



Study on new developments in card-based payment markets, including as regards relevant aspects of the application of the Interchange Fee Regulation

Annexes 1-6

Prepared by



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card-based payment markets,
including as regards
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Interchange Fee Regulation**

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Annex 1 Interview guides

1. Interview guide retailer associations

Please note that these guides list the **topics** we will cover with the different associations.

The interviews are different in nature from the survey. The interviews will be semi-structured and based on the knowledge of the interviewee. We do not expect the associations to directly hold or provide us with detailed quantitative data.

The aim is to raise awareness of the study (in view of the consultation of their members), collect background information and position papers and open a channel of communication with the key stakeholder groups that we can use to go back and fill data gaps or clarify specific points.

As a result, the questions here are broader “conversation starters” that will allow us to delve more deeply into specific topics.

Introduction

Please indicate which countries your association represents?

Evolution of the payment market

Overall payment market

1. Who are the main players in the payment market in your country? What is the degree of competition between these players and how has this evolved over the last 4 years?
2. In your view, what have been the key changes in payment behaviour in the last 4 years (e.g. new payment types, e-commerce, new value proposition in payments; new customer journey in payments. Please explain.

Acquiring market

3. Over the last 4 years have you seen a change in the **structure of the acquiring market** (e.g. entry of new players (big tech, fintech, new banks, cross-border acquirers)? Please explain.
4. In your view, how have **entry / exit** of acquirers affected the market (new competitors, merger and acquisition,...)? Please explain.
5. Have you seen a change in the importance of **cross-border** acquiring in the market? Does your answer differ between off and online transactions? Please explain.

Evolution of card fees

6. How have **merchant service charges** evolved by type of card (credit, debit, commercial) since 1 January 2018? Are there differences between different card schemes / acquirers / Member States? Please explain.
7. How have **total card scheme fees and processing fees** faced by merchants evolved by type of card (credit, debit, commercial) since 1 January 2018? Are there differences between different card schemes / acquirers / Member States? Please explain.
8. In your view, are these changes in merchant service charges a result of **changes in interchange fees, processing fees, card scheme fees or other fees**? Are

there differences between different card schemes / acquirers / Member States? Please explain.

9. Are you aware of any **new fees** introduced since 1 January 2018 by type of card (credit, debit, commercial)? Are these new fees related to acquiring, processing or to the card scheme? How have these new fees been explained and justified? (e.g. to compensate for new services; to compensate increase in schemes fees, etc..)

Blended and unblended fee schedules

10. What is the **prevalence of blended and unblended fee schedules** (e.g. IF++ contracts) among merchants? Could you specify the main reasons behind this?
Prompt (if needed): lack of administrative capacity, lack of interest, technical obstacles, lack of information or offering by acquirers
11. Considering merchants using unblended fee schedules (e.g. IF++ contracts), what is the **quality of information** provided to those merchants by acquiring companies to distinguish between fee elements (i.e., scheme fees, interchange fees, processing fees and acquiring fees)?
12. In your opinion, what are the **main obstacles** for merchants in switching acquirers?
Prompt (if needed): 'lack of transparency in pricing of acquiring services, contractual terms for acquiring contracts/indefinite duration of such contracts, possible lack of portability of POS terminals and/or early termination fees for POS terminal contracts', other?

Choice of application at point of sale

The following questions are related to payments with co-badged payment instruments, according to the IFR (2015) defined as: the inclusion of two or more payment brands or payment applications of the same brand on the same card-based payment instrument. Examples: a plastic or virtual card (e.g. in a wallet) with the brand of a domestic and an international brand or with two payment categories (debit & credit), not necessarily of the same brand. In some wallets the virtual equivalent of a co-badged card is loaded instead of two separate brands (or categories), visible to the wallet user, which are linked to the same card.

13. To your knowledge, to what extent do merchants have in place **priority selection** at the point of sale, favouring a particular payment application? If they have no priority selection in place, explain why.

Prompt (if needed): not all wallets/applications are able to make use of NFC/QR/BLE, only one payment application/AID is presented/sent to the terminal, lack of update of terminals, current terminals not supporting choice, retailers are unable to identify brand and/or category of cards, other?
14. To your knowledge, when using a merchant's card reader (or payment interface in the case of e-commerce) are consumers (when using a co-badged plastic card or a virtual co-badged card in a digital wallet or in a wearable device) effectively **able to choose** which payment brand/category they wish to use when making a purchase?
15. Overall, in your view, are consumers effectively able to choose their preferred payment application at the point of sale? What is the frequency of such choice (i.e. the prevalence of overrides of the merchant's priority choice)?
16. How is this choice generally presented to customers (e.g. do they have to select an option on the payment terminal screen? Does the option appear automatically, or

does the consumer have to press a button before inserting or tapping their card/mobile? Do merchants notify customers of their possibilities orally? Other?)

17. To your knowledge, **are consumers aware** of the possibility to choose their preferred payment application at the POS terminal?
18. In your experience, what are the main **obstacles** that limit effective implementation of the choice of the customer (e.g. when using a co-badged plastic card or a co-badged virtual card in a digital wallet or in a wearable device)?
Prompt (if needed): legal / technical obstacles? Lack of awareness? Limited transparency about how to make a choice? Lack of merchant follow-through? Lack of incentives, including rebates? Cost of terminal updates?
19. Are you aware of **technical obstacles limiting choice**, including not all wallets/applications being enabled to use NFC/QR/BLE, co-badged cards uploaded as two mono-branded cards and only one Application Identifier (AID) is sent to the POI (in case of a virtual co-badged card, both AIDs are sent?), one token is prioritised e.g. at tokenisation or consumers are obliged to choose a preferred payment application/token at enrolment?
20. In your view, do **smaller merchants** face greater difficulties in offering choice of payment application to consumers? Why?

Closing questions

21. Are you aware of any documents, reports, and position papers we should review in the context of this study?
22. Have you published any studies on the impact of the Regulation on merchants? Have you dealt with merchant / consumer complaints?
23. Would you be able to provide contact details of stakeholders that we should contact for the study? Would you also be able to circulate our list of questions with your members?

2. Interview guide consumer associations

Introduction

Please indicate which countries your association represents?

Interchange fee regulation and the evolution of the payment market

1. In your view, what have been the key changes in **payment behaviour** in the last 4 years (e.g. new payment types, e-commerce, new value proposition in payments; new customer journey etc). Please explain.
2. In your view, how has **card acceptance** changed on the part of merchants since 1 January 2018?
3. To your knowledge, has **acceptance of other means of card-payment** (such as mobile wallets, and contactless) increased since 1 January 2018?

Co-badging and choice of application at point of sale

4. Can consumers upload a co-badged card or a card-based payment application of their choice in their mobile wallets, smartphones or wearables (provided they are technically compatible with the device)? If not, quantify the magnitude of the issue if possible, and explain the difficulties they are facing/the reasons why? If you cannot quantify, do you have examples of complaints from consumers highlighting such difficulties?

Prompt (if needed): technical obstacles are making co-badging difficult, including co-badged cards being uploaded as two mono-branded cards/ only one token can

be uploaded on a wallet/ only one token fully authenticated, and as a consequence prioritised?

5. To your knowledge, when using a merchant's card reader (or payment interface in the case of e-commerce) are consumers (when using a co-badged card, digital wallet, or wearable device) effectively **able to choose** which payment brand/category they wish when making a purchase? Are consumers able to override any preferred option (priority selection) of merchants?
6. To your knowledge, **are consumers aware** of the possibility to choose their preferred payment application at the POS terminal?
7. In your experience, what are the main **obstacles** that limit effective implementation of the choice of the customer (e.g. when using a co-badged card, digital wallet, or wearable device)? Do you have examples of complaints from consumers highlighting difficulties in making choices?

Prompt (if needed): legal / technical obstacles? Lack of awareness? Limited transparency about how to make a choice? Lack of merchant follow-through? Lack of incentives, including rebates? Cost of terminal updates?

8. *Are you aware of technical obstacles limiting choice*, including not all wallets/applications being enabled to use NFC/QR/BLE, co-badged cards uploaded as two mono-branded cards and only one Application Identifier (AID) is sent to the POI (in case of a virtual co-badged card, both AIDs are sent?), one token is prioritised e.g. at tokenisation or consumers are obliged to choose a preferred payment application/token at enrolment?

Closing questions

9. Are you aware of any documents, reports, and position papers we should review in the context of this study?
10. Have you published any studies on the impact of the Interchange Fee Regulation on consumers? Have you dealt with consumer complaints?

3. Payment industry associations

Introduction

Please indicate which countries your association represents?

Please specify the type of organisations you represent (e.g., card schemes, issuers, acquirers, processors, or any other type of providers)

Evolution of the payment market

1. In your view, what have been the key changes in **payment behaviour** in the last 4 years (e.g. new payment types, e-commerce, new value proposition in payments; new customer journey, etc). Please explain.
2. Who are the **main players providing issuing, acquiring and processing services** in your country / in Europe? Please provide estimates of the market shares these players represent, if possible. Do they provide both issuing and acquiring services or solely issuing and solely acquiring services?
3. What is the degree of **competition** in card scheme, acquiring, issuing and processing activities? What is the consequence of this level of competition (e.g., on consumers, on the market)? Please explain.

- 
4. Over the last 4 years have you seen a **change in the structure of the card payments market** (e.g. entry of new players - big tech, fintech, new banks, payment institutions, cross-border issuers / acquirers, independent processors on either side of the market)? Please explain and quantify the change in market shares if possible.
 5. In your view, how have **entry / exit** of issuers / acquirers / processors affected the market (new competitors, impact of mergers and acquisition...)? Please explain.
 6. How have the **services offered by different market players** evolved (services offered by issuers, role of card schemes, services offered by acquirers, services offered by independent processors, role of other players)?

(Ask if association represents card schemes and/or acquirers)

7. Have you seen a change in the importance of **cross-border acquiring** in the market? Is there a difference between offline and online transactions? How does it differ by Member State and by type of card? Please explain.

(Ask if association represents issuers)

8. Have you seen a change in the importance of **cross-border issuing** in the market? How does it differ by Member State and by type of card? Please explain.

(Ask if association represents card schemes, issuers and/or acquirers)

Evolution of fees

9. How have **total card scheme fees** faced by issuers, acquirers and merchants evolved by type of card (credit, debit, commercial) since 1 January 2018? Are there differences between different card schemes / acquirers / issuers / Member States? Please explain.
10. Are you aware of any **new fees** introduced since 1 January 2018 by type of card (credit, debit, commercial)? Are these new fees related to issuing, acquiring, processing or to the card scheme? How have these new fees been explained and justified? (e.g. to compensate for new services)
11. Have any mechanisms (other than IFs) attempted to balance the issuing and acquiring sides of the market gained in prominence? Please explain.
12. To what extent are you aware of:
 - **Market Development Funds,**
 - **Innovation Funds or**
 - **equivalent to the above?**
 - **Rebates or discounts on scheme fees?**

If yes, please describe briefly their functioning, differentiating by Member State when appropriate.

(Ask if association represents card schemes and/or acquirers)

13. How have **merchant service charges** evolved by type of card (credit, debit, commercial) since 1 January 2018? Are there differences between different card schemes / acquirers / Member States. Please explain.
14. In your view, are these changes in merchant service charges a result of **changes in interchange fees, processing fees, card scheme fees or other fees**? Are there

differences between different card schemes / acquirers / Member States? Please explain.

Blended and unblended fee schedules

(Ask if association represents card schemes and acquirers)

15. What is the **prevalence of blended and unblended** fee schedules (e.g. IF++ contracts) among merchants? Could you specify the main reasons behind this?

Prompt (if needed): lack of administrative capacity, lack of interest, technical obstacles, lack of information or offering by acquirers

16. In the case of unblended fee schedules, **what information is provided** to merchants by acquiring companies to distinguish between fee elements (i.e., interchange fees, processing fees and acquiring fees)?

17. **At what point in time** information is provided to merchants on fees? (e.g. by default, when contracts are renewed, or the first time a contract is entered into, on request)? [for acquirers: do you plan annual reviews of contract terms to take potential fees increase into account?]

18. To what extent are merchants provided with options to **opt-in or opt-out** of blended/unblended fee options? How does this differ by merchant size or sector?

19. In your opinion, what are the **main obstacles** for merchants in switching acquirers?
Prompt (if needed): 'lack of transparency in pricing of acquiring services, contractual terms for acquiring contracts/indefinite duration of such contracts, possible lack of portability of POS terminals and/or early termination fees for POS terminal contracts', other?

Co-badging and choice of application at point of sale *[this is for all]*

20. To your knowledge, to what extent do merchants have in place **priority selection** at the point of sale, favouring a particular payment application? If they do not, explain why.

Prompt (if needed): not all wallets/applications are able to make use of NFC/QR/BLE, only one payment application/AID is presented/sent to the terminal, lack of update of terminals, current terminals not supporting choice, retailers are unable to identify brand and/or category of cards, other?

21. Can consumers upload a co-badged card or a card-based payment application of their choice in their mobile wallets, smartphones or wearables (provided they are technically compatible with the device)? If not, quantify the magnitude of the issue if possible, and explain the difficulties they are facing/the reasons why?

Prompt (if needed): technical obstacles are making co-badging difficult, including co-badged cards being uploaded as two mono-branded cards/ only one token can be uploaded on a wallet/ only one token fully authenticated, and as a consequence prioritised?

22. To your knowledge, when using a merchant's card reader (or payment interface in the case of e-commerce) are consumers (when using a co-badged card, digital wallet, or wearable device) effectively **able to choose** which payment brand/category they wish when making a purchase?

23. To your knowledge, **are consumers aware** of the possibility to choose their preferred payment application at the POS terminal?

24. In your experience, what are the main **obstacles** that limit effective implementation of the choice of the customer (e.g. when using a co-badged card, digital wallet, or wearable device)?

Prompt (if needed): legal / technical obstacles? Lack of awareness? Limited transparency about how to make a choice? Lack of merchant follow-through? Lack of incentives, including rebates? Cost of terminal updates?

25. Are you aware of technical obstacles limiting choice, including not all wallets/applications being enabled to use NFC/QR/BLE, co-badged cards uploaded as two mono-branded cards and only one Application Identifier (AID) is sent to the POI (in case of a virtual co-badged card, both AIDs are sent?), one token is prioritised e.g. at tokenisation or consumers are obliged to choose a preferred payment application/token at enrolment?

In your view, do **smaller merchants** face greater difficulties in offering choice of payment application to consumers? Why?

Closing questions

26. Are you aware of any documents, reports, and position papers we should review in the context of this study?

27. Have you published any studies on the impact of the Regulation on your members? Have you dealt with complaints from your members?

28. Would you be able to provide contact details of stakeholders that we should contact for the study? Would you also be able to circulate our list of questions with your members?

Annex 2 Survey questionnaire (4 party card schemes)

The data requested in this questionnaire is collected as part of a “study on new developments in card-based payment markets, including as regards relevant aspects of the application of the Interchange Fee Regulation” (the “study”) awarded to a consortium led by VVA Brussels SPRL in partnership with GDCC and EPCA.

The study was commissioned by the European Commission, DG Competition.

The purpose of the study is to assess new developments in the card-based payment markets, which are not strictly limited to the scope of the Interchange Fee Regulation (IFR). The study will culminate in a final report (“the study report”), scheduled to be submitted to the European Commission by October 2023.

A letter from the European Commission requesting your support to the consortium in the provision of data for the study is attached to this questionnaire.

We understand the sensitive nature of the information requested in this questionnaire. All data collected as part of the study will be stored safely on our system and it will not be shared outside the study team. Any data you share with us will strictly only be used for the purpose of the study.

The questionnaires you submit to us will not be made available to anyone outside the project team and any data will only be shared with the European Commission in aggregated form as part of the analysis in the study report.

Thank you very much in advance for agreeing to fill in this questionnaire! Your support is essential to the success of the study and we look forward to working with you.

