

Industry Survey

The European Credit Information Landscape

**An analysis of a
survey of credit bureaus
in Europe**

Marc Rothemund
and Maria Gerhardt



commissioned by



European
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Research
Institute

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ECRI Industry Survey

Marc Rothemund
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February 2011

The European Credit Research Institute (ECRI) is a research institution based in Brussels. Established in 1999 for the study of banking and credit in Europe, ECRI focuses on institutional, economic and legal aspects related to retail finance and credit reporting. The institute provides expert analysis and academic research for a better understanding of the economic and social impact of credit. ECRI supports and funds independent academic research projects. The institute monitors markets and regulatory changes and looks at their impact nationally and internationally.

This report does not reflect the opinion of any institution or member associated with ECRI.

Established in Dublin in 1990, the Association of Consumer Credit Information Suppliers (ACCIS) is an international non-profit association under Belgian law bringing together 37 consumer credit reference agencies in 27 European countries and 4 associate members from all other continents. ACCIS' main role consists in representing, promoting, protecting and preserving the common interests of its members. This includes in particular the representation and advocacy of members' interests' vis-à-vis government agencies, the public and all other third parties and to inform its members about matters of concern to them, including information about practices of other members. It also tries to coordinate their mutual interests and to represent them in the world committee. ACCIS aims to create a legal climate in which its members can continue to offer and further develop their services both at home and in Europe.

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Preface

Credit referencing occurs in many countries of the world with a primary purpose of collecting and providing information to help lenders make better decisions. However, there are many different models ranging from highly comprehensive databases of wide ranging information in the most advanced markets; to more basic registers of unpaid debts in more recently created registers.

The objective in undertaking such a comprehensive survey in such a complex business is to support and inform the ACCIS Committee and members about our industry. In addition, it will also be used to advise regulators, the press and advisors about the credit bureau landscape across the EU.

One of the primary purposes of our trade body, ACCIS, is to represent our members in discussions and negotiations with regulators. ACCIS has a clear objective to support the most comprehensive model of data sharing on behalf of our members. Ideally, that model should include both negative and positive data, across all forms of credit from the secured mortgage to the unsecured consumer credit products and also utilities such as mobile and fixed phones as well as utilities such as energy and water. Whilst such a depth and breadth of data is a goal for many of our members there is no doubt that some are nearer than others. We can learn from each other and help to show both regulators and consumers groups that data sharing can be a winning model for consumers, lenders and the economy as a whole. The variations in data and the rules that cover it are significant with no two countries operating in the same way and, in some countries, different rules for the bureaux within it.

For ACCIS to effectively perform its function it is essential for both the trade body and the members to have a clear understanding of how the member credit bureaux in the association operate now; in terms of what data they collect and supply and the restrictions that govern what may be done with the data. Only then can we establish the challenge ahead.

This new survey is the first step in collecting a greater depth of data on the members of our association so that we can understand the gap and create arguments to support our case for greater data sharing. At the same time we needed to be sensitive to the fact that many of the members also compete with each other so we had to be discrete and protect the confidentiality of the information provided in the survey. For this reason ECRI were commissioned to analyse the responses and write the report. Many of the responses have been added together to protect confidentiality of our members.

Of course, the most comprehensive credit bureau in the world will not, alone, ensure that all loans are sought or provided responsibly; regulation is a key component of an effective credit market. However, in order to make the best decisions about lending, providers need to have the most comprehensive, reliable and accurate information on which to base their decision. The role of the credit bureau plays a critical part in the provision of that data and the most consistent, comprehensive and effective models actually help more people get access to credit rather than less, as is sometimes claimed.

We would like to thank all the ACCIS members who responded and helped us to put together this information. Over the coming months we will continue to analyse the responses and make further data available, preferably on a country by country basis, where possible, so that it can be used by all of us .

We would welcome your feedback and ideas and, of course, next year we will be planning a new survey to pick up on the areas where we feel more information is needed.

The Executive Committee of ACCIS

Description of the study and interpretation of data

This report is the evaluation of a survey that was conducted amongst all 37 members of the Association of Consumer Credit Information Suppliers (ACCIS) in March/April of 2010. Thirty members responded in total.

The questionnaire was designed to allow for a quantitative evaluation, and descriptive statistics were chosen as the method for the elaboration of this report.

The evaluation of the surveys brought several challenges, mostly due to the variety of answers stemming from different countries. With credit bureau activities fragmented along national lines and businesses first and foremost regulated by national law and provisions, difficulties arose concerning the interpretation of many answers in a European context. Certain country-specific terms were only applicable in the national context.

In an attempt to enhance data comparability at the European level, abstraction from national specificities was undertaken in some cases. While this – logically – leads to a certain loss of richness of the available data, it was necessary in order to come up with a readable report containing valuable key figures and indicators that can be used to describe the environment in which ACCIS members operate.

Further, it needs to be clearly stated that it was not our mandate to verify the correctness of responses given. While certain ('obviously necessary') changes were undertaken, the dataset may still include mistakes due to misinterpretation or incorrect translation of the questions asked. For instance, the titles of indicated laws and regulations as well as the names of public agencies and/or government departments have all been taken from the responses provided and not double-checked with official translations in the respective country. ECRI bears no responsibility for the correctness of the responses given.

In addition, many questionnaires were not fully completed and/or questions were only partly answered. Where deemed necessary, ECRI has contacted the credit bureaus in order to obtain missing answers and/or clarify certain issues. This, however, does not mean that the underlying data is complete, because outstanding answers and the lack of time and resources militated against a more in-depth inquiry.

We are, however, confident that the following report allows for some interesting insights and contains valuable information that sheds further light on the business of credit reporting in the countries in which ACCIS members operate.

The European Credit Research Institute

1. Market Overview

This chapter provides an overview of the characteristics of the major national institutions, which are members of ACCIS and are active in Europe's credit reporting markets. While both public registers (operated by Central banks or supervisory authorities) and private credit bureaus (CB)¹ operate in some European countries, this survey makes available information on private entities only – with the exception of the credit register held at the National Bank of Belgium as the only public member of ACCIS.

As indicated above, 30 of the current 37 ACCIS members provided ECRI with completed questionnaires, thus allowing for a meaningful evaluation of the membership survey (see *Table 1*).

Table 1. List of respondents

Country	Credit Bureau	Abbreviation used
Austria (AT)	Kreditschutzverband von 1870	KSV 1870
Belgium (BE)	Banque Nationale de Belgique	NBB
Croatia (HR)	Hrvatski registar obveza po kreditima d.o.o.	HROK
Czech Republic (CZ)	Czech Credit Bureau, a.s.	CCB
Denmark (DK)	Debitor Registret A/S Experian A/S	Debitor Experian (DK)
Finland (FI)	Suomen Asiakastieto Oy	Suomen
Germany (DE)	CEG Creditreform Consumer GmbH SCHUFA Holding AG	CEG Schufa
Great Britain (UK)	Callcredit Ltd. Equifax Ltd. Experian Ltd.	Callcredit Equifax Experian (UK)
Greece (GR)	Tiresias Bank Information Systems SA	Tiresias
Hungary (HU)	BISZ Central Credit Information Plc.	BISZ
Iceland (IS)	Creditinfo Group	Creditinfo
Italy (IT)	CRIF S.p.A. Consorzio per la Tutela del Credito Experian Information Services S.p.A.	CRIF CTC Experian (IT)
Netherlands (NL)	Stichting Bureau Krediet Registratie	BKR
Norway (NO)	Experian Norway	Experian (NO)
Poland (PL)	Biuro Informacji Kredytowej S.A. Krajowy Rejestr Długów Biuro Informacji Gospodarczej SA	BIK KRD
Romania (RO)	Biroul de Credit S.A.	BDC
Russia (RU)	National Bureau of Credit Histories	NBCH
Serbia (RS)	Kreditni Biro (Association of Serbian Banks)	ASB
Slovakia (SK)	Slovak Credit Bureau s.r.o	SCB
Slovenia (SL)	The Bank Association of Slovenia	Sisbon
Spain (SP)	Experian Bureau de crédito S.A.	Experian (SP)
Sweden (SE)	UC AB	UC
Turkey (TU)	Kredi Kayit Bürosu A.S.	KKB

The 30 respondents listed above operate in 23 countries and *Table 2* shows the official International Labour Office (ILO) population figures for 2008 for adults of 20 years and above, indicating a rough estimation of the population ACCIS members could potentially store data on.

Credit bureaus' data coverage in each country depends on a number of factors, such as the CB size, its market dominance, the regulatory environment as well as the credit bureaus'

¹ The term 'credit bureau' will be used to refer to both the private entities as well as the only public credit register covered in this survey, the National Bank of Belgium.

agreements with creditors. Coverage tends to be high especially in Western European countries, meaning that most consumer credit contracts and other types of loan contracts are saved in CB databases. Exact figures cannot be given for the time being, but work is currently being undertaken to come forward with representative and comparable figures.

