



EASY SWITCHING ? – A LONG WAY TO GO

BEUC Monitoring Report

of the

'Common Principles for Bank Account Switching'

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Executive Summary

The Common Principles for Bank Account Switching adopted by the European banking community entered into force in all EU Member States and Norway in November 2009 with the objective to facilitate switching of personal current accounts at national level.

In 2010, BEUC and its member associations carried out a monitoring of banks' compliance with these Common Principles in a selected number of Western and Eastern European countries. The monitoring consisted of the following three steps: monitoring of bank websites (covering EU27 and Norway), collecting consumer testimonies about their recent switching experience and mystery shopping exercises.

Non-compliance by banks with the Common Principles was found in many countries with regard to: availability of consumer information on bank websites and at bank branches, bank staff preparedness to inform and help consumers with the switching service, transfer of direct debit mandates between banks and switching delays.

While we noticed some progress in facilitating switching of bank accounts, it remains obvious that the implementation of the Common Principles at bank branch level is inconsistent and insufficient. Indeed, the Common Principles were adopted in November 2008 with an implementation period of one year before their entry into force in November 2009.

Based on the report's findings, we put forward the following recommendations on how to really improve the switching process:

- Provide better training of bank staff;
- Put in place an automatic re-routing system;
- Set up account number portability;
- Set a deadline for the closure of the 'former' account;
- Ensure proper enforcement and supervision;
- Adopt binding legislation on switching.

The European Commission's own monitoring of the Common Principles which will be carried out this year should be decisive with regard to the next steps. All our above mentioned recommendations should be implemented if BEUC findings are confirmed by the European Commission monitoring report of the CP expected by the end of 2011.

To address the general issue of low consumer mobility in relation to personal current accounts, we ask the European legislator and national governments to:

- Ensure proper understanding and comparability of bank fees;
- Address the issue of unfair commercial practices, notably tying and bundling.

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Introduction

Bank accounts¹ enable us to deposit money, receive our salary, benefits or pension, make withdrawals and pay for goods and services and allow us, in other words, to live a normal life without being excluded from society.

Having access to a bank account is not sufficient. As for any other product and service, a bank account must also meet consumer needs both in terms of price and quality of services provided. For these reasons, each time a consumer is dissatisfied with his current provider or wants to make a better deal, he should be able to easily switch to another bank. This is not the case in reality. In comparison with other consumer markets such as for car and home insurances, internet and telephone services, consumer mobility in relation to current bank accounts is very limited. According to European Commission surveys, in average, 9% of EU consumers changed their current account providers during years 2007-2008 while 25% and 22% of consumers changed their car insurance provider and internet provider respectively during the same period². For various reasons, consumers think they will not get a better deal in another bank and those who are willing to switch have to face several obstacles³.

Customer mobility is both a fundamental right for consumers and a key factor to boost competition. Barriers to switching are barriers to competition, particularly in retail banking. Two fundamental ingredients are necessary in this respect: availability of clear and comparable market offers and an easy switching process from one bank to another.

For a consumer to change bank, benefits of this operation must outweigh the costs. High switching costs and other obstacles act as factors preventing consumers from switching to another bank. Among those obstacles are the following:

- consumer unawareness of the level of fees levied by his/her financial service provider⁴;
- difficulty in shopping around (complex and incomparable information);
- administrative burden related to switching;
- closing fees;
- tying and other similar commercial practices which lead to numerous ties between the bank and the customer.

¹ The same role is also played by payment accounts which are not available everywhere in the EU.

² Second edition of the Consumer Markets Scoreboard, European Commission, Directorate General for Health and Consumers, January 2009:
http://ec.europa.eu/consumers/strategy/docs/2nd_edition_scoreboard_en.pdf

³ See the Report of the EC Expert Group on Customer Mobility in relation to bank accounts, June 2007:
http://ec.europa.eu/internal_market/finservices-retail/mobility/baeg_en.htm

⁴ Commission staff working document on the follow up in retail financial services to the consumer markets scoreboard, SEC (2009) 1251 final, 22.09.2009:
http://ec.europa.eu/consumers/rights/docs/swd_retail_fin_services_en.pdf

Code of conduct on transparency and comparability of bank account fees is being developed by EBIC upon the request of the European Commission.

Although switching bank accounts is not an objective per se⁵, the possibility to easily switch between banks is a prerequisite to offer consumers better deals and increase competition by notably allowing new actors or alternative actors as payment services providers to be present and compete on this market.

In order to solve the issue of administrative burden to switching, in 2007 the European Commission invited the European banking community to develop, via self-regulation, a set of rules to facilitate transferring bank accounts between banks at national level⁶.

This report, based on monitoring made by consumer organisations, provides an indication of the level of implementation of this set of rules one year after its entry into force.

1. Background information

EBIC Common Principles for Bank Account Switching (CP)⁷ were developed in 2008 by the European Banking Industry (EBIC), a body representing the European banking industry at EU level. BEUC was invited by the European Commission to make comments and suggestions how to make the switching process efficient and more consumer-friendly. It needs to be noticed that, because of non-satisfactory self-regulation experiences in the financial services area, BEUC and its members were initially not in favour of a code of conduct.

The CP became operational in all EU Member States in November 2009. Its scope is limited to switching *current accounts* within a particular country. The CP provide that consumers can choose to select the 'new' bank as the Primary Contact Point for switching their account, i.e. the 'new' bank performs the following tasks:

- Provides the consumer with a guide to switching;
- Opens a new bank account for the consumer;
- Requests the 'former' bank to provide a list with information to identify standing orders for credit transfers and available direct debit mandates on the 'former' account;
- Requests the 'former' bank to close standing orders for credit transfers and stop direct debits, upon explicit authorisation of the consumer;
- Helps the consumer to provide the new account details to third parties;
- With consent of the consumer, establishes existing standing orders for credit transfers and accepts direct debits on the new account upon receiving the relevant information from the 'former' bank or the consumer.

⁵ Indeed, a consumer may stay longtime with the same bank because a high level of satisfaction with tariffs and/or quality of services received.

⁶ "Initiatives in the area of retail financial services", Commission staff working document, SEC(2007) 1520, 2007, p. 2: http://ec.europa.eu/citizens_agenda/docs/sec_2007_1520_en.pdf

⁷ EBIC Common Principles for Bank Account Switching:
<http://www.eubic.org/Position%20papers/2008.12.01%20Common%20Principles.pdf>

Switching must be free of charge unless the account at the 'former' bank is open since less than 12 months⁸ and/or information necessary for switching is not available through an automated process at the 'former' bank and reaches back more than 13 months.

Switching must occur within 14 banking working days: 7 banking working days for the 'former' bank to provide all the available information to identify standing orders for credit transfers and to identify direct debit mandates on the old account; and 7 banking working days for the 'new' bank to set up standing orders and to accept direct debits on the new bank account and notify, where applicable, creditors of direct debits about the change of bank account.

A review process should be undertaken by EBIC one year after the entry into force of the CP. An evaluation process was equally foreseen. BEUC and its members have decided to run their own monitoring of the CP, which forms the subject of the present report. The objective was not to monitor the functioning of the CP in all EU countries, but in a selected group of countries from Western and Eastern Europe.

It should be noted that in a number of countries switching codes or services have existed prior to the CP. Given that the CP are based on a minimum harmonisation approach, the already existing codes have been continued. This is the case in the UK, the Netherlands, Italy, Ireland and Norway.

2. Bank website monitoring

The initial step of the BEUC monitoring consisted of checking the availability of information on current bank account switching services on bank websites throughout Europe. According to the CP, banks must provide consumers who want to switch their current account with clear and complete information. Such information should be available either at bank branches and/or on bank websites. Widespread use of Internet by consumers to look for information and the growth of online banking in many EU Member States have justified our choice to concentrate on bank website. For more and more consumers, it is not necessary to go to their bank branch to find information on banks services, including on bank's switching service.

However, checking the availability of switching information at bank branches did happen in four Member States by BEUC members that carried out a mystery shopping (see step three of the monitoring).

2.1 Methodology

The website check was conducted twice by the BEUC secretariat and national consumer organisations first in May 2010 and later in November 2010 in order to identify any improvement of consumer information. The bank sample covers banks from all 27 EU Member States plus Norway.

⁸ Article 45 (2) and (4) of the Payment Services Directive:

2. Termination of a framework contract concluded for a fixed period exceeding 12 months or for an indefinite period shall be free of charge for the payment service user after the expiry of 12 months. In all other cases charges for the termination shall be appropriate and in line with costs.
4. Charges for payment services levied on a regular basis shall be payable by the payment service user only proportionally up to the termination of the contract. If such charges are paid in advance, they shall be reimbursed proportionally.

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2007:319:0001:01:EN:HTML>

Four main guiding criteria were taken into account at this step in order to obtain an objective outcome. These criteria are as follows:

- Sample representativeness, i.e. justification of the choice of banks included in the sample;
- Availability of information on bank account switching on the bank websites;
- Actual accessibility of information, i.e. easiness to find it on the bank website;
- Completeness and clarity of information.

Sample representativeness

It has to be noted that since November 1st, 2009, each EU bank must comply with the CP and possible additional measures adopted at national level.

Because it is difficult to check all EU banks' websites, we limited our monitoring activity to a representative sample of banks in each EU Member State.

The number of banks checked per country varies from three to six banks. In a majority of Member States however the number of bank websites visited is five.

Banks were picked according to their size measured by market share (big and small banks) and geographical area of activity (multinational and local banks, national and foreign banks). A few virtual banks are included in the sample.

A total of 135 banks from 27 EU countries and Norway⁹ were subject to monitoring.

Table 1 – Distribution of banks per country, EU27 and Norway

A T	B E	B G	C Y	C Z	D E	D K	E E	E S	F I	F R	G R	H U	I E	I T	L V	L T	L U	M T	N L	N O	P L	P T	R O	S E	S I	S K	U K
5	5	5	3	5	5	5	4	5	5	6	5	5	4	5	5	4	4	4	5	5	5	5	5	5	5	5	6

Additionally, National Banking Associations' websites were visited. Those websites serve as ancillary data source for the purposes of our analysis.

Availability of information on bank switching service

Availability of information in both local languages, and English where available, was checked. As local language websites constitute the main source of information at national level, English was only used for the purposes of information collection and not analysis. Most of the time English version of the bank websites features only a limited amount of information.

Actual accessibility - easiness to find the information

Here we attempted to behave as an average consumer who wants to switch his/her bank account and who is a priori unaware of the existence of a switching service. This criterion is particularly significant: if several buttons have to be clicked or search engines must be used to find the information needed, the utility of this information for an uninformed consumer may be questioned. For example, on the website of BGL BNP Paribas Luxembourg the information could not be found without using a search engine¹⁰.

⁹ It was decided to include Norwegian banks in the sample as the banks' switching code in this country entered into force in 2008.

¹⁰ BGL BNP Paribas Luxembourg:

Completeness and clarity of information

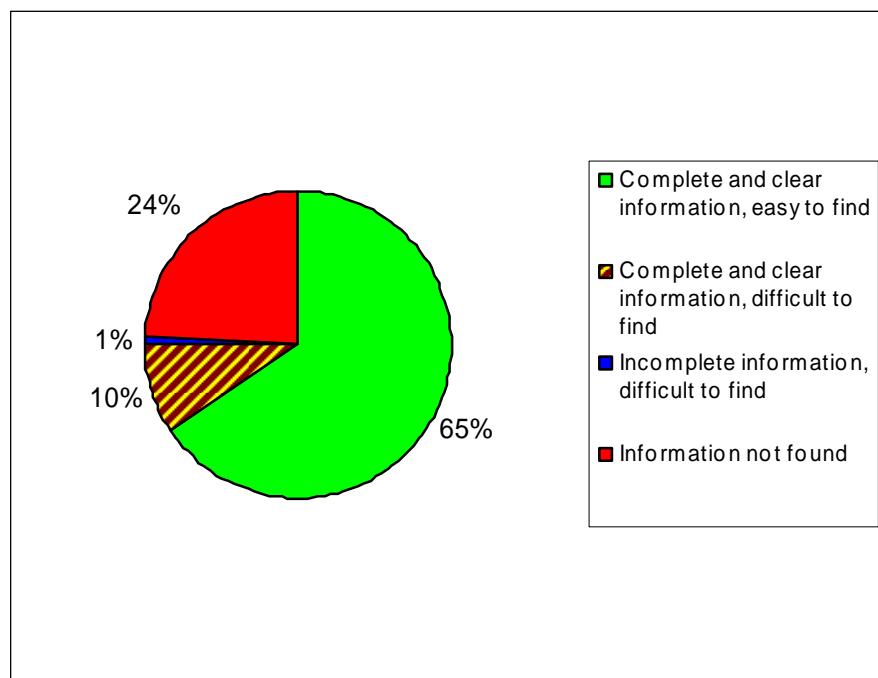
Here again we attempted to get under the skin of an average consumer who wants to switch his/her bank account and who is a priori unaware of the existence of a switching service. For instance, the consumer willing to switch his/her bank account may not be aware of the CP provision which gives the leading role in the switching process to the 'new' bank or provisions providing that consumers are offered a user guide and a set of letters to inform their creditors and debtors on their new bank account number. Thus, in checking the bank websites, we paid particular attention to the quality and content of information accessible to consumers. Concretely, after having read the switching information on the bank website, the consumer must know how to proceed, i.e. contact the new bank or the current bank, print and fill the switching form, etc. In that sense, it is not the amount of available information which is decisive, but its clarity and completeness. For example, information such as "switch to us, we will do what is necessary to transfer your account from your current bank", should be sufficient so that the consumer gets in touch with the bank where he wishes to switch his current account, but is not considered as complete information.

2.2 Findings

The detailed results of the bank websites check can be found in annex 1.

It should be reminded that in a number of countries switching codes or services have existed prior to the CP. Given that the CP are based on a minimum harmonisation approach, the already existing codes have been continued. This is the case in the UK, the Netherlands, Italy, Ireland and Norway. Besides, the switching services in the Netherlands and Ireland are considered satisfactory by the national consumer organisations based on the assessment of the number of consumers that used the service to switch their current account to another bank.

Graph 1 – Availability of information on bank account switching on the banks' websites, EU27 and Norway, November 2010



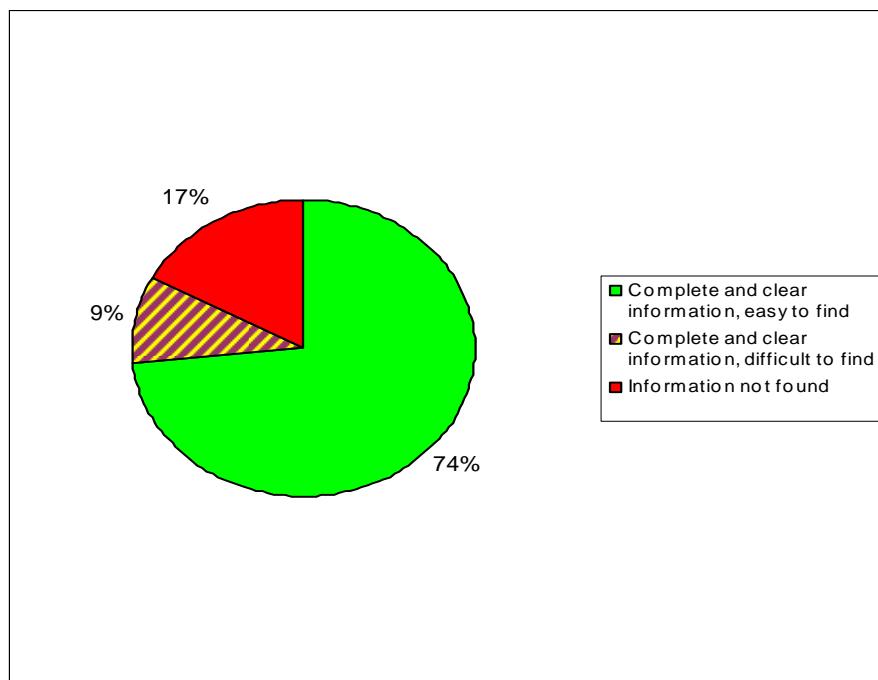
- The overall compliance rate in EU27 plus Norway was 65%, i.e. 89 out of 135 bank websites provided complete, clear and easy to find switching information. Those websites explain the switching service in a consumer friendly way. Most of them also provide a link to the CP as adopted by the national banking associations, e.g. BNP Paribas (FR), Citibank Belgium (BE) and Millennium bcp (PT);
- In 10% (13 banks) of cases the information was difficult to find, i.e. the information was not located in a logical place on the website and the use of a search engine was needed to find it, e.g. Volksbank Ceska Republica (CZ), Allianz Bank SA (PL), DNB Nor (NO)¹¹, Banca Popolare di Milano (IT);
- In 24% of cases (32 banks) switching information was not found, e.g. Deutsche Bank (DE), BBVA and Santander (ES), Ukio Bankas (LT), DSK Bank (BG) and BCR (RO). It is recalled that information which is difficult to find gives the same result as the absence of information.

An interesting finding was the difference in compliance rates between May and November 2010: in May, only 66 bank websites (48%) were found to provide complete, clear and easy to find switching information.

¹¹ Our Norwegian member conducted an additional monitoring of bank websites in January 2011. Only 4 bank providers where found to include information regarding switching on their website in a test of main websites belonging to 17 banking service providers, including the 10 largest in terms of market share.

Another interesting observation is that websites of some of the largest banks in some countries fail to inform consumers about the switching service, e.g. Deutsche Bank (Germany), OTP (Hungary), Banco Santander and BBVA (Spain). However, in Spain, largest banks do not constitute an exception given the fact that no surveyed bank website in this country appeared to provide switching information. Curiously, in the UK, Santander offers £100 and a starting credit interest rate of 5% to those who switch their main current account to Santander¹².

Graph 2 – Availability of information on bank account switching on the banks' websites, EU15 (old MSs), November 2010

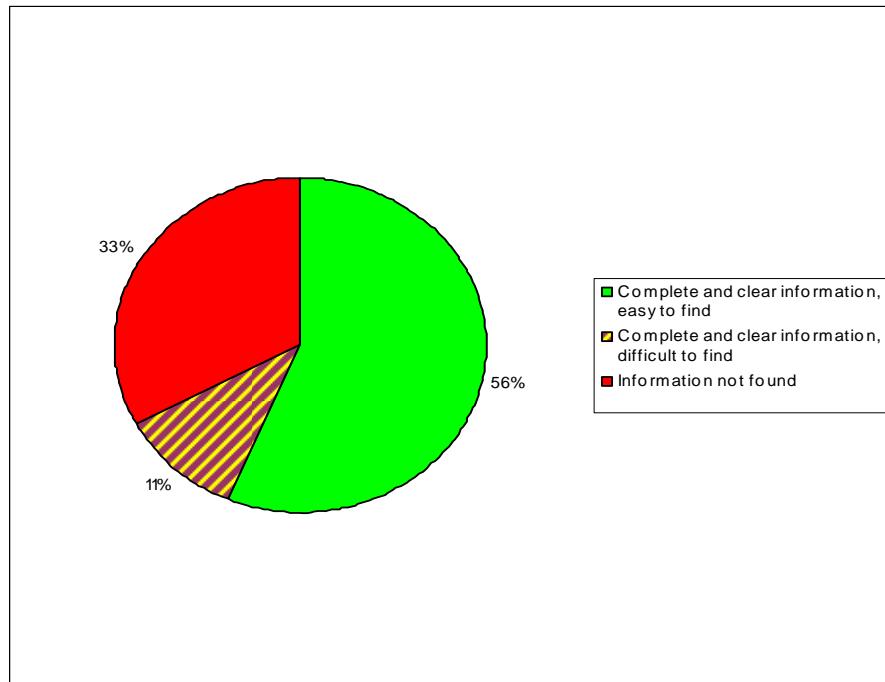


It appears of interest to observe the contrast between bank websites in the old and recent Member States (graphs 2 and 3). Overall, banks in the EU15 (old Member States) do much better than those in the EU12 (recent Member States). For the EU15, a compliance rate of 80% was observed: on 60 visited websites, complete and clear information was easily found. The Netherlands, the UK, Ireland, Denmark and France do particularly well. It is worth reiterating here that in all these countries (except France) the switching code was already in place before the CP. Although in Italy the switching service developed by Patti Chiari has been in place since 2006, bank websites merely provide a link to Patti Chiari website without either mentioning or explaining the service. Thus, consumers who are unfamiliar with Patti Chiari would be unable to find the switching information. Spain clearly lags behind: virtually no bank websites visited provide the information on switching.

¹² Banco Santander UK webpage:
http://www.santander-products.co.uk/banking/switch/default.html?urlgen=y&exp=60&cm_mmc=sanomg_-aff_-eco17870005434109999omggeneric_-omggeneric

As to the EU12 Member States, the results are much poorer: only 56% of banks (31 banks) visited appear to offer complete, clear and easy to find information. Only Slovenian banks have gotten a perfect score. The Czech Republic, Poland, Malta and Slovakia do relatively well, whereas the situation is worse in Bulgaria, Romania, Lithuania, Latvia, Estonia and Cyprus.

Graph 3 – Availability of information on bank account switching on the banks' websites, EU12 (recent MSs), November 2010

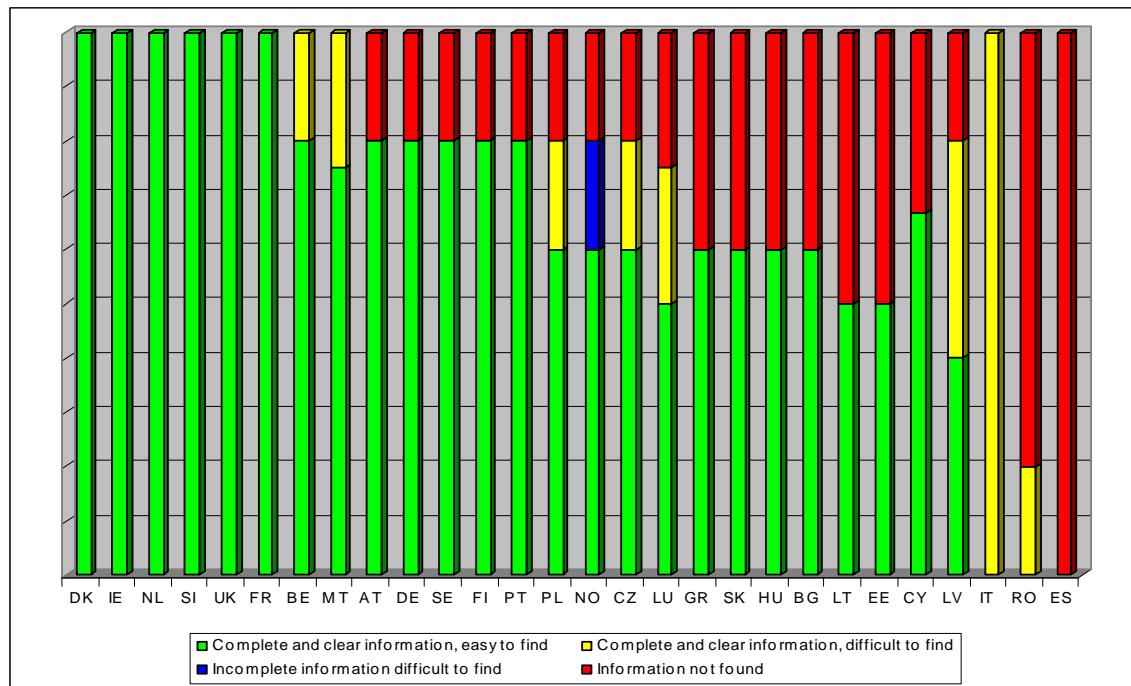


Finally, the country ranking according to the availability of information on bank account switching on the banks' websites can be found in the table below (table 2). Best performers, middle performers and laggards can be identified. The same data is presented also graphically, with the better-performing countries being situated on the left (graph 4).

