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**Brussels, 04 November 2025**

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**WK 14021/2025 INIT**

**LIMITE**

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## **WORKING DOCUMENT**

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**From:** Presidency  
**To:** Working Party on Financial Services and the Banking Union (Digital Euro Package)  
Financial Services Attachés

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**Subject:** Digital euro - Presidency discussion note on privacy, WP 11.04.2025  
- Replies by 20 MS

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WK 14021/2025 INIT

**LIMITE**

**EN**

**Digital euro - Presidency discussion note on privacy (WK 3948/25)**

**From: AT, BE, BG, CZ, DE, EE, EL, ES, FI, FR, HR, IE, IT, LT, LU, NL, PT, RO, SI, SK**

Deadline: *11 April 2025*

Updated: 02/05/2025 11:20

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**Drafting suggestions:** you may use 'track changes' or formatting (for example bold-underline for additions and ~~strike-through~~ for deletions, where necessary, in a different colour).

To make it feasible to consolidate all contributions, the structure of the table must not be changed, so **no rows can be added or deleted**.

New provisions may only be added in any of the '**existing cells**'.

**Name of document:** please add the **two initials** of your delegation's country followed by a space (to the MS Word document name), followed by any optional text, for example, for Austria: **AT comments on ... .docx**

Thank you for your cooperation!

<b>Presidency discussion note on privacy (WK 3948/25)</b>	<b>MS comments</b>
2. ECB technical seminar: follow-up	NL <b>(MS comments):</b> NL <b>general comment:</b> In general, we believe that the developments are moving in the right direction as high privacy ambitions are set. Much to the wish we had previously expressed, design choices are being made to advance data minimization and segregation, as far as technically possible. To us, having an innovative payment option with a high level of privacy is the best way to stimulate uptake of the digital euro. We appreciate the efforts of the PCY and ECB in this regard.

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	<p>We have confidence in the proposals for alias lookup and Secure Exchange of Payment Information. We are however somewhat concerned about how these features – and many others – add to the complexity of making digital euro payments for PSPs, although we also see the necessity. We see a continuing balancing act between affordability/feasibility for PSP’s on the one hand and the high(est) level of privacy on the other hand.</p> <p>To make further progress on this file, we should have a discussion on the offline use of the digital euro. In light of the French non-paper on privacy, the ECB proposed two valuable two basic functionalities: being able to fund the offline digital euro account automatically up until a certain limit, and automatic offline proximity-payments. We look forward to further discussing these proposals and any relevant drafting suggestions in this regard.</p> <p>We would like to make the general comment that we worry about the codification of the account-based nature of digital euro payments, for example in the DEAN. This would unnecessarily create the illusion that consumers would have an account at the ECB. Additionally, if we would ever want to move to tokenization, using the phrase ‘account’ would clash</p>

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	<p>with this and our efforts for a future proof regulation. We are open to suggestions, but we could for example imagine using the word ‘access’ instead, so that the acronym DEAN can still be used. We could also support a proposal made by our German colleagues to use Digital Euro Vault Identifier.</p> <p>Finally, we are wondering whether the information about the data that is being used by the different entities in annex 3, 4 and 5 is still correct, or whether this needs to be updated? For example, while the obligation to provide alias look-up services should be part of Annex II, Annex III on payment processing by PSPs could include a new article (4): “<b><u>For the purpose of point (g), article 34(1), processing shall be at the request of users and shall be limited to: (i) the user identifier; (ii) the (proxy) alias.</u></b></p> <p>We could imagine similar changes to <b><u>Annex V</u></b>, which currently does not allow PoSS the ability to include other data than for the purposes of prevention and detection of fraud. It would be most useful to revisit the annexes when the privacy model is known fully, e.g. after the second</p>

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	<p>technical seminar and any follow-up discussions on offline privacy following the French non-paper.</p>
<p>2.2. The user alias</p>	
<p><i>Q1. Do Member States agree with the Spanish Presidency's drafting suggestion for Article 2(28), i.e. to include the possibility for digital euro users to register additional proxy aliases in addition to a compulsory alias?</i></p>	<p>AT <b>(MS comments):</b> Yes, we agree. The definition in Art 2 (28) also refers to NCBs. Following the input from the ECB Technical Seminar on 6 March 2025, we wonder to what extent NCBs are included in the creation of a user alias or whether this reference shall be deleted?</p> <p>BE <b>(MS comments):</b> Yes, we agree.</p> <p>BG <b>(MS comments):</b> To achieve a better clarity, we support the inclusion in the DER the possibility for DE users to register additional proxy aliases.</p>

