



台灣金融科技發展 100 個關鍵問題

安侯企業管理股份有限公司

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台灣金融科技發展 100 個關鍵問題

100 Questions: FinTech Development in Taiwan



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緣起

Introduction

全球金融科技投資持續熱絡發展，亞太地區的新創企業更是迅速崛起，科技帶來的新興商業模式改變了消費者的生活型態。台灣金融科技產業在金管會的開放及各級政府單位的協助下，正在逐步萌芽成長。然而綜觀各國金融科技的發展與規模，台灣尚屬起步階段，如何能快速迎頭趕上成為我國金融科技發展之關鍵問題。

有鑒於此，KPMG 安侯企業管理股份有限公司、中華金融科技產業促進會、CRIF 中華徵信所以及東方快線網絡市調，在 2019 年底共同邀請政府相關單位、消費者、金融業、金融科技業以及長期關心金融科技發展的學者專家共同舉辦「台灣金融科技 100 個關鍵問題」論壇。藉由眾人的參與、思考並聚焦出台灣金融科技發展的關鍵問題，會後更共同彙編相關資料並出刊成冊。期望能透過此份報告，在產、官、學各界的通力合作下逐步解決現有問題，讓消費者可以享受金融科技創新帶來的便捷與安全的服務，讓台灣金融科技發展腳步跟上亞太、全球趨勢。

Global FinTech investment continues to develop vigorously, and startups in the Asia-Pacific region are rising rapidly. Technology-led new business models have changed the lifestyle of consumers. The development of FinTech in Taiwan is sprouting and growing with the open up of Financial Supervisory Commission, R.O.C. and government cooperation across all levels. However, looking at the development and scale of FinTech in various countries, Taiwan is still at the stage of initiation. How to catch up quickly has become a key issue of Taiwan FinTech development.

Given this identified issue, KPMG Advisory Services Co., Ltd., together with FinTech Industry Development Association(FIDA), CRIF China Credit Information Service, Ltd., and Eolembrian Co., Ltd., the Taiwan FinTech Top 100 issues forum in the end of 2019. The forum gathered interested stakeholders across public sectors, academics, financial institutions, and FinTechs to give thoughts and comments on FinTech development issues in Taiwan. We expect the publication of Taiwan FinTech Top 100 Issues stimulates cross-sector cooperation and bring solutions to identified issues. Ultimately, end-users and consumers may benefit from the convenience and secured services of FinTech innovation.



KPMG 台灣所
副執行長
金融服務產業主持會計師

吳麟



KPMG 台灣所
數位創新服務營運長

賴輝

KPMG 簡介

About KPMG



KPMG 台灣所歷經多年不斷的發展與成長，目前有超過 120 位執業會計師及企管顧問等負責人，及超過 2,400 位同仁，服務據點遍及台北、新竹、台中、台南、高雄五大城市，為目前國內最具規模的會計師事務所及專業諮詢服務組織之一。

KPMG 安侯企業管理股份有限公司

KPMG 安侯企業管理股份有限公司為 KPMG 在台灣轄下組織之一，其長期深耕數位發展議題，協助企業解決數位轉型困境。藉由整合國際資源並與在地接軌，帶領專業團隊提供數位發展策略及轉型規劃，打造企業營運新動能，以成為台灣產業最有溫度的數位轉型推手為目標。提供包括數位通路客戶經營、產品與服務發展規劃、客戶體驗策略、企業營運模式設計、創新科技應用等服務。

KPMG Taiwan has experienced continuous growth in recent years, with over 120 certified public accountants and advisory executives, as well as over 2,400 general colleagues. KPMG Taiwan service bases are located in Taipei, Hsinchu, Taichung, Tainan, and Kaohsiung, and is currently one of the largest accounting firms and professional advisory service organizations.

KPMG Advisory Services Co., Ltd.

KPMG Advisory Services Co., Ltd. is one of KPMG's subsidiary organizations under the jurisdiction of Taiwan. KPMG Advisory has been deeply involved in digital development issues for a long time, assisting enterprises to solve the dilemma of digital transformation. By integrating international resources and connecting with local areas, KPMG provides digital development strategies and transformation plans to create new momentum for business. KPMG Advisory aims at being the all-round leader of digital transformation in Taiwan, providing services including digital channel management, product and service strategic planning, customer experience strategy, enterprise operation model design, and innovative technology applications, etc.

參與單位 Participants

中華金融科技產業促進會 (FIDA / FinTech 產促會)

中華金融科技產業促進會是一個位於台灣獨立運作，並最具影響力的金融科技非營利組織，成立宗旨在於協助台灣發展金融科技创新產業，除了與國際金融科技業者或組織交流外，更扮演會員與政府機構一個溝通介面，並將產業資訊分享給相關政府單位，並協助會員獲得創新發展業務時需要的幫助。目前協會與香港、新加坡、泰國、瑞典、哈薩克等國際金融科技協會均締結聯盟，協助雙方會員互助交流，同時目前會員人數上千人，包括：金融科技、既有金融相關業者、法律界、學術研究機構，以及網路、製造與零售業者等。



FinTech Industry Development Association (FIDA)

FIDA is an independent and most influential FinTech nonprofit organization in Taiwan. It was established to assist Taiwan in the development of FinTech innovation industry. In addition to communicating with international FinTech companies and organizations, it also acts as communication interface of the members and governments, sharing industry information with relevant government units, and assisting the members in innovative business development. At present, FIDA has formed alliances with international FinTech associations in Hong Kong, Singapore, Thailand, Sweden and Kazakhstan to assist the members of both parties to exchange and give mutual supports. Meanwhile, currently, the number of FIDA members is over 1,000, including: FinTech, existing financial related institutions, legal profession, academic institutions as well as operators in the Internet, manufacturing and retailing industry.

CRIF 中華徵信所

CRIF 中華徵信所為台灣最大商業諮詢公司，自 2016 年開始積極轉型成為金融科技業者，除了因應開放銀行浪潮成為指標性的 TSP 業者之外，更導入「徵信科技」(CredTech) 以帶動徵信產業之創新。CRIF 中華徵信所致力於成為金融業者的最佳夥伴之外，也希望在個人、企業與金融機構之間扮演更重要的中介角色，以創新科技打造更多創新服務，成為台灣徵信領域的先驅者。



CRIF China Credit Information Service, Ltd.

CRIF China Credit Information Service, Ltd. is the largest business consulting company in Taiwan. Since 2016, it has actively transformed into a FinTech operator. In addition to becoming an indicator of Third-party Service Provider (TSP) in response to the Open Banking wave, it has also introduced "CredTech" to drive up innovations in the credit information industry. CRIF China Credit Information Service, Ltd. is committed to becoming the best partner of financial service providers and also hopes to play a more important intermediary role between individuals, enterprises and financial institutions, create more innovative services with innovative technology, and become a pioneer in Taiwan's credit information field.

東方快線網絡市調

係由「東方線上 Eastern Online」結合國際知名網路調查公司「Embrain」共同整合市場行銷研究的技術與資源，合作成立具顛覆傳統的網路市調公司，並構築了數位化的市場資訊蒐集技術於網路平臺上，提供全能、適時的市場研究經驗與技術，並賦予「迅速、即時、創新」的專業精神，讓市場研究可測量性更簡單、費用更有所值。東方快線目前擁有 20 萬實名市調會員，以此會員資料庫為基石，提供堅實可靠的消費者量化信息、高效率與更簡單的調查流程，並精確的分析資訊給予企業與個人，是我們成立的最大宗旨。



EOLembrain

EOLembrain is a collaboration between Eastern Online and the internationally renowned Internet research company Embrain to integrate marketing research technology and resources. This allows them to jointly establish a network marketing company that subverts the traditional network and builds a digital market information collection technology. It provides a well-rounded and timely market research experience, and endows the professionalism of "rapid, instant and innovative" to make the market research measurable and cost-effective. EOLembrain currently has 200,000 authentic survey members. Using this member database as the cornerstone, it provides solid and reliable consumer quantitative information, high efficiency, and a simple investigation process. Its accurate analysis of information for both companies and individuals is our biggest tenet of establishment.

推薦序 Recommendations



中華金融科技產業促進會
理事長 | 楊瑞芬

FinTech Industry Development
Association
Director General | Joanna Yang

金融科技在台灣才開始萌芽，目前金融科技產業也尚未有明確的主管機關，大部份的消費者也還不明瞭傳統金融業與金融科技業的差異。然而許多主流國家在面對金融科技的浪潮下，不少都拉出了明確的國家發展政策來支持其國內的金融科技發展，畢竟金融科技象徵著數位經濟競賽前哨戰，而新加坡更企圖運用積極的政策來搶下亞洲金融科技的霸權。自2016年起便主導召集政府、金融業者與金融科技業者，共同討論聚焦出新加坡100個金融科技關鍵問題。之後便針對問題提出解決方案，而找不到立即解法的問題也在新加坡金融科技嘉年華中以舉辦黑客松方式來號召解法，使得其國家阻礙金融科技的發展問題可以一一被面對、被解決。

此次在KPMG安侯企管、CRIF中華徵信所以及東方快線網絡市調的協助下，我們集合了政府相關單位以及金融業、金融科技業等業界、學界代表們共400多人，共同參與討論並聚焦了我們國家金融科技發展的關鍵問題。再經由KPMG安侯企管的整理匯整後，釐清這些關鍵問題點，未來更期待繼續這樣的產官協作，一齊來幫助台灣發展我們自己的金融科技創新產業，讓台灣的數位經濟不落人後。

FinTech is just begin to sprout in Taiwan. At present, the FinTech industry has not yet had a clear competent authority, and most consumers have yet to understand the difference between the traditional financial industry and the FinTech industry. However, in the face of the wave of FinTech, many countries have drawn up explicit national development policies to support their domestic development of FinTech. After all, FinTech symbolizes the outpost of digital economic competitions, and Singapore has tried to use active policy to seize the hegemony of FinTech in Asia. Since 2016, it has led the convening of government, financial institutions and FinTech companies to propose 100 FinTech Problems to Solve for Singapore. They further forward solutions to identified problem, and solve remaining problems by calling for FinTech Hackcelerators in the Singapore FinTech Festival, so that the treadstone of FinTech development is removed one after one.

With the support of KPMG Advisory Services Co., Ltd., CRIF China Credit Information Service, Ltd., and Eolembrian Co., Ltd., we gathered more than 400 professionals from governments, the financial industry, the FinTech industry, and other industry and academia representatives to participate in this discussion and focus on the key to the development of FinTech in our country. The problems will be sorted out and clarified by KPMG Advisory. In the future, we look forward to continuing such collaboration between industries and governments to develop our own FinTech innovation industry in Taiwan and keep Taiwan's digital economy in pace with global trends.

推薦序 Recommendations



CRIF 中華徵信所
總經理 | 郭曉薇

**CRIF China Credit Information
Service, Ltd.**
General Manager | Alice Kuo

台灣的金融科技實力，放諸世界，其實不容小覷；而隨著金管會的積極開放，台灣的金融科技產業也隨之多元發展，相關的產業應用也不斷的應運而生。有鑒於此，CRIF 中華徵信所，自 2016 年開始即積極進行數位轉型，與 CRIF 總公司的共同合作，導入「徵信科技」(CredTech)，同時也開發「AML/KYC 合規問題解決方案」、「中小企業信用風險平台 (MR.Report)」兩大創新應用服務，利用強大的資料庫大數據結合社群網路聲量及另類數據的綜合評分，加上人工智慧與機器學習，期望提升金融相關業者在評估企業信用風險的效率及正確性。除了希望因應開放銀行浪潮成為指標性的 TSP 業者之外，更期待上述兩大創新服務協助金融業者解決現行 KYC 機制在整體流程與作業效率上的痛點，以及進行中小企業徵信時資訊不足的難處。

最後，感謝產促會楊理事長瑞芬、KPMG 安侯企管賴營運長偉晏以及東方快線網絡市調的抬愛，讓 CRIF 中華徵信所能夠共同參與《台灣金融科技發展的 100 個關鍵問題》的出版，在此衷心期望藉著本書的出版，能夠引領台灣開創金融科技的新紀元。

Taiwan's FinTech strength as placed in the global market is still fairly remarkable. Along with the successive open up of Financial Supervisory Commission, the FinTech development in Taiwan has been diversified and triggered relevant industrial applications. In view of this, CRIF China Credit Information Service, Ltd. has been actively undergoing digital transformation since 2016, and has cooperated with CRIF head office to introduce "CreditTech" (CredTech), and also develops "AML/KYC compliance solution", "Small and Medium-sized Enterprises Credit Risk Platform (MR.Report)" two innovative application services. CRIF expects to improve the efficiency and accuracy of corporate credit risk assessment for financial service providers by use of the powerful Big Data, the combination of social listening and the comprehensive score of alternative data, artificial intelligence and machine learning. In addition to becoming an indicator of Third-Party Service Providers (TSP) in line with the open banking wave, it also looks forward to providing solutions to the above two innovative services, assisting financial service providers in solving the critical points of the current KYC mechanism and operating efficiency in overall processes as well as the lack of information when conducting SMEs credit reporting.

Finally, we would like to thank Director General Rui-Fen Yang of FIDA, Wayne Lai from KPMG Advisory and Eolembrian Co., Ltd., for their support so that CRIF China Credit Information Service, Ltd. can participate in the compilation and publication of 《100 Questions : FinTech Development in Taiwan》. We sincerely look forward to the publication of this book which brings in a new era of FinTech in Taiwan.

作者序

Editor's preface



KPMG 台灣所
數位創新服務營運長 | 賴偉晏

KPMG Taiwan
Head of Digital | Wayne Lai

疫情過後百業待甦，全球經濟行為與發展受到質與量的明顯變化，雖然各國政府紛紛出手挽救，仍對企業造成一定衝擊。在這個企業最艱困的時刻，卻也是發展數位金融的最好時機。例如遠端工作增加了企業對於數位平台、遠端通訊、資訊整合工具的需求，為各種新創業者帶來機會；保持社交距離及減少外出，提升消費者使用非接觸式支付、網路銀行等數位金融服務之意願，為支付、電商以及宅經濟帶來商機；中小企業在缺少資金營運的情況下，也更願意嘗試線上小額借貸的 P2P 平台。

企業在發展數位金融的過程中必然會遭遇挑戰與困境，不論是內部企業的技術運用與發展策略，或是外部環境的建置規劃與法律規範。諸多當前發展金融科技的困難點，都在《台灣金融科技發展 100 個關鍵問題》中被提出討論。我們發現這些問題非憑一己之力可以順利解決，需多方合作共同解決。因此希望藉由官方、專家、學者、業者及消費者的共同聚焦，一起定義且探討台灣目前金融科技發展所面臨困難的可能解法及因應之道。期待透過眾人通力合作，組成金融科技的台灣隊，搭上此波產業轉型機會，能將台灣的金融科技能量徹底釋放。也非常感謝中華金融科技產業促進會、CRIF 中華徵信所以及東方快線網絡市調，在各方面的大力協助，讓此刊物能夠順利出版、內容更加完臻。

After the pandemic, businesses are waiting for resumption. The global economic development has undergone significant changes in quality and quantity. Although governments in all countries have adopted measures, the pandemic has struck certain impact on enterprises. At this most difficult time for enterprises, it is also the best time to develop digital finance. For example, work from home drives up the demand for digital platform, remote communication and information integration tools, and brings in opportunities for startups; social distancing and reduced-travel increase the willingness of contactless payment and online banking services, and thus bringing business opportunities in payment, e-commerce and stay-at-home economy field; SMEs are more willing to try P2P lending platform for micro loan in the lack of working capital,.

Enterprises inevitably will encounter challenges and difficulties during the development of digital finance whether it is the technology use and development strategies of internal enterprises or the construction planning and legal regulations of the external environment. Many current difficulties in developing FinTech are discussed in <100 Questions : FinTech Development in Taiwan>. We found that these problems require efforts of all parties to solve them. Therefore, focusing on thoughts of officials, experts, scholars, operators and consumers, we will define and discuss possible solutions and solutions to the difficulties of FinTech development in Taiwan. Through the concerted efforts of ever party, it is expected to form a Taiwan FinTech team to release Taiwan's FinTech energy and seize the chance on industrial transformation. We are very grateful for the assistance provided by FinTech Industry Development Association , CRIF China Credit Information Service, Ltd., and Eolembrian Co., Ltd., for helping to make this publication comprehensive.

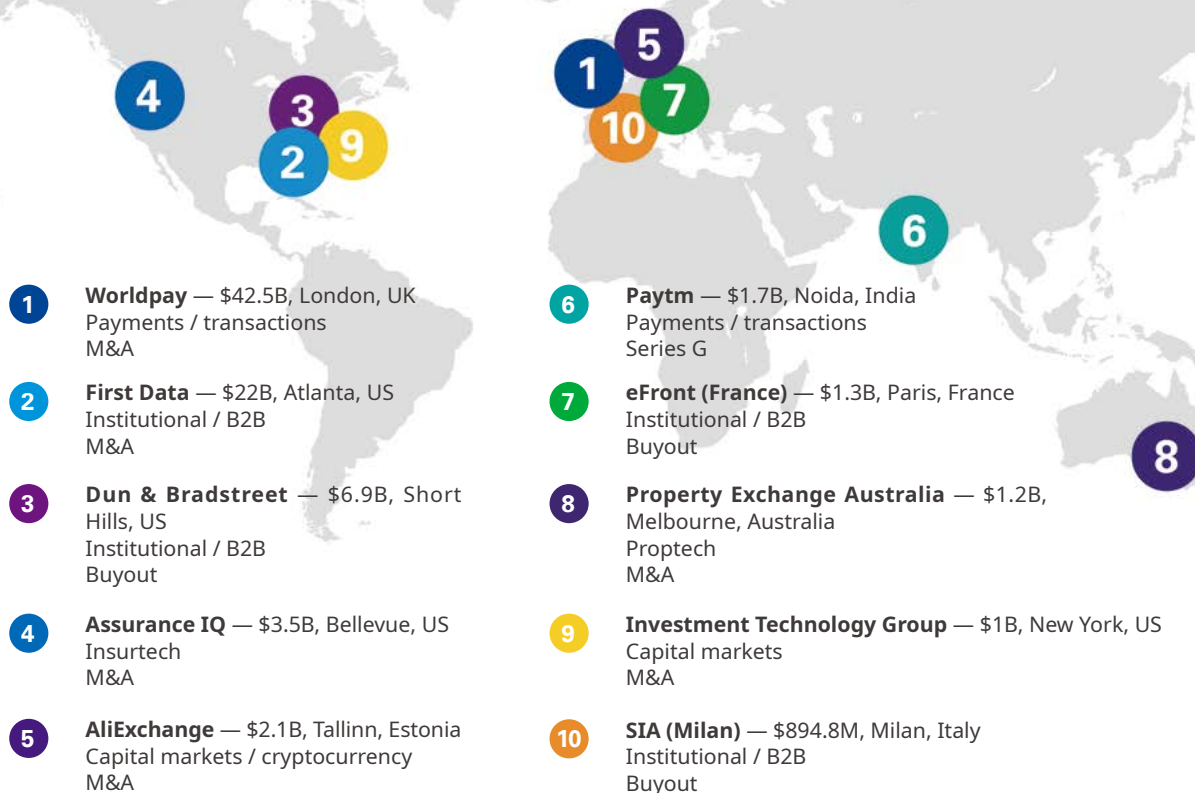


前言

全球與台灣
FinTech 發展

Foreword
Global and Taiwan
FinTech
Development Trends

Top10 Global Fintech deals in 2019



全球金融科技投資金額維持高檔

全球金融科技在經歷 2018 年的大量投資後，2019 年的投資總額仍然維持相對高檔，儘管交易總數與總金額些微下降，但是中規模的交易數量正在成長，也是近 10 年來全球 FinTech 投資金額次高的一年，並以支付相關領域為投資主軸。不同於前幾年的話題炒作，各國投資人的評估標準提升，出手變得更為謹慎。以地區來看，美洲和歐洲地區的投資金額皆持續成長，而亞洲則略微減少，2019 年全球投資 FinTech 公司交易 2,693 筆，投資金額達 1,357 億美元。支付及監管仍然是全球金融科技最熱門的領域，儘管監管科技投資總額有所下降，但交易量創下新紀錄。此外不動產科技的投資力道也相當強勁。技術層面上，網路安全及區塊鏈都吸引大量關注，網路安全更是唯一總額和交易數皆持續成長的領域。

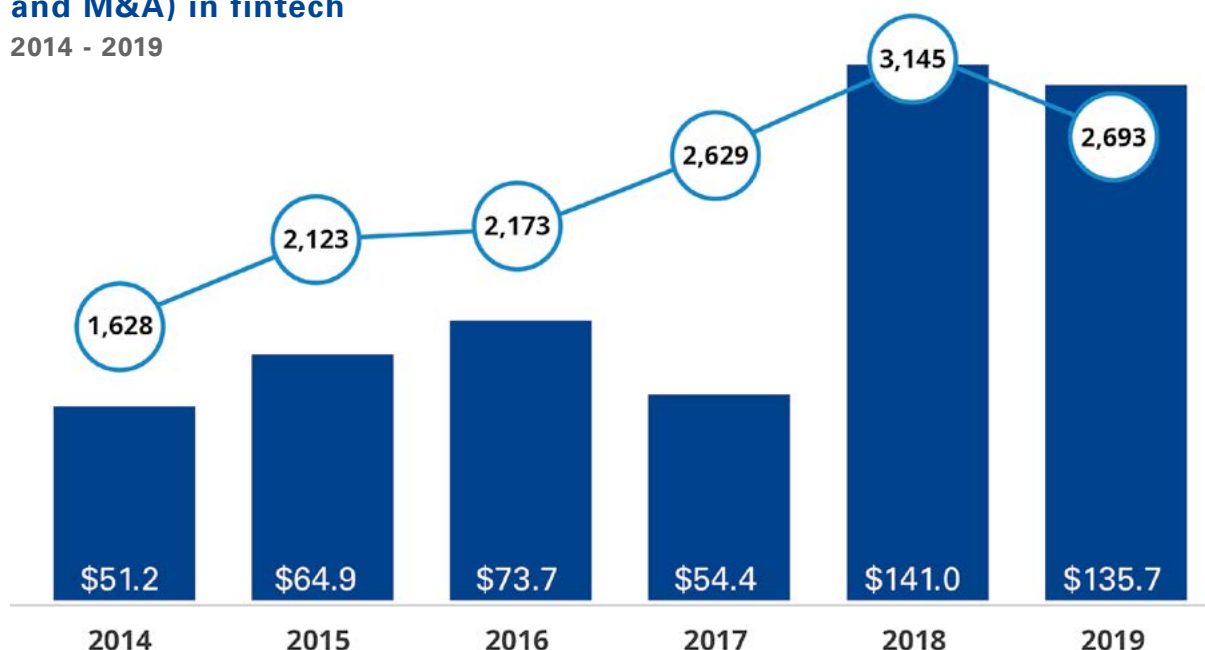
雖然有中美貿易緊張的局勢和地緣政治不確定性，但是 2020 年全球金融科技投資前景仍十分樂觀。開放銀行 (Open Banking) 以及 AI 相關技術應用逐漸成熟，將會是帶動下一波全球 FinTech 投資的重要項目。重要金融科技領域的技術應運日漸成熟，大型金融企業將持續透過合併或併購以獲取創新產品及服務。而受到全球新型冠狀病毒病 (COVID-19) 影響，進一步加速企業數位轉型導入遠端技術與科技應用，大型投資人趁此併購及投資進行市場留強汰弱。另一方面，民眾為了保持社交距離及減少外出，也增加了使用行動支付、網路銀行等數位金融服務之意願。

全球 Fintech 投資交易金額與筆數

Worldwide FinTech investment transaction value and the number of deals

Total investment activity (VC, PE and M&A) in fintech

2014 - 2019



Source: Pulse of Fintech 2019, Global Analysis of Investment in Fintech, KPMG International (data provided by PitchBook), as of 31 December, 2019.

Global investments in FinTech remains a peak

After experiencing a lot of investments in FinTech in 2018, global FinTech investments in 2019 remained high although the total number of transactions and the total amount have declined slightly. However, the number of medium-sized transactions was growing, and the FinTech investment amount hit a second high in the past 10 years. Of which, payment related investments were the key driver of the FinTech investment growth in 2019. Different from the hype in the past few years, the investors' evaluation standards are on the rise. Hence, they have become more cautious to invest. Regional-wise, the amount of FinTech investments in America and Europe continued to grow, while in Asia it decreased slightly. In 2019, there were 2,693 transactions in global FinTech investments, and the investment amount reached USD 135.7 billion. Payments and regulatory technology are still the hottest issues of global FinTech field. Although the total investment amount of regulatory technology has declined, the transaction volume has reached a new record. In addition, investment in real estate technology is also quite strong. On the technical level, cybersecurity and blockchain have drawn a lot of attention, and cybersecurity is the only sector where the total amount and the number of transactions grow continually.

Despite the tension of US-China Trade War and geopolitical uncertainty, the prospects for global FinTech investment in 2020 are fairly promising. Gradually matured Open Banking and the application of AI-related technologies will be the critical drivers of global FinTech investment. Pivotal FinTech technology applications are getting mature, and large financial companies will continue to obtain innovative products and services through mergers or acquisitions. Under the impact of COVID-19, enterprises accelerate the digital transformation and introduce remote technology and various applications. Large investors take advantage of this to stay strong via M & A and investments. On the other hand, social distancing and reduced travelling trigger willingness to the use of digital financial services, such as mobile payment and online banking.

Top 10 fintech deals in Asia Pacific in 2019

- 
- 1 Paytm —**
\$1.7B, Noida, India
Payments / transactions
Series G
 - 2 Property Exchange Australia —**
\$1.2B, Melbourne, Australia
Proptech
M&A
 - 3 Lotte Insurance —**
\$339M, Seoul, South Korea
Insurtech
Buyout
 - 4 Vietnam Payment Solution —**
\$300M, Hanoi, Vietnam
Consumer finance
PE growth
 - 5 Ouyeel —**
\$292.7M, Shanghai, China
Institutional/B2B
Late-stage VC
 - 6 Judo Capital —**
\$279.6M, Southbank, Australia
Lending
Buyout
 - 7 PolicyBazaar —**
\$238M, Gurugram, India
Personal finance
Series F
 - 8 WTOIP Intl. —**
\$224.8M, Guangzhou, China
Crowdfunding platform
Late-stage VC
 - 9 Blockchain Exchange Alliance —**
\$200M, Seoul, South Korea
Cryptocurrency/blockchain
Late-stage VC
 - 10 Edaili —**
\$200M, Shanghai, China
Institutional/B2B
Series D

亞太地區百花齊放逐漸崛起

度過前三季的低點後，亞太地區金融科技投資總額在 2019 年底出現了強勁反彈，中國除了 P2P 借貸領域受監管機關的力道提升而些微下降影響。在支付領域佔據領導地位的大型科技公司，繼續專注在擴大中國以外的版圖。螞蟻金服 2019 年末在新加坡提交了數位銀行執照申請，而騰訊在中國以外地區（例如阿根廷）進行大量投資。印度的金融科技投資創下歷年新高，由於尚有許多無銀行帳戶或有貸款需求的未來客源可以發展，支付與借貸是其最熱門領域。

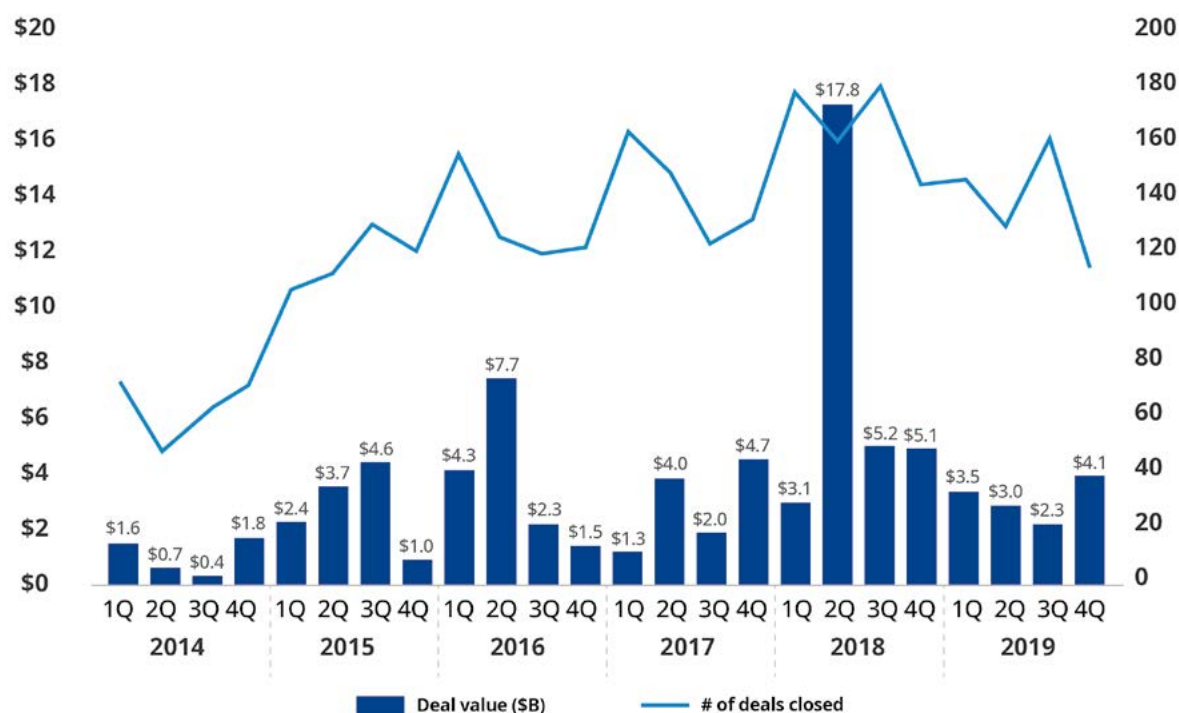
整體而言亞太地區的 FinTech 投資情況多元豐富，尤其新的 FinTech 公司在東南亞如雨後春筍般的成立。GO-Jek 是印尼版的 Uber，從運輸起家進而衍生出一系列的服務，例如 GO-BILLS 幫你付帳單、GO CLEAR 幫你打掃家裡，建立自己的生態圈。共享運輸公司 Grab 在泰國打敗 Uber、手機錢包公司 Momo 在越南逐漸崛起，可以看到印度、印尼、越南、泰國這些人口紅利龐大、經濟成長起飛的東南亞 FinTech 藍海市場，正受到全球投資者的青睞，快速成長。另一方面香港、新加坡、台灣分別發出 8 張、5 張、3 張數位銀行執照，也預計會是亞太地區 FinTech 下一階段的發展重點，若經營成功，其經驗將為亞太地區帶來更多 FinTech 投資與商機。

亞太 Fintech 投資交易金額與筆數

Fintech investment transaction value and the number of deals in Asia Pacific

Total investment activity (VC, PE and M&A) in fintech in Asia Pacific

2014– Q4 2019



Source: Pulse of Fintech 2019, Global Analysis of Investment in Fintech, KPMG International (data provided by PitchBook), as of 31 December, 2019.