Table 2 – Country ranking according to the availability of information on bank account switching on the banks' websites, EU27 and Norway, November 2010

Country rank	Countries	Number of bank websites visited	Complete and clear information, easy to find	Complete and clear information, difficult to find	Incomplete information difficult to find	Information not found
1	Denmark	5	5			
1	Ireland	4	4			
1	Netherlands	5	5			
1	Slovenia	5	5			
1	UK	6	6			
1	France	6	6			
2	Belgium	5	4	1		
2	Malta	4	3	1		
3	Austria	5	4			1
3	Germany	5	4			1
3	Sweden	5	4			1
3	Finland	5	4			1
3	Portugal	5	4			1
4	Poland	5	3	1		1
4	Norway	5	3		1	1
4	Czech Rep.	5	3	1		1
4	Luxembourg	4	2	1		1
5	Greece	5	3			2
5	Slovakia	5	3			2
5	Hungary	5	3			2
5	Bulgaria	5	3			2
5	Lithuania	4	2			2
5	Estonia	4	2			2
5	Cyprus	3	2			1
6	Latvia	5	2	2		1
7	Italy	5		5		
7	Romania	5		1		4
8	Spain	5				5
	Total	135	89	13	1	32

Graph 3 - Availability of information on bank account switching on the banks' websites per country, EU27 and Norway, November 2010



As to the websites of national banking associations, almost all of them provide information on the switching code. The information provided on the association website is of course not addressed to the consumer. This data is useful for showing that retail banks through their national associations have taken the commitment to facilitate switching of current bank accounts.

3. Consumer testimonies

Collecting consumer testimonies about their recent experience in switching bank accounts comprised the second step in monitoring the CP. The aim was to obtain information about consumer experience with regard to the switching process.

Six BEUC members took part in this exercise: Test-Achats/Test-Aankoop (Belgium), the Danish Consumer Council (Denmark), the Czech Association of consumers TEST (the Czech Republic), VKI (Austria), ZPS (Slovenia) and CECU (Spain).

Some BEUC members have reported their satisfaction with the functioning of the account switching service that have already existed prior to the implementation of the CP (the Netherlands and Ireland). Thus, it was not necessary to launch a more detailed monitoring in those countries.

3.1 Methodology

Consumer testimonies were collected using a standard questionnaire template (see annex 2) that was published on BEUC members' websites during the period between May and August 2010 and was accessible to all consumers. CECU (Spain) used a shorter version of the questionnaire.

Consumers were asked a number of questions with regard to:

- The extent of their relationship with the 'former' bank, i.e. number of products purchased;
- The name of both the 'former' and 'new' banks;
- The reasons for switching to a 'new' bank;
- The information on the switching process provided by the 'new' bank without the consumer's request;
- The easiness and speed of the switching process;
- Additional comments were made by the respondents where relevant.

3.2 Country findings

Denmark

In Denmark, no other initiative on bank account switching existed prior to adoption of the CP. A total of 95 consumers provided testimonies regarding their recent switching experience (see annex 3). Here are some key figures reported by the respondents:

- 31% (29 respondents) of consumers switched their current account because they were dissatisfied with the cost of their current account.
- 17% (16) continued to use both the old and new account (multi-banking);
- 26% (25) did not receive any explanation/brochure on the switching service from the 'new' bank;
- 19% (18) stayed with their 'old' bank more than 25 years;
- 25% (24) and 23% (22) of consumers switched from large banks such as Danske Bank and Nordea respectively, whilst these same banks gained 9% (8) and 10% (9) of switchers respectively.

Feedback received from the Danish Consumer Council suggests that overall, Danish banks do well. It appears that switching bank accounts is not a problem and consumers can easily switch from one bank to another. This information is in line with the findings from the bank website monitoring exercise: all monitored bank websites in Denmark provide complete, clear and easy to find information on switching. Yet, a considerable number of respondents to the questionnaire did not receive any information on switching from their new bank.

Spain

52 consumers replied to the questionnaire (see annex 4). Here are some appealing figures:

- 40% (21 respondents) switched to another bank because they were dissatisfied with the cost of their current account;
- 25% (13) hesitated a long time to switch because of perceived difficulties in the switching process;
- 48% (25) said they did not receive much help by the 'new' bank during switching;
- 17% (9) of those who switched consider that switching a current account is complicated, while almost 22% said the process was easy;
- 17% (9) state that switching process is slow;
- Another 10% (5) consider that switching is expensive, while 18% said switching is inexpensive.

It should be noted that the Spanish banks are 'the lanterne rouge' of the EU ranking according to the availability of information on bank account switching on the bank websites (see page 13).

Belgium

A total of 199 consumers filled the questionnaire (see annex 5). According to the responses:

- 61% (123 respondents) left their 'former' bank because they were dissatisfied with the cost of account;
- 55% (110) hesitated a long time to switch their current account because of many steps to take (administrative burden);
- 80% (160) said when they expressed their intention to transfer the account the staff at the 'new' bank neither spontaneously evoked the interbank mobility service nor explained the functioning of the service;
- 28% (56) were not much helped by their 'new' bank during the switching;
- Additional comments of 19 respondents report problems related to the transfer of direct debits (and/or incoming credit transfers) from the former account to the new one. Those problems caused undue delay in payment of social benefits and pensions;
- 18% (35) consider that switching a current account is not easy, while 46% (92) think the opposite;
- 24% (48) said switching is not fast;
- 73% (145) said switching is inexpensive while 12% (25) think it is inexpensive;
- 28% (56) of respondents stayed with their 'former' bank more than 25 years;

- BNP Paribas Fortis and Dexia lost 34% (67 respondents) and 24% (47) respectively; BPO (Banque de La Poste) and ING lost 21 customers each. On the other side, 20% (39) and 36% (72) of respondents switched to Argenta and Deutsche Bank¹³ respectively.

The above figures suggest that most consumers are not informed at all or poorly informed about the switching service. Further, many consumers who switched are not satisfied with the cost and rapidity of the switching process. Also, some respondents reported their hesitation to switch since their current account was linked to a loan/investment.

Austria

89 consumers who have recently switched their current account replied to the questionnaire (see annex 6). Below are some key figures:

- 63% (56 respondents) switched because they were dissatisfied with the cost of their 'former' account;
- 56% (50) did not receive any explanation/brochure on the switching service from the 'new' bank;
- 68.5% (61) said when they expressed their intention to transfer the account the staff at the 'new' bank neither spontaneously evoked the interbank mobility service nor explained the functioning of the service;
- 66 % (59) feel they were much helped by their 'new' bank during the switching;
- 45% (40) consider that switching is easy, while 17% (15) took the opposite view;
- Switching is slow according to 28% (25) of respondents;
- Switching is inexpensive for 44% (39) of respondents, and is expensive for 13.5% (12);
- 10% (9) owned their 'former' account for more than 25 years;
- 22.5% (20) and 26% (23) switched from Bank Austria and BAWAG/PSK respectively. On the other side, 38% (34) and 19% (17) switched to Easybank and Sonstige.

The above data suggests that some improvements are still needed in order to enhance consumer satisfaction. While there are signs of an easier switching mechanism, the aspects such as information provided to consumers, rapidity and cost of switching would need to be better addressed.

¹³ No respondent stated to have switched from Deutsche Bank.

Slovenia

Testimonies from 32 consumers were collected (see annex 7):

- 56% (18 respondents) switched because they were dissatisfied with the costs of bank accounts;
- 25% (8) did not receive any explanation/brochure on the switching service from the 'new' bank;
- 28% (9) reported that switching a bank account is partly easy, fast and inexpensive;
- 10% (3) reported that switching is difficult, slow and expensive;
- About 60% of all respondents (19) switched their bank account from Nova Ljubljanska Bank (NLB), while 31% (10) switched to Banka Sparkasse.

The Czech Republic

A total of 22 consumers who have recently switched their current accounts participated in the survey (see annex 8). However, it proved impossible to collect consumer testimonies about the account switching as only 2 respondents switched their accounts using the switching service. It appears that in the Czech Republic, only banks who are members of the Czech Banking Association feel committed to the CP. Thus, 82% of respondents (18 persons) moved to the banks which are not members of the Czech Banking Association and therefore have not adopted the CP: one bank is a branch of Polish BRE bank and the second one, FIO, is a cooperative bank. One consumer switched to a German bank, which is not a signatory to the CP either. One switch occurred between two brands of one single bank.

3.3 Analysis of findings

The above testimonies provided some interesting insight on consumers' account switching experience as well as on their relationships with banks. For example, across Europe, many consumers stay with the same bank for many years. Different reasons may cause this 'everlasting' relationship, e.g. consumer unawareness of actual costs due to complex nature and presentation of bank tariffs, impossibility to compare tariffs of different banks (linked to the previous reason), tying and bundling, behavioural biases or high level of consumer satisfaction.

Further, data on consumers who are dissatisfied with the cost of their current account is a useful measure of consumer satisfaction. We have found that a considerable number of consumers in Denmark, Belgium, Slovenia, Austria and Spain left their 'former' bank due to high costs of their current account.

Data on cost and rapidity of switching are equally valuable in so far as these aspects play an important role in the consumer decision to switch or not to another bank. High costs and long delay of switching deter consumers from switching. Consumer data suggests that in Spain, Slovenia and Belgium some switchers are dissatisfied with switching costs and delay.

Provision of switching information to consumers and/or help provided by bank staff during the switch are among common issues reported by consumers in virtually all monitored countries.

Finally, it seems evident that the CP have not ensured full coverage across Europe. Its adoption is in some cases conditional on the bank's membership with the National Banking Association (e.g. the Czech Republic).

4. Mystery shopping

Mystery shopping exercises constituted the third step in our monitoring exercise. Carrying out mystery shopping requires considerable financial and human resources which are not affordable by most national consumer associations. Only four national consumer associations decided to perform this task, namely Test-Achats/Test-Aankoop (Belgium), VKI (Austria), UFC-Que Choisir (France) and ZPS (Slovenia).

4.1. Methodology

Mystery shopping exercises were carried out differently in different countries. In two countries (Austria and Belgium), mystery shoppers opened current accounts at different banks. Later on, they tried to switch their accounts to another bank. In two other countries (Slovenia and France), mystery shopping was done without opening bank accounts. In these countries mystery shoppers collected information on the switching procedure from the information brochures available at bank branches and by asking relevant questions to bank staff. In all cases mystery shoppers behaved like average consumers who have not necessarily knowledge of the account switching service. The following aspects were subject to monitoring: level of information provided to consumers, cost and rapidity of switching, and possible problems incurred when switching the account.

4.2. Country findings

Austria

Current accounts were opened in November 2009 by VKI staff with seven banks in the Vienna area (one account per bank): Bank Austria, BAWAG, Erste Bank, easybank, Hypo NÖ, Raiffeisenlandesbank NÖ-Wien and Volksbank Wien. The amount of 400 Euros was deposited and one direct debit and one recurrent credit transfer was established on each bank account. At the end of January/beginning of February 2010 mystery shoppers switched to another bank. The following feedbacks were received from mystery shoppers (see annex 9):

- The duration of the switch varied from 4 to 21 days while the CP provisions state 7 days once the new bank received all necessary information.
- Closure of the 'former' bank account was in general free of charges. Only when the final account statement was sent to the consumer by post, a charge applied (€ 0.55).
- Main concerns relate to direct debit: banks could not guarantee to mystery shoppers that no direct debit will be omitted during the switch. According to VKI, it can result in additional charges for consumers. Therefore, VKI advises consumers to take steps to inform creditors¹⁴.

¹⁴ According to a recent survey, a similar concern was raised by many British consumers: 27% of the respondents (nearly one million consumers) to the questionnaire said direct debit payments had

Belgium

It is worth noting that in 2004 Febelfin (Belgian Financial Sector Federation) had already put in place a guide to help consumers switch their bank account. It was in the form of a checklist of all the steps to undertake to transfer a bank account and a number of sample letters. The initiative proved to be a failure due to low level of consumer awareness and administrative burden for consumers¹⁵.

Mystery shopping was done between May and July 2010 (see annex 10). Bank accounts opened by Test-Achats/Test-Aankoop staff in seven banks (one account per bank) were switched according to the below schema. One direct debit was established on each bank account:

- From Dexia to Argenta
- Dexia → ING
- ING → Dexia
- BNP Paribas Fortis → Deutsche Bank
- ING → BNP Paribas Fortis
- KBC → Rabobank
- Dexia → KBC

Mystery shoppers were instructed to go to the 'new' bank and express their intention to switch. Then, they observed the reaction of the 'new' bank: spontaneous mentioning of the switching service, delivery of the information brochure, particular questions with regard to account transfer, invitation to sign the switching request, etc.

Presented below are the results reported by mystery shoppers.

BNP Paribas Fortis: The bank employee did not know at all how to transfer an account. The client had to insist so that the employee inquired. Other employees said the client had to take necessary steps at the 'former' bank. Only at the client's insistence the employee contacted his colleagues and after 20 minutes found the switching form.

Deutsche Bank: The employee was quite aware of the switching procedure and completed the correct switching form. The client was informed that switching should be effective within maximum 18 days.

KBC: The client had downloaded the switching document from KBC website and had completed it with his account number at Dexia. The bank employee first said that the document must be submitted to the 'former' bank (Dexia). At the client's insistence, the employee took charge of the switching procedure.

gone wrong when the mandate was transferred to the new account "Stick or twist? - An analysis of consumer behaviour in the personal current account market", Consumer Focus, October 2010: <http://www.consumerfocus.org.uk/publications/stick-or-twist>

¹⁵ Test-Achats website: <http://www.test-achats.be/argent-et-assurances/code-de-conduite-relatif-a-la-mobilite-interbancaire-oui-mais-s622963.htm>

Rabobank: After having contacted the bank's call centre, the client opened an online account, downloaded the switching form and joined a copy of identity card and a copy of an invoice with the postal address indicated on it. The call centre employee was quite familiar with the switching procedure.

Argenta: The bank employee spontaneously spoke about the switching service. The client was given an explanation and switching was handled by the bank employee.

Dexia: First, the bank employee declared that the switching process is automatic and asked the client to fill in the switching form and indicate when the 'former' account should be closed. When the client gave a hint on the correct switching procedure, a better informed bank employee explained the procedure and then everything went well.

ING: Two bank employees tried to help the client but none of them was aware of the switching service. Only with the client's help they found the right switching form, but did not know how to proceed with it. They asked the client to sign an empty form (supposedly to be able to fill it in later with help of better informed colleagues). They constantly tried to divert the subject asking irrelevant questions to the client on his employer, salary and even tried to sell a life insurance. The client was never contacted by ING afterwards. He learned from his account statement received from the 'former' bank (Dexia) that his account balance had been transferred on a new account opened with ING. As the client was never contacted by ING, he did not even know his new account details.

France

A total of 1746 bank branches throughout France were visited between 15 June and 11 September 2010. The following results were obtained by mystery shoppers¹⁶:

- Information brochures on the switching service were found in only 14% of bank branches.
- When the clients announced their wish to switch bank accounts, only 35.5% of bank employees spontaneously mentioned the switching service.
- 39% of bank employees answered positively the question on whether the bank takes care of contacting third parties to switch direct debits from the 'former' to the 'new' account, while 26% said the client had to take care of everything; 6% of employees did not provide any answer, which suggests lack of training of bank employees with regard to the account switching service.
- 60% of bank employees said the client had to contact the 'former' bank to collect information to identify standing orders for credit transfers and available direct debit mandates on the 'former' account, i.e. the clients were not offered the possibility to choose the 'new' bank as their Primary Contact Point.
- Answering the question on total delay of switching, 41% of bank employees said it would take more than one month, whilst the CP provide for a maximum period of 14 banking working days.

¹⁶ For more information, see UFC-Que Choisir study "Tarifs et mobilité bancaires: Le désolant palmarès des banques", October 2010:
<http://www.quechoisir.org/media/fichiers/etudes/telecharger-l-etude-complete-tarifs-et-mobilite-bancaires-le-desolant-palmares-des-banques>

Slovenia

In January 2010 mystery shoppers visited 16 banks and 2 savings banks which have branches in Ljubljana¹⁷ (see annex 11). First, they checked the availability of written switching information such as information leaflets or brochures. Then, information was gathered in person from bank employees. The following results were obtained:

- 6 banks did not have switching brochures. When available, the brochures were usually placed somewhere behind and were difficult to find.
- None of the banks had the switching form available on information stand.
- When the client expressed the wish to open a bank account, only 8 banks mentioned the switching service.
- Once the client mentioned the switching service, 9 banks provided the switching form.
- In some cases employees at the counter were not informed about the switching service. In these cases, the client had to take an appointment with a 'bank adviser' to obtain this information. It happened also that bank advisers did not mention the switching service until the client explicitly asked about it.
- When talking about the bank switching service bank employees mostly advised not to use it because it usually takes longer than when the client takes action by himself. According to them, the 'former' bank delays sending the necessary information to the 'new' bank, which slows down the switching process.
- Foreign banks tended to be more consumer-friendly and provided the clients with more information on the switching service.

4.3 Analysis of findings

Many parallels can be drawn between different national experiences. Thus, most mystery shoppers reported similar problems when trying to switch bank accounts.

First, publicly accessible switching information is often missing at the bank branches. Consumers have to ask the bank staff, which is not helpful especially to those consumers who are unaware of the switching service.

Second, it is obvious that in many cases the bank staff is uninformed and/or insufficiently trained with regard to the switching service. This evidence was established by mystery shoppers in bank branches in Belgium, Slovenia, Austria and France. As a result, consumers are often misled (perhaps unintentionally) by bank staff and do not receive appropriate switching information and help from the bank staff.

Third, switching delays do not always comply with the provisions of the CP, i.e. they can be longer, as acknowledged by bank staff in Slovenia and France.

¹⁷ The following banks in Slovenia were visited: Abanka Vipa, Banka Celje, Banka Koper, Banka Sparkasse, BKS Bank AG, Delavska hranilnica, Deželna banka Slovenije, Gorenjska banka, Hranilnica Lon, Hypo Alpe-Adria-Bank, NLB, Nova KBM, Poštna banka Slovenije, Probanka, Raiffeisen banka, SKB banka, Unicredit banka, Banka Volksbank.

5. Conclusions and recommendations

5.1 Conclusions

The CP set out banks' responsibilities with regard to facilitating the switch of consumer current accounts between banks. Banks must provide consumers with switching guides and carry out the necessary tasks to switch the account if the consumer wishes so (Primary Contact Point). Yet, BEUC's monitoring exercise brought to light a multitude of shortcomings as to the banks' compliance with their commitments.

Consumer information: Appropriate consumer information is an important ingredient to make consumers benefit from the bank mobility service. However, many banks across Europe do not promote the CP and fail to inform consumers about the switching service. This is particularly true for recent Member States and Spain. While dissemination of information throughout all bank branches can take some time, uploading information on a website can be done rapidly. All banks should have provided information on their website.

On the other hand, consumer testimonies and mystery shopping showed that information brochures are not always provided to consumers at bank branches either. Furthermore, in many bank branches across Europe the bank staff was found to be unaware of the switching service.

The switching process: Both consumer testimonies and feedback provided by mystery shoppers indicate lack of bank staff awareness of the switching service, and long switching delays. Further, it seems that problems exist in relation to the transfer of direct debit mandates from the former bank account to the new one (see testimonies provided by Belgian consumers, as well as mystery shopping in Austria and the UK).

More generally, it is clear that the commitment of banks to implement their own code of conduct varies heavily among the different banking communities across Europe. While some communities have shown efforts to comply with commitments taken, for some others this self-regulation does not result in behavioural change. In our opinion, this is a problem inherent to the nature of self-regulation. Contrary to binding regulation, no sanctions are foreseen for non-compliance with the self-regulatory codes of conducts such as these CP. We believe this fundamental shortcoming of self-regulation is illustrated by the questionable commitment of banks to implement the provisions of the CP in many Member States.

5.2 Recommendations

Based on the above findings, below are a number of recommendations, specific to bank account switching, which should be implemented if BEUC's conclusions (in particular low staff awareness of the new rules, missing information on banks' websites and persisting problems in the switching process) are confirmed by the European Commission's own monitoring report of the CP expected by the end of 2011. A further set of recommendations are about bank mobility in general and are based on BEUC's current work on various retail financial services issues. They raise in particular the issue of how to factually improve consumer mobility in relation to current bank accounts.

Recommendations specific to switching services

- ***Provide better training of bank staff.*** Consumer experience in relation to bank account switching depends on the quality of staff of any particular bank branch, whilst all banks must equally comply with the CP. Accordingly, better training of bank staff would benefit banks and reduce the random variable that impacts consumer switching experience, and more generally, the relationship between banks and their customers. This should have been given priority by the bank sector, as smooth implementation of the CP needs the involvement of bank staff. Therefore, this should be considered now as a top priority in the follow up and monitoring of the CP.
- ***Put in place an automatic re-routing system.*** An interim solution to remedy the problem of transferring direct debit mandates from the 'former' bank to the 'new' bank would be the model adopted in the Netherlands in 2003: during 13 months all direct debits and credit transfers destined for the old account are automatically re-routed to the new account through the clearing house¹⁸. Such a system would prevent the occurrence of errors during the switch. Besides that, nowadays in countries where the CMF (creditor-driven mandate flow) mandate management model exists, the debtor's bank does not have access to mandate-related data, making the communication of this information between the 'former' bank and the 'new' bank very difficult, even impossible (e.g. Germany). The European Commission proposal for a Regulation on end-dates for migration to SEPA credit transfers and direct debits provides that mandate-related information shall be transmitted from the creditor's bank to the debtor's bank with each direct debit transaction¹⁹. It is therefore important that the Commission proposal on SEPA be adopted.
- ***Set up account number portability.*** This would be a logical next step towards facilitating account switching. An important aspect that may deter consumers from switching is the necessity to communicate the new account details to third parties. Even though the 'new' bank can handle this task instead of the consumer, errors take place quite often. In our view, setting up account number portability would be a long-term, sustainable solution. The argument on technical impossibility of this project is not valid, as has been proven in the mobile phone sector.
- ***Set a deadline for the closure of the 'former' account.*** The problem related to the closure of the 'former' account has been reported by many Italian consumers (see annex 12). In those cases, not only is the positive account balance not transferred to the 'new' account on time, but the consumer is also required to pay unjustified account management fees. Therefore, a binding deadline should be set to oblige the 'former' bank to rapidly close the account and to transfer any available positive account balance to the 'new' account.

¹⁸ The Dutch Interbank Switching Support Service (Overstapservice):
http://customerworld.typepad.com/swami_weblog/files/bankportability.pdf

¹⁹ Technical requirements: 3(b) of Annex of the Commission proposal.

- **Ensure proper enforcement and supervision.** Should the CP be continued, compliance with it should be ensured by public authorities. Otherwise, in the absence of a binding compliance mechanism the risk of failure of the CP in the long run is considerable. Banks must actively promote the CP in order to increase consumer awareness. For example, information on the switching service could feature on the account statements sent to consumers. Penalties must be imposed on banks which do not respect the CP.
- **Adopt binding legislation on switching.** This report confirms that self-regulation, when not properly designed, suffers a crucial shortcoming compared to binding legislation. Given the fact that non-compliance with legislation would not be tolerated as is the case with non-binding codes of conduct, legislation is the most appropriate way of addressing the issue of bank account switching. Therefore, we strongly suggest to the Commission to envisage, where the above mentioned features cannot flow spontaneously from the application of the CP, to prepare a regulatory tool that addresses the different elements of consumer bank mobility.

