

# Data Intermediaries and the DGA: Understanding and complying with the DISP label

Natalie Bertels, KU Leuven  
27<sup>th</sup> October, 9:30-11:00, Room 4F

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**INCLIVA | VLC**  
Biomedical Research Institute



UNDER THE AUSPICES OF



EUHUBS4DATA, DATA, AI AND THE NEW SOCIETY

# EUH4D experience with Data Intermediaries

Daniel Sáez-Domingo, ITI  
27<sup>th</sup> October, 9:30-11:00, Room 4F

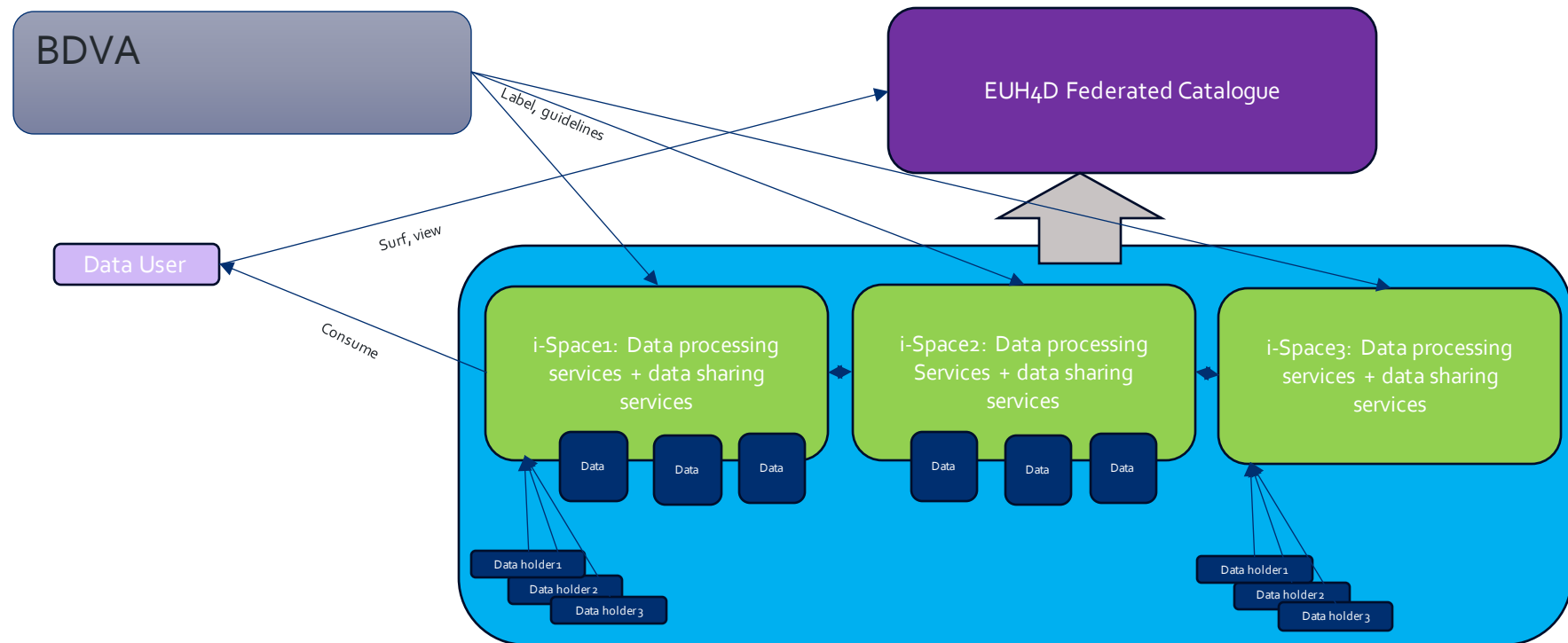
EUHUBS4DATA  
EUROPEAN FEDERATION OF  
DATA DRIVEN INNOVATION  
HUBS



# Mission

The Federation's mission is to accelerate the evolution and adoption of Data driven innovation and AI Technologies and regulations in Europe by facilitating a safe, trustworthy and regulatory compliant environment for cross-border and cross-sector data-driven experimentation. The Federation links relevant European initiatives on Data and AI in a single ecosystem providing a sustainable high-quality and global European **federated catalogue of data sources**, data-driven services, courses and solutions deployed locally by the i-Spaces.

