

Från: "Gustaf Molander" <gustaf.molander@regeringskansliet.se>
Skickat: den 23 mars 2022 15:41:07
Till: "I Registrator" <i.registrator@regeringskansliet.se>
Ämne: VB: DSA - comments on recommender systems compromise proposals
Categories: SW

Från: Eleanor Flanagan <eleanorkatef@spotify.com>
Skickat: den 22 mars 2022 14:05
Till: Kristin Olsson <kristin.olsson@gov.se>
Kopia: Francesco Versace <francescov@spotify.com>
Ämne: DSA - comments on recommender systems compromise proposals

Hi Kristin,

Apologies for the barrage of emails this week!

I wanted to write in view of the WP today to share a few comments from Spotify regarding the latest compromise proposals on Recommender Systems, in case it is helpful.

- We support the evolution of the text of **Art.24a** (transparency requirements), which is now much clearer. In addition, the main parameters to be disclosed (Art.24a(2)) are more feasible to implement from a technical perspective. We also welcome a clarification in a Recital that these rules do not prejudice IP rights and trade secrets.
- Regarding **Art.29**, the obligation on VLOPs to provide opt-out functionality "*on the specific section of the interface where the information is being prioritised*" should not be retained in the text. This is overly prescriptive, and an implementation choice that should be left to the platform to find the most appropriate solution for their user experience. We also continue to have reservations about how user-friendly an obligation to provide an opt-out for each recommender system used by the platform will be, in addition to the technical complexities involved.

I am of course available to discuss further if needed, and happy to discuss in more detail next week.

Best wishes,
Eleanor

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Eleanor Flanagan
Senior Manager, European Affairs
37 Square de Meeûs, Brussels
+32 (0) 498 43 02 22 | eleanorkatef@spotify.com | www.spotify.com

