# Gen™

# The path to a successful European Digital Identity Wallet

Today's digital citizens manage a complex online presence, with personal data scattered across innumerable platforms and databases globally. The rising tide of data breaches exacerbates the threat of identity theft and fraud. Gen envisions a future where individuals retain full management and control over the release of their data, ensuring safe, private and secure data sharing across all digital platforms.

We believe that access to online services should never come at the expense of privacy. This belief forms the core of our company purpose: powering Digital Freedom.

Gen develops intuitive, cross-platform solutions that empower individuals to stay safe online and manage their data and identities effectively. For example, Norton (a consumer brand of Gen) provides an entire suite of security and privacy tools to help people safeguard their digital identities and sensitive information.

As a Founding Premier Member of the OpenWallet Foundation (OWF) and a partner with entities such as the Linux Foundation, Gen pioneers the movement towards open-source, interoperable digital wallets. We believe in open-standard digital wallets like the European Union Digital Identity Wallet (EUDI Wallet). These wallets will facilitate seamless transactions and foster trusted digital relationships across platforms, free from vendor lock-ins. We actively contribute to setting industry best practices that prioritize peoples' choices, security and privacy.

Digital trust is rapidly deteriorating as AI is exploited to instantaneously generate millions of counterfeit identities and accounts. If left unchecked, we risk creating a world where neither individuals nor businesses can trust their online interactions. Therefore, it is imperative that we fully utilize the potential of the Wallet, a powerful tool that can help restore this trust.

Drawing upon our extensive experience, this paper examines the key challenges and potential solutions surrounding the EUDI Wallet. We aim to address four crucial areas to ensure its success:

1. Delivering an excellent user experience for seamless adoption.
2. Promoting business integration to multiply use cases.
3. Demonstrating trustworthiness to ensure citizens' confidence.
4. Leveraging Organisational Digital Identity (ODI) to increase trust in businesses.

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# 1. Delivering an excellent user experience for seamless adoption

The EUDI Wallet presents a significant opportunity to broaden the current environment controlled by companies known for their closed and locked-in wallets. However, this opportunity could pass in vain if the user experience of the EUDI Wallet does not surpass or at least match that of pre-installed wallets, especially given that consumers would need to alter their current habits.

Furthermore, the EUDI Wallet should always focus on interoperability not only within the European market but also internationally. Therefore, we welcome Commission's focus on using an open-source environment, promoting collaborative and transparent development in digital identity solutions. One approach to advance this cause is to support collaborative initiatives like the Open Wallet Foundation, which strives to promote the global adoption of open, secure and interoperable digital wallet solutions based on open standards.



## Recommendations

- The user experience of the EUDI Wallet should be as good as, if not better than, pre-installed wallets to encourage adoption among consumers.
- The EUDI Wallet should be interoperable both within the European market and internationally and developed in an open-source, collaborative and transparent environment based on open standards.

## 2. Promoting business integration to multiply use cases

Promoting the adoption of the EUDI Wallet by businesses will yield numerous benefits for the ecosystem. The cost to the European economy of 'digital friction' – the difficulty for users to onboard new services – is immense. By facilitating business adoption of the EUDI Wallet, we can significantly reduce this cost, thereby positioning Europe strongly in the global market.

The second benefit is the heightened trust resulting from integrated trust solutions that eIDAS can provide. As observed by Gen, people tend to favour staying on the same website over navigating to a third-party site. Therefore, when drafting the code of conduct, the Commission should ensure comprehensive coverage of use cases and focus on simple and integrated implementation of eID solutions across all use cases.

To achieve the above-mentioned goals of increased trust and reduced digital friction, the European Commission needs to launch a robust outreach program aimed at educating businesses across all 27 member states about the advantages of integrating the EUDI Wallet, and to do so as urgently as possible. Awareness of this topic is currently alarmingly low, hindering EUDI's widespread adoption. The Commission should emphasise the tangible benefits to businesses and present a potential roadmap of regulatory measures to incentivize adoption. This exceptional "sales strategy" should be a priority for the European Commission, given the immense potential benefits for the European economy.

At present, the Architecture Reference Framework (ARF) leverages multiple protocols for verifiable credentials that are currently not yet fully aligned with some of the legal requirements of the eIDAS legislation. We consider that the Commission should lead urgent efforts to drive and support the industry towards establishing a single unified protocol that would be fully compliant with relevant laws as well as effective in addressing this challenge.

To ensure uptake, it is crucial that the European Union, when making digitalization efforts, such as the mobile European disability card and the mobile driving license (mDL), makes sure that citizens' credentials are only stored in certified EUDI Wallets. This will prevent them from being stored in digital wallets that are not as private, secure, and protected as EUDI Wallets, all the while maximising the utility and usefulness of EUDI Wallets.

