



BANKING AND FINANCE

Public consultation on FinTech: a more competitive and innovative European financial sector


Fields marked with * are mandatory.

Introduction

Thank you for taking the time to respond to this consultation on technology-enabled innovation in financial services (FinTech). Our goal is to create an enabling environment where innovative financial service solutions take off at a brisk pace all over the EU, while ensuring financial stability, financial integrity and safety for consumers, firms and investors alike.

Please note: In order to ensure a fair and transparent consultation process **only responses received through our online questionnaire will be taken into account** and included in the report summarising the responses. Should you have a problem completing this questionnaire or if you require particular assistance, please contact fisma-fintech@ec.europa.eu.

More information:

- [on this consultation](#)
- [on the protection of personal data regime for this consultation](#) 

1. Information about you

*Are you replying as:

- ☐ a private individual
- ☐ an organisation or a company
- ☒ a public authority or an international organisation

*Name of the public authority:

Actuarial Association of Europe

Contact email address:

The information you provide here is for administrative purposes only and will not be published

moniques@actuary.eu

*Type of public authority

- ☒ International or European organisation
- ☐ Regional or local authority
- ☐ Government or Ministry
- ☐ Regulatory authority, Supervisory authority or Central bank
- ☐ Other public authority

*Where are you based and/or where do you carry out your activity?

Belgium

*Field of activity or sector (*if applicable*):

at least 1 choice(s)

- ☐ Accounting
- ☐ Asset management
- ☐ Auditing
- ☐ Banking
- ☐ Brokerage
- ☐ Credit rating agency
- ☐ Crowdfunding
- ☐ Financial market infrastructure (e.g. CCP, CSD, stock exchange)
- ☒ Insurance
- ☐ Investment advice
- ☐ Payment service
- ☒ Pension provision
- ☐ Regulator
- ☐ Social entrepreneurship
- ☐ Social media
- ☐ Supervisor
- ☐ Technology provider
- ☐ Trading platform
- ☐ Other
- ☐ Not applicable



Important notice on the publication of responses

*Contributions received are intended for publication on the Commission's website. Do you agree to your contribution being published?

([see specific privacy statement](#) )

- ☒ Yes, I agree to my response being published under the name I indicate (*name of your organisation /company/public authority or your name if your reply as an individual*)
- ☐ No, I do not want my response to be published

2. Your opinion

1. Fostering access to financial services for consumers and businesses


FinTech can be an important driver to expand access to financial services for consumers, investors and companies, bringing greater choice and more user-friendly services, often at lower prices. Current limitations in traditional financial service markets (e.g. opacity, lack of use of big data, insufficient competition), such as financial advice, consumer credit or insurance, may foreclose access to some categories of individuals and firms. New financial technologies can thus help individuals as well as small and medium-sized enterprises (SMEs), including start-up and scale-up companies, to access alternative funding sources for supporting their cash flow and risk capital needs.

At the same time, potential redundancy of specific back-office functions or even of entire market players due to automation via FinTech solutions might have adverse implications in terms of employment in the financial industry, even though new jobs would also be created as part of the FinTech solutions. The latter, however, might require a different skill mix.

Question 1.1: What type of FinTech applications do you use, how often and why? In which area of financial services would you like to see more FinTech solutions and why?

We would like to see more FinTech solutions that empower consumers/members/beneficiaries. Especially in those products/pension arrangements where the individual carries more or all the risks, those individuals need better information and an easy way of managing their risks.

Artificial intelligence and big data analytics for automated financial advice and execution

Please [refer to the corresponding section of the consultation document](#)  to read some contextual information before answering the questions.

Question 1.2: Is there evidence that automated financial advice reaches more consumers, firms, investors in the different areas of financial services (investment services, insurance, etc.)?

- ☒ Yes
- ☐ No
- ☐ Don't know / no opinion / not relevant

If there is evidence that automated financial advice reaches more consumers, firms, investors in the different areas of financial services, at what pace does this happen? And are these services better adapted to user needs? Please explain.

There is evidence that consumers/members/beneficiaries use or have access to more tools that provide up-to-date information on their products /arrangements. Such tools assist in suggesting ways that would perhaps be better suited to their needs. In the pensions area for example: tools that provide information on the expected income and expected costs of living of a household suggesting to explore effects of 1) higher/lower savings, 2) shifting retirement age and 3) changing costs of living.