FinTech investments in the Asia-Pacific region rise

After the lows of the past three quarters, the total FinTech investment in the Asia-Pacific region showed a strong rebound at the end of 2019. However, FinTech investments in Mainland China were affected by the P2P lending monitored by the supervisory authority. Large technology companies that are leaders in the payment field continue to focus on expanding their territory in countries other than Mainland China. For example, Ant Financial filed the digital bank application in Singapore at the end of 2019, while Tencent made significant investments in venues (such as Argentina) other than Mainland China. India's FinTech investment has reached a new high. Since the number of applicants for bank accounts or loans is quite large, payments and lending are the most popular segment for FinTech deals in India.

Overall, FinTech investments in the Asia-Pacific region are diverse, especially in Southeast Asia where new FinTech startups have sprung up. GO-Jek is an Indonesian version of Uber. It has derived a series of transportation services, such as GO-BILLS (a payment system) and GO CLEAR (to help you clean your home) and built its own ecosystem. The transportation-sharing company Grab defeated Uber in Thailand, and the mobile wallet company Momo gradually rose in Vietnam. It can be seen that countries with a dense population in Southeast Asia, like India, Indonesia, Vietnam, and Thailand provide some of the most compelling evidence to date of the demographic dividend. The Blue Oceans of FinTech and economic growth in Southeast Asia are drawing investors' attention and posting a rapid growth rate. On the other hand, Hong Kong, Singapore, and Taiwan respectively licensed eight, five, and three local banks for digital banking, and is expected to be the next pivotal development of FinTech in the Asia-Pacific region. If the operation is successful, its experience will bring more FinTech investments and business opportunities to the Asia-Pacific region.

台灣正逐步前進但仍待突破

在業者與政府的努力之下，台灣去年行動支付的使用比例明顯上升，帶動使用場域、年齡、頻率及消費金額的增加；網路銀行、智能客服、理財機器人等新服務也幾乎成為金融機構的基本配備。這些都顯見民眾對於便利的新服務、金融科技的新概念接受度逐漸提高，大型金控近年更是動作頻頻，各自成立客戶體驗、數據分析等專責單位，交出不錯成績單。政府在 API 開放、個資保護、證券型代幣 (STO) 等政策做出鬆綁與調整，今年純網銀的開業也相當令人期待，後續 5G 環境建置到位後，業者可提供更多高品質及創新的服務。整體來看台灣的 FinTech 正在逐步前進，但步伐與其他國家的發展與規模相比，仍有進步空間。

例如法規的鬆綁與開放，個資法空有法規但難以實踐，消費者不知如何使用自己的權利，擔心個資外流；業者深怕踩到紅線，發展綁手綁腳，導致雙方都抱持疑慮。另一個挑戰，是台灣科技能量偏向硬體，缺乏大型科技軟體公司帶動發展，新創金融科技公司規模小且不熟金融法規，故冀望大型金融機構多與新創金融科技公司合作，例如純網銀就是一個金融業與非金融業合作的例子，將金融資源挹注到金融科技產業發展，打造更豐富的生態圈，也可對現有的金融服務產生更激烈的競爭。

台灣或許受限於市場規模與金融國際化程度，目前仍沒有大型新創 FinTech 獨角獸出現，但更重要的是台灣整體新創環境的建立以及相關人才的育留。政府單位若能多傾聽新創業者意見，提供良好友善的新創環境，大膽做出改革與開放。或許可以培養更多受國際市場矚目的新創業者，帶動台灣整體 FinTech 的產業發展與商機，一掃過去無法明顯突破的困境感。



刊物重點整理

Publication Highlights

FinTech 發展領域相當多元，根據世界經濟論壇分類，將 FinTech 分類為支付、保險、存貸、籌資，投資管理以及數據分析等六大領域。本刊物因應台灣發展現況，在此基礎上進行調整，分別提出，KYC 身分驗證、支付、資本市場與財富管理、財經素養與一般性議題、客戶參與、監管科技、保險科技、普惠金融，以及在各面向多次被提出的共同討論議題，總共九大面向，作為此次關鍵問題的討論面向。

- **共同討論議題，是各面向被多次提出討論的問題**

是否有金融科技及個人資料保護的專責主管機關、個人資料的權利義務與相關業務開放，都是消費者及業者共同關心的議題。良好的客戶體驗是未來成功的關鍵，消費者期待政府及業者透過政策和技術，提供更簡便、快速的身分驗證方式及資訊服務平台。業者則是希望政府透過各式風險分級管理，給予創新業務開放更好的發展環境與彈性空間，並建立雙方政策溝通平台。

- **KYC 身分驗證與監管科技偏向身分驗證與監管，是主管機關最在意的風險控管**

個資的權利是否明確落實、責任歸屬如何區分、認證程序之數位化與資料系統整合便利性。政府如何協助中小型業者導入監管科技、徵信及風險資料庫的建置與串接使用。

- **支付與保險科技則是應用場景範圍大，與民眾生活最相關貼切**

如何進行支付工具與系統的整合與保持競爭、開放行動支付的資安風險控管與便利性之間的取舍。法規對保險科技或商品的開放、是否有相關政策協助保險跨產業的資料串接及整合。

- **資本市場與財富管理、普惠金融是探討籌資與借貸等相關議題**

理財機器人的風險控管及規範制度、新型態的籌資方式，需要哪些相關法規的配合。如何改善弱勢族群的金融服務環境、政府如何協助新創企業、新型態服務的營運成長。

- **財經素養與一般性議題、客戶參與是想了解民眾對金融科技認知程度以及實際體驗上的痛點**

從教育和市場同時進行金融知識、信用管理的相關推廣，Open API、Open Banking、TSP 業者之間的管理、風控、責任歸屬議題。全面檢視與客戶的接觸點，改善客戶體驗、如何鼓勵、協助新創業者與民眾相互交流、認識。

FinTech's development field is quite diverse. According to the World Economic Forum classification, FinTech is classified into six major fields: payment, insurance, deposit and loan, financing, investment management, and data analysis. In accordance with the current situation of FinTech development in Taiwan, this publication adjusts the base and proposes 9 topics, including Topics of Joint Discussion, KYC (Know Your Customer), Identity Authentication, Payment, Capital Markets and Wealth Management, Financial Literacy and General Issues, Customer Participation, Regulatory Technology, Insurance Technology, and Inclusive Finance as key issues of this discussion.

- **Topics of joint discussion are issues that have been repeatedly discussed**

The highlights include whether there is a special regulatory authority for the protection of FinTech and personal data, the rights and obligations of personal data, and the opening of related businesses, which are all issues of common concern to consumers and the participants. A good customer experiencing is the key to future success, and consumers expect the government and participants provide easier and faster identity verification methods and information service platforms through policies and technologies. The participants hope that the government will open up a better development environment and a flexible space for innovative business through various types of risk management, and establish policy communication platform for both parties.

- **KYC Identity Authentication and Regulatory Technology are biased towards identity verification and regulation, which are the risk control and the most concerned portion to the regulatory authority**

The highlight is whether the rights of personal data are clearly implemented, how to clarify responsibilities, the digitization of certification procedures, and the convenience of data system integration; how the government will assist small and medium-sized enterprises in construction and introducing regulatory technology, credit information, and risk database with real-time streaming process.

- **Payment and Insurance Technology are applied to a wide range of application scenarios, which are the most relevant to people's lives.**

The highlight is how to integrate payment tools and systems, maintain the competitiveness, and strike a balance between the security risk control and convenience of the opened mobile payment; whether regulations are opened to insurance technology or insurance products ties up with relevant policies to boost cross-industry information streaming and integration.

- **Capital Markets, Wealth Management, and Inclusive Finance discuss related issues such as financing and lending.**

The highlights are the risk control and standardization of Robo-Advisors, new-style financing methods, what relevant laws and regulations are needed, how to improve the financial service environment for vulnerable groups, and how the government assists startups and new-type services in growth.

- **Financial Literacy and General Issues as well as Customer Participation are to realize the public's awareness of FinTech and the pain points in their experience.**

The highlights are the promotion of financial knowledge and credit management from education, management, risk control, and attribution issues among Open API, Open Banking, and TSP operators. They also include a comprehensive review and customer contact points to improve customer experiencing as well as how to assist startups in their communication with the public.

九大面向顏色系統與圖示 Color system and icons for each issue

0 1 2 3 4 5 6 7 8



0 共同討論議題
Topics of Joint Discussion



1 KYC 身份驗證
KYC Identity Authentication



2 支付
Payment



3 資本市場與財富管理
Capital Markets and
Wealth Management



4 財經素養與一般性議題
Financial Literacy and
General Issues



5 客戶參與
Customer participation



6 監理科技
Regulatory Technology



7 保險科技
Insurance Technology



8 普惠金融
Inclusive Finance



0 共同討論議題 Topics of Joint Discussion

共同討論議題是在本次論壇中多次被提出討論的問題，共有 6 題。重點包括：是否有金融科技及個人資料保護的專責主管機關、個人資料的權利義務與相關業務開放，都是消費者及業者共同關心的議題；良好的客戶體驗是未來成功的關鍵，消費者期待政府及業者透過政策和技術，提供更簡便、快速的身分驗證方式及資訊服務平台；業者則是希望政府透過各式風險分級管理，給予創新業務開放更好的發展環境與彈性空間，並建立雙方政策溝通平台。

Topics of joint discussion are issues that have been raised and discussed many times in this forum, with a total of 6 topics. The highlights include whether there is a special regulatory authority for the protection of FinTech and personal data, the rights and obligations of personal data, and the opening of related businesses, which are issues of common concern to consumers and participants. A good customer experiencing is the key to future success, and consumers expect the government and participants to provide easier and faster identity verification methods and information service platforms through policies and technologies. The participants hope that the government will open up a better development environment and flexible space for innovative businesses through various types of risk management and establish a policy communication platform for both parties.

01

Question

金融科技業的主管機關尚未明定，若能明確主管機關，更可加速推動相關配套發展措施以及必要的管理原則。

Perspectives

目前協助籌資之金融科技發展相當多元，如群眾募資、代幣籌資、P2P(Peer-to-Peer) 借貸等都是新興管道，但目前只有股權群眾募資及首次代幣發行 (Initial Coin Offering, ICO)，由金融監督管理委員會擔任主管機關，其他業務或技術尚無明確權責單位，易造成民眾與業者的觀望和擔心。建議可以參考主流國家作法，如英國以 FCA(Financial Conduct Authority) 為所有金融相關產業之主管機關，頒布相關管理辦法，以促進產業在主管機關的監督與管理下能夠順利發展，不僅可以提高金融科技業者的服務品質，更可增加民眾對於金融科技等創新服務的信任感。

02

Question

政府如何整合官方與民間的力量，透過創新孵化器、加速器等輔導資源，扶植更多元的金融科技創新業者成長？



Perspectives

目前由金融監督管理委員會、台灣金融服務業聯合總會、資訊工業策進會所共同推動的金融科技創新加速器「金融科技創新基地 FinTechBase」，提供金融科技新創事業一站式輔導資源，以及金融產業與跨域業者合作共創之數位與實體環境。希望藉由政府提供部分營運資金以及各項環節的完善，提高新創公司生存的機會。建議主管機關應以更優渥的條件、更開放的資格審查、提高相關預算與補助，來鼓勵新創業者參與孵化，並可借鏡國外大型孵化中心之設置及服務作為未來優化之參考，打造良好的創業環境與空間，避免台灣的金融科技人才外流。

01

Question

The regulatory authority of the FinTech industry has not yet been clarified. If it can be clarified, relevant supporting measures and necessary management principles can be promoted more rapidly.



Perspectives

At present, the development of FinTech to assist fundraising is quite diverse, including crowdfunding, token fundraising and P2P lending. However, currently only equity crowdfunding and ICO (Initial Coin Offering) are ruled by the Financial Supervisory Commission, R.O.C., while all other channels lack a confirmed authority. This will create doubt and hesitation among both users and corporate clients. Further referral to the practices of mainstream countries is suggested. For example, the FCA (Financial Conduct Authority) is the regulatory authority for all financial-related industries in the UK and promulgates relevant management laws to promote the smooth development of industries under the supervision and management of said authority, which can not only improve FinTech service quality but also can increase the public's trust in innovative services such as FinTech.

02

Question

How can the government integrate their power with the people to support more diverse financial technology innovation companies through innovation incubators, accelerators, and other counseling resources?

Perspectives

The FinTechBase, the FinTech innovation accelerator currently promoted by the Financial Supervisory Commission, Taiwan Financial Services Roundtable, and the Institute for Information Industry, provides one-stop counseling resources for FinTech startups, as well as cooperation between the financial industry and cross-domain players in the digital and physical environment. It is hoped that the government provides part of the working capital and complete links to boost the survival chances of startups. It is recommended that the regulatory authority should encourage startups to participate in the incubation by the provision of better conditions, more open qualification review, as well as more budget and subsidies. The establishment of foreign incubation centers and services should be the reference for future optimization. Create a good entrepreneurial environment to avoid the FinTech talent outflow in Taiwan.

03

Question

未來民眾可使數位身分證，快速接洽政府部門相關業務與資料。是否也應同時推動全國通行之數位認證機制，統一作業方式和認證工具，並運用至金融科技服務，以減少各家業者各自為政。

Perspectives

政府今年預計推出的新版數位身分證，除將駕照、健保卡等證件進行結合外，未來民眾使用一張數位身分證即可洽接公部門服務及資料。需要使用身分證辦理的業務，例如報稅、申請津貼與補助等都可在線上辦理，省下親自辦理的時間，讓政府單位無紙化且提升作業效率。建議也應該同時推動全國通行之數位認證機制，如數位身分證作為數位核身之基礎，讓消費者未來在申請或使用相關金融科技服務時，僅需一張卡片即可完成動作，提升便利性。

04

Question

台灣的個人資料保護法歷經多次修改與調整，民眾對於自己的權利不甚了解，主管機關如何因應，並進行推廣與教育？



Perspectives

現今社會大眾對於個人資料的保護意識抬頭，主管機關近年來也針對個人資料保護法進行多次修改，加上因應歐盟一般資料保護規範 (General Data Protection Regulation, GDPR) 制度推行，個資保護的規範更趨複雜及嚴謹，企業也增加相關管理規範與成本進行因應，深怕違規面臨高額罰款與刑責。但因被遺忘權、拒絕使用權、可攜帶權等權利的規範不足，導致民眾對自己的權利似懂非懂，不知該如何正確使用個資法。只要沒發生損失就輕輕放過或者不知如何求助，也可能造成過度解釋法規，導致業者與主管機關疲於應付爭議案件。主管機關該如何因應，並進行推廣、說明與教育，以提升民眾對個資法的認知？

03

Question

In the future, the public can use the government-issued digital ID to quickly access relevant government businesses and information. Perhaps it is also necessary to promote a nationwide digital authentication mechanism, confirm a unified operating method and authentication tools, and apply it to FinTech services, so as to reduce the number of individual companies using their own certificates or authentication methods.

Perspectives

In addition to combining driver's licenses, health insurance cards, and identify cards, the government expects to launch a new version of the digital ID card this year. In the future, the public can use a digital ID card to contact public services and information. Businesses that need to use ID cards, such as tax filing, applying for subsidies and grants, can all be processed online, saving time for on-site processing and allowing the government to become paperless, thus improving operational efficiency. At the same time, it should also promote the national digital authentication mechanism, such as using digital ID cards as the basis of verification, so that consumers can apply for or use related FinTech services in the future via one digital ID card to improve convenience.

04

Question

Taiwan's personal data protection law has undergone many revisions and adjustments, and because of this, the people are unfamiliar with their rights. How can the regulatory authorities help promote and educate them?

Perspectives

Nowadays, the public's awareness of the protection of personal data is on the rise. In recent years, the regulatory authority has also revised the Personal Data Act several times. In addition, in accordance with the implementation of the EU's GDPR (General Data Protection Regulation) system, the regulations on the Personal Data Act have become more complicated and rigorous. Enterprises are also increasing expenses on personal data management to avoid high fines and criminal liability. However, the right to be forgotten, the right to refuse to use, the right to portability and other rights are insufficiently regulated. Hence, people don't have a concrete understanding of their own rights, and they don't know how to comply with the Personal Data Act properly. If there is no loss, they easily let it go or don't know how to ask for help. It may also cause excessive interpretation of regulations, resulting in continuous disputes between the client and the regulatory authority. How should the competent authority carry out promotion, explanation, and education to raise the public's awareness of the Personal Data Act?

05

Question

消費者資料權、開放銀行相關措施管理尚未立法，目前仍由金融業者單向訂定規則，如何確保真正達成促進資料的自由流通，尊重消費者意志？



Perspectives

開放銀行 (Open Banking) 是指金融業者與第三方服務業者 (Third-party Service Providers, TSP) 合作，透過開放應用程式介面 (Open Application Programming Interface, Open API) 將金融機構原有的數據資料提供給 TSP 業者串接以提供更多服務。但目前消費者資料權尚未明文立法，相關委外規則之所需資料，仍由金融業者主導單向訂定規則。如此做法，不僅無法降低金融科技業者所面臨消費者資料權被傳統金融業者把持的現況，可能造成消費者無法依其自主意志，自由移轉、流通與使用消費者資料的權利。

06

Question

面對各式新興科技議題，政府是否可以與民間新創業者建立一個固定的溝通平台或管道，讓雙方共同討論問題與解決方式，讓法制規範與創新發展取得平衡？

Perspectives

以支付為例，不論是身分驗證或是金融帳戶、信用卡等資訊，皆涉及大量資訊傳遞與個人隱私，如何做好資安與管控問題是業者與消費者共同面對的一大挑戰。關於新興科技之個資保護、詐騙與洗錢防範等安全性議題的疑慮，是否能建構一個溝通平台，讓政府各部會、專家學者、新創業者等皆能提出問題與解決方式。讓資訊更加透明與流通，在各方需求、顧慮與創新作法中取得一個平衡點，讓法規制定與管理規範一起跟上，達到不會限制新科技的發展，又能防範資安問題的雙贏目標。

05

Question

Consumer data rights and management of open banking related measures have not yet been legislated. At present, financial institutions still dominate and stipulate regulations. How can we ensure that the free flow of data is truly promoted and the will of consumers is respected?

Perspectives

Open Banking refers to the cooperation between financial providers and TSPs (Third-party Service Providers) to provide the original data of financial institutions through the Open Application Programming Interface (Open API) to provide more services. However, at present, the consumer data right has not been legislated explicitly, and the information required in the relevant outsourcing rules is still dictated by financial providers; this approach not only cannot reduce the situation where the consumer data right is dominated by traditional financial industries, but it also results in consumers being unable to freely transfer, circulate, and use consumer data in accordance with their own will.

06

Question

Facing various emerging technology issues, can the government establish a fixed communication platform or channel with private entrepreneurs to allow discussion of problems and solutions, so as to achieve a balance between legal regulations and innovative development?



Perspectives

Taking the payment process as an example, whether it be identity verification, financial account, or credit card information, there involves a large amount of information transmission and private content. How to defend information security and risk control is a major challenge to participants and consumers. Regarding security concerns of emerging technologies, such as personal asset protection, fraud and money laundering prevention, can we build a communication platform that allows government ministries, experts and scholars, new entrepreneurs, etc. to ask questions and provide solutions? Make information circulation more transparent to achieve a balance in the needs, concerns and innovations of all parties, and to keep up with the development of laws and regulations. This will create a system that does not restrict new technology development and defends the information security to reach a win-win situation.





1 KYC 身分驗證

KYC Identity Authentication

KYC(Know Your Customer) 認識你的客戶，是企業確認客戶身分的程序，進行客戶身分盡職審查，現在也多衍伸風險控管、客戶行為分析、個資保護等議題，本面向共有 13 題。問題重點包括：消費者的個資保護、個資流向議題，風險責任如何歸屬，是否有專屬主管機關出面負責；認證程序之數位化與資料整合系統之需求提升，是否由政府或統一機構負責整合，提升便利度；新技術運用於身分驗證的管理與規範。

KYC (Know Your Customer) is the procedure for the enterprise to verify the customer's identity and process customer due diligence. At present, many issues such as risk control, customer behavior analysis, and personal data protection are derived. There are 13 issues in this topic. The key issues include the consumers' personal data protection, the discussion about personal data flows, which party should account for the risk, whether there is a dedicated authority to take responsibility, whether the government or a unified agency is responsible for integration and digitalization of verification procedures, the need for data integration systems increasing to improve convenience, and the management and regulations for new technologies applied to identity verification.

07

Question

消費者辦理金融服務時，各家業者的身分驗證機制耗時且不統一，是否可由政府統一進行資料整合及驗證的機制推廣？例如全面引用數位身分證，使消費者不必管理過多憑證或密碼，提升便利性。

Perspectives

每家金融業者都有自己的 KYC(Know Your Customer) 政策，除了主管機關的要求以外，所需徵提的資料也不盡相同。消費者若是與不同金融業者辦理業務，都必須重新進行註冊上傳資料等程序，相當費力費時。是否能由政府單位主導，訂定統一的 KYC 資料格式及驗證機制，例如運用數位身分證進行驗證，避免客戶耗費冗長時間進行申請程序，提升使用便利性。

08

Question

現行 KYC 所需相關驗證工具、身分證明文件及檢驗流程，如何在安全與消費者便利之間取得平衡？



Perspectives

現行 KYC 所需相關驗證工具、身分證明文件及檢驗流程，皆從符合相關法律及規定之角度出發，以風險控管的安全為優先考量。非依消費者使用經驗角度思考，無法兼顧使用便利性，導致消費者在申請服務時，常有步驟繁瑣、打擾消費者的聲音出現。主管機關與業者都應該思考，如何在安全與消費者便利之間取得平衡，制度是否有調整空間，有無其他更有效率的工具，來改善消費者在 KYC 時的體驗流暢度。

07

Question

When consumers handle financial services, the identity verification mechanism of each business operator is time-consuming and not universal. Can the government promote the mechanism of data integration and verification in a unified manner? For example, fully implementing digital ID cards so that consumers do not have to manage too many passwords?

Perspectives

Each financial institution has its own KYC (Know Your Customer) policy. In addition to the requirements from the regulatory authority, the other required information is also similar. If consumers are dealing with businesses from different financial institutions, they must go through tedious re-registration procedures such as uploading information. Perhaps this can be led by a government unit to stipulate an unified KYC data format and verification mechanism. For example, implementing the use of digital ID cards for authentication, which avoids the time-consuming application process and improves overall convenience.

08

Question

How does the relevant verification tools, identity documents, and inspection process required by the current KYC strike a balance between safety and convenience for consumers?

Perspectives

The relevant verification tools, identity documents, and inspection processes required by the current KYC are all based on compliance with Taiwan's relevant laws and regulations which takes safety and risk control as the first consideration. They are not designed based on consumer experience and do not take convenience into account. Both the regulatory authority and participants should think about how to strike a balance between safety and convenience for consumers. Whether there is room for adjustment or whether there are other more efficient tools to improve the smoothness of consumers' KYC experience.

09

Question

政府是否可以強化消費者的個人資料掌握權，藉由透明化的機制可以讓消費者查詢個人資料的流向？



Perspectives

以澳洲的消費者資料權 (Consumer Data Right) 為例，消費者擁有並可控制管理自己的個人數據，並要求處理資料的業者，必須通知消費者有關個資的處理運用狀況。但台灣消費者為了申請或使用服務，將個人資料提供給金融服務業者後，卻無從得知自己授權的資料會流向何處、有誰看過以及有誰具有權力使用與處理這筆資料。政府是否能有一個透明的機制讓消費者查詢個人資料的流向，讓消費者明確知道個人資料被使用到何處，建議可以參考國外案例進行修法調整，避免業者用一句「已同意授權使用」來涵蓋全部。

10

Question

政府單位是否應成立專責的個人資料保護主管機關，進行相關跨部門業務的整合及管理，達到政策的一致性以及減少資源浪費？

Perspectives

目前台灣的個人資料管理是由各目的事業主管機關個別管制，如金融資料歸金融監督管理委員會、企業資料歸經濟部、勞動資料歸勞動部、健保資料歸衛生福利部。但隨著金融科技帶來新型態的商業模式，跨領域服務愈來愈普遍，造成民眾若發生跨領域的個資爭議時，不知道要找哪個主管機關負責的情況。個人資料不只是法律層面，還涉及資訊安全、標準規格、認證使用以及與產業介接等議題。因此政府單位是否應成立專責的個資保護主管機關，進行相關跨部門業務的整合及管理，達到政策的一致性以及減少資源浪費。

09

Question

Does the government have a transparent mechanism for consumers to check the flow of personal data?

Perspectives

In order to apply or use services, consumers provide information to financial service providers. However, they have no way of knowing where their authorized data will flow, who has seen it, and who has the right to use and process this data. Perhaps the government can have a transparent mechanism for consumers to inquire about the flow of personal data, and continue to let consumers know where personal data are used. This will help services avoid using the phrase "has agreed to authorize the use" to cover all aspects of personal data.

10

Question

Should a government establish a personal data protection authority to integrate and manage related cross-departmental businesses to achieve policy consistency and reduce resource waste?



Perspectives

At present, the management of personal data in Taiwan is individually controlled by several national bodies. For example, the financial information is controlled by the Financial Supervisory Commission, the enterprise information by the Ministry of Economic Affairs, the labor information by the Ministry of Labor, and the health insurance information by the Ministry of Health and Welfare. However, as financial technology brings a new type of business model, cross-disciplinary services are becoming more and more common. Because of this, the public does not necessarily know which authority figures to hold responsible when faced with certain cross-disciplinary personal data disputes. Personal data is not only a legal issue, but is also related to information security, standard specifications, certifications, use and interfacing with industries, etc. Therefore, the government should establish a dedicated personal data protection authority to integrate and manage related cross-sector businesses in order to achieve overall consistency and reduce resource waste.

11

Question

雖然主管機關已有規定，若消費者表明拒絕繼續接到行銷訊息，業者應立即停止，但實際上過度行銷的情況仍常會發生，是否有更完善的做法？

Perspectives

消費者使用或註冊服務時，常會遇到綑綁式同意的共同行銷條款，無法選擇性的、部分的給予個資使用權；若不勾選「同意」則無法繼續或完成流程的作法令消費者感到不舒服；又或者完成相關註冊服務後，接到廣告、推銷電話、簡訊、電子郵件打擾。雖然主管機關已有規定，若消費者表明拒絕繼續接到行銷訊息，業者應立即停止，但實際上過度行銷的情況仍常會發生。主管機關對於此種強迫同意推銷及使用個資的行銷方法是否能提出更完善的作法，加上提供金融服務的新創業者數量也不斷增加，是否也應將此新興業者一併納入管理。

12

Question

基於整體市場的風險控管，是否可以開放獲得認證授權的金融科技業者，查詢消費者留存於金融聯合徵信中心的資料以及信用評等紀錄？



Perspectives

由於目前金融聯合徵信中心的消費者資料及信用評等紀錄主要只提供給金融機構，消費者或可申請、查詢到少部份資料，但內容不完整而且流程繁瑣不便。基於整體市場風險控管，有從事相關業務就應該要進行對等的信用審查，而目前的金融科技業者卻因無法取得資料，造成風險控管不足。是否可由主管機關進行金融科技業者的資格審核，開放金融聯合徵信中心全面資料給消費者以及獲得認證授權的金融科技業者，提供即時查詢甚至提醒等更多服務功能。

11

Question

After the financial operator obtains personal data, it often brings in excessive marketing. Can the regulatory authority propose a better approach?



