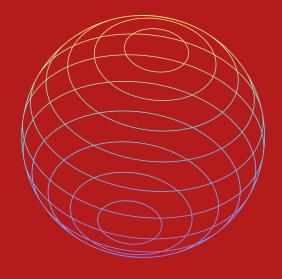
REPORT

Good In Tech

Rethinking innovation and technology as drivers of a better world for and by humans

In partnership with COP digital



Regulations related to
Corporate Digital
Responsibility:
International, national
and local scales

Clothilde Legros under the coordination of Christine Balagué





REGULATIONS RELATED TO CORPORATE DIGITAL RESPONSIBILITY INTERNATIONAL, EUROPEAN, NATIONAL AND LOCAL SCALES

<u>Introduction to the mapping methodology</u>

This report aims to constitute a mapping of Corporate digital responsibility related regulations at international, European and national scales so as to list existing norms and gaps needing to be filled.

Defining CDR

As there is no legal definition of CDR, it was necessary to rely on the most admitted definitions in the academic community to realize this mapping. Two definitions were chosen:

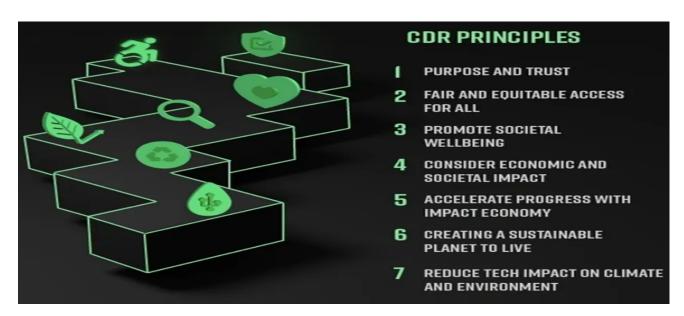
The first one is **Herden's definition which defines CDR as** "an extension of a firm's responsibilities which takes into account the ethical opportunities and challenges of digitalization." (Herden, 2021).

The second one is Lobschat's definition which states that "CDR is a set of shared values and norms guiding an organization's operations with respect to the creation and operation of digital technology and data." (Lobschat, 2021).

• Outlining CDR related regulations

In addition to defining CDR, there was a need to determine areas of Corporate Digital Responsibility so as to map relevant norms and legal texts. However, the different studies and researches around CDR distinguish different pillars and areas that can vary from one author to another. For example, Herden recommends to apprehend CDR through the ESG (Environmental, social, Governance) framework while the CDR

manifesto¹ lists 7 CDR 7 CDR principles (Purpose and trust, societal wellbeing, economic and social impact ...).



CDR Manifesto website

To be as broad as possible and encompass all of these areas, three CDR pillars were delimited for this mapping:

- 1) Sustainability and environmental impact.
- 2) Privacy and security
- 3) Social impact and inclusivity.

All the legal texts presented in this document will be related to one of these areas.

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¹ The CDR manifesto is an international group of academics corportate practitioners and published authors who collaborated to build a reflexion and a set of CDR principled

I. <u>International Legal texts</u>

Environmental impact of digital • International climate agreements are broader than digital in particular • Reports published by the united nations environment programme on the challenges of managing electronic waste. Privacy • International Covenant on Civil and Political Rights (1976), art 17 'No one shall be subjected to arbitrary or unlawful interference with his privacy (...).' • Guidelines for the regulation of computerized files containing personal data (UN General Assembly Resolution 45/95 (1990). • OECD Recommendations on Guidelines Governing the Protection of Privacy and Transborder Flows of Personal Data (1980) • Web Content Accessibility Guidelines (WCAG) 2.1, published by the World Wide Web Consortium (W3C) in 2018

1) Environmental impact of digital

a. Worldwide scale

There are few specific standards for corporate digital responsibility at international level. International agreements such as the COPs are broader than digital related issues. However, a number of reports on digital have been published by NGOs and international groups. For example, the **United Nations Environment Programme** has published a report on digital pollution². Similarly, the **Electronic Frontier Foundation** publishes reports on the impact of digital technology³.

b. European Scale

European legislation, mainly from the council of europe, has a wider scope than the impact of digital technology.

