



Bundesnetzagentur

DIGITAL SERVICES
COORDINATOR



Getting ready for the EU's DSA Data Access Portal

Practical notes and questions

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DSA40 Data Access Days
September 25, 2025

The next ~20 minutes

1 Before the application: Ongoing preparatory work

2

Application via the
DSA Data Access Portal

3

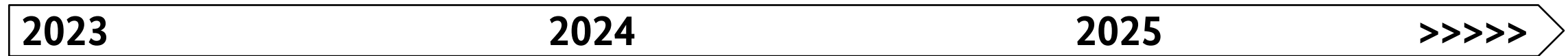
After the application and outlook

From the DSA to the Data Access Portal

Researcher collaboration, networking

Proposals for data access (infrastructure)

Researchers work on/with Article 40(12) DSA



Commission develops,
consults on Delegated Act

Commission prepares Data
Access Portal

DSCs and Board coordinate, prepare
structures/processes

Some limitations for new opportunities

Only after **vetting** by DSC

Only research on **VLOPs**

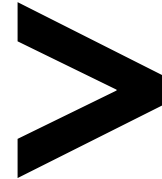
Only research on **systemic risks** in the EU

Some limitations for new opportunities

Only after **vetting** by DSC

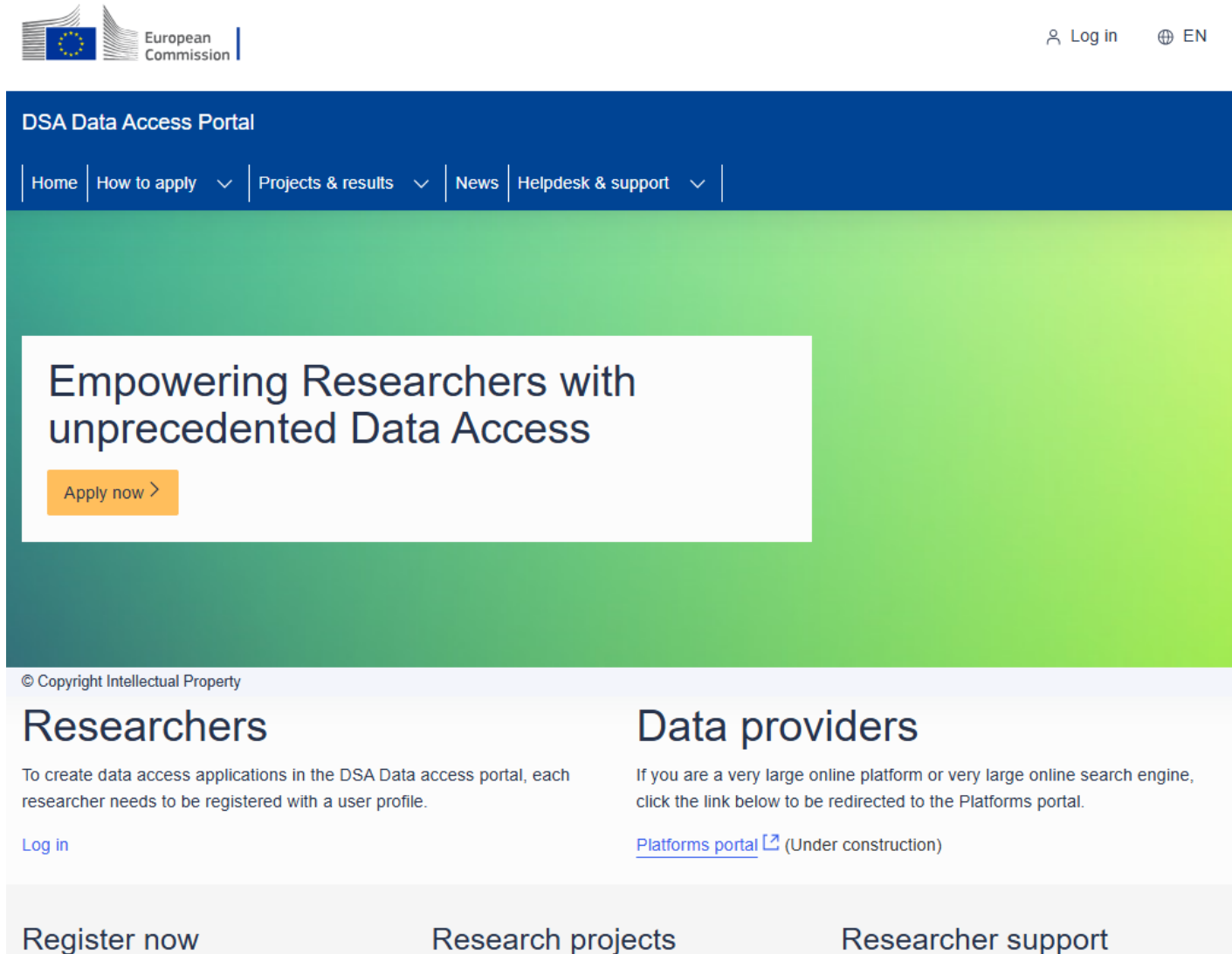
Only research on **VLOPs**

Only research on **systemic risks** in the EU



Voluntary, ad hoc
agreements based on
personal connections
for individual topics

data-access.dsa.ec.europa.eu



The screenshot shows the homepage of the DSA Data Access Portal. At the top, there is a header with the European Commission logo on the left and 'Log in' and 'EN' links on the right. Below the header is a dark blue navigation bar with the title 'DSA Data Access Portal' and a menu with links: 'Home', 'How to apply', 'Projects & results', 'News', and 'Helpdesk & support'. The main content area has a green-to-yellow gradient background. A white box on the left contains the text 'Empowering Researchers with unprecedented Data Access' and an orange 'Apply now >' button. Below this, there is a footer section with two columns: 'Researchers' and 'Data providers'. The 'Researchers' column includes a description of the registration process and a 'Log in' link. The 'Data providers' column includes a description of the platform portal and a link to the 'Platforms portal' (under construction). At the bottom, there is a light gray bar with three links: 'Register now', 'Research projects', and 'Researcher support'.

European Commission

Log in EN

DSA Data Access Portal

Home | How to apply | Projects & results | News | Helpdesk & support

Empowering Researchers with unprecedented Data Access

Apply now >

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Researchers

To create data access applications in the DSA Data access portal, each researcher needs to be registered with a user profile.

[Log in](#)

Data providers

If you are a very large online platform or very large online search engine, click the link below to be redirected to the Platforms portal.

[Platforms portal](#) (Under construction)

Register now Research projects Researcher support

Disclaimer

No legal advice!
Subject to change!

Parts of the application

Page 1/5
“Researcher
information”

Researchers, affiliation, independence

40(8)a, b

8(a) DA

Funding

40(8)c

8(b) DA

Research topic: VLOP, systemic risk

40(8)d, f

8(c), (f)
DA

Necessity and proportionality

40(8)e

8(d) DA

Data protection

40(8)d

8(e) DA

Data security, confidentiality

40(8)d

8(e) DA

Publication

40(8)g

Page 2/5
“Project-
specific
information”

Parts of the application

Page 3/5
“Summary”

Summary 8(g) DA

Page 4/5
“DSC”

Choice of DSC 40(8),
(9)

Page 5/5
“Review”

Review

Researchers, affiliation, independence

Researcher information - Personal details & academic affiliation

Principal researcher

Applicant name
Julian Jaursch

Institutional email address
N/A

Researcher organisation

☒ Existing organisation

Organisation name
Select organisation...

Organisation type
-

Affiliation type *

Every researcher in the team needs an EU Login account

Documentary evidence of the existence of a formal relationship between the applicant researcher and the research organisation of affiliation, e.g. employment contracts, proof of legal association *

Choose file Drag and drop file here

Confirmation of independence from commercial interests *

☐ I confirm

Additional information on independence from commercial interests e.g. commitment letter by the research organisation of affiliation

Choose file Drag and drop file here

Mandatory upload on affiliation, optional upload on independence (multiple files possible)

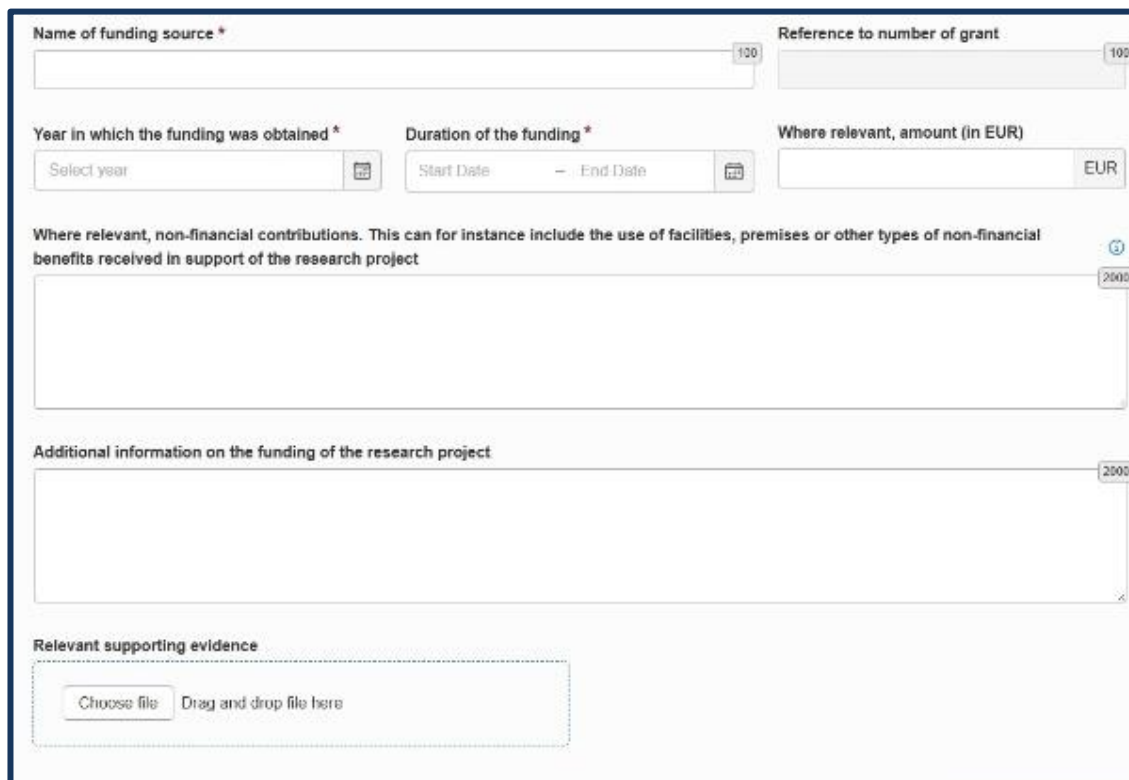


On research organization:

Evidence that research is primary goal, no commercial interests, no conflicts of interests

Potential examples: Work contracts, financial commitments, statutes, laws, membership proof, explanations of contractual relations with commercial entities

Funding



The form is titled "Funding" and contains several sections for data entry:

- Name of funding source ***: A text input field with a character count of 100.
- Reference to number of grant**: A text input field with a character count of 100.
- Year in which the funding was obtained ***: A dropdown menu with a calendar icon, labeled "Select year".
- Duration of the funding ***: A date range selector with "Start Date" and "End Date" fields and a calendar icon.
- Where relevant, amount (in EUR)**: A text input field with a "EUR" currency selector.
- Where relevant, non-financial contributions**: A large text area with a character count of 2000. The text reads: "Where relevant, non-financial contributions. This can for instance include the use of facilities, premises or other types of non-financial benefits received in support of the research project".
- Additional information on the funding of the research project**: A large text area with a character count of 2000.
- Relevant supporting evidence**: A section with a "Choose file" button and a "Drag and drop file here" instruction.



