

Anu Talus

Chair of the European Data Protection Board

Commissioner Michael McGrath
Commissioner for Democracy,
Justice, the Rule of Law and
Consumer Protection
European Commission
1040 Brussels, Belgium

Commissioner Hadja Lahbib
Commissioner for
Preparedness and Crisis
Management
European Commission
1040 Brussels, Belgium

Brussels, 20 April 2026

Subject: Concerns on Israel's registration requirements imposed on NGOs

Dear Commissioner McGrath,

Dear Commissioner Lahbib,

Several non-governmental organisations ("NGOs") based in the EEA subject to the GDPR have reached out to various data protection authorities in the EEA¹ and to the EDPB, thereby raising the EDPB's awareness of a recent legislative change implemented by the State of Israel. The Israeli Guidelines for the Registration of Organisations and Issuance of Recommendations for the Foreign Employees ("Guidelines") are directed at the NGOs providing humanitarian aid in the Palestinian Territories, which require them to submit a significant amount of personal data of their staff, including the personal data of their spouses and children.² Further, the NGOs are required to provide a list of their donors, including their "background" information.³

¹ Ahead of a hearing before the Israeli High Court on 23 March 2026, several NGOs and civil society organisations contacted various EU institutions and data protection authorities in the EEA to highlight the urgent need for support on the matter.

² The Guidelines require NGOs to submit, among others, CVs, copies of passport, certification of good conduct, marital status, as well as personal data relating to their spouses and children.

The Guidelines for the Registration of Organisations and Issuance of Recommendation for the Foreign Employees, [International Non-Governmental Organizations Primarily Engaged in Activities with Palestinian Residents for the Purpose of Humanitarian Aid The Ministry for Diaspora Affairs and Combating Antisemitism](#), Art.5(2)

³ Ibid, Art.8. The Guidelines require NGOs to provide a list of their donors, including their names, not further defined "background information" and the exact amount of donation made.

The implementation of such Guidelines may pose several issues for NGOs, for instance in relation to the following principles and requirements:

- the need to ensure the proportionality, necessity and transparency of such processing activities.
- the need for a valid legal basis for such processing activities as imposed by Article 6 GDPR;
- the need to ensure that data subjects may exercise their rights.

In addition, NGOs subject to the GDPR need to comply with the rules and conditions set out in Chapter V of the GDPR. As the State of Israel benefits from an adequacy decision as foreseen in Article 45 of the GDPR and as the European Commission has a specific monitoring duty under such decisions, the EDPB would be grateful if you could indicate:

- whether the European Commission considers that such flows of data from NGOs to competent authorities in Israel would fall within the scope of the adequacy decision adopted for Israel;
- if this is the case, whether the European Commission has taken, or plans to take, any action in this regard, as the implementation of this Israeli legislative change may possibly undermine the principles enshrined by the GDPR.

The EDPB would be willing to cooperate with your services on this matter, in case you would find it appropriate.

The EDPB remains at your disposal for any further exchanges on this matter.

Yours sincerely,

Anu Talus