To the attention of the European Data Protection Board

Subject: Contribution on the Guidelines 02/2026 on Anonymisation

Submitted by: Dedalus SpA

Clarification of thresholds for assessing re-identification risk

Dedalus welcomes the risk-based approach reflected in the Guidelines 02/2026 on Anonymisation. However, Dedalus considers that further clarification is needed regarding the **thresholds** used throughout the Guidelines **to assess re-identification risk.** In particular, Dedalus recommends that the EDPB provide more concrete and, where technically feasible, quantitative criteria or indicative benchmarks for concepts such as "**insignificant**" probability of re-identification, "**with certainty or high likelihood**" and "**sufficiently high confidence**". Such concepts should, to the greatest extent possible, be linked to defined numerical thresholds or measurable risk metrics. Without objective and quantifiable parameters, organisations may reach materially different conclusions when assessing the same anonymisation scenario, undermining legal certainty and the consistent application of the Guidelines.

Further guidance in this respect, potentially building on recognised technical standards and methodologies, would significantly enhance the practical applicability of the Guidelines by enabling controllers to assess, document, and demonstrate, in an objective and auditable manner, whether the relevant threshold has been met.

This approach would help reduce divergent interpretations, foster greater consistency in the application of the Guidelines, and provide organisations with a more robust basis for demonstrating and documenting compliance with the applicable anonymisation requirements.

On behalf of Dedalus Group

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