



A digital service: trace the delivery, data and payment

A preparation guide for app, marketplace and online-service owners reviewing how their business actually operates in Kuwait.

01 / Trace the customer journey

Map the offer, registration, order, delivery, support, cancellation and refund. Identify the entity responsible at each step, including any business or independent service provider using the platform.

Collect the trade licence and activity description, website and app wording, customer terms, supplier agreements and the actual operational process. Descriptions should be reviewed alongside the service delivered.

02 / Map the information

List the information collected, its purpose, storage location, retention and the vendors or other parties that receive it. Include analytics, hosting, support and payment integrations.

Bring the privacy notice, consent screens and vendor agreements. Ask counsel which obligations apply to the actual activity and regulatory status; a consent checkbox alone does not settle every legal question.

03 / Follow the money

Diagram who charges the customer, who receives the funds, who holds them and how settlement reaches the service provider. Include commissions, subscriptions, deductions, refunds and chargebacks.

Gather the payment-provider agreement, merchant and platform contracts, settlement reports and refund process. Using a payment gateway does not, on its own, answer the platform's own regulatory position.

04 / Review the model, not only the terms

Identify whether the service includes a regulated activity or a sector-specific requirement. Review the contracting entity, licence, delivery model, data use and payment flow together.

List proposed product changes before launch. A change in wording should not be treated as a substitute for reviewing the activity actually carried out.

Official reference points

[CITRA / Laws and decisions](#)

[CITRA / Resolution 26 of 2024](#)

[CBK / Electronic payment services](#)

[CBK / Payment systems overview](#)

Preparation material for general information. It is not a legal opinion or a statement of compliance. Current provisions, amendments and applicability must be checked for each matter. Share sensitive documents only through a channel agreed with the office.

Photography: Sharq, Kuwait City / Azhar Munir Din, Unsplash