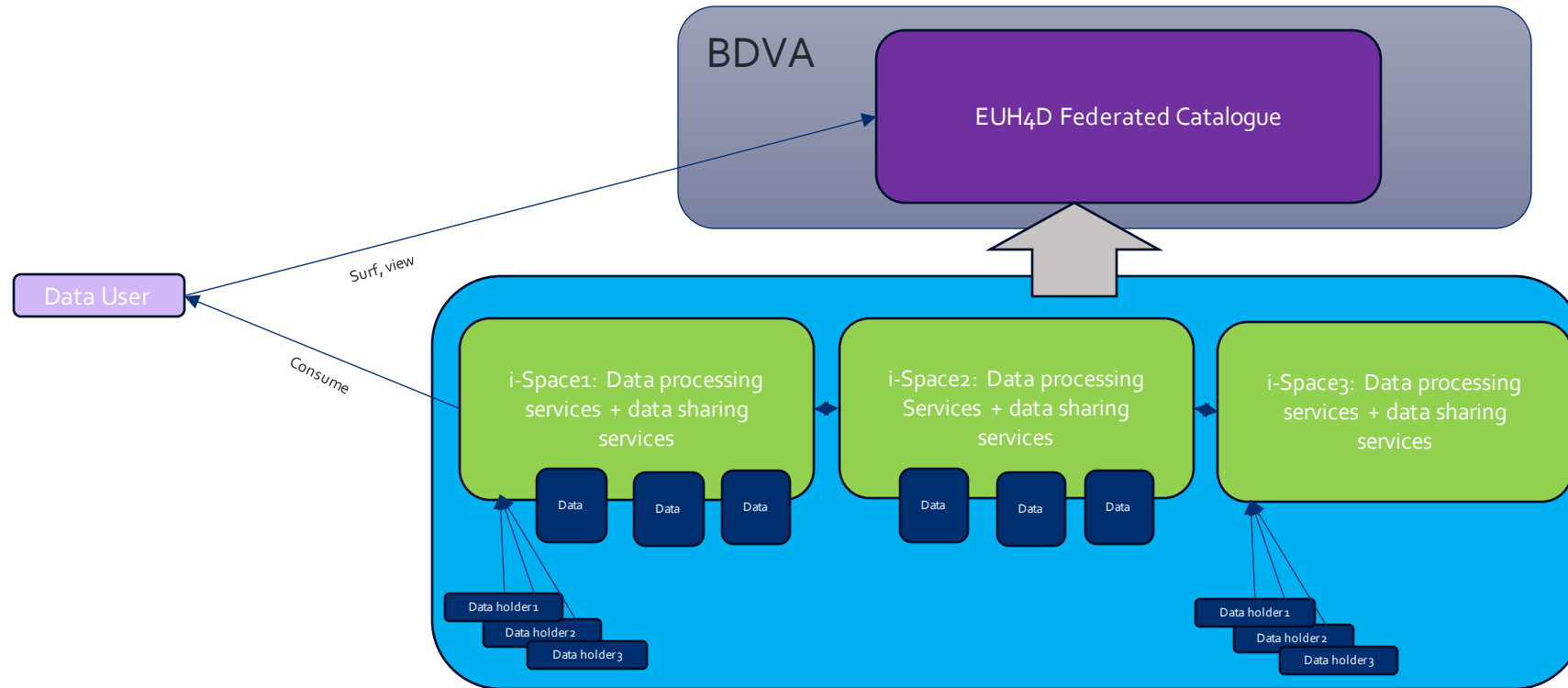
# Initial Approach (in the project)



- One legal entity for each i-Space
- 38 legal entities working loosely coupled before EUH4D
- BDVA is an additional legal entity that gives the label and defines guidelines
- EUH4D creates the framework for working together and federate services and data
- A Federated catalogue that needs to be hosted by a legal entity
- A Federated Catalogue for sharing data from third parties and other services -> A data Intermediary

