



**Response to
United States Agency for International Development
Request for Information on an**

AI in Global Development Playbook

March 1, 2024

The Global Data Alliance¹ (GDA) welcomes the opportunity to share its views on the United States Agency for International Development (USAID) Request for Information on an AI in Global Development Playbook (RFI).

I. Introduction

The RFI covers a broad range of topics, including principles, tools, and best practices for advancing AI in a risk-aware manner. Our comments focus on how the facilitation of cross-border access to knowledge, information, ideas, and digital tools can support AI for global development.

The GDA is a cross-industry coalition of companies, headquartered in different regions of the world, that are committed to high standards of data privacy and security. GDA members share a deep and abiding commitment to supporting economic development across regions, technologies, and business models. The GDA engages on the cross-border data policy matters with diverse economies, including Bangladesh, Cambodia, India, Indonesia, Kenya, Malaysia, Nigeria, Pakistan, the Philippines, South Africa, Vietnam, and other countries across Africa, Asia, Latin America, and the Caribbean.²

We strongly endorse the RFI's support for the more effective development and deployment of AI to facilitate economic development goals. Cross-border data transfers are critical to the development and deployment of human-centric and development-centric AI for the benefit of communities across the globe. The AI in global development playbook should recognize the importance of AI to businesses across sectors and the role of cross-border data transfers in supporting the responsible development and use of AI systems worldwide.

In the discussion that follows, we address the role of cross-border data to AI in global development specifically and to economic development goals more broadly.

II. Cross-Border Data and AI in Global Development

AI is critical to advancing economic developing and digital inclusion goals, including under the UN's Sustainable Development Goals 2030. Cross-border access to knowledge, information, and digital tools is necessary to realize the benefits of AI, even in everyday uses.

AI involves the application of analytical techniques to a variety of data (structured and unstructured) available or generated in various locales, that can be accessed or transferred across borders, and then consolidated into larger data sets. From developing predictive models to deploying and using analytical solutions, AI systems are trained and fine tuned by consolidating large and diverse data sets from around the world to identify underlying patterns, relationships, and trends that are then transformed into

mathematical models that can make predictions based on new data inputs. These data sets often originate from geographically dispersed sources, such as data from IoT sensors, across global digital networks, making it imperative that data can move and be accessed seamlessly and securely across borders.

Responsible development of AI systems, supported by data inputs from across the globe, can help mitigate the impacts of climate change, fuel advancements in healthcare, transform education, optimize agriculture, improve access to finance, reinforce the operation of global telecommunications networks, enhance customer engagement, and create new economic opportunities.³ Examples of AI for global development include:

- Predictive climate modeling to prepare for severe weather events in developing economies based on computational analysis of satellite data, weather station data, topographical information, and various IoT and sensor data.⁴ Similarly, improved carbon tracking and mitigation to reduce climate change impacts in developing economies based on computational analysis of transportation logs, meter readings, fuel purchase records, atmospheric pollution tracking, and visual monitoring of power plants and other facilities, and other data sources.⁵
- Computational analysis to map vulnerable seaside areas in low-lying archipelagos and delta regions (e.g., in Bangladesh) to produce cyclone risk maps and guide investment plans for cyclone shelters, schools, health facilities, and other infrastructure for disaster planning and survivability.⁶
- Cross-border data analytics can help speed the early identification of potentially useful drug candidates, including for tropical and rare diseases, shortening pharmaceutical discovery timelines from years to months. This analysis depends upon data transferred from across the world containing information on “chemical properties [and] genetic information...to improve target-based discovery.”⁷ For example, AI helped fast-track the COVID-19 vaccine, cutting timelines from years to months, as researchers analyzed data transferred from around the world to quickly identify potential vaccine treatments.⁸
- In healthcare delivery, AI tools can help improve health outcomes for remote and medically underserved populations across developing countries, in contexts where: (1) supporting online healthcare education tools used by international health and development agencies; (2) cross-border consultations between remote providers in one country with specialists located at research facilities abroad; (3) cross-border consolidation of anonymized data sets from around the world to enhance real-time analysis and response to emerging epidemics or localized disease outbreaks; and (4) cross-border humanitarian assistance is also possible through “telemedicine networks [that]...deliver humanitarian services on a routine basis, many to low-income countries.”
- AI-driven models to combat financial fraud, money laundering, corrupt payments, and terrorist financing: AI is an essential tool in the fight against a range of financial challenges that are particularly relevant to US relations with developing country partners. For example, core operations of financial institutions include payments and remittance services that require the use of AI-based fraud prevention tools as part of transactions processing. To build effective anti-fraud and other financial tools, transactions need to be analyzed instantaneously via AI tools in centralized locations to identify potentially problematic activity. Requiring the localization of such data and infrastructure results in less effective AI models and make it more for developing economies to combat fraud, money laundering, or other improper financial practices.

