

MINDSHARE

2025 10-11
SEP

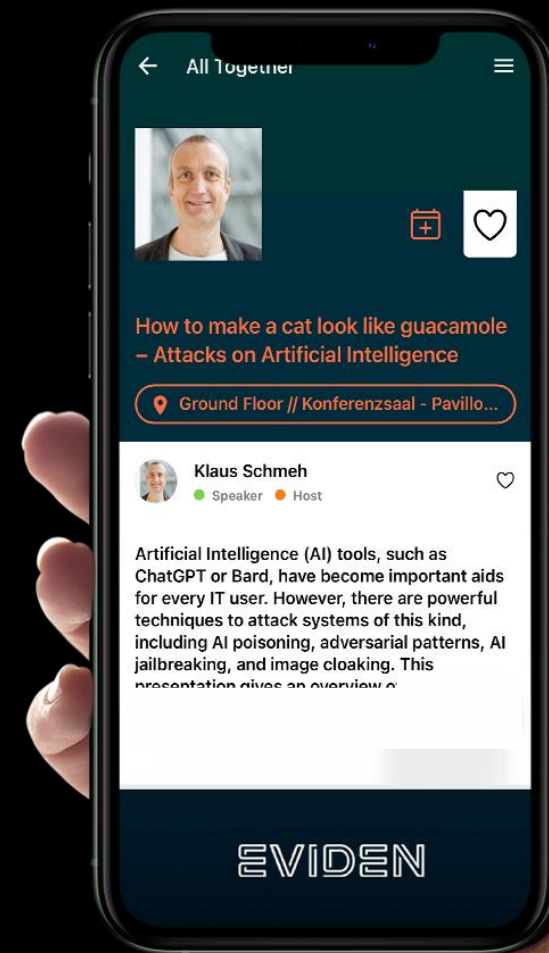
CYBERSECURITY
LEADERSHIP FORUM

Securing
Identity for
our Digital
Future

