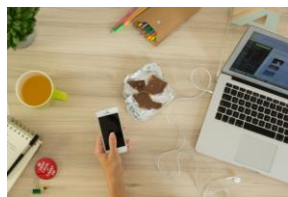




# Employee Data Privacy – Israel

## Registration Requirements

### Does HR data processing require registration under data protection laws?



Data protection laws sometimes include conformity assessments, which help to ensure businesses follow regulations.

Requirements can

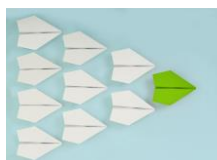
include registration before the Data Protection Authority and random audits. Israel's Protection of Privacy Law, 1981 (PPL) requires the registration of databases in certain instances.

Under the PPL, a database is defined as “a collection of data, maintained by magnetic or optical mean and intended for computer processing.” Databases must be registered if it:

- contains data for more than 10,000 individuals;
- contains “sensitive data;”
- contains data about individuals and the data was not provided to the database by those individuals, on their behalf, or with their consent;
- belongs to a public body; or,
- is used for direct mailing.

Database registration should be submitted to the Registrar of Databases and include:

- the Israeli addresses and identity of the database owners, the individual who holds the database or a portion of the database on a permanent basis, and the database manager;
- the purpose(s) for which the database was established and the purpose(s) for which the data is intended;
- the types of data that will be included;
- details on the transfer of any data outside of Israel; and,
- details on receiving data on a permanent basis from a public body, the name of the public body and the nature of the data delivered, except for details delivered with the consent of the individuals to whom the data relates.



### HR Best Practices:

If a database meets any of the above requirements, register the database with the Registrar. Regardless of whether registration is required, build in privacy considerations and risk assessments for employee and candidate data collection processes.

In January 2022, a memorandum of law was published by the Israeli Ministry of Justice that seeks to comprehensively amend the PPL (Amendment No. 14). If Amendment No. 14 passes in its current form, it will reduce the scope of the obligation to register databases.

Last updated November 2022.

DISCLAIMER: The information contained in this document is for general information purposes only and is not intended to be a source for legal, tax, or any other professional advice and should not be relied upon as such. This information is not intended to create, and the receipt of it by the reader does not constitute, an attorney-client relationship. All legal or tax questions or concerns should be directed to your legal counsel or tax consultant. Laws and regulations may change and UKG Inc. (“UKG”) cannot guarantee that all the information in this document is accurate, current or complete. UKG MAKES NO REPRESENTATION OR WARRANTIES WITH RESPECT TO THE ACCURACY OR COMPLETENESS OF THE DOCUMENT OR THE INFORMATION OR CONTENT CONTAINED HEREIN AND SