

Data Act: handle data requests traceably

For product, data and service owners: classify one request involving a connected product and produce a traceable decision about scope, safeguards and delivery. Use a repeatable method and completed reference record instead of assuming that all data is freely available.

Working pack · Editable edition

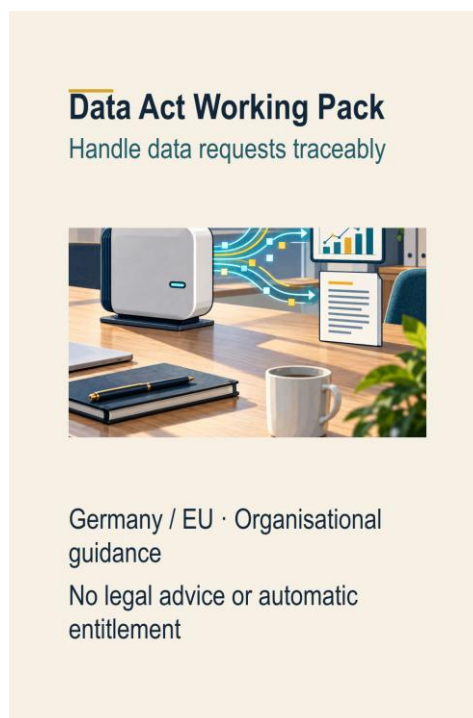


Figure 1 · Cover illustration; use the guide and completed records for the full detail.

Start here · Data Act: handle data requests traceably

Open the files

Extract the complete ZIP into its own folder first. In the top-level folder, open `data-act-guide-en.pdf` for the guide and `data-act-workbook-en.pdf` for the separate workbook. The matching DOCX files are editable. `data-act-full-en.pdf` also combines all cases, exercises, sources and licence information in one document. Further editable templates are in `editable/en/`; Markdown and CSV working files are in `package/en/`. The German edition is included too.

Version 1.0 · 2026-09-19 · Germany/EU

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Your first run

- Read `GUIDE_EN.md`; choose one case and accountable owner.
- Copy `WORKBOOK_EN.md` or CSV; complete 15 stable IDs using evidence.
- Have open issues and next steps reviewed; record actual execution separately.

Complete contents

- `GUIDE_EN.md`: detailed method, field instructions and glossary.
- `WORKBOOK_EN.md` and `WORKBOOK_EN.csv`: editable workbook.
- `CASES_EN.md` and `CASES_EN.csv`: two fully completed fictional cases.
- `TEAM_EXERCISE_EN.md`: exercise and solution.
- `LICENSE_EN.md`: internal-use licence.
- `WORKBOOK.csv`: shared CSV template with bilingual prompts.
- `SOURCES.md`: primary sources, locations and retrieval date.
- `VERSION_HISTORY.md`: version history.

No legal advice, certification, automatic entitlement or external action. All worked cases are fictional. English and German editions have the same Germany/EU scope.

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Make one data request manageable

