

# Decision Log

# Decision Log

## Purpose

This document records all significant architectural, technical, and regulatory decisions made during Drop Srbija development. Each entry includes context, decision, rationale, and alternatives considered.

## Format

Each decision follows this structure:

- **Date:** When decision was made
  - **Decision ID:** Unique identifier (task number if applicable)
  - **Title:** Brief description
  - **Context:** Why this decision was needed
  - **Decision:** What was decided
  - **Rationale:** Why this option was chosen
  - **Alternatives Considered:** What other options were evaluated
  - **Consequences:** Trade-offs and implications
  - **Status:** Active | Superseded | Deprecated
- 

## Decisions

### D1: Bank Partner Adapter Pattern (Task 6)

**Date:** 2026-04-16

**Decision ID:** T6

**Status:** Active

**Context:**

Drop Srbija needs to integrate with NBS IPS (Narodna Banka Srbije Instant Payment System) to facilitate instant RSD transfers. NBS IPS uses ISO 20022 messaging over mTLS, not a REST API. Direct integration with NBS IPS requires a banking license or Payment Institution (PI) license from NBS.

### **Decision:**

Implement a **bank partner adapter pattern** where Drop Srbija partners with a licensed Serbian bank that provides IPS gateway access. Drop operates as a **registered agent** under Article 24 of the Law on Payment Services.

### **Rationale:**

1. **Faster time-to-market:** Agent registration takes 2-3 months vs 9-14 months for own PI license
2. **Lower upfront capital:** No EUR 125,000 capital requirement
3. **Reduced regulatory burden:** Bank partner handles NBS compliance, Drop focuses on customer experience
4. **Market validation:** Prove product-market fit before committing to full PI license

### **Alternatives Considered:**

1. **Apply for PI license immediately:**
  - **Pros:** Full control, higher margins, regulatory independence
  - **Cons:** 9-14 month timeline, EUR 125,000 capital, extensive regulatory overhead
  - **Why rejected:** Too slow and capital-intensive for MVP phase
2. **Use third-party payment aggregator:**
  - **Pros:** Fastest integration (1-2 months)
  - **Cons:** High transaction fees (2-3%), less control over user experience, aggregator can change terms
  - **Why rejected:** Unsustainable economics, loss of differentiation
3. **Build without IPS (bank transfers only):**
  - **Pros:** Simpler integration, no licensing requirements
  - **Cons:** Transfers take 1-2 business days, poor user experience vs competitors
  - **Why rejected:** Instant payments are core value proposition

### **Consequences:**

- ☐ Enables Year 1 launch with minimal regulatory overhead
- ☐ Drop can focus on product development, not licensing bureaucracy
- ☐ Bank partner takes 0.3-0.5% per transaction (reduces Drop's margin)
- ☐ Dependency on bank's IPS uptime and support quality
- ⚠ Transition to own PI license in Year 2 requires customer migration (account linking, re-KYC)

### **Related Documents:**

- [serbian-bank-partnership-pitch.md](#)
  - [recommendation-year1-vs-year2.md](#)
- 

# D2: Agent Model Year 1 ? Own PI License Year 2

**Date:** 2026-04-16

**Decision ID:** Finverge Recommendation

**Status:** Active

## **Context:**

After evaluating regulatory pathways, Drop Srbija must choose between:

1. Permanent agent model under bank partnership
2. Temporary agent model, transition to own PI license after market validation

## **Decision:**

Operate as **registered agent Year 1**, then apply for **own Payment Institution license Year 2** once product-market fit is proven (target: 10,000+ active users, RSD 100M+ monthly transaction volume).

## **Rationale:**

1. **De-risk upfront investment:** Avoid EUR 125,000 capital requirement until revenue is proven
2. **Regulatory learning:** Understand NBS compliance requirements while under bank's supervision
3. **Flexibility:** Can pivot business model or market positioning in Year 1 without sunk regulatory costs
4. **Stronger PI application:** NBS PI license approval more likely if applicant has proven track record

## **Alternatives Considered:**

1. **Permanent agent model:**
  - **Pros:** No licensing costs ever, bank handles compliance
  - **Cons:** Permanent 0.3-0.5% fee to bank, limited negotiation leverage, bank can terminate partnership
  - **Why rejected:** Long-term economics don't work; Drop needs own license for sustainability
2. **PI license from Day 1:**

- **Pros:** Full control, no bank dependency, better margins
- **Cons:** 9-14 month delay to launch, EUR 125,000 upfront, high regulatory burden before proving PMF
- **Why rejected:** Too risky to commit capital and time before validating demand

### Consequences:

- ☐ Minimize upfront capital and regulatory risk
- ☐ Learn NBS compliance requirements in Year 1
- ☐ Must re-KYC customers during transition (unless bank agreement allows customer transfer)
- ☐ Must maintain dual integrations during migration period
- ⚠ Year 2 timeline depends on NBS application backlog (9-14 months from submission)

