

Consumer Data Right Policy and Engagement Branch
Market Conduct and Digital Division
Treasury
Langton Cres
Parkes ACT 2600

1 November 2023

By email: data@treasury.gov.au

To whom this may concern,

SCREEN-SCRAPING – POLICY AND REGULATORY IMPLICATIONS

As the peak body representing the mortgage and finance broking industry, the Mortgage & Finance Association of Australia (**MFAA**) welcomes the opportunity to respond to Treasury's discussion paper (**the Paper**) on the policy and regulatory implications regarding screen-scraping, also known as digital data capture.

As context to this submission, the MFAA is Australia's leading professional association for the mortgage and finance broking industry with over 14,500 members. Our members include mortgage and finance brokers, aggregators, lenders, mortgage managers, mortgage insurers and other suppliers to the mortgage and finance broking industry. Brokers play a critical role in intermediated lending, providing access to credit and promoting choice in both consumer and business finance. Brokers facilitate more than two thirds of all new residential home loans¹ and approximately four out of ten small business loans² in Australia.

1. INTRODUCTION

The MFAA's role, as an industry association, is to provide leadership and to represent its members' views. We do this through engagement with governments, financial regulators and other key stakeholders on issues that are important to our members and their customers. This includes advocating for balanced legislation, policy and regulation and encouraging policies that foster competition and improve access to credit products and credit assistance for all Australians.

The MFAA continues to support the expansion of the Consumer Data Right (**CDR**). We also note the Statutory Review into the Consumer Data Right Report (**the Report**) recommended a ban on screen-scraping.³ We welcome the Government's decision to regulate, rather than ban the practice of screen-scraping, and support an orderly transition between the two technologies.

¹ [MFAA Industry Intelligence Service Report 15th Edition](#) pg 4.

² Productivity Commission research paper [Small business access to finance: The evolving lending market](#) pg 44.

³ [Statutory Review of the Consumer Data Right Report](#) Recommendation 2.1 pg 12.

With any change in the way data is collected, particularly financial data, trust, privacy as well as data and cyber security remains front of mind for the mortgage and finance broking industry.

2. BACKGROUND

Mortgage and finance brokers rely on products utilising screen-scraping technology to collect information for the purposes of lending.⁴ Therefore, observations we make in this submission in relation to products that rely on screen-scraping technology are predominantly based on this use case.

Importantly and for context, mortgage brokers are required by law to comply with both responsible lending⁵ and best interest duty⁶ obligations. What this means is that mortgage brokers need to collect information about their customers for the purposes of assessing their customers' requirements, objectives, and financial position to both enable them to meet their regulatory obligations and to provide their customers with the most suitable loan which is in their best interest. For this reason, a key consideration for our industry is that the collection of that information from customers is as seamless, frictionless, and as thorough as it can possibly be. In essence, screen-scraping facilitates this process and is a key step for many mortgage and finance brokers to make reasonable inquiries to verify a customer's financial situation (i.e., income and expense information).⁷ As noted in ASIC Regulatory Guide 209 issued in 2019, use of screen-scraping is recognised as a suitable mechanism to achieve this result.

RG 209 specifically outlines the typical information that can be confirmed by way of screen-scraping and analysis to meet the verification requirements of a consumer's financial situation, noting that while security and privacy considerations are important, licensees should not consider these matters to necessarily be a barrier to obtaining information required to meet their responsible lending obligations.⁸

Use of screen-scraping in the mortgage and finance broking industry

The mortgage and finance broking industry relies significantly on screen-scraping products to meet responsible lending and other regulatory requirements.⁹

Both Bankstatements.com and Cashdeck, enables an emailed link to be sent to a customer which, once accessed allows that customer to use their login details specifically for the purposes of sharing bank statement information with their broker.

