

# **THE EUROPEAN WAY TO DATA ECONOMY**

## **Taking Stock and Looking Ahead**

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### **ABSTRACT**

*Digital technologies are transforming the economy and society, affecting all sectors of activity and the daily lives of all European citizens and businesses. Data is at the centre of this transformation and more is to come. Given the increasing volume of non-personal industrial data and public data in Europe, combined with technological change in how the data is stored and processed, being a potential source of growth and innovation, a regulatory framework and an ecosystem must be guaranteed in accordance with European values, fundamental rights and rules creating trust and benefits for all Europeans.*

*Starting from an overview on the data economy in the EU, this policy brief aims to take stock of the European strategy for data, published last February by the Commission as a part of its digital package to create a «single market for data that will boost Europe’s global competitiveness and data sovereignty». A specific focus is placed on the challenge of ensuring a European leadership on industrial data, recently reaffirmed by Ursula von der Leyen’s SOTEU, also with the proposal of building a European cloud based on the Gaia-X initiative as part of NextGenerationEU. The brief also makes a reference to the future data initiatives, that will include a legislative framework on data governance (expected by the end of this year) and a legislative proposal for a Data Act (scheduled for 2021).*

## 1. The data economy in the European Union

With the growing focus on the Internet and the use of mobile devices, where objects communicate with each other using highly sophisticated technologies and a variety of sensors allow us to measure and monitor virtually everything, we are witnessing the generation of an unprecedented amount of data. For example, according to some estimates, in 2022, the global consumer IP data traffic is expected to reach 333 exabytes per month at a 27% CAGR in the period 2017-2022<sup>1</sup>. Data is the lifeblood of the economy and **data-driven innovation** is a key pillar in 21st century development. The smart use of data can create new opportunities for economic growth, especially for SMEs, enabling the development of artificial intelligence applications, that can help us address various societal challenges, from medical care to the fight against climate change.

The importance of data and information for economic development and wellbeing is clearly undeniable and healthcare is undoubtedly the sector in which this is becoming more evident. Although the **Covid-19 experience** has revealed the resilience of the Union, it has revealed the existing gaps and difficulties in collecting, analysing and sharing data in times of emergency. While the role played by data applications is clear, e.g. in matching existing molecules with genomic features of the virus, it is evident that a more effective and quick deployment of tools will be required in the near future. The Commission's decision to prioritise the creation of the Health Data Space (Q4 2021) over other sectors will be considered in this light.

Moreover, **data management** undoubtedly plays a central role in supporting the decision-making process in cybersecurity issues. However, data should be characterized by high standards of quality and interoperability. For this reason, it is important to develop a legislative framework based on the values of transparency, interoperability and accessibility. The importance of a network for mutual assistance and prevention of cyber-attacks and also the need for a EU cybersecurity certification framework has been emphasized. Consequently, the will to innovate the entire cybersecurity sector has been confirmed by the Commission that will put on the table in mid-December 2020 a new cybersecurity strategy and a proposal for the revision of the NIS Directive.

Nowadays, most economic activity depends on the sharing of and the use of data, and in the future this trend will continue to increase with a huge economic impact. According to the **IDC European Data Market Monitoring Tool** (2020), which measures the overall impact of the Data market<sup>2</sup> on the economy as a whole, the value of the Data Economy exceeded the threshold of € 300 billion in 2019 for the EU-27 with a growth of 7.7% over the previous year. If the UK is also included, the value amounted to € 406 billion in 2019. In relative terms, the impact of Data Economy on the EU-27 GDP is 2.6%. Moreover, according to the baseline scenario, that is considered the most likely,

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<sup>1</sup> <https://www.statista.com/statistics/267202/global-data-volume-of-consumer-ip-traffic/> (last access: 09.10.2020)

<sup>2</sup> The Data market is the marketplace where digital data is exchanged as "products" or "services" as a result of the elaboration of raw data.

the EU-27 Data Economy will grow faster in the next years, reaching a value of € 550 billion in 2025 at a 9.2% CAGR in the period 2019-2025 with a 4% impact on GDP.