Question 1.3: Is enhanced oversight of the use of artificial intelligence (and its underpinning algorithmic infrastructure) required? For instance, should a system of initial and ongoing review of the technological architecture, including transparency and reliability of the algorithms, be put in place?

- ☐ Yes
- ☐ No
- ☐ Don't know / no opinion / not relevant

Please elaborate on your answer to whether enhanced oversight of the use of artificial intelligence is required, and explain what could more effective alternatives to such a system be.

As actuaries we know that all models are imperfect but some models are useful. "Algorithmic infrastructure" consists basically of models of reality, only executed digitally. In that sense algorithms have the benefits and drawbacks in common with other models.

Actuaries have a standard on how to guarantee the models actuaries use are updated and utilized in a safe manner. Something similar could be appropriate in FinTech algorithms. One of the main dangers of models is the use of a model in a situation where the assumptions made when building the model are no longer valid.

It is however a different question to think there is a need for new regulation if something similar would be applied in Fintech. Fintech is a developing, rapidly-changing area. It is difficult to think that regulation could be the correct tool. It could perhaps be best to just highlight the issue and give some best practice principles for the actors.

Question 1.4: What minimum characteristics and amount of information about the service user and the product portfolio (if any) should be included in algorithms used by the service providers (e.g. as regards risk profile)?


See 1.3.

Question 1.5: What consumer protection challenges/risks have you identified with regard to artificial intelligence and big data analytics (e.g. robo-advice)? What measures, do you think, should be taken to address these risks/challenges?

Traditionally the consumer has had more knowledge of his/her situation compared to the service provider. With Big Data this can change, i.e. there could be information asymmetry for the benefit of the provider. Whether this needs any specific measures depends on whether this information asymmetry will be used for the benefit or the detriment of the customer.

One major issue in this area is the ownership or control of data. We think the consumer should always be the owner (or have explicit control) of the data collected with respect to his/her situation. This would put the customer in a radically better position with respect to this information asymmetry. As a result we would like to see that the consumer always explicitly has to agree with the use of their data.

Social media and automated matching platforms: funding from the crowd

Please [refer to the corresponding section of the consultation document](#)  to read some contextual information before answering the questions.

Question 1.6: Are national regulatory regimes for crowdfunding in Europe impacting on the development of crowdfunding?

- ☐ Yes
- ☐ No
- ☐ Don't know / no opinion / not relevant

Please elaborate on your reply to whether there are national regulatory regimes for crowdfunding in Europe impacting on the development of crowdfunding. Explain in what way, and what are the critical components of those regimes.

We don't have a full overview of regulatory regimes for crowdfunding. We are aware of the regime in The Netherlands, that has the following main elements: 1) it requires the consumer to do an investment test for amounts of € 500 and more, 2) it repeats test for every subsequent amount of € 5,000, 3) maximum investment (per platform) € 80,000 for loans and € 40,000 for equity, 4) information requirements for platform for each investment, 5) governance /management requirements, 6) risk assessment for each investment including description of the risk assessment approach, 7) money of investors is separated from money of the platform (third party account), 8) information requirements to supervisor including incident reporting.


Question 1.7: How can the Commission support further development of FinTech solutions in the field of non-bank financing, i.e. peer-to-peer/marketplace lending, crowdfunding, invoice and supply chain finance?

It needs to be recognized that there are not only opportunities but also risks in this area. The risks seem to be addressed in other questions of the survey, however.
The Commission could help in sharing of good practices across Member States.

Question 1.8: What minimum level of transparency should be imposed on fund-raisers and platforms? Are self-regulatory initiatives (as promoted by some industry associations and individual platforms) sufficient?

We consider that the minimum level of transparency should include risk assessment framework, description of loan/equity characteristics and bad debt reporting. Self-regulatory initiatives could be a good starting point as they are grounded on the day-to-day experience of the platforms. Formalising these is probably necessary in order to achieve a common level of good practice in a jurisdiction which will benefit the consumer as well as the platforms. At the same time sufficient freedom is needed in order to explore new and innovative ways.

