

## **EDPS Formal comments on the draft Commission Implementing Regulation amending Implementing Regulation (EU) 2024/2977, (EU) 2024/2979, (EU) 2024/2980 and (EU) 2024/2982 as regards applicable standards and specifications and correcting Implementing Regulation (EU) 2024/2980**

### **THE EUROPEAN DATA PROTECTION SUPERVISOR,**

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Regulation (EU) No 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of individuals with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC ('EUDPR')<sup>1</sup>, and in particular Article 42(1) thereof,

### **HAS ADOPTED THE FOLLOWING FORMAL COMMENTS:**

#### **1. Introduction and background**

1. On 20 February 2026, the European Commission consulted the EDPS on the draft Commission Implementing Regulation amending Implementing Regulation (EU) 2024/2977<sup>2</sup>, Implementing Regulation (EU) 2024/2979<sup>3</sup>, Implementing Regulation (EU) 2024/2980<sup>4</sup> and Implementing Regulation (EU) 2024/2982<sup>5</sup> as regards applicable standards and specifications and correcting Implementing Regulation (EU) 2024/2980 ('the draft implementing regulation').
2. The draft implementing regulation would be adopted pursuant to Article 5a(23) of Regulation (EU) No 910/2014 ('the basic act')<sup>6</sup>. The EDPS previously issued formal

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<sup>1</sup> OJ L 295, 21.11.2018, p. 39.

<sup>2</sup> Commission Implementing Regulation (EU) 2024/2977 of 28 November 2024 laying down rules for the application of Regulation (EU) No 910/2014 of the European Parliament and of the Council as regards person identification data and electronic attestations of attributes issued to European Digital Identity Wallets, OJ L, 2024/2977, 4.12.2024, ELL: [http://data.europa.eu/eli/reg\\_impl/2024/2977/oj](http://data.europa.eu/eli/reg_impl/2024/2977/oj).

<sup>3</sup> Commission Implementing Regulation (EU) 2024/2979 of 28 November 2024 laying down rules for the application of Regulation (EU) No 910/2014 of the European Parliament and of the Council as regards the integrity and core functionalities of European Digital Identity Wallets, OJ L, 2024/2979, 4.12.2024, ELL: [http://data.europa.eu/eli/reg\\_impl/2024/2979/oj](http://data.europa.eu/eli/reg_impl/2024/2979/oj).

<sup>4</sup> Commission Implementing Regulation (EU) 2024/2980 of 28 November 2024 laying down rules for the application of Regulation (EU) No 910/2014 of the European Parliament and of the Council as regards notifications to the Commission concerning the European Digital Identity Wallet ecosystem, OJ L, 2024/2980, 4.12.2024, ELL: [http://data.europa.eu/eli/reg\\_impl/2024/2980/oj](http://data.europa.eu/eli/reg_impl/2024/2980/oj).

<sup>5</sup> Commission Implementing Regulation (EU) 2024/2982 of 28 November 2024 laying down rules for the application of Regulation (EU) No 910/2014 of the European Parliament and of the Council as regards protocols and interfaces to be supported by the European Digital Identity Framework, OJ L, 2024/2982, 4.12.2024, ELL: [http://data.europa.eu/eli/reg\\_impl/2024/2982/oj](http://data.europa.eu/eli/reg_impl/2024/2982/oj).

<sup>6</sup> Regulation (EU) No 910/2014 of the European Parliament and of the Council of 23 July 2014 on electronic identification and trust services for electronic transactions in the internal market and repealing Directive 1999/93/EC, OJ L 257, 28.8.2014, pp. 73–114.

comments on the basic act<sup>7</sup>. The EDPS also issued formal comments on the draft implementing regulations adopted as Implementing Regulation (EU) 2024/2977<sup>8</sup>, (EU) 2024/2979<sup>9</sup>, (EU) 2024/2980<sup>10</sup> and (EU) 2024/2982<sup>11</sup>.

