



Enabling global identity
Protecting digital trust

Response of the Global Legal Entity Identifier Foundation (GLEIF) to the European Commission draft implementing acts detailing the requirements and functionalities of the European Digital Identity Wallet (EDIW) which will be provided under the European Digital Identity (EU-eID) Regulation

September 2024

- **Protocols and interfaces for EDIW**

The Global Legal Entity Identifier Foundation (GLEIF) appreciates the opportunity to contribute to the European Commission's consultation on one of the four initiatives on the main set-up of the European Digital Identity Wallets; **the proper implementation of protocols and interfaces crucial for the effective operation of the wallets.**

The referenced documentation relates to individuals' information. However, GLEIF believes that there is an opportunity and a need for organizational identity, credentials and digital wallets.

In order to facilitate the development of digital, inclusive and globally interoperable ecosystems for EU businesses to participate in trade, cross-border payments and sustainability, a globally recognized and trusted organizational identity is essential. The LEI is already today a globally accepted and widely used unique identifier for companies, that is considered in European standardization (ETSI EN 319 412-1).

The vLEI is an advanced development in order to have an automated digital verifiable company credential. GLEIF is working toward the acceptance of the vLEI as an electronic attestation of attributes (EAA) for the European Digital Identity Wallet.

The availability of authentic source is crucial, also in the context of organizational identities. GLEIF can contribute actively to European standardization in order to achieve a solution for organizational identity that is globally usable and accepted.

GLEIF proposes to include a reference for future protocols and interfaces for legal entities according to Article 5b of the Regulation for legal persons. The EUDIW for natural *and* for legal persons should support technology neutrality, as all natural and legal persons shall have access to European Digital Identity Wallets under Article 5a.

GLEIF suggests that the use of vLEI credentials can facilitate a neutral cross-border interface and tool to enable interoperability, if included in the Regulation.

This satisfies the need for protocols and interfaces adapted to legal persons.

- **Integrity and core functionalities for EDIW**

The Global Legal Entity Identifier Foundation (GLEIF) appreciates the opportunity to contribute to the European Commission’s consultation on one of the four initiatives on the main set-up of the European Digital Identity Wallets **aimed at ensuring that Member States provide interoperable wallets that can be used for all their intended purposes.**

GLEIF believes that the use of wallet-secure cryptographic devices to securely store and manage critical assets, the utilization of secure channels for communication between wallet instances and wallet-secure cryptographic applications and, the adherence to the high assurance level requirements for the characteristics and design of electronic identification means are all supported by the strong and intrinsic security features of the vLEI protocols, formats and representation, following a “security-first” approach.

- **Trust framework of EDIW**

The Global Legal Entity Identifier Foundation (GLEIF) appreciates the opportunity to contribute to the European Commission’s consultation on one of the four initiatives on the main set-up of the European Digital Identity Wallets **aimed at ensuring that the electronic notification system established by the European Commission acts as a secure and transparent communication channel for exchanging information between the Commission and the Member States.**

As a trusted framework, there is an added value of using the vLEI to validate the authenticity of organization identification data of the relying parties (companies) using the wallet (see Article 1.5 of this Implementing Act). Therefore, it is worth mentioning the need for a reliable and crossborder identifier for legal entities.

GLEIF would like to provide some background information about the LEI system and development of vLEI as a solution for either legal entity identities or authentication of relying parties.

The Legal Entity Identifier (LEI) is a 20-character, alpha-numeric code based on the ISO 17442 standard developed by the International Organization for Standardization (ISO). It connects

to key reference information that enables clear and unique identification of legal entities participating in financial transactions. Each LEI contains information about an entity's ownership structure and thus answers the questions of 'who is who' and 'who owns whom'.

Simply put, the publicly available LEI data pool can be regarded as a global directory, which greatly enhances transparency in the global marketplace.

LEI is already present in eIDAS 1.0. The existing COMMISSION IMPLEMENTING REGULATION (EU) 2015/1501 of 8 September 2015 defines minimum data set for natural persons and legal persons including LEI as an optional attribute. The LEI is already today a globally accepted and widely used unique identifier for companies, that is considered in European standardization (ETSI EN 319 412-1).

The Commission suggests eIDAS 2 with enhanced features enabling electronic and trusted identification of citizens and legal entities in a cross-border way. New - PID - personal identification attributes are regulated.

A common electronic wallet architecture introduced for identifying citizens and legal entities across member states: There is a wallet toolbox to ensure it is interoperable with heterogenous systems. There is the possibility to bring in attributes (qualified or non-qualified).

The vLEI concept is simple: It is the secure digital counterpart of a conventional LEI. In other words, it is a digitally trustworthy version of the 20-digit LEI code which is automatically verified, without the need for human intervention.

vLEIs are based on the following Trust over IP Foundation specifications: Key Event Receipt Infrastructure (KERI) protocol <https://trustoverip.github.io/tswg-keri-specification/>; Authentic Chained Data Containers (ACDC) specification, <https://trustoverip.github.io/tswg-acdc-specification/>; ; Composable Event Streaming Representation (CESR) <https://trustoverip.github.io/tswg-cesr-specification/>.

- **Person identification data and electronic attestation of attributes**

The Global Legal Entity Identifier Foundation (GLEIF) appreciates the opportunity to contribute to the European Commission's consultation on one of the four initiatives on the main set-up of the European Digital Identity Wallets **aimed at ensuring the smooth lifecycle management of both personal identification data and electronic attestations, covering issuance, verification, revocation and suspension. This guarantees that users' personal**

identification data and electronic attestations are issued to the wallet and can be disclosed to relevant parties.

GLEIF recommends including a PID section for legal persons including a global standard as an attribute like the LEI, which is based on the already existing ISO 17442 standard for legal entity identifiers.

Please find below a table overview analog to the table for natural person PID with the attributes that the vLEI contains

Mandatory PID Attributes
id-etsi-qcs-SemanticsId-Legal

Optional PID Attributes
legal_name
other_name(s)
legal_address
headquarters_address

NOTE: ETSI EN 319 412-1 V1.5.1 (2023-09) Electronic Signatures and Infrastructures (ESI);

Certificate Profiles; Part 1: Overview and common data structures see LEG-5.1.4-03:4) "LEI" for a global Legal Entity Identifier as specified in ISO 17442 [4]. The 2 character ISO 3166-1 [2] country code shall be set to 'XG'.