

Fair Use Explained

- Templates and Guardrails for SEBI
Entities use cases on Account
Aggregator

Presented by:
Geethashree Srikanta





Agenda

- ❖ Introduction to Fair Use Framework
- ❖ Fair Use Templates and Guardrails for SEBI Entities
- ❖ **What do these templates and guardrails mean?**
 - One Consent One Purpose
 - PFM vs WMS
 - Dos and Don'ts of Recurring Consents
 - Relevant Codes of Conduct
 - Best Practices Recommended
- ❖ Q&A



- **This session is not about how to do advisory or wealth management, it is about how those activities must be structured when you use the AA rails for accessing customer data.**
- This session **does not prescribe product features or business model**, but focuses on **how consents and data usage must align with Fair Use templates and guardrails.**
- This session is **not a substitute for, or proxy to**, regulatory or compliance approvals within each Regulated Entity, wherever applicable.
- **Feedback on templates and guardrails is welcome**; however, **feedback related to FIP performance will not be covered in this session.**

For such queries, please write to info@sahamati.org.in, and the team will guide you to the appropriate forum.

- **Q&A will be taken at the end of the session.**

You are requested to **hold your questions until all topics are covered**, and raise any gaps or clarifications during the Q&A segment.

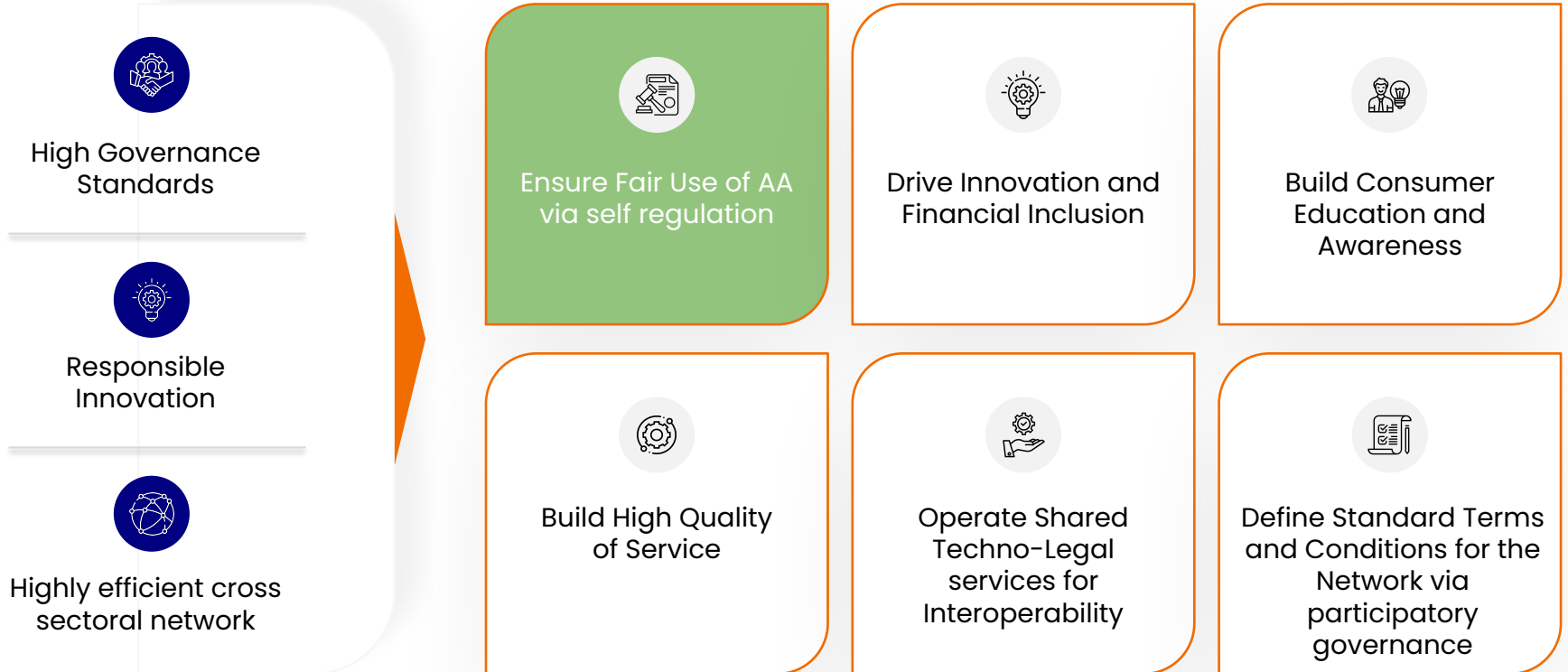


Fair Use Explained!

