

The complaint

Miss H is unhappy that Revolut Ltd have refused to refund transactions she says she didn't authorise.

What happened

Miss H contacted Revolut on 3 November 2024 to report several transactions she didn't recognise. 15 of the transactions, totalling around £1,350, were successful but the remaining two transactions were declined due to insufficient funds. Miss R told Revolut that she was asleep at the time and received confirmation that money had left her account early in the morning. Miss R raised a chargeback but this was subsequently rejected.

Revolut have explained that the payments were made using a digital wallet which was set up using a one-time-passcode (OTP) that was sent to Miss H's Revolut mobile app. So, Revolut chose not to pursue the chargeback claim because they were satisfied the transactions were authorised.

Miss H said that she didn't remember receiving any OTPs, being contacted by a third party asking her to share OTPs or receiving notification that someone was trying to access her account. Miss H also said that her phone hadn't been lost or stolen.

One of our Investigators looked into Miss H's complaint but didn't recommend that it was upheld. The Investigator concluded that the transactions were likely authorised because Revolut had shown they were completed using a digital wallet. The Investigator wasn't persuaded that Miss H's card could have been added to a digital wallet without her participation meaning the transactions that followed were authorised.

Miss H didn't agree with the Investigator's view so it's been passed to me to decide.

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.

When deciding this complaint, I have given regard to the Payment Services Regulations 2017 (PSRs 2017).

I've seen evidence of Revolut's internal system which shows details of the disputed transactions including the payment method used. Based on this, I'm satisfied that all the payments were authenticated using a digital wallet.

But the PSRs 2017 state evidence of authentication alone isn't sufficient to show the transactions were authorised. Under the PSRs 2017, Revolut can generally only hold Miss H liable for transactions that she either made herself or authorised someone else to make. I've reviewed evidence showing the steps someone would need to complete to add a Revolut card to a digital wallet. This demonstrates that a card couldn't be added without an

OTP being inputted which means a third party couldn't have added Miss H's Revolut card to a digital wallet, without first obtaining the OTP.

In Miss H's case, Revolut have shown that Miss H's card was added to a digital wallet in early October. System records show someone was logged into Miss H's Revolut account at the time the OTP was sent and that the OTP was viewed and copied. Records also show that whoever was logged in was accessing the app using the only trusted device linked to Miss H's account.

I can see that Revolut sent two text messages to the mobile number linked to Miss H's account, the first said that an OTP had been generated and the second confirmed that Miss H's card had been added to a digital wallet. I appreciate Miss H has said she doesn't remember receiving any OTPs but the evidence shows that both messages were sent to a number which matches the one we have on file, so I'm satisfied these messages were sent to her phone.

As Miss H has no memory of receiving an OTP, her card being added to a digital wallet or the text messages that followed, I've considered the likelihood of a third party being able to obtain the OTP and add her card to a digital wallet without Miss H's knowledge and consent. The evidence shows that the OTP was retrieved from Miss H's mobile app by someone accessing the app using Miss H's mobile phone and Revolut sent text messages about the process to Miss H's registered number. As Miss H has said her phone remained in her possession, a third party would have needed to take and replace Miss H's phone without her realising. The third party would also need to have bypassed the security on Miss H's phone and Revolut app in order to access the OTP.

Alternatively, Miss H's device could have been accessed remotely. Revolut have provided evidence of an attempt to access Miss H's account from an unknown device but this connection wasn't successful. This is unusual but I'm not persuaded it changes the outcome in respect of the disputed transactions because even if the connection had been successful, it wouldn't explain how someone was able to access the OTP on Miss H's phone and mobile app.

Usually I'd expect a fraudster to utilise a compromised account quickly but I note in Miss H's case that there's a delay of around a month between Miss H's card being added to a digital wallet and the disputed transactions in November.

Overall, there's no plausible explanation for how a third party was able to obtain the OTP and register Miss H's card to the digital wallet, without her knowledge and consent. So, on balance, I think Miss H more likely than not consented to her card being added to the wallet and therefore gave consent for the transactions that followed. As a result, I'm satisfied that the disputed transactions were authorised and it's therefore reasonable for Revolut to hold Miss H liable for them.

Given I've found the transactions were authorised it follows that I don't think Revolut acted unfairly when they chose not to pursue the chargebacks.

It's clear Miss H feels very strongly about her complaint and so my decision will likely be disappointing. But, for the reasons set out above, I won't be asking Revolut to do anything further here.

My final decision

My final decision is that don't uphold Miss H's complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask Miss H to accept

or reject my decision before 6 February 2026.

Freyja Dudley
Ombudsman