Insurance Europe response to EC data strategy consultation

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Introduction

Insurance Europe welcomes the opportunity to provide input to the European Commission on its European strategy for data. This position paper is intended to supplement the response provided via the online survey to add greater clarity and context to Insurance Europe's answers.

Executive summary

- Insurance Europe believes that a common EU data strategy would provide a significant opportunity for the EU to adopt a future-proof, innovation-friendly framework that supports data-driven business and enables the digital transformation of society, while ensuring appropriate protection for consumers.

- 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.

- The focus of the data strategy should be on strengthening the framework conditions for data collaboration and data partnerships.

- 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 him or her, eg if a customer decides that an insurance undertaking may access his/her driving data, the vehicle manufacturer should grant access on reasonable terms.

- It will be important to establish a framework on how to exchange data between companies, and how to give customers the possibility to export their data, ensuring appropriate anonymisation of data to protect privacy. This would help to encourage research and development, as well as the creation of anonymised data sources.

- Insurance Europe believes that the general idea behind common European data spaces is to be welcomed. However, much depends on the specific operating model and implementation chosen for the data space. Where possible and feasible, the data should be presented in 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.

- Insurance Europe supports the strategy's aim that sector-specific legislation on data-sharing should only be introduced when there are identified market failures.

- It is crucial to have a data strategy at the European level that allows the benefits of data usage to be maximised, while at the same time protecting and respecting users' rights.

Section 1: General questions on the data strategy

Do you agree that the European Union needs an overarching data strategy to enable the digital transformation of the society?

Yes.

Additional supporting text

Insurance Europe believes that a common EU data strategy would provide a significant opportunity for the EU to adopt a future-proof, innovation-friendly framework that supports data-driven business and enables the digital transformation of society, while at the same time ensuring appropriate protection of consumers and ethical standards.

The development of an EU data strategy should not only take into account the data of individuals, but also the data held by private companies and the public sector, facilitating access to and use of data to drive innovation and better serve society, eg to make sound planning decisions (planning mobility in cities, real-time information to prevent accidents, etc). The focus of the data strategy should be on strengthening the framework conditions for data collaboration and data partnerships.

While standardisation may indeed be beneficial in many cases, there is also the potential for it to hamper innovation in certain cases, such as where it becomes mandatory at a very early stage of development and thereby prevents alternative avenues of innovation from being explored.

The European Commission could also help European companies by negotiating favourable (in terms of privacy/information security) terms with existing cloud service providers, in addition to efforts to help build European cloud infrastructure.

- ■ **"More data should be available for the common good, for example for improving mobility, delivering personalised medicine, reducing energy consumption and making our society greener." To what extent do you agree with this statement?**

Strongly agree.

Additional supporting text

Insurance Europe believes that the more data that is available for the common good, the better the digital solutions and analytical models will be. For the insurance industry, greater availability of data can lead to better risk monitoring and assessment, improved customer experience and better fraud detection.

At the same time, it is important that citizens' fundamental personal rights should be guaranteed at all times. For this reason, data should be anonymised and segmented according to the information that is to be processed (eg public health vs. mobility data).

It could also, for example, be useful to delimit which data has to be shared on a mandatory basis (eg in order to avail of the service) and which data has to be shared with the user's prior consent (based on a possible benefit or improvement).

- ■ **Do you think that it should be made easier for individuals to give access to existing data held about them, e.g. by online platform providers, car manufacturers, producers of wearables, voice assistants or smart home appliances, to new services providers of their choosing, in line with the GDPR?**

Yes.

- ■ **Which mechanism(s) do you think would help achieve this?**

    - **A compelling offer to use the data that brings benefits to the individuals**

    - **Practical solutions that allow individuals to exercise control, such as mobile and online dashboards or apps**

    - ~~Additional rights in law~~

    - ~~Other~~

    - ~~I don't know / no opinion~~

Additional supporting text

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 him or her, eg if a customer decides that an insurance undertaking may access his/her driving data, the vehicle manufacturer should grant access on reasonable terms.

From the perspective of the insurance industry, it is also necessary to clearly set out which data must be transferred between an OEM (original equipment manufacturer) or any platform and insurers, distinguishing between different actors: data subject, data controller, data processor and recipient.

