating a payment account
	3. Execution of payment transactions, including transfers of funds on a payment account with the
	user's payment provider or with another payment service provider:
	a) a execution of direct debits, including one-off direct debits
	b) are execution of payment transactions through a payment card or a similar device
	c) are execution of credit transfers, including standing orders
	4. Execution of payment transactions where the funds are covered by a credit line for a payment
	service user:
	a) a execution of direct debits, including one-off direct debits
	b) are execution of payment transactions through a payment card or a similar device
	c) are execution of credit transfers, including standing orders
	5. Issuing of payment instruments
	acquiring of payment transactions
	6. Money remittance
	7. Payment initiation services
	8. Account information services
	Czech Republic:
	The electronic money services from a pre-defined list:
	☐ Issuing, distribution and redemption of electronic money
	The payment services from a pre-defined list:
	1. Services enabling cash to be placed on a payment account as well as all the operations required



	for operating a payment account
	2. Last Services enabling cash withdrawals from a payment account as well as all the operations
	required for operating a payment account
	3. Execution of payment transactions, including transfers of funds on a payment account with the
	use <u>r's</u> payment provider or with another payment service provider:
	a) 🔲 execution of direct debits, including one-off direct debits
	b) uexecution of payment transactions through a payment card or a similar device
	c) Lexecution of credit transfers, including standing orders
	4. Execution of payment transactions where the funds are covered by a credit line for a payment
	service user:
	a) a execution of direct debits, including one-off direct debits
	b) \square execution of payment transactions through a payment card or a similar device
	c) cexecution of credit transfers, including standing orders
	5. Issuing of payment instruments
	acquiring of payment transactions
	6. Money remittance
	7. Payment initiation services
	8. Account information services
	Denmark:
	The electronic money services from a pre-defined list:
	☐ Issuing, distribution and redemption of electronic money
	The payment services from a pre-defined list:
	1. Services enabling cash to be placed on a payment account as well as all the operations required
	for operating a payment account
	2. Services enabling cash withdrawals from a payment account as well as all the operations
	required for operating a payment account
	3. Execution of payment transactions, including transfers of funds on a payment account with the
	user's payment provider or with another payment service provider:
	a) execution of direct debits, including one-off direct debits
	b) Lexecution of payment transactions through a payment card or a similar device
	c) Lexecution of credit transfers, including standing orders
	4. Execution of payment transactions where the funds are covered by a credit line for a payment
	service user:
	a) Lexecution of direct debits, including one-off direct debits



	b) 🔲 execution of payment transactions through a payment card or a similar device
	c) uexecution of credit transfers, including standing orders
	5. Issuing of payment instruments
	acquiring of payment transactions
	6. Money remittance
	7. Payment initiation services
	8. Account information services
	☐ Estonia:
	The electronic money services from a pre-defined list:
	☐ Issuing, distribution and redemption of electronic money
	The payment services from a pre-defined list:
	1. Services enabling cash to be placed on a payment account as well as all the operations required
	for operating a payment account
	2. Services enabling cash withdrawals from a payment account as well as all the operations
	required for operating a payment account
	3. Execution of payment transactions, including transfers of funds on a payment account with the
	use <u>r's</u> payment provider or with another payment service provider:
	a) a execution of direct debits, including one-off direct debits
	b) are execution of payment transactions through a payment card or a similar device
	c) cexecution of credit transfers, including standing orders
	4. Execution of payment transactions where the funds are covered by a credit line for a payment
	service user:
	a) a execution of direct debits, including one-off direct debits
	b) \square execution of payment transactions through a payment card or a similar device
	c) cexecution of credit transfers, including standing orders
	5. Issuing of payment instruments
	acquiring of payment transactions
	6. Money remittance
	7. Payment initiation services
	8. Account information services
	Finland:
	The electronic money services from a pre-defined list:
	☐ Issuing, distribution and redemption of electronic money



	The payment services from a pre-defined list:
	1. Services enabling cash to be placed on a payment account as well as all the operations required
	for operating a payment account
	2. \square Services enabling cash withdrawals from a payment account as well as all the operations
	required for operating a payment account
	3. Execution of payment transactions, including transfers of funds on a payment account with the
	user's payment provider or with another payment service provider:
	a) a execution of direct debits, including one-off direct debits
	b) \square execution of payment transactions through a payment card or a similar device
	c) are execution of credit transfers, including standing orders
	4. Execution of payment transactions where the funds are covered by a credit line for a payment
	service user:
	a) a execution of direct debits, including one-off direct debits
	b) are execution of payment transactions through a payment card or a similar device
	c) are execution of credit transfers, including standing orders
	5. Issuing of payment instruments
	acquiring of payment transactions
	6. Money remittance
	7. Payment initiation services
	8. Account information services
	☐ France:
	The electronic money services from a pre-defined list:
	☐ Issuing, distribution and redemption of electronic money
	The payment services from a pre-defined list:
	1. Services enabling cash to be placed on a payment account as well as all the operations required
	for operating a payment account
	2. \square Services enabling cash withdrawals from a payment account as well as all the operations
	required for operating a payment account
	3. Execution of payment transactions, including transfers of funds on a payment account with the
	user's payment provider or with another payment service provider:
	a) a execution of direct debits, including one-off direct debits
	b) \square execution of payment transactions through a payment card or a similar device
	c) are execution of credit transfers, including standing orders
	4. Execution of payment transactions where the funds are covered by a credit line for a payment



	service user: a)
	Germany:
	□ Gleece.



	The electronic money services from a pre-defined list:
	☐ Issuing, distribution and redemption of electronic money
	The payment services from a pre-defined list:
	1. Services enabling cash to be placed on a payment account as well as all the operations required
	for operating a payment account
	2. Services enabling cash withdrawals from a payment account as well as all the operations
	required for operating a payment account
	3. Execution of payment transactions, including transfers of funds on a payment account with the
	user's payment provider or with another payment service provider:
	a) 🔲 execution of direct debits, including one-off direct debits
	b) 🔲 execution of payment transactions through a payment card or a similar device
	c) Lexecution of credit transfers, including standing orders
	4. Execution of payment transactions where the funds are covered by a credit line for a payment
	service user:
	a) a execution of direct debits, including one-off direct debits
	b) are execution of payment transactions through a payment card or a similar device
	c) cexecution of credit transfers, including standing orders
	5. Issuing of payment instruments
	acquiring of payment transactions
	6. Money remittance
	7. Payment initiation services
	8. Account information services
	☐ Hungary:
	The electronic money services from a pre-defined list:
	☐ Issuing, distribution and redemption of electronic money
	The payment services from a pre-defined list:
	1. Services enabling cash to be placed on a payment account as well as all the operations required
	for operating a payment account
	2. Services enabling cash withdrawals from a payment account as well as all the operations
	required for operating a payment account
	3. Execution of payment transactions, including transfers of funds on a payment account with the
	user's payment provider or with another payment service provider:
	a) execution of direct debits, including one-off direct debits
	b) Lexecution of payment transactions through a payment card or a similar device



	c) cexecution of credit transfers, including standing orders
	4. Execution of payment transactions where the funds are covered by a credit line for a payment
	service user:
	a) a execution of direct debits, including one-off direct debits
	b) are execution of payment transactions through a payment card or a similar device
	c) are execution of credit transfers, including standing orders
	5. Issuing of payment instruments
	acquiring of payment transactions
	6. Money remittance
	7. Payment initiation services
	8. Account information services
	□ Iceland:
	The electronic money services from a pre-defined list:
	☐ Issuing, distribution and redemption of electronic money
	The payment services from a pre-defined list:
	1. Services enabling cash to be placed on a payment account as well as all the operations required
	for operating a payment account
	2. Services enabling cash withdrawals from a payment account as well as all the operations
	required for operating a payment account
	3. Execution of payment transactions, including transfers of funds on a payment account with the
	user's payment provider or with another payment service provider:
	a) a execution of direct debits, including one-off direct debits
	b) are execution of payment transactions through a payment card or a similar device
	c) are execution of credit transfers, including standing orders
	4. Execution of payment transactions where the funds are covered by a credit line for a payment
	service user:
	a) a execution of direct debits, including one-off direct debits
	b) a execution of payment transactions through a payment card or a similar device
	c) a execution of credit transfers, including standing orders
	5. Issuing of payment instruments
	acquiring of payment transactions
	6. Money remittance
	7. Payment initiation services
	8. Account information services





	a) a execution of direct debits, including one-off direct debits
	b) \bigsqcup execution of payment transactions through a payment card or a similar device
	c) cexecution of credit transfers, including standing orders
	4. Execution of payment transactions where the funds are covered by a credit line for a payment
	service user:
	a) a execution of direct debits, including one-off direct debits
	b) \square execution of payment transactions through a payment card or a similar device
	c) are execution of credit transfers, including standing orders
	5. Issuing of payment instruments
	☐ acquiring of payment transactions
	6. Money remittance
	7. Payment initiation services
	8. Account information services
	□ Latvia:
	The electronic money services from a pre-defined list:
	☐ Issuing, distribution and redemption of electronic money
	The payment services from a pre-defined list:
	1. Services enabling cash to be placed on a payment account as well as all the operations required
	for operating a payment account
	2. \square Services enabling cash withdrawals from a payment account as well as all the operations
	required for operating a payment account
	3. Execution of payment transactions, including transfers of funds on a payment account with the
	user's payment provider or with another payment service provider:
	a) a execution of direct debits, including one-off direct debits
	b) are execution of payment transactions through a payment card or a similar device
	c) are execution of credit transfers, including standing orders
	4. Execution of payment transactions where the funds are covered by a credit line for a payment
	service user:
	a) a execution of direct debits, including one-off direct debits
	b) are execution of payment transactions through a payment card or a similar device
	c) \square execution of credit transfers, including standing orders
	5. Issuing of payment instruments
	acquiring of payment transactions
	6. Money remittance



	7. Payment initiation services
	8. Account information services
	☐ Liechtenstein:
	The electronic money services from a pre-defined list:
	☐ Issuing, distribution and redemption of electronic money
	The payment services from a pre-defined list:
	1. Services enabling cash to be placed on a payment account as well as all the operations required
	for operating a payment account
	2. Services enabling cash withdrawals from a payment account as well as all the operations required for operating a payment account
	3. Execution of payment transactions, including transfers of funds on a payment account with the
	user's payment provider or with another payment service provider:
	a) execution of direct debits, including one-off direct debits
	b) execution of payment transactions through a payment card or a similar device
	c) Lexecution of credit transfers, including standing orders 4. Execution of payment transactions where the funds are covered by a credit line for a payment
	service user:
	a) execution of direct debits, including one-off direct debits
	b) execution of payment transactions through a payment card or a similar device
	c) execution of payment transactions through a payment card of a similar device
	5. Issuing of payment instruments
	acquiring of payment transactions
	6. Money remittance
	7. Payment initiation services
	8. Account information services
	or Environmental vices
	□ Lithuania:
	The electronic money services from a pre-defined list:
	☐ Issuing, distribution and redemption of electronic money
	The payment services from a pre-defined list:
	1. Services enabling cash to be placed on a payment account as well as all the operations required
	for operating a payment account
	2. Services enabling cash withdrawals from a payment account as well as all the operations
	required for operating a payment account



	3. Execution of payment transactions, including transfers of funds on a payment account with the
	user's payment provider or with another payment service provider:
	a) a execution of direct debits, including one-off direct debits
	b) \square execution of payment transactions through a payment card or a similar device
	c) are execution of credit transfers, including standing orders
	4. Execution of payment transactions where the funds are covered by a credit line for a payment
	service user:
	a) a execution of direct debits, including one-off direct debits
	b) are execution of payment transactions through a payment card or a similar device
	c) cexecution of credit transfers, including standing orders
	5. Issuing of payment instruments
	☐ acquiring of payment transactions
	6. Money remittance
	7. Payment initiation services
	8. Account information services
	Luxembourg:
	The electronic money services from a pre-defined list:
	☐ Issuing, distribution and redemption of electronic money
	The payment services from a pre-defined list:
	1. Services enabling cash to be placed on a payment account as well as all the operations required
	for <u>op</u> erating a payment account
	2. Laservices enabling cash withdrawals from a payment account as well as all the operations
	required for operating a payment account
	3. Execution of payment transactions, including transfers of funds on a payment account with the
	use <u>r's</u> payment provider or with another payment service provider:
	a) \bigsqcup execution of direct debits, including one-off direct debits
	b) \bigsqcup execution of payment transactions through a payment card or a similar device
	c) Lexecution of credit transfers, including standing orders
	4. Execution of payment transactions where the funds are covered by a credit line for a payment
	service user:
	a) \sqsubseteq execution of direct debits, including one-off direct debits
	b) \bigsqcup execution of payment transactions through a payment card or a similar device
	c) execution of credit transfers, including standing orders
	5. LIssuing of payment instruments



	acquiring of payment transactions
	6. Money remittance
	7. Payment initiation services
	8. Account information services
	o. In Account Monda don services
	☐ Malta:
	The electronic money services from a pre-defined list:
	☐ Issuing, distribution and redemption of electronic money
	The payment services from a pre-defined list:
	1. Services enabling cash to be placed on a payment account as well as all the operations required
	for operating a payment account
	2. Services enabling cash withdrawals from a payment account as well as all the operations
	required for operating a payment account
	3. Execution of payment transactions, including transfers of funds on a payment account with the
	user's payment provider or with another payment service provider:
	a) a execution of direct debits, including one-off direct debits
	b) are execution of payment transactions through a payment card or a similar device
	c) \square execution of credit transfers, including standing orders
	4. Execution of payment transactions where the funds are covered by a credit line for a payment
	service user:
	a) a execution of direct debits, including one-off direct debits
	b) \square execution of payment transactions through a payment card or a similar device
	c) are execution of credit transfers, including standing orders
	5. Issuing of payment instruments
	☐ acquiring of payment transactions
	6. Money remittance
	7. Payment initiation services
	8. Account information services
	□ Netherlands:
	The electronic money services from a pre-defined list:
	☐ Issuing, distribution and redemption of electronic money
	The payment services from a pre-defined list:
	1. Services enabling cash to be placed on a payment account as well as all the operations required
	for operating a payment account



	2. Services enabling cash withdrawals from a payment account as well as all the operations
	required for operating a payment account
	3. Execution of payment transactions, including transfers of funds on a payment account with the
	use <u>r's</u> payment provider or with another payment service provider:
	a) Legion and a execution of direct debits, including one-off direct debits
	b) \square execution of payment transactions through a payment card or a similar device
	c) cexecution of credit transfers, including standing orders
	4. Execution of payment transactions where the funds are covered by a credit line for a payment
	service user:
	a) a execution of direct debits, including one-off direct debits
	b) are execution of payment transactions through a payment card or a similar device
	c) cexecution of credit transfers, including standing orders
	5. Issuing of payment instruments
	acquiring of payment transactions
	6. Money remittance
	7. Payment initiation services
	8. Account information services
	□ Norway:
	The electronic money services from a pre-defined list:
	☐ Issuing, distribution and redemption of electronic money
	The payment services from a pre-defined list:
	1. Services enabling cash to be placed on a payment account as well as all the operations required
	for operating a payment account
	2. Services enabling cash withdrawals from a payment account as well as all the operations
	required for operating a payment account
	3. Execution of payment transactions, including transfers of funds on a payment account with the
	user's payment provider or with another payment service provider:
	a) a execution of direct debits, including one-off direct debits
	b) are execution of payment transactions through a payment card or a similar device
	c) are execution of credit transfers, including standing orders
	4. Execution of payment transactions where the funds are covered by a credit line for a payment
	service user:
	a) a execution of direct debits, including one-off direct debits
	b) are execution of payment transactions through a payment card or a similar device



	c) execution of credit transfers, including standing orders
	5. Lasuing of payment instruments
	acquiring of payment transactions
	6. U Money remittance
	7. Payment initiation services
	8. Account information services
	Poland:
	The electronic money services from a pre-defined list:
	☐ Issuing, distribution and redemption of electronic money
	The payment services from a pre-defined list:
	1. L Services enabling cash to be placed on a payment account as well as all the operations required
	for operating a payment account
	2. \square Services enabling cash withdrawals from a payment account as well as all the operations
	required for operating a payment account
	3. Execution of payment transactions, including transfers of funds on a payment account with the
	use <u>r's</u> payment provider or with another payment service provider:
	a) a execution of direct debits, including one-off direct debits
	b) \bigsqcup execution of payment transactions through a payment card or a similar device
	c) Lexecution of credit transfers, including standing orders
	4. Execution of payment transactions where the funds are covered by a credit line for a payment
	service user:
	a) \bigsqcup execution of direct debits, including one-off direct debits
	b) \bigsqcup execution of payment transactions through a payment card or a similar device
	c) \bigsqcup execution of credit transfers, including standing orders
	5. La Issuing of payment instruments
	acquiring of payment transactions
	6. U Money remittance
	7. L Payment initiation services
	8. Account information services
	☐ Portugal:
	The electronic money services from a pre-defined list:
	☐ Issuing, distribution and redemption of electronic money
	The payment services from a pre-defined list:



