

Individual Concern on the Possible Impact of EDPB Blockchain Guidelines on the Bitcoin Blockchain

As a private individual who uses Bitcoin legally and responsibly, I want to express concern about how the EDPB Blockchain Guidelines could be interpreted by EU institutions and Member States.

Bitcoin is a decentralized, open-source protocol that operates without a central authority or data controller. It is designed to ensure transparency, censorship resistance, and individual sovereignty. Bitcoin does not collect or process personal data by default; any such linkage happens off-chain, typically through regulated service providers such as exchanges, custodians, or wallet applications. The protocol itself does not process personal data.

Concerns:

- The current language in the guidelines could lead some Member States or regulators to treat public decentralized blockchains like Bitcoin as if they were centralized data systems, subjecting them to GDPR obligations that are technically infeasible and legally inappropriate.
- This could discourage innovation, restrict usage, or even create fear among developers, users, and researchers.
- Bitcoin's principles—open access, immutability, decentralization—are aligned with privacy, security, and freedom. It should not be unintentionally penalized or lumped together with private blockchains or enterprise systems that do process personal data.

What I ask:

- Please consider adding language to the final guidelines that clearly:

Distinguishes decentralized, public, permissionless blockchains (like Bitcoin and similar protocols) from permissioned or enterprise systems;

Clarifies that GDPR obligations apply to actors who link personal data to blockchain activity, not to the protocol itself;

Avoids framing that could be interpreted as a de facto ban or compliance impossibility for Bitcoin and similar open-source technologies.

I appreciate the EDPB's efforts to ensure data protection in the digital age. I simply hope that essential

infrastructure like Bitcoin can coexist with EU law in a way that respects both privacy rights and technological freedom.

Respectfully,

A concerned EU resident and Bitcoin user