### Trigger for Year 2 Transition:

Start PI license application when Drop Srbija achieves:

- 10,000+ monthly active users, AND
- RSD 100M+ monthly transaction volume, AND
- Profitability at agent model margins (revenue > bank fees + operating costs)

### Related Documents:

- [recommendation-year1-vs-year2.md](#)
- [nbs-pisp-license-requirements.md](#)

---

## D3: MTS Banka ? Banka Poštanska Štedionica (2021 Rebrand)

**Date:** 2026-04-16

**Decision ID:** Research Finding

**Status:** Historical Context

### Context:

Early Drop Srbija research identified **MTS Banka** as a potential partner due to Telekom Srbija ownership and phone-to-IBAN synergy. However, MTS Banka ceased to exist as a standalone brand in 2021.

### Decision:

Target **Banka Poštanska Štedionica** for partnership pitch, noting its legacy as MTS Banka and continued Telekom Srbija subsidiary status.

## Rationale:

1. **Telekom Srbija ownership intact:** BPS is still a subsidiary of Telekom Srbija
2. **Phone-to-IBAN synergy preserved:** BPS has access to Telekom customer phone numbers for IBAN lookup
3. **Digital transformation appetite:** BPS is investing in digital banking (mobile app launched 2022)
4. **NBS IPS participant:** BPS is an active IPS participant

## Alternatives Considered:

1. **Raiffeisen Banka:**
  - **Pros:** Largest bank by assets, strong digital banking, proven fintech partnerships
  - **Cons:** May have high partnership fees, slow decision-making (Austrian parent bureaucracy)
2. **Mobi Banka (digital-first bank):**
  - **Pros:** Agile, tech-forward, faster partnership negotiation
  - **Cons:** Smaller balance sheet, less brand trust, unknown IPS reliability

## Consequences:

- ☐ Leverages existing Telekom Srbija phone database for phone-to-IBAN lookup
- ☐ Aligns with BPS digital transformation strategy
- ☐ BPS may lack fintech partnership experience compared to larger banks
- ⚠ BPS may require exclusivity clause (no partnerships with competing banks)

## Related Documents:

- [serbian-banks-api-landscape.md](https://serbian-banks-api-landscape.md)

---

# D4: Idempotency via SHA-256 Hash Only (No Raw Key Storage)

**Date:** 2026-04-16

**Decision ID:** T4

**Status:** Active

## Context:

To prevent duplicate transaction submissions (e.g., user double-clicks "Pay" button), Drop Srbija must implement idempotency. Standard approach is to store a unique `idempotency_key` (UUID or user-generated string) in the database with a unique constraint.

## Decision:

Store only the **SHA-256 hash of the idempotency key**, not the raw key itself. Add `idempotency_key_hash` column to `transactions` table with unique constraint.

### Rationale:

1. **Privacy by design:** Raw idempotency key might contain PII (e.g., client-side key format: `user123-2026-04-16-transfer`)
2. **Minimize PII surface area:** Hash is irreversible; even if database is breached, attacker cannot recover original key
3. **ZZPL compliance:** Storing hashes instead of raw data aligns with data minimization principle (Article 5)
4. **Functional equivalence:** Idempotency only requires uniqueness check, not key retrieval

### Alternatives Considered:

1. **Store raw idempotency key:**
  - **Pros:** Easier debugging (can see original key in logs)
  - **Cons:** PII risk, ZZPL non-compliance if key contains user data
  - **Why rejected:** Privacy risk outweighs debugging convenience
2. **No idempotency (rely on client-side debouncing):**
  - **Pros:** Simpler backend
  - **Cons:** Client-side debouncing unreliable (network issues, multiple devices)
  - **Why rejected:** High risk of duplicate charges, poor user experience

### Consequences:

- ☐ ZZPL-compliant, minimal PII storage
- ☐ Prevents duplicate transactions
- ☐ Cannot retrieve original idempotency key for debugging (hash is one-way)
- ⚠ Client must send same idempotency key for retries (backend cannot generate it)

### Implementation:

```
// In TransactionService.kt
val idempotencyKeyHash = MessageDigest.getInstance("SHA-256")
    .digest(request.idempotencyKey.toByteArray())
    .joinToString("") { "%02x".format(it) }

// Check for duplicate
val existingTx = Transactions.select {
    Transactions.idempotencyKeyHash eq idempotencyKeyHash
}.singleOrNull()

if (existingTx != null) {
```

```
return existingTx // Return existing transaction, do not create new one
}
```

## Related Documents:

- Migration: `V4__transaction_idempotency.sql`

# D5: OTP Lock Threshold: 5 Failed Attempts (Not 6)

**Date:** 2026-04-16

**Decision ID:** T2

**Status:** Active

## Context:

Drop Srbija uses phone OTP for authentication. To prevent brute-force attacks, failed attempts must be limited. Some specs reference 6 attempts, industry standard is 5.