A recent survey of our broker members in relation to their use of screen-scraping products (Bankstatements.com and Cashdeck) indicated:

- 87% of respondents used these products, and of these respondents:
 - nearly 98% found them very useful,
 - 95% said they used these tools for verification of financial information obtained from the customer,
 - 71% used them to conduct servicing assessments,
 - 65% used them to support their customers with budgeting, and
 - 91% used them to meet the requirements placed by lenders on the home loan application and assessment process,

⁴ For example, illion has indicated that between 7,000 and 8,000 mortgage and finance brokers utilise its Bankstatements.com product, and that translates to on average 50, 000 customers of mortgage and finance broker customers accessing Bankstatements.com, on a monthly basis.

⁵ ASIC RG209: Credit licensing: Responsible lending conduct, RG 209.131 specifically notes that a credit provider may use verification tools such as digital data capture services to (with the consent of the consumer) check doubtful information provided by a consumer.

⁶ ASIC RG 273 Mortgage brokers: Best Interests Duty.

⁷ We refer to our member survey conducted in October 2023, a snapshot of results is at Attachment B.

⁸ ASIC RG 209 Credit licensing: Responsible lending conduct, Table 5, pg 47.

⁹ Brokers use screen-scraping products to obtain information from customers in order to conduct serviceability assessments, to complete preliminary assessments, to conduct verification of customers financial information and to provide customers with budgeting support.

- interestingly only 4% of broker customers were unwilling to use screen-scraping products when requested, with the predominant reasons for the reticence being concerns around scams, data security and privacy, and
- when asked of alternatives to using screen-scraping products should these no longer be available, 64% of respondents said they would have to collect information via email while 54% said they would use a secure portal.

The overall sentiment from survey respondents is that the availability of screen-scraping services makes the whole finance application process easier and less time consuming for brokers and more importantly for their customers. There was a genuine concern as to the willingness of customers to engage in refinancing activity if information sharing became more onerous and what the corresponding impacts on consumer choice and competition could be.

There was also a recognition of the CDR (and Open Banking) and the value it will provide as a replacement to screen-scraping; however, it was noted the transition would be made easier if both lenders and brokers accessed the same data set.

Pleasingly 96% of brokers noted their customers were willing to use screen-scraping products when requested by their broker. This highlights to us that most consumers are willing to utilise technology to provide access to their financial information if recommended to do so by a source that they trust. As CDR matures, the investment in broker training and discussions with their clients in and around providing consent will be pivotal in consumer uptake of CDR as an information sharing mechanism.

Further insights from our survey are at Attachment B.

What is needed for an effective and efficient transition

The MFAA strongly supports the CDR and was instrumental in securing the inclusion of mortgage brokers as trusted advisers within the CDR framework. In our view, the CDR will assist mortgage and finance brokers by facilitating greater data sharing and increasing access to more comprehensive information, thereby helping brokers, as trusted advisors, to assist consumers to meet their financial objectives while also supporting brokers' compliance with their regulatory obligations. In essence, CDR will eventually be a superior solution to screen-scraping in the way customer information is collected for lending purposes, the opportunity being to provide a comprehensive picture, and a single source of truth about a customer's financial position.

In saying that, our view is that the CDR framework still requires significant maturity before it can be an effective replacement for screen-scraping.

Products for mortgage brokers and licensees using CDR are in development by a number of market participants. Development and embedment of these products into the industry is currently in what we consider to be at the "test and trial" phase.

As we have noted in our previous meetings with Treasury, and in previous submissions, we consider there are five components to be realised for the use of CDR data to be embedded within the credit assistance process for mortgage broker customers. These include:

- improvements in the consent framework to facilitate a better customer experience (currently underway),
- improvements in data quality and integrity,
- expansion in terms of data coverage (i.e., including non-bank lending data sets which is also currently underway),
- product development leveraging CDR data, and
- integration of those products into systems used by the broker industry to facilitate lending.

We have set out in Attachment C what we consider to be the status of each of these elements in comparison to screen-scraping. Our response to the discussion questions is at Attachment A.

Closing Remarks

While the MFAA strongly supports the regulation of screen-scraping as a measure to mitigate the risks raised in the Discussion Paper, we encourage Treasury to ensure that industry has the opportunity to make an orderly transition from screen-scraping to CDR.