3. The objective of the draft implementing regulation is to adapt certain standards to take into account the new standards, specifications and procedures of the European Digital Identity Wallet ('EUDIW') architecture and reference framework<sup>12</sup>.
4. The draft implementing regulation is accompanied by fourteen annexes, setting out: (1) technical specifications for person identification data<sup>13</sup>; (2) cryptographic mechanisms<sup>14</sup>; (3) technical specifications for wallet instance attestations and wallet unit attestations<sup>15</sup>; (4) the list of standards referred to in Article 6(3)<sup>16</sup> of Implementing Regulation (EU) 2024/2979; (5) the list of standards referred to in Article 8<sup>17</sup> of Implementing Regulation (EU) 2024/2979; (6) technical specifications referred to in Article 10<sup>18</sup> of Implementing Regulation (EU) 2024/2979; (7) amendments to Annex IV, point 1<sup>19</sup> of Implementing Regulation (EU) 2024/2979; (8) technical specifications for pseudonym generation referred to in Article 14<sup>20</sup> of Implementing Regulation (EU) 2024/2979; (9) the logo of the EU Digital Identity Wallet Trust Mark in colour<sup>21</sup>; (10) the logo of the EU Digital Identity Wallet Trust Mark in black and white<sup>22</sup>; (11) EU Digital Identity Wallet Trust Mark data<sup>23</sup>; (12) amendments to Annex II, Section 1, point 1(i), of Implementing Regulation (EU) 2024/2980<sup>24</sup>; (13) Annex I, Protocols and interfaces referred to in Article 4 of Implementing Regulation (EU) 2024/2982<sup>25</sup>; (14) Annex II, Technical specifications referred to in Article 5 of Implementing Regulation (EU) 2024/2982<sup>26</sup>.
5. The present formal comments of the EDPS are issued in response to a consultation by the European Commission pursuant to Article 42(1) of EUDPR. The EDPS welcomes the reference to this consultation in recital 4 of the draft implementing regulation.

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<sup>7</sup> [EDPS Formal comments on the Proposal for a Regulation of the European Parliament and of the Council amending Regulation \(EU\) No 910/2014 as regards establishing a framework for a European Digital Identity](#), issued on 28 July 2021.

<sup>8</sup> [EDPS Formal comments on the draft Commission Implementing Regulation \(EU\) laying down rules for the application of Regulation \(EU\) No 910/2014 of the European Parliament and of the Council as regards person identification data and electronic attestations of attributes issued to European Digital Identity Wallets](#), issued on 30 September 2024.

<sup>9</sup> [EDPS Formal comments on the draft Commission Implementing Regulation \(EU\) laying down rules for the application of Regulation \(EU\) No 910/2014 of the European Parliament and of the Council, as regards the integrity and core functionalities of European Digital Identity Wallets](#), issued on 30 September 2024.

<sup>10</sup> [EDPS Formal comments on the draft Commission Implementing Regulation \(EU\) for the application of Regulation \(EU\) No 910/2014 of the European Parliament and of the Council as regards notifications to the Commission concerning the European Digital Identity Wallet Ecosystem](#), issued on 30 September 2024.

<sup>11</sup> [EDPS Formal comments on the draft Commission Implementing Regulation \(EU\) laying down rules for the application of Regulation \(EU\) No 910/2014 of the European Parliament and of the Council as regards protocols and interfaces to be supported by the European Digital Identity Wallets](#), issued on 30 September 2024.

<sup>12</sup> Recital 1 of the draft implementing regulation.

<sup>13</sup> Annex I to the draft implementing regulation.

<sup>14</sup> Annex II to the draft implementing regulation.

<sup>15</sup> Annex III to the draft implementing regulation.

<sup>16</sup> Annex IV to the draft implementing regulation.

<sup>17</sup> Annex V to the draft implementing regulation.

<sup>18</sup> Annex VI to the draft implementing regulation.

<sup>19</sup> Annex VII to the draft implementing regulation.

<sup>20</sup> Annex VIII to the draft implementing regulation.

<sup>21</sup> Annex IX to the draft implementing regulation.

<sup>22</sup> Annex X to the draft implementing regulation.

<sup>23</sup> Annex XI to the draft implementing regulation.

<sup>24</sup> Annex XII to the draft implementing regulation.

<sup>25</sup> Annex XIII to the draft implementing regulation.

<sup>26</sup> Annex XIV to the draft implementing regulation.

6. These formal comments do not preclude any additional comments by the EDPS in the future, in particular if further issues are identified or new information becomes available, for example as a result of the adoption of other related implementing or delegated acts<sup>27</sup>.
7. Furthermore, these formal comments are without prejudice to any future action that may be taken by the EDPS in the exercise of his powers pursuant to Article 58 of the EUDPR and are limited to the provisions of the draft implementing regulation that are relevant from a data protection perspective.