Perspectives

When consumers use the service or register, they will often encounter the common terms of consent. They are forced to agree with the use of personal data, or else they cannot continue or complete the process which is quite annoying to consumers. Which is why, after completing the relevant registration services, you will always receive notifications of advertisements, marketing calls, SMS marketing and emails. Although the regulatory authority has stipulated that if consumers indicate that they refuse to continue to receive marketing messages, the operators should immediately stop. In reality, the excessive marketing often continues to occur. The regulatory authority could put forward a more complete approach to such compulsory marketing methods and the use of personal data. Also, with the number of FinTech startups that provide financial services also increasing, should these FinTech startups also follow the same regulations?

12

Question

Based on overall market risk control, is it possible to open authentication and authorization for FinTech companies to inquire about the information and credit rating records that consumers have left in the Joint Credit Information Center?

Perspectives

Since consumer information and credit rating records of the Joint Credit Information Center are usually only provided to financial institutions, and while consumers may apply for a small amount of information, the content is incomplete and the process is cumbersome and inconvenient. Based on the overall market risk control, if you are engaged in a certain business, you should conduct relevant credit review. However, the current FinTech participants are unable to obtain information, resulting in insufficient risk control. Is it possible for the regulatory authority to carry out the qualification review for FinTech participants and open the comprehensive information of the Joint Credit Information Center to consumers and FinTech participants through certification and authorization to provide more services and functions, such as instant inquiry and even reminders?

13

Question

業者使用的技術不斷推陳出新，對於各種創新技術的發展，主管機關是否能有即時且對應的規範或管理辦法？

Perspectives

KYC 驗證已為消費者取得金融服務的必要過程，也是相關業者了解消費者的重要管道。為了減少身分驗證流程的不便，業者使用的技術不斷推陳出新，經由各種新技術來提升 KYC 的作業效率。但目前並非每種技術運用的服務都有完整規範，主管機關對於規範或管理辦法是否能跟上新技術的發展。若政府無法即時給予引導及協助，可能會減少業者投資新技術的意願。

14

Question

目前的各家金融機構資料庫沒有串聯，政府如何解決民眾變更個人資料時的不便，以及業者資料未能及時更新的空窗期問題？



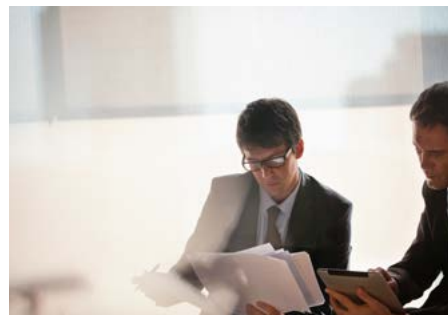
Perspectives

大部分消費者同時是多家金融機構的客戶，當有變更資料的需求時，例如居住地址、連絡電話、姓名等，必須到每家不同的金融機構做資料更新。就算更改的資料是相同項目與內容，也只能一家一家進行變更，這對顧客來說是極為繁瑣、冗長不便的過程。若消費者沒有更新資料的意願，業者也無法強迫更新，只能一直使用舊資料，產生資料的空窗期。因此政府是否有辦法能夠解決這個對雙方都很困擾的議題，讓變更資料的過程更加快速便利。

13

Question

The technology used by the industry is constantly being updated. Can the regulatory authority have corresponding regulations or management methods for the development of various innovative technologies?



Perspectives

KYC verification has been a necessary process for consumers to obtain financial services, and it is also an important channel for relevant financial operators to understand consumers. In order to reduce the inconvenience of the identity verification process, new technologies are released constantly for providers to enhance the efficiency of KYC's operations. However, at present, not every technology application service has complete regulations. Can the competent authority keep up with the development of new technologies with regard to regulations or management methods? If the government fails to provide immediate guidance and assistance, it may reduce the willingness of the participants to invest in new technologies.

14

Question

At present, the databases of various financial institutions are not connected in series. How does the government solve the public's inconvenience when changing their personal data as well as regarding the problem of the period in which the participants' information is not updated in time?

Perspectives

Most consumers are customers of multiple financial institutions at the same time, and when there is a need to change their personal data, such as residential address, contact number and name, they must go to each different financial institution to update their information. Even if the changed information is the same item and content, this tedious process is the only way to make changes in each financial institution. If consumers do not have the desire to update the data, and the participants cannot force the update, they can only use the old data, resulting in a data-lacking window. Is there any way for the government to solve this issue that is bothering both sides and make the process of changing information faster and more convenient?

15

Question

對於 KYC 繁瑣的步驟，客戶常會有不耐煩的聲音，業者是否應善盡與客戶的責任，以增加消費者對於 KYC 驗證過程的信任？

Perspectives

消費者在申請開戶或是購買金融商品的過程當中，必須花費許多的時間與金融服務業者確認 KYC 內容，執行過程相當繁瑣，容易使消費者不耐煩甚至不願執行相關手續。但在法令規定之下，KYC 驗證已為消費者取得金融服務的必要過程，也是業者了解消費者的重要管道。業者是否應善盡溝通之責任，與消費者充分溝通並取得信任，讓其了解 KYC 驗證的重要性。如此除了降低業者本身的風險，同時也是保護消費者的權益，降低盜用、詐騙之風險。

16

Question

利用人臉或指紋辨識的身分驗證技術逐漸成熟，但也出現侵犯個人隱私疑慮。目前法規及主管機關是否對於此技術運用定出明確的規範？



Perspectives

利用人臉或指紋辨識的身分驗證技術逐漸成熟，提供極大便利性及應用潛力與商機，使政府及業者開始提供以生物特徵為基礎的服務。或許其有助於維護社會秩序、提升公安，提供便捷效率的生活，但主管機關對此技術運用與個人資料侵犯之間的規範，應考量比例原則，合理權衡技術帶來的利弊。並應視應用領域制宜，儘快做出明確規範以及擔任監督職責，以利業者遵循發展。例如歐盟就擬在未來 5 年內，暫時禁止公共場合使用人臉辨識技術，期望藉此給予立法人員足夠的時間研擬並訂定法條規範。

15

Question

Regarding the cumbersome steps of KYC, customers are often impatient. Should service providers fulfill the responsibility of communicating with customers to increase consumers' trust in the KYC verification process?



Perspectives

The process for account application or financial product purchase is often lengthy for consumers, and even requires communication with financial operators to confirm the KYC content. The execution process may be quite cumbersome, making consumers impatient or unwilling to perform related formalities. However, in accordance with regulations, KYC verification is a necessary process for consumers to obtain financial services, and it is also an important channel for service providers to understand consumers. Therefore, participants must fully communicate with consumers and gain trust to let them understand the importance of KYC verification. In this way, in addition to reducing the risks of the participants themselves, they are also protecting the rights of consumers, reducing the risk of misappropriation and fraud and fulfilling communication responsibilities.

16

Question

While face and fingerprint identity verification technology is gradually maturing, there are doubts about Personal Data Protection Act breaches. Do the current regulations and authorities set clear specifications for the use of this technology?

Perspectives

With face or fingerprint recognition gradually maturing and providing greater convenience, application potential, and business opportunities, the government or participants can begin to provide biometric-based services, which may help maintain social order, improve public security, and provide more efficiency. However, the authority should consider the proportionality between the application of this technology and the infringement of the Personal Data Protection Act, reasonably weigh the advantages and disadvantages, and make clear specifications and take oversight duties accordingly so that participants can follow and develop. For example, the European Union plans to temporarily ban the use of face recognition technology in public places in the next five years, hoping to give legislators enough time to develop laws and regulations.

17

Question

KYC 需提供許多審查文件，如何藉由開放相關資料庫，協助消費者減少準備相關資料的程序？



Perspectives

消費者進行 KYC 時除須簽署許多文件外，也須提供相關證明資料作為審查，例如雙證件及信用證明。但現行制度下，非傳統金融機構無法調閱信用相關資料庫，導致消費者若要使用金融科技業者的服務，必須自行申請資料後再提供。如果不是網路族群使用者，只能透過郵件往來或親自前往相關單位申請，相當耗時費力；但若未提供相關資料，對業者所承受之風險也相對增加。因此是否有更好的辦法可以協助消費者減少準備 KYC 所需相關資料的程序，同時也可降低整體金融市場風險。

18

Question

區塊鏈強調匿名性及去中心化特色的技術運用，與 KYC 的審查精神有所衝突，對於相關產品或服務該如何落實 KYC？

Perspectives

區塊鏈技術透過分散式帳本技術，以類似點對點傳輸方式，將資訊透過各節點進行傳輸、交換、驗證及儲存。具有提供加密、難以被竄改、資訊公開透明、可隨時查詢等特性，以及無強制之中心機構，不易受特定國家、企業或組織所掌控，強調匿名性及去中心化等特色。近年來因主管機關加強洗錢防制力道，KYC 除了傳統的確認客戶身分以外，更有客戶審查及風險控管的意涵，例如對重要政治、經濟人物身分確認，如此對於區塊鏈相關的產品或服務與現行 KYC 精神有所衝突的情況之下，主管機關該如何落實 KYC 政策，避免產生監管漏洞。

17

Question

How to help consumers reduce the procedures for preparing relevant information required by KYC?

Perspectives

When conducting KYC, consumers must not only sign many documents, but also need to provide relevant certification materials for review, such as two forms of identification and credit certificates. However, under the current system, non-traditional financial institutions cannot access credit-related databases, meaning that consumers who want to use the services of FinTech participants must apply for the materials and provide them to FinTech participants. If you are not an Internet user, you can only apply by email or make on-site application, and then provide it to the startups, which is quite laborious. However, if no relevant information is provided, the risk to the startups will also increase. Perhaps there is a better way to help consumers reduce the procedures for preparing relevant information required by KYC and reduce the overall financial market risk at the same time.

18

Question

Blockchain emphasizes anonymity and the use of decentralized technology, which conflicts with the spirit of KYC's review. how should KYC policies for blockchain related products or services be implemented?



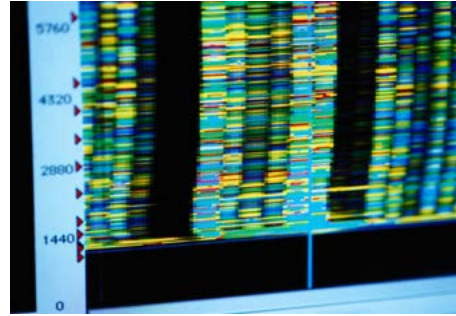
Perspectives

Blockchain technology uses a distributed ledger technology to transmit, exchange, verify, and store information through a peer-to-peer transmission method. It has encryption features, is difficult to be tampered with, and has open information that can be accessed at any time. The mandatory central agency is not easily controlled by a specific country, enterprise or organization. In recent years, the authorities have strengthened the prevention of money laundering. In addition to traditional confirmation of customer identity, KYC also has the ability for customer review and risk control, such as important political and economic figures Identity confirmation. In such a situation where the relevant products or services of the blockchain conflict with the current KYC spirit, how should the regulatory authority implement the KYC policy to avoid regulatory loopholes?

19

Question

如何讓提供金融服務的相關業者，能夠即時且有效的掌握客戶資料異動的情況，以便有效的控制風險？



Perspectives

以個人借貸為例，當客戶的還款能力出現問題時，金融機構必須經過一段未還款時間，等確定無法還款後再進入後續催收程序。如果能讓提供金融服務的相關業者，能夠即時且有效的掌握客戶資料異動的情況，將可以更有效的控制風險，由被動事後得知資訊，改為主動提前得到資訊。例如英國、歐盟等採開放銀行資料法及平台；澳洲做了消費者資料權，推動金融，電信，能源及其他產業數位交換平台 (Data61)，透過即時資料開放交換之機制，可以得知資料的異動情形。

19

Question

How can the relevant providers of financial services be able to immediately and effectively grasp the changes in customer information in order to effectively control risks?

Perspectives

Taking personal borrowing as an example, when there is a problem with the customer's solvency, the financial institution must go through a period of non-repayment and wait until it is determined that the payment cannot be made before entering the subsequent collection procedure. If the relevant financial service providers can get real-time customer data updates, they will be able to control risks more effectively. That is, the information is learned in advance instead of being informed passively. For example, the United Kingdom and the European Union have adopted the open banking data protection and platform; the Australian Government announced the introduction of a consumer data right (CDR) in Australia and promoted the personal details exchange platform (Data61) for finance, telecommunications, energy, and other industries. Through the mechanism of real-time open data exchange, financial service providers can learn about the data change situation.



2 支付 Payment

本面向主要討論關於非現金方式進行的支付，以及相關業者、平台、法規議題，共有 10 題。問題重點包括：如何進行支付工具與系統的整合與保持競爭，以提升使用效率；開放行動支付的風險控管與便利性之間的取捨，以及使用上的資安責任；政府是否有更多措施，來鼓勵中小型商家及消費者使用行動支付。

This topic is mainly for discussion about non-cash payments, as well as related businesses, platforms, and regulatory issues, with a total of 10 issues. The key issues include how to integrate payment tools and maintain competition in order to improve the efficiency of use, the trade-off between risk control and convenience of open mobile payment, the use of security responsibilities, as well as whether the government has more measures to encourage small and medium-sized enterprises and consumers to use mobile payments.

20

Question

國內電子支付系統眾多，且有跨系統移轉、共通標準整合以及國際接軌等問題，造成消費者選擇與使用上的困難，主管機關如何解決痛點以達到真正普及化？

Perspectives

國內支付系統眾多，常用各種促銷及優惠來擴大市佔率，或增加合作的銀行與商家，期望能佔據領導地位。就市場現狀來說，電子支付的普及性仍有進步空間，雖近年逐漸增加，但整體使用比例仍不夠高；其次，目前電子支付尚未有共通的標準或整合平台。各家系統使用方式不同，也無法跨系統移轉款項，造成消費者選擇與使用上的困難，光要理解不同系統之間的差異及操作就要花費許多心力。未來該採用何種共通標準，整合各家系統並同時與國際接軌，讓消費者與商家便於使用，提升使用體驗與意願，達到真正的普及化。

21

Question

部分國家開始對於數位法定貨幣積極進行試驗及推廣，台灣主管機關未來是否有類似的政策準備，以提早因應？



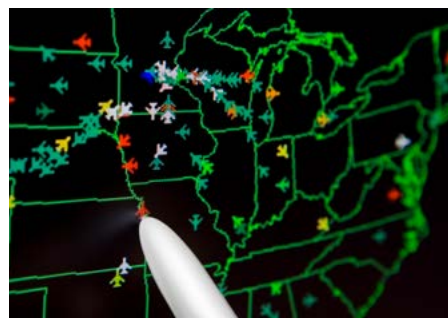
Perspectives

部分國家的行動支付發展全面且普及，對於推動數位貨幣建立穩固的基礎，例如中國人民銀行預計推出官方背書、具法償性的數位人民幣，希望能等量替代流通的法定現幣。其對數位人民幣的目標包括，作為金融機構的清算、零售系統的應用、供國際金融跨境支付與匯款。希望藉由數位人民幣，加強人民幣流通性、增加人民幣在國際間的影響力，甚至預先對抗其他的非官方數位貨幣。面對部分國家積極推廣數位貨幣，中央銀行未來是否有類似的貨幣與財政政策準備，以提早因應。

20

Question

How can payment systems in Taiwan solve the problems of cross-system transfer, common standard integration, and international integration among many domestic electronic payment systems to achieve mass-adoption?



Perspectives

There are many payment systems in Taiwan, and various promotions are often used to increase market share or increase the cooperation of banks and merchants to occupy a leading position. As far as the current market situation is concerned: First, while it has been gradually increasing in recent years, the popularity of electronic payment is not high enough, whether it is the manufacturer or consumer side. Second, at present, there is no common standard or a large integrated platform for electronic payment. Different ways are adopted by different participants. Hence, the transfer of money across the system cannot be made, which makes it difficult for consumers to use it. It takes a lot of effort to understand the differences and operations between each system. In the future, what common standards should be adopted to integrate various systems and be in line with international standards at the same time, so that consumers and merchants can facilitate cross-border use, enhance the user experience and willingness to join, and achieve mass-adoption?

21

Question

Some countries are actively promoting digital fiat currency. Will Taiwan have similar policy preparations in the future to respond early?

Perspectives

Mobile payment development in some countries is comprehensive and popular, which is a solid foundation for promoting digital currencies. For example, the People's Bank of China is expected to launch an official endorsement and forensic digital RMB, hoping to replace the equal amount of fiat currency in circulation. Its goals for digital RMB include application of clearing and retail system in financial institutions and international financial cross-border payment and remittances. It is hoped that digital RMB will strengthen the RMB circulation and the influence internationally and even confront other unofficial digital currencies in advance. Facing the PBOC's promotion of digital fiat currencies, will the Central Bank of Taiwan have similar monetary and fiscal policy preparations in the future to respond early?

22

Question

部分消費者願意多承擔一些風險來換取支付便利性，主管機關對於風險控管與支付便利性之間的取捨該如何拿捏？

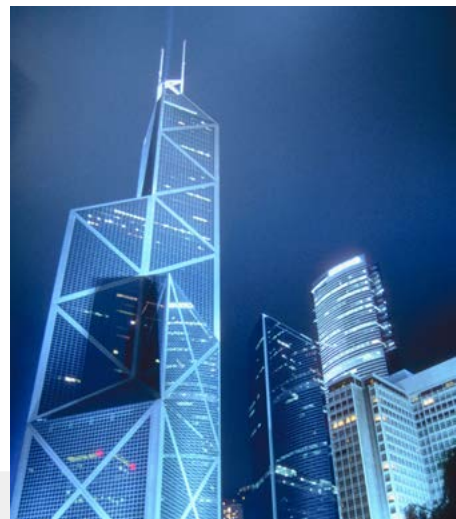
Perspectives

對於電子支付的法規，主管機關現行主要依據《電子支付機構管理條例》進行管理，該條例嚴格規定了各類型交易的金額限制，例如每月儲值、收付上限等。雖然能加強對交易風險的控管，但相對也犧牲了支付的便利性，而對於兩者間該如何取捨與拿捏，是目前面臨的一大難題。部分消費者對於小額交易，願意多承擔一些風險來換取支付便利性，認為若是金額小且在風險可承受的範圍內，政府或業者應該盡量開放服務，不僅能提升交易效率，也能增加使用者體驗，同時吸引更多客戶。

23

Question

隨著跨國換匯或跨境支付的需求發展，政策的開放與風險控管怎麼做到更好？



Perspectives

隨著科技發展與全球化的趨勢，旅遊換匯與跨境支付的需求也越來越大，因此吸引業者開始推出線上或手機 APP 換匯的服務。然而業者該如何進行新興科技的應用，在提供消費者良好使用體驗的同時又能達到風險的控管，便是一大議題。例如換匯與跨境支付最大的疑慮，便是可能有地下匯兌的洗錢防制議題產生，主管機關目前政策仍只留在金融業特許經營相關業務，來降低洗錢風險，與主流國家政策走向鼓勵金融科技新創業者進行之方式大不相同。這部份如何能有全面思考，並提出支持各種經濟活動的金融科技政策。

22

Question

Some consumers are willing to take more risks in exchange for payment convenience. How should the regulatory authority strike a balance between risk control and payment convenience?



Perspectives

The current regulations on electronic payment are mainly based on the "The Act Governing Electronic Payment Institutions", which strictly stipulates the amount limits for various types of transactions (monthly stored value, upper limit of payment etc.). Although it can strengthen the control of transaction risks, it also relatively sacrifices the convenience of payment, and the choice between the two is currently a major problem. Some consumers are willing to take more risks in exchange for payment convenience for small transactions, so they believe that if the amount is small and the risk is within the tolerance range, the government or participants should open the service up as much as possible, which can not only improve transaction efficiency, but also increase user experience and attract more customers.

23

Question

With the development of cross-border foreign exchange or cross-border payment, how can opening-up policies and risk control be improved?

Perspectives

With the development of technology and the trend of globalization, the demand for cross-border foreign exchange and cross-border payment is also increasing. Therefore, participants are attracted to release online foreign exchange service or foreign exchange APPs for mobile phones. However, it is a major issue for participants to provide consumers with a good user experience by applying emerging technologies and achieve risk control at the same time. For example, the biggest doubt about foreign exchange and cross-border payment is that there may be underground money laundering issues. The current policy of the regulatory authority is still only reserved for financial services franchises to reduce the risk of money laundering which is quite different from encouraging FinTech startups to develop toward mainstream countries. How can we think about this part comprehensively and propose fintech policies that support various economic activities?

24

Question

市面上的支付業者越來越多，如何協助消費者在使用場景當中，以最有效率的方式找到最適合的支付工具？

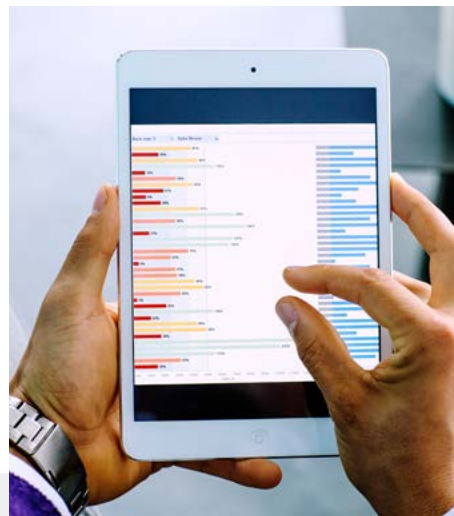
Perspectives

現在國內市場上支付業者眾多，也不斷有新加入的競爭者，推出各式優惠與活動，希望能吸引消費者使用。對於消費者來說，面對眾多競爭者百家爭鳴的狀態，好處是可以針對不同場域、消費模式選擇對自己有利的支付工具。但也因為其使用方法或體驗上幾乎無特別突出之處，同時間太多選擇也容易讓消費者感到眼花撩亂，在付款當下需要快速抉擇使用哪個支付工具，可能導致錯失優惠或缺乏效率的狀況，又或者要提前花時間精力進行比較研究。是否能有方法，協助消費者在不同的使用場景中，快速挑選出最適合當下使用的支付工具呢？

25

Question

大額支付及小額支付是否有限定金額之標準，針對不同業務內容及使用頻率，主管機關如何進行差異性風險控管？



Perspectives

大額支付系統主要處理與金融市場活動有關之支付，例如與貨幣市場、證券市場或外匯市場交易有關之支付。小額零售支付系統主要處理經濟體系中個人或企業部門零售交易之價款收付，該類系統處理的交易種類繁多、金額較小，但主管機關並無對大額支付或小額支付限定一定金額標準。對於整體支付風險而言，大額支付當然比小額支付高，小額支付雖然金額小且風險性較低，卻是民眾使用最頻繁，涉及最多個資的方式。現行主管機關多以業務涉及內容來進行風險控管，但是相同是支付，十萬元的交易與一千元交易的風險顯然不同，主管機關如何進行差異性風險控管。

24

Question

There are more and more payment providers in markets; how can we find the most suitable payment tool for consumers in the most efficient way?



Perspectives

At present, there are many payment providers in the domestic market, as well as new competitors who are constantly giving special offers and holding activities, hoping to attract consumers. For consumers, facing the competition among payment providers, the advantage is that they can choose the payment tool that is beneficial to them for different scenarios and consumption patterns. However, because there are almost no special highlights in its usage or experience, and too many choices at the same time make consumers feel overwhelmed. Because consumers need to choose which payment tool to use immediately when paying, it may lead to missed offers or inefficiency. Perhaps spend time and energy in advance to conduct a comparative study: Is there a way to help consumers quickly select the payment tool that is most suitable for use in different application scenarios?

25

Question

Is there a standard for large and small payment amounts? How does the regulatory authority conduct differential risk control for different business contexts and frequency of use?

Perspectives

The large payment system mainly deals with payments related to financial market activities, such as payments related to transactions in the money market, securities market, or foreign exchange market. The retail payment system mainly deals with the receipts and payments of retail transactions in the economic system for individuals or corporations. There are many types of transactions in the small payment system, but the regulatory authority does not have standards for large or small payments. As for the overall payment risk, large payment has a higher risk than small payment. Although small payments have a low risk, it is the most used and involves the most personal data. The risk of transaction with \$100,000 is obviously different from the transaction with \$100. How does the regulatory authority conduct differential risk control?

26

Question

行動支付的發展主要在於支付場景的創造，是否應多鼓勵企業或商家提供更多的消費使用場景？對於政策性活動，也應該要有明確的長期規劃。

Perspectives

行動支付的全面普及，一大關鍵重點在於使用場景是否足夠。這幾年在政府與支付業者的努力下已逐漸改善，例如政府帶頭提供公部門各項規費、稅款等民生業務費用之繳納；各大超商賣場、連鎖商店、交通工具等，都可使用行動支付。而另一方面也增加優惠以鼓勵消費者使用，包括商圈轉型、優惠促銷、回饋折抵等活動推行。但需注意政策宣導效果是否足夠，若將預算過於集中在時效性短的一次性活動，亦無法吸引民眾養成行動支付的消費習慣。建議主管機關應規劃長期政策以培養消費者使用行動支付，鼓勵企業及商家提供更多的消費使用場景，來達到提升行動支付的真正普及。

27

Question

若遇到無法使用電子支付的民眾或是特殊狀況時(天災、停電、無網路)，其支付的需求及權利該是否會受影響？



Perspectives

目前政府鼓勵發展電子支付，努力提高使用比例，但北歐、中國、美國加州等電子支付比例發展成熟的地區，反而開始立法規定不得拒收現金。當服務效率提升到一定階段之後，民眾會開始在意自己的個人資料安全而轉回使用現金支付，政府政策也須做整體性的考量。若是沒有能力或不願使用電子支付的民眾、沒有手機或網路的弱勢族群，其支付的需求及權利是否會受影響？當國家的支付系統高度數位化後，如果遇到特殊狀況(天災、停電、無網路)，系統無法運作時，金融體系是否因此癱瘓？雖然台灣還未發展到此地步，但在提高行動支付比例的同時，也應提早思考此點議題。

26

Question

The development of mobile payment mainly lies in the creation of payment scenarios, should enterprises or merchants be encouraged to provide more consumption usage scenarios? For policy activities, there should also be a clear long-term plan.



Perspectives

The key to the full popularization of mobile payment is whether the usage scenarios are enough. In recent years, the government and payment providers made great efforts on mobile payment. For example, the government has taken the lead in allowing the public to pay fees and taxes by mobile payment, followed by supermarkets, convenience store chains and transportation. On the other hand, special offers, including business transformation, preferential promotions, rewards and other activities are used to promote mobile payment, but it needs to pay attention to whether the effect of promotion is sufficient, and if the budget is too concentrated on one-time activities with short timeliness which does not attract the public to develop mobile payment habits. It is recommended that the regulatory authority should plan long-term policies to train consumers to use mobile payment and encourage enterprises or merchants to provide more consumer use scenarios to achieve mass-adoption of mobile payment.

27

Question

If consumers cannot use electronic payments or there are special circumstances (natural disasters, power outages, no Internet connection), will their payment needs and rights be affected?

Perspectives

At present, the government encourages the development of electronic payments and strives to increase the use ratio. However, in regions with mature electronic payment development, such as Northern Europe, Mainland China, and California, the government has begun to legislate to refrain from rejecting cash. When the service efficiency is improved to a certain stage, the public will start to care about their personal data protection and switch back to using cash payment. The government must also consider a more holistic view. If certain vulnerable groups are unable or unwilling to use electronic payment, don't have mobile phones or internet, will their payment right and ability be affected? When the country's payment system is fully digitized, if it encounters special conditions (natural disasters, power outages, no Internet), or the system fails to operate, will the country be paralyzed? Although Taiwan has not yet reached this point, it should consider this issue while increasing the proportion of mobile payments.

28

Question

除了常見的租稅優惠以及補助政策以外，主管機關是否還有其他的措施，能提升使用行動支付比例？

Perspectives

台灣有九成以上是中小企業，更有龐大的地下經濟群，部分攤商未接受或使用行動支付的可能原因很多。包括業者對新科技學習較保守、需多繳平台手續費、支付平台眾多、不熟悉操作流程、環境裝置問題（設備成本、機台感應不良、沒有網路），都使其成本增加。而且使用行動支付後，營業資料透明度提高，可能導致稅務成本增加，目前主管機關以租稅優惠及補貼政策進行推廣，但對於營收不到繳稅門檻的業者誘因不大。主管機關是否還有其他的措施，能提升使用行動支付比例，例如韓國針對達一定規模但不提供電子支付的商家進行裁罰，以及民眾使用行動支付消費金額可折抵所得稅等，都可以作為提升使用行動支付的參考。

29

Question

消費者使用電子支付時必須提供許多個人資料，是否可以透過不同的管控措施來限制資料蒐集的範圍及時效性？



Perspectives

消費者使用電子支付雖然便利，但前提是必須先提供許多個人資料，如聯絡資訊、銀行帳戶與信用卡資訊等給支付業者，這便會造成消費者使用上的疑慮。因為沒有管道知道業者對於這些資料的使用方式與流向為何，亦不確定授權後業者會保存這筆資料多久，若將來資料流出責任該歸屬於誰，進而可能演變成更嚴重之資安問題。因此，若能針對支付提供之個人資料的蒐集範圍與時效性進行規範，例如規定完成消費後一段時間內必須要強制刪除，或許能提升消費者的使用意願。

28

Question

In addition to the common tax preference and subsidy policies, does the regulatory authority have other measures to boost the proportion of mobile payment?



Perspectives

More than 90% of enterprises in Taiwan are small and medium-sized enterprises, and there are also huge underground economic groups. There are many possible reasons why some types of vendors do not accept or use mobile payment, including the conservative attitudes toward new technologies, extra platform fees, numerous payment platforms, unfamiliar operating procedures, and device problems (POS equipment cost, poor machine sensing and no Internet), all of which increase costs. In addition, mobile payment boosts the transparency of operating information which also increases the tax costs. At present, the authority promotes mobile payment with tax preference and subsidies, but it is not very attractive to those participants whose revenue does not meet the tax payable threshold. There are other measures, such as South Korea's punishment for businesses that reach a certain size but do not provide electronic payments, and the consumption amount of mobile payment can be deducted from income tax, to be taken as a reference for enhancing the use of mobile payment.

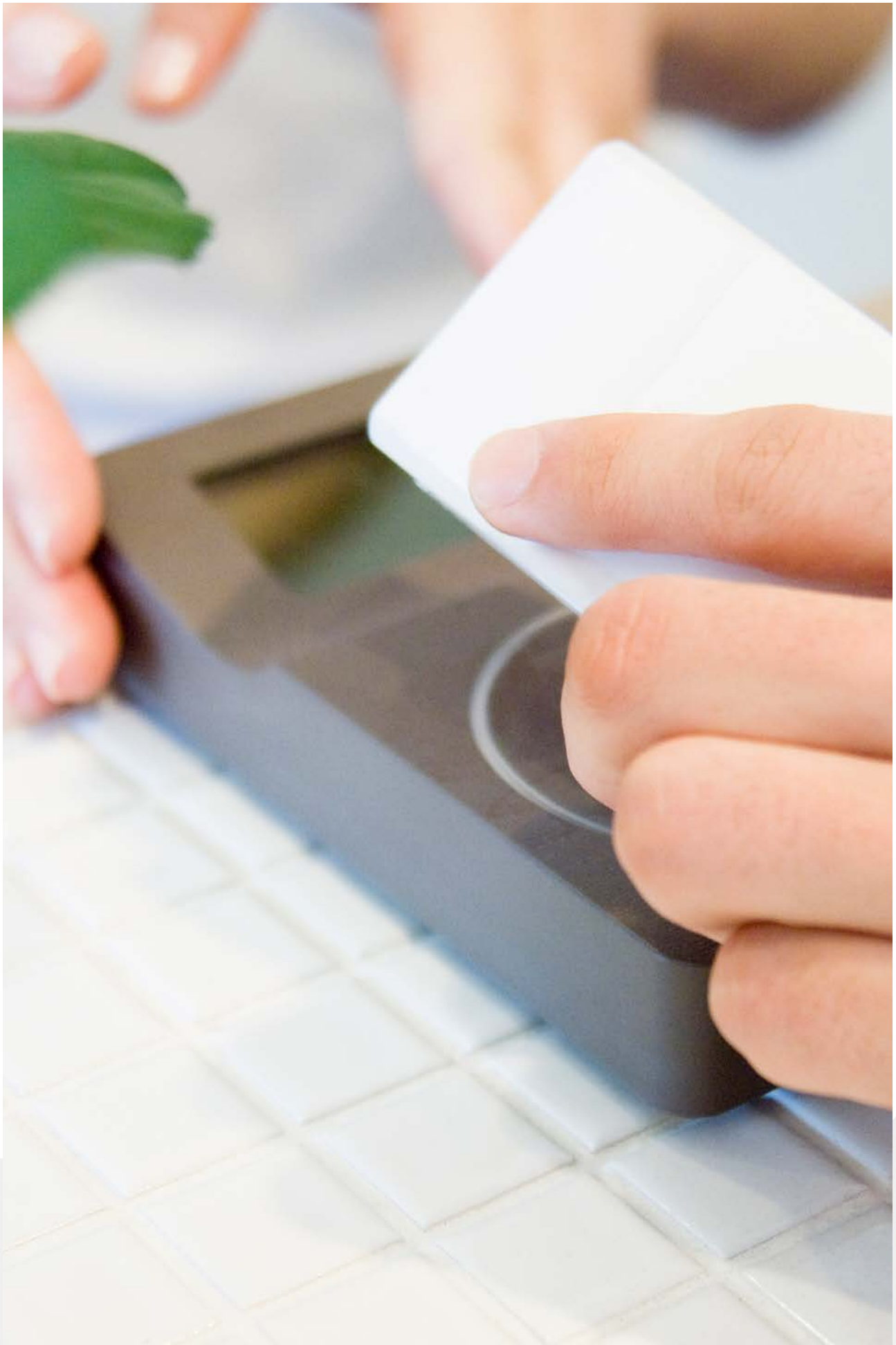
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Question

Consumers must provide a lot of personal data when using electronic payments. Is it possible to limit the scope and timeliness of data collection through different control measures?

Perspectives

Although it is convenient for consumers to use electronic payments, the premise is that they must provide a lot of data first, such as personal contact information, bank account and credit card information etc., to the payment service providers, which will create doubts for consumers. This is because there is no channel to know how the participants use these data and its transaction flows, nor how long the authorized operators will keep this data. If in the future, there is a data leak, who should be held responsible for this security problem? Therefore, if the collection scope and timeliness of the personal data provided by the payment can be regulated, such as stipulating that it must be forcibly deleted after a period of time after consumption, the consumer's willingness to use it may increase.





3 資本市場與財富管理

Capital Markets and Wealth Management

主要探討當新技術應用在資本市場籌集資金及財富管理時，會產生那些不同的商業模式以及法規監理的問題探討。本面向有 11 題，問題重點包括：理財機器人的風險控管議題及規範制度之設立；各式新型態的籌資方式，需要哪些相關法規的配合；資本市場與財富管理未來的發展問題。

It mainly discusses the issues of different business models and regulatory technology when new technologies are applied to capital markets to raise funds and wealth management. There are 11 issues on this topic. The highlights of the topic include the risk control issues of Robo-Advisors and the establishment of a regulatory system, relevant laws and regulations for various new financing methods, and the future development of capital markets and wealth management.

30

Question

未來是否會開放更多元的金融商品，增加機器人理財的投資多元性，以便吸引更多的消費者使用？



Perspectives

目前機器人理財之運用，仍以 ETF (Exchange Traded Fund) 以及基金產品為主流，但與其他國家成熟市場有多種不同類型的產品可供選擇相比，台灣 ETF 產品供應數量並未如其他國家豐富；其次，台灣目前資產管理市場之資產規模、國際化與商品多樣性及成熟度，也仍有成長空間。因機器人理財的商業模式需達到經濟規模，才能有明顯經營效益，建議主管機關鬆綁相關法規以增加機器人理財使用層面，業者也應引進或設計具投資吸引力之產品組合，增加民眾使用機器人理財之意願。

31

Question

現行的理財商品有許多專業條文及限制，相關報表或資訊也較複雜難懂，如何能透過金融科技進行協助簡化，以達普惠金融之目的？

Perspectives

現行的財富管理商品，例如購買基金、保險等產品，其內容保障、權利義務限制大部分都是法律及金融專業條文，一般民眾難以理解。同時市面上理財資訊太多，民眾蒐集了也不見得懂，亦不知其正確與否。業者是否能藉由金融科技工具的協助，用淺顯易懂的文字說明，或是用圖表說明，協助客戶進行分析複雜的金融商品，以提高民眾接觸財富管理的意願、降低使用門檻，而不是限於相關背景及高資產階級才能使用，以達普惠金融之目的。

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Question

Will more financial commodities be opened up to increase the investment diversity of Robo-Advisors?

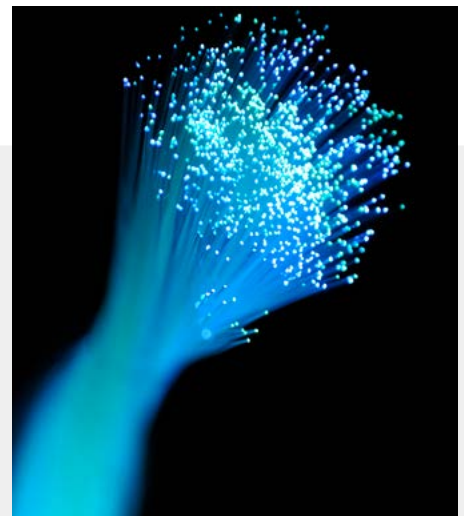
Perspectives

At present, Robo-Advisors are mainly applied to Exchange Traded Funds (ETF) and funds. Unlike other countries that provide many different types of products, Taiwan's ETF product supply is not as abundant. Second, there is still room for growth in Taiwan's current asset management market in terms of the asset size, internationalization, product diversity, and maturity. The obvious operating benefits of Robo-Advisors will emerge only when the business model reaches economic scale. It is recommended that the regulatory authority loosens relevant regulations to increase the application of Robo-Advisors. Participants should also introduce or design an attractive product portfolio to increase investments provided by Robo-Advisors.

31

Question

The current financial management products are regulated by professional provisions and restrictions, and the related reports or information are also quite complicated. How can FinTech be used to help simplify these for the purpose of inclusive finance?



Perspectives

Most of the current wealth management commodities, such as the purchase of funds, insurance and other products, are subject to legal and financial professional provisions, which are difficult for the general public to understand. At the same time, there are various sources of information about wealth management in the market, and people may not understand it or know whether it is correct. Perhaps participants can help customers illustrate and analyze complex financial commodities through FinTech tools, using simple and easy-to-understand text descriptions, or graphic explanations, so as to increase the public's willingness to access wealth management and lower the threshold of use, to achieve inclusive financing.

32

Question

每個投資人的風險屬性及忍受度不同，未來證券型代幣發行 (STO) 的監理標準，是否可以放寬，鼓勵更多投資人參與？

Perspectives

根據金融監督管理委員會於 2019 年公布的《證券型代幣發行 (Security Token Offering, STO) 相關規範》說明，因證券型代幣具有投資性及流動性，故將 STO 列為證券交易法之有價證券，並規劃採分級管理。2020 年 1 月，證券櫃檯買賣中心也對證券商經營自行買賣具證券性質之虛擬通貨業務，擬定各面向的詳細規範。主管機關目前考量虛擬通貨屬技術含量及風險程度較高之產品，故僅限專業投資人始得參與認購及交易，並限於投資三十萬元，且對單一交易平台受理之募資總額度亦設有上限，以控管整體風險。然而每個投資人的風險屬性及忍受度不同，未來的投資限額是否可根據投資人的 KYC 狀況進行彈性調整，而非固定。

33

Question

虛擬貨幣作為新興籌資工具，可能面臨遭竊、詐騙及交易糾紛等問題，主管機關與業者有哪些措施以維護投資人權益？



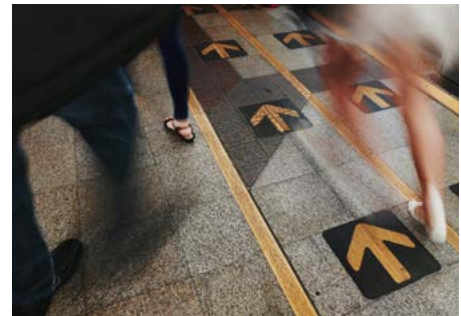
Perspectives

虛擬貨幣作為新興籌資工具，其運作模式除涉及金融、證券市場制度外，運用之區塊鏈技術亦涉及複雜的資訊技術專業知識。如何讓一般投資大眾充分瞭解其運作原理、業務模式及相關風險，而不是呈現資訊不對等的狀態？此外，因科技發展速度遠高於法規制定速度，如發生虛擬貨幣遭竊或投資人間的爭議事件，主管機關法規與業者會採行哪些措施以協助投資人維護其權益，包括針對投資人的詢問或陳情，有無建立與投資人間溝通聯繫的管道？公權力的介入程度將是虛擬貨幣發展的關鍵。

32

Question

Each investor has different risk attributes and different tolerance levels. Can the supervision standards of STO be eased in the future to encourage more investors to participate?



Perspectives

According to the "Security Token Offering (STO) Relevant Regulations" announced by the Financial Supervisory Commission in 2019, STO is identified as securities for its features of investment and liquidity and falls in the regulated activities of securities and exchange laws. In January 2020, TPEx has been authorized by the competent authorities to formulate the "Taipei Exchange Rules Governing the Operation by Securities Firms of the Business of Proprietary Trading of Security Tokens" and other related regulations. The regulatory authority currently considers virtual currency to be a product with a high technical content and a high degree of risk, so currently only professional investors are allowed to invest STO fund-raising projects. Each fund-raising project for a natural person cannot exceed NT\$300,000. There is an upper limit to control the overall risk. However, each investor has different risk attributes and tolerance levels. Rather than a fixed investment limit, can the future limit be flexibly adjusted according to the investor's KYC status?

33

Question

As an emerging financing tool, virtual currency may face problems such as theft, fraud, and transaction disputes. What measures does the regulatory authority have to protect investors' rights and interests?

Perspectives

As an emerging financing tool, virtual currency, in addition to its financial and securities market systems, the blockchain technology used also involves complex information technology expertise. How can we let the general public fully understand its operating principles, business models and related risks, rather than showing information asymmetry? In addition, the development of technology is much faster than the creation of regulations. In the event of virtual currency theft or disputes with investors, will the regulations of the authority and participants adopt those measures to assist investors in safeguarding their rights and interests, including inquiries about investors or is there a channel to establish communication with investors? The degree of public power on intervening in the development of virtual currency will be the key point.

34

Question

如何透過法規開放及金融科技的導入，使資本市場的科技應用及整體環境具備國際競爭力？

Perspectives

因台灣屬淺碟之小型資本市場，在風險控管的政策下，市場法規較偏向保護投資人，以致有許多積極型的投資商品無法進入台灣。但是為了追求資本市場的國際級競爭力以及金融科技的導入運用，是否需要進一步探討法規的可能性，以引導台灣資本市場與國際接軌？而台灣目前也較缺乏吸引投資的國際性標的，建議採取更開放的態度來開放市場，且思考如何透過導入金融科技的運用，加強推動金融科技公司及創新科技的發展。

35

Question

台灣資本市場偏向硬體產業，是否不利於新創及金融科技業者籌資，也難引吸引國外大型業者來台上市？



Perspectives

台灣以傳統製造及貿易出口起家，隨著市場變化，逐漸轉型成專業代工及電子製造，硬體產業在資本市場上佔了近六成比例，因此市場投資人與市場標的主流都是研究硬體產業。如果要讓資本市場跟上金融科技發展趨勢，增加未來競爭力，主管機關應該要思考是否以更開放態度修正《公司法》、《證卷交易法》等上市櫃規則。讓新創及金融科技業者更利於籌資，甚至吸引國外大型業者來台上市，新創及金融科技業者的新科技、新的營運模式必須要在資本市場能取得最大的未來價值，才是有競爭力的資本市場。

34

Question

How can the technology application and overall environment of the capital market be competitive internationally?



Perspectives

Taiwan's capital market remains shallow as regulations tend to protect investors under the risk control policy, so that active commodity investments cannot enter Taiwan. But in order to pursue the international competitiveness of the capital market and the sustainable development of FinTech, perhaps it is necessary to further explore the possibility of regulations to guide Taiwan's capital market into international integration. Taiwan currently lacks an international target for attracting investment. It is recommended to adopt a more open attitude to strengthen the development of FinTech companies and FinTech innovations.

35

Question

Taiwan's capital market is biased towards hardware industries and not conducive towards financing FinTech startups and companies. Is it difficult to attract large foreign companies to list in Taiwan?

Perspectives

Taiwan's capital market started with traditional manufacturing and export trading. As the market changed, it gradually transformed into professional OEM and electronic manufacturing. The hardware industry accounts for nearly 60% of the capital market. Therefore, mainstream market investors and market targets are those devoting research to the hardware industry. If the capital market is to keep up with the development trend of FinTech and boost the future competitiveness, the regulatory authority should consider whether to amend the Company Act, Securities and Exchange Act and regulations on securities listings for FinTech startups and FinTech companies financing. The operating model and new technology of startups and FinTech companies must have the greatest future value in the capital market to be competitive.

36

Question

越來越多民眾願意嘗試使用理財機器人的服務，未來若開放自動下單功能，有無任何配套措施能夠保護投資人權益？

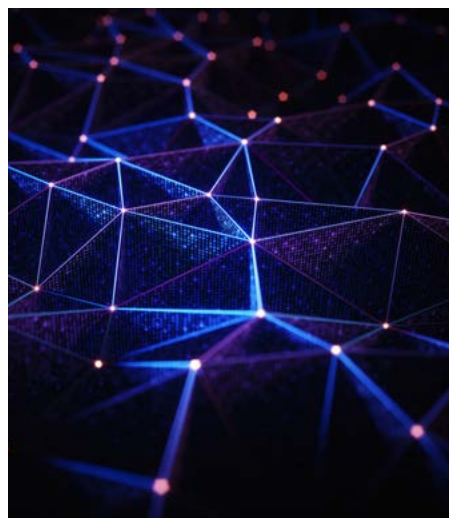
Perspectives

目前台灣的理財機器人是運用演算法，透過大數據及計量模型分析，為客戶的風險等級配置投資組合，以及在一定條件下，提供資產再平衡服務，一般也稱為投資顧問服務自動化。若未來擴大到全權交給 AI 機器人進行自動下單，實現理財自動化目標，當遇到市場異常波動或是演算法錯誤時，如何避免在證券交易市場極端狀況下，因自動下單機制造成投資人的損失？主管機關是否有任何配套措施或規範能夠事前、當下、事後的保護投資人權益，目前的等相關法令是否足夠保障？

37

Question

如何有效推廣首次代幣發行 (ICO) 以及證券型代幣發行 (STO)，讓新創業者有更多元的募資管道？



Perspectives

首次代幣發行 (Initial Coin Offering, ICO) 是指企業透過發行「以區塊鏈技術為基礎」之專屬虛擬代幣，來向特定或不特定的公眾募集法定貨幣或是虛擬貨幣之募資行為。但因一般 ICO 募資不受政府監管，只需擁有區塊鏈技術與撰寫白皮書即可發行，導致詐騙風險非常高，於是發展出證券型代幣發行 (Security Token Offering, STO)。STO 使用的技術與 ICO 相同，但是必須與資產或權益綁定，例如現金、股份、固定收益資產、不動產、大宗商品等，因此 STO 受到各國證券主管機關的許可與規範，可以將 STO 視為更加符合法律規範的 ICO。這兩者都突破了傳統金融的募資障礙，透過加密貨幣與智能合約的方式募集資金，成為新型的募資管道。因應這些新型募資管道，建議政府需重新檢視企業籌資之法規，加入金融科技發展的相關政策，協助新興籌資金融科技工具在台灣的發展。

36

Question

More and more people are willing to try the services of Robo-Advisors. If the automatic order placement function is created in the future, will there be any supporting measures to protect the rights and interests of investors?



Perspectives

Currently, Robo-Advisors in Taiwan use algorithms, big data, and quantitative model analysis to configure investment portfolios based on customers' risk levels and provide asset rebalancing services under certain conditions. This is commonly known as an automated investment advisor. In the future, if AI robots have the power to conduct automated investments and achieve the goal of financial automation, will authorities have any supporting measures or regulations that can protect the rights and interests of investors to avoid investment losses under the extreme conditions of the securities trading market when facing abnormal market fluctuations or algorithm errors? Currently, do relevant laws and regulations protect investors thoroughly?

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Question

How can we effectively promote the initial token offering (ICO) and the security token offering (STO), so that new entrepreneurs have more diversified funding channels?

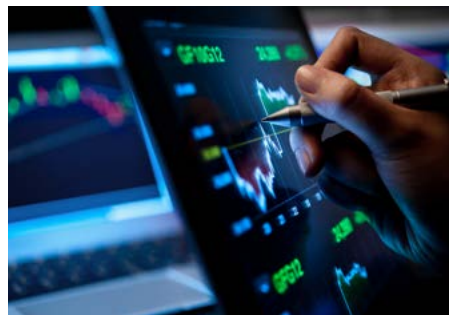
Perspectives

ICO (Initial Coin Offering) refers to the fund-raising behavior of enterprises to raise fiat money or virtual money from a specific or non-specific public by issuing exclusive virtual tokens "based on blockchain technology". However, general ICO fundraising does not need to be regulated by institutions and governments, it only needs to have blockchain technology and write white papers, which leads to a very high risk of fraud. Therefore, STO (Security Token Offering) has been developed. STO uses the same technology as ICO, but the security token must be bound to assets or equity, such as cash, shares, fixed income assets, real estate and commodities. Therefore, STO must be approved and regulated by the securities authorities of various countries. STO can be regarded as an ICO that is more in line with legal regulations. Both of ICO and STO have broken through the fundraising barriers of traditional fundraising and become a new type of funding channels through cryptocurrencies and smart contracts. In response to these new fundraising channels, it is recommended that the government review the corporate fundraising regulations and add relevant FinTech development policies to assist in the development of fundraising tools in Taiwan.

38

Question

機器人理財背後演算法所隱含的風險該如何評估，是否有相關指標或數據可以更明確的讓使用者進行比較？



Perspectives

演算法為機器人理財的服務系統核心，不同演算法採用之模型所產生的資產配置、投資建議與績效表現皆可能不同。主管機關要求業者內部必須建立演算法的監管機制，包含進行期初審核以及定期審核，然而現行並無將演算法風險明確揭露及利於使用者評估之指標。主管機關是否應聘請專家團隊一起辨識相關風險，透過監理科技的進步，檢視業者演算法之投資交易行為是否異常變化，並建立即時連線監理機制，持續關注市場風險。

39

Question

對於例如首次交易平台發行 (IEO) 等相關新興籌資方法，政府的開放的政策是否應該更明確，以保護民眾權益與鼓勵業者發展？

Perspectives

首次交易平台發行 (Initail Exchange Offering, IEO) 是指新創公司在加密貨幣交易平台的幫助下出售其加密代幣，以進行融資的行為。IEO 由交易平台背書發行，新創公司透過交易平台讓大眾進行買賣，跳過向大眾募資的過程，直接把代幣放在交易所上進行銷售交易。其本質與 ICO 相同，但將所有需要考量的風險因素全部轉移給交易所，可以理解成交易所用其自身的審核制度來代替監管。目前主管機關僅對於這些數字資產交易所的反洗錢 (Anti Money Laundering, AML) 部分進行修法納管，2019 年公布的《證券型代幣發行 (Security Token Offering, STO) 相關規範》當中，也無進一步說明 IEO 相關政策，建議政府對於開放 IEO 市場政策應更加明確。

38

Question

How to expose and evaluate the risks behind Robo-advisor algorithms?

Perspectives

The algorithm is the core of the Robo-advising service system, meaning that the asset allocation, investment advice and performance may vary with models used by different algorithms. At present, the regulatory authority requires that participants must establish an algorithm monitoring mechanism, including initial and regular reviews. However, the risks of algorithms and assessment indicators are not exposed. Perhaps the regulatory authority should hire a team of experts to identify related risks and check whether the investment transaction behavior of the operator's algorithm changes abnormally via advanced technological supervision and establish a real-time supervision mechanism to continuously pay attention to market risks.

39

Question

Should the government's policy on the opening of the initial exchange offering (IEO) market be clearer?



Perspectives

IEO (Initial Exchange Offering) is a fundraising event operated directly by cryptocurrency exchanges for financing. IEO is conducted on the platform of a cryptocurrency exchange. Startups allow the public to buy and sell through the trading platform, skipping the process of raising funds from the public, and directly have token exchanges on the trading platform. It is essentially the same as ICO, but all the risk factors that need to be considered are transferred to the exchange. It can be understood that the exchange uses its own monitoring system to replace supervision. Since the agreement reached by both parties will not be announced, there are still regulatory concerns about the stability of the exchange and the brand reputation. At present, the competent authority only revises and manages the "Anti-Money Laundering (AML)" part of these digital asset exchanges, and there is no further explanation for IEO related policies in the "Security Token Offering (STO) Related Specifications" announced in 2019. It is suggested that the government should be clear about the policy regarding opening the IEO market.

40

Question

如何透過 Open API 的資訊分享，將數據的主導權還給消費者，提升證券或財富管理開戶效率？

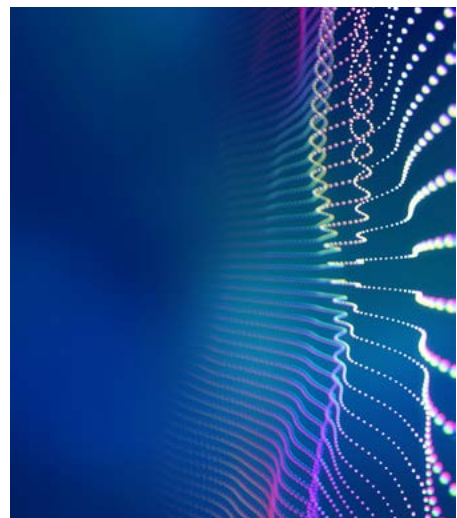
Perspectives

Open API 的精神在於資訊分享，藉此推動金融業、金融科技業及非金融公司之合作與競爭，也將數據的主導權還給消費者。消費者可以獲得更多元的跨金融服務，TSP 業者則省下數據相關成本，金融業者則是接觸更多客源，共同達到三贏的局面。而開放銀行 (Open Banking) 目前只開放到第一階段的商品資訊查詢，第二、第三階段的客戶資訊、交易資訊涉及層面較廣，包括客戶資料的建立、相關徵信審核機制的設計仍有待主管機關明確公布規範。因現行的證券開戶流程繁瑣又耗時、開完證券戶還要再開銀行戶，若未來能夠透過 Open API 的數據串接，例如連結其金融機構已開戶證明或個人資料、交易明細、財力證明等資訊，將可以提升開戶效率。

40

Question

How can the efficiency of securities or wealth management account opening be improved through Open API information sharing in order to return the leading power of data to consumers?



Perspectives

The spirit of Open APIs (Open Application Programming Interface) lies in information sharing, thereby promoting cooperation and competition between financial, FinTech and non-financial companies. It also returns the dominance of data to consumers who can get more diverse cross-financial services. Third-party service providers (TSPs) can save data-related costs while financial service providers can win more customers to achieve a win-win situation. Open Banking is currently only open to the first stage of product information query. The second and third stages of customer information and transaction information involve a wide range of aspects, including the establishment of customer information and the design of the relevant credit review mechanism. The specifications still need to be announced by the regulatory authority. Because the current securities account opening process is cumbersome and time-consuming, you must open a bank account after opening a securities account. If you can use the Open API data connection in the future, such as linking the certification of the financial institution's opened account or the consumer's personal data, transaction details, financial statement and other information, it will improve the efficiency of account opening.



4 財經素養與一般性議題 Financial Literacy and General Issues

財經素養是對財經議題概念和風險的認知與管理，包含教育、個人、業者、政府單位都應一起思考如何提升，本面向共有 11 題。問題重點包括：政府與業者應從教育及市場同時進行金融知識、信用管理的相關推廣；法律的執行與規範，影響民眾的權利義務以及金融科技業者的發展；Open API、Open Banking、TSP 業者之間的管理、風控、責任歸屬議題也在此面向一同討論。

Financial literacy is the concept and risk control of financial issues in education, individuals, participants, and government units. They should all think together about how to improve financial literacy. This topic has 11 issues in total. The key issues include whether the government and participants should promote financial knowledge and credit management at the same time from education and the market, the implementation of laws, the rights and obligations of the people, the development of FinTech companies, management, risk control, and attribution of issues among Open API, Open Banking and TSP operators.

