DESIGN TO THRIVE

DESIGN TO BIAS

DOCUMENT
OUTLINE

EXECUTIVE
SUMMARY

Data61 has been appointed as the Consumer Data Standards (CDS) team to develop standards for the Consumer Data Right (CDR). These standards will enable consumers to access and direct the sharing of data about them with third parties flexibly and simply, and in ways that ensure security and trust in how that data is being accessed and used.

This report was informed by research with 80 participants. This included a survey, prototype testing and exploratory interviews. This was weighted towards 30+ age groups; those considered to be "extreme" users; vulnerable consumers; those with accessibility needs; and those with varying English, financial, and digital literacy. This allowed critical issues to be surfaced early. Addressing the needs of these users, and considering any aversions they may have to data sharing, will greatly assist the widespread adoption of the CDR. The survey targeted younger participants (18-45) to balance out the age groups.

Consent Flow prototypes tested well, and it is clear that the key barriers to adoption will lie with data recipient value propositions and consumer trust. Many of the concerns outlined in this report are anticipated in the ACCC Rules. Simply articulating the Rules will help overcome barriers to adoption.

We recommended that data holders and recipients focus on the following areas:

1. Avoid vague descriptions of data use

2. Justify requests for data

3. Indicate the time and effort required to provide consent

4. Ensure language is written from a consumer perspective

5. Make language clear, understandable, and accessible

6. Give consumers a record of their data sharing agreement

7. Give data sharing control to consumers to gain trust

8. Provide non-digital revocation channels

9. Educate consumers on how data can be used

ACCC and Data61 are now exploring further research on consent/authorisation management, revocation, re-authorisation, joint accounts, and 90 day notification(s). While insights from Phase 1 will facilitate CDR adoption more widely, there is a recognised need to recruit more Early Adopters in upcoming work as they are expected to be the earliest CDR participants.

BACKGROUND

CONSUMER
DATA RIGHT

PROJECT BACKGROUND

The Australian government is introducing a Consumer Data Right legislation to give consumers greater control over their data. Part of this right requires the creation of common technical standards making it easier and safer for consumers to access data held about them by businesses, and – if they choose to – share this data via application programming interfaces (APIs) with trusted, accredited third parties. The Consumer Data Right is intended to apply sector by sector across the whole economy, beginning in the banking sector. The energy and telecommunications sectors will follow.

Data61 has been appointed as the Consumer Data Standards (CDS) team by Treasury to develop standards for the Consumer Data Right (CDR). These standards will enable consumers to access and direct the sharing of data about them with third parties flexibly and simply, and in ways that ensure security and trust in how that data is being accessed and used. The Australian Competition and Consumer Commission (ACCC) will be the lead regulator for the CDR with support from Data61 and the Office of the Australian Information Commissioner (OAIC). Data61's work includes validating the technical workstreams and putting into effect the ACCC's Rules.

There are three open work streams currently being delivered by Data61 including the API, Information Security, and Consumer Experience (CX) workstreams. This report has been produced as part of the CX workstream.

The ultimate aim of the CX workstream is to help organisations provide consumers exercising their rights under the CDR with a trusted and usable consent experience. This involves the development of validated design requirements and guidelines for organisations seeking consent from consumers and facilitating authorisation and authentication under the Consumer Data Right that meet the ACCC's rules for consent.

The Data Standards Body will know it has succeeded in its task if the standards it develops are accessible, usable and useful for data holders, and data recipients; if the consent model allows consumers to share their data in an easy, accessible, and informed way; and if the standards enable more choice and competition as part of the Consumer Data Right regime.

GUIDING STARS

CONSENT
MUST BE

According to the
**AUSTRALIAN
CONSUMER
DATA RIGHT**

Consent must be

- Genuine

According to the
ACCC

Consent must be

- Freely and voluntarily given
- Express
- Informed
- Specific as to purpose
- Time limited
- Easily withdrawn

MISSION
STATEMENT

During the kick-off workshop, the project team, including relevant Tobias and Data61 staff, agreed to the following mission statement:

"

Helping organisations provide **consumers of CDR** with a **trusted** and **usable** consent experience

PROJECT GOALS

A set of project goals also emerged from the kick-off workshop.

EXAMPLES OF GOALS	EXAMPLES OF WAYS OF MEASURING
• Clear & understood data cluster language	• Demonstrated comprehension in card sort
• Users feel in control of data 'buckets'	• Users express comfort/trust
• Consumers understand their consent	• Task completion & explanation
• Interface that allows detail if needed	
• Discover unmet needs in consent	• New insights generated
• Ensure consent patterns are usable	• High SUS (System Usability Scale)
• Actionable findings and patterns	• Aligns to template for CDR guidelines
• Identify where most uncertainty occurs	• Create model of uncertainty
• An appropriate level of friction	

RESEARCH APPROACH

RESEARCH
APPROACH

Research was carried out in 3 phases: 5.1, 5.2, and 5.3, reaching a total of 80 participants. Research was carried out by Tobias, Data61, and CHOICE, with CHOICE also fulfilling recruitment.

Phases 5.1 and 5.3 consisted of interviews and prototype testing to explore consumer comprehension, trust, control, and data sharing in general.

This study was approved by CSIRO's Social Science Human Research Ethics Committee in accordance with the National Statement on Ethical Conduct in Human Research (2007).

PHASE 5.2
Participants: **50**

Activity | **A survey accompanied by open-ended questions.**

The survey will explore participant comprehension of language used to describe data and the level of comfort with handing over certain types of data.

PHASE 5.1
Participants: **10**

Activity | **Card sorting exercise accompanied by some exploratory research.**

Card sorting is a design research technique used to understand how people categorise and make sense of information.

PHASE 5.3
Participants: **20**

Activity | **Prototype testing to explore consumer expectations, needs, and behaviours in relation to the sharing of financial data.**

Scenarios include: *Product/service comparison, applying for credit, account switching, personal budgeting, accounting/ taxation.*

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PROPOSAL SUMMARY
ONE PAGER

LANGUAGE & PAYLOADS
(5.1)

Set up the project for success, review existing content and research. Validate payloads with consumers, define language, data clusters and provide recommendations.
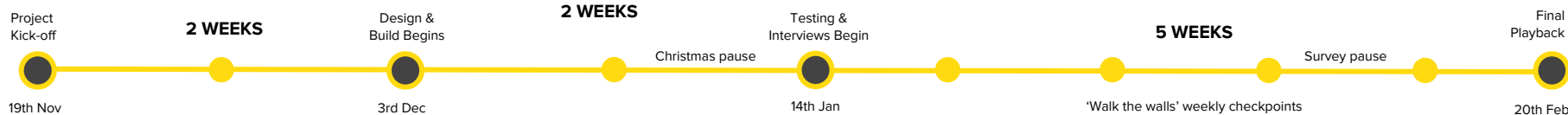
PROTOTYPE DESIGN & BUILD
(5.2)

Working in close collaboration with Data61, our team will design and build the consent model and prototypes specific to an Australia context ready for testing.

PROTOTYPE TESTING & CONSUMER INTERVIEWS
(5.3)

Generate findings through consumer testing and interview sessions. The resultant output will be a comprehensive report with recommendations regarding the prototypes usability, consent model and language, expectation insights, consumer appetite to adopt tested concepts, evidence, actions, strategic considerations and recommendations.

Project Kick-off — **2 WEEKS** — Design & Build Begins — **2 WEEKS** — Christmas pause — Testing & Interviews Begin — **5 WEEKS** — Survey pause — Final Playback

19th Nov — 3rd Dec — 14th Jan — 'Walk the walls' weekly checkpoints — 20th Feb

ACTIVITIES

Project kick-off
Project culture & rhythm
Recruitment strategy & plan
Review of existing content (Language & Payloads)
Card Sorting exercise (x10 Consumers)

Recruitment (continued)
Survey (optional)
Concept sketching
Prototype design
Prototype build
Prototype iteration

Consumer testing & interviews (x20)
Usability testing
Testing of consent model & language
Analysis and Synthesis of data
Packaging of prototype & associated design assets

OUTPUTS

Mission statement
Agreed scope & schedule
Recruitment brief
Card sort findings

Consent model
User flows
Concept sketches
Interactive prototype (editable files)
Moderation guide for testing

User testing insights
Interview findings & insights
Final report & recommendations

RESOURCE PROFILE:

Tobias

Future Research
(5.4)

February 2019 onwards

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RESEARCH PARTICIPANTS

PARTICIPANTS

RECRUITMENT
REFLECTIONS

30 participants were recruited through and outside of CHOICE networks including members drawn from accessibility testing databases, and snowballed through staff contacts. Many participants knew of CHOICE and supported its activities, and from this we infer that participants held a strong interest in consumer issues and advocacy.

Participants lived in NSW, Victoria, ACT, NT, QLD, and Tasmania, though no participants were from WA. While there was gender parity, more than half of participants had families, and the majority (70%) were from metropolitan areas.

43% of participants were on low incomes, with 27% self-identifying as having a disability, and 30% being from non-English speaking backgrounds.

Aboriginal and Torres Strait Islander peoples were underrepresented in this study, as were participants under the age of 29 and those living in remote and rural areas. To address this issue, a larger amount of younger participants (70% between 18-45 years) were recruited for the survey. There will also be a focus on recruiting a wider range of

participants in the next stage of research including early adopter and technologically savvy individuals, as well as an aim to get a more even spread of Aboriginal and Torres Strait Islander peoples and those living in remote and rural areas.

Although there was a reasonably high percentage of people self-identifying as having a disability, the number representing each type of screened disability was low due to the overall sample size.

A **screener survey** was developed that all prospective participants were required to complete to ensure participants met a range of diversity criteria. To ensure participants were informed about the study, **Participant Information Sheets** and **Consent Forms** were sent to them to read and complete.

Another **50 participants** were recruited by Pureprofile for the 5.2 survey. Pureprofile achieved the spreads we defined, and maintained those spreads through 3 rounds of respondent disqualifications (due to inadequate or incomplete responses).

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RECRUITMENT BY
CHOICE

CHOICE was contracted to recruit participants given its direct line to consumers and proven track record in conducting research for and about consumers that includes product testing and reviews, as well as consumer pulse surveys that signal issues of concern to Australian consumers.

CHOICE is a consumer advocacy organisation whose mission is to fight for fair, just and safe markets for all consumers, particularly vulnerable ones. Its members are typically proactive and informed consumers, while CHOICE Transformer customers represent more complacent consumers looking for convenience.

CHOICE is represented on the Consumer Data Standards Advisory Committee and Open Banking Consumer Experience Working Group, advocating for testing with a diverse range of consumers.

Given the short timeframe to conduct the consumer research, and the small sample of participants, CHOICE supported the strategy to test mostly with "extreme" users, vulnerable consumers at the extreme ends of financial, technical and language literacies. Although some participants were also CHOICE members who tend to be more conscious consumers, testing with these participants helped to surface issues quickly, and ensure that the implementation of the CDR would be adopted by a wider population, not only early adopters.

RECRUITMENT BY
PUREPROFILE

Pureprofile was engaged to recruit a broad sample of Australians to respond to the survey we designed.

Pureprofile is a data and insights business, underpinned by technology. They have a broad consumer and business panel and promote that they can "Access hard to reach people with trusted audience profiling. Pureprofile offers cost-effective quality samples for researchers to generate valuable insights."

After assessing other vendors, including CHOICE, Askable, SurveyMonkey and Farron, Pureprofile was selected, primarily for the speed and cost in which they could achieve the recruitment spread required. There was a focus on recruiting younger participants (70% between ages of 18-45) to compensate for the increase of older participants recruited in the face-to-face phases of research.

The final recruitment spread and raw data for the survey was documented by Pureprofile.

CHOICE RECRUITMENT
STRATEGY

NUMBERS

30 participants total

TARGETS

50% consumers
50% SMEs: sole traders using business banking

- Gender parity
- High, medium and low income
- Metro, rural and remote dwellers
- Experience of financial distress
- Technophobes, late and early adopters
- Single and multi-banked

EXTREME SAMPLING

- Low language, technical and financial literacy
- Disability (i.e. speech, visual, hearing)
- Experience of financial distress
- Aboriginal and Torres Strait Islander peoples
- Migrant representation
- Remote and rural area dwellers

MANDATORY CHARACTERISTICS

Financial **decision makers** in family / business
Use **internet banking**

OUT OF SCOPE

Minors, carers/guardians, big enterprises
'Shoppers', since payment is out of scope

RECRUITMENT RESULTS

		PHASE 5.1	PHASE 5.3
GENDER	Male	5	9
	Female	5	11
AGE	18-29	1	2
	30-39	0	7
	40-49	1	5
	50-59	5	1
	60+	3	5
LIFE STAGE	Singles	2	3
	Couple	1	3
	Family	6	11
	Empty nester	1	3
INCOME	Low (under $37,000)	6	7
	Medium (between $37,000 and $87,000)	1	9
	High (over $87,000)	2	4

RECRUITMENT
RESULTS

		PHASE 5.1	PHASE 5.3
FINANCIAL DISTRESS	Yes	4	8
	No	6	12
CULTURE	Aboriginal and/or Torres Strait Islander	0	1
	First generation immigrants to Australia	3	1
LANGUAGE	English as a first language	7	13
	English as a second language	3	7
DISABILITY	Hearing impairment	1	
	Speech / auditory impairment	1	
	Visual impairment	1	1
	Cognitive impairment		2
	Physical impairment		2

RECRUITMENT
RESULTS

		PHASE 5.1	PHASE 5.3
LOCATION	Metro	7	14
	Rural	2	3
	Remote	1	4
TECHNOLOGY	Early adopters	4	12
	Later adopters	4	7
	Technophobes	1	1
BANKED	Personal	4	13
	Business	5	7

RESEARCH APPROACH FOR 5.1

PURPOSE OF
RESEARCH

1

Research and test data clusters and language

- Tested the proposed language and data clusters

- Explored how participants believed data should be grouped

- Had participants create language to describe those groups.

2

Explore expectations around data sharing

- Explored consumer comprehension of proposed language and data clusters

- Explored expectations around consent and data sharing

THE
APPROACH

EXPLORATORY
QUALITATIVE INTERVIEW

Participants discussed
Appetite and Expectations
by answering open ended questions in one-on-one interviews, guided by an interview outline.

OPEN
CARD SORT

Participants developed
Data Cluster Language
by grouping proposed 'Permission Language' and naming the emerging groups. This was done via an open card conducted through OptimalSort.

GOOGLE
SHEET

Participants developed
Permission Language & Data Cluster Language
by naming groupings of 'Information available' developed by Data61. This was done using a Google Sheet.

LANGUAGE: WHAT WE TESTED

WHY TEST
LANGUAGE?

As of November 2018, the language developed by Data61 for the implementation of the Customer Data Right was different to the language applied as part of Open Banking in UK in several key ways:

DATA 61	UK
Data61 language included several payloads per 'data cluster language'	UK language corresponds more directly to payloads
Data61 language had one level	UK language has two (data cluster & permission language)
Data61 language used longer sentences	UK language uses short headers
Data61 language did not include 'your' in language	UK language does

Some of these differences can impact consumer comprehension. Based on recommendations from the OBIE UK CX Guidelines and Tobias' expertise in usability and accessibility, it was decided to align more closely with the recommendations coming out of the implementation of Open Banking in UK.

For the purpose of the research described in this report a new language structure and new language was therefore developed. The new language structure and language is outlined in the next two slides.

The language initially proposed by Data61 and the language implemented in UK can be found in the Appendix.

The prototypes that were developed for 5.3 contain refined language and data clusters.

TESTED LANGUAGE
STRUCTURE

Drawing on the OBIE UK CX Guidelines, the following language structure was applied during testing:

Data cluster language   **+**

Data cluster language   **–**

- Permission language
- Permission language
- Permission language

Example of this structure applied in UK:

Your Account Features and Benefits   —

- The type of account you have
- The fees, charges and interests you pay
- The benefits, services, rewards and interest your account offers

Your Regular Payments   —

- Your direct debits
- Your standing orders
- Other payee agreements you have set up

The language that was tested can be found in the appendix.

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RESEARCH APPROACH FOR 5.3

PURPOSE OF
RESEARCH

1 **Test usability, consent model and language**

- Test proposed (consumer facing) data clusters and language

- Test Consent Flow prototypes (i.e. consent, authentication, authorisation)

- Inform the Consent Model

- Test (UX aspects) the ACCC rules

2 **Explore needs, behaviours, expectations, and appetite to adopt concepts**

- Explore consumer comprehension, trust and comfort in the context of the use cases

- Explore future requirements (i.e revocation, consent management / reauthorisation)

THE
APPROACH

EXPLORATORY QUALITATIVE INTERVIEW

Session 1 - prototype testing January 14 - 19th	Session 2 - prototype testing January 21 - 26th	
Three prototypes tested:	Two prototypes tested:	**SYNTHESIS** **January 28 - 31st**
Consumers - Manage my finances - Switch banks	**Consumers** - Product/service compare - Applying for credit	
Sole traders - Accounting / taxation - Switch banks	**Sole traders** - Product/service compare - Applying for credit	
Research took place in **Rural NSW & remote**	Research took place in **Metro & regional Victoria**	

PROTOTYPES: WHAT WE TESTED

PROTOTYPE
DESIGN

The prototypes tested in 5.3 were based on interpretations of the **ACCC Rules** published in December 2018 as well as the consent models in the **OBIE UK CX Guidelines**. Inspiration was also drawn from a range of consent models implemented in the UK as part of Open Banking, as e.g. described here.

