

(English version)

**Question for written answer E-002332/26
to the Commission
Markéta Gregorová (Verts/ALE)
(8 June 2026)**

Subject: Euronet ATM dark patterns

Regular reports from independent users of Euronet ATMs have shown that the company has been using dark patterns to deceive consumers into making choices that are less financially sound. More specifically, the ATMs make fee information confusing by displaying a misleading ‘total amount’ that does not reflect the actual amount charged ⁽¹⁾. The software also adapts the pre-defined withdrawal amounts depending on the country and currency associated with the card. Moreover, the ATMs display the least favourable options first and more prominently ⁽²⁾ or do not give users with euro accounts the option of withdrawing euro in order to charge conversion fees ⁽³⁾.

1. Does the Commission consider these practices to be in line with the Unfair Commercial Practices Directive ⁽⁴⁾, particularly Articles 5, 6 and 7 thereof, with regard to the information provided and how it is displayed?
2. Does the Commission consider that changing pre-defined withdrawal amounts depending on the card and not allowing euro withdrawals from euro accounts could distort the behaviour of a specific group of consumers, as set out in Article 5(2) (b) of the Unfair Commercial Practices Directive?
3. Does the Commission consider that the information on the fees charged is sufficiently clear and accessible, as required by the Cross-Border Payments Regulation ⁽⁵⁾?

Submitted: 8.6.2026

**Answer given by Mr McGrath on behalf of the European Commission
(18 September 2026)**

The directive 2005/29/EC ⁽¹⁾ prohibits misleading practices by traders, including misleading actions or omissions about the price or the manner in which the price is calculated.

It is transposed in national laws and Member States authorities and courts deal with its enforcement regarding specific traders, considering all the circumstances and the impact of specific commercial practice on the average consumer’s transactional decision. Directive 2005/29/EC acts as a safety net complementing more detailed requirements provided in sectoral EU law.

Specifically, Article 4 of the Cross-Border Payments Regulation (CBPR) ⁽²⁾ requires providers of currency conversion services at an automated teller machine (ATM) to express the total currency conversion charges as a percentage mark-up over the latest available euro foreign exchange reference rates issued by the European Central Bank.

This information must be clearly displayed at the ATM before the transaction is initiated. It is for the national competent authorities and courts to enforce these rules.

The forthcoming revised legislative framework on payment services ⁽³⁾ aims to improve the effective supervision of independent ATM deployers and the application of transparency requirements, by requiring those deployers to register with the national competent authorities where the cash withdrawal services are provided. The new rules will also bring greater detail to the transparency obligations with which these operators must comply.

In addition, the Commission is working on a proposal for a Digital Fairness Act, which aims at strengthening consumer protection in the digital environment, including as regards so-called ‘dark patterns’.

¹ <https://www.youtube.com/watch?v=5Dg2aecGiYQ>.

² <https://www.youtube.com/watch?v=x46gF0I90ss>.

³ <https://www.youtube.com/watch?v=Ga8drZbLi-s>.

⁴ Directive 2005/29/EC of the European Parliament and of the Council of 11 May 2005 concerning unfair business-to-consumer commercial practices in the internal market and amending Council Directive 84/450/EEC, Directives 97/7/EC, 98/27/EC and 2002/65/EC of the European Parliament and of the Council and Regulation (EC) No 2006/2004 of the European Parliament and of the Council (‘Unfair Commercial Practices Directive’) (OJ L 149, 11.6.2005, p. 22, ELI: <http://data.europa.eu/eli/dir/2005/29/oj>).

⁵ Regulation (EU) 2021/1230 of the European Parliament and of the Council of 14 July 2021 on cross-border payments in the Union (OJ L 274, 30.7.2021, p. 20, ELI: <http://data.europa.eu/eli/reg/2021/1230/oj>).

⁽¹⁾ Directive 2005/29/EC of the European Parliament and of the Council of 11 May 2005 concerning unfair business-to-consumer commercial practices in the internal market.

⁽²⁾ Regulation (EU) 2021/1230 of the European Parliament and of the Council of 14 July 2021 on cross-border payments in the EU.

⁽³⁾ Proposal for a regulation of the European Parliament and of the Council on payment services in the internal market and amending Regulation (EU) No 1093/2010; Proposal for a directive of the European Parliament and of the Council on payment services and electronic money services in the internal market amending Directive 98/26/EC and repealing Directives 2015/2366/EU and 2009/110/EC.