I. About you

1. Please indicate the name of the organisation that you represent:

2. Please identify the EU Member States in which your company (including connected undertakings) is economically active providing services and - for each such Member State - indicate whether you provide data for this Member State.

Member State	Member State(s) in which your company is active (incl. undertakings)	Please indicate if you provide data for this Member State (otherwise please nominate an alternative contact)	Please nominate the responsible person for the given Member State (name and email address)
Czech Republic			
Denmark			
France			
Germany			
Greece			
Ireland			
Italy			
Lithuania			
The Netherlands			

Poland			
Portugal			
Sweden			

Note: Please consider **prepaid cards as debit cards**. (if no differentiation is required); Please consider only card-based payment transactions (excl. cash withdrawals).

3. For each of the Member States where you are active could you please provide the following key statistics (fields shaded in light blue are optional).

Payment transactions could be:

- *domestic (initiated by cards issued in Member State X)*
- *intra-regional (initiated by cards issued in other states within the EEA)*
- *inter-regional (initiated by cards, issued outside EEA)*

(in EUR or indicate currency)	2018	2019	2020	2021	2022 (or latest available – specify)
Consumer Debit cards					
Total number of cards in circulation					
Total number of domestic payment transactions					
• Of which card present (CP)					
• Of which card not present (CNP)					
Total number of intra-regional* payment transactions					
• Of which card present					
• Of which card not present					
Total number of inter-regional payment transactions*					
• Of which card present					
• Of which card not present					

Total value of domestic payment transactions					
• Of which card present					
• Of which card not present					
Total value of intra-regional payment transactions*					
• Of which card present					
• Of which card not present					
Total value of inter-regional payment transactions*					
• Of which card present					
• Of which card not present					
Consumer Credit cards					
Total number of cards in circulation					
Total number of domestic payment transactions*					
• Of which card present					
• Of which card not present					
Total number of intra-regional payment transactions*					
• Of which card present					
• Of which card not present					
Total number of inter-regional payment transactions*					
• Of which card present					

• Of which card not present					
Total value of domestic payment transactions					
• Of which card present					
• Of which card not present					
Total value of intra-regional payment transactions*					
• Of which card present					
• Of which card not present					
Total value of inter-regional payment transactions*					
• Of which card present					
• Of which card not present					
Commercial cards					
Total number of cards in circulation					
Total number of domestic payment transactions					
Total number of intra-regional payment transactions*					
Total number of inter-regional payment transactions*					
Total value of domestic payment transactions					
Total value of intra-regional payment transactions*					
Total value of inter-regional					

payment transactions*					
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*For the purpose of this questionnaire, values and volumes (i.e number) of transactions are from the merchant perspective i.e. location of merchant determines the type of transaction

II. Scheme fees

In this section, we kindly ask you to provide **annual data on the value of scheme fees, excluding processing fees**, or their equivalent for payment transactions only (excluding cash withdrawals) based on cards issued in Member State X under your card scheme.

Payment transactions could be:

- domestic (initiated by cards issued in Member State X)
- intra-regional (initiated by cards issued in other states within the EEA)
- inter-regional (initiated by cards, issued outside EEA)

4. What are the annualised scheme fees (excluding processing fees) paid to you by issuers in Member State X? [differentiate by card category if available] (fields shaded in light blue are optional)

(in EUR or indicate currency)	2018	2019	2020	2021	2022 (or latest available – specify)
Consumer Debit cards					
Total value of scheme fees based on the number of cards issued					
Other (please specify)					
Total value of scheme fees for domestic payment transactions					
• Of which card present					
• Of which card not present					
Total value of scheme fees for intra-regional payment transactions					
• Of which card present					
• Of which card not present					
Total value of scheme fees for inter-regional payment transactions					
• Of which card present					
• Of which card not present					
Consumer Credit cards					

Total value of scheme fees based on the number of cards issued					
Other (please specify)					
Total value of scheme fees for domestic payment transactions					
• Of which card present					
• Of which card not present					
Total value of scheme fees for intra-regional payment transactions					
• Of which card present					
• Of which card not present					
Total value of scheme fees for inter-regional payment transactions					
• Of which card present					
• Of which card not present					
Commercial cards					
Total value of scheme fees based on the number of cards issued					
Other (please specify)					
Total value of scheme fees for domestic payment transactions					
Total value of scheme fees for intra-regional payment transactions*					
Total value of scheme fees for inter-regional payment transactions*					

*For the purpose of this questionnaire, values and volumes (i.e number) of transactions are from the merchant perspective i.e. location of merchant determines the type of transaction

If you left some fields blank, please indicate the reason for not providing the data:

- The data is not available
- We could not provide the data due to a binding confidentiality agreement
- Other, please specify: _____

5. What are the annualised scheme fees (excluding processing fees) paid to you by acquirers who are active (i.e acquiring transactions from merchants located) in Member State X? [differentiate by card category if available] (fields shaded in light blue are optional)

(in EUR or indicate currency)	2018	2019	2020	2021	2022 (or latest available – specify)
Consumer Debit cards					
Total value of scheme fees for domestic payment transactions					
• Of which card present					
• Of which card not present					
Total value of scheme fees for intra-regional payment transactions					
• Of which card present					
• Of which card not present					
Total value of scheme fees for inter-regional payment transactions					
• Of which card present					
• Of which card not present					
Total value of all scheme fees (including any other scheme fees)					
Consumer Credit cards					
Total value of scheme fees for domestic payment transactions					
• Of which card present					
• Of which card not present					

Total value of scheme fees for intra-regional payment transactions					
• Of which card present					
• Of which card not present					
Total value of scheme fees for inter-regional payment transactions					
• Of which card present					
• Of which card not present					
Total value of all scheme fees (including any other scheme fees)					
Commercial cards					
Total value of scheme fees for domestic payment transactions					
Total value of scheme fees for intra-regional payment transactions*					
Total value of scheme fees for inter-regional payment transactions*					
Total value of all scheme fees (including any other scheme fees)					

*For the purpose of this questionnaire, values and volumes (i.e number) of transactions are from the merchant perspective i.e. location of merchant determines the type of transaction

If you left some fields blank, please indicate the reason for not providing the data:

- The data is not available
- We could not provide the data due to a binding confidentiality agreement
- Other, please specify: _____

6. Have you introduced new components of gross scheme fees or their equivalent paid to you by issuers in Member State X since 1 January 2018?

- Yes, please quantify: _____ and differentiate by Member State, category or cards or type of transaction as relevant/available
- No

7. Have you removed components of gross scheme fees or their equivalent paid to you by issuers in Member State X since 1 January 2018?

- Yes, please quantify: _____ and differentiate by Member State, category or cards or type of transaction as relevant/available
- No

8. Have you introduced new components of gross scheme fees or their equivalent paid to you by acquirers in Member State X since 1 January 2018?

- Yes, please quantify _____ and differentiate by Member State, category or cards or type of transaction as relevant/available _____
- No

9. Have you removed components of gross scheme fees or their equivalent paid to you by acquirers in Member State X since 1 January 2018?

- Yes, please quantify _____ and differentiate by Member State, category or cards or type of transaction as relevant/available _____
- No

10. Do you collect Market Development Funds, Innovation Funds or equivalent?

If yes, please describe briefly their functioning, differentiating by Member State when appropriate

11. If yes, what are the annualised fees for such funds, paid to you by issuers in Member State X? What is the proportion of such funds which is re-distributed to issuers, and which is spent on horizontal programmes, for instance security measures? (fields shaded in light blue are optional)

(in EUR or indicate currency)	2018	2019	2020	2021	2022 (or latest available – specify)
All fees for Market Development Funds, Innovation Funds or equivalent					
Proportion of funds re-distributed to issuers (%)					

Proportion of funds for horizontal programmes (%)					
Other please specify (%)					

If you left some fields blank, please indicate the reason for not providing the data:

- The data is not available
- We could not provide the data due to a binding confidentiality agreement
- Other, please specify: _____

III. Processing fees

In this section, we kindly ask you to provide **annual data on the value of processing fees (i.e. fees for processing services as per Art 7 IFR)** or their equivalent for payment transactions (**excluding cash withdrawals**) based on cards issued in Member State X under your card scheme.

Payment transactions could be:

- domestic (initiated by cards issued in Member State X)
- intraregional (initiated by cards issued in other states within the EEA)
- interregional (initiated by cards, issued outside EEA)

12. What are the annualised processing fees paid to you by issuers in Member State X? [differentiate by card category if available] (fields shaded in light blue are optional)

(in EUR or indicate currency)	2018	2019	2020	2021	2022 (or latest available – specify)
Consumer Debit cards					
Total value of processing fees for domestic payment transactions					
• Of which card present					
• Of which card not present					
Total value of processing fees for intra-regional payment transactions					
• Of which card present					
• Of which card not present					

Total value of processing fees for inter-regional payment transactions					
• Of which card present					
• Of which card not present					
Total value of processing fees					
Consumer Credit cards					
Total value of processing fees for domestic payment transactions					
• Of which card present					
• Of which card not present					
Total value of processing fees for intra-regional payment transactions					
• Of which card present					
• Of which card not present					
Total value of processing fees for inter-regional payment transactions					
• Of which card present					
• Of which card not present					
Total value of processing fees					
Commercial cards					
Total value of processing fees for domestic payment transactions					
Total value of processing fees					

for intra-regional payment transactions*					
Total value of processing fees for inter-regional payment transactions*					
Total value of processing fees					

*For the purpose of this questionnaire, values and volumes (i.e number) of transactions are from the merchant perspective i.e. location of merchant determines the type of transaction

If you left some fields blank, please indicate the reason for not providing the data:

- The data is not available
- We could not provide the data due to a binding confidentiality agreement
- Other, please specify: _____

13. What are the processing fees paid to you by acquirers who are active (i.e. acquiring transactions from merchants located) in Member State X? [differentiate by card category if available] (fields shaded in light blue are optional)

(in EUR or indicate currency)	2018	2019	2020	2021	2022 (or latest available – specify)
Consumer Debit cards					
Total value of processing fees for domestic payment transactions					
• Of which card present					
• Of which card not present					
Total value of processing fees for intra-regional payment transactions					
• Of which card present					
• Of which card not present					
Total value of processing fees for inter-regional payment transactions					

• Of which card present					
• Of which card not present					
Total value of processing fees					
Consumer Credit cards					
Total value of processing fees for domestic payment transactions					
• Of which card present					
• Of which card not present					
Total value of processing fees for intra-regional payment transactions					
• Of which card present					
• Of which card not present					
Total value of processing fees for inter-regional payment transactions					
• Of which card present					
• Of which card not present					
Total value of processing fees					
Commercial cards					
Total value of processing fees for domestic payment transactions					
Total value of processing fees for intra-regional payment transactions*					
Total value of processing fees					

for inter-regional payment transactions*					
Total value of processing fees					

*For the purpose of this questionnaire, values and volumes (i.e number) of transactions are from the merchant perspective i.e. location of merchant determines the type of transaction

If you left some fields blank, please indicate the reason for not providing the data:

- The data is not available
- We could not provide the data due to a binding confidentiality agreement
- Other, please specify: _____
-

IV. Interchange fees

In this section, we kindly ask you to provide **annual data on interchange fees or their equivalent** paid from acquirers to issuers for payment transactions only (excluding cash withdrawals on cards issued in Member State X under your card scheme).

Payment transactions could be:

- domestic (initiated by cards issued in Member State X)
- intra-regional (initiated by cards issued in other states within the EEA)
- inter-regional (initiated by cards, issued outside EEA)

14. What are the annualised interchange fees paid to you per card type and transaction category in Member State X? (fields shaded in light blue are optional)

(in EUR or indicate currency)	2018	2019	2020	2021	2022 (or latest available – specify)
Consumer Debit cards					
Total value of interchange fees for domestic transactions					
• Of which card present					
• Of which card not present					
Total value of interchange fees for intra-regional payment transactions					
• Of which card present					
• Of which card not present					

Total value of interchange fees for inter-regional payment transactions					
• Of which card present					
• Of which card not present					
Total value of interchange fees					
Consumer Credit cards					
Total value of interchange fees for domestic payment transactions					
• Of which card present					
• Of which card not present					
Total value of interchange fees for intra-regional payment transactions					
• Of which card present					
• Of which card not present					
Total value of interchange fees for inter-regional payment transactions					
• Of which card present					
• Of which card not present					
Total value of interchange fees					
Commercial cards					
Total value of interchange fees for domestic payment transactions					
Total value of interchange fees					

for intra-regional payment transactions*					
Total value of interchange fees for inter-regional payment transactions*					
Total value of interchange fees					

If you left some fields blank, please indicate the reason for not providing the data:

- The data is not available
- We could not provide the data due to a binding confidentiality agreement
- Other, please specify: _____

V. Direct and indirect card payments, incentives and rebates granted to issuers and acquirers

Finally, we kindly ask you to provide **annual data on the value of direct and indirect card payments, bonuses and incentives**, including free consultancy hours/marketing and non-monetary ("Value in Kind" VIK) services, provided to issuers, acquirers and merchants.

15. What is the total value of all direct and indirect card payments, bonuses and incentives, including free consultancy hours, discounts and non-monetary ("Value in Kind" VIK) services on scheme fees or processing fees your company has granted to issuers in Member State X? (Please differentiate by type of transaction where possible) (fields shaded in light blue are optional)

(in EUR or indicate currency)	2018	2019	2020	2021	2022 (or latest available – specify)
Total value of all payments, bonuses and incentives on scheme fees					
Of which for consumer debit cards					
Of which for consumer credit cards					
Total value of all payments, bonuses and incentives on processing fees					

If you left some fields blank, please indicate the reason for not providing the data:

- The data is not available
- We could not provide the data due to a binding confidentiality agreement
- Other, please specify: _____

16. What types of direct and indirect card payments, bonuses and incentives, including free consultancy hours, discounts and non-monetary (“Value in Kind” VIK) services on scheme fees has your company granted to issuers in Member State x since 2018? (multiple answers possible) (fields shaded in light blue are optional)

(in EUR or indicate currency)	Yes/No	Description	Proportion of the total under question 15				
			2018	2019	2020	2021	2022 (or latest available – specify)
Value of discounts linked to volume of transactions							
Value of discounts linked to value of transactions							
Value of other discounts, please specify							
Value of marketing support (financial or other)							
Value of free consultancy hours							
Other non-monetary (VIK) services							
Other, please specify:							

If you left some fields blank, please indicate the reason for not providing the data:

- The data is not available
- We could not provide the data due to a binding confidentiality agreement
- Other, please specify: _____

17. What is the total value of all direct and indirect card payments, bonuses and incentives, including free consultancy hours, discounts and non-monetary

(“Value in Kind” VIK) services on scheme fees or processing fees your company has granted to acquirers who are active in Member State X? (Please differentiate by type of transaction where possible) (fields shaded in light blue are optional)

(in EUR or indicate currency)	2018	2019	2020	2021	2022 (or latest available – specify)
Total value of all payments, bonuses and incentives on scheme fees					
Total value of all payments, bonuses and incentives on processing fees					

If you left some fields blank, please indicate the reason for not providing the data:

- The data is not available
- We could not provide the data due to a binding confidentiality agreement
- Other, please specify: _____

18. What types of direct and indirect card payments, bonuses and incentives, including free consultancy hours, discounts and non-monetary (“Value in Kind” VIK) services on scheme or processing fees has your company granted to acquirers in Member State x since 2018? (multiple answers possible) (fields shaded in light blue are optional)

(in EUR or indicate currency)	Yes/No	Description	Proportion of the total under question 17				
			2018	2019	2020	2021	2022 (or latest available – specify)
Value of discounts linked to volume of transactions							
Value of discounts linked to value of transactions							
Value of other discounts, please specify							
Value of marketing support							

(financial or other)							
Value of free consultancy hours							
other non monetary (VIK) services							
Other, please specify:							

Annex 3 Survey questionnaire (acquirers)

The data requested in this questionnaire is collected as part of a “study on new developments in card-based payment markets, including as regards relevant aspects of the application of the Interchange Fee Regulation” (the “study”) awarded to a consortium led by VVA Brussels SPRL in partnership with GDCC and EPCA.