Five prototypes were developed for individual and business consumers and to reflect the proposed use cases:

- **Managing my finances**
- **Accounting / taxation**
- **Switching banks**
- **Applying for credit**
- **Product comparison**

Each prototype included language and data clusters relevant to the specific use case. Other elements, such as buttons, the process guide and 2FA, varied across prototypes to test different options.

The prototypes were reviewed in a workshop with ACCC and Data 61 to gain consensus before they were tested, and to shape the direction of research.

The logic behind the prototype design is outlined on the following pages.

NB A straight redirect flow was tested as a baseline for research purposes and is not a proposed model.

The Accounting Tool

Welcome to the Accounting Tool

The Accounting Tool allows you to process your tax return. To do so we need your approval to access information from your bank account(s).

Close

Proceed
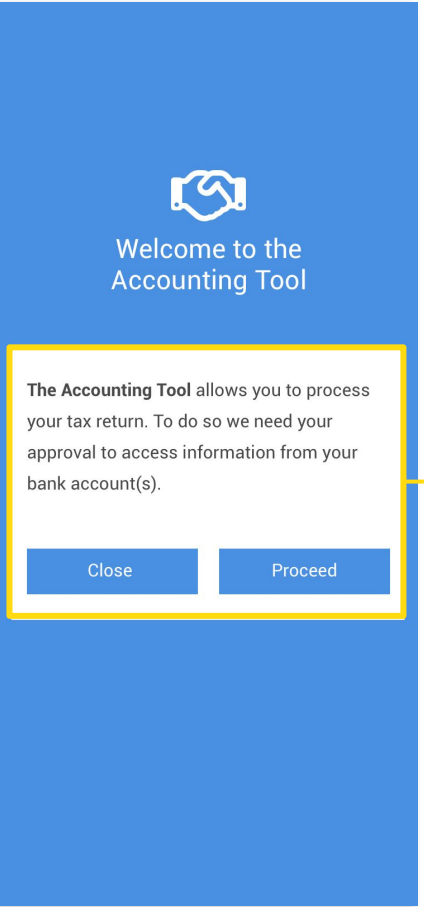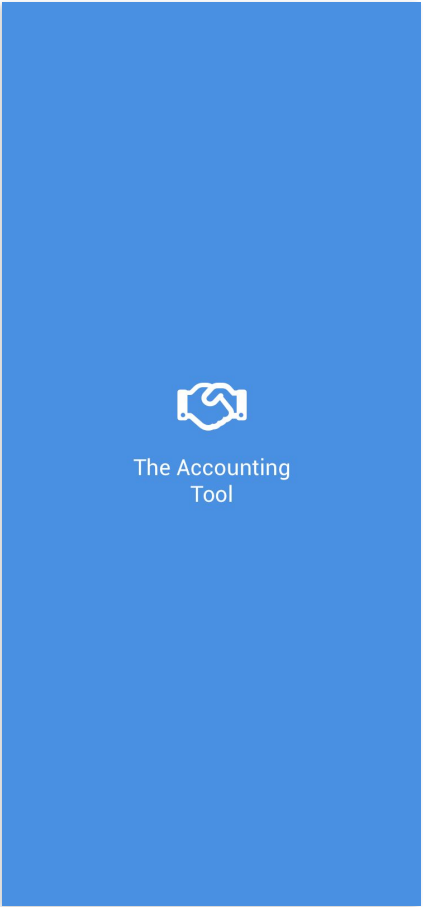
An overview of what is about to happen and purpose of data sharing.

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The Accounting Tool

| 1 Consent | 2 Authenticate | 3 Confirm |

Consent

The Accounting Tool is requesting your consent to access the following information from your bank account(s).

Your personal details	+
Company contact information	+
Account details	+
Company details	+
Regular payments	+
Transactions	+

How your data will be used

- We will use your data to process your tax return.
- We will store your data securely.
- We will have ongoing access to your data for **1 year**. This access will expire on **January 31st 2020**. We will collect your data daily, unless or until you revoke your consent.
- You may **revoke your consent** at any time.

| Cancel | Confirm |

Process guide on top (progress indicator)

Accordion menu for deeper exploration

Seperate section for how data will be used (bullet pointed for easy scan)

Clear cancel/confirm buttons of similar design (no visual biasing by emphasising 1 button over another)

The Accounting Tool

| ✓ Consent | 2 Authenticate | 3 Confirm |

Select your bank

Enter bank name 🔍

| Bank A |
| Bank B |
| Bank C |
| Bank D |
| Bank E |
| Bank F |
| Bank G |
| Bank H |
| Bank I |

| Cancel | Confirm |
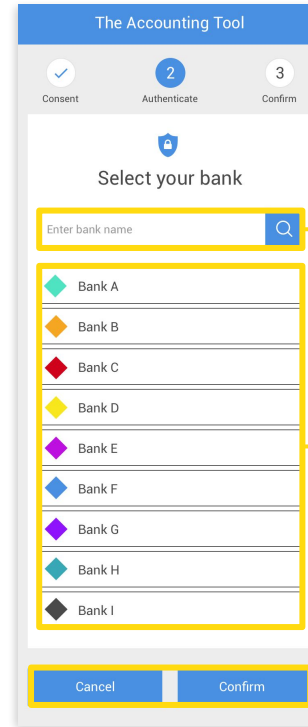
Search field for quick navigation

Use of banking logos for quick skim / familiarity

Most used banks at the top, the rest in alphabetical order

Cancel/confirm buttons

35

The Accounting Tool

Consent ✓ | 2 Authenticate | 3 Confirm

ABC Bank

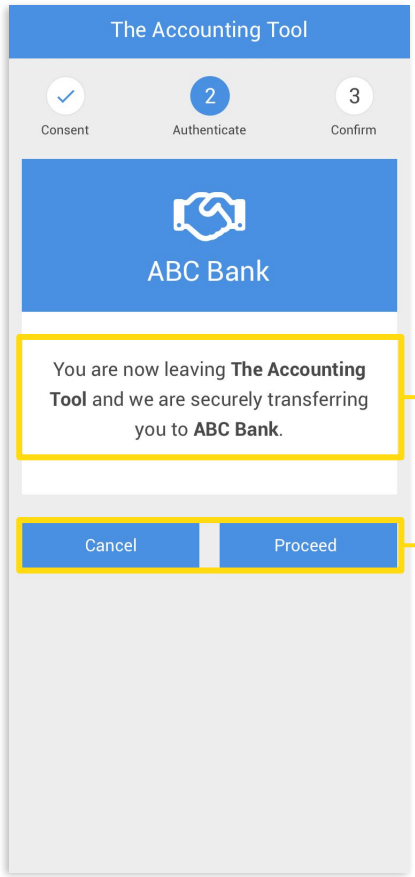You are now leaving **The Accounting Tool** and we are securely transferring you to **ABC Bank**.

Cancel | Proceed

Clearly communicate that the user is about to be re-directed

Cancel / confirm buttons
(rather than automatic re-direct, so users have an opportunity to read and understand what is about to happen)

ABC Bank

Bank app ad branding
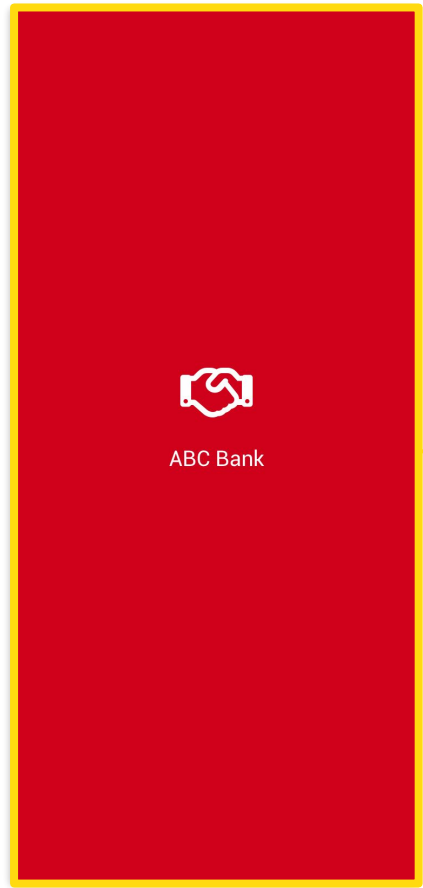
NOTE: This redirect model was tested at a high level to gauge response and direction.

This flow is **not** to be seen as a proposed flow, but as an artefact used to investigate baseline consumer responses to various scenarios.

CONSENT

WHAT WE TESTED

ABC Bank

ABC Bank Login

The Accounting Tool is requesting ongoing access to information from your bank account(s). To continue, please confirm your identity.

ABC Bank ID:

Password:

Cancel   Login

Forgotten your ABC Bank ID?
Forgotten your password?

Familiar layout

MESSAGES

ABC Bank
Your verification code is **234689**   3

Consent   Authenticate   Confirm

We have sent an SMS to your mobile.
Please enter it below.
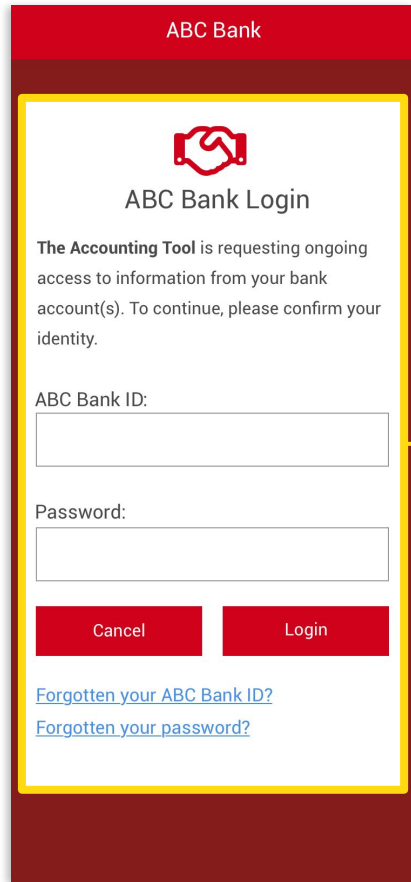
Cancel   Next >
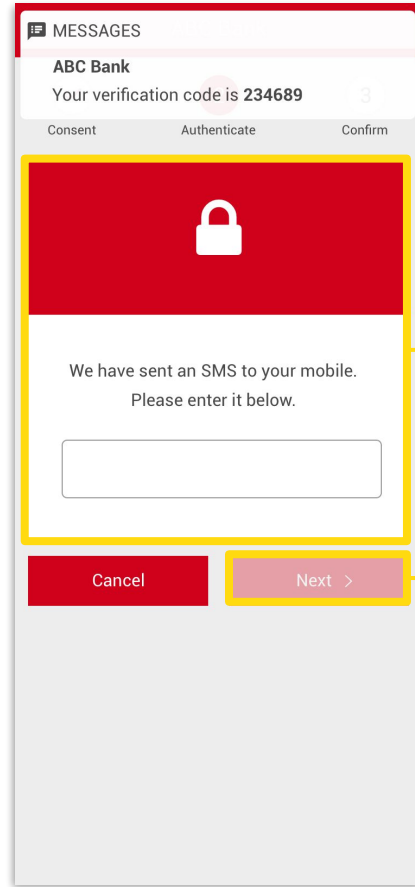
Simple 2FA layout

Next button blanked out until verification code is added.

ABC Bank

✓ Consent   ✓ Authenticate   3 Confirm

Confirm

The Accounting Tool is requesting your consent to access the following information from your bank account(s).

Your personal details +

Company contact information +

Account details +

Company details +

Regular payments +

Transactions +

How your data will be treated

- **The Accounting Tool** will store your data securely.

- **The Accounting Tool** will have ongoing access to your data for **1 year**. This access will expire on **January 31st 2020**. We will collect your data daily, unless or until you revoke your consent.

- You may **revoke your consent** at any time.

Deny   Confirm

Mirror consent form

Mention of the 3rd party provider in banking space

ABC Bank

✓ Consent   ✓ Authenticate   3 Confirm

Select Accounts
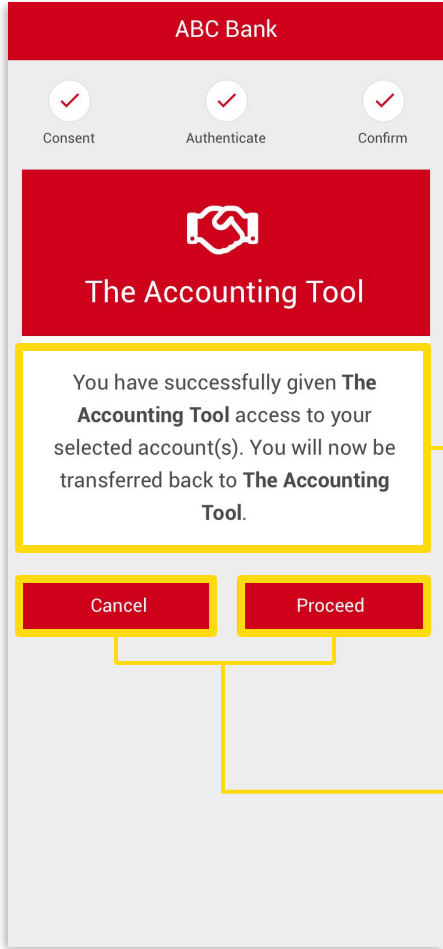
Please select the account(s) you want to share with **The Accounting Tool**.

☐ Transaction account
80255 588622147

☐ Savings account
80255 685469955

< Back   Confirm >

Provide control over which accounts consumers share data from.

Confirm button blanked out until account(s) have been selected.

ABC Bank

Consent ✓   Authenticate ✓   Confirm ✓

The Accounting Tool

You have successfully given **The Accounting Tool** access to your selected account(s). You will now be transferred back to **The Accounting Tool**.

Cancel   Proceed

Text indicating what has happened and what will happen next

Proceed cancel buttons providing users a final option to cancel consent process and making sure they read before proceeding

The Accounting Tool

✓

We have successfully accessed your data.

Close   Proceed
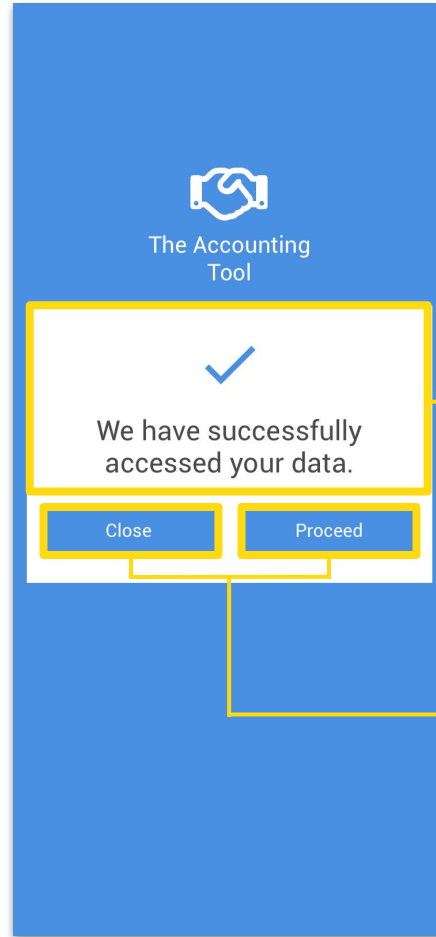
Clear confirmation that data sharing was successful

Buttons to pause users and ensure they read text.

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FINDINGS & RECOMMENDATIONS

OVERARCHING THEMES

USABILITY: Consent Flow
The Consent Flow prototypes (consent, authentication, and authorisation) tested well overall and paths for improvement have been identified. We have a reasonable level of confidence that consumers will understand how to navigate the process of sharing their data using Data61's proposed Consent Flow.

Needs-based sharing
The propensity to share data was context dependent. Many surveyed participants would not share their data in isolation, but most would consider sharing if there was a justification or benefit. In face-to-face research, many initially averse participants saw the value of CDR when presented with a use case that they felt justified data sharing. The data recipient's value proposition is key to the sharing of data, and the CDR can facilitate this exchange.

Anticipate Fear and Assuage Concerns
Participants were especially averse to data sharing when it was unclear what would happen to their data. This lack of clarity led to consumers imagining the worst, commonly invoking examples of data breaches or information being on-sold for marketing. The ACCC Rules anticipate many of these concerns. Articulating the Rules on unambiguous disclosure of data use (7.13d) and the prohibition of using CDR data for unrelated marketing (8.9) will go a long way in overcoming these barriers.

Recommendation
With these findings in mind, we recommend that more attention be paid to mitigating concerns about data handling. We are confident that many of these concerns can be addressed during the Consent Flow by appropriately surfacing the Rules, but more research needs to be conducted to gauge where, when, and how much information is sufficient.

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1

Avoid vague descriptions of data use

Undetailed and ambiguous disclosure of data use and handling led to most participants **imagining worst case scenarios**. Many participants assumed their information would be onsold for marketing purposes or that outsourced providers would not be bound by the same data sharing agreement.

More than 52% of surveyed participants ranked 'who their data will be shared with' as the most important thing to know before sharing their information. Some participants during research were especially concerned that their transaction data would be shared with Centrelink (31%), ATO (60%) or a marketing agency (33%).

The Rules prohibit the use of CDR data for unrelated marketing purposes and unauthorised sharing, and we recommend that data recipients clearly communicate these Rules during the Consent Flow.

