

FIDA needs Artificial Intelligence – but not as a technology

Why relevance, not regulation, determines value creation

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The Financial Data Access-Regulation of the European Union (FIDA) is a regulatory necessity – but it is not a strategy! By standardising access to financial data, FIDA addresses a long-standing infrastructural challenge. What it does not do is create value. As data access becomes regulated and uniform, the strategic bottleneck shifts decisively from availability to relevance.

REGULATION OPENS DATA SPACES. RELEVANCE IS CREATED THROUGH DESIGN.

This paper argues that under FIDA, artificial intelligence is not a supporting technology, but the decisive strategic value layer. It determines which data is meaningful in a given situation, how relevant services for end customers emerge from it, and whether data usage is economically viable. Without this capability, FIDA remains operationally correct – but strategically ineffective.

This paper does not offer checklists or best practices. It articulates a position: those who want to use FIDA strategically must decide whether they merely manage data – or actively design relevance.

FIDA addresses access – not impact

FIDA establishes, for the first time, a binding framework for cross-sector access to financial data. This opening is necessary: it breaks down historical silos and standardises how financial data can be accessed and shared. At the same time, it removes a central source of differentiation: exclusive control over information.

FIDA CREATES ACCESS TO DATA – NOT ACCESS TO VALUE CREATION.

Competition therefore shifts. APIs, interfaces and data standards become mandatory rather than optional. Institutions that focus primarily on regulatory compliance meet minimum requirements, but they do not gain strategic relevance. FIDA defines how data must be shared. The decisive question of how value is created from data remains unanswered.

This gap is not an unintended side effect of regulation. It is its logical consequence. The more open and standardised the data space becomes, the less value is created automatically. Value creation becomes a matter of deliberate design.

The dominant response to increasing data availability is well known: more analytics, better models and higher degrees of automation – often condensed into the narrative that “data is the new oil”. Under FIDA, this reflex frequently exacerbates the problem. It increases data density, complexity and interaction frequency without necessarily improving orientation or usefulness.

WHERE DATA IS ABUNDANT, RELEVANCE BECOMES SCARCE.

Relevance does not arise from data volume, but from context. It requires information to be interpreted situationally, prioritised and, in many cases, consciously not used. This capability is largely absent from prevailing Open Finance and AI narratives, which optimise processing efficiency rather than meaning.