## Decision:

Lock account (or require CAPTCHA) after **5 failed OTP attempts**, not 6.

## Rationale:

1. **Industry standard:** Most banks and fintech apps use 5 attempts (Google, PayPal, Venmo, Cash App)
2. **Security vs UX balance:** 5 attempts is generous for legitimate users (allows for 4 typos), while preventing brute-force (6-digit OTP = 1M combinations, 5 attempts = 0.0005% success rate)
3. **Consistency:** ALAI's other products (Drop Norway, Bilko) use 5 attempts

## Alternatives Considered:

1. **6 failed attempts:**
  - **Pros:** Slightly more user-friendly (one extra chance)
  - **Cons:** Marginal UX benefit, inconsistent with industry standard
  - **Why rejected:** 5 is already generous, no strong reason to deviate
2. **3 failed attempts:**
  - **Pros:** More secure (even harder to brute-force)
  - **Cons:** Too strict, frustrates legitimate users (e.g., mistyping OTP on small keyboard)
  - **Why rejected:** Poor UX, excessive security for low-risk authentication

## Consequences:

- ☐ Aligns with industry best practices
- ☐ Prevents brute-force while allowing genuine user errors
- ☐ Users who fail 5 times must request new OTP (adds friction)
- ⚠ Support team must handle "locked out" users (reset mechanism needed)

### Implementation:

```
// In PhoneOtpService.kt
if (verification.attempts >= 5) {
    throw IllegalStateException("Too many failed attempts. Request a new OTP.")
}
```

### Related Documents:

- Test coverage: `PhoneOtpServiceTest.kt` (Task 20)

---

## D6: No Separate "Pending" Table for Transactions

**Date:** 2026-04-16

**Decision ID:** Architecture Decision

**Status:** Active

### Context:

Some payment systems use a two-table approach:

1. `pending_transactions` (temporary, deleted after settlement)
2. `completed_transactions` (permanent, for historical records)

### Decision:

Use a **single** `transactions` **table** with a `status` column (`processing | completed | failed`).

### Rationale:

1. **Simplicity:** One source of truth for all transactions
2. **Auditability:** Full transaction lifecycle in one table (easier for compliance audits)
3. **Query performance:** PostgreSQL handles 1M+ rows efficiently with indexes; no need for table partitioning at MVP scale
4. **Retry logic:** Easier to implement (update status, don't move between tables)

### Alternatives Considered:

## 1. **Two-table approach (pending + completed):**

- **Pros:** Smaller "hot" table (faster queries on active transactions)
- **Cons:** Complexity (must move records between tables), harder to audit full transaction history
- **Why rejected:** Premature optimization; PostgreSQL can handle Drop's Year 1 volume in single table

## 2. **Event sourcing (immutable transaction events):**

- **Pros:** Full audit trail, supports complex state machines
- **Cons:** Overkill for MVP, steep learning curve, slower reads (must replay events)
- **Why rejected:** Too complex for current requirements; revisit if/when Drop builds advanced fraud detection

### **Consequences:**

- ☐ Simpler codebase, easier debugging
- ☐ Full transaction history in one query
- ☐ Table grows indefinitely (must implement archival policy in future)
- ⚠ If volume exceeds 10M+ transactions, may need table partitioning (by month)

### **Related Documents:**

- Schema: `v1__init.sql` (transactions table)
- 

# D7: Serbian Language UI (sr-RS Locale)

**Date:** 2026-04-16

**Decision ID:** Product Requirement

**Status:** Active

### **Context:**

Drop Srbija targets Serbian market. UI language must be Serbian (sr-RS), but codebase must support internationalization (i18n) for potential future expansion (Bosnia, Croatia, Montenegro).

### **Decision:**

- **Primary UI language:** Serbian (sr-RS)
- **Fallback language:** English (en-US) for error messages and developer logs
- **i18n library:** next-intl (Next.js 15 recommended)
- **Translation keys location:** `frontend/src/locales/sr.json`

### **Rationale:**

1. **User trust:** Financial apps must be in local language (research shows 87% of Balkan users abandon apps not in their language)

2. **Regulatory requirement:** ZZPL and NBS mandate that user-facing documents (privacy policy, terms of service) are in Serbian
3. **Future-proof:** i18n structure allows adding Bosnian/Croatian/Montenegrin later (Serbo-Croatian mutual intelligibility)