The positive trend in the growth of the Data Economy is also confirmed by the **Data Market value**, that reached € 58 billion in 2019 for the EU-27, up by 5% from 2018, and is expected to amount to approximately € 80 billion in 2025 with a CAGR of 6% in the period 2019-2025. Unfortunately, the lack of adequate skills risks becoming an important barrier to development in the data industry and the adoption of data-driven innovation. According to the latest estimates, the number of data professionals in the EU-27 amounted to 6 million in 2019, corresponding to 3.3% of the total workforce, with an increase of 6% over the previous year. However, the EDM Monitoring Tool continues to register an imbalance between the demand and the supply of data skills in Europe as the estimated gap showed approximately 399,000 unfilled positions in the EU-27, corresponding to 6.2% of total demand. However, this gap is expected to grow even more, reaching 759,000 units in 2025, 8.2% of total skills demand.

Finally, as far as supply and demand are concerned, in 2019, data suppliers were estimated at more than 140,000 units in the EU-27, a year-on-year growth of 2.4%. Data users, instead, remained stable in 2019, amounting to 535,000 units, registering a growth of 0.6% over the previous year.

## 2. The European regulatory framework. The European Strategy for Data

Three main pieces of legislation currently provide the legislative framework for data - the General Data Protection Regulation (Reg. 2016/679), the Regulation on the free flow of non-personal data (Reg. 2018/1807) and the Open Data Directive (Directive 2019/1024). To ensure a coherent and comprehensive approach, a set of actions has already been established by the von der Leyen Commission, starting from the European Strategy for Data (February 2020) and will be complemented by i.a. the regulation on data governance (Q4 2020) and the Data Act (Q3 2021) to ensure the safe and effective sharing and reusing of data.

Specifically, on 19 February 2020, the European Commission presented the Communication "**Shaping Europe's digital future**", which explains the European Digital Strategy. It identifies as its macro-objectives: 1) the implementation of technologies at the service of individuals, underlining the importance of investing in digital competences for all Europeans, protecting citizens from cyber threats (hacking, ransomware, identity theft), ensuring that AI is developed respecting people's rights and earning their trust, accelerating the roll-out of ultra-fast broadband for homes, schools and hospitals throughout the EU and expanding Europe's super-computing capacity to develop innovative solutions for medicine, transport and the environment; 2) the creation of a fair and competitive digital economy, proposing a Digital Services Act to strengthen the responsibility of online platforms and clarify rules for online services, underlining the necessity to increase access to high-quality data (ensuring that personal and sensitive data is safeguarded), enabling a vibrant

community of innovative and fast-growing start-ups and SMEs to access finance and to expand and ensure a fair competition in Europe; 3) the realization of an open, democratic and sustainable society, highlighting the contribution of technology to help Europe become climate-neutral by 2050, of the importance to empower citizens with better control and protection of their data, creating a European health data space to foster targeted research, diagnosis and treatment and fight disinformation online and foster diverse and reliable media content.

On the same date, the European Commission published the Data Strategy and the White Paper on Artificial Intelligence which are the first pillars of the new digital strategy of the Commission. Considering that digital technologies have transformed the economy and society, affecting all sectors of activity and the daily lives of all Europeans and that data is at the centre of this transformation, the Communication *“A European strategy for data”* outlines a strategy for policy measures and investments to enable the data economy for the coming five years. This Communication presents a European data strategy aimed at making the EU the most attractive, secure and dynamic data-agile economy in the world – empowering Europe with data to improve decisions and better the lives of all of its citizens.

The Commission is convinced that businesses and the public sector in the EU can be empowered through the use of data to make better decisions, thus, creating a single European data space – a genuine single market for data, open to data from across the world – where personal as well as non-personal data, including sensitive business data, is secure and businesses also have easy access to an almost infinite amount of high-quality industrial data, boosting growth and creating value, while minimising the human carbon and environmental footprint.

To achieve this goal, several critical issues need to be overcome concerning: a) **the availability of data** - considering that the value of data lies in its use and re-use and currently there is not enough data available for innovative re-use, the strategy underlines the importance to guarantee government-to-business (G2B) data sharing (to ensure that data generated by the public sector, as well as the value created, should be available for the common good by ensuring, including through preferential access, that this data is used by researchers, other public institutions, SMEs or start-ups), business-to-business (B2B) data-sharing (removing the current lack of economic incentives, of trust between economic operators that the data will be used in line with contractual agreements, imbalances in negotiating power, the fear of misappropriation of the data by third parties, and a lack of legal clarity on who can do what with the data), business-to-government (B2G) data sharing (to improve evidence-driven policy-making and public services such as mobility management or enhancing the scope and timeliness of official statistics) and sharing of data between public authorities (to improve policy-making and public services, but also to reduce the administrative burden on companies operating in the Single Market); b) **imbalances in market power**, in the provision of cloud services and data infrastructures, but also in relation to access to and use of data; c) **data interoperability and quality**, encouraging the application of standard and shared compatible formats and protocols for gathering and processing data from different sources in a coherent and interoperable manner across sectors and vertical markets; d) **data governance**,

