



University of  
**Southampton**

# Technological Challenges of the DGA

and GDPR, Data Act, AI Act...

George Konstantinidis

New Approaches towards Compliance for AI/Data  
Operations  
SINTEF, Oslo  
Jan 2025

# Data Governance Act

Effective on June 22, Applicable on Sep 23

Facilitate the sharing and reuse of data across the EU by

- creating a framework for data intermediaries,
- establishing safeguards for data sharing,
- and promoting the use of public–sector data for innovation.

Position: lack of incentives to participate in data sharing is the absence of ‘trust’.

# This talk is **not** about: Data Intermediaries vs Data Marketplaces

- Some data service providers want to sell data on their own
  - DGA advocates neutrality of DISPs, requires the legal separation of data intermediation and processing
- DISPs selling models instead of raw data?
  - processing data to train such models?
- DISPs offering data visiting rooms?
- DISPs do encrypted processing?
- Pricing?
- Auctions?

This talk is about:

## Re-use of protected data held by public sector bodies

- Commercial data, statistical data, data protected by IP or protected personal data outside GDPR

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Citizen, Startup, SME

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Public Body

Table 3: Salt Concentration and Light Transmittance

Salt Concentration (%)	Transmittance (%)				
	Trial #1	Trial #2	Trial #3	Trial #4	Trial #5
0	77.23	74.50	64.88	75.27	54.65
3	85.23	92.82	78.91	60.71	57.95
6	88.39	100.05	73.66	65.55	64.54
9	80.71	100.05	68.29	64.95	52.96
12	82.66	117.18	71.01	56.95	46.95
15	72.55	115.40	65.72	66.09	55.38

Data

# Re-use of protected data held by public sector bodies

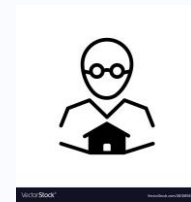
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Citizen, Startup, SME



Public Body



IP holder, Data subject

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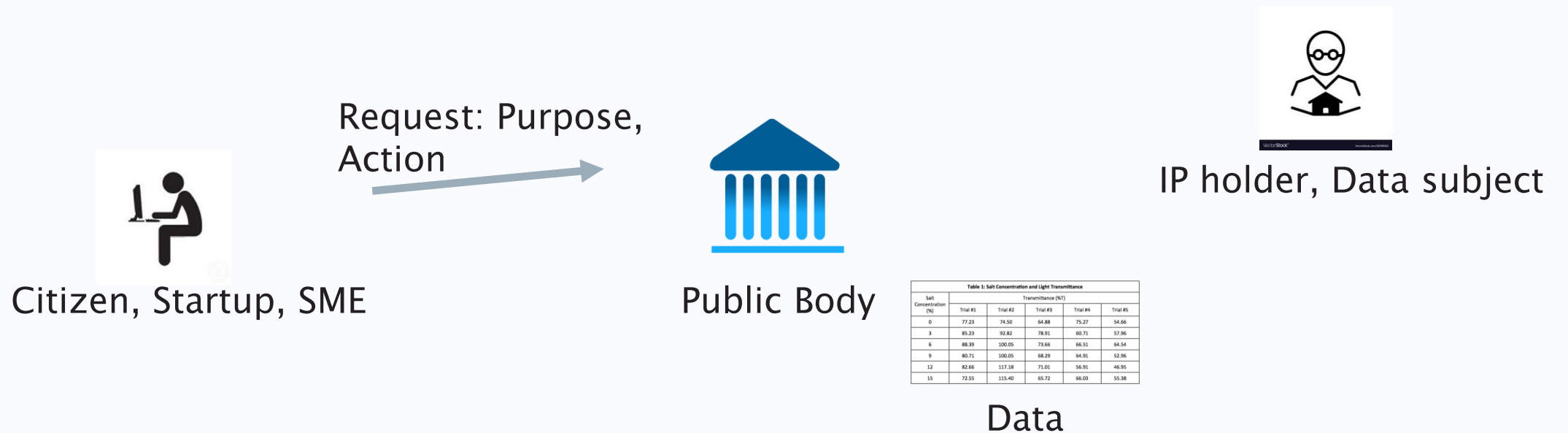
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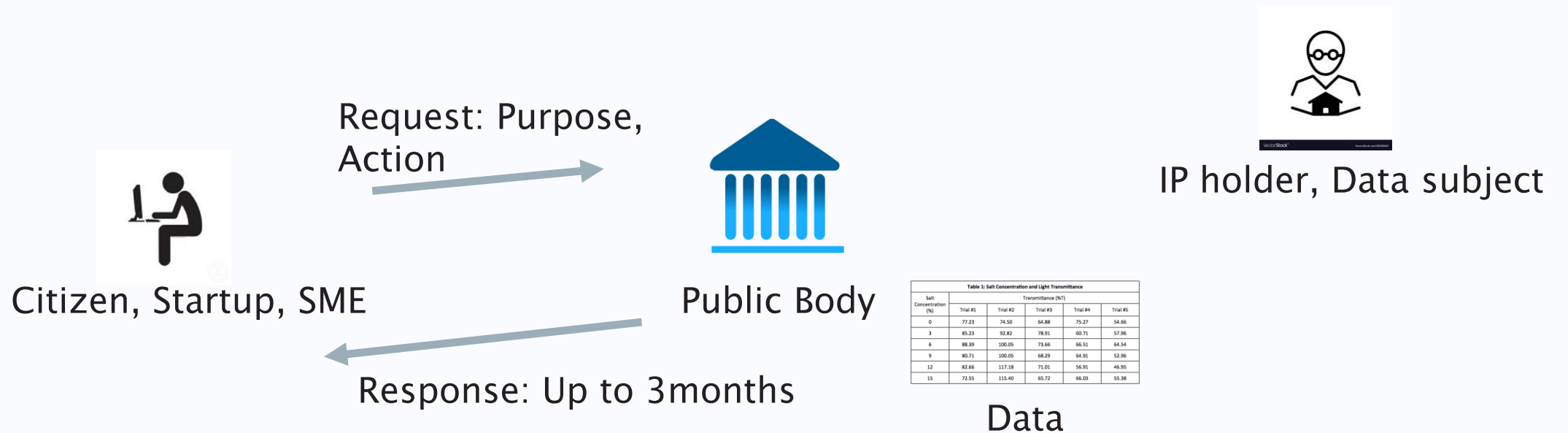
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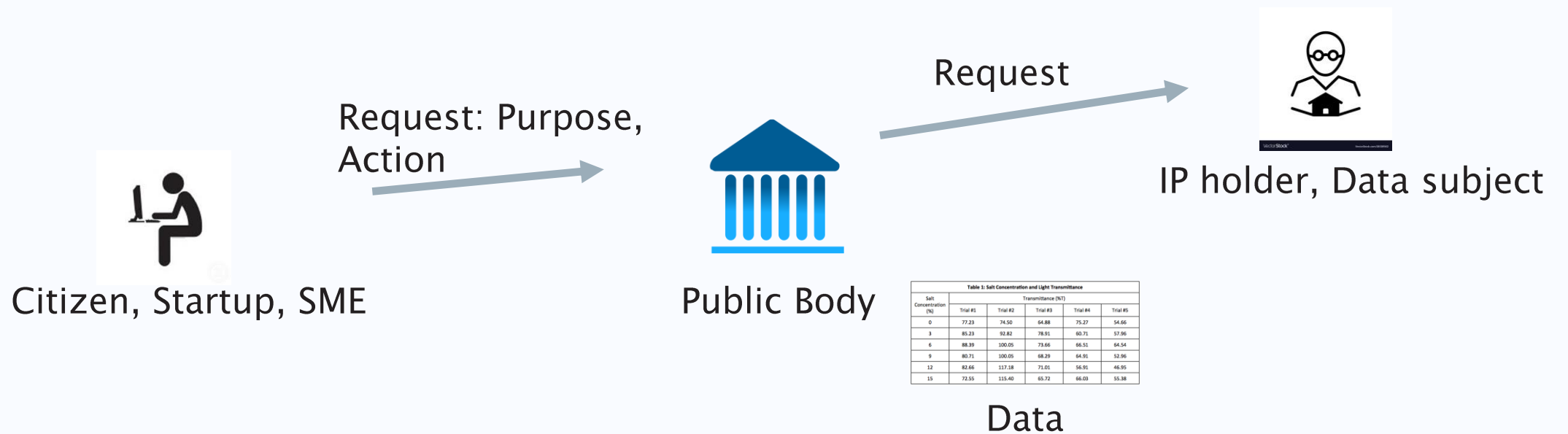
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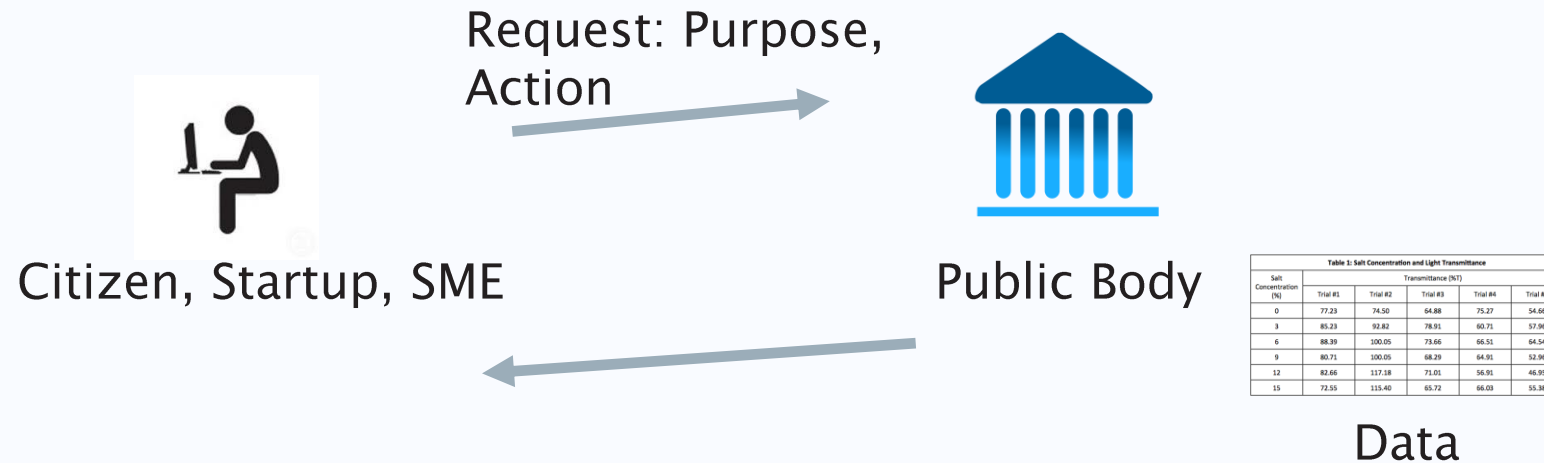
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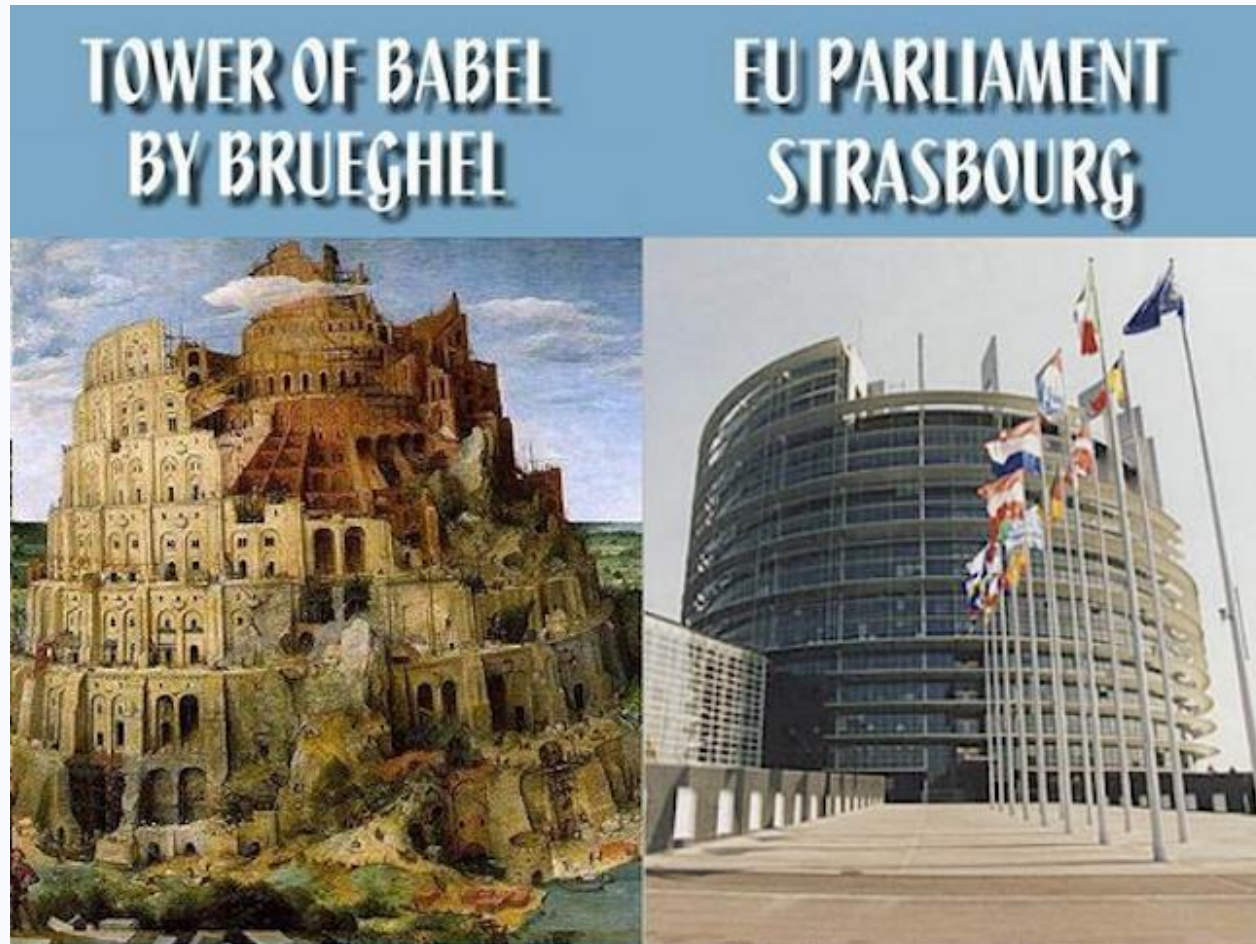
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# Granting Data Reuse

