

contractual disclosure or impede meaningful consideration of product information in their decision-making. The absence of human interaction in the decision-making process heightens the likelihood of financial consumers purchasing a financial product without fully understanding the risks and obligations associated with the product. It is therefore crucial for FSPs to promote effective consumer engagement by enhancing the presentation of product disclosure provided in a digital environment.

- S** 11.2 With the growing use of digital channels to offer financial products, a FSP shall ensure that product disclosure is compatible with the digital channel used, whilst ensuring compliance with other disclosure requirements in this Policy Document, particularly the requirements specified under paragraphs 9 and 10.
- S** 11.3 A FSP shall ensure that product information disclosed to financial consumers through digital channels is easily accessible, clear and conspicuous to promote consumer engagement and understanding of key product information to facilitate informed decision-making by financial consumers.
- G** 11.4 A FSP is encouraged to conduct consumer testing to solicit feedback from financial consumers to ensure product disclosure via digital channels are engaging and easily understood by financial consumers.
- S** 11.5 A FSP shall disclose financial product information in a manner that enables financial consumers to print or save a copy of the product information for future reference.
- G** 11.6 A good practice for implementation of paragraph 11.5 is to prominently display the download button to draw financial consumers' attention on the available option to save a digital copy.
- S** 11.7 A FSP shall display the PDS prominently on the digital channel to draw financial consumers' attention to the information. A FSP must not include any promotional information within the same page to avoid diverting financial consumers' attention away from the PDS.
- S** 11.8 A FSP shall ensure that financial consumers cannot proceed to the next stage of the contractual process unless they confirm that they have read the entire PDS. When scrolling is necessary, the FSP shall use appropriate techniques to encourage financial consumers to scroll to view the disclosure.
- G** 11.9 Good practices for implementing paragraph 11.8 include using clearly displayed text prompts or visual cues at different parts of the page to convey the importance of reading the PDS and to encourage financial consumers to scroll further to read the PDS.
- S** 11.10 A FSP shall ensure that financial product information provided on its digital channels is accurate and up-to-date at the point of disclosure so that financial consumers are able to use such information for making informed decisions.