



**GPA**

Global Privacy Assembly

# Working Group on the Role of Personal Data Protection in International Development Aid, International Humanitarian Aid and Crisis Management

**Report – July 2025**

**Federal Data Protection and Information  
Commissioner (FDPIC), Switzerland**

**Personal Data Protection Authority (APDP), Monaco**

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## Executive Summary

In its fifth year of existence, the Working Group on the Role of Personal Data Protection in International Development Aid, International Humanitarian Aid and Crisis Management (the “WG AID”) has focused its energy on adapting its work plan 2025 in line the [strategic priorities](#) of the Global Privacy Assembly (the “GPA”). The priorities updated are those specifically relating to the advancement of privacy protection worldwide, activities related to the 10th anniversary of data protection in humanitarian action, updating the geographical and thematic mapping of relevant actors and the contact points within Data Protection Authorities (“DPAs”) on the African continent and the strengthening of relations with other international bodies and networks that advance data protection and privacy issues.

In conformity with the objectives of [the Resolution on the Role of Personal Data Protection in International Development Assistance, International Humanitarian Assistance and Crisis Management](#) (“the Resolution”), the members of the WG AID have pursued the following general goals:

- To respond to the request for cooperation from relevant parties to develop guidelines and share best practices in privacy and data protection relating to international development assistance and international humanitarian action.
- To develop an advocacy and engagement strategy with relevant stakeholders.

In order to achieve these two goals, the WG AID has carried out the following activities:

- Establish sustained contacts with the relevant actors, both at bilateral and multilateral levels, and thus, maximise the reach of the GPA's voice by strengthening the relations with the actors of international development aid, for instance International Non-Governmental Organisations (“INGOs”), including Terre des hommes and Doctors Without Borders.
- Promote and facilitate the integration of international development or humanitarian aid recipient countries (hereafter ‘recipient countries’) that benefit from these activities but do not have data protection and privacy legislation into the global data protection and privacy community.

This has included various initiatives such as updating the mapping of international development assistance and international humanitarian assistance, as well as identifying the recipient countries benefiting from these activities that do not have legislation on data protection and privacy.

The WG AID also focused its efforts on:

- Activities related to the 10th anniversary of data protection in humanitarian action, which will culminate in the publication of a book entitled *“Data Protection in Humanitarian Action: Responding to Crises in a Data-Driven World”*.

- The organisation of bilateral meetings with relevant players with a view to future collaboration.
- The initiation of awareness-raising documents.
- The external promotion of the GPA and the WG AID.
- Participation in meetings with development agencies, in particular the working group of data protection officers of the Association of European Development Financing Institutions.

The WG AID has consequently strengthened its presence with relevant actors at bilateral and multilateral levels in order to maximize the reach of the GPA's voice.

All these actions have been undertaken to contribute to building a global privacy community committed to high standards of protection of individuals' privacy, particularly for those who are beneficiaries of international development or humanitarian aid programmes and are particularly vulnerable.

## Introduction

The WG AID was established by the [Resolution](#) during the 42<sup>nd</sup> GPA. It is consistent with initiatives introduced at the 2011 Conference in Mexico City on [Data Protection and Major Natural Disasters](#), and in 2015 in Amsterdam on [Privacy and International Humanitarian Action](#). This resolution promotes the objectives of the GPA's Policy Strategy (then in force at the 42<sup>nd</sup> GPA)– specifically those relating to the advancement of privacy protection worldwide, the strengthening of relations with other international bodies and networks that advance data protection and privacy issues, (including through agreements with observer bodies and those relating to human rights and social protection and democratic rights.)

The WG AID is composed of the following members:

- Argentina, Agencia de Acceso a la Información Pública (**AAIP**)
- Association francophone des Autorités de protection des données personnelles (**AFAPDP**)
- Benin, Commission Nationale de l'Informatique et des Libertés (**CNIL**)
- Burkina Faso, Commission de l'Informatique et des libertés (**CIL**)
- Côte d'Ivoire, Telecommunications/ICT Regulatory Body (**ARTCI**)
- Council of Europe, Consultative Committee of the Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data (**T-PD**)
- Council of Europe, **DP Commissioner CoE**
- Croatia, Data Protection Agency (**AZOP**)
- European Data Protection Supervisor (**EDPS**)
- Gabon, Commission Nationale pour la Protection des Données à Caractère Personnel (**CNPDCP**)
- Georgia, Personal Data Protection Service (**PDPS**)
- Germany, Bundesbeauftragte für den Datenschutz und die Informationsfreiheit (**BfDI**)
- Gibraltar, Data Protection Commissioner (**GRA**)
- International Committee of the Red Cross (**ICRC**)
- International Organization for Migration (**IOM**)
- Jersey, Office of the Information Commissioner (**JOIC**)
- Kenya, Office of the Data Protection Commissioner (**ODPC**)
- Kosovo, National Agency for Personal Data Protection (**IPA**)
- Luxembourg, National Commission for Data Protection (**CNPD**)
- Mexico, Instituto Nacional de Transparencia, Acceso a la Información y Protección de Datos Personales (**INAI**)
- Mexico, Instituto de Transparencia de Acceso a la Información y de Protección de Datos Personales del Estado de Tamaulipas (**ITAIT**)
- Netherlands, Autoriteit Persoonsgegevens (**AP**)
- Niger, Haute Autorité de Protection des Données à caractère Personnel (**HAPDP**)
- Principauté de Monaco, Autorité de protection des données personnelles (**APDP**) – **Co-Chair**
- Portugal, Comissão Nacional de Protecção de Dados (**CNPD**)
- Senegal, Commission de Protection des Données Personnelles (**CDP**)
- Special Rapporteur on the Right to Privacy of the UN
- Switzerland, Federal Data Protection and Information Commissioner (**FDPIC**) - **Chair**

