# **UN CSTD Workshops** on Data Governance

Unlocking potential through data sharing: The need for common principles

**Summary** 

#### **Workshop summary** I.

Member States, in paragraph 48 of the Global Digital Compact and in ECOSOC resolution 2024/14 have requested the United Nations Commission on Science and Technology for Development (CSTD) to engage in a comprehensive and inclusive multistakeholder dialogue on the fundamental principles of data governance at all levels, as relevant for development, within a dedicated working group.

To facilitate discussions on data governance principles and explore opportunities for leveraging data for development, the secretariat hosted an online workshop on data sharing on 16 September 2024, which also commemorated the United Nations International Day of Science, Technology, and Innovation for the South.

The discussion brought together insights from Ms. Clarisse Girot of the OECD, Ms. Malarvizhi Veerappan of the World Bank, and Mr. Christian Peukert from the University of Lausanne, focusing on the evolving landscape of data governance. The key topics revolved around:

Global data governance frameworks: The need for coherent and unified data governance frameworks that transcend sectors and jurisdictions.

Empowering users and stakeholders: Emphasizing the empowerment of enterprises, workers, citizens, and consumers through data sharing and access.

Balancing data use and protection: Exploring the dual nature of data use—its potential for positive outcomes and negative consequences—and the importance of mitigating risks.

Economic implications of data: Understanding how data shift economic power and the role of economic policies in data governance.

Challenges in implementation: Addressing contradictions in interpreting terms like "public interest" and the practical difficulties in implementing data governance principles effectively.

International cooperation and standards: Highlighting the significance of international principles and multi-stakeholder models in fostering cross-border data flows and global collaboration.

Regulatory trade-offs: Examining the unintended consequences of data regulations, such as increased market concentration and reduced innovation.



### **CSTD-UNCTAD Workshop on Data Governance Principles**

## UNLOCKING POTENTIAL **THROUGH DATA SHARING:** THE NEED FOR COMMON **PRINCIPLES**

#### II. **Programme**

16 September 2024, 15:00 to 16:15 (CEST) Online

15:00–15:10		Opening r	emarks
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H.E. Ambassador Muhammadou Kah, Chair of the UN Commission on Science and Technology for Development (CSTD), Permanent Representative of the Gambia to the United Nations Office at Geneva

The event is moderated by Mr. Angel González Sanz, Chief of Technology, Innovation and Knowledge Development Branch, UN Trade and Development (UNCTAD)

#### 15:10-15:40 **Panellists**

Ms. Clarisse Girot, Head, Data Flows, Governance and Privacy Presentation 1 (DGP) Unit, Directorate for Science, Technology and Innovation

(STI), Organisation for Economic Cooperation and Development

(OECD)

Presentation 2 Ms. Malarvizhi Veerappan, Report Manager, World Development

Report 2021: Data for Better Lives; Senior Data Scientist, World

Bank Group

Presentation 3 Mr. Christian Peukert, Associate Professor of Digitization,

Innovation and Intellectual Property, HEC Lausanne (Faculty of

Business and Economics), University of Lausanne

15:40-16:15 Q&A



#### III. **Openning remarks**

#### H.E. Ambassador Muhammadou Kah, CSTD Chair

The CSTD Chair welcomed attendees to the CSTD Online Workshop on "Unlocking Potential Through Data Sharing: The Need for Common Principles." His Excellency emphasized the growing importance of data in today's digital age, noting that it is essential for innovation, economic growth, and social development. Governments and stakeholders must prioritize data literacy and strengthen domestic capabilities in data management to ensure inclusive growth and participation in the global digital economy.

The CSTD Chair highlighted the urgency of developing global frameworks for data governance that include development and equity dimensions, especially to tackle global challenges like climate change and pandemics. The United Nations Commission on Science and Technology for Development (CSTD) has been tasked with establishing a multistakeholder Working Group on fundamental principles of data governance, in line with the final text of the Global Digital Compact and ECOSOC Resolution E/RES/2024/14.

This Working Group will report on its progress to the General Assembly by September 2026, providing recommendations on data governance. These recommendations will address data sharing, cross-border data flows, and the safe and secure handling of data, among other topics.

The CSTD Chair highlighted the importance of inclusivity, fairness, and collaboration in shaping the future of data governance. His Excellency expressed hope that the workshop would contribute valuable insights to help the CSTD tackle the challenges ahead.