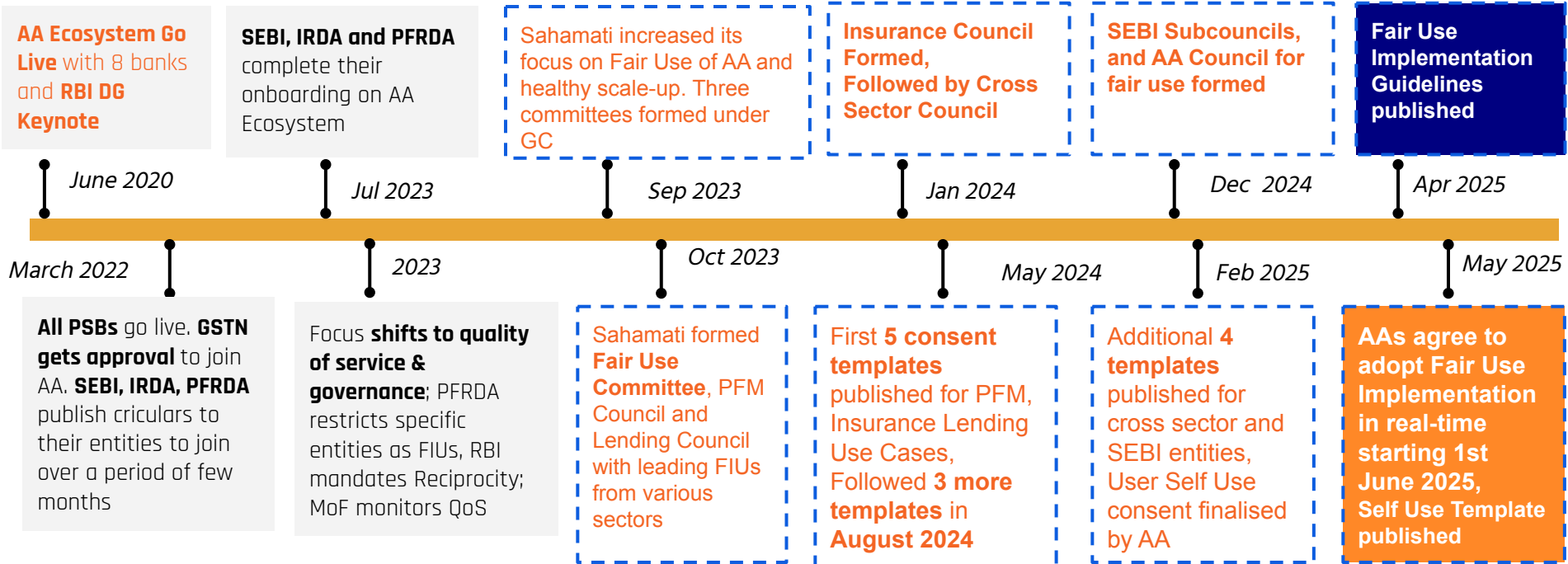
Introduction to Fair Use Framework



Role played by Sahamati in the AA Ecosystem



Define. Detect. Deter: Tracing the Fair Use Implementation Timeline



Fair Use Implementation – Roles & Responsibilities



FIUs - Primary Responsibility for implementation

- Responsible for implementing Fair Use Templates for their use cases.
- Implementation by FIUs reduces checker burden on AAs and FIPs.

AAs - First Level Checking of incoming consent requests

- Act as the primary checker of consent requests against Fair Use Templates.
- Responsible for educating and sensitising FIUs to implement Fair Use Templates
- Ensure deviant requests are identified on an automated basis
- Block deviant requests
- Share regular fair use progress reports to support ecosystem governance

FIPs - Second Level Checking of incoming consent requests (voluntary)

- Act as a second-level checker of consent requests.
- May develop mechanisms to identify deviant requests on an automated basis
- Block deviant requests
- Share regular fair use progress reports to support ecosystem governance

Fair Use Template – What is it and how to use it?



A Fair Use Template defines the **upper bounds** for consent attributes for a specific use case.

- The purpose code associated with a template is fixed, while all other consent attributes represent maximum permissible limits.
- FIUs are expected to select values that are **lower than or equal to these limits** based on their actual use case.
- Using the maximum values in the template is **not mandatory** to meet **YOUR data minimisation requirements**.



Community Asset



Reference data points and upper limits for known use cases



Are NOT Purpose Codes



Are NOT suggested Use Case for any specific license



Are NOT legal advice on Use Case for any license



Are NOT mandatory consent attributes for an use case



Fair Use Explained!

Fair Use Templates and Guardrails – SEBI Entities

Fair Use Templates - SEBI Entities

- Fair Use Template Library or Sahamati **does not determine or validate the charter alignment** between an entity's regulatory licence and its use case. The responsibility for such **charter alignment and selecting the Template ID** rests with the respective FIU and its compliance framework.
- Based on the nature of use cases and underlying activities, the Council has drawn distinctions across templates. Where the FIU Council has discussed and arrived at a common understanding on applicable licences during template deliberations, the same has been captured here for reference.

Fair Use Template IDs	Consent Type	Purpose Code	Use Case Category	Council Remarks / Coverage
CT004	Periodic	101	Wealth Management Services	Designed for advisory and wealth management (manufacturers) services only
CT008	Periodic	102	Personal Finance Management	Designed for dashboards and analytics (distributors) for financial planning
CT010	One-Time	105	FNO Services Onboarding	Designed as per rules for Onboarding customers on to derivative segment
CT040	One-Time	105	Cross Validation of Accounts	A generic template for any FIU requiring cross verification of accounts as per their license regulations
CT043	Periodic	104	Compliance Reporting of Employees	Designed for all entities covered under SEBI PIT Regulations
CT047	Periodic	104	Monitoring by Credit Rating Agency	Designed for CRAs



[Click to view Fair Use Template Library](#)