The European Court of Human Rights (ECHR) recognises the right to a healthy environment under Article 8 of the European Convention on Human Rights. Article 8 guarantees the right to respect for private and family life, and the Court has interpreted this right to include the right to a healthy environment. As a result, individuals have the right to live in an environment that does not adversely affect their health or quality of life.

3

²https://www.unep.org/news-and-stories/press-release/un-report-time-seize-opportunity-tac kle-challenge-e-waste

³ https://www.eff.org/fr

2) Privacy

a. Worldwide scale

Personal data and privacy protection is the most standardized pillar of CDR internationally. At international level, it is in particular the International Covenant on Civil and Political Rights (1976) that is used in international litigations. Furthermore, certain guidelines and reports, despite their non-binding nature, fuel the international culture of privacy protection.

- International Covenant on Civil and Political Rights (1976), art 17 'No one shall be subjected to arbitrary or unlawful interference with his privacy (...).'
- Guidelines for the regulation of computerized files containing personal data (UN General Assembly Resolution 45/95 (1990).
- OECD Recommendations on Guidelines Governing the Protection of Privacy and Transborder Flows of Personal Data (1980): Sets out fundamental principles on data collection, security and accountability.

b. European Scale

The binding and significant texts at European level come from the council of Europe and its main instrument, the European Convention on Human rights of 1950. Many decisions of the European Court of Human Rights in disputes between European states and their nationals rely on these texts.

- Art. 8 ECHR (1950): 'Everyone has the right to respect for his private and family life, his home and his correspondence.'
- **Council of Europe Resolution 428**, Declaration on the Mass Media and Human Rights (1970), art. 19: Obligation to collect strictly necessary data.
- The Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data, known as **Convention 108**, **of the Council of Europe (1985)**: Aims to regulate cross-border data flows and prohibits the processing of "sensitive" data.

3) Accessibility and inclusivity

There are few binding standards relating to the inclusiveness and social impact of digital on an international scale. However, **Web Content Accessibility Guidelines (WCAG) 2.1, published by the World Wide Web Consortium (W3C)** in 2018 are of interest in the context of this mapping exercise insofar as they set out very precise levels of accessibility for digital products.

WCAG aim to improve web accessibility for a wider range of individuals, including those with cognitive and learning disabilities, low vision, and mobile device users. The guidelines introduce three levels of conformance to digital products (A; AA; AAA) according to many criterias (low vision, adaptive content, content orientation...).

This rating system evaluates several elements such as the digital product ability to provide equivalent textual content for non-textual elements, to provide options for customizing the presentation of content, such as text size, to make accessible and understandable forms and documents. Level AA is the most commonly used and recommended for most public websites, as it provides a good balance between accessibility and feasibility.

II. European Union legislative initiatives

The vast majority of texts dealing with CDR come from the European Union Many directives and regulations have been superseded and repealed. For the sake of clarity, only the most relevant pieces of legislation for understanding the current CDR related regulatory ecosystem will be mentioned here.

1. Environmental impact of digital

To be as clear as possible this European regulations listing, sub-categories have been determined in each of the pillars determined as part of this mapping. For the environmental pillar three sub-sections have been determined:

- Energy efficiency
- Digital waste
- Non financial reporting obligations

Environmental impact of digital

<u>Energy</u> <u>efficiency</u>

- Directive 2009/125/EC establishing a framework for the setting of ecodesign requirements for energy-related products.
- Directive 2010/30/EU on the indication by labelling and standard product information of the consumption of energy and other resources by energy-related products.
- Regulation (EC) No 106/2008 implementing Directive 2009/125 on a Community energy-efficiency labeling programme for office
 equipment.
- Commission Regulation implementing Directive 2009/125/EC with regard to ecodesign requirements for computers and computer servers.

