

# Data Governance to Data Enablement

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# OVERVIEW

## Introduction

- Who we are
- The team

## Our Journey from data governance to data enablement

## Q&A





# INTRODUCTION

# WHO WE

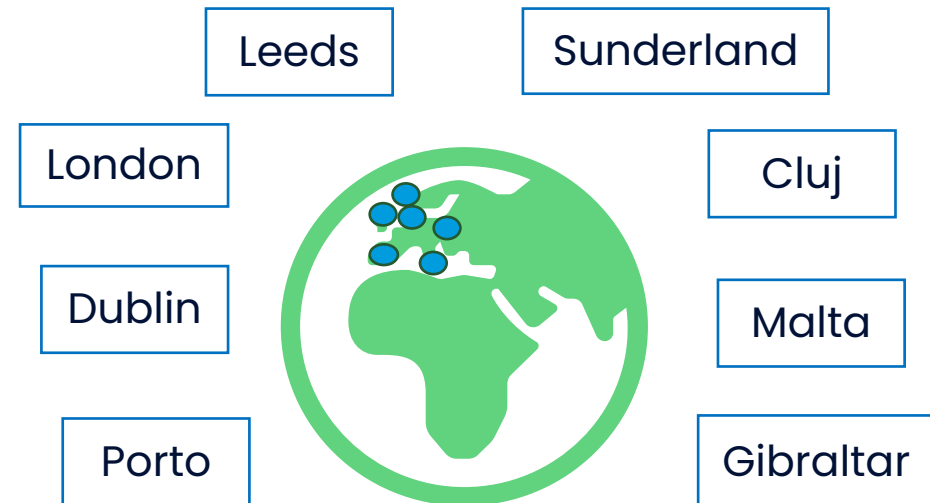
## ARE

- World leader in online sports betting and iGaming.
- One team – many brands.
- Operating in approximately 100 countries.
- 29,000+ employees.
- 13.9 million players in 2024.
- Our UK & Ireland region unites some of the biggest and best brands in the betting and gaming industry.
- Come together to drive innovation and break barriers.
- Leading in responsible gaming. Creating trusted entertainment for millions of customers every week.
- Flutter Edge – competitive advantage

### Group



### UKI

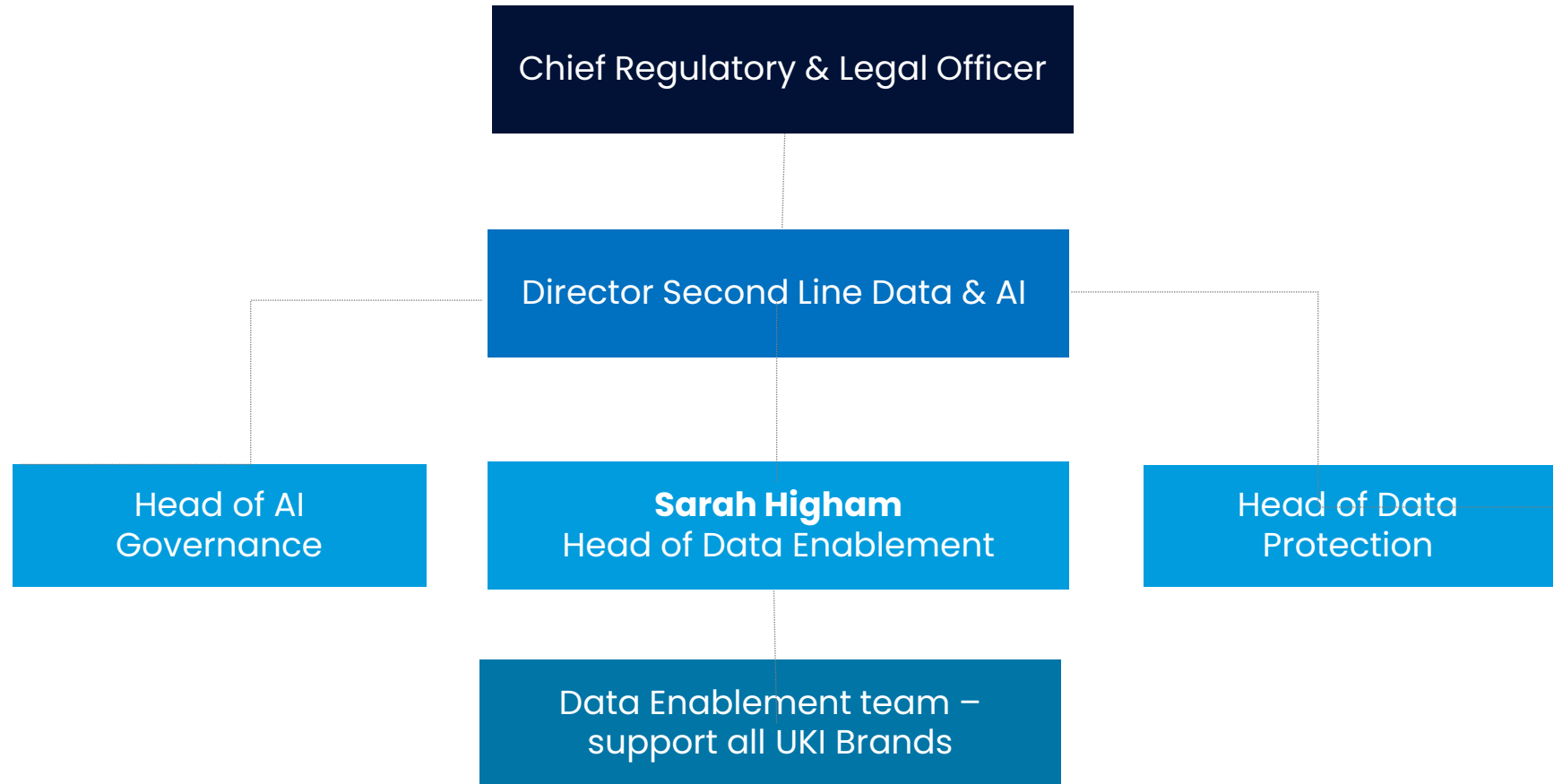


18+ GambleAware



# THE TEAM

The Data Enablement team sit in Flutter UKI's Legal team and are part of the wider second line data & AI team.



Do we need?

## VISION

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Flutter UKI to operate industry-leading, best-in-class data enablement and management that's supports the organisation achieve its business objectives.



Do we need?

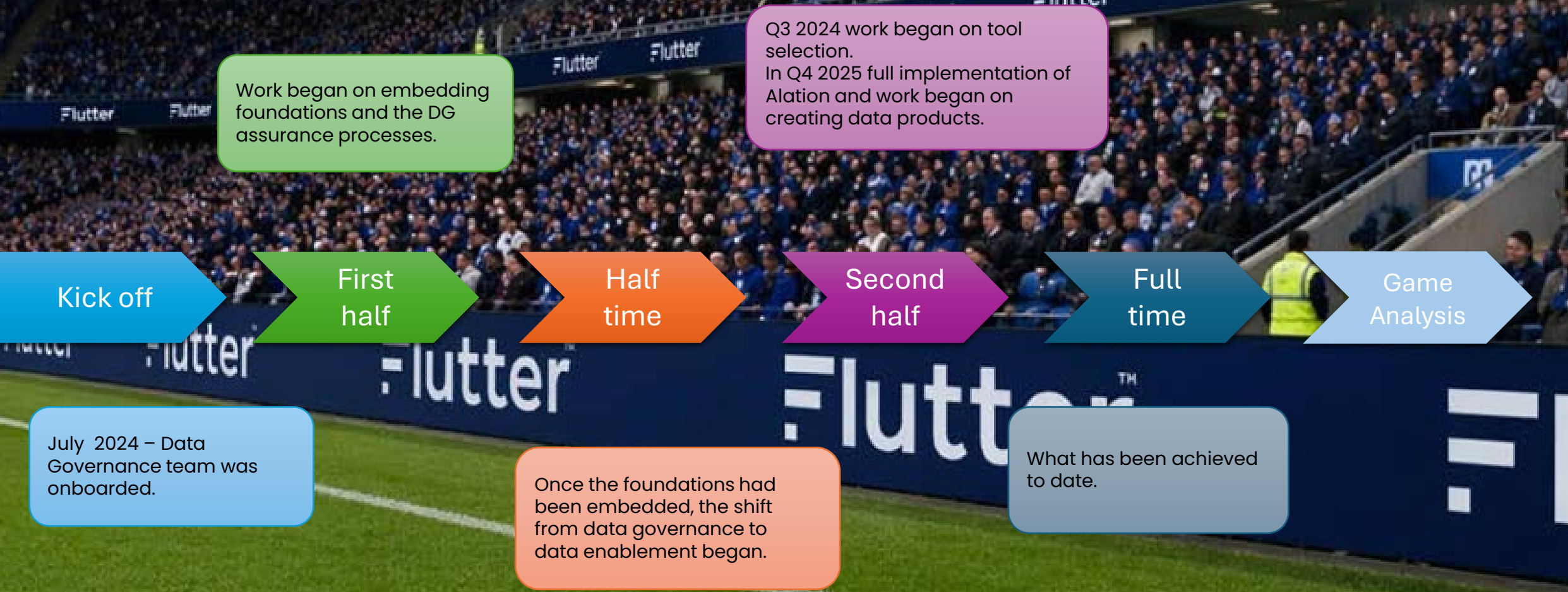
## MISSION

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To guide and enable Flutter UKI's use of data in accordance with relevant data management requirements that minimise risks of Flutter UKI being unable to meet its obligations and business objectives.



