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PSP Participation Agreement

Annex 3 Pilot PSP Feedback Framework





1. Context and objectives of the Pilot PSP Feedback Framework

The Pilot aims to validate key functionalities and operational processes of the Beta Digital Euro in a controlled environment, while also gaining deeper insights into stakeholder perceptions, including those of Pilot Payment Service Providers (PSPs) and End-Users, and into feedback on the product. These insights are key to strengthening the digital euro's value proposition and enhancing the overall user experience. To achieve this, it is essential to collect sufficient harmonised feedback, before, during and after the Pilot, ensuring that data collected across participating Member States and stakeholder groups is consistent, comparable and anonymised. The primary goal is to generate insights on the Beta Digital Euro's technical and operational feasibility, as well as qualitative feedback that can guide, where necessary, iterative improvements in design, user experience, branding, support processes, and overall product development, thereby ensuring that the digital euro meets the needs of all stakeholder groups.

This Annex establishes the instructions and obligations necessary for collecting consistent feedback across all Pilot PSPs throughout the Pilot. It also provides the scope, content, roles, responsibilities, and mechanisms of the Pilot PSP Feedback Framework.

The Pilot PSP shall:

- gather and provide, to an entity designated by the Participating National Central Bank (NCB), quantitative data originating from its technical systems and operational interactions during the Pilot.
- provide, to an entity designated by the Participating NCB, qualitative feedback on its experience in implementing and operating the Beta Digital Euro.
- gather and provide, to an entity designated by the Participating NCB, anonymised End-User data and feedback on their experience during the Pilot.

2. Scope of the Pilot PSP Feedback Framework

This Annex provides a high-level description of the obligations of the Pilot PSP regarding the collection and provision of data and feedback before, during and after the Pilot. The Pilot PSP shall comply with obligations in the following two complementary areas:

- (i) **Data collection and transmission:** The Pilot PSP shall collect and transmit, to an entity designated by the Participating NCB, quantitative data produced by its technical infrastructure and operational processes during the Pilot, in order to validate the reliability and performance of systems. It shall also collect and transmit to an entity designated by the Participating NCB anonymised data and feedback originating from [[Business End-Users and Individual End-Users] / [Business End-Users] / [Individual End-Users]] *[insert depending on the role of the Pilot PSP as acquiring, distributing, or dual role]*



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- (ii) **Provision of qualitative feedback on Pilot PSP experience:** The Pilot PSP shall provide qualitative feedback on its experience of the Pilot, including technical, operational, and organisational aspects, such as integration challenges, suggested process adaptations, collaboration with other Participants, and communication with the European Central Bank (ECB) and the Participating NCB.

3. Roles and responsibilities

As regards feedback-related activities, the Participating NCB and the Pilot PSP will have predefined roles and responsibilities before, during, and after the Pilot.

The **Participating NCB** shall:

- in cooperation with the ECB, support feedback collection at national level, and monitor participation and response rates at national level;
- indicate to the Pilot PSP the designated entity to which it should transmit the collected data and feedback;
- ensure the confidentiality and protection of any personal data that may be transmitted to the Participating NCB under the Pilot PSP Feedback Framework, which shall be strictly limited to the professional contact details of [[Business End-Users and Individual End-Users] / [Business End-Users] / [Individual End-Users]] *[insert depending on the role of the Pilot PSP as acquiring, distributing, or dual role]* who have given their explicit and informed consent (**Section 4**);

The **Pilot PSP** shall:

- establish internal processes to collect data on the areas described in **Section 2**;
- collect data according to the data collection principles described in **Section 4**;
- transmit the collected data to an entity designated by the Participating NCB, through the procedure and means described in **Section 6**;
- provide qualitative feedback on its experience with technical, operational and organisational aspects of the Pilot;
- ensure the confidentiality and protection of any personal data that they may gather and transmit under the Pilot PSP Feedback Framework, which shall be strictly limited to the professional contact details of [[Business End-Users and Individual End-Users] / [Business End-Users] / [Individual End-Users]] *[insert depending on the role of the Pilot PSP as acquiring, distributing, or dual role]* who have given their explicit and informed consent (**Section 4**);
- provide aggregated and anonymised End-User feedback to an entity designated by the Participating NCB.