Sensor data analytics and its impact on the insurance sector

Please [refer to the corresponding section of the consultation document](#)  to read some contextual information before answering the questions.

Question 1.9: Can you give examples of how sensor data analytics and other technologies are changing the provision of insurance and other financial services? What are the challenges to the widespread use of new technologies in insurance services?

As mentioned in our answer to 1.5, information asymmetry can change its direction. The challenge will be to see that the situation will be used for the benefit of the customer. If competition is sufficient this should happen automatically.

Question 1.10: Are there already examples of price discrimination of users through the use of big data?

- ☐ Yes
- ☐ No
- ☐ Don't know / no opinion / not relevant

Please provide examples of what are the criteria used to discriminate on price (e.g. sensor analytics, requests for information, etc.)?


In voluntary insurance it has always been the case that insurers try to price risks as exactly as possible. Therefore there is nothing in principle new in making even more exact pricing possible. This use of data is not discrimination but instead one of the cornerstones of efficient use of the insurance principle, i.e. pooling of risks.

Sometimes it has been argued that new technologies make insurance obsolete as the risk is perfectly known. The risk might be perfectly known in the future but that does not make insurance obsolete – the realization of certain risks is still stochastic in nature. Therefore pooling of risks still makes sense. This pooling can ideally become more efficient with better analytical tools.

Better differentiation thus creates opportunities for more efficient use of the insurance principle. But the real question is whether the opportunities are used for the benefit of the customer and the society in general. It can also happen that new possibilities are only used for premium optimization (charging higher premiums from customers who are less price sensitive). If markets are competitive this should be less of a problem.


It should also be understood that in social insurance and other compulsory insurance it should continue to be the case that certain tariff factors are prohibited to use.

Other technologies that may improve access to financial services

Please [refer to the corresponding section of the consultation document](#)  to read some contextual information before answering the questions.

Question 1.11: Can you please provide further examples of other technological applications that improve access to existing specific financial services or offer new services and of the related challenges? Are there combinations of existing and new technologies that you consider particularly innovative?

2. Bringing down operational costs and increasing efficiency for the industry

Please [refer to the corresponding section of the consultation document](#)  to read some contextual information before answering the questions.

FinTech has the potential of bringing benefits, including cost reductions and faster provision of financial services, e.g., where it supports the streamlining of business processes. Nonetheless, FinTech applied to operations of financial service providers raises a number of operational challenges, such as cyber security and ability to overcome fragmentation of standards and processes across the industry. Moreover, potential redundancy of specific front, middle and back-office functions or even of entire market players due to automation via FinTech solutions might have adverse implications in terms of employment in the financial industry, even though new jobs would also be created as part of the FinTech solutions. The latter, however, might require a different skill mix, calling for flanking policy measures to cushion their impact, in particular by investing in technology skills and exact science education (e.g. mathematics).

Question 2.1: What are the most promising use cases of FinTech to reduce costs and improve processes at your company? Does this involve collaboration with other market players?


Question 2.2: What measures (if any) should be taken at EU level to facilitate the development and implementation of the most promising use cases? How can the EU play its role in developing the infrastructure underpinning FinTech innovation for the public good in Europe, be it through cloud computing infrastructure, distributed ledger technology, social media, mobile or security technology?

Access to data will be an important issue. We wonder whether EU should promote the development of data banks containing the raw material of the future, i.e. certain Big Data. It could be possible to support the ownership issue mentioned in our answer to question 1.5.

Question 2.3: What kind of impact on employment do you expect as a result of implementing FinTech solutions? What skills are required to accompany such change?


New technologies are always expected to destroy existing employment but in practice this has not been the case to date. One needs to wonder whether this time is different. We do believe though that given the current state of technological possibilities it will not only affect low skills jobs, but more and more high skill jobs as well. (e.g. IBM Watson can provide specialized expert diagnosis of patients that were thought to remain the exclusive field of highly trained medical doctors.) But holders of high skill jobs will usually be better equipped to move higher in the efficiency ladder.

RegTech: bringing down compliance costs

Please [refer to the corresponding section of the consultation document](#)  to read some contextual information before answering the questions.

