

✘ Single Rulebook Q&A

Question ID	2018_4235
Status	Final Q&A
Legal act	Directive 2015/2366/EU (PSD2)
Topic	Strong customer authentication and common and secure communication (incl. access)
Article	98
Paragraph	1
Subparagraph	(a)
COM Delegated or Implementing Acts/RTS/ITS/GLs/Recommendations	Regulation (EU) 2018/389 - RTS on strong customer authentication and secure communication
Article/Paragraph	7
Date of submission	06/09/2018
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Disclose name of institution / entity	Yes
Name of institution / submitter	Swedish Bankers' Association
Country of incorporation / residence	Sweden
Type of submitter	Industry association
Subject matter	Ability of static card data to be considered a possession factor?
Question	Can static card data (Card number PAN + cardholder name +Exp. Date + static CVV2/CVC2) be considered a as a possession factor, and if so: is it strong enough to be a valid factor in a 2-factor Strong customer authentication (SCA)?
Background on the question	In its Opinion on the implementation of the RTS on SCA and CSC (EBA-Op-2018-04), the EBA explained that simple card data (Card number PAN + cardholder name +Exp. Date + CVV2/CVC2) cannot be considered a knowledge element. However, many would consider this data to rather be an element of possession, as also the physical card is an element of possession. The CVV2/CVC2 was originally introduced to establish that the actual physical card had at some point in time been involved in the initiation of the card-based payment – e.g. that it is not just a computer-generated card number under an issuer BIN.
EBA answer	

	<p>Article 4(30) of Directive 2015/2366/EU (PSD2) defines 'possession' as "something only the user possesses".</p> <p>Paragraph 28 and Table 2 of the EBA Opinion on the elements of strong customer authentication under PSD2 (EBA-Op-2019-06) clarified that card details and card security code that are printed on the card cannot constitute a valid possession element for the approaches currently observed on the market since the requirements of Article 7 of the Commission Delegated Regulation (EU) 2018/389 would not be met.</p>
Link	https://www.eba.europa.eu/single-rule-book-qa/-/qna/view/publicId/2018_4235

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