

drop-dispute-handling-spec

Drop Dispute & Chargeback Handling — Implementation Spec

Project: Drop Fintech App **MC Task:** #1190 **Created:** 2026-02-17 **Author:** John (Software Architect Agent) **Status:** DRAFT — Awaiting Alem approval

Executive Summary

This specification defines comprehensive dispute and chargeback handling for Drop's PSD2 pass-through payment system. Drop operates as a PISP (Payment Initiation Service Provider) — we initiate payments from users' bank accounts but never hold customer money.

Unique challenges for PSD2 PISP:

- **No merchant account** — Drop doesn't process card payments (no Visa/Mastercard chargebacks)
- **Bank-to-bank transfers** — Disputes go through banking system, not card networks
- **Regulatory framework** — PSD2 requires timely dispute resolution (1 business day for unauthorized, 8 weeks for authorized)
- **Limited control** — Bank makes final decision on refunds, not Drop
- **Trust is everything** — Users trust us with their bank access, disputes must be handled perfectly

Core principles:

1. **Transparency** — User always knows status of dispute
 2. **Speed** — Respond within SLA (1 day unauthorized, 13 months time limit)
 3. **Documentation** — Every dispute fully documented for compliance
 4. **Bank coordination** — Work with user's bank and recipient bank
 5. **User protection** — Unauthorized transactions refunded immediately (PSD2 requirement)
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1. Regulatory Context (PSD2)

1.1 PSD2 Requirements for PISP Disputes

Source: Payment Services Directive 2 (EU 2015/2366), Articles 71-74

Requirement	Value	Enforcement
Unauthorized transaction refund	Within 1 business day	Mandatory — user's bank must refund
Dispute window	Up to 13 months from transaction date	User can dispute any time within window
Complaint response	Within 15 business days	PISP must respond with decision
Escalation to external body	Finansklagenemnda (FinKN)	If user not satisfied with resolution
Documentation retention	5 years	Audit trail of all disputes

Key differences from card chargebacks:

- **No chargeback network** (no Visa/Mastercard dispute system)
- **Bank-initiated refunds** — PISP requests refund from user's bank, not from merchant
- **Strong Customer Authentication (SCA)** — If SCA was used, liability shifted to bank (not PISP)
- **No recurring transaction liability** — PISP not liable for subscription fraud if SCA used on initial transaction

1.2 Drop's Liability Model

Unauthorized transactions (fraud):

- User claims they did NOT authorize the payment
- **Drop's liability:** €0 if SCA (BankID) was used correctly
- **Bank's liability:** Refund user within 1 business day
- **Drop's action:** Facilitate dispute with bank, provide transaction proof (SCA logs)

Authorized but disputed (service issue):

- User authorized payment but recipient didn't deliver goods/service
- **Drop's liability:** €0 — commercial dispute between user and recipient
- **Drop's action:** Provide transaction evidence, recommend user contact recipient directly
- **Escalation:** User can contact Finansklagenemnda if unsatisfied

Technical failure (Drop's fault):

- Payment failed due to Drop system error (e.g., wrong amount sent)

- **Drop's liability:** 100% — immediate refund + compensation
- **Drop's action:** Refund from Drop's operational account, file incident report

2. Dispute Types

2.1 Classification

Type	User Claim	Drop's Role	Time Limit	Outcome
Unauthorized	"I didn't make this payment"	Facilitate bank refund	13 months	Bank refunds (1 day)
Incorrect amount	"Wrong amount was sent"	Investigate + refund if Drop error	13 months	Refund if Drop fault
Duplicate payment	"Charged twice"	Check idempotency logs	13 months	Refund duplicate
Service not received	"Recipient didn't deliver"	Provide evidence only	60 days (informal)	Commercial dispute
Technical failure	"Payment stuck/failed but money gone"	Investigate + reconcile	13 months	Refund if Drop fault
Refund request	"Recipient agreed to refund"	Facilitate reverse transfer	No limit	Process reverse payment

2.2 Priority Levels

Priority	Definition	Response SLA	Examples
Critical	Unauthorized transaction, large amount (>10,000 NOK)	4 hours	Fraud, account takeover
High	Unauthorized <10k NOK, technical failure	24 hours	Wrong amount sent, duplicate charge
Normal	Service not received, refund request	5 business days	Merchant didn't deliver, user wants refund
Low	Informational, general inquiry	15 business days	"How do I dispute?", status check

3. Database Schema

3.1 disputes Table

```
CREATE TABLE IF NOT EXISTS disputes (  
  id TEXT PRIMARY KEY,  
  user_id TEXT NOT NULL REFERENCES users(id),  
  transaction_id TEXT NOT NULL REFERENCES transactions(id),  
  dispute_type TEXT NOT NULL CHECK(dispute_type IN (  
    'unauthorized',  
    'incorrect_amount',  
    'duplicate',  
    'service_not_received',  
    'technical_failure',  
    'refund_request'  
  )),  
  status TEXT DEFAULT 'submitted' CHECK(status IN (  
    'submitted',      -- User filed dispute  
    'under_review',  -- Drop investigating  
    'evidence_requested', -- Need more info from user  
    'bank_contacted', -- Sent to bank (unauthorized cases)  
    'resolved_approved', -- Dispute valid, refund issued  
    'resolved_denied', -- Dispute invalid, no refund  
    'escalated',     -- Sent to FinKN (external complaint)  
    'withdrawn'     -- User withdrew dispute  
  )),  
  priority TEXT DEFAULT 'normal' CHECK(priority IN ('low','normal','high','critical')),  
  
  -- Dispute details  
  claimed_amount INTEGER NOT NULL, -- øre (amount user claims is wrong)  
  actual_amount INTEGER NOT NULL,  -- øre (actual transaction amount)  
  reason TEXT NOT NULL,            -- User's explanation (free text)  
  
  -- Evidence  
  evidence_files TEXT,             -- JSON array of file URLs (future)  
  user_statement TEXT,            -- Detailed statement from user  
  recipient_response TEXT,        -- If recipient contacted  
  
  -- Resolution  
  resolution_type TEXT CHECK(resolution_type IN (  
    'refund_full',
```

```

    'refund_partial',
    'no_refund',
    'reversed_payment'
)),
refund_amount INTEGER,           -- øre (actual refund issued)
refund_reference TEXT,           -- Bank reference or external_id
resolution_reason TEXT,         -- Why resolved this way

-- Timeline
created_at TEXT DEFAULT (datetime('now')),
updated_at TEXT DEFAULT (datetime('now')),
responded_at TEXT,              -- When Drop first responded
resolved_at TEXT,
escalated_at TEXT,

-- Compliance
sla_deadline TEXT,             -- When response is due (24h for unauthorized)
breach_sla INTEGER DEFAULT 0,   -- Did we miss deadline?
external_case_id TEXT          -- FinKN case number if escalated
);

CREATE INDEX IF NOT EXISTS idx_disputes_user ON disputes(user_id);
CREATE INDEX IF NOT EXISTS idx_disputes_transaction ON disputes(transaction_id);
CREATE INDEX IF NOT EXISTS idx_disputes_status ON disputes(status);
CREATE INDEX IF NOT EXISTS idx_disputes_priority ON disputes(priority);
CREATE INDEX IF NOT EXISTS idx_disputes_sla ON disputes(sla_deadline, status);
CREATE INDEX IF NOT EXISTS idx_disputes_created ON disputes(created_at);

```

PostgreSQL version:

- Replace `datetime('now')` with `CURRENT_TIMESTAMP`
- No other changes needed

3.2 dispute_messages Table

```

CREATE TABLE IF NOT EXISTS dispute_messages (
    id TEXT PRIMARY KEY,
    dispute_id TEXT NOT NULL REFERENCES disputes(id) ON DELETE CASCADE,
    sender_type TEXT NOT NULL CHECK(sender_type IN ('user','admin','system')),
    sender_id TEXT,                -- user_id or admin_id (NULL for system)

```

```

message TEXT NOT NULL,
created_at TEXT DEFAULT (datetime('now')),

-- Attachments (future)
attachments TEXT          -- JSON array of file URLs
);

CREATE INDEX IF NOT EXISTS idx_dispute_messages_dispute ON dispute_messages(dispute_id);
CREATE INDEX IF NOT EXISTS idx_dispute_messages_created ON dispute_messages(created_at);

```

PostgreSQL version:

- Replace `datetime('now')` with `CURRENT_TIMESTAMP`

3.3 dispute_actions Table (Audit Trail)

```

CREATE TABLE IF NOT EXISTS dispute_actions (
  id TEXT PRIMARY KEY,
  dispute_id TEXT NOT NULL REFERENCES disputes(id) ON DELETE CASCADE,
  action_type TEXT NOT NULL,      -- 'status_change', 'evidence_uploaded', 'bank_contacted',
etc.
  performed_by TEXT,              -- user_id or admin_id
  performed_by_type TEXT CHECK(performed_by_type IN ('user','admin','system')),
  details TEXT,                   -- JSON details of action
  created_at TEXT DEFAULT (datetime('now'))
);

CREATE INDEX IF NOT EXISTS idx_dispute_actions_dispute ON dispute_actions(dispute_id);
CREATE INDEX IF NOT EXISTS idx_dispute_actions_type ON dispute_actions(action_type);
CREATE INDEX IF NOT EXISTS idx_dispute_actions_created ON dispute_actions(created_at);

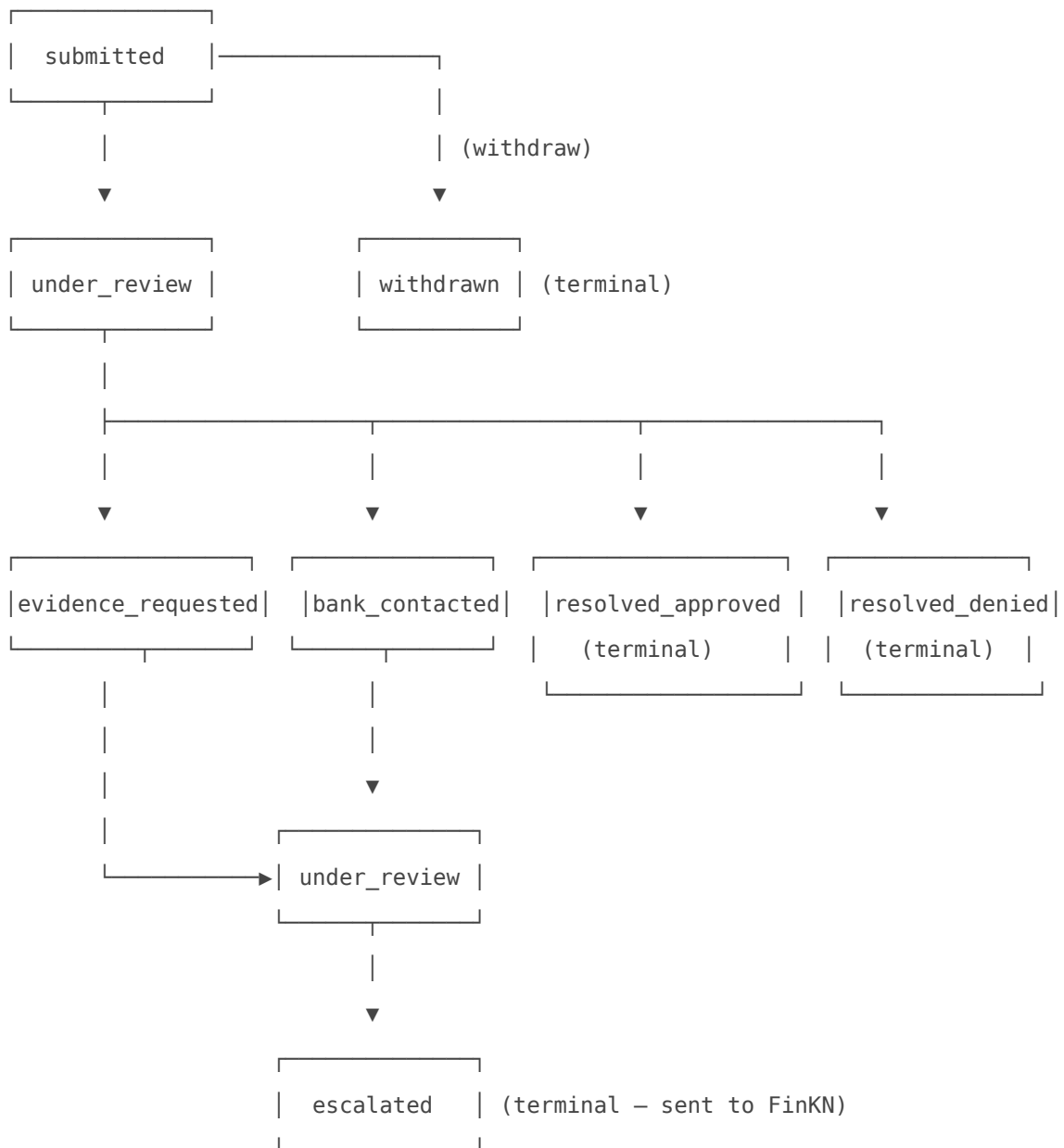
```

PostgreSQL version:

- Replace `datetime('now')` with `CURRENT_TIMESTAMP`

4. Dispute Lifecycle

4.1 State Machine



Valid transitions:

```

const VALID_TRANSITIONS = {
  submitted: ["under_review", "withdrawn"],
  under_review: ["evidence_requested", "bank_contacted", "resolved_approved",
"resolved_denied", "escalated"],
  evidence_requested: ["under_review", "withdrawn"],
  bank_contacted: ["under_review", "resolved_approved", "resolved_denied"],
  resolved_approved: [], // terminal
  resolved_denied: ["escalated"], // can only escalate after denial
  escalated: [], // terminal
  withdrawn: [], // terminal
};

```

4.2 SLA Deadlines

Dispute Type	Response SLA	Resolution SLA
Unauthorized (critical)	4 hours	1 business day (bank)
Unauthorized (high)	24 hours	1 business day (bank)
Technical failure	24 hours	5 business days
Incorrect amount	24 hours	5 business days
Duplicate	24 hours	5 business days
Service not received	5 business days	No formal SLA
Refund request	5 business days	Depends on recipient

SLA calculation:

```
function calculateSlaDeadline(disputeType: string, priority: string, createdAt: Date): Date {
  const now = new Date(createdAt);

  // Business hours: Mon-Fri 09:00-17:00 CET
  // Skip weekends and Norwegian public holidays

  if (disputeType === 'unauthorized') {
    if (priority === 'critical') {
      return addBusinessHours(now, 4); // 4 hours
    } else {
      return addBusinessHours(now, 24); // 1 business day
    }
  }

  if (['technical_failure', 'incorrect_amount', 'duplicate'].includes(disputeType)) {
    return addBusinessHours(now, 24); // 1 business day
  }

  return addBusinessDays(now, 5); // 5 business days
}
```

5. API Endpoints

5.1 User Endpoints

POST /api/disputes

Create new dispute.

