

8/3/2020

## **Technology Industries of Finland Comment on Common European Data Spaces**

Technology Industries of Finland (TIF) warmly welcomes initiatives that enhance data usage and interoperability and would like to especially highlight importance of following factors:

- Personal data is to be found on many public and private datasets. In order to put this data to use, we need to have in place solutions to provide consent and better understanding on effect of privacy enhancing technologies.
- Environment that encourages use of APIs and both technical and legal standards that make sharing and using data straight-forward.
- Clear understanding on role and functioning of intermediaries

### Unlocking the potential of personal data

Due to wide scope of personal data, it is to be found in various datasets. Therefore, strict division to personal and non-personal data is hard to make. In order to be able to use data to its full potential, we need to have a horizontal personal data space. By so doing we could facilitate usage of mixed data sets containing personal data and advance technologies and solutions that facilitate usage of personal data on a trustworthy manner. On some instances, legislation could be used to enhance usability of data, especially when dealing with special categories of sensitive data.

Supporting structures: Business, Legal and Technical solutions to enhance data usage

The Commission should leverage industries' initiatives on standards, APIs as well as balanced standard legal solutions in order to build environment that encourages fair and balanced standard models for governing data. One example of these initiatives is SITRA Rulebook for Data Networks. When developing these models, the role and ongoing activities of global standards developing organisations should be leveraged to avoid duplication and encourage the development of voluntary, consensus-based and industry-driven standardisation efforts.

One important factor on usability of data are legal models that give clear and sufficiently allowing usage rights to data. These model terms or rulebooks play a crucial role in establishing balanced and workable data governance practices. Governance models that provide clear usage rights and enhance trust on managing data networks encourage investments to data solutions. Naturally, business secrets and IP rights of the companies must be respected.

### Role of intermediaries

Availability of data can be enhanced by clarifying the role of certain data intermediaries. Such intermediaries can be MyData operators, that provide scalable solutions for management of consent, digital identities and data transfers. Emergence of these operators can be enhanced by clarifying their role by means of soft and hard regulation. A key objective of regulation should be interoperability of functional elements between the operators<sup>i</sup>.

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<sup>i</sup> Please see in detail at Understanding MyData Operators at <https://mydata.org/wp-content/uploads/sites/5/2020/04/Understanding-Mydata-Operators-pages.pdf>