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CDR Energy Consultation Hub  
Australian Competition and Consumer Commission  
23 Marcus Clarke  
Canberra ACT 2601

29<sup>th</sup> March 2019

Dear ACCC,

### **Consumer Data Right (Energy) - request for consultation**

We welcome the opportunity to contribute to this ACCC consultation process in relation to the CDR and Energy and more specifically around “Model 3” the economy-wide option - existing data holders (for example, retailers) would be responsible for providing CDR data directly to accredited data recipients and/or consumers i.e. the model used for the banking sector.

Over the past three years ID Exchange in partnership with digi.me have participated in several government and industry-initiated inquiries and forums relating to the use of data in conjunction with new technologies and the corresponding need for policy and law reform to support information innovation and competition.

These have included the Senate Inquiry on the National Innovation and Science Agenda, the Productivity Commission’s Review into Data Availability and Use and the Treasurer’s Open Banking Review and regarding the CDR.

ID Exchange/digi.me’s previous CDR submissions have been published by Treasury and are focused on providing an interoperable “economy-wide” personal data sharing approach via new and emerging digital platforms enabling multiple markets to move out of siloed and centralised data stores and therefore accelerate the ability for security focused decentralised, consumer centric plus privacy assured solutions.

### **About ID Exchange and digi.me**

ID Exchange is an Australian company that was established in 2012. We develop privacy enhancing technologies (PETs) and digital rights management solutions to assist consumers to protect and mobilise their data for their benefit. Our technologies provide consumers with the means to control and manage their data using methods such as unified Opt In<sup>®</sup> and Opt Out<sup>®</sup> product consent controls. Further information about ID Exchange can be found at <https://idexchange.me>.



In 2017 ID Exchange partnered with digi.me.

Digi.me is a UK-based enterprise. Since 2009 we have developed and deployed technologies that provide consumers with enhanced levels of control over their data that enable them to exercise their information privacy rights more effectively. Digi.me technologies are designed to promote the trusted handling of personal data – in a sector where trust has declined because of dubious data practices adopted within the tech industry in recent years.

Digi.me accomplishes this using a unique information architecture that relies on linkages and synchronous data handling. digi.me does not see, touch or hold data. This minimises security risk and provides consumers with choice about data storage and transfer options.

Our business model is commercially attractive. Transaction costs for businesses wishing to access data is priced universally at USD\$0.10c per source transaction, per user, per annum, with an annual maximum cap at USD\$3.00 per user, per annum.

Digi.me is ISO 27001 certified and compliant with all existing and forthcoming data privacy legislation, including the EU's *General Data Protection Regulation (GDPR)* and the *California Consumer Privacy Act 2018*.

Our collaboration with ID Exchange is an example of the type of new entrant into the market for personal data that the CDR is intended to promote. Further information about digi.me, including detail of the software and Apps we have successfully deployed, can be found at <https://digi.me>.

### **Submission summary**

To support the operationalising of the CDR in an economy wide approach as set out by the Farrell Report, our aim is to provide accredited and compliant data portability technology systems that will underpin the CDR and help the various market sectors effect data interoperability both within or across sectors and alignment to the policy and compliance objectives designed to address:

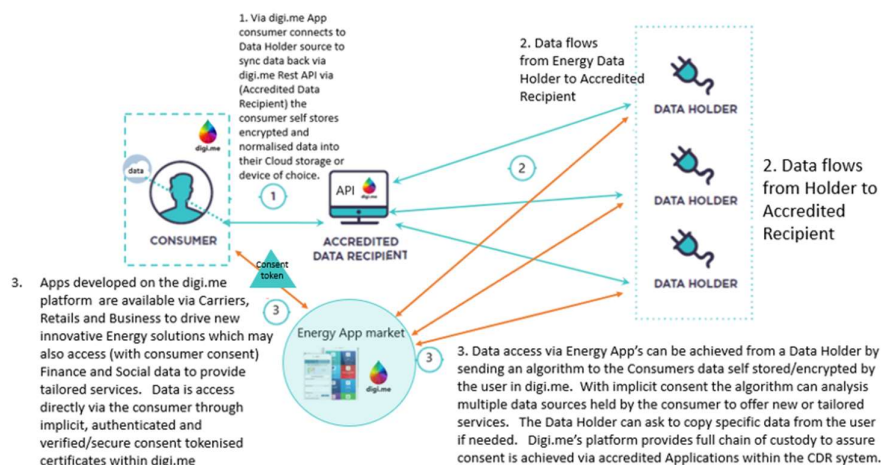
- promoting competition;
- promoting innovation;
- enabling the development of new businesses and business models;
- providing consumers with efficient and convenient access to their data; and
- ensuring that these rights are accompanied by strong privacy and security protections.