Recommendations for an increased bank mobility

- **Ensure proper understanding and comparability of bank fees.** Clarity and comparability of bank account fees is a necessary pre-condition that would allow consumers to compare bank fees and to opt for better deals. The European Commission has recently invited EBIC (the European Banking Industry Committee) to identify and implement appropriate solutions to ensure proper understanding and comparability of bank fees. Despite our scepticism with regard to the effectiveness of self-regulation, we believe the Commission initiative is a move in the right direction.
- **Address the issue of unfair commercial practices.** Tying and other similar practices are an important impediment to personal current account switching in so far as they can raise the switching costs. Following the study on "Tying and other potentially unfair commercial practices in the retail financial service sector"²⁰, the public consultation and workshop dedicated to this issue, we call on the European Commission to pursue its actions in that respect and to come forward with legislative proposals.

²⁰

Tying and other potentially unfair commercial practices in the retail financial service sector", EC study, November 2009: http://ec.europa.eu/internal_market/consultations/2010/tying_en.htm

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ANNEX 1

BANK WEBSITE MONITORING

(Date: 24/26 November 2010)

Austria



Banks	Information about account switching	Bank website	Comments
Bank Austria	Complete and clear information, easy to find	http://www.bankaustralia.at/de/open.html?opencf=/de/menu-de.html	
Erste Bank	Complete and clear information, easy to find	https://www.sparkasse.at/sPortal/sportal.portal?w_webc_url=Channels/Konto_-_Karten/Strukturcontents/pk_kontowechsel_pg_Cont.akp&desk=sparkasseat_de_0198&menu_isContentInMaster=TRUE&VERITYINDEXERTASK=true	
Hypo NÖ	Complete and clear information, easy to find	http://www.hypolandesbank.at/htdocs/index.html	
Volksbank Wien	Complete and clear information, easy to find	http://www.volksbank.at/m101/volksbank/zib/de/formular/kontaktformulare/bankwechsel.jsp?menu1=1&locincl=/&loclink=/m101/volksbank/zib&bc=link	
Raiffeisen	Information not found	www.raiffeisen.at	
Austrian Bankers' Association	Information not found	www.voebb.at	

Belgium



Banks	Information about account switching	Bank website	Comments
KBC	Complete and clear information, easy to find	https://www.kbc.be/IPA/D9e01/~F/~KBC/~BZKH0OQ/actualites/paiements/?news_file=KBC/PART/LENEN/LOCAL/idc_BET_NWS_bankovers_tapdienst_start_02112009_F_0900dfde80587874.xml&NgDestUri=%3Ft%3D/BZKC073/BZKH0OQ	
BNP Fortis	Complete and clear information, easy to find	https://www.fortisbanking.be/portal/start.asp	
Citibank Belgium	Complete and clear information, easy to find	http://www.citibank.be/files/mobility.asp?lang=fr	
ING	Complete and clear information, difficult to find	http://www.ing.be/private/showdoc.jsp?docid=418981_FR	Search engine used to find the information on switching
DEXIA	Complete and clear information, easy to find	www.dexia.be	
Belgian Financial Sector Federation (Febelfin)	Complete and clear information	http://www.febelfin.be/export/sites/default/febelfin/pdf/mobilite/switting_selfregulation_fr.pdf	Code de conduite relatif au service de mobilité interbancaire

Bulgaria



Banks	Information about account switching	Bank website	Comments
UniCredit Bulbank	Complete and clear information, easy to find	http://www.unicreditbulbank.bg/bg/Individual_Clients/Current_Accounts/index.htm	
Central Cooperative Bank	Complete and clear information, easy to find	http://www.ccbank.bg/bg/prehvarqne_smetki_duga_bank	
Municipal Bank	Complete and clear information, easy to find	http://www.municipalbank.bg/?page=individ_18	
Piraeus Bank	Information not found	http://www.piraeusbank.bg/ecpage.asp?id=233246&nt=19	Link to switching information does not work
DSK Bank	Information not found	https://dskbank.bg	
Association of Banks in Bulgaria	Complete and clear information	http://www.abanksb.bg/transferaccEn.html	Agreement on Personal Current Account Switching

Cyprus



Banks	Information about account switching	Bank website	Comments
Hellenic Bank	Complete and clear information, easy to find	http://www.hellenicbank.com/HB/content/gr/content_list1.jsp?topic=Services/Rates&lang=qrhttp://www.hellenicbank.com/HB/content/gr/content.jsp?id=2447&lang=qrhttp://www.hellenicbank.com/document/2447/CODE%20METAFORAS.pdf	
Bank of Cyprus	Information not found	www.bankofcyprus.com/	
Societe Generale Cyprus	Complete and clear information, easy to find	http://www.sgcyprus.com/images/media/mediafile03/CODE%20METAFORAS2.pdf	
Association of Cyprus Banks	Complete and clear information	http://www.acb.com.cy/cqibin/hweb?-A=166&-V=codes	Code of Practice on Switching Personal Accounts

The Czech Republic



Banks	Information about account switching	Bank website	Comments
Volksbank Ceska Republica	Complete and clear information, difficult to find	http://www.volksbank.cz/vb/jnp/cz/o_bance/cz-o_bance-pristup_ke_klientum-kodex_mobilita.html	Search engine used to find the information on switching
Komercki Banka	Complete and clear information, easy to find	http://www.kb.cz/cs/inf/customers/cba_code.shtml	
J & T Banka	Complete and clear information, easy to find	http://www.itbank.cz/cs/37888.html	Bank for wealthy customers
UniCredit Bank	Information not found	http://www.unicreditbank.cz/en/home.html	According to Czech Banking Association, this bank signed to the CP on 1.11.2009
GE Money	Complete and clear information, easy to find	http://www.gemoney.cz/ge/en/1/accounts/switch-banks	Switching service is offered to clients since 2007
Czech Banking Association	Complete and clear information	http://www.czech-ba.cz/aktivity/kodex-mobility-klientu	

Germany



Banks	Information about account switching	Bank website	Comments
Postbank	Complete and clear information, easy to find	http://www.postbank.de/-snm-0000595076-1265222856-0000022218-0000049030-1274792540-enm-privatkunden/kontowechselservice.html;jsessionid=08502EA92D3E9620FEE5C08B44E4024D9985.b122?hl=Kontowechsel	Bank switching service by on-line opening of new Postbank current account: on-line registration for bank switching service; managing all the addresses, which should be communicated during the switching process; checklist for help and bank switching assistant.
Commerzbank	Complete and clear information, easy to find	http://www.comdirect.de/pbl/cms/cms/services/pages/s3/website/anleitungen/kontowechsel/cori5040_se_anleitung_ktowechsel.html	Account statements of the previous account with standing orders and credits transferred by a Commerzbank employee; data transfer of written formalities through the Commerzbank and delivering the new bank connection for the payment partner; changing the standing orders; after the successful change the customer receives the statement back and a structure for the revised orders.
Berliner Sparkasse	Complete and clear information, easy to find	http://www.berliner-sparkasse.de/anzeigen.php?tpl=privatkunden/konten_karten/kontowechsel_leicht_gemacht/index.html&ref=x1272956061843:p&IFLBSERVERID=IF@@052@@IF	Free of charge switching of current accounts, cash or investment accounts to Sparkasse. Sparkasse takes care of all the steps.
Deutsche Bank	Information not found	www.deutsche-bank.de	
ING-DIBa	Complete and clear information, easy to find	https://www.ing-diba.de/girokonto/kundenservice/konto-eroeffnen/	After the account opening the customer receives a personal Service Map with all the appropriate information concerning bank switching.
Association of German Banks	Complete and clear information	http://www.bankenverband.de/themen/fachinformationen/retail-banking/kontowechsel-leicht-gemacht/?searchterm=kontowechsel	

Denmark



Banks	Information about account switching	Bank website	Comments
Danske Bank	Complete and clear information, easy to find	www.danskebank.com	Brochure, rules and regulation regarding bank switching, informative video displayed and most common Q&A's
Jyske Bank	Complete and clear information, easy to find	www.jyskebank.dk	Brochure, rules and regulation regarding bank switching and informative video displayed
Nordea	Complete and clear information, easy to find	www.nordea.dk	Brochure, rules and regulation regarding bank switching, informative video displayed and most common Q&A's
Arbejdernes Landsbank	Complete and clear information, easy to find	www.al-bank.dk	The option for switching informed, but only shortly, no official brochure, but easy access to further advice and information from the bank
Spar Bank	Complete and clear information, easy to find	www.sparbank.dk	Brochure, rules and regulation regarding bank switching easy accessible
The Danish Bankers Association	Complete and clear information	http://www.finansraadet.dk/bankkunde/oensker-du-at-skifte-bank.aspx	

Estonia



Banks	Information about account switching	Bank website	Comments
Swedbank (Hansabank)	Complete and clear information, easy to find	https://www.swedbank.ee/static/pdf/private/d2d/Tarbija_infoleht_est.pdf	
Äripank Tallinn	Information not found	http://www.tbb.ee/61eng.html	
Krediidipank	Complete and clear information, easy to find	http://www.krediidipank.ee/era/arveldus/Switching/index.html	
Nordea	Information not found	www.nordea.ee	
Estonian Banking Association	Complete and clear information	http://www.pangaliit.ee/arveldused/switching/	Common Principles for Bank Account Switching

Spain



Banks	Information about account switching	Bank website	Comments
Barclays	Information not found	www.barclays.es	
Citibank	Information not found	www.citi.com/spain	
Caja Madrid	Information not found	http://www.cajamadrid.es/CajaMadrid/Home/cruce/0,0,0,00.html	
BBVA	Information not found	https://www.bbva.es/TLBS/tlbs/esp/segmento/particulares/index.jsp	
Banco Santander	Information not found	https://www.bancosantander.es/cssa/Satellite?pagename=SantanderComercial/Page/SAN_Index	
Spanish Banking Association	Complete and clear information	http://www.aebanca.es/en/Deinter%C3%A9ssectorial/TrasladodeCuentasBancarias/index.htm	Common Principles for Account Switching

Finland



Banks	Information about account switching	Bank website	Comments
Nordea	Complete and clear information, easy to find	http://www.nordea.fi/Henkil%C3%B6asiakkaat/P%C3%A4ivitt%C3%A4iset+raha-asiat/Neuvola+p%C3%A4ivitt%C3%A4isist%C3%A4+raha-asioista/Tilin+ja+pankkiasiointi+siirto+Nordeaan/1409992.html	
OP	Complete and clear information, easy to find	https://www.op.fi/op?cid=151212502&srcpl=4	
Ålandsbanken	Complete and clear information, easy to find	http://www.alandsbanken.fi/info/content/fi/service/newcustomer/chan_gebank.html	
Handelsbanken	Information not found	www.handelsbanken.fi	
Tapiola	Complete and clear information, easy to find	www.tapiola.fi	Link to the website of the Federation of Finnish Financial Service
Federation of Finnish Financial Services	Complete and clear information	http://www.fkl.fi/www/page/fk_www_7952	

France



Banks	Information about account switching	Bank website	Comments
BNP Paribas	Complete and clear information, easy to find	http://www.bnpparibas.net/banque/portail/particulier/Fiche?type=fiche&identifiant=Quels_sont_nos_engagements_20081210055212	
La Banque Postale	Complete and clear information, easy to find	https://www.labanquepostale.fr/index/particuliers/au_quotidien/gestion_au_quotidien/service_accueil.En_detail.html	
CIC	Complete and clear information, easy to find	https://www.cic.fr/fr/banques/le-cic/devenir-client/particulier.html#I3	
Boursorama Banque	Complete and clear information, easy to find	http://www.boursorama.com/banque-en-ligne/compte-bancaire/changer-de-banque.html	Virtual bank
Credit Agricole	Complete and clear information, easy to find	http://www.credit-agricole.fr/particulier/quotidien/ouvrir-un-compte/assistance-a-domiciliation-bancaire.html	
Société Générale	Complete and clear information, easy to find	https://particuliers.societegenerale.fr/devenir_client/bienvenue.html	
French Banking Federation	Complete and clear information	http://www.fbf.fr/Web/internet/content_particuliers.nsf/(WebPageList)/Changer+de+banque++changer+de+compte++le+nouveau+dispositif+francais+sera+operationnel+en+novembre+2009+et+conforme+aux+principes+européens?Open	Le guide de la mobilité bancaire

Greece



Banks	Information about account switching	Bank website	Comments
ATE Bank	Information not found	http://www.atebank.gr/ATEBank/	
Alpha Bank	Complete and clear information, easy to find	http://www.alpha.gr/page/default.asp?la=1&id=7545	
Probank	Information not found	http://www.probank.gr/index.php	
Eurobank EFG	Complete and clear information, easy to find	http://admin.eurobank.gr/Uploads/pdf/KoinewArxesMetaforaTrapezikwnLog.pdf	
Millennium Bank	Complete and clear information, easy to find	http://www.millenniumbank.gr/MillenniumVB/MillenniumGR/TopMenu_1_GR/Individuals_GR/Deposits_GR/MetaforaTrapezikonLogariasmon_GR/	
Hellenic Bank Association	Complete and clear information	http://www.hba.gr/5Ekdosis/5-5kodikes.asp	Common Principles for Bank Account Switching

Hungary



Banks	Information about account switching	Bank website	Comments
CIB Bank	Complete and clear information, easy to find	http://www.cib.hu/system/fileserver?file=/Nyomtatvanyok/Bankvaltas_i_utmutato_100319.pdf&type=related	
Hanwha Bank	Information not found	http://www.hanwhabank.hu/	
MKB Bank	Complete and clear information, easy to find	http://www.mkb.hu/lakossagi/napi_penzuayek/szamlavezetes/bankvaltas/index.html	
Budapest Bank	Complete and clear information, easy to find	http://www.budapestbank.hu/szolgaltatas/lakossag/szamla-bankvaltas.php	Link to the recommendation provided by the Banking Association
OTP Bank	Information not found	https://www otpbank hu/portal/en/Retailbanking	
Hungarian Banking Association	Complete and clear information	http://www.bankszovetseg.hu/anyag/feltoltott/Bankvaltasi_kodex_1000316.pdf	Recommendation on facilitating bank account switching

Ireland



Banks	Information about account switching	Bank website	Comments
Allied Irish Banks	Complete and clear information, easy to find	http://www.aib.ie/personal/current-accounts/Switching-Your-Account	Personal Account Switching Code developed by the Irish Banking Federation in association with the Irish Payment Services Organisation Ltd and its members is operational since 2005. Goes far beyond the EBIC code.
Bank of Ireland	Complete and clear information, easy to find	http://www.bankofireland.ie/personal/day_to_day/switch.html	Personal Account Switching Code developed by the Irish Banking Federation in association with the Irish Payment Services Organisation Ltd and its members is operational since 2005. Goes far beyond the EBIC code.
Ulster Bank	Complete and clear information, easy to find	http://www.ulsterbank.ie/roi/personal/daily-banking/current-accounts/useful-information/switch.ashx	Personal Account Switching Code developed by the Irish Banking Federation in association with the Irish Payment Services Organisation Ltd and its members is operational since 2005. Goes far beyond the EBIC code.
Halifax Bank	Complete and clear information, easy to find	http://www.halifax.ie/node/103	Personal Account Switching Code developed by the Irish Banking Federation in association with the Irish Payment Services Organisation Ltd and its members is operational since 2005. Goes far beyond the EBIC code.
Irish Banking Federation	Complete and clear information	http://www.ibf.ie/pdfs/codes/IBF%20Personal%20Switching%20Code.pdf	Personal Account Switching Code developed by the Irish Banking Federation in association with the Irish Payment Services Organisation Ltd and its members is operational since 2005. Goes far beyond the EBIC code.

Italy



Banks	Information about account switching	Bank website	Comments
Intesa San Paolo	Complete and clear information, difficult to find	http://www.intesasanpaolo.com/scriptIbve/retail20/RetailIntesaSanpaolo/ita/patti_chiari/semplicita/ita_scheda.jsp	Only the link to the Patti Chiari guide provided, without either mentioning the switching service, or explaining it. Useless for consumers who are unfamiliar with Patti Chiari.
Banca Popolare di Milano	Complete and clear information, difficult to find	http://www.bpm.it/pattichiari/soluzioni.shtml	Only the link to the Patti Chiari guide provided, without either mentioning the switching service, or explaining it. Useless for consumers who are unfamiliar with Patti Chiari.
Monte Dei Paschi di Siena	Complete and clear information, difficult to find	http://www.mps.it/Patti+Chiari/Servizi/Cambio+conto.htm	Only the link to the Patti Chiari guide provided, without either mentioning the switching service, or explaining it. Useless for consumers who are unfamiliar with Patti Chiari.
Banca Nazionale del Lavoro	Complete and clear information, difficult to find	www.bnli.it/SupportingFiles/pattichiari_cambio_conto.pdf	Only the link to the Patti Chiari guide provided, without either mentioning the switching service, or explaining it. Useless for consumers who are unfamiliar with Patti Chiari.
UniCredit Banca	Complete and clear information, difficult to find	http://www.unicreditbanca.it/it/chisiamo/pattichiari/servizi/conti/?idc=15727	Only the link to the Patti Chiari guide provided, without either mentioning the switching service, or explaining it. Useless for consumers who are unfamiliar with Patti Chiari.
Patti Chiari (Consortium of Italian banks)	Complete and clear information	http://edu.pattichiari.it/Cittadini/conto_corrente/Cambiare Conto/cambiare Conto_corrente.kl	Switching guide developed by the Patti Chiari Consortium entered into force in 2006

Latvia



Banks	Information about account switching	Bank website	Comments
RIB	Complete and clear information, easy to find	http://rib.lv/default.php?q=c2VjdGlvbl9pZD0zNjM7bGFuZz1sYXR2aWFu	
Swedbank	Complete and clear information, easy to find	http://www.swedbank.lv/eng/pakalp/pr_1_1_5.php	A lot of conditionality which may make switching difficult. Switching process can take 45 days!!!
Norvik Banka	Complete and clear information, difficult to find	http://www.norvik.lv/lv/bank/news/2010/?id=1180	Information provided in the 'News' section
Latvijas Krajbanka	Complete and clear information, difficult to find	http://www.lkb.lv/lv/par_krajbanku/jaunumi/archyve?item=1442&page=1	Information provided in the 'News' section
SMP Bank	Information not found	www.smpbank.lv/EN	
Association of Latvian Commercial Banks	Complete and clear information	http://www.bankasoc.lv/lka/VienotiePrincipi.html	Common Principles on the Natural Persons' Current Account Switching

Lithuania



Banks	Information about account switching	Bank website	Comments
SEB bankas	Information not found	www.seb.lt	
Bankas Snoras	Complete and clear information, easy to find	http://www.snoras.com/lt/private/accounts/removing	
DnB Nord bankas	Complete and clear information, easy to find	http://www.dnb nord.lt/lt/privatiems-klientams/Saskaitos-ir-mokejimai/saskaitos-perkelimo-paslauga/	
Ukio bankas	Information not found	www.ub.lt	
Association of Lithuanian Banks	Information not found	http://www.lba.lt/	

Luxembourg



Banks	Information about account switching	Bank website	Comments
Banque et Caisse d'Epargne de l'Etat Luxembourg	Complete and clear information, easy to find	http://www.bcee.lu/fr	
BGL BNP Paribas Luxembourg	Complete and clear information, difficult to find	http://www.bgl.lu/en/bank/lib_documents/corporate/mobilite-bancaire-abbl.pdf	Search engine used to find the information on switching
Dexia Banque Luxembourg	Complete and clear information, easy to find	http://www.dexia-bil.lu/webquotes/htm/part_mob.asp?lang=en	
Banque BCP Luxembourg	Information not found	http://www.banquebcp.lu/index.aspx?nodeid=1351&mar=999&soumar=1011&req=99991	
The Luxembourg Bankers' Association	Complete and clear information	http://www.abbl.lu/dossiers/client-information/bank-account-switching	Guide "Switching bank accounts in Luxembourg"

Malta



Banks	Information about account switching	Bank website	Comments
APS Bank	Complete and clear information, easy to find	http://www.apsbank.com.mt/filebank/documents/COMMON%20PRINCIPLES%20FOR%20BANK%20ACCOUNT%20SWITCHING.pdf	
HSBC Malta	Complete and clear information, easy to find	https://www.hsbc.com.mt/1/2/PERSONAL/accounts/current-account	
Bank of Valletta	Complete and clear information, easy to find	http://www.bov.com/page.asp?p=13291&l=1	
Lombard Bank	Complete and clear information, difficult to find	http://www.lombardmalta.com/filebank/documents/Switching_Cust_Guidelines.pdf	Search engine used to find the information on switching
Malta Bankers' Association	Complete and clear information	http://www.maltabankers.org/news-details?nid=9	Common Principles for Bank Account Switching

The Netherlands



Banks	Information about account switching	Bank website	Comments
ING	Complete and clear information, easy to find	http://www.ing.nl/particulier/betalen/betaalpakketten/overstapservice.aspx	The Interbank Switch Support Service (ISSS; in Dutch: "Overstapservice") was introduced by the Dutch banking community in 2003.
Staalbankiers	Complete and clear information, easy to find	http://www.staalbankiers.nl/smartsite.dws?id=292	The Interbank Switch Support Service (ISSS; in Dutch: "Overstapservice") was introduced by the Dutch banking community in 2003.
ABN AMRO	Complete and clear information, easy to find	http://www.abnamro.nl/nl/zakelijk/betalingenverkeer/overstapservice/productinformatie.html	The Interbank Switch Support Service (ISSS; in Dutch: "Overstapservice") was introduced by the Dutch banking community in 2003.
ASN bank	Complete and clear information, easy to find	http://www.asnbank.nl/index.asp?nid=10098	The Interbank Switch Support Service (ISSS; in Dutch: "Overstapservice") was introduced by the Dutch banking community in 2003.
Rabobank	Complete and clear information, easy to find	http://www.rabobank.nl/particulieren/klant_worden/klant_worden/overstapservice/default	The Interbank Switch Support Service (ISSS; in Dutch: "Overstapservice") was introduced by the Dutch banking community in 2003.
Dutch Banking Association	Complete and clear information	http://www.nvb.nl/scrivo/asset.php?id=22956 http://www.overstapservice.nl/	The Interbank Switch Support Service (ISSS; in Dutch: "Overstapservice") was introduced by the Dutch banking community in 2003. It goes beyond the EBIC code. The service has been rated with 7.27 out of 10 by the consumer organisation Consumentenbond survey.

Norway



Banks	Information about account switching	Bank website	Comments
Sparebank1	Complete and clear information, easy to find	https://www2.sparebank1.no/portal/2489SBV/3_privat?_nfpb=true&pageLabel=page_privat_innhold&aId=1268404619506&refId=1268404620302	
YaBank	Complete and clear information, easy to find	https://ya.no/portal/content.ap?thisId=159	Electronic forms to fill out and send to the bank are provided
Skandiabanken	Information not found	http://www.skandiabanken.no	Short information provided in the 'News' section
Postbanken	Complete and clear information, easy to find	https://www.postbanken.no/no/leve/enklere_bankbytte.html	Electronic forms to fill out and send to the bank are provided
DnB Nor	Incomplete information, difficult to find	http://dnbnor.no	Only exists a hard-to-find news article about switching service, claims to have more info when logging into the online bank
Norwegian Bankers' Association	Complete and clear information	http://www.fnh.no/en/Main/Fakta/Bank/Bank-A-A/Bytte-av-bank/	Switching Code entered into force in 2008. Not limited to current account, but also loans and other bank products and services.

