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ICD Case Study

Communication, Accessibility, and Process Impact: The Opening of a Qonto

Business Account as a Case Study

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1. Preliminary Remarks and Objective

This case study examines a specific communication and process sequence in connection with the opening, activation, and subsequent use of a business account with Qonto. At the outset, we would like to make it expressly clear that the purpose of this case study is to offer constructive criticism, not to assign blame or pass judgment. Nor do we claim to be able, from an external perspective, to assess QONTO SA's internal processes, responsibilities, technical systems, decision-making pathways, or regulatory review procedures.

The ICD is familiar with these only to the extent that they are reflected in communications provided to the customer or explained by QONTO SA itself. Where internal circumstances may be relevant to assessing the observed course of events, they should therefore not be replaced by assumptions. Instead, the subject of this analysis is what became perceptible and consequential on the human side: What information did the customer receive? What could he determine from it? What actions were expected of him? What options for action were actually available to him? What effects did the process, as perceptible to him, have? And what time-related, organizational, cognitive, and communicative burdens resulted from it?



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In this context, the roles involved must be clearly distinguished. The author of this report is personally a Qonto customer and the individual directly affected by the events documented here. His perceptions, decisions, and descriptions of the resulting effects therefore form part of the external perspective examined in this study.

The Institute for Communication & Dignity (ICD) assumes the role of scientific observer. It documents the case, examines the available communication and its perceptible effects on the individual, and derives questions, assessments, and conclusions from them.

QONTO SA, by contrast, possesses the internal perspective. Only QONTO SA knows the actual internal procedures, technical interdependencies, responsibilities, decision-making pathways, and reasons for individual process steps. Where these may be relevant to assessing the observed course of events, the study will therefore refrain from speculation and instead ask QONTO SA for its perspective.

The objective of this case study is therefore not to set one perspective against the other. Rather, the aim is to synchronize the internal and external perspectives. QONTO SA knows what it intended and what actually occurs within its internal processes. The customer knows what reaches him and what effects the process has on him. Only communication between these two perspectives makes it possible to determine whether the intended process and the process actually experienced correspond.

1.1 Observation, Assessment, and Unknown Cause

The study deliberately distinguishes between an observable fact, its effect on the individual, the ICD's professional assessment, and a possible underlying cause. An observed effect is therefore not, without further basis, attributed to a specific internal cause. A communication problem may, for example, arise from technical, organizational,



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regulatory, or design-related circumstances. Which cause was actually present in the specific case often cannot be determined from an external perspective.

This does not, however, preclude clearly describing and assessing the effect of the observed process.

A central meta-question of the study is therefore:

- **What is the source of an observed barrier?**

The first question is whether a difficulty was created by the process at all. Not every difficulty is a barrier. Objectively necessary complexity remains complex even when a process is well designed. People also differ in their abilities, experience, and capabilities. The fact that one person can manage something more easily or more effectively than another does not, in itself, constitute either a disadvantage or a barrier.

The study therefore distinguishes between necessary difficulty and an avoidable obstacle. Of particular interest is whether an obstacle may have arisen precisely from a design that originally pursued another legitimate purpose. Simplification can reduce necessary information. Automation can restrict options for action. Increased efficiency can eliminate effort, but it can also merely shift that effort to another part of the process.

Economic optimization is also, in principle, a legitimate function of a business. However, where profit or efficiency interests are pursued to the point that they override human capacity to act, there is a general risk that new barriers may arise. This statement does not assert any corresponding motivation or cause on the part of QONTO SA. It describes a general potential mechanism through which barriers can arise and which may be relevant to the analysis of digital processes.

The study therefore asks not only whether a process functions, but also **for whom it functions, what effort it generates, and where that effort actually occurs.**



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1.2 Accessibility and Individual Abilities

In this case study, accessibility is understood neither as a special right nor as a requirement to adapt every process to all of an individual person's abilities. Its starting point is instead the question of which obstacles arise from the design of information, communication, and processes, whether those obstacles are necessary, and whether they can be eliminated or reduced.

Where a difficulty is objectively necessary and cannot reasonably be eliminated, it does not become a barrier merely because it is difficult. Likewise, there may be individual limitations that even a well-designed process cannot fully compensate for. At that point, the individual concerned may need to recognize their personal need for support and seek assistance.

The distinction between a systemic barrier and an individual need for support is therefore itself part of the analysis. This boundary, however, must not be defined exclusively from the perspective of people who do not themselves experience the barrier in question. The perceptions of affected individuals are a necessary source of insight when examining the actual effects of a particular process design.

The author of this report is neurodivergent. This fact is not cited in the case study in order to derive special rights from it or to make a universally applicable statement about neurodivergent people. It is relevant because certain process characteristics have concretely observable effects on him.

In particular, unclear process states, next steps that cannot be clearly identified, interruptions to an expected sequence, and repeated communication and clarification loops can create significant additional stress for him.



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Of particular interest, therefore, is also the effect of a support system that is approached specifically to resolve an existing uncertainty. If, for example, a chatbot is unable to answer a question and must repeatedly involve an operator, consult that operator, or transfer the clarification to them, the originally expected relief may fail to materialize. The existing need for clarification then not only remains unresolved; additional communication steps may further increase the burden.

This, too, does not automatically mean that a barrier exists. The decisive question remains where the difficulty originates, whether it was necessary to the task, and whether the resulting obstacle could have been avoided.

1.3 Capacity to Act as a Criterion of Analysis

From the perspective of this case study, the communicative quality of a process cannot be established merely by the fact that information exists somewhere or can, in principle, be found. What matters instead is whether, on the basis of the information actually available to them, a person can determine:

- what is happening;
- what it means for them;
- whether they need to act;
- what they need to do, if action is required; and
- what happens afterward.

The study therefore does not focus solely on technical functionality. A system may operate correctly from a technical standpoint while still imposing a substantial information, search, monitoring, or clarification burden on the individual.



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Conversely, not every additional burden is necessarily a deficiency. Here, too, the decisive question is whether it arises from the objectively necessary task or is avoidably added by the design of the process.

The individual's **capacity to act** therefore serves as a consistent point of reference throughout the study.

1.4 Legal and Normative References

Some of the questions arising from the course of the case touch not only on communication and process design, but also on legal or regulatory considerations. Such references are not introduced independently of the facts under examination. The starting point in each case remains a specific observation. Only when that observation raises a question to whose assessment a legal provision, case law, a statement by a supervisory authority, or another normative source can contribute is that reference incorporated into the analysis.

The study explains the origin of each such reference, its regulatory or protective purpose, and why it is relevant to the specific question under consideration. The study distinguishes between provisions that are directly applicable to the specific circumstances and rules that, because of their personal or substantive scope, have no direct legal effect on the case under examination but nevertheless reflect a legislative or regulatory value judgment relevant to the issue.

Such a normative reference is expressly identified as such. No direct legal obligation is derived from its purpose where the statutory requirements for such an obligation are not met in the specific case. Conversely, a legislative value judgment relevant to the study should not be disregarded solely because the specific circumstances fall outside its direct scope of application.



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The roles also remain distinct when legal assessments are made. The ICD may examine facts against a legal provision, assess the constituent legal requirements, and derive its own legal position from that analysis. Where it does so, that legal position is identified and substantiated as such. Binding legal determinations remain the responsibility of the competent courts and authorities.

1.5 Guiding Question of the Case Study

The individual observations in this case study are therefore not considered in isolation. They repeatedly lead back to the same overarching question:

- **Does the design of the process enable the individual to recognize what is happening, understand its significance, and retain the capacity to act autonomously – or do avoidable obstacles arise between the system and the individual that impair that capacity to act?**

Where such obstacles are observed, the aim is not to search prematurely for someone to blame. Instead, the study examines how they arise, what effects they have, whether they could potentially be avoided, and what information is still missing for a complete assessment.

The case study thus combines the customer's documented external perspective with the ICD's professional analysis while leaving room for QONTO SA's internal perspective.

- **Lack of knowledge about internal processes is not replaced by assumptions. Observable effects are nevertheless described no less clearly.**



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2. Accessibility as an Element of the Analysis

Within the context of this case study, accessible communication does not necessarily mean Easy Language or simplified language. Nor is accessibility equated with the lowest possible level of complexity. Information or a process may necessarily be demanding. The decisive question is instead whether avoidable obstacles are added to this necessary difficulty, making access to the information, its comprehension, or the action required as a result unnecessarily more difficult.

The question is therefore not exclusively:

- **“Can the recipient ultimately understand this information?”**

It is equally:

- **“How much time and cognitive effort does the recipient need in order to correctly comprehend the information, recognize its significance for the specific process, and act on it?”**

Accessibility is therefore not understood in this study as a state of complete simplicity. Rather, the study examines whether individuals can make use of their existing abilities without first having to overcome avoidable obstacles.

2.1 Factual Accuracy and Communicative Accessibility

Information may be factually correct and generally understandable and still create an avoidable obstacle if the recipient has to research additional context, search through earlier communications, interpret terminology, or independently determine what specific action is expected of them.



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A simple example illustrates this distinction:

“On the face of a clock, one is opposite seven.”

and

“On the face of a clock, one is axially diametrically opposite seven.”

Both statements may accurately describe the same fact. The informational content is therefore not necessarily different. What may differ, however, is the effort required to comprehend that content and process it immediately.

It would be wrong to classify every higher processing effort as a barrier. If a technical term is required to describe a complex matter unambiguously, its use may be objectively necessary. If, however, the same information can be communicated much more directly without any loss of accuracy, meaning, or function, the question arises as to why the recipient is required to expend the additional processing effort.

The criterion for analysis is therefore not:

- **“How simply can something be said?”**

but rather:

- **“What degree of complexity is required to communicate the information appropriately, and what additional effort beyond that would be avoidable?”**

2.2 Information Must Enable Action

For a digital process, merely providing information is not sufficient. The information must perform a function for the individual within the relevant context.



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This includes enabling the recipient to recognize:

- **which information is relevant to them;**
- **what significance it has in the current state of the process;**
- **whether it requires them to take action;**
- **what action, if any, is required; and**
- **how the process will proceed afterward.**

This criterion becomes relevant in the case under examination, for example, where the customer was asked to provide “required additional information” without the message in question specifying which particular information was still needed. A button labeled “Provide additional information” may technically enable an action. It does not, however, answer the preceding substantive question:

- What is to be provided?

This example illustrates the distinction between technical operability and the individual’s capacity to act. A person may be able to operate a button and still not know what is expected of them.

2.3 Findability, Assignment, and Process Context

The mere existence of information likewise does not answer the question of whether it fulfills its communicative function. Information may, for example, exist elsewhere in the system, appear in an earlier message, or be discoverable through a help function. The decisive question remains whether it is available to the individual within the process context in which it is needed.



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Three distinct questions therefore become relevant to this case study:

- **Is the information available?**
- **Can it be found at the required moment and is it assigned to the correct process step?**
- **Does it subsequently enable the individual to continue acting independently?**

This distinction is particularly important in self-service processes. In such processes, the customer deliberately assumes tasks that, under other organizational models, might be performed or supported by an employee of the provider.

This division of work is not inherently problematic. On the contrary, it can offer considerable advantages to both sides. It does, however, require the information necessary for independent completion of the task to be available and understandable at the point where the relevant action is to be performed.

Self-service therefore does not require less communication. It places particular demands on the precision of that communication and its assignment to the relevant process step.

2.4 Support Services as Part of the Process

If an existing uncertainty cannot be resolved within the actual process step, support services become particularly important. A help section, chatbot, support chat, or human contact may perform a supplementary function. For the effect on the individual, however, the decisive question is whether this additional communication channel actually reduces the existing need for clarification.

If a question is answered by a support system, the individual's capacity to act may thereby be restored. If, on the other hand, the system cannot answer the question and must



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repeatedly involve an operator, consult the operator, or refer the customer to another point of contact, the original need for clarification initially remains unresolved.

The support process may then itself generate additional information, time, and communication effort. This aspect is particularly relevant to the neurodivergent author of this report. Repeated transitions between the process, chatbot, and operator, having to reformulate questions already asked, and uncertainty as to when and from whom a reliable answer will be provided can intensify the stress already caused by the unresolved process state.

Neurodivergence does not in itself establish the existence of a barrier. Rather, it makes a specific process effect visible. The question established in Chapter 1 therefore remains decisive here as well:

- **Does the burden arise from a necessary difficulty inherent in the matter, or from additional avoidable communication and clarification steps?**

2.5 Legislative Assessments as a Normative Reference

The importance of perceivability, operability, and understandability in digital services is not exclusively a communication-science criterion developed by the ICD. The German legislature now expressly uses comparable criteria in the **Barrierefreiheitsstärkungsgesetz (BFSG)** and the regulation issued under it, the **Barrierefreiheitsstärkungsverordnung (BFSGV)**.

For certain covered services, the BFSGV requires, among other things, that digital information be provided consistently and appropriately and in a manner that is perceivable, operable, understandable, and robust. For consumer banking services, the same functional criteria are expressly applied to identification and authentication methods,



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security functions, and payment services. Information concerning the functioning of the banking service must be understandable.[1]

These provisions are not relied upon in this case study as a legal basis directly applicable to the ICD gUG business account under examination. At this point, the BFSG covers banking services for consumers. Under the statutory definition, a consumer is a natural person who uses the relevant service predominantly for purposes outside their trade, business, or self-employed professional activity.[2]

The account examined here, by contrast, serves the business activities of a legal entity. Nevertheless, the provisions referred to are of interest to this study as a normative reference. Through these provisions, the legislature expresses that, for certain digital services, the analysis is not limited to their mere technical availability. Perceivability, operability, and understandability are expressly recognized as characteristics of the quality of use.

It is also noteworthy that the statutory monitoring methodology for covered services does not merely examine individual interfaces or pieces of information in isolation. It provides for reviewing the procedural steps at least in the standard sequence followed by a typical user and includes, among other things, forms, dialog boxes, confirmations, error messages, and other feedback resulting from interaction with the user.[3]

This provision, too, is not applied as a directly binding assessment criterion to the B2B circumstances examined here. Its design is nevertheless methodologically relevant to the case study because it likewise considers the effect of a complete usage process rather than merely the isolated existence of individual functions.

The legislative development therefore confirms, at minimum, the fundamental relevance of a question also pursued by this case study:



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Not merely:

- **Is a function available?**

But also:

- **Can the individual perceive, understand, operate, and navigate the process as it actually unfolds?**

2.6 Accessibility as a Quality of the Process

Particularly in automated and self-service processes, the customer deliberately assumes tasks that would otherwise be performed, at least in part, within the provider's organization.

The way this division of work is structured is therefore decisive:

- **What effort does the customer assume?**
- **What information do they need in order to do so?**
- **What benefit do they receive from self-service?**
- **What responsibility is transferred to them?**

And what additional burdens arise when information, support, and process guidance do not sufficiently work together? Accessibility in this case study is therefore not reduced to an individual website, a piece of text, a button, or a technical accessibility aid. It is considered a characteristic of the interaction between information, process, and individual. An individual process step may be understandable when viewed in isolation and still become part of an overall process that requires repeated research, monitoring, and clarification.

The following chapters will therefore not merely ask whether the individual functions were technically available.



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Rather, the study will examine whether, as the process actually unfolded, the information and functions worked together in such a way that the individual was able to retain their capacity to act or, following a disruption, regain it without avoidable additional effort.

Footnotes

[1] See § 12 no. 2 lit. b, c, and h, and no. 3 BFSGV; for consumer banking services, in particular § 17(1) and (2) BFSGV. Under these provisions, the functions covered must, among other things, be perceivable, operable, understandable, and robust; information concerning the functioning of consumer banking services must be understandable.

[2] See § 1(3) no. 3 BFSG in conjunction with § 2 no. 16 BFSG. The BFSG covers banking services for consumers; the Act defines consumers as natural persons who use the relevant service for purposes that can predominantly be attributed neither to their trade or business nor to their self-employed professional activity.

[3] See Annex 1 to § 28 BFSG, no. 1 lit. a and b. The monitoring methodology provided for there includes, among other things, examination of all procedural steps at least in the standard sequence followed by a typical user, as well as interactions with forms and dialog boxes, confirmations, error messages, and other feedback.

3. Starting Point of the Analysis: Account Opening and Formation Phase

The process examined began with the opening of a business account for the newly established ICD – Institute for Communication & Dignity gUG (haftungsbeschränkt). The account opening could not be viewed as an isolated process. It formed part of a company formation process in which several interdependent steps were interconnected. These included, among other things, the formation documents, the payment of the share capital, the notarized and register-related formation of the company, its subsequent entry in the Commercial Register, and the full usability of the business account.



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This did not result in an exclusively linear sequence. Rather, several processes were mutually dependent:

- **Company formation → business account → share capital → Commercial Register → full account usability**

At the same time, the business account was already part of the practical formation process. Formation costs, ongoing obligations, and, subsequently, the company's ordinary payment transactions had to be handled through a functioning bank account. For the customer, the account-opening process was therefore not merely an ancillary administrative process. It formed part of the organizational infrastructure of the newly established company.

3.1 An Initially Clearly Structured Process

At the outset, Qonto described a structured company formation and account-opening process to the customer. This included the submission of certain formation documents, the payment of the share capital, and the subsequent submission of the application for entry in the Commercial Register.

As early as July 16, 2026, Qonto informed the customer that the payment of the share capital had been verified. At the same time, it explained which next step was required. A clearly identified upload channel was provided for submitting the application for entry in the Commercial Register.

This process step is of particular importance to the subsequent analysis. The communication fulfilled several functions simultaneously:



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- **A fact was communicated.**

The verification of the paid-in share capital had been completed.

- **The significance of this fact for the further process was apparent.**

The customer knew where he was within the formation process.

- **The next required step was identified.**

Following the corresponding register-related action, the application for entry in the Commercial Register was to be submitted.

- **A specific means of carrying out this action was provided.**

The required upload channel was identified.

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From the perspective of this case study, this created a communication chain that can be described as follows:

- **Information → significance → action → next process step**

The customer did not need to know Qonto's internal organization. He did not need to know which department would subsequently review the documents, which technical system was involved, or which internal work steps would then be triggered.

For his capacity to act, it was sufficient that he could recognize:

- **What has happened?**
- **What does this mean for me?**
- **What do I need to do next?**
- **How can I carry out this action?**

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This provides an important reference point for the subsequent analysis.



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3.2 A Positive Reference Within the Same System

The case study expressly does not use this early process step to assess Qonto positively or negatively as a whole. It serves a different function. It demonstrates that, within the same service under examination, communication was possible that immediately enabled the customer to understand and continue his part of the process.

This provides an internal basis for comparison. Subsequent communication problems therefore do not have to be assessed exclusively by comparison with other providers. In some instances, it is already possible to ask why communication that initially functioned clearly and in an action-oriented manner within the same process no longer exhibited these characteristics to the same extent at another point.

This comparison is methodologically particularly valuable because essential parameters remain the same:

- **It is the same customer, the same account opening, the same service, and the same overarching company formation process.**

Initially, only the specific communication situation differs. This makes it possible to examine the effects that different forms of information delivery within the same overall process had on the customer's capacity to act.

3.3 A Company Formation Process Involves Multiple Concurrent Dependencies

In assessing the subsequent course of events, it must also be taken into account that, from the founder's perspective, forming a company does not consist of a single process chain.



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Several processes run in parallel or are mutually dependent.

- **The company requires a business account.**
- **Capital must be paid in for certain formation steps.**
- **Steps relating to the Commercial Register, in turn, alter the company's status.**
- **Full usability of the account may itself depend on the submission or review of corresponding documents.**

At the same time, costs and obligations already arise during this phase. For the customer, this means that information within one individual process can affect several other processes.

From the customer's perspective, unclear information concerning account activation therefore does not affect only the operation of a banking application. It may affect whether payments can be made, obligations can be fulfilled, and the organizational formation process can continue.

This does not automatically increase the provider's responsibility for all of the company's activities. It does, however, explain why the quality and timing of process information may be of greater significance to the customer than would be apparent if an individual technical process step were considered in isolation.