A number of challenges arise for calculating and comparing data coverage figures on consumers across countries. First of all, the surveyed CBs do not necessarily collect information on the same populations across countries. While information is evidently registered on individuals who have gotten engaged in a credit contract, the borrowers' minimum age for committing to such agreements may vary across countries. Further differences may arise when taking official population statistics at the World Bank or International Labour Office for the calculation of the percentage coverage per country, as those institutions typically have their own population classifications, making it even more difficult to provide exact, comparable coverage indicators per country. A second challenge to the provision of coverage figures per country is that CBs register data for different products (consumer credit, mortgage loans, retail credit, etc.); absolute numbers are therefore not always comparable because different records may be covered. Further, CBs generally store information on non-national borrowers. Consequently, CB databases include individuals that would not appear in national population figures. Other reasons for the difficulty of providing exact coverage figures are very practical, such as an overestimation of the number of records due to existing entries of deceased persons or citizens with new ID numbers and the non-deletion of their old entries.

For these reasons, 100% of records for, say, retail credit, perhaps at negative level is not comparable to 100% of all types of credit at a positive level. Absolute figures are always a challenge as the data collection time point may differ as may the definition which can also create further "noise" in the statistics. However, suffice to say at this point that across the ACCIS membership data is collected and supplied, to a greater or lesser degree, on nearly 500m people.

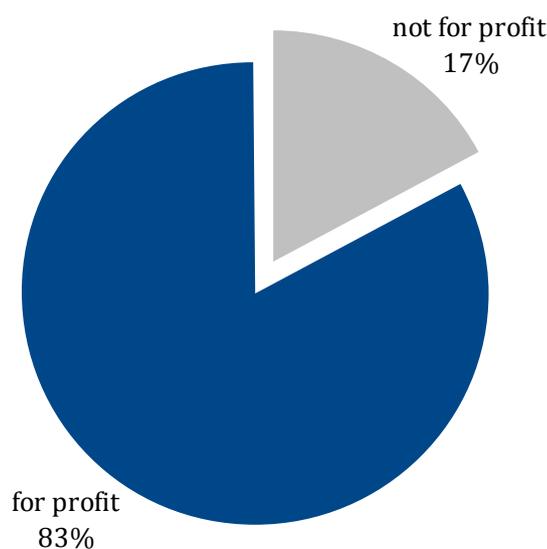
Table 2. Population coverage in countries with ACCIS respondent

Country	Population >20 years*
AT	6
BE	8
CZ	8
DE	67
DK	3
FI	4
GR	9
HR	3
HU	7
IS	0.2
IT	48
NL	12
NO	3
PL	29
RO	17
RS	6
RU	111
SE	7
SL	2
SK	4
SP	36
TU	45
UK	46
TOTAL	481.2

Source: Population numbers for 2008 extracted from the International Labour Office database on labour statistics. * Rounded to nearest million.

With only very few exceptions, the collection and redistribution of credit information in Europe is a for-profit business. The following chart shows that 17% of the surveyed credit bureaus offer their services on a non-profit basis, this being the case in Belgium, Italy, the Netherlands, Serbia and Slovenia. While reasoning is straightforward in the case of Belgium – with the credit bureau being operated by the central bank – bank-owned CTC (Italy) and Sisbon (Slovenia) are operating not-for-profit in contrast to credit bureaus with similar ownership structures in other countries. Twenty-four credit bureaus, including large international commercial listed companies such as Experian or Schufa Holding AG, operate for profit.

Figure 1. Credit reporting as a for-profit business



Source: Association of Consumer Credit Information Suppliers, ACCIS survey 2010

Since Belgium is one of the few countries with no private credit bureau(s)² the exchange of credit information in the country is being managed by the National Bank of Belgium operating its “Central Individual Credit Register”. The Belgian credit bureau thus distinguishes itself from the other ACCIS members by being the only partially state-owned entity.

This is illustrated in **Figure 2**, which gives a complete overview over the various types of ownership structures among the respondents of the membership survey.

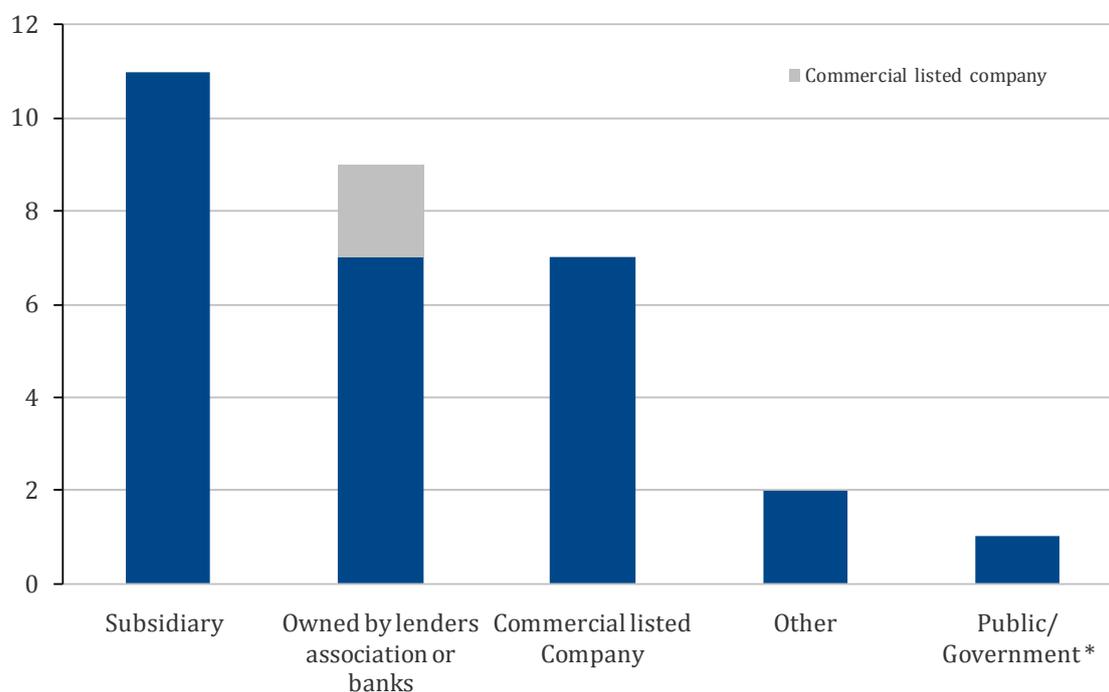
It also indicates that most credit bureaus operating in Europe are subsidiaries (11), i.e. are wholly or by majority owned by another company – this company in most cases being another credit bureau. Under this category, it is worth noting Experian (UK) running subsidiaries in Denmark, Italy, Norway and Spain and of the Czech Credit Bureau A.S. as well as the Slovak Credit Bureau, both of which are owned by the Italian company CRIF S.P.A. The latter is categorised as “other” since the majority is owned by private shareholders and management, with banks holding minority stakes in the company. The second example for the “other” category is the Austrian KSV 1870.

Two institutions in the category of commercial listed companies – Schufa Holding AG and the Russian NBCH – are owned by lenders associations or banks (shaded in grey in the

² A few databases – not credit bureaus – exist in Belgium and collect data on consumers’ payment behaviour, which may also be consulted by outside organisations, yet these databases do not operate on the same scale as private credit bureaus in other countries.

second column to illustrate double-counting). Lenders associations and/or banks are the owners of six further credit bureaus operating in Europe.

Figure 2. Ownership structure of European credit bureaus (# of CBs)



* The credit reference agency in Belgium is run by the National Bank of Belgium, which is 50% state-owned.
Source: Association of Consumer Credit Information Suppliers, ACCIS survey 2010

A joint analysis of both the founding year and the size of the local credit bureau (in terms of number of employees) seems to reveal a relationship between the two variables. Longer established and experienced companies employ a considerably larger workforce than newly founded institutions: for 82% of those credit bureaus founded before the 1990s, the staff size exceeds 100 employees (see **Table 3**). Big market players such as Schufa Holding AG, CRIF S.p.A., Experian and Equifax are good examples, but also the Austrian KSV 1870 or the Swedish UC AB. Here again, the National Bank of Belgium is an outlier – most probably due to the reliance on the common back office of the central bank as well as a far narrower scope of products offered (i.e. credit reports only).

On the other side of the spectrum are the young credit bureaus of smaller European countries, such as CCB (2001, CZ), BDC (2004, RO), ASB (2004, RS), HROK (2005, HR), NBCH (2005, RU) and Sisbon (2008, SL). 81% of the companies founded after the year 2000 (still) employ less than 50 people. The outlier in this case is the Polish KRD (>200) and the Norwegian offices of Experian (>150).

Such an analysis, however, does fall short of taking into account other factors such as country and market size, market maturity, ownership structure, regulatory environment, products supplied and/or type of data sharing.

