# European Data Strategy Should Build on European Strengths

When Europe rises from Covid-19 crisis, we must build on our existing strengths: manufacturing, networks of companies and trust. Data Strategy must stem from companies’ needs and emphasise role of trust that is to be found in existing delivery and partnership networks of European companies. We must develop the whole stack of tools that help companies to map their data, provide means to put that data into use and share it with other trusted companies.

Competition law and policy should be carefully considered. As a rule, companies are willing to share data within their existing networks but regard the idea of their data ending up to their competitors highly troublesome.

Market of cloud computing needs to be carefully analysed before initiating discourse on possible regulation. The Commission is looking for its strategic assets. TIF sees low potential on replicating already existing services. We should direct our efforts to build the soft infrastructure for data sharing, which may use existing capacities and add skills, standards and legal tools[[1]](#footnote-1) that help us to build an ability to have right data at the right place, at the right time. For personal data, MyData Operators may play a key role in turning European privacy values to fluid, trustworthy and transparent data economy.

Data Spaces may carry numerous connotations – the foremost should be interoperability, APIs, standards and documentation as well as data policies and legal agreements or rulebooks – common elements that facilitate usage of certain kind of data and form basis for cross-sector interoperability. For most of the data sets storage is readily available. These Data Spaces should also include services that boost data usage.  Role of intermediaries in European Data Economy should be considered carefully. We need many intermediaries to enhance data quality and usability (e.g. anonymisation, data janitors to annotate data etc.) and help companies to establish data sharing practices (as described in SITRA Rulebook[[2]](#footnote-2)). However, we do not need the type of intermediaries that would set the rules for companies.

Interoperability of data over sector boundaries is a commendable policy objective. Interoperability is not only a technical question: data sharing schemes should have same legal DNA in order to guarantee data usability over sector boundaries. Soft-law approach is important in building legal interoperability: Existing initiatives need to be examined closely and build policies on existing foundations.

Many datasets considered consisting of non-personal data carry high probability of having personal data dimension when combined with other data (e.g. data from connected devices that is combined w/ work shift data is linkable to a natural person) We need more clarity on use of privacy-enhancing technologies and balanced data policies in order to be able to use these kinds of mixed data sets to their full extent. Here, the EDPB plays a key role; their guidance over Covid-19 applications should set a new standard in terms of clarity and usability.

To facilitate better use of personal data, especially for new purposes, we need to widen the scope of data portability to personal data processed in public registries. Furthermore, the Commission should seek to advance functioning and position of MyData-operators by setting standards and common set of requirements applicable to this kind of activity. MyData operators are likely to play an important role on providing trust and facilitating targeted flow of personal data as well providing solid basis for reliable digital identities.

Further Information:

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1. Such as TIF Model Terms for Data Sharing, <https://www.teknologiainfo.net/en/content/model-terms-technology-industries-data-sharing> [↑](#footnote-ref-1)
2. <https://data-economy.sitra.fi/ihan-project-material-rulebook> [↑](#footnote-ref-2)