- New Zealand, Office of the Privacy Commissioner (**OPC**)
- Organisation of Economic Cooperation and Development (**OECD**)
- United Nations High Commissioner for Refugees (**UNHCR**)
- World Food Programme (**WFP**)

The composition of the WG AID reflects the geographical diversity of the GPA and the WG AID is delighted with the steady increase in its membership, which now stands at 32 (including observers).

In 2025, the WG, as a whole, met twice (January and July) via videoconference.

During these meetings, the WG AID has:

- Adopted its Work Plan 2025 (See [Annex 1](#)).
- Updated the geographical and thematic mapping of relevant actors and current programmes, which has also allowed the identification of the recipient countries benefiting from these activities that do not have legislation on data protection and privacy (See [Annex 2](#)).
- Updated the list of contact points within DPAs on the African continent (See [Annex 3](#)).
- Discussed the terms of the WG AID's participation in the celebration of 10 years of data protection in humanitarian action. This resulted in the drafting of a chapter for the book *"Data Protection in Humanitarian Action: Responding to Crises in a Data-Driven World."*

In April 2025, the President and Vice-President met in Monaco to draft the chapter entitled "*Data protection, Humanitarian Action and Global Regulatory Cooperation: the Role of the Global Privacy Assembly*" which will be included in the book published for the 10th anniversary of data protection in humanitarian action. They also prepared, via videoconference, the panel discussion 'How privacy can save lives' which the WG AID organised during the Venice Symposium in May 2025.

## Working Group Activities

In conformity with the Resolution, the members of the WG AID have set themselves the following general goals:

- To respond to the request for cooperation from relevant parties to develop guidelines and share best practices in privacy and data protection relating to international development assistance and international humanitarian action.
- To develop an advocacy and engagement strategy with relevant stakeholders.

In order to achieve these two goals, the WG AID decided to implement the following activities:

- Continue to refine its understanding of international development aid, international humanitarian aid and crisis management.
- Establish sustained contacts with the relevant actors (international organisations, non-governmental organisations, development agencies, geographic networks, etc.), both at bilateral and multilateral levels and thus maximise the reach of the GPA's voice by strengthening the relations with the actors of international development aid.
- Alone or in collaboration with other relevant Working Groups of the GPA, produce documents and advocacy tools for better consideration of data protection and privacy by those working in the field with vulnerable communities (e.g., drawing up lists of contact points by geographical area, preparing a series of webinars).
- Promote and facilitate the integration of recipient countries that benefit from these activities but do not have legislation on data protection and privacy into the global data protection and privacy community.

In 2025, the WG AID as a whole met twice via videoconference and conducted the following activities:

1. **Adoption of its Work Plan 2023-2025** (see [Annex 1](#))
2. **Updated the Geographical and Thematic Mapping of Relevant Actors** (see [Annex 2](#))

From an operational standpoint, this mapping aims to identify a series of relevant actors in terms of development aid and humanitarian aid.

Forty-five (45) countries that do not yet have data protection legislation in place as of July 10<sup>th</sup> 2025 were identified. However, a growing number of countries (14) have drafted legislation, including Guinea-Bissau, the Maldives and Vanuatu.

Nine countries (9) have been added to the list of countries that have recently adopted data protection legislation since the last report: Brunei, Cameroon, El Salvador, Grenada, Jordan, Kiribati, Malawi, Saint Kitts and Nevis and Syria.

### 3. Activities related to the 10 years of data protection in humanitarian action

In 2015, ten years ago, the Directorate of the International Committee of the Red Cross (the “ICRC”) adopted its first comprehensive Rules on Personal Data Protection. In the same year, the Office of the United Nations High Commissioner for Refugees (the “UNHCR”) also adopted its own regulatory framework on personal data protection with the introduction of its Policy on the Protection of Personal Data of Persons of Concern to UNHCR. Also in 2015, the GPA, then the International Conference of Data Protection and Privacy Commissioners [ICDPPC] adopted the Resolution on Privacy and International Humanitarian Action, marking the first-time humanitarian action was formally recognised within a global forum of data protection and privacy regulators.

As 2025 marks a significant milestone for personal data protection in humanitarian action, the ICRC DPO, UNHCR DPO, and the GPA are collaborating on the writing of a book “*Data Protection in Humanitarian Action: 10 Years of Humanitarian Action in a Digital Age*” with Routledge as a publisher. It will explore how the past decade of data protection frameworks, partnerships, and evolving practices have contributed to the evolution of the humanitarian sector, shaped discussions relating to the responsible use of technologies, and responsible digital transformation, and informed the evolving analysis of protection and assistance needs of affected persons. Scholars, practitioners, and experts are contributing on a wide range of topics that highlight the critical importance of data protection in humanitarian contexts. It will be published in December 2025.

The WG AID drafted a chapter (*Data protection, Humanitarian Action and Global Regulatory Cooperation: the Role of the Global Privacy Assembly*), the abstract of which reads as follows:

*“As digital technologies increasingly shape humanitarian operations, the protection of personal data has become a central concern in crisis settings. This chapter examines the evolving role of the Global Privacy Assembly (GPA) in advancing regulatory convergence in data protection, particularly through its engagement with international organisations operating in humanitarian contexts. While GPA resolutions, working groups, and observer arrangements reflect a growing commitment to cross-sector collaboration, questions remain about the Assembly’s practical influence, the coherence of enforcement efforts, and the reach of its capacity-building initiatives. This chapter assesses the GPA’s contributions and limitations, with a particular focus on its support for humanitarian data protection through a dedicated working group, the Working Group on the Role of Personal Data Protection in International Development Aid, International Humanitarian Aid and Crisis Management (WG AID), and outlines future directions for enhancing global regulatory cooperation in the area of humanitarian action.”*

### 4. Update of the list of contact points within DPAs on the African continent (See [Annex 3](#))

At the request of several respondents to the questionnaire, a list of African countries with a personal data protection law and a data protection authority has been drawn up, with contact points within the authorities.

## 5. Official endorsement of the 3rd edition of the ICRC handbook and translations verification

Following the WG AID's collaboration with the ICRC on the Handbook on Data Protection in Humanitarian Action, the Exco has officially given its endorsement to the third edition of the handbook, which was presented at the closed session of the GPA in Jersey. Several members of the WG AID and the GPA reviewed the translation of the manual into their respective languages; the manual will soon be available in Arabic, Spanish, French and Russian. A Korean version is also being finalised for the next GPA to be held in Seoul.

## 6. Promotion of the work of the GPA and the WG AID

The Chair and some members of the WG AID participated in various meetings, conferences and training relevant to the objectives of the WG AID with external stakeholders in order to maintain and explore possible synergies, (such as [DigitHarium](#), the [World Bank Group](#), the [International Organisation of la Francophonie](#), the working group of data protection officers of the association of European development finance institutions and a private meeting with the UN Special Rapporteur on the right to privacy (Dr. Ana Brian Nougrères).

The following activities were carried out, in particular:

- GPA participation in St. Helier, Jersey: presentation of the WG AID 's work during the closed session as well as participation in a panel dedicated to promoting the third edition of the handbook, with the participation of the ICRC, the UNHCR, and the Kenyan and Swiss data protection authorities.
- Continuation of the work initiated in 2015 with the ICRC by participating in the "Community of Practice" online sessions launched in 2024 to enable participants of the [Data Protection Officer in Humanitarian Action certification course with the University of Maastricht](#) to keep in touch and discuss current issues. Regular contributions to courses are envisaged.
- The Chair of the WG AID met with the UN Special Rapporteur on the Right to Privacy (Dr. Ana Brian Nougreres) in Geneva in December 2024.
- The WG AID has organised a panel on data protection in humanitarian action for the fourth edition of the [Privacy Symposium](#) held in Venice in May 2025. The symposium aims to promote international dialogue, cooperation and knowledge sharing on data protection regulations, compliance and emerging technologies. This panel, entitled 'How Privacy Can Save your Life?', moderated by the APDP, brought together representatives from the World Food Programme (WFP), the ICRC, the United Nations High Commissioner for Refugees (UNHCR) and the Dutch and Swiss DPAs. In humanitarian contexts, the processing of personal data of the world's most vulnerable people, living in fragile or conflict-affected countries, can have serious consequences. This is why privacy and data protection risks have a different dimension for actors on the ground, which goes beyond compliance. These are moral imperatives, deeply rooted in humanitarian principles, as they can lead to:

- physical harm or threats to personal safety
  - discrimination, exclusion or lack of assistance;
  - social stigmatisation, political persecution or manipulation.
- Members of the WG AID also took part in various exchanges with national development agencies. In particular, contacts were established with the working group of DPOs of the Association of European Development Financing Institutions. Tri-annual online meetings are now organised. The DPOs of these institutions have identified the AID WG as a pool of experts in this field and wish to share with it their initiatives (such as the [Digital Rights Check](#) tool, and the difficulties they encounter in keeping up to date with new data protection legislation, in order to obtain advice and guidance.
  - The WG AID has joined forces with other GPA working groups to explore joint actions.