The study was commissioned by the European Commission, DG Competition.

The purpose of the study is to assess new developments in the card-based payment markets, which are not strictly limited to the scope of the Interchange Fee Regulation (IFR). The study will culminate in a final report (“the study report”), scheduled to be submitted to the European Commission by October 2023.

A letter from the European Commission requesting your support to the consortium in the provision of data for the study is attached to this questionnaire.

We understand the sensitive nature of the information requested in this questionnaire. All data collected as part of the study will be stored safely on our system and it will not be shared outside the study team. Any data you share with us will strictly only be used for the purpose of the study.

The questionnaires you submit to us will not be made available to anyone outside the project team and any data will only be shared with the European Commission in aggregated form as part of the analysis in the study report.

Thank you very much in advance for agreeing to fill in this questionnaire! Your support is essential to the success of the study and we look forward to working with you.

I. About you

1. Please indicate the name of the organisation that you represent:

2. Please identify the EU Member States in which your company (including connected undertakings) is economically active providing acquiring services and - for each such Member State – indicate whether you provide data for this Member State.

Member State	Member State(s) in which your company is active (incl. undertakings)	Please indicate if you provide data for this Member State (otherwise please nominate an alternative contact)	Please nominate the responsible person for the given Member State (name and email address)
Czech Republic			
Denmark			
France			
Germany			
Greece			
Ireland			
Italy			
Lithuania			
The Netherlands			
Poland			
Portugal			

Sweden			
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3. For each of the Member States where you are active could you please provide the following key statistics for your acquiring business (fields shaded in light blue are optional)

Payment transactions could be:

- *domestic (initiated by cards issued in Member State X)*
- *intra-regional (initiated by cards issued in other states within the EEA)*
- *inter-regional (initiated by cards, issued outside EEA)*

Please note that prepaid cards are considered as debit cards for the purpose of this questionnaire

(EUR or other currency, please indicate)	2018	2019	2020	2021	2022 (or latest available, please specify)
Total card-based sales acquiring volume (excl. ATM)					
<i>Of which: processed by card scheme network</i>					
Total number of merchant contracts**					
Total number of POS terminals					
Consumer Debit cards					
Total number of domestic payment transactions					
• Of which card present (CP)					
• Of which card not present (CNP)					
Total number of intra-regional payment transactions					
• Of which card present					
• Of which card not present					
Total number of inter-regional					

payment transactions*					
• Of which card present					
• Of which card not present					
Total value of domestic payment transactions*					
• Of which card present					
• Of which card not present					
Total value of intra-regional payment transactions*					
• Of which card present					
• Of which card not present					
Total value of inter-regional payment transactions*					
• Of which card present					
• Of which card not present					
Consumer Credit cards					
Total number of domestic payment transactions					
• Of which card present					
• Of which card not present					
Total number of intra-regional payment transactions*					
• Of which card present					
• Of which card not present					
Total number of inter-regional					

payment transactions*					
• Of which card present					
• Of which card not present					
Total value of domestic payment transactions					
• Of which card present					
• Of which card not present					
Total value of intra-regional payment transactions					
• Of which card present					
• Of which card not present					
Total value of inter-regional payment transactions					
• Of which card present					
• Of which card not present					
Commercial cards					
Total number of domestic payment transactions					
Total number of intra-regional payment transactions					
Total number of inter-regional payment transactions*					
Total value of domestic payment transactions					
Total value of intra-regional payment transactions					

Total value of inter-regional payment transactions*					
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* For the purpose of this questionnaire, values and volumes from the merchant perspective have to be provided i.e. location of merchant allocates the transaction

** When a framework contract with a merchant covering more than one of those Member States or the entire EEA is in place, the countries covered should be taken into account when filling up this questionnaire.

II. Scheme fees

In this section, we kindly ask you to provide **annual data on the value of scheme fees (in EUR), excluding processing fees, or their equivalent for payment transactions (excluding cash withdrawals) based on transactions acquired from merchants located in Member State X per card scheme.**

Payment transactions could be:

- domestic (initiated by cards issued in Member State X)
- intra-regional (initiated by cards issued in other states within the EEA)
- inter-regional (initiated by cards, issued outside EEA)

4. What are the annualised scheme fees (excluding processing fees) you pay to card schemes in Member State X? [differentiate by card category if available] (fields shaded in light blue are optional)

Mastercard, (EUR or other currency, please indicate)	2018	2019	2020	2021	2022 (or latest available, please specify)
Consumer Debit cards					
Total value of scheme fees for domestic payment transactions					
• Of which card present					
• Of which card not present					
Total value of scheme fees for intra-regional payment transactions					
• Of which card present					
• Of which card not present					
Total value of scheme fees for inter-regional					

payment transactions					
• Of which card present					
• Of which card not present					
Other, please specify					
Consumer Credit cards					
Total value of scheme fees for domestic payment transactions					
• Of which card present					
• Of which card not present					
Total value of scheme fees for intra-regional payment transactions					
• Of which card present					
• Of which card not present					
Total value of scheme fees for inter-regional payment transactions					
• Of which card present					
• Of which card not present					
Other, please specify					
Commercial cards					
Total value of scheme fees for domestic payment transactions					
Total value of scheme fees for intra-regional payment transactions					
Total value of scheme fees for					

inter-regional payment transactions					
Other, please specify					

VISA, (EUR or other currency, please indicate)	2018	2019	2020	2021	2022 (or latest available, please specify)
Consumer Debit cards					
Total value of scheme fees for domestic payment transactions					
• Of which card present					
• Of which card not present					
Total value of scheme fees for intra-regional payment transactions					
• Of which card present					
• Of which card not present					
Total value of scheme fees for inter-regional payment transactions					
• Of which card present					
• Of which card not present					
Other, please specify					
Consumer Credit cards					
Total value of scheme fees for domestic payment transactions					
• Of which card present					

• Of which card not present					
Total value of scheme fees for intra-regional payment transactions					
• Of which card present					
• Of which card not present					
Total value of scheme fees for inter-regional payment transactions					
• Of which card present					
• Of which card not present					
Other, please specify					
Commercial cards					
Total value of scheme fees for domestic payment transactions					
Total value of scheme fees for intra-regional payment transactions					
Total value of scheme fees for inter-regional payment transactions					
Other, please specify					

Domestic card scheme XY, (EUR or other currency, please indicate)	2018	2019	2020	2021	2022 (or latest available, please specify)
Consumer Debit cards					
Total value of scheme fees for domestic					

payment transactions					
• Of which card present					
• Of which card not present					
Total value of scheme fees for intra-regional payment transactions					
• Of which card present					
• Of which card not present					
Total value of scheme fees for inter-regional payment transactions					
• Of which card present					
• Of which card not present					
Other, please specify					
Consumer Credit cards					
Total value of scheme fees for domestic payment transactions					
• Of which card present					
• Of which card not present					
Total value of scheme fees for intra-regional payment transactions					
• Of which card present					
• Of which card not present					
Total value of scheme fees for inter-regional payment transactions					

• Of which card present					
• Of which card not present					
Other, please specify					
Commercial cards					
Total value of scheme fees for domestic payment transactions					
Total value of scheme fees for intra-regional payment transactions					
Total value of scheme fees for inter-regional payment transactions					
Other, please specify					

If you left some fields blank, please indicate the reason for not providing the data:

- The data is not available
- We could not provide the data due to a binding confidentiality agreement
- Other, please specify: _____

5. Do you pay fees to or receive revenue from card schemes in the context of Market Development Funds, Innovation Funds or an equivalent?

If yes, please describe briefly their stated purpose, differentiating by Member State (if you are active in multiple Member States) and by scheme

6. If yes, what is the annualised value of fees you pay to or receive from card schemes in Member State X?

(EUR or other currency, please specify)	2018	2019	2020	2021	2022 (or latest available please specify)
Mastercard					
All fees paid for Market Development Funds, Innovation Funds or equivalent					
Total value of funds received					

VISA					
All fees paid for Market Development Funds, Innovation Funds or equivalent					
Total value of funds received					
Domestic card scheme XY					
All fees paid for Market Development Funds, Innovation Funds or equivalent					
Total value of funds received					

If you left some fields blank, please indicate the reason for not providing the data:

- The data is not available
- We could not provide the data due to a binding confidentiality agreement
- Other, please specify: _____

7. Have you experienced an introduction of new scheme fees since 1 January 2018? If so, could you describe and quantify the main new scheme fees per scheme?

- We have not faced any new components to gross scheme fees
- If yes, please describe when the fee was introduced, what it is levied on, its structure, rationale and driver.

New fee	Year of introduction	Rationale	Driver of the fee
<i>Example: CNP fraud fee</i>	<i>Example: June 2018</i>	<i>Example: Increase in fraud</i>	<i>Example Debit cards, CNP, inter-regional transactions</i>

III. Processing fees

In this section, we kindly ask you to provide **annual data on the value of processing fees (i.e. fees for processing services as per Art 7 IFR, e.g. fees for clearing, settlement, authorisation)** paid to the card scheme or their equivalent (e.g. card scheme owned processors) for payment transactions (**excluding cash withdrawals**) based on payment transactions acquired from merchants located in Member State X.

Payment transactions could be:

- domestic (initiated by cards issued in Member State X)
- intra-regional (initiated by cards issued in other states within the EEA)
- inter-regional (initiated by cards, issued outside EEA)

8. What are the annualised processing fees you pay for payment transactions in Member State X? [differentiate by card category if available] (fields shaded in light blue are optional)

Mastercard (EUR or other currency, please indicate)	2018	2019	2020	2021	2022 (or latest available, please specify)
Consumer Debit cards					
Total value of processing fees for domestic payment transactions					
• Of which card present					
• Of which card not present					
Total value of processing fees for intra-regional payment transactions					
• Of which card present					
• Of which card not present					
Total value of processing fees for inter-regional payment transactions					
• Of which card present					
• Of which card not present					
Consumer Credit cards					
Total value of processing fees for domestic payment transactions					
• Of which card present					
• Of which card not present					
Total value of processing fees for intra-regional					

payment transactions					
• Of which card present					
• Of which card not present					
Total value of processing fees for inter-regional payment transactions					
• Of which card present					
• Of which card not present					
Commercial cards					
Total value of processing fees for domestic payment transactions					
Total value of processing fees for intra-regional payment transactions					
Total value of processing fees for inter-regional payment transactions					

Visa (EUR or other currency, please indicate)	2018	2019	2020	2021	2022 (or latest available, please specify)
Consumer Debit cards					
Total value of processing fees for domestic payment transactions					
• Of which card present					
• Of which card not present					
Total value of processing fees for intra-regional					

payment transactions					
• Of which card present					
• Of which card not present					
Total value of processing fees for inter-regional payment transactions					
• Of which card present					
• Of which card not present					
Consumer Credit cards					
Total value of processing fees for domestic payment transactions					
• Of which card present					
• Of which card not present					
Total value of processing fees for intra-regional payment transactions					
• Of which card present					
• Of which card not present					
Total value of processing fees for inter-regional payment transactions					
• Of which card present					
• Of which card not present					
Commercial cards					
Total value of processing fees for domestic payment transactions					

Total value of processing fees for intra-regional payment transactions					
Total value of processing fees for inter-regional payment transactions					

Domestic Card Scheme XY (EUR or other currency, please indicate)	2018	2019	2020	2021	2022 (or latest available, please specify)
Consumer Debit cards					
Total value of processing fees for domestic payment transactions					
• Of which card present					
• Of which card not present					
Total value of processing fees for intra-regional payment transactions					
• Of which card present					
• Of which card not present					
Total value of processing fees for inter-regional payment transactions					
• Of which card present					
• Of which card not present					
Consumer Credit cards					
Total value of processing fees for domestic payment transactions					

• Of which card present					
• Of which card not present					
Total value of processing fees for intra-regional payment transactions					
• Of which card present					
• Of which card not present					
Total value of processing fees for inter-regional payment transactions					
• Of which card present					
• Of which card not present					
Commercial cards					
Total value of processing fees for domestic payment transactions					
Total value of processing fees for intra-regional payment transactions					
Total value of processing fees for inter-regional payment transactions					

9. **Do the functionally independent (scheme-owned) processing entities your company uses in Member State X offer multi-brand authorisation and clearing?** (in this case, multi-brand authorisation refers to authorisation and clearing of transactions including of cards with payment brands not owned by the card scheme)

	Yes, all	Yes, some	No
Our functionally independent (scheme-owned) processing entity offers multi-brand			

authorisation and clearing			
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10. To your knowledge, are there fully independent processors that deliver clearing, settlement, authorisation services as per Art 7 IFR on the separation between card scheme and processing services for acquiring in Member State X?

- Yes / no. If yes, please indicate the names of the ones you know per Member State

11. Do you use any fully independent processing players as a consequence of Article 7 on the separation between card scheme and processing services (e.g. clearing, settlement, authorisation) for acquiring in Member State X? (fields shaded in light blue are optional)

- Yes/ No. If yes, please indicate which [if possible]

VISA	2018	2019	2020	2021	2022 (or latest available, please specify)
Share of total acquired value that is processed by fully independent processors?					

MASTERCARD	2018	2019	2020	2021	2022 (or latest available, please specify)
Share of total acquired value that is processed by fully independent processors?					

DOMESTIC SCHEME XY	2018	2019	2020	2021	2022 (or latest available, please specify)
Share of total acquired value that is processed by fully independent processors?					

If you left some fields blank, please indicate the reason for not providing the data:

- The data is not available
- We could not provide the data due to a binding confidentiality agreement
- Other, please specify: _____

IV. Interchange fees

In this section, we kindly ask you to provide **annual data on interchange fees or their equivalent** paid by you for payment transactions.