Poland



Banks	Information about account switching	Bank website	Comments
Allianz Bank SA	Complete and clear information, difficult to find	http://www.allianz.pl/bank-przenies_konto,13965.html	Search engine used to find the information on switching
PKO Bank Polski	Information not found	http://www.pkobp.pl/	
ING Bank Śląski	Complete and clear information, easy to find	http://www.ingbank.pl/u235/style/landing_page/navi/67201	
Kredyt Bank	Complete and clear information, easy to find	http://www.kredytbank.pl/klienci_indywidualni/ekstrakonta/Jak_zalozyc_konto_w_Kredyt_Banku	
Citibank Poland	Complete and clear information, easy to find	http://www.online.citibank.pl/page.do?content=konta&prID=10001059	
Polish Bank Association	Complete and clear information	http://www.zbp.pl/photo/NORB06/Rekomendacja.pdf	Recommendation concerning good practices in handling savings and checking accounts for individual clients on the Polish banking market

Portugal



Banks	Information about account switching	Bank website	Comments
Banco Best	Information not found	https://www.bancobest.pt/ptq/start.swe?SWEcmd=Start&SWEHo=www.bancobest.pt	
Caixa Central de Crédito Agrícola Mútuo	Complete and clear information, easy to find	http://www.credito-agricola.pt/CA/Oferta/Contas/DepositosOrdemParticulares/Mobilidade deServicosBancarios/	
Barclays	Complete and clear information, easy to find	http://www.barclays.pt/banco/seja_cliente/seja_cliente.htm?menuid=4	
Millennium bcp	Complete and clear information, easy to find	http://www.bcp.pt/site/conteudos/02/article.jhtml?articleID=610878	
Banco do Funchal	Complete and clear information, easy to find	http://www.banif.pt/xsite/Particulares/Contas/MobilidadeServicosBancarios.jsp?CH=5335	
The Portuguese Bankers Association	Complete and clear information	http://www.apb.pt/Normativas/Mobilidade+de+Servi%C3%A7os+Ban%C3%A7os/Mobilidade_de_Servi%C3%A7os_Banc%C3%A7os.htm	Common Principles for Mobility of Banking Services entered into force as of 1st March 2010

Romania



Banks	Information about account switching	Bank website	Comments
BCR	Information not found	https://www.bcr.ro	
Bancpost	Information not found	http://www.bancpost.ro/Persoane-Fizice	
Volksbank Romania	Information not found	http://www.volksbank.ro/	
Alpha Bank	Complete and clear information, difficult to find	https://www.alphabank.ro/products/Ghid_Mobilitatea_Conturilor.pdf	Search engine used to find the information on switching
ATE Bank	Information not found	http://www.atebank.ro/site/	
Romanian Banking Association	Complete and clear information	http://www.arb.ro/evenimente.php?id=18&c=March-31,-2010--Common-Rules-for-Bank-Account-Switching	Common Rules for Switching the Current Accounts held by Individuals in Lei adopted by the Romanian banking community on 31 March 2010

Sweden



Banks	Information about account switching	Bank website	Comments
SEB	Complete and clear information, easy to find	www.seb.se	
Handelsbanken	Complete and clear information, easy to find	http://www.handelsbanken.se/shb/INeT/IStartSv.nsf/FrameSet?OpenView&iddef=privat&navid=Z2_Privattjanster&navob=251&base=/shb/inet/icentsv.nsf&sa=/shb/inet/icentsv.nsf/default/q715146A7FA52AE01C125726800483FA2	
Swedbank	Complete and clear information, easy to find	http://www.swedbank.se/privat/kontakta-oss/bli-kund/checklista-for-diq-som-vill-bli-kund-i-swedbank/index.htm	
Länsförsäkringar	Complete and clear information, easy to find	http://www.lansforsakringar.se/privat/bank/konton/privatkonto/byt_bank/sidor/default.aspx	
Ikanobank	Information not found	www.ikanobank.se	
Swedish Bankers' Association	Complete and clear information	http://www.swedishbankers.se/web/bf.nsf/\$all/594165C5D1E53498C125760A0043DB32?OpenDocument	Brochure and fact sheet provided. Checklist for bank staff.

Slovenia



Banks	Information about account switching	Bank website	Comments
Abanka	Complete and clear information, easy to find	http://www.abanka.si/sys/cmstable.aspx?MapaId=254&VsebinaId=286756	
Banka Celje	Complete and clear information, easy to find	www.banka-celje.si	Link to the switching guide provided by the Banking Association.
Dezelna Banka	Complete and clear information, easy to find	http://www.dbs.si/	Link to the switching guide provided by the Banking Association.
Gorenjska Banka	Complete and clear information, easy to find	http://www.gbkr.si/osebne-finance/osebni-racuni/	Link to the switching guide provided by the Banking Association
Nova Ljubljanska Bank	Complete and clear information, easy to find	http://www.nlb.si/cgi-bin/nlbweb.exe?	Link to the switching guide provided by the Banking Association
Bank Association of Slovenia	Complete and clear information	www.zbs-giz.si/system/file.asp?FileId=2131	Rules and Procedures for Bank Account Switching

Slovakia



Banks	Information about account switching	Bank website	Comments
Volksbank Slovensko	Information not found	http://www.luba.sk/servlet/vbsk?MT=/Apps/WEB/main.nsf/vw_ByID/ID_167D3C1D97E803E5C12575080046AA6B_SK&OpenDocument=Y&LANG=SK	
VÚB Banka	Complete and clear information, easy to find	http://www.vub.sk/osobne-financie/ucty-platby/	Link to the Slovak Banking Association website
OTP Banka	Information not found	http://www.otpbank.sk/sk/	
Poštová banka	Complete and clear information, easy to find	http://www.pabk.sk/sk/osobne-financie/ucty/presun-uctov	
Tatra Banka	Complete and clear information, easy to find	http://www.tatrabanka.sk/cms/page/sk/fyzicke_osoby/ostatne_produkty/bezne_ucty/presun_bezneho_uctu.html	
Slovak Banking Association	Complete and clear information	http://www.sbaonline.sk/presun-uctov/	Rules for bank account switching

The United Kingdom



Banks	Information about account switching	Bank website	Comments
Bank of Scotland	Complete and clear information, easy to find	www.bankofscotlandhalifax.co.uk/bankaccounts/switchingtous.asp	The British Banking Code 2008, section 7
HSBC	Complete and clear information, easy to find	http://www.hsbc.co.uk/1/2/personal/current-accounts/bank-account-page;jsessionid=0000z K8D5HvIVEz3rZ9fuE0u1E:12c58n73a	The British Banking Code 2008, section 7
National Westminster Bank	Complete and clear information, easy to find	http://www.natwest.com/personal/current-accounts/g2/switching-to-us.ashx	The British Banking Code 2008, section 7
RBS	Complete and clear information, easy to find	http://www.rbs.co.uk/personal/current-accounts/g2/switching.ashx#tabs=section1	The British Banking Code 2008, section 7
Santander	Complete and clear information, easy to find	http://www.santander.co.uk/csgs/Satellite?appID=abbey.internet.Abbeycom&canal=CABBEYCOM&cid=1237851829604&empr=Abbeycom&leng=en_GB&pagename=Abbeycom%2FPage%2FWC_ACOM_Template_W2	The British Banking Code 2008, section 7
Lloyds TSB	Complete and clear information, easy to find	http://www.lloydstsb.com/current_accounts/switching_bank_account_to_ltsb.asp?WT.ac=HPprodSwitcher	The British Banking Code 2008, section 7
British Bankers' Association	Complete and clear information	http://www.bba.org.uk/content/1/c6/01/30/85/Banking_Code_2008.pdf	In the Banking Code 2008 banks have taken a new commitment on current account switching "to help customers switch their current accounts to another bank" (see section 7 of the CP).

ANNEX 2

QUESTIONNAIRE FOR COLLECTING CONSUMER TESTIMONIES

Questionnaire: switching bank accounts (current account)

We are looking for testimonies on the switching of bank accounts (current account); thank you for sharing your experience with us. Please return the completed questionnaire by XX / XX / XXXX at the latest.

By mail:

By fax:

By post:

	<i>Question</i>	<i>Answer</i>
1	In which bank did you have a current account that you decided to transfer? Was it your main bank?	<input type="checkbox"/> : yes <input type="checkbox"/> : no
2	Have you kept other products/services in this bank? If yes: which one(s)?	<input type="checkbox"/> : yes <input type="checkbox"/> : no <input type="checkbox"/> : savings account(s) <input type="checkbox"/> : securities account(s) <input type="checkbox"/> : credit(s) <input type="checkbox"/> : insurance(s) other:
3	Why have you decided to switch your current account?	<input type="checkbox"/> : dissatisfied with the bank branch <input type="checkbox"/> : dissatisfied with the bank in general <input type="checkbox"/> : dissatisfied with the cost of account <input type="checkbox"/> : overlap with one (or more) different account(s) other:
4	In which bank you opened your new current account?	
5	Did you use your two current accounts (one of the "old" bank and that of the "new" bank) in parallel? If yes, for how long?	
6	The account that you closed was?	<input type="checkbox"/> in your name <input type="checkbox"/> in joint names (e.g. your name and name of your spouse) <input type="checkbox"/> an account which you did not hold, but over which you had a power of attorney (e.g. that of your minor child)
7	What products/services were linked to this account?	<input type="checkbox"/> debit card(s) <input type="checkbox"/> credit card(s) <input type="checkbox"/> standing orders (direct debit, such as electricity bill, rent, etc.) <input type="checkbox"/> distance banking (via telephone or PC)
Switching process:		
8	When did you notice your new bank you wish to transfer your current account?	
9	When the transfer has been effective?	
10	Did you sign a document authorising your new bank to take on some of the formalities related to this transfer? If yes, please specify the name of this document	

11	Did you receive any explanations/brochures on the aid regarding this transfer that your new bank could provide to you?	
Please indicate whether the following statements describe your situation fully/partially/not at all:		
12	I expressed to my new bank my intention to transfer my current account	
13	I expressed to my old bank my intention to close my current account	
14	I hesitated a long time to transfer my current account, especially because of many steps to take	
15	Since my current account is linked to a loan/investment, I can not/hesitate to transfer it to another bank	
16	When I mentioned my intention to transfer my account, the banker spontaneously evoked the interbank mobility service	
17	When I mentioned my intention to transfer my account, the banker explained me the functioning of interbank mobility service	
18	I feel I was much helped by my new bank during the transfer	
19	- Transferring a current account is easy. - Transferring a current account is fast. - Transferring a current account is inexpensive.	
20	Are there other comments or issues you find interesting to report? If yes, please mention and summarise them	
21	How long did you own the account you transferred	<input type="checkbox"/> less than 3 years <input type="checkbox"/> between 3 and 10 years <input type="checkbox"/> between 10 and 25 years <input type="checkbox"/> more than 25 years

ANNEX 3

CONSUMER TESTIMONIES – DENMARK

Questionnaire: switching bank accounts (current account)

In which bank did you have a current account that you decided to transfer? <i>(The columns on the right show the distribution of the respondents over the banks mentioned by them. Ie. 25% of the respondents had an account in Danske Bank, when they decided to switch)</i>	Amagerbanken Andelskassen Arbejdernes Landsbank Bank Trelleborg BG Bank Brørup Sparekasse Danske Bank DiBa Djurslands Bank EBH - Bank Eik Bank Fonia Forstædersnes Bank FRØS Fur Sparekasse Sparekassen Hvetbo Jyske Bank Langå Bank Lån & Spar Merkur Andelskasse Nordea Nykredit Bank Roskilde bank Skjern Bank Slagelse Sparekasse Spar Nord Bank Sparbank Svendborg Sparekasse Sydbank	1% 1% 4% 1% 5% 1% 25% 1% 1% 2% 2% 4% 1% 1% 1% 1% 1% 1% 1% 1% 1% 1% 1% 1% 1% 23%
Was it your main bank?	Yes: 98% / No: 2%	
Have you kept other products/ services in this bank?	Yes: 27% / No: 73%	
If yes: which one(s)?	Savings account(s): 38% Securities account(s): 15% Credit(s) : 19% Insurance(s) : 12% Other: 38% *	
	* 60% of these state, that they kept a "regular" account (for receiving pay from employer, government (subsidiaries, etc.) (it's not atypical to have more than one in Denmark)	
Why have you decided to switch your current account?	Dissatisfied with the bank branch: 15% Dissatisfied with the bank in general: 29% Dissatisfied with the cost of account: 31% Got a better offer in the new bank: 9% Bank went bankrupt / closed / were bought by other bank: 12% Dissatisfied with bank advisor / better advisement in new bank / followed bank advisor to new bank: 13% Overlap with one (or more) different account(s) : 0% Other: 22% *	
	* 32% of these changed bank because they physically moved to another part of the country	

In which bank you opened your new current account?	Alm. Brand Bank Amagerbanken Arbejdernes Landsbank Basisbank BG Bank (Now Danske Bank) BRF Bank Brørup Sparekasse Danske Bank Den Jyske Sparekasse Diba E*Trade Bank Eik Bank Fionia Bank (Now Nordea) Forstædersnes Bank Jyske Bank Jyske Sparrekkasse LokalBanken (Now Handelsbanken) Lån & Spar Max Bank Merkur bank Middelfart Sparekasse Morsø Sparekasse Møns Bank Nordea Nordea AND Danske Bank Nordfyns Bank Nykredit Bank Ringkøbing Landbobank Rise Sparrekkasse Skælskør Bank Spar Nord Bank SparBank Sparekassen Hobro Sparekassen Sjælland Sparekassen Thy SparSalling Sydbank Tønder Bank Vestjysk Bank	1% 1% 5% 4% 2% 1% 1% 9% 3% 1% 1% 1% 3% 1% 1% 1% 7% 1% 1% 1% 3% 1% 1% 1% 1% 1% 1% 10% 1% 1% 10% 1% 1% 5% 3% 1% 2% 1% 1% 2% 1% 2%
Did you use your two current accounts (one of the "old" bank and that of the "new" bank) in parallel?	Yes: 37% No: 53% Don't remember: 10%	
If yes, for how long?	2-3 days 5 days 1 week 1-2 weeks Approx. three weeks Approx. a month Two months Two - three months Three months Three - four months A year Six years Still uses Can't remember	11% 3% 3% 6% 9% 17% 11% 3% 3% 3% 3% 17% 9%
The account that you closed was?	In your name: 68% In joint names (e.g. your name and name of your spouse) : 46% An account which you did not hold, but over which you had a power of attorney (e.g. that of your minor child): 0% Other: 3%	
What products/services were linked to this account?	Debit card(s): 7% Credit card(s): 88% Standing orders, direct debit, such as electricity bill, rent, etc: 87% Distance banking (via telephone or PC): 72% Other (primarily loan, pension or stock / securities deposit: 16%	

Switching process:			
8 + 9	How long did it take from you noticed your new bank you wish to transfer your current account, till the transfer was effective?	One - three days Five days Approx. a week One - two weeks Two weeks Three weeks Approx. a month Two months Two - three months Three months One year Can't remember	13% 1% 18% 6% 8% 3% 16% 4% 1% 2% 1% 26%
10	Did you sign a document authorising your new bank to take on some of the formalities related to this transfer?	Yes: 80% No: 12% Can't remember: 8%	
	If yes, please specify the name of this document	Transfer request: 14% Standard Agreement for the transfer of accounts: 7% Other document: 1% Can't remember: 78%	
11	Did you receive any explanations/brochures on the aid regarding this transfer that your new bank could provide to you?	Yes: 41% No: 26% Can't remember: 33%	
Please indicate whether the following statements describe your situation fully/partially/not at all:			
12	I expressed to my new bank my intention to transfer my current account	Describe fully: 65% Describe partially: 16% Not at all: 19%	
13	I expressed to my old bank my intention to close my current account	Describe fully: 24% Describe partially: 13% Not at all: 63%	
14	I hesitated a long time to transfer my current account, especially because of many steps to take	Describe fully: 7% Describe partially: 33% Not at all: 60%	
15	Since my current account is linked to a loan/investment, I can not/hesitate to transfer it to another bank	Describe fully: 8% Describe partially: 6% Not at all: 85%	
16	When I mentioned my intention to transfer my account, the banker spontaneously evoked the interbank mobility service	Describe fully: 38% Describe partially: 39% Not at all: 23%	
17	When I mentioned my intention to transfer my account, the banker explained me the functioning of interbank mobility service	Describe fully: 34% Describe partially: 44% Not at all: 22%	
18	I feel I was much helped by my new bank during the transfer	Describe fully: 75% Describe partially: 23% Not at all: 2%	
19	Transferring a current account is easy	Describe fully: 72% Describe partially: 25% Not at all: 3%	
	Transferring a current account is fast	Describe fully: 54% Describe partially: 39% Not at all: 7%	
	Transferring a current account is inexpensive.	Describe fully: 58% Describe partially: 30% Not at all: 12%	
21	How long did you own the account you transferred	Less than 3 years: 13% Between 3 and 10 years: 32% Between 10 and 25 years: 36% More than 25 years: 19%	

20	Are there other comments or issues you find interesting to report? If yes, please mention and summarise them.
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- It is very easy and costless to move ordinary bank accounts, PBS expenses etc. It's easy, but very expensive to move a stock depot.
- It went fine with the bank switch, but you may get somewhat uncertain about the whole process.
- A predominantly cause of my bank switching was that our talented banking advisor changed to our now current bank.
- We didn't move because we were dissatisfied with the old bank, but because the new bank was better and cheaper.
- I spend almost forty years with the same bank. This I would like to warn against!
- It's frustrating and irritating that the best interest rate is only achievable if you switch bank or threaten to switch bank.
- It is always important to follow up on the agreed, because I experienced that all the things my banker promised did not happen by itself. Never have I received so much paper information from my old bank, as I did after I told them I would switch bank. This is food for thought!
- I do not understand that the bank I moved from did not ask me what had caused the change - or what I was dissatisfied with.
- I had no problems with being honest about the reason for my choice of bank switching, since I had a good working relationship with my former bank advisor. It was solely due to a better interest rate and maximum (larger) loan option, that I chose to switch bank...
- Nykredit Bank violated their own "commercials" about how fast you can switch banks, and there were errors associated with the switch, and lack of service.
- The switch from Danske bank to Nykredit Bank was considered because the advisement (In Danske Bank) almost stopped after I no longer was an independent business owner. The switch to Nykredit has exceeded all expectations. Many contacts, follow-ups and advice on all our bank accounts.
- In retrospect it seems that my new advisor was a little too busy to get me as a customer. After my switch I have not been advised properly. The change was partly because I got divorced, and so that I could have a personal bank contact in the future.
- A little advice: Make sure to be covered in accounts with both banks until everything is ok. This requires a little extra capital and make sure it happens in a "dead" BS (payment service) period.
- I was surprised that money is not transferred via computer transmission, but sent by post?! Well, at least that was what Fur Sparekasse explained me, when I asked where my half million kroner physically were, from the date on which they were withdrawn from my account until they figured in the new account at Spar Salling: a total of five business days! When I asked them "*What if the money disappears during the handling of the Danish postal service, which is NOT rare*", the nice - but certainly ignorant - bank lady told me: "*Well, after all it doesn't happen so often*"!
- A little advice: Be prepared for the first meeting with your (potential) new bank. Decide what you want to gain from the switching / the new bank. Have control over your budget, and what accounts you have / which you want. Also be aware, that there is rapid response from the banks if you contact them via your online banking system (you don't have to go down and have a physical meeting).

ANNEX 4

CONSUMER TESTIMONIES – SPAIN

Questionnaire: switching bank accounts (current account)

1	Why have you decided to switch your current account?	Dissatisfied with the bank branch: 16.67% Dissatisfied with the bank in general: 26.19% Dissatisfied with the cost of account: 40.48% other: 16.67%
2	3. Did you have products/services linked to this account?	Yes: 83.33% No: 16.67% (go to question 4)
3	What products/services were linked to this account?	Debit card(s): 37.04% Credit card(s): 20.37% Standing orders, direct debit, such as electricity bill, rent, etc: 38.89% Other: 3.7%
4	Did you sign a document authorising your new bank to take on some of the formalities related to this transfer? If yes, please specify the name of this document	No: 73.08% Yes: 26.92%
5	I hesitated a long time to transfer my current account, especially because of many steps to take	Yes: 25.81% No: 74.19%
6	Since my current account is linked to a loan/investment, I can not/hesitate to transfer it to another bank	Yes: 12.9% No: 87.1%
7	I feel I was much helped by my new bank during the transfer	Yes: 51.61% No: 48.39%
8	- Transferring a current account is easy. - Transferring a current account is fast. - Transferring a current account is inexpensive. - Others	Yes: 21.67% No: 16.67% Yes: 13.33% No: 16.67% Yes: 18.33% No: 10% 3.33%

ANNEX 5

CONSUMER TESTIMONIES – BELGIUM

Questionnaire: switching bank accounts (current account)

In which bank did you have a current account that you decided to transfer?	ABN Amro 1 ABK 0 Argenta 14 AXA 6 Banca Monte Paschi Belgio 0 BPO 21 CPH 1 BBVA 0 BKCP 0 BNP Paribas Fortis 67 Caisse d'Epargne de Tournai (CET) 0 CBC 1 Centea 1 Citibank 3 Credit Europe Bank 0 Delta Lloyd 2 Deutsche Bank 0 Dexia 47 DHB 0 Ethias 1 Europabank 0 Fintro 2 Fortuneo 0 Goffin Bank 0 ING 21 KBC 9 Keytrade 0 Landbouwkrediet 0 OBK Bank 0 Rabobank.be 0 Record 2 Triodos 0 VDK Spaarbank 0
Was it your main bank?	Yes: 179 (89.95%)
Have you kept other products/services in this bank? If yes: which one(s)?	Yes: 72 (36.18%) Savings account(s): 33 Securities account(s): 16 Credit(s): 15 Insurance(s): 14 Pensions: 21 other: 13
Why have you decided to switch your current account?	Dissatisfied with the bank branch: 43 Dissatisfied with the bank in general: 62 Dissatisfied with the cost of account: 123 Overlap with one (or more) different account(s): 40
In which bank you opened your new current account?	ABN Amro 0 ABK 0 Argenta 39 AXA 5 Banca Monte Paschi Belgio 0 BPO 5 CPH 1 BBVA 0 BKCP 2 BNP Paribas Fortis 8 Caisse d'Epargne de Tournai (CET) 0

	CBC Centea Citibank Credit Europe Bank Delta Lloyd Deutsche Bank Dexia DHB Ethias Europabank Fintro Fortuneo Goffin Bank ING KBC Keytrade Landbouwkrediet OBK Bank Rabobank.be Record Triodos VDK Spaarbank	0 1 1 0 2 72 4 0 1 1 0 0 18 6 11 7 0 0 14 0 0
Did you use your two current accounts (one of the "old" bank and that of the "new" bank) in parallel? If yes, for how long?	Minimum: 0 days Maximum: 270 days	
What products/services were linked to this account?	<input type="checkbox"/> debit card(s) <input type="checkbox"/> credit card(s) <input type="checkbox"/> standing orders (direct debit, such as electricity bill, rent, etc.) <input type="checkbox"/> distance banking (via telephone or PC)	
	Switching process:	
Did you sign a document authorising your new bank to take on some of the formalities related to this transfer?	Yes: 75	
Please indicate whether the following statements describe your situation fully/partially/not at all:		
I expressed to my new bank my intention to transfer my current account	Fully: 129 Partly: 20 Not at all: 50	
I expressed to my old bank my intention to close my current account	Fully: 121 Partly: 14 Not at all: 64	
I hesitated a long time to transfer my current account, especially because of many steps to take	Fully: 41 Partly: 69 Not at all: 89	
Since my current account is linked to a loan/investment, I can not/hesitate to transfer it to another bank	Fully: 20 Partly: 21 Not at all: 158	
When I mentioned my intention to transfer my account, the banker spontaneously evoked the interbank mobility service	Fully: 27 Partly: 18 Not at all: 154	
When I mentioned my intention to transfer my account, the banker explained me the functioning of interbank mobility service	Fully: 20 Partly: 19 Not at all: 160	
I feel I was much helped by my new bank during the transfer	Fully: 90 Partly: 53 Not at all: 56	
- Transferring a current account is easy.	Fully: 92 Partly: 72 Not at all: 35	
- Transferring a current account is fast.	Fully: 72 Partly: 79 Not at all: 48	

