CELENT

BANKS, RETAILERS, AND FINTECH: REIMAGINING PAYMENTS RELATIONSHIPS

PART ONE: THE BANK PERSPECTIVE

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January 2016

This report was commissioned by ACI Worldwide, at whose request Celent developed this research. The analysis and conclusions are Celent's alone, and ACI Worldwide had no editorial control over report contents.

OLIVER WYMAN

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INTRODUCTION

Imagine a family of three generations:

- Of the **two kids**, one is in her late teens, and another in his early 20s. They are full of energy, optimism, and youthful exuberance. Technology is second nature for them, although they sometimes find it difficult to connect with people in the “physical space.” While incredibly smart, the teens occasionally display a hint of naiveté about how the real world works. Unencumbered by the past, they have visions of changing that world and writing history themselves.
- Their **parents** are in their late 40s. They are doing well and hold respectable jobs, but feel hassled and harried by the pressures of life, “keeping up with the Joneses” and particularly, the speed of change around them. They also hold a bit of a grudge against the older generation; they don’t think parents have done enough for them, having spent most of their life “in it for themselves.”
- It is true, the **grandparents** are still fairly wealthy, but they also have bills to pay. Those bodies are starting to creak a bit; their grandkids call it “a legacy challenge.” They never had the best of memories, and these days often find that their “right hand doesn’t know what the left one is doing.” The rapidly changing world frightens them; they don’t want to become irrelevant, and secretly hope that it’s all a fad that will just go away.
- There is a **rich uncle** who likes nothing more than to indulge the kids and throw money at their latest ideas. He knows that many of those ideas will come to no good, but the thought that one of them just might change the world keeps him coming back for more.
- There is also a **mean uncle** who has taken on the mission to keep the family in check and make sure they don’t misbehave. He takes his role rather seriously and meddles quite a bit, although not always consistently. As a result, none of the family like him that much, and most think he is against them.

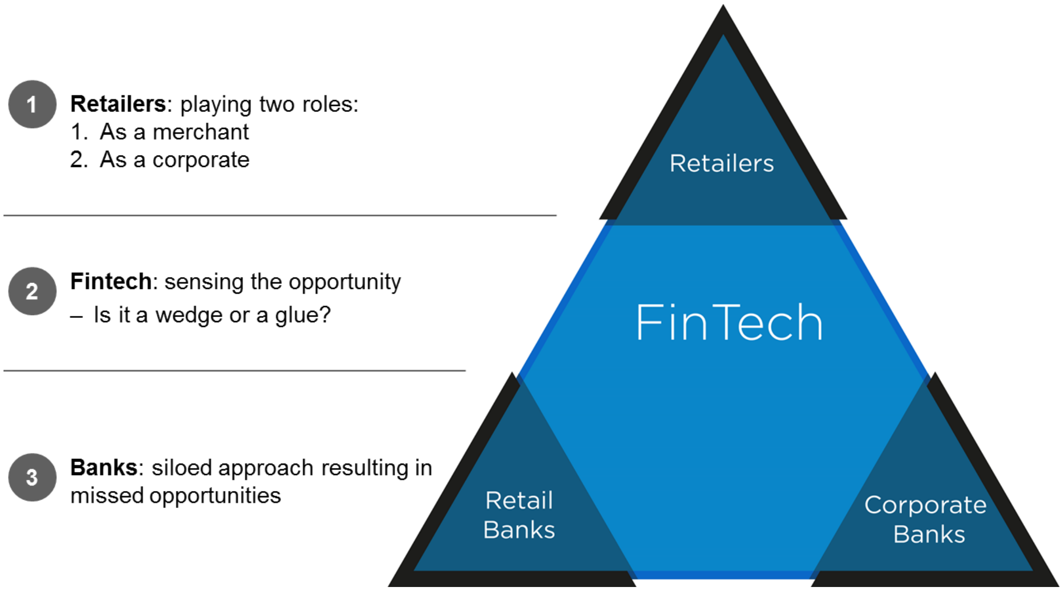
Now, replace the kids with Fintech, the parents with retailers, the grandparents with banks, the rich uncle with venture capital and private equity firms, and the mean uncle with a regulator, and read the text again. Sound familiar? Indeed, just like a family is locked into a set of relationships, banks, retailers, and Fintech form a payment ecosystem that we believe is more symbiotic than many would want to admit.

As merchants that sell goods, retailers care about accepting payments efficiently and effectively. As corporates, they also have various other needs, from physical cash management to borrowing money and paying suppliers. Retailers traditionally have relied on banks to provide many of those services, although the relationship has often been strained. The merchants have long argued that the cost of payment acceptance is too high, and the silos between the retail and corporate sides of the bank have not helped to see a full picture of the relationship. Not surprisingly, retailers are increasingly susceptible to alternative solutions offered by technology firms.