#### IV. Interventions

#### Ms. Clarisse Girot, OECD

Data governance has been a central focus at the OECD for many years, particularly in areas like health data management and private sector information handling. The OECD's privacy guidelines have historically served as a foundational basis for global privacy laws. However, as more legal instruments have emerged worldwide, the necessity for a more coherent and unified data governance framework has become apparent—especially as data access and sharing increasingly transcend sectors and jurisdictions.

An important text adopted in 2021 is the Recommendation of the Council on Enhancing Access to and Sharing of Data (EASD). This recommendation has influenced national data policies not only in OECD countries but also beyond, making it highly relevant on a global scale.

The idea behind the EASD recommendation was to make various OECD initiatives on data interoperable, facilitating collaboration and harnessing data sources to foster datadriven scientific discoveries and innovations, especially across both the private and



public sectors. This came against the backdrop of pressing issues like the COVID-19 crisis, environmental challenges, and other global emergencies, where data sharing could help address these issues, boost growth, and enhance social welfare and wellbeing.

A key focus of the EASD recommendation is empowering users of digital goods and services—enterprises, workers, citizens, and consumers—through data sharing and access. This mindset guided the drafters of the recommendation, which provides policy guidance in the form of general principles to help countries develop the capacity to benefit from data both domestically and across borders.

Rather than going into detail about all the principles, it is worth highlighting that the recommendation has influenced how countries maximize the benefits of enhanced data access and sharing arrangements, while protecting the rights of individuals and organizations, and balancing legitimate interests and objectives.

This OECD recommendation adopts a strategic, whole-government approach to data access and sharing. Beyond legal aspects, it also addresses how to stimulate investment in data and incentivize data sharing. It covers issues such as skills development and measures to enhance stakeholders' capacity to responsibly use data throughout the entire data lifecycle.

A particularly relevant point is how the recommendation fosters responsible data access, whether domestically or across borders. Trust is central to this, with the recommendation aiming to minimize restrictions on cross-border data flows—critical for global public interests—while ensuring privacy, intellectual property rights, and access to public information.

Several key OECD texts, including the privacy guidelines and recommendations on health data governance, complement the EASD recommendation. One takeaway from this broader initiative on data is the importance of maximizing opportunities for better data governance and sharing. For instance, cross-border and health data sharing is vital for research in the public interest, such as large-scale research efforts during the COVID-19 pandemic. Comprehensive cohorts with diverse participants are essential, as underrepresentation can lead to biases and hinder public interest research.

At the implementation level, contradictions often arise in interpreting terms like "public interest." This interpretation can be inconsistent, creating a chilling effect for organizations operating across borders. As a result, many default to using consent mechanisms rather than relying on the public interest standard. However, consent-based models often fall short. Individuals may sign off on the use of their data without fully understanding the implications, especially due to issues like literacy and health literacy. This problem is present even in developed countries, and it is more pronounced in developing nations.

To address these challenges, there is a need to complement the principles outlined in the EASD recommendation with targeted projects. These initiatives will help ensure that these principles are implemented effectively and are adapted to local contexts.

#### Ms. Malarvizhi Veerappan, World Bank

The World Bank has long been an advocate for advancing the data agenda, focusing on three key areas. First, internal data governance ensures that the World Bank manages its own data effectively. Second, the World Bank integrates data governance discussions into country engagements, particularly within lending operations. Third, there is a strong emphasis in the World Bank on building a knowledge base by documenting lessons learned, outcomes achieved, and challenges countries face in implementing data governance.

The global data landscape has evolved dramatically. The traditional distinction between data producers and consumers has blurred. Now, everyone both produces and engages with data. The use of data can lead to positive outcomes, such as greater accountability, individual empowerment, and business opportunities. However, data use can also result in negative consequences like increased surveillance and widening inequality. Therefore, the essence of data governance discussions is shifting from solely producing data to improving its use. This is why the World Bank's data framework emphasizes the reuse and repurposing of data, aiming to maximize its positive impact while mitigating risks.

The data governance framework of the World Bank emphasizes several key components. First is the infrastructure, ensuring that people and countries are connected through laws and regulations that adapt to the changing nature of the data landscape. Second, economic policies are critical, as the way data are used can significantly impact the real economy, particularly in areas like antitrust, trade, and taxation. Third, institutional capabilities play a vital role, with institutions reinventing themselves to leverage data analytics and make effective use of data. This is not only important for public use and the global public good, but also directly impacts how governments deliver services and empower citizens.