- Transferring a current account is inexpensive.	Fully: 145 Partly: 29 Not at all: 25
How long did you own the account you transferred	Less than 3 years: 16 Between 3 and 10 years: 37 Between 10 and 25 years: 90 More than 25 years: 56
Are there other comments or issues you find interesting to report? If yes, please mention and summarise them: •	

- Datum van overstap weet ik niet meer juist. Ontevreden over Fortis en Record "bank van dorp".
- De domicileringen heb ik moeten opzoeken en zelf moeten doorgeven aan mijn nieuwe bank. Ook heb ik mijn ziekenkas en vakbond, rijkspolitie voor vakantie geld, eindejaarspremie, verzekering wat lopende was moeten verwittigen zelf. Ook mijn beleggingsbank, en voor de terugbetaling van mijn personen belastingen. Dus veel hulp krijg ge niet ge moet zelf u plan trekken.
- Domiciliëringen mee overzetten werd mij afgeraden omdat dit nog veel langer zou geduurd hebben.
- Mijn keytrade zichtrekening is mijn nieuwe hoofdzichtrekening, maar ik combineer deze met een zichtrekening bij argenta, omwille van de gratis kredietkaart + mogelijkheid tot verrichtingen aan loket, indien ooit nodig.
- BNP Paribas Fortis had blijkbaar nog nooit gehoord van dit document, ik heb 6X moet mailen en bellen eer ze de rekening afgesloten hebben.
- De onzorgvuldigheid waarmee KBC tewerk is gegaan om de rekeningen te annuleren. Het systeem van diverse kantoren die elk op zichzelf opereren maakt de boel alleen ingewikkeld. Bij Deutsche Bank kies ik een kantoor (waar ik praktisch nooit hoeft te zijn) en doe ik de rest allemaal online. Simpel, eenvoudig, goedkoop en bovenal zeer doorzichtig met weinig commerciële blablabla.
- Bij het afsluiten van de rekening bij de BPO is er een fout gebeurd: de rekening werd niet afgesloten, ondanks het feit dat alle documenten ondertekend waren. Het document is verloren gegaan tussen het postkantoor en de centrale zetel van de bank. Dit bleek pas toen ik vier maand later opeens rekeninguitreksels ontving. De bank heeft echter haar fout ingezien en de kosten niet aangerekend.
- Record bank is een bank waar ze nog geen vergoeding vragen wanneer u uw eigen geld wenst op te nemen aan het lokket, Ze luisteren en nemen tijd voor de gewone particulier, en dit volledig gratis. Dikke pluim!
- De KBC bankdirecteur wou ons twee mevensverzekeringen in het kader van het pensioensparen aanpraten terwijl hij wist dat we er al twee lopen hadden bij Ethias, First Fiscaal.
- Geen duidelijk info omtrent beleggingsprodukten bij Dexia, eigen gewin van de hoofdzetel en agentschap telde alleen. Nadien de klant.
- 1 domicilicierings-maand uitvoering heb ik manueel dienen te doen. Dus wel even opvolgen.
- Telenet rekende 12 extra kosten omdat ik hen verzuimd had een maand op voorhand te verwittigen en ze tevergeefs mijn rekening hadden aangeboden bij de oude bank. Dit moet anders kunnen. Na een maand was ook telenet in orde bij de nieuwe bank. Alles is vlot en gratis verlopen. Bij de post waren ze onverschillig over het feit dat ik vertrok.....
- Record bank sent a recorded letter in October 2009. AXA said it would take 3 months because there were credit cards on the account. No change in Feb 2010, R/B called AXA, everything was ok, April 2010 no change, they still have my money. Record bank called AXA while I was present, AXA where angry and the 3 months period will only be effective from the phone call in February, more chrsan@telenet.be
- DEXIA (ontvangende bank) Heeft alles voor mij geregeld, omzetting van domicilieringen, nieuwe paspoortmaak etc. Ik heb mijn wens kenbaar gemaakt, hoefde, na enkele besprekingen, alleen maar mijn handtekening te zetten en alles is voor mij geregeld geworden. Perfect!!!
- ik heb bij de oude bank alle domiciliëringen stopgezet en bij de nieuwe bank alles terug heropend, zo waren de leveranciers automatisch verwittigd en moest ik niets zelf meer doen.
- Ik kon niet volledig bij Dexia weggaan omdat er nog een lening van onze woning loopt en met een bestendige opdracht alleen was Dexia niet tevreden.
- Mijn vorige bank (Dexia) heeft mijn rekening en mijn spaarboekje geblokkeerd zodat ik niet meer aan mijn eigen geld kon, zonder mij op de hoogte te stellen laat staan toelating te vragen om dat te doen.

- Te weinig informatie. Mijn domiciliëringen werden onderbroken. Ik had de nodige stappen beter zelf ondernomen.
- Na herhaaldelijk informeren bij mijn oude bank waarom de rekening nog steeds niet (en nu nog altijd niet) afgesloten was, kreeg ik eindelijk, na meer dan 1 maand het antwoord dat mijn zichtrekening gekoppeld was aan een lening en dus niet kon afgesloten worden. Heel aparte manier van klantenbinding, niet?
- Ik vond het uiterst belangrijk in deze tijden dat de zichtrekening en visa kaarten gratis zijn!
- Afsluiten rekening heb ik niet gedaan wegens lening die nog loopt, maar dat is nog een paar jaar. Toch moest ik een datum invullen vanaf wanneer ik de rekening had afgesloten, terwijl dit dus niet van toepassing is - de door mij opgegeven datum is dus niet correct!
- Bij het afsluiten van de vorige bank werd die brusk afgesloten zodat ik een week geen betalingen of verrichtingen kon doen of geld afhalen;
- Argenta heb ik zelf moeten bellen omdat het saldo van mijn spaar en bankrekening maar zeer laat op mijn nieuwe rekening kwam.(meer dan 45 dagen).
- Ondanks het afsluiten kreeg ik toch nog kosten aangerekend alsof er niets gewijzigd was. ik heb die kosten genegeerd. Hetzelfde is gebeurd bij de bank van de post waarbij ik bij deze laatste ook nog abonnementskosten werd aangerekend voor master-card. Ik heb alles genegeerd.
- Testaankoop heeft mij geholpen met de afsluiting door slechte informatie vroeger van axa bank en erna ben ik er gedeeltelijk weg.
- Door verhuis heb ik een betaling van domiciliering gemist en heeft me dit herinneringskosten gekost.
- We hebben nog steeds problemen met domicilieringen die niet in orde komen. Beide van telenet en ik vermoed dat het probleem niet bij de bank ligt.
- Ik heb wel heel wat problemen gehad met de uiteindelijke vereffening van mijn oude rekening. Hoewel ik expliciet aangaf dat de automatische opdrachten geannuleerd moesten worden, gebeurde dit niet. Ze bleven open staan en mijn oude bankier in Ieper kon dit niet meer wijzigen. Het heeft me heel wat telefoontjes naar het hoofdkantoor gekost en sommige automatische opdrachten werden dubbel betaald.
- Geeft maanden geduurd eer men het overige bedrag wou terug betalen nammelijk kosten die ze voor het nieuwe jaar toch nog hebben doorgerekend en moest dan op laatste zelf nog langs komen om geld optehalen want ze konden dat niet overschrijven naar mijn nieuwe bank.
- Zowel de nieuwe als de oude bank hebben de overschakeling zeer professioneel en correct uitgevoerd.
- Er bestaan ook etische problemen die je niet altijd op voorhand weet! Het is niet omdat iets gratis is of de interest hoger is dat een andere bank een betere service geeft. Ga eerst goed na hoe je nieuwe bank werkt, hoe zijn internet werkt en hoe lang zijn hoge interesses blijven.
- De volledige afsluiting van de vorige rekening is mij onmogelijk gemaakt door fortis met beweringen dat ik mijn lening van een rekening van hun moet houden- bij fortis wil men mij duidelijk als klant houden- niet alles is mogelijk om op te zeggen.
- Service bij Bank v/d Post laat in Brasschaat de wensen over. Daarbij komt nog, dat men ons (terwijl we nog klant waren) tot 3 maal toe een lijvige enquête opstuurde omtrent hun dienstverlening. Laatste keer dat men ons deze enquête stuurde was samen met een brief die ons bedreigend overkwam. Dat was de druppel die de emmer deed overlopen.
- Ik vond het flauw dat mijn nieuwe huisbankier mij het overstaatformulier niet voorstelde. Het heeft toch wat voeten in de aarde gehad om de "verhuis" te regelen. Bij alle instanties waar ik een domiciliering of doorlopende opdracht had, moest ik de referenties opvragen per mail en dan doorgeven aan mijn nieuwe bank.
- De domiciliëring overdracht van Dexia naar Deutsche bank was soms onvolledig waardoor betalingen niet gedaan werden en ik een rappel kreeg met onkosten. Deutsche bank heeft dit goed opgevangen en de onkosten betaald.
- bankoverstapdienst werkte niet goed. Het duurde enkele maanden voordat de domiciliëringen terug in orde waren met alle gevolgen van dien, zoals onbetaalde rekeningen etc. Schuldeisers werden niet verwittigd door Deutsche Bank, noch door Dexia.
- Sommige domiciliëngsopdrachten zijn zeer moeilijk gegaan. De documenten om de hospitaalverzekering van de CM in orde te brengen hebben ruim een jaar gekost. Ook al omdat de CM pas bij het afsluiten van het jaar mij op de hoogte brachten van de 'niet-betaling', ttz van de weigering van Argenta om de betaling uit te voeren bij ontbreken van de juiste papieren van een gezinslid. De rest was wel ok?!
- Ik heb zelf van de ene bank naar de andere moeten gaan met bepaalde documenten.

- Domicilieringen heb ik uiteindelijk elf moeten regelen ondanks het feit dat men had gezegd dat dit automatisch zou gaan.
- Bij de Deutsche Bank mis ik de mogelijkheid om geld te storten op kantoor. Daarvoor moet ik 20km rijden. Voor de rest heb ik het prima naar mijn zin bij deze bank.
- Sommige firmas doen moeilijk in verband met domicilieringen, mijn nieuwe bank had die aan hen doorgegeven van de 4 die ik had is enkel BASE zonder problemen verlopen bij NUON heeft het me veel problemen en ook geld gekost.
- ING heeft stortingen van Belgisch en Amerikaans pensioen na 15 maart teruggestuurd zonder mij in kennis te stellen. Op vandaag 26 mei is dit nog niet terecht. Pensioensparen portfolio van mij en echtgenote is ook zoek, ING heeft nog altijd geen gegevens hierover. Ben zeer ontevreden over ING behandeling van de overdracht.
- Stop op 8-12-2009; pas half feb 2010 in orde, na aandringen via hoofdzetel.
- De onvriendelijkheid als je zegt dat je overstapt naar een andere bank! als je een verzekering stop zet moet de oude bank (fortis) weten naar welke andere verzekering je gaat!
- J'ai changé plusieurs fois en fonction des coûts et intérêts. Chaque fois j'ai créé mes domiciliations et ordres permanents moi-même sur le nouveau compte et fait modifier le compte destinataire des différents versements (salaires etc.). Je résilie toutes les facilités payantes (cartes etc.) mais conserve le compte au cas où les conditions redeviendraient les plus intéressantes.
- Le transfert des domiciliation a causé des problèmes.
- Pas vraiment concerné par les démarches entre/par les banques vu que j'ai tout fait personnellement en quelques heures, soit certainement plus vite qu'elles.
- Changer de banque n'est pas facile et j'attends de retoucher des contributions pour voir s'il ne se trompe pas de numéro de compte.
- Je n'ai pas pu réaliser la même démarche pour le compte commun car nous n'habitons pas à la même adresse.
- A quand la portabilité du numéro de compte en banque ?
- Ma tante a fait les même démarches dernièrement, causes: placement à risque effectué par ING ne correspondant pas du tout à son profil, et n'avait pas compris dans quoi elle s'était engagée. Elle a ouvert un compte à Record, mais n'a pas été aidée pour ces démarches, c'est elle qui a du se charger de tout. L'ING a été très agressive avec elle, ce n'est pas encore réglé.
- Je ne sais ce qui se passe si je reçois de l'argent sur le compte que je compte fermer. Par exemple un pécule de vacance ou un remboursement d'impôts. Mon banquier m'a indiqué que le transfert serait refusé c'est tout.
- La portabilité du numéro de compte serait un vrai avantage, cela éviterai de devoir mettre à jour un nombre important de signalétique. Avec le numéro de compte EU (codes BIC), cela se complique puisque lié à la banque mais il y a surement à découvrir une solution inventive.
- Lors de la procédure mes ordres permanents, domiciliations, etc. avaient étaient transférés seulement partiellement: la nouvelle banque (Keytrade) les avait activées alors que Fortis ne les avait toujours pas révoquées. Après avoir manuellement révoqué mes domiciliations mon banquier m'a appris que les procédures ne sont pas parfaites et ceci ce montre surtout quand il faut laisser un client partir.
- En fait de transfert, j'ai attendu d'avoir mon nouveau compte ouvert pour transférer tout le solde du compte de mon ancienne banque vers le compte de ma nouvelle banque. Puis j'ai moi-même clôturé l'ancien compte. Conclusion : j'ai tout fait moi-même.
- Le transfert de mes domiciliations a été un peu chaotique... Si pour certaines, cela s'est passé sans problème, pour deux autres, il a fallut que je donne le numéro de référence moi-même environ 3 mois après le transfert et pour la seconde, c'est seulement après 4 mois et une demande d'explication auprès de la nouvelle banque du pourquoi cette domiciliation n'était pas enregistrée. Sinon, tout fut ok.
- Le manque d'informations de la part des banques et de l'état sur les frais et la procédure de clôture de comptes.
- Difficulté pour le transfert des domiciliations !!! Certaines se sont faites sans problèmes et d'autres ont amené les sociétés ou le transfert de domiciliation ne s'est pas effectué normalement a compté des intérêts de retard, etc. (AXA).
- Une domiciliation, dont se charge ma nouvelle banque n'est pas encore effectuée: certaines domiciliations ont été interrompues pendant plus de 2 mois. Chaque avis de résiliation de domiciliation m'a été envoyé sous enveloppe séparée par la BPO: 11 d'un coup avec timbre à ma charge. Je n'ai pas encore été remboursée du coût de ma carte bancaire de la BPO: Dexia est plus chère, mais se trouve à 1km.

- Le transfert des domiciliations a posé problèmes pour certains cas (Electrabel, Base) : 2 cas sur 8. Jai tout de suite reçu une lettre de menace de la part d'Electrabel avec majoration pour facture impayée (alors que l'erreur venait de chez eux) car la domiciliation transférée n'avait pas fonctionné. Chez Base, ils m'ont demandé de créer une nouvelle domiciliation alors qu'elle était existante chez eux.
- Si j'ai transféré le compte avec autant de facilités, c'est uniquement grâce à la lecture de l'article dans Test-Budget & Droits (209?). Cela n'a rien couté mais j'ai passé un long moment à l'agence de la nouvelle banque (ING), dont je suis également client, parce que personne ne connaissait la procédure à appliquer (heureusement que j'avais photocopié l'article en question). Ensuite, tout fut OK.
- Il vaut mieux contacter soi-même l'employeur, la mutuelle... pour signaler le changement de numéro de compte dès que le transfert a été demandé.
- L'accueil en agence est important à mes yeux.
- Ce n'est pas les comptes qui sont difficiles à transférer mais tout ce qui tourne autour (assurances, placements, ...).
- Les domiciliations qui sont assez difficiles à transférer si on n'y pense pas alors qu'il existe des facilités.
- Certains transferts de domiciliation ne se sont pas effectués automatiquement.
- La mobilité bancaire devrait inclure les comptes épargnes, les domiciliations, les comptes-titres liés ou non à un compte à vue, pas seulement le compte À vue. Par ailleurs, aucune des agences, ni celle que je quittais ni celle vers laquelle je partais ne connaissait le service de mobilité bancaire. J'en avais pris connaissance dans les journaux, et j'en ai informé l'agence, qui la découvert.
- La banque de la poste a bloqué 2500 euros pendant PLUS DE DEUX MOIS, parce que je ne leur avais pas dit que je clôturais (prétexte invoqué). De plus, on m'a donné 2 mauvaises adresses pour le service contentieux (lettre recommandée en retour: adresse inconnue!) Je vous avais d'ailleurs envoyé un courrier à l'époque! Comme dédommagement, j'ai reçu royalement 2,8 euros, même pas le prix du recommandé!
- L'utilisation d'un compte "gratuit" chez argenta, je ne paie rien du moment que j'ai plus de 50 euros sur mes comptes, j'ai l'e-banking aussi.
- Cela fait plus de 40 ans que j'ai recours aux banques. Je trouve que les relations avec l'agence bancaire se sont régulièrement dégradées sur le plan humain et pratique. Personnellement, je ne fait plus confiance aux banques tant en terme de conseil que de gestion.
- Du côté des démarches administratives, le changement de banque a été très simple. Mais pour ce qui est de l'attitude de l'agence quand il s'agit de clôturer un compte, le bilan est bien moins bon: accueil très antipathique, humeur changeante selon l'épaisseur du compte, délai pour avoir un rendez-vous de clôture...
- C'était il y a plus de 10 ans (je ne me souviens plus trop des dates). Fortis a aussi bloqué le compte que j'avais ouvert en mon nom et sur lequel mon copain de l'époque avait procuration. Il a pu bloquer le compte et le mettre en négatif irrégulier et c'est moi qu'ils ont menacé pour récupérer leur argent alors que je leur avais expliqué les problèmes que j'avais avec lui.
- Le déplacement de l'ancien ordre permanent pour épargne pension sur le compte courant commun de la même banque annule l'indexation automatique.
- La notion de transfert est un peu erronée.
- Mon ancienne banque (Fortis), agence de Seneffe surtout, est une vraie catastrophe : aucune diplomatie avec ses clients !!! Mais toutes les agences ne le sont peut-être pas !!! Mais je n'ai pas eu envie de le vérifier.
- Le prélèvement par la BPO de 100 euros de mon compte sans mon accord a contribué à ma décision et chez Argenta les services auxquels j'ai recours sont gratuits!
- Ne jamais clôturer avant de prévenir la tour du midi pour la pension ; j'ai eu 1.5 mois de retard pour la pension de décembre.
- Il suffit de relever les transactions structurelles (salaires, ordres permanents, domiciliations etc.) et de prévoir leur "transferts" à temps, de vérifier puis de clôturer l'ancien compte.
- Le gérant de l'agence a fait de l'obstruction. Il a même vendu des titres sans mon accord.
- La banque BNP PARIBAS FORTIS n'a pas voulu que je prenne en charge (à mon nom seul) le crédit hypothécaire de ma maison (suite à un divorce) malgré nos nombreuses demandes.
- Souhait de conserver un compte épargne dans l'ancienne banque, d'y renoncer car pas de possibilité de retrait bancontact ni de pc banking, je devais donc à chaque fois me rendre au guichet pour une opération sur ce compte.

- Certains organismes n'aident pas au transfert de domiciliation. Il faut attendre leur accord.
- On a demandé explicitement de transférer les domiciliations du vieux compte clôturé sur le nouveau compte mais ils ont essayé et confirmé que c'était fait, mais ça n'a pas marché!!
- Les frais lié aux clôtures des cartes Visa.
- Dexia a été tous simplement des plus désagréable une vrai catastrophe et par la suite il mon fiché à la banque national pour 1an concernant 5,39 euros de retard sur le seul compte qui reste chez eux et que je n'ai pas encore clôturé. Je suis indépendant et cela me met dans une situation plus que dramatique merci DEXIA.
- Contacts téléphoniques spontanés de la nouvelle banque (D.B.) pour proposer de l'aide lors du transfert et pour prendre des nouvelles.
- J'avais gardé le compte ING à cause des SICAV mais la DB (ma banque depuis 18 mois) offrait transfert gratuit. ING m'a chargé la totalité de l'assurance vie des titres jusqu'à l'expiration en janvier 2011.
- Il faut transférer le contenu de son compte d'épargne sur son ancien compte à vue pour faire le transfert sur le nouveau compte!
- Pour ne pas avoir à donner des explications sur ma volonté de clôturer mon compte, j'ai dit que je déménageais à l'étranger. Ce qui explique probablement la docilité de Fortis.
- Ce que la mobilité bancaire me proposait n'a pas été effectué comme promis mais a mon insu, ce qui m'a valu quelques surprises de paiements en retard avec les frais qui vont avec.
- Le transfert n'a pas encore eu lieu mais ne saurait tarder vu les frais excessifs d'ING en cas de "ratage" de factures domiciliées (dont mon employeur est responsable pour paiement tardif du salaire et remise tardive des documents de chômage économique). A chaque fois près de 5,00EUR de pénalité.
- Les dates de changement de banque signalées sont approximatives. Elles peuvent varier de quelques semaines tout au plus. Il y a quand même 5 ans et on ne parlait pas encore à l'époque de facilités de transfert. Toutes les formalités m'ont incomberées: (signalement à mon organisme payeur de mon traitement, au bureau des contributions, mes domiciliations...). Pas mal de boulot, mais pas de regrets.
- Le banquier de mon ancienne banque n'a eu aucun argument (concernant les frais du compte qui ont beaucoup augmentés) pour me faire rester chez lui. Il n'a même pas essayé.
- Avec de la méthode c'est simple, pour ma part. Les tarifs des banques traditionnelles sont trop élevés pour mes besoins.
- Ordres de facturations (domiciliation) jusqu'à 3 mois d'attente. Je n'ai jamais pu découvrir qui est responsable. Pour l'un c'est la banque pour l'autre c'est le créancier. Au vu de la gratuité du compte j'ai été obligé de tout faire moi-même par le net.
- Toutes les domiciliations se sont bien transférées sauf une auprès de Cetelem, elle a seulement été activée début mai après un rappel de ma nouvelle banque.
- J'ai toujours eu un compte chez Fortis et j'ai ouvert un compte chez Argenta et je l'ai vite refermé vu les promesses mensongères. Mais mon cpté Fortis était aussi ouvert avant, pendant et après l'ouverture du compte Argenta. J'avais donc 2 comptes à vue en même temps dans les 2 banques.
- Comme la procédure de transfert interbancaire n'a jamais fonctionné, j'ai finalement effectué le transfert "manuellement" moi-même.
- Transférer toutes les domiciliations et les ordres permanents a été une vraie galère. Le plus simple American Express, le pire AXA.
- A ce jour, soit plus de 6 mois après les transferts de comptes, Delta Lloyd (banque que je quitte) me doit toujours un montant de précompte prélevé indûment lors de la clôture d'un compte épargne...
- La personnalité du directeur de l'agence bancaire que vous quittez peut s'avérer importante pour la facilité du transfert.
- La solution automatisée de transfert de comte n'est pas assez connue!
- Enormément de problèmes concernant les domiciliations même après 4 mois du transfert toujours pas résolues.
- Il est impossible de transférer certains actifs comme plan de pension. Il faut vendre et recommencer dans l'autre banque.