to further reinforce the governance of data use in society and the economy; e) **data infrastructures and technologies**, underlining several critical issues on both the supply and demand side of cloud as EU-based cloud providers only have a small share of the cloud market with an insufficient visibility, and service providers operating in the EU may also be subject to legislation of third countries (with the risk that EU citizen and business data may be accessed by third country jurisdictions that are in contradiction with the EU's data protection framework). As well, there is a low cloud uptake in Europe and European businesses often experience problems with multi-cloud interoperability (in particular data portability); f) **empowering individuals to exercise their rights**, underlining that even if individuals value the high level of protection granted by the GDPR and ePrivacy legislation, they suffer from the absence of technical tools and standards that make the exercise of their rights simple and not overly burdensome; g) **skills and data literacy**, highlighting that general data literacy in the workforce and across the population is relatively low with gaps that need to be addressed to master the challenges of the data economy and society; h) **cybersecurity**.

Considering these issues, the Commission has outlined a strategy focused on **four pillars and several key actions**: 1) **a cross-sectoral governance framework for data access and use**. Key actions: a) cross-sectoral (or horizontal) measures for data access and use establishing a legislative framework for the governance of common European data spaces (Q4 2020) to strengthen the governance mechanisms at EU and MS level relevant for cross-sector data use and for data use in the common sectoral data spaces, involving both private and public players, facilitating decisions on which data can be used, and how and by whom for scientific research purposes compliant with the GDPR and making it easier for individuals to allow the use of the data they generate for the public good, if they so wish ('data altruism'), in compliance with the GDPR; b) starting the procedure for the adoption of an implementing act on high-value data sets (Q1 2021) under the Open Data Directive, making these data sets available across the EU for free, in machine-readable format and through standardised Application Programming Interfaces (APIs); c) the adoption of a Data Act (2021); d) analysis of the importance of data in the digital economy (e.g. through the Observatory of the Online Platform Economy), and review of the existing policy framework under the Digital Services Act package (Q4 2020); 2) **enablers, involving investments** in data and strengthening Europe's capabilities and infrastructures for hosting, processing and using data, interoperability. Key actions: a) invest in a High Impact project on European data spaces; b) sign Memoranda of Understanding with MSs on cloud federation, Q3 2020; c) launch a European cloud service marketplace, integrating the full stack of cloud service offering, Q4 2022; d) create an EU (self-)regulatory cloud rulebook, Q2 2022; 3) **competences**, empowering individuals, investing in skills and in SMEs. Key action: explore enhancing the portability right for individuals under Article 20 of the GDPR giving them more control over who can access and use machine-generated data (possibly as part of the Data Act in 2021); 4) **common European data spaces** in strategic sectors and domains of public interest. The Commission will promote the development of common European data spaces in strategic economic sectors - Industry (manufacturing), the Green Deal, Mobility, Health, Finance, Energy, Agriculture, Public Administrations, and Skills. Key action: create

a framework to measure data flows and estimate their economic value within Europe, as well as between Europe and the rest of the world, Q4 2021.

The European Strategy for data was subject to **public consultation** until 31 May 2020. This online consultation is part of a broader stakeholder consultation that will contribute to the preparation of several data initiatives including a legislative framework on the common European data spaces, expected in 2020, and an implementing act on a list of high-value datasets, expected in 2021. On 24 July 2020, the Commission published a **summary report** taking stock of the contributions and presenting their preliminary trends. In total, 806 contributions were received - 338 from a company or business organisation/association, 201 from citizens (all EU citizens), 98 from academic / research institutions, and 57 from public authorities. Consumers were represented by 7 respondents and non-governmental organisations (including 2 environmental organisations) by 54 respondents.