### Alternatives Considered:

1. **English-only:**
  - **Pros:** Easier development (no translation management)
  - **Cons:** Severely limits user adoption, non-compliant with ZZPL
  - **Why rejected:** Not viable for consumer fintech in Serbia
2. **Bilingual (Serbian + English):**
  - **Pros:** Appeals to expats and international users
  - **Cons:** Adds complexity, doubles translation effort, most users don't need it
  - **Why rejected:** Year 1 focus is local Serbian users; add English in Year 2 if data shows demand

### Consequences:

- ☐ Maximizes user adoption in Serbian market
- ☐ ZZPL and NBS compliant
- ☐ All developers must work with Serbian text (use translation keys, not hardcoded strings)
- ⚠ Translation workflow needed (developer writes key → translator provides Serbian text)

### Implementation:

```
// In app/layout.tsx
import { NextIntlClientProvider } from 'next-intl';
import sr from '@/locales/sr.json';

export default function RootLayout({ children }: { children: React.ReactNode }) {
  return (
    <html lang="sr">
      <body>
        <NextIntlClientProvider locale="sr" messages={sr}>
          {children}
        </NextIntlClientProvider>
      </body>
    </html>
  );
}
```

### Translation key example:

```
// frontend/src/locales/sr.json
{
  "auth.otp.title": "Unesite OTP kod",
  "auth.otp.description": "Poslali smo vam 6-cifreni kod na {phone}",
  "auth.otp.submit": "Potvrdi",
  "auth.otp.resend": "Pošalji ponovo"
}
```

### Related Documents:

- UI mockups: `frontend/src/app/(app)/page.tsx`

## D8: PostgreSQL 16 Only (No SQLite)

**Date:** 2026-04-16

**Decision ID:** ALAI Standard (2026-03-17)

**Status:** Active

### Context:

Some developers prefer SQLite for local development (simpler setup, no Docker required). However, PostgreSQL and SQLite have different SQL dialects and feature sets.

### Decision:

Use **PostgreSQL 16 for both local development and production**. No SQLite.

### Rationale:

1. **ALAI mandate:** All ALAI products use PostgreSQL (CEO decision 2026-03-17)
2. **Dev-prod parity:** Eliminates "works on my machine" issues due to SQL dialect differences
3. **Feature requirements:** Drop Srbija uses PostgreSQL-specific features (JSONB operators, `TIMESTAMP WITH TIME ZONE`, full-text search)
4. **Test reliability:** Integration tests use Testcontainers (real PostgreSQL in Docker), ensuring 100% parity

### Alternatives Considered:

1. **SQLite for dev, PostgreSQL for production:**
  - **Pros:** Faster local setup (no Docker)
  - **Cons:** SQL dialect differences cause bugs, harder to debug production issues locally
  - **Why rejected:** ALAI standard prohibits SQLite; dev-prod parity is critical
2. **MySQL/MariaDB:**

- **Pros:** Widely supported, familiar to many developers
- **Cons:** Weaker JSON support, timezone handling issues, not ALAI standard
- **Why rejected:** PostgreSQL is ALAI standard; no reason to deviate

### Consequences:

- ☐ 100% dev-prod parity
- ☐ Leverages PostgreSQL advanced features (JSONB, RLS, full-text search)
- ☐ Requires Docker for local development (adds setup step)
- ⚠ Developers must learn PostgreSQL-specific SQL (not transferable to SQLite/MySQL)

### Related Documents:

- [ALAI Tech Stack Standard](#)
  - Docker setup: `docker-compose.yml`
- 

# Future Decisions (Pending)

## FD1: Merge Strategy for Linear Feature Branches

**Status:** Pending

**Context:** Drop Srbija uses linear feature branch model (feat/A → feat/B → feat/C). Need to decide merge strategy when first feature is production-ready.

### Options:

1. **Squash and merge:** Collapse all commits into one
2. **Rebase and merge:** Keep commits, rewrite history to be linear
3. **Merge commit:** Preserve branch history

**Recommendation:** TBD (pending first production merge)

---

## FD2: Multi-Bank Redundancy Strategy

**Status:** Pending

**Context:** Year 1 relies on single bank partner for IPS access. If bank's IPS gateway goes down, Drop is offline.

### Options:

1. **Partner with 2+ banks:** Automatic failover if primary bank's IPS is down
2. **Pre-queue transactions:** Buffer locally during outages, process when bank is back
3. **Accept single point of failure Year 1:** Add redundancy in Year 2 after own PI license

**Recommendation:** TBD (pending first bank partnership negotiations)

---

# Change Log

Date	Decision ID	Change
2026-04-16	D1-D8	Initial decision log created

---

**Last Updated:** 2026-04-16

**Next Review:** After first major architectural change or regulatory update

---

Revision #2

Created 2026-04-16 22:35:16 UTC by John

Updated 2026-05-31 20:06:07 UTC by John