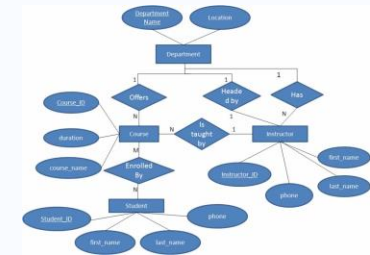
- Purposes of reuse
  - Agree on the same language
  - Non discriminatory, transparent, proportional
- Infrastructure to modify, anonymise, aggregate or any other method of disclosure control
  - Commercially confidential information
  - Trade secrets
  - Intellectual property rights
- Offer a secure processing environment
- Control Access
- Verify processing
- Monitor

Language of data use and reuse, e.g., “Purpose”

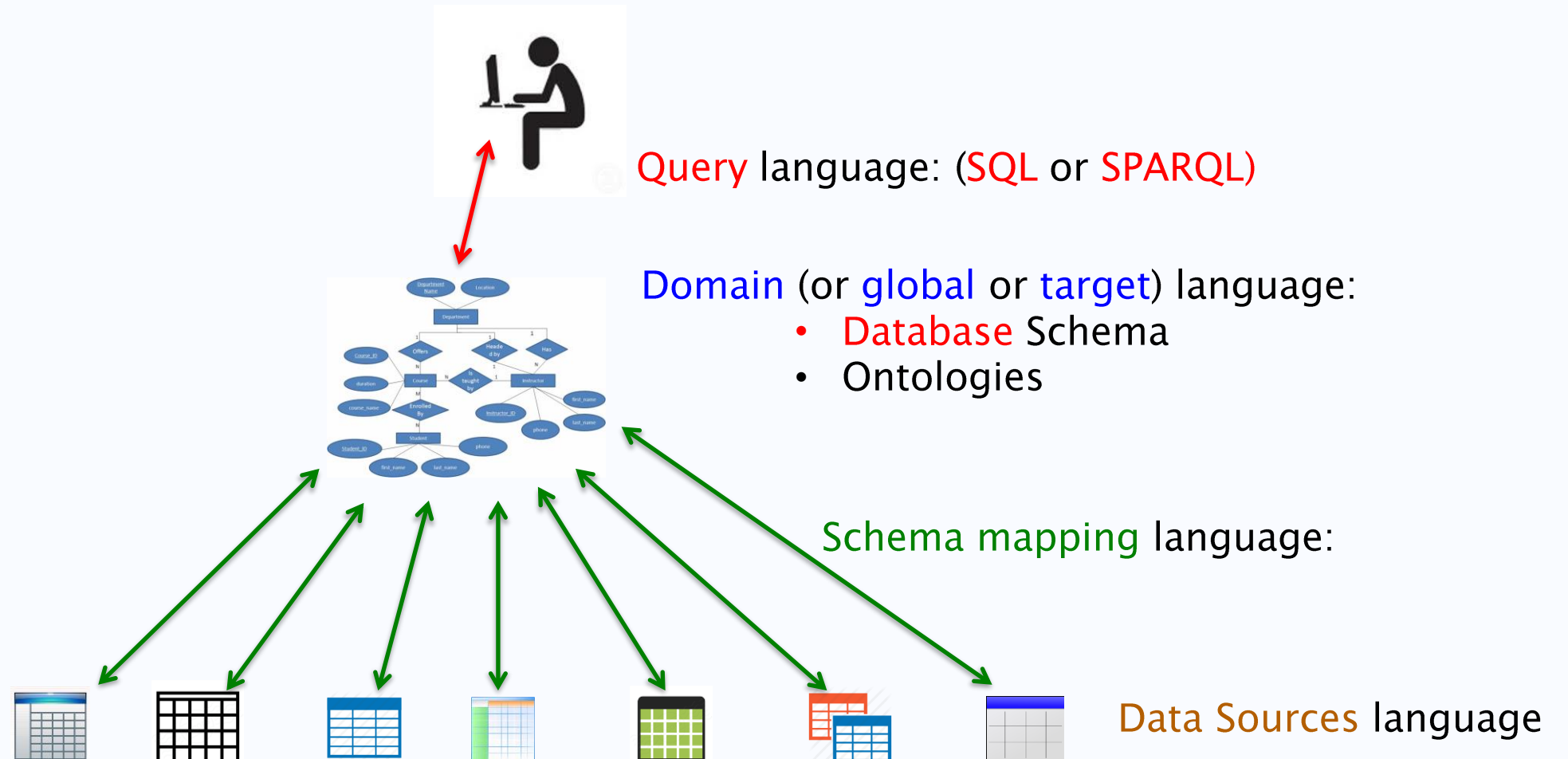


# Purposes, Actions: Knowledge Graphs to the Rescue!

- **High-level**: advertisement, product research/enhancement, service improvement, security, diagnosis, etc.
- **Medium level**: Face recognition, age recognition, ..., ?
- **Low level**: computational statistics, monte carlo simulations, linear regression, feature extraction, neural net training,...
- **Domain-specific**: biomedical techniques, healthcare choices,...



