



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/13241-Open-finance-framework-enabling-data-sharing-and-third-party-access-in-the-financial-sector_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 for a data-driven financial system. The focus of this initiative should not be further regulation of existing payment services. It is unrealistic to think that the GDPR can be used to regulate customers' control over their personal data. A real power of disposal over the data only exists if the personal data is not stored on the internet at all. If one wants to achieve the facilitation of access to data and its further use, business models that function WAN anonymously (Wide Area Network anonymously) should be supported by law. GISAD has presented a concept to this effect as part of the initiative for a digital euro at <https://gisad.eu/de-eu-initiative-ein-digitaler-euro-fuer-die-eu/>. According to the motto "control is better than trust", customers will give up their mistrust if they are given real power of disposal over their personal data. Risks in the use of WAN anonymous data are low.

Creating fair business models and ensuring a level playing field can only be achieved in a WAN anonymous ecosystem where - as proposed by GISAD - one cooperative is established per language area. In the cooperative, small companies have the same rights as large companies.

Against this background, GISAD proposes the following measures:

- The existing payment services should not be further regulated. Rather, operability should be established with a WAN anonymous European ecosystem in the EU-D-S.
- As already suggested, GISAD should be founded as a central clearing house and a cooperative for each language area.
- There is the potential to introduce the digital euro across EU borders, making it easier for consumers in countries with a different national currency to pay. The automatic conversion of the national currency and display in euros is technically not a problem.
- As settlement continues to take place in the background via a Euro Bank account, the conditions of PSD2 are fulfilled.
- Where necessary, the GDPR and other relevant laws should be aligned with the EU D-S. In particular, there is a need to clarify under which circumstances personal data will be made available to third parties by the trust station integrated into the EU D-S. The authorisation requirements for trust stations also need to be regulated.