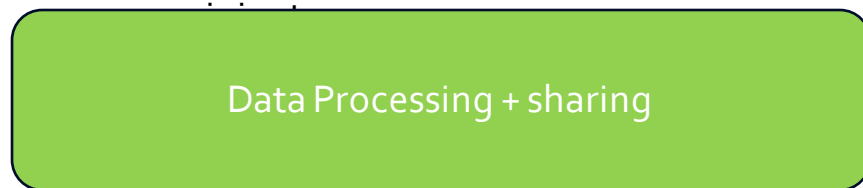
**38 + BDVA**

# Initial Approach (after the project)



# But DGA imposes some requisites

- Data Governance Act comes into action in September 2023
- The federating entity (i.e. BDVA) is intermediating with data from third parties. Then, **it is considered a Data Intermediary.**
- Data intermediaries have strict obligations under Art. 12 DGA, e.g.:
  - May only intermediate from a separate legal entity.
  - May not offer services beyond those purely facilitative of data sharing.
  - May not use intermediated data for (nearly) any purpose beyond putting it at the disposal of the data



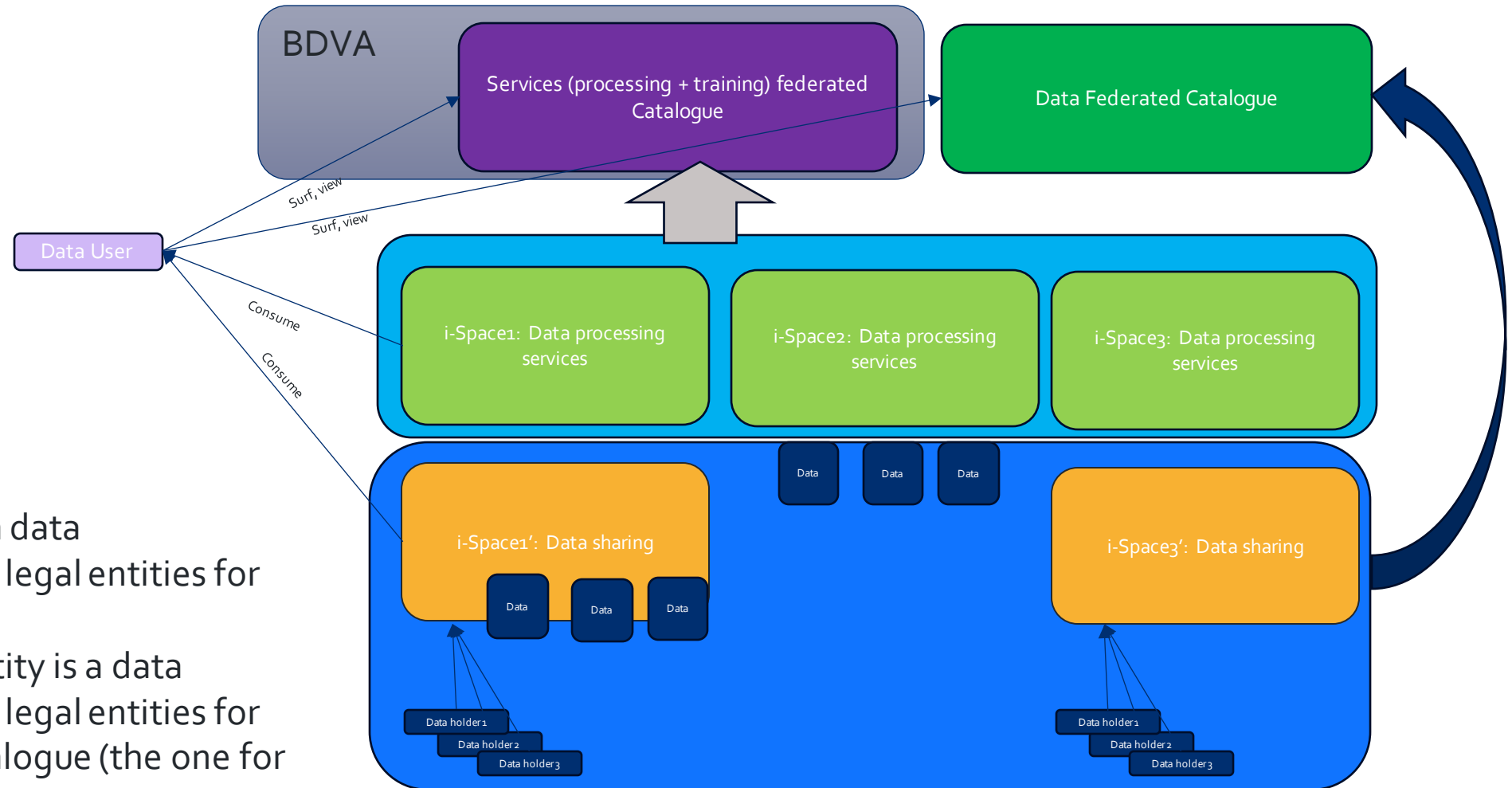
*Before DGA*



*With DGA*

# To be fully compliant with DGA

"76" + 2  
"76" + 1 + BDVA



- "Each" i-Space is a data intermediary: Two legal entities for each i-Space
- The federating entity is a data intermediary: Two legal entities for the federated catalogue (the one for services can be BDVA)



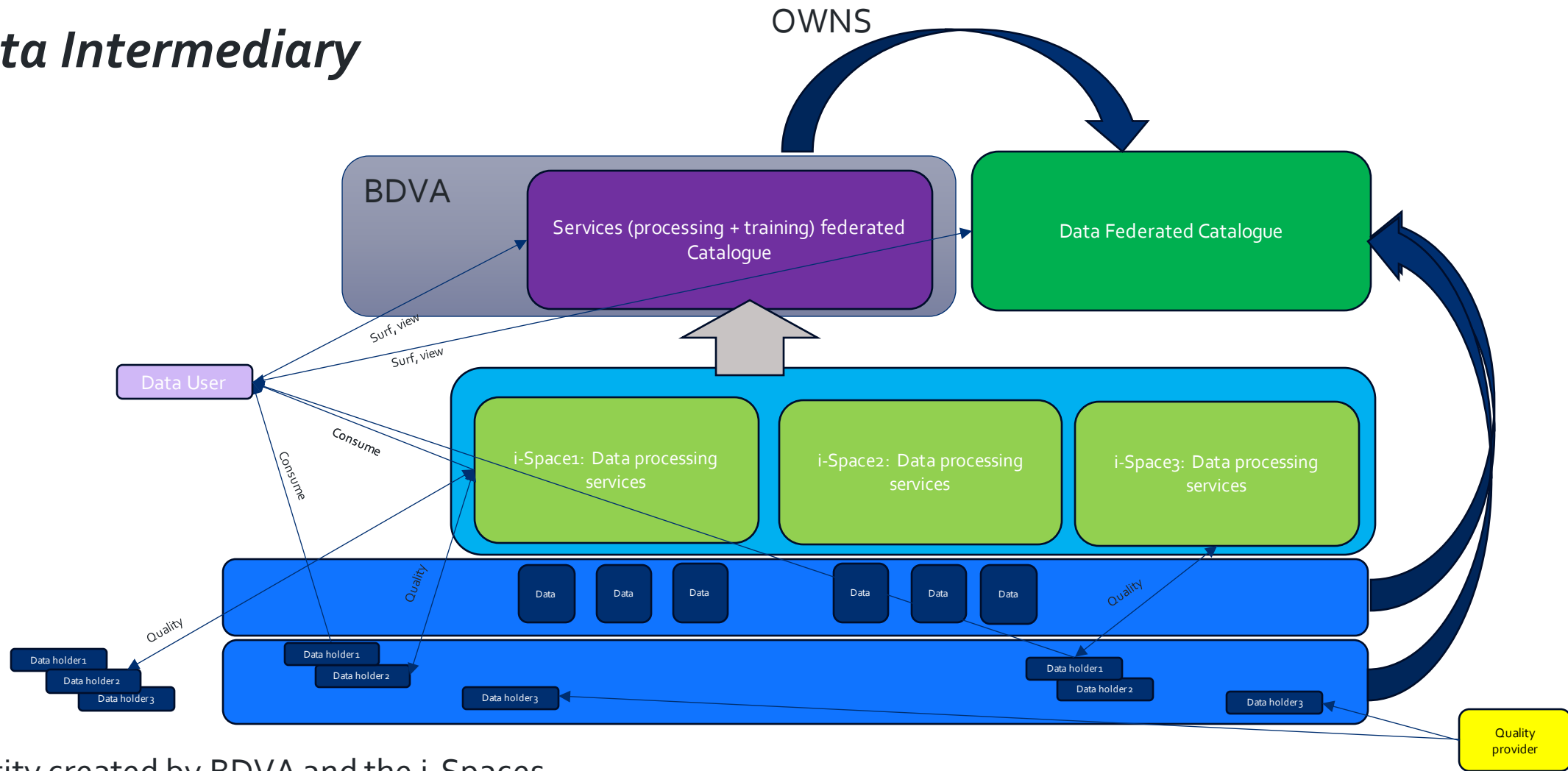
**New regulations are generating new needs and are making more complex, but controlled, the activities around data sharing not only for i-Spaces, but for many more actors.**