Question 2.4: What are the most promising use cases of technologies for compliance purposes (RegTech)? What are the challenges and what (if any) are the measures that could be taken at EU level to facilitate their development and implementation?

Recording, storing and securing data: is cloud computing a cost effective and secure solution?

Please [refer to the corresponding section of the consultation document](#)  to read some contextual information before answering the questions.

Question 2.5.1: What are the regulatory or supervisory obstacles preventing financial services firms from using cloud computing services?

At least in some cases national authorities are requiring duplicating systems within national borders that certainly is an obstacle.

Question 2.5.2: Does this warrant measures at EU level?

- ☐ Yes
- ☐ No
- ☐ Don't know / no opinion / not relevant

Please elaborate on your reply to whether the regulatory or supervisory obstacles preventing financial services firms from using cloud computing services warrant measures at EU level.

Question 2.6.1: Do commercially available cloud solutions meet the minimum requirements that financial service providers need to comply with?

- ☐ Yes
- ☐ No
- ☐ Don't know / no opinion / not relevant


Please elaborate on your reply to whether commercially available cloud solutions do meet the minimum requirements that financial service providers need to comply with.

Question 2.6.2: Should commercially available cloud solutions include any specific contractual obligations to this end?

- ☐ Yes
- ☐ No
- ☐ Don't know / no opinion / not relevant

Please elaborate on your reply to whether commercially available cloud solutions should include any specific contractual obligations to this end.

Disintermediating financial services: is Distributed Ledger Technology (DLT) the way forward?

Please [refer to the corresponding section of the consultation document](#)  to read some contextual information before answering the questions.


Question 2.7: Which DLT applications are likely to offer practical and readily applicable opportunities to enhance access to finance for enterprises, notably SMEs?

Question 2.8: What are the main challenges for the implementation of DLT solutions (e.g. technological challenges, data standardisation and interoperability of DLT systems)?

Question 2.9: What are the main regulatory or supervisory obstacles (stemming from EU regulation or national laws) to the deployment of DLT solutions (and the use of smart contracts) in the financial sector?

Prevailing uncertainty is an obstacle - there is the danger of supervisory prohibition in the future for large investments made today.

Outsourcing and other solutions with the potential to boost efficiency

Please [refer to the corresponding section of the consultation document](#)  to read some contextual information before answering the questions.

Question 2.10: Is the current regulatory and supervisory framework governing outsourcing an obstacle to taking full advantage of any such opportunities?

- ☐ Yes
- ☐ No
- ☐ Don't know / no opinion / not relevant

Please elaborate on your reply to whether the current regulatory and supervisory framework governing outsourcing is an obstacle to taking full advantage of any such opportunities.

Question 2.11: Are the existing outsourcing requirements in financial services legislation sufficient?

- ☐ Yes
- ☐ No
- ☐ Don't know / no opinion / not relevant


Please elaborate on your reply to whether the existing outsourcing requirements in financial services legislation are sufficient, precising who is responsible for the activity of external providers and how are they supervised. Please specify, in which areas further action is needed and what such action should be.

Other technologies that may increase efficiency for the industry

Question 2.12: Can you provide further examples of financial innovations that have the potential to reduce operational costs for financial service providers and/or increase their efficiency and of the related challenges?

A platform like 'Hi There' (<http://hi-there.community/>) offers a full cloud based system for setting up and running an insurance company. Such platforms are expected to drive down the operational costs to historical lows and at the same time improving the transparency and information to consumers as well as providing high level risk assessment possibilities for the management of the insurer.

3. Making the single market more competitive by lowering barriers to entry

Please [refer to the corresponding section of the consultation document](#)  to read some contextual information before answering the questions.

A key factor to achieving a thriving and globally competitive European financial sector that brings benefits to the EU economy and its society is ensuring effective competition within the EU single market. Effective competition enables new innovative firms to enter the EU market to serve the needs of customers better or do so at a cheaper price, and this in turn forces incumbents to innovate and increase efficiency themselves. Under the EU Digital Single Market strategy, the EU regulatory framework needs to be geared towards fostering technological development, in general, and supporting the roll-out of digital infrastructure across the EU, in particular. Stakeholder feedback can help the Commission achieve this goal by highlighting specific regulatory requirements or supervisory practices that hinder progress towards the smooth functioning of the Digital Single Market in financial services. Similarly, such feedback would also be important to identify potential loopholes in the regulatory framework that adversely affect the level playing field between market participants as well as the level of consumer protection.