As developing countries consider approaches to AI policies, they should avoid isolation, fragmentation and undue restrictions on cross-border access to knowledge, information and digital tools (e.g., via data localization mandates or onerous transfer restrictions) that will impede the ability to maximize the potential of AI for global development.

III. Cross-Border Data and Economic Development

Cross-border access to knowledge, information, ideas, and digital tools are not only critical to AI in global development, but also economic development and digital inclusion more specifically. As the [World Bank](#) has noted, “[r]estrictions on data flows have large negative consequences on the productivity of local companies using digital technologies and especially on trade in services.” Restrictions on cross-border access to knowledge, information, and digital tools harm GDP ([minus 0.7-1.7%](#)); investment flows ([minus 4%](#)); productivity ([4.5% loss](#)); and small business ([up to 80% higher trade costs](#)).

These burdens are borne most heavily by [developing and least developing economies](#). As the [United Nations](#) has stated,

Regulatory fragmentation in the digital landscape...is most likely to adversely impact low-income countries, less well-off individuals, and marginalized communities the world over, as well as worsen structural discrimination against women. A future of exclusionary digital development must be avoided at all costs.

As stated by [UNCTAD](#):

Divergent data nationalism...reduces market opportunities for domestic MSMEs to reach worldwide markets, [and]...reduces opportunities for digital innovation, including various missed opportunities for inclusive development that can be facilitated by engaging in data-sharing through strong international cooperation...[M]ost small, developing economies will lose opportunities for raising their digital competitiveness.

Despite their heavy costs to developing economies, [cross-border data restrictiveness](#) continues to increase, including among the largest economies. It is estimated that these restrictions increased by [600%](#) between 2013 and 2019 in the Asia-Pacific, and increased at a rate [five times](#) higher in 2022 than in 2021.

The world now faces the threat of significant lost opportunities for economic development and digital inclusion among small developing economies as a result of exclusionary data policies adopted by large developed economies (like the EU, China, or the United States) or large developing economies (such as India or South Africa). According to the [World Bank and World Trade Organization](#), developing countries have benefited from the most rapid growth in services exports (primarily digital services) among all economy income groups.

- Between 2001 and 2021, commercial service exports increased by [300%](#) for least developed economies and by [250%](#) for other developing countries.⁹
- As of 2021, Micro-, Small-, and Medium-Sized Enterprises (MSMEs) accounted for [67 percent](#) of all cross-border services exports.¹⁰

- Between 2001 and 2021, there has been a 58% increase in female employment in services in low-income economies, outpacing the rate of increase in all other country income groupings. 6 in 10 employed women work in the services sector, including digital services.¹¹
- According to the [World Bank](#), “[s]tudies show that countries would gain on average about 4.5 percent in productivity if they removed their restrictive data policies.”
- The [Organisation for Economic Co-operation and Development](#) has found that a 0.1 point reduction in a country’s level of digital services trade restrictiveness is associated with a 145% increase in overall exports.
- As USAID has stated, digital ecosystems have the potential to equip informal merchants, women entrepreneurs, small farmers, and small businesses engaged in cross-border trade with access to markets and information facilitated by cross-border data flows.¹²
- There is a 15% estimated increase in developing country share of global services if developing countries fully adopt digital tools, including through cross-border access to cloud and software-enabled technologies – many powered by AI.¹³
- AI-focused jobs have high growth potential in developing countries – with recently projected growth rates of 400% in Malaysia and 130% in the Philippines (among other markets).¹⁴
- Digital tools help MSMEs in Asia reduce export costs by 82% and transaction times by 29%.¹⁵

Cross-border access to knowledge, information, and digital tools is critical to many developing country [economic](#) and other [policy objectives](#): Not only do restrictive cross-border policies fail to protect [privacy and personal data](#),¹⁶ but they also hurt [developing countries](#)¹⁷ and [small businesses](#);¹⁸ impede [financial equity and inclusion](#);¹⁹ undermine data security and [cybersecurity](#);²⁰ threaten [human rights](#);²¹ slow science and [innovation](#);²² and impair various [health and safety](#),²³ [environmental](#),²⁴ and other [regulatory compliance](#) priorities.²⁵ Data transfers are critical to the health of developing economies [across all sectors](#)²⁶ and at [every stage of the value chain](#).²⁷

For more information, please see the Annex to this submission, as well as the GDA’s Report on [Cross-Border Data Transfers & Economic Development](#), [GDA Cross-Border Data Policy Index](#),²⁸ the [GDA Sector Studies](#),²⁹ and the [GDA Issue Briefs](#).³⁰

IV. Conclusion

Thank you for the opportunity to provide comments. We look forward to serving as a resource as you continue to create an AI in global development playbook.

