

<b>Which options outlined in this paper do you support?</b>	
Insight Descriptions	<p><b>Option 1: Insight Example</b> CBA understands the intent and utility of this option, but ideally the exact information that will be disclosed should be revealed to the customer as plainly as possible and shouldn't be embellished or confused with the use of examples. This could also add to cognitive overload for customers if the other options in this DP were also included, as the amount that needs to be disclosed to a customer is already very long.</p> <p>Otherwise the DSB should consider downgrading this Option to a SHOULD condition</p> <p><b>Option 2: Time of Insight Generation</b> CBA supports this option being included</p> <p><b>Option 3: Purpose of Insight</b> CBA supports this option, but recommends that it is MUST condition, to ensure consumers are provided with the appropriate level of transparency.</p> <p><b>Option 4: Insight Readability</b> CBA supports the intent of this option but recommends consideration of this being a SHOULD condition.</p> <p>CBA suggests considering the potential implications of implementing a hard requirement for ADR's to align to a readability formula. The unintended consequences may be that the consequences of a consumer providing consent are overly simplified, and/or reliance on many sentences with shorter words to meet requirements without improving readability.</p> <p><b>Option 5: Actual Insights</b> CBA supports this option being included</p>
Disclosure Notifications	<p><b>Option 1: CDR Protections</b> CBA supports this option being included</p> <p><b>Option 2: Non-AP Handling</b> CBA supports this option being included, but believes that it should be extended to ensure that a Non-Accredited Person has consumer facing information regarding how data will be handled, to avoid telling customers to review something that doesn't exist. CBA also notes that the option may not be required if Option 5 is upgraded to a MUST condition.</p> <p><b>Option 3: Non-AP- Known Regulations</b> CBA is supportive of this option and recommends that it is included together with Option 4 to ensure consumers have a complete view of known and unknown regulations/protections relevant to a non-AP</p> <p><b>Option 4: Non-AP- Unknown Regulation</b> As above, CBA supports this option being included, noting that Option 3 and 4 are not mutually exclusive of one another.</p> <p><b>Option 5: Non-AP Data Handling Summary</b> CBA recommends the DSB considers upgrading this option to a MUST or SHOULD condition, particularly in the scenario where a non-AP may not have a written policy to inform customers about how their data will be handled.</p> <p><b>Option 6: Complaint Handling</b></p>

	<p>CBA supports this option being included</p> <p><b>Option 7: Record Access</b> CBA supports this option being included</p> <p><b>Option 8: Notification Record</b> CBA supports this option being included</p>
<p><b>What alternative requirements should be considered for insight descriptions and disclosure notifications?</b></p>	
<p>CBA recommends that CX Standards for Trusted Advisor disclosure consents explicitly advise consumers that they will not have the same rights or protections as consumers who share their CDR data with unrestricted ADRs.</p>	