DATA TRANSFER INITIATIVE

2025 ANNUAL REPORT

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From the Executive Director

This year was our third year of operation, and it is remarkable to me – though not surprising, in the context of a growing organization and a rapidly evolving ecosystem – just how different each of the years have been from each other. At first, we built the foundation for our work, recruiting our initial core team and establishing workflows and initial outputs. Last year in 2024, the DTI story took a theme of "journey", highlighting both the impacts we delivered as milestones on the road that leads forward. This year, the world seems to be moving faster, and we are marching right along with it.

In the fall of 2024, I looked at 2025 as a "make or break" year for this organization, in many ways. We're established enough now that our identity in the sectors we occupy is clear; we no longer get excuses for being a new organization, and we should expect ourselves to deliver on all fronts. That doesn't mean anything would come easily, especially not this year, when the world seems determined to throw wrenches into everyone's most well-made plans. Despite that, I'm incredibly proud of what we have accomplished.

We leaned in this year, hiring two new staff members, a Head of Europe and a lead for a new workstream on public engagement and research, growing our team to five full-time employees complemented as always by our outstanding engineering contractors. I can't tell you how often I hear disbelief from my peers that we produce as much output as we do with such a small team. We increased our investment, but did not decrease the proportional returns on our investments at all. In fact, I believe our ROI improved with the efficiencies that come from established operations and processes.

Here are the highlights of our impact this year:

- **Launched trust registry**: We are conducting a pilot with one platform partner and several smaller organizations, successfully issuing level 1 and level 2 credentials.
- **Maintained and grew DTP**: Our core support for the Data Transfer Project continued through weekly meetings, to which we added several new maintainers from current and new organizations. We made progress on generic adapter tooling, and began work with Synology and Amazon on new DTP extensions for photos and videos.

- **Put portability on the AI map**: We articulated original principles for the portability of personal data in AI, receiving significant positive exposure; and we began convening organizations to collaborate on implementation of the principles in practice.
- **Submitted comments**: Where data portability was on the table, DTI was present, filing multiple regulatory comments in the United Kingdom, European Union, Australia, and the United States, and comments with the Council of Europe.
- **Developed thought leadership**: Every two weeks we published a new blog post and email newsletter, covering new thinking on reciprocity, realtime access, and other topics.
- **Supported researcher access**: Building on extensive collaborations with medical and sociotechnical researchers in the US, UK, and Europe, we developed and shared a prototype toolkit to facilitate user data donations.
- **Hosted key events and discussions**: We have played a prominent role in several set-piece events, including our portability workshop in Brussels, and others that we sponsored including the MyData Global conference in Finland, and the UK Smart Data Forum. We have led discussions in these and other contexts to raise DTI's profile, to communicate our mission, and to highlight our work on portability.
- **Recruited new organizations**: To expand and diversify DTI, we initiated an affiliates program as both a top of funnel for future partners and a light-touch avenue to join and support our work, and we added 3 affiliates, with more prospects under development.
- **Took on new ideas**: We took on new growth projects related to consent portability, through a collaboration with the Future of Privacy Forum, and building a prototype schema library.
- **Continued standards engagement**: We moved the ball forwards with three standards processes highly relevant to data portability: LOLA (ActivityPub account portability), PDPArchive (email and other personal data portability), and contributions to OAuth.

We didn't achieve everything in our 2025 strategic plan. For example, although we had originally proposed to grow our Portability Map, we instead decided to pause that, and take a step back to think more strategically about how best to invest in public engagement. Separately, I had set out a goal of recruiting 5 affiliates; we added 3, with a 4th on the horizon.

Our biggest challenge this year was with fundraising – a circumstance shared, I expect, by almost every nonprofit without "AI" in the name. Despite consistent and diversified efforts,

we did not secure significant philanthropic support for any of our projects. I was told by multiple contexts that in any normal year, we would have had success; but 2025 was not a normal year by any measures, for us or any organization. We haven't given up on this goal by any means, but it will take a little more time and a little more luck before we find success.

Counterbalancing our misses were surprise hits, opportunities for impact we hadn't necessarily anticipated, yet didn't hesitate to seize when spotted. We're building a schema repository now for data models, and have identified significant potential collaborators and contributors to that work. When the Australian Productivity Commission started to look at data portability, we were able to step up and contribute to their efforts. And our vision and leadership on the importance of portability of personal data in AI simply exploded; we shipped principles and began bringing stakeholders together to build real and impactful solutions.

