

CBA response to April 2020 CX Consultation Draft 6 – CDR Logos

| Document Reference | Proposal | Feedback |
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| Pg 3 | The changing of existing items on CDR Logos from CX Guidelines (a SHOULD) to CX Standards (a MUST) | CBA do not support a blanket change of all ‘Should’ to ‘Must’ – please see more granular feedback below. |
| Pg 3 | Where else in the Consent Model and CDR ecosystem the CDR logo could be applied | The logo could be included across a number of experiences in the CDR ecosystem, including the authorisation flow, dashboards, notifications, public facing websites, proactive PR campaigns etc. This use should be at the discretion of the ADR/DH and should be amended to ‘May’. |
| Pg 3 | Whether such inclusions should be classed as guidelines or standards ; and | CBA recommend some of the proposed use of the CDR logo are classified as not mandatory; therefore these should be considered Guidelines as opposed to Standards. |
| Pg 3 | The time required for successful implementation of the options in this paper, and any other options raised for consideration | Delivery relies on timely supply of the CDR logo and guidelines/specifications by the ACCC. We note the ACCC and Treasury have consulted with industry on the impacts of the COVID-19 pandemic, and are expected to make an announcement shortly regarding timelines for MRO and Stage 2 of Open Banking. |
| Pg 5 | <ol style="list-style-type: none"> 1. ADRs MUST use the CDR Logo provided by the ACCC to facilitate consistency, familiarity, and trust in the CDR ecosystem. 2. ADRs MUST use the CDR Logo in the course of requesting consumer consent to collect and use CDR data. This MAY include the steps immediately preceding a request to collect and use CDR data, such as the ‘pre-consent’ stage. 3. ADRs MUST use the CDR Logo on consumer dashboards and this MUST be in association with CDR consents. 4. ADRs MUST use the CDR Logo on CDR Receipts and Consent Model related notifications, such as 90 day notifications and re-consent/authorisation requests (if provided for in the future). 5. ADRs MUST use the CDR Logo in their CDR policy. 6. ADRs SHOULD use the CDR Logo, where appropriate, for other CDR-related communications and interactions. 7. The exact locations of CDR Logos in the Consent Model are at the discretion of the ADR but any use MUST be in direct relation to CDR and MUST NOT be used in relation to non-CDR data sharing. | <ol style="list-style-type: none"> 1. CBA supports 2. CBA supports 3. CBA supports 4. CBA suggest this be amended to ‘should’ - technical limitations for some of our messaging/notification platforms mean including images is not always possible. 5. CBA disagree – This is an internal policy so should have ADR branding and be at the discretion of the ADR to include CDR logo. CBA recommend changing to ‘May’. 6. CBA supports providing this remains a ‘Should’ 7. CBA supports |

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| Pg 6 | <ol style="list-style-type: none"> 1. DHs MUST use the CDR Logo provided by the ACCC to facilitate consistency, familiarity, and trust in the CDR ecosystem. 2. DHs MUST use the CDR Logo in the course of authenticating the consumer associated with the data request. 3. Where appropriate and practical, DHs MUST use the CDR Logo in conjunction with any One Time Password delivery communications. 4. DHs MUST use the CDR Logo throughout the authorisation flow in relation to the ADR requesting data. Use of the CDR Logo elsewhere in the authorisation flow is at the discretion of the DH. 5. DHs MUST use the CDR Logo on consumer dashboards and joint account management services and this MUST be in association with CDR authorisations. 6. DHs MUST use the CDR Logo on Consent Model related notifications, such those relating to joint account election for both joint account holders. 7. DHs MUST use the CDR Logo in their CDR policy. 8. DHs SHOULD use the CDR Logo, where appropriate, for other CDR-related communications and notifications. 9. The exact locations of CDR Logos in the Consent Model are at the discretion of the DH but any use MUST be in direct relation to CDR and MUST NOT be used in relation to non-CDR data sharing. | <ol style="list-style-type: none"> 1. CBA supports 2. CBA suggest changing to 'May' as the authentication experience is focussed on the customer identifying themselves. The CDR should then be introduced once identified and in context to the authorisation request. 3. CBA suggest this is amended to 'should' - technical limitations for some messaging/notification platforms mean including images is not always possible. 4. CBA supports 5. CBA recommend changing to 'Should' with regards to the Joint Account Management Service. 6. CBA does not support – technical & design limitations associated with the notification capabilities of systems or platforms mean artwork cannot always be included. Recommend changing to a 'should'. 7. CBA disagree – This is an internal policy so should have DH branding and be at the discretion of the DH to include CDR logo. We recommend changing to a 'May'. 8. Agree – assuming this stays as a 'should' 9. CBA supports |
| N/A | Other clarifications sought | <p>Per our above comments, CBA request the supply of the CDR logo in a timely manner by May 2020. We understand the logo is currently undergoing copyright assessment, but this should not prohibit the supply of image files so that build can commence.</p> <p>CBA also request the logo files are supplied with clear brand specifications which outline usage of the logo – this should include sizing, format, use of the logo on desktop and mobile formats. For accessibility via screen-reader, we will also require a description/label for the logo. Clear specifications will ensure ease of implementation and consistency across the ecosystem.</p> |