# OUR JOURNEY





# KICK OFF & FIRST HALF

# KICK OFF AND FIRST HALF



## DE FOUNDATIONS



### Data Accountability & Ownership

- Model for UKI data formalized with Data Owners, System Owners & Stewards
- Bi-Monthly Data Accountability Forum



### Data leadership & collaboration

- UKI CEO as Data Ambassador
- UKI DE Steerco w/ LT sponsors
- UKI Data Council w/ data leaders
- Flutter's Global Data & AI Communities



### Policies & Standards

- UKI DE Policy & Standards established, setting out the key requirements for data management.



### UKI DE Office

- Fully resourced
- DAMA relationship strengthened



### Flutter Edge & Global Community

- Lead voluntary global DE community
- Provide support to various parts of Flutter



### Training & Awareness & Literacy

- Annual DE training (mandatory for Data & System Owners and Stewards).



## ASSURANCE & SUPPORT



### UKI Data Maturity Assessments

Assesses UKI's maturity against the key data management requirements set out in the DE framework.

- **UKI-wide assessment.** First completed at y/e 2024, this is monitored quarterly with formal reporting of UKI-wide position. Y/e 2025 position will be reported to UKI Risk Committee in Jan 2026.
- **Quarterly remediation check-ins**, driving improvements with all Owners.



## CENTRALISED ORGANISATION OF UKI DATA



### Global RFP (Q3 2024-Q2 2025)

- UKI-led, global deal
- Business cases developed.
- Vendor demos & assessments
- Selection of Alation



### Proof of Value

- Use cases scoped
- POV performed
- Success measured & quantified



### UKI approval for full onboarding (Q3)

Subject to successful POV.



### Full integration, adoption & use (Q4 onwards)

- Customer safety end-to-end onboarding to Alation and Monte Carlo
- **Data Products** being built on 3x critical data assets
- **Tooling standards** being developed



# DATA ENABLEMENT (“DE”) FRAMEWORK: OVERVIEW

## UKI Data Enablement & Management Framework

The Flutter UKI DE Framework sets the boundaries for UKI data management, overseeing compliance and providing support in relation to those.

*The “WHY”  
Strategy.*

### Data Enablement Strategy

Vision; Mission; Strategy;

### Data Enablement Requirements

Data enablement principles:

Accountability | Responsible Use | Specific, Beneficial Purpose | Reliability | Understandability | Minimisation | Efficiency | Security

Data enablement requirements:

#### UKI-wide, neutral\* Policies & Standards

\*agnostic to any particular brand/function/dept/process/technology/data types

Data management requirements:

#### Localised\* procedures, processes & guidance

\*specific to brand/function/dept/process/technology/data types

Implemented through each stage of the data management lifecycle

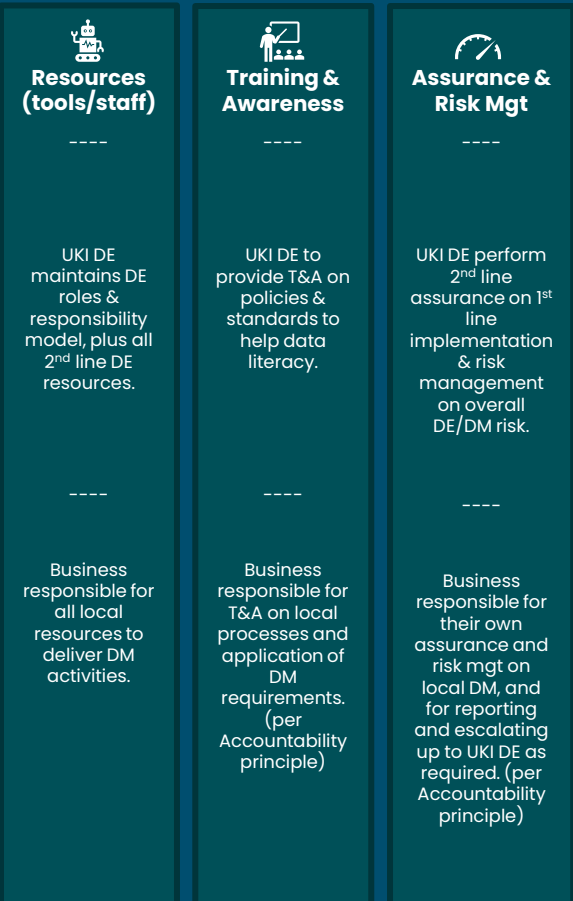
Plan & Design

Collect/Create

Use, Store, Enhance

Dispose

### Supported by:



*The “HOW”  
How will the DE and DM management strategy be achieved?*

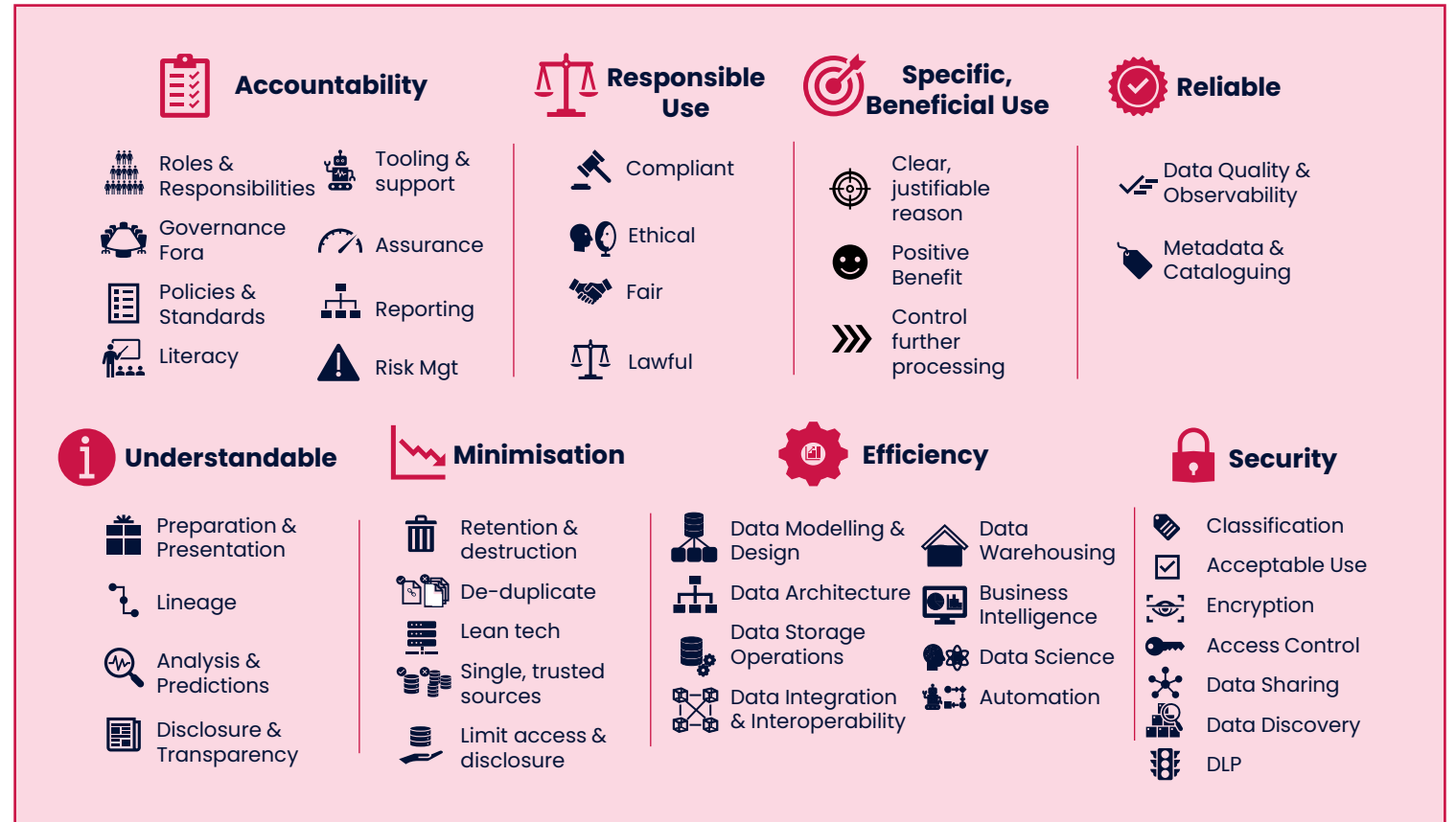
*The “WHAT”  
What needs to be implemented to deliver?  
Operational specifics and activities.*

# DATA ENABLEMENT KEY REQUIREMENTS

There are 8 overarching principles for managing and using data in Flutter UKI.

