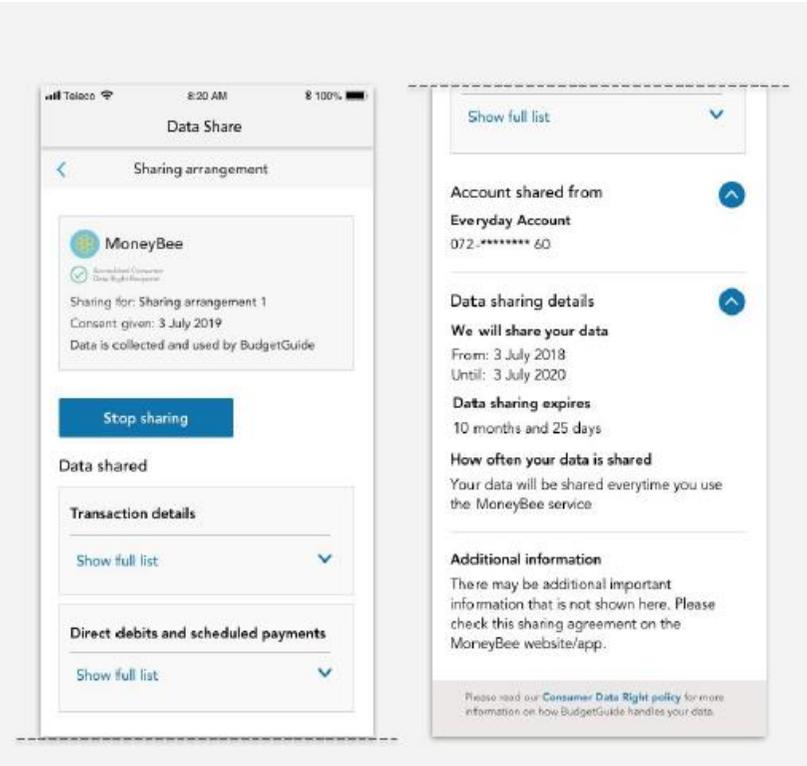


CBA Feedback: Data61 CX Guidelines – CDR Consent Management & Revocation

CX Guidelines Pg ref.	Document Section	Feedback & Clarifications sought
Pg 9		<p>The CX screen refers to <i>'How often your data is shared'</i> (although this isn't noted in the guidelines)– as raised at the CX workshop, currently the request payload does not have information about the frequency a Data Recipient intends on accessing the data. As such a Data Holder could only show a generic statement:</p> <ul style="list-style-type: none"> - In a once off scenario, <i>"Your data will be shared once"</i> - In an ongoing scenario, <i>"Your data may be shared every time you use the <DR> service, or up to 4 times a day when you're offline"</i> <p>Our recommendation is that the frequency information is included in the request payload. If not, a standardised statement based on the non-functional requirements for access should be used by the Data Holder.</p>
	<p>Guideline 4.5 Mandatory</p> <p>When the consumer has given authorisation for their data to be disclosed, the consumer dashboard must be updated to indicate what CDR data was disclosed, when this data was disclosed and the name of the data recipient.</p> <p><i>CDR Rules 1.14(3)(vii), 7.6</i></p>	<p>Guideline 4.5: <i>"Dashboard must be updated to indicate what CDR data was disclosed, when this data was disclosed..."</i> Can you clarify where this is reflected in the CX screens? Would this be the 'log' of access discussed at the workshop and referred to in Rule 1.13/14? If so, please refer to feedback below around this section.</p>
N/A	Rule section 1.13/14	As mentioned by a number of participants at the CX workshop, we believe the requirement laid out in this rule, which effectively requires

DR/DH to provide a history of when data has been accessed, is overwhelming to customers.

Our user testing has indicated that customers struggle to understand the difference between dates (for example, access/use dates, expiry date and dates covered by transactions). To add more dates to the dashboard will certainly decrease comprehension.

We have recommended that rule 1.13(3)(iv)(B) be amended to read *“how often the data has generally been, and is expected to be, collected over that period”*.

From a CX perspective this should enable DR to state more generally how often they expect to access/share data, for example *“We may access this information up to 4 times a day, or when you log on”*