

Response to EC roadmap consultation on legislative framework for governance of common European data spaces

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Summary

Insurance Europe welcomes the overall objectives set out in the roadmap, namely:

- To make more data held by the public sector usable for research and innovative uses (ie development of new products and services).
- To allow individuals to consent to greater access to their data for the common good.
- To enhance overall data use in the economy by lowering transaction costs, addressing interoperability and standardisation, and facilitating voluntary data sharing.

These policy objectives, and the general idea behind common European data spaces, are positive steps, and will contribute to ensuring a future-proof, innovation-friendly framework that supports data-driven business and enables the digital transformation of society, while ensuring appropriate protection for consumers. However, much depends on the specific mechanism or instrument that is chosen, as the nature of certain policy options is not sufficiently clear at this point: eg the creation of European coordination bodies or “structural enablers”, or a common European consent form.

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

Insurance Europe believes that individuals should be able to allow 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. Individuals should be able to grant other parties access to the data generated by them: eg 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 supports the strategy's aim that sector-specific legislation on data-sharing should only be introduced where there are identified market failures. The focus of the data strategy should be on strengthening the framework conditions for data collaboration and data partnerships.



Insurance Europe supports the approach of the EU data strategy to create common European data spaces that build on existing EU legislation: eg the Open Data Directive and the General Data Protection Regulation (GDPR). It is crucial to have a data strategy at European level that allows the benefits of data usage to be maximised, while at the same time protecting and respecting users' rights. Where possible and feasible, the data should therefore be presented in an anonymised form.

It is important that the development of common European data spaces creates a common understanding between industries with regard to data specification, update frequencies, governance, data quality, enforcement, etc. The alternative may result in a patchwork of unrelated, non-interoperable databases that offer no real benefit.

It will also be important to establish a framework on how to exchange data between companies from a technical viewpoint, ensuring 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.

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Insurance Europe, which is based in Brussels, represents undertakings that account for around 95% of total European premium income. Insurance makes a major contribution to Europe's economic growth and development. European insurers pay out almost €1 100bn annually — or €2.9bn a day — in claims, directly employ over 900 000 people and invest nearly €10 200bn in the economy.