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Exploring Open Insurance for Aotearoa New Zealand

April 2026

Contents

The strategic case for early engagement on Open Insurance

Although designation under the Consumer Data and Product Act 2025 is not guaranteed, New Zealand's insurance ecosystem is at a strategic inflection point with the role of data across the industry: whether to proactively shape Open Insurance for Aotearoa, or wait and risk external parties defining the future data-sharing landscape.

New Zealand's insurance sector is under growing pressure. Climate volatility, rising reinsurance costs, underinsurance and affordability challenges, increased regulatory scrutiny and uneven technology maturity are intensifying just as customers expect faster, digital and connected experiences.[1] At the same time, the financial services landscape is being reshaped by Open Data through the Customer and Product Data Act 2025 (CPD). The CPD enables customers to direct data holder organisations to securely share their data with accredited third parties via standardised application programming interfaces (APIs).[2] In insurance, this is known as Open Insurance.[3] At its core, the CPD creates a data-sharing coordination layer that shifts data from a firm-controlled asset to a shared enabler of innovation, efficiency and better customer outcomes across the system.[4]

While banking and electricity have been designated under the CPD by the Ministry for Business, Innovation and Employment (MBIE), insurance is yet to be included.[5] Internationally, jurisdictions such as Brazil, Singapore and the United Kingdom have expanded, or are expanding, Open Banking regimes to include insurance as part of a broader shift towards Open Finance and Smart Data Economies.[6] While designation for New Zealand insurance is not guaranteed, global experience suggests it is plausible over time as Open Data regimes mature and New Zealand looks to expand Open Banking to Open Finance to make financial services and insurance more connected, innovative and customer-led.[7]

This raises a critical strategic choice for insurers: engage early to shape Open Insurance in a way that delivers value locally for all ecosystem members or wait until formal designation and risk the model being disintermediated in the meantime by third party aggregators with established Open Data capabilities. Early engagement would help insurers retain customer interfaces, value and influence over how Open Insurance is designed as New Zealand looks to move towards an Open Finance ecosystem. Experience from Brazil, Singapore and New Zealand's own Open Banking journey shows that coordinated, early industry engagement, supported by a strong centre of gravity to lead the roll out and shape standards, consent models and governance arrangements with regulators, enabled Open Data to scale effectively and deliver outcomes across the value chain.[8] Conversely, fragmentation and a compliance-driven approach have often resulted in limited compelling use cases, implementation complexity and slower adoption, as seen in Australia.

Open Insurance creates value across the insurance ecosystem when designed well. The Use Cases section outlines the impact Open Data made for the different members of the insurance ecosystem in various jurisdictions.

- **For customers**, it improves transparency, trust, and control over their data, enables a more holistic view of their financial wellbeing, reduces friction across claims, onboarding and servicing, and supports better advice and protection outcomes.
- **For insurers**, it reduces operational waste, informs product design, enriches customer insights and advice, accelerates technology modernisation, and enables participation in new distribution models and ecosystems while retaining relevance.
- **For intermediaries and brokers**, it enables lower-friction onboarding, more nuanced customer insights, improved advice quality, and more efficient servicing across the policy lifecycle.
- **For ecosystem partners and innovators**, it creates a secure foundation for new products, partnerships, embedded insurance propositions, and customer-centric services.
- **For regulators and policymakers**, it supports improved market transparency, competition, consumer outcomes, and data stewardship, while reducing system risk through clear standards and governance.

This paper explores the value Open Insurance could unlock for Aotearoa New Zealand through practical use cases, examines the key strategic choices insurers would need to navigate, draws on lessons from international experience, and highlights the key risks the ecosystem would need to manage to enable Open Insurance.

Use cases: What Open Insurance looks like in practice

The value of Open Insurance is realised through practical applications across the insurance value chain, especially the moments that matter for customers like onboarding and claims processing.