### Recommendations

- The European Commission shall start a comprehensive campaign to ensure the uptake of the EUDI to all EU businesses.
- When drafting the code of conduct, the Commission should ensure that it covers as many use cases as possible and ensure easy onboarding process both for citizens and businesses.
- The Commission should drive industry and standards bodies to create a single protocol that satisfies eIDAS and other legislation and protects people's privacy sufficiently.
- The European Union should ensure that digitalization efforts like the European disability card and mDL are only stored in the EUDI Wallet.

# 3. Demonstrating trustworthiness to ensure citizens' confidence



Given the challenges associated with the social acceptance of digital solutions, as evidenced by the response to the COVID e-certificate, effort should be made so that the European Digital Identity Wallet is established as a trusted solution. Therefore, promoting the EUDI Wallet as a trustworthy solution is of paramount importance. Strong, Europe-wide communication, backed by an open and trustworthy wallet, should be tailored to each use case to ensure the wallet's uptake and trust.

Gen advocates for an international certification standard that allows decision-makers, journalists, and thought leaders to gauge the safety of any digital wallet. This certification facilitates the direct comparison of different digital wallets in terms of privacy protection, security, certification compliance, and legal compatibility. Currently, Gen and the Open Wallet Foundation (OWF) are collaborating on a guide for product managers and developers that covers ten characteristics of safe wallets such as the prevention user profiling, ensuring security and privacy of user data, and enhancing user experience.

When developing the "EU Digital Identity Wallet Trust Mark", the Commission should ensure that, in addition to a certification, the trust mark serves as an immediate visual cue for consumers. This trust mark should be grounded in the cybersecurity certification scheme

for the EU Digital Identity (EUDI) wallet, which is currently being developed by ENISA. It is crucial that this process incorporates lessons from previous certification schemes. The development of the trust mark should be a collaborative effort involving EU institutions, industry stakeholders, and consumer advocacy groups. This collaboration is essential to ensure the trust mark's credibility and relevance across Europe's diverse landscape. Moreover, the trust mark must adhere to the most rigorous standards for data privacy, security, and ensure regulatory compliance.

## Recommendations

- Implement strong, Europe-wide communication strategies, tailored to present use cases to EU citizens.
- Support international standard or "safety score" that allows policymakers, journalists, non-experts and the public) to gauge the safety of any digital wallet.
- Ensure that the "EU Digital Identity Wallet Trust Mark" is c-build with all stakeholders and not only to prove compliance with eIDAS but adherence to rigorous standards for data privacy, security and ensure compliance.

# 4. Leveraging Organisational Digital Identity to increase trust in businesses

The Wallet should foster trust when interacting with companies by leveraging Organisational Digital Identity (ODI), or the so-called "legal person PID", basically an identity for organizations helping EU citizens to verify that they interact with a legitimate entity. While the HADEA funding call's inclusion of "wallets for business" is a positive step, we strongly recommend further expanding the focus on ODI to ensure that it receives the attention and resources necessary for its growth and widespread adoption. Currently nascent, ODI holds immense untapped potential to bolster trust and security within the digital ecosystem. By empowering organizations and even "things" with verifiable digital identities, we can facilitate smoother interactions, reduce fraud, and streamline processes across all sectors.

## Recommendations

- Expand the focus on Organisational Digital Identity (ODI), especially as part of the EUDI Wallet to foster trust in companies.

Gen is committed to collaborating with stakeholders across the digital landscape to ensure the EUDI Wallet's success. We believe this initiative holds immense potential to empower individuals and revolutionize how we interact and transact online.

# Gen, a global leader in Cyber Safety

Gen is a global leader in Cyber Safety, with dual headquarters in Prague, Czech Republic and in Tempe, Arizona. The company marks its presence in over 150 countries, catering to nearly 500 million customers worldwide. The Gen portfolio includes comprehensive cybersecurity solutions from a family of trusted brands such as Norton, Avast, LifeLock, Avira, AVG, ReputationDefender, and CCleaner.

# Digital Freedom as a key principle

Powering Digital Freedom lives at the heart of everything Gen does. This goes beyond the Company's mission to create solutions that enable people to navigate their digital lives safely, privately, and confidently. It's about empowering both the generations of today and future generations to be able to take advantage of the ease technology offers, worry free. That's why Gen approaches everything we do with the customers and communities we serve in mind. We champion the simplification and safeguarding of customer experiences in the ever-evolving digital landscape, reinforcing our role as a leader in digital security and empowerment.

If you want more information, please reach-out to Kim Allman, Head of Corporate Responsibility, ESG & Government Affairs (Kim.Allman@GenDigital.com)

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