# Logical Information Integration



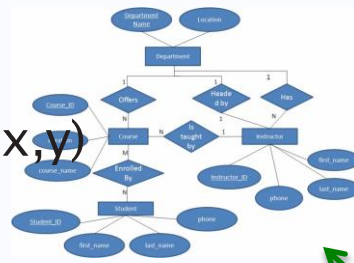
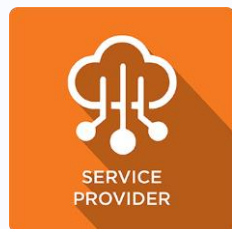


# Integration of **purposes** and **consent**



$N(x) \leftarrow \text{Photo}(x), \text{AgeRecognition}(x,y), y > 50$

$q(y) \leftarrow \text{Photo}(x), \text{AgeRecognition}(x,y)$



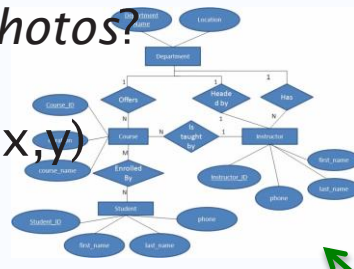
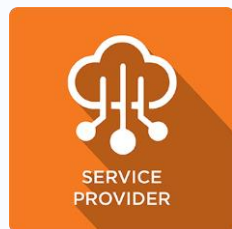
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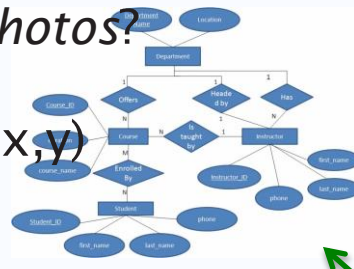
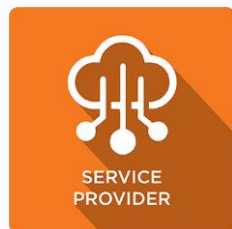


$N(x) \leftarrow \text{Photo}(x), \text{AgeRecognition}(x,y), y > 70$

*Not if I look too old!*

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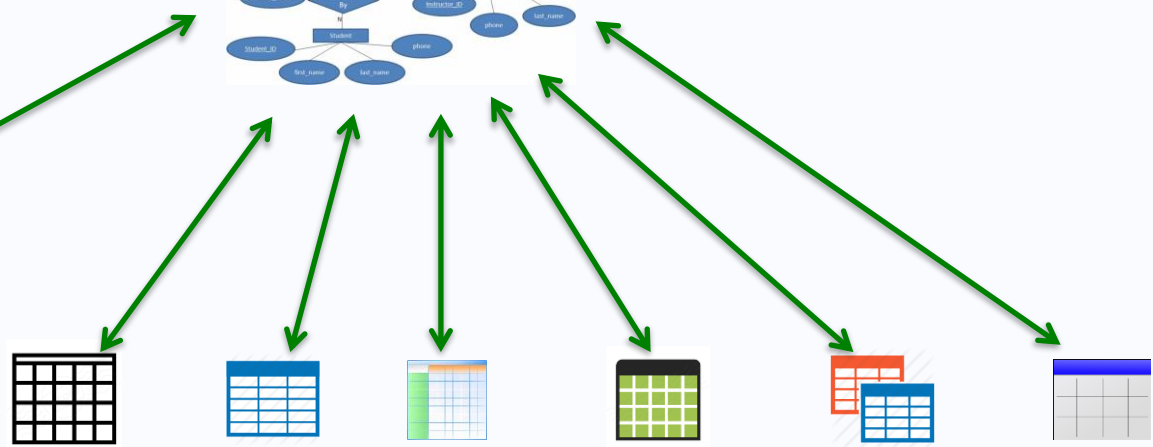
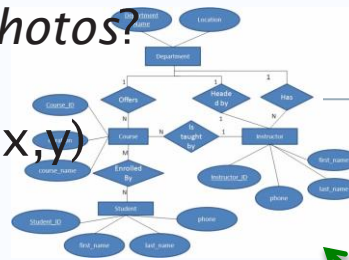
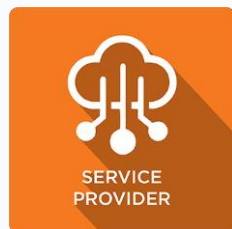
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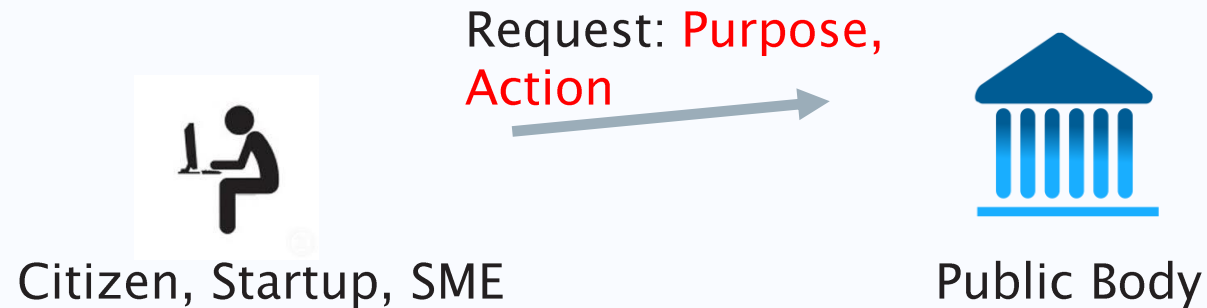
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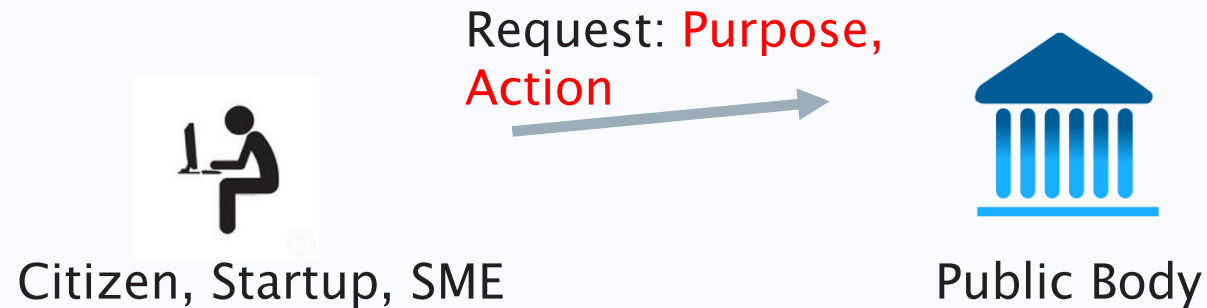
Support For Unforseen Purposes through **Reasoning**



Ok now I know **what you say, but do you mean it?**



Ok now I know **what you say, but do you mean it?**  
And who are you anyway?

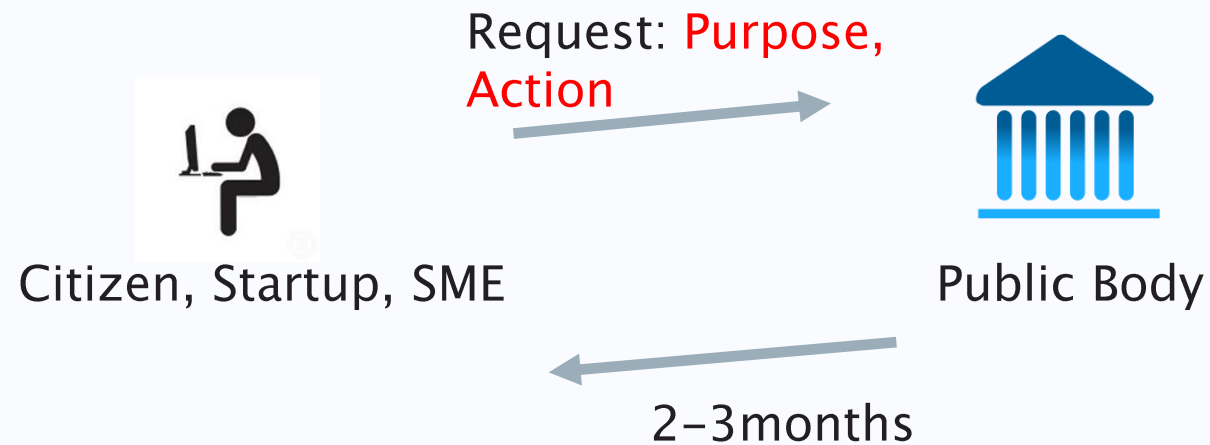


# Trust

- Centralized Trust: Certification
  - Have organizations certify entities for purposes of use
  - You can do that a priori

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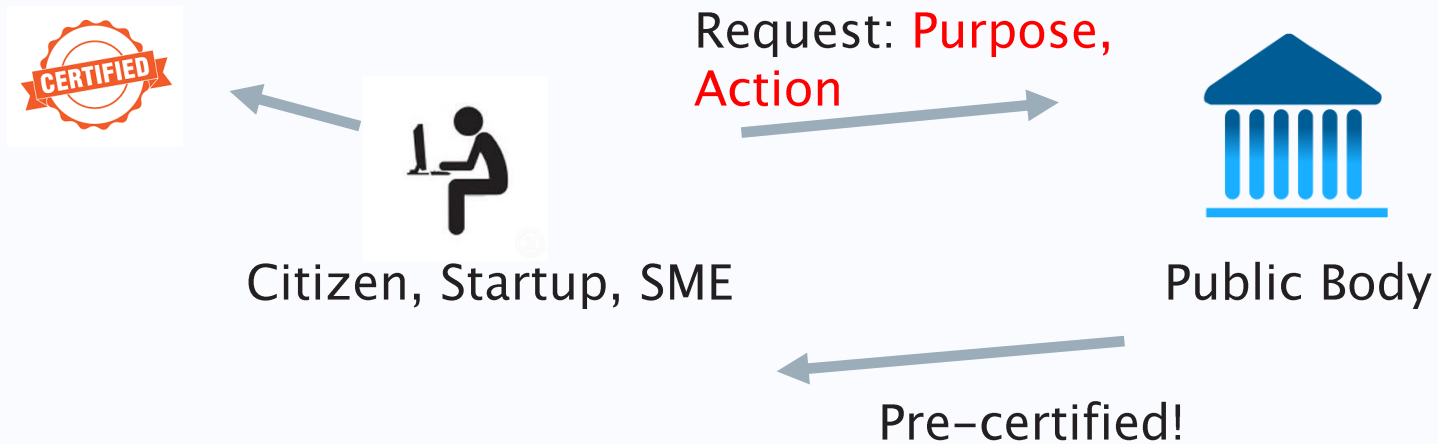
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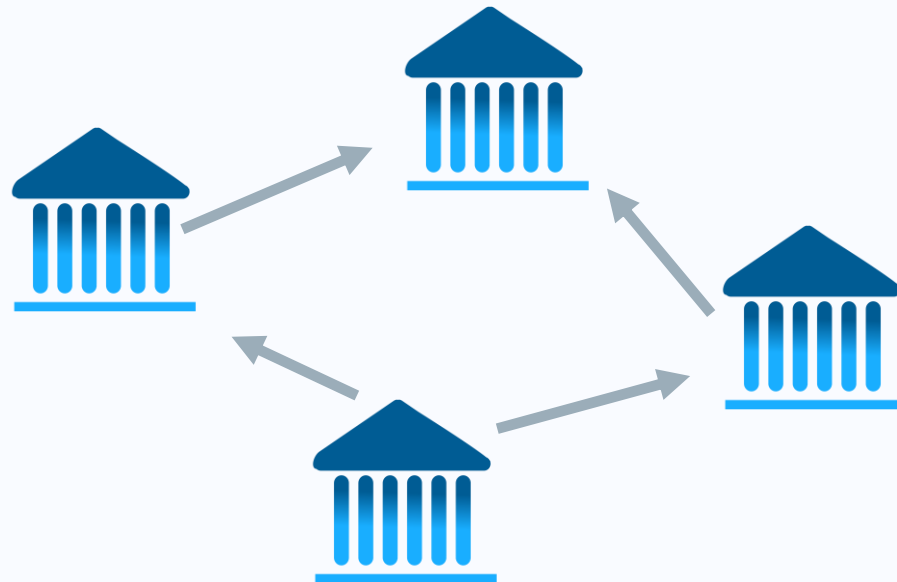


