

EU Data Act 2026: From Compliance Requirements to Implementation - Webinar Transcript

1

00:00:07.160 --> 00:00:22.440

Bas Overtoom: Okay, hello everybody, and very happy to be here with you today for yet another webinar on an important topic, the EU Data Act update.

2

00:00:22.440 --> 00:00:36.249

Bas Overtoom: We have done once a webinar before, about a year ago, and in the meantime, also, we have done many, many projects, actually, helping clients with implementation of

3

00:00:36.250 --> 00:00:37.729

Bas Overtoom: of the Data Act.

4

00:00:37.730 --> 00:01:00.920

Bas Overtoom: And since there is also a new deadline coming up, we thought it would be good to do a bit of a refresher on what's at stake and what's coming up, and also use

the opportunity to do a bit of sharing how other companies are dealing with this important regulation that you can use for your own journey on this act.

5

00:01:01.760 --> 00:01:26.739

Bas Overtoom: So, my name is Bas Overtone. I'm leading the Nemko Digital Initiative from Amsterdam. I have an extensive background in data analytics for over a decade. Been active with that topic in different consultancies, and since two years, joined Nemko Digital from our Amsterdam hub, where we are dealing with AI data and cyber-related matters for compliance, but also

6

00:01:26.740 --> 00:01:28.019

Bas Overtoom: for, trust.

7

00:01:28.020 --> 00:01:33.189

Bas Overtoom: And I'm here today with my colleague, Monica. Maybe, Monica, you can introduce yourself.

8

00:01:40.790 --> 00:01:52.259

Mónica Fernández Peñalver: Yeah, sure, thanks, Bas. So, for those of you who don't know me already from other webinars, my name is Monica, I'm part of the Nemko Digital team for

9

00:01:52.260 --> 00:02:09.730

Mónica Fernández Peñalver: since 3 years now, and, have been working closely with, with, projects related to AI and data, and, anything related to, to governance around, yeah, AI and data has been my...

10

00:02:09.729 --> 00:02:20.170

Mónica Fernández Peñalver: my expertise, and this year has been an exciting year at Nemko Digital because of the Data Act, which is why we're here.

11

00:02:20.170 --> 00:02:36.099

Mónica Fernández Peñalver: To talk about today. Been, working closely with, many of our... of our clients on how to bring, them to being Data Act ready for this September, for this month, actually.

12

00:02:36.100 --> 00:02:47.269

Mónica Fernández Peñalver: My background is on AI and data governance, and I'm happy to share some of the knowledge today. Thank you, Bas.

13

00:02:48.040 --> 00:02:52.570

Bas Overtoom: Great, and thanks for being in the call, in your busy schedule.

14

00:02:52.730 --> 00:03:17.640

Bas Overtoom: Let's get to it. Just a few words on Nemko. I think many of you know us. We are part of Nemko Group that has 90 years of history as a product testing and compliance body, and two years ago, we established the Amsterdam Nemko Digital to really bring all the digital trust services together, and we have been growing quite crazy since, and been active all

15

00:03:17.640 --> 00:03:25.879

Bas Overtoom: all over the world, supporting clients now also on Digital Trust Matter, which is really, let's say, on the top of mind of, of most people.

16

00:03:26.270 --> 00:03:45.350

Bas Overtoom: these are some of the services we provide there, so compliancy, like EU data at CR8, that kind of stuff, but also, yeah, on the advisory side, we are helping, with the implementation of AI governance, even AI platform tooling, AI testing, yeah, all

17

00:03:45.350 --> 00:03:53.380

Bas Overtoom: All you can think of in the digital quality and trust domain, we are having interesting experience and expertise.

18

00:03:53.380 --> 00:04:09.680

Bas Overtoom: And I think uniquely about Nemko is that we are not only checking if you have made the finish line, like our other company, but we're actually helping you to come to the finish line, which is also so important for these digital trust regulations, as we see also within the Data Act.

19

00:04:10.420 --> 00:04:27.759

Bas Overtoom: So, let's dive into it. I will do a short introduction on the Data Act, high level, and then we will do a little quiz, and then Monica will take us further along on some of, let's say, the critical updates, and going deeper into that Act, and also

20

00:04:27.760 --> 00:04:34.689

Bas Overtoom: how we are doing some of these implementations. So basically, that's the, that's the planning for the coming

21

00:04:34.690 --> 00:04:52.680

Bas Overtoom: I think about 30 minutes, we will be talking in this webinar, and then there will be a little bit of time for Q&A if you have any questions. So the Data Act, it has different aspects, but basically the majority of the attention and the main part of the Act is that it's about

22

00:04:52.680 --> 00:05:00.690

Bas Overtoom: The sharing of data, and making a data available to, in the end, the end users that are using your product or service.

23

00:05:00.690 --> 00:05:25.599

Bas Overtoom: but also to potential data recipients that we come on later, which are people in the ecosystem. So, always a good example that we give is, imagine you have an elevator, and this elevator is something that you are placing there in somebody's building, then the owner of the building that is then indirectly becoming the owner of the elevator.

24

00:05:25.600 --> 00:05:31.289

Bas Overtoom: Yeah, should be able to have access to the data of the elevator, maybe to understand

25

00:05:32.570 --> 00:05:51.030

Bas Overtoom: where the people are, on which floors they are, how much the elevator's been used. You can imagine all kinds of reasons for building owners, with the idea also of smart buildings, that they need insights into their elevators and, yeah, the data, the usage data, to manage other activities in the buildings.

26

00:05:51.090 --> 00:06:08.680

Bas Overtoom: Also, you can think, for example, about, hey, the elevator needs to be maintenance, so there is a maintenance company that needs to come in to check on the elevator, and it needs to be repaired, or then also they have a requirement to be able to access that data to be able to do their maintenance work.

27

00:06:08.770 --> 00:06:31.480

Bas Overtoom: So this is quite logical, and you see also that, yeah, maybe you're already doing, making this available, but we see also that it's not happening everywhere. And now with the Data Act, which has already been enforced last year, it is compulsory for every company to do so and make this available if you're active with your products and services in the European

28

00:06:31.480 --> 00:06:52.139

Bas Overtoom: union. So it cannot be that you say, yeah, I have this service, and I'm not able, or I don't want to give this data away to the users or other people in that ecosystem that should be able to make use of that. And I think that's a very, yeah, let's say the core concept of what the Data Act does.

