

Dear EDPB Secretariat,

I would like to express my strong opposition to the Guidelines 02/2025 on the processing of personal data through blockchain technologies.

While I fully support the fundamental rights to data protection and privacy, I believe the current draft takes an overly restrictive and impractical approach to blockchain—one that threatens to stifle innovation, competitiveness, and technological progress within the European Union.

Blockchain, by design, introduces decentralization and immutability as key technological principles. Imposing rigid interpretations of concepts such as data controllership, erasure rights, and data minimization—without adapting these

principles to the realities of decentralized networks—creates significant legal uncertainty and may render many use cases unfeasible in the EU.

Such a position not only risks pushing innovation and investment outside of Europe but also fails to recognize the growing importance of blockchain for secure, transparent, and privacy-enhancing applications such as identity management, supply chain tracking, and decentralized finance.

I urge the EDPB to:

Engage more closely with technical experts and innovators in the blockchain field;

Consider flexible interpretations of GDPR obligations for decentralized technologies;

Promote a technology-neutral and innovation-friendly regulatory environment that balances protection with practicality.

Respectfully, these guidelines in their current form may lead to overregulation that hinders rather than protects European citizens and industries. A more nuanced and forward-looking framework is needed—one that reflects both the spirit of data protection and the technical characteristics of blockchain systems.

Thank you for considering this feedback.

Best regards,

Marc