

**From:** [John WHITLING](#) on behalf of [regulatoryaffairs AU](#)  
**To:** [Consumer Data Rights Data61](#)  
**Cc:** [Gunalan BHASKARAN](#); [Sandra1 POWELL](#); [Ronita ISSA](#); [Peter W QUIRK](#); [regulatoryaffairs AU](#)  
**Subject:** RE: EXTERNAL: Consumer Data Right | Consultation Draft - consent management and revocation  
**Date:** Thursday, 22 August 2019 4:58:36 PM

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Hi Data61 team,

HSBC Bank Australia Limited welcomes the opportunity to provide comments to Data61 on its Consultation draft – *CDR Consent Management and Revocation*. We have undertaken a review of the proposed revisions and write to provide our feedback.

- *Revocation – data sharing arrangement*
  - Please consider whether customers should have the ability to pause or suspend their data sharing, rather than only permitting customers to stop sharing their data.
  - We recommend that Data61 consider whether customers should have the ability to amend their existing arrangement. For example, at present when a customer wishes to add or remove specific products, their data sharing arrangement must be terminated and the data sharing consent/authorisation process repeated to add or remove in-scope products.
- *Anti-money laundering*
  - We suggest that Data61 provide clarity as to whether the data recipient has responsibility to screen the data that they are consuming.
  - HSBC would like to understand the requirements if a data holder screens the customer data and fraudulent activity is detected.
- *Mergers & acquisitions for commercial customers*
  - Please provide clarity regarding what will happen to a commercial customer's data if they go through a merger or acquisition process?
  - Would the ownership of the data be transferred or would the customer be required to terminate the sharing arrangement go through consent/authorisation again?
- *'Purpose' from data recipient*
  - The dashboard for the data recipient displays the 'purpose' of the data sharing arrangement, however we note that the 'purpose' is not displayed on the data holder dashboard – that information is not sent from the recipient to the holder. We suggest the 'purpose' should be sent to the data holder to allow this to be communicated to the customer. We believe this would provide customers with an enhanced experience.
- *Data sharing – Joint accounts*
  - Please clarify whether the requirements for joint account data sharing override the Bank's terms and conditions for Single account holder authorisation? In that scenario, a single owner of a joint account has the ability to approve all authorisations on behalf of other parties to the account.

We thank Data61 for considering our feedback and should you have any questions, please do not hesitate to contact our Regulatory Affairs team via phone (02) 9006 5648 or email [regulatoryaffairs.au@hsbc.com.au](mailto:regulatoryaffairs.au@hsbc.com.au).

Regards

**John Whitling**

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**From:** Data61 | Consumer Data Standards <CDR-Data61@csiro.au>  
**Sent:** Friday, 9 August 2019 2:41 PM  
**To:** regulatoryaffairs AU <regulatoryaffairs.au@hsbc.com.au>  
**Subject:** EXTERNAL: Consumer Data Right | Consultation Draft - consent management and revocation

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**Dear Consumer Data Right participants and other interested parties,**

On July 15 2019, [version 0.9.5 of the CX Guidelines](#) were published as part of

the Consumer Data Standards (CDS) July 2019 draft update. These guidelines covered the Consent Flow (including a specific focus on Consent, Authentication, and Authorisation).

The Consent Management and Revocation consultation draft builds on the published CX Guidelines by outlining additional guidelines specifically related to Consent Management and Revocation plus supporting examples illustrating their implementation. In particular, the draft includes: proposed dashboard components for consent management as well as a consumer flow for the revocation of consent.

**The Consent Management and Revocation consultation draft can be downloaded from the link below:**

<https://consumerdatastandards.org.au/wp-content/uploads/2019/08/Consultation-draft-CDR-consent-management-revocation.pdf>

## **Providing feedback**

### **How to give feedback**

Material from this consultation draft was presented at the [CX workshop on consent management and revocation](#) where we have received preliminary feedback from attendees. We are inviting further targeted feedback on this consultation draft, including feedback on the interpretation of the CDR Rules and comments on CX recommendations. You can provide feedback directly on our [draft guidelines consultation page](#) or via email to [cdr-data61@csiro.au](mailto:cdr-data61@csiro.au). Please include your name and organisation with your feedback as the intention is to publish all feedback on our [draft guidelines consultation page](#).

Where participants believe they have sensitive information to convey we will consider those discussions and give guidance on our preferred disclosure approach prior to meeting to discuss such issues. To discuss such issues please email us at the CDR email address: [cdr-data61@csiro.au](mailto:cdr-data61@csiro.au)

### **Deadline**

The targeted feedback window for the Consent Management and Revocation consultation draft will close on COB Thursday August 22 2019.

### **Keep in touch**

- Sign up to our [mailing lists](#)
- See our [past updates](#)
- Find other information on the [Consumer Data Standards website](#)
- View the online presence of other technical workstreams on [Github](#)
- If you would like to participate in any of our discussions across the four

streams or provide any feedback, you can do so via email to [cdr-data61@csiro.au](mailto:cdr-data61@csiro.au).

Best regards,

The CX Workstream

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