

# Requesting Data via the EU DSA Portal

A step-by-step guide on how to request data via the EU Portal

# Today's Outline

1. **DSA Recap**
2. **Before Submission** - *what researchers really need to know*
3. **The application** - *page-by-page walk-through*
4. **After submission** - *the DSC process and timeline*
5. **Putting it all together** - *a complete example proposal*



# DSA Recap

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# DSA & Article 40

## What is the DSA?

- **EU regulation** governing online intermediaries: social media, marketplaces, search engines
- Special obligations for Very Large Online Platforms (**VLOPs**) and Search Engines (**VLOSEs**) with 45M+ monthly EU users
- **Goals:** safer digital space, fundamental rights protection, greater transparency

## Why does Article 40 matter for researchers?

- First **legally binding researcher data access** right in the EU (not voluntary)
- **Replaces the old model:** corporate-led, ad hoc, relationship-dependent
- Requires VLOPs/VLOSEs to grant access for research on systemic risks
- Enforced by the European Commission and national DSCs

# Two Pathways Under Article 40

- **Art. 40(12) - Public data access (lower bar)**

- Access to publicly accessible data on the platform's interface
- Conditions: independent from commercial interests · disclose funding · data security · proportionality
- Any researcher meeting these conditions — including non-profit affiliated — can apply

- **Art. 40(4) - Non-public data access (vetted researcher)**

- Access to non-public platform data via a formal application to a DSC
- Additional conditions: research institution affiliation · systemic risk focus · commit to free publication
- Governed by the Delegated Act (in force Oct 2025) and the new DSA Data Access Portal

⇒ **Today's session focuses on the Art. 40(4) vetted researcher pathway.**



**Before Submission**

02

# Which platforms can I request data from?

Official list · European Commission · Updated April 2026



- Only platforms formally designated as VLOPs or VLOSEs by the European Commission
- You must submit one separate application per platform (even if your research spans multiple VLOPs)

# What conditions must I meet to become a vetted researcher?

## **For Art. 40(12) public data - all researchers must:**

- Be independent from commercial interests
- Disclose research funding
- Fulfil data security and confidentiality requirements
- Request only data proportionate to the research purpose

## **Additional conditions for vetted status under Art. 40(4):**

- Affiliation with a research institution (Directive 2019/790, Art. 2(1))
- Research must target systemic risk detection/understanding or risk mitigation assessment
- Commit to publishing results free of charge

## What kind of data can I request?

**Research must contribute to the detection, identification and understanding of systemic risks under Article 34(1) of the DSA:**

1. Dissemination of illegal content
2. Negative effects on fundamental rights (dignity, privacy, expression, non-discrimination, children's rights)
3. Civic discourse, electoral processes, public security
4. Gender-based violence, public health, protection of minors
5. Serious negative effects on physical and mental well-being

*Practical tip: consult the platform's DSA data catalogue (to be published by each VLOP/VLOSE) and Delegated Act Recital 13 for indicative data types*

## What is the DSA Data Access Portal?

- The central tool for the entire Art. 40(4) application process
- Researchers submit applications, upload documents, and track progress via the portal
- VLOPs, VLOSEs, and DSCs also use it to communicate and manage requests
- Ensures a consistent process across all EU member states

**Portal address:** <https://data-access.dsa.ec.europa.eu/home>

- Live since October 2025 (applications can be submitted now)
- Issued reasoned requests (and their outcomes) are publicly visible on the portal

*Tip: every researcher on a team needs an EU Login account — get one before you start drafting the application.*

## What is a Digital Services Coordinator (DSC)?

- DSCs are independent national authorities appointed by each EU Member State
- They assess applications and decide whether to issue a formal reasoned data access request to the VLOP/VLOSE

### **Where to apply — choose one:**

- The DSC of the country where your research organisation is based
- The DSC of the country where the VLOP/VLOSE is established
- In either case, the DSC of establishment is ultimately responsible for the decision

