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**Sent:** Monday, 23 December 2019 11:50 AM  
**To:** ai2ip  
**Subject:** response to issue #10 of DRAFT ISSUES PAPER ON INTELLECTUAL PROPERTY POLICY AND ARTIFICIAL INTELLIGENCE

### Issue 10: Further Rights in Relation to Data

- (i) Should IP policy consider the creation of new rights in relation to data or are current IP rights, unfair competition laws and similar protection regimes, contractual arrangements and technological measures sufficient to protect data? *i think data transfer agreement could be good for protection and use.*
- (ii) If new IP rights were to be considered for data, what types of data would be the subject of protection? *Any data that may have some commercial potential*
- (iii) If new IP rights were to be considered for data, what would be the policy reasons for considering the creation of any such rights?
- (iv) If new IP rights were to be considered for data, what IP rights would be appropriate, exclusive rights or rights of remuneration or both? *Might be both.*
- (v) Would any new rights be based on the inherent qualities of data (such as its commercial value) or on protection against certain forms of competition or activity in relation to certain classes of data that are deemed to be inappropriate or unfair, or on both? *I think for both.*
- (vi) How would any such rights affect the free flow of data that may be necessary for the improvement of AI, science, technology or business applications of AI? *Data potentially should be accessible for improvement of AI, science, technology or business applications*
- (vii) How would any new IP rights affect or interact with other policy frameworks in relation to data, such as privacy or security?
- (viii) How would any new IP rights be effectively enforced?

Ali Allawati