N.B All the working documents were drafted in French and then translated into English thanks to l'autorité de protection des données personnelles (APDP) and the Association francophone des autorités de protection des données personnelles (AFAPDP). The English versions were then reviewed by the Gibraltar data protection (GRA) authority.

## Work Plan 2025-2026

The work of the WG AID will focus on the advancement of privacy protection worldwide and the promotion of high data protection standards as stated in the GPA strategic priorities [2023-2025](#), which have been reaffirmed in the [Resolution on the Assembly's Strategic Direction \(2021-23\)](#). It will also work towards maximising the GPA's voice and influence by strengthening relations with other international bodies and networks.

To this end, the WG AID intends to focus essentially on the following objectives:

- Adapt its Work Plan.
- keep the mapping and the list of contact points up to date.
- Maintaining and exploring possible synergies with other WGs and external stakeholders, in particular INGOs that have requested it and development agencies.
- Continue to promote the work of the GPA and the WG AID by actively participating in various meetings, conferences, and training related to the objectives of the WG AID with external stakeholders in order to maintain and continue to explore possible synergies. Given that Asia is not yet represented on the WG AID and that the 2025 GPA will be held in South Korea, additional efforts will be made to establish contacts with data protection authorities on that continent.

## Conclusion

The WG AID welcomes the growing interest in its work and the numerous requests it receives to participate in initiatives such as the 10th anniversary of data protection in humanitarian action and the working group set up by the DPOs of development agencies. The WG AID is recognised as a pool of expertise by the organisations consulted and is regularly invited to participate in various events (conferences, workshops, etc.) at both national and international level. The analysis of the questionnaire also identified specific needs, enabling the WG AID to better target its activities.

The WG AID contributes to the implementation of the GPA's strategic priorities and policy, by continuing to pave the way to respond to requests for cooperation from relevant parties to develop guidelines and share best practices in privacy and data protection relating to international development assistance and international humanitarian action.

## Annexes

### Annex 1



**GPA**

Global Privacy Assembly

#### **Work plan 2025** of the Working Group on the Role of Personal Data Protection in International Development Aid, International Humanitarian Aid and Crisis management

### Context

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The Global Privacy Assembly (“GPA”) has the ambition to *“occupy an important place at a time when privacy is high on public agendas”* and to *“become a vehicle for effective regulatory cooperation and influence on the direction of policy on privacy and data protection globally”*<sup>1</sup>.

In the context of the implementation of the United Nations' Agenda 2030 (known as “**Agenda 2030**”) for sustainable development, the members of the GPA have noted in the **Resolution on the Role of Personal Data Protection in International Development Aid, International Humanitarian Aid and Crisis** (hereafter “**the Resolution**”) that *“there have been increases in international development assistance and international humanitarian aid, the number of stakeholders, and the complexity of the implementation of these programmes”*; that there is a need for *“greater accountability, transparency and effectiveness from development assistance agencies”*; and the increase of *“the processing of personal data [which] takes place in the context of the implementation of numerous international development aid programmes, in international humanitarian aid and in crisis management, particularly in the field of civil registration system and identification, on which 12 of the 17 sustainable development objectives are based”*<sup>2</sup>.

The closed session of the GPA there resolved to *“contribute, at its level, to the achievement of the Agenda 2030, by identifying and engaging relevant stakeholders in international development aid in order to achieve its longer-term strategic goal of a “global regulatory environment with high, clear and consistent standards of data protection”*”.

To this end, it has set up a Working Group on the Role of Personal Data Protection in International Development Aid, International Humanitarian Aid and Crisis management (hereafter “**the Working Group**” or “**the WG AID**”).

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<sup>1</sup> <http://globalprivacyassembly.org/wp-content/uploads/2019/10/Resolution-on-the-Conference-Strategic-Direction-2019-2021-FINAL.pdf>

<sup>2</sup> <https://globalprivacyassembly.org/wp-content/uploads/2020/10/FINAL-GPA-Resolution-International-Aid-EN.pdf>

## OBJECTIVES

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In line with the objectives of the Resolution, the members of the Working Group have set themselves the following general objectives:

- **to respond to the request for cooperation** from relevant parties to develop guidelines and share best practices in privacy and data protection relating to international development assistance and international humanitarian action.
- **to develop an advocacy and engagement strategy** with relevant stakeholders.

In order to achieve these two objectives, the Working Group must implement activities in order to:

- A.** Refine the understanding of international development aid, international humanitarian aid and crisis management.
- B.** Establish sustained contact with the relevant actors, both at bilateral and multilateral levels and thus maximise the reach of the GPA's voice by strengthening the relations with the actors of international development aid.
- C.** In collaboration with other relevant Working Groups of the GPA, produce documents and advocacy tools for better consideration of data protection and privacy in relevant activities.
- D.** Promote and facilitate, for the recipient countries benefiting from these activities that do not have legislation on data protection and privacy, their integration into the global data protection and privacy community.

