



To the attention of:

Ms. Anu Talus
Chair
European Data Protection Board

Copy to:

Ms. Isabelle Vereecken
Head of the Secretariat
European Data Protection Board

M. Olivier Micol
Head of Data Protection Unit
EU Commission

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**Upcoming stakeholder event on anonymisation and pseudonymisation following the
CJEU Ruling C-413/23 EDPS v. SRB of 04/09/2025**

Dear Ms. Talus,

The undersigned associations warmly welcome the EDPB's initiative to organise an event to collect stakeholders' input on anonymisation and pseudonymisation in light of the recent judgment of the Court of Justice of the European Union (CJEU) in case C-413/23 EDPS v SRB.

This important initiative provides a valuable opportunity to build on the Court's clarification that the concept of personal data has clear limits as pseudonymised data may, in certain circumstances, effectively prevent the identification of individuals and thus be considered anonymous. This helpful clarification is particularly timely and of fundamental importance across all sectors of the European economy — from technology and digital, artificial intelligence, marketing, media, telecoms, cybersecurity, transport, banking, insurance, video games, automotive and medical research — where the ability to use, share, and protect data responsibly underpins both competitiveness and societal progress.

As the European Union strives to position itself as a leader in artificial intelligence among other innovative technologies, the CJEU judgement opens promising avenues to increase data accessibility and the development of Privacy Enhancing Technologies (PETs), while upholding the fundamental right to data protection.

The Court's judgement could also mark a major step forward in advancing the goals of the EU Data Strategy, which promotes data sharing and data-driven innovation. It aligns with the legal frameworks established by the Data Governance Act and the European Data Act and supports the ambitions of the forthcoming Data Union Strategy.

The EDPB upcoming event is the opportunity to bring to life the recent EDPB Helsinki Statement on "*A fundamental rights approach to innovation and competitiveness*" which aims to enhance the dialogue with stakeholders and to facilitate GDPR compliance. Therefore, to ensure the event achieves tangible results, we strongly recommend the EDPB to adopt a participatory format that would include active involvement of EDPB members to facilitate fair and substantive exchanges with stakeholders. We also suggest inviting a diverse and balanced range of participants, including representatives from both the public and private sectors as well as regulators responsible for related frameworks such as the DGA and the AI Act. Finally, we believe that the discussions would benefit greatly from curated sessions dedicated to the presentation of concrete use cases to explore how pseudonymisation and anonymisation operate in practice and the benefits they can bring.

The event should initiate a collaborative process for developing a readily applicable and EU-wide framework for pseudonymisation and anonymisation, consistent with the Court's contextual and risk-based interpretation of identifiability. In line with the Helsinki commitments, this content should be grounded in operational realities by including practical tools such as checklists or interpretative grids that can provide legal certainty, help organisations of all sizes assess and demonstrate compliance consistently and ultimately innovate more with enhanced trust. Recent initiatives — such as the Office of the Information and Privacy Commissioner of Ontario's "De-identification Guidelines for Structured Data" and the Personal Data Protection Commission of Singapore's "Guide to Basic Anonymisation" — offer useful reference points for developing structured methodologies that combine legal principles with practical implementation guidance.

Finally, we believe that the potential of formal compliance mechanisms such as certification schemes and codes of conduct should be further explored as mechanisms enabling the definition and adoption of uniform pseudonymisation and anonymisation techniques.

We thank you in advance and look forward to engaging in constructive discussions to help the EDPB's ongoing work on these important topics for the future of responsible data-driven innovation.

List of signatories

ACEA (European Automobile Manufacturers' Association): ACEA unites Europe's 16 major car, truck, van and bus makers. ACEA is the voice of the auto industry: a technological world leader and the backbone of the EU economy. Its members keep Europe on the move, providing diverse solutions for moving people and goods from A to B. Together, we are progressing on the road to zero-emission and zero-fatality transport. We are addressing major technology shifts and the changing mobility needs of Europeans.

Connect Europe: Connect Europe is the voice of the leading providers of connectivity networks and services in Europe. Our members are at the forefront of innovation in the telecom and technology ecosystems, connecting over 270 million Europeans with cutting-edge mobile and fixed networks, such as fibre and 5G. They also deliver advanced services, ranging from first-class IT, AI and cybersecurity solutions, to entertainment and content. As the main investors in the industry, our members drive the digital transformation of the Continent, accounting for more than 70% of total telecom sector investment in Europe. Formerly known as ETNO, we stand for an improved policy and regulatory environment that enables citizens and businesses to benefit from digital connectivity and services.

EACA (European Association of Communications Agencies): EACA is the voice of Europe's communications industry, representing over 2,500 organisations in nearly 30 countries and more than 150,000 professionals across advertising, media, digital, branding, and PR. EACA promotes the economic and social value of commercial communications and works closely with EU policymakers and stakeholders to ensure agencies operate in a fair, innovation-friendly, and sustainable business environment. As the leading advocate for the sector, EACA strengthens Europe's creative economy by advancing a regulatory framework that fosters growth, competitiveness, and responsible communication.