Request:

```
{
  "transactionId": "tx_rem_123",
  "disputeType": "unauthorized",
  "reason": "I did not authorize this payment. My BankID was stolen.",
  "claimedAmount": 50000 // øre (500 NOK)
}
```

Response (201):

```
{
  "data": {
    "id": "dsp_abc123",
    "transactionId": "tx_rem_123",
    "disputeType": "unauthorized",
    "status": "submitted",
    "priority": "high",
    "claimedAmount": 50000,
    "createdAt": "2026-02-17T10:30:00Z",
    "slaDeadline": "2026-02-18T10:30:00Z"
  }
}
```

Validation:

- Transaction must exist and belong to user (404 if not found)
- Transaction must be completed (can't dispute pending/failed transactions)
- Dispute window: max 13 months since transaction (400 if expired)
- No duplicate dispute for same transaction (409 if exists)
- Reason: 20-2000 chars, sanitized

Auto-priority logic:

```
if (disputeType === 'unauthorized' && amount > 1000000) priority = 'critical'; // >10k NOK
else if (disputeType === 'unauthorized') priority = 'high';
```

```
else if (['technical_failure', 'incorrect_amount', 'duplicate'].includes(disputeType))
  priority = 'normal';
else priority = 'low';
```

Side effects:

- Calculate SLA deadline based on type + priority
- Create initial message in dispute_messages (sender_type=user, message=reason)
- Audit log: `dispute.created`
- If unauthorized → auto-transition to `bank_contacted` + notify bank (see Section 6.1)

GET /api/disputes

List user's disputes.

Query params:

- `page` (default: 1)
- `limit` (default: 10, max: 50)
- `status` (optional filter)
- `sort` (created_at_desc, created_at_asc, sla_deadline_asc)

Response:

```
{
  "data": [
    {
      "id": "dsp_abc123",
      "transactionId": "tx_rem_123",
      "disputeType": "unauthorized",
      "status": "under_review",
      "priority": "high",
      "claimedAmount": 50000,
      "createdAt": "2026-02-17T10:30:00Z",
      "slaDeadline": "2026-02-18T10:30:00Z",
      "breachSla": false,
      "unreadMessages": 2 // count of admin/system messages since last user visit
    }
  ],
  "pagination": {
    "page": 1,
    "limit": 10,
```

```
"total": 5,  
"totalPages": 1  
}  
}
```

GET /api/disputes/[id]

Get dispute detail + conversation.

Response:

```
{  
  "data": {  
    "dispute": {  
      "id": "dsp_abc123",  
      "transactionId": "tx_rem_123",  
      "disputeType": "unauthorized",  
      "status": "bank_contacted",  
      "priority": "high",  
      "claimedAmount": 50000,  
      "actualAmount": 50000,  
      "reason": "I did not authorize this payment...",  
      "createdAt": "2026-02-17T10:30:00Z",  
      "slaDeadline": "2026-02-18T10:30:00Z",  
      "breachSla": false  
    },  
    "transaction": {  
      "id": "tx_rem_123",  
      "type": "remittance",  
      "amount": 50000,  
      "currency": "NOK",  
      "recipientName": "Mama Jasmina",  
      "createdAt": "2026-02-10T14:00:00Z",  
      "completedAt": "2026-02-10T14:01:23Z"  
    },  
    "messages": [  
      {  
        "id": "msg_1",  
        "senderType": "user",  
        "message": "I did not authorize this payment..."  
      }  
    ]  
  }  
}
```

```
    "createdAt": "2026-02-17T10:30:00Z"
  },
  {
    "id": "msg_2",
    "senderType": "system",
    "message": "We have contacted your bank to initiate a refund. You should receive the
refund within 1 business day.",
    "createdAt": "2026-02-17T10:31:00Z"
  }
],
"actions": [
  {
    "id": "act_1",
    "actionType": "status_change",
    "performedBy": "system",
    "details": "{\"from\":\"submitted\",\"to\":\"bank_contacted\"}",
    "createdAt": "2026-02-17T10:31:00Z"
  }
]
}
}
```

Authorization:

- User can only view their own disputes (404 if not theirs)

POST /api/disputes/[id]/messages

Add user message (provide additional evidence).

Request:

```
{
  "message": "I have contacted my bank and they confirmed my BankID was compromised on Feb 9."
}
```

Response (201):

```
{
  "data": {
    "id": "msg_3",
```

```
"disputeId": "dsp_abc123",
"senderType": "user",
"message": "I have contacted my bank...",
"createdAt": "2026-02-17T12:00:00Z"
}
}
```

Side effects:

- Update `dispute.updated_at`
- If status was `evidence_requested`, transition to `under_review`
- Audit log: `dispute.message_added`

POST /api/disputes/[id]/withdraw

User withdraws dispute.

Request:

```
{
  "reason": "Resolved directly with recipient"
}
```

Response:

```
{
  "data": {
    "id": "dsp_abc123",
    "status": "withdrawn",
    "withdrawnAt": "2026-02-17T13:00:00Z"
  }
}
```

Side effects:

- Transition to `withdrawn` status (terminal)
- Audit log: `dispute.withdrawn`
- System message: "User withdrew dispute: [reason]"

5.2 Admin Endpoints

All admin endpoints require `requireAdmin()` middleware.

GET /api/admin/disputes

List ALL disputes with filters.

Query params:

- `page`, `limit`
- `status` (filter)
- `priority` (filter)
- `disputeType` (filter)
- `breachSla` (boolean filter: show only SLA breaches)
- `sort` (`created_at_desc`, `sla_deadline_asc`, `priority_desc`)

Response:

```
{
  "data": [
    {
      "id": "dsp_abc123",
      "userId": "usr_demo1",
      "userName": "Amir Hadžić",
      "userEmail": "amir@example.com",
      "transactionId": "tx_rem_123",
      "disputeType": "unauthorized",
      "status": "bank_contacted",
      "priority": "high",
      "claimedAmount": 50000,
      "createdAt": "2026-02-17T10:30:00Z",
      "slaDeadline": "2026-02-18T10:30:00Z",
      "breachSla": false
    }
  ],
  "pagination": { ... },
  "summary": {
    "total": 15,
    "byStatus": {
      "submitted": 3,
      "under_review": 5,
      "bank_contacted": 2,
      "resolved_approved": 4,
```

```
    "resolved_denied": 1
  },
  "breachSla": 0
}
}
```

PATCH /api/admin/disputes/[id]

Update dispute status or priority.

Request:

```
{
  "status": "under_review",
  "priority": "critical",
  "notes": "Escalating due to large amount"
}
```

Response:

```
{
  "data": { /* updated dispute */ }
}
```

Side effects:

- Update `dispute.updated_at`
- If status changed to `resolved_approved` or `resolved_denied`, set `resolved_at`
- Audit log: `dispute.status_changed`
- System message added to `dispute_messages`

POST /api/admin/disputes/[id]/messages

Admin reply to user.