This work plan includes the new actions of the operational plan of the [2023-2025 strategic plan](#):

- A.** Promote awareness campaigns on PDP in coordination with other organizations.
- B.** Produce joint actions with other organizations and networks that work on issues that are linked to PDP.
- C.** Produce a document that addresses the protection of personal data in vulnerable communities.

## PROPOSED WORK PLAN AND TIMETABLE

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<b>2025</b>	<p>Keep the mapping up to date (A, B and D).</p> <p>Promote the work of the GPA and this Working Group, in particular to international organisations, humanitarian organisations, development agencies as well as non-governmental organisations in order to facilitate the exchange of information (A, C, E and F).</p> <p><i>For instance, pursue the work with the International Committee of the Red Cross (“ICRC”) and the UNHCR; especially the 10 Years of Data Protection in Humanitarian Action Initiative</i></p> <p><i>This year, collaboration with development agencies will also be stepped up, as the AID WG has received numerous requests for cooperation.</i></p> <p>Explore synergies with other WGs of the GPA and other data protection networks (B, C, D and F).</p> <p>Organise a workshop/webinar bringing together the data protection community and development actors to discuss data protection issues and promote data protection in development aid (A, B, E and F). A first panel is already planned as part of the Venice Symposium in May 2025.</p> <p><i>For example, organise a thematic/practical exchange with a stakeholder or stakeholders and the WG AID member authorities.</i></p> <p>Start producing practical documentation for relevant stakeholders (C and G).</p> <p><i>For example, start producing standard data protection awareness presentations (PPT) for field officers; continue drawing up a list of specific contact points for these players within the data protection authorities; start producing documents for the operators responsible for running the programmes.</i></p> <p>Identify training opportunities and facilitate access to them for the relevant players (B and E).</p>
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## Annex 2



**GPA**

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### **Working Group on the Role of Personal Data Protection in International Development Aid, International Humanitarian Aid and Crisis management**

#### Mapping of International Development Aid and International Humanitarian Aid

10 July 2025 Version

In accordance with the work plan adopted by the working group on 26 January 2021, this document aims to:

- Refine the understanding of international development aid, international humanitarian aid and crisis management (objective A).
- Identify recipient countries benefiting from these activities that do not have legislation on data protection and privacy (objective D).

From an operational standpoint, the purpose of this mapping is to identify a series of relevant actors, in terms of development aid and humanitarian aid. Indeed, the 2021 work plan of the GT provides for the mailing of a questionnaire to said actors in order to better assess the practices in terms of personal data protection in the implementation of their programs/projects (see questionnaire).

#### 1. A wide range of actors

The research carried out by the working group revealed the complexity for an outsider to develop a concise overview of development assistance and humanitarian aid, as there are so many entities involved. The competencies of those development agencies and humanitarian organisations may furthermore come into collision.

It was decided to separate the main actors in the field of development into broad categories.

On the one hand, the main donors who do not intervene in the field in the implementation of programmes (in blue), and on the other hand the international organisations and operators (in yellow) who ensure this implementation.

N.B.: this distinction may be somewhat superficial, as some actors may have the dual role of "funder" and "operator" through, for example, internal agencies responsible for implementation.

In order to facilitate the reading of the document, bilateral cooperation and the work of civil society organisations (NGOs or other private entities) have not been taken into account.

Finally, the humanitarian actors whose action comprises specific aspects, are the subjects of a different classification (in green).

Development Agencies/DFIs
Argentina - White Helmets Commission (Comisión Cascos Blancos)
Austria - Austrian Development Agency – ADA; The Austrian Development Cooperation; Austria Wirtschaftsservice Gesellschaft (aws)
Azerbaijan - Azerbaijan International Development Agency
Belgium - Belgian Policy Plan for Development Cooperation; Belgian Technical Cooperation - BTC/CTB [nl]
Brazil - Agência Brasileira de Cooperação
Canada - Global Affairs
Chile - Agencia de Cooperación Internacional de Chile (AGCI)
China - China International Development Cooperation Agency (CIDCA)
Czech Republic - Czech Development Agency (CzDA)
Denmark - Danish International Development Agency (DANIDA)
Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ)
Egypt - Egyptian Agency for Partnership for Development
European Union - Directorate-General for International Partnerships
Finland - Department for International Development Cooperation (FINNIDA)
France - Agence française de développement
Iran - Organization for Investment, Economic, and Technical Assistance of Iran
Ireland - Irish Aid
Israel - Israel's Agency for International Development Cooperation
Italy – Italian Development Cooperation
Japan - Japan International Cooperation Agency (JICA)
Korea - Korea International Cooperation Agency (KOICA)
Kuwait - Kuwait Fund for Arab Economic Development
Liechtenstein - Liechtensteinische Entwicklungsdienst
Luxemburg - Lux Development
Mexico – AMEXCID