Guardrails and Codes of Conduct - SEBI Entities



Code	Summary of the Code	Rationale (Why this matters)
CC020	FIUs must not repeat the same data request to Depositories/RTAs within a calendar day if already successfully received	Avoids redundant requests, reduces system load, and limits unnecessary data exposure
CC027	Purpose Code 102 must be used strictly as per the FIU's regulatory charter / licence	Prevents misuse of PFM flows and ensures FIUs are aligned with their regulatory charter
CC028	Purpose Code 102 must be used strictly for providing insights, reporting, and recommendations incidental to personal finance management. A separate, purpose-specific consent must be sought in case of taking the customer through any other product or service journey.	Prevents blanket consent structures where data collected under a single PFM consent is repurposed for multiple uses. - Ensures clear purpose limitation, avoids misuse of PFM data for cross-sell or underwriting, etc.
CC030	FIUs may fetch only incremental data in case of subsequent data pulls under recurring consents	Promotes data minimisation and responsible data usage
CC031	FI date range must be clearly classified for SEBI and Non-SEBI FI Types in the consent notice	Improves customer understanding and transparency at the point of consent
CC032	Overriding consent on top of AA-obtained data is not permitted	Preserves consent integrity and prevents scope overreach
CC034	Technical guardrails defined for FIUs using CT040 (Bank Account Verification) - only One Account is used for cross validation	Ensures the use case is not misused beyond its intended verification purpose

Fair Use Template CT004 - Wealth Management Services



Template Information	Description	Remarks
Consent Template ID	CT004	For Sahamati's internal records and explanation to the community
Status	Active	For Sahamati's internal records and explanation to the community
Use Case Category	Personal Finance	For Sahamati's internal records and explanation to the community
Use case	Wealth Management Services	To be used by FIUs that have an advisory charter under which they get into advisory contracts with the customer. Further, the FIUs have a fiduciary relationship with the customers which means they act as an advisor of the customer (and not as a distributor) and earn their fees/commission from the customer

Fair Use Template CT004 - Wealth Management Services



Consent Details (Attributes)	Values (as agreed in the Council)	Rationale
Purpose Text	As agreed by FIUs to show to the customer: To provide (Wealth Management / Advisory) Services	To ensure that the purpose explains the underlying use case explicitly and is easy to understand for the customer. Only portfolio managers offering non discretionary portfolio services can decide not to write the word advisory in the purpose text
Purpose Code	101 / Personal Finance	As per ReBIT: Wealth management service
FI Types	DEPOSIT, TERM_DEPOSIT, RECURRING_DEPOSIT, SIP, EQUITIES, MUTUAL_FUNDS, ETF, IDR, CIS, AIF, INVIT, REIT, LIFE_INSURANCE, GENERAL_INSURANCE, NPS, GSTR1_3B, INSURANCE_POLICIES	Requires a 360 degree view of a consumer finances and their profile to be able to provide advisory or portfolio management services
Consent Types	Profile, Summary, and Transactions	
Fetch-type	Periodic	Requires a regular view of the customers finances to be able to provide advisory or portfolio management services
Maximum Frequency	31 per month	-Based on Poll conducted among the Council members, 22 fetches per month (exchange and market working days in a month) are sufficient for the purpose of advisory. -Currently SEBI FIPs share only two years data in one data fetch request. Wealth advisors need 20 years of mutual funds statement data of the customer to be able to calculate returns and investment purchase dates of customers. -Hence, a buffer of 9 fetches have been added to 22 fetches to enable the FIUs fetch 20 years of data from SEBI FI types in data packets of two years each.
Maximum FI Data Range	13 Months for other FI Types 20 years for SEBI FI Types	Deemed as sufficient to be able to offer wealth management or investment advisory for the customer While the Maximum FI Data Range is higher, the FIUs agree that they will do only incremental pulls over and above their last date of fetching data FIUs have agreed to not fetch insurance data on daily basis
Maximum Consent Validity	1 Year	Based on Usual tenure of the Wealth Management and Portfolio Management Agreements
Maximum Data Life	1 month	Considering as sufficient time for the FIU required to analyse the information and provide recommendations/advisory to the customer

 [Click to view template with rationale](#)

Implementation of Fair Use Templates

Defines **maximum values** for the attributes mentioned in consent artefact

Recommendation for common Purpose text per use case

CT004 - Wealth Management Services

PURPOSE TEXT To provide Wealth Management and Advisory Services

PURPOSE CODE 101

PURPOSE CATEGORY Personal Finance

ALLOWED FI TYPES DEPOSIT, TERM_DEPOSIT, RECURRING_DEPOSIT, SIP, CP, GOVT_SECURITIES, EQUITIES, BONDS, DEBENTURES, MUTUAL_FUNDS, ETF, IDR, CIS, AIF, INVIT, REIT, GSTR1_3B

CONSENT TYPES Profile, Summary, Transactions

FETCH-TYPE Periodic

MAXIMUM FREQUENCY 31 per month

MAXIMUM DATA RANGE FI Types other than SEBI FI Types
13 months
SEBI FI Types
10 Years

MAXIMUM CONSENT VALIDITY 1 year

DATA LIFE 1 month

Consent Screen Shown to Customer

ACCOUNTS SHARED WITH MoneyBox

PURPOSE FOR SHARING To provide Wealth Management and Advisory Services

PURPOSE CODE AND CATEGORY 101, Personal Finance

ACCOUNTS SHARED (3)

- Axis Savings Account • 0245
- HDFC Savings Account • 2785
- SBI Contra Fund Folio No. • 1914

i These selected accounts are also saved by Ekjut for quick sharing in the future.