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	<p>The change poses additional questions such as – whether there would be some additional regulation of the service - a set of rules, practices and standards (for example how many aliases could be defined for a DEAN, how different types of aliases would be interconnected, mutual accounts and etc) .</p> <p>CZ (MS comments):</p> <p><i>We are not against this approach. In our opinion it seems to be reasonable and consumer friendly solution. However, it is crucial to ensure a high level of privacy for digital euro users and Eurosystem should not be able to identify any personal data of the users as is the case for cash transactions.</i></p> <p>DE (MS comments):</p> <p>General remarks:</p> <ul style="list-style-type: none"> <li>• We wish to thank the ECB for the technical seminar which provided valuable insights into the current technical developments, in particular regarding the issue of data segregation and data processing.</li> </ul>

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	<ul style="list-style-type: none"> <li>• The technical works carried out by the ECB, generally, seem to go in the right direction. The concept how to segregate data and how to ensure that the ECB may not identify individual users, appears reasonable. We wish to make three remarks: <ul style="list-style-type: none"> <li>○ First, the concept involves a number of (private) Providers of Support Services (PoSS). We are <b>wondering who would be bearing the costs of the PoSS?</b> Would their services be covered also from the seignorage income?</li> <li>○ Second, a thorough <b>scrutiny check from the European Data Protection Supervisor</b>, as envisaged in Article 5 (2), seems warranted – both regarding the technical set-up but also regarding legal questions relating to data protection law. In particular, we are wondering about the legal feasibility of appointing the PoSS as data controllers in Article 36.</li> <li>○ Third, we are wondering about the <b>necessity of regular external audits</b>, which might help to strengthen the trust in the system.</li> </ul> </li> </ul>

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	<ul style="list-style-type: none"> <li>• Before answering the PCY’s questions in more detail, we would like to make some more general remarks concerning the issue of privacy. Unfortunately, these issues have not been addressed yet.</li> <li>• First, we continue to wonder about the <b>technical infrastructure of the DESP</b>. Would this be a <b>token-based or an account-based model</b>? At least, would the offline version be token-based? Where do the works stand on this issue?             <ul style="list-style-type: none"> <li>○ In this context, if there is a rising concern that <b>stablecoins</b> would gain more relevance in the EU, we understand that this would be related in particular to B2B transactions, where businesses could use their DLT infrastructures and revert to stablecoins for their payment processes. Hence, we believe that the <b>development of B2B use cases remains of high importance</b>. We hear from stakeholders that a token-based model for a digital euro would be preferable for these use cases.</li> </ul> </li> <li>• Second, we think <b>privacy also from a user and communication perspective</b>. The <b>offline version</b> of the digital euro remains of vital importance. However, significant amendments are still necessary in this respect:</li> </ul>

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	<ul style="list-style-type: none"> <li>○ The ECB had proposed an <b>‘offline by default’</b> provision as well as an <b>automatic funding functionality for the offline version</b>. We would welcome drafting suggestions to this effect.</li> <li>○ We ask for a discussion regarding the <b>setting of holding and transaction limits for the offline version</b>. We are convinced that the transaction limit should be set by the co-legislators at <b>level 1</b>.</li> <li>○ We wonder about the exact <b>functioning of the offline version</b>: Could users <b>re-spend offline digital euros</b> that they have received without going online in the meantime? Would the same be possible for businesses?</li> <li>○ From a privacy perspective, it must be clarified what data becomes visible during the <b>reconciliation process</b>.</li> <li>● Third, we believe it would strengthen the digital euro, if the entire <b>technical framework</b> would undergo an <b>external scrutiny check before going live</b>. This would significantly enhance users trust in the digital euro. In addition, it would mitigate reputational risks associated with a (technical) failure of the digital euro at the beginning.</li> </ul>