29

00:06:52.140 --> 00:07:05.619

Bas Overtoom: And that's also the core concept that we are working towards. And that sounds simple, but also, in practice, it can be actually quite cumbersome, because what data are we then sharing? That's one.

30

00:07:05.650 --> 00:07:17.680

Bas Overtoom: what agreements do we have with those people on the data sharing? That's another one, so those are two very, very important and challenging aspects when you are diving deeper into this

31

00:07:17.680 --> 00:07:32.670

Bas Overtoom: regulation, and I think Monica will give some more examples, yeah, of how that then works in practice. But this is the core idea of what the data exponents. It cannot be that if you have a digital product, that the data doesn't... is not available outside of the product.

32

00:07:32.670 --> 00:07:37.960

Bas Overtoom: That you need to make available for users, or for people that are using it in the ecosystem.

33

00:07:39.010 --> 00:07:55.840

Bas Overtoom: So that goes, of course, for the product itself, the connected product, the physical thing, but also to any of the related services that are connected to the product, like an app, insights, these kind of things. That is all part of the scope. So we also have seen quite a couple of examples

34

00:07:55.840 --> 00:08:14.439

Bas Overtoom: in the recent months, where people are thinking and scoping it all related to the product, the physical product, but then, hey, forgetting about, yeah, some of the other services that are connected to it. But the data takes that all into one kind of scope. So that's the scope that you should look at when you're bringing your products and services to market.

35

00:08:15.780 --> 00:08:35.380

Bas Overtoom: I already mentioned the names a little bit. Here's another example of the three main parties that are in play when it comes to the Data Act. There's actually a couple of more parties, and we will deep dive on that a little bit more when we are going through some of the details, but the main three are

36

00:08:35.380 --> 00:08:48.219

Bas Overtoom: In the end, the data holder, that is often you as a product and an organization developer, because you are, in the end, keeping that data together somewhere in a database.

37

00:08:48.220 --> 00:08:54.859

Bas Overtoom: But then there is the users that are, in the end, the owners of the service.

38

00:08:54.860 --> 00:09:10.530

Bas Overtoom: that need to have access to the data. And then you have also what I mentioned already earlier, is the data recipients, entities that are part of this ecosystem, a third party between you and the user, that is also playing and has a need to know

39

00:09:10.780 --> 00:09:29.980

Bas Overtoom: or need to access to get this information, for example, to support the user in some of his needs, or for example, to be able to do their services on it, so then you need to kind of be able to share that. So these are the three main parties that you should think about when you're thinking about that ecosystem.

40

00:09:30.650 --> 00:09:38.510

Bas Overtoom: And there comes a fourth party. When we're really looking at the pillars and the scope, these are the pillars and kind of the main chapters.

41

00:09:38.510 --> 00:10:03.489

Bas Overtoom: into that, and that is also that you need, in some cases, to be able to kind of be able to share your data to public sectors and public authorities if they do request so. And there's also a few of the requirements in there. We don't go too much into it in this webinar due to time, but with the clients, we're also preparing then if, is there a chance that you might be needing to deliver

42

00:10:03.490 --> 00:10:07.929

Bas Overtoom: data to the government authorities, and are you then ready to do that in an effective manner?

43

00:10:08.120 --> 00:10:09.970

Bas Overtoom: But that's basically...

44

00:10:10.550 --> 00:10:27.840

Bas Overtoom: the main thing, here you see all the things, but these three, let's say, highlighted things are the main chunk of the things. The sharing, and also the contracts, yeah? Because it's not only making that data available, but it's also having guidance.

45

00:10:27.840 --> 00:10:52.830

Bas Overtoom: on the... on the, let's say, agreements that you're making with your party, and that can be, putting that in the user's manuals and aspects. This is how we can deliver data, and the quality that we can do, and your rights as a user, and what we need from you if we want to share it with data recipients, all these kind of things, you have to describe it somewhere. Well, and if you have B2B services, then it's often in the contracts that you have with

46

00:10:52.830 --> 00:11:00.589

Bas Overtoom: other organizations. This can be tricky things if you don't know what you're doing, but that's, I think, where we come in with many of the clients, because

47

00:11:00.590 --> 00:11:12.370

Bas Overtoom: And we're helping them to bring up the right, let's say, bits and pieces of that contract to bring and integrate that into the kind of agreements that you have in that ecosystem.

48

00:11:12.370 --> 00:11:20.860

Bas Overtoom: There's a few other ones, cloud switching interoperability, that's mainly for cloud providers, so I don't think you have to worry about it, and then there's a few other

49

00:11:20.860 --> 00:11:32.099

Bas Overtoom: let's say, yeah, important things, but we will not dive into it. The heart is in those first two elements, and that public sector thing is something that we want to kind of highlight.

50

00:11:32.120 --> 00:11:35.120

Bas Overtoom: When it comes to the Data Act.

51

00:11:35.560 --> 00:11:53.670

Bas Overtoom: Couple of deadlines, so, the main ones are, every year on the 12th of September, so last year it already became a requirement that users were able, by law, to request for the data that they,

52

00:11:54.830 --> 00:11:56.480

Bas Overtoom: head, and...

53

00:11:56.940 --> 00:12:03.790

Bas Overtoom: That they wanted access to, and then you would need to be able to deliver that in a fair amount of time.

54

00:12:03.790 --> 00:12:27.259

Bas Overtoom: And now it is expected that to be able to bring, let's say, have the right data access design provided, if possible, in a direct way, and Monica will deep dive much more into that. What is data meaning, and how you should think about it, but now is the idea that you do that as much as possible in an automated way. And the question there is also, yeah, what is then

55

00:12:27.260 --> 00:12:44.720

Bas Overtoom: the data that I need to share. What is a reasonable and acceptable format, and what is a reasonable and acceptable way to do so? And there we see also some of the clients have, let's say, different discussions, and we can provide a lot of, let's say, guidance on making that. And that's the deadline that's coming up.

56

00:12:44.720 --> 00:12:58.889

Bas Overtoom: So we will spend quite a bit of time on the 12th of September, and how that differs from the 25th year, last year. Next year, at one point, you see that cloud thing is coming in, that's for most people out of scope.

57

00:12:58.890 --> 00:13:06.920

Bas Overtoom: But then also, yeah, you have to make sure that also by next year, you have reviewed all the contracts, all the contracts that you have.

58

00:13:06.920 --> 00:13:12.830

Bas Overtoom: To make sure that they're also in line with the Requirements of Data Act.

