

21 Oct 2020



The UNHCR Representation in Jordan

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Re: Collection of biometric data in refugee camps in Jordan

We are writing to inquire about the [iris scan payment technology](#) which was introduced by the World Food Programme (WFP) in partnership with the UN High Commissioner for Refugees (UNHCR) in 2016 in Zaatari and Azraq refugee camps in Jordan then expanded to other camps and mobile centers to allow refugees to buy groceries from stores.

We have come across [reports](#) regarding data protection issues related to the use of this technology, mainly due to the absence of consent and lack of information about the privacy policy when enrolling refugees in the iris scan payment system which seem to be in violation of the [UNHCR privacy policy](#).

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. One of the main areas of our work is data protection in the digital age. We seek to ensure that people remain in control of their personal information, that their data rights are enforced, and that organizations and companies process only as much personal data as they need for their product or services to function.

So far, there is no evidence that the iris scan system used at the refugee camps is necessary to deliver food to people and other, less intrusive, mechanisms could be used. Furthermore, there is no detailed information regarding the privacy protections that will apply to the use of iris scans and the collection of biometric data or any steps you have taken to identify and

mitigate privacy risks that could arise. In light of the above, we ask you to provide us with answers to the following questions:

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- **What is the specific entity responsible for enrolling refugees in the iris scan payment system?**
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- **How is the refugees' consent to enroll in the iris scan payment system confirmed?**
 - Note that given the power imbalance between refugees and entities deploying the iris scan, it is unclear how this consent could be freely given. The inherent **interference** with people's privacy and data rights resulting from the use of such mechanisms collecting biometric data means that they should not be used to grant access to basic needs should not be used.
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- **Is there a privacy policy specific to iris scan payment system and how are refugees informed about it?**
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- **Is there an opt-out option and what are the alternative options for refugees to receive food assistance?**
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- **How many refugees are currently using the iris scan payment system?**
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- **In addition to the iris scan, are there any other biometric data collected?**
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- **Where is the collected data stored?**
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- **Who is authorized or can be authorized to access the database of the iris scan payment system?**
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- **How did WFP and UNHCR select the private company IrisGuard to provide the technology? Can you describe the selection process?**
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- **Have the WFP and UNHCR requested or conducted an independent security and privacy audit or a human rights impact assessment of the IrisGuard technology before selecting the technology developed by the company?**
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- **How do you believe Irisguard is sustaining the costs of providing you the iris scan payment technology?**
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We recognize that new technologies might help facilitate easier and more effective access to humanitarian aid among marginalized and vulnerable communities. However, these technologies can equally hamper the fundamental rights of individuals and communities and expose them to further risks.

To mitigate these impacts in a manner that respects human rights, **we would greatly appreciate your response by Monday, 2 November** and look forward to receiving any other information you consider to be relevant. We would also welcome the opportunity to engage with you on the protection of personal data of refugees and vulnerable communities.

Thank you,

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