## **2. Comments**

### **2.1. General comments**

8. The EDPS notes that the implementation of the draft implementing regulation entails the processing of personal data, as well as access to terminal equipment within the meaning of the Directive 2002/58/EC ('ePrivacy Directive')<sup>28</sup>. Therefore, the EDPS recommends adding a reference to the applicability of Regulation (EU) 2016/679 ('the GDPR')<sup>29</sup> and of the ePrivacy Directive in a recital to the draft implementing regulation.

### **2.2. Specific comments**

#### **2.2.1. On the amendments to Implementing Regulation (EU) 2024/2977**

9. The EDPS notes that the draft implementing regulation would replace the annex to the Implementing Regulation (EU) 2024/2977 with Annex I to the draft implementing regulation<sup>30</sup>. The EDPS notes that table 1 of the Annex, listing the mandatory person identification data for the natural person, contains, as an additional data identifier (not included in the current Annex to the Implementing Regulation (EU) 2024/2977), "portrait", defined as "facial image of the wallet user".
10. The EDPS considers that including a source of possible biometric data (i.e., the facial image of the wallet user in the format prescribed)<sup>31</sup> as mandatory identification data, may constitute an increased risk for the fundamental rights to privacy and to the protection of personal data of natural persons. The recitals to the draft implementing regulation offer no justification for the inclusion of facial images among mandatory identification data.
11. The EDPS recommends carefully assessing the necessity and proportionality of such additional element as mandatory for all use cases in which users can make use of the wallet, and to consider in particular if this data identifier would not be better

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<sup>27</sup> In case of other implementing or delegated acts with an impact on the protection of individuals' rights and freedoms with regard to the processing of personal data, the EDPS would like to remind that he needs to be consulted on those acts as well. The same applies in case of future amendments that would introduce new or modify existing provisions that directly or indirectly concern the processing of personal data.

<sup>28</sup> Directive 2002/58/EC of the European Parliament and of the Council of 12 July 2002 concerning the processing of personal data and the protection of privacy in the electronic communications sector (Directive on privacy and electronic communications), OJ L 201, 31.7.2002, pp. 37–47.

<sup>29</sup> Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (Text with EEA relevance), OJ L 119, 4.5.2016, pp. 1–88.

<sup>30</sup> Article 1(4) of the draft implementing regulation.

<sup>31</sup> A biometric template could be extracted from the facial image of the wallet user as included in Table 1 of Annex 1 of the draft implementing regulation.

integrated among the optional data identifier listed in table 2 of Annex I to the draft implementing regulation. In any event, the EDPS recommends including an accompanying description specifying when it may be used (for which use cases) and specifying appropriate technical and organisational measures to prevent abuse. In the absence of these specifications, the EDPS recommends deleting the ‘portrait’ data identifier from Annex I, Table 1, of the draft implementing regulation.

12. The EDPS notes that Article 1(3) of the draft implementing regulation, amending Article 4(1) of Implementing Regulation (EU) 2024/2977, provides that electronic attestations of attributes must comply with at least one of the formats set out in Annex II to Implementing Regulation (EU) 2024/2979.
13. The EDPS notes that Annex II of the Implementing Regulation (EU) 2024/2979 is amended by Article 2(10) of the draft implementing regulation and replaced by Annex V of the draft implementing regulation, which refers to the new standard ETSI TS 119 472-1 V1.1.1 (2025-12)<sup>32</sup>. This standard mentions in its section 7.4 the possible use of BBS Cryptosuites, which provides for not only selective disclosure, but also proofs of unlikability, by referring to W3C Candidate Recommendation (3 April 2025): "Data Integrity BBS Cryptosuites v1.0". The EDPS welcomes such possible integration of protocols and procedures for the mitigation of the risk of user linkability.
14. Having regard to Implementing Regulation (EU) 2024/2977 and the formal comments already issued on the proposal for this implementing regulation<sup>33</sup>, the EDPS reiterates the following comments and recommendations.
15. The EDPS points out that the Implementing Regulation (EU) 2024/2977 provides that Member States must ensure that the set of person identification data attributes issued to a given wallet user is unique<sup>34</sup>. It also envisages an optional attribute consisting in the “personal administrative number” which is “unique among all personal administrative numbers issued by the provider of person identification data”<sup>35</sup>. Due to its uniqueness, this attribute may involve the risk of becoming the default identifier for the purposes of authentication and validation, linking to all other person identification data. The EDPS therefore welcomes the requirement, set out in the annex to the Implementing Regulation (EU) 2024/2977, according to which Member States (in case they opt to include this attribute), must describe - in their electronic identification schemes under which the person identification data is issued - the policy that they apply to the values of this attribute, including, where applicable, specific conditions for the processing of this value.
16. The EDPS considers that such policy should specify when (for which use cases) this optional attribute may be lawfully used by relying parties and include appropriate safeguards for the user, taking into account the risks to the rights and freedoms of the person concerned.
17. The EDPS recalls that, according to Article 87 of the GDPR, Member States may further determine the specific conditions for the processing of a national identification number or of any other identifier of general application. This may entail