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	<p style="text-align: center; opacity: 0.3; font-size: 48px; transform: rotate(-45deg); pointer-events: none;">PUBLIC</p> <ul style="list-style-type: none"> <li>• Fourth, we recognise that the EU Directive on Administrative Cooperation in Direct Taxation (<b>DAC8</b>) extends reporting obligations also to CBDC. This might include the digital euro. In particular with regard to the offline version, we are wondering which data would be available to the PSPs (and which could potentially be passed on to investigation authorities)?</li> <li>• Fifth, in its current wording, <b>Article 37 (2)</b> on the offline digital euro states that '<i>[t]ransaction data shall not be retained by payment service providers or by the European central banks and the national central banks.</i>' Does that mean that the data does not exist and thus it could never be handed over to investigation authorities? Or does the phrase 'shall not retain' rather mean that the data exists but shall just not be stored? We would welcome clarifications on these issues.</li> </ul> <p>Answer to Q1:</p> <ul style="list-style-type: none"> <li>• <b>We support the possibility for digital euro users to register additional proxy aliases.</b></li> </ul>

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	<ul style="list-style-type: none"><li>• This could become a compelling feature for users which could enhance the ease of use.</li><li>• Regarding the drafting, we are not sure whether the introduction of additional proxy aliases by way of an addition to Article 2(28) DER is adequate given that this paragraph defines a user alias as an identifier that protects the user’s identity which might not be the case for the proxy alias.</li></ul> <p>EE (MS comments): EE: We agree.</p> <p>EL (MS comments): EL: Yes, we agree with the Spanish Presidency’s drafting suggestion for Article 2(28) to include the possibility for digital euro users to register additional proxy aliases in addition to a compulsory alias.</p> <p>ES (MS comments): In general, we agree. However,</p>

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	<ul style="list-style-type: none"><li>- We would just ask for coherence in art. 2(28) and article 22(3) depending on who creates the user alias. Is it the ECB and the NCB or just the ECB? Depending on the answer, we would write either both or only the ECB in both articles.</li><li>- Regarding the additional proxy aliases, we are very supportive of the possibility to use them, however, if we understand correctly, they are not created by the ECB (and NCBs), so this should be amended in the wording.</li></ul> <p>FI <b>(MS comments):</b> Yes</p> <p>FR <b>(MS comments):</b> We agree.</p> <p>HR <b>(MS comments):</b> We agree with ES PRES drafting suggestion for Article 2(28), i.e. to include the possibility for digital euro users to register additional proxy</p>

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	<p>aliases in addition to a compulsory alias, but we find that this possibility could be prescribed in the Rulebook and not in the Proposal.</p> <p>According to ES PRES drafting suggestions in Article 2(28) user alias is created by the European Central Bank and national central banks upon the request of the PSP. However, according to the drafting suggestions of the PL PRES in the Article 22 (3) digital euro payment account shall have a unique DEAN created only by the ECB and not also by national central banks.</p> <p>During the ECB technical seminar on 6 March 2025 ECB clarified that user can ask its PSP to register the proxy alias next to the DEAN and that Eurosystem central banks will operate the DEAN directory and Alias lookup service will provide Providers of Support services (PoSS).</p> <p>We would appreciate clarification of the ECB if DEAN can be created also by the national central banks and the Article 22(3) should be complemented or national central banks should not be prescribed in Article 2(28) with the definition of "user alias".</p> <p>IE  <span style="background-color: yellow;">(MS comments):</span>                      IE supports the ES proposal of allowing digital euro users to register additional proxy aliases to one account.</p>

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	<p style="text-align: center; font-size: 2em; opacity: 0.2; transform: rotate(-30deg);">PUBLIC</p> <p>IT (MS comments):</p> <p>We support the proposal to include the possibility for digital euro users to register additional proxy aliases.</p> <p>On the wording of Article 2(28), we note that if we read together the first part of the definition with the last sentence (“<i>including a compulsory alias (the digital euro payment account number) and, if requested by a digital euro user, additional proxy aliases that can also be linked to the account</i>”) it may entail that the ECB and the NCBs are requested to create not only the digital euro payment account number, but also the additional optional user aliases. This misunderstanding should be avoided since additional proxy aliases should only be registered by the PSPs, considering that they may include personal data (e.g. the telephone number) and therefore allow to identify the digital euro user.</p> <p>More generally, we believe that DEAN should not be identified as a (compulsory) alias. Only email, telephone number etc. are, technically speaking an alias. Therefore, we propose below an amendment to the definition of “user alias” that takes into account the difference between alias</p>