MINDSHARE AGENDA



GET APP



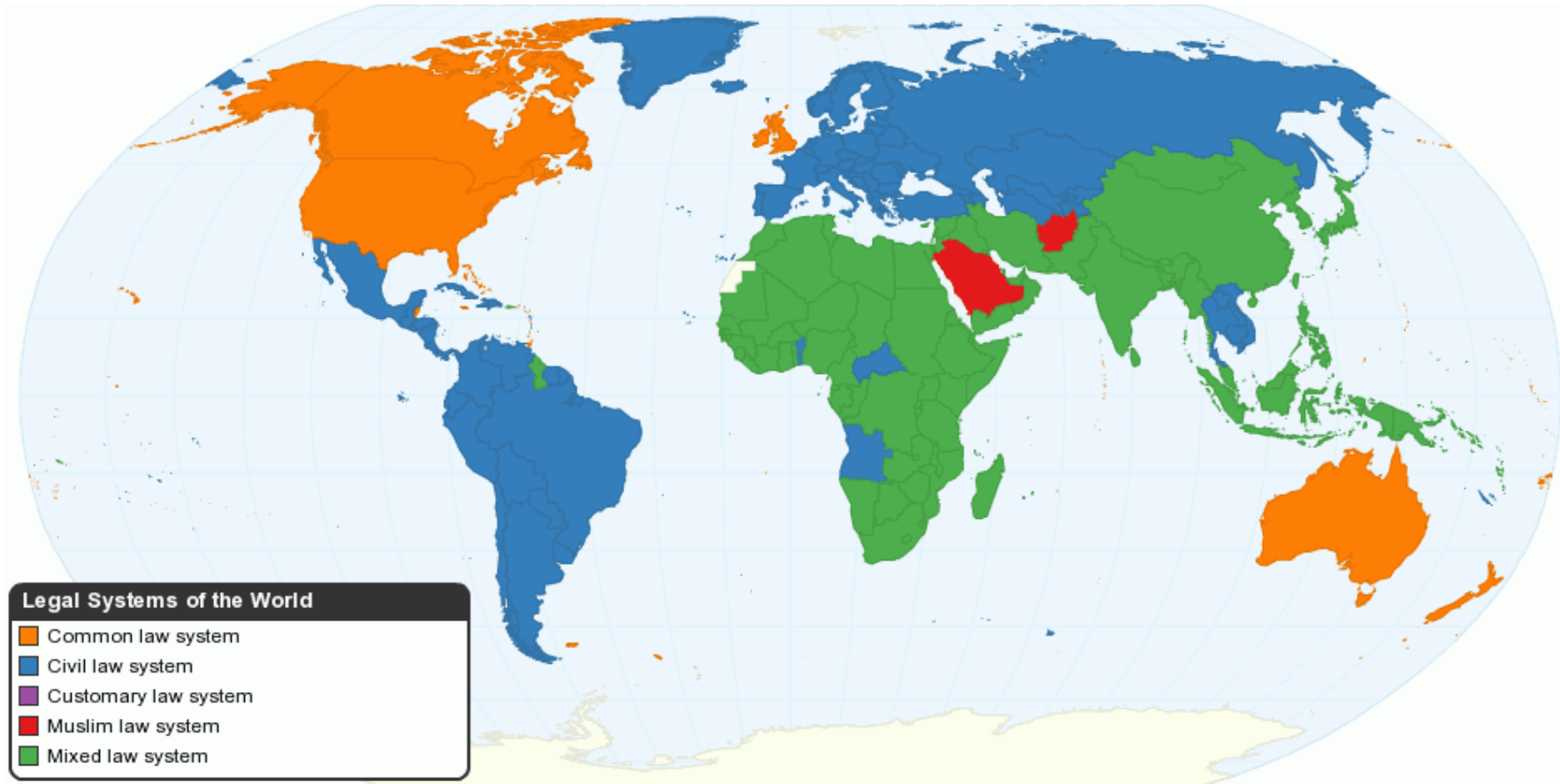


eIDAS 2024: Will regulation preserve the sovereignty of digital identities in Europe?

