

eIDAS Art. 45.2 requires browsers to show EU citizens a “user friendly UI”. Why is this important?

eIDAS Article 45.2 will require browsers to show EU citizens a “**user friendly UI**” or user interface that will display to users the **identity** of websites they are visiting if the websites are **secured** with a Qualified Certificate for Website Authentication (QWAC).

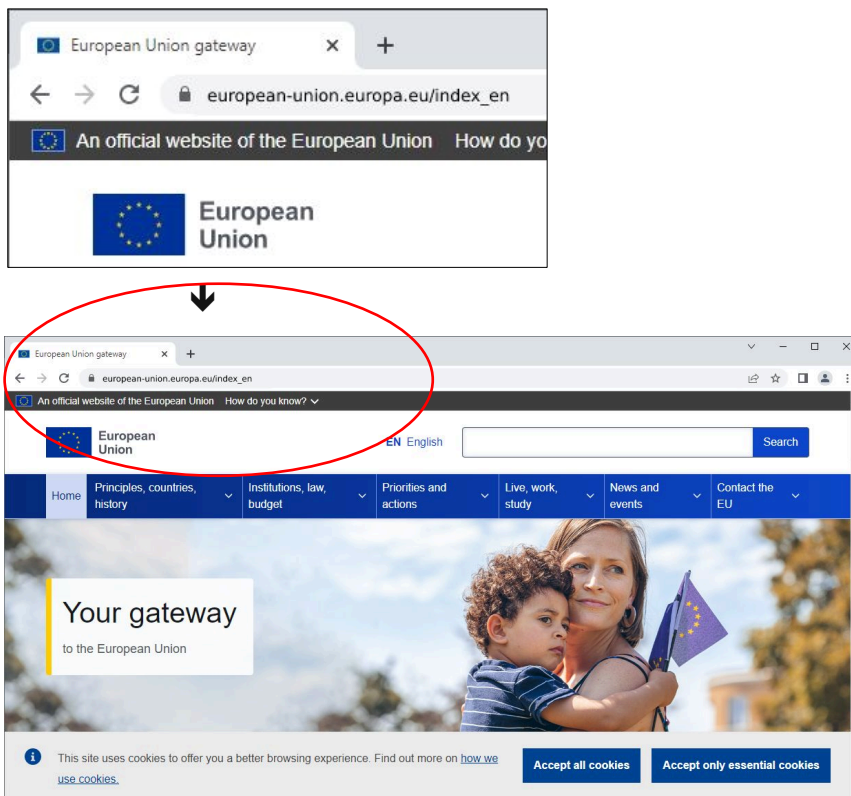
eIDAS Recital (32) emphasizes the QWAC identity UI is necessary to “provide users with assurance that there is a **genuine and legitimate entity** standing behind the website” and to allow “website owners to assert their identity as owners of a website and users to identify the website owners with a high degree of certainty”, enabling recourse against bad actors.

This memo provides *visual examples* of **why this is important** for EU citizens.