## Digi.me’s digital platform and benefits of the Model 3 approach

By utilising advanced enabling platforms such as digi.me we believe we can assist the Energy Sector to fast track the CDR objectives as stipulated in Model 3 to:

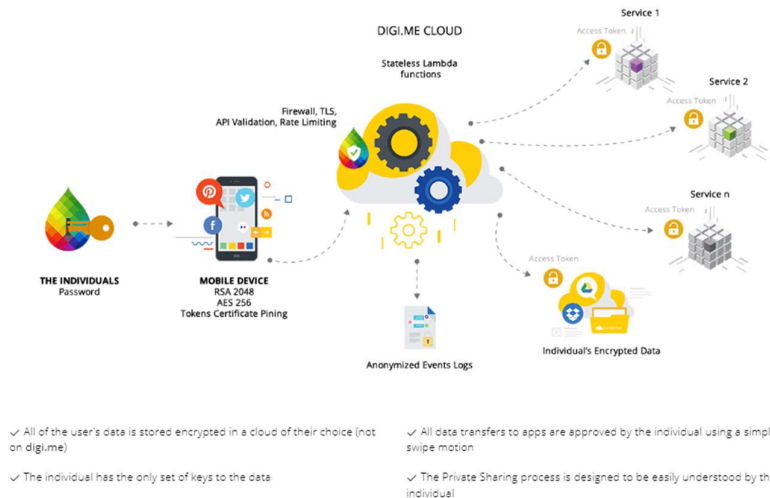
- Remove segment barriers to achieve interoperable personal data porting in a consumer centric App that automates synced data sources into a single ontology.
- Ensure to achieve a “whole of market” Energy approach is possible without whittling down the structures or narrowing data set or the approach to the point that the CDR provides no additional value to the market and is drawn back to today status quo due to the inability to embrace digital transformation.
- Introduce consumer centric – “Personal Information Management” platform that will enable the consumer to be a data recipient via accredited systems to ensure seamless, compliant, secure and (privacy by design) process which will mitigate various compliance risks and liability issues.
- Reduce complexity for AEMO to operate across multiple Energy channels and layers of regulatory complexity.
- Increase speed to market for Consumer facing Energy solutions.
- Provide a clear and timely approval mechanism to ensure that accreditation processes do not become mired in excessive regulatory burdens and extensive, costly delays.
- Develop an Energy API for direct data portability via accredited parties.
- Provide better (GDPR level) privacy protection, also incorporating right of erasure and time stamp data access rights within an ingrained consent management system with a framework which can facilitate a range of services via implicit consent certificates which are also compliant with the Open Banking and future Telco models.
- Ensure that security safeguards are proportionate and ‘fit for purpose’ having regard to the fact that security risk postures within the CDR ecosystem, applications and sectors.
- Secure Consent Management technology via SSL secure certificate tokens with the appropriate Authorisation and Authentication pathways for granular and specific use cases.
- Single data ontology automated via the digi.me platform which will normalise various Energy Data feeds to promote interoperability between the Data Holder and Consumer for simple use.

**Model 3 |** Demonstrated via use of digi.me consumer centric approach.  
The digi.me personal data sharing platform does not see, touch or hold data.



## User-centric architecture

Digi.me was designed from the ground up with user centrality



Digi.me's advanced architecture as per the diagram above offers resolution to many CDR elements including:

**Harmonisation** - of Energy data, by that a consumer may be utilising Gas and Electricity and via API's the user could sync data to provide a holistic profile on energy use.

**Ethics** – via the consent receipt process the use of consumer data can be clearly and transparently defined and data can be viewed (via consumer friendly visual UX) prior to sharing to ensure data is shared or gained via practices that are not asserted to cause harm,

**Open Data** – with data not limited to one carrier or silo new interoperable services can be achieved in a consented, secure and privacy-maintained manner.

**Paperless** – with new e-services Carriers can increase their green score.

**Pricing & Services** – can use Energy data in un-bundled forms and interwind other services from aligned sectors driving competition and tailored innovation solutions. Comparison sites are not therefore the only form of consumer services now available (which are often hard for consumers to understand "apples to apples" comparison due to bundling). With direct to consumer access to wider, richer, accurate and permissioned data sources include social, health and financial a range of new offerings can be considered stimulating innovation and new revenue opportunities.

**Switching** – Allows uniform data porting to be easier.

**Uptake** – If the CDR only provides limited consumer controls and narrow data access then the innovation will be along the lines of traditional energy services which are typically centred around price. When new App's that assist users to better understand energy use, management, security and interwoven IoT applications is provided then new consumer centric service and revenue streams can be achieved.