■ **Have you faced difficulties in recruiting data professionals (workers who collect, store, manage, analyse, interpret and visualise data as their primary or as a relevant part of their activity) during the last 2 years?**

Yes.

Additional supporting text

Experience from within the insurance industry suggests that companies do indeed face recruitment difficulties, especially for data engineer and business analyst profiles. Data professionals are highly valued and in demand in the market, often with high levels of turnover. However, difficulties have been encountered fitting certain profiles into more traditional and/or more complex organisational models, making it difficult to recruit and retain talent.

■ **'General data literacy across the EU population is currently insufficient for everyone to benefit from data-driven innovation and to become more active agents in the data economy.' To what extent do you agree with this statement?**

Somewhat agree.

Additional supporting text

This is an area in which there may be enormous differences among member states and where there is a clear need for improvement. Capabilities, knowledge and access to technology is determined by the age of the users and by the technological gap between different population areas. Even within member states, access to technology in large cities may not be the same as in rural areas. Investment in both infrastructure and appropriate education and training would help to ensure that the wider population across Europe can become more active agents in the data economy.

■ **Have you had difficulties in using data from other companies?**

Yes.

■ **What was the nature of such difficulties?**

- **Impossibility to find companies to supply data of relevant quality**
- **Denied data access**
- **Prohibitive prices or other conditions considered unfair or prohibitive**
- **Technical aspects relating to both data interoperability and transfer mechanisms**
- **Other**

In addition to the issues identified above, there are markets where data providers have substantial market power (eg tight oligopolies like credit rating agencies), which can substantially impact market conditions and prices.

There is also a clear lack of data standardisation that prevents other industries from benefiting from transversal information, such as data sharing related to the Internet of Things (IoT) (eg smart machines in the agricultural or industrial sectors) where data is typically co-generated by several parties.

In the case of mobility, it would be necessary to have vehicle information in order to offer a better service to the final user, such as in the case of eCall. In addition, relevant information is needed in order to offer use-based insurance value propositions (such as PAYD or PHYD) or loss information when vehicles have advanced driving assistance systems level 4 or 5 (to determine what has happened).

There are some sectoral initiatives in this regard however, such as B2B data sharing in the financial sector in Denmark, where data sharing has taken place through voluntary data partnerships allowing consumers to easily access their own data across the financial sector.

- **'It is currently challenging to define solutions on the allocation of the rights to use data coming from smart machines or devices that are fair for all parties concerned'. To what extent do you agree with this statement?**

Somewhat agree.

Additional supporting text

Insurance Europe would highlight the importance for consumers to be able to access data from their cars. Today car manufacturers consider the data that is generated by the car as theirs, despite the fact that it is generated by the consumer.

Due to the Type Approval Regulation (EU) 2019/2144 (Art 6), all new vehicle models in the EU from May 2022, and as from May 2024 all existing vehicle models, will have to be equipped with an event data recorder ("black box"). In the interest of claimants, insurers should be granted access to standardised, interoperable accident data in order to allow for a fast and accurate claims settlement. At this stage, data is anonymised and access is limited to national authorities only for the purpose of accident research and analysis (Art 6 para 4(d)).

- **'The EU should make major investments in technologies and infrastructures that enhance data access and use, while giving individuals as well as public and private organisations full control over the data they generate.' To what extent do you agree with this statement?**

Somewhat agree.

Additional supporting text

Insurance Europe believes it would be important to establish a framework on how to exchange data between companies, and how to give customers the possibility to export their data, ensuring appropriate anonymisation of data to protect privacy. This would help to encourage research and development, as well as the creation of

anonymised data sources. The creation of anonymised datasets, such as a standard auto manufacturers' data repository, would offer the potential for further useful innovations and services to be developed.

The EU should make these technologies and infrastructures available to all, allowing the possibility of adapting them to local regulations and ensuring that individuals, public and private organisations are aware and have full control over the data they generate. In this context, the Commission could also help facilitate the development of European cloud service providers to enhance Europe's digital sovereignty.