Digital waste

• Waste from Electrical and Electronic Equipment (WEEE) directive 2012/19 EU

Non financial reporting

• Corporate Sustainability directive (EU) 2022/2464 I

a. Energy Efficiency

(i) Two main Directives

Within the European Union, two main directives have had a normative effect on the energy efficiency of electrical and electrical products:

• Directive 2009/125/EC establishing a framework for the setting of ecodesign requirements for energy-related products.

This directive introduces minimum energy performance standards and encourages manufacturers to review their design methods to ensure they are as efficient as possible. It establishes binding energy efficiency targets for EU member states and requires them to implement a variety of measures to improve energy efficiency, including promoting energy audits, increasing efficiency in energy production and distribution.

• Directive 2010/30/EU on the indication by labeling and standard product information of the consumption of energy and other resources by energy-related products.

The directive mandates that products covered by it must be equipped with a standardized energy label. This label should provide information about the product's energy consumption, its energy efficiency, and other relevant characteristics. It classifies products according to their energy efficiency from A (Very efficient) to G (inefficient).

This classification enables consumers to easily compare the energy performance of products. The 2010 directive also requires the establishment of a European database for energy-related products, allowing consumers to access up-to-date information on the product's energy performance.

Both of these directives are applied to electronic equipment (computers, servers, decoders...).

This legislative framework should evolve shortly, a new **Regulation proposal on the ecodesign of sustainable products (COM(2022) 142)** being currently under negotiation. It should be adopted by the end of 2023.

This Regulation would replace the existing Directive (2009/125) by significantly expanding its scope, both as regards the types of products concerned and as regards eco design criteria. It would also aim to establish a digital product passport and better regulate the destruction practices of unsold new products.

(ii) Regulations specifically applied to digital

In order to be more practical and concretely address electronic devices energy efficiency, several specific implementing regulations, based on the two previous directives, have been adopted in the digital sector.

- Regulation (EC) No 106/2008 on a Community energy-efficiency labeling programme for office equipment: Promotes energy efficiency by obliging manufacturers to provide consumers information on computer energy consumption, standby performance, noise levels, etc.
- Commission Regulation (EU) No 617/2013 of the European Parliament and of the Council with regard to ecodesign requirements for computers and computer servers.
- Commission Regulation (EU) 2019/ laying down ecodesign requirements for electronic displays pursuant to Directive 2009/125/EC.

b. Digital waste

The European Union has taken measures in the field of digital waste which directly address the digital sector.

In 2012, the EU passed a directive on the treatment of digital waste, **the Waste from Electrical and Electronic equipment (WEEE) Directive 2012/19 EU.** This Directive is based on the finding that the amount of waste electrical and electronic equipment is one of the fastest growing waste streams. This text aims to contribute to sustainable production and consumption by promoting the efficient use of resources through re-use, recycling and other forms of recovery.

To this end, the WEEE directive sets up certain rules for the treatment of digital waste:

- **Article 5 of the directive** addresses separated collection of electronic and electrical devices by establishing that distributors must ensure the collection of electronic devices so that final holders can return such waste free of charge.
- Article 8 stipulates that producers and third party dealers are responsible for implementing the best collection techniques and article 12 adds that producers must finance this electronic waste recovery system in proportion to their market share.
- Article 7 of the directive sets collection rate goals: It sets a goal of a minimum collection rate of 45% by 2016. This rate is calculated on the basis of the average weight of WEEE collected within the past three years. From 2019, this rate was supposed to reach 65%. This goal was postponed to 2021 in some countries (Romania, Hungary) due to their lack of infrastructure.

It should be noted that these rates have not been reached in most European countries. For instance, in France, the collection rate of WEEE was around 47.5%.⁴

c. Non Financial reporting obligations

The last category of CDR related texts in the environmental sector are the nonfinancial reporting obligations. These kinds of obligations were introduced in 2014 with the Non Financial information Reporting Directive 2014/95/EU of the European Parliament and of the Council of 22 October 2014.