3.4 Onboarding from the Provider's and Customer's Perspectives

From a provider's perspective, a digital onboarding process may consist of a defined sequence of individual verification steps. The customer, however, does not necessarily experience the same structure. He experiences his own overall process. Within that process, the notary appointment, payment of share capital, Commercial Register



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proceedings, bank account, invoices, contracts, and other organizational requirements may all be interconnected.

This gives rise to an important distinction for the case study:

- **The provider designs its process.**
- **The customer goes through his process.**

The two do not have to be identical. Good process communication therefore does not have to take over or manage every process outside the provider's own sphere of responsibility. It should, however, enable the customer to place the provider's own process step in context clearly enough to organize his adjacent tasks independently.

This gives rise to another criterion for the analysis:

- **Good onboarding does not merely reflect the provider's process – it must enable the customer to navigate the process he actually has to go through.**

This does not require the provider to anticipate every individual life or business situation. It merely requires, initially, that the provider's own part of the overall process remain recognizable to the customer.

3.5 Transition to the First Information Gap

Against this background in particular, the subsequent development is of interest to the case study. The communication of July 16, 2026 had established a clear relationship between status, significance, and the next action. As the process continued, however, the quality of the information apparent to the customer changed.



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On July 19, 2026, he was informed that “required additional information” concerning his organization and banking activities was still missing. At the same time, he was advised that this information was required for the full validation of the account and that failure to provide it within the specified deadline could result in the account being blocked. The message included a button labeled “Provide additional information.”

Several pieces of information were therefore available:

- **The customer knew that something was still missing.**
- **He knew that the missing information was required for the full validation of the account.**
- **He knew that failure to provide it could have consequences.**
- **And he was provided with a technical means of taking action.**

One decisive piece of information, however, remained unanswered in the communication concerned:

- **What specific additional information is missing?**

The previously recognizable communication chain therefore changed. What had been:

- **Information → significance → action → next process step**

now became:

- **Information about a need for action → possible consequence → technical means of taking action**

The specific content of the expected action, however, was not correspondingly clear from the message itself.



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This is where, for the first time, the distinction described in Chapter 2 as a criterion for analysis becomes apparent:

- **Technical operability does not automatically mean human capacity to act.**

The customer could press a button. From the message itself, however, he could not determine what specific information was expected of him.

- **It is precisely at this point that the actual analysis of the subsequent course of the process begins.**

4. From the First Information Gap to the Loss of Clear Process Guidance

With the message of July 19, 2026, the character of the process as it had been apparent to the customer up to that point changed. As described in Chapter 3, the previous step had been clearly structured: a status was communicated, its significance was recognizable, the next action was identified, and a specific means of carrying it out was provided.

The July 19 message likewise contained several pieces of information that were important to the customer. It informed him that “required additional information” concerning his organization and banking activities was still missing. At the same time, it stated that this information was required for the full validation of the account and that failure to provide it within the specified deadline could result in the account being blocked.

A button labeled “Provide additional information” was available for submitting the information.



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The following was therefore apparent to the customer:

- **Action was required.**
- **The action was relevant to the full validation of the account.**
- **Failure to act could have consequences.**
- **A technical means of taking action was available.**

What was not apparent with the same degree of specificity, however, was:

- **What additional information is missing?**

It is precisely this missing assignment that is significant for the further analysis.

4.1 Request for Action Without Fully Specifying the Required Action

A request for action does not fulfill its communicative function merely by prompting the recipient to act. The individual must also be able to recognize what is expected of them. In the present case, there was therefore a discrepancy between two different forms of capacity to act.

Technically, the customer was able to act. He could use the button provided. In substantive terms, however, his capacity to act was restricted by the message itself. He could not immediately determine from it which specific information Qonto expected him to provide.

The communication therefore answered the question:

- **“Do I need to do something?”**

It did not answer with the same clarity:

- **“What do I need to do?”**



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For the ICD, this initially gives rise to a factual question for QONTO SA:

- **What specific information was missing at that point, and why was it not directly identified to the customer in the request concerned?**

This question does not yet contain any assumption about the cause. The specific information may only have been displayed within the subsequent process step. There may have been technical, organizational, or regulatory reasons for the chosen design. This cannot be assessed from the external perspective.

For the communication effect under examination, the decisive point at this stage is only that the message itself did not fully specify the content of the action expected.

4.2 Additional Search as Part of the Actual Process

Such an information gap could be assessed solely by asking whether the customer could have obtained the missing information elsewhere in the system. For the purposes of this case study, however, that approach would be too narrow.

As established in Chapter 2, the information, search, and clarification effort required is itself part of the observed process effect. The question is therefore not merely:

- **“Was the information available somewhere?”**

but also:

- **“What additional steps did the customer have to take in order to determine what was expected of him?”**

As soon as a customer receives a request for action whose specific content he can determine only by opening additional sections, conducting research, asking follow-up



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questions, or interpreting information, these additional steps become part of his actual process experience. This does not automatically mean that a barrier has arisen. The additional step may be objectively necessary. It may, for example, be required because personal or confidential requirements can only be displayed after authentication, or because the specific requirements arise dynamically from a review process.

The ICD does not know whether such circumstances existed in the present case. The decisive question therefore once again concerns the origin of the obstacle:

- **Was the additional search necessary for the proper execution of the process, or could the required information have been communicated more directly without any loss of security, accuracy, or function?**

This question cannot be fully answered from the external perspective. The additional uncertainty that was observed can nevertheless be documented.

4.3 Significance of the Announced Consequence

The information gap gains additional significance because the message did not merely request a non-binding supplement. It established a connection to the full validation of the account and referred to the possibility of the account being blocked if the information was not provided within the specified deadline.

This creates a communicative asymmetry:

- **The possible consequence is specific.**
- **The required content of the action remains less specific.**



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For the individual, this combination in particular can be burdensome. He knows that inaction may have negative consequences, but cannot determine from the message concerned with the same degree of clarity what specific action is required in order to reliably avoid those consequences.

This increases the importance of precise process guidance.

The more significant an announced consequence is, the more important the clear relationship becomes between:

- **requirement → action → deadline → consequence**

At this point, the case study does not assess whether the announced blocking of the account was legally, regulatorily, or organizationally necessary.

The analysis concerns exclusively the communication of that relationship.

4.4 Neurodivergent Process Impact

For the author of this report, this situation has an additional dimension of impact due to his neurodivergence. The burden does not arise solely from the fact that a further process step is required.

Of particular significance is the combination of:

- **recognized pressure to act;**
- **a not fully recognizable content of the required action;**
- **a possible negative consequence; and**
- **the need for additional clarification.**

A clear next step makes planning possible. An unclear next step, by contrast, creates an additional need for decision-making and monitoring.



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For the neurodivergent author of this report in particular, such an open process situation can create considerable stress because the task cannot be completed, clearly classified, or reliably integrated into a predictable subsequent sequence.

Here again, the individual burden does not automatically establish the existence of a barrier. The burden is initially a documented effect. The analytical question remains:

- **What part of this burden resulted from the necessary complexity of the process – and what part may have arisen only from avoidable ambiguity in the communication?**

Neurodivergence therefore does not become the criterion for determining whether Qonto communicated “correctly” or “incorrectly.” Rather, it provides additional insight into the effect that a particular process design can have on a specific individual.

4.5 Entry in the Commercial Register and the Subsequent Information Situation

The company was entered in the Commercial Register on August 14, 2026. After receipt of the corresponding notification, the data and documents that the customer considered necessary were submitted through the channels provided by Qonto.

For the following analysis, it is less important which internal reviews were subsequently carried out within QONTO SA. These internal processes are not known to the ICD. What can instead be observed is which information concerning the further processing status was available to the customer.

From his perspective, the requirements known to him had been fulfilled or the requested documents had been submitted.



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During the subsequent course of the process, however, he could not identify sufficiently specific information indicating:

- **whether anything was still missing;**
- **which processing step was still outstanding;**
- **whether he needed to take action again; or**
- **whether he simply needed to wait for further processing.**

The distinction between:

- **“I need to act”**

and

- **“I need to wait”**

is particularly important for an individual's capacity to act. Waiting may be an entirely legitimate and necessary process state. A barrier does not arise merely because a process takes time.

Communication becomes problematic, rather, when the individual cannot determine with sufficient certainty whether waiting is the intended next step or whether some as yet unknown action on their part is still required.

4.6 No Statement About an Internal “Process Gap”

The ICD expressly does not describe this period as an internal “process gap.”

Such a description would presuppose knowledge of what actually occurred within QONTO SA's systems and organization. That is not the case.

Internally, the matter may have been reviewed, processed, forwarded, placed in a waiting state, or dependent on external information. The present case study does not have a sufficient basis for determining this.



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What can be established is only the following:

- **The internal course of events is not known to the ICD. Externally, however, the customer could not identify a sufficiently specific change in the communicated processing status over a period of time.**

This distinction is essential. An internally active process may appear communicatively static from the outside. Conversely, the absence of a visible status change does not permit the conclusion that nothing is happening internally.

The case study therefore examines not the internal activity, but the **process guidance apparent to the individual**.

4.7 From an Information Gap to a Need for Monitoring

As the period continued, the customer's task also changed. As long as a process is clearly guided, he can respond to communicated requirements. If, however, the information does not indicate whether any further action on his part is required, the customer must begin monitoring the process himself.

His role can therefore shift:

- **From being the user of a guided self-service process, he increasingly becomes a person who must independently check**
- **whether anything is missing;**
- **whether the status has changed or another message has arrived;**
- **whether a function has since been activated; and**
- **whether he himself needs to take further action.**



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This creates an additional form of work:

- **monitoring work**

It is not identical to the actual task the customer is supposed to perform within the process. Rather, it arises because the individual must first determine whether there is a task at all. This distinction will become increasingly important as the case study progresses.

4.8 Questions for QONTO SA

This section therefore gives rise to several questions that can only be answered from QONTO SA's internal perspective:

- **What specific additional information was missing on July 19, 2026?**
- **Why was this information not directly identified in the communication concerned?**
- **What processing steps actually took place after the company's entry in the Commercial Register and the submission of the documents that the customer considered necessary?**
- **What information was available to Qonto during this period that could have enabled it to indicate to the customer whether he needed to take further action or simply wait for further processing?**

These questions are not intended to anticipate the answers. Their purpose is to subsequently bring together the customer's documented external perspective and QONTO SA's internal perspective.



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4.9 Interim Conclusion

The course of events examined thus far shows two different forms of process communication within the same account-opening process.

At the outset, the relationship was clearly recognizable:

- **status → significance → action → next step**

With the request of July 19 and during the subsequent processing period, by contrast, a situation arose in which the customer knew that the process had not yet been completed but, for a period of time, could no longer determine with the same degree of certainty what was still expected of him or whether any further action was required at all.

The focus of the analysis therefore shifts. It is no longer exclusively concerned with the existence of individual pieces of information or functions. Increasingly, the question becomes:

- **Who guides the process – the system through clear information, or the customer through his own research, monitoring, and clarification?**

This question forms the transition to the subsequent course of events.

5. Escalation, Account Activation, and Process Impact

The uncertainty described in Chapter 4 regarding the subsequent processing status continued as the process progressed. The customer could not determine which internal reviews were being carried out, which processing steps were still outstanding, or whether



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further action was expected of him. As time passed, the situation therefore involved more than merely waiting.

An increasing need for clarification and monitoring arose. This distinction is essential to the case study. A process may take time without thereby becoming communicatively problematic. If the customer knows that his own part has been completed, that the matter is being processed, and that he does not need to take any further action until another message is received, even a longer processing period can constitute a clearly defined process state.

A waiting period has a different effect, however, when it remains unclear whether further action on the customer's part is still required. In that case, the customer does not merely have to wait.

He has to **monitor the waiting itself**.

5.1 Transition from Using the Process to Actively Seeking Clarification

After no sufficiently specific further process information was apparent to the customer, he attempted in early September 2026 to actively clarify the processing status. On September 2, he contacted support for this purpose. From the customer's perspective, the support process did not initially lead directly to a conclusive clarification. The inquiry was forwarded for further handling; an announced prompt contact did not result in a corresponding response within the period expected by the customer.

This again changed the customer's role. He was no longer merely responding to an account-opening process guided by Qonto. He began actively requesting that the process continue or seeking to determine its current status himself. What had been:

- **process information → customer action**



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increasingly became:

- **missing process information → customer initiative → attempt at clarification**

This change is relevant to the later assessment of the actual effort involved in self-service.

5.2 Formal Request for Clarification of September 3, 2026

On September 3, 2026, the customer therefore submitted a formal inquiry to Qonto. It essentially raised three specific questions:

- **Are any further documents or information required?**
- **If so, which specific documents or information are missing?**
- **If nothing further is required, when can full activation of the account be expected?**

The customer was thereby attempting to establish precisely the distinction that had not been sufficiently apparent to him during the preceding process:

- **Do I need to act – or do I need to wait?**

A case number was assigned to the inquiry. A human response was received later that same day stating that the matter had been taken up and forwarded. For the first time, it again became apparent to the customer that his specific need for clarification was being addressed within the support process.



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5.3 Notification of Validation

On the evening of September 3, 2026, the customer received notification that the account had been validated. At the same time, he was informed that the review of the application for entry in the Commercial Register had been completed. According to the information provided to the customer, Qonto itself would obtain an extract from the Commercial Register within the following 70 days.

Until then, the account was already largely usable; certain functions, particularly those related to SWIFT, were to become fully available only after this further step. In communicative terms, this message differed significantly from the preceding situation.

The customer once again received information about:

- **the status;**
- **the process step that was still outstanding;**
- **responsibility for that process step; and**
- **the effects on use of the account.**

Of particular significance was the information that Qonto itself was responsible for obtaining the still-outstanding Commercial Register extract.

This answered the question:

- **“Do I still need to do anything?”**

for this process step.

The customer could recognize that the next action was not his responsibility. A substantial part of his previous uncertainty was therefore removed.



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5.4 Full Activation the Following Day

As early as September 4, 2026, the customer was informed that the Commercial Register extract had been obtained and that the account was now fully activated. Approximately 20 hours therefore elapsed between the notification that the extract would be obtained within a period of up to 70 days and the actual full activation of the account.

This temporal proximity is noteworthy for the case study. It does not, however, permit the retrospective conclusion that the preceding processing period or the stated possible period of up to 70 days had been unnecessary.

The ICD does not know the internal processes involved. In particular, it is not known:

- **which reviews had previously been required;**
- **which prerequisites had to be met before the extract could be obtained;**
- **whether the preceding escalation had any influence on the processing;**
- **whether the rapid completion merely coincided with it; or**
- **which internal or external dependencies existed.**

No corresponding causal relationship is therefore asserted.

Only the chronological sequence can be established.

5.5 Retrospective Assessment and the Decision to Act at the Time

At this point in particular, two perspectives must be distinguished. In retrospect, we know that full activation occurred the following day. The customer, however, could not know this on September 3. His decisions had to be made on the basis of the information available to him at that time.



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This is of fundamental importance to the assessment of the overall course of the case. An action may retrospectively prove to have been unnecessary and nevertheless have been entirely understandable at the time it was taken.

This gives rise to an important principle for the analysis:

- **Unnecessary in retrospect does not mean unnecessary at the time.**

This principle applies in particular to research, monitoring, follow-up questions, and escalation. If, on the basis of the information available to him, the customer cannot recognize that a problem is close to being resolved, the knowledge acquired only later cannot be attributed to him when assessing his earlier decision.

The case study therefore does not assess the effort required solely on the basis of the outcome known afterward. It examines what information was actually available to the individual at the relevant point in time when the decision had to be made.

5.6 Functional Resolution and Communicative Process Impact

With the full activation of the account, the original functional problem was initially resolved.

The business account was usable.

This does not, however, automatically end the analysis of the process impact.

A technical or functional resolution answers the question:

- **“Does it work now?”**

The case study additionally examines:

- **“What path was required in order for it to work?”**



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These two questions must not be confused.

A process that is ultimately completed successfully may nevertheless have generated substantial information, monitoring, or clarification effort beforehand. Conversely, such effort does not automatically mean that the entire process was poor or unlawful. It is initially an observable component of the actual course of the process.

For the analysis, therefore, not only the final outcome is relevant, but also the path taken to reach it.

5.7 Escalation as Part of the Actual Process

Methodologically, the escalation must likewise not be considered separately from the process. From a technical perspective, the actual account opening and the subsequent support inquiry could be treated as two separate processes.

From the customer's perspective, however, they belong together. The customer contacted support because he was unable to sufficiently clarify the status of the account-opening process. The support process therefore functionally becomes part of the overall process actually experienced by the customer. This is particularly relevant to the later analysis of digital self-service services.

If a self-service process regularly has to be supplemented by additional research, support contacts, or escalations, those activities are also part of the actual effort required to use it. This does not mean that every support contact proves a defect in the original process. Support may be a useful and necessary part of a system.

The decisive question is instead:



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- **Why was support required, and did it effectively reduce the need for clarification that had arisen?**

5.8 Restoration of the Capacity to Act

The communications of September 3 and 4 substantially changed the situation for the customer. He now knew:

- **that validation had been completed;**
- **which further step was still outstanding;**
- **who was responsible for carrying out that step;**
- **what restriction remained until then; and**
- **ultimately, that the process had been completed.**

Thus, it was not merely a technical function that had been activated. The customer's previously restricted **informational capacity to act** was also restored. He no longer had to determine the status of this part of the process himself.

This difference retrospectively confirms the reference criterion established in Chapter 3:

information → significance → action or deliberate waiting → next process step

Waiting, too, can therefore constitute an unambiguous form of action in a broader sense — **if the individual knows that waiting is what is required.**

5.9 No Legal Assessment Based Solely on Process Duration

The documented duration, the additional need for clarification, and the required customer initiative are examined in this case study as process effects. At this point, no violation of a legal norm is derived from them. A lengthy processing period, or one experienced as burdensome, is no more inherently a legal violation than a cumbersome process.



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A legal assessment would become appropriate only if a specifically applicable legal provision imposed particular requirements regarding deadlines, information, decisions, or procedural design and the conditions of that provision were met by the documented facts. No such finding is made for the section examined here.

The criticism therefore remains at the level supported by the documented facts:

- **process guidance;**
- **information quality;**
- **capacity to act; and**
- **the resulting clarification effort.**

5.10 Questions for QONTO SA

For the purpose of bringing the external and internal perspectives together, this section gives rise in particular to the following questions:

- ▶ **What internal processing steps took place between the submission of the documents considered necessary by the customer and the validation of the account on September 3, 2026?**
- ▶ **Was it already apparent at an earlier stage that no further documents or actions were required from the customer?**
- ▶ **What significance did the period of up to 70 days communicated on September 3 have for obtaining the Commercial Register extract?**
- ▶ **What circumstances made it possible for this step actually to be completed within approximately 20 hours?**



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- Did the preceding support inquiry or escalation influence the timing of the processing?

The final question is deliberately formulated as a question. The temporal proximity between the escalation and full activation can be documented. A causal relationship inferred from that proximity, however, would be speculative without QONTO SA's internal perspective.

5.11 Interim Conclusion

The process examined ultimately resulted in a functioning and fully activated business account. The functional resolution can therefore be clearly established. It can equally be established, however, that before this resolution the customer had to expend additional information, monitoring, and clarification effort over a period of time because it was not sufficiently clear to him whether further action was required and, if so, what that action was.

The subsequent rapid resolution removed the functional disadvantage. It does not retrospectively eliminate the effort that had actually arisen beforehand.

This brings another criterion for analysis into focus:

- **The quality of a digital process is not measured exclusively by whether it is ultimately completed successfully. Consideration must also be given to what share of producing that success had to be borne by the process itself and what share by the individual.**

With the full activation of the account, one phase of the case study therefore ends.

The next begins with the use of the now functioning business account.



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6. Use of the Fully Activated Account

With the full activation of the account on September 4, 2026, the account-opening process was functionally complete. At the same time, the focus of the observation changed. Up to this point, the primary question had been what information the customer needed in order to understand the formation and activation process and carry out the actions required at each stage. Regular use of the business account now began.

