

On the (Privacy) Harms of the European Digital Identity Framework



Christian Knabenhans and Shannon Veitch

CAW 2026

Joint work with Mathilde Raynal, Sylvain Chatel, Theresa Stadler, Wouter Lueks, and Carmela Troncoso

REGULATION

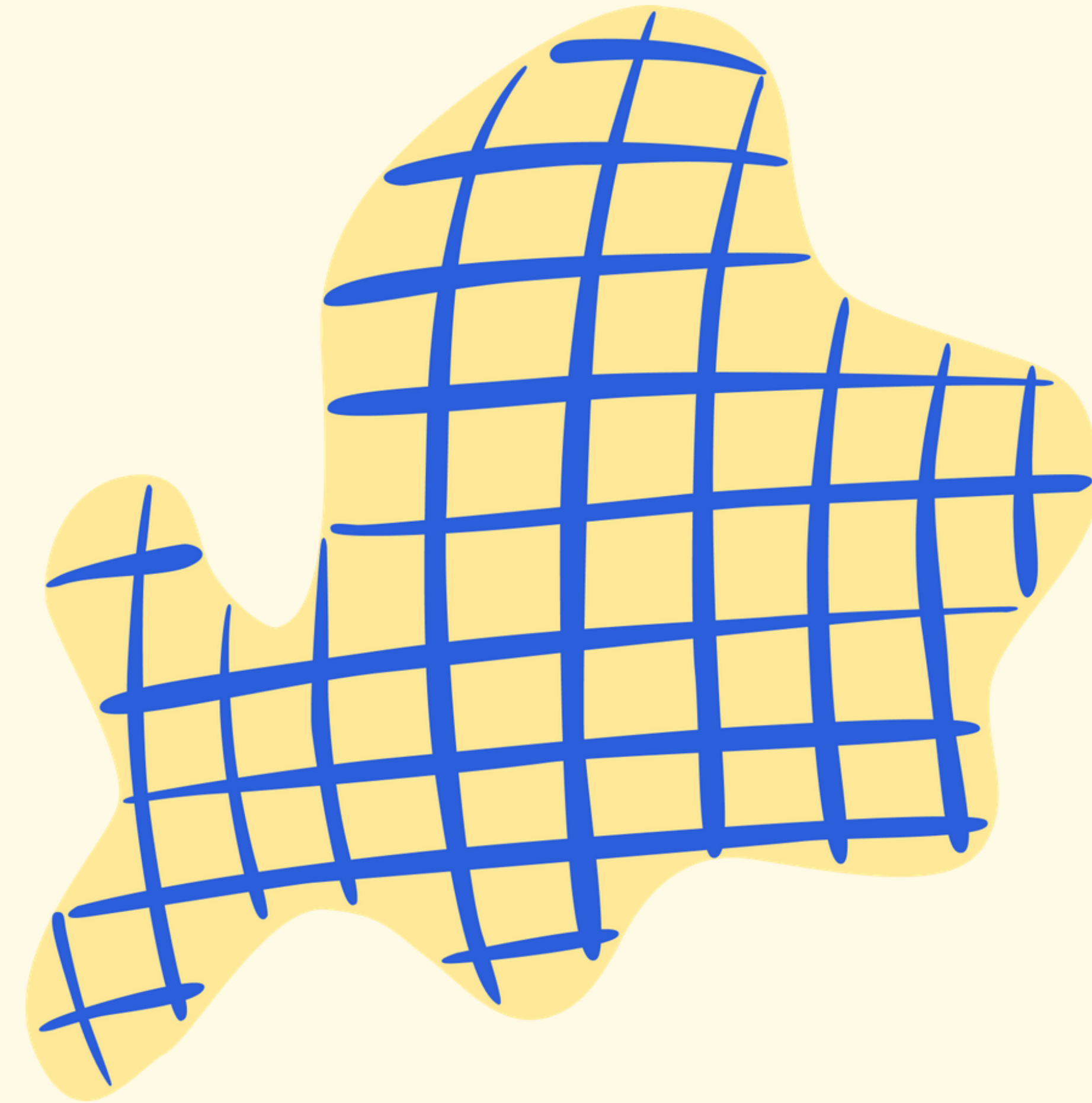
The EU Digital Identity Framework: a new era for Digital Identification

The European Digital Identity Regulation (EU) 2024/1183 was adopted on 20 May 2024.

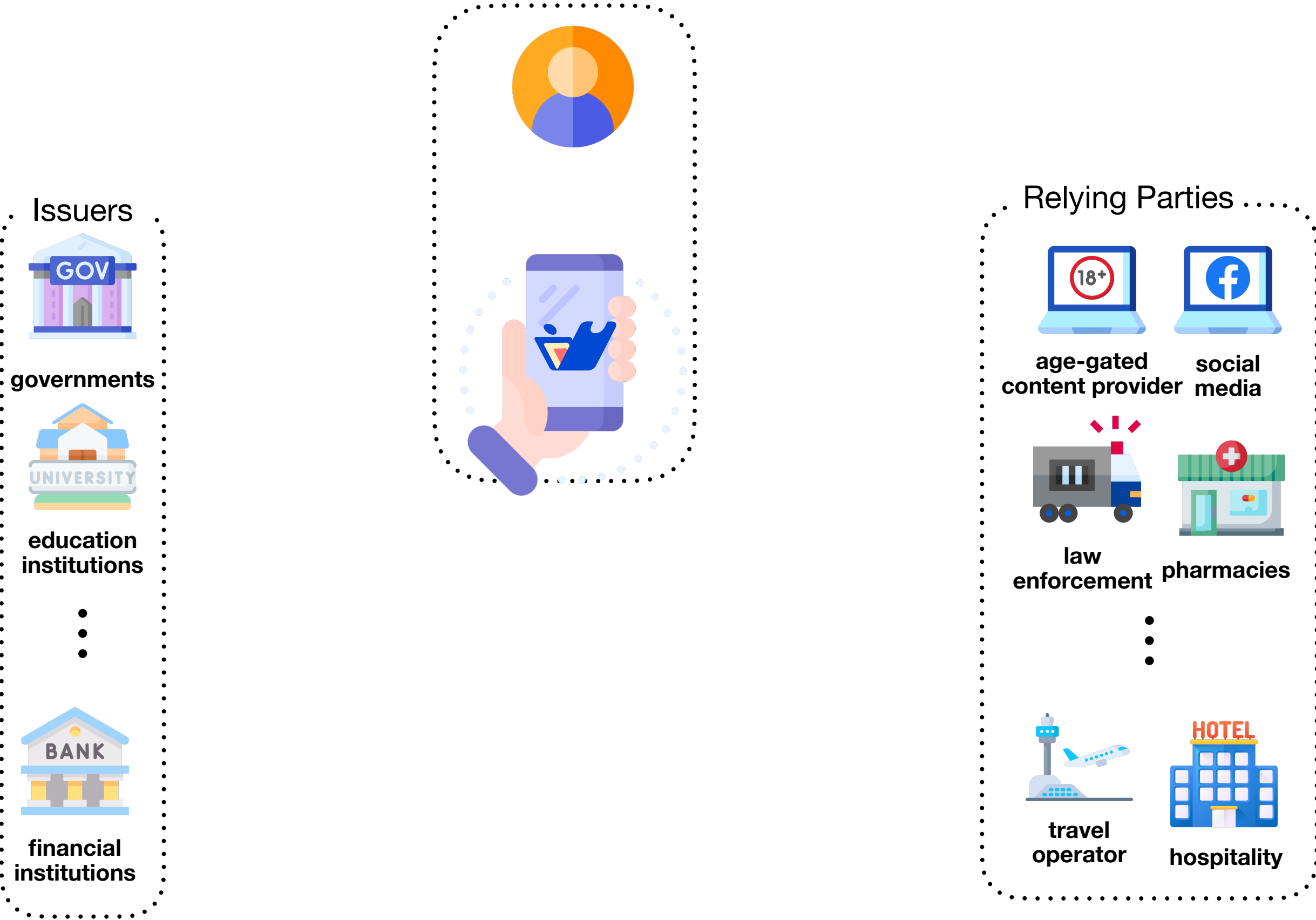
It seeks to enhance the way citizens and businesses securely identify and authenticate themselves online, strengthening trust in cross-border services by ensuring the availability of a unified, secure, and user-friendly digital identity solution across the EU.

[Learn more about the initiative >](#)

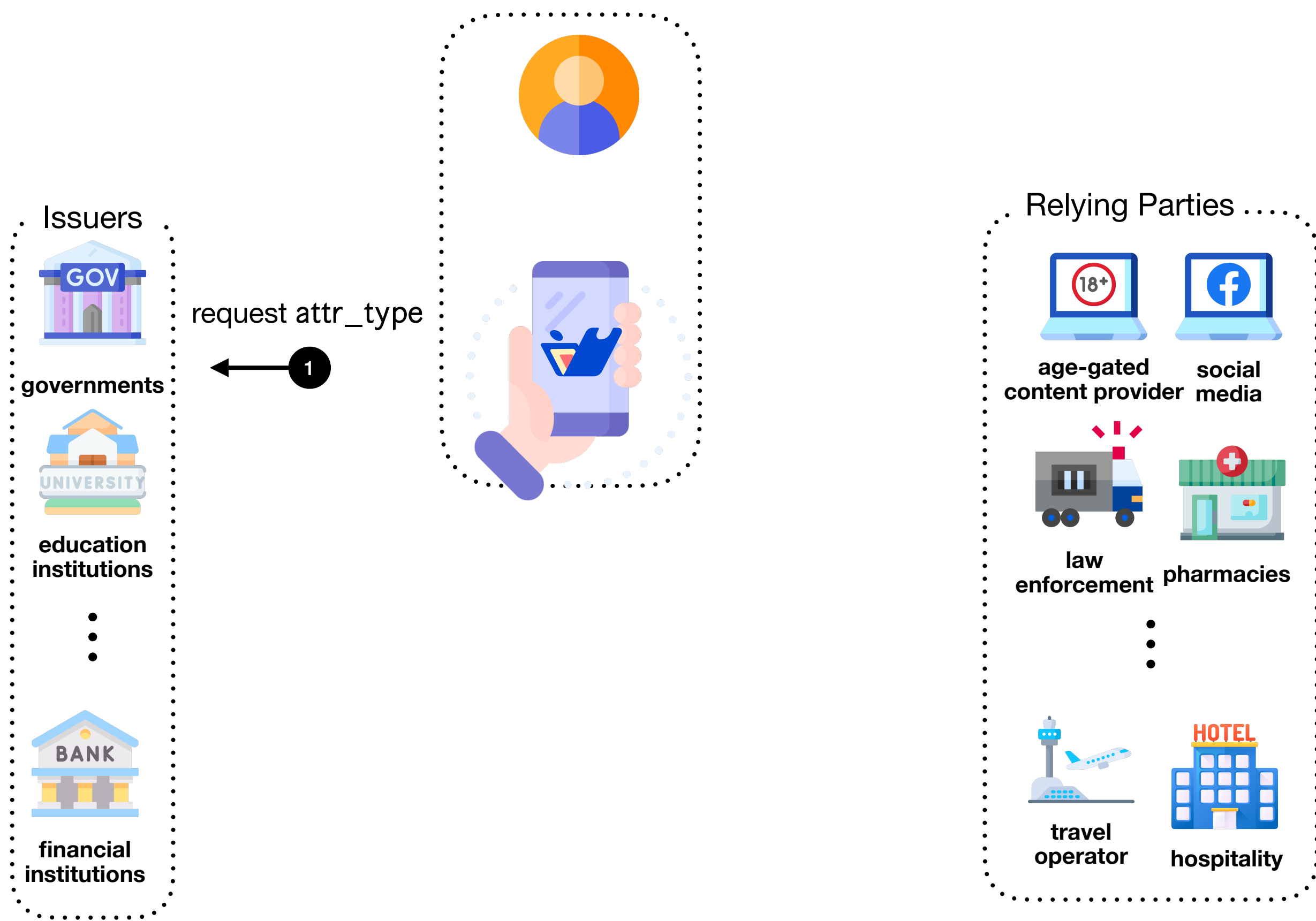
[Explore the regulation](#) 



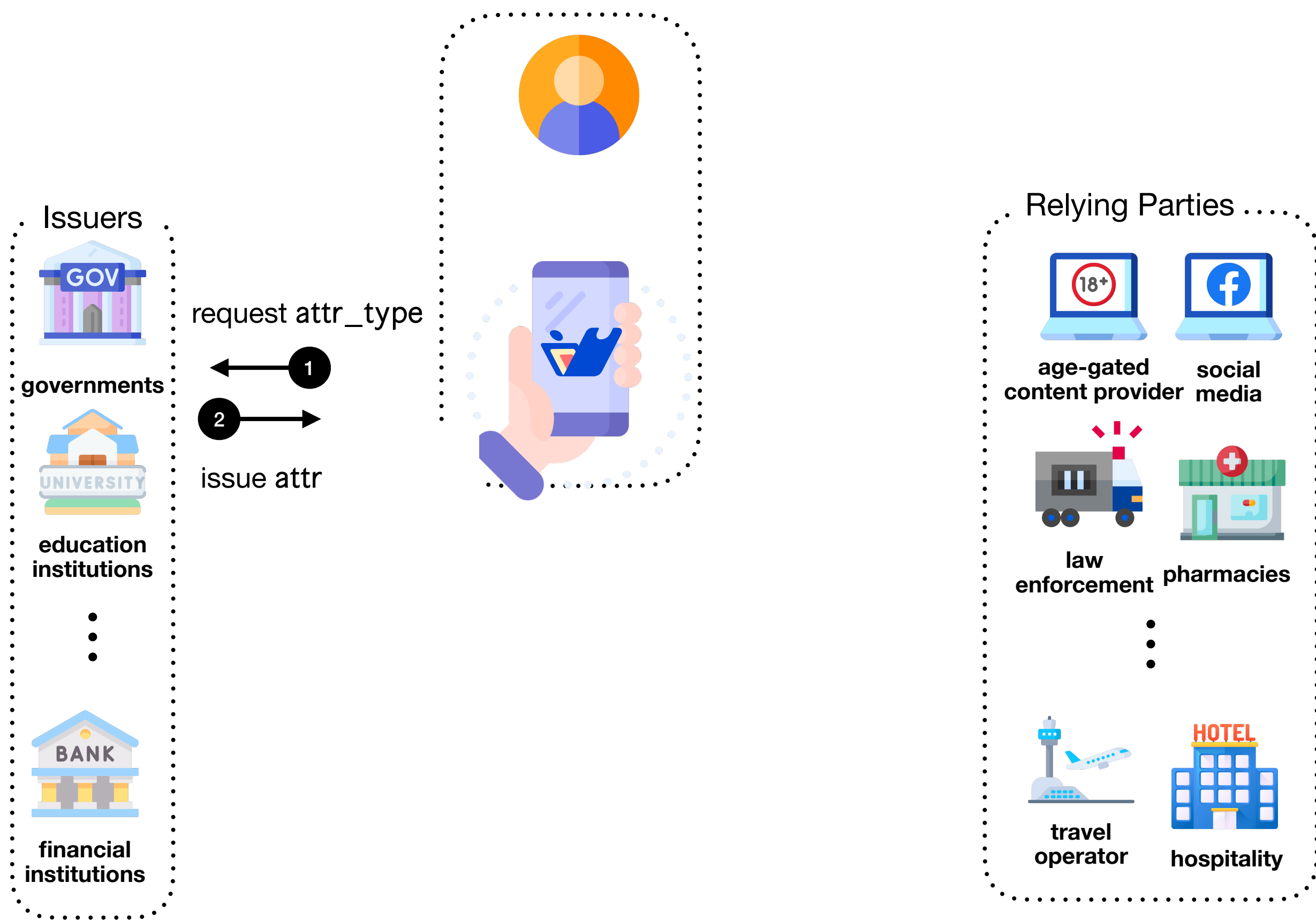
European Digital Identity Framework (EUDIF)



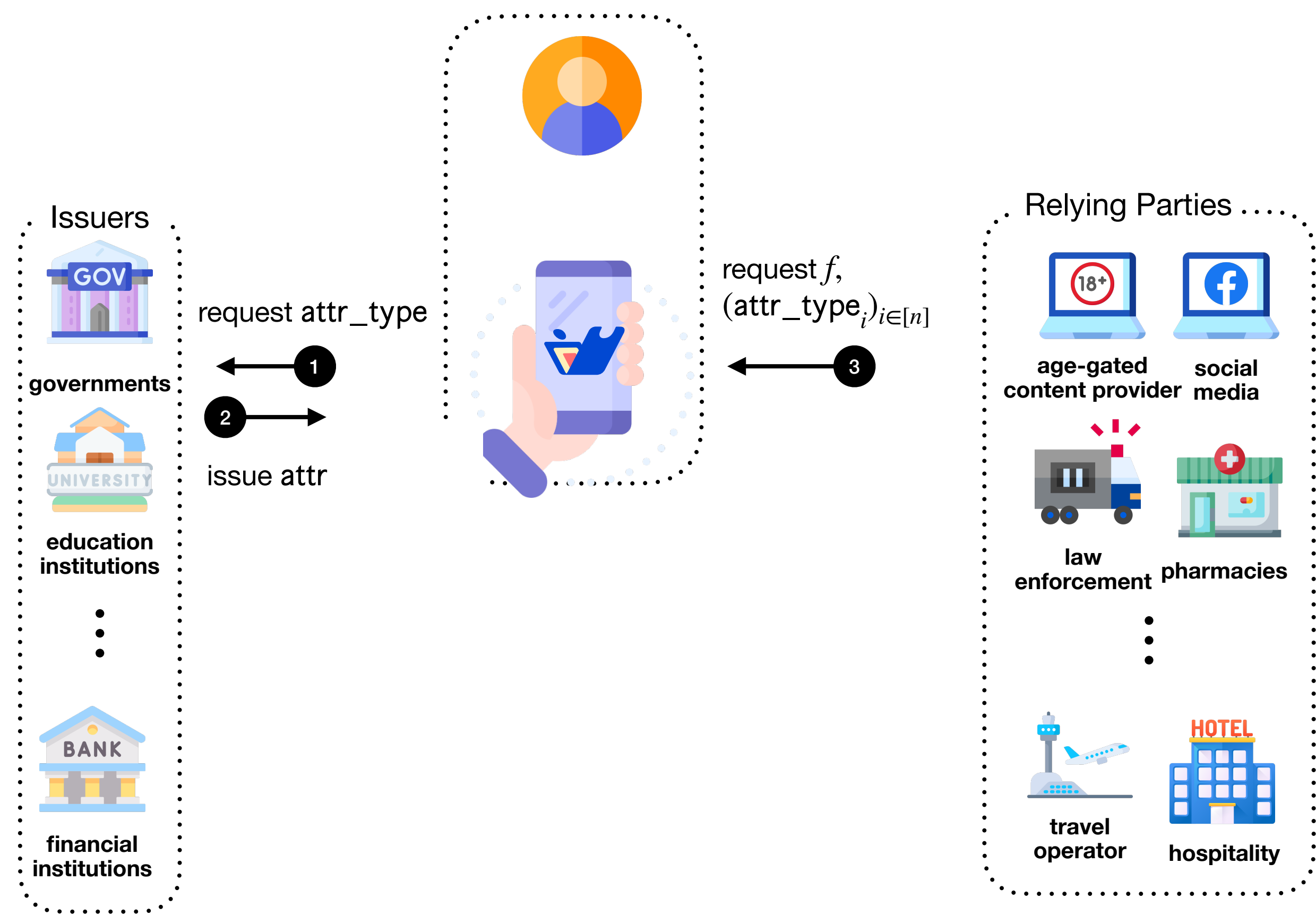
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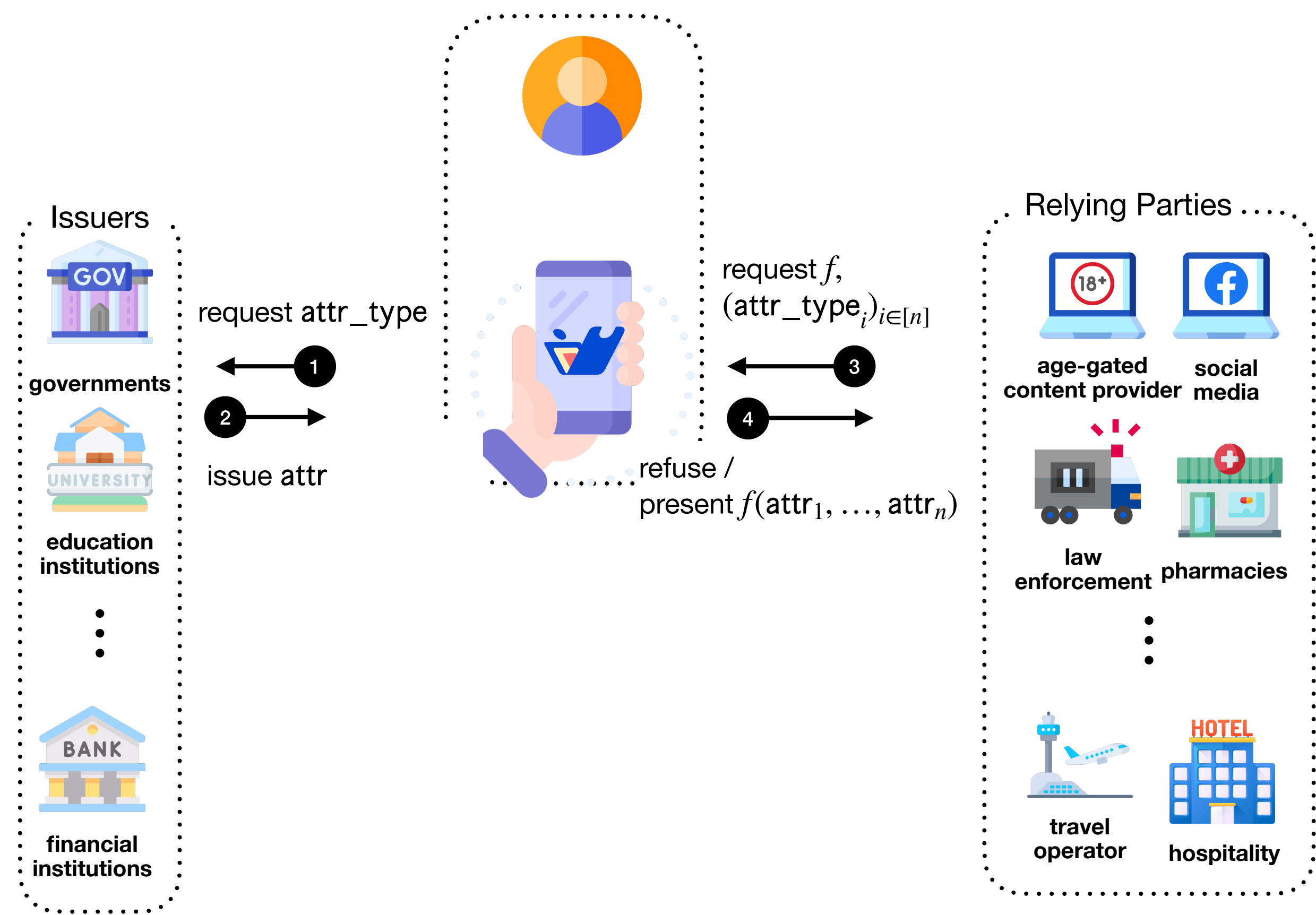
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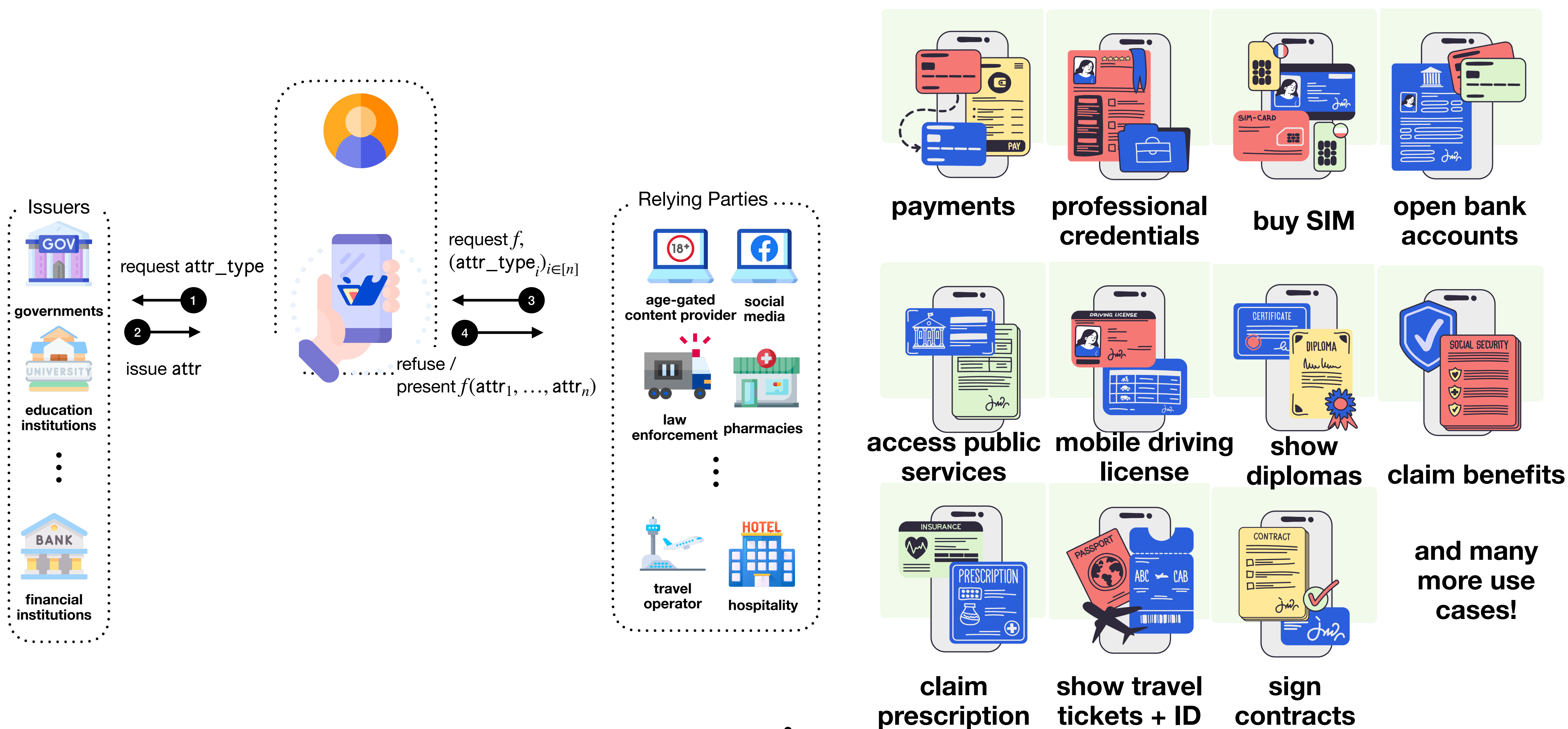
European Digital Identity Framework (EUDIF)



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European Digital Identity Framework (EUDIF)



Privacy and the EUDIF

Privacy and the EUDIF



Privacy Analysis eIDAS

European Digital Identity Wallets Implementing Acts

9. September 2024

SUMMARY

This document is an analysis of the five draft implementing acts for the eIDAS European Digital Identity (EUDI) Wallet¹ from a human rights and data protection perspective. We are building on our extensive work on this dossier over the past three years² and our most recent analysis of the ARF 1.4³, which also forms the basis of these implementing acts. We welcome that our suggestions to ensure pseudonyms can't be traced, the privacy cockpit have both been included in the analysis contained many recommendations based on the

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1 <https://ec.europa.eu/info/law/t%20Wallets&feedbackOpenDa>

2 <https://epicenter.works/en/doc>

3 <https://epicenter.works/en/con>

4 This implementing act would h certificates" are defined in the fields, this seems to be intenti

Cryptographers' Feedback on the EU Digital Identity's ARF

Carsten Baum Technical University of Denmark	Olivier Blazy École Polytechnique	Jan Camenisch Dfinity
Jaap-Henk Hoepman Karlstad University & Radboud University	Eysa Lee Brown University	Anja Lehmann Hasso-Plattner-Institute, University of Potsdam
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ayen London	Bart Preneel KU Leuven	abhi shelat Northeastern University
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June 2024

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eIDAS: European Digital Identity Wallet

Analysis and Amendments to the I

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Penn. University	Johannes Kepler University Linz	

 CENTER FOR DIGITAL RIGHTS	Jay Bybee	Bart Preneel	abhi shelat
	London	KU Leuven	Northeastern University
	Slamanig		Stefano Tessaro
	Bundeswehr München		University of Washington
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Partisia		EPFL	

June 2024



eIDAS: European Digital Identity Wallet

Analysis and Amendments to the Implementing Acts 2

31 January 2025 (v5)

This analysis and the proposed amendments are based on the second batch of implementing acts for the eIDAS regulation after their public consultation¹ in the updated version. They were sent out by the European Commission to negotiators on 22 January 2025 and will be discussed in the comitology meeting on 6 February 2025². This document only focuses on the implementing acts regarding the registration of wallet-relying parties (Article 5b) and the cross-border identity matching (Article 11a).