Retail banks have been responsible for most of the payment instruments issued to consumers and used at merchant tills. As cheques declined, the growth in card payments has been remarkable, even though the use of cash remains at stubbornly high levels in most countries. Yet it is corporate banks that have the main relationship with retailers, and even though both sides may belong to the same universal bank, they often operate in silos. If the bank is also an acquirer, those operations would typically be in another siloed unit.

Fintech firms sense the opportunity and are muscling in. What will their growing presence mean to the relationship between banks and retailers? Will it prove to be a wedge further driving them apart or the glue that bonds everyone together?

Figure 1: Banks, Retailers, and Fintech — A Symbiotic Ecosystem?



Source: Celent

We believe it is time to reimagine the payments relationships between banks, retailers, and Fintech. Combative stances and door slamming will only result in lost opportunities for all.

To reimagine those relationships, it is helpful to start by understanding the perspectives of each main party. Therefore, we have written three reports, with each exploring the perspective of a different stakeholder. This report looks at banks and examines three research questions.

Key Research Questions

1 *How real is the disruption in payments for banks?*	**2** *What are the risks?*	**3** *Do banks have a future in payments?*

HOW REAL IS THE DISRUPTION IN PAYMENTS?

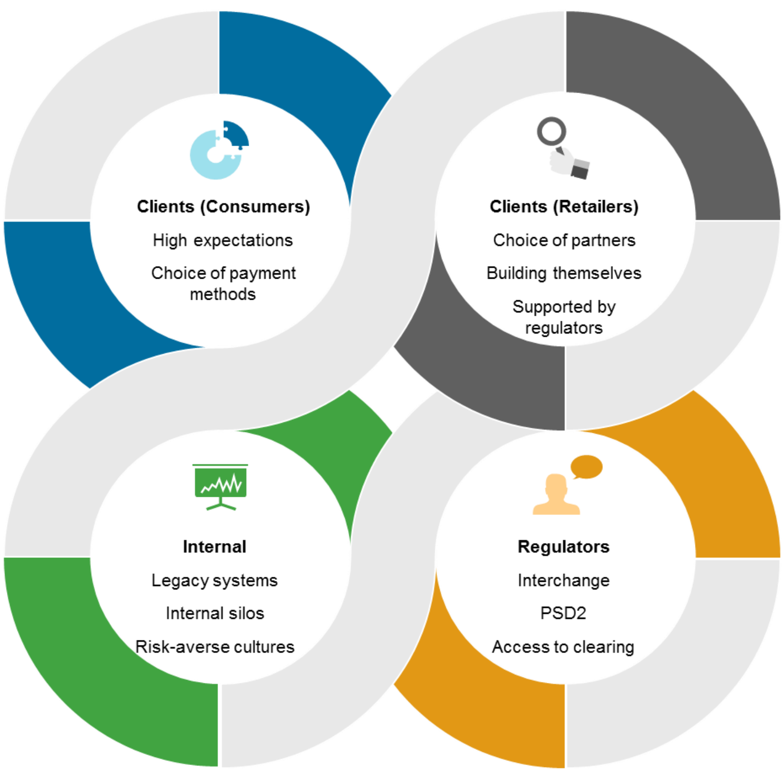
Banks Under Pressure

There is no doubt that banks are under real pressure in payments (see Figure 2). Consumers want to pay in a way that is easy and intuitive yet highly secure. They like to be rewarded for loyalty and frequent usage. And increasingly, they expect to be able to send and receive payments instantly. If Amazon can deliver goods on the same day, why should a payment take three days to arrive?

Increasingly, consumers have choice how to pay. This is particularly true in e-commerce space, which in many markets is already dominated by alternative payment methods. However, even in physical stores, cards and cash are being challenged by new payment methods. Starbucks is perhaps the most successful example of mobile payments at the point of sale (POS). According to the company, 16% of total transactions were done via its mobile app in 2014, and the number continues to grow. Looking further afield, mobile network operators play a key role in providing payments services in the emerging markets. As much as 40% — a staggering number — of Kenya's GDP flows through Safaricom's M-Pesa mobile money system.

Another set of banks' customers, retailers, also have choices over which payment methods to accept and which partners to work with. They are turning to Fintech providers not just for payments technology, but increasingly for other services as well, such as lending. In some markets, retailers even have ambitions to develop their own payments solutions; for example, MCX is a consortium of large merchants in the US that has developed CurrentC, a mobile wallet in pilot in Columbus, OH.

