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Access to car data: Impacts of new legislation and opportunities for digital services

Prepared for FIA Region I

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FIA REGION I

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Key points meant to be addressed by EU Data Act and Annex X

	EU data act	Annex X
 OEMs	• Shift from “data ownership” toward controlled but broader data sharing obligations. • Architecture and backend design becoming strategic levers.	• Stronger cybersecurity enforcement. Ability to restrict access • OEMs must support other in-vehicle means, APIs, wireless connections and remote access solutions where they are used by the manufacturer or its network.
 Third-party service providers	• Improve access to diagnostic and maintenance data. • Not necessarily access to advanced OEM analytics or vehicle control functions.	• More information channels other than OBD (Vehicle API, backend servers). • Enhanced ability to repair EVs. • Comply with authentication and security requirements. • Only basic/raw OBD access remains free; server-based services may incur charges.
 End consumers	• Better data portability. • More service choice. • Potentially more competitive maintenance and digital-service offers.	• Reduce lock-in to OEM workshops. • More offering for EV related services and repairs from third parties.

Key actions derived from EU Data Act and Annex X

	EU data act	Annex X
 OEMs	• Map the retrievable and available data • Reassess what data is exposed • Prepare more structured access mechanisms	• Publish more detailed repair and diagnostics information. • Provide clear guidelines for fees and misuse of data that could lead to restriction. • Enforce stronger monitoring and access to certain data types and repair processes.
 Third-party service providers	• **Understand potential benefits of newly available data,** especial focus on battery status, ADAS information and fault codes. • **Understand which OEMs are better positioned to share data. Push the ones that are lacking to do so.**	• **Raise awareness to consumers around the ability to service ADAS systems and EVs.** • Gain knowledge on additional access channels • Comply with authentication and security requirements set by OEMs. • **Train repairers and members on the benefits and impacts.**
 End consumers	• Allow data access for desired third parties. • Have higher awareness on the required permissions and data-sharing settings	• Look for alternative sources to repair other than OEM network if needed. • Have higher awareness on the type of repairs and battery systems that can now be repaired by third parties.

Increase awareness to end consumers on the changes brought by both the Data Act and the Annex X **is fundamental for FIA members** to increase take up rates of existing and new services.

How OEMs are approaching the EU Data Act in reality?



BMW, Ford, Mercedes-Benz and Volkswagen are the best-positioned OEMs to support FIA members with data access.



BYD, Tesla and Toyota remain somewhat restrictive in practice regarding data access. FIA members might struggle to access and ingest data from these OEMs.



Only BMW provides a clear a and publicly available pricing model and structure. FIA members need to engage in conversations to better understand the financial viability of accessing the data.

Note: SBD analysed the 10 highest selling OEM groups (by volume) in Europe.

OEMs' relative positioning around EU Data Act compliance

Parameter	BMW	BYD	Ford	Hyundai	Mercedes	Renault	Stellantis	Toyota	Tesla	VW
User Data Access	CarData portal, strong user access.	Requestable structured vehicle data.	Dedicated gateways.	User request based data access.	Guided user data access.	Structured user access.	Structured user data access.	GDPR access, no full Data Act portal yet.	Limited, GDPR-based access.	Data Hub portal, full cross-brand access.
Third-Party Data Sharing	Consent-based CarData sharing.	Data export to third parties, not streamlined.	User-authorized sharing.	Consent mechanisms exist.	Authorized sharing supported.	Consent-based sharing.	User-authorized sharing.	Consent allowed; structured B2B access emerging.	No EU Data Act portal; GDPR requests only.	Data Hub + VEDAS for B2B/B2G.
Data Scope	Core vehicle data shared; sensitive data restricted.	Structured categories, limited details.	Extensive vehicle, driving, EV, charging and location data.	Extensive coverage across telematics, diagnostics, EV.	Broad telematics coverage.	Covers telematics, diagnostics, EV and mobility data.	Covers diagnostics, usage, location, ADAS and event data.	Defined in notices, not fully productized.	GDPR based access data not mapped to data act.	Broad, well-documented vehicle data domains.
Transparency	Clear portals and technical docs.	Published Data Act notice, with no view on data.	Detailed data categories.	Clear privacy consent.	Clear pre-contract notices.	Clear privacy, consent.	Detailed rights.	Strong privacy/legal info.	No Data Act-specific notices.	Clear EU Data Act portals and guidance.
Inter-operability	Standard REST APIs; machine-readable formats.	Machine-readable (JSON/DBC) formats.	JSON-based APIs and continuous data.	APIs support internal services.	Structured, machine-readable formats.	APIs and connected platforms available.	Supports JSON and machine-readable data formats.	Internal platforms, few open APIs.	No documented Data Act API.	Unified platform, limited public specs.
Access by Design Readiness	Backend-mediated access.	User and limited third-party access.	Real-time API architecture.	Implementation details are not yet visible.	Designed for access-by-default.	Connected architecture supports access.	Centralized access model.	Framework ready, details evolving.	Proprietary architecture and not explicitly aligned.	VEDAS/Data Hub built for Data Act access.
Contractual Fairness	Clear pricing structure.	Free, no undue delay access for users.	Third parties may be charged.	No evidence of commercial frameworks.	Terms support user rights.	Commercial terms exist; pricing not publicly disclosed.	Commercial terms exist.	EU-aligned contracts; limited Data Act detail.	No Data Act-specific contractual framework.	Non-discriminatory intent; prices unclear.