Table 3. Founding year and size of credit bureaus

		Number of employees					Total	
		01-20	21-50	51-100	101-200	>200		
Founding year	before 1990	1	1	0	3	6	11	# of CBs
		9%	9%	0%	27%	55%		% of CBs
	1991-2000	0	2	1	3	1	7	# of CBs
		0%	29%	14%	43%	14%		% of CBs
	2001 - now	5	4	0	1	1	11	# of CBs
		45%	36%	0%	9%	9%		% of CBs

Source: Association of Consumer Credit Information Suppliers, ACCIS survey 2010

While the primary rationale behind the existence of credit bureaus is the facilitation of creditworthiness checks carried out by creditors on potential borrowers, many companies have diversified their product range over the years and provide additional services to their clients.

Unsurprisingly, all surveyed credit bureaus produce and distribute reports on the credit histories of the data subjects. The following **Table 4** indicates that 82% of the surveyed companies also offer bureau credit scores in order to support the background checks of their clients. Due to plans to offer scorecard development services at some credit bureaus in the near future, the number of institutions offering these services might rise from the current 65%.

Among the various consultancy services offered to their members by several credit bureaus (70%), advice on credit risk assessments is the most widely available additional service of European market players.

Table 4. Products and services provided by credit bureaus

Products and services offered to clients*	YES		NO	
	# of CBs	% of CBs	# of CBs	% of CBs
Credit reports / credit histories	30	100%	0	0%
Scoring / Bureau Scores	23	82%	5	18%
Consultancy	19	70%	8	30%
Scorecard development	17	65%	9	35%
Software provision	14	56%	11	44%
Fraud prevention	14	54%	12	46%
Identity check	12	50%	12	50%
Marketing Services	10	37%	17	63%
Check of current account	7	30%	16	70%
Debt Collection	2	8%	24	92%

* Information missing for those columns where the number does not add up to 30.

Source: Association of Consumer Credit Information Suppliers, ACCIS survey 2010

Cross-border credit reporting, however, is still in its infancy – despite ACCIS’ active encouragement of reciprocal exchange within the boundaries of the respective national regulatory frameworks. Bilateral agreements, the so-called Credit Bureau Data Exchange Agreements (CBDE-Contract) have been signed since the 1990s but currently only 12 of the surveyed 30 credit bureaus access credit data on a cross-border level. This, according to the respondents, is mainly due to a combination of ‘lack of demand’ (six responses) on the one side and ‘restrictive legislation’ (nine responses) on the other³.

³ Cross-border credit exchange agreements have been investigated and illustrated in the European Commission’s Report of the Expert Group on Credit Histories” (2009): http://ec.europa.eu/internal_market/consultations/docs/2009/credit_histories/egch_report_en.pdf

An overview of those credit bureaus engaging cross-border data exchange is given in *Figure 3*.

Figure 3. Formal cross-border data exchange agreements in Europe



Source: Association of Consumer Credit Information Suppliers, ACCIS survey 2010

2. Regulatory Framework

Both at the EU and national level, credit bureaus have to comply with various laws and regulations – ranging from ‘broader’ national laws on the protection of personal data and consumer protection and banking laws to specific credit reporting acts in some countries. In 2005, companies operating in Italy, for example, have signed up to a binding Code of Conduct, in addition to the privacy provision set out by the Italian Data Protection Code (Codice Della Privacy). **Table 5** gives an overview of both the principle regulator as well as principle national regulation for each of the countries covered by this survey.

Table 5. Overview of national regulators and principle regulation

Country	Principal national regulator	Principal national regulation
AT	Austrian Data Protection Commission	Austrian Data Protection Act (DSG 2000)
BE	- the Ministry of Finance (for the NBB) - the Ministry of Economic Affairs (for the credit register)	Loi centrale des crédits aux particuliers (10 August 2001)
CZ	Data Protection Office	- Personal Data Protection Act - Commercial Code
DE	Federal Data Protection Authority (Bundesbeauftragter für Datenschutz)	German Federal Data Protection Act (Bundesdatenschutzgesetz - BDSG)
DK	DataInspection	Personal Data Protection Act (Persondataloven)
FI	- Data Protection Ombudsman - Ministry of Justice	- Credit information act - Personal data act
GR	Data Protection Authority (DPA) and Parliament	- L. 2472/1997 - L. 3259/2004 as amended by L. 3746/2009 and by L. 3816/2010 - L.3869/2010 - DPA's decisions 24 and 25/2004
HR	<i>Not yet</i>	Croatian Act on Registries (in preparation by the Ministry of Finance)
HU	Parliament	Act CXII of 1996 on credit institutions and financial enterprises
IS	Data Protection Authority	Data Protection Authority
IT	Data Protection Authority	- Data Protection Code - Code of Conduct*
NL	Dutch Data Protection Authority	Personal Data Protection Act (Wbp)
NO	Data Protection Authority	Personal Data Act
PL	- Ministry of Economy - General Inspector for Personal Data Protection	- Banking Law (Act on the Access of Economic Information) - Personal Data Protection Act
RO	Data Protection Authority	- Law no. 677/2001 on personal data processing - Data Protection Authority Decision no. 105/2007 on personal data processing by the credit bureaus
RS	National Bank	Decision on the classification of balance sheet assets and off balance sheet items
RU	Federal Service on Financial Markets	Federal Service on Financial Markets
SE	- Justice Department - Data Protection Board	Credit Bureau Act
SL	Data Protection Office	Banking Law
SK	Data Protection Authority	- Personal Data Protection Act - Banking Act - Commercial Code
SP	Agencia Española de Protección de Datos	Ley Orgánica 15/1999, de 13 de diciembre, de protección de datos de carácter personal
TU	<i>n.a.</i>	<i>n.a.</i>
UK	Information Commissioner	- Data Protection Act 1998 - Representation of the People Act 2001

* “Code of conduct and professional practice applying to information systems managed by private entities with regard to consumer credit, reliability, and timeliness of payments”.

Source: Association of Consumer Credit Information Suppliers, ACCIS survey 2010

It is on the basis of these national laws implementing the EU Data Protection Directive 1995/46/EC⁴ and (in some cases) further regulation that data *can* be collected, shared, accessed by the data subject, and stored for foreseen periods of time. According to the responses given by the surveyed credit bureaus, in a minority of countries (see *Table 6*), however, the sharing of credit data is actually *an obligation*.

Table 6. Voluntary vs. required sharing of and access to credit data

Country	Is credit data sharing required by national regulation?		Do lenders have the obligation to consult credit reporting databases	
	YES	NO	YES	NO
AT		X		X
BE	X		X	
CZ		X		X
DE		X		X
DK		X		X
FI		X		X
GR	X*			X
HR		X		X
HU	X			X
IC		X		X
IT		X		X
NL	X		X	
NO		X	X	
PL		X		X
RO		X		X
RS	X		X	
RU		X		X
SE		X		X
SL	X			X
SK		X		X
SP		X		X
TU		X	X **	
UK		X		X
TOTAL	6	17	5	18

* For bad cheques

**For the issuance of credit cards

Source: Association of Consumer Credit Information Suppliers, ACCIS survey 2010

The table also shows that creditors in the majority of countries surveyed *may decide* to consult credit information databases in the process of assessing a (potential) borrower's creditworthiness, *but lenders are not (yet) legally required*. According to the responses from 19 out of the 23 surveyed countries (no responses from four countries), this is not bound to change with the implementation of the new Consumer Credit Directive 2008/48/EC⁵.

2.1 The stance of and interaction with consumer groups

In the past, concerns were often raised by consumer representative regarding both the collection and sharing of credit data in general and the suitability of past payment behaviour as an accurate reflection of a borrower's current financial situation. The lack of transparency concerning third-party data access, potentially unclear ways of access to

⁴ Official Journal L 281, 23.11.1995, pp. 31–50.

⁵ Official Journal L 133, 22.5.2008, pp. 66–92.

own data for reasons of rectification and updating of old information, as well as the difficulty of proper risk assessments due to non-harmonized definitions, were identified as some of the main privacy and consumer protection concerns by the EGCH – whose report was eventually not endorsed by the three participating consumer representatives.

In a cross-country comparison, national consumer groups seem to be divided as regards their position towards the sharing of credit data. The survey suggests that in eight of the 23 countries covered, consumer groups support the exchange of personal credit information, while concerns are voiced in nine countries – stated reasons being general data protection and privacy considerations. A divided opinion seems to exist in four countries surveyed.

Regular contact and/or cooperation between consumer groups and credit bureaus could be seen as a way forward to alleviate existing concerns and work towards the efficient functioning of the market for credit data. The provision of clear information as regards the functioning of a credit reference agency (stored data, retention periods, methods of accessing and/or correcting own data, etc.) to consumer groups could support the latter in advising consumers and make the conditions of credit data exchange more transparent. Interestingly enough, just little more than 50% of the credit bureaus surveyed maintain regular contact with consumers’ representatives while the remainder is (so far) not engaging in such interaction. **Table 7** summarises these findings.

Table 7. Consumer support of data sharing (# of CBs)

	YES	NO	divided
Do consumer groups support the sharing of credit data?*	8	9	4
<i>of which negative information only</i>	1	---	1
Does your credit bureau have regular contact with consumer groups? **	15	14	---

* Out of 23 surveyed countries. No information available for two countries.