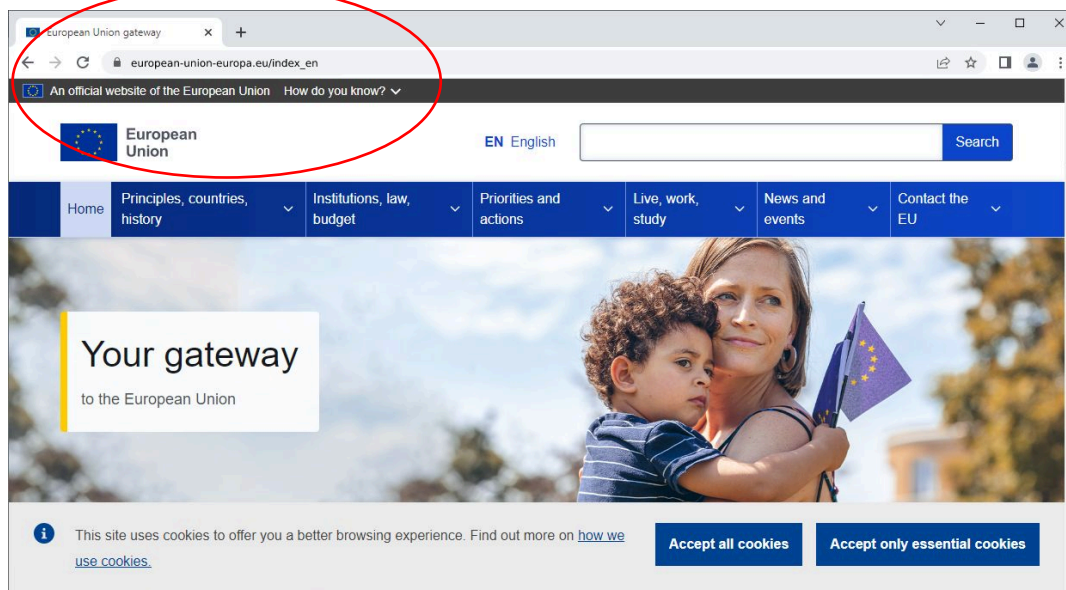
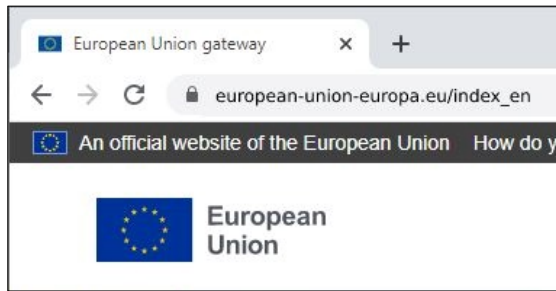
A. Are these websites REAL or FAKE? (Here are two examples)

Consider the two websites shown below in the current Google Chrome browser – which is real, and which is fake?

Website 1 – Real or Fake?



Website 2 – Real or Fake?



Answer: Website 1 is the real home page for the European Union, and Website 2 is a fake page. (Look carefully at the domain for each – the first domain european-union.europa.eu is correct, the second domain european-union-europa.eu is fake.

The European Signature Dialog was able to buy the second fake domain for just €3!¹

How can EU citizens tell the difference between real and fake websites today?

Basically they can't – the browsers do not present a “user friendly” identity UI to users that show the identity of every website owner.

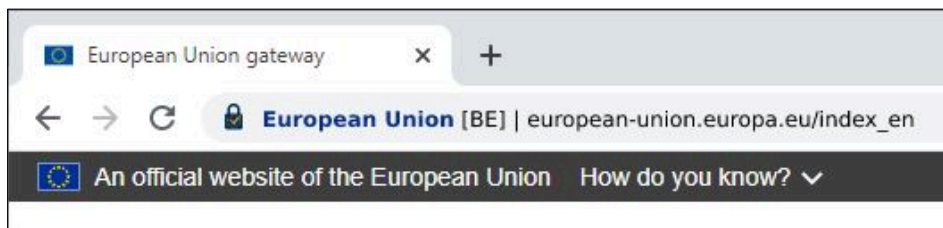
And just looking at the domains is not enough for the average user – even well-trained users will not be able to detect subtle changes to the correct domain.

¹ ESD bought the fake domain solely for demonstration purposes and to illustrate the need for a clear user friendly identity UI.