The online consultation involved general questions on the data strategy (section 1), specific questions on data governance (section 2.1) - including standardisation, secondary use of data, data donation and data intermediaries -, specific questions on high-value datasets (section 2.2), and specific questions on the (self-/co-) regulatory context of cloud computing (section 2.3).

For the general questions, there is consensus on the need to increase data availability, make it easier for individuals to grant access to their existing data, in line with the GDPR, remove difficulties in using data from other companies, and make major investments in technologies and infrastructures that enhance data access and use, while giving individuals, as well as public and private organisations, full control over the data they generate.

Where governance is concerned, there is a general consensus that standardisation is necessary to improve interoperability and ultimately data re-use across sectors. As for making a broader range of sensitive data available for R&I purposes for public interest, the report highlights the importance that public authorities place on the anonymity of specific data for concrete use-cases and the clarification of the legal rules. For “data altruism”, instead, the lack of sufficient tools and mechanisms to ‘donate’ their data was underlined. Regarding the specific questions on high-value datasets, the respondents consider the establishment of a list of high-value datasets, to be made available free of charge, without restrictions and via application programme interfaces (APIs). This is seen a good way to ensure that public sector data has a positive impact on the EU’s economy and society, as well as providing funding to enhance the availability and re-use of high-value datasets across Europe, especially those to improve the quality (e.g. machine-readability) and interoperability of the data /metadata and, to a lesser extent, funding for engaging with re-users. As for the regulatory context of cloud computing, the stakeholders answered that the cloud market currently offers the technological solutions that businesses need to grow and innovate, even if a significant percentage of respondents underlined the existence of problems in cloud market functioning, of barriers (security, technical and economic/cost barriers), and the idea that security concerns are the most prominent risk for the future.

To set up the regulation on data spaces, on 2 July 2020, the European Commission published an **Inception Impact Assessment** to inform citizens and stakeholders about the Commission's plans so as to allow them to provide feedback. This document defines objectives and policy options and identifies likely economic, social and environmental impacts, and also likely impacts on fundamental rights and simplification and/or administrative burdens. The adoption of the initiative is expected in Q4 2020.

Member States expressed their opinion on the Commission's strategy in the conclusions adopted on 9 June 2020 by the Council and on 2 October 2020 by the European Council. The **conclusions adopted on 9 June by the Council**, specifically, recognising the importance of the data economy as a key enabler for Europe to prosper in the digital age, underline the need to develop a human-centred European data economy in accordance with common EU values, human rights and fundamental freedoms, founded on the interests of European citizens and businesses, and in compliance with privacy and data protection rights, competition law and intellectual property rights. They also stress that individuals, employees and companies in Europe should retain control over their data, based on secure data infrastructures and resilient, trustable value chains, while preserving the EU principle of openness vis à vis third countries and the importance to ensure the availability of adequate infrastructures. This should strengthen Europe's autonomy and place Europe as the best place in the world for sharing, protecting, storing and using data.

The Council has specifically encouraged the Commission to: 1) facilitate the emergence of new data-driven ecosystems; 2) present concrete proposals on data governance and to encourage the development of common European data spaces for strategic sectors of the industry and domains of public interest (including health, environment, public administration, manufacturing, agriculture, energy, mobility, financial services and skills) based on a joint effort between the public and the private sector with the aim to deliver high quality data by all parties involved; 3) initiate discussions on the modalities of ensuring fair access to and use of privately held data, including promoting data sharing arrangements based on fair, transparent, reasonable, proportionate and non-discriminatory conditions; 4) ensure trustable, safe and secure European cloud services and high performance computation capacity usable by the MSs on a voluntary basis; 5) guarantee high capacity connectivity infrastructures, including submarine cables, connecting mainland Europe, islands and outermost regions, to effectively and efficiently build up such a federation; 6) ensure, where necessary through new proposals, that cloud services provided in Europe comply with key interoperability, portability, and security requirements, inter alia, to guarantee that there is no vendor lock-in and balanced, fair and transparent contractual conditions for the access of all market players to cloud infrastructure and cloud services; 7) speed up the delivery of a coherent framework around the applicable rules and self-regulation for cloud services, in the form of a 'cloud rulebook', to increase clarity and to facilitate compliance.