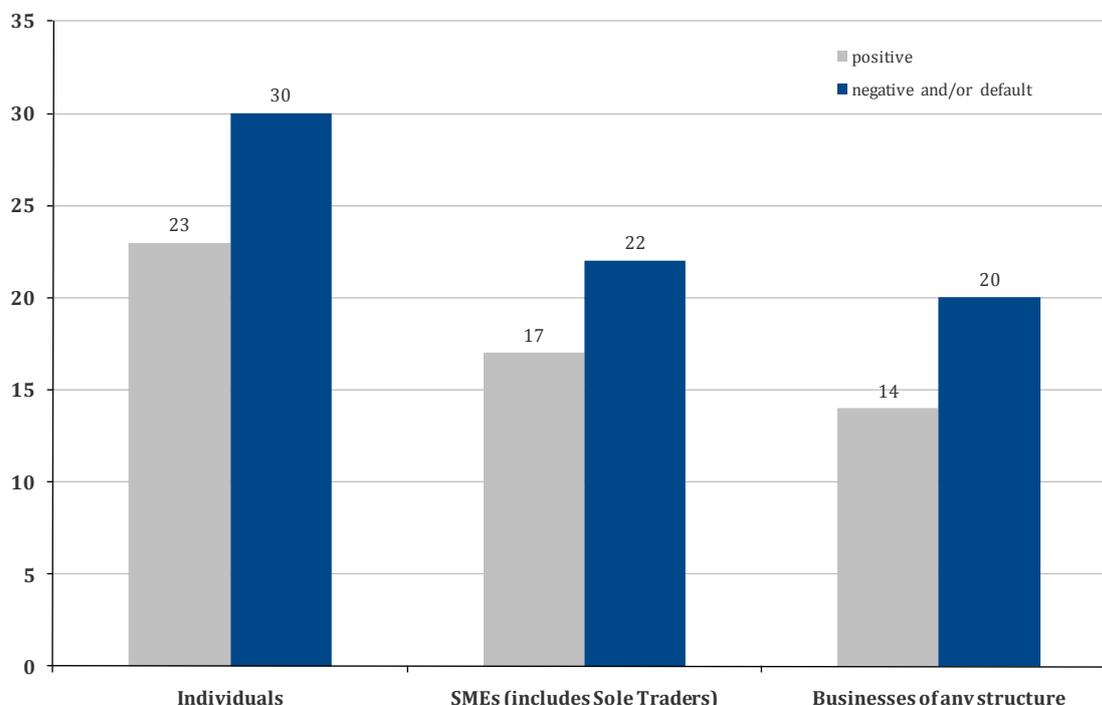
** Out of 30 surveyed credit bureaus. No information available for one credit bureau.

Source: Association of Consumer Credit Information Suppliers, ACCIS survey 2010

3. Data collection

As the collection and sharing of negative data on debtors constitutes the basic activity of consumer credit bureaus, all 30 respondents in the 23 surveyed countries confirmed that they store negative data on individuals. In 17 countries (22 CBs) negative information is kept on SMEs and in 16 countries (20 CBs) on businesses of any structure.

Figure 4. Storage of positive and negative data (# of CBs)



Source: Association of Consumer Credit Information Suppliers, ACCIS survey 2010

Positive data is collected in fewer countries: credit reference agencies from 18 nations stated that they save positive entries for consumers (see *Table 8*), in 14 countries for SMEs and 11 for any types of businesses. This difference is mostly due to varying regulatory structures: a more stringent legislative framework in several countries implies restricted possibilities to store positive information.

Table 8. Storage of positive and negative data on individuals per country

Country	On individuals		On SMEs			On businesses of any structure		
	Positive & negative	Negative only	Positive & negative	Negative only	No data collected	Positive & negative	Negative only	No data collected
AT	X		X					X
BE	X				X			X
CZ	X		X			X		
DE	X		X				X	
DK		X		X			X	
FI		X		X			X	
GR	X		X				X	
HR	X				X			X
HU	X		X			X		
IS		X	X			X		
IT	X		X			X		
NL	X				X			X
NO		X	X			X		

PL	x		x			x		
RO	x				x			x
RS	x		x			x		
RU	x		x			x		
SE	x		x			x		
SL	x				x			x
SK	x				x			x
SP		x		x			x	
TU	x		x			x		
UK	x		x			x		
TOTAL	18	5	14	3	6	11	5	7

Source: Association of Consumer Credit Information Suppliers, ACCIS survey 2010

Yet before data on individuals can actually be collected by the credit bureaus, consent by the data subject may – in one form or another – be required. This consent may take the form of explicit informed consent, unambiguous informed consent, consent/notification in the (credit contract's) general terms and conditions or through a specific agreement signed by the data subject.

The survey results indicate that the collection of negative data can be conducted without any form of consent by the data subject in approximately 50% of the countries covered: in 11 of the 21 countries that answered to this question, no consent is required. Note, however, that this does not exclude the fact that consumers may (have to) be informed about the data processing.

On the other side, however, the collection of positive information requires the data subject's consent in 75% of cases. In addition to the fact that the collection of positive data may not be allowed in a given country, no consent of any form was necessary in five countries, versus 15 countries indicating the need to obtain consent prior to the collection of positive information.

3.1 Type of data collected

As mentioned in the preceding section, all surveyed credit bureaus store negative data on individuals and three quarters of them also positive data. The registered data can be regrouped by the type of data, such as: consumer data, credit application data, legal information or loan data.

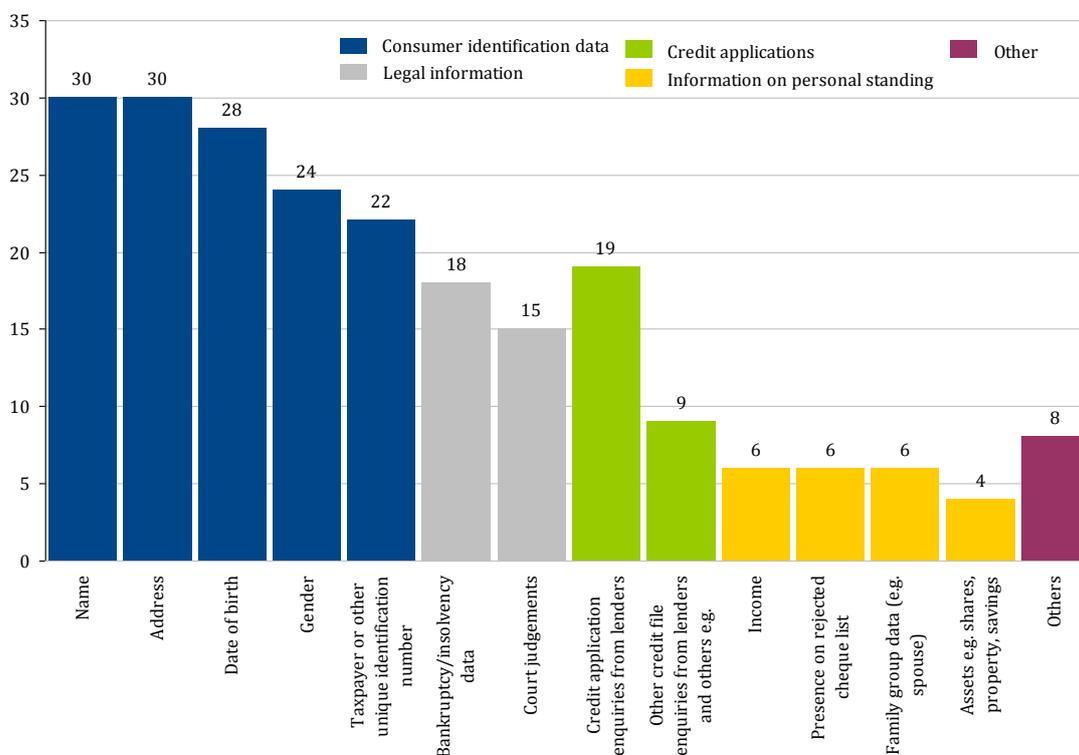
General **consumer data** helps to identify the individual. The 'name' and 'address' are registered by all 30 CBs that responded to the questionnaire, 'date of birth' by 28 out of the 30 respondents, 'gender' by 24 and 'identification number' or 'tax number' by 22 credit bureaus.

Information on the **credit applications** is available in two thirds of the cases: 19 CBs register enquiries from lenders and nine also other requests, for instance for the identification of cheques. Six respondents save information on the consumers' presence on a rejected cheque list. Eight bureaus also collect 'other' data, such as credit stoppage, enquiries by customers for own credit reports, other bureaus' negative data, and business phone file for identification checks, etc.

Legal information on 'bankruptcy' and 'court judgements' is only followed up on by slightly more than half of the respondents, namely 18 and 15 credit bureaus respectively. This might appear to be surprising, since in some member states this information is available for free at regional or national registers. Some further investigation as to why some countries do not do this would be helpful in order to establish, for example, whether there are legal restrictions.