This brought another form of communication between system and individual to the forefront:

- **status information.**

In a digital self-service system, status indicators perform an essential communicative function. They inform the individual about what the system has recognized or processed, the state of a process, and whether any further action is required. The status itself thus becomes a form of process communication.

6.1 From a Request for Action to System Feedback

During the account-opening process, the central question was often:

- **“What do I need to do next?”**

During regular use, another question arises:

- **“Has the system processed my action in such a way that I do not need to do anything further?”**



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This distinction may initially appear minor, but it is of considerable significance to the individual's capacity to act.

A customer may correctly carry out a required action and still remain uncertain about what to do if the subsequent system feedback does not clearly indicate whether the task has thereby been completed. This creates a new communication chain:

- **requirement → human action → system processing → feedback → completion or further action**

Only the feedback completes the process from the individual's perspective.

6.2 Missing Receipts as a Concrete Example

When using the now fully activated business account, Qonto indicated for individual transactions that receipts or supporting documents were missing. Such an indication initially performs a useful function. It alerts the customer to a condition that may require action. The customer can recognize:

- **According to the apparent system status, a receipt is missing for a transaction.**

This creates a specific task. The customer can assign or upload the corresponding receipt. For the case study, however, the subsequent state becomes particularly interesting. After uploading a receipt, it was not always immediately clear to the customer whether the previously indicated requirement had thereby been fully resolved.

The question therefore shifts.



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No longer:

- “Can I upload a receipt?”

but rather:

- “Can I recognize whether my receipt has been successfully assigned and the task has thereby been completed?”

6.3 Technical Execution and Recognizable Completion

Here again, the distinction developed in the preceding chapters between technical operability and human capacity to act becomes apparent. Technically, an upload may have been completed successfully.

For the individual, however, it is additionally necessary to be able to interpret the resulting state. Clear process feedback could, for example, indicate:

- **Receipt missing.**
- **Receipt uploaded.**
- **Receipt assigned.**
- **No further action required.**

Whether a system needs to use precisely these terms, or even requires such a multistage representation at all, is a matter of design and is not something prescribed by the ICD.

The decisive factor is the communicative function:

The individual must be able to recognize whether their task has been completed.



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If this clarity is absent, a need for monitoring arises again after an action has been technically completed.

6.4 Different Status Information and Its Significance

Status indicators have reliable informational value only if the individual can recognize their significance within the relevant process context. Terms such as:

- “missing,”
- “uploaded,”
- “being processed,”
- “assigned,”
- or “completed”

describe different process states.

What matters is not that a system use precisely this terminology. What matters is whether different system states are presented to the individual in such a way that they can derive the correct consequence from them.

The essential question is therefore:

- **Does the displayed status merely describe the internal state of an object
– or does it also provide sufficient information about what that state
means for the individual?**

A status may be technically correct and nevertheless create an additional need for interpretation.



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It is precisely at this point that the distinction developed in Chapter 2 becomes relevant again:

- **Available information is not automatically information that enables action.**

6.5 The Importance of Context

An additional difficulty can arise when information concerning the same process appears in different parts of the system or when its meaning depends on the particular context. A help text may be factually correct when considered on its own. A status indicator may likewise be factually correct.

An upload may also function correctly from a technical perspective. For the individual, however, these elements create a clear overall process only if they are connected to one another in an understandable way.

The case study therefore does not examine merely the accuracy of individual texts or functions.

It examines how they work together:

- **What does the status indicate?**
- **What does the help information explain?**
- **What action does the system enable?**
- **And what feedback does the individual subsequently receive?**

If these elements allow different interpretations, an additional need for clarification arises even though each individual element may function correctly when considered in isolation.



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6.6 Help at the Point Where Information Is Needed

Particularly in digital self-service systems, it is therefore not only the existence of a help function that is relevant. Where and when it becomes available also matters. A detailed explanation in a general help section may be valuable. If, however, the customer is already engaged in a specific process, the need for information arises precisely at that point.

This gives particular significance to a form of contextual assistance:

- **Information where the question arises.**

This does not mean that every conceivable explanation would have to be displayed directly on every user interface. Too much information can itself impair clarity and comprehensibility.

The design task therefore does not consist of providing the maximum amount of information, but of assigning information meaningfully:

- **What information does the individual need at what point in order to continue acting independently?**

This brings us back to our accessibility criterion:

- **The simplest interface is not necessarily the one with the least information.**

If necessary information is removed through excessive reduction or relocated to another place that is difficult to identify, simplification itself can create additional search effort.



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6.7 From a One-Time Need for Monitoring to Process Burden

A single unclear status indicator is initially of limited significance. The customer may check again, open another section, or search for additional information. For the case study, however, such an occurrence becomes particularly relevant when similar situations arise repeatedly. This is because monitoring effort is cumulative.

From the individual question:

- **“Has this process been completed?”**

repeated experience can give rise to a more fundamental expectation:

- **“Do I need to check whether the system has actually done what I expected it to do as a result of my action?”**

This changes the way a self-service system is used.

The individual no longer merely performs the actual task. They additionally monitor its processing. The **monitoring work** identified in Chapter 4 thus continues during regular use. This is significant for the later assessment of the actual efficiency of the digital service.

6.8 Paid Service and Distribution of Effort

In assessing this additional monitoring effort, it must be taken into account that the customer does not receive the account functions under examination as optional additional services or as a free benefit. They form part of a paid digital service. This fact does not in itself establish an entitlement to a completely disruption-free process, nor does every additional work step give rise to a legal objection.



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It is, however, relevant to the assessment of actual process quality and economic efficiency. The customer does not pay merely for the technical existence of individual functions. He purchases a service whose value to him is also measured by the extent to which it reliably supports the tasks associated with managing the account. If, in addition to actually using the service, the customer repeatedly has to check whether completed actions have been processed, whether status indicators have been interpreted correctly, or whether further steps are required, additional work arises for the customer.

This effort is not economically neutral. Although it is not invoiced by the provider, it must nevertheless be performed by the customer himself. This gives rise to another question for the subsequent analysis:

- **What share of the work required to use the service is performed by the digital system – and what share must additionally be performed by the paying customer?**

The point is not to regard self-service in itself as an improper transfer of work. A digital business account is based precisely on the customer carrying out certain processes independently. The decisive question is instead which work forms part of the intended use and which additional work arises only because the customer has to research, monitor, or clarify process states.

Two forms of customer effort can therefore be distinguished:

- **usage effort** arises from the intended use of the purchased service;
- **additional monitoring and clarification effort** arises where the customer, beyond that intended use, must independently determine whether the service has produced the expected process state.



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This distinction is essential to the case study. From the customer's perspective, the actual performance of a digital self-service service cannot be assessed solely on the basis of its price or its technical range of functions. The customer's own effort required to actually use the paid service must also be taken into account.

6.9 Neurodivergent Impact

For the neurodivergent author of this report, this form of status uncertainty also has a particular impact. A process that has clearly been completed can be mentally closed and removed from the current focus of work. A process whose completion remains unclear, by contrast, remains open. It may require renewed checking, remembering, and attention. The burden therefore does not necessarily arise from the difficulty of the actual task — for example, uploading a receipt — but from uncertainty about its completion.

Here again, the methodological criterion already established applies:

- **This individual impact does not in itself prove the existence of a barrier or a legal violation.**
- **It does, however, make visible the additional cognitive burden that ambiguous system feedback can create for the specific individual.**

The subsequent analysis therefore again asks whether the situation was avoidable:

- **Was the existing ambiguity objectively necessary, or could the state of completion have been communicated more clearly with reasonable effort?**



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6.10 No Equating With a Legal Violation

The questions concerning status and assignment described in this chapter are examined as matters of communication and process quality. No legal violation is derived from them. In particular, an unclear or cumbersome status display, or one requiring additional monitoring, does not in itself constitute a violation of an accessibility provision or any other legal norm.

As established in Chapter 1, such a legal assessment would require a specifically applicable legal provision to apply to the matter under examination and its legal requirements to be satisfied. No such finding is made here.

The finding remains more precise:

A technically possible action was not, in every observed case, accompanied by equally clear feedback to the customer confirming its successful completion.

6.11 Questions for QONTO SA

For the purpose of bringing together the external and internal perspectives, the following questions arise in particular:

- ▶ **What different status states does Qonto provide for missing, uploaded, and assigned receipts?**
- ▶ **How is a customer intended to recognize that an uploaded receipt has been successfully processed or assigned to the relevant transaction?**



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- Under what circumstances can an indication remain visible after an upload that, from the customer's perspective, suggests that a receipt is still missing or unresolved?
- What function do the respective status indicators have from QONTO SA's perspective: do they exclusively describe a system state, or are they also intended to indicate whether action is required from the customer?
- What contextual assistance is available to the customer at this point if the meaning of the status indicator or the action required is not clear?

These questions do not presuppose any particular internal cause. Their purpose is to clarify how the observed external perspective relates to QONTO SA's actual process logic.

6.12 Interim Conclusion

With the full activation of the business account, the question of capacity to act does not disappear. It merely changes form.

During onboarding, the customer primarily had to recognize what action was required next. During regular use, he must additionally be able to recognize whether an action already performed has actually produced the expected state. Our process chain therefore expands:

- **information → significance → action → system processing → feedback → completion**

If clear feedback is absent, the process remains open from the individual's perspective — even if it may already have been completed technically.



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This reveals another characteristic of good digital process communication:

A system must not only tell the individual what to do. It must also enable them to recognize when they are finished.

This question becomes even more significant in the next section, where the issue is no longer merely the status of an individual transaction, but the fundamental availability of a banking function.

7. SEPA Direct Debit and the Capacity to Act

As use of the account continued, an additional subject of analysis emerged in connection with SEPA direct debit. The customer could see that direct debits, or the corresponding function, were “currently unavailable.”

This differed from the status questions examined previously. In the case of a missing receipt, there was in principle a recognizable task, although its completion might subsequently not have been clearly visible.

With SEPA direct debit, however, a prior question arose:

- **Why is the function unavailable – and what must happen for it to become available?**

The communication therefore no longer concerned merely the status of an individual process. It concerned access to a function of the business account.



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7.1 “Currently Unavailable” Describes a State

The information that a function is “currently unavailable” may be entirely factually correct. It initially describes a present state. For the individual’s capacity to act, however, it does not necessarily answer the questions that follow from that state:

- **Why is the function currently unavailable?**
- **Is the unavailability temporary or permanent?**
- **Does activation depend on an action by the customer?**
- **If so, what action is required?**
- **If not, does the customer simply need to wait?**

This brings us again to the distinction developed in the preceding chapters:

- **Information about a state is not automatically information about action.**

The statement:

- **“This function is currently unavailable”**

initially answers:

- **“What is the current state?”**

For the customer, an additional question is relevant:

- **“What does this state mean for what I need to do next?”**



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7.2 Prerequisite and Activation

This case study does not object in principle to certain banking functions not being immediately available or not being available under identical conditions for every account. A financial services provider may impose factual, technical, contractual, or regulatory prerequisites for certain functions. Whether such prerequisites existed in the specific case, and what they were, cannot be fully assessed from the external perspective.

The analysis therefore begins at a different point. If use of a function depends on certain prerequisites, the question from the customer's perspective is whether those prerequisites are communicated in such a way that he can recognize his own influence on the process.

The essential distinction is again:

- **Can I do something?**

or

- **Do I need to wait?**

An unavailable function can be entirely manageable for the customer if he can recognize:

- **which prerequisite is still missing;**
- **whether he can fulfill it himself;**
- **how he can fulfill it; and**
- **what happens afterward.**

Uncertainty arises, by contrast, when only the state is visible, but not the path by which that state can be changed.



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7.3 The Creditor Identifier as Part of the Information Need

In connection with SEPA direct debits, the creditor identifier plays a role for the payee. For the purposes of this case study, however, it is less important to describe the general rules governing the SEPA Direct Debit scheme in the abstract. What matters instead is the significance this prerequisite had within the specific Qonto process and whether that significance was recognizable to the customer at the point where the information was needed.

A customer may know that a creditor identifier exists without automatically being able to determine:

- **whether Qonto requires it for the function concerned;**
- **whether it can already be entered;**
- **where it must be entered;**
- **whether additional prerequisites exist; and**
- **whether entering it results directly in activation.**

This again illustrates the distinction between general knowledge and process knowledge. General knowledge answers:

- **“How does SEPA direct debit work in principle?”**

Process knowledge answers:

- **“What do I need to do within this specific system in order to use this function?”**

For the customer’s capacity to act, the second form of information is particularly decisive.



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7.4 Available Information and Information at the Point of Need

Information about the prerequisites for an account function can be provided in different places:

- **in contractual documents;**
- **in a help section;**
- **in general explanations;**
- **within a settings section; or**
- **directly at the unavailable function.**

These options are not communicatively equivalent. The fact that information can in principle be found does not yet answer the question of how much effort the customer must expend in order to connect it with the specific problem at hand.

For a self-service process, the assignment of information to the moment when action is required is therefore of particular importance. When the customer encounters an unavailable function, the need for information arises at precisely that point.

An explanation directly associated with that function could, for example, fulfill the following communicative function:

- **function currently unavailable → reason or prerequisite → required action or waiting state → further process**

This would not necessarily provide more information. It would simply connect the existing information more closely to the specific process state.



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7.5 Self-Service Requires Process Knowledge

This situation illustrates a particular feature of digital self-service services.

In a process supported by an employee, the customer can ask:

- **“Why can’t I do this?”**

The employee can interpret the situation and, if necessary, explain what is required.

In self-service, part of this explanatory function must be performed by the system itself.

This does not mean that a digital system must anticipate or answer every conceivable question. It does mean, however:

- **The more strongly a process is designed for independent use, the more important the system’s ability becomes to explain its own state to the individual in an understandable way.**

Self-service therefore does not reduce the importance of communication.

It merely changes who or what carries that communication. Where an employee could previously explain a process, the user interface, status information, help system, and, where necessary, support must now work together to ensure that the customer retains the capacity to act.

7.6 The Function Is Part of a Paid Service

In assessing the information and clarification effort involved, the economic context already developed in Chapter 6 must also be taken into account. The customer does not use the business account as a free service. He pays for a service that includes certain functions and possibilities for use.



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Where a specific function forms part of the purchased scope of service, the question of its usability therefore has a different significance than in the case of an optional additional service or a free benefit.

This does not mean that every function must always be available without prerequisites. Nor does it follow that a temporary restriction automatically constitutes a defect or a legal violation. It does mean, however, that the effort the customer must expend in order to actually use the purchased function forms part of the economic assessment of that service.

If the customer must first independently research:

- **why the function is unavailable;**
- **which prerequisite is missing;**
- **where that prerequisite can be fulfilled; and**
- **when the function will subsequently become available,**

additional work arises.

This effort does not appear in the account price stated on the invoice. It nevertheless forms part of the actual cost of use because it consumes the customer's working time and attention.

7.7 Usage Work and Clarification Work

The distinction introduced in Chapter 6 can therefore be further refined.

Usage work is the work that the customer is expected to perform as part of the intended use of the service.



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In the case of a SEPA direct debit, this may include, for example, entering required data, managing a mandate, or providing a required authorization or identification.

Clarification work, by contrast, arises when the customer must first determine which of these actions is required at all. This distinction is essential to digital efficiency. A self-service system may of course require work from the customer. That is part of its operating principle.

The decisive question is not:

- **“Does the customer have to do something?”**

but rather:

**“Does the system support the customer in carrying out the intended work
– or must the customer additionally work out how the system itself
functions?”**

This makes the boundary between self-service and additional process work visible.

7.8 An Unavailable Function Creates Consequential Effects

The unavailability of an account function also has a different quality from an isolated ambiguity within the user interface. If a function required for business purposes cannot be used, the customer may have to resort to alternative procedures.

This may create additional work steps.

For the case study, therefore, the relevant question is not merely the technical one of whether the function was available. The organizational consequences of its unavailability for the customer must also be considered.

Here again, however, our methodological limitation applies:

- **Such a consequential effect proves neither an error nor a legal violation.**



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It initially describes the effect of the process state on the specific user.

7.9 Accessibility and Avoidability

The SEPA observation can also be examined using the accessibility criterion developed in Chapters 1 and 2 without automatically deriving a legal conclusion from it. The mere fact that a function has prerequisites does not constitute a barrier. Nor is a complex prerequisite a barrier merely because fulfilling it requires effort.

The decisive question is instead:

- **What effort is objectively required by the function and its necessary prerequisites – and what additional effort may arise only from the way those prerequisites are communicated?**

If a prerequisite is necessary, accessibility cannot remove it. If, however, information about that prerequisite is avoidably difficult to find, not clearly assigned, or communicated incompletely, a different question arises.

Our criterion therefore remains consistent:

- **The necessary prerequisite itself is not the subject of criticism; the issue is a potentially avoidable obstacle on the way to understanding and fulfilling it.**

7.10 No Finding of a Legal Violation

No legal violation is derived at this point from the documented unavailability of the SEPA Direct Debit function and the associated need for information. In particular, it is not



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asserted that the customer had an unconditional legal entitlement to the immediate availability of this specific function.

Such a finding would first require examination of the precise contractual scope of service, the applicable terms and conditions, and, where relevant, regulatory requirements. That is not initially necessary for the communication analysis conducted here.

The identifiable subject of analysis is narrower:

- **A function of the account relevant to the customer's business use was unavailable. The decisive question for his capacity to act was therefore whether the communication enabled him to recognize why this was the case and what, if anything, was required in order to change that state.**

If subsequent legal analysis were to show that specific contractual or statutory information or performance obligations were directly affected, that legal dimension would have to be examined separately. It is not anticipated here.

7.11 Questions for QONTO SA

The following questions arise in particular from this section of the process:

- **What specific prerequisites applied at the time under examination to use of the SEPA Direct Debit function?**
- **Which of those prerequisites had not yet been fulfilled in the specific case?**
- **What role did a creditor identifier play in this context?**



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- ▶ **At what point was the customer informed which prerequisite for activation was still missing?**
- ▶ **Could the customer fulfill the required prerequisite himself, or was further processing by Qonto required?**
- ▶ **How was the customer supposed to recognize whether he needed to act or merely wait for further activation?**
- ▶ **What information does Qonto provide directly at the unavailable function to explain this relationship?**

Again, these questions are not requests for the company to justify itself. Their purpose is to bring together the process design apparent from the customer's perspective and QONTO SA's internal perspective.

7.12 Interim Conclusion

The observation concerning SEPA direct debit expands the subject of the analysis so far. During account opening, the question was:

- **“What do I need to do?”**

With subsequent status indicators:

- **“Has my action been completed?”**

With an unavailable function, the question now becomes:

- **“Why can't I use this function – and what must happen before I can use it?”**



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This once again demonstrates that technical functionality and human capacity to act operate on different levels. A system can technically and correctly display:

- **“Currently unavailable.”**

For the individual, however, the actual information often begins only with the next question:

“Why – and what does that mean for me?”

For a paid self-service service, this question takes on additional significance. The customer pays to use the service while at the same time performing an intended share of the operational work himself. Analytically, therefore, a distinction must be made between the work that forms part of using the service and the additional work required merely to determine how the purchased service can be used.

This increasingly leads the analysis to an overarching question:

- **How much work does a digital process actually take away from the individual – and how much work does it merely shift onto them?**

8. Physical Bank Cards: System Status and Human Expectation

As use of the account continued, an additional information issue emerged in connection with the bank cards associated with the business account.

In the digital system, the cards were displayed with the status “Active.” From a technical perspective, this status may be entirely unambiguous. It may, for example, indicate that a card has been created in the system, assigned to the account, and generally enabled for certain functions.



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For the customer, however, an additional question arose:

What does this digital status mean for the physical bank card?

In particular, it was not immediately apparent to him:

- **whether the physical card had already been produced;**
- **whether it had already been shipped;**
- **when it had been shipped; or**
- **when it could be expected to arrive.**

This once again reveals the distinction observed in the preceding chapters between a technically described system state and the significance of that state for the individual.