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  - Identity management
  - Verifiable credentials

# Trust

- Centralized Trust: Certification
  - Have organizations certify entities for purposes of use
  - You can do that a priori
  - Identity management
  - Verifiable credentials
- Decentralized Trust

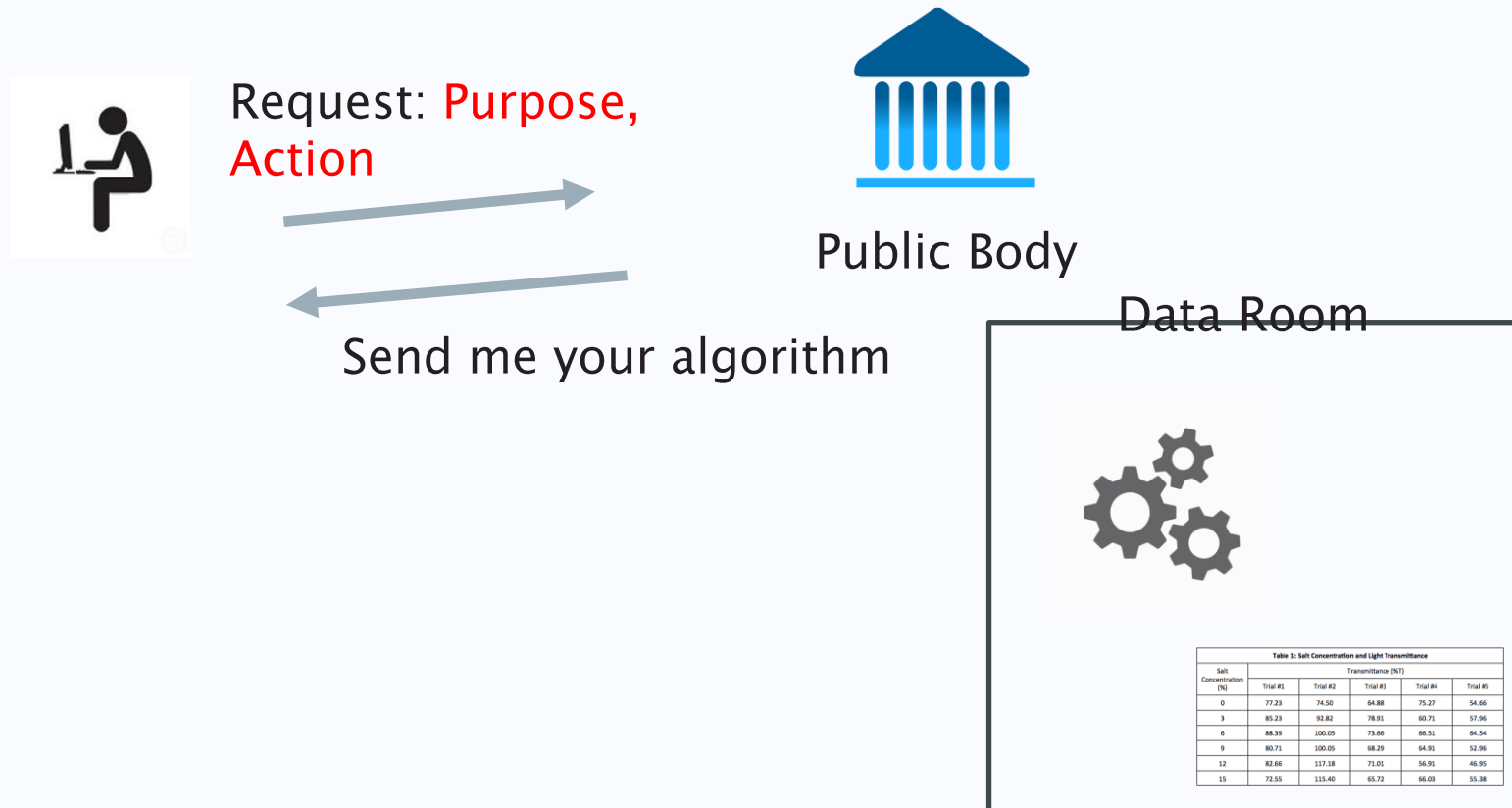


# Secure Processing Environments

- Virtual or Physical