Cooperation between the public and private sector is vital in this field.

However, investment alone will not be sufficient. The fragmentation between supervisory authorities (eg data protection and financial supervision) and their laws also poses a challenge.

■ **'The development of common European data spaces should be supported by the EU in strategic industry sectors and domains of public interest (industry/manufacturing, Green Deal, mobility, health, finance, energy, agriculture, public administration, skills).' To what extent do you agree with this statement?**

Somewhat agree.

<u>Additional supporting text</u>

Insurance Europe believes that the general idea behind common European data spaces is to be welcomed. However, much depends on the specific operating model and implementation chosen for the data space. As an initial step, the data shared through such data spaces should be data that is already publicly available. Additionally, where possible and feasible, the data should be presented in anonymised form. It is important that trade secret rights and personal data rights are not violated by such a data space.

Data sharing should also be based on voluntary partnerships and not be mandatory.

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.

■ **Are there general comments you would like to make about the data strategy?**

Insurance Europe finds the significant focus on better framework conditions for data sharing B2B, G2B and B2G to be positive. In this context, it will be important to adhere to the strategy's vision of strengthening the framework conditions for data collaboration and data partnerships. It is particularly important to emphasise that the strategy's aim is that sector-specific legislation on data-sharing should only be introduced when there are identified market failures.

It is crucial to have a data strategy at the European level that allows the benefits of data usage to be maximised, while at the same time protecting and respecting users' rights.

The development of common datasets across Europe raises some questions about the nature and the use of the data, as well as its accessibility especially outside the EU (level of protection, access for competitors outside EU, etc).

Fundamental aspects that should form part of this strategy are proper investment, relevant methodologies and rules, and a reasonable time period for implementing them.

Section 2.1 - Specific questions on future actions: Data governance

- **'Data governance mechanisms are needed to capture the enormous potential of data in particular for cross-sector data use.' To what extent do you agree with this statement?**

Somewhat agree.

Additional supporting text

Insurance Europe believes that an appropriate data governance framework could help to support data-driven innovation, making it easier to process and use data. This could also help citizens to further benefit from the sharing of information, secure in the knowledge of how their personal data will be handled and that their fundamental rights will be respected.

However, the nature of such a mechanism should be made clear, to avoid the introduction of new data requirements that could have a more restrictive impact on innovation.

Special attention should also be paid regarding data governance of new types of data, creating control mechanisms and usage rules in order to anticipate potential risk and/or misuses.

Standardisation

- **'The re-use of data in the economy and society would benefit greatly from standardisation to improve interoperability.' To what extent do you agree with this statement?**

Somewhat agree.

Additional supporting text

The use of data across a wide variety of systems, models and technological solutions makes it extremely challenging to ensure that the data is up to date in all places at all times. Ensuring standardisation of processes and data becomes vital for the common good and will ultimately cause less need for further data processing if there is increased interoperability.

The adoption of common standards based on stakeholders' experience and the sharing of benchmarks could help to reduce barriers to the use or exchange of data between stakeholders. The challenge will then be to consolidate these standards and benchmarks at the European level.

Cooperation and interaction between Members States through cross-border digital public services is also a priority.

■ **'Future standardisation activities need to better address the use of data across sectors of the economy or domains of society.' To what extent do you agree with this statement?**

Strongly agree.

Additional supporting text

Standardisation is an important element to facilitate and exploit the potential of data in the economy and in society. To be efficient, standardisation must therefore serve both the interests of the common good and of business. Allowing a wide diversity of standards will only serve to slow down development and innovation.

■ **Which of the following elements do you consider to be the most useful in terms of standardisation?**

- ~~Metadata schema~~
- **Metadata variables (semantic interoperability at the metadata level), including ontologies, controlled vocabularies and agreed thesauri**
- **Data formats**
- ~~Common data models~~
- **Data exchange protocols**
- **Application Programming Interfaces (APIs)**
- **Licences or licence terms**
- ~~Other~~

■ **What role should EU or national government bodies take in standardisation?**

- **Provide necessary funding in order to ensure open standards**
- **Take an active role in the prioritisation and coordination of standardisation needs, creation and updates**
- ~~Be directly involved in defining standards~~
- **Provide funding to test draft standards in practice and develop tools to implement them early-on**
- ~~Other~~
- ~~Governments should not have a role in standardisation~~

Secondary use of data

■ **'Public authorities should do more to make available a broader range of sensitive data for R&I purposes for the public interest, in full respect of data protection rights.' To what extent do you agree with this statement?**

Strongly agree.