	1. Services enabling cash to be placed on a payment account as well as all the operations required
	for operating a payment account
	2. Laservices enabling cash withdrawals from a payment account as well as all the operations
	required for operating a payment account
	3. Execution of payment transactions, including transfers of funds on a payment account with the
	user's payment provider or with another payment service provider:
	a) a execution of direct debits, including one-off direct debits
	b) uexecution of payment transactions through a payment card or a similar device
	c) cexecution of credit transfers, including standing orders
	4. Execution of payment transactions where the funds are covered by a credit line for a payment
	service user:
	a) execution of direct debits, including one-off direct debits
	b) 🔲 execution of payment transactions through a payment card or a similar device
	c) cexecution of credit transfers, including standing orders
	5. Issuing of payment instruments
	acquiring of payment transactions
	6. Money remittance
	7. Payment initiation services
	8. Account information services
	Romania:
	The electronic money services from a pre-defined list:
	☐ Issuing, distribution and redemption of electronic money
	The payment services from a pre-defined list:
	1. Services enabling cash to be placed on a payment account as well as all the operations required
	for <u>op</u> erating a payment account
	2. Laservices enabling cash withdrawals from a payment account as well as all the operations
	required for operating a payment account
	3. Execution of payment transactions, including transfers of funds on a payment account with the
	user's payment provider or with another payment service provider:
	a) \bigsqcup execution of direct debits, including one-off direct debits
	b) \bigsqcup execution of payment transactions through a payment card or a similar device
	c) Lexecution of credit transfers, including standing orders
	4. Execution of payment transactions where the funds are covered by a credit line for a payment
	service user:



		a) \square execution of direct debits, including one-off direct debits
		b) \square execution of payment transactions through a payment card or a similar device
		c) are execution of credit transfers, including standing orders
		5. Issuing of payment instruments
		acquiring of payment transactions
		6. Money remittance
		7. Payment initiation services
		8. Account information services
		Slovakia:
		The electronic money services from a pre-defined list:
		Issuing, distribution and redemption of electronic money
		The payment services from a pre-defined list:
		1. Services enabling cash to be placed on a payment account as well as all the operations required
		for operating a payment account
		2. Services enabling cash withdrawals from a payment account as well as all the operations
		required for operating a payment account
		3. Execution of payment transactions, including transfers of funds on a payment account with the
		user's payment provider or with another payment service provider:
		a) a execution of direct debits, including one-off direct debits
		b) a execution of payment transactions through a payment card or a similar device
		c) execution of credit transfers, including standing orders
		4. Execution of payment transactions where the funds are covered by a credit line for a payment
		service user:
		a) a execution of direct debits, including one-off direct debits
		b) acceptation of payment transactions through a payment card or a similar device
		c) execution of credit transfers, including standing orders
		5. Issuing of payment instruments
		acquiring of payment transactions
		6. Money remittance
		7. Payment initiation services
		8. Account information services
		□Slovenia:
	-	The electronic money services from a pre-defined list:



	☐ Issuing, distribution and redemption of electronic money
	The payment services from a pre-defined list:
	1. Services enabling cash to be placed on a payment account as well as all the operations required
	for operating a payment account
	2. \square Services enabling cash withdrawals from a payment account as well as all the operations
	required for operating a payment account
	3. Execution of payment transactions, including transfers of funds on a payment account with the
	user's payment provider or with another payment service provider:
	a) a execution of direct debits, including one-off direct debits
	b) \square execution of payment transactions through a payment card or a similar device
	c) cexecution of credit transfers, including standing orders
	4. Execution of payment transactions where the funds are covered by a credit line for a payment
	service user:
	a) a execution of direct debits, including one-off direct debits
	b) \square execution of payment transactions through a payment card or a similar device
	c) cexecution of credit transfers, including standing orders
	5. Issuing of payment instruments
	acquiring of payment transactions
	6. Money remittance
	7. Payment initiation services
	8. Account information services
	\square Spain:
	The electronic money services from a pre-defined list:
	☐ Issuing, distribution and redemption of electronic money
	The payment services from a pre-defined list:
	1. L Services enabling cash to be placed on a payment account as well as all the operations required
	for <u>op</u> erating a payment account
	2. \square Services enabling cash withdrawals from a payment account as well as all the operations
	required for operating a payment account
	3. Execution of payment transactions, including transfers of funds on a payment account with the
	use <u>r's</u> payment provider or with another payment service provider:
	a) a execution of direct debits, including one-off direct debits
	b) 🔲 execution of payment transactions through a payment card or a similar device
	c) cexecution of credit transfers, including standing orders



		4. Execution of payment transactions where the funds are covered by a credit line for a payment service user:
		a) execution of direct debits, including one-off direct debits
		b) 🔲 execution of payment transactions through a payment card or a similar device
		c) Legion of credit transfers, including standing orders
		5. Issuing of payment instruments
		acquiring of payment transactions
		6. Money remittance
		7. Payment initiation services
		8. Account information services
		Sweden:
		The electronic money services from a pre-defined list:
		☐ Issuing, distribution and redemption of electronic money
		The payment services from a pre-defined list:
		1. Services enabling cash to be placed on a payment account as well as all the operations required
		for <u>op</u> erating a payment account
		2. \square Services enabling cash withdrawals from a payment account as well as all the operations
		required for operating a payment account
		3. Execution of payment transactions, including transfers of funds on a payment account with the
		user's payment provider or with another payment service provider:
		a) a execution of direct debits, including one-off direct debits
		b) are execution of payment transactions through a payment card or a similar device
		c) \square execution of credit transfers, including standing orders
		4. Execution of payment transactions where the funds are covered by a credit line for a payment
		service user:
		a) a execution of direct debits, including one-off direct debits
		b) are execution of payment transactions through a payment card or a similar device
		c) cexecution of credit transfers, including standing orders
		5. Issuing of payment instruments
		acquiring of payment transactions
		6. Money remittance
		7. Payment initiation services
		8. Account information services
		o
l .	l .	



			United Kingdom:
			The electronic money services from a pre-defined list:
			☐ Issuing, distribution and redemption of electronic money
			The payment services from a pre-defined list:
			1. Services enabling cash to be placed on a payment account as well as all the operations required
			for operating a payment account
			2. Services enabling cash withdrawals from a payment account as well as all the operations
			required for operating a payment account
			3. Execution of payment transactions, including transfers of funds on a payment account with the
			user's payment provider or with another payment service provider:
			a) a execution of direct debits, including one-off direct debits
			b) axecution of payment transactions through a payment card or a similar device
			c) execution of payment transactions through a payment card of a similar device
			4. Execution of payment transactions where the funds are covered by a credit line for a payment
			service user:
			a) a execution of direct debits, including one-off direct debits
			b) axecution of payment transactions through a payment card or a similar device
			c) = execution of credit transfers, including standing orders
			5. Issuing of payment instruments
			acquiring of payment transactions
			6. Money remittance
			7. Payment initiation services
			8. Account information services
12	Name of the branch of the	Text (up to 200	The official name of the branch entered in the register should be either the name of the electronic money
	electronic money	characters)	institution, or the designated name of the respective branch. It should be entered in free text using any of
	institution established in a		the following language character sets: Hellenic Alphabet, Cyrillic and Latin. The name of the branch should
	Member State other than		be provided in the national language of the respective Member State. Countries that use the Hellenic
	the home Member State		Alphabet or Cyrillic script should also provide either a transcription of the name or the trade name of the
	of the electronic money		branch into the Latin alphabet, or a translation or an alternative name of the branch in another language
	institution		based on the Latin alphabet.
			In countries where there is more than one official national language, all official names of the branch must
			be entered. The names must be separated by a '/' character.
13	The address of the		The address of the principal branch of the electronic money institution in the host Member State should be
	principal branch of the		entered in free text using any of the following language character sets: Hellenic Alphabet, Cyrillic and Latin.
	electronic money		Countries that use the Hellenic Alphabet or Cyrillic script should also provide a transcription into the Latin



	institution in the host Member State		alphabet or a common English name. In countries where there is more than one official national language, the address should be provided in at least one official language of the jurisdiction. If the address is provided in more than one official national language, they should be separated by a '/' character.
13.1.	Country	Pre-defined text (options)	The Member States of the EU and the other EEA countries: Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Iceland, Ireland, Italy, Latvia, Liechtenstein, Lithuania, Luxembourg, Malta, Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, United Kingdom.
13.2.	City	Text (100 characters)	
13.3.	Address	Text (50 characters per address line)	
13.4.	Postcode	Text (35 characters)	
14	Host Member States where the electronic money institution provides or intends to provide	Multiple pre-defined options (up to 31 options, which that have up to 14 pre-	Host Member States where the electronic money institution provides or intends to provide services through the freedom of establishment via a branch and the respective services that were notified to the host competent authority:
	services through the freedom of establishment via a branch and the respective services that were notified to the host competent authority	defined sub-options)	Same options as row 11 from this table.



Table 5 – Format of the information on legal persons benefiting from an exemption pursuant to Article 9 of Directive 2009/110/EC

Row	Field	Maximum length	Format
		of the field	
1	Type of natural or legal person	Pre-defined text	Pre-defined option — 'Exempted electronic money institution'.
2	Name of the exempted electronic money institution	Text (250 characters)	The official name of the exempted electronic money institution should be entered in free text using any of the following language character sets: Hellenic Alphabet, Cyrillic and Latin. The name of the institution should be provided in the national language of the respective Member State. Countries that use the Hellenic Alphabet or Cyrillic script should also provide either a transcription of the institution's name into the Latin alphabet, or a translation or an alternative name of the institution in another language based on the Latin alphabet. In countries where there is more than one official national language, all official names of the institution must be entered. The names must be separated by a '/' character.
3	Commercial name of the exempted electronic money institution	Text (250 characters)	The commercial name of the exempted electronic money institution should be entered in free text using any of the following language character sets: Hellenic Alphabet, Cyrillic and Latin. Countries that use the Hellenic Alphabet or Cyrillic script should also provide either a transcription of the institution's commercial name into the Latin alphabet, or a translation or an alternative commercial name of the institution in another language based on the Latin alphabet. If the exempted electronic money institution uses more than one commercial name, all of the commercial names of the institution could be entered. These names must be separated by a '/' character. This field is optional for competent authorities to provide.
4	Address of the exempted electronic money institution's head office		The address of the exempted electronic money institution's head office should be entered in free text using any of the following language character sets: Hellenic Alphabet, Cyrillic and Latin. The address should be provided in the national language of the respective Member State. Countries that use the Hellenic Alphabet or Cyrillic script should also provide a transcription into the Latin alphabet or a common English name. In countries where there is more than one official national language, the address should be provided in at least one official language of the jurisdiction. If the address is provided in more than one official national language, they should be separated by a '/' character.
4.1.	Country	Pre-defined text (options)	The Member States of the EU and the other EEA countries: Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Iceland, Ireland, Italy, Latvia, Liechtenstein, Lithuania, Luxembourg, Malta, Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, United Kingdom.
4.2.	City	Text (100 characters)	<u> </u>
4.3.	Address	Text (50 characters	



		per address line)	
4.4.	Postcode	Text (35 characters)	
5	National identification number of the exempted electronic money institution	Alphanumeric (50 characters)	The national identification number could be one of the following codes used by the home CA that provides information to the EBA: National identification number for legal persons used in the respective Member State; Legal entity identifier – a code that allows legally distinct entities that engage in financial transactions to be uniquely identified; Registration number – a number or code used by the competent authority of a Member State in its national public register; Other equivalent means of identification – any means of identification of legal persons used by the competent authority in its national public register.
6	The name of the competent authority responsible for the operation of the national public register	Text (100 characters)	The name of the competent authority which has provided the information about the exempted electronic money institution to the EBA and is accountable for this information. The name of the competent authority should be selected from a pre-defined list.
7	The electronic money and payment services for which the exempted electronic money institution has been registered	Multiple pre-defined options (between 1 and 15 options)	The electronic money services from a pre-defined list: Issuing, distribution and redemption of electronic money The payment services from a pre-defined list: Services enabling cash to be placed on a payment account as well as all the operations required for operating a payment account Services enabling cash withdrawals from a payment account as well as all the operations required for operating a payment account Execution of payment transactions, including transfers of funds on a payment account with the user's payment provider or with another payment service provider: a) execution of direct debits, including one-off direct debits b) execution of payment transactions through a payment card or a similar device c) execution of credit transfers, including standing orders Execution of payment transactions where the funds are covered by a credit line for a payment service user: a) execution of direct debits, including one-off direct debits b) execution of payment transactions through a payment card or a similar device c) execution of credit transfers, including standing orders Secution of credit transfers, including standing orders Issuing of payment instruments acquiring of payment transactions



			6. Money remittance
8	Current registration status of the exempted electronic money institution	Text (10 characters)	Current registration status of the exempted electronic money institution status chosen from a pre-defined list: 1. Registered 2. Withdrawn
9	Date of registration	Numeric (8 characters)	The date of registration of the exempted electronic money institution. Depending on the practice of the competent authority, this date could be either the date when the exempted electronic money institution was registered with the competent authority or the date when it was included in its national public register.
10	Date of withdrawal (where applicable)	Numeric (8 characters)	The date of withdrawal of registration of the exempted electronic money institution. This is the date when the registration of the exempted electronic money institution was withdrawn.



Table 6 – Format of the information on agents

Row	Field	Maximum length of the field	Format
1	Type of natural or legal person	Pre-defined text	Pre-defined option – 'Agent'.
2	Name of the agent	Text (250 characters)	The official name of the agent should be entered in free text using any of the following language character sets: Hellenic Alphabet, Cyrillic and Latin. The name of the agent should be provided in the national language of the respective Member State. Countries that use the Hellenic Alphabet or Cyrillic script should also provide either a transcription of the agent's name into the Latin alphabet, or a translation or an alternative name of the agent in another language based on the Latin alphabet. In countries where there is more than one official national language, all official names of the agent must be entered. The names must be separated by a '/' character.
3	Address of the agent		The address of the agent's head office should be entered in free text using any of the following language character sets: Hellenic Alphabet, Cyrillic and Latin. The address should be provided in the national language of the respective Member State. Countries that use the Hellenic Alphabet or Cyrillic script should also provide a transcription into the Latin alphabet or a common English name. In countries where there is more than one official national language, the address should be provided in at least one official language of the jurisdiction. If the address is provided in more than one official national language, they should be separated by a '/' character.
3.1.	Country	Pre-defined text (options)	The Member States of the EU and the other EEA countries: Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Iceland, Ireland, Italy, Latvia, Liechtenstein, Lithuania, Luxembourg, Malta, Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, United Kingdom.
3.2.	City	Text (100 characters)	,, , , , , , , , , , , , , , , , , , , ,
3.3.	Address	Text (50 characters per address line)	
3.4.	Postcode	Text (35 characters)	
4	National identification number of the agent	Alphanumeric (50 characters)	The national identification number could be one of the following codes used by the home CA that provides information to the EBA: National identification number for natural and legal persons used in the respective Member State; Legal entity identifier — a code that allows legally distinct entities that engage in financial transactions to be uniquely identified; Registration number — a number or code used by the competent authority of a Member State in its national public register; Other equivalent means of identification — any means of identification of natural and legal persons used by



			the control of the state of the
			the competent authority in its national public register.
5	The name of the competent authority responsible for the operation of the national public register	Text (100 characters)	The name of the competent authority which has provided the information about the agent to the EBA and is accountable for this information. The name of the competent authority should be selected from a predefined list.
6	Name of the natural or legal person on behalf of which the agent provides payment services	Text (250 characters)	The official name of the natural or legal person on behalf of which the agent provides payment services should be entered in free text using any of the following language character sets: Hellenic Alphabet, Cyrillic and Latin. The name of the natural or legal person should be provided in the national language of the respective Member State. Countries that use the Hellenic Alphabet or Cyrillic script should also provide either a transcription of the natural or legal person's name into the Latin alphabet, or a translation or an alternative name of the natural or legal person in another language based on the Latin alphabet. In countries where there is more than one official national language, all official names of the natural or legal person must be entered.
7	National identification number of the natural or legal person on behalf of which the agent provides payment services	Alphanumeric (50 characters)	The national identification number could be one of the following codes used by the home CA that provides information to the EBA: National identification number for natural and legal persons used in the respective Member State; Legal entity identifier – a code that allows legally distinct entities that engage in financial transactions to be uniquely identified; Authorisation number – a number or code appointed to an authorised payment or electronic money institution by the competent authority of a Member State in the territory of which the entities have been established; Registration number – a number or code used by the competent authority of a Member State in its national public register; Other equivalent means of identification – any means of identification of natural and legal persons used by the competent authority in its national public register.
8	Current registration status of the agent	Text (10 characters)	Current registration status of the agent chosen from a pre-defined list: 1. Active 2. Inactive



