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The Data Act – leading the European data economy by cross-sectoral data flows and human-centricity

The momentum to enhance data-driven development with policy measures

Enabling data use is critical for economic, social and environmental development. Finland welcomes the Data Act as a key element in the EU Data Strategy, in accordance with the aim of increasing the availability of data within the European Union's single market. Given the extent to which there have been policy efforts to enhance data flows, the Data Act is a pivotal opportunity for the development of the data economy.

Finland supports the objective of increasing the availability of data which provides the whole of society with the capacity to make decisions that more closely take citizens' and businesses' interests into consideration. In Finland's view, an ambitious data policy is promoted by increasing data sharing with interoperable, decentralised data exchange solutions while taking into account the global and dynamic nature of digital business.

Finland considers it especially important to define balanced measures that enable data access and portability for businesses and individual users. Measures should also encourage data sharing based on clear terms of use and standards supporting interoperability. Both aspects arise from the untapped potential and the fact that, even if the data is accumulating in a single system, many actors have contributed to the generation of it. These actors should therefore be able to create value from the data to benefit everyone, while also respecting existing regulations, including data protection, access to documents, intellectual property and competition law.

Completing measures for data infrastructures and human centric data economy

Investments in European data infrastructures call for accompanying measures to enable data flows, supporting growth and renewal. With that in mind, it would appear important to understand data infrastructure as also encompassing software and service layers, where decentralised and automated data flows bring efficiency and reliability. Combined with soft infrastructures (e.g. interoperability, trust, data valuation, and governance frameworks for data access, control and exchange, as well as competencies) a 'full stack' European data economy emerges for policy measure considerations.

The European Union should continue to strive for the values of a human-centered data economy.[1] The fundamental rights of people must be ensured in all digital development. The General Data Protection Regulation provides individuals with a number of rights and corresponding responsibilities to organisations in the processing of personal data. These rights of the data subject, notably the right to access and transfer data, need to be strengthened. In particular, this needs to be done by empowering individuals with the actual means to control and re-use data related to them between systems and service providers.

[1] The principles for a human-centric, thriving and balanced data economy were introduced during Finland's Presidency of the Council of the European Union (2019). These principles were outlined as activities: access, share, act, trust, innovate and learn. https://api.hankeikkuna.fi/asiakirjat/2d0f4123-e651-4874-960d-5cc3fac319b6/1f6b3855-fc1d-4ea6-8636-0b8d4a1d6519/RAPORTTI_20191123084411.pdf.

Cybersecurity is also an essential part of guaranteeing the uninterrupted functioning of the data markets, social stability and citizens' privacy. Processing of data must be secure and reliable. Data security and protection by default should be grounding principles. In addition, data economy can only flourish based on transparency in data collection and use that are driving trust in digital services and transactions[2].

Key considerations in formulating a balanced Data Act:

- **Cross-sectoral data availability** achieved through a horizontal regulatory approach, maximising societal benefits with scalable sector-specific specifications.
- **Access to co-generated data** for those who have contributed to its collection as a principle, unless justified reasons apply. In particular, clear legal rights supporting access to data collected by connected devices (IoT).
- **Access to data of public interest** for critical use purposes by setting obligations and requirements (e.g. data formats) for data holders.
- **Data portability** by strengthening the individual's rights to data with accompanying actual means of controlling and re-purposing data, as well as enabling efficient data transfers between systems and services for business users (e.g. cloud services).
- A minimum viable set of **metadata** is needed to increase findability, and **structured data** for machine readability.
- **Data sharing** by clarified and balanced terms of use, as well as by creating data interoperability frameworks and standards.
- **Decentralised data flows and automated data transactions** building trust and efficiency in data exchange (e.g. data and API automation, smart contracts).
- **Data Spaces collaboration** for use cases, incentives and concerns in policies informing data sharing (e.g. investments in European data space initiatives and projects).