Additional supporting text

Insurance Europe is of the view that there would be public interest benefits in the re-use of such data for R&I purposes. For example, in light of a pandemic, the exploitation of data could facilitate research and provide key information for the containment of the disease. In this sense, it could be done with great transparency, in an aggregate way and fully explaining to citizens the advantages that this disclosure of information has for society at large.

However, it is important to stress that there is a need to ensure respect for the protection of personal data and to apply appropriate anonymisation techniques.

■ **Which of the following should public authorities do to facilitate data re-use:**

‒ **Help the re-user to identify the exact authority that is holder of a specific set of data (one-stop-shop)**
‒ **Ensure that the request for data access is processed faster, within agreed deadlines**
‒ ~~Assess whether the re-use of the data could potentially harm the interests of others (of the persons/companies whose data is being used) for concrete use-cases~~
‒ **Be able to provide anonymisation of specific data for concrete use-cases**
‒ **Offer the possibility to process data within a secure environment it makes available, so that the user does not need to obtain a copy of the data**
‒ **Clarify from the outset the legal rules on the purposes for which the data can be used**
‒ ~~Provide for recourse mechanisms to challenge decisions on one or several of the above.~~
‒ ~~Other~~

Data altruism

■ **Do you think that law and technology should enable citizens to make available their data for the public interest, without any direct reward?**

Yes.

■ **For which of the following purposes would you be willing to make data available:**

‒ **For health-related research**
‒ **For aspects relating to the city/municipality/region I live in, including for example improving mobility, to improve environmental challenges that can be addressed through action at local or regional level**
‒ **For other public interest purposes**
‒ ~~None of the above~~
‒ ~~I don't know / no opinion~~

■ **Do you think there are sufficient tools and mechanisms to "donate" your data?**

I don't know / no opinion.

- **In which of the following domains do you see potential for the use of 'contributed' data:**

  - **For health-related research**
  - **For aspects relating to the city/municipality/region I live in, including for example improving mobility, to improve environmental challenges that can be addressed through action at local or regional level**
  - **For other public interest purposes**
  - ~~**None of the above**~~

Data intermediaries

- **'Such intermediaries are useful enablers of the data economy.' To what extent do you agree with this statement?**

Neutral.

Additional supporting text

Insurance Europe wishes to highlight the risk that such intermediaries may themselves create new data monopolies / oligopolies, thus potentially hindering the market in its development. Appropriate steps should therefore be taken to ensure effective competition and avoid the creation of dominant, monopolistic positions.

Section 2.2 - Specific questions on future actions: identification of high-value datasets

- **'The establishment of a list of high-value datasets, to be made available free of charge, without restrictions and via APIs, is a good way to ensure that public sector data has a positive impact on the EU's economy and society.' To what extent do you agree with this statement?**

Strongly agree.

- **Apart from the potential to generate socio-economic benefits, please indicate the relevance of the following additional factors to be taken into account when selecting datasets for the future list of high value datasets:**

  - **The re-use of the dataset would increase if it was provided free of charge.**
  - ~~**The dataset belongs to a thematic area in which there are few EU-level requirements for opening up data.**~~
  - **The re-use of the dataset would increase if its availability under uniform conditions was ensured across the entire EU.**
  - **The re-use of the dataset would increase if it was available via an application programming interface (API).**

■ **If other factors, please specify.**

- Data refresh frequency (monitoring of meteorological data, epidemiological data, etc)
- Data retention
- Documentation (metadata)
- Ensuring quality, integrity and timeliness of data
- Use of bulk download facilities to allow download of full datasets in a format that can be easily imported

■ **Under the Open Data Directive, specific high-value datasets will have to be available free of charge, in a machine-readable format, provided via APIs and, where relevant, provided as a bulk download. Please indicate the relevance of each of the other arrangements indicated below to improve the re-usability of specific high-value datasets.**