The **conclusions adopted by the European Council** on 2 October 2020, instead, reaffirm the appreciation of the Council for the European Strategy for Data, which supports the EU's global digital ambitions to build a true European competitive data economy, while ensuring European

values and a high level of data security, data protection, and privacy, and stress the need to make high-quality data more readily available and to promote and enable better sharing and pooling of data, as well as interoperability. The European Council welcomes the creation of common European data spaces in strategic sectors, underlining the importance of prioritising the health data space, which should be set up by the end of 2021. The European Council also highlights the importance of establishing trustable, safe and secure European cloud services in order to ensure that European data can be stored and processed in Europe, in compliance with European rules and standards, and welcomes the concept of an EU federated cloud infrastructure inviting the Commission to take this work forward swiftly.

On 15 October 2020 the 27 EU Member States signed a **Joint Declaration** on “*Building the next generation cloud for businesses and the public sector in the EU*”, agreeing to work together towards deploying resilient and competitive cloud infrastructure and services across Europe. Member States recognised the need for additional investment, enhanced synergies across national initiatives and a coordinated strategy to lead the cloud uptake in the private and public sectors across Europe. In particular, as agreed in the Declaration, the Member States’ joint actions will focus on: 1) combining private, national and EU investment in deploying competitive, green and secure cloud infrastructures and services. This will mean pursuing the next steps together with industry and experts to shape the *European Alliance on Industrial Data and Cloud*, be launched by the end of the year; 2) defining a common European approach on federating cloud capacities, by working towards one set of joint technical solutions and policy norms in order to foster pan-European interoperable EU cloud services; 3) driving the take-up of more secure, interoperable and energy-efficient data centres and cloud services in particular for small and medium enterprises, start-ups and the public sector.

### 3. The European debate on digital sovereignty and the Gaia-X launch

From the end of 2019, the upsurge of nationalism and protectionism at the European political level has also spread to the digital environment. As shown by the approval of the GDPR, there is growing concern among EU countries on the importance of data and on the risks that may emerge from an excessive dependence on foreign technology. This has recently led to the proposal of the European “**Gaia-X**” cloud project, a federated data infrastructure which would allow for the management, access and control of data belonging to EU citizens and businesses. With the worldwide market for new digital technologies expected to reach €2.2 trillion by 2025, indicators highlight that the EU is lagging behind in the global race for new technologies, digital services and AI, with the geographical distribution of major high-tech platforms showing a significant concentration in the US and Asian (mainly Chinese) markets.

Control over personal data, and the profit deriving from it, have made the provision of cloud services the main issue of the debate on “**digital sovereignty**”. The market for cloud storage, which is expected to overtake device storage by 2020, has been in continuous expansion since 2015 and

is forecasted to produce more than \$50 billion in revenues by 2025. Therefore, EU policy-makers have begun developing digital autonomy strategies to counter the current trend whereby European businesses and public administrations are highly dependent on services imported from US or Chinese operators.

The opportunity for Europe to act independently in the digital world has become central to EU political and economic debates. The concern for the potential lack of privacy and absence of data protection for personal information collected in foreign providers, adds to the growing concern on the interpretation of the **US Cloud Act**. The latter is believed to entitle the American administration to further intervention tools, such as the power to take control of data collected in overseas branches of US operators, regardless of the national legislation in force in countries where they are located.

Together with some of their leading high-tech firms, **France and Germany** in response have therefore promoted the creation of the EU data infrastructure “Gaia X” to facilitate a secure pan-European data collection, data processing and data sharing mechanism. The complex nature of these technologies and their continuous development, have complicated this geo-political and technological debate, which also includes issues regarding the optimisation of data management, the redistribution of personal and non-personal information in several data centres, and the adoption of competition and regulatory tools ensuring transparency and trust.

The persisting gaps in European experiences and investments (R&D) have guaranteed that the US providers hold a better quality in services, speed, usability, as well as lower costs due to the global scale of their investments. “Gaia-X”, instead, is planned to involve a new pan-European platform pooling together different cloud service providers. The project, which involves **22 firms** from both France and Germany and officially registered as a non-profit organisation (“GAIA-X AISBL”, *association internationale sans but lucratif*) on 15 September 2020, aims to create an environment in which EU Cloud Solution Providers (CSPs), High Performance Computing (HPC), and specific clouds in edge computing systems, can share and store information under European data protection standards. The development of these services will follow the principles of the Security by Design, the Privacy by Design and, will follow the two self-regulatory Codes of Conduct on data portability and cloud switching on ‘Infrastructure as a service’ and ‘Software as a service’ portability, to allow smaller companies and new market entrants to compete.

