

- S** 11.11 During the contract term, a FSP shall notify the affected financial consumers of important disclosure on its website or other digital channels in a timely manner using instant communication modes such as SMS or push notification, with details on how to access the disclosure. Notwithstanding, the FSP shall not use hyperlinks in a SMS to direct financial consumers to the disclosure on its website or other digital channels to prevent the risk of financial scams.
- S** 11.12 When designing financial product disclosure materials for digital channels, a FSP shall pay particular attention to the font size, colour and graphics used to disclose key product information. This is to ensure that these elements enhance the readability and prominence of the product information in relation to other contents displayed on the screen. A FSP must ensure that the disclosure does not include features that draw financial consumers' attention away from the key product information.
- G** 11.13 The use of more interactive and engaging methods to improve how key product information is presented would entice financial consumers to read and understand such information. A FSP is encouraged to-
- a) add a "reading time" cue (e.g. it takes less than five minutes to read the PDS);
 - b) use interactive tools to help financial consumers understand complex information; and
 - c) incorporate digital tools such as a loan or financial calculator.
- G** 11.14 Good practices to enhance readership and improve understanding include incorporating video or audio to explain complex information, FAQs, warnings on major product risks or short quizzes to assist financial consumers in understanding key terms.
- S** 11.15 A FSP shall ensure that financial consumers are adequately assisted in their interactions with the FSP in the digital environment by making available a hotline, live chat, chatbot or other interactive tools, proportionate to the complexity of the financial product offered.
- G** 11.16 For avoidance of doubt, the interactive tools specified under paragraph 11.15 are not necessary if a FSP distributes only simple products, such as deposit accounts, through its digital channel.
- S** 11.17 For financial products that are offered via a digital channel, a FSP shall clearly inform financial consumers at the point of entering into a contract that they will only receive product disclosure in a digital form⁹ if the FSP does not intend to provide physical copy of the product disclosure.
- S** 11.18 In relation to financial products offered through non-digital channels, a FSP must consider the profile of affected financial consumers prior to implementing disclosure through only digital mean¹⁰. The FSP shall notify financial consumers

⁹ For the avoidance of doubt, for financial products offered via a digital channel, a FSP is not required to provide a physical copy of the product disclosure.

¹⁰ Paragraph 11.18 is applicable when a FSP decides to change the way in which disclosure is communicated to existing customers, i.e. from physical copy to disclosure via digital means only. For example, the FSP will only send soft copy of account statements to the customers.