

Reconciling Solid with the EU data spaces paradigm: a revolution of the status quo or business as usual?

Andrés CHOMCZYK PENEDO

Postdoctoral research fellow – ICADE (Comillas)

Affiliated researcher – LSTS / Senior fellow – BPH (VUB)

4th Solid Symposium - 4th Privacy & Personal Data Management Session

May 1, 2026 - London



COMILLAS
UNIVERSIDAD PONTIFICIA

ICAI

ICADE

CIHS

From to policy to regulation: what is a data space in the EU?

[comillas.edu](https://www.comillas.edu)

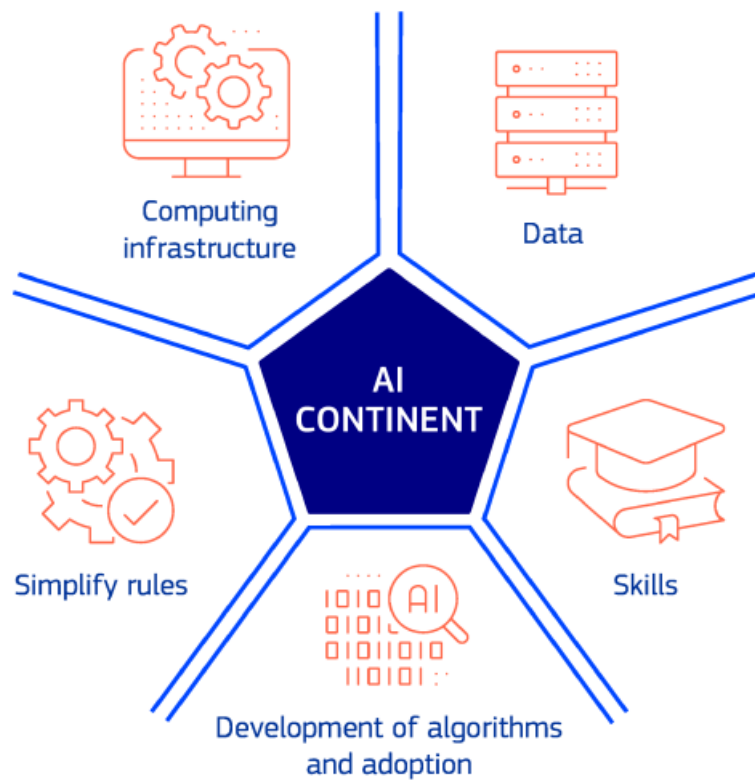




COMILLAS
UNIVERSIDAD PONTIFICIA

ICAI ICADE CIHS

One data space to rule them all...



Source: European Commission, AI Continent Action Plan, 2025





COMILLAS
UNIVERSIDAD PONTIFICIA

ICAI

ICADE

CIHS



[comillas.edu](https://www.comillas.edu)