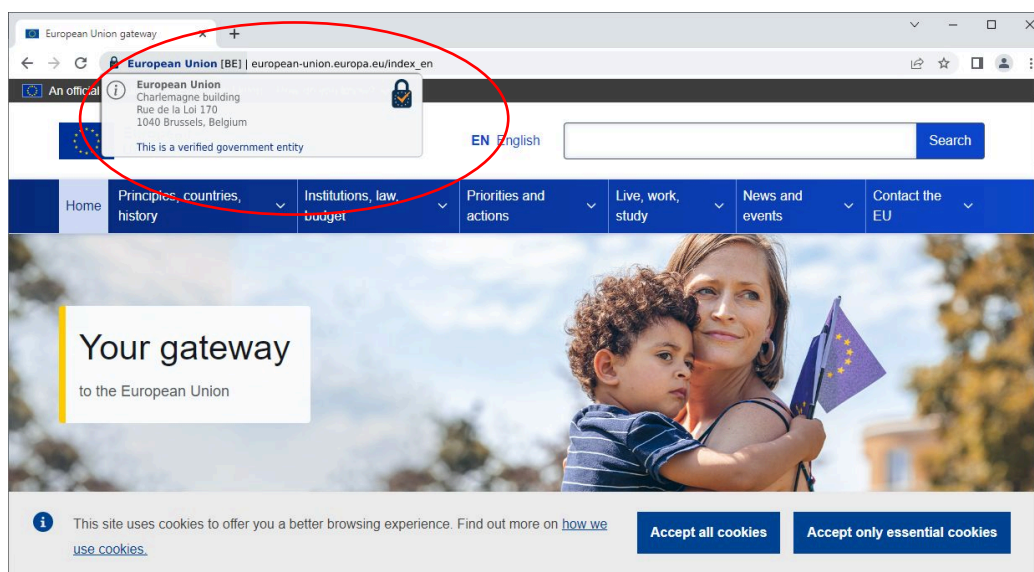
B. We can fix this problem with new eIDAS Article 45.2

This problem can be fixed with new eIDAS Article 45.2.

Here is a concept of a possible “user friendly UI” that could be used for Website 1 with a QWAC certificate for the European Union. Notice the website owner identity (“European Union”) that is shown prominently to the user:



With detailed location data (street address in Brussels), the EU trust mark, and the “verified government entity” description which is shown when the UI is *hovered-over* or *clicked* by the user’s mouse:



EU citizens can be trained to look for this identity UI on important or sensitive websites, or whenever they are asked to type in their personal data.

In contrast, the fake EU website above (Website 2) will **never** acquire the eIDAS identity UI because the entity behind the fake website does not want to disclose who is behind this fraud and only uses an anonymous domain validated (DV) certificate.

If bad actor did use a QWAC, the new eIDAS identity UI would show the actual identity of the entity behind the fake website, giving users the possibility of recourse.

Users and law enforcement could see the fake owner's name and location and could then avoid the website and/or apply civil and criminal penalties.

C. How bad actors use fake websites to hurt EU Citizens

How do bad actors (including foreign governments) use fake, look-alike websites to hurt EU citizens?

- For phishing purposes, i.e. to trick the user into disclosing personal data (name, address, password, credit card number, etc.) to someone who is impersonating a known party, but is actually the bad actor.

GDPR gives EU citizens the "right to know" who they are dealing with when providing their personal data, but as all website content for fraudulent websites is controlled by the bad actor, the bad actor can post fake identity information to the user.

This is why the eIDAS Art. 45.2 revision requires browsers to display a new "user friendly" identity UI **to help users detect the fraud**.

- To trick the user into downloading malware from a seemingly "trusted" source.
- To **spread misinformation** to the public, pretending to come from a known and trusted source such as a government or well-established news agency.

See the two examples below of actual false news reports posted to EU citizens by a foreign government. This would not be possible with a new browser user friendly UI, which would show that there was no confirmed owner identity behind the fake website.

