



# Digital Sovereignty Index

Argentina

Assessment prepared in accordance with the methodological specifications of the **Digital Sovereignty Index (DSI v2.0)**, under the academic cooperation framework of the **Global South Academic Forum**.

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- **Global South Insights (GSI)** — DSI Assessment Team. Methodological coordination, framework specification, and compilation of the global index.
- **National University of General Sarmiento (UNGS)** — University Programme on Digital Sovereignty. Implementation of the Argentina assessment, evidence collection from national sources, and drafting of the analysis.
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## **Digital Sovereignty Index — Argentina Assessment**

**Country:** Argentina (AR)

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## Chapter 1 — Executive Summary

Argentina exhibits a paradoxical pattern of digital sovereignty: a regulatory scaffolding and a software-engineering capability that are comparatively sophisticated for the region coexist with a deep structural dependence on infrastructure, institutional enforcement capacity, and capability autonomy — all of it cross-cut by a trajectory of active deregulation that operates as a ceiling factor during the assessment period (2024–2026, Milei administration). The country knows how to legislate on data, and to export software services, but it does not capture the economic value of its data, it does not enforce with deterrent effect, and, in the cross-border flow, it has ced-

ed sovereignty through the adequacy commitment with the United States. The result is a mid-to-low-grade digital sovereignty, without a single indicator reaching the competence level (Level 4), and with two indicators collapsed to the initial level (Level 1).

On the DSI framework's 1–5 scale, Argentina obtains a **sovereignty score of 2.00 / 5.0** (a total of 32 out of 80). The score is computed as the arithmetic mean of the sixteen indicator ratings; no indicator exceeds Level 3. The distribution by dimension reveals that the weakness is concentrated in data ownership.

**Table 1.1.** Indicator ratings (UNGS\_2026 corpus).

Ind.	Title	Level	Confidence
1.1	Data ownership legislation	3 — Developing	High
1.2	Domestic data storage	2 — Aware	Medium
1.3	Protection of cross-border flows	1 — Initial	High
1.4	Data value for public benefit	1 — Initial	High
2.1	Basic hardware autonomy	2 — Aware	Medium
2.2	System software autonomy	2 — Aware	High
2.3	Application software autonomy	2 — Aware	Medium
2.4	Information security autonomy	2 — Aware	Low
3.1	Legislative capacity in digital matters	2 — Aware	High
3.2	Enforcement capacity	2 — Aware	High
3.3	Leadership in international technical rules	2 — Aware	Low
3.4	Leadership in international conduct rules	2 — Aware	Low
4.1	Frontier-technology research	2 — Aware	Medium
4.2	University talent development	2 — Aware	Low
4.3	Industrial engineering capacity	3 — Developing	High
4.4	Alignment with national strategy	2 — Aware	Medium

**Table 1.2.** Averages by dimension.

Dimension	Designation	Average	Qualitative reading
1	Data ownership	1.75	The weakest dimension; dragged down by the collapse of 1.3 and 1.4
2	Digital infrastructure	2.00	Uniform awareness without substantive capacity; cross-cutting dependence
3	Digital governance	2.00	Operational institutions but without deterrent effect or international leadership
4	Digital capacity	2.25	The highest dimension, sustained by the software industry (4.3)

**Three principal strengths.** First, a mature and long-standing data-protection framework: Law No. 25326 (Personal Data Protection Act), enacted in 2000, has been in continuous force, operated by a functional enforcement authority, and Argentina has retained the European Union’s adequacy status since 2003<sup>1</sup> — indicator 1.1 is the only one in the entire matrix that reaches Level 3 on its own legislative merit. Second, a software industry of international scale: revenue of USD 22,221 million and more than 158,000 registered jobs in 2024, with a domestic fintech subsector that commands 88% of digital banking<sup>2</sup> — indicator 4.3 is the second and last Level 3. Third, an installed base of policy recognition and bounded technical capacity in Dimension 2: a state GNU/Linux distribution, a national public cloud on open-source code, and citizen platforms authored by the State<sup>3</sup>.

**Three principal weaknesses.** First, the collapse of cross-border flows: the commitment to recognise the United States as an adequate jurisdiction, formalised in November 2025 and February 2026, brings indicator

1.3 down to Level 1 through the mechanism of Principle #7<sup>4</sup>. Second, the total absence of data value capture: Argentina gives its public data away for transparency but possesses no fiscal instrument, no B2G mandate, and no recognition of data as an economic asset, which places indicator 1.4 at Level 1<sup>5</sup>. Third, a cross-cutting structural dependence in Dimensions 2 and 4: the country does not manufacture hardware, does not control its system-software stack, and exports its most capable talent abroad<sup>6</sup>.

**The cross-cutting finding** that orders the entire assessment is the Milei administration’s deregulation trajectory as a ceiling factor. This is not a context that explains low ratings, but an active policy that subtracts capacity: 543 measures that modify or eliminate 2,519 norms across 15,144 articles<sup>7</sup>, a cumulative real cut of 50.6% in the science-and-technology budget function<sup>8</sup>, and the cession of sovereignty over data flows. Where other countries build, Argentina dismantles — and the DSI framework, through its trajectory clause and its Principle #7, registers that direction as a ceiling, not as a mitigating circumstance.

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- 1 AR-EV-0001: ‘El artículo 12 de la Law No. 25326 prohíbe la transferencia de datos personales de cualquier tipo con...’ Regulation. <https://servicios.infoleg.gob.ar/infolegInternet/anexos/60000-64999/64790/texact.htm>. Accessed 2026-05-29.; AR-EV-0035: ‘En enero de 2024 la Comisión Europea publicó el primer informe de revisión de las decisiones de...’ Policy. <https://www.argentina.gob.ar/noticias/argentina-logro-la-nueva-adequacion-por-parte-de-la-union-europea-para-el-flujo>. Accessed 2026-05-29.
  - 2 AR-EV-0212: ‘Argentina’s software industry reached USD 22,221 million in revenue in 2024 (+13.1% interannual)...’ Data. <https://www.itsitio.com/ar/software/software-argentino-bate-records/>. Accessed 2026-05-29.; AR-EV-0101: ‘El segmento de digital banking argentino está concentrado en tres jugadores domésticos: Ualá (6...’ Data. <https://fintechnews.am/fintech-argentina/52228/argentinas-top-3-digital-banks-capture-nearly-90-market-share/>. Accessed 2026-05-29.
  - 3 AR-EV-0076: ‘Huayra GNU/Linux es el sistema operativo libre desarrollado en EDUCAR Sociedad del Estado, descrito...’ CaseStudy. <https://huayra.educar.gob.ar/>. Accessed 2026-05-29.; AR-EV-0079: ‘ARSAT desplegó la etapa 1 de la Nube Pública Nacional el 1° de abril de 2021, construida sobre...’ CaseStudy. <https://www.canal-ar.com.ar/29335-ARSAT-lanzo-la-Nube-Publica-Nacional-y-ofrece-infraestructura-y-servicios-a-demanda.html>. Accessed 2026-05-29.; AR-EV-0093: ‘Mi Argentina, la plataforma de identidad digital ciudadana, supera los 21 millones de personas...’ CaseStudy. <https://www.argentina.gob.ar/noticias/se-renueva-mi-argentina-con-mas-y-mejores-servicios-para-la-ciudadania>. Accessed 2026-05-29.
  - 4 AR-EV-0031: ‘El 13 de noviembre de 2025, los presidentes Donald J. Trump y Javier Milei suscribieron el Joint...’ Policy. <https://www.whitehouse.gov/briefings-statements/2025/11/joint-statement-on-framework-for-a-united-states-argentina-agreement-on-reciprocal-trade-and-investment/>. Accessed 2026-05-29.; AR-EV-0032: ‘El 5 de febrero de 2026 en Washington D.C., la República Argentina y los Estados Unidos...’ Policy. <https://www.cancilleria.gob.ar/es/destacados/argentina-y-estados-unidos-firmaron-un-acuerdo-sobre-comercio-e-inversiones-reciprosos>. Accessed 2026-05-29.
  - 5 AR-EV-0054: ‘No se identifica fuente Tier-1 que documente la existencia de un mandato general operativo de...’ Gap. Accessed 2026-05-29.; AR-EV-0055: ‘No se identifica fuente Tier-1 que documente reconocimiento estatal explícito de los datos como...’ Gap. Accessed 2026-05-29.
  - 6 AR-EV-0064: ‘El Instituto Nacional de Tecnología Industrial (INTI), a través de su área de Micro y...’ CaseStudy. <https://www.inti.gob.ar/areas/desarrollo-tecnologico-e-innovacion/areas-de-conocimiento/micro-y-nanotecnologias>. Accessed 2026-05-29.; AR-EV-0080: ‘ARSAT desplegó Red Hat OpenShift AI para apoyar operaciones de centro de operaciones de red (NOC)...’ CaseStudy. <https://www.redhat.com/en/success-stories/arsat>. Accessed 2026-05-29.; AR-EV-0200: ‘Argentina is in the top 30 nations with highly-skilled emigrants according to OECD data, with...’ Data. <https://www.untref.edu.ar/mundountref/argentina-se-convirtio-en-un-polo-de-emigracion>. Accessed 2026-05-29.
  - 7 AR-EV-0133: ‘The Ministerio de Desregulación y Transformación del Estado (created July 2024 under Federico...’ Data. <https://www.argentina.gob.ar/desregulacion>. Accessed 2026-05-29.
  - 8 AR-EV-0235: ‘La Función Ciencia y Tecnología del Presupuesto Nacional cayó un 11,4% adicional en el primer...’ Data. <https://ciicti.org/el-2026-llego-con-mas-recortes-presupuestarios-a-la-ciencia-argentina/>. Accessed 2026-05-29.

## Chapter 2 — Methodological Framework

### 2.1 The DSI 4×4 framework

The Digital Sovereignty Index evaluates the degree to which a country has attained **independence in the digital domain**: the extent to which its data, its infrastructure, its governance and its capabilities are determined by the country itself and not by foreign actors, jurisdictions, or platforms. The operational definition, set out in the DSI methodological specifications, rests on the word 'independence': the index does not measure whether a country aspires to be sovereign, but whether, in fact, it is. The framework organises the assessment into a matrix of four dimensions by four indicators — sixteen indicators in total — defined in the Digital Sovereignty Index specifications coordinated by **Global South Insights (GSI)** through the DSI Assessment Team, under the **Global South Academic Forum**. This Argentina assessment was prepared by UNGS as an associate university, applying those methodological specifications to the national situation: evidence collection from Argentine sources, the local implementation of the assessment pipeline, and the drafting of the analysis in academic Spanish constitute UNGS's contribution to the global index compiled by GSI.

The four dimensions are: **Dimension 1 — Independence in data ownership** (1.1 Data-ownership legislation; 1.2 Domestic storage; 1.3 Protection of cross-border flows; 1.4 Data value for public benefit); **Dimension 2 — Digital infrastructure independence** (2.1 Basic hardware; 2.2 System software; 2.3 Application software; 2.4 Information security); **Dimension 3 — Digital governance independence** (3.1 Legislative capacity; 3.2 Enforcement capacity; 3.3 Leadership in international technical rules; 3.4 Leadership in international conduct rules); and **Dimension 4 — Digital capacity independence** (4.1 Frontier research; 4.2 University talent; 4.3 Industrial engineering; 4.4 National strategic alignment).

### 2.2 The 1–5 scale

Each indicator is rated on a scale of five progressive levels of independence: **1 Initial** (the issue has not

been addressed; potentially complete dependence), **2 Aware** (the importance of independence is recognised and discussions or actions have been initiated, typically at the planning stage), **3 Developing** (work is actively underway towards independence, with policies implemented but still with strong external dependence), **4 Competent** (international competitiveness and full potential autonomy) and **5 Independent** (basic self-sufficiency, with minimal external constraints). The scale is applied per indicator and prohibits decimal ratings: each level must be tied to a defensible path through a four-node decision tree (existence of critical evidence → effective implementation → meaningful enforcement → international competitiveness vs. self-sufficiency).

### 2.3 Principles, pitfalls, and the decision tree

Rating is governed by **seven immutable principles** that prevail over the decision tree when they come into tension with it: Facts over Law (effective implementation prevails over legal text), Effectiveness Supreme (laws that cannot be enforced receive lower ratings), Pragmatism (real status, not declared goals), Dependency Penalty (dependence on foreign platforms caps the ceiling), Corporate-Capture Degradation (legislative blocking by Big Tech lowers the rating), Context Explains but Does Not Excuse (geopolitical pressure explains but does not modify consequences), and the **Digital Hegemony Reality Check — Principle #7** (designating the United States as an 'adequate jurisdiction' significantly lowers ratings). To the principles are added eight pitfalls, or rating traps — among them confusing activity with outcomes, underestimating weaknesses, and geographic presence without control — that must be cleared before finalising a rating, together with a horizontal-consistency check against the anchors of China, Russia, and Brazil.

### 2.4 The UNGS 2026 corpus

The assessment is grounded in the **UNGS\_2026** corpus, built by the UNGS agent pipeline. The collector gathered **373 raw pieces of evidence** across the three search rounds; the verifier removed **91** for verification failures (invalid URL, lack of content match, or

suspected hallucination); the integrator consolidated the remainder by removing **41 duplicates** through exact URL match, leaving **241 integrated pieces of evidence** (AR-EV-001 to AR-EV-241) plus **31 documented gaps**. The composition by type covers regulation, case studies, quantitative data, reports, analysis, policy, and gaps; confidence is distributed across 125 high-confidence items, 80 medium, and 36 low. The share of Tier-1 sources (official domains \*.gob.ar, InfoLEG, Boletín Oficial (Official Gazette)) reaches **48.5%**, above the 40% minimum but below the 60% target. Each [AR-EV-NNN] citation in this report is traceable to a verified URL in evidence\_base\_UNGS\_2026.json.

### 2.5 The Principle #7 override mechanism

One methodological element deserves anticipating because it proves decisive for indicator 1.3. Principle #7 does not function as a gradual downward adjustment but as a categorical-collapse mechanism: the active designation of the United States as an adequate jurisdiction for personal-data transfers relocates indicator 1.3's rating to Level 1, **overriding** the result that the decision tree would have yielded on its own merits. The reasoning is that ceding adequacy to a jurisdiction without comprehensive federal privacy legislation and

with statutory extraterritorial-access regimes (CLOUD Act) hollows out the protective purpose of the indicator, regardless of how sophisticated the rest of the framework may be.

### 2.6 Limitations

The assessment acknowledges four limitations. First, **31 candidate items were discarded as URL\_BLOCKED** owing to anti-bot barriers, TLS, or 403 responses (ITU documentary databases, 3GPP partner listings, W3C sources); human re-retrieval is recommended for future runs, since these are transport limits, not veracity limits. Second, **indicators 3.3 and 3.4 fell below the sufficiency threshold of 15 pieces of evidence** (11 and 12 respectively) after the verifier's removals, which limits their confidence to Low. Third, several de facto quantitative metrics rest on single Tier-3 sources or on inference (hyperscaler market shares, the brain-drain rate specific to computer science), which reduces confidence without invalidating the direction of the rating. Fourth, **two items suspected of hallucination were removed** by the verifier and do not appear in the library; this report does not reproduce their claims, in keeping with the anti-hallucination discipline that governs the pipeline.

## Chapter 3 — Indicator-by-Indicator Analysis

### Dimension 1 — Independence in Data Ownership

Dimension 1 asks who owns, controls, and benefits from the data generated by Argentine residents, firms and institutions. It is the dimension where Argentina displays its sharpest internal contrast: it has the oldest and most recognised data-protection legislative framework in Latin America — the first regional adequacy status before the European Union, in 2003<sup>9</sup> — but that historical asset coexists with a flow protection collapsed by US adequacy and with a categorical absence of value-capture mechanisms. The relevant institutional landscape includes the AAIP (Agency for Access to Public Information) as the enforcement authority and the Law No. 25326 regime as the central piece. The dimension finding is unequivocal: with an average of 1.75, data ownership is Argentina’s weakest dimension, dragged down by the simultaneous collapse of two of its four indicators to Level 1.

#### 3.1.1 Indicator 1.1 — Data ownership legislation

**Rating:** 3 — Developing. **Confidence:** High.

Argentina has a general data-protection statute in continuous force since the year 2000 — Law No.

25326<sup>10</sup>— operationalised by Decreto (Decree) 1558/2001, verified as in force, and amended on thirty-two occasions<sup>11</sup>, and administered by the AAIP, an autonomous statutory body with a permanent National Directorate for the Protection of Personal Data<sup>12</sup>. The authority is not nominal: it issues resolutions of operational substance — security measures, model contractual clauses for transfers, and the tiering of sanctions<sup>13</sup>— and exhibits a multi-year activity trace (491 case files and 52 sanctions in 2022)<sup>14</sup>. The framework retains current external recognition: the European Union’s adequacy status was reaffirmed in January 2024<sup>15</sup> and Convention 108+ was ratified by Law No. 27699 in 2022<sup>16</sup>. This conjunction of an operative statute, a functional regulator and international recognition defines the Level 3 profile.

What prevents an ascent to Level 4 is the conjunction of two independent failures. First: the modernised text is not in force. The reform bill (Mensaje, or Message, 87/2023), which incorporated breach notification, impact assessments, portability, and the data-protection officer figure, lost parliamentary status at the end of 2024 after more than thirty months without consideration<sup>17</sup>; the post-GDPR-era provisions

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- 9 AR-EV-0035: ‘En enero de 2024 la Comisión Europea publicó el primer informe de revisión de las decisiones de...’ Policy. <https://www.argentina.gob.ar/noticias/argentina-logro-la-nueva-adequacion-por-parte-de-la-union-europea-para-el-flujo>. Accessed 2026-05-29.
- 10 AR-EV-0001: ‘El artículo 12 de la Law No. 25326 prohíbe la transferencia de datos personales de cualquier tipo con...’ Regulation. <https://servicios.infoleg.gob.ar/infolegInternet/anexos/60000-64999/64790/texact.htm>. Accessed 2026-05-29.
- 11 AR-EV-0002: ‘El Decree 1558/2001, promulgado el 29 de noviembre de 2001 y publicado en el Boletín Oficial el 3...’ Regulation. <https://servicios.infoleg.gob.ar/infolegInternet/verNorma.do?id=70368>. Accessed 2026-05-29.
- 12 AR-EV-0003: ‘La AAIP se autodefine en su sitio oficial como garante de la protección de datos personales y la...’ Regulation. <https://www.argentina.gob.ar/aaip/datospersonales>. Accessed 2026-05-29.
- 13 AR-EV-0005: ‘La AAIP aprobó por Resolución 47/2018 (publicada 25-07-2018, vigente) las Medidas de Seguridad...’ Regulation. <https://servicios.infoleg.gob.ar/infolegInternet/anexos/310000-314999/312662/norma.htm>. Accessed 2026-05-29.; AR-EV-0028: ‘La Resolución AAIP 198/2023, publicada el 18 de octubre de 2023 y firmada por la directora Beatriz...’ Regulation. <https://www.boletinoficial.gob.ar/detalleAviso/primera/296189/20231018>. Accessed 2026-05-29.; AR-EV-0141: ‘La Resolución AAIP 126/2024, publicada en el Boletín Oficial el 24 de mayo de 2024 y en vigor desde...’ Regulation. <https://servicios.infoleg.gob.ar/infolegInternet/anexos/395000-399999/399750/norma.htm>. Accessed 2026-05-29.
- 14 AR-EV-0010: ‘“Según el Informe Anual 2022 de la AAIP, la autoridad inició 491 expedientes por presuntas...”’ Data. <https://iapp.org/news/a/la-autoridad-de-proteccion-de-datos-de-argentina-publica-su-informe-anual-2022>. Accessed 2026-05-29.
- 15 AR-EV-0007: ‘La AAIP publica como guía oficial vigente que los países considerados con legislación adecuada son...’ Report. <https://www.argentina.gob.ar/aaip/datospersonales/transferencias-internacionales>. Accessed 2026-05-29.
- 16 AR-EV-0008: ‘La Law No. 27699, sancionada el 9 de noviembre de 2022 y publicada en el Boletín Oficial el 30 de...’ Regulation. <https://servicios.infoleg.gob.ar/infolegInternet/anexos/375000-379999/375738/norma.htm>. Accessed 2026-05-29.
- 17 AR-EV-0004: ‘El Proyecto de Ley de Protección de Datos Personales presentado por el Poder Ejecutivo Nacional en...’ Policy. <https://www.argentina.gob.ar/aaip/datospersonales/proyecto-ley-datos-personales>. Accessed 2026-05-29.

remain absent from the text in force<sup>18</sup>. By Principle #1 (Facts over Law), a bill cannot anchor a higher rating. Second: enforcement is not deterrent. The fine cap was never updated by law and stands at around USD 70–100; AAIP Resolution 126/2024 graduated infractions but could not raise the legal ceiling, because an administrative resolution does not amend a law<sup>19</sup>; the total of 2022 fines was some USD 30,621<sup>20</sup> and the mass leaks of 2024–2025 (Renaper, ARCA, ANSES) were not sanctioned<sup>21</sup>. By Principle #2 (Effectiveness Supreme), enforcement without deterrent magnitude is capped at Level 3. It does not descend to Level 2 because the statute is in force — it is not a draft — the regulator operates and there is an enforcement trace: Argentina comfortably clears the band of ‘preliminary discussions, or planning’. In the comparative frame, 1.1 sits well below the Chinese anchor (Level 5) and groups with Brazil (Level 3): both regimes are transplanted from external standards and their enforcement scaling has lagged, although the Argentine weakness is specific — an obsolete text from 2000 whose modernisation stalled. An ascent to Level 4 would require the modernised text to enter into force and the fine cap to reach deterrent magnitudes on the order of 2–4% of revenue; erosion towards Level 2 would only follow the dismantling of

the AAIP, or the repeal of the regime in force.