There are two primary layers of data governance frameworks: national and international. Regulations and data governance frameworks established at the national level directly impact how data flows across borders at the international level. Work is needed at both levels to bring together best practices, framing national data governance frameworks in a way that aligns with local cultural contexts. At the same time, these frameworks must integrate with international standards to promote cross-border data flows where necessary and appropriate.

The distinction between types of data can become blurred, as data that begin as a public good can become highly sensitive when merged with other data types. Therefore, a



complex, multi-dimensional framework is required—one that considers the types of data, actors, and transactions involved.

This complexity is illustrated through a mapping done by the World Bank of key data governance functions within government entities. For instance, a mapping exercise showed that in many low- and middle-income countries, entities like data governance bodies, cybersecurity agencies, and data protection authorities are either not prevalent or not fully functional. The focus should be on the effectiveness of these institutions, as the mere existence of policies or entities without delivering on their intended roles does not bring the desired benefits.

The earlier speaker from the OECD emphasized the importance of incentives in encouraging the adoption of these principles and driving change in how people engage with data. In various reports, including those by the World Bank, a key focus has been on change management and the importance of fostering a mindset shift across all levels of engagement with data.

A culture of data use and a mindset shift at all levels is crucial, from senior leadership to people at the working level. Several points emphasize what makes institutions deliver effective data governance. The UNCTAD Data for Development report highlights both hard law and soft law aspects of data governance, mirroring many of these discussions. A key takeaway is that data governance approaches must adopt a multi-stakeholder model. It cannot be solely state-led or civil society-led. All stakeholders need to be involved for a holistic approach to data governance.

Awareness of new regulations and ongoing global sector work is essential. For instance, in the health sector, there are ongoing discussions on digital health and health data governance, with different sets of data principles being widely disseminated. These principles align with broader goals of value, trust, and equity. Other regulations, such as those around AI, are also critical, given their strong link to how data governance policies will be framed in various countries. The World Bank has also published sector-specific G20 implementation briefs, covering topics like cybersecurity, data governance, and digital health. These efforts underline the significance of effective data governance and data use.

On the global level, there is a growing consensus around the development of universal principles for data governance. The United Nations system's Chief Executive Board for Coordination is actively working on a high-level set of principles, which have been endorsed in a document on international data governance. The goal is to establish universal principles that foster understanding and change behaviours, embedding a culture of data governance into various frameworks that countries are building.

Several reports, including those from the High-Level Advisory Board on Effective Multilateralism and the Lancet and Financial Times Commission on governing health



futures 2030: growing up in a digital world, also emphasize the importance of these principles. The proposed principles are based on value, trust, and equity, with a focus on inclusivity, fairness, non-discrimination, and data stewardship. Data quality is a key priority, and there is a strong alignment with a human rights-based approach to data governance, which emphasizes the need for data protection before use.

A critical point in this discussion is the untapped potential of data. The World Bank advocates for a new social contract for data, aimed at improving data sharing, standards, and quality. This social contract rests on three pillars: value, equity, and trust.

The value pillar of the World Bank approach to data governance emphasizes that participants in a data agreement must benefit from the arrangement. More access to and sharing of data creates value, especially when data are integrated across silos. Second, equity ensures that all participants, including those in poorer countries, can benefit from the data. For the social contract to be sustainable, everyone must gain something. Third, trust is paramount as the risk of data misuse grows, with concerns such as cybercrime, surveillance, and biased algorithms.

To address these concerns, society as a whole must engage in dialogue to develop a social contract for data that reflects the diversity of cultures, values, and laws. However, all social contracts must be grounded in value, trust, and equity.

This thinking aligns with the work of the international data governance group led by UN Commission on Science and Technology for Development (CSTD). It integrates key pillars into a broader framework, emphasizing infrastructure, laws, regulations, economic policies, and institutional capabilities. The framework supports countries in adapting to the changing nature of data, ensuring that both national and international data governance frameworks facilitate cross-border data flows where appropriate.

In conclusion, the development of a global consensus on data governance principles is critical for changing behaviours and fostering collaboration across all levels of society. Further discussions will help explore how to implement these principles and maximize the potential of data for public good.