We extend our thanks to Treasury for the opportunity to provide this submission. We would be very pleased to meet with Treasury and present the results of our survey. If you wish to discuss this submission or require further information, please contact me at anja.pannek@mfaa.com.au or Naveen Ahluwalia at naveen.ahluwalia@mfaa.com.au.

Yours sincerely,



Anja Pannek
Chief Executive Officer
Mortgage & Finance Association of Australia

Attachment A - Responses to Questions

1) What screen-scraping practices are you aware of or involved in?

The MFAA represents more than 14,500 members, including aggregators, lenders, brokers and suppliers to the mortgage and finance broking industry.

Our members utilise products that rely on screen-scraping technology such as Cashdeck and Bankstatements.com to gather information from their customers to conduct a number of activities, including to conduct serviceability assessments, perform preliminary assessments, to verify information from customers and to provide budgeting support. Our members also rely on these products to meet lender requirements, for example to provide bank statements in support of mortgage applications. In essence our members rely on these products to meet their responsible lending and best interest duty obligations.

While we do not have a comprehensive industry view around reliance on screen-scraping across the industry, we understand take-up is significant:

- One aggregator member has reported that over 60% of its credit representatives across its network hold licenses to Bankstatements.com,
- million has indicated between 7,000 and 8,000 brokers hold licenses to Bankstatements.com with on average 50,000 broker customers per month accessing this product,
- 87% of broker respondents to our survey on this topic indicated that they used either Bankstatements.com or Cashdeck.

We are also aware of automated repricing tools in market that currently use a combination of screen-scraping and CDR. These products compare home loan product interest rates against other lenders and facilitate refinancing on behalf of the broker.

1(a) What is the scope and purpose of the data that is captured? Is the data that is captured only banking data, or does it include data from other sectors?

The data that is captured for the purposes of lending is bank transaction data. Currently brokers use several different sources of information to enable them to produce a preliminary assessment of their customer's lending capacity, and this includes through credit reports, through screen-scraping products and directly from the customer (for example requesting wage documentation). Where possible brokers prefer to minimise information requests directly from the customer. This is both to reduce friction for the consumer and to also ensure the source of information is independent and verified.

Screen-scraping enables consumers to consent to sharing banking data that is available to them in the online environment. For this reason, the use of screen-scraping products (such as Bankstatements.com and Cashdeck) for a once-off access to bank statement information provides brokers with an option to obtain information easily and conveniently about their customer and verify information provided by their customer for the purposes of making an application for credit.

Further to this, and importantly also, screen-scraping products provide digital copies of physical bank statements which is a requirement of some lenders for verification purposes.

We note that some industry participants (i.e., aggregators) have integrated these products into systems for brokers, while others make these readily available for use through their broker networks. In our view, these products have provided a streamlined customer experience and have enabled brokers to have better quality conversations with their customers.

1(b) What steps do consumers, screen-scraping service providers and businesses using screen-scraping take in the screen-scraping process? What information is provided to consumers through the process?

Generally, where a broker uses a screen-scraping product, the broker will arrange for an emailed link to a customer to authorise and initiate the connection to facilitate data collection. We understand that at various points of the customer engagement, consumers are both informed and are required to provide consent to allow screen-scraping products to access and capture their banking information.

1(c) When is the consumer's data accessed as a one-off, and when is longer-term or ongoing access obtained? Where ongoing access is in place, how are consumers made aware of this and can they cancel access at a later point?

We are not aware in relation to the use of screen-scraping products to collect information for lending purposes that there is a longer term or ongoing access. Products such as Bankstatements.com and Cashdeck, as we understand, are one-off access and for a single point in time data capture.

1(d) Do you use screen-scraping for purposes other than data collection (for example to undertake actions on behalf of a customer)?

We are not aware of action initiation for the collection of information for lending purposes use case.

2) Are there any other risks to consumers from sharing their login details through screen-scraping?