Figure 2: Banks Are Under Pressure in Payments



Source: Celent

Unfortunately, the regulators have not helped the banks. It is bad enough that the overall regulatory burden has increased dramatically since the last financial crisis in 2008; when it comes to payments, regulators often appear to favour nonbanks. From pressure on interchange all over the world to Payment Services Directive (PSD2) in Europe to changes in access to clearing in the UK, the regulators demonstrate time and again their desire to introduce more competition in the payments market.

In fairness, banks have not helped themselves either. They have been struggling to innovate under the strain of legacy systems, operational silos, and risk-averse corporate cultures. Furthermore, payments are only in the background when everything goes well; when it doesn't, payments suddenly become very visible. Just ask Royal Bank of Scotland or Barclays, two banks in the UK which experienced very public technical glitches in payments.

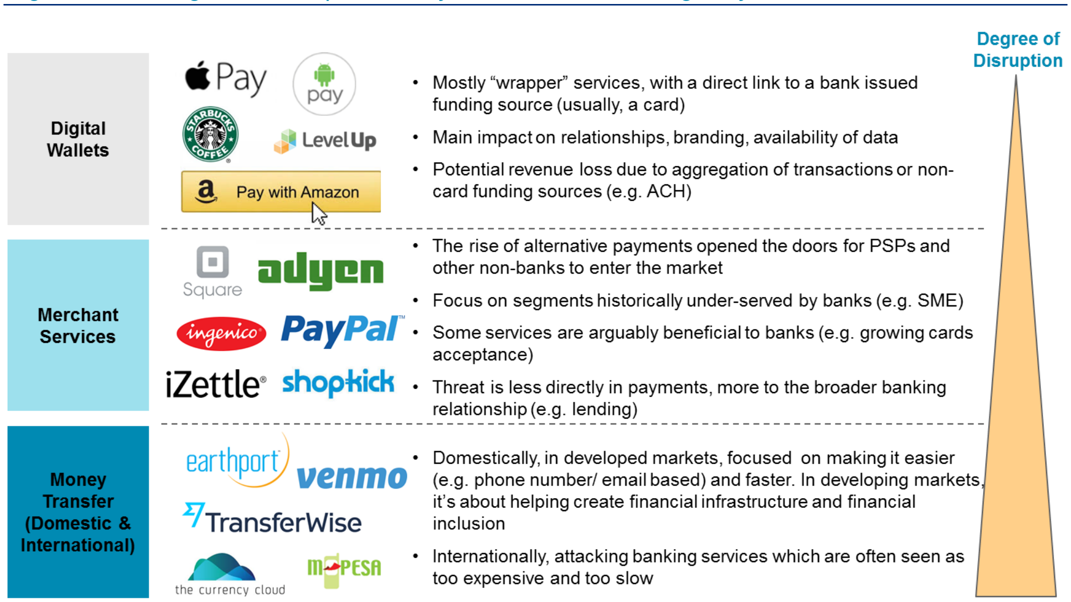
Disruption Has Not Equalled Disintermediation (Yet)

And yet, we contend that the degree of disruption in payments to date has been overstated (see Figure 3). Many talk about disruption as synonymous with disintermediation. There is no doubt that the disruption in payments has been real; however, the disintermediation effect has largely been contained, at least for now.

Disruption in payments manifests itself in the rise of three major risks (the 3Rs):

1. Loss of relationships (e.g., fewer customer interactions).
2. Loss of relevance (e.g., back of wallet).
3. Loss of revenue (e.g., fewer transactions).

Figure 3: The Degree of Disruption in Payments to Date Has Arguably Been Overstated



Source: Celent

Digital Wallets

Let's first consider digital wallets in their various shapes and guises. The majority of them are "wrapper" services with a direct link to a bank-issued payment instrument, usually a card. Some of them, such as Apple Pay and Android Pay, simply enable consumers to initiate a card payment from their mobile device. Although a token is used rather than the actual card number, for the merchant, the transaction looks just like a regular card transaction. Others, such as PayPal or Level Up, require customers to create an account and work with merchants to make sure they can accept that account. However, again, the transaction is usually funded by linking that account to a bank-issued payment instrument, either a card or sometimes a bank account.

We contend that the biggest impact of digital wallets on banks so far has been on relationships, particularly branding. While the customer has to actively load the bank card into a wallet, subsequently, bank and network brands are behind the wallet brand. There is a subtle but important shift in the consumer's mind from "I am paying with my Bank of America Visa card" to "I am paying with Apple Pay." In some cases, loss of relationships can also manifest in availability of data that the bank gets during the transaction.

Becoming and staying "top of wallet" has always been a key objective for banks. However, if it was hard enough to achieve in the days of plastic, it becomes even more difficult in digital wallets. There is a risk that it might be very difficult to displace the first card loaded by consumers, which might explain the rush of banks to join wallets such as Apple Pay.