- Fine-grained policies
- Change Management
- Cost

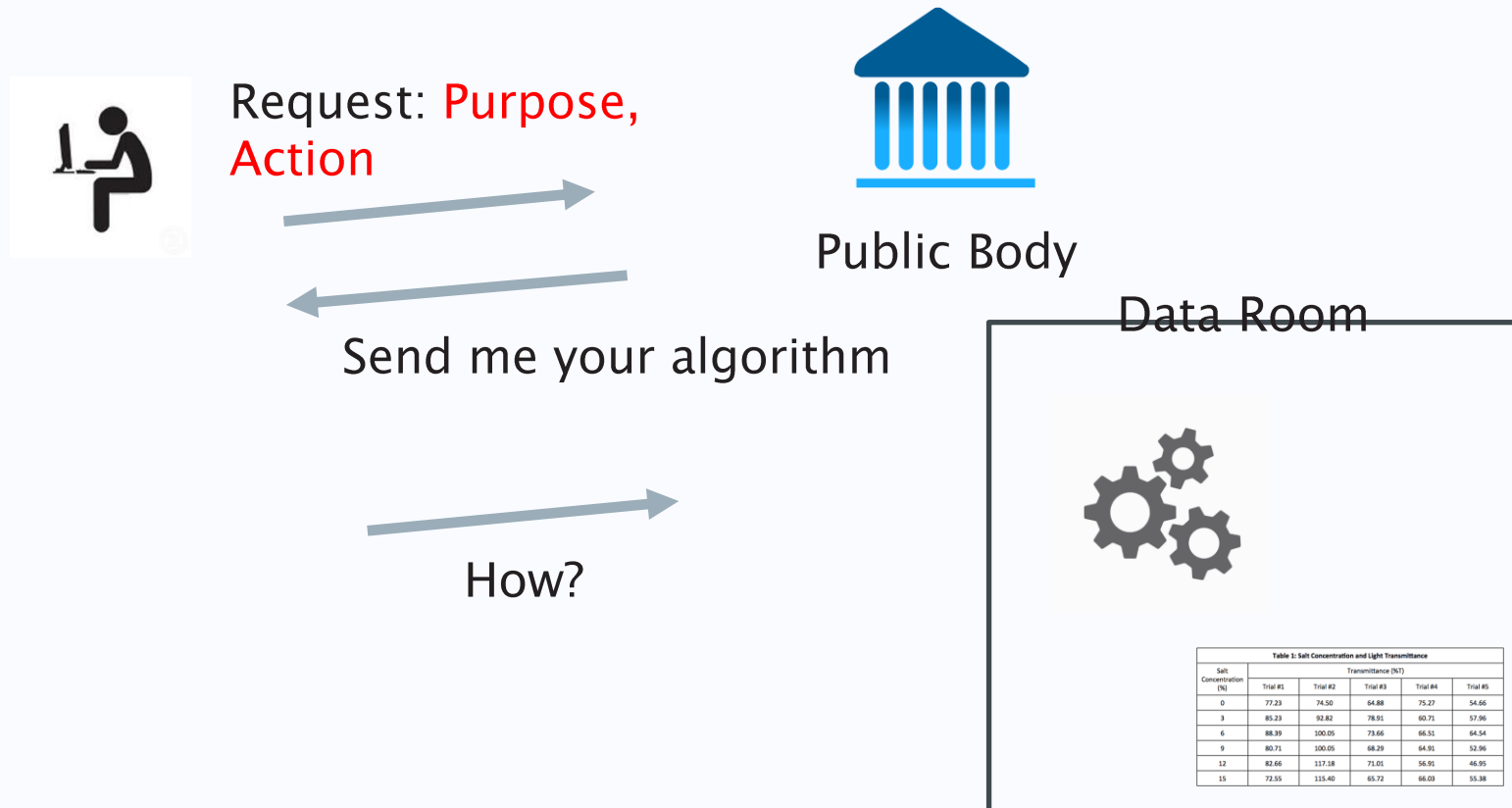
# Secure Processing Environments

- Virtual



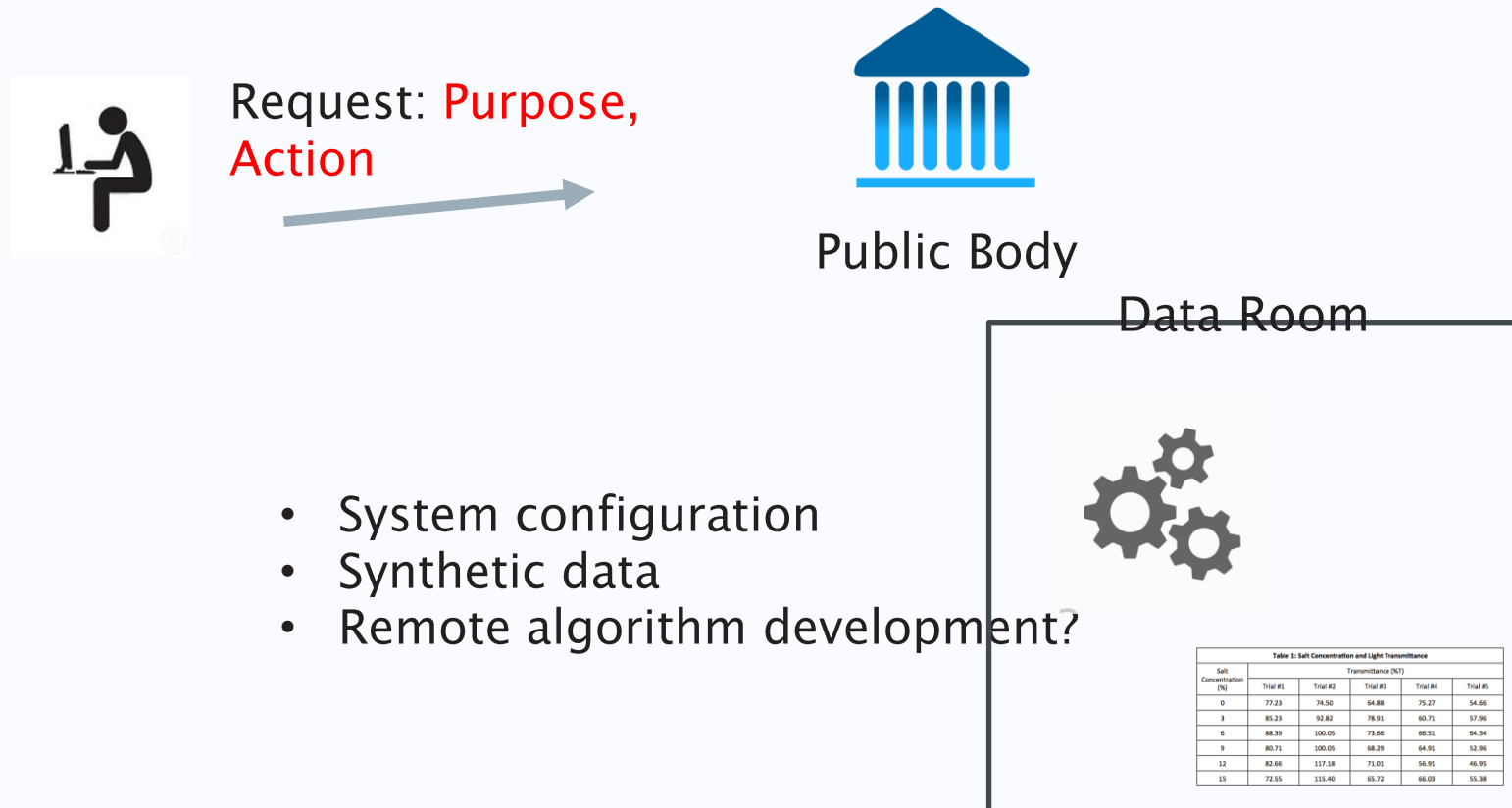
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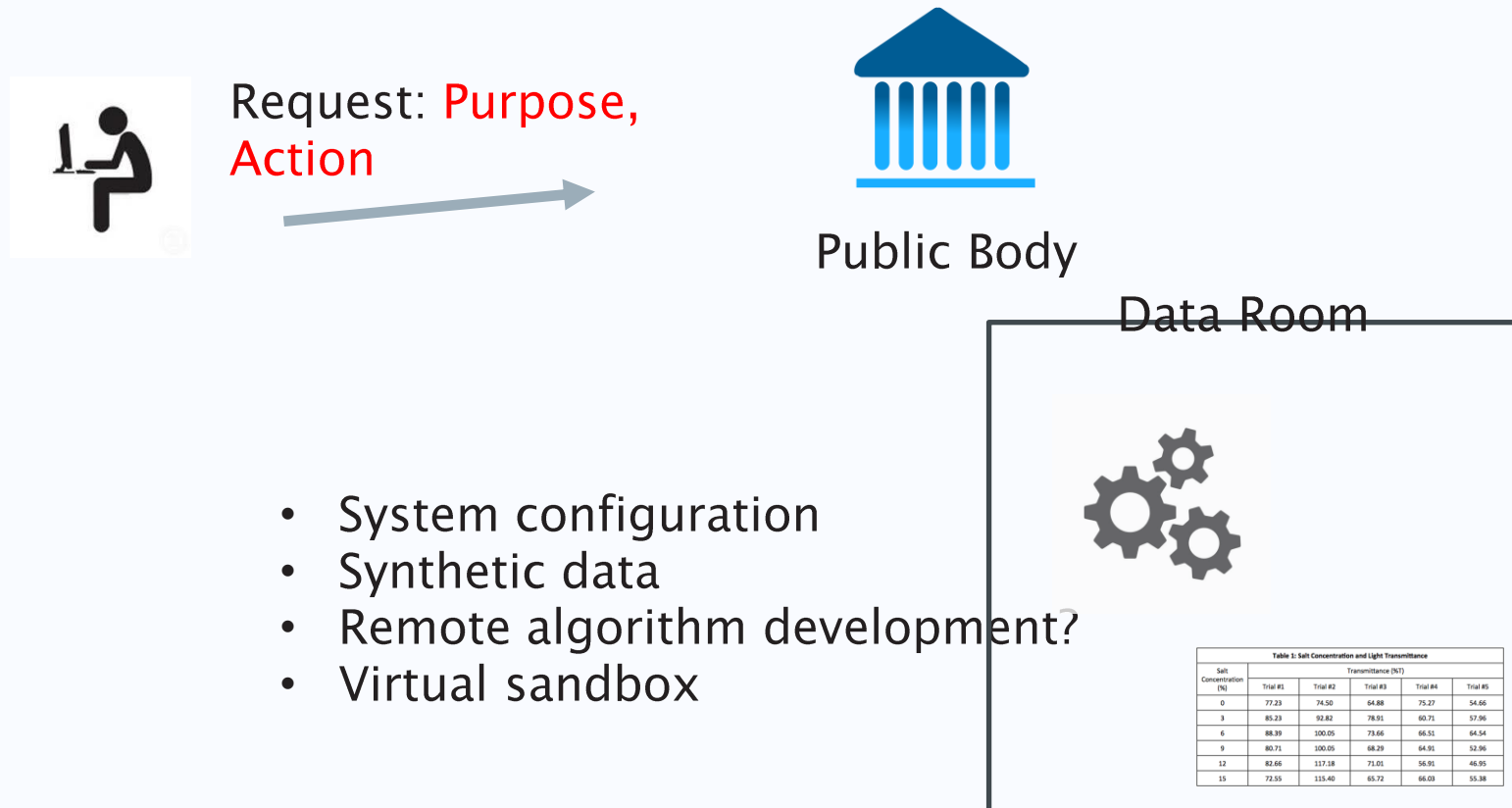
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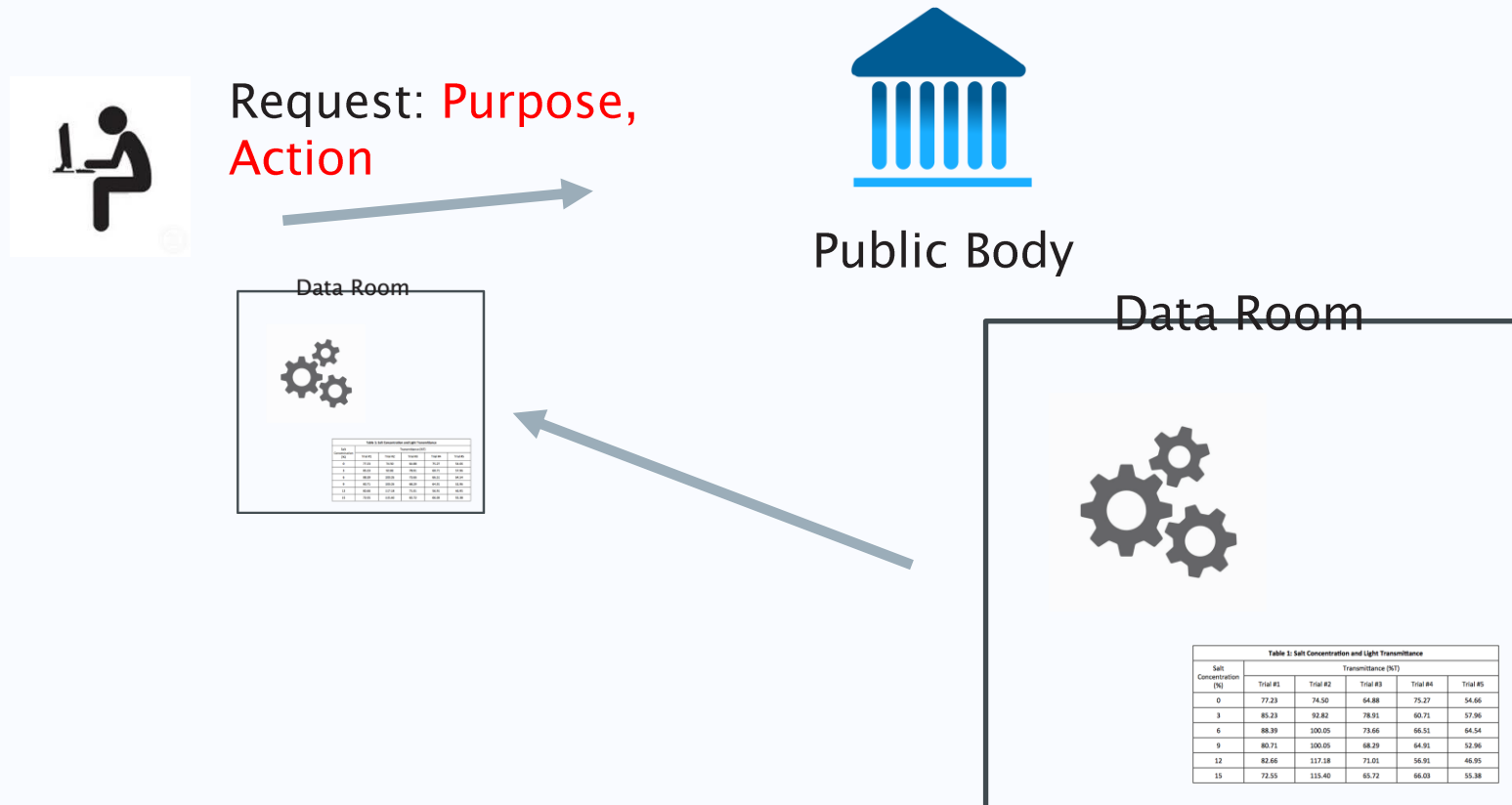
- Virtual