As noted above, with both Bankstatements.com and Cashdeck, an emailed link sent to a customer allows for their login details to be entered with a third-party provider to enable that provider (via a program) to log into that customer's bank account for the purposes of capturing and sharing that customer's bank transaction history information with the customer's broker. The transaction history shared can be both in a line item and in an aggregated or categorised form.

We are not aware of any security breaches with respect to screen-scraping products. We also note a similar statement made by ASIC representatives in the Senate Select Committee on Financial Technology and Regulatory Technology in February 2020 that the regulator "has seen no evidence to suggest" that screen-scraping technology has contributed to consumer loss.¹⁰

In our view screen-scraping provides a faster, more convenient, and potentially more secure solution than previous practices of data collection within industry such as emailing copies of bank statements. We are concerned that 64% of broker respondents to our survey indicated that absent of CDR as an effective replacement (or any other solution), should screen-scraping products be unavailable, they will be reliant on email to collect information from their customers.

We do however suggest that there are opportunities to mitigate perceived risks from sharing login details – these perceived risks include providers engaging in 'action initiation' activities without consent (known in the UK as the impersonation effect). We note that the *Treasury Laws Amendment (Consumer Data Right) Bill 2022* that is currently before the Senate seeks to introduce an action initiation framework.¹¹

¹⁰ See Select Committee on Financial Technology and Regulatory Technology [transcript](#) dated 27 February 2020, comments made by Mr Tim Gough.

¹¹ Treasury Laws Amendment (Consumer Data Right) Bill, Chapter 1, section 1.2.

In terms of contemplation of regulation of screen-scraping, we see there to be an opportunity to leverage the safeguards of the CDR action initiation framework to place similar regulatory requirements on action initiation with respect to screen-scraping.

3) Do you have any data, case studies, or further information about the risks of consumers sharing their login details through screen-scraping?

No.

4) Could you provide any examples of actions your organisation takes to prevent or block screen-scraping (if you hold the consumer's data, such as a bank), or when your company's use of screen-scraping has been blocked (if you provide screen-scraping services or you partner with a screen scraper to provide your services), and why?

Not applicable.

5) Could you provide any examples of how your organisation or entities you partner with manage the risks associated with screen-scraping?

Providers of screen-scraping products and services are required to comply with privacy and data security related legislation in Australia, as do their clients. These clients include aggregation businesses, many of which have either integrated products such as Bankstatements.com into aggregation platforms utilised by their broker networks or make those products available to their brokers through contractual arrangements. Our aggregator members have noted that, as with any other technology supplier, they undertake supplier due diligence on screen-scraping product suppliers including in relation to independent testing and audit by security experts.

6) Are there other proposed reforms or legal frameworks that relate to the use of screen-scraping?

Yes. The privacy legislation in effect regulates the use of information that is derived from screen-scraping. We note that the Privacy Act Review Discussion Paper specifically contemplated an extension of the Act to respond to particular practices including screen-scraping (noting that the Discussion Paper specifically cautioned regulation needs to be calibrated and appropriately targeted so as not to proscribe beneficial or legitimate practices).¹² We further note that in its Response to the Privacy Act Review, the Australian Government specifically noted that the implementation of proposals 12.1 and 12.2 of the Privacy Act Review (in relation to fair and reasonable personal information handling)¹³ will help protect individuals when their personal information is used in complex data processing activities that have emerged through technological advancement such as screen-scraping.

While we consider it unnecessary given the expansive remit of the Privacy Act, and the changes contemplated, should the Government consider introducing bespoke legislation to regulate the practice of screen-scraping, in our view this rightly sits within the Privacy Act. If the Government was mindful to introduce bespoke regulation, we consider a pragmatic approach would be to leverage the current CDR framework. An effective regulatory regime could include:

- leveraging the CDR accreditation framework to require screen-scraping providers to hold accreditation,

¹² See [Privacy Act Review Discussion Paper](#) page 97.

¹³ See [Privacy Act Review Report 2022](#) page 8.

- as noted above, explicitly prohibiting action-initiation for screen-scraping providers (this would include giving contextual meanings to critical terms if used, such as “authorisation”, or “access”, so that it can be clear what is permitted and what is not),¹⁴ and
- establishing a simple consent framework to ensure that customers are properly informed and are consenting to the use of screen-scraping technology.