Payment transactions could be:

- domestic (initiated by cards issued in Member State X)
- intra-regional (initiated by cards issued in other states within the EEA)
- inter-regional (initiated by cards, issued outside EEA)

12. What are the annualised interchange fees paid by you per type of card and transaction in Member State X? (fields shaded in light blue are optional)

Mastercard (EUR or other currency, please indicate)	2018	2019	2020	2021	2022 (or latest available, please specify)
Consumer Debit cards					
Total value of interchange fees for domestic transactions					
• Of which card present					
• Of which card not present					
Total value of interchange fees for intra-regional payment transactions					
• Of which card present					
• Of which card not present					
Total value of interchange fees for inter-regional payment transactions					
• Of which card present					
• Of which card not present					
Consumer Credit cards					
Total value of interchange fees for domestic					

payment transactions					
• Of which card present					
• Of which card not present					
Total value of interchange fees for intra-regional payment transactions					
• Of which card present					
• Of which card not present					
Total value of interchange fees for inter-regional payment transactions					
• Of which card present					
• Of which card not present					
Commercial cards					
Total value of interchange fees for domestic payment transactions					
Total value of interchange fees for intra-regional payment transactions					
Total value of interchange fees for inter-regional payment transactions					

Visa (EUR or other currency, please indicate)	2018	2019	2020	2021	2022 (or latest available, please specify)
Consumer Debit cards					
Total value of interchange fees					

for domestic transactions					
• Of which card present					
• Of which card not present					
Total value of interchange fees for intra-regional payment transactions					
• Of which card present					
• Of which card not present					
Total value of interchange fees for inter-regional payment transactions					
• Of which card present					
• Of which card not present					
Consumer Credit cards					
Total value of interchange fees for domestic payment transactions					
• Of which card present					
• Of which card not present					
Total value of interchange fees for intra-regional payment transactions					
• Of which card present					
• Of which card not present					
Total value of interchange fees for inter-regional payment transactions					
• Of which card present					

• Of which card not present					
Commercial cards					
Total value of interchange fees for domestic payment transactions					
Total value of interchange fees for intra-regional payment transactions					
Total value of interchange fees for inter-regional payment transactions					

Domestic card scheme XY (EUR or other currency, please indicate)	2018	2019	2020	2021	2022 (or latest available, please specify)
Consumer Debit cards					
Total value of interchange fees for domestic transactions					
• Of which card present					
• Of which card not present					
Total value of interchange fees for intra-regional payment transactions					
• Of which card present					
• Of which card not present					
Total value of interchange fees for inter-regional payment transactions					
• Of which card present					

• Of which card not present					
Consumer Credit cards					
Total value of interchange fees for domestic payment transactions					
• Of which card present					
• Of which card not present					
Total value of interchange fees for intra-regional payment transactions					
• Of which card present					
• Of which card not present					
Total value of interchange fees for inter-regional payment transactions					
• Of which card present					
• Of which card not present					
Commercial cards					
Total value of interchange fees for domestic payment transactions					
Total value of interchange fees for intra-regional payment transactions					
Total value of interchange fees for inter-regional payment transactions					

If you left some fields blank, please indicate the reason for not providing the data:

- The data is not available
- We could not provide the data due to a binding confidentiality agreement

- Other, please specify: _____

V. Merchant Service Charges

*In this section, we kindly ask you to provide annual data on the **Merchant Service Charges**, including some of its components (scheme fees – including processing fees, interchange fees, and acquirer fees), charged to merchants located in Member State X by your company. When we ask for transactions-based data, we consider acquired card-based sales-transactions by your company in Member State X, including domestic, intraregional and interregional transactions.*

13. Please indicate which size categories you use in your acquiring business with merchants?

- Merchant size category 1 (e.g. small): Please define
- Merchant size category 2 (e.g. medium merchants): Please define
- Merchant size category 3 (e.g. key accounts): Please define

14. Please indicate the total card-based sales acquiring volume (excl. ATM) for each merchant size category

(EUR or other currency, please indicate)	2018	2019	2020	2021	2022 (or latest available, please specify)
Total card-based sales acquiring volume (excl. ATM)					
Merchant size category 1					
Merchant size category 2					
Merchant size category 3					

15. **What are the merchant service charges requested by your company from merchants for different card schemes located in Member State X? Service charge for the provision and maintenance of POS-terminals should be excluded.**

Mastercard (EUR or other currency, please indicate)	2018	2019	2020	2021	2022 (or latest available, please indicate)
Consumer Debit cards					

Total value of MSC					
• Of which: value of MSC charged on small merchants					
○ % interchange fee					
○ % scheme fee					
○ % acquirer fees					
○ % other (specify)					
• Of which: value of MSC charged on medium size merchants					
○ % interchange fee					
○ % scheme fee					
○ % acquirer fees					
○ % other (specify)					
• Of which: value of MSC charged on key account merchants					
○ % interchange fee					
○ % scheme fee					
○ % acquirer fees					
○ % other (specify)					
Consumer Credit cards					
Total value of MSC					
• Of which: value of MSC charged on small merchants					
○ % interchange fee					
○ % scheme fee					
○ % acquirer fees					
○ % other (specify)					

• Of which: value of MSC charged on medium size merchants					
○ % interchange fee					
○ % scheme fee					
○ % acquirer fees					
○ % other (specify)					
• Of which: value of MSC charged on key account merchants					
○ % interchange fee					
○ % scheme fee					
○ % acquirer fees					
○ % other (specify)					
Commercial cards					
Total value of MSC					

VISA (EUR or other currency, please indicate)	2018	2019	2020	2021	2022 (or latest available, please indicate)
Consumer Debit cards					
Total value of MSC					
• Of which: value of MSC charged on small merchants					
○ % interchange fee					
○ % scheme fee					
○ % acquirer fees					
○ % other (specify)					
• Of which: value of MSC charged on medium size merchants					

○ % interchange fee					
○ % scheme fee					
○ % acquirer fees					
○ % other (specify)					
• Of which: value of MSC charged on key account merchants					
○ % interchange fee					
○ % scheme fee					
○ % acquirer fees					
○ % other (specify)					
Consumer Credit cards					
Total value of MSC					
• Of which: value of MSC charged on small merchants					
○ % interchange fee					
○ % scheme fee					
○ % acquirer fees					
○ % other (specify)					
• Of which: value of MSC charged on medium size merchants					
○ % interchange fee					
○ % scheme fee					
○ % acquirer fees					
○ % other (specify)					
• Of which: value of MSC charged on key account merchants					

○ % interchange fee					
○ % scheme fee					
○ % acquirer fees					
○ % other (specify)					
Commercial cards					
Total value of MSC					

Domestic card scheme XY (EUR or other currency, please indicate)	2018	2019	2020	2021	2022 (or latest available, please indicate)
Consumer Debit cards					
Total value of MSC					
• Of which: value of MSC charged on small merchants					
○ % interchange fee					
○ % scheme fee					
○ % acquirer fees					
○ % other (specify)					
• Of which: value of MSC charged on medium size merchants					
○ % interchange fee					
○ % scheme fee					
○ % acquirer fees					
○ % other (specify)					
• Of which: value of MSC charged on key account merchants					
○ % interchange fee					
○ % scheme fee					

○ % acquirer fees					
○ % other (specify)					
Consumer Credit cards					
Total value of MSC					
• Of which: value of MSC charged on small merchants					
○ % interchange fee					
○ % scheme fee					
○ % acquirer fees					
○ % other (specify)					
• Of which: value of MSC charged on medium size merchants					
○ % interchange fee					
○ % scheme fee					
○ % acquirer fees					
○ % other (specify)					
• Of which: value of MSC charged on key account merchants					
○ % interchange fee					
○ % scheme fee					
○ % acquirer fees					
○ % other (specify)					
Commercial cards					
Total value of MSC					

16. Do you request Merchant Service Charges in relation to any other card schemes? If yes, please fill in the above table for each of these schemes

If you left some fields blank, please indicate the reason for not providing the data:

- The data is not available

- We could not provide the data due to a binding confidentiality agreement
- Other, please specify: _____

17. Please identify the proportion of merchants for which you provide information regarding the composition of the MSC, differentiating by categories of merchants if possible?

Type of merchant and fee	proportion of merchants
• All merchants	
○ Interchange fee	All, almost all, about half, almost none, None
○ Scheme fee	All, almost all, about half, almost none, None
○ Acquirer fee	All, almost all, about half, almost none, None
• Small merchants	
○ Interchange fee	All, almost all, about half, almost none, None
○ Scheme fee	All, almost all, about half, almost none, None
○ Acquirer processing fee	All, almost all, about half, almost none, None
• Medium merchants	
○ Interchange fee	All, almost all, about half, almost none, None
○ Scheme fee	All, almost all, about half, almost none, None
○ Acquirer processing fee	All, almost all, about half, almost none, None
• Key account merchants	
○ Interchange fee	All, almost all, about half, almost none, None
○ Scheme fee	All, almost all, about half, almost none, None
○ Acquirer processing fee	All, almost all, about half, almost none, None

18. For each category of merchant, please indicate the proportion for which the fees below (if any) are negotiable?

Type of merchant and fee	Acquirer fee	Scheme fee	Interchange fee	Blended MSC
All merchants	All, almost all, about half, almost none, None	All, almost all, about half, almost none, None	All, almost all, about half, almost none, None	All, almost all, about half, almost none, None
• Small merchant	All, almost all, about half, almost none, None	All, almost all, about half, almost none, None	All, almost all, about half, almost none, None	All, almost all, about half, almost none, None
• Medium merchant	All, almost all, about half, almost none, None	All, almost all, about half, almost none, None	All, almost all, about half, almost none, None	All, almost all, about half, almost none, None

<ul style="list-style-type: none"> Key account merchants 	All, almost all, about half, almost none, None	All, almost all, about half, almost none, None	All, almost all, about half, almost none, None	All, almost all, about half, almost none, None
---	--	--	--	--

19. When is the information on unblended fees (e.g. IF++ contracts) provided to merchants?

On request of the merchant	Always, almost always, about half of the time, almost never, never
When contracts are renewed	Always, almost always, about half of the time, almost never, never
First time the contract enters force	Always, almost always, about half of the time, almost never, never
Other (please specify)	Always, almost always, about half of the time, almost never, never

20. What share of merchants are currently / have recently switched to unblended fee rates and are offered opt-ins when choosing between blended and unblended fee schedules (e.g. IF++ contracts)?

Type of merchant	Offered opt-in to unblended rate	Share of all merchants on unblended fee rates (%)	Share of merchants that switched in last 12 months (%)	Please explain
<ul style="list-style-type: none"> Small merchants 	%	%	%	
<ul style="list-style-type: none"> Medium size merchants 	%	%	%	
<ul style="list-style-type: none"> Key account merchants 	%	%	%	
Total	%	%	%	

21. To your knowledge are there any technical or legal obstacles which may limit merchants in switching from blended to unblended fee schedules (e.g. IF++ contracts)? Please explain for each of the subcategories below identified as relevant

- terms and conditions,
- duration of the contract,
- penalties or other structured fees
- need and costs of hardware or software
- Other (please specify)

VI. Directly and indirectly card-related payments, incentives and rebates granted to acquirers

In this section, we ask you to provide **annual data on the value of direct and indirect card related payments, bonuses and incentives**, including free consultancy hours/marketing and non-monetary ("Value in Kind" VIK) services, provided to you by card schemes (excluding Market Development Fees, Innovation Fees or equivalent; see Question 6).

22. What is the total value of all direct and indirect card-related payments, bonuses and incentives, including free consultancy hours, and discounts on scheme fees or processing fees your company has received from card scheme Y in Member State X, and what is the value of those your company passed on to merchants? (Please differentiate by type of transaction where possible)

(EUR or other currency, please indicate)	2018	2019	2020	2021	2022
VISA					
Total value of all payments, bonuses and incentives					
Value of payments, bonuses and incentives paid to merchants					
MASTERCARD					
Total value of all payments, bonuses and incentives					
Value of payments, bonuses and incentives paid to merchants					
DOMESTIC SCHEME XY					
Total value of all payments, bonuses and incentives					
Value of payments, bonuses and incentives paid to merchants					

If you left some fields blank, please indicate the reason for not providing the data:

- The data is not available
- We could not provide the data due to a binding confidentiality agreement
- Other, please specify: _____

VII. Choice of application at the point of sale

The following questions are related to payments with co-badged payment instruments, according the IFR (2015) defined as: the inclusion of two or more payment brands or payment applications of the same brand on the same card-based payment instrument. Examples: a plastic or virtual card (e.g. in a wallet) with the brand of a domestic and a international brand or branded with two payment categories (debit & credit). In some wallets the virtual equivalent of a co-badged card is loaded instead of two separate brands (or categories), visible to the wallet user, which are linked to the same card.

23. If your company provides Point of Interactions (POIs), e.g. terminals or check-out modules for websites to merchants, what share of those in

Member State X can identify card category and brand(s), allow the cardholder to override the merchants' default payment brand, and choose his or her preferred payment brand or application?

Share of installed POIs in 2021 that allow the merchant to identify the card category and brand(s) and to set a default payment selection at the time of the payment transaction			
• Card (contact)	%		
• Contactless cards and wallets	%		
• E-Commerce			
Share of POIs in 2021 that allow the payer to choose his or her preferred payment instrument, brand, or application (even if merchant has set a default payment selection) % (e.g. via an automatic choice appearing on the POS terminal or by pressing a button before the transaction in-store; or e.g. via a drop down or choice menu online)			
• Card (contact)	%		
• Contactless cards and wallets	%		
• E-commerce	%		
How can the cardholder select which instrument, brand, or application they want to use for a particular transaction at a POI (e.g. are they explicitly asked to choose for each transaction)?			
• Card (contact)	Choice appears automatically	Yellow or other button to be pressed prior to making the transaction	Other, please specify (for instance verbal interaction with merchant)
• Contactless	Choice appears automatically (for instance two taps solution)	Yellow or other button to be pressed prior to making the transaction (one tap)	Other, please specify (for instance verbal interaction with merchant)
• E-commerce	Drop down menu of options (all brands and categories accepted by the merchant)	One option and 'other' to choose another option	Other, please specify

24. How much does your company on average charge your contracted merchants in Member State X to upgrade an average POS-terminal so that cardholders can identify card category and brand, override the merchants' default payment brand, and choose his or her preferred payment brand or application? Please tick the appropriate box.

(EUR)	0-100 EUR	101-200 EUR	201-300 EUR	301-500 EUR	Above 500 EUR	Don't know	We don't offer such POS terminals
My company charges [...] for upgrading a POS-terminal (only one option possible)							

25. To your knowledge are there any technical or legal/contractual obstacles that limit:

- a) merchants choosing a priority selection at the point of interaction:
-) only one payment application/AID (application identifier) is presented/sent to the terminal
 - i) Lack of update of terminals
 - ii) Current terminals do not support choice
 - iii) Retailers cannot identify brand and/or category of cards
 - iv) In the case of mobile wallets, co-badged cards being uploaded as two mono-branded cards and only the AID of the priority token being sent to the POI;
 - v) Only one token/payment application being prioritised when a co-badged card is enrolled on a mobile wallet;
 - vi) Not all mobile wallets/applications being able to make use of NFC/QR/BLE technologies
 - vii) Other, please specify?

(please specify per use case when relevant)

For each choice, please specify the obstacle(s) and its/their impact, making the distinction between the use case (contact cards, contactless cards, e-commerce, mobile wallets) and by merchant sector or size when appropriate.

- b) consumers making a choice of payment application (including overriding the priority selection) at the point of interaction:
-) absence of information by merchants,
 - i) lack of update of terminals,
 - ii) terminals not configured for such choice,
 - iii) seamlessness given priority
 - iv) payment gateways not allowing such choice online,
 - v) Not all mobile wallets/applications being able to make use of NFC/QR/BLE technologies
 - vi) In the case of mobile wallets, co-badged cards being uploaded as two mono-branded cards and only the AID of the priority token being sent to the POI;
 - vii) Only one token/payment application being prioritised when a co-badged card is enrolled on a mobile wallet (e.g; consumers being obliged to choose a preferred payment application/token at enrolment);



viii) Other, please specify

For each choice, please specify the obstacles(s) and its/their impact, making the distinction between the use case (contact cards, contactless cards, e-commerce, mobile wallets) and by merchant sector or size when appropriate.

Annex 4 Survey questionnaire (issuers)

The data requested in this questionnaire is collected as part of a “study on new developments in card-based payment markets, including as regards relevant aspects of the application of the Interchange Fee Regulation” (the “study”) awarded to a consortium led by VVA Brussels SPRL in partnership with GDCC and EPCA.

The study was commissioned by the European Commission, DG Competition.

The purpose of the study is to assess new developments in the card-based payment markets, which are not strictly limited to the scope of the Interchange Fee Regulation (IFR). The study will culminate in a final report (“the study report”), scheduled to be submitted to the European Commission by October 2023.

A letter from the European Commission requesting your support to the consortium in the provision of data for the study is attached to this questionnaire.

We understand the sensitive nature of the information requested in this questionnaire. All data collected as part of the study will be stored safely on our system and it will not be shared outside the study team. Any data you share with us will strictly only be used for the purpose of the study.

The questionnaires you submit to us will not be made available to anyone outside the project team and any data will only be shared with the European Commission in aggregated form as part of the analysis in the study report.

Thank you very much in advance for agreeing to fill in this questionnaire! Your support is essential to the success of the study and we look forward to working with you.

I. About you

1. **Please indicate the name of the company that you represent:**

2. **Please identify the EU Member States in which your company (including connected undertakings) is economically active providing card issuing services and - for each such Member State – indicate whether you provide data for this Member State.**

Member State	Member State(s) in which your company is active (incl. undertakings)	Please indicate if you provide data for this Member State (otherwise please nominate an alternative contact)	Please nominate the responsible person for the given Member State (name and email address)
Czech Republic			
Denmark			
France			
Germany			
Greece			
Ireland			

Italy			
Lithuania			
The Netherlands			
Poland			
Portugal			
Sweden			

Note: Please **consider prepaid cards as debit cards**. Please consider only card-based payment transactions (excl. cash withdrawals).

