MERCHANT GUIDELINES

Scalapay materials and CCD2 for French customers

Applies from 20 November 2026

As of 5 November 2026

Attention: confidential information, do not share externally

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What changes on 20 November, and for whom

FR

French customers

From 20 November 2026, Pay in 3, Pay in 4 and Pay Later fall under French consumer credit rules, even when interest-free. Wherever Scalapay is shown to French customers, it must carry the information required by law. This applies wherever your business is located.

IT · ES · PT · NL

Italian, Spanish, Portuguese and Dutch customers

Scalapay remains available and nothing changes for now. We will let you know if local rules change.

BE · FI · AT · DE

Belgian, Finnish, Austrian and German customers

From 20 November 2026, Scalapay temporarily stops accepting orders from customers in these countries, due to regulatory uncertainty under CCD2. We expect to resume in some of them in the coming months and will keep you informed. If your business is based there, you can keep offering Scalapay to customers from the other markets.

What you need to do: update the Scalapay widget and use only our latest materials, unchanged. We take care of the rest.

Your checklist before 20 November 2026

If you have French customers, there are two things to do. Everything else is handled by Scalapay.

1 Update the Scalapay widget

Make sure your website runs the latest Scalapay widget (v5). The widget is credit advertising, so an older version is not compliant from 20 November.

How to do it: page 5

2 Use only our latest materials

- Review your website, app, emails, social channels and stores for anything that mentions Scalapay, instalments, paying later or financing
- Remove any content about Scalapay you created yourself, and any older Scalapay material
- Replace it with the latest marketing materials we have shared with you, unchanged

How to use them: page 6

Deadline: 20 November 2026

Update the Scalapay widget (version 5.2)

1

Check your website (1 minute)

Open a product page, right-click and choose Inspect, then search (Ctrl+F, Cmd+F on Mac) for `scalapay-widget`. Check two things: the script address contains `widget/v5` or `version=V5`, and `merchant-token='3LQDGJYPC'` is there.

Both are there: you are done, Scalapay switches you to 5.2 automatically. **No Scalapay widget on your site:** nothing to do.

2

If one of them is missing, update it. There are two scenarios:

You use an e-commerce plugin

WooCommerce, PrestaShop, Magento, Shopify and others

- Update the Scalapay plugin to its latest version from your back office
- Paste the Adyen merchant token 3LQDGJYPC in the Scalapay widget settings
- Clear your cache and repeat step 1

You have a custom integration

The Scalapay code was added by your developers

- Ask your developer to replace any older Scalapay script and widget tag with the new ones
- Script: `cdn.scalapay.com/widget/v5/js/scalapay-widget.js`
- Use the widget 5.2 guide with token 3LQDGJYPC

Widget still not updated, or running into problems? Contact us: see page 10.

Merchant token: all Adyen merchants use the same token, 3LQDGJYPC, in production only. You don't need a token of your own.

How to use Scalapay materials

Use them as provided

Do not edit, shorten, translate, crop or resize them in a way that hides or separates any part, in particular the lender identification, the risk warning and the representative example.

Don't create your own content

No own messages, banners, emails, posts or videos about Scalapay instalments, deferred payment or financing, and no own claims next to Scalapay materials.

No own promotions

Any promotion involving Scalapay is prepared and published by Scalapay.

Keep the legal information

On social media, stories, SMS or video, always keep the caption, link or end screen that contains it.

In store

Use Scalapay in-store materials, ordered from your Scalapay representative. A QR code at the till that takes customers to the Scalapay journey can be used.

Missing a format?

Need a material for a channel or format we don't cover? Open a request (page 10) and we will prepare it.

Monitoring. Scalapay may review websites and campaigns, including with automated tools. We will tell you about any issue and give you reasonable time to fix it. Serious or repeated breaches may lead to suspension of Scalapay on your store.

French customers: what applies from 20 November 2026

Legal framework

Rules: Consumer Code, as amended by Ordinance no. 2025-880 (3 Sep 2025), Ordinance no. 2025-1154 (2 Dec 2025) and Decree no. 2026-105 (19 Feb 2026)

Authorities: ACPR, DGCCRF

Applies to: advertising disseminated from 20 November 2026

Risk warning in Scalapay materials

Attention ! Un crédit coûte de l'argent et doit être remboursé.

Next to every message about instalments, paying later or financing, with at least the same prominence.

What this means for you

Our materials are complete

Pay in 3 and Pay in 4 materials carry the full information, including the total cost of credit. You don't need to add anything.

The widget counts as advertising

The Scalapay widget is credit advertising, so it must be the latest version, supplied with all the required information.