The range of requirements set out in the policies and standards, supplement each principle, facilitating practical application to the principle.

The principles, together with their application requirements, constitute a “pillar” of the UKI Data Enablement & Management Framework.



# DATA ROLES & RESPONSIBILITIES: STRUCTURE

LT

**Leadership Team**  
Ultimate accountability for data. Role by default.

CEO & MD

**1<sup>st</sup> Line of Defense**      **2<sup>nd</sup> Line**      **3<sup>rd</sup> Line**

**Ambassador(s)**  
Champions DE and helps align DE, Data and business strategies. Role by nomination.

Functions  
(Director)

**DATA ENABLEMENT & OVERSIGHT**

**DATA MANAGEMENT EXECUTION**

Departments  
(Heads of Department)

**Function Owners**  
Accountable for Function's data strategy, compliance & risks. Role by default.

**Data Owners**  
Accountable for data used within your dept/business unit to fulfil a business purpose. Role by default.

**System Owners**  
Accountable for **tech implementation and configuration** per Data Owner instruction. Role by default.

**Data-related Centres of Excellence**  
Accountable for specialised, technology-driven data management solutions to support the business. E.g. BI, Data Science, Data Product, InfoSec, Data Architecture, Data Engineering, etc.

Teams  
(Snr Specialists)

**Stewards**  
Responsible for delegated duties from Data Owner or System Owner. Role by nomination by Data Owners / System Owners.

All Staff

**Data Users**  
All staff are accountable for their use of data per UK&l requirements. Role by default.

**Rules/policies** apply to all DataMgt. DE Office create UKI-wide / 1<sup>st</sup> line create local rules.

**Assurance & Risk** Evidence from 1<sup>st</sup> line, oversight by DE Office.

**DE forums** Governance on key Data matters

**Training & awareness** DE Office deliver UKI-wide / 1<sup>st</sup> line deliver local.

Upstream assurance & reporting via CRLC & committees

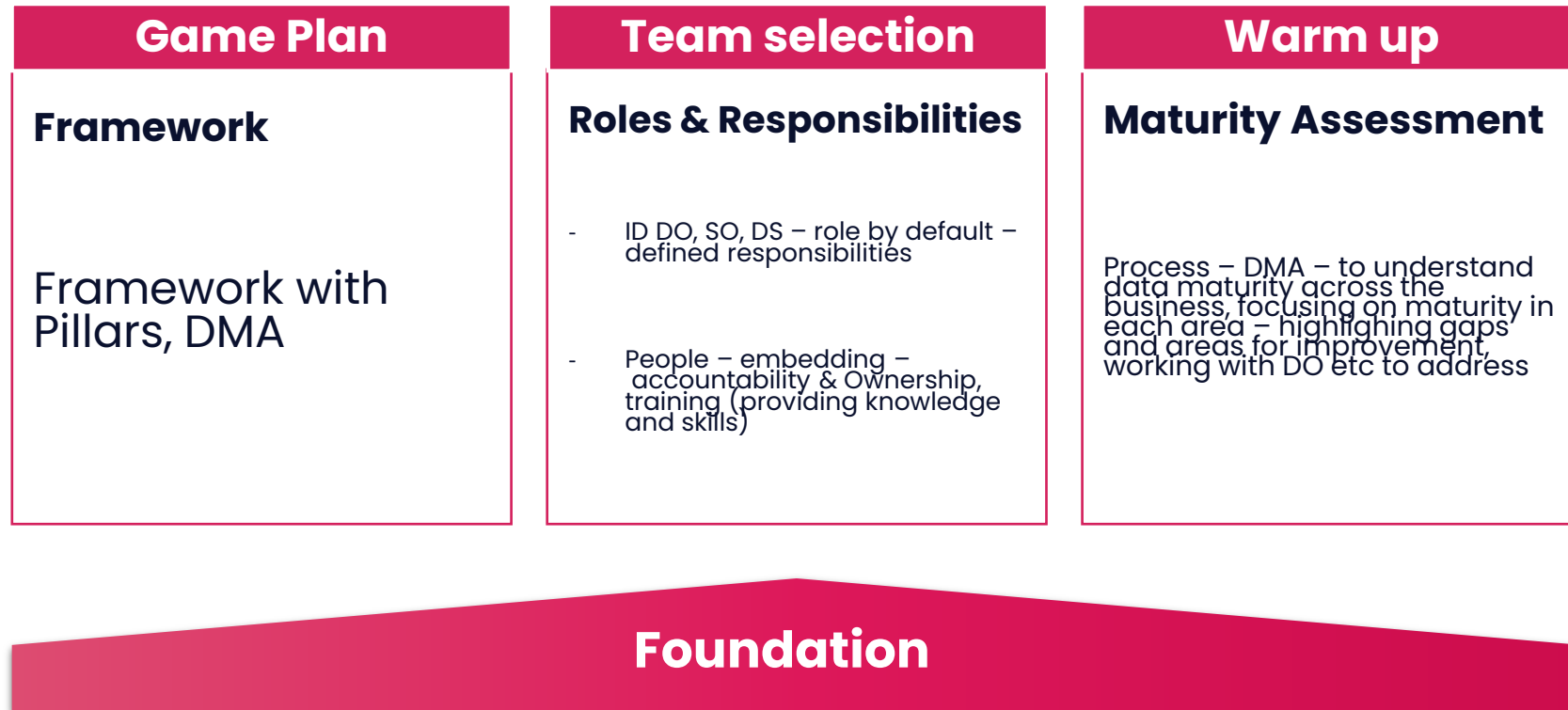
**UKI DE Office**  
Accountable for DG strategy, framework, advisory, training, monitoring and assurance.

**Internal Audit**  
Provide assurance to the Board through assessment of 1<sup>st</sup> and 2<sup>nd</sup> line operations.

