DATA TRANSFER INITIATIVE

A vision for digital empowerment and freedom, through data portability

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About DTI

The Data Transfer Initiative (DTI) is an organization of policy experts and technologists partnering with industry leaders and collaborators to enhance data portability through the development of tools and standards. DTI works globally to deliver its mission statement: “empower people by building a vibrant ecosystem for simple and secure data transfers."

DTI upholds **five fundamental principles**: building for users, prioritizing privacy and security, embracing reciprocity, focusing on user's data, and respecting everyone. DTI applies these principles in practical ways, guiding product development and fostering discussions with users, platforms, nonprofits, academia, and governments to promote safe and effective data portability.

Vision

The European Union's new regulatory environment for common data spaces and the Digital Markets Act (DMA) presents a key opportunity to empower people to shape their digital futures. Data portability is at the core of making this agenda a reality. **With portability, we can build upon digital rights, and start talking about digital freedoms.**

Portability allows technology users to use personal data in the online services of their choice. This reorients markets to provide meaningful freedom to people, creating a virtuous cycle of competition, innovation, and individual empowerment. The impact of portability thus reaches far into the digital sector, transforming online safety and technology governance, including AI.

Four goals outline a framework for implementing this vision:

1. **Center data policy on people** - European Commission Vice President Vestager has framed the past decade of EU policy as built on a model of “tech to serve humans." In the same spirit, the model to guide the next ten years should be “data to serve humans."
2. **Advance fair and contestable markets through portability** - When people can move personal data, they can choose with their feet. Portability makes choices of digital service providers meaningful, thus aligning market incentives with consumer wishes.
3. **Promote safety through choice** - Transparency and accountability in platforms help govern how platforms moderate what users *say* online; and portability unlocks a future where users can gain more agency, and thus more safety, over what content they *see*.
4. **Steer AI systems toward good ends** - Alongside transparency and accountability, effective portability for individual data that powers personalized AI models will create a competitive marketplace for AI agents, promoting responsibility and reinforcing human agency over machines.

Freedom

No one likes feeling stuck. No service is perfect. People should have the freedom to explore alternatives. But it's not enough just to switch to a new website or a new app - without the right data, the experience can't be the same. A photo-sharing service without your photos isn't compelling, nor is a music streaming service without your carefully curated playlists. Data portability allows people to take their digital lives with them, creating room for ever more innovative, personalized, and higher quality online services.

But what about…?

- **Users who don't like having to make choices** - Portability doesn't require new choices to be made. Instead, it enables everyone to have the *option* to transfer their data.

- **Users who make bad choices** - Some individuals may select services that don't serve them well, for example those that allow disinformation and harmful speech. But limiting choice to only digital vegetables will increase division. Transparency, accountability, and empowerment through portability can help align incentives with values.

- **Security and privacy risks** - Trust is paramount for portability. Clear user authentication and authorization, together with a shared approach to establishing trust in third party services before performing direct data transfers, can go far to mitigate fraud and abuse.

- **Markets that don't provide good options** - It takes two to transfer data, and many users will choose to stay with big companies. However, investment and entrepreneurship fill gaps in markets and create compelling alternatives where current services fall short.

- **Other sources of lock-in effects** - Data portability is not the only potential obstacle to free choice. Access to platforms like operating systems and marketplaces can be complex. Portability is separate from, but complementary to, these discussions.

Opportunities

Key priorities for EU and Member States:

1. **Implement existing laws effectively** - In conjunction, the Data Act, Digital Markets Act, and Data Governance Act articulate a large number of new rules. Effective and harmonized implementation of these regulations will require time, resources, and extensive collaboration, including coordination with GDPR as well as transparency and accountability obligations and ongoing investigations. This should take priority over considering additional or new laws or frameworks.

2. **Build trust among providers** - Support the development and deployment of common, contextual trust practices to help shepherd portability's paradigm shift from downloads to direct third party transfers. Encourage adoption of shared trust practices through limited safe harbors and other incentives, and avoid forcing data transfers without robust authentication and other mechanisms to reduce risk.

3. **Promote technology neutrality** - A wide variety of service types and technologies can interconnect and exchange data through shared architectures and policies. Portability rules should promote coordination rather than homogeneity in approach.

4. **Invest in awareness and engagement** - Portability adoption and use can be greatly limited by sheer lack of broad knowledge and understanding. Helping to promote and explain the opportunities of portability to business and user audiences can greatly increase adoption and innovation.

5. **Assess portability in practice, not on paper** - Enforcement and metrics should encourage interoperable data transfers and shared practices to facilitate scaling, and should support user awareness of and empowerment in portability; raw quantitative counts of the number of users who transfer data won't measure these goals.