

Date

6 August 2025

Official Memorandum

Subject

Provision of information for the debate in the House of Representatives on the situation in Gaza

The House of Representatives will return from recess on Thursday 7 August 2025 in connection with [a debate](#) on the current situation in Gaza. In this regard, the Minister of Foreign Affairs informed the House of Representatives on 28 July by means of [a letter](#) regarding agreements with Israel on accountability for the situation in Gaza. Through this official memorandum, the Autoriteit Persoonsgegevens (AP), the Dutch data protection authority, provides the Ministry of Foreign Affairs with relevant information in response to the aforementioned letter and in preparation for the debate.

Excerpt from letter of Minister Veldkamp (Foreign Affairs)

"In response to mounting pressure to alleviate humanitarian needs in the Gaza Strip, on 26 July Israel announced that it would implement temporary measures (including cessation of hostilities and safe routes) to facilitate improved import and distribution of humanitarian aid. Israel also announced that it would open airspace for food drops over the strip. It is important that Israel immediately matches its words with deeds and takes measures that will lead to substantial and rapid improvement of the humanitarian situation throughout the Gaza Strip. It is also crucial that the announced expansion of humanitarian access is permanent. For this reason, the Netherlands continues to urge the Israeli authorities to further expand and consolidate humanitarian access to the entire Gaza Strip. The Netherlands continues to emphasise that the delivery of aid should be carried out by professional mandated organisations."

Relevant information AP in respect of the above

The AP is familiar with the concerns of the government, the House of Representatives and signals from Dutch aid organisations about access to humanitarian aid in the Gaza Strip. In this context, the AP points to the real risk that the deployment of Dutch aid organisations will have to be terminated as of 9 September 2025 in connection with new registration requirements under Israeli guidelines, which cannot be met by Dutch or European aid organisations due to privacy reasons. NOS also covered this [in its news report](#) on 29 July 2025.²

Due to the risks to the fundamental rights and rights of individuals, including the right to protection of personal data, associated with these registration requirements, a Dutch aid organisation has requested the AP to issue an emergency opinion on the required provision of personal data to the Israeli government for the renewal of their registration that allows them to provide humanitarian aid in the occupied Palestinian territories. This is in view of the significant, acute risks to the continuity of humanitarian aid on the ground.

¹ [Government letter on agreements with Israel on accountability for the situation in Gaza](#), 28 July 2025, 2025Z14936

² [Aid organisations feel cornered by new registration requirement Israel](#), NOS news, 29 July 2025

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Identified privacy risks in registration requirements

The responsible Israeli Ministry for Diaspora Affairs and Combating Antisemitism requires a multitude of diverse data on both Dutch and local Palestinian employees and their family members, as well as information on donors of the aid organisation, for the issuance of the new registration. Moreover, foreign employees are required to obtain a positive recommendation for their registration. To this end, sensitive data must be provided, including CVs, passport copies, Certificate of Good Behaviour (VOG) and marital status. The information must be submitted via the website of the responsible ministry. This places the data irrevocably outside the sphere of influence of the supplying aid organisations, as a result of which verification is no longer possible.

It is apparent from the explanation of the registration requirements by the Israeli government, that once received, the information will be used in screening processes and profiling by the Israeli government in a non-transparent manner. Any statements about dignitaries or particular criticisms of the state of Israel, published photos, online appeals, memes or past views may be matched with the information obtained for registration. As a result, individual employees or the organisation as a whole may be permanently excluded from re-registration on highly questionable grounds. Within this context and based on the information provided to us by the aid organisation, the AP expects the data sharing to be unlawful and that the transfer could lead to serious security risks for aid workers (and their families) on the ground.

As a result, aid organisations are put in an impossible position as employers. The consequences of failure to comply with the registration requirements are also immensely far-reaching from a humanitarian perspective. Failure to comply with these guidelines in the very short term will inevitably lead to the cancellation of current worker registrations, and aid organisations will be obliged to withdraw from the West Bank, Gaza and Israel. As such, the situation is extremely serious and urgent, both for aid workers and people in the areas where aid is being delivered.

In light of the above, the AP requests the Ministry of Foreign Affairs to file a formal protest to the Israeli government about these *“Guidelines for the Registration of Organisations and Issuance of Recommendations for Their Foreign Employees”*. In addition, the AP requests the Ministry to take this matter to the European Commission, as these guidelines affect not only Dutch but also other European aid organisations. In addition, the AP will contact its Israeli counterpart, the Israeli Privacy Protection Authority, and independently share the request to adjust the registration requirements. In the very short term, the AP will also enter into discussions with its European counterparts in the European Data Protection Board on how these registration requirements relate to the required “adequate level of data protection in national law” as set out in the adequacy decision between the EU and Israel.³ This adequacy decision currently provides the legal basis for lawful international transfers of personal data between countries in the European Economic Area (EEA) and the State of Israel.

³ (2011/61/EU) COMMISSION DECISION of 31 January 2011 pursuant to Directive 95/46/EC of the European Parliament and of the Council on the adequate protection of personal data by the State of Israel with respect to automated processing of personal data