[2] Considering information disclosure, the EU Corporate Sustainability Reporting Directive and its application to data governance and reporting schemas (e.g. ESG). For example, data accounts as voluntary reporting practices need to be acknowledged as building corporate responsibility and accountability.

Cross-sectoral data use benefiting all parties

Data is used for creating added value and offerings in complex production and service networks as well as for decision-making in all sectors. Therefore, availability of data must be increased across sectoral boundaries.[3] Finland is strongly committed to the Commission's objectives to increase availability of data that is particularly important for the functioning of society.

Furthermore, the public and private sector often have differing needs and use purposes for data, which is why access to same data can bring value to both.[4] Finland also notes the value of accessing data for scientific research and statistical purposes of common interest. The related procedures should be as smooth and straightforward as possible with regard to, for example, the existing reporting obligations. Attention must be paid to a holistic costs-and-benefits analysis concerning making data available.

Access to data for everyone contributing to co-generation

The shortcoming of the digital single market can partly be explained by the insufficient accessibility of data. This is the case in various sectors, where broader access to data would also allow the development of products and services. For example, the formation of travel chains in the internal market for transport services would require, in addition to interoperable ticket and payment systems, third party operators to be given access to relevant data in order to provide ticket intermediation services.

By default, data should be accessible to those who take part in its co-generation, unless there is a vetted reason justifying otherwise. It is also of primary importance that data producers, i.e. companies and people whose actions or characteristics are observed in generating the data, remain fully able to manage the use of data relating to them. Those who contribute to data production should be given access to the data, and thereafter be in a position to a control and benefit from its use.[5]

Access rights and responsibilities regarding data generated by connected devices and sensors (IoT) should be clear and equal. Currently there are challenges in various sectors due to data lock-outs or uncertainties in the relationship between device manufacturers and users, as well as in the relationship with software or service providers. For example, measures in relation to the access and use of vehicle data urgently need to be addressed.

Access to data of public interest

Concerning data of public interest, it is important to identify the purposes for which the private sector would be obligated to provide data. This may be necessary for ensuring public safety or health, for example. Such data may benefit society at large, so data access could also be compulsory in specific cases. However, an appropriate assessment should be conducted before making a decision on compulsory measures. Depending on the purpose, the fees for sharing data of public interest may vary. In order to find a balance, organisations' reporting schemes and protection of individuals' rights need to be taken into account. It is also important to consider reciprocal requirements for the public sector so as to enhance the availability of data and to create mechanisms to facilitate the use of data.[6]

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[3] Taking into account, for example, the requirements and restrictions required by national security, data protection and intellectual property rights.

[4] The objectives for data access for the public interest in the Data Act need to be orchestrated with the high value data sets (EU Open Data Directive) as well as data intermediation structures (EU Data Governance Act)

[5] For example, Finland supports the obligations proposed for gatekeepers in the digital markets to promote data sharing and interoperability between different online platforms (Digital Market Act).

[6] In connection to the Data Governance Act on re-use of public sector data and The Open Data Directive on high-value data sets.

With regard to the smooth usability of data, we should avoid situations in which public authorities create data intermediation services in order to transfer data between private bodies, especially if the data is actually intended to be used to generate markets or innovation. In a B2B environment, access rights established directly between the companies themselves should be the primary tool for balancing access of data flows between rival companies.[7] Intermediation services are relevant actors within the data markets to realize the exchange of data in a trustworthy way and enabling data flows.[8]

Data portability rights with the means for individuals to re-use data

The human-centered data approach, which especially gained a place in the policy discussions during the Finnish Presidency of the Council of the European Union in 2019, calls for a set of principle level standards for the use of personal data. The Data Act offers an opportunity to enhance the General Data Protection Regulation by operationalising the right to portability of data in practice, so that data could be more easily transferred between systems and service providers. Finland strongly supports additional measures that aim at strengthening the right under Article 20 of the GDPR[9]. More consideration should also be given to fostering the creation of minimum technical interoperability requirements that interlink users in the existing systems and data exchange.

