DATA TRANSFER INITIATIVE

Data Transfer Initiative:

VISION 2030

A roadmap for universal
data portability, by design.

DATA TRANSFER INITIATIVE

OCTOBER 2026 | DISCUSSION DRAFT

01 Our mission

The Data Transfer Initiative (DTI) is on a mission to empower people by building a vibrant ecosystem for simple and secure data transfers. Our mission is deliberately open ended, a moving target whose meaning will evolve and extend beyond that currently envisaged with the technology available to us today.

In the long term, we expect success to involve universal reciprocal support for users to transfer their personal data directly between all popular online services. The vast majority of digital products and services that collect users' data will have export tools such as APIs as well as import functionality. User journeys will be seamless and intuitive, followed by data transfers that complete in seconds, or even milliseconds, with success rates of 99.9% or higher. End-users (or third parties authorised to act on their behalf) will have full control over the categories of data that they wish to move around, and those they wish to keep private. And they will do so with confidence, knowing that the full menu of possible data destinations has been vetted and verified as trustworthy by DTI.

That vision is something that we keep in mind to steer our day-to-day work. But realistically it might be more than 10 or even 20 years until such a vision can realistically materialise. And perhaps as we approach these desired outcomes, they will be overtaken by new goals and new possibilities. Where technology and market dynamics evolve rapidly, focusing too far into the future will prove folly.

We therefore need an intermediate target to shoot for. A medium term vision that is realistic and achievable for us to strive for now, given what is currently possible and to some extent under our influence.

That is the purpose of this document. To set out DTI's medium term vision and our strategy for achieving it. It doesn't define the end goal, nor the entirety of our ambition. It is a realistic stepping stone to focus and anchor our work.

