

Thank you for the opportunity to provide feedback on the “CDR Rules expansion amendments - Consultation Paper”.

We are supportive of the changes to the accreditation process to include new restricted tiers of accreditation and the rules to allow consumers to consent to the disclosure of Consumer Data Right data to third parties. We also support the revisions that define the role of an Intermediary.

We have one area of the drafting that we believe requires clarification or amendment. In the section “1.10 Meaning of outsourced service provider and related terms”, Clause 1.10.2 (iv) of the Rules appears at odds to the balance of the document overall. In that section it states that “where the *provider* is to collect CDR data under the contract as mentioned in subparagraph (a)(i)— the provider must not further outsource that collection”.

If read in isolation, we believe the drafting (as presently constructed) would impact the interrelated drafting changes that enable a CAP arrangement and other facilitations relating to the provision of a service by a “Provider” to the “Principal”, where the Provider is an outsourced service provider of the Principal.

This is particularly relevant where “a further outsourcing” could be to an another company within the Group of the Provider (or indeed an external party) who could be an accredited party under the various tiers of accreditation.

We would appreciate you addressing this anomaly in your current review. In any event, we will contact your office directly to discuss.

Regards

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Cuscal