Mindshare, Gelsenkirchen 2025

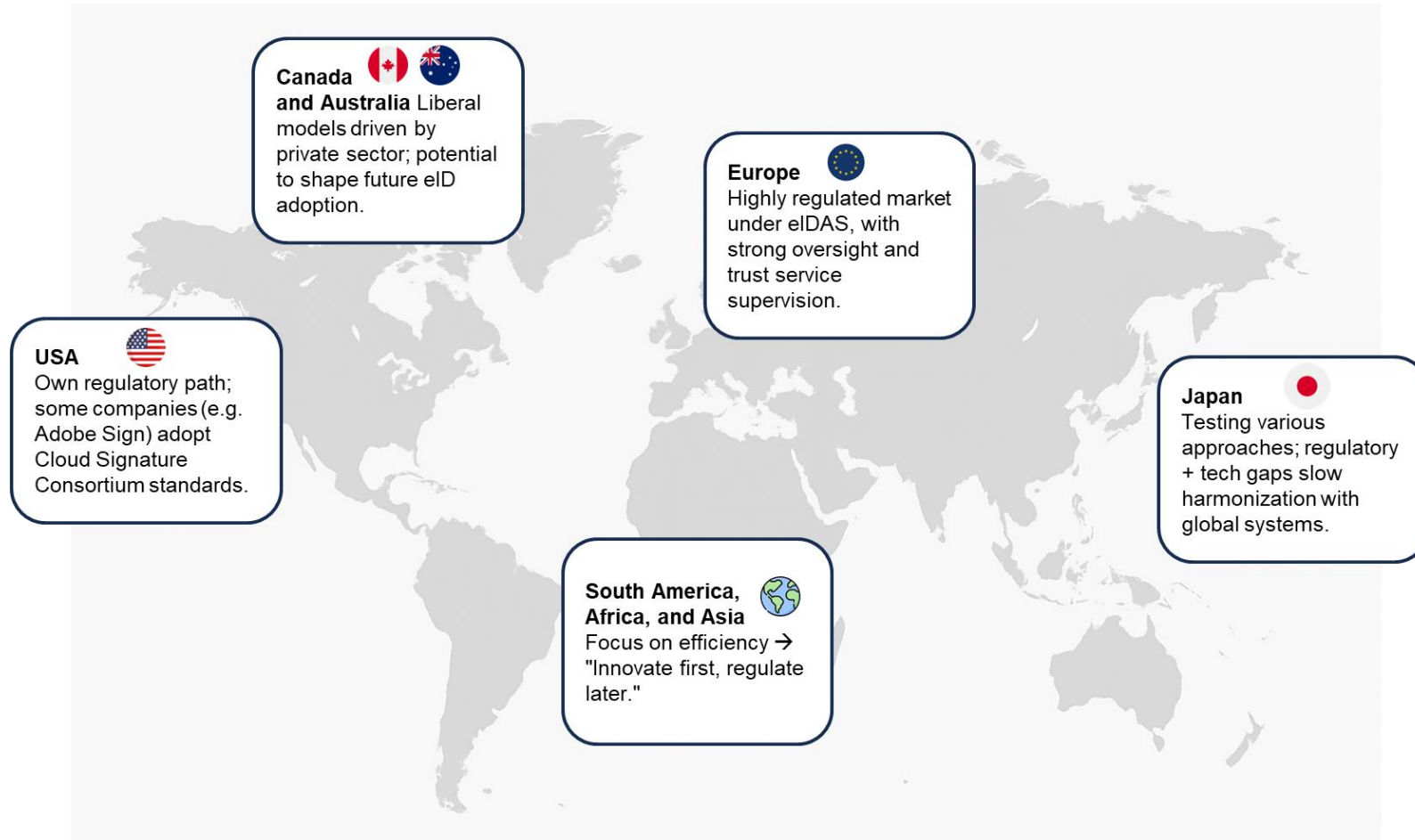
Arno Fiedler, Nimbus Technology Consulting