59

00:13:13.250 --> 00:13:19.680

Bas Overtoom: So, that's basically it. I would like to,

60

00:13:19.890 --> 00:13:38.799

Bas Overtoom: to check with you, before I give the word to Monica to drive us to that journey, of, yeah, what we're seeing at clients, and how is the... how should you understand that part of data access? Exactly, what are the terminologies and the reflections on that? A question to you.

61

00:13:38.800 --> 00:13:53.609

Bas Overtoom: How far, and we will give you, by the end of this webinar, when we collected and processed all the data, we will give you also some of the insights back, so please all fill it in. Where are you in this data explanation? We haven't started.

62

00:13:54.330 --> 00:14:08.700

Bas Overtoom: we're still assessing, the obligations, or hey, we are busy implementing it, we're almost done, we have a few gaps, or are we fully ready? Actually, this is more of a kind of a sanity check. Or, the last question.

63

00:14:08.760 --> 00:14:28.349

Bas Overtoom: Actually, I'm just here to learn what the Data Act is about. I am not really aware. That's, of course, also possible, so let's see where the audience is today. So

thanks for filling that in. And with that, Monica, I would like to give you the word to kind of guide us through that content of the Data Act and your experiences.

64

00:14:36.190 --> 00:14:37.070

Mónica Fernández Peñalver: Alright.

65

00:14:37.460 --> 00:14:46.769

Mónica Fernández Peñalver: Thank you, Bas, for the nice introduction. I think that was a pretty good overview of what the Data Act is about.

66

00:14:46.770 --> 00:15:00.000

Mónica Fernández Peñalver: Now we'll dive a bit more into the terminology and what the Data Act means by things like direct data access or indirect data access.

67

00:15:00.040 --> 00:15:16.690

Mónica Fernández Peñalver: Considering that now in September, so next week, Friday, I believe, the next deadline, comes in, which is that new connected products must have data access designed in... in the product.

68

00:15:16.880 --> 00:15:34.029

Mónica Fernández Peñalver: And, as Bas already mentioned, data access by design doesn't necessarily mean that it has to be, like, automatic, and that they should, that, users have access to this.

69

00:15:34.030 --> 00:15:38.180

Mónica Fernández Peñalver: Designed directly, but it can also be done indirectly.

70

00:15:38.320 --> 00:15:47.209

Mónica Fernández Peñalver: Direct data access would mean the ability to download or stream the generated data without

71

00:15:47.510 --> 00:15:59.670

Mónica Fernández Peñalver: even involving you as a data holder, so they can just automatically do that. And indirect data access could involve a request mechanism.

72

00:15:59.670 --> 00:16:14.640

Mónica Fernández Peñalver: That allows the... the user to... to request such data, whether it is for themselves, the data user... the data user, or whether it is to share with a third party.

73

00:16:15.120 --> 00:16:19.200

Mónica Fernández Peñalver: So, this could be in the form of a...

74

00:16:19.330 --> 00:16:37.029

Mónica Fernández Peñalver: A simple request form that you host online in your webpage, and then there's, of course, a process behind it to handle these requests, and to validate that these requests are indeed valid.

75

00:16:37.910 --> 00:16:44.520

Mónica Fernández Peñalver: But we can look at the different forms now. Bas you can, go to the next slide.

76

00:16:45.350 --> 00:17:08.920

Mónica Fernández Peñalver: So, the first, the first, setup that we can have is, direct access, as Bas mentioned, and, what the regulation says is that where possible, if possible, the data holder should always give direct access to the user of the connected product.

77

00:17:09.119 --> 00:17:17.909

Mónica Fernández Peñalver: Of course, that is not always possible, and even there... sometimes there are even scenarios where the data is being,

78

00:17:18.230 --> 00:17:34.689

Mónica Fernández Peñalver: Processed itself in... in... in the product, inside the product, and, and there's no way of accessing the... the data unless the product is being, opened up.

79

00:17:34.880 --> 00:17:46.430

Mónica Fernández Peñalver: So, it is normal to encounter this method being the most difficult to implement. If your... if your product is not already designed.

80

00:17:46.430 --> 00:17:58.260

Mónica Fernández Peñalver: In... in this way to allow this direct access, but, the regulation only says that, if possible, this should be the way to do it.

81

00:17:59.920 --> 00:18:10.860

Mónica Fernández Peñalver: Then, the other option, if we... if we move on, Bas, we would have the indirect data access. So, as mentioned.

82

00:18:10.860 --> 00:18:25.900

Mónica Fernández Peñalver: This would be the scenario where, the data user can request, the data to... to the... to the company, to the data holder, to a request form, for example, and then,

83

00:18:25.900 --> 00:18:43.330

Mónica Fernández Peñalver: the data holder has set up processes behind it to respond to this, data request within a reasonable timeframe. One could say within... within a month, for example. And, throughout, within

84

00:18:43.330 --> 00:18:58.220

Mónica Fernández Peñalver: this response. Not only would you provide the data, but before, providing the data, send instructions to the user of how they can get themselves a hold of this data.

85

00:18:58.240 --> 00:19:14.559

Mónica Fernández Peñalver: There's also cases where it might be as simple as you as the data holder extracting and exporting that, data, packaging it up, and sending it over as historical data.

86

00:19:14.560 --> 00:19:26.179

Mónica Fernández Peñalver: But, there might also be scenarios where you can provide this data as, real-time data, and therefore, for that case.

87

00:19:26.180 --> 00:19:36.500

Mónica Fernández Peñalver: You would want, or you would need the user to set up a suitable webhook in order for them to retrieve such real-time data.

88

00:19:37.940 --> 00:20:02.650

Mónica Fernández Peñalver: The regulation, as it says, down there in the definition of indirect data access, it says that it needs to be extracted and delivered without undue delay. So, yeah, they don't really specify a timeframe, but you should mention this timeframe.

89

00:20:02.650 --> 00:20:06.910

Mónica Fernández Peñalver: In the communication with its customer, and

90

00:20:06.910 --> 00:20:15.459

Mónica Fernández Peñalver: Commit to delivering this timeframe, if it's technically feasible for you to... to deliver it.

91

00:20:17.830 --> 00:20:23.659

Mónica Fernández Peñalver: Now, moving, moving to the next scenario...

92

00:20:23.790 --> 00:20:43.939

Mónica Fernández Peñalver: Then there's also the scenario where the user may ask you to share their, data to... with a third party. In the scenario of the elevator that we saw at the beginning, it could be that the... that the user of... of... of the elevator

93

00:20:43.940 --> 00:20:48.279

Mónica Fernández Peñalver: They... they want to hire a repair company.