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<sup>32</sup> [ETSI Technical Specification Electronic Signatures and Trust Infrastructures \(ESI\): Profiles for Electronic Attestation of Attributes; Part 1: General requirements](#), ETSI TS 119 472-1 V1.1.1 (2025-12).

<sup>33</sup> [EDPS Formal comments on the draft Commission Implementing Regulation \(EU\) laying down rules for the application of Regulation \(EU\) No 910/2014 of the European Parliament and of the Council as regards person identification data and electronic attestations of attributes issued to European Digital Identity Wallets](#), issued on 30 September 2024.

<sup>34</sup> Article 3(4) of Implementing Regulation (EU) 2024/2977.

<sup>35</sup> Table 2 of the Annex to Implementing Regulation (EU) 2024/2977.

that the identifier can only be used under appropriate safeguards for the rights and freedoms of the data subject, for instance clearly specifying the envisaged use cases of this identifier and restricting further use.

18. The EDPS notes that Implementing Regulation (EU) 2024/2977 provides for the possibility of revocation of person identification data and electronic attestations of attributes under specific circumstances<sup>36</sup>. The EDPS welcomes the requirement for providers of person identification data or electronic attestations of attributes to notify without delay the wallet users when their person identification data or electronic attestations of attributes are revoked, along with the reasons for the revocation<sup>37</sup>. At the same time, the EDPS recalls the need to ensure compliance with the data protection principle of storage limitation. Revocation of person identification data does not amount to its erasure. While revocation renders the data inactive, the data itself may still be stored. Therefore, the EDPS recommends specifying in the enacting terms of the draft implementing regulation the maximum retention period of the person identification data (or electronic attestations of attributes) that have been revoked<sup>38</sup>.
19. The EDPS notes that the Implementing Regulation (EU) 2024/2977 provides that where providers of person identification data or electronic attestations of attributes revoke person identification data and electronic attestations of attributes issued to wallet units, they must make publicly available the validity status of person identification data or electronic attestations of attributes they issue, in a privacy preserving manner, and indicate the location of that information in the person identification data or electronic attestations of attributes<sup>39</sup>. The EDPS emphasizes that while updated information about validity status is important, this publication should not reveal more person identification data or electronic attestations of attributes than necessary for the purpose of verifying validity.
20. The EDPS recalls that Article 5a(16) of the basic act states that the technical framework of the European Digital Identity Wallet must not allow providers of electronic attestations of attributes or any other party, after the issuance of the attestation of attributes, to obtain data that allows transactions or user behaviour to be tracked, linked or correlated, or knowledge of transactions or user behaviour to be otherwise obtained, unless explicitly authorised by the user. Having regard to the provisions on revocation, the EDPS highlights potential issues regarding linkability and tracking that may arise depending on how relying parties check the validity of personal identification data or attestations of attributes.
21. When relying parties verify at each transaction the validity status of personal identification data or attestations of attributes against an online resource, such access would reveal at least the online address of the relying party. This means that the party managing the online resource containing the revocation status could potentially learn on the basis of subsequent validity checks (who are) all the relying parties having access to the identification data or attributes they issue (for a given user).<sup>40</sup>

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<sup>36</sup> Article 5 of Implementing Regulation (EU) 2024/2977.

<sup>37</sup> Article 5(3) of Implementing Regulation (EU) 2024/2977.

<sup>38</sup> Article 5(6) of Implementing Regulation (EU) 2024/2977 provides that the revoked person identification data must remain accessible for as long as required by Union or national law, but they do not specify the requirement to delete the person identification data according to a specified data retention period.