7) Are there any other international developments that should be considered?

We have no comment.

8) What are your views on the comparability of screen-scraping and the CDR?

a) Can you provide examples of data that is being accessed through screen-scraping that cannot currently be accessed using the CDR or vice versa?

As we understand, information in bank statement form (i.e., eStatements) is only available through screen-scraping. As part of meeting the obligation to conduct reasonable inquiries into a consumer’s financial situation, CDR does not currently provide the transaction listings in the eStatement format that is required by many lenders to enable line-by-line-item verification to identify and check income and expenses.

Further to this, the other obvious and known difference is that screen-scraping allows for the collection of transaction data from non-bank lenders whereas it is likely to be some time before these datasets are included within the CDR framework. Improvements in Open Banking to include access to other account types, such as business accounts, will further improve the CDR datasets.

b) Are there particular restrictions related to data use and disclosure under the CDR that influence choices to continue using screen-scraping, or vice versa?

Further to our comments above, further considerations include:

- Downstream CDR data management requirements are complex and prohibitive - for example the requirement for an Accredited Data Recipient (**ADR**) to retain and isolate the data and insights on its systems separately from other data they may hold can prove challenging when lenders use several different sources of data in lending assessments,
- Lenders currently require verification information in eStatement format that is not available through CDR, and
- The definition of trusted advisor currently applies only to mortgage brokers. In the same way as mortgage brokers, finance brokers support and assist their customers to obtain access to a range of finance options including for example personal loans and vehicle finance however are not able to access the CDR framework.

c) Are there requirements in other regulatory frameworks that affect the viability of CDR as an alternative to screen-scraping?

Lenders interpret their responsible lending requirements contained within Chapter 3 of the *National Consumer Credit Protection Act 2009* to undertake reasonable verification of a customer’s financial information as to require eStatements to enable line-by-line-item verification. This interpretation is further encouraged through guidance in ASIC’s RG 209¹⁵ and in AFCA’s Draft Approach to Responsible Lending.¹⁶ CDR currently does not provide the transaction listings in bank statement format that is required by many lenders to enable line-by-

¹⁴ Liu, H, Two decades of laws and practice around screen-scraping in the common law world and its open banking watershed moment, Monash University, Australia, December 2020.

¹⁵ See RG 209 Example 27 page 42-43 for an example of where lenders will require bank statements to confirm income and outgoings for a broker originated loan.

¹⁶ See the example on page 16 and also commentary on page 18 of AFCA’s [Draft Approach to Responsible Lending](#).

line-item verification to identify and check income and expenses. Changes to lender process could be encouraged through an updated RG 209.

d) Can you provide suggestions on how the CDR framework could be adjusted so that it is a more viable alternative to screen-scraping?

As we noted above, there are five components to be realised for the use of CDR data to be a viable alternative to screen-scraping:

- improvements in the consent framework to facilitate a better customer experience (currently underway),
- improvements in data quality and integrity,
- expansion in terms of data coverage (i.e., including non-bank lending datasets which is also currently underway),
- product development leveraging CDR data, and
- integration of those products into systems used by the broker industry to facilitate lending.

See Attachment C for further information.

9) The Statutory Review recommended that screen-scraping should be banned in the near future in sectors where the CDR is a viable alternative.

a) How should the Government determine if the CDR is a viable alternative?

We consider that to properly inform itself as to whether CDR is a viable alternative, that the Government needs to continue deep and thorough engagement with the mortgage and finance broking industry. It is industry that will inform the Government as to whether it can meet its responsible lending and best interest duty obligations by relying solely on CDR.

b) What are your views on a ban on screen-scraping where the CDR is a viable alternative?

As noted earlier in our submission, timing will be important to succeed in a well-managed and seamless transition to CDR. The notion of a ban is redundant if CDR proves to be a better alternative to screen-scraping. Where CDR is a better alternative to screen-scraping, screen-scraping will become redundant technology.

c) What timeframe would be required for an industry transition away from screen-scraping and why?