¹ The Global Data Alliance is a cross-industry coalition of companies that are committed to high standards of data responsibility and that rely on the ability to transfer data around the world to innovate and create jobs. GDA member companies are headquartered across the globe and are active in over 15 industry sectors. For more information on the Global Data Alliance, please see: <https://www.globaldataalliance.org>

² For access to prior GDA submissions to developing economies on cross-border data policy matters, please see this webpage: Global Data Alliance, Filings – Search Function (2024), at: https://globaldataalliance.org/resources-results/?pub_type=resource-filings&posts_filtered=1

³ See BSA | The Software Alliance, Everyday AI for Businesses, available at <https://www.bsa.org/files/policy-filings/08012023aibusiness.pdf>.

⁴ Schneider et al., *Harnessing AI and computing to advance climate modelling and prediction*, 13 *Nature Climate Change* 887 (2023), at: <https://www.nature.com/articles/s41558-023-01769-3>; World Economic Forum, *The role of machine learning in helping to save the planet* (2021), at: <https://www.weforum.org/agenda/2021/08/how-is-machine-learning-helping-us-to-create-more-sophisticated-climate-change-models/>; Kaak et al., *Aligning artificial intelligence with climate change mitigation*, 12 *Nature Climate Change* 518 (2022), at <https://www.nature.com/articles/s41558-022-01377-7>; Xin et al., *Artificial Intelligence for Climate Change Risk Prediction, Adaptation, & Mitigation*, *Ecological Processes* (2021), at:

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- <https://www.springeropen.com/collections/AICC>; Chantry et al., *Opportunities and challenges for machine learning in weather and climate modelling*, 379 *Phil. Trans. R. Soc. 83* (2020), at: <https://doi.org/10.1098/rsta.2020.0083> (2020).
- ⁵ See e.g., Global Data Alliance, *Cross-Border Data Transfers & Environmental Sustainability* (2023) (internal citations omitted), at: <https://globaldataalliance.org/wp-content/uploads/2023/04/04192023gdacbdtsustainability.pdf>
- ⁶ See *id.*
- ⁷ See generally, Global Data Alliance, *Cross-Border Data Transfers & Biopharmaceutical R&D* (2022), at: <https://globaldataalliance.org/wp-content/uploads/2021/09/09092021cbdtbiopharma.pdf>
- ⁸ Ganes Kesari, *Why Covid Will Make AI Go Mainstream In 2021*, *Forbes* (Dec. 2020), <https://www.forbes.com/sites/ganeskesari/2020/12/21/why-covid-will-make-ai-go-mainstream-in2021-top-3-trends-for-enterprises/?sh=48c8f9cd797a>; Arshadi et al., *Artificial Intelligence for COVID19 Drug Discovery and Vaccine Development*, *Front. Artif. Intell.* (Aug. 2020), <https://www.frontiersin.org/articles/10.3389/frai.2020.00065/full>
- ⁹ *The World Bank and the WTO, Trade in Services and Development* (2023)
- ¹⁰ *Id.*
- ¹¹ *Id.*
- ¹² USAID Digital Strategy, 2020-2024, 37, available at https://www.usaid.gov/sites/default/files/2022-05/USAID_Digital_Strategy.pdf.
- ¹³ *Id.* at 4.
- ¹⁴ Brenda Quismorio, *Capability building for data analytics and artificial intelligence*, UNCTAD Intergovernmental Group of Experts (IGE) on E-Commerce and the Digital Economy (2019), at: https://unctad.org/system/files/non-official-document/tdb_edc3_2019_p11_BQuismorio_en.pdf
- ¹⁵ Alphabet, *Micro-Revolution: The New Stakeholders of Trade in APAC* (2019).
- ¹⁶ Global Data Alliance, *Cross-Border Data Transfers & Privacy* (2023), at: <https://globaldataalliance.org/issues/privacy/>
- ¹⁷ Global Data Alliance, *Cross-Border Data Transfers & Economic Development* (2023), at: <https://globaldataalliance.org/issues/economic-development/>
- ¹⁸ Global Data Alliance, *Cross-Border Data Transfers & Small Businesses* (2023), at: <https://globaldataalliance.org/issues/small-businesses/>
- ¹⁹ Global Data Alliance, *Cross-Border Data Transfers & Finance* (2020), at: <https://globaldataalliance.org/sectors/finance/>
- ²⁰ Global Data Alliance, *Cross-Border Data Transfers & Cybersecurity* (2023), at: <https://globaldataalliance.org/issues/cybersecurity/>
- ²¹ Freedom House, *Countering an Authoritarian Overhaul of the Internet* (2022), at: <https://freedomhouse.org/report/freedom-net/2022/countering-authoritarian-overhaul-internet> Freedom House explains the nexus between data transfer restrictions and human rights abuse as follows (emphasis added): “In at least 23 countries covered by Freedom the Net, laws that limit where and how personal data can flow were proposed or passed during the coverage period. ... The transfer of data across jurisdictions is central to the functioning of the global internet and benefits ordinary users, including by improving internet speeds, enabling companies to provide critical services worldwide, and allowing the storage of records in the most secure data centers available. ... [S]ome [countries] have buried problematic obligations that either mandate domestic data storage, feature blanket exceptions for national security or state actors without safeguards, or delegate increased decision-making power to politicized regulators—all of which renders users vulnerable to government abuse despite improvements pertaining to the use of personal data for commercial purposes. Such contradictory “data washing” measures ultimately fail to strengthen privacy and further fragment the internet....”
- ²² Global Data Alliance, *Cross-Border Data Transfers & Innovation* (2023), at: <https://globaldataalliance.org/issues/innovation/>
- ²³ Global Data Alliance, *Cross-Border Data Transfers & Biopharmaceutical R&D* (2022), at <https://globaldataalliance.org/sectors/biopharmaceutical-rd/>; Global Data Alliance, *Cross-Border Data Transfers & Medical Technology* (2023), at: <https://globaldataalliance.org/sectors/medical-technology/>; Global Data Alliance, *Cross-Border Data Transfers & Healthcare* (2022), at: <https://globaldataalliance.org/sectors/healthcare/>
- ²⁴ Global Data Alliance, *Cross-Border Data Transfers & Environmental Sustainability* (2023), at: <https://globaldataalliance.org/issues/environmental-sustainability/>
- ²⁵ Global Data Alliance, *Cross-Border Data Transfers & Regulatory Compliance* (2023), at: <https://globaldataalliance.org/issues/regulatory-compliance/>
- ²⁶ Global Data Alliance, *Cross Border Data - Creating Jobs in Every Sector* (2020), at: <https://globaldataalliance.org/wp-content/uploads/2021/07/GDAeverysector.pdf>
- ²⁷ Global Data Alliance, *Jobs in All Sectors Depend upon Data Flows* (2020), at: <https://globaldataalliance.org/wp-content/uploads/2021/07/infographicgda.pdf>
- ²⁸ Global Data Alliance, *Cross-Border Data Policy Index* (2023), at: <https://globaldataalliance.org/resource/cross-border-data-policy-index/>
- ²⁹ Global Data Alliance, *GDA Sector Studies* (2023), at: <https://globaldataalliance.org/sectors/>
- ³⁰ Global Data Alliance, *GDA Issue Briefs* (2023), at: <https://globaldataalliance.org/issues/>

Annex

The Benefits to Economic Development of Cross-Border Access to Knowledge, Information, and Digital Tools

Cross-border data transfers are critical to economic development. Cross-border access to data, which may embody knowledge, technological tools, and new business opportunities, are critical to enhancing living standards for the world's most vulnerable populations.

As explained below, the ability to transfer data across borders and leverage the benefits of data originating from different geographies is critical to: (1) delivering productivity benefits to MSMEs and other companies, and helping them access overseas markets and supply chains, and buyers and suppliers; (2) growing agricultural output; (3) delivering diagnostic services, developing new medical treatments, and otherwise protecting population health; and (4) ensuring digital trust and security. We address each of these points below.