- Tout est bien à ma nouvelle banque sauf les virements bancaires prennent beaucoup plus de temps idem pour la réception de mon salaire minimum 36 heures de plus, mais tout est gratuit.
- Excellents contacts et collaboration avec le personnel de l'agence, grande servabilité de leur part.
- Je tiens à souligner le très grand professionnalisme des agences ING de Bastogne et de Liège Fétine qui ont toujours été à mon écoute et ont su répondre présentes de façon très rapide (moins de 3 jours) alors que chez Fortis ma demande traitée la plus rapidement a durée 2 semaines!
- Mon changement de banque est uniquement dû au fait que j'ai contracté un emprunt hypothécaire chez ING.
- Toutes les domiciliations n'ont pas été activées malgré qu'elles fussent enregistrées. Quelques problèmes de facture en retard.
- Mon ancienne banque a bloqué mes comptes sans me prévenir et le transfert de l'argent n'est toujours pas fait! Je trouve cela inadmissible car il s'agit de mon argent! Mon notaire est outré aussi et m'a conseillé de vous le signaler!
- Deutsche Bank a pris en charge tous les frais de transfert du compte et du dépôt titres.
- La création des "nouvelles" domiciliations (transférées) dans la nouvelle banque a été un peu délicate, en particulier celle pour Test-Achats (création de deux domiciliations au lieu d'une seule...).
- Le seul problème qui s'est posé a été un transfert de domiciliation chez Electrabel (gros cafouillage chez Electrabel) alors que tout a été parfait avec les autres bénéficiaires.
- Je suis en train de transférer un deuxième compte beaucoup plus utilisé celui-là et c'est clairement plus long.
- Le transfert des domiciliations de paiement fut pénible pour certains débiteurs alors que ce fut une formalité pour d'autres. Mobistar par exemple a tenté de me facturer des frais de rappel car ils n'ont pu continuer à utiliser l'ancienne domiciliation. Or ils m'ont envoyé un sms de remerciement pour la nouvelle domiciliation!!!
- J'ai dû expliquer à l'employée de BNP Paribas Fortis l'existence du service de mobilité interbancaire. Le processus est en route depuis le 9 juin et je ne connais pas la date à laquelle tout sera terminé.

ANNEX 6

CONSUMER TESTIMONIES – AUSTRIA

Questionnaire: switching bank accounts (current account)

In which bank did you have a current account that you decided to transfer?	Allgemeine Sparkasse Oberösterreich Bank Austria Bank für Tirol und Vorarlberg BAWAG/PSK BKS Bank BTV Dornbirner Sparkasse Easybank Erste Bank Hypo-Alpe-Adria-Bank Hypo NÖ Hypo OÖ Hypo Steiermark Hypo Vorarlberg Hypo Tirol Salzburger Landes Hypo Kärntner Sparkasse Oberbank Raiffeisen Bregenz Raiffeisen Region St. Pölten Raiffeisen NÖ Wien Raiffeisen OÖ Raiffeisen Salzburg Steiermärkische Sparkasse Tiroler Sparkasse VKB Bank Volksbank Wien WSK Bank Sonstige	4 20 0 23 2 0 0 2 3 2 2 0 0 2 1 0 0 0 1 3 0 0 2 7 1 0 1 0 1 0 0 12
Was it your main bank?	Yes: 84 (94.4%) No: 5 (5.6%)	
Have you kept other products/services in this bank? If yes: which one(s)?	Yes: 31 (34.8%) No: 58 (65%) Savings account(s): 13 (41.9%) Securities account(s): 1 (3.2%) Credit(s): 11 (35.5%) Insurance(s): 9 (29%) Other: 6 (19.4%)	
Why have you decided to switch your current account?	Dissatisfied with the bank branch: 22 (24.7%) Dissatisfied with the bank in general: 29 (32.6%) Dissatisfied with the cost of account: 56 (62.9%) Overlap with one (or more) different account(s): 8 (9%) Other: 19 (21.3%)	
In which bank you opened your new current account?	Allgemeine Sparkasse Oberösterreich Bank Austria Bank für Tirol und Vorarlberg BAWAG/PSK BKS Bank BTV 0 Dornbirner Sparkasse Easybank Erste Bank Hypo-Alpe-Adria-Bank Hypo NÖ Hypo OÖ	2 5 0 7 0 0 0 34 66 2 1 0

	Hypo Steiermark	0
	Hypo Vorarlberg	0
	Hypo Tirol	0
	Salzburger Landes Hypo	1
	Kärntner Sparkasse	0
	Oberbank	2
	Raiffeisen Bregenz	0
	Raiffeisen Region St. Pölten	1
	Raiffeisen NÖ Wien	3
	Raiffeisen OÖ	3
	Raiffeisen Salzburg	0
	Steiermärkische Sparkasse	2
	Tiroler Sparkasse	0
	VKB Bank	3
	Volksbank Wien	0
	WSK Bank	0
	Sonstige	17
The account that you closed was?	In your name: 74 (83.1%) In joint names (e.g. your name and name of your spouse): 14 (15.7%) An account which you did not hold, but over which you had a power of attorney (e.g. that of your minor child): 1 (1.1%)	
What products/services were linked to this account?	Debit card(s): 76 (85.4%) Credit card(s): 34 (38.2%) Standing orders (direct debit, such as electricity bill, rent, etc.): 71 (79.8%) Distance banking (via telephone or PC): 64 (71.9%)	
Switching process:		
Did you sign a document authorising your new bank to take on some of the formalities related to this transfer?	Yes: 46 (51.7%) No: 43 (48.3%)	
Did you receive any explanations/brochures on the aid regarding this transfer that your new bank could provide to you?	Yes: 39 (43.8%) No: 50 (56.2%)	
Please indicate whether the following statements describe your situation fully/partially/not at all:		
I expressed to my new bank my intention to transfer my current account	Fully: 70 (78.7%) Partly: 6 (6.7%) Not at all: 13 (14.6%)	
I expressed to my old bank my intention to close my current account	Fully: 50 (56.2%) Partly: 13 (14.6%) Not at all: 26 (29.2%)	
I hesitated a long time to transfer my current account, especially because of many steps to take	Fully: 30 (34.1%) Partly: 37 (42%) Not at all: 21 (23.9%)	
Since my current account is linked to a loan/investment, I can not/hesitate to transfer it to another bank	Fully: 4 (4.5%) Partly: 8 (9.1%) Not at all: 76 (86.4%)	
When I mentioned my intention to transfer my account, the banker spontaneously evoked the interbank mobility service	Fully: 6 (6.7%) Partly: 22 (24.7%) Not at all: 61 (68.5%)	
When I mentioned my intention to transfer my account, the banker explained me the functioning of interbank mobility service	Fully: 9 (10.1%) Partly: 19 (21.3%) Not at all: 61 (68.5%)	
I feel I was much helped by my new bank during the transfer	Fully: 59 (66.3%) Partly: 24 (27%) Not at all: 6 (6.7%)	
- Transferring a current account is easy.	Fully: 40 (44.9%) Partly: 34 (38.2%) Not at all: 15 (16.9%)	

<ul style="list-style-type: none"> - Transferring a current account is fast. - Transferring a current account is inexpensive. 	<p>Fully: 39 (43.8%) Partly: 25 (28.1%) Not at all: 25 (28.1%)</p> <p>Fully: 39 (43.8%) Partly: 38 (42.7%) Not at all: 12 (13.5%)</p>
How long did you own the account you transferred	<p>Less than 3 years: 8 (9%) Between 3 and 10 years: 26 (29.2%) Between 10 and 25 years: 46 (51.7%) More than 25 years: 9 (10.1%)</p>

ANNEX 7

CONSUMER TESTIMONIES – SLOVENIA

Questionnaire: switching bank accounts (current account)

In which bank did you have a current account that you decided to transfer?	Abanka Vipa Banka Celje Banka Koper Banka Sparakasse Banka Volksbank Banka Zasavje Gorenjska Banka NLB Nova KBM Raiffeisen banka	2 2 1 1 1 1 2 19 2 1
Was it your main bank?	Yes: 32 (100%) No: 0	
Have you kept other products/services in this bank? If yes: which one(s)?	Yes: 15 (50%) No: 15 (46.88%) Savings account(s): 9 (28.13%) Deposit: 6 (18.75%) Annuity saving: 4 (12.5%) Insurance(s): 1 (3.13%) Credit: 8 (25%)	
Why have you decided to switch your current account?	Dissatisfied with the bank branch: 10 (31.25%) Dissatisfied with the bank in general: 17 (53.13%) Dissatisfied with the cost of account: 18 (56.25%) More favorable credit conditions in the new bank: 11 (34.38%) Other: <i>Unable to get credit in this bank, poor customer relations, too expensive (4 times), no MasterCard available, outdated internet banking, low interest rates, better terms and conditions in the new bank, not enough parking spaces available</i>	
In which bank you opened your new current account?	Abanka Vipa Banka Celje Banka Spakasse Delavska hranilnica Deželna banka Hranilnica Lon Hypo Alpe-Adria-Bank Raiffeisen banka SKB Unicredit banka Slovenija	1 1 10 4 2 1 2 1 2 7
Did you use your two current accounts (one of the "old" bank and that of the "new" bank) in parallel? If yes, for how long?	Yes: 14 (43.75%) No: 16 (50%)	
If yes, for how long?	7 days-2 months: 7 (21.89%) 3-5 months: 5 (12.51%) 6 months-1 year: 3 (9.39%) No answer: 19 (59.38%)	
The account that you closed was?	In your name: 30 (93.75%) In joint names (e.g. your name and name of your spouse): 2 (6.25%)	
What products/services were linked to this account?	Debit card(s): 22 (68.75%) Credit card(s): 20 (62.5%) Standing orders: 19 (53.38%) Direct debit: 16 (50%) Internet banking: 24 (75%)	
Switching process:		
Did you sign a document authorising your new bank to take on some of the formalities related to this transfer?	Yes: 13 (40.63%) No: 17 (53.13%) No answer: 2 (6.25%)	

Did you receive any explanations/brochures on the aid regarding this transfer that your new bank could provide to you?	Yes: 19 (59.38%) No: 8 (25%) No answer: 5 (15.63%)
Please indicate whether the following statements describe your situation fully/partly/not at all:	
I expressed to my new bank my intention to transfer my current account	Fully: 19 Partly: 6 Not at all: 3
I expressed to my old bank my intention to close my current account	Fully: 19 Partly: 1 Not at all: 7
Since my current account is linked to a loan/investment, I can not/hesitate to transfer it to another bank	Fully: 1 Partly: 2 Not at all: 20
When I mentioned my intention to transfer my account, the banker spontaneously evoked the interbank mobility service	Fully: 15 Partly: 8 Not at all: 3
When I mentioned my intention to transfer my account, the banker explained me the functioning of interbank mobility service	Fully: 13 Partly: 9 Not at all: 3
- Transferring a current account is easy. - Transferring a current account is fast. - Transferring a current account is inexpensive.	Fully: 14 Partly: 9 Not at all: 3 Fully: 14 Partly: 9 Not at all: 3 Fully: 14 Partly: 9 Not at all: 3
How long did you own the account you transferred	Less than 3 years: 2 (6.25%) Between 3 and 10 years: 11 (34.38%) Between 10 and 25 years: 17 (53.13%) More than 25 years: 2 (6.25%)
Are there other comments or issues you find interesting to report? If yes, please mention and summarise them:	
<ul style="list-style-type: none"> • There have not been big complications because I have been informed about the transfer (information available from the old and the new bank, I have read few internet forums on this topic). • There have been some difficulties in the process of Euro card cancellation. • Due to deposits which are active in the old bank I still have the old account opened but I have minimised all the costs of it. • I have been thinking about the transfer for some time but did not know about the simplicity of the process until I have read the article about it in your magazine. • Old banks try to keep customers as long as they can with a number of smaller costs and commissions for bank account closure. The new ones do not really now what it means to get a new customer. • The process of closing an account is long (cash deposit and withdrawals, relatively high expenses according to the amount of bank work input for closing an account). 	

ANNEX 8

CONSUMER TESTIMONIES – THE CZECH REPUBLIC

Question	10/06/11_1555	10/06/11_1820	10/06/12_0559	10/06/12_0559	10/06/12_0806	10/06/12_1024	10/06/12_1105	10/06/12_1118	10/06/12_0717	10/06/12_0721	10/06/12_0837	10/06/12_0840	10/06/12_1054	10/06/12_1148	10/06/12_0916	10/06/12_1108	10/06/12_1151	10/06/12_1158	10/06/12_1338	10/06/12_1358	10/06/12_2100	10/07/12_1452	10/07/12_1452	10/07/12_1452			
1 In which bank did you have a current account that you decided to transfer?	Poštovní spořitelna (ČSOB)	Ceská spořitelna	ČSOB	Ceská spořitelna	Ceská spořitelna	Česká spořitelna	Komerční banka	Česká spořitelna	ČSOB	Komerční banka	Komerční banka	Česká spořitelna	Komerční banka, Poštovní spořitelna (ČSOB), Česká spořitelna	Raiffeisenbank	Česká spořitelna	Komerční banka	Komerční banka	Česká spořitelna	Komerční banka	Česká spořitelna	Poštovní spořitelna (ČSOB)	Česká spořitelna	Česká spořitelna				
1.1 Was it your main bank? : ne	x : ano : ano		X : ano	ano			X : ano	ano	Ano	ano	NE : ano : ano	X : ano	do 1/2 roku 2009 : ano	x : ano	...x. : ano	X : ano	ano	ano	ano				
2 Have you kept other products/services in this bank? : ne	x : ano : ano		X : ne	ano			X : ano : ano	Ne	ano	ANO.... : ano : ano : ano	X : ne	ano	x : ne	...x. : ano	X : ne	ano	ano	ano				
2.1 If yes: which one(s)?	x : pojistění	Penzijní připojistení			úvěr				X : investice (správa cenných papírů apod.)	ano. : spříčí účet	Nespokojenost s bankou obecně, velké poplatky, klesající kvalita služeb, nekvalifikovaní pracovníci banky, nabízeli mi cenu zcela nesmyslné	spříčí účet	ANO.... : spříčí účet	jiné: kreditní karta : investice (správa cenných papírů apod.)	ano. : spříčí účet : spříčí účet : úvěr : investice (správa cenných papírů apod.)								
		Stavební sporeni			pojistění				ano: úvěr	ne: pojistění	stavební sporeni : investice (správa cenných papírů apod.) : úvěr : kvůli ceně účtu : investice (správa cenných papírů apod.) : úvěr : úvěr : úvěr : úvěr : úvěr : pojistění : investice (správa cenných papírů apod.)	Stavební sporeni				
									ne: pojistění	jiné:.....	penzijní připojistení : úvěr		 : pojistění : úvěr : úvěr : úvěr : úvěr : úvěr : úvěr						
									ne: nespokojenost s pobočkou	ano:.....	kvůli ceně účtu : nespokojenost s pobočkou : kvůli ceně účtu : nespokojenost s pobočkou : nespokojenost s pobočkou	nespokojenost s pobočkou	kvůli ceně účtu										
									X : nespokojenost s bankou obecně	X : nespokojenost s bankou obecně	jiné: nevyhovující doba	ANO.... : nespokojenost s bankou obecně	 : nespokojenost s bankou obecně	nespokojenost s bankou obecně												
								 : kvůli ceně účtu	x : kvůli ceně účtu : obdobné služby využívám i jinde (duplicitně)	ANO.... : kvůli ceně účtu		X : kvůli ceně účtu	ano: kvůli ceně účtu	X : kvůli ceně účtu	x : kvůli ceně účtu	...x. : kvůli ceně účtu	X : kvůli ceně účtu : kvůli ceně účtu							
									poplatky za příchozí platby v EUR : obdobné služby využívám i jinde (duplicitně)	nekorektní jednání, vykrádání vysokých částek z účtu	ANO.... : obdobné služby využívám i jinde (duplicitně)	 : obdobné služby využívám i jinde (duplicitně) : obdobné služby využívám i jinde (duplicitně) : obdobné služby využívám i jinde (duplicitně) : obdobné služby využívám i jinde (duplicitně) : obdobné služby využívám i jinde (duplicitně) : obdobné služby využívám i jinde (duplicitně)	X: obdobné služby využívám i jinde (duplicitně)							
									mBank	Sparkasse D	KB, a.s.	mBank	mBank	Fio	mBank	mBank	mBank	FIO	Unicredit Bank	mBank	Reiffessen Bank	mBank	mBank	mBank	FIO BANKA mBANK	Československá obchodní banka, a.s.	mBank

Question	10/06/11_1555	10/06/11_1920	10/06/12_0659	10/06/12_0659	10/06/22_0806	10/06/22_1024	10/06/22_1105	10/06/22_1105	10/06/24_0717	10/06/24_0837	10/06/24_0840	10/06/24_1054	10/06/24_1118	10/06/25_0949	10/06/25_1108	10/06/25_1108	10/06/25_1151	10/06/27_2138	10/06/28_1338	10/07/03_2155	10/07/07_2100	10/07/09_1442	10/07/12_2324	10/07/17_1452
5 Did you use your two current accounts (one of the "old" bank and that of the "new" bank) in parallel? If yes, for how long?	ne	4 měsíce	ne		cca 1,5 měs.		ne		NE	Ano, 2 měsíce	Ano, cca. 1/4 roku souběžně	ne	Ano, několik měsíců, CP incest stále používám.....	Ano-týden2 měsíce.....	Ano, 1,5 roku	Cca 1 rok	1 měsíc3 měsíce.....	ANO, 6 MĚSÍCŮ	Cca 4 měsíce, Poštovní spořitelna pomalu reaguje, na každou službu vypíše rádanku a od dalšího měsíce ji teprve začíná zpracovávat středisko v Praze, u úvěru a kontokorentů (povoleného přečerpání) je to ještě mnohem horší, oproti ostatním peněžním ústavům jsou sice všechny dostupné hlavně díky pošte, ale na	Dosud (jen jako zálohu, 98 % transakcí provádím přes novou banku)		
6 The account that you closed was? na Vaše jméno	x na Vaše jméno na Vaše jméno	X na Vaše jméno			X : na Vaše jméno na Vaše jméno	Na moje jméno	na Vaše jméno	ANO... na Vaše jméno na Vaše jméno na Vaše jméno na Vaše jméno	X na Vaše jméno	ano: na Vaše jméno	x na Vaše jméno na Vaše jméno na Vaše jméno na Vaše jméno na Vaše jméno na Vaše jméno na Vaše jméno na Vaše jméno
						společný účet			Ano: debetní kartu	debetní kartu společný účet (např. s manželem/m anželkou) debetní kartu		 společný účet (např. s manželem/m anželkou) společný účet (např. s manželem/m anželkou) společný účet (např. s manželem/m anželkou) společný účet (např. s manželem/m anželkou)	X společný účet (např. s manželem/m anželkou)	debetní kartu	debetní kartu	debetní kartu	debetní kartu	
7 What products/services were linked to this account? debetní kartu	x debetní kartu debetní kartu	X debetní kartu	kreditní kartu xtrvalé příkazy, povolení k inkasu apod.		X :kreditní kartu	Ano:kreditní kartu	debetní kartu	trvalé příkazy účet nebyl můj, měl/a jsem k němu pouze dispoziční práva (např. šlo o účet Vašeho dítěte) debetní kartu účet nebyl můj, měl/a jsem k němu pouze dispoziční práva (např. šlo o účet Vašeho dítěte) debetní kartu účet nebyl můj, měl/a jsem k němu pouze dispoziční práva (např. šlo o účet Vašeho dítěte) debetní kartu účet nebyl můj, měl/a jsem k němu pouze dispoziční práva (např. šlo o účet Vašeho dítěte) debetní kartu debetní kartu debetní kartu debetní kartu	kontokorent trvalé příkazy, povolení k inkasu apod.	
 trvalé příkazy, povolení k inkasu apod.	x trvalé příkazy, povolení k inkasu apod. trvalé příkazy, povolení k inkasu apod.	X trvalé příkazy, povolení k inkasu apod.	elektronické bankovnictví		X: trvalé příkazy, povolení k inkasu apod.	Ano trvalé příkazy, povolení k inkasu apod.	trvalé příkazy, povolení k inkasu apod.	elektronické bankovnictví - internet	ANO... debetní kartu elektronické bankovnictví (telefon, internet) trvalé příkazy, povolení k inkasu apod.	X debetní kartu	ano. debetní kartu	x debetní kartu debetní kartu debetní kartu	X debetní kartu	trvalé příkazy, povolení k inkasu apod. elektronické bankovnictví (telefon, internet)			
 elektronické bankovnictví (telefon, internet)	 elektronické bankovnictví (telefon, internet)	X elektronické bankovnictví (telefon, internet)				Ano:elektronické bankovnictví (internet)	elektronické bankovnictví (internet) kreditní kartu	 elektronické bankovnictví (internet) kreditní kartu kreditní kartu	ano. kreditní kartu kreditní kartu kreditní kartu kreditní kartu kreditní kartu kreditní kartu kreditní kartu kreditní kartu elektronické bankovnictví (telefon, internet)	
Switching process:									janv-08	ANO... trvalé příkazy, povolení k inkasu apod.	Převod proběhl cestou: vytvoření, převedení prostředků a zrušení původního. Banka sama od sebe nedělá nic.		X trvalé příkazy, povolení k inkasu apod.	ano. trvalé příkazy, povolení k inkasu apod.	x trvalé příkazy, povolení k inkasu apod.x. trvalé příkazy, povolení k inkasu apod.	X. trvalé příkazy, povolení k inkasu apod.						janv-08	

Question	1/4/10	févr-10	mars-10	O této možnosti jsem nevěděl, založil jsem nový účet a když jsem viděl, že na něj přicházejí i odcházejí platby, jsem zrušil starý	převod jsme provedli sami	déc-09	ne	nov-09	janv-08	ANO... elektronické bankovnictví (telefon, internet)	V únoru 2010	nikdy	X elektronické bankovnictví (telefon, internet)	ano. elektronické bankovnictví (telefon, internet)	x elektronické bankovnictví (telefon, internet)	x elektronické bankovnictví (telefon, internet)	Byla mi nabídnuta pomoc při realizaci, vysvětlen proces, který bude následovat a připomenutý kroky nutné k zajistění, přiblžný časový scénář (vrácení karet, vyrovnaní kontokorentu, zrušení obnovy karet a pojistění apod.).	Se všemi příkazy květen 2008		
8 When did you notice your new bank you wish to transfer your current account?																				
9 When the transfer has been effective?	1/5/10			O tyden později ze strany nové banky, o měsíc později ze strany původní banky	ne	i hned			prosinec	V květnu	déc-09	Ne. Vše se minou osobně řešila bankovní úřednice. Veškeré pokyny jsem dávala svým jménem.		Viz výše	až jsem si sama vše převedla	avr-10		Nejprve jsem se o to pokoušela přes 2 měsíce sama a později jsem požádala o pomoc novou banku, pak vše šlapalo jak má (cca 2 týdny kompletně).	Ne	
10 Did you sign a document authorising your new bank to take on some of the formalities related to this transfer? If yes, please specify the name of this document	Ano	ne		ne				NE	ne	NE	ano	Více změn, tj. různě, jakmile jsem někde viděl lepší služby/ceny.....		ne	Žádný převod nebyl potřeba. Nový účet fungoval už 1.5 roku. Vše jsem vyřešil přes internetové bankovnictví. Starý účet byl v podstatě zrušen okamžitě (s měsíční dobou splatnosti) na pobočce.	Zvolil jsem opačný postup: 30.5.2010-zrušení všech účtu u KB a převod peněz na můj nový účet u FIO.	Před 2 roky	Založení účtu listopad, nerozumím převodu účtu, platby jsem si postupně převáděla sama	NEPŘEVÁDĚL ALE ZRŮSIL STARÝ A ZALOŽIL NOVÝ	Ne

Question	10/06/21_1555	10/06/21_1920	10/06/21_0659	10/06/21_0659	10/06/21_0659	10/06/21_0659	10/06/21_1024	10/06/21_1105	10/06/21_2118	10/06/21_0717	10/06/21_0837	10/06/21_0840	10/06/21_1054	10/06/21_1148	10/06/21_1148	10/06/21_1108	10/06/21_1108	10/06/21_1511	10/06/21_2158	10/06/21_2158	10/07/07_2100	10/07/07_2100	10/07/09_1942	10/07/13_2324	10/07/17_1452		
If yes, please specify the name of this document	Souhlas s využíváním osobních údajů pro účely ČS	ano												Jakmile jsem založil nový účet a převedl trvalé příkazy			ne	Ne	Do 1 měsíce		IHNED	Ano (od účtu samotného, doplnkových službách zdarma v rámci balíčku, platební a kreditní karty, pojistění karet, úrokové sazby, sazeníků a možné nabídky na účelový a neúčelový úvěr, elektronické bankovnictví). Dále předána vizitka a předány letáky na prostudování penijního fondu, stavebního spoření, investic).					
11 Did you receive any explanations/brochures on the aid regarding this transfer that your new bank could provide to you?	ano													ANO	ano	plně	NE.....	vůbec		ne.....	NE		Odpovídá vůbec			
Please indicate whether the following statements describe your situation fully/partially/not at all:														plně – sleznu v mé staré banku to nějak nezájmalo, že chci účet zrušit a proč. Bylo jí to jedno.		NE	plně	vůbec			Ne	V KB - zrušení všech účtu+pojištění a převod peněz na můj nový účet.					
12 I expressed to my new bank my intention to transfer my current account	plně /	plně	plně /		vůbec	plně				plně	plně				plně – sleznu v mé staré banku to nějak nezájmalo, že chci účet zrušit a proč. Bylo jí to jedno.	NE	plně	vůbec	Dále prosím popište, zda následující tvrzení odpovídají plně/částečně/vůbec vaši zkušenosti (nehodí se škrtnout či vymazat):	Přes internet	ano	Ano, smlouva, podmínky.....	NE	vůbec			
13 I expressed to my old bank my intention to close my current account	plně /	plně	plně /		plně	plně				plně	plně	vůbec				plně / vůbec	částečně	plně	plně / částečně / vůbec		Dále prosím popište, zda následující tvrzení odpovídají plně/částečně/vůbec vaši zkušenosti (nehodí se škrtnout či vymazat):			plně	plně		
																			/vůbec	plně / částečně / vůbec	vůbec	plně	plně / vůbec	vůbec			

Question	10/06/21_1555	10/06/21_1920	10/06/22_0559	10/06/22_0659	10/06/22_0806	10/06/22_1005	10/06/22_1228	10/06/24_0717	10/06/24_0721	10/06/24_0837	10/06/24_0840	10/06/24_1054	10/06/24_1148	10/06/25_0049	10/06/25_1108	10/06/25_2151	10/06/28_1538	10/07/03_2158	10/07/07_2100	10/07/09_1542	10/07/13_2234	10/07/17_1452
14 I hesitated a long time to transfer my current account, especially because of many steps to take	částečně / plně	částečně / vůbec	plně	vůbec		vůbec	částečně	plně	vůbec	plně / částečně / vůbec	vůbec	vůbec	plně / částečně / vůbec	plně	/ vůbec	plně / částečně / vůbec	vůbec	plně	vůbec			
15 Since my current account is linked to a loan/investment, I can not/hesitate to transfer it to another bank	vůbec	vůbec	/vůbec	vůbec			není prolinkován na žádné investice	vůbec	vůbec	plně / částečně / vůbec	vůbec	vůbec	plně / částečně / vůbec	vůbec	/ vůbec	plně / částečně / vůbec	částečně	vůbec	vůbec			
16 When I mentioned my intention to transfer my account, the banker spontaneously evoked the interbank mobility service	vůbec	částečně	plně / částečně / vůbec	vůbec			plně	vůbec	vůbec	banka založila účet a vše ostatní jsem si zajistila sama pomocí internetového bankovnictví	plně / částečně / vůbec	vůbec	plně / částečně / vůbec	vůbec	/ částečně / vůbec	plně	vůbec – s původní bankou byly problémy až do samého konce. Vzdy, když vyprášela lhůta pro nějaký požadovaný krok, vyuřbil se další a opět běžela lhůta od začátku	vůbec	vůbec			
17 When I mentioned my intention to transfer my account, the banker explained me the functioning of interbank mobility service	vůbec	částečně	plně / částečně / vůbec	vůbec			plně	plně	vůbec	plně	plně / částečně / vůbec	vůbec	vůbec	plně / částečně / vůbec	vůbec	/ vůbec	plně / částečně / vůbec	částečně	plně – bankér nové banky maximálně pomohl, vše vysvětlil, osobně předvedl využití jednotlivých služeb v praxi a zmínil doplňkové služby včetně aktuálního sazebníku a odzaku na webové stránky	částečně		
18 I feel I was much helped by my new bank during the transfer	vůbec	vůbec	plně / částečně / vůbec	vůbec			plně	plně	vůbec	plně / částečně / vůbec	částečně	plně / částečně / vůbec	Moje finanční poradkyně u KB ani nevěděla, že existuje nějaká FIO banka. Myslím, že nejlepší informace najdu na internetu a podle toho pak postupuj	/ vůbec	plně / částečně / vůbec	plně						

Question	10/06/21_1555	10/06/21_1920	10/06/21_0559	10/06/21_0559	10/06/21_1024	10/06/21_0806	10/06/21_1105	10/06/21_2118	10/06/21_0717	10/06/21_0721	10/06/21_0837	10/06/21_0840	10/06/21_1054	10/06/21_1148	10/06/21_0409	10/06/21_1108	10/06/21_1511	10/06/21_2159	10/06/21_2159	10/07/07_2100	10/07/08_1942	10/07/13_2324	10/07/17_1452
19 Transferring a current account is easy.		plně	částečně	plně /		plně	plně			plně	plně	plně	plně / vůbec	částečně	částečně		plně / vůbec	nový účet jsem měl založen u FIO během cca 10minut	/ vůbec	plně / vůbec	vůbec	vůbec	částečně
Transferring a current account is fast.		plně	částečně /	/ částečně /		částečně	plně			plně	plně	plně	plně – nic mě převod účtu nestál, ani v nové a ani ve staréance	částečně / vůbec	částečně	částečně		ano	plně	plně	vůbec	vůbec	plně
Transferring a current account is inexpensive.		plně	plně /	plně /		plně	plně			plně	plně	plně	<i>Ne, vše bylo o.k.</i>			plně / částečně / vůbec	plně / částečně / vůbec					plně (ČSOB mi na nově zřízený účet uhradila veškeré poplatky spojené se zrušením inkasa, TP apod.)	
													plně / částečně / vůbec			plně / částečně / vůbec	ano	plně	plně	plně	plně	<i>Přestože jsem byla velmi nespokojená s službami, chováním a arrogancí pracovníků, byl velký problém se zrušením účtu a jeho zřízením v mateřské bankce. Tam byli vstřícní, ale báli se jakési interní dohody mezi mateřskou a dceřinou společností o „přetahování“ klientů. Přesvědcovala jsem je, že jde o mé vlastní rozhodnutí a jejich služeb</i>	
20 Are there other comments or issues you find interesting to report?						<i>Úřednice na pobočce ČS a.s., která účet rušila se mě pokoušela strašit, že budu litovat, že banky, kam lidé přechází, nemají pojistěné vklady a že se jich mnoho k nim stejně vraci. Pro někoho, kdy by to vše neměl předem ověřeno, by to muselo být stresující.</i>					<i>Ne je to jednoduché jen se nebát ten krok učinit</i>			plně / částečně / vůbec:	<i>Menší problém s nahlášením čísla nového účtu ohledně inkasa na úvěr ze stavebního spoření.</i>	ano	plně	částečně	plně			

Question																				
If yes, please mention and summarise them			Inkasní platby - nutno řešit s každým příjemcem samostatně									Viz níže		...: 3 - 10 let	...: méně než 3 roky	Zrušení a založení nového účtu trvá cca půl hodiny a je bezplatné také bez problémů, jinak viz bod 17	Nevím, že existuje možnost požadat svou banku o převod všech plateb o inkas na účet jiné banky... Příkazy jsem postupně převáděla sama.	NEPŘEVÁDĚL JSEM ALE ZRUŠIL STARÝ A ZALOŽIL NOVÝ		
21 How long did you own the account you transferred	: dle než 25 let	x 10 - 25 let: 10 - 25 let	X : 10 - 25 let	10 - 25 let			X : 10 - 25 let: 10 - 25 let	10 - 25 let	10 - 25 let	ANO....: 3 - 10 let: 3 - 10 let	X : 3 - 10 let	ano: 3 - 10 let	x: 10 - 25 let	...x: 10 - 25 let	x: 10 - 25 let: 10 - 25 let

ANNEX 9
MYSTERY SHOPPING - AUSTRIA

Treue lohnt nicht

Banken



Viele Vorschriften des neuen Zahlungsdienstegesetzes werden von den Banken eingehalten. Die Geldinstitute sind allerdings sehr kreativ, wenn es um das Erschließen neuer Einnahmequellen geht.

Mit 1. November 2009 wurde der Zahlungsverkehr in Österreich neu geregelt. So verbietet das Zahlungsdienstegesetz Schließgebühren, wenn jemand mit seinem Girokonto zu einer anderen Bank wechselt. Im Auftrag der Wiener Arbeiterkammer haben wir untersucht, ob sich die Geldinstitute daran halten und wie das Wechseln funktioniert.

Eröffnen meist problemlos

Nachdem wir Konten bei sieben Banken im Raum Wien (Bank Austria, BAWAG, Erste Bank, easybank, Hypo NÖ, Raiffeisenlandesbank NÖ-Wien und Volksbank Wien) eröffnet und dort Transaktionen durchgeführt hatten, veranlassten wir etwa sechs Wochen später den Wechsel zu einer anderen Bank. Als Erstes besuchten unsere Tester Bankfilialen, ließen sich ein Informationsblatt geben und wählten mit dessen Hilfe eine Kontovariante aus – im Allgemeinen die billigste, bei der eine Bankomatkarte inkludiert ist. Dann wurde der Kontoantrag ausgefüllt und abgegeben. Bei der easybank, die eine reine Internetbank ist, läuft es anders: Hier holt man sich Infos und Antrag aus dem Internet und geht

damit in eine BAWAG- oder Postfiliale. Im ländlichen Raum erlitten wir damit jedoch zweimal Schiffbruch. Die Postmitarbeiter wussten entweder nichts damit anzufangen oder verwiesen uns an die BAWAG. Generell müssen wir kritisieren, dass wichtige Unterlagen wie Kundenrichtlinien, Geschäftsbedingungen oder Preisblatt dem Neukunden nicht bei allen Banken ausgehändigten wurden.

Keine Qual der Wahl

Wer mit seiner Bank unzufrieden ist, sollte aber nicht einfach zur nächstbesten wechseln. Das Angebot ist unüberschaubar: Jedes größere Institut bietet unzählige Kontovarianten. Angestellte in Bankfilialen sind hier nach unseren Erfahrungen leider keine große Hilfe. Daher sollte man als Erstes anhand der Kontoauszüge die ungefähre Anzahl der üblichen Buchungen feststellen. Auf der Internetseite der Arbeiterkammern www.bankenrechner.at gibt man Nutzerverhalten (Wenig-, Normal- oder Intensivnutzer), Verrechnungsart (einzel oder Pauschalpaket), Häufigkeit der Überziehung und das Bundesland ein, und schon erhält man die Reihung der Kontokosten einzelner Institute. Für einen Normalnutzer in Wien etwa, der sein Konto nie überzieht, reicht die Bandbreite der Kontospesen von null (bankdirekt.at, easy gratis und direktanlage.at) bis 175 Euro und mehr im Jahr (ErfolgsKonto Gold der Bank Austria, BTV-Prestige und Hypo VIP Konto der Hypo Alpe Adria).

Alles im grünen Bereich

Auf den Testkonten führten wir auch mehrere Überweisungen per Onlinebanking durch. Alle Überweisungen brauchten

immer einen Bankarbeitstag: Veranlassten wir die Überweisung am Freitag, war das Geld am Montag angekommen. Die Beträge wurden immer sofort gutgeschrieben. Auch bei Daueraufträgen und Einzugs ermächtigungsverfahren, die wir durchführen ließen, traten keine Probleme auf. Wir veranlassten auch SEPA-Überweisungen. SEPA (Single European Payment Area = einheitlicher europäischer Zahlungsraum) heißt das neue europäische Zahlungssystem zur Beschleunigung des Geldverkehrs. Diese Überweisungen sind vor allem bei Geldtransfers in EU-Staaten sowie in die Schweiz, nach Liechtenstein, Island und Norwegen sinnvoll, weil die Transaktion dann nicht teurer kommt als eine Inlandsüberweisung. Dafür müssen aber unbedingt die Kennzahlen IBAN und BIC angegeben werden, Kontonummer und Bankleitzahl genügen nicht. In den meisten Fällen kann man IBAN und BIC jedoch mithilfe der Internetseite www.iban-rechner.de aus Kontonummer und Bankleitzahl errechnen.

Wechsel mit wenig Hindernissen

Als nächsten Schritt erledigten wir den Kontowechsel. Nur Bank Austria, BAWAG und Erste Bank behandeln dieses Thema ausführlich auf ihrer Homepage, sonst heißt es meist nur sinngemäß: „Wechseln Sie zu uns, wir erledigen den Rest.“ In den meisten Fällen wurde dieses Versprechen auch eingelöst. Nur bei der easybank muss man selbst tätig werden: In der BAWAG-Filiale werden zwar die Formulare angenommen, diese muss man aber aus dem Internet ausdrucken, ausfüllen, Dauer- und Einziehungsaufträge eintragen und unterschreiben.

kompetent

Wechsel des Girokontos kann lohnen. Auf www.bankenrechner.at findet man das billigste Konto, abgestimmt auf das Nutzerverhalten. Banken helfen Neukunden beim Wechsel, Schließgebühren sind nicht mehr erlaubt.

Einzugsermächtigungen selbst übertragen. Mithilfe der Kontoauszüge alle Einzieher feststellen und die Auftraggeber (Energieversorger, Telekom, Vermieter, Verlage, Vereine ...) über den Kontowechsel informieren.

Neue Form der Überweisungen. Auch IBAN und BIC sollten Sie angeben; vor allem bei Auslandsüberweisungen in den SEPA-Raum (EU-Staaten, Schweiz, Liechtenstein, Island, Norwegen). Beim Umrechnen hilft www.iban-rechner.de.

Kontoumstellungen nicht einfach hinnehmen. Auf mögliche Nachteile achten, wenn die Bank Änderungen beim Girokonto ankündigt. Fristgerecht Widerspruch einlegen oder zu einer anderen Bank wechseln.

Fotomontage: Erwin Haberl

Dauer unterschiedlich

Der Wechsel selbst klappte in allen Fällen problemlos, die Dauer vom Erteilen des Auftrags bis zum endgültigen Übertrag und zur Stilllegung des Kontos war allerdings sehr unterschiedlich. Beim Wechsel von der easybank zur Bank Austria war binnen vier Tagen alles erledigt. Doch in Einzelfällen dauerte der Vorgang sogar 21 Bankweltage – laut Empfehlung des Bankenverbandes soll ein Übertrag allerdings nicht länger als sieben Bankweltage brauchen! Ein Grund könnte darin liegen, dass die Unterlagen oft direkt von Bankmitarbeiterin A zu Bankbetreuer B übergeben werden. Urlaub oder Krankenstand erweisen sich da als Sand im Getriebe.

Abgerechnet wurde überall korrekt. Kontoführungsgebühren wurden aliquot verrechnet, also nur für jenen Zeitraum, in dem das Konto tatsächlich genutzt worden war. Der abschließende Kontoadauszug kam jedoch meistens per Post, mit den Portospesen von 55 Cent wurde das alte Konto belastet. Schließgebühren wurden generell nicht verlangt.

Heikle Einzugsaufträge

Das Transferieren von Einzugsaufträgen sollte man nicht der neuen Bank überlassen. Dabei erteilt ein Gläubiger (E-Werk, Mobilfunkbetreiber, Autofahrerclub usw.) den Auftrag, einen bestimmten Betrag zu einer bestimmten Zeit abzubuchen. Hat der Auftraggeber aber nicht die neue Kontonummer seines Schuldners, erzeugt dies Kosten für den fehlgeschlagenen Einzugsversuch, die natürlich der Konsument tragen muss. Uns wurde von Summen zwischen 8 und 10 Euro berichtet. Wenn dann (etwa infolge einer Adressänderung) auch

keine Mahnungen zugestellt werden, könnten auch Strom oder Handy abgedreht werden. Bei einem Kontowechsel sollte man daher die neue Kontonummer immer selbst dem Auftraggeber von Einzugsaufträgen bekannt geben. Geldinstitute weisen ihre Kunden beim Wechseln nur selten auf diese Problematik hin und bieten auch wenig Unterstützung.

Neues Gesetz – neue Probleme

Das Zahlungsdienstegesetz hat für Konsumenten teils erhebliche Verbesserungen gebracht, etwa taggleiche Wertstellung bei Eingängen, kürzere Laufzeiten bei Überweisungen, mehr Transparenz bei Überweisungsspesen, eine längere Einspruchsfrist bei Einzugsmerkmalen und bessere Vorausinformation über Lastschriften. Das alles aber kostet Geld – Geld, das sich die Banken wohl anderswo holen werden. Aktuell kündigt die Raiffeisenlandesbank NÖ-Wien ihren Kunden an, dass die Konto-pakete umgestellt werden, natürlich verbunden mit Spesenerhöhungen; auch die Zahl der Gratis-Buchungen wird reduziert. Immerhin kann man schriftlich binnen zwei Monaten ab Zustelldatum dagegen Einspruch erheben. Dann bleibt kontamäßig alles beim Alten. Die Form der Änderung „Wer schweigt, stimmt zu“

ist hier leider rechtlich gedeckt. Es ist damit zu rechnen, dass dies kein Einzelfall bleibt.

Spesen rauf, Verrechnung geändert

Letztes Jahr gab es viel Aufregung, als die Raiffeisenlandesbank Tirol 60 Cent verlangte, wenn Kunden ihr Geld aus dem Bankomaten einer fremden Bank holten. Diese Gebühren waren hierzulande bis dahin unbekannt. Der Rückzieher folgte zwar umgehend, aber jetzt lässt die Raiffeisenbank Region Ried im Innkreis einen weiteren Versuchsballon steigen und verlangt 41 Cent für Bargeldbehebungen bei Fremdbanken.

Ab April will die Raiffeisenlandesbank NÖ-Wien nicht nur höhere Kontospesen einheben, sondern die Girokonten auch auf monatliche Abschlüsse umstellen. Das wird vor allem jene treffen, die das Konto öfter überziehen. Denn die kürzeren Abrechnungsintervalle machen Überziehungen teurer. Umgekehrt haben aber jene Konsumenten kaum einen Vorteil, deren Konto immer im Plus ist, denn bei Girokonten liegen die Habenzinsen traditionell sehr niedrig. Auch das wird wohl kein Einzelfall bleiben. Anfang März hat die PSK die Habenzinsen von 0,5 auf 0,25 % gesenkt ■

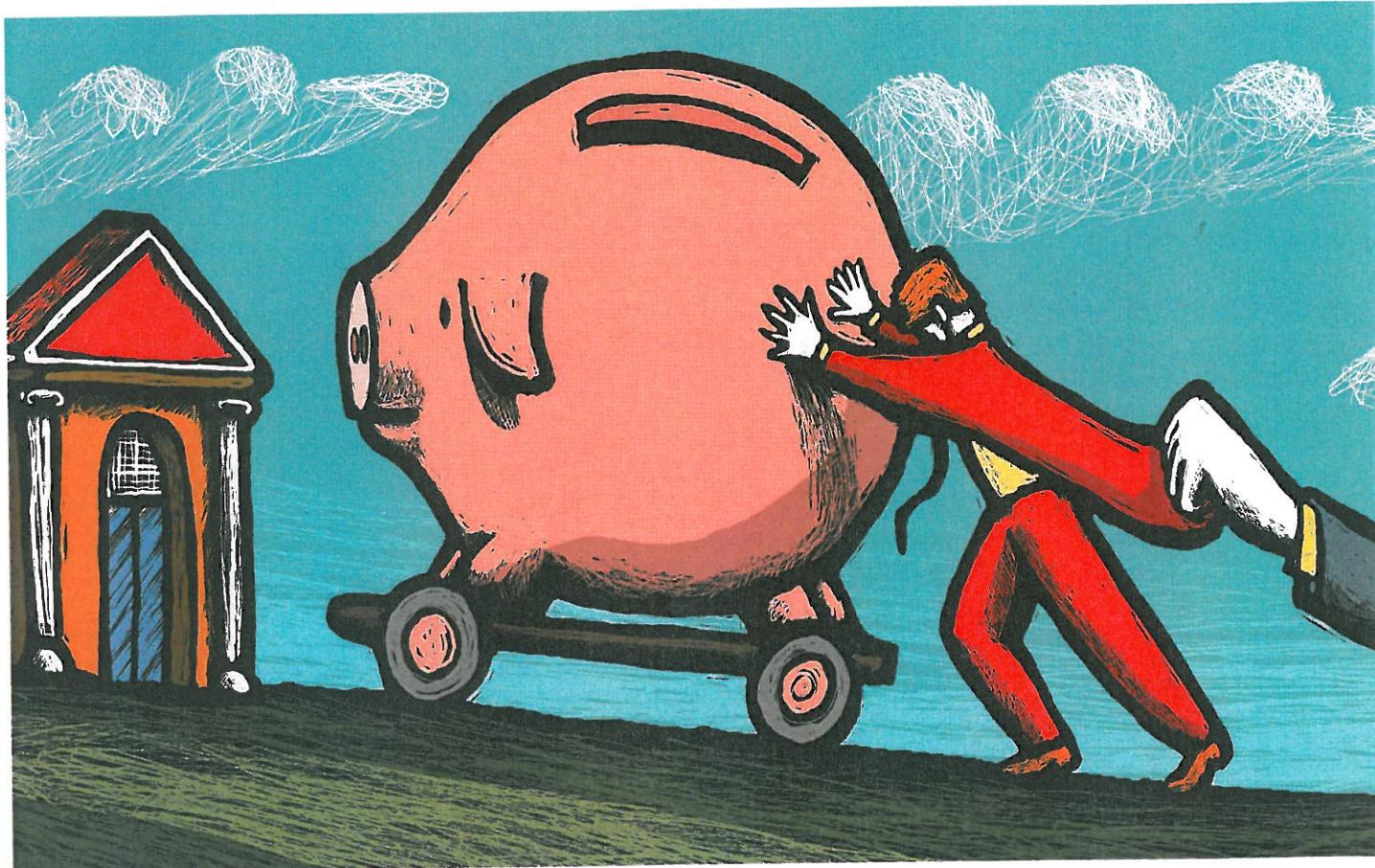
Schritt für Schritt zur neuen Bank

Mit Lichtbildausweis zur gewünschten Bank gehen. Liste der Einzüge und Daueraufträge mitbringen. Auftraggeber von Einzügen unbedingt auch selbst über den Kontowechsel informieren. Ebenso alle Stellen, von denen Sie regelmäßig Eingänge erhalten (Arbeitgeber/Pensionsversicherung, Mieter ...). Eventuelles Minus des

alten Kontos vor dem Schließen abdecken. Für ausreichend Bargeld sorgen, weil in der Übergangszeit Bankomat- und Kreditkarten oft nicht verfügbar sind. Kontrollieren, ob alle Zahlungseingänge, Dauer- und Einziehungsaufträge auf das neue Konto übertragen sind. Erst dann altes Konto schließen lassen.

