

## **Vodafone Comments**

### **Overview**

Vodafone welcome the publication of the European Commission Roadmap Inception Impact Assessment on the legislative framework for the governance of common European data spaces. As set out in our response to the EU Data Strategy, Vodafone wholeheartedly supports the objective of the European Commission to encourage data sharing and reuse and thereby unlock the latent value of data. Our response went on to highlight our conditional support for the concept of designating a set of common European data spaces and stressed the importance of clear guidance from the Commission on data governance.

Vodafone commissioned Deloitte to model the economic benefits of B2B data sharing in a number of industry sectors, finding that the sharing of machine-generated non-personal data would add €1.4 tn in economic value to the EU economy by the year 2027.

However, today of a lack of guidance and best practices across Europe on end to end data management is holding back this potential. As such, European business are reliant on (primarily US based) service providers to develop and maintain the data assets necessary to conduct big data analytics. Clear European guidance on end to end data management, could help define standards and best practices, encourage knowledge sharing, thereby allowing European start-ups and firms to be able to compete in this space on delivery and skills differentiation, and likely achieve European excellence.

### **Policy options contained in the Roadmap**

Regarding the specific policy options outlined in the roadmap, we encourage the Commission to broaden the focus on sharing and reuse of data to encompass the entire data lifecycle. What would be particularly helpful from the Commission would be a set of detailed guidance (non-legislative) on the end-to-end management of data throughout its lifecycle from inception to analysis, subsequent reuse and ultimate decommissioning and deletion. At each stage of the data lifecycle, further guidance should be given on the appropriate data management processes that should be employed by firms to ensure the quality and utility of the underlying data set.

Data governance mechanisms provide a means to overcome technical and procedural variations between companies in terms of how they collect, store, and process and delete data. The extent to which these governance mechanisms can be harmonised across sectors and throughout the single market will be beneficial in enabling increased data sharing and reuse.

Practical anonymisation standards facilitate the deployment of new technologies and companies' responsible use of data, for example attribute suppression, record suppression, character masking, data perturbation, data aggregation and use of synthetic data. Such standards should include clear boundaries to reduce the perceived risk of sharing and contention with GDPR, particularly in relation to pseudonymised data. An agreed data access model, with governance controls common to all participants, to include configurable permissions management that helps assure the provenance of the data, ensures the longevity of the data feed to avoid stranding application services upstream and the rights of the seller and buyer of the data.

### **Conclusion**

We believe such guidance will be an important means to help establish European excellence in the field of data analytics, intermediation and brokerage, a market segment that is currently heavily dominated by a small number of non-European providers. Crucially any such guidance should be harmonised across the single market, under a common framework for end-to-end data lifecycle management, to overcome national fragmentation and fully leverage the scale and opportunity of a single European data space.