This text aims to raise the transparency of the social and environmental information provided by companies. It requires companies to publish reports on the policies they implement in relation to social responsibility and treatment of employees; respect for human rights; anti-corruption and bribery; and diversity on company boards. The directive requires companies to disclose information about their business models, policies (including implemented due diligence processes), outcomes, risks and risk management, and key performance indicators (KPIs) relevant to the business

⁴ https://www.eca.europa.eu/lists/ecadocuments/rw21_04/rw_electronic_waste_fr.pdf https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13420-Dechets-dequipement s-electriques-et-electroniques-evaluation-des-regles-de-IUE/feedback_fr?p_id=31533005

This directive was modernized in 2022 by the **Corporate Sustainability directive (EU) 2022/2464**.

This text adds new obligations and clarifies the 2014 text with regard to environmental issues in particular. This text adds new obligations and clarifies the 2014 text with regard to environmental issues in particular. It aims to improve the accuracy and reliability of the information previously collected by the NFRD, and to standardize it in a report published according to a European standard. The directive is also intended to ensure that investors and other stakeholders have access to financial risks and opportunities arising from climate change and other sustainability issues.

The CSRD will concern large companies (with more than 250 employees), listed SMEs and Non-European companies with an annual turnover of more than 150 million euros on the EU market. The first companies will have to apply the new rules for the first time in the 2024 financial year, for reports published in 2025.

Companies subject to the CSRD will have to report according to European Sustainability Reporting Standards (ESRS). The standards were developed by the EFRAG, previously known as the European Financial Reporting Advisory Group, an independent body bringing together various different stakeholders. The standards will be tailored to EU policies, while building on and contributing to international standardization initiatives.

Digital being at the same time a tool helping resources optimisation and on the other hand a source of energy consumption à digital is at the heart of companies' energy performance à digital sector directly targeted by this directive.

2. Privacy, data issues and security

The second pillar of CDR is perhaps the most comprehensive and innovative approach taken by the European union. In the interests of relevance and sovereignty, Europe is endeavoring to get to grips with the issues surrounding personal data and security.

Within this CDR pillar, three subsections have been delimited:

- Privacy
- Data governance
- (Cyber)security.

Privacy, Data and Security



- Charter of fundamental rights of the European Union (Art 8).
- General Data Protection Regulation (2016)

DATA

• European Data act : Proposal for a Regulation on harmonised rules on fair access and use of data à Adopted by the Commission 23rd february 2022.

SECURITY

- Networking Equipment Directive (2019/771/EU).
- Directive on measures for a high common level of cybersecurity across the Union (NIS2 Directive)

a. Privacy

One of the funding normative texts in terms of privacy is **article 8 of the Charter of fundamental rights of the European Union** which states that "Everyone has the right to the protection of their personal data." they must be treated "fairly, for a specified purpose and on the basis of the consent of the person concerned or under another lawful basis provided for by law." This text can be used in international disputes.

Furthermore, there has been a succession of directives and regulations on personal data, the most recent of which is **the Regulation 2016/679**: **General Data Protection Regulation (GDPR) of 2016**.

This regulation has been applied to all member states since 2018. It aims to protect people's privacy by imposing strict rules on how organizations collect, process, store, and transfer personal data, and it grants individuals greater control over their own data.

- Articles 6 and 7 of the regulation establish that organizations must obtain clear and explicit consent from individuals before processing their personal data.
- Articles 12-13 grant individuals several rights, including the right to access, rectify, erase, and port their data.
- The regulation Chapter V deals with cross-border Data transfers and stipulates that transfers are only allowed toward countries which have a similar level of protection.

• If a company fails to comply with the RGPD standards, Article 83 of the regulation sets out penalties which can go up to 4% of the global annual company turnover.

b. Data Governance

Through its regulations, Europe is seeking greater sovereignty over its citizens' data. It is also seeking to give them greater powers and visibility over the processing of their own data by digital services. The EU has a data Governance strategy of which the brand new European Data Act and Data Governance act are the first texts.

(i) Data Governance Act

The Data Governance Act was adopted in May 2022 and came into force in September 2023. It aims to make more data available and facilitate data sharing across sectors and EU countries in order to leverage the potential of data for the benefit of European citizens and businesses.