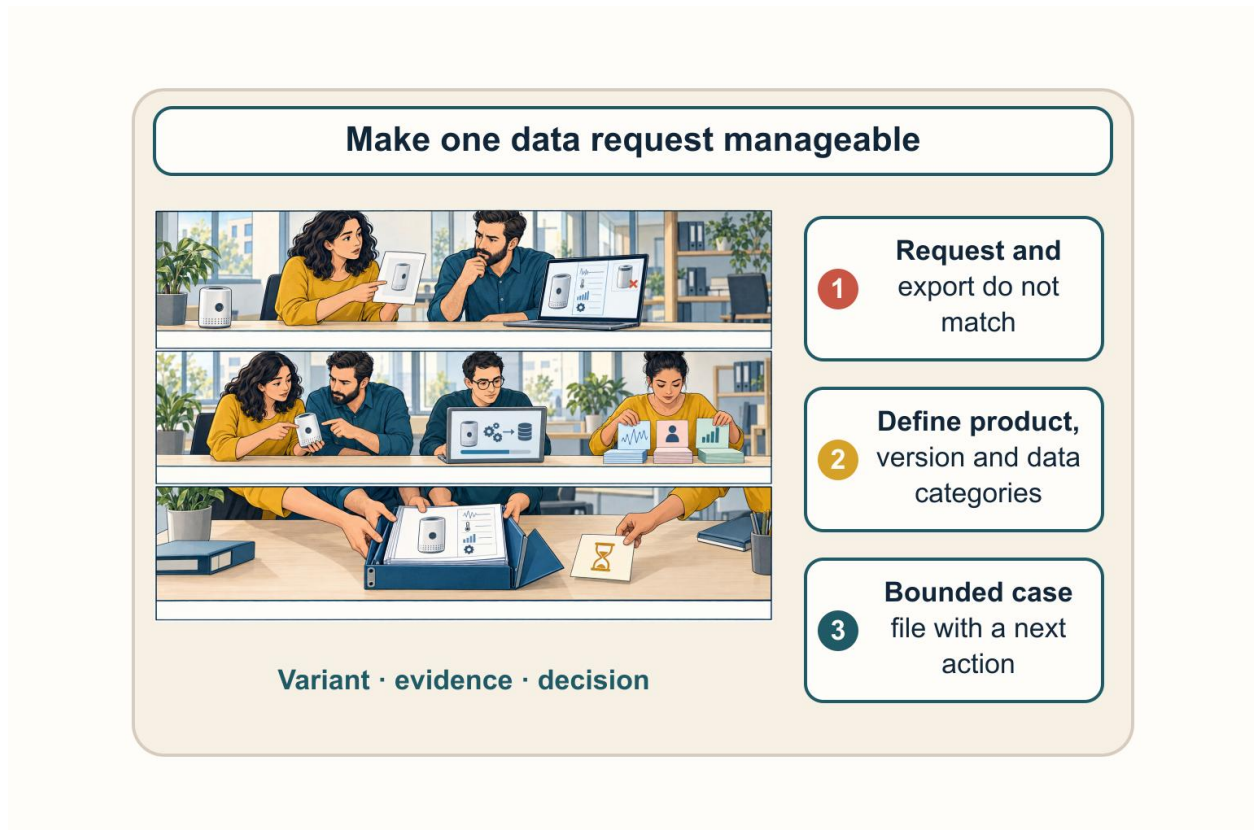


Figure 2 · Make one data request manageable. Situation, action and bounded result.

Start with an identified product, requester and period. A company-wide inventory is useful but does not answer an individual request. The workbook connects the technical source with the user's role, access route and actual fields to be supplied. Another person should understand the decision later without a verbal explanation.

Prepare product version, architecture note, data dictionary, user relationship and existing access route. Use synthetic data for the first run. A test export establishes whether timestamps and units are intelligible; it does not establish entitlement or complete the legal assessment. The output is a bounded decision record, not a finished contract.