Table 7 – Format of the information on institutions referred to in points (4) to (23) of Article 2(5) of Directive 2013/36/EU that are entitled under national law to provide payment services

		T	national law to provide payment services	
Row	Field	Maximum length	Format	
		of the field		
1	Type of natural or legal	Pre-defined text	Pre-defined option – 'Institution referred to in points (4) to (23) of Article 2(5) of Directive 2013/36/EU	
	person		that is entitled under national law to provide payment services'	
2	Name of the institution	Text (250 characters)	The official name of the institution referred to in points (4) to (23) of Article 2(5) of Directive 2013/36/EU	
	referred to in points (4) to		that is entitled under national law to provide payment services should be entered in free text using any of	
	(23) of Article 2(5) of		the following language character sets: Hellenic Alphabet, Cyrillic and Latin. The name of the institution	
	Directive 2013/36/EU that		should be provided in the national language of the respective Member State. Countries that use the	
	is entitled under national		Hellenic Alphabet or Cyrillic script should also provide either a transcription of the institution's name into	
	law to provide payment		the Latin alphabet, or a translation or an alternative name of the institution in another language based on	
	services		the Latin alphabet.	
			In countries where there is more than one official national language, all official names of the institution	
			must be entered. The names must be separated by a '/' character.	
3	Commercial name of the	Text (250 characters)	The commercial name of the institution referred to in points (4) to (23) of Article 2(5) of	
	institution referred to in		Directive 2013/36/EU that is entitled under national law to provide payment services should be entered in	
	points (4) to (23) of		free text using any of the following language character sets: Hellenic Alphabet, Cyrillic and Latin. Countries	
	Article 2(5) of		that use the Hellenic Alphabet or Cyrillic script should also provide either a transcription of the institution's	
	Directive 2013/36/EU that		commercial name into the Latin alphabet, or a translation or an alternative commercial name of the	
	is entitled under national		institution in another language based on the Latin alphabet.	
	law to provide payment		If the institution uses more than one commercial name, all of the commercial names of the institution	
	services		could be entered. These names must be separated by a '/' character.	
			This field is optional for competent authorities to provide.	
4	Address of the head office		The address of the head office of the institution referred to in points (4) to (23) of Article 2(5) of	
	of the institution referred		Directive 2013/36/EU that are is entitled under national law to provide payment services should be	
	to in points (4) to (23) of		entered in free text using any of the following language character sets: Hellenic Alphabet, Cyrillic and Latin.	
	Article 2(5) of		The address should be provided in the national language of the respective Member State. Countries that	
	Directive 2013/36/EU that		use the Hellenic Alphabet or Cyrillic script should also provide a transcription into the Latin alphabet or a	
	are is entitled under		common English name.	
	national law to provide		In countries where there is more than one official national language, the address should be provided in at	
	payment services		least one official language of the jurisdiction. If the address is provided in more than one official national	
			language, they should be separated by a '/' character.	
4.1.	Country	Pre-defined text	The Member States of the EU and the other EEA countries:	
		(options)	Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany,	



4.2. 4.3.	City Address	Text (100 characters) Text (50 characters per address line)	Greece, Hungary, Iceland, Ireland, Italy, Latvia, Liechtenstein, Lithuania, Luxembourg, Malta, Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, United Kingdom.
4.4.	Postcode	Text (35 characters)	
5	National identification number of the institution referred to in points (4) to (23) of Article 2(5) of Directive 2013/36/EU that is entitled under national law to provide payment services	Alphanumeric (50 characters)	The national identification number could be one of the following codes used by the home CA that provides information to the EBA: National identification number for natural and legal persons used in the respective Member State; Legal entity identifier – a code that allows legally distinct entities that engage in financial transactions to be uniquely identified; Registration number – a number or code used by the competent authority of a Member State in its national public register; Other equivalent means of identification – any means of identification of natural and legal persons used by the competent authority in its national public register.
6	The name of the competent authority responsible for the operation of the national public register	Text (100 characters)	The name of the competent authority which has provided the information about the payment institution to the EBA and is accountable for this information. The name of the competent authority should be selected from a pre-defined list.



Table 8 – Format of the information on service providers carrying out services under points (i) and (ii) of point (k) and point (l) of Article 3 of Directive (EU) 2015/2366

Row	Field	Maximum length	Format
		of the field	
1	Type of natural or legal	Pre-defined text	Pre-defined option – 'Service provider excluded from the scope of PSD2'.
	person		
2	Name of the service provider excluded from the scope of PSD2	Text (250 characters)	The official name of the service provider excluded from the scope of PSD2 should be entered in free text using any of the following language character sets: Hellenic Alphabet, Cyrillic and Latin. The name of the service provider should be provided in the national language of the respective Member State. Countries that use the Hellenic Alphabet or Cyrillic script should also provide either a transcription of the service provider's name into the Latin alphabet, or a translation or an alternative name of the service provider in another language based on the Latin alphabet. In countries where there is more than one official national language, all official names of the service provider must be entered. The names must be separated by a '/' character.
3	Commercial name of the service provider excluded from the scope of PSD2	Text (250 characters)	The commercial name of the service provider excluded from the scope of PSD2 should be entered in free text using any of the following language character sets: Hellenic Alphabet, Cyrillic and Latin. Countries that use the Hellenic Alphabet or Cyrillic script should also provide either a transcription of the service provider's commercial name into the Latin alphabet, or a translation or an alternative commercial name of the service provider in another language based on the Latin alphabet. If the service provider excluded from the scope of PSD2 uses more than one commercial name, all of the commercial names of the service provider could be entered. These names must be separated by a '/' character. This field is optional for competent authorities to provide.
4	Address of the service provider excluded from the scope of PSD2		The address of the service provider's head office should be entered in free text using any of the following language character sets: Hellenic Alphabet, Cyrillic and Latin. The address should be provided in the national language of the respective Member State. Countries that use the Hellenic Alphabet or Cyrillic script should also provide a transcription into the Latin alphabet or a common English name. In countries where there is more than one official national language, the address should be provided in at least one official language of the jurisdiction. If the address is provided in more than one official national language, they should be separated by a '/' character.
4.1.	Country	Pre-defined text (options)	The Member States of the EU and the other EEA countries: Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Iceland, Ireland, Italy, Latvia, Liechtenstein, Lithuania, Luxembourg, Malta, Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, United Kingdom.
4.2.	City	Text (100 characters)	



4.3.	Address	Text (50 characters	
		per address line)	
4.4.	Postcode	Text (35 characters)	
5	National identification number of the service provider excluded from	Alphanumeric (50 characters)	The national identification number could be one of the following codes used by the home CA that provides information to the EBA: National identification number for natural and legal persons used in the respective Member State;
	the scope of PSD2		Legal entity identifier – a code that allows legally distinct entities that engage in financial transactions to be uniquely identified;
			Registration number — a number or code used by the competent authority of a Member State in its national public register;
			Other equivalent means of identification – any means of identification of natural and legal persons used by the competent authority in its national public register.
6	The name of the competent authority responsible for the	Text (100 characters)	The name of the competent authority which has provided the information about the service provider excluded from the scope of PSD2 to the EBA and is accountable for this information. The name of the competent authority should be selected from a pre-defined list.
	operation of the national public register		
7	Description of the	Text (up to 500	The description of the activities of the service provider excluded from the scope of PSD2 should be
	activities of the service provider excluded from the scope of PSD2	characters)	entered in free text using any of the following language character sets: Hellenic Alphabet, Cyrillic or Latin. The description of the activities of the service provider should be provided in the national language of the respective Member State.
8	Exclusion under which the	Multiple pre-defined	Exclusion under which the service provider carries out activities chosen from a pre-defined list:
	service provider carries	options	1. Services based on specific payment instruments that can be used only in a limited way that meet one of
	out activities		the following conditions:
			1.1. instruments allowing the holder to acquire goods or services only in the premises of the issuer or within a limited network of service providers under direct commercial agreement with a professional
			issuer 1.2. instruments which can be used only to acquire a very limited range of goods or services
			or
			2. Payment transactions by a provider of electronic communications networks or services provided in addition to electronic communications services for a subscriber to the network or service:
			2.1. If for purchase of digital content and voice-based services, regardless of the device used for the purchase or consumption of the digital content and charged to the related bill



			2.2. performed from or via an electronic device and charged to the related bill within the framework of a charitable activity or for the purchase of tickets
9	Current registration status	Text (up to 10	Current registration status of the service provider excluded from the scope of PSD2 chosen from a pre-
	of the service provider	characters)	defined list:
	excluded from the scope		1. Active
	of PSD2		2. Inactive



6. Accompanying documents

6.1 Cost-benefit analysis/impact assessment

Articles 10(1) and 15(1) of the EBA Regulation provide that, when any regulatory or implementing technical standards developed by the EBA are submitted to the Commission for adoption, they should be accompanied by an analysis of 'the potential related costs and benefits'. This analysis should provide an overview of the findings regarding the problem to be dealt with, the solutions proposed and the potential impact of these options.

A. Problem identification

PSD2 aims to improve the set of rules on payment services across the European Economic Area (EEA). The Directive updates the existing rules with a view to enhancing transparency, efficiency and confidence within the EU-wide single market for payments.

More specifically, one of the objectives of the Directive is to enhance the supervisory and monitoring activity of payment service providers in order to better protect consumers and to make the use of payment services safer.

Currently, payment service providers are required to submit information to competent authorities when applying for authorisation (Artide 5). Furthermore, each Member State has to establish a public register including (i) authorised payment institutions, their agents and foreign branches; (ii) natural and legal persons benefiting from an exemption pursuant to Article 32 or 33, and their agents; (iii) the institutions referred to in Article 2(5) that are entitled under national law to provide payment services; (iv) service providers excluded from the scope of PSD2 carrying out services under points (i) and (ii) of point (k) and point (l) of Article 3 of Directive (EU) 2015/2366; and (v) electronic money institutions⁴. These public registers should also provide information about the payment services for which the payment institution is authorised or for which the natural or legal person has been registered (Article 14).

The growth of cross-border payment services entails the need for uniform and standardised information about payment service providers across the EU⁵. Different levels of information in different Member States could indeed negatively affect transparency within the market.

⁴ In this context, see also: Final Guidelines on Authorisations of Payment Institutions (EBA-GL-2017-09) 11 July 2017.

⁵ EBA Consumer trends report 2016,



An adequate level of transparency would prevent the risk of inappropriate conduct by payment service providers. This would benefit both consumer protection and confidence in the market, fostering the development of innovative payment services within the EU⁶. More effective reporting of information about service providers would also improve the supervisory and monitoring activity, avoiding regulatory arbitrage.

In this regard, the Directive mandates the EBA to set out an electronic central register containing the information notified by competent authorities that is included in their public registers in accordance with Article 14 (Article 15(2)).

The aim is to improve the level of available information about payment services and providers within the EU. Consistent with this, 'EBA shall make the register publicly available on its website, and shall allow for easy access to and easy search for the information listed, free of charge' (Article 15(1)).

In this context, EBA has to provide 'technical requirements on development, operation and maintenance of the electronic central register and on access to the information contained therein' (Article 15(4)) and to define 'details and structure of the information to be notified, including the common format and model in which this information is to be provided' (Article 15(5)).

B. Policy objectives

These technical standards aim to define technical requirements and processes in order to 'develop, operate and maintain an electronic, central register that contains the information as notified by the competent authorities' (Article 15(1)).

This mandate given to the EBA fulfils the general objectives of PSD2 with reference to the improvement of information exchange between competent authorities, transparency in the payment services market and ensuring a high level of consumer protection.

The development of the central register will enhance the level of information available for stakeholders in the market, which will contribute to creating a more effective supervisory framework for payment services. This will contribute to monitoring financial innovation⁷ and to further integrating the EU payment services market.

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⁶ See also: European Central Bank, The future of retail payments: opportunities and challenges, Joint conference of the ECB and the Oesterreichische Nationalbank, 12-13 May 2011.

⁷ EBA Work Programme (2017),

https://www.eba.europa.eu/documents/10180/1617016/EBA+Revised+2017+Work+Programme.pdf/59d29b87-d9ca-415d-bdbe-6ebdd54705e8



Accordingly, a significant and harmonised level of information available in the market would allow consumers to be able to make well-informed decisions when using payment services⁸.

C. Options considered

For the development of these technical standards, the EBA has considered technical options relating to the transmission of information by CAs to the EBA and the details of the information on natural and legal persons contained in the EBA Register.

Options for the development of technical standards on transmission of information by CAs to the EBA

Transmission of information by CAs to the EBA could be carried out by the following options:

Option 1.A: Automated transmission of information whereby the whole set of information contained in the national public registers is transmitted to the EBA Register;

Option 1.B: Automated transmission of information whereby only newly added or modified information in the national public registers is transmitted to the EBA Register.

Option 1.A would require that the whole set of information contained in national public registers be reloaded in the EBA Register when any information is inserted or modified in the respective national public register.

This process would ensure lower implementation costs and time for both CAs and the EBA, since the technological solution is not as complicated as the one in Option 1.B and would be quicker and easier to implement. The operational costs for EBA would also be sustainable because the required resources for technological and manual support will be less. This is because the application of the EBA Register would not need to communicate automatically with 28 different national public registers, the applications of which have different technological solutions, and the information in which is not standardised.

Furthermore, the EBA would not have to match the information contained in its central electronic register to the information on the national public registers.

Moreover, the EBA would not need to validate the content of the information provided from the applications of the national public registers to the application of the EBA Register.

Option 1.B would require CAs to transmit to the EBA Register only the information that has been added or amended in their national public registers.

⁸ European Commission, Consumer financial services policy, https://ec.europa.eu/info/business-economy-euro/banking-and-finance/consumer-finance-and-payments/consumer-financial-services/consumer-financial-services-policy en#relatedlinks



This option would imply higher operational costs due to the ongoing maintenance that would need to be carried out by CAs in the process of transmission of information to the EBA.

Furthermore, the implementation process would take more time than Option 1.A because CAs would have to further update the applications of their national public registers in order to establish the interface with the application of the EBA Register. For Option 1.B, the maintenance costs for the EBA are expected to be higher.

Consequently, Option 1.A is the preferred option.

Options for the development of technical standards on details of the information about natural and legal persons contained in the EBA Register

The level of detail of the information contained in the EBA Register could comply with the following options:

Option 2.A: More detailed information about different natural and legal persons contained in the EBA Register;

Option 2.B: Less detailed information about the different natural and legal persons contained in the EBA Register.

Option 2.A would demand that national competent authorities require further information in addition to what is already laid down by PSD2.

The aim of the option is to make the register able to provide more granular information. This implies that CAs would provide additional information to the information explicitly required under PSD2 on an optional basis.

Option 2.A would imply that the information contained in the EBA Register will not be consistent for all Member States, because part of the optional information might not be available for all the Member States, given the heterogeneity of the level of granularity of the information contained in the national public registers across EU.

Option 2.B implies less detailed information, which would be mandatory for all CAs to provide. The information required would include only the information contained in the national public registers and information which is made or could be made publicly available by the majority of the CAs on their national public registers⁹.

The aim of the option is to ensure a minimum level of information to be provided by all the CAs. Option 2.B would allow the EBA to include in the central register standardised and homogeneous

 $^{^{9}}$ The information to be included would be only the information deemed necessary for the objectives of PSD2 related to the EBA register.



information consistent with the proportionality principle. Furthermore, the information required would be easy to gather and it would not imply substantial additional costs for either payment service providers or competent authorities.

Consequently, Option 2.B is the preferred option.

Options for the development of technical standards for the automated download of the content of the EBA Register

The functionality to allow the automated download of the information from the EBA Register could be developed according to the following options:

Option 3.A: To introduce an open API for the automated searching and retrieval of data from the EBA Register;

Option 3.B: To introduce a functionality to automatically download the whole content of the EBA Register.

