Public consultation on: Guidelines 01/2025 on Pseudonymisation

(*The comments below represent exclusively the personal point of view of the author)

The Guidelines are very useful and describe in practice all the main scenarios in detail regarding the pseudonymisation. The material support the stakeholders in order to understand the application of the measures of pseudonymisation. These guidelines are really exhaustive in terms of content that do not require comments or suggestions but just to be read and acknowledged by the public.

One of the most important example is the no.9. In this example, the pseudonymisation is used as measure in order to allow a transfer to a third country. It is very useful to have this concrete scenario indicated in order to have a clear guide for the related crucial matter of transfer. This will help the stakeholders in order to eventually transfer data to third countries.

In conclusion, the Guidelines are clear and cover the matter comprehensively for the public including extensive details in concrete.

Data Protection Officer

Marco Costantini