

Brokers

QUESTION 6: Do you agree with the Government's understanding of data broking as set out in Part 1 and that the term 'data broker' is best used to describe organisations that conduct this type of activity? If you disagree, what term(s) would you use to describe organisations that conduct data broking activities?

There should be an umbrella term for data brokers, data intermediaries, data trusts – it matters little what that term is (lower case "t" trusts has the biggest downside as they aren't necessarily Trusts). But they are all on a spectrum from temporarily legitimate to sustainable criminality.

QUESTION 8: What social and economic impact do you consider the data broker market to have in the UK? Please consider both positive and negative effects.

The most attractive organisations will be those that make the most profit, which is usually at the expense of vulnerable citizens

QUESTION 10: (if answered aware) Please describe your understanding of how hostile exploitation of UK data can harm the UK's national security?

It is the position of the health data ecosystem that we should let shell companies about which we know nothing buy the data. (see chapters 6+8+conclusion of the recent book "year of the rat" by Harry Shukman for who is buying UK health data, a position that those selling it continue to believe is absolutely fine.

QUESTION 12: (if answered concerned) What are the most concerning threats you or your organisation is observing from access to UK data on the open market and how do you see these evolving?

Institutions want the money they get from selling the data more than they care about the consequences of selling the data.

The NHS will argue that they don't sell the data, they just charge for the paperwork, and if this was a real consultation response the previous paragraph would have included a link to their online price list with discretionary pricing for different activities that don't have consequences for paperwork.

QUESTION 13: Do you consider current legislation and regulations to sufficiently protect UK data from misuse? Please explain the reasoning for your answer.

Enforcing it would be a start.

QUESTION 40: How much trust do you have in organisations conducting data broking for marketing, research or other purposes? Would this trust differ if you had more transparency about how your data is used?

Little.

QUESTION 41: How can organisations who conduct data broking improve transparency or awareness of their operations to instil confidence in consumers about data security?

This question is hopelessly naive. Legitimate organisations will be honest about their activities, the organisations of most concern simply lie or omit the details that would affect such confidence. We'd paste examples in here but given how you structure this consultation you give no suggestion that you want to hear about them.