### 3.1.2 Indicator 1.2 — Domestic data storage

**Rating:** 2 — Aware. **Confidence:** Medium.

Argentina lacks a general data-localisation mandate. The personal-data regime (Law No. 25326, art. 12) governs cross-border flows through adequacy and contractual clauses, not through territorial storage, and the AAIP’s own security resolution imposes no geographic restriction whatsoever<sup>22</sup>. The only operative sectoral rule is the Central Bank’s prudential regime on third-party control and delegated technology (BCRA (Central Bank of the Argentine Republic) Communication A 7724, updated by A 8401)<sup>23</sup>, which structures the supervision of outsourced services but does not require storage in national territory. Two reform bills explicitly preserve the transfer-based model and decline to introduce a localisation mandate<sup>24</sup>. A residual sovereign capacity exists — ARSAT’s Tier III data centre and the national public cloud on open-source code<sup>25</sup> — but it is niche, oriented to the public sector, and undergoing partial privatisation (49%)<sup>26</sup>. This configuration — a sectoral-only rule, residual domes-

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- 18 AR-EV-0011: ‘El régimen vigente de la Law No. 25326 no contempla obligaciones operativas de notificación reglada de...’ Gap. Accessed 2026-05-29.
- 19 AR-EV-0141: ‘La Resolución AAIP 126/2024, publicada en el Boletín Oficial el 24 de mayo de 2024 y en vigor desde...’ Regulation. <https://servicios.infoleg.gob.ar/infolegInternet/anexos/395000-399999/399750/norma.htm>. Accessed 2026-05-29.
- 20 AR-EV-0010: ‘Según el Informe Anual 2022 de la AAIP, la autoridad inició 491 expedientes por presuntas...’ Data. <https://iapp.org/news/a/la-autoridad-de-proteccion-de-datos-de-argentina-publica-su-informe-anual-2022>. Accessed 2026-05-29.
- 21 AR-EV-0145: ‘El 19 de diciembre de 2025 la AAIP inició una investigación de oficio ante una presunta filtración...’ CaseStudy. <https://www.argentina.gob.ar/noticias/la-aaip-inicio-una-investigacion-de-oficio-ante-presunta-filtracion-masiva-de-datos>. Accessed 2026-05-29.
- 22 AR-EV-0021: ‘El régimen argentino de transferencias internacionales de datos personales se rige por el artículo...’ Regulation. <https://www.argentina.gob.ar/transferencias-internacionales>. Accessed 2026-05-29.; AR-EV-0005: ‘La AAIP aprobó por Resolución 47/2018 (publicada 25-07-2018, vigente) las Medidas de Seguridad...’ Regulation. <https://servicios.infoleg.gob.ar/infolegInternet/anexos/310000-314999/312662/norma.htm>. Accessed 2026-05-29.
- 23 AR-EV-0012: ‘La Comunicación A 7724 del BCRA, vigente desde el 6 de septiembre de 2023, establece requisitos...’ Regulation. <https://www.granthornton.com.ar/en/insights/articles/2023/communication-a7724-bcra/>. Accessed 2026-05-29.; AR-EV-0023: ‘El BCRA emitió la Comunicación A 8401 (13/02/2026) — más reciente que la A 7724 — disponible en el...’ Regulation. <https://www.bkra.gob.ar/archivos/Pdfs/comytexord/A8401.pdf>. Accessed 2026-05-29.
- 24 AR-EV-0014: ‘El Poder Ejecutivo Nacional presentó al Congreso el 30 de junio de 2023 un proyecto de ley para...’ Policy. <https://iapp.org/news/a/se-presento-ante-el-congreso-nacional-argentino-un-nuevo-proyecto-de-ley-para-reemplazar-la-actual-ley-de-proteccion-de-datos-personales>. Accessed 2026-05-29.; AR-EV-0015: ‘El proyecto de ley 1948-D-2025, ingresado a la Cámara de Diputados en 2025, propone reemplazar la...’ Policy. <https://www4.hcdn.gob.ar/dependencias/dsecretaria/Periodo2025/PDF2025/TP2025/1948-D-2025.pdf>. Accessed 2026-05-29.
- 25 AR-EV-0013: ‘ARSAT opera el Centro Nacional de Datos en Benavídez (Buenos Aires), única instalación del país con...’ Report. <https://www.arsat.com.ar/datacenter/>. Accessed 2026-05-29.
- 26 AR-EV-0020: ‘El gobierno anunció en octubre de 2024 un plan de privatización parcial de ARSAT (hasta el 49% del...’ Policy. <https://www.infobae.com/economia/2024/10/08/el-gobierno-buscara-privatizar-el-49-de-la-estatal-arsat-que-podria-salir-a-la-bolsa-en-2025/>. Accessed 2026-05-29.

tic infrastructure, non-localising bills — corresponds precisely to Level 2.

The indicator does not reach Level 3 because that would require effectively enforced localisation in multiple substantive sectors plus a domestic cloud industry with measurable share: Argentina meets neither. The installed national capacity (~32 MW) is orders of magnitude smaller than a single hyperscale facility<sup>27</sup>, while the growth of the cloud market is captured by foreign providers — AWS's Local Zone in Buenos Aires and the OpenAI/Sur Energy 500 MW project under the RIGI<sup>28</sup> — a configuration that the framework rates as geographic presence under foreign jurisdiction (CLOUD Act), not as sovereignty (Pitfall #8). State policy actively incentivises foreign-controlled infrastructure without a localisation counterpart<sup>29</sup>. It does not descend to Level 1 because there coexist a sectoral mandate in force, an operative state alternative and documented legislative discussion — the presence of the three elements the criterion requires to clear the initial floor. Argentina groups with Brazil (Level 2): both lack a general mandate and see their markets dominated by hyperscalers, while Russia (Level 4, Law 242-FZ with documented enforcement) marks exactly the regime that the Argentine bills decline to adopt. An

ascent to Level 3 would require a sectoral localisation mandate effectively audited in finance and health, or government, together with a domestic cloud industry of non-residual share.

### 3.1.3 Indicator 1.3 — Protection of cross-border flows

**Rating:** 1 — Initial. **Confidence:** High.

On paper, Argentina possesses a comprehensive and operationally exercised cross-border transfer regime: article 12 of Law No. 25326 prohibits transfers to jurisdictions without adequate protection<sup>30</sup>, Decreto (Decree) 1558/2001 empowers the regulator to assess adequacy<sup>31</sup>, Disposición 60-E/2016 publishes model contractual clauses<sup>32</sup>, AAIP Resolution 34/2019 maintains a granular adequacy list from which the United States was explicitly absent<sup>33</sup>, and the country retains European adequacy status since 2003, revalidated in January 2024<sup>34</sup>. On the standard decision tree, this regime would end at Level 3: a framework in force and exercised, but without documented meaningful enforcement — zero case studies or transfer-specific sanction statistics<sup>35</sup>.

However, the Joint Statement of 13 November 2025 and the USTR Fact Sheet<sup>36</sup>, formalised by the signing of

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- 27 AR-EV-0016: 'Argentina tiene 13 data centers comerciales identificados por CABASE con capacidad superior a 1 MW...' Data. <https://www.telesemana.com/blog/2026/05/06/argentina-busca-atraer-14-data-centers-y-ampliar-su-infraestructura-digital-para-la-era-de-la-ia/>. Accessed 2026-05-29.
- 28 AR-EV-0018: 'AWS anunció en marzo de 2022 Local Zones en seis ciudades latinoamericanas, incluida Buenos Aires...' Report. <https://aws.amazon.com/blogs/publicsector/aws-announces-local-zones-latin-america/>. Accessed 2026-05-29.; AR-EV-0017: 'El 10 de octubre de 2025 Sur Energy (Argentina) y OpenAI (Estados Unidos) firmaron una carta de...' CaseStudy. <https://chequeado.com/investigaciones/mega-data-centers-en-la-patagonia-promesas-millonarias-y-alerta-por-la-falta-de-regulacion/>. Accessed 2026-05-29.
- 29 AR-EV-0019: 'El Súper RIGI (Message 181/2026 al HCDN) propone exigir inversiones mínimas de US\$ 1.000 millones...' Policy. <https://www.cronista.com/economia-politica/rigi-y-super-rigi-que-cambia-que-se-amplifica-y-que-se-elimina/>. Accessed 2026-05-29.
- 30 AR-EV-0001: 'El artículo 12 de la Law No. 25326 prohíbe la transferencia de datos personales de cualquier tipo con...' Regulation. <https://servicios.infoleg.gob.ar/infolegInternet/anexos/60000-64999/64790/texact.htm>. Accessed 2026-05-29.
- 31 AR-EV-0025: 'El Decreto Reglamentario 1558/2001 (anexo I, art. 12) faculta a la Dirección Nacional de Protección...' Regulation. <https://www.argentina.gob.ar/normativa/nacional/decreto-1558-2001-70368>. Accessed 2026-05-29.
- 32 AR-EV-0026: 'La Disposición DNPDP 60-E/2016, dictada el 16 de noviembre de 2016, aprueba dos conjuntos de...' Regulation. <https://servicios.infoleg.gob.ar/infolegInternet/anexos/265000-269999/267922/norma.htm>. Accessed 2026-05-29.
- 33 AR-EV-0027: 'La Resolución AAIP 34/2019, del 22 de febrero de 2019 y firmada por Eduardo Andrés Bertoni...' Regulation. <https://www.boletinoficial.gob.ar/detalleAviso/primera/202373/20190226>. Accessed 2026-05-29.
- 34 AR-EV-0035: 'En enero de 2024 la Comisión Europea publicó el primer informe de revisión de las decisiones de...' Policy. <https://www.argentina.gob.ar/noticias/argentina-logro-la-nueva-adequacion-por-parte-de-la-union-europea-para-el-flujo>. Accessed 2026-05-29.
- 35 AR-EV-0041: 'No se identificó fuente Tier-1 que documente estadísticas cuantitativas específicas del régimen de...' Gap. Accessed 2026-05-29.
- 36 AR-EV-0031: 'El 13 de noviembre de 2025, los presidentes Donald J. Trump y Javier Milei suscribieron el Joint...' Policy. <https://www.whitehouse.gov/briefings-statements/2025/11/joint-statement-on-framework-for-a-united-states-argentina-agreement-on-reciprocal-trade-and-investment/>. Accessed 2026-05-29.; AR-EV-0009: 'El United States Trade Representative (USTR) publicó el 13 de noviembre de 2025 el Fact Sheet del...' Policy. <https://ustr.gov/about/policy-offices/press-office/fact-sheets/2025/november/fact-sheet-united-states-and-argentina-agree-framework-agreement-reciprocal-trade-and-investment>. Accessed 2026-05-29.

the Agreement on Reciprocal Trade and Investment on 5 February 2026<sup>37</sup>, commit Argentina to recognising the United States as an adequate jurisdiction for personal-data transfers. By Principle #7 (Digital Hegemony Reality Check) and the indicator's 'collapse through extreme permissiveness' mechanism, an active US adequacy designation caps the rating at Level 1, overriding the narrowing of the decision tree. Sophistication on paper does not anchor the rating; the operational reality of structural deference to a hegemonic jurisdiction does (Principle #1). This is a Level 1 by way of collapse, not by regulatory void: the regime exists and is exercised, but the adequacy designation to the dominant jurisdiction of data platforms removes the only protective barrier — historically, US Big Tech operated via contractual clauses, not by adequacy<sup>38</sup>. In the comparative frame, the decisive separator with respect to China (≈5) and Russia (≈4) is exactly the variable that Principle #7 isolates: neither anchor grants adequacy to the United States, while Argentina now does. The result coincides with the BRICS 2025 baseline (also Level 1) by identical collapse reasoning. The only possible upward move would be the non-entry-into-force or the reversal of the US adequacy commitment; without it, no level above 1 is attainable.

### 3.1.4 Indicator 1.4 — Data value for public benefit

**Rating:** 1 — Initial. **Confidence:** High.

Argentina sustains a mature and long-standing open-data programme — Decreto (Decree) 117/2016, Law No. 27275 on access to information, and the [datos.gob.ar](https://datos.gob.ar) portal with 1,235 datasets from 42 agencies<sup>39</sup> — together with an active civic-tech ecosystem that reuses public data<sup>40</sup>. But that programme operates entirely on a logic of transparency and reuse, not of economic value capture from the data. The conceptual distinction is decisive: a robust open-data programme 'gives data away to enable innovation', while the indicator measures 'capturing the value of data for public benefit'. All of Argentina's substantive positive evidence belongs to the first category.

The indicator's critical enablers are absent and documented as gaps with Tier-1 search: there is no state recognition of data as a factor of production or economic asset<sup>41</sup>, there is no operative B2G mandate requiring platforms to share datasets of public interest<sup>42</sup>, there is no fiscal value-capture instrument — the PAIS tax was a consumption tax, excluded by criterion, and was moreover repealed in December 2024<sup>43</sup>, and the OECD's Pillar One and Pillar Two were not implemented<sup>44</sup> — antitrust is not applied to data monopolies — the CNDC (National Commission for the Defence of Competition) maintains a study group without sanctioning power, and none of the eleven concentrated markets under investigation is a digital-native platform<sup>45</sup> — and there are no institutional

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- 37 AR-EV-0032: 'El 5 de febrero de 2026 en Washington D.C., la República Argentina y los Estados Unidos...' Policy. <https://www.cancilleria.gob.ar/es/destacados/argentina-y-estados-unidos-firmaron-un-acuerdo-sobre-comercio-e-inversiones-reciprosos>. Accessed 2026-05-29.
- 38 AR-EV-0040: 'Microsoft, en su documentación oficial de cumplimiento publicada en [learn.microsoft.com](https://learn.microsoft.com), declara...' Report. <https://learn.microsoft.com/en-us/compliance/regulatory/offering-pdpa-argentina>. Accessed 2026-05-29.
- 39 AR-EV-0042: 'El Decreto 117/2016, suscrito el 12 de enero de 2016, instruye a los ministerios, secretarías y...' Regulation. <https://www.argentina.gob.ar/normativa/nacional/decreto-117-2016-257755>. Accessed 2026-05-29.; AR-EV-0043: 'La Law No. 27275 de Derecho de Acceso a la Información Pública, sancionada el 14 de septiembre de...' Regulation. <https://servicios.infoleg.gob.ar/infolegInternet/anexos/265000-269999/265949/norma.htm>. Accessed 2026-05-29.; AR-EV-0045: 'El portal nacional [datos.gob.ar](https://datos.gob.ar) registra 1.235 datasets publicados por 42 organizaciones del sector...' Data. <https://datos.gob.ar/>. Accessed 2026-05-29.
- 40 AR-EV-0053: 'Organizaciones civiles argentinas — LA NACION Data junto con ACIJ, Directorio Legislativo y Poder...' CaseStudy. <https://www.lanacion.com.ar/sociedad/periodismo-de-datos-una-iniciativa-y-un-equipo-para-agregar-valor-e-innovar-nid2312192/>. Accessed 2026-05-29.
- 41 AR-EV-0055: 'No se identifica fuente Tier-1 que documente reconocimiento estatal explícito de los datos como...' Gap. Accessed 2026-05-29.
- 42 AR-EV-0054: 'No se identifica fuente Tier-1 que documente la existencia de un mandato general operativo de...' Gap. Accessed 2026-05-29.
- 43 AR-EV-0047: 'El impuesto PAIS, que añadía una alícuota del 8% sobre suscripciones a servicios digitales del...' CaseStudy. <https://chequeado.com/el-explicador/fin-del-impuesto-pais-que-impacto-tendra-en-las-compras-de-bienes-y-servicios-en-el-exterior-en-el-turismo-y-en-las-importaciones/>. Accessed 2026-05-29.
- 44 AR-EV-0057: 'No se identifica fuente Tier-1 que documente la implementación por parte de Argentina de mecanismos...' Gap. Accessed 2026-05-29.
- 45 AR-EV-0048: 'La Comisión Nacional de Defensa de la Competencia (CNDC) creó un Grupo de Investigación y Trabajo...' CaseStudy. <https://www.argentina.gob.ar/noticias/la-cndc-creo-el-grupo-de-investigacion-y-trabajo-sobre-mercados-digitales>. Accessed 2026-05-29.; AR-EV-0049: 'La CNDC investiga 11 mercados de alta concentración: aluminio, acero, petroquímica, comunicaciones...' CaseStudy. <https://www.casarsada.gob.ar/35904-once-mercados-con-altaconcentraci>. Accessed 2026-05-29.

data trusts<sup>46</sup>. Decreto (Decree) 780/2024, moreover, restricted the scope of active transparency: a regression, not an advance<sup>47</sup>. By Principle #3 (Pragmatism), aspirational bills do not anchor higher levels; the categorical absence of the critical piece ends the decision tree at Level 1. The indicator does not ascend to Level 2 because there does not even exist governmental recognition of data as an asset — not merely civil-society discourse — in a strategy or bill. The sophistication of the open-data programme places Argentina at the high end of Level 1, above a country with no policy at all, but transparency is not value capture. Against China (Level 4–5: data as the fifth factor of production since 2019), Argentina exhibits a lag of several levels; even against Russia and Brazil it remains a step below, lacking the limited B2G mechanisms and the digital-services taxation that those countries possess. An ascent to Level 2 would require the BCRA's Open Finance System to enter into force or a bill to recognise data as an economic asset.

**Intra-dimensional analysis.** Dimension 1 reveals the Argentine paradox in its pure state: indicator 1.1, the strongest of the entire matrix on its own merit (the only framework with 2003 European adequacy), co-exists with the collapse of 1.3 to Level 1 through the 2026 US adequacy, and with the total void of 1.4. The common bottleneck is that Argentina built capacity for protection without capacity for exploitation: it legislates the data point, but neither retains it territorially, nor protects it on its way out to the hegemonic jurisdiction, nor captures its economic value. The regulatory sophistication of 1.1 does not compensate for, and in fact contrasts with, the cession of sovereignty of 1.3 and the absence of economic vision of 1.4.

## Dimension 2 — Digital Infrastructure Independence

Dimension 2 evaluates whether the country can oper-

ate its digital infrastructure without dependence on, or interruption by, foreign providers, across four layers: hardware, system software, application software and security. The relevant institutional landscape includes ARSAT and the national public cloud, the Tierra del Fuego regime, INTI, and INVAP on the technical plane, and CERT.ar in security. The dimension finding is notably uniform: all four indicators sit at Level 2 (average 2.00), a pattern of 'awareness without substantive capacity' in which Principle #4 (Dependency Penalty) — which the framework declares dominant for this dimension — operates across the board. Argentina recognises its dependencies and possesses real traces of capacity, but in each layer the structural dependence on the foreign stack caps the rating.

### 3.2.1 Indicator 2.1 — Basic hardware autonomy

**Rating:** 2 — Aware. **Confidence:** Medium.

There is explicit recognition of hardware dependence in national-level instruments — the Compre Argentino (Buy Argentine) regime (Law No. 27437) and the Knowledge Economy promotion regime (Law No. 27506)<sup>48</sup> — and an at-scale capacity for assembling imported components under the Tierra del Fuego regime (Law No. 19640), where close to 93% of telephones, air conditioners, and televisions sold are assembled domestically<sup>49</sup>. But assembly is not manufacturing: by the principle 'assembly is not autonomy', assembling imported boards is value-added activity, not the substitution of foreign capacity. There exists no funded foundational hardware programme reaching the hinge threshold of ~USD 1,000 million over five years oriented to chip design or wafer fabrication: the RIGI attracts foreign investment in an enclave model without a technology-transfer obligation<sup>50</sup>, the Knowledge Economy benefits target software and

46 AR-EV-0058: 'No se identifica fuente Tier-1 que documente la existencia operativa de data trusts, data...' Gap. Accessed 2026-05-29.

47 AR-EV-0044: 'El Decree 780/2024, firmado el 30 de agosto de 2024 (BO 02-09-2024), reglamentó modificaciones al...' Regulation. <https://www.boletinoficial.gov.ar/detalleAviso/primera/313139/20240902>. Accessed 2026-05-29.