3. For each of the Member States where you are active could you please provide the following key statistics for your card issuing business? (fields shaded in light blue are optional)

These transactions could be:

- domestic (initiated by cards issued in Member State X)
- intra-regional regional (initiated by cards issued in other states within the EEA)
- inter-regional regional (initiated by cards, issued outside EEA)

(in EUR or indicate currency)	2018	2019	2020	2021	2022 (or latest available, specify)
Mastercard					
Total number of cards in circulation*, of which					
- Consumer debit cards					
- Consumer credit cards					
- Commercial cards					
Total number of payment transactions					
Of which: processed by card scheme network					
VISA					
Total number of cards in circulation*, of which					
- Consumer debit cards					
- Consumer credit cards					
- Commercial cards					
Total number of payment transactions					
Of which: processed by card scheme network					
Domestic card scheme					
Total number of cards in circulation*					
- of which: consumer debit cards					
Of which: co-badged (%)					

- of which consumer credit cards Of which: co-badged (%)					
- of which: commercial cards Of which: co-badged (%)					
Total number of payment transactions					
Of which: processed by card scheme network					
Consumer Debit cards					
Total number of domestic payment transactions					
• Of which card present					
• Of which card not present					
Total number of intra-regional payment transactions					
• Of which card present					
• Of which card not present					
Total number of inter-regional payment transactions					
• Of which card present					
• Of which card not present					
Total value of domestic payment transactions					
• Of which card present					
• Of which card not present					
Total value of intra-regional payment transactions					
• Of which card present					
• Of which card not present					

Total value of inter-regional payment transactions					
• Of which card present					
• Of which card not present					
Consumer Credit cards					
Total number of domestic payment transactions					
• Of which card present					
• Of which card not present					
Total number of intra-regional payment transactions					
• Of which card present					
• Of which card not present					
Total number of inter-regional payment transactions					
• Of which card present					
• Of which card not present					
Total value of domestic payment transactions					
• Of which card present					
• Of which card not present					
Total value of intra-regional payment transactions					
• Of which card present					
• Of which card not present					
Total value of inter-regional payment transactions					
• Of which card present					

• Of which card not present					
Commercial cards					
Total value of transactions					

* Note: Average number of cards in circulation for year X = (number of cards in circulation on 1 Jan X + number of cards in circulation on 31 Dec X)/2.

II. Scheme fees

In this section, we kindly ask you to provide **annual data on the value of scheme fees, excluding processing fees**, or their equivalent for payment transactions (excluding cash withdrawals) generated by cards which are issued to cardholders in Member State X per card scheme.

These transactions could be:

- domestic (initiated by cards issued in Member State X)
- intra-regional (initiated by cards issued in other states within the EEA)
- inter-regional (initiated by cards, issued outside EEA)

4. What are the annualised scheme fees (excluding processing fees) you pay to card schemes for your card issuing business in Member State X? [differentiate by card category if available] (fields shaded in light blue are optional)

Mastercard (EUR or indicate currency)	2018	2019	2020	2021	2022 (or latest available please specify)
Consumer Debit cards					
Total value of fixed scheme fees (i.e. per transaction fees)					
Total value of ad valorem fees (based on transaction value)					
Total value of fees based on the number of cards issued					
Other (please specify)					
Total value of scheme fees for domestic payment transactions					
• Of which card present					
• Of which card not present					

Total value of scheme fees for intra-regional payment transactions					
• Of which card present					
• Of which card not present					
Total value of scheme fees for inter-regional payment transactions					
• Of which card present					
• Of which card not present					
Consumer Credit cards					
Total value of fixed scheme fees (i.e. per transaction fees)					
Total value of ad valorem fees (based on transaction value)					
Total value of fees based on the number of cards issued					
Other (please specify)					
Total value of scheme fees for domestic payment transactions					
• Of which card present					
• Of which card not present					
Total value of scheme fees for intra-regional payment transactions					
• Of which card present					

• Of which card not present					
Total value of scheme fees for inter-regional payment transactions					
• Of which card present					
• Of which card not present					
Commercial cards					
Total value of fixed scheme fees (i.e. per transaction fees)					
Total value of ad valorem fees (based on transaction value)					
Total value of fees based on the number of cards issued					
Other (please specify)					

Visa (EUR or indicate currency)	2018	2019	2020	2021	2022 (or latest available please specify)
Consumer Debit cards					
Total value of fixed scheme fees (i.e. per transaction fees)					
Total value of ad valorem fees (based on transaction value)					
Total value of fees based on the number of cards issued					
Other (please specify)					
Total value of scheme fees for					

domestic payment transactions					
• Of which card present					
• Of which card not present					
Total value of scheme fees for intra-regional payment transactions					
• Of which card present					
• Of which card not present					
Total value of scheme fees for inter-regional payment transactions					
• Of which card present					
• Of which card not present					
Consumer Credit cards					
Total value of fixed scheme fees (i.e. per transaction fees)					
Total value of ad valorem fees (based on transaction value)					
Total value of fees based on the number of cards issued					
Other (please specify)					
Total value of scheme fees for domestic payment transactions					
• Of which card present					
• Of which card not present					

Total value of scheme fees for intra-regional payment transactions					
• Of which card present					
• Of which card not present					
Total value of scheme fees for inter-regional payment transactions					
• Of which card present					
• Of which card not present					
Commercial cards					
Total value of fixed scheme fees (i.e. per transaction fees)					
Total value of ad valorem fees (based on transaction value)					
Total value of fees based on the number of cards issued					
Other (please specify)					

Domestic card scheme XY (EUR or indicate)	2018	2019	2020	2021	2022 (or latest available please specify)
Consumer Debit cards					
Total value of fixed scheme fees (i.e. per transaction fees)					
Total value of ad valorem fees (based on transaction value)					

Total value of fees based on the number of cards issued					
Other (please specify)					
Total value of scheme fees for domestic payment transactions					
• Of which card present					
• Of which card not present					
Total value of scheme fees for intra-regional payment transactions					
• Of which card present					
• Of which card not present					
Total value of scheme fees for inter-regional payment transactions					
• Of which card present					
• Of which card not present					
Consumer Credit cards					
Total value of fixed scheme fees (i.e. per transaction fees)					
Total value of ad valorem fees (based on transaction value)					
Total value of fees based on the number of cards issued					
Other (please specify)					
Total value of scheme fees for					

domestic payment transactions					
• Of which card present					
• Of which card not present					
Total value of scheme fees for intra-regional payment transactions					
• Of which card present					
• Of which card not present					
Total value of scheme fees for inter-regional payment transactions					
• Of which card present					
• Of which card not present					
Commercial cards					
Total value of fixed scheme fees (i.e. per transaction fees)					
Total value of ad valorem fees (based on transaction value)					
Total value of fees based on the number of cards issued					
Other (please specify)					

If you left some fields blank, please indicate the reason for not providing the data:

- The data is not available
- We could not provide the data due to a binding confidentiality agreement
- Other, please specify: _____

5. Do you pay or receive funds from card schemes in the context of Market Development Funds, Innovation Funds or an equivalent?

If yes, please describe briefly their stated purpose, differentiating by Member State (if you are active in multiple Member States)

6. If yes, what is the annualised value of fees you receive from or pay to card schemes in Member State X?

(EUR or indicate currency)	2018	2019	2020	2021	2022 (or latest available please specify)
Mastercard					
All fees paid for Market Development Funds, Innovation Funds or equivalent					
Total value of funds received					
VISA					
All fees paid for Market Development Funds, Innovation Funds or equivalent					
Total value of funds received					
Domestic card scheme XY					
All fees paid for Market Development Funds, Innovation Funds or equivalent					
Total value of funds received					

If you left some fields blank, please indicate the reason for not providing the data:

- The data is not available
- We could not provide the data due to a binding confidentiality agreement
- Other, please specify: _____

7. Have you experienced the introduction of new scheme fees since 1 January 2018? If so, could you describe and quantify the main new scheme fees per scheme?

- We have not faced any new components to gross scheme fees
- If yes, please describe when the fee was introduced, what it is levied on, its structure, rationale and driver **in the table below**.

New fee	Year of introduction	Rationale	Driver of the fee
<i>Example: CNP fraud fee</i>	<i>Example: June 2018</i>	<i>Example: Increase in fraud</i>	<i>Example Debit cards, CNP, inter-regional transactions</i>

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8. What information are you provided with by card schemes regarding the composition of the fees you pay?

Type of fee	Is the information provided	Is the information provided clear
Interchange fee	Yes/no	Yes / no (please explain)
Scheme fee	Yes/no	Yes / no (please explain)
Issuer processing fee	Yes/no	Yes / no (please explain)

9. Please indicate which (if any) of the fees below are negotiable?

Card scheme	Issuer processing fee	Scheme fee	Interchange fee
Mastercard	Yes/no	Yes/no	Yes/no
VISA	Yes/no	Yes/no	Yes/no
Domestic card scheme	Yes/no	Yes/no	Yes/no

10.If you have answered "yes" to any of the above please explain under what conditions and to what extent the fee is negotiable.

Card scheme	Issuer processing fee	Scheme fee	Interchange fee
Mastercard			
VISA			
Domestic card scheme			

III. Processing fees

In this section, we kindly ask you to provide **annual data on the value of processing fees (i.e. fees for processing services as per Art 7 IFR, e.g. fees for clearing, settlement, authorisation), you paid as issuer to the processing unit of the card scheme or their equivalent for payment transactions (excluding cash withdrawals) based on payment transactions by cardholders in Member State X.**

These transactions could be:

- domestic
- intra-regional
- inter-regional

11.What are the annualised processing fees you pay for payment transactions in Member State X? [differentiate by card category if available] (fields shaded in light blue are optional)

Mastercard (in EUR or indicate currency)	2018	2019	2020	2021	2022 (or latest)

					available, specify)
Consumer Debit cards					
Total value of processing fees for domestic payment transactions					
• Of which card present					
• Of which card not present					
Total value of processing fees for intra-regional payment transactions					
• Of which card present					
• Of which card not present					
Total value of processing fees for inter-regional payment transactions					
• Of which card present					
• Of which card not present					
Consumer Credit cards					
Total value of processing fees for domestic payment transactions					
• Of which card present					
• Of which card not present					
Total value of processing fees for intra-regional payment transactions					
• Of which card present					
• Of which card not present					

Total value of processing fees for inter-regional payment transactions					
• Of which card present					
• Of which card not present					
Commercial cards					
Total value of processing fees for domestic payment transactions					
Total value of processing fees for intra-regional payment transactions					
Total value of processing fees for inter-regional payment transactions					

VISA (in EUR or indicate currency)	2018	2019	2020	2021	2022 (or latest available, specify)
Consumer Debit cards					
Total value of processing fees for domestic payment transactions					
• Of which card present					
• Of which card not present					
Total value of processing fees for intra-regional payment transactions					
• Of which card present					
• Of which card not present					
Total value of processing fees					

for inter-regional payment transactions					
• Of which card present					
• Of which card not present					
Consumer Credit cards					
Total value of processing fees for domestic payment transactions					
• Of which card present					
• Of which card not present					
Total value of processing fees for intra-regional payment transactions					
• Of which card present					
• Of which card not present					
Total value of processing fees for inter-regional payment transactions					
• Of which card present					
• Of which card not present					
Commercial cards					
Total value of processing fees for domestic payment transactions					
Total value of processing fees for intra-regional payment transactions					
Total value of processing fees for inter-regional payment transactions					

Domestic Card Scheme XY (in EUR or indicate currency)	2018	2019	2020	2021	2022 (or latest available, specify)
Consumer Debit cards					
Total value of processing fees for domestic payment transactions					
• Of which card present					
• Of which card not present					
Total value of processing fees for intra-regional payment transactions					
• Of which card present					
• Of which card not present					
Total value of processing fees for inter-regional payment transactions					
• Of which card present					
• Of which card not present					
Consumer Credit cards					
Total value of processing fees for domestic payment transactions					
• Of which card present					
• Of which card not present					
Total value of processing fees for intra-regional payment transactions					
• Of which card present					

• Of which card not present					
Total value of processing fees for inter-regional payment transactions					
• Of which card present					
• Of which card not present					
Commercial cards					
Total value of processing fees for domestic payment transactions					
Total value of processing fees for intra-regional payment transactions					
Total value of processing fees for inter-regional payment transactions					

12. To your knowledge, are there fully independent processors that deliver clearing, settlement, authorisation services as per Art 7 IFR on the separation between card scheme and processing services for issuing in Member State X?

- Yes / no

13. Do you use any fully independent processors as a consequence of Article 7 on the separation between card scheme and processing services (e.g. clearing, settlement, authorisation) for issuing in Member State X? (fields shaded in light blue are optional)

- Yes/ No. If yes, please indicate which independent processors you are using [if possible]

For issued VISA cards	2018	2019	2020	2021	2022 (or latest available please specify)
Share of total payment transactions that is processed by	%	%	%	%	%

independent processors?					
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For issued MASTERCARD cards	2018	2019	2020	2021	2022 (or latest available please specify)
Share of total payment transactions that is processed by independent processors?	%	%	%	%	%

For issued cards of DOMESTIC SCHEME XY	2018	2019	2020	2021	2022 (or latest available please specify)
Share of total payment transactions that is processed by independent processors?	%	%	%	%	%

If you left some fields blank, please indicate the reason for not providing the data:

- The data is not available
- We could not provide the data due to a binding confidentiality agreement
- Other, please specify: _____

14. Do the functionally independent (scheme-owned) processing entities your company uses in Member State X offer multi-brand processing services, such as authorisation and clearing? (in this case, multi-brand authorisation refers to processing services for cards which are not governed, branded or not owned by the card scheme)

	Yes, all	Yes, some	No
Our functionally independent (scheme-owned) processing entity offers multi-brand services, such as authorisation and clearing			

IV. Direct and indirect card-related payments, incentives and rebates granted to issuers

Finally, we ask you to provide **annual data on the value of direct and indirect card related payments, bonuses and incentives**, including free consultancy hours/marketing and non-monetary ("Value in Kind" VIK) services, provided to you as issuer by card schemes.

15. What is the total value of all direct and indirect card-related payments, bonuses and incentives, including free consultancy hours, and discounts on scheme or processing fees that your company has received from card schemes in Member State X? (Please differentiate by type of transaction where possible) (fields shaded in light blue are optional)

(EUR or indicate)	2018	2019	2020	2021	2022 (or latest available please specify)
Mastercard					
Total value of all payments, bonuses and incentives					
• Of which for consumer debit cards					
• Of which for consumer credit cards					
• Of which for commercial cards					
• Of which: other					
VISA					
Total value of all payments, bonuses and incentives					
• Of which for consumer debit cards					
• Of which for consumer credit cards					
• Of which for commercial cards					
• Of which: other					
DOMESTIC CARD SCHEME XY					
Total value of all payments, bonuses and incentives					
• Of which for consumer debit cards					
• Of which for consumer credit cards					
• Of which for commercial cards					

• Of which: other					
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If you left some fields blank, please indicate the reason for not providing the data:

- The data is not available
- We could not provide the data due to a binding confidentiality agreement
- Other, please specify: _____

16. What types of direct and indirect card-related payments, bonuses and incentives, including free consultancy hours, and discounts on scheme fees has your company been granted in Member State x since 2018? (multiple answers possible) (fields shaded in light blue are optional)

(EUR or indicate currency)	Yes/No	Card Scheme	Description	Proportion of the total under question 12				
				2018	2019	2020	2021	2022 (or latest available please specify)
Value of discounts linked to volume of transactions								
Value of discounts linked to value of transactions								
Value of other discounts, please specify								
Value of marketing support (financial or other)								
Value of free consultancy hours								
Other non-monetary (VIK) services								
Other, please specify:								

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If you left some fields blank, please indicate the reason for not providing the data:

- The data is not available
- We could not provide the data due to a binding confidentiality agreement
- Other, please specify: _____

V. Co-badging and choice of application at the point of sale-terminal

17. Are you offering co-badged cards (two or more payment brands or payment applications of the same brand on the same card-based payment instrument) in Member State X? If yes, please indicate the brands or payment applications.