Option 3.A would allow external users to automatically search and retrieve information from the EBA Register.

The open API functionality would facilitate up-to-date straight-through processing of data by the industry and reduce the operational risk for the industry stakeholders, since manual searching of information can be prone to errors.

Additionally, Option 3.A would prevent market participants from having to develop different automated solutions for searching and retrieval of information from the divergent national registers or, as an alternative, having to hire additional staff for manual searching of information.

On the other hand, the introduction of the open API functionality would result in a significant increase in the implementation and operational costs for the EBA.

Currently, the EBA IT infrastructure is able to serve only users from Member States (the CAs) because of its current design. Given this, establishing an unlimited number of connections for all external users to search and retrieve information from the EBA Register would imply a significant increase in the size of the envisaged IT platform that needs to be developed for the purposes of the EBA Register.

In the light of the above, the introduction of the open API functionality would need a comprehensive change in the design of the EBA IT infrastructure that is not considered to be feasible at this stage. If this option were to be introduced, the EBA IT infrastructure would need to allow an unknown number of market participants to access the application of the EBA Register. Consequently, EBA would then need to sign service level agreements with these users, provide them with support, provide and verify access credentials, maintain the functionality 24/7 and, last



but not least, develop a more robust application for the EBA Register that would ensure the same level of performance, availability and security.

The EBA considers the open API an additional functionality that is not provided by PSD2, which would imply unsustainable maintenance costs for the EBA and require adequate resources for its development.

In conclusion, it is reasonable to state that Option 3.A could hinder, or delay, the development of the EBA Register.

Option 3.B would allow the content of the EBA Register to be available for automated download at any given time as a standardised file. This file would be updated by the EBA at least twice a day at pre-specified time-slots¹⁰.

This option would address the potential problems that would arise for the EBA from the implementation of the API functionality in terms of increasing development and operational costs for the EBA. Furthermore, Option 3.B would not hinder the development of the EBA Register and it would not increase the security risk. This is because the automated download of the whole content of the EBA Register as a standardised file is considered to be feasible using the current EBA IT infrastructure and would not have an impact on the performance, availability and security of the EBA Registeringeneral.

At the same time, this option would provide a solution that is able to ensure a significant increase in transparency, a higher level of consumer protection and improved cooperation between competent authorities. This would be fully in line with the objectives of PSD2 related to the EBA Register.

Consequently, Option 3.B has been introduced.

D. Cost-benefit analysis

These technical standards aim to define requirements and procedures in order to develop the EBA Register. This will affect payment service providers, competent authorities, consumers and EBA.

In particular, the technical standards assessed refer (i) to the approaches and procedures to carry out the transmission of information by CAs to the EBA; (ii) to the detail of the information contained in the EBA Register; and (iii) to the functionality of the automated download of the content of the EBA Register.

¹⁰ In order to reflect all the information provided (if any) by CAs throughout the day, the EBA would introduce specific slots: one in the morning after the automated files are processed and one in the afternoon. These files would also include the date and time stamp of the last update of the information in the EBA Register from the respective CA.



An easier and more effective access to the information about all natural and legal person providing payment services would improve consumer protection. Therefore, expected benefits are related to the possibility of enhancing the level of transparency within the EU payment services market. In this regard, it is reasonable to state that ensuring an appropriate level of payment security and consumer protection is a key element in favouring the development of accessible and innovative payment services¹¹.

A higher level of transparency about the operation of payment service providers could also increase consumers' confidence. This would facilitate the deployment of payment services across Member States, creating further business opportunities for service providers and fostering the safe exchange of goods and services within the European single market 12.

Moreover, the harmonisation of the level of detail of information required about payment service providers would allow competent authorities to ensure the level playing field and to avoid regulatory arbitrage.

On the other hand, the technical standards assessed could imply implementation, compliance and maintenance costs for competent authorities.

However, these costs are expected to be not too significant if the information to be collected and reported would be standardised and homogeneous consistent with the proportionality principle (Option 2.B); or the information reporting process would follow an automated procedure allowing CAs to avoid relevant operational costs and delays in the implementation process (Option 1.A). Likewise, the functionality to download the whole content of the EBA Register will not result in significant operational costs for the EBA.

In conclusion, the benefits arising from these technical standards would affect not only consumers but also the overall EU financial and economic system and, most importantly, they are expected to exceed the costs that competent authorities could face.

¹¹ EBA Annual Report 2016,

http://www.eba.europa.eu/documents/10180/1879387/EBA+Annual+Report+2016.pdf/4c08e80f-ea87-4643-90cba 2a 02230c0a 2

 $^{^{12}}$ See also: European Commission, Green Paper on retail financial services: Better products, more choice, and greater opportunities for consumers and businesses, 10 December 2015.



6.2 Feedback on the public consultation

Summary of the responses to the consultation and the EBA's analysis

No	Comments	Summary of responses received	EBA analysis	Amendments to the proposal		
Feed	Feedback on the general comments					
1	General comment on the ITS	One respondent suggested that the EBA should include in its register a 'blacklist' of PSPs, i.e. legal entities, that are not authorised under PSD2 but which offer payment services. The respondent is of the view that, by doing so, market participants would be able to identify fraudulent third parties acting as PSPs.	All PSPs that are duly authorised will be induded in the EBA Register. Therefore, if an undertaking is not induded in the register, it indicates that the respective undertaking has not been authorised or registered under PSD2. As most CAs do not make information on blacklisted undertakings publidy a vailable on their NPRs, the EBA cannot do so either. It should be noted that the EBA will indude in its register information that the majority of the CAs collect and publish on their NPRs. Finally, some CAs publish wamings about unauthorised fraudulent payment and/or electronic money institutions on their websites but they are separate from the NPRs under PSD1 or PSD2.	None.		
2	General comment on the RTS	Several respondents suggested that the EBA should introduce in the EBA Register an exclusive unique identifier for each PSP. They were of the view that this would ensure more accurate search results and simplify searching for information for the users of the registers. Two of these respondents were of the view that this identifier should be derived from the country of the PSP and the unique identification number of the PSP.	The EBA is of the view that there would not be any added value in introducing an additional identifier only for the purposes of the EBA Register. The EBA Register will contain an identifier that matches the registration number or equivalent means of identification used by the CA in its NPR. This identifier will also allow the user of the EBA Register to find the respective undertaking in the respective NPR. Moreover, having more than one identifier in the EBA Register might confuse consumers and other users of the register and would bring about inconsistency in the information in the register. Finally, both the country of origin and the identification number of the undertaking will be entered in the EBA Register.	None.		
3	Annex of the ITS	One respondent recommends that EBA should make data fields in Annex1 of the ITS compatible with the ISO 20022	One of the objectives of the EBA Register as provided by PSD2 is to increase transparency of the operations of payment and electronic money institutions in the EU. Its main purpose is therefore to aggregate information provided by the CAs and to make this	None.		



No	Comments	Summary of responses received	EBA analysis	Amendments to the proposal
		data dictionary to facilitate interoperability and compatibility with modern financial systems.	information publicly available in electronic format. Its purpose is not to provide information that is useful for interoperability between the systems of the market participants in the process of provision of payment services.	
			Furthermore, the EBA's view is also that the requirements for the EBA Register should not refer to any existing industry standards, to avoid introducing any limitations in the process of development of the register itself.	
4	Annex of the ITS	Two respondent suggested increasing the number of characters for the addresses used in Annex1 of the ITS from 50 characters to 75 characters because, in some cases, the address lines might be longer than 50 characters.	The EBA agrees with the suggestion, especially taking into account the various words and names used in the different languages in the EU, which can have different lengths. Therefore, the EBA has increased the characters for the dity in Annex I of the ITS from 70 to 100. However, it should be noted that the number of the characters of the address is limited not to 50, but to 50 per line; therefore, the EBA came to the conclusion that no change should be introduced in the number of characters for the addresses.	The EBA changed the number of characters for the city in all tables of the Annex of the ITS from 70 to 100 characters.
5	Annex of the ITS	One respondent suggested that the ISO country code used in AnnexI of the ITS for the United Kingdom should be changed from 'UK' to 'GB' in order to comply with the standard.	The EBA agrees with the respondent's view and has amended the code accordingly to comply with the ISO standard. In addition, for greater darity and consistency with the approach taken for the EBA Credit Institution Register (CIR), the EBA has introduced the full names of all the countries. It should also be noted that these codes will be used only for the messages between CAs and the EBA in the process of automatic transmission of information. The full names of the countries will be displayed in the EBA Register. Finally, the EBA has added the EEA countries that are not part of the EU.	The EBA introduced the full names of the EEA countries in the Annex of the ITS, instead of referring to their ISO codes.
6	General comment on the RTS	A few respondents expressed their preference that the EBA should indude in the RTS a spedfic reference to service level agreements between CAs and the EBA.	The EBA does not see any added value in having a reference in the RTS to any additional documents or agreements that need to be developed/conduded in the process of developing and operating the EBA Register. The EBA is of the view that all important and substantial requirements related to the development, operation and maintenance of the EBA Register are included in the RTS.	None.
7	General comment on the ITS	Several respondents were of the view that the users of the EBA Register should be able to identify and check the status of authorisation/registration of account information service	The EBA is of the view that the authorisation and registration status could always be checked in the EBA Register. If the undertaking is authorised or registered, it will be contained in the register. Furthermore, according to Article 15(3) of PSD2, it is the responsibility of the competent	None.



No	Comments	Summary of responses received	EBA analysis	Amendments to the proposal
		providers (AISPs) and payment initiation service providers (PISPs), especially in the cases where these PSPs try to access payment service users' accounts. The respondents suggested that this would ensure a higher level of consumer protection, lead to a decrease in fraud levels and increase the importance of the register.	authorities of the Member States, not the EBA, that the information submitted to, and contained in, the EBA Register is accurate and up to date.	
8	General comment on the RTS	One respondent suggested that the EBA should establish the processing and storage centres of the EBA Register in locations within the EU.	The EBA arrived at the view that such a specification is too detailed to meet the objective of developing these technical standards at a high level. Also, the EBA has considered that the establishment of the processing and storage centres of the EBA Register should be decided during the IT project for the development of the EBA Register, in which many various factors that might influence this decision will be taken into account.	None.
9	General comment on the RTS	One respondent suggested that the EBA should introduce a communication channel that public users of the EBA Register could use for notifying EBA about any incident related to the operation of the register.	The EBA agrees with the respondent that it is important to allow public users to communicate any incidents or issues related to the operation of the EBA Register. Therefore, the EBA has introduced in the RTS a requirement for the EBA to establish a designated channel for communication of incidents or issues that the public users of the register have experienced.	The EBA introduced a new paragraph in Article 14 of the RTS: Article 14(7) The EBA shall establish a designated channel for communication of incidents related to the operation of the electronic central register.
10	General comment on the RTS	A number of respondents suggested that the EBA should include a functionality in the EBA Register for user notifications ('real-time alerts') for	The EBA would like to reiterate that the one of the objectives for the EBA Register, as provided by PSD2, is to increase transparency of the operations of payment institutions in the EU. Its main purpose is to aggregate information provided by the CAs and to make this information publicly available in electronic format.	The EBA introduced two new paragraphs in Article 13 of the



No	Comments	Summary of responses received	EBA analysis	Amendments to
				the proposal
		any down-time caused by incident or maintenance work, security breach, as well as for updates on the information contained in the Register, in particular for authorisations or withdrawals of authorisation of PSPs. Some of these respondents also suggested that the EBA should inform the public users of the EBA Register about the reasons for the incident, the security risks and the recovery timing.	The EBA considers that all interested parties are in a position to check the information in the EBA Register, including all the updates made by CAs. The EBA is of the view that introducing the functionality proposed would significantly increase the implementation and operational cost for the EBA and could also result in additional delay in the development of the register. The EBA acknowledges that, for transparency reasons, the public users of the EBA Register would benefit from knowing the moment of any last changes made to the content of the register, and has, therefore, decided to introduce date and time stamps that will show the exact time when information has been manually inserted or amended in the EBA Register or when each CA last synchronised the content of its NPR with the content of the EBA Register. Moreover, the EBA is of the view that this will allow public users of the EBA Register to check the validity of the information. Regarding the information on any down-time due to incidents, maintenance work and security breaches, the EBA decided to introduce a notification on its website displaying, if the EBA Register is not available, the reasons for that and any information on the recovery of the register.	RTS: Article 13(6) The EBA shall notify public users of any unavailability of the electronic central register and provide them with information on the reasons for the unavailability and the recovery of the register. Article 13(7) The EBA shall display the information specified in paragraph (6) on its website.
				The EBA introduced a new paragraph in Article 7 of the RTS:
				Article 7(4) The EBA shall insert a date and time stamp in the manually inserted or modified information in the electronic central register. This date and time stamp shall display the moment of the last change to the



No	Comments	Summary of responses received	EBA analysis	Amendments to the proposal
				register. The EBA introduced a new paragraphin Article 8 of the RTS: Article 8(11) The EBA shall insert a date and time stamp in the information automatically transmitted to the application of the electronic central register. This date and time stamp shall display the moment of the last synchronisation between the electronic central register and time national public registers.
11	General comment on the ITS	Several respondents suggested that the information contained in the EBA Register should be standardised and harmonised; in particular, the identification codes that are used. In their view, this would reduce fragmentation between the approaches of the different CAs.	The EBA is of the view that the information contained in the EBA Register cannot be further standardised or harmonised because it is provided by different CAs with different languages and national requirements applicable to the information contained on their NPRs.	None.
12	General comment on	A few respondents were of the view that the RTS should oblige CAs to enter the authorisations or registrations, and	Article 15(2) of PSD2 requires CAs to notify the EBA of the information entered in their respective NPRs, including the information on authorisations or withdrawals of	None.



No	Comments	Summary of responses received	EBA analysis	Amendments to the proposal
	the RTS	the withdrawals of authorisations or registrations, of AISPs and PISPs in the EBA Register immediately. These respondents suggested that this would ensure that the industry stakeholders could rely on centralised, up-to-date information that would protect them from fraudulent activities carried out by unauthorised third parties.	authorisation, without delay. Furthermore, according to Artide 15(3) of PSD2, it is the responsibility of the competent authorities of the Member States, not the EBA, that the information submitted to, and contained in, the EBA Register is up to date. Therefore, the EBA is of the view that it would go beyond the mandate under Artide 15(4) of PSD2 to specify in the RTS a timeframe for the provision of information from CAs to the EBA which is different from the one provided by PSD2 itself.	
13	General comment on the RTS	One respondent suggested that the EBA should darify in the RTS who will be responsible in the event of dissimilarities and misalignments between the NPRs and the EBA Register.	According to Artide 15(3) of PSD2, it is the responsibility of the competent authorities of the Member States, not the EBA, that the information submitted to, and contained in, the EBA Register is accurate and up to date. Taking into account that the EBA Register will contain information provided by the CAs, in the event of dissimilarities or misalignments of the information between the NPRs and the EBA Register, the public users should refer to the NPRs. In order to facilitate this process, the EBA will introduce in the EBA Register hyperlinks to all NPRs of the CAs – please see the analysis of issue 86. Moreover, the technological solution for automated provision of information reduces the risk of misalignments because the content of the NPRs will be mirrored in the EBA Register.	None.
14	General comment	A few respondents requested clarification about the difference between the process of authorisation and registration. They suggested that the EBA should clarify that all CAs will be expected to perform comprehensive due diligence on the information provided as part of an application for registration, just the same as they would for an application for authorisation.	This request for darification is outside the scope of the two mandates conferred on the EBA by Article 15(4) and (5) of PSD2. The requested information could be found in the EBA Guidelines on the information to be provided for the authorisation of payment institutions and electronic money institutions and for the registration of account information service providers (EBA/GL/2017/09) and in PSD2 itself. However, by way of summary, registration is required for all natural and legal persons under Article 32 or 33 of PSD2 that benefit from exemption from the application of some of PSD2 requirements, whereas authorisation is required for all others. CAs are expected to carry out due diligence in both registration and authorisation procedures. However, it should be noted that the two procedures incur different requirements.	None.