- Mechanisms to facilitate the reuse of certain public sector data that cannot be made available as open data. For example, the reuse of health data could advance research to find cures for rare or chronic diseases.
- Measures to ensure that data intermediaries will function as trustworthy organizers of data sharing or pooling within the common European data spaces.
- Measures to make it easier for citizens and businesses to make their data available for the benefit of society.
- Measures to facilitate data sharing, in particular to make it possible for data to be used across sectors and borders, and to enable the right data to be found for the right purpose.

(ii) European Data Act

European Data act is a Proposal for a Regulation on harmonized rules on fair access and use of data (Adopted by the Commission 23rd february 2022). Its main goal is to ensure a **better distribution of the value derived from the use of personal and non-personal data between the players in the data economy, particularly in relation to the use of connected objects and the development of the Internet of Things.**

- It aims to increase digital services interoperability by allowing a better distribution of the value resulting from the use of personal and non-personal data between actors in the data economy.
- This text also aims to facilitate the sharing of data between companies (B2B) and with the consumer (B2C). It thus sets an obligation to make accessible the data generated by the use of connected objects and related services, in return for fair and equitable compensation.
- It also facilitates the change of data processing service provider (cloud and edge computing) by framing contractual relationships between service providers and consumers (by phasing out the costs of change for the consumer).
- Finally, the European Data act puts in place safeguards against unlawful access by third country governments to non-personal data contained in the cloud.

c. Cybersecurity

Europe is tending to stay abreast of security issues linked to digital technology, which require rapid legislative adaptation.

• In this context, in 2016, the European Union's NIS Directive (Network and Information Systems Directive) was adopted and came into force in 2018. This directive aims to strengthen the cybersecurity of critical infrastructures in Europe.

It defines sectors considered to be critical infrastructures (including energy, transport, health, banking and financial services, water and digital services, among others) and sets obligations for Essential Service Operators (ESOs) who are required to put in place appropriate security measures to protect their networks and information systems against cyber threats.

In addition, under the terms of this Directive, providers of digital services, such as cloud computing services, online marketplaces and search engines, are also subject to certain cybersecurity obligations.

The directive encourages cooperation and coordination between EU Member States to combat cross-border threats and ensure an effective response to cybersecurity incidents.

• The NIS directive has recently been modernized by the NIS 2 which came into force in 2023.

NIS 2 modernizes the existing legal framework to keep up with increased digitisation and an evolving cybersecurity threat landscape. By expanding the scope of the cybersecurity rules to new sectors and entities, it further improves the resilience and incident response capacities of public and private entities, competent authorities and the EU as a whole.

3. Accessibility and Digital social impact



Europe is working to ensure that digital is equally accessible between Member States and individuals. The EU is also working to prevent the negative impacts of this diffusion of new technologies. Three sub-sections of this CDR pillar are :

- Accessibility
- Preventing Harmful or illegal content
- Preventing the risks of artificial intelligence
- a. Accessibility

One European goal is deployment of a high speed electronic communication network.

Directive 2014/61/EU on measures to reduce the cost of deploying high-speed electronic communications networks aims to create the terms for a more efficient

roll-out of new physical infrastructure so as to provide more people in the EU with access to ultrafast internet.

b. Preventing Harmful or illegal content

Europe has made new issues of online hatred and misinformation one of its main working topics. These issues are notably addressed with the **DSA**, a new European regulation of 19 October 2022

This regulation aims to put into practice the principle that what is illegal offline is illegal online. It sets a set of rules to empower digital platforms and fight against the dissemination of illegal or harmful content or illegal products: racist attacks, child pornography images, disinformation, sale of drugs or counterfeits.

DSA provides for many measures, graduated according to the online players, to the nature of their services and their size. Very large platforms and search engines are subject to stricter requirements.

Under this regulation, online platforms must offer Internet users a tool to easily report illegal content. Once reported, they must quickly remove or block access to illegal content.

Furthermore, in a transparency goal platforms must explain their algorithm and must collaborate with researchers, national authorities and communicate key elements of their algorithms so that the risks they generate can be analyzed and tackled.

