

(English version)

**Priority question for written answer P-004565/25
to the Commission
Christine Anderson (ESN)
(17 November 2025)**

Subject: Digital Omnibus 1: Impact of GDPR ‘compatible use’ changes on eIDAS 2.0, digital identity wallets and biometric systems

The Commission has signalled that the forthcoming Digital Omnibus may introduce changes to concepts of the General Data Protection Regulation (GDPR) such as compatible use, purpose limitation and secondary processing. Since the GDPR forms the legal foundation for the European digital identity wallet, digital travel credentials (DTCs) and other identity and biometric systems, any modification of these concepts could materially affect the guarantees on which these systems were legislated.

1. Will the Commission explicitly confirm that any expansion of ‘compatible use’ under the omnibus will not enable personal, identity-linked or biometric data collected under the revised Electronic Identification and Trust Services Regulation (eIDAS 2.0) or for DTCs to be repurposed for analytics, AI training, or security or intelligence objectives?
2. How will the Commission ensure that identity or travel-related data cannot be further processed beyond the purposes that were originally authorised by sectoral legislation, even if the horizontal GDPR framework becomes more permissive?
3. Does the Commission commit to maintaining strict purpose limitation for all identity and authentication systems irrespective of any omnibus-related GDPR adjustments?

Submitted: 17.11.2025

**Answer given by Executive Vice-President Virkkunen on behalf of the European Commission
(23 December 2025)**

According to Regulation (EU) No 910/2014 ⁽¹⁾, where a relying party intends to rely upon European Digital Identity Wallets (EUDI Wallets) for the provision of public or private services by means of digital interaction, the relying party shall be registered in the Member State where it is established, it will declare the intended use of EUDI Wallets, including an indication of the data to be requested by the relying party from users, and it shall not request users to provide any data other than those indicated.

Furthermore, in order to protect the user against illegal information requests, the regulatory framework for the EUDI Wallets sets out which information can be requested from EUDI Wallet users.

Additionally, the technical infrastructure of the EUDI Wallets has been designed to ensure data minimisation as well as the unlinkability and unobservability of the various transactions carried out with the wallet.

The Commission proposed well-targeted amendments to the General Data Protection Regulation (GDPR) ⁽²⁾ ⁽³⁾. They do not touch on the fundamentals of the GDPR but aim to harmonise, clarify, and simplify the application of the GDPR and do not negatively impact individuals’ fundamental rights, including their right to data protection.

One of the amendments clarifies the compatibility of further processing of personal data for certain privileged purposes currently set out in Article 5(1)(b) GDPR, i.e. for scientific, historic research, statistics and archiving in the public interest. The envisaged clarification is not applicable to any other purpose pursued by the controllers.

The proposed amendments do not alter specific rules in other EU law, such as the rules of Regulation (EU) 910/2014 and in the Commission’s proposal on digital travel credentials ⁽⁴⁾.

⁽¹⁾ 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, p. 73 <https://eur-lex.europa.eu/legal-content/EN/AUTO/?uri=OJ:L:2014:257:TOC>).

⁽²⁾ Proposal for a regulation of the European Parliament and of the Council amending Regulations (EU) 2016/679, (EU) 2018/1724, (EU) 2018/1725, (EU) 2023/2854 and Directives 2002/58/EC, (EU) 2022/2555 and (EU) 2022/2557 as regards the simplification of the digital legislative framework, and repealing Regulations (EU) 2018/1807, (EU) 2019/1150, (EU) 2022/868, and Directive (EU) 2019/1024 (Digital Omnibus), COM(2025) 837 final.

⁽³⁾ 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 (General Data Protection Regulation), <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32016R0679>.

⁽⁴⁾ Proposal for a regulation of the European Parliament and of the Council establishing an application for the electronic submission of travel data (EU Digital Travel application) and amending Regulations (EU) 2016/399 and (EU) 2018/1726 of the European Parliament and of the Council and Council Regulation (EC) No 2252/2004, as regards the use of digital travel credentials, Strasbourg, 8.10.2024, COM(2024) 670 final.