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	<p>and DEAN. If the proposal is accepted, other recitals and articles as proposed by the Presidency should also be amended.</p> <p><i>Art. 2(28): “User’s alias means an account-specific pseudonymous identifier (e.g. phone number etc.) used to protect the user’s identity (i.e. an identifiable natural or legal person) when processing digital euro payment transactions. This is registered by the payment service provider and linked to the digital euro account upon request of the user”</i></p> <p>Alternatively, as a second best, if the Presidency wishes to maintain the same approach as in the note discussed during the last CWP, we propose the following wording:</p> <p><i>Art.2(28): “User’s alias means an account-specific pseudonymous identifier used to protect the user’s identity (i.e. an identifiable natural or legal person) when processing digital euro payment transactions. This includes a compulsory alias, i.e. the digital euro payment account number, which is mandatorily assigned when creating the digital euro account and an additional proxy alias (e.g. phone number etc.) that can be registered by the payment service provider and linked to the digital euro account upon request of the user.”</i></p>

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	<p>LT <b>(MS comments):</b></p> <p>As general principle, we are not in favour of including technical implementation details or design specifications within the regulation, as this would run counter to the principle of technological neutrality, which is essential to ensuring a future-proof framework. The responsibility for technical implementation lies with the ECB and all such details should be set out in the Digital Euro Rulebook.</p> <p>We do not agree with the proposed new recitals regarding:</p> <ul style="list-style-type: none"><li>(1) Justification digital euro payments account number infrastructure, and</li><li>(2) Justification proxy alias infrastructure.</li></ul> <p>We can agree with the proposed changes to the definition of ‘user alias’, provided that they do not conflict with the objective of ensuring a future-proof regulatory framework.</p> <p>We respectfully suggest that the proposed new Art 22 (3a) provision would be more appropriately placed in the Digital Euro Rulebook, rather than in the regulation itself.</p> <p>LU <b>(MS comments):</b></p> <p>LU: yes, we agree</p>

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	<p>NL  <b>(MS comments):</b>  <b>NL comment:</b> Yes, we agree with the drafting suggestions. We believe this will leave room for innovation in the future.</p> <p>PT  <b>(MS comments):</b>                      We believe that the definition of “user alias” should specify that it refers to a “payment account-specific pseudonymous identifier”. Moreover, we have doubts about considering the DEAN an alias, as it is the “<i>initial</i>”/ “original” account number to which other non-compulsory / voluntary aliases can be linked. Besides this technical precision, we agree with introducing in the Regulation a clarification regarding the voluntary nature of proxy aliases. Furthermore, we consider the reference to “national central banks” as creators of compulsory “user alias” to be misleading, since we are of the view that such function should be an ECB exclusive.</p> <p>RO  <b>(MS comments):</b>                      We agree with the proposed amendments of the Spanish Presidency to art. 2 (28).</p> <p>SI</p>

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	<p>(MS comments): Yes, we agree.</p> <p>SK (MS comments): We support the possibility of the alias registration.</p>
<p><i>Q2. Do Member States agree with the proposed clarifications in the Regulation as regards the DEAN directory and the alias look-up?</i></p>	<p>AT (MS comments): Article 22 (3) should define when exactly the DEAN is created by the ECB, e.g. “...number created by the ECB upon PSP's request”. Further, we agree to replace the misleading term “Digital Euro Payment Account Number” (DEAN), e.g. by a “Digital Euro Payment Number” (DEN).</p> <p>In our view, the new Art. 22 (3a) is not consistent with the proposed recitals (and the information from the ECB technical WS), which require that ECB or NCBs have no access to proxy aliases and a PoSS will be used instead. If the outsourcing of proxy aliases to a PoSS is only optional, pseudonymization could be torpedoed. We therefore recommend the new provision on Article 22(3a): “[...] The ECB <del>may</del> shall delegate the task of facilitating the use of proxy aliases to a support service provider that</p>