As noted above, a transition is dependent on certain milestones being achieved, these being an improvement in customer experience to incentivise adoption, the expansion into further datasets, an improvement in data quality, further product development and integration of those product in data collection and verification processes.

Innovation and take up of CDR more broadly across the industry is in its early stages with early adopters supplementing CDR powered products with screen-scraping. However, and excitingly, the industry continues to make material inroads in piloting CDR use cases. CBA in October 2023 became one of the first lenders to enable Open Banking for mortgage brokers in NextGen's loan lodgement platform ApplyOnline.¹⁷ NextGen is the parent company to Frollo, an ADR, and the aim of this solution is to cut down application rework and reduce customer wait times for a credit decision. NextGen has also partnered with aggregator Finsure¹⁸ to provide its brokers with Open-Banking-powered financial snapshots of its customers to allow different participants in the process to rely on the one set of data (vs repeating the verification process by other means once an application is lodged).

¹⁷ [NextGen and CBA enable Open Banking for mortgage brokers - Frollo](#)

¹⁸ [Finsure Financial Passport - Frollo](#)

Timing will be important to succeed in a well-managed and seamless transition to CDR. The risks of going too early include:

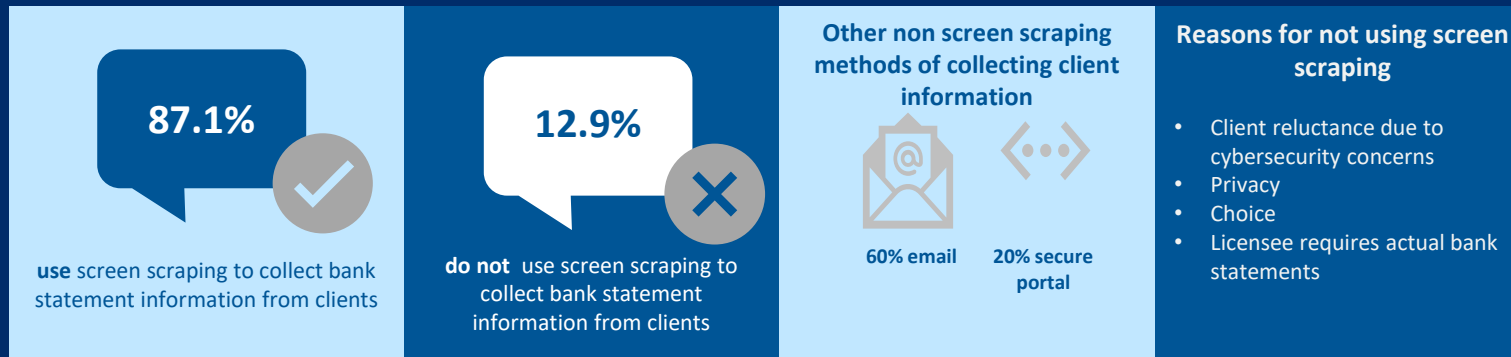
- introducing friction into the process and reducing the seamless experience consumers experience when screen-scraping is used and the impact on how our members will meet their regulatory obligations,
- increasing data security risk from a reversion to more manual processes, such as receiving customer transaction data (bank statements) in hard copy or by email, and
- the potential impact on credit quality that may result if lenders (to where applications for credit are made) are not able to receive good quality data.

Attachment B: MFAA Member Insights – Screen-scraping – October 2023



The MFAA Member Insights Survey heard from 101 broker members, asking about usage of screen-scraping (otherwise known as Digital Data Capture), in working with clients, their client's openness to the use of screen-scraping and other alternatives they would consider without screen-scraping options.