INFORMATION SHARED From Bank Accounts
Profile, Summary, Transactions
(17 Oct 2023 - 17 Nov 2025)

From Mutual Funds
Current Balance, Profile Information
(17 Nov 2014 - 17 Nov 2025)

CONSENT VALIDITY From 17 Nov 2024 to 17 Nov 2025

FREQUENCY OF ACCESS MoneyBox would like to access your data 31 times a month

DATA LIFE MoneyBox will purge the data within 1 month

 **Swipe to approve consent** >

Decline

Fair Use Template CT008 - Personal Finance Management



Template Information	Description	Remarks
Consent Template ID	CT008	For Sahamati's internal records and explanation to the community
Status	Active	For Sahamati's internal records and explanation to the community
Use Case Category	Personal Finance	For Sahamati's internal records and explanation to the community
Use case	Enabling insights into receipts and payments through transaction categorization, identification of merchant categories and the like	To be used by FIUs that have a distribution charter with an advisory element. However, the FIUs do not have a fiduciary relationship with the customers which means they act as either a manufacturer of financial services or as a distributor (regulated and registered by one of the four FSRs) for one or multiple manufacturers

 [Click to view template with rationale](#)

Fair Use Template CT004 - Personal Finance Management



Consent Details (Attributes)	Values (as agreed in the Council)	Rationale
Purpose Text	As agreed by FIUs to show to the customer: To generate insights based on your overall finances and provide incidental recommendations, if any	To ensure that the purpose explains the underlying use case explicitly and is easy to understand for the customer The primary purpose of this use case is to provide a front end analytics dashboard to the customer (spend, investment, budgeting, consolidated view etc) with an ability to provide nudges/recommendations based on the analytics and in line with the charter of the primary license of the PFM provider
Purpose Code	102 / Personal Finance	As per ReBIT: Customer spending patterns, budget or other reportings
FI Types	DEPOSIT, TERM_DEPOSIT, RECURRING_DEPOSIT, SIP, EQUITIES, MUTUAL_FUNDS, ETF, IDR, CIS, AIF, INVIT, REIT, LIFE_INSURANCE, GENERAL_INSURANCE, NPS, GSTR1_3B	Requires a 360 degree view of a customer finances to able to generate an integrated dashboard to the customer
Consent Types	Profile, Summary, Transactions	Requires a 360 degree view of a customer finances to be able to generate an integrated dashboard to the customer
Fetch-type	Periodic	Requires a regular view of the customers finances to able to advise on a continuous basis
Maximum Frequency	45 times per month	The maximum frequency is capped at 45 successful data fetches per month, incorporating: <ul style="list-style-type: none"> - 31 successful data fetches to allow PFM providers to enable auto fetch/daily dashboard refresh for regularly active customers based on the data shared by FIUs on the frequency at which their customers are accessing the PFM services - Monthly frequency cap as opposed to daily agreed to incorporate variance in intra-day usage levels - Buffer for poor data quality and inconsistency in data, requiring additional fetches - Currently SEBI FIPs share only two years data in one data fetch request. Wealth advisors need 10 years of mutual funds statement data of the customer to be able to calculate returns and investment purchase dates of customers. Hence, a buffer of 5 fetches has been provided to enable the FIUs fetch 10 years of data from SEBI FI types in data packets of two years each.

 [Click to view template with rationale](#)

Fair Use Template CT004 - Personal Finance Management



Consent Details (Attributes)	Values (as agreed in the Council)	Rationale
Maximum FI Data Range	10 years for SEBI FI Types 13 Months for others	<ul style="list-style-type: none">-Deemed as sufficient to build a spend analytics and/or investment analytics dashboard for the customer and provide yearly trends-Based on the frequency of the data pull, the FI Data Range is recommended to be incremental.-FIUs have agreed to not fetch insurance data on daily basis-While the Maximum FI Data Range is higher, the FIUs agree that they will do only incremental pulls over and above their last date of fetching data
Maximum Consent Validity	1 year	Council members agreed to have a one-year consent validity for the PFM use case as a fair period, post which the FIU will need to take a fresh consent from the customer. this is to ensure that data of inactive customers who haven't revoked the consent is not available to be pulled by the FIU beyond 1 year unless the customer gives a fresh consent

Implementation of Fair Use Templates





Defines **maximum values** for the attributes mentioned in consent artefact

Recommendation for common Purpose text per use case

CT008- Personal Finance Management

PURPOSE TEXT	To generate insights based on your overall finances and provide incidental recommendations, if any
PURPOSE CODE	102
PURPOSE CATEGORY	Personal Finance
ALLOWED FI TYPES	DEPOSIT, TERM_DEPOSIT, RECURRING_DEPOSIT, SIP, CP, GOVT_SECURITY, EQUITIES, BONDS, DEBENTURES, MUTUAL_FUNDS, ETF, IDR, CIS, AIF, INVIT, REIT, GSTR1_3B
CONSENT TYPES	Profile, Summary, Transactions
FETCH-TYPE	Periodic
MAXIMUM FREQUENCY	45 per month
MAXIMUM DATA RANGE	FI Types other than SEBI FI Types 13 months SEBI FI Types 10 Years
MAXIMUM CONSENT VALIDITY	1 year
DATA LIFE	1 month

Consent Screen Shown to Customer

ACCOUNTS SHARED WITH	MoneyBox
PURPOSE FOR SHARING	To generate insights based on your overall finances and provide incidental recommendations, if any
PURPOSE CODE AND CATEGORY	102, Personal Finance
ACCOUNTS SHARED (3)	 Axis Savings Account • 0245  HDFC Savings Account • 2785  SBI Contra Fund Folio No. • 1914
<p> These selected accounts are also saved by Ekjut for quick sharing in the future.</p>	
INFORMATION SHARED	From Bank Accounts Profile, Summary, Transactions (17 Oct 2023 - 17 Nov 2025) From Mutual Funds Current Balance, Profile Information (17 Nov 2014 - 17 Nov 2025)
CONSENT VALIDITY	From 17 Nov 2024 to 17 Nov 2025
FREQUENCY OF ACCESS	MoneyBox would like to access your data 45 times a month
DATA LIFE	MoneyBox will purge the data within 1 month



Swipe to approve consent



[Decline](#)



Fair Use Explained!

