

Hill, Christine

From: OBR
Subject: Submission: Open banking review [SEC=UNCLASSIFIED]

From: Mark Fitzgerald <mortgagedevelopment@bigpond.com<<mailto:mortgagedevelopment@bigpond.com>>>
Date: 26 September 2017 at 2:19:24 pm AEST
To: Scott Farrell <scott.farrell@au.kwm.com<<mailto:scott.farrell@au.kwm.com>>>
Subject: Re: Submission: Open banking review

Dear Mr Farrell,

Please see my email below, but now with your corrected address, for your consideration in the Open Banking Review.

I add to my submission as a customer that anyone given access by a bank to their customers' financial or other details, would need to legally comply with the same confirmed standard of cyber security as the providing bank.

I await your advice on how I can further assist your Review.

yours sincerely,

Mark Fitzgerald

On 19/09/2017 7:07 PM, Mark Fitzgerald wrote:

Mr S Farrell

Chair

Open Banking Review

Dear Mr Farrell,

I read in yesterday's Financial Review that you are interested in receiving submissions from the perspective of the bank customer.

My submission, as a bank customer, is that while my data is held within the bank it is secure, my privacy is assured, bank liability is clearly defined, and my funds are safe.

If a third party is given access to a customer's data, the third party would have to be required to give the same federally enforceable legal assurances to the customer as those given by the bank to the customer.

The first priority in federal legislation is to maintain the unique protection Australian bank customers enjoy, which is a cornerstone of the Australian economy, in its place in the world economy. This means maintenance of the same standard of bank legal probity between an Australian bank and its customers, regardless of the special pleadings of fintech start-ups looking for a cheap way into the Australian financial system.

From the customer's point of view, their first priority is financial data security. Open banking will suit those fintechs that seek to piggyback on the decades of confidence built up in the relationship between banks and their customers. Open data without strict, federally enforceable indemnities and bank-backed guarantees to banks and their customers, will weaken and not strengthen the Australian economy.

You have to ask yourself, 'would I give permission for my bank to pass on my bank financial data to an unknown third party to improve my banking experience and enhance competition?' The answer is of course "No". My first concern as a customer is to know that my money is safe, and my personal financial data is secure.

Third party access to my personal financial data jeopardises everything I have worked and saved for.

The review should conclude special pleadings by fintechs to have access to customers' financial data would weaken the extraordinary strength of the Australian banking sector and the Australian economy. The review should recommend that fintechs setting up in Australia meet the normal federal and state corporate requirements for all new businesses, and compete in the Australian marketplace on a level playing field.

Fintechs asking for special favours indicates a fundamental weakness in their business plan. The consequences of granting them special favours, not available to other Australian businesses, is further evidence of the importance of protecting bank customers, and denying fintechs access to bank customer data.

Please advise me what further steps I need to take to ensure my submission as a customer is fully considered and responded to.

Yours sincerely,

Mark Fitzgerald

bank customer