Dear Mr. Servida,


As some of the key provisions of this Regulation will only be detailed by the implementing acts you are expected to draft in the coming months, the WP29 would like to be given the opportunity to comment on the possible data protection impact of these acts. That personal data is probably concerned by the implementing acts can be seen in the latest two published summaries of the 9th and 10th meeting of the EIDAS expert group on January 15th and February 11th. There are e.g. questions of dynamic or static authentication factors and of minimum data sets mentioned.

Therefore I would like to invite you to share the relevant drafts with the WP29, which would then analyse them with the help of its e-Government subgroup. Also a meeting with members of this subgroup would be appreciated.

This is meant ultimately to enable the WP29 to react and offer its advice on any data protection issues arising from these implementing acts prior to their adoption by the EU Commission.
For your information I have attached a letter from March 2013 from the WP29 to the former Vice-President of the European Commission Neelie Kroes. It refers to the draft of the regulation from June 7th 2012 (COM (2012)238final) and expresses a few remarks and concerns on that topic.

Yours sincerely,
On behalf of the Article 29 Working Party,

Isabelle Falque-Pierrotin
Chairwoman