  – **Licensing and other terms applicable to re-use**
  – **Standardised formats of data and metadata**
  – **Possibility of user feedback**
  – ~~**Specific technical arrangements for dissemination censing and other terms applicable to re-use**~~

■ **EU programmes may provide funding to enhance the availability and re-use of high-value datasets across Europe. For each of the following activities, please indicate how relevant it is to support them.**

  – **Improving the quality (e.g. machine-readability) and interoperability of the data/metadata**
  – **Ensuring sustainable data provision via application programming interfaces (APIs)**
  – **Engaging with re-users (promoting the data, co-defining use-cases)**

■ **If other activities, please specify.**

Insurance Europe would highlight the importance of fostering cooperation among users and providers in order to ensure availability and demand are aligned.

■ **According to your experience and the expected potential of concrete datasets, indicate up to three specific datasets that should be listed in each of the thematic categories of high-value datasets, as referred to in Article 13(1) of the Open Data Directive:**

Geospatial: high quality and timely Geo basis data (addresses, building information), maps for high water and areas at risk of heavy rain, municipal supply networks; OpenStreetMap, National address databases (BAN/BANO)

Earth observation and environment: soil topography (drought, water, pollution), cadastral information and factors that can identify the characteristics of constructions (size, date of construction/renovation, materials, etc.); information derived from satellite imagery (eg roof shapes), analysis of current events (high water, heavy rain)

Meteorological: high quality and timely provision of data on extreme events

Statistics: Socio-demographic data; Access to data sets currently only available for scientific use (in Germany eg household survey data, enterprise panel data)

Companies and company ownership: Non-financial information which is essential for strengthening the database of sustainable finance (published non-financial information should be consistent with the requirements of the renewed non-financial reporting directive (NFRD), the disclosure regulation (SFDR), and the taxonomy regulation to help companies and their investors comply with their data requirements)

Mobility: tracking of travel through geolocation (Waze, Google and telephone operators), road traffic analysis, modes of travel used, intermodality; Access to data sets of public sector bodies of the member states concerning the safety and security situation of ongoing road traffic, access to data sets of public sector bodies of the member states concerning the historic development of safety and security on public roads; Access to car manufacturers' data.

Section 2.3 - Specific questions on future actions: the (self-/co-)regulatory context of cloud computing

- **Does your organisation use and/or provide cloud or edge services?**

Yes, my organisation *uses* cloud or edge services.

- **Does your organisation use:**
  Cloud
  ~~Edge~~
  ~~Both cloud and edge~~

- **Do you believe the cloud market currently offers the technological solutions that you need to grow and innovate your business?**

Yes.

- **Do you feel that your organisation's sensitive data is adequately protected and secured by the cloud services you use?**

Yes.

Additional supporting text

One of the top priorities of the insurance industry is to ensure that sensitive data is protected, and there are multiple control mechanisms and protocols in place to do so. Insurance Europe would highlight in this regard

the requirements in place at EU level for the insurance sector in the context of outsourcing to third party providers, such as the Solvency II framework and EIOPA's Guidelines on outsourcing to cloud service providers (see   https://www.eiopa.europa.eu/content/guidelines-outsourcing-cloud-service-providers_en).   In addition, the Commission is currently working on the development of standard contractual clauses for outsourcing to cloud service providers by financial institutions. This should help to further strengthen and solidify the obligations on cloud providers to protect and secure data, as well as help to address potential imbalances in terms of negotiating power between insurers and dominant cloud providers that insist on their own standard terms and conditions.

◼ **Have you experienced problems in the context of the current functioning and constitution of the market for cloud services in Europe?**

Yes.

◼ **Do these problems relate to:**

- ~~Cost of cloud services~~
- **A limited possibility to switch providers, please specify**
- **Asymmetry of power of negotiation between customer and provide, please specify**
- **Contractual practice on the market, including unilateral change of terms and conditions, please specify**
- ~~Security risks, including leakage of data or intellectual property~~
- ~~Other~~

Additional supporting text

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.