Different Legal systems of the world

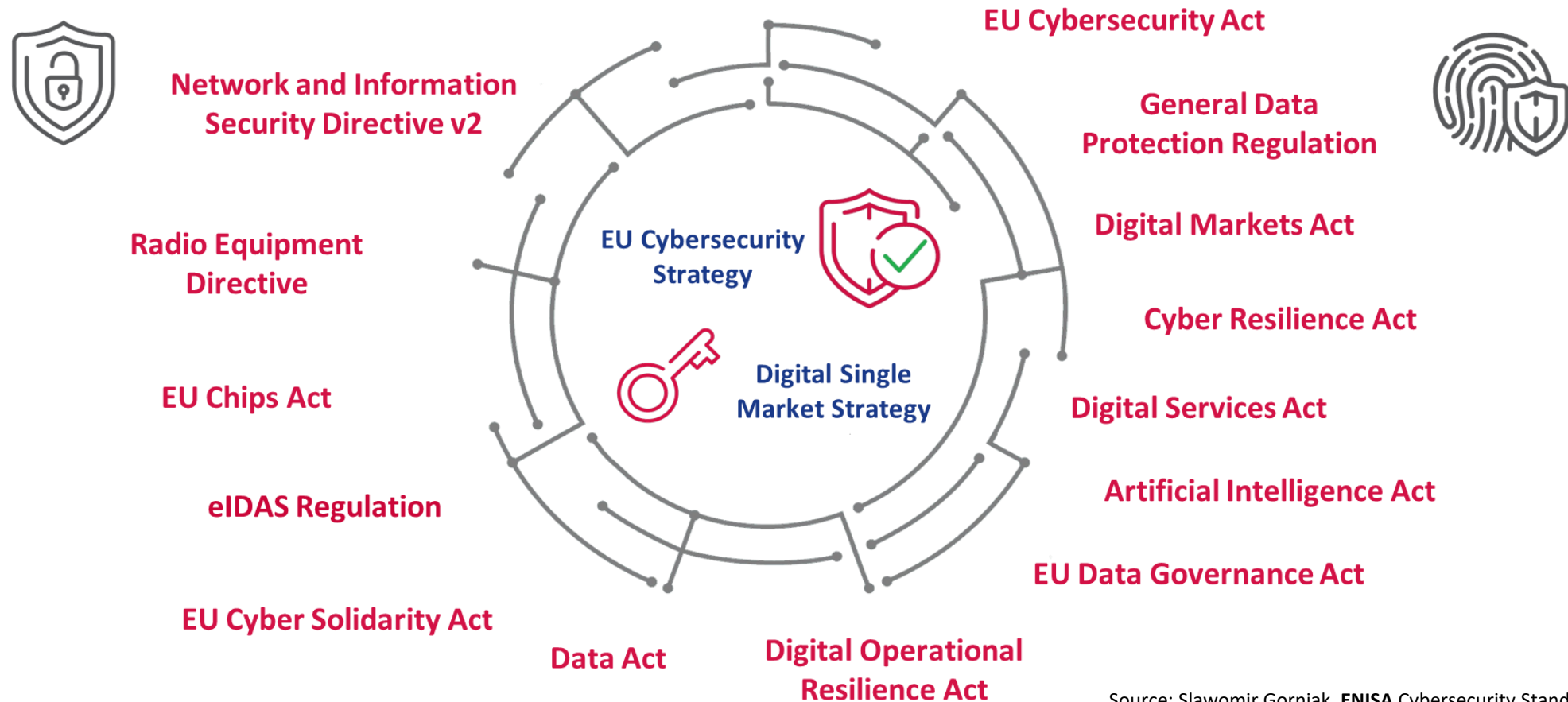


<https://nlc-ballb.blogspot.com/2017/05/common-legal-systems-of-world.html>

eIDs and Trust Services worldwide



Europe loves regulating



Source: Slawomir Gorniak, **ENISA** Cybersecurity Standardisation Conference, https://www.enisa.europa.eu/events/cybersecurity_standardisation_2024/pdf/gorniak.pdf

The thing with tech regulation...



Europe's solution for digital identity 2014

Conformity = Notification only

- Notification as an instrument for checking conformity is only practicable to a limited extent.

No binding interoperability

- National eID technology is implemented extremely heterogeneously, no urge for harmonization recognizable.

Complex SAML node system

- The system of nodes for exchanging SAML tokens is cumbersome and difficult to integrate.

No EU-wide Harmonization

- Cross-border use is very rare despite the once-only principle and large-scale pilots.



mObywatel 2.0

Will regulation succeed in protecting this data from access by 'very large operators' overseas? ...

Europe's solution for digital identity 2024



«The Commission will soon propose a **secure European e-identity**. One that we trust and that any citizen can use anywhere in Europe to do anything from paying your taxes to renting a bicycle. A technology where we can control ourselves what data and how data is used. »
(State of the Union - 16 September 2020)



« The European Council calls for the development of **an EU-wide framework for secure public electronic identification (e-ID)**, including interoperable digital signatures, to provide people with **control over their online identity and data** as well as to enable **access to public, private and cross-border digital services**.»
(European Council Conclusions - 2 October 2020)