Assurance to Board, per IA's mandate



# KICKOFF



Tool selection

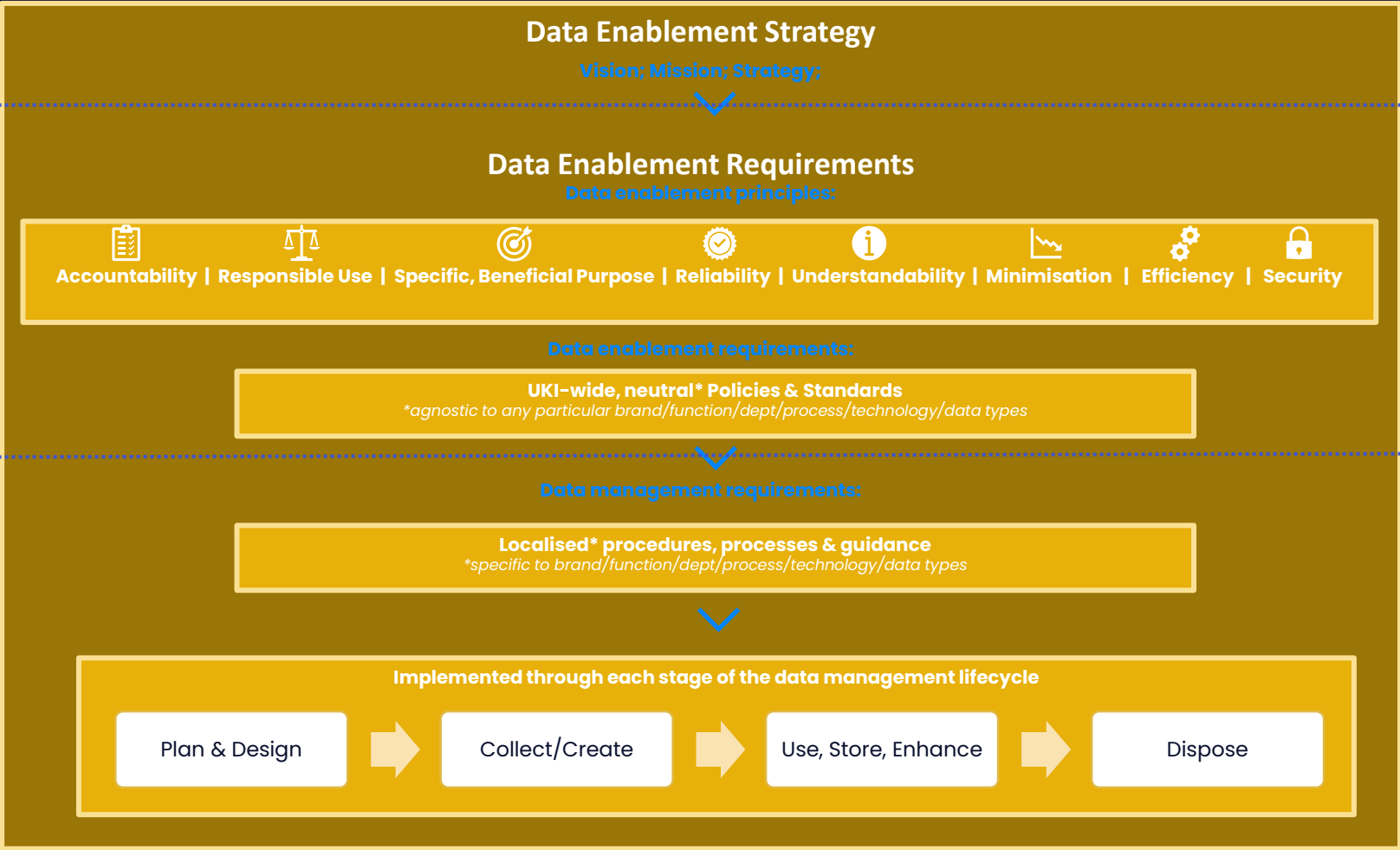
## UKI Data Enablement & Management Framework

The Flutter UKI DE Framework sets the boundaries for UKI data management, overseeing compliance and providing support in relation to those.

*The "WHY" Strategy.*

*The "HOW" How will the DE and DM management strategy be achieved?*

*The "WHAT" What needs to be implemented to deliver? Operational specifics and activities.*



**Supported by:**

Resources (tools/staff)	Training & Awareness	Assurance & Risk Mgt
UKI DE maintains DE roles & responsibility model, plus all 2 <sup>nd</sup> line DE resources.	UKI DE to provide T&A on policies & standards to help data literacy.	UKI DE perform 2 <sup>nd</sup> line assurance on 1 <sup>st</sup> line implementation & risk management on overall DE/DM risk.
Business responsible for all local resources to deliver DM activities.	Business responsible for T&A on local processes and application of DM requirements. (per Accountability principle)	Business responsible for their own assurance and risk mgt on local DM, and for reporting and escalating up to UKI DE as required. (per Accountability principle)

# DATA ENABLEMENT KEY REQUIREMENTS

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The principles, together with their application requirements, constitute a “pillar” of the UKI Data Enablement & Management Framework.

<p><b>Accountability</b></p> <ul style="list-style-type: none"> <li>Roles &amp; Responsibilities</li> <li>Governance Fora</li> <li>Policies &amp; Standards</li> <li>Literacy</li> <li>Tooling &amp; support</li> <li>Assurance</li> <li>Reporting</li> <li>Risk Mgt</li> </ul>	<p><b>Responsible Use</b></p> <ul style="list-style-type: none"> <li>Compliant</li> <li>Ethical</li> <li>Fair</li> <li>Lawful</li> </ul>	<p><b>Specific, Beneficial Use</b></p> <ul style="list-style-type: none"> <li>Clear, justifiable reason</li> <li>Positive Benefit</li> <li>Control further processing</li> </ul>	<p><b>Reliable</b></p> <ul style="list-style-type: none"> <li>Data Quality &amp; Observability</li> <li>Metadata &amp; Cataloguing</li> </ul>
<p><b>Understandable</b></p> <ul style="list-style-type: none"> <li>Preparation &amp; Presentation</li> <li>Lineage</li> <li>Analysis &amp; Predictions</li> <li>Disclosure &amp; Transparency</li> </ul>	<p><b>Minimisation</b></p> <ul style="list-style-type: none"> <li>Retention &amp; destruction</li> <li>De-duplicate</li> <li>Lean tech</li> <li>Single, trusted sources</li> <li>Limit access &amp; disclosure</li> </ul>	<p><b>Efficiency</b></p> <ul style="list-style-type: none"> <li>Data Modelling &amp; Design</li> <li>Data Architecture</li> <li>Data Storage Operations</li> <li>Data Integration &amp; Interoperability</li> <li>Data Warehousing</li> <li>Business Intelligence</li> <li>Data Science</li> <li>Automation</li> </ul>	<p><b>Security</b></p> <ul style="list-style-type: none"> <li>Classification</li> <li>Acceptable Use</li> <li>Encryption</li> <li>Access Control</li> <li>Data Sharing</li> <li>Data Discovery</li> <li>DLP</li> </ul>

# MATURITY ASSESSMENT - EXAMPLES

DE Pillar	Question Title	Question	Evidence Required
01 Governance & Accountability	Data Roles & Responsibilities > Accountable Owners	My department (1) understands the UKI Data Roles & Responsibilities (as set out in the UKI DE Policy & Policy Standards) and (2) has nominated all required Stewards to the DE Office.	Please confirm your nominated Data Steward(s) for your area.
01 Governance & Accountability	Policies & Record Keeping > Policies & procedures (localised)	My department has documented procedures and practices for data governance and management.	Please provide links to the documentation.
02 Responsible use of Data	Identify & communicate compliance requirements	My department identifies and understands all compliance requirements that apply to its Data usage and communicates these requirements to the Staff that use the Data.	Please provide details, together with links to evidence where applicable."
03 Specific, Beneficial Purpose	Identify purpose	My department only collects, creates or uses Data where the Data is necessary for a specific purpose that provides benefit to the business and/or its' stakeholders.	Please provide details, including any concerns you may have of Data being processed without justifiable and beneficial reason.
04 Reliability	DQ > DQ standards	My department works with Data and System Owners to establish and maintain data quality standards, ensuring that controls are in place across each stage of the Data Lifecycle.	Please provide details of data quality standards and controls in place to the Data used, together with links to the documentation.
05 Understandability	Data mapping	My department's end-to-end Data Lifecycles have been illustrated or mapped in the form of diagrams or otherwise, explaining how data is collected, used, stored, and retained.	Please provide links to, or copies of, data maps.
06 Minimisation	Data Minimisation by design	My department incorporates data minimisation into the design of all processes and activities.	Please provide details, together with any evidence (e.g. link and/or copy of policy), of how this is implemented.
07 Efficiency	Process Automation	My department uses automation, machine learning or AI technology to process Data more efficiently.	Please provide details of automation, machine learning and/or AI used, together with links and/or documentation where possible.
08 Security	Data Classification	My department has classified all Data we use in our department in accordance with the UKI InfoSec security classification tiering.	Please provide evidence (links or copies of documentation) of applied classification to Data.

