



REPORT

Consumer Protection Report 2024

8 May 2024



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This report fulfils Finansinspektionen's assignment to report to the Swedish Government on the authority's consumer protection work pursuant to section 17, point 4 of FI's Instructions.¹

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¹ Finansinspektionen's Instructions Ordinance (2023:910)

Foreword

According to Finansinspektionen's assignment from the Government, we must report annually on our work with consumer protection in the financial sector. This report fulfils this obligation. In this report, we highlight four risks to consumers that we are prioritising in 2024. We also describe the measures we implemented in 2023 and the measures we are planning to implement in 2024 to strengthen consumer protection. In addition, we describe the need for new rules to strengthen consumer protection.

Stockholm 7 May 2024

Daniel Barr

Director General

Summary

FI's consumer protection work in 2024 will focus in particular on four risks: financial exclusion, fraud, unsuitable savings and investment products, as well as unsound lending practices.

The Swedish economy has been experiencing high inflation in recent years. 2022 marked the end of the years of low interest rates to which many consumers had become accustomed. Mortgage borrowers today need to use a significantly larger share of their income than before for interest and amortisation payments.² The state of the economy is also reflected in the increase in the number of consumers experiencing debt-related problems. In some cases, this can be related to consumers being granted loans they cannot afford. In 2024, we therefore have a special focus on reviewing the credit checks of consumer credit companies.

We see that consumers who have their payment account closed or are denied opening an account end up in financial exclusion. Therefore, we take the position that there should be a law enacted, which requires banks to assess in every individual case whether it is possible to take measures to counteract money laundering and terrorism other than denying access to a payment account.

Consumers need stronger protection when receiving financial advice. We see that advisors are sometimes rewarded with high commissions when they sell products that can be both expensive and unsuitable, which leads to conflicts of interest. We therefore would like to see a government inquiry that in part drafts proposed measures to counteract conflicts of interest on the savings market.

FI sees how fraudsters are using financial services. For example, they pretend that they work for a bank and thus convince consumers to transfer money. They also trick consumers into investing in a fraudulent scheme. FI is working preventively to issue warnings about both Swedish and foreign companies that do not have authorisation. We also offer consumers tips via our website and in social media on how they can avoid being tricked. During the spring, we are reviewing how payment service providers' products and services are used for fraud and how payment service providers are working to prevent this.

² New mortgagors in 2023, after interest rate deductions, used on average 18 per cent of their disposable income for interest and amortisation payments. This represented an increase of approximately seven percentage points compared to the period 2017–2021. Source: *The Swedish Mortgage Market 2023*.

Prioritised risks in 2024

FI highlights here the risks we will prioritise in particular during the year. We also present activities related to these risks that we plan to implement during the year. It should be noted that this section does not give a comprehensive overview of FI's consumer protection work, which also includes other activities.

Financial exclusion

When consumers are denied a payment account, or have their payment account closed, they experience financial exclusion. Therefore, we believe that banks should be able to do more to ensure that consumers have access to a payment account.

Many consumers are not financially literate at a basic level; for example, they do not understand words such as *interest rate* and *inflation*. This can make it difficult for them to make well-founded decisions about their personal finances.

Access to a payment account

Access to a payment account is very important for day-to-day life. Without a payment account, it is difficult to be paid a salary, pay bills, and pay with a credit card. Because many stores today do not take cash, consumers who do not have a payment account are prevented from making purchases. A payment account is also often a prerequisite for the consumer to gain access to electronic ID, which facilitates interactions with authorities and healthcare.

FI finds it worth noting that the number of consumers who had their payment accounts closed increased by 30 per cent between 2020 and 2022 according to our survey of how banks handle their obligation to offer payment accounts to consumers.³ In some cases, the banks justify the closures by saying they see an elevated risk of money laundering.

FI takes the position that the banks need to work more actively with lowering the threshold for being able to own an account that as a minimum can be used for some day-to-day needs. We will prioritise this in our ongoing supervision. FI also considers there to be grounds on which to implement statutory requirements on banks to assess risk-mitigation measures before they deny or terminate an account. (See *Need for new rules*).

³ *Rätten till betalkonto – redovisning av Finansinspektionens tillsyn*, Finansinspektionen, 2023-12-15.

FI will follow up in its ongoing supervision the results from the survey of the right to a payment account. We also intend to continue to gather statistics from banks to be able to follow the development.