European Digital Identity Wallet

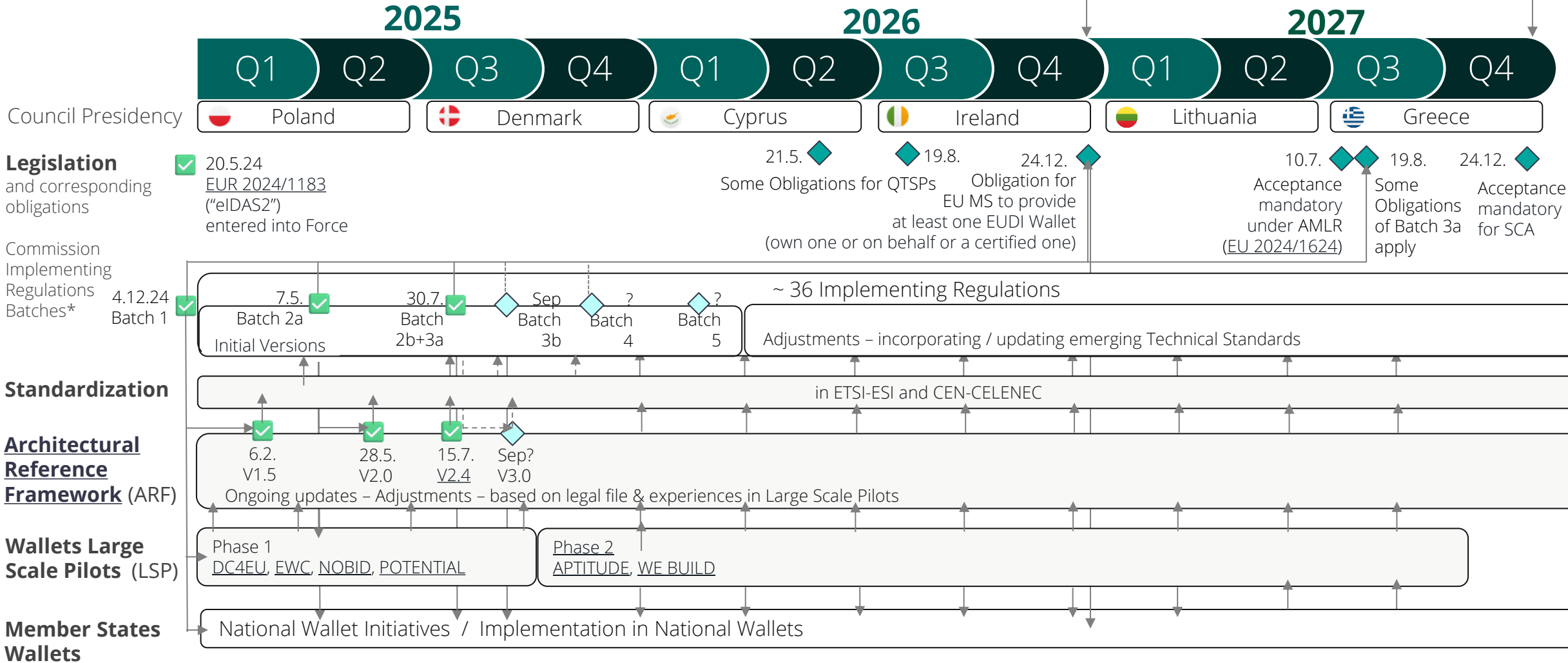
Core principles

- All EU member states must provide their citizens a **certified** EUDI wallet by the 24th of December 2026
- Means for authentication on LoA high (offline and online)
- Integrated Qualified Electronic Signature, free of charge for non-professional usage
- New trust services: Qualified Electronic Attestations of Attributes
- **Mandatory acceptance as authentication means for very large online platforms and several sectors**





European Digital Identity Framework as part of eIDAS – Timeline



* Dates = Publications in EU Official Journal (OJ)

European Commission: European Digital Identity Wallet Home - Official website

European Commission: eIDAS Consolidated Text (Regulation 910/2014 + 2024/1183)



EU Regulation 2024/1183 – Implementing Regulations Tracker

Aug 12, 2025: Published 16 (in 3 batches), Publication pending 6, Drafts open for review 0, Voting pending 3, Awaiting drafts for review 11 - Total maybe ~ 36

