

**From:** [Aaron Orellana](#)  
**To:** [Consumer Data Rights Data61](#)  
**Subject:** Re: Consumer Data Right | Consultation Draft - consent management and revocation  
**Date:** Thursday, 22 August 2019 3:33:14 PM  
**Attachments:** [Consultation draft - Consent management and revocation - NAB Feedback.pdf](#)

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Hi all,

See attached for our feedback, below is our summary.

- Great work on creating guidelines that are easy to consume, and thoroughly documented. It's a great step towards creating consistency for consumers.
- To ensure consistency for consumers, NAB requires that Holders and Recipients **show the same information in a consent arrangement and show that information consistently**. This is even more critical for joint account and business scenarios in which a secondary account holder will have the added context of the sharing arrangement to make an informed decision.
- The **Data Language Standards must be extended** to include terms for all consent stages and actions for managing the consent, not just the clusters. This is something that should be enforceable to drive consistency across all participants for consumers.
- The inconsistency in standards don't allow DHs to have visibility of the '**consent to de-identify** data during data sharing'.  
It's important to share the same consent details in both DR and DH to **ensure a consistent experience for the consumer**.

#### Questions that we would like answered

- What is the intention going forward with **granular consent? We require clarity and alignment from CX guidelines and technical standards** to move forward with build. Given this remains unresolved, then it will need to be a requirement for later phases.
- **Downloading the records of consent data collected** - This is outlined as a rule (CDR rules, 9.5); we haven't seen any discussion around this and remains an outstanding issue. It's unclear how we can meet our compliance obligation in relation to this rule. We would like to see when this will be addressed.

Kind Regards,

**Aaron Orellana**

Senior UX Designer, Experience Design  
Customer Experience | National Australia Bank

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**From:** Data61 | Consumer Data Standards <CDR-Data61@csiro.au>

**Reply to:** Data61 | Consumer Data Standards <CDR-Data61@csiro.au>

**Date:** Friday, 9 August 2019 at 2:41 pm

**To:** Aaron Orellana <Aaron.Orellana@nab.com.au>

**Subject:** 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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