Deficient financial literacy

FI's household survey shows that one out of four Swedes is lacking basic financial literacy.⁴ They do not understand concepts such as *interest rate* and *inflation*. Almost one-fifth have not heard about home insurance. Consumers who do not have this type of knowledge may have difficulty, for example, starting to save or buying insurance policies that they need. They could also be more likely to buy unsuitable savings and insurance products or choose the wrong risk level in their savings.

FI holds training and communication events for various target groups to strengthen financial literacy. We are also working actively to reach consumers on a broad front to give them the tools to make well-founded decisions on the financial market. We do this through traditional media, social media and our own channels. We can see that our efforts are helpful, even though our current resources only allow the possibility of marginal impact.

Fraud linked till financial services

Fraud is a major problem for society. Reports to the police regarding investment fraud have increased sharply: from 2,566 in 2022 to 3,956 in 2023.⁵ Through so-called social manipulation, consumers are tricked into investing money in something that they believe is safe and profitable. Instead, the money goes straight into the pocket of the fraudster. In other types of fraud, consumers can be tricked to transfer money to an account by logging in with BankID. For example, the fraudsters might pretend they are calling from the consumer's bank or from an authority. Often, large sums are lost. In addition to suffering economic damages, many also feel bad and are ashamed that they were tricked.

We use our website and social and traditional media to offer tips to consumers on how they can avoid being tricked and what they can do if they have been a victim of fraud. We also publish quarterly summaries on investment fraud. In addition, we are targeting this problem through our financial literacy initiatives.

FI has a warning list identifying firms that do not have the necessary authorisation. Most of the warnings are related to companies that offer fake investments in so-

⁴ *Hushållens ekonomi och finansiella förmåga*, Finansinspektionen, 2023-06-12.

⁵ The Swedish National Council for Crime Prevention's database of reported crime, <https://bra.se/statistik/kriminalstatistik/anmalda-brott.html>, data downloaded on 2023-03-19.

called CFD contracts (contracts for difference, a type of derivative) and cryptoassets. In several cases, the companies have closed their websites after the warning was published. The majority of the warnings are based on events outside of Sweden. FI receives information from foreign authorities and makes the decision to publish the information. In total, FI published approximately 3,300 warnings in 2023, which was almost as many as the record-setting year in 2022.

Our supervision entails reviewing how banks and other payment service providers are working to prevent fraud. In the autumn of 2023, we were tasked by the Government to report on this supervision. The report must be submitted no later than May 31, 2024. As part of this assignment, we are also looking at how payment service providers' products and services are used for fraud and how payment service providers are working to prevent this.

Unsuitable savings and insurance products

On the Swedish market, a number of products are still offered that are expensive and complex. We see that distributors are selling these products on a broad front despite them being unsuitable for most consumers. We also see that consumers are being encouraged to purchase insurance policies that they do not need.

Products can be unsuitable for different reasons, and these reasons also often are related to one another. Here are some examples:

- The products can be **complex**. This means it is difficult to understand how a product works, when it can give a return, and what risks it entails. For example, some structured products are unsuitable for most consumers⁶. At the same time, we see that these types of products are described in a **misleading** manner in order to appear like simpler funds, for example.
- These products can be **unnecessary**. For example, gadget insurance is often both unnecessary and expensive.⁷
- The products can be **expensive**. When the fee is high, the entire return, or a large part of it, disappears; in other words, the amount the consumer is hoping to earn on the product. Structured products can have high fees. The same applies to unlisted corporate bonds, some funds, and endowment insurance.
- These products can be **very volatile**. A volatile product can rise or fall in value very quickly. This is true of, for example, warrants⁸ and cryptoassets.

⁶ Structured products are financial instruments whose return is completely or partly dependent on the development of other instruments or assets, such as equity-linked bonds, index certificates, autocalls, sprinters and loan certificates.

⁷ *Behövs tilläggs- och produktförsäkringar?* Finansinspektionen, 2023-02-16.

⁸ A warrant is a listed option with a long maturity.

Cryptoassets

Investing in cryptoassets is very risky since they are complex, have volatile prices, and are difficult to value. Cryptoassets are often used for criminal purposes.⁹ In addition, a large portion of cryptoasset trading has a significant negative impact on the climate. The crypto market is currently unregulated, which means there are no rules to protect the consumer. However, the MiCA Regulation (*Markets in Crypto-Assets Regulation*) will enter into force in 2024. This regulation is a joint regulation for cryptoassets, which are not currently covered by the EU's regulatory framework for financial services. The MiCA Regulation subjects some cryptocompanies to supervision for the first time. In addition, consumers also gain the right to more information about the products, and the requirements safeguarding consumers' assets are being tightened. In some cases, consumers also gain the right to redemption and the right of withdrawal.

