

From: [REDACTED]
To: [datasharingcode](#)
Subject: Data Sharing Code consultation
Date: 02 September 2019 14:50:59

The Board of Mydex CIC has discussed your consultation.

The scope of the guidance is about organisation to organisation data sharing between controllers. While it is important that ICO oversees a code for such activities, the consultation ignores the fact that the landscape of data sharing is changing fundamentally with the introduction of GDPR provisions relating to data portability.

Under GDPR, there are two ways of implementing data portability. 1) where an individual asks an organisation to port their data to another organisation 2) where an individual asks an organisation for a copy of their data, keeps a copy of this data (for example, in a personal data store), and then shares it forward to another service provider when and if the individual chooses to do so.

It is urgent and vital that the ICO develops a Code that a) enables and ensures that data portability works easily, safely and efficiently, and b) addresses the overlaps and additional considerations that GDPR data portability provisions bring to current processes for sharing data between organisations.

We think this is an oversight in your consultation that urgently needs to be rectified.

(Mydex CIC has developed the infrastructure that enables the second, personal data store-based mode of data portability/sharing to operate efficiently, effectively, easily and safely. We have a huge amount of insight into issues relating to data sharing, but we do not feel that the way you have asked your questions provides us with a basis to provide these insights.)

Yours sincerely

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Mydex

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