

**Input into the Treasury Laws Amendment (Consumer Data Right) Bill 2018**

Mr. Daniel McAuliffe

Structural Reform Group

The Treasury

Langton Crescent

PARKES ACT 2600

Email: data@treasury.gov.au

Secure Logic appreciates the opportunity to provide input into the *Treasury Laws Amendment (Consumer Data Right) Bill 2018*.

In general, Secure Logic views that the exposure draft legislation provides sound privacy protection of consumer data rights in support of the Open Banking initiative.

With regard to section *Subdivision D—Dealing with CDR data*, Secure Logic would like to recommend the inclusion of a granular, selective disclosure framework as a mandatory requirement for the consent interaction between CDR data owners and CDR data holders. There are numerous use cases where CDR data owners would only want to share a specific subset of information to a 3rd party CDR data holder, rather than a group of them as a whole.

As an illustration, a person might not wish to share all of his or her ‘personal details’ as a whole, if only the full name and address portions are required for the purpose of the interaction. In such cases, a framework to enable selective disclosure of personal information in a singular, atomic fashion is desirable and in the interest of the CDR data owners.

It is also recommended that the format of the consent artefact is obliged to contain a clear reiteration of the information being disclosed, the receiver(s) of the disclosure, the purpose of use and an expiry date of the consent among others. This aids in raising the awareness of the CDR data owners about the scope and extent of each disclosure.

In alignment with the recommended selective disclosure framework, it would be appropriate to present the consent information in a pairwise manner specifying each information field next to its corresponding extent of use, should a CDR data owner chooses to only share partially.

Secure Logic strongly supports Open Banking in Australia and believes that the legislation will put consumer’s data privacy in the forefront of this initiative, enabling a secure and rich ecosystem of future fintech innovation.

Kind Regards,

Santosh Devaraj

CEO of Secure Logic