Even with the entry into force of the MiCA Regulation, trading in cryptoassets will continue to be highly risky and unsuitable for most consumers. Therefore, we will continue to encourage consumers to use considerable caution when purchasing cryptoassets.

Conflicts of interest in distribution

Over the years, FI has seen how advisors sell bad and expensive products to consumers because they are rewarded with high commissions. We regularly intervene against unsuitable investment advice by withdrawing authorisations and issuing warnings. When the consumer chooses one fund over another, the person executing the transaction can receive a commission that is as much as ten times higher than if the consumer had chosen a different product. We note that the supply of independent advisory services is still small – only a few firms offer it.

During the year, FI will close an ongoing investigation into investment advice. We are also planning two in-depth analyses. One is an analysis of remuneration and commission models for insurance intermediaries who distribute savings insurance, and the other is an analysis of the risks present when consumers save via digital platforms. In the latter, we will review in part how banks and investment firms conduct their digital suitability assessment, which should indicate if the offered product is suitable for the consumer.

In addition, we are working with the European Commission's proposed legislative package for retail investments.¹⁰ The proposal aims to review the joint rules for savings and insurance products that are offered to consumers.

⁹ *Penningtvätt och finansiering av terrorism med kryptovalutor*, Polismyndigheten, 2022-11-30

¹⁰ *Retail investment strategy*. European Commission, 2023-05-24.

Unnecessary gadget insurance

Insurance undertakings and insurance intermediaries are obligated by law to only offer insurance products that meet consumers' actual needs.¹¹ Despite this, we are seeing that they are selling gadget insurance to consumers who do not need them. Often, gadget insurance is unnecessary.¹²

Many gadget insurance policies are sold by so-called ancillary insurance intermediaries that do not have their own authorisation, for example electronics chains. The intermediary then is paid by the insurance undertaking. This can lead to the consumer being offered gadget insurance that they do not need.

In 2023, FI started an in-depth analysis to determine to what extent non-life insurance undertakings are distributing insurance products through ancillary insurance intermediaries that do not have their own authorisation. One area we are looking at is how high payments for damages are in relation to paid premiums and how large the remuneration is that is being paid to the intermediaries. The work on this analysis will continue during 2024.¹³

Risky products offered via telephone and social media

FI is receiving an increasing number of complaints from consumers who have invested in a financial product that is offered via telephone or social media. The salesperson does not provide enough information about the risks associated with the investment, and the consumer therefore does not understand that the money is invested in products that can fall in value very quickly. In many cases, the firm is authorised in a different country.

FI has established contact with the supervisory authorities in the countries where the firms in question have received their authorisation. We are also taking preventive measures by informing consumers about risky investments.

Manipulation in social media

FI often sees signs of suspected market manipulation in social media. Someone tries to influence the people around them to buy or sell a certain share by spreading misleading information with the aim of influencing the price of the share. Sometimes the information is completely fabricated, but often it is based on facts that are angled in an excessively positive or negative manner. Sometimes the information is old news that is being spread again without clearly emphasising the date.

¹¹ Chapter 4, section 1 of the Insurance Distribution Act (2018:1219).

¹² *Behövs tilläggs- och produktförsäkringar?* Finansinspektionen, 2023-02-16.

¹³ *Fördjupad analys – sidoverksamma försäkringsförmedlare*, Finansinspektionen, 2023-10-19, FI Refs. 23-28778 to 23-28842.

FI has also noted how several people collude to buy the same share, and then spread excessively positive information about the share on social media. There are also groups that write about a specific share but only allow positive comments; negative comments are removed.

FI is working proactively to educate consumers on the risk of market manipulation in social media via, for example, our website and social media. In addition, we have close contact with banks so they will become better at identifying market manipulation. We are also working with other authorities on this matter.