41

Question

政府單位如何強化信用管理的管制與教育推廣，以落實台灣民眾對於信用管理的認知與使用？



Perspectives

台灣校園關於金融知識的推廣教育多偏向正確理財觀念、金融詐騙的防止等，較缺乏信用管理教育，以至於消費者不理解信用評等是什麼，如何可以變好以及信用不良對其帶來的影響。錯誤的個人信用管理觀念可能導致信用破產，影響未來使用金融服務的權益，例如當年的卡債風暴，讓民眾跟銀行兩敗俱傷。政府單位如何強化信用管理的管制與教育推廣，以落實台灣民眾對於信用管理的認知與使用。

42

Question

建議金融及教育的主管機關應將金融商品知識的推廣落實於各階段教育課程，避免產生金融行為偏差及對金融科技的信任度不夠之情形。

Perspectives

近年來金融科技快速發展，各式新興金融服務與商品不斷出現，使得金融文盲問題更加嚴重。當金融商品知識推廣未能充分落實於校園教育時，將導致消費者進入社會後對金融理財知識不足，對金融科技信任不夠，難以達到普惠金融的目標。除了金融及教育主管機關應持續加強校園金融知識的推廣教育外，也建議全面列入課綱教材或進行認知檢定，依不同層級給與相對應的金融知識教育，成立專門的金融教育研究發展單位。民間業者也有責任協助推廣，用更白話、更貼近民眾的方式進行金融知識教育。

41

Question

How can the awareness of credit management in Taiwan be strengthened and implemented into the education system in order to raise awareness for credit management?

Perspectives

The promotion and education of financial knowledge on Taiwanese campuses tend to focus on correct financial management concepts and the prevention of financial fraud. The lack of credit management education causes consumers to not understand the concept of credit rating, how to rebuild it, and the impact of bad credit score. Wrong personal credit management concepts may lead to bankruptcy and affect the rights and interests of using financial services in the future, such as a credit card debt storm, which creates huge losses for the public and the bank. Government units should continue to promote the education of credit management in order to strengthen the public's awareness and understanding.

42

Question

The promotion of financial commodities knowledge needs to be implemented by the regulatory authority of finance and education in all levels of education courses to avoid deviations in financial behavior and insufficient trust in financial technology.



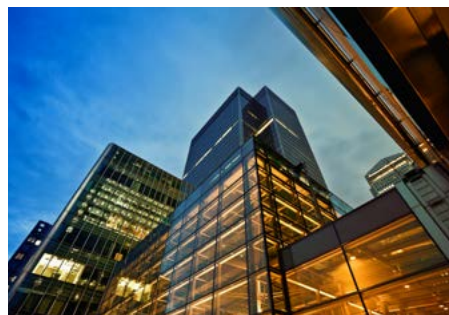
Perspectives

In recent years, the rapid development of FinTech and the emergence of various technology services and commodities has highlighted the financial literacy problem. If the promotion of financial commodity knowledge is not fully implemented in campus education, it will result in insufficient knowledge of finance and financial management after entering society, and users will have insufficient trust in financial technology, making it difficult to achieve the goal of inclusive financing. In addition to the relevant financial and education authorities, the promotion and education of financial knowledge on campus should be continuously strengthened. It is also recommended to comprehensively include curriculum textbooks or conduct certain cognitive inspections, provide corresponding financial knowledge education at different levels, and establish a special financial education research development unit. Startups in the market also have a responsibility to promote education and provide financial knowledge education in a more accessible way.

43

Question

政府能否有更多便利的展示空間供新創業者展示互動，使消費者可以深入了解相關應用技術及熟悉生活使用場域？



Perspectives

許多新創公司有好的創意想法與新型態的服務，但苦無機會與消費者接觸與展示，政府是否能有一個長期的空間供新創業者展覽，加強與消費者互動？建議可以盤點相關場地資源，開放業者設置體驗設施，展示自己的創意發想與營運模式，打造一座互動式的 FinTech 體驗館，使消費者可以深入了解相關應用技術及熟悉生活使用場域。除了實體展示，也可以定期做新創公司的彙整、簡介資料，定期公布於網路，協助增加企業曝光度。

44

Question

隨著 Open API 的逐步開放，TSP 業者的管理標準是否可依涉入業務風險，訂定不同的分級管理規範？

Perspectives

隨著主管機關對於 Open API 的逐步開放，對於 TSP 業者未來的需求以及發展性也越來越大，金融機構與 TSP 業者會有更多的合作模式出現。除了已公布的相關自律規範、標準以及應遵守事項以外，隨著不同階段的開放，對相關業者的要求將逐漸提高。為鼓勵業者投入市場，讓資源不足的小型 TSP 業者也能提供金融科技創新的可能，是否可以考慮根據涉入的業務內容風險高低程度，訂定不同的分級管理規範。

43

Question

Can the government provide a more convenient display space for startups to show and strengthen interaction with consumers so that they can have a deeper understanding of related application technologies?

Perspectives

Many startups have creative ideas and new-type services, but they have no opportunity to interact with consumers. Can the government provide a long-term space for startups to strengthen interaction with a new generation of consumers? It is recommended to check relevant venue resources, to open the right for participants to set up experience facilities, display their creative ideas and operating models and create an interactive FinTech experience hall, so that consumers can have a deeper understanding of related application technologies and become familiar with its usage. In addition to physical display, it is recommended to regularly collect brief profile information about startups and publish them on the Internet to help increase corporate exposure.

44

Question

With the opening of the Open API, can the management standards of TSP operators be adjusted according to the business and the risk involved with it?



Perspectives

With the gradual opening of the Open API(Open Application Programming Interface) by the regulatory authorities, the future demand for Third-party Service Providers (TSP) is also driven up and there will be more cooperation models between financial institutions and TSPs. In addition to the published self-regulatory norms, standards, and matters to be complied with, the requirements for relevant providers will gradually increase. In order to encourage providers to enter the market and allow small TSPs with insufficient resources to have the possibility of FinTech innovation, different levels of management regulations should be considered for different business contents and their respective risk levels.

45

Question

TSP 業者與金融機構之間的合作模式與責任歸屬如何劃分，是否會影響金融機構發展開放銀行 (Open Banking) 的意願？

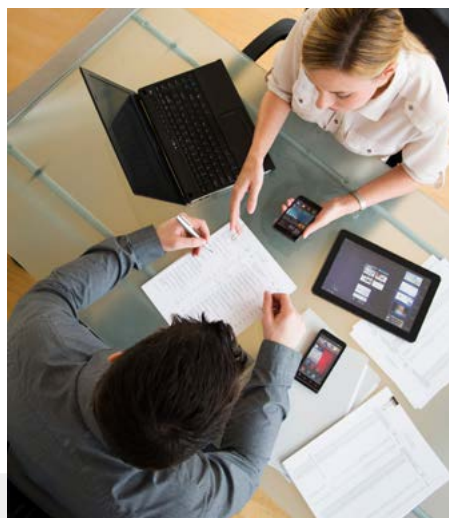
Perspectives

目前主管機關做法傾向先公布 TSP 業者的遴選原則，再以類似委外作業的概念，由金融機構自行尋找相關業者合作。因此金融機構要為自己所找的業者負責，而 TSP 業者應遵守相關自律規範、標準以及注意事項。若發生客戶資料安全外洩及爭議責任歸屬問題，國外做法是先由金融機構全權向消費者負責，再討論後續責任歸屬與求償，但此作法是否符合台灣仍有待討論。在還沒有明確的規範之下，是否會影響金融機構發展開放銀行 (Open Banking) 的意願，主管機關應多加思考。

46

Question

Open API 的開放便利性與個人資料法的安全保護要如何權衡，資訊橫跨多平台與業者，主管機關是否有能力或者機制，找出問題根源及後續責任釐清？



Perspectives

國外 Open API 有明確的法律開放規定及完整的個資保護作為配套措施，例如歐盟開放銀行資料法下的付款服務指示法 (The second Payment Services Directive, PSD2) 以及一般資料保護規範 (General Data Protection Regulation, GDPR)。而國內目前 Open API 是由金融業者自願性開放資訊，並沒有法令依據強制進行，個人資料保護法也還有修正空間。因此在 Open API 的開放便利性與個人資料保護法的保障之間，主管機關該如何權衡對台灣有利的發展模式？未來 Open API 第二、三階段的開放後，消費者可以享受到更完整、更快速的金融服務，相對的在後台參與資訊串接的角色及分享的數據也會增加。當 API 資訊跨多平台與業者時，主管機關是否有能力或者機制，找出問題根源及後續責任釐清。

45

Question

How can we divide the cooperation mode and responsibility between TSP operators and financial institutions? Will it affect the willingness of financial institutions to develop Open Banking?



Perspectives

At present, the regulatory authority first publishes the selection principles of TSPs, and then financial institutions will find relevant providers to cooperate with, similar to the concept of outsourcing operations. Therefore, financial institutions should be liable for their providers, and TSPs should abide by relevant self-regulatory norms, standards, and precautions. In the event of a customer's security breach and the attribution of disputed liability, the practice in foreign countries is that solely the financial institution is responsible to the consumer, and will then discuss the subsequent liability attribution and compensation. Whether this practice will work in Taiwan remains to be discussed. In the absence of clear regulations, the regulatory authority should think more about whether it will affect the willingness of financial institutions to develop Open Banking.

46

Question

How can we strike a balance between the convenience of Open APIs and the security protection of the Personal Data Act? With information across so many platforms and participants, how can the regulatory authority identify the source of the problem and clarify the subsequent responsibility?

Perspectives

There are clear regulations and complete personal data protections as supporting measures for Open APIs in foreign countries, such as the EU's PSD2 (Payment Service Directive) and GDPR (General Data Protection Regulation). At present, Open APIs are voluntarily opened by financial institutions in Taiwan, and there is no legal basis to enforce it. There is still room for amendments to the protection of Personal Data Act. How should the authorities decide which model is beneficial to Taiwan's development? After the opening of the second and third stage of the Open API, consumers can enjoy more complete and faster financial services, and the relative participants involved in information integration can share more and more data. When API information spans so many platforms and participants, once a problem occurs, does the regulatory authority have the ability or mechanism to identify its root cause and clarify the subsequent responsibility?

47

Question

近期投資虛擬貨幣產品的新聞不斷出現，其涉及洗錢防治、交易實名制及消費者保護等諸多議題，政府單位的相關監管機制為何？

Perspectives

近來全球虛擬貨幣的相關產品不斷推出，各國紛紛對其作出定義釐清及制定更明確的監管框架。中央銀行表示因其價格波動劇烈且無中心化的發行者、信任機制仍不完善，沒有任何保障機制與制度性安排，發展至今仍不具貨幣功能，僅為一種虛擬商品，不適合作為支付工具以及與現實金融市場結合。除此之外虛擬貨幣涉及洗錢防治、交易實名制及消費者保護等諸多議題，監管難度較高，建議政府相關單位應廣納各國作法，儘速研擬出明確且適合台灣金融市場發展的虛擬貨幣監管機制。

48

Question

主管機關如何提升整體民眾之金融知識水準以及金融參與率？



Perspectives

標準普爾公司 (Standard & Poor's) 在 2015 年發表了全球金融知識水準調查，報告中指出亞洲地區有四分之三的成年人較不具備金融知識。而台灣的金融識字率僅 37%，僅略高於全球平均的 33%，可以看出雖然台灣社會基礎教育普及，但多數民眾仍處於金融知識水準不足狀態。尤其是學生、年長者、失業者、原住民等弱勢族群更需加強，若民眾對基本的金融知識認知不足，除無法有效保障自己權益外，嚴重者甚至引發社會問題。例如退休金理財、詐騙行為警覺，都值得主管機關重視。除了原有的金融知識以外，隨著金融商品與服務多元，也應納入洗錢防制、虛擬貨幣、綠色金融及金融科技相關新興議題。

47

Question

Recent news about investing in virtual currency products is constantly emerging, which involves issues such as money laundering prevention, transaction real-name system, and consumer protection. What is the relevant regulatory mechanism of government units?



Perspectives

Recently, products related to global virtual currencies have been constantly emerging, and countries around the world have clarified virtual currencies and introduced a clearer regulatory framework. The central bank said that due to its fierce price fluctuations and decentralized issuers, the trust mechanism is still not perfect, there is no guarantee mechanism and institutional arrangements, and the development still has no monetary function. It is only a virtual commodity, not suitable as a payment tool and not integrate with realistic financial market. In addition, virtual currency involves many issues, such as money laundering prevention, real-name system and consumer protection, so it is difficult to supervise. It is recommended that relevant government units should adopt the practices of various countries and develop a virtual currency supervision mechanism suitable for the development of Taiwan's financial market.

48

Question

How can the regulatory authority improve the financial literacy level and financial participation rate of the entire population?

Perspectives

According to the 2015 Global Financial Literacy Survey (S&P Global FinLit Survey), three-quarters of Asian adults in Asia are less knowledgeable about finance. Taiwan's financial literacy rate is only 37%, slightly higher than the global average of 33%. It can be seen that despite the popularization of basic social education in Taiwan, most people are still in a state of insufficient financial literacy. Especially vulnerable social groups, such as students, the elderly, the unemployed, aboriginals, etc. need to be strengthened. If the public has insufficient knowledge of basic financial concepts, in addition to the inability to effectively protect their rights and interests, seriously it may even cause social problems, such as pension planning and fraud awareness which deserves the attention of the competent authorities. In addition to the existing financial knowledge, with the diversification of financial products and services, it should also include emerging issues related to money laundering prevention, virtual currency, Green Finance and FinTech.

49

Question

金融科技的創新發展常超出現有法律之規範，現行法規是否能多以開放鼓勵創新之角度進行制定？

Perspectives

金融科技帶來的創新營運模式，可能不在現有法律規範當中或是涉及法律模糊地帶，而台灣屬於成文法體系，司法機關對於解釋法規定義較為嚴謹。只要法令沒有規定可以做的，業者會有所顧忌，常成為市場創新的阻力。建議金融主管機關與法律主管機關，對於現行法規的制定以及法律模糊地帶的解釋，應再多做意見交換並從開放角度進行制定，同時也要加強司法人員的金融科技知識的教育，以鼓勵創新發展。

50

Question

主管機關期待純網銀加入刺激現有金融市場，但對於未來可能的監管議題，是否已做好相關配套措施？

**Perspectives**

台灣目前銀行家數眾多且業務競爭激烈，一般民眾對於純網銀的需求較不明顯，且主管機關對於實體通路多有限制，業務範圍也無特殊區別。雖然純網銀在營運成本擁有優勢可將利潤回饋民眾，但對於爭取客源和獲利均是不小挑戰。由於純網銀的本質仍與傳統銀行大致相同，但因完全透過網路或數位管道提供服務，所以在風險管理上略有差異，尤其是流動性、資安、法遵及洗錢防制風險，對純網銀的經營更為重要，主管機關是否需要加強相關監管機制？在傳統銀行與純網銀的相互競爭之下，金融機構可能面臨加速轉型、減少實體分行，相關之人力資源調整及訓練轉型問題，銀行業者與主管機關也都應及早思考因應配套措施。

49

Question

The development of FinTech innovations often exceeds the norms of existing laws. Can the current regulations be formulated with the opening-up perspective of encouraging innovation?



Perspectives

The innovative operation model brought by FinTech may not be in the existing legal regulations or involve legal ambiguity. Taiwan belongs to a statutory law system. If it is not stipulated in the law, it cannot be done. Therefore, the judiciary has a strict definition of the interpretation of regulations which often blocks market innovation. Financial authorities and legal authorities should make more exchanges of opinions on the formulation of current regulations and the interpretation of vague areas of the law and formulate them with opening-up perspective of encouraging innovation. At the same time, they should also strengthen the education of judicial personnel in FinTech knowledge.

50

Question

The regulatory authority expects digital full bank to join in stimulating the existing financial market. Have the relevant corresponding measures been taken for possible future regulatory issues?

Perspectives

The number of banks in Taiwan currently are diverse and the business competition remains fierce. General public's demand for digital full bank is less and the regulatory authorities have more restrictions on physical channels and there are no differences regarding business scope. Although cost advantage of digital full bank brings in profits that can be shared with the public, it is not a small challenge to win customers and make profit. The nature of digital full bank is still roughly the same as that of traditional banks. However, because the services are completely provided through the Internet or digital channels, there are slight differences in risk management, especially liquidity, security, legal compliance and money laundering prevention risks, which are quite important to the operation of digital full bank. Does the competent authority need to strengthen supervision? Under the competitions between traditional banks and digital full bank, traditional banks may face the problems of accelerating transformation, reducing physical branches, related human resources adjustment and training for transformation. Both traditional banks and competent authorities should also consider the corresponding measures as soon as possible.

51

Question

智能合約與一般傳統契約不同，是否有明確法令認可智能合約及區塊鏈修改記錄資料之效力？



Perspectives

智能合約是透過區塊鏈技術將合約的觸發條件及執行條件程式化，不但省去第三方認證且不可竄改，大幅加速執行流程及節省成本。也因智能合約與一般傳統契約不同，已將雙方同意的契約內容轉化成程式碼自動執行，進而衍生出許多法律議題。例如，寫入智能合約的程式碼是否足夠明確而成為法律上的契約內容、究竟有沒有法律效力？當智能合約實際執行時，造成合約雙方以外的第三者有所損害時，該由誰來負責、智能合約的程式撰寫者是否有責任等問題。實務上仍未有一套專屬法規來明確規範，中國、英國及美國部分州政府皆有推出智能合約及區塊鏈技術法案，承認區塊鏈簽名及智能合約效力，都可供主管機關參考。

51

Question

Smart contracts are different from general traditional contracts. Is there a clear law that validates the effect of modified smart contracts and blockchain data? Smart contracts are different from general traditional contracts.

Perspectives

Smart contract is a blockchain-based technology regarded as a secured stored procedure as its execution and codified effects like the transfer of some value between parties are strictly enforced and cannot be manipulated. Smart contracts allow the performance of credible transactions without third parties which significantly accelerates the execution process and saves costs. Because smart contracts are different from general traditional contracts, the content of the contract agreed by both parties has been converted into code for automatic execution, which has led to many legal issues. For example, is the code written into the smart contract clear enough to become a legal contract content? Is there any legal effect? When the actual execution of the smart contract causes damage to a third party other than the two parties of the contract, who should be responsible? Does the person who writes the smart contract program have responsibilities? In practice, there is still no set of exclusive regulations to clearly regulate. China, UK, and some state governments in the United States have released smart contracts and blockchain technology bills, recognizing the effectiveness of blockchain signatures and smart contracts, which can be used by the competent authority for reference.



5 客戶參與 Customer Participation

是指消費者在與業者互動的過程中，從察覺、考慮、詢問、使用到回饋等面向，探討消費者常遇到所遇到的痛點與問題，本面向共有 14 題。問題重點包括：業者應全面檢視與客戶的接觸點，改善客戶體驗；整合所有能即時協助消費者購買或辦理金融業務的資訊，以及其正確性；政府如何鼓勵、協助新創業者與民眾相互交流、認識。

This refers to the interaction between consumers and financial service providers in terms of perception, consideration, inquiry, using, feedback, and other aspects to discuss the pain points and problems that consumers often encounter. This topic has a total of 14 issues. The key issues include whether financial service providers should comprehensively examine the contact points with customers to improve the customer experiencing, the integration of all information for real-time assistance in consumer purchase or processing financial services, and how to assist startups in communication with the public.

52

Question

金融商品的資訊過多且複雜，對於一般消費者來說仍具備較高的知識門檻，如何在符合法規的要求下，又能提供清楚明瞭的資訊給消費者？

Perspectives

複雜的金融商品對於一般消費者來說仍具備較高的知識門檻，業者在法規要求下必須使用完整且專業的金融術語，說明金融商品之類型、特性以及風險，反而造成一般消費者無法理解。在資訊獲取不完全的情況下，消費者容易出現流程斷點，導致參與意願下降。主管機關和業者都應思考，如何在符合法規的要求下，提供淺顯易懂的金融商品資訊，以及到底什麼才是消費者真正想了解的重要資訊，解決消費痛點。

53

Question

如何協助消費者在購買金融商品或服務時，能夠更清楚的了解商品內容與運作？



Perspectives

消費者於金融商品選購的過程當中，因為對於金融商品或服務的不了解，多會先以親友經驗或網路資訊作為選擇依據。而消費者接受的資訊來源會因不同通路、時段或業者提供的訊息而有所限制，例如各檔期主打產品、新推出產品、因業績壓力推薦高單價商品等，以致於消費者找到的產品，不一定是最符合自身的需求。建議業者在提供相關產品及服務時，應思考如何了解消費者真正需求，主管機關也要持續進行金融商品的教育、知識推廣，以協助消費者更清楚的了解商品內容與運作。

52

Question

There is too much information about financial commodities, and there is a high knowledge threshold for ordinary consumers. How can we provide the clearest and most concise information to consumers without breaching regulations?



Perspectives

Complex financial commodities still have a high knowledge threshold for the average consumer. Under the legal requirements, participants must use complete and professional financial terms to explain the types, characteristics and risks of financial commodities, which is difficult for the average consumer to comprehend. In the case of incomplete information acquisition, process breakpoints are likely to occur, leading to a decline in consumer willingness to participate. Regulatory authorities and participants should think about how to provide easy to understand financial commodities information, in order to solve the consumption issue while complying with the requirements of regulations.

53

Question

How can we help consumers better understand the content and operation of commodities more clearly when buying financial products or services?

Perspectives

In the process of purchasing financial products, because consumers do not understand the financial products or services, they will choose the product that relatives and friends have purchased and view their experience or search results as the basis for selection. The sources of information received by consumers are limited by the information provided by different channels, time periods, or operators. For example, the products consumers find are not necessarily the ones that meet their needs, but instead are main promotions, newly launched products, high-price products recommended due to their sales pressure. It is recommended that when providing related products and services, participants should think about how to understand the real needs of consumers. The regulatory authorities should also educate consumers about financial products and promote financial knowledge to help consumers understand the content and operation of products more clearly.

54

Question

客戶體驗優化是金融業者轉型的重點議題，也是影響客戶選擇商品與服務的關鍵點，主管機關是否有相關政策鼓勵業者投入？

Perspectives

近年來各行各業都開始強調客戶體驗，此議題也一直是傳統金融業者面臨數位轉型的重點。由於金融的商品與服務模式大同小異、市場競爭激烈，而客戶體驗的優化將是影響客戶選擇商品與服務的關鍵點，許多金融科技的新創業者都從此點切入市場，吸引傳統金融客群。良好的體驗可以增加用戶的黏著度、回訪率，主管機關若能有政策鼓勵業者重視客戶體驗的優化，將可提升民眾使用金融服務的意願與的便利性，業者也能從競爭中脫穎而出取得市場優勢。

55

Question

除了傳統金融業者，是否也應該要求金融科技業者求充分揭露商品契約資訊與風險，以保障消費者安全？



Perspectives

根據規定，金融服務業與消費者訂立提供金融商品或服務之契約前，應依規定向消費者充分說明該金融商品、服務及契約之重要內容及揭露風險。但主管機關對於新型態的金融科技業者，似乎沒有明確規定，提供的服務流程或商品契約資訊需完整揭露，容易引發消費糾紛。又部分業者會使用限制訪客在瀏覽商品時無法看到詳細資訊，必須先經過註冊成為會員才能取得更完整產品訊息的商業手法；但若訪客成為會員後所取得的產品資訊，並非消費者原先期望且符合其需求的產品，如此的流程設計反而會造成消費者對於品牌的不信任。

54

Question

Customer experience optimization is a key issue in the transformation of the financial industry transformation. Does the regulatory authority have relevant policies to encourage participants to invest?



Perspectives

In recent years, customer experience has been emphasized in various industries, and it has always been a key issue for traditional financial operators when facing digital transformation. Due to the similarity of financial products, service models, and fierce market competition, the optimization of customer experience will be the key point that affects their choice of products and services. At this point, many FinTech startups enter the market and attract traditional financial customers through optimizing customer experience. A good customer experience can increase the user's stickiness and return visit rate. If the regulatory authority provides policies to encourage operators to pay attention to the optimization of the customer experience, it will enhance the public's willingness and convenience to use financial services, and participants will then stand out from the competition to gain market advantage.

55

Question

In addition to traditional financial operators, should FinTech companies also be required to fully disclose commodity contract information and risks?

Perspectives

According to regulations, when financial service providers and consumers sign a contract to provide financial products or services, they should fully explain the important contents of the financial products, services, contracts, and risk exposuer in accordance with the regulations. However, the regulatory authority does not seem to clearly stipulate that the service process or commodity contract information provided by new type of FinTech companies must be fully disclosed, which may easily lead to consumer disputes. In addition, some participants restrain visitors from reading detailed information about the product when viewing. It is necessary to register as a member first for product details. If the visitors find the product does not meet the needs after realizing the product details, it will cause consumers to distrust the brand.

56

Question

隨著新興世代的使用模式以及生活作息轉變，金融業者該如何提供更好的客戶服務？



Perspectives

傳統的電話客服或是文字客服效率較低，近期借助著金融科技的發展，金融業者開始積極導入智能客服機器人。透過自然語言的分析處理能力，提供消費者良好與順暢的客戶服務體驗，也較符合新興世代年輕人的使用模式以及生活作息，可以有效溝通對話，降低服務成本。然而在線上與線下多元通路的時代，業者於導入科技的同時，亦須考量全通路的體驗設計與經營。建議業者最好可以做到單一窗口一次性解決問題，減少接洽的轉介，以及提供消費者各通路一致性的服務與對待，讓消費者有良好的客服體驗。

57

Question

消費者在行動裝置上即可完成大多數金融服務，業者與主管機關該如何持續加強行動裝置的安全認證及預防機制？

Perspectives

現代人出門可以不帶錢包，但是一定要帶手機，每一台行動裝置都是一間移動式銀行，消費者在行動裝置上即可完成大多數金融服務，因此業者對於行動裝置的安全認證及預防機制設定顯得更加重要。除了最基本的帳號密碼以外，每當用戶做出交易購買、金額轉帳等重大決策時，都應進行預防機制的二次提醒與身分確認，可以減少後續紛爭與被盜用的可能性。業者與主管機關是否應持續加強行動裝置的安全保護機制，協助用戶進行錯誤偵測和錯誤恢復的防呆機制，都有助於提高消費者透過移動裝置使用金融服務意願。

56

Question

As the usage patterns and lifestyles of emerging generations change, how can financial operators provide better customer service?

Perspectives

With the recent development of FinTech, intelligent service robots are introduced actively by financial operators. Through natural language analysis and processing capabilities, it provides consumers with a smooth customer service experience. In line with the usage patterns and daily routines of young people of the new generation, intelligent customer service robots can effectively communicate and reduce the service cost. However, in the era of multiple online and offline channels, while introducing technology, operators must also consider the experience design and operation of the entire channel. It is recommended that the operator can solve the problem at one time through a single window and reduce referrals and provide consumers with consistent service and treatment in all channels, so that consumers have a good customer experience.

57

Question

Consumers can complete most financial services on mobile devices. How can the regulatory authority continue to strengthen the security certification and prevention mechanism of mobile devices?



Perspectives

Modern people can go out without a wallet, but they must bring a mobile phone. Each mobile device is a mobile bank, and consumers can complete most financial services on the mobile device. Therefore, it is important for operators to establish the security authentication and prevention mechanism settings for mobile devices. In addition to the basic account ID and passwords, whenever users make major decisions, such as transaction, purchases and amount transfers, they should conduct a second identity confirmation with prevention mechanism to reduce the possibility of subsequent disputes and misappropriation. In addition, the foolproof mechanism that assists users in error detection and error recovery should help consumers increase their willingness to use financial services through mobile devices.

58

Question

是否能從使用者角度出發，協助設立金融業務及商品資訊的整合平台？



Perspectives

台灣金融機構家數眾多，當消費者要辦理業務或是購買商品時，常會遇到查詢的困擾。不同金融機構提供的產品資訊層次不一、表述方式也不同，對於消費者來說不易進行業務或商品的比較與選擇。若能從使用者角度出發，透過各金融業者的資訊提供或是跟公部門之間的資訊平台串接，提供單一表述方式的產品、申辦流程解說資訊。使得消費者可簡便的進行業務或商品資訊的比較，以及了解於不同金融機構購買商品所需備妥的表單資訊，都可以為提供消費者更好的客戶體驗，減少消費者與金融機構的溝通時間。

59

Question

建議業者及主管機關對於金融業務流程應持續檢視，在技術及資安許可之下予以優化，以利用戶申請辦理。

Perspectives

用戶申請某些特定金融業務服務時，例如網銀密碼變更、印鑑變更、定存解約等，金融業者常因技術、資安問題，要求用戶回至原開戶分行辦理，若用戶已經搬遷或更換工作地點，相當不方便。雖然不同分行，但同一金融機構的內部資訊應該可以相互傳遞交流，將客戶資訊一同進行移轉，例如遇到分行裁撤，業者也會通知用戶後續改到鄰近分行繼續進行服務，為何特定業務無法改到其他分行辦理？業者應提供更簡便的方法協助用戶處理，若涉及法規限制，主管機關也應持續檢視是否有調整優化的空間。

58

Question

Can we help set up an integrated platform for financial business and commodity information from the perspective of users?

Perspectives

There are numerous financial institutions in Taiwan. When consumers want to handle business or purchase products, they will encounter the trouble of inquiries. Different financial institutions provide different levels of product information and different expressions. It is not easy for consumers to handle business or compare products for selection. If information from financial operators and the public sector is under concatenation through provision of product information and processing expression in a single way to facilitate product comparison and prepare forms required by different financial institutions to purchase commodities, it can provide consumers with a better customer experience and reduce the communication between them and financial institutions.