01: Governance & Accountability
DO_01_01: Accountable Owners
DO_01_02: Local Data Forums
DO_01_03: Local Data Governance
DO_01_04: Reporting
DO_01_05: Policies & procedures
DO_01_06: Data Controls
DO_01_07: localised T&A
DO_01_08: Data Risk Management
DO_01_09: Single Risk Management
DO_01_10: Tooling
02: Responsible use of Data
DO_02_01: Compliance
DO_02_02: Ethics and fair use
DO_02_03: Lawful Basis
DO_02_04: Sensitive Personal data
DO_02_05: Marketing
DO_02_06: Online Tracking
DO_02_07: Data subject rights
DO_02_08: DP by design & default
DO_02_09: Personal data breaches

03: Specific, Beneficial Purpose
DO_03_01: Identify purpose
DO_03_02: Document purpose
DO_03_03: Usage per purpose
04: Reliability
DO_04_01: DQ Standards
DO_04_02: DQ Tools & Tech
DO_04_03: UKI Business Glossary
DO_04_05: UKI Directories
DO_04_06: Master Data
DO_04_07: Reference data
05: Understandability
DO_05_01: ROPA Documentation
DO_05_02: Data mapping
DO_05_03: Business Intelligence
DO_05_04: Data Science
DO_05_05: Disclosure Obligations
DO_05_06: Transparency Obligations

06: Minimisation
DO_06_01: Minimisation by design
DO_06_02: Limit access to data
DO_06_03: Limit sharing of data
DO_06_04: Retention requirements
07: Efficiency
DO_07_01: Process Automation
08: Security
DO_08_01: Data classification
DO_08_02: Acceptable use
DO_08_03: Encryption
DO_08_04: Access control
DO_08_05: Security incidents
DO_08_06: Risk management
DO_08_07: Data sharing
DO_08_08: Card Data requirements

DATA MATURITY SUMMARY			
Data Governance Pillar / Category	Total Available Score	Total Assessed Score	Maturity Score as %
01 Governance & Accountability	55	20	36%
02 Responsible use of Data	15	0	0%
03 Specific, Beneficial Purpose	15	0	0%
04 Reliability	30	12	40%
05 Understandability	25	1	4%
06 Minimisation	20	0	0%
07 Efficiency	5	0	0%
08 Security	40	4	10%
TOTAL	205	37	18%

DATA PROTECTION MATURITY SUMMARY			
Data Protection Pillar / Category	Total Available Score	Total Assessed Score	Maturity Score as %
01 Governance & Accountability	30	10	33%
02 Data Processing	70	4	6%
03 Transparency	5	0	0%
04 Data Subject Rights	5	0	0%
05 Data Protection by Design & Default	5	0	0%
06 Data Sharing	10	0	0%
07 Security	40	4	10%
08 Personal Data Breaches	5	0	0%
09 Risk & DPIAs	10	1	10%
TOTAL	180	19	11%



# HALF TIME

REVIEW TACTICS - SHIFT TO DATA

ENABLEMENT

# Why Data Enablement



Data-driven enablement for **defensive** and **offensive** business needs.

## DEFENSIVE

*Protecting our organisation and customers*

TECH

**Security:** Data classification across the estate.

PRODUCT

**Data products:** Prioritising DE and DQ across our **critical data products** & publish within the **Alation Marketplace**.

TECH + PRODUCT

BI

LRC

**Compliance:** Data quality to **prevent LCCP fines**  
DP governance to **avoid GDPR fines**.

## OFFENSIVE

*Utilising data for strategic growth*

**Cost optimisation (tech):** Reduce tech debt by identifying stale data and aiding decommission

**Change/project accelerations:** More efficient and accurate **data migration**

**AI-led Innovation:** Data-centric AI governance enabling **confident scaling of AI** capabilities.

**Cost optimisation (time):** Reduce time wasted on data tasks e.g. 25-50% of BI time

**Innovation: Self-serve capabilities** for data-led innovation

- Still rely upon the relevant business input and ownership of delivery.
- DE provides the foundations that facilitate that delivery, and future delivery.
- Without DE, data will remain poorly managed and none of the above can be achieved in a sustainable, efficient manner – instead we will continue to rely on manual, time-intensive, isolated and reactive solutions that provide little to no strategic value.

# Data Product led approach

## BUSINESS DECISIONS & OUTCOMES

Business decisions dictate the critical data identification and the prioritisation of data product builds

Trusted data\*, via data products, used to enable business decisions and delivery

**\*AI Enablement?**  
Trusted data *IS* AI-ready data.  
This approach truly enables AI.

### CONSUMPTION TO ENABLE BUSINESS DECISIONS

<b>Business Intelligence &amp; Analysis</b>	<b>ALATION'S "CHAT WITH DATA" AI LAYER</b>	<b>SHOP FOR DATA (USER SELF-SERVE) IN ALATION</b> Discover, understand, request access, query the data
<b>INTERNAL GENAI QUERY AGENTS (e.g. FLINT)</b>	<b>ALATION AGENTS (Builder, SDK, MCP templates)</b>	

**DATA PRODUCT MARKETPLACE**  
*Published data products for human and AI consumption*

**Alation-based Data Product components**

*Unified business & tech view of data assets*

<b>Reliability &amp; Understandability</b>	Data Quality & Observability	Lineage	Metadata & Cataloguing
<b>Ownership &amp; Accountability</b>	Data & System Owners (+ Stewards)	Data Product Owners	Data COE support
<b>Responsible, Beneficial &amp; Secure Use</b>	Classification Access control	Compliance	Retention & destruction

**Components at native system level**

<b>Data Mgt Fundamentals</b>	Data Models, Design & Architecture	Data Integration, Interoperability & Engineering	Data Science
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### SUPPORTED BY:

- Leadership & Collaboration Forums**  
**Steerco** (strategic direction; business decisions)  
**Data Council** (Data org/COE collaboration & delivery)  
**Data Accountability forum** (bbi-monthly for Owners & Stewards)  
**Individual Workshops** (w/ Owners, Stewards, Data etc)
- Tooling**  
**ALATION** (data intelligence, catalogue, product marketplace)  
**MONTE CARLO** (Data quality & observability)
- Training & Literacy**
- DE Office support**
- Policies & Standards**
- Assurance**
- Reporting**
- Risk Mgt**

The **UKI Data Enablement Framework** sets all the requirements and structures for all layers of data management and the data product ways of working, all set up to enable the business to meet its objectives.

It covers everything, bar the business decisions.



