Comments to the EDPB's Guidelines on Web Scraping (July 2026)

- **Note re: page 18: "Position of the data subject":** This appears to be vague language and needs further clarification and examples.
- **Note re: page 21:** "The responsibilities, powers and capabilities when web scraping in the context of the development of generative AI models" is a sentence fragment.
- **Note re: page 22 at iv**: "should also be considered is necessary." Is this "if"?
- **Overall**: There are a number of footnotes in non-standard font formatting that need updating.