e-QR Scheme Rules v0.1

Rules for certified operators of the e-QR payment standard

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Version history

Version	Date	Change
v0.1	2026-11-17	First version

These rules bind every certified operator through its certification agreement. Where these rules and the e-QR Specification disagree, the Specification governs the payload and these rules govern everything else.

1. What the scheme is

1.1. e-QR is an open way for a payer to pay a merchant by ordinary SEPA credit transfer, through any payment service provider. The merchant shows a code signed by its operator. The payer's own payment app reads the code and prefills the transfer; where the app does not read e-QR codes yet, the phone camera opens the scheme's payer page, which shows the verified receiver and hands the payment to the payer's payment service provider. No funds pass through the scheme or through any operator.

1.2. The scheme consists of: the e-QR Technical Specification v0.1 with its Signed-URL Carrier Profile v0.1 (together the **Specification**: payload, signature, resolver and payer-page behaviour); these Scheme Rules; the Certification Criteria; the signed Operator Directory of certified operators, their registry addresses and public signing keys; the scheme's payer host **pay.eqrstandard.com** and the domain eqr.ee; and the names "e-QR" and "eQR" and the e-QR logo (the **Mark**).

1.3. e-QR Payment Standard MTÜ (the **Association**) owns items 1.2 and nothing else. It does not onboard merchants, hold merchant data, operate a resolver or touch payments. It runs the payer host (s. 6.5).

1.4. **Merchants.** A merchant is a legal person (including a non-profit association) or a sole proprietor (FIE) entered in the Estonian business register or the register of taxable persons. Private persons are not eligible under version 0.1.

1.5. **Words.** The Specification calls the Association the Governance Authority and a certified operator an accredited Operator. They mean the same.

2. Operators

2.1. An **operator** is a legal person certified by the Association under the Certification Criteria. Only a certified operator may issue e-QR codes, run a merchant registry, or use the Mark.

2.2. An operator builds and runs its own registry, resolver and merchant service, under a registry address of its own listed in the Operator Directory. It never uses a host of its own in a code (Carrier Profile s. 3). The operator is the data controller for its merchants and for the data its registry receives.

2.3. **Use of the Mark.** An operator may describe itself as **"certified e-QR operator"** and show its certificate number. It may use the e-QR name and logo, in the files and colours the Association publishes and without changes, only (a) in an operator badge: the logo with the words "certified e-QR operator no. NNN", linked to the Association's register; (b) on the e-QR codes it issues, on the printed materials that carry them, and on pictures of those; and (c) in text, to say that its codes follow the e-QR standard. The Mark may not form part of or stand next to an operator's own logo, may not form part of its company, product or domain names, and may not be used in a way that suggests the Association runs or guarantees the operator's service. An operator uses the Mark only while its certification is in force.

2.4. Operators contract with merchants in their own name and on their own published terms. Those terms must comply with section 4.

2.5. **One operator per country.** During the Association's bootstrap phase (Governance Note s. 2) the Association certifies one operator for each country. An application is accepted only for a country that has no certified operator. The Association reviews this limit when the bootstrap phase ends.

3. Operator and merchant identifiers, portability

3.1. On certification the Association issues the operator an **operator ID (OPID)** of three characters A–Z, 0–9 (Specification s. 6.1). The OPID, the operator's hosts and its signing keys are published in the signed Operator Directory (Annex A). An OPID is never reissued to another operator.

3.2. Every registered merchant account receives a **merchant ID (MID)** from its operator in the form `CC-OPID-NNNNNNNN`: the merchant's country, the issuing operator's OPID and eight digits chosen at random, for example `EE-PCD-48213907` (Carrier Profile s. 2). A MID is bound to one verified name and one IBAN. It is never reissued, and a change of IBAN means a new MID and a new code.

3.3. **Portability.** A merchant may move to another certified operator at any time and free of charge. On the merchant's written request the old operator hands the verified record (MID, verified legal name, registry code, IBAN, verification date and method) to the new operator within 10 working days. The new operator may rely on a verification less than 12 months old, and issues a new MID and code under its own OPID. The old operator puts the old MID on its revocation list when the merchant confirms the new code is in use, and no later than 30 days after the handover.

3.4. An operator whose certification ends must, within 30 days, offer each merchant transfer to another certified operator and keep its resolver, key and revocation endpoints answering for a further 90 days. If no other certified operator exists, the Association designates the successor arrangement.

4. What operators may and may not charge merchants

4.1. **Ceiling.** The total an operator charges a merchant per calendar year for e-QR registration, codes and registry service may not exceed the ceiling for the merchant's tier. The ceilings are stated without VAT; VAT is added where it applies. An operator may charge less or nothing.

Tier	Merchant's annual turnover	Ceiling per year, without VAT
Micro	up to €40,000	€36
Small	over €40,000, up to €200,000	€72
Medium	over €200,000, up to €1,000,000	€180
Large	over €1,000,000	€480

The Association reviews the tiers and ceilings once a year and publishes any change at least 90 days before it applies.

4.2. **Never.** No fee charged to a merchant may depend on the number or value of payments or scans. No fee may be charged to payers. No fee may be charged for transferring a merchant to another operator.