I wrote in last year's report that 2024 was full of surprises. Little did I know how the year 2025 was laughing in anticipation. But I continue to believe, as I did last year, that at DTI we are taking on the right challenges and delivering timely, critical impact to fulfill our mission: to empower people by building a vibrant ecosystem for simple and secure data transfers.

Cheers,

Chris Riley Executive Director
Data Transfer Initiative

1. The data portability march

We are three years in at DTI. By now, we have a well-established voice and presence in the digital ecosystem, far beyond our small size as an organization. We have outputs that we're widely known for, including policy expertise and innovative, impactful technology products. Our input is sought by businesses and regulators around the world. We're proud of what we've done, and at the same time, the road ahead remains long, and we shall continue the march.

As with prior reports, we will first identify our core initiatives and summarize where we began and ended the year. Next, we will look at how our work has helped build the core capacities of the organization, which help translate our work into the overall impact we seek to have. Finally, we will look briefly at what the future holds.

2. Progress on core initiatives

To our prior "core initiatives" of technology, policy, and organization, this year we added a fourth, with its own goals: research and engagement. Let's dig in.

Technology

This year, recognizing that there were going to be many shifting winds, we upleveled our strategic planning and identified three goals per substantive workstream. For technology, that meant three areas of investment: DTP tools, our trust work and particularly the registry, and building for emerging contexts, specifically fediverse and AI.

Goal	Impact
1. DTP growth and extensions: verticals, generic adapter → new organizations	**Ongoing –** We began using the generic adapter within DTP, alongside specific party adapters. Two additional organizations began serious work with DTP, one of which is in active testing and near deployment.
2. Trust registry: prove concept with pilot, plan for the future	**Success –** We launched our pilot, onboarded multiple organizations and one platform partner, and publicly shared our work; and we are positioning the registry for more in 2026.
3. Build for emerging contexts: fediverse, AI	**Success –** ActivityPub account portability is moving forward within the relevant standards organization. We launched AI portability principles and hosted calls among AI services to build collaboration.

We are excited for the future of Data Transfer Project powered end-to-end tools. We continue to believe they reflect the best-in-class portability solutions aligned with DTI's values. As the portability ecosystem grows, many other options are being invested in as well, particularly specific portability APIs; and our work, including with trust, is meant to support portability and user-centric data transfers in all their forms.

Our work on trust has become a key piece of our organization's brand and lever for growth and impact. The trust registry remains in pilot stage, but is poised to emerge next year, and remains open to new applications, even as we continue to improve some of the applicable policies and other elements.

We are seeing AI portability tools take on three distinct paths. The first, pioneered by DTI and Inflection last year, is the use of traditional data portability procedures and pathways to let users transfer their conversation histories; while explicitly offered by Inflection for their Pi service, users can currently download their two-way conversation histories from other mainstream generative AI tools as well. Second, Anthropic has announced support for user import and export of synthesized “memories”, which the company believes offers an effective means of transferring understanding and personalization capabilities without the need to transfer as high a volume of potentially sensitive data. Third, new DTI affiliates Koodos and Fabric are each building tools to empower users with respect to their “context”, personalization landscapes based on data and activity submitted by the user. We see all of these as promising opportunities to empower people in the context of AI services.

Paired with tools and trust, we are also exploring new technology projects, notably a repository for schemas that will facilitate discovery and mutual understanding of data portability options. Expect much more on that next year!

Policy

As before, this year we engaged extensively with the policy communities in the United States, United Kingdom, and European Union. We met with stakeholders from civil society, industry, and government; we prepared and submitted comments as appropriate for regulatory proceedings; we participated in and led policy discussions with global thought leaders; and we wrote articles on a broad range of topics. For this year, we set out a specific intention of hosting a policy event in Brussels; and a goal of building new substantive analysis on reciprocity, consent, and continuous and realtime policy. We delivered on these goals, and more.