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	<p>prevents the ECB from accessing such user alias data.” This could imply a change of Art 36 (1) as well: “Where the European Central Bank shall confer tasks referred to in Article 22 or decides to confer tasks referred to in Article 27 and 32 upon providers of support services [...]”</p> <p>Art 36 (4) shall specify that not only the providers of support services but also the ECB and national central banks shall not be able to identify directly individual digital euro users: “The European Central Bank, national central banks and providers of support services shall take appropriate technical and organisational measures including state-of-the-art security and privacy-preserving measures to ensure that the European Central Bank, national central banks and providers of support services cannot directly identify individual digital euro users. [...]”</p> <p>BE (MS comments): We agree in principle.</p> <p>CZ (MS comments): <i>We are flexible regarding this issue.</i></p> <p>DE</p>

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	<p>(MS comments):</p> <ul style="list-style-type: none"> <li>• Regarding the DEAN, we would like to reiterate the comments we have made several times in the past (recently regarding the issue of switching):</li> <li>• The <b>term DEAN</b> as well as references to digital euro ‘accounts’ or even digital euro payment accounts appear <b>misleading</b> to us. There is a risk that, from <b>a user perspective, the false impression</b> would be created that individual users would have an <b>account with the ECB</b>. If such an ‘account’ – including an DEAccountNumber – would then be accessed through an ECB front end app, we are deeply concerned that this false impression would be aggravated in users’ minds. Not only from a legal perspective but also from a communication perspective, this false impression must be avoided.</li> <li>• Therefore, we urge to remove any language from the proposal that creates the impression that individual users could have accounts at the ECB. This includes the reference to a ‘DEAN’ which we reject.</li> <li>• That said, we do not generally oppose the concept of a “user alias” – we just don’t think it should be linked to or named after the concept of “account”. Instead of the DEAN, we consider it more</li> </ul>

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	<p>accurate to refer to it as the “<i>digital euro vault identifier</i>” (DEVI, that is maintained when switching).</p> <ul style="list-style-type: none"> <li>• The same concerns also apply to Article 2 (28): here, the compulsory alias should not be referred to as a “digital euro payment account number”, but instead as the “digital euro vault identifier”.</li> <li>• Finally, we have argued repeatedly to refrain from using the term ‘account’ but rather using the term ‘<b>wallet</b>’ instead.</li> <li>• This is not just playing around with words, but, in our understanding, the correct terminology has significant impact on the public perception of the digital euro.</li> <li>• In addition, we have some questions and remarks regarding the concept of a DEAN: <ul style="list-style-type: none"> <li>○ In principle, we can <b>support the idea of a DEAN directory</b>.</li> <li>○ In our understanding, the DEAN would be linked to the digital euro holdings recorded in the DESP and not to the user. Is that correct? So that each digital euro holding would be assigned to one individual DEAN?</li> </ul> </li> </ul>

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	<ul style="list-style-type: none"><li>○ In the PCY Note it is stated that ‘PSPs can assign a mandatory and unique DEAN to each user and for each account they provide’. Does this imply that a user could have multiple digital euro holdings identified by a multitude of DEANs?</li><li>○ If that were correct, in the new Recital it would have to be clarified that: ‘<i>To ensure an accurate and secure digital euro payment execution, each digital euro user <b>holding</b> should be associated to a digital euro payment account number.</i>’</li><li>● We are asking these questions bearing in mind that there might be potential to reduce the overall complexity of the system.</li><li>● Finally, regarding the wording of Article 22, we are wondering whether the legal basis for creating and maintaining the DEAN directory is sufficiently clear. Currently, Article 22 (3) only sets out that the ECB may create DEANs. However, there is no direct mentioning that the ECB should entertain such a directory and to what effect. Therefore, it is proposed to insert the word ‘facilitate’</li></ul>