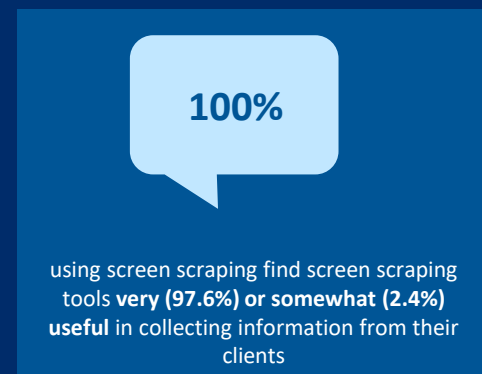
Usage



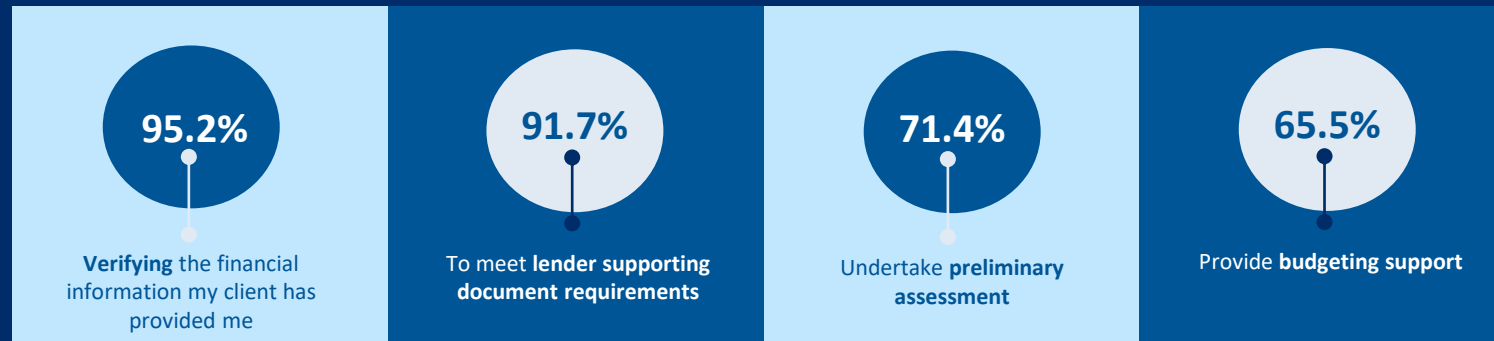
Member comment:

“Without it countless clients would not worry about refinancing their home loan due to the effort involved meaning they will stay paying higher rates.”

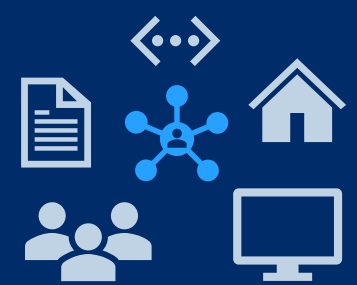
Respondents



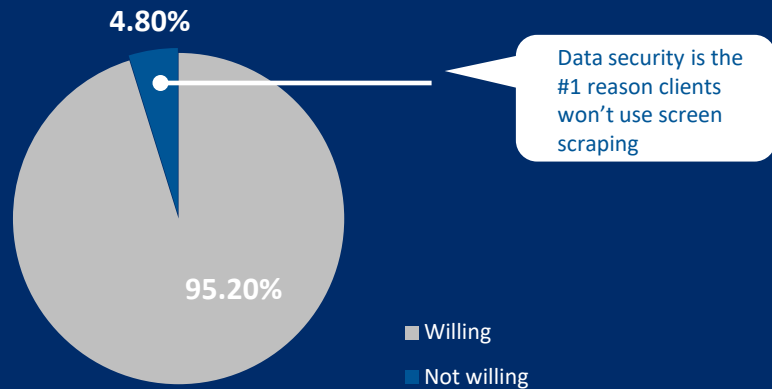
Main uses of screen-scraping



MFAA Member Insights – Screen-scraping – October 2023 (cont'd)