In addition to legal rights to transfer data between systems and service providers, users need the actual means to re-use data for their own benefit.[10] Measures in the Data Act should contribute to the creation of effective tools for individuals to manage their data in connection with data intermediators.[11] Personal information management solutions and transparency in data use must also fulfil the need for self-determination by empowering people to actively re-use their data.[12]

Data portability for smooth business operations and facilitating European cloud ecosystems

Finland supports the objective of free movement of data from one system or service provider to another. These transfers should be carried out with as few costs as possible and without compromising the service. Data portability should primarily be improved through service providers' voluntary measures. However, as assessments point towards existing lock-in effects,[13] obligations are also needed, for example in terms of high-level principles with technical specifications[14] clearly recognising the right to cloud service portability or binding codes of conduct (e.g. SWIPO). In addition,

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[7] Telecommunications and finance are examples of industries where data access and portability is a reality by regulation. As a result, consumers have a real choice between service providers and no additional administrative obligations have been created for public authorities to organise the data sharing or trust services relating to it.

[8] As outlined in the Data Governance Act.

[9] Obligations to provide a well-documented Application Programming Interface on a continuous basis, as well as standards ensuring data interoperability.

[10] Giving users better access and easy-to-use tools to allow re-use of their data, for example, as certificates to verify competences or roles (MyData services by Vastuu Group), or as data views with analysis services (MyPurchases views by SOK enabling customers to see their footprint or the nutritional make-up of their personal consumption, for more sustainable and healthier choices at an individual level).

[11] With reference to the Data Governance Act on data intermediators.

[12] The EU eIDAS should comply with the so-called MyData principle that aims to strengthen individuals' control of their personal data and identities when assessing the possible introduction of trust services for attributes and so called self-sovereign identity solutions. However, solutions to facilitate strong identification should not restrict the development of services outside the scope of the eIDAS regulation that strengthen citizens' control over their data in online environments, while providing them with assured anonymity, i.e. by avoiding the unnecessary linking of data to individual persons in digital services where possible.

[13] See the Commission's impact assessment in relation to the Data Act.

[14] Data in a structured, machine-readable format ported to another provider or system against specified thresholds.

the lack of awareness of these switching and portability principles, standards and practices might be part of the problem, calling for accompanying communicative efforts in practice. It is important to address data in this context covering SaaS and IaaS service layers and tools.

These legislative measures also create a 'level data playing field' that supports the competition and growth of European industries and businesses during the lifecycle of products, services or data as a whole, especially within a European cloud ecosystem with increased service provision and quality. Our promise of a functioning market and competition should guarantee the possibility to choose between service providers – for both consumers and businesses.

Metadata as a prerequisite for data use

Metadata enables people and machines to find data, which is a precondition for data use. We must keep better account of the data we collect and ensure its findability.[15] Conditions and restrictions on data use can also be communicated through metadata, which would accelerate and automate the process of concluding data access and use agreements. Findability with metadata about the existence of data sources and actors is also a prerequisite for monitoring on requirements set for data access and terms of use.

Information about data becomes even more relevant as data sharing and intermediation grow by linking or enriching data and by enabling transactions between parties. Investing in high-quality metadata also promotes the European R&D&I activities (e.g. AI research) as well as copyright infrastructure development for the discoverability of the content and services of European industries.

Data sharing by creating conditions for terms of use and interoperability

We need data sharing mechanisms in order to achieve scalable benefits from data, governed by clear conditions and terms of use. We need data sharing systems in order to achieve scalable benefits. The sharing of data cannot be based only on individual solutions between two actors, but collective solutions are needed within and across sectors.

Today, data sharing takes many forms with specific demands and challenges to be tackled in order to increase the data flows between infrastructures, entities and uses[16]. To enhance data use, unnecessary legal and technical restrictions need to be removed restricting exchange, flow, transactions on data.[17]

Sharing data does not necessarily mean that all data is available for everyone, but rather that the data use is feasible and governed by clear conditions and terms of use. Conditions on data use can be set as long as they are fair, reasonable and non-discriminatory. Finland advocates general terms as conditions to be set for data sharing.[18] Attention should be paid to consider a reasonable yield on investment by the type and purpose of the data. Furthermore, there is an emphasis on the availability of interoperability standards being open or at low marginal cost. Established conditions for data sharing require a monitoring mechanism, for example by developing reasonableness testing.