#### Mr. Christian Peukert, University of Lausanne

Data are a key input for AI, and we can broadly distinguish three types of data used in various applications. First, there is behavioural data, which includes actions, reactions, and patterns from sources like web browsing or app interactions. This data type is mainly used to optimize online ads. Second, sensor data come from physical devices, often connected through the Internet of Things, and is commonly applied in robotics. Lastly, a more recent focus has been on human-generated content—text, images, audio, and video—which is essential for generative AI applications.



From an economist's perspective, the importance of data lies in their ability to shift economic power. Access to information can influence both the demand and supply sides. For example, firms can use data to charge personalized prices, while consumers can leverage Internet data to find lower-priced products that match their preferences.

A more interesting aspect of data is their externalities. As previous speakers noted, sharing data can generate valuable societal insights, such as in healthcare. However, there is also a downside: data disclosure can allow digital platforms to infer information about non-disclosing individuals based on shared characteristics with users. This enables platforms to target ads or make other inferences.

Another key point in the economics of data is the concept of diminishing returns. While more data can improve the accuracy of predictions or models, the rate of improvement decreases over time. Eventually, there is a limit to what can be learned from a given dataset. In a dynamic environment, regular access to fresh data becomes crucial, especially once a "data wall" is reached, where further learning from a dataset is exhausted.

This introduces the idea of stock versus flow. While the available stock of data online is vast—much of it created before its commercial value was realized—there are cases where tapping into that existing stock is sufficient. For example, in certain applications like image recognition, the stock of data on something like cat images may already be exhaustive, as cats are not likely to change how they look from one day to the next.

In certain applications, the flow of data becomes crucial in a dynamic world where the stock of data can become outdated. Today's information is more relevant than yesterday's information, and this continuous flow of updated data is key for businesses. However, the flow of data is endogenously determined, meaning it depends on whether individuals or organizations choose to provide it, which in turn is driven by economic incentives. People may decide to share their data regularly, or they may choose not to.

This raises the question of whether there is a role for regulation to ensure that data are shared more consistently. For instance, the European Union's AI Act, which came into force in August 2024, includes Article 10. It states that training, validation, and testing datasets must be relevant, sufficiently representative, free of errors, and as complete as possible for their intended purpose. However, if data providers have the incentive and ability to withhold their data, this can conflict with these regulatory requirements.

One perspective on this issue is the concept of exclusive rights, such as copyright over data. If someone holds exclusive rights to a dataset, they can decide whether or not to share it. This creates a potential conflict with the EU AI Act's goal of representative and complete datasets, as data providers may choose not to participate in Al datasets.



A recent study shows that many websites are increasingly restricting their data, with about half of them now limiting access to AI training datasets. This reduces the diversity and scalability of AI systems, making the available data less representative than before.

In another study conducted by the University of Lausanne, researchers looked at a stock photo website that released images for AI training. After the release, many photographers either deleted their accounts or uploaded fewer images. Those who continued to upload provided less novel or interesting content. This shows how the incentives of data providers can significantly affect the availability and quality of the data flow, which is essential for AI development.

The EU General Data Protection Regulation (GDPR) applies to companies that offer goods or services to individuals in the EU, regardless of whether those companies are physically located in the EU. Essentially, the EU extends its regulatory reach beyond its borders to companies interacting with EU customers. For instance, firms outside the EU must still comply with the GDPR if they deal with EU customers.

This brings us to the concept of the "Brussels Effect," a term coined by Stanford Professor Anu Bradford. This effect occurs when firms, regardless of legal obligation, voluntarily comply with the highest regulatory standards set by the EU, even if they are not legally required to do so. The GDPR serves as a useful example of global data governance, as one jurisdiction's law can influence practices worldwide.

Looking at the empirical research conducted after the GDPR's introduction, there is evidence of this effect. When comparing websites targeting both EU and non-EU markets, as well as websites headquartered inside and outside the EU, a clear trend emerged: after the introduction of the GDPR, there was a reduction in the number of cookies sent to consumers across all websites. This decrease occurred even in regions where the GDPR has no legal authority.

While the GDPR demonstrates that privacy regulations can be effective—evidenced by reduced cookie usage—there are trade-offs to consider. Privacy protection, intellectual property rights, copyrights, trade secrets, and innovation often intersect, creating a balance that needs to be carefully managed in global data governance.