To better understand these proposals, we refer to our consultation response for the previous version of the implementing acts in the second batch³, the open letter about them signed by 15 digital rights and consumer protection organisations⁴ and our extensive work on this file over the past three years⁵.

We welcome the decision of the Commission to make wallet relying party registration certificates mandatory. These and other improvements follow our recommendations from the consultation and provide the clarity and assurances for a trusted eIDAS ecosystem. Furthermore, we welcome amendments to the **relying party registry**, but still see **important omissions** that undermine the purpose of the transparency register. Improvements are still needed to ensure the relying party registry can be a means for transparency and effective enforcement, which are both preconditions for trust. The main outstanding issue in the implementing act on relying party registration is the **lack of clarity in the distinction between KYC⁶ and non-KYC use cases**. It is vital for the enforcement of eIDAS that any legal obligation of a relying party to identify their users shall be registered as such, so as to allow the EUDI Wallet to adhere to the right to use pseudonyms as enshrined in the eIDAS regulation.

Lastly, we have to revisit the implementing act on identity matching. There is a **blatant overreach** by extending the scope of the controversial Article 11a about unique identifiers and also allowing the private sector access to centralised systems for identity matching. The Commission proposal **contradicts the eIDAS regulation and the agreement with the European Parliament**.

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Security & privacy at the heart of EU Digital Identity Wallets

You are in control

You will have complete control of what data you disclose from your wallet.

Your data will be stored locally on your wallet app. It stays in your control.

**Stored in
your
Wallet**

No tracking and profiling

What you share cannot be combined with other data, eliminating unwanted tracking, tracing and profiling.



EU Digital Identity
Wallet

European Digital Identity

2.8.0 latest ▼

European Digital Identity Wallet

Architecture and reference framework

Discussion topics Tec

G - Zero Knowledge Proof

Version 1.4, updated 30 March 2025

GitHub discussion

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Are PETs an appropriate answer to concerns about the harms of the EUDIF?

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G - Zero Knowledge Proof

Version 1.4, updated 30 March 2025

[GitHub discussion](#)

Modeling the EUDIF

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- Consolidated EU regulation of the base regulation No 910/2014 (eIDAS) amended by Regulation 2024/1183;
 - Implementing EU Reg. 2024/2977: personal identification data and electronic attestations of attributes;
 - Implementing EU Reg. 2024/2979: integrity and core functionalities of European Digital Identity Wallets;
 - Implementing EU Reg. 2024/2980: trust framework;
 - Implementing EU Reg. 2024/2981: certification of European Digital Identity Wallets;
 - Implementing EU Reg. 2024/2982: protocols and interfaces to be supported;
 - Implementing EU Reg. 2025/846: cross-border identity matching for natural persons;
 - Implementing EU Reg. 2025/847: reactions to security breaches of wallets;
 - Implementing EU Reg. 2025/848: registration of wallet-relying parties;
 - Implementing EU Reg. 2025/849: submitting information to the Commission for the list of certified wallets;
 - Implementing EU Reg. 2025/1566: verification of identity and attributes when issuing qualified certificates or qualified electronic attestations.
 - Implementing EU Reg. 2025/1567: management of remote qualified electronic signature/seal creation devices;
 - Implementing EU Reg. 2025/1568: procedural arrangements for peer reviews of eID schemes;
 - Implementing EU Reg. 2025/1569: electronic attestations of attributes (EAA/QEAA specifications);
 - Implementing EU Reg. 2025/1570: notifications of certified qualified signature/seal creation devices;
 - Implementing EU Reg. 2025/1572: initiation of qualified trust services (notification of intention);
 - Implementing EU Reg. 2025/1571: annual reports from supervisory bodies;
 - Supporting governance/technical documentation (EUDI Architecture and Reference Framework (ARF));
- + Adjacent EU laws (e.g., GDPR, accreditation, cybersecurity).

Modeling the EUDIF

Parties. Issuers $\mathcal{I}_{iid}$, Users $\mathcal{U}_{uid}$, Relying Parties $\mathcal{R}_{rid}$.

State. The functionality maintains the following global state:

- **Wallet** : $uid, attr_descr \mapsto (iid, attr)$ mapping a user ID and an attribute description to an issuer ID and an issued attribute.
- **Policies** : $uid, iid \mapsto \text{policy}$ mapping uid and iid to a disclosure policy for the attributes issued by $\mathcal{I}_{iid}$ to $\mathcal{U}_{uid}$.
- **RPIInfo** : $rid \mapsto rp_info$ mapping an RP ID rid to registered RP information rp_info (name, address, etc.) for $\mathcal{R}_{rid}$;
- **RPrege** : $rid \mapsto [(intended_use, f, (attr_descr_i)_{i \in [n]})]$ mapping rid to a list of registered intended uses, function over attributes, and attribute descriptions for a relying party $\mathcal{R}_{rid}$.

RP registration. On input (RegisterRPIInfo, rp_info) from $\mathcal{R}_{rid}$: set $RPIInfo[rid] := rp_info$.

RP usage registration. On input (RegisterRP, $intended_use, f, (attr_descr_i)_{i \in [n]}$) from $\mathcal{R}_{rid}$: require $RPIInfo[rid]$ to be set; append $(intended_use, f, (attr_descr_i)_{i \in [n]})$ to $RPrege[rid]$.

RP usage deregistration. On input (DeregisterRP, $intended_use, f, (attr_descr_i)_{i \in [n]}$) from $\mathcal{R}_{rid}$: require $RPIInfo[rid]$ to be set; remove $(intended_use, f, (attr_descr_i)_{i \in [n]})$ from $RPrege[rid]$. RPs can update their registration by deregistering and re-registering.

RP deregistration. On input DeregisterRPIInfo from $\mathcal{R}_{rid}$: require $RPIInfo[rid]$ to be set; set $RPIInfo[rid] := \perp$.

Issuance. On input (Issue, $iid, (attr_descr_i)_{i \in [m]}$) from a user $\mathcal{U}_{uid}$:

- (1) Get the output of the issuance oracle $o \leftarrow \mathcal{O}_{\text{Issue}}(iid, uid, (attr_descr_i)_{i \in [m]})$. If $o = \perp$, output $\perp$ to issuer and user. Otherwise, parse o as attributes $(attr)_{i \in [m]}$ and a disclosure policy $policy$.
- (2) Set $Policies[uid][iid] := policy$. For $i \in [m]$: Set $Wallet[uid][attr_descr_i] := (iid, attr_i)$. Send $((attr_descr_i)_{i \in [m]}, policy)$ to the user $\mathcal{U}_{uid}$ and issuer $\mathcal{I}_{iid}$.

Presentation. On input (Request, $rid, service$) from $\mathcal{U}_{uid}$: Require $RPIInfo[rid]$ to be set.

- (1) Send (Request, $service$) to $\mathcal{R}_{rid}$, and receive $(aux, f, (attr_descr_i)_{i \in [n]})$ from $\mathcal{R}_{rid}$.
- (2) If $aux = (rp_info, intended_use)$, store these values; Otherwise, if $aux = i_{intended_use}$, set $rp_info := RPIInfo[rid]$ and $intended_use := RPrege[rid][i_{intended_use}]$; Otherwise, abort. Send $(rp_info, intended_use, f, (attr_descr_i)_{i \in [n]})$ to $\mathcal{U}_{uid}$.
- (3) Receive $b_{\text{check}} \in \{0, 1\}$ from $\mathcal{U}_{uid}$ that indicates if the user optionally wants to check the RP's registration. If $b_{\text{check}} = 1$:
 Set $b_{\text{registration}} := 1$ if $(intended_use, f, (attr_descr_i)_{i \in [n]})$ is stored in $RPrege[rid]$, and $b_{\text{registered}} := 0$ otherwise.
 Send $b_{\text{registration}}$ to $\mathcal{U}_{uid}$, and receive $consent_1 \in \{0, 1\}$ from $\mathcal{U}_{uid}$. If $consent_1 = 0$, output $\perp$ to rid . Otherwise, continue.
- (4) For $i \in [n]$: retrieve $(iid_i, attr_i) := Wallet[uid][attr_descr_i]$ and $policy_i := Policies[uid][iid_i]$.
 Send $b_{\text{policy}} := \bigwedge_{j \in [n]} policy_j(rid, intended_use, f, (attr_descr_i)_{i \in [n]})$ to $\mathcal{U}_{uid}$ and receive $consent_2 \in \{0, 1\}$ from $\mathcal{U}_{uid}$. If $consent_2 = 0$, output $\perp$ to $\mathcal{R}_{rid}$. Otherwise, compute the output $v := f(attr_1, \dots, attr_n)$ and send v to $\mathcal{R}_{rid}$.

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Issuer

User

$\mathcal{F}_{EUDIF}$

RP

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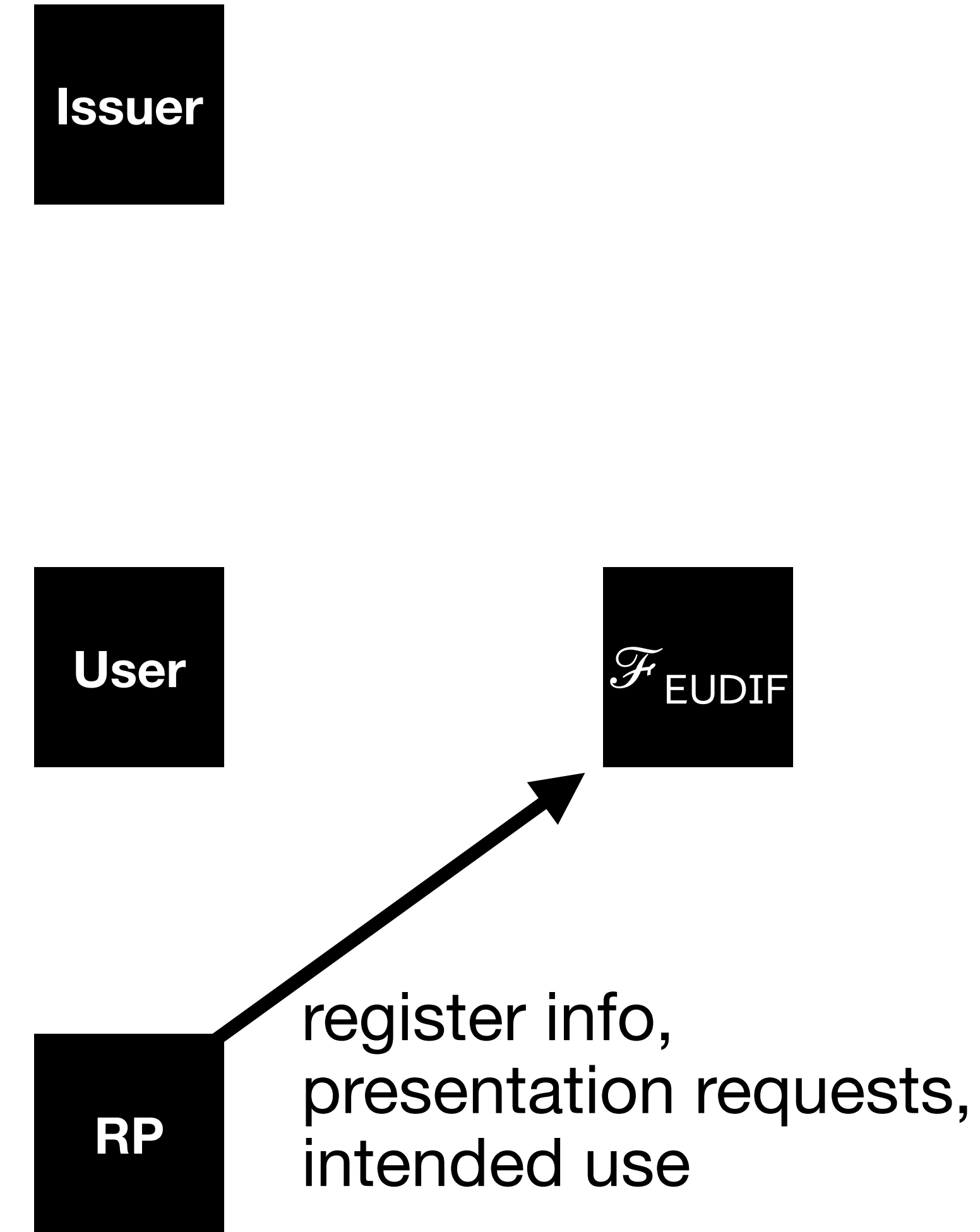
RP deregistration. On input DeregisterRPIInfo from $\mathcal{R}_{rid}$: require $RPIInfo[rid]$ to be set; set $RPIInfo[rid] := \perp$.

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- (1) Get the output of the issuance oracle $o \leftarrow \mathcal{O}_{issue}(iid, uid, (attr_descr_i)_{i \in [m]})$. If $o = \perp$, output $\perp$ to issuer and user. Otherwise, parse o as attributes $(attr)_{i \in [m]}$ and a disclosure policy $policy$.
- (2) Set $Policies[uid][iid] := policy$. For $i \in [m]$: Set $Wallet[uid][attr_descr_i] := (iid, attr_i)$. Send $((attr_descr_i)_{i \in [m]}, policy)$ to the user $\mathcal{U}_{uid}$ and issuer $\mathcal{I}_{iid}$.

Presentation. On input (Request, $rid, service$) from $\mathcal{U}_{uid}$: Require $RPIInfo[rid]$ to be set.

- (1) Send (Request, $service$) to $\mathcal{R}_{rid}$, and receive $(aux, f, (attr_descr_i)_{i \in [n]})$ from $\mathcal{R}_{rid}$.
- (2) If $aux = (rp_info, intended_use)$, store these values; Otherwise, if $aux = i_{intended_use}$, set $rp_info := RPIInfo[rid]$ and $intended_use := RPRReg[rid][i_{intended_use}]$; Otherwise, abort. Send $(rp_info, intended_use, f, (attr_descr_i)_{i \in [n]})$ to $\mathcal{U}_{uid}$.
- (3) Receive $b_{check} \in \{0, 1\}$ from $\mathcal{U}_{uid}$ that indicates if the user optionally wants to check the RP's registration. If $b_{check} = 1$:
Set $b_{registration} := 1$ if $(intended_use, f, (attr_descr_i)_{i \in [n]})$ is stored in $RPRReg[rid]$, and $b_{registered} := 0$ otherwise.
Send $b_{registration}$ to $\mathcal{U}_{uid}$, and receive $consent_1 \in \{0, 1\}$ from $\mathcal{U}_{uid}$. If $consent_1 = 0$, output $\perp$ to rid . Otherwise, continue.
- (4) For $i \in [n]$: retrieve $(iid_i, attr_i) := Wallet[uid][attr_descr_i]$ and $policy_i := Policies[uid][iid_i]$.
Send $b_{policy} := \bigwedge_{j \in [n]} policy_j(rid, intended_use, f, (attr_descr_i)_{i \in [n]})$ to $\mathcal{U}_{uid}$ and receive $consent_2 \in \{0, 1\}$ from $\mathcal{U}_{uid}$. If $consent_2 = 0$, output $\perp$ to $\mathcal{R}_{rid}$. Otherwise, compute the output $v := f(attr_1, \dots, attr_n)$ and send v to $\mathcal{R}_{rid}$.



Modeling the EUDIF

Parties. Issuers $\mathcal{I}_{iid}$, Users $\mathcal{U}_{uid}$, Relying Parties $\mathcal{R}_{rid}$.

State. The functionality maintains the following global state:

- **Wallet** : $uid, attr_descr \mapsto (iid, attr)$ mapping a user ID and an attribute description to an issuer ID and an issued attribute.
- **Policies** : $uid, iid \mapsto policy$ mapping uid and iid to a disclosure policy for the attributes issued by $\mathcal{I}_{iid}$ to $\mathcal{U}_{uid}$.
- **RPInfo** : $rid \mapsto rp_info$ mapping an RP ID rid to registered RP information rp_info (name, address, etc.) for $\mathcal{R}_{rid}$;
- **RPrep** : $rid \mapsto [(intended_use, f, (attr_descr_i)_{i \in [n]})]$ mapping rid to a list of registered intended uses, function over attributes, and attribute descriptions for a relying party $\mathcal{R}_{rid}$.

RP registration. On input (RegisterRPInfo, rp_info) from $\mathcal{R}_{rid}$: set $RPInfo[rid] := rp_info$.

RP usage registration. On input (RegisterRP, $intended_use, f, (attr_descr_i)_{i \in [n]}$) from $\mathcal{R}_{rid}$: require $RPInfo[rid]$ to be set; append $(intended_use, f, (attr_descr_i)_{i \in [n]})$ to $RPrep[rid]$.

RP usage deregistration. On input (DeregisterRP, $intended_use, f, (attr_descr_i)_{i \in [n]}$) from $\mathcal{R}_{rid}$: require $RPInfo[rid]$ to be set; remove $(intended_use, f, (attr_descr_i)_{i \in [n]})$ from $RPrep[rid]$. RPs can update their registration by deregistering and re-registering.

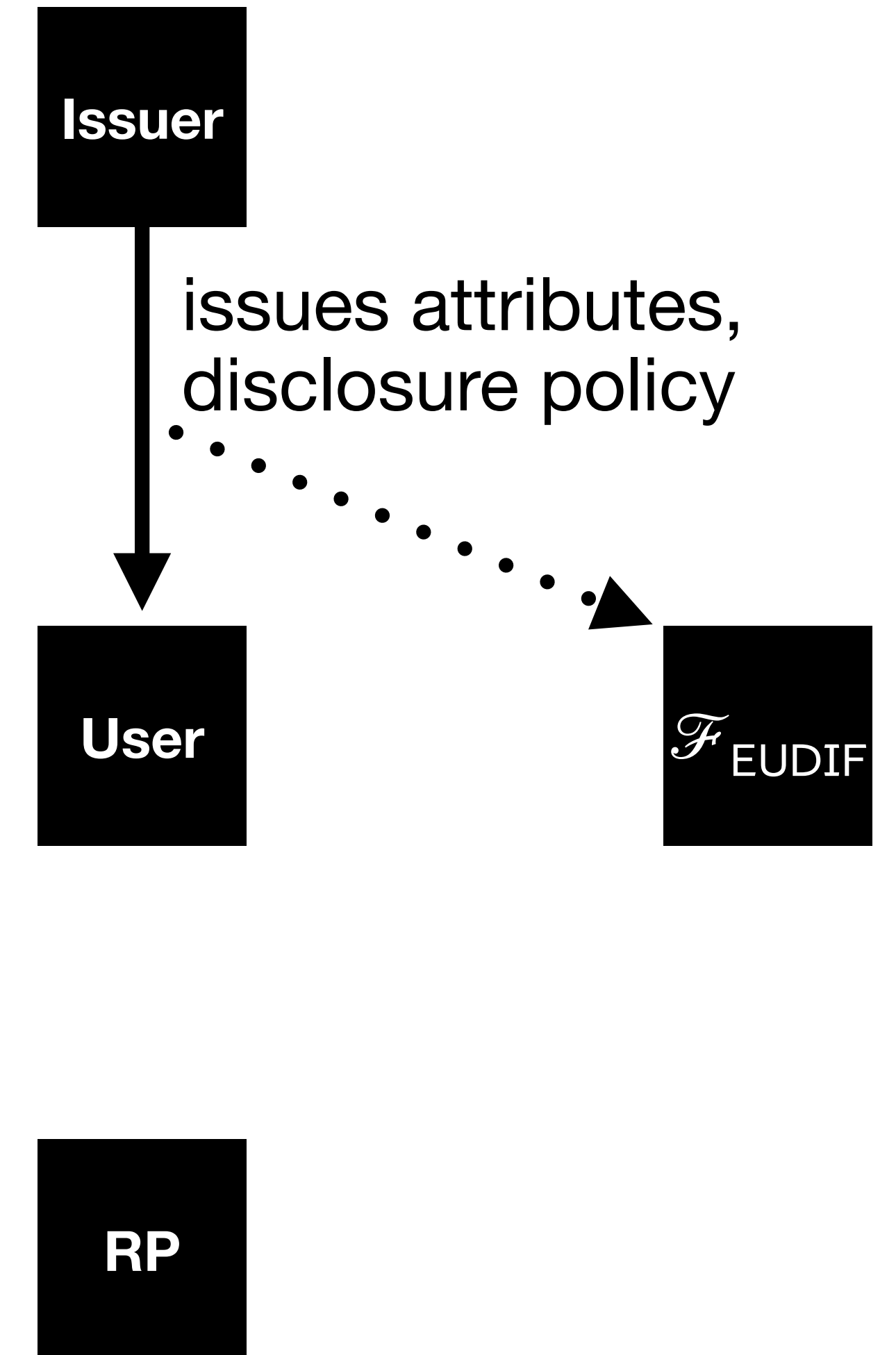
RP deregistration. On input DeregisterRPInfo from $\mathcal{R}_{rid}$: require $RPInfo[rid]$ to be set; set $RPInfo[rid] := \perp$.

Issuance. On input (Issue, $iid, (attr_descr_i)_{i \in [m]}$) from a user $\mathcal{U}_{uid}$:

- (1) Get the output of the issuance oracle $o \leftarrow \mathcal{O}_{issue}(iid, uid, (attr_descr_i)_{i \in [m]})$. If $o = \perp$, output $\perp$ to issuer and user. Otherwise, parse o as attributes $(attr)_{i \in [m]}$ and a disclosure policy $policy$.
- (2) Set $Policies[uid][iid] := policy$. For $i \in [m]$: Set $Wallet[uid][attr_descr_i] := (iid, attr_i)$. Send $((attr_descr_i)_{i \in [m]}, policy)$ to the user $\mathcal{U}_{uid}$ and issuer $\mathcal{I}_{iid}$.

Presentation. On input (Request, $rid, service$) from $\mathcal{U}_{uid}$: Require $RPInfo[rid]$ to be set.

- (1) Send (Request, $service$) to $\mathcal{R}_{rid}$, and receive $(aux, f, (attr_descr_i)_{i \in [n]})$ from $\mathcal{R}_{rid}$.
- (2) If $aux = (rp_info, intended_use)$, store these values; Otherwise, if $aux = i_{intended_use}$, set $rp_info := RPInfo[rid]$ and $intended_use := RPrep[rid][i_{intended_use}]$; Otherwise, abort. Send $(rp_info, intended_use, f, (attr_descr_i)_{i \in [n]})$ to $\mathcal{U}_{uid}$.
- (3) Receive $b_{check} \in \{0, 1\}$ from $\mathcal{U}_{uid}$ that indicates if the user optionally wants to check the RP's registration. If $b_{check} = 1$:
Set $b_{registration} := 1$ if $(intended_use, f, (attr_descr_i)_{i \in [n]})$ is stored in $RPrep[rid]$, and $b_{registered} := 0$ otherwise.
Send $b_{registration}$ to $\mathcal{U}_{uid}$, and receive $consent_1 \in \{0, 1\}$ from $\mathcal{U}_{uid}$. If $consent_1 = 0$, output $\perp$ to rid . Otherwise, continue.
- (4) For $i \in [n]$: retrieve $(iid_i, attr_i) := Wallet[uid][attr_descr_i]$ and $policy_i := Policies[uid][iid_i]$.
Send $b_{policy} := \bigwedge_{j \in [n]} policy_j(rid, intended_use, f, (attr_descr_i)_{i \in [n]})$ to $\mathcal{U}_{uid}$ and receive $consent_2 \in \{0, 1\}$ from $\mathcal{U}_{uid}$. If $consent_2 = 0$, output $\perp$ to $\mathcal{R}_{rid}$. Otherwise, compute the output $v := f(attr_1, \dots, attr_n)$ and send v to $\mathcal{R}_{rid}$.



Modeling the EUDIF

Parties. Issuers $\mathcal{I}_{iid}$, Users $\mathcal{U}_{uid}$, Relying Parties $\mathcal{R}_{rid}$.

State. The functionality maintains the following global state:

- **Wallet** : $uid, attr_descr \mapsto (iid, attr)$ mapping a user ID and an attribute description to an issuer ID and an issued attribute.
- **Policies** : $uid, iid \mapsto policy$ mapping uid and iid to a disclosure policy for the attributes issued by $\mathcal{I}_{iid}$ to $\mathcal{U}_{uid}$.
- **RPInfo** : $rid \mapsto rp_info$ mapping an RP ID rid to registered RP information rp_info (name, address, etc.) for $\mathcal{R}_{rid}$;
- **RPrep** : $rid \mapsto [(intended_use, f, (attr_descr_i)_{i \in [n]})]$ mapping rid to a list of registered intended uses, function over attributes, and attribute descriptions for a relying party $\mathcal{R}_{rid}$.

RP registration. On input (RegisterRPInfo, rp_info) from $\mathcal{R}_{rid}$: set $RPInfo[rid] := rp_info$.

RP usage registration. On input (RegisterRP, $intended_use, f, (attr_descr_i)_{i \in [n]}$) from $\mathcal{R}_{rid}$: require $RPInfo[rid]$ to be set; append $(intended_use, f, (attr_descr_i)_{i \in [n]})$ to $RPrep[rid]$.

RP usage deregistration. On input (DeregisterRP, $intended_use, f, (attr_descr_i)_{i \in [n]}$) from $\mathcal{R}_{rid}$: require $RPInfo[rid]$ to be set; remove $(intended_use, f, (attr_descr_i)_{i \in [n]})$ from $RPrep[rid]$. RPs can update their registration by deregistering and re-registering.

RP deregistration. On input DeregisterRPInfo from $\mathcal{R}_{rid}$: require $RPInfo[rid]$ to be set; set $RPInfo[rid] := \perp$.

Issuance. On input (Issue, $iid, (attr_descr_i)_{i \in [m]}$) from a user $\mathcal{U}_{uid}$:

- (1) Get the output of the issuance oracle $o \leftarrow \mathcal{O}_{issue}(iid, uid, (attr_descr_i)_{i \in [m]})$. If $o = \perp$, output $\perp$ to issuer and user. Otherwise, parse o as attributes $(attr)_{i \in [m]}$ and a disclosure policy $policy$.
- (2) Set $Policies[uid][iid] := policy$. For $i \in [m]$: Set $Wallet[uid][attr_descr_i] := (iid, attr_i)$. Send $((attr_descr_i)_{i \in [m]}, policy)$ to the user $\mathcal{U}_{uid}$ and issuer $\mathcal{I}_{iid}$.

Presentation. On input (Request, $rid, service$) from $\mathcal{U}_{uid}$: Require $RPInfo[rid]$ to be set.

- (1) Send (Request, $service$) to $\mathcal{R}_{rid}$, and receive $(aux, f, (attr_descr_i)_{i \in [n]})$ from $\mathcal{R}_{rid}$.
- (2) If $aux = (rp_info, intended_use)$, store these values; Otherwise, if $aux = i_{intended_use}$, set $rp_info := RPInfo[rid]$ and $intended_use := RPrep[rid][i_{intended_use}]$; Otherwise, abort. Send $(rp_info, intended_use, f, (attr_descr_i)_{i \in [n]})$ to $\mathcal{U}_{uid}$.
- (3) Receive $b_{check} \in \{0, 1\}$ from $\mathcal{U}_{uid}$ that indicates if the user optionally wants to check the RP's registration. If $b_{check} = 1$:
Set $b_{registration} := 1$ if $(intended_use, f, (attr_descr_i)_{i \in [n]})$ is stored in $RPrep[rid]$, and $b_{registered} := 0$ otherwise.
Send $b_{registration}$ to $\mathcal{U}_{uid}$, and receive $consent_1 \in \{0, 1\}$ from $\mathcal{U}_{uid}$. If $consent_1 = 0$, output $\perp$ to rid . Otherwise, continue.
- (4) For $i \in [n]$: retrieve $(iid_i, attr_i) := Wallet[uid][attr_descr_i]$ and $policy_i := Policies[uid][iid_i]$.
Send $b_{policy} := \bigwedge_{j \in [n]} policy_j(rid, intended_use, f, (attr_descr_i)_{i \in [n]})$ to $\mathcal{U}_{uid}$ and receive $consent_2 \in \{0, 1\}$ from $\mathcal{U}_{uid}$. If $consent_2 = 0$, output $\perp$ to $\mathcal{R}_{rid}$. Otherwise, compute the output $v := f(attr_1, \dots, attr_n)$ and send v to $\mathcal{R}_{rid}$.