## How will I know what data is available to request?

- VLOPs and VLOSEs must publish DSA data catalogues (collections of available data assets with metadata)
- Catalogues should cover data related to systemic risks identified in the platform's annual risk assessments
- Must be easily findable on the platform's online interface
- Catalogues are not exhaustive: you are not limited to what is listed
- Once access is granted, platforms must also provide metadata, codebooks, changelogs, and architectural documentation

*Note: catalogues are still being developed by platforms (check regularly for updates)*

## How will I access the data once my request is approved?

- The DSC specifies 'access modalities' in the reasoned request (exact conditions for data delivery)

### Two main access modes:

- **Data transmission:** data is sent to the researcher via an interface or storage system
- **Secure processing environment:** researcher accesses data remotely; no data leaves the platform
- Platforms cannot restrict the analytical tools or software libraries used by researchers (unless specified by the DSC)
- GDPR transfer rules apply if personal data is transferred across borders

## How long does the whole process take?

**Maximum: 80 working days from submission to the DSC's decision**

**Completeness check:**

5–10 working days: are all documents present?

**Initial assessment:**

Up to 35–45 working days: substantive review, possible expert consultation

**Reasoned request formulated:**

Sent to VLOP/VLOSE within the 80-day total window

*Realistically: plan for several months for early applications as DSCs develop capacity*

## What if a platform refuses to provide the requested data?

- Platforms can submit amendment requests to the DSC (but must give specific reasons)
- **Acceptable grounds:** data genuinely does not exist, or real technical restrictions (e.g. encryption)
- *Not acceptable: commercial interests cannot automatically block access (but may lead to modified access conditions)*
- Platforms can request voluntary mediation (within specified timeframes)

### **If a VLOP fails to provide public data (Art. 40(12)): report to the DSC or Commission**

- Formal proceedings already opened against X<sup>1</sup>, Meta<sup>3</sup>, TikTok<sup>3</sup>, and AliExpress<sup>2</sup>

[https://algorithmic-transparency.ec.europa.eu/news/faqs-dsa-data-access-researchers-2025-07-03\\_en](https://algorithmic-transparency.ec.europa.eu/news/faqs-dsa-data-access-researchers-2025-07-03_en)

1. [https://ec.europa.eu/commission/presscorner/detail/en/ip\\_24\\_3761](https://ec.europa.eu/commission/presscorner/detail/en/ip_24_3761)

2. <https://digital-strategy.ec.europa.eu/en/news/commission-makes-aliexpress-commitments-under-digital-services-act-binding>

3. <https://digital-strategy.ec.europa.eu/en/news/commission-preliminarily-finds-tiktok-and-meta-breach-their-transparency-obligations-under-digital>

# Limitations... and Why This Is an Opportunity

## Limitations to keep in mind

- Only VLOPs and VLOSEs are covered
- Formal vetting by a DSC is required
- Demanding privacy and data-protection requirements
- Research must address EU systemic risks
- One application per platform
- Timeline can be substantial

## Compare to the system before the DSA...

### The old model:

- Platforms decided who got access
- Ad hoc: "do I know someone there?"
- No legal obligation to share any data
- No consistent process

### Now:

- Legally binding
- Structured
- Independent of personal connections



# The Application

[data-access.dsa.ec.europa.eu](https://data-access.dsa.ec.europa.eu)

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# What Is a DSA Data Catalogue?

**Definition:** A platform's official list of datasets available to vetted researchers (with data structure, metadata, and suggested access modalities.)