Request:

```
{
  "message": "We have reviewed your case. Your bank has confirmed the refund will be processed within 24 hours.",
  "changeStatus": "resolved_approved" // optional
}
```

Response (201):

```
{
  "data": {
    "id": "msg_4",
    "disputeId": "dsp_abc123",
    "senderType": "admin",
    "message": "We have reviewed your case...",
    "createdAt": "2026-02-17T13:00:00Z"
  }
}
```

Side effects:

- Update `dispute.updated_at`
- If `changeStatus` provided, update `dispute.status`
- Set `dispute.responded_at` (first admin response)
- Audit log: `dispute.admin_reply`
- Email notification to user (subject: "Svar på din dispute #{id}")
- Push notification: "Drop har svart på din dispute"

POST /api/admin/disputes/[id]/resolve

Manually resolve dispute.

Request:

```
{
  "resolutionType": "refund_full",
  "refundAmount": 50000, // øre
  "refundReference": "bank_ref_12345",
  "resolutionReason": "Bank confirmed unauthorized transaction. Refund processed.",
  "status": "resolved_approved"
}
```

Response:

```
{
  "data": {
    "id": "dsp_abc123",
    "status": "resolved_approved",
    "resolutionType": "refund_full",
```

```
"refundAmount": 50000,  
"resolvedAt": "2026-02-17T14:00:00Z"  
}  
}
```

Side effects:

- Update all resolution fields
- Set resolved_at
- Audit log: `dispute.resolved`
- System message: "Dispute resolved: [resolutionReason]"
- Email + push notification to user

POST /api/admin/disputes/[id]/escalate

Escalate to Finansklagenemnda (FinKN).

Request:

```
{  
  "reason": "User not satisfied with our decision to deny refund",  
  "externalCaseId": "FINKN-2026-12345" // optional, if already filed  
}
```

Response:

```
{  
  "data": {  
    "id": "dsp_abc123",  
    "status": "escalated",  
    "escalatedAt": "2026-02-17T15:00:00Z",  
    "externalCaseId": "FINKN-2026-12345"  
  }  
}
```

Side effects:

- Transition to `escalated` (terminal)
- Set escalated_at + external_case_id
- Audit log: `dispute.escalated`
- Email user with FinKN contact info

6. Integration with Banking System

6.1 Unauthorized Transaction Flow

Scenario: User claims they didn't authorize payment (fraud).

Drop's actions:

- Immediate response** (within 4 hours for critical, 24h for high):
 - Transition dispute to `bank_contacted`
 - Notify user's bank via API (if integrated) or email (if manual)
 - System message: "We have contacted your bank to initiate a refund."
- Provide evidence to bank:**
 - Transaction timestamp
 - SCA (BankID) authentication logs
 - IP address, user agent, device ID
 - User's account activity (login history)
 - Any previous disputes from this user
- Bank investigation:**
 - Bank verifies SCA was used correctly
 - If SCA valid → bank liable, refunds user within 1 business day
 - If SCA compromised → bank investigates further
- Drop receives bank decision:**
 - If refund approved → transition to `resolved_approved`
 - If refund denied → transition to `resolved_denied`
 - Update dispute with bank's `resolution_reason`

API integration (future):

```
// lib/services/bank-dispute.ts
export async function notifyBankOfDispute(params: {
  disputeId: string;
  transactionId: string;
  userId: string;
  bankId: string;
  evidence: {
    scaLogs: string;
    ipAddress: string;
    deviceId: string;
  };
}): Promise<{ caseId: string }> {
  // Call bank's dispute API (e.g., DNB, SpareBank1)
```

```
// For MVP: send email to bank's fraud department

const bankEmail = BANK_FRAUD_EMAILS[params.bankId] || "fraud@bank.no";

await email.send({
  to: bankEmail,
  subject: `Drop PISP Dispute Notification - Transaction ${params.transactionId}`,
  template: "bank-dispute-notification",
  data: {
    disputeId: params.disputeId,
    transactionId: params.transactionId,
    userId: params.userId,
    evidence: params.evidence,
  },
});

return { caseId: `DROP-${params.disputeId}` };
}
```

6.2 Technical Failure Flow

Scenario: Payment failed due to Drop system error (e.g., wrong amount sent).

Drop's liability: 100% — immediate refund required.

Actions:

- 1. Immediate acknowledgment** (within 4 hours):
 - Transition to `under_review`
 - System message: "We are investigating this issue."
- 2. Investigation:**
 - Check transaction logs, audit trail
 - Verify actual vs claimed amount
 - Check if idempotency key was reused (duplicate)
 - Review PISP provider logs
- 3. If Drop's fault confirmed:**
 - Transition to `resolved_approved`
 - Issue refund from Drop's operational account (not via bank)
 - Resolution type: `refund_full` or `refund_partial`
 - Create incident report in `admin_alerts` table
 - Notify ops team (Slack webhook)
- 4. If not Drop's fault:**

- Transition to `resolved_denied`
- Explain to user what happened (e.g., "Bank declined payment, no money was charged")
- Provide evidence (transaction status logs)

Refund implementation (MVP):

```

// lib/services/refund.ts
export async function issueRefund(params: {
  disputeId: string;
  transactionId: string;
  amount: number; // øre
  reason: string;
}): Promise<{ refundId: string; reference: string }> {
  // For MVP: Manual bank transfer
  // Future: Integrate with bank's refund API or PISP reverse payment

  const refundId = randomId("rfnd");

  // Create refund record
  await run(
    `INSERT INTO refunds (id, dispute_id, transaction_id, amount, reason, status, created_at)
    VALUES (?, ?, ?, ?, ?, 'pending', datetime('now'))`,
    [refundId, params.disputeId, params.transactionId, params.amount, params.reason]
  );

  // TODO: Call bank API to initiate reverse PISP payment
  // For MVP: Create admin task to process manual refund
  await createAdminTask({
    type: "manual_refund",
    priority: "high",
    title: `Process refund for dispute ${params.disputeId}`,
    description: `Amount: ${params.amount / 100} NOK\nReason: ${params.reason}`,
    assignee: "finance_team",
  });

  return { refundId, reference: `DROP-REFUND-${refundId}` };
}

```

6.3 Service Not Received Flow

Scenario: User authorized payment but recipient didn't deliver goods/service.

Drop's liability: €0 — commercial dispute between user and recipient.

Actions:

1. **Acknowledge** (within 5 business days):
 - Transition to `under_review`
 - System message: "We are reviewing your case."
2. **Provide transaction evidence:**
 - Recipient details (name, bank account, country)
 - Transaction timestamp and amount
 - Payment confirmation from PISP
 - Recommendation: "Contact recipient directly to request refund"
3. **Resolution:**
 - Transition to `resolved_denied`
 - Resolution reason: "This is a commercial dispute between you and the recipient. Drop cannot issue a refund as we do not hold funds. Please contact the recipient directly or seek legal advice."
 - Provide recipient contact info (if available)
 - Inform user of right to escalate to FinKN

No refund from Drop — user must resolve with recipient or pursue legal action.