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4. Data collection principles

Consistent feedback collection across Member States and stakeholders is essential. Therefore, harmonised data collection processes will be established for the Pilot PSP, ensuring a common overall approach. The feedback collected will support the monitoring of the Pilot Operational Phase, help identify areas where further refinement may be needed, and assess End-User experience as well as the Pilot PSP's experience in the Pilot, including their technical and operational integration. The following subsections describe the principles that shall apply to the collection of feedback and data by the Pilot PSP.

4.1 Regulatory compliance and processing of collected personal data

All personal data shall be processed in accordance with Regulation (EU) 2018/1725 (the EU Data Protection Regulation) and Regulation (EU) 2016/679 (the General Data Protection Regulation), as applicable.

The Pilot PSP shall not collect any [[Business End-User and Individual End-User] / [Business End-User] / [Individual End-User]] *[insert depending on the role of the Pilot PSP as acquiring, distributing, or dual role]* personal data or transmit such data to the ECB or the Participating NCB, without the explicit, informed and unambiguous consent of the [[Business End-User and Individual End-User] / [Business End-User] / [Individual End-User]] *[insert depending on the role of the Pilot PSP as acquiring, distributing, or dual role]*. Upon explicit, informed and freely given consent of each participating [[Business End-User and Individual End-User] / [Business End-User] / [Individual End-User]] *[insert depending on the role of the Pilot PSP as acquiring, distributing, or dual role]*, the Pilot PSP may collect and transmit only the professional or work email addresses of [[Business End-Users and Individual End-Users] / [Business End-Users] / [Individual End-Users]] *[insert depending on the role of the Pilot PSP as acquiring, distributing, or dual role]* who volunteer to participate in Pilot feedback activities. These contact details may only be transmitted to the ECB and the Participating NCB and shall be used solely for the purpose of asking End-Users for Pilot-related feedback. No other personal data shall be transmitted to the ECB or the Participating NCBs.

Prior to obtaining the mentioned consent, the Pilot PSP shall provide [[Business End-Users and Individual End-Users] / [Business End-Users] / [Individual End-Users]] *[insert depending on the role of the Pilot PSP as acquiring, distributing, or dual role]* with an objective and accessible description of how their data will be collected and subsequently processed for purposes of the Pilot PSP Feedback Framework.

The Pilot PSP shall collect and store proof of consent in a verifiable format that allows subsequent demonstration of compliance with the applicable data protection rules.

[[Business End-Users and Individual End-Users] / [Business End-Users] / [Individual End-Users]] *[insert depending on the role of the Pilot PSP as acquiring, distributing, or dual role]* shall be entitled to withdraw their consent at any moment, thereby preventing any further processing of their personal data collected by the Pilot PSP for purposes of the Pilot PSP Feedback Framework.



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Personal data collected for the purposes of the Pilot PSP Feedback Framework shall be used by the ECB and the Participating NCB solely to fulfil the objectives set out by the Pilot PSP Feedback Framework. The processing of personal data for the purposes of the Pilot PSP Feedback Framework shall be limited in time and shall not be prolonged beyond what is strictly necessary to fulfil the objectives of the Pilot and to complete the associated post-Pilot evaluation activities.

The Participating NCB and the Pilot PSP shall continuously ensure that they have the necessary technical and organisational measures to ensure this compliance and the protection of the right of the [[Business End-User and Individual End-User] / [Business End-User] / [Individual End-User]] *[insert depending on the role of the Pilot PSP as acquiring, distributing, or dual role]* to data protection in compliance with the applicable laws and regulations.