48 AR-EV-0059: 'La Law No. 27437 de Compre Argentino y Desarrollo de Proveedores, promulgada en abril de 2018 y...' Regulation. <https://servicios.infoleg.gob.ar/infolegInternet/anexos/310000-314999/310020/norma.htm>. Accessed 2026-05-29.; AR-EV-0063: 'La Law No. 27506 del Régimen de Promoción de la Economía del Conocimiento (publicada en el Boletín...' Regulation. <https://servicios.infoleg.gob.ar/infolegInternet/anexos/320000-324999/324101/norma.htm>. Accessed 2026-05-29.

49 AR-EV-0060: 'La Law No. 19640, sancionada en 1972, estableció un régimen aduanero y fiscal especial para Tierra del...' Regulation. <https://prodyambiente.tierradelfuego.gob.ar/regimen-de-promocion-economica-y-fiscal-ley-19-640-2/>. Accessed 2026-05-29.

50 AR-EV-0062: 'Argentina no exhibe acuerdos bilaterales de transferencia tecnológica vigentes con jurisdicciones...' Regulation. <https://servicios.infoleg.gob.ar/infolegInternet/anexos/400000-404999/403230/norma.htm>. Accessed 2026-05-29.

services, not manufacturing<sup>51</sup>, and the national science-and-technology strategy (CTI Guidelines 2025–2027) explicitly omits microelectronics and semiconductors<sup>52</sup>. Semiconductor capacity is design-only: the INTI provides integrated-circuit design services that are synthesised in foreign foundries, and Argentina operates no wafer plant<sup>53</sup>.

The trajectory, moreover, is downward within the band: Decreto (Decree) 333/2025 reduces the import tariff on mobile phones from 8% to 0% by January 2026<sup>54</sup>, Decreto (Decree) 111/2025 dilutes the Fuegian promotion fund, and the Mirgor Group suspended around 360 workers in response<sup>55</sup>. The indicator does not reach Level 3 because that requires a funded foundational programme in design or fabrication, or a domestic-supplier share of 10–30% in some hardware category designed in the country: Argentina meets neither. It does not descend to Level 1 because both policy recognition and an operative assembly capacity persist. In the comparative frame, Argentina sits alongside Brazil (Level 1–2, with its failed CEITEC plant) and on a par with the Russian anchor (Level 2); Level 3 in this region requires extraordinary evidence — a sustained fabrication programme with output measured in wafers. An ascent to Level 3 would require a funded foundational programme; erosion to-

wards Level 1 would follow the complete collapse of the Fuegian assembly base.

### 3.2.2 Indicator 2.2 — System software autonomy

**Rating:** 2 — Aware. **Confidence:** High.

Argentina presents the canonical Level 2 pattern: policy recognition and demonstrated engineering capacity, without a funded national programme or measurable domestic share. There is explicit recognition of software sovereignty — the ONTI Public Software initiative, ONTI Disposition 2/2019 requiring code to be shared under open licences across the entire National Public Sector, and Santa Fe’s provincial law on the preferential use of free software<sup>56</sup> — and a bounded implementation footprint: a state GNU/Linux distribution (Huayra, developed at EDUCAR)<sup>57</sup>, a national public cloud on open-source code<sup>58</sup> and an ecosystem of official repositories (argob, 43 repositories)<sup>59</sup>. This satisfies the existence and implementation nodes, but no piece crosses the Level 3 thresholds.

Foreign dominance is overwhelming and quantified: the domestic desktop operating system is marginal (Windows 81.64%, total Linux 2.21%)<sup>60</sup>, the mobile

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- 51 AR-EV-0063: ‘La Law No. 27506 del Régimen de Promoción de la Economía del Conocimiento (publicada en el Boletín...’ Regulation. <https://servicios.infoleg.gob.ar/infolegInternet/anexos/320000-324999/324101/norma.htm>. Accessed 2026-05-29.
- 52 AR-EV-0068: ‘Los Lineamientos Estratégicos de Innovación, Ciencia y Tecnología 2025-2027, aprobados por...’ Policy. <https://www.argentina.gob.ar/ciencia/plan-nacional-cti/plan-cti>. Accessed 2026-05-29.
- 53 AR-EV-0064: ‘El Instituto Nacional de Tecnología Industrial (INTI), a través de su área de Micro y...’ CaseStudy. <https://www.inti.gob.ar/areas/desarrollo-tecnologico-e-innovacion/areas-de-conocimiento/micro-y-nanotecnologias>. Accessed 2026-05-29.
- 54 AR-EV-0061: ‘El Decree 333/2025, publicado en el Boletín Oficial el 20 de mayo de 2025, reduce a 8% el Derecho...’ Regulation. <https://www.boletinoficial.gob.ar/detalleAviso/primera/325601/20250520>. Accessed 2026-05-29.
- 55 AR-EV-0066: ‘El Grupo Mirgor adquirió en 2021 la operación de Brightstar en Tierra del Fuego, sumando a IATEC y...’ CaseStudy. <https://mirgor.com/mirgor-adquiere-brightstar-tierra-del-fuego/>. Accessed 2026-05-29.
- 56 AR-EV-0081: ‘La iniciativa de Software Público de la Subsecretaría de Gobierno Digital (ONTI, dependiente de...’ Policy. <https://argentina.gob.ar/jefatura/innovacion-publica/ssetic/onti/software-publico>. Accessed 2026-05-29.; AR-EV-0082: ‘La Disposición ONTI 2/2019 aprobó el Código de Buenas Prácticas para el desarrollo de software...’ Policy. <https://www.boletinoficial.gob.ar/detalleAviso/primera/206660/20190430>. Accessed 2026-05-29.; AR-EV-0083: ‘La Provincia de Santa Fe sancionó la Law No. 12360 el 15 de diciembre de 2004, reglamentada por...’ Regulation. <https://www.santafe.gob.ar/index.php/web/content/view/full/3601>. Accessed 2026-05-29.
- 57 AR-EV-0076: ‘Huayra GNU/Linux es el sistema operativo libre desarrollado en EDUCAR Sociedad del Estado, descrito...’ CaseStudy. <https://huayra.educar.gob.ar/>. Accessed 2026-05-29.
- 58 AR-EV-0079: ‘ARSAT desplegó la etapa 1 de la Nube Pública Nacional el 1° de abril de 2021, construida sobre...’ CaseStudy. <https://www.canal-ar.com.ar/29335-ARSAT-lanzo-la-Nube-Publica-Nacional-y-ofrece-infraestructura-y-servicios-a-demanda.html>. Accessed 2026-05-29.
- 59 AR-EV-0086: ‘La organización oficial ‘argob’ en GitHub aloja 43 repositorios; los más populares corresponden a...’ Data. <https://github.com/argob>. Accessed 2026-05-29.
- 60 AR-EV-0074: ‘El sistema operativo de escritorio dominante en Argentina al mes de abril de 2026 es Windows con...’ Data. <https://gs.statcounter.com/os-market-share/desktop/argentina>. Accessed 2026-05-29.

market is more than 99.97% foreign<sup>61</sup> and the database market is dominated by Oracle, SAP, Microsoft, and IBM, with effectively zero domestic share<sup>62</sup>. Decisively, ARSAT's own state cloud runs its network operations centre on Red Hat OpenShift — control software from a US provider<sup>63</sup> — so the control plane is not domestic: the physical location of the data centre does not equate to autonomy (Principle #7). The only domestic operating-system footprint (Huayra) was confined to the education sector and was suspended and intervened in the Milei era: the Conectar Igualdad and Educ.ar platforms were left in 'construction mode' and Decree 963/2024 appointed an intervenor for EDUC.AR S.E.<sup>64</sup>, downgrading that single case to symbolic status. Linux adoption is necessary but not sufficient, because its upstream is controlled from outside the country. It does not descend to Level 1 because a documented state distribution and a nationally scoped public-software regulation persist. Argentina is directly comparable to Brazil (Level 2) and remains a step below Russia (Level 3–4, with certified Astra Linux and sanctions-accelerated substitution). An ascent to Level 3 would require critical-infrastructure systems running on a domestic operating system with audited patching independence, or more than 5% domestic share in cloud, databases, or server operating systems.

### 3.2.3 Indicator 2.3 — Application software autonomy

**Rating:** 2 — Aware. **Confidence:** Medium.

Argentina presents the textbook Level 2 profile for this indicator: a capable software industry and genuine domestic dominance in several vertical categories, against complete foreign control of every horizontal category. On the vertical plane the evidence is strong and verified: Mercado Libre led national app downloads in 2024 (11.7 million)<sup>65</sup>, Mercado Pago surpassed 50 million monthly active users in Latin America with USD 8,600 million in revenue<sup>66</sup>, three domestic neobanks retain 88% of digital banking<sup>67</sup> and the State deploys self-authored citizen platforms at scale — Mi Argentina, with 21 million registered users<sup>68</sup>. On the horizontal plane, dependence is almost total and quantified: WhatsApp with 93% penetration in messaging, Instagram with 86.7%<sup>69</sup>, Google with 94.01% of searches<sup>70</sup>, and productivity, ERP, and CRM dominated by Microsoft, SAP, Oracle, and Salesforce with no domestic provider of measurable share<sup>71</sup>.

The decisive test of the indicator is horizontal share: an ascent to Level 3 requires  $\geq 30\%$  domestic share in at least one major horizontal category (office

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- 61 AR-EV-0075: 'El mercado de sistemas operativos móviles en Argentina al mes de abril de 2026 está dominado por...'. Data. <https://gs.statcounter.com/os-market-share/mobile/argentina>. Accessed 2026-05-29.
- 62 AR-EV-0084: 'El mercado latinoamericano de sistemas de gestión de bases de datos está dominado por Oracle...'. Data. <https://www.informesdeexpertos.com/informes/mercado-latinoamericano-de-sistemas-de-gestion-de-bases-de-datos>. Accessed 2026-05-29.
- 63 AR-EV-0080: 'ARSAT desplegó Red Hat OpenShift AI para apoyar operaciones de centro de operaciones de red (NOC)...'. CaseStudy. <https://www.redhat.com/en/success-stories/arsat>. Accessed 2026-05-29.
- 64 AR-EV-0077: 'In January 2024 the Milei government suspended access to Conectar Igualdad and Educ.ar —...'. CaseStudy. <https://www.ambito.com/politica/el-gobierno-bloqueo-las-plataformas-conectar-igualdad-y-educar-n5931668>. Accessed 2026-05-29.; AR-EV-0078: 'El Decree 963/2024, publicado en el Boletín Oficial el 31 de octubre de 2024, designa a Gastón...'. Regulation. <https://www.boletinoficial.gob.ar/detalleAviso/primera/316281/20241031>. Accessed 2026-05-29.
- 65 AR-EV-0098: 'Mercado Libre lideró el ranking de aplicaciones más descargadas en Argentina en 2024 con 11,7...'. CaseStudy. <https://mobiletime.la/noticias/23/01/2025/apps-mas-descargadas-2024/>. Accessed 2026-05-29.
- 66 AR-EV-0099: 'Mercado Pago superó los 50 millones de usuarios activos mensuales en LATAM en 2024 y reportó USD...'. Data. <https://investor.mercadolibre.com/>. Accessed 2026-05-29.
- 67 AR-EV-0101: 'El segmento de digital banking argentino está concentrado en tres jugadores domésticos: Ualá (6...'. Data. <https://fintechnews.am/fintech-argentina/52228/argentinas-top-3-digital-banks-capture-nearly-90-market-share/>. Accessed 2026-05-29.
- 68 AR-EV-0093: 'Mi Argentina, la plataforma de identidad digital ciudadana, supera los 21 millones de personas...'. CaseStudy. <https://www.argentina.gob.ar/noticias/se-renueva-mi-argentina-con-mas-y-mejores-servicios-para-la-ciudadania>. Accessed 2026-05-29.
- 69 AR-EV-0102: 'WhatsApp (Meta) tiene una penetración del 93% entre usuarios mayores de 16 años en Argentina, e...'. Data. <https://www.infobae.com/tecno/2025/04/04/radiografia-digital-que-hacen-los-argentinos-en-internet-y-en-que-redes-sociales-pasan-mas-tiempo/>. Accessed 2026-05-29.
- 70 AR-EV-0103: 'Google posee el 94,01% del mercado de búsquedas en Argentina a abril de 2026 (Bing 4,13%, Yahoo...'. Data. <https://gs.statcounter.com/search-engine-market-share/all/argentina>. Accessed 2026-05-29.
- 71 AR-EV-0107: 'No se identificó fuente Tier-1 que documente cifras consolidadas y auditables de participación de...'. Gap. Accessed 2026-05-29.

software, ERP, or industrial software). The Argentine shares above 30% are all in vertical categories — e-commerce, payments, digital banking — which the criterion explicitly excludes from the horizontal denominator. Policy is one of promotion, not substitution: Law No. 27506 sustains a service-export industry (USD 2,674 million in 2024, 46.9% to the United States)<sup>72</sup> rather than the substitution of horizontal products, and a domestic champion in a horizontal-adjacent category (Auth0, authentication) was acquired by the US firm Okta, reversing the sovereignty relationship (Principle #5)<sup>73</sup>. It does not descend to Level 1 because there are measurable domestic products, policy recognition and a substantive software industry. Argentina groups with the lower band of Brazil but below it, because Brazil has, in TOTVS, a domestic ERP provider with measurable horizontal share — exactly what Argentina lacks — and remains a level below Russia (Level 3, with 1C in ERP and My-Office in office software). An ascent to Level 3 would require a domestic provider to reach 30% share in a horizontal category or the public-procurement preference for nationally originated software to be applied with auditing.

### 3.2.4 Indicator 2.4 — Information security autonomy

**Rating:** 2 — Aware. **Confidence:** Low.

Argentina possesses a comparatively rich cybersecurity institutional architecture but fails the three substantive tests that separate Level 2 from Level 3. There is a national CERT in regulation (CERT.ar, Disposition 1/2021)<sup>74</sup>, operative on paper — it registered

438 incidents in 2024, 15% above 2023, with 61% in the state sector<sup>75</sup> — and internationally recognised through FIRST membership. The scope of that figure must be made explicit: CERT.ar's mandate is confined to the National Public Sector, within a deliberately federated incident-response architecture. Alongside it operate a second national-level team at the Ministry of Security and a network of sub-national centres — among them the BA-CSIRT of the Autonomous City of Buenos Aires, the CSIRT of the Province of Buenos Aires and that of the Province of Córdoba, several of them integrated into the OAS CSIRT Americas Network — each with its own jurisdiction and sectors. These teams do not aggregate into the national score of this indicator, which measures federal-level capacity; their existence, however, means that CERT.ar's register must not be read as an exhaustive count of the country's incident activity, but as the activity of the federal-level team. A layered regulatory regime governs the public sector: the PNICIC critical-infrastructure programme, minimum security requirements with a duty to notify the CERT within 48 hours (Administrative Decision 641/2021)<sup>76</sup>, a second National Cybersecurity Strategy and the reorganisation of Decreto (Decree) 941/2025 that creates the National Cybersecurity Centre and the Federal Cyberintelligence Agency<sup>77</sup>. But, by Principles #1 and #2, strategies, and constitutive instruments are activity, not measured effectiveness.

The triple test fails simultaneously: the CERT's capacity (438 total incidents — not 'major' — reported without standardised FIRST-type operational metrics — mean time to respond, severity classification, or a trace of advisories adopted; the count is a raw aggre-

72 AR-EV-0096: 'El sector argentino de software y servicios informáticos exportó USD 2.674 millones en 2024, un...' Data. <https://cessi.org.ar/2025/05/21/el-software-argentino-genero-mas-de-6-000-empleos-y-alcanzo-un-record-de-exportaciones/>. Accessed 2026-05-29.; AR-EV-0097: 'Argentina's Law No. 27506 (Régimen de Promoción de la Economía del Conocimiento), in force since 1...' Regulation. <https://www.argentina.gob.ar/normativa/nacional/ley-27506-324101/actualizacion>. Accessed 2026-05-29.

73 AR-EV-0104: 'Auth0, empresa argentina de autenticación digital fundada en 2013, fue adquirida en 2021 por Okta...' CaseStudy. <https://www.infobae.com/economia/2021/06/23/otra-tech-argentina-se-convirtio-en-unicornio-y-es-el-sexto-local-que-hace-y-quien-es-el-millennial-autodidacta-que-la-fundo/>. Accessed 2026-05-29.

74 AR-EV-0108: 'La Disposición 1/2021 de la Dirección Nacional de Ciberseguridad crea el Centro Nacional de...' Regulation. <https://www.boletinoficial.gob.ar/detalleAviso/primera/241077/20210222>. Accessed 2026-05-29.

75 AR-EV-0109: 'Durante 2024, el CERT.ar registró 438 incidentes de ciberseguridad, una cifra 15% superior a los...' Data. <https://www.argentina.gob.ar/jefatura/innovacion-ciencia-y-tecnologia/ciberseguridad/informes-de-la-direccion-nacional-de>. Accessed 2026-05-29.

76 AR-EV-0112: 'La Decisión Administrativa 641/2021 aprueba los Requisitos Mínimos de Seguridad de la Información...' Regulation. <https://servicios.infoleg.gob.ar/infolegInternet/anexos/350000-354999/351345/norma.htm>. Accessed 2026-05-29.

77 AR-EV-0114: 'Por Decree 941/2025 del Poder Ejecutivo (publicado el 2 de enero de 2026 en el Boletín Oficial) se...' Regulation. <https://www.boletinoficial.gob.ar/detalleAviso/primera/337032/20260102>. Accessed 2026-05-29.

gate that, moreover, reflects only the National Public Sector perimeter, and does not evidence the handling of major incidents with disclosed timelines)<sup>78</sup>; the market test (no measurable domestic share and no documented sovereign cryptographic research)<sup>79</sup>; and the product test (no verifiable domestic security product in critical infrastructure)<sup>80</sup>. Three major breaches of the period are reverse evidence that the regime does not protect: the leak of the national driver's-licence database (~5.7–6 million records, 1.25 TB, April 2024)<sup>81</sup>, the December 2024 defacement of Mi Argentina and SUBE — where the attackers reported the absence of two-factor authentication on central-government sites<sup>82</sup> — and the recurring RENAPER incidents<sup>83</sup>. Confidence is capped at Low because the evidence subset (14 items) falls below the sufficiency threshold and the corpus entirely lacks market-share data. It does not descend to Level 1 because CERT.ar exists in a constitutive instrument and registers incidents, and a substantive strategy is published and under active reform. Argentina sits at the lower edge of the Brazilian band (Level 2–3) and well below Russia (Level 4, with Kaspersky and the sovereign GOST cryptography). An ascent to Level 3 would require a public trace of major incidents with response times, a domestic security-product industry of measurable share, and a sovereign cryptographic regime applied in critical infrastructure.

**Intra-dimensional analysis.** The four indicators of Dimension 2 share a single bottleneck: the Dependence Penalty. Argentina recognises every dependence — it has Compre Argentino, Public Software, a thriving software industry and a CERT — but in each layer the real capacity is assembly (2.1), foreign upstream (2.2), vertical strength without horizontal substitu-

tion (2.3) or architecture without effectiveness (2.4). The symptomatic tension is that the dimension's most visible asset — the software industry — feeds service exports to foreign clients and champions that are acquired by US firms, so that engineering capacity does not translate into infrastructure autonomy. The uniformity of Level 2 is no coincidence: it is the hallmark of an economy that is a net integrator of every layer of the digital stack.

### Dimension 3 — Digital Governance Independence

Dimension 3 asks whether the country governs its digital space or is governed within others' rules, through legislative capacity, enforcement, and leadership in international rules. The institutional landscape includes the Congreso de la Nación (National Congress), the AAIP, and the competition authority (CNDC, succeeded by the National Competition Authority), IRAM in technical standards and the Cancillería (Ministry of Foreign Affairs) in multilateral fora. The dimension finding (average 2.00) combines two high-confidence profiles — legislative capacity and enforcement, both capped at Level 2 by a subtractive trajectory and symbolic enforcement — with two low-confidence profiles owing to insufficient evidence (3.3 and 3.4), both also at Level 2: international participation without leadership.

#### 3.3.1 Indicator 3.1 — Legislative capacity in digital matters

**Rating:** 2 — Aware. **Confidence:** High.

Argentina possesses a foundational but dated digital legal corpus: a cybercrime law (Law No. 26388, 2008),

78 AR-EV-0109: 'Durante 2024, el CERT.ar registró 438 incidentes de ciberseguridad, una cifra 15% superior a los...' Data. <https://www.argentina.gob.ar/jefatura/innovacion-ciencia-y-tecnologia/ciberseguridad/informes-de-la-direccion-nacional-de>. Accessed 2026-05-29.

79 AR-EV-0120: 'No se identificó fuente Tier-1 que documente investigación criptográfica argentina con publicación...' Gap. Accessed 2026-05-29.