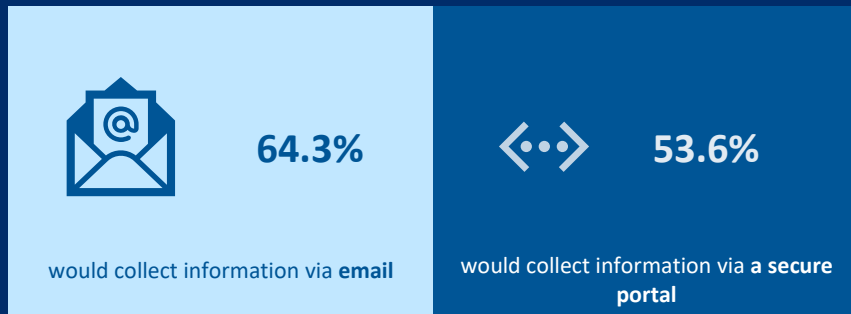
Client willingness to use screen scraping



Member comment:

"They ask if its safe. However, we find that clients find it very difficult to produce accurate statements with their correct name, account number and all the details lenders require from them. This makes the task extremely difficult for the client and sometimes frustrating, [so] they find the process easier to go direct to their bank as they don't have to provide statements or end up using a link for ease"

Alternatives if screen scraping was no longer available



Member comment:

"Using Bankstatements.com makes our customers experience simple and easy. We have not had any issues or complaints from any of our hundreds of customers who have used this to provide bank statements to us. It improves the accuracy of our assessment and ensures critical information is not missed - I believe it is not only time saving for both broker AND customer, it also safeguards both parties when doing credit assessments as we can accurately find any issues with expenditure, undisclosed loans etc are clearly identifiable. Also is a great budgeting tool for customers - helping them to refine their household budgets and clean up spending etc to put them in best position to save and purchase a home. The use of Bankstatements.com is an invaluable aspect of our brokerage for both brokers and customers. It would be of significant impact to our day-to-day business and inconvenience for our customers if this was no longer available."

Attachment C:

CDR v Screen scraping – Key considerations for consumers and mortgage brokers

- Fit for purpose
- Further consideration & development required
- Significant further development / maturity required

	Consumer Experience (CX)	Data Integrity	Data Security	Data Coverage	Product Development	Product Integration
Screen scraping	●	●	●	●	●	●
CDR	●	●	●	●	●	●
Screen scraping	<ul style="list-style-type: none"> One touch consent Seamless Disclosures contained in T&Cs 	<ul style="list-style-type: none"> Point in time capture facilitates data quality/integrity 	<ul style="list-style-type: none"> Screens-crapping requires the sharing of user authentication information with a third party Perception of data security issues (noting there is no known data breach from the use of screen-scraping) 	<ul style="list-style-type: none"> Majority of data required for a loan application readily accessible by a consumer (i.e. for most or all transaction and debt accounts a consumer has) 	<ul style="list-style-type: none"> Mature products available for brokers and lenders with features to meet lender information requirements and credit assessment processes, allowing for verification (ie bank statements) 	<ul style="list-style-type: none"> Products well integrated into aggregator systems allowing for ease in using data by consumers and brokers Self serve also available for consumers and brokers
CDR	<ul style="list-style-type: none"> Consumers needs to take a number of steps to access and consent to data sharing with their trusted adviser 	<ul style="list-style-type: none"> Confusion over optional fields has contributed to inconsistent data quality Some account types still not readily available from mandated data holders 	<ul style="list-style-type: none"> Regulated framework enhances trust in data security 	Data available only within standardized schema, currently does not include alternative finance lenders and other credit products	<ul style="list-style-type: none"> Products/service offerings are limited at present, with further development (in conjunction with data coverage and CX) required for broader take up in the broker industry 	<ul style="list-style-type: none"> CDR product integration still in infancy – products in testing phase
Broad based CDR adoption	<ul style="list-style-type: none"> Consent framework needs streamlining for better customer experience in CDR 	<ul style="list-style-type: none"> Datasets need to be consistently interpreted across all lenders to enable CDR to be scalable 	N/A	Data suites expanded to include alternative finance lenders and other credit products (Open Finance)	CDR products need to have similar or same features as screen-scraping products OR lenders need to accept CDR format and integrity	Integration into aggregator software that is expected to come with maturity