What do these templates and guardrails mean?

Why so many templates? **One Consent One Purpose**

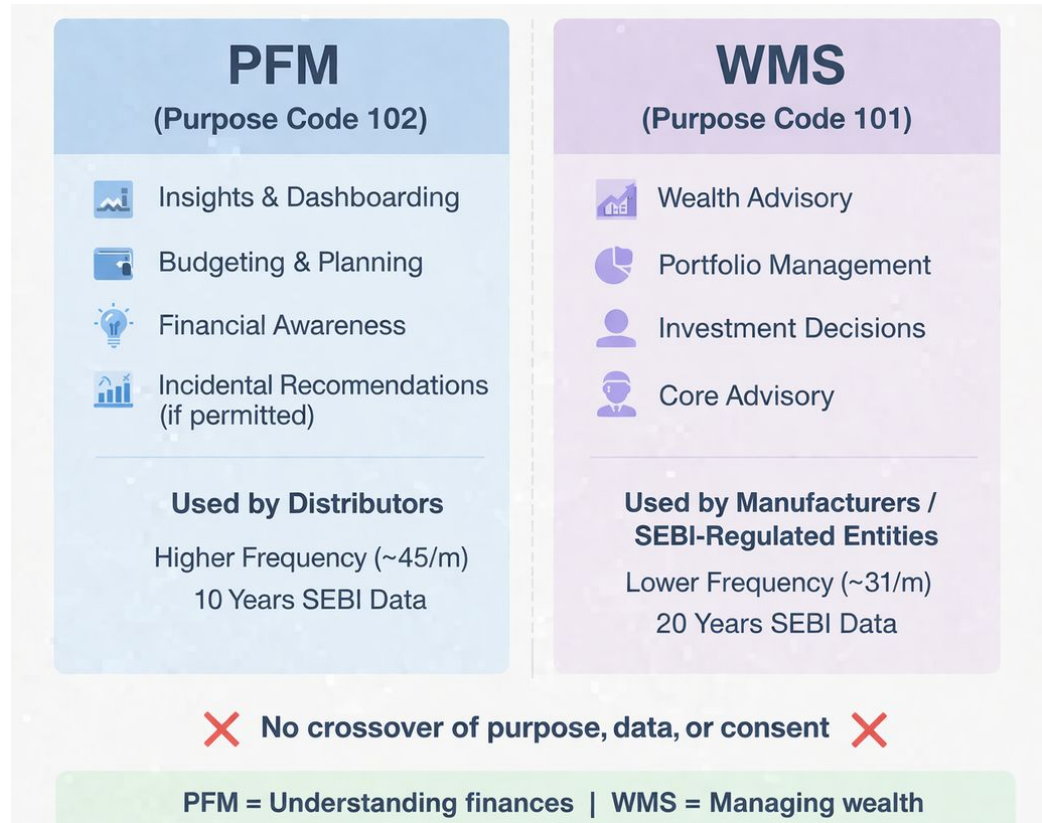
The AA Framework has adopted **One Purpose, One Consent principle**, as codified in the Common Code of Conduct for Sahamati Members (CC026):

- **Purpose-Specific Consent:** A consent artefact must map to a single, clearly defined purpose
- **Clear Customer Understanding:** The purpose of the consent must reflect explicitly what the customer has agreed to, how their data will be used for that one defined purpose, avoiding ambiguity.
- **Avoiding Purpose Expansion:** Using a single consent for multiple activities would expand the original purpose and allow access beyond the customer's intended data sharing requirement.



Distinct Templates for PFM vs WMS – Why and How?

- **ReBIT** defines separate purpose codes
 - **101** for Wealth Management Services and
 - **102 for** Personal Finance Management;
- **Councils defined templates** are designed to reflect this separation.
- **Different actors, different roles** - Manufacturers vs Distributors
- **Difference in Core offerings** - WMS enables advice and wealth related actions, whereas PFM enables insights, dashboarding, budgeting, and planning - **NOT** product execution.



Do's and Don'ts recommended for Recurring Consents - PFM & WMS



Do's

- **Separate Consent with defined and specific purpose**, so that the customer understands exactly what they are agreeing to.
- **Explicit and Informed Consent** - Customers must be **informed upfront about how their data will be used, how often it will be accessed, and how they can revoke consent**, especially in recurring use cases.
- **Data Minimisation is the key** - FIUs should collect only the data, frequency, and duration necessary for that purpose, rather than defaulting to maximum limits.
- Data must be **used strictly for the stated purpose**, without any extension to other services or journeys

Don'ts

- Do not use **blanket or multi-purpose consents**, as this defeats the construct of AA consent framework.
- Do not **reuse data across different service journeys**, even if the customer relationship continues.
- Do not allow **privacy policies or disclaimers to override AA consent**, which remains the primary record of authorisation.
- Do not **combine consent flows with service or product journeys**, as AA is meant only for consent management.