On the other hand, the loss of revenue from digital wallets so far has been minimal. In some cases, banks are sharing revenue with third parties (e.g., Apple Pay in the US); in others, they might lose some transaction revenue due to aggregation (e.g., Starbucks, iTunes). Banks suffer the most when the wallets start drawing funds from their current accounts without an appropriate commercial model (e.g., PayPal funding via ACH). However, without real-time payments capability, this approach requires sophisticated risk management from the wallet provider. As long as cards remain the favourite funding source inside digital wallets, banks will continue to earn revenue from those transactions.

Merchant Services

This is an area of payments where startups and other technology firms are perhaps most active. However, in our view, the story of disruption in merchant services for banks is less about loss of their existing positions and more about missed opportunities. Furthermore, we believe that the main threat to banks in merchant services is not in payments, but in broader commercial relationships with merchants.

Historically, only banks could be acquirers for card transactions. To this day, many banks, such as Bank of America, Barclays, Chase, and Citi, continue to maintain strong positions in acquiring. However, they also face serious competition from technology firms, such as First Data, Vantiv, and Worldpay. Furthermore, proliferation of alternative methods online opened the doors for other nimble Payment Service Providers, such as Global Collect, Cybersource, Adyen, and many others to enter the merchant services market. Companies such as Stripe and Braintree are capitalising on the opportunity presented by rapid growth of mobile commerce.

While these firms compete for merchant relationships, many are actually "growing the pie" for issuers by creating new opportunities to pay by card. A well-known "payments disruption" tale is the story of Square, a company that in 2010 introduced a device enabling anyone with a smartphone to accept card payments. However, from a payments perspective, Square arguably helps banks: it opens a new market (small and micro merchants) neglected by large acquirers, and grows transaction volume for the issuers.

M-POS companies were among the first to recognise the opportunity that, in addition to payments acceptance, many small businesses need further technology support in running their business. Many now offer open platforms with a broad range of apps, in areas from accounting and inventory management to customer relationship management.

Banks may not have been expected to provide technology solutions to their merchant clients. However, as Fintech competitors gain knowledge about merchants, they expand the range of their services. PayPal, Square, and a number of other players started in payments but now offer lending to their retail customers. For example, PayPal recently announced that it has advanced US$1 billion to more than 60,000 entrepreneurs in the US, UK, and Australia through PayPal Working Capital, its cash advance programme for small businesses. That, in our view, is the biggest risk of disruption to banks in merchant services.

Money Transfer

Arguably, banks have seen the greatest disruption so far in money transfers — sending money from person to person, either domestically or internationally.

In the US, PayPal's Venmo captured the imagination of under-30s with its easy-to-use and social money transfers. According to *Fortune* magazine, Venmo is "the payments app millennials swear by." The app is so popular that it has become a verb, as in, "You can Venmo me later." Facebook Messenger allows users to send each other payments just like a normal message. Reports have emerged that Apple was in discussions about launching its own P2P payments service. Again, while the transaction may be funded by a debit card, the banks cede the front end customer relationships to others.

In the emerging markets, the story is about missed opportunities. Given lack of established financial infrastructure, mobile network operators and other players have stepped in. We already cited the incredible statistic that as much as 40% of Kenya's GDP flows through Safaricom's M-Pesa mobile money system.

In markets with real-time payments infrastructures, banks have managed to fight back and actually have taken the lead in P2P payments. For example, Swedish banks have developed an app called Swish, and in the UK, Barclays is leading with its popular PingIt app. Even in markets yet to move to real-time payments, such as the US, banks are trying to recapture their position in money transfers. Recent examples of activity include Early Warning acquiring clearXchange, BBVA partnering with Dwolla, and TD Bank exploring opportunities with Ripple.

However, it is in international transfers where bank revenues are most at risk. Not having to rely on complex and costly correspondent banking arrangements, the new breed of providers are offering consumers faster and more reliable international payments at a fraction of the cost. They also offer a much greater transparency for their fees, particularly on foreign exchange. One such company, TransferWise, became one of London's "unicorns" when it was valued at over $1 billion in a funding round earlier this year. According to *Payment Week*, since the company was founded in 2011, it has helped facilitate more than $4 billion of transfers through its services, yet only has about 450 employees.

Key Research Question

1

How real is the disruption in payments for banks?

The disruption is real; however, the disintermediation has largely been contained. It is difficult to displace banks in payments while they have privileged access to settlement in "central bank money."