# SECOND HALF

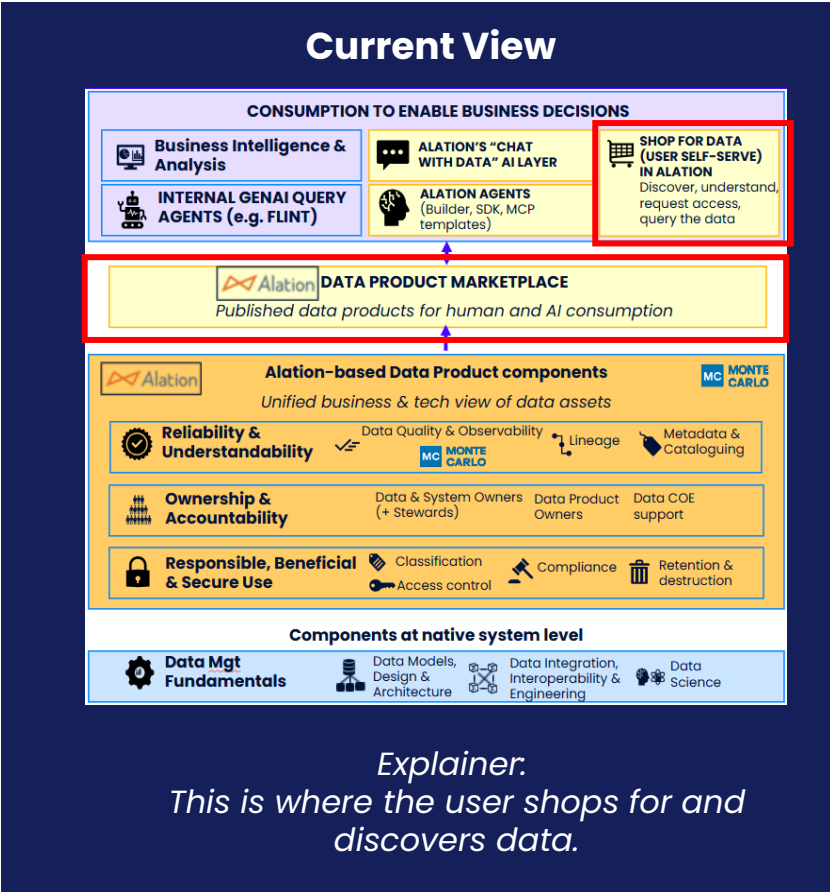
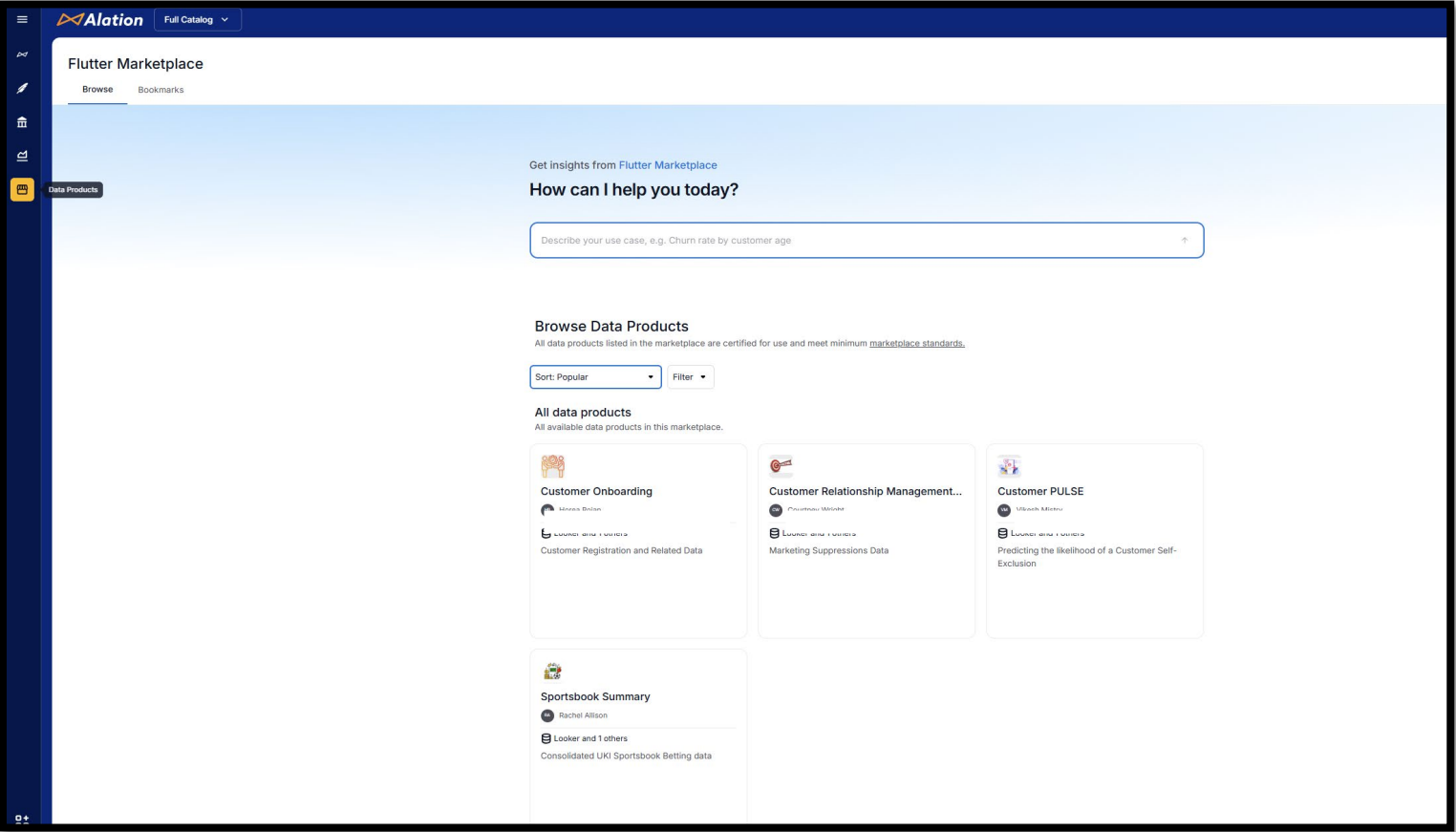
## ENABLING A DATA PRODUCT LED APPROACH

The screenshot displays the Alation user interface. At the top left, the Alation logo and a 'Full Catalog' dropdown menu are visible. The top right corner contains a 'Switch to Classic Experience' button, a settings gear, a mail icon, a help icon, and a user profile icon labeled 'N'. A dark blue sidebar on the left contains a 'Catalog' section with various navigation items: My Bookmarks, Recently Visited, My Chats, Domains, Data Sources, Business Intelligence, Glossaries: Terms, Metrics..., ROPA, Standards & Guides, AI Inventory, ML Models, Data Contracts, Data Enablement Docume..., Data Quality Rules, Policies, Data Consumptions, and Queries. Below these are 'NOT CONFIGURED' items: File Systems and ELT Sources, each with a 'Configure' button. A 'Where are Articles?' link is also present. The main content area features a large blue header with the 'Flutter' logo and a search bar labeled 'Search Alation'. Below the header is a row of partner logos: PADDYPOWER., betfair, tombola., POKERSTARS, and sky betting & gaming. The 'Policies & Guides' section follows, containing icons and titles for: Data Protection Policies and Gu..., Data Enablement Policies & Gui..., Security Policies & Guide, AI Governance & Responsible A..., Anti-Money Laundering Policie..., Compliance Policies & Guides, and Marketing Compliance. At the bottom, there are sections for 'Bookmarks' and 'Recently visited'.

# Marketplace

**Alation Marketplace** is a centralized hub for discovering and managing data products. It allows users to browse, search, and interact with various data products. There is also the ability to **chat with the data** using the Alation or other AI technologies.

Below you can see 4 **data products** available within the Alation Data Product Marketplace. Data products can also have **badges** to further categorize them. (Example: Brand, status, data classification type, domain etc)



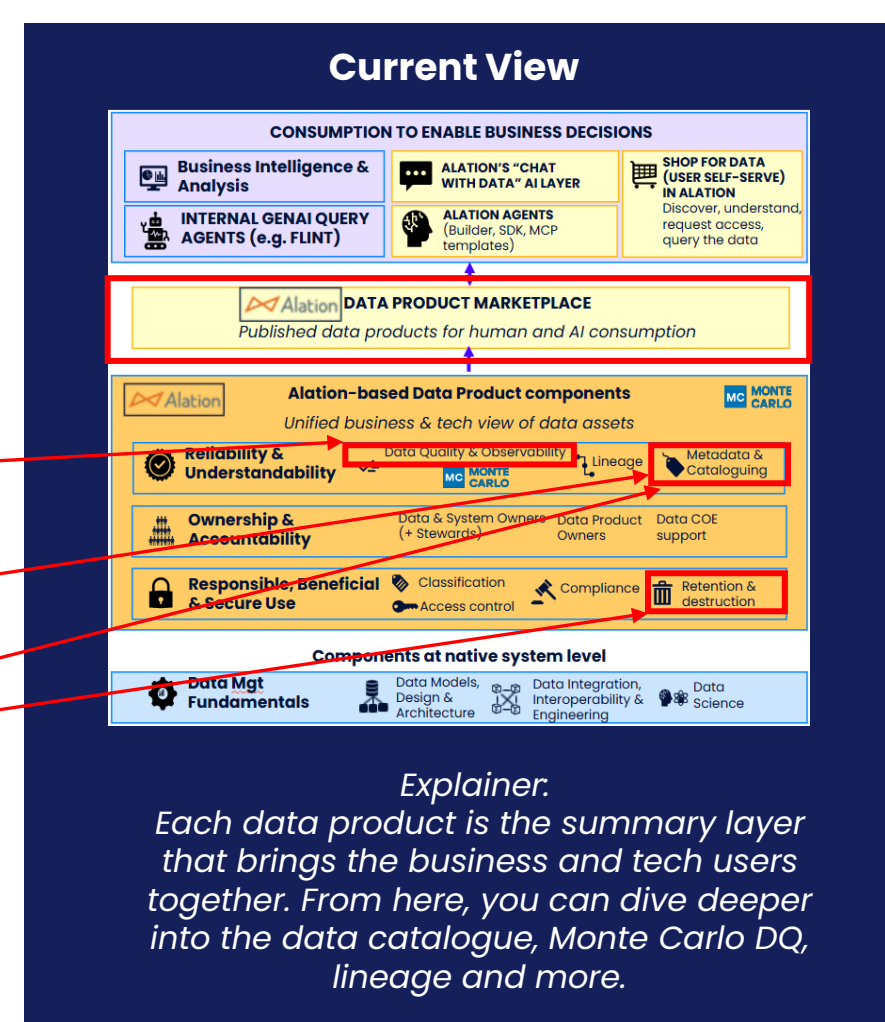
*Explainer:  
This is where the user shops for and discovers data.*

# Marketplace > Data Product

Each data product has a full overview of all the **business context** required to fully understand what the data product provides and it is a central location for Data Product Owner to manage the governance around their data products. Users can request **access**, ask **questions**, **rate** and **report a problem** with the data product. Within the data products there is a link to the **Data Quality** dashboard to understand the overall quality prior to using, the **recent changes** and **up and coming** changes.