8.1 “Active” May Be Technically Correct and Communicatively Incomplete

The case study does not question whether the designation “Active” may correctly describe the displayed technical status of the card. The decisive question is instead which question this status answers.

“Active” may, for example, mean: The card is activated within the system.

This does not, however, answer: **Where is the physical card?**

These two pieces of information concern different levels of the same object:

- **The first describes a digital functional status.**



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- **The second describes a physical process status.**

For the system, these two levels may be independent of one another. For the customer, however, they belong together because he ultimately wants to receive and use the physical card. This gives rise to an important analytical distinction:

- **functional status $\neq$ delivery status**

8.2 Different Questions Require Different Status Information

A status has meaning only in relation to the question it is intended to answer. The indication “Active” may answer:

- **“Is this card set up in my account or technically usable?”**

It does not necessarily answer:

- **“Has my physical card already been shipped?”**

or:

- **“When will it arrive?”**

From the perspective of the case study, this does not necessarily mean that incorrect information was provided. The issue is instead that existing information may have to be used to answer a different question from the one currently concerning the customer.

This creates **interpretive work**. The individual must independently determine what the displayed status means — and what it does not mean.



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8.3 Digital Object and Physical Object

This situation illustrates a particular feature of digitally managed services.

Within the application, the bank card appears as a digital object. That object has status information, settings, and functions. At the same time, a physical card exists that must be produced, shipped, transported, and delivered.

From the customer's perspective, both objects represent the same bank card.

From a process perspective, however, they may be in different states.

For example, the digital card status may already be "Active" while the physical shipping process has not yet been completed.

This does not mean that the system is functioning incorrectly. It does, however, create a communicative requirement:

The different states must remain distinguishable to the individual whenever they have different consequences for what the individual needs to do.

8.4 Act or Wait?

The physical card therefore brings us back to our central process question:

- **Do I need to act – or do I need to wait?**

If a card is displayed as "Active" but the physical card has not yet arrived, several explanations may be conceivable from the customer's perspective:

- **The card may not yet have been shipped.**

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- It may be in transit.
- Delivery may be delayed.
- It may already be considered delivered.
- Or further action by the customer may be required.

The case study does not claim that these possibilities actually existed in the specific case. They merely illustrate why a clear delivery status fulfills a different communicative function from a technical card status.

An understandable process should enable the customer to distinguish between:

- **The card is functional within the system.**

and

- **The physical card is at a particular stage of the delivery process.**

8.5 Waiting Is a Legitimate Process State

This example again demonstrates that capacity to act does not mean constantly being able or required to do something. Waiting can also be an entirely intended process state. If, for example, the customer is clearly informed:

“Your card has been shipped. No further action is required.”

he retains the capacity to act even though he cannot influence the subsequent transportation process.

- **He knows what is happening.**
- **He knows what it means for him.**
- **And he knows that he does not currently need to do anything.**



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This demonstrates:

- **Capacity to act does not consist only in the ability to take action. It also consists in the ability to recognize when no action of one's own is required.**

Particularly in physical processes that take place outside the customer's immediate control, this form of information is especially important.

8.6 Expectation Management Instead of Maximum Information

This observation does not imply that a provider would have to display every individual logistical intermediate step.

The case study does not demand seamless shipment tracking and does not prescribe any particular technical solution. The decisive question is instead what information is required to enable the individual to appropriately interpret the process state. Depending on the process, a very small amount of information may already be sufficient. What matters is not the quantity, but its function.

A sentence such as:

- **“Your physical card has not yet been shipped.”**

performs a different function from:

- **“Your card is active.”**



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Likewise:

- **“Your card has been shipped.”**

differs from:

- **“Your card is active.”**

None of these pieces of information necessarily replaces the other. This confirms a principle already developed in Chapter 2:

- **Accessible communication, or communication that enables action, does not mean providing as much information as possible. It means providing the right information at the right point in the process.**

8.7 Paid Service and Customer Expectation

The bank card must also be considered within the context of the account service purchased by the customer for a fee. The physical bank card forms part of the scope of service included in the selected account plan.

It is therefore not an optional additional service or a benefit provided free of charge, but part of the service purchased by the customer. The customer purchased a service whose agreed scope includes corresponding features. Again, this does not mean that every delay or every missing status indication automatically constitutes a contractual or legal violation.

For the economic and communicative assessment, however, the distinction remains significant. The customer is not waiting for an optional extra. He is waiting for a component of the service he has purchased.



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The question:

- **“When and how can I actually use the service I have paid for?”**

therefore has legitimate significance within the customer relationship. The more effort the customer himself must expend in order to determine the status of that service, the more strongly that effort becomes part of the actual experience of using the service.

8.8 The Boundary Between Necessary Waiting and Avoidable Uncertainty

Here again, two different forms of burden must be distinguished. Necessary waiting may result from production, shipping, logistics, or other objectively required process steps. Such time does not constitute a barrier or process failure merely because the customer experiences it as inconvenient.

Avoidable uncertainty, by contrast, may arise when the customer cannot determine during that time the basic state of the process that is relevant to him. The case study therefore does not ask:

- **“Why did the customer have to wait?”**

where the actual cause of the waiting is unknown.

Instead, it asks:

- **“What information was available to the customer to enable him to understand and classify that waiting?”**

The analysis thus remains consistently focused on the observable external perspective.



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8.9 No Finding of a Legal Violation

No legal violation is derived from this situation either. The display of a technical card status without simultaneously providing a physical delivery status does not, in itself, constitute an established violation of a legal norm.

Likewise, a particular delivery period would not be unlawful merely because it is inconvenient or organizationally disadvantageous for the customer. A legal assessment would only become necessary if, for example, specific contractual delivery commitments, statutory information obligations, or other directly applicable requirements were affected. No such finding is made on the basis of the facts examined here.

The finding therefore remains at the level of process communication:

- **The displayed status recognizably described a state of the card for the customer, but left unanswered the separate question of the status of its physical provision or delivery.**

8.10 Questions for QONTO SA

The following questions arise in particular from this section:

- **What precisely does the status “Active” mean for a bank card within the Qonto system?**
- **Does this status refer exclusively to the technical or functional state of the card, or does it also encompass parts of the physical provisioning process?**



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- **What status information is available to the customer concerning production, shipping, and, where applicable, delivery of the physical card?**
- **From what point can the customer recognize that a physical card has actually been shipped?**
- **How is the customer intended to recognize, if the card does not arrive for an extended period, whether action on his part is required or whether he should simply continue waiting?**

Again, these questions are not intended to anticipate any internal cause. Their purpose is to clarify the significance of the status information visible to the customer within QONTO SA's actual process logic.

8.11 Interim Conclusion

The observation concerning the physical bank cards expands the analysis by another form of digital process communication. A digital system can display a technically correct state and still leave another question relevant to the individual unanswered.

This gives rise to the distinction:

- **system status → What is technically the case?**

and

- **process status → What is happening with my service, and what does that mean for me?**

The two may be connected, but they are not identical. For human capacity to act, it is not necessary to know every internal process step.



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What is necessary is to be able to recognize the state that is relevant to one's own decision. In the case of the physical bank card, that decision can be expressed in its simplest form as:

- **Do I need to do something – or can I trust that the process will continue without any action on my part?**

This relatively small example therefore illustrates a broader relationship. For the subsequent course of the case study, however, delivery of the card is of only limited significance.

Shortly after the card was requested, other events unrelated to the card delivery led to the customer's decision to end the business relationship. The still-outstanding delivery of the physical bank card was neither the cause of that decision nor the subject of a separate complaint. The subsequent course of the delivery process could therefore no longer be meaningfully observed.

9. Fees, Value-Added Tax, and Information

With the full use of the business account, a transaction with an immediate financial effect arose for the first time within the business relationship under examination. An annual fee of EUR 124.38 was charged for the selected account plan. The corresponding invoice shows a net amount of EUR 103.65 and EUR 20.73 in French value-added tax at a rate of 20 percent. The stated service period is August 16, 2026 through July 31, 2027.

At the time the invoice was issued, the newly established ICD – Institute for Communication & Dignity gUG (haftungsbeschränkt) did not yet have a German VAT identification number.



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During the subsequent clarification process, Qonto explained that, for business customers with a valid European VAT identification number on file at the time the invoice is issued, the reverse-charge mechanism is generally applied. Without such a number on file, French VAT is charged. A VAT identification number could be entered for future invoices. For the invoice already issued, however, the customer was informed that it could not be corrected. This introduced a new subject of analysis. Unlike a mere status indication, the information communicated here had an immediate economic significance for the customer.

9.1 The Invoice as the Economic Consequence of a Process

An invoice is initially the result of a billing process. For the customer, this process becomes visible essentially only through its result:

- **service → billing → invoice amount → payment or charge**

The conditions according to which VAT is or is not charged within that process, by contrast, largely form part of the provider's internal process logic. The customer does not need to know this internal logic. He must, however, receive the information necessary whenever his own actions can influence the economic outcome. It is precisely at this point that the VAT identification number that was not yet available becomes relevant.

9.2 A Newly Established Company Is in a Transitional Phase

At the time of the process under examination, ICD gUG was still in its formation phase or immediate post-formation phase. Various characteristics typical of a fully established company do not necessarily arise simultaneously during this phase. A company may already have been formed and entered in the Commercial Register while tax registration processes have not yet been fully completed.



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For the case study, it is not decisive whether this situation is unusual. What matters is that it existed in the specific case. At the time the invoice was issued, the customer could not enter a German VAT identification number with Qonto because no such number had yet been issued to him.

From a communication perspective, this gives rise to an important question:

- **When does a customer need to know that information not yet available may later trigger an economic consequence?**

9.3 Information Before the Economic Consequence Occurs

Qonto subsequently explained to the customer the relationship between the VAT identification number and French VAT. This made the reason for the invoice amount generally understandable to the customer.

For the analysis, however, the timing of this information is also important. Information performs different functions depending on when it reaches the individual.

Before an economic consequence occurs, it can enable a decision. After the economic consequence has occurred, it can only explain that consequence. This gives rise to an important distinction:

- **preventive information → enables action**
- **subsequent information → enables understanding**

Both may be necessary and useful. They are not, however, the same.



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If the existence of a VAT identification number is decisive for the tax treatment of a later invoice, the question therefore arises whether, and at what point before the invoice was issued, the customer could recognize:

- **that this information was required;**
- **what consequence its absence would have; and**
- **whether, and until when, he could still influence that consequence.**

9.4 The Amount Is Not the Measure of Significance

The French VAT actually charged amounted to EUR 20.73. This amount is economically manageable.

For the case study, however, it would be methodologically incorrect to assess the significance of the process solely on the basis of this amount. The analysis does not examine whether EUR 20.73 constitutes substantial financial damage to the customer. It examines the process through which this economic consequence arose and was subsequently explained.

An information problem does not become communicatively better or worse merely because its financial outcome happens to be small or large. At the same time, proportionality must be maintained.

The case study does not turn an amount of EUR 20.73 into a major economic loss. It uses a manageable, concrete process to examine how a digital financial process handles economically relevant information.



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9.5 The Statement That an Issued Invoice Cannot Be Corrected

The process takes on particular significance because of the subsequent information that the invoice already issued could not be corrected. This statement differs qualitatively from the preceding explanation of the billing mechanism.

The statements:

- **“Without a VAT identification number on file, French VAT was charged”**

and

- **“This invoice, once issued, cannot be corrected”**

perform different functions. The first statement describes or explains a process. The second statement closes off a further course of action from the customer's perspective. The communicative quality of the information therefore shifts:

- **explanation of a state → statement about whether that state can be changed**

For the individual, this is of considerable significance. The statement that an invoice cannot be corrected does not merely explain what has happened. It simultaneously informs the customer that no subsequent change to that outcome is possible. This gives rise to the question of the basis on which such a statement is made and which entity is responsible for it.

9.6 General Process Rule and Specific Individual Case

For the analysis, a distinction must be made between a general process rule and the assessment of the specific circumstances of the individual case.



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It is conceivable that a billing system automatically generates an invoice on the basis of certain stored data. Likewise, a company may establish internal rules governing how invoices that have already been issued are handled subsequently. From the external perspective, however, it is not apparent what internal review actually took place in the specific case.

The case study therefore asserts neither that the invoice necessarily had to be corrected nor that the statement concerning its inability to be corrected was automatically generated. Instead, it initially asks a different question:

- **Did the statement merely reproduce a general process rule – or was the specific case individually examined to determine whether correction was legally and factually possible?**

This distinction will become important later when automation, AI, function, and responsibility are examined.

9.7 Legal Dimension of Invoice Correction

At this point, a specific legal question arises for the first time because the general statement that an invoice already issued cannot be corrected is not exclusively a question of communication quality. French law expressly recognizes the instrument of a **corrective invoice (“facture rectificative”)**. Article L216-26 of French law defines a corrective invoice as a document or message by which incorrect information in a previously issued invoice may be replaced or removed, or missing information may be added.

It therefore cannot be generally inferred merely from the fact that an invoice has already been issued that subsequent correction of an invoice as such is legally excluded.



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For the specific case, however, this does not yet mean that Qonto was obliged to correct this particular invoice or reimburse the French VAT charged. That would require separate examination, in particular, of the tax treatment of the specific transaction, the relevant point in time, the requirements of the reverse-charge mechanism, and the actual tax situation of ICD gUG during the period concerned.

The legal reference therefore initially serves a limited but important function for the case study:

- **It calls into question the blanket assumption that an invoice, merely because it has already been issued, is inherently incapable of subsequent correction.**

This does not anticipate the outcome of the tax-law assessment of the individual case.

A distinction is drawn between two different statements:

- **“This specific invoice cannot be corrected for a particular legal reason.”**

and

- **“An invoice that has already been issued cannot be corrected.”**

The second statement is considerably broader and therefore requires a correspondingly sound basis.

9.8 Recognizability of Function and Responsibility

The statement that the invoice could not be corrected also leads to another question that will need to be examined in greater detail later. If a communication conclusively excludes an economically relevant course of action, the customer must be able to recognize what function that statement performs within the process.



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Is it:

- **general information;**
- **a technical system limitation;**
- **an internal business practice;**
- **a tax-law assessment; or**
- **the result of an examination of the specific individual case?**

These distinctions are not merely academic for the customer. They determine whether, and by what means, he can question the statement, provide additional facts, or request a renewed review. This brings us once again to our analytical chain:

- **information → significance → possibility for action → responsibility**

The more conclusively information affects an individual's available courses of action, the more important its clear functional classification becomes.

9.9 Paid Service and Additional Clarification Effort

This process must likewise be considered in the context of the paid service. The invoice itself concerns precisely the fee charged for that service. The customer's actual economic burden, however, is not limited to the EUR 124.38 shown on the invoice. It also includes the effort required to understand the composition of the invoice, determine the reason for the French VAT, clarify the significance of the VAT identification number that was not yet available, and examine the possibility of subsequent correction.

The relationship developed earlier thus becomes more concrete:

- **invoice amount + own clarification effort + working time consumed = actual economic burden of the process**



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Again, this does not automatically establish a legal right to reimbursement. For the assessment of the actual efficiency of the service, however, this effort is relevant. Particularly with a digital self-service service, the question should therefore not be limited to how efficiently the provider processes a matter technically. It must also be examined how much effort the individual must expend in order to understand the result of that process and, where necessary, respond to it.

9.10 Questions for QONTO SA

This process gives rise in particular to the following questions for QONTO SA's internal perspective:

- ▶ **At what point and at what time was the customer informed that the absence of a European VAT identification number on file would result in French VAT being charged?**
- ▶ **What options exist for a newly established company that has not yet been issued a VAT identification number at the time of the first invoice?**
- ▶ **On what specific basis was the customer informed that the invoice already issued could not be corrected?**
- ▶ **Did this statement describe a technical limitation of the billing system, an internal business practice, or a legal or tax-law assessment?**
- ▶ **Was the specific case individually reviewed before this statement was made?**



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- ▶ **What options generally exist for correcting an invoice already issued if it subsequently becomes apparent that information was incorrect or needs to be supplemented?**
- ▶ **Which entity within QONTO SA bears professional responsibility for providing such information?**

Again, these questions do not presuppose unknown internal processes. Their purpose is to supplement the customer's documented external perspective with QONTO SA's actual process and decision-making basis.

9.11 Interim Conclusion

The process concerning French VAT adds a new dimension to the analysis.

Until now, the predominant questions have been:

- **What do I need to do?**
- **Has my action been completed?**
- **Why is a function unavailable?**
- **Do I need to act or wait?**

With the invoice, another question is added:

- **What economic consequence has occurred – why did it occur, and can I still influence it?**

This means that a factually correct explanation of the resulting state is not always sufficient in itself.



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For the individual's capacity to act, it is equally important to be able to recognize which of their actions influence the economic consequence, when that action would be required, whether a consequence that has already occurred can still be changed, and who is responsible for the corresponding decision. The invoice for EUR 124.38 and the EUR 20.73 in French VAT included in it are therefore not of particular interest to the case study because of their absolute amount.

They provide a concrete case in which the relationship between information, economic consequence, subsequent explanation, and the individual's possibility for action can be observed. And it is precisely the statement that an invoice already issued cannot be corrected that leads to a question extending beyond this individual invoice amount:

- **What happens in a digital process when information becomes an apparently final decision – and how can the individual recognize who or what made that decision and on what basis?**

Chapter 9 thus leads naturally into the subsequent analysis of **process guidance, automation, AI, function, and responsibility**.

Footnote

[1] French law on corrective invoices ("facture rectificative"), Art. L216-26, introduced by **Ordonnance No. 2026-671 of July 27, 2026**. The provision describes a corrective invoice as a document or message through which incorrect information in a previously issued invoice may be replaced or removed, or missing information may be added. Its inclusion here is not intended as proof of a specific right of ICD gUG to reimbursement or correction, but to place in legal context the general statement that an invoice already issued cannot be corrected.



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10. Transfer of the Remaining Balance and Process Guidance

After the decision to end the business relationship with Qonto, the balance remaining in the business account was to be transferred to the new business account.

From the customer's perspective, the process had a clear objective:

- **The remaining balance was to be transferred to the new business account.**

Technically, this objective was ultimately achieved. The remaining balance was transferred by bank transfer.

For the case study, therefore, the decisive question is not whether a transfer was possible. Rather, the analysis examines what path the customer had to take within the digital process in order to achieve this objective, what information was available to him, and what decisions were recognizable to him.

10.1 A Clear Objective Encounters the System's Process Logic

From the customer's perspective, the task was initially simple:

- **specify recipient account → specify amount → execute transfer**

Within the digital system, however, this objective had to be translated into the process structure provided by the system. In the transfer process initially selected, a BIC was required in addition to other recipient information.



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When the German bank details were entered or used, the customer was instructed to use the SEPA transfer process for this transfer. This information may have been entirely factually correct.

For the analysis, however, the question again arises whether correct information also constitutes complete process guidance. The instruction:

- **“Use a SEPA transfer”**

answers:

- **“Which process is the correct one?”**

It does not necessarily answer:

- **“How do I get directly from my current process to that process?”**

This reveals a distinction already familiar from the preceding analysis:

- **correct information ≠ complete enablement of action**

10.2 Recognizing the Wrong Path and Finding the Right One

A digital system can correct an individual in different ways. It can inform them that the path they have chosen will not lead to the intended objective. It can explain which other path is required. And, where appropriate, it can take them directly to that other path.

These functions are not identical. In the process under examination, the customer received the information that a SEPA transfer was to be used for the German bank details.

The correct substantive classification was therefore recognizable.

The customer then had to open or find the process intended for that purpose himself.



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The additional work therefore did not consist of determining the substantive rule itself. It consisted of translating the information received into the next concrete action.

The process chain was therefore not immediately:

- **input → system recognizes SEPA destination → appropriate process → continuation**

but, from the customer's perspective, initially:

- **input → instruction to use another process → orientation → opening the other process → continuation**

Whether direct redirection would have been technically possible or appropriate within the system architecture cannot be assessed from the external perspective.

The case study therefore does not develop a specific technical solution. It merely documents the additional orientation step.