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[15] GDPR already requires organisations to keep account of their data reserves, which needs to be emphasised. We also encourage organisations to compile a data balance sheet for open communications.

[16] There are many types of data sharing: direct data exchange or provision; data flows between systems; remote use (for example in a co-use environment or calculations at the source of the data); certificate model as verified claims; encrypted data for processing by algorithms etc. The new type of technology-assisted data use calls for requirements for the data for example machine-readability. In addition, data intermediary roles in relation to data sharing can vary.

[17] By investigating the relationship between the benefits of data exchange and contractual freedom, as well as appropriate regulation on data protection and competition law.

[18] FRAND conditions and terms, as well as FAIR principles.

In practice, model contract terms and templates or rulebooks for standardised data sharing agreements support parties in contract negotiations.[19] Establishing data access rights by means of a regulation does not render agreements useless or unnecessary. On the contrary, data sharing agreements are for facilitating efficient, safe and transparent data use. These measures should particularly aim at supporting organisations in entering into data partnerships by balancing the asymmetric negotiation power due to lack of resources, especially in SMEs.

Further, to both simplify and encourage data sharing, it would be beneficial for individuals that well-known and universally recognized generic terms and conditions were developed and used widely[20].

In general, the required investments and possible compensations related to the provision of data need a more detailed assessment. It is important to note that while efficient data access and use require technical structures (e.g. APIs, software, licenses and other solutions) that involve costs, they also creates cost savings in the long term.

As data sharing proceeds within service ecosystems and data spaces, interoperability becomes an even more vital element of data use between parties and in cross-industrial and cross-sectoral collaboration. In addition to technical specifications, an interoperability framework includes harmonised data concepts building on semantic interoperability of data content.[21] Interoperability standards call for collaboration between standardisation bodies and industry, making use of design principles[22] and best practices of data sharing, in order to secure 'interoperability of interoperability frameworks' as well as openness of standards already emerging within industrial data ecosystems and data space initiatives.

Although reference to existing or possible new sector-specific data standards should be made primarily in sectoral regulations, the general principle for the eligibility and mutual recognition of audits and approvals in accordance with these standards should be aligned horizontally. The horizontal framework is needed to ensure that all operators have an equal opportunity to demonstrate that an equivalent level of requirements and performance (e.g. for interoperability or security) is met, even if different solutions to verify this were used, for example, due to sectoral differences.

Decentralised and automated data mechanisms to facilitate efficient data transactions and trust

One of the obstacles in data utilisation is ensuring trust between the parties in data transactions. These issues may be addressed by programmable systems, for example smart contracts, which can help to embody the terms of the agreements and to execute them automatically.[23] Automated data flows build digital trust and offer scaling opportunities with decentralised data solutions, but they require significant maturity from data infrastructures and capabilities. While distributed ledger technologies with smart contracts can be promising vehicles for data flows, there must remain some room for experimentation in order to maintain the willingness of companies to invest in the evolving

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[19] For example, Rulebook for data sharing (Sitra, 2021). https://www.sitra.fi/en/publications/rulebook-for-a-fair-data-economy/#download-the-rulebook. The technology industries' (Finland) model terms for data sharing are also available (subject to a fee).

[20] These could be manifested as labels (like fair trade), or as licences (like Creative Commons or open-source software). Anything that interested users would recognize, saving them the burden of having to browse through terms and conditions for each service offering or data sharing contract.

