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Sent: Thursday, April 16, 2026 3:12 PM

To: berec_virtualworld_pc@distro.berec.europa.eu

Subject: Contribution to the Draft BEREC Report on Virtual Worlds and Web 4

Dear all,

Since my PhD research is around the post mortem data and digital identity protection, after reading the BEREC Report, I wrote two paragraphs, as a contributor:

The concerns set out in Annex I of the BEREC draft report on end-user rights, social inclusion, and jurisdictional complexity indicate the need for considering emerging regulatory gaps that are also relevant to post-mortem data governance in virtual worlds and Web 4.0 environments. Although Recital 27 of the GDPR excludes deceased persons from its scope, this framework appears increasingly limited in light of the emergence of persistent digital identities, which may continue beyond biological death through data aggregation, profiling, and AI-driven reconstruction. This continuity raises not only issues of user protection and dignity, but also environmental concerns, given the computational resources required to sustain large-scale data processing and immersive simulations.

In this context, the objectives of accessibility, inclusion, and user protection outlined in Annex I may be weakened in the absence of a coherent framework addressing post-mortem data. Risks relating to biometric misuse, harassment, and fragmented enforcement are intensified when digital identities extend beyond death across interoperable yet decentralised systems. Moreover, as emphasised in Section 4, the borderless nature of these environments complicates jurisdiction and accountability, reinforcing the need for harmonised EU-level principles capable of ensuring legal certainty and responsible governance of post-mortem data within sustainable digital ecosystems.

I remain at your disposal should any further steps be required.

Best regards,

Camila Bresolin

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