

Dear Members of the European Data Protection Board,

As a European citizen, I am writing to express my concerns regarding the draft **Guidelines 02/2025 on the processing of personal data through blockchain technologies**, currently under public consultation.

While I fully support the objectives of the GDPR and the fundamental right to data protection, I am concerned that certain recommendations in the draft guidelines—if applied without nuance—could **render the use of public blockchains like Bitcoin de facto illegal within the EU**, or at the very least create significant legal uncertainty.

## Key Concerns

### 1. Immutability vs. Right to Erasure:

The inherent immutability of public blockchains conflicts with the right to erasure under the GDPR. The guidelines suggest that the inability to delete data does not exempt blockchain systems from compliance. This could effectively criminalize participation in networks like Bitcoin, where data deletion is technically impossible.

### 2. Node Operators as Joint Controllers:

The suggestion that individual node operators in decentralized networks could be considered joint data controllers introduces significant legal risk. This may deter individuals and businesses from participating in or supporting public blockchain infrastructure, threatening the decentralization that defines these systems.

### 3. Preference for Permissioned Systems:

The document appears to favor permissioned or private blockchains. While such systems have their place, a regulatory framework that discourages public blockchains could **leave Europe behind in the global development of open, decentralized technologies**.

## Recommendations

I respectfully propose that the EDPB consider the following:

- **Recognize the technical uniqueness of public blockchains** and seek a differentiated approach that balances privacy rights with the operational realities of decentralized systems.
- **Encourage innovation in privacy-preserving technologies**, such as zero-knowledge proofs, hashed references, or off-chain data storage, to help reconcile GDPR principles with blockchain design.
- **Avoid a one-size-fits-all interpretation** by clearly distinguishing between public, permissioned, and hybrid systems, and by assessing risk based on specific use cases.

Thank you for the opportunity to contribute to this consultation. I believe that with the right regulatory approach, Europe can remain a leader in innovation while upholding its strong commitment to individual rights and data protection.

Sincerely,

Arnaud Campagne  
French citizen  
Paris, May 23rd, 2025