18. To your knowledge are there any technical or legal/contractual obstacles that limit in Member State X:

- c) merchants choosing a priority selection at the point of interaction
 - i) only one payment application/AID (application identifier) is presented/sent to the terminal
 - ii) Lack of update of terminals
 - iii) Current terminals do not support choice
 - iv) Retailers cannot identify brand and/or category of cards
 - v) In the case of mobile wallets, co-badged cards being uploaded as two mono-branded cards and only the AID of the priority token being sent to the POI;
 - vi) Only one token/payment application being prioritised when a co-badged card is enrolled on a mobile wallet;
 - vii) Not all mobile wallets/applications being able to make use of NFC/QR/BLE technologies
 - viii) Other, please specify?

For each choice, please specify the obstacle(s) and its/their impact, making the distinction between the use case (contact cards, contactless cards, e-commerce, mobile wallets) and by merchant sector or size when appropriate.

- d) consumers making a choice of payment application (including overriding the priority selection) at the point of interaction,
 - i) absence of information by merchants,
 - ii) lack of update of terminals,
 - iii) terminals not configured for such choice,
 - iv) seamlessness given priority
 - v) payment gateways not allowing such choice online,

- vi) Not all mobile wallets/applications being able to make use of NFC/QR/BLE technologies
- vii) In the case of mobile wallets, co-badged cards being uploaded as two mono-branded cards and only the AID of the priority token being sent to the POI;
- viii) Only one token/payment application being prioritised when a co-badged card is enrolled on a mobile wallet (e.g; consumers being obliged to choose a preferred payment application/token at enrolment);
- ix) Other, please specify

For each choice, please specify the obstacles(s) and its/their impact, making the distinction between the use case (contact cards, contactless cards, e-commerce, mobile wallets) and by merchant sector or size when appropriate.

19. Do you offer a digital wallet for payments by virtual cards/card-based applications in Member State X?

- Yes
- No

20. Can all brands (Mastercard, Visa etc.) and card categories (e.g. debit or credit) for co-badged plastic cards which you are issuing also be inserted by your clients in a wallet/wearable?

- wallet offered by you as issuer?
- wallet offered by a third-party (e.g. Apple Pay, Google Pay, please specify)

if yes, please indicate the virtual usage of the co-badged card In the wallet

- as two or more separate brands (or applications) which could be preselected by the payer
- as virtual co-badged card

If not, please explain the reasons limiting the cardholder's choice in case of a wallet/wearable.

Annex 5 Survey questionnaire (merchants)

I. About you

1. Please indicate the name of the company that you represent: _____
2. Please specify the sector you operate in:
 - Travel
 - Accommodation
 - Rental services (car, others)
 - Petrol
 - Food retail
 - Other retail, please specify: _____
3. In which country is your organisation active? (country list, dropdown menu)
4. In the last financial year, did you sell goods and services online (e-commerce)? Please indicate the proportion of your revenues from online and offline (physical Point-of-Sale) transactions in the last financial year.

Type of transaction	Share of revenue
Offline	%
Online	%
Total	100%

5. What was your total revenue in the last financial year? **EUR or other currency please indicate**
6. What share of this revenue was generated by card payments in the last financial year?

Type of transaction	Share of revenue
Debit cards	%
Credit cards	%
Other cards	%
Non card-based transactions (cash, cheque, PayPal etc.)	%
Total	100%

7. Where available, please indicate approximately how many card payment transactions you process per year and the total value of those transactions in Member State X per scheme Y. Where possible please break this down by type of transaction.

Type of card	2018	2019	2020	2021	2022 (or latest available, please specify)
VISA					
Consumer Debit cards					
Total number of transactions					
Total value of transactions					
Consumer Credit cards					
Total number of transactions					
Total value of transactions					
Commercial Cards					
Total number of transactions					
Total value of transactions					
MASTERCARD					
Consumer Debit cards					
Total number of transactions					
Total value of transactions					
Consumer Credit cards					
Total number of transactions					
Total value of transactions					
Commercial Cards					
Total number of transactions					
Total value of transactions					
DOMESTIC PAYMENT SCHEME XY					
Consumer Debit cards					
Total number of transactions					
Total value of transactions					
Consumer Credit cards					

Total number of transactions					
Total value of transactions					
Commercial Cards					
Total number of transactions					
Total value of transactions					

II. Blended and unblended fee schedules among merchants

8. How many acquirers does your company use for your card-based payment transactions processing of four-party card schemes, such as Mastercard, Visa and domestic card schemes in Member State X? (single choice)
- One acquirer, please indicate which
 - Two acquirers, please indicate which
 - Three acquirers, please indicate which
 - More than three acquirers, please indicate which
9. What type of pricing models for card acquiring services (excluding terminal-related fees or other not-payment related fees) are applied by each of the first three acquirers in Member State X?

	Acquirer 1	Acquirer 2	Acquirer 3
Blended fee schedules (I don't see the breakdown of the fee)			
Unblended fee schedules (which clearly show the interchange fee, the card scheme fee, and the acquiring fee)			
Do not know			
Not applicable			
Other			

[If Q9 <> "Unblended fee schedules"]

10. Please specify the reasons for this: (multiple answers possible)
- We do not have the administrative capacity to handle unblended fee schedules
 - We are not interested / do not consider the composition of card payment related fees to be important
 - We have experienced technical obstacles and limits in using and managing the data provided by our acquirers (e.g., difficulty in understanding and using the fee level, and difficulty in understanding the data sent by the acquirers). Please specify:
 - When we signed our contract with our acquirer an unblended fee was not provided. Please indicate in which year the contract was signed: 2018, 2019, 2020, 2021, 2022.
 - We have requested this information from the acquirer but we have not received it.
 - Other, please specify: _____

[If Q9 = "Unblended fee schedules"]

11. How would you judge the quality of the information provided to you by the acquirer to distinguish the different elements of your fee (i.e., interchange, scheme fees and acquiring fees)? (single choice)

- Very high quality
- High quality
- Moderate quality
- Low quality
- Very low quality
- I do not know/No answer

Please explain your answer: _____

12. In your opinion, how difficult is it to switch acquiring services to another acquirer? (single choice)

- Very difficult
- Difficult
- Easy
- Very easy
- I do not know/No answer

13. What are the main obstacles to switching your acquirer? (multiple choice)

- There are no major obstacles to switching
- Lack of transparency in pricing of acquiring services
- The contractual terms of acquiring contracts
- The duration of acquiring contracts
- Lack of portability of point-of-sale terminals
- Early termination fees for point-of-sale terminal contracts
- Other contractual arrangements that commit to stay with this acquirer partner
- Other, please specify: _____

Please explain your answer: _____

III. Card related fees for merchants

[If Q9 = "Unblended fee schedules"]

14. If available, could you quantify fees per scheme (Mastercard, Visa, local/domestic card scheme if relevant, others) that you pay as part of the Merchant Service Charge (MSC)? (net of any discounts you may receive)

Scheme: Mastercard (in EUR)	2018	2019	2020	2021	2022
Total fees (including interchange fee, card scheme fee, and acquiring fee)					
Consumer credit card fees (including interchange fee, card scheme fee, and acquiring fee)					
Consumer debit card fees (including interchange fee,					

card scheme fee, and acquiring fee)					
Commercial card fees					

Scheme: Visa (in EUR)	2018	2019	2020	2021	2022
Total fees (including interchange fee, card scheme fee, and acquiring fee)					
Consumer credit card fees (including interchange fee, card scheme fee, and acquiring fee)					
Consumer debit card fees (including interchange fee, card scheme fee, and acquiring fee)					
Commercial card fees					

Scheme: Domestic scheme (if relevant) (in EUR)	2018	2019	2020	2021	2022
Total fees (including interchange fee, card scheme fee, and acquiring fee)					
Consumer credit card fees (including interchange fee, card scheme fee, and acquiring fee)					
Consumer debit card fees (including interchange fee, card scheme fee, and acquiring fee)					
Commercial card fees					

[If Q9 = "Unblended fee schedules"]

15. Did you experience a change in the amount of any of the following fees already before the 1 January 2018

- a. card scheme fees (increase, decrease, no change, not sure)
- b. acquiring fees (increase, decrease, no change, not sure)
- c. interchange fee

[If Q9 <> "Unblended fee schedules"]

16. Did you experience a change in the amount of total card fees already before the 1 January 2018

- a. Increase
- b. Decrease
- c. no change
- d. not sure

[If Q15 = "increase or decrease" & Q9 = "Unblended fee schedule"]

17. Could you indicate which part of the total card related fee has changed by card category in Member State X per scheme Y? Please feel free to attach the schedule from your acquirer(s) to this questionnaire if this is easier for you.

	Previous fee* (please specify year)	Current fee* (2022 or latest, please specify)
Consumer credit card		
Scheme fees		
Acquiring fees		
Other (please specify)		
Consumer debit card		
Scheme fees		
Acquiring fees		
Other (please specify)		
Commercial card		
Scheme fees		
Acquiring fees		
Other (please specify)		

* Total transaction-based fee in Euro or other currency please indicate

[If Q16 = "increase or decrease" & Q9 <> "Unblended fee schedule"]

18. Could you indicate which card related fee has changed? Please feel free to attach the schedule from your acquirer to this questionnaire if this is easier for you.

%	Previous fee* (please specify year)	Current fee* (2022 or latest available, please specify)
Consumer credit card		
Consumer debit card		
Commercial card		

* Total transaction-based fee in Euro or other currency please indicate

[If Q9 <> "Unblended fee schedules"]

19. Did you experience the introduction of new card payment related fees (card scheme fee, acquiring fee, or other fee) since 1 January 2018? (single choice)

- Yes (please indicate the type of fee and year of introduction if possible)
- No
- Not sure/No answer

[If Q9 = "Unblended fee schedules"]

20. Did you experience the introduction of new card payment related fees (card scheme fee, acquiring fee, or other fee) since 1 January 2018? (single choice)

- a. card scheme fees (yes – indicate year of introduction, no, not sure)
- b. acquiring fees (yes – indicate year of introduction, no, not sure)
- c. other fee (yes – indicate year of introduction, no, not sure)

If Q20= yes, ask about the size of the fee for each new fee

%	New card scheme fee	New acquiring fee	New other fee
Consumer credit card			
Consumer debit card			
Commercial card			

[If Q17 = "Yes"]

21. To your knowledge, what were the reasons for new fees being introduced since 1 January 2018 (e.g. new services, increase in cost, other)? (open answer)

IV. Directly and indirectly card-related payments, incentives and rebates granted by card schemes and/or acquirers

In this section, we ask you to provide **annual data on the value of direct and indirect card related payments, bonuses and incentives**, including free consultancy hours/marketing and non-monetary ("Value in Kind" VIK) services, provided to you by card schemes and/or acquirers.

22. Has your company received any direct or indirect card-related payments, bonuses or incentives, including free consultancy hours, or discounts on scheme fees from (i) card schemes, and/or (ii) acquirers in the past 5 years?

- Yes, from card schemes only. Please specify.
- Yes, from acquirers only. Please specify.
- Yes, from both. Please specify.

- No.

23. Do you receive funds from card schemes in the context of Market Development Funds, Innovation Funds or an equivalent?

- Yes
- No
- Not sure
- If yes, please describe briefly their stated purpose, differentiating by Member State (if you are active in multiple Member States) and by scheme.

24. If yes, what are the annualised value of funds you receive from scheme Y in Member State X? (fields in blue are optional)

EUR	2018	2019	2020	2021	2022
MASTERCARD					
All Market Development Funds, Innovation Funds or equivalent (EUR)					
VISA					
All Market Development Funds, Innovation Funds or equivalent (EUR)					
DOMESTIC CARD SCHEME XY					
All Market Development Funds, Innovation Funds or equivalent (EUR)					

If you left some fields blank, please indicate the reason for not providing the data:

- The data is not available
- We could not provide the data due to a binding confidentiality agreement
- Other, please specify: _____

V. Choice of application at the POS terminal or in e-commerce

The following questions are related to payments with co-badged payment instruments, according the IFR (2015) defined as: the inclusion of two or more payment brands or payment applications of the same brand on the same card-based payment instrument. Examples: a plastic or virtual card (e.g. in a wallet) with the brand of a domestic and a international brand or branded with two payment categories (debit & credit). In some wallets the virtual equivalent of a co-badged card is loaded instead of two separate brands (or categories), visible to the wallet user, which are linked to the same card.

25. Do you have in place a priority selection which can be initiated by the merchant at the Point-of-interaction (physical terminal, e-commerce),

favouring a payment application for co-badged cards or other co-badged payment instruments?

- Yes, for the physical terminal only
- Yes, for the e-commerce POI only
- Yes, for both
- If yes, are you using this priority selection? (yes/no, please explain)
- No

26. Does your terminal offer your customers the possibility to choose a (different) payment application in case of co-badged cards (plastic or virtual) ? Please differentiate between transactions with card inserted and transactions using contactless.

Type of transaction	Choice of payment application offered
Card inserted in the terminal	Yes/No
Contactless cards	Yes/No
Mobile wallets	Yes/No

27. Does your check-out at your website offer your customers the possibility to choose a (different) payment application in case of co-badged cards (plastic and virtual)?

Type of instrument	Type of transaction	Choice of payment application offered
Co-badged plastic cards	e-commerce	Yes/No
Co-badged virtual cards (wallet)	e-commerce	Yes/No

28. If so, how do you inform consumers about the possibility to choose? Please tick all that apply

Type of transaction	On the POS terminal	merchant informs at the POS	On request by consumer at POS	Written notice at the POS (or online)	Drop down menu on website (check-out)	Other (please explain)
Card inserted in the terminal					n/a	
Contactless					n/a	
e-commerce						

How can the cardholder select which instrument, brand, or application they want to use for a particular transaction at a POS terminal/online payment acceptance solutions (e.g. are they explicitly asked to choose for each transaction)?			
• Card (contact)	Choice appears automatically	Yellow or other button to be pressed prior to making the transaction	Other, please specify (for instance verbal interaction with merchant)
• Contactless	Choice appears automatically (for instance two taps solution)	Yellow or other button to be pressed prior to making the transaction (one tap)	Other, please specify (for instance verbal interaction with merchant)
• E-commerce	Drop down menu of options (all brands and categories accepted)	One option and 'other' to choose another option	Other, please specify

29. Are there any technical or legal/contractual obstacles limiting your ability to make a priority selection (differentiate by use case: contact, contactless and online when relevant)?

- a. No there are not
- b. I am not interested in having a priority selection/not aware how to do this
- c. Lack of update of terminals
- d. Update of terminals too costly
- e. Current terminals do not support choice
- f. I cannot identify the brand and/or category of cards
- g. only one payment application/AID¹ is presented/sent to the terminal
- h. Other, please specify: _____

Please specify the impact of the obstacles(s), making the distinction between the use case (contact cards, contactless cards, e-commerce, mobile wallets) if relevant

30. Are there any technical or legal/contractual obstacles limiting your ability to offer a choice of payment application to consumers (including overriding the priority selection) (differentiate by use case: contact, contactless and online when relevant)?

- There are no technical or legal obstacles
- Lack of update of terminals
- Update of terminals too costly
- Current terminals do not offer choice
- Seamlessness given priority
- Payment gateway not offering the possibility of choice
- Other, please specify: _____

¹ AID: Application Identifier



Please specify the impact of the obstacles(s), making the distinction between the use case (contact cards, contactless cards, e-commerce, mobile wallets)

31. Are your customers using actively the payment application selection at the terminal and/or online in case of co-badged card-based instruments (plastic and virtual)? Could you please estimate the % of transactions where customers are actively selecting the application, differentiating by use case (contact, contactless, e-commerce)?