**Internet of Things** – is one of the most exciting avenues open to the Energy sector and will drive the breed of new applications for consumers. First mover applications will seek to:

- a. Drive efficiencies and behavioural change regarding energy use.
- b. Understanding energy use per device
- c. Align CPE/device usage with tariffs rates
- d. Allow multi zone billing
- e. Alerts and Security management
- f. Emergency Services – back to grid
- g. Provides consumers greater trust with controls and privacy assured
- h. Transparency of how data collected is used
- i. Consented data use for compliance and risk mitigation
- j. Foster new applications in the era of IoT and our connected economy

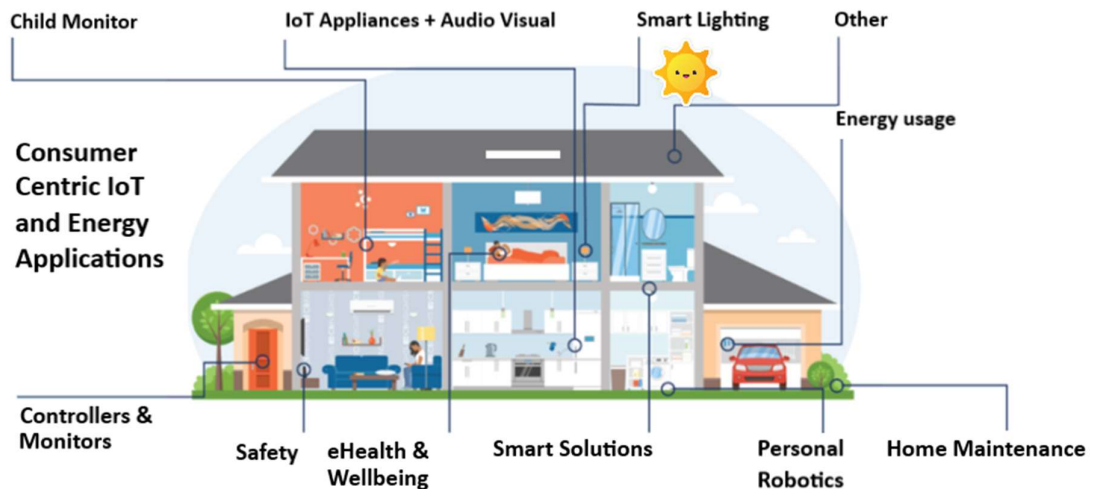


Image credit: shutterstock – Energy IoT

We believe it is a valid key point to note the CDR is designed to drive behavioural change and that;

- more comparison sites will not change the economics or user take up
- more mobility of data to comparison sites will not change behaviour
- need to create services and apps which have access to data where user can build trust that they are put first
  - <https://medium.com/@tonyfish/how-can-brands-restore-user-trust-752dd533daa8>

## Removing sectoral barriers

We advocate for data portability and a non sectoral approach for the pointing reasons;

- its competitive and innovation dividends will be realised sooner
- the likelihood that information incumbents delaying its implementation will be reduced
- sectoral application use will be transparent and accountable (mitigates risk and liability)



## Complexity

**Model 3** both removes complexity as data normalisation will allow various approved data streams to be consolidated in a single and graphical view for the consumer. This also applies to data synced from other sectors which allows consumer centric innovation to truly ignite. Apps can reach direct to consumer for richer, wider and accurate data often via algorithms, so the data does not leave the consumers control and privacy is assured. When interoperable data sources are applied with the consumer as the custodian of their self-stored (encrypted data) tailored services can be achieved.

Attached as Appendixes are diagrams that set out a simpler, more straightforward approach to implementing data portability and providing consumers access and consent controls to their data.

Overall, as technologist our intention is to provide platforms that will contribute to the CDR's success as part of a key opportunity for Regulatory reform that embodies consumer centric applications and economy wide (interoperable) digital transformation. Such approaches will enhance innovation and trusted data sharing within the core sectors of Australia's economy.

It is critical during a time whereas cyber security, privacy, data protection and trust needs to be fundamentally regained by the public to accelerate CDR participation, that as a foundation establishing comprehensive safeguards via enabling technologies is achieved. We ask for consideration that such platforms which meet accreditation standards to be given a fair go in order to support seamless implementation and drive open competition.

We welcome further contact for any further clarification, assistance or continued input about this submission.

Respectfully submitted.

Kind regards,

A handwritten signature in black ink, appearing to read 'Joanne Cooper'.

Joanne Cooper  
Founder, Managing Director  
ID Exchange Pty. Ltd.