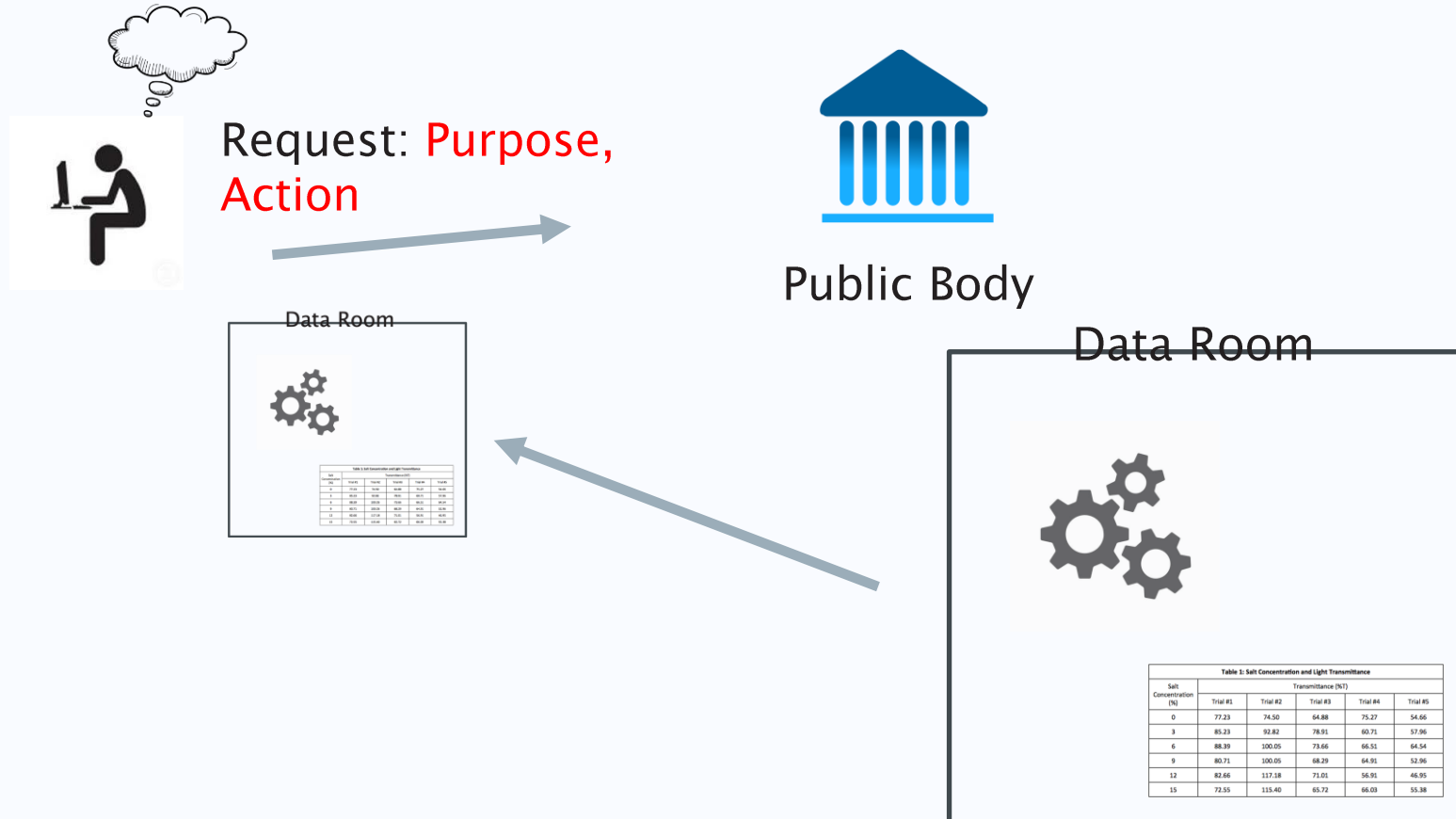
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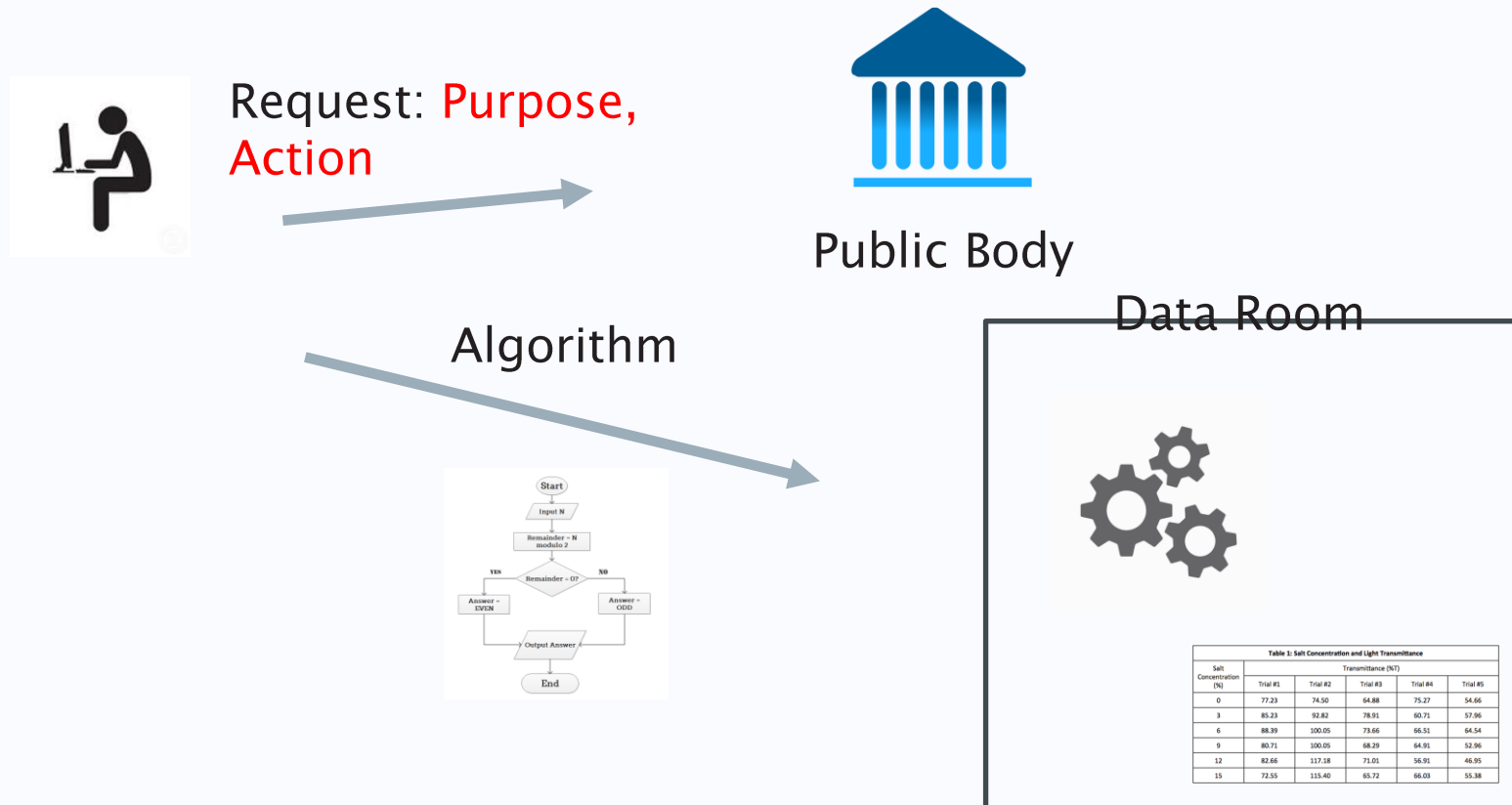
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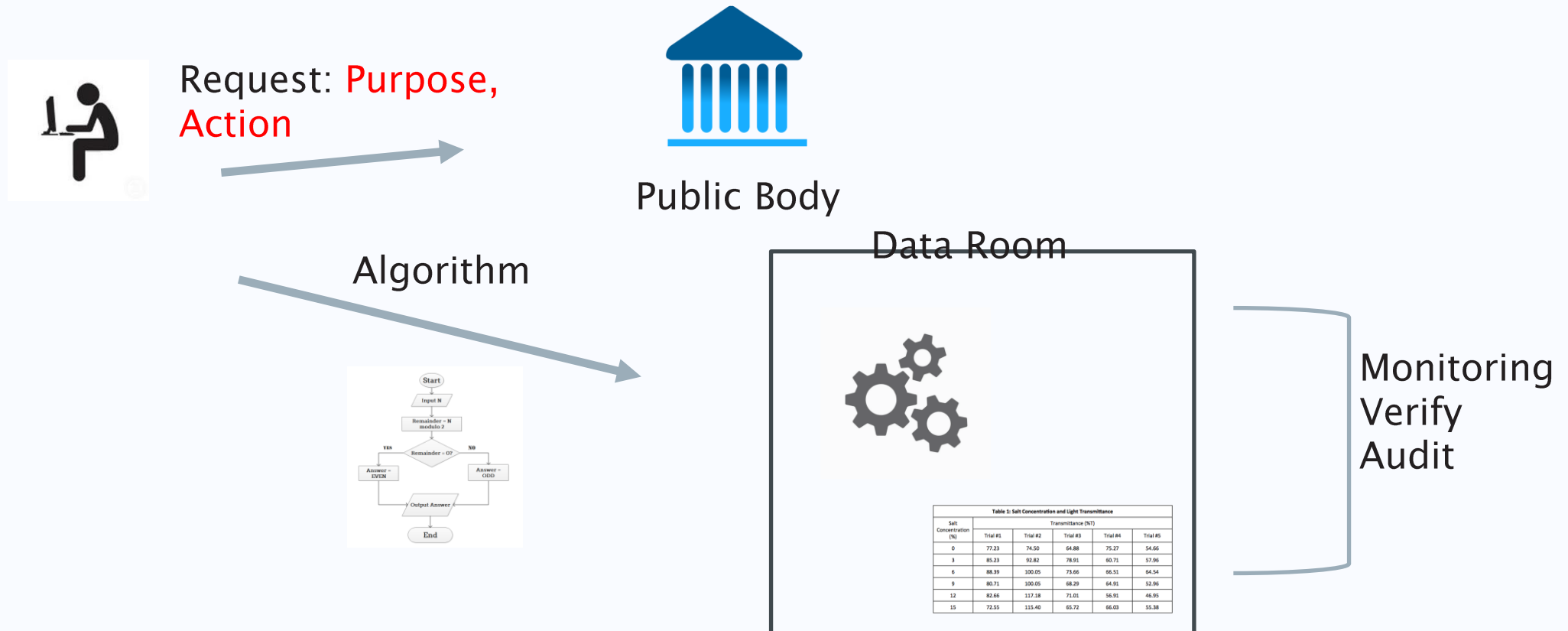
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# How about **protecting** against an ~~adversary~~ a trusted party?