Product connection, data categories and timing

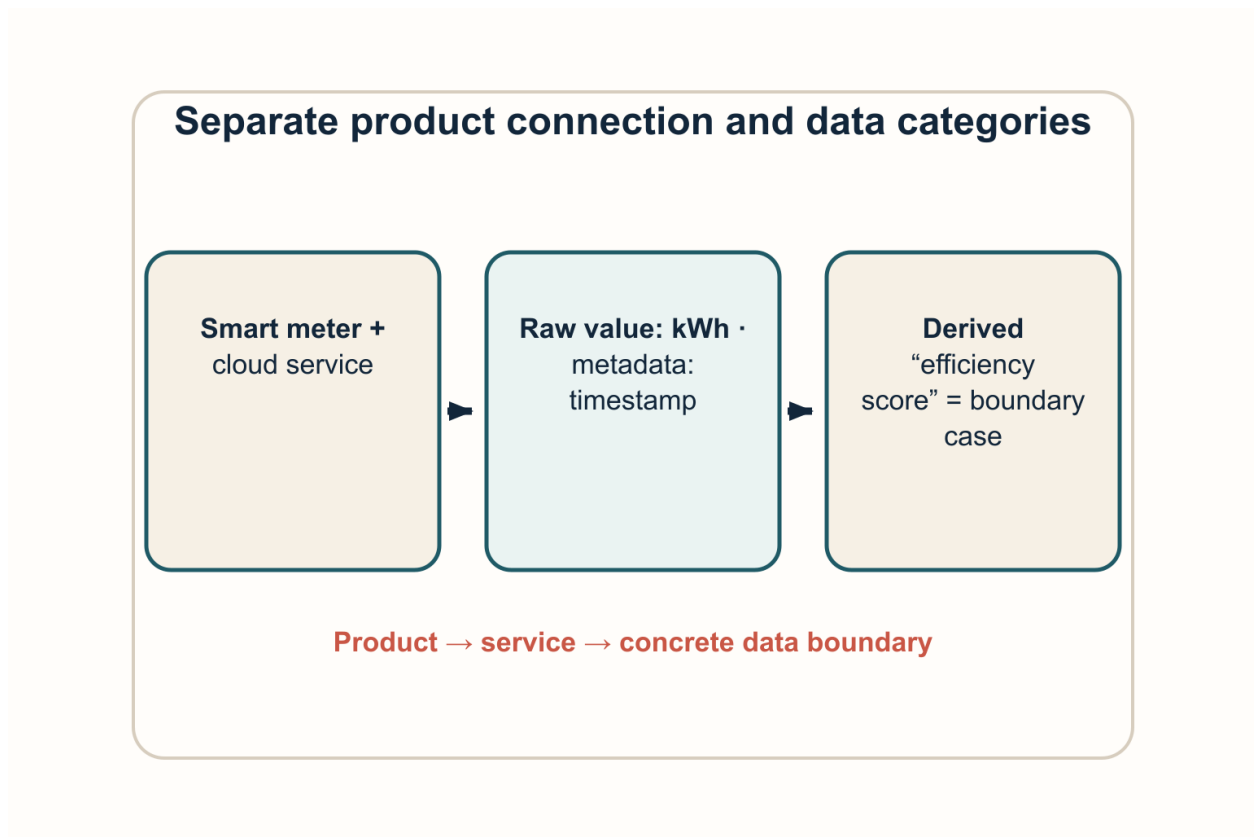


Figure 3 · Separate product connection and data categories. Situation, action and bounded result.

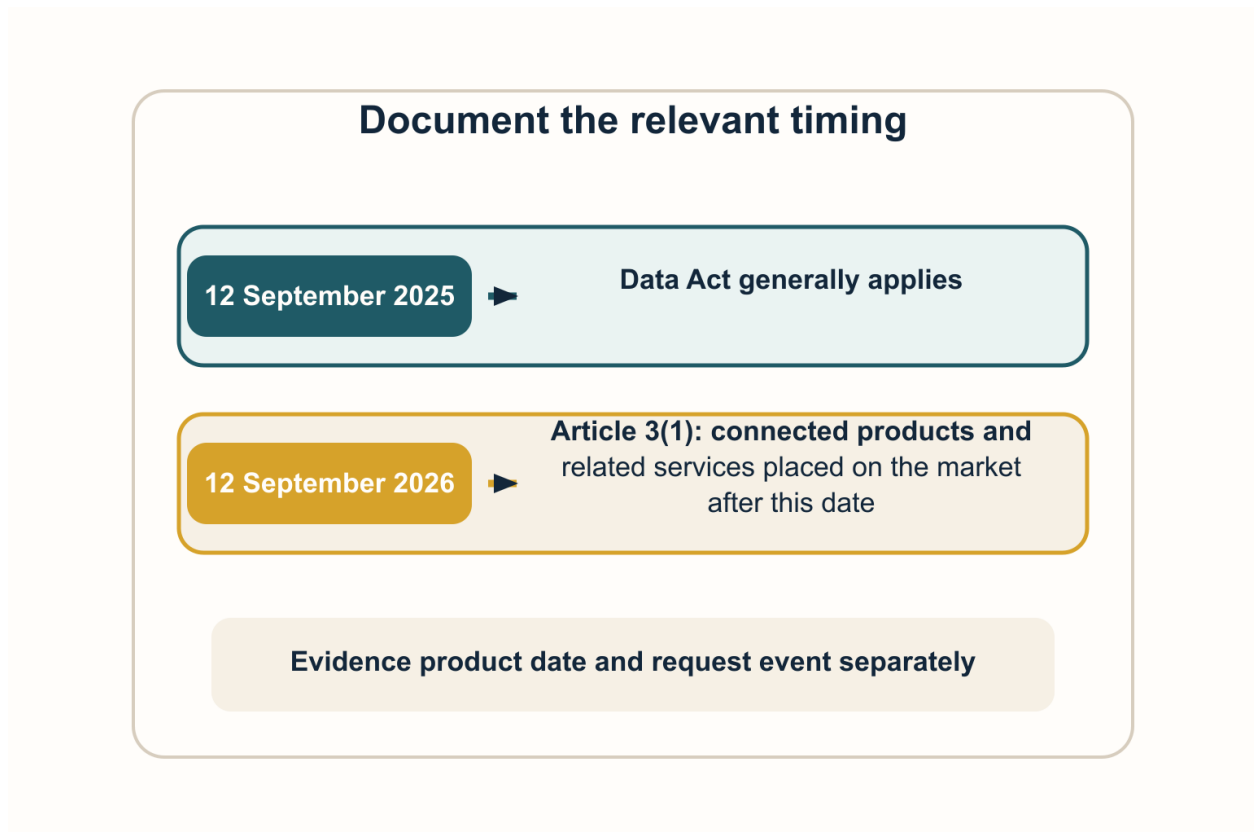


Figure 4 · Document the relevant timing. Situation, action and bounded result.

