Response to Targeted consultation on fair access to financial services for cancer survivors

European Mortgage Federation-European Covered Bond Council (EMF-ECBC)

26 October 2026

The European Mortgage Federation-European Covered Bond Council (EMF-ECBC) welcomes the opportunity to contribute to the European Commission's consultation on the Right to Be Forgotten (RTBF) and supports the objective of ensuring fair access to financial services for cancer survivors.

The mortgage industry recognises that it forms part of the wider value chain through which consumers access housing finance and therefore has an important role to play in supporting this objective. At the same time, it is important that the respective roles of mortgage lenders, insurance intermediaries and insurers are appropriately reflected in the design and implementation of any framework.

Based on feedback gathered from our membership, medical data is not used by mortgage lenders for the purposes of assessing a borrower's creditworthiness. Creditworthiness assessments focus on the borrower's financial circumstances and ability to meet the obligations arising from the mortgage credit agreement, in accordance with the applicable European regulatory framework.

The relevance of health data to mortgage finance arises primarily in connection with insurance products associated with a mortgage loan, notably outstanding balance insurance. In this context, lenders may handle health data insofar as they act as insurance intermediaries, but such data is collected and processed for the purposes of the insurance product and not for the assessment of mortgage creditworthiness.

Outstanding balance insurance is not a general legal requirement for obtaining mortgage credit in the EU and, in the majority of Member States, is not required by lenders, although it may be recommended as a means of protecting borrowers and their families. Furthermore, where insurance is required in connection with a mortgage credit agreement, the Mortgage Credit Directive protects the consumer's ability to obtain an equivalent policy from a provider of the customer's choice.

Nevertheless, the mortgage industry recognises that difficulties in obtaining appropriate insurance may, depending on national market practices and individual circumstances, affect the overall mortgage customer journey. The EMF-ECBC therefore recognises the importance of an effective and workable strategy.

Against this background, the EMF-ECBC supports an approach which facilitates fair access to financial services for cancer survivors, while recognising the different roles of the actors involved and the diversity of arrangements across national markets. Any approach should be clear, proportionate and workable in practice, taking appropriate account of the need to ensure the continued availability and sustainable provision of insurance cover.

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