Only a few respondents stated gathering personal information on ‘income’ (6 CBs), ‘family groups’ (5) and ‘assets’ (4). See *Figure 5* for an overview.

Figure 5. Data stored on the consumer (# of CBs)

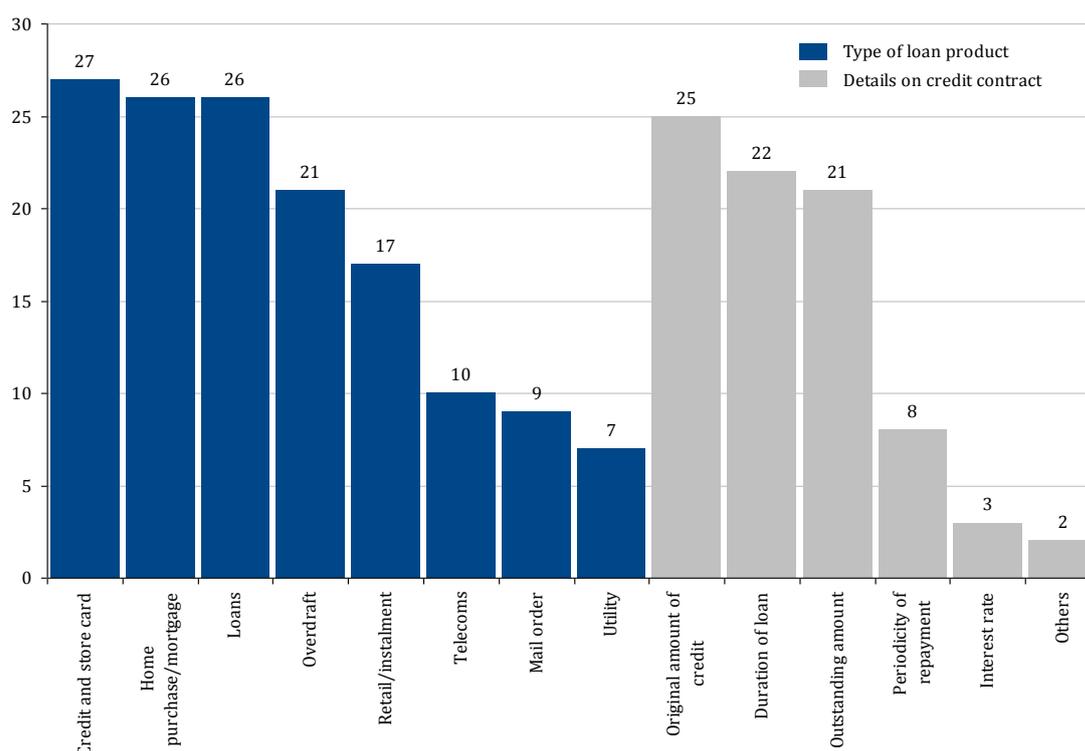


Source: Association of Consumer Credit Information Suppliers, ACCIS survey 2010

Information on what type of **loan data** is stored in the credit bureau was provided by 27 out of the 30 respondents. *Figure 6* shows that 26 bureaus indicated that they save information on ‘loans’, 26 on ‘home purchases/mortgages’ and all 27 on ‘credit and store cards’. The majority also register ‘overdrafts’ (21 CBs) and ‘retail credit’ (17). Much less keep track of ‘telecoms’ (10), ‘mail orders’ (9) and ‘utilities’ (7).

In addition to the types of credit, most bureaus also retain information on other loan details, such as the original amount of credit (25 CBs), the duration (22) and the outstanding amount (21). Few registers keep information on the periodicity of repayment (8) and interest rate (3). Two bureaus collect ‘other’ data on the type of payment and account relationship. A country-level breakdown can be found in Annex 1.

Figure 6. Loan data stored (# of CBs)



Source: Association of Consumer Credit Information Suppliers, ACCIS survey 2010

Regarding **payment data**, almost all credit bureaus (29 out of 30) store information on defaults. In 24 cases it is collected from the client, in four cases it is gathered from public sources and in one case from the consumer in addition to the public source. Three credit reference agencies did not indicate the source of the information. Out of these 29 CBs retaining data on defaults, 26 specified the 'default' classification (see Table 9): most of them (21) apply definitions of failed payments in terms of days. One credit bureau does not have a precise definition, but classifies according to months in arrears until the credit contract is terminated, when the case is transferred to non-performing loans. In another country, positive and negative data are being regularly updated hence all performing and non-performing credit records are covered in the database.

Table 9. Definitions of default (# of CBs)

Default definition	# of CBs*
by days:	21
<i>of which</i>	
<i>up to 30 days</i>	5
<i>30-59 days</i>	4
<i>60-89 days</i>	4
<i>at least 90 days</i>	8
"depends on client"	2
"depends on reminders/default notes"	2
Regular update of database	1

* No information available on 3 countries

Source: Association of Consumer Credit Information Suppliers, ACCIS survey 2010

What is remarkable in these results is that the majority of CBs apply a definition of default of less than 90 days. In many national and international statistical guidelines, the term

'default' is often used interchangeably with 'non-performing' or 'doubtful loans' and is generally specified as 'at least 90 days past due'. Out of the 26 replies, eight seem to apply this 90-day criterion; the others start storing such information much earlier, as can be seen in the table above. If one was to compare aggregate 'default' data from different credit bureaus at European level, the different classifications are likely to pose a challenge.

Other payment data that is stored includes on-time payments, which is kept track of by half of the respondents (16 CBs). 16 credit bureaus also save details of missed payments and eleven for the number of days overdue.

Table 10 shows that operators of a credit information database in all 23 countries are also obliged to keep a track record of 'footprints', i.e. information on the fact that the credit file has been accessed – usually recording both the party or institution accessing the file in addition to the date and purpose. It appears permission to use footprints in the decision making process may vary according to the type of data collected and shared by a single CB.

Table 10. The collection and use of footprints (# of CBs)

Country	Obligation of keeping a record each time a file is accessed?		Allowed to use footprints itself in the decision making process?		Do you keep different types of footprints?	
	YES	NO	YES	NO	YES	NO
AT	1		1			1
BE	1			1	1	
CZ	1		1		1	
DE	2		2		2	
DK	2		2		2	
FI	1		n.a.		1	
GR	1		1			1
HR	1			1	1	
HU	1			1		1
IS	1		1		1	
IT	3		1	1	3	
NL	1		1			1
NO	1			1	1	
PL	2		1	1	1	1
RO	1		1			1
RS	1		1		1	
RU	1		1		1	
SE	1		1		1	
SI	1		1		1	
SK	1		1		1	
SP	1		0	1		1
TU	1		1		1	
UK	1		3		3	
Total	30	0	21	7	23	7

Source: Association of Consumer Credit Information Suppliers, ACCIS survey 2010

3.2 Source of data

The source of data can either be the client, a public register or the consumer himself. In most cases, however, it is the client or a public source as data only rarely stems from consumers themselves, although they are sometimes drawn on as an additional source of identification data such as name, address, gender, date of birth or ID. These data are

mostly gathered from clients, but also partly from public sources. For legal information, public sources are mainly consulted, as can be seen in *Table 11* below.

Table 11. Source of personal data (# of CBs)

	Name	Address	Date of birth	Gender	ID/tax ID	Bankruptcy	Court judgem.
Client	27	27	23	18	19	5	3
Public source	11	11	9	8	6	15	13
Consumer	4	4	3	3	3	0	0

Source: Association of Consumer Credit Information Suppliers, ACCIS survey 2010

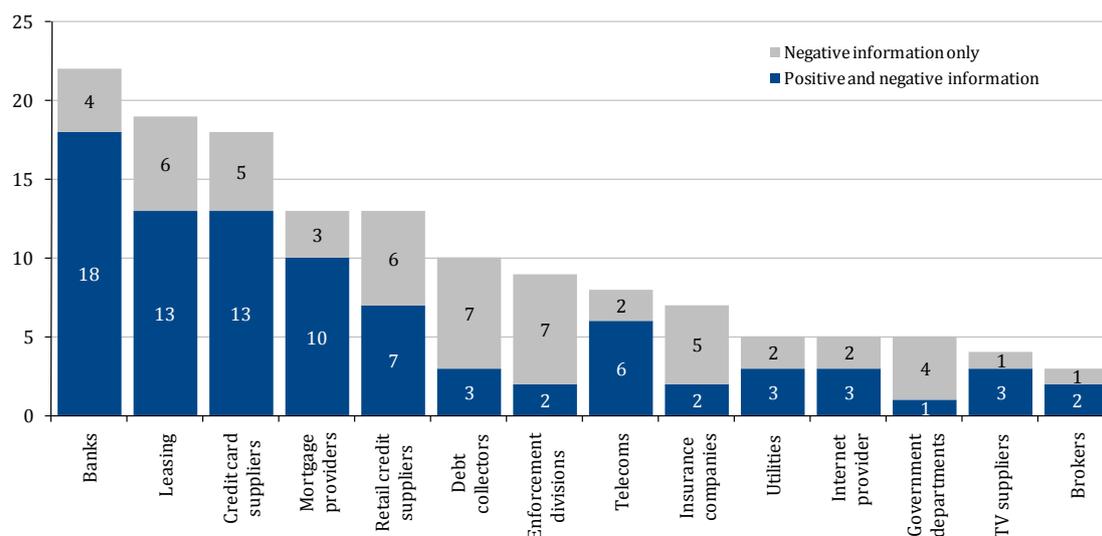
For loan as well as payment data, the responses have shown that across countries the loan service providers (the clients) are the principal source of information.