10.3 Information Requires a Transition to Action

This process illustrates an important characteristic of communication that enables action. It is not always sufficient to tell an individual what is correct. It may be equally important whether they can recognize how to move from their current position to the correct action.

This expands our analysis so far:

- **information → significance → action**

by adding another practical question:

- **How do I get to the action?**



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Particularly in digital systems, this connection between information and function can be decisive. An instruction referring to another function has a different practical value from an instruction that simultaneously provides an immediately recognizable transition to that function.

The question is therefore not:

- **“Was the information correct?”**

but additionally:

- **“How much orientation work of my own was required to translate the correct information into the correct action?”**

10.4 The Transfer Is Successfully Executed

Once the correct transfer process had been found, the remaining balance could be transferred. The process therefore ended successfully from a technical perspective. This finding is important to the assessment.

The case study does not examine a failed payment transaction.

It examines a successful payment transaction whose process guidance permits additional observations.

This avoids an equation that is fundamental to the entire study:

- **additional effort ≠ technical failure**

A process can function technically while nevertheless creating additional orientation, decision-making, or monitoring effort for the individual. Conversely, additional effort does not automatically mean that the process is defective or unlawful. It is initially documented as part of the actual use of the service.



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10.5 Instant Transfer and Recognizable Choice

In the specific case, the remaining balance was ultimately transferred by instant transfer. For the case study, this raised another question. In the preceding process, it was not clearly apparent to the customer whether, or at what point, he could choose between a regular SEPA transfer and an instant transfer. Again, it is not asserted that a particular choice necessarily had to be offered. Nor is it asserted that the instant transfer actually executed was disadvantageous to the customer.

The subject of the analysis is different:

- **Was an existing possibility for choice recognizable to the individual as a possibility for choice?**

The analysis thus shifts from mere operability to **self-determination**.

10.6 A Choice Requires Recognizable Alternatives

A decision requires more than the technical existence of several possibilities. The individual must know that those possibilities exist and how they differ for them. Otherwise, the system may technically provide several options while the individual experiences only a predetermined process.

This gives rise to an important distinction:

- **technical possibility for selection ≠ recognizable possibility for choice**



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For a self-determined decision, the individual generally needs information about:

- **what alternatives exist;**
- **how they differ;**
- **what consequences are associated with them; and**
- **how the selection can be made.**

How extensive this information needs to be depends on the specific process. Not every technical variation necessarily has to be presented as a conscious choice. Where different methods of execution have different relevant consequences for the customer, however, their recognizability becomes increasingly important.

10.7 Comparative Observation: Commerzbank

For the purposes of the analysis, the customer also had access to the newly established business account with Commerzbank. There, a different design of the execution decision was apparent for transfers: the customer is visibly offered a choice of execution method within the transfer process.

This observation is expressly **not** used to make a general assessment of the two providers.

It does not lead to either of the conclusions:

- **“Commerzbank is better”**

or:

- **“Qonto is worse.”**



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The comparison concerns exclusively one specific communicative function within two processes. The comparative question is:

- **How is the individual informed within a transfer process that different methods of execution exist and that a choice can be made between them?**

Commerzbank therefore serves exclusively as a reference object for an alternative process design. This comparison is methodologically useful precisely because it demonstrates that the same fundamental task — executing a transfer — can be structured differently in communicative terms.

10.8 Self-Service and Self-Determination

The process therefore leads to a more fundamental distinction. **Self-service** initially means that the customer performs a process himself. **Self-determination**, by contrast, means that within the decision-making scope relevant to him, the customer can recognize and decide what is to happen. The two are not identical. A digital process can be designed entirely as self-service and nevertheless present the individual with a largely predetermined path. Conversely, a highly structured process can still be self-determined if the decisions relevant to the individual remain clearly recognizable. The decisive question is therefore not:

- **“Does the customer operate the system himself?”**

but:

- **“Can the customer make those decisions himself within the system that are relevant to his objective and their consequences?”**

Process design therefore directly affects human capacity to act.



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10.9 Process Guidance and Division of Work

The transfer process can also be considered from the perspective of the distribution of work already developed in the preceding chapters. With a self-service account, the customer naturally performs part of the work himself. He determines the recipient, enters the necessary information, specifies the amount, verifies the information, and authorizes the transfer. That is **usage work**. This must be distinguished from additional effort that arises when the customer first has to determine:

- **which transfer process is the correct one;**
- **how to reach that process; or**
- **which execution method the system will use.**

That is **orientation or clarification work**. This distinction is important because not every action performed by the customer should be understood as a problematic transfer of work. Self-service is based precisely on the customer operating the service himself.

The analytical question is instead:

- **Which work forms part of the intended use — and which additional work arises only because the individual has to work out the system's process logic?**

The transfer process therefore connects directly with the forms of additional customer effort already observed in Chapters 6 and 7.



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10.10 From the Individual Process to the Complete Chain of Action

The observations made so far now allow a more comprehensive chain of action to be derived:

- **information → significance → decision → action → execution → feedback**

Each link performs its own function:

- **Information: What is the case?**
- **Significance: What does this mean for my objective?**
- **Decision: What options do I have?**
- **Action: What do I need or want to do?**
- **Execution: What does the system do as a result of my action?**
- **Feedback: What actually happened, and has the process been completed?**

A technically successful process can skip individual levels because the system can already derive the required decision from its rules. That can be efficient. It raises an additional question, however, where the level that has been skipped concerns a decision by the individual. Because in that case, the question is no longer exclusively whether the system arrived at the correct result.

It must also be asked:

- **Who determined the direction within the process?**



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10.11 No Finding of a Legal Violation

No legal violation is derived at this point from the transfer process under examination.

The need to use a particular transfer method, additional navigation within an application, or a choice that is not immediately apparent do not, in themselves, establish a violation of a legal norm. Nor is execution as an instant transfer objected to as such.

A legal assessment would need to be conducted separately, in particular, if a specific contractual or statutory obligation concerning information, fees, or execution were affected. No such finding is made on the basis of the process examined here. The finding therefore remains, initially, one of communication and process:

- **The desired economic result was achieved. The path to that result, however, required additional orientation within the process structure provided by the system.**

10.12 Questions for QONTO SA

The following questions arise in particular from this process:

- **What function did the BIC initially required serve within the transfer process selected by the customer?**
- **According to what criteria does Qonto identify or distinguish the transfer methods appropriate for a payment?**
- **What assistance does a customer receive when the system recognizes that a different transfer method should be used for the recipient account entered?**



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- ▶ In such a case, is it possible to transition directly to the appropriate process, or must the customer independently open that process again?
- ▶ What options existed in the specific case between a regular SEPA transfer and an instant transfer?
- ▶ At what point could the customer recognize and, where applicable, influence this choice?
- ▶ What differences between the execution methods that are relevant to the customer are presented within this decision-making process?

Again, these questions serve to supplement the observable customer perspective with QONTO SA's internal perspective.

10.13 Interim Conclusion

The transfer of the remaining balance was technically successful. Precisely for this reason, the process is particularly well suited to distinguishing between technical function and human process guidance. The customer wanted to transfer money from one account to another. The system was able to perform this task.

Between objective and outcome, however, there were several communicative levels:

- Which path is the correct one?
- How do I get to that path?
- What methods of execution are available?
- Can I choose between them?
- Which method was ultimately used?



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This expands the guiding question developed so far. It is no longer exclusively a matter of whether the individual can recognize what they need to do. Increasingly, it is a matter of whether they can recognize **which decisions are being made within the process at all — and which of those decisions are theirs.**

- **Self-service means that the individual operates a process themselves. Self-determination means that within that process they can recognize and make the decisions that are relevant to them.**

It is precisely at this point that the transfer leads us to the next field of analysis:

- **As digital systems take over, automate, and prestructure more and more process steps, how much work do they actually take away from the individual — and how much work or decision-making do they merely shift elsewhere?**

11. Digitalization, Self-Service, and the Shifting of Work

The preceding chapters examined different individual processes within the same business relationship. These included, among other things, the provision of information, the recognizability of process states, missing receipts, the availability of individual account functions, the provision of physical bank cards, account billing, and the execution of a transfer. The individual processes differ in their function and significance. Taken together, however, they reveal a recurring question:

- **What work does the digital system perform – and what work remains with the individual or arises additionally for them?**



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This question is of particular importance when assessing a digital self-service service. Digitalization promises more than technical automation. For the user, it is regularly associated with the expectation that processes can be completed more easily, more quickly, or with less effort of their own. Whether this expectation is actually fulfilled, however, cannot be determined solely by how many process steps have been technically automated. What matters equally is the amount of effort that remains on the part of the individual.

11.1 Self-Service Is First and Foremost a Division of Work

A self-service service is fundamentally based on the customer performing certain tasks independently.

- **He enters data.**
- **He uploads documents.**
- **He initiates payments.**
- **He manages settings.**
- **He reviews information.**
- **He makes decisions.**

There is initially nothing problematic about this. In return, the customer gains the ability to carry out processes independently of opening hours or the immediate availability of an employee. Self-service can therefore offer considerable advantages. The work does not, however, disappear entirely. It is redistributed between the system, the provider, and the customer.

For the analysis, therefore, the decisive question is not whether the customer performs work.



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The decisive question is:

- **Which work is he intended to perform as part of the service – and which additional work arises only from the design of the process?**

11.2 Usage Work and Additional Process Work

The observations made so far allow two forms of customer effort to be distinguished.

Usage work arises from the intended use of the service. This may include, for example:

- **entering required company data;**
- **providing documents;**
- **uploading receipts;**
- **specifying payment recipients and amounts;**
- **authorizing payments; and**
- **making necessary decisions.**

These activities fundamentally form part of using a self-service service. They must be distinguished from **additional process work**. Such work arises, for example, when the customer must:

- **research what information is actually being requested;**
- **check whether an action performed has been processed by the system;**
- **determine why a function is unavailable;**
- **search for status information;**
- **independently work out the meaning of different status indicators;**
- **initiate a support process in order to understand an unclear process state; or**
- **independently determine which of several process paths leads to the intended objective.**



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These activities do not directly serve the customer's actual business purpose. They initially serve to make the digital process itself understandable and usable. This gives rise to an analytically important distinction:

- **Usage work serves to carry out the desired task.**
Additional process work serves to cope with the system through which that task is to be carried out.

11.3 Automation Does Not Automatically Mean Less Work

From a provider's perspective, a process may be highly automated. Documents may be processed automatically. Data may be checked automatically. Status information may be generated automatically. Payments may be categorized automatically.

Decision paths may be technically prestructured. This may significantly reduce the provider's internal effort.

From the customer's perspective, however, the same increase in efficiency does not necessarily follow. If automation results in the customer subsequently having to search for additional information, monitor outcomes, or clarify unclear process states, part of the effort may not have been eliminated. It may merely have moved elsewhere.

A distinction must therefore be made between:

- **work reduction**
- and
- **work shifting**

Both may appear technically as digitalization.



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For the individual, however, they have different economic effects.

11.4 Visible and Invisible Work

Some customer work is immediately visible. Executing a transfer or uploading a receipt is a recognizable activity. Other forms of work are less obvious.

These include in particular:

- **searching;**
- **checking;**
- **comparing;**
- **tracking;**
- **interpreting;**
- **asking follow-up questions;**
- **documenting; and**
- **checking again.**

These activities do not generate an immediately visible business transaction. They nevertheless require time and attention. Precisely for that reason, there is a risk that they will not be taken into account when digital processes are assessed. From the perspective of the case study, however, this work is just as real as the directly visible operation of a function. An hour the customer spends clarifying an unclear process state is an hour that is not available for his actual work. Attention therefore becomes an economic resource.



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11.5 Attention as a Limited Resource

Digital processes do not consume only time. They consume attention. A clearly completed process can disappear from the individual's attention.

An unclear process, by contrast, may remain open:

- **Is this completed?**
- **Is something still missing?**
- **Do I need to respond?**
- **Will the function still be activated?**
- **Has my action been received?**
- **Do I need to ask again?**

Such open questions may cause the individual to revisit a process mentally or actually check it repeatedly. The effort then does not consist only of individual minutes spent operating the system. It also consists of the continued binding of attention.

For the author of this report, this relationship is particularly clearly observable because of his neurodivergence. Open or not clearly completed process states can create increased cognitive binding and stress for him. As already established in the preceding chapters, however:

- **This individual effect does not in itself prove either a barrier or a process failure.**
- **It makes an effect observable that can subsequently be examined to determine whether the underlying information or monitoring effort was necessary or avoidable.**



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11.6 The Actual Effort of a Paid Service

For the economic analysis, it is also decisive that the business account under examination is a paid service. The stated account price therefore describes only part of the actual effort that use of the service may impose on the customer. From the customer's perspective, the relationship can be expressed more comprehensively:

- **account price + own administrative effort + monitoring and clarification effort + consequences of disruptions + working time consumed = actual effort of the banking relationship**

This representation is not a business cost calculation in the strict sense. It serves as an analytical model for the case study. It makes visible that a nominally inexpensive digital service is not necessarily economically inexpensive for the customer if its use requires substantial additional effort of his own.

Conversely, a nominally more expensive service may make economic sense if it significantly reduces the customer's own administrative and clarification effort.

The price of a service is therefore distinguished from the effort required to use it.

11.7 Shifting Work Is Not Automatically Problematic

Here again, an important boundary must be drawn. Not every shift of work to the customer is problematic. It may be an essential feature of a self-service model. A customer may consciously choose to perform certain activities himself if, for example, he gains independence from opening hours, faster processes, or a lower price in return.

The case study therefore does not assess the mere fact that work is shifted. It examines its function and impact.



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Relevant questions include:

- Is it apparent to the customer which tasks he is taking on?
- Can he perform those tasks with the information provided?
- Does additional work arise that would not be necessary for the actual use of the service?
- Is work genuinely reduced, or is it merely shifted from the provider's internal process into the customer's sphere of work?

Self-service is therefore not criticized as such. Its actual division of work is examined.

11.8 Efficiency from Two Different Perspectives

A process may be efficient from the provider's perspective while nevertheless creating additional effort from the customer's perspective. Both statements can be true at the same time.

The provider may consider, for example:

- **degree of automation;**
- **processing time;**
- **scalability;**
- **staffing effort; and**
- **process costs.**

The customer, by contrast, considers:

- **time required;**
- **comprehensibility;**
- **reliability;**
- **need for monitoring;**



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- clarification effort; and
- actual usability.

Neither perspective is inherently wrong. They measure different things. It would therefore be methodologically insufficient to assess the efficiency of a digital service exclusively from the internal process perspective.

A human-centered analysis must additionally ask:

- **How much human effort does the process require in order to actually produce the promised result?**

11.9 Efficiency and Profit as General Design Factors

Economic efficiency is a legitimate objective of a company. Automation, standardization, and self-service can reduce costs while simultaneously improving service quality. The case study does not question this. As already developed in Chapter 1, however, there is a general possibility that optimization may change its function if it is taken too far. If, for example, a process is simplified to such an extent that necessary information is lost, simplification can generate additional clarification effort.

If human support is reduced without the digital system assuming its communicative function, automation can create additional work for the customer. If internal efficiency is achieved by shifting necessary monitoring or clarification work outward, a process that is internally efficient can become inefficient from the customer's perspective.

No corresponding motivation or cause is asserted with respect to QONTO SA.



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This is a general analytical relationship:

- **If economic optimization or efficiency interests are overstretched at the expense of human capacity to act, new barriers and additional workloads can arise.**

Whether such a relationship explains a specific observed process can only be examined once the actual process design and, where applicable, the provider's internal perspective are known.

11.10 Digitalization from the Individual's Perspective

The analysis so far therefore allows a broader concept of efficiency to be developed. For the customer, digitalization does not constitute an increase in efficiency merely because a process has been technically automated. It becomes an increase in efficiency for him when it reduces the **overall effort required to achieve his objective**.

For the case study, this means:

- **Digitalization becomes an increase in efficiency for the customer only when it not only automates work, but also reduces the individual's information, monitoring, and clarification effort.**

If these tasks are instead shifted to the customer, a highly digitalized process may even be more labor-intensive from the customer's perspective than a conventional process. In this context, "conventional" is not synonymous with "analog."



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A traditional credit institution may also operate largely digitally. The decisive distinction is therefore not between:

- **digital and analog**

but between:

- **different forms of distributing work, information, and responsibility within digitally supported processes.**

11.11 Self-Service Requires Particularly Good Communication

From this perspective, a relationship emerges that may initially appear paradoxical:

- **The more independently the customer is expected to carry out a process, the less the system can rely on an employee to explain missing connections.**

Self-service therefore does not require less communication. It requires **precise process communication**. The system does not have to explain every internal process to the individual. It must, however, provide the information the individual needs in order to understand his own role within the process. This includes in particular:

- **What has happened?**
- **What does this mean for me?**
- **Do I need to act?**
- **What do I need to do?**
- **What decision can or must I make?**
- **What happens after my action?**
- **How do I recognize completion?**



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If these connections are missing, communication does not automatically disappear altogether. Part of it is instead produced by the individual himself — through searching, interpretation, monitoring, or asking questions. It is precisely this work that often remains invisible in a purely technical analysis.

11.12 From the Shifting of Work to Process Guidance

The analysis therefore moves to another level. So far, we have asked:

- **Who performs the work?**

An additional question now arises:

- **Who determines the process?**

A system can reduce work for the individual by preparing decisions, organizing information, and offering suitable process paths. But it can also increasingly determine:

- **which information is relevant;**
- **which options become visible;**
- **which paths are available; and**
- **when a process is considered complete.**

The issue is therefore no longer exclusively one of division of work. It is one of **process guidance**. This distinction becomes particularly relevant where automated or AI-supported systems are used.



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The decisive question is then not:

- **“Is AI good or bad?”**

but:

- **“What function does the system perform within the process – does it serve the individual as a tool, or does it itself become the structure guiding the process?”**

11.13 No Legal Assessment of the Distribution of Work as Such

No legal violation is derived solely from the distribution of usage, monitoring, clarification, and orientation work described above. A self-service business model may in principle provide for the customer to perform certain activities himself. A high subjective level of effort does not automatically constitute a violation of a legal norm either.

A legal assessment would be required where specific contractual performance obligations, statutory information obligations, requirements applicable to particular financial services, or other directly relevant legal provisions are affected. Chapter 11, however, initially serves a different purpose. It brings together the different shares of work observed in the individual processes and examines their effect on the individual's actual efficiency and capacity to act. No additional legal norm is required for that purpose at this point.



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11.14 Questions for QONTO SA

Taken together, the observations give rise in particular to the following questions:

- ▶ **Which tasks are customers intended to perform themselves within Qonto's self-service model?**
- ▶ **Which system functions are intended to reduce the resulting information, monitoring, and administrative effort?**
- ▶ **When digital processes are designed, how is the additional clarification or monitoring effort arising on the customer side assessed?**
- ▶ **In addition to their technical functionality, are processes also examined for the amount of orientation and interpretive work they generate for the customer?**
- ▶ **To what extent are processes tested from the perspective of individuals who were not involved in their development and who do not know the internal process logic?**
- ▶ **How is it assessed whether automation actually reduces work or merely redistributes it between provider and customer?**

These questions do not concern any presumed motivation on the part of QONTO SA. Their purpose is to clarify how the customer's observed external perspective relates to the actual design and objectives of the processes.



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11.15 Interim Conclusion

The individual observations made so far cannot be reduced to the simple assertion that digital processes are complicated or that self-service creates work. Self-service is a form of division of work. The decisive question is therefore not whether the individual performs work within such a system.

The decisive question is **what work they perform and why**. The case study therefore distinguishes:

- **usage work**, which forms part of the intended use of the service, from
- **additional process work**, which arises through searching, interpretation, monitoring, and clarification.

This also changes the way digital efficiency is viewed. From a human perspective, a process is not efficient merely because few manual work steps are required internally. What matters is the total effort required for the service to fulfill its purpose for the individual.

For a paid service, this means:

- **The actual price does not consist solely of the amount shown on the invoice. Its economic impact also includes the time, attention, and additional work the customer must expend in order to use the service he has paid for.**

This finally brings us to a question that extends beyond workload. If a digital system selects information, structures courses of action, opens or excludes possibilities, and may prepare or make decisions, we need to know what function that system actually performs.