No	Comments	Summary of responses received	EBA analysis	Amendments to the proposal
15	General comment on the RTS	A number of respondents suggested that CAs should appoint at least two staff members to enter information in the EBA Register manually to ensure continuity of the operation and reduce the operational risk.	The EBA agrees that, in order to ensure continuity of the operations related to the provision of information from CAs to the EBA and to reduce the operational risk, each CA should ensure that at least two members of its staff are responsible for inserting and modifying information in the EBA Register manually.	The EBA a mended Article 2 of the RTS in the following way: Article 2(2) Each competent authority shall appoint at least one two member of the staff internal users who shall be responsible for inserting and modifying information manually in the electronic central register of the EBA.
16	General comment	One respondent expressed concern that CAs have divergent approaches with regard to the payment services provided through agents and making them publicly available. In the view of that respondent, this might lead to gaps in the information contained in the national registers.	The EBA Register will not cover services provided through agents and therefore could not contribute to the convergence of the national practices related to the information made publicly available about the payment services provided through agents. The majority of the CAs do not tend to publish information on the payment services provided by agents on their NPRs. Many CAs consider that making publicly available information on the payment services provided by agents would be an excessive administrative burden on them and have, therefore, not included them in their NPRs. Furthermore, Article 20(2) of PSD2 requires payment institutions to remain fully liable for the acts of their agents related to the provision of payment services on their behalf. In most cases, payment services provided through agents are not different from the payment services provided by the payment institution on behalf of which the agent operates. From a practical perspective, payment service users and other interested parties could rely on the services for which the institution on behalf of which the agent	None.



No	Comments	Summary of responses received	EBA analysis	Amendments to the proposal
			provides services has been a uthorised or registered.	
17	General comment on the RTS	Some respondents suggested that the EBA should introduce dates when the EBA Register was most recently updated with information from the national public registers. These respondents are of the view that such dates would ensure transparency and reliability of the information in the EBA Register.	The EBA acknowledges that, for transparency reasons, public users of the EBA Register would benefit from knowing when the last changes to content of the register were made, and has, therefore, decided to introduce date and time stamps that will show the exact time when information has been manually inserted or amended in the EBA Register or when each CA last synchronised the content of its NPR with the content of the EBA Register. Moreover, the EBA is of the view that this would allow the public users of the EBA Register to check the validity of the information.	See the a mendments made in issue 10.
18	General comment	One respondent was of the view that the EBA should define common requirements for the national registers.	The requirements for the NPRs derive from the national legislative acts transposing PSD2 in the respective jurisdictions and, therefore, the EBA is legally not able to impose requirements on the NPRs themselves. By contrast, the EBA is able to stipulate requirements for the NPRs that are related to the provision of information from the CAs to the EBA, and these are specified in the RTS.	None.
19	General comment	One respondent requested that the EBA darify what will happen if the EBA Register and the NPRs are not synchronised, especially if the use of the EBA Register gives rise to complaints or claims.	According to Artide 15(3) of PSD2, it is the responsibility of the competent authorities of the Member States, not the EBA, that the information submitted to, and contained in, the EBA Register is accurate and up to date. Taking into account that the EBA Register will contain information provided by the CAs, if the information between the NPRs and the EBA Register is not synchronised, public users should always refer to the NPRs. In order to facilitate this process, the EBA will introduce in the EBA Register hyperlinks to all NPRs of the CAs – please see the analysis of issue 86. The EBA decided to introduce date and time stamps that will show the exact time when information has been manually inserted or amended in the EBA Register or when each CA last synchronised the content of its NPR with the content of the EBA Register.	None.
20	General comment on the RTS	One respondent was of the view that the RTS do not provide the role of the EBA.	The EBA is of the view that its role with regard to the EBA Register is established by PSD2. Article 15(1) of PSD2 requires the EBA to develop, operate and maintain the EBA Register. It further darifies that the EBA shall be responsible for the accurate presentation of the information contained in the EBA Register. Furthermore, Article 3 of the RTS requires the EBA to be responsible for managing the list of internal users, providing the authentication details to these users and providing	None.



No	Comments	Summary of responses received	EBA analysis	Amendments to the proposal
			s upport to the competent authorities.	
21	General comment	One respondent requested darification about the payment services that should be considered cross-border.	This request for darification is outside the scope of the two mandates conferred on the EBA by Article 15(4) and (5) of PSD2. However, by way of summary, the payments to be considered cross-border are payment transactions initiated by a payer or by or through a payee where the payer's PSP and the payee's PSP are located in different Member States.	None.
22	General comment on the RTS	One respondent suggested that the RTS should contain enforcement measures for the EBA in case CAs provide incorrect information.	The EBA is of the view that this suggestion goes beyond the mandates under Article 15(4) and (5) of PSD2 and should not be specified in the RTS. According to Article 15(3) of PSD2, it is the responsibility of the competent authorities of the Member States, not the EBA, that the information submitted to, and contained in, the EBA Register is accurate and up to date. Therefore, in the event of provision of inaccurate information from a CA, the general procedures should apply. It should also be noted that Article 2(4) of the EBA Regulation provides that, 'in accordance with the principle of sincere cooperation pursuant to Article 4(3) of the Treaty on European Union, the parties to the ESFS shall cooperate with trust and full mutual respect, in particular in ensuring the flow of appropriate and reliable information between them.'	None.
23	Annex of the ITS	One respondent requested darification on the relationship between Tables 1 and 5 of the ITS with regard to account information services.	Table 1 of the Annex of the ITS specifies the format of the information to be provided for payment institutions. The information includes account information services which payment institutions can provide. Table 5 of the Annex of the ITS specifies the format of the information to be provided for exempted electronic money institutions. The information does not include account information services because according to Article 32(1) of PSD2 exempted payment institutions cannot provide account information services; therefore, exempted electronic money institutions should also not be able to provide account information services when applying the mutatis mutandis principle according to Article 111(1) of PSD2.	None.
24	General comment	Several respondents were of the view that the EBA Register should be the only source of legally binding information about third party providers (TPPs) and should prevail over NPRs.	Article 15(2) of PSD2 requires CAs to notify the EBA of the information entered in their respective NPRs. In addition, according to Article 15(3) of PSD2, it is the responsibility of the competent authorities of the Member States, not the EBA, that the information submitted to, and	None.



No	Comments	Summary of responses received	EBA analysis	Amendments to the proposal
		In their view, this would allow the register to be used for operational purposes by industry stakeholders.	contained in, the EBA Register is up to date. Therefore, the EBA Register cannot be the only source of legally binding information on PSPs because it replicates the information contained on the CAs' NPRs. Furthermore, the main purpose of the EBA Register is to aggregate information provided by the CAs and to make this information publidy available in electronic format.	
25	General comment on the RTS	A few respondents suggested that the EBA develop the register in partnership with the industry. These respondents were of the view that joint initiatives could potentially address the EBA's concerns around the cost of development and operation of the register.	Article 15(1) of PSD2 provides that [only] the EBA shall develop, operate and maintain an electronic central register that contains information as notified by CAs. Therefore, the EBA cannot develop the EBA Register in partnership with the industry. Article 15(2) of PSD2 provides that CAs shall, without delay, notify the EBA of the information entered in their NPRs. Furthermore, according to Article 15(3) of PSD2, it is the responsibility of the competent authorities of the Member States, not the EBA, that the information submitted to, and contained in, the EBA Register is accurate and up to date. Therefore, the EBA cannot rely on parties other than the CAs for provision and/or cross-checking of information to the EBA Register. Furthermore, the EBA is of the view that the functionality of the EBA Register referred to in issue 49 would allow industry stakeholders to check automatically the information contained in the EBA Register.	None.
26	General comment	A few respondents suggested, if credit institutions are not included in the EBA Register, that the EBA should inform the public users of the register of the existence of another EBA register for credit institutions — the EBA Credit Institutions Register.	Credit institutions and notifications about existing registers of credit institutions are outside the scope of the two mandates conferred on the EBA by Artide 15(4) and (5) of PSD2. Furthermore, the purpose of the EBA Register as provided by PSD2 is to establish a list of all authorised or registered payment and electronic money institutions in the EU. PSD2 does not provide that the purpose of the EBA Register should be to update the already existing registers for other financial institutions within the scope of the EBA.	None.
27	General comment	A few respondents suggested that the EBA should obtain information about credit institutions from the EBA Credit Institutions Register.	Credit institutions are outside the scope of the two mandates conferred on the EBA by Article 15(4) and (5) of PSD2. See also the analysis of issue 83.	None.



No	Comments	Summary of responses received	EBA analysis	Amendments to the proposal
28	General comment on the RTS	One respondent suggested that the EBA should darify in the RTS what exactly is meant by 'days' and 'business days' in order to understand these terms.	The EBA agrees that these terms should be aligned throughout the RTS. In order to achieve greater darity, the EBA has decided to refrain from referring to 'business days'. Instead, all such references are aligned as 'days'.	The EBA a mended Article 14(5) of the RTS in the following way: Article 14(5) The EBA shallrespond to the queries referred to in paragraph (4) without undue delay by the end of the day. within the working hours of the EBA business
29	General comment on the RTS	One respondent is of the view that the access to the EBA Register should be further clarified by including the type of users allowed to access it, maximum number of users per institution and process for getting access to the register.	The EBA would like to highlight that the types of users are specified in Articles 2 and 5 of the RTS. Regarding the number of staff of each CA that would be able to manually insert information in the EBA Register, the EBA is of the view that this should be left to the discretion of each CA. By doing so, CAs would be able to better manage the operational risk related to the provision of information to the EBA Register. Regarding the process for getting access to the EBA Register, the EBA is of the view that Articles 2, 3 and 4 of the RTS dearly provide the steps for the process of getting access for manual insertion or modification of information by staff of the CAs. There would not be any additional certification procedure.	None.
30	General comment	One respondent asked a question related to the actions that PSPs need to take in the event of an outage of the EBA Register or the national registers and whether PSPs should stop providing payment services or continue carrying out activities at a higher risk.	This issue does not fall within the scope of the two mandates conferred on the EBA by Article 15(4) and (5) of PSD2. The EBA is of the view that there should not be any link between the availability of the EBA Register and the ability of payment and electronic money institutions to provide payment services.	None.



No	Comments	Summary of responses received	EBA analysis	Amendments to the proposal	
Feed	eedback on responses to question 1				
31	Articles 8, 9 and 10 of the RTS	The majority of the respondents were of the view that all CAs should transmit information to the EBA Register automatically and that automated transmission of information should be used as the default method. These respondents also suggested that the manual insertion should be used only as a fall-back option. The respondents considered the manual insertion of information to be prone to errors, which might lead to discrepancies of the information between the NPRs and the EBA Register. These respondents were also of the view that the automated transmission of information would identify errors more easily, ensure faster provision of information to the EBA and ensure that the information in the EBA Register is up to date.	The EBA is of the view that CAs should have discretion to decide on the approach for provision of information to the EBA because: - some CAs have a small number of undertakings that are made publicly available on their NPR; - some CAs do not update their NPRs very frequently; - establishing an interface between the application of the NPRs and the EBA Register will be costly for implementation and support; - several CAs explicitly requested that the manual insertion of information be provided as a default option for them. According to Article 15(3) of PSD2, it is the responsibility of the competent authorities of the Member States, not the EBA, that the information submitted to, and contained in, the EBA Register is up to date.	None.	
32	Articles 9, 10 and 11 of the RTS	The majority of the respondents were of the view that the time between the update of the NPRs and the update of the EBA Register should be reduced to near real time. These respondents were of the view that, if this were not the case, the EBA Register would not be a reliable source	The EBA agrees with the views expressed by those respondents that the process for transmission of information from CAs to the EBA could be made more efficient and also that the publication of the information should be made as soon as possible after the EBA receives and validates the information. Therefore, the EBA has decided to introduce changes in Articles 7, 8 and 9 of the RTS in order to address the issues raised by those respondents. The EBA has decided to require CAs to submit information once a day when the content of the NPRs has been changed. The EBA would introduce the option for CAs to provide	The EBA introduced four new paragraphs in Article 8 of the RTS: Article 8(4) The transmission of the batch file referred to in paragraph (3)	



No	Comments	Summary of responses received	EBA analysis	Amendments to the proposal
		of information and would not be able to protect market participants from fraudulent activities carried out by unauthorised parties or institutions with withdrawn authorisations which are acting fraudulently. They also considered that any discrepancies between the information in the EBA Register and the NPRs at any given point in time would create confusion. They highlighted that it would be unacceptable if the EBA Register were updated a day after the NPRs are updated, or in some cases even longer — during the weekends (if the information is transmitted on Friday afternoon) or when the validation of the transmitted batch file fails. Therefore, those respondents considered the more appropriate option to be that with automated transmission of information which requires the application of the national registers to transmit only the newly added or modified information to the application of the EBA Register. They were of the view that there would be no time lag in the process of provision of information and that it would ensure that the information contained in the EBA Register is up to date.	any amendments to the content of their NPRs in relation to the granting or withdrawal of authorisation or registration manually, if they are unable to transmit them automatically. In the event of failed validation, CAs would be required to either resend the corrected batch file or insert the information amounally in the EBA Register without delay. CAs which transmit information automatically will be required to insert information about any changes related to the granting/withdrawal of authorisation or registration to natural and legal persons in their NPRs manually if they are not able to correct the mistakes identified in the batch file. This should also be done without delay. The EBA has also decided to introduce date and time stamps that will allow the public users of the EBA Register to be aware when information has been manually inserted or amended in the EBA Register or when each CA last synchronised the content of its NPR with the content of the EBA Register. The EBA decided not to incorporate the option, which was suggested by the majority of the respondents, that will require the application of the NPR to transmit to the application of the EBA Register only newly added or modified information in the respective NPR. The EBA is of the view that, with the newly introduced changes to the requirements for the technological solution chosen for the EBA Register, it will ensure that information is transmitted almost as quickly as it would have under the other option considered. The EBA also took into account that the option for technological solution for the transmission of a single batch file, which was chosen prior to the public consultation, would: - be less complicated to implement, both for CAs and for the EBA, which will result in quicker implementation and fewer issues faced in the process of transmission of information from CAs; - be cheaper for CAs and the EBA to implement, as well as for the EBA to maintain; and - ensure the accuracy of the information provided by CAs because the NPRs will be m	shall take place at least once on the same day when the content of a national public register has been changed. Article 8(5) If competent authorities amend the content of their national public registers in relation to the granting or withdrawal of authorisation or registration and they are unable to transmit those changes automatically, they shall insert them manually by the end of the same day. Article 8(6) The EBA shall allow the competent authorities to transmit a batch file once a day irrespective of whether the content of their national public registers has been



No	Comments	Summary of responses received	EBA analysis	Amendments to the proposal
				changed or not.
				Article 8(11) The EBA shall insert a date and time stamp in the information automatically transmitted to the application of the electronic central register. This date and time stamp shall display the moment of the last synchronisation between the electronic central register and the national public registers.
				The EBA a mended Article 8(8) of the RTS in the following way:
				Article 8(8) The information automatically trans mitted to the electronic central register of the EBA shall be made publicly a vailable in the register as soon as possible after the



No	Comments	Summary of responses received	EBA analysis	Amendments to the proposal
				batch file referred to in paragraph (3) has been processed it has been and validated by the application of the electronic central register of the EBA but at the latest by the end of the same day.
				The EBA merged paragraphs 5 and 6 of Article 9 of the RTS into one and slightly amended the draft wording. The new paragraph (5) provides:
				Article 9(5) Competent authorities which have decided to provide information to the EBA manually shall, receive a response from the application of the electronic central register of the EBA about the outcome of the data
				validation process without delay. in



No	Comments	Summary of responses received	EBA analysis	Amendments to the proposal
				real time.
				The EBA introduced a new paragraphin Article 9 of the RTS:
				Article 9(8) In the event of failed validation, competent authorities which provide information automatically, shall, by the end of the same day, transmit a corrected or updated batch file with the whole set of information or manually insert any new changes made to the content of their national public registers related to the granting or withdrawal of authorisation or registration.
33	Article 10 of the RTS	Some respondents suggested that CAs should send information to the EBA on a more frequent basis and the register should be updated accordingly, e.g. more than once a day in pre-set time slots, e.g. twice a day.	See the response to issue 32.	See the amendments made in issue 32.
34	Article 10 of	Some respondents suggested that the proposed option for automated	The EBA has introduced changes in Articles 6, 7 and 8 of the RTS to reflect the views of	See the amendments made



