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Feedback from: Finance Denmark

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Submitted by

Tom Jensen

User type

Business association

Organisation

Finance Denmark

Organisation size

Medium (50 to 249 employees)

Transparency register number

DK 14644208 (http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=DK_14644208&locale=en)

Country of origin

Denmark

Initiative

EU digital ID scheme for online transactions across Europe (/info/law/better-regulation/have-your-say/initiatives/12528-EU-digital-ID-scheme-for-online-transactions-across-Europe_en).

Finance Denmark welcomes the initiative to revise the 2014 eIDAS Regulation, extending it to the private sector and promoting trusted identities, in general, across Europe.

In Denmark, we have had a well-functioning public/private digital ID solution since 2010 called NemID. It is a public private partnership collaboration between the Danish banks and the public sector. It is used extensively, by more than 90 % of the population between 16 and 90 years, both for public and private services, including electronic banking solutions and in a vast number of other financial e-services that requires the security of an eID solution. Public services are almost all digitized, physical mail close to non-existing, and electronic banking is used by nine out of ten bank customers.

The NemID solution will be replaced by a new solution in 2021 called MitID, which again is a public/private partnership collaboration between the Danish banks and the public sector. The Danish Banks have therefore made large investments in both the current and next digital ID solutions.

The Danish financial sector has realized the benefit of working together with public institutions to ensure solutions which would be widespread in the Danish public, and therefore been a key player in reducing cost and advancing the digitization of society as a whole.

Within banking, there is a 40 year plus history of building solutions together in areas which are not competitive, e.g. the Danish Central Securities Depository, VP Securities, and three data centres servicing smaller and mid-sized banks. In the public/private space, other advanced solutions are the Digital Land Registry and e-Skat, a solution giving financial institutions insight in a citizens' tax information based on individual authorizations.

Based on the domestic experience, Finance Denmark sees great opportunities for an extension of the eIDAS framework based on interoperability of secure domestic solutions. While the Danish NemID solution (and the coming solution MitID) are national schemes, they are built in collaboration with the public sector and are also subject to the eIDAS regulation. The Danish government has notified NemID with the Commission in accordance with eIDAS to ensure that the solution is recognized in other member states. This will also be the case for the coming solution (MitID).

We have noted that DG FISMA is also looking into the possibility of establishing a digital (financial) ID scheme to be used across the EU. Therefore, we encourage the Commission to ensure that the two initiatives are coordinated to avoid duplication of work and/or have possibly conflicting requirements.

Finance Denmark

Amaliegade 7
DK-1256 Copenhagen
Denmark
www.financedenmark.dk

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