94

00:20:48.280 --> 00:21:02.660

Mónica Fernández Peñalver: To... to fix the elevator or, do some maintenance on it, and therefore, sharing the data with them, is the most practical way, to, to come around this.

95

00:21:02.700 --> 00:21:22.149

Mónica Fernández Peñalver: And so, what the Data Act, provides is this, right for the users to request this data to be sent directly to... to this third party. Most of the times, if not always, this... this way of accessing would be,

96

00:21:22.150 --> 00:21:23.670

Mónica Fernández Peñalver: this indirect.

97

00:21:23.670 --> 00:21:34.560

Mónica Fernández Peñalver: Way, again, involving, a request process, where one can say, please share my product data with, with this third party.

98

00:21:34.580 --> 00:21:38.400

Mónica Fernández Peñalver: And then the whole setup would have to be arranged with them.

99

00:21:40.320 --> 00:21:52.669

Mónica Fernández Peñalver: And then, same as before, instructions for how to receive this data, would have to be set up, as well as,

100

00:21:52.670 --> 00:22:02.619

Mónica Fernández Peñalver: Yeah, any contract, or agreements between the data holder and the third party, for the protection of such data.

101

00:22:09.890 --> 00:22:29.069

Mónica Fernández Peñalver: So, parties who can access the data, here we have, three of them. I mean, just to go over them again. Of course, there's, the user who can, access the data directly if possible, and if not indirectly,

102

00:22:29.160 --> 00:22:43.509

Mónica Fernández Peñalver: The reason, we place AND slash OR is because, maybe you might want to set up, both. There are scenarios where, maybe your product is already by design.

103

00:22:43.510 --> 00:22:59.020

Mónica Fernández Peñalver: Making this data available to... to the user, but there might be some developments, in the future, future product developments, or new data, being integrated, in the product.

104

00:22:59.020 --> 00:23:10.720

Mónica Fernández Peñalver: That may not immediately fall into this direct access mechanism, and therefore, you may want to set up this... you could call it a safety net.

105

00:23:10.720 --> 00:23:24.499

Mónica Fernández Peñalver: That, that is basically this indirect, process where if something is not already being made accessible to the user, you as the data holder still have

106

00:23:24.560 --> 00:23:30.649

Mónica Fernández Peñalver: that fallback process for... for people to request such data.

107

00:23:31.660 --> 00:23:39.510

Mónica Fernández Peñalver: Then, as a third party, a data recipient, these can look at, like.

108

00:23:39.510 --> 00:24:03.950

Mónica Fernández Peñalver: a third party acting on behalf of the user, and therefore they themselves could also be making their requests through this indirect mechanism. If this was the case, you would want to see a legal... a legal mandate that, that, they are indeed acting, or they can indeed act on behalf of the user.

109

00:24:04.580 --> 00:24:16.489

Mónica Fernández Peñalver: Or they can be, like, that scenario that we just saw. They can be the recipient of the data after the request has been made by the user themselves.

110

00:24:17.790 --> 00:24:33.220

Mónica Fernández Peñalver: And then, last but not least, Bas already mentioned, there's, scenarios where a public body, may request the data, could be, because of an emergency situation or, or non-emergency.

111

00:24:33.220 --> 00:24:45.020

Mónica Fernández Peñalver: And there, the Data Act does specify specific timeframes for which to make this data available. So, in emergency situations.

112

00:24:45.020 --> 00:24:50.090

Mónica Fernández Peñalver: The response to the request should be, sent within 5 days.

113

00:24:50.140 --> 00:24:54.220

Mónica Fernández Peñalver: And then a non-emergency within 30 days.

114

00:25:01.520 --> 00:25:07.700

Mónica Fernández Peñalver: And then, requirements of what the data should look like,

115

00:25:07.720 --> 00:25:27.440

Mónica Fernández Peñalver: We already talked about the difference between direct and indirect access, so I won't mention that again. But regarding the data format, the main rule of thumb, is, to make the data accessible to... or available

116

00:25:27.440 --> 00:25:44.419

Mónica Fernández Peñalver: to the user in the same quality as it is, available to you as a data holder. So, of course, in a comprehensive and commonly used machine-readable format, would be expected.

117

00:25:44.420 --> 00:25:51.510

Mónica Fernández Peñalver: And then with regards to timeliness, I already mentioned,

118

00:25:51.690 --> 00:26:00.159

Mónica Fernández Peñalver: the timeframes not being very well specified by the Data Act, except for public bodies.

119

00:26:00.160 --> 00:26:19.740

Mónica Fernández Peñalver: But still, you would want to show proof that you are, putting up processes in place to make sure that requests are being responded in a timely manner within what is technically feasible to you as a data holder.

120

00:26:26.620 --> 00:26:37.929

Mónica Fernández Peñalver: Now, we tried to summarize, the obligations around contract terms in this one slide, so, until now we were talking about

121

00:26:37.930 --> 00:26:48.050

Mónica Fernández Peñalver: Data sharing solutions, the different types of data sharing that can be implemented, to address the data sharing obligations.

122

00:26:48.050 --> 00:26:53.050

Mónica Fernández Peñalver: But the other side of, of, of the...

123

00:26:53.160 --> 00:27:04.200

Mónica Fernández Peñalver: the other main set of obligations that we need to comply with to comply to the... with the Data Act are obligations related to contract terms.

124

00:27:04.680 --> 00:27:17.399

Mónica Fernández Peñalver: The main objective of the Data Act is to make contract terms, and they call them FRAND, so Fair, Responsible, and Non-Discriminatory terms.

125

00:27:17.400 --> 00:27:30.800

Mónica Fernández Peñalver: To make sure, to protect weaker parties, from, for example, not having the rights, that, that they should have with regards to data access.

126

00:27:31.190 --> 00:27:46.879

Mónica Fernández Peñalver: So, the key contract topics that one would have to address in their contracts, either through the contracts themselves, or maybe even terms and conditions that are attached to those contracts.

127

00:27:46.880 --> 00:28:00.490

Mónica Fernández Peñalver: Would be to cover topics regarding, of course, data access, and the rights of users, and, of course, restrictions, and topics regarding confidentiality, and so on.

128

00:28:00.980 --> 00:28:15.630

Mónica Fernández Peñalver: We at Nemko Digital, we've helped many, many of our clients, navigate these contract terms, navigate, so, analyze their existing contracts and terms and conditions.

