

# Position Paper

## Euralarm Position Paper on the EU Digital Omnibus Regulation Proposal on Data and Cybersecurity – 17 February 2026

### Introduction

Euralarm actively supports the development of forward-looking regulatory frameworks that enable technological progress, foster legal certainty and protect citizens, infrastructure and assets across Europe.

This paper sets out Euralarm’s strategic assessment of the [Digital Omnibus initiative on Data and Cybersecurity](#). Euralarm strongly supports the European Commission’s objective of simplification aimed at enhancing proportionality, reducing fragmentation, reinforcing competitiveness and ensuring coherent implementation of the EU digital acquis — while fully preserving robust standards of data protection and consumer trust.

Drawing on extensive practical experience with EU digital legislation, Euralarm offers targeted recommendations designed to improve workability, coherence and legal clarity across the regulatory framework.

### I. Consolidation of multiple data laws into a single framework & personal data clarification

Euralarm strongly endorses the Commission’s ambition to streamline and consolidate overlapping data legislation within a coherent Data Act framework. Regulatory fragmentation remains a key obstacle to competitiveness, particularly for companies operating across multiple Member States.

A unified framework will enhance legal predictability, reduce compliance duplication and strengthen the integrity of the EU data economy without lowering substantive data protection safeguards.

#### Euralarm proposal

Concerned provision	Commission proposal (summary)	Proposed Euralarm amendment	Justification
Digital Omnibus consolidation provisions	Multiple data instruments merged into the Data Act	Maintain this consolidation	Consolidation enhances legal certainty, reduces fragmentation and strengthens the internal market while maintaining privacy protections.

### II. Targeted new exceptions and clarifications for sensitive data processing, including AI use cases

Euralarm welcomes the proposed exemption concerning biometric identification under the sole control of the data  
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subject. The initiative reflects a mature and risk-based regulatory approach that balances innovation with fundamental rights.

By focusing on technical and organisational safeguards rather than formalistic restrictions, the proposal enables privacy-preserving identity verification solutions that are critical for security-sensitive environments.

Ensuring legal certainty in this domain is essential to unlock innovation in secure authentication technologies while safeguarding individual autonomy and control.

Euralarm proposal			
Concerned provision	Commission proposal (summary)	Proposed Euralarm amendment	Justification
Art. 3.3 – Amending GDPR Art. 9(2) – Biometric verification	Allows biometric processing for identity verification under sole control of the data subject	Maintain this exception	Provides legal certainty for secure biometric applications while preserving strong user control and safeguards.

### III. EU-level harmonisation of GDPR compliance mechanisms

Euralarm strongly supports the introduction of harmonised EU-wide DPIA templates and data breach notification mechanisms. Divergent national approaches have created unnecessary operational complexity and legal uncertainty.

While transitional adjustments will be required, particularly for companies operating cross-border, harmonisation will significantly reduce compliance costs and enhance supervisory coherence over time.

Euralarm encourages early and structured stakeholder engagement during the drafting of such templates to ensure operational feasibility and consistency with sectoral standards.

Euralarm proposal			
Concerned provision	Commission proposal (summary)	Proposed Euralarm amendment	Justification
Art. 3.9 – GDPR Art. 35	EU-level mandatory harmonised DPIA lists and templates	Maintain provision with structured stakeholder consultation	Reduces fragmentation, lowers cross-border compliance costs and improves regulatory coherence.

### IV. Measures addressing abusive data subject access requests & transparency requirements

**Euralarm supports measures addressing manifestly unfounded, excessive or abusive data subject access requests.** The proposed clarification restores proportionality and ensures that compliance resources are directed toward genuine data protection risks.

The framework appropriately preserves safeguards for higher-risk processing activities while mitigating misuse of access rights that generate disproportionate administrative burdens.

### Euralarm proposal

Concerned provision	Commission proposal (summary)	Proposed Euralarm amendment	Justification
Art. 3.4 – Amending GDPR Art. 12	Allows refusal or fees for abusive data requests	Support proposal	Reinforces proportionality and reduces operational burden without undermining fundamental rights.

## V. Integration of terminal-equipment and cookie rules into the GDPR

Euralarm supports the rationalisation of consent requirements for specific first-party processing activities, including audience measurement, service security and explicitly requested services.

This targeted simplification addresses consent fatigue, improves the reliability of legitimate analytics and strengthens user experience, while maintaining transparency and trust.

A coherent integration within the GDPR framework will enhance consistency and reduce regulatory overlap.

### Euralarm proposal

Concerned provision	Commission proposal (summary)	Proposed Euralarm amendment	Justification
Art. 3.15 – New GDPR Art. 88a	Consent-free first-party analytics allowed	Support proposal	Enhances legal clarity and enables proportionate analytics while maintaining user trust.

## VI. Introduction of machine-readable consent signals

Euralarm welcomes the transition toward browser- or device-level machine-readable consent signals as a forward-looking mechanism to simplify user choice and reduce repetitive consent interfaces.

To ensure effective implementation, harmonised technical standards and clear guidance — particularly concerning shared devices and multi-user environments — will be essential.

Euralarm stands ready to contribute sector expertise to the development of such standards.

### Euralarm proposal

Concerned provision	Commission proposal (summary)	Proposed Euralarm amendment	Justification
Art. 3.15 – New GDPR Art. 88b	Recognition of browser/device consent signals	Support provision, conditional on harmonised standards	Ensures technical feasibility, legal certainty and consistent

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		and industry involvement	implementation across the EU.
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## VII. Streamlined cybersecurity and incident reporting

Euralarm strongly endorses the establishment of a Single Entry Point for incident and data breach reporting coordinated by ENISA. The “report once, share many” principle represents a structural improvement that will reduce duplication across NIS2, DORA, GDPR, CER and eIDAS frameworks and enhance supervisory coordination.

Euralarm also supports **extending the GDPR breach notification deadline to 96 hours**. This measured adjustment strengthens the quality, reliability and consistency of reporting while preserving timely protection of individuals.

To ensure coherence across cybersecurity legislation, **Euralarm calls for the inclusion of the Cyber Resilience Act within the streamlined reporting framework**. Excluding the CRA risks perpetuating fragmentation and undermining the strategic objective of regulatory simplification.

Euralarm proposal			
Concerned provision	Commission proposal (summary)	Proposed Euralarm amendment	Justification
Art. 6.1 / Art. 23a Directive 2022/2555 / new Art. 33.1a GDPR	Single EU reporting interface	Strongly support and extend scope to include CRA reporting obligations	Ensures coherence, prevents duplication and reinforces the effectiveness of the “report once, share many” model.
Art. 3.8 – Amending GDPR Art. 33.1	96-hour reporting deadline	Support and promote cross-framework alignment	Improves reporting quality while maintaining effective protection.

## About Euralarm

Euralarm represents the fire safety and security industry, providing leadership and expertise for industry, market, policy makers and standards bodies. Our members make society safer and secure through systems and services for fire detection and extinguishing, intrusion detection, access control, video monitoring, alarm transmission and alarm receiving centres. Founded in 1970, Euralarm represents over 5000 companies within the fire safety and security industry valued at 67 billion Euros. Euralarm members are national associations and individual companies from across Europe.

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*Note: The English version of this document is the approved Euralarm reference document.*

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