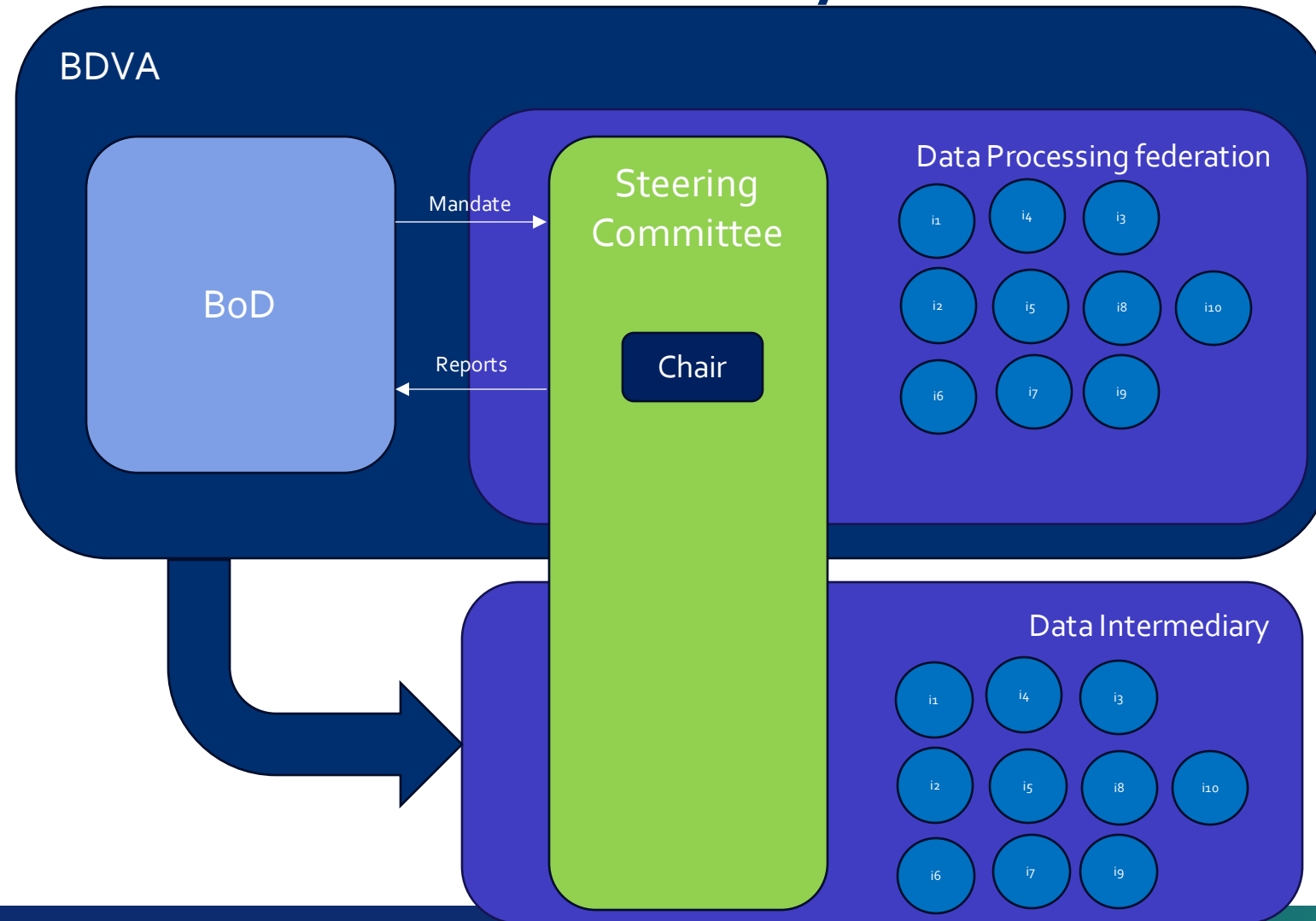
**Why do not take the DGA as an Opportunity  
instead of a barrier and create a Data  
Intermediary Entity from i-Spaces?**