<b>NEPAD (African Union)</b>
Netherlands - The Netherlands Foreign Trade and Development Agency (NFTDA)
New Zealand - New Zealand Agency for International Development (NZAid)
Norway - Norwegian Agency for Development Cooperation (NORAD)
Pakistan - Pakistan Technical Assistance Programme
Palestine - Palestinian International Cooperation Agency (PICA)
Poland - The Development Co-operation Department
Portugal – IPAD
Portugal - Camões - Instituto da Cooperação e da Língua
Republic of China (Taiwan) - International Cooperation and Development Fund (ICDF)
Romania - Assistance for Development (AOD)
Russia - Rossotrudnichestvo (RU)
Saudi Arabia - Saudi Fund for Development (SFD)
Slovakia - Slovak Aid
South Africa - Development Bank of Southern Africa (DBSA)
Spain - Spanish Agency for International Development Cooperation (AECID)
Sweden - Swedish International Development Cooperation Agency (Sida)
Switzerland - Swiss Agency for Development and Cooperation (SDC)
Taiwan - International Cooperation and Development Fund (Taiwan ICDF)
Thailand - Thailand International Cooperation Agency (TICA)
Turkey - Turkish Cooperation and Coordination Agency (TİKA)
United Kingdom - Foreign, Commonwealth and Development Office (FCDO)
United States – formerly United States Agency for International Development (USAID), now State Department, the Inter-American Foundation (IAF), and the African Development Foundation (ADF)

<b>Financial Institutions</b>
ADB Asian Development Bank
AFDB African Development Bank
Black Sea Development Bank

CEB Council of Europe Development Bank
Central African Central Banks Association
EBRD European Bank for Reconstruction and Development
EDFI (European network of DFIs)
EIB European Investment Bank
IDB Inter-American Development
International Bank for Reconstruction and Development (World bank)
Islamic Development Bank
West African Development Bank
World Bank (Group)

<b>International Organisations</b>
African Union
Commonwealth
Council of Europe
European Union
ICRC
Organisation internationale de la Francophonie
Organization of American States
UN System (cf. <a href="#">un system chart.pdf</a> )

<b>Humanitarian</b>
CICR
UN system (HCR, IOM, WHO, WFP, OCHA, UNICEF...)
MSF
MDM
Première urgence

Secours populaire
Action contre la faim
Danish refugee Council
Norwegian refugee Council
OXFAM
ECHO (UE)
Save the Children
Plan International
Handicap International
Secours Islamique
Care
Solidarités International
ACTED
PRM (US)
International Medical Corps
International Rescue Committe
GAVI
Terre des Hommes
Global Fund

## 2. A wide range of topics

The main lines of action in terms of development aid (non-exhaustive):

- Education
- Health
- Nutrition, agriculture and access to drinking water
- Governance (including e-governance) and rule of law
- Infrastructures (including digital infrastructures)
- Migrations
- Environment/Ecology/Climate change
- Gender equality
- Economic development/Growth/Private sector
- 

The main lines of action in terms of humanitarian aid (non-exhaustive):

- Shelter/habitat
- Health/Hygiene
- Food assistance
- Forced displacements of population/Migrations
- Restoration of family links
- Education
- Victim support (sexual abuses, tortures...)
- Other?

Nota Bene: The importance of digital technology in the development agenda has been identified and recognised since the early 2000s. The objective is to encourage the use of technology to improve the living conditions of all and to achieve the goals in question. In this sense, the projects implemented as part of international development aid and humanitarian aid can potentially rely on digital technologies requiring the use of personal data.

### 3. Regional Distribution of official development assistance by Individual Donors (States) and Multilateral Agencies

Region	Percentage
Sub-Saharan Africa	38,83
South and Central Asia	19,94
Other Asia and Oceania	10,15
Middle East and North Africa	16,37
Europe	6,59
Latin America and Caribbean	8,12
<b>Total</b>	<b>100,00</b>

Source: OECD

### 4. Indicative list of countries which have adopted a data protection legislation since 2020 (as of July 2025) = 28

Name of the country	Law
Belize	Law
Belarus	Law
British Virgin Islands	Law
<b>Brunei</b>	<b>Law</b>
<b>Cameroon</b>	<b>Law n° 2024/017 December 2024</b>

Cuba	Law
Ecuador	Law
<b>El Salvador</b>	<b>Law 23. 11 2024</b>
Ethiopia	Law ( <a href="#">April 24</a> )
<b>Grenada</b>	<b>Law</b>
Indonesia	Law ( <a href="#">20.9.22</a> )
<b>Jordan</b>	<b>Law 17.92023 (entry into force le 17 mars 2024)</b>
<b>Kiribati</b>	<b>Law April 2025</b>
Laos	Law
<b>Malawi</b>	<b>Law 3.6 20424</b>
Mongolia	Law (January 22)
Oman	Law
Rwanda	Law (October 2021)
<b>Saint Kitts and Nevis</b>	<b>Law 2.5 2018 (not yet entered into force)</b>
<b>Somalia</b>	<b>Law (2023)</b>
Saudi Arabia	Law
Sri Lanka	Law (March 2022)
Swaziland	Law
<b>Syria</b>	<b>Law</b>
Tanzania	Law ( <a href="#">October 2022</a> )
United Arab Emirates	Law
Zambia	Law (2021)
Zimbabwe	Law

Key: countries added since July 2024 are shown in green.

