

Cost-benefit assessment pursuant to the Statistics Act § 10 (5)

Collection of payment transactions via BankAxept from Nets Branch Norway

Statistics Norway's (SSBs) cost-benefit assessment for obtaining information on payment transactions.

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The assessment describes the need for collection and use of payment transactions via BankAxept from Nets Branch Norway (hereinafter Nets). Data will be used in established official statistics and for the development of new official statistics within the framework of the National Statistics Program 2021-2023.

The benefit is related to the fact that BankAxept transactions from Nets can be utilized as a new source in various official statistics that Statistics Norway produces and thus contribute to improving quality and timeliness in the production of statistics. Utilization of BankAxept transactions as a source of more statistics can at the same time help to reduce the workload for those required to do so because data collection becomes more efficient and coordinated. In addition, this will help to reduce Statistics Norway's use of resources related to data collection and processing of data.

The costs of collecting payment transactions from Nets are largely related to privacy consequences because some statistical purposes require that transaction data be compared with other personally identifiable information. Statistics Norway will therefore consider how data collection can be minimized, both in the short and long term, as well as implement sound privacy protection measures - and data security measures.

Responsible unit: Department of Personal and Social Statistics

Date: 29.03.2022

Applicant (s): Nets Branch Norway

Reporting frequency: Data containing information on payment transactions from and including 01.01.2022 must be submitted. Technical solution and frequency of transfers are specified in more detail in dialogue with Nets, with a requirement for monthly deliveries as a minimum.

Description of data that respondents must report: Information corresponding to what Nets delivered in 2021 must be reported with data from 2018. It includes the following fields that have relevant information related to completed payment transactions via BankAxept:

- transaction date
- transtypestatus
- card service
- user site number
- username
- kortinnehAccount no
- item purchase amount
- total amount

Statistics Norway has been made aware that a delivery of these characteristics may mean that Nets must cooperate with Vipps on extraction, facilitation and reporting.

Anchoring in the national statistics program

The purpose of collecting transaction data is:

- to produce official statistics according to the statistics program, more specifically
 - statistics on [consumption in Norwegian households](#), cf. chapter 5.8, Income and consumption in the [national statistics program](#)
 - new official diet statistics, cf. chapter 5.7, Health and care in the national statistics program. Statistics Norway is now developing the statistics on behalf of the Norwegian Directorate of Health. The development work is anchored in the [letter of intent for a healthier diet](#) , an agreement between the health authorities and the food industry (business organizations, food and beverage producers, the grocery trade and the catering industry)
- to study the use of transaction data for the production of other official statistics that use data on turnover and price development of goods and services in the production of statistics. This includes:
 - retail trade and business services, cf. chapter 5.20 in the statistics program
 - transport and tourism, cf. chapter 5.16 in the statistics program
 - enterprises, enterprises and accounting, cf. chapter 5.21 in the statistics program
 - the use of private health services, cf. chapter 5.7 in the statistics program

2. Justification that the information is necessary

One of the main goals in [Statistics Norway's strategy](#) is that we will collect, use and share data for the benefit of society. We will contribute to quality and continuity in basic data and utilize the growth in new data sources. Statistics Norway shall also ensure efficient collection, use and sharing of data. In the allocation letter for 2021, the Ministry of Finance has specified that Statistics Norway will utilize data from new and existing data sources in its development work in order to continuously improve statistics, analysis and research. Transaction data from Nets is highlighted as an important data source (cf. Chapter 3.3 in the [State Budget 2021 - Statistics Norway - allocation letter \(PDF\)](#)) .

Statistics Norway has previously received data for testing and development of official statistics from Nets, which contains all payment transactions from BankAxept for 2018. It is desirable that the content and specifications of this delivery are used as a basis for future deliveries from Nets as described in the introduction.

Consumption statistics

Statistics Norway has published consumption statistics since 1958. The purpose of the statistics is to provide a detailed picture of Norwegian households' annual

consumption of goods and services. There is a great demand for statistics. Among other things, the Ministry of Finance uses the figures to say something about the distributional effects of tax changes and revenue calculations when introducing new taxes. NAV uses the Consumption Survey to calculate housing costs that are included in child allowance. For many years, the Norwegian Directorate of Health has used figures from the Consumption Survey to calculate the development in the Norwegian diet. The figures are also the most important component in the reference budget for consumption expenditure that the banks use as a basis for allocating mortgages. Internally in Statistics Norway, the statistics are important as a weighting basis for the Consumer Price Index (CPI) and for auditing the national accounts.

Until 2012, data on household consumption were collected through sample surveys, where both sample bias and underreporting led to quality challenges. This was especially true for groceries, where the volume of goods - and thus the risk of underreporting was greatest, but also for other product groups to be reported.