# New Data Intermediary



- New legal entity created by BDVA and the i-Spaces
- It is a data intermediary with i-Spaces' Data and Data coming from third parties
- It only accepts qualified data (qualified by i-Spaces or by other providers)
- i-Spaces provide a service of data quality to any data holder (not only those that put the data in the federated catalogue)

# Structure of the Federation (two legal entities, but very correlated)



- Two Federations
- Members: i-Spaces
- Services Federation inside BDVA (as a TF)
- Data Intermediary subsidiary of BDVA
- Services & Data: Provided by i-Spaces or granted by an i-Space
- Same i-Spaces in both Federations
- Steering Committee with 1 member per i-Space. Same SC for both Federations
- 1 Chair
- BDVA BoD gives a Mandate to both and accepts reports

# Federation Business Model for 2 Federated entities

- Members of both Federations will be the same and represented by i-Spaces that will be able to choose participating in either or both of the Federations.
- 1<sup>st</sup> Federation of i-Spaces providing a catalogue of services and courses.
- 2<sup>nd</sup> Federation of i-Spaces providing data sources subsidiary to BDVA.
  - Third parties will be able to share their data in the second legal entity after undergoing a check performed by one i-Space service of data quality

# Value proposition

	BDVA	Data Intern
<b>i-Spaces</b>		
Visibility of the i-Spaces and their service provision	✓	
Visibility of the i-Space and datasets offered		✓
Be part of a Community – learn and gain knowledge from similar entities, define synergies and identify new collaboration opportunities.	✓	✓
Attract a broader customers' market	✓	✓
<b>SMEs/startups</b>		
Access to specialized data services, AI, analytics & technology provided by multiple DIHs	✓	
Access to other types of services: technological consultancy, infrastructure & data platforms, business development, legal issues or ecosystem building at a regional EU level.	✓	
Access to training material and courses	✓	
Technical support in the development of Proofs of Concept (PoC) and Minimum Viable Products (MVP).	✓	
Sustainability of developed services and products in the mid/long term.	✓	
Access to cross-border and cross-sector experiments.	✓	
Access to international datasets already tested and curated.		✓
Access to other type of data offered data platforms/data providers.		✓
Access to EU markets through interconnection with European organizations.		✓
Dissemination and impact.	✓	✓

# Key Resources

Asset	BDVA	Data Intern
Big Data & AI Maturity Model and KPIs	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Branding of the project	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Federated Catalogue*	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Community of i-Spaces	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Data Forum	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Data Week	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Ethics toolkit*	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Mobility program model	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Paper with findings from the experiments	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Social media account	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Stakeholders group	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

# Revenue Streams

Type of revenue streams	BDVA	Data Intern.
Membership fee	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Subscription model	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Brokering fee	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Public funding	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Sponsorship and Registration Fees for Data Week* event	<input checked="" type="checkbox"/>	<input type="checkbox"/>
½ Sponsorship and registration fees for Data Forum* event	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

\*These events with their costs and organization dynamics may change once Federations are set up. At the moment, the Data Forum event would be co-organized among the two federations.

# Thank you!

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