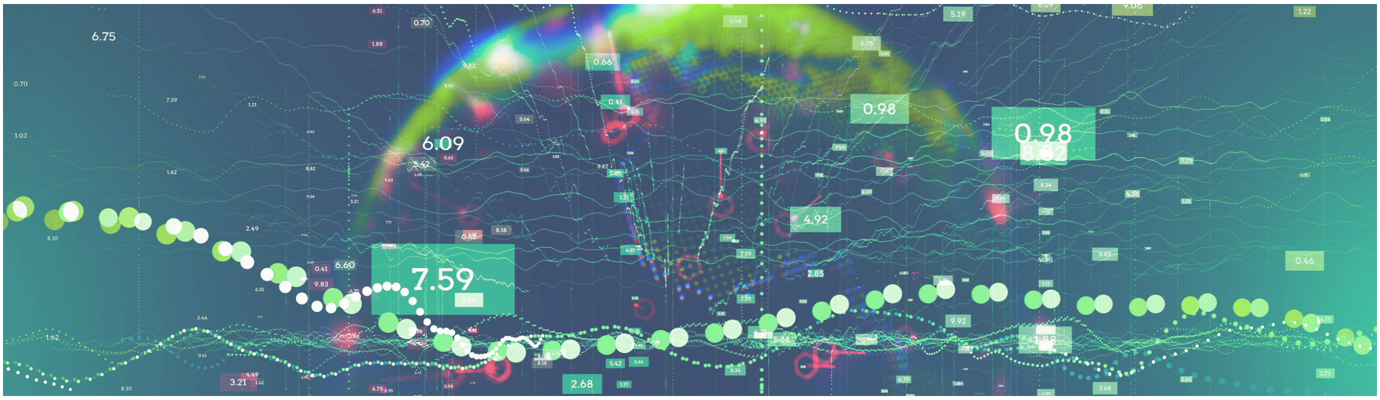
eba European Banking Authority

eiopa European Insurance and Occupational Pensions Authority

ESMA European Securities and Markets Authority

JOINT COMMITTEE OF THE EUROPEAN SUPERVISORY AUTHORITIES

2025 Joint ESA stocktaking of BigTechs' direct financial services activities in the EU



This factsheet presents the results of the 2025 BigTech monitoring exercise, as a follow-up to the 2024 Report[1].

What are BigTechs?

BigTechs are large technology companies with extensive customer networks. They operate across sectors and jurisdictions[2], combining core commercial activities - such as e-commerce, communications, or digital infrastructure - with financial services provision in some countries.

Their large user base, extensive data access, and ecosystem-driven business models enable them to potentially scale rapidly and integrate financial services seamlessly into consumer-facing interfaces.

BigTechs' client types

BigTechs typically serve both retail and corporate clients. The mixed client base is reflective of the broad reach and diverse nature of the overall product and service portfolio offered by BigTechs.

Why do the ESAs monitor BigTechs?

The 2022 Joint ESA response to the European Commission's Call for Advice on Digital Finance identified the need to foster the monitoring of BigTech groups in the EU financial sector due to their growing relevance[3] and broad customer reach[4].

In 2023, the ESAs conducted their first joint monitoring exercise, leading to an agreement for continued actions aimed at improving monitoring of BigTech groups across sectors.

The BigTech groups included in the 2025 monitoring exercise

The BigTech groups included in the 2025 monitoring exercise are: Alphabet, Amazon, Ant Group, Apple, Booking.com, ByteDance, Meta, Microsoft, NTT Docomo, Rakuten, Tencent, Uber and Vodafone.

1. Joint ESA Report on 2023 Stocktaking of BigTech direct financial services provision in the EU.
2. FSI Insights on policy implementation, No 60, A two-sided affair: banks and tech firms in banking, October 2024.
3. Joint ESA response to the European Commission's February 2021 Call for Advice on digital finance and related issues.
4. The European Commission has designated several BigTech group companies as 'gatekeepers', reflecting their significant market influence through the provision of core platform services and broad customer reach. These core platform services include, among others, online intermediation services, online search engines, communication platforms and operating systems.

Current landscape of BigTechs' financial services activity in the EU

The 2025 exercise identifies that 11 of the 13 BigTech groups have subsidiaries carrying out financial services in the EU, primarily payment services, e-money issuance and insurance intermediation. In total, 20 subsidiaries operate with licences or leveraging PSD2 exclusions.