Unsound lending

Due to high interest rates and high inflation, many consumers are having difficulty making ends meet. In 2023, mortgage rates hit their highest level since 2008.¹⁴ A mortgage borrower today needs to use a significantly larger share of their disposable income than before on interest rate and amortisation payments.¹⁵ Some have used consumer credit to meet their daily expenses. Multiple have therefore experienced problems with debt.¹⁶

Today, it is easy to receive offers for credit, both in e-commerce and in physical trading. Consumers can easily choose to buy first and pay later. A survey conducted by the Swedish Consumer Agency shows that many consumers do not understand that they are shopping with borrowed money when they choose to pay by invoice.¹⁷ This view is strengthened by statistics from the Swedish Enforcement Authority showing that invoices are the credit that gives rise to most payment orders.¹⁸

Borrowers who do not successfully pay off their loan can quickly be burdened by large costs. Switching a loan to longer repayment terms can appear to be a simple solution since it lowers the monthly fee. However, it raises the total cost for the loan.

¹⁴ *Den svenska bolånemarknaden 2023*, Finansinspektionen, 2024-03-07. An English version is available.

¹⁵ New mortgagors in 2023, after interest rate deductions, used on average 18 per cent of their disposable income for interest and amortisation payments. This represented an increase of approximately seven percentage points compared to the period 2017–2021. Source: *Den svenska bolånemarknaden 2023*.

¹⁶ *Stor ökning av svenskarna skulder hos Kronofogden*, Kronofogdemyndigheten, 23-01-2024, <https://kronofogden.se/om-kronofogden/nyheter-och-press/pressmeddelanden/2024-01-23-stor-okning-av-svenskarnas-skulder-hos-kronofogden>.

¹⁷ *Många handlar för lånade pengar utan att förstå det*, Swedish Consumer Agency, 2023-10-25. konsumentverket.se/aktuellt/nyheter-och-pressmeddelanden/pressmeddelanden/2023/manga-handlar-for-lanade-pengar-utan-att-forsta-det/.

¹⁸ See *Långivarens betydelse för betalningsproblem*, Andersson, M.K. and M. Üye, FI Analysis 35, Finansinspektionen, 2021.

Payment problems can be caused by life events, for example divorce or illness, that reduce the borrower's income. They can also be due to the cost of the loan being too high already from the start. In this case, the lender has failed in their assessment of whether the borrower is able to afford the payments associated with the loan. We see that insufficient credit assessments more often lead to payment problems.¹⁹

Suitable credit checks prevent over-indebtedness

Before a consumer is granted a loan, the lender must assess whether the consumer has the financial ability to pay back the loan. The lender then needs to collect and verify enough information about the consumer's financial situation to be able to make a well-founded decision. Some lenders collaborate with one or several credit brokers who function as an application channel. The credit broker gathers data about the consumer, which the lender uses in the credit check. However, relevant information can be missing from the data. Even though it is the lender who is responsible for the credit check, we see that there are terms in the agreement between the lender and the broker that prevent the lender from requesting supplemental information from the consumer.²⁰

FI prioritises separate supervision of consumer credit undertakings that largely issue high-cost loans. These loans often lead to payment problems. Around 17 per cent of high-cost loan borrowers receive collection notices. For one out of four, the debt is registered with the Swedish Enforcement Authority.²¹ The loans are generally small and should be paid off in a short period of time. The interest rate can be up to 40 per cent plus the reference rate. Often, consumers with small margins in their finances take high-cost loans.

During the year, FI will conduct several investigations into consumer credit undertakings' credit checks. As part of these investigations, we will look specifically at how lenders are using data that is gathered via credit brokers. Two cases are currently being heard by the Court of Appeal after sanction decisions against two companies that FI takes the position has conducted insufficient credit checks.

We are also reviewing the regulations on reporting from consumer credit undertakings to gain access to data that could improve our supervision.

¹⁹ See *Långgivarens betydelse för betalningsproblem*, Andersson, M.K. and M. Üye, FI Analysis 35, Finansinspektionen, 2021.

²⁰ See *Konsumentskyddsrapport 2023*, Finansinspektionen, 2023-03-21, page 4.

²¹ *Stor ökning av svenskarna skulder hos Kronofogden*, Kronofogdemyndigheten, 23-01-2024, <https://kronofogden.se/om-kronofogden/nyheter-och-press/pressmeddelanden/2024-01-23-stor-okning-av-svenskarnas-skulder-hos-kronofogden>.

As of 1 January 2024, FI is responsible for debt collection supervision. We started a regulation project to prepare new rules during 2024 for how debt collection companies live up to the requirement on good debt collection practices.

Reporting

FI reports here on the work it has done during 2023. The selection includes activities that have been completed.

Financial exclusion

FI surveyed how banks are handling their obligation to offer payment accounts to consumers.²²

Fraud

In addition to our regular work to warn and inform consumers about the risk of fraud, during the autumn we targeted social media in an initiative that focused on investment fraud.²³ This enabled us to reach consumers on the platforms where fraudsters market their false investments.