Across onboarding, servicing, and claims, Open Insurance would enable consented reuse of existing customer data, reducing repetition, manual effort, and delays. This could materially improve customer experience while lowering operational cost and error at scale. By enabling access to richer, consented data across financial, asset, and life-event contexts, Open Insurance would support more accurate underwriting, earlier identification of protection gaps, and better pricing decisions. This is critical as converging challenges cause risk pools to deteriorate and affordability pressures to rise.

Open Insurance makes embedded and point-of-need insurance viable by allowing insurers to plug into broader digital distribution channels beyond their traditional methods. This would shift insurance from a periodic, transactional interaction to more continuous, contextual engagement with customers.

	Product design & distribution	Underwriting	Onboarding	Claims management	Ongoing customer servicing
Description	Open Insurance could enable insurers to design more personalised products based on shared customer data (with consent) and distribute them through modern digital channels, such as Bolttech and Guru, opening new ways to reach customers.[9] Customers could access insurance more easily through apps, marketplaces and embedded experiences, with cover that adapts as their lives change. In Brazil, AXA uses APIs to compete on digital marketplaces, while Certua Life uses customers' financial data shared by APIs with fintechs in the UK to deliver personalised, embedded life insurance through digital channels.[10]	When sharing data via Open Insurance to onboard customers onto a new product, insurers could gain a more nuanced view of the prospective customer to build a more accurate client risk profile. These insights could be translated into sharper pricing and coverage, with the potential to evolve into dynamic or near-real-time pricing when paired with AI-driven analytics. This could further enrich the datasets already used by underwriters as part of their intellectual property.	With customer consent, insurers and brokers could access consented customer data to speed up quotes and pre-fill applications, reducing onboarding time and improving advice. This data could also support AI assistants that explain policies in plain language, helping customers to make informed choices and insurers to meet regulatory requirements, such as those under the Contracts of Insurance Act 2024. Overseas, Australian mortgage brokers save about 40 minutes of onboarding time per customer using Open Banking integrations with their CRM systems.[11]	Integrating data from all claim participants could create a centralised view of the claims process, enabling more automation, greater operational efficiency and a better experience for everyone. AXA Brazil uses APIs to handle roadside assistance, coordinating actions like dispatching help and providing ride vouchers to claimants, while keeping all parties informed throughout for a seamless claims process.[12] In the UK, Crawford and CRIF use APIs to validate business insurance claims, allowing faster verification and payout calculations, aiming to cut manual processing by 30% and reduce paperwork for customers.[13]	Open Insurance could help address New Zealand's underinsurance challenge by giving customers a more complete view of their financial and insurance position, enabling them to adjust coverage over time and avoid gaps in protection. In Singapore, insurers have integrated their apps with SGFinDex, the national Open Finance platform that combines financial, insurance and government data via APIs.[14] This helps customers and advisers identify coverage gaps and improve advice.[15] Great Eastern saw a sevenfold increase in SGFinDex sign-ups after integrating their app with the platform, highlighting the value of a centralised customer view in ongoing insurance management.[16]
Who benefits?					

Key ecosystem value chain members:

Customers · Insurers · Insurtechs · Brokers / Advisers / Intermediaries · Claims service providers

Strategic tensions: Open Insurance requires trade-offs to set it up for success

Although Open Insurance is facilitated by technology, taking a technology-led approach to its design and implementation would not set it up for long-term success. Instead, Open Insurance prompts making trade-offs and deliberate, interconnected choices about broader strategic tensions that will influence the future role insurers play in the data sharing market. Pages 5-7 are a resource to support boards and executive teams to work through the key strategic trade-offs at the enterprise and system levels to shape insurers' roles for and the design of Open Insurance in Aotearoa New Zealand before these options are constrained through actions by other players, such as Open Data aggregators.

These choices include proactive leadership versus reactive following, foundations-first versus value-now, partnering versus protectionism, and commercialisation versus compliance.

Not making any choices is itself a choice, but one that favours intermediaries, fragmentation and potential disruption from offshore Open Data aggregators.

