

Risk Note

Balancing Collection of Data with Data Protection

Description of how to ensure GDD collection is balanced and aligned with data protection requirements.

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GDD collection must be balanced and aligned with data protection requirements, with due consideration for proper data ownership and minimization. While DFSPs and Inclusive IPSs have access to rich transaction data, they must ensure that their data collection, usage, and dissemination aligns with local privacy laws and, importantly, their consumers' expectations of trust. Data about women end-users' account usage should be used to inform product offerings and system rules as they pertain to women. If GDD is used for other purposes (such as targeted advertising) that aren't intended to benefit end users, women end-users' trust may be threatened, limiting potential uptake.