For instance, GDPR has been shown to increase market concentration, where companies like Google benefit the most, while smaller firms are forced out. Additionally, the regulation has led to reduced technology venture funding on the investment side, and there has been a notable increase in app exits from the mobile app market after GDPR implementation. In the manufacturing sector, GDPR has shifted innovation from radical to more incremental product development.

Switching perspectives to copyright as a way of restricting data access, a recent study found that countries with copyright exceptions allowing for text and data mining see less



R&D in AI and fewer AI commercialization efforts. From a global perspective, the availability of these exceptions varies widely. This difference in copyright openness correlates with outcomes in research, code development, patents, and new ventures.

Policymakers must consider research and development, business goals, and societal interests, as well as the perspectives of data holders, including those related to intellectual property, copyright, trade secrets, and personal privacy.

#### V. **Q&A** session

#### Question 1 on maturity assessment tools for national data governance

(Infoware Consulting, Abuja, Nigeria)

The question relates to non-OECD countries. For countries that have reached a certain level of maturity in implementing data governance regulations and frameworks, is there a specific model or maturity assessment tool that can be applied at the national level as a starting point for implementation?

As discussed, equity and collaboration—both North-South and South-South—are critical. Information on any tools or models that have been successfully used would be appreciated.

#### OECD answer

It is crucial to understand that data governance frameworks heavily depend on implementation. The principles can be similar across the board, but their application is key.

For example, as a privacy lawyer by background, with experience at the French Data Protection Authority and collaborations through the Global Privacy Assembly, it is clear that starting from the same principles is essential. However, sophisticated frameworks, such as those with established data protection authorities, cannot simply be transplanted into countries in Africa or even ASEAN countries.

It is important to encourage holistic, multi-stakeholder participation when setting up new digital economies, especially in contexts where infrastructure might be less developed. This is a challenge even in the most developed countries, not just in developing ones. Data protection authorities, which regulate both public and private sectors, face the delicate task of maintaining their independence while contributing to the growth of the digital economy.

Balancing this independence, providing appropriate budgets, and ensuring their role in the development of digital governance is crucial. In some jurisdictions, authorities struggle due to limited resources, which hampers their ability to contribute effectively.



Although this does not directly answer the question, the main point is that overarching data governance principles, such as those from the World Bank or the OECD, do work. However, successful implementation requires close attention, as this is where differences will emerge.

#### World Bank's answer

Just because one country is doing well does not mean that exact model can be directly transferred to another context. It is crucial to consider the local context and the specific problems being addressed. When conducting an assessment, it is important to begin by identifying the problem you are trying to solve. There has been a lot of focus on assessments, but sometimes the challenge lies in translating these into scalable solutions that tackle implementation issues.

While there are guidelines available, it is important to design a toolkit or assessment based on the context and the particular issues at hand. For example, in the health sector, particularly for those working in HIV, there is the Global Digital Health Monitor, which provides insights into how different countries are progressing in this area.

#### University of Lausanne's answer

A key point to consider when thinking about new regulations for the data economy is the interaction between distinct legal areas, such as privacy law and competition law. These areas cannot be viewed independently—addressing one often has consequences for the other. This insight has been highlighted in a lot of academic research over the past one or two years. Traditional regulatory structures require a different approach, as the data economy operates very differently from the traditional one.

#### Question 2 on balancing simplicity with complexity in evolving data regulations

(German Development Agency (GIZ), Bonn, Germany)

One way to reduce complexity is to adopt existing frameworks, under the assumption that they represent some kind of standard. In Africa, similar to discussions happening in Europe, there is an ongoing debate about whether GDPR is still suitable given the rapid technological changes. This brings up the question of "fitness for purpose"—regulations need to work for their specific settings, but we're dealing with constantly shifting goalposts as technology evolves. How do we manage this balance between adopting simpler solutions due to complexity while ensuring they are fit for the current purpose in different markets?

The worst approach might be to simply copy frameworks that were established five or ten years ago, as everything is rapidly changing. So, what should be done in such a setting? Should the focus shift to higher principles that provide a broad framework? What advice is there for first movers who cannot wait for systems to reach full maturity?



#### **OECD Answer**

It is extremely difficult to measure and gather evidence, even for organizations like the OECD, which focuses heavily on data and data flows. There is no hard evidence available that allows for reliable rankings or policy assessments of existing data governance frameworks.

