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Saadetud: 29.01.2024 11:52
Adressaat: SiM info <info@siseministeerium.ee>
Teema: Bolt: inquiry about identification documents

TÄHELEPANU! Tegemist on väljastpoolt asutust saabunud kirjaga. Tundmatu saatja korral palumelinke ja faile mitte avada!

Dear Sir/Madam,

We are reaching out to seek your guidance regarding the matter outlined below.

In light of the Digital Service Act (the DSA), Bolt, as a platform operator, is required to conduct a thorough identification of drivers registering on the Bolt platform.

In light of the above, we are seeking confirmation on whether we can utilize a driver's license as an identification document in Estonia to fulfill the necessary driver identification under the DSA. Additionally, can we rely on a driver's license issued by other EU member states and countries outside of the EU?

From an operational standpoint, relying on driver's licenses would be more efficient and would limit data processing under the GDPR, as we would not collect IDs and/or passport copies in addition to a driver's license.

We have taken note that a driver's license is not explicitly listed in clause 2(2) of the Identity Documents Act. However, driver's licenses do satisfy the criteria outlined in clause 4(1) of the Act, which states that:

"An Estonian citizen or an alien may also prove his or her identity with a valid document not specified in this Act if the name, photograph or facial image, signature or image of signature and date of birth or personal identification code of the holder are entered therein".

Thus, our presumption is that we should be permitted to rely on a driver's license as an identity document in Estonia.

We eagerly await your response.

Best regards,
Elina

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