## What it contains

- Available datasets
- Data structure & metadata
- Suggested access modalities
- Links to risk assessments



## What it is NOT








- Not exhaustive: you are not limited to what is listed
- Not legally binding on the scope of your request



## Why consult it

- Identify what exists before writing your proposal
- Make your data request specific & credible
- Show the DSC reviewer you did your homework

# DSA Data Catalogues: Where to Find Them

Platform	Catalogue / Resource URL	Key data available	Status
X (Twitter)	<a href="https://help.x.com/en/rules-and-policies/dsa-vetted-researchers">help.x.com/en/rules-and-policies/dsa-vetted-researchers</a>	Posts, engagement metrics, accounts	 <b>Published</b>
Meta (FB/IG)	<a href="https://transparency.meta.com/researchtools/other-data-catalogue">transparency.meta.com/researchtools/other-data-catalogue</a>	Posts, URL shares, ad targeting, Content Library API	 <b>Published</b>
TikTok	<a href="https://tiktok.com/legal/page/global/privacy-data-sharing-with-researchers/en">tiktok.com/legal/page/global/privacy-data-sharing-with-researchers/en</a>	Videos, comments, account data	 <b>Partial</b>
Booking.com	<a href="https://dsarequests.moderation.booking.com/hc/en-gb">dsarequests.moderation.booking.com/hc/en-gb</a>	Accommodation listings, review data	 <b>Published</b>
YouTube/Google	<a href="https://research.google/tools">research.google/tools</a>	Video metadata, comments, search trends	 <b>Partial</b>
LinkedIn	Beta API — application only (no public catalogue yet)	Limited public page data	 <b>Limited</b>
Others (Zalando, Snapchat...)	Check platform transparency pages directly	Varies by platform	 <b>Not yet</b>



# X (Twitter)

[help.x.com/en/rules-and-policies/dsa-vetted-researchers](https://help.x.com/en/rules-and-policies/dsa-vetted-researchers)

## 📁 Data available in catalogue

- **Public posts:** ID, timestamp, edit history
- **Engagement:** likes, reposts, replies, views
- Sensitive content flags
- Who-can-interact settings
- **Account data:** profile, verification status, follower/following counts, creation date, country
- **Ad repository:** all ads + targeting criteria

## ? Possible research questions

- *Does the Community Notes system correct misinformation at different rates across EU languages and member states?*
- *Do political advertisers on X systematically target EU users differently by member state during election periods?*
- *Do accounts with high follower counts and verified status generate disproportionate reach for content flagged as sensitive in the EU?*

# Meta — Facebook & Instagram

 [transparency.meta.com/researchtools/other-data-catalogue](https://transparency.meta.com/researchtools/other-data-catalogue)

## Data available in catalogue

- Public **posts, comments, reactions** (Content Library API)
- **URL Shares dataset:** who viewed/shared URLs publicly on FB (2017–2022)
- **Ad Library:** all active/inactive ads + reach by gender, age, country
- **Ad targeting criteria** selected by advertisers
- **Virtual cleanroom access** for sensitive data (no export)

## Possible research questions

- *Do URLs containing health misinformation circulate differently across EU demographic groups on Facebook?*
- *Is well-being of teen Instagram users in the EU correlated with specific content consumption patterns?*
- *Does the reach of political content on Facebook vary systematically by type of URL source (mainstream media vs. alternative outlets) across EU member states?*



TikTok

[tiktok.com/legal/page/global/privacy-data-sharing-with-researchers/en](https://tiktok.com/legal/page/global/privacy-data-sharing-with-researchers/en)

### 📁 Data available in catalogue

- **Public videos:** likes, comments, favorites, voice-to-text..
- STEM feed eligibility metadata
- Hashtags, creation timestamp, playlist info
- **Comments:** text, likes, replies, timestamps
- **Accounts:** bio, country code, username, follower/following
- **Ad targeting:** gender, age group, Member State of users

### ? Possible research questions

- *Do videos eligible for the STEM feed receive systematically higher engagement than non-STEM videos on the same topic in EU countries?*
- *Does the language of hashtags used in political videos predict differences in comment sentiment across EU member states?*
- *Are verified accounts systematically associated with faster or wider diffusion of content flagged in Community Guidelines reports?*



# Booking.com

 [dsarequests.moderation.booking.com/hc/en-gb](https://dsarequests.moderation.booking.com/hc/en-gb)