**5. Data protection authorities established since 2020 that have joined the GPA as observers or members = 1**

Name of the authority	GPA status
The National Data Protection Authority from Somalia	Observer (2024)

**6. Indicative list of countries that do not yet have data protection legislation (as of July 2025) = 45**

Name of the country	Level of protection
Afghanistan	No law
<b>Bangladesh</b>	<b>Draft Law</b>
<b>Bolivia</b>	<b>Draft law</b>

Burma	No law
Burundi	No law
<b>Cambodia</b>	<b>Draft law</b>
Central African Republic	No law
Comoros	No law
<b>Djibouti</b>	<b>draft law</b>
Dominica	No law
Eritrea	No law
Fiji	No law
Gambia	No law
Guatemala	No law
<b>Guinea-Bissau</b>	<b>Draft law</b>
Haiti	No law
<b>Honduras</b>	<b>Draft law</b>
Iran	Draft law
Iraq	No law
Kuwait	No law
Liberia	No law
Libya	No law
<b>Maldives</b>	<b>Draft law</b>
Marshall Islands	No law
Micronesia	No law
Mozambique	No law
<b>Namibia</b>	<b>Draft law</b>
Nauru	No law
North Korea	No law
<b>Pakistan</b>	<b>Draft law</b>
Palau	No law
Palestine	No law
Papua New Guinea	No law
Puerto Rico	No law
Solomon Islands	No law
Samoa	No law
Sierra Leone	No law
<b>South Sudan</b>	<b>Draft law</b>
Sudan	No law
Suriname	Draft law
Timor Leste	No law
Tonga	No law
Tuvalu	No law
<b>Vanuatu</b>	<b>Draft law</b>
Venezuela	No law

Key: countries added since July 2024 are shown in green.

## 7. Examples of potentially data-intensive projects

### **Agence française de développement :**

Digital Identity Nigeria (€100,000,000)

PAAMG: Support project for the implementation of generalized health insurance Comoros (€16,000,000)

New technologies and digital innovation for health and epidemiological surveillance (€300,000)

### **World Bank:**

Mexico National Digital Identity System to Facilitate Inclusion (US\$225,000,000)

Haiti Digital Acceleration Project (US\$60 000 000)

Madagascar Digital Governance and Identification Management System Project- PRODIGY (US\$140 000 000)

### **Swiss Agency for Development and Cooperation:**

Civil Registry System Reform Project in Tajikistan (CRR) (4 040 000 CHF)

### Annex 3



**GPA**

Global Privacy Assembly

### List of contact points within DPAs on the African continent

July 2025

N°	Country	Level of Protection	Date	Data Protection Authority	Contact
1	Algeria	Law	2023	Autorité nationale de protection des données à caractère personnel (ANPDP)	<a href="mailto:contact.anpdp@anpdp.dz">contact.anpdp@anpdp.dz</a>
2	Angola	Law	2011	Agence de protection des données (APD)	<a href="mailto:geral@apd.ao">geral@apd.ao</a> ou <a href="mailto:info@apd.ao">info@apd.ao</a>
3	Benin	Law	2009 2017	Autorité de protection des données à caractère personnel (APDP)	<a href="mailto:contact@apdp.bj">contact@apdp.bj</a>
4	Botswana	Law	2018	N/A	N/A
5	Burkina Faso	Law	2004	Commission de l'informatique et des libertés (CIL)	<a href="mailto:infos@cil.bf">infos@cil.bf</a>
6	Burundi	No law	-	-	-
7	Cameroon	Law	2024	Autorité de protection des données à caractère personnel (APD)	N/A (law applicable on June 23, 2026)
8	Cape Verde	Law	2013	Commission nationale de protection des données (CNPDP)	<a href="mailto:cnpdp@cnpdp.cv">cnpdp@cnpdp.cv</a>
9	Central African Republic	No law	-	-	-