7. UI Pages

7.1 /disputes — Dispute Center (User)

Layout:

- Header: "Mine tvister"
- Filter tabs: All | Active | Resolved | Escalated
- Dispute list:
 - Transaction summary (recipient/merchant, amount, date)
 - Dispute type badge
 - Status badge (color-coded)
 - SLA indicator (red if breached)
 - Created date
 - Unread indicator if admin replied

Empty state:

- "Ingen tvister"

- "Har du et problem med en betaling? Opprett en tvist"
 - CTA button: "Opprett tvist"
-

7.2 /disputes/new — Create Dispute (User)

Step 1: Select Transaction

- Show user's completed transactions (last 13 months)
- Filter: Remittance | QR Payment
- Each transaction shows:
 - Recipient/merchant name
 - Amount + date
 - Status (completed)
 - "Tvist denne betalingen" button

Step 2: Dispute Type

- Radio buttons:
 - "Jeg autoriserte ikke denne betalingen" (unauthorized)
 - "Feil beløp ble sendt" (incorrect_amount)
 - "Jeg ble belastet to ganger" (duplicate)
 - "Jeg mottok ikke tjenesten/produktet" (service_not_received)
 - "Teknisk feil" (technical_failure)
 - "Jeg vil ha refusjon" (refund_request)

Step 3: Details

- Reason (textarea, 20-2000 chars, required)
- Claimed amount (prefilled with transaction amount, editable for incorrect_amount)
- Character count indicator
- Upload evidence (future — buttons disabled for MVP)

Step 4: Review & Submit

- Summary of dispute
 - Transaction details
 - Disclaimer (based on type):
 - Unauthorized: "Vi vil kontakte banken din umiddelbart. Du skal få refusjon innen 1 virkedag."
 - Service not received: "Dette er en kommersiell tvist mellom deg og mottakeren. Drop kan ikke refundere, men vi vil gi deg dokumentasjon."
 - Technical failure: "Vi vil undersøke dette og refundere hvis det er vår feil."
 - "Send tvist" button
-

7.3 /disputes/[id] — Dispute Detail (User)

Layout:

- Dispute header:
 - Status badge + priority badge
 - Transaction summary (link to /transactions/[id])
 - Dispute type
 - Amount claimed
 - Created date
 - SLA deadline (if not resolved) — show countdown timer if < 24h
 - SLA breach indicator (if missed deadline)
 - Timeline:
 - Initial submission
 - Status changes
 - Admin responses
 - Resolution (if applicable)
 - Message thread (chat-style):
 - User messages (left-aligned)
 - Admin messages (right-aligned, green accent)
 - System messages (centered, gray)
 - Timestamps
 - Action panel:
 - If status = `evidence_requested`: "Gi mer informasjon" button → message form
 - If status = `resolved_denied`: "Send til Finansklagenemnda" button (see Section 7.4)
 - If status = `submitted` or `under_review`: "Trek tilbake tvist" button
 - If status = `terminal`: No actions
-

7.4 External Complaint (FinKN)

Route: `/disputes/[id]/escalate`

Content:

- Heading: "Send klage til Finansklagenemnda"
- Explanation:
 - "Hvis du ikke er fornøyd med vår avgjørelse, kan du sende klagen til Finansklagenemnda (FinKN)."
 - "FinKN er en uavhengig tvisteløsningsinstans for finansielle tjenester."
 - "Drop vil samarbeide fullt ut med FinKN i deres undersøkelse."
- FinKN contact info:
 - **Address:** Postboks 53 Skøyen, 0212 Oslo
 - **Website:** finansklagenemnda.no
 - **Email:** post@finkn.no

- **Phone:** +47 23 13 19 60
 - "Send til FinKN" button:
 - Transitions dispute to `escalated` status
 - Sends email to user with FinKN contact info + case summary
 - Creates admin alert for ops team
-

7.5 /admin/disputes — Admin Dashboard

Layout:

- Header: "Dispute Management"
 - Summary cards:
 - Active disputes (count)
 - SLA breaches (count, red if > 0)
 - Resolved last 7 days (count)
 - Average resolution time
 - Filter bar:
 - Status dropdown (all, submitted, under_review, etc.)
 - Priority dropdown (all, critical, high, normal, low)
 - Dispute type dropdown (all, unauthorized, etc.)
 - SLA breach toggle (show only breached)
 - Sort dropdown (Newest, SLA Deadline, Priority)
 - Dispute table:
 - ID (clickable)
 - User (name + email)
 - Transaction (ID + amount)
 - Dispute type badge
 - Status badge
 - Priority badge
 - Created
 - SLA deadline (color-coded: green >6h, yellow 1-6h, red <1h or breached)
 - Actions: "View", "Resolve"
-

7.6 /admin/disputes/[id] — Admin Detail

Layout:

- Dispute header (same as user view)
- User info: email, phone, KYC status, account created date
- Transaction info: type, amount, recipient, bank account, completed date
- Dispute details: reason, claimed amount, evidence
- Status & Priority controls:
 - Status dropdown (editable)

- Priority dropdown (editable)
 - "Lagre endringer" button
 - Message thread (same as user view)
 - Admin action panel:
 - Text area for admin reply (10 rows)
 - "Change status to:" dropdown (optional)
 - "Send svar" button
 - Resolution panel (if not yet resolved):
 - Resolution type: dropdown (refund_full, refund_partial, no_refund, reversed_payment)
 - Refund amount: input (øre)
 - Refund reference: input (bank ref)
 - Resolution reason: textarea
 - "Resolve Dispute" button
 - Escalation panel:
 - "Escalate to FinKN" button
 - External case ID: input (optional)
 - Reason: textarea
 - Audit trail (bottom):
 - All actions from dispute_actions table
 - Expandable JSON details
-

8. Email Notifications

8.1 Dispute Submitted (Auto-Confirmation)

Subject: "Tvist opprettet - #{dispute_id}"

Body (Norwegian):

Hei,

Vi har mottatt din tvist angående transaksjon #{transaction_id}.

Tvisttype: {dispute_type_label}

Beløp: {claimed_amount} NOK

Status: Under behandling

{type_specific_message}

Du kan følge statusen her:

{NEXT_PUBLIC_APP_URL}/disputes/{dispute_id}

Forventet responstid: {sla_deadline}

Vennlig hilsen,
Drop Kundestøtte

Type-specific messages:

- **Unauthorized:** "Vi har kontaktet banken din umiddelbart. Du skal motta refusjon innen 1 virkedag."
- **Technical failure:** "Vi undersøker saken og vil svare deg innen 24 timer."
- **Service not received:** "Dette er en kommersiell tvist. Vi vil gi deg dokumentasjon, men kan ikke refundere direkte."

8.2 Admin Response

Subject: "Svar på din tvist #{dispute_id}"

Body:

Hei,

Vi har svart på din tvist:

{admin_message}

Logg inn på Drop for å se hele samtalen:

{NEXT_PUBLIC_APP_URL}/disputes/{dispute_id}

Hvis du har flere spørsmål, kan du svare direkte i tvisten.

Vennlig hilsen,
Drop Kundestøtte

8.3 Dispute Resolved

Subject (approved): "Tvist godkjent - Refusjon behandles" **Subject (denied):** "Tvist avslått - Se forklaring"

Body (approved):

Hei,

Din tvist har blitt godkjent.

Refusjon: {refund_amount} NOK

Referanse: {refund_reference}

Forklaring: {resolution_reason}

{refund_timeline_message}

Se detaljer:

{NEXT_PUBLIC_APP_URL}/disputes/{dispute_id}

Vennlig hilsen,

Drop Kundestøtte

Body (denied):

Hei,

Din tvist har blitt avslått.

