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Finantsinspeksioon has highlighted that any company that offers its clients client loyalty cards, fuel cards, membership cards, public transport cards, account-based payment options and other personalised and restricted means of payment for use in its premises, in a restricted network or for purchasing only some services and products may bear the obligation to inform Finantsinspeksioon of its activities. The duty to report applies to companies that have had total payment transactions of more than one million euros in the previous 12 months.

If the permanent business activity of the company is providing payment services, it must apply to Finantsinspeksioon for an operating authorisation as a payment institution. Companies whose clients can pay in restricted ways using personalised means of payments as listed above do not need an authorisation as a payment institution, but they need to inform Finantsinspeksioon about their activities under certain conditions.

Fuel companies need to inform Finantsinspeksioon about their activities for example if their clients can pay for fuel using a client card and if the total payments by clients using fuel cards exceed one million euros in 12 months. Shops also need to inform Finantsinspeksioon about their activities if payments made in their shops using client cards exceed one million euros in a year.

The obligation to inform for these service providers is regulated by the Payment Institutions and E-money Institutions Act § 41 (1). More details on the requirements are given in the guidelines of the European Banking Authority.

See further information on the obligation to report [here](#).

[The European Banking Authority guideline on exclusion from limited networks under the Second Payment Services Directive](#)