59

Question

It is recommended that the operators and regulatory authorities should continue to review and optimize the financial business process to facilitate user application processing.



Perspectives

When users apply for financial business services, such as online banking, password change, seal change, and scheduled deposit cancellation, etc., the financial operators often ask the user to return to the original account opening branch due to technical and security issues. If the customer has moved or changed work location, it will be quite inconvenient. The internal customer information of the same financial institution should be able to be shared and transferred by the branches. For example, if the branch is cancelled, the operator will notify the user to transfer the business to the neighboring branch for uninterrupted service. Why can't certain services be changed to other branches? The operator should provide a more convenient method to assist the user to deal with it. If regulatory restrictions are involved, the authority should also continue to check whether there is room for adjustment and optimization.

60

Question

金融及新創業者如何透過給予客戶更完善、更全面的售後服務體驗，來維持交易及增加客戶互動往來關係？

Perspectives

一般消費者對於金融商品的服務需求，涵蓋售前的產品選擇、售中的產品購買以及售後的產品服務。但許多業者礙於業績壓力，較著重銷售前與銷售中的服務，以利提升產品銷售成交率，賺取手續費，僅提供較少或最基本符合法規的金融商品售後服務。主管機關應持續檢視業者是否有提供符合法規的售後服務，也建議業者也要加強給予客戶更完善、更全面的售後服務體驗。因為對消費者而言，售後服務才是與業者持續交易、互動往來的關鍵，良好的售後服務亦可建立企業的品牌形象。

61

Question

政府是否應該多支持金融科技相關領域的論壇、展覽、技術交流活動，提升民眾對於金融科技的認識？



Perspectives

金融科技商業模式多元、技術推陳出新，政府是否應該多支持相關領域的論壇、展覽、技術交流活動，提升民眾對於金融科技的認識，例如每年的金融科技嘉年華、台北金融科技展等推廣活動，能將業者介紹給消費者認識。也可將層級提高到跨國之間的交流、邀請各國負責業務主管機關、業者來台參訪，相互借鏡。對於學生族群、可多舉辦各類型的競賽，例如黑客松、創意競賽等，激發年輕人對於相關領域之興趣，成為未來投入相關產業之人才。

60

Question

How can financial and startups maintain transactions and increase interactive relationships with consumers by providing them with a more comprehensive after-sales service experience?



Perspectives

General consumer's demand for financial products covers pre-sale product, promotional product purchase, and after-sale product service. However, due to sales performance pressure, most of financial operators focus more on pre-sales and promotional item services in order to improve the product sales rate and earn commissions, and only provide after-sales services for financial products that are less or basically in compliance with regulations. The regulatory authority should continue to check whether the operators provide after-sales service that complies with the regulations. It is also recommended that the operators should provide customers with a more comprehensive after-sales service experience so as to increase purchase from the operator in the future. Good after-sales service can also establish the operator's brand image.

61

Question

Should the Government support more forums, exhibitions and technical exchanges in FinTech-related fields to raise public awareness of FinTech?

Perspectives

FinTech business models are diverse and new technology is constantly being released. Perhaps the government should support more forums, exhibitions and technology exchanges in related fields to raise public awareness of FinTech, such as FinTechBase Festival, FinTech Taipei and other promotional activities which introduces the participants to consumers. It can also raise the level of cross-border exchanges, invite FinTech authorities and participants from various countries to visit Taiwan and learn from each other. For student groups, various types of competitions can be held, such as Hackathon, creative competitions etc., to stimulate young people's interest in the FinTech field and become talents in related industries.

62

Question

政府與業者如何讓消費者了解新型態的金融業務以及鼓勵使用新興技術？



Perspectives

隨著數位金融科技快速的興起與發展，金融科技業者或金融業者在導入相關科技的同時，也需要主管機關的支持，制定相關法規以保障金融業務的健全、維持市場穩定與促進未來發展。主管機關與相關金融服務業者都應共同合作，進行政令宣達、提供一般消費者金融科技的相關知識教育、協助消費者多使用新興技術並與業者進行互動，才能提高新型態金融業務的使用率，降低客戶與業者之間的代溝。

63

Question

金融商品的多樣性時常造成網站平台的資訊量過多，如何讓金融商品的尋找、購買流程更加快速、直覺？

Perspectives

金融商品的多樣性時常造成網站平台的資訊量過多，部分網站的設計使消費者需要繁瑣地來回進行點選、尋找、跳出等動作，才能閱讀到產品介紹，造成消費者無法順暢的選出合適商品並完成購買手續。建議業者在介紹金融商品的通路管道都應以客戶為中心 (Customer-centric)，加強客戶體驗設計，簡化相關流程，讓金融商品的尋找、購買更加快速、直覺。

62

Question

How can governments and participants let consumers understand new forms of financial businesses and encourage the use of emerging technologies?

Perspectives

With the rapid rise and development of FinTech, companies or financial operators need the support of the regulatory authorities when introducing relevant technology or formulating relevant regulations to ensure the soundness of the financial business, maintain market stability and promote the development of future markets. The regulatory authority and related financial service providers should also work together to carry out decree declarations, provide general consumer financial technology related education and assist consumers in uses more emerging technologies to interact with operators and boost the utilization rate of new-type financial services and reduce the generation gap between customers and the operators.

63

Question

The diversity of financial products often results in an overwhelming amount of information on the website. How can we make the process of finding and buying financial products faster and more intuitive?



Perspectives

The diversity of financial products often results in too much information on the website. The design of some current websites make consumers repeatedly click around and search just to read the product introduction. This causes consumers to be unable to smoothly select appropriate products and complete the purchase procedures. It is recommended that the operators use customer-centric channels for introducing financial products, strengthen customer experience design, simplify related processes and make the search and purchase of financial products faster and more intuitive.

64

Question

金融法規的制定應以保護消費者的權益為優先考量，新型態的金融科技與服務，是否也應該明確地納入消費者金融保護的規範？

Perspectives

過去常因消費者與金融業者之間的資源不對等，導致雙方出現消費糾紛時需藉由金融消費評議中心協助調解並維持雙方的權益。但金融科技業者與新型態的服務出現後，建議主管機關也應明確將其納入消費者金融保護的規範，不能僅靠業者的自律規範。消費者權益的保障不僅只是提供一個完善有效率的爭議解決機制，而更應以保護消費者的權益為優先考量，瞭解消費者的經驗與行動誘因，來作為制定金融消費者保護架構的基礎。提前透過金融法規的制定，以及從各種管道持續保障消費者，建立大眾正確的金融消費觀念，以達到「事前預防」勝於「事後解決」之目的。

65

Question

金融業者及新創業者如何有效利用社群媒體及數位通路，建立消費者溝通管道？



Perspectives

隨著社群媒體、數位通路的多元化，業者與消費者的接觸點越來越多，除了平時的行銷互動以外，金融及新創業者如何有效利用這些管道或是技術，建立良好且順暢的消費者溝通橋梁？對於客戶的意見回饋，應快速且明確的給予回應，保持順暢溝通，傾聽、瞭解客戶的意見及聲音；也建議業者成立相關專責單位進行資料分析、改善或導入客戶改善指標、機制，讓客戶充分感受到業者的同理心。

64

Question

The formulation of financial laws and regulations should give priority to the protection of consumers' rights. Should new-type financial technologies and services also be explicitly included in the consumer financial protection regulations?



Perspectives

In the past, due to the unequal resources between consumers and financial operators, when consumer disputes occurred, the Financial Ombudsman Institution mediated and maintained the rights of both parties. However, after the emergence of FinTech companies and new-type services, it is recommended that the regulatory authority should also clearly include them in the regulations for consumer financial protection and cannot rely solely on the self-regulation of operators. The protection of consumer rights is not only to provide an efficient dispute resolution mechanism, the experience and incentives of consumers should be understood as the basis for formulating financial consumer protection purchases. Through the formulation of financial regulations and the continuous protection of consumers from various channels in advance, the correct concept of financial consumption will be established to achieve the purpose of "preventing in advance" rather than "resolving afterwards."

65

Question

How do financial operators and startups effectively use social media and digital channels to establish consumer communication channels?

Perspectives

With the diversification of social media and digital channels, there are more and more contact points between operators and consumers. In addition to the usual marketing interactions, how can financial operators and startups use these channels or technologies effectively to build a smooth consumer communication bridge? Respond quickly and clearly to customer feedback, maintain smooth communication, and listen to and understand customer opinions and suggestions; it is also recommended that operators establish relevant units for data analysis, improvement or introduction of customer improvement indicators and mechanisms, so that customers can fully feel the empathy of the operator.





6 監理科技 Regulatory Technology

指利用科技方法，促進金融服務業者更有效地達成監管和合規的目的。主要討論監理沙盒的條件、監管科技的建置、標準議題，本面向共有 12 題。問題重點包括：政府如何協助中小型業者導入監管科技；監理沙盒的條件門檻、審查效率如何改善，以發揮最大效益；徵信及風險資料庫的建置與串接使用。

Refers to the use of technological methods to promote financial service providers to more effectively achieve its intended goal of regulatory compliance. It mainly discusses the conditions of the regulatory sandbox, the establishment of regulatory technology, and standard issues. There are 12 issues in total. The key issues include how the government assists small and medium-sized enterprises to introduce regulatory technology, how to improve the review efficiency and barrier of regulatory sandbox to maximize the benefits, and the establishment and streaming of credit information appending to risk databases.

66

Question

隨著金融科技的蓬勃發展，金融服務的提供者與一般產業之間的界線不再如此明確，是否應更加重視跨產業、跨國際的監理發展？

Perspectives

傳統的金融監理雖然複雜，但其仍圍繞在金融產業間的不同業務範疇進行監理，但隨著金融科技的蓬勃發展，金融服務的提供者開始跨足電信、零售、科技等其他產業。因此跨產業的監理機制、法規調整與權責主單位的部門整合問題，都是政府單位要持續努力的議題。同時，金融也是高度國際化的產業，全球金融市場都可能相互影響，過去多專注金融機構的跨國經營所產生的監理議題，然而網路無國界的特性使得現在的金融服務不受國界或地理疆域的限制，例如虛擬貨幣、P2P平台，未來的跨國監理也將是一大挑戰。

67

Question

隨著法令的複雜化與科技的多元化，政府是否有統一建置相關法律、風險資料庫的可能？



Perspectives

法令遵循、洗錢防制等內部控制機制已成為現今金融服務提供業者的營運重點，也是主管機關主要監管與查核的項目。許多金融科技業者亦積極建置相關機制系統與資料庫，但中小型業者因成本及資源等考量之下，影響建置意願與能力，不易導入法令遵循相關系統及資料庫。政府是否有相關配套措施引導業者導入監管科技，降低中小企業導入門檻，或者是直接由政府集中統一建置全國性的法令遵循相關系統及資料庫的可能？

66

Question

With the rapid development of FinTech, should we pay more attention to the development of cross-industry and international supervision?



Perspectives

Although traditional financial supervision is complicated, it still focuses on different business scopes of the financial industry. However, with the vigorous development of FinTech, financial service providers have begun to step into other industries such as telecommunications, retail and technology. The cross-industry supervision mechanism, regulatory adjustments and the integration of primary authorities are all issues that government units should continue to work hard on. At the same time, finance is also a highly internationalized industry, and global financial markets may influence each other. In the past, we focused more on the supervision issues arising from the transnational operations of financial institutions. However, the characteristics of the Internet without borders make the current financial services not subject to national borders or geographical boundaries. For example, cryptocurrency and P2P platforms will also be a big challenge in terms of multinational supervision.

67

Question

With the complication of laws and regulations and the diversification of technology, is it possible for the government to uniformly establish relevant laws and risk databases?

Perspectives

Although traditional financial supervision is complicated, it still focuses on different business Internal control mechanisms, such as compliance with laws and regulations as well as money laundering prevention have become the operational focus of service providers today and are also the main supervision and verification items of the regulatory authorities. Many financial operators actively build related mechanisms, systems and databases. However, due to cost and resource considerations, willingness and ability of small and medium-sized companies, it is not easy to introduce laws and regulations to follow related systems and databases. Does the government have relevant supporting measures to guide participants to introduce regulatory technology to lower the threshold for small and medium-sized enterprises, or is it possible for the government to centrally build national laws and regulations to follow relevant systems and databases?

68

Question

主管機關如何運用監管科技發展，達到系統面、資安面、資料保護面的有效管理？



Perspectives

監管科技除了一般熟悉的外部客戶或服務行為的徵兆管理，也有很大一部分的使用範圍在於組織內部監管。主管機關如何運用監管科技發展，達到系統面、資安面、資料保護面的有效管理，包含建立資訊安全防護機制、監控系統架構穩定及資安保護的內控稽核機制等議題，都是未來發展監管科技重點。

69

Question

監理沙盒的進入門檻是否能有更細緻的分類分級，給予不同風險的業者不同的授權，以鼓勵更多金融科技業者投入創新？

Perspectives

監理沙盒提供金融相關業務或法律規範尚未明確的新創業者，一個風險規模可控制的環境，讓其能在主管機關監理之下進行實驗，測試創新產品、服務或商業模式。並暫時享有法規的豁免權，同時透過與監管者合作，共同解決在測試過程中發現或產生的監理與法制相關議題。然而現行金融監理沙盒的門檻分級較為粗略，許多新創業者無法符合規定，導致進入監理沙盒的新創業者較少。是否能提升門檻分級的細緻度，給予不同風險的業者不同的授權，降低其進入金融監理沙盒的難度？

68

Question

How can the regulatory authority use technology development to achieve effective management of system, security, and data protection?

Perspectives

In addition to the generally familiar management of external customers or service behaviors, regulatory technology also has a large part of its application for internal organization supervision. Perhaps regulatory authorities can use the development of regulatory technology to achieve effective management of the system, security and data protection, including the establishment of information security protection mechanisms, the stability of the monitoring system structure and the internal control audit mechanism for security protection.

69

Question

Can the entry threshold for regulatory sandbox have a more detailed classification through giving different authorization levels to different risk operators in order to encourage more FinTech companies to invest in innovation?



Perspectives

The regulatory sandbox provides startups whose financial related business or legal regulations are not yet clear with risk-controllable environments, allowing them to conduct experiments under the supervision of the regulatory authority, test innovative products, services or business models, and temporarily enjoy statutory immunity. They can also work with regulators to resolve issues related to supervision and legal issues discovered or generated during testing. However, the threshold classification of the financial regulatory sandbox is relatively high, and many startups are unable to meet the regulations. Is it possible to increase the granularity of the threshold classification, give different authorizations to participants with different risks, and reduce the difficulty of entering the financial regulatory sandbox?

70

Question

金融服務業者、新創業者之風險資料庫，是否可與金融聯合徵信中心互相串接，以充實資料庫之完整性？



Perspectives

金融聯合徵信中心為我國信用資料庫的中立角色，其自身並不運用資料從事放款等信用交易或其他營利性的行為。金融聯合徵信中心所建置的信用資料，是從各金融機構依規定所報送彙整而來，其客群來源多是以傳統金融業者往來的客戶資料為主。而市場上新興的金融科技服務業者以及新創業者的使用客群，有許多非傳統金融用戶，若是能利用技術將兩者之間的徵信資料、風險資料庫相互流通，在同一平台上進行管理，將可以更加豐富國內的徵信資料庫。

71

Question

法令遵循的監管科技的成本相當高，主管機關是否有相關推廣方案，以提高業者導入應用的意願？

Perspectives

現行監管科技最廣泛的應用領域為洗錢防制或資恐防制，利用新科技（人工智慧、演算法、生物辨識、雲端計算與區塊鏈等）與分析方法提供法令遵循及監管的有效解決方案，協助企業控管風險。但法令遵循的監管科技的成本相當高，目前大型企業較有機會導入，資源不足的中小型企业則較難，又導入監管科技對於公司營運績效較無直接連結，影響其意願。因此主管機關是否有相關政策，引導金融科技相關新創業者或金融業者，投入相關技術與產業應用，為監管科技推廣的重要挑戰。

70

Question

Can the risk database of financial service providers and startups can be connected with Joint Credit Information Center to enrich the integrity of the database?

Perspectives

The Joint Credit Information Center plays a neutral role in Taiwan's credit database. It does not use the data to engage in credit transactions such as loan or other profit-making activities. The credit information built by the Joint Credit Information Center is obtained from various financial institutions by data collection according to regulations. The source of its customer base is mostly based on customer data from traditional financial companies. Most of clients of emerging FinTech service providers and startups are non-traditional financial users. If the use of technology can circulate the credit information and risk database between the two and manage it on the same platform, it will enrich the domestic credit information database.

71

Question

The cost of supervising technology followed by laws and regulations is quite high. Does the government have relevant regulatory technology promotion plans to increase the willingness of participants to introduce applications?



Perspectives

Current regulatory technology is mostly applied to money laundering prevention or terrorism financing prevention, using new technologies (artificial intelligence, algorithms, biometrics, cloud computing and blockchain etc.) and analytical methods to provide solutions for compliance with laws and regulations. However, the cost of regulatory technology for compliance with laws and regulations is quite high. At present, large enterprises are more likely to introduce them. On the contrary, SMEs with less resources have more difficulty adopting it. The introduction of regulatory technology has no direct impact on the operator's operating performance and links. Therefore, whether the regulatory authority has relevant promotion policies to guide financial operators or FinTech startups to invest in regulatory technology such as internal control technology, financial technologies and industrial norms, will be important challenges.

72

Question

目前的監理大多透過事後報表及數據，但這些多屬於落後指標，如何能夠透過實時風險分析來建立早期預警系統？

Perspectives

目前主管機關對於業者提出的金融監理要求多屬事後監督，透過事後報表及數據瞭解受檢機構內部控制的運作情形以及風險管理的現況，進而提出相關檢查意見、改善要求等。然而金融危機所造成的社會成本甚鉅，若能提早發現風險所在，將能大幅降低危害，現行全球各國也希望透過技術與監理面向的結合，更有效針對風險進行偵測、分析，並逐步達成監理的預警系統。主管機關應針對整體金融監理制度進行系統性診斷，透過實時風險分析，發展早期預警系統將以提升監理效能。

73

Question

如何提升監理沙盒的審查會議效率，減少相關行政流程的等待時間？



Perspectives

監理沙盒的概念在賦予業者於安全空間測試其金融創新產品、業務、商業模式，金融監督管理委員會依條例之授權，兼顧創新性、公平性、消費者權益保護、資訊安全及相關風險控管等原則下，完成相關授權法規命令之訂定及完備監理配套措施。因此於審查過程中將邀集新創科技業者、金融業者及相關權責主管機關充分參與討論，檢視業者需求及業務發展趨勢。但相關審查、行政流程的等待時間過久，應思考如何提升監理沙盒的審查會議效率，加速監理沙盒的運作。

72

Question

Most of the current supervision uses post-mortem reports and data, but in fact these are backward indicators. How can an early warning system be established through real-time risk analysis?



Perspectives

At present, the regulatory authority's financial supervision requirements raised by participants are mostly post-event supervision which is to realize the operation status of the internal control of the inspected institution and the current status of risk management through the post-event reports and then propose relevant improvement requirements. However, the social costs caused by the financial crisis are huge. If the risks are discovered early, the harm will be greatly reduced. The countries around the world also hope that through the combination of technology and supervision, they can more effectively detect and predict risks, and gradually achieve early warning system for supervision. The regulatory authority should conduct a systematic diagnosis of the overall financial supervision system and develop an early warning system through real-time risk analysis to enhance the effectiveness of supervision.

73

Question

How to improve the efficiency of the regulatory sandbox review meeting and reduce the waiting time of relevant administrative processes?

Perspectives

The concept of regulatory sandbox is to empower the participants to test its financial innovation products, business and business model in a safe space. The principles of innovation, fairness, consumer rights protection, information security and related risk control that follows the authorization from FSC complete the stipulations of relevant authorization laws and regulations and complete supporting measures for supervision. Therefore, during the review process, FinTech startups, financial operators and related authorities will be invited to fully participate in the discussion to review the needs of participants and business trends. However, the waiting time for the relevant review and administrative process is too long, and we should think about how to improve the efficiency of the review meeting of the regulatory sandbox and speed up the operation of the regulatory sandbox.

74

Question

是否應將金融科技業者納入金融聯合徵信中心或相關信用資料庫的使用範圍，透過資料開放政策以落實風險評估？



Perspectives

政府應改善資料開放政策，將金融科技業者納入聯合徵信或相關信用資料庫的使用範圍，開放給所有金融服務業者，而不應侷限於傳統金融業者。協助金融服務業者與金融科技新創業者在法令遵循的過程中，能更蒐集到完整的資訊，降低整體金融市場的風險，若主管機關有資料風險控管的疑慮，亦可以制定審查機制，符合一定標準者才能使用。

75

Question

監管科技為了分析與管理，可能接觸大量隱私數據，如何在個人資料保護的前提下，達到合理利用以提升監管的效率？

Perspectives

監管科技利用資訊技術，整合監理制度與法規要求，提供分析與管理的工具，當中可能會接觸並運用到個人資料執行法令遵循管理。隨著個人資料保護的意識提升，如何在避免人格、隱私權受侵害的前提下，促進資料的合理利用以提升監管科技的效率，例如指紋紀錄、臉部辨識等，仍存有法律及道德爭議。因此主管機關須要求企業組織建立個人資料或資訊安全之管理制度、內部控制或稽核作業程序、規範，亦須針對相關法令規範，做出明確定義。

74

Question

Should FinTech companies be included in the scope of Joint Credit Information Center or related credit database, and the risk assessment implemented through the open data policy?

Perspectives

The government should improve the open data policy and let FinTech companies enter the Joint Credit Information Center or related credit databases, and open them up to all financial service providers, not limited to traditional financial providers. They should Assist financial service providers and financial startups to collect complete information and reduce the overall financial market risk in the process of compliance with laws and regulations. If the regulatory authority has doubts about data risk control, it can also formulate a review mechanism, which can be used if it meets certain standards.

75

Question

In order to analyze and manage technology, supervisory technology may be exposed to a large amount of private data. How can it be rationally used to enhance the efficiency of supervision under the premise of personal data protection?



Perspectives

Regulatory technology uses information technology to integrate supervision systems and regulatory requirements to provide tools for analysis and management. There may be access and use of personal data to enforce laws and regulations. With the increasing awareness of the protection of personal data, it is necessary to focus on how to promote the rational use of data on the premise of avoiding infringement of personality and privacy to enhance the efficiency of regulatory technology. For example, fingerprint records and facial recognition, etc. remain legal and moral disputes. Therefore, the regulatory authority needs to require the enterprise organization to establish a management system, internal control or auditing operation procedures and specifications for personal data or information security. It must also make a clear definition for the relevant laws and regulations.

76

Question

對於洗錢防制法令要求的提升，如何協助從事金融服務的金融科技業者，符合洗錢防制規範？



Perspectives

為了與國際接軌以及通過亞太防制洗錢組織的評鑑，主管機關近年來對於洗錢防制的要求越趨提升，各家金融業者皆投入大量人力物力進行改善，包括成立洗錢防制專責部門單位、招募大量專責洗錢防制與法遵人員等。但對於部分新創公司而言，並沒有這麼多的資源能夠投入洗錢防制的改善，主管機關如何協助從事金融服務的金融科技業者，符合洗錢防制規範？是否能鼓勵第三方專門協助進行洗錢防制之機構產生，例如民間徵信公司、徵信科技公司，透過徵信科技技術協助業者進行風險辨識，也可降低相關業者重覆投入之成本及進入障礙，符合洗錢防制之規範。

76

Question

Laws and regulations for the enhancement of the requirements of the money laundering prevention laws and regulations are rising. How can we assist FinTech companies engaged in financial services to comply with the money laundering prevention regulations?

Perspectives

In order to be in line with the international standards and pass the evaluation of the Asia/Pacific Group on Money Laundering, the regulatory authorities have increasingly demanded money laundering prevention in recent years. Various financial operators have invested a lot of manpower and material resources to improve it, including the establishment of a special responsibility unit as well as recruiting a large number of personnel specifically responsible for money laundering prevention and compliance. However, for some startups, there are not as many resources that can be invested in the improvement of money laundering prevention. How can the authorities assist these companies to comply with money laundering prevention regulations? Perhaps encourage third parties to specifically assist in the creation of money laundering prevention organizations, such as private credit companies and credit technology companies, to help startups identify risks through CredTech technology, and to reduce repeated investment cost and barriers to comply with the regulations for money laundering prevention.



7 保險科技

Insurance Technology

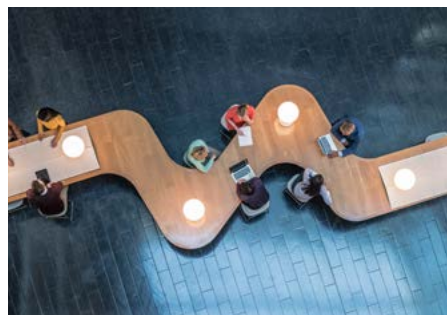
提出如何以新創科技來設計新的保險產品與解決方案、改善流程及營運效率，並提升客戶體驗，本面向共有 14 題。問題重點包括：對保險科技或商品的開放，應積極檢視是否有調整法規空間；如何運用保險科技提升客戶體驗及降低風險；政府是否有相關規範或政策協助保險跨產業的資料串接及整合。

This proposes how to use innovative technology to design new insurance products and solutions, improve process and operational efficiency, and enhance customer experiencing. There is a total of 14 issues. The key issues include the opening of insurance technology or insurance products, whether there is room for regulation adjustments, how to use insurance technology to improve customer experiencing and reduce risks, as well as whether the government has relevant regulations or policies to assist insurance companies in cross-industry data streaming and integration.

77

Question

對於消費者保險資料與醫療資料的串聯、價值鏈的垂直整合，政府是否有相關協調機制與推廣政策？



Perspectives

一般消費者出險後，從提出申請到獲得理賠的時程較長，關鍵在於保戶醫療資料的取得須經過多道申請手續，冗長的行政作業時間造成理賠文件彙整速度較慢。若能夠透過資料價值鏈的垂直整合，將保險資料與醫療資料進行串接，將可提高整體流程效率，有利於消費者的便利性，主管機關對此是否有相關的統整協調機制及政策的推廣。

78

Question

保險科技與智慧醫療的推廣橫跨多種產業應用，亟需政府單位建立相關的法律配套措施以完善產業發展環境。

Perspectives

我國雖有完整的醫療健保體系與資訊與通信科技的優勢，但保險科技與智慧醫療的推廣橫跨許多產業應用，包括醫療產業、軟硬體產業以及串聯金流服務的金融業，所以必須進行跨領域、跨部門的整合。也因為醫療是高度隱私管制的產業，所以有許多法規與適用性的障礙，例如《個人資料保護法》、資安和隱私權、生物資料庫等相關議題，都需要政府單位協助克服，妥善建立資料傳輸、交換的共通性管理架構，打造良好得產業發展環境。

77

Question

Are there any relevant promotion policies for the concatenation of insurance data and medical data, and the vertical integration of value chains to enhance consumer convenience?

Perspectives

When customers have an accident, the time it takes between applying and receiving the claim is quite long. The reason is that the insurer's medical information must be obtained through multiple application procedures. The lengthy administrative operation time causes the consolidation of the claim documents to be slower. Perhaps vertical integration of the data value chain can be used to connect insurance data and medical data, the overall process efficiency and the convenience of consumers will be improved. Does the regulatory authority have any relevant policies to promote this?

78

Question

The promotion of insurance technology and smart healthcare spans a variety of industrial applications, and government agencies are urgently required to establish relevant legal measures to improve the industrial development environment.



Perspectives

Although Taiwan has the advantage of a complete health insurance system and communication technology, the promotion of insurance technology and smart healthcare spans many industrial applications, including the medical industry, hardware and software industry, as well as the connection service of cashflow in the financial industry. It is necessary to integrate across fields and departments. Because medical care is a highly privacy-controlled industry, there are many obstacles to regulations and applicability. For example, the Personal Data Protection Act, information security and privacy rights, biological databases, and other related issues all require government units to help overcome and properly establish a common management structure for data transmission and exchange, and create a good industrial development environment.

79

Question

如何掌握共享經濟之未來趨勢，善用保險科技以有效進入並經營新經濟領域的市場？



Perspectives

微型、個人客製化的保單需求日趨增加，無人 / 自駕車及共享經濟模式興起，打破了傳統保險上一人對一事物的責任歸屬，保險責任歸屬變成模糊，或趨向多人分擔。例如，若無人車於自動駕駛模式下發生事故時，責任歸屬的判定是開發自駕系統的車廠，還是駕駛？共享經濟下的 Uber 或 Airbnb，在投保車險與房屋險時，與投保一般單純使用時的險種，在風險與保費的認定上，是否有所不同？業者可以思考在共享經濟是未來趨勢下，保險科技如何進入新經濟領域的市場，且該扮演什麼角色？

80

Question

是否應提升數位平台或數位方式進行投保與服務的範圍，以提高數位化保險的效率與服務品質？

Perspectives

保險科技的興起，使原有傳統的保險業務也可改用數位線上化直接投保核准，但由於線上作業缺乏業務員的協助與核對，導致數位投保的過程較為簡略。因此目前主管機關放行的投保範圍有限，只有部分的保險商品，例如旅平險、產險等簡單短期之商品可在數位平台進行投保。未來是否有放寬調整的空間，提升數位平台或數位方式進行投保與理賠服務的範圍，以提高數位化保險的效率與服務品質。

79

Question

How to seize the future trends of the sharing economy and make good use of insurance technology to effectively initiate the market in the new economic field?

