



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/13180-Access-to-vehicle-data-functions-and-resources_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 EU Commission's initiative to regulate access to vehicle data. Appropriate is option 3, to impose legal requirements in addition to prescribing a list of the data. The customer can remain largely anonymous if the state of the art is exhausted. For example, 1,000 IP addresses can be made available per user, which are used randomly, as described in patent application DE102017005550 (A1). Car sharing would work in such a way that each driver uses a random IP address for which no personalised data can be found on the Internet. In the event of an accident, the IP address can be matched via a trust station and thus personalisation can be carried out without the car manufacturer being able to trace the personalisation.

DE102016002956 (A1) describes for the smart home sector how the customer obtains real power of disposal over his data. This is transferable to the vehicle sector. Basically, there is only an anonymous, uni-directional data connection, as has been known for a long time with the data diode. The vehicle can therefore only send data, but not receive data. Compromise of the vehicle or misuse are largely excluded.

Only temporarily is a bidirectional connection actively activated by the user. A sharing customer could sit in the car and deposit his credit card bi-directionally to activate the vehicle. During the journey, a uni-directional connection is sufficient, which records the distance travelled. A bidirectional connection may have to be activated again for payment.

Against this background, GISAD proposes the following measures:

- In addition to a list of the data, functions and resources provided, also regulate which data and for which occasion should be provided uni-directionally or bi-directionally.
- Ensure that personalisation via the internet may only take place in individual cases, as a rule after a court order. In return, personalised data must not be accessible via the internet.
- - For certain exceptional cases, such as an accident, to allow automatic switching from uni-directional to bi-directional interfaces.
- - In certain exceptional cases, such as an accident, ensure that personalisation can be established via a trust station.