[21] In Finland, for example, an interoperability platform that consists of terminologies, code lists, data models and machine-readable specifications needed for information flows. The interoperability platform is intended for use by both the public administration and the private sector, and it is available free of charge. Data content producers are each responsible for their own data specifications and for keeping them up to date and of high quality. The key issue is the consistency and re-use of data specifications describing data content as well as an interoperability method for shared descriptions as core concepts, core classes and code lists that are openly available online.

[22] See, for example, Design Principles for Data Spaces (Open DEI).

[23] Data transactions or transferring tokens, verified claims, proofs and other role identifiers based on data.

solutions.[24] Moreover, consumer protection and data transparency including legal design, as well as digital identity regulation with identification solutions,[25] are critical aspects that should be taken into account in the development. Building trust on data exchange and bringing digital services closer to the user's context should be part of the primary aims.

To avoid bureaucratic structures and procedures that cause inflexibility and slow down data access and flows, unnecessary obstacles to digitalisation need to be removed, such as requirements for paper documents in situations where they can be replaced with structured digital ones.

Data Spaces leveraging data collaboration and informing policy making

Real-life collaboration and experiments within impactful use cases are the drivers for enhancing use of data within and cross sectors. European data space initiatives with sufficient funding and networking opportunities are crucial elements of the European data economy. The Data Act regulation and the Data Space initiatives should be connected through a dialogue during the negotiation process. This is necessary to avoid fragmentation of data practices that might also jeopardise data interoperability and flows.[26] Moreover, it is critical to ensure coherence with the Data Governance Act defining Data Spaces.[27]

Promising ecosystems and common data sharing practices as sector-specific data spaces (e.g. mobility, health, environment, agrifood) are emerging today.[28] European data spaces have the potential to form hubs and ecosystems of actors connecting also sectoral data initiatives. This means collaboration across industries and sectors to generate common elements ensuring interoperability (e.g. a toolbox for technical architectures, standard reference, identity solutions). Furthermore, sector-related use cases offer us valuable information to draw lessons from. This means collaboration between domain specific, regional and horizontal data spaces to inform data legislation, to envision the future and to agree on common elements and interoperability frameworks between data spaces as systemic thinking.

Ultimately, data spaces can also support us in striving for sustainability. For example, production and consumption data may be utilised in applications for sustainable development. These could include data on climate impacts and emission calculations that have the potential to assist individuals in making informed choices on their consumption. Same data can be used to offer transparent and fair emission evaluations and measures, for example in the entire agrifood system. Information about climate impacts can be compiled by applications for individuals and business users, where emission information can, in real-time, be gathered from production processes and derived from retail e-receipts or other financial data. There are on-going projects that demonsrate how data spaces can be transformed to drive sustainability with flows of production and transaction data cross-sectors.[29]

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[24] In Finland, smart contract solutions are already in use, for example in loan application processes and housing transactions.

[25] European eIDAS regulation and solutions (toolbox, data wallet) considering technology development (e.g. SSI). For example: the Findy Cooperative verifiable data network to transfer verified claims ('the fact wallet') between services. There are also interesting projects like the Creative passport and the development of the copyright infrastructure in Finland.

[26] In Finland, the regulation on the secondary use of health and social data was accompanied by development initiatives on permissions (FinData) and co-innovation communities (Innokylä) that also build ground for Health Data Space (TEHDAS by Sitra).

[27] The State of Data Spaces study identifies these activities and entities (to be published in November).

[28] For example, horizontal data spaces (Gaia-X, International Data Space Association, Team Data Spaces) and sectoral ones (TEHDAS, Digital Self-Determination network initiative for health or Mobility Data Space for mobility).

[29] Especially notable is the work of the Nordic Smart Government, the Nordic Institute for Interoperability Solutions and the Finnish Real-time Economy initiatives or projects.

Databases and IPR infrastructures for an advanced data economy

Intellectual property rights (IPR) play an important role for a functioning data economy, in the implementation of effective data access and sharing mechanisms. IP and copyright infrastructures need to meet the demands of advanced digital development. In the first place, existence of transparent information on IP rights and terms of use can contribute to this aim. There is also a need for a clear and transparent IP policy for the re-use of data of the public sector.