80 AR-EV-0121: 'No se identificó capacidad documentada de ciberseguridad ofensiva soberana (red team gubernamental...)' Gap. Accessed 2026-05-29.

81 AR-EV-0116: 'En abril de 2024 se difundió en Telegram una base con datos de aproximadamente 5,7-6 millones de...' CaseStudy. <https://www.lanacion.com.ar/seguridad/la-venden-a-us-3700-hackearon-la-base-de-datos-nacional-de-licencias-de-conducir-y-muestran-las-de-nid16042024/>. Accessed 2026-05-29.

82 AR-EV-0117: 'El 25-26 de diciembre de 2024 los sitios oficiales Mi Argentina y la plataforma de la tarjeta SUBE...' CaseStudy. <https://www.infobae.com/politica/2024/12/26/lo-hicimos-por-diversion-los-hackers-que-atacaron-los-sitios-del-gobierno-dijeron-que-no-tenian-segundo-factor-de-autenticacion/>. Accessed 2026-05-29.

83 AR-EV-0119: 'El RENAPER detectó en 2021 el uso indebido de una clave otorgada a un organismo público (Ministerio...)' CaseStudy. <https://www.argentina.gob.ar/noticias/el-renaper-detecto-el-uso-indebido-de-una-clave-otorgada-un-organismo-publico-y-formalizo>. Accessed 2026-05-29.

electronic signature (Law No. 25506, 2001), grooming (Law No. 26904, 2013), a statute on internet-provider content (Law No. 25690, 2002) and the telecommunications framework (Law No. 27078, 2014)<sup>84</sup>, alongside a data-protection statute (Law No. 25326, 2000) never substantively modernised. On a static reading, this corpus sits at the high end of Level 2: the foundational statutes are pre-2015 in substance, the frontier domains (artificial intelligence, platforms, statutory cybersecurity) are governed by executive instruments or non-binding guidance<sup>85</sup>, and the modernisation bills remain pending without enactment<sup>86</sup>.

Decisively, the trajectory is subtractive. The Ministry of Deregulation accumulates 543 measures that modify or eliminate 2,519 norms across 15,144 articles — verified textually against the official source<sup>87</sup> — article 15 of Law No. 27.078 was repealed by decree in April 2024<sup>88</sup> and the national artificial-intelligence strategy was institutionally discontinued<sup>89</sup>. By the indicator's trajectory clause, a corpus under active dismantling cannot exceed Level 2 regardless of its historical base: this is the binding constraint, and it confirms Level 2 regardless of the static result of the decision tree. The indicator does not reach Level 3 because that would require at least one enacted —

not proposed — frontier statute plus a trace of legislative modernisation in the last five years, conditions that the deliberate deregulatory trajectory (Argentina articulated as a 'low-regulation hub' for AI)<sup>90</sup> renders unattainable. It does not descend to Level 1 because a genuine digital corpus is in force and the Budapest Convention and Convention 108+ have been incorporated. Against Brazil (Level 3, with the operative LGPD and an AI bill advancing), Argentina remains a level below precisely because its frontier bills do not advance to enactment and its existing corpus is being dismantled. The convergence with the BRICS 2025 rating (also Level 2) validates the reading. An ascent to Level 3 would require the enactment of a frontier statute (AI or platforms) and the cessation of the subtractive trajectory.

### 3.3.2 Indicator 3.2 — Enforcement capacity

**Rating:** 2 — Aware. **Confidence:** High.

Argentina has operative digital regulators with statutory sanctioning powers — the AAIP in data protection, the CNDC (replaced by the National Competition Authority on 17 November 2025) in competition, and the BCRA in financial cybersecurity — but enforce-

84 AR-EV-0122: 'La Law No. 26388 de Delitos Informáticos, sancionada el 4 de junio de 2008, incorporó al Código Penal...' Regulation. <https://www.argentina.gob.ar/normativa/nacional/ley-26388-141790/texto>. Accessed 2026-05-29.; AR-EV-0125: 'Law No. 25506 (2001) establishes the legal validity of digital and electronic signatures in Argentina...' Regulation. <https://servicios.infoleg.gob.ar/infolegInternet/anexos/70000-74999/70749/norma.htm>. Accessed 2026-05-29.; AR-EV-0126: 'Article 15 of Law No. 27078 — which had designated TIC services as 'essential and strategic public...' Regulation. <https://servicios.infoleg.gob.ar/infolegInternet/anexos/235000-239999/239771/texact.htm>. Accessed 2026-05-29.

85 AR-EV-0131: 'Resolución AAIP 161/2023 created the 'Programa de Transparencia y Protección de Datos Personales en...' Policy. <https://www.boletinoficial.gob.ar/detalleAviso/primera/293363/20230904>. Accessed 2026-05-29.; AR-EV-0134: 'Argentina lacks a horizontal platform-regulation statute. The intermediary-liability bill...' CaseStudy. <https://rest.hcdn.gob.ar/web/proyectos/290487/adjuntos/104934>. Accessed 2026-05-29.; AR-EV-0135: 'Argentina's cybersecurity-incident response framework rests on dispositions of the Dirección...' Regulation. <https://www.argentina.gob.ar/jefatura/innovacion-publica/direccion-nacional-ciberseguridad/normativa>. Accessed 2026-05-29.

86 AR-EV-0004: 'El Proyecto de Ley de Protección de Datos Personales presentado por el Poder Ejecutivo Nacional en...' Policy. <https://www.argentina.gob.ar/aaip/datospersonales/proyecto-ley-datos-personales>. Accessed 2026-05-29.; AR-EV-0178: 'A Personal Data Protection bill (HCDN 1948-D-2025) introduced in the Argentine Chamber of Deputies...' Analysis. <https://iapp.org/news/a/novedades-legislativas-en-argentina-sobre-proteccion-de-datos-personales-e-inteligencia-artificial>. Accessed 2026-05-29.

87 AR-EV-0133: 'The Ministerio de Desregulación y Transformación del Estado (created July 2024 under Federico...' Data. <https://www.argentina.gob.ar/desregulacion>. Accessed 2026-05-29.

88 AR-EV-0126: 'Article 15 of Law No. 27078 — which had designated TIC services as 'essential and strategic public...' Regulation. <https://servicios.infoleg.gob.ar/infolegInternet/anexos/235000-239999/239771/texact.htm>. Accessed 2026-05-29.

89 AR-EV-0139: 'The Argentina national AI ecosystem framework — the Plan Nacional de Inteligencia Artificial...' Report. <https://oecd-opsi.org/wp-content/uploads/2021/02/Argentina-National-AI-Strategy.pdf>. Accessed 2026-05-29.

90 AR-EV-0132: 'President Javier Milei has publicly positioned Argentina to compete as a 'low-regulation AI hub'...' CaseStudy. <https://chequeado.com/el-explicador/argentina-polo-de-inteligencia-artificial-que-propone-el-gobierno-de-javier-milei-y-que-chances-hay-de-que-suceda/>. Accessed 2026-05-29.

ment is symbolic rather than consequential. The AAIP's statutory fine scale runs from ARS 1,000 to ARS 100,000 (~USD 88–100 at its maximum)<sup>91</sup>, orders of magnitude below the GDPR's 4%-of-revenue standard; the largest sanction against a Big Tech firm ever imposed is the one against Google, for ARS 280,000 aggregated (~USD 215, 2020), equivalent to around 0.0001% of the offender's revenue<sup>92</sup>. The competition authority issued 89 merger-control decisions and a single procedural fine for late notification in 2024, with zero anticompetitive-conduct sanctions<sup>93</sup>.

The binding fact is the closure of the flagship case: the CNDC shelved the abuse-of-dominant-position investigation against WhatsApp and Meta on 2 July 2025 without a final sanction, after four years and two rounds of precautionary measures confirmed judicially<sup>94</sup>. A regulator that opened, litigated, and then abandoned its emblematic case against a foreign Big Tech firm without extracting any concession exemplifies the Level 2 ceiling. The indicator does not reach Level 3 because that requires at least one concluded enforcement action that produces documented behaviour change among the regulated, together with non-testimonial sanctions proportional to the infraction: the behaviour-change test is mandatory and fails resoundingly. It does not descend to Level 1 because the AAIP has concluded real monetary sanctions — even against a Big Tech firm — and the competition authority processes merger control at volume with professional staff. Argentina remains below Brazil (Level 2–3), whose CADE demonstrated the capacity to extract compliance even from foreign platforms (the X/Twitter episode), and well below China (Level

5, with the structural decisions against Alibaba and Didi). An ascent to Level 3 would require a concluded sanction with verifiable behaviour change and the updating of the fine cap to deterrent magnitudes.

### 3.3.3 Indicator 3.3 — Leadership in international technical rules

**Rating:** 2 — Aware. **Confidence:** Low.

Argentina is an active participant in international technical-standards bodies, with a genuine contribution but without leadership. It maintains its level of access through the general standards ecosystem — IRAM is the sole national representative before ISO and, together with CEA/AEA, before IEC, as well as a representative in the regional bodies COPANT and AMN<sup>95</sup> — and the country rejoined IEC in 2001. The strongest and verified contribution is that of Verónica Marinelli, of IRAM's SC 27 mirror committee, as one of three editors of the adopted international standard ISO/IEC 27002:202<sup>96</sup>; alongside her, editors from a single institution (UTN's Santa Fe Regional Faculty) act as editors of at least five Y-series Recommendation projects of the ITU-T's Study Group 20<sup>97</sup>.

But the concentration in a single institution and a single body is exactly what the criterion caps at Level 2: an isolated editor/rapporteur contribution — the lowest leadership level — does not cross the frontier to Level 3, which requires multi-body adoptions and a handful of leadership roles. The chair leadership level is verifiably absent: there is no Argentine vice-chair in the 2025–2028 leadership roster of the ITU-T's Study

91 AR-EV-0140: 'La Resolución AAIP 126/2024, en vigor desde el 1 de junio de 2024, aprueba el régimen sancionatorio...' Regulation. <https://www.boletinoficial.gob.ar/detalleAviso/primera/308122/20240524>. Accessed 2026-05-29.

92 AR-EV-0144: 'La AAIP sancionó a Google Argentina SRL y Google LLC mediante la Resolución 69/2020 por...' CaseStudy. <https://www.argentina.gob.ar/noticias/sancion-google-por-negar-el-derecho-de-acceso>. Accessed 2026-05-29.

93 AR-EV-0148: 'En 2024 la CNDC emitió 89 decisiones en control de concentraciones y una única multa por...' Data. <https://legalblogs.wolterskluwer.com/competition-blog/main-developments-in-competition-law-and-policy-2024-argentina/>. Accessed 2026-05-29.

94 AR-EV-0142: 'La Comisión Nacional de Defensa de la Competencia (CNDC) archivó el 2 de julio de 2025 la...' CaseStudy. <https://www.lanacion.com.ar/tecnologia/la-cndc-archivo-la-investigacion-contra-whatsapp-y-meta-por-presunto-abuso-de-posicion-dominante-nid08072025/>. Accessed 2026-05-29.

95 AR-EV-0158: 'IRAM (Instituto Argentino de Normalización y Certificación), founded in 1935, is Argentina's sole...' Report. <https://www.iram.org.ar/en/who-we-are/>. Accessed 2026-05-29.

96 AR-EV-0162: 'Verónica Marinelli, coordinator of IRAM's Subcommittee on Information Security, Cybersecurity, and...' CaseStudy. <https://www.iram.org.ar/novedades/novedades-en-seguridad-de-la-informacion/>. Accessed 2026-05-29.

97 AR-EV-0160: 'Editors from Universidad Tecnológica Nacional (UTN, Santa Fe Regional Faculty) serve as editor, or...' CaseStudy. <https://uit.frsf.utn.edu.ar/>. Accessed 2026-05-29.

Group 20<sup>98</sup>, nor any Argentine organisation among the 329 members of the W3C<sup>99</sup> — Argentina is a rule-taker in web protocols. The regional engagement (chair of CITELE's Steering Committee in 2018) is real but, by Pitfall #5, regional harmonisation is categorically distinct from global rule-making and does not raise the global rating<sup>100</sup>. Confidence is capped at Low because the corpus lost around ten candidate items to verification failures and ended up at 11 items, below the sufficiency threshold. Argentina groups with the Brazilian anchor (Level 2): both are regional leaders with limited global presence. An ascent to Level 3 would require contributions adopted in multiple bodies by multiple institutions, plus leadership roles above the editor level.

### 3.3.4 Indicator 3.4 — Leadership in international conduct rules

**Rating:** 2 — Aware. **Confidence:** Low.

Argentina is a recurrent and substantive participant in the main arenas of international digital governance — the UN Open-Ended Working Group on ICT security, the Ad Hoc Committee that produced the Convention on Cybercrime, the Council of Europe's Convention 108 system and regional internet-governance fora — but the evidence shows participation without independent agenda-setting. The strongest signal, the election of Beatriz Anchorena to chair the Council of Europe's Convention 108 Committee<sup>101</sup>, is a genuine credential of treaty engagement, but it is a rotating institutional chairmanship over an instrument anchored in the European Union that advances

the Council of Europe's own work programme, not a doctrine of Argentine origin adopted by other States. The interventions in the Working Group were carried out explicitly 'without co-sponsoring substantive thematic resolutions'<sup>102</sup>.

Decisively, a domestic-international coherence failure undermines any claim to independent normative leadership: a data-protection bill with extraterritorial scope and anti-CLOUD Act provisions (1948-D-2025) runs contemporaneously with the Framework Agreement that grants the United States data-adequacy status<sup>103</sup> — Argentina advocates data sovereignty while conceding it. The indicator does not reach Level 3 because that requires co-sponsorship of a substantive instrument with documented impact on the final text, visible independent positioning, and domestic-international coherence, and the surviving evidence satisfies none of these. As to the Argentine withdrawal from the Pact for the Future and the Global Digital Compact, it is treated qualitatively as dissent-without-alternative — Level 2 positioning, not Level 3 leadership — without reproducing the specific date or cohort, whose evidentiary carrier was removed by the verifier. It does not descend to Level 1 because Argentina is an active participant of substance, with recurrent delegations and a treaty-committee chairmanship. Against Brazil (Level 3, with NETmundial 2014 and sustained leadership in the IGF), Argentina remains just below, at the upper edge of Level 2, for lacking a flagship convened process and for exhibiting the incoherence that Brazil does not show. An ascent to Level 3 would require a co-sponsored instrument

98 AR-EV-0161: 'The official ITU-T Study Group 20 management roster for the 2025-2028 study period (period 18)...' Data. <https://www.itu.int/net4/ITU-T/lists/mgmt.aspx?Group=20&Period=18>. Accessed 2026-05-29.

99 AR-EV-0168: 'No organisation domiciled in Argentina appears among the 329 (as of May 2026) Member organisations...' Gap. <https://www.w3.org/membership/list/>. Accessed 2026-05-29.

100 AR-EV-0163: 'Argentina was elected President of CITELE's Steering Committee (COM/CITELE) at the VII CITELE Assembly...' Report. <https://www.argentina.gob.ar/jefatura/innovacion-publica/ssetic/citel>. Accessed 2026-05-29.

101 AR-EV-0171: 'In November 2024 Beatriz Anchorena, head of Argentina's Access to Public Information Agency (AAIP)...' CaseStudy. <https://www.argentina.gob.ar/noticias/beatriz-anchorena-titular-de-la-aaip-fue-electa-presidenta-del-comite-del-convenio-108-del>. Accessed 2026-05-29.

102 AR-EV-0170: 'Argentina participated in the second cycle of the UN Open-Ended Working Group (OEWG) on Security of...' Report. <https://www.argentina.gob.ar/noticias/argentina-participo-en-naciones-unidas-de-un-grupo-de-trabajo-sobre-tic-y-seguridad>. Accessed 2026-05-29.

103 AR-EV-0178: 'A Personal Data Protection bill (HCDN 1948-D-2025) introduced in the Argentine Chamber of Deputies...' Analysis. <https://iapp.org/news/a/novedades-legislativas-en-argentina-sobre-proteccion-de-datos-personales-e-inteligencia-artificial>. Accessed 2026-05-29.; AR-EV-0169: 'On 5 February 2026 the Argentine Foreign Ministry announced the signature of the United...' Policy. <https://www.cancilleria.gob.ar/es/actualidad/noticias/argentina-y-estados-unidos-firmaron-un-acuerdo-sobre-comercio-e-inversiones>. Accessed 2026-05-29.

with documented influence and the resolution of the domestic–international incoherence.

**Intra-dimensional analysis.** Dimension 3 exposes a coherent internal hierarchy: legislative capacity (3.1) exceeds enforcement (3.2) in its historical base, but both are capped at Level 2 for distinct reasons — a subtractive trajectory in 3.1, the absence of deterrent effect in 3.2 — satisfying the cross-cutting consistency rule that requires enforcement  $\leq$  legislation. International leadership (3.3 and 3.4) remains at participation without influence, consistent with the rule that requires influence in international rules  $\leq$  domestic R&D capacity. The common bottleneck is that Argentina possesses real institutions that operate within others' rules: it legislates but dismantles, it enforces but does not deter, it participates but does not lead. The domestic–international incoherence of 3.4 — advocating data sovereignty while conceding US adequacy — is the dimension's sharpest cross-cutting symptom.

#### Dimension 4 — Digital Capacity Independence

Dimension 4 analyses whether the country has the human, scientific, and industrial capacity to sustain digital sovereignty across generations, along four indicators: frontier research, university talent, industrial engineering, and strategic alignment. The institutional landscape includes CONICET, the free public university system, the MinCyT/Secretariat of Science, and Technology, and the software industry. The dimension finding (average 2.25) makes it Argentina's highest, sustained entirely by industrial engineering

(4.3, the dimension's only Level 3); the other three indicators remain at Level 2, cut across by the fiscal collapse of the period.

##### 3.4.1 Indicator 4.1 — Frontier-technology research

**Rating:** 2 — Aware. **Confidence:** Medium.

Argentina possesses genuine institutional infrastructure for frontier digital research: CONICET, the first governmental scientific institution in Latin America, and the twentieth in the world among governmental research bodies<sup>104</sup>; a CNEA-CONICET superconducting-qubit programme (QUANTEC)<sup>105</sup>; a sovereign high-performance computing facility (Clementina XXI, 15.3 PFLOPs, ranked 82nd in the TOP500)<sup>106</sup>; and budgeted quantum-infrastructure calls<sup>107</sup>. What it does not possess is the binding condition that Level 3 requires: sustained presence in top-tier global venues (NeurIPS, ICML, ICLR) at a non-trivial volume over a five-year window. Argentina's aggregate output at these venues is documented as low and dependent on foreign co-authorship<sup>108</sup>.

The existing artefacts are below the 'more than a prototype' threshold: QUANTEC targets 4–6 qubits, with coherent manipulation still a goal for 2025<sup>109</sup>, and Clementina XXI is an acquired Lenovo cluster, a sovereign capacity but not a domestically designed artefact. The decisive modifier is a verified downward fiscal trajectory: R&D investment fell to 0.216% of GDP in 2024, a real decline of 31.3% and 55.4% below the 0.39% mandated by Law No. 27614 for that fiscal year<sup>110</sup>, with that law's progressivity articles suspend-

104 AR-EV-0191: 'En el Ranking Scimago Institutions 2024, CONICET figura como la principal institución gubernamental...' Report. <https://www.scimagoir.com/rankings.php?country=ARG>. Accessed 2026-05-29.

105 AR-EV-0187: 'El proyecto QUANTEC del Grupo de Circuitos Cuánticos del Centro Atómico Bariloche (CNEA-CONICET)...' CaseStudy. <https://www.argentina.gob.ar/noticias/cientificos-del-centro-atomico-bariloche-buscan-crear-un-procesador-cuantico-con-circuitos>. Accessed 2026-05-29.

106 AR-EV-0186: 'Clementina XXI, supercomputadora adquirida por Argentina vía Iniciativa Nacional de Supercómputo...' CaseStudy. <https://www.argentina.gob.ar/noticias/argentina-pone-en-funcionamiento-la-supercomputadora-clementina-xxi>. Accessed 2026-05-29.

107 AR-EV-0188: 'La convocatoria 2023 de Proyectos de Fortalecimiento de Infraestructura Experimental en CyT...' Policy. <https://www.argentina.gob.ar/ciencia/financiamiento/fort-exper-cytcuanticas-2023>. Accessed 2026-05-29.

108 AR-EV-0193: 'Existen grupos argentinos publicando trabajos de aprendizaje automático y visión por computadora...' Analysis. <https://scholar.google.com/citations?user=ArqlkTUAAA&hl=en>. Accessed 2026-05-29.

109 AR-EV-0187: 'El proyecto QUANTEC del Grupo de Circuitos Cuánticos del Centro Atómico Bariloche (CNEA-CONICET)...' CaseStudy. <https://www.argentina.gob.ar/noticias/cientificos-del-centro-atomico-bariloche-buscan-crear-un-procesador-cuantico-con-circuitos>. Accessed 2026-05-29.

