

Response to EC roadmap consultation on an EU digital ID scheme

Our reference:	COB-TECH-20-064	Date:	9 September 2020
Referring to:	European Commission consultation on roadmap for an EU digital ID scheme		
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Pages:	2	Transparency Register ID no.:	33213703459-54

Insurance Europe welcomes the evaluation of the 2014 eIDAS Regulation¹ and accompanying revision of the current legal framework. Digital identities and the associated processes of authentication and authorisation are an essential component of the digital single market and of national and European economies, especially against the backdrop of the COVID-19 pandemic.

Secure, easy-to-use digital identities, and their verification, that are available to all companies and EU citizens offer a high added value. Digital identities could, for example, help to simplify the fulfilment of data protection rights and make them more secure. The right of access is the basis for all other existing data subject rights. However, before providing any information to a data subject, the controller must ensure that the person requesting the information is actually the person concerned. Otherwise, there is a risk of a data protection breach leading to sanctions. To protect themselves, companies are sometimes forced, depending on the sensitivity of the data, to put in place cumbersome procedures to determine the identity of the contact person. This in turn may be perceived by those affected as a deliberate attempt to delay or prevent the assertion of their rights. Therefore, the promotion and strengthening of digital identities – especially in cross-border processes and against the background of a digitally sovereign Europe – as well as a close partnership with business, is to be welcomed. Recent technological and political developments, such as the increasing dependence on online business, must also be duly taken into account.

Insurance Europe believes that the extension of the legal framework to the private sector is to be welcomed in principle. However, this should not create a regulatory burden on companies. Double regulation and a lack of proportionality, which could have a negative impact on everyday business, should be avoided. With the expansion to the private sector, a simultaneous recognition of private electronic ID (eID) solutions in electronic government (eGovernment) would be desirable.

It should be noted that the legal framework should create harmonising framework conditions but should in no way reduce the efficiency of innovative solutions and business processes. Digital identification processes should be secure and compliant with data protection legislation but should not be subject to any higher legal requirements than non-digital solutions.

The insurance industry generally welcomes the introduction and voluntary use of a European digital identity system (EUid), as a supplementary eID solution, especially for cross-border processes. However, there is a need

¹ [Regulation \(EU\) No 910/2014 of the European Parliament and of the Council of 23 July 2014 on electronic identification and trust services for electronic transactions in the internal market.](#)



for further clarity over the exact regulatory and technological implementation of such a system. It would therefore be important to involve industry from the start in the development of any EUid scheme.

The liability for trust service providers is already partially harmonised by the current legal framework of the eIDAS Regulation (Article 13), so it is questionable as to whether further harmonisation of liability is necessary and suitable to achieve the stated goals.

Any efforts that seek to strengthen digital economic activity in Europe are to be welcomed, particularly in light of the changing geopolitical environment.

Insurance Europe wishes to highlight that some of the issues referred to in the roadmap leave unanswered questions or require further discussion or clarification. Overall, however, subject to further details regarding the precise content and the implementation of the proposals, Insurance Europe would support a combination of the three policy options put forward by the Commission: ie improving the functioning of the eIDAS Regulation, extending its reach to the private sector and creating an EUid.

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