



**Ministry of Infrastructure**  
Digitisation Unit Berfin Eken  
berfin.eken@regeringskansliet.se

## Notes of meeting with Google on DSA

*Meeting participants: Sara Övreby and Milan Zubicek (Google), Gustaf Molander and Berfin Eken (ESD) and Mattias Karlsson Jernbäcker (UD III)*

The meeting was held at Google's initiative and aimed to develop their views.

Have concerns about "user redress". Think courts are the right place but out-of-court dispute resolution bodies are OK. Doesn't think it's clear in what order the process should go.

EP proposals for further measures to be protested against - too broad. See line 249 of the EP proposal "the demotion of, or imposes other measures with regard to..."

Samt rad 262: (a) decisions to remove, demote, or disable access to or impose other measures that restrict visibility, availability or accessibility of the information.

Also questions the possibility of objecting to decisions *not to* take action under Article 17 (Council proposal). Suggests that only trusted notifiers should be allowed to use such a possibility.

Regarding online marketplaces: the Google Play of them may be in scope. Important to clarify the definition of online marketplace, want the definition to include only that the contract is concluded on the platform itself.

Also points to recital 39 where the EP included all "intermediary services" to the principle of KYBC, stating that it would be disproportionate.

Are also critical of the EP's proposal to extend the rules for online marketplaces, which could involve general surveillance. What is the difference between having to do "random checks" and having to check all products.

Access to data by public authorities, such as Article 9, and for "vetted researchers". Also Art. 15a on reporting suspicion of a crime, should require that there is an urgent threat to health. Also questions whether Art. 31 on access to data should include non-profit organisations as proposed by the EP. (See proposal in Art. 31(4)).

As regards the restriction of targeted marketing, they consider that the DSA is not the right forum to deal with these issues. As regards "minors", they want to be sure that minors can be identified on the platforms. Regarding the reference to sensitive personal data under the GDPR, they believe that "behavioural" targeting should rather be discussed. There are overlapping proposals also in the DMA.

Also wants longer application period and considers EP proposal of 6 months too short.

The meeting was closed.