No	Comments	Summary of responses received	EBA analysis	Amendments to the proposal
	the RTS	transmission of information is acceptable only if in certain cases, such as authorisation or registration of a new TPP, or withdrawing the licence of a PSP, the information is updated manually without any delay.	these respondents. See the analysis of issue 32.	in issue 32.
35	Articles 8 and 9 of the RTS	One respondent suggested introducing the manual insertion of information as an exemption, e.g. when a MS has authorised or registered fewer than 10 TPPs.	See the analysis of issue 31.	None.
36	Articles 10 and 11 of the RTS	Two respondents suggested that it should be further darified what would happen if the automatically transmitted information failed to be validated by the application of the EBA Register. One of the respondents also requests darification about the information that will be made publidy available in the EBA Register if the validation fails. This respondent also suggests that, in such a scenario, the users of the registers be warmed that the information is outdated.	The EBA would like to highlight that all the issues raised by these respondents are covered in the validation procedure under Article 9 of the RTS. However, in order to allow the public users of the EBA Register to be aware when the last time was that information was updated by the respective CA, the EBA has introduced date and time stamps.	See the amendment related to the date and time stamp made in issue 32.
37	Article 10 of the RTS	One respondent raised concems that the encryption of data only during the transmission of information is not enough. Therefore, this respondent suggests that the end-points should have sufficient cyber security protection in place to ensure data integrity.	The EBA agrees with the respondent and has, therefore, introduced changes to Article 8(2) of the RTS ensuring that the transmitted information has sufficient cyber security protection in place to guarantee data integrity.	The EBA amended and reworded Article 8(2) of the RTS: Article 8(2) The EBA and the competent authorities shall ensure secure transmission of information



No	Comments	Summary of responses received	EBA analysis	Amendments to the proposal
				between the applications of their respective registers in order to safeguard the authenticity, integrity and nonrepudiation of the information transmitted, using strong and widely recognised encryption techniques.
38	Article 11 of the RTS	One respondent suggested that the validation of the information should be done against the source database – the NPRs – in order to ensure the accuracy of the information in the EBA Register.	The EBA is of the view that automatically transmitted files would also be validated by the systems of the NPRs. The validation by the EBA would provide additional insurance on the integrity of the information. The EBA will also use a format for the batch file which validates the information against the data source. It should also be noted that the batch file that is automatically transmitted from CAs to the EBA will replicate the respective NPRs and, therefore, the validation of this information could be considered validation against the data source. Furthermore, the EBA has introduced a new requirement in Article 14(2) of the RTS which requires the EBA to monitor the data and time stamps in order to ensure that the EBA Register is updated on a regular basis. It should also be noted that, according to Article 15(3) of PSD2, it is the responsibility of the competent authorities of the Member States, not the EBA, that the information submitted to, and contained in, the EBA Register is accurate. The EBA has no obligation to verify the content of the EBA Register. Article 15(1) of PSD2 requires the EBA only to be responsible for the accurate presentation of the information contained in the EBA Register.	The EBA introduced a new paragraph in Article 14 of the RTS: Article 14(2) The EBA shall monitor the regular provision and update of information in the electronic central register from the competent authorities.
39	Article 4 of	One respondent requested darification on the procedure for appointing	The EBA is of the view that CAs should have discretion to appoint members of their staff	None.



No	Comments	Summary of responses received	EBA analysis	Amendments to the proposal
	the RTS	members of the staff of CAs to be responsible for the manual provision and modification of information. The same respondent also asked if these staff members will go through a certification procedure and how their appointment will be communicated to the EBA.	to be responsible for the manual provision or modification of information. The EBA is of the view that Articles 2, 3 and 4 of the RTS dearly provide the steps for the process of provision of access for manual insertion or modification of information by staff of the CAs. There would not be any additional certification procedure.	
40	Article 10 of the RTS	A few respondents raised concems that the automated provision of information does not avoid mismatches between the information contained in the EBA Register and in the NPRs.	The EBA would like to point out that the automatically transmitted batch file will replicate the content of the respective NPR; therefore, no mismatches should occur. However, it should be noted that some NPRs could contain a greater level of detail; therefore, the only mismatch possible will be if the NPRs contain additional information which is not available in the EBA Register.	None.
41	Article 10 of the RTS	One responded requested darification about the measures taken to ensure the integrity of the data transmitted automatically from CAs to the EBA.	The RTS provides that the batch files will be encrypted during the automated transmission of information. See also the analysis of issue 37 regarding the cyber security protection of the end-points for ensuring data integrity.	See the amendments made in issue 37.
42	Articles 9, 10 and 11 of the RTS	A number of respondents were of the view that the validation for manual insertion and automated transmission of information should be the same. These respondents suggested that the validation of the automatically transmitted information should be carried out immediately after the information is sent, which will allow the respective CA to correct in a timely manner any errors that may occur.	The EBA agrees with the view of the respondents. Validation of the information which is inserted manually and the validation of the information which is transmitted automatically will be aligned. See also the analysis of issue 32.	See the amendments made in issue 32.
43	Articles 9, 10 and 11 of the RTS	One respondent suggested that data validation be automated for the proper operation of the EBA Register.	The validation of the information will be done automatically as envisaged under Artide 8 of the RTS. With regard to the time for performing the validation, see the analysis of issue 42.	None.



No	Comments	Summary of responses received	EBA analysis	Amendments to the proposal
44	Article 4 of the RTS	One respondent suggested that the EBA give more detail on the functions of the CA users of the EBA Register.	The functions of the internal users (members of the staff of CAs) are specified in Articles 4 and 7 of the RTS.	None.
45	Article 6 of the RTS	A few respondents requested more detailed information about the credentials for the authentication of the CA users, including the type of credentials, the period for which they are valid and the default values. One of these respondents also suggested for the EBA to darify how the authentication of CA users will take place.	The EBA has deliberately introduced high-level procedure and requirements because such specificities will be decided during the IT project for the development of the EBA Register. Such details will be identified once the assessment of the applicable security risks has been carried out. Furthermore, Article 6 of the RTS provides that the access to the EBA Register will require two-factor authentication.	None.
46	Article 10 of the RTS	One respondent was of the view that the EBA does not need to specify the format of the batch file because it seems to be in contrast with EBA's technologically neutral stance in other circumstances.	The EBA agrees with the respondent. The EBA has introduced high-level requirements for the development, operation and maintenance of the EBA Register and, in order to remain technologically neutral, has decided to remove the reference to 'xml'in Article 8(7) of the RTS. The EBA will use a common standard for the format of the batch file, which will be specified later during the IT project for the development of the EBA Register.	The EBA amended Article 8(7) of the RTS in the following way: The EBA shall use a common standard format offor the batch file referred to in paragraph (3) shall be "xml".
47	Articles 10 and 11 of the RTS	One respondent suggested darifying how the risks of errors will be mitigated, e.g. in the event of accidental deletion of information, including submission of a partial file in the process of automated transmission of information.	The EBA has specified in Artide 9 of the RTS that the validation response will include information about the percentage of the changes in the content of the EBA Register after processing the batch file submitted by the respective CA.	The EBA introduced one additional sentence in the end of Article 9(6) of the RTS: The outcome of the data validation process under paragraph (5) shall be communicated



No	Comments	Summary of responses received	EBA analysis	Amendments to the proposal
Feed	lback on resp	onses to question 2		by the EBA to the competent authorities in a clear and unequivocal way. The outcome of the data validation under paragraph (5) shall also include the percentage change to the content of the information previously transmitted.
48	Article 18 of	A large number of respondents from	The EBA would like to highlight that the purpose of the EBA Register as provided by PSD2	None.
46	the RTS	the payments industry suggested that the EBA should incorporate the machine-readability functionality for automated searches and download of data from the EBA Register. These respondents are of the view that introducing the machine-readability functionality will facilitate up-to-date straight-through processing of data by the industry, especially the checks of the identity and the authorisation or registration status of the undertakings, which could reduce financial losses for the industry stakeholders. Without this functionality, these	is to provide a list of all authorised or registered payment and electronic money institutions in the EU by aggregating information provided by the CAs and making it publicly available in electronic format. This would contribute to the objective of PSD2 of increasing the transparency of the operations of these institutions in the EU. The EBA sees no indication in PSD2 that would suggest that the purpose of the EBA Register is to intervene in the process of provision of payment services in the EU by providing solutions for the interoperability between the systems of the various market participants. The EBA is also of the view that introducing the functionality for applications to communicate automatically with the EBA Register, through API, by searching and retrieving the information in the EBA Register would result in a significant increase in the implementation and operational costs for the EBA and could also delay the development of the EBA Register. The EBA also considered that developing and introducing an open API for an undefined	None.



No	Comments	Summary of responses received	EBA analysis	Amendments to the proposal
		respondents suggested that the cost for the industry will increase because the market participants will have to develop different automated solutions for the divergent national registers. It will also increase costs because of the additional staff that need to be hired for manual searching of information. They also consider that any manual intervention will increase the operational risk because the searching of information will be prone to errors and time-consuming. One of the respondents also suggested that ASPSPs will bear the cost of setting up a special monitoring system, which might also result in additional fees for the other market participants.	number of external parties would significantly increase the security risk and jeopardise the availability of the register. However, the EBA acknowledged the benefits that automated search and retrieval of information would bring to some industry stakeholders and has, therefore, decided to introduce an alternative solution which was also suggested by many of the respondents. See issue 49.	
49	Article 19 of the RTS	A large number of respondents suggested that, if the machine-readability functionality could not be incorporated, the EBA should introduce an alternative solution which would allow an automated download of the full content of the EBA Register. Some of these respondents suggested that the automated download of the EBA Register should be done at pre-agreed intervals.	The EBA acknowledges the benefits that automated search and retrieval of information from the EBA Register would bring to some industry stakeholders and has, therefore, decided to introduce the functionality of the EBA Register for automated download of the full content of the register as a standardised file at pre-specified intervals. The industry stakeholders would then be able to search and retrieve information automatically from this standardised file.	The EBA introduced a new artide in the RTS (Artide 18 Download of information): Article 18(1) The EBA shall make the content of the electronic central register available for manual and automated download by public users of the register by copying the content to a



No	Comments	Summary of responses received	EBA analysis	Amendments to the proposal
				standardised file. (2) The EBA shall update the standardised file referred to in paragraph (1) at least twice a day at pre-agreed intervals. The EBA shall disclose the pre-agreed intervals for such updates. A paragraph was deleted from Artide 17 of the RTS: Artide 17(5) The user of the register shall be able to download the search results
				under paragraph (2) and the information displayed for each natural or legal person under paragraph (3) and (4) in a separate file.
50	General comment	One respondent suggested that the EBA Credit Institutions Register should also be machine-readable.	The development and operation of the EBA Credit Institutions Register is outside the scope of the mandates under Arti de 15(4) and (5) of PSD2.	None.
51	Article 18 of	One respondent suggested that the	The EBA agrees that the term 'responsible competent authority' could be interpreted in	The EBA amended



No	Comments	Summary of responses received	EBA analysis	Amendments to the proposal
	the RTS	search criterion 'responsible competent authority' be changed to 'registration/authorisation authority' because it should be darified what the remit of the responsible competent authority is.	various ways and has, therefore, changed it to 'competent authority responsible for the operation of the national public register' to darify that these are the CAs that should provide information for the EBA Register.	Article 16(1)(d) of the RTS in the following way: Article 16(1)(d) The name of the competent authority responsible for the operation of the national public register responsible competent authority;
52	Article 18 of the RTS	Several respondents suggested that the EBA Register should include the following additional search criteria: - a keyfor unambiguously identifier; - registration or authorisation date and withdrawal of authorisation date; - registration or authorisation date and withdrawal of authorisation date of branches; - payment services provided; - registration or authorisation date and withdrawal of authorisation date of agents; - search enabling the extraction of a given date or timeframe; - name search for branches and/or agents;	The EBA is of the view that all the relevant information contained in the Annex of the ITS that will be entered in the EBA Register should be used as search criteria. Therefore, the EBA has added the following search criteria: - dates of authorisation or registration; - dates of withdrawal of authorisation or registration; - services provided in the host Member State; - status of authorisation or registration. The EBA would like to highlight that some of the suggested search criteria have already been covered in the RTS, such as: - payment services provided; - search by name of agents and branches; - type of natural or legal person; - home Member State; - the name of the authority responsible for the authorisation and registration under PSD2.	The EBA introduced four new paragraphs in Article 16 of the RTS: Article 16(1)(i) The payment and electronic money services provided in the host Member State; (j) The status of authorisation or registration; (k) The date of authorisation or registration; (l) The date of withdrawal of authorisation or authorisation or registration;



No	Comments	Summary of responses received	EBA analysis	Amendments to the proposal
		- services provided in host Member States;		registration.
		- status of the natural or legal person;		
		- expiry date of licence;		
		- operationalarea;		
		- the type of natural or legal person for payment institutions/exempted payment institutions/account information service providers/electronic money institutions/exempted electronic moneyinstitutions;		
		 the name of the 'registration/authorisation authority'; 		
		- validity date range;		
		- home member state of the AISP/PISP;		
		- type of services;		
		- type of payment institution.		
53	Article 18 of the RTS	Several respondents considered that the commercial name should be used as a search criterion.	The EBA has included the commercial name of payment and electronic money institutions as a type of information that will be made publicly available because the EBA considered that this information would have a direct positive impact on consumer protection and confidence (see the analysis of issue 92), given that many consumers might know and be able to identify a certain payment or electronic money institution only by its commercial name.	None.
			As stated in the analysis of issue 52, the EBA conduded that all types of information available in the EBA Register should be used as search criteria and has, therefore, arrived at the decision to include 'commercial name'. However, taking into account that many consumers might not be able to distinguish between the commercial name and the legal	



No	Comments	Summary of responses received	EBA analysis	Amendments to the proposal
54	Article 19 of	One respondent suggested that the	name of the undertaking, the EBA decided that it should not be included as a separate search criterion butshould fall under the search criterion 'the name of the natural or legal person', which would also search for the commercial name as included in the EBA Register. The EBA is of the view that the search criterion 'the name of the natural or legal person' should also perform the search on the name of the branches in the host Member States, where applicable. The EBA would like to highlight that the national identification number is part of the	The EBA introduced
	the RTS	national identifier of the natural or legal person should be part of the search criteria and displayed as a search result in the EBA Register, because searching by the name of person might not be sufficient.	search criteria under Article 16 of the RTS. The EBA agrees with the respondent that, in order to increase transparency and help public users of the EBA Register to more easily identify the natural or legal person, the national identification number should also be included in the displayed information under Article 17(2) of the RTS.	a new paragraph in Article 17 of the RTS: Article 17(2)(b) The national identification number of the person;
55	Article 18 of the RTS	One respondent suggested that the EBA Register should be able to deal with small typos and/or misspelled words.	The EBA decided not to introduce the suggested functionality for the following reasons: - Some of the corrections or suggestions might be interpreted as promoting one undertaking over a nother. - There are different languages that should be taken into account with their specificities, which can introduce a dditional complication. - Some of the undertakings use acronyms in their names, which could be detected as 'typos' or 'misspellings'. - There are many undertakings with similar names. However, the EBA decided that in some cases the public users of the EBA Register could be aware of part of the name (which could also be a reason for 'typos' or 'misspelling') and has decided to replicate the wildcard search functionality of the EBA Credit Institutions Register.	The EBA introduced two new paragraphs in Article 16 of the RTS: Article 16(6) The EBA shall ensure that wildcard searches are available for users of the register to increase the breadth of a search by using symbols to replace individual characters and/or words.



No	Comments	Summary of responses received	EBA analysis	Amendments to the proposal
				Article 16(7) The EBA shall inform the users of the register how to use the symbols referred to in paragraph (6).
56	Article 18 of the RTS	One respondent asked the EBA to clarify the information to be provided by default access in accordance with Article 7 of the RTS (the information that will be displayed).	The EBA has darified that a menu with the search criteria will appear when public users access the EBA Register.	The EBA introduced a new paragraph in Article 5 of the RTS: Article 5(4) When public users access the electronic central register of the EBA, the website of the EBA shall display the search criteria specified in Article 16(1).
57	General comment and Article 16 of the RTS	One respondent suggested that the EBA should confirm that passporting to a host Member State will show only when the full passporting notification proædure has been completed and the passport is approved, not simply when a request for passporting has been sent.	This issue falls outside the scope of the mandates under Arti de 15(4) and (5) of PSD2. Furthermore, this matter is regulated by Arti de 28(2) and (3) of PSD2 as well as the draft RTS on the framework for cooperation and exchange of information between competent authorities for passport notifications under PSD2 (EBA/RTS/2016/08).	None.
58	Article 19 of the RTS	A few respondents suggested displaying dearly in the EBA Register when a PSP provides cross-border services. One of these respondents was of the view that the information about the host Member States where the PSP provides services should also be	The public users of the EBA Register will be able to check easily whether or not the payment or electronic money institution can provide services in another host Member State. The information about the host Member States will be available to the public users of the EBA Register but, in order to make the display of the search results more user-friendly, the EBA has decided not to include this information in the search results under Article 17(2) of the RTS. Therefore, the EBA is of the view that no further changes or	None.



