

## **The complaint**

The estate of Ms L complains about PayPal (Europe) Sarl et Cie SCA ("PayPal") bereavement process.

## **What happened**

When Ms L sadly passed away, her estate discovered she had an account with PayPal with an outstanding balance.

When the late Ms L's father contacted PayPal as one of the administrators of her estate to ask that the funds were transferred to his account, PayPal sent a list of documents that needed completing along with a request for identification.

The estate of Ms L complain that they completed all of the necessary documents, then PayPal asked for a copy of the bank statement for the account that the money would be transferred to. As the estate of Ms L felt this was an unfair request, it logged a complaint with PayPal.

PayPal looked into the complaint but didn't think it had done anything wrong. So, the estate of Ms L brought its complaint our service.

Our investigator looked into the complaint and upheld it at first. Our investigator couldn't find any information that required a consumer to submit a bank statement as part of the wire transfer or bereavement process.

PayPal responded with a copy of its internal process, that it said evidenced that it had followed the correct process. Our investigator looked into the new information and found it changed her view, so she decided to not uphold the complaint.

The estate of Ms L didn't agree with the investigator's view or her change in opinion. So, the complaints been passed to me for a final decision.

## **What I've decided – and why**

I've considered all the available evidence and arguments to decide what's fair and reasonable in the circumstances of this complaint.

Having done so, I intend to come to the same outcome as the investigator for largely the same reasons. I'll explain why.

I want to start by saying how extremely sorry I am to hear of the loss of Ms L. I can imagine the estate is going through a difficult time and it's been made harder having to also deal with a complaint.

For me to say PayPal did something wrong in this complaint, I'd need to be satisfied that it failed to act within its internal policy. Or, if I feel like it did work within these, that it was unfair

for it to do so in the circumstances of this complaint. And in this situation, I don't think that's the case. I'll explain why.

As a service we wouldn't usually advise businesses on what process it should follow as part of its security procedures. That's something as a business it has the autonomy to decide. Our service can look at whether it has applied the process or procedure fairly though.

Having considered the documents PayPal has asked for here and the reasons for them, I haven't found it has acted outside of its policy or unfairly with what it's requested. PayPal has said it has requested a copy of a bank statement to make sure it matches the details completed on the wire transfer form. This seems like a reasonable request to me.

I've also looked at the timeline it followed when asking the estate of Ms L to supply documentation. PayPal told our service that it didn't ask for a bank statement when the estate of Ms L first made contact, as at that point it wasn't sure where the funds would be requested to be paid. I've looked at the messages exchanged between PayPal and the estate of Ms L, and this is consistent with what PayPal has said.

Once the estate of Ms L made PayPal aware that it would be going to an external account in the name of one of the administrators of the estate, it was at that point it asked for a bank statement. I'm satisfied this was a reasonable request.

I've also checked the online bereavement process that the estate of Ms L would've had access to - this is something the estate of Ms L also refers to this in its communication with PayPal. The process looks to refer to paying money into an existing linked bank account, which is a different situation to what we have here, as the estate of Ms L want it paid into a new account not linked to the original PayPal account.

In summary, I know the estate of Ms L feel that the goal posts were moved here and that it had already provided enough information to satisfy any risk of the money going to an unintended account. But I have looked at the internal process PayPal follows in these circumstances, and I'm satisfied Ms L's estate hasn't been treated any differently to anyone else in a similar situation.

### **My final decision**

My final decision is that I don't uphold this complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask the estate of Ms L to accept or reject my decision before 23 December 2023.

Tom Wagstaff  
**Ombudsman**