



**BIZA·IO**

**DP 334: Data Holder Dashboards**  
**Proposal Response**

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## Data Holder Dashboards

### Amending authorisation details

Biza welcomes and supports this proposed standard change. It makes sense to explicitly define this around the technical definition of an amendment that the Data Holder (DH) can lean on.

### Accredited Person Consent Dashboards

We note that the Rules amendment related to this proposal is the same as that prescribed for the Accredited Person Dashboard since *Competition and Consumer (Consumer Data Right) Amendment Rules (No. 3) 2020* commenced in 22 December 2020, specifically:

1.14 (3) (i): *details* of each amendment (if any) that has been made to the consent.

As of now, we have not seen a proposal related to making a Standard relating to Accredited Person Dashboards. We also note that initial testing of Data Recipient implementations with regards to this Rule reveals a reasonable level of non-compliance and disparity in presentation. We are unclear why or how the DSB is of the opinion it is appropriate to prescribe a Standard for Holders but has not applied the same prescription to Recipients despite a Rule, with the same wording, being in effect for almost 3 years. Alignment with existing approach from the DSB would be instead introduce a CX Guidelines for Holder implementations with respect to this Rule.

Our view is that a Consumer has a reasonable expectation that the view of the Dashboards on both sides should be consistent and if prescription is to be given in Standards for Holders that it would in fact be *inappropriate* not to also prescribe similar such Standards for the Accredited Person Dashboard.

On this basis we would suggest, in addition to Standards being defined for the Data Holder Dashboard that Standards is also made to the Accredited Person Dashboard that either:

- a. Only showing amendments to collection consents as is clearly defined from a technical standard and is the analogue to the holder amendment *or*;
- b. Shows all amendments, regardless of type of consent. This would include, among others:
  - Added/Removing a consent to Direct Marketing
  - Extending the period of a Use Consent
  - Extending the period of a Disclosure Consent
  - Altering the Redundant Data Handling option between Deletion and De-identification
  - (For DP-333) Removing or Adding a Business Consumer Statement if an error was made when setting up the original arrangement.

From a Rules perspective (b) appears to be the most aligned but, at a minimum, the Standards should at least prescribe (a) to ensure that the Consumer experience aligns in both Data Holder and Accredited Person dashboard experiences.



## Data Holder Dashboard: Data Recipient Handling Details

Biza supports this change in copy as it is very similar to the copy that is expected in the Data Holder dashboard upon arrangement revocation.

We note that it would be very helpful if the Register captured the Consumer Dashboard URL, side by side with the CDR Policy, of each Recipient and Data Holder brand so they could be published to a location a Consumer can centrally locate, for instance [cdr.gov.au](http://cdr.gov.au).



## Implementation Considerations

The main implementation consideration is with respect to CX Guidance that clearly aligns the current CX Standards and Guidance for amendment consent flows to the expected dashboard amendment log presentation. By providing such guidelines, this will ensure future alignment as the claims in the authorisations change over time.

With the current Data Holder authorisation metadata, Biza feels that dashboard amendment log would at a minimum include:

1. Authorised Data Clusters
2. Authorised Accounts
3. How long the sharing was authorised for and, potentially the new expiration date
4. In the Non-Individual Consumer case, the Nominated Representative that authorised the amendment with consideration given the amendment *may not* have been conducted by the original Nominated Representative.



## About Biza.io

Biza.io (Biza) are the market leaders in Data Holder solutions to the Consumer Data Right and are the only pure-play CDR vendor in Australia providing these solutions. Biza.io has been involved in the Data Standards setting process since the very beginning and its personnel remain the largest non-government contributors to consultations. In addition to its participation within the CDR, Biza.io is also a contributing member of the Financial-grade API (FAPI) Working Group, contributors to the FAPI 1.0 information security profile and co-authors of the Grant Management for OAuth 2.0 specification.

## About Our Customers

By November 2023, Biza will be responsible for providing the Data Holder infrastructure for more than 50% of the mandated Energy Retailers as recently published by the ACCC<sup>1</sup> accounting for more than 75% of the entire Australian Consumer market within the Energy sector. In addition, Biza delivers the Data Holder obligations for approximately 20% of the Data Holders within the Banking sector.

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<sup>1</sup> <https://cdr-support.zendesk.com/hc/en-us/articles/7975868764431-Energy-Data-Holders-with-Consumer-Data-Sharing-Obligations-Commencing-1-November>