4.3. An operator may charge for optional physical goods (printed signage) at a separately stated price.

4.4. **Operator fees.** Operators pay the Association the fees in Annex B. The Association notifies operators of a change to Annex B at least 90 days before it applies.

4.5. **How the tier is set.** Turnover is the merchant's total sales revenue in its last completed financial year, from all sources; it is never the payments received through e-QR. The merchant declares its tier and the operator may check it against public data (annual report, tax board figures, VAT register). A merchant with no completed financial year is Micro. The tier is fixed for each paid year and reviewed at renewal: a change applies from the next renewal, and nothing is charged or refunded for a year already paid.

5. Operator duties

5.1. Verify each merchant to at least the baseline in the Certification Criteria before issuing a code, and keep the record of how.

5.2. Sign every code and every resolver response with an ES256 key published in the Operator Directory. A new key is published in the Directory before anything is signed with it, and a retired key stays listed while codes signed with it are in use.

5.3. Keep the resolver and registry available (target in the Criteria), and answer incident reports within two working days.

5.4. Revoke a code, by putting its MID on the operator's revocation list and stopping the resolver entry, within one working day of learning that the merchant's account has changed, the merchant has ceased, or the code is misused.

5.5. Never sell, rent or share merchant or payer data beyond what the service needs; never track payers across scans; keep scan logs no longer than 90 days except for fraud evidence.

5.6. Report to the Association, each calendar quarter, the number of active merchants (merchants with a valid code) and the number of revocations. Nothing else.

5.7. Publish merchant terms, a privacy notice and the current price on its own site, and show "certified e-QR operator no. NNN" with a link to the Association's register.

6. The Association's duties

6.1. Keep the Specification, these Rules and the Criteria public and versioned.

6.2. Publish the signed Operator Directory (Annex A), keep it valid at all times, so that a bank or app can verify an e-QR signature.

6.3. Decide certification applications within 30 days of a complete application, in writing, with reasons.

6.4. State the conflict in the text of any certification decision concerning an applicant controlled by a board member (Governance Note s. 3).

6.5. Run the scheme's payer host, itself or through a provider under a written agreement, as Carrier Profile s. 9 requires: the same for every operator in the Directory, storing no payer data, and sending scan counts only to the operator named in the code. Keep eqr.ee only as a redirect to eqrstandard.com.

7. Breach and revocation

7.1. On a breach, the Association notifies the operator in writing with a cure period of 30 days (one working day for 5.4).

7.2. If uncured, the Association may suspend or revoke certification and publishes the status in the register. A revoked operator's Directory entry is kept for the 90-day wind-down in 3.4 and then removed.

7.3. Disputes: Estonian law; the parties try a written settlement for 30 days before Tartu County Court.

8. Changes to these rules

8.1. The board may amend these Rules. Amendments that increase operator duties or change section 4 take effect 90 days after publication; others 30 days. Operators are notified by e-mail to their registered contact.

Annex A — the Operator Directory

The Association publishes the signed Operator Directory defined in Carrier Profile s. 6 at

`https://eqrstandard.com/.well-known/eqr/operators.json`

Example (key and signature values shortened):

```
{
  "spec_version": "e-qr-directory-0.3",
  "payer_hosts": ["pay.eqrstandard.com"],
  "operators": [
    {
      "opid": "PCD",
      "name": "Paycode OÜ",
      "country": "EE",
      "status": "active",
      "registry": "https://registry.paycode.ee",
      "signing_keys": [
        {"kid": "…", "kty": "EC", "crv": "P-256", "x": "…", "y": "…"}
      ]
    }
  ],
  "valid_until": "…",
  "sig": {"jws": "…"}
}
```

The Directory is signed with the Association's directory key, which no operator holds. The public half is published on the Specification page for verifiers to pin. The Association re-signs the Directory on every change (an operator added, suspended or removed, a key added or retired, a registry address or payer host changed) and at least every 12 months; `valid_until` is set 13 months ahead. A verifier accepts a code only if the Directory signature verifies, the Directory has

not passed `valid_until`, the code's host is in `payer_hosts`, the OPID is listed with status `active`, and the signing `kid` is among that operator's `signing_keys`.

The human-readable register at eqrstandard.com/operators shows, for each OPID: certificate number, legal name, registry code, date certified, status and a link to the certification decision.

Annex B — Operator fees

Fee	Amount	Payable
Certification fee	€3,000	Once, with the application
Yearly fee	€1,500	For each calendar year after the year of certification
Per-merchant fee	€1 per active merchant	For each calendar year, on the number of active merchants (s. 5.6) at 31 December

Amounts are stated without VAT; VAT is added where it applies.

Founding operator. The founding operator is the operator that, itself or through a company of the same group, financed and carried out the development of the Specification, these Rules and the Certification Criteria, made them available to the Association without payment, and built and operated the first merchant registry at its own cost before the first certification. In consideration of that contribution, the founding operator's certification fee, and its yearly and per-merchant fees for the period up to the end of the Association's bootstrap phase (Governance Note s. 2), are set off against the contribution and are not payable. From the calendar year following the end of the bootstrap phase the founding operator pays the yearly fee and the per-merchant fee as any other operator does.

The set-off concerns fees only. The founding operator is assessed against the same Certification Criteria, and is bound by the same Rules, as every other operator. The contribution and the set-off are recorded in the founding operator's certification agreement.