Relevance	Strategic tensions	
Influences whether the insurer shapes the future model or adapts under pressure when regulation arrives.	**Proactive leadership** Enables early movers to influence standards, test solutions, and build capability ahead of formal regulation.	**Reactive following** Waits for mandated rules, reducing short-term risk and preserving resources, but limits strategic influence and increases the likelihood of compressed compliance timelines once regulation is enforced.
Sets the speed at which value is realised by customers and intermediaries – determining engagement and uptake.	**Foundations-first** Prioritises digital identity, API platforms, data standards, and core system uplift to ensure scalability and consistency. This reduces long-term rework but delays visible benefits.	**Value-now approach** Accelerates momentum by delivering early, tangible use cases, such as faster claims decisions or broker efficiencies, but without strong foundations that may create fragmented solutions or erode trust if early services underperform.
Determines whether the insurer shapes emerging value chains or risks being displaced by more open, collaborative competitors.	**Partnering** Leverages Open Insurance to collaborate with brokers, reinsurers, insurtechs, providers, and digital platforms, enabling embedded insurance, richer data-driven services, and new customer experiences.	**Protectionism** Minimises data sharing and focuses narrowly on compliance, but risks limiting ecosystem growth and allowing more experienced international players to capture emerging market opportunities.
Shapes investment levels, innovation appetite, and speed to market – determining competitiveness.	**Commercialisation** Positions data sharing as a catalyst for new propositions, operational efficiencies, and value-added services beyond the minimum CPD requirements.	**Compliance focused** Ensures legal adherence and consumer empowerment but risks under-investment, slower progress, and limited innovation across the industry.

Timing matters: Proactive leadership influences the delivery of short- and long-term value

Experience from Brazil and Singapore shows that Open Insurance works best when industries engage early and collectively. Working together and with regulators, insurers could shape standards, governance and priority use cases in ways that work commercially, operationally and for customers, enabling trust, scalability and locally-relevant outcomes. Proactive engagement would allow the New Zealand insurance ecosystem to influence how Open Insurance is designed and implemented across the value chain, supporting better outcomes for customers, insurers and ecosystem partners.

Focusing solely on foundations would delay the realisation of value, while only focusing on delivering value now would risk gaps being present in the key enablers for Open Insurance. Insurers could navigate these tensions through aligning on high-value use cases across the industry, and incrementally build the foundational components for Open Insurance for each use case, supported by a pilot-led approach where appropriate. This would eventually provide the industry with the full foundational stack over time while enabling near-term benefits.

Proactive leadership

Enables early movers to influence standards, test solutions, and build capability ahead of formal regulation.

Reactive following

Waits for mandated rules, reducing short-term risk and preserving resources, but limits strategic influence and increases the likelihood of compressed compliance timelines once regulation is enforced.

Foundations-first

Prioritises digital identity, API platforms, data standards, and core system uplift to ensure scalability and consistency. This reduces long-term rework but delays visible benefits.

Value-now approach

Accelerates momentum by delivering early, tangible use cases, such as faster claims decisions or broker efficiencies, but without strong foundations that may create fragmented solutions or erode trust if early services underperform.

International experience shows Open Insurance succeeds when industries engage early and coordinate around a strong centre of gravity for governance and implementation. In Brazil, insurers worked closely with regulators through a central governing body to shape standards, consent, and governance, enabling scale while maintaining trust.[17] By contrast, Australia legislated early but lacked alignment on use cases and took a prescriptive approach to design, resulting in higher complexity, compliance costs and slower uptake.[18] While Singapore took a market-led approach, regulators partnered with industry to shape Open Insurance, develop key infrastructure to enable it and guide its implementation.[19] Early and collective engagement with a strong centre of gravity to lead it at the industry level would allow New Zealand's insurance ecosystem to shape Open Insurance in a way that works locally across scope, standards, governance, security, use cases, and customer experience.