The platform will mainly operate in the areas concerning the creation of trust mechanisms that guarantee the identities of sources and recipients, access and usage rights, and an overall harmonisation of existing standards in order to allow for interoperability of infrastructures, applications and data. Furthermore, it will intervene in the provision of data through federal catalogues and in the establishment of compulsory EU-wide certification and standard schemes to support suppliers in offering safe and compatible services.

More than **300 firms have been involved up to now**, including major US cloud providers, as non-European firms can also enter the scheme if they accept the standards in line with EU values. This

is to promote a level playing field open to all who accept the common principles, without encountering market barriers or protectionist issues. As well, according to a Mlex research, the main German firms do not intend to interrupt their provisions from US providers, but rather opt for a diversification of services in a multi-cloud perspective and for the strengthening of the interoperability and inter-exchangeability features. Therefore, the intent of the European founders of “Gaia X” is to establish general rules and frameworks for integration into Gaia X ecosystem and, at the same time, to exploit the skills and the experience of non-European players. The scheme focuses on strategic interdependence through the creation of partnerships with countries that share common values and the search for a possible worldwide consensus on global Internet principles.

The Commission also plans to integrate this platform with investments in the rest of the cloud infrastructure – from computing to software - to improve the European supply of “cloud and data infrastructure”. Indeed, the Commission considers the cloud infrastructure essential to guarantee sovereignty for the future, as well as to create a more dynamic market for "data infrastructure provision", that includes Infrastructure as a Service (IaaS), Platform as a Service (PaaS) and Software as a Service (SaaS).

In order to do this, the Commission will pool funds from different resources. The **Recovery Fund** should allocate up to 20% (€130 billion) to digital, an initial injection towards building a solid European data infrastructure, made up of cloud services, platform software and skills development. The Commission foresees €2 billion from the Digital Europe Programme, from Horizon Europe and the Connecting Europe Facility, specifically earmarked for common data spaces and cloud and data infrastructures. They would like the Member States to add at least the same amount and invite the private sector to put in the same or more than the mentioned public resources, creating a total funding of €10 billion.

## Conclusions

To achieve a successful digital transformation for the economy and society, Europe should seize on the opportunity to capture, store and takes advantage of available data. This means developing new technologies and infrastructures, with a clear legal framework and the supply of the right skills, and the final goal of ensuring that all Europeans may profit from the potential that data may provide for our economies and societies.

We have identified 4 main points as key aspects to be considered while assessing the current EU data scenarios: 1) interoperability, as a powerful tool to fight fragmentation, both within EU MSs and at the EU level; 2) co-opetition, i.e. the need to strike a balance between competition and cooperation when it comes to data sharing and governance; 3) the importance of encouraging the development of a new set of skills for workers, technicians and young people entering the labour market; 4) the need to develop a framework in which European Digital Sovereignty could be

effectively delivered, both in terms of infrastructures and new technologies, taking into account the importance of investments and international competition.

Data management undoubtedly plays a central role in supporting the decision-making process. Indeed, data should be characterized by high standards of quality and interoperability. Moreover, a framework enabling the safe and effective sharing and reusing of data is missing in Europe. For these reasons, it is important to develop a legislative framework based on the values of transparency, interoperability and accessibility and a network for mutual assistance. Another key topic here regards the prevention of cyber-attacks based on an EU cybersecurity certification framework. Consequently, the will to innovate the entire cybersecurity sector has been confirmed by the Commission, that will put on the table in mid-December 2020 a new cybersecurity strategy and a proposal for the revision of the NIS Directive.

Moreover, in considering the importance of increasing clarity over terms of use and reuse, and authorised actors and authorities in charge of enforcement and monitoring compliance, the Commission plans that this be included within the framework of the Data Act. Conditions for donation of data will be specified as well, whether they are provided by companies, associations or the public sector. Rules to be applied to intermediaries in facilitating the sharing, mainly between private actors, should be clearly determined in order to create a secure and clear legal framework. A framework for the exploitation of data concerning competition rules, market fairness and asymmetries in the exploitation and use of data will also be taken into account. This will mainly be done through the DSA package (Q4 2020) and also partially by the Data Act.