



EUROPEAN CENTRAL BANK

EUROSYSTEM

Digital euro pilot

Pilot PSP feedback framework



Disclaimer: This document is indicative and may be subject to modifications. The design, features, and scope of a digital euro may also differ if issued in the future.



EUROPEAN CENTRAL BANK

EUROSYSTEM

1. Context and objectives of the pilot PSP feedback framework

The digital euro 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 (merchants and consumers), and 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 countries and stakeholder groups is consistent, comparable and anonymised. The primary goal is to generate insights on the 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 the digital euro meets the needs of all stakeholder groups.

This document establishes the guidelines and obligations necessary for collecting consistent feedback from all pilot PSPs throughout the pilot. It also provides an overview of the scope, content, roles, responsibilities and mechanisms of the pilot PSP feedback framework.

Pilot PSPs shall:

- collect and provide, to an entity designated by the participating national central bank (NCB) quantitative data originating from their technical systems and operational interactions during the pilot;
- provide, to an entity designated by the participating NCB, qualitative feedback on their experience in implementing and operating the beta digital euro;
- collect and provide, to an entity designated by the participating NCB, anonymised end user feedback on their experience during the pilot.

2. Scope of the pilot PSP feedback framework

This document provides a high-level description of the obligations of pilot PSPs regarding the collection and provision of data and feedback before, during and after the digital euro pilot. Pilot PSPs shall comply with obligations in the following two complementary areas:

- (i) **Data collection and transmission:** pilot PSPs shall collect and transmit, to an entity designated by the participating NCB, quantitative data produced by their technical infrastructure and operational processes during the pilot, in order to validate the reliability and performance of systems. They shall also collect and transmit, to an entity designated by the participating NCB, anonymised data and feedback originating from end users.



EUROPEAN CENTRAL BANK

EUROSYSTEM

- (ii) **Provision of qualitative feedback on pilot PSP experience:** pilot PSPs shall provide qualitative feedback on their 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 relevant NCB.

3. Roles and responsibilities

As regards feedback-related activities, ECB, participating NCBs, and pilot PSPs will have predefined roles and responsibilities before, during, and after the digital euro pilot.

The **ECB** shall:

- coordinate and monitor the management of the pilot PSP feedback framework;
- monitor participation and response rates;
- ensure the confidentiality and protection of any personal data that may be transmitted to the ECB under the pilot PSP feedback framework, which shall be strictly limited to the professional contact details of end users who have given their explicit and informed consent (**Section 4**);
- provide updates to the pilot's governance bodies;

The participating **NCBs** shall:

- in cooperation with the ECB, support feedback collection at national level, and monitor participation and response rates at national level;
- indicate to pilot PSPs the designated entity to which they should transmit the collected data and feedback;
- ensure the confidentiality and protection of any personal data that may be transmitted to the NCB under the pilot PSP feedback framework, which shall be strictly limited to the professional contact details of end users who have given their explicit and informed consent (**Section 4**);

The **pilot PSPs** shall:

- establish internal processes for the collection of data in 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 their experience with technical, operational and organisational aspects of the pilot;
- ensure the confidentiality and protection of any personal data that they may collect and transmit under the pilot PSP feedback framework, which shall be strictly limited to the professional contact

details of end users who have given their explicit and informed consent (**Section 4**) and provide aggregated and anonymised end user feedback to an entity designated by the participating NCB.

4. Feedback collection principles

Consistent feedback across countries and stakeholders is essential. Therefore, harmonised data collection processes will be established for pilot PSPs, ensuring a common overall approach. The feedback collected will support the monitoring of the operational phase of the pilot, help identify areas where further refinement may be needed, and assess pilot PSPs' experience in the pilot, their technical and operational integration, and the end user experience. The following subsections describe the principles that shall guide pilot PSP data collection.

4.1 Regulatory compliance and processing of 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.

Pilot PSPs shall not collect any end user personal data or transmit such data to the ECB or the participating NCBs, without the explicit, informed and unambiguous consent of the end user. Upon explicit, informed and freely given consent of each participating end user, pilot PSPs may collect and transmit only the professional or work email addresses of end users who volunteer to participate in pilot feedback activities. These contact data may only be transmitted to the ECB and the participating NCBs. These contact details shall be used solely for the purpose of asking end users for pilot-related feedback. No other end user personal data shall be transmitted to the ECB or participating NCBs.

Prior to obtaining the end user's consent, pilot PSPs shall provide the end user with an objective and accessible description of how their data will be collected and subsequently processed for the purposes of the pilot PSP feedback framework.

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

End users shall be entitled to withdraw their consent at any moment, thereby preventing any further processing of their personal data by the pilot PSP for the purposes of the pilot PSP feedback framework.

The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Personal data collected for the purposes of the digital euro pilot PSP feedback framework shall be used 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 ECB, the participating NCBs and the pilot PSPs shall continuously ensure that they have the necessary technical and organisational measures in place to ensure the protection of the end user's data protection rights in compliance with the applicable regulation.

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**).

Pilot PSPs shall ensure that all personal data and responses are anonymised before being transmitted to the ECB and participating NCBs 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

End users shall be entitled to exercise their rights as data subjects, meaning that they shall be able to request access to or deletion of their personal data or restriction of its processing. They shall also be entitled to withdraw their consent for such processing at any time. End users shall be provided with the proper information on the channels through which they may exercise these rights or file a complaint against the accountable parties.

5. Feedback categories

Pilot PSPs shall collect and provide feedback on the following aspects of the digital euro pilot:

- **PSP technical and operational integration:** the integration of pilot PSP systems and workflows with beta digital euro infrastructure.
- **PSP operational satisfaction and experience:** pilot PSP 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 interaction with end users.
- **End user product experience, satisfaction, engagement and momentum:** end user perceptions of 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:** pilot PSPs' experience with the overall process of preparing for and carrying out the Pilot, including the application phase, 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

Pilot PSPs shall provide feedback from the start of the development phase of the pilot and for six months after the end of the operational phase, to ensure that their insights can be captured and potentially reflected in the digital euro's design even after the pilot formally ends.

In their capacity both as pilot PSPs and as transmitters of end user feedback, pilot PSPs shall provide and transmit feedback through a variety of mechanisms, including system reporting, templates, short surveys, focus sessions and workshops, allowing a wide range of engagement in terms of the breadth and depth of insights.

Feedback shall be transmitted through the channels and tools indicated for this purpose and will be analysed by the ECB and the participating NCBs to support decision-making and ensure continuous alignment with the objectives of the pilot.

7. NCB support to the participating pilot PSPs

Participating NCBs shall support pilot PSPs in performing the activities set out herein and in ensuring that the collection of data and feedback is carried out in a proportional, consistent and secure manner.

Such support may include the provision of templates, tools and guidance materials, as well as feedback on possible improvements to pilot PSP processes and operations.