A total of 10 licensed subsidiaries from 8 BigTech groups are authorised to provide financial services in the EU (see Table). Among these, 4 are licensed as electronic money institutions[5], 3 as insurance undertakings or intermediaries, 2 as payment institutions, and 1 as a credit institution.

Compared to the 2023 data, no new licences have been granted to BigTech subsidiaries in the EU and no new types of financial services are being carried out[6].

Table: Licensed EU subsidiaries of BigTechs

Group	Type of licence	Subsidiary	Home Member State
Alphabet (Google)	EMI	Google Payment Lithuania	Lithuania
	PI	Google Payment Ireland Limited	Ireland
Amazon	EMI	Amazon Payment Europe SCA	Luxembourg
	Insurance intermediary	Amazon EU Sarl	Luxembourg
AntGroup	EMI	Alipay (Europe) Limited S.A.	Luxembourg
Apple	Insurance intermediary	Apple Distribution International Limited	Ireland
Rakuten	CI	Rakuten Europe Bank S.A.	Luxembourg
Tencent	PI	WeChat Pay Europe B.V.	Netherlands
Uber	EMI	Uber Payments B.V.	Netherlands
Vodafone	Insurance undertaking	Vodafone Insurance Limited	Malta

'EMI' – electronic-money institution, 'PI' – payment institution, 'CI' – credit institution.

In addition, 11 subsidiaries[7] from 5 BigTech groups rely on exclusions under the second Payment Services Directive (PSD2) and carry out specific payment services without the need for a licence. One of these entities also holds a licence as an insurance intermediary[8]. The PSD2 exclusions relied upon by BigTech subsidiaries are:

- **The limited network exclusion** (Article 3(k) of PSD2) applies to payment instruments that can only be used in a restricted way. This includes instruments accepted by a specific retailer or a limited network of service providers, and instruments that can be used exclusively to acquire a very limited range of goods or services. Such payment instruments include store cards, transport cards, vouchers or in-app purchases.

- **The electronic communications exclusion** (Article 3(l) of PSD2) allows providers of telecommunication services to process certain low-value payment transactions as part of their broader service offerings. These include payments for digital content, voice-based services or electronic tickets.

5. Facebook Payments International Limited's EMI licence was discontinued in January 2025.
6. No comparison of volumes and values has been made.
7. BigTechs' subsidiaries providing payment services pursuant to PSD2 exclusions: Apple Distribution International Limited, Facebook Payments International Ltd, Microsoft Ireland Operations Limited, Docomo Digital Germany GmbH, Vodafone España S.A.U., Vodafone Ono, S.A.U., Vodafone România S.A., Vodafone Italia S.P.A., Vodafone Ireland Limited, Vodafone Kabel Deutschland GmbH, Vodafone GmbH.
8. Apple Distribution International Limited.

Background

The 2025 BigTech monitoring exercise in the EU

The 2025 monitoring exercise, conducted through the European Forum for Innovation Facilitators (EFIF)[9], maps the direct provision of financial services by subsidiaries of BigTech groups operating in the EU. It examines their authorisation status to carry out regulated financial services, the types of services offered, their customer base and cross-border operations.

Next steps

The ESAs will continue monitoring the relevance of BigTechs to the EU financial sector, both in terms of direct financial services provision and as data and technology providers. The ESAs will place particular emphasis on strengthening cross-border and cross-disciplinary supervisory coordination, recognising the potential for BigTechs to further scale their financial activities in the EU.

The ESAs’ next steps include:

- Encouraging further data transparency and data sharing between supervisors regarding the provision of financial services by BigTech subsidiaries (either directly or indirectly via novel distribution channels such as white labelling[10]).

- Monitoring developments under the Digital Operational Resilience Act (DORA), in particular the potential designation of BigTechs as critical ICT third-party service providers (CTPPs) and the associated implications.

- Taking stock of developments under the Digital Markets Act (DMA), including the designation of BigTechs as gatekeepers and the potential impact on the financial sector.

9. EFIF comprises national competent authorities (NCAs) represented on the Board of Supervisors of each ESA. NCAs submitted data for this exercise on a best-efforts basis.
10. White labelling comprises a business model in which a financial institution (i.e. white label provider) enters into an agreement with another firm (white label partner), to offer one or more financial products and services under the partner’s own brand only.