Main of the obligations set out in this text are due to come into force on 17 February 2024. The very large online platforms and search engines were affected from 25 August 2023.

c. Preventing the risks of AI

The very recent issue of artificial intelligence has attracted the attention of Europe, which is adopting an avant-garde text in this area: the AI act. This text will be the first transnational text to legislate in a very normative way on AI. It mainly aims to avoid the negative impacts of AI on society (misinformation, arbitrary...).

The AI Act was adopted by the European Parliament in June 2023. It is still in negotiation between the member states. This text aims to introduce a common regulatory and legal framework for artificial intelligence. Its scope encompasses all sectors and to all types of artificial intelligence.

It classifies AI in 3 CATEGORIES according to their risk to cause harm:

- **Unacceptable risk:** Unacceptable risk AI systems are systems considered a threat to people and will be banned. They include:
 - Cognitive behavioural manipulation of people or specific vulnerable groups: for example voice-activated toys that encourage dangerous behaviour in children:
 - Social scoring: classifying people based on behaviour, socio-economic status or personal characteristics;
 - Real-time and remote biometric identification systems, such as facial recognition;
 - Some exceptions may be allowed: For instance, "post" remote biometric identification systems where identification occurs after a significant delay will be allowed to prosecute serious crimes but only after court approval.
- **High risk:** AI systems that negatively affect safety or fundamental rights will be considered high risk. **They will be assessed before being put on the market and also throughout their lifecycle**. They include:
 - AI systems that are used in products falling under the EU's product safety legislation. This includes toys, aviation, cars, medical devices and lifts.
 - AI systems falling into eight specific areas that will have to be registered in an EU database: Biometric identification and categorisation of natural person
 - Management and operation of critical infrastructure
 - Education and vocational training
 - Employment, worker management and access to self-employment
 - **Generative AI**: Generative AI, like ChatGPT, would have to comply with transparency requirements: Disclosing that the content was generated by AI Designing the model to prevent it from generating illegal content Publishing summaries of copyrighted data used for training.
 - **Limited risk:** Limited risk AI systems should comply with minimal transparency requirements that would allow users to make informed decisions.
 - After interacting with the applications, the user can then decide whether they want to continue using it. Users should be made aware when they are interacting with AI. This includes AI systems that generate or manipulate image, audio or video content, for example deepfakes.

III. National legal texts

National legal texts are either directly applied to European regulations or transposed directives. For the sake of exhaustivity, the names of the main transposed directives are

listed in this mapping. However, the main obligations relevant for this mapping come from European texts.

1. Environmental impact of digital

| EU Directive | <u>Irish law</u> | Spanish law | Hungaria n law | Romania n law | <u>Italian</u> <u>law</u> | French law | Finnish law |
|--|--|--|---|---|---|---|------------------------------------|
| Directive 2009/125/E C of the European Parliament and of the Council of 21 October 2009 establishing a framework for the setting of ecodesign requirement s for energy-relat ed products | European Communities (Energy Efficient Household Refrigerating Appliances) Regulations 2012, also known as S.I. No. 351 of 2012. | (Royal Decree 1075/2014 of December 19, 2014, establishing ecological design requirements applicable to energy-relate d products). | Governme nt Decree No. 349/2013 (XII.17.): This decree, issued by the Hungarian governme nt, establishe s the framewor k for the eco-design requireme nts applicable to energy-rel ated products. | Governme nt Decision No. 992/2015: This governme nt decision transposed Directive 2009/125/EC into Romanian law and establishe d the framework for eco-design requireme nts applicable to energy-rel ated products. | Legislati ve Decree No. 102/201 4: This legislativ e decree, also known as "Codice dell'ener gia" (Energy Code) | Decree no. 2011-764 of 28 June 2011 on the national market surveillance procedure for products with an impact on energy consumption - created Section 4: Products with an impact on energy consumption (R.224-61 et seq.). Order of 3 August 2011 on the procedures for assessing the conformity of products with an impact on | Energy Efficiency Act (395/2016). |

