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(a) The WG recommends that the mandatory registry of all DLAs should be carried out every year, even for loans below Rs. 200,000/-, with unique ID of these DLAs being made public and allowed to be accessed by consumers, analysts, regulators, etc. The RBI can use the unique DLAs to provide the information such as interest rates, repayment modes, etc. to consumers and FinTech firms in a single platform. The WG acknowledges that the impact of mandatory registration of DLAs at critical moments such as providing information for consumer credit score to big financial players, etc. may be significant. However, the DLAs may not be entirely free from mis-selling, i.e. providing incorrect information to consumers; erroneous credit score, as envisaged in the 'Nano Gold Report', etc. Such actions in gross violation of privacy will need to be adequately identified and notified. The DLAs should be treated like financial products and standard principles be applied to rules or guidelines on consumer protection. This includes disclosure of key information, right to change and cancellation, etc. to which the WG does not subscribe, except for those that are crucial to the fitness of the DLA as a product, and there are stringent provisions on such disclosures in regulatory framework applicable to financial products. The WG is of the view that the imposition of a deadline for compliance with such provisions may lead to inconsistency and may put the DLAs at an unfair disadvantage in comparison to other products. Hence, the WG recommends that the deadline for complying with such provisions be deferred beyond the deadline for the closing of the DLA.

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