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It has been attempted to capture the key aspects of key FinTech products that would apply to DLAs/ LSPs in the final draft. Those products falling in to the definition of DLAs/ LSPs but not covered in details in the Act, such as data brokers and sub-agents with segregated account for respective DLAs/ LSPs etc, would continue to attract the regulatory approach as DLAs/ LSPs or their business processes, involve collection of personal data and yet the Act does not specifically mention them. 18. DLAs/ LSPs are also required to submit 'Information under the Law' to RBI within a specified time from the date of receipt of the notification of commencement of business. The time interval between each submission of information under the law shall be specified in the rules issued by the Reserve Bank. RBI will publish guidelines for FinTech activities with DLAs/ LSPs, and state associations may also publish their own guidelines for their DLAs/ LSPs. A regulatory framework can be built when DLAs/ LSPs follow a uniform set of practices and principles. This can be facilitated through a code of conduct. 4. Small loans of \$2,000 or less: These are loans (such as payday or installment loans) that cannot be sold or resold as a pool to a single lender, unless those loans are offered by a payday lender and sold on a weekly or daily basis. (See the FAQs below for more information on smaller loans). This is generally perceived to be a riskier product with no upfront advantage for the borrower because unlike interest-only or principal-and-interest (POI) loans, they generally have annual payments for the entire term. The loans are offered through intermediaries and are designed to be repaid within a relatively short period of time. Typically, they are offered either in direct contact with consumers through storefront operations or through telemarketing. The prohibition on closed-end loans on the term of one year or less is intended to target payday lending.

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Due to the high penetration of smartphones, tablets and internet connectivity, a high proportion of the urban and rural population has access to digital financial platforms in India, which has resulted in increasing adoption of digital financial products. The digital financial revolution has already led to the emergence of a range of new business models, new channels and new players. In particular, the mobile payments market has achieved rapid success with both the Indian government and mobile operators contributing to the growth. Early mobile wallet operators saw the Indian mobile market as a low cost, large scale market with volume of transactions in the region of US\$ 20 billion in 2016 rising to US\$ 111.6 billion in 2017 and expected to touch nearly US\$ 2028.2 billion by 2023. With Indian consumers already spending more than 10% of their pre-tax incomes on digital payments through wallets, statistics (e.g., McKinsey's Digital Retail: Challenging the B2B model) clearly indicate that the mobile wallet space is expected to grow rapidly over the coming years, with a projected average growth rate of 19% to reach nearly US\$ 1 trillion in 2023. For mobile payments, the use of mobile phones with a single NFC-enabled SIM card as an additional contactless card where merchants pay for in-store purchases through the said SIM card in the operator wallet app. 2. Digital footprint, such as transaction details, app usage data, etc. - This data can be aggregated and de-identified and is currently aggregated with the transaction details for consumer credit in mainstream lending. 5ec8ef588b

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