Question 3.1: Which specific pieces of existing EU and/or Member State financial services legislation or supervisory practices (if any), and how (if at all), need to be adapted to facilitate implementation of FinTech solutions?

Question 3.2.1: What is the most efficient path for FinTech innovation and uptake in the EU?


With due respect to regulators, we do not think that their role is to take things forward but to ensure that there are no undue obstacles to progress so as to create an environment for innovation.

The experimenting parties should only be required to assess the pros and cons for the stakeholders. Consumer protection and consumer empowerment would be important elements.


Question 3.2.2: Is active involvement of regulators and/or supervisors desirable to foster competition or collaboration, as appropriate, between different market actors and new entrants?

- ☐ Yes
- ☐ No
- ☐ Don't know / no opinion / not relevant

FinTech has reduced barriers to entry in financial services markets

Please [refer to the corresponding section of the consultation document](#)  to read some contextual information before answering the questions.

But remaining barriers need to be addressed

Please [refer to the corresponding section of the consultation document](#)  to read some contextual information before answering the questions.

Question 3.3: What are the existing regulatory barriers that prevent FinTech firms from scaling up and providing services across Europe? What licensing requirements, if any, are subject to divergence across Member States and what are the consequences? Please provide the details.

We think the three principles noted above are a sound basis.

Question 3.4: Should the EU introduce new licensing categories for FinTech activities with harmonised and proportionate regulatory and supervisory requirements, including passporting of such activities across the EU Single Market?

- ☒ Yes
- ☐ No
- ☐ Don't know / no opinion / not relevant

If the EU should introduce new licensing categories for FinTech activities with harmonised and proportionate regulatory and supervisory requirements, including passporting of such activities across the EU Single Market, please specify in which specific areas you think this should happen and what role the ESAs should play in this. For instance, should the ESAs play a role in pan-EU registration and supervision of FinTech firms?

Perhaps yes, based on the good practices that already exist. At the same time it is important to have possibilities for further innovation that should not (immediately) be bound by all sorts of legislation and restrictions.

Question 3.5: Do you consider that further action is required from the Commission to make the regulatory framework more proportionate so that it can support innovation in financial services within the Single Market?

- ☐ Yes
- ☐ No
- ☐ Don't know / no opinion / not relevant

Question 3.6: Are there issues specific to the needs of financial services to be taken into account when implementing free flow of data in the Digital Single Market?

- ☐ Yes
- ☐ No
- ☐ Don't know / no opinion / not relevant

Please elaborate on your reply to whether there are issues specific to the needs of financial services to be taken into account when implementing free flow of data in the Digital Single Market, and explain to what extent regulations on data localisation or restrictions on data movement constitute an obstacle to cross-border financial transactions.


Question 3.7: Are the three principles of technological neutrality, proportionality and integrity appropriate to guide the regulatory approach to the FinTech activities?

- ☐ Yes
- ☐ No
- ☐ Don't know / no opinion / not relevant

Please elaborate on your reply to whether the three principles of technological neutrality, proportionality and integrity are or not appropriate to guide the regulatory approach to the FinTech activities.

See 3.3

Role of supervisors: enabling innovation

Please [refer to the corresponding section of the consultation document](#)  to read some contextual information before answering the questions.

Question 3.8.1: How can the Commission or the European Supervisory Authorities best coordinate, complement or combine the various practices and initiatives taken by national authorities in support of FinTech (e.g. innovation hubs, accelerators or sandboxes) and make the EU as a whole a hub for FinTech innovation?

Question 3.8.2: Would there be merits in pooling expertise in the ESAs?

- ☐ Yes
- ☐ No
- ☐ Don't know / no opinion / not relevant

Please elaborate on your reply to whether there would be merits in pooling expertise in the European Supervisory Authorities.

Question 3.9: Should the Commission set up or support an "Innovation Academy" gathering industry experts, competent authorities (including data protection and cybersecurity authorities) and consumer organisations to share practices and discuss regulatory and supervisory concerns?

