📬 EDPB Submission

To the EDPB Secretariat,

We are the MARTHOS Project Team, developing a **human-driven, collaboration-oriented blockchain-based data protection system** designed to ensure GDPR compliance while preserving the integrity of AI training data.

In accordance with Article 70(4) of the GDPR and the EDPB's consultation procedure, we respectfully submit the following technical, ethical, and structural proposals regarding the draft *"Guidelines 02/2025 on the Processing of Personal Data through Blockchain Technologies."*

◇ 1. Recognition of "Invisibility" Measures for the Right to Erasure

Where complete on-chain deletion is technically infeasible, we propose that the guidelines explicitly recognize **off-chain deletion combined with link nullification ("invisibility structure")** as a valid method of fulfilling the right to erasure under Article 17 GDPR.

◇ 2. Addition of Use Cases Related to AI Training Data

Blockchain is increasingly used to **track provenance, verify consent, and manage rights over AI training datasets**, with direct relevance to Articles 6(1)(a), 17, and 20 GDPR.

We propose including a **dedicated use case** in the guidelines to address AI training data protection in decentralized environments.

◇ 3. Guidance on Smart Contract-based Consent Management

The MARTHOS system allows individuals to **grant, update, and withdraw consent dynamically** through smart contracts recorded on blockchain.

We kindly request that the guideline incorporate best practices or examples illustrating GDPR-compliant **real-time consent mechanisms**, following the model: **"Consent → Status Storage → Blockchain Recording → Withdrawal Possible."**

◇ 4. Ethical Governance via Trust Protocol and Donation-based Penalty Model

Our platform integrates a **trust score-based governance model**, where users' trust levels influence their data rights, and violations automatically trigger **penalty donations** to public-interest organizations through transparent smart contracts.

We seek the EDPB's view on whether such incentive-aligned governance structures could be embraced under future GDPR-aligned best practices.

◇ 5. Feedback on Emotion Data Protection, "Emotion NFTs," and "Emotion DAO Constitution"

MARTHOS is pioneering a **self-sovereign framework for emotion data**, where anonymized emotional states are tokenized as **Emotion NFTs** and governed by a **DAO Constitution (DAO憲章)** ensuring declared rights and ethical control over emotion data flow.

This approach is founded on the philosophical principle that **emotions are personal expressions of human dignity and identity**, aligning with Article 9 GDPR regarding sensitive data, and it defines ethical boundaries for the responsible anonymized processing and sharing of emotional information.

We respectfully request the EDPB's perspective on incorporating **Emotion NFTs and DAO-based emotional data governance** into future guideline extensions or as structured ethical exceptions.

At MARTHOS, we believe that AI should exist not as a substitute for human will or emotions, but as a companion that supports human autonomy, reflection, and growth.
We are committed to designing systems where AI collaborates thoughtfully with humans,
while ensuring that ultimate decision-making, ownership of emotions, and the right to meaning remain firmly with the individual.

🔨 Please note:

We respectfully request **partial anonymity** for this submission (organization and personal names not to be publicly disclosed).

For any follow-up communication, please contact us at marthos_po@naver.com

Thank you very much for your consideration.

Sincerely,

The MARTHOS Project Team