

# Criticism of the EDPB Blockchain Guidelines

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## Introduction

On April 14, 2025, the European Data Protection Board (EDPB) published Guidelines 02/2025 on the processing of personal data through blockchain technologies, which are open for public consultation until June 9, 2025. These guidelines aim to assist organizations in complying with the General Data Protection Regulation (GDPR) but have faced significant criticism within the blockchain community, particularly on social media platforms like X. This report summarizes the main points of criticism raised in posts on X.

## Criticisms of the EDPB Guidelines

The criticism of the EDPB guidelines centers on several key issues that conflict with the fundamental principles of blockchain technology and the requirements of the GDPR.

1. **Classification of public keys as personal data:** The EDPB classifies public keys in blockchains as personal data. Critics argue that this endangers user privacy and significantly complicates the use of public blockchains like Bitcoin or Ethereum. *EDPB guidelines classify public keys as personal data* [3].
2. **Conflict with blockchain immutability:** The GDPR mandates rights such as the right to erasure (right to be forgotten). However, the immutability of blockchains makes it impossible to delete or modify data retroactively. The EDPB suggests that in such cases, the entire blockchain would need to be deleted, which critics deem impractical: *This is like asking to delete the internet to enforce privacy* [1].
3. **Threat to decentralization:** The guidelines favor permissioned blockchains, where access rights are restricted. This contradicts the principle of decentralization, which is central to many blockchain applications. Critics fear this will hinder innovation in decentralized technologies [1].
4. **Collision of data protection and KYC regulations:** The EU pursues both data protection and Know-Your-Customer (KYC) regulations, which conflict within the guidelines. *The EU wants privacy. The EU enforces KYC. These two goals collide* [2]. This creates uncertainty for blockchain users and developers.
5. **Risk of blockchain illegalization:** Some voices warn that, if implemented in

their current form, the guidelines could effectively render public blockchains like Bitcoin illegal. *If approved, Bitcoin could become de facto illegal* [3].

## Conclusion

The EDPB Guidelines 02/2025 represent a misguided attempt to align blockchain technology with the GDPR, threatening to undermine the core principles of blockchain. If these guidelines are adopted in their current form, the consequences could be severe: public blockchains like Bitcoin and Ethereum could become effectively unusable in the EU, as the classification of public keys as personal data and the infeasibility of implementing the right to erasure would de facto prohibit their use. The preference for permissioned blockchains would erode decentralization, a core feature of blockchain, stifling innovation in cryptocurrencies and decentralized applications. Furthermore, the conflicting requirements of data protection and KYC regulations create a regulatory minefield, plunging developers and businesses into legal uncertainty.

## References

- [1] @EuCInitiative, X Post, 03.06.2025, <https://t.co/x1QXups56H>.
- [2] @pa\_bitcoin, X Post, 05.06.2025, .  
@SnapMediaLive, X Post, 05.06.2025.