A connected product is not any software or brand website. Assess the actual item, generated use or environmental data, communication capability and primary-function limitation in Article 2(5). A related service needs the functional product connection in Article 2(6); buying additional consultancy does not itself make that consultancy a related service. [DA-C01, DA-C03]

The Regulation generally applies from 12 September 2025. Article 3(1) has a separate application to connected products and related services placed on the market after 12 September 2026. Record the relevant transaction and date, not merely the development date. Check the fact-dependent conditions and exceptions in Article 7 too; company size alone does not establish a blanket exemption. [DA-C02, DA-C03]

Distinguish product data, related-service data, necessary metadata and independently created analyses. A complex prediction is not automatically raw data. Record origin and processing so the responsible reviewer can assess a boundary case.

Separate user access from third-party sharing

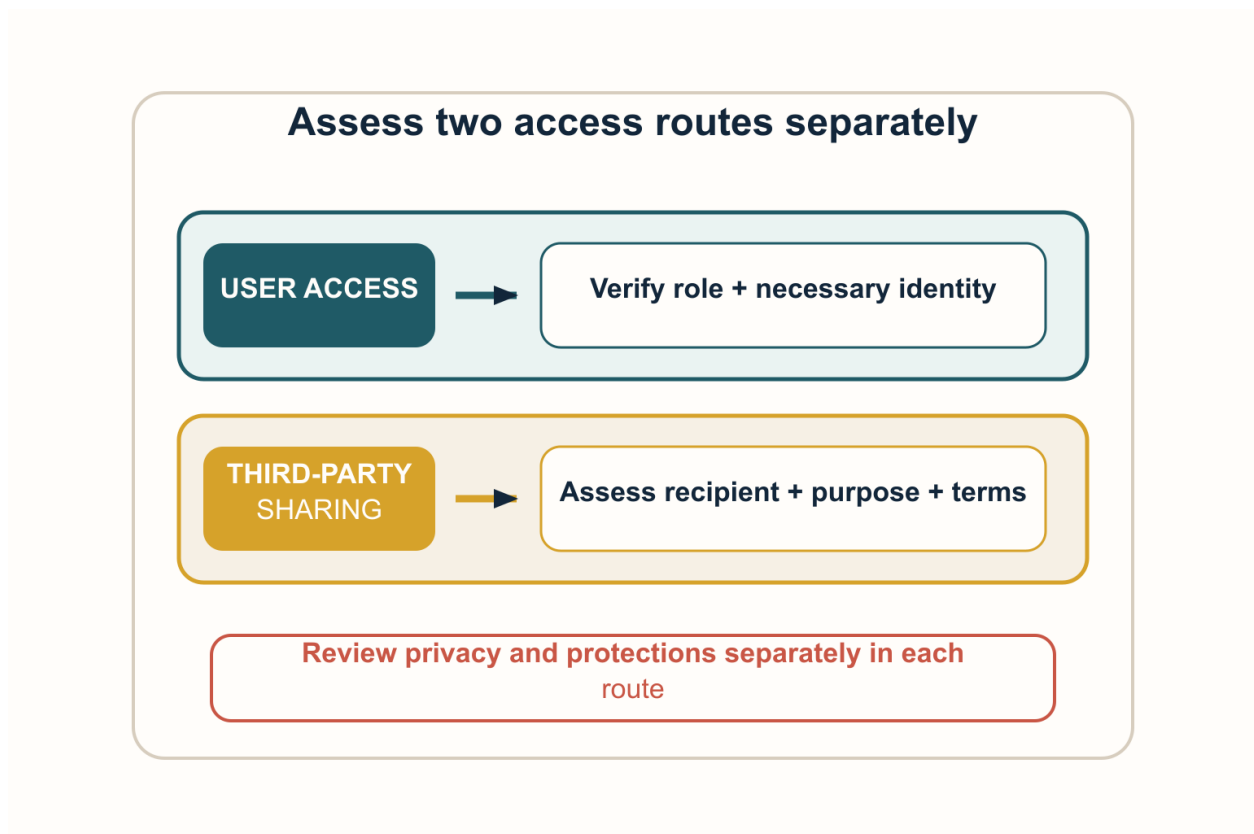


Figure 5 · Assess two access routes separately. Situation, action and bounded result.