02



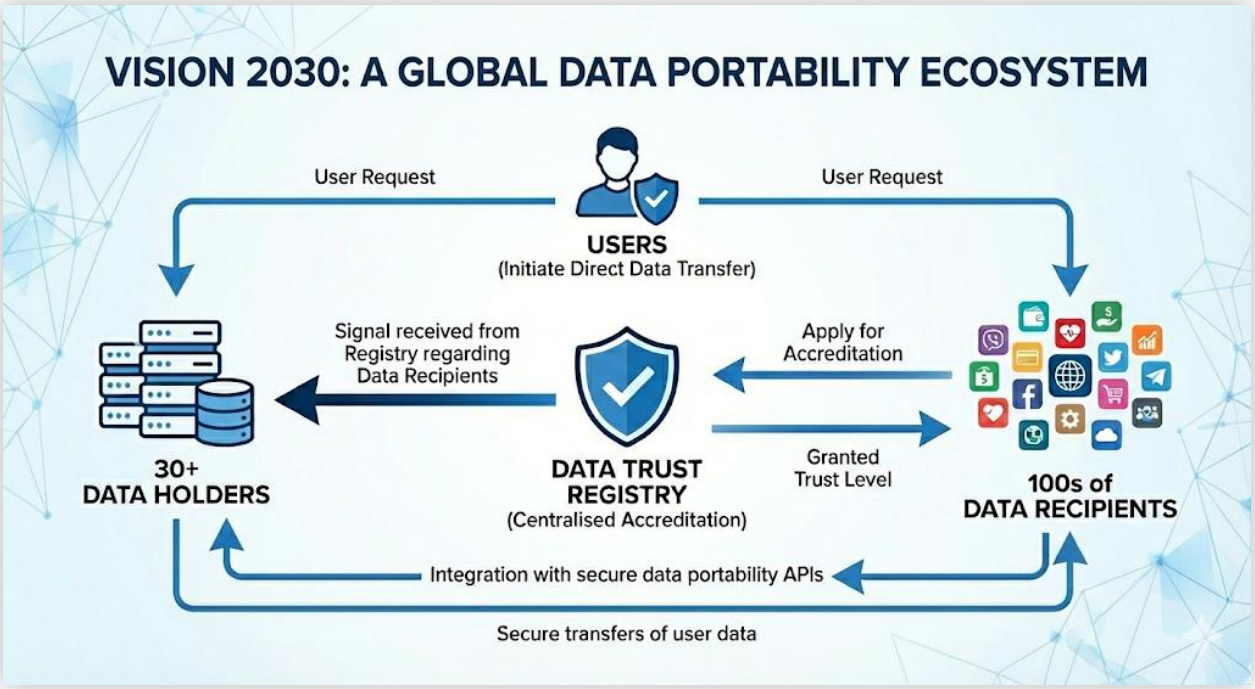
Vision 2030

By 2030, we expect to see a flourishing global data portability ecosystem, with at least 30 major technology companies shipping purpose-built data transfer tools that enable ongoing, low-friction, user-initiated sharing for end-users.

We will observe a wide array of downstream use cases, supporting hundreds of businesses, and many thousands of jobs. Some of these use cases will bring about improved consumer choice and freedom. Some will drive efficiencies or reimagine existing products and services through consented hyper-personalisation. And others will be brand new innovations, made possible by data and technology combinations not previously available. This includes the shift towards autonomous AI agents, which we anticipate being powered by rich portable user context, while simultaneously lowering the costs of making data available and experimenting with new ways to deliver user value through personal data. Thus, the upside for AI's impact on data portability is an increase across the board: production, value, and necessity.

This ecosystem will be underpinned by a single global governance framework, independently managed and coordinated by DTI. As we observe the placement of requirements on technology companies to support data portability in new jurisdictions, the expansion and maturing of DTI's Data Trust Registry will ensure the ecosystem can remain internationally interoperable.

We believe we are building towards the inflection point, the critical moment where incentives and market forces will be able to take data portability the rest of the way. We expect that our longer-term ambition for user-initiated data transfers that are universal, reciprocal, and real-time will largely be secured by market forces once this realistic medium term milestone is reached.



In the next five years, we want to see much more in the way of data portability in digital markets. This means we need:

1. **More tools:** more than 30 separate organisations with dedicated user-led portability tools enabling ongoing direct transfers. This would represent roughly a quadrupling of the current number.
2. **More value:** many millions of users requesting direct transfers to hundreds of services, supporting thousands of jobs.
3. **More trust:** with verification managed centrally on a global basis through the DTI's Data Trust Registry, with DTI Accreditation issued to hundreds of potential data destinations.

We describe below the progress we aim to make against each of these strategic objectives over the next four years. Under each, we indicate the individual workstreams that are active or planned to support this vision.

Strategic Objective 1: ***Delivering more data portability tools.***

First and foremost, if we are to make truly meaningful progress towards our mission, then we must have growth in the availability of high-quality data transfer tools. This will require a significant increase in the number of individual organisations with online services or digital devices that offer effective data export functionality that can be initiated by end users.

There are three broad approaches that organisations could take to implement data portability functionality:

- Further development of bespoke end-to-end transfer tools such as the Data Transfer Project, with additional participants exporting music playlists, photos, or possible new data types.
- Additional services roll out purpose-built data portability APIs, in addition to the current seven "gatekeeper" companies affected by the EU's Digital Markets Act.
- Services with existing data export capabilities such as a Web API open up the technology for user-initiated transfers with fewer restrictions on downstream use.

Without question, we must extend the availability of data portability tooling to reach the next tier of large online platforms and services. From AI assistants and streaming platforms, to travel and online retail, there are many technology companies with market values in the hundreds of billions of dollars that have the resources required to contribute to the Data Transfer Project or to build and operate a data portability API. And the increasing data needs of personalized AI systems will grow demand commensurately with this increased potential supply.