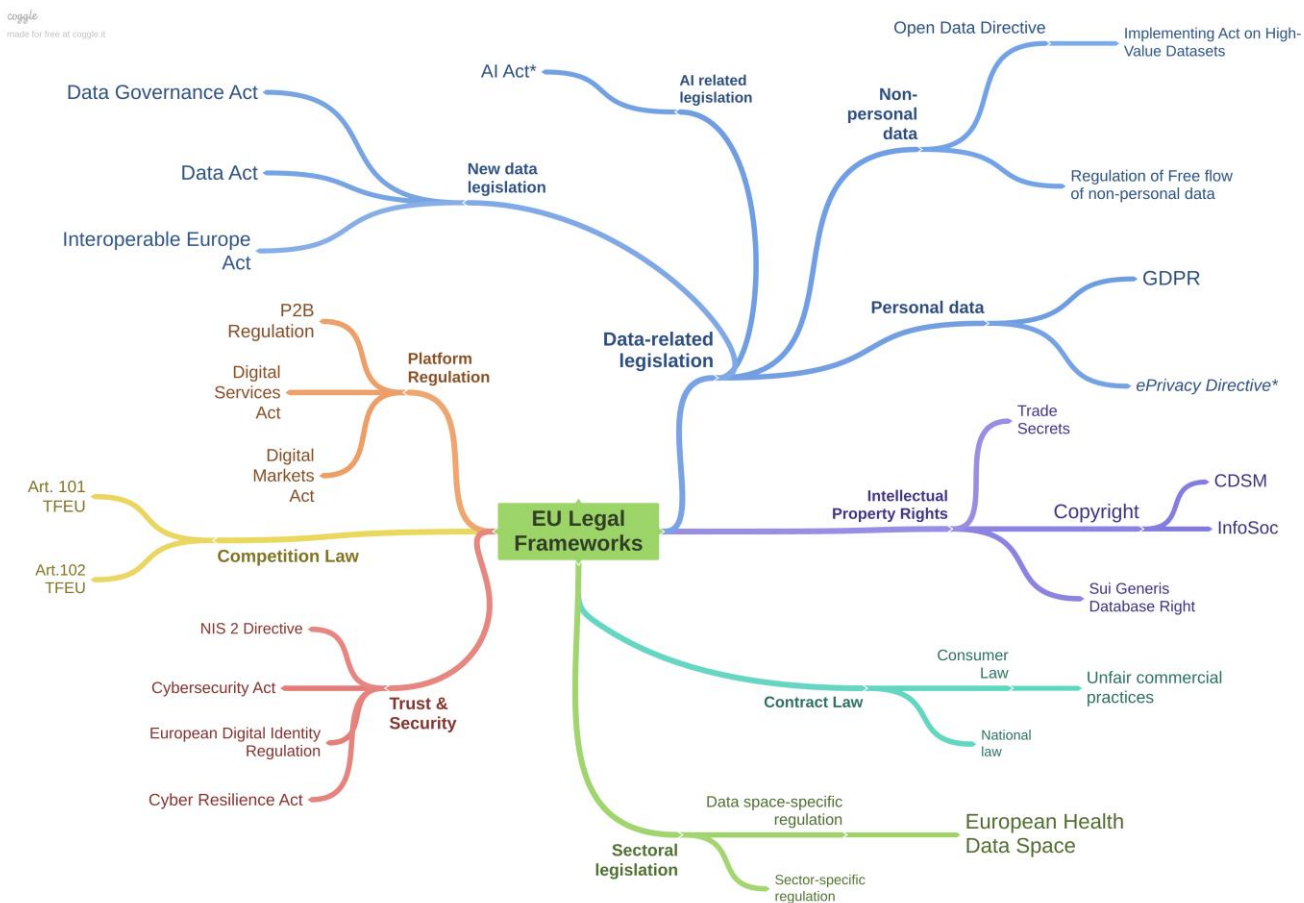




COMILLAS
UNIVERSIDAD PONTIFICIA

ICA I CADE CIHS

Navigating the regulatory (data) space



Source: Data Space Support Center, Blueprint 3.0



From Brussels with love: the policy origins (I)

'The Commission will launch a consultation process on the concept of user-controlled cloud-based technologies for storage and use of personal data ("personal data spaces"), and support R&I on tools to assist users in selecting the data sharing policies that best match their needs. It will also support projects aiming at reducing personal data breaches and ensuring that data is used in ways compatible with those for which it was collected.'

European Commission, Towards a thriving data-driven economy, 2014

'(...) [A] seamless digital area with the scale that will enable the development of new products and services based on data'

European Commission, Towards a common European data space, 2018



From Brussels with love: the policy origins (II)

'Common European Data Spaces are data-sharing ecosystems built on cloud infrastructure and clear governance rules defining who can access, use, and share data. They connect public and private actors around trusted mechanisms for data exchange within and across sectors.'

European Commission, Data Union Strategy: Unlocking data for AI, 2025





COMILLAS
UNIVERSIDAD PONTIFICIA

ICAI ICADE CIHS

So, what is a data space?

'Interoperable framework, based on common governance principles, standards, practices and enabling services, that enables trusted data transactions between participants.'

Data Space Support Center, Blueprint 3.0

Glossary – Key Concepts Definitions

'(...) a common European data space brings together relevant data infrastructures and governance frameworks in order to facilitate data pooling and sharing'

European Commission,

2nd staff working document on data spaces, 2022



How does the law define data spaces?

'(...) common rules, standards and infrastructures and a governance framework, with a view to facilitating access to electronic health data for the purposes of primary use of electronic health data and secondary use of those data'

REGULATION (EU) 2025/327 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 11 February 2025 on the European Health Data Space and amending Directive 2011/24/EU and Regulation (EU) 2024/2847

'Such [financial data sharing] schemes should develop data and interface standards, set the coordination mechanisms for the operation of financial data access permission dashboards as well as a joint standardised contractual framework governing access to specific datasets, the rules on governance of these schemes, transparency requirements, compensation rules, liability, and dispute resolution.'

Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on a framework for Financial Data Access and amending Regulations (EU) No 1093/2010, (EU) No 1094/2010, (EU) No 1095/2010 and (EU) 2022/2554



From healthcare to finance and beyond: current and planned data spaces



Can we trust our overlords? Or... are standards democratic?

ANNEX I

List of new European standards and European standardisation deliverables to be drafted as referred to in Article 1

Table 1: List of new European standards and European standardisation deliverables to be drafted and deadlines for their adoption

	Reference information	Deadline for the adoption by the ESOs
1.	Harmonised standards on Trusted Data Transactions Part 1: Terminology, concepts and mechanisms	1 June 2026
2.	Harmonised standards on Trusted Data Transactions Part 2: Trustworthiness requirements	1 November 2026
3.	Harmonised standards on Trusted Data Transactions Part 3: Interoperability requirements	1 May 2027
4.	Technical specification(s) on a data catalogue implementation framework	1 March 2026
5.	Technical specification(s) on an implementation framework for semantic assets	1 September 2026
6.	European standard on a quality framework for internal data governance	1 March 2027
7.	Technical specification(s) on a maturity model for Common European Data Spaces	1 September 2026

Source: European Commission, COMMISSION IMPLEMENTING DECISION on a standardisation request to the European standardisation organisations as regards a European Trusted Data Framework in support of Regulation (EU) 2023/2854 of the European Parliament and of the Council, C(2025)4135





COMILLAS
UNIVERSIDAD PONTIFICIA

ICAI

ICADE

CIHS

The rocky road to a user-centred data economy

[comillas.edu](https://www.comillas.edu)



Consent: a knight in bright shining armour or an unnecessary pain?

Towards a technologically assisted consent in the upcoming new EU data laws?

Andrés Chomczyk Penedo

The European Commission (Commission) put forward an ambitious proposal package of new legislation for the digital economy, including the Digital Markets Act, the Digital Services Act, or the Data Governance Act. Despite their different scopes, they all share a recurring topic: the relevance of (personal) data in enabling a data-intensive economic model around data sharing and the role of data subjects in granting permission to do so. As such, the purpose of this article is to explore how the Commission and other EU institutions intended to strengthen consent in these novel data regulations through technological tools but also novel assistance duties, but also the potential shortcoming around this approach.

Source: Chomczyk Penedo, A. (2022). Towards a technologically assisted consent in the upcoming new EU data laws? *Privacy in Germany*, 5(22), 180-187. <https://doi.org/10.37307/j.2196-9817.2022.05.05>



The 'contractualization' of EU data law (I)

'(...) this Regulation adapts rules of contract law and prevents the exploitation of contractual imbalances that hinder fair access to and use of data.'

Recital 5, Data Act

'Unless otherwise provided for in this Regulation, it does not affect national contract law, including rules on the formation, validity or effect of contracts, or the consequences of the termination of a contract.'

Recital 9, Data Act



The 'contractualization' of EU data law (II)

'In order to enable the contractual and technical interaction necessary for implementing data access between multiple financial institutions, data holders and data users should be required to be part of financial data sharing schemes.'

Recital 25, FiDA proposal

'Without hindering or replacing contractual arrangements or other mechanisms in place, this Regulation is aimed at establishing a common mechanism to access electronic health data for secondary use across the Union.'