Clarity of purpose and discipline in usage are the foundation of all templates

Do's and Don'ts based on Code of Conduct



Do's

- Use Purpose Code 102 strictly in line with your **regulatory charter or licence (CC027)**
- Obtain a **separate, purpose-specific consent** before initiating any product or service journey following a recommendation under PFM (CC028)
- **Fetch only incremental data** in subsequent pulls under recurring consents (CC030)
- Clearly classify FI data range for **SEBI and Non-SEBI FI Types** in the consent notice (CC031)
- Data for only one account must be ensured technical guardrails are followed for specific use cases such as CT040 (Bank Account Verification) (CC034)

Don'ts

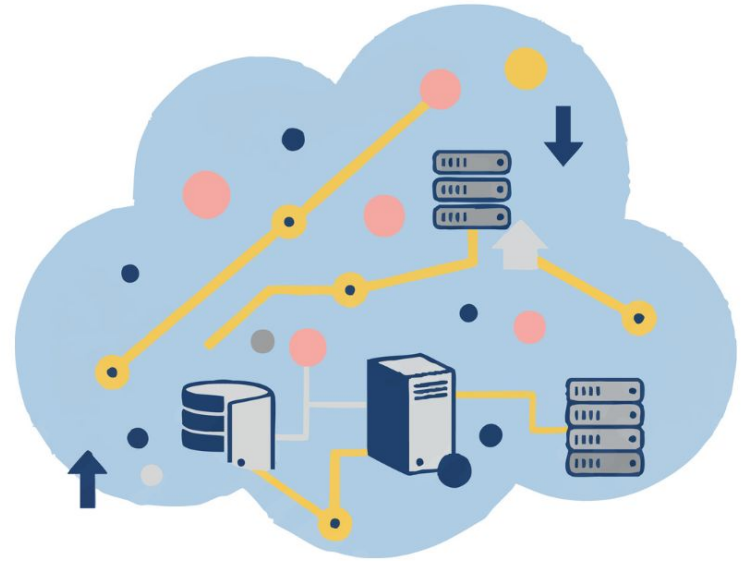
- **Do not repeat the same data request** to Depositories/RTAs within a calendar day if already successfully received (CC020)
- **Do not override AA-obtained consent** through additional or parallel consent mechanisms (CC032)
- **Do not reuse PFM data for product journeys**, obtain a separate consent for the data needed in case of product or service offerings (CC028)

These are enforceable boundaries, not design choices, under the Code of Conduct

Do's and Don'ts recommended for Recurring Consents - PFM / WMS



- Systems should **identify inactive users and avoid continuous background data pulls**, to prevent silent data collection.
- Data access should be **aligned with actual customer engagement**, such as user-triggered or need-based refresh.
- Customers should be given the **ability to delete or purge their data**, strengthening control beyond minimum requirements.
- **Sensitive personal data** (e.g., PAN) can be masked where full visibility is not required, to reduce exposure risk.
- Services should deliver insights and meaningful outputs, rather than simply **displaying raw financial data**.
- Add **security checks and protection** (passwords etc) for reports and findings





AA Journeys

Common UI/UX points to note in Lending-AA Journeys

To ensure Consent Screens enable **Informed and Explicit Customer Consent**



Consent Screen must have Key Consent Attributes for **Informed Consent**

Consent Screen must have Accept and Reject button for Affirmative action and **Explicit Consent**



←

Enter OTP to link bank account

Sent by Pirimid FinTech to +91 XXXXXXXXXX

1234

Resend OTP

Powered by

I authorize XXXXX to access my XXXXX XXXXXX account ending in XXXXe6fd to retrieve my last 6 month(s) bank statements for the purpose of Explicit one-time consent for the accounts. Data will be fetched one time and remains active for 1 month(s).

Submit and activate



Approve Consent

A/c No XXXXXXXX
DEFAULT

A/c No XXXXXXXX
SAVINGS

A/c No XXXXXXXX
DEFAULT

Link Another Account

Consent Details

Statement Period	04 Jan 24 - 04 Jul 24
Purpose	Explicit One Time Consent For The Accounts
Frequency	Once
Consent Validity	04 Jul 24 - 03 Aug 24
Data deleted before	30 day(s)
Account types	Deposit

Powered By

I hereby authorise XXXXX XXXXXXXX Private Limited to fetch my transaction details.

Reject Approve

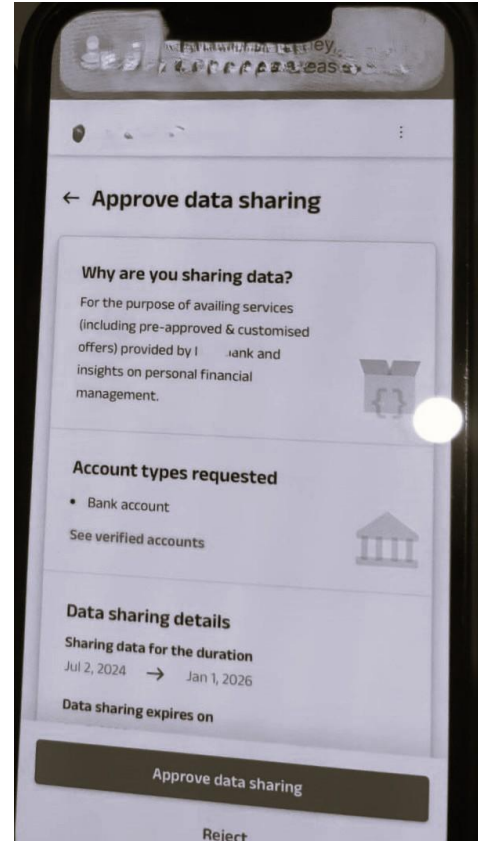
To ensure Consent Screens enable **Informed and Explicit Customer Consent**