A study of previously received test data from Nets shows that payment transactions can be used to improve the quality of statistics in several areas. Among other things, payment transactions can be linked to receipts, in order to obtain better estimates at item level. In addition, the payment transactions provide valuable information to assess the quality of reported purchases in the sample survey, and the payments can be used as a direct source for certain product and service groups. Payment transactions are also a relevant source for developing consumption statistics with new statistical products with higher relevance than can be achieved with sample surveys.

The statistics shall reflect the consumption pattern for Norwegian households throughout the year. Statistics Norway therefore needs data for an entire calendar year.

Diet statistics

The Norwegian Directorate of Health uses statistics on developments in the Norwegian diet in the administration of its area of authority with the Consumption Survey as the source. Statistics Norway will develop and publish new official statistics on the diet of the Norwegian population based on new data sources.

Statistics Norway will be able to develop new and highly sought-after statistics on developments in the Norwegian diet. The statistics will have a much higher quality and degree of detail than before as a result of the access to transaction data from Nets, combined with e.g. receipt data from the grocery chains, data on nutrient content in the food and household information from Statistics Norway's administrative register. This applies, for example, to statistics that present how the diet of the Norwegian population varies with socio-economic background factors such as income, education and labor market affiliation, and how it varies with demographic and geographical dimensions. It is important to bring out regional, demographic and social differences in diet since this is a key dimension when the population's living habits are to be measured and quantified.

In sum, the statistics will contribute to a far better knowledge base on developments in the Norwegian diet with higher quality and level of detail than before. This is also in line with how it is expressed in the health authorities' action plans and in a letter of intent on a healthier diet entered into between the health authorities and the food industry.

The statistics must cover transactions throughout the calendar year. The statistics can be published with high relevance, but the starting point is to establish an annual statistic that can gradually be further developed both in terms of publishing content and frequency in close collaboration with the data sources and other partners.

Business cycle statistics for the business sector

Transaction data from Nets has the long-term potential to be included as a data source for business cycle statistics for the business sector. The primary area of use for transaction data will in the longer term be to construct turnover values at company level, but also indirectly for quality assurance of statistical basis, weights and calibration of other results. Statistics Norway currently receives aggregated transaction data daily from Vipps AS for BankAxept and VippsNetthandel at enterprise level for all industries in Norway. Detailed data for each individual BankAxept transaction from Nets is considered in the long term as an alternative source for aggregating / estimating monthly turnover for the individual business and enterprise where such transactions are dominant, either alone or together with other payment instruments.

The use of health services

Obtaining payment transactions from Nets can also be used for more comprehensive statistics on who uses private health services and what these cost. Among other things, it will be able to supplement already existing data sources regarding self-payment, production and use of private health services such as dental health services, medical services, physiotherapy services, chiropractor services, psychologist services and laboratory services. As of today, the Health Accounts in many cases use sample surveys in combination with annual figures for the private health sector to estimate expenses for deductibles in the use of various private health services.

Assessment of whether Statistics Norway can achieve the purpose by using information from public authorities:

This information at this level of detail is currently not available from Statistics Norway or other public authorities. Statistics Norway currently receives transaction data from BankAxept daily, but this data has a different form and content than is needed. Data received today is aggregated data per enterprise per day, which is not possible to connect to person.

4. Assessment of burden and cost for those required to provide information

The burden on those required to provide information in this context is about three factors:

- charge for Nets as a provider of transaction data
- reduced burden for people / households participating in a traditional survey
- reduced burden for Vipps if this reporting in the longer term can replace the delivery Statistics Norway receives from Vipps as of today

Decisions on the delivery of payment transactions from Nets are part of Statistics Norway's strategy for developing flexible technical solutions for the collection and

processing of new data sources. The form of delivery shall over time have the least possible technical cost for the person required to report.

In dialogue with Nets, Statistics Norway has come to understand that withdrawals of payment transactions will be feasible for Nets, as long as the account number is the defined sample unit. However, Nets has expressed that it will require a lot of resources to make a sample-specific extract of payment transactions from their systems, as the systems are to a small extent adapted to this. After reviewing various alternatives, Nets, in collaboration with Statistics Norway, has decided that the best solution is to extract all transaction data for a given period of time. This corresponds to the delivery of data for testing and development of official statistics that Nets has already sent to Statistics Norway.

An efficient and coordinated data collection reduces costs for suppliers of payment transactions and in the longer term Statistics Norway's own costs related to data collection and processing of data. Payment transactions from Nets are assumed in the slightly longer term to be able to reduce the task burden on the business

community by replacing form-based data capture for companies where BankAxept covers much of the sales revenue.

The use of payment transactions in the data basis for consumption statistics will also contribute to a significantly reduced task burden for individuals / households who have been selected as participants in the reporting. Over time, the delivery from Nets will also be able to replace current deliveries from Vipps, and in this way coordinate deliveries to various statistical products in Statistics Norway.