As Celent explained in its July 2010 report *Taxonomy of Payments*: *Part I*, today only cash and money residing in bank demand deposit accounts qualify as money supply for any given currency. Without fundamental changes, no matter what payment methods are developed, they need to have a link back into the money supply to be broadly useful. Even credit card balances have to be paid off sooner or later, either in cash or via a bank transfer. Those bank transfers are typically settled via bank accounts held at the central bank. In other words, it is rather difficult to displace banks in payments while they have privileged access to settlement in "central bank money."

FASTEN YOUR SEATBELTS: MORE DISRUPTION AHEAD

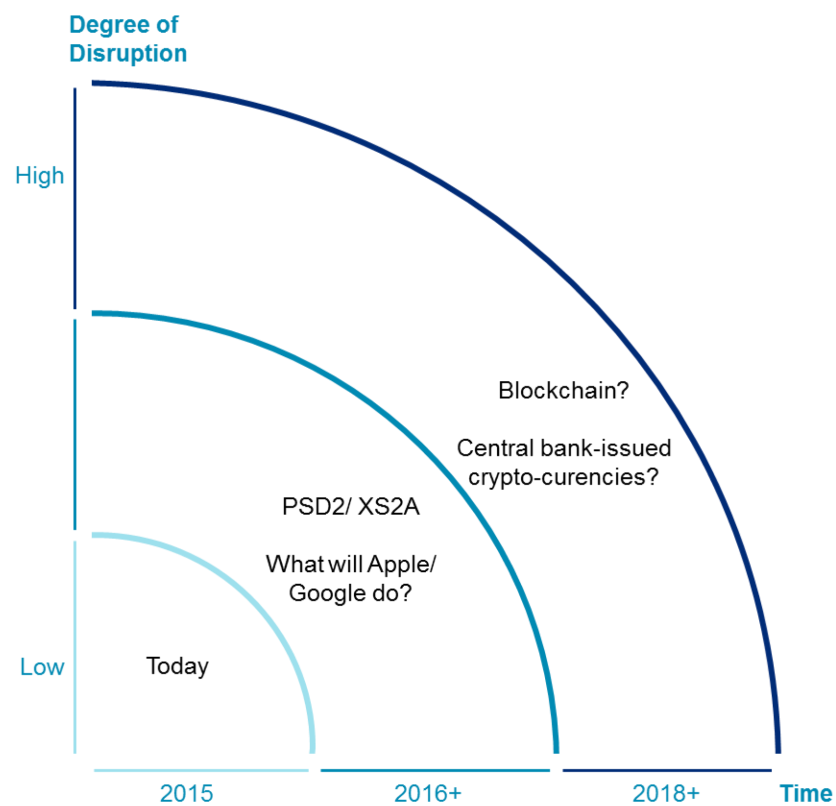
Although the disintermediation effect in payments has largely been contained, banks cannot afford to be complacent. Changes sweeping the industry suggest that there is a lot more disruption ahead, with potentially much more significant impact on banks.

Let's consider just the following four questions:

1. Will banks be relegated to the role of "pipes" and forced to lose more customer relationships when PSD2 and Access to Account (XS2A) become reality?
2. Will Apple, Google, or other technology giants decide they want to play a more active role in payments and financial services?
3. How will Blockchain technologies impact financial services?
4. What will happen if central banks decide to issue government-backed cryptocurrencies, enabling broad access to central bank money?

We expect this disruption to come in waves (see Figure 4). Banks have to be considering their response to the first two questions right now, while the other two represent a much higher degree of uncertainty. They are likely to play out over a longer timeframe, but may have even more far-reaching consequences.

Figure 4: Banks Should Expect More Disruption Going Forward



Source: Celent

PSD2 AND XS2A

Payment Services Directive II (PSD2) has the potential to be a major disruptive force in financial services and a real catalyst for innovation, at least in Europe. It has a number of important provisions around security of payments, pricing transparency and many other areas. However, the provision with perhaps the most far-reaching implications is the requirement for banks to open up access to their accounts to third parties (XS2A). According to the directive, banks will have to enable third parties to access their customer accounts for information, such as account balances. More importantly, third parties will have the right to initiate a payment on behalf of their customers directly from the customer's bank account. In other words, while banks will have to bear the cost of providing customers with a payments account, they will have to compete with third parties on who can provide the best customer experience.

It is hard to predict what the end game will look like, but we can certainly expect "personal financial management (PFM) on steroids" apps that aggregate a customer's financial data across multiple providers. Like "financial concierges," they would act in the customer's interest, advising which accounts to keep, when to move money from one account to another, where to invest, etc. We can also imagine new payments experiences. For example, a retailer might incentivise a loyal customer to download the app and register their bank credentials, creating a token in the retailer wallet. Every time the customer wants to pay — in store, in app, or online — the retailer just uses that token to initiate a push transaction from a customer's bank account to its own.