Forklaring: {resolution_reason}

Hvis du ikke er fornøyd med avgjørelsen, kan du sende klagen til Finansklagenemnda (FinKN):

{NEXT_PUBLIC_APP_URL}/disputes/{dispute_id}/escalate

Vennlig hilsen,

Drop Kundestøtte

9. Integration with Existing Systems

9.1 Link to Transaction Failure Spec

Spec: `/Users/makinja/system/specs/drop-transaction-failure-spec.md`

Integration points:

1. Transaction stuck detection:

- If transaction stuck in `processing` or `timeout` for >24h → auto-create dispute with `type=technical_failure`
- Priority: high
- Reason: "Transaction failed to complete after 24 hours"

2. Failed transaction with money deducted:

- If transaction status=`failed` BUT bank debited user's account → user can dispute
- Dispute type: `technical_failure`
- Drop investigates via `reconciliation-worker.ts`

3. Partial failure compensation:

- If transaction has `compensation_status=failed` → auto-create dispute
- Dispute type: `technical_failure`
- Priority: critical
- Reason: "Refund failed after partial payment"

Implementation:

```
// In reconciliation-worker.ts (from transaction failure spec)
if (tx.status === 'processing' && hoursSinceCreated > 24) {
  await createAutoDispute({
    transactionId: tx.id,
    userId: tx.user_id,
    disputeType: 'technical_failure',
    priority: 'high',
    reason: 'Transaction failed to complete after 24 hours',
    claimedAmount: tx.amount,
  });
}
```

9.2 Link to Customer Support Spec

Spec: `/Users/makinja/system/specs/drop-customer-support-spec.md`

Integration points:

1. Dispute from support ticket:

- If support ticket category=`dispute` → create dispute automatically
- Copy ticket description to dispute reason
- Link ticket to dispute (bidirectional)

2. Support ticket from dispute:

- User can open support ticket from dispute detail page

- "Trenger du hjelp?" button → creates ticket with context

3. Shared message thread:

- Admin can view both support tickets and disputes in unified inbox
- User's conversation history visible to support team

Implementation:

```
// In support ticket creation (from customer support spec)
if (ticketCategory === 'dispute') {
  const dispute = await createDispute({
    transactionId: ticketData.transactionId,
    userId: ticketData.userId,
    disputeType: 'service_not_received', // default, user can change
    reason: ticketData.description,
    claimedAmount: ticketData.amount,
  });

  // Link ticket to dispute
  await run(
    "UPDATE support_tickets SET dispute_id = ? WHERE id = ?",
    [dispute.id, ticketId]
  );
}
```

9.3 Link to Complaints System

Table: `complaints` (already exists in db.ts)

Relationship:

- Disputes are structured (transaction-specific, formal resolution)
- Complaints are unstructured (general feedback, service quality)

Integration:

1. Complaint → Dispute:

- If complaint category=`transaction` → suggest creating dispute
- "Opprett formell tvist" button in complaint detail page

2. Dispute → Complaint:

- If user is unsatisfied with resolved_denied → can file general complaint
 - Complaint linked to original dispute for context
-

10. Acceptance Criteria

10.1 Database

- disputes table created with all fields and constraints
- dispute_messages table created with foreign key to disputes
- dispute_actions table created for audit trail
- Indexes created for performance (user_id, transaction_id, status, sla_deadline)
- Schema works for both SQLite (dev) and PostgreSQL (production)

10.2 API Endpoints

- POST /api/disputes creates dispute + calculates SLA deadline
- GET /api/disputes returns user's disputes with pagination
- GET /api/disputes/[id] returns dispute + messages + transaction + actions
- POST /api/disputes/[id]/messages adds user message
- POST /api/disputes/[id]/withdraw marks dispute withdrawn
- GET /api/admin/disputes returns all disputes (admin only)
- PATCH /api/admin/disputes/[id] updates status/priority (admin only)
- POST /api/admin/disputes/[id]/messages adds admin reply + sends email
- POST /api/admin/disputes/[id]/resolve resolves dispute with refund details
- POST /api/admin/disputes/[id]/escalate escalates to FinKN

10.3 Authorization

- Users can only view their own disputes (404 on unauthorized access)
- Admin endpoints require admin role (403 if not admin)
- Transaction ownership validated (can't dispute someone else's transaction)
- CSRF protection via validateOrigin() middleware

10.4 SLA Management

- SLA deadline calculated correctly based on dispute type + priority
- Business hours calculation (Mon-Fri 09:00-17:00, skip weekends + holidays)

- SLA breach flag set if deadline missed
- Admin dashboard shows SLA breaches prominently

10.5 UI Pages

- /disputes shows user's disputes with status filter
- /disputes/new shows multi-step dispute creation form
- /disputes/[id] shows conversation thread + action buttons
- /disputes/[id]/escalate shows FinKN contact info + escalation button
- /admin/disputes shows all disputes with filters (status, priority, type, SLA breach)
- /admin/disputes/[id] shows detail + admin action panel

10.6 Integration

- All dispute actions logged to audit_log table
- Disputes linked to transactions (bidirectional)
- Transaction detail page shows dispute status (if exists)
- Email notifications sent for dispute events (submitted, admin reply, resolved)
- Push notifications sent for status changes
- Auto-dispute created for stuck transactions (>24h)
- Support tickets can create disputes (if category=dispute)

10.7 Validation

- Transaction must be completed (can't dispute pending/failed)
- Dispute window: max 13 months since transaction
- No duplicate dispute for same transaction
- Reason: 20-2000 chars, sanitized
- Status transitions validated (finite state machine)

10.8 Edge Cases

- User can't create multiple disputes for same transaction
- Resolved disputes can't be reopened (only escalated if denied)
- Withdrawn disputes are final (can't un-withdraw)

- SLA deadline doesn't count weekends or Norwegian public holidays
 - Email notifications handle missing user email gracefully
-

11. Implementation Order

Phase 1: Database + Types (Day 1)

1. Add schemas to `src/lib/db.ts` (SQLite + PostgreSQL versions)
2. Create `src/types/dispute.ts`
3. Create `src/lib/dispute-utils.ts` (SLA calculation, status validation)
4. Add `requireAdmin()` to `src/lib/middleware.ts` (if not exists)

Phase 2: User API (Day 1-2)

1. POST `/api/disputes` (create)
2. GET `/api/disputes` (list)
3. GET `/api/disputes/[id]` (detail)
4. POST `/api/disputes/[id]/messages` (add message)
5. POST `/api/disputes/[id]/withdraw` (withdraw)

Phase 3: User UI (Day 2-3)

1. `/disputes` (list page)
2. `/disputes/new` (multi-step creation form)
3. `/disputes/[id]` (conversation view)
4. `/disputes/[id]/escalate` (FinKN escalation page)
5. Components: `dispute-card`, `dispute-badge`, `message-bubble`, `sla-indicator`

Phase 4: Admin API (Day 3)

1. GET `/api/admin/disputes` (list all)
2. PATCH `/api/admin/disputes/[id]` (update status/priority)
3. POST `/api/admin/disputes/[id]/messages` (admin reply)
4. POST `/api/admin/disputes/[id]/resolve` (manual resolution)
5. POST `/api/admin/disputes/[id]/escalate` (escalate to FinKN)

Phase 5: Admin UI (Day 4)

1. /admin/disputes (dashboard with filters)
2. /admin/disputes/[id] (detail + action panel)

Phase 6: Integration (Day 4-5)

1. Audit logging for all dispute actions
2. Email notifications (submitted, admin reply, resolved)
3. Push notifications for status changes
4. Link to transaction failure spec (auto-dispute for stuck transactions)
5. Link to support ticket spec (dispute from ticket)

Phase 7: Bank Integration (Day 5)

1. Unauthorized transaction flow (notify bank, provide evidence)
2. Technical failure flow (refund from Drop operational account)
3. Service not received flow (provide documentation, no refund)

Phase 8: Testing + Refinement (Day 5-6)

1. Manual testing of all flows (user + admin)
 2. Edge case validation
 3. UI polish (spacing, colors, responsive)
 4. SLA calculation accuracy test
 5. Email template review
-

12. Dependencies

12.1 Existing Infrastructure

- Database: `src/lib/db.ts` (SQLite/PostgreSQL dual driver)
- Auth: `src/lib/auth.ts` (getCurrentUser, JWT validation)
- Middleware: `src/lib/middleware.ts` (requireAuth, sanitizeText, auditLog)
- Utils: `src/lib/utis-server.ts` (randomId)
- Email: Existing email service (to be determined)
- Push notifications: FCM (Firebase Cloud Messaging) or APNS

12.2 New Dependencies

None. All features use existing infrastructure.