129

00:28:15.630 --> 00:28:33.019

Mónica Fernández Peñalver: and identify what would be necessary and what is not, as the Data Act leaves things up to interpretation, as well. So, finding justification for why you're setting up certain contract terms

130

00:28:33.020 --> 00:28:38.049

Mónica Fernández Peñalver: And why you're not setting up others, is also important.

131

00:28:38.790 --> 00:28:48.639

Mónica Fernández Peñalver: And the... regarding dates, we... well, Bas already mentioned, previously in the... this... at the beginning.

132

00:28:48.640 --> 00:29:01.489

Mónica Fernández Peñalver: that these contract terms should already be applied to all new contracts that were developed after the 25th of September 2025.

133

00:29:03.800 --> 00:29:17.669

Mónica Fernández Peñalver: And, so new contracts should already be adhering to these, FRAND terms, and then starting from September 2027, this should apply to

134

00:29:17.670 --> 00:29:35.079

Mónica Fernández Peñalver: to older contracts, so contracts that were drafted before... before September 2025, or those that are indefinite, in duration, or that will expire, in 10 years, so very long, long-term contracts.

135

00:29:35.870 --> 00:29:51.690

Mónica Fernández Peñalver: And I've really mentioned it, but I will mention it again. Ways of implementing this would be to review and amend your existing contracts, add a suitable appendix that addresses these data acts.

136

00:29:51.700 --> 00:30:10.190

Mónica Fernández Peñalver: topics and terms, or maybe address this by reviewing and amending your terms and conditions, or even add an extra sect of terms. And of course, communicate these amendments with

137

00:30:10.330 --> 00:30:13.080

Mónica Fernández Peñalver: With the... the customers.

138

00:30:13.580 --> 00:30:36.570

Mónica Fernández Peñalver: So, in a way, you can think of this obligation similar to the obligation that we have in the GDPR, where you must be transparent to your customer

that they have the right to access their own personal data. It's quite similar, with maybe an extra few things regarding,

139

00:30:36.570 --> 00:30:48.329

Mónica Fernández Peñalver: data formats and timeliness, but the whole idea is basically the same. You want to let your customers know that

140

00:30:48.330 --> 00:30:53.110

Mónica Fernández Peñalver: They do have access to this data now, by law.

141

00:30:57.810 --> 00:31:14.590

Mónica Fernández Peñalver: So, as we said, we've worked on several projects now to bring our clients to a state of readiness for the Data Act, and because of that, we've developed quite a few accelerators to

142

00:31:14.590 --> 00:31:19.689

Mónica Fernández Peñalver: To... to help streamline things for... for the upcoming projects.

143

00:31:19.690 --> 00:31:40.820

Mónica Fernández Peñalver: Yeah, we've, we've worked in different, different companies, developing different kinds of products. We have them over here, some developing devices for environmental, monitoring, and, some are, developing, devices, or,

144

00:31:41.180 --> 00:31:50.440

Mónica Fernández Peñalver: Connected products that will be implemented in much larger products in, in... in, more industrial settings.

145

00:31:50.480 --> 00:32:05.000

Mónica Fernández Peñalver: And then some even, developing connected products, as we can see, related to electrical vehicle charging equipment that, the user would be more consumer.

146

00:32:05.000 --> 00:32:11.199

Mónica Fernández Peñalver: consumer-based rather than, so much B2B, but more, B2C.

147

00:32:11.380 --> 00:32:19.559

Mónica Fernández Peñalver: So, we have quite a, diverse range of, of experience by now,

148

00:32:19.560 --> 00:32:33.360

Mónica Fernández Peñalver: Yet, we've identified that there is still quite a common struggle within all types of companies, which is to coordinate with the different entities within a larger company, how

149

00:32:33.360 --> 00:32:51.790

Mónica Fernández Peñalver: How to set things up, and who would be responsible to, for example, respond to requests, or to do user validation? Who would be responsible to communicate about the amendments of certain terms.

150

00:32:51.790 --> 00:33:04.869

Mónica Fernández Peñalver: And, at the end of the day, who is really responsible to comply with the Data Act when the organizational structure, is, more complex than usual?

151

00:33:04.890 --> 00:33:22.369

Mónica Fernández Peñalver: And through our work, we've been able to answer all these questions through the design of processes that we can then reflect in policies that are ready to go and ready to be implemented

152

00:33:22.370 --> 00:33:30.759

Mónica Fernández Peñalver: At either group levels or, even at, like, smaller subsidiaries, within larger companies.

153

00:33:31.980 --> 00:33:46.009

Mónica Fernández Peñalver: And yeah, if we go to the next slide, we can see what a typical, project, timeline can look like. As you can see in the blog above.

154

00:33:46.010 --> 00:33:56.259

Mónica Fernández Peñalver: It's more about addressing, data sharing, solutions, not just the technical solution in itself.

155

00:33:56.260 --> 00:34:20.840

Mónica Fernández Peñalver: But the policies and processes behind it, so there is some time, that one has to dedicate to that, of course, and then, in parallel, or, yeah, basically, almost in parallel, you can also start addressing the contract classes, and the contract applications that one need to, to address in order to

156

00:34:21.130 --> 00:34:29.850

Mónica Fernández Peñalver: to adhere to these frant terms that the Data Act, Yeah, allocates.

157

00:34:30.199 --> 00:34:48.739

Mónica Fernández Peñalver: So as you can see here, everything can be done within a 16-week, program, sometimes faster, sometimes, slower, depending on the maturity of the organization, of course. And, this project also considers

158

00:34:48.739 --> 00:35:07.469

Mónica Fernández Peñalver: Not just, setting up solutions, to share your... your data, but also considers, setting up processes and solutions for, maintaining the life cycle of your products, and also

159

00:35:07.470 --> 00:35:13.730

Mónica Fernández Peñalver: Yeah, considering that, you might develop new products in the future, then how do you...

160

00:35:13.730 --> 00:35:28.000

Mónica Fernández Peñalver: identify how will your teams, or who in your teams will identify whether these products or which data exactly will be falling in scope of the Data Act, because not all data will be falling in scope.

161

00:35:29.620 --> 00:35:30.210

Bas Overtoom: Yeah.

162

00:35:30.210 --> 00:35:42.419

Mónica Fernández Peñalver: And, that, I think with this, I will give the floor to, to Bas, and, we can start wrapping things up. I see there's also some questions, coming up.