Obviously, there have to be rules of engagement — who is entitled to offer the services, under what conditions, what is the liability framework, what happens when things go wrong, and so on. European Banking Authority (EBA) is developing "Regulatory Technical Standards" that should address the necessary details. In the meantime, various industry bodies are proposing their visions of what is required, such as the Digital Infrastructure Layer described in the opinion paper by Euro Banking Association or the Controlled Access to Payment Services (CAPS) methodology proposed in the white paper written by Equens, Nets, and Vocalink, three leading European processors.

European banks will continue to offer mobile banking apps, but will have to up their game if they are to remain customers' preferred destination for interacting with bank accounts.

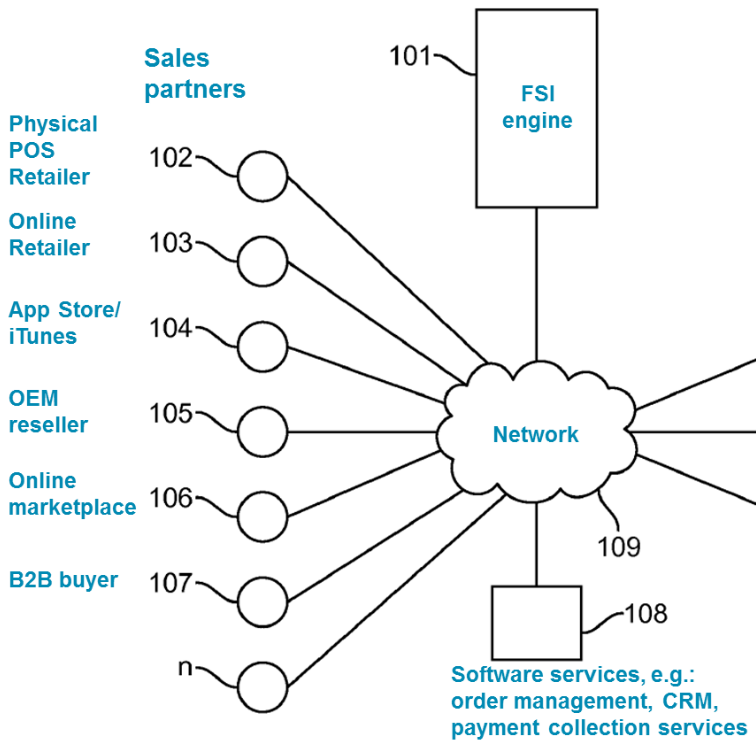
THE ROLE OF TECH GIANTS

Today, the technology giants such as Apple, Google, and others are happy to partner with banks to deliver their own branded payment solutions, such as Apple Pay and Android Pay. As consumers get more comfortable with these solutions, will their appetites grow? Will they want to play a more active role in payments and financial services?

Time will tell, but it is certainly a possibility. According to the Millennial Disruption Index survey, 73% of the millennials in the US would be "more excited about a new offering in financial services from Google, Amazon, Apple, PayPal or Square than from their own nationwide bank." Let's be clear — we are not suggesting that Apple and Google will become banks. However, they can certainly become hubs to facilitate relationships between consumers and financial services providers.

Could Apple become a "financial concierge" described in the previous chapter? Absolutely, especially in Europe when XS2A becomes a reality. Also, in our February 2014 report *Apple in Payments: What to Expect?,* we described Apple's patent application published on January 30, 2014 for a system where customers can pay for purchases using Loan ID obtained instantly from a financing partner. At the heart of such a system is the Financing System Integration (FSI) engine, which integrates POS, online store checkout platforms and other customer interfaces with financing partners. The customer could apply for a loan, automatically be approved, receive Loan ID, and use it to complete a purchase. Apple positions such a system in direct competition with credit cards, which would certainly have an impact on banks' revenues.

Figure 5: Financing Systems Integration: An Overview



Source: Apple's Patent Application, the US Patent and Trademark Office, Pub No: US 2014/0032392 A1

Blockchain in Banking

It has become a bit of a cliché to say, "It's not about Bitcoin, the currency, it's about blockchain, the technology behind it." Indeed, Bitcoin continues to be beset by image problems, not helped by its continued fluctuation in price, various scandals (e.g., Coin.mx) and a public civil war about the "block size." In the meantime, interest in blockchain and related distributed ledger technologies has grown exponentially, not least from the financial services establishment.

