

29 March 2021



Imad Malhas

Co-founder and CEO, IrisGuard

cc H.E. Karim Kawar, co-founder and Chair, IrisGuard

cc Tony Knight, Finance and Compliance Director, IrisGuard

Dear Mr. Malhas,

We are writing to inquire about the [iris scan technology](#) which IrisGuard provides to the World Food Programme (WFP) and the UN High Commissioner for Refugees (UNHCR). As we understand, your technology is being used in Zaatari and Azraq refugee camps in Jordan to allow refugees to buy groceries from stores, receive cash payments, among other purposes.

We have come across [reports](#) regarding data protection issues related to the use of this technology, suggesting the absence of meaningful consent and a lack of information about the privacy policy that applies to the use of your technology.

At Access Now, we defend and extend the human rights of users at risk. We seek to advance laws and policies to ensure the protection of users' fundamental rights, including privacy and data protection. Companies' products, applications, and services often gather an enormous amount of data from and about users and their surroundings. We seek to ensure that people remain in control of their personal information, that their data rights are protected and enforced, and that companies process only as much personal data as they need for their product to function, in line with the principles of necessity and proportionality. Private companies carry a responsibility to respect and promote users' rights, beyond complying with local law, and IrisGuard is no exception. From our vantage point, the need for transparency and accountability compounds when serving those forcibly displaced and struggling to exercise their fundamental rights.

In this context, the lack of information regarding the privacy protections that will apply to the use of iris scans and the collection of biometric data is concerning. Without a clear privacy policy, the individuals identified by your tools have no indication of what steps are being taken to ensure that their personal data is secure. Furthermore, because of the heightened vulnerability of the population subjected to the use of your technology, and the immutable nature of biometric indicators, great risks to a range of human rights persist. Necessitating the receipt of crucial humanitarian assistance on the provision of biometric data poses a grave power imbalance. Refugees are forced to choose between giving up deeply sensitive biometric data and receiving food and financial assistance.

In light of the above, we ask you to provide us with answers to the following questions:

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- **Did IrisGuard conduct any human rights due diligence or review to identify the potential privacy and security risks of connecting biometric data to the receipt of social services? What steps were taken to mitigate or prevent these risks?**

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- **Did IrisGuard conduct a data protection impact assessment pursuant to Article 35 of the EU General Data Protection Regulation prior to the deployment of this product? If so, please provide access to this DPIA. If not, why not?**
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- **Is there a privacy policy specific to iris scan payment system? Is it available in the native languages of refugees? How are refugees informed about it?**
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- **In addition to the iris scan, are there any other biometric data collected? Does the product collect or otherwise process other personal data? Where is the collected data stored and processed?**
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- **Who is authorized or can be authorized to access the database of the iris scan payment system or request disclosure or processing of retained data? Will the data be shared with any other entities besides UNHCR and WFP?**
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- **Will the data you collect be used for any other purpose other than identity verification of individuals to access food and other humanitarian services?**
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- **What measures have you taken to ensure the security of the information you are collecting on individuals?**
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- **Do you regularly undertake human rights due diligence on your products and services? Are the results made public? Do you regularly report on your human rights impacts, as through transparency reports, and participate in remedial processes to redress human rights harms you may cause or contribute to?**
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We are glad to speak with you at your convenience and look forward to receiving answers to these questions in writing by **April 12, 2021**.

Signed,
Access Now

For more Information, please contact:

Peter Micek | General Counsel | peter@accessnow.org
Marwa Fatafta | MENA Policy Manager | marwa@accessnow.org
Isedua Oribhabor | US Policy Analyst | isedua@accessnow.org