Not all use cases are highly relevant for all FIA members.

Use Case	Other stakeholders (DFRS, DRVN)	Roadside providers' members
Pre-emptive maintenance	High	High
Roadside assistance event	High	High
Remote servicing	High	High
Smart charging (EV data points)	Not discussed	High
Remote vehicle check (one point in time)	Not discussed	High
Insurer FNOL (First Notice of Loss)	Medium	High
Driver behaviour and coaching	Medium	Medium
Road condition reporting	Medium	Low
Used Car Certificate	Medium	Medium
Battery health and EV route planning	Medium	Low
Tolls and Parking	High	Low
Support OEM data profile	Low	Low
Usage-based insurance (UBI)	Low	High
Feature usage analysis	Low	Low



Data points used by the majority of use cases are covered under the EU data act, so FIA members should be able to deliver such use cases.



Cost reduction, more safety and UX are highly relevant to end consumers. FIA members should highlight how existing or future services provide such.

Main partnership recommendations for FIA members

	Use case	Potential partners	How to engage?
Consider (Low complexity, high uptake)	• Roadside assistance • Pre-emptive maintenance • Insurer FNOL	• COVESA • AISIN / BOSCH • GeoTab / Octo Telematics	• Sharing and aggregating data from partners • Providing data to key third parties, e.g. insurers
Monitor (Medium complexity, medium uptake)	• Remote servicing • Used car certificate • Driver behaviour and coaching • Usage-based Insurance • Battery health and EV route planning • Support OEM data profile • Tolls and parking	• Lexis Nexis • Chargetrip • Urgently.ly • ARC Europe	• Use infrastructure to enhance existing data with car clubs' information
Ignore (High complexity, low uptake)	• Road condition reporting • Feature usage analysis	• TISA • NHTSA / FHWA • NIRA Dynamics • CEDR	• Best practices sharing • Standardising formatting and data sharing practices

Challenges & Recommendations

Challenge	SBD Recommends
Percentage of cars in EU '**Car Parc**' with OEM connectivity is currently <25%.	Focus on use cases that don't require majority of connected cars to work.
Lack of **awareness** among consumers about data portability rights: OEMs dragging feet.	Build use cases with strong customer appeal so that they want to know more – create 'pull'.
No standard way for consumers to give consent to OEMs, let alone **delegate consent**.	Seek best practice from other sectors for delegated consent – e.g. Network/ISP switching.
No harmonised **access methods** to OEM data sets. No dominant data aggregator.	Assess aggregators in market to determine which could potentially provide normalised data access.
No established **standard for data sets**. Volume and type of data is variable across OEMs.	Build use cases that are viable with lowest common denominator or enhanced by better sets. Support activities such as COVESA for standardisation.
Variable, non-harmonised **pricing** permitted by OEMs for API access.	Prioritise use cases which require 'on-demand' vehicle data (eg roadside assistance) rather than constant data – eg driver behaviour profiling.

Challenges & Recommendations for regulators

Challenge	SBD Recommends
Lack of **awareness** among consumers about data portability rights: OEMs dragging feet.	Make educational campaigns aimed at end users about their Data Portability rights. FIA could support these efforts.
No standard way for consumers to give consent to OEMs, let alone **delegate consent**.	FIA or EU Commission could provide best practices for a simple UX or mandate a clear button or process to give consent (similar to “two-click” termination law).
No established **standard for data sets**. Volume and type of data is variable across OEMs.	Regulation could be updated to consider some specifications along the format of the information
There might be pushback/discomfort on providing certain types of data.	FIA could either make Auto-sector specific 'best practice' guidance for consumer/B2B implementation of the Act, or go further and lobby EU for more formal updates to sector-specific annex(es).

Key pain points found for FIA members

1. Awareness from end consumers (lots of money invested but people are not aware of what Data Act means).

2. Consent process very cumbersome (a streamlined and adequate UX process lacking).

3. Inconsistency on data sets being provided across brands.

4. Uptime assurance of the services / Promises or guarantees that OEMs are making.

5. High cost for always-on services that in some cases do not need to be as such.

Additional Considerations

1. Value lies on enhancing existing use cases with more data rather than creating new ones just for the sake of creating them.

2. Ensure the use cases keep working in abnormal conditions (e.g. underground, no connection zones).

3. Leverage use cases that use punctual pulls of data rather than a continuous flux.

Thank you!



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Do you have any questions?

If you have any questions or feedback about this proposal, you can contact us at info@sbdautomotive.com or discuss with your account manager.

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