No	Comments	Summary of responses received	EBA analysis	Amendments to the proposal
		displayed in the search results.	clarifications to the RTS are needed.	
59	Articles 18 and 19 of the RTS	One respondent was of the view that the search engine should enable the public users of the EBA Register to identify whether or not the undertakings in the register have provided services on any given date in the past.	The EBA is of the view that including the dates of authorisation or registration and the dates of withdrawal of the authorisation or registration will enable the public users of the EBA Register to identify whether or not an undertaking has been providing services on any given date in the past.	None.
60	Article 19 of the RTS	Some of the respondents were of the view that the EBA should display the whole set of information contained in the EBA Register in the search results.	The EBA is not convinced of the advantages of the suggestion, including because there were no strong arguments supporting it, and has retained the wording of Article 16(2) of the RTS, which requires at least one search criterion to be filled in for the EBA Register to perform the search. However, it should be noted that, for the purposes of the industry, the EBA has	None.
			introduced the functionality for automated download of the full content of the register at pre-agreed intervals.	
61	Article 19 of the RTS	One respondent requested darification of whether the users of the EBA Register will be able to download the	The EBA would like to darify that users of the EBA Register can download their search results and the information displayed for each natural or legal person, as provided by Article 17(4) of the RTS.	See the amendment made in issue 49.
	full content of the register or only parts of it.	Furthermore, the EBA has introduced the functionality for automated download of the full content of the register at pre-agreed intervals. See the analysis of issue 49.		
62	Article 19 of the RTS	A few respondents expressed concern that the list of information displayed as search results under Artide 19 of the	The EBA would like to highlight that the whole content of the EBA Register with information about all natural or legal persons in it, as specified under Article 17(3) of the RTS, will be available to public users.	None.
		RTS is very short and less than the information covered by the ITS.	However, the EBA has decided that only some of the information will be displayed as search results in order for it to be user-friendly.	
63	Articles 18 and 19 of the RTS	One respondent suggested that the public users of the EBA Register should be able to check information at any given date in the past 13 months.	The EBA is of the view that this information can be extracted from the EBA Register by checking the dates of authorisation and registration of the undertakings, which will be made publicly available. This information will also be made available about undertakings whose authorisations or registrations have been withdrawn.	See the amendments made in issue 49.
			However, it should be noted that dates of registration and deregistration of agents will not be included in the EBA Register. That would also not have much added value,	



No	Comments	Summary of responses received	EBA analysis	Amendments to the proposal
			because, according to Article 20(2) of PSD2, payment institutions are fully liable for the acts of their agents related to the provision of payment services on their behalf.	
			It should also be noted that the technological solution chosen for the EBA Register will not allow searching of historical data.	
Feed	lback on resp	oonses to question 3		
64	Chapter 3 of the RTS	Several respondents were of the view that the non-functional requirements should be provided in greater detail. Two respondents suggested that the EBA should add more detail about the response time. They were of the view that the response time of the EBA Register should be synchronised with the values already existing for e-banking channels. One respondent suggested that the requirements for the audit and management of the information in the EBA Register should be more comprehensive.	The EBA is of the view that the non-functional requirements, including response time, audit and management requirements, provide the respective requirements at a high level of generality, which was the overall approach taken by the EBA in the process of development of the two technical standards. The EBA is of the view that these high-level requirements should be sufficient to ensure that the EBA Register is safe, secure, properly maintained and available to public users to search it 24/7 with the same level of performance, and that information is properly recorded.	None.
65	Chapter 3 of the RTS	A number of respondents recommended that the EBA should include in the RTS a provision related to the review of the non-functional requirements of the EBA Register on regular basis due to the rapidly developing and changing lands cape. The various respondents suggested different time frames, such as 6, 12 and 18 months.		The EBA introduced a new paragraph in Article 14 of the RTS: Article 14(3) The EBA shall review the suitability of the non-functional requirements specified in this



No	Comments	Summary of responses received	EBA analysis	Amendments to the proposal
				Chapter on a regular basis.
66	Article 15 of the RTS	A number of respondents suggested that the EBA should explicitly state that the EBA Register will be available 24/7. Some of these respondents were of the view that it should be further specified that the level of availability should be 99.88% during prime time and 98.5% during non-prime time.	See the analysis of issues 64 and 65. In addition, it should be noted that the EBA will strive to reach availability of the register at around the levels suggested by the respondents.	None.
		Some of these respondents considered that, if the above levels of availability are not reached, there would be a risk that the register might become useless for industry stakeholders.		
		Moreover, one of the respondents suggested that the above levels of availability would give certainty to market participants that the EBA Register meets its objectives.		
67	Article 15 of the RTS	One respondent suggested that the RTS should introduce a technological solution which should not affect the availability of the EBA Register and its	The EBA agrees with the respondent and has decided to further darify in Article 13 of the RTS that automated transmission of information should not affect the availability of the EBA Register.	The EBA introduced a new paragraph in Article 13 of the RTS:
		content in the process of transmission of information from CAs.		Article 13(5) The automated transmission of information specified in Article 8 shall not affect the availability of the electronic central register of the EBA.



No	Comments	Summary of responses received	EBA analysis	Amendments to the proposal
68	Article 6 of the RTS	A few respondents suggested that the RTS should provide more detail on how the EBA would manage the security of the internal users.	The EBA has already provided in Article 4(1) of the RTS that manual access to the EBA Register will use two-factor authentication, which should ensure that the members of the staff of CAs will be able to safely log in to the application of the register and insert or a mend information in it.	None.
			It should also be noted that Artide 3 and Artide 4(2) of the RTS provide that the EBA will provide the authentication details (use mame, password and other security credentials) to the members of the staff of CAs that are responsible for manual insertion or modification of information in the EBA Register, which is another way in which the EBA can ensure that the security a spect is properly managed.	
			However, it should be taken into account that CAs will have discretion to decide the members of their staff who will be responsible for inserting or modifying information in the EBA Register and to monitor the actions performed by these staff members.	
69	Article 16 of the RTS	One respondent was of the view that the EBA should define how operational issues could be reported.	The EBA has already introduced in Artide 14(2) of the RTS that it shall provide support to CAs related to the operation of the register by introducing functionality for CAs to submit a query.	None.
70	General comment and Article 15 of the RTS	One respondent was of the view that the EBA should be responsible for the confidentiality, integrity and a vailability of the information in the EBA Register.	With regard to the suggestion that the EBA should be responsible for the confidentiality of the information contained in the EBA Register, it should be noted that the whole content of the EBA Register will be public information, so the EBA does not find merit in introducing such a requirement.	None.
			In relation to the suggestion that EBA should be responsible for the integrity of the information, the EBA is of the view that there is no need to specify it in the RTS because:	
			According to Article 15(3) of PSD2, it is the responsibility of the competent authorities of the Member States, not the EBA, that the information submitted to, and contained in, the EBA Register is accurate (which should ensure the integrity of the information until the moment of receipt of this information by the EBA);	
			Article 15(1) of PSD2 requires the EBA to be responsible for the accurate presentation of the information contained in the EBA Register (which should ensure the integrity of the information between the moment of receipt of this information from the EBA and its publication);	
			The envisaged channels for provision of information from CAs to the EBA aim to ensure that the integrity of the transmitted information remains unaltered.	



No	Comments	Summary of responses received	EBA analysis	Amendments to the proposal
71	Article 14 of the RTS	One respondent was of the view that the RTS should allow roll-backs of data in the event of any failure of the system of the EBA Register or if issues are encountered.	The EBA agrees with the respondent that the EBA should ensure that the content of the EBA Register is publicly available after any failure of the application of the register. Therefore, the EBA has amended Article 15(3) of the RTS that was part of the CP accordingly.	The EBA introduced two new paragraphs in Article 12 of the RTS:
				(5) The EBA shall notify competent authorities about any failure or downtime of the application of the electronic central register.
				(6) If a failure of the application of the electronic central register of the EBA has affected the processing of a batch file transmitted by a competent authority, the competent authority shall submit a new batch
				file. If the competent authority is unable to do so, it shall request from the EBA to roll-back the data to the version that was submitted with the last



No	Comments	Summary of responses received	EBA analysis	Amendments to the proposal
				validated batch file prior to the failure.
				The EBA introduced three new paragraphs in Article 13 of the RTS:
				Article 13(4) The EBA shall ensure that the electronic central register is available after any failure of the application of the register.
				(6) The EBA shall notify public users of any unavailability of the electronic central register and provide them with information on the reasons for the unavailability and the recovery of the register.
				(7) The EBA shall display the information specified in paragraph (6) on its website.
72	Article 15 of	One respondent suggested that, in	As explained in paragraphs 26 to 28 of the Rationale of the CP, the EBA considered	None.



No	Comments	Summary of responses received	EBA analysis	Amendments to the proposal
	the RTS	order to properly size the EBA Register's non-functional requirements and build a resilient system, a valid and realistic quantity structure of the usage needs should be defined (expected download numbers and modification requests).	introducing indicative numbers of the separate entries that are expected to be uploaded by CAs in the EBA Register when it starts operating, and the expected increase in the volume of this information over time. The EBA took into account that the number of the natural or legal persons entered in the national registers might change over time while the EBA is developing the two technical standards and the EBA Register itself. In relation to the changes in the volume of the data in the EBA Register, the EBA received information from the CAs about the number of the natural or legal persons made publidy available in the national registers, which at that time was around 150 000, and the various changes in the total number of these persons in 2014-2016. The highest increase observed between two consecutive years was around 25% or 20 000 persons at that time. Nonetheless, the EBA observed that the changes between the years vary significantly and, therefore, a common indicative trend cannot be established.	
73	Article 14 of the RTS	One respondent suggested that, in order to follow good security practices, the data in the EBA Register should also be protected from unauthorised manipulations performed by third parties.	Any manipulation performed by unauthorised parties will be blocked. The possibility of modifying the information contained in the system will be guaranteed only to authorised users, as described in Articles 2 and 8 of the RTS. If any security issues are detected, the EBA shall be able to shut down the application of the electronic central register of the EBA and prevent any access to the server immediately, as described in Article 12 of the RTS. Furthermore, the automated transmission of information and the end-points should be appropriated in line with Article 12 of the RTS.	None.
			encrypted in line with Article 8(2) of the RTS. Finally, it should be noted that, according to Artide 5(3) of the RTS, all public users will be able only to read, search and download the information contained in the EBA Register.	
74	Article 14 of the RTS	One respondent was of the view that the EBA Register should be designed from a security perspective to prevent malicious corruption of the data held in	The EBA agrees with the view of the respondent that the EBA Register should be designed from a cyber security perspective, including malicious corruption of the data, and has, therefore, amended the RTS accordingly.	The EBA introduced a new paragraph in Article 12 of the RTS:
		the register.		Article 12(7) The EBA shall develop its register in accordance with the international standards for cyber security.



No	Comments	Summary of responses received	EBA analysis	Amendments to the proposal
75	Article 14 of the RTS	A respondent suggested that the EBA should formalise the Recovery Point Objective (RPO) and Recovery Time Objective (RTO) of the platform of the EBA Register.	The EBA is of the view that the suggestion is too technical and is not in line with the approach taken by the EBA of developing high-level technological requirements for the EBA Register. The EBA decided not to incorporate it because it depends on various issues that might arise and the architecture of the system of the EBA Register, both of which could be identified separately during the process of development of the EBA Register. However, it should be taken into account that the EBA complies with the EU information security requirements.	None.
76	Article 15 of the RTS	One respondent suggested that the system of the EBA Register should be scalable in terms of capacity and performance.	As described in Article 13(2) of RTS, the EBA Register shall be able to accommodate an increase in the volume of the information received by competent authorities. However, the EBA has introduced an additional sentence to the paragraph specifying that the increase in the volume of the information received from CAs should not reflect the performance of the register.	The EBA introduced a new sentence at the end of Article 13(2) of the RTS: Article 13(2) The application of the electronic central register of the EBA shall be able to accommodate increase in the volume of the information received by from competent authorities. This increase shall not affect the availability of the register.
77	Article 15 of the RTS	Several respondents suggested that the maximum time span between the changes in the NPRs and the provision of the information to the EBA should	Article 15(2) of PSD2 requires CAs to notify the EBA of the information entered in their respective NPRs without delay. Therefore, the EBA cannot further specify this timeframe in the RTS. It should also be noted that the time span between the publication of new changes in the	None.



No	Comments	Summary of responses received	EBA analysis	Amendments to the proposal
		be further specified.	NPRs and their publication in the EBA Register will also be affected by the number of batch files transmitted, the duration of the validation procedure and the duration of the process of updating the information in the EBA Register immediately after successful validation.	
			Finally, it should be taken into account that the public users of the EBA Register will be aware at any moment of the validity of the information contained in the register because of the date and time stamps that will be a vailable.	
78	Articles 10 and 15 of the RTS	One respondent was of the view that the RTS should dearly describe the responsibilities of CAs with regard to assuring authenticity and integrity of data in the process of provision of information to the EBA.	According to Artide 15(3) of PSD2, it is the responsibility of the competent authorities of the Member States, not the EBA, that the information submitted to, and contained in, the EBA Register is accurate. Moreover, CAs will transmit automatically to the EBA a mirrored copy of the content of their NPRs, which should ensure authenticity and integrity of that information. However, the EBA has decided that it could address the comment made by the respondent only by introducing additional requirements of the encryption during the transmission of information.	The EBA a mended and reworded Article 8(2) of the RTS: Article 8(2) The EBA and the competent authorities shall ensure secure transmission of information between the applications of their respective registers in order to safeguard the authenticity, integrity and nonrepudiation of the information transmitted, using strong and widely recognised encryption techniques.
79	Article 16 of the RTS	One respondent suggested that the RTS should specify more precisely the time frame for responding to any	The EBA is of the view that the proposed draft of Article 16(2) of the RTS (included in the CP) should not be changed.	The EBA a mended Article 14(5) of the RTS in the following



No	Comments	Summary of responses received	EBA analysis	Amendments to the proposal
		queri es from CAs.	The response from the EBA to each query received from a CA would depend on various factors such as the number of queries received, the availability of the relevant EBA staff and the time when the query was submitted to the EBA. However, the EBA has decided to further specify that it will respond to the queries in order of reception and applying the principle of 'first in, first served'.	way: Article 14(5) EBA shall respond to the queries referred to in paragraph (4) without undue delay by the end of the day within the working hours of the EBA business days. The EBA shall respond to the queries in order of reception.
80	Article 14 of the RTS	One respondent suggested that the EBA should put in place communication mechanisms to notify CAs in the event of a shutdown of the EBA Register for security reasons.	The procedure related to the shutdown of the application of the EBA Register is specified in Article 12(2) of the RTS. However, the EBA has decided to introduce a requirement for the EBA to notify CAs in the event of a shutdown of the EBA Register.	A new paragraph was introduced to Article 12 of the RTS: Article 12(5) The EBA shall notify competent authorities about any failure or downtime of the application of the electronic central register.
81	Articles 10 and 15 of the RTS	One respondent suggested that the security encryption used in the process of automated transmission of information should also safeguard the integrity of the data.	The EBA agrees with the view of the respondent. See also the analysis of issue 78.	See the amendments made in issue 78.
82	Article 17 of	One respondent suggested that the	Article 15(1) of the RTS provides that the EBA Register shall allow recording of all the	None.



No	Comments	Summary of responses received	EBA analysis	Amendments to the proposal
	the RTS	single batch file originally sent by a CA has been properly uploaded. Artic of al	information transmitted by competent a uthorities to the EBA.	
			Article 15(2) of the RTS continues by providing that the EBA Register shall allow recording of all automated or manual actions performed by the applications of the national public registers or by the internal users respectively.	
			The EBA is of the view that the above requirements would allow the EBA to prove that the single batch file originally sent by a CA has been properly uploaded.	
			Furthermore, Artide 15(1) of PSD2 requires the EBA to be responsible for the accurate presentation of the information contained in the EBA Register. Therefore, in order to meet that requirement, the EBA should properly upload the automatically transmitted batch files without manual intervention.	
		oonses to question 4		
83	Article 3 of the ITS	A large number of respondents suggested that ASPSPs and credit institutions providing AIS and PIS should also be induded in the EBA Register. The respondents were of the view that, by doing so, the EBA would: - ensure a high level of consumer protection; - contribute to an efficient market for payment services in the EU; - provide a single list of all PSPs, which will, therefore, be treated equally, and reduce the negative effect on cross-border provision of services;	Credit institutions are not in the scope of the mandate under Artide 15(5) of PSD2 and, therefore, the EBA is legally not able to include credit institutions in the EBA Register. Artide 14 of PSD2 specifies the natural and legal persons that should be included in the NPRs and communicated to the EBA accordingly. Artides 37(5) and 111(1) of PSD2 also introduce additional persons that should be included in the NPRs. These articles of PSD2 do not cover credit institutions. The majority of CAs would not include information on credit institution on their NPRs under PSD2 because they maintains eparate registers for authorised credit institutions. Furthermore, the EBA has developed and operates a separate centralised register for authorised credit institutions: the EBA Credit Institutions Register. Finally, the EBA would like to highlight that all authorised credit institutions are entitled to provide the whole range of payments ervices.	None.



