

Spanish Data Protection Authority

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dit@aepd.es**Response to ARF Discussion topics:****Topic X “Relying Party Registration”**

The Relying Party (RP) registration requires RPs to provide information necessary for authentication, their contact details, and the intended use of the European Digital Identity Wallets, including the specific data they will request from users. The RPAC (wallet Relying Party Access Certificate) authenticates who the Relying Party is, while the RPRC (wallet Relying Party Registration Certificate) specifies what data that authenticated RP is entitled to request for a particular registered purpose. Both certificates are crucial for establishing trust and ensuring transparency and user control within the European Digital Identity Wallet framework, contributing to data protection by limiting data requests to registered intended uses. Crucially, RPs are explicitly prohibited from requesting any data beyond what is indicated in their registration. This is a key mechanism for enforcing data minimisation and purpose limitation.

For this to be entirely true, it is required further clarification within the ARF on:

- Registration updates and lifecycle (new data, new use cases, certificates revocation).
- Multi-registration (per use case, per MS) and cross-border registration.
- Post-registration analysis and audit (is the RP complying with its registration?) and Data Protection Authorities role.

We have two additional concerns regarding GDPR compliance:

1. RP contact details that must be registered to ensure the exercise of data subject rights.
2. Compliance of principles such as lawfulness, fairness, transparency, storage limitation or accountability and of requirements such as those related to data subject rights when using an Intermediary RP. This new role introduces privacy threats that must be carefully analysed and mitigated, among other measures, with this registration process. This concern is transversal to several ARF discussion topics, given that this new role raises many doubts/unknowns that we would like to see resolved as soon as possible.