5. Description and justification for the use and processing of personal data, if Statistics Norway requests such

Payment transactions from Nets contain the ID of the cardholder in the form of an account number. This information is unique and personally identifiable. In order to meet the statistical needs of the consumption statistics and the diet statistics, there will also be a need to compare payment transactions from Nets with other personally identifiable information

personally identifiable information.

In order to obtain information on purchases of goods at the level of detail required by the Consumption and Diet Statistics, Statistics Norway will link the payment transactions from Nets to receipts for purchases in the large grocery chains in Norway. As of today, Statistics Norway collects receipt data from the four largest grocery chains. A link between a payment transaction made with a debit card and a grocery receipt enables Statistics Norway to link a payment transaction and receipt for just over 70 per cent of grocery purchases.

When the purchases are linked to person / household, it will be possible in the consumption statistics and diet statistics to analyze socio-economic and regional differences in consumption, and link it to variables such as income, education and place of residence. There is also a great demand for statistics that can follow the development in diet distributed among different groups in the population, in order to gain a broader knowledge of social inequality in health. This is possible by utilizing the link between receipt, transaction and person / household to calculate the nutritional content of the consumption of groceries.

In order to utilize payment transactions in business cycle statistics for the business sector, there is no need to link data to personally identifiable information, and data can be arranged so that only user location information will be available as an identifier.

The further assessment of privacy consequences is therefore aimed at utilizing transaction data for consumption and diet statistics.

6. Description of the sensitivity of the information

Payment transactions via BankAxept from Nets Branch Norway are personally identifiable. They identify both the cardholder and the account owner and show all transactions made with a debit card with an indication of time and place of use (eg shop). In addition, the payment transactions may indirectly include special categories of personal information in that the type of place of use may indicate, among other things, the account holder's religion, political opinion, health information, trade union membership or sexual relationships.

Statistics Norway currently uses personally identifiable information in large parts of

Statistics Norway currently uses personally identifiable information in large parts of the official statistics that Statistics Norway publishes, through our use of data from public registers. This also applies to special categories of personal information, such as health information.

Statistics Norway emphasizes that payment transactions are peculiar both in view of the large amount of data and that this is information that does not already exist in public registers. In addition, Statistics Norway will receive data frequently and with a high degree of detail. There are therefore several important reasons why Statistics Norway will handle data on payment transactions with extra care, and implement extra measures to protect privacy and safeguard data security, in addition to the comprehensive protection measures that already include register data.

An important consideration for Statistics Norway's work with this type of data is that the persons to whom the information applies cannot be expected to be aware that the information is collected and processed by Statistics Norway. The individual registrant can also not be expected to be aware that Statistics Norway will use the

data from grocery purchases, and further compare these with other personally identifiable data, to create statistics.

However, the registered person can be expected to be aware that the information is being registered and is available to the banks which, among other things, offer various online banking services based on the information. Data is also used commercially by banks for analyzes and insight products. Data from BankAxept is also sold to market analysts, but in an aggregated form that is not personally identifiable.

Payment transactions may also be market-sensitive for companies where BankAxept accounts for a high share of turnover. Such turnover data with high relevance may have special market interest, be stock exchange sensitive, or be detrimental to the company's competitive situation if the information goes astray.

7. Description of special information security measures, if there is a need for such

The disadvantages described in section 6 are partly remedied by general security measures that apply to all processing of statistical information in Statistics Norway. The information shall only be used for statistical purposes within the framework of the Statistics Act, which constitutes a guarantee that this information may be used for control purposes or other purposes of direct significance to the data subject. Statistical use is, on a general basis, a purpose with a low privacy risk that is not considered incompatible with the original purpose, cf. PVF art 5 b, provided that the security measures in Article 89 no. 1 are taken care of. The fact that a statistical purpose is a purpose that on a general basis is not of an intrusive nature is also supported by the Personal Data Act § 17, which sets out exceptions from the data subject's rights, among other things for statistical purposes.

Statistics Norway has strict requirements for information security and has established systems and routines to ensure that all processing of information values in Statistics Norway takes place in accordance with legal requirements, supports overall goals and priorities and has a satisfactory degree of risk management. Measures related to information security follow from the Statistics Act §§ 7-9. Statistics Norway shall ensure confidentiality in all dissemination of statistics, is subject to a duty of confidentiality and shall implement measures to achieve a satisfactory level of security. This means, among other things, ensuring adequate access control, logging and subsequent control. Statistics Norway works continuously to strengthen information security. This involves organizational and technical measures, including regular risk and vulnerability analyzes,

According to the Privacy Ordinance, the data controller and data processor are obliged to implement appropriate technical and organizational measures to achieve a level of security that is suitable with regard to the risk, cf. Article 32 no. of necessary guarantees in accordance with the regulation to ensure the data subject's rights and freedoms, cf. the Privacy Ordinance Article 89 no. 1. Statistics Norway refers to the above measures, which are assessed in light of the purpose of processing information, the nature and risk of the information. In addition, as mentioned, all employees of Statistics Norway are subject to a statutory duty of confidentiality pursuant to section 8 of the Statistics Act. Statistics Norway believes that this safeguards guarantees in accordance with Article 89.