- Yes
 - Contact: %
 - Contactless: %
 - e-commerce %
- No

Annex 6 Sample frame of issuers and acquirers

I. ISSUERS

Issuer name	Country	Neo-bank (Yes/No)
Ceska Sporitelna Banka	CZ	No
Komerční banka (KB)	CZ	No
Raiffeisen Bank	CZ	No
Československá obchodní banka, a.s. (ČSOB)	CZ	No
UniCredit Bank	CZ	No
AIR BANK A.S.	CZ	No
BANKA CREDITAS A.S.	CZ	No
EQUA BANK A.S.	CZ	No
FIO BANKA A.S.	CZ	No
J&T BANKA	CZ	No
MONETA MONEY BANK, A.S.	CZ	No
PPF BANKA A.S.	CZ	No
Nuri (ex. Bitwala)	CZ	Yes
Vivid Money	CZ	Yes
CurrencyFair	CZ	Yes
Wirex	CZ	Yes
Bunq	CZ	Yes
Qapital	CZ	Yes
Anna MoneyBiz	CZ	Yes
Curve	CZ	Yes
Monese	CZ	Yes
Muniy	CZ	Yes
Revolut	CZ	Yes
SoldoBiz	CZ	Yes
Wise (Transferwise)	CZ	Yes
Go SoloBiz	CZ	Yes
Sogexia	CZ	Yes
Skrill	CZ	Yes
EverestcardBiz	CZ	Yes
COMDIRECT BANK AG	DE	No
COMMERZBANK	DE	No
DEUTSCHE BANK	DE	No
DEUTSCHE KREDITBANK AG	DE	No
LANDESBANK BERLIN AG	DE	No
Santander Consumer Bank	DE	No
TargoBank	DE	No
Postbank	DE	No
Barclays	DE	No
ING	DE	No
AXA BANK	DE	No
BANK 1 SAAR EG	DE	No
BAYERISCHE LANDESBANK	DE	No
BMW BANK GMBH	DE	No

Issuer name	Country	Neo-bank (Yes/No)
DEGUSSA BANK GMBH	DE	No
DEUTSCHER SPARKASSEN UND GIROVERBAND	DE	No
DIE SPARKASSE IN BREMEN	DE	No
DZ BANK AG	DE	No
EURO KARTENSYSTEME GMBH	DE	No
FIDOR BANK AG	DE	No
FRANKFURTER SPARKASSE	DE	No
FRANKFURTER VOLKSBANK EG	DE	No
HAMBURGER SPARKASSE	DE	No
HANSEATIC BANK GMBH AND CO KG	DE	No
LANDESBANK BADEN-WUERTTEMBERG	DE	No
LUFTHANSA AIRPLUS SERVICEKARTEN GMBH	DE	No
MAINZER VOLKSBANK EG	DE	No
MERCEDES-BENZ BANK AG	DE	No
N26 BANK	DE	No
NET-M PRIVATBANK 1891 AG	DE	No
NORDDEUTSCHE LANDESBANK GIROZENTRALE NORD LB	DE	No
NORISBANK AG	DE	No
OLDENBURGISCHE LANDESBANK AG	DE	No
PSD BANK KIEL	DE	No
SPARKASSE HEIDELB	DE	No
SPARKASSE KÖLNBONN	DE	No
SSK MAGDEBURG	DE	No
STADTSPARKASSE MUENCHEN	DE	No
TRIODOS BANK N.V.	DE	No
VERBAND DER SPARDA BANKEN E.V.	DE	No
VOLKSBANK FREIBURG EG	DE	No
VOLKSWAGENBANK	DE	No
WIRECARD	DE	No
WUESTENROT BANK AG PFANDBRIEBANK	DE	No
Nuri (ex. Bitwala)	DE	Yes
Vivid Money	DE	Yes
CurrencyFair	DE	Yes
Wirex	DE	Yes
Bunq	DE	Yes
N26	DE	Yes
FinomBiz	DE	Yes
HolviBiz	DE	Yes
Lydia	DE	Yes
Fidor Bank	DE	Yes
Insha	DE	Yes
KontistBiz	DE	Yes
PentaBiz	DE	Yes
Tomorrow	DE	Yes
Qapital	DE	Yes

Issuer name	Country	Neo-bank (Yes/No)
Anna MoneyBiz	DE	Yes
Curve	DE	Yes
Monese	DE	Yes
Muniy	DE	Yes
Revolut	DE	Yes
SoldoBiz	DE	Yes
Wise (Transferwise)	DE	Yes
Go SoloBiz	DE	Yes
Sogexia	DE	Yes
Skrill	DE	Yes
EverestcardBiz	DE	Yes
Yuh Bank	DE	Yes
Currensea	DE	Yes
JYSKE BANK	DK	No
NORDEA	DK	No
SEB Kort Denmark	DK	No
Danske Bank	DK	No
ARBEJDERNES LANDSBANK A/S	DK	No
DANSKE BANK	DK	No
EKSPRES BANK, A.S.	DK	No
NETS A/S	DK	No
NYKREDIT BANK A/S	DK	No
SANTANDER CONSUMER BANK	DK	No
SPAR NORD BANK A/S	DK	No
SYDBANK A/S	DK	No
RINGKJØBING LANDBOBANK. A/S	DK	No
Nuri (ex. Bitwala)	DK	Yes
Vivid Money	DK	Yes
CurrencyFair	DK	Yes
Wirex	DK	Yes
Bunq	DK	Yes
N26	DK	Yes
Lunar	DK	Yes
Qapital	DK	Yes
Anna MoneyBiz	DK	Yes
Curve	DK	Yes
Monese	DK	Yes
Muniy	DK	Yes
Revolut	DK	Yes
SoldoBiz	DK	Yes
Wise (Transferwise)	DK	Yes
Go SoloBiz	DK	Yes
Sogexia	DK	Yes
CREDIT MUTUEL	FR	No
Société Générale	FR	No

Issuer name	Country	Neo-bank (Yes/No)
CREDIT AGRICOLE	FR	No
BPCE	FR	No
BNP Paribas	FR	No
AUCHAN	FR	No
AXA BANQUE	FR	No
BANQUE CHABRIERES	FR	No
BANQUE DE SAVOIE	FR	No
BANQUE POPULAIRE	FR	No
BANQUE TRAVELEX S.A.	FR	No
CAISSE D'EPARGNE	FR	No
CARREFOUR	FR	No
CASINO BANQUE	FR	No
CREDIT DU NORD	FR	No
CREDIT LYONNAIS	FR	No
FORTUNEO BANQUE	FR	No
FRANFINANCE	FR	No
FRANSABANK FRANCE S.A.	FR	No
LA BANQUE POSTALE	FR	No
LCL BANQUE	FR	No
ONEY BANK	FR	No
ORANGE BANK	FR	No
SOCIETE GENERALE	FR	No
HSBC	FR	No
Credit Cooperatif Bank	FR	No
Nuri (ex. Bitwala)	FR	Yes
Vivid Money	FR	Yes
CurrencyFair	FR	Yes
Wirex	FR	Yes
Bunq	FR	Yes
N26	FR	Yes
AnytimeBiz	FR	Yes
BlankBiz	FR	Yes
Helios	FR	Yes
Hello bank!	FR	Yes
KardTeens	FR	Yes
Ma French Bank	FR	Yes
manager.oneBiz	FR	Yes
Nickel	FR	Yes
Noelse	FR	Yes
OnlyOne	FR	Yes
Orange Bank	FR	Yes
PCS	FR	Yes
PixpayTeens	FR	Yes
PrismaBiz	FR	Yes
QontoBiz	FR	Yes

Issuer name	Country	Neo-bank (Yes/No)
ShineBiz	FR	Yes
VybeTeens	FR	Yes
XaalyTeens	FR	Yes
FinomBiz	FR	Yes
HolviBiz	FR	Yes
Lydia	FR	Yes
Qapital	FR	Yes
Anna MoneyBiz	FR	Yes
Curve	FR	Yes
Monese	FR	Yes
Muniy	FR	Yes
Revolut	FR	Yes
SoldoBiz	FR	Yes
Wise (Transferwise)	FR	Yes
Go SoloBiz	FR	Yes
Sogexia	FR	Yes
Skrill	FR	Yes
EverestcardBiz	FR	Yes
Carte Zero	FR	Yes
Yuh Bank	FR	Yes
Currensea	FR	Yes
NATIONAL BANK OF GREECE, S.A.	GR	No
ALPHA BANK	GR	No
EUROBANK EFG	GR	No
PIRAEUS BANK S.A.	GR	No
Aegean Baltic Bank	GR	No
ATTICA BANK, S.A.	GR	No
COOPERATIVE BANK OF CENTRAL MACEDONIA	GR	No
COOPERATIVE BANK OF CHANIA	GR	No
HELLENIC BANK	GR	No
HSBC Continental Europe, Greece	GR	No
Olympus Bank	GR	No
Optima Bank	GR	No
PANCRETA BANK	GR	No
ProCredit Bank	GR	No
Nuri (ex. Bitwala)	GR	Yes
Vivid Money	GR	Yes
CurrencyFair	GR	Yes
Wirex	GR	Yes
Bunq	GR	Yes
N26	GR	Yes
Tomorrow	GR	Yes
Qapital	GR	Yes
Anna MoneyBiz	GR	Yes
Curve	GR	Yes

Issuer name	Country	Neo-bank (Yes/No)
Monese	GR	Yes
Muniy	GR	Yes
Revolut	GR	Yes
SoldoBiz	GR	Yes
Wise (Transferwise)	GR	Yes
Go SoloBiz	GR	Yes
Sogexia	GR	Yes
Skrill	GR	Yes
ALLIED IRISH BANKS, P.L.C.	IE	No
BANK OF IRELAND	IE	No
ULSTER BANK (took over by Permanent TSB January 2023)	IE	No
BUNQ	IE	No
KLARNA BANK	IE	No
AVANTCARD, LTD.	IE	No
EBS BUILDING SOCIETY	IE	No
FIRST DIRECT	IE	No
PERMANENT TSB	IE	No
ULSTER BANK	IE	No
Nuri (ex. Bitwala)	IE	Yes
Vivid Money	IE	Yes
CurrencyFair	IE	Yes
Wirex	IE	Yes
Bunq	IE	Yes
N26	IE	Yes
HolviBiz	IE	Yes
Lydia	IE	Yes
Tomorrow	IE	Yes
FireBiz	IE	Yes
Qapital	IE	Yes
Anna MoneyBiz	IE	Yes
Curve	IE	Yes
Monese	IE	Yes
Muniy	IE	Yes
Revolut	IE	Yes
SoldoBiz	IE	Yes
Wise (Transferwise)	IE	Yes
Go SoloBiz	IE	Yes
Sogexia	IE	Yes
Currensea	IE	Yes
BANCOPOSTA	IT	No
INTESA SANPAOLO	IT	No
Monte Dei Paschi Di Sienna	IT	No
NEXI S.P.A.	IT	No
UNICREDIT	IT	No
AGOS DUCATO SPA	IT	No

Issuer name	Country	Neo-bank (Yes/No)
BANCA DI SASSARI S.P.A.	IT	No
BANCA MEDIOLANUM	IT	No
BANCA MONTE DEI PASCHI DI SIENA	IT	No
BANCA POPOLARE DI MILANO SPA	IT	No
BANCA SELLA SPA	IT	No
BANCA WIDIBA SPA	IT	No
BPER Banca	IT	No
CASSA CENTRALE BANCA - CREDITO COOPERATIVO DEL NORD EST SPA	IT	No
CHEBANCA! SPA	IT	No
CREDEM	IT	No
FIDITALIA S.P.A.	IT	No
FINDOMESTIC BANCA SPA	IT	No
FINECOBANK S.P.A.	IT	No
GRUPPO MEDIOBANCA (COMPASS)	IT	No
ICCREA BANCA S.P.A.	IT	No
POSTE ITALIANE	IT	No
Banco BPM Group	IT	No
Nuri (ex. Bitwala)	IT	Yes
Vivid Money	IT	Yes
CurrencyFair	IT	Yes
Wirex	IT	Yes
Bunq	IT	Yes
N26	IT	Yes
FinomBiz	IT	Yes
HolviBiz	IT	Yes
Lydia	IT	Yes
Tomorrow	IT	Yes
BuddyBank	IT	Yes
Fineco Bank	IT	Yes
Hype	IT	Yes
Qapital	IT	Yes
Anna MoneyBiz	IT	Yes
Curve	IT	Yes
Monese	IT	Yes
Muniy	IT	Yes
Revolut	IT	Yes
SoldoBiz	IT	Yes
Wise (Transferwise)	IT	Yes
Go SoloBiz	IT	Yes
Sogexia	IT	Yes
Skrill	IT	Yes
EverestcardBiz	IT	Yes
Yuh Bank	IT	Yes
Currensea	IT	Yes
Luminor Bank	LT	No

Issuer name	Country	Neo-bank (Yes/No)
Swedbank	LT	No
AB SEB bankas	LT	No
CITADELE BANKAS AB	LT	No
SILAULIU BANKAS	LT	No
Nuri (ex. Bitwala)	LT	Yes
Vivid Money	LT	Yes
CurrencyFair	LT	Yes
Wirex	LT	Yes
Bunq	LT	Yes
Tomorrow	LT	Yes
Valyuz	LT	Yes
Qapital	LT	Yes
Anna MoneyBiz	LT	Yes
Curve	LT	Yes
Monese	LT	Yes
Muniy	LT	Yes
Revolut	LT	Yes
SoldoBiz	LT	Yes
Wise (Transferwise)	LT	Yes
Go SoloBiz	LT	Yes
Sogexia	LT	Yes
ING GROEP N.V.	NL	No
ABN AMRO	NL	No
RABOBANK	NL	No
ASN BANK	NL	No
Bunq	NL	No
DE VOLKSBANK N.V.	NL	No
GWK BANK, N.V.	NL	No
Knab	NL	No
NATIONALE-NEDERLANDEN BANK	NL	No
QANDER CONSUMER FINANCE	NL	No
SNS BANK, N.V.	NL	No
Van LANSCHOT BANKIERS	NL	No
Nuri (ex. Bitwala)	NL	Yes
Vivid Money	NL	Yes
CurrencyFair	NL	Yes
Wirex	NL	Yes
Bunq	NL	Yes
N26	NL	Yes
FinomBiz	NL	Yes
HolviBiz	NL	Yes
Tomorrow	NL	Yes
Knab	NL	Yes
Qapital	NL	Yes
Anna MoneyBiz	NL	Yes

Issuer name	Country	Neo-bank (Yes/No)
Curve	NL	Yes
Monese	NL	Yes
Muniy	NL	Yes
Revolut	NL	Yes
SoldoBiz	NL	Yes
Wise (Transferwise)	NL	Yes
Go SoloBiz	NL	Yes
Sogexia	NL	Yes
EverestcardBiz	NL	Yes
Currensea	NL	Yes
Gimi	NL	Yes
Bank Pekao	PL	No
ING Bank Śląski	PL	No
PKO BANK POLSKI S.A.	PL	No
mBank	PL	No
Santander Bank Polska	PL	No
AION Bank	PL	No
ALIOR BANK S.A.	PL	No
BANK BPH S.A.	PL	No
Bank BPS	PL	No
BANK MILLENNIUM S.A.	PL	No
Bank Nowy BFG	PL	No
BANK POCZTOWY S.A.	PL	No
BANK POLSKA KASA OPIEKI S.A. (BANK PEKAO SA)	PL	No
BOS Bank	PL	No
BRE BANK S.A.	PL	No
Citibank Handlowy	PL	No
Credit Agricole Bank Polska	PL	No
Danske Bank A/S S.A. Oddział w Polsce	PL	No
GETIN NOBLE BANK S.A.	PL	No
HSBC Continental Europe (Spółka Akcyjna) Oddział w Polsce	PL	No
Ikano Bank	PL	No
KREDYT BANK, S.A.	PL	No
MBANK, S.A.	PL	No
NEST BANK, S.A.	PL	No
PLUS BANK	PL	No
RAIFFEISEN BANK POLSKA, S.A.	PL	No
Santander Bank Polska S.A.	PL	No
Santander Consumer Bank S.A.	PL	No
SGB-BANK S.A.	PL	No
SYGMA BANQUE SOCIETE ANONYME ODDZIAL W POLSCE	PL	No
Nuri (ex. Bitwala)	PL	Yes
Vivid Money	PL	Yes
CurrencyFair	PL	Yes