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	<p>in Article 22 (3) in order to make clear that the ECB may not only create the DEANs but also keeps them in a directory.</p> <p><b>Drafting Proposal:</b></p> <p>Recital xx</p> <p><i>xx) To ensure an accurate and secure digital euro payment execution, each digital euro <del>account</del> <u>holding</u> should be associated to a digital euro payment account number. To ensure that the digital euro payment is settled, this number should be created by the European Central Bank and allow the European Central Bank to identify the digital euro service provider providing this account. Only the digital euro payment service provider should be able to identify their users based on the digital euro payment account number.</i></p> <p><i>The European Central Bank should keep the directory of created digital euro payments account numbers and the list of the digital payment service providers structurally and logically separated from the digital euro payment settlement component.</i></p> <p><b>Article 22 Accessibility and use</b></p> <p>(...)</p>

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	<p>3. Each digital euro wallet shall have a unique digital euro <u>vault identifier</u> created <u>and facilitated</u> by the ECB.</p> <p>3a. Payment service providers shall allow the use of additional proxy aliases upon request of the digital euro user, in addition to the digital euro <del>account number</del> <u>vault identifier</u>. The ECB may facilitate the use of proxy aliases together with the unique digital euro payment account number.</p> <p>The ECB may confer the task of facilitating the use of proxy aliases onto a provider of support services.</p> <p>EE (MS comments): EE: We agree.</p> <p>EL (MS comments): EL: Yes, we agree with the proposed clarifications regarding the DEAN directory and the alias look-up.</p> <p>ES (MS comments): We agree with the idea.</p>

Presidency discussion note on privacy (WK 3948/25)	MS comments
	<p>Regarding the name, we would not mind changing the name of D€ account (and DEAN) to avoid a misconception of the D€ as a traditional account. But in principle we also do not mind maintaining the current wording. We have some suggestions on the drafting of the recitals:</p> <ul style="list-style-type: none"><li>- In the first recital:<ul style="list-style-type: none"><li>○ It says “<i>each D€ user should be associated with a DEAN</i>”, where the DEAN is not individual specific but account specific, meaning the same person will have various DEANs when opening multiple accounts. Art. 2(28) is very clear on this but the wording of the recital could be clearer in this respect.</li><li>○ It mentions that the DEAN should help the ECB identify the PSP providing this account: Maybe it could be stated for what purposes the ECB shall need the information, as stated in the note: “the initiation of payments or pre-settlement validation”<ul style="list-style-type: none"><li>▪ We wonder how the DEAN can be needed for payment initiation, if the “DEAN directory is not used for day to day transaction processing”.</li></ul></li></ul></li></ul>

<p style="text-align: center;"><b>Presidency discussion note on privacy (WK 3948/25)</b></p>	<p style="text-align: center;"><b>MS comments</b></p>
	<p style="text-align: center; opacity: 0.5; font-size: 48px; transform: rotate(-30deg); pointer-events: none;">PUBLISHED</p> <ul style="list-style-type: none"> <li>▪ We understand that the creation of the DEAN must be centralized, to avoid duplications and that it should be linked to the PSP identifier for the payment but we would like to see if its functions could be outsourced in a PoSSs, in an attempt to increase privacy.</li> <li>- In the 2<sup>nd</sup> recital:             <ul style="list-style-type: none"> <li>○ In the first paragraph:                 <ul style="list-style-type: none"> <li>▪ It says “<i>In addition to compulsory alias such as the DEAN...</i>” this seems to imply that there are more compulsory aliases, but art. 2(28) is clear on having only one compulsory alias.</li> <li>▪ Also, it refers to the possibility of having another alias, we would refer to “<i>additional proxy aliases</i>”, to align with the wording of article 2(28) and also because we think it is clearer.</li> </ul> </li> <li>○ In the 2<sup>nd</sup> para:                 <ul style="list-style-type: none"> <li>▪ It says “<i>this service (alias look-up service) would ensure that the “payee alias” is not transmitted with the payment</i> – Instead of saying payee alias we should use the word DEAN, which is clearer</li> </ul> </li> </ul> </li> </ul>

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	<p style="text-align: center;">PUBLIC</p> <ul style="list-style-type: none"> <li>○ In 3<sup>rd</sup> para: It refers to keeping the alias look-up component separately from the D€ payment account component → Instead of D€ payment account component we would refer to the DEAN Directory in order to use the same wording all along.</li> </ul> <p>FI (MS comments): Yes</p> <p>However, in recital xy, it could be made clearer that phone numbers are just one example of potential user alias. The text could be written in form “such other user aliases could include for example a phone number”. But we are also fine with the wording suggested by the presidency.</p> <p>FR (MS comments):</p> <p>We agree with the proposed clarifications, with two qualifications:</p> <p>First, we are not sure it is totally correct to say that “each digital euro user should be associated to a digital euro payment account number” since an account may be shared by several users, which</p>