4.2 Data minimisation and anonymisation

The processing of personal data shall follow data minimisation principles: the collection, storage and processing of personal data shall be limited only to what is directly relevant, necessary and proportionate to accomplish the goals of this Pilot PSP Feedback Framework (**Section 1**).

The Pilot PSP shall ensure that all personal data and feedback are anonymised prior to their transmission to an entity designated by the Participating NCB and throughout the feedback collection, analysis and reporting process, in order to safeguard privacy and ensure regulatory compliance.

4.3 End-User rights as data subjects

[[Business End-Users and Individual End-Users] / [Business End-Users] / [Individual End-Users]] *[insert depending on the role of the Pilot PSP as acquiring, distributing, or dual role]* shall be entitled to exercise their rights as data subjects, meaning that they shall be able to request access to their personal data and the restriction of its processing. [[Business End-Users and Individual End-Users] / [Business End-Users] / [Individual End-Users]] *[insert depending on the role of the Pilot PSP as acquiring, distributing, or dual role]* shall also be entitled to withdraw their consent for such processing at any time. The Pilot PSP shall provide [[Business End-Users and Individual End-Users] / [Business End-Users] / [Individual End-Users]] *[insert depending on the role of the Pilot PSP as acquiring, distributing, or dual role]* with clear and appropriate information on the channels through which they may exercise these rights or file a complaint against the accountable parties.

5. Feedback categories

The Pilot PSP shall collect and provide feedback, on the following aspects of the digital euro Pilot:



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- **Pilot PSP technical and operational integration:** the integration of the Pilot PSP's systems and workflows with Beta Digital Euro infrastructure.
- **Pilot PSP operational satisfaction and experience:** the Pilot PSP's satisfaction with the provided instructions, the onboarding and preparation process and the required operational effort, as well as their overall experience of facilitating Pilot Payment Services, including support and incident management and the impact on their interactions with [[Business End-Users and Individual End-Users] / [Business End-Users] / [Individual End-Users]] *[insert depending on the role of the Pilot PSP as acquiring, distributing, or dual role]*.
- **End-User product experience, satisfaction, engagement and momentum:** perceptions of [[Business End-Users and Individual End-Users] / [Business End-Users] / [Individual End-Users]] *[insert depending on the role of the Pilot PSP as acquiring, distributing, or dual role]* regarding the digital euro Pilot, including their experience with onboarding, user-friendliness, user journeys, Pilot Payment Services, and interactions related to issues, complaints or support services.
- **Pilot preparation and execution:** the Pilot PSP's experience with the overall process of preparing for and carrying out the Pilot, including the application process, technical set up and integration activities, onboarding steps, implementation of required functionalities, the responsiveness of support channels, the clarity of roles and responsibilities, and the extent to which Pilot activities reflected real world operational conditions.

6. Feedback collection timeline and methods

The Pilot PSP shall provide feedback from the start of the Pilot Development Phase, and for six months after the end of the Pilot Operational Phase, to ensure that post-Pilot insights are captured and can be incorporated and potentially reflected in the digital euro's design even after the Pilot formally ends.

In its capacity both as Pilot PSP and as enabler for [[Business End-User and Individual End-User] / [Business End-User] / [Individual End-User]] *[insert depending on the role of the Pilot PSP as acquiring, distributing, or dual role]* feedback, the Pilot PSP shall collect, provide and transmit feedback through a variety of mechanisms, including, but not limited to, system reporting, templates, short surveys, focus sessions or workshops, enabling a wide range of engagement in terms of the breadth and depth of insights.

Feedback will be analysed by the ECB and the Participating NCBs to support decision making and ensure continuous alignment with the objectives of the Pilot.



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7. Participating NCB support to the Pilot PSP

The Participating NCB shall support the Pilot PSP in performing the activities set out herein and in ensuring that the collection and transmission of data and feedback is carried out in a proportional, consistent and secure manner.

Such support includes, but is not limited to, the provision of templates, tools and guidance materials, as well as feedback on potential improvements to the Pilot PSP's processes and operations.