Module F — Third parties, supplier responsibility and disputes

Editorial implementation aid; suggested owners and metrics are not statutory role titles or mandated KPIs.

Decisions

• Define account-servicing and initiation-provider evidence handoffs.

• Map authentication support contracts to proportionate supplier recovery.

• Approve country-specific complaint, ADR and authority escalation routes.

Risks

• Supplier disputes can delay separate customer remedies.

• Payment schemes and payment systems can be wrongly treated as interchangeable.

• Complaint extensions can be mistaken for refund-clock extensions.

Dates and triggers

• Article 59 states no separate numerical claim deadline; apply actual contract and relevant law.

• Article 104(2): reply within 15 business days; conditional exceptional final response within 35.

• Article 105 sets no uniform numerical ADR case-resolution deadline.

Accountable owners

• Third-party risk head: supplier contracts and dependencies.

• Payments operations head: initiation-service evidence and recourse.

• Complaints head: internal replies, ADR and supervisory routing.

Measures

• Share of critical authentication services with mapped contractual duties and evidence access.

• Share of internal complaints answered within the applicable reply clock.

• Number of ADR handoffs rejected for missing evidence or wrong jurisdiction.

Council 8543/1/26 REV 1, 4 November 2026. Checked 2026-11-19. Article 59, unnumbered provision; Article 80(1), (2); Article 100(1)–(3); Article 104(1)–(4); Article 105(1)–(7)

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