10	Chad	Law	2015	Agence nationale de sécurité informatique et de certification électronique (ANSICE)	
11	Comoros	No law	-	-	-
12	Democratic Republic of the Congo	Law	2023	N/A	N/A
13	(Republic of the) Congo	Law	2019	N/A	N/A
14	Djibouti	Draft law	-	-	-
15	Egypt	Law	2020	N/A	N/A
16	Equatorial Guinea	Law	2016	N/A	N/A
17	Eritrea	No law	-	-	-
19	Eswatini	Law	2022	Eswatini data protection authority (EDPA)	<a href="mailto:dataprotection@escco.m.org.sz">dataprotection@escco.m.org.sz</a>
19	Ethiopia	Law	2024	N/A	N/A
20	Gabon	Law	2011 md. 2023	Autorité pour la protection des données personnelles et de la vie privée (APDPVP)	<a href="mailto:contact@apdpvp.ga">contact@apdpvp.ga</a>
21	Gambia	No law	-	-	-
22	Ghana	Law	2012	Data Protection Commission (DPC)	<a href="mailto:info@dataprotection.org.gh">info@dataprotection.org.gh</a>
23	Guinea	Law	2016	N/A	N/A
24	Guinea-Bissau	No law	-	-	-

25	Ivory Coast	Law	2003	Autorité de régulation des télécommunication de Côte d'Ivoire (ARTCI)	<a href="mailto:info-apdcp@artci.ci">info-apdcp@artci.ci</a>
26	Kenya	Law	2019	Office of the Data Protection Commissioner (ODPC)	<a href="mailto:info@odpc.go.ke">info@odpc.go.ke</a>
27	Lesotho	Law	2011	N/A	N/A
28	Liberia	No law	-	-	-
29	Lybia	No law	-	-	-
30	Madagascar	Law	2015	N/A	N/A
31	Malawi	Law	2024	The Malawi Data Protection Authority (DPA)	info@dpa.mw
32	Mali	Law	2013 md. 2017	Autorité de protection des données à caractère personnel (APDP)	<a href="mailto:contact@apdp.ml">contact@apdp.ml</a>
33	Marocco	Law	2009	Commission nationale du contrôle de la protection des données à caractère personnel (CNDP)	<a href="mailto:contact@cndp.ma">contact@cndp.ma</a>
34	Mauritania	Law	2017	Autorité de protection des données à caractère personnelle (APD)	<a href="mailto:contact@apd.mr">contact@apd.mr</a>
35	Mauritius	Law	2009 md. 2017	Data protection office (DPO)	<a href="mailto:dpo@govmu.org">dpo@govmu.org</a> ou <a href="mailto:dpo22@govmu.org">dpo22@govmu.org</a>
36	Mozambique	No law	-	-	-
37	Namibia	Draft law		N/A	N/A

38	Niger	Law	2017 md. 2019	Haute autorité de protection des données à caractère personnelle (HAPDP)	<a href="mailto:contact@hapdp.ne">contact@hapdp.ne</a>
39	Nigeria	Law	2019	Nigeria data protection commission (NDPC)	<a href="mailto:info@ndpc.gov.ng">info@ndpc.gov.ng</a>
40	Rwanda	Law	2021	Data Protection and Privacy Office	<a href="mailto:dpp@dpo.gov.rw">dpp@dpo.gov.rw</a>
41	Sao Tome and Principe	Law	2016	Agence nationale de protection des données personnelles (ANPDP)	<a href="mailto:geral@anpdp.st">geral@anpdp.st</a>
42	Senegal	Law	2008	Commission de protection des données personnelles (CDP)	<a href="mailto:contact.cdp@cdp.sn">contact.cdp@cdp.sn</a>
43	Seychelle	Law	2018 md. 2023	Information Commission	<a href="mailto:dantoine@infocom.sc">dantoine@infocom.sc</a>
44	Sierra Leone	No law	-	-	-
45	Somalia	Law	2023	Data protection authority (DPA)	<a href="mailto:info@dpa.gov.so">info@dpa.gov.so</a>
46	South Africa	Law	2013 2021	The Information Regulator (South Africa)	<a href="mailto:enquiries@info regulator.org.za">enquiries@info regulator.org.za</a>
47	South Sudan	Draft law	-	-	-
48	Sudan	No law	-	-	-
49	Tanzania	Law	2022	Personal data protection commission (PDPC)	<a href="mailto:dg@pdpc.go.tz">dg@pdpc.go.tz</a>
50	Togo	Law	2019	N/A	N/A

51	Tunisia	Law	2004	Instance nationale de protection des données personnelles (INPDP)	<a href="mailto:inpdp@inpdp.tn">inpdp@inpdp.tn</a>
52	Uganda	Law	2019	Personal Data Protection office (PDPO)	<a href="mailto:info@pdpo.go.ug">info@pdpo.go.ug</a>
53	Zambia	Law	2021	Data Protection Commission (DPC)	<a href="mailto:enquiries@dataprotection.gov.zm">enquiries@dataprotection.gov.zm</a>
54	Zimbabwe	Law	2021	Postal and Telecommunications Regulatory Authority of Zimbabwe (POTRAZ)	<a href="mailto:the.regulator@potraz.gov.zw">the.regulator@potraz.gov.zw</a>

Green = law and authority in place

Blue = law passed but no authority in place

Yellow = bill in progress

Grey = no legislation