Documentation of source, amount, duration of funding

Potential examples: Financial/funding commitments, signed letters

Funding

The screenshot shows a web form for documenting funding. It includes fields for 'Name of funding source', 'Reference to number of grant', 'Year in which the funding was obtained', 'Duration of the funding', and 'Where relevant, amount (in EUR)'. There is also a section for 'Where relevant, non-financial contributions' and a large text area for 'Additional information on the funding of the research project'. At the bottom, there is a 'Relevant supporting evidence' section with a 'Choose file' button and a 'Drag and drop file here' area. A blue callout box with a pointer to the 'Additional information' field contains the text: 'Optional supporting evidence possible – non-financial contributions? gaps in funding?'.

Optional supporting evidence possible – non-financial contributions? gaps in funding?



Documentation of source, amount, duration of funding

Potential examples: Financial/funding commitments, signed letters

Research topic: VLOP, systemic risk

Very Large Online Platform / Very Large Online Search Engine from which data is requested *

Where relevant, other service(s) studied & relevant research project ID/name in the DSA Access Portal ⓘ

Research topic *

One VLOP per
application

Estimation of the required duration for which access to data is needed to carry out the research project. This estimation must be consistent with the described research activities and planned methodology. *

Start Date — End Date ⓘ

Explain how the expected results of that research will contribute to the detection, understanding of systemic risks in the Union, as set out pursuant to Article 34(1), and to the assessment of the adequacy, efficiency of the risk mitigation measures pursuant to Article 35 DSA *

System risk(s) & mitigation measures (pursuant Article 34(1) and 35 DSA) to which the research project is related *

Information on the type and format of the requested data

A description of the data requested, including format, source and, where possible, the specific attributes, relevant metadata and data documentation

Data access for a
specific, limited time

VLOPs' data catalogs
can be used



Description of VLOP and systemic risk(s)/risk mitigation studied + data requested

Necessity and proportionality

Information on the necessity and proportionality of the access to the data and the information on the time frames of the research for which the data are requested

2000

Key questions: "Options for less privacy-invasive research? Why not? Alternative sources? Less data?"

Documentation demonstrating that the applicant(s) have access to the proposed means to meet the requirements of confidentiality, data security and protection of personal data, e.g. in the form of a commitment letter by the research organisation(s) of the applicant(s)

Choose file Drag and drop file here

One (mandatory) upload opportunity for necessity/proportionality, data security, confidentiality, data protection



Proof of considering rights/legitimate interests of users and companies

Potential examples: Data management plan, data protection impact assessment

Data protection

Germany: DSC
coordinating with data
protection authorities

The screenshot shows a web form for data protection. It includes a question about personal data, a field for processing grounds, a section for documentation, and a file upload area. Callouts provide context for these elements.

Does the data requested include personal data?
☐ Yes ☒ No

If yes, please specify the processing grounds pursuant to GDPR ⓘ

Documentation demonstrating that the applicant(s) have access to the proposed means to meet the requirements of confidentiality, data security and protection of personal data, e.g. in the form of a commitment letter by the research organisation(s) of the applicant(s)

Choose a file and drop file here

Processing grounds: GDPR-compliant use of personal data
(legal basis for the application itself is Article 40 DSA)

Explain pseudonymization/anonymization

One (mandatory) upload opportunity for necessity/proportionality, data security, confidentiality, data protection



Proof of (further) GDPR compliance regarding the entire cycle of data use

Potential examples: Data management plan, data protection impact assessment, explanations regarding data retention/data deletion/international data transfers, certificates on data protection knowledge

Data security, confidentiality

A description of the technical, legal and organisational measures that will be put in place, including, where possible, suggested access modalities, to mitigate such risks when processing the requested data

Documentation demonstrating that the applicant(s) have access to the proposed means to meet the requirements of confidentiality, data security and protection of personal data, e.g. in the form of a commitment letter by the research organisation(s) of the applicant(s)

Choose file Drag and drop file here

Necessary, even if no personal data is being used

One (mandatory) upload opportunity for necessity/proportionality, data security, confidentiality, data protection

Considerations of trade secrets, (physical) data security

Potential examples: Policies on information security, activity logging/access restrictions, encryption, data deletion and/or against hacking; explanations of physical infrastructure; ISO standards