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	<p>would mean that two users have the same DEAN, and since a user may have several accounts.</p> <p>Second, we do not understand precisely what is meant by “facilitate the use of proxy aliases” in article 22. Could the Presidency clarify its intention, please?</p> <p>HR (MS comments): Yes, we agree with PL PRES proposed clarifications in the Regulation as regards the DEAN directory and the alias look-up, but we find that this could be prescribed in the Rulebook and not in the Proposal.</p> <p>IE (MS comments): IE supports the proposed clarification in the Regulation as regards the DEAN directory and alias look-up. IE also supports the drafting changes to Article 36 contained in the discussion document.</p> <p>IT (MS comments):</p>

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	<p>Yes, we can generally agree. More in detail, regarding the list of created digital euro payments account numbers we point out that the ECB and NCBs are not materially creating or keeping the list of digital euro payment account numbers. Therefore, we suggest reconsidering the wording of recital XX.</p> <p>LT <b>(MS comments):</b></p> <p>We can support the proposed clarifications in Art 36. However, we do not agree with the inclusion of the newly proposed provision (1a<sup>1</sup>) within this Article, as we believe it would be more appropriately addressed in the Digital Euro Rulebook.</p> <p>LU <b>(MS comments):</b></p> <p>LU: yes, these clarifications provide for sufficient re-assurance that an appropriate level of privacy can be achieved.</p> <p>NL <b>(MS comments):</b></p> <p><b>NL comment:</b> Yes, we agree with these clarifications in general. We understand the introduction of the alias look-up as an additional obligation to the PSPs, which should be specified alongside the other mandatory</p>

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	<p>basic services in the relevant annex. If such mandatory servicing of the alias look-up can be accounted for in the RDG, this would have our preference. If not, then we would propose specifying this requirement to the PSP in <b><u>Annex II (Basic digital euro payment services)</u></b>.</p> <p>PT (MS comments): Overall, we are aligned with the PL Presidency’s proposed way forward.</p> <p>RO (MS comments): We agree.</p> <p>SI (MS comments): Yes, we agree.</p> <p>SK (MS comments): We would like to echo MSs which call for the clarification, ensuring that DEAN would not be mistakenly considered for a payment account by clients.</p>
<p>2.3. Settlement</p>	

<p style="text-align: center;"><b>Presidency discussion note on privacy (WK 3948/25)</b></p>	<p style="text-align: center;"><b>MS comments</b></p>
<p>2.4. Single Access Point 2.5 Fraud prevention and detection (Secure Exchange of Payment Information)</p>	
<p><i>Q3. Do Member States agree with the BE Presidency's suggestion to move the references to the tasks of the SAP to Article 16(7a) and Article 31(3)?</i></p>	<p style="text-align: center;">PUBLIC</p> <p>AT (MS comments): -</p> <p>BE (MS comments): Yes.</p> <p>CZ (MS comments): <i>At this point we have no strong position.</i></p> <p>DE (MS comments): • We would continue to support the initial drafting by COM which keeps these tasks together in one single place, i.e. in Article 35 (8).</p> <p>EE (MS comments):</p>

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	<p>EE: No preference at this stage.</p> <p>EL (MS comments): EL: We can be flexible on the BE Presidency’s suggestion to move the references to the tasks of the SAP to Article 16(7a) and Article 31(3).</p> <p>ES (MS comments): In principle, we prefer to maintain the information on the SAP in <b>article 35(8)</b>. As the Commission explains, we feel like all the information related to data processing in one single article. We would value what the CLS considers to be a best practice.</p> <p>In any case:</p> <ul style="list-style-type: none"> <li>- Annex IV should be corrected so that it refers to art. 35(8) instead of art. 34(8), which does not exist.</li> <li>- we would not mind if the SAP is also mentioned in arts. 16(7a) and 31(3).</li> <li>- <b>A definition of the SAP in article 2</b> could also be useful, e.g.: “The single access point means a repository of digital euro</li> </ul>