Chain.com, a startup describing itself as a platform on which "leading organizations [can] build next-generation financial networks," received investment from Capital One, Citi Ventures, Fiserv, Nasdaq, and Visa. Ripple, a distributed ledger based payments network, has partnered with Earthport and counts banks such as Fidor Bank, TD Bank, and RBC as clients. R3CEV is a collaborative initiative among some of the world's largest banks seeking to explore how to "design and apply distributed ledger technologies to global financial markets." R3 was launched in September 2015 with the backing of nine banks, such as Goldman Sachs, UBS, and JP Morgan. Since then, the number of participating banks has grown to 42[1] and includes Bank of America, Barclays, Citi, HSBC, SEB, National Australia Bank, Wells Fargo, and others.

It is clear that blockchain and distributed ledger technologies have captured the imagination of financial services players. However, unlike Bitcoin, which is a permissionless censorship-resistant network, banks are mainly looking at how distributed ledgers can be applied to ecosystems where the participants are known. Bitcoin

[1] As of 15 December 2015, http://r3cev.com/press/?category=Press+Release

proponents argue that, if you take away key ingredients of Bitcoin, you are left with little more than a clever database. Time will tell which side is right, but it is encouraging to see banks being proactive and exploring how such new technologies can be deployed to their advantage.

Central Banks and Cryptocurrencies

Banks are not the only ones looking at blockchain and cryptocurrencies. Researchers at the US Federal Reserve and the Bank of England have also started raising the question. What if a central bank issued its own cryptocurrency, for example Fedcoin? This would have huge repercussions to the industry.

If corporates and individuals had access to digital cash issued directly by the central bank, they would essentially have an account at the central bank and have access to direct settlement in central bank money with major impact on existing payment systems. Furthermore, *Business Insider*[2] recently commented on a draft report from HSBC which outlines how central banks could use blockchain to stimulate economy via "helicopter money" (i.e., injecting money into the economy directly, rather than by encouraging commercial banks to provide lending to businesses and individuals).

Where would that leave banks? They would have to compete with the central bank for accounts based on quality of their apps/wallets and other services, such as identity management and financial advice. However, if banks became starved of deposits, their ability to perform maturity transformation (i.e., create short-term deposits into long-term loans — the essence of banking) would be seriously compromised.

In February 2015, Bank of England published its One Bank Research Agenda spanning all aspects of central banking and focusing in particular on the intersections between policy areas. The questions the paper raised regarding central bank-issued digital currencies, listed here, illuminate the scale of potential impact on the industry:

- From a monetary and financial stability point of view, what are the costs and benefits of making a new form of central bank money accessible to a wide range of holders? What would be the impact on existing payment and settlement systems?
- What are the implications for government-backed deposit insurance if central bank money is widely accessible by households and businesses?
- Should central bank issued digital currency balances be remunerated and if so, should remuneration be linked to the official monetary policy interest rate? How would the monetary policy transmission mechanism then be affected?
- If transactions balances could migrate to digital currency, how would banks compete? Would there be any implications for the availability of credit?
- What would be the costs and benefits of different central banks using a common platform for issuing digital currencies? What type of distributed ledger technology would be most appropriate for a central bank backed system?
- How could institutions offering access to central bank issued digital currencies be regulated?

[2] http://uk.businessinsider.com/hsbc-says-the-blockchain-could-be-used-for-radical-central-bank-helicopter-money-policies-2015-11

Key Research Question

2

What are the risks?

Banks certainly cannot afford to be complacent: changes sweeping the industry suggest that there is a lot more disruption ahead, with potentially much more significant impact on banks.

GLANCING INTO THE FUTURE

It has become fashionable to pronounce that banks have no future. Celent does not subscribe to that school of thought. Doing so would risk ignoring the rich history of banking, from the Medici family in the 14th century and beyond.

Of course, we acknowledge the disruption and recognise that *banking is changing*. We simply don't agree that banks will disappear — at least not all of them. Here is why:

1. Today's smartest banks will figure out a way to stay relevant for their customers.
2. Some of today's disruptors will become banks.
3. Retailers, Fintech, and banks will acknowledge the value they each bring to the relationship and will learn to collaborate effectively.

For all their shortcomings, banks have managed to retain huge amounts of customers' trust. Some of it is down to pure inertia, but much of it is built on relationships based on providing core services safely and securely over many years. We believe that the smartest banks are going to leverage those relationships to stay relevant to their customers and expand a range of services, which they are well placed to deliver, such as instant financial advice or identity management services.

