



beyond
payment

Ingenico Comments on the Eurosystem Consultation document

“RECOMMENDATIONS FOR THE SECURITY OF INTERNET PAYMENTS”

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Introduction

Ingenico as a key player in the European card payment industry is strongly supporting all standardization initiatives related to the security of retail payments in every payment context. An integrated European electronic payment market is considered as the natural next step following the achievement of the single market for goods and services and a necessary complement to the introduction of euro banknotes and coins. Increased efficiency in payments security, including common approach among the SEPA countries driven by the payment industry itself or the overseers and supervisors of the security of the retail payments would help all stakeholders to free up time and investments to bring more value to their respective customers instead of complying with local constraints and operate in a fragmented market.

Thus, Ingenico welcomes the Eurosystem's initiative to launch a public consultation about its "Recommendations for the Security of Internet payments."

Ingenico is the leader payment solutions provider in Europe, with over 4 million terminals deployed in the SEPA area. Its 1100 employees and its direct and indirect presence in 27 European countries support retailers, banks and service providers to optimize and secure their electronic payments solutions, develop their offer of services and increase their point of sales revenue.

We are convinced about the huge potential in the internet payment and our company is willing to offer to its customers a cross-channel payment solution with best suited security. Therefore we are pleased to participate in this consultation process.

You will find below some generic comments on the document and will also find attached an EXCEL file with our detailed comments in respects to the Eurosystem Key Considerations and Best Practices proposal.

Generic comments

This document is a very complete view on the key concepts to be considered to implement a best suited framework for the security of the internet payment in Europe.

1) Eurosystem recommendations vs. PCI DSS

In the document we can find some principles which are already incorporated in worldwide standards for remote payment, mainly PCI DSS.

Ingenico questions

- Could the differences between the PCI DSS standard and the Eurosystem key considerations and best practices be highlighted?
- If the PCI DSS standards is viewed by the Eurosystem as complementary to its recommendations?

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- Does the Eurosystem wish to supersede the PCI DSS standards for internet payments and does this mean that the current document will be followed by more detailed requirements set?

2) Eurosystem expected security harmonization level

As mentioned in the document: “The ultimate aim is to foster the establishment of a harmonized EU/ EEA-wide minimum level of security, as well as to facilitate a common understanding between the relevant authorities”

Ingenico question

- How the Eurosystem foresees the efficiency of the internet payments in Europe by harmonization at minimum level, meaning the possibility for the member –States to set-up requirements beyond that?

3) The implementation date and the monitoring of the effectiveness of the compliance?

“The recommendations outlined in this report should be implemented by PSPs and card payment schemes by 1 July 2014”.

Ingenico question

- How do you foresee the compliance process for this deadline without any mandatory process behind?
- How do you envisage the monitoring and/or evaluation process of this compliance?

Conclusion

We would like to thank the Eurosystem for this public consultation initiative and we are ready to collaborate with the Eurosystem if Ingenico expertise in payment security could be useful for the Eurosystem standardization effort.