Unsuitable savings and insurance products

In 2023, we conducted the following activities:

- In-depth analysis of 13 insurance intermediaries.²⁴
- Investigation into investment firms' investment advice.²⁵
- In-depth analysis of internal governance and control of marketing.²⁶
- In-depth analysis of sustainability preferences during investment advice.²⁷
FI also published a report on the results of the in-depth analysis.
- Review of non-life insurance undertakings' processes for product approval.²⁸
- Survey of how transfers of individual occupational pension insurance between and within insurance undertakings and occupational pension undertakings works, how it has developed, and any legal and practical obstacles to transfers.²⁹
- Investigation into an investment firm that distributes complex products.

²² *Rätten till betalkonto – redovisning av Finansinspektionens tillsyn*, Finansinspektionen, 2023-12-15.

²³ *Annonskampanj från FI för att stoppa investeringsbedrägerier*, Finansinspektionen, 2023-11-15.

²⁴ *Fördjupad analys - kartläggning av finansiella instrument förmedlade av försäkringsförmedlare*, Finansinspektionen, 2023-02-28.

²⁵ FI Ref. 22-30060.

²⁶ *Fördjupad analys Interna riktlinjer avseende marknadsföring*, Finansinspektionen, FI Ref. 23-24451, 2023-12-18.

²⁷ *Fördjupad analys om hållbarhetspreferenser vid investeringsrådgivning*, Finansinspektionen, FI Ref. 23-17298.

²⁸ *Skadeförsäkringsföretagens process för produktgodkännande*, Finansinspektionen, 2023-06-29.

²⁹ *Flytt av individuell tjänstepensionsförsäkring*, Finansinspektionen, 2023-09-15.

- Analysis of the benefit of cover and gadget insurance.³⁰
- Analysis of how much of the premium for housing, auto, pet and boat insurance is used to compensate for damages or finance the operations in respect of how much is left as profit for different types of insurance. The same report also compares profit-distributing and mutual insurance companies.³¹
- Analysis of whether loyal insurance customers in Sweden pay more for their home and auto insurance – products that are important for many consumers.³²
- FI worked in 2023 in several international consumer protection committees.
- Information via traditional media and own channels about what consumers should think about when making investments and signing up for insurance.
- Every quarter, FI publishes the holdings of Swedish UCITS. This contributes to transparency for consumers who are saving in Swedish UCITS.
- Every quarter, FI publishes the median fee for certain product categories of UCITS. This makes it possible for Swedish consumers to compare the fee of their own funds with the median fee.

Unsound lending

In 2023, we conducted the following activities:

- New's general guidelines on credits in consumer relationships.³³
- Information for consumers through media and own channels about what they should think about to avoid taking on high debt.
- Preparations to take over debt collection supervision from the Swedish Authority for Privacy Protection, which we did on 1 January 2024. This change has meant that consumers can now turn to FI with questions related to debt collection operations.

³⁰ *Behövs tilläggs- och produktförsäkringar?* Finansinspektionen, 2023-02-16.

³¹ *Vad går konsumenternas försäkringspremier till?* Finansinspektionen, 2023-12-07.

³² *Får lojala försäkringstagare betala mer?* Finansinspektionen, 2023-07-01.

³³ FFFS 2023:20, Finansinspektionen, 2023-06-20.

Need for new rules

FI describes the need for new rules to strengthen consumer protection.

Rules should be moved to the Consumer Credit Act

Since 2020, it is forbidden for payment service providers to offer credit as the first alternative in e-commerce or in some other way emphasise the credit option if other alternatives exist. This regulation is only included today in the Payment Services Act. However, e-retailers can choose to design a cash solution on their website and collaborate with several different payment service providers. FI must then target its supervision on one payment service provider among several and that only provides one payment alternative. E-retailers can also offer loans without collaborating with a payment service provider and thus is not subject to the rules of the Payment Services Act. FI takes the position that the rules should be moved to the Consumer Credit Act, which we have asserted previously, in part in the report *Marknadsföring av betaltjänster online*³⁴. The rules would then apply to anyone offering or brokering loans to consumers.