Issuer

User

$\mathcal{F}_{EUDIF}$

RP

requests presentation of attributes,
shows info, intended use

Modeling the EUDIF

Parties. Issuers $\mathcal{I}_{iid}$, Users $\mathcal{U}_{uid}$, Relying Parties $\mathcal{R}_{rid}$.

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- **Policies** : $uid, iid \mapsto policy$ mapping uid and iid to a disclosure policy for the attributes issued by $\mathcal{I}_{iid}$ to $\mathcal{U}_{uid}$.
- **RPInfo** : $rid \mapsto rp_info$ mapping an RP ID rid to registered RP information rp_info (name, address, etc.) for $\mathcal{R}_{rid}$;
- **RPRReg** : $rid \mapsto [(intended_use, f, (attr_descr_i)_{i \in [n]})]$ mapping rid to a list of registered intended uses, function over attributes, and attribute descriptions for a relying party $\mathcal{R}_{rid}$.

RP registration. On input (RegisterRPInfo, rp_info) from $\mathcal{R}_{rid}$: set $RPInfo[rid] := rp_info$.

RP usage registration. On input (RegisterRP, $intended_use, f, (attr_descr_i)_{i \in [n]}$) from $\mathcal{R}_{rid}$: require $RPInfo[rid]$ to be set; append $(intended_use, f, (attr_descr_i)_{i \in [n]})$ to $RPRReg[rid]$.

RP usage deregistration. On input (DeregisterRP, $intended_use, f, (attr_descr_i)_{i \in [n]}$) from $\mathcal{R}_{rid}$: require $RPInfo[rid]$ to be set; remove $(intended_use, f, (attr_descr_i)_{i \in [n]})$ from $RPRReg[rid]$. RPs can update their registration by deregistering and re-registering.

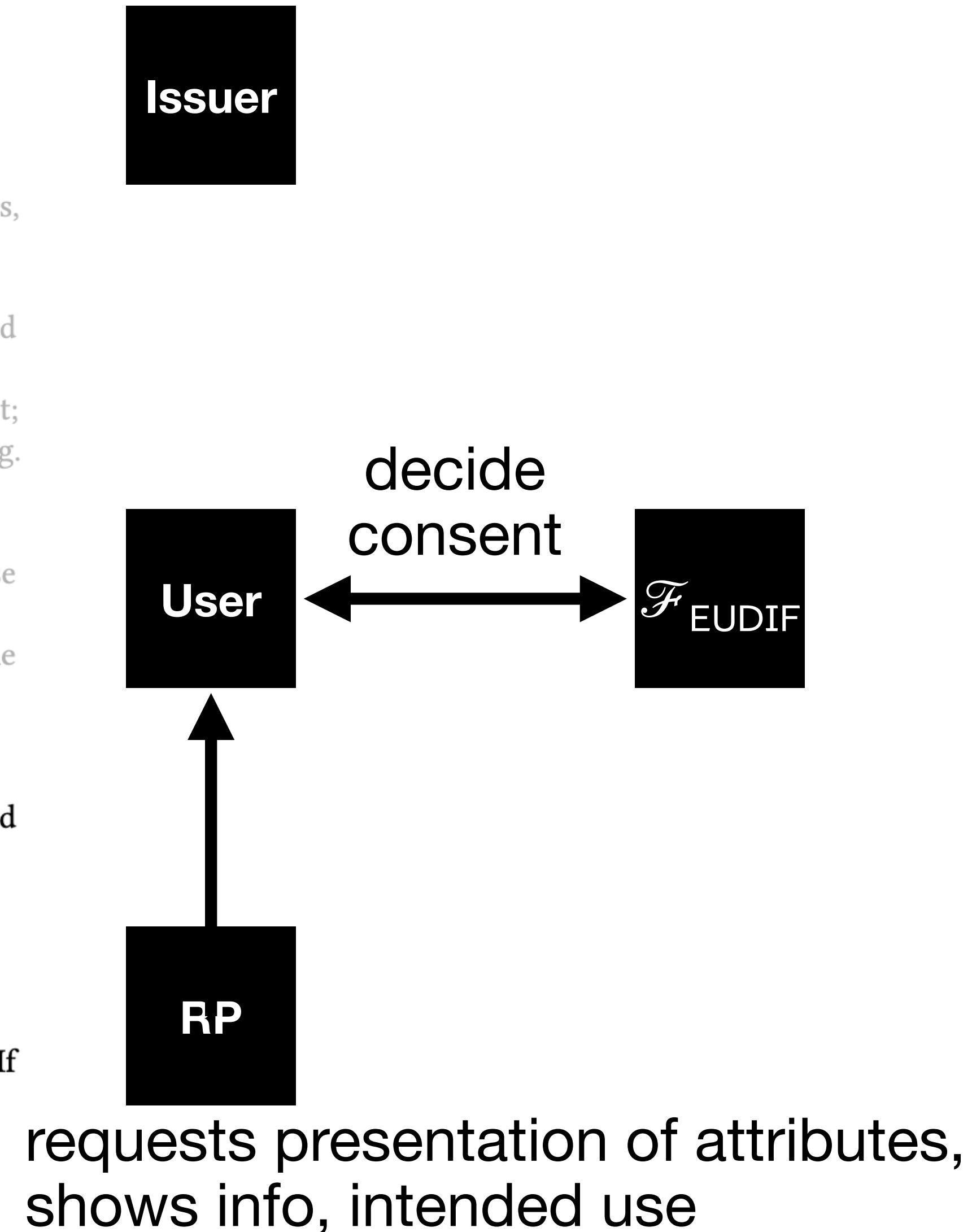
RP deregistration. On input DeregisterRPInfo from $\mathcal{R}_{rid}$: require $RPInfo[rid]$ to be set; set $RPInfo[rid] := \perp$.

Issuance. On input (Issue, $iid, (attr_descr_i)_{i \in [m]}$) from a user $\mathcal{U}_{uid}$:

- (1) Get the output of the issuance oracle $o \leftarrow \mathcal{O}_{issue}(iid, uid, (attr_descr_i)_{i \in [m]})$. If $o = \perp$, output $\perp$ to issuer and user. Otherwise, parse o as attributes $(attr)_{i \in [m]}$ and a disclosure policy $policy$.
- (2) Set $Policies[uid][iid] := policy$. For $i \in [m]$: Set $Wallet[uid][attr_descr_i] := (iid, attr_i)$. Send $((attr_descr_i)_{i \in [m]}, policy)$ to the user $\mathcal{U}_{uid}$ and issuer $\mathcal{I}_{iid}$.

Presentation. On input (Request, $rid, service$) from $\mathcal{U}_{uid}$: Require $RPInfo[rid]$ to be set.

- (1) Send (Request, $service$) to $\mathcal{R}_{rid}$, and receive $(aux, f, (attr_descr_i)_{i \in [n]})$ from $\mathcal{R}_{rid}$.
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Modeling the EUDIF

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- **Wallet** : $uid, attr_descr \mapsto (iid, attr)$ mapping a user ID and an attribute description to an issuer ID and an issued attribute.
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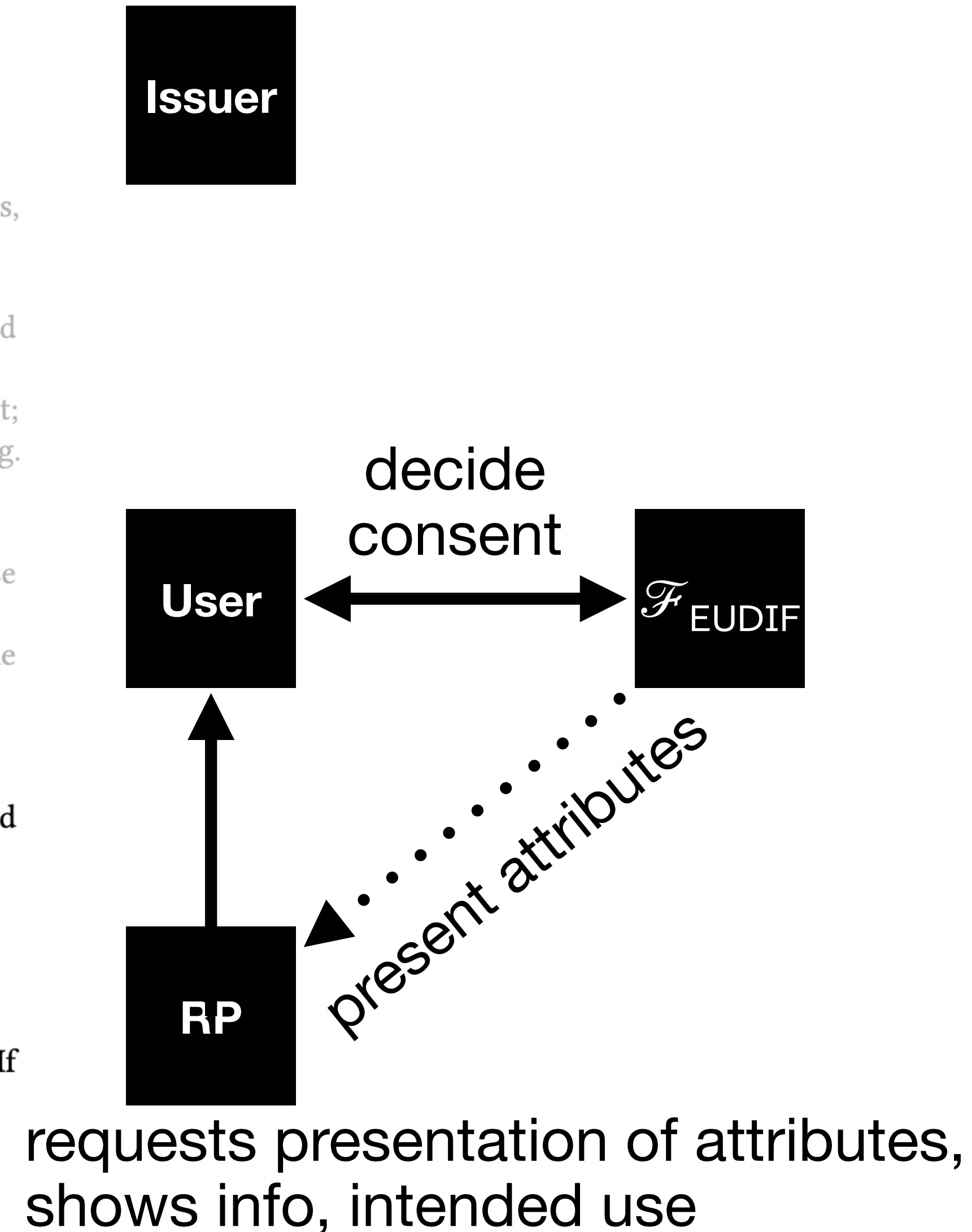
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Issuance. On input (Issue, $iid, (attr_descr_i)_{i \in [m]}$) from a user $\mathcal{U}_{uid}$:

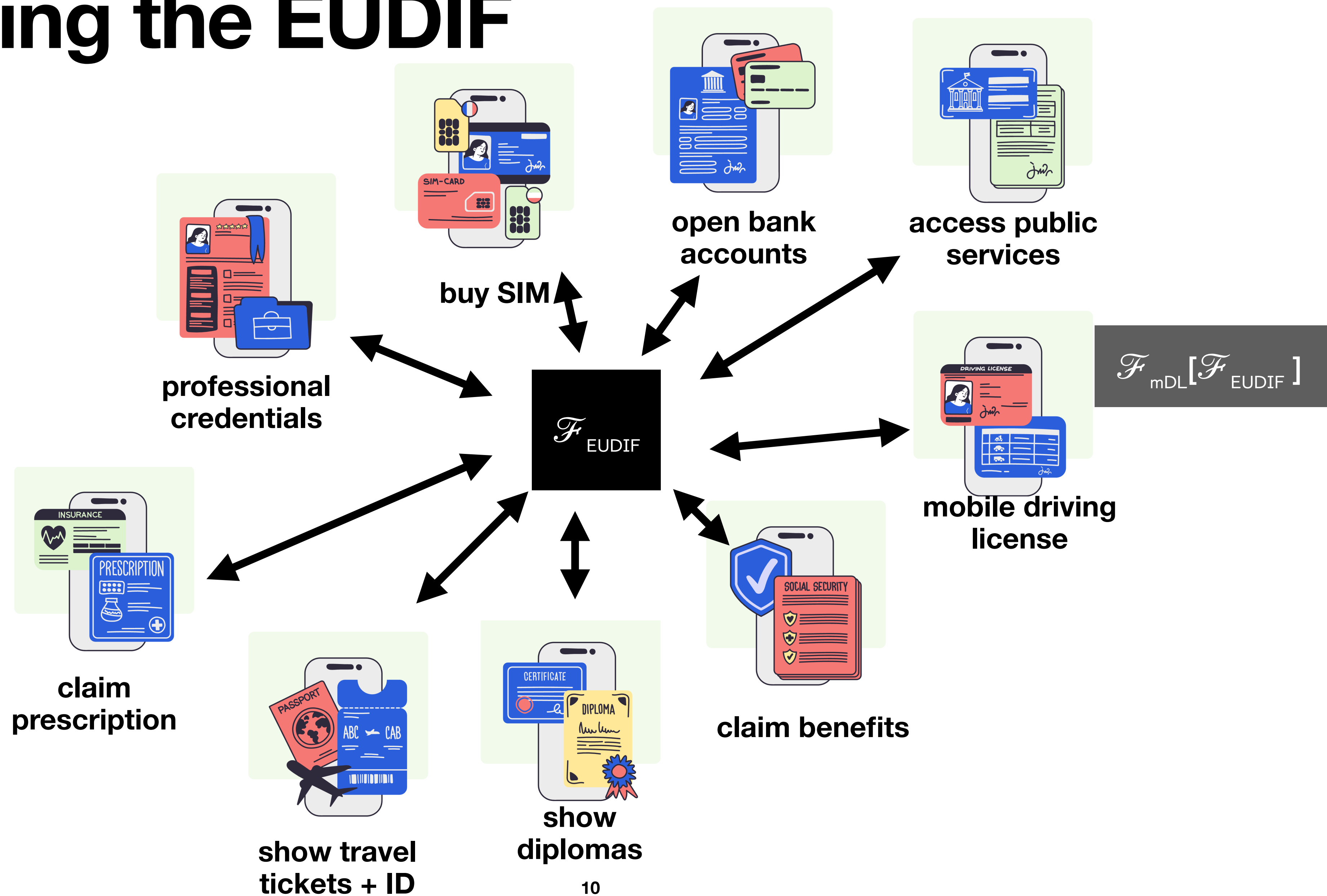
- (1) Get the output of the issuance oracle $o \leftarrow \mathcal{O}_{issue}(iid, uid, (attr_descr_i)_{i \in [m]})$. If $o = \perp$, output $\perp$ to issuer and user. Otherwise, parse o as attributes $(attr)_{i \in [m]}$ and a disclosure policy $policy$.
- (2) Set $Policies[uid][iid] := policy$. For $i \in [m]$: Set $Wallet[uid][attr_descr_i] := (iid, attr_i)$. Send $((attr_descr_i)_{i \in [m]}, policy)$ to the user $\mathcal{U}_{uid}$ and issuer $\mathcal{I}_{iid}$.

Presentation. On input (Request, $rid, service$) from $\mathcal{U}_{uid}$: Require $RPInfo[rid]$ to be set.

- (1) Send (Request, $service$) to $\mathcal{R}_{rid}$, and receive $(aux, f, (attr_descr_i)_{i \in [n]})$ from $\mathcal{R}_{rid}$.
- (2) If $aux = (rp_info, intended_use)$, store these values; Otherwise, if $aux = i_{intended_use}$, set $rp_info := RPInfo[rid]$ and $intended_use := RPrep[rid][i_{intended_use}]$; Otherwise, abort. Send $(rp_info, intended_use, f, (attr_descr_i)_{i \in [n]})$ to $\mathcal{U}_{uid}$.
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Send $b_{policy} := \bigwedge_{j \in [n]} policy_j(rid, intended_use, f, (attr_descr_i)_{i \in [n]})$ to $\mathcal{U}_{uid}$ and receive $consent_2 \in \{0, 1\}$ from $\mathcal{U}_{uid}$. If $consent_2 = 0$, output $\perp$ to $\mathcal{R}_{rid}$. Otherwise, compute the output $v := f(attr_1, \dots, attr_n)$ and send v to $\mathcal{R}_{rid}$.



Modeling the EUDIF



**What are the harms
of the EUDIF?**

Understanding Pathways to Harm: Age Verification

Understanding Pathways to Harm: Age Verification



Age-restricted online service
requests verification that a user
is over 18.

Understanding Pathways to Harm: Age Verification



Age-restricted online service requests verification that a user is over 18.



User's wallet uses credentials issued by a trusted authority to generate proof of age requirement.

Understanding Pathways to Harm: Age Verification



Age-restricted online service requests verification that a user is over 18.

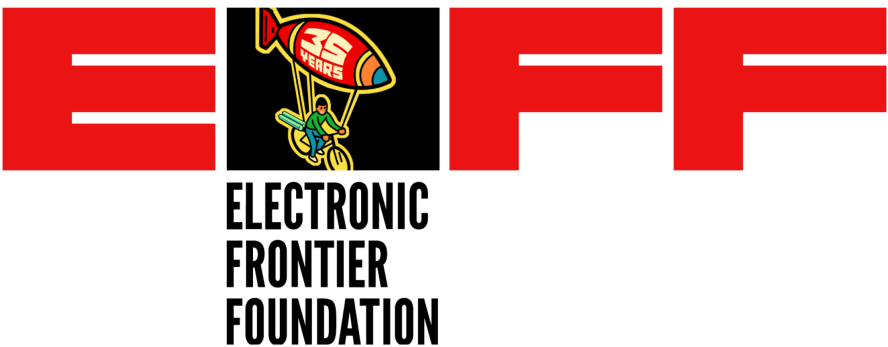


User's wallet uses credentials issued by a trusted authority to generate proof of age requirement.



Proof is shared with the age-restricted service; user can then access the content.

Understanding Pathways to Harm: Age Verification

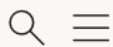


DEEPLINKS BLOG BY JASON KELLEY, ADAM SCHWARTZ | MARCH 10, 2023

Age Verification Mandates Would Undermine Anonymity Online

Age verification systems are surveillance systems. Mandatory age verification, and with it, mandatory identity verification, is the wrong approach to protecting young people online. It would force websites to require visitors to prove their age by submitting information such as government-issued identification. This scheme would lead us further towards an...

KGI Knight-Georgetown
Institute



REPORT / JANUARY 29, 2026

Age Assurance Online: A Technical Assessment of Current Systems and their Limitations

Governments around the world are adopting online age assurance requirements of different kinds, reshaping how digital services are accessed by adults and youth. KGI's latest report provides a technical assessment of how age assurance systems work in practice and examines their accuracy, circumvention resistance, availability, and privacy implications.

EN English

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IS Quarterly > Winners & Losers

Online Age-Gating Is the Wrong Answer

Mar 16, 2026 | JULIA POWLES and KATE SIM

With social-media minimum-age restrictions – or “bans” – gaining traction globally, it is worth considering whether this popular new policy intervention is as effective as its proponents claim. The evidence suggests not, and even raises concerns that age-gating could do more harm than good.



Open Letter of Digital Rights and Consumer Organisations Concerning eIDAS Implementing Acts

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THE ABC OF ABC: AN ANALYSIS OF ATTRIBUTE-BASED CREDENTIALS IN THE LIGHT OF DATA PROTECTION, PRIVACY AND IDENTITY

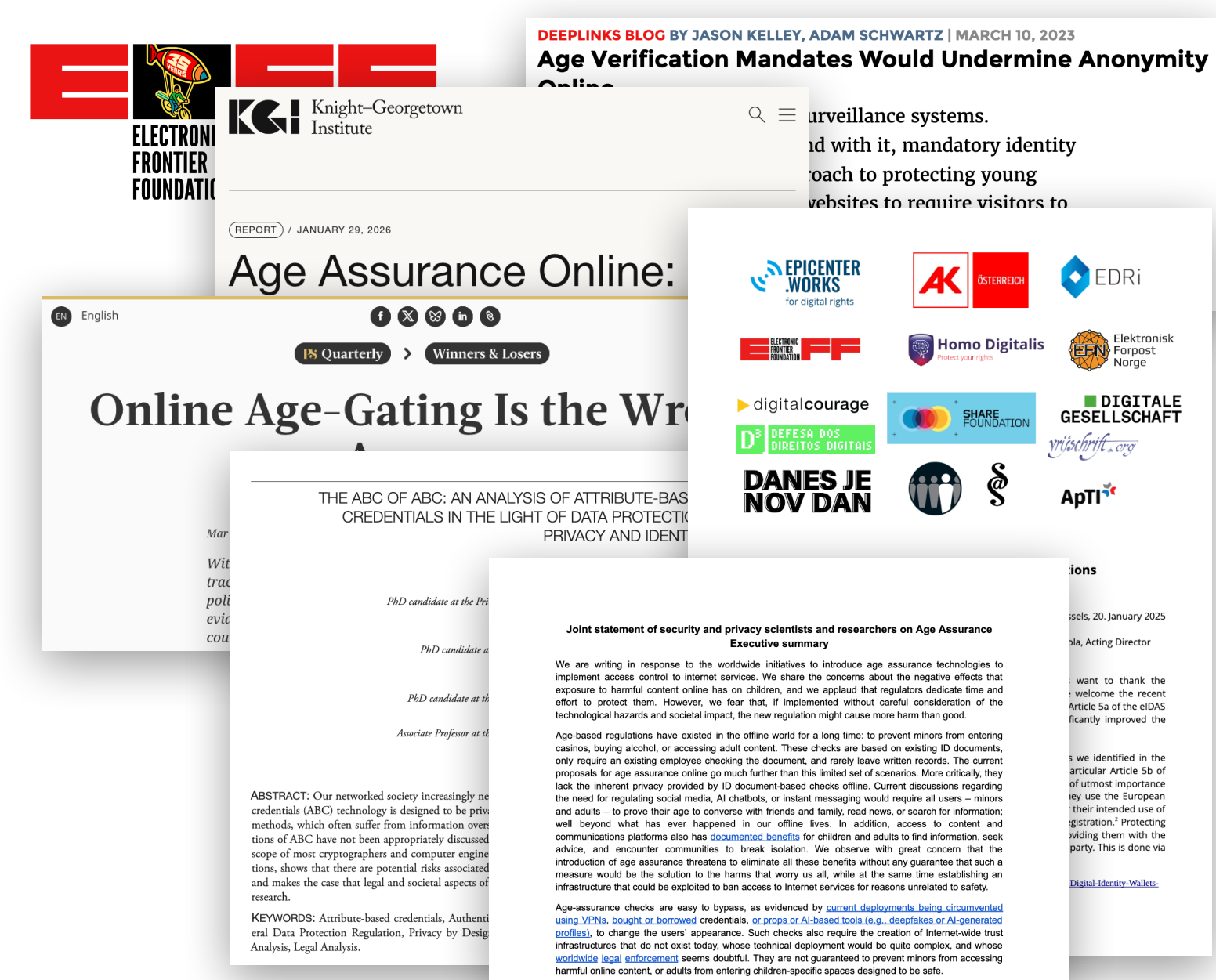
Joint statement of security and privacy scientists and researchers on Age Assurance Executive summary

We are writing in response to the worldwide initiatives to introduce age assurance technologies to implement access control to internet services. We share the concerns about the negative effects that exposure to harmful content online has on children, and we applaud that regulators dedicate time and effort to protect them. However, we fear that, if implemented without careful consideration of the technological hazards and societal impact, the new regulation might cause more harm than good.

