

Discussion Questions - Response Form



Chapter 1

Q1: What role do you believe financial policymakers should play in the discussion on enhancing data mobility, both for financial and non-financial data? Handelsnamen

Chapter 2

Q2: What are the most significant potential benefits of broadening data sharing for financial services? The ability to share what data types would be most beneficial?

Q3: Do you believe the ability for cross-sectoral sharing of data affects the potential benefits?

Q4: How significant do you believe privacy and information externalities of data sharing are?

Q5: How do you assess the impact of data sharing on financial inclusion?

Q6: To what extent do you believe data sharing can help mitigate market concentration?

Q7: Which externalities related to data sharing do you believe to be most important?

Chapter 3

Q8: Should other important market developments around data sharing be considered?

Q9: What policy developments are of particular importance to financial regulators and supervisors?

Chapter 4

Q10: What are your views on the policy vision and policy objectives as outlined?

Chapter 5

Q11: Should Open Finance be subject to statutory regulation and public supervision?

Q12: How can strong customer authentication be maintained in a way that ensures acceptable user experience? What, if any, role do you see for eIDs?

Q13: Do you believe compensation for use of data-sharing infrastructure should be permitted as part of the OFR? If so, how should fee levels be determined?

Q14: How can data ethics be incorporated as part of Open Finance?

Q15: Should scope of Open Finance be broad or focused on specific use cases?

Q16: How should implementation (priorities, sequencing) be organized?

Q17: How do you see the role of financial entities in data intermediation evolve?

Q18: What should the relationship be between the Open Finance Regulation and the expected amendments for PSD2 ("PSD3")?

Q19: Should access to financial data be subject to reciprocity? If so, in what way?

Q20: What components of data sharing should be standardized through a framework?

Q21: Should OFR aim for a single EU-level financial-data sharing framework (e.g. SPAA) to underpin Open Finance? Or should it leave room for multiple (e.g. national-level) schemes?

Chapter 6

Q22: What, in your view, would be the added value of discussed novel techniques?

Q23: What is your view on the need and design of reasonable data use requirements?

Q24: Is a horizontal data-sharing right a feasible and desirable alternative to sectoral rights?

Q25: Do you believe a horizontal data-sharing framework is desirable and feasible?

Q26: How should the development of and compliance with a horizontal framework be organized?

Chapter 7

Q27: What, if any, data should financial supervisors and central banks consider providing?

General

Q28: Do you have any other points or comments regarding the content of the discussion paper?