8. Justification that the information is necessary and

relevant (data minimization)

The statistics covered by this cost-benefit assessment currently have a data base that is obtained with different scope and level of detail, via different data capture methods and with different frequency. It is probable that various forms of selection of payment transactions could have been sufficient for some of the statistical purposes mentioned in points 1 and 2. Frequent reporting of payment transactions at the personal level will, however, both meet the needs of the mentioned statistics and enable many forms of development work. both for the development of new statistical products and methods for processing this type of data. This will not be possible with sample surveys, aggregations or less frequent data deliveries.

Statistics Norway will use payment transactions to improve the quality and timeliness of existing statistical products and to develop new statistical products. In addition, we will investigate whether transaction data can replace existing form-based data capture aimed at the business community. For these purposes, deliveries containing all payment transactions are necessary, and therefore selection or aggregation will not be sufficient.

Statistics Norway will implement measures related to data minimization after data has been received. In order to address the privacy challenges described in section 6, pseudonymisation of data will be an important measure. Among other things, connections at the personal level will be made with pseudonymous data. In addition, aggregation of data for the individual user location and payee, before further use in, for example, business cycle statistics for the business sector, will be relevant measures for data minimization.

Statistics Norway has assessed the legal bases for the extensive data collection that forms the basis for this cost-benefit assessment. These are based on specific statistical needs set out in the statistics program, study work to coordinate the data basis for various statistics and the development of new methods and statistical products.

9. Conditions of the information that imply restrictions on secondary use, if any

Payment transactions have a special commercial value for Nets. They sell the same

information as aggregated and anonymised data to the business community that uses this for insight into market development and decision support. One of their advantages is the frequency of reporting. The commercial value of data decreases over time, and will have a low commercial value after Statistics Norway's official statistics (including turnover indices) have been published.

Statistics Norway does not plan to publish data for daily transactions, nor with the topicality Nets offers its customers. However, the data material may be shared with others for research and analysis in accordance with section 14 of the Statistics Act. In order to ensure predictability for Nets, the decision on the duty to provide information may state that data may not be disclosed until 15 days after the end of the counting period. According to the Statistics Regulations, data will in any case not be disclosed until Statistics Norway has published official statistics that utilize the data base.

10. Assessment of the use of algorithms, etc. if the case concerns a decision on the reporting of new, unstructured data sources

Detailed data for each individual payment transaction via BankAxept is a new data source for Statistics Norway, and with monthly deliveries of all electronic transactions in the form of dumpers, it will be a large data source. However, the data source is structured. Statistics Norway has already received data for testing and development of official statistics for the years 2016 and 2018, and has set up systems for preparation and quality control. This assumes that the transaction data will be delivered in a more or less similar form in the future.

Statistics Norway is still working on compiling payment transactions from Nets with other data sources in connection with consumption and diet statistics. This will probably lead to some need for advanced algorithms, such as machine learning, and often in combination with simpler, deterministic systems. In order to use prepared data for the production of statistics, however, some advanced methods will be needed to be able to connect different data sources and to deal with dropouts and measurement errors.

11. Summary / recommendation

Statistics Norway believes that payment transactions as a source will improve the quality and timeliness of several of the official statistics in the statistics program. Receipt of data with a high degree of detail will cover important needs for producing consumption statistics and diet statistics with improved and necessary quality. In addition, the receipt of payment transactions will provide a basis for further development of other important statistical areas, for analyzes of the Norwegian population's consumption patterns and as a basis for tax models used in connection with the state budget.

Payment transactions via BankAxept from Nets Branch Norway are personally identifiable. They identify both the cardholder and the account owner and show all transactions made with a debit card with an indication of time and place of use. At the same time, payment transactions are peculiar both in view of the large amount of data and that this is information that does not already exist in public registers. Therefore, Statistics Norway will handle this data with extra care and in line with the measures that already apply to information security and privacy in Statistics Norway.

In addition, Statistics Norway will develop and test new methods that can protect personally identifiable information during data collection, processing and storage.

Payment transactions may also be market-sensitive for companies where BankAxept accounts for a high share of turnover, and may have a special market interest, be exchange-sensitive, or be detrimental to the company's competitive situation if the information goes astray. The commercial value of data decreases over time, and will have a low commercial value after Statistics Norway's official statistics have been published. In order to prevent the commercial value of the data from being reduced, Statistics Norway does not plan to publish data for daily transactions, nor with the actuality that Nets offers its customers.

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