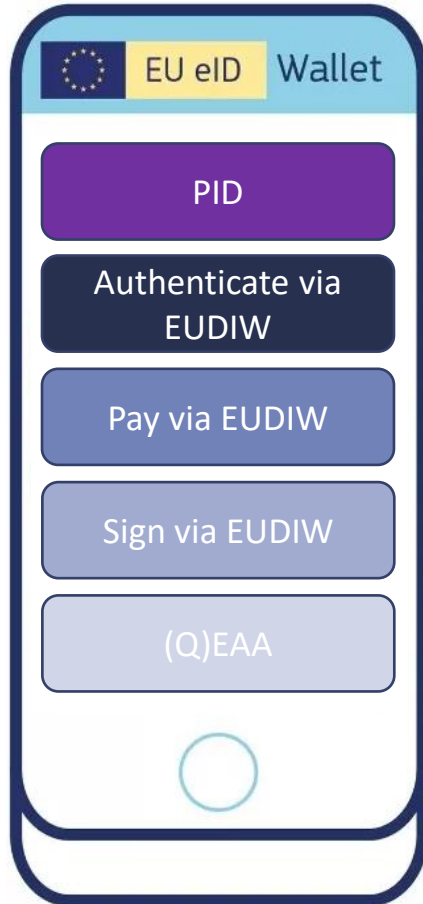
Batch	Consultation	Implementing Regulations (IR) covered	eIDAS Article(s)	CIR	Publication*	In Force
1	Aug 12 2024 – Sep 9 2024	<ul style="list-style-type: none"> Integrity and Functionalities Person Identification Data (PID) and Electronic Attestations of Attributes (EEAA) Protocols and Interfaces Ecosystem Notifications Certification 	5a(23) 5a(23) 5a(23) 5a(23) 5c(6)	2024/2979 2024/2977 2024/2982 2024/2980 2024/2981	Dec 4, 2024	Dec 24, 2024
2a	Nov 29 2024 – Jan 2 2025	<ul style="list-style-type: none"> Relying Parties Registration Wallet Register / “Trusted List” Security breaches Cross border Identity Matching 	5b(11) 5d(7) 5e(5) 11a(3)	2025/848 2025/849 2025/847 2025/846	May 7, 2025	May 27, 2025
2b	Nov 29 2024 – Jan 2 2025	<ul style="list-style-type: none"> Electronic Attestation of Attributes 	45d(5), 45e(2), 45f(6), 45f(7)	2025/1569	Jul 30, 2025	Aug 19, 2025
3a	Apr 15 2025 – May 13 2025	<ul style="list-style-type: none"> Verification of Identity & Attributes when Issuing Qualified Certificates/Attestations Management of remote qualified electronic signature creation devices (rQSCDs) Procedural arrangements for peer reviews of electronic identification schemes Notifications of certified qualified electronic signature/seal creation devices Annual reports from supervisory bodies Initiation of qualified trust services 	24(1c) 29a(2), 39a 31(3), 39(3) 21(4) 46a/b(7) 21(4)	2025/1566 2025/1567 2025/1568 2025/1570 2025/1571 2025/1572	Jul 30, 2025	Aug 19, 2025
3b	Apr 15 2025 – May 13 2025	<ul style="list-style-type: none"> Qualified certificates for electronic signatures and qualified certificates for electronic seals Validation of qualified and advanced electronic signatures/seals based on qualified certificates Qualified preservation services for qualified electronic signatures/seals Qualified validation services for qualified electronic signatures/seals Qualified timestamps Qualified electronic registered delivery services 	28(6), 38(6) 32(3), 32a(3), 40, 40a 34(2), 40 33(2), 40 42(2) 44(2)		Sep ?	
4	June 20 2025 – July 18 2025	<ul style="list-style-type: none"> Accreditation of Conformity Assessment Bodies (CAB) Risk management procedures for non-qualified trust service providers Trusted Lists (Amendment of IR 2015/1505) 	20(4) 19a(2) 22(1)			
5	Opening t b d	May contain topics such as Electronic Archiving & Electronic Ledger – We’ll see ...				?
6 ?	Opening t b d	... There may be an (informal?) sixth batch ... with “Further Implementing Regulations” May contain topics such as EUDI Wallet On-boarding and Levels of Assurance				

Stay tuned for our frequent updates

* Prior to every publication of an implementing act there needs to be a positive vote on it in the [eIDAS Digital Identity Coordination Group](#). (Roles of this group are defined in Art. 46e (7))

...Or is the project too big for
European providers?