No	Comments	Summary of responses received	EBA analysis	Amendments to the proposal
		TPPs; - support the verification process of ASPSPs under Articles 65, 66 and 67 of PSD2 and the RTS on Strong Customer Authentication and Common and Secure Communication.		
84	General comment	Some respondents suggested that the EBA should merge the EBA Register under PSD2 and the EBA Credit Institutions Register.	The two registers cannot be merged because of the difference in the legal basis for the establishment and operation of the registers, the difference in the functionalities and the information that should be contained on them, the sources of information and the technological solutions for provision of information.	None.
85	Articles 3 and 9 of the ITS	One respondent suggested that, based on Artide 33 of PSD2, the EBA should include in the EBA Register only agents of AISPs that provide services in a Member State other than their home Member State.	The EBA would like to highlight that Artide 14(1)(b) of PSD2 provides that the NPRs under PSD2 should contain information on AISPs 'and their agents' without making any distinction between agents in the home or host Member State. From a practical perspective, the EBA does not exclude the possibility that some AISPs could provide a count information services in their home Member State through agents, depending on their business model.	None.
Feed	lback on resp	onses to question 5		
86	General comment and Annex of the ITS	The majority of the respondents suggested having more detailed information contained in the EBA Register in order for it to become comprehensive information tool. Some of them suggested that, by doing so, the EBA would smooth the functioning of the new payment services under PSD2.	The EBA Register will cover information that is made publicly available by all or the majority of the CAs in their NPRs. By doing so, the EBA will ensure that the information contained in the EBA Register is consistent and accurate, and ensures the same level of transparency and a level playing field for all payment and electronic money institutions in the EU. If the public users of the EBA Register require additional information, they can always refer to the NPR of the respective CA. In order to facilitate this process, the EBA will introduce in the EBA Register hyperlinks to all NPRs of the CAs.	The EBA introduced a new paragraph in Article 6 of the RTS: Article 6(4) Competent authorities shall provide to the EBA a hyperlink to their national public register. EBA shall make these hyperlinks publicly



No	Comments	Summary of responses received	EBA analysis	Amendments to the proposal
				available in the electronic central register.
87	Annex of the ITS – identifiers	A few respondents suggested that the EBA should incorporate in the EBA Register both legal identifiers and national registry codes.	The ITS already cover the national identification numbers for all undertakings, which could be either the legal identifier or the national registry code of the undertaking. The EBA is of the view that CAs should have discretion to decide the identification number that they will make publicly a vailable. The EBA would also like to note that the purpose of the identification number used in the EBA Register is for public users to be able to identify the undertaking in the NPR of the respective CA. Moreover, in most cases, the national registry code will be identical to the legal identifier, which would result in inconsistently populated content of the EBA Register.	None.
88	Annex of the ITS – identifiers	A few respondents were of the view that the EBA should assign group identification numbers to PSPs and their subsidiaries; these numbers should be common to all subsidiaries of the same PSP.	The EBA does not agree with the respondents because PSD2 does not provide for such data to be included in the EBA Register. Moreover, while conducting the fact-finding exercise at the beginning of the work on the development of the CP, the EBA was not made aware of many undertakings that have subsidiaries.	None.
89	Annex of the ITS — a uthorisation or registration status	A few respondents suggested that the information in the EBA Register should cover the validity or the expiration date of the licence of the PSP to minimise fraud risk and to help PSPs validate each other, especially on a cross-border basis within the EU.	The EBA is of the view that the validity of the licence could always be checked in the EBA Register. If the undertaking is authorised or registered, it will be contained in the register. If the authorisation or the registration has been withdrawn, this information will also be made publicly available. In addition, PSD2 does not provide for validity or expiration dates of authorisations or registrations.	The EBA included in the respective tables in the Annex of the ITS the dates of authorisation or registration or dates of withdrawal of authorisation or registration for payment and electronic money institutions, account information service providers and the



No	Comments	Summary of responses received	EBA analysis	Amendments to the proposal
				exempted payment and electronic money institutions.
90	Tables 1, 3 and 4 of the Annex of the ITS	A few respondents suggested that the EBA should include in the EBA Register information about the qualified certificate issued by qualified trust service providers (QTSPs), including the issuing and validity date, the IP address and the name of the QTSP. In their view, this would minimise the risk of fraud risk and help PSPs validate each other, especially on a cross-border basis within the EU.	The certificates issued by QTSPs can be checked by ASPSPs directly with the QTSPs. CAs do not have to include information on these certificates in their NPRs and, therefore, the EBA has no mandate to require CAs to do so. Moreover, CAs might not possess information on qualified certificates for electronic seals because there is not explicit requirement of PSD2 obliging them to do so. It should also be noted that competent supervisory bodies under Regulation (EU) 910/2014 on electronic identification and trust services for electronic transactions in the internal market might be different from the competent authorities under PSD2. The EBA also arrived at the view that the information about qualified certificates should not be included in the EBA Register because it is not directly linked to the objectives of PSD2 for the EBA Register as provided in recital 42 of PSD2. Furthermore, there is no legal requirement that obliges CAs to provide this information to	None.
91	Annex of the ITS – identifiers	A few respondents suggested that the EBA should harmonise the national identifier by obliging CAs to use the legal entity identifier. These respondents acknowledge that legal entity identifiers cannot be assigned to natural persons, but they maintain that an alternative code could be generated for that purpose. In their view, this would facilitate the updating of information in the EBA Register because part of the information required under the ITS is available as part of the core set of data elements that are common to all providers which possesslegal entity identifiers.	the EBA. The ITS introduce national identification numbers for all undertakings, which could also be legal entity identifiers. However, there are no legal requirements obliging CAs to request that the payment or electronic money institutions authorised by or registered with them use legal entity identifiers. The EBA is of the view that CAs should have discretion to decide the identification number that they will make publicly available. This identifier shall allow the public users of the EBA Register to find the undertaking in the respective NPR. Moreover, as suggested by the respondents themselves, legal entity identifiers cannot be appointed to natural persons. This will reduce the usefulness of the identifier because the majority of the entries in the EBA Register would be agents, which might be natural persons.	None.



l ⁻	Annex of the ITS – commercial na me	Several respondents were of the view that the EBA should include commercial/brand/trade names in the EBA Register. These respondents suggested that this would contribute to the objectives of PSD2 of enhancing transparency and ensuring a high level of consumer protection.	The EBA agrees with the view of the respondents because many consumers might know and be able to identify a certain payment or electronic money institution only by its commercial name. Therefore, the EBA has introduced it in the Annex of the ITS for payment and electronic money institutions. However, it should be noted that this information is not consistently collected by CAs or made publicly available on their NPRS. Also, not all payment or electronic money institutions use commercial names or have notified the CAs that has authorised or registered them of the commercial names that they use. Therefore, the EBA arrived at the view that the commercial name should be provided by	The EBA included in the respective tables in the Annex of the ITS the commercial names of payment and electronic money institutions, account information service
			CAs, but only on an optional basis, because neither CAs nor the EBA would be able to ensure that this information is consistently collected and made publidy available by all CAs.	providers and the exempted payment and electronic money institutions.
	General comment	One respondent suggested that users of the EBA Register should be able to suggest additional information that should be entered in the EBA Register.	The EBA does not agree with the respondent. The information contained in the EBA Register is either required by PSD2 itself or made publidy a vailable by the majority of the CAs. The information that will be included in the EBA Register is specified under the ITS.	None.
•	General comment	One respondent suggested that passporting information should be included in the EBA Register.	The EBA would like to point out that the EBA Register will include information which is used for passporting purposes, such as host Member State where the institution could provide services and the respective payment and electronic money services provided by the undertaking or its branch in these territories, as well as the addresses of the branches in these host Member States, if applicable. See also the analysis of issue 99.	None.
	General comment	A few respondents suggested that all the information contained in the EBA Register should be legally binding for CAs to provide.	The information covered by the ITS will be mandatory for all CAs to provide to the EBA with the exception of the commercial name of the undertaking. See also issue 92.	None.
l'	Annex of the ITS – legal form	One respondent suggested that the legal form of the undertaking should be provided in the EBA Register.	The legal form of the undertaking is incorporated in its name. Therefore, there is no need for explicit reference to this type of information in the ITS.	None.



No	Comments	Summary of responses received	EBA analysis	Amendments to the proposal
97	Annex of the ITS – contact details	A large number of respondents suggested that the EBA Register should include the contact details of payment and electronic money institutions and their branches, such as telephone number, email address and website. These respondents consider that information on the contact details will facilitate the procedure in cases of resolution of disputes, technical problems and complaints-handling, as well as the identification of fraud. It will also increase transparency and confidence in the payments market.	The contact details of payment and electronic money institutions and their branches are neither explicitly required by PSD2 nor made publicly available by the majority of the CAs at the moment. Also, even if contact details are communicated to CAs by the respective institutions, CAs are not regularly updated on the changes to this information and, therefore, cannot ensure that it is up to date and accurate. Moreover, if CAs are to keep the information on the contact details up to date, it will result in an excessive administrative burden on them. Also, some of the information could be considered confidential in some Member States, especially if it concerns natural persons providing payment services. Public users of the EBA Register can always refer to the NPRs. In order to facilitate this process, the EBA will introduce in the EBA Register links to all NPRs of the CAs — please see the analysis of issue 86.	See the a mendments introduced in is sue 86.
98	Annex of the ITS – identifiers	A few respondents suggested that the EBA Register should contain the national identifiers of payment and electronic money institutions in the host Member State.	There are divergent practices across Member States in their practices of assigning national identification numbers to the undertakings providing services in their jurisdiction. Therefore, in order to ensure consistency of the information contained in the EBA Register and not to confuse the public users, the EBA decided not to include in its register any identifiers assigned to undertakings in the host Member State.	None.
99	Annex of the ITS – services in host Member States	A large number of respondents were of the view that the payment services provided in the host Member State should be induded in the register. In their view, this would allow payment service users and ASPSPs to verify the type of authorisation granted to a TPP (to determine whether or not a natural or legal person may conduct a particular service within a particular Member State). If the services provided in host Member States are not introduced, PSPs will need to access all CA registers or use third party providers and hence	The EBA considered that making information on the payment services provided in the host Member States publicly available in the EBA Register is essential for fulfilling the objective of PSD2 related to the EBA Register to facilitate the cooperation between home and host CAs. The EBA is of the view that, by doing so, it will reduce the mismatch between the information provided by home CAs through the passport notification procedure to the host Member State and the information included in the NPR of the respective home CA; and will allow host CAs to be always aware of the services that are being provided in their territory by payment and electronic money institutions authorised in another Member State. Furthermore, in order to increase the transparency of the operations of payment and electronic money institutions and to ensure a high level of consumer protection by making the public users of the EBA Register aware of the payment services that are provided in the host Member State, the EBA has decided to include in the EBA Register the payment and electronic money services provided in the host Member State via the	The EBA included in Tables 1 and 4 of the Annex of the ITS the payment and electronic money services provided in the host Member State via the freedom to provide services and/or a branch.



No	Comments	Summary of responses received	EBA analysis	Amendments to the proposal
		the added value of a central register for PSPs and the services they provide will be limited.	freedom to provide services and/or a branch. The EBA took into a count that all CAs possess this information and are obliged to keep it up to date under PSD2, and that most of them would be able to make it publicly a vailable on their NPRs.	
100	Annex of the ITS – host Member States	One respondent suggested including in the EBA Register the country where the PSP can offer services.	The information about the host Member State where payment and electronic money institutions provide services is already covered by the Annex of the ITS.	None.
101	Tables 1, 3 and 4 of the Annex of the ITS	A few respondents suggested that branches should be included in the EBA Register as separate entities.	Branches cannot be separate legal entities because they are part of the structure of payment or electronic money institutions. Therefore, the EBA has decided to introduce information about branches as part of the information contained about the respective institution.	None.
102	Annex of the ITS – dates of authorisation or registration	A number of respondents suggested that the EBA Register should contain dates of authorisation/registration. In their view, this will prevent uncertainty about the status of a PSP at any given time, increase transparency and have a positive effect on consumers' confidence in the payment services provided by PSPs.	The EBA agrees that market participants would benefit from knowing the exact date from which the undertaking is allowed to provide payment services or the date from which it ceased to provide payment services. The EBA considered that, by making this change, the EBA will reduce uncertainty about the status of payment and electronic money institutions at any given time, allow PSPs to better assess complaints of payment service users, and have a positive effect on consumers' confidence in the services provided by these institutions. The EBA also took into account that the majority of the CAs make this information publicly available and that it would be a one-off requirement for CAs, which should keep the administrative burden on them to a minimum. With regard to the above, the EBA has decided to include the dates of authorisation or registration of the undertakings, as well as the dates of withdrawal of authorisation or registration. It should be noted that the majority of the CAs do not make publicly available the dates of authorisation, registration or revocation of the various payment services and the EBA has not, therefore, included them in the ITS. The EBA Register would list all the payment services that the undertakings can provide at the moment of the search. However, it should also be noted that the EBA Register would contain information about the status of all the undertakings listed on it: authorised, registered and revoked.	See the amendments introduced in issue 89.



No	Commonts	Summary of responses received	EBA analysis	Amendments to		
No	Comments	Summary of responses received	EBA analysis	the proposal		
103	General comment	One respondent suggested including agents and branches established in host Member States.	Agents and branches of payment or electronic money institutions operating in a host Member State are covered by the ITS and will be included in the EBA Register accordingly.	None.		
Feed	lback on resp	onses to question 7				
104	Article 11 and Table 8 of the Annex of the ITS	While the majority of the respondents agreed with the extension of the information about the service providers excluded from the scope of PSD2 that will be entered in the EBA Register, one respondent suggested that the EBA is legally not able to add information requirement for these service providers because they are not authorised or supervised by CAs.	service providers should be easily identified in the EBA Register and the description of their activities should be harmonised. By doing that, the EBA will also fulfil some of the objectives of PSD2 for the EBA Register, and in particular the objectives of bringing transparency to the payment service market in the EU and ensuring high-level consumer protection.	None.		
Feed	Feedback on responses to question 8					
105	Table 6 of the Annex of the ITS	While the majority of the respondents supported the proposed information to be contained in the EBA Register for agents, some of the respondents were of the view that the EBA Register should include a list of the payment services provided through agents because there are instances where agents do not provide the whole set of payment services for which the respective undertaking is authorised or registered. A few respondents suggested that, in their view, this would also reduce the	As most CAs do not make the information on the payment services provided by agents publicly available on their NPRs, the EBA cannot do so either. It should be noted that the EBA will include in its register information that the majority of the CAs collect and publish. Some CAs consider that making information on the payment services provided through agents publicly available would be too big an administrative burden on them. Furthermore, Article 20(2) of PSD2 requires payment institutions to remain fully liable for the acts of their agents related to the provision of payment services on their behalf. Furthermore, in most cases, agents provide the whole set of payment services for which the respective PSP is a uthorised or registered. From a practical perspective, payment service users and other interested parties could rely on the services for which the institution on behalf of which the agent provides services has been authorised or registered, which will be listed in the EBA Register.	None.		



No	Comments	Summary of responses received	EBA analysis	Amendments to the proposal
		risk of fraud.		
106	Table 6 of the Annex of the ITS	A few respondents suggested that the contact details of agents, such as email address, telephone number and website, should be included in the EBA Register.	, ,	See the amendments introduced in is sue 86.
107	Table 6 of the Annex of the ITS	A few respondents suggested that the dates of registration of agents in the NPRs should be included in the EBA Register.	As most CAs do not make the dates of registration of agents publidy available on their NPRs, the EBA cannot do so either. It should be noted that the EBA will indude in its register information that the majority of the CAs collect and publish. Moreover, induding information on the dates of registration of agents in the NPRs would impose an additional administrative burden on CAs.	See the amendments introduced in issue 86.
			Public users of the EBA Register can always refer to the NPRs. In order to facilitate this process, the EBA will introduce in the EBA Register links to all NPRs of the CAs – see the analysis of issue 86.	