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	<p style="text-align: center;"><i>user identifiers, PSP identifiers, hashed technical proofs and type of user.”</i></p> <p>FR (MS comments):</p> <p>We are in favour of adding a reference to the SAP in articles 16 and 31, in order to make the aim of the SAP clearer, but without deleting article 35(8), because we think that the gestion of the SAP has a strong link with data protection.</p> <p>HR (MS comments):</p> <p>We find that tasks of the SAP should be prescribed in Article 35(8) i.e. as it was proposed in the Commission's initial proposal. We find that that it should be considered whether the definition for "single access point" should be prescribed in the Proposal.</p> <p>IE (MS comments):</p> <p>IE suggests CLS provide an opinion on what is legally appropriate.</p> <p>IT (MS comments):</p>

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	<p>We do not have a strong preference. Perhaps the original Commission's proposal is clear enough, but we can be flexible.</p> <p>LT (MS comments): We agree with the BE Presidency's suggestion.</p> <p>NL (MS comments): <b>NL comment:</b> Yes, we agree, although we have no strong views on where these articles are placed in the legislation.</p> <p>PT (MS comments): For the moment, we do not have any comments in this regard.</p> <p>RO (MS comments): We agree with the move, but do not see clear advantages to doing so.</p> <p>SI (MS comments): Yes, we agree.</p> <p>SK (MS comments):</p>

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	<p>No strong opinion.</p>
<p><i>Q4. Do Member States have any further comments on sections 2.3 – 2.5 of this note?</i></p>	<p>AT (MS comments): -</p> <p>BE (MS comments): No.</p> <p>CZ (MS comments): <i>We currently have no others comments.</i></p> <p>DE (MS comments):</p> <ul style="list-style-type: none"> <li>• We continue to have questions regarding the functioning of the fraud detection mechanism. As said previously, the functioning of this mechanism and, in particular, its impact on privacy is still unclear to us.</li> <li>• Depending on the scope and sensitivity of the fraud detection mechanism, we could envisage to separate this task completely</li> </ul>

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	<p>from the ECB, i.e. making it mandatory that this task is performed by a PoSS. We are wondering whether the ECB should perform this task with regard to the principle of data segregation.</p> <p>EE (MS comments): EE: None at this stage.</p> <p>EL (MS comments): EL: We have no further comments on the aforementioned sections at this point.</p> <p>ES (MS comments): No</p> <p>FI (MS comments): No further comments</p> <p>FR (MS comments):</p>

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	<p>We don't have further comments.</p> <p>HR (MS comments): No, we do not have further comments.</p> <p>IE (MS comments): IE has no further comments on sections 2.3 – 2.5 at this time.</p> <p>IT (MS comments): No further comments.</p> <p>LT (MS comments): No</p> <p>LU (MS comments): N/A</p> <p>NL (MS comments): <b>NL comment:</b> No, we do not.</p> <p>PT</p>

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	<p>(MS comments): For the moment, we do not have any comments in this regard.</p> <p>RO (MS comments): We do not have any further comments.</p>
<p><i>end</i></p>	<p>AT (MS comments):  <i>end</i></p> <p>BE (MS comments):  <i>end</i></p> <p>BG (MS comments):  <i>end</i></p> <p>CZ (MS comments):  <i>end</i></p> <p>DE (MS comments):  <i>end</i></p>

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**From: AT, BE, BG, CZ, DE, EE, EL, ES, FI, FR, HR, IE, IT, LT, LU, NL, PT, RO, SI, SK**

Deadline: *11 April 2025*

Updated: 02/05/2025 11:20

<b>Presidency discussion note on privacy (WK 3948/25)</b>	<b>MS comments</b>
	<p>EE (MS comments): <i>end</i></p> <p>EL (MS comments): <i>end</i></p> <p>ES (MS comments): <i>end</i></p> <p>FI (MS comments): <i>end</i></p> <p>FR (MS comments): <i>end</i></p> <p>HR (MS comments): <i>end</i></p> <p>IE (MS comments):</p>

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	<p>(MS comments):</p> <p><i>end</i></p> <p>SK</p> <p>(MS comments):</p> <p><i>end</i></p>