Issuer name	Country	Neo-bank (Yes/No)
Wirex	PL	Yes
Bunq	PL	Yes
N26	PL	Yes
mBank	PL	Yes
Nest Bank	PL	Yes
Qapital	PL	Yes
Anna MoneyBiz	PL	Yes
Curve	PL	Yes
Monese	PL	Yes
Muniy	PL	Yes
Revolut	PL	Yes
SoldoBiz	PL	Yes
Wise (Transferwise)	PL	Yes
Go SoloBiz	PL	Yes
Sogexia	PL	Yes
Skrill	PL	Yes
BANCO BPI	PT	No
Banco Santander Totta	PT	No
Millenium bcp	PT	No
NOVO BANCO S.A.	PT	No
CAIXA GERAL DE DEPOSITOS SA	PT	No
Abanca Corporación Bancaria	PT	No
AGIBANK	PT	No
Banco ActivoBank	PT	No
Banco Atlântico Europa	PT	No
BANCO BILBAO VIZCAYA ARGENTARIA S.A. (BBVA)	PT	No
BANCO BRADESCO EUROPA	PT	No
BANCO COMERCIAL PORTUGUÊS	PT	No
BANCO DE INVESTIMENTO GLOBAL SA	PT	No
BANCO ESPIRITO SANTO DOS ACORES, S.A.	PT	No
BANCO INTERNACIONAL DO FUNCHAL S.A. (BANIF)	PT	No
Banco Montepio	PT	No
BANCO ORIGINAL	PT	No
Banco Português de Gestão	PT	No
BANCO PRIVADO ATLANTICO EUROPA S.A.	PT	No
BANCO VOTARANTIM	PT	No
BCP BANCO COMERCIAL PORTUGUES, SA	PT	No
Caixa Central de Crédito Agrícola Mútuo	PT	No
Nuri (ex. Bitwala)	PT	Yes
Vivid Money	PT	Yes
CurrencyFair	PT	Yes
Wirex	PT	Yes
Bunq	PT	Yes
N26	PT	Yes
Lydia	PT	Yes

Issuer name	Country	Neo-bank (Yes/No)
Tomorrow	PT	Yes
Qapital	PT	Yes
Anna MoneyBiz	PT	Yes
Curve	PT	Yes
Monese	PT	Yes
Muniy	PT	Yes
Revolut	PT	Yes
SoldoBiz	PT	Yes
Wise (Transferwise)	PT	Yes
Go SoloBiz	PT	Yes
Sogexia	PT	Yes
Skrill	PT	Yes
EverestcardBiz	PT	Yes
SVENSKA HANDELSBANKEN	SE	No
ENTERCARD SVERIGE AB	SE	No
NORDEA	SE	No
SKANDINAVISKA ENSKILDA BANKEN AB (SEB)	SE	No
SWEDBANK	SE	No
COLLECTOR BANK AB	SE	No
COOP BANK AB	SE	No
Danske Bank	SE	No
FOREX BANK AB	SE	No
HSBC	SE	No
ICA BANKEN AB	SE	No
IKANO BANK (IKEA)	SE	No
Klarna Bank AB	SE	No
LANSFORSÅKRINGAR BANK AB	SE	No
MARGINALEN BANK BANKAKTIEBOLAG	SE	No
MEDMERA BANK AB	SE	No
RESURS BANK AB	SE	No
SKANDIABANKEN	SE	No
SPARBANKEN ORESUND AB	SE	No
VOLVOFINANS BANK AB (PUBL)	SE	No
WASA KREDIT	SE	No
Nuri (ex. Bitwala)	SE	Yes
Vivid Money	SE	Yes
CurrencyFair	SE	Yes
Wirex	SE	Yes
Bunq	SE	Yes
N26	SE	Yes
Qapital	SE	Yes
Anna MoneyBiz	SE	Yes
Curve	SE	Yes
Monese	SE	Yes
Muniy	SE	Yes

Issuer name	Country	Neo-bank (Yes/No)
Revolut	SE	Yes
SoldoBiz	SE	Yes
Wise (Transferwise)	SE	Yes
Go SoloBiz	SE	Yes
Sogexia	SE	Yes
EverestcardBiz	SE	Yes
Gimi	SE	Yes
P.F.C.	SE	Yes

II. ACQUIRERS

Acquirer name	Country	Neo-bank (Yes/No)
Fio Banka	CZ	No
Revo (EVO)	CZ	No
Global Payments	CZ	No
Československá obchodní banka, a.s. (ČSOB)	CZ	No
UniCredit Bank	CZ	No
Worldline	CZ	No
Ceska sporitelna (CS)	CZ	No
KB Smart Bank	CZ	No
Moneta Platbni Sluzby	CZ	No
Advance Telecom Services, s.r.o	CZ	Yes
ComGate Payments, a.s.	CZ	Yes
GOPAY s.r.o	CZ	Yes
Materna Communications a.s.	CZ	Yes
Mercurius Partners s.r.o.	CZ	Yes
MewsSystems	CZ	Yes
ThePay CZ, S.R.O.	CZ	Yes
CentralPay	CZ	Yes
BS Payone GmbH	DE	No
ConCardis GmbH	DE	No
EVO Payments International	DE	No
First Data Europe (Fiserv)	DE	No
Elavon Inc	DE	No
VR Payment GmbH	DE	No
DZ Bank	DE	No
First Cash Solutions (1cs)	DE	No
Verifone GmbH	DE	No
Citibank Europe plc	DE	No
Adyen	DE	No
TeleCash (by Fiserv)	DE	No
Intercard, Inc. (by Verifone)	DE	No

Acquirer name	Country	Neo-bank (Yes/No)
SIA (Nexi Group)	DE	No
Apaleo GmbH	DE	Yes
Computop Finance GmbH	DE	Yes
Deutsche Bank AG	DE	Yes
eClear Aktiengesellschaft	DE	Yes
Novalnet AG	DE	Yes
Secupay AG	DE	Yes
ARGO PAYMENT SERVICES S.A. PAYMENT INSTITUTION	DE	Yes
SEB Kort Denmark	DK	No
Teller (Nets)	DK	No
Danske Bank	DK	No
Nordea Bank	DK	No
Elavon Inc	DK	No
Citibank Europe plc	DK	No
Worldline	DK	No
Clerhaus	DK	No
Svenska Handelsbanken AB	DK	No
N26 (Number 26)	DK	No
Swedbank	DK	No
JP Morgan Payments	DK	No
CREDIT MUTUEL	FR	No
Société Générale	FR	No
Crédit Agricole Payment Services	FR	No
BPCE	FR	No
BNP Paribas	FR	No
Banque Palatine	FR	No
BNP Paribas Fortis	FR	No
Carrefour Banque	FR	No
CIC Group	FR	No
Crédit du Nord	FR	No
Crédit Mutuel	FR	No
Ingenico Financial Payment Services	FR	No
La Banque Postale	FR	No
LCL Crédit Lyonnais	FR	No
Mercury Payment Services	FR	No
Worldline	FR	No
Group BPCE	FR	No
HSBC	FR	No
FLOWBIRD SAS	FR	Yes
HIPAY SAS	FR	Yes
ILIAD 78	FR	Yes
Lemon Way	FR	Yes
Market Pay	FR	Yes
Paygreen	FR	Yes

Acquirer name	Country	Neo-bank (Yes/No)
PAYPLUG	FR	Yes
Paytweak SAS	FR	Yes
SFPMEI	FR	Yes
Smile and Pay	FR	Yes
U Etablissement de Paiement	FR	Yes
ACI Worldwide (Germany) GmbH	FR	Yes
NATIONAL BANK OF GREECE, S.A.	GR	No
Epay	GR	No
Worldline Greece	GR	No
Nexi Greece Processing Services	GR	No
Alpha Bank	GR	No
Attica Bank	GR	No
Eurobank Ergasias	GR	No
National Bank of Greece (NBG)	GR	No
Piraeus Bank	GR	No
Cardlink Payment Institution S.A	GR	Yes
EURONET CARD SERVICES S.A.	GR	Yes
Everyday Payment Services SA	GR	Yes
Mellon Technologies	GR	Yes
Viva Payments S.A.	GR	Yes
Bluesnap Payment Services Ireland Limited	GR	Yes
Elavon	IE	No
AIB Merchant Services (AIMBS)	IE	No
BOI PAYMENT ACCEPTANCE	IE	No
FIS WorldPay	IE	No
Affiniture Cards	IE	No
Chase Paymentech Europe Ltd.	IE	No
EVO Payments International	IE	No
Rapyd	IE	No
Global payments	IE	No
Digital River Ireland Limited	IE	Yes
First Merchant Processing (Ireland) Ltd	IE	Yes
HIPS Payment Group Ltd	IE	Yes
Paysafe Payment Solutions Limited	IE	Yes
PAYTABS PAYMENT GATEWAY LIMITED	IE	Yes
Segregated Payments (Ireland) Ltd.	IE	Yes
SQUAREUP INTERNATIONAL LIMITED	IE	Yes
Sumup Ltd	IE	Yes
Yapstone International Limited	IE	Yes
A-Tono Payment Institute SpA	IE	Yes
NEXI S.P.A.	IT	No
UniCredit	IT	No
Worldline	IT	No
Banca Sella	IT	No

Acquirer name	Country	Neo-bank (Yes/No)
Banco BPM	IT	No
BancoPosta	IT	No
BNL POSitivity	IT	No
Iccrea Banca	IT	No
Intesa Sanpaolo	IT	No
Nexi Payments S.p.A	IT	No
Fiserv	IT	No
BancoDesio	IT	No
Adyen	IT	No
Credit Agricole	IT	No
Axerve Spa	IT	Yes
CityPoste Payment S p.A.	IT	Yes
Edenred Italia Fin Srl	IT	Yes
Fnmpay S.p.a	IT	Yes
MONDIAL BONY SERVICE SPA	IT	Yes
Money.net S.p.A	IT	Yes
SE.PA.FIN. SPA	IT	Yes
SISALPAY S.P.A.	IT	Yes
CONNECTPAY UAB	IT	Yes
Swedbank	LT	No
CITADELE BANKAS AB	LT	No
AB SEB bankas	LT	No
Luminor Bank	LT	No
Siauliu Bankas	LT	No
NETS (Nexi Group)	LT	No
Foxpay UAB	LT	Yes
Kevin EU UAB	LT	Yes
Maneuver Lt UAB	LT	Yes
Nayax EU UAB	LT	Yes
Paydoo Payments UAB	LT	Yes
PaySera Lt UAB	LT	Yes
Revolut Bank UAB	LT	Yes
SumUp EU Payments UAB	LT	Yes
TBF Finance, UAB	LT	Yes
UAB Click2sell	LT	Yes
UAB Glocash Payment	LT	Yes
About Payments	LT	Yes
ING GROEP N.V.	NL	No
ABN AMRO	NL	No
RABOBANK	NL	No
Worldline	NL	No
Adyen N.V.	NL	No
Bank Nederlandshe (BNG Bank N.V.)	NL	No
Deutsche Bank	NL	No

Acquirer name	Country	Neo-bank (Yes/No)
European Merchant Services	NL	No
Nederlandse Waterschapsbank	NL	No
Pay NL	NL	No
SIA (Nexi Group)	NL	No
Worldpay	NL	No
Elavon	NL	No
Airwallex Netherlands BV	NL	Yes
Avangate BV	NL	Yes
Bitsafe B.V.	NL	Yes
Bitsafe Payments B.V.	NL	Yes
Brainpoint Betaalsystemen BV	NL	Yes
Buckaroo B.V.	NL	Yes
CCV Group B.V.	NL	Yes
CM Payments B. V.	NL	Yes
Curo Payments BV	NL	Yes
Cyber & Mason Holding B.V.	NL	Yes
Docdata	NL	Yes
GLOBAL COLLECT SERVICES BV.	NL	Yes
Icepays	NL	Yes
Ingenico Payment Services / Ogone / B2U	NL	Yes
Leza Efficiency B.V.	NL	Yes
Lightspeed Netherlands B.V.	NL	Yes
Loc Pay Systems B.V.	NL	Yes
Lubee Pinverhuur BV	NL	Yes
Mollie B.V.	NL	Yes
Moneylogistics B.V.	NL	Yes
MultiSafepay	NL	Yes
PayPro	NL	Yes
PinTip v.o.f.	NL	Yes
Procent	NL	Yes
Rent A Pin BV	NL	Yes
Sepay B.V.	NL	Yes
Sisow	NL	Yes
Statna Pokladnica	NL	Yes
Stichting Escrow Ice Pay	NL	Yes
TargetPay	NL	Yes
Taxa-Meter Centrale BV	NL	Yes
TinTel B.V.	NL	Yes
TSG Payments NDL B.V	NL	Yes
LLC Cointer	NL	Yes
Bank Pekao	PL	No
Elavon	PL	No
eService by EVO	PL	No
Polcard by Fiserv	PL	No

Acquirer name	Country	Neo-bank (Yes/No)
Santander Bank Polska	PL	No
Alior Bank	PL	No
Bank BPH	PL	No
Bank Zachodni WBK	PL	No
Paytel - mBank	PL	No
PayU S.A.	PL	No
pep Polski ePlatnosci	PL	No
Adyen	PL	No
SIA (Nexi Group)	PL	No
Blue Media S.A.	PL	Yes
BNP Paribas Bank Polska S.A.	PL	Yes
DOTPAY SP Z O O	PL	Yes
ECARD S.A.	PL	Yes
IAI sp. z o.o.	PL	Yes
IDOPAYMENTS SP. Z O. O.	PL	Yes
ING Bank Slaski S.A.	PL	Yes
Paylane SP Z.O.O.	PL	Yes
PayPro Spolka Akcyjna	PL	Yes
PayU Spolka Akcyjna	PL	Yes
Altice Pay, S.A.	PL	Yes
BANCO BPI	PT	No
Millenium bcp	PT	No
NOVO BANCO S.A.	PT	No
CAIXA GERAL DE DEPOSITOS SA	PT	No
BancoBIC	PT	No
Unicre	PT	No
BancoBIC / (Net Pay)	PT	No
Caixa Económica Montepio Geral	PT	No
CGD netcaixa	PT	No
Euronet 360 Finance Ltd.	PT	No
Millenium bpc	PT	No
Novo Banco	PT	No
EASYPAY - SISTEMAS DE PAGAMENTO E MARKETING	PT	Yes
EUPAGO - INSTITUICAO DE PAGAMENTO, LDA	PT	Yes
Ifthenpay LDA	PT	Yes
Pagaqui - Pagamentos e Carregamentos S.A.	PT	Yes
PAYSHOP (PORTUGAL), S.A.	PT	Yes
Collector Bank AB	PT	Yes
SVENSKA HANDELSBANKEN	SE	No
SWEDBANK	SE	No
Bambora now is Worldline	SE	No
Nets (Part of Nexi Group)	SE	No

Acquirer name	Country	Neo-bank (Yes/No)
Sparbanken Öresund	SE	No
Elavon	SE	No
Nets (Nexi Group)	SE	No
Nordea	SE	No
Klarna + Worldpay	SE	No
DIBS PAYMENT SERVICES AB (PUBL.)	SE	Yes
Direct2Internet Nordic AB	SE	Yes
LEOGAMING PAY FC,LLC	SE	Yes
Loomis Digital Solutions AB	SE	Yes
Marginalen Bank Bankaktiebolag	SE	Yes
Northmill Bank AB	SE	Yes
Payer Financial Services AB	SE	Yes
Payson AB	SE	Yes
paystree Ltd	SE	Yes
Surfboard Payments AB	SE	Yes
Svea Ekonomi AB	SE	Yes
Youcal AB	SE	Yes



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