Publication

Commitment of the Principal Researcher to make the results of the research publicly available free of charge, within a reasonable period after the completion of the research, subject to the rights and interests of the recipients of the service concerned, in accordance with Regulation (EU) 2016/679 *

☐ I commit

Estimated date (DD/MM/YYYY) for publication of the research results *

Select a date

Additional, optional uploads possible on pages 2 or 5

Additional document 1

Choose file

Name of the document *

100



Commitment to publication of research results free of charge

Potential examples: Publication timeline/funding

DSC choice







Digital Service Coordinator where to submit the Data access application ⓘ

ⓘ Please choose your research organisation before proceeding to Digital Services Coordinator selection

I agree to notify the Digital Services Coordinator to which this data access application has been submitted in case of any changes to the information provided in this form, including after accessing the requested data *

☐ I commit

Either DSC where VLOP is headquartered or DSC where research organization is headquartered

DSC of establishment	Companies and their very large online platforms/search engines
 Cyprus	Aylo (Pornhub)
 Czechia	NKL (XNXX) WebGroup Czech Republic (XVideos)
 Germany	Zalando
 Ireland	Alphabet (Google Maps, Google Play, Google Search, Google Shopping, YouTube) Apple (App Store) ByteDance (TikTok) Infinite Styles Services (Shein) Meta (Facebook, Instagram) Microsoft (Bing, LinkedIn) Pinterest Whaleco (Temu) X
 Luxembourg	Amazon (Amazon Marketplace)
 Netherlands	Alibaba (AliExpress) Booking (Booking.com) Snap (Snapchat) Wikimedia (Wikipedia)