Goal	Impact
1. Be present wherever, whenever portability is on the table. Host events in Brussels+	**Success –** We showed up significantly, particularly in Europe where we hosted a half-day data portability event in Brussels and contributed substantially to MyData in Finland. Through our new Head of Europe, our frequency of face-to-face contact in the UK and EU increased substantially.
2. New/more emphasis: reciprocity, consent, continuous+realtime	**Success –** We published multiple newsletters and short articles on policy topics across the portability spectrum, including reciprocity. We kickstarted conversations around consent portability, and have works in progress on the topic. And we funded and supported an original research report on realtime portability by Thomas Carey-Wilson of ODI.
3. Drive positive shifts in evolving tech policy in EU, UK, US	**Ongoing –** In a year of substantial change, we can tell our efforts are influential by how other stakeholders respond, validate, and amplify our work. However, major policy dockets are in transit, and the full effects will not be visible for some time to come..

The global data portability ecosystem is fragmented by a lack of effective coordination, both at the micro level between companies, and at the macro level across jurisdictions. DTI has been addressing these challenges head on by occupying and ambitiously expanding the center ground of data portability policy. While our goals are relentlessly ambitious, our policy solutions are always pragmatic, practical, and grounded in real-world evidence and application.

Our policy team is working hard to unify the data portability ecosystem and improve coordination between participants by serving as a bridge – a "portability policy API," if you will – that brings stakeholders together to find common ground and practical solutions. We are approaching this challenge carefully through articles, blogs, regulatory submissions in the U.S., Europe, and beyond, research reports, panel discussions, and consistently championing policy approaches that can unify the sector and maintain momentum. While our progress in expanding and diversifying DTI's membership does of course help with these coordination efforts, it is also evidence that we are successfully creating a safe middle ground in which companies can collaborate constructively.

In pursuit of a globally interoperable ecosystem for portability, we are also helping to improve coordination and alignment between policy makers and regulators worldwide. We are boldly plugging in our Data Trust Registry as the "regulatory universal adaptor" between parallel policy initiatives in different legal jurisdictions that might otherwise be incompatible. In this initiative, our technology and policy efforts are interdependent and working as one. Our technical team is building the global solution for managing trust between transfer parties, while our policy team prepares the ground for it by engaging with key regulators such as the European Commission and the UK Government to ensure our solution is compatible with their differing objectives and legal frameworks. These interactions create a positive feedback loop, helping us to tailor the implementation of our Trust Policy and procedures to meet all stakeholders' needs.

We expect 2026 to be a defining year for data portability policy, with major regulatory developments happening all over the world. Following the one-year review of the EU's Digital Markets Act (DMA), we may see a ramping up of expectations for implementation and a possible expansion of scope into AI services. In parallel, the UK government has shown clear intent to extend its Smart Data Policy from the banking sector to digital markets. Success for our policy work next year will see these two

differing regulatory initiatives (along with any others that emerge) converging to deliver a single, coherent and interoperable outcome, with our Data Trust Registry embedded and recognised as a core component. Our work in 2025 has put us on course to achieve this.

Research and Engagement

Our vision papers for data portability in 2024 revealed a hole in our strategy: we weren't doing much to raise broad public awareness of data portability. We weren't working to understand where people stand on the topic, what kinds of messages resonate, and how we can get people to expect more and better portability options from their service providers. So for 2025, we hired a Director of Research and Engagement, and we got to work.

Goal	Impact
1. Develop surveys, other instruments to learn more from people	**Ongoing –** We conducted small-scale informal surveys through our newsletter, but received few responses. Broader-scale efforts were initially sketched out, but remain on hold for funding considerations
2. Refine + grow newsletter, Portability Map as tools for engagemen	**Mixed –** We improved our newsletter and our backend management, including handling growing spam problems that began to arise. We published consistent and compelling content aimed at a broad range of audiences, including public audiences. We have put further development of Portability Map on hold at this point in time.
3. Achieve positive recognition for DTI in major media	**Success –** We published an article in Fast Company, authored by Jen, tying AI and privacy to data portability as a solution. In major policy media, we appeared on Techdirt's podcast and published many articles with Tech Policy Press.

Data portability remains a niche topic, even on the scale of tech policy work, itself a niche area. We see no signs of this landscape changing in the near term. However, awareness is growing within tech, and many other stakeholders in the digital ecosystem are increasing their investments in portability. Ultimately, public engagement is a lever for change, not a goal inherently in and of itself; and if people become excited by the innovations and benefits that portability provides to them, that is the more critical engagement goal.

Organization

This was a year of growth for DTI. We made a deliberate decision to dip into our financial reserves to expand our capacity in Europe, grow our technical and trust work, take on more public policy opportunities, and build a new function on research and public engagement. And we didn't miss a beat – we continued to ship newsletters and blog posts, to speak publicly on our work wherever we had the chance, to analyze issues in depth, to build compelling portability infrastructure, to lead at every turn rather than follow, and to network extensively.