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12. Human Beings, AI, Function, and Responsibility

The preceding chapters have shown that digital processes can relieve individuals of different tasks. They can organize information, review data, define possible courses of action, execute processes, generate status information, and prepare decisions. As automation increases, therefore, the question is not merely what work a digital system performs. Equally important is:

- **What function does the system perform within the process?**

This question must be distinguished from the general discussion of whether artificial intelligence should be regarded positively or negatively. Such an assessment is not the subject of this case study. Instead, the study examines how automated or AI-supported systems are used within communication or a process and what effect their respective function has on the individual's capacity to act.

The central question is therefore:

- **Does the system serve the individual as a tool within a process guided by that individual or by responsible human beings – or does the system itself increasingly assume the function of a process-guiding structure?**



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12.1 Tool and Process-Guiding Structure

A digital or AI-supported system can assist individuals with numerous tasks.

- It can search for information.
- It can structure matters.
- It can compare data.
- It can perform calculations.
- It can identify anomalies.
- It can prepare wording.
- It can present possible courses of action.
- It can prepare decisions.

In these functions, the system expands human capacity to act. The individual or the responsible organization continues to determine which objective is to be pursued and what significance is attached to the result. A different situation arises when the system does not merely support the achievement of a human-defined objective, but itself determines:

- which information is taken into account;
- which possibilities are offered to the individual;
- which paths are excluded; or
- which outcome is treated as final.

Its function then changes. The decisive distinction is therefore not:

- “Human or machine?”

but:

Who or what guides the specific process – and who bears responsibility for its outcome?



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12.2 Automation and AI Are Not the Same Thing

For the purposes of the case study, a distinction must also be made between automation and artificial intelligence. Not every automated process uses AI. A system can review information or trigger actions according to fixed programmed rules without any AI system being involved.

Conversely, AI may be used merely in a supporting role within a process while the substantive decision remains entirely with a human being. From the customer's external perspective, it is therefore not possible to infer solely from a process that appears automated which technology was actually used internally.

The case study makes such findings only where they can be documented.

Where this is not possible, the question is not:

- **“Did AI make the decision here?”**

but:

- **“What function did the communication or decision recognizable to the customer perform – and who or what was responsible for it?”**



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12.3 Information, Recommendation, and Decision

For the analysis, three functions in particular must be distinguished.

Information

- A system communicates a fact.

Recommendation or decision support

- A system processes information and provides a basis for a further decision.

Decision

- An outcome is treated as binding or as concluding the process in the specific case.

These functions may appear linguistically similar, but they have different significance for the individual.

For example, a system may state:

- “The invoice includes 20 percent French VAT.”

This is initially information about a fact. It may explain:

- “Under the rule on file, French VAT is charged where no VAT identification number was stored at the relevant time.”

This describes a rule or process logic.

The statement:

- “This invoice, once issued, cannot be corrected.”

performs a different function.



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From the customer's perspective, it closes off a specific course of action. The decisive question is therefore not whether this statement was formulated by a human being or a machine.

The first question is:

- **What function does the statement perform within the specific process?**

12.4 General Rule and Individual Circumstances

Digital systems are particularly well suited to applying general rules reliably and repeatedly. For many processes, this is precisely their advantage. A general rule and the assessment of a specific case, however, are not identical.

A system may, for example, determine that a particular characteristic is present or absent. It can then calculate an outcome or prepare an action on the basis of predefined criteria. Where, however, an individual assessment of the specific person or specific circumstances is required, a different question arises:

- **Is the application of predefined criteria sufficient – or must the individual case additionally be assessed on its own merits?**

For the case study, this means:

- **AI can review, compare, calculate, structure, and prepare a decision within predefined criteria. Where an individual assessment of the specific person and their specific circumstances is required, however, merely processing predefined criteria cannot replace that individual decision.**



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The boundary therefore does not lie between human and machine processing of information. It lies between **decision support** and the assumption of a decision for which the specific individual case must be assessed individually.

12.5 Recognizability of the Communication Partner

During the communication examined, different designations or senders appeared. These included, among others, a contact or handoff point designated as an “Operator,” as well as responses under the names “Aleksandra,” “Zlatan B.,” and “Martha C.”

The case study makes no finding from this about the identity of these communication partners. In particular, it does not assert: that “Aleksandra” was an AI system, that “Zlatan B.” was a pseudonym, or that any of the responses concerned were generated entirely automatically.

The observation is narrower:

- **From the communication visible to the customer, it was not always possible to determine unambiguously who or what had produced the specific response and bore professional responsibility for it.**

This uncertainty becomes significant where the communication does not merely contain general information but communicates a determination relevant to the specific process.



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12.6 Transparency in Direct AI Interaction

This observation now also has a specific legal dimension. Article 50(1) of Regulation (EU) 2024/1689 — the AI Act — generally requires AI systems intended to interact directly with natural persons to be designed and developed in such a way that the natural persons concerned are informed that they are interacting with an AI system, unless this is already obvious to a reasonably well-informed, observant, and circumspect person, taking into account the circumstances and the context of use.

Under Article 50(5), the corresponding information must be provided clearly and distinguishably no later than the first interaction or exposure and must comply with the applicable accessibility requirements.

Recital 132 explains the background to this transparency requirement, including particular risks of impersonation or deception, and emphasizes informing natural persons about interaction with an AI system.

For the case study, this provision is therefore not relevant as a general argument against the use of AI.

On the contrary:

- **It presupposes that interaction between humans and AI may take place and addresses the recognizability of that situation.**

Whether Article 50 applies directly to any of the documented Qonto communications depends, however, first on whether a corresponding AI system actually interacted directly with a natural person.



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From the documented external perspective, this cannot yet be established for all of the communications concerned.

The case study therefore does not assert a violation of Article 50 of the AI Act.

The provision does, however, explain why the question:

- **“Am I communicating here with a human being or with an AI system?”**

is by no means legally irrelevant in the case of corresponding direct AI interaction.

12.7 Verifiability and Capacity to Act

For the individual, recognizing the communication partner serves a practical function.

If the information merely states:

- **“Your case has been received.”**

the precise professional responsibility for the immediate action may be of limited importance. If, by contrast, the customer is told:

- **“This invoice cannot be corrected.”**

a different question arises:

- **Who or which entity made or bears professional responsibility for this statement?**

This is important not because the customer necessarily needs to know the name of a particular person. What matters is the ability to assign function and responsibility.



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Where necessary, the customer must be able to recognize:

- **whether he is receiving system information;**
- **whether a support employee is reproducing a general process rule;**
- **whether a specialist unit has examined the specific circumstances; or**
- **whether a final decision has been made.**

This distinction affects his further possibilities for action. A central relationship therefore emerges:

- **Verifiability protects the capacity to act and the capacity to exercise legal rights.**

12.8 Human Relationship as a Distinct Level of Communication

A further level must be distinguished from this functional and legal question.

Communication does not take place solely through the transmission of factual information. Human beings also respond to tone, resonance, empathy, and the perception of a human counterpart. A negative outcome may remain factually unchanged and still be processed differently depending on how it is communicated.

For the case study, this does not mean that digital or AI-supported communication is inherently impersonal or unsuitable. Nor is any particular form of human communication assessed as generally superior. Instead, a specific effect is documented:

- **For the author of this report, communication that could not always be clearly attributed created a communication situation experienced as sterile and distant.**



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This personal effect must be distinguished from the functional question of verifiability.

Two different levels therefore emerge:

- **Verifiability protects the capacity to act and the capacity to exercise legal rights. Human relationship influences the quality of communication.**

The two may interact, but they are not the same.

12.9 Competence and Responsibility

The further a digital system reaches within a process, the more important the distinction becomes between technical capability and assigned competence. A system may be technically capable of classifying a matter or excluding a process path. This does not automatically mean that, within the specific procedure, it is intended to have the function of making a final decision.

A simple example illustrates the distinction. An automated access system may, within a predefined function, check whether a stored access criterion has been satisfied. It thereby makes a technical decision about access within precisely that assigned function. This does not, however, give it general competence to develop additional unrelated criteria or to assess the individual outside that function. The analytical chain is therefore:

- **technical capability → assigned function → competence within that function
→ responsibility for the outcome**

Particularly with AI-supported systems, these levels must not be confused.



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12.10 Automated Decisions and Article 22 GDPR

Data protection law also recognizes a legally relevant boundary concerning automated decisions.

Article 22(1) GDPR generally protects a data subject from being subject to a decision based solely on automated processing that produces legal effects concerning them or similarly significantly affects them.

Article 22(2) provides exceptions; in certain permitted cases, paragraph 3 requires safeguards including at least the possibility of human intervention, the opportunity to express one's own point of view, and the ability to contest the decision.

For the process examined here, however, an important limitation must be observed. The GDPR protects natural persons with regard to the processing of their personal data. The Qonto account examined here, by contrast, is a business account of ICD gUG as a legal entity.

The facts documented so far therefore do not establish that a specific decision based solely on automated processing within the meaning of Article 22 GDPR was made concerning the author of this report as a natural person.

The case study consequently does not find a violation of Article 22 GDPR. The provision is instead relevant to the analysis insofar as it makes a **legislative value judgment** visible:

- **Where exclusively automated processing produces significant decisions concerning natural persons, human intervention, the opportunity to state one's position, and the ability to contest the decision become legally relevant.**



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For our functional analysis, however, this normative reference does not replace examination of the provision's specific scope of application.

12.11 Human Involvement Must Have a Function

The mere presence of a human being somewhere within an automated process does not answer the question of what function that person actually performs. If a system generates an outcome and an employee merely forwards it, that employee's function differs from a situation in which the employee can independently examine the circumstances, question the outcome, and change it where appropriate.

For the analysis, therefore, the relevant question is not merely:

- **“Was a human being involved somewhere?”**

but:

- **“What actual function did that human being perform within the specific process?”**

The same applies in reverse to AI. The mere involvement of an AI system says nothing about whether it served merely as a tool or actually determined the subsequent process. The functional analysis therefore remains technology-neutral.

12.12 Responsibility Must Remain Assignable

Regardless of whether information was formulated by a human being, prepared by AI, or generated by an automated system, the service remains part of a business relationship between responsible legal entities.



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Automation does not eliminate responsibility. It may merely change the path by which information or a decision is produced. The individual therefore does not need to see every internal technical step through which an outcome was generated. They must, however, be able to recognize where a statement relevant to them functionally belongs and by what means it can, where necessary, be reviewed.

The analytical chain developed so far can therefore be expanded:

- **recognizability → function → competence → responsibility → capacity to act**

For the case study, this chain is more important than the mere question of whether AI was used somewhere.

12.13 Who Determines the Direction?

This brings us to the central question of this chapter. An AI-supported system can significantly expand human capacity to act. It can make complex information accessible, explain relationships, make alternatives visible, and support individuals in making decisions. Depending on its specific function, however, it can also structure the space within which the individual is able to act at all.

The decisive question is therefore:

- **Who determines the direction within an AI-supported process – the individual with their concerns and needs, or the system on the basis of its predefined process logic?**

This question, too, does not yet contain an assessment.



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A highly structured process may be objectively necessary, efficient, and entirely appropriate for the user. For another user or another set of circumstances, the same structure may create additional obstacles.

The case study does not decide whether such a system is “good enough” for every individual. It describes its observable function and its effect in the specific case.

Whether the resulting functionality of a digital service meets another individual's expectations and needs is for that individual to decide.

12.14 Questions for QONTO SA

To supplement the external perspective with QONTO SA's internal perspective, the following questions arise in particular:

- ▶ **Which of the communication channels used in the process under examination were supported by AI systems or other automated systems?**
- ▶ **In which communication processes, if any, did the customer interact directly with an AI system?**
- ▶ **What function did the designations “Operator,” “Aleksandra,” “Zlatan B.,” and “Martha C.” perform?**
- ▶ **Were responses transmitted under these designations created entirely by natural persons and professionally assumed by them, or were automated or AI systems used?**
- ▶ **How is it made apparent to the customer when they are interacting directly with an AI system?**



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- ▶ Which functions may automated or AI-supported systems perform independently within the customer process?
- ▶ At what point is a human professional review provided when a statement excludes a specific course of action for the customer?
- ▶ Which entity bears professional responsibility for the statement that an invoice already issued cannot be corrected?
- ▶ By what means can a customer have such a statement submitted for renewed professional review?

These questions presuppose neither the use of any particular technology nor any particular internal organizational structure. Their purpose is to clarify which functions were actually performed by human beings, automated systems, or AI and how responsibility for them is organized.

12.15 Interim Conclusion

For this case study, the question of artificial intelligence cannot meaningfully be answered in terms of “good” or “bad.” Nor can it be concluded from the mere involvement of a human being that a process is therefore human-guided. What matters is **function**.

A system can:

- **inform;**
- **structure;**
- **review;**
- **calculate;**
- **recommend;**



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- **prepare;**
- **execute; or**
- **decide.**

These functions have different effects on the individual's capacity to act. The central question is therefore not:

- **“Was AI involved here?”**

but:

- **“Which function was performed by whom or what – and what possibilities for action remained with the individual?”**

This gives rise to the following criterion for analysis:

- **recognizability → function → competence → responsibility → capacity to act**

The case study therefore assesses neither QONTO SA as a company nor artificial intelligence as a technology. It assesses the function of specifically observed processes and acts of communication and describes their effect on the individual. Whether the resulting functionality of a digital service meets another individual's expectations and needs is for that individual to decide.

Footnotes

[1] Regulation (EU) 2024/1689 (AI Act), Art. 50(1) and (5). The provision generally requires that, where AI systems are intended to interact directly with natural persons, the AI interaction be recognizable unless it is already obvious; the information must be provided clearly and distinguishably no later than the first interaction or exposure.

[2] Regulation (EU) 2024/1689, Recital 132. This explains the transparency requirement particularly against the background of possible risks of impersonation and deception and also addresses the accessibility of corresponding information.



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[3] Article 22(1) and (3) GDPR. The provision concerns decisions based solely on automated processing that produce legal or similarly significant effects concerning a natural person; in certain permitted cases, human intervention, the opportunity to express one's point of view, and the ability to contest the decision are among the safeguards provided.

13. Comparative Observations and the Customer Perspective Outside the Project

The analysis so far is based on specific experiences within the business relationship between ICD – Institute for Communication & Dignity gUG (haftungsbeschränkt) and Qonto. A case study of this kind therefore necessarily has a limited perspective.

The customer knows his own perceptions, actions, and the information made available to him. QONTO SA knows its internal processes, objectives, technical relationships, and organizational decisions.

Neither perspective, taken on its own, represents the entire process.

For the analysis, this gives rise to an additional question:

- **How can observed communication and process functions be classified without deriving from them a general assessment of the provider under examination?**

One possibility is to use comparable specific processes of other providers as references.

The purpose is not to determine which provider is better.

The analysis examines exclusively:

- **How is a comparable communicative task addressed in another process, and what function does that design perform for the individual?**



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13.1 Comparing Functions Rather Than Companies

A comparison of individual processes does not permit a general statement about the quality of the companies involved. A provider may address a particular communicative task very clearly while offering, elsewhere, a process that is difficult for the same customer to understand. Likewise, another provider may choose a different design for precisely that task.

The case study therefore uses comparative observations exclusively on a functional basis. The comparison is not:

- **Qonto** → **bad**
- **other provider** → **good**

but, for example:

- **information need** → **design A** → **effect on the customer**

compared with:

- **comparable information need** → **design B** → **effect on the customer**

This does not establish a ranking. It makes different solutions to the same or a comparable communication task visible.

13.2 Commerzbank: Formation Situation as a Comparative Process

After the decision to end the previous business relationship, a business account was established for ICD gUG with Commerzbank. This process provided an opportunity to compare certain process functions with the account-opening process documented previously. It must be taken into account that the systems, contractual terms, and internal review processes are not identical.



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Different procedures therefore do not automatically permit the conclusion that one provider could or should design the same process in the same way as another.

Something else is of interest to the case study:

- **What information did the same customer receive in a comparable task, and what effect did that information have on his capacity to act?**

13.3 Company Information Already Available

During Commerzbank's account-opening process, information about ICD gUG already available from the Commercial Register was displayed to the customer. This included, among other things, the legal form, date of formation, address, competent registration court, and Commercial Register number.

For the case study, it is not decisive from which internal or external source these data were technically obtained.

What was observable was simply:

- **The customer did not first have to gather again information that was already available within the process in order to recognize its significance within that process.**

This illustrates one possible function of digital process design:

- **Existing information can not only be stored or checked; it can also be used to reduce the individual's workload.**

This is not an assessment of the provider. It is an observation concerning the function of this specific process step.



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13.4 Tax Information Not Yet Available

A further comparative observation arose in connection with the tax registration of the newly established company. At the time the account was opened, not all tax information was yet available. The process took this formation situation into account by providing a period of 90 days for a tax number that had not yet been issued.

Again, the case study does not examine whether this specific period is generally appropriate or transferable to other providers. What is of interest is its communicative function.

The customer could recognize:

- **The information is missing.**
- **Its absence is anticipated in the current process state.**
- **The information must be provided later.**
- **There is a defined time frame for providing it.**

A missing piece of information was thereby transformed into a **defined process state**.

That is different from a situation in which the customer merely recognizes that information is missing without knowing what significance this has for the subsequent process.

13.5 Existing Customer Relationship as Part of the Process

In the specific Commerzbank process, an existing customer relationship could be used for identification. The customer already had online banking and the corresponding authorization procedure.

This existing structure was made usable within the new process.

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Again, no general statement about the quality of the provider is derived from this. Rather, the observation demonstrates a particular process function:

- **Existing structures that are suitable for the new process can be used to avoid additional work for the individual.**

Whether such reuse would be technically, legally, or organizationally possible in another system is not answered by this observation. The comparative observation merely shows that it worked in this specific process.

13.6 PayPal: Identifying Missing Information

A further comparative observation outside the project arose on September 6, 2026, in communication from PayPal. The customer was informed that additional information was required. What was decisive for the case study, however, was not merely this request. The communication also identified what information was missing — tax information — explained the context, and provided an immediately recognizable means of adding that information.

From the customer's perspective, this created a closed communication chain:

- **What is missing? → Why is it needed? → What do I need to do? → Where can I do it?**

This comparison likewise contains no general statement about PayPal. It merely illustrates, through a specific example, the function that directly assigned information can perform.



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13.7 Comparison With the Request for “Additional Information”

This is precisely what makes comparison with the Qonto communication of July 19, 2026, examined in Chapter 4 analytically interesting. There, the customer was informed that additional information was required and that failure to provide it could have consequences for continued use of the account. A means of submitting additional information was available.

For the customer, however, it initially remained unclear which specific information was missing. In the PayPal comparative observation, an additional information need likewise existed.

There, by contrast, the customer could immediately recognize:

- **what information was missing;**
- **why it was required; and**
- **by what means it could be added.**

The comparison is therefore not:

- **“PayPal communicates better than Qonto.”**

It is:

- **For a comparable communicative task, the two observed pieces of information performed different functions for the customer’s immediate capacity to act.**

The functional difference can therefore be described without deriving a general assessment of either company.



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13.8 Project Knowledge and Customer Knowledge

These comparative observations lead to a more fundamental issue in digital process design. People who develop, test, operate, or regularly support a process possess knowledge of its structure.

They may know:

- **terminology;**
- **sequences;**
- **dependencies;**
- **the meaning of status indicators;**
- **exceptions; and**
- **expected next steps.**

For them, information may therefore be unambiguous because it is placed within an already existing process model. The customer does not necessarily possess this internal process knowledge. He sees only what the system communicates to him at the particular moment. The same information can therefore have different effects from two different perspectives.

From the project perspective, an indication may appear complete.

From the customer's perspective, a connection may nevertheless be missing. It does not follow that either perspective is wrong. They simply operate from different starting conditions.