To satisfy the 'unambiguous disclosure' Rule (7.13d) we recommend data recipients clearly state:

1. Why each data cluster is required, and how far back in time data will be accessed.
2. How each data cluster will be used, including if inferences will be made, applications will be influenced, or if CDR data will influence how services/products are priced or provided
3. How data will be handled during and following the consent period, including: who will access the data; that data will not be used for unrelated marketing purposes; and that outsourced providers will be bound by the consent agreements.
4. How data will be stored, including after revocation/expiry
5. What will happen to CDR data following revocation/expiry, including redundant data
6. And any other use during or following the consent period

2

Justify requests for data

Participants would not generally consent if they didn't understand why data was being requested. [This finding was further supported by the survey.](#) Some participants didn't feel some kinds of information needed to be shared, while others felt entire use cases were unjustified.

It is recommended that any type of data request extensively and unambiguously outlines exactly why data is requested, as the CDR Rules require. Rather than providing this justification in a single block of text, we recommend attaching specific justifications to each data cluster to clarify why each data cluster is being requested, and what it will be used for.

"I am little but of privacy nerd. If you can't tell me what you are doing with it, then it'll be no thanks"

Phase 5.3 Participant 8

3

Indicate the time and effort required to complete the process

Although the design patterns were well understood, the overall process was confusing at times because it was unfamiliar. The data recipient should provide an upfront overview of the steps involved and expected time required to provide share data. These steps should be reflected in the Consent Flow to show the user where they are in the process.

"Even from this first screen, I would actually close it [if I had more info] I'd be curious enough to continue"

Phase 5.3 Participant 18

To manage expectations and inform progress the following is recommended:

- Inform consumers up front (before starting the process) how this process works, what steps are involved and the time it takes to complete.

- Progress should be indicated throughout the Consent Flow that aligns with what was communicated to consumers up front.

- The language used to indicate progress should reflect the task rather than the technical stage. For example, Consent, Login, Confirm, as opposed to Consent, Authenticate, Authorise.

4

Ensure language is written from a consumer perspective to increase trust

It important to focus language on consumers SHARING data rather than the data recipient ACCESSING information.

Some participants felt they had not only given data recipients and outsourced providers access to their banking data, but also to their bank account (e.g. to transfer money). This level of access made participants apprehensive about using something so invasive.

It should be clear that the action is consumer data sharing not account sharing.

"The fact that they can access everything, that I will consent that they will have access to everything [concerns me]"

Phase 5.3 Participant 20

45

5

Make language clear and accessible

To improve comprehension we recommend following WCAG2.1 guidelines and/or the GOV.AU writing style*

The following is recommended in general:

- Use everyday language throughout *(no jargon- fewer than 8% of participants resonated with the term 'entity'*)
- Avoid negations *(i.e. asking for 'list of direct debit payees **without** details')*
- Use short and concise headings and sentences *(avoiding unnecessary words can help)*
- Avoid long terms and conditions
- Ensure consistent terms and structure throughout
- Aim for a lower secondary education reading level as recommended in WCAG criteria 3.1.5 *(Level AAA).*

Structure is also important as it gives context to language and impacts comprehension. The following is recommended for structure:

- Use simple structure with few groups
- Use logical hierarchy between groups
- Use logical hierarchy within groups

"I'm not sure what that question is asking me"

Phase 5.3 Participant 18 (unsure of what 'entities' was)

*https://guides.service.gov.au/content-guide/writing-style/

6 **Give consumers a record of their data sharing agreement**

While participants knew that they had shared their banking data, some participants could not remember the conditions of data sharing (e.g. how long the data would be shared for) immediately after finishing the consent flow.

We recommend combining the Consent Flow with other communication to consumers to:

- Confirm that sharing has occurred
- Provide a record of the sharing agreement
- Detail how and where consumers go to find out more information
- Provide instructions for managing and revoking data sharing agreements and the ability to do so on the data recipient and data holder dashboards (as outlined in the ACCC Rules)
- List non-digital communication channels

[I would like something to print and assure me that the transfer was successful. Otherwise it feels like] "it has gone into a black hole".

Phase 5.3 Participant 3

7 Data must be controlled by consumers to gain trust

If sharing data means losing control of that data, including after consent expires, we expect consumers to be more apprehensive about CDR participation. The ability to cancel, manage, and revoke should be emphasised as they are all points of intervention that give control to the consumer.

Consumer trust and control extends past consent periods and to consent revocation and expiry. Most participants (including 54% surveyed) expected that revocation would result in the deletion of all CDR data. What constitutes revocation (e.g. full or partial deletion) should be clearly described to consumers before they provide consent.

"If my data is not deleted after revoking I probably wouldn't do any of this sharing stuff."

Phase 5.1 Participant 8

Control consists of three aspects, and we recommend that data recipients and holders facilitate control in the following ways to gain consumer trust:

Consent
Consumers have a genuine choice about whether or not to consent to the sharing of their data. This should be in line with the ACCC Rules on Consent (7.10).

Transparency
Consumers can track and assess if data was used, handled, and shared in a way that matches their understanding of what would occur prior to consent.

Action
Clear and accessible actions are available to consumers after their data has been shared, including after expiry. If a consumer revises their decision, they should be able to take appropriate action. This should be in line with the ACCC Rules on withdrawing and managing consent/authorisation (7.15 - 7.19, 7.21 - 7.24)
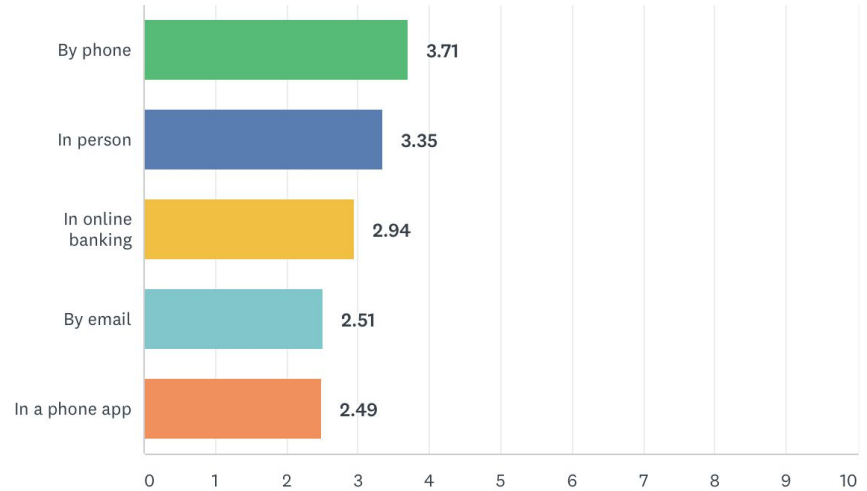
8 Provide non-digital revocation channels

In both the survey and 5.3 research we found that most participants would use a non-digital means of revocation first, especially phone and in-person. Email was a common third preference.

Some participants felt that one-on-one and face-to-face interactions would lead to more accountability and request fulfillment, while others went to non-digital channels as they were already routine choices.

Digital-only channels would fail to meet consumer expectations and reduce trust in the CDR.

We recommend non-digital channels as starting points for the revocation process. These can be used as intervention points for customer service staff to guide consumers to digital revocation channels and increase digital literacy and adoption.

Bar chart:
- By phone: 3.71
- In person: 3.35
- In online banking: 2.94
- By email: 2.51
- In a phone app: 2.49

Participants were asked how they would urgently cancel a data sharing agreement. Ordered from most likely to least likely.
(n = 51; X Axis = weighted average)

"I suppose with the technology aspect and what happens with society today is that there's not enough person to person contact. There's no one to call back on."
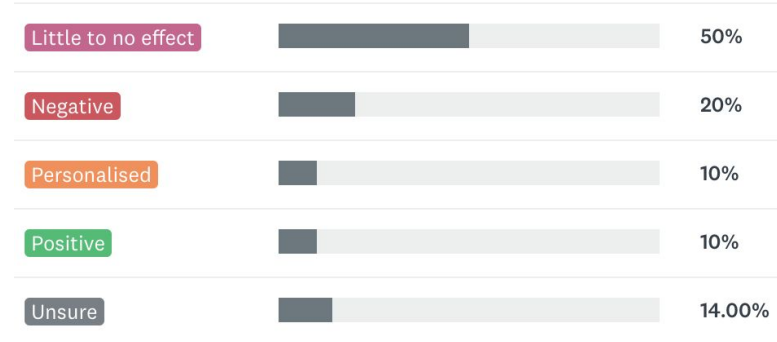
Phase 5.3 Participant 16

49

9 Educate consumers on how data can be used

The survey demonstrated that respondents had an insufficient understanding of what can be inferred from their financial data, as well as how it may be used to tailor products and pricing.

Less than half of the respondents thought, for example, that gender or age could be inferred from transactional data.

Whilst the majority of respondents understood that financial data could be used to affect the outcome of an application process for credit, far fewer thought it would affect an insurance policy, the outcome of an application process for insurance, or the results of prices you get when you shop online.

We support the planned ACCC and OAIC consumer education campaign to help educate consumers about the potential uses of their data so as to help consumers recognise the value and implications of data sharing.

Little to no effect	50%
Negative	20%
Personalised	10%
Positive	10%
Unsure	14.00%

Participants were asked how sharing banking data might affect the prices they get when they shop online.

"I don't understand why they need my personal details, but I don't care. I don't have anything to hide."

Phase 5.3 Participant 16

50

PROTOTYPE

The Accounting Tool

Welcome to the Accounting Tool

The Accounting Tool allows you to process your tax return. To do so we need your approval to access information from your bank account(s).

Close | Proceed
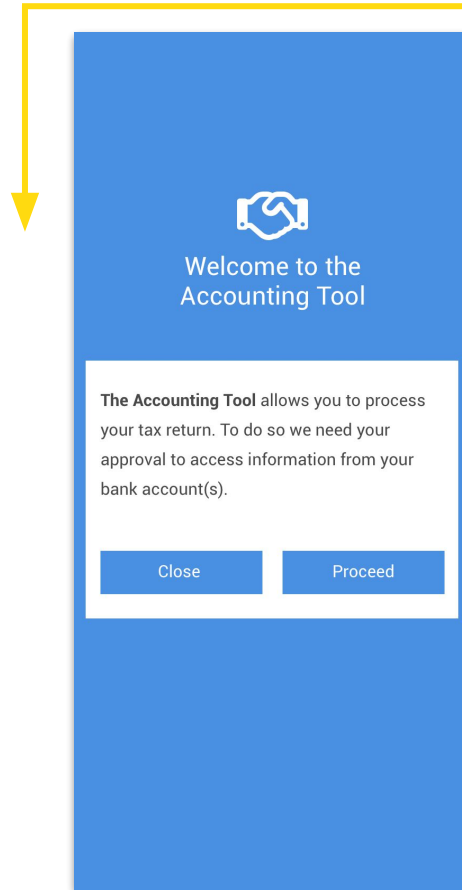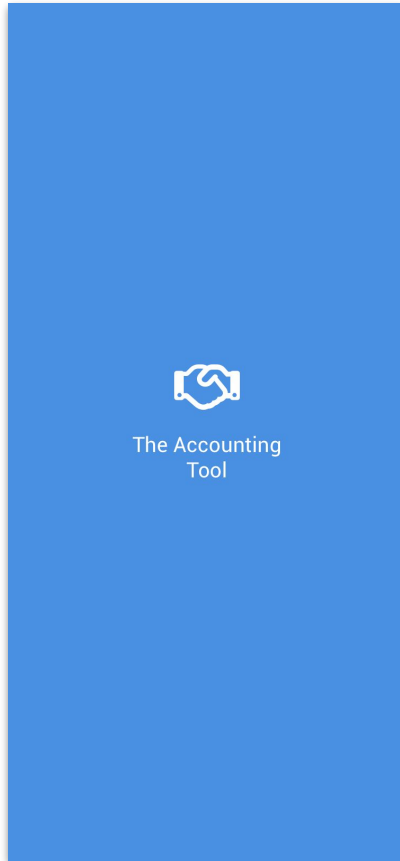
Include information about the data sharing upfront

Data recipients should clearly explain the value added by sharing data to increase the chances of consumer adoption. Introducing the concept of data sharing without a clear value proposition will not be conducive to adoption.

Data recipients should provide a clear overview of the Consent Flow (i.e. consent, authentication and confirmation) and an indication of how long the process will take.

"Without not knowing much more about it I'll probably not proceed... I'll just close it"

Phase 5.3 Participant 20

"Probably, first time I would just close it, and go out to read about it and come back."

Phase 5.3 Participant 19
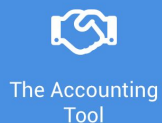
The Accounting
Tool

Welcome to the
Accounting Tool

The Accounting Tool allows you to process your tax return. To do so we need your approval to access information from your bank account(s).

Close

Proceed

Include information about accreditation and Consumer Data Right upfront

The concept of sharing data was unfamiliar to most participants. The level of trust and confidence consumers had at this point varied, but was generally low.

The data recipient should clearly state **that only accredited organisations are allowed to request data as part of the Consumer Data Right**. This will increase familiarity with the CDR and reduce the risk of phishing.

The data recipient should provide a link to their accreditation as well as a link to more information about the Consumer Data Right.

It should also state that it the choice to share data lies with the consumer, and that this access can be revoked at any time without penalty or detriment. Brief instructions for how to revoke should be provided here (e.g. Settings>Data Sharing)

The Accounting Tool

| 1 Consent | 2 Authenticate | 3 Confirm |

Consent

The Accounting Tool is requesting your consent to access the following information from your bank account(s).

Your personal details +

Company contact information +

Account details +

Company details +

Regular payments +

Transactions +

How your data will be used

- We will use your data to process your tax return.

- We will store your data securely.

- We will have ongoing access to your data for **1 year**. This access will expire on **January 31st 2020**. We will collect your data daily, unless or until you revoke your consent.

- You may **revoke your consent** at any time.

| Cancel | Confirm |

aBank

| 1 Consent | 2 Authenticate | 3 Confirm |

Consent

aBank is requesting your consent to access the following information from your bank account(s).

How your data will be used

- We will only use your data to transfer your details over to your new account.

- We will store your data securely.

- We will have **one time** access to your data.
- We may share your data with an outsourced provider. **Find out more here.**

| Deny | Confirm |

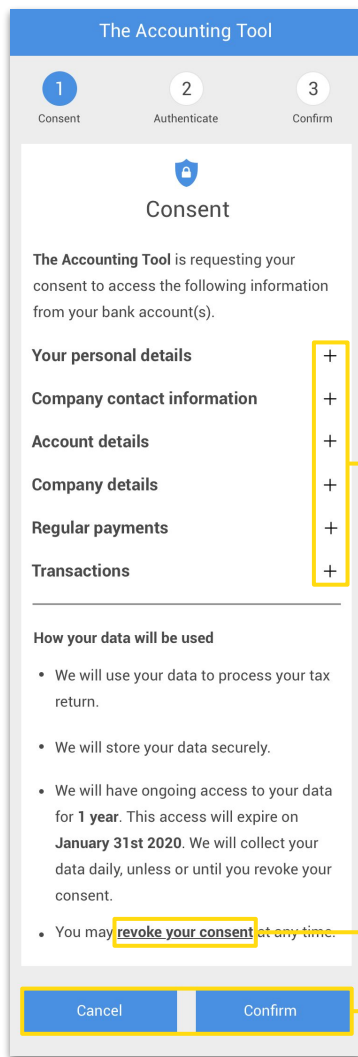## Improve indication of progress

A line should be added between the dots to clearly indicate this is a process. This language should reflect the task rather than the technical stage. (e.g.. Consent, Login, Confirm)

Reduce cognitive overload

Splitting content-heavy screens minimises the need for scrolling and reduces cognitive overload, thus making it more likely that consumers will read the content.

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The Accounting Tool

1 Consent 2 Authenticate 3 Confirm

🛡

Consent

The Accounting Tool is requesting your consent to access the following information from your bank account(s).

Your personal details +

Company contact information +

Account details +

Company details +

Regular payments +

Transactions +

How your data will be used

- We will use your data to process your tax return.

- We will store your data securely.

- We will have ongoing access to your data for **1 year**. This access will expire on **January 31st 2020**. We will collect your data daily, unless or until you revoke your consent.

- You may **revoke your consent** at any time.
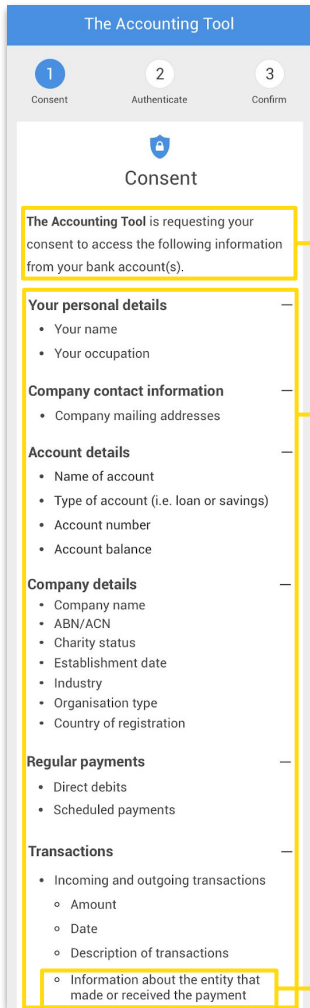
Cancel | Confirm

Accordion menus

Accordion menus reduce cognitive overload while also allowing more information to be revealed if desired. The following text could be added in the header to describe the function of the '+' signs: *"Click + to find out more about why this information is being requested."*

Need for clear use of in-text links

Many participants believed this link would lead them to a screen on which they would be able to revoke consent, or more information about how to revoke consent.

Add back / cancel / confirm buttons

The page title and buttons need to reflect the page intent. The de facto standard is to have a 'Cancel' button to exit the process entirely, and a back button in the top-left corner.

CONSENT

RECOMMENDATIONS

55

The Accounting Tool

1 Consent 2 Authenticate 3 Confirm

Consent

The Accounting Tool is requesting your consent to access the following information from your bank account(s).