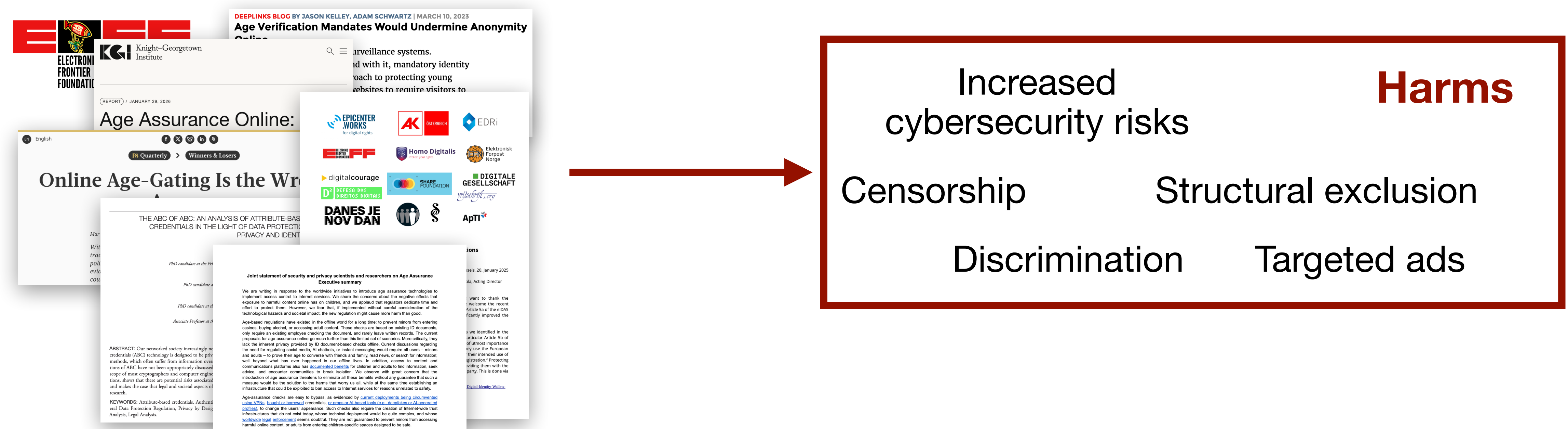
Age-based regulations have existed in the offline world for a long time: to prevent minors from entering casinos, buying alcohol, or accessing adult content. These checks are based on existing ID documents, only require an existing employee checking the document, and rarely leave written records. The current proposals for age assurance online go much further than this limited set of scenarios. More critically, they lack the inherent privacy provided by ID document-based checks offline. Current discussions regarding the need for regulating social media, AI chatbots, or instant messaging would require all users – minors and adults – to prove their age to converse with friends and family, read news, or search for information; well beyond what has ever happened in our offline lives. In addition, access to content and communications platforms also has [documented benefits](#) for children and adults to find information, seek advice, and encounter communities to break isolation. We observe with great concern that the

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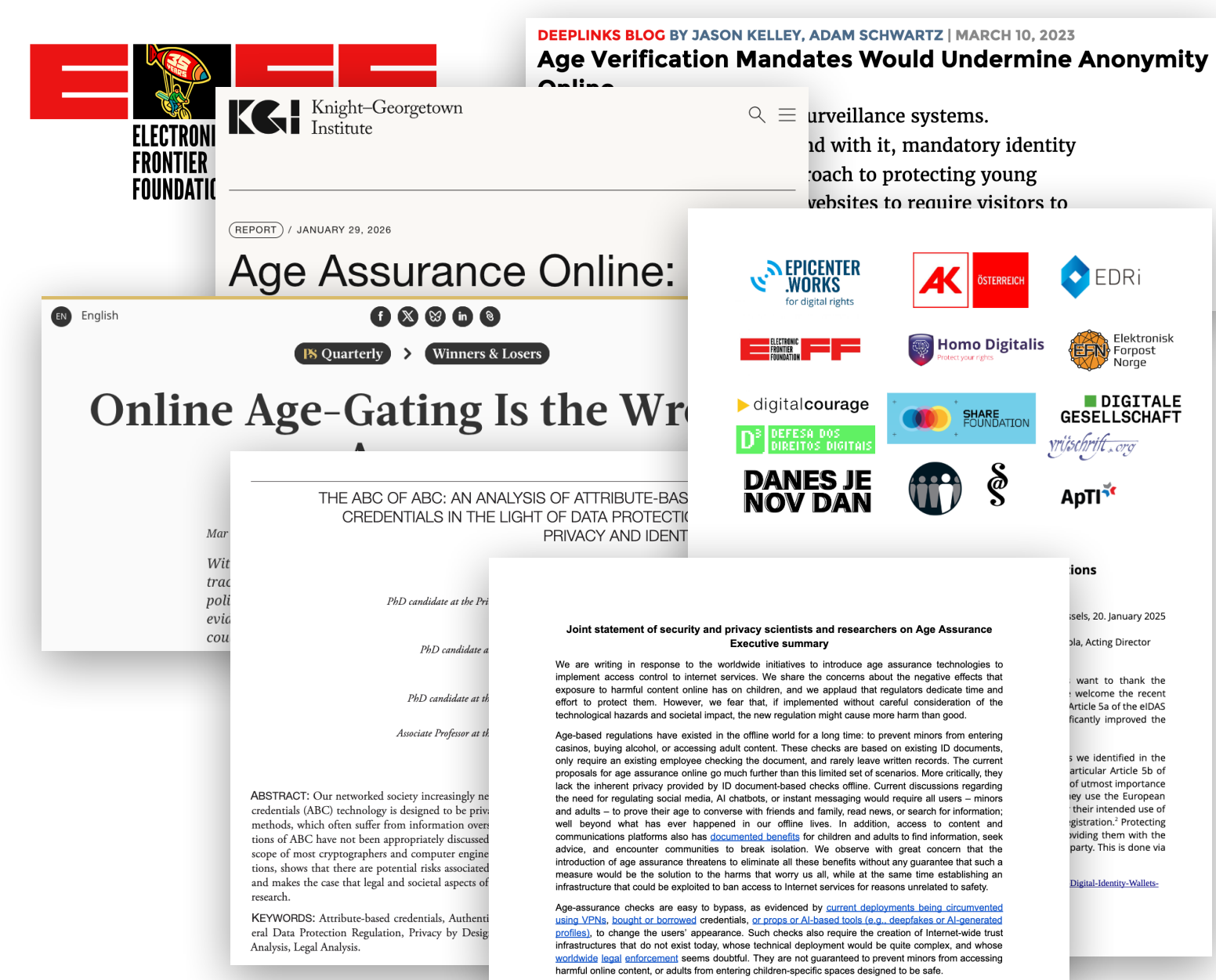
Understanding Pathways to Harm: Age Verification



Understanding Pathways to Harm: Age Verification



Understanding Pathways to Harm: Age Verification



Increased cybersecurity risks

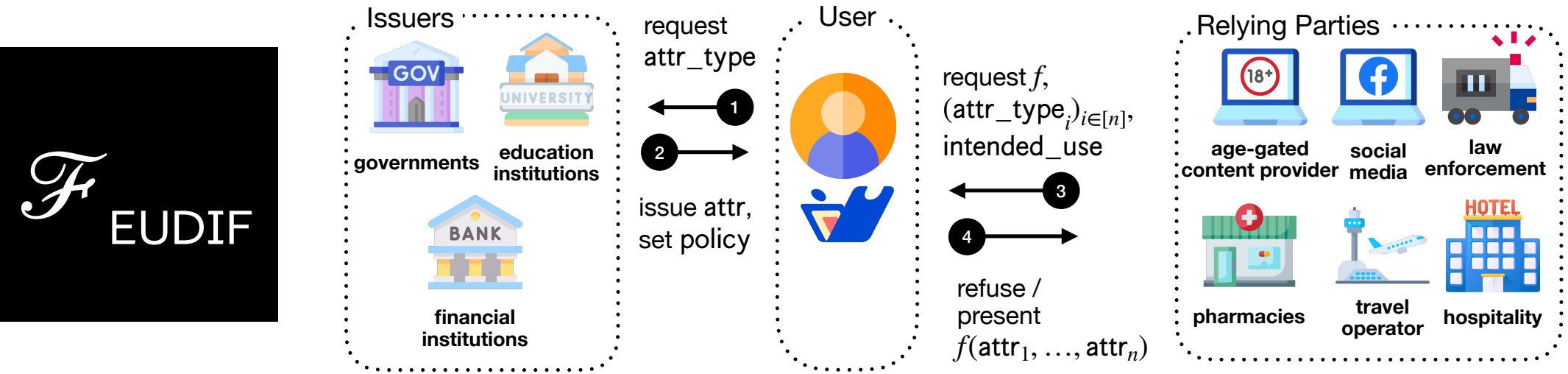
Censorship

Discrimination

Structural exclusion

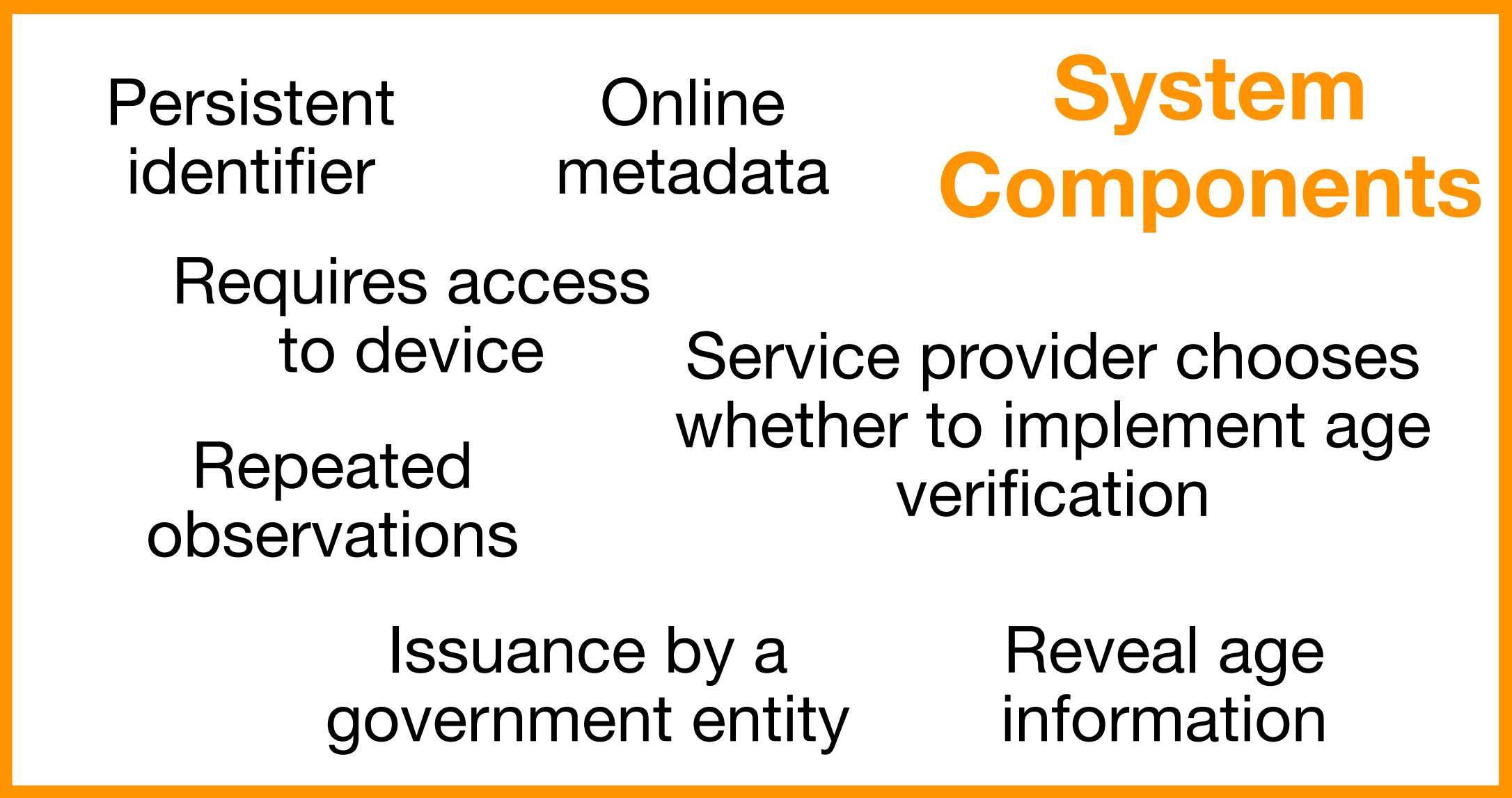
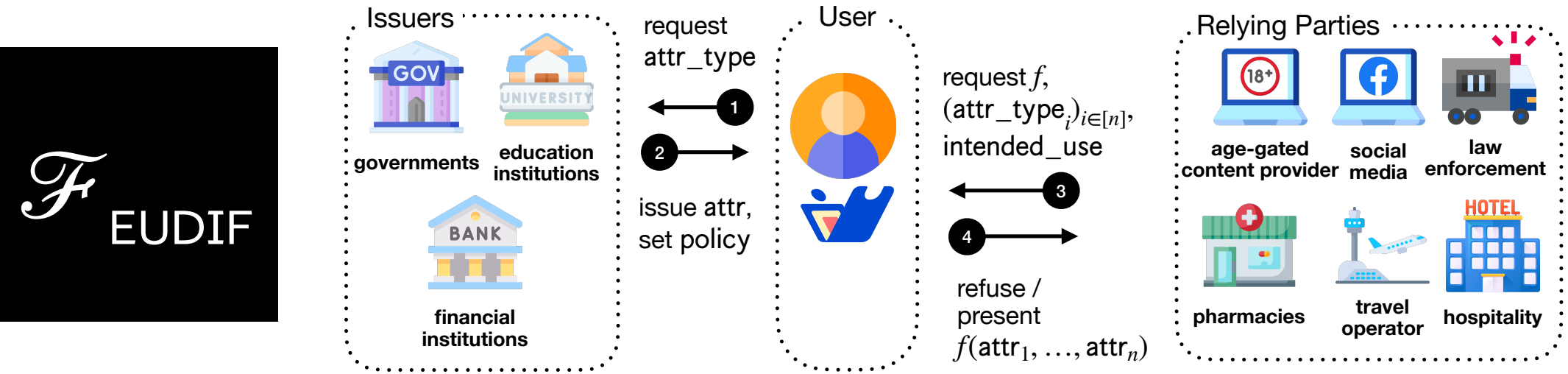
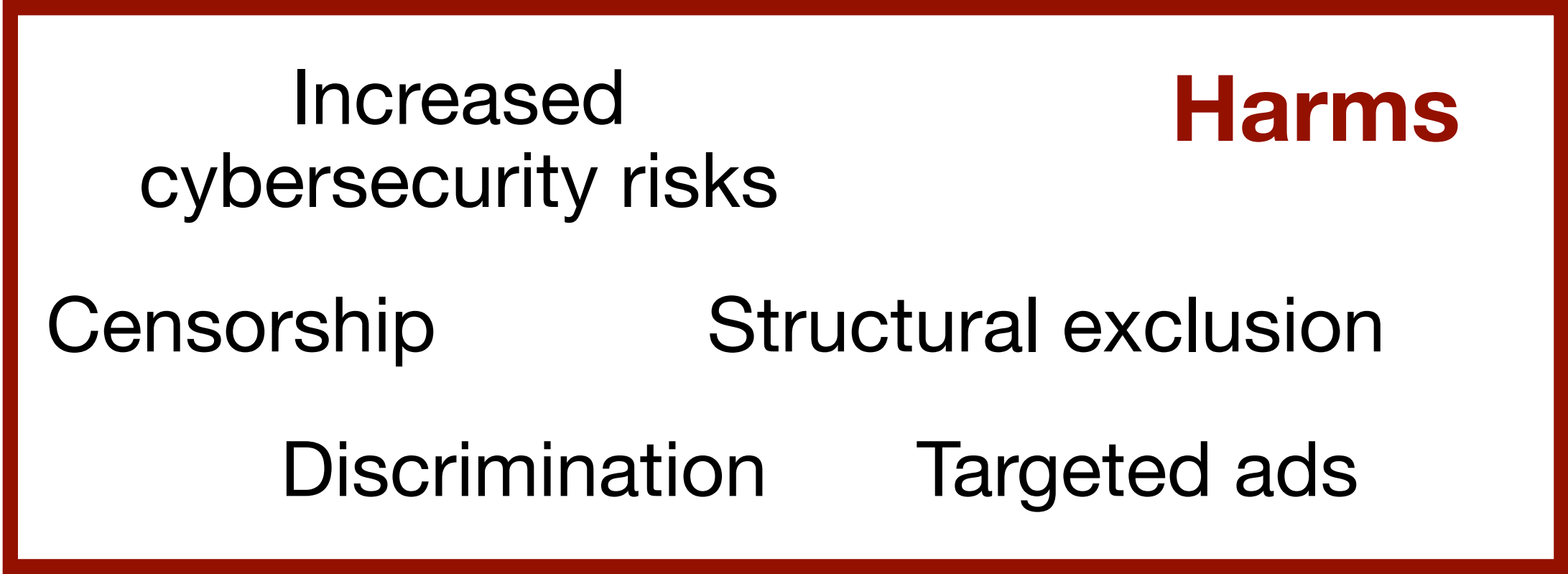
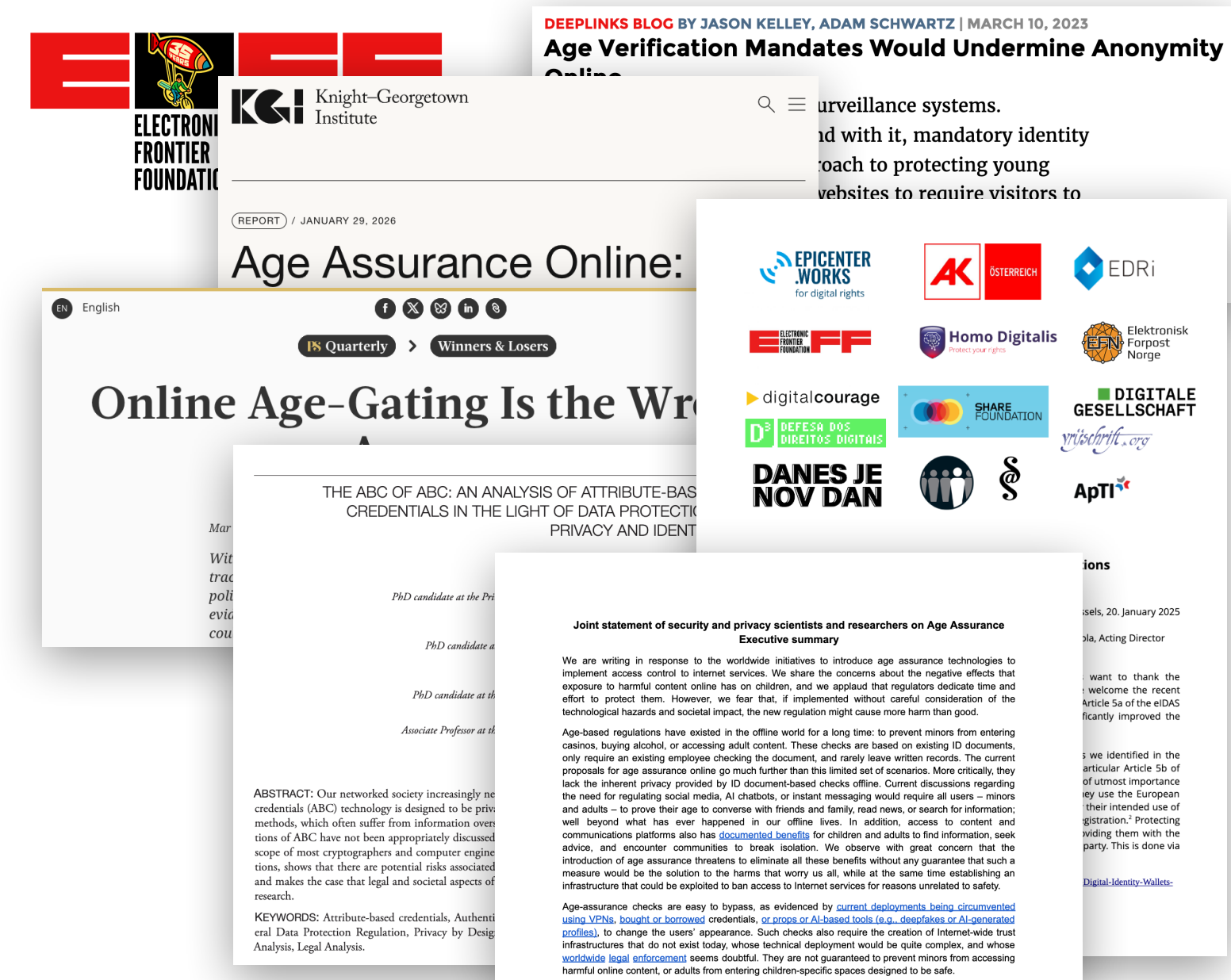
Targeted ads

Harms



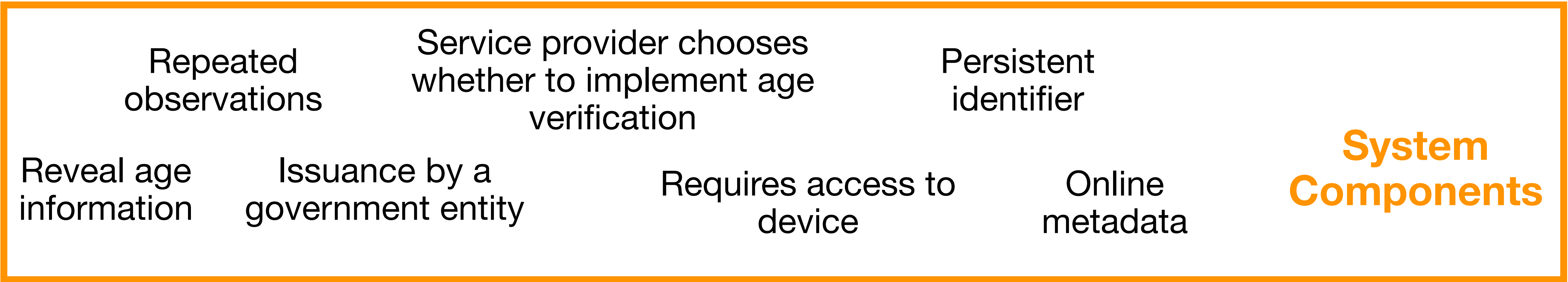
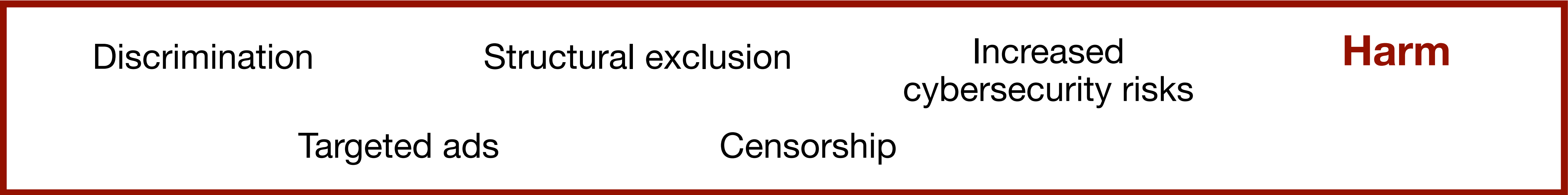
+ “naive” implementation in a digital context

Understanding Pathways to Harm: Age Verification

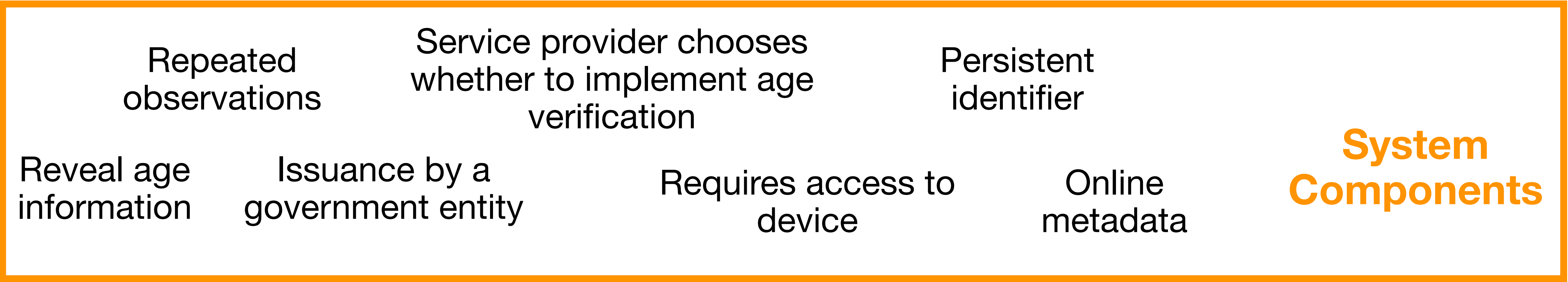
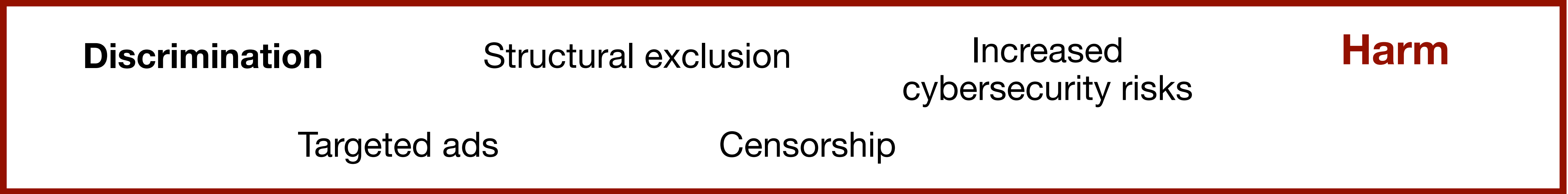