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13.9 The Outside-the-Project Perspective

This difference gives rise to a working hypothesis for the case study. Recurring information and orientation issues may provide reason to examine the extent to which an overall system has been tested from the perspective of individuals who were not involved in its development and do not know its internal process logic.

The case study does not know how Qonto actually organizes such testing. It therefore asserts neither that testing with individuals outside the project was absent nor that this was the cause of the observed processes.

The hypothesis is narrower:

- **The communication problems observed give us reason to ask to what extent the overall system was tested from an outside-the-project customer perspective. We cannot assess whether this was in fact a cause. From our perspective, however, the recurring observations provide reason to examine this possibility more closely.**

The unknown internal cause therefore expressly remains open.

13.10 The Customer Does Not Know the Project

For the design of a self-service system, this perspective is particularly important. The customer does not need to know the internal architecture of a system.

He does not need to know:

- **which department is responsible;**

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- which database is being used;
- which technical status has been set internally;
- which review is taking place in the background; or
- which process logic leads to the next screen.

He must, however, receive enough information to understand his own role within that system. This gives rise to a simple but central criterion:

- **A digital system must not only function within its own logic. It must function for the individual who does not know that logic.**

This brings us full circle to our analysis of capacity to act.

13.11 Comparison as an Instrument of Insight

The comparative examples therefore perform three functions. First, they demonstrate that an observed information need does not have to be described only theoretically. It can be made concrete by reference to an actually observed alternative process design. Second, they help distinguish between necessary complexity and specific design. If the same or a comparable task can be communicated in different ways, it becomes apparent that at least parts of its design are not inevitable. Third, the comparative examples protect against premature generalization.

The alternative design is not declared a universal ideal either.

It merely demonstrates:

- **A different functional design is possible.**

Whether that design would be technically, economically, legally, or organizationally appropriate in another system remains a separate question.



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13.12 No Ranking and No Judgment of Providers

The case study does not create a ranking of financial service providers. Nor does it examine whether Commerzbank, PayPal, or Qonto as a whole provides a better or worse service. Such a conclusion could not in any event be seriously derived from the individual processes observed. The comparative observations therefore have a deliberately limited scope:

- **Only the function of the specifically observed process or communication characteristic and its effect on the customer's capacity to act are assessed. No general assessment of the respective provider is derived from this functional assessment.**

The decision as to the personal suitability of a service therefore remains with the individual user. A process that created additional effort for the customer examined here may be entirely sufficient or even preferable for another person.

The case study describes the observed function. It does not decide for other individuals whether that function is good enough for them.

13.13 Questions for QONTO SA

The comparative observations give rise in particular to the following questions for QONTO SA's internal perspective:

- **To what extent are Qonto processes tested with individuals who were neither involved in their development nor possess internal process knowledge?**



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- ▶ How is it examined whether a customer can directly derive the action required of them from status information or information requesting action?
- ▶ How is it tested whether information is merely available or is actually findable and assignable within the specific context of use?
- ▶ Are situations also examined in which company data or required information are not yet available, as may occur particularly with newly established companies?
- ▶ In process design, how is a distinction made between project knowledge known internally and the knowledge that can reasonably be assumed of a customer encountering the process for the first time?

These questions make no statement about how corresponding testing is actually organized within QONTO SA. Their purpose is to supplement the observed external perspective with this as-yet unknown internal perspective.

13.14 Interim Conclusion

The comparative observations involving Commerzbank and PayPal are not intended to measure Qonto against other companies or establish a ranking. They perform a different function. They make visible that comparable communicative tasks can be designed differently. This provides an additional path to insight:

- **same or comparable information need → different process design → different effect on human capacity to act**



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The conclusion derived from this is not:

- **“This is how Qonto must do it.”**

It is:

- **“This is another way in which the same communicative function can be designed.”**

Precisely for this reason, it becomes possible to examine more closely which parts of an observed burden were necessarily inherent in the matter itself and which may have been related to the specific process design. And this brings the chapter back to the individual who must actually use the system:

- **The provider knows its project. The customer knows his objective. Good process communication must connect the two.**

The individual observations made so far, the examination of workload and process guidance, and the comparative observations now make the next step possible: examining the cumulative effect of these processes on the specific customer and the decision he ultimately made about whether to continue the business relationship.

14. Cumulative Process Impact and the Customer's Decision

The preceding chapters have examined different processes within the same business relationship. Each of these processes initially has its own function and its own context. An unclear status is not the same as an unavailable account function. A question concerning a physical bank card is not the same as a question concerning value-added tax.



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An additional navigation step in a transfer is not the same as a statement concerning whether an invoice can be corrected.

For the purposes of the analysis, it would therefore be methodologically incorrect to retrospectively combine these processes into a single supposed error.

At the same time, however, they were experienced by the same customer within the same business relationship.

This creates a second level alongside the examination of each individual process:

What effect arises when the need for information, monitoring, and clarification repeatedly occurs within a business relationship?

This cumulative effect ultimately became relevant to the customer's decision about whether to continue the business relationship.

14.1 The Individual Process and the Sum of the Processes

A single additional work step may be minor.

A single follow-up question may be answered quickly.

A single unclear status may remain without significant consequences.

Even an individual process requiring more attention than expected does not necessarily give the customer reason to question a business relationship.

The effect changes, however, when similar requirements occur repeatedly.

The customer then no longer processes only the individual event.

He may begin to expect additional information or monitoring needs in subsequent processes as well.

This changes the starting point.

What begins as:

“I use a function”

can increasingly become:



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“I use a function and then check whether it worked the way I expected it to.”

This change is of particular interest to the case study.

14.2 From Reactive to Preventive Monitoring

Initially, monitoring work generally arises reactively.

- Information is unclear.
- A status leaves a question unanswered.
- A function is unavailable.
- A process requires additional clarification.
- The customer responds.

If such experiences recur, the function of monitoring may change.

The customer then no longer monitors exclusively because a specific uncertainty has already arisen.

He monitors as a precaution because he anticipates a possible uncertainty.

This creates **preventive monitoring effort**.

The distinction is:

Reactive monitoring:

A specific process creates an identifiable question.

Preventive monitoring:

Previous experiences lead the customer to check a new process as a precaution.

This second form has a particular effect on the actual effort involved in using a service.

The effort may now arise even in processes that function entirely correctly from a technical perspective and without any further disruption.



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14.3 Trust as a Functional Resource

In this context, trust acquires a specific process function.

Trust here does not mean liking a provider.

Nor does it mean that a customer should dispense entirely with monitoring.

Within the context examined, trust performs a practical function:

The individual can release a completed process from their attention without having to continue monitoring it as a precaution.

Where this trust exists, unambiguous system feedback may be sufficient.

Where it has diminished, the same system feedback may create an additional need for monitoring.

Trust therefore becomes a resource within process use.

It reduces attention, monitoring work, and the need for clarification.

The loss of this trust can accordingly increase the actual effort involved in using a service even where its technical functions remain available.

14.4 Functional Resolution and Restoration of Trust Are Not the Same

Several of the functional restrictions or uncertainties observed during the process were subsequently removed or clarified.

The account was fully activated.

Individual functions subsequently became available.

Information was explained retrospectively.

The remaining balance could ultimately be transferred successfully.

These functional outcomes are expressly taken into account in the case study.



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Their restoration, however, does not necessarily mean that the preceding communicative effect also disappears.

Two different processes must therefore be distinguished:

functional restoration

and

restoration of trust

A technical or organizational problem may have been resolved.

The experience that the customer previously had to research, monitor, or ask follow-up questions remains an experience.

For the specific customer, therefore, the decisive question increasingly became not merely:

“Does it work now?”

but:

“What effort of my own must I expect in the future in order for it to work – or in order for me to recognize that it is working?”

14.5 The Decisive Effect Did Not Lie in a Single Event

The decision to end the business relationship therefore did not arise from any single one of the documented processes.

In particular, neither the physical bank card nor an individual status, an individual support communication, or a single additional operating step was decisive on its own.

Nor does the amount of EUR 20.73 in French VAT alone explain the decision.

Rather, a cumulative experience developed for the customer:

- recurring information needs;



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- recurring monitoring needs;
- additional research;
- need for clarification;
- attention being tied up; and
- the expectation that future processes might likewise have to be actively accompanied or checked.

The customer's personal cost-benefit assessment of the service thereby shifted.

14.6 Fee and the Customer's Own Effort

This development is significant against the background that the service was purchased for a fee.

The customer paid to use the business account.

At the same time, additional work arose on his side.

As already developed in Chapter 11, the actual economic effect therefore cannot be determined solely from the account price.

For the purposes of the case study, the analytical model is:

account price + own administrative effort + monitoring and clarification effort + consequences of disruptions + working time consumed = actual effort of the banking relationship

No attempt is made to retrospectively convert every minute into a monetary amount.

What matters is the function of this analysis.

Working time spent on research, monitoring, or clarification is not simultaneously available for the customer's or ICD's actual work.

Work that is not invoiced therefore also has economic value.



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14.7 The Decision Is the Customer's Decision

From this cumulative experience, the customer ultimately drew a personal conclusion.

He decided not to continue using the Qonto business account as his business banking relationship and to end the business relationship.

This decision is not an assessment of QONTO SA as a company.

Nor does it imply that the service is unsuitable for other customers.

It answers exclusively one question for the specific customer:

Does the observed functionality of this service meet my requirements sufficiently for me to want to continue the business relationship?

The customer answered this question for himself in the negative.

Another customer may reach an entirely different conclusion based on the same functions, different experiences, or different requirements.

The case study does not claim to make that decision for them.

The termination of the business relationship is therefore itself an expression of the **capacity to act** that is the subject of this analysis.

The customer observes a service, experiences its effects, weighs his own effort and benefit, and then decides for himself whether he wishes to continue using it.

14.8 Practical Implementation of the Decision

On September 9, 2026, the decision was implemented in practice.

The remaining balance was transferred to the new business account.

The Qonto account subsequently had no remaining balance.

The business banking details in the relevant documents were changed to the new account.

The switch was therefore no longer merely a consideration or intention.



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It had been implemented in practice.

The formal termination of the business relationship must be distinguished from this as a separate administrative process.

For the case study, however, the actual transfer of business use is already significant.

14.9 The Switch as a Process Effect, Not a Sanction

The switch of the business account is not understood in this case study as a sanction against Qonto.

It is intended neither to punish the company nor to compel it to respond in a particular way.

Rather, it is an observable consequential effect of the overall process under examination on the specific customer.

The decision itself therefore forms part of the subject of the analysis.

The chain is:

**process experience → recurring personal effort → cumulative effect →
personal assessment → decision → switch**

This presentation contains no judgment as to whether another individual in the same situation should have made the same decision.

It merely documents how the decision arose in this specific case.

14.10 The Decision Was Made Before QONTO SA's Concluding Internal Perspective

For the methodological classification, it is also significant that the customer's decision was not made dependent on a later concluding statement from QONTO SA.

This does not contradict the invitation to QONTO SA to contribute its internal perspective to the case study.

The two processes perform different functions.



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The customer's decision answers:

“Do I want to continue using this service?”

QONTO SA's statement, by contrast, is intended to answer:

“What happened within the processes from the provider's perspective, and what previously unknown relationships may supplement or explain the documented external perspective?”

The statement may therefore substantially expand the scientific analysis.

It no longer has to determine, however, whether the business relationship will continue.

14.11 A Later Explanation Does Not Change the Information Available at the Time

A later explanation by QONTO SA may reveal relationships that were previously unknown.

It may show why a particular process was necessary.

It may resolve misunderstandings.

It may correct assumptions.

It may explain internal procedures that were unknown to the customer at the relevant time.

It therefore has considerable value for the case study as a source of insight.

It does not, however, retrospectively change the information that was actually available to the customer at the respective moment.

If the customer could not determine on July 19 which additional information was required, a later explanation may explain why this occurred.

It cannot retrospectively cause the customer to have already possessed that information on July 19.

Both perspectives therefore remain valid subjects of analysis at the same time:

What happened internally?



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and

What could the customer recognize at the time?

It is precisely the difference between these two perspectives that may be particularly revealing from a scientific perspective.

14.12 Observation Rather Than Retrospective Justification of the Decision

The case study is not intended to retrospectively justify the customer's decision.

There is no need to do so.

A customer does not have to prove scientifically that a service is no longer personally suitable for them.

Nor does the study have to demonstrate that termination was the only reasonable or objectively correct response.

The analytical value lies elsewhere.

The decision marks the point at which the cumulative effect of the observed processes became practically relevant for this customer.

The decision thereby becomes an observation in its own right:

The customer did not stop using the service because of a single documented event, but after recurring needs for information, monitoring, and clarification had changed both his own level of effort and his expectations of future processes.

14.13 No Generalization

No statement about general customer satisfaction at Qonto is derived from the customer's decision.

Nor can any conclusion be drawn from it concerning the experiences of other companies, the overall technical quality of the service, or the general suitability of the business model.



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The case study examines one specific course of events.

Its value as a source of insight lies precisely in examining that course in detail.

An individual case can make mechanisms visible.

It can generate questions.

It can clarify relationships.

It can provide reason to examine particular process functions more closely.

It does not, however, permit the observed effect to be transferred to an entire population of customers without further basis.

The scope of the analysis therefore remains deliberately limited.

14.14 End of the Customer-Related Process Observation

With the transfer of the balance and the business banking relationship, the active customer-related observation of the Qonto account is essentially complete.

The function of the subsequent analysis now changes as well.

Up to this point, the case study was able to observe continuously:

- What does the system display?
- What information does the customer receive?
- What action follows from it?
- What effect arises?

Following the decision to end use of the account, another perspective comes to the forefront:

How does QONTO SA explain the documented processes from its internal perspective?

The analysis therefore does not end.

Only one of its observational perspectives comes to an end.



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14.15 Interim Conclusion

The decision to switch business accounts was not a spontaneous reaction to a single process.

It developed from the repeated experience that the customer had to monitor processes, research information himself, and follow up on uncertainties.

With the transfer of the remaining balance and the change in the business banking relationship, this decision was implemented in practice.

QONTO SA's subsequent statement therefore no longer serves to determine whether the business relationship will continue, but exclusively to supplement the case study factually with the company's internal perspective.

This also reveals one final important distinction:

The functional resolution of a problem and the effect that the preceding process has left on the individual are not the same thing.

In the specific case, the functional disadvantages were ultimately resolved.

For the customer's decision, however, the decisive factor was that the repeated need for his own research, monitoring, and clarification had changed his expectations concerning future use of the service.

The case study does not assess this decision as right or wrong.

It documents it as an effect of the observed process.

Every user remains free to decide whether the way a system functions meets their own needs and expectations.



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15. Open Questions and QONTO SA's Statement

The preceding chapters describe the course of events under examination from the customer's perspective and analyze the function of the communication and process characteristics observed along the way. This perspective has a natural limit.

The customer can observe:

- **what information reaches him;**
- **what functions are available to him;**
- **what actions are required of him;**
- **what possibilities for action are recognizable to him; and**
- **what effect the process has on him.**

He cannot, however, readily determine:

- **what internal processing steps take place;**
- **what technical or regulatory dependencies exist;**
- **what organizational units are involved;**
- **what decisions are prepared or executed automatically; and**
- **what reasons underlie a particular process design.**

This information belongs to QONTO SA's internal perspective.

The case study does not replace this lack of knowledge with assumptions. It therefore expressly submits to QONTO SA the questions that have arisen from the external perspective.



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15.1 Two Perspectives on the Same Process

A digital process may appear differently from the provider's and the customer's perspectives at the same time. QONTO SA knows what it intended, what internal procedures are provided for, and what actually happens within its systems. The customer, by contrast, knows what information reaches him and what possibilities for action become apparent to him as a result. Both perspectives describe different parts of the same process.

For the analysis, there is therefore no need to set one perspective against the other. It is precisely their juxtaposition that may generate insight. QONTO SA's statement is therefore not intended merely to "respond" to points of criticism. It is intended to add the perspective that has so far been missing:

- **What happened within the system while the customer was observing the documented processes from the outside?**

15.2 Account Opening and Full Activation

At the beginning of the account-opening process, the customer received clear information about the required documents, payment of the share capital, and the subsequent process. Later, however, information and clarification needs arose concerning the processing status and the steps still required.

Following a formal request for clarification on September 3, 2026, the account was validated on the same day. The following day, the Commercial Register extract was taken into account and the full range of functions was activated. From the external perspective, it is not apparent what internal reviews had previously taken place or what prerequisites had to be fulfilled for the individual steps.



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This gives rise in particular to the following questions:

- **What processing and review steps took place between submission of the required formation documents and full activation of the account?**
- **Which of these steps depended on one another?**
- **What information concerning the respective processing status could have been made available to the customer during this period?**
- **What influence did the request for clarification of September 3 have on the subsequent process, or was there merely a temporal relationship between the inquiry and the subsequent activation?**

The case study expressly draws no conclusion from the temporal proximity regarding a causal relationship.

15.3 Request to Provide Additional Information

On July 19, 2026, the customer was informed that additional information was required. The possible consequence of failing to provide it was identified, and a technical means of submitting the information was provided. From the communication concerned, however, the customer could not immediately determine which specific information was missing.

This gives rise to the following questions:

- **What specific information was required at that time?**
- **Was this information already clearly known to the system?**
- **If so, why was it not specifically identified in the request?**
- **If not, what function did the request to provide additional information perform?**



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- **How is a customer within this process supposed to recognize what action is expected of him?**

Of particular interest here is the connection between the internal need for information and the external request for action.

15.4 Status Information and Recognizable Process States

At various points in the analysis, it became apparent that technically accurate status information does not necessarily answer all questions relevant to the customer's next action. This is not a demand for maximum information.

A customer does not need to know internal processes in full.

He does, however, need sufficient information to recognize:

- **Do I need to act?**

or

- **Do I need to wait?**

This gives rise to the following questions:

- **According to what criteria is the status information displayed to the customer selected?**
- **Is a distinction made between internal system status and the action status relevant to the customer?**
- **How is it assessed whether a displayed status enables the customer to recognize whether action on his part is required?**
- **How is completion of a process step performed by the customer made recognizable?**



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15.5 SEPA Direct Debit

In the analysis of SEPA direct debit, the customer could initially recognize that the function was “currently unavailable.” Less immediately apparent were the prerequisites under which it would become available and the significance of the creditor identifier within that process.

The case study does not question that objectively or legally necessary prerequisites may exist for certain functions. It asks how those prerequisites are communicated.

This gives rise in particular to the following questions:

- **What prerequisites must be fulfilled in order to use the SEPA Direct Debit function concerned?**
- **What role does the creditor identifier perform within the specific Qonto process?**
- **At what point are these prerequisites explained to the customer?**
- **How is a customer supposed to infer from the indication “currently unavailable” whether he can do something himself or merely has to wait for a further process step?**
- **What support is provided where the customer lacks the process knowledge required for use of the function?**

15.6 Physical Bank Cards

The physical bank card forms part of the scope of delivery of the selected account plan. In the process under examination, a card status was displayed to the customer that did not, however, immediately reveal the status of the physical production or delivery process.



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Delivery of the card was neither the cause of the later decision to end the business relationship nor the subject of a separate complaint. Because that decision followed shortly afterward, the subsequent course of delivery could no longer be meaningfully observed.

For the functional analysis, however, the following questions remain:

- **What does the displayed status “Active” mean within the card process?**
- **How is a distinction made between the functional status of a card and its physical production or delivery status?**
- **What information does a customer receive as to whether a physical card has already been produced or shipped?**
- **How is it made apparent to the customer whether he needs to act or merely wait for delivery?**

15.7 Invoice and French Value-Added Tax

An annual invoice of EUR 124.38, including 20 percent French VAT, was issued for the selected account plan. At the time the invoice was issued, the newly established company did not yet have the corresponding VAT identification number.

During the subsequent clarification process, it was explained that different tax treatment would have applied if a valid EU VAT identification number had been on file at the relevant time. At the same time, the customer was informed that an invoice already issued could not be corrected.

Chapter 9 deliberately distinguished between the general process rule, the tax treatment, and the question of whether a specific invoice could be corrected.