Your personal details —
- Your name
- Your occupation

Company contact information —
- Company mailing addresses

Account details —
- Name of account
- Type of account (i.e. loan or savings)
- Account number
- Account balance

Company details —
- Company name
- ABN/ACN
- Charity status
- Establishment date
- Industry
- Organisation type
- Country of registration

Regular payments —
- Direct debits
- Scheduled payments

Transactions —
- Incoming and outgoing transactions
  - Amount
  - Date
  - Description of transactions
  - Information about the entity that made or received the payment

Use conversational language to make text easier to understand

Consider changing this to the following: *'We need access to the following data from your bank account(s).'*

Use less jargoned terminology

Several participants had issues understanding what 'entity' meant. This finding was reinforced in the survey.

"Who do you make payments to? might be better."

Phase 5.3 Participant 3

Maintain accordion state

Menus should expand upon selection and stay open unless the user actively closes the menu. This will allow the user to review selected clusters in more detail.

Allow for more granular consent if possible

Some participants wanted to be able to choose which data to share, especially in terms of personal data and contact information. The ability to do this is envisaged for future versions of the CDR.

Clarify why each specific data cluster is being requested

Clearly state the purpose of data sharing for each specific data cluster, rather than an overall statement about the purpose of sharing.

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Transactions   +

How your data will be used

- We will use your data to process your tax return.

- We will store your data securely.

- We will have ongoing access to your data for **1 year**. This access will expire on **January 31st 2020**. We will collect your data daily, unless or until you revoke your consent.

- You may **revoke your consent** at any time.

Cancel   Confirm

Define how data will be stored

Many participants were averse to data sharing due to concerns of fraud and data breaches. Only 27% of surveyed participants were confident that their data would indeed be stored securely. The general sentiment was that data simply could not be stored securely, making this statement misleading rather than reassuring. This statement caused participants to question how their data would be stored, and how long it would be stored for.

Increasing public trust in data storage is imperative to the CDR's success. It is recommended that any statements about data security should detail how data is stored and should not claim absolute security. It is also possible that such a statement could be removed from the Consent Flow and noted elsewhere in more detail.

"There is no such thing as data being completely secure. There is nothing there saying they won't sell the data."

Phase 5.3 Participant 13

"How will they store that? And for how long? The fact that it doesn't explain or have a hyperlink to explain it makes it harder to trust."

Phase 5.3 Participant 20

Delete the term 'once-off'

The description 'once-off' for assessment is not needed.

How your data will be used

- We will use your data to provide a once-off assessment of your income and expenses.

- We will store your data securely.

- We will have **one time** access to your

- We may share your data with an outsourced provider. **Find out more here.**

Back   Confirm

The meaning of 'one-time' and 'once-off' access is not clear

The understanding of what 'one-time' and 'once-off' meant varied widely in both the 5.3 research and the survey. 5.3 participants tended to think it meant indefinite access, as did many survey participants (33%). Most survey participants (43%) understood it to mean a point in time snapshot as opposed to access that may collect data from previous years. Of the 70 participants who were asked this question, no responses consistently aligned with the technical meaning of the word. Communicating the duration of consent in a 'time-based' manner - in hours, days, or months - was consistently more effective.

We recommend comminicating the duration of consent in a time-based manner to increase consumer comprehension, e.g. '*We will have access to your data for 3 hours.*'

"It's vague. If they're accessing it one time, but they're making a billion copies of it… it's kind of like giving information away for free. I don't approve of that."

Phase 5.3 Participant 14

"One-time access to me, I would assume they'd have access for that one application, once only, but how do you know they'll only access it once? How do you actually know there's a stop in place for that institution…"

Phase 5.3 Participant 16

Transactions +

How your data will be used

- We will use your data to process your tax return.

- We will store your data securely.

- We will have ongoing access to your data for **1 year**. This access will expire on **January 31st 2020**. We will collect your data daily, unless or until you revoke your consent.

- You may **revoke your consent** at any time.

Cancel   Confirm

Ongoing access

For the 'budgeting tool' scenario, consumers were asked to share their data for an ongoing duration of 1 year. Consumers tend to prefer this scenario as there was a definite date for when access would end (it was clearer than the 'once-off access').

For standardisation, memorability, and consistency, we recommend that consent expiration align to calendar dates rather than a number of days where possible. For example, if consent was granted on January 1st 2019, it should expire on January 1st 2020.

We preliminarily recommend that expiry notifications and any subsequent re-authorisation requests should be presented to the consumer well before expiration occurs. This will mitigate the risk that any delays to reauthorisation will negatively impact a consumer's access to a service. **NB** this specific recommendation is preliminary; more research needs to be conducted on the timing and presentation of re-authorisation requests to increase confidence in design decisions.

"What can happen in the 12 months the Budget Tool has my data?"

Phase 5.3 Participant 2

Transactions   +

How your data will be used

- We will use your data to process your tax return.

- We will store your data securely.

- We will have ongoing access to your data for **1 year**. This access will expire on **January 31st 2020**. We will collect your data daily, unless or until you revoke your consent.

- You may **revoke your consent** at any time.

[Cancel]   [Confirm]

Revoking consent

Participants need a clear explanation of what constitutes revocation. Understanding what happens to personal data after revocation is crucial to consumer adoption. Many participants expected revocation to cause sharing to cease and for all their shared data to be deleted. Over half of surveyed participants (54%) expected the same.

Some participants were concerned that their data may be handled differently after their sharing agreement expired. Participants generally expected the 'revoke your consent' link to actually revoke their consent (even though consent had not yet been granted).

We recommend:
- Add a link to *'find out more'*.
- Add *'You are able to revoke your consent at any time without penalty by going to settings>manage.'*

"The fact that it's there it's nice but it doesn't guarantee that it's going to get done."

Phase 5.3 Participant 16

"They'll stop accessing all my data. I would expect them to erase everything as well."

Phase 5.3 Participant 20

Transactions   +

_____

How your data will be used

- We will use your data to process your tax return.

- We will store your data securely.

- We will have ongoing access to your data for **1 year**. This access will expire on **January 31st 2020**. We will collect your data daily, unless or until you revoke your consent.

- You may **revoke your consent** at any time.

| Cancel | Confirm |

Revoking consent: Multi-channel options

Revoking consent is currently being conceived as a digital-only function. As the concept of sharing data is new, the perception of how access could be revoked was based on existing channels and past behaviours.

Most participant's would go to a non-digital channel to revoke their consent first, and it was common to expect an email to be a point of contact for revocation. Revocation via phone was the most likely channel to be sought, followed by in-person.

The location of revocation was mixed: some participants would go to the data recipient as that was the site of consent, others would go to the bank, and some would go to an ombudsman.

Although the consent model is being proposed as a digital-only interaction, having digital-only revocation limits accessibility and fails to align to current behaviours and expectations.

We recommend:
- Allowing initial revocation requests to be multi-channel, including non-digital channels
- Facilitating multi-channel revocation with consumer education, e.g. guiding the consumer through the digital revocation journey

"You should be able to do it however is easiest for you."

Phase 5.3 Participant 17

How your data will be used

- We will use your data to provide a once-off assessment of your income and expenses.
- We will store your data securely.
- We will have **one time** access to your
- We may share your data with an outsourced provider. **Find out more here.**

Back | Confirm

All participants were concerned about their data being shared with an outsourced provider

Participants assumed that an outsourced provider would be a telemarketing company, or an offshore agency, and all were concerned at the prospect of data being shared with an unspecified source. Participants wanted more information about the outsourced provider and why they needed access to the data, while others argued they would immediately cancel the consent process at this point. Others assumed that some use cases - like a credit application - would be done 'in-house' and shouldn't require an outsourced provider.
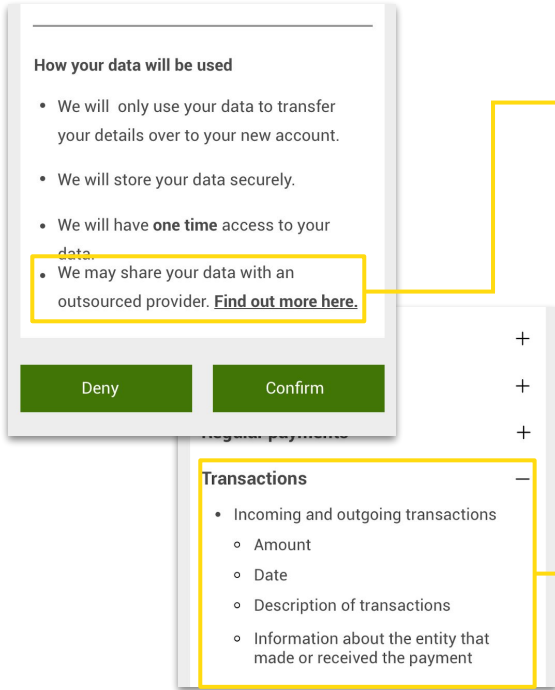
We recommend:
- Articulating that the outsourced provider(s) will be bound to the same data sharing agreement.
- Providing clear justification for using an outsourced provider, and access to further information about them.
- Placing this information first as it was seen as centrally important.

"It sounds like they can give it to anyone they wanted to. I'd be pretty uncomfortable with that."

Phase 5.3 Participant 14

"What is an outsourced provider? Would need to know more about why outsourced providers need that information before proceeding."

Phase 5.3 Participant 2

How your data will be used

- We will only use your data to transfer your details over to your new account.

- We will store your data securely.

- We will have **one time** access to your data.

- We may share your data with an outsourced provider. **Find out more here.**

Deny | Confirm

+
+
+

Regular payments

Transactions —

- Incoming and outgoing transactions
  - Amount
  - Date
  - Description of transactions
  - Information about the entity that made or received the payment

State timeframe for sharing to provide more clarity

Some participants noted that it was unclear how far back data would be shared, e.g. 3 months back vs. 10 years back. When surveyed, a large quantity of participants (35%) assumed that they had to share their entire transaction history.

We recommend:
- Stating clearly which period of time data will be shared from
- Applying the data minimization principle to the data time frame in the future *and* the past - third party providers should only request the time frame they require to provide the service, e.g. 1 year prior and post consent for an accounting tool.

"There's no time limit […] that's years and years of transactions"

Phase 5.3 Participant 19

The Accounting Tool

✓ Consent   ② Authenticate   ③ Confirm

Select your bank

Enter bank name 🔍

◆ Bank A

◆ Bank B

◆ Bank C

◆ Bank D

◆ Bank E
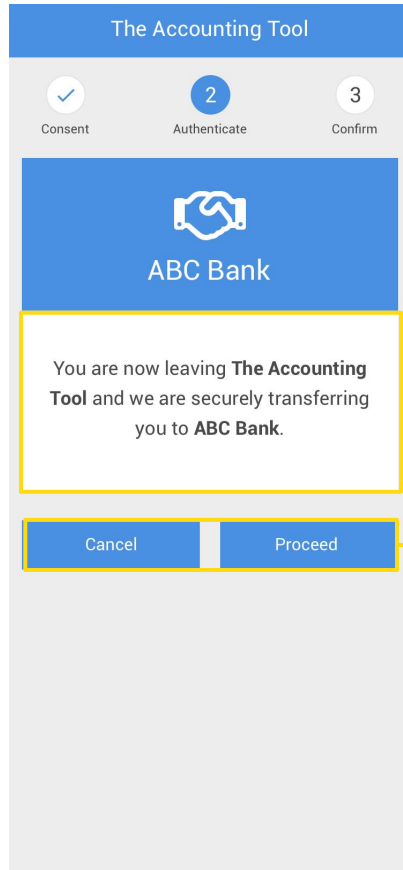
◆ Bank F

◆ Bank G

◆ Bank H

◆ Bank I

Cancel   Confirm

Indicate to consumers that only 1 bank can be chosen at a time

Some participants wanted the option to select multiple banks. Since this will not be possible for version 1 of the standards, the language should specify this. We recommend the following:

- *'Which bank would you like to share data from?'*
- *'If you want to share data from multiple banks you will have to go through this process multiple times.'*

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The Accounting Tool

✓ Consent   ② Authenticate   ③ Confirm

ABC Bank

You are now leaving **The Accounting Tool** and we are securely transferring you to **ABC Bank**.

Cancel   Proceed

Clearly communicate re-direction

To make the re-direct flow even clearer, we suggest further clarifying what the user has done and what will happen next. E.g. using the following language: *'You have agreed to share your banking information with [the data recipient]. You are now leaving [the data recipient] and will be transferred to [the data holder] to further confirm.'*

Include cancel / proceed buttons

Participants generally paused on this slide, requiring a bit of time to think about what was happening. Automatic redirection not recommended (both scenarios were tested).

ABC Bank

ABC Bank

ABC Bank Login

The Accounting Tool is requesting ongoing access to information from your bank account(s). To continue, please confirm your identity.

ABC Bank ID:

Password:

Cancel

Login

Forgotten your ABC Bank ID?
Forgotten your password?

Bank login must look familiar

The majority of participants understood that they were redirected to their bank add, though clear bank branding would increase consumer confidence as some participants were under the impression they were still on the data recipient app and were concerned that they were sharing their login details.

"At this point I'm pretty concerned because it's transferred me pretty quickly to my bank"

Phase 5.3 Participant 20

Indicate that third party provider cannot see login

Some participants feared that third party provider might be able to see login information. We suggest adding the sentence: *'[the data recipient] will not be able to see your login information."*

MESSAGES

ABC Bank
Your verification code is **234689**

Consent   Authenticate   Confirm

We have sent an SMS to your mobile.
Please enter it below.

Cancel   Next >

Two factor authentication is familiar and gives sense of security

All participants were familiar with the use of two factor authentication (2FA) through SMS and it gave many participants a stronger sense of security. Although SMS has been found to be the least secure 2FA, it still provides participants with a signal of confidence in the security of the transaction. We recommended continuing with this approach, at least for mobile interfaces.

"One thing that's really great now is that if we do banking there's generally a verification code, you'll have a verification code come through on your phone… you enter that in… it's a good safety net"

Phase 5.3 Participant 16

"I am used to seeing this. It's a well-known security measure."

Phase 5.3 Participant 6

"You know you're actually engaging in this activity… it's a verification system I suppose. Not some third party on the other side of the wall who's skimmed my card or whatever it is to acquire funds."

Phase 5.3 Participant 16

Repetition confusing to some

While the majority of participants recognised the need for repetition of the consent/confirm screen, it was confusing to others. We therefore **recommend using language to highlight that this is a confirmation of the previous consent step** - not a duplication.

We recommend:
- *'Have you agreed to share the following data from your bank account(s) with [the data recipient]?'*
- Possibly adding real customer data in some sections
- *Have you agreed that your information will be used in the following ways?*

"Again? We just did this?"

Phase 5.3 Participant 19

Follow recommendations from consent screens

As for the consent form (see p. X), we suggest:
- Splitting screen into two
- Updating the 'How your data will be treated' text, as described on page XXX.
- Ensure buttons reflect page intent

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ABC Bank

Consent ✓ | Authenticate ✓ | Confirm **3**

🛡

Select Accounts

Please select the account(s) you want to share with **The Accounting Tool**.

☐ Transaction account
80255 588622147

☐ Savings account
80255 685469955

‹ Back | Confirm ›

Minor language changes

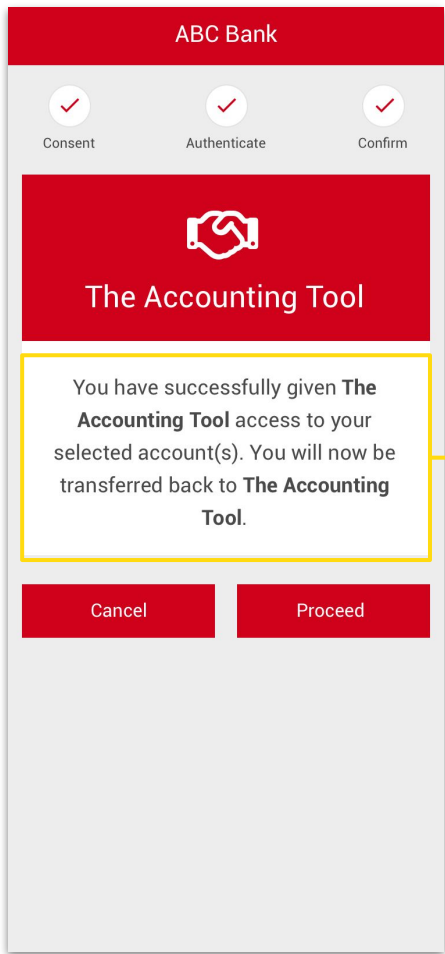*Select bank account instead of 'select account'*

"Which bank account(s) would you like to share data from?"

Account(s) selection appreciated

Many participants showed strong appreciation for this step as there were certain accounts that they did not want to share data from. For example, some did not want to share data from accounts setup for their children or accounts managed by work clients (e.g. by a lawyer).

Earlier account selection

To give participants a sense of security, it might be worthwhile having the account selection earlier, before confirming. Some participants mentioned it earlier in the process,

ABC Bank

✓ Consent   ✓ Authenticate   ✓ Confirm

The Accounting Tool

You have successfully given **The Accounting Tool** access to your selected account(s). You will now be transferred back to **The Accounting Tool**.

Cancel   Proceed

Rewording to reflect actions

As some participants felt they had not only given 3rd party provider access to their banking data, but also to their bank account (e.g. to transfer money), it is recommended to change the wording to the following to more accurately reflect what the consumer has just done.

We recommend:
"You have successfully shared data from your selected bank account(s) with [the data recipient]. You will now be transferred back to [the data recipient]"

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The Accounting Tool

We have successfully accessed your data.