163

00:35:42.420 --> 00:35:49.680

Bas Overtoom: We'll pick up the questions in a minute. Thank you very much. Thank you very much, Monica, for elaborating.

164

00:35:49.680 --> 00:36:14.609

Bas Overtoom: on some of the details behind it, and I think this slide is also particularly interesting, yeah, to get a view of a client journey. This is just one example, but I think it should be clear that, yeah, you cannot really do it in a week, but it also doesn't take a year if you know what you're doing, and if needed, we can help also to make things go faster, but apparently.

165

00:36:14.610 --> 00:36:26.219

Bas Overtoom: yeah, it's clearly that some of the things just take time. And if you look at myself, if you reflect at this one, take a little bit of a distance, there's really a step one, which is about this

166

00:36:26.360 --> 00:36:51.050

Bas Overtoom: inventory, scope, and what do we need to do, but then implementing technical implementation, process design and implementation, yeah, that always takes a bit of time, and so that's step two, and then getting those contract terms ready, that's kind of also a third bucket, which you could do a little bit more in parallel, and then you

make it a bit faster if needed. But, yeah, it is a project, and it stays a project, and that might be clear from all

167

00:36:51.050 --> 00:36:53.389

Bas Overtoom: All the things that are needed.

168

00:36:53.430 --> 00:37:12.380

Bas Overtoom: Then, yeah, how we have... I mean, Monica, you give 3 examples, but we have done many more of these projects, so, proud to say that we have really developed a good experience here, and we bring in also a couple of the accelerators that, if you want to work with us, that we can help. And here are some, of course.

169

00:37:12.490 --> 00:37:37.469

Bas Overtoom: decision trees, examples, so quickly to be able to decide, is my data in scope? Is my product in scope? And if so, what data do I need to share? Then I'm not going to go into the details, but this is something that we could use also with you in the session that we're offering for those interested in it, to kind of do an initial quick scoping, and that is really the first step to kind of

170

00:37:37.470 --> 00:37:38.080

Bas Overtoom: enough.

171

00:37:38.880 --> 00:37:54.339

Bas Overtoom: get going, to have an idea of, this is the products that I need to do something with, and this is then the data that I need to look into. That is basically step one. And for that data inventory, if you're then going to really detail that out, then we come into, let's say, this...

172

00:37:54.540 --> 00:38:09.990

Bas Overtoom: This is just the example, but a data inventory accelerator, where you can really easily define, of all the data points, what data it is then, that you actually need to share, and it is also a great tool to kind of

173

00:38:10.560 --> 00:38:18.559

Bas Overtoom: Stay updated, because it's not only once, but there's constantly new data coming in that you need to review.

174

00:38:20.020 --> 00:38:26.199

Bas Overtoom: Then, here on the legal contract terms, we have quite a couple of accelerators also.

175

00:38:26.730 --> 00:38:33.410

Bas Overtoom: For example, the snippets of the documents that you need to be able to share to make that,

176

00:38:33.520 --> 00:38:38.629

Bas Overtoom: possible. Maybe, Monica, you want to elaborate a little bit on the accelerators that we have here?

177

00:38:46.110 --> 00:39:10.459

Mónica Fernández Peñalver: Yeah, sure. So, here on policies and on contracts, as mentioned, we have been developing policies for, for many of our clients that reflect the processes behind, and also to embed, like, what we call it here at the EU Data Act Compliance Lifecycle, which

178

00:39:10.510 --> 00:39:16.179

Mónica Fernández Peñalver: We'll, cover things like product classification, the data inventory that

179

00:39:16.180 --> 00:39:39.499

Mónica Fernández Peñalver: that Bas, showed in the previous slide, and the indirect or direct data access processes that you would put in place, and then, policies around descriptions or instructions, internal instructions for how to respond to these direct and indirect, how to respond to indirect.

180

00:39:39.500 --> 00:39:40.979

Mónica Fernández Peñalver: requests.

181

00:39:40.990 --> 00:39:51.989

Mónica Fernández Peñalver: Also things that we... we have drafted, many times, and therefore it's a... it's a quick setup, now to do.

182

00:39:52.440 --> 00:40:09.760

Mónica Fernández Peñalver: Obviously, considering the... the... the capability, or the setup of your organization, and of course, making sure that things make sense within your organization, but the... the building blocks, we'll have them... we always have them ready to go.

183

00:40:09.830 --> 00:40:25.440

Mónica Fernández Peñalver: And, same for the data sharing conditions and safeguards that you want to have implemented, not only in policies, but also in contracts. Here on the right, we have the example contract topics that were already shown before.

184

00:40:25.440 --> 00:40:45.470

Mónica Fernández Peñalver: So you want to mention what data is covered, what are exactly the rights of the users, things around data quality and liability, and even, making reference to personal data and, and GDPR, because it's important to know that if,

185

00:40:45.470 --> 00:41:06.659

Mónica Fernández Peñalver: if the generated data from your connected products, if it's considered personal data, you would still have to adhere to the GDPR, and you want to navigate both adequately, both in reality, when it comes to sharing the data with the user or with third parties.

186

00:41:06.660 --> 00:41:11.480

Mónica Fernández Peñalver: And also, Within the contract terms.

187

00:41:15.580 --> 00:41:21.460

Bas Overtoom: Okay, thank you, that was, that was great. So, I think that is all things, and as you just mentioned, yeah.

188

00:41:21.560 --> 00:41:38.930

Bas Overtoom: It is, of course, you need to tailor it a little bit to your specific organization, and so what we have on the shelves on these kind of things, they are not directly there. It's still a project to tailor it to your organization, but you don't have to start with a kind of an empty sheet, and that makes really a difference.

189

00:41:39.050 --> 00:41:57.290

Bas Overtoom: In speed. So, maybe just to kind of summarize, the key success factors, first it is understanding the obligation, and the second thing is to get really the clarity on the data that needs to be shared, then

190

00:41:57.690 --> 00:42:10.339

Bas Overtoom: focusing on those agreements, and then looking into the technical implementation and processes. And that are basically the main, main key elements when it comes about getting the Data Act under control.

191

00:42:11.630 --> 00:42:18.590

Bas Overtoom: this is basically, yeah, let's say, that, that over time, I think we mentioned already a little bit,

192

00:42:19.310 --> 00:42:37.160

Bas Overtoom: give the example of a client case of the different steps that we are doing, and these are the kind of the first key steps in there. So we're really coming almost to an end of this presentation, and then we go into all the questions and answers. In the meantime, people have been asking quite a bit already.

