

## Response to EC roadmap consultation on the Data Act

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### Summary

Insurance Europe welcomes the overall objective of the European Commission to create a single market for data, where data from public bodies, businesses and citizens can be used safely and fairly for the common good.

For insurers, a greater availability of data could lead to improved risk monitoring and assessment, better customer experiences and increased fraud detection. The more data that is available for the common good, the better the digital solutions and analytical models will be.

Individuals should be able to provide access to their personal data to a much higher extent than is possible today. There should, for example, be practical solutions that would allow individuals to exercise control over their own data, with appropriate consideration given to the security of sensitive data. For example, individuals should be able to grant third parties access to their data: for instance, if a customer decides that an insurance undertaking may access their driving data, the vehicle manufacturer should grant access on reasonable terms.

The insurance industry also supports the overall approach set out by the Commission in its Data Strategy, which recognises that sector-specific legislation on data sharing should only be introduced where market failures have been identified. The upcoming Data Act should therefore strengthen the framework conditions for data collaboration and partnerships.

The data economy can only be successful if the different players involved have suitable means available to them to share and exchange data. Otherwise, important data will remain inaccessible, despite having the potential to reveal valuable new insights if re-used and recombined. At the same time, individuals and companies alike should have the choice to make their data available to others.

It will also be important to establish a framework on how to exchange data between companies from a technical viewpoint, to ensure an appropriate anonymisation of data to protect privacy. This would help to further encourage research and development, as well as the creation of anonymised data sources.



Insurance Europe also welcomes the Commission's objective of establishing more competitive markets for cloud computing services. Insurers have reported difficulties concerning the concentration of cloud service providers, which results in high levels of market power and an imbalance in the negotiating power between the parties. This becomes a particular challenge in the case of SMEs. The concentration of market power among a few large cloud providers also contributes to the limited possibility to switch providers and standard terms and conditions that are offered on a take-it-or-leave-it basis.

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