Do not demand more information than necessary to verify user or third-party status. A user is not generally required to offer a commercially acceptable purpose to exercise their own access rights. Articles 4(5) and 5(4) limit additional information demands and retention of access information. The workbook must not become a pretext for extra access barriers. [DA-C03]

For sharing initiated by a user with a third party, the agreed purpose and conditions for that recipient matter; Article 6 of the Data Act sets obligations for third-party data recipients. Where personal data are processed, an appropriate legal basis under applicable data-protection law remains separately required;

Article 6 of the Data Act does not replace that assessment. Assess personal data, third-party rights and trade secrets concretely. “Confidential” is not a blanket reason to refuse. Identify affected fields and necessary safeguards; withholding or refusal requires the applicable conditions and, where required, notification to the competent authority. [DA-C03]

For voluntary fault diagnosis the team can record a voluntarily agreed selection. Do not remove employee_name from every lawful user-access request merely because the data holder considers it unnecessary for diagnosis. Distinguish technical relevance, the data-protection basis and the scope of an actual access right.

Normal route and technical rehearsal

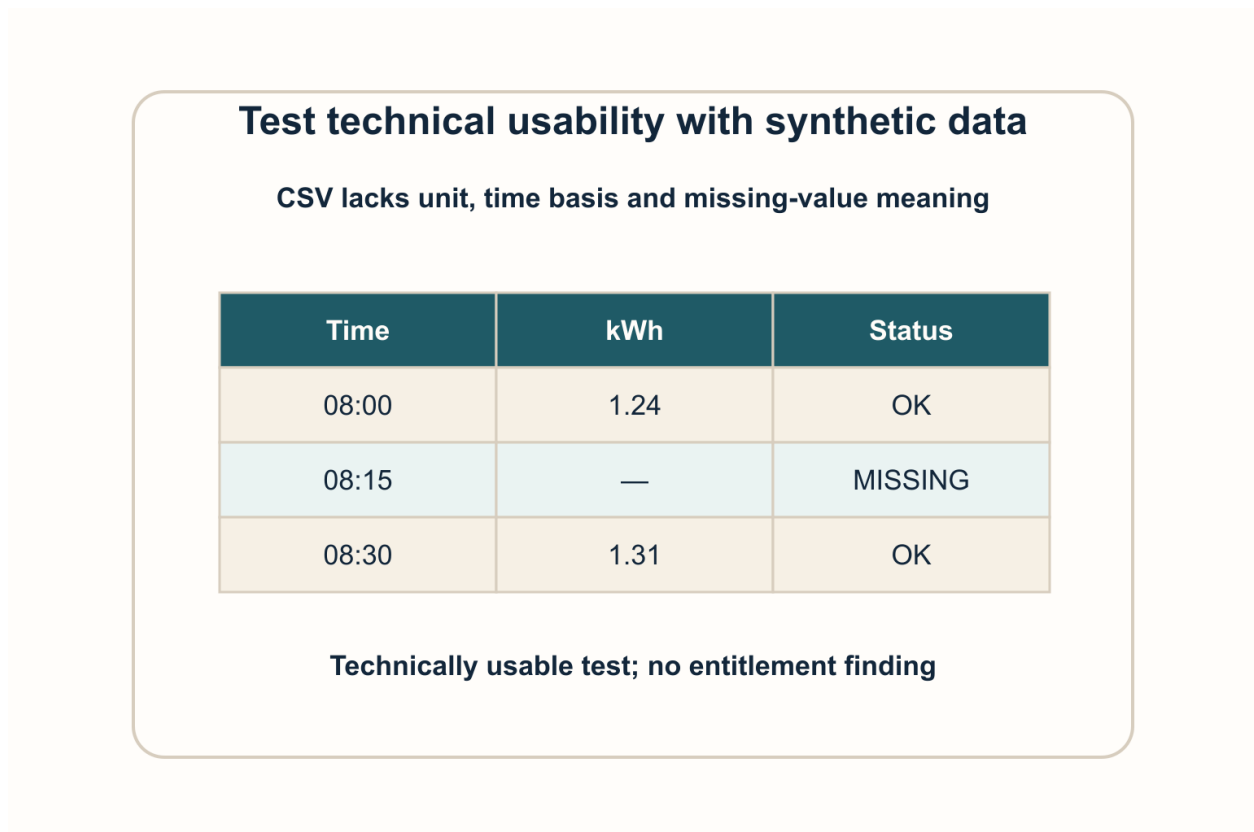


Figure 6 · Test technical usability with synthetic data. Situation, action and bounded result.