Close | Proceed

Further confirmation and repetition of terms of use

Some participants could not remember the conditions of data sharing (e.g. how long the data would be shared for) immediately after finishing the consent flow. Participants were also interested in further confirmation that the data sharing had been successful. This could be through an email confirmation that the consumer could keep as a form of proof, which could also serve to close feedback loops and reduce uncertainty.

Recommendations:

- Provide off-screen communications and confirmations like email.
- Include confirmation that data was shared, the data sharing agreement and summary, and instructions for how to revoke consent.

Would like something to print, as assurance that transfer was successful. Otherwise feels like "it has gone into a black hole"

Phase 5.3 Participant 3

LANGUAGE
RECOMMENDATIONS

RECOMMENDATIONS
LANGUAGE

Based on 5.1 and 5.3 research, we have a reasonable level of confidence that the language on the next two slides for data clusters and permissions were able to be understood by research participants, with the exception of the language highlighted in red.

As all language was rapidly produced by the project team, we recommend that it be tested further, especially the highlighted language, and that a content designer be engaged to produce more accessible language.

DATA CLUSTER LANGUAGE	PERMISSION LANGUAGE	API END POINTS
Personal details	Name Occupation	Get Customer
Contact details	Phone number Email address Mail address Residential address	Get Customer Details
Account details	Name of account Type of account (i.e. loan or savings) Account number Account balance	Get Accounts Get Bank Balances Get Balances for Specific Accounts
Account features	Interest rates Fees Discounts Account terms Account mail address	Get Account Detail
Regular payments	Direct debits Scheduled payments List of accounts you make regular payments to Details of accounts you make regular payments to	Get Direct Debits For Account Get Bulk Direct Debits Get Direct Debits For Specific Accounts Get Payees Get Payee Detail

DATA CLUSTER LANGUAGE	PERMISSION LANGUAGE	API END POINTS
Transactions	**Incoming and outgoing transactions** **Amounts** **Dates** **Description of transactions** **Information about who you've sent money to, and who you've received money from**	Get Transactions For Account Get Transaction Detail Get Bulk Transactions Get Transactions For Specific Accounts
Company details	**Company name** **Company numbers (ABN or ACN)** **Charity status** **Establishment date** **Industry** **Organisation type** **Country of registration**	Get Customer
Company contact information	**Company address** **Mail address** **Phone number**	Get Customer Details

PROPENSITY TO SHARE

PROPENSITY TO **SHARE**

This section gives an overview of general participant attitudes towards data sharing, particularly the sharing of personal banking data. Aversion to sharing will be context dependent, and many of the participants we spoke to already shared their personal data, including their banking data.

We expect that consumer propensity to share data will depend on contextual value propositions from data recipients rather than the concept of the CDR itself. The Consumer Data Right is an enabler that can also help regulate data sharing and inform consumers about what they are already doing.

The consumer research showed that there is a strong variance in the propensity to share data; some participants were open to the concept provided there was a justification or benefit, while others were averse to the idea entirely.

Aversion seemed to be interconnected with more general views about data security and trust in government and banks, revealing a broader need to increase consumer trust and confidence in data security. Acknowledging and addressing these factors can help increase consumer trust in and adoption of the CDR.

The ACCC Rules cover many of the concerns in this section, and we recommend that data recipients and data holders communicate these Rules while also addressing other considerations.

OPEN TO SHARING BANK DATA

"In my view you either share or you don't. But if you're sharing, [then] your bank account details are the only sensitive thing. ABN and all that is just public knowledge."

"It makes me a bit uncomfortable, but we also share too much on Facebook."

- Phase 5.1 Participant 8

RELUCTANT TO SHARE TOO MUCH BANKING DATA

"I don't mind sharing bits of it, but I wouldn't ever share all of it in one hit."

"I only did the sharing [with Raiz], because this investment app got a big tick with an investment guru [Scott Pape, Barefoot Investor]."

- Phase 5.1 Participant 10

NEEDS CONVINCING TO SHARE BANKING DATA

"I can see a great distrust in the banks. It's going to be met with a great deal of disbelief. It's going to require a lot of convincing. I need to be convinced that the bank would not appropriate my data."

- Phase 5.1 Participant 5

FEARFUL OF SHARING ANY BANKING DATA

"Where I can, I pay cash, because it's not digitally traceable - so I limit the data the banks get."

"Because I'm tied in with Centrelink - they can access my account details, so I limit what happens in there. I'm not doing anything underhanded, but I don't want them to see my spending habits. I want them to respect my privacy."

- Phase 5.1 Participant 9

FEAR OF
SHARING BANKING DATA

- Driven by Facebook, Royal Commission, MyHealthRecord

- Driven by negative previous experiences

  - Stolen credit card information

  - Hacked Twitter / Instagram / Netflix

  - Lost Centrelink benefits

- Nearly 63% of respondents mentioned security as a critical concern, and 37% were worried about who would have access to their data.

- 39% of respondents didn't trust the security of their financial data with any of the listed organisation types.

"On a personal level I've been burned before... I'm very careful with what I share."

- Phase 5.1 Participant 9

82

FEAR OF
SHARING BANKING DATA

- Strong fear from two **Centrelink** users

  - Previous **experience**

  - Significant **consequences**: Opal card, rates, discounts, etc.

"One person puts a red cross against your data and distribute across all levels and agencies."

- Phase 5.1 Participant 2

WILLINGNESS TO SHARE
DEPENDS ON CONTEXT

- **Who** the data is shared with

- **What** data is to be shared

- **Why** this data is being requested (what do they need it for?)

- **Purpose** of data sharing (e.g. loan application)

- **Prior knowledge** of the entity (e.g. recommendation)

- Whilst <u>39% of respondents said they wouldn't share their personal banking data</u> with companies outside their bank, 55% were willing if the benefit or purpose was clear.

"Some of it is dangerous sharing, but it depends on the application it's used for."

- Phase 5.1 Participant 9

REASON FOR INFORMATION REQUEST IS IMPORTANT

"I am a little bit of a privacy nerd. If you can't tell me what you are doing with it, then it'll be no thanks"

- Phase 5.3 Participant 8

"Why does an Accounting Tool need to know my occupation?"

- Phase 5.3 Participant 9

DEPENDS ON TRUSTED SOURCE ENDORSEMENT

- This applies to trust in the data holder, the data recipient and the process itself

- Trusted sources include:

    - Social (friends, family, online reviews)
    - Relevant authority (e.g. Barefoot investor)
    - Government endorsement (official seal) **_for some_**...but do not imply Government can access or store the data
    - Bank endorsement (due to regulation)
    - A universal symbol of security- ie: a padlock

WILLINGNESS TO SHARE DEPENDS ON TRUST

"I'd need to think very carefully based on the organisation, what they do, what I know about them.
The reality is that you and I know we don't always
get the truth."

- Phase 5.3 Participant P11

"If I had some sort of article or background information it will make me trust it more."

- Phase 5.3 Participant P20

SENSITIVE
INFORMATION

- Account numbers   *would give away power*

- Mailing address   *is this needed?*

- Occupation   *not anyone's business*

- Account balance   *too personal to Centrelink user*

"Certainly **not** account numbers. That's out."

- Phase 5.1 Participant 10

PRIVACY IMPORTANT AROUND PERSONAL BEHAVIOUR

"It's not your business to know what I'm spending, generally."

- Phase 5.3 Participant 12

"My banking details are equated with my very personal things.
[I place] **more value on this than data shared on social media."**

- Phase 5.3 Participant 10

MITIGATION
STRATEGIES

- Several participants do banking **(mostly) on computer** - it's harder to lose a computer than a phone

- One participant takes **screenshots** of all transactions

- One participant has 3 types of **cyber security software** on his computer

"I definitely feel safer using it on a computer that's because we have an anti virus software. On the phone I don't have anti virus software"

Phase 5.3 Participant 20

BANKING ON COMPUTER VS SMARTPHONE

"I almost exclusively do my banking online, mostly on my computer. Having it on my phone is too risky. It's too easy to crack my phone if I leave it somewhere."

- Phase 5.3 Participant 5

"I might lose my phone, but I'll never lose my laptop."

- Phase 5.3 Participant 9

PROPENSITY TO SHARE DATA

Sharing personal data to access a product or service is a value exchange. The participants of this research needed to understand the value they'd receive before considering sharing financial information. They also needed to understand who their data would be shared with, to what extent, and for what purpose.

Next steps
The participants in this research were skewed toward older Australians, those who had experienced financial distress, and late adopters of technology. This has given us insight into some of these more critical needs and addressing their needs will facilitate CDR adoption more widely.

Before release, however, Tobias recommends conducting research with early adopters to understand their particular needs and motivations, as they will be the first to use this service.

Tobias also recommends conducting further research after consumers have had experience with the Consumer Data Right, to refine the experience and ensure late adopters are more comfortable using it. Reputation will also be paramount in communicating the CDR. Endorsement by Government, industry, figures of authority, and peers will facilitate adoption.

NEXT STEPS

NEXT STEPS
OVERVIEW

This section covers the gaps, limitations, and possibilities for the CX Workstream. These recommendations were produced by Tobias in conjunction with Data61 and CHOICE, but need to considered by Data61, ACCC, Treasury before any direction is taken. As such, **these recommendations represent preliminary and ideal considerations rather than the actual next steps for the CX Workstream.**

ACCC and Data61 are currently exploring the need to conduct further research based on these recommendations, broader considerations, and other program requirements. They will consider further research and testing for a version 2 of the Consent Flow (consent, authenticate, authorise), including to test any proposed redirect flows.

There is also a recognised need to conduct research on consent/authorisation management and revocation, re-authorisation, joint accounts, 90 day notification(s), and communicating accreditation. These also need to be expanded to accommodate the energy and telecommunication sectors. These and other requirements are being considered in upcoming work.

Although further research does not require large samples, it will expand consumer representation. And while participant insights from Phase 1 will facilitate wider CDR adoption more widely, there is a recognised need to recruit more Early Adopters in upcoming work as they are expected to participate in the CDR regime first.

RESEARCH
LIMITATIONS

The research undertaken was designed to a fixed release date in July. This time constraint created a number of limitations:

- **Number of participants (and diversity achieved e.g. overweighted with financial distress, underweighted with disabilities and ESL)**

- **Consumer awareness of the Consumer Data Right / Open Banking**

- **Missing input from banks and third party providers**

- **Pre-defined APIs and language (not aligned with UK language)**

- **Availability of consumers and Data61 staff due to Christmas**

- **Ongoing scope adaptations**

RESEARCH
GAPS

While Phase 1 fulfilled many of the requirements for the Consent Flow, there are still notable gaps in consumer representation, accessibility, scenarios, and basic requirements that must be investigated to develop a comprehensive Consent Model.

ACCC and Data61 acknowledge the need to investigate these areas and are currently exploring plans for further research.

Noted gaps include:

- Re-Authorisation

- Consent/authorisation revocation

- Consent/authorisation management

- 90 Day authorisation notification

- Redirect model(s)

- Joint accounts and delegates

- Minors (not in scope for version 1 of CDR)

- Accessibility (visual / audio modes of consent)

- Multiple languages

- Limited use cases

- Future CDR sectors

IMMEDIATELY

	V2 of foundational consent flow	Manage, Revoke, Re-Authorise	Co-design models with banks & third parties
Description	Conduct further research with a broader spectrum of Australian consumers and consumer groups to validate and further refine language and payloads.	Design and test re-consent and consent withdrawal flows with Australian consumers.	Co-design recommendations for CX guidelines in collaboration with banks and third party providers.
Output	Refined language and payloads tested and validated by a broad spectrum of the Australian population.	Recommendations for design of re-consent and consent withdrawal flows to be included in CX guidelines.	Recommendations for improving CX guidelines drawing on research conducted by banks and third party providers. Increased and broader ownership of CX guidelines.
Duration	6 - 8 weeks	6 - 8 weeks	12 - 16 weeks

EXPAND REACH

	Design for accessibility	Joint accounts, minors & delegates
Description	Develop and test consent flows that support a range of accessibility needs, i.e. visual and audio consent flows.	Conduct research to explore needs and expectations for open banking in cases of joint accounts, minors and delegates. Develop and test consent models targeting needs and expectations identified.
Output	Recommendations for using non text-based consent flows to support accessibility.	Recommendations for implementation of open banking in cases of shared accounts, minors and delegates and prototyped consent models.
Duration	4 - 6 weeks	8 - 10 weeks

ADAPT

	Evaluate emerging consent models	Evaluate consumer experience of consent
Description	Conduct research to map the language and consent models used by banks and third party providers in the implementation of Open Banking and how they align to the CX guidelines.	Conduct research with users of open banking to explore their experience of providing consent, their awareness of what they have consented to and perception of potential consequences.
Output	Recommendations for improving CX guidelines drawing on actual launched consent models.	Recommendations for improving the CX guidelines drawing on actual consumer experiences and perceptions.
Duration	4 - 6 weeks	4 - 6 weeks

MANAGE & SCALE

	Centralised consent management	Expand to apply to telecom & energy sectors
Description	Conduct research and develop prototypes to test the need for a central consent management platform and how such a platform might look.	Conduct research to explore changes needed to adapt ACCC rules and CX guidelines to the context of the telecom and energy sectors.
Output	Recommendations for the need for and design of a centralised consent management platform.	Recommendations for how to adapt language and consent models for CDR implementation in the telecom and energy sectors.
Duration	8 - 10 weeks	12 - 14 weeks

VERSION 2 of
FOUNDATIONAL CONSENT FLOW

Rationale

The research conducted to date has been subject to important constraints, e.g. time, the number of participants involved and thus the diversity of participants (e.g. location, age, cultural and linguistic diversity, disabilities) and APIs being pre-defined.

Due to these limitations, Tobias suggest further research is conducted to refine the recommended language and payloads and validate it, using a second version of the prototype, with a broader and more diverse set of the Australian population.

Proposed approaches

- Review of language and payloads currently used by Australian banks and financial institutions

- Consultation with consumer groups, e.g. Financial Rights Legal Centre (FRLC)

- Interviews to test proposed language and payloads

- A national quantitative survey to validate proposed language and payloads

MANAGE, REVOKE & RE-AUTHORISE

Rationale

Re-consent and consent withdrawal have been outside the scope of this initial research, however, the language and flows used as part of these processes will strongly influence consumer control (and perceived control) of their banking data.

To ensure strong consumer control, Tobias suggest conducting further research and prototype testing to develop recommendations for language and flows associated with re-consent and consent withdrawal.

Proposed approaches

- Map and analyse re-consent and consent withdrawal models implemented in UK

- Develop re-authorisation notifications, consent/authorisation management dashboards, and revocation standards for data recipients and data holders.

- Test prototypes with a spectrum of Australian consumers and consumer organisations

- Design and test 90 day notifications

CENTRALISED CONSENT MANAGEMENT

Rationale

Depending on the uptake of CDR, active users might find it challenging to gain an overview of and manage their consent. This will especially be the case as the scheme is implemented across sectors (i.e. banking, energy and telco).

The majority of respondents to the survey were unsure where they might expect to find a list of all the organisations they had shared their data with, however, less than 10% believed there would not be a centralised place for managing this.

To ensure consumers remain in control of their data and consents, Tobias suggests exploring the opportunity and need for launching a centralised consent management platform at a point in the future.

Proposed approaches

- Interview banks, energy and telco providers to gauge interest in platform

- Interview early adopters of CDR to gauge their need for and interest in platform

- Co-design platform and content in collaboration with banks, energy and telco providers and consumers

- Develop and test a prototype of a consent management platform

CO-DESIGN CONSENT MODELS
WITH BANKS & THIRD PARTIES

Rationale

Australian banks have already conducted independent research and developed prototypes to inform their implementation of open banking. Findings from these efforts could be leveraged in the development of the CX guidelines.

Tobias suggest engaging banks and third party providers in co-designing the CX guidelines, first of all, to leverage available research and, secondly, to develop ownership of the guidelines and thus increase the likelihood of active uptake.

Proposed approaches

- A series of co-design workshops with key stakeholders from banks and 3rd parties:
    - A workshop to share research findings and build trust
    - A workshop to discuss and develop standard language
    - A workshop to discuss and develop consent models (incl. re-consent and consent withdrawal)

DESIGN FOR WIDER
ACCESSIBILITY

Rationale

During the initial research diversity was sought among research participants, however, focus was on developing written and English language consent language and model.

To ensure open banking is accessible to Australian's with specific accessibility needs,, Tobias suggest conducting further research to explore, i.e. visual and audio consent flows and consent in languages other than English (e.g. Mandarin and Arabic).

Proposed approaches

- Develop prototypes adapting existing consent language and consent model to multiple languages

- Develop visual and audio consent prototypes

- Test prototypes with Australian consumers with specific accessibility and language needs

JOINT ACCOUNTS, MINORS & DELEGATES

Rationale

Joint accounts, accounts held by minors, and accounts controlled by delegates (e.g. accountants) are complex yet common account types and should be designed for. Joint accounts are in scope for version 1 and we strongly recommend that research be conducted to explore the needs, considerations, and scenarios of use for joint accounts.

Whilst larger financial institutions have policies and procedures for dealing with delegated authority, Tobias believes that smaller institutions, third parties and the industry in general would benefit from standardised guidance.

Tobias suggests conducting further research and testing to explore changes needed for the consent model to deal with these alternatives account types.

Proposed approaches

- Conduct research with banks and consumers to explore the needs and expectations of holders of shared account, guardians of minors and owners of accounts controlled by delegates

- Develop and test a range of consent models to identify consent models for complex account types preferred by consumers

EVALUATE EMERGING
CONSENT MODELS

Rationale

The implementation of Open Banking in UK demonstrated how, despite the creation of CX guidelines, banks and third parties chose different solutions to consumer consent, authentication and authorisation. The usability of these models naturally differ.

