



Global Institute for  
Structure relevance,  
Anonymity and  
Decentralisation i.G.

**GISAD statement on [https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13290-Travel-better-protection-for-passengers-and-their-rights\\_en](https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13290-Travel-better-protection-for-passengers-and-their-rights_en) .**

GISAD (Global Institute for Structure relevance, Anonymity and Decentralisation i.G.) is an institute in founding. GISAD wants to develop a digital system (EU-D-S) from the perspective of the citizens of Europe, which can hold its own in system competition with gatekeepers and a social credit system.

The aim of GISAD is to support the creation of a holistic Marshall Plan, as called for by the President of the European Commission, Ursula von der Leyen. The core of the Marshall Plan must be a digital concept adapted to civil rights and diversity. If individual measures are taken without an overall system of their own, Europe runs the risk of losing the system competition to other economic areas such as a centrally controlled China.

- GISAD's opinion is subject to the proviso that it is to be as part of an overall digital concept understood (multiple use of the same infrastructure without additional costs).

GISAD has defined three goals on which a Marshall Plan should focus:

1. The optimal refinement and simple exploitation of digital data, while maintaining diversity and performance-adopted involvement of all parties involved in the value creation.
2. The stigma-free, lifelong digital inclusion of all citizens with incentives for self-development.
3. The digital guarantee of the necessary state tasks to maintain security for citizens, the economy and the state, while preserving pre-digital democratic achievements.

### **Challenges:**

GISAD welcomes the initiative better protection for passengers. However, it is unlikely that only a legal framework can achieve the challenges in terms of optimal flexibility of travel and integration of all private and public mobility providers. GISAD has already commented on modular mobility <http://gisad.eu/en-eu-initiative-multimodal-digital-mobility-services/> . The EU-D-S offers the EU the opportunity to design a proactive legal framework. In doing so should be the technical possibilities of a modular infrastructure defined in terms of consumers and aligned with the necessary legal safeguards by design.

Against this background, GISAD favours option 3 of a comprehensive revision of the regulatory framework. Passenger rights are best protected by offering small European companies a legal framework that does not put them at a disadvantage vis-à-vis foreign gatekeepers.

**Solutions proposed by GISAD in the context of an overall EU-D-S system:**

- The commercialisation of sensitive personal data can be ruled out as personal data is not stored in the EU D-S. Nevertheless will be a perpetrator of abuse clearly identified in individual cases and after a court order by means of digital forensic traces. The legal framework must be adapted in such a way that the data protection realised by design offers mobility providers and passengers optimal connectivity.
- Queries and consent forms may only be once from passengers requested on their first visit to the EU-D-S on the data protection procedures agreed with the legislator.
- The EU-D-S will be in each of the 24 language areas provided by a cooperative. The legal framework of the cooperative should be with the EU agreed. All cooperative members have equal access to the generated mobility data. Every European mobility provider has the right to become a cooperative member. In this way can be discrimination largely excluded. The EU has the guaranteed right of legal intervention over all providers.
- The fact that are according to language areas the cooperatives divided and not according to countries avoids that individual EU countries support national solo efforts. Most languages are as an official language or at least as a recognised minority/regional language in several countries spoken.