- ☒ Yes
- ☐ No
- ☐ Don't know / no opinion / not relevant

If you think the Commission should set up or support an "Innovation Academy" gathering industry experts, competent authorities (including data protection and cybersecurity authorities) and consumer organisations to share practices and discuss regulatory and supervisory concerns, please specify how these programs should be organised.

We ticked box Yes, since this was the only way to include below comment:

In our view, innovation doesn't need much structure and creating the possibility of a free state environment for innovation that also smaller parties could apply for, would result in more innovation than creating a European Innovation Academy.

Question 3.10.1: Are guidelines or regulation needed at the European level to harmonise regulatory sandbox approaches in the MS?

- ☐ Yes
- ☐ No
- ☐ Don't know / no opinion / not relevant

Please elaborate on your reply to whether guidelines or regulation are needed at the European level to harmonise regulatory sandbox approaches in the MS?


Again the three principles are valid here. Those outside the sandbox should however not get sand into their eyes, thrown from the sandbox.

Question 3.10.2: Would you see merits in developing a European regulatory sandbox targeted specifically at FinTechs wanting to operate cross-border?

- ☐ Yes
- ☐ No
- ☐ Don't know / no opinion / not relevant

Question 3.11: What other measures could the Commission consider to support innovative firms or their supervisors that are not mentioned above?

Role of industry: standards and interoperability

Please [refer to the corresponding section of the consultation document](#)  to read some contextual information before answering the questions.

Question 3.12.1: Is the development of technical standards and interoperability for FinTech in the EU sufficiently addressed as part of the European System of Financial Supervision?

- ☐ Yes
- ☐ No
- ☐ Don't know / no opinion / not relevant

Please elaborate on your reply to whether the development of technical standards and interoperability for FinTech in the EU is sufficiently addressed as part of the European System of Financial Supervision.

Question 3.12.2: Is the current level of data standardisation and interoperability an obstacle to taking full advantage of outsourcing opportunities?

- ☐ Yes
- ☐ No
- ☐ Don't know / no opinion / not relevant

Please elaborate on your reply to whether the current level of data standardisation and interoperability is an obstacle to taking full advantage of outsourcing opportunities.

Question 3.13: In which areas could EU or global level standards facilitate the efficiency and interoperability of FinTech solutions? What would be the most effective and competition-friendly approach to develop these standards?

Question 3.14: Should the EU institutions promote an open source model where libraries of open source solutions are available to developers and innovators to develop new products and services under specific open sources licenses?

- ☐ Yes
- ☐ No
- ☐ Don't know / no opinion / not relevant

Please elaborate on your reply to whether the EU institutions should promote an open source model where libraries of open source solutions are available to developers and innovators to develop new products and services under specific open sources licenses, and explain what other specific measures should be taken at EU level.


EU could consider the idea of an open data bank, mentioned already above.

Challenges

Please [refer to the corresponding section of the consultation document](#)  to read some contextual information before answering the questions.

Question 3.15: How big is the impact of FinTech on the safety and soundness of incumbent firms? What are the efficiencies that FinTech solutions could bring to incumbents? Please explain.


4. Balancing greater data sharing and transparency with data security and protection needs

Please [refer to the corresponding section of the consultation document](#)  to read some contextual information before answering the questions.

Question 4.1: How important is the free flow of data for the development of a Digital Single Market in financial services? Should service users (i.e. consumers and businesses generating the data) be entitled to fair compensation when their data is processed by service providers for commercial purposes that go beyond their direct relationship?

The open data bank could be a tool also here.

Storing and sharing financial information through a reliable tool

Please [refer to the corresponding section of the consultation document](#)  to read some contextual information before answering the questions.

Question 4.2: To what extent could DLT solutions provide a reliable tool for financial information storing and sharing? Are there alternative technological solutions?


Question 4.3: Are digital identity frameworks sufficiently developed to be used with DLT or other technological solutions in financial services?

- ☐ Yes
- ☐ No
- ☐ Don't know / no opinion / not relevant

Please elaborate on your reply to whether digital identity frameworks are sufficiently developed to be used with DLT or other technological solutions in financial services.

Question 4.4: What are the challenges for using DLT with regard to personal data protection and how could they be overcome?

