



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/13256-Data-Protection-Regulation-for-EU-institutions-bodies-offices-and-agencies-report-on-application\\_en](https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13256-Data-Protection-Regulation-for-EU-institutions-bodies-offices-and-agencies-report-on-application_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 review of the Data Protection Regulation for EU institutions, bodies and agencies. GISAD has already expressed its views on a general data protection by design approach on several occasions, for example at <https://gisad.eu/de-eu-initiative-datengesetz-und-geaenderte-vorschriften-ueber-den-rechtlichen-schutz-von-datenbanken/>.

First and foremost, GISAD takes a stand on data protection from the perspective of citizens who contact the EU. This also results in demands for the handling of citizens' data within and between the EU institutions. The EU institutions should set an example. The concept presented here is also transferable to authorities in the individual states.

Every employee of the EU is also a citizen. If the fundamental problems for all citizens are solved, the problems of the authorities are also solved.

Even the term "data protection" shows that we are thinking in the wrong direction. In the context of digitalisation, the most successful society is the one that uses the available data optimally for the benefit of the general public. However, this is only possible if the "data reference to persons" is protected.

### **Benefits of introducing an EU D-S for all EU citizens:**

Currently, an increasing amount of effort is being put into ensuring data protection in business and public authorities. A concept once thought through to the end by design, as developed for the EU-D-S, pays for itself within a very short time, as the essential effort of dealing with data protection is eliminated.

- Contacting the EU-D-S is also possible without a "data reference to persons". Accordingly, hurdles for citizens to contact the EU are reduced. A digitally supported questioning process can be used to pass on information from the competent state authorities to the EU. Even children must be able to report abuse in the simplest way possible. In the EU-D-S, it is technically ensured that in individual cases and after a court order, anonymity can be lifted outside an authority and in cases of authorisation within an authority via a trust station.
- As the data cannot be linked to individuals via the internet, the data can be used by EU institutions in the public interest without further scrutiny. This in turn allows for timely planning in response to citizens' interests and challenges.
- At present, communication between citizens and authorities is increasingly taking place via e-mail, unencrypted and visible to anyone who wants it. This alone establishes a link to a person, even if this is not necessary for the processing of an individual case. Discrimination is a widespread human behaviour and can only be ruled out if certain contents can be processed without regard to the person, because without knowledge of the personal reference. In the EU-D-S, communication is encrypted without third parties being able to listen in via backdoors.
- By restricting trust stations to establish the personal reference after authorisation request, the other employees are relieved of the responsibility of violating the protection of personal data. Accordingly, there is no need for extensive instructions.
- Small organisations are not able to ensure the same level of effort in protecting the reference to persons as large organisations. Their discrimination can be eliminated by the fact that they can use existing trust stations of large institutions to establish the personal reference.
- Citizens are also discouraged from giving consent to the use of cookies and consent to the data protection rules on every single website. Within the EU-D-S, a binding behaviour of all participants is technically determined. Such consent per individual case is not applicable. This also eliminates discrimination against smaller organisations.