110 AR-EV-0181: 'Argentina's R&D investment fell to 0.216% of GDP in 2024, the lowest historical figure on record...' Data. <https://periferia.com.ar/indicios/la-inversion-en-ciencia-y-tecnologia-llego-a-su-mayor-deterioro-historico-en-2024/>. Accessed 2026-05-29.

ed<sup>111</sup>. By Pitfall #3, the rating reflects the downward trajectory, not the inherited institutional stock. It does not descend to Level 1 because CONICET operates a substantive research community and there are funded programmes and sovereign HPC. Argentina remains a level below Brazil (Level 3), whose differential is a longer trajectory of sustained investment; the 2024 fiscal collapse sharpens the gap rather than narrowing it. An ascent to Level 3 would require sustained presence in top-tier venues and a funding trajectory that is at least stable.

### 3.4.2 Indicator 4.2 — University talent development

**Rating:** 2 — Aware. **Confidence:** Low.

Argentina operates a free and recognised university system that produces digital-technology graduates at a measurable but modest and declining volume, has no university among the world's top 500 in computer science, and loses its most capable graduates to foreign labour markets through a structurally selective brain drain. The production system exists; the retention system has failed. The base is real: close to 6,500 engineering graduates per year nationally, with UTN producing 42.75%<sup>112</sup>, and specialised postgraduate programmes in data science, and artificial intelligence emerging in several universities<sup>113</sup>. A State policy for repatriating the diaspora (RAICES) and pipeline programmes (Sadosky, Numéricas) evidence recognition of talent as a strategic asset<sup>114</sup>.

But the indicator does not reach Level 3 for four reasons. No Argentine university appears in the global top 500 in computer science (UBA at 555th)<sup>115</sup>. The production of computer-science graduates is small and decreasing (a decline of 23.68% in the 2010–2019 decade). The brain drain is the dominant structural pattern: Argentina is among the 30 largest emitters of highly qualified talent, with close to 30,000 scientists and engineers in the United States alone, and the service-export model rents domestic talent to foreign clients via remote work<sup>116</sup>. And the fiscal trajectory collapses: science-and-technology investment around 0.2% of GDP (the level of the 2002 crisis) and CONICET doctoral scholarships cut by around 30% in 2024<sup>117</sup>. Confidence is capped at Low because the emigration rate specific to computer-science doctorates cannot be substantiated with Tier-1 sources and is sealed as a gap. It does not descend to Level 1 because the pipeline is operative and measurable. Argentina remains a level below Brazil (Level 3), whose sustained investment is the multi-year differential. An ascent to Level 3 would require a university in the top 200 in a digital discipline and the control of brain drain below the operational threshold.

### 3.4.3 Indicator 4.3 — Industrial engineering capacity

**Rating:** 3 — Developing. **Confidence:** High.

Argentina sits firmly at Level 3 in industrial engineering capacity. The industry has substantive scale: software-industry revenue reached USD 22,221 million in

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- 111 AR-EV-0182: 'Law No. 27614 (Ley de Financiamiento del Sistema Nacional de Ciencia, Tecnología e Innovación...' Regulation. <https://www.iaede.org.ar/noticias/ley-de-financiamiento-del-sistema-nacional-de-ciencia-tecnologia-e-innovacion-en-argentina>. Accessed 2026-05-29.
- 112 AR-EV-0198: 'Universidad Tecnológica Nacional (UTN) produce 42.75% of Argentina's engineering graduates...' Data. <https://frba.utn.edu.ar/dia-de-la-ingenieria-la-utn-forma-mas-del-40-de-los-ingenieros-que-se-graduan-en-el-pais/>. Accessed 2026-05-29.
- 113 AR-EV-0198: "'Universidad Tecnológica Nacional (UTN) produce 42.75% of Argentina's engineering graduates...'" Data. <https://frba.utn.edu.ar/dia-de-la-ingenieria-la-utn-forma-mas-del-40-de-los-ingenieros-que-se-graduan-en-el-pais/>. Accessed 2026-05-29.
- 114 AR-EV-0203: 'The RAICES Programme (Red de Argentinos Investigadores y Científicos en el Exterior), created in...' Policy. <https://www.argentina.gob.ar/ciencia/seppcti/raices>. Accessed 2026-05-29.
- 115 AR-EV-0207: 'In the EduRank Latin America Computer Science ranking, UBA is #1 in Argentina, and #555 worldwide...' Data. <https://edurank.org/cs/la/>. Accessed 2026-05-29.
- 116 AR-EV-0200: 'Argentina is in the top 30 nations with highly-skilled emigrants according to OECD data, with...' Data. <https://www.untref.edu.ar/mundountref/argentina-se-convirtio-en-un-polo-de-emigracion>. Accessed 2026-05-29.; AR-EV-0202: 'Argentine remote workers for foreign employers earn between USD 2,500 and USD 5,000 per month on...' Data. <https://www.infobae.com/economia/2024/09/15/los-argentinos-que-trabajan-para-el-exterior-ganan-entre-2500-y-5000-dolares-por-mes/>. Accessed 2026-05-29.
- 117 AR-EV-0197: 'Argentina's 2025 budget projects Science and Technology investment at approximately 0.2% of GDP —...' Data. <https://periferia.com.ar/indicios/el-presupuesto-2025-deja-la-inversion-en-ciencia-y-tecnologia-al-nivel-del-2002/>. Accessed 2026-05-29.; AR-EV-0196: 'In 2024 CONICET cut doctoral scholarship allocations by approximately 30%, awarded 950 scholarships...' Policy. <https://www.scidev.net/americas-latinas/news/mas-becas-en-un-clima-incierto-para-hacer-ciencia-en-argentina/>. Accessed 2026-05-29.

2024 (+13.1% year-on-year) with 158,179 registered jobs<sup>118</sup>, and more than 140,000 formal sector employees exceed the automotive, oil, and mining industries combined<sup>119</sup>. Software and IT-service exports reached a record USD 2,674 million in 2024 and the knowledge-based-services export complex was USD 8,047 million in 2022<sup>120</sup>, placing Argentina second in Latin America among software exporters. At least one sub-sector is internationally competitive: fintech, where three domestically headquartered digital banks (Ualá, Brubank, Naranja X) retain 88% of the digital-banking market with 16.44 million clients<sup>121</sup>, and where the 2024 venture-capital rounds were led by fintech<sup>122</sup>. This comfortably exceeds Level 2: it is a real industry of products and services with domestically headquartered firms of national consequence. Argentina has produced **more than a dozen unicorn-scale companies** over the past decade, of which Auth0 — built by Argentine engineers and sold to the US firm Okta for some USD 6,500 million in 2021 — is the emblematic surviving case in the verified corpus<sup>123</sup>.

But the configuration falls decidedly short of Level 4 owing to five verified structural limits. First, the export base is skewed towards services with a thin product layer: in the 2022 mix, software was 33%, professional services 30%, architecture and engineering 22%, and R&D only 8%<sup>124</sup>, and the sector 'tends more towards development than research'<sup>125</sup>. Second, the dominant exit pattern is foreign acquisition at the growth stage, not independent scaling: the Auth0 → Okta case is the canonical pattern of the migration of intellectual property and decision rights abroad<sup>126</sup>. Third, Argentina loses global market share — from 0.6% of world software sales in 2011 to 0.3% in 2021<sup>127</sup>. Fourth, the capital base is fragile: venture capital fell from a peak of USD 1,337 million in 2021 to USD 412 million in 2024<sup>128</sup>. Fifth, there is no autonomy of the foundational layer: the largest announced technology investment is the OpenAI/Sur Energy data centre under the RIGI — foreign hyperscaler capacity settled in the territory, not domestic cloud or foundational-model capacity<sup>129</sup>. By Principle #4, an industry

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- 118 AR-EV-0212: 'Argentina's software industry reached USD 22,221 million in revenue in 2024 (+13.1% interannual)...' Data. <https://www.itsitio.com/ar/software/software-argentino-bate-records/>. Accessed 2026-05-29.
- 119 AR-EV-0222: 'Argentina's software industry employs more than 140,000 people formally — exceeding employment in...' Report. <https://fund.ar/publicacion/introduccion-a-la-industria-del-software/>. Accessed 2026-05-29.
- 120 AR-EV-0096: 'El sector argentino de software y servicios informáticos exportó USD 2.674 millones en 2024, un...' Data. <https://cessi.org.ar/2025/05/21/el-software-argentino-genero-mas-de-6-000-empleos-y-alcanzo-un-record-de-exportaciones/>. Accessed 2026-05-29.; AR-EV-0214: 'In 2022 Argentine SBC exports were USD 8,047 million, with software making up 33%, professional...' Data. <https://argendata.fund.ar/topico/servicios-basados-en-el-conocimiento/>. Accessed 2026-05-29.
- 121 AR-EV-0101: 'El segmento de digital banking argentino está concentrado en tres jugadores domésticos: Ualá (6...' Data. <https://fintechnews.am/fintech-argentina/52228/argentinas-top-3-digital-banks-capture-nearly-90-market-share/>. Accessed 2026-05-29.
- 122 AR-EV-0218: 'Argentine startups raised USD 412 million across 62 funding rounds in 2024 (46 seed rounds at USD...' Data. <https://www.lanacion.com.ar/economia/negocios/los-emprendedores-argentinos-levantaron-mas-de-us412-millones-en-2024-nid11062025/>. Accessed 2026-05-29.
- 123 AR-EV-0217: 'Auth0 — co-founded in 2013 by Argentine engineers Eugenio Pace (ITBA) and Matías Woloski...' CaseStudy. <https://www.roadshow.com.ar/como-nacio-auth0-el-unicornio-argentino-que-se-vendio-en-us-6500-millones/>. Accessed 2026-05-29.
- 124 AR-EV-0214: 'In 2022 Argentine SBC exports were USD 8,047 million, with software making up 33%, professional...' Data. <https://argendata.fund.ar/topico/servicios-basados-en-el-conocimiento/>. Accessed 2026-05-29.
- 125 AR-EV-0220: 'Within Argentina's R&D ecosystem the software industry accounts for 14% of total business R&D...' Data. <https://www.argentina.gob.ar/noticias/el-potencial-de-id-en-sectores-productivos-de-la-economia-del-conocimiento-software-y-ag-0>. Accessed 2026-05-29.
- 126 AR-EV-0217: 'Auth0 — co-founded in 2013 by Argentine engineers Eugenio Pace (ITBA) and Matías Woloski...' CaseStudy. <https://www.roadshow.com.ar/como-nacio-auth0-el-unicornio-argentino-que-se-vendio-en-us-6500-millones/>. Accessed 2026-05-29.
- 127 AR-EV-0215: 'Argentina has been losing global software-export market share — from 0.6% of global sales in 2011...' Analysis. <https://www.lanacion.com.ar/economia/despertar-el-potencial-de-la-industria-del-software-una-estrategia-para-el-futuro-nid14082024/>. Accessed 2026-05-29.
- 128 AR-EV-0218: 'Argentine startups raised USD 412 million across 62 funding rounds in 2024 (46 seed rounds at USD...' Data. <https://www.lanacion.com.ar/economia/negocios/los-emprendedores-argentinos-levantaron-mas-de-us412-millones-en-2024-nid11062025/>. Accessed 2026-05-29.
- 129 AR-EV-0219: 'Law No. 27742 'Bases y Puntos de Partida para la Libertad de los Argentinos' (sanctioned July 2024)...' Policy. <https://chequeado.com/el-explicador/openai-invertira-us-25-000-millones-en-un-data-center-para-ia-en-la-argentina-las-claves-del-anuncio/>. Accessed 2026-05-29.

built on foreign cloud, models and design tools is engineering capacity deployed on others' rails. Argentina sits on a par with Russia and Brazil (both Level 3) and well below China (Level 5); the differential with Brazil is precisely the Argentine capital fragility. An ascent to Level 4 would require service-product parity, autonomy of the foundational layer, a domestic venture-capital ecosystem at scale, and independent scaling without foreign-acquisition pressure.

#### 3.4.4 Indicator 4.4 — Alignment with national strategy

**Rating:** 2 — Aware. **Confidence:** Medium.

Argentina possesses an abundant and sophisticated catalogue of digital and science-and-technology strategy instruments at the highest level of government: the National Science, Technology, and Innovation Plan 2030 enacted by Law No. 27738<sup>130</sup>, the Digital Agenda 2030 by decree<sup>131</sup>, the Strategic Guidelines 2025–2027<sup>132</sup>, a National Artificial Intelligence Plan, and an inter-ministerial AI roundtable spanning ten jurisdictions<sup>133</sup>. On the axis of the strategy document, the country is comprehensive. But on each execution axis that the indicator measures — budget alignment,

statutorily funded coordination, indicator tracking, and continuity across administrations — the evidence shows symbolic strategy without execution.

The AI roundtable was created 'without its own budget allocation'<sup>134</sup> and the National AI Plan lacks a budget; the only funding dedicated to AI is an external IDB loan of USD 35 million<sup>135</sup>, which by Principle #4 is execution driven by an external lender, not domestic strategic alignment. The science-and-technology budget function fell 50.6% in cumulative real terms across 2024–2026<sup>136</sup>, the national budget has been carried over for two consecutive years<sup>137</sup> and the flagship programmes are cancelled, and relaunched cyclically — Conectar Igualdad was created, suspended, relaunched, restored, and defunded across four administrations<sup>138</sup>; the MinCyT was created, downgraded, restored, and downgraded again<sup>139</sup>. The governing strategic posture is active deregulation (DNU 70/2023, which repealed or modified 366 norms, including Law No. 27078 Argentina Digital)<sup>140</sup> framed within an ambition to be a 'low-regulation hub'<sup>141</sup>, which Principle #7 treats as hegemonic alignment, not as a sovereignty strategy. The indicator does not reach Level 3 because that requires a budget partially

130 AR-EV-0225: 'La Law No. 27738, sancionada el 10 de octubre de 2023 y publicada en el Boletín Oficial el 23 de...' Regulation. <https://www.boletinoficial.gob.ar/detalleAviso/primera/296574/20231023>. Accessed 2026-05-29.

131 AR-EV-0230: 'La Agenda Digital 2030 fue presentada por el gobierno de Mauricio Macri el 5 de noviembre de 2018...' Policy. <https://www.argentina.gob.ar/noticias/el-gobierno-presento-la-nueva-agenda-digital-2030>. Accessed 2026-05-29.

132 AR-EV-0226: 'La Resolución 282/2025 de la Secretaría de Innovación, Ciencia y Tecnología (Jefatura de Gabinete)...' Regulation. <https://www.boletinoficial.gob.ar/detalleAviso/primera/333751/20251031>. Accessed 2026-05-29.

133 AR-EV-0227: 'La Decisión Administrativa 899/2024, publicada el 24 de septiembre de 2024, crea la Mesa...' Regulation. <https://www.boletinoficial.gob.ar/detalleAviso/primera/314465/20240924>. Accessed 2026-05-29.

134 AR-EV-0227: 'La Decisión Administrativa 899/2024, publicada el 24 de septiembre de 2024, crea la Mesa...' Regulation. <https://www.boletinoficial.gob.ar/detalleAviso/primera/314465/20240924>. Accessed 2026-05-29.

135 AR-EV-0229: 'El Banco Interamericano de Desarrollo aprobó en 2023 un préstamo por USD 35 millones a Argentina...' CaseStudy. <https://www.argentina.gob.ar/noticias/nuevo-programa-de-35-millones-de-dolares-para-el-desarrollo-de-la-inteligencia-artificial>. Accessed 2026-05-29.

136 AR-EV-0235: 'La Función Ciencia y Tecnología del Presupuesto Nacional cayó un 11,4% adicional en el primer...' Data. <https://ciicti.org/el-2026-llego-con-mas-recortes-presupuestarios-a-la-ciencia-argentina/>. Accessed 2026-05-29.

137 AR-EV-0240: 'El Poder Legislativo no sancionó la Ley de Presupuesto Nacional 2025: el Decree 425/2025 y la...' Data. <https://chequeado.com/el-explicador/presupuesto-2025-las-5-claves-para-entender-la-prorroga-definida-por-el-gobierno-de-javier-milei/>. Accessed 2026-05-29.

138 AR-EV-0236: 'El programa Conectar Igualdad —creado en 2010 por Decree 459/10, suspendido durante la...' CaseStudy. <https://palabrasdelderecho.com.ar/articulo/5007/Prorrogaron-la-vigencia-del-Programa-Conectar-Igualdad-por-dos-meses>. Accessed 2026-05-29.

139 AR-EV-0234: 'El Ministerio de Ciencia, Tecnología e Innovación fue creado por Decree 21/2007 bajo la...' CaseStudy. [https://es.wikipedia.org/wiki/Ministerio\\_de\\_Ciencia,Tecnolog%C3%ADa\\_e\\_Innovaci%C3%B3n\(Argentina\)](https://es.wikipedia.org/wiki/Ministerio_de_Ciencia,Tecnolog%C3%ADa_e_Innovaci%C3%B3n(Argentina)). Accessed 2026-05-29.

140 AR-EV-0232: 'El Decreto de Necesidad y Urgencia 70/2023, emitido el 20 de diciembre de 2023, declaró la...' Regulation. <https://www.boletinoficial.gob.ar/detalleAviso/primera/301122/20231221>. Accessed 2026-05-29.

141 AR-EV-0237: 'El gobierno argentino articula públicamente la ambición de convertir al país en 'uno de los cuatro...' Policy. <https://www.telesemana.com/blog/2024/12/02/argentina-trabaja-en-desregulacion-energia-y-analisis-de-marcos-normativos-para-convertirse-en-el-hub-de-la-inteligencia-artificial-de-sudamerica/>. Accessed 2026-05-29.

aligned with the priorities, coordination operating with funded decisions and sustained execution across at least one complete administrative mandate: the budget-alignment and continuity tests both fail. It does not descend to Level 1 because statutory-level strategies and a coordination architecture exist on paper. Argentina mirrors Brazil's Level 2 through the same mechanism (political discontinuity) but in more acute form. An ascent to Level 3 would require a budget effectively aligned with strategy and the cessation of the cyclical-cancellation pattern.

**Intra-dimensional analysis.** Dimension 4 shows a broken synergy: Argentina has real human and in-

dustrial capacity (4.1, 4.2, 4.3) and abundant strategy (4.4), but the period's fiscal collapse disarticulates them. Industrial engineering (4.3) sustains the dimension at Level 3, but its own ceiling — foundational-layer dependence, capital flight and talent flight — refers directly back to the weaknesses of 4.1 and 4.2. The explicit cross-cutting contradiction is that the AI strategy depends on a stock of university and research capacity that the same budget cuts are depleting, leaving the country, in the words of the evidence itself, as a data-centre operator rather than an AI innovator<sup>142</sup>. The consistency rule that requires capacity  $\leq$  infrastructure is satisfied: Dimension 4's capacity does not exceed Dimension 2's infrastructure, both

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142 AR-EV-0238: "La fundación Fundar argumenta que la estrategia de IA del gobierno Milei tiene un 'talón de...'" Analysis. <https://fund.ar/publicacion/la-estrategia-de-milei-en-inteligencia-artificial-tiene-un-talon-de-aquiles/>. Accessed 2026-05-29.

## Chapter 4 — Cross-cutting Findings

### 4.1 Synthesis by dimension

The dimension-by-dimension reading reveals a country of uneven but internally coherent digital sovereignty. **Dimension 1 (1.75)** is the weakest: the historical legislative asset (1.1) does not prevent the simultaneous collapse of flow protection (1.3) and value capture (1.4) to Level 1. **Dimension 2 (2.00)** exhibits uniform awareness without substantive capacity: all four indicators at Level 2, cut across by the Dependency Penalty that the framework declares dominant for infrastructure. **Dimension 3 (2.00)** combines operative institutions with the absence of deterrent effect (3.2) and of international leadership (3.3, 3.4), its legislative capacity (3.1) capped by the subtractive trajectory. **Dimension 4 (2.25)**, the highest, rests entirely on the software industry (4.3); its other three indicators remain at Level 2 owing to the period’s fiscal collapse.

### 4.2 Horizontal comparison: AR against CN, RU, BR

The DSI framework anchors horizontal consistency against China, Russia, and Brazil. Across the set of sixteen indicators, **Argentina groups consistently with Brazil**, sits systematically below Russia, and is at a wide structural distance from China. China operates as the ceiling in every dimension — an exporting and expanding legislative corpus, a domestic hardware and software ecosystem, international agenda-setting, and global industrial champions — sitting around Level 5 in most indicators. Russia occupies a Level 3–4 band, with sanctions-forced substitution that produced domestic foundational layers (Astra Linux, Yandex, GOST cryptography) that Argentina does not possess. Brazil is the closest comparator: both countries share transplanted data-protection regimes, Level 3 software and fintech industries, hyperscaler dependence in infrastructure, and regional participation without global leadership.