After the application is turned in

Application
arrives

5-10 working days

Completeness check

After the application is turned in

Application
arrives

5-10 working days

Completeness check

max. 35 working days

Initial assessment without consultation

max. 45 working days

Initial assessment with consultation

After the application is turned in

Application
arrives

5-10 working days

Completeness check

max. 35 working days

Initial assessment without consultation

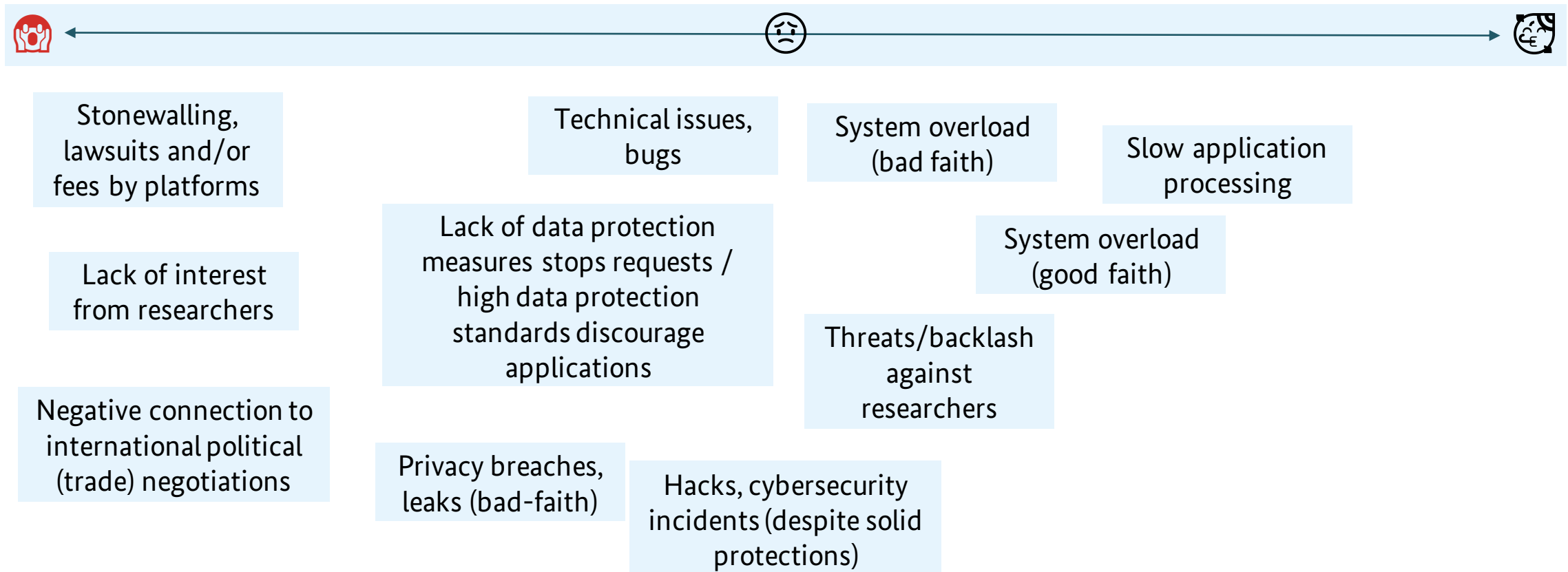
max. 45 working days

Initial assessment with consultation

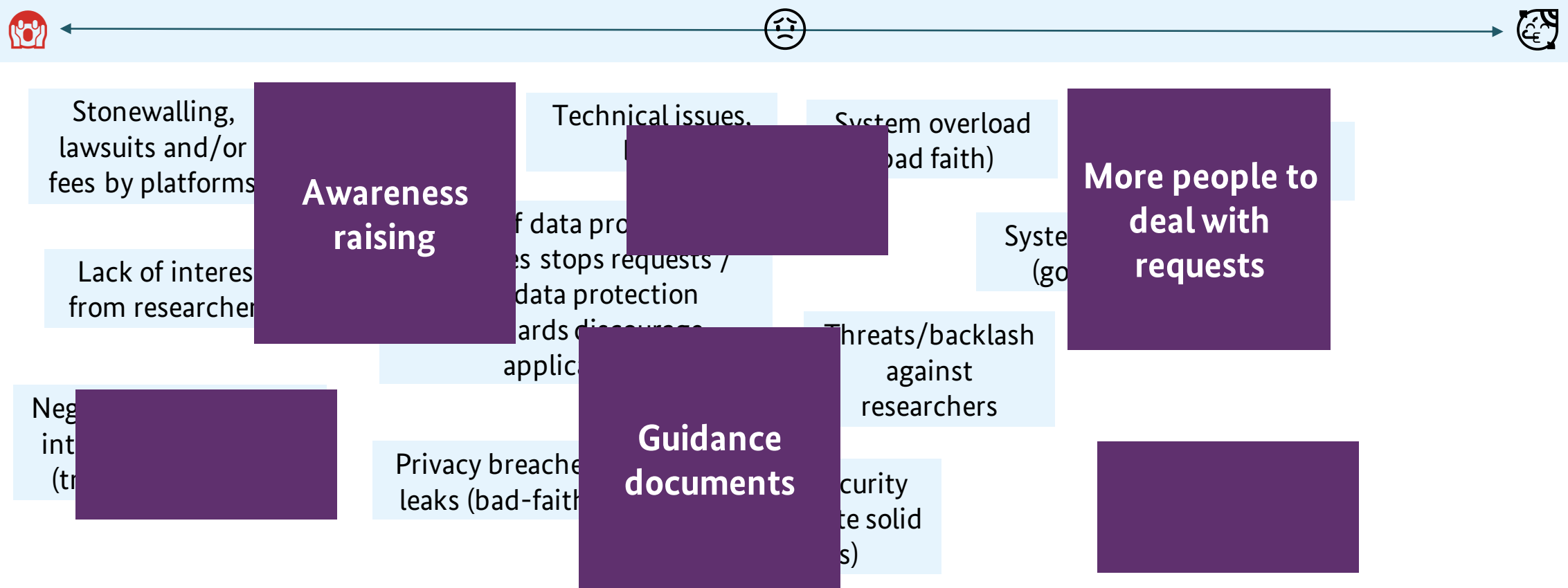
max. **80 working days**

Formulation of reasoned request

Scenarios: What can go right and wrong?



Outlook



Webinar for researchers
with Austrian DSC and Berlin data protection authority

Monday, **October 13, 2025**, 2-4pm, in German

Contact

Art40DSA@dsc.bund.de

Thank you!