12.3 External Services (Future)

- **Bank dispute API** — For automated refund requests (unauthorized transactions)
 - **FinKN API** — For automated case escalation (if available)
 - **SMS notifications** — For critical dispute updates (optional)
-

13. Testing Checklist

13.1 User Flows

1. **Create dispute (unauthorized):**
 - Select transaction
 - Choose "unauthorized" type
 - Submit reason
 - Verify auto-transition to `bank_contacted`
 - Verify email sent with SLA deadline
2. **Create dispute (service not received):**
 - Select transaction
 - Choose "service not received" type
 - Submit reason
 - Verify status = `submitted`
 - Verify email sent
3. **Add message to dispute:**
 - Open dispute detail
 - Add message
 - Verify status changes to `under_review` (if was `evidence_requested`)
4. **Withdraw dispute:**
 - Open dispute detail
 - Click "Trek tilbake"
 - Confirm
 - Verify status = `withdrawn` (terminal)
5. **Escalate to FinKN:**
 - Open resolved_denied dispute
 - Click "Send til FinKN"
 - Verify status = `escalated`
 - Verify email with FinKN contact info

13.2 Admin Flows

1. **View all disputes dashboard:**
 - Filter by status, priority, type

- Sort by SLA deadline
 - Verify SLA breach indicator
- 2. Reply to dispute:**
 - Open dispute detail
 - Add admin message
 - Change status to `under_review`
 - Verify email sent to user
 - 3. Resolve dispute (approved):**
 - Open dispute detail
 - Fill resolution panel (refund_full, amount, reference, reason)
 - Click "Resolve Dispute"
 - Verify status = `resolved_approved`
 - Verify email sent to user
 - 4. Resolve dispute (denied):**
 - Open dispute detail
 - Fill resolution panel (no_refund, reason)
 - Click "Resolve Dispute"
 - Verify status = `resolved_denied`
 - Verify email sent to user with FinKN escalation option
 - 5. Escalate to FinKN (admin):**
 - Open dispute detail
 - Click "Escalate to FinKN"
 - Enter external case ID + reason
 - Verify status = `escalated`

13.3 Edge Cases

- 1. Duplicate dispute:**
 - Try to create second dispute for same transaction
 - Verify 409 Conflict error
 - 2. Expired dispute window:**
 - Try to create dispute for transaction >13 months old
 - Verify 400 Bad Request error
 - 3. SLA deadline calculation:**
 - Create dispute on Friday 16:00
 - Verify SLA deadline is Monday 10:00 (skip weekend)
 - 4. Authorization:**
 - User A tries to view User B's dispute
 - Verify 404 Not Found
 - 5. Status transition validation:**
 - Try to transition from `resolved_approved` to `under_review`
 - Verify 400 Bad Request error
-

14. Future Enhancements (Out of Scope)

1. **File attachments** — Allow users to upload evidence (screenshots, receipts)
 2. **Video evidence** — Record screen for fraud proof
 3. **Multi-language support** — English, Bosnian translations
 4. **AI dispute classification** — Auto-detect dispute type from user's description
 5. **Automated refund triggers** — For specific patterns (e.g., duplicate transactions)
 6. **Bank API integration** — Direct API calls instead of email for unauthorized disputes
 7. **FinKN API integration** — Automated case filing
 8. **Dispute templates** — Pre-filled forms for common issues
 9. **Internal notes** — Admin-only notes not visible to user
 10. **Dispute analytics** — Dashboard showing dispute trends, resolution rates, SLA performance
-

15. Compliance Notes

15.1 PSD2 Article 71 (Unauthorized Transactions)

User's rights:

- Report unauthorized transaction within 13 months
- Receive refund within 1 business day (from bank, not Drop)
- No liability if SCA (BankID) was compromised through no fault of user

Drop's obligations:

- Notify user's bank immediately (within 24 hours)
- Provide transaction evidence (SCA logs, IP, device ID)
- Keep audit trail for 5 years
- Do NOT delay refund process

Liability shift:

- If SCA was performed correctly → bank liable (not Drop)
- If SCA was not performed → Drop liable (refund from operational account)
- If user was grossly negligent (shared BankID) → user liable (no refund)

15.2 PSD2 Article 74 (Complaint Handling)

Requirements:

- Respond to complaint within 15 business days
- Provide clear explanation of decision
- Inform user of right to escalate to FinKN
- FinKN contact info must be easily accessible

Drop's implementation:

- SLA: 5 business days for normal, 1 business day for unauthorized
- Email notification with resolution reason
- Escalation button in UI after `resolved_denied`
- FinKN contact info on `/disputes/[id]/escalate` page

15.3 GDPR Compliance

Data retention:

- Dispute records: 5 years (regulatory requirement)
- User messages: 5 years
- Audit trail: 5 years
- After 5 years: Archive to cold storage or delete (per GDPR)

User rights:

- Right to access: User can view all disputes and messages
- Right to rectification: User can add messages to correct information
- Right to erasure: Limited (regulatory retention overrides)
- Right to data portability: User can export dispute data (future)

Data minimization:

- Only collect necessary information (reason, amount, transaction ID)
 - No excessive evidence requests
 - File attachments limited to 5MB each (future)
-

16. Monitoring & Alerting

16.1 Metrics to Track

Metric	Threshold	Alert If
Active disputes (count)	10	> 50
SLA breaches (count)	0	> 0
Average resolution time (days)	3	> 7
Unauthorized disputes (%)	5%	> 15%
Dispute approval rate (%)	70%	< 50%
Escalations to FinKN (count)	1/month	> 5/month

16.2 Dashboard Queries

Active disputes:

```
SELECT COUNT(*) FROM disputes
WHERE status NOT IN ('resolved_approved', 'resolved_denied', 'escalated', 'withdrawn');
```

SLA breaches:

```
SELECT COUNT(*) FROM disputes
WHERE breach_sla = 1
AND status NOT IN ('resolved_approved', 'resolved_denied', 'escalated', 'withdrawn');
```

Average resolution time:

```
SELECT AVG(julianday(resolved_at) - julianday(created_at)) AS days
FROM disputes
WHERE resolved_at IS NOT NULL
AND resolved_at > datetime('now', '-30 days');
```

16.3 Slack Alerts

When to send:

- SLA breach** (any dispute misses deadline)
 - Channel: #ops
 - Priority: high
 - Message: "Dispute #{id} missed SLA deadline (type: {type}, priority: {priority}, user: {email})"
- Critical unauthorized dispute** (>10k NOK)
 - Channel: #fraud
 - Priority: critical

- Message: "High-value unauthorized dispute created: #{id} (#{amount} NOK, user: {email})"

3. Escalation to FinKN

- Channel: #ops
 - Priority: normal
 - Message: "Dispute #{id} escalated to FinKN by {user_email}. Case ID: {external_case_id}"
-

17. Open Questions (For Alem)

Q1: Refund Implementation

Question: How should we handle refunds for technical failures?