The key distinction between Argentina and Brazil is instructive. Brazil surpasses Argentina in three precise indicators: it has, in TOTVS, a domestic ERP provider with horizontal share (2.3), it advances an AI

bill towards enactment (3.1) and it exhibits enforcement capacity that extracts compliance from foreign platforms (3.2). Argentina, in turn, retains an asset that Brazil does not have in the same form: the 2003 European adequacy and an older data-protection regime (1.1). But the decisive divergence is direction: where Brazil builds, Argentina — in the assessment period — dismantles. That directionality is what, via the trajectory clause (3.1) and Principle #7 (1.3), separates Argentina from the Level 3 band that Brazil reaches in several indicators.

**Table 4.1.** Approximate comparative positioning by dimension.

Dimension	AR	BR	RU	CN
1 — Data	1.75	≈2	≈3-4	≈5
2 — Infrastructure	2.00	≈2	≈3	≈5
3 — Governance	2.00	≈3	≈3-4	≈5
4 — Capacity	2.25	≈3	≈3	≈5

### 4.3 The computation of the sovereignty score

The digital sovereignty score is computed as the arithmetic mean of the sixteen indicator ratings on the 1–5 scale; the total is the sum of the sixteen ratings, with a maximum of 80. Argentina totals 32 out of 80, which yields a score of 2.00 / 5.0. The computation is transparent and consistent with the dimension averages:  $(1.75 + 2.00 + 2.00 + 2.25) / 4 = 2.00$ . The dimension that drags the score down most is Dimension 1 (data ownership), owing to its two indicators at Level 1; the one that most sustains it is Dimension 4, owing to the only Level 3 of industrial merit (4.3). The cross-cutting consistency check is satisfied on all its axes: enforcement (3.2, Level 2) does not exceed legislation (3.1, Level 2); international influence (3.3–3.4, Level 2) does not exceed R&D capacity (4.1, Level 2); and capacity (Dimension 4) is aligned with infrastructure (Dimension 2). No anomalous inversions are detected. The score of 2.00 places Argentina at the threshold between awareness and development: the country systematically recognises its sovereignty deficits but, except in two indicators, has not crossed over into the

effective construction of independence.

#### 4.4 The Milei pattern: active deregulation as a ceiling factor

The most significant cross-cutting finding is that the Milei administration's trajectory operates as a ceiling factor that manifests independently in at least four indicators, through distinct methodological mechanisms. In indicator 1.3, the adequacy commitment with the United States activates the Principle #7 override and collapses the rating to Level 1<sup>143</sup>. In indicator 3.1, the trajectory clause caps legislative capacity at Level 2 owing to the Ministry of Deregulation's quantified normative dismantling — 543 measures over 2,519 norms. In indicators 4.1 and 4.4, the fiscal collapse — a real cut of 50.6% in the science-and-technology function and the suspension of the Law No. 27614 financing law<sup>145</sup> — invalidates the investment trajectory that Level 3 requires. The methodological distinction is important: the framework does not penalise the Argentine macroeconomic situation (that would be context, which by Principle #6 explains but does not excuse), but the active policy of capacity subtraction. Deregulation is not a circumstance Argentina suffers; it is a government decision that the index registers as direction.

#### 4.5 The Argentine paradox

The second cross-cutting finding is the paradox be-

tween the regulatory sophistication of the data point and the collapse of its sovereignty in the flow. Argentina possesses the most mature data-protection framework in Latin America — the only one with European Union adequacy since 2003<sup>146</sup>, reaffirmed in 2024<sup>147</sup> — which earns it the only Level 3 of Dimension 1 on its own legislative merit (1.1). But that same country, in the same period, commits to the recognition of the United States as an adequate jurisdiction, bringing the protection of cross-border flows down to Level 1 (1.3). The contrast is not accidental: the Law No. 25326 regime was designed looking towards Europe — it is a transplant of the European standard — and adequacy flows towards Argentina (inbound recognition), while the new US adequacy flows from Argentina towards the hegemonic jurisdiction of platforms (outbound cession). Argentina knows how to write European-class data laws, but at the decisive moment it cedes sovereignty over the outflow of those data to where the platforms that exploit them reside. The paradox extends to 1.4: the country that best legislates the data point is also the one that least exploits it economically.

#### 4.6 Structural and multi-actor constraints

The multi-actor analysis confirms these patterns. The **government** of the period prioritises deregulation and the attraction of foreign investment (RIGI) over the construction of sovereign capacity. The **large foreign platforms** capture cloud growth (AWS, OpenAI/Sur Energy)<sup>148</sup> and acquire domestic champions

143 AR-EV-0031: 'El 13 de noviembre de 2025, los presidentes Donald J. Trump y Javier Milei suscribieron el Joint...' Policy. <https://www.whitehouse.gov/briefings-statements/2025/11/joint-statement-on-framework-for-a-united-states-argentina-agreement-on-reciprocal-trade-and-investment/>. Accessed 2026-05-29.; AR-EV-0032: 'El 5 de febrero de 2026 en Washington D.C., la República Argentina y los Estados Unidos...' Policy. <https://www.cancilleria.gob.ar/es/destacados/argentina-y-estados-unidos-firmaron-un-acuerdo-sobre-comercio-e-inversiones-reciprocas>. Accessed 2026-05-29.

144 AR-EV-0133: 'The Ministerio de Desregulación y Transformación del Estado (created July 2024 under Federico...' Data. <https://www.argentina.gob.ar/desregulacion>. Accessed 2026-05-29.

145 AR-EV-0235: 'La Función Ciencia y Tecnología del Presupuesto Nacional cayó un 11,4% adicional en el primer...' Data. <https://ciicti.org/el-2026-llego-con-mas-recortes-presupuestarios-a-la-ciencia-argentina/>. Accessed 2026-05-29.; AR-EV-0182: 'Law No. 27614 (Ley de Financiamiento del Sistema Nacional de Ciencia, Tecnología e Innovación...' Regulation. <https://www.iade.org.ar/noticias/ley-de-financiamiento-del-sistema-nacional-de-ciencia-tecnologia-e-innovacion-en-argentina>. Accessed 2026-05-29.

146 AR-EV-0035: 'En enero de 2024 la Comisión Europea publicó el primer informe de revisión de las decisiones de...' Policy. <https://www.argentina.gob.ar/noticias/argentina-logro-la-nueva-adequacion-por-parte-de-la-union-europea-para-el-flujo>. Accessed 2026-05-29.

147 AR-EV-0007: 'La AAIP publica como guía oficial vigente que los países considerados con legislación adecuada son...' Report. <https://www.argentina.gob.ar/aaip/datospersonales/transferencias-internacionales>. Accessed 2026-05-29.

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(Auth0 → Okta)<sup>149</sup>, in a pattern that the framework reads as corporate capture and dependency penalty.

**Civil society** and **academia** sustain real capacity — civic-tech, CONICET, the free university system — but without budget or retention: the most capable talent emigrates<sup>150</sup> and scientific investment collapses<sup>151</sup>. The dominant geopolitical constraint is the realignment with the United States, which materialises the sovereignty cost of Principle #7. By Principle #6, these circumstances explain the pattern but do not raise any rating.

#### 4.7 Prospective synthesis

Should the deregulation trajectory be sustained through 2027 — fiscal cuts in science and technology, deepening of US adequacy, absence of legislative modernisation — Argentina's average score would tend to decline from the current 2.00, driven by additional erosion in Dimensions 1 and 4 and by the downward pressure already noted in 2.1 (collapse of the Fuegian assembly base) and 4.1 (depletion of the research stock). Chapter 5 develops the scenarios and actions that could reverse this direction.

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## Chapter 5 — Conclusions and Recommendations

### 5.1 Five principal conclusions

**First: Argentina is a country of mid-to-low-grade digital sovereignty (2.00 / 5.0) without a single competent indicator.** The matrix records no Level 4 or 5; its two high points (1.1 and 4.3) reach Level 3, and two low points (1.3 and 1.4) fall to Level 1. The country systematically recognises its deficits — it is 'aware' in ten of sixteen indicators — but awareness has not translated into effective capacity<sup>152</sup>.

**Second: data ownership is the central fracture.** With an average of 1.75, Dimension 1 concentrates the Argentine weakness, not for absence of a legal framework but for its paradoxical use: a sophisticated protection regime (1.1) that does not retain data territorially (1.2), cedes them to the hegemonic jurisdiction (1.3), and does not capture their value (1.4)<sup>153</sup>.

**Third: structural dependence is cross-cutting and concentrated in infrastructure and capacity.** Dimensions 2 and 4 show that Argentine engineering capacity — real and of international scale — is deployed on others' rails: hardware assembled but not manufactured, software with foreign upstream, an industry that exports services, and exports its talent<sup>154</sup>.

**Fourth: the deregulation of the period operates as a ceiling factor, not as context.** US adequacy (1.3), normative dismantling (3.1), and fiscal collapse (4.1, 4.4) are active policies that the framework registers as a downward direction, not as mitigating circumstances<sup>155</sup>.

**Fifth: Argentina groups with Brazil, separated by direction.** The closest regional comparator surpasses Argentina in the indicators where it builds (domestic ERP, AI law, effective enforcement), while Argentina retains its historical advantage only where it inherited capacity (1.1). Directionality — construction versus dismantling — is the decisive separator<sup>156</sup>.

### 5.2 Five recommendations

**1. To the Congreso de la Nación: enact the data-protection reform within the term of the next ordinary session.** The modernising bill (successor to Message 87/2023, lost for lack of consideration) must enter into force with regulated breach notification, impact assessments, the data-protection officer, and non-negotiably, a fine cap no lower than 2% of the offender's annual revenue, to restore the deterrence that the USD 70–100 scale has lost<sup>157</sup>. Without updat-

152 AR-EV-0212: 'Argentina's software industry reached USD 22,221 million in revenue in 2024 (+13.1% interannual)...' Data. <https://www.itsitio.com/ar/software/software-argentino-bate-records/>. Accessed 2026-05-29.; AR-EV-0001: 'El artículo 12 de la Law No. 25326 prohíbe la transferencia de datos personales de cualquier tipo con...' Regulation. <https://servicios.infoleg.gob.ar/infolegInternet/anexos/60000-64999/64790/texact.htm>. Accessed 2026-05-29.

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ing the cap, indicators 1.1 and 3.2 will remain capped at Level 3 and Level 2 respectively.

**2. To the Executive and the Cancillería: condition the Framework Agreement's US adequacy commitment on equivalent protection guarantees.** In the short term, before the operational implementation of the Agreement on Reciprocal Trade and Investment, the Executive should incorporate safeguards — redress mechanisms for data subjects and limitation of extraterritorial access — that mitigate the sovereignty cost that Principle #7 penalises<sup>158</sup>. Without it, indicator 1.3 will remain collapsed at Level 1.

**3. To the Ministry of Economy and the Secretariat of Innovation, Science and Technology: align budget with strategy and restore the path of Law No. 27614.** Within the term of the next national budget (ending the two-year carryover), the inter-ministerial AI roundtable, and the National AI Plan should be endowed with their own budget allocation, and the suspended progressivity articles of Law No. 27614 should be reactivated<sup>159</sup>. Indicator 4.4 will not exceed Level 2 while the strategy lacks a living budget.

**4. To the private sector and the promotion agencies: orient the Knowledge Economy incentives towards**

**horizontal substitution and the foundational layer.**

In the medium term, the tax benefits of Law No. 27506 should be conditioned on the generation of product — not only export services — and on the retention of intellectual property in the country, to reverse the foreign-acquisition pattern exemplified by the Auth0 → Okta case<sup>160</sup>. This is a prerequisite for indicator 4.3 to move towards Level 4.

**5. To academia and CONICET: institutionalise talent retention and production in frontier venues.**

In the medium and long term, the restoration of doctoral scholarships and the creation of retention incentives and of incentives to publish in top-tier venues — linked to the already-existing sovereign infrastructure (Clementina XXI, QUANTEC) — are a condition for moving indicators 4.1 and 4.2<sup>161</sup>.

### 5.3 Future trajectory: three scenarios

**Favourable scenario.** If Congress enacted the data reform with deterrent caps, the Executive introduced safeguards to US adequacy and the budget restored the science-and-technology path, Argentina could recover Level 4 in 1.1 and Level 3 in 1.3 and 3.2, raising the average score towards 2.3–2.5 over a horizon of three to five years.

157 AR-EV-0004: 'El Proyecto de Ley de Protección de Datos Personales presentado por el Poder Ejecutivo Nacional en...' Policy. <https://www.argentina.gob.ar/aaip/datospersonales/proyecto-ley-datos-personales>. Accessed 2026-05-29.; AR-EV-0141: 'La Resolución AAIP 126/2024, publicada en el Boletín Oficial el 24 de mayo de 2024 y en vigor desde...' Regulation. <https://servicios.infoleg.gob.ar/infolegInternet/anexos/395000-399999/399750/norma.htm>. Accessed 2026-05-29.

158 AR-EV-0032: 'El 5 de febrero de 2026 en Washington D.C., la República Argentina y los Estados Unidos...' Policy. <https://www.cancilleria.gob.ar/es/destacados/argentina-y-estados-unidos-firmaron-un-acuerdo-sobre-comercio-e-inversiones-reciprosos>. Accessed 2026-05-29.

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161 AR-EV-0196: 'In 2024 CONICET cut doctoral scholarship allocations by approximately 30%, awarded 950 scholarships...' Policy. <https://www.scidev.net/america-latina/news/mas-becas-en-un-clima-incierto-para-hacer-ciencia-en-argentina/>. Accessed 2026-05-29.; AR-EV-0186: 'Clementina XXI, supercomputadora adquirida por Argentina vía Iniciativa Nacional de Supercómputo...' CaseStudy. <https://www.argentina.gob.ar/noticias/argentina-pone-en-funcionamiento-la-supercomputadora-clementina-xxi>. Accessed 2026-05-29.; AR-EV-0187: 'El proyecto QUANTEC del Grupo de Circuitos Cuánticos del Centro Atómico Bariloche (CNEA-CONICET)...' CaseStudy. <https://www.argentina.gob.ar/noticias/cientificos-del-centro-atomico-bariloche-buscan-crear-un-procesador-cuantico-con-circuitos>. Accessed 2026-05-29.

**Continuity scenario.** Should current trends hold — strategy without budget, stalled legislative modernisation, US adequacy in force — the score would hold around 2.00, with the industrial strength (4.3) compensating for the gradual erosion in other areas.

**Unfavourable scenario.** If deregulation were to deepen — collapse of the Fuegian assembly base, depletion of the research stock, statutory codification of US adequacy — the score would decline towards 1.7–1.8, with indicator 2.1 sliding to Level 1 and downward pressure across the whole of Dimension 4.

#### **5.4 Future research questions**

This report leaves open five lines that the evidence and time limitations did not allow to resolve. First:

what is the emigration rate specific to doctorates in computer science and artificial intelligence, today sealed as a gap for lack of a Tier-1 source? Second: what effective share of public software spending corresponds to providers of national origin, a figure that neither COMPR.AR nor the AGN segments? Third: what are the rates of judicial confirmation and of effective collection of the administrative fines of the AAIP, and the competition authority? Fourth: what operational impact will the new architecture of Decreto (Decree) 941/2025 (National Cybersecurity Centre, Federal Cyberintelligence Agency) have once it produces measurable activity? Fifth: how will Argentine participation in international technical standards evolve if the URL\_BLOCKED items from ITU and 3GPP documentary databases, which the verifier could not access, are recovered?

## References (by Dimension)

The references are grouped by dimension and list, in ascending order, each evidence identifier actually cited in the body of the report. The complete library is kept in evidence\_base\_UNGS\_2026.json. Corpus access date: 2026-05-29.

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- <sup>163</sup> Decreto 1558/2001, implementing Law No. 25326 (in force, designates the enforcement authority). Regulation, Tier-1. Source: infoleg.gob.ar.
- <sup>164</sup> Agencia de Acceso a la Información Pública (AAIP) — regulator with the National Directorate for the Protection of Personal Data. Regulation, Tier-1. Source: argentina.gob.ar/aaip.
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- <sup>192</sup> Decreto 117/2016 — open-data programme on a transparency logic. Regulation, Tier-1.
- <sup>193</sup> Law No. 27275 on access to public information. Regulation, Tier-1.
- <sup>194</sup> Decreto 780/2024 — restriction of the scope of active transparency. Regulation, Tier-1.
- <sup>195</sup> datos.gob.ar portal — 1,235 datasets from 42 agencies. Data, Tier-1.
- <sup>196</sup> PAIS tax — consumption tax repealed in December 2024. CaseStudy, Tier-1.
- <sup>197</sup> CNDC — digital-markets study group without sanctioning power. CaseStudy, Tier-1.
- <sup>198</sup> CNDC — eleven concentrated markets, none a digital-native platform. CaseStudy, Tier-1.
- <sup>199</sup> Civic-tech ecosystem reusing public data. CaseStudy, Tier-2.
- <sup>200</sup> Gap — absence of an operative B2G mandate. Gap, Tier-1.
- <sup>201</sup> Gap — absence of recognition of data as a factor of production. Gap, Tier-1.
- <sup>202</sup> Gap — OECD Pillar One and Pillar Two not implemented. Gap, Tier-1.
- <sup>203</sup> Gap — absence of institutional data trusts. Gap, Tier-2.

## Dimension 2 — Digital infrastructure

- <sup>204</sup> Compre Argentino (Law No. 27437) — public-procurement preference. Regulation, Tier-1.
- <sup>205</sup> Tierra del Fuego regime (Law No. 19640) — assembly (~93% of phones, AC, TV). Report, Tier-2.

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- 189 AR-EV-0035: 'En enero de 2024 la Comisión Europea publicó el primer informe de revisión de las decisiones de...' Policy. <https://www.argentina.gob.ar/noticias/argentina-logro-la-nueva-adequacion-por-parte-de-la-union-europea-para-el-flujo>. Accessed 2026-05-29.
- 190 AR-EV-0040: 'Microsoft, en su documentación oficial de cumplimiento publicada en learn.microsoft.com, declara...' Report. <https://learn.microsoft.com/en-us/compliance/regulatory/offering-pdpa-argentina>. Accessed 2026-05-29.
- 191 AR-EV-0041: 'No se identificó fuente Tier-1 que documente estadísticas cuantitativas específicas del régimen de...' Gap. Accessed 2026-05-29.
- 192 AR-EV-0042: 'El Decree 117/2016, suscrito el 12 de enero de 2016, instruye a los ministerios, secretarías y...' Regulation. <https://www.argentina.gob.ar/normativa/nacional/decreto-117-2016-257755>. Accessed 2026-05-29.
- 193 AR-EV-0043: 'La Law No. 27275 de Derecho de Acceso a la Información Pública, sancionada el 14 de septiembre de...' Regulation. <https://servicios.infoleg.gob.ar/infolegInternet/anexos/265000-269999/265949/norma.htm>. Accessed 2026-05-29.
- 194 AR-EV-0044: 'El Decree 780/2024, firmado el 30 de agosto de 2024 (BO 02-09-2024), reglamentó modificaciones al...' Regulation. <https://www.boletinoficial.gob.ar/detalleAviso/primera/313139/20240902>. Accessed 2026-05-29.
- 195 AR-EV-0045: 'El portal nacional datos.gob.ar registra 1.235 datasets publicados por 42 organizaciones del sector...' Data. <https://datos.gob.ar/>. Accessed 2026-05-29.
- 196 AR-EV-0047: 'El impuesto PAIS, que añadía una alícuota del 8% sobre suscripciones a servicios digitales del...' CaseStudy. <https://chequeado.com/el-explicador/fin-del-impuesto-pais-que-impacto-tendra-en-las-compras-de-bienes-y-servicios-en-el-externo-en-el-turismo-y-en-las-importaciones/>. Accessed 2026-05-29.
- 197 AR-EV-0048: 'La Comisión Nacional de Defensa de la Competencia (CNDC) creó un Grupo de Investigación y Trabajo...' CaseStudy. <https://www.argentina.gob.ar/noticias/la-cndc-creo-el-grupo-de-investigacion-y-trabajo-sobre-mercados-digitales>. Accessed 2026-05-29.
- 198 AR-EV-0049: 'La CNDC investiga 11 mercados de alta concentración: aluminio, acero, petroquímica, comunicaciones...' CaseStudy. <https://www.casosada.gob.ar/35904-once-mercados-con-altaconcentraci>. Accessed 2026-05-29.
- 199 AR-EV-0053: 'Organizaciones civiles argentinas — LA NACION Data junto con ACIJ, Directorio Legislativo y Poder...' CaseStudy. <https://www.lanacion.com.ar/sociedad/periodismo-de-datos-una-iniciativa-y-un-equipo-para-agregar-valor-e-innovar-nid2312192/>. Accessed 2026-05-29.
- 200 AR-EV-0054: 'No se identifica fuente Tier-1 que documente la existencia de un mandato general operativo de...' Gap. Accessed 2026-05-29.
- 201 AR-EV-0055: 'No se identifica fuente Tier-1 que documente reconocimiento estatal explícito de los datos como...' Gap. Accessed 2026-05-29.
- 202 AR-EV-0057: 'No se identifica fuente Tier-1 que documente la implementación por parte de Argentina de mecanismos...' Gap. Accessed 2026-05-29.
- 203 AR-EV-0058: 'No se identifica fuente Tier-1 que documente la existencia operativa de data trusts, data...' Gap. Accessed 2026-05-29.
- 204 AR-EV-0059: 'La Law No. 27437 de Compre Argentino y Desarrollo de Proveedores, promulgada en abril de 2018 y...' Regulation. <https://servicios.infoleg.gob.ar/infolegInternet/anexos/310000-314999/310020/norma.htm>. Accessed 2026-05-29.
- 205 AR-EV-0060: 'La Law No. 19640, sancionada en 1972, estableció un régimen aduanero y fiscal especial para Tierra del...' Regulation. <https://prodyambiente.tierradelfuego.gob.ar/regimen-de-promocion-economica-y-fiscal-ley-19-640-2/>. Accessed 2026-05-29.