## Data available in catalogue

- **Accommodation listings data** (type, location, price...)
- User reviews and ratings
- **Partner information:** verification status, response rates
- **Content moderation** actions on listings and reviews
- **Ad and ranking data** (how listings are promoted)

## Possible research questions

- *Are fake listing detection rates systematically lower in specific EU member states?*
- *How does the time-to-action on user notices about illegal listings differ across EU countries, and does it change after a formal government order?*
- *Does the ratio of fake reviews removed pre- vs. post-publication vary by country of listing in the EU?*

# Application Structure

- **Page 1 — Researcher information and declarations**

- Who is applying: team members, affiliations, independence evidence

- **Page 2 — Research project-specific information**

- Funding · Research topic · Necessity & proportionality · Data protection · Data security · Publication

- **Page 3 — Summary of the application**

- Full application overview before submission

- **Page 4 — Additional Information**

- Choice of DSC

- **Page 5 — Review & Submit**

- Final check and formal submission

# Page 1 — Researcher information and declarations

**Goal:** show who is behind the application and that research is your institution's primary purpose

**Every researcher on the team needs an EU Login account before the application can be submitted**

- The principal researcher invites co-researchers (the application cannot be submitted until all are added)

## **Uploads:**

- **Mandatory:** Evidence of institutional affiliation (show that research is the organisation's primary purpose and that no commercial third party receives preferential data access)
- **Optional but strongly recommended:** Documents demonstrating independence from commercial interests

## **Good evidence examples:**

- Work contracts · institutional statutes or founding laws · financial commitments · proof of membership in academic associations

# Page 1 — Researcher information and declarations

## Researcher information - Personal details & academic affiliation

Principal researcher

### Applicant name

Virginia Morini

Researcher organisation

Existing organisation

### Organisation name

Select organisation...

### Organisation type

-

### Affiliation type \*

Postdoctoral fellow

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

Drag and drop file here

## Researcher information - information about commercial independence

I confirm and declare that I have disclosed all potential commercial interests and notwithstanding any disclosures, that I am independent from commercial interests. I also declare that the information disclosed is true and complete to the best of my knowledge (i) \*

I confirm

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

Drag and drop file here

## Page 2 — Funding

**Goal: show the source, amount, and duration of all funding for the research**

- **Cover all financial funding:** grants, institutional budgets, contracts
- **Also cover non-financial contributions:** infrastructure, software, computing time provided by third parties
- If funding does not cover the full research period, explain in the **optional supporting evidence** field how the gap will be addressed

### Good evidence examples:

- Grant agreements · signed funder letters · funding commitment documents

## Page 2 — Funding

**Funding source 1**

**Nature of funding** ⓘ \*  
Public

**EU Funding**  
 Yes  No

**Country of establishment** ⓘ \*  
[Empty dropdown]

**Name of funding source** \* [100]  
[Empty text box]

**Reference to number of grant** [100]  
[Empty text box]

**Year in which the funding was obtained** \*  
Select year [Calendar icon]

**Duration of the funding** \*  
Start Date — End Date [Calendar icon]

**Where relevant, amount (in EUR)**  
[Empty text box] EUR

### Relevant supporting evidence

Choose file Drag and drop file here

## Page 2 — Research Topic & Data Requested

**Goal: specify which VLOP you are studying, what data you need, and how it links to a systemic risk**

### One application per VLOP

- If your study spans multiple platforms, file a separate application for each one
- Be **as specific as possible** about the systemic risk or risk-mitigation angle you are studying
- State the **purpose** and the **time window** for data use clearly (access is purpose- and time-limited)
- Consult the platform's **DSA data catalogue** and Delegated Act Recital 13 for indicative data types

*Note: This part depends on your scientific judgment (regulators provide little prescription here)*

# Page 2 — Research Topic & Data Requested

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 [i](#)

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Research topic \*

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. \*

 -  

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

2000

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, scope and, where possible, the specific attributes, relevant metadata and data documentation \*

2000

## Page 2 — Necessity & Proportionality

**Goal: prove you cannot answer your research question with less data or non-personal data**

### Key questions your application must address:

- Can I answer this research question with less data?
- Can I use non-personal or anonymized data instead? If not explain why not
- What anonymization and data minimization measures will you apply?