Recital 52, EHDSR





COMILLAS
UNIVERSIDAD PONTIFICIA

ICAI

ICADE

CIHS

Accommodating Solid in the data spaces paradigm

comillas.edu



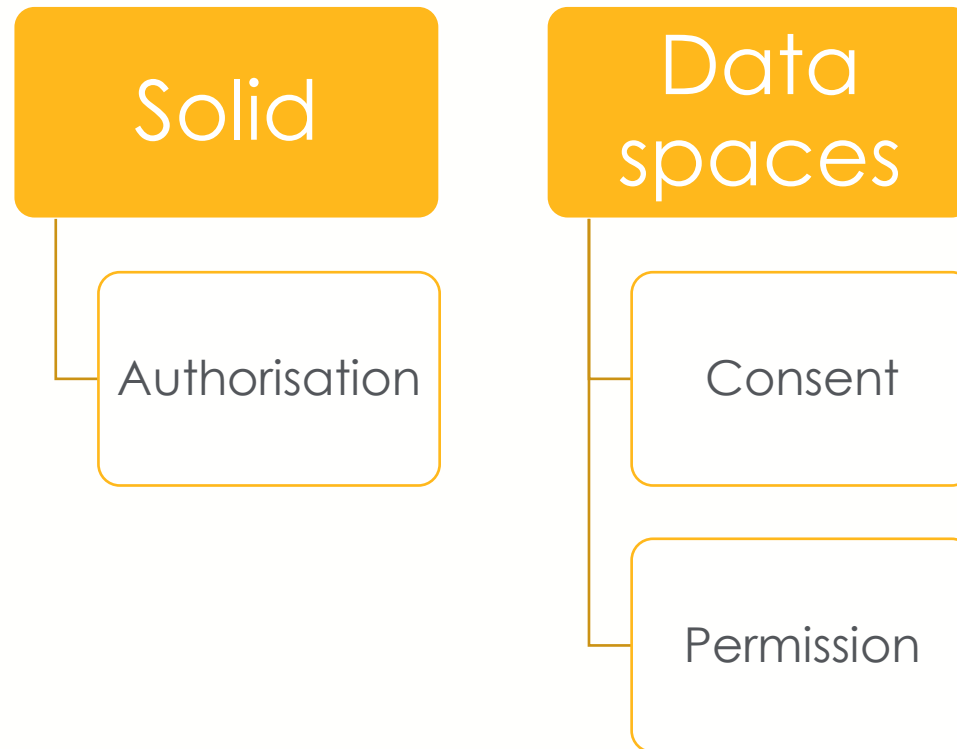
Solid and data spaces: an uneasy fit?

- Both Solid and data spaces are intended to decentralise and distribute control over data
- However, previous research has shown the difficulties between accommodating (EU) legal frameworks and implementing Solid; see, for example, Pandit (2023) or Fierens et al (2025)

Assessing Solid's viability as a sign of data spaces maturity

- While limited, some guidance on how to 'measure' the success of data space has been put forward
- One of the key elements to consider is intervenability, which would enable data free flow (reusability) while also procuring data subjects' intervention (contestability)

The quest for reconciliation: unifying terminologies





COMILLAS

UNIVERSIDAD PONTIFICIA

ICAI

ICADE

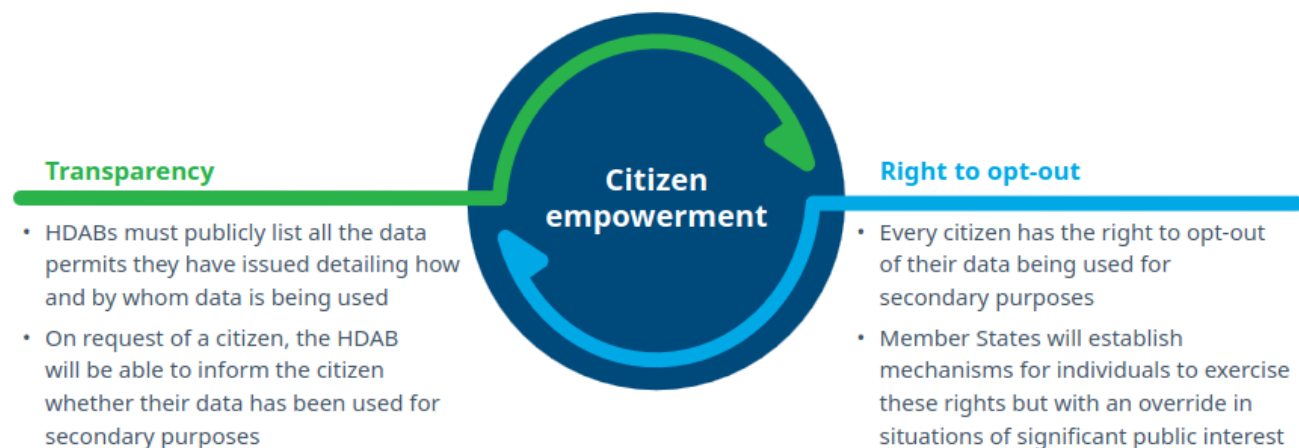
CIHS

Users' empowerment with Solid: from false promises to concrete affordances

comillas.edu



One piece of data a day keeps the doctor away?