Options:

- Option A: Manual bank transfer (MVP) — Admin processes refund via bank UI
- Option B: PISP reverse payment (future) — Integrate with bank API for automatic refund
- Option C: Drop holds refund balance (NOT ALLOWED — breaks pass-through model)

Recommendation: Option A for MVP, migrate to Option B when bank APIs available.

Q2: Admin Role

Question: Who should have admin access to dispute dashboard?

Options:

- Option A: CEO (Alem) only
- Option B: CEO + finance team
- Option C: CEO + finance + support team

Recommendation: Option C — support team needs access to respond quickly.

Q3: FinKN Escalation Process

Question: Should we automate FinKN escalation or keep it manual?

Options:

- Option A: Manual (user clicks button, we send email)
- Option B: Semi-automated (user clicks button, we pre-fill FinKN web form)
- Option C: Fully automated (API integration if available)

Recommendation: Option A for MVP. Check if FinKN has API.

Q4: Dispute Notification Channels

Question: Email + push notifications both? Or only one?

Options:

- Option A: Email only (simpler, no push infra needed)
- Option B: Push only (faster, modern)
- Option C: Both (redundancy, user preference)

Recommendation: Option C. Email is fallback if user disabled push.

Q5: Dispute Evidence (Future)

Question: Should we allow file uploads (screenshots, receipts)?

Options:

- Option A: No (text only, simpler MVP)
- Option B: Yes (better evidence, but needs file storage + moderation)

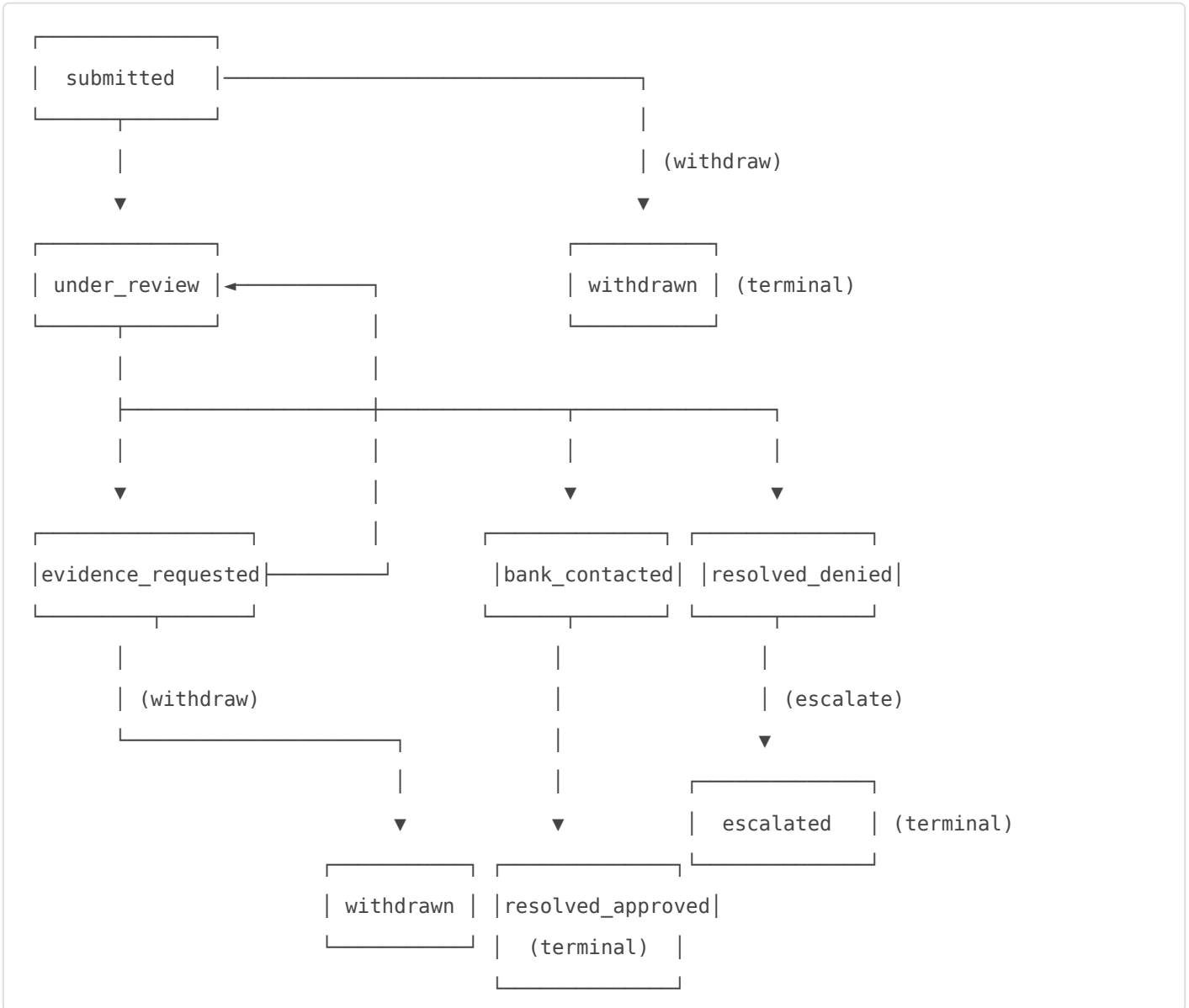
Recommendation: Option A for MVP. Add file uploads in Phase 2 when we have S3/Cloudflare R2 storage.

18. Next Steps

1. **Review this spec** with Alem
2. **Approve/reject sections** (or request changes)
3. **Answer open questions** (Q1-Q5)
4. **Prioritize phases** (which to implement first?)
5. **Assign to builder agent** (one phase at a time)
6. **Validation after each phase** (validator agent checks implementation)

Estimated timeline: 6 days for Phases 1-6, Phase 7-8 can run in parallel.

Appendix A: State Transition Diagram (ASCII)



Appendix B: Norwegian Translations

English	Norwegian	Context
Dispute	Tvist	Formal complaint
Claim	Krav	Amount claimed
Unauthorized	Uautorisert	Fraud

English	Norwegian	Context
Chargeback	Tilbakeføring	Refund
Resolution	Avgjørelse	Final decision
Escalate	Eskalere	Send to FinKN
Evidence	Dokumentasjon	Proof
Refund	Refusjon	Money back
Complaint	Klage	General issue

Appendix C: PSD2 Regulatory Sources

Primary sources:

1. [PSD2: Impacts and Compliance for Merchants](#)
2. [What is PSD2 everything to know for compliance - Adyen](#)
3. [The Payment Services Contract: PSD2 Requirements and PSD3 Perspectives - ILP Abogados](#)
4. [What is PSD2? How it Impacts Banks, Businesses & Chargebacks911](#)
5. [How European merchants can reduce chargebacks and protect revenue in 2026 | GR4VY](#)

Regulatory bodies:

- **Finanstilsynet** (Norway) — Financial regulator
- **Finansklagenemnda (FinKN)** — External dispute resolution

END OF SPEC

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