Tobias suggest running a pilot and conducting a comprehensive study to map and evaluate the consent models emerging in Australia post-pilot to inform further refinement of the CX guidelines. This allows this initial implementation to be a test bed and foundation for further innovation.

Proposed approaches

- Map consent models implemented by banks and third party providers and outline differences and similarities

- Test spectrum of consent models with Australian consumers to explore usability and consumer comprehension

ADAPT to
TELCO & ENERGY

Rationale

The implementation of CDR in banking provides a unique opportunity to learn and adapt the recommended consent model before CDR is extended to other sectors.

To avoid working towards a tight timeframe and avoid developing a consumer experience within predefined technical limitations, Tobias suggest starting the research and testing needed to adapt the proposed consent model and overall consumer experience, early.

Proposed approaches

- Map the language currently used within the telco and energy sectors

- Engage key stakeholders from telco and energy sectors to develop consumer facing data language and data clusters

- Test the designated data and language with a spectrum of consumers, through interviews & surveys

- Develop and test consent models incorporating proposed language

- Explore consumer appetite in these sectors, including a focus on trust and privacy.
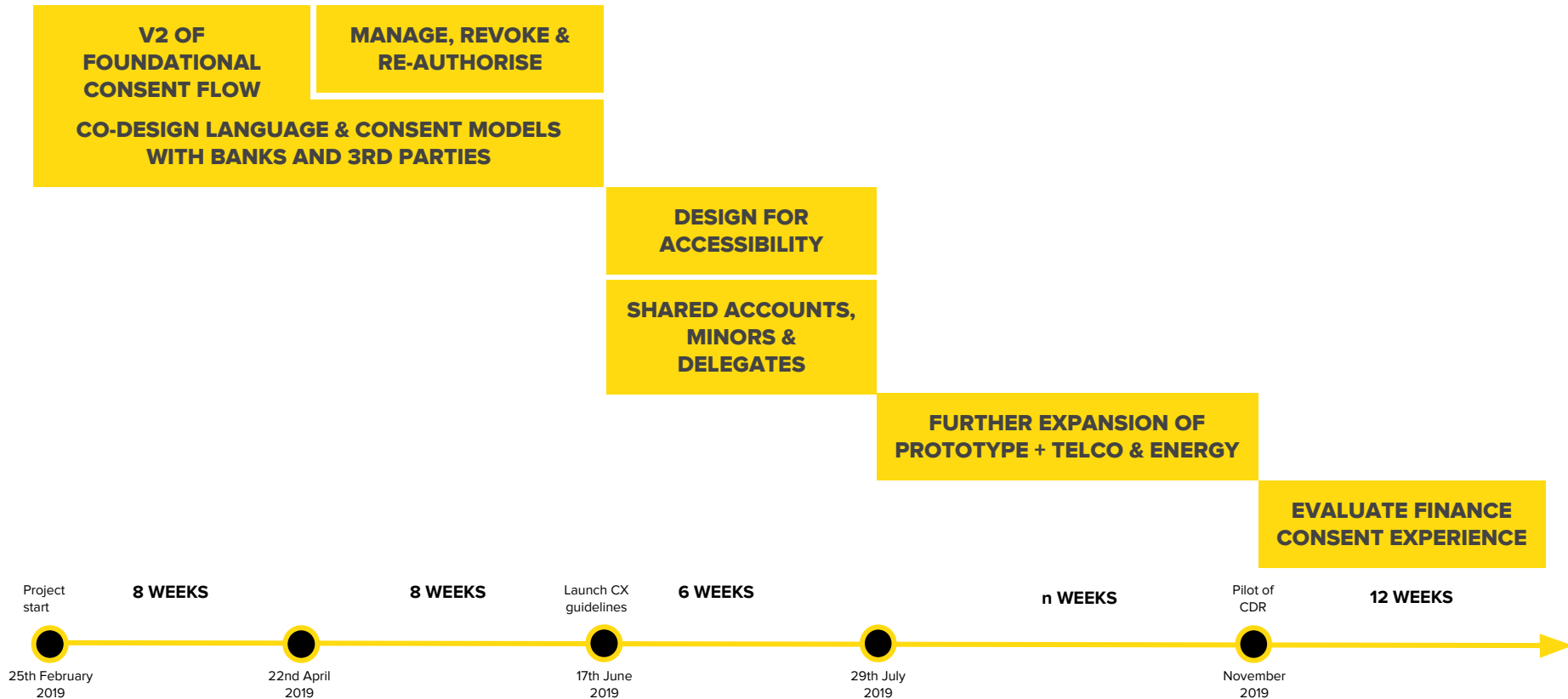
FINANCIAL CONSENT EXPERIENCE

Rationale

The staged implementation of CDR in Australia provides a unique opportunity to adopt the CX guidelines based on actual use cases and experiences of early adopters.

Taking advantage of this opportunity Tobias suggest using the pilot implementation of CDR to evaluate consumer experience of consent models and adapt CX guidelines accordingly.

Proposed approaches

- Conduct interviews with early adopters to explore the consumer experience of consent models based on actual use cases

- Launch a national survey targeting early adopters of CDR

- *If possible, this research could be conducted in collaboration with banks and 3rd party providers*

ROAD MAP

V2 OF FOUNDATIONAL CONSENT FLOW

MANAGE, REVOKE & RE-AUTHORISE

CO-DESIGN LANGUAGE & CONSENT MODELS WITH BANKS AND 3RD PARTIES

DESIGN FOR ACCESSIBILITY

SHARED ACCOUNTS, MINORS & DELEGATES

FURTHER EXPANSION OF PROTOTYPE + TELCO & ENERGY

EVALUATE FINANCE CONSENT EXPERIENCE

Project start	**8 WEEKS**		**8 WEEKS**	Launch CX guidelines	**6 WEEKS**		**n WEEKS**	Pilot of CDR	**12 WEEKS**

25th February 2019   22nd April 2019   17th June 2019   29th July 2019   November 2019

APPENDICES

LANGUAGE

UK LANGUAGE & PAYLOADS

Data Cluster Language	Permissions Language	Information Available	API End Points
Your Account Details	Any other name by which you refer to this account	• Currency of the account • Nickname of account (E.g. 'Jakes Household account')	Accounts
	Your account name, number and sort-code	• Account Name • Sort Code • Account Number • BAN • Roll Number (used for Building Society)	Accounts
	Your account balance	• Amount, Currency • Credit/Debit • Type of Balance • Date/Time • Credit Line	Balances
	Your card number	• PAN masked or unmasked depending on how ASPSP displays online currently	All where PAN is available

Data Cluster Language	Permissions Language	Information Available	API End Points
Your Regular Payments	Payee agreements you have set up	• List of Beneficiaries	Beneficiaries
	Details of Payee agreements you have set up	• Details of Beneficiaries account information (Name, Sort Code, Account) • (plus all data provided in Beneficiaries Basic)	Beneficiaries
	Your Standing Orders	• SO Info • Frequency • Creditor Reference Info • First/Next/Final Payment info	Standing Orders
	Details of your Standing Orders	• Details of Creditor Account Information (Name, Sort Code, Account) (plus all data provided in Standing Order Basic)	Standing Orders
	Your Direct Debits	• Mandate info, Status, Name, Previous payment information	Direct Debits
	Recurring and future dated payments	• Scheduled dates, amount, reference. Does not include information about the beneficiary	Scheduled Payments
	Details of recurring and future dated payments	• Scheduled dates, amount, reference. Includes information about the beneficiary	Scheduled Payments

Data Cluster Language	Permissions Language	Information Available	API End Points
Your Account Transactions	Your incoming transactions	• Transaction Information on payments made into the customer's account (Reference, Amount, Status, Booking Data Info, Value Date info, Transaction Code). Does not include information about the entity that made the payment	Transactions
	Your outgoing transactions	• Same as above, but for debits	Transactions
	Details of your incoming transactions	• Transaction Information on payments made into the customer's account (Reference, Amount, Status, Booking Data Info, Value Date info, Transaction Code). Includes information about the entity that made the payment	Transactions
	Details of your outgoing transactions	• Same as above but for debits	Transactions
Your Statements	Information contained in your statement	• All statement information excluding specific amounts related to various balance types, payments due etc.	Statements
	Details of information contained in your statement	• All statement information including specific amounts related to various balance types, payments due etc.	Statements

Data Cluster Language	Permissions Language	Information Available	API End Points
Your Account Features & Benefits	Product details - fees, charges, interest, benefits/rewards	• Refers to customer account product details defined in the Open data API (the fees, charges, interest, benefits/rewards)	Products
	Offers available on your account	• Balance transfer, promotional rates, limit increases, start & end dates	Offers
Your Contact Details	Your address, telephone numbers and email address as held by your bank/card issuer	• Address, telephone numbers and email address as held by your bank/card issuer, party type (sole/joint etc.)	Party

D61 LANGUAGE & PAYLOADS

Scope	Data Cluster Language	Information Available	API End Points
Basic Bank Account Data	List of your accounts with their balances	• Account nickname • Account balance • Product Category (loan, TD, etc) • Masked Account Number	Get Accounts
	(See previous text for Basic Bank Account Data)	• Account balance • Credit Limit (where applicable) • Currency for balance	Get Bulk Balances Get Balances For Specific Accounts
	(See previous text for Basic Bank Account Data)	• Payee nickname • Payee description	Get Payees
Detailed Bank Account Data	Details of your accounts including account numbers, terms, rates, fees and mailing address	• (Includes Basic Account Data) • Rates • Fees • Discounts • Mailing address • TD maturity details • Credit card payment details • Loan terms • List of payees (without detail) • Direct Debit Authorisations	Get Account Detail
		• Authorised entity for debit • Last direct debit date • Last direct debit amount	Get Direct Debits For Account Get Bulk Direct Debits Get Direct Debits For Specific Accounts
Bank Payee Data	Details of your registered payment recipients and billers	• Domestic payee account numbers • International payee account numbers • International payee bank details • BPAY biller details	Get Payee Detail

Scope	Data Cluster Language	Information Available	API End Points
Bank Transaction Data	List of transactions for your accounts including reference information and transaction amounts	• Transaction status • Transaction description • Transaction Date • Transaction Type • Amount • Currency • Reference • Extended data for NPP payments	Get Transactions For Account Get Transaction Detail Get Bulk Transactions Get Transactions For Specific Accounts

Basic Customer Data	*For retail customer:*
	Your name and occupation
	
	For business customer:
	Your name and role along with details of your company
		• *For retail customer:*
		    ○ Name
		    ○ Occupation code
		
		• *For business customer:*
		    ○ Agent name
		    ○ Agent role
		    ○ Company name
		    ○ Company numbers (ABN or ACN)
		    ○ Charity status
		    ○ Establishment date
		    ○ Industry
		    ○ Organisation type
		    ○ Country of registration
			Get Customer

Detailed Customer Data	*For retail customer:*
	Your contact details including phone number, email and address
	
	For business customer:
	The mailing address for your company
		• *For retail customer:*
		    ○ (basic customer data)
		    ○ Phone numbers
		    ○ Email addresses
		    ○ Mailing addresses
		
		• *For business customer:*
		    ○ (basic customer data)
		    ○ Mailing addresses
			Get Customer Detail

Scope	Data cluster language		Information Available
Basic Bank Account Information	List of your accounts with their balances		Account nickname Account balance Product Category (loan, TD, etc) Masked Account Number
			Account balance Credit Limit (where applicable) Currency for balance
			Payee nickname Payee description
Detailed Bank Account Information	Details of your accounts including account numbers, terms, rates, fees and mailing address		(Includes Basic Account Data) Rates Fees Discounts Mailing address TD maturity details Credit card payment details Loan terms List of payees (without detail) Direct Debit Authorisations
			Authorised entity for debit Last direct debit date Last direct debit amount

Scope	Data cluster language		Information Available
Bank Payee Details	Details of your registered payment recipients and billers		Domestic payee account numbers International payee account numbers International payee bank details BPAY biller details
Direct debits / automatic payments			

Scope	Data cluster language		Information Available
Bank transactions	List of transactions for your accounts including reference information and transaction amounts		Transaction status Transaction description Transaction Date Transaction Type Amount Currency Reference Extended data for NPP payments
Your basic contact information	**For retail customer:** Your name and occupation For business customer: Your name and role along with details of your company		**For retail customer:** Name Occupation code **For business customer:** Agent name Agent role Company name Company numbers (ABN or ACN) Charity status Establishment date Industry Organisation type Country of registration

Scope	Data cluster language
Your detailed contact information	**For retail customer:** Your contact details including phone number, email and address For business customer: The mailing address for your company

Information Available
For retail customer: (basic customer data) Phone numbers Email addresses Mailing addresses **For business customer:** (basic customer data) Mailing addresses

Scope	Data cluster language	Suggested data cluster language	Suggested permission language	Information Available	Suggested alterations to information available
Basic Bank Account Information	List of your accounts with their balances	List of your accounts and their balances	Name you have given this account Account number and type Balance of your account	Account nickname Account balance Product Category (loan, TD, etc) Masked Account Number	Account nickname Account balance Product category (loan, term deposit, etc) Account number
			Balance of your account Credit limit Account currency	Account balance Credit Limit (where applicable) Currency for balance	Account balance Credit limit Currency of account balance
			Basic payee information	Payee nickname Payee description	Payee nickname Payee description
Detailed Bank Account Information	Details of your accounts including account numbers, terms, rates, fees and mailing address	Details of your accounts	(everything in basic bank info) Product details - Rates, fees, discounts, loan and credit card terms	(Includes Basic Account Data) Rates Fees Discounts Mailing address TD maturity details Credit card payment details Loan terms List of payees (without detail) Direct Debit Authorisations	Interest rates Account fees Loan discounts Your mailing address Term Deposit maturity details Credit card payment details Loan terms
			Direct debits	Authorised entity for debit Last direct debit date Last direct debit amount	Authorised entity for direct debit Last direct debit date Last direct debit amount

Scope	Data cluster language	Suggested data cluster language	Suggested permission language	Information Available	Suggested alterations to information available
Bank Payee Details	Details of your registered payment recipients and billers	Details of your registered payment recipients and billers	Payee details BPAY biller details	Domestic payee account numbers International payee account numbers International payee bank details BPAY biller details	Domestic payee account numbers International payee account numbers International payee bank details BPAY biller details
Direct debits / automatic payments					List of direct debit payees without detail
		Automatic payments	Recurring and future dated payments		Scheduled direct debit dates, amounts and reference, NOT including information about the beneficiary
			Details of recurring and future dated payments		Scheduled direct debit dates, amounts, reference and information about the beneficiary

Scope	Data cluster language	Suggested data cluster language	Suggested permission language	Information Available	Suggested alterations to information available
Bank transactions	List of transactions for your accounts including reference information and transaction amounts	List of transactions for your accounts including reference information and transaction amounts	Incoming transactions Outgoing transactions Details of incoming transactions Details of outcoing transactions	Transaction status Transaction description Transaction Date Transaction Type Amount Currency Reference Extended data for NPP payments	Transaction status Transaction description Transaction date Transaction type Transaction amount Transaction currency Transaction reference Detailed transaction description for PayID payments
Your basic contact information	**For retail customer:** Your name and occupation For business customer: Your name and role along with details of your company	Your basic contact information	**Retail customer:** Your name and occupation **For business customer:** Your name and role Company details	**For retail customer:** Name Occupation code **For business customer:** Agent name Agent role Company name Company numbers (ABN or ACN) Charity status Establishment date Industry Organisation type Country of registration	**For retail customer:** Legal name Occupation code **For business customer:** Company agent name Company agent role Company name Company numbers (ABN or ACN) Charity status Company establishment date Industry of company Organisation type Country of company registration

Scope	Data cluster language	Suggested data cluster language	Suggested permission language	Information Available	Suggested alterations to information available
Your detailed contact information	**For retail customer:** Your contact details including phone number, email and address For business customer: The mailing address for your company	Your detailed contact information	**For retail customer:** Your phone numbers Your email addresses Your mailing addresses **For business customer:** Your name and role Company details, including mailing addresses	**For retail customer:** (basic customer data) Phone numbers Email addresses Mailing addresses **For business customer:** (basic customer data) Mailing addresses	**For retail customer:** (basic customer data) Phone numbers Email addresses Mailing addresses **For business customer:** (basic customer data) Business mailing addresses

TESTED
LANGUAGE

DATA CLUSTER LANGUAGE	PERMISSION LANGUAGE	INFORMATION AVAILABLE
List of your accounts and their balances	Name you have given this account Account number and type Balance of your account	Account nickname Account balance Product category (loan, term deposit, etc) Account number
	Balance of your account Credit limit Account currency	Account balance Credit limit Currency of account balance
	Basic payee information	Payee nickname Payee description
Details of your accounts	(everything in basic bank info) Product details - Rates, fees, discounts, loan and credit card terms	Interest rates Account fees Loan discounts Your mailing address Term Deposit maturity details Credit card payment details Loan terms
	Direct debits	Authorised entity for direct debit Last direct debit date Last direct debit amount
Details of your registered payment recipients and billers	Payee details BPAY biller details	Domestic payee account numbers International payee account numbers International payee bank details BPAY biller details
		List of direct debit payees without detail