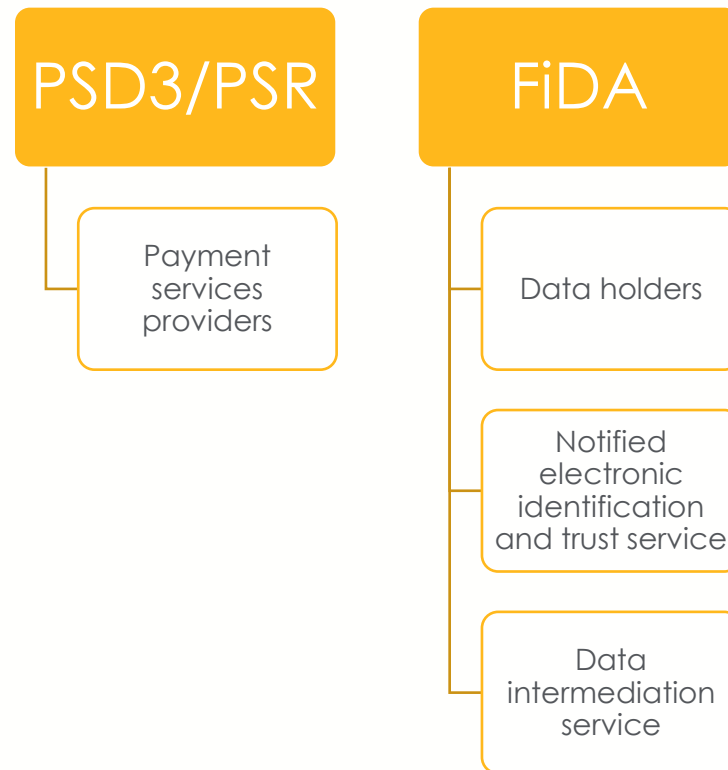


Source: Hines, P., Lounsbury, O., Massacesi, E. S., Gong, J., Chan, L., van Ballegooijen, H., Garrard, G., & van Bronckhorst, C. (2025). European Health Data Space (EHDS): A comprehensive guide to data reuse [White paper]. IQVIA. <https://www.iqvia.com/-/media/iqvia/pdfs/library/white-papers/2025/iqvia-european-health-data-space-ehds-a-comprehensive-guide-to-data-reuse.pdf>

Money is not the answer to all problems... but it helps

- Main premise behind the European Financial Data Space: the role of users with regards to their data
- Learning from past mistakes: right thoughts, right words, right actions
- Of dashboards and FISPs: exploring options in the EFDS

Understanding the legal framework for dashboards



The permission dashboard as venue for Solid deployment

A permission dashboard shall:

(a) provide the customer with an overview of each ongoing permission given to data users, including:

(i) the name of the data user to which access has been granted

(ii) the customer account, financial product or financial service to which access has been granted;

(iii) the purpose of the permission;


(iv) the categories of data being shared;

(v) the period of validity of the permission;

(b) allow the customer to withdraw a permission given to a data user;

(c) allow the customer to re-establish any permission withdrawn;

(d) include a record of permissions that have been withdrawn or have expired for a duration of two years.



Permission Dashboard
Welcome, (Customer Name)
Here you can monitor and manage the permissions you have provided to data users.

Active Permissions

Data User Name	Account / Product Service	Purpose	Data Categories	Actions
FinTech App A	Current Account 1234	Budgeting app integration	Account balance, contact info	Withdraw Permission
InsurTech B	Home Insurance Policy 5678	Claims automation	Claims history, contact info	Withdraw Permission
Credit Checker C	Credit Card 4321	Credit worthiness check	Payment history, credit limits	Withdraw Permission

Withdrawn / Expired Permissions (last 2 years)

Data User Name	Account / Product Service	Permission Status	Actions
Investment App D	Investment Account 9976	Portfolio analysis, investment positions, transactions	Re-establish Permission
Travel Insurer E	Travel Insurance Policy 2468	Policy details, claims	Re-establish Permission

www.insurtech4good.com

Does anybody oppose this marriage?



EUROPEAN COMMISSION

Brussels,
19.11.2025

COM(2025)
837 final

2025/0360(COD)

Proposal for a

REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL

amending Regulations (EU) 2016/679, (EU) 2018/1724, (EU) 2018/1725, (EU) 2023/2854 and Directives 2002/58/EC, (EU) 2022/2555 and (EU) 2022/2557 as regards the simplification of the digital legislative framework, and repealing Regulations (EU) 2018/1807, (EU) 2019/1150, (EU) 2022/868, and Directive (EU) 2019/1024 (Digital Omnibus)



Reconciling Solid with the EU data spaces paradigm: a revolution of the status quo or business as usual?

achomczyk@comillas.edu

andres.chomczyk.penedo@vub.be