On the 'client' side, 14 groups of users have been identified: banks (including public, private, postal and cooperative banks and credit unions), leasing companies, credit card suppliers, mortgage providers, retail credit suppliers, insurance companies, debt collectors, 'enforcement divisions' (courts, tax authorities and the police), government departments, telecommunication companies, internet providers, television suppliers, utilities (electricity, gas and other fuel), brokers.

Delivering data in 22 of the 23 surveyed countries, banks are the principal data source for credit bureaus. They are followed by leasing companies as the second most important source of data on consumers' credit situation, sharing data with credit reference agencies in 19 countries. Mortgage providers supply data in 13 countries, enforcement agencies in eleven and debt collectors in ten. As can be seen from the below *Figure 7*, telecommunication firms, insurance companies and utility firms appear to be less relevant as a source of consumer data.

The figure also shows that positive data is typically provided by firms in the private sector – that is where the consumer takes out a credit contract – while the public sector and debt collectors typically provide negative data only.

Figure 7. User groups providing credit information data (# of countries)



Source: Association of Consumer Credit Information Suppliers, ACCIS survey 2010

With banks being the principal data source for credit bureaus, a more detailed look at which types of bank provide the information is worthwhile. *Table 12* provides an overview.

Table 12. Banks as principal source of data (# of countries)

	Number of countries, where CB collect information from banks				
	<i>Public banks</i>	<i>Private banks</i>	<i>Post banks</i>	<i>Cooperative banks</i>	<i>Other</i>
	18	22	14	15	6
	Distribution of positive/negative/default data				
	<i>Public banks</i>	<i>Private banks</i>	<i>Post banks</i>	<i>Cooperative banks</i>	<i>Other</i>
Negative	17	21	13	14	6
Default	14	18	11	12	3
Positive	14	18	12	13	4

* Note: Not all types of banks may exist in all countries. Also, even if such a variety is active in a certain country, not all types of banks may deliver data to the CBs.

Source: Association of Consumer Credit Information Suppliers, ACCIS survey 2010

3.3 Reporting thresholds

In several countries, credit bureaus decide to set thresholds below which credit contracts or non-performing loans are not being registered. For consumer loans, those thresholds are typically very low; in many countries CBs do not apply any minimum amounts for reporting at all. While different credit bureaus in the same country may set their own thresholds, the below table indicates the minimum amounts for positive/negative data in each country.

Table 13. Threshold for data collection on consumers

Country and credit bureau	Threshold	
	<i>In Euro</i>	<i>In local currency</i>
AT	300	300
BE	<i>No threshold</i>	
CZ	<i>No threshold</i>	
DE	100	100
DK	134	1000
GR	<i>No threshold</i>	
HR	<i>No threshold</i>	
HU	<i>No threshold</i>	
IS	235	40000
IT	<i>No threshold</i>	
PL	<i>No threshold</i>	
RO	<i>No threshold</i>	
RS	<i>No threshold</i>	
RU	<i>No threshold</i>	
SE	<i>No threshold</i>	
SI	<i>No threshold</i>	
SP	60	60
UK	<i>No threshold</i>	

Notes: Exchange rates as of 30/04/2010. No currency was indicated for DK and the UK; those amounts are assumed to have been stated in the respective local currency.

Source: Association of Consumer Credit Information Suppliers, ACCIS survey 2010

3.4 Data retention periods

The European Commission's Expert Group on Credit Histories (EGCH) has identified the existing variations in retention periods as one of the potential obstacles to cross-border credit reporting and states that "standardisation of definitions, thresholds, types of credit reported, retention periods, and update frequency would be the ideal". To that end, one of the group's recommendations is to seek "some degree of convergence of the content of the databases", in particular referring to the time periods that different data items are being kept in the records of the credit bureau.

A variety of current differences can be detected in an international comparison: While footprints (see **Table 10** for more information) in the Netherlands are retained for three weeks, for example, such information remains available in Spain for six months, in Belgium for three years and in Russia for 15 years. Differences are less pronounced yet existent concerning data on closed credit accounts: Information on credit accounts "closed good" can be obtained by credit bureau clients until three months after closure in Belgium and until six years after closure in the UK and 15 years in Russia.

Table 14 gives an example of national diversities by providing an overview of retention periods of default data, where differences are less pronounced due to a 'minimum' storage time of 3 years (Germany). While information on subsequently settled defaults is generally kept for less or the same amount of months in a great majority of countries, it is interesting to point out that such data can legally not be stored in Denmark and Spain.

Table 14. Retention periods of stored information in credit bureau databases (in months)

Country	Defaults	Defaults then settled
AT	60	84
BE	120	12
CZ	48	48
DE	36 - 48	36 - 48
DK	24-60	0
FI	24-48	24-36
GR	120	60
HR	<i>n.a.</i>	<i>n.a.</i>
HU	<i>n.a.</i>	60
IS	<i>n.a.</i>	<i>n.a.</i>
IT	36	12-36
NL	ongoing	60
NO	48	<i>n.a.</i>
PL	<i>n.a.</i>	<i>n.a.</i>
RO	48	48
RS	<i>n.a.</i>	<i>n.a.</i>
RU	180	180
SE	36	36
SL	48	48
SK	60	60
SP	72	0
TU	60	60
UK	72	72

Source: Association of Consumer Credit Information Suppliers, ACCIS survey 2010

3.5 Data quality and update periods

The quality of data is evidently of major importance to any credit bureau activity. The value of information, and therefore also the credit information business, stands and falls

with its quality and credibility. Credit bureaus in ten countries have declared that their data is subject to an independent inspection for quality purposes. Internal controls and clear data requirements exist in all countries to manage data quality.

In addition to those internal checks, credit bureaus in all surveyed countries follow up on consumer complaints to improve the accuracy of information. Other measures applied to assure high data quality are the consideration of data protection/regulator complaints (22 countries), checks when new data is being received (21), as well as crosschecks with other data files (17).

In ten countries, credit bureaus have stated that they comply with special reporting standards, mostly the ISO9001 for “Quality Management Systems”, ISO 17799 and ISO27002 for “Information Technology, Security Techniques and Code of practice for information security management”, ISO27000 and ISO27001 for “Information Technology, Security Techniques and Information Security Management Systems” or internal guidelines, such as the “Experian's Global Security Policy and Standards”.

To guarantee good quality of data, maintenance and regular updates are necessary. In the majority of countries, data provided by the credit industry is updated on a daily or weekly basis (see *Table 15*). Some countries apply a system of daily/weekly/monthly checks. In five countries, industry supplied data is only updated on a monthly basis. In case CBs also register public data, daily and/or weekly checks for new data are carried out in all countries, a few also have monthly updates.

Table 15. Update periods for credit records

Country	Credit industry supplied			Publicly supplied records		
	daily	weekly	monthly	daily	weekly	monthly
AT	x			x		
BE	x			x		
CZ	x		x			
DE	x	x	x		x	x
DK	x			x	x	
FI	x			x		
GR			x	x	x	x
HR			x			
HU	x					
IS	x			x		
IT	x	x	x	x	x	x
NL			x			
NO	n.a.			x		
PL			x			x
RO	x					
RS	x					
RU	x			x		
SE	x			x		
SL	x					
SK	x					
SP		x				x
TU			x			
UK			x	x	x	
TOTAL	15	3	9	10	5	5

Source: Association of Consumer Credit Information Suppliers, ACCIS survey 2010

4. Access to data

4.1 Credit report supply and demand

The number of credit reports supplied to CB clients and consumers varies considerably across countries, depending on many factors such as the size of the credit bureau, the information stored and/or the lending activity on markets. At the same time, the product offer of each credit bureau also plays a role in the number of reports supplied.

In addition, some credit bureaus offer 'flat rate' subscription to both clients and consumers, allowing them to access files on an unlimited basis. In those cases, files might be accessed much more frequently than if the client/consumer was charged a fee each time a report is requested.

Not every credit bureau responded to the question and some of those who provided figures did so only under confidentiality in order to allow for the calculation of aggregate numbers. The table below indicates the figures for consumer credit files provided to clients as well as the requests of consumers for their own file, indicating that at the European level, this amounts to nearly 850 million files supplied to clients and 13 million requests by consumers for the year 2009.