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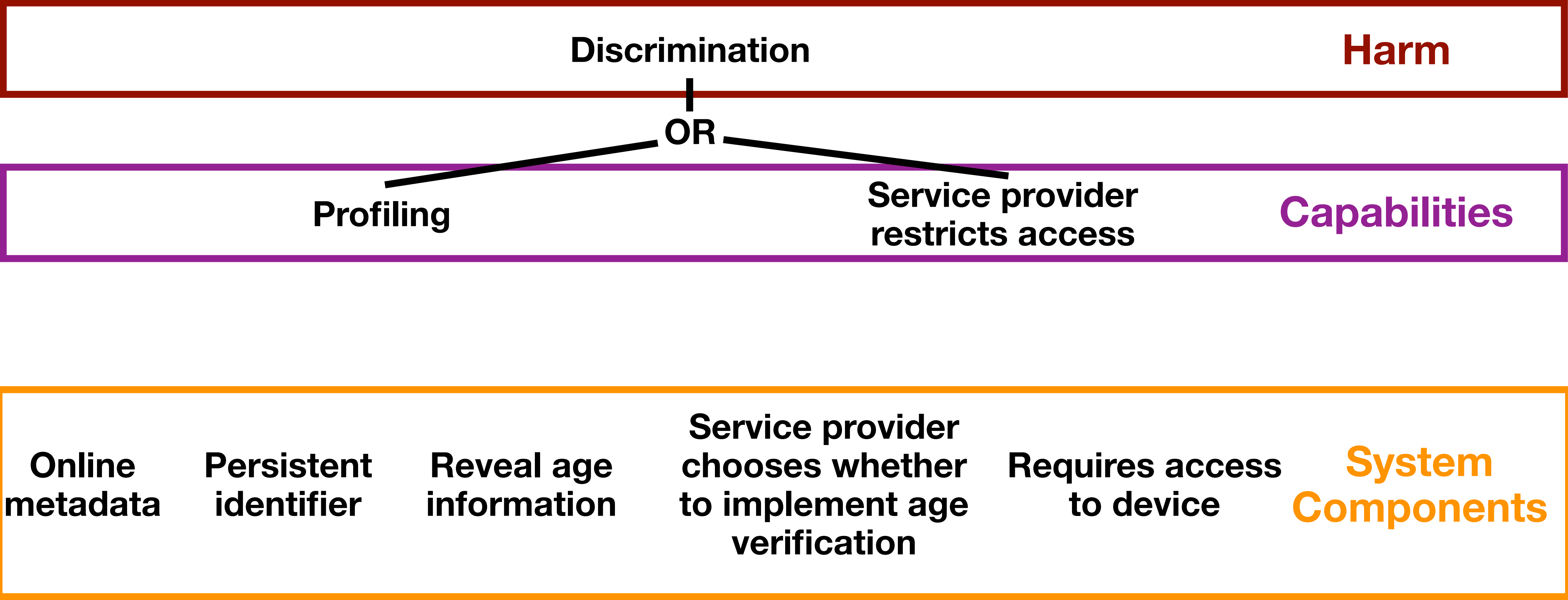
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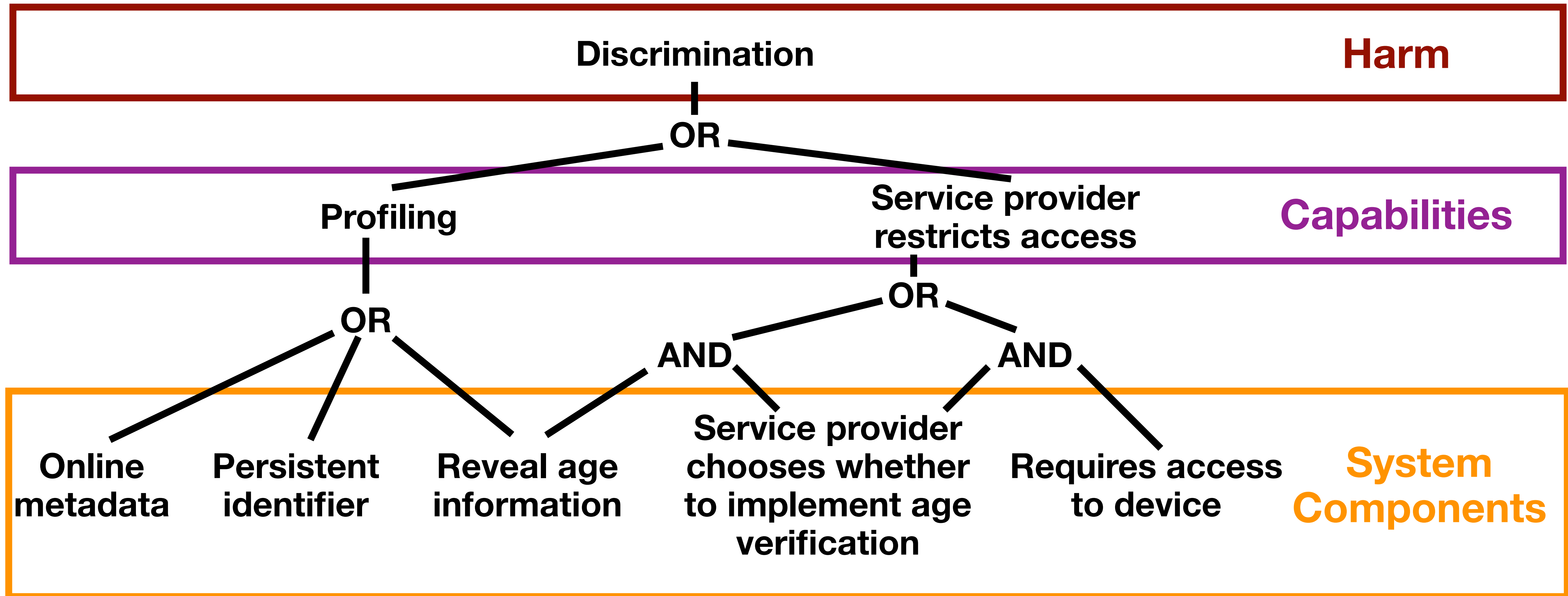
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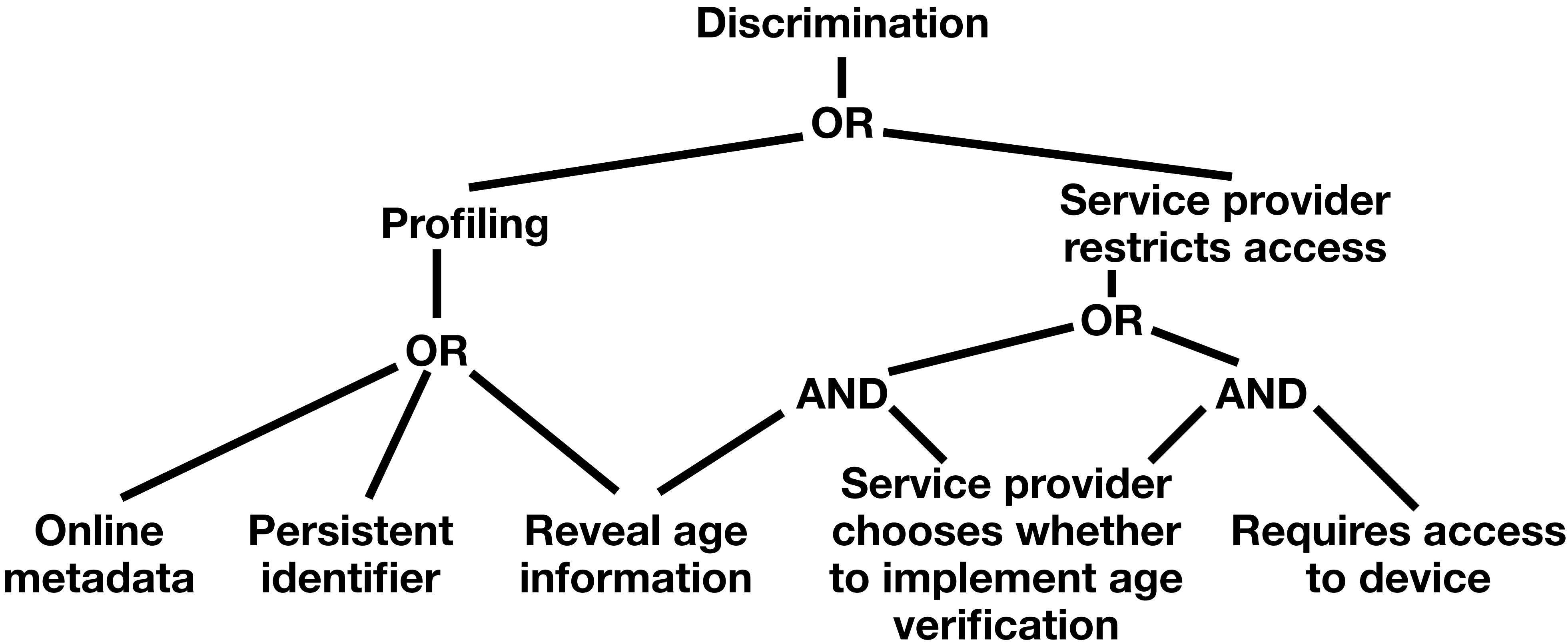
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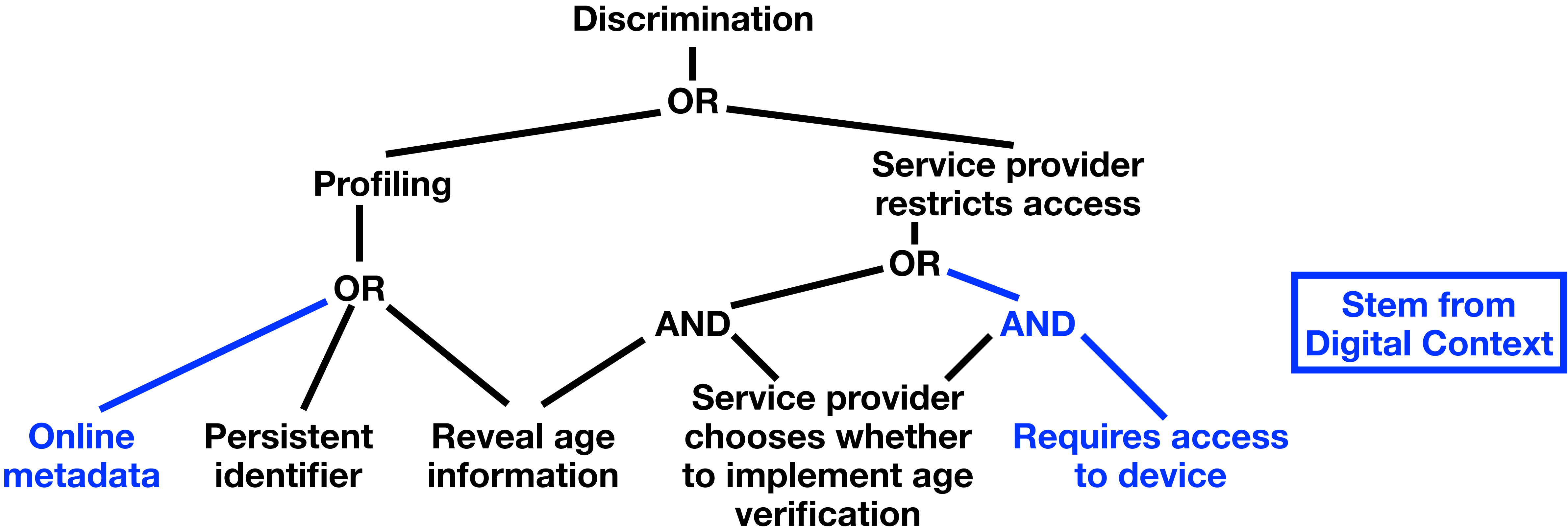
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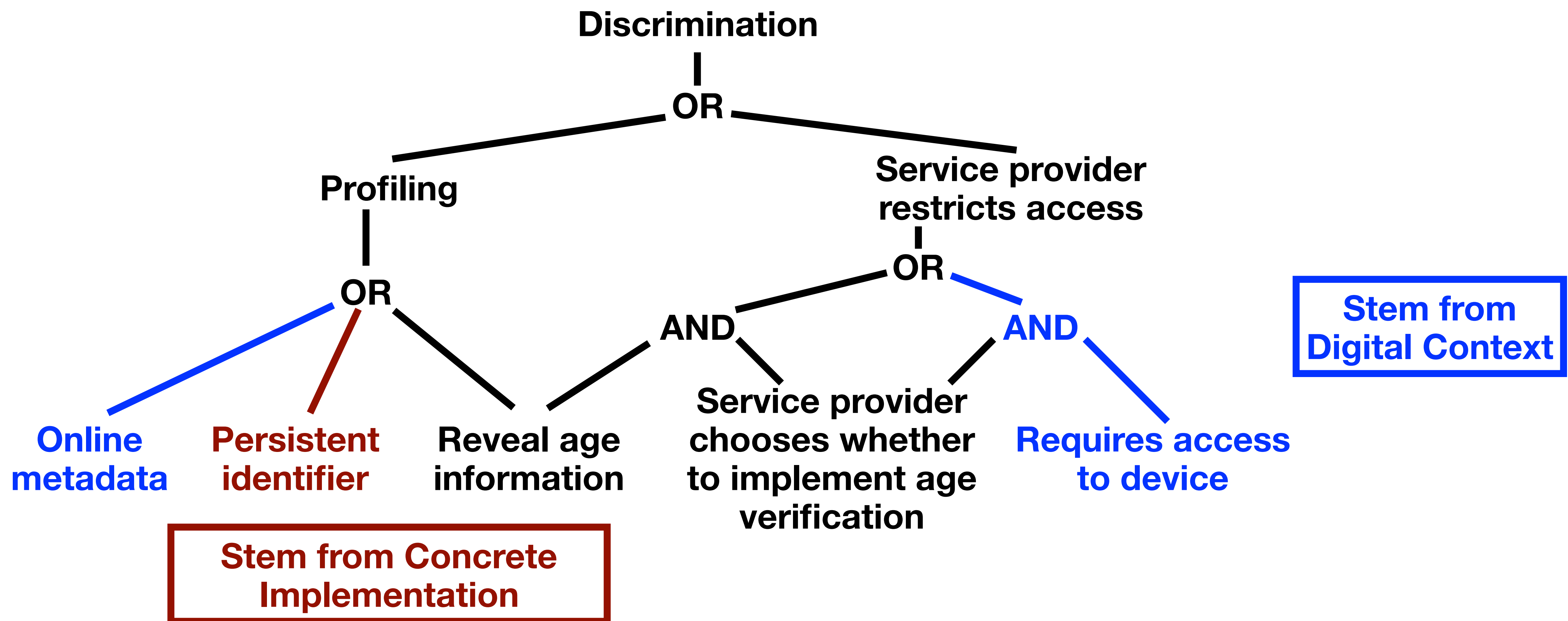
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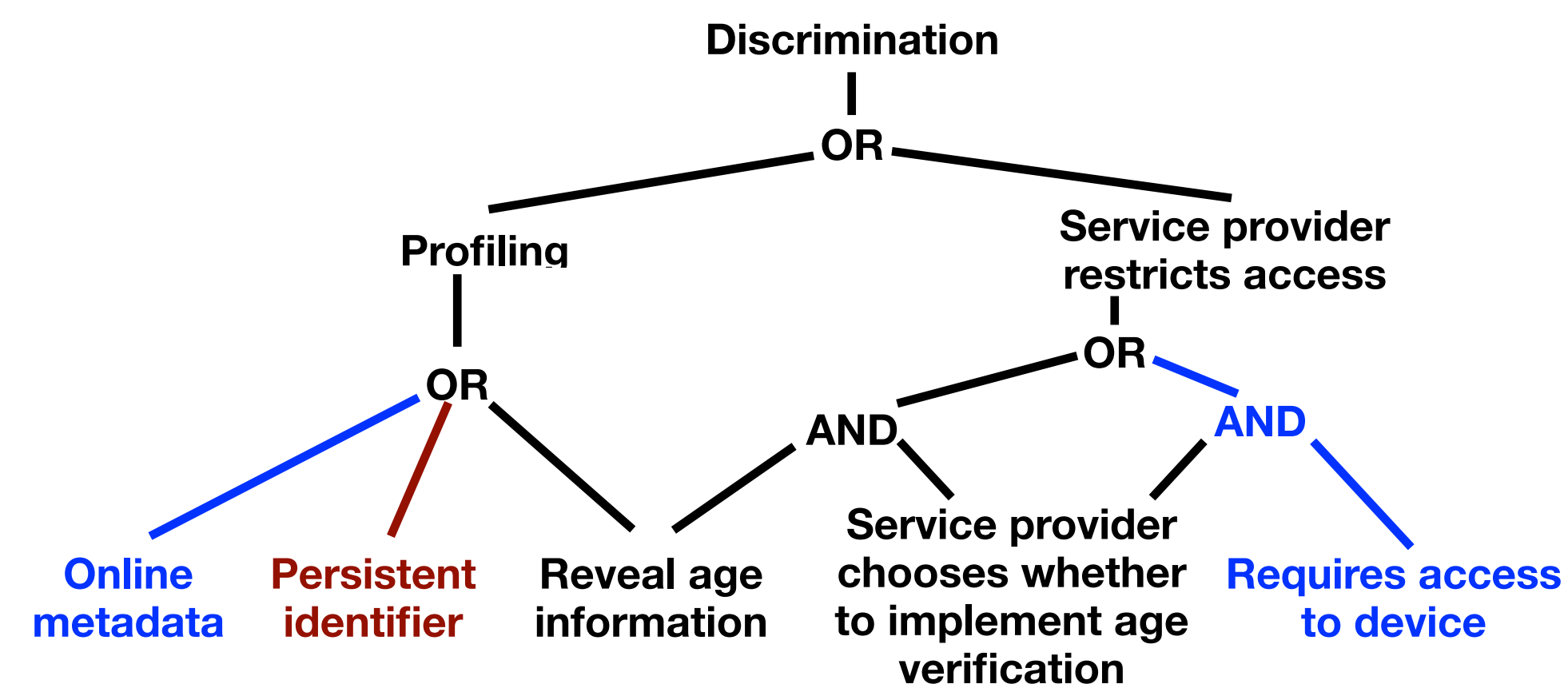
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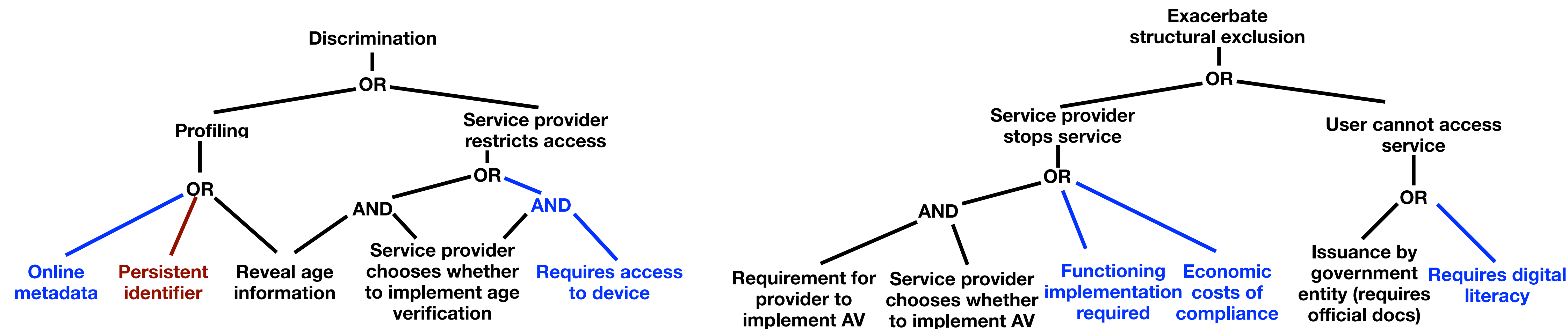
Understanding Pathways to Harm: Age Verification



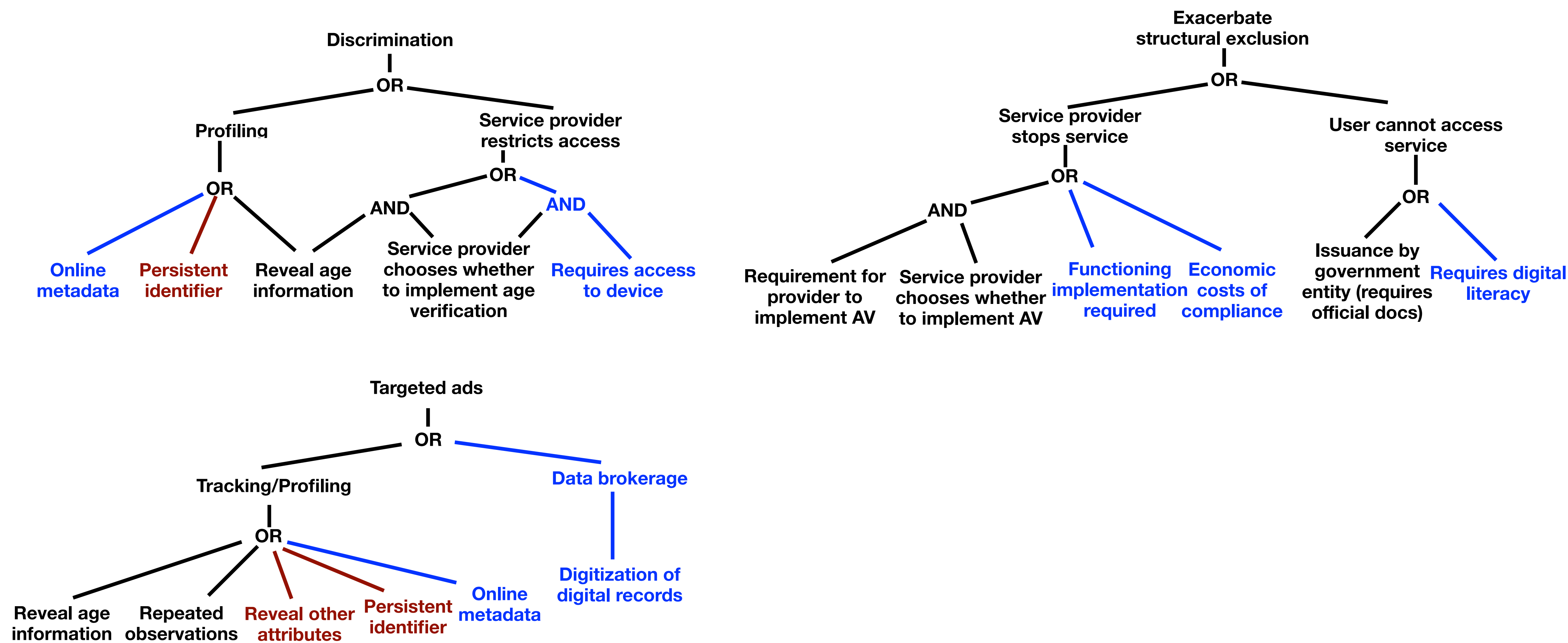
Understanding Pathways to Harm: Age Verification



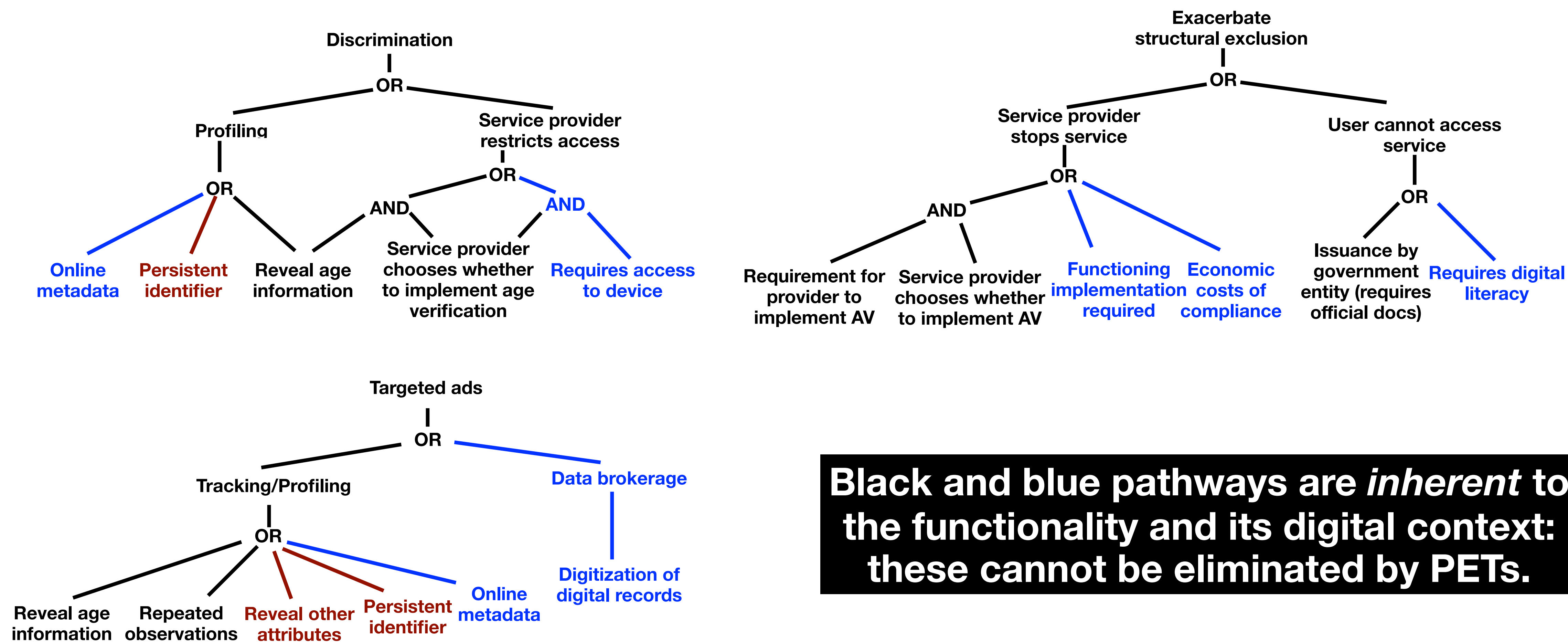
Understanding Pathways to Harm: Age Verification



Understanding Pathways to Harm: Age Verification



Understanding Pathways to Harm: Age Verification



Understanding Pathways to Harm: Mobile Driving Licenses



Car rental service requires driving license information.

Understanding Pathways to Harm: Mobile Driving Licenses



Car rental service requires driving license information.



User uploads mobile driving license and identity information to rental website when booking.

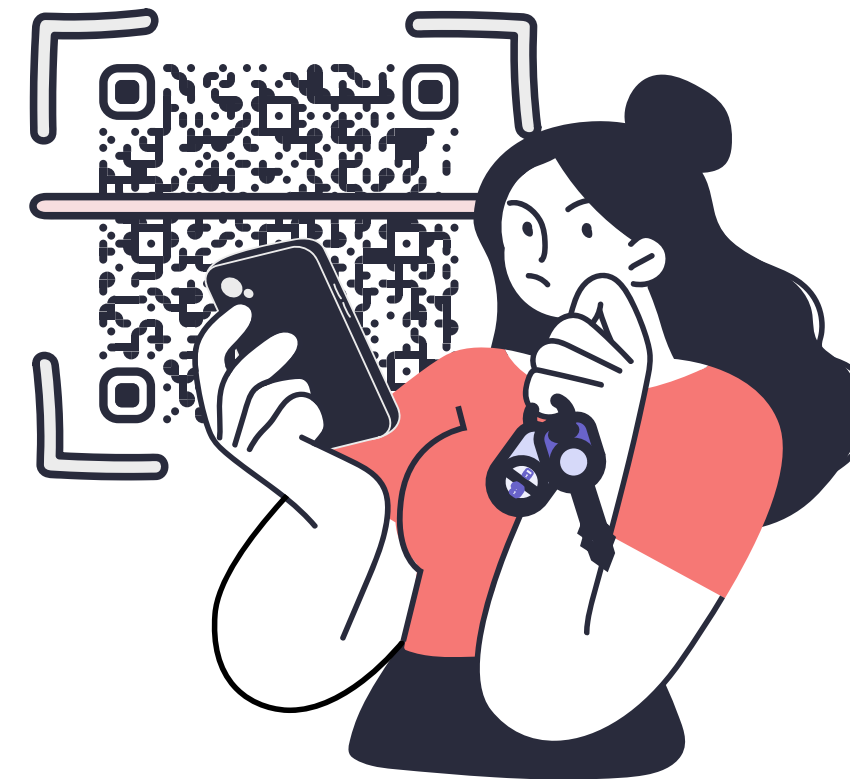
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In person: Clerk checks user's wallet information from their device, and verifies user's identity.

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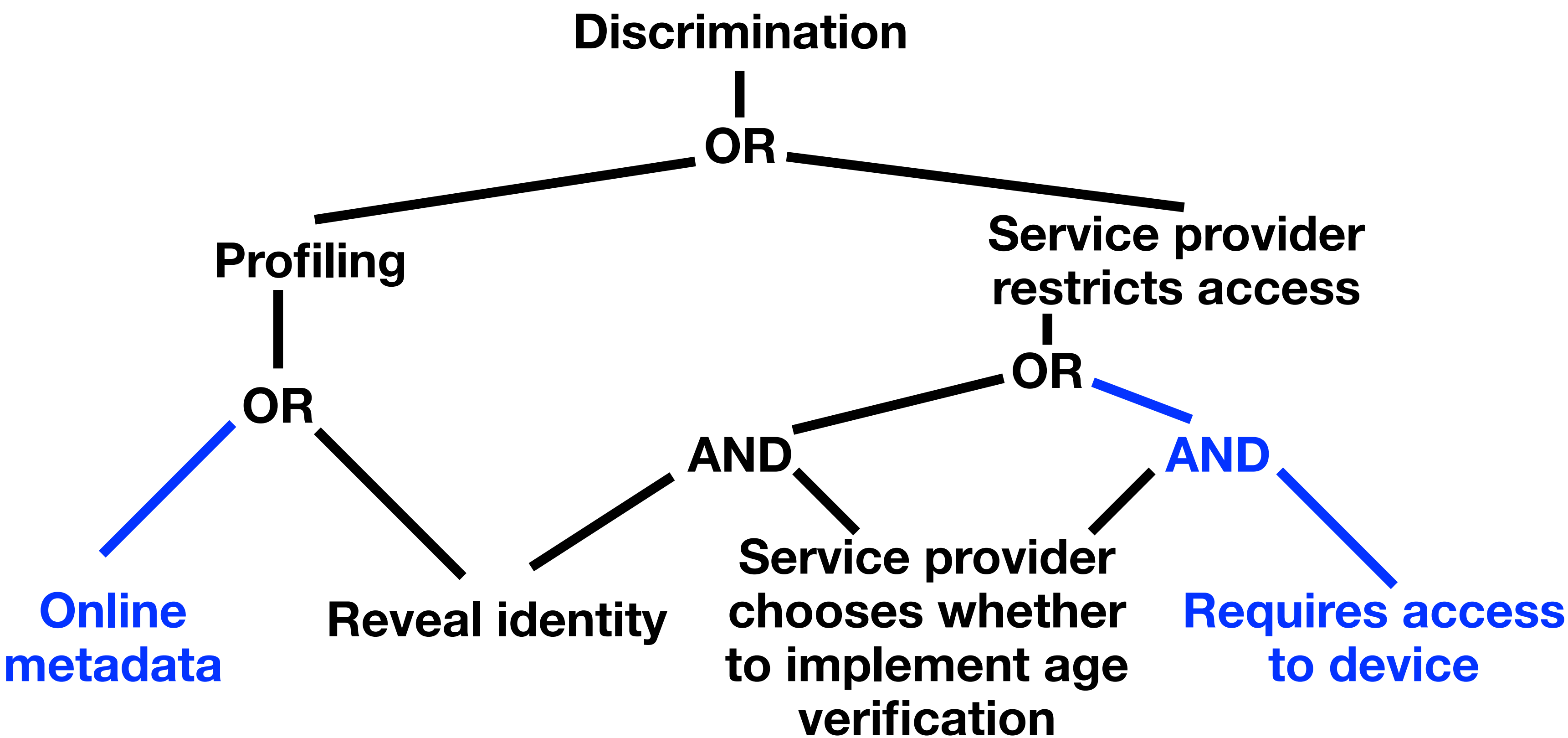


In person: Clerk checks user's wallet information from their device, and verifies user's identity.

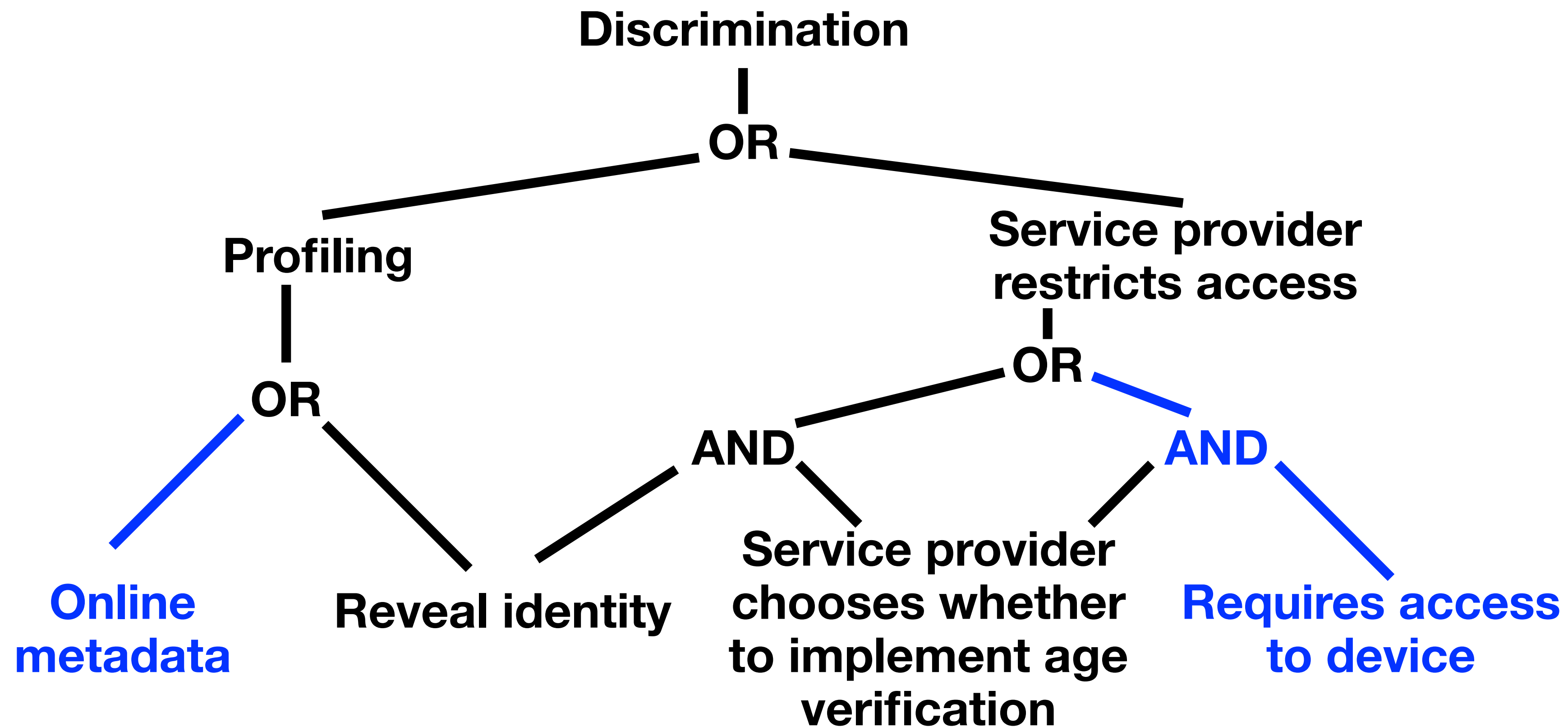


User obtains car rental.