New Zealand's Open Banking experience shows that early industry–regulator collaboration for security standards reduced friction and delivered stronger outcomes after designation under the CPD.[20] If engagement on Open Insurance is delayed or fragmented, offshore intermediaries and platforms could define data sharing standards, control customer data flows, and own customer relationships, leaving local insurers with reduced influence over how data is used and how value is distributed across the ecosystem, potentially rendering insurers as balance sheet utilities rather than shapers of the customer experience.

A value-now approach would start by the insurance ecosystem aligning on a small number of priority use cases that deliver clear customer, business and system-level value. The foundational components for Open Insurance would be built as each use case is delivered, allowing value to be realised in the near term while capabilities continue to mature over time as the full foundational stack is created. The ecosystem could leverage existing Open Data components, such as API standards, security, customer experience and governance frameworks, sandboxes and registers developed for New Zealand's Open Banking regime, and adapt them to insurance as use cases are implemented.[21] Taking a use case-led approach would support incremental delivery, testing and learning, including through pilots, and gradual modernisation of legacy systems and data platforms, while maintaining control, trust and long-term optionality. It would also enable the ecosystem to pursue alternative innovation pathways, including partnerships, shared services and collaboration with insurtechs.[22] Brazil has demonstrated the effectiveness of a phased delivery approach, providing Open Insurance with a mechanism to build momentum, adoption and scale over time.

Partnering and commercialisation: Key design choices for innovation and longevity

Globally, insurers are using Open Insurance to partner more actively with brokers, insurtechs and digital platforms to reach customers in new ways, embed insurance into everyday customer journeys, and improve efficiency. A protectionist or compliance-only stance may feel safer in the short term, but it could limit innovation and risk agile offshore players with established Open Data experience capturing customer relationships instead. A Partnership-led approach would be recommended to enable new distribution models, modernised customer experiences, and innovative products and services enriched by data, while supporting continued participation in an increasingly connected digital ecosystem.

Implementing Open Insurance would require real investment. Australia's largely compliance-led and prescriptive approach has resulted in high costs and limited innovation. By contrast, ecosystems that allow for commercialisation, for example through tiered or premium services beyond core obligations, could create a path to financial sustainability and reinvestment. Taking a commercial approach to Open Insurance would support a model that funds capability uplift while protecting performance, rather than imposing it as an ongoing compliance cost.

Partnering ↔ **Protectionism**

Partnering	Protectionism
Leverages Open Insurance to collaborate with brokers, reinsurers, insurtechs, providers, and digital platforms, enabling embedded insurance, richer data-driven services, and new customer experiences.	Minimises data sharing and focuses narrowly on compliance, but risks limiting ecosystem growth and allowing more experienced international players to capture emerging market opportunities.

Open Insurance facilitates more active partnerships across the insurance ecosystem, seen globally between brokers, intermediaries, insurtechs and digital platforms. These partnerships would enable embedded insurance, innovative and personalised products and services, improved customer journeys and operational efficiency.[23] By contrast, a protectionist, compliance-only stance would risk limiting domestic innovation and allowing offshore players already experienced in Open Data to capture customer relationships through controlling the flow of data, potentially displacing incumbent insurers from the market and leading to poor insurance outcomes for New Zealanders.

In the UK, insurers that partnered with fintechs and digital platforms benefited from data shared by Open Banking APIs to increase the efficiency and effectiveness of identifying and onboarding prospective customers, providing personalised products, processing claims and improving customer experiences.[24] Closer to home, the Bank of New Zealand partnered with BlinkPay to develop New Zealand's first real-time payments capability using Open Banking technology.[25] Such partnerships follow the shift globally towards 'open innovation' in insurance, with insurers partnering across the ecosystem with start-ups, venture capital organisations and venture studios to scale innovation and deliver impact faster.[26]

Commercialisation ↔ **Compliance focused**

Commercialisation	Compliance focused
Positions data sharing as a catalyst for new propositions, operational efficiencies, and value-added services beyond the minimum CPD requirements.	Ensures legal adherence and consumer empowerment but risks under-investment, slower progress, and limited innovation across the industry.