<sup>39</sup> Article 5(7) of Implementing Regulation (EU) 2024/2977.

<sup>40</sup> EDPS [TechDispatch 3/2025 - Digital Identity Wallets](#), section 4.3.

22. To address this issue, the draft implementing regulation amending Regulation (EU) 2024/2977 should aim to protect against tracking and linkability as regards the validity checks by the relying parties, on the one hand, and the information available to providers of identity data and of attestations of attributes or any other party tasked to operate the validity register, on the other hand.
23. The EDPS notes that revocation-related linkability is mitigated by one-time or short-time validity credentials and welcomes that requirements in this regard have been introduced in the ETSI standard TS 119 471 V1.1.1 (2025-05)<sup>41</sup>. The EDPS recommends adding a reference to this standard in the draft implementing regulation having specific regard to the issue of revocation-related linkability.

### **2.2.2. On the amendments to Implementing Regulation (EU) 2024/2979**

24. The EDPS notes that Article 2(3) of the draft implementing regulation would insert a new Article 5a to Implementing Regulation (EU) 2024/2979. The new provisions require the use of cryptographic mechanisms as defined by the European Cybersecurity Certification Group, Sub-group on Cryptography<sup>42</sup> for the communication between wallet instances and for wallet secure cryptographic applications. The EDPS welcomes this provision, since it would provide harmonised standards for the use of cryptography and provide greater assurance of the use of state-of-the-art cryptographic mechanisms and protocols to ensure security and trustworthiness in the context of the EUDIW.
25. The EDPS notes that Article 2(9) of the draft implementing regulation would introduce the “EU Digital Wallet Trust Mark”<sup>43</sup>. The EDPS welcomes this addition, and particularly paragraph (2) of new Article 14a of Implementing Regulation (EU) 2024/2979, providing that “[w]allet providers shall ensure that wallet units enable wallet users to access information allowing them to verify the certification status of the wallet solution”, since this requirement helps to mitigate the risk of false certification claims.
26. The EDPS notes that Article 2(10) of the draft implementing regulation would replace Annex III of Implementing Regulation (EU) 2024/2979, providing a list of the common ‘embedded disclosure policies’ referred to in Article 10 of Implementing Regulation (EU) 2024/2979, with the technical specifications listed in Annex VI of the draft implementing regulation. The EDPS highlights the importance of these ‘embedded disclosure policies’, since they help operationalise the data protection principles of purpose limitation and data minimisation by limiting the disclosure of electronic attestations of attributes to the wallet-relying parties falling under the categories of relying parties identified by these policies.
27. The EDPS welcomes the new Annex III of Implementing Regulation (EU) 2024/2979, which mandates the implementation of ‘Clause 4.2.5 in [tbc ETSI TS 119 472-3 V0.0.12 (2026-1)]’<sup>44</sup>, which harmonises the implementation of the ‘embedded disclosure policies’.

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<sup>41</sup> See REQ-EAASP-4.2.2.3-09, REQ-EAASP-4.2.2.3-10 and REQ-EAASP-4.2.2.3-16 at page 13, as well as REQ-EAASP-6.1.2-01 at page 17 and REQ-EAASP-7.5.5-05 at page 21 of the standard.

<sup>42</sup> Annex II to the draft implementing regulation.

<sup>43</sup> As new Article 14a of Implementing Regulation (EU) 2024/2979.

<sup>44</sup> At the time of these formal comments the last version is: [ETSI TS 119 472-3 V1.1.1 \(2026-03\)](#)

28. The EDPS recommends amending the draft implementing regulation so as to make the use of ‘embedded disclosure policies’ mandatory for all cases where there is a legal requirement to limit the types of relying parties (for instance, when the attribute can only be accessed by certain public administrations and not by others, as established under national law). This would strengthen compliance with data protection principles.
29. Having regard to Implementing Regulation (EU) 2024/2979 and the formal comments already issued on the proposal for that implementing regulation<sup>45</sup>, the EDPS reiterates the following comments and recommendations.
30. The EDPS recommends that the draft implementing regulation amends Implementing Regulation (EU) 2024/2979 introducing a maximum storage period for transaction logs referred to in Article 9 of Implementing Regulation (EU) 2024/2979.
31. The EDPS considers that a functionality ensuring automated detection and blocking of excessive access requests would enhance the protection of privacy and personal data. Further work may also be warranted to develop harmonised specifications of data elements to be made accessible only for certain intended use(s) (use-case(s))<sup>46</sup>. The definition of the permissible attribute requests could not only address the legal certainty and interoperability issues but also enhance user’s control on their data and mitigate risks of ‘request fatigue’.