The ability of MSMEs in developing countries to access global markets and to offer and sell their services and products abroad depends upon cross-border access to the data and cloud-enabled technologies. Cross-border access to e-commerce platforms, purchasers, suppliers, and other commercial partners allow local MSMEs to engage in international transactions and create jobs at home. Kenya, one of Africa's leading digital economies, makes this case in its 2019 Digital Economy Blueprint, noting that “[e]very citizen will benefit and find value” in a cross-border digital economy that makes their “goods, services and expertise... accessible across borders, opening up markets and catapulting Kenya to join 1st world markets where citizens benefit from direct access to global markets.” Cross-border digital market access offers Kenya “a leapfrogging opportunity on economic development.”¹

Agricultural output in developing countries can be increased through technologies that depend upon cross-border access to data and cloud enabled technologies. Small- and large-scale farmers alike are better positioned for success in planting, harvesting, and selling their agricultural products when they benefit from cross-border access to: (a) satellite and meteorological data across regions, (b) real-time insights on planting and harvesting seasons, and (c) information on cost-effective techniques for crop development and protection as well as sales opportunities.

Remote health services for medically underserved populations, and the search for tomorrow's medical treatments also depend upon cross-border access to data and cloud enabled technologies. Cross-border access to remote health service technology platforms help remote and medically underserved population groups secure diagnostics, consultation, and preventative care and treatments that might otherwise not be available. Similarly, cross-border access to clinical testing and other biopharmaceutical R&D data aids in the study and development of treatments for diseases – including infectious and lifestyle diseases that are globally prevalent, as well as rare and neglected diseases.

Building trust in developing digital economies by keeping personal data confidential, secure, and free from misuse often depends upon cross-border access to data and cloud enabled technologies. Cross-border access to cloud-based and AI enhanced cyber security solutions that

reside in data centers abroad helps protect developing country users from cyber-crime, fraud, theft of valuable information, and other abusive online behavior. A digital economy that can support economic development requires first and foremost an environment that offers adequate security and confidentiality for persons to be able to freely engage remotely with others in personal and business interactions without fear of being compromised. From a technological perspective, cloud-enabled software security solutions require the real-time ability to consolidate and analyze data from diverse sources and regions in order to identify anomalies and security risks.

Advances in financial inclusiveness, financial transparency, and financial security across developing countries also depend upon cross-border access to data and cloud-enabled technologies. There are over 2.5 billion unbanked people worldwide, many living on remote and isolated locations lacking in banks or other on-the-ground financial service providers.² Technologies that leverage data flows are powerful tools to increase access to financial services, helping individuals achieve sustainable livelihoods. These include:

- **Microlending:** Increasingly, microfinance institutions use technologies based on data flows to allow them to provide better loans, achieve greater repayment rates, and lower interest rates for applicants. For example, in many developing countries, local financial institutions are able to offer micro-loans to citizens and businesses that would not otherwise have access to credit, using cloud-enabled data analytics to determine credit risk profiles and deliver loans through automated processes.³
- **Remittances to developing countries:** More than ever, remittances are of vital importance in developing countries. According to the World Bank, remittances to low and middle-income countries reached a record high of \$529 billion in 2018.⁴ Companies are also exploring the use of emerging technologies such as blockchain to provide speedier and cheaper remittance processes. Financial institutions that participated in the program reported savings between 40 and 70% in foreign exchange costs, and payment times averaging a few of seconds. Various other financial service companies are exploring innovative ways to leverage similar technologies to reduce costs and provide better remittance services to benefit more people.⁵
- **Credit-scoring for MSMEs and individuals in developing countries:** MSMEs, as well as some specific demographics may not have access to optimal lending opportunities if traditional credit scoring methods are employed. Cutting edge technologies such as data analytics (to review available past data) and artificial intelligence (to anticipate future outcomes) play an important role in the expansion of credit channels available to these underserved customers. These technologies heavily rely on cross border data flows. Oftentimes, the data used to enable the cloud-based service being delivered must travel across borders, even if the financial service provider and its customer are in the same country.⁶
- **Financial transparency, anti-corruption, and anti-money laundering:** As compared with cash-based transactions, increased use of “mobile transfers” and “mobile money”, which often depend upon cross-border access to cloud-based financial service platforms, allow

for enhanced transparency in public sector spending; reduced corruption and ‘off the books’ cash transactions; and increased confidence, efficiency, and predictability in the banking system. Access to cross-border technologies also allows for data analytics that are better able to identify potential cases involving money laundering, terrorist financing or other criminal financial transactions. In these ways, cross-border data transfers enhance financial legal compliance and improve the ability of financial regulators to identify and respond to emergent criminal activity or other risks.