Progress towards this growth is likely to be achieved through a combination of market-led and regulatory initiatives. DTI will support both routes by:

- **Providing expert technical support:** we will continue to maintain the Data Transfer Project codebase, with the ambition of attracting further organisations to participate in the transfer of music playlists and photos, with the potential to expand into further data types. We will also continue to offer direct support and advice to other companies shipping data transfer functionality, including through our Personal Data Portability Playbook. The use of AI can reduce but not eliminate the inherent friction of deploying data portability; we're here to help with everything else.
- **Promoting voluntary development of tools and interfaces:** we will continue to encourage all organisations and service providers to implement data import and export functionality, such as data portability APIs, without any regulatory compliance burden. Growing DTI's membership and expanding participation in projects such as the Data Trust Registry and Schemas.Pub are all top funnel priorities for DTI to promote the implementation of data portability functionality. Where opportunities arise, we will also look to support coordination and collective action between participants in specific verticals, such as AI virtual assistants or web browsers.
- **Supporting effective regulation:** wherever regulatory authorities are taking forward initiatives to implement data portability in digital markets, we will proactively participate to support effective and well-designed regulation, as we have done for the Digital Markets Act (DMA) in the European Union. To this end, we are engaging with authorities in the United Kingdom, various US States, Canada, Australia and Japan, which could all plausibly introduce additional data portability requirements in the coming years.

Whether as a result of voluntary or regulatory action, we will consistently champion approaches that extend the number and diversity of digital services supporting effective data portability, in ways that maximise the alignment of outcomes towards a single cohesive global landscape, while respecting the uniqueness of each organisation, service, and user.

Strategic Objective 2: *Extracting more value from data portability tools*

The total value extracted from data portability tools and services around the world is a function of tool availability and demand for data portability use cases. We will not succeed in our longer term goals without growth in both areas.

Although the building of new tools, as discussed above, is a critical and central part of our vision, it is not sufficient in and of itself. For those tools to be fully effective in contributing to our long term goals, they must eventually be made available to as many people around the world as possible. At present, there is a concentration of data portability tooling availability in Europe, with some limited availability in other continents.[1]

Demand for data portability itself is not the end goal. Instead, our mission requires growth in consumer demand for the downstream products and services that data portability facilitates and serves as an input for. This kind of demand will support many profitable and sustainable businesses sharing tens or even hundreds of millions of users around the world. If we are successful in realising this vision, we will expect to see data portability use cases and infrastructure businesses emerging as tech unicorns by the start of the next decade.

We will seek to nurture this growth in the value extracted from data portability tooling through the following workstreams:

- **Creating the conditions for global coherence:** as regulation develops worldwide, we will push for regulatory certainty and consistency across legal jurisdictions (which should in turn reduce the perceived risk to platforms of making tools more widely available), and we will support international interoperability through our Data Trust Registry. Expanding DTI membership to additional companies with a large global user base will also naturally support this objective.
- **Encouraging more and better data portability use cases:** we will look for opportunities to widen developer awareness and capability with respect to data portability integrations, such as through Hackathons and capacity building workshops. We will endeavour to be a bridge that brings stakeholders together, unlocking new partnerships and collaborations in the process. This will involve structured events and gatherings of minds, including within our membership base, as well as more informal engagement with our wider

[1] For example, Meta's Export Your Information tool is available to its users globally, and Apple's Account Data Transfer API is also available in Japan.

network. Expanding and diversifying the members in our Affiliate membership tier will also contribute to this workstream. Through all of our efforts, we will build the perception of a more stable and predictable technology platform on which to invest and build a business. While DTI will remain use-case agnostic, connecting our efforts to the rapid developments and growing interest in agentic AI technology will be a core focus in this workstream. We also anticipate that with or without us, AI will increase the diversity and value of uses of personal data by lowering the costs of innovation and experimentation with new ideas.

- **Improving user experiences:** there are two strands to this workstream. First, we can focus on improving users' experience during the decision-making process, such as by reducing friction and clicks, while ensuring the processes, choice architecture and default settings are adequately informed by meaningful research. Second, we can aim to build more effective and reliable technology, for example that facilitates faster transfers with lower failure rates. DTI can support progress in these areas through expert advice, conducting targeted research, and ensuring there are adequate gateways for feedback to reach the relevant product and engineering teams.
- **Raising awareness:** our priority stakeholders for raising awareness of data portability and its potential benefits will be data holders, potential business users, researchers, and policy makers. If businesses come along with exciting new data portability use cases, we can rely on them to market themselves and their services effectively. Where success stories do emerge, a key part of our work will be celebrating them and distilling any lessons learned through communication of positive case studies. Should cost-effective opportunities to promote data transfers to a wider audience including consumers present themselves, for example through working in partnership with other organisations, we will take them.

To succeed in our mission, we must see data portability transition from being a niche privacy hack to powering widely adopted services that are ingrained into many millions of people's daily lives. The litmus test for this will not be public awareness of terms like "data portability" or "smart data", but whether companies utilising data portability can grow to become household names. We are convinced this can occur by 2030.

Strategic Objective 3: Improving trust between data transfer parties

Effective data portability takes at least two services to coordinate and interoperate with one another. This requires the establishment of trust between them.

Where service providers support exports of their users' data to third parties today, they generally undertake certain checks and procedures to verify that the destination for the data is legitimate and as presented to the user. This is to protect their users from bad actors, as well as to protect their own reputations.

While the purpose of such checks is justified, the current "many to many" arrangements make the data portability ecosystem inefficient and unscalable. As new data portability tools have come to market, and demand for them has started to grow, we have identified the friction and duplication in verification processes as one of the biggest barriers to achieving our mission.

While every data holder remains responsible for its own verification processes and criteria, each applicant data recipient must navigate each platform's process separately. This inefficiency and wasted resource has greatly decreased the practical opportunities for data transfer, and thus decreased user benefit as well as innovation in the field.

That's why we launched our Data Trust Registry in 2026, following an initial six-month pilot. By 2030, we expect our Registry to have successfully resolved the current governance challenges, while being welcomed by all participants as a critical component of the data portability ecosystem. By then, each data recipient service will be verified just once up front by DTI (followed by annual reviews), then efficiently gaining approval to access multiple data portability APIs, each with availability for hundreds of millions or even billions of users. We are building the Registry to accommodate listings for hundreds of organisations based all over the world.

For this success to be realised, our Registry will not only need to be accepted and relied on by data holders and data recipients. We will also require regulatory authorities to buy into our vision. In some cases – where interventions are relatively prescriptive – this could require the Registry to be built into the design and governance arrangements of a data sharing scheme. In others – where interventions are higher level and outcomes based – regulators might leave the door open for use of our Registry without necessarily mandating it. While we have no preference between these models, we will push back firmly against regulatory interventions that duplicate or cut across the Data Trust Registry in some manner, thereby adding to the problem that we are seeking to address.

The Data Trust Registry is essentially a three-sided platform, requiring participation from data holders, data recipients, and (to a lesser extent) regulators. As is common with platform services, we face strong indirect network effects that can be characterised as a chicken and egg problem. Data recipients will be discouraged from applying to the Registry if it does not provide direct access to data portability tools. Regulators will be reluctant to accept the validity of the Registry without sufficient scale of data recipients using it to prove its benefits. And data holders may not commit to relying on the Registry without some indication of endorsement from regulators, and without visible demand from data recipients.

Our priority workstreams for the Data Trust Registry will be to increase participation and support from all three stakeholder groups simultaneously:

- **Increasing data holder participation:** without participation from 2 or more major data holders, the Registry will serve a relatively narrow purpose. Convincing additional

platforms to rely on our Registry for verification of data recipients is therefore one of our highest priority workstreams in 2027. Gaining support from data recipients and regulators will contribute to this, but that will not be enough in isolation. We will also need to proactively communicate and evidence the benefits of participation with the Registry to data holders, while also demonstrating convincingly that we have implemented the kind of robust systems and professional processes that they would expect internally.