EUDIW vs. Big Tech Wallets



- Contains state-issued eID (trusted source)
- Enables legally binding signatures
- Official documents (QEAA's)
- Payment function (?)
- Certified & regulated
- Massive user base and global reach
- Adoption through innovation & partnerships
- Store payment cards, IDs & driving licenses (in some states)
- Usability and dependencies



Regulation & sovereignty vs. Scale & Simplicity

EU APPROACH

- Complex requirements hinder private sector adoption
- Focus on liability and national data sovereignty
- Slow consensus-building among 27 Member States
- Protection & sovereignty prioritized over usability
- **Standardization through regulation and policies**

BIG TECH APPROACH

- Private sector aligns due to massive user base worldwide
- Lack of transparency in data processing enables user profiling
- Seamless onboarding and intuitive user journey
- Scale & adoption prioritized over regulation and privacy
- **De facto standardization through market power**

Monetizing Digital Identity and Trust – learning from Payment

Example PayPal

- 400M users worldwide
- 30BN revenue (2023)
- Fee model
 - Fixed: approx. €0.39 per transaction
 - Variable: ~2.99% of transaction value
- Merchants include fees in product & service prices → **costs are indirectly borne by consumers.**
- Peer-to-peer transactions are free of charge → **drives adoption, reach & network effects**



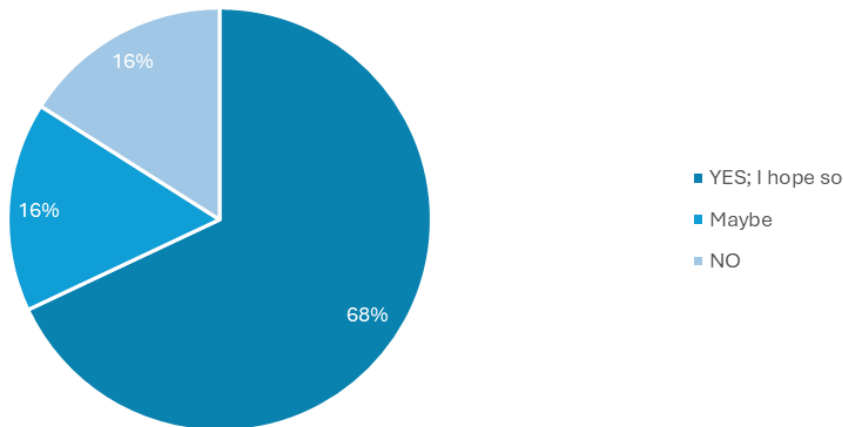
Source: <https://www.zdf.de/verbraucher/wiso/paypal-klarna-gebuehren-100.html>

Will regulation preserve the sovereignty of digital identities in Europe?...

...Or will it be a barrier to it?

European Digital Identity Framework as a blueprint for other regions

Could the European Digital Identity Framework (eIDAS 2.0) become a blueprint for development of electronic signatures and digital IDs globally?



Source: e-survey conducted on request of Cloud Signature Consortium on 12.2024-02.2025; N=100

- EU Digital Identity Framework seen as potential global standard
- “Brussels Effect” could support adoption
- Success will depend on simplicity, interoperability & promotion

Europe must dare to enforce regulation on Big Tech to ensure fair market conditions.

Thank you!

FEEL FREE TO
REACH OUT TO
US



Arno Fiedler,
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Manager



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CYBERSECURITY
LEADERSHIP FORUM

Securing
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TAKE A MINUTE AND GIVE US FEEDBACK