The Costs of Data Transfer Restrictions and Data Localization Mandates

The unintended economic consequences of unreasonable data transfer restrictions and data localization mandates must not be underestimated. Such measures have consequences in terms of jobs, exports, and investment. For both local enterprises and foreign-invested enterprises, such measures disrupt operations; raise the costs and challenges of providing services and manufacturing goods; and make it harder to invest and keep local workers employed. Among other things, such measures effectively deprive end-users of advanced services and put them at a competitive disadvantage compared with companies in other countries. We elaborate on each of these points below.

First, data localization mandates and unreasonable data transfer restrictions are **particularly damaging to local industries, including agriculture, logistics, and manufacturing (e.g., textiles)**. In fact, it has been estimated that 75% of the value of data transfers accrues to traditional industries.⁷ Data transfers enable MSMEs to connect and find prospective customers in overseas export markets. MSMEs and other firms also rely on data flows to increase their productivity, drive quality, and improve output in other ways. Companies depend upon the ability to integrate software and other emerging technologies at every stage of the production and value chain. Data-enabled software innovations are connecting suppliers, manufacturers, and service providers around the world, while accelerating efficiencies relating to product design, engineering, production, logistics, marketing, and servicing. Cross-border data transfer restrictions impede the ability to realize these efficiencies.

Second, data localization mandates and unreasonable data transfer restrictions **raise the costs of international trade**. Data transfers are critical to reducing the costs to local firms of exporting to other markets. One recent study estimates that digital tools helped MSMEs across Asia reduce export costs by 82% and transaction times by 29%.⁸ Likewise, electronic commerce platforms, which operate on the basis of cross-border data transfers, are estimated to reduce the cost to local firms of distance in trade by 60%.⁹ When countries impose unreasonable data transfer restrictions and data localization mandates, they prejudice their local industries’ ability to realize these significant welfare-enhancing benefits and efficiencies.

Third, data localization mandates and unreasonable data transfer restrictions **hurt local innovation and competitiveness**. A country that limits cross-border data transfers limits its own industries’ access to technologies and data sources that are critical to growth and innovation, business operations, and the transfer of technology. These include: (a) productivity-enhancing software solutions; (b) scientific, research, and other publications; and (c) manufacturing data,

blueprints, and other operational information. Faced with higher software costs and an unpredictable environment for R&D investments, local industries face challenges keeping technological pace with foreign competitors — threatening both domestic and export market sales. Furthermore, as data restrictions place an undue burden on industries operating in countries imposing them, they also undermine those countries' attractiveness as a destination for investment and R&D.

Fourth, data localization mandates and unreasonable data transfer restrictions **undermine access to tailored data-enhanced analytics and insights that can help address economic and societal challenges**. A country that limits cross-border data transfers also may exclude itself from the development of data analytics and AI-driven technology solutions that can help address economic and other challenges. Local industries and economies can face competitive harm if they are deprived of the insights that come from consolidating local data sets within larger regional or global data sets for purposes of data analysis.

In the foregoing ways, data localization mandates and data transfer restrictions harm local MSMEs and other local enterprises.

¹ See <https://ca.go.ke/wp-content/uploads/2019/05/Kenyas-Digital-Economy-Blueprint.pdf>

² USAID, US Global Development Lab website, available at: <https://www.usaid.gov/digital-development/digital-finance>

³ *Alternative Lending in Mexico* <https://lending-times.com/2018/02/08/alternative-lending-in-mexico/>

⁴ <https://www.worldbank.org/en/news/press-release/2019/04/08/record-high-remittances-sent-globally-in-2018>.

⁵ <https://blogs.worldbank.org/psd/paying-across-borders-can-distributed-ledgers-bring-us-closer-together>

⁶ Innovative technologies based on data are important to enhance the accuracy of credit scoring for MSME's, which employ a large percentage of the population worldwide and help fuel the global economy. For example, Tradeteq, a smart technology trade finance platform, uses a credit model based on artificial intelligence that goes beyond financial information, and includes socio-economic, geographical and other information about the company, that are used to base finance investment decisions. The algorithms used to power this tool also rely on a large amount of data collected, processed, and analyzed in various parts of the world. Tradeteq, the AI-driven trade finance investment platform, available at https://www.finyear.com/Tradeteq-the-AI-driven-trade-finance-investment-platform_a40656.html

⁷ See Global Data Alliance, *Cross-Border Data Transfer – Facts and Figures* (May 2020), at : <https://globaldataalliance.org/downloads/gdafactsandfigures.pdf>

⁸ *Micro-Revolution: The New Stakeholders of Trade in APAC*, Alphabet, 2019.

⁹ Concept Note, p. 30.