Second, it is important not to stray too far from established principles. It is critical to understand the principles behind existing data governance frameworks. These principles enable greater cooperation, especially in enforcement. Divergent laws or scopes, or differences in data protection authorities' competencies, can hinder cooperation across borders.

For example, in the EU, where data protection authorities have strong networks and infrastructures, enforcement is possible, albeit time-consuming and costly. In contrast, smaller authorities or those in jurisdictions with limited budgets may not prioritize enforcement due to resource constraints. Instead, their focus might be on capacity building, outreach, and fostering a privacy culture.

This prioritization is not dictated by law but by practical necessity and resource management.

#### Question 3 on open data systems

(Central Bank of Nigeria, Abuja, Nigeria)

This conversation is very timely because the effectiveness of digital platforms, for example, has largely been built on open systems—open knowledge, open data, open networks, and more. However, discussions around data privacy often act as a barrier to these open systems. What are some of the critical factors that would help in building digital public-private infrastructures in today's world, where open data and AI are essential, but without stifling innovation through overly strict regulation and governance?

#### University of Lausanne's answer

When building digital regulation from scratch, one approach is to carefully examine what other countries have done and also evaluate the results of their efforts. Rather than relying solely on official reports published by regulators, it is crucial to consider independent academic research, which often provides a deeper analysis of what worked well and what did not. Learning from these examples and avoiding the pitfalls observed in other contexts can help create more effective and well-informed regulatory frameworks.

#### World Bank's answer

It is important to continuously push for a policy environment and whole of government data governance to build a balance set of enables to promote use and safeguards to protect data (which in turn will promote more data disclosures).



#### VI. **Concluding remarks**

#### **CSTD Chair**

It is crucial for data governance frameworks to better support the participation of leastdeveloped countries, unlocking their potential for effective, efficient, and adaptable data sharing that considers contextual issues. This is an important factor to reflect on as we navigate this critical space. Enhancing data governance frameworks in these contexts requires establishing universally acceptable principles for data sharing, prioritizing elements like trust, transparency, and accountability.

These principles should also include guidelines on data ownership, usage rights, and ethical considerations. A human rights-based approach to data, mentioned earlier, should be factored in before data is used in AI. Additionally, partnerships between governments, the private sector, and civil society are essential for a cohesive approach to data governance, allowing for aligned interests and shared best practices.

Many developing countries, particularly in Africa, face challenges related to capacity building, training, and resources for effective data management and governance. International organizations must include skills development in data analysis, privacy protection, and cybersecurity in their development programs. Without this focus, the equity gap will widen.

It is also essential to create data governance policies that incorporate the voices of vulnerable and marginalized communities to ensure equitable access and use of data. Usability and interoperability standards are key to facilitating seamless data sharing across platforms, enabling meaningful participation in global data exchanges.

Robust data protection regulations are needed to safeguard personal and national information without stifling creativity and collaboration. Building public trust in datasharing initiatives is vital, particularly in areas like health, agriculture, climate, and the environment.

Finally, monitoring and evaluating the impact of data-sharing initiatives is essential to ensure that objectives are met and adapted to changing circumstances. Establishing agile mechanisms for this purpose is critical.

These are just a few thoughts, and I want to thank the panellists for a highly insightful discussion on this important topic. Continued engagement and collaboration are necessary to advance this agenda.

#### Moderator

Many conversations on data governance have focused so far on data protection, which is certainly an important part of data governance. However, it is not the entire discussion, particularly from a developing country perspective. It is essential to ensure that data



governance also focuses on generating value for participants in these systems, and that this value is distributed equitably. This broader approach is key to ensuring that the benefits of data governance are shared fairly.



#### VII. Additional sources and literature

- 1. G20 Data Gaps Initiative
- 2. Global Data Regulation Diagnostic Survey Dataset 2021 (worldbank.org)
- 3. Global Digital Health Monitor
- 4. Implementation Know-how Briefs to Support Countries to Prioritize, Connect and Scale for a Digital-in-Health Future - Open Knowledge Repository (worldbank.org)
- 5. Johnson, G. (2022). Economic research on privacy regulation: Lessons from the GDPR and beyond. NBER Working Paper
- 6. OECD Recommendation on Health Data Governance
- 7. World Bank (2021). World Development Report 2021 Data for Better Lives. Washington, DC