All products stay available

Pay in 3, Pay in 4 and Pay Later remain available to your French customers.

French customers: which message goes where

Use	Message shown (français)	English reference	Disclosure
Brand only	Payez avec Scalapay · Scalapay disponible au paiement	Pay with Scalapay · Scalapay available at checkout	Generic
Pay in instalments	Payez en plusieurs fois avec Scalapay	Pay in instalments with Scalapay	Standard
Pay in 3	Payez en 3 fois avec Scalapay	Pay in 3 instalments with Scalapay	Standard
Pay in 3, interest-free	Payez en 3 fois sans intérêts avec Scalapay	Pay in 3 interest-free instalments with Scalapay	Standard
Pay in 4	Payez en 4 fois avec Scalapay	Pay in 4 instalments with Scalapay	Standard
Pay in 4, interest-free	Payez en 4 fois sans intérêts avec Scalapay	Pay in 4 interest-free instalments with Scalapay	Standard
Pay Later	Achetez maintenant, payez dans 15 ou 30 jours avec Scalapay	Buy now, pay in 15 or 30 days with Scalapay	Standard

Brand only (generic message)
Payment-method lists and footer badges, with no reference to instalments, paying later or financing.

All other messages (standard disclosure)
Product page, cart, banners, email, social and in store, always as supplied by Scalapay. Full text in the appendix, page 19.

Frequently asked questions

? Will Scalapay update the widget for me?

No. Each merchant updates its own widget, following the steps on page 5. Contact us if you run into problems.

? Do I need to add anything to the materials?

No. They already include what the law requires: Scalapay as lender, the risk warning and the representative example.

? Do I need to carry out credit checks?

No. Scalapay assesses creditworthiness within its own journey and decides on each application. Nothing changes in your checkout.

? Do I need to show pre-contractual information?

No. Scalapay gives it to each customer in the Scalapay journey (the FIPEN). It does not go on your product or checkout pages.

? What if I keep my own texts or banners?

You are responsible for their compliance. Scalapay may ask you to remove them, and serious or repeated breaches may lead to suspension.

? I need a material that isn't covered

Open a request with the link on page 10 and we will prepare it.

Need help?

?

Open a request

Open a request on the Scalapay support page. Our team will get back to you on anything about the widget, the materials or these guidelines.

Widget 5.2 step-by-step guide: EN · FR · IT · ES

Go to Scalapay support

Quick answers

p. 5 How to update the widget

p. 6 How to use Scalapay materials

p. 8 Which message goes where

p. 9 Frequently asked questions

Reference material continues in the appendix, pages 12 to 19.

Appendix

Reference only: background on CCD2 and what Scalapay materials contain. You don't need to add or copy anything.

What is CCD2

Directive (EU) 2023/2225 (CCD2) replaces the 2008 Consumer Credit Directive. From 20 November 2026 it brings instalment and deferred-payment credit granted by a third-party lender, such as Pay in 3, Pay in 4 and Pay Later, within consumer credit rules, regardless of the amount and even when no interest is charged.

What advertising must include

A clear and prominent warning that borrowing money involves costs. Where it mentions a rate or any figure on the cost of credit, including an interest-free claim, it must also give a representative example. Scalapay builds all of this into its materials.

Where it applies

Each country applies CCD2 through its own law. France has completed this, so the rules apply there from 20 November 2026. In Italy, Spain and Portugal it is still in progress and the current rules continue to apply.

The one rule for merchants: use only the advertising materials provided by Scalapay, exactly as Scalapay provides them.

Scalapay's role and yours

Scalapay IP S.p.A.
The lender

- Decides on each application and assesses creditworthiness
- Gives customers the pre-contractual information and is their contact for the credit
- Prepares all advertising of its products, with what the law requires: lender identification, risk warning and representative example

You
The merchant

- Offer Scalapay at checkout like your other payment methods
- Display only the materials Scalapay provides
- Send customers with questions about the credit to Scalapay
- Leave the credit to Scalapay: don't present or explain its conditions, help with the application or accept agreements on Scalapay's behalf

Offering Scalapay as a payment method does not make you a credit intermediary. Taking part in presenting, offering or concluding the credit could, and may require an authorisation or registration. Receiving any payment or benefit from Scalapay linked to credit agreements is also not allowed.

What Scalapay materials contain

If the material shows only the Scalapay name or logo

No reference to instalments or deferred payment. Scalapay includes nothing further.