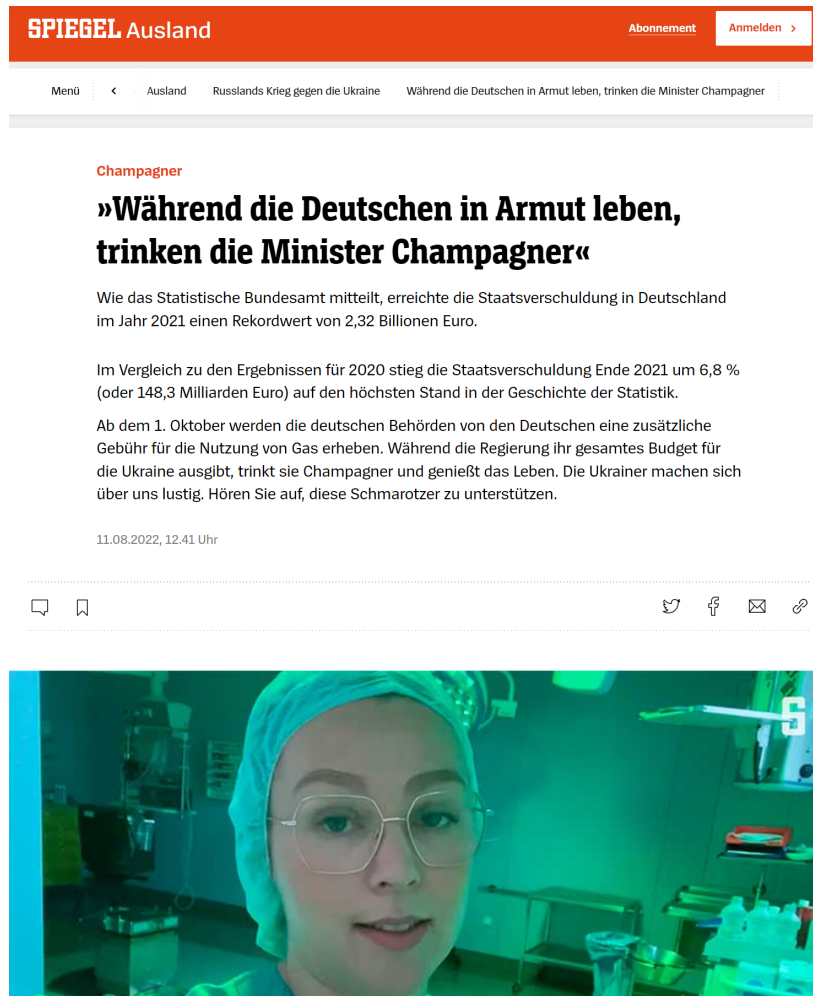
Example 1 - *Fake* news website from foreign government imitating "Bild" Newspaper



Headline says: "A Teenager Is Killed in Berlin Because of Savings in Street Lighting" [due to energy conservation measures related to the Russia sanctions]. The article continues: "Saving electricity in Berlin has led to a terrible tragedy. The Berlin authorities decided not to turn on the street lights at night. A boy died on Sulzfelder Strasse. How much longer can we try to save lives at the expense of the Germans? The German government urgently needs to address the country's internal problems before another tragedy strikes." Website imitates Das Bild <https://www.bild.de> by using the *fake* look-alike domain of <https://www.bild.vip>. Story is *false*.

Sources: <https://archive.ph/hhZ6s>
<https://dpa-factchecking.com/germany/220830-99-562173/>

Example 2 – Fake news website from foreign government imitating Der Spiegel



Headline says: "While the Germans Live in Poverty, the Ministers Drink Champagne" The article concludes: "*While the government spends its entire budget on Ukraine, it drinks champagne and enjoys life. The Ukrainians make fun of us. Stop supporting these freeloaders.*" Website imitates Der Spiegel <https://www.spiegel.de> by using the fake look-alike domain of <https://video.spiegelr.today>. Story is false.

Sources: <https://dpa-factchecking.com/germany/220831-99-580276/>
<https://web.archive.org/web/20220819115852/https://video.spiegelr.today/article/0108OKGCS.html>

D. What are the elements of a successful “user friendly UI”

To be successful, a new identity UI must have the following elements:

- ✓ It must be simple, and easy for consumers to understand
- ✓ It must have a single meaning (not used for other purposes)
- ✓ It must be easy for consumers to obtain further website identity information if they want it (e.g., by clicking or hovering over the identity symbol)
- ✓ It must be easy to explain through user education - and browsers, QTSPs, and governments must cooperate on a program of user education
- ✓ It must work equally well in mobile, tablet, and desktop environments with a variety of displays and font sizes
- ✓ It must be substantially common and consistent across all browsers, and not be constantly changing.

Conclusion:

MEPs should support eIDAS Article 45.2 and the new browser “user friendly UI”.

The European Signature Dialog asks all MEPs to strongly support the new Article 45.2 user friendly UI requirement so that EU citizens can enforce their “right to know” who they are dealing with under GDPR, and can assert their EU “digital sovereignty” over non-EU big-tech companies who operate here.

For more information, contact:

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