

Single Rulebook Q&A

Question ID	2019_4776
Status	Final Q&A
Legal act	Directive 2015/2366/EU (PSD2)
Topic	Strong customer authentication and common and secure communication (incl. access)
Article	Article 5
Paragraph	-
Subparagraph	-
COM Delegated or Implementing Acts/RTS/ITS/GLs/Recommendations	Not applicable
Article/Paragraph	Article 5
Date of submission	13/06/2019
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Disclose name of institution / entity	No
Type of submitter	Competent authority
Subject matter	More than one transaction from a single consumer initiated transaction
Question	When a consumer elects to add an additional item to their purchase at the time of checkout (a cross sale) they are making two purchases from two different merchants in a single session. Is SCA required for both of these transactions? This would make the user experience very clumsy and awkward as the consumer would have to go through SCA twice in a row during a single checkout.
Background on the question	Article 5 Dynamic linking 1. Where payment service providers apply strong customer authentication in accordance with Article 97(2) of Directive (EU) 2015/2366, in addition to the requirements of Article 4 of this Regulation, they shall also adopt security measures that meet each of the following requirements: (a) the payer is made aware of the amount of the payment transaction and of the payee; (b) the authentication code generated is specific to the amount of the payment transaction and the payee agreed to by the payer when initiating the transaction; (c) the authentication code accepted by the payment service provider corresponds to the original specific amount of the payment transaction and to the identity of the payee agreed to by the payer; (d) any change to the amount or the payee results in

	the invalidation of the authentication code generated.
Final answer	<p>According to Article 97(1), point (b), of Directive 2015/2366/EU (PSD2), payment service providers shall apply strong customer authentication (SCA) where the payer initiates an electronic payment transaction.</p> <p>In case of a so-called ‘cross-sale’ as described by the submitter, if a payer is requested to initiate two separate payment transactions, then two SCAs are required. If the second purchase would qualify as a merchant initiated transaction (MIT) SCA would be required to set up the mandate for the MIT.</p> <p>The scenario described by the submitter does not explicitly specify whether there are two distinct purchasing acts or two purchases that fall in the same basket. In the case of a single basket resulting in a batch payment “the authentication code shall be specific to the total amount of the batch of payment transactions and to the specified payees” (Article 5(3), point (b), of Commission Delegated Regulation (EU) 2018/389, RTS on SCA and CSC).</p> <p>Please refer to Q&A 2018_4415 for a more detailed information on dynamic linking for batch transactions</p> <p>Disclaimer:</p> <p>The answers clarify provisions already contained in the applicable legislation. They do not extend in any way the rights and obligations deriving from such legislation nor do they introduce any additional requirements for the concerned operators and competent authorities. The answers are merely intended to assist natural or legal persons, including competent authorities and Union institutions and bodies in clarifying the application or implementation of the relevant legal provisions. Only the Court of Justice of the European Union is competent to authoritatively interpret Union law. The views expressed in the internal Commission Decision cannot prejudice the position that the European Commission might take before the Union and national courts.</p>
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