Legislative requirements on assessment before the bank denies a payment account

FI would like to see a legislative requirement on banks to assess on a case-by-case basis if they can manage risks of money laundering and terrorism financing through measures other than terminating a customer's payment account or denying the customer a payment account when they apply for one. It should be clearer than it is today that the bank must assess the customer's risk profile at an individual level and not make broad decisions about groups of consumers. We have previously highlighted this in our consultation comments to the Payment Inquiry (SOU 2023:16).³⁵

Proposal from the Over-indebtedness Inquiry

Swedish consumers need stronger credit protection. Therefore, FI considers several key proposals from the Over-indebtedness Inquiry's report (SOU 2023:38) should be implemented, which we also stated in our consultation comments.³⁶ Particularly important is the proposal of a debt register. Such a register could provide an overview of all consumers' existing loans, which would enable lenders to conduct

³⁴ *Marknadsföring av betaltjänster online*, Finansinspektionen, 2024-02-14

³⁵ Consultation comments: *Staten och betalningarna* (SOU 2023:16), Finansinspektionen, 2023-10-31, FI Ref. 23-17476

³⁶ Consultation comments: *Ett förstärkt konsumentskydd mot riskfylld kreditgivning och överskuldssättning* (SOU 2023:38), Finansinspektionen, 2023-11-06, FI Ref. 23-19887

better credit checks. We would also like to emphasise the proposal of an interest-rate ceiling of 20 per cent and the proposal to increase the cost ceiling. The cost ceiling would entail that what the consumer pays in interest and fees may at the most correspond to the borrowed amount. If the consumer borrowed SEK 10,000, the interest and fees at the most may amount to SEK 10,000 per year. Today such a cost ceiling only applies to so-called high-cost loans.

Fair interest differential compensation

Mobility on the mortgage market needs to be strengthened – it should be easy to switch banks. The current model for interest differential compensation creates lock-in effects, however, and prevents customer mobility. For this reason, FI welcomes the Government's proposal for fairer interest differential compensation, which we have stated in our consultation comments.³⁷ This would mean that consumers in most cases may pay a lower interest differential compensation to the bank when they repay a fixed loan early. The change would also promote competition on the mortgage market since a lower interest differential compensation reduces the risk that compensation prevents borrowers with fixed rates from switching banks.

Statistics of households' assets and liabilities

FI believes that the proposals presented in the inquiry *En ny statistik över hushållens tillgångar och skulder* (SOU 2022:51) would significantly streamline its work for enhanced consumer protection.³⁸ Using the new statistics, we would be able over time to follow the development of individuals' assets, liabilities, income and loan service payments. This would make it easier for us, for example, to take measures to reduce the risk of payment problems since we would know, among other things, how many consumers have small margins.

EU's Consumer Credit Directive

In a few years, the EU's new Consumer Credit Directive will be implemented in Sweden. The directive strengthens consumer protection. FI welcomes stricter requirements on some of e-commerce's invoices and that the requirements on credit assessments are tightened. We are also positive to consumers being able to receive personal explanations for their credit checks in the event some form of automatic handling of personal data has been used.

³⁷ Consultation comments: *En rättvis ränteskillnadsersättning som minskar hindren mot längre räntebindningstider*, Finansinspektionen, 2023-12-21, FI Ref. 23-29084.

³⁸ Consultation comments: *En ny statistik över hushållens tillgångar och skulder* (SOU 2022:51), Finansinspektionen, 2023-03-14, FI Ref. 22-34852.

EU proposal on regulatory framework for better consumer protection

FI welcomes the European Commission's proposal on a legislative package for retail investments that aims to strengthen consumers' positions when they invest in savings and insurance products.³⁹ As presented in this report, we have seen in our supervision problems related to both commissions and expensive products. We know that consumers are enticed by recommendations in social media to make unsuitable investments. Foreign companies also contact and encourage consumers to invest in unsuitable products. In 2024, FI will support the Ministry of Finance in its negotiations regarding the proposal. We are also working with the proposal as part of our participation in the working groups linked to the European Securities and Markets Authority (ESMA). At the same time, we want to emphasise that there are differences between the savings market in Sweden and what this market looks like in general in other EU countries. For example, Swedish consumers have access to a relatively large supply of investment and insurance products. In January, we therefore submitted our preference to the Government for a national inquiry to, among other things, analyse the conflicts of interest on the savings market and develop measures to counteract them.⁴⁰

³⁹ *Retail investment strategy*. European Commission, 2023-05-24.

⁴⁰ *Utredning för en bättre sparmarknad*, Finansinspektionen and Swedish Insurance Broker's Association, 2024-01-04.
<https://www.fi.se/sv/publicerat/nyheter/2024/utredning-for-en-battre-sparmarknad>.