### **Digital Service Act Article 40:**

### **Promise vs. Practice**

# Location ZeMKI, 26th of November 2026

# Room 60.070

# Workshop Program

14:15-14:30 Workshop presentation.

14:30-15:00 From ideation to consultation with the public by Dr Paloma Viejo Otero

**15:00-15:45** Article 40(4) DSA: Practical steps necessary for researchers in the "data access portal" by *Julian Jaursch* (Digital Service Coordinator, Germany)

15:45-16:00 Coffee Break

**16:00-16:30** Real-World Application and Lessons Learned by *LK Selling* (DSA 40 Data Access Collaboratory)

16:30-17:30 Hands-on workshop: Assembling a successful data access application

17:30-18:00 Conclusion & Next steps together

Dear Workshop Participants,

To make our time together on November 26th as productive as possible, we ask you to complete this preparatory assignment. The goal is not to produce a polished application, but to think deeply about your research needs and identify where you need guidance and support form your institution. Your honest reflections—including uncertainties and gaps—will help us tailor the workshop to address real challenges. Please bring your written responses to the workshop. We will use them as the foundation for group discussions and peer feedback.

#### **Task 1: Define Your Research Purpose**

Write a short narrative (one to two paragraphs) that explains your research project. Address the following:

- What is your research topic and why does it matter?
- What specific question(s) are you trying to answer?
- Which platform(s) do you need data from and why those particular platforms?

Most importantly, explain how your research connects to the DSA's core concerns. Your research *must* address **systemic risks** (such as illegal content, threats to fundamental rights, impacts on civic discourse, public health concerns, or protection of minors) and the **effectiveness of risk mitigation measures** (such as content moderation policies or recommendation system changes). Be specific about which risks you are investigating and why understanding them matters for the public interest.

### Task 2: Specify Your Data Requirements

For this task, think carefully about what data you actually need—not what would be nice to have, but what is essential for answering your research question.

For each type of data you plan to request, write a brief justification that covers:

- What specific data attributes or variables do you need (for example: post content, engagement metrics, user demographics, timestamps, geographic indicators)?
- What time period does your research require and why?
- Are there geographic or language limitations that would help narrow your request?
- Why is this particular data necessary? Could you answer your research question without it?

The Personal Data Challenge: If any of your requested data could identify individuals (directly or indirectly), you must address additional requirements. Explain why anonymised or pseudonymised data would not suffice for your research purposes. Consider how you will protect privacy, how long you will retain the data, and who else on your team will have access to it.

#### Task 3: Outline Your Methodology

Describe, in plain language, what you will actually do with the data once you have it. This is not about listing methods (statistical analysis, content analysis, etc.) but about explaining your analytical approach comprehensively.

#### Consider:

- What specific analyses will you conduct and in what sequence
- How does each analysis contribute to answering your research question?
- Will you combine platform data with other datasets? If so, which ones and why?
- What is your realistic timeline from data access to publication of results?
- Do you have the technical infrastructure and expertise to handle the data securely?

Be honest about uncertainties. If you are unsure about certain methodological choices, note them—these are excellent discussion points for the workshop.