193

00:42:37.160 --> 00:42:45.019

Bas Overtoom: So, please start typing in your questions that you have. We have 10 more minutes to go into it.

194

00:42:45.020 --> 00:43:07.609

Bas Overtoom: One thing I wanted to offer is a call with a data expert, a person like Monica, to work, actually, in an hour session, maybe on specific questions that you have, but also to do a bit of the scoping, if necessary, using some of these accelerators to kind of get a view of what's ahead, so...

195

00:43:07.610 --> 00:43:27.380

Bas Overtoom: if you really want to kind of make progress, then please make use of this, this offer, and have a detailed conversation with us. We love to, to help you further on the journey. So, click the thing, and then, come, come into the, into the list, and we'll contact you.

196

00:43:27.380 --> 00:43:33.949

Bas Overtoom: Then, I think also good to follow us on LinkedIn, be aware that we also

197

00:43:34.110 --> 00:43:58.609

Bas Overtoom: published quite a bit on the Data Act. Monica also wrote, I think, a beautiful Insight that you can also download for free from our website on Insights that is really going into the details of the Data Act and how it's reshaping the IoT economy. There's different accelerators also available on the website, on Data Act and other things, so please have a look out there. We're one of the global thought leaders on the

198

00:43:58.610 --> 00:44:04.900

Bas Overtoom: topic, so a lot of good content available. So that's all with the commercials.

199

00:44:04.900 --> 00:44:11.990

Bas Overtoom: Let's, get going with the, questions and answers.

200

00:44:12.130 --> 00:44:22.990

Bas Overtoom: So, and before that, I think what I promised you is, how can I say it? I'm trying to stop sharing in the meantime.

201

00:44:23.300 --> 00:44:38.969

Bas Overtoom: is what I promised you is an overview of the results, so I'm going to start off with that, while you are having the opportunity to type away your questions. But when you're looking into the, kind of, the question and answer, the...

202

00:44:39.370 --> 00:44:49.349

Bas Overtoom: the poll, then we see that there is actually still quite a group in this call, here with more than 100 people.

203

00:44:49.350 --> 00:45:05.299

Bas Overtoom: registered that, haven't started, with the, data actors. So 40% of the group here, approximately, is not started. 30% says that we haven't started, 10% of them, so additionally.

204

00:45:05.300 --> 00:45:13.539

Bas Overtoom: 10% said, yeah, actually, I'm not really sure what it is. So, basically, just for the first review.

205

00:45:13.960 --> 00:45:15.160

Bas Overtoom: Then...

206

00:45:15.170 --> 00:45:27.749

Bas Overtoom: almost 20% of you say, hey, we are assessing the scope and the obligation, so really in the first step. So I think that's... that's actually an excellent moment to kind of

207

00:45:27.750 --> 00:45:40.550

Bas Overtoom: Yeah, deep dive with us and see how we can help you to accelerate on that journey. And then another 20% say, hey, we're in the busy... busyness with implementing, and we have started to work on it.

208

00:45:40.550 --> 00:46:00.059

Bas Overtoom: And then there's about 10% that say, we're almost done, a few gaps remaining, and there's 10%, and I'm summarizing here the numbers a little bit, that says, hey, we are already implemented, we are, let's say, in a continuous improvement and monitoring phase. So, congratulations to you, you know who you are.

209

00:46:00.060 --> 00:46:02.560

Bas Overtoom: So, that's great.

210

00:46:02.730 --> 00:46:09.510

Bas Overtoom: Okay, that were the results. Yeah, maybe just going into it,

211

00:46:10.310 --> 00:46:23.170

Bas Overtoom: I think the first question I can answer, and then the second question I will give to Monica, the first question is, can a service provider still use data to kind of generate insights and statistics?

212

00:46:23.170 --> 00:46:46.480

Bas Overtoom: or it is now restricted, so I can answer it, and Monica, give you a floor with the second question to elaborate a little bit on it, but I think the answer is yes, you can still make insights and use data also to kind of improve services. Of course, sometimes you need consent for users, especially there is also requirements on that, that's different regulations, but the Data Act doesn't

213

00:46:46.560 --> 00:47:10.720

Bas Overtoom: stop you to kind of make use of data, or in generating insights that is there. And that is also not data that you need to be sharing then, because the data act that you are sharing is focused, actually, on the user's data. And there comes in the second question, and I'm going to give it to you, Monica. Then the question is, yeah, is there... what the data needs to be shared? Is that just the raw data?

214

00:47:10.720 --> 00:47:21.109

Bas Overtoom: Or is it also aggregated data? Can you elaborate it, give a little bit of insight on, yeah, how do we understand what is then the data that needs to be shared?

215

00:47:28.850 --> 00:47:40.720

Mónica Fernández Peñalver: Yeah, so the Data Act specifies that it's raw data that needs to be shared, so any statistics or aggregated statistics created

216

00:47:40.720 --> 00:47:53.610

Mónica Fernández Peñalver: after, so any processed or enriched data would not fall in scope of the Data Act, so it's the raw data that your products would be generating, say, like.

217

00:47:53.610 --> 00:48:03.479

Mónica Fernández Peñalver: temperature, temp... like, if you have sensors, so temperature, metrics, and... and so on, just,

218

00:48:03.500 --> 00:48:21.190

Mónica Fernández Peñalver: just the raw data and metadata that would be necessary for the interpretation of that data, if it's available. So, perhaps the metadata would, would be, so if you have devices,

219

00:48:21.190 --> 00:48:39.290

Mónica Fernández Peñalver: implemented throughout different locations in a building, then metadata could include data that would allow the user to identify which device are we actually talking about, in which corner of the building is this device

220

00:48:39.290 --> 00:48:46.830

Mónica Fernández Peñalver: whose raw data belongs to. That's... that would be it for what is in scope, Yeah

221

00:48:49.940 --> 00:48:59.209

Mónica Fernández Peñalver: Then, we can go into the third question I see. So, elaborate new connected devices, as in old products.

222

00:48:59.540 --> 00:49:06.549

Mónica Fernández Peñalver: Old products existing in the market today, or new created product devices?

223

00:49:06.580 --> 00:49:12.350

Mónica Fernández Peñalver: So, when we talk about, new connected devices.