We added two full-time headcount in 2025, and that is not a trend that will continue. Our goal for 2026 will be to ensure that we are focused, using our resources for the most strategic ends, and setting up DTI as an organization for years to come.

A key part of that will be adding new partners, something we did not do in 2025. Our new affiliates status gives us an entry point for organizations not at the scale or investment to consider partnership, and we added two this year. The trust registry also provides an even broader top-of-funnel for organizations to become familiar with our work, our integrity, and our value-add. The network surrounding our work remains large, diverse, and growing; and we now have more ways of showing that, and translating it into sustainable benefits for portability.

Focus on: Artificial Intelligence

Data portability tools, public policy engagement, and trust are the cornerstones of our work. But this year, a cross-cutting element was introduced that became its own workstream: artificial intelligence. AI took over the strategic plans and budgets of virtually every tech and tech-adjacent organization, in both the private and nonprofit stors. Fortunately, we entered the year with a plan, and a head start.

In August 2024, we partnered with Inflection – our first affiliate – to release a structured data model for exports of two-way conversation histories. Building on that, we set out at the beginning of this year with three goals: 1) raise awareness of the importance of personal data portability for the future of the AI ecosystem; 2) develop norms and principles for what that means in practice; and 3) bring companies together to collaborate on shared tools for AI portability.

We succeeded on all fronts, with multiple visible outputs, culminating in the publication of AI portability principles in August 2025, and two calls combining DTI partners and affiliates and other organizations in September and November. On tap for next year are a series of hackathons to encourage builders to use personal data, memories, and context to deliver innovation and growth in AI – all powered by data portability.

3. Measuring impact

We will continue this year with the four core capacities that we used last year as metrics for our work: 1) improved public knowledge of data portability; 2) active and engaged network; 3) positive DTI brand and reputation; and 4) robust data transfer products and infrastructure. This year, we will add a fifth, reflecting our work this year and I expect for years to come: 5) new frontiers for data portability, in collaboration with other stakeholders.

1. *Improved public knowledge of data portability* – For policy and technical audiences, our writings continued to provide expansive education on a wide range of data portability details. Also this year, we began to build a voice for a broad public audience, through some of our newsletters and one external article. This remains a work in progress.
2. *Active and engaged network* – Supporting and showing up as a leader at MyData in Finland established DTI with a new community of relevant organizations and individuals. We deepened our relationships with key stakeholders shaping the future of portability regulation, in London and Brussels in particular. And through our affiliates program and pilot trust registry, we added new ways for organizations to collaborate with us.
3. *Positive DTI brand and reputation* – As always, many dimensions of our work contribute to our brand and reputation, including our public speaking and written work, and the networking that all of our staff do on a regular basis. And it remains grounded by our substantive policy work and portability infrastructure investments, both in their quality and in our collaborations and communications around them.
4. *Robust data transfer products and infrastructure* – This year we made significant progress with DTP and our trust infrastructure; continued leading relevant standards processes and collaborations shaping the future of data transfer tools; and identified gaps, such as effective schema repositories, and began working to close them.
5. *New frontiers for data portability* – We kicked off new conversations around the critical nature of portability of personal data in artificial intelligence. And we tackled existing but under-studied issues, including the meaning of realtime portability and the possibility of shared metadata for consent.

These are our intermediate metrics, which are somewhat measurable and also highly correlated both down to our actions and up to our desired impact. They build on the highly measurable, granular and tactical work we do, such as submitting comments to regulators and shipping updates to our GitHub repositories. And they roll up to the strategic impact we deliver, such as better outcomes in policy and more tools in users' hands.

4. Looking ahead

Next year will bring new focus and likely iterations for our approach, and at the same time continued increases in strategic impact and in visibility for the data portability ecosystem, putting DTI on a path to stability in 2026, with the potential for growth next year and in years to come.

There is no end to our mission to build a vibrant ecosystem supporting safe and secure user-centric data transfers. But we will see some ends, as our registry emerges from the pilot stage and major policy processes in the EU and UK come to a head. With these ends will come new beginnings, but in an often topsy-turvy world, it's hard to say what those will be.

The road ahead is long, but the pace is quick. We hope you will join us on our journey. You can sign up for our emails here.