Subject: Comment on EDPB Guidelines 02/2025 on Blockchain Technology and Data Protection

I would like to formally express my opposition to the current version of the “Guidelines 02/2025 on processing of personal data through blockchain technologies”.

In my view, these guidelines are unbalanced from both a technological and legal perspective, and they risk severely hindering innovation in decentralized systems such as Bitcoin, while failing to appropriately assess the real level of risk to data subjects.

1. Unrealistic interpretation of pseudonymity
The guidelines treat pseudonymous blockchain addresses as personal data, even though identification is often not realistically possible using reasonably likely means. This interpretation goes beyond Recital 26 of the GDPR and leads to a blanket classification of on-chain activity as personal data processing—even in the absence of any viable re-identification risk.

2. Overreliance on erasure and rectification rights
The demand that blockchain systems must support the erasure or correction of data ignores the essential design feature of public blockchains: immutability. This feature is not a flaw—it is a safeguard against manipulation and censorship. Demanding retroactive changeability undermines system integrity and creates a conflict between technological legitimacy and data protection formalism.

3. Risk-focused without recognizing privacy potential
The guidelines emphasize the risks of blockchain use but largely neglect to highlight its privacy-enabling capabilities—such as zero-knowledge proofs, self-sovereign identities, or privacy-by-design smart contracts. The result is a document that appears ideologically opposed to blockchain rather than providing constructive, differentiated guidance.

4. De facto exclusion of public blockchains
The cumulative effect of the guidelines is to make any GDPR-compliant use of public, permissionless blockchains nearly impossible. This could effectively eliminate the legal use of core blockchain technologies in the EU, limiting access to decentralized innovations and conflicting with fundamental rights to technological participation.

Conclusion:
I call for a substantial revision of these guidelines to allow for a **proportionate, technology-neutral, and risk-aware** application of the GDPR to blockchain technologies. Applying traditional privacy concepts to decentralized systems without adaptation leads to regulatory overreach and stifles innovation in one of the most promising digital technologies of our time.