Compliance Update

New rules for installment payments: What changes and how ablefy supports you

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Ulrike Kürschner
CFO, ablefy



Mario Schoepe
Head of Customer Success, ablefy

Here for you today



Ulrike Kürschner

CFO, ablefy

Business graduate and certified banking professional with more than 20 years of experience in fast-growing e-commerce and software companies, especially in finance and compliance



Mario Schoepe

Head of Customer Success, ablefy

17 years of experience in the tech and e-commerce sector, with a focus on account management.

Agenda

01 What changes?

02 Which payment models still work?

03 What does ablefy take care of for you?

04 What does this look like in practice?

05 Your questions, answered live

Chapter 01

What changes from 20 November 2026?

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What does the new Consumer Credit Directive cover?

What it changes

The new EU Consumer Credit Directive replaces the 2008 rules, broadens the definition of consumer credit and adds further rules for it.

Its goal

To better protect consumers from over-indebtedness.

Who it applies to

Applies to sales to private individuals in the EU. What counts is the location of your customers, not your own.

What is new from 20 November 2026

01

Exceptions fall away

0% installments on your own invoice, buy now, pay later (BNPL) and small loans under €200 are no longer exempt and are also covered by the new requirements.

02

Payment after the service is credit

If you deliver first and collect from the private customer later, you are legally granting a consumer credit and effectively become a bank.

03

New obligations apply

Documented credit check, pre-contractual information (SECCI) and an official permit or registration.

> But if you adapt your portfolio smartly with ablefy, you can improve your own cash flow and still give your customers the flexibility they need!

What can happen in case of violations

Fine

up to €500,000

For installment payments without the required permit or breaches of the obligations, up to €50,000 or up to €500,000 depending on the case.

Right of withdrawal

1 year and 14 days

Customers can withdraw for this long if pre-contractual information is missing.

The ablefy platform is safe and protects you from negative consequences. Offers sold after 20 November need to be adjusted. ablefy supports you with the adjustment.

Chapter 02

Which payment models are safe?

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The basic rule

Payment before or during the service is not credit.

Payment after the service is.

What can I offer after 20 November?

Payment model	Example	Assessment
Ongoing service with matching payment	Membership, subscription, coaching with monthly payment	Not credit; fixed term of up to 24 months possible
Down payment	Event ticket in installments until the event	Not credit
Purchase on invoice	One-time payment with payment term	Not credit up to a 14-day payment term, up to 50 days for SMEs[1]
Payment only after the service	8 weeks of coaching, but 8 months of payments	Counts as consumer credit and is offered securely via ablefy BNPL partners[2]

1) SME = small and midsize enterprises, definition in the annex
2) depends on the customer’s creditworthiness, additional costs apply

Chapter 03

Which solutions does ablefy offer you?

Model 1: Selling in your own name

You don’t need a credit intermediary license

ablefy holds the master license (§ 34k GewO).

The sub-account structure legally frees you from checks.

All payment methods available

One-time payment, down payment, ongoing payments and BNPL. ablefy handles everything.

With BNPL, the partner (Klarna, PayPal) handles the credit check and all further obligations.

50-day payment term

SME privilege (§ 506 BGB): you can offer your own payment terms of up to 50 days (one-time payments).

ablefy takes on liability, taxes and compliance. With vetted BNPL partners, you receive your money immediately, with no default risk. That means better cash flow and maximum sales freedom.

Model 2: Reseller as an all-round worry-free package

Zero seller liability

The ablefy reseller acts as the seller and carries all obligations for taxes, terms and conditions and credit laws.
The credit intermediary license under the GewO is in place.

All payment methods available

One-time payment, down payment, ongoing payments and BNPL. ablefy handles everything.

With BNPL, the partner (Klarna, PayPal) handles the credit check and all further obligations.

14-day payment term

Payment terms on invoices of up to 14 days after delivery are built in directly, without credit requirements.

ablefy takes on liability, taxes and compliance. With vetted BNPL partners, you receive your money immediately, with no default risk. That means better cash flow and maximum sales freedom.

ablefy supports you as a partner

Vetted and exclusive BNPL partners

ablefy negotiates with leading partners as equals, and with large banks even exclusively. That way we make sure you sell safely and in compliance.

Advice on switching and cash flow improvement

- How can I adjust my portfolio smartly and without risk?
- What options do I have to receive my cash faster?
- How can I even increase my cash flow and make sure it stays with me?

Chapter 04

What does this look like in practice?

Event ticket in 12 monthly installments

Situation

Your customers pay for a ticket in 12 installments before the event takes place.

Assessment

Allowed. The money arrives before the service, so this is a down payment and not credit.

How to implement it

If an installment stays open, the ticket must be blocked.

No credit check and no SECCI forms needed.

Pausing installments during a payment squeeze

Situation

A customer asks whether they can pay the last installment later.

Assessment

Allowed, as long as you charge no interest and no fees for it.

How to implement it

Invoices keep running and a dunning and debt collection stop is possible. No cancellation and no new agreement with a later invoice date.

> Interest or deferral fees turn a goodwill gesture into regulated credit.