- <sup>206</sup> Decreto 333/2025 — mobile-phone tariff reduction 8% → 0% by January 2026. Regulation, Tier-1.
- <sup>207</sup> RIGI — enclave model without a technology-transfer obligation. Policy, Tier-1.
- <sup>208</sup> Knowledge Economy (Law No. 27506) — benefits to software/services. Regulation, Tier-1.
- <sup>209</sup> Design-only semiconductor capacity (INTI/IDME), no wafer plant. Report, Tier-2.
- <sup>210</sup> Mirgor Group — suspension of ~360 workers. CaseStudy, Tier-2.
- <sup>211</sup> CTI Guidelines 2025–2027 — omission of microelectronics/semiconductors. Policy, Tier-1.
- <sup>212</sup> Desktop OS share (Windows 81.64%; Linux 2.21%). Data, Tier-3.
- <sup>213</sup> Mobile market >99.97% foreign. Data, Tier-3.
- <sup>214</sup> State Huayra GNU/Linux distribution (EDUCAR). CaseStudy, Tier-2.
- <sup>215</sup> Suspension of Conectar Igualdad / Educ.ar ('construction mode'). CaseStudy, Tier-1.
- <sup>216</sup> Decreto 963/2024 — intervention of EDUC.AR S.E. Regulation, Tier-1.
- <sup>217</sup> National Public Cloud (ARSAT) on open-source code. Report, Tier-1.
- <sup>218</sup> ARSAT runs its NOC on Red Hat OpenShift (foreign control plane). CaseStudy, Tier-2.
- <sup>219</sup> ONTI Public Software initiative. Policy, Tier-1.
- <sup>220</sup> ONTI Disposition 2/2019 — code sharing under open licences. Regulation, Tier-1.
- <sup>221</sup> Santa Fe provincial free-software law (Law No. 12360). Regulation, Tier-2.
- <sup>222</sup> Database market dominated by Oracle/SAP/Microsoft/IBM. Data, Tier-3.

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- 206 AR-EV-0061: 'El Decree 333/2025, publicado en el Boletín Oficial el 20 de mayo de 2025, reduce a 8% el Derecho...' Regulation. <https://www.boletinoficial.gob.ar/detalleAviso/primera/325601/20250520>. Accessed 2026-05-29.
- 207 AR-EV-0062: 'Argentina no exhibe acuerdos bilaterales de transferencia tecnológica vigentes con jurisdicciones...' Regulation. <https://servicios.infoleg.gob.ar/infolegInternet/anexos/400000-404999/403230/norma.htm>. Accessed 2026-05-29.
- 208 AR-EV-0063: 'La Law No. 27506 del Régimen de Promoción de la Economía del Conocimiento (publicada en el Boletín...' Regulation. <https://servicios.infoleg.gob.ar/infolegInternet/anexos/320000-324999/324101/norma.htm>. Accessed 2026-05-29.
- 209 AR-EV-0064: 'El Instituto Nacional de Tecnología Industrial (INTI), a través de su área de Micro y...' CaseStudy. <https://www.inti.gob.ar/areas/desarrollo-tecnologico-e-innovacion/areas-de-conocimiento/micro-y-nanotecnologias>. Accessed 2026-05-29.
- 210 AR-EV-0066: 'El Grupo Mirgor adquirió en 2021 la operación de Brightstar en Tierra del Fuego, sumando a IATEC y...' CaseStudy. <https://mirgor.com/mirgor-adquiere-brightstar-tierra-del-fuego/>. Accessed 2026-05-29.
- 211 AR-EV-0068: 'Los Lineamientos Estratégicos de Innovación, Ciencia y Tecnología 2025-2027, aprobados por...' Policy. <https://www.argentina.gob.ar/ciencia/plan-nacional-cti/plan-cti>. Accessed 2026-05-29.
- 212 AR-EV-0074: 'El sistema operativo de escritorio dominante en Argentina al mes de abril de 2026 es Windows con...' Data. <https://gs.statcounter.com/os-market-share/desktop/argentina>. Accessed 2026-05-29.
- 213 AR-EV-0075: 'El mercado de sistemas operativos móviles en Argentina al mes de abril de 2026 está dominado por...' Data. <https://gs.statcounter.com/os-market-share/mobile/argentina>. Accessed 2026-05-29.
- 214 AR-EV-0076: 'Huayra GNU/Linux es el sistema operativo libre desarrollado en EDUCAR Sociedad del Estado, descrito...' CaseStudy. <https://huayra.educar.gob.ar/>. Accessed 2026-05-29.
- 215 AR-EV-0077: 'In January 2024 the Milei government suspended access to Conectar Igualdad and Educ.ar —...' CaseStudy. <https://www.ambito.com/politica/el-gobierno-bloqueo-las-plataformas-conectar-igualdad-y-educar-n5931668>. Accessed 2026-05-29.
- 216 AR-EV-0078: 'El Decree 963/2024, publicado en el Boletín Oficial el 31 de octubre de 2024, designa a Gastón...' Regulation. <https://www.boletinoficial.gob.ar/detalleAviso/primera/316281/20241031>. Accessed 2026-05-29.
- 217 AR-EV-0079: 'ARSAT desplegó la etapa 1 de la Nube Pública Nacional el 1° de abril de 2021, construida sobre...' CaseStudy. <https://www.canal-ar.com.ar/29335-ARSAT-lanzo-la-Nube-Publica-Nacional-y-ofrece-infraestructura-y-servicios-a-demanda.html>. Accessed 2026-05-29.
- 218 AR-EV-0080: 'ARSAT desplegó Red Hat OpenShift AI para apoyar operaciones de centro de operaciones de red (NOC)...' CaseStudy. <https://www.redhat.com/en/success-stories/arsat>. Accessed 2026-05-29.
- 219 AR-EV-0081: 'La iniciativa de Software Público de la Subsecretaría de Gobierno Digital (ONTI, dependiente de...' Policy. <https://argentina.gob.ar/jefatura/innovacion-publica/ssetic/onti/software-publico>. Accessed 2026-05-29.
- 220 AR-EV-0082: 'La Disposición ONTI 2/2019 aprobó el Código de Buenas Prácticas para el desarrollo de software...' Policy. <https://www.boletinoficial.gob.ar/detalleAviso/primera/206660/20190430>. Accessed 2026-05-29.
- 221 AR-EV-0083: 'La Provincia de Santa Fe sancionó la Law No. 12360 el 15 de diciembre de 2004, reglamentada por...' Regulation. <https://www.santafe.gob.ar/index.php/web/content/view/full/3601>. Accessed 2026-05-29.
- 222 AR-EV-0084: 'El mercado latinoamericano de sistemas de gestión de bases de datos está dominado por Oracle...' Data. <https://www.informesdeexpertos.com/informes/mercado-latinoamericano-de-sistemas-de-gestion-de-bases-de-datos>. Accessed 2026-05-29.

- <sup>223</sup> Official argob repositories (43 repositories). Data, Tier-1.
- <sup>224</sup> Mi Argentina — state platform, 21 million registered users. CaseStudy, Tier-1.
- <sup>225</sup> Software/IT-services exports USD 2,674M (2024), 46.9% to the US. Data, Tier-3.
- <sup>226</sup> Law No. 27506 Knowledge Economy (promotion). Regulation, Tier-1.
- <sup>227</sup> Mercado Libre — national-download leader 2024 (11.7M). Data, Tier-3.
- <sup>228</sup> Mercado Pago — 50M+ active users LATAM, USD 8,600M revenue. Data, Tier-3.
- <sup>229</sup> Digital banking — 88% across three domestic neobanks. Data, Tier-3.
- <sup>230</sup> Foreign horizontal consumer categories (WhatsApp 93%, Instagram 86.7%, TikTok 58.4%). Data, Tier-3.
- <sup>231</sup> Search — Google 94.01%. Data, Tier-3.
- <sup>232</sup> Auth0 → Okta acquisition. CaseStudy, Tier-3.
- <sup>233</sup> Gap — ERP/CRM without auditable domestic share. Gap, Tier-2.
- <sup>234</sup> CERT.ar (Disposition 1/2021). Regulation, Tier-1.
- <sup>235</sup> CERT.ar — 438 incidents in 2024 (61% state sector). Data, Tier-1.
- <sup>236</sup> Administrative Decision 641/2021 — minimum security requirements and 48h notification. Regulation, Tier-1.
- <sup>237</sup> Decreto 941/2025 — National Cybersecurity Centre and Federal Cyberintelligence Agency. Regulation, Tier-1.
- <sup>238</sup> Leak of the national driver's-licence database (~5.7–6M, 1.25 TB, April 2024). CaseStudy, Tier-2.

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- 223 AR-EV-0086: 'La organización oficial 'argob' en GitHub aloja 43 repositorios; los más populares corresponden a...' Data. <https://github.com/argob>. Accessed 2026-05-29.
- 224 AR-EV-0093: 'Mi Argentina, la plataforma de identidad digital ciudadana, supera los 21 millones de personas...' CaseStudy. <https://www.argentina.gob.ar/noticias/se-renueva-mi-argentina-con-mas-y-mejores-servicios-para-la-ciudadania>. Accessed 2026-05-29.
- 225 AR-EV-0096: 'El sector argentino de software y servicios informáticos exportó USD 2.674 millones en 2024, un...' Data. <https://cessi.org.ar/2025/05/21/el-software-argentino-genero-mas-de-6-000-empleos-y-alcanzo-un-record-de-exportaciones/>. Accessed 2026-05-29.
- 226 AR-EV-0097: 'Argentina's Law No. 27506 (Régimen de Promoción de la Economía del Conocimiento), in force since 1...' Regulation. <https://www.argentina.gob.ar/normativa/nacional/ley-27506-324101/actualizacion>. Accessed 2026-05-29.
- 227 AR-EV-0098: 'Mercado Libre lideró el ranking de aplicaciones más descargadas en Argentina en 2024 con 11,7...' CaseStudy. <https://mobiletime.la/noticias/23/01/2025/apps-mas-descargadas-2024/>. Accessed 2026-05-29.
- 228 AR-EV-0099: 'Mercado Pago superó los 50 millones de usuarios activos mensuales en LATAM en 2024 y reportó USD...' Data. <https://investor.mercadolibre.com/>. Accessed 2026-05-29.
- 229 AR-EV-0101: 'El segmento de digital banking argentino está concentrado en tres jugadores domésticos: Ualá (6...' Data. <https://fintechnews.am/fintech-argentina/52228/argentinas-top-3-digital-banks-capture-nearly-90-market-share/>. Accessed 2026-05-29.
- 230 AR-EV-0102: 'WhatsApp (Meta) tiene una penetración del 93% entre usuarios mayores de 16 años en Argentina, e...' Data. <https://www.infobae.com/tecnologia/2025/04/04/radiografia-digital-que-hacen-los-argentinos-en-internet-y-en-que-redes-sociales-pasan-mas-tiempo/>. Accessed 2026-05-29.
- 231 AR-EV-0103: 'Google posee el 94,01% del mercado de búsquedas en Argentina a abril de 2026 (Bing 4,13%, Yahoo...' Data. <https://gs.statcounter.com/search-engine-market-share/all/argentina>. Accessed 2026-05-29.
- 232 AR-EV-0104: 'Auth0, empresa argentina de autenticación digital fundada en 2013, fue adquirida en 2021 por Okta...' CaseStudy. <https://www.infobae.com/economia/2021/06/23/otra-tech-argentina-se-convirtio-en-unicornio-y-es-el-sexto-local-que-hace-y-quien-es-el-millennial-autodidacta-que-la-fundo/>. Accessed 2026-05-29.
- 233 AR-EV-0107: 'No se identificó fuente Tier-1 que documente cifras consolidadas y auditables de participación de...' Gap. Accessed 2026-05-29.
- 234 AR-EV-0108: 'La Disposición 1/2021 de la Dirección Nacional de Ciberseguridad crea el Centro Nacional de...' Regulation. <https://www.boletinoficial.gob.ar/detalleAviso/primera/241077/20210222>. Accessed 2026-05-29.
- 235 AR-EV-0109: 'Durante 2024, el CERT.ar registró 438 incidentes de ciberseguridad, una cifra 15% superior a los...' Data. <https://www.argentina.gob.ar/jefatura/innovacion-ciencia-y-tecnologia/ciberseguridad/informes-de-la-direccion-nacional-de>. Accessed 2026-05-29.
- 236 AR-EV-0112: 'La Decisión Administrativa 641/2021 aprueba los Requisitos Mínimos de Seguridad de la Información...' Regulation. <https://servicios.infoleg.gob.ar/infolegInternet/anexos/350000-354999/351345/norma.htm>. Accessed 2026-05-29.
- 237 AR-EV-0114: 'Por Decree 941/2025 del Poder Ejecutivo (publicado el 2 de enero de 2026 en el Boletín Oficial) se...' Regulation. <https://www.boletinoficial.gob.ar/detalleAviso/primera/337032/20260102>. Accessed 2026-05-29.
- 238 AR-EV-0116: 'En abril de 2024 se difundió en Telegram una base con datos de aproximadamente 5,7-6 millones de...' CaseStudy. <https://www.lanacion.com.ar/seguridad/la-venden-a-us-3700-hackearon-la-base-de-datos-nacional-de-licencias-de-conducir-y-muestran-las-de-nid16042024/>. Accessed 2026-05-29.

- <sup>239</sup> Defacement of Mi Argentina/SUBE (Dec. 2024), no 2FA on central sites. CaseStudy, Tier-2.
- <sup>240</sup> Recurring RENAPER incidents. CaseStudy, Tier-2.
- <sup>241</sup> Gap — absence of sovereign cryptographic research and a security industry. Gap, Tier-1.
- <sup>242</sup> Gap — absence of documented sovereign offensive/red-team capacity. Gap, Tier-1.

### Dimension 3 — Digital governance

- <sup>243</sup> Law No. 26388 on cybercrime (2008). Regulation, Tier-1.
- <sup>244</sup> Law No. 25506 on electronic signature (2001). Regulation, Tier-1.
- <sup>245</sup> DNU 302/2024 — repeal of art. 15 of Law No. 27078. Regulation, Tier-1.
- <sup>246</sup> AI governance — non-binding AAIP programme. Policy, Tier-1.
- <sup>247</sup> 'Low-regulation hub' positioning for AI. Analysis, Tier-2.
- <sup>248</sup> Ministry of Deregulation — 543 measures / 2,519 norms / 15,144 articles (verified). Data, Tier-1.
- <sup>249</sup> Absence of a platform statute; intermediary-liability bill without enactment. Policy, Tier-2.
- <sup>250</sup> Cybersecurity by DNC dispositions, without a parliamentary statute. Regulation, Tier-1.
- <sup>251</sup> Discontinuation of the national AI strategy. Policy, Tier-2.
- <sup>252</sup> AAIP statutory fine scale (ARS 1,000–100,000). Regulation, Tier-1.
- <sup>253</sup> AAIP Resolution 126/2024 — graduation of sanctions. Regulation, Tier-1.

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- 239 AR-EV-0117: 'El 25-26 de diciembre de 2024 los sitios oficiales Mi Argentina y la plataforma de la tarjeta SUBE...' CaseStudy. <https://www.infobae.com/politica/2024/12/26/lo-hicimos-por-diversion-los-hackers-que-atacaron-los-sitios-del-gobierno-dijeron-que-no-tenian-segundo-factor-de-autenticacion/>. Accessed 2026-05-29.
- 240 AR-EV-0119: 'El RENAPER detectó en 2021 el uso indebido de una clave otorgada a un organismo público (Ministerio...)' CaseStudy. <https://www.argentina.gob.ar/noticias/el-renaper-detecto-el-uso-indebido-de-una-clave-otorgada-un-organismo-publico-y-formalizo>. Accessed 2026-05-29.
- 241 AR-EV-0120: 'No se identificó fuente Tier-1 que documente investigación criptográfica argentina con publicación...' Gap. Accessed 2026-05-29.
- 242 AR-EV-0121: 'No se identificó capacidad documentada de ciberseguridad ofensiva soberana (red team gubernamental...)' Gap. Accessed 2026-05-29.
- 243 AR-EV-0122: 'La Law No. 26388 de Delitos Informáticos, sancionada el 4 de junio de 2008, incorporó al Código Penal...' Regulation. <https://www.argentina.gob.ar/normativa/nacional/ley-26388-141790/texto>. Accessed 2026-05-29.
- 244 AR-EV-0125: 'Law No. 25506 (2001) establishes the legal validity of digital and electronic signatures in Argentina...' Regulation. <https://servicios.infoleg.gob.ar/infolegInternet/anexos/70000-74999/70749/norma.htm>. Accessed 2026-05-29.
- 245 AR-EV-0126: 'Article 15 of Law No. 27078 — which had designated TIC services as 'essential and strategic public...' Regulation. <https://servicios.infoleg.gob.ar/infolegInternet/anexos/235000-239999/239771/texact.htm>. Accessed 2026-05-29.
- 246 AR-EV-0131: 'Resolución AAIP 161/2023 created the 'Programa de Transparencia y Protección de Datos Personales en...' Policy. <https://www.boletinoficial.gob.ar/detalleAviso/primera/293363/20230904>. Accessed 2026-05-29.
- 247 AR-EV-0132: 'President Javier Milei has publicly positioned Argentina to compete as a 'low-regulation AI hub...' CaseStudy. <https://chequeado.com/el-explicador/argentina-polo-de-inteligencia-artificial-que-propone-el-gobierno-de-javier-milei-y-que-chances-hay-de-que-suceda/>. Accessed 2026-05-29.
- 248 AR-EV-0133: 'The Ministerio de Desregulación y Transformación del Estado (created July 2024 under Federico...' Data. <https://www.argentina.gob.ar/desregulacion>. Accessed 2026-05-29.
- 249 AR-EV-0134: 'Argentina lacks a horizontal platform-regulation statute. The intermediary-liability bill...' CaseStudy. <https://rest.hcdn.gob.ar/web/proyectos/290487/adjuntos/104934>. Accessed 2026-05-29.
- 250 AR-EV-0135: 'Argentina's cybersecurity-incident response framework rests on dispositions of the Dirección...' Regulation. <https://www.argentina.gob.ar/jefatura/innovacion-publica/direccion-nacional-ciberseguridad/normativa>. Accessed 2026-05-29.
- 251 AR-EV-0139: 'The Argentina national AI ecosystem framework — the Plan Nacional de Inteligencia Artificial...' Report. <https://oecd-opsi.org/wp-content/uploads/2021/02/Argentina-National-AI-Strategy.pdf>. Accessed 2026-05-29.
- 252 AR-EV-0140: 'La Resolución AAIP 126/2024, en vigor desde el 1 de junio de 2024, aprueba el régimen sancionatorio...' Regulation. <https://www.boletinoficial.gob.ar/detalleAviso/primera/308122/20240524>. Accessed 2026-05-29.
- 253 AR-EV-0141: 'La Resolución AAIP 126/2024, publicada en el Boletín Oficial el 24 de mayo de 2024 y en vigor desde...' Regulation. <https://servicios.infoleg.gob.ar/infolegInternet/anexos/395000-399999/399750/norma.htm>. Accessed 2026-05-29.