| | | | | | | energy consumptio n. | |
|---|--|--|---|--|---|--|---|
| Waste from Electrical and Electronic Equipment (WEEE). DIRECTIVE 2012/19/EU | "European Union (Waste Electrical and Electronic Equipment) Regulations 2014," also known as S.I. No. 149 of 2014. | Real Decreto 110/2015, de 20 de febrero, sobre residuos de aparatos eléctricos y electrónicos" (Royal Decree 110/2015 of February 20, 2015, on waste electrical and electronic equipment). | "Act XLII of 2016 on Waste" (Hulladékr ól szóló 2016. évi XLII. törvény). | "Governm ent Emergenc y Ordinance No. 5/2015 on Waste Electrical and Electronic Equipment " (Ordonanț a de Urgență a Guvernului nr. 5/2015 privind deșeurile de echipamen te electrice și electronice). | decree No. 49 of March 14, 2014, also known as "Codice dell'Amb iente" (Environ mental Code). | Decree 2014-928 of 19 August 2014 on waste electrical and electronic equipment and used electrical and electronic equipment. | Act on Producer Responsibi lity for Packaging and Waste Containers " (Laki tuottajavas tuusta pakkaus-ja pakkausjät teistä, No. 542/2021) . |
| 2019/770 Directive | | | | | | | |
| Networking Equipment Directive (2019/771/ EU): This directive imposes ecodesign and energy consumptio n | | | | | | | |

| requirement s for networking equipment, including network switches and routers. | | | | |
|---|--|--|--|--|
| Directive 2014/95/EU of the European Parliament and of the Council of 22 October 2014 | | | | |
| Corporate Sustainabilit y directive (EU) 2022/2464 | | | | |

2. Data privacy and security

| EU Directive | <u>Irish</u> <u>law</u> | | Spanish law | | Hunga n law | <u>ria</u> | Roma n law | | <u>Italian law</u> | | French | ı law | Finnish law | Ţ |
|--------------|----------------------------|------|----------------|-------|----------------|------------|---------------|------|--------------------|------|---------|--------|----------------|-------|
| Regulation | Data | | Orga | nic | Act CX | II of | Law | no. | Legislati | ive | "Law | No. | "Data | |
| no. 2016/679 | prote | ctio | Law | | 2011 | on | 190/2 | 2018 | Decree | no. | 2018-4 | 93 of | Protection | on |
| of the | n | Act | 3/20 | 18 | Informa | atio | on | | 101/203 | 18 | June | 20, | Act" | |
| General Data | 2018 | | on | the | nal | | meası | ıres | (D. | Lgs. | 2018, c | n the | (Henkilö | tiet |
| Protection | | | Prote | ectio | Self-Det | ter | for | the | 101/202 | 18): | Protect | ion of | olaki, | |
| Regulation | | | n | of | minatio | n | imple | ment | | | Persona | al | common | ly |
| | | | Perso | onal | and | | ation | of | | | Data." | | referred | to |
| | | | Data | and | Freedo | n of | the | | | | (French | data | as "HetiI | d" or |

| (GDPR) | the | Informatio | General | protection | "Data |
|---------|-------------|-------------|------------|------------|------------|
| (2016), | Guarante | n (Info Act | Data | act). | Protection |
| | e of | or Infotv): | Protection | | Act |
| | Digital | | Regulation | | 1050/2018" |
| | Rights | | : | |). |
| | (Ley | | | | |
| | Orgánica | | | | |
| | 3/2018, | | | | |
| | de 5 de | | | | |
| | diciembre | | | | |
| | , de | | | | |
| | Protecció | | | | |
| | n de | | | | |
| | Datos | | | | |
| | Personale | | | | |
| | s y | | | | |
| | garantía | | | | |
| | de los | | | | |
| | derechos | | | | |
| | digitales): | | | | |
| | | | | | |

3. Accessibility: tackling digital divide

| EU Directive | Irish law | Spanish law | Hungaria n law | Romania n law | <u>Italian law</u> | French law | <u>Finnish</u> <u>law</u> |
|--|--------------|----------------|-------------------|------------------|--------------------|------------|------------------------------|
| Directive 2014/61/EU on measures to reduce the cost of deploying high-speed electronic communicat ions networks. | | | | | | | |