Data to be **released**

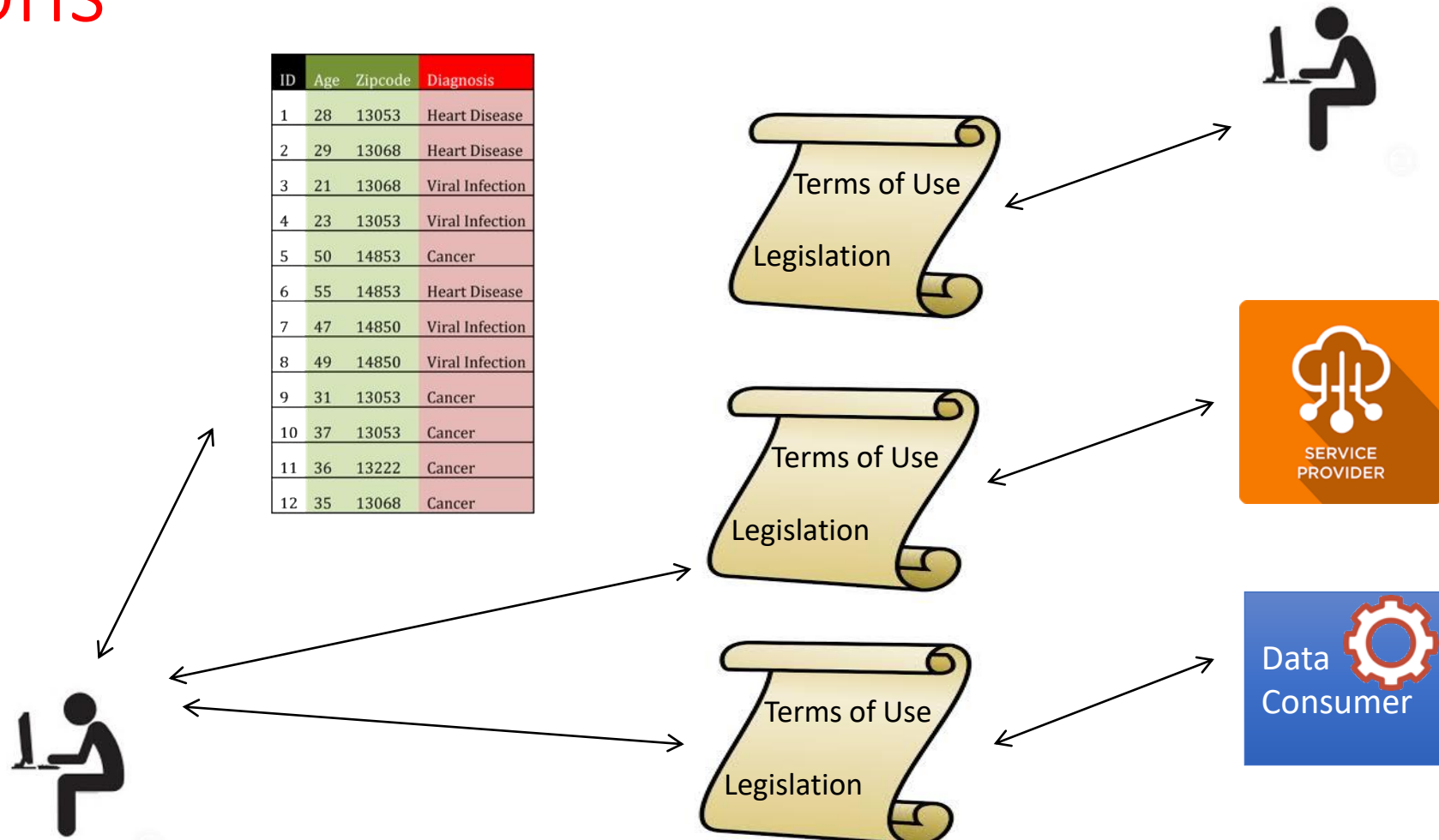
- Data access
- Encryption
- Anonymisation
- Differential Privacy
- ...

ID	Age	Zipcode	Diagnosis
1	28	13053	Heart Disease
2	29	13068	Heart Disease
3	21	13068	Viral Infection
4	23	13053	Viral Infection
5	50	14853	Cancer
6	55	14853	Heart Disease
7	47	14850	Viral Infection
8	49	14850	Viral Infection
9	31	13053	Cancer
10	37	13053	Cancer
11	36	13222	Cancer
12	35	13068	Cancer



Data Owner

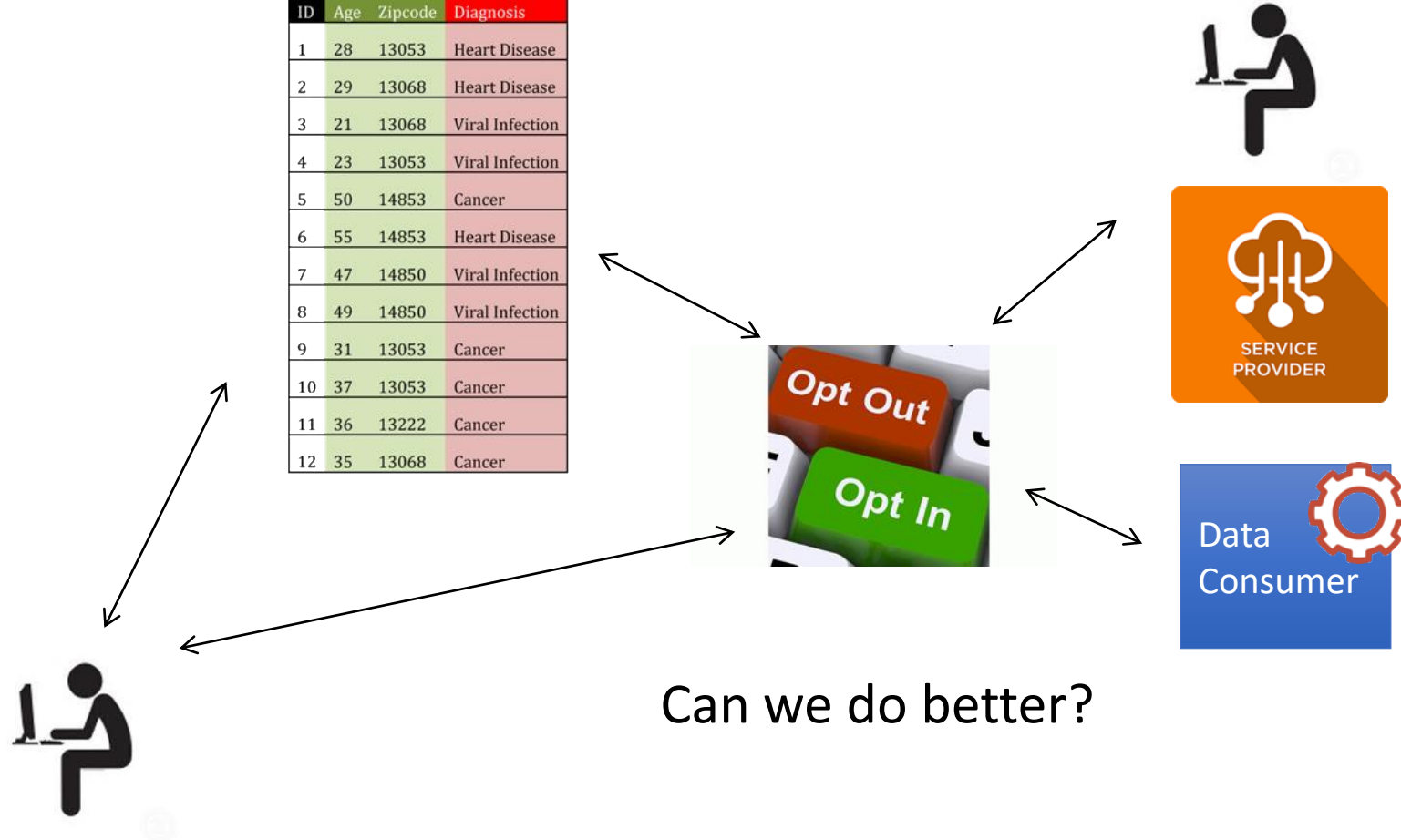
# Data Agreements Currently: Terms and Conditions



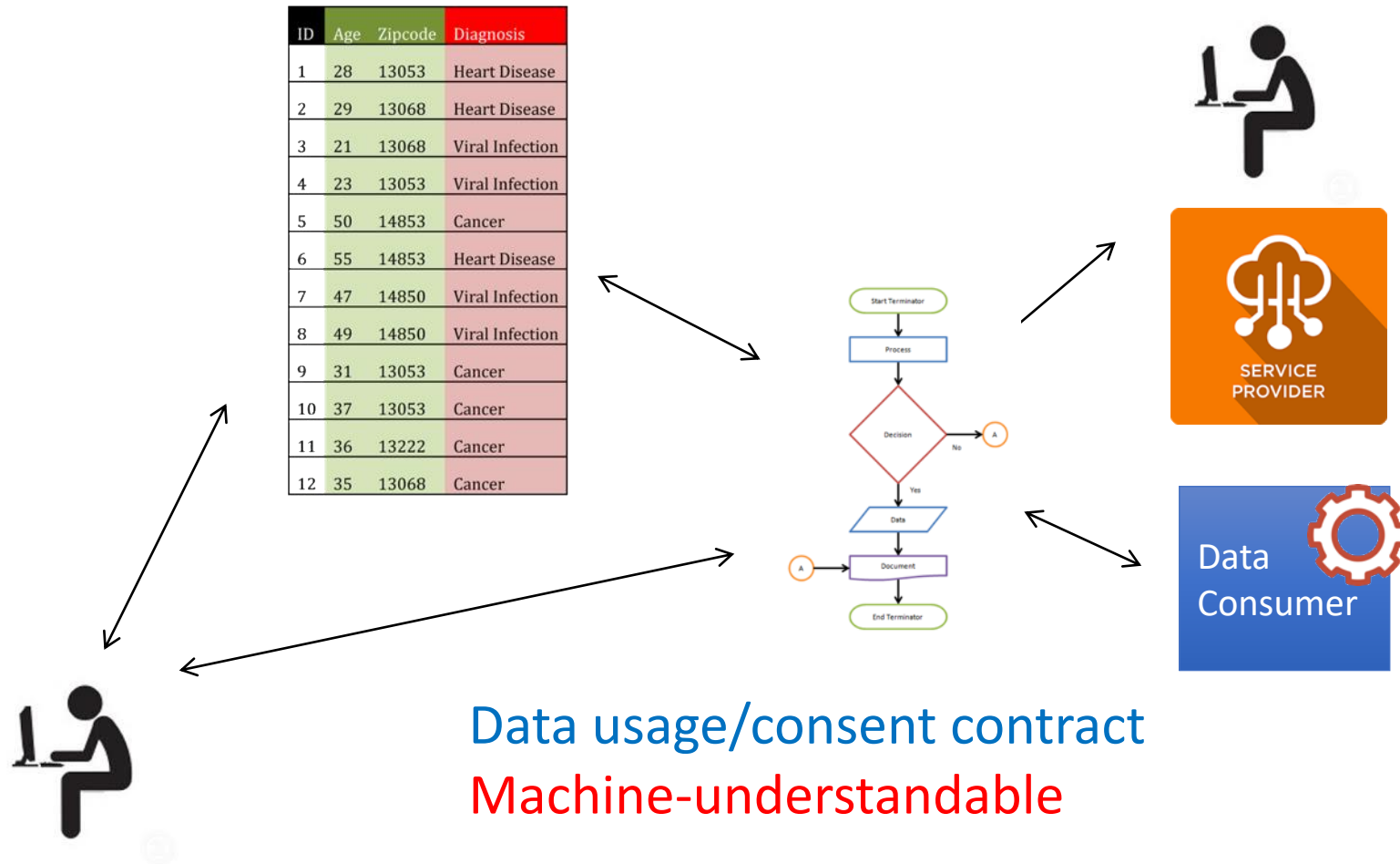
Needs in-house engineers to do an ad-hoc implementation of the terms into code

