

The complaint

Mr R complains he could not change his email address with Kroo Bank Ltd via its app. Kroo then rejected the identification documents he uploaded, causing Mr R distress and inconvenience.

What happened

Mr R explained he needed to change the email address Kroo held for him. He said it wasn't possible to do this on the Kroo app so started an online chat. Mr R explained Kroo told him it would send an email to his current email address advising what he needed to do.

Mr R said the email asked him to provide a copy of his passport and a photograph of his face, which he did. Mr R explained Kroo told him the scan of his passport he provided was not valid, and it needed to be a photograph. Mr R said he then tried to do this on his mobile phone, but due to file size restrictions, couldn't upload the photograph.

Mr R explained he has changed his email address with several other banks without issue or difficulty. Mr R explained he thinks Kroo is *'interpreting the protocols of security to such a degree that supplying banking services is thwarted'*.

Kroo responded to Mr R's complaint, explaining it had strict security measures, including verification of identity processes, when a customer requests to change an email address. Kroo apologised it couldn't accept the scanned copy of Mr R's passport, but said its policy requires a *'live photograph'* of such documents. Kroo apologised for the unnecessary stress the process had caused, but did not uphold Mr R's complaint.

Our investigator didn't think Kroo needed to take any action. They recognised the process must have been frustrating for Mr R but explained we cannot ask businesses to change such procedures.

Mr R disagreed with our investigator's recommendation, so his complaint has been passed to me to make a final decision.

What I've decided – and why

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

I appreciate how strongly Mr R feels about his complaint. Although I may not mention every point raised, I have considered everything but limited my findings to the areas which impact the outcome of the case. No discourtesy is intended by this, it just reflects the informal nature of our service.

I think it might be helpful if I first explain our services role in complaints which involve business processes. How financial businesses choose to operate and the systems and processes they have in place are commercial decisions the business is entitled to make. These decisions are not something our service considers as part of a complaint. These are matters for the regulator, the Financial Conduct Authority (FCA).

Our role isn't to punish or regulate businesses, instead where we find a business has done something wrong, we aim as far as possible to put the consumer back in the position they would have been in had the mistake or error not occurred. So, we focus on if something has gone wrong and if so, the impact this had on the customer.

Kroo's help section explains *'please note that you will not be able to update your registered name or email directly in the Kroo app.'* It explains customers need to contact Customer Support to do this. I can also see from the information on its website Kroo requires customers to submit images and identification through the app to open an account with it. I'm therefore satisfied the process Kroo has in place for changing an email address is not inconsistent with its other processes.

I can appreciate from the information Mr R has provided the process described has been frustrating for him. I can also see Mr R has recently told our service he has still not updated his email address with Kroo because he has been unable to upload a photograph due to size limitations for the upload. This issue has not been addressed by Kroo in its final response to Mr R. It appears, from the final response, Mr R told Kroo he wished to close his account when complaining to it after the first attempt at uploading details, but has since changed his mind and tried to upload a photograph of his passport.

If Mr R now wishes to keep his account open, I would hope Kroo would contact Mr R with a view to assisting him in uploading the information it requires. As this issue of file size has not been dealt with by Kroo in its final response, I cannot make a finding on it here. To be clear, our service can only consider complaints where the business has had the opportunity to respond.

In relation to the initial upload, Kroo has said it asked for a *'live photograph of an ID document'*. Mr R has not disputed this was the request, explaining in his correspondence with our service Kroo asked him to supply a copy of his passport. Mr R explained he provided a scanned copy of his passport which he had stored on his computer. Kroo explaining its policy is to accept photographs of documents and whilst it apologised for not being able to accept the scan, it was complying with its policy.

I would add it is accepted and required that businesses have processes in place to ensure changes to accounts are authorised by the account holder. Whilst such processes differ from business to business, the underlying principle of confirming the customer identity before changing banking information is common industry practise. Data Protection legislation means severe penalties can be imposed on individuals and businesses that breach legislation or do not have robust processes in place to ensure compliance with such legislation.

I agree it is not unreasonable to have a verification system in place, especially for an online bank where fraudulent changes to an email address, as one of the main forms of communication, could have a significant impact on a customer.

For these reasons, I am therefore not persuaded Kroo was acting outside of its policies here. I am also not persuaded, on balance, Kroo misled or misinformed Mr R about its requirements from the evidence I have seen. I would also reiterate our service does not have the remit to ask Kroo to change these processes, which appears to be the main driver of Mr R's complaint to our service.

I appreciate Mr R is likely to be disappointed with my decision, but I trust I have explained sufficiently why I cannot uphold this complaint from the evidence I have seen.

My final decision

For the reasons I have given, my final decision is I do not uphold this complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Mr R to accept or

reject my decision before 15 April 2025.

Gareth Jones
Ombudsman