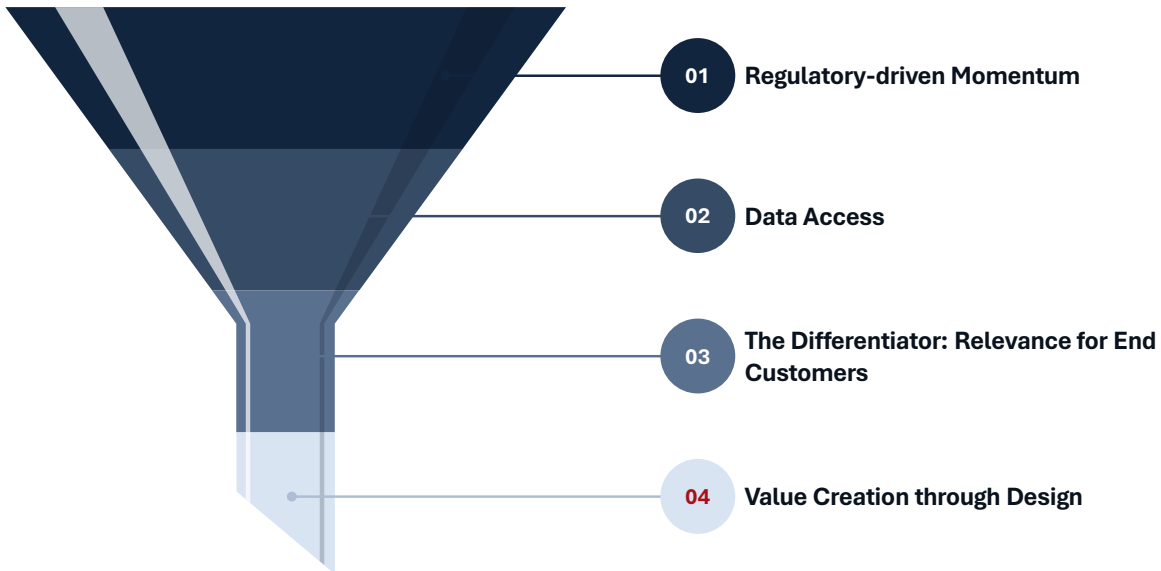


Figure 1 - From Data Access to Relevance

Under FIDA, relevance becomes the scarce resource. Organisations that cannot create it systematically become interchangeable, regardless of how much data they can technically access.

Artificial Intelligence and implementation of FIDA

AI as a context engine – from information to meaning

The strategic role of AI begins where traditional data processing reaches its limits. As a context engine, AI does not generate additional information; it creates situational decision context. It combines data from different sources and identifies patterns that point to concrete life events or decision situations.

IT IS NOT ACCESS TO DATA THAT MATTERS, BUT THE ABILITY TO CREATE MEANING.

The decisive distinction lies in prioritisation. A context engine does not aim for completeness, but for impact. It weights information according to situational relevance and filters out what is available but immaterial. Under FIDA, the ability to deliberately trigger nothing becomes a defining quality of effective digital services.

This fundamentally changes service quality. Interactions become fewer, but more meaningful. Orientation replaces information overload. For data users – and particularly for Financial Information Service Providers (FISPs) – the context engine becomes the upstream control layer for all subsequent services. Without it, data access remains a raw material without form.

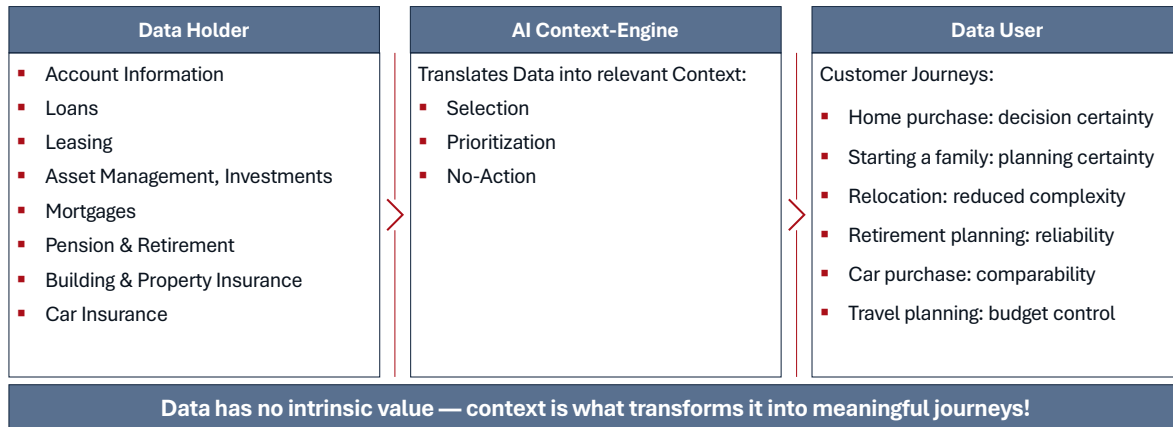


Figure 2 - How Data turns into Value

AI as a service designer – from products to adaptive services

Context alone does not create value. Value emerges only when context is translated into services. This is precisely where traditional product-centric thinking reaches its structural limits under FIDA. Predefined services assume stable usage patterns and follow a logic of upfront specification, development and scale. Cross-sector data access increasingly renders this logic obsolete.

Under these conditions, AI assumes the role of a service designer. Services no longer emerge exclusively at the point of conception, but continuously during operation. Based on the situational understanding provided by the context engine, service components are dynamically combined, adapted or deliberately withheld. Design becomes an ongoing process aligned with real behaviour rather than assumed needs.

