



Softweb Development Pty Ltd
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3 July 2020

Australian Competition and Consumer Commission
CDR Rules team

To whom it may concern,

**Re: Competition and Consumer (Consumer Data Right) 2020 - Consultation
Draft Rules Feedback**

Softweb has a product available in the Australian market that allows Australian consumers to automatically sync their bank transactions to a popular American personal finance app.

Launched in 2019, it has proved popular among Australian consumers. The product leverages existing Australian financial data aggregators to sync transactions from the majority of Australian banks and credit cards.

Under the proposed rules, recipients of CDR data are required to be accredited. In our use case this would require an American company to undertake the time consuming and costly accreditation process, even though the Australian market is just a small fraction of their customer base.

The CDR website (<https://www.cdr.gov.au/>) states that the CDR offers consumers Choice and Convenience. We are concerned that the proposed amendments to the CDR rules fall short of achieving these goals.

The accreditation process is out of reach for many small Australian businesses due to the time consuming, complex and costly obligations imposed by the CDR rules.

The proposed rules will in practice act as a barrier preventing some smaller Australian companies, and also some foreign owned companies from participating. In both cases Australian consumers will lose the choice and convenience of their data being made available via the CDR to some of their favourite products. The unintended outcome of this situation is that access to consumer data will continue via the existing channels that are less secure and convenient for consumers.

I urge the ACCC and Treasury to consider an approach similar to that used in the United Kingdom where it is possible to become an agent of a fully accredited data recipient. This allows many of the obligations of the CDR rules to be met by an

accredited intermediary on behalf of an unaccredited agent, levelling the playing field for small businesses, and realising better outcomes for consumers.

Please feel free to contact me in case you would like to discuss this further.

Sincerely,

Alan Heywood
Director

Softweb Development Pty Ltd

