

12 December 2016

The Office of The Privacy Commissioner
PO Box 10 094,
The Terrace,
Wellington 6143

Dear Privacy Commissioner,

RE : Submissions on the Credit Reporting Privacy Code Review

I would like to make the following submissions in respect of this review.

(1) Use of the Driver Licence as an identifier.

A previous Privacy Commissioner, Bruce Slane, predicted that the driver licence would quickly turn into a national ID card, and would be quickly be demanded by employers, businesses and others as “ID” even when there was no driving required.

This has clearly become the case, with the driver licence demanded as “ID” for every transaction from dumping scrap metal, to changing your address or doing a mail redirection at the post office.

I would like to submit that the Privacy Commission should end the use of the Driver Licence as an ID card.

If New Zealand really needs an ID card, then this should be debated widely, and Government should, if it feels it has the mandate create a law providing for an ID card.

In the mean time, the use of the Driver Licence means the outcome of a National ID card has occurred, without democratic process.

(2) Use of the Driver Licence as an online identity card.

The Driver Licence is frequently used as an online identity card. The NZTA offers services like DLVS and “DriverCheck” via which they confirm that the details supplied are valid, and this has become a virtual online ID card.

This is an essential enabler of identity fraud.

My driver licence details have been demanded by the scrap metal merchant, the DVD rental shop, by the garage I rented a trailer off, and by NZ Post when I collect parcels, as well as dozens of other agencies.

The information on it, can no longer be considered “confidential”, as its now a secret, held by dozens of people, with who knows what kind of privacy or ethical structure.

Yet, I can phone up, or go online and get all sorts of services via quoting the front of card details to

a service provider.

Electricity, water, gas, store cards, cellphones etc etc can all be ordered on credit, online by anyone who quotes the correct information.

The business in question is satisfied, that it has identified me, yet it hasn't.

It has given a high value of confidence to an online transaction, that it should have given no confidence to

I would like to submit that the Privacy Commission should end the use of the Driver Licence as an online ID card.

The correct product is "Real Me", an online identity verification service provided by government specifically for this kind of transaction. The Driver Licence is not the correct system and is extremely privacy and identity vulnerable.

(3) Positive Credit Reporting and consent.

There may or may not be advantages to consumers from positive credit reporting. I for one have never been offered a better deal, or cheaper interest rate as a result of my excellent credit record.

But businesses are adequately protected from bad debtors by conventional credit reporting. The credit agencies DO NOT need to know who I bank with, who supplies my electricity, what my annual expenditure on the internet or petrol is to establish that I pay my bills on time.

I made it very clear to all my suppliers, that they had my consent to pass on my details to credit agencies IF I did not pay my bills. But I was NOT consenting to positive credit reporting.

Without exception I was told I can't say no. If I was going to remain connected to electricity, have a telephone, or a bank account, then I was going to have to consent.

I would like to submit that its fair and reasonable for a business to be able to report bad debts to a credit agency, but the Privacy Commission should make positive credit reporting an "opt in" procedure.

If it really does hold the advantages to the consumer that the credit agencies insist it does, consumers will be quick to "opt in".

Thank you for considering my submission.

Yours faithfully

David Reid