In this regard, Insurance Europe welcomes the planned approach of the Commission to encourage and facilitate the development of standard contractual clauses (SCCs) for cloud outsourcing by financial institutions. The development of SCCs is particularly important to avoid any potential imbalance of the negotiating power between financial institutions and cloud service providers. Areas where this could be particularly useful include sub-outsourcing, access and audit rights, security of data and termination rights / continuity arrangements.

An additional challenge that is regularly encountered by the insurance industry relates to the fact that the cloud service provider will generally refer to its own standard terms and conditions regarding the right to unilaterally change the terms of service. This is often with very little or insufficient notice period for the insurer to assess the changes. While not an issue that is directly covered by the existing regulatory framework on outsourcing, Insurance Europe would welcome consideration of this problem in the SCCs, at the very least to ensure that financial institutions are provided with sufficient time to assess any proposed changes to the terms and conditions of service and, where deemed necessary, to allow for an orderly withdrawal from the outsourcing arrangement.

In this context, the Commission could consider how to help facilitate the development of European cloud service providers to enhance Europe's digital sovereignty and help contribute to improving the functioning and constitution of the market for cloud services.

■ **Do you perceive risks emerging from the current functioning and constitution of the market for cloud services in Europe?**

Yes. Current sector-specific outsourcing regulation and supervision of the outsourcing party does not reach the **source of risk**, which typically concentrates at **provider level** and not at the level of insurers.

■ **Does your organisation have flexibility to procure/adopt new and innovative cloud solutions if they emerge on the market?**

No.

Additional supporting text

Insurance Europe would highlight the fact that cloud outsourcing agreements need to be negotiated at length with service providers before being concluded. This, along with relevant legal and supervisory requirements, creates difficulties for insurers to be sufficiently flexible to procure or adopt new cloud solutions.

The possibility to allow greater reliance on independent assurance by third-party certification bodies, for example, would help facilitate the use of innovative cloud solutions. EIOPA's guidelines on cloud outsourcing provide for the possibility for insurers to use third-party certifications and third-party or internal audit reports made available by the cloud service provider. However, the insurance sector would welcome the development of standard contractual clauses by the Commission that address this possibility to rely on the use of third-party certification in order to facilitate more efficient use of resources and make it easier to adopt new cloud solutions.

■ **Is your organisation aware of self-regulatory schemes for cloud/edge services (for example, codes of conduct or certification schemes)?**

Yes.

■ **Please indicate in which of the following areas you are aware of self-regulatory approaches:**
  − **Data protection**
  − **Data portability**
  − **Security**
  − ~~Energy efficiency~~
  − ~~Other~~

■ **Can you please name the specific schemes that you are familiar with?**

- DE: BSI C5 ISO 27001/27002, PCI DSS, HIPAA, COBIT
- ES: UNESPA together with TIREA (IT Company for undertakings) have worked on the creation of Self-Regulation Standards with the AEPD (Spanish Data Protection Independent Authority).
- FR: CIGREF code of conduct, new certifications HDS (Health Data Hosting)

■ **How do you believe market awareness of these schemes could be raised?**

Market awareness of these schemes could be raised through greater government involvement, clearer rules and practices, unambiguous guidelines, and greater transparency in communication, simplifying the way in which these schemes are promoted not only to technical specialists but also to the general population.

■ **Do you believe a self-regulatory approach is appropriate to identify best practices to apply EU legislation or self-regulation?**

Yes.

■ **If yes, do you believe a self-regulatory approach is appropriate to identify best practices to apply EU legislation or self-regulation relating to:**
  - ~~Data protection~~
  - **Data portability**
  - **Security**
  - **Energy-efficiency**
  - ~~Other~~

■ **Would it be beneficial for your organisation if applicable rules for cloud and edge would be bundled and corresponding information made available by the European Commission?**

Yes.

Additional supporting text

Insurance Europe believes that it would be helpful if the Commission conducted a review of applicable rules in this area and make the relevant information available. This would help to improve transparency, which may in turn speed up the contracting and use of such services by industry. It may also help to facilitate the emergence of EU providers that are compliant with all the applicable rules.