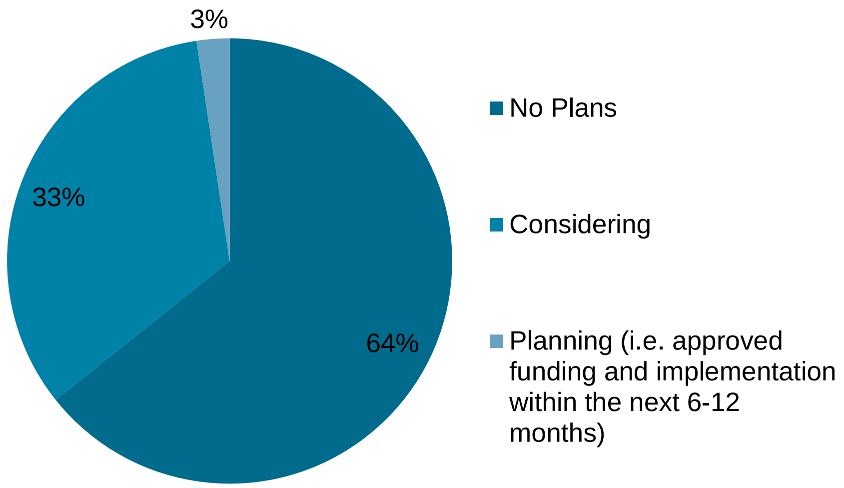
In the US, most disruptors, such as Moven, Simple, Dwolla, and many others set out to compete with banks without becoming banks themselves. By contrast, in the UK, a number of "challenger" banks are seeking or have already obtained a banking licence and are getting ready to tackle the industry challenges from within. PayPal, long the banking "disruptor in chief," has a banking license in Europe.

Finally, we clearly sense that the attitudes in the industry are beginning to change, with different parties starting to appreciate the value they each can bring and exploring ways to collaborate. In the Fintech world, BBVA bank acquired Simple in February 2014, and in March 2015, Moven announced partnering with Accenture to "jointly develop next-generation digital banking solutions … and to provide digital banking solutions to banks globally, enabling the banks to launch new digital capabilities faster and more cost-efficiently." *The Wall Street Journal*[3] recently quoted Ben Milne, the CEO of Dwolla, as saying, "Time humbles you. Working with banks is the difference between running a sustainable business and just another venture-funded experiment."

Even the often standoffish relationship between banks and retailers is starting to change. MCX, the consortium of retailers developing a merchant-friendly mobile payments solution, has long been perceived as the banks' enemy. Yet, in October, Chase sprung the biggest surprise of Money 20/20 by announcing it will be partnering with MCX to launch Chase Pay, its own mobile wallet. Perhaps even more surprising, a third of banks and credit unions surveyed by Celent via a Digital Research Panel in November 2015 said that they are considering partnering with MCX. A further 3% were in a firm planning stage, with funding approved and expected implementation in the next 6 to 12 months (see Figure 6 on page 14).

[3] *Banks and Fintech Firms' Relationship Status: It's Complicated*, Wall Street Journal, 18 November 2015 http://www.wsj.com/article_email/banks-and-Fintech-firms-relationship-status-its-complicated-1447842603-lMyQjAxMTA1MzE5ODYxNzg4Wj

Figure 6: Banks' Level of Participation at Different Wallets: MCX



Source: Celent Digital Payments Panel, n=40

Just like the family described at the beginning of this report, banks, retailers, and Fintech are in an ecosystem more symbiotic than many are prepared to admit. Clearly, not all of today's banks will survive, but the survivors will be those that reimagine relationships with their customers and partners.

Key Research Question

3

Do banks have a future in payments?

Banking will change, but *banks* will not disappear. The survivors will reimagine relationships with their customers and partners.

Was this report useful to you? Please send any comments, questions, or suggestions for upcoming research topics to info@celent.com.

LEVERAGING CELENT'S EXPERTISE

If you found this report valuable, you might consider engaging with Celent for custom analysis and research. Our collective experience and the knowledge we gained while working on this report can help you streamline the creation, refinement, or execution of your strategies.

Support for Financial Institutions

Typical projects we support related to cards and payments include:

Vendor short listing and selection. We perform discovery specific to you and your business to better understand your unique needs. We then create and administer a custom RFI to selected vendors to assist you in making rapid and accurate vendor choices.

Business practice evaluations. We spend time evaluating your business processes, particularly in issuing, acquiring, and product development. Based on our knowledge of the market, we identify potential process or technology constraints and provide clear insights that will help you implement industry best practices.

IT and business strategy creation. We collect perspectives from your executive team, your front line business and IT staff, and your customers. We then analyze your current position, institutional capabilities, and technology against your goals. If necessary, we help you reformulate your technology and business plans to address short-term and long-term needs.

Support for Vendors

We provide services that help you refine your product and service offerings. Examples include:

Product and service strategy evaluation. We help you assess your market position in terms of functionality, technology, and services. Our strategy workshops will help you target the right customers and map your offerings to their needs.

Market messaging and collateral review. Based on our extensive experience with your potential clients, we assess your marketing and sales materials—including your website and any collateral.

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