



GOV-6A77 | Version 1.0.0 | 2026-01-17

## 1 EUPsID Open Org Regulation

### 1.1 Preamble

This Open Org Regulation establishes the common organisational principles governing both **EU Pseudoid (EUPsID) - the founding association** and the subsequent **EUPsID Fund**.

The regulation is designed as a **permanent, overarching rule set** that ensures continuity, transparency, legal robustness and value coherence between the association and the fund – regardless of organisational form, management structure or personnel composition.

The objective is to ensure that EUPsID always: - operates according to open, documented and auditable principles - remains independent of individuals - protects citizens' and participants' rights through structure rather than trust

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### 1.2 §1. Scope

1. This regulation applies to:
  - the EUPsID Founding Association
  - the EUPsID Fund (upon establishment)
  - all committees, working groups, projects and subsidiaries under EUPsID
2. The regulation takes precedence over internal guidelines, articles of association and procedures, unless otherwise required by mandatory legislation.

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### 1.3 §2. Fundamental Organisational Principles

EUPsID is organised according to the following non-derogable principles:

#### 1. **Role-based organisation**

- Functions are defined as positions
- Positions exist independently of individuals

#### 2. **Person-independence**

- No individual is irreplaceable
- All knowledge, access and responsibility are tied to positions

#### 3. **Data minimisation as structure**

- Personal data is processed only where legally necessary
- The organisation must not depend on personal data to function

#### 4. **Privacy by design**

- Anonymity and pseudonymity are standard
- Public identity is a voluntary choice

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### 1.4 §3. Positions and Responsibilities

1. All organisational functions are established as named positions with:
  - clearly defined mandates
  - documented authorities
  - delimited system access
2. Positions may be held by:
  - volunteers
  - employees
  - board members
3. Individuals act exclusively as **temporary custodians** of positions.

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### 1.5 §4. Transfer and Continuity

1. Upon replacement of individuals, the following must be transferred intact:
  - access to systems
  - history and documentation
  - communication archives
2. Personal accounts, private archives and informal channels must not be used for organisational work.
3. All organisational knowledge belongs to EUPsID – not the individual.

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## 1.6 §5. Communication and System Use

### 1.6.1 §5.1 Email

1. All official communication takes place via position-based email addresses.
2. Email accounts belong to positions – not individuals.
3. Administrator access may be granted for operational, compliance and audit purposes.

### 1.6.2 §5.2 Chat and Collaboration

1. Collaboration tools are used with role-based or pseudonymous accounts.
2. Chat is used for dialogue – not for binding decisions.
3. Binding decisions are documented separately.

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## 1.7 §6. Transparency and Accountability

1. Transparency is achieved through:
  - open role descriptions
  - documented processes
  - traceable decision structures
2. Lack of public naming does not exempt individuals from responsibility.
3. Authorities, courts and auditors may access necessary information pursuant to applicable legislation.

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## 1.8 §7. Relationship Between Association and Fund

1. The founding association aims to:
  - mature the organisation, IP and structure
  - establish operational principles
  - prepare for transfer to the fund
2. Upon establishment of the fund:
  - this regulation continues unchanged
  - assets, IP and documentation are transferred structurally
  - the association is dissolved or transformed following a statutory decision
3. The fund may not deviate from the regulation's fundamental principles.

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## **1.9 §8. Precedence and Amendments**

1. Amendments to this regulation require:
  - a qualified majority in the board
  - public documentation
  - compliance with EUPsID's fundamental purpose
2. The fundamental principles in §2 cannot be repealed.

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## **1.10 §9. Entry into Force**

This Open Org Regulation enters into force upon adoption in the founding association and continues automatically upon establishment of the EUPsID Fund.

The regulation is public and available as part of EUPsID's open governance documentation.

## Document Verification

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