- **Increasing data recipient participation:** the more platforms that participate with the Registry, and the more we are able to show we can solve the coordination problem on a global scale, the easier it will get to attract data recipients. Each additional platform connecting with our Registry will dramatically increase the benefits for data recipients, especially in these early stages as we move from one data source to two or three. Beyond scaling platform participation, we will also attract data recipients by refining how we do things, focusing on ensuring our processes are clear, fast and efficient, and by ensuring our requirements are accessible and suitable for a diverse range of applicants and downstream use-cases. This will require proactive engagement with multiple sectors and communities, including academics and research institutions, data intermediaries, and providers of agentic AI services, for example. We have launched the DTI Badge of Accreditation to award to all services that list on the Registry, in order to increase the value to each applicant beyond data access, and to further raise awareness of the Registry.
- **Ensuring the Registry is aligned with the aims of regulators:** as the requirements, processes, and our implementation of the Registry are refined and updated over time, we will seek to ensure that we achieve optimal alignment with the goals and requirements of relevant regulatory initiatives. In an ideal world, we wish to design the Registry such that it is simultaneously considered an appropriate component of compliance with regulatory requirements in different jurisdictions, even where the letter and objectives of those regulations may diverge considerably. For example, we intend for our Registry to be utilised by multiple gatekeepers in their compliance with Article 6(9) of the DMA in the EU, while also then being capable of fulfilling potential future obligations in the UK under a Digital Markets Smart Data Scheme, for example. While the draft EDPB-EC joint guidelines on the DMA-GDPR interplay explicitly demand light touch onboarding processes, the UK's Smart Data Programme refers to centralised accreditation with trust set as a central pillar of the schemes. We are implementing our Registry carefully to adopt the centre ground between these extremes. Where appropriate, and in line with DTI's mission and values, we will also consider submitting bids for the Registry to be more formally and explicitly adopted as a centralised accreditation function within a data sharing scheme. This would prevent unnecessary duplication, confusion, and cost, while also maximising the potential positive impacts of the regulatory initiative.
- **Driving towards greater interoperability:** streamlining the trust system is just one part of our longer term interoperability vision. We will also explore opportunities to work towards a more automated system for putting identifiers on data requests to multiple data sources, and implementing a unified suite of protocols that will work for all data transfer

parties. We view these as essential longer term building blocks to an efficient and effective data transfer ecosystem.

Without success in this area, we can expect to see a fragmented data portability landscape, where established global businesses face avoidable compliance costs, and the international expansion of smaller companies is held back by duplication, complexity, and inefficiency.

AI represents a particular area of challenge and opportunity for the future of the Data Trust Registry. AI agents need trust infrastructure. Some of that looks specifically at malware detection and other, technical-first approaches. But we see a key role for DTR to provide entity validation in this landscape, complementing other efforts to promote security and data protection in the Wild West AI landscape of today. Without effective entity validation, the risk is even greater than fragmentation – personal data leakage becomes a substantial concern, or reactions prompted by that fear lock down data and utility with it.

03 Data portability needs you

The vision set out in this document for the next four years is ambitious, but certainly achievable. We are confident the workstreams and projects we have under way will ensure we progress in each of our strategic objectives for more tools, more value, and more trust.

But we can't do this on our own. Even with perfect execution and unlimited resources, we can't force data portability onto the world. We will need other participants in the data transfer ecosystem to play their part.

This means technology companies building export functionality and participating in our community. We need platforms of all shapes and sizes to recognise that user empowerment is an opportunity, not a threat. This might require dedicating resources towards a project with no immediate commercial return.

It means a diverse group of founders, developers, and academics supporting our Data Trust Registry and collaborating in the ecosystem with feedback and dialogue, even when their resources are tight and the benefits are uncertain.

It means regulators around the world fully appreciating the importance of international interoperability between their overlapping initiatives, and recognising the Data Trust Registry as a component of their interventions. For some, this will be unconventional and may require a leap of faith.

And lastly, it will mean entrepreneurs taking risks and bringing forward new products, services or features. While many attempts will fail along the way, we know that consumers will ultimately be drawn towards the new services that show them real value, the features or integrations that save them money, and the innovations that make their lives easier. The closer we get to achieving our vision, the more we expect to see these real-world benefits materialise.

Interested in our work? Come and join the Data Transfer Initiative and help us to achieve this vision together.