

Question ID	2019_4800
Status	Final Q&A
Legal act	Directive 2015/2366/EU (PSD2)
Topic	Strong customer authentication and common and secure communication (incl. access)
Article	97
Paragraph	-
Subparagraph	-
COM Delegated or Implementing Acts/RTS/ITS/GLs/Recommendations	Regulation (EU) 2018/389 - RTS on strong customer authentication and secure communication
Article/Paragraph	1
Date of submission	19/06/2019
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Disclose name of institution / entity	No
Type of submitter	Industry association
Subject matter	Whitelisting
Question	Will a clearing house for distribution be enabled to facilitate the on-going maintenance of the whitelisting process?
Background on the question	Intermediaries (Online Travel Agencies (OTAs), Brands, and Global distribution Systems (GDS)) are able to document their brands and group structures for whitelisting. The process of whitelisting each brand, location, or merchant places an undue burden on consumers to have all the information necessary to accurately complete the whitelisting process.
EBA answer	<p>Article 13(1) of the Commission Delegated Regulation (EU) 2018/389 sets out that a payer can create or amend a list of trusted beneficiaries only through its account servicing payment service provider (ASPSP). Therefore, the creation or amendment of a trusted beneficiary list through an intermediary does not meet the requirements in Article 13(1) of the Commission Delegated Regulation.</p> <p>However, this does not preclude ASPSPs from outsourcing the management of the trusted beneficiaries list to a third party, subject to</p>

	compliance with the general requirements on outsourcing and the EBA Guidelines on Outsourcing arrangements (EBA/GL/2019/02) .
Link	https://eba.europa.eu/single-rule-book-qa/-/qna/view/publicId/2019_4800

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