TESTED
LANGUAGE

DATA CLUSTER LANGUAGE	PERMISSION LANGUAGE	INFORMATION AVAILABLE
Automatic payments	Recurring and future dated payments	Scheduled direct debit dates, amounts and reference, NOT including information about the beneficiary
	Details of recurring and future dated payments	Scheduled direct debit dates, amounts, reference and information about the beneficiary
List of transactions for your accounts including reference information and transaction amounts	Incoming transactions Outgoing transactions Details of incoming transactions Details of outgoing transactions	Transaction status Transaction description Transaction date Transaction type Transaction amount Transaction currency Transaction reference Detailed transaction description for PayID payments
Your basic contact information	**Retail customer:** Your name and occupation **For business customer:** Your name and role Company details	**For retail customer:** Legal name Occupation code **For business customer:** Company agent name Company agent role Company name Company numbers (ABN or ACN) Charity status Company establishment date Industry of company Organisation type Country of company registration

TESTED
LANGUAGE

DATA CLUSTER LANGUAGE	PERMISSION LANGUAGE	INFORMATION AVAILABLE
Your detailed contact information	**For retail customer:** Your phone numbers Your email addresses Your mailing addresses **For business customer:** Your name and role Company details, including mailing addresses	**For retail customer:** (basic customer data) Phone numbers Email addresses Mailing addresses **For business customer:** (basic customer data) Business mailing addresses

5.1 RESEARCH TOOLS

INTERVIEW
OUTLINE

https://docs.google.com/document/d/1cZ5nt1-GLddSI8tsCKFnFPNbo-CKhyfoADxtuinhG2U/edit?usp=sharing

OPEN CARD SORT

OptimalSort
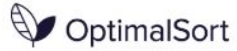
Leave a comment   Finished

Details of incoming transactions

Details of outgoing transactions

Payee details

Your email addresses

Basic payee information

Balance of your account

Recurring and future dated payments

Account number and type

Name you have given this account

Your phone numbers

Your occupation

Credit limit

Incoming transactions

Your name

Your mailing addresses

Product details - rates, fees,
discounts, loan and credit card terms

21 of 21 remaining

GOOGLE SHEET

Header	Description	Details
		Account nickname Account balance Product category (loan, term deposit, etc) Account number
		Account balance Credit limit Currency of account balance
		Payee nickname Payee description

GOOGLE SHEET

Header	Description	Details
		Interest rates
		Account fees
		Loan discounts
		Your mailing address
		Term Deposit maturity details
		Credit card payment details
		Loan terms
		Authorised entity for direct debit
		Last direct debit date
		Last direct debit amount

GOOGLE SHEET

Header	Description	Details
		List of direct debit payees without detail
		Scheduled direct debit dates, amounts and reference, NOT including information about the beneficiary
		Scheduled direct debit dates, amounts, reference and information about the beneficiary

GOOGLE SHEET

Header	Description	Details
		Transaction status
		Transaction description
		Transaction date
		Transaction type
		Transaction amount
		Transaction currency
		Transaction reference
		Detailed transaction description for PayID payments

GOOGLE SHEET

Header	Description	Details
		Legal name Occupation code
		Legal name Occupation code Phone numbers Email addresses Mailing addresses

CARD SORT

Male, 61, high income, no financial distress

Account Details   [3]

Account number and type

Balance of your account

Credit limit

Incomings   [2]

Incoming transactions

Details of incoming transactions

Outgoing   [8]

Basic payee information

Payee details

Direct debits

BPAY biller details

Details of outgoing transactions

Outgoing transactions

Recurring and future dated payments

Details of recurring and future dated payments

Personal   [7]

Name you have given this account

Your name

Your mailing addresses

Your occupation

Your email addresses

Account currency

Your phone numbers

Terms and Discounts/Rates   [1]

Product details - rates, fees, discounts, loan and credit card terms

P1 C E1 NFD

Male, 60s (?), low income, no financial distress

Banking Details `4`

Name you have given this account

BPAY biller details

Product details - Rates, fees, discounts, loan and credit card terms

Account number and type

Business `6`

Your role

Account currency

Company details, including email addresses

Basic payee information

Company details

Payee details

Details - Outgoings `3`

Details of outgoing transactions

Details of recurring and future dated payments

Direct debits

Income `1`

Incoming transactions

Income - Details `1`

Details of incoming transactions

Outgoings `2`

Outgoing transactions

Recurring and future dated payments

Personal `3`

Your name

Credit limit

Balance of your account

P2 B E1 NFD 140

Male, 50s (?), medium income, financial distress

Account information [5]

Product details - Rates, fees, discounts, loan and credit card terms

Credit limit

Account currency

Name you have given this account

Account number and type

Biller and payee information [3]

BPAY biller details

Basic payee information

Payee details

Company information [4]

Company details

Company details, including email addresses

Your name

Your role

Record of transactions [8]

Direct debits

Details of recurring and future dated payments

Details of incoming transactions

Incoming transactions

Details of outgoing transactions

Outgoing transactions

Recurring and future dated payments

Balance of your account

Female, 18, low income, financial distress

Details of your account `5`

Account number and type

Balance of your account

Credit limit

Direct debits

Account currency

factors concerning your account `1`

Product details - rates, fees, discounts, loan and credit card terms

important information `6`

Your name

Your occupation

Your phone numbers

Your email addresses

Your mailing addresses

Name you have given this account

Payment types `2`

Recurring and future dated payments

Details of recurring and future dated payments

Your transactions `7`

Payee details

Basic payee information

Outgoing transactions

Details of outgoing transactions

Incoming transactions

Details of incoming transactions

BPAY biller details

P4 C E1 FD 142

Male, 64, low income, financial distress

bank info on the product · 2

Product details - rates, fees, discounts, loan and credit card terms

Account currency

Personal Identifiers · 6

Your name

Basic payee information

Your email addresses

Your mailing addresses

Your phone numbers

Your occupation

your financial situation in this account · 13

Account number and type

Name you have given this account

Credit limit

Outgoing transactions

Details of outgoing transactions

BPAY biller details

Direct debits

Incoming transactions

Details of incoming transactions

Payee details

Balance of your account

Recurring and future dated payments

Details of recurring and future dated payments

Account balance   6

Balance of your account

Incoming transactions

Details of incoming transactions

Outgoing transactions

Details of outgoing transactions

Account currency

Accounts   2

Account number and type

Name you have given this account

company detail   6

Company details

Your name

Your role

Payee details

Basic payee information

Company details, including email addresses

Payment   5

Details of recurring and future dated payments

Credit limit

Recurring and future dated payments

BPAY biller details

Direct debits

terms and conditions   1

Product details - Rates, fees, discounts, loan and credit card terms

P6 B E2 FD?

Male, 50, high income, no financial distress

bank info for transfer what it is. (8)

Outgoing transactions

Your name

Direct debits

Balance of your account

Credit limit

Account number and type

Incoming transactions

Product details - rates, fees, discounts, loan and credit card terms

privacy issues. Do they really need? (5)

Your phone numbers

Your occupation

Your email addresses

Your mailing addresses

Name you have given this account

depending what the needs are? Or why is this needed. (8)

Details of incoming transactions

Payee details

Recurring and future dated payments

Details of outgoing transactions

Account currency

Basic payee information

BPAY biller details

Details of recurring and future dated payments

P7 C E1 NFD 145

Female, 40s/50s (?), medium income, financial distress

Account Summary (7)

Account number and type

Balance of your account

Name you have given this account

Incoming transactions

Outgoing transactions

Credit limit

Account currency

detailed information after clicking (6)

Details of incoming transactions

Recurring and future dated payments

Direct debits

Details of outgoing transactions

Details of recurring and future dated payments

Product details - Rates, fees, discounts, loan and credit card terms

Transfer to other accounts (3)

Basic payee information

Payee details

BPAY biller details

User profile/contact details (4)

Your name

Company details

Your role

Company details, including email addresses

P8 B E2 FD 146

Credit Limit/Data [1]

Credit limit

Expidenture [5]

Direct debits

Outgoing transactions

BPAY biller details

Details of recurring and future dated payments

Details of incoming transactions

Personal Details [7]

Your name

Your email addresses

Your mailing addresses

Your occupation

Your phone numbers

Name you have given this account

Account number and type

Unknown/too vague [8]

Product details - rates, fees, discounts, loan and credit card terms

Account currency

Balance of your account

Payee details

Basic payee information

Recurring and future dated payments

Incoming transactions

Details of outgoing transactions

Female, 50, low income, no financial distress

Personal details `11`

Your name

Your occupation

Your mailing addresses

Your email addresses

Your phone numbers

Product details - rates, fees, discounts, loan and credit card terms

Payee details

Basic payee information

Account number and type

Account currency

Credit limit

Account details `6`

Name you have given this account

Balance of your account

Outgoing transactions

Incoming transactions

Details of incoming transactions

Details of outgoing transactions

Bill paying `4`

Recurring and future dated payments

Details of recurring and future dated payments

Direct debits

BPAY biller details

EXCEL EXERCISE

RESULTS of
EXCEL EXERCISE

https://docs.google.com/spreadsheets/d/1ThjKkbP3PaAXfyi0VglMI0VE9DWd0aDLic7ZiX2Xcto/edit#gid=1595768530

CONSUMER SURVEY

RAW DATA
CONSUMER SURVEY

https://docs.google.com/spreadsheets/d/16SGJCbB-WAFyNiwzaC1_YNjMCDafVTiGciEyRC8_xpU/edit#gid=0*

If you cannot access the link, please contact the Consumer Data Standards CX working group for access to the survey raw data (cdr-data61@csiro.au)

Q1

Please review the information below. I acknowledge that: I have agreed to participate in the above project being conducted by CSIRO, Data61. I have been provided with information about the project and had any questions regarding my participation and any associated risks and benefits answered to my satisfaction. I understand that my participation in this research will involve me answering questions in a short survey that should take no more than 30 minutes to complete. I have been provided with contact details of the researcher and understand that I can contact them at any point during the study. I have also been provided with the contact details of an independent ethics officer at CSIRO should I wish to raise any concerns or complaints about the conduct of the research. I understand that my participation in the project is entirely voluntary and that I am free to withdraw from the study at any time and

without having to provide a reason for my withdrawal. I understand that I may ask for part or all of the information provided by me to be removed from the study at any time without penalty or explanation, up until publication of the final outputs. I understand that the information I provide for this research will be used for the following purposes: to produce reports, papers, presentations, and other government publications to inform future decisions and activities related to the Consumer Data Right, data sharing, and consent to inform data sharing standards and guidelines for consent I understand the information will be treated confidentially and I will not be identified in any publications resulting from the study. Information provided by me will be stored securely by the CSIRO. To participate in this research you must check the box stating that you understand this information and agree to participate in this research.

ANSWER CHOICES	RESPONSES	
I understand the above and agree to participant in this research.	100.00%	51
Total Respondents: 51		

Q2

Imagine you are considering sharing your personal banking data with an accounting service to help you with your taxes.
They give you a form asking for your consent to do so. What information do you feel is most important to know before sharing your data? Please rank in order of importance to you:

	1	2	3	TOTAL	SCORE
Who your information will be shared with	52.94% 27	35.29% 18	11.76% 6	51	2.41
How your information will be used	39.22% 20	49.02% 25	11.76% 6	51	2.27
How long the accounting service will have access to your information	7.84% 4	15.69% 8	76.47% 39	51	1.31

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Q3

If you gave an organisation access to your financial transactions, what do you think that organisation might be able to work out about you using only that information? Please check all that apply.

ANSWER CHOICES	RESPONSES	
Spending habits	90.20%	46
Income sources	84.31%	43
Where you shop	82.35%	42
Saving habits	80.39%	41
Name	70.59%	36
Your routines, including when you visit certain places	66.67%	34
Your frequent locations, including where you live and work	64.71%	33
Eating habits	60.78%	31
Gender	45.10%	23
Age	41.18%	21
Gambling habits	41.18%	21
Health issues	37.25%	19
Alcohol and drug use	35.29%	18
Your friends, family and partners	17.65%	9
Height	11.76%	6
Sexual preferences	9.80%	5
Total Respondents: 51		

Q4

Imagine you are applying for a credit card with 'Bank A' and you read the following phrase:

"Bank A may share your data with an outsourced provider"

Who do you think the outsourced provider may be? Please check all that apply.

ANSWER CHOICES ▼	RESPONSES ▼	
▼ Credit checking agency	74.51%	38
▼ Credit card organisation	60.78%	31
▼ Australian Tax Office	60.78%	31
▼ Marketing agency	33.33%	17
▼ Secure data storage service	31.37%	16
▼ Centrelink	31.37%	16
Total Respondents: 51		

Q5

Applying for a credit card with another bank, you read the following phrase:

"We will have one time access to your data."

What do you think "one time access" means?

ANSWER CHOICES ▼	RESPONSES ▼	
▼ Access to a single point in time snapshot of your data	43.14%	22
▼ Access to your data once, for as long as the bank wants	33.33%	17
▼ Access to your data for 24 hours	19.61%	10
▼ Access to your data at a specific time, once a day	3.92%	2
TOTAL		51

Q6

You're considering sharing your bank transaction history for a budgeting app. While signing up for the service, the provider states "We will store your data securely." How does this make you feel about the security of your data?

ANSWER CHOICES	RESPONSES	
▼ Curious	43.14%	22
▼ Confident	27.45%	14
▼ Worried	23.53%	12
▼ Confused	5.88%	3
TOTAL		51

Q7

Applying for a credit card with another bank, they ask permission to access your transaction history. How far back do you think this means?

ANSWER CHOICES	RESPONSES	
▼ My entire transaction history	35.29%	18
▼ The last year	27.45%	14
▼ The last 5 years	23.53%	12
▼ The last 2 years	13.73%	7
TOTAL		51

Q8

Imagine you have previously allowed an organisation to access your financial data, but you no longer want to use that service. You have the option to "revoke consent" to your data. What do you think "revoke consent" means?

ANSWER CHOICES	RESPONSES	
▼ The organisation is no longer allowed to access your data and has to delete any data about you they have stored	54.90%	28
▼ The organisation is no longer allowed to access your data but can keep the data about you they have already stored	23.53%	12
▼ The organisation is no longer allowed to access your data but has to anonymise the data about you they have stored	21.57%	11
TOTAL		51

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Q9

You've just found out that there was a breach at an organisation you shared your banking data with. You go to urgently cancel their access to your data. How would you do this? Order from most likely to least likely:

	1	2	3	4	5	TOTAL	SCORE
By phone	27.45% 14	37.25% 19	15.69% 8	17.65% 9	1.96% 1	51	3.71
In person	37.25% 19	17.65% 9	7.84% 4	17.65% 9	19.61% 10	51	3.35
In online banking	13.73% 7	23.53% 12	21.57% 11	25.49% 13	15.69% 8	51	2.94
By email	7.84% 4	11.76% 6	37.25% 19	9.80% 5	33.33% 17	51	2.51
In a phone app	13.73% 7	9.80% 5	17.65% 9	29.41% 15	29.41% 15	51	2.49

Q10

Imagine you are switching banks. To make the shift easier, you have to give your new bank permission to view who you currently have recurring payments with from your old bank. Which phrase best describes what will be shared?

ANSWER CHOICES ▼	RESPONSES ▼	
▼ List of organisations and people you make automated and scheduled payments to	50.98%	26
▼ Accounts you make automated and scheduled payments to	23.53%	12
▼ List of those you make automated and scheduled payments to	17.65%	9
▼ List of entities you make automated and scheduled payments to	7.84%	4
TOTAL		51

Q11

Who do you trust most with the security of your financial data? Please rank your answers in order of importance.

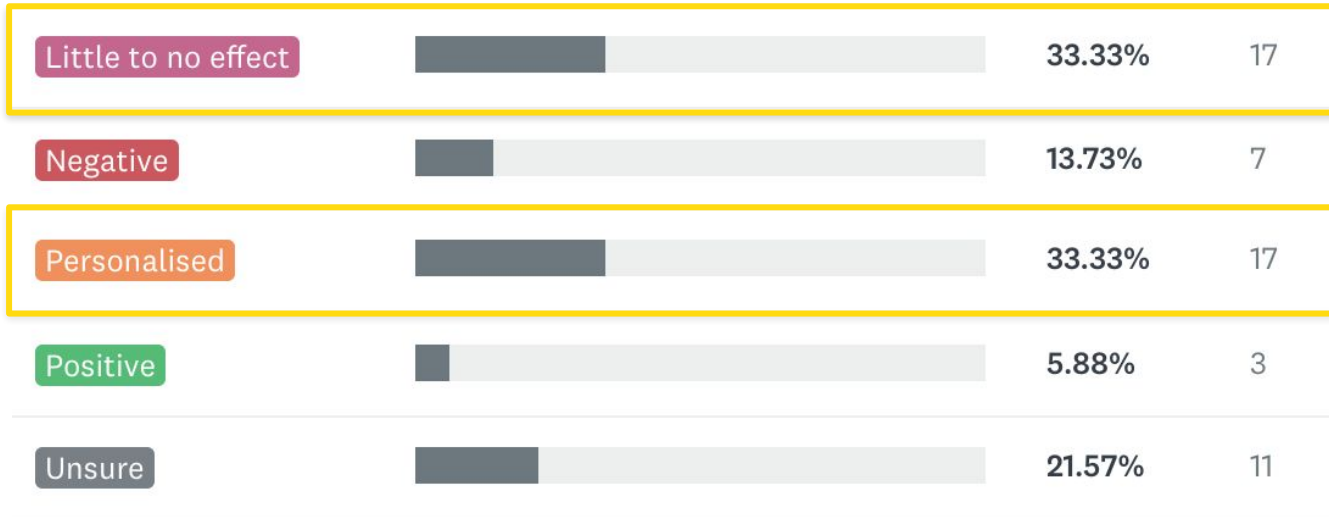|	1	2	3	4	5	6	7	8	9	TOTAL	SCORE
Australian banks	23.53% 12	31.37% 16	23.53% 12	1.96% 1	9.80% 5	3.92% 2	3.92% 2	0.00% 0	1.96% 1	51	7.18
Government agencies	25.49% 13	35.29% 18	15.69% 8	9.80% 5	0.00% 0	1.96% 1	3.92% 2	0.00% 0	7.84% 4	51	7.08
I don't trust any of these organisations with the security of my financial data (Rank first if applicable. Rank last if not applicable.)	39.22% 20	1.96% 1	3.92% 2	7.84% 4	3.92% 2	1.96% 1	7.84% 4	3.92% 2	29.41% 15	51	5.31
Insurance companies	1.96% 1	9.80% 5	23.53% 12	23.53% 12	9.80% 5	5.88% 3	7.84% 4	11.76% 6	5.88% 3	51	5.27
Non-government organisations (NGOs)	3.92% 2	3.92% 2	9.80% 5	13.73% 7	25.49% 13	17.65% 9	11.76% 6	5.88% 3	7.84% 4	51	4.71
Large technology companies (e.g. Google, Apple, Amazon)	0.00% 0	9.80% 5	7.84% 4	13.73% 7	17.65% 9	11.76% 6	19.61% 10	9.80% 5	9.80% 5	51	4.39
Not-for-profit organisations (NFPs)	3.92% 2	3.92% 2	3.92% 2	13.73% 7	15.69% 8	25.49% 13	7.84% 4	11.76% 6	13.73% 7	51	4.18
Fintech companies (e.g. Pocketbook, Xero, Raiz, MoneyBrilliant)	0.00% 0	1.96% 1	3.92% 2	11.76% 6	11.76% 6	11.76% 6	19.61% 10	29.41% 15	9.80% 5	51	3.47
Product comparison sites (e.g. Canstar, iSelect, Compare The Market)	1.96% 1	1.96% 1	7.84% 4	3.92% 2	5.88% 3	19.61% 10	17.65% 9	27.45% 14	13.73% 7	51	3.41

Imagine you're giving an organisation permission to view your financial transactions. One type of information shared will be about the people or organisations that you made payments to or received payments from. Which phrase best describes what will be shared?