If the material mentions instalments, deferred payment, interest-free, a rate, an instalment amount or any cost, Scalapay includes:

Lender identification	**Risk warning**	**Cash price**
Down payment	**Total amount of credit**	**Number and amount of instalments**
Fixed borrowing rate	**Fees**	**Total cost of credit**
APR	**Total amount payable**	**Full representative example**

The total cost of credit is always shown.

The risk warning

France **Attention ! Un crédit coûte de l'argent et doit être remboursé.** (Attention! Credit costs money and must be repaid.)

Wording

The local wording above. Scalapay uses the same text in all its materials for France.

Prominence

At least as visible as the promotional message. In the cost information, no item is more prominent than the APR.

Placement

Next to the promotional message. On small screens part of the information may be one click or scroll away: keep Scalapay's link or expander working.

Audio and video

Read out or shown on screen at the same time as the credit message, as supplied by Scalapay.

Figures are set by Scalapay. They are updated when terms change. Never change them.

Content that never appears in Scalapay materials

Prohibited by law

- Suggesting that credit improves the customer's financial situation, adds to their resources, replaces savings or raises their standard of living
- Stating that existing credit or credit-database records have little or no effect on approval
- Highlighting how easy it is to obtain credit
- Mentioning grace periods longer than three months
- Promotional prizes linked to accepting a credit offer
- Making a purchase conditional on taking another product or service (tied selling)

Scalapay rules

- Claims on how easy or fast approval is (e.g. "instant approval", "no checks")
- Discounts, gifts or other benefits reserved to customers who pay with Scalapay
- Content aimed at minors
- Products that are not enabled for the store

Scalapay products

3

Pay in 3

Interest-free instalments

The purchase is split into 3 instalments, the first one at checkout. No interest.

4

Pay in 4

Interest-free instalments

The purchase is split into 4 instalments, the first one at checkout. No interest; a service fee may apply.

15/30

Pay Later

Interest-free deferred payment

The full amount is paid 15 or 30 days after the purchase. No interest.

All three products are available to French customers.

France: what Scalapay materials comply with

L. 312-4-1	Scalapay does not use the exemption for short-term interest-free credit: Pay in 3 and Pay in 4 materials carry the full advertising information, including the total cost of credit.
Widget	The Scalapay widget is credit advertising and is supplied with all the required information.
L. 312-10	Scalapay materials never highlight how easy it is to obtain credit and never mention grace periods longer than three months.
L. 312-11 · L. 121-11	No promotional prize is linked to accepting a credit offer, and no purchase is made conditional on taking credit.

France: standard disclosure (Pay in 3, Pay in 4, Pay Later)

Français

Message publicitaire à caractère promotionnel. Scalapay IP S.p.A. offre la possibilité de régler vos achats en 3 ou 4 fois sans intérêts, ou en une seule fois à 15 ou 30 jours, sous réserve d'acceptation. Des frais de service peuvent s'appliquer aux paiements en 4 fois. Taux débiteur fixe 0 % et TAEG maximum 15,29 % (en cas de paiement en 4 fois). Exemple représentatif : prix au comptant du bien 95 €, sans apport, montant total du crédit 95 €, paiement en 4 échéances de 23,75 €, taux débiteur fixe 0 %, frais de service 1,70 €, coût total du crédit 1,70 €, TAEG 14,72 %, montant total dû 96,70 €. Avertissements : Financement soumis à l'acceptation de Scalapay IP S.p.A. Scalapay IP S.p.A., établissement de paiement agréé et supervisé par la Banque d'Italie, inscrit sous le n° 5 au registre des établissements de paiement (code 36018), TVA IT06078740484, agit en qualité de prêteur. Attention ! Un crédit coûte de l'argent et doit être remboursé. Les conditions d'utilisation disponibles sur Scalapay IP s'appliquent.

English reference

Advertising message for promotional purposes. Scalapay IP S.p.A. offers the option to defer payments in 3 or 4 interest-free instalments, or in a single payment after 15 or 30 days, subject to approval. Service fees may apply to payments in 4 instalments. Fixed borrowing rate 0% and maximum APR 15.29% (for payments in 4 instalments). Representative example: cash price of the goods €95, no down payment, total amount of credit €95, payment in 4 instalments of €23.75, fixed borrowing rate 0%, service fee €1.70, total cost of credit €1.70, APR 14.72%, total amount payable €96.70. Warnings: Financing subject to approval by Scalapay IP S.p.A. Scalapay IP S.p.A., a payment institution authorised and supervised by the Bank of Italy, registered under no. 5 in the Register of Payment Institutions (code 36018), VAT no. IT06078740484, acts as lender. Attention! Borrowing money involves costs. The terms of use available on Scalapay IP apply.

Scalapay materials in France are published in French. The English version is for reference only.