While Open Insurance presents opportunities for innovation, it would require significant investment to implement, making long-term financial sustainability critical. New Zealand's CPD limits fees for accessing datasets mandated by regulations.[27] However, opportunities could exist to design tiered service models that offer value-added, higher-performance services beyond core obligations. This would support commercial returns from Open Insurance and make it commercially sustainable while protecting trust. The UK's Future Entity for UK Open Banking will be responsible for enabling premium APIs, which provide new products and services beyond those which are included in regulatory requirements.[28]

Conversely, being regulator-led with limited or late industry engagement could create a compliance-focused regime with limited commercial appeal, as seen with Australia's complex and prescriptive Consumer Data Right design, which has had high compliance costs and implementation complexity, especially for mid-tier banks.[29] For insurers, shifting from a narrow compliance mindset to a thoughtful commercialisation strategy would help fund ongoing capability uplift, the implementation of Open Insurance and unlock broader customer and ecosystem value over time by having funds to keep reinvesting into Open Insurance as the model evolves.

International case studies: Lessons for New Zealand's Open Insurance trajectory

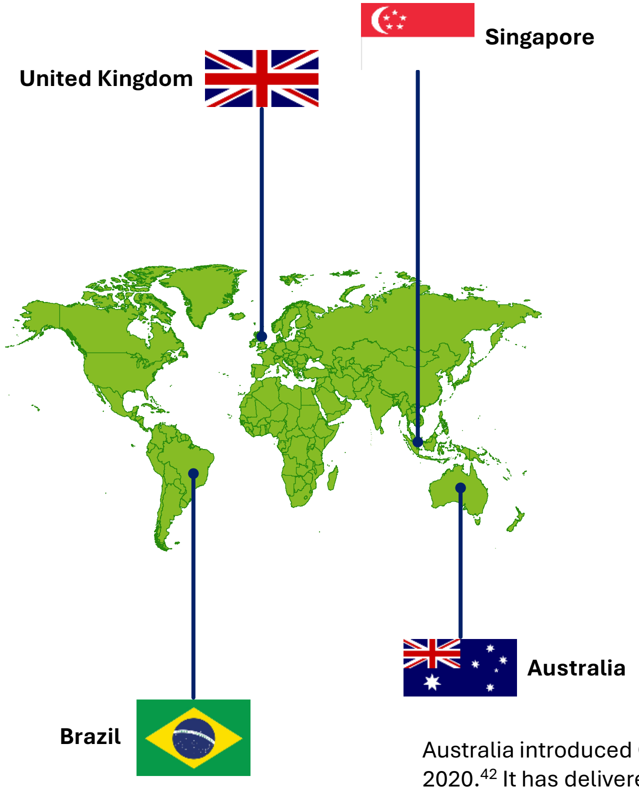
What we see internationally is not a single blueprint to enable Open Insurance, but clear patterns. Jurisdictions like Brazil and Singapore show that when Open Insurance is introduced as part of a broader Open Finance vision with strong central governance, coordinated engagement, and clear value for customers, adoption scales. Insurers remain active participants in customer journeys, rather than being pushed to the edge.

The UK shows both the upside and the limits of regulation-led approaches. Open Banking has delivered real consumer benefits and scale, but fragmented regulatory governance has slowed progress.

Australia's experience illustrates how a highly prescriptive, compliance-heavy approach without early alignment on key Open Banking use cases can increase cost and complexity, and dampen industry momentum.

The core lesson for New Zealand is that designation under Open Data regulations alone does not create value. Outcomes are shaped by early industry engagement, coherent governance, and designing a workable, trusted and commercially sustainable model.