The screenshot shows the Alation interface for a data product titled "Customer Relationship Management (CRM) Suppressions". The page is divided into several sections:

- Data Freshness & Quality:** Lists maintenance tasks such as "SCV suppression and preference data" and "Facebook RG exclusion lists". A red arrow points to a link for "Data Quality Dashboard for this product" with the annotation "DQ dashboard in MC DQ rules (business context)".
- Recent Changes:** Lists updates like "Looker - Add self\_exclusion\_exchange" and "New columns added to omni\_crm\_vw\_crm\_suppressions". A red arrow points to the "Curation (Business context)" annotation.
- Future Enhancements / Roadmap:** Includes "Project Chorus" details.
- Useful Links:** Contains links for "Process document" and "GDPR Data Retention Process and Rules". A red arrow points to the latter with the annotation "Applicable retention".
- Data assets:** A section for exploring data assets, with a red arrow pointing to the "Data assets, which can be explored further via the Data Catalogue" annotation.
- Right-hand Panel:** Includes "User Ratings" (with a "Did you find this data product helpful?" prompt), "Data contract" (showing "Schema checks" as "Passed"), and "Data quality score" (displaying a 99% "Excellent" score).

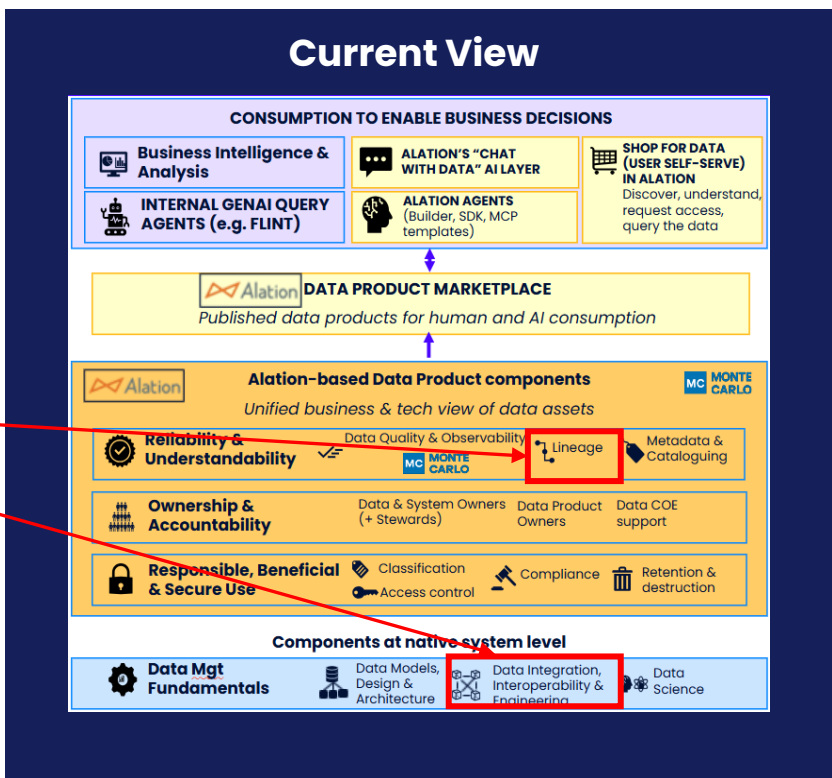


*Explainer:*  
Each data product is the summary layer that brings the business and tech users together. From here, you can dive deeper into the data catalogue, Monte Carlo DQ, lineage and more.

# Data Catalog > Data Asset (Lineage)

The screenshot shows the Alation Data Catalog interface for the data asset 'vw\_crm\_suppressions'. The breadcrumb path is 'Redshift Producer (edcrscprod) > edcrsdbprod.omni\_crm > vw\_crm\_suppressions'. The 'Lineage' tab is selected, showing a lineage chart with a central node 'vw\_crm\_suppressions' and various upstream and downstream nodes. A red arrow points from the 'Lineage' tab to the 'Lineage Chart' section. Below the chart, there is a text box: 'Click on a node in the graph to see detailed info.' with a diagram showing a node being clicked. At the bottom right, the page number '26' is visible.

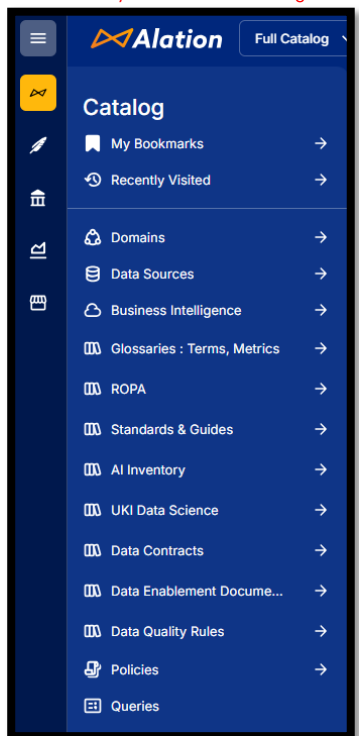
Assists Data Engineering with impact analysis and incident management.



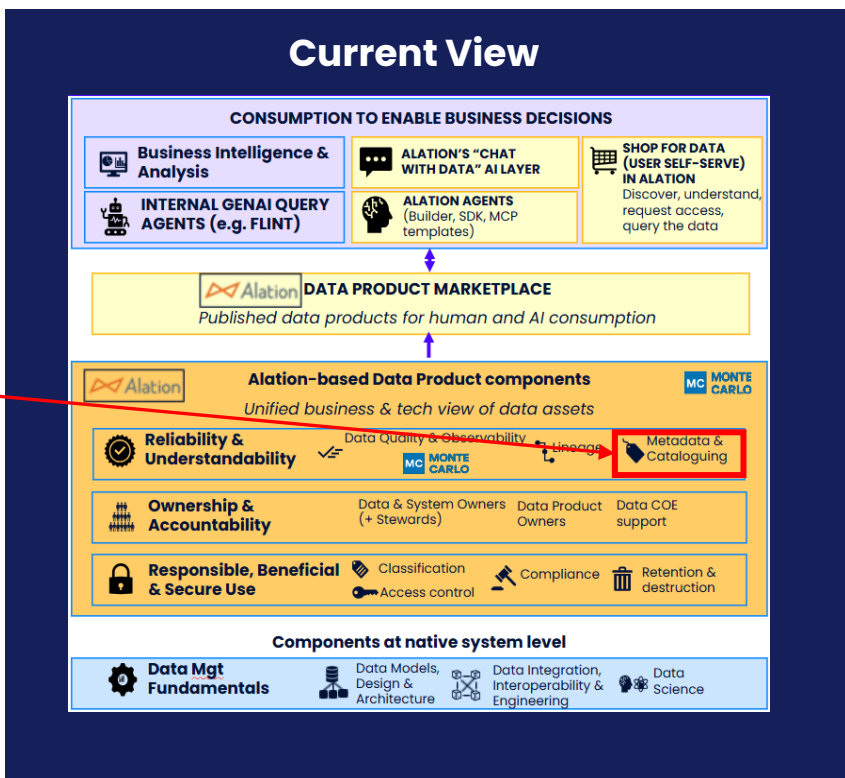
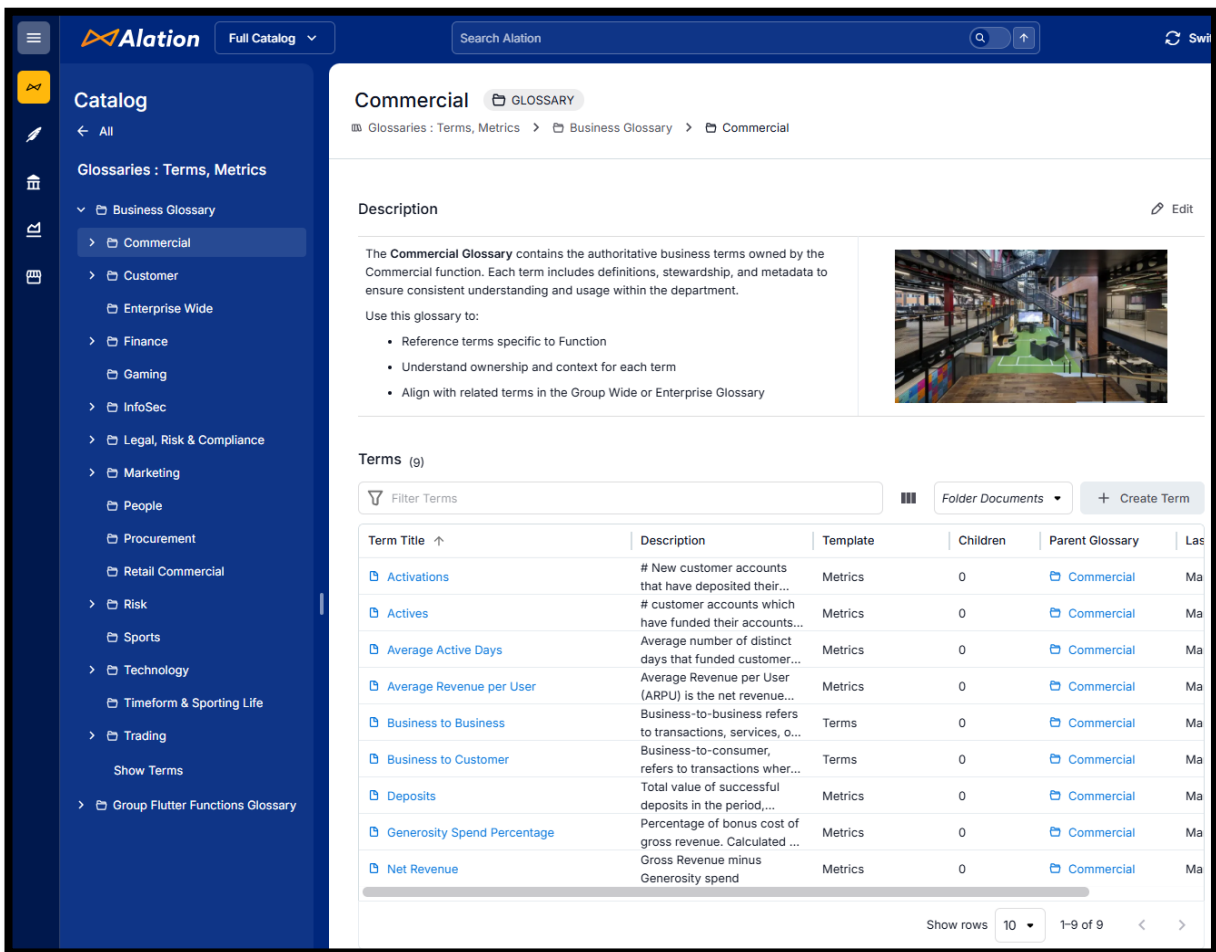
# Business Glossary

