### 7. What are the respondents’ views on the requirements for collection of information and documentation for the purposes of creditworthiness assessment (Section 5.1)?

The Swedish Consumer Agency's opinion is that it is important to collect as much information from the consumer, as the primary source, as possible and thereafter verify it using public sources, such as institutions’ governance, credit risk policies and procedures etc.

In p. 83. it is stated that lenders must collect information and verify it at a sufficient level. The Swedish Consumer Agency considers that the p.83 should be clarified to include guidelines on where the information must be collected.

The Swedish Consumer Agency's opinion is that the information should be primarily collected from the consumer and then be verified with the help of information from public sources, employers, and credit information companies as stated in p. 87.

In p. 91. it is specified in more detail what information should be collected and these are further specified in Appendix 2. The Swedish Consumer Agency considers that the lender also needs to collect information about the consumer's monthly expenses or living expenses such as, cost of living, food, electricity, and childcare to be able to carry out a full credit check and calculation of the borrower's repayment capacity.

### 8. What are the respondents’ views on the requirements for assessment of borrower’s creditworthiness (Section 5.2)?

The Swedish Consumer Agency considers that the proposed guidelines “on loan origination and monitoring” are an important document. However, the Swedish Consumer Agency considers that creditors may find it difficult to comply with p.118. It is clear from the paragraph that the creditor should take into account factors that may affect the consumer's ability to fulfill his obligations without causing unnecessary difficulties and overwhelming debt. Among other things, these should include costs of living.

In p. 91 and annex 2, it is clear what information the creditors should be collecting to carry out a credit check. As mentioned earlier, living expenses or the consumer's monthly expenses are never mentioned. Therefore, the Consumer Agency considers that in p. 91 and annex 2, additional points should be included regarding the gathering of living costs or monthly expenses from the consumer.

Regarding p.99 referring to the credit rating assessment, the Consumer Agency considers that further calculation options may be suitable to use, such as “Left to live on” or spendable income (Income-monthly expenses-monthly debt payments).

The calculations method “left to live on” is one of the models used by Swedish lenders when evaluating the borrower's repayment ability.