X

One Consent One Purpose

Separate consents must be sought for two different use cases instead of merging or bundling into one consent

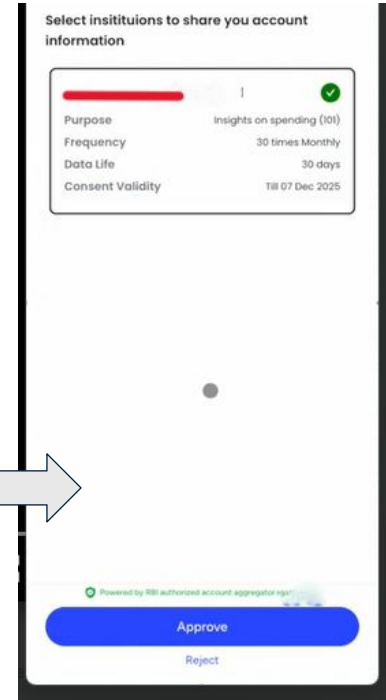
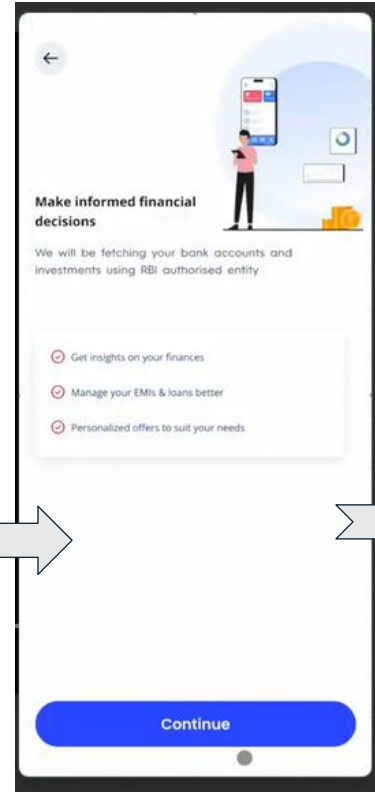
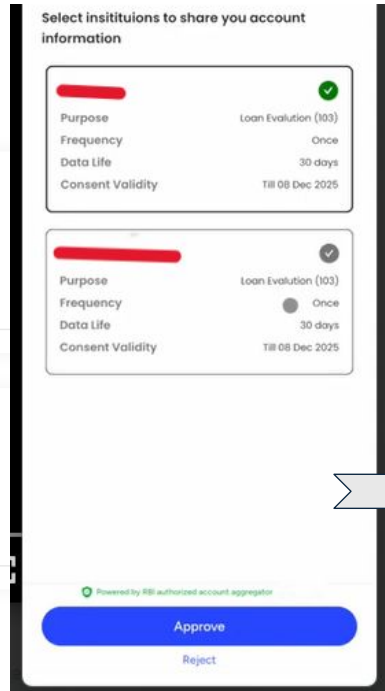


MUST not solicit FIU business within AA Journeys or Override AA Consents



AA screens are **not for solicitation** of business for FIUs

FIUs **must not** offer new use cases within the AA journey or add conditions in product journey that override the AA consents

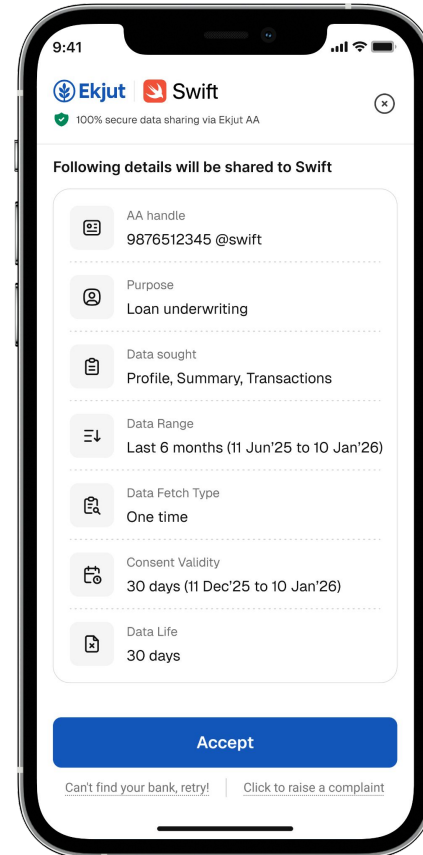


MUST have an option to accept or reject AA Consents



Auto-approval or default acceptance is not permitted.

The CTA for accept and reject should be labelled clearly.



A smiling woman in a saree is working in a shop, likely a grocery or food store. She is wearing a red and orange saree and has a bindi on her forehead. She is looking towards the camera with a warm smile. The background shows shelves stocked with various items, possibly food or household goods. The image is overlaid with a semi-transparent blue and orange geometric pattern.

Thank you!