Table 16. Credit files supplied to clients and requests for own file (during 2009)*

	Number of consumer credit files supplied to clients	Number of consumer requests for own file
TOTAL	842.1	12.9

* In millions. Figures include flat rate subscriptions and portfolio monitoring.

Source: Association of Consumer Credit Information Suppliers, ACCIS survey 2010

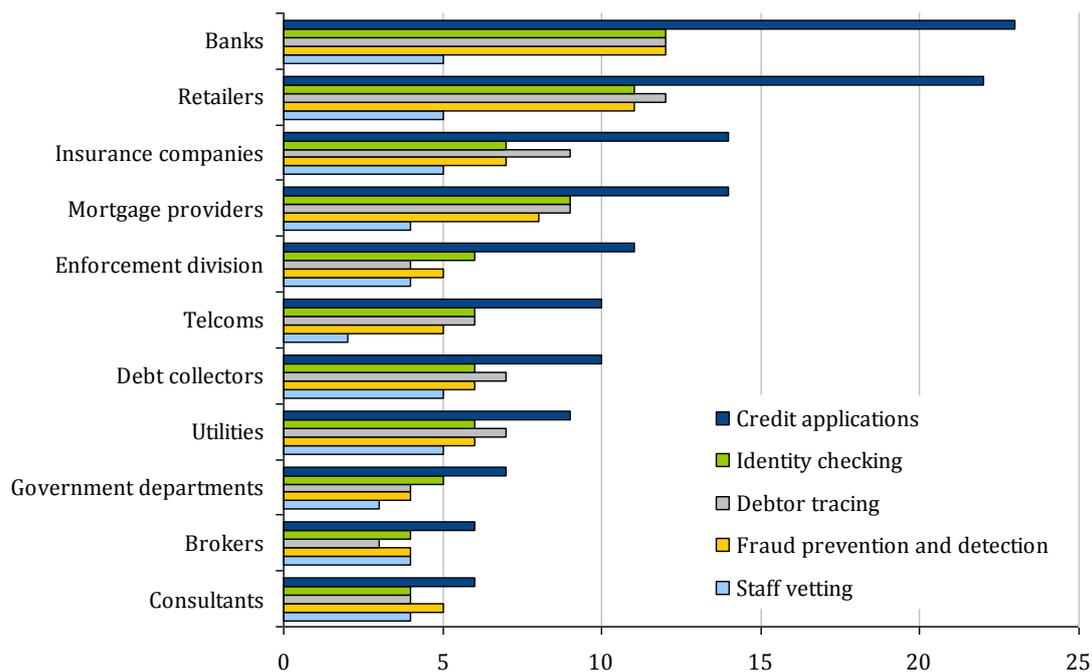
4.2 Data access for user groups

Credit bureaus store information that is exceptionally important for the conduct of business of many organisations. Depending on the type of business/activity, the different user groups⁶ may obtain full, restricted or no access at all to certain data. As mentioned above, eleven groups of users have been identified. In this section we will provide a brief overview of which clients gain access to consumer data for the following five purposes: credit application, identity checking, debtor tracing, fraud prevention and detection and staff vetting. More detailed information can be found in the Annex.

For consumers' credit applications, credit bureaus in all 23 countries permit banks to retrieve data on the person and in 22 countries retailers are also permitted to do so. In far fewer countries, credit bureaus provide access to mortgage providers and insurance companies (14 out of the 23 surveyed countries), enforcement division (11), debt collectors and telecoms (10), utilities (9), government departments (7), consultants and brokers (6). *Figure 8* shows the number of countries in which a certain type of client is granted access to data for credit applications, identity checking, debtor tracing, fraud prevention and staff vetting.

⁶ User groups encompass clients, such as credit providers and other market players, as well as non-clients, for instance courts or government departments.

Figure 8. Access to various data items by type of client



Notes: 'Banks' includes public, private, postal and cooperative banks and credit unions; 'retailers' covers retail credit suppliers, leasing companies and credit card suppliers; 'enforcement divisions' takes account of courts, tax authorities and the police; 'telcoms' implies phone services, internet providers and TV suppliers; and 'utilities' relates to electricity, gas and other fuel.

Source: Association of Consumer Credit Information Suppliers, ACCIS survey 2010

Another service that is often provided by credit bureaus is identity checking. Since it is not a core credit bureau activity, the number of countries in which such a service is provided is much lower than for credit applications. The same is the case for debtor tracing, which is used to identify and track down individuals that have outstanding debt and secure the repayment. As can be seen in the Annex, it is actually more or less the same two countries in which such services are provided.

For fraud prevention and detection, banks and retailers are again the two client groups that obtain access to consumers' data in more countries than other clients.

In addition to the above-mentioned services that rather focus on individuals and the evaluation or verification of their data, credit bureaus in 12 countries also make data available to governments and/or central banks for monitoring and policy purposes. They typically provide statistical reports at the aggregate level, not on individual debtors. Those reports are transmitted either on a regular basis or upon request.

Asked about what data clients and third parties have access to and whether they could see all data without any restriction, 16 bureaus answered (in 13 countries) in the positive and 12 in the negative (in eight countries). In cases where access is restricted, respondents specified that for instance government bodies or telecommunication companies only receive data relevant for their activity, non-banks receive less data than banks, data on positive data is only available to those supplying this type of data as well, also known as the 'reciprocity principle'.

This reciprocity principle is applied by most credit bureaus (24), implying that only organisations that share data may access data as well. Eighteen bureaus apply this principle in the strict sense, allowing for no exceptions.

Eleven organisations indicated that they use a system of 'closed user groups' where data provided by a certain group of clients is only accessible to members of this very same group. Some examples of such groups are telecommunication companies reporting

positive data on consumer contracts, warning registers of phone and utility companies or banks sharing data on financial crime of customers.

4.3 Means of access to data for user groups

European credit bureaus have developed a broad portfolio of database access possibilities, ranging from personal contact and hardware transmission (for example CDs) to internet applications and fully integrated system-to-system connections. The latter is offered to clients in all but two of the countries surveyed. Interestingly enough, in only one of the surveyed countries is information exchanged exclusively via web applications – as opposed to client database access via two or more channels in all remaining 22 countries. **Table 17** provides a full overview.

Table 17. Overview of the main access channels to credit bureau data for clients

Country	System-to-system connection	Internet application	Hardware (i.e. CD)	Fax	Telephone	Written paper reports
NO	X	X	X	X	X	X
DK	X	X	X	X	X	X
IS	X	X	X	X	X	
AT	X	X		X	X	X
FI	X	X	X	X	X	
HU	X		X	X	X	X
SE	X	X	X	X	X	X
TU	X	X	X		X	X
DE	X	X	X	X	X	X
PL	X	X	X	X		X
RS		X		X	X	X
RU	X	X		X	X	
NL	X		X	X		
UK	X	X	X			
IT	X	X	X			
BE	X	X				
CZ	X	X				
GR	X					X
HR	X	X				
RO	X		X			
SK	X	X				
SP	X	X				
SI		X				
Total	21	19	13	12	11	10

Source: Association of Consumer Credit Information Suppliers, ACCIS survey 2010

4.4 Data access and means of access for the data subject

While the importance of granting the data subject (consumers) access to the data stored on them is uncontested, diverging opinions exist as to whether access to own files should be provided free of charge and, if yes, how often per year. The final report of the EGCH showcases arguments in favour and against unlimited free access, but underlines the importance of guaranteeing high levels of transparency vis-à-vis the consumer. This way

he/she can understand the various types of information collected and access rights of third parties to be informed about data retention periods and how to exercise the right of access, rectification, erasure or blocking to and of his/her data.

Table 18. Consumers' right of access and rectification (# of CBs)

	YES	NO
Right to access own file	30	0
Free of charge?	20	10
<i>if yes, how often per year*</i>		
Once a year	7	
Twice a year	3	
Four time a year	2	
Unlimited access	7	
Right to rectification and erasure*	27	2
Free of charge?	27	0
Right to object*	29	0
Free of charge?	28	1

* No information available on one CB.

Source: Association of Consumer Credit Information Suppliers, ACCIS survey 2010

Table 18 indicates that all surveyed credit bureaus give consumers the possibility to access the information stored on them, with free access being granted in 20 of 30 cases. Free access, however, is often limited to a certain number of (one to four) free own credit reports per year: approximately 36% of the respondents grant unlimited free-of-charge access. For those credit bureaus that charge a fee for own credit reports, prices are listed in **Table 19**. It is often argued that the charges represent a contribution to the costs incurred by credit bureaus for providing the service of file access to consumers.

100% of those credit bureaus granting consumers the right to rectify and/or erase erroneous data offer these services free-of-charge. As regards the right to object, all institutions guarantee this right and only one credit bureau imposes a fee.

Table 19. Prices for own credit report

Country	Price for own credit report	
	<i>In Euro*</i>	<i>In local currency</i>
CZ	3.9/7.8	100/200 CZK
DK	2	15 DKK
HR	5.5-13.8	40 - 100 HRK
IT	7/10	7/10
NL	4.95	4.95
SK	3	3
UK	2.3	2 GBP
<i>In these countries, one free report is provided per year. Figures indicate price for each additional report.</i>		
AT	22	22
DE	18	18
HU	9.8	2625 HUF

* Prices were calculated with exchange rate of 30/04/2010 and rounded to next decimal.