Protection of databases forms a critical part of information infrastructures from an IP perspective. An important benefit of database protection is to ensure that the data is kept safe from misrepresentation. Finland considers database protection to continue to be a relevant form of protection, especially in sectors where the commercial utilisation of databases is based on exclusive rights. However, changes brought about by digitalisation necessitate the revision of the database regulation. It would be appropriate to state explicitly that it does not prevent the imposition of obligations on the disclosure of information laid down in national or European Union law on the holder of the database.[30]

Global data collaboration aspects

The goal of achieving a universally level playing field with a clear legal basis, as outlined in the EU Data Strategy, also requires closer collaboration with intergovernmental organisations. To establish common grounds for balanced development of a secure, competitive, responsible and participatory global data economy, we need collaboration at both the policy and practice levels.[31]

Finland stresses that the European Union's strategic autonomy and competitiveness in the global data economy is based on its own strengths, fair competition and cooperation within the global economy. Issues identified in connection with data transfers to third countries need reflection on interaction based on authority with regard to the data protection regulation.

The Data Act – meeting the needs of a balanced data economy for the future

A data economy based on trustworthy operational solutions and an enabling regulatory environment with legal measures concerning efficient and innovative data use creates balanced growth for the long term. A horizontal approach in the Data Act with the objectives of cross-sector data use and user-centric development merits support. European companies and citizens must be able to trust the data environments. They must have the opportunity to access and manage their data and the data flows between service providers and systems in open and competitive markets. This calls for measures defining access rights, minimum metadata requirements, enhancing data sharing and interoperability, while enabling advanced technological solutions to process data efficiently.

The measures must be flexible enough to take into account the rapid development and spread of digital technologies as well as emerging standards in data use. Creating clear and fair terms for data use improves the capacity of businesses, especially SMEs, to take action in the data economy that makes an important contribution towards enriched data-enabled growth.

The regulatory environment in data should encourage data-based innovations, businesses and services, as well as support the development and deployment of new technologies. We emphasise

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[30] Sui generis right does not preclude the possibility of introducing a national provision mandating a rightholder to provide information, for example regarding a traffic control system.

[31] For example, the OECD project Towards General Principles for Enhancing Access to and Sharing of Data aims at removing barriers to data sharing with a wide range of policy measures, from education to investment. Furthermore, the OECD Guidelines on the Protection of Privacy and Transborder Flows of Personal Data, including, for example, the individual participation principle, was adopted in 1980. WEF-Finland cooperation: Empowered human-centric data economy (WEF, 2021).

an approach in which proportionate and clear measures are of primary importance.[32] First, strengthening the existing regulation with additional, well-defined horizontal legislation should be a priority. At the same time, rapid technological development requires flexibility from regulation in order to address a wide range of technological solutions that may emerge later.

The legislation would need to focus on real obstacles in data access and use, instead of creating an unnecessary regulatory burden on businesses, consumers or administrators. The scope and activities of any new regulation must be defined clearly so that entities can understand the requirements to be applied in a real-life context, thus creating a solid legal foundation and investment certainty for the data economy.

We emphasise a technologically neutral approach. For example, smart contracts, cloud services and the Internet of Things, as the technological themes addressed in the Data Act, should be seen more broadly as internet-based general use data mechanisms, where access and portability rights are necessary elements to enable data flows.

When creating legislation, it is important that all the relevant actors consider the resources, costs, benefits and impacts (e.g. technical measures for data access as machine-readable data and APIs) of the measures.

Due to the linkages of the Data Act proposal with other existing regulations and with initiatives in the making, and due to the interdependence between them, measures must be assessed as a whole from the perspective of the clarity and functioning of the EU legislation. It is essential that coherence is maintained without overlapping and contradicting measures.

