

INDEPENDENT SERVICE AUDITOR'S REPORT

To: Diñeiro Pty Ltd

Scope

We have examined Diñeiro Pty Ltd's ('Diñeiro') accompanying description of its Consumer Data Right System (the 'Description'). The Description is based on the Competition and Consumer (Consumer Data Right) Rules 2020 set out by the Australian Competition and Consumer Commission (ACCC) on 4 February 2020 addressing the Schedule 2—Steps for privacy safeguard 12—security of CDR data held by accredited data recipients ('CDR Criteria') and the suitability of the design and implementation of controls stated in the Description as of 25 January 2024, to provide reasonable assurance that Diñeiro's system requirements were achieved based on the CDR Criteria.

Diñeiro uses Amazon Web Services ('AWS' or 'subservice organisations') to provide cloud hosting services. The CDR Criteria requires complementary subservice organisation controls to be suitably designed and operating effectively by AWS, along with controls at Diñeiro, to achieve Diñeiro's system requirements. These controls have been reviewed by Diñeiro management. Our examination included an assessment of these subservice organisation controls and the procedures performed by Diñeiro to verify these controls are appropriate to Diñeiro's reliance on AWS in meeting the system requirements.

The Description includes complementary user entity controls that are necessary, along with controls at Diñeiro, to achieve Diñeiro's system requirements based on the CDR Criteria. The Description presents Diñeiro's controls, the CDR Criteria, and the complementary user entity controls assumed in the design of Diñeiro's controls. The complementary user entity controls have not been assessed by our examination and remain the responsibility of those related entities to complete their own review engagement in accordance with the Consumer Data Right Rules set out by the ACCC.

Service Organisation's Responsibilities

Diñeiro is responsible for its system requirements and for designing and implementing controls within the system to provide reasonable assurance that Diñeiro's system requirements were achieved. Diñeiro has provided the accompanying assertion titled "Assertion of Diñeiro Pty Ltd Management" (the 'Assertion') about the Description and the suitability of the design and implementation of controls stated in the Description to meet the CDR Criteria. Diñeiro is also responsible for preparing the Description and Assertion, including the completeness, accuracy, and method of presentation of the Description and Assertion; managing the system covered by the Description; stating the controls in the Description related to the system requirements; and identifying the risks that threaten the achievement of the Diñeiro's system requirements.

Our Independence and Quality Control

We have complied with the relevant ethical requirements relating to assurance engagements, which include independence and other requirements founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

In accordance with Auditing Standard ASQC 1 Quality Control for Firms that Perform Audits and Reviews of Financial Reports and Other Financial Information, and Other Assurance Engagements, AssuranceLab Pty Ltd maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Service Auditor's Responsibilities

Our responsibility is to express an opinion on the Description and on the suitability of design and implementation of controls stated in the description to meet the CDR Criteria based on our examination. Our examination was conducted in accordance with the Standard on Assurance Engagements ASAE 3150: Assurance Engagements on Controls. Those standards require that we plan and perform our examination to obtain reasonable assurance about whether, in all material respects:

- the Description is presented in accordance with the CDR Criteria;
- the controls stated in the Description were suitably designed to provide reasonable assurance that Diñeiro's system requirements were achieved based on the CDR Criteria; and
- we believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

A review of the description of Diñeiro's system and the suitability of the design and implementation of controls involves the following:

- Obtaining an understanding of the system and Diñeiro's system requirements.
- Assessing the risks that the Description is not presented in accordance with the CDR Criteria and that controls were not suitably designed.
- Performing procedures to obtain evidence about whether the Description is presented in accordance with the CDR Criteria.
- Performing procedures to obtain evidence about whether controls stated in the Description were suitably designed to provide reasonable assurance that Diñeiro achieved its system requirements based on the CDR Criteria.
- Evaluating the overall presentation of the Description.

Inherent Limitations

There are inherent limitations in any system of internal control, including the possibility of human error and the circumvention of controls.

This reasonable assurance engagement was conducted on the Consumer Data Right System as designed and implemented prior to Diñeiro's application to become a Consumer Data Right Representative. Accordingly, certain aspects of the system design and implementation were assessed, and conclusions formed based on documented plans and designs that are yet to operate in a live environment.

Opinion

In our opinion, in all material respects,

- a) the Description presents Diñeiro's Consumer Data Right System that was designed and implemented as of 25 January 2024, in accordance with the CDR Criteria; and
- b) the controls stated in the Description were suitably designed as of 25 January 2024, to provide reasonable assurance that Diñeiro's system requirements would be achieved based on the CDR Criteria, if its controls operated effectively as of that date and if the complementary subservice organisation controls and complementary user entity controls assumed in the design of Diñeiro's controls operated effectively as of that date.

Restricted Use

This report is intended solely for the information and use of Diñeiro and Yodlee for the purposes of Yodlee's assessment of Diñeiro as a CDR Representative under the Consumer Data Right. This report is not intended to be, and should not be, used by anyone other than these specified parties.

Erika Villanueva

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