Source: Association of Consumer Credit Information Suppliers, ACCIS survey 2010

In all countries covered by this survey, consumers can gain access to their own reports by ordering it either by post or in person or both possibilities.⁷ In addition to these 'traditional' means, this service is also provided via telecoms: in twelve countries by

⁷ For one country, information on data access means was not provided.

internet and/or e-mail and in five by phone. In seven countries, it is also possible to order the file via fax, branch offices or lenders.

To receive the file, credit bureaus in all countries send out reports by post. In most countries (17), it is possible to pick up the credit report in person while files are accessible via the internet in only ten countries and may be received by a 3rd party in five. In a few cases, the report may also be obtained via fax, e-mail or on the phone. *Table 20* below displays the number of countries for each service.

Table 20. Means of access to data (# of countries)

How do consumers order/ access their own file?							
Countries	Post	In person	Internet	E-mail	Telephone	SMS	Other
	18	19	8	9	5	0	7
How do consumers get access / receive their file?							
Countries	Post	In person	Internet	From a 3 rd party			Other
	22	17	10	5			4

Source: Association of Consumer Credit Information Suppliers, ACCIS survey 2010

Annex 1. Loan data stored per surveyed country

Annex 1 complements information of *Figure 6* by providing a country-level breakdown for data stored on the type of loan product and the details on the credit contract.

Country	Type of loan product								Details on credit contract				
	Home purchase / mortgage	Credit and store card	Loans	Overdraft	Retail / Instalments	Telecoms	Mail order	Utility	Original amount of credit	Outstanding amount	Duration of loan	Periodicity of repayment	Interest rate
AT	X	X	X	X			X		X		X		
BE	X	X	X		X				X		X	X	
CZ	X	X	X	X					X	X	X	X	
DE	X	X	X	X	X	X	X	X	X	X	X	X	X
DK	X	X	X	X	X	X	X	X		X			
GR	X	X	X	X	X				X	X	X	X	
HR	X	X	X	X	X				X	X	X	X	
HU	X	X	X	X					X	X	X	X	
IS	X	X							X				
IT	X	X	X	X	X				X	X	X	X	
NL	X	X	X	X	X	X	X		X		X		
PL	X	X	X	X	X	X	X	X	X	X	X	X	X
RO	X	X	X	X	X				X	X	X	X	
RS	X	X	X	X					X	X	X	X	
RU	X	X	X	X	X	X		X	X	X	X	X	
SE	X	X	X							X			
SI	X	X	X	X	X				X	X	X		
SK	X	X	X	X					X	X	X	X	
SP	X	X	X		X	X			X	X		X	
TU	X	X	X	X	X				X	X	X	X	
UK	X	X	X	X	X	X	X	X	X	X	X	X	
Total	21	21	20	17	14	7	6	5	19	17	17	15	2

Note: No information available for Finland and Norway.

Source: Association of Consumer Credit Information Suppliers, ACCIS survey 2010

Annex 2. Access to data by type of organisation

Annex 2 consists of five tables, each table giving information on the access for one of the five purposes: credit applications, identity checking, debtor tracing, fraud prevention and detection and staff vetting.

Credit applications	BANKS	RETAILERS	Mortgage providers	Insurance companies	Debt collectors & purchasers	ENFORCEMENT DIVISION	Government departments	TELECOMS	Utilities (electricity, gas, other fuel)	Consultants	Brokers
AT	○	○	○	○		■	■				
BE	○	○	○	○		○					
CZ	○	○	○			■	■				
DE	○	○	○	○	○	○	○	○	○		
DK	○	○		○	○			○	○	○	
FI	○	○	○	○	○	○	○	○	○	○	○
GR	○	○									
HR	○										
HU	○	○	○		○						
IS	○	○	○	○	○	○	○	○	○	○	○
IT	○	○	○			○	■				
NL	○	○	○					○			
NO	○	○	○	○	○	○		○	○	○	○
PL	○	○		○	○				○		
RO	○	○	○	○		○	○				
RS	■	■									
RU	■	■	■	■	■			■	■	■	■
SE	○	○	○	■	■	■		■	■		■
SI	○	○									
SK	○	○									
SP	○	○		○	○	■		○			
TU	○	○		○							
UK	○	○	○	■				○	○	■	○
TOTAL	23	22	14	14	10	11	7	10	9	6	6

Note: "○" indicates either full (positive and negative) or negative data sharing only; "■" indicates access to public information or access to information with legal permission only; no symbol indicates "no access", "not applicable" or "no information".

Categories written in capital letters indicate grouping of several institutions under one heading: 'BANKS' includes public, private, post, cooperative and other banks; 'RETAILERS' encompasses leasing companies, credit card suppliers, retail credit suppliers; 'ENFORCEMENT DIVISION' covers courts, tax authorities and police; 'TELECOMS' refers to phone companies, internet providers and television suppliers.

Source: Association of Consumer Credit Information Suppliers, ACCIS survey 2010

Identity checking	BANKS	RETAILERS	Mortgage providers	Insurance companies	Debt collectors & purchasers	ENFORCEMENT DIVISION	Government departments	TELECOMS	Utilities (electricity, gas, other fuel)	Consultants	Brokers
AT	○	○	○	○		■	■				
BE											
CZ	■	■	■								
DE	○	○	○	○	○	○	○	○	○		
DK	○	■	■	■	■	■		■	■	■	
FI											
GR	○	○					○				
HR											
HU											
IS	○	○	○	○	○	○	○	○	○	○	○
IT	■	■	■								
NL											
NO											
PL	○										
RO											
RS											
RU	■	■	■	■	■			■	■	■	■
SE	○	○	○	○	○	■		■	○		■
SI											
SK	■	■									
SP											
TU											
UK	○	○	○	■	○	■	■	○	○	■	○
TOTAL	12	11	9	7	6	6	5	6	6	4	4

Source: Association of Consumer Credit Information Suppliers, ACCIS survey 2010

Debtor tracing	BANKS	RETAILERS	Mortgage providers	Insurance companies	Debt collectors & purchasers	ENFORCEMENT DIVISION	Government departments	TELECOMS	Utilities (electricity, gas, other fuel)	Consultants	Brokers
AT	○	○	○	○							
BE											
CZ	■	■	■								
DE	○	○	○	○	○	○	■	○	○		
DK	○	○		○	○				○	○	
FI											
GR											
HR											
HU						■	■				
IS	○	○	○	○	○	○	○	○	○	○	○
IT	■	■	■								
NL											
NO											
PL	○	○		○	○			○	○		
RO	○	○	○	○							
RS											
RU	■	■	■	■	■			■	■	■	■
SE	○	○	○	■	■			■	■		■
SI											
SK	■	■									
SP											
TU											
UK	○	○	○	■	○	■	■	○	○	■	
TOTAL	12	12	9	9	7	4	4	6	7	4	3

Source: Association of Consumer Credit Information Suppliers, ACCIS survey 2010

Fraud prevention and detection	BANKS	RETAILERS	Mortgage providers	Insurance companies	Debt collectors & purchasers	ENFORCEMENT DIVISION	Government departments	TELECOMS	Utilities (electricity, gas, other fuel)	Consultants	Brokers
AT											
BE											
CZ	■	■	■								
DE	○	○	○	○	○			○	○		
DK	○	○		○	○				○	○	
FI	○	○	○	○	○	○	○	○	○	○	○
GR	○	○					○				
HR											
HU											
IS	■	■	■	■	■	■	■	■	■	■	■
IT	○	○	■			■					
NL											
NO											
PL	○										
RO	○	○	○	○							
RS											
RU	■	■	■	■	■			■	■	■	■
SE						■					
SI											
SK	■	■									
SP											
TU											
UK	○	○	○	■	○	■	■	○	○	■	■
TOTAL	12	11	8	7	6	5	4	5	6	5	4

Source: Association of Consumer Credit Information Suppliers, ACCIS survey 2010

Staff vetting	BANKS	RETAILERS	Mortgage providers	Insurance companies	Debt collectors & purchasers	ENFORCEMENT DIVISION	Government departments	TELECOMS	Utilities (electricity, gas, other fuel)	Consultants	Brokers
AT											
BE											
CZ											
DE	■	■	■	■	■			■	■		■
DK	○	○	○	○	○	■	■		○	○	■
FI											
GR											
HR											
HU											
IS	■	■	■	■	■	■	■		■	■	■
IT											
NL											
NO											
PL											
RO											
RS											
RU	■	■		■	■				■	■	
SE						■					
SI											
SK											
SP											
TU											
UK	○	○	○	■	○	○	■	○	○	■	■
TOTAL	5	5	4	5	5	4	3	2	5	4	4

Source: Association of Consumer Credit Information Suppliers, ACCIS survey 2010

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