

Regulations Introduced Regarding the Integration of Payment Service Providers with the BKM API Gateway and Digital Wallet Services

A. Introduction

On March 28, 2025, the Regulation Amending the Regulation on Payment Services and Electronic Money Issuance and Payment Service Providers (“**Amendment Regulation**”) and the Communiqué Amending the Communiqué on Information Systems of Payment and Electronic Money Institutions and the Data Sharing Services of Payment Service Providers in the Field of Payment Services (“**Amendment Communiqué**”) were published by the Central Bank of the Republic of Türkiye with the aim of promoting the digitalization of financial services, ensuring the efficiency and security of open banking infrastructure, and maintaining fair competition.

You can access the Amendment Regulation [here](#), and the Amendment Communiqué [here](#).

B. Regulations Introduced by the Amendments

The Amendment Communiqué narrows the scope of payment service providers obliged to connect to the BKM API Gateway and establish the necessary infrastructure, while also defining the compliance deadlines.

Under the Amendment Regulation, the obligation to connect to the BKM API Gateway and establish the required infrastructure is now determined based on payment volume and participation in the FAST system.

In addition, the Amendment Regulation revises the compliance deadlines for institutions providing digital wallet services.

1. Obligation to Connect to the BKM API Gateway and Provide Infrastructure

With the amendment made within the scope of the Amending Regulation, the obligation to connect to the BKM API Gateway, which is foreseen for all payment service providers that hold payment accounts, has been amended to be foreseen for payment service providers that hold payment accounts that may be related to the payment services listed in subparagraphs (f) or (g) of the first paragraph of Article 4 of the Regulation and provide direct online access to their customers for the payment accounts held with them, and the obligation to connect to the BKM API Gateway for payment service providers that provide only offline access to their customers has been removed.

With the amendments made within the scope of the Amendment Regulation and the Amendment Communiqué, the periods regarding the obligation to comply with the regulations have been determined differently according to the categories as follows:

- For FAST participants and non-participants that provide direct online access to customers and ranked among the top ten institutions in terms of payment volume for the 2024 calendar year **December 31, 2025**
- For non-FAST participants: If they become participants, they must comply **within 6 months** from the date of participation.

- For institutions that are not currently among the top ten but reach top-ten payment volume rankings in subsequent years: compliance is required **by the end of that calendar year**.

2. Compliance Obligation for Digital Wallet Service Providers

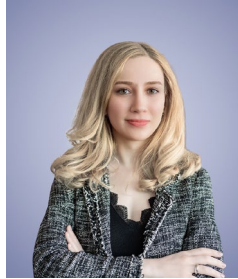
According to the amendments under the Amendment Regulation, the deadline for full compliance for institutions already offering digital wallet services, as well as the deadline for individuals or entities providing digital wallet services without an operational license to apply to the Central Bank of the Republic of Türkiye for the necessary permissions, has been extended from April 7, 2025 to December 31, 2025.

C. Conclusion

With the changes introduced by the Amendment Regulation and Communiqué dated March 28, 2025, the definition of account service providers has been narrowed, compliance deadlines have been extended, and the final deadline for obtaining a license for digital wallet service providers has also been postponed.

For more information and support, you can contact us at info@lbpartners.com.

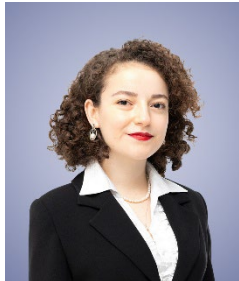
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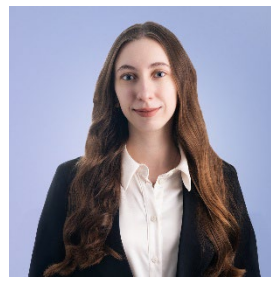
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