Hi Cristina

I'm sorry I didn't get a chance to put a submission regards to third-party intermediaries been accredited under the CDR data.

I'm happy to give you my thoughts or views on question 2 who needs to be accredited.

These are my personal views from a financial planning, insurance adviser, insurance broker.

I believe there are 3 levels of accreditation in the marketplace.

1. Software provider only

2. a provider with their own software or use a third-party software provider.(Can be white labelled)

3. A person or organisation that has access to the CDR data to provide goods or services.

I will give you my reasoning behind the 3 levels and why they should be treated differently for accreditation purposes.

I'm not sure how you going to charge for this accreditation, how you can manage and monitor this type of accreditation.

Software provider only
If organisational or company builds the technology and maintains it but not involved in providing goods or services to the consumer
then they should be treated differently in accreditation process and have set of rules specifically around the technology and its security, insurance and access rights and so forth.
End of the day they cannot be held responsible for the third-party that able to use the data or manipulated to their advantage to gain goods and services from the consumer right or wrong.

A provider with their own software or using the third-party software provider.
I believe this is the complicated level in the accreditation process and it is like wearing several hats at the same time because they can build technology to suit their criteria still meet all the rules
and may be advantage or disadvantage to the consumer depending what products and service that they are providing. I also see a lot of robot advice through this process or automation which can be good and bad. I'm happy to have a separate discussion about this as there are so many levels in this area itself.

A person or organisation that has access to the CDR data to provide goods or services.
This area is a very interesting one because there can be quite a few grey areas in regard to CDR

data been provided to intermediaries non-accredited person.

I personally believe that if you are a licensed person in the financial service industry which could mean you're an Authorised Representative of an organisation or you license in your own right that you should be exempt from accreditation. Another words you automatically covered because you need to comply with all those laws or rules you have set out.
Most financial advisers be in the mortgage broking, financial planning, insurance broking, stockbroking, insurance advising, etc have to meet all corporations act set out by a ASIC to deal with the consumer.

The person who should be accredited under this arrangement should be a personal or organisation that is not licensed under the financial service industry and has access to this data for purpose of goods and services which could include in-house people in large organisations as most of them don't have to be licensed or very limited authorisation and this is where the risk is.

This is only a suggestion that if the scenario is this that adviser that is licensed in the financial service industry has access to one of the above accredited processes be the software provider or organisation that provides the software then they would be exempt in the process. Advisers they could register using their licence number or registration number and this is all trackable or audited.

Other issue I see in all of this is that advisers could actually be having this data unknowing through multiple processes in systems and would not know that the origination of the data was the CDR Data.
Because when you put information into any system it is very difficult to remove having access or see the data is different to removing.

This is a very brief overview and they are my personal views.
I have read in great detail expose draft 29th of March 2019 CDR rules.

Happy to have further discussion on the matter.