# Data Agreements Currently: Terms and Conditions

ID	Age	Zipcode	Diagnosis
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2	29	13068	Heart Disease
3	21	13068	Viral Infection
4	23	13053	Viral Infection
5	50	14853	Cancer
6	55	14853	Heart Disease
7	47	14850	Viral Infection
8	49	14850	Viral Infection
9	31	13053	Cancer
10	37	13053	Cancer
11	36	13222	Cancer
12	35	13068	Cancer

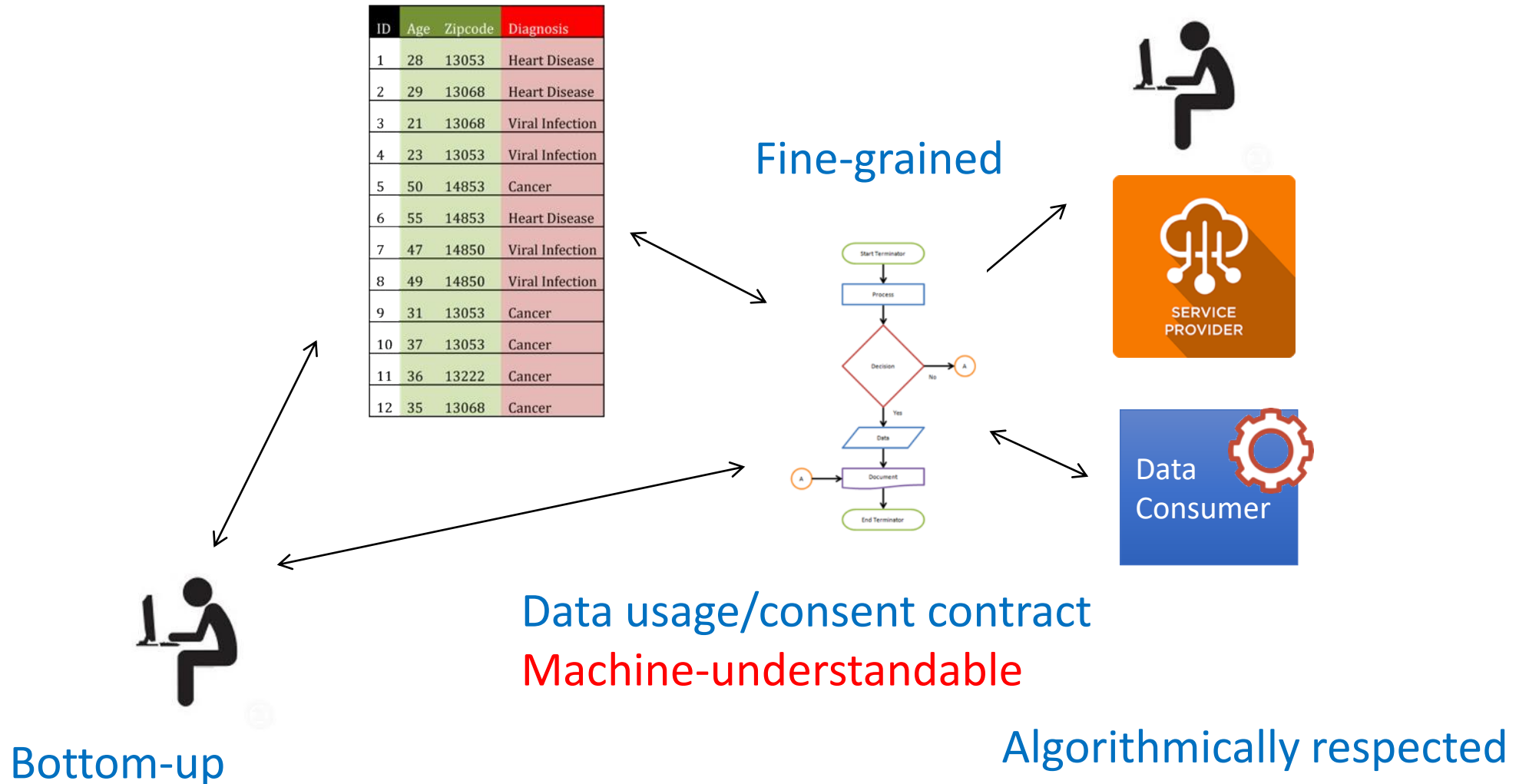


# Collaborative Privacy over released data



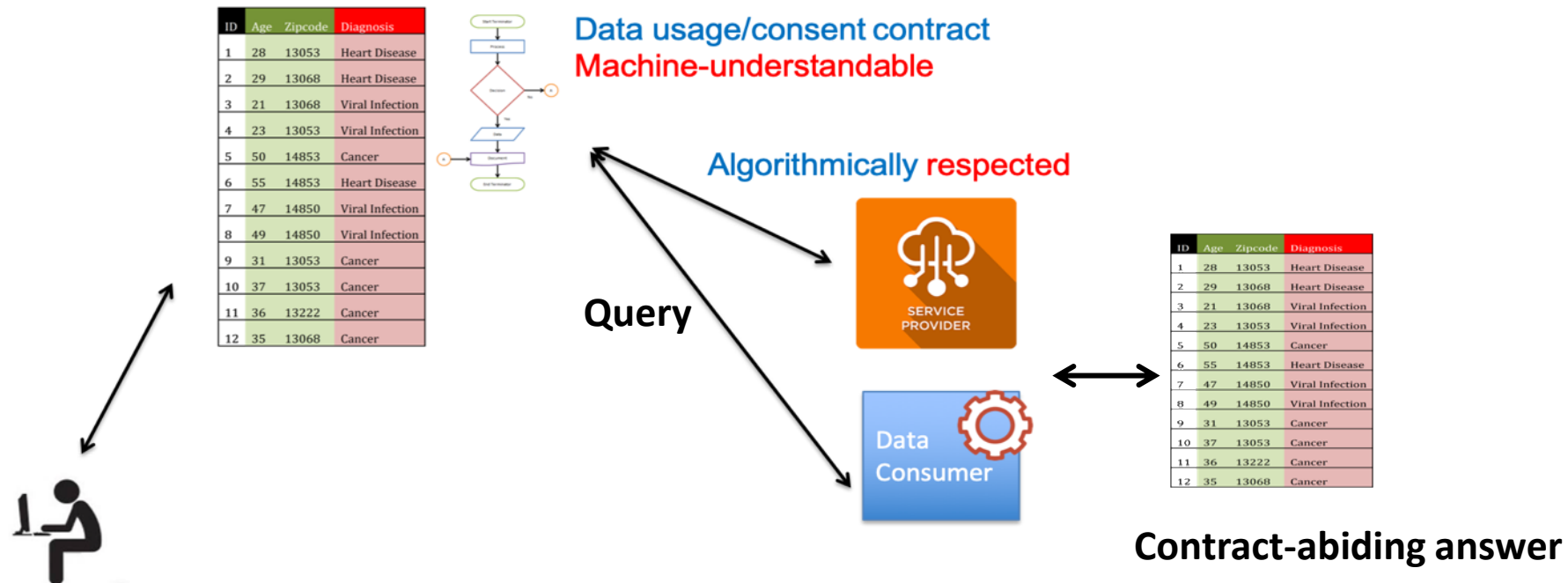


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# Data Sharing Agreements

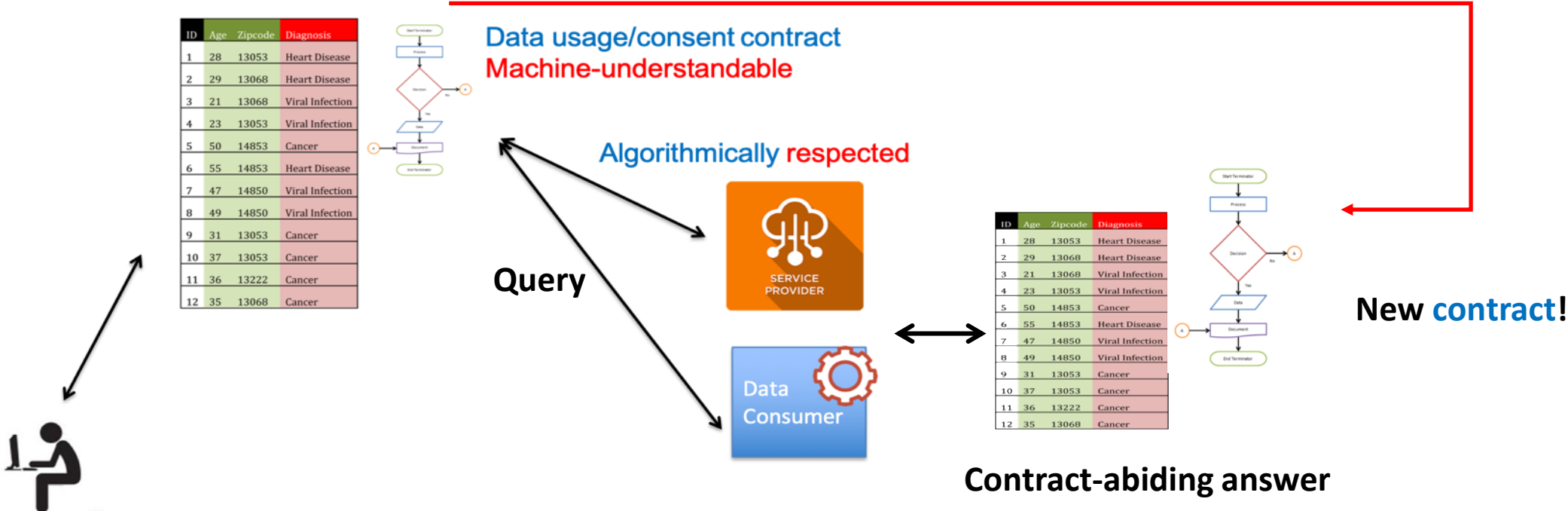
- More contracts **automatically generated** for the processed data



# Data Sharing Agreements

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algorithm



# Data Altruism

- Not enough time!

# YOUR QUESTIONS

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