The business glossary includes both terms and metrics. All the Stewards across each department have been tasked with updating the glossary for their department and to keep it maintained.

Entirely customisable catalogue

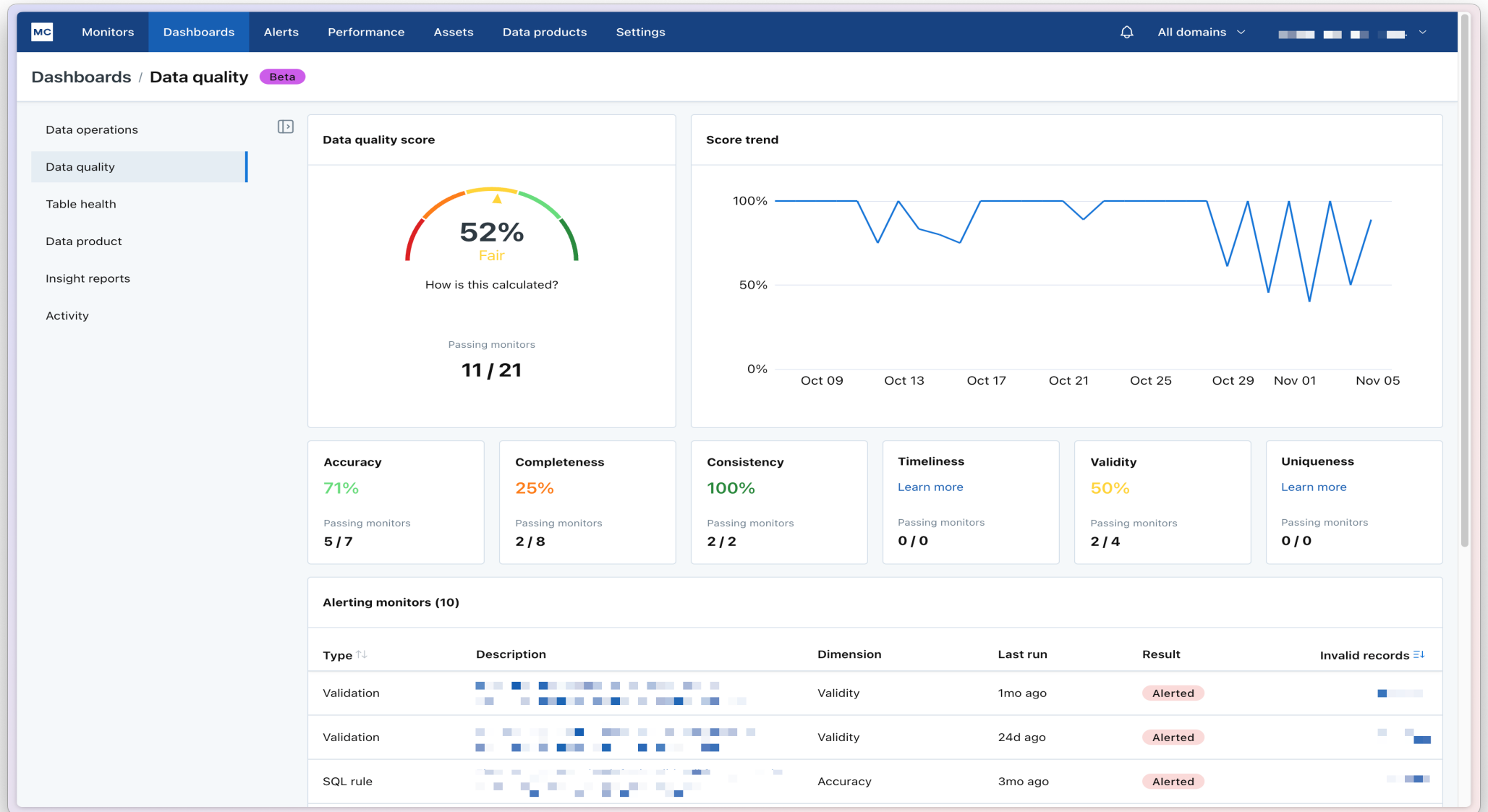


## EXAMPLE: Business Glossary



# Monte Carlo – (Dummy Data)

Monte Carlo has been onboarded as our Data Observability and Data Quality tool covering the six DQ dimensions.



# FULL TIME

**What** has been achieved so far.....



4 data products created, end to end. 12 in progress



All data engineers trained in new data product ways of working



More than 100 tables catalogued , More than 1000 glossary terms and metrics



30,000+ data objects tagged with category & classification in Alation



Lead Global Data Governance Community and Centre of Excellence for all other global brands



- Docujams - workshops to define terms and update the business data glossary in Alation
- Bi-monthly accountability forums with data and system stewards to monitor progress, share best practice, provide training & support,
- Data Council established to define data strategy, policies, and standards to achieve business goals
- Hosted UKI & Global Data Community events to strengthen the data culture



# WHAT'S NEXT?



We have the foundations, tools and engagement so now we must keep building momentum. The below are some of the areas we are focusing on driving forward.

Chat with Data proof of concept on Alation. This allows business users to chat with data products and metadata

Critical Data Element (CDE) proof of concept - automatically identifies critical data within documents and tags it in Alation

Aim to get all business users to self-serve within Alation and to identify data products

The Data Strategy has been refreshed to align with the business' AI objectives

Strengthen data governance across unstructured data.

Application of agentic AI tools to improve processes and delivery of data enablement



# POST GAME ANALYSIS



## What worked well

- How we engaged all our data owners. We had 1:1s with all 130 + which was time consuming but also built rapport and a solid foundation to build on.
- The new data product ways of working and tooling is embedded as part of the onboarding of all new data products and the governance of existing.



## What could be improved

- Identified that the approach to Maturity assessments needed to be improved.
- The assessment contains 47 questions across data enablement and data protection. It was a lot to complete for some team as it was a very manual process too.
- Agreed to onboard a system called Archer to allow an automated approach.
- Data Enablement and Data Protection questions will be separated.



## Key learnings

- People (Players) are key to success. Spend time engaging and building relationships. Even excellent game plans need people to deliver them.
- Demonstrating return on investment is critical. Keep this to the forefront of your mind and make sure to record key wins.
- Ensure that you always link back to your strategies – Data, AI, Tech.

# Q&A

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