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Privacy Commissioner
PO Box 10 094,
The Terrace
Wellington 6143

Dear Commissioner,

Credit Reporting Privacy Code Amendment No. 13 & No. 14

Thank you for the extended opportunity to comment on the proposed changes to the Credit Reporting Privacy Code.

The Privacy Foundation welcomes the latest round of proposed changes to the Code. We believe the proposals will usefully update this important piece of consumer protection regulation, in the light of current experience. The code usually receives little public attention and we congratulate the Commissioner and staff on carrying out a further round of the detailed work which we know is required to change and strengthen its protections. We note that the code is in some ways a ground breaker in the field of protecting consumers in an environment where machine decision making and algorithms are used, potentially disempowering consumers.

We believe the proposed changes are positive for consumers. We strongly support: the reduced time of 10 days in which access requests must be answered; simplifying a credit freeze application for consumers (one rather than 3 applications); reducing the payment period for urgent access requests from 5 to 3 days; improved access to credit scores; and reducing the impact that "credit shopping" will have on credit scores.

We also support the way the amendments deal with the risks of credit reporters by-passing the existing "no marketing use of credit information", and the requirement to unbundle consents for access requests.

Yours sincerely

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke extending to the right.

Gehan Gunasekara

Deputy Chair

Privacy Foundation New Zealand