The power of big data to lower information barriers for SMEs and other users

Please [refer to the corresponding section of the consultation document](#)  to read some contextual information before answering the questions.


Question 4.5: How can information systems and technology-based solutions improve the risk profiling of SMEs (including start-up and scale-up companies) and other users?

Again the idea of an open data bank could be considered here.

Question 4.6: How can counterparties that hold credit and financial data on SMEs and other users be incentivised to share information with alternative funding providers ? What kind of policy action could enable this interaction? What are the risks, if any, for SMEs?

See 4.5

Security

Please [refer to the corresponding section of the consultation document](#)  to read some contextual information before answering the questions.


Question 4.7: What additional (minimum) cybersecurity requirements for financial service providers and market infrastructures should be included as a complement to the existing requirements (if any)? What kind of proportionality should apply to this regime?

Question 4.8: What regulatory barriers or other possible hurdles of different nature impede or prevent cyber threat information sharing among financial services providers and with public authorities? How can they be addressed?

Question 4.9: What cybersecurity penetration and resilience testing in financial services should be implemented? What is the case for coordination at EU level? What specific elements should be addressed (e.g. common minimum requirements, tests, testing scenarios, mutual recognition among regulators across jurisdictions of resilience testing)?

We think transparency of companies when it comes to cyber risks they encounter will help the market forward.

Other potential applications of FinTech going forward

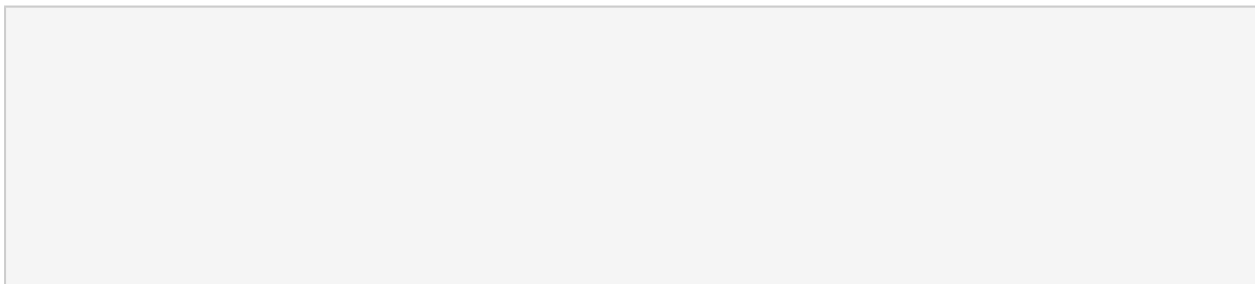
Please [refer to the corresponding section of the consultation document](#)  to read some contextual information before answering the questions.

Question 4.10.1: What other applications of new technologies to financial services, beyond those above mentioned, can improve access to finance, mitigate information barriers and/or improve quality of information channels and sharing?

Question 4.10.2: Are there any regulatory requirements impeding other applications of new technologies to financial services to improve access to finance, mitigate information barriers and/or improve quality of information channels and sharing?

- ☐ Yes
- ☐ No
- ☐ Don't know / no opinion / not relevant

Please elaborate on your reply to whether there are any regulatory requirements impeding other applications of new technologies to financial services to improve access to finance, mitigate information barriers and/or improve quality of information channels and sharing?



3. Additional information

Should you wish to provide additional information (e.g. a position paper, report) or raise specific points not covered by the questionnaire, you can upload your additional document(s) here:

Useful links

[More on the Transparency register \(http://ec.europa.eu/transparencyregister/public/homePage.do?locale=en\)](http://ec.europa.eu/transparencyregister/public/homePage.do?locale=en)

[Consultation details \(http://ec.europa.eu/info/finance-consultations-2017-fintech_en\)](http://ec.europa.eu/info/finance-consultations-2017-fintech_en)

[Specific privacy statement \(https://ec.europa.eu/info/sites/info/files/2017-fintech-specific-privacy-statement_en.pdf\)](https://ec.europa.eu/info/sites/info/files/2017-fintech-specific-privacy-statement_en.pdf)

Contact

fisma-fintech@ec.europa.eu
