The EU Data Act
Connected Products & Related Services

Action Items and
Implementation Requirements

By codifying the EU Data Act, the EU legislator introduced numerous requirements for data holders, manufacturers and sellers of connected products and providers of related digital services.

Safeguard Your
Data Use Interests

Under the EU Data Act, the user, not the dataholder, will have usage rights for product and service data. You must ensure your company secures the right to use this data in the future.

1. Draft the new mandatory **data license.**

2. Review existing **terms and conditions.**

Transparency
Requirements

You must provide clear information on the product's capabilities, data, and user rights. Collecting this information and setting up the associated workflows requires preparation.

1. Determine legal requirements.

2. Establish workflows and roles.

3. Decide what information will be provided and how.

3. Draft the new mandatory notices.

User Access &
Transfer Requests

Users can request their generated data be disclosed or transferred to a designated third party. These requests will create operational challenges.

1. Determine legal requirements.

2. Establish roles and workflows.

3. Decide what data will be released and by what (technical) means.

4. Conduct a **data inventory.**

5. Prepare a **playbook** and response language to manage and process

Access by Design

Data must be accessible to users by design. Preparing for this requires close cooperation between legal departments, developers, and product and service specialists.

1. Determine legal requirements.

2. Identify relevant stakeholders in the design process. Establish roles and workflows.

3. Integrate requirements into the design process and manufacturing, and update established workflows, roles and playbooks.

We work with our clients on Data Act projects, offering legal analysis, templates, best practices, and guidance for implementation and data inventory efforts.