Understanding Pathways to Harm: Mobile Driving Licenses



Understanding Pathways to Harm: Mobile Driving Licenses



PETs cannot eliminate harms in identity use cases.

PETs cannot eliminate harms from identity use cases:



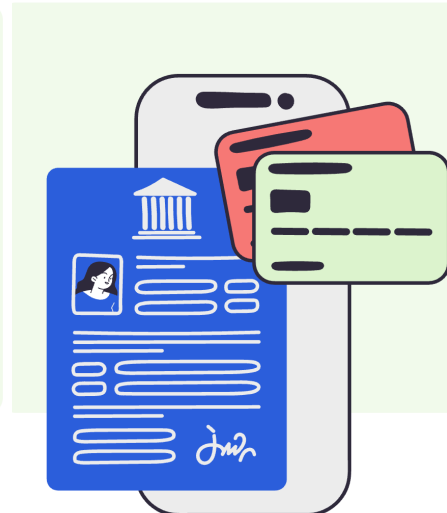
payments



**professional
credentials**



buy SIM



**open bank
accounts**



**access public
services**



**mobile driving
license**



**show
diplomas**



claim benefits



**claim
prescription**



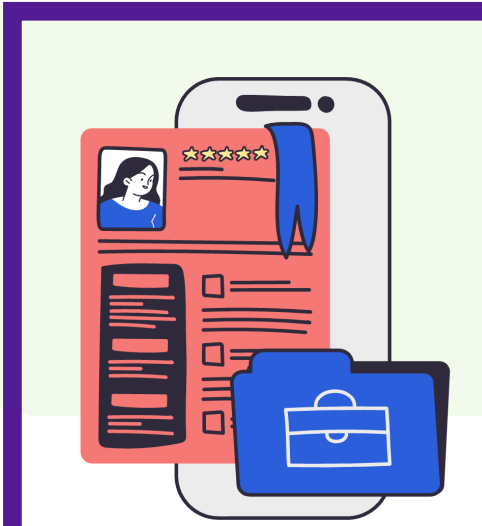
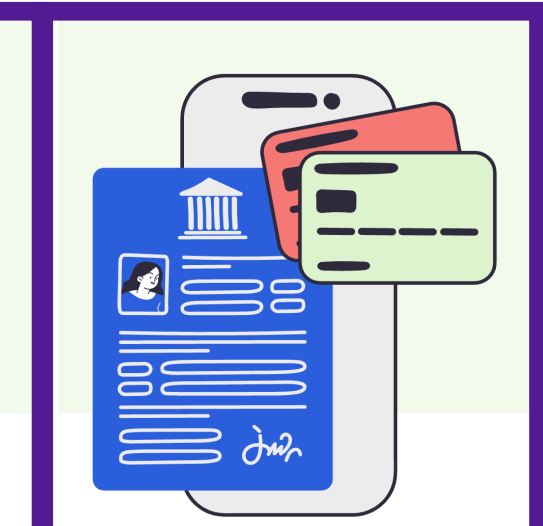
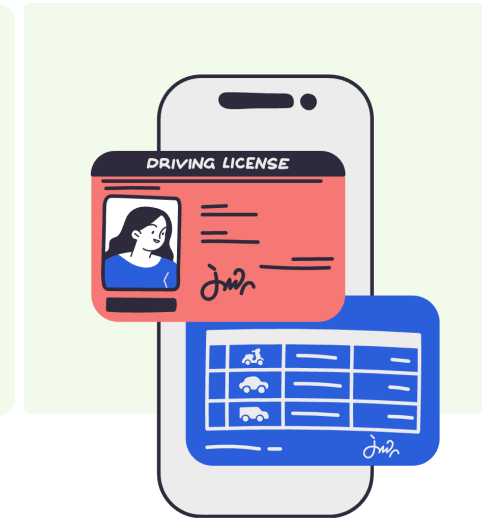
**show travel
tickets + ID**



**sign
contracts**

**and many
more!**

PETs cannot eliminate harms from identity use cases:

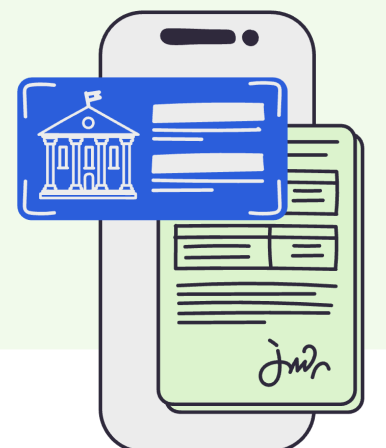
 payments	 professional credentials	 buy SIM	 open bank accounts
 access public services	 mobile driving license	 show diplomas	 claim benefits
 claim prescription	 show travel tickets + ID	 sign contracts	

Use cases are not yet specified (but likely need identity)...

and many more!

PETs cannot eliminate harms from identity use cases:

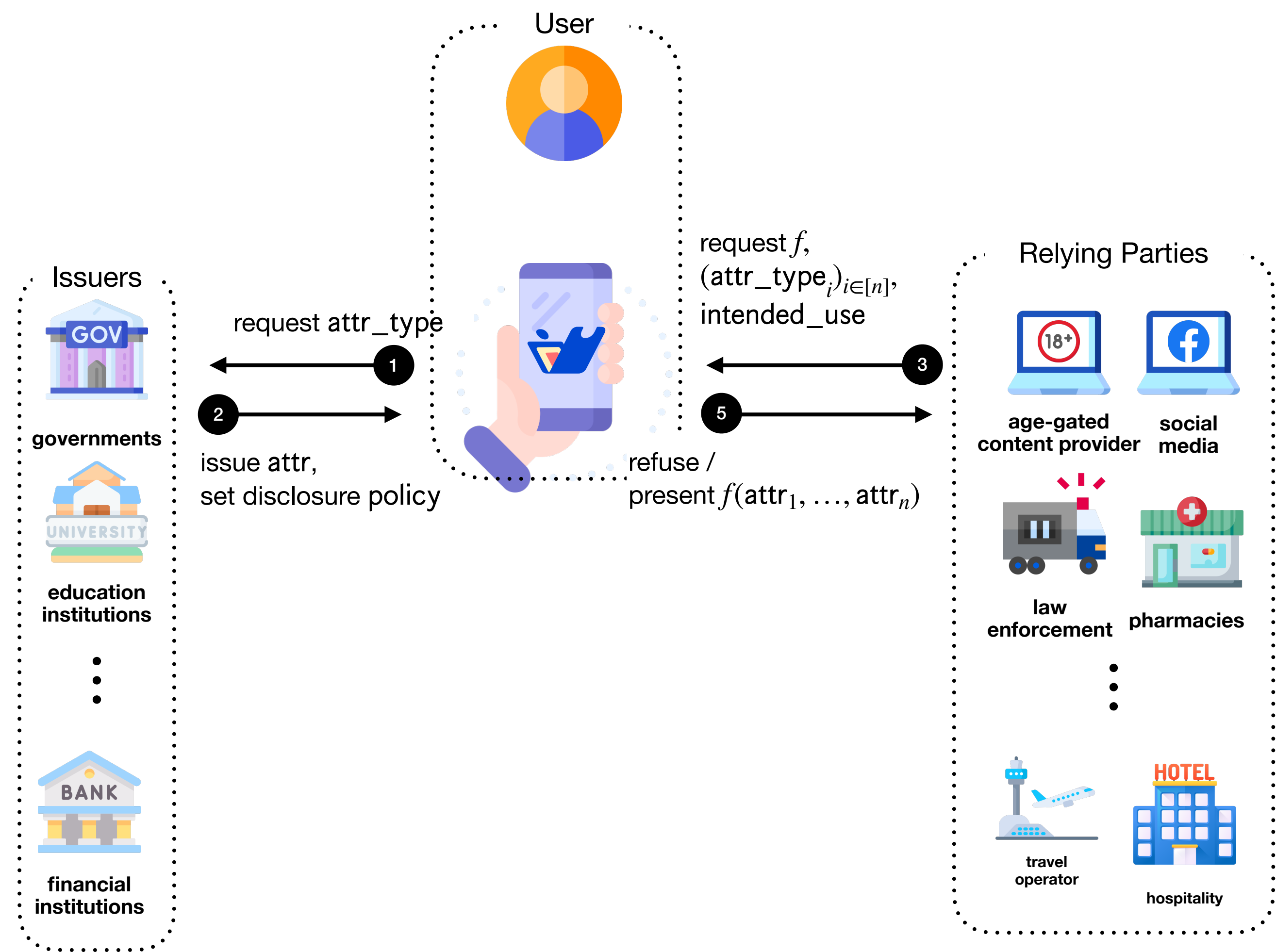
*...or already
require identity*

 payments	 professional credentials	 buy SIM	 open bank accounts
 access public services	 mobile driving license	 show diplomas	 claim benefits
 claim prescription	 show travel tickets + ID	 sign contracts	

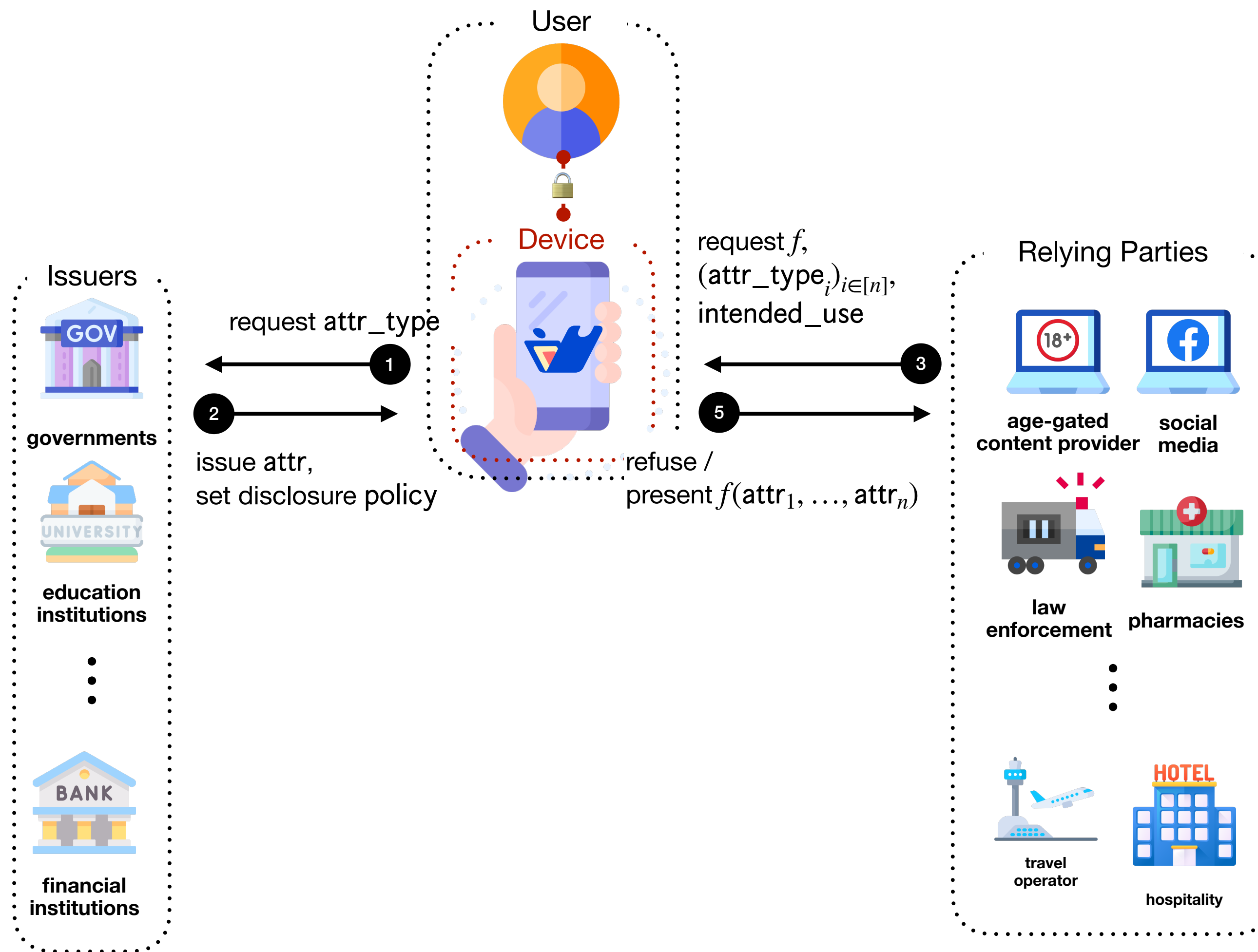
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Deployment requirements introduce new pathways

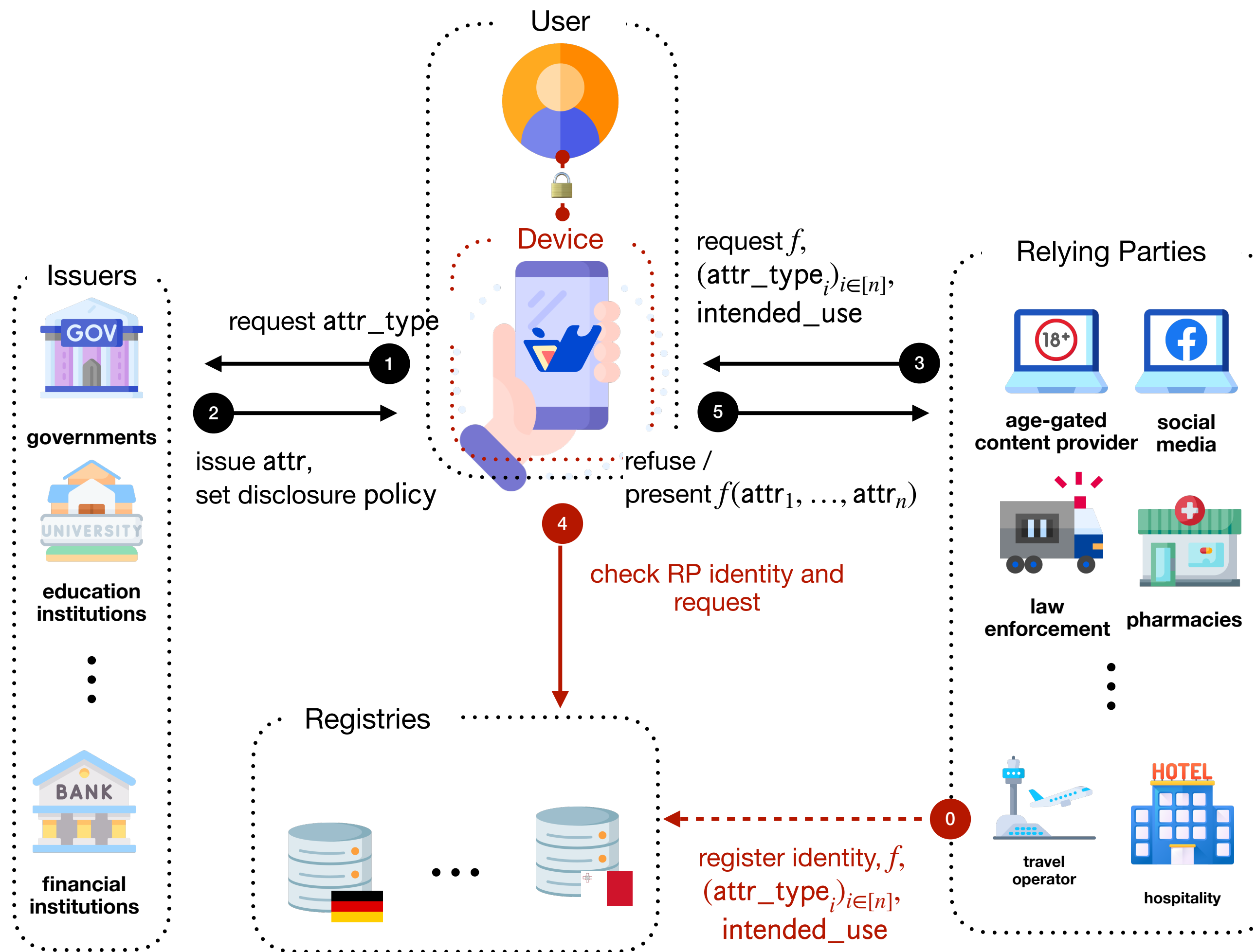


Deployment requirements introduce new pathways



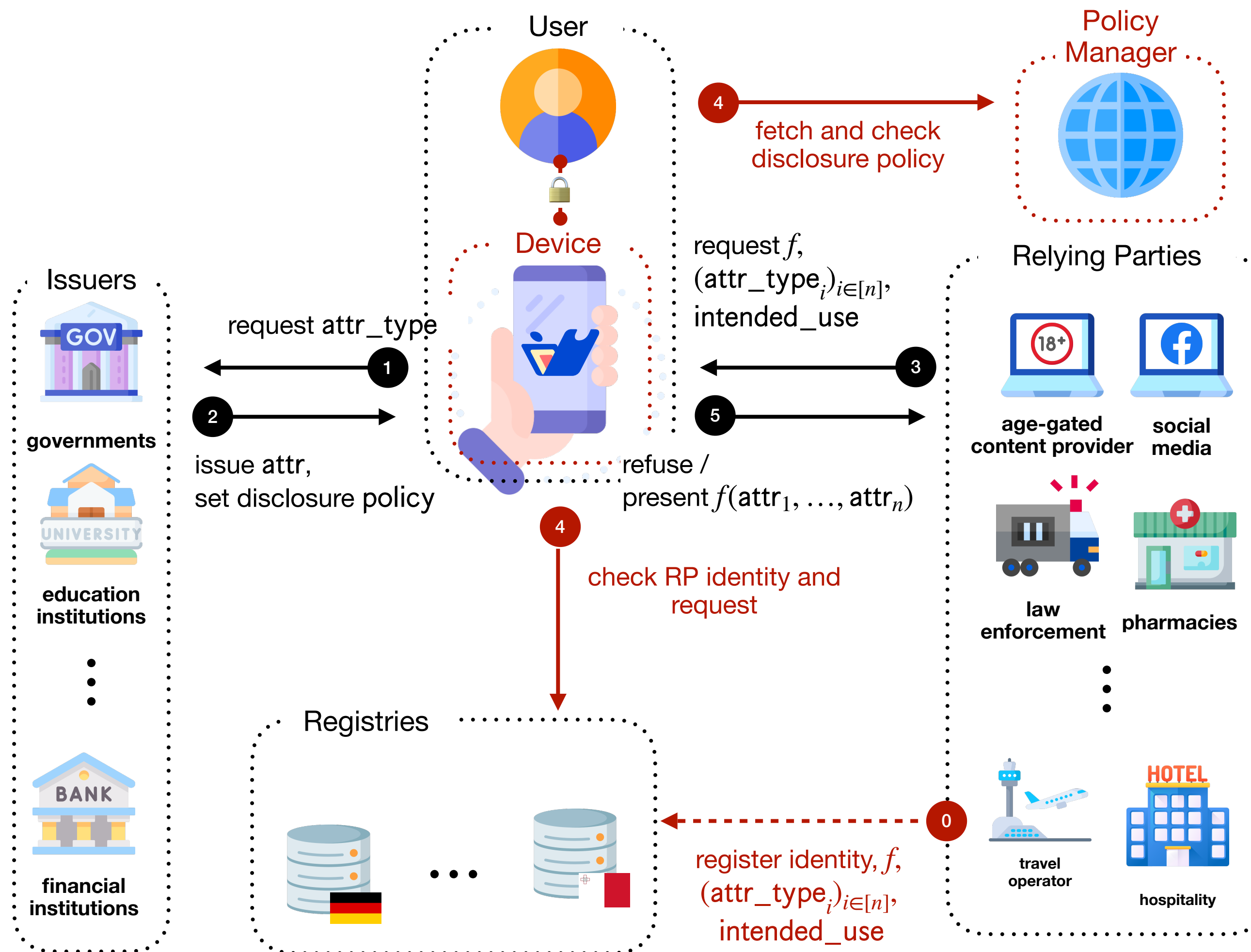
- Device requirements (incl. binding) increase exclusion risk.

Deployment requirements introduce new pathways



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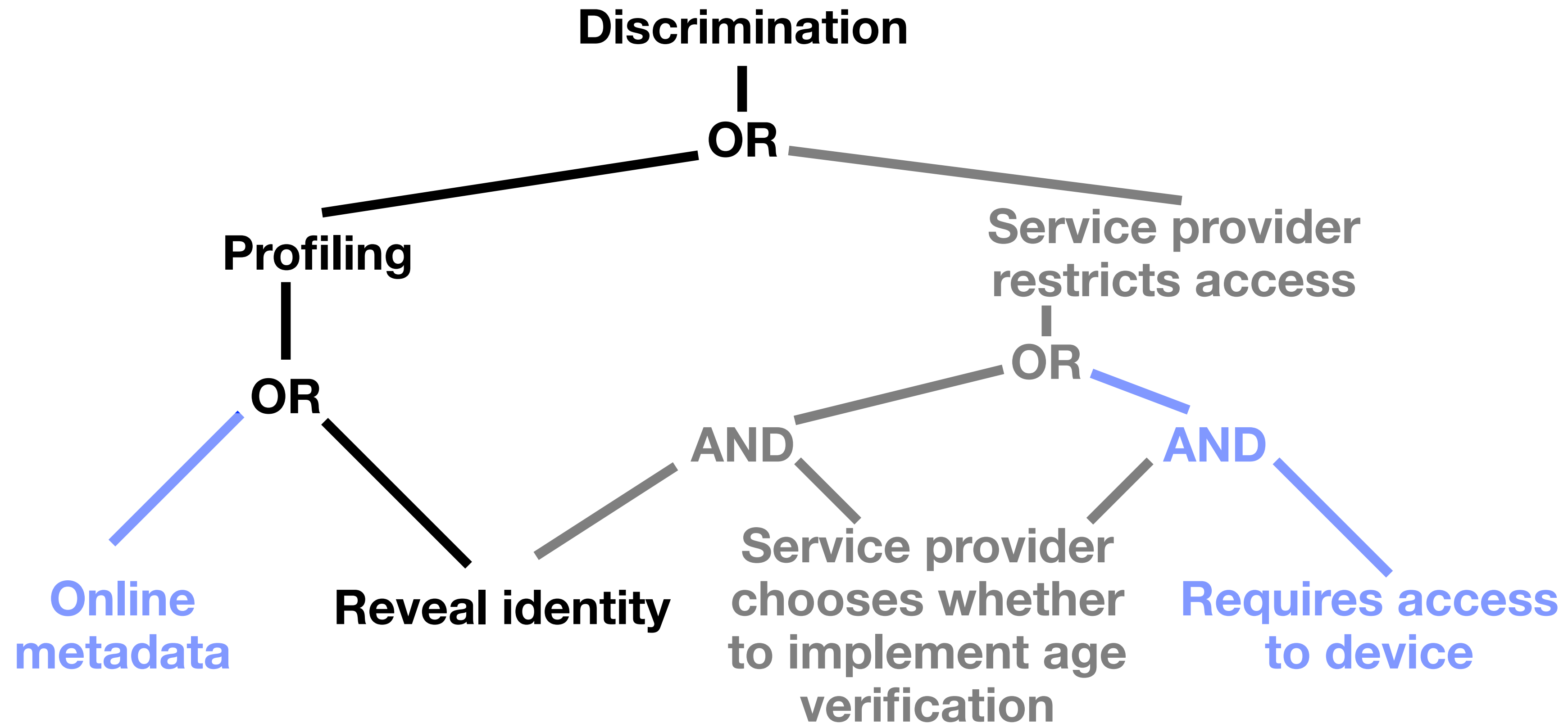
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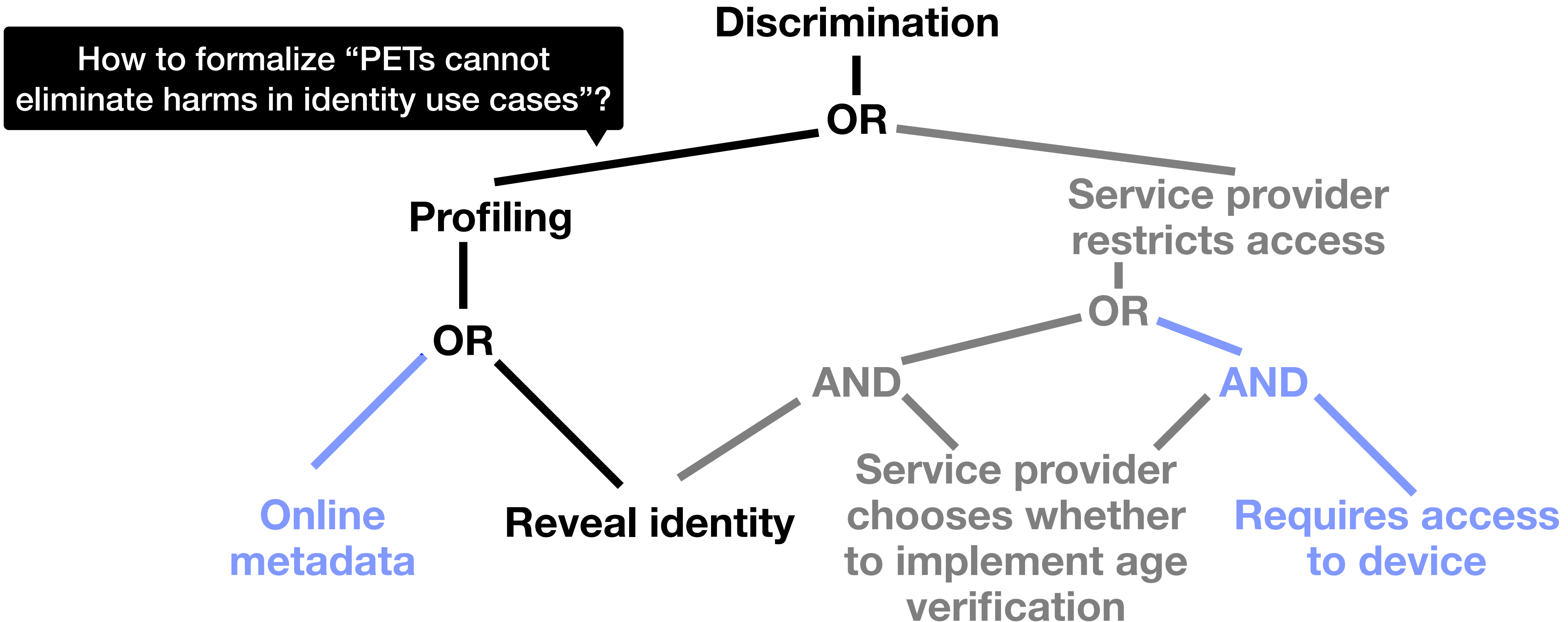
- Device requirements (incl. binding) increase exclusion risk.
- RP registration authorities, and policy managers introduce new entities that learn information.