The UK's Open Banking, launched in 2018, had 17 million users as of January 2026, up from 7.7 million in August 2023, and supports digital payments, account aggregation and money management applications for budgeting and saving, for example.[30] It has improved consumer choice and business cash flow, created new products and services, and enabled new revenue streams for banks.[31] However, progress has been constrained by fragmented regulatory governance, commercial misalignment and uneven customer awareness.[32] Despite this, the UK Government's Smart Data Strategy 2035 builds on the 2024 Smart Data Roadmap to expand Open Banking to Open Finance, including insurance, to create a trusted, interoperable system of consent-based data sharing that empowers customers, enables innovation and drives long-term economic growth.[33] The Financial Conduct Authority is expected to publish their Roadmap for Open Finance later in 2026 to support this ambition.[34] The UK shows that regulation can drive scale, but lasting value in Open Insurance requires clear, customer-led use cases, coherent governance and commercial alignment, not regulation alone.



Singapore's SGFinDex platform securely combines banking, insurance, investment, and government data using the country's national digital identity, providing customers with a holistic view of their finances and expanding the country's Open Finance journey that began in 2020.[38] By 2025, the platform had over 150,000 users, and helps advisers and insurers spot insurance protection gaps and give better advice.[39] With a market-led approach to Open Finance, adoption is driven by trusted public infrastructure, and strong industry-regulator collaborative leadership, not just mandates.[40] Insurers stay involved in customer journeys, with consumers controlling their data. This supports the goals of Singapore's Smart Nation programme to transform the country into a digitally-enabled nation.[41] For New Zealand, Singapore's experience highlights that the value of Open Insurance is delivered with trusted digital systems, public-private teamwork, and clear benefits for users.

Brazil launched Open Insurance in 2021 as part of its broader Open Finance programme, using a phased approach with an industry centre of gravity.[35] Insurers worked closely with the regulator and the Superintendence of Private Insurance (SUSEP) to set standards, consent models and governance, with SUSEP leading the rollout.[36] Over 16.5 million Open Insurance API transactions occurred between 2023 and 2024, indicating strong adoption.[37] Brazil demonstrates that early industry involvement, mandatory rules for participants, and central governance can enable scale and confidence.

Australia introduced Open Banking under the Consumer Data Right in 2020.[42] It has delivered measurable benefits, including improved customer financial outcomes (e.g., account increases of AUD$330 per month by using Open Banking-enabled budgeting apps) and faster customer onboarding for mortgage brokers through CRM-Open Banking integrations.[43] However, a highly prescriptive, compliance-heavy design, needing to engage with multiple regulators, data quality issues, and a limited early focus on compelling use cases constrained adoption and innovation, and created implementation challenges.[44] Regulatory penalties for CDR breaches highlighted the operational challenges of participation.[45] Australia's experience shows that complex regulation and a lack of strong use cases risks high costs and limited delivery of value.

Risks of Open Insurance: Early coordination is key

Open Insurance fundamentally changes how data flows across the insurance ecosystem, introducing new forms of risk. These risks are not reasons to delay. Instead, they are reasons for the ecosystem to engage early and collectively. Addressing risks through shared standards, governance and accreditation would be more effective than leaving individual firms to manage exposure in isolation.

Insurers' proprietary data and underwriting insights are core competitive assets, and without clear boundaries around data scope and derived data, differentiation could be eroded. Implementation could also bring material cost and complexity, particularly for insurers operating on legacy platforms.

Open Insurance could heighten cyber, liability, and data integrity risks. As more parties access data, responsibilities for consent, security, accuracy, and remediation must be clearly defined to avoid disproportionate reputational and regulatory impact. Finally, poor data quality, unclear consent, and low customer understanding could quickly undermine trust and lead to poor outcomes, particularly for vulnerable customers.

Loss of intellectual property

Insurers' proprietary underwriting data and models represent core competitive assets. Without clear boundaries, particularly around derived data, Open Insurance could erode this competitive differentiation.[46] Engaging early on Open Insurance could enable insurers to negotiate and set the scope of the datasets for Open Insurance to help protect this data.