Restructuring an online course (without live sessions)

Before

3-month course, instant access to 6 chapters

Installment payment over 6 months

Regulated from 20 Nov, because installments run after the service

New

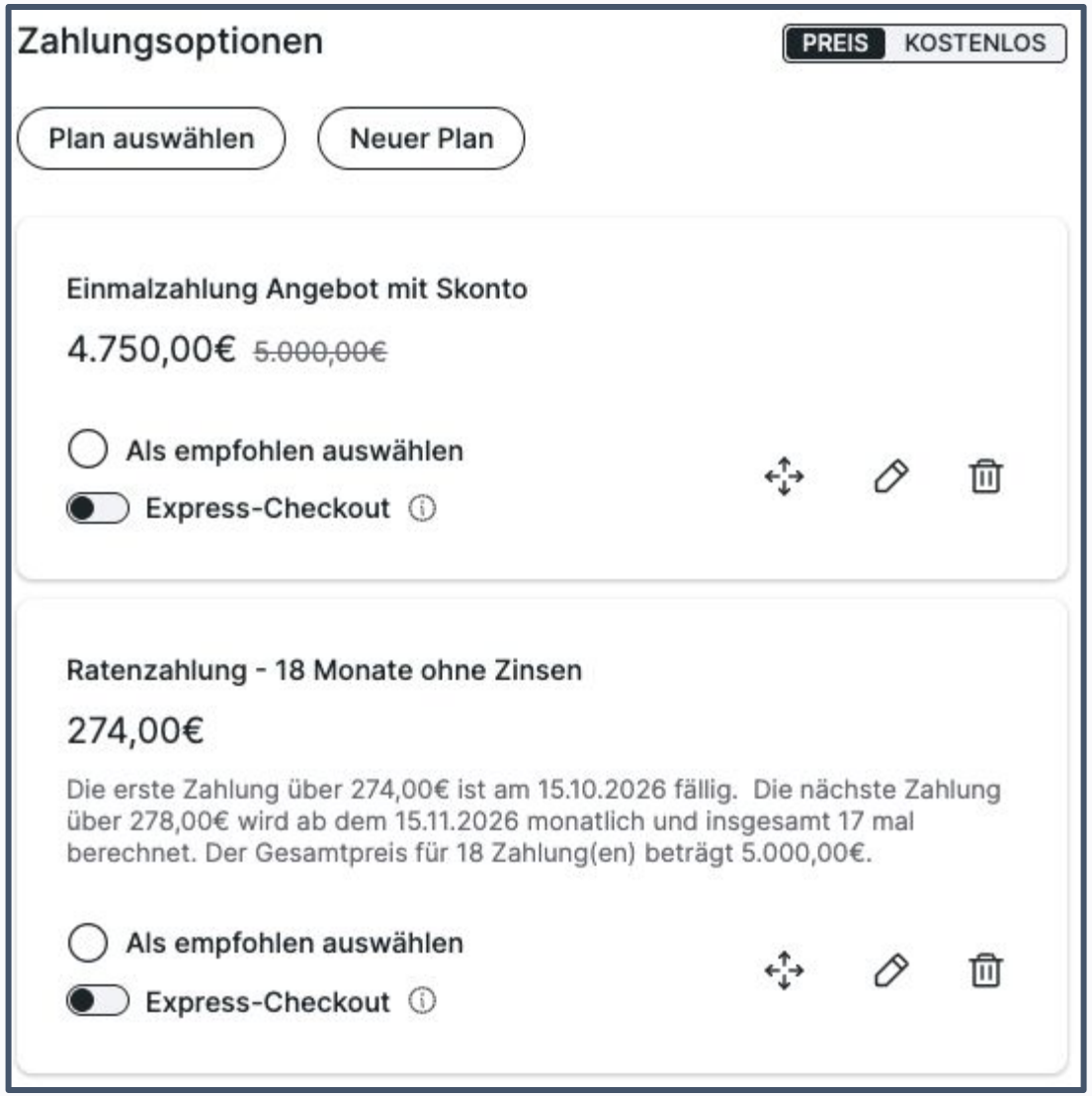
- 6-month course; 6 chapters. Access to the next chapter is unlocked once a month (drip-in).
- Payment over 6 months from the purchase date

Or: installment payment through one of our Buy Now Pay Later partners.

How it works in ablefy

Set service periods

1. Where to find the setting in ablefy
2. What to enter there
3. What your customers will see as a result



Your questions

Ask them in the chat now. Ulrike and Mario will answer them live.



What happens next

Review pricing plans

Which of your offers use installments after the service?

Rebuild offers

Down payment, ongoing service or subscription instead of installments afterwards.

Set service periods

Compliance Update · Follow-up

CCD2 Q&A: Your questions on installment rules, answered live

The follow-up to the webinar of 15 Oct, hosted by ablefy Customer Success

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Oct 21

Wednesday · 6 pm · online



Shpend Jashari
Customer Success Manager, ablefy



Christin Kodalla
Co-host,
ablefy

Thank you for joining

See you at the next ablefy webinar.

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Annex

What is an SME?

What are SMEs (according to EU Recommendation 2003/361/EC)**?**

Definition of small and midsize enterprises (SMEs)

Headcount

Fewer than 250 employees.

This must always be met!

Annual turnover

Under €50 million.

Annual balance sheet total

Under €43 million.

As long as only one of these two criteria is exceeded, the company still counts as an SME. If both financial figures are exceeded, it no longer does.

Affiliated companies / group structures: If another company holds more than 25% (partner company) or more than 50% (affiliated company) of the shares, their headcount and financial figures must be added proportionally or in full, respectively.
Meaning in the CCD2 context for Normal Sellers: Under German consumer credit law (§ 506 BGB), almost all typical coaches and creators fall under this definition.