TRUST & COMPLIANCE · DUE DILIGENCE

A Guide to Choosing a Payments Partner

The five questions that separate a stable, accountable provider from a well-marketed one, and the answers that should give you pause.

FINXP · GUIDES SERIES

“One EMI Licence, Independent, Direct SEPA access, built to say yes.”

INTRODUCTION

Who this guide is for

This guide is for businesses comparing payment providers who want a clear way to judge each option on what actually affects reliability, rather than on features or marketing claims.

It sets out five questions to ask every provider, the answers that should give you pause, and why direct access to licences and infrastructure changes what a provider can genuinely commit to.

Why a checklist, not a comparison

Most payment providers describe themselves in the same words: licensed, secure, experienced. Those terms do not help you tell one from another, because they reveal nothing about what sits behind the claim. It is far more useful to ask every provider the same set of questions and to notice how clearly and specifically each one answers.

A comparison table built from marketing pages will flatter whoever writes the best copy. A structured set of questions does the opposite. It rewards providers that can point to a register entry, a membership type or a named escalation route, and it exposes those that cannot.

> Five areas separate a stable, accountable provider from a well-marketed one: licensing, fund safeguarding, scheme membership, sector experience and onboarding approach. Ask about all five, in the same order, every time.

How to use this guide

- ✓ Ask all five questions of every provider, in the same order, and keep the wording consistent.
- ✓ Record the answers side by side, in the provider's own words, rather than summarising them.
- ✓ Mark each answer as specific, partial or general, and note anything you were told you would receive later.
- ✓ Verify independently what can be verified, and treat the rest as a claim until it is evidenced.

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The five questions to ask

Ask each provider the same five questions and record the answers side by side. What matters is not whether an answer sounds reassuring, but whether it is specific enough to be checked.

AREA	QUESTION TO ASK	RED FLAG IN THE ANSWER
Licensing	Do you hold your licence directly, and can I verify it on the regulator's register?	A vague answer, no register reference, or reliance on another partner's licence.
Fund safeguarding	How are client funds segregated, and is this demonstrable rather than asserted?	No clear description of segregation, or funds not held apart from operational funds.
Scheme membership	Is card scheme membership held directly, or accessed through a sponsor?	A sponsorship arrangement that is not disclosed until you ask directly.
Sector experience	Have you worked with businesses in my sector, and for how long?	No sector-specific experience, or generic risk language applied to every applicant.
Onboarding approach	Is onboarding automated only, or is there a human review route for complex cases?	Automated only, with no escalation path and no explanation for a decision.

How to use the answers

Treat specificity as the signal. A provider that names its regulator, quotes its register entry and states its scheme membership type is describing something it controls. A provider that answers in general terms is usually describing something held by someone else.

Verify what you can independently. Regulatory claims can be checked on the regulator's public register, and scheme membership can often be confirmed with the scheme directly. For sector experience, ask about comparable clients and use cases rather than accepting a general statement.

> If a provider cannot answer in specifics, that is itself the answer. The detail either belongs to the provider, in which case it can be produced, or it belongs to someone else.

APPLICATION

Direct access versus reselling

Running through all five areas is a single question: does the provider hold its own licence, scheme membership and infrastructure, or does it resell or sponsor access from another party? Both models can look identical from the outside. The difference shows when something needs to change quickly, be tracked closely, or work reliably over a long period.

A provider with direct access can answer due-diligence questions in detail: which regulator supervises it, where its register entry sits, what type of scheme membership it holds. A provider working through an intermediary tends to answer in general terms, because the detail belongs to someone else. Neither model is automatically wrong, but you should know which one you are dealing with, because it shapes what the provider can genuinely guarantee.

Red flags worth taking seriously

- **Licence evasiveness**
  Reluctance to confirm licence status, or to point you to a public regulator register.

- **Automated-only onboarding**
  No route to human review, and no explanation given for a decision either way.

- **Vague safeguarding**
  An evasive or general answer on how client funds are held apart from operational funds.

- **Unclear scheme access**
  Card access described in general terms, without stating direct membership or sponsorship.

- **No sector experience**
  No experience of businesses like yours, or generic risk language applied to every applicant.

- **Third-party dependencies**
  Terms and schedules that rest on another party's decisions the provider cannot explain.

> None of these signs is disqualifying on its own. Providers communicate differently, and one unclear answer is not necessarily a problem. Vague answers across several of the five areas are a much stronger signal, and worth taking seriously.

Before you sign

- ✓ Confirm the licence holder and the register entry in writing, not just the licence type.
- ✓ Confirm whether scheme access is direct membership or sponsorship, and who approves changes.
- ✓ Confirm the escalation route for a declined or delayed case, and who owns the decision.

FAQ

Frequently asked questions

Q. Is a longer or more detailed onboarding process a bad sign?

Not necessarily. Reviewing a complex business properly takes longer than an automated check, and the extra time usually means a real assessment is being carried out. The issue is a provider that goes quiet during the process, not the length of the process itself.

Q. Does holding a licence directly always mean better service?

It usually means fewer outside dependencies and clearer accountability, which tends to produce more reliable service over time. Service quality still depends on more than licensing, so treat direct licensing as important rather than as a guarantee in itself.

Q. What if a provider will not answer these questions directly?

Treat the reluctance as information. Providers that are confident in their structure and compliance rarely have difficulty giving clear, specific answers about licensing, safeguarding and scheme access.

Q. How can a business check the claims made during a sales process?

Regulatory claims can be checked on the regulator's public register, and scheme membership can often be confirmed with the scheme directly. For sector experience, ask specific questions about comparable clients and use cases instead of accepting general statements.

Q. Should the checklist be used the same way for every provider?

Yes. Asking each provider the same five questions in the same order keeps the comparison fair and keeps the focus on substance rather than on the quality of the sales pitch.

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Related guides in this series

A Guide to Electronic Money Institution Licensing
What an EMI licence permits, and how it differs from a banking licence.

A Guide to Fund Safeguarding
How client funds are segregated in practice, and what that protection actually means.

A Guide to Onboarding for Complex Businesses
What human-reviewed onboarding looks like, and why it suits businesses that do not fit an automated checklist.

Ask the same five questions.
Judge the answers, not the pitch.

FinXP is a privately owned European payments company with twelve years of experience supporting regulated businesses across fintechs, PSPs and banks, digital assets and Web3, marketplaces and platforms, payroll and contractors, and digital commerce.

As an independent company, FinXP has built its own infrastructure without the constraints of a parent group. With an Electronic Money Institution licence in Malta, Mastercard Principal Membership, and direct participation in CENTROlink, FinXP holds the answers to these five questions itself, rather than relying on another party for them.

12+	€4bn+	12,000+	41
YEARS IN PAYMENTS	PROCESSED ANNUALLY	BUSINESS ACCOUNTS OPENED	EUROPEAN NATIONS, DIRECT CENTROLINK

For businesses turned away elsewhere for being “too complicated”, FinXP’s independence and experience open a route to a workable answer instead of a closed door.

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