Finland also considers it important that the data regulation allows a necessary margin for implementation at the national level within existing well-functioning structures and practices with a legal basis.[33] In addition, as the roles in the public sector vary in different EU Member States, the regulatory framework should enable mutual recognition in the ways in which data transfer services and operating models are solved. In addition, implementation measures can be leveraged regarding the Member State's technical development phase, regulatory environment and structures for decentralised data access and use as best practices and benchmarks to others.

These also need to take into account the national characteristics, legal base and operating best practices in the availability of data that go beyond the common level of policy measures.[34]

A decentralised data environment enables the building of trust in digital solutions. This creates a growth platform for the data economy, just as digitalisation of services has already changed the time and place linkage of service provision. Transition from closed proprietary data reserves towards decentralised data flows, self-sovereignty models and data spaces calls for ambitious measures to be set collectively in the Data Act. In order to guarantee trust in digital transformation, the profound differences between non-personal and personal data must be taken into account. At the same time, we must strive to make better use of data by combining different data types and sources. The Data Act gives us an opportunity to define the measures needed to enable better use of data held by

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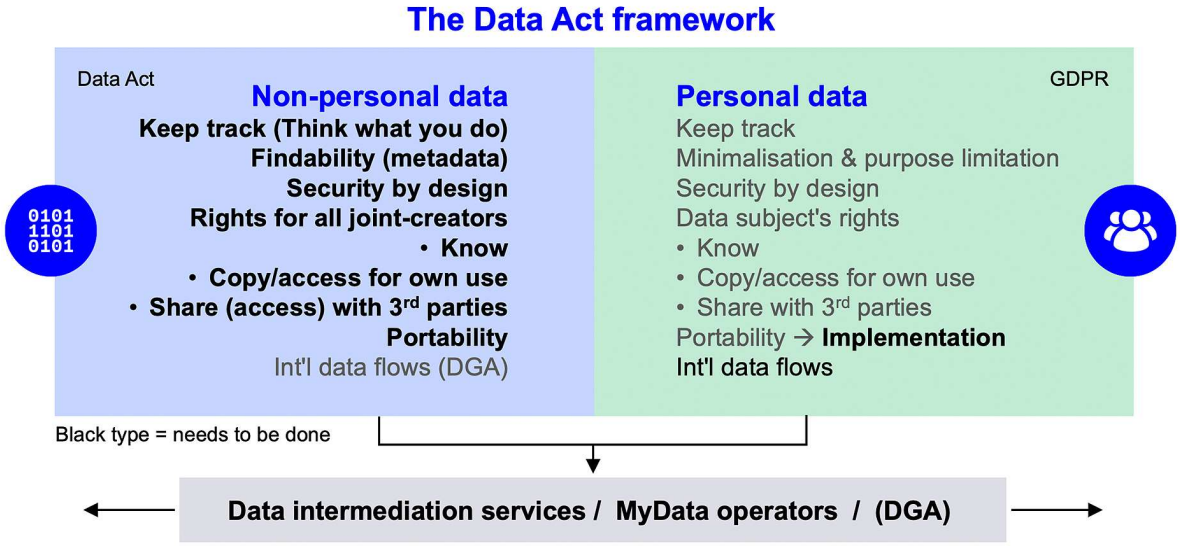
[32] The legal means must be proportionate to the need or the problem to be solved, and especially concerned with scaling from general principles (e.g. data access) to specifically defined legally obligated measures (e.g. technical standards or codes of conduct). These also refer to structural means especially for data sharing (e.g. data security, reporting requirements, time limits, proportionality for requests), financial compensations (e.g. criteria for charges payable for data use) and mediation structures (e.g. contract models, dispute resolution mechanisms).

[33] For example, national legislation on the openness of official documents can be taken into account and national measures that clarify data management and promote interoperability of data can be adopted.

[34] As an example, the Finnish Act on the Openness of Government Activities regarding an individual's right to access public documents or the Transport Service Act with requirements for data access and API interfaces of mobility data (e.g timetables, routes, ticketing).

organisations, orchestrated with other relevant existing legislation for the development of a balanced data economy (see Figure).



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