

Tunis, 16 December, 2022

**Attn. Mr Nizar Ben Naji**

Minister of Communication Technologies, Republic of Tunisia

**Object:** Questions about Tunisia's Mobile Digital Identity Program (Mobile ID)

Your Excellency,

We, the undersigned organisations and associations, are writing to ask you several questions about the Tunisian Government's Mobile Digital Identity program (Mobile ID), launched on August 3, 2022, as part of a pilot project lasting until the end of 2022.


As you know, the Mobile ID project is connected to several electronic platforms, including:

- The [www.e-houwiya.tn](http://www.e-houwiya.tn) and [www.mobile-id.tn](http://www.mobile-id.tn) websites, for Mobile ID requests;
- The [TN Mobile-ID: E-Houwiya](#) app, for Mobile ID management;
- The [www.e-bawaba.tn](http://www.e-bawaba.tn) website, for official electronic documents and digital administrative services provision; and
- The [e-barid.tn](http://e-barid.tn) platform, which provides citizens with an official email address to communicate with government and public institutions.

We expect more websites and apps based on the Mobile ID to be introduced in the future. The services provided by these multiple platforms involve collecting and processing large amounts of sensitive data, which creates technical and legal challenges. Proactive impact assessment studies should be conducted to evaluate threats and risks to users' digital safety and personal data. Ensuring high levels of protection and efficiency for users, while maintaining service quality, requires large budgets and significant resources. Without all of these components, citizens' fundamental rights will be adversely impacted, with their personal data and legal identities potentially exposed to exploitation, hacking or fraud, which occurred when similar systems were deployed in other countries around the world like [India](#) and [Argentina](#).

We are concerned that such programs may deepen social inequalities and increase digital exclusion, rather than inclusion and integration, among vulnerable groups who lack the relevant skills, tools, and resources – such as internet access or smartphone ownership – to benefit fully from digital administrative services.

We also want to highlight this program's risks, given Tunisia's already fragile legal framework on personal data protection. [Organic Law 63/2004 dated July 27th, 2004 on Personal Data Protection](#) is outdated and does not align with the most recent social and technological transformations, nor with Tunisia's commitments to the Council of Europe's [Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data](#) (Treaty No. 108) and [its additional protocol 181](#),



which Tunisia ratified in [May 2017](#). We are also worried about the lack of personal data protection culture among [State authorities, public bodies](#), and [private companies](#).


To inform the general public about the Mobile ID program's impact on their personal data protection and privacy, and their ability to access basic administrative services, we would therefore like to ask you the following questions:

1. Can you provide us with a list of the personal data collected and processed by the different websites and apps requiring a Mobile ID to use their services?
2. What internationally recognised digital security standards were used as the basis for developing the various Mobile ID infrastructures, websites, and apps?
3. Before launching the project, did you conduct any impact assessments to evaluate the possible digital security and data protection risks of using these same infrastructures, websites, and apps? If so, will the results of these assessments be published, mentioning which institution(s) conducted them?
4. What was the allocated budget for this program and where does it come from?
5. Which institution(s) manage the Mobile ID database?
6. Which institution(s) can access the Mobile ID database?
7. Has the Mobile ID database been shared with any private companies? If so, which ones?
8. Has the Mobile ID database been shared with any foreign or UN actors, in the framework of bilateral conventions and international treaties ratified by the Tunisian State? If so, which actors?
9. Which company or institution developed the "TN Mobile-ID: E-Houwiya" app for Mobile ID management?
10. Which permissions does the "TN Mobile-ID: E-Houwiya" app require when installed on mobile devices?
11. What changes can the app make on a user's device? To what extent, if any, do these changes affect the files' system, battery consumption, or internet access?
12. Why is the app only available on Android and not in the Apple App Store?

Given that the pilot phase is about to end soon, we look forward to receiving your answers to these questions. Should you wish to meet on this topic, we remain at your disposal. We are also open to consulting with Tunisian official bodies and authorities on programs and projects directly impacting Tunisians' fundamental rights, based on a participatory approach involving experts, organisations, and civil society.

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**Signed by:**

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- Access Now
  - The Tunisian Forum for Social and Economic Rights (FTDES)
  - Tunisian League of Human Rights (LTDH)
  - Al Bawsala
  - Avocats Sans Frontières (ASF)