UNDER FIDA, DIFFERENTIATION DOES NOT ARISE FROM PRODUCTS, BUT FROM SERVICE DESIGN.

The key shift lies in the timing of design. While classical service models attempt to anticipate as many scenarios as possible in advance, AI-based service design accepts uncertainty as the normal state. Services are structured as modular arrangements whose composition is determined situationally. Value does not arise from the number of features, but from their appropriateness in a given moment.

This logic also transforms service ownership. Decisions about service logic move from the design phase into live operation. Humans define guardrails – strategic objectives, quality criteria and economic boundaries – within which AI continuously adapts services. Service

design becomes a steering discipline rather than a planning exercise. Success is no longer measured by feature roadmaps, but by impact.

Traditional Product and Service Design	AI-based Service Design
<ul style="list-style-type: none"> ▪ Services are defined upfront ▪ Focus on product logic ▪ Anticipation of usage scenarios ▪ Feature roadmaps ▪ Scaling through standardization ▪ Humans design services 	<ul style="list-style-type: none"> ▪ Services emerge during operation ▪ Focus on situational context ▪ Adaptation to real-world usage ▪ Outcome-oriented steering ▪ Scaling through adaptability ▪ Humans set guardrails, AI designs
<p>The more open the data space, the less viable traditional product thinking becomes</p>	

Figure 3 - Traditional Product Thinking vs. AI-based Service Design

For data users, and especially for FISPs, this capability is strategically decisive. Since all market participants under FIDA access comparable data, differentiation arises exclusively from how services are designed and orchestrated. AI enables fundamentally different service experiences to be created from identical data – depending on context, timing and intent. In an open data space, this capability becomes the central source of competitive advantage.

AI as an economic filter – from usage to value creation

FIDA makes data usage legally possible, but not automatically economically sensible. The easier access becomes, the greater the temptation to use data simply because it is available. Costs, complexity and benefits quickly drift out of balance.

NOT EVERY POSSIBLE USE OF DATA CREATES ECONOMIC VALUE.

AI acts here as an economic filter. It does not assess data usage once, but continuously during operation. Which data source actually contributes to value creation in a given situation? Which usage generates effort without impact? Economic viability is steered situationally, not assumed by default.

For FISPs, this capability is a prerequisite for scalability. Without economic filtering, costs grow in proportion to data volume while margins stagnate. With it, the foundation for sustainable monetisation in an open ecosystem is established.

Strategic implications: roles are decided now

With FIDA, data access becomes a commodity. Established data holders and emerging data users alike face a clear strategic choice: limit themselves to functional compliance and the role of data provider or establish AI as a strategic value layer and actively shape services and journeys.

**THOSE WHO DO NOT DESIGN RELEVANCE BECOME SUPPLIERS OF SOMEONE ELSE'S
VALUE CREATION.**

This value layer cannot be fully outsourced. Context logic, service design and economic steering define an organisation’s position in the ecosystem. Those who relinquish control over these capabilities hand differentiation and value capture to others.

FIDA lays the tracks. AI determines who designs what runs on them – not as a technology, but as the mechanism that steers relevance, services and economic outcomes.

Summary

Much of the current discourse around FIDA and AI follows familiar patterns. This paper deliberately does not. The comparison below clarifies where and why it takes a different stance.

Common assumptions	Position of this paper
More data leads to better services	More data increases the need for selection
AI optimises existing processes	AI determines relevance, not efficiency
Personalisation is the key to relevance	Context outweighs personalisation
Economic viability follows from scale	Economic viability must be actively steered
Compliance is the primary success factor	Compliance is a prerequisite, not a strategy

Table 1 - Redefining the impact framework through AI

This distinction is not rhetorical. It follows directly from the logic of an open data environment under FIDA. Where access is standardised, value can only be created through deliberate design.



Stefan Schnitzler is an internationally experienced expert in payments and unified commerce. With a strong focus on the customer perspective and a proven track record as a business development leader, he has supported numerous companies across the payments ecosystem in optimizing their strategic positioning. His work consistently takes into account the entire value chain, all the way through to the needs of end customers.