EACB (European Association of Co-operative Banks): EACB is the voice of cooperative banks in Europe. It represents, promotes, and defends the common interests of its 28 member institutions in banking as well as cooperative legislation. With 2,400 locally operating banks and 35,150 outlets, cooperative banks are widely established across the European Union and play a vital role in its financial and economic system. They have a longstanding tradition serving their 228 million customers, mainly consumers, SMEs and communities. In Europe, cooperative banks represent 91 million members, providing employment to 747,000 individuals and maintaining an average market share of approximately 20%. Website: www.eacb.coop.

EAIF (The European AI Forum): EAIF brings together Europe's leading AI and Deep Tech innovators, representing over 2,000 entrepreneurs across its member organisations. EAIF connects industry and policymakers to advance AI that aligns with European and democratic values.

EBF (European Banking Federation): EBF is the voice of the European banking sector, comprising 33 national banking associations in Europe that together represent some 3,500 banks – large and small, wholesale and retail, local and international – employing about 2,7 million people. EBF's associate membership includes the national banking associations of 10 additional countries that cover the whole of Europe and beyond. The EBF is committed to a thriving European economy that is underpinned by a stable, secure, innovative and inclusive financial ecosystem, where financing is available to fund the future of citizens, businesses and innovators everywhere. Website: www.ebf.eu

egta (the international trade body of multiplatform TV and audio businesses): With more than 180 members in over 40 markets, egta's mission is to contribute to the commercial sustainability of the media industry. We enable our members to flourish as they connect brands with audiences. Through our unique network of experts, we foster collaboration and engage with policy makers. We drive the industry forward through cooperation, benchmarking and alignment on standards. egta is a knowledge-sharing and innovation hub for its members and the broader industry.

EPC (European Publishers Council): EPC is a high-level group of Chairmen and CEOs of Europe's leading media groups representing companies which are active in news media, television, radio, digital market places, journals, eLearning, databases and books. We have been communicating with Europe's legislators since 1991 on issues that affect the health and viability of journalistically-driven media and publishing companies in the European Union which uphold the freedom of expression, media diversity, and democratic debate.

EUTA (European Tech Alliance) : EUTA represents leading European tech companies that provide innovative products and services to more than one billion users globally. Our 36 EUTA member companies stem from 16 European countries, and are operating in Europe and beyond. As companies born and bred in Europe, for whom the EU is a crucial market, we have a deep commitment to European citizens and values. With the right conditions, our companies can strengthen Europe's resilience and technological autonomy, protect and empower users online, and promote Europe's values of transparency, rule of law and innovation to the rest of the world.

EUtraveltech: eu travel tech represents the interests of travel technology companies. eu travel tech uses its position at the centre of the travel and tourism sector to promote a consumer-driven, innovative and competitive industry that is transparent and sustainable. Our membership spans Global Distribution Systems (GDSs), Online Travel Agencies (OTA), Travel Management Companies in business travel (TMCs) and metasearch sites. eu travel tech's Board Members include Airbnb, Booking.com, eDreams ODIGEO, Expedia Group, Etraveli Group, and Skyscanner. Members include Amadeus, American Express GBT, Awaze, Dohop, GetYourGuide, Idealo, LastMinute, Omio, Sabre, Trainline, Travelport, TripAdvisor, and Vola.

FEDMA (Federation of European Data and Marketing): The Federation of European Data and Marketing (FEDMA) represents the operational heart of responsible, data-driven marketing in Europe. We bring the voice of marketing service providers, national Data and Marketing Associations (DMAs), and SMEs, those who implement campaigns and manage data on the ground. Our focus is making regulation not only ambitious, but also workable, ensuring that responsible marketing can thrive in a privacy-first environment.

GSMA: The GSMA is a global organisation unifying the mobile ecosystem to discover, develop and deliver innovation foundational to positive business environments and societal change. Our vision is to unlock the full power of connectivity so that people, industry, and society thrive. Representing mobile operators and organisations across the mobile ecosystem and adjacent industries, the GSMA delivers for its members across three broad pillars: Connectivity for Good, Industry Services and Solutions, and Outreach. This activity includes advancing policy, tackling today's biggest societal challenges, underpinning the technology and interoperability that make mobile work, and providing the world's largest platform to convene the mobile ecosystem at the MWC and M360 series of events.

IAB Europe (Interactive Advertising Bureau): IAB Europe is the European-level association for the digital marketing and advertising ecosystem. Through its membership of national IABs and media, technology and marketing companies, its mission is to lead political representation and promote industry collaboration to deliver frameworks, standards and industry programmes that enable business to thrive in the European market

IATA (The International Air Transport Association): IATA is the trade association for the world's airlines, representing some 350 members which together account for over 80% of global air traffic. IATA supports many areas of aviation activity and helps to formulate industry policy on critical aviation issues.

Insurance Europe: Insurance Europe is the European insurance and reinsurance federation. Through its 39 member bodies — the national insurance associations — it represents insurance and reinsurance undertakings active in Europe and advocates for policies and conditions that support the sector in delivering value to individuals, businesses, and the broader economy.

Video Games Europe: Since 1998, Video Games Europe has ensured that the voice of a responsible video games ecosystem is heard and understood. Its mission is to support and celebrate the sector's creative and economic potential and to ensure that players around the world enjoy the benefits of great video game playing experiences. Europe's video games sector is worth €26.8bn and accounts for 116,000 jobs. 54% of Europeans are video game players. We publish a yearly Key Facts report with the latest data on Europe's video games sector.