### **2.2.3. On the amendments to Implementing Regulation (EU) 2024/2982**

32. The EDPS notes that the draft implementing regulation<sup>47</sup> would replace Article 3 of the Implementing Regulation (EU) 2024/2982. The EDPS recommends deleting the wording “where applicable” in the proposed new Article 3(3), (4), (6) and (7) of Implementing Regulation (EU) 2024/2982, since the EDPS considers that the measures referred to in these articles should be applicable in all cases.
33. Having regard to Implementing Regulation (EU) 2024/2982 and the formal comments already issued on the proposal for this implementing regulation<sup>48</sup>, the EDPS reiterates the following comments and recommendations.
34. Implementing Regulation (EU) 2024/2982 provides that wallet providers must ensure that wallet units support protocols and interfaces that enable the communication of data erasure requests<sup>49</sup> pursuant to Article 17 GDPR to wallet relying parties in accordance with Article 6 of Implementing Regulation (EU) 2024/2982. This is an important and welcome specification. However, the EDPS recommends additionally integrating a functionality to record the result of the erasure request.
35. The EDPS also welcomes that, among the required functionalities, wallet providers must ensure the reporting by users of wallet relying parties to data protection authorities<sup>50</sup> in accordance with Article 7 of Implementing Regulation (EU) 2024/2982.

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<sup>45</sup> [EDPS Formal comments on the draft Commission Implementing Regulation \(EU\) laying down rules for the application of Regulation \(EU\) No 910/2014 of the European Parliament and of the Council, as regards the integrity and core functionalities of European Digital Identity Wallets](#), issued on 30 September 2024.

<sup>46</sup> This might be the case of health data, or other sensitive personal data, to be made accessible via the EUDIW.

<sup>47</sup> Article 4(2) of the draft implementing regulation.

<sup>48</sup> [EDPS Formal comments on the draft Commission Implementing Regulation \(EU\) laying down rules for the application of Regulation \(EU\) No 910/2014 of the European Parliament and of the Council as regards protocols and interfaces to be supported by the European Digital Identity Wallets](#), issued on 30 September 2024.

<sup>49</sup> Article 1(3) of Implementing Regulation (EU) 2024/2982.

<sup>50</sup> Article 1(4) of Implementing Regulation (EU) 2024/2982.

Wallet providers should ensure that wallet solutions provide mechanisms for the easy reporting by users of a relying party to the competent national data protection authority, where an allegedly unlawful or suspicious request for data is made. It should be possible in particular for the user to check if the relying party requests the user to provide any data other than the ones indicated pursuant to Article 5b(2)(c) of the basic act, thus in breach of Article 5b(3) of the basic act.

36. The EDPS considers that the wallet should log the actions related to the reporting. Therefore, the EDPS recommends adding these requirements in Article 7 of Implementing Regulation (EU) 2024/2982 or to the enacting terms of another relevant implementing regulation, e.g. Implementing Regulation (EU) 2024/2979.
37. Having regard to the possibility to submit reports and complaints in a machine-readable format<sup>51</sup>, the EDPS recommends that the Implementing Regulation (EU) 2024/2982 provides for the development of a standard form, to be defined in close cooperation with the European Data Protection Board. Such standard form should include complaints related to excessive data requests by a relying party (e.g., a relying party requesting an excessive amount of data in relation to the purposes pursued).
38. The EDPS also recommends that the Implementing Regulation (EU) 2024/2982 provides that wallet units support standardised protocols enabling users to receive from relying parties the information to which they are entitled as data subjects under Article 12, 13 and 14 GDPR when relying parties request access to personal identification data or attributes. In this regard, the EDPS recalls that such information would be included in the 'privacyPolicy' referred to in Annex V, Table 2, of the draft implementing regulation amending Regulation (EU) 2025/848.

Brussels, 17 April 2026

*(e-signed)*

Wojciech Rafał WIEWIÓROWSKI

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<sup>51</sup> Article 7(3) of Implementing Regulation (EU) 2024/2982.