**Fundamental
harm-enabling capabilities**

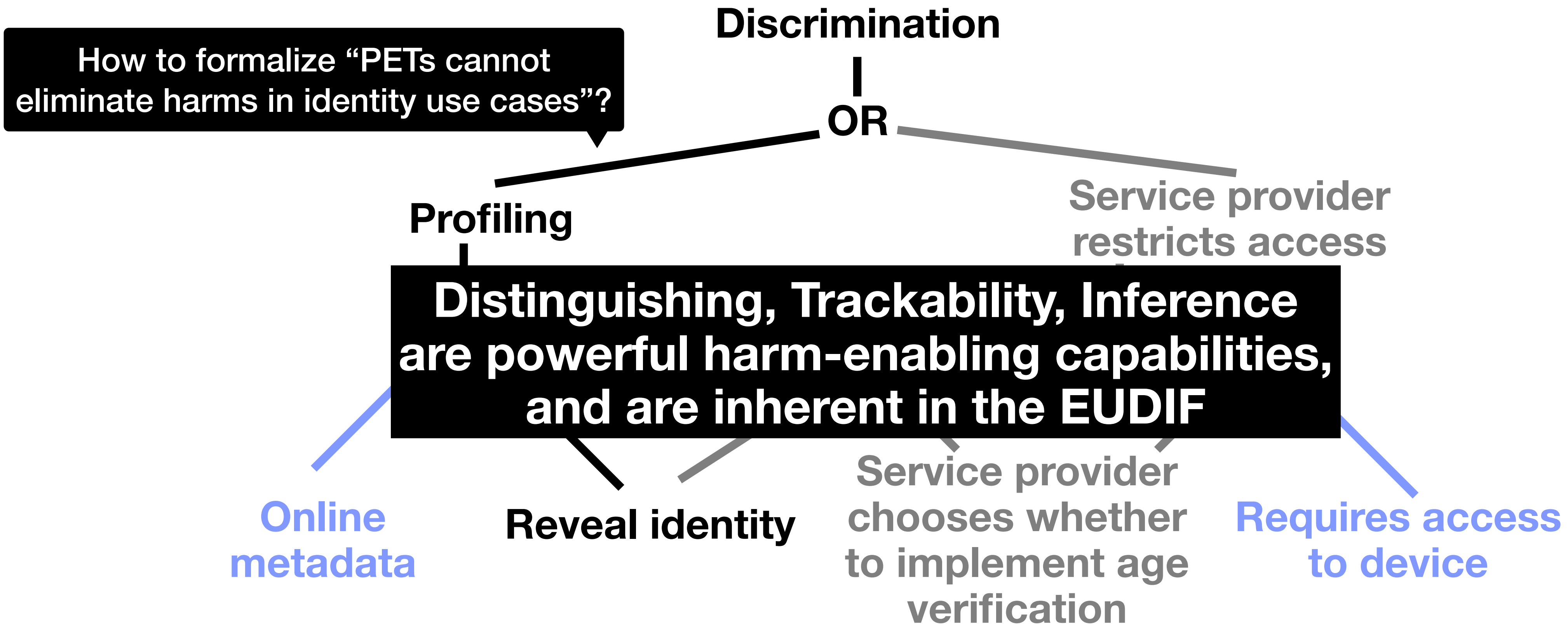
Fundamental harm-enabling capabilities



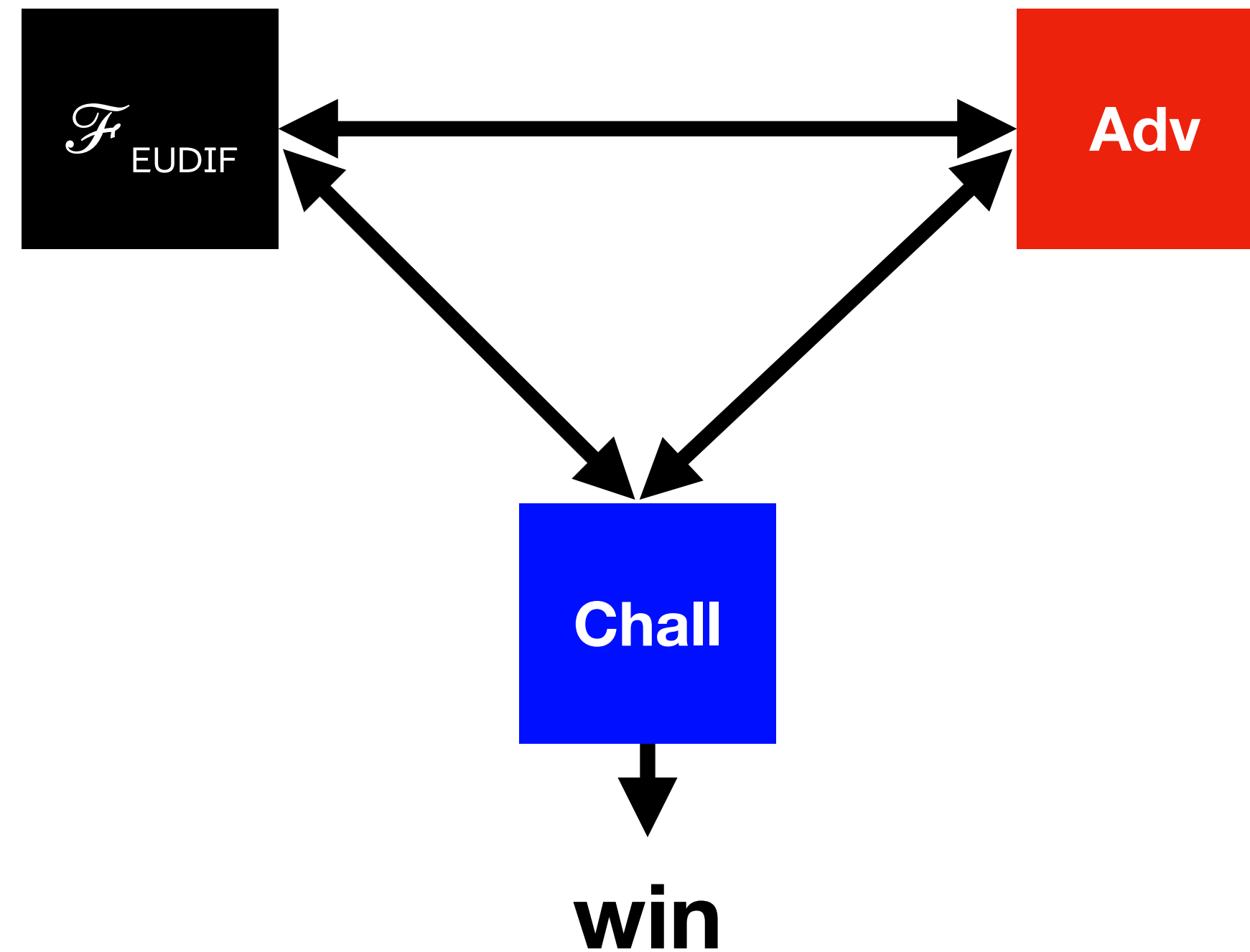
Fundamental harm-enabling capabilities



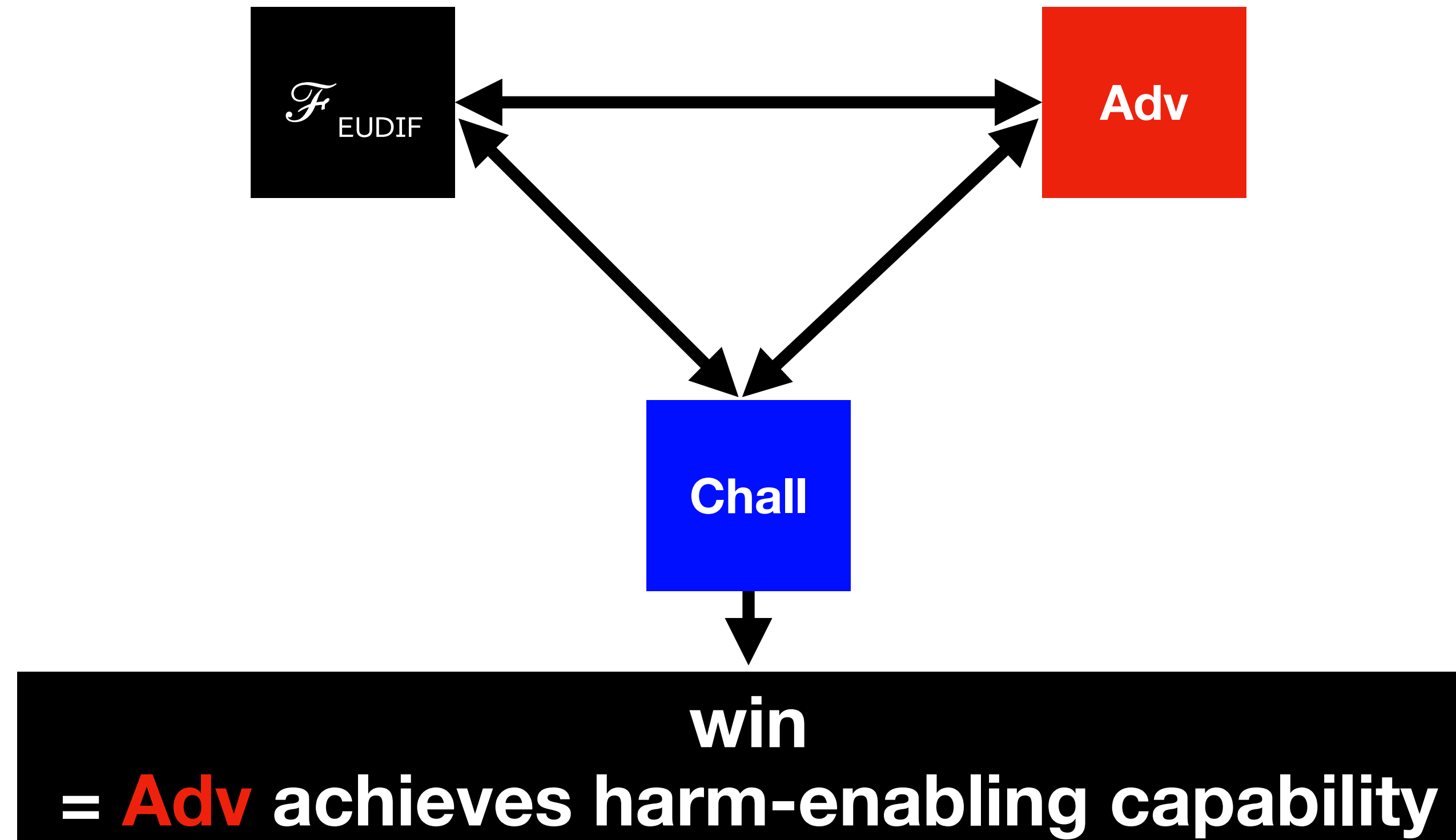
Fundamental harm-enabling capabilities



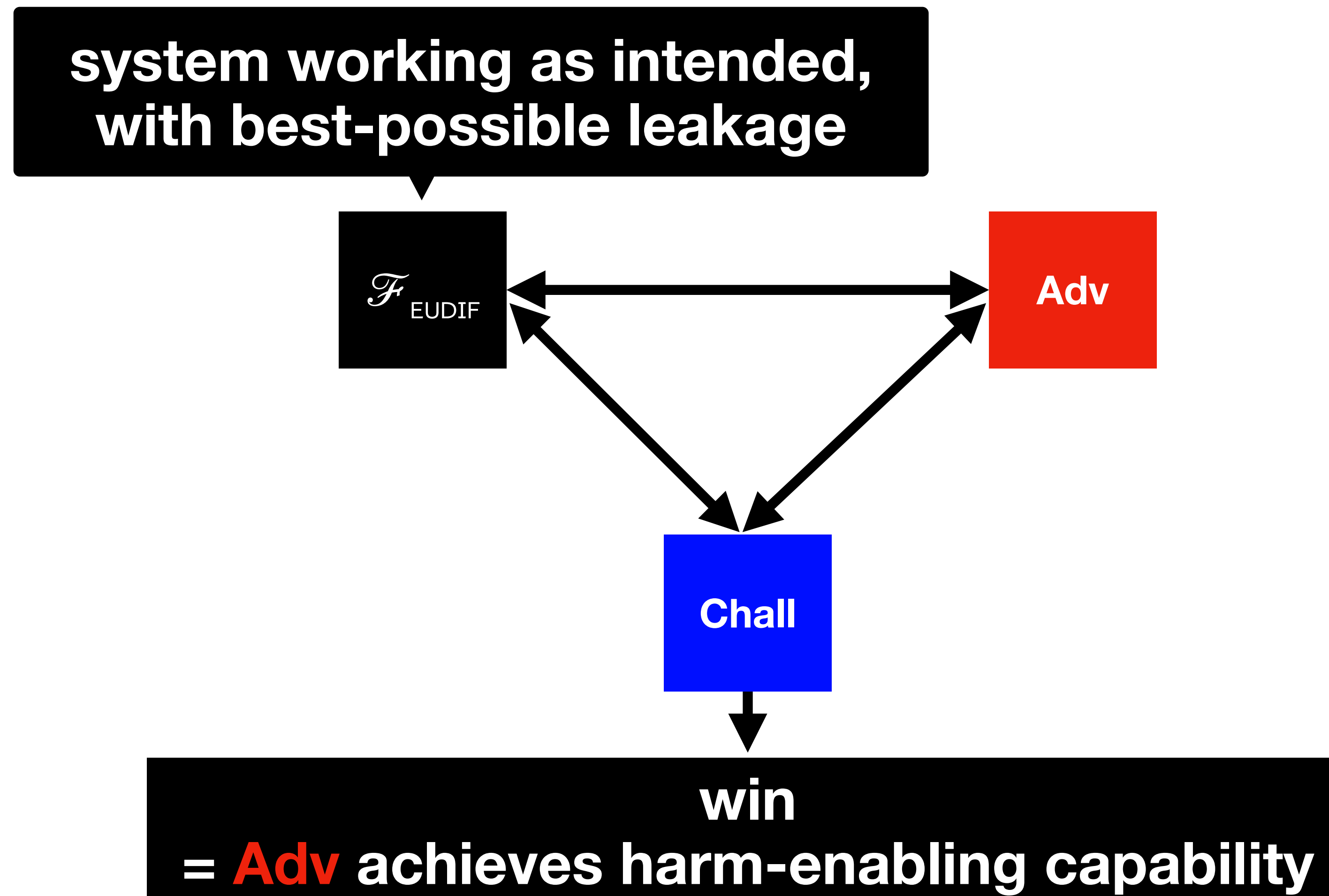
Fundamental harm-enabling capabilities



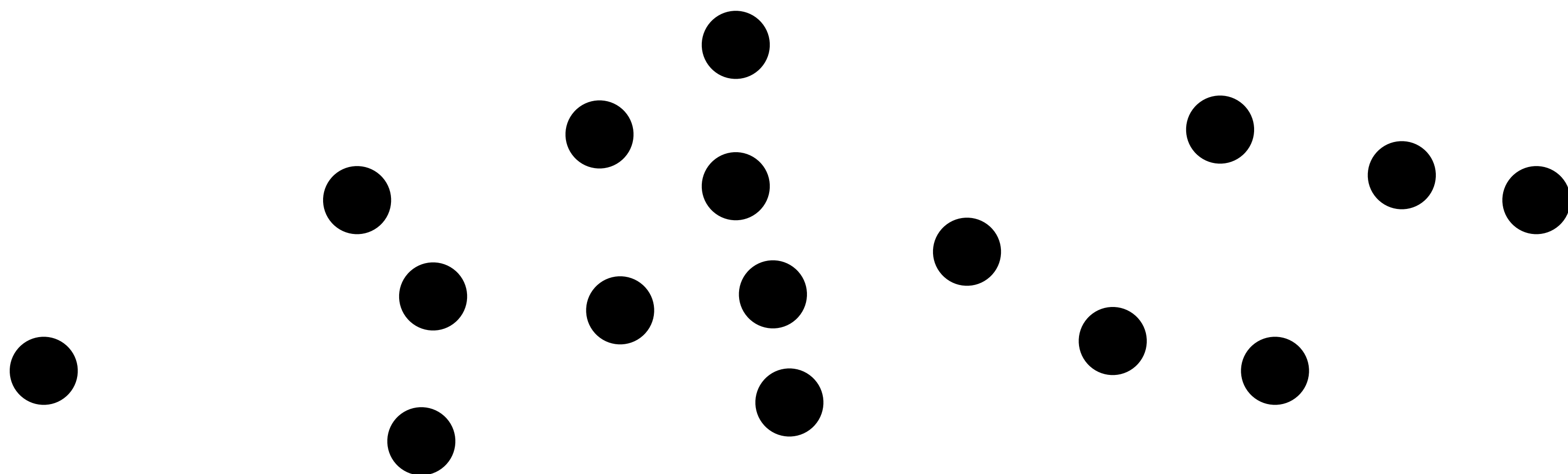
Fundamental harm-enabling capabilities



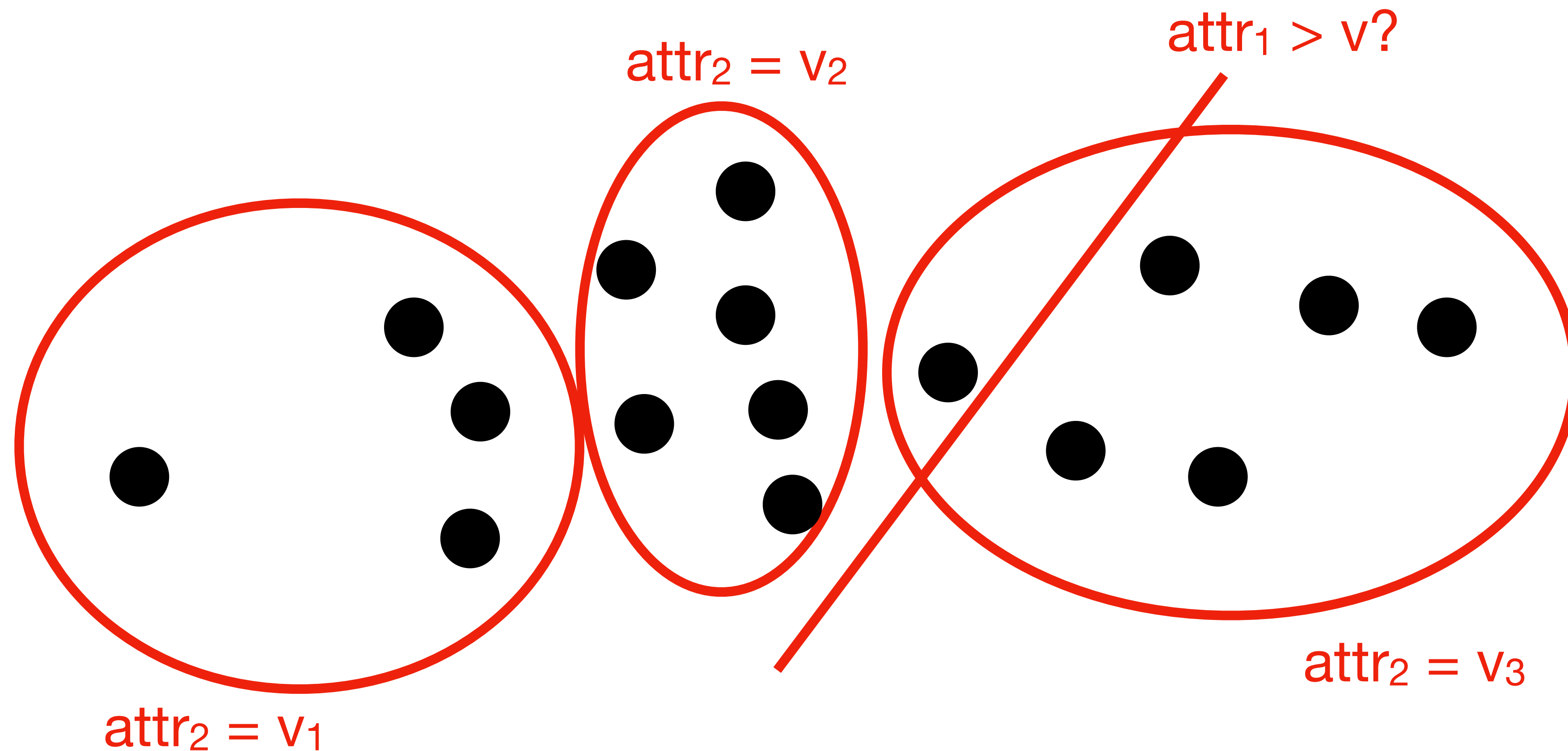
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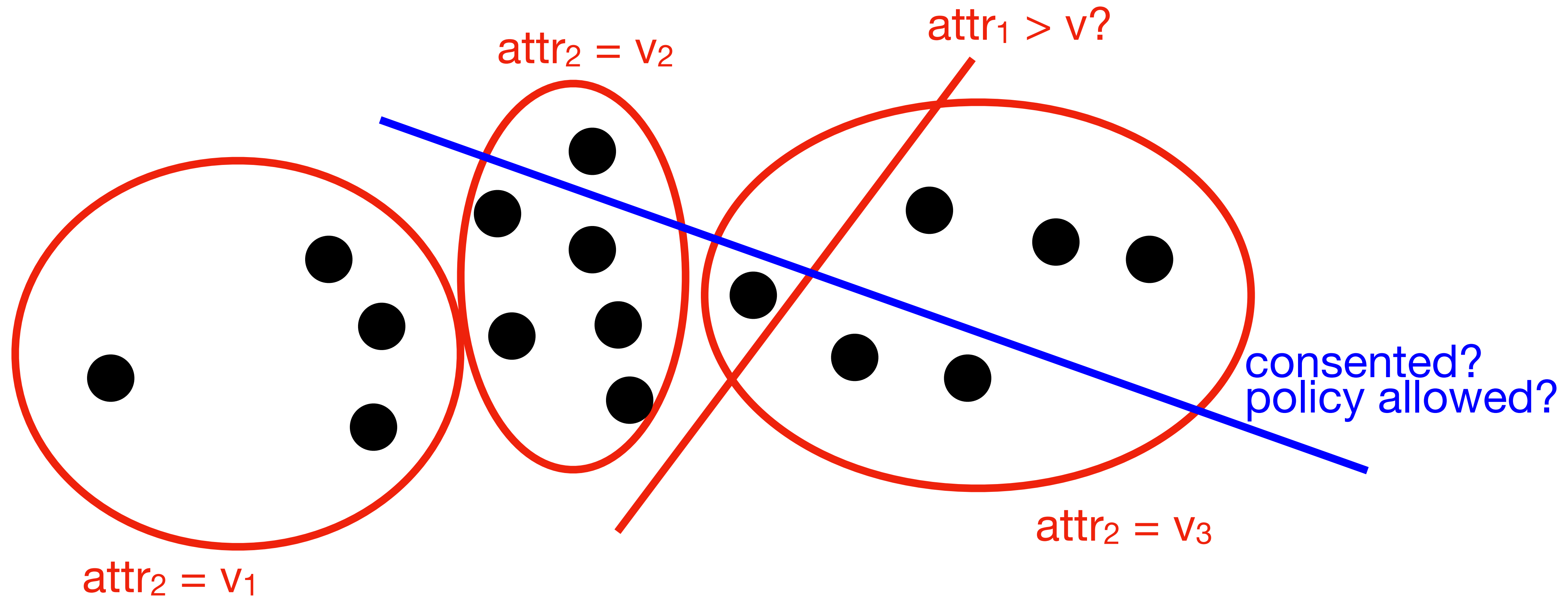
Distinguishing / Tracking



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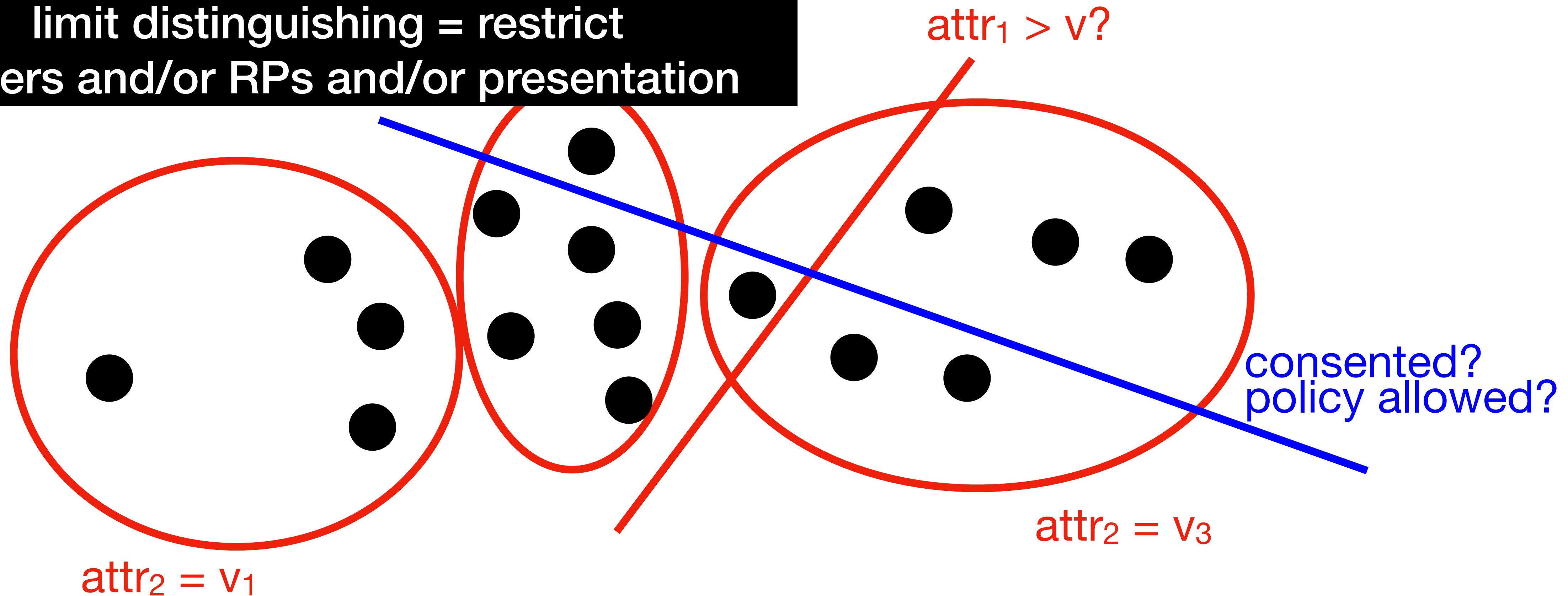