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For the internal perspective, this gives rise in particular to the following questions:

- **What information do newly established companies receive before their first invoice concerning the significance of a VAT identification number that has not yet been issued?**
- **Does the process provide a way to reflect the particular transitional status of a newly established company?**
- **On what specific basis is the statement made that an invoice already issued cannot be corrected?**
- **Does this represent a technical limitation, an internal business rule, a tax-law assessment, or another requirement?**
- **Was the specific case of ICD gUG individually reviewed?**
- **What possibilities for correcting an invoice generally exist where, after the invoice has been issued, it becomes apparent that individual invoice components require correction?**

These questions do not presuppose that the specific invoice necessarily had to be corrected. Their purpose is to clarify the function and basis of the statement communicated in the specific process.

15.8 Transfer and Recognizable Choice of Execution Method

During the transfer of the remaining balance, a transfer process was initially opened that required entry of a BIC. As the process continued, the customer was instructed to use a SEPA transfer for the German bank details concerned.

The transfer was subsequently completed successfully and was ultimately processed as an instant transfer.



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For the analysis, however, it remained unclear at what point a conscious choice between different methods of execution was provided for.

This gives rise to the following questions:

- **According to what criteria does Qonto guide the customer toward a particular transfer process?**
- **What function does the BIC request perform within the process initially selected?**
- **If the customer selects a process unsuitable for the specific transaction, is he taken directly to the appropriate function or must he locate it himself?**
- **What execution methods are available for a corresponding SEPA transfer?**
- **At what point can the customer choose between them?**
- **What differences relevant to his decision are displayed?**

Again, no specific technical design is prescribed.

The subject of the analysis is the function of the recognizable possibility for choice.

15.9 Automation, AI, and Recognizability

Chapter 12 deliberately did not treat automated or AI-supported communication primarily as a question of technology. What matters is the function performed within the process. During the course examined, the designations “Operator,” “Aleksandra,” “Zlatan B.,” and “Martha C.” appeared, among others.

From the documented external perspective, it is not possible in every case to determine unambiguously what function these communication partners or designations performed within the process and whether, or to what extent, automated or AI-supported systems were involved.



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The case study does not present any assumption about this as fact. It asks:

- **Which of the communication channels used in the process under examination were supported by automated or AI-supported systems?**
- **In which processes, if any, did the customer interact directly with an AI system?**
- **What functions do the designations “Operator,” “Aleksandra,” “Zlatan B.,” and “Martha C.” perform within customer communication?**
- **How is it made recognizable to the customer whether he is communicating directly with a human being or an AI system?**
- **How is professional responsibility assigned for statements that open or exclude a specific course of action for the customer?**
- **What possibilities exist for submitting such a statement to human professional review?**

Answering these questions could make a significant contribution to comparing the chain developed in Chapter 12:

- **recognizability → function → competence → responsibility → capacity to act**

with the actual process design.

15.10 Outside-the-Project Customer Perspective

The recurring observations concerning information, orientation, and monitoring needs led in Chapter 13 to the question of the extent to which digital processes are examined from the perspective of individuals who do not know their internal logic.



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The case study does not know how corresponding testing is carried out within QONTO SA.

This gives rise to the following questions:

- ▶ **To what extent are Qonto processes tested with individuals outside the project?**
- ▶ **How is it ensured that internal project knowledge is not unconsciously assumed to be customer knowledge?**
- ▶ **Are complete chains of action examined from the customer's perspective, or only individual functions or interfaces?**
- ▶ **How is it tested whether a customer can recognize after a process step whether his task has been completed?**
- ▶ **Are different cognitive conditions and different forms of information processing taken into account?**
- ▶ **How do observations from such testing feed into subsequent process design?**

Again, the case study does not assert that testing is absent or inadequate.

These questions arise from the observed external perspective.

15.11 Criticism and Functional Resolution of Problems

During the business relationship under examination, functional disadvantages or restrictions were ultimately removed. This is expressly documented in the case study.

At the same time, removing the specific disadvantages did not fully restore the trust that had previously been affected on the customer's side.



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For the analysis, this gives rise to a broader communication question:

- **How does a company deal with criticism once the specific functional disadvantage has been resolved?**

For QONTO SA, this gives rise in particular to the following questions:

- ▶ **How are customer reports of recurring information, monitoring, or clarification needs processed internally?**
- ▶ **Is a distinction made between resolving the specific functional problem and engaging with the underlying criticism?**
- ▶ **How is it assessed whether a functional solution also takes into account the communicative effect of the preceding process?**
- ▶ **What possibilities exist for using insights from a specific customer experience to further develop processes?**

These questions do not demand any particular response.

They examine the function that criticism can perform within a learning system.

15.12 The Statement Can Explain Observations, Not Retrospectively Change Them

QONTO SA's statement may have considerable value as a source of insight for the case study. It may explain previously unknown process relationships. It may show that individual steps were technically, regulatorily, or organizationally necessary. It may correct assumptions. It may provide additional information. It may also show that an uncertainty perceived by the customer had an understandable background from another perspective. This may change the way a process is classified.

What cannot change, however, is the customer's historical information situation.

An explanation provided today cannot make information that was unavailable at the time retrospectively available.



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The final case study must therefore preserve both levels:

- **the documented external perspective at the time; and**
- **QONTO SA's subsequently added internal perspective.**

A possible difference between the two is not a methodological problem.

It is itself a subject of inquiry.

15.13 Statement Rather Than Justification

By inviting QONTO SA to provide a statement, the case study does not require the company to justify itself. The study does not assume that the company bears a burden of proof toward ICD. Nor does QONTO SA have to disprove the customer's personal decision to end the business relationship.

That decision has already been made and implemented in practice. The statement performs a different function:

- **It is intended to supplement the external perspective documented so far with information that is available exclusively or primarily to QONTO SA.**

This gives the company the opportunity to:

- **add facts;**
- **explain relationships;**
- **make unknown dependencies visible;**
- **comment on ICD's professional assessments; and**
- **where appropriate, correct factual assumptions.**



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The scientific function therefore does not consist of defense and counterattack.

It consists of **adding perspective**.

15.14 Dealing With Different Assessments

It is possible that QONTO SA will classify individual observations or conclusions differently from ICD. This would not constitute an obstacle to the case study either. Different assessments can be documented alongside one another, provided that their respective origin remains recognizable.

For example:

- **customer observation**
- **ICD assessment**
- **QONTO SA explanation**

Such a structure does not require any of the perspectives involved to adopt the other. Rather, it enables the reader to understand where agreement exists and where different perceptions or professional assessments remain.

The study thereby follows its own principle of communication:

- **The objective is not to make one perspective prevail. The objective is to make the perspectives visible and comparable with one another.**



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15.15 The Deliberate Gap

Until QONTO SA provides its statement, the analysis therefore deliberately remains incomplete at several points. This gap is not a defect in the case study. It is an expression of its methodological limitation.

Where the customer could not observe an internal process, it is not reconstructed.

Where the function of a system was not clearly recognizable, it is asked about.

Where a cause is unknown, no cause is asserted.

Where different explanations are possible, none is declared fact without a sufficient basis.

The principle is:

- **Lack of knowledge about internal processes is not replaced by assumptions.**

This also makes visible which information is still missing for a more complete understanding.

15.16 Invitation to QONTO SA

QONTO SA is expressly invited to comment on the processes documented in this case study and the questions arising from them. There is no requirement to adopt the structure or assessments of the case study. Of particular interest are precisely those pieces of information that were not accessible from the customer's perspective.



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These include in particular:

- **internal process relationships;**
- **professional responsibilities;**
- **technical dependencies;**
- **regulatory requirements;**
- **functions of automated or AI-supported systems;**
- **reasons for particular information and process designs; and**
- **where applicable, differing professional assessments.**

An appropriate statement will be duly taken into account in the final version of the case study. A distinction will be maintained between the originally documented external perspective and the information subsequently obtained.

- **The internal perspective is intended to supplement the external perspective, not overwrite it.**

15.17 Interim Conclusion

With this chapter, the analysis reaches a methodological boundary. The customer-related observation is essentially complete. Some of the questions arising from that observation can be answered only by QONTO SA.

The case study therefore currently consists of two perspectives with different degrees of completeness:

- ▶ **The external perspective is documented.**
- ▶ **The internal perspective is still outstanding.**



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This is no reason to weaken the insights obtained so far.

Nor is it a reason to replace the missing perspective with assumptions of our own.

Rather:

- **QONTO SA knows what it intended and what actually happened within its processes. The customer knows what information reached him and what effect those processes had on him.**

Only by placing both perspectives alongside one another can the analysis proceed further into what occurred between system and individual.

Until then, the gap remains visible.

- **Lack of knowledge about internal processes is not replaced by assumptions.**

16. Preliminary Conclusion – As of September 9, 2026

16.1 Starting Point of the Analysis

This case study began with a comparatively simple observation:

A digital process that is fundamentally functional from a technical perspective may nevertheless involve considerable information, monitoring, and clarification effort for the individual.

As the analysis progressed, it became apparent that the technical execution of individual functions is not the only factor that matters.



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Equally important is whether the individual can recognize:

- **what is happening within a process;**
- **what significance a piece of information has for them;**
- **whether action is expected of them and, if so, what action;**
- **when an action has been successfully completed;**
- **when no further action is required; and**
- **whom they can contact if the intended process does not adequately reflect their specific case.**

The analysis therefore increasingly shifted from individual observed processes to a broader question:

- **Does the design of a digital process enable the individual to recognize what is happening, understand its significance, and retain the capacity to act autonomously – or do avoidable obstacles arise between the system and the individual that make that capacity to act more difficult?**

This question forms the common reference point for the observations documented in this case study.

16.2 Technical Function and Human Capacity to Act

The analysis has repeatedly shown that a distinction must be made between the technical function of a system and the individual's capacity to act.

A function may be executed correctly from a technical perspective while it remains unclear to the customer what has happened or whether he still needs to take action himself.

A document may have been technically transmitted without completion of that process being clearly recognizable to the user.



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A bank card may be technically active without its delivery status being apparent from that status.

A transfer may be executed successfully from a technical perspective even though the available methods of execution were not sufficiently recognizable to the customer.

Information may be factually correct and nevertheless be insufficient to identify the next required action.

This gives rise to a distinction that is central to the case study:

- **Technical functionality and human capacity to act are not identical.**

From a human perspective, a digital process is therefore not fully described merely by establishing that its technical function was performed correctly.

Communication between system and individual is also part of its function.

16.3 Accessibility as a Quality of the Process

Accessibility has been understood in this case study neither as an entitlement to special treatment nor as a demand for the greatest possible simplification. Human beings have different abilities. Not every difficulty is therefore a barrier, and not every form of complexity can be avoided. The decisive question is instead where a difficulty originates.

Is it a necessary part of the task, or does it arise additionally from the design of the system?

This distinction is essential.

Necessary professional or technical complexity does not become a barrier merely because an individual has difficulty with it. If, by contrast, additional information, orientation, or



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clarification effort arises even though it could have been avoided through a different process or communication design, the design itself becomes the subject of analysis.

The neurodivergence of the customer observed in this case study establishes neither a special standard nor an entitlement to an individually tailored process. It does, however, make it possible to observe that open process states, recurring clarification needs, and communication loops that are not clearly concluded can create increased cognitive burden and stress. Precisely this effect may provide indications of where a process creates avoidable obstacles.

Accessibility therefore does not mean eliminating human differences.

- **The objective is not the simplest conceivable process. The objective is a process without avoidable obstacles.**

16.4 Self-Service, Digitalization, and Actual Efficiency

Another central focus of the analysis was the question of what work is actually eliminated through digitalization and what work is merely shifted elsewhere. Self-service necessarily means that the customer performs certain activities himself. This **usage work** forms part of the chosen model and is not in itself to be regarded as a disadvantage. It must be distinguished from **additional process work** that becomes necessary in order to understand the state or logic of the system itself, search for information, monitor unclear process states, or obtain additional clarification.



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The analysis therefore led to the distinction:

- **Usage work serves to carry out the desired task.**
Additional process work serves to cope with the system through which that task is to be carried out.

For the assessment of the actual efficiency of a digital service, it is therefore not sufficient to consider exclusively its technical processing speed or degree of automation.

From the customer's perspective, his own expenditure of time, information, monitoring, and clarification effort also forms part of the actual effort required to use the service.

This gives rise to a broader question:

- **Who actually performs the work in a digital financial process – the system or the customer?**

For the customer, digitalization becomes an increase in efficiency only when it not only automates work but also reduces his information, monitoring, and clarification effort.

16.5 Learning Systems and Human Diversity

Increasing automation and the use of learning systems considerably expand the technical capabilities of digital services. At the same time, this creates a remarkable tension between objectives. A conventional technical system has limits determined substantially by its design and its intended functions.

Further improvements in customer interaction often arise through the experience of the people involved. Employees encounter different customers, situations, and deviations and can adapt their behavior accordingly.



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Learning systems, by contrast, create the possibility of continuously developing the technical side as well. Precisely for this reason, problems, deviations, and unexpected human reactions have particular value as sources of insight.

A process optimized exclusively for speed, standardization, and an idealized sequence may increasingly treat human deviations as disruptions to its own process logic.

For the individual, however, these deviations are not system errors. They are expressions of their individuality, their abilities, their circumstances, and their specific concerns.

This creates a paradox:

- **The more capable a digital system becomes, the greater the temptation may become to adapt the individual to the logic of the system. Yet it is precisely the system's capacity to learn that creates the opposite possibility: the system can learn to deal better with human diversity.**

From this perspective, problems acquire an additional function. They are not merely disruptions that need to be eliminated. They can provide information about where the existing process design reaches its limits. If such observations are examined, they can generate insight and change. If they are ignored or denied, this opportunity for learning is not used.

- **An identified problem is not proof that a system has failed. It is a prerequisite for a system to learn and improve.**

The highest stage of development of a learning system would therefore not be reached when the individual has learned to adapt as seamlessly as possible to its process logic. It would be reached when the system has increasingly learned to deal with human diversity.



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16.6 AI, Process Guidance, and Responsibility

The case study assesses AI neither as fundamentally positive nor fundamentally negative. What matters is its function within a specific process. AI can serve as a tool within a process designed and responsibly managed by human beings. It can structure information, identify relevant circumstances, prepare decisions, and support communication.

A different quality arises where the technical process logic itself determines which possibilities are available to the individual and when an individual case is treated as having been finally decided. This gives rise to the chain developed in this analysis:

- **recognizability → function → competence → responsibility → capacity to act**

For the individual, it must remain comprehensible what function they are communicating with, what significance a statement received has, and where responsibility for a decision lies.

Two levels must be distinguished here:

- **Verifiability protects the capacity to act and the capacity to exercise legal rights. Human relationship influences the quality of communication.**

The technical capability of a system therefore does not replace the question of responsibility. Nor does human involvement have to limit the benefits of technical systems. What matters is how the two are connected.



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16.7 Comparative Observations Without Assessing Providers

The comparative observations involving other financial service providers used in this case study are not intended to create a ranking or to make a general assessment of the companies involved. They merely demonstrate that comparable communicative tasks can be designed differently and can therefore have different effects on the customer's capacity to act.

- **Only the function of the specifically observed process or communication characteristic and its effect on the customer's capacity to act are assessed.**

No general assessment of the respective provider is derived from this functional assessment. The comparative observations therefore perform an epistemic function:

- **This is another way in which the same communicative task can be designed.**

Whether a particular service is good enough for an individual user can ultimately be decided only by that user according to their own requirements.

16.8 The Outside-the-Project Perspective

A provider knows the processes it has developed, their objectives, and their internal logic. The customer does not initially know this logic. The customer knows his own objective. It is precisely this difference that gives the **outside-the-project perspective** its particular significance.



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What appears self-evident within a project does not necessarily appear self-evident to an individual outside that project. Information may appear unambiguous internally and nevertheless create an additional need for clarification for the recipient.

The case study does not replace missing knowledge about internal processes with assumptions. The recurring observations do, however, give rise to the question of the extent to which digital processes are considered from the perspective of individuals who know neither how those processes were created nor their internal logic.

- **A digital system must not only function within its own logic. It must function for the individual who does not know that logic.**

16.9 Cumulative Impact and the Customer's Decision

None of the individual processes documented in this case study was, on its own, decisive for the decision to end the business relationship. What mattered was the cumulative effect of recurring information, monitoring, and clarification needs.

As experience accumulated, the customer's behavior also changed. Reaction to specific uncertainties increasingly developed into preventive monitoring of subsequent processes. This tied up attention, even though from the customer's perspective a digital self-service service should reduce work and attention. The functional resolution of individual disadvantages did not automatically restore the trust that had previously existed. In this context, trust itself performs a functional role:

- **It enables the individual to release a completed process from their attention without having to continue monitoring it as a precaution.**



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On September 9, 2026, the decision to switch business accounts was implemented in practice. The remaining balance was transferred and the business banking details were changed accordingly. This decision represents neither a sanction nor a general assessment of QONTO SA. It documents the specific effect of the processes examined on this customer's decision.

16.10 The Internal Perspective Still Missing

With the completion of the customer observation to date, one side of the communication process under examination has largely been documented.

The other side is still missing. QONTO SA knows the objectives of its processes, its internal procedures, and the reasons for their specific design. This information cannot be reconstructed from the external perspective of the customer and ICD. QONTO SA was therefore expressly invited to contribute its perspective. Such a statement serves neither to justify nor to refute the customer observation. It may explain, supplement, and, where appropriate, correct assumptions or assessments made by ICD. It cannot, however, retrospectively change what information was available to the customer at the relevant time or what effect the communication had on him at that time.

Two competing truths therefore do not stand opposed to one another.

Different perspectives on the same process stand alongside one another:

- **customer observation → ICD assessment → QONTO SA explanation**

Only by connecting them can a more comprehensive understanding emerge of what occurred between system and individual.



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16.11 Criticism as Part of a Learning Process

This case study does not understand criticism as opposition to a company or its technical systems. It understands criticism as information about an observed effect. Criticism can therefore become part of a learning process.

A learning system requires information about deviations. A learning organization requires the willingness to perceive such information, examine it, and, where appropriate, translate it into change.

This can create a cycle:

- **observation → insight → processing → change → renewed observation
→ learning**

An organization does not have to adopt ICD's assessment. It may explain why a process was designed in a particular way. Such an explanation may, in turn, provide insights that lead ICD to reassess its own evaluation. Likewise, an organization may change a process in response to the effect described and then examine again what effect that change has on the individual.

Criticism and learning therefore do not become opposites.

On the contrary:

- **Those who examine a problem create the possibility of solving it. Those who ignore or deny a problem do not protect the system from the problem – they protect the problem from its solution.**

This insight is of particular importance for learning technical systems.



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The capacity of a technical system to learn can realize its potential only where the organization is also willing to allow insights, enable change, and examine the effects of that change again.

16.12 Preliminary Conclusion

As of September 9, 2026, the analysis is largely complete with regard to the observable customer perspective. It did not seek a general answer to whether Qonto is a good or bad business account, whether fintechs are superior to traditional banks, or whether AI represents a positive or negative development. Those questions were not the subject of the analysis.

The analysis examined what happens **between a digital system and an individual who uses that system**. It repeatedly became apparent that technical functionality, speed, and automation alone do not yet guarantee human capacity to act. At the same time, it is precisely the learning capacity of modern systems that offers a possibility for development extending far beyond conventional automation.

- **The individual does not always have to become better at adapting to the system.**
- **The system can learn to deal better with people.**

For this to happen, however, precisely those pieces of information that point to difficulties, deviations, and unexpected effects must be allowed to enter the process. In this sense, ICD does not regard this case study as the conclusion of a judgment, but as a contribution to a possible process of gaining insight.



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QONTO SA's statement may supplement the current state of knowledge. It will then be necessary to examine what conclusions follow from bringing both perspectives together. Until then, the fundamental finding underlying this case study remains:

- **One side knows what it intended. The other side knows what reached it. Only when both perspectives become visible can we examine what happened between them.**

Communication is Dignity

Dignity begins where nobody owns the conversation.

Neustadt, September 9, 2026