224

00:49:12.350 --> 00:49:29.920

Mónica Fernández Peñalver: We talk about, devices or, yeah, connected products that are placed, in the market and also put into service, today. So, if... if there is a contract in place, and this product is

225

00:49:29.920 --> 00:49:38.100

Mónica Fernández Peñalver: is being used and it's being put into service, that would fall in scope, of the Diga Act.

226

00:49:42.190 --> 00:49:46.819

Bas Overtoom: Thank you, Monica. And then, maybe I can pick up the next one. I see...

227

00:49:46.820 --> 00:49:51.890

Mónica Fernández Peñalver: Questions over here, so... Yeah.

228

00:49:52.700 --> 00:49:57.719

Bas Overtoom: Yeah, I can pick up the next one, the contractor term, so the question is.

229

00:49:57.740 --> 00:50:07.749

Bas Overtoom: Yeah, is it allowed to have those regulations in the contract terms, or does it really need to be in the actual contracts? Now, I think the good news is that you can also

230

00:50:07.750 --> 00:50:22.529

Bas Overtoom: use terms and conditions and policies as a way to kind of ride out your new, updates on Data Act and data delivery in those terms and conditions, but of course.

231

00:50:22.530 --> 00:50:37.439

Bas Overtoom: you need to have, maybe you need to have contracts that are referenced under these terms and conditions, or you need to have an agreement with users that terms and conditions are updated. Now, yeah, maybe you have existing processes for it, and sometimes it's one-sided.

232

00:50:37.440 --> 00:50:47.989

Bas Overtoom: But I think there is some... so you can leverage your, let's say, all the legal ways to kind of make agreements here to also get this on there. There needs to not be

233

00:50:47.990 --> 00:50:58.800

Bas Overtoom: specific, let's say, contracts between... for every user, and the thing. It could be part of the, let's say, the terms and conditions in which you provide your contract.

234

00:50:59.930 --> 00:51:05.090

Bas Overtoom: Will you share the PowerPoint? The answer is yes, and

235

00:51:06.440 --> 00:51:15.099

Bas Overtoom: I think that is, that is that. Maybe, Monica, do you see another question here that you want to pick up?

236

00:51:24.470 --> 00:51:42.449

Mónica Fernández Peñalver: Yeah, so I see a question, it says, I can ask... so, the question is, can I ask for my data that I'm sharing here next month unless I understand that the data is gone and destroyed? So...

237

00:51:43.850 --> 00:51:46.350

Mónica Fernández Peñalver: Okay, so...

238

00:51:46.720 --> 00:52:06.419

Mónica Fernández Peñalver: if you refer to the data that, you are placing here in this chat, that kind of doesn't, that doesn't really cover it by the Data Act, that would be covered by privacy, by the GDPR privacy regulations, if we were to store your data, which we don't. So...

239

00:52:06.420 --> 00:52:12.090

Mónica Fernández Peñalver: Yeah, but in Data Act terms, If you're...

240

00:52:12.190 --> 00:52:30.820

Mónica Fernández Peñalver: connected product produces data, for a period of time, let's say for two... for two months, and then in a year's time, this data is deleted by the data holder, they don't have access to it, then, then you cannot have access to

241

00:52:30.820 --> 00:52:39.260

Mónica Fernández Peñalver: to this data if it's not available to them. So, I hope that answers the question within the Data Act context.

242

00:52:39.430 --> 00:52:57.860

Mónica Fernández Peñalver: And I saw that, it's a computer an IoT-connected device, yes, same as... same as your phone. So, if you think about it, when we talk about, data generated... generated by these connected, devices.

243

00:52:57.950 --> 00:53:12.710

Mónica Fernández Peñalver: in the context of the phone, for example, your, your screen time would be data that can, that under the Data Act is obligatory to, to, to be available to you. I mean, we all know that,

244

00:53:12.710 --> 00:53:19.650

Mónica Fernández Peñalver: For most phones, you can already access data about your screen time, but that's a typical example.

245

00:53:19.650 --> 00:53:24.390

Mónica Fernández Peñalver: If you are considering,

246

00:53:24.970 --> 00:53:38.280

Mónica Fernández Peñalver: your data within certain apps, app providers, then, the app itself is not, a related service of the connected product.

247

00:53:38.280 --> 00:53:46.389

Mónica Fernández Peñalver: So, yeah, the app Instagram wouldn't be the related service of.

248

00:53:46.390 --> 00:54:04.200

Mónica Fernández Peñalver: of the phone itself, so that falls outside of scope of what the Data Act is trying to regulate, then your data is regulated, of course, by other regulations, and you would probably have access to the data that you generate through that app.

249

00:54:04.200 --> 00:54:09.189

Mónica Fernández Peñalver: But not by, the Data Act itself, which...

250

00:54:09.210 --> 00:54:16.140

Mónica Fernández Peñalver: Governed, physical, connected devices and its, related services.

251

00:54:17.420 --> 00:54:35.630

Mónica Fernández Peñalver: And I think with that, we finished, answering the questions. Of course, if there are more, feel free to contact us, and you can also reach out to me directly, but, yeah, I'll give the flow back to you, Bas...

252

00:54:36.650 --> 00:54:47.579

Bas Overtoom: Yeah, and I think we almost used the whole hour, so it's good to round off. Two points I wanted to make, just based on the last questions, and also the reflections that you brought in there.

253

00:54:47.580 --> 00:55:11.669

Bas Overtoom: the difference between GDPR and Data Act, I think, is something to be aware of. Don't confuse them. So, that is also something we can help with, but one is really about data sharing for the product, the other is about, yeah, protecting the privacy of individuals or human beings, so, but, sometimes, yeah, we are looking,

254

00:55:11.670 --> 00:55:26.149

Bas Overtoom: at both of them. So, don't get confused between those two. And the other thing I wanted to mention is, now I kind of forget it, I wanted to mention something

255

00:55:29.540 --> 00:55:35.049

Bas Overtoom: No, I just... it just slipped out of my mind, so I have to, have to apologize.

256

00:55:35.690 --> 00:55:44.320

Bas Overtoom: Then we will just round off, and I hope this was quite insightful. There's many things to talk about,

257

00:55:44.710 --> 00:56:09.570

Bas Overtoom: So, please, if you are busy with the Data Act, and most of you are, and you feel you want a little bit of help to kind of go further and quicker on that journey, then please be... feel free. The slides and everything are available if you are going to go back to this link. There will be an email sent on that, and I think then you can review also all the things below.

258

00:56:09.570 --> 00:56:16.130

Bas Overtoom: been shared. So, with that, wish you a beautiful day, and we speak soon.