Implementation complexity

Collecting, standardising, and integrating data across legacy systems can be costly and challenging. Early phases tend to involve significant effort and investment before benefits emerge, as seen in Australia.[47] Insurers, particularly those still running on legacy systems, would need to allow for sufficient investment into establishing strong, modern technology and operational foundations to engage with Open Insurance.[48] Technology and data modernisation are thus a no-regrets decision for insurers as the ecosystem becomes increasingly open, digital and AI- and data-driven.

Cyber security and liability

More participants accessing data across the insurance value chain could increase potential exposure to cybersecurity and privacy breaches, with Brazil experiencing cybersecurity incidents in its Open Finance ecosystem in 2025.[49] To mitigate these risks, clear and consistent cyber security and liability standards would need to be developed and implemented, alongside a strong accreditation framework for third parties. New Zealand's Open Banking Standards Users community engaged early with MBIE to develop security standards, demonstrating that highly-effective industry-wide collaboration helped to deliver stronger regulatory outcomes.[50]

Data integrity and misuse

Poor data quality and errors could propagate across multiple recipients after a request to send data from an insurer to an Insurtech has been fulfilled, for example. Data quality issues have affected the implementation of Australia's CDR, affecting customer outcomes in the use of Open Banking.[51] This could have the potential to create poor customer outcomes and infringe on insurers' obligations under the Conduct of Financial Institution (CoFI) regulations, as well as privacy and other government legislation, data governance, accreditation and security standards.[52] Without strong source-of-truth rules, data governance standards and processes, and correction obligations, issues could escalate across the data chain.[53] As seen with New Zealand's Open Banking journey, engaging with regulators and across the industry early was effective for reducing friction across the ecosystem and designing a workable governance and security framework to mitigate these risks.[54]

Vulnerable customers

Vulnerable customers or those with low digital literacy may not fully understand consent parameters or be able to fully participate in an Open Insurance digital ecosystem.[55] Clear, revocable consent frameworks with strong governance and customer experience guardrails would be essential to protect these customers. All parties across the insurance ecosystem must also be aware of the risks of a 'race to the bottom' that Open Insurance aggregator and marketplace platforms could create as customers look for more competitive prices.[56] Insurers may need to compete on alternative income streams, such as differentiated products and services, rather than solely relying on price in this environment to ensure good customer outcomes are achieved (e.g., having a product customers can afford that provides the required coverage, and customers understanding their insurance policies) as required under CoFI and the Contracts of Insurance Act 2024.

The choice ahead for insurers

New Zealand's insurance industry has approached an inflection point. The pressures facing the sector, including environmental volatility, affordability challenges, the rising cost of claims and reinsurance, regulatory scrutiny and uneven technology maturity, will likely intensify. Globally, Open Insurance has emerged as a structural shift that redefines data access, customer control and competitive dynamics.

The central choice for Aotearoa New Zealand's insurers is whether to engage early to shape Open Insurance in a way that delivers value locally for all ecosystem members, or wait until formal designation and risk the model being disintermediated in the meantime by third party aggregators with established Open Data capabilities, potentially producing less favourable outcomes for New Zealand's insurance ecosystem. Early engagement would preserve influence over standards, governance, scope, commercial models, and customer outcomes and experience. It would also accelerate technology modernisation and position insurers to operate effectively within increasingly integrated digital ecosystems. Waiting, by contrast, could increase fragmentation and create opportunities for offshore aggregators or non-sector-players to define how customers' insurance data is accessed, shared and used at the system level across Aotearoa New Zealand.

The call to action is clear: insurers should engage now, with each other, regulators and wider ecosystem members, through a partnership approach to align on priority use cases, establish shared foundations through prioritised use cases and pilots, and design a commercially sustainable Open Insurance model that works for Aotearoa New Zealand, with the appropriate governance, standards and customer experience frameworks, to deliver value in the near- and long-term. Not choosing is itself a choice, and one that risks leaving the future of insurance data sharing to others.

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