

## Premium Credit Limited

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Consumer Protection Policy  
Central Bank of Ireland  
PO Box 559  
Dublin 1

Dear Sirs

### **Discussion Paper: Consumer Protection Code and the Digitalisation of Financial Services**

Premium Credit Limited (PCL) welcomes the opportunity to comment on the Discussion Paper: Consumer Protection Code and the Digitalisation of Financial Services recently issued by the CBI.

By way of background, PCL is a leading insurance premium finance company in the UK and Ireland. Established in 1988, we specialise in providing finance for businesses and individuals allowing them to pay for their insurance by spreading the costs over regular instalments, instead of paying the whole premium upfront. In addition to insurance premiums, we also provide finance to pay annual fees such as professional fees and membership subscriptions. In Ireland, we are authorised by the Central Bank of Ireland as a Moneylender.

Whilst we note that the discussion paper intentionally does not address matters relating to digital onboarding or Anti-Money Laundering, we wish to make comments in relation to these areas in the context of digitalisation for the CBI's information and consideration. We believe that a number of the themes of, and questions in the paper in relation to digitalisation and customer journeys are linked to the AML framework and availability of both public and private record searches.

The current 2010 AML Regulations (s.33(2)(a)) do not appear to allow substantive innovation in the marketplace ("identifying the customer, and verifying the customer's identity on the basis of documents (whether or not in electronic form), or information, that the designated person has reasonable grounds to believe can be relied upon to confirm the identity of the customer, including; (i) documents from a government source (whether or not a State government source), or (ii) any prescribed class of documents, or any prescribed combination of classes of documents;"). One such area for policy development relates to the forthcoming Central Credit Register - data will be submitted to the register by regulated entities only on an ongoing basis which could present a confidence score for each customer (based on the amount of historic information and the ongoing credit history profile) to assist in the verification of a customer's identity and address. If this is compared to the UK market for instance, current legislation and regulation allows verification using information obtained from a reliable source which is independent of the customer (for instance, a credit reference agency) for such verifications to be completed.

Changes in the AML framework would allow a more streamlined customer journey and a seamless digital experience with reduced intervention and engagement – this could assist in other regulatory objectives through reduced inertia and improved competition by consumers.

We would welcome the opportunity to discuss this response and our experience.

Yours faithfully



Neil Lloyd  
Head of Compliance – UK & Ireland