ANNEX 10
MYSTERY SHOPPING – BELGIUM

Encore trop peu



Le Service de mobilité interbancaire, destiné à faciliter le changement de banque parfois même des banques. Et il n'aide qu'en partie le consommateur.

Anne-Lise Evrard et Isabelle Nauwelaers avec la participation du service enquêtes

Lors d'une enquête que nous avions menée en 2005, 44,5 % des répondants disaient être clients de leur banque depuis plus de 20 ans. Tous ces clients fidèles seraient-ils donc tellement satisfaits de leur institution financière ? On peut en douter, vu le nombre de plaintes que nous recevons (par rapport aux frais, à la compétence du personnel, aux heures d'ouverture, etc.). Alors pourquoi tant d'inertie ?

Sans doute en partie à cause de la complexité de la procédure : changer de banque signifie changer de numéro de compte et donc nécessité de prévenir tous les débiteurs (employeur, allocations familiales,...), de supprimer tous les ordres permanents et domiciliations d'un côté

pour les rouvrir de l'autre, etc. Sans compter que d'autres services financiers, tels qu'un financement ou un crédit hypothécaire, sont souvent liés à l'ancien compte.

Des progrès depuis 2004

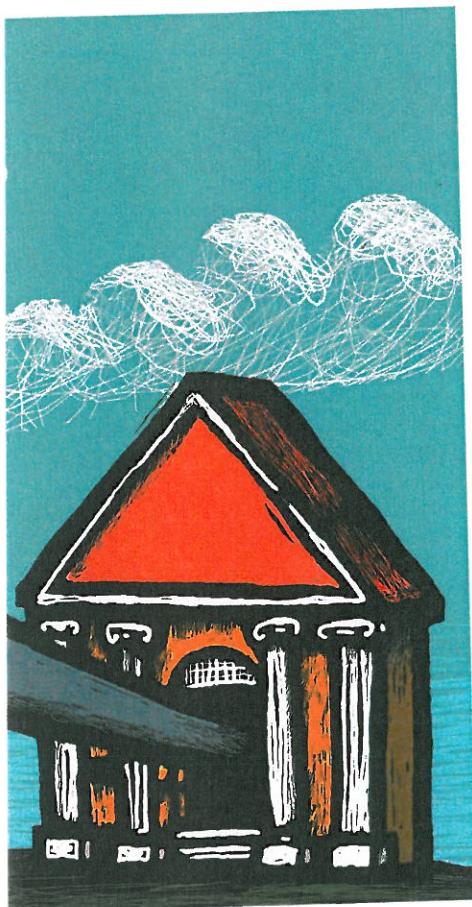
En 2004 déjà, Febelfin, la fédération du secteur financier, avait mis au point un service visant à faciliter le changement de banque : le "dossier personnel de mobilité bancaire". Il s'agissait en

réalité d'une check-list de toutes les démarches à effectuer, accompagnée de plusieurs courriers types pour avertir les débiteurs. Ce service s'est avéré un échec ; il était peu connu et il laissait l'intégralité des démarches à effectuer à la charge du consommateur.

Fin 2007, un autre pas, légal cette fois, a été franchi : il est devenu interdit aux banques de compter des frais de fermeture de compte. Une pratique assez largement répandue auparavant et

20 000 DEMANDES DE TRANSFERT EN 6 MOIS SUR 13 MILLIONS DE COMPTES À VUE, C'EST TRÈS PEU

connu



est très peu connu,

qui constituait un frein à la mobilité bancaire. La loi en question ne règle toutefois pas la problématique des frais indirects, par exemple l'augmentation du taux du crédit hypothécaire si le compte à vue est transféré dans une autre banque.

Le service de mobilité interbancaire

Les difficultés liées au fait de changer de banque ne sont pas propres à la Belgique. Il en va de même dans certains autres pays de l'Union. Sous l'impulsion de la Commission européenne, la fédération européenne des banques a dès lors mis au point des principes communs à toute l'Europe en matière de mobilité bancaire. Febelfin a transposé, pour la Belgique, ces principes dans un Code de conduite qui met en place le

"Service de mobilité interbancaire", entré en vigueur en novembre 2009.

Ce service de mobilité interbancaire prévoit que l'ancienne banque et la nouvelle doivent s'entendre entre elles pour que le transfert des ordres de paiement (domiciliations, ordres permanents et virements avec date d'exécution dans le futur) et la clôture du compte à vue se fassent sans heurts.

Ce système présente incontestablement des points positifs : d'une part, le consommateur ne doit pas se rendre à son ancienne banque, il règle le transfert avec la nouvelle. D'autre part, un certain nombre de démarches sont prises en charge par les banques elles-mêmes et, qui plus est, elles doivent le faire dans des délais précis.

Toutes étapes confondues, le délai prévu pour le transfert est de 18 jours maximum; Febelfin s'est engagée à le ramener à 8 jours dans le futur.

Mais, et c'est d'ailleurs là une des principales failles du système, un certain nombre de formalités doivent encore être accomplies par le consommateur lui-même. Il doit notamment prévenir lui-même ses débiteurs – employeur, caisse d'allocations familiales et/ou de chômage, mutuelle, éventuellement le fisc, etc. – du changement de son numéro de compte. Le Code de conduite se contente de prévoir que la nouvelle banque met à sa disposition des lettres types pour communiquer aux tiers le nouveau numéro de compte. ▶

CHANGER DE BANQUE EN PRATIQUE



1 Contactez la nouvelle banque

■ Remettez-lui la "Demande de Service de Mobilité interbancaire". Vous avez le choix entre le simple transfert des ordres de paiement, la seule clôture de votre ancien compte à vue, ou les deux.

2 La nouvelle banque se met en rapport avec l'ancienne

■ Elle lui envoie votre formulaire de demande dans les quatre jours.

3 L'ancienne banque agit

■ Si la demande concerne le transfert des ordres de paiement, l'ancienne banque envoie à la nouvelle les données relatives aux ordres concernés, elle exécute tous les ordres courants jusqu'à la date de transfert, et elle arrête ceux dont l'exécution tombe après cette date.

■ S'il faut également liquider le compte à vue, elle annule les cartes de débit et de crédit liées à ce compte et elle arrête les ordres de paiement et opérations dont l'exécution, sur ce compte, tombe dans le futur. Elle transfère ensuite le solde vers le nouveau compte à vue après en avoir déduit vos éventuelles dépenses effectuées via la carte de crédit et non encore portées en compte, ainsi que les frais prévus contractuellement (opérations payantes, intérêt pour compte à découvert,...). Enfin, elle clôture votre ancien compte à vue, sauf si la liquidation donnerait un solde négatif ou p. ex. si ce n'est pas possible pour une autre raison (compte bloqué suite au décès de votre conjoint, p. ex.). Le cas échéant, elle vous en informe.

■ Elle vous avertit une fois ses démarches terminées.

4 La nouvelle prend le relais

■ Si tout s'est déroulé comme prévu, la nouvelle banque introduit dans les sept jours suivant la date de transfert, tous les ordres de paiement sur le nouveau compte (si vous avez demandé ce transfert). Elle vous signale lorsque c'est fait et avertit les créanciers dont vous payez les factures par domiciliation.

► Autre faille majeure : il ne s'agit que d'un code de conduite, qui n'a pas force de loi.

D'une part, les banques sont libres d'y adhérer ou non et elles peuvent s'en retirer à tout moment (à ce jour, 27 banques, parmi lesquelles les plus importantes, ont adhéré au code). D'autre part, aucune sanction n'est prévue en cas de non-respect du Code.

Enfin, certaines règles sont formulées de manière très souple pour les banques ; ainsi, le Règlement du Service de mobilité interbancaire énonce que "la nouvelle banque et l'ancienne banque ne peuvent pas être tenues pour responsables de ralentissements ou d'une exécution non conforme du service de mobilité interbancaire résultant d'une exécution tardive ou incomplète par des tiers", ce qui ouvre la porte à des interprétations abusives.

La Commission européenne a demandé à chaque Etat membre de procéder à une évaluation détaillée du Code et de sa mise en application ; en Belgique, c'est le Conseil de la Consommation (dont Test-Achats est membre) qui est



POUR CHANGER DE BANQUE, ADRESSEZ -VOUS À LA NOUVELLE, PAS À L'ANCIENNE

chargé de cette tâche.

De notre côté, nous avons voulu procéder à un certain nombre de vérifications, notamment sur le terrain, pour voir comment cela se passe en pratique.

Info difficilement accessible sur les sites des banques

Dans un premier temps, nous avons consulté les sites internet de quelques banques afin de vérifier si l'information relative au Code de conduite y est bien présente.

> Nous avons commencé par celui de Febelfin. Il est très complet : Code en lui-même, brochure explicative, document de demande à signer, liste des banques participantes et lettres types pour prévenir les tiers. Seulement, les consommateurs consultent rarement (pour ne pas dire jamais) les sites des fédérations professionnelles ; ils ont plutôt le réflexe, bien légitime, de consulter directement les sites des banques.

> Sur le site de BNP Paribas Fortis, c'est le contraire : nous n'y avons pas trouvé la moindre information au sujet du Code de conduite ! Sur les sites de ING et KBC, les informations sont présentes mais il faut chercher pour les trouver ; chez ING, nous avons ainsi dû taper "mobilité interbancaire" dans le moteur de recherche du site pour y accéder. Le site de Dexia est le plus satisfaisant à cet égard : la page d'accueil contient un onglet "Changer pour Dexia" qui donne quelques mots d'explications sur le Service de mobilité interbancaire et renvoie vers différents documents, dont la brochure de Febelfin et le formulaire de demande.

Les agences pas toutes au courant

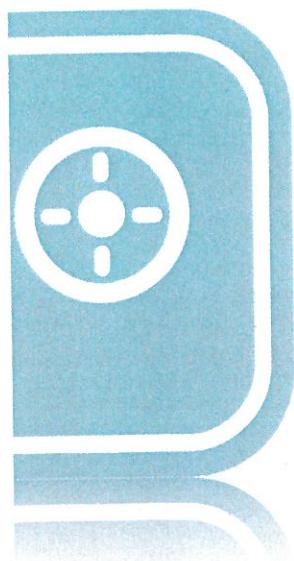
Nous avons également effectué un coup de sonde sur le terrain. Deux de nos enquêteurs se sont présentés dans différentes banques en y annonçant qu'ils souhaitaient y transférer leur compte à vue. Pour Rabobank, ces contacts ont été pris par téléphone ou via internet. Nos enquêteurs ont noté la réaction de leur interlocuteur et observé si la procédure leur était familière.

Précisons qu'une seule agence par enseigne a été visitée ; il ne faut donc pas généraliser l'attitude du guichetier concerné. Une visite dans d'autres agences aurait peut-être donné un résultat fort différent.

En tout cas, les résultats de ce coup de sonde ci sont très mitigés. Chez Argenta, Deutsche Bank et Rabobank, l'employé était parfaitement au courant de la procédure, il l'a expliquée et a effectué les démarches nécessaires.

ILS ONT FRANCHI LE PAS

Parallèlement à l'examen des sites internet et à notre coup de sonde sur le terrain, nous avons demandé au printemps dernier à ceux qui avaient récemment changé de banque de nous faire part de leur expérience. Petite synthèse des 199 réponses reçues.



75 %

ont quitté une grande banque, essentiellement parce qu'ils étaient mécontents du coût du compte et/ou de la banque en général

25 % n'ont pas prévenu la nouvelle banque de leur intention de transférer leur compte à vue vers elle

60 %

ont averti (aussi) leur ancienne banque

20 % ont longtemps hésité à transférer leur compte à cause de la lourdeur des démarches

46 %

estiment que transférer son compte est simple

18 %

estiment que ce ne l'est pas du tout

75 %

disent que le banquier (ancien ou nouveau) n'a pas évoqué spontanément le service de mobilité interbancaire

pourtant, **45 %** estiment avoir été bien aidés par leur nouvelle banque

Ajoutons que beaucoup se plaignent du fait que le transfert des domiciliations a été mal opéré ou en tout cas tardivement, ce qui leur a valu des rappels de la part des créanciers concernés (fournisseur d'énergie, opérateur de téléphonie,...) et des intérêts de retard.

AUTRES PRODUITS BANCAIRES

Comment procéder et à quoi faire attention?

■ Compte d'épargne : attendez si possible que la prime de fidélité ait été payée. Virez ensuite le solde de votre compte d'épargne sur votre ancien compte à vue, puis transférez-le à votre nouvelle banque. Les intérêts sont réglés à la clôture du compte.

■ Compte à terme : attendez l'échéance et demandez au banquier de ne pas réinvestir automatiquement le solde. Dès que le montant se trouvera sur votre ancien compte à vue,

transférez-le sur votre nouveau compte.

■ Compte titres : vous pouvez demander à votre ancienne banque de transférer les titres sur votre compte titres ouvert auprès de la nouvelle banque, mais ce transfert est souvent payant (entre 25 et 40 € par ligne de titre).

■ Assurances : elles ne se transfèrent pas. Vous devez les résilier d'un côté (en respectant un certain délai de préavis) et souscrire de

nouveaux contrats de l'autre.

■ Crédits : ils ne se transfèrent pas non plus. Vous devez les rembourser totalement (grâce éventuellement au crédit souscrit auprès de la nouvelle banque) et repartir à zéro de l'autre côté. Sachez que rembourser un crédit de manière anticipée peut occasionner des frais : indemnité de remplacement (p. ex. 3 mois d'intérêts), frais de dossier, d'expertise, de mainlevée d'inscription hypothécaire, etc.

Chez Dexia, l'employé a lui aussi spontanément déclaré que le transfert pouvait être effectué automatiquement, mais il a fait remplir un mauvais document. Un collègue appelé à la rescoufle a toutefois immédiatement fourni le bon formulaire.

Chez KBC, l'employée a d'abord déclaré que la demande de transfert devait être remise à l'ancienne banque. L'enquêteur n'a toutefois pas dû beaucoup insister pour qu'elle s'en occupe.

Chez BNP Paribas Fortis, l'employée ne connaissait pas du tout la procédure de transfert de compte. Sur instance de l'enquêteur, elle s'est renseignée auprès de ses collègues, qui ont affirmé que le client devait faire le nécessaire auprès de sa future ancienne banque. L'enquêteur continuant à insister, elle a finalement téléphoné au siège central et, après 20 minutes en ligne, elle a enfin déniché le formulaire adéquat !

Chez ING, ce fut encore pire : les deux employés auxquels l'enquêteuse a eu affaire ne connaissaient absolument pas la procédure. Même lorsqu'elle leur a mâché le travail en leur glissant sous le nez le formulaire de demande (non complété), ils ne savaient qu'en faire. L'un d'eux lui a finalement suggéré de signer simplement le formulaire sans le compléter et de le lui remettre ; sans doute comptait-il faire appel à un collègue plus compétent... Mais, pas gêné pour un sou, il en a profité pour poser à l'enquêteuse (nom de une série de questions personnelles (nom de

l'employeur, p. ex.) et pour essayer de lui vendre une assurance-vie ! Dix jours après sa visite, l'enquêteuse n'avait toujours pas eu la moindre nouvelle de la part d'ING ; la banque ne lui avait même pas communiqué son nouveau numéro de compte ! C'est grâce aux derniers extraits de son ancien compte à vue (chez Dexia) qu'elle a appris que celui-ci avait été transféré vers le compte 363-XXX, ce qui est un compte ING.

> Même si ce coup de sonde n'a pas du tout la prétention d'être exhaustif, il est frappant de constater que, dans ce cas précis, les employés des (plus) petites banques étaient clairement mieux au courant de la procédure que ceux des ténors du marché. Il est vrai que les clients qui transfèrent leur compte vers une grande banque sont plutôt rares ; en général, ils font plutôt l'inverse...

En tout cas, il est pour le moins choquant de constater que certains employés de banque ne connaissent pas du tout la nouvelle procédure de transfert, ou la connaissent mal ; en renvoyant nos enquêteurs vers leur ancienne banque pour régler toutes les formalités, ils font exactement l'inverse de ce qui est prévu dans le Code de conduite qui prévoit que le consommateur n'a qu'un seul interlocuteur, sa nouvelle banque. ■

PLUS D'INFO

Formulaire de demande de transfert, lettres type, etc. :
www.febelfin.be/febelfin/fr/mobilite

VOUS DEVEZ COMMUNIQUER VOUS-MÊME VOTRE NOUVEAU NUMÉRO DE COMPTE À VOS DÉBITEURS



Pour nos abonnés

► Pour trouver les comptes à vue les moins chers pour vous parmi 80 formules.

www.test-achats.be/comptevue

NOUS EXIGEONS

Des mesures plus contraignantes

■ L'ancien dossier personnel de mobilité bancaire s'est avéré être un échec. Et le nouveau Service de mobilité interbancaire ne va selon nous pas assez loin : le consommateur doit encore se charger lui-même d'une bonne partie des formalités. De plus, comme le montre notre coup de sonde, il est encore fortement méconnu.

■ Nous ferons donc valoir auprès de la Commission européenne que le Code de conduite n'est pas satisfaisant à nos yeux. Nous estimons qu'il s'avère nécessaire de prendre des mesures plus strictes à cet égard. Rappelons qu'un code de conduite n'a pas de valeur contraignante.

■ Nous rappelons que favoriser la mobilité bancaire est un facteur important pour augmenter la concurrence entre les banques.

■ Nous plaidons depuis longtemps pour la portabilité des numéros de compte bancaire, à l'instar de la portabilité des numéros de GSM : le consommateur qui change de banque pourrait conserver le même numéro de compte. Mais nous continuons à nous heurter à un refus catégorique de la part du monde bancaire.

■ Face à ce refus, nous proposons un système qui combine les critères suivants :

- > exécution de toutes les formalités par les banques elles-mêmes;
- > durant le processus de changement, un seul interlocuteur pour le consommateur;
- > des délais précis stipulés à l'encontre des banques;
- > la gratuité totale pour le consommateur;
- > le tout coulé dans une loi.

ANNEX 11

MYSTERY SHOPPING – SLOVENIA

In January 2010 the Slovenian Consumers' Association decided to examine how banks in Slovenia observe the new Code of Conduct regarding bank account switching. We decided to adopt the method introduced by Test-Achats/Test-Aankoop, with only one difference – we have not done mystery shopping with real accounts, but just by visiting banks for information.

Web pages

We started the test in mid-January with examination of web pages. We visited the web pages of 16 Slovene banks and three saving banks. We only left out one bank because it targets mainly legal entities and rarely private individuals.

First we checked the home pages and searched for any information regarding bank switching. Just one bank had information regarding this topic and one had a connection to the Slovene Banking Association where detailed information regarding switching is available. We continued our search among information regarding different kinds and types of bank accounts. If there was any information given on this topic we found it mostly in this area. Seven banks had information on bank switching among their information about current accounts. To make sure, we also tried to find data on bank account switching with search engine available on banks' web pages. We succeeded only with five banks. Still eight banks had no information regarding bank account switching.

Results:

- 7 banks have information regarding bank account switching available on their web pages (6 out of this 7 banks have also a connection to information about switching available on web pages of our Banking Association)
- 4 banks have only a connection to information available on the web pages of Slovene Banking Association and no extra description
- 8 banks have no data at all available on their web pages

Personal visits to banks

In January we visited 16 banks and two saving banks which have branches in Ljubljana. First we checked for data available without going to a bank counter and then we asked for information in person from bank employees.

Results – information available in the bank branch on information stand:

- 6 banks have no brochures from Slovene Banking Association regarding bank account switching
- None of the banks have application for switching bank available on information stand

Conclusions after examining banks' information stands:

- Brochures from Slovene Banking Association are usually placed somewhere behind and are not well seen, they are hard to find and in some cases they are not available at all.

Results – information given to our mystery shopper by bank employees:

- When our consumer explained she wants to open a bank account, only 8 banks mentioned a bank switching process.
- After our mystery shopper mentioned the process, 9 banks gave her the application form for switching bank.

Conclusions made after personal visit:

- In some cases bank employees are not informed about bank switching process. For this information a consumer has to make an appointment with a bank 'advisor' and cannot just talk to a bank employee at the counter. It happened also that bank advisors did not mention the procedure until our consumer directly asked about it.
- When talking about bank switching process bank employees mostly advise not to opt for this procedure because it usually takes longer time than when consumer takes action by himself. They say that according to previous experience the old bank delays with sending the necessary data and so the process takes longer time.
- Foreign banks tend to be more consumer-friendly and provide them with more information on this topic.
- Too many bank employees are not well informed with the bank switching process.
- Some bank employees took too much time to convince our mystery shopper not to take this procedure even though she was determined to switch bank this way.
- Most banks are not willing to give their application for switching bank to consumer to take home. They rejected her request by answering that she will get it when she comes to open an account

ANNEX 12

CLOSURE OF THE FORMER ACCOUNT – ITALY

Below are some complaints with regard to switching delays received from Italian consumers:

- A consumer asked to close the current account with IWBank. Time foreseen for the closure was 20 days. After more than 2 months the current account was still open. There were around 250 Euros on the 'former' account.
- At the beginning of March 2010 the consumer asked for the closure of the current account with UBI Banca di Varese and returned the checkbook and the credit card to the bank. The current account was not linked to a deposit of securities, and the consumer left 52.43 Euros for the payments of banking operations. In September (after 6 months), the banks closed the current account and transferred to the new bank only 8.55 Euros; the remaining amount was used to pay the different operations needed for the account closure. UBI Banca di Varese is a member of Patti Chiari which obliges banks to indicate in their pre-contractual information how many days are needed to close a current account. In this case the bank had informed the consumer that the closure would take 29 days. Consumer asked for reimbursement of all the fees concerning the last 4 months. The bank refuses to reimburse the consumer.
- At the end of January 2010 the consumer asked to close his current account with Banca Carige, while the account was overdrawn by 10 Euros. The operator said that they would contact him in order to communicate the data for the transfer. In October (after 9 months) the operator called the consumer saying that the current account was not closed and the consumer has to pay 70 Euros of management fees for the last 9 months.
- In July 2009 the consumer asked to close his current account with Banca Nazionale del Lavoro. The consumer filled in the questionnaire and the operator cancelled the ATM card. At the beginning of December (5 months later) the bank called the consumer to inform that the current account was overdrawn and that it should have to be closed. Then, the consumer wrote to the bank in order to close the current account and to receive back the amount present on the current account at the moment of the closure request. The problem is still unsolved and the bank continues to send letters informing the consumer that the current account is till overdrawn.
- On 19 September 2010 the consumer asked to close his current account with IWBank and to transfer the account balance to the 'new' bank. The consumer did not have a credit card with the IWBank, and the ATM card was never used, so the closure operation should have been quite simple. On 4 November (2 months later) the current account was still open.

- At the beginning of June 2010 the consumer asked (by letter) for the closure of his deposit account with IWBank, and after one week he received an acknowledgement of receipt. At the end of August the account was still open and the consumer asked the reason for that. The next day the bank answered that there is no particular reason and that it will close the current account as soon as possible. On 10 October (4 months later) the current account was still open.