



Promoting Innovation Worldwide



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29 January 2021

European Commissioner Thierry Breton  
Rue de la Loi / Wetstraat 200  
1049 Brussels, Belgium

Dear Commissioner Breton,

On behalf of the [Information Technology Industry Council \(ITI\)](#), I am pleased to share with you ITI's comments to the **Data Governance Act proposal**. ITI is the global association of the technology industry. Our 75 members represent the entire spectrum of the technology industry: from internet companies, to hardware and networking equipment manufacturers, to software developers.

ITI and its members believe that preserving an enabling environment for data-driven innovation is fundamental to ensure Europe's global competitiveness and security. A robust and innovation-friendly framework for data governance is a key element to achieve the fundamental goal of facilitating data re-use and data sharing under clear EU wide rules, which can in turn unlock a tremendous potential for innovation. For this reason, we welcome the proposal to enhance the re-use of sensitive public-sector-held data, with a smart approach that is also geared towards ensuring compliance with third parties' rights.

Our comments highlight some aspects of the proposal which we believe could be improved, in order to make sure that data re-users can count on a solid and unambiguous legislative framework providing clear, proportionate and non-discriminatory obligations. Specifically, we suggest simplifying the provisions around international transfers of non-personal data, preventing onerous obligations that could stifle data re-use and clarifying the scope of provisions on data sharing services providers.

I hope that our feedback can facilitate a constructive exchange and provide relevant insights for your future work in the field. ITI is committed to serving as a resource for policymakers as the legislative debate on this file progresses, and we look forward to collaborating with you in the future.



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