BANK NEGARA MALAYSIA
CENTRAL BANK OF MALAYSIA

Open Finance Policy Document

Frequently Asked Questions (FAQs)

Issued on 17 November 2026

Introduction

This Frequently Asked Questions (FAQ) document is designed to guide financial service providers (FSPs) in interpreting and implementing the requirements set out in the Policy Document on Open Finance (OF PD) issued on 17 November 2026. It aims to clarify key provisions, address common queries, and provide practical guidance to support the orderly, secure, and effective implementation of open finance.

Please note that this FAQ does not replace the OF PD. Rather, it serves as a complementary reference to promote consistent understanding and application of the OF PD across the industry.

Interpretation

Participation and scope of information sharing

1. **Can FSPs that do not meet the mandatory participation thresholds as specified in the OF PD participate in open finance? [Paragraph 9.1]**

   Yes. An FSP that does not meet the mandatory participation thresholds may participate on a voluntary basis, subject to compliance with the requirements set out in the OF PD applicable to its participation, as well as the relevant rules and standards specified by the open finance platform operator.

2. **Can an FSP participate solely as a data provider? [Paragraph 9.1]**

   Whether an FSP may participate solely as a data provider depends on whether it meets the mandatory participation thresholds specified in the OF PD.

   - If the FSP meets the mandatory participation thresholds, it is required to participate as both a data provider and a data consumer for the customer information category (i.e. individual or SME) to which that threshold applies.
   - If the FSP does not meet the mandatory participation thresholds, it may voluntarily participate solely as a data provider.

3. **When is an FSP required to provide data consumer functionalities for SME customers? [Paragraph 9.7]**

An FSP that exceeds the participation threshold of 250,000 active individual and SME customers must participate as both a data provider and a data consumer for individual customer information.

A separate threshold applies to the mandatory participation requirements for SME customer information. An FSP is required to participate as both a data provider and a data consumer for SME customer information only if it has more than 30,000 active SME customers.

Where an FSP does not meet the SME participation threshold, it is not required to provide data consumer functionalities for SME customer information.

The table below provides illustrative examples of how the participation thresholds apply in different scenarios:

FSP	***Active customer base***	***Aggregate threshold exceeded?***	***SME-specific threshold exceeded?***	***Mandatory information sharing***	***Mandatory data consumer functionalities***
FSP A	**335,000 total** Individual: 300,000 SME: 35,000	Yes	Yes	Individual and SME customer information	Individual and SME customer information
FSP B	**330,000 total** Individual: 300,000 SME: 30,000	Yes	No	Individual customer information only	Individual customer information only
FSP C	**230,000 total** Individual: 200,000 SME: 30,000	No	No	Not mandatory	Not mandatory

Consent validity, expiry and renewal

4. **What measures could an FSP adopt to securely retain information where customer consent has been revoked or has expired without renewal, but the customer information is required to be retained to comply with applicable laws and regulatory requirements? [Paragraph 11.10]**

   Where customer consent is revoked or expires without renewal, an FSP is expected to cease any further access, use or disclosure of the affected customer information under the open finance arrangement. This does not prevent the FSP from retaining or processing the information to the extent necessary to comply with applicable legal or regulatory requirements.

   In such situations, an FSP may consider adopting the following safeguards:

   - restricting the use of retained customer information solely to the purpose for which retention is required;
   - implementing appropriate access controls to limit access to retained customer information to authorised personnel on a need-to-know basis;
   - maintaining retained customer information in archived, segregated or otherwise restricted-access environments;
   - implementing controls to identify customer information associated with revoked or expired consent and prevent any further use or disclosure under the open finance arrangement;
   - maintaining audit trails of access to and actions performed on retained customer information;
   - conducting periodic reviews of retained customer information to ensure continued retention remains necessary; and
   - establishing appropriate disposal processes to ensure that customer information is securely disposed of when it is no longer required to be retained.

   The above examples reflect practices observed in the financial sector, including approaches adopted in other jurisdictions, and are provided solely as illustrations of measures that FSPs may consider. They are not intended to prescribe any specific technical, operational or system solution.

Data security

5. **How do the customer authentication and authorisation requirements apply to SME customer information where multiple persons may act on behalf of an SME? [Paragraph 12.6]**

   BNM recognises that certain SME use cases may involve circumstances where the person initiating a request through a data consumer is not the same person who ultimately authorises the disclosure of customer information at the data provider. Such scenarios may include arrangements involving authorised representatives or multiple authorised persons acting on behalf of an SME customer.

   While the OF PD does not currently provide detailed customer journeys or operational arrangements for such scenarios, BNM intends to work closely with PayNet and industry participants, including through the SME pilot group, to develop the appropriate standards, customer journeys and operational arrangements necessary to support SME use cases and ensure industry readiness ahead of the mandatory sharing of SME customer information from 1 January 2030, while maintaining appropriate customer protection safeguards.