If you have any questions reach out to us at fairuse@sahamati.org.in



Do's and Don'ts based on Code of Conduct

Consent Structuring & Purpose

- **Request for Consent with a clear and single purpose** → prevents bundling and ensures the customer knows exactly what they are agreeing to
- **Avoid blanket or open-ended consents** → prevents repurposing of data under a single consent
- **Avoid Privacy Policy or Disclaimers overriding the AA Consents** → aligned with RBI's AA Master Directions
- **Explain frequency, use, and revocation upfront** → builds informed consent since data access happens later
- **Keep AA flow strictly for consent** → avoid mixing service journeys with consent collection

Need-based Consent Collection

- **Recommended to take Consent when data sharing is required,** → avoid asking for a consent if there is no need for the customer to share data with the FIU
- **Limit Consent attributes for data collection strictly to what is necessary** for the stated purpose.
- **Maximum limits in fair use does not mean you have to collect data beyond your needs**
- **Align frequency and data range to actual need** → avoids over-collection and unnecessary data exposure



Do's and Don'ts recommended for **Recurring Consents - PFM & WMS**

Data Collection (During Fetch)

- **Fetch data only once per day** → repeated pulls return the same data and create avoidable load (CoC)
- **Use incremental data fetches** → ensures efficiency and continuity without duplication (CoC)
- **Build systems to identify and Avoid continuous pulls for inactive users** → prevents silent data collection without active customer engagement

Data Usage & Processing (Collection)

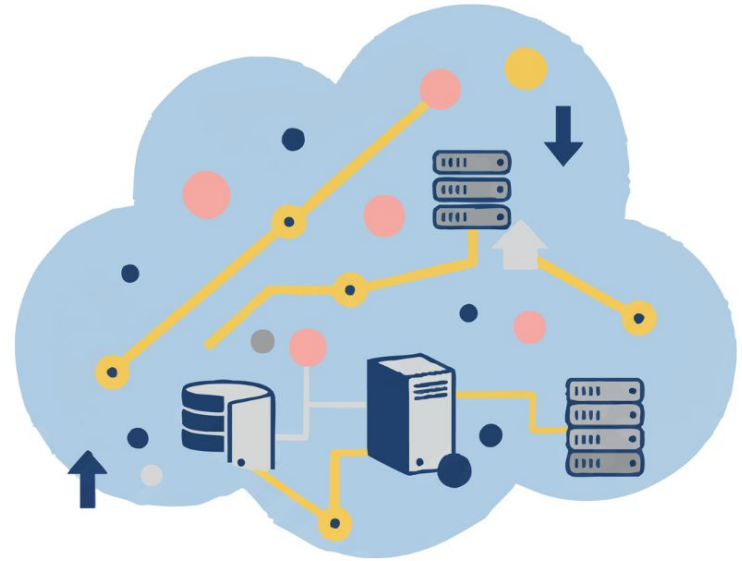
- **Use data strictly for the stated purpose** → prevents cross-use across services and maintains purpose limitation
- **Do not use PFM/WMS data for product journeys** → avoids bypassing onboarding, underwriting, and regulatory checks (CoC)
- **Respect data lifecycle (retain only as long as needed)** → reduces risk and aligns with regulatory expectations
- **Notify customers when data is accessed** → maintains transparency since access is not real-time to the user
- **Provide options for Consent revocation** → must under regulations
- **Good to allow options for data deletion** → gives customers control over ongoing data access
- **Recommended to Mask sensitive personal data where not required** → reduces exposure risk
- **Ensure outputs provide insights, not just raw data** → delivering value justifies the recurring access to data

Do's and Don'ts recommended for Recurring Consents - PFM / WMS



Data Minimisation & Storage

- **Notify** customers when **data is accessed** via AA, and also inform them when the **data is purged** as per the consent.
- Do not **reuse underwriting data collected** for an offer once the customer moves on from the application, take a fresh, purpose-aligned consent if needed.
- Do not **retain offer-stage data** once the offer lapses or is rejected.
- **Process data strictly within the defined data life** and for the stated purpose.
- Once the purpose is completed or data life expires (whichever is earlier):
 - **Move data out of active usage into archival storage**, as per regulatory requirements.
 - Do not repurpose the data or reuse the data for other activities or processes
- **Maintain records and audit trails** of data usage as required under applicable regulations.



Why PFM Template ≠ Lending Template



PFM Template (CT008)	Lending Template (CT003)
<p>Use case considered by Council</p> <p>To be used by FIUs that have a distribution charter with an advisory element. However, the FIUs do not have a fiduciary relationship with the customers which means they act as either a manufacturer of financial services or as a distributor (regulated and registered by one of the four FSRs) for one or multiple manufacturers</p>	<p>Use case considered by Council</p> <p>Loan application includes all type of credit products (secured/unsecured, long term/short term, credit line, credit card, bills discounting, receivables financing, TReDS)</p>
<p>Data shared by Customers with FIUs - to generate insights that help customers manage their finances</p>	<p>Data shared by Customers with FIUs - To assess eligibility and make a loan offer</p>
<p>Ongoing service - Repeated access to dashboards and insights</p>	<p>One-time interaction - decision based (take or leave) - loan offer</p>
<p>Obligation on Customer: Information only service; service not binding on the customer</p>	<p>Obligation on Customer: Creates a loan obligation if accepted</p>
<p>Periodic access aligned to an continuous service provided to customer</p>	<p>One-time access for a specific loan application</p>
<p>Recurring consent reflecting continuous use</p>	<p>One-time consent tied to a single purpose for loan</p>
<p>Data cannot be used to offer credit, as customer has not shared the data for solicitation</p>	