Perspectives

The demand for miniaturized and custom policies is increasing, and due to the rise of unmanned / self-driving cars and the sharing economy model, the attribution of one person to one thing in the traditional insurance industry is broken. For example, if an unmanned vehicle has an accident in automatic driving mode, does the responsibility belong to the developer of the self-driving system or the driver? Under the sharing economy, when Uber or Airbnb insure cars or houses, will the identification of risks and premiums be different from insurance types that are generally used? Operators can think about how insurance technology enter the new economic field under the future trend, sharing economy, and what role it should play between the two sides of the platform.

80

Question

Should the scope of digital platforms or digital insurance service be improved to boost the efficiency and service quality of digital insurance?



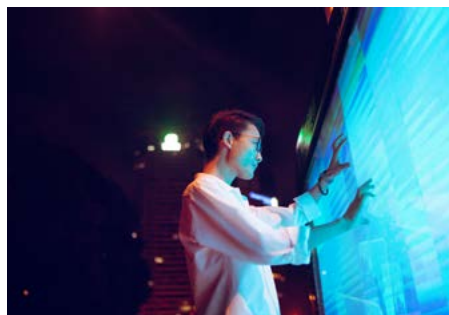
Perspectives

The rise of insurance technology has enabled the original traditional insurance business to be replaced by online buying trend of digital insurance. However, due to the lack of the assistance and verification of salesperson for online operations, the process of digital insurance is relatively simple, and the coverage is limited. Only some insurance products, such as travel insurance, property insurance, and other short-term insurance products, can be insured on digital platforms. In the future, will there be room to loosen limits for digital insurance adjustments and broaden the scope of digital platforms or digital insurance services and claims to improve the efficiency and quality of digital insurance?

81

Question

在保險科技的開放與個人資料保護管理之間，例如生物辨識之應用，如何與時俱進地平衡兼顧？



Perspectives

隨著保險科技的技術提升，國外部份保險業者開始透過生物辨識確認保戶身分，建立生物檔案。但當保險科技收集了大量隱私資料時，如何能確保資料的安全及個資的使用？雖然目前保險的生物辨識在台灣目前尚未普及，但主管機關也應提早思考及規劃，如何在兩者之間取得平衡。是否可能由中央建立資料庫來全面管控隱私資料，以相關法律保護和安全技術為前提，由國家信用來背書，確保不對公民隱私權產生威脅以及保護個資的安全。

82

Question

為了提升民眾購買體驗及保險市場發展，如何善用保險科技，解決現有保險商品資訊複雜或是資訊不對等的現況？

Perspectives

許多保險產品有複雜的條款，一份保單有數十頁的說明，其中還可能涉及醫療、金融等相對較為專業的知識領域，對一般消費者而言難以快速理解和接受。消費者與保險公司之間在沒有互信基礎之下，業者在銷售與理賠過程中須花費較多的溝通成本，造成消費者購買產品的過程相對冗長、繁複，客戶滿意度下降，同時也影響了保險市場的發展。因此，如何應用保險科技來解決現有保險商品資訊複雜或是資訊不對等的現況，協助民眾快速了解，讓資訊更透明、搜尋更方便，是業者與主管機關需要共同思考的問題。

81

Question

How can we keep pace with the times and balance the opening of insurance technology and the management of personal data protection?

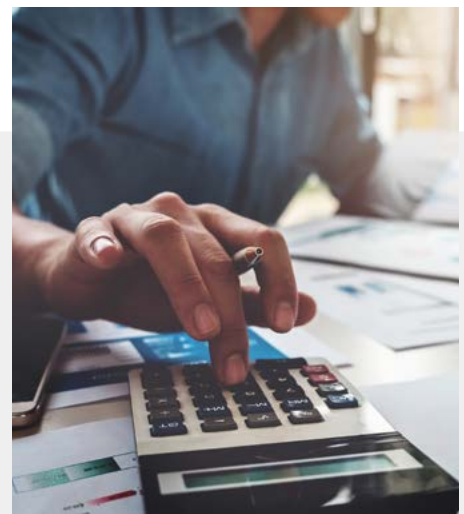
Perspectives

With the advancement of insurance technology, some foreign insurance companies have begun to confirm the identity of insured persons through biometrics and establish biological files. But when insurance technology collects a large amount of private data, how can we ensure the safety of the data and the use of personal resources? Although biometric insurance is not yet popular in Taiwan, the regulatory authorities should plan ahead of time to strike a balance between two sides. Is it possible for the central government to establish a database to fully control private data based on the relevant legal protection and security technology and relying on national credit to endorse and ensure that it does not threaten citizens' privacy rights and protect the security of personal data?

82

Question

In order to improve the purchasing experience of the public and the development of the insurance market, how can we make good use of insurance technology to solve the current situation that the information of existing insurance products is complex or unequal?



Perspectives

Many insurance products have complicated terms. A policy has dozens of pages of instructions, often involving relatively professional knowledge, such as medical care and finance, which are difficult for the general consumer to quickly understand and accept. Without mutual trust between consumers and insurance companies, operators must spend more communication costs in the process of sales and claims settlement. The process for consumers to purchase insurance products is relatively lengthy and complicated, reducing customer satisfaction and also affecting the development of the insurance market. Therefore, how should insurance technology be applied to solve the current situation of complex or unequal information of existing insurance products, to help the public to quickly understand, to make the information more transparent and to facilitate convenient search are issues that both operators and the competent authorities need to think about together?

83

Question

如何持續強化線上自動化管理的便利性，以追求速度更快、準確性與透明度更高的金融科技保險服務？

Perspectives

傳統保險購買流程複雜，故需要經過業務人員的協助，然而在金融科技的幫助下，業者已把許多服務都改為線上自動化，以創建更好的交易環境。例如線上自動化管理速度比傳統更快、準確性與透明度更高，透過線上申請繳交文件就可以審核，或透過手機就能隨時查看繳費狀況。主管機關應持續鼓勵業者，業者也應努力發展數位自動化服務，提升操作流程的順暢度，以有效應用金融科技帶來的便利性。

84

Question

隨著保險科技進步及法規的開放，政府及業者如何幫助與教育消費者，了解並接受新的消費思維與行為？



Perspectives

台灣的保險科技開始起步成長，然而這些金融服務的推廣仍處於早期階段，消費者是否能接受並改變原有的消費習慣，將是保險科技的成長關鍵。保險市場上的消費者族群多元、年齡分布廣大，例如透過網路社群與智慧型手機聯繫的「數位原住民」世代崛起，此世代對於保險業者是否可以提供高可及性、低成本與高便捷性之網路通路有相對較高之要求。因此，業者與政府於積極推動保險科技發展的同時，亦須需要開始思考如何幫助與教育不同年齡層消費者思維與行為的改變。

83

Question

How can we continuously enhance the convenience of online automated claims settlement in order to pursue faster, more accurate and transparent financial technology insurance services?



Perspectives

The traditional insurance purchase process is complicated and requires the assistance of business personnel. However, with financial technology assistance, operators have changed many services to online automation to create a better buying environment. For example, online automated claims settlement is faster, more accurate and more transparent than traditional ones. Payment documents can be reviewed through online applications or checked on the phone at any time. Regulatory authorities should continue to encourage operators, and operators should also strive to develop digital automation services to improve the smoothness of the operation process in order to effectively apply the convenience brought by financial technology.

84

Question

With the advancement of insurance technology and the opening up of regulations, how can the government and participants educate consumers to better understand and accept new consumer thinking and behaviors to optimize the market?

Perspectives

Insurance technology in Taiwan has begun to grow, but the evolution of these financial services is still in the early stages. Whether consumers can accept and change their original consumption habits is also the key to the growth of insurance technology. Insurance consumers are diverse and have a wide age distribution, for example the generation of "digital natives" who are familiar with smartphones and the internet community has gradually risen. This generation has relatively high requirements for whether insurers can provide high accessibility, low cost, and high convenience of network access. While operators and the government are actively promoting the development of insurance technology, they also need to start thinking about how to help and educate consumers of different ages to change their thinking and behavior.

85

Question

保險數位化的目的之一是為了提高客戶保險的體驗數位服務，例如身分驗證，主管機關與業者該如何持續提供優化服務？

Perspectives

由於行動裝置普及、遠端訊息處理技術等發展，保險業開始推動線上投保。為了提升投保流程數位化的公信力與資安的保護，不少業者推出先在網路完成申辦手續，最後再透過實體讀卡機及自然人憑證驗證即可完成作業的網路身分認證機制，打破了時間與空間限制。但由於網路交易仍有其不確定性，消費者會擔心線上身分認證機制的公信力，也不是每位消費者都有實體讀卡機及自然人憑證。業者可以再多思考如何提升消費者驗證的方便性，希望主管機關也能推出更先進的網路身分認證機制。

86

Question

隨著外部的環境而快速改變，保險公司應與時俱進，提供多元保險商品的內容與定價的方式。



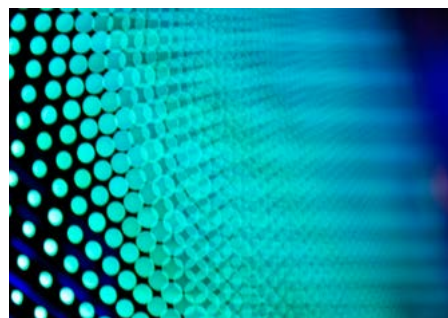
Perspectives

科技技術的進步，消費者的生活模式也隨之改變，對於保險需求也有不同的期待，例如能根據開車駕駛不同路面、時段、行為習慣，隨時調整計算不同的保費，在國外市場就非常火紅。也有越來越多的保險科技公司提供更新穎、更切合需要的保單內容與平台，擺脫以往傳統的保單類別或依年度時間的承保方式。保險公司應與時俱進，投入即時、依需求之承保範圍的產品開發，以提供多元保險商品的內容與定價方式給消費者。

85

Question

One of the purposes of insurance digitalization is to improve customers' successful experience in digital insurance services. How should the government and operators continue to optimize services?



Perspectives

Due to the popularity of mobile devices and the development of remote information processing technologies, the insurance industry has begun to promote online insurance. In order to improve the credibility of the digitalization of the insurance process and the protection of information security, many operators have launched a network identity authentication mechanism that completes the application process online first, and then completes the operation through card reader or natural person certificate verification, breaking the time with space restrictions. However, due to the uncertainty of online transactions, consumers will worry about the credibility of the online identity authentication mechanism, and not every consumer has a physical card reader and a natural person certificate. Operators can consider how to improve the convenience of consumer verification, and regulatory authorities can also have a more advanced network identity authentication mechanism.

86

Question

With the rapid changes in the external environment, insurance companies should keep pace with the times and provide diverse content and pricing methods for insurance products.

Perspectives

With the advancement of technology, consumers' lifestyles have also changed, and they have different expectations for insurance needs. For example, they can adjust and calculate different premiums at any time according to different road surfaces, time periods and behavior habits of driving. There are also more and more insurance technology companies that provide newer and more suitable policy content and platforms to get rid of traditional policy types or underwriting methods based on annual time. Insurance companies should also keep pace with the times and invest in product development with immediate and demand-based coverage to provide consumers with multiple content and pricing methods for insurance products.

87

Question

如何善用保險科技，讓數位化投保及後續相關服務過程無縫整合，提升民眾的服務整體滿意？



Perspectives

目前保險業者已不斷簡化投保流程，例如直接在網路上投保簡單的旅平險、意外險等，部分保險業務也可直接通過行動數位化的確認，例如客戶保單地址的變更、壽險的保單借款、保單解約等項目。然而現行仍有些許流程需要紙本蓋章或簽名認可核准。如何善用保險科技，讓投保過程無縫整合，甚至達到全無紙化的可能，提升民眾便利的服務體驗。

88

Question

在發展保險科技的同時，如何強化人機協作系統的有效性，補足人工判斷案件風險不足的評估？

Perspectives

可自動執行人工作業的流程機器人與人工智慧現正迅速滲透保險產業，改變或減少勞動密集型職缺可以降低公司營運成本，但因為沒有業務員在第一線進行親臨判斷，也少了一道風險的控管機制。業者在發展保險科技的同時，如何補足此風險落差？是否需要加強過濾風險的機制，針對工作內容進行分析與判斷，哪些項目應予自動化，哪些項目仍由人工審核。利用人機協作的方式使得企業科技升級同時也提供消費者信賴感，並減少風險產生的機會。

87

Question

How to make good use of insurance technology to seamlessly integrate the digital insurance and follow-up related service processes to improve the overall satisfaction of the public?

Perspectives

At present, insurance companies have continuously simplified the insurance process, such as simple and online application of travel insurance and accident insurance, and some insurance businesses can also be directly confirmed through digitalization of actions, such as the change of customer policy address, life insurance policy loan, policy cancellation and other items. However, there are still some processes that require paper stamping or signature approval. For example, when the guarantor is a legal person, you need to affix a company seal to certify the process of paperwork in order to protect the company's rights and interests. How to use insurance technology to make the insurance process seamlessly integrated and even achieve the possibility of being completely paperless, enhancing the convenient service experience of the public?

88

Question

While developing insurance technology, how to strengthen the effectiveness of the human-machine collaboration system and complement the assessment of the lack of manual judgment of case risk?



Perspectives

Robotic Process Automation and artificial intelligence that can automatically perform manual operations are now rapidly penetrating the insurance industry. Changing or reducing labor-intensive vacancies can reduce the company's operating costs, but because there is no salesperson to make personal judgments on the front line, there is less risk control mechanism. While developing insurance technology, how do companies make up for this risk gap? Is it necessary to strengthen the risk filtering mechanism, analyze and judge the work content, which items should be automated, and which items are still subject to manual review? The use of human-robot collaboration allows companies to upgrade their technology while also providing consumers with a sense of trust and reducing opportunities for risks.

89

Question

隨著技術提升，主管機關與業者如何共同努力，協助創新保險商品的開放，以滿足更多民眾需求？

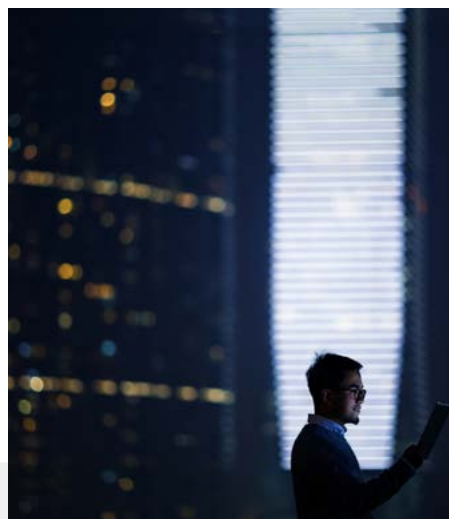
Perspectives

隨著社會、經濟與技術不斷變化，民眾也產生新的保險需求，但現行部分國外的創新保險商品或服務模式在台灣還無法上架販售。建議主管機關應持續提高對於創新保險商品種類及類型的開放態度與審查效率，來鼓勵保險公司積極開發多元保障型保險商品或創新服務機制。而保險公司則應做好風險控管、技術到位與行銷推廣，持續引進利基商品以保持競爭實力，以滿足社會大眾之需求。

90

Question

保險科技的發展與監管息息相關，如何建立既符合監管要求，又符合保險創新原則的保險科技生態系統？



Perspectives

政府在鼓勵業者投入金融科技創新及研發保險商品，推動保險業轉型的同時，亦須考量保險科技的監管機制，保險相關的法規以及監管機制，將影響保險市場的發展及保險科技所能發展的產品內容。因此監管機制須適當的調適與修正以保障市場的健全，並同時協助保險科技的創新發展。部分保險市場較開放的國家都正積極進行保險科技與數位金融結合，創造更多創新服務模式，並建立對應的監管機制。然而各國保險監理法規不同，推出的保險科技都有所不同，建議主管機關可學習與參考國外的作法，並因地制宜的調整以符合在地化。

89

Question

With the improvement of technology, how can the regulatory authority and the operators work together to help open up innovative insurance products to meet more people?



Perspectives

With the continuous changes in society, economy, and technology, the public has also created new insurance needs. However, some of the current foreign innovative insurance products or service models are not yet available in Taiwan. Regulatory authorities should continue to open up and improve their attitude towards innovative insurance products and review efficiency to encourage insurance companies to actively develop multiple-protection insurance products or innovative service mechanisms. Insurance companies should do a better job in technology and marketing promotion, as well as introduce niche products to maintain competitive strength and meet the general public.

90

Question

The development of insurance technology comes hand in hand with regulations. How can we establish an insurance technology ecosystem that meets both regulatory requirements and insurance innovation principles?

Perspectives

While encouraging the participants to invest in FinTech innovation and research and development of insurance commodities to promote the transformation of the insurance industry, the government must also consider the supervision mechanism of insurance technology. Insurance-related regulations and regulatory mechanisms will affect the development of the insurance market and the product content that insurance technology can develop. Therefore, the regulatory mechanism must be appropriately adjusted and revised to protect the sound market and at the same time assist the innovation and development of insurance technology. Some countries with more open insurance markets are actively integrating insurance technology with digital finance to create more innovative service models and establish corresponding regulatory mechanisms. However, different countries have different insurance supervision regulations and different insurance technologies. It is recommended that the competent authorities can learn and refer to foreign practices and adjust them according to local conditions to suit localization.





8 普惠金融 Inclusive Finance

討論如何有效的能為社會所有階層和群眾提供金融服務，特別是金融弱勢群體提供金融服務的思維、方案和保障措施等。本面向共有 10 題，重點包括：如何改善弱勢族群的金融服務環境，落實普惠金融；新型態服務的營運模式管理以及信用評等資訊開放；政府如何協助新創企業成長，解決營運問題。

This discusses how to effectively provide financial services to all social groups, especially economically disadvantaged groups, as well as how to provide financial service schemes and safeguards. There are 10 issues in this topic, focusing on how to improve the financial service environment for vulnerable groups and implement financial inclusion, the operation mode management of new-type services, the opening of credit rating information, and how the government can assist startups in growth and solving operational problems.

91

Question

金融聯合徵信的風險評估標準應該一致，其服務對象不應只是金融業者，而是所有提供金融服務的業者都應該同時考慮。

Perspectives

現行消費者若要與銀行貸款，銀行會向金融聯合徵信中心調閱消費者的借貸狀況及信用資料，以計算消費者的信用評分，進而提供貸款額度、利率等條件。但一般民間借貸以及 P2P 借貸平台提供的貸款資料並無與金融聯合徵信中心串聯，因此若消費者曾有發生違約事件（如未按約定繳款、具呆帳紀錄），金融科技業者無法直接由金融聯合徵信中心提供的資訊查詢相關紀錄，市場產生呆帳風險的機率則會提高。因此建議主管機關對於徵信風險評估標準應該一致，將所有提供金融服務的業者都應該同時列入考慮。

92

Question

部分傳統的金融服務有一定條件限制，政府如何協助創新金融科技服務改善現有的信用管理以及環境條件？



Perspectives

傳統的金融服務有一定條件限制，例如借貸放款，對於弱勢族群可能因為教育資源不足或缺乏信用教育，導致後續的信用條件不佳，無足夠資訊進行徵信審核與信用評估，最後難以取得銀行提供的借貸服務。政府如何改善現有的信用管理體系以及打造善良環境，讓弱勢族群取得所需之金融服務？避免弱勢族群為解決資金需求，被迫轉向地下高風險的民間借貸服務，而衍生後續社會問題。

91

Question

The risk assessment criteria of the Joint Credit Information Center should be consistent, and the service target should not only be the financial industry, but all financial services providers.



Perspectives

If current consumers want to take a loan from banks, banks will review the consumer's loan status and credit information from the Joint Credit Information Center to calculate the consumer's credit score to provide conditions such as loan amount and interest rate. However, general private lending and loan information provided by P2P lending platforms cannot be connected with the Joint Credit Information Center. Therefore, if consumers have defaulted in the past (such as not paying according to the agreement, with bad debt records) etc., the FinTech companies cannot directly query the relevant information from the information provided by Joint Credit Information Center, and the probability of generating bad debt in market will increase. Therefore, it is recommended that the regulatory authority's credit risk assessment standards should be consistent, and all providers of financial services should be considered at the same time.

92

Question

Some traditional financial services have certain restrictions. How can the government assist innovative financial technology services to improve existing credit management and environmental conditions?

Perspectives

Many current financial services have certain restrictions, such as lending and loans. For vulnerable groups, due to insufficient educational resources and lack of credit education, the subsequent credit conditions are not good. There is not enough information for credit review and credit evaluation. Finally, it is difficult to obtain a bank loan service. The government should improve the existing credit system and create a kind environment where disadvantaged groups can obtain the financial services they need, preventing them from being forced to turn to underground high-risk private loan services to solve the financing needs and subsequent social problems.

93

Question

對於無法順利取得金融機構提供的產品與服務的族群，主管機關如何解決其無所得證明及擔保品保障之困擾？

Perspectives

傳統銀行挑選客戶有其門檻限制，許多消費者無法順利取得金融機構提供的產品與服務。無法和銀行往來的族群泛指無法使用銀行服務的個人或是企業，政府該如何協助他們解決無法取得所得證明，或是沒有擔保品保障的問題？建議應以協助其提供金融機構進行信用評估的資料，順利取得金融機構提供的產品與服務為目標，降低無法和銀行往來的人數。

94

Question

關於偏鄉地區與原住民族群，政府單位如何協助取得良好的金融服務及產品資訊，以達普惠金融之目的？



Perspectives

普惠金融是指一個能有效的為社會所有階層和群眾提供服務的金融體系，而金融科技的發展多以都會區、商務族為主力發展客群。公部門如何確保偏鄉地區與原住民族群，取得良好的金融服務及或產品資訊，不因新型態的服務而被邊緣化。可否透過數位裝置及機構的設立，能使其享有和市區一致且無縫的金融服務，並透過提升教育環境資源、教導正確的金融知識與行為，達到讓每個人都能平等且隨時隨地可取得應該有的普惠金融目的。

93

Question

For groups that cannot successfully obtain the products and services provided by financial institutions, how can the regulatory authority solve the problem of them not having proof of income and guarantee of collateral?



Perspectives

Traditional banks have their thresholds for screening customers, and more and more consumers are unable to successfully access products and services provided by financial institutions. These groups generally refer to individuals or enterprises that cannot use banking services. How can the government help them solve the problem of not being able to obtain proof of income or lack of guarantee of collateral? It is recommended that the aim should be to provide information for credit evaluations to obtain products and services from financial institutions successfully and reduce the number of ethnic groups unable to communicate with banks.

94

Question

Regarding groups in rural areas and indigenous ethnic groups, how can government units assist in obtaining good financial services and product information for the purpose of inclusive finance?

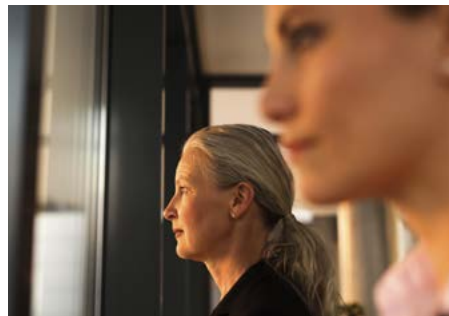
Perspectives

Inclusive finance refers to a financial system that can effectively provide services to all classes and people of society, while the development of FinTech mostly focuses on the development of customer groups in metropolitan areas and business communities. Government should think about how to help rural and indigenous groups obtain good financial services and/or product information. Whether through the establishment of digital devices and institutions, groups in rural areas and indigenous groups should be able to enjoy consistent and seamless financial services similar to those in urban areas; by improving educational environment resources and teaching correct financial knowledge and behavior, so that everyone can be equal to obtain financial service anytime and anywhere to reach inclusive finance.

95

Question

金融科技的發展或設計多以年輕人為出發，政府是否也應注重年長者及身心障礙族群的權益？



Perspectives

現行金融科技的使用者以青壯年人為主，其商品或服務設計僅從一般人角度出發，甚少考慮年長者及身心障礙族群在使用上的不便，不熟悉或無法操作數位工具的族群，較不易受惠於金融科技所提供的新型態服務。政府與金融機構也應注重該族群的權益，例如要求加強硬體設施的建置、更友善的互動方式、聽力、視力及操作上的特別協助以及推出適合的商品服務。以推動普惠金融為目標，打造一套全方位的思維，特別是為弱勢群體提供金融服務方案和保障措施。

96

Question

主管機關是否可以調整信用評等機構的服務及使用對象，以建立更完善的信用評等資料庫？

Perspectives

目前經主管機關認可之信用評等機構僅對於「金融機構有服務的個人或公司」提供服務。如果平時沒有和金融機構往來，將會被排除在信評之外成為信用小白，以至於無法取得其他金融服務，變成普惠金融推動的一道阻力，業者要拓展該族群業務時風險也會提高。主管機關應加速數據的開放，透過資料串接，整合公部門更多非傳統金融資料，例如稅務紀錄、車籍紀錄、勞健保、規費繳納紀錄等，作為信用評等參考，增加信用評等機構的服務對象，建立更完善與完整的信用評等資料庫，協助更多客群獲得借貸與支付等金融服務。

95

Question

The development or design of FinTech is mostly based on young people. How can the government pay better attention to the rights of the elderly and people with disabilities?

Perspectives

Currently, the development of FinTech is mostly targeted towards young people, and the design of its products or services is focused on the perspective of the average person. It does not consider the inconvenience of the elderly and the handicapped and mobility challenged groups at the same time. Those who are unfamiliar with or unable to operate digital tools are less susceptible benefited from the new services provided by FinTech. Governments and financial institutions should also pay attention to the rights and interests of this group, such as requesting the establishment of hardware facilities, more friendly interaction methods, special assistance in hearing and operation, and the introduction of suitable products to promote the goal of inclusive finance, schemes, and safeguards to provide financial services to all members of society, especially financially disadvantaged groups.

96

Question

Is it possible to adjust the service targets of credit rating agencies and establish a more complete credit rating database?



Perspectives

At present, the credit rating agencies approved by the regulatory authority only provide services to "individuals or companies served by financial institutions". If they do not normally interact with financial institutions, they will be excluded from the credit rating and become credit novice. Obtaining other financial services has become a resistance to the promotion of inclusive finance, and the risk will increase when operators want to expand the business of this ethnic group. Authorities should speed up the opening of data and integrate more non-traditional financial information in the public sector, such as tax records, vehicle registration records, labor and health insurance, fee payment records, etc., through digital data tandem as a reference for credit rating. They should also increase the service target of credit rating agencies, establish a more complete credit rating database, and help more customers get financial services, such as lending and payment.

97

Question

如何透過金融科技的改善，使公益捐款的過程透明化、資訊揭露得更清楚，以提高捐款意願與使用效率？

Perspectives

從技術面來看，傳統公益捐款流程並不透明，難以識別款項是否作為實質公益用途，如何透過金融科技的改善，讓公益捐款過程透明化的理想可能實現？例如透過區塊鏈建立與執行智慧合約，讓每一筆捐款的時間、金額與用途等資訊，都可以被追蹤。捐款人能透過網路直接追蹤金流流向，確認資金是否有被妥善運用，提供給真正需要被救助的對象上，同時也可以確認資金來源，避免有洗錢防制的疑慮出現。

98

Question

目前對於群眾募資平台及行為尚無專屬法律規範進行管理，政府是否應協助群眾募資平台建立一套相關的管理機制？



Perspectives

目前對於群眾募資平台及行為尚無專屬法律規範進行管理，為了避免遭相關主管機關認定是收受存款或吸金行為，而有違反銀行法或證券交易法的問題，故多數仍然以捐贈型與回饋型之群募為主。若有涉及公益相關案件僅能參考公益勸募條例，但內容亦有模糊不明確之處。由於群眾募資案件性質多元，難以決定主管機關，建議政府應進行跨部會的討論，關於智慧財產權、消費者保護、廣告不實、贈與稅等議題，研擬相關的管理機制，將法規灰色空間做出清楚的定義，以確保平台能擁有合法運作的空間。

97

Question

How can the process of public welfare donations be made more transparent and information disclosed more clearly through the improvement of financial technology to increase donation willingness and efficiency?



Perspectives

From a technical point of view, the traditional public welfare donation process is opaque, and it is difficult to identify whether the money is used for substantive public welfare purposes. However, with the development of blockchain technology, the ideal of transparent public welfare donation processes in the future may be realized. Through the establishment and execution of smart contracts and blockchain, information such as the time and amount of each donation and its use can be tracked. Donors can directly track the flow of donation through the Internet to confirm whether the donation is used properly and given to those who really need. At the same time, you can also confirm the source of the funds to avoid doubts about money laundering.