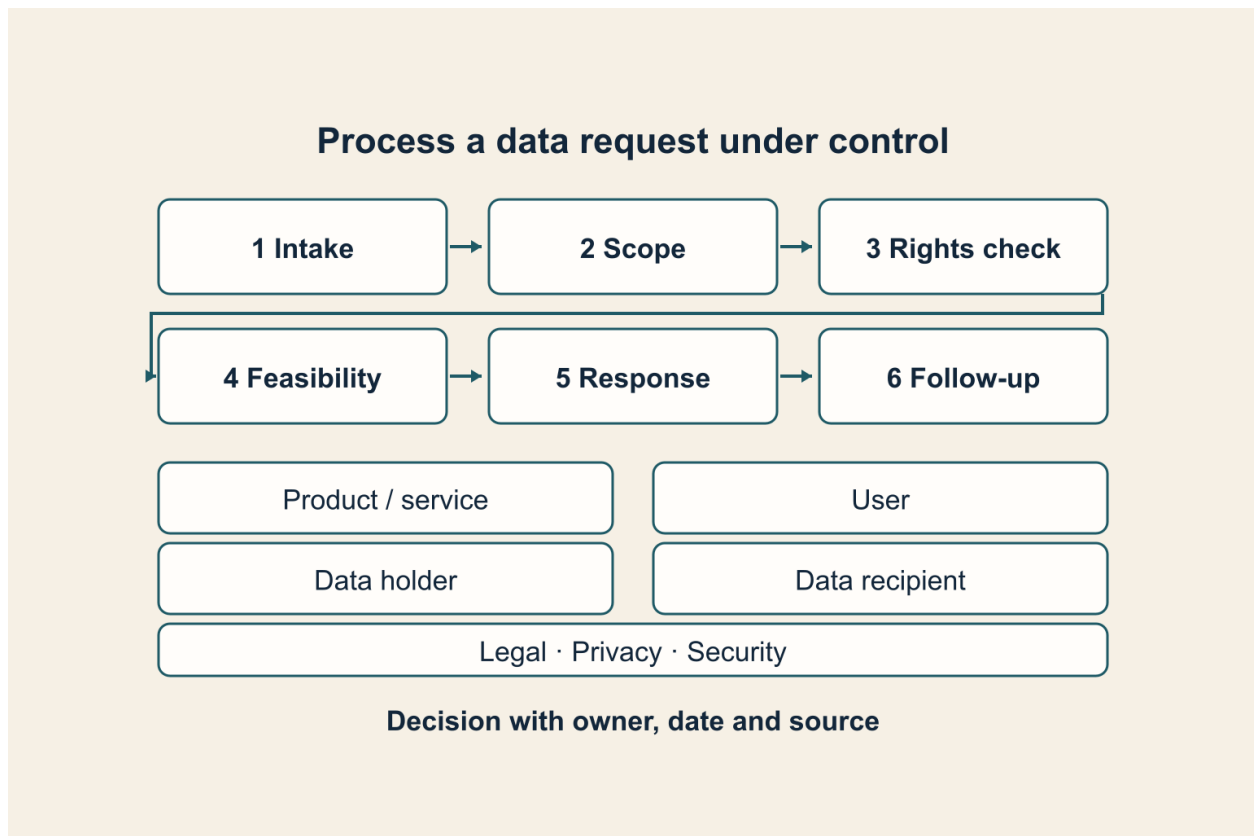


Figure 7 · Supplementary illustration; use the guide and completed records for the full detail.

Classify the request, confirm product and role, identify data scope and access route, then address specific protection questions. Test export with a small synthetic dataset. Supply timestamp convention, units, missing-value meaning and schema. A CSV that does not explain whether 20 means Celsius or Fahrenheit is not useful delivery.

Do not unnecessarily delay an existing lawful self-service route through this internal documentation. Apply manual assessment to a concrete unresolved point and record the reason, owner and next checkpoint. Record delivery only after it occurs. Keep purpose-limited evidence for the closed matter, not an indefinite record of every user action.

Cloud switching and public-sector requests are separate assessment routes. An ordinary product export does not automatically cover contract exit, interoperability or exceptional need. Mark these branches N/A with a factual reason when absent from the selected case.