



EUROPEAN COMMISSION

DIRECTORATE-GENERAL FOR COMMUNICATIONS NETWORKS, CONTENT AND TECHNOLOGY

Cybersecurity and Trust
The Director (acting)

Brussels
CNECT.H.4.002/JD

epicenter.works
team@epicenter.works

Subject: Reply to the open letter of 10 March 2026 on the fourth batch of eIDAS Implementing Acts

Dear Sir/Madam,

I would like to thank epicenter works, European Digital Rights (EDRi) and the co-signatory organisations for their open letter of 10 March 2026 concerning the fourth batch of implementing acts drafted under Regulation (EU) No 910/2014 (“the Regulation”).⁽¹⁾ This letter was registered under reference Ares(2026)2594392.

I welcome this contribution and the commitment to strengthening privacy safeguards. I share the objective that the European Digital Identity Wallet (“wallets”) must guarantee strong protection of personal data, prevent tracking and tracing, and ensure that users remain in full control of their data. These principles are at the core of the Regulation.

Let me respond to the specific points you raise in your open letter:

As regards the **protection against excessive data requests**, safeguards operate at multiple, mutually reinforcing levels and do not depend on the mandatory issuance of wallet-relying party registration certificates in every Member State. The protection is established directly by Article 5b(3) of the Regulation, which requires that relying parties not request data beyond what was declared at registration as necessary for their intended use. This obligation is binding in all Member States irrespective of whether wallet-relying party registration certificates are issued.

The implementing acts reinforce this protection. Registrars are required to verify the information provided by relying parties at registration — including their entitlements and declared intended use — and to reject applications they cannot verify. Article 9(2)(c)

⁽¹⁾ Regulation (EU) No 910/2014 of the European Parliament and of the Council of 23 July 2014 on electronic identification and trust services for electronic transactions in the internal market and repealing Directive 1999/93/EC (OJ L 257, 28.8.2014, p. 73), as amended by Regulation (EU) 2024/1183 of the European Parliament and of the Council of 11 April 2024 amending Regulation (EU) No 910/2014 as regards establishing the European Digital Identity Framework (OJ L, 2024/1183, 30.4.2024, ELI: <http://data.europa.eu/eli/reg/2024/1183/oj>).

of Implementing Regulation (EU) 2025/848 ⁽²⁾ provides that registrars may suspend or cancel the registration of a relying party that requests more attributes than it has registered. Furthermore, the selective disclosure feature of the wallets ensures that relying parties can request the minimal number of attributes.

As regards the **right to use pseudonyms**, this right is established by Article 5 of the Regulation as a general principle and specifically by Article 5b(9) in the wallet context. Article 5b(9) requires that relying parties shall not refuse the use of pseudonyms where identification of the user is not required by Union or national law. These provisions are directly applicable and do not require further implementation to produce legal effect. Relying parties are further required to declare at registration the data they intend to request and their intended use, pursuant to Article 5b(2)(c) of the Regulation and Article 5 of Implementing Regulation (EU) 2025/848.

As regards the **inclusion of a portrait in the person identification dataset**, this element is intended to support the verification of the identity of the wallet user where genuinely needed. The selective disclosure feature ensures that the portrait is presented only where it is requested by a relying party and the user has approved its disclosure. A portrait cannot, for example, be requested for simple age verification. The amendment in the revised implementing act to make the portrait a mandatory instead of an optional part of the personal identification data ensures that all wallets can support use cases in which strong assurance about the identity of the presenting person is genuinely needed without creating fragmentation across Member States. Regulation (EU) 2016/679 applies to all personal data processing activities of the European Digital Identity Wallets.

I take note of the concerns raised regarding the technical specifications for **authentication by very large online platforms**. The obligation under Article 5f(3) of the Regulation requires very large online platforms to accept and facilitate the use of the wallet for user authentication upon the voluntary request of the user, and in respect of the minimum data necessary for the specific online service. This obligation, together with the right to use pseudonyms under Article 5b(9), applies directly to very large online platforms and is not affected by the specific technical specifications in the implementing acts.

As regards **unlinkability**, Article 5a(16) of the Regulation requires the technical framework of the wallet not to allow tracking, linking or correlating of transactions or user behaviour, and to enable techniques that ensure unlinkability where identification is not required. This obligation is binding on the overall technical framework. Article 3(10) of Implementing Regulation (EU) 2024/2982 ⁽³⁾ operationalises this by requiring wallet units to enable privacy-preserving techniques that ensure unlinkability in the relevant contexts. The draft implementing acts maintain this standard in full.

⁽²⁾ Commission Implementing Regulation (EU) 2025/848 of 6 May 2025 laying down rules for the application of Regulation (EU) No 910/2014 of the European Parliament and of the Council as regards the registration of wallet-relying parties (OJ L, 2025/848, 7.5.2025, ELI: http://data.europa.eu/eli/reg_impl/2025/848/oj).

⁽³⁾ Commission Implementing Regulation (EU) 2024/2982 of 28 November 2024 laying down rules for the application of Regulation (EU) No 910/2014 of the European Parliament and of the Council as regards protocols and interfaces to be supported by the European Digital Identity Framework (OJ L, 2024/2982, 4.12.2024, ELI: http://data.europa.eu/eli/reg_impl/2024/2982/oj).

I value the input you provided and remain available for further technical exchange on the matters raised.

Yours faithfully,

Electronically signed

Christiane
KIRKETERP DE VIRON