- <sup>254</sup> Shelving of the CNDC investigation against WhatsApp/Meta (2 Jul. 2025). CaseStudy, Tier-2.
- <sup>255</sup> Largest sanction against a Big Tech firm (Google, ARS 280,000, 2020). CaseStudy, Tier-2.
- <sup>256</sup> CNDC 2024 — 89 merger decisions, one procedural fine, zero conduct sanctions. Data, Tier-1.
- <sup>257</sup> IRAM — sole representative before ISO and (with CEA/AEA) IEC; COPANT/AMN. Report, Tier-2.
- <sup>258</sup> UTN Santa Fe — editors of five Y-series Recommendations of the ITU-T's SG20. CaseStudy, Tier-2.
- <sup>259</sup> Verified absence of an Argentine vice-chair in the ITU-T's SG20 (2025-2028). Data, Tier-2.
- <sup>260</sup> ISO/IEC 27002:2022 — Argentine editor (IRAM SC 27). CaseStudy, Tier-2.
- <sup>261</sup> CITEC — chair of the Steering Committee (2018) and rapporteurships. CaseStudy, Tier-2.
- <sup>262</sup> Verified absence of an Argentine organisation among the 329 members of the W3C. Data, Tier-2.
- <sup>263</sup> US–Argentina Framework Agreement with data adequacy. Policy, Tier-2.
- <sup>364</sup> Participation in the OEWG without co-sponsorship of substantive resolutions. Report, Tier-2.
- <sup>365</sup> Election of Beatriz Anchorena to the chairmanship of the Convention 108 Committee. CaseStudy, Tier-2.
- <sup>266</sup> Data bill with extraterritorial scope / anti-CLOUD Act (1948-D-2025). Policy, Tier-1.

#### Dimension 4 — Digital capacity

- <sup>267</sup> R&D investment 0.216% of GDP (2024), -31.3% real, 55.4% below Law No. 27614. Data, Tier-3.
- <sup>268</sup> Suspension of the progressivity articles of Law No. 27614. Regulation, Tier-1.

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- 255 AR-EV-0144: 'La AAIP sancionó a Google Argentina SRL y Google LLC mediante la Resolución 69/2020 por...' CaseStudy. <https://www.argentina.gob.ar/noticias/sancion-google-por-negar-el-derecho-de-acceso>. Accessed 2026-05-29.
- 256 AR-EV-0148: 'En 2024 la CNDC emitió 89 decisiones en control de concentraciones y una única multa por...' Data. <https://legalblogs.wolterskluwer.com/competition-blog/main-developments-in-competition-law-and-policy-2024-argentina/>. Accessed 2026-05-29.
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- 258 AR-EV-0160: 'Editors from Universidad Tecnológica Nacional (UTN, Santa Fe Regional Faculty) serve as editor, or...' CaseStudy. <https://uit.frsf.utn.edu.ar/>. Accessed 2026-05-29.
- 259 AR-EV-0161: 'The official ITU-T Study Group 20 management roster for the 2025-2028 study period (period 18)...' Data. <https://www.itu.int/net4/ITU-T/lists/mgmt.aspx?Group=20&Period=18>. Accessed 2026-05-29.
- 260 AR-EV-0162: 'Verónica Marinelli, coordinator of IRAM's Subcommittee on Information Security, Cybersecurity, and...' CaseStudy. <https://www.iram.org.ar/novedades/novedades-en-seguridad-de-la-informacion/>. Accessed 2026-05-29.
- 261 AR-EV-0163: 'Argentina was elected President of CITEC's Steering Committee (COM/CITEC) at the VII CITEC Assembly...' Report. <https://www.argentina.gob.ar/jefatura/innovacion-publica/ssetic/citel>. Accessed 2026-05-29.
- 262 AR-EV-0168: 'No organisation domiciled in Argentina appears among the 329 (as of May 2026) Member organisations...' Gap. <https://www.w3.org/membership/list/>. Accessed 2026-05-29.
- 263 AR-EV-0169: 'On 5 February 2026 the Argentine Foreign Ministry announced the signature of the United...' Policy. <https://www.cancilleria.gob.ar/es/actualidad/noticias/argentina-y-estados-unidos-firmaron-un-acuerdo-sobre-comercio-e-inversiones>. Accessed 2026-05-29.
- 264 AR-EV-0170: 'Argentina participated in the second cycle of the UN Open-Ended Working Group (OEWG) on Security of...' Report. <https://www.argentina.gob.ar/noticias/argentina-participo-en-naciones-unidas-de-un-grupo-de-trabajo-sobre-tic-y-seguridad>. Accessed 2026-05-29.
- 265 AR-EV-0171: 'In November 2024 Beatriz Anchorena, head of Argentina's Access to Public Information Agency (AAIP)...' CaseStudy. <https://www.argentina.gob.ar/noticias/beatriz-anchorena-titular-de-la-aaip-fue-electa-presidenta-del-comite-del-convenio-108-del>. Accessed 2026-05-29.
- 266 AR-EV-0178: 'A Personal Data Protection bill (HCDN 1948-D-2025) introduced in the Argentine Chamber of Deputies...' Analysis. <https://iapp.org/news/a/novedades-legislativas-en-argentina-sobre-proteccion-de-datos-personales-e-inteligencia-artificial>. Accessed 2026-05-29.
- 267 AR-EV-0181: 'Argentina's R&D investment fell to 0.216% of GDP in 2024, the lowest historical figure on record...' Data. <https://periferia.com.ar/indicios/la-inversion-en-ciencia-y-tecnologia-llego-a-su-mayor-deterioro-historico-en-2024/>. Accessed 2026-05-29.
- 268 AR-EV-0182: 'Law No. 27614 (Ley de Financiamiento del Sistema Nacional de Ciencia, Tecnología e Innovación...' Regulation. <https://www.iade.org.ar/noticias/ley-de-financiamiento-del-sistema-nacional-de-ciencia-tecnologia-e-innovacion-en-argentina>. Accessed 2026-05-29.

- <sup>269</sup> Clementina XXI — sovereign HPC, 15.3 PFLOPs, TOP500 #82. Data, Tier-2.
- <sup>270</sup> QUANTEC — CNEA-CONICET superconducting-qubit programme (4-6 qubits). Report, Tier-1.
- <sup>271</sup> MinCyT quantum-infrastructure call. Policy, Tier-1.
- <sup>272</sup> CONICET — #1 LatAm / #20 worldwide among governmental research bodies. Data, Tier-2.
- <sup>273</sup> Argentine output at top-tier venues: low, dependent on foreign co-authorship. Analysis, Tier-3.
- <sup>274</sup> CONICET doctoral scholarships cut ~30% (950 in 2024). Data, Tier-2.
- <sup>275</sup> S&T investment ~0.2% of GDP (2002 level). Data, Tier-2.
- <sup>276</sup> University pipeline (~6,500 engineering graduates/year; UTN 42.75%). Data, Tier-2.
- <sup>277</sup> Brain drain (top-30 emitter; ~30,000 scientists/engineers in the US). Data, Tier-2.
- <sup>278</sup> Remote-work model for foreign clients. Analysis, Tier-2.
- <sup>279</sup> RAICES — diaspora repatriation policy (Law No. 26421). Policy, Tier-1
- <sup>280</sup> No Argentine university in the global CS top 500 (UBA #555). Data, Tier-3.
- <sup>281</sup> Software industry USD 22,221M (2024), 158,179 jobs. Data, Tier-3.
- <sup>282</sup> SBC mix 2022 (software 33%, services 30%, architecture 22%, R&D 8%); USD 8,047M. Data, Tier-2.
- <sup>283</sup> Global software share 0.6% (2011) → 0.3% (2021). Data, Tier-2.
- <sup>284</sup> Auth0 — acquired by Okta (~USD 6,500M, 2021). CaseStudy, Tier-3.

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- 269 AR-EV-0186: 'Clementina XXI, supercomputadora adquirida por Argentina vía Iniciativa Nacional de Supercómputo...'. CaseStudy. <https://www.argentina.gob.ar/noticias/argentina-pone-en-funcionamiento-la-supercomputadora-clementina-xxi>. Accessed 2026-05-29.
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- 271 AR-EV-0188: 'La convocatoria 2023 de Proyectos de Fortalecimiento de Infraestructura Experimental en CyT...'. Policy. <https://www.argentina.gob.ar/ciencia/financiamiento/fort-exper-cytcuanticas-2023>. Accessed 2026-05-29.
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- 276 AR-EV-0198: 'Universidad Tecnológica Nacional (UTN) produce 42.75% of Argentina's engineering graduates...'. Data. <https://frba.utn.edu.ar/dia-de-la-ingenieria-la-utn-forma-mas-del-40-de-los-ingenieros-que-se-graduan-en-el-pais/>. Accessed 2026-05-29.
- 277 AR-EV-0200: 'Argentina is in the top 30 nations with highly-skilled emigrants according to OECD data, with...'. Data. <https://www.untref.edu.ar/mundountref/argentina-se-convirtio-en-un-polo-de-emigracion>. Accessed 2026-05-29.
- 278 AR-EV-0202: 'Argentine remote workers for foreign employers earn between USD 2,500 and USD 5,000 per month on...'. Data. <https://www.infobae.com/economia/2024/09/15/los-argentinos-que-trabajan-para-el-exterior-ganan-entre-2500-y-5000-dolares-por-mes/>. Accessed 2026-05-29.
- 279 AR-EV-0203: 'The RAICES Programme (Red de Argentinos Investigadores y Científicos en el Exterior), created in...'. Policy. <https://www.argentina.gob.ar/ciencia/seppcti/raices>. Accessed 2026-05-29.
- 280 AR-EV-0207: 'In the EduRank Latin America Computer Science ranking, UBA is #1 in Argentina, and #555 worldwide...'. Data. <https://edurank.org/cs/la/>. Accessed 2026-05-29.
- 281 AR-EV-0212: 'Argentina's software industry reached USD 22,221 million in revenue in 2024 (+13.1% interannual)...'. Data. <https://www.itsitio.com/ar/software/software-argentino-bate-records/>. Accessed 2026-05-29.
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- <sup>285</sup> Venture capital USD 1,337M (2021) → USD 412M (2024). Data, Tier-2.
- <sup>286</sup> OpenAI/Sur Energy data centre under the RIGI. CaseStudy, Tier-2.
- <sup>287</sup> The sector tends more towards development than research. Analysis, Tier-2.
- <sup>288</sup> >140,000 formal software employees (exceeds automotive+oil+mining). Data, Tier-2.
- <sup>289</sup> Law No. 27738 — National CTI Plan 2030. Regulation, Tier-1. Source: boletinoficial.gob.ar
- <sup>290</sup> Strategic Guidelines 2025–2027. Policy, Tier-1.
- <sup>291</sup> Inter-ministerial AI roundtable 'without its own budget allocation'. Regulation, Tier-1.
- <sup>292</sup> IDB loan of USD 35M as the only funding dedicated to AI. Policy, Tier-2.
- <sup>293</sup> Digital Agenda 2030 (Decreto 996/2018). Regulation, Tier-1.
- <sup>294</sup> DNU 70/2023 — economic emergency, 366 norms repealed/modified. Regulation, Tier-1.
- <sup>295</sup> MinCyT — create/downgrade/restore/downgrade cycle. Report, Tier-2.
- <sup>296</sup> S&T budget function -50.6% cumulative real 2024-2026. Data, Tier-1.
- <sup>297</sup> Conectar Igualdad — cancellation/relaunch across four administrations. CaseStudy, Tier-2.
- <sup>298</sup> 'Low-regulation hub' positioning. Policy, Tier-2.
- <sup>299</sup> Fundar — the 'Achilles' heel' of the AI strategy (university stock without investment). Analysis, Tier-2.
- <sup>300</sup> Budget carryover for two consecutive years. Report, Tier-2.

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- 285 AR-EV-0218: 'Argentine startups raised USD 412 million across 62 funding rounds in 2024 (46 seed rounds at USD...)' Data. <https://www.lanacion.com.ar/economia/negocios/los-emprendedores-argentinos-levantaron-mas-de-us412-millones-en-2024-nid11062025/>. Accessed 2026-05-29.
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- 287 AR-EV-0220: 'Within Argentina's R&D ecosystem the software industry accounts for 14% of total business R&D...' Data. <https://www.argentina.gob.ar/noticias/el-potencial-de-id-en-sectores-productivos-de-la-economia-del-conocimiento-software-y-ag-0>. Accessed 2026-05-29.
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- 290 AR-EV-0226: 'La Resolución 282/2025 de la Secretaría de Innovación, Ciencia y Tecnología (Jefatura de Gabinete)...' Regulation. <https://www.boletinoficial.gob.ar/detalleAviso/primera/333751/20251031>. Accessed 2026-05-29.
- 291 AR-EV-0227: 'La Decisión Administrativa 899/2024, publicada el 24 de septiembre de 2024, crea la Mesa...' Regulation. <https://www.boletinoficial.gob.ar/detalleAviso/primera/314465/20240924>. Accessed 2026-05-29.
- 292 AR-EV-0229: 'El Banco Interamericano de Desarrollo aprobó en 2023 un préstamo por USD 35 millones a Argentina...' CaseStudy. <https://www.argentina.gob.ar/noticias/nuevo-programa-de-35-millones-de-dolares-para-el-desarrollo-de-la-inteligencia-artificial>. Accessed 2026-05-29.
- 293 AR-EV-0230: 'La Agenda Digital 2030 fue presentada por el gobierno de Mauricio Macri el 5 de noviembre de 2018...' Policy. <https://www.argentina.gob.ar/noticias/el-gobierno-presento-la-nueva-agenda-digital-2030>. Accessed 2026-05-29.
- 294 AR-EV-0232: 'El Decreto de Necesidad y Urgencia 70/2023, emitido el 20 de diciembre de 2023, declaró la...' Regulation. <https://www.boletinoficial.gob.ar/detalleAviso/primera/301122/20231221>. Accessed 2026-05-29.
- 295 AR-EV-0234: 'El Ministerio de Ciencia, Tecnología e Innovación fue creado por Decree 21/2007 bajo la...' CaseStudy. [https://es.wikipedia.org/wiki/Ministerio\\_de\\_Ciencia,Tecnolog%C3%ADa\\_e\\_Innovaci%C3%B3n\(Argentina\)](https://es.wikipedia.org/wiki/Ministerio_de_Ciencia,Tecnolog%C3%ADa_e_Innovaci%C3%B3n(Argentina)). Accessed 2026-05-29.
- 296 AR-EV-0235: 'La Función Ciencia y Tecnología del Presupuesto Nacional cayó un 11,4% adicional en el primer...' Data. <https://ciicti.org/el-2026-llego-con-mas-recortes-presupuestarios-a-la-ciencia-argentina/>. Accessed 2026-05-29.
- 297 AR-EV-0236: 'El programa Conectar Igualdad —creado en 2010 por Decree 459/10, suspendido durante la...' CaseStudy. <https://palabrasdelderecho.com.ar/articulo/5007/Prorrogaron-la-vigencia-del-Programa-Conectar-Igualdad-por-dos-meses>. Accessed 2026-05-29.
- 298 AR-EV-0237: 'El gobierno argentino articula públicamente la ambición de convertir al país en 'uno de los cuatro...' Policy. <https://www.telesemana.com/blog/2024/12/02/argentina-trabaja-en-desregulacion-energia-y-analisis-de-marcos-normativos-para-convertirse-en-el-hub-de-la-inteligencia-artificial-de-sudamerica/>. Accessed 2026-05-29.
- 299 AR-EV-0238: 'La fundación Fundar argumenta que la estrategia de IA del gobierno Milei tiene un 'talón de...' Analysis. <https://fund.ar/publicacion/la-estrategia-de-milei-en-inteligencia-artificial-tiene-un-talon-de-aquiles/>. Accessed 2026-05-29.
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## Appendix A — Inventory of Cited Evidence

This report cites **120 distinct evidence identifiers** from the UNGS\_2026 corpus (out of a total of 241 integrated pieces of evidence). All cited identifiers exist and are traceable in evidence\_base\_UNGS\_2026.json.

**Table A.1.** Composition of cited evidence by type (approximate count).

Evidence type	Citations
Regulation	41
Data	28
CaseStudy	21
Policy	19
Gap	11
Report	9
Analysis	6

**Table A.2.** Distribution by source tier.

Tier	Description	Approximate share
Tier-1	Official domains (*:gob.ar, InfoLEG, Boletín Oficial)	~52%
Tier-2	Academic, regional bodies, specialised press	~30%
Tier-3	Single market sources / industry analysis	~18%

The following table summarises the composition of the cited evidence by type and source tier; the detail by identifier appears in the preceding References section.

**Table A.3.** Count of integrated evidence by indicator (full corpus, from evidence\_index\_UNGS\_2026.json).

Ind.	Evidence	Gaps	Ind.	Evidence	Gaps
1.1	15	1	3.1	21	1
1.2	16	1	3.2	19	2
1.3	22	1	3.3	11	3
1.4	17	6	3.4	12	3
2.1	15	2	4.1	17	1
2.2	19	3	4.2	19	1
2.3	16	2	4.3	16	1
2.4	14	1	4.4	18	1

## Appendix B — Documented Gaps

The UNGS\_2026 corpus records **31 gaps** under a strict policy (gap\_policy\_strict): confirmed absences of evidence after three rounds of search in Tier-1 sources, treated as evidence of a structural absence. They are enumerated by dimension.

### Dimension 1 (9 gaps)

- 1.1 — GDPR-era modernisation absent: no regulated breach notification, mandatory DPIA, DPO figure, or extraterritorial clause in the text in force.
- 1.2 — No localisation-enforcement actions (2024–2026): a structural absence, there is no general mandate to enforce.
- 1.3 — No quantitative cross-border transfer-enforcement statistics published by the AAIP.
- 1.4 (×6) — Antitrust over data monopolies non-existent; open-data outcome audit pending; operative B2G mandate absent; institutional data trusts absent; OECD Pillar One/Two not implemented; recognition of data as a factor of production absent.

### Dimension 2 (9 gaps)

- 2.1 (×2) — No Tier-1 data on domestic-vs-imported hardware share in public procurement; no active strategic hardware-stockpile programme.
- 2.2 (×3) — No Tier-1 quantification of public spending on foreign proprietary-provider licences; no documented event of sanctions/export controls on foundational software; no domestic capacity in kernels, hypervisors, or cryptographic libraries at scale.
- 2.3 (×2) — No auditable ERP/CRM/SCM breakdown by provider origin; no official metrics of the domestic-vs-foreign share in public spending on application software.

- 2.4 (×2) — No sustained domestic academic cryptographic publication at top-tier venues; no state red-team programme with public outputs.

### Dimension 3 (9 gaps)

- 3.1 — No binding national framework for coordinated vulnerability disclosure.
- 3.2 (×2) — No systematic data on judicial confirmation/revocation or decision times; no quantification of case-to-decision time or fine-collection rate.
- 3.3 (×3) — No surfaceable direct Argentine authorship of an IETF RFC; no declared Argentine SEPs or participation in post-quantum standardisation; no documented official technical positions on disputed standards ('New IP', AI security, quantum communication).
- 3.4 (×3) — Argentina absent from the AI-safety declarations (BletchLaw No., Seoul, Paris); absent from the 65 initial signatories of the Convention on Cybercrime; no signature of the China-led Global Data Security Initiative.

### Dimension 4 (4 gaps)

- 4.1 — No Tier-1 source with systematic annual counts of Argentine publications at top-tier AI venues.
- 4.2 — No disaggregated brain-drain rate in computer-science/AI subfields or directional flow of postgraduate students.
- 4.3 — No quantitative comparison of gross value added per worker vs. the OECD (PDF not retrievable).
- 4.4 — No Tier-1 dashboard of digital KPIs in the Presidency, JGM, or Economy tracking the CTI Plan 2030.

## Appendix C — Authorship, Cooperation, and Traceability

This Argentina assessment is a product of academic cooperation developed under the **Global South Academic Forum**, with the following division of roles:

- **Global South Insights (GSI) — DSI Assessment Team.** Design and specification of the Digital Sovereignty Index methodological framework (the 4×4 analytical structure: four dimensions, sixteen indicators, a 1–5 scale, seven evidence types, seven principles, and the decision tree), coordination of the international assessment, and compilation of the annual global index.

- **National University of General Sarmiento (UNGS) — University Programme on Digital Sovereignty.** Implementation of the Argentina assessment as an associate university: evidence collection from national sources, local application of the assessment pipeline in accordance with the DSI specifications, and drafting of the analysis in Argentine academic Spanish.

- **Global South Academic Forum (GSAF)** . Institutional framework of the cooperation.

- **Artificial-intelligence assistance.** Evidence processing, verification, and drafting were assisted by the Claude model (Anthropic) — Co-authored-by: Claude.

The application of the specifications to the Argentine situation — what national evidence is sufficient, what evidentiary weight corresponds to each local regulatory action, and how the analysis is written in Spanish — constitutes UNGS's substantive contribution to the global index, in line with the methodology established by GSI.

**Corpus traceability. Run:** UNGS\_2026. Phase-gate results: Phase 1 (collection, 373 pieces of evidence) → verification (91 removed) → integration (41 duplicates removed, 241 integrated + 31 gaps) → Phase 4 (assessment, 16 indicators) → Phase 5 (generation of this report). The evidence base (evidence\_base\_UNGS\_2026.json) and the indexes (evidence\_index\_UNGS\_2026.json) constitute the audit trail; each [AR-EV-NNN] citation in the report is verifiable against a corpus URL. Report generation date: 29 May 2026. The 2025 assessment is preserved as a comparative baseline.