**To whom it may concern,**

I am writing in response to the public consultation on the EDPB Guidelines 02/2025 concerning the processing of personal data through blockchain technologies.

The draft rightly affirms that public blockchain addresses may constitute personal data (§ 3.2), and that data subjects must retain their rights to erasure and rectification (§ 4.2-4.3), even in the context of immutable infrastructures like Bitcoin. However, the current text leads to an unsolvable contradiction with the European anti-money laundering (AML) framework.

The only mitigation measure proposed — irreversible anonymisation before writing on-chain — is **expressly restricted or criminalised** across the EU:

- **TFR 2023/1113** identifies mixers, tumblers, and privacy wallets as high-risk tools, and mandates identification of all parties involved in a transfer.
- **AMLR 2024/1624** forbids CASPs from offering or maintaining any service that facilitates anonymised transactions.
- **The 2025 French "Narcotrafic" law** establishes a presumption of money laundering for any transaction using privacy-enhancing tools.
- **The Dutch Tornado Cash ruling** deems anonymity tools inherently criminal due to their "design and intent".

In summary:

- If one anonymises data → GDPR is satisfied, but AML is violated.
- If one does not anonymise → AML is satisfied, but GDPR is violated.

This creates a **regulatory deadlock** where lawful use of public blockchains, including Bitcoin, becomes structurally impossible — despite no explicit ban.

Such an outcome would result in the **de facto illegality** of decentralised technologies across the EU, severely damaging innovation, financial inclusion, and digital sovereignty. It would further isolate Europe from the growing global blockchain ecosystem, leaving our citizens and companies at a competitive disadvantage.

## I respectfully urge the EDPB to:

- Recognise this regulatory incompatibility and seek alignment with AML/CFT frameworks.
- Avoid assumptions that lead to blanket criminalisation of privacy-preserving tools.
- Promote a balanced, technically grounded, and innovation-friendly interpretation of the GDPR in the context of decentralised networks.

Thank you for considering this contribution to the public consultation.

Sincerely,