ANSWER CHOICES	RESPONSES	
Information about who you've sent money to, and who you've received money from	39.22%	20
People or organisations that you made payments to or received payments from	23.53%	12
Information about payers and payees	17.65%	9
Details of those you have made transactions with	11.76%	6
Information about the entity that made or received the payment	7.84%	4
TOTAL		51

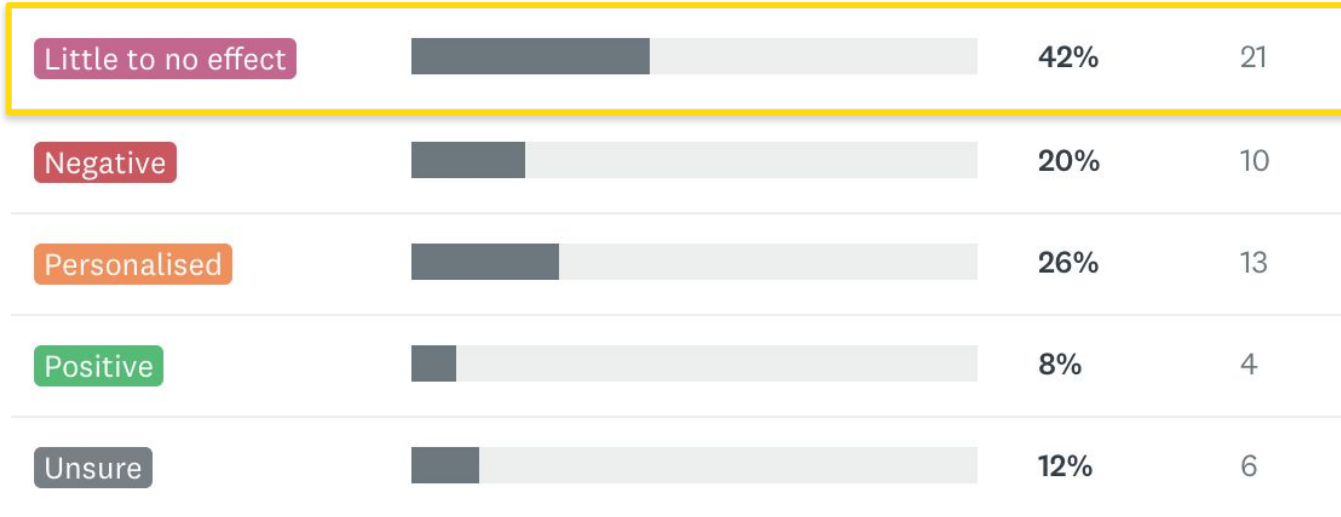How do you think sharing your banking data might affect:
The results you get on comparison sites

Little to no effect		33.33%	17
Negative		13.73%	7
Personalised		33.33%	17
Positive		5.88%	3
Unsure		21.57%	11

Note: These were free-text answers that were analysed and tagged for sentiment. The answers above reflect the tags assigned.

How do you think sharing your banking data might affect:
Your insurance policy

Little to no effect	42%	21
Negative	20%	10
Personalised	26%	13
Positive	8%	4
Unsure	12%	6

Note: These were free-text answers that were analysed and tagged for sentiment. The answers above reflect the tags assigned.

Q13c

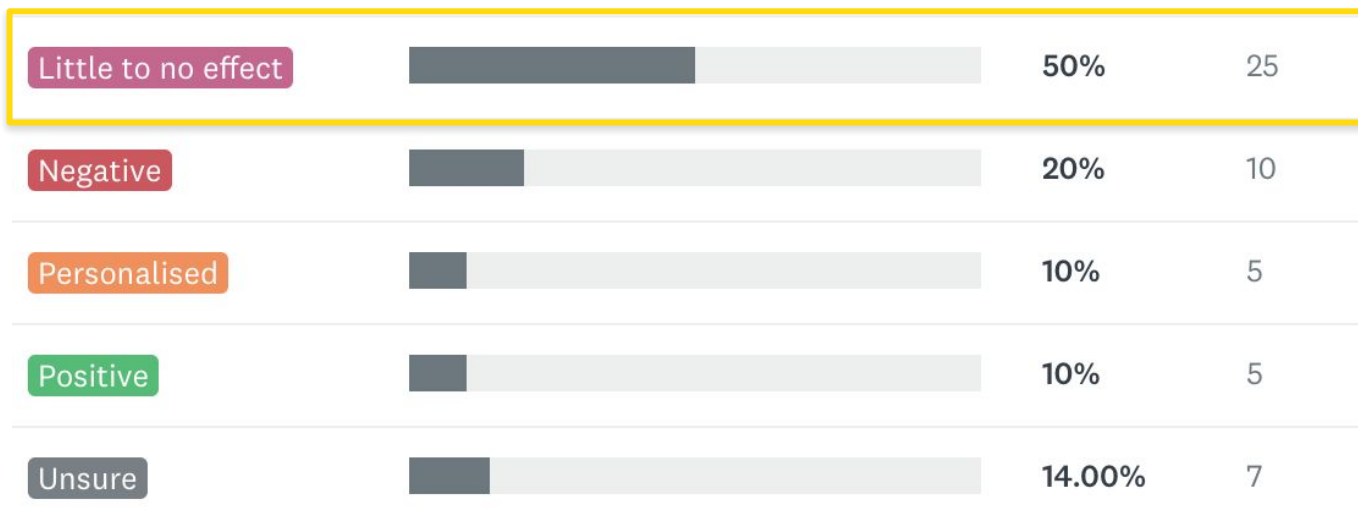How do you think sharing your banking data might affect:
The prices you get when you shop online

Little to no effect		**50%**	25
Negative		**20%**	10
Personalised		**10%**	5
Positive		**10%**	5
Unsure		**14.00%**	7

Note: These were free-text answers that were analysed and tagged for sentiment. The answers above reflect the tags assigned.

o13d

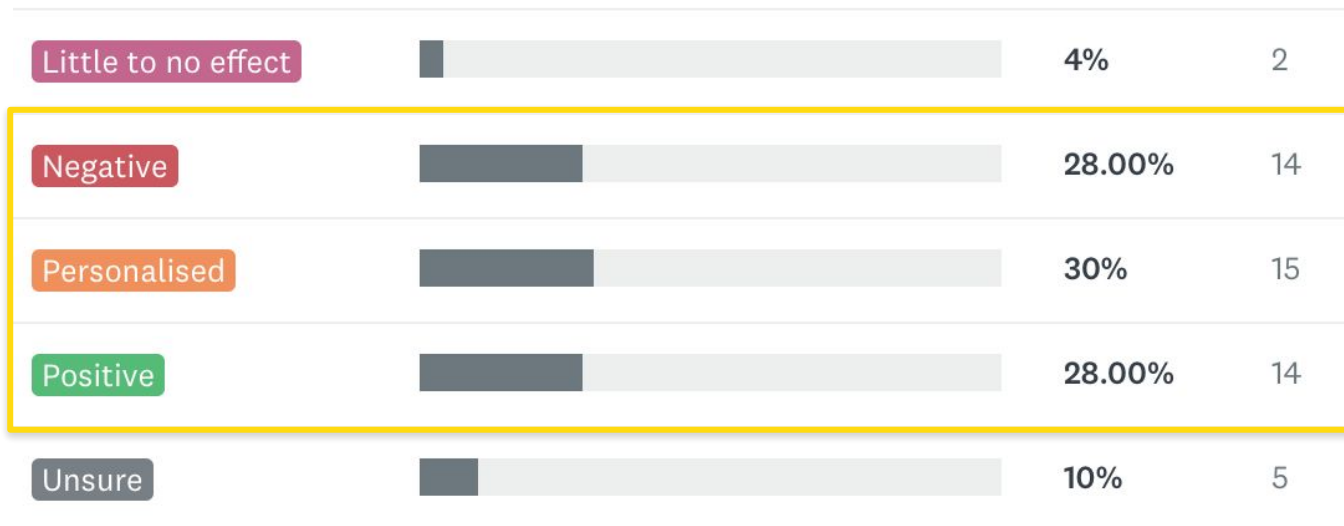How do you think sharing your banking data might affect:
The outcome of an application process for credit

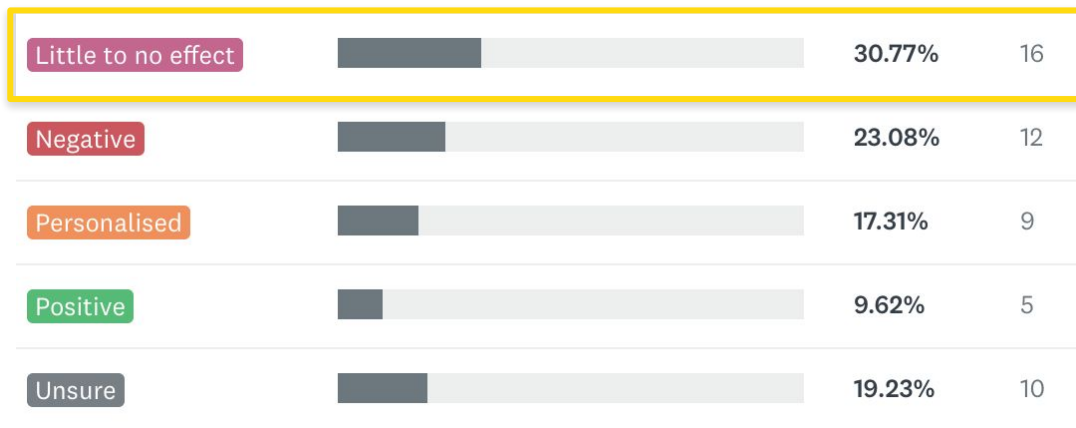|			
Little to no effect		4%	2
Negative		28.00%	14
Personalised		30%	15
Positive		28.00%	14
Unsure		10%	5

Note: These were free-text answers that were analysed and tagged for sentiment. The answers above reflect the tags assigned.

q13e

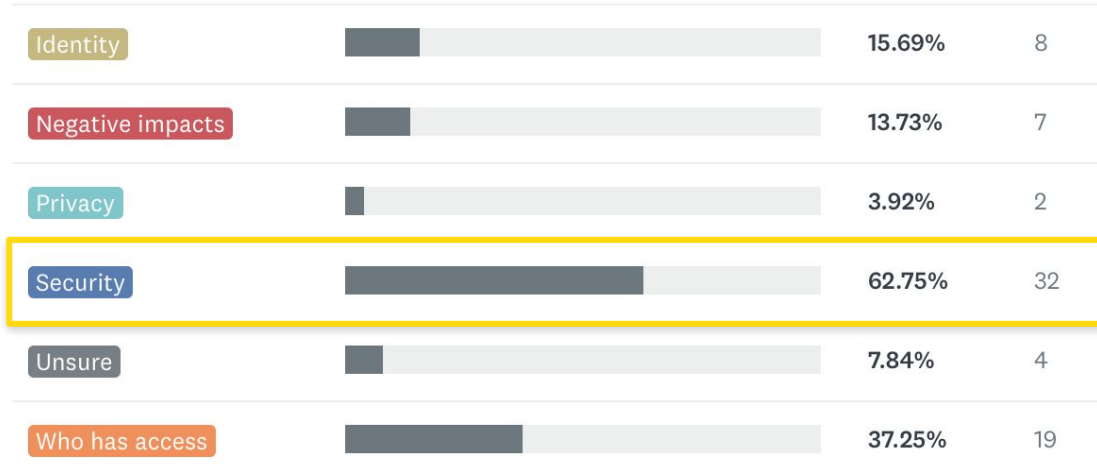How do you think sharing your banking data might affect:
The outcome of an application process for insurance

Little to no effect		**30.77%**	16
Negative		**23.08%**	12
Personalised		**17.31%**	9
Positive		**9.62%**	5
Unsure		**19.23%**	10

Note: These were free-text answers that were analysed and tagged for sentiment. The answers above reflect the tags assigned.

Q14

What are your most critical concerns regarding sharing your financial data?

Identity	**15.69%**	8
Negative impacts	**13.73%**	7
Privacy	**3.92%**	2
Security	**62.75%**	32
Unsure	**7.84%**	4
Who has access	**37.25%**	19

Note: These were free-text answers that were analysed and tagged for sentiment. The answers above reflect the tags assigned.

Q15

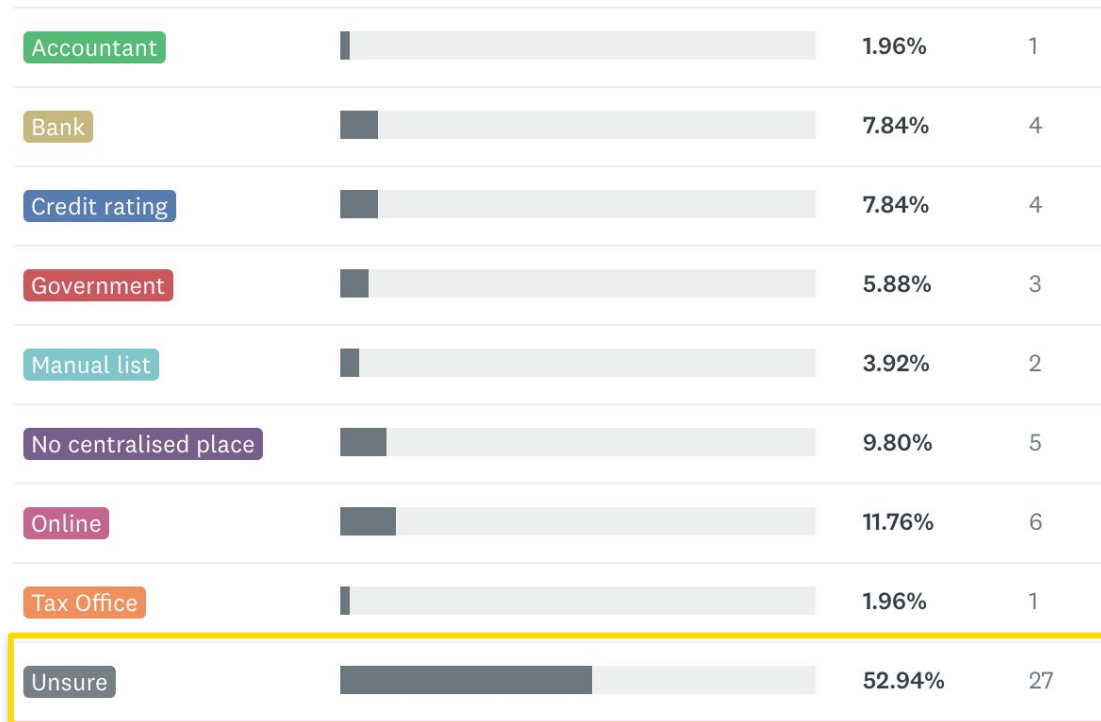Imagine you have shared your banking data with several organisations over time. Where would you expect to find a list of all the organisations you've shared your data with?

Category	%	Count
Accountant	1.96%	1
Bank	7.84%	4
Credit rating	7.84%	4
Government	5.88%	3
Manual list	3.92%	2
No centralised place	9.80%	5
Online	11.76%	6
Tax Office	1.96%	1
Unsure	52.94%	27

171

Q16

Would you share your personal banking data with companies outside of your bank?

ANSWER CHOICES	RESPONSES	
No	39.22%	20
Depends on why they'd need my data	39.22%	20
Depends on how sharing my data would benefit me	13.73%	7
Unsure	5.88%	3
Yes	1.96%	1
TOTAL		51