In partnership with digi.me Ltd (UK)

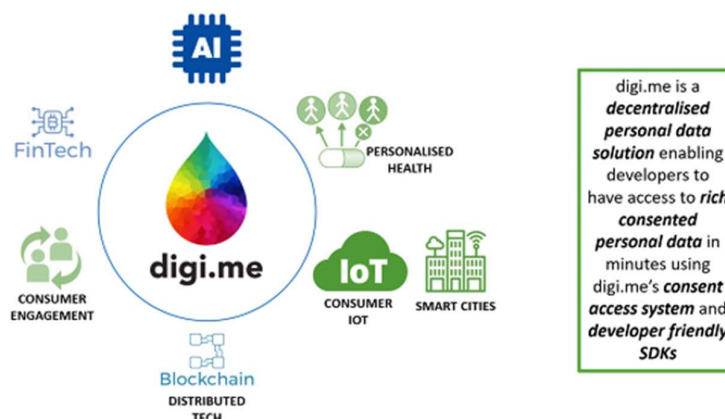
**Supporting diagrams detailing the digi.me personal data sharing and interoperability platforms in market now.**

Enabling an ecosystem win with the emergence of new decentralised consumer centric platforms such as digi.me to:

- Do more with data
- Privacy assurance drives trusted interactions
- Interoperability promotes new services
- Consumer agency of data provides self-governed insights
- Choice and value exchange promote economic stimulus
- Complex interwoven tech stack moves to pervasive delivery
- Big win for all as the model drives confidence for Government, Enterprise, SME and Consumer

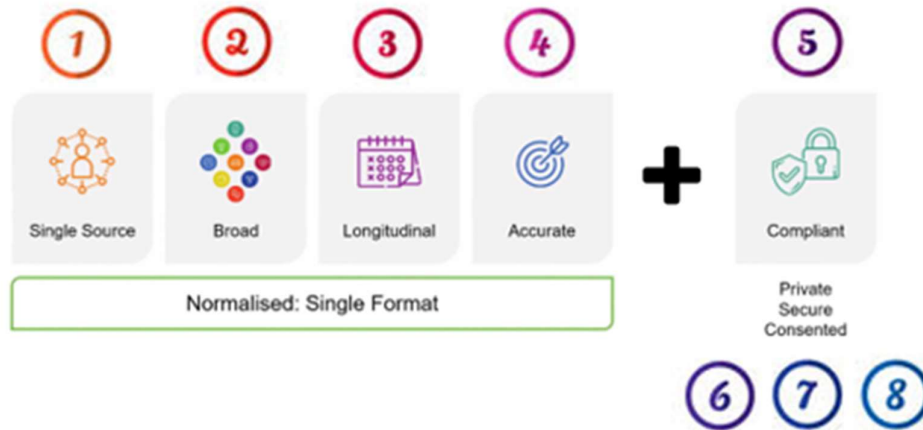


The Data Economy has a dependency on interoperate data to fully ignite, digi.me resolves this by allowing the consumer to be the control point with full Agency of self-stored data.

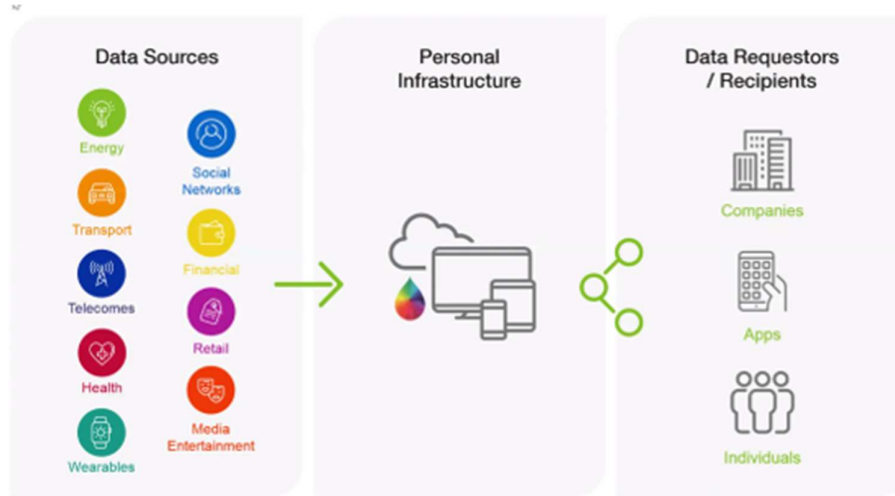




The eight elements required to achieve rich data interactions within the Data Economy:



How digi.me data sharing works:



[Samples of supporting reference material](#)

**Case study** | Cntrl Shift – techUK

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/755219/Data\\_Mobility\\_report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/755219/Data_Mobility_report.pdf)

**Video tutorials** | <https://digi.me/video>

**Most recent award** | <https://blog.digi.me/2018/11/21/digi-me-named-as-one-of-europes-top-100-digital-pioneers/>

**Australian Open Banking Hackathon** | <https://www.cso.com.au/article/648845/boutiq-scoops-top-prize-new-south-wales-spark-festival-digi-spark-hackathon/>

**Commitment to RegTech Innovation** | <https://www.technologydecisions.com.au/content/it-management/news/id-exchange-and-digi-me-open-innovation-hub-791851339>

**Government adoption** | <https://govinsider.asia/digital-gov/iceland-health-data-app-digi-me/>