Distinguishing / Tracking



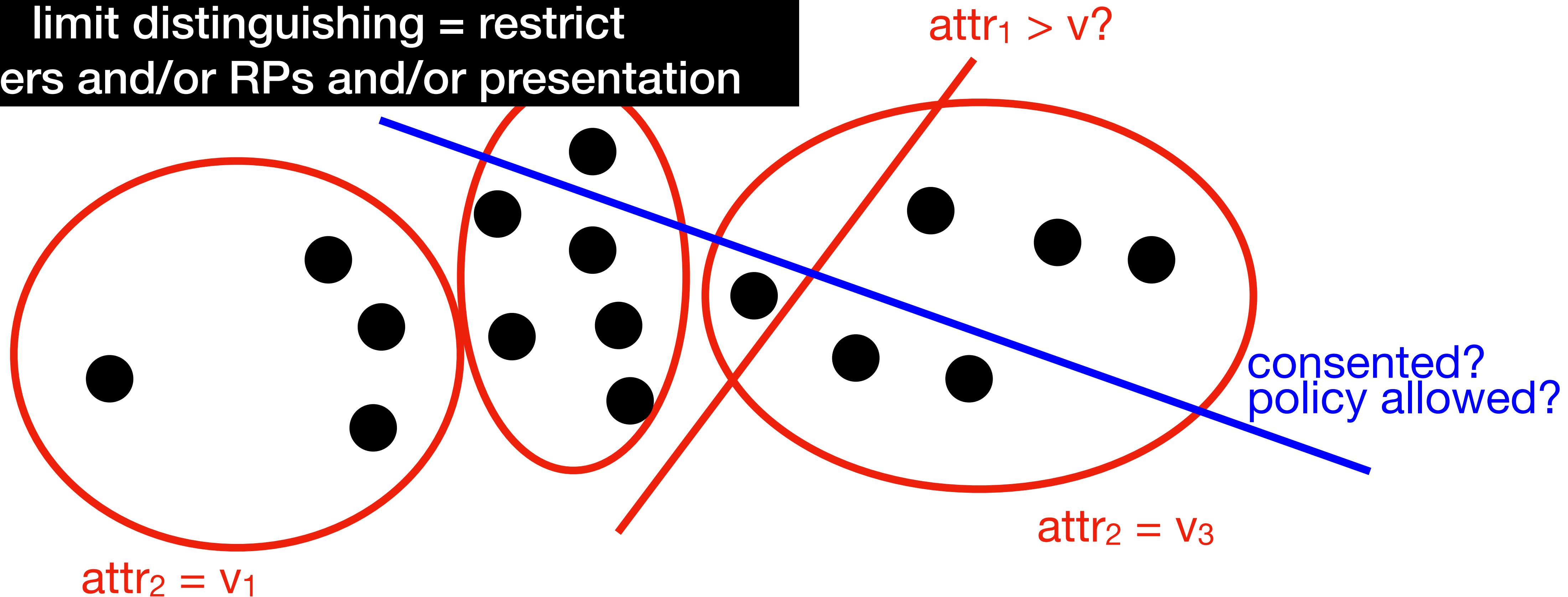
Distinguishing / Tracking

limit distinguishing = restrict
issuers and/or RPs and/or presentation



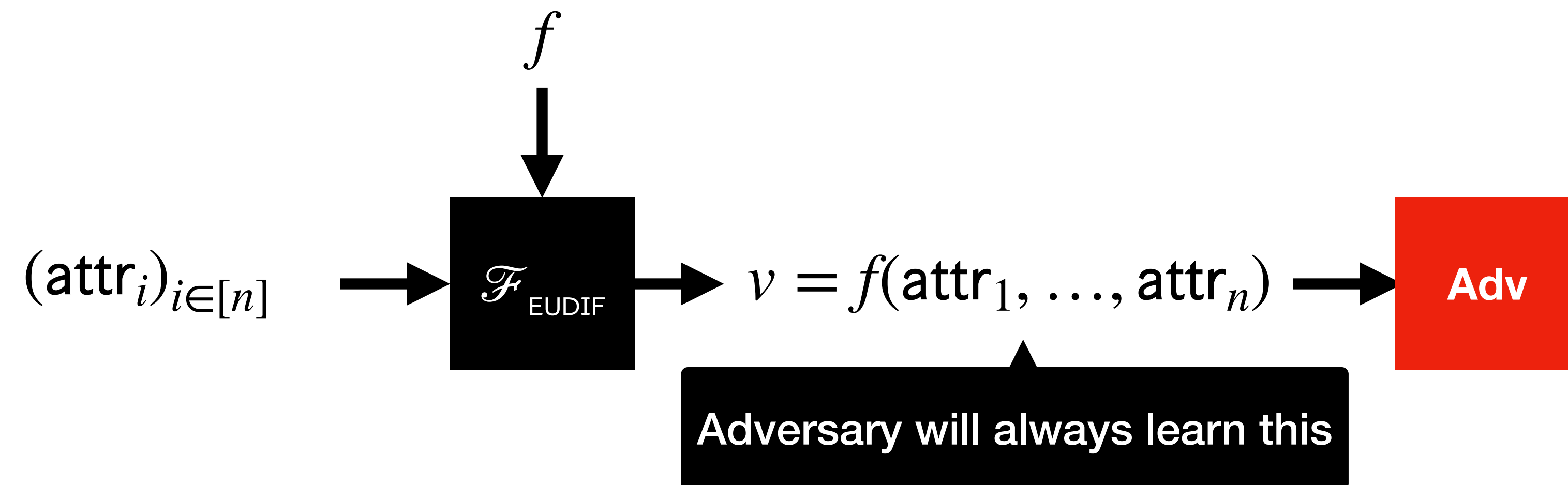
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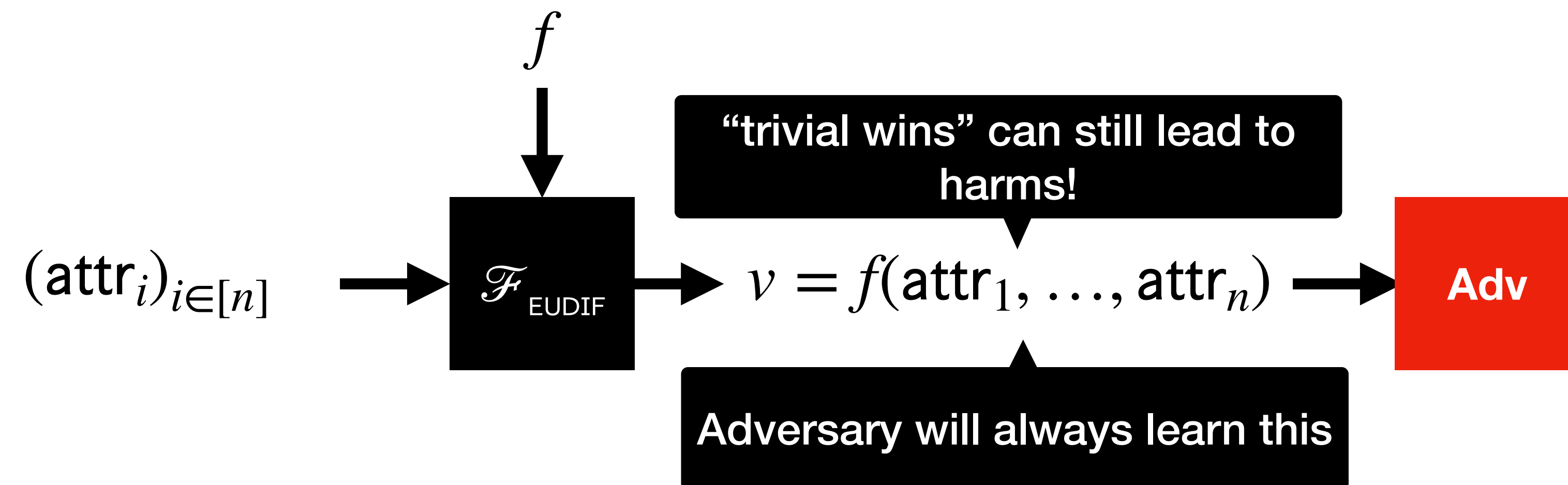


limit trackability = enforce k-anonymity / l-diversity / t-closeness

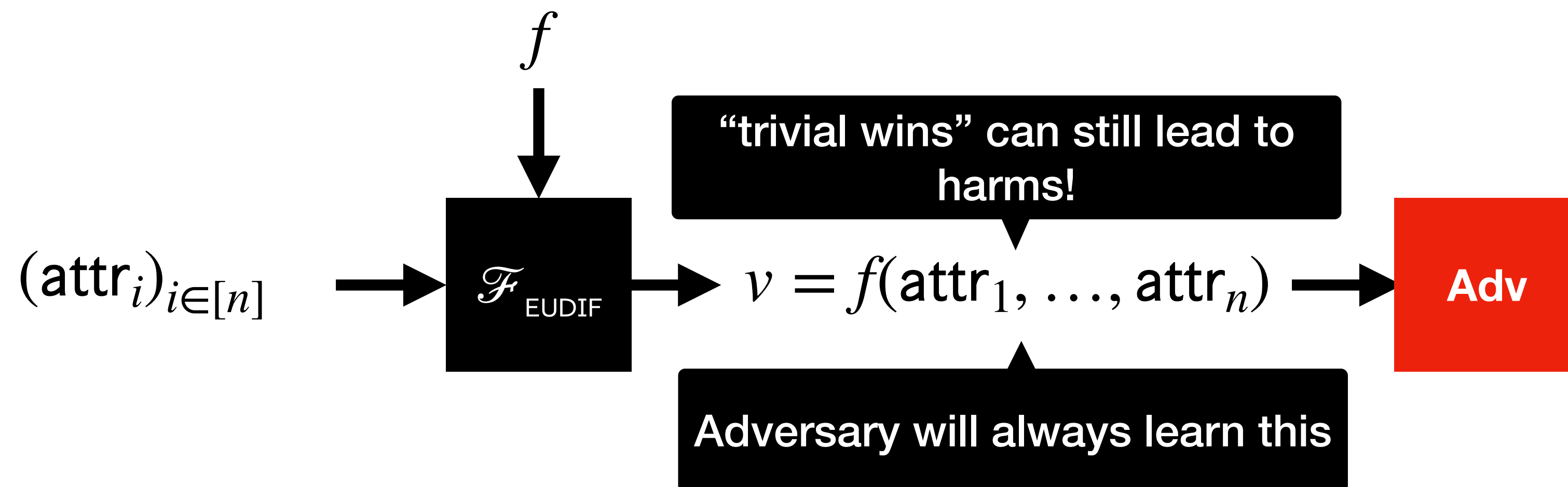
Inference



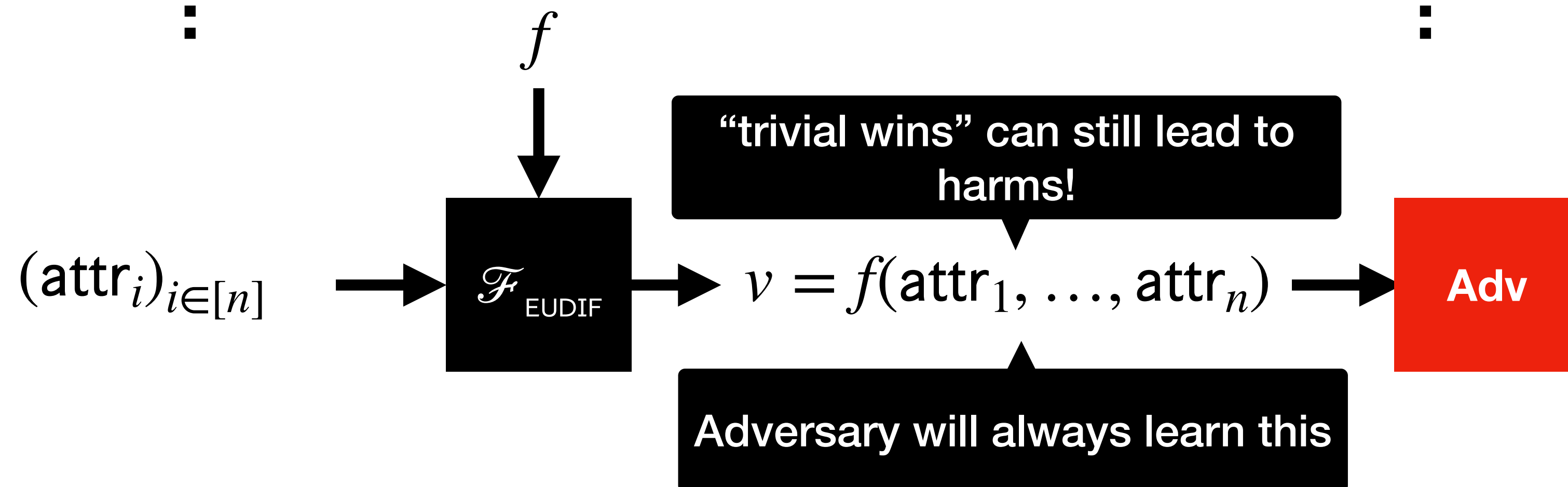
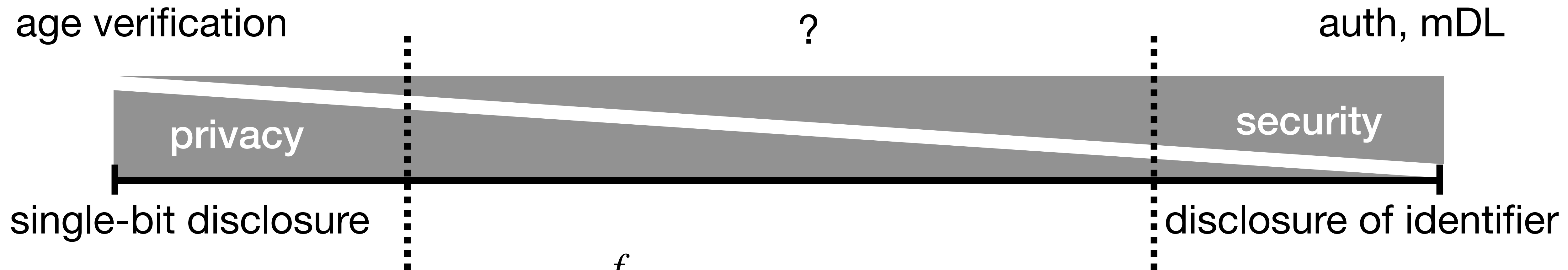
Inference



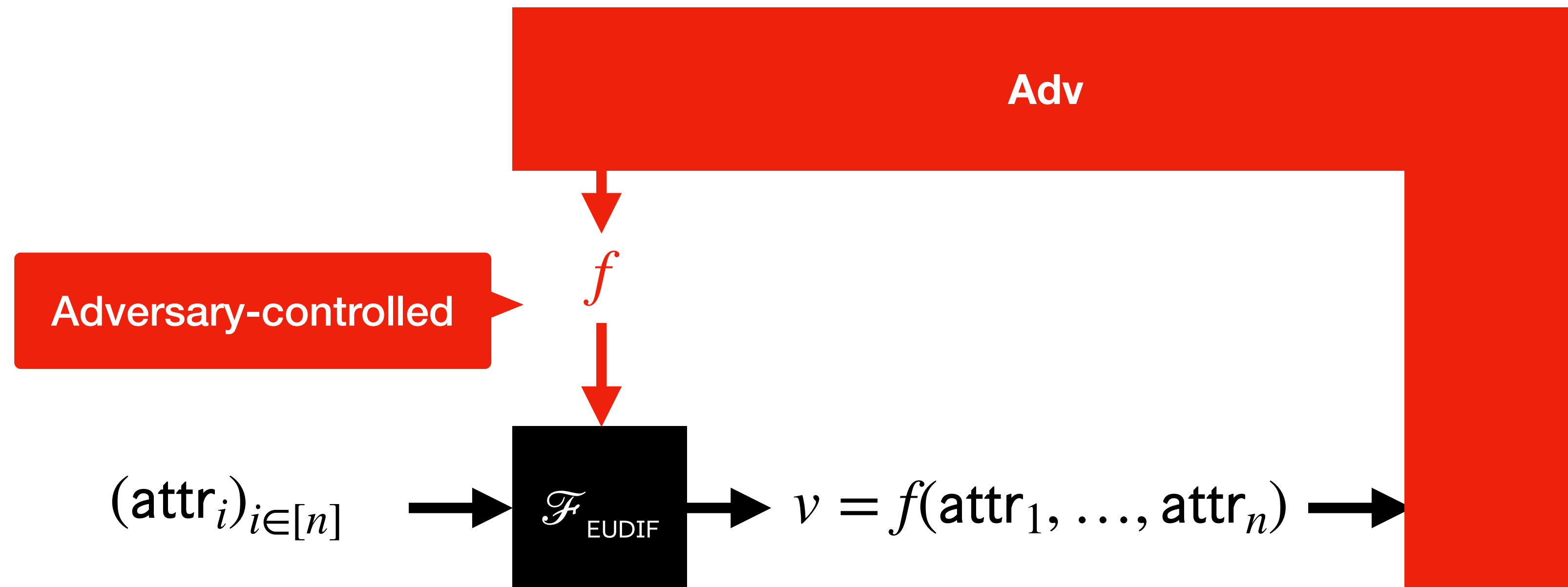
Inference



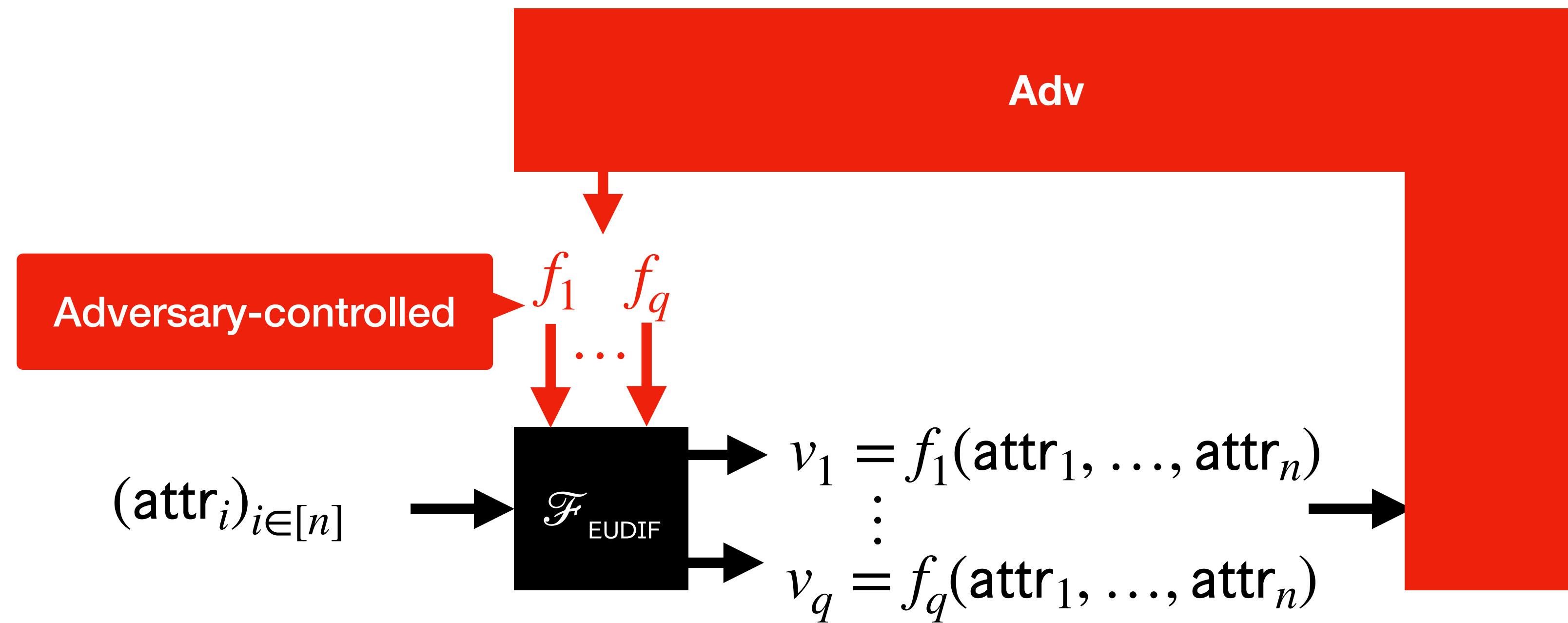
Inference



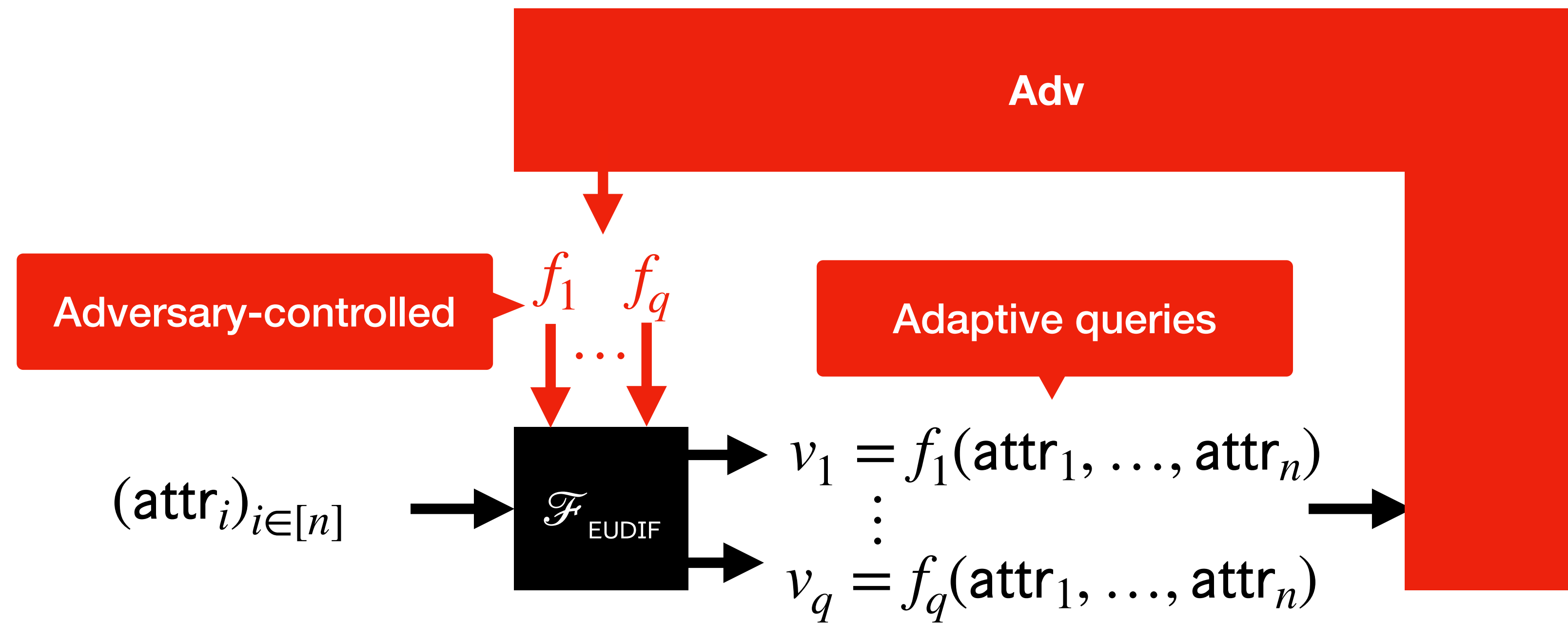
Inference



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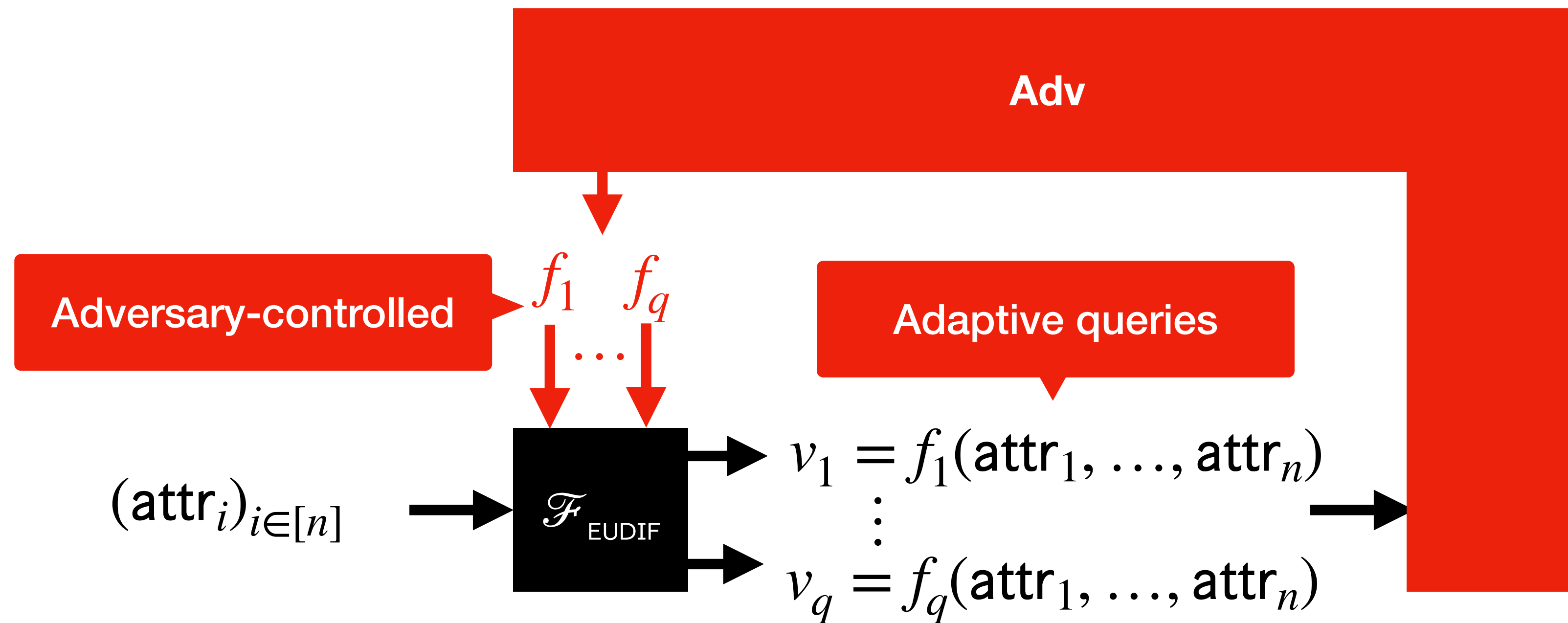


Inference



Inference

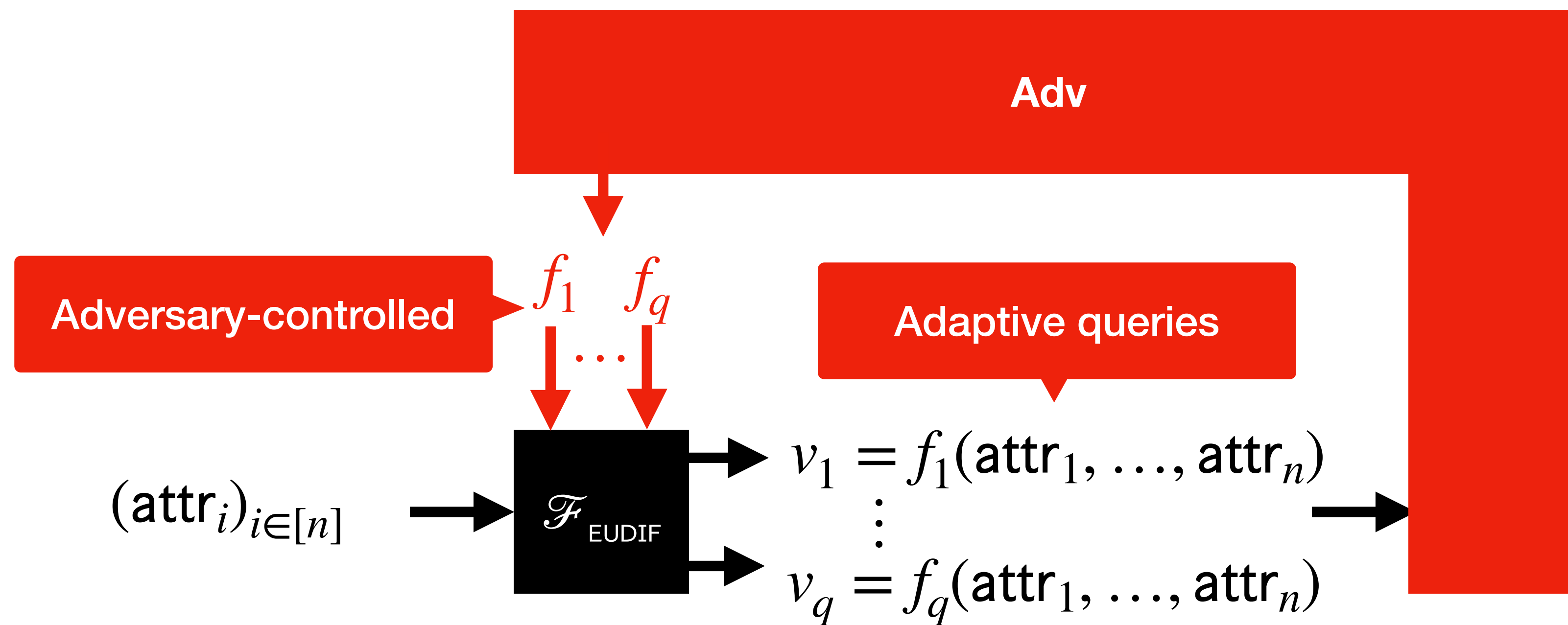
In the EUDIF, adversarial RP can perform arbitrary inference of user's attributes



Inference

In the EUDIF, adversarial RP can perform arbitrary inference of user's attributes

limiting function creep or overidentification = restrict which attributes can be issued/requested



Takeaways

- **PETs are necessary, but not sufficient** to reduce harms from DIFs
- **Properties of PETs can be easily voided by system design;** privacy doesn't compose nicely, and harms arise at the system-level
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Thanks! Questions?

christian.knabenhans@epfl.ch

sveitch@ethz.ch