98

Question

At present, there is no exclusive legal regulation on crowdfunding platforms and behaviors. Should the government assist the crowdfunding platforms to establish a set of related management mechanisms?

Perspectives

At present, there are no exclusive laws and regulations governing crowdfunding platforms and behaviors. In order to avoid problems that the relevant regulatory authorities consider to be illegal fund-raising activities and breach of The Banking Act of The Republic of China or Securities and Exchange Act, most of crowdfunding activities are still on the basis of donations and rewards. If there are public welfare related cases, you can only refer to the regulations of Charity Donations Destined For Social Welfare Funds Implementation Regulations, but the content is ambiguous. Due to the diverse nature of crowdfunding cases, it is difficult to determine which regulatory authority to turn to. It is recommended that government departments should conduct cross-ministerial discussions to discuss whether to establish related management mechanisms on intellectual property rights, consumer protection, false advertising, gift tax and other issues and clearly define the legal gray area to ensure that the platform can have a legal operation space.

99

Question

許多微型或新創企業財務或非財務的資訊較為缺乏，是否有更好的方法協助取得金融服務？

Perspectives

台灣是以中小企業為主的就業市場，然而許多微型或新創企業因財務或非財務的資訊較為缺乏，難以向銀行取得金融服務，就算有資料但其正確性及可靠度、公信力不足，造成銀行借貸及企業貿易的不信任。主管機關是否有更好的方法協助微型或新創企業取得金融服務，以健全並提升企業財務面資訊可信度為目標。也應加速訂定相關開放資料政策，提升金融科技業者取得非傳統信用資訊，例如財產所得、水電瓦斯繳費、社群媒體、電信等紀錄，並應用至信用評分系統，讓金融科技業者即時取得有利判斷之加乘資訊，以增加微型或新創企業取得融資的機會。

100

Question

金融科技與法令規範如何協助微小或新創企業解決抵押及擔保品不足的問題？



Perspectives

金融機構在為一般企業提供貸款時普遍採用抵押與擔保方式，然而微型或新創企業不易提出銀行要求的抵押與擔保項目。銀行機構亦因資料不足，不願意承擔信用風險而拒絕其融資需求，導致中小企業取得融資服務較為不易。是否能運用金融科技的技術，發展企業創新融資模式，例如透過物聯網與大數據，發展多元的信用評估模型，分析企業現金流資訊，用以評估借款能力與還款風險，進而降低授信成本與違約風險，提升金融機構提供融資服務的意願。主管機關也可參考其他國家案例，開放如智慧財產或者其他動產項目做為融資擔保之項目，使得微型或新創企業籌資有更多的依據與可能。

99

Question

Many small companies and new startups lack financial or non-financial information. Is there a better way to assist them in obtaining financial services?



Perspectives

Taiwan is a job market dominated by small and medium-sized enterprises. However, many small or start-up companies have difficulty in obtaining financial services from banks due to the lack of financial or non-financial information. Even if the information is accurate and reliable, the credibility is insufficient, creating bank loan and corporate trade mistrust. Does the regulatory authority have a better way to assist small or start-up companies in obtaining financial services, with the goal of improving credibility of financial information for enterprises? It should also speed up the formulation of relevant open data policies to enhance financial institutions to obtain non-traditional credit information, such as property income, gas and water bill payment, social media, telecommunications and other records) and apply it to the credit scoring system, so that FinTech operators can obtain extra information for favorable judgments to increase the chances of financing for small or start-up companies.

100

Question

How can FinTech and legal regulations help small or start-up companies solve the problem of insufficient mortgages and collateral?

Perspectives

Financial institutions generally use mortgages and guarantees to provide loans to general enterprises. However, it is not easy for small or start-up companies to provide mortgages or guarantees required by banks. Banking institutions also refuse to meet their financing needs due to insufficient data and are unwilling to assume credit risk. It is relatively difficult for SMEs to obtain financing services from financial institutions. Perhaps it is possible to use FinTech to develop innovative financing models for enterprises, for example, through the Internet of Things and Big Data, to develop multiple credit evaluation models and analyze corporate cash flow information to assess SMEs' borrowing capacity and repayment risk and reduce the credit cost and default risk of SMEs, and boost the willingness of financing services from financial institutions. Regulatory authorities may also refer to cases in other countries in terms of open data such as intellectual property or other movable property as financing guarantees, so that small companies and startups have more bases and possibilities for financing.

附件

100 問題總表 索引

Appendix Index Table of Top 100 Questions

100 問題總表索引

構面	#	題目敘述	頁數
共同討論議題 Topics of Joint Discussion 	1	金融科技業的主管機關尚未明定，若能明確主管機關，更可加速推動相關配套發展措施以及必要的管理原則。 The regulatory authority of the FinTech industry has not yet been clarified. If it can be clarified, relevant supporting measures and necessary management principles can be promoted more rapidly.	024
	2	政府如何整合官方與民間的力量，透過創新孵化器、加速器等輔導資源，扶植更多元的金融科技創新業者成長？ How can the government support the growth of diverse FinTech innovators through innovation incubators and accelerators?	024
	3	未來民眾可使數位身分證，快速接洽政府部門相關業務與資料。是否也應同時推動全國通行之數位認證機制，統一作業方式和認證工具，並運用至金融科技服務，以減少各家業者各自為政。 In the future, the public can use the government-issued digital ID to quickly access relevant government businesses and information. Perhaps it is also necessary to promote a nationwide digital authentication mechanism, confirm a unified operating method and authentication tools, and apply it to FinTech services, so as to reduce the number of individual companies using their own certificates or authentication methods.	026
	4	台灣的個人資料保護法歷經多次修改與調整，民眾對於自己的權利不甚了解，主管機關如何因應，並進行推廣與教育？ Personal Data Act in Taiwan has been revised and adjusted several times. How can the regulatory authority carry out promotion and education?	026
	5	消費者資料權、開放銀行相關措施管理尚未立法，目前仍由金融業者單向訂定規則，如何確保真正達成促進資料的自由流通，尊重消費者意志？ Consumer data rights and management of open banking related measures have not yet been legislated. At present, financial institutions still dominate and stipulate regulations. How can we ensure that the free flow of data is truly promoted and the will of consumers is respected?	028
	6	面對各式新興科技議題，政府是否可以與民間新創業者建立一個固定的溝通平台或管道，讓雙方共同討論問題與解決方式，讓法制規範與創新發展取得平衡？ Facing emerging technology issues, how does the government establish communication platforms and control service mechanisms for private startups?	028
KYC 身分認證 KYC Identity Authentication 	7	消費者辦理金融服務時，各家業者的身分驗證機制耗時且不統一，是否可由政府統一進行資料整合及驗證的機制推廣？例如全面引用數位身分證，使消費者不必管理過多憑證或密碼，提升便利性。 When consumers handle financial services, the identity verification mechanism of each business operator is time-consuming and not universal. Can the government promote the mechanism of data integration and verification in a unified manner? For example, fully implementing digital ID cards so that consumers do not have to manage too many passwords?	032
	8	現行 KYC 所需相關驗證工具、身分證明文件及檢驗流程，如何在安全與消費者便利之間取得平衡？ How does the relevant verification tools, identity documents, and inspection process required by the current KYC strike a balance between safety and convenience for consumers?	032
	9	政府是否可以強化消費者的個人資料掌握權，藉由透明化的機制可以讓消費者查詢個人資料的流向？ Can the government strengthen the control of consumers' personal data, and allow them to inquire about the flow of personal data through a transparent mechanism?	034

構面	#	題目敘述	頁數
	10	政府單位是否應成立專責的個人資料保護主管機關，進行相關跨部門業務的整合及管理，達到政策的一致性以及減少資源浪費？ Should a government establish a personal data protection authority to integrate and manage related cross-departmental businesses to achieve policy consistency and reduce resource waste?	034
	11	雖然主管機關已有規定，若消費者表明拒絕繼續接到行銷訊息，業者應立即停止，但實際上過度行銷的情況仍常會發生，是否有更完善的做法？ After the financial operator obtains personal data, it often brings in excessive marketing. Can the regulatory authority propose a better approach?	036
	12	基於整體市場風險控管，是否可以開放獲得認證授權的金融科技業者，查詢消費者留存於金融聯合徵信中心的資料以及信用評等紀錄？ Based on overall market risk control, is it possible to open authentication and authorization for FinTech companies to inquire about the information and credit rating records that consumers have left in the Joint Credit Information Center?	036
	13	業者使用的技術不斷推陳出新，對於各種創新技術的發展，主管機關是否能有即時且對應的規範或管理辦法？ Can the competent authority have corresponding regulations or management methods for the development of various innovative technologies?	038
	14	目前的各家金融機構資料庫沒有串聯，政府如何解決民眾變更個人資料時的不便，以及業者資料未能及時更新的空窗期問題？ At present, the databases of various financial institutions are not connected in series. How does the government solve the public's inconvenience when changing their personal data as well as regarding the problem of the period in which the participants' information is not updated in time?	038
	15	對於 KYC 繁瑣的步驟，客戶常會有不耐煩的聲音，業者是否應善盡與客戶的責任，以增加消費者對於 KYC 驗證過程的信任？ Whether service providers should fulfill the responsibility of communicating with customers to increase consumers' trust in the KYC verification process?	040
	16	利用人臉或指紋辨識的身分驗證技術逐漸成熟，但也出現侵犯個人隱私疑慮。目前法規及主管機關是否對於此技術運用定出明確規範？ While face and fingerprint identity verification technology is gradually maturing, there are doubts about Personal Data Protection Act breaches. Do the current regulations and authorities set clear specifications for the use of this technology?	040
	17	KYC 需提供許多審查文件，如何藉由開放相關資料庫，協助消費者減少準備相關資料的程序？ KYC needs to provide a lot of review documents. How can we help consumers reduce the procedures for preparing related materials by opening relevant databases?	042
	18	區塊鏈強調匿名性及去中心化特色的技術運用，與 KYC 的審查精神有所衝突，對於相關產品或服務該如何落實 KYC？ Blockchain emphasizes anonymity and the use of decentralized technology, which conflicts with the spirit of KYC's review. how should KYC policies for block-chain related products or services be implemented?	042
	19	如何讓提供金融服務的相關業者，能夠即時且有效的掌握客戶資料異動的情況，以便有效的控制風險？ How can the relevant providers of financial services be able to immediately and effectively grasp the changes in customer information in order to effectively control risks?	044

構面	#	題目敘述	頁數
支付 Payment 	20	國內電子支付系統眾多，且有跨系統移轉、共通標準整合以及國際接軌等問題，造成消費者選擇與使用上的困難，主管機關如何解決痛點以達到真正普及化？ There are many electronic payment systems in China with problems such as cross-system transfer, integration of common standards, and international integration, which causes difficulties for consumers. How can the regulatory authorities solve these pain points to achieve real popularization?	046
	21	部分國家開始對於數位法定貨幣積極進行試驗及推廣，台灣主管機關未來是否有類似的政策準備，以提早因應？ Some countries are actively promoting digital fiat currency. Will Taiwan have similar policy preparations in the future to respond early?	046
	22	部分消費者願意多承擔一些風險來換取支付便利性，主管機關對於風險控管與支付便利性之間的取捨該如何拿捏？ Some consumers are willing to take more risks in exchange for payment convenience. How should the regulatory authority strike a balance between risk control and payment convenience?	048
	23	隨著跨境匯兌或跨境支付的需求發展，政策的開放與風險控管怎麼做到更好？ With the development of cross-border foreign exchange or cross-border payment, how can opening-up policies and risk control be improved?	048
	24	市面上的支付業者越來越多，如何協助消費者在使用場景當中，以最有效率的方式找到最適合的支付工具？ There are more and more payment providers in markets; how can we find the most suitable payment tool for consumers in the most efficient way?	050
	25	大額支付及小額支付是否有限定金額之標準，針對不同業務內容及使用頻率，主管機關如何進行差異性風險控管？ Is there a standard for large and small payment amounts? How does the regulatory authority conduct differential risk control for different business contexts and frequency of use?	050
	26	行動支付的發展主要在於支付場景的創造，是否應多鼓勵企業或商家提供更多的消費使用場景？對於政策性活動，也應該要有明確的長期規劃。 The development of mobile payment mainly lies in the creation of payment scenarios, should enterprises or merchants be encouraged to provide more consumption usage scenarios? For policy activities, there should also be a clear long-term plan.	052
	27	若遇到無法使用電子支付的民眾或是特殊狀況時（天災、停電、無網路），其支付的需求及權利該是否會受影響？ If consumers cannot use electronic payments or there are special circumstances (natural disasters, power outages, no Internet connection), will their payment needs and rights be affected?	052
	28	除了常見的租稅優惠以及補助政策以外，主管機關是否還有其他的措施，能提升使用行動支付比例？ In addition to the common tax preference and subsidy policies, does the regulatory authority have other measures to boost the proportion of mobile payment?	054
	29	消費者使用電子支付時必須提供許多個人資料，是否可以透過不同的管控措施來限制資料蒐集的範圍及時效性？ Consumers must provide a lot of personal data when using electronic payments. Is it possible to limit the scope and timeliness of data collection through different control measures?	054
資本市場與 財富管理 Capital markets and wealth Management 	30	未來是否會開放更多元的金融商品，以增加機器人理財的投資多元性，吸引更多消費者使用？ Will more financial products be opened in the future to increase the investment diversity of Robo-Advisors and attract more consumers?	058

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	31	現行的理財商品有許多專業條文及限制，相關報表或資訊也較複雜難懂，如何能透過金融科技進行協助簡化，以達普惠金融之目的？ The current financial management products are regulated by professional provisions and restrictions, and the related reports or information are also quite complicated. How can FinTech be used to help simplify these for the purpose of inclusive finance?	058
	32	每個投資人的風險屬性及忍受度不同，未來證券型代幣發行 (STO) 的監理標準，是否可以放寬，鼓勵更多投資人參與？ Each investor has different risk attributes and different tolerance levels. Can the supervision standards of STO be eased in the future to encourage more investors to participate?	060
	33	虛擬貨幣作為新興籌資工具，可能面臨遭竊、詐騙及交易糾紛等問題，主管機關與業者有哪些措施以維護投資人權益？ As an emerging financing tool, virtual currency may face problems such as theft, fraud, and transaction disputes. What measures does the regulatory authority have to protect investors' rights and interests?	060
	34	如何透過法規開放及金融科技的導入，使資本市場的科技應用及整體環境具備國際競爭力？ How can the application of technology in the capital market and the overall environment be internationally competitive through the opening up of regulations and the introduction of FinTech?	062
	35	台灣資本市場偏向硬體產業，是否不利於新創及金融科技業者籌資，也難吸引國外大型業者來台上市？ Taiwan's capital market is biased towards hardware industries and not conducive towards financing FinTech startups and companies. Is it difficult to attract large foreign companies to list in Taiwan?	062
	36	越來越多民眾願意嘗試使用理財機器人的服務，未來若開放自動下單功能，有無任何配套措施能夠保護投資人權益？ More and more people are willing to try the services of Robo-Advisors. If the automatic order placement function is created in the future, will there be any supporting measures to protect the rights and interests of investors?	064
	37	如何有效推廣首次代幣發行 (ICO) 以及證券型代幣發行 (STO)，讓新創業者有更多元的募資管道？ How can we effectively promote the initial token offering (ICO) and the security token offering (STO), so that new entrepreneurs have more diversified funding channels?	064
	38	機器人理財背後演算法所隱含的風險該如何評估，是否有相關指標或數據可以更明確的讓使用者進行比較？ How can we evaluate the risks in the algorithm behind Robo-Advisors? Are there relevant indicators or data that can be more clearly compared by users?	066
	39	對於例如首次交易平台發行 (IEO) 等相關新興籌資方法，政府的開放的政策是否應該更明確，以保護民眾權益與鼓勵業者發展？ For related emerging fundraising methods such as Initial Exchange Offering (IEO), should the government's open policy be clearer to protect the rights and interests of the public and encourage the development of businesses?	066
	40	如何透過 Open API 的資訊分享，將數據的主導權還給消費者，提升證券或財富管理開戶效率？ How can the efficiency of securities or wealth management account opening be improved through Open API information sharing in order to return the leading power of data to consumers?	068

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	42	建議金融及教育的主管機關應將金融商品知識的推廣落實於各階段教育課程，避免產生金融行為偏差及對金融科技信任度不夠之情形。 The promotion of financial commodities knowledge needs to be implemented by the regulatory authority of finance and education in all levels of education courses to avoid deviations in financial behavior and insufficient trust in financial technology.	070
	43	政府能否有更多便利的展示空間供新創業者展示互動，使消費者可以深入了解相關應用技術及熟悉生活使用場域？ Can the government provide a more convenient display space for startups to show and strengthen interaction with consumers so that they can have a deeper understanding of related application technologies?	072
	44	隨著 Open API 的逐步開放，TSP 業者的管理標準是否可依涉入業務風險，訂定不同的分級管理規範？ With the opening of the Open API, can the management standards of TSP operators be adjusted according to the business and the risk involved with it?	072
	45	TSP 業者與金融機構之間的合作模式與責任歸屬如何劃分，是否會影響金融機構發展開放銀行 (Open Banking) 的意願？ How can we divide the cooperation mode and responsibility between TSP operators and financial institutions? Will it affect the willingness of financial institutions to develop Open Banking?	074
	46	Open API 的開放便利性與個人資料法的安全保護要如何權衡，資訊橫跨多平台與業者，主管機關是否有能力或者機制，找出問題根源及後續責任釐清？ How can we strike a balance between the convenience of Open APIs and the security protection of the Personal Data Act? With information across so many platforms and participants, how can the regulatory authority identify the source of the problem and clarify the subsequent responsibility?	074
	47	近期投資虛擬貨幣產品的新聞不斷出現，其涉及洗錢防治、交易實名制及消費者保護等諸多議題，政府單位的相關監管機制為何？ Recent news about investing in virtual currency products is constantly emerging, which involves issues such as money laundering prevention, transaction real-name system, and consumer protection. What is the relevant regulatory mechanism of government units?	076
	48	主管機關如何提升整體民眾之金融知識水準以及金融參與率？ How can the regulatory authority improve the financial literacy level and financial participation rate of the entire population?	076
	49	金融科技的創新發展常超出現有法律之規範，現行法規是否能多以開放鼓勵創新之角度進行制定？ The development of FinTech innovations often exceeds the norms of existing laws. Can the current regulations be formulated with the opening-up perspective of encouraging innovation?	078
	50	主管機關期待純網銀加入刺激現有金融市場，但對於未來可能的監管議題，是否已做好相關配套措施？ The competent authority expects digital full bank to join in stimulating the existing financial market. Have the relevant corresponding measures been taken for possible future regulatory issues?	078

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	52	金融商品的資訊過多且複雜，對於一般消費者來說仍具備較高的知識門檻，如何在符合法規的要求下，又能提供清楚明瞭的資訊給消費者？ There is too much information about financial commodities, and there is a high knowledge threshold for ordinary consumers. How can we provide the clearest and most concise information to consumers without breaching regulations?	082
	53	如何協助消費者在購買金融商品或服務時，能夠更清楚的了解商品內容與運作？ How can we help consumers better understand the content and operation of commodities more clearly when buying financial products or services?	082
	54	客戶體驗優化是金融業者轉型的重點議題，也是影響客戶選擇商品與服務的關鍵點，主管機關是否有相關政策鼓勵業者投入？ Customer experience optimization is a key issue in the transformation of the financial industry transformation. Does the regulatory authority have relevant policies to encourage participants to invest?	084
	55	除了傳統金融業者，是否也應該要求金融科技業者求充分揭露商品契約資訊與風險，以保障消費者安全？ In addition to traditional financial operators, should FinTech companies also be required to fully disclose commodity contract information and risks in order to protect customers' data?	084
	56	隨著新興世代的使用模式以及生活作息轉變，金融業者該如何提供更好的客戶服務？ As the usage patterns and lifestyles of emerging generations change, how can financial operators provide better customer service?	086
	57	消費者在行動裝置上即可完成大多數金融服務，業者與主管機關該如何持續加強行動裝置的安全認證及預防機制？ Consumers can complete most financial services on mobile devices. How can the regulatory authority continue to strengthen the security certification and prevention mechanism of mobile devices?	086
	58	是否能從使用者角度出發，協助設立金融業務及商品資訊的整合平台？ Can we help set up an integrated platform for financial business and commodity information from the perspective of users?	088
	59	建議業者及主管機關對於金融業務流程應持續檢視，在技術及資安許可之下予以優化，以利用戶申請辦理。 It is recommended that the operators and competent authorities should continue to review and optimize the financial business process to facilitate user application processing.	088
	60	金融及新創業者如何透過給予客戶更完善、更全面的售後服務體驗，來維持交易及增加客戶互動往來關係？ How can financial and startups maintain transactions and increase interactive relationships with consumers by providing them with a more comprehensive after-sales service experience?	090
	61	政府是否應該多支持金融科技相關領域的論壇、展覽、技術交流活動，提升民眾對於金融科技的認識？ Should the Government support more forums, exhibitions and technical exchanges in FinTech-related fields to raise public awareness of FinTech?	0990

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	63	金融商品的多樣性時常造成網站平台的資訊量過多，如何讓金融商品的尋找、購買流程更加快速、直覺？ The diversity of financial products often results in an overwhelming amount of information on the website. How can we make the process of finding and buying financial products faster and more intuitive?	092
	64	金融法規的制定應以保護消費者的權益為優先考量，新型態的金融科技與服務，是否也應該明確地納入消費者金融保護的規範？ The formulation of financial laws and regulations should give priority to the protection of consumers' rights. Should new-type financial technologies and services also be explicitly included in the consumer financial protection regulations?	094
	65	金融業者及新創業者如何有效利用社群媒體及數位通路，建立消費者溝通管道？ How do financial operators and startups effectively use social media and digital channels to establish consumer communication channels?	094
	66	隨著金融科技的蓬勃發展，金融服務的提供者與一般產業之間的界線不再如此明確，是否應更加重視跨產業、跨國際的監理發展？ With the complication of laws and regulations and the diversification of technology, is it possible for the government to uniformly establish relevant laws and risk databases?	098
	67	隨著法令的複雜化與科技的多元化，政府是否有統一建置相關法律、風險資料庫的可能？ With the rapid development of financial technology, the boundary between financial service providers and the general industry is no longer so clear. Should we pay more attention to the development of cross-industry and international supervision?	098
	68	主管機關如何運用監管科技發展，達到系統面、資安面、資料保護面的有效管理？ How can the regulatory authority use technology development to achieve effective management of system, security, and data protection?	100
	69	監理沙盒的進入門檻是否能有更細緻的分類分級，給予不同風險的業者不同的授權，以鼓勵更多金融科技業者投入創新？ Can the entry threshold for regulatory sandbox have a more detailed classification through giving different authorization levels to different risk operators in order to encourage more FinTech companies to invest in innovation?	100
	70	金融服務業者、新創業者之風險資料庫，是否可與金融聯合徵信中心互相串接，以充實資料庫之完整性？ Can the risk database of financial service providers and startups can be connected with Joint Credit Information Center to enrich the integrity of the database?	102
	71	法令遵循的監管科技的成本相當高，主管機關是否有相關推廣方案，以提高業者導入應用的意願？ The cost of supervising technology followed by laws and regulations is quite high. Does the government have relevant regulatory technology promotion plans to increase the willingness of participants to introduce applications?	102
	72	目前的監理大多透過事後報表及數據，但這些多屬於落後指標，如何能夠透過實時風險分析來建立早期預警系統？ Most of the current supervision uses post-mortem reports and data, but in fact these are backward indicators. How can an early warning system be established through real-time risk analysis?	104

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	74	是否應將金融科技業者納入金融聯合徵信中心或相關信用資料庫的使用範圍，透過資料開放政策以落實風險評估？ Should FinTech companies be included in the scope of Joint Credit Information Center or related credit database, and the risk assessment implemented through the open data policy?	106
	75	監管科技為了分析與管理，可能接觸大量隱私數據，如何在個人資料保護的前提下，達到合理利用以提升監管的效率？ In order to analyze and manage technology, supervisory technology may be exposed to a large amount of private data. How can it be rationally used to enhance the efficiency of supervision under the premise of personal data protection?	106
	76	對於洗錢防制法令要求的提升，如何協助從事金融服務的金融科技業者，符合洗錢防制規範？ Laws and regulations for the enhancement of the requirements of the money laundering prevention laws and regulations are rising. How can we assist FinTech companies engaged in financial services to comply with the money laundering prevention regulations?	108
	77	對於消費者保險資料與醫療資料的串聯、價值鏈的垂直整合，政府是否有相關協調機制與推廣政策？ Are there any relevant promotion policies for the concatenation of insurance data and medical data, and the vertical integration of value chains to enhance consumer convenience?	110
	78	保險科技與智慧醫療的推廣橫跨多種產業應用，亟需政府單位建立相關的法律配套措施以完善產業發展環境 The promotion of insurance technology and smart healthcare spans a variety of industrial applications, and government agencies are urgently required to establish relevant legal measures to improve the industrial development environment.	110
	79	如何掌握共享經濟之未來趨勢，善用保險科技以有效進入並經營新經濟領域的市場？ How to seize the future trends of the sharing economy and make good use of insurance technology to effectively initiate the market in the new economic field?	112
	80	是否應提升數位平台或數位方式進行投保與服務的範圍，以提高數位化保險的效率與服務品質？ Should the scope of digital platforms or digital insurance service be improved to boost the efficiency and service quality of digital insurance?	112
	81	在保險科技的開放與個人資料保護管理之間，例如生物辨識之應用，如何與時俱進地平衡兼顧？ How can we keep pace with the times and balance the opening of insurance technology and the management of personal data protection?	114
	82	為了提升民眾購買體驗及保險市場發展，如何善用保險科技，解決現有保險商品資訊複雜或是資訊不對等的現況？ In order to improve the purchasing experience of the public and the development of the insurance market, how can we make good use of insurance technology to solve the current situation that the information of existing insurance products is complex or unequal?	114

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	84	隨著保險科技進步及法規的開放，政府及業者如何幫助與教育消費者，了解並接受新的消費思維與行為？ With the advancement of insurance technology and the opening up of regulations, how can the government and participants educate consumers to better understand and accept new consumer thinking and behaviors to optimize the market?	116
	85	保險數位化的目的之一是為了提高客戶保險的體驗數位服務，例如身分驗證，主管機關與業者該如何持續提供優化服務？ One of the purposes of insurance digitalization is to improve customers' successful experience in digital insurance services. How should the government and operators continue to optimize services?	118
	86	隨著外部的環境而快速改變，保險公司應與時俱進，提供多元保險商品的內容與定價方式。 With the rapid changes in the external environment, insurance companies should keep pace with the times and provide diverse content and pricing methods for insurance products.	118
	87	如何善用保險科技，讓數位化投保及後續相關服務過程無縫整合，提升民眾的服務整體滿意？ How to make good use of insurance technology to seamlessly integrate the digital insurance and follow-up related service processes to improve the overall satisfaction of the public?	120
	88	在發展保險科技的同時，如何強化人機協作系統的有效性，補足人工判斷案件風險不足的評估？ While developing insurance technology, how to strengthen the effectiveness of the human-machine collaboration system and complement the assessment of the lack of manual judgment of case risk?	120
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	91	金融聯合徵信的風險評估標準應該一致，其服務對象不應只是金融業者，而是所有提供金融服務的業者都應該同時考慮。 The risk assessment criteria of the Joint Credit Information Center should be consistent, and the service target should not only be the financial industry, but all financial services providers.	126
	92	部分傳統的金融服務有一定條件限制，政府如何協助創新金融科技服務改善現有的信用管理以及環境條件？ Some traditional financial services have certain restrictions. How can the government assist innovative financial technology services to improve existing credit management and environmental conditions?	126
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	94	關於偏鄉地區與原住民族群，政府單位如何協助取得良好的金融服務及產品資訊，以達普惠金融之目的？ Regarding groups in rural areas and indigenous ethnic groups, how can government units assist in obtaining good financial services and product information for the purpose of inclusive finance?	128
	95	金融科技的發展或設計多以年輕人為出發，政府是否也應注重年長者及身心障礙族群的權益？ The development or design of fintech is mostly based on young people. How can the government pay better attention to the rights of the elderly and people with disabilities?	130
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	98	目前對於群眾募資平台及行為尚無專屬法律規範進行管理，政府是否應協助群眾募資平台建立一套相關的管理機制？ At present, there is no exclusive legal regulation on crowdfunding platforms and behaviors. Should the government assist the crowdfunding platforms to establish a set of related management mechanisms?	132
	99	許多微型或新創企業財務或非財務的資訊較為缺乏，是否有更好的方法協助取得金融服務？ Many small companies and new startups lack financial or non-financial information. Is there a better way to assist them in obtaining financial services?	134
	100	金融科技與法令規範如何協助微小或新創企業解決抵押及擔保品不足的問題？ How can FinTech and legal regulations help small or start-up companies solve the problem of insufficient mortgages and collateral?	134



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