Contribution to guidelines on Anonymisation:

We thank you a lot for the possibility of contributing and have the following remarks from a consumer's perspective:

The clarification in Para 15 is welcomed. It is important to highlight the concept of processor to prevent them from circumventing the GDPR.
The guidelines should also clarify what happens in case of joint controllers in line with Art 26 GDPR.

Regarding para 18 to 22, it should be clarified how and when information obligations regarding Art 13 till 15 GDPR shall be fulfilled and how the rights regarding Art 16 till 19 GDPR can be exercised.
We highly welcome that the concept of "means reasonably likely to be used" – as elaborated by the CJEU e.g. in C-413/23 – should be understood broadly. It should be mentioned that given the risen use of AI systems the means reasonably likely to be used are increasing. See also the highly welcomed reference to Agentic AI in the context of (re-)identification techniques in Para 91 et seqq. or the reference to "advances in the technology" in Para 35.

The wording "if there is sufficient evidence of a concrete risk" in para 33 should be aligned with the wording of the CJEU-ruling C-582/14 in its para 46:

"Thus, as the Advocate General stated essentially in point 68 of his Opinion, that would not be the case if the identification of the data subject was prohibited by law or practically impossible on account of the fact that it requires a disproportionate effort in terms of time, cost and man-power, so that the risk of identification appears in reality to be insignificant."

So, the wording in Para 33 should be changed as follows: " […] if there is a significant risk of identification in reality".