### Good evidence examples:

- Data management plan · data protection impact assessment (DPIA) · if unavailable, a document explaining why

## Page 2 — Necessity & 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 \*

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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

## Page 2 — Data Protection (GDPR)

**Goal: describe the full GDPR data lifecycle, from collection and storage to retention and deletion**

**One of the most closely reviewed sections (data protection authorities may be directly involved)**

### State the GDPR legal basis for processing the requested data

- Clarification: Art. 40 DSA is the basis for the application; here the portal asks about the GDPR basis for the data use

### Good evidence examples:

Data management plan · DPIA · data retention policies

· evidence of data protection training or certification

Does the data requested include personal data?

Yes  No

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

2000

*Tip: involve your institution's data protection officer early*

## Page 2 — Data Security & Confidentiality

**Goal: show that your infrastructure protects the platform's confidential information and trade secrets**

**Required even if your research does not use personal data**

- In the portal this is called 'technical and organisational measures' (TOMs)

**Good evidence examples:**

- Information security policies · Access and activity logging procedures
- Physical security of your research environment
- Anti-intrusion and cybersecurity policies
- ISO 27001 / 27002 certification

Please indicate if the data pose sensitivities in terms of confidentiality, data security and personal data protection, including any data processing risk. Include 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



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## Page 2 — Publication Commitment

**Goal: commit to publishing your results openly and free of charge, with a concrete date**

- Tick the commitment checkbox and provide an expected publication date
- Upload supporting documentation if available: open-access funding commitment, publication timeline, journal agreements

### Why it matters:

- Open publication is a legal condition of vetted researcher status

*Practical note: check your funder's open-access requirements and align your publication plan before applying.*

Commitment of all applicants 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



# Page 3 — Summary of the application

**Goal: Review the complete application before submission**

Summary of the application for publication in the DSA data access portal

The data provider from which data are requested for the purpose of carrying out the research

-

The research topic \*

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Description of the data requested, including its format, its scope and, where possible, specific data points \*

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Overview of the proposed access modalities through which data could be made accessible to the applicants \*

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## Page 4 — Additional Information

**Goal: decide the DSC of your proposal**

### You may submit to one of two DSCs:

- The DSC of the country where your research organisation is based
- The DSC of the country where the VLOP/VLOSE is established (the 'DSC of establishment')

*Practical note: In either case, the DSC of establishment makes the final decision*

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 from the country of establishment of the data provider immediately in case of any changes \*  
to the information provided in this form, including after accessing the requested data

I commit

Additional document 1 ⓘ Name of the document \*

## Page 5 — Review & Submit

**Goal: confirm all information is correct and formally submit the application**

Researcher information and declarations	 Edit	▼
Research project-specific information	 Edit	▼
Summary of the application	 Edit	▼
Additional information	 Edit	▼



**After the Application**

05

# After the Application: The DSC Process



**!** *First reasoned requests realistically expected several months after portal launch — plan your research timeline accordingly.*

# Scenarios: What Can Go Right and Wrong?

## Challenges

- Demanding data protection & privacy requirements may discourage researchers from applying
- Platforms vary in their willingness to cooperate
- Potential political backlash or threats against researchers
- DSCs building capacity: early applications may take longer
- Long overall timelines can reduce motivation

## Opportunities

- Legally binding pathway replaces ad-hoc, corporate-controlled access
- Consistent, transparent process across all EU member states
- Amendment / mediation mechanism if VLOP resists
- Enforcement actions already opened (X, Meta, TikTok, AliExpress)
- Outcomes of requests made publicly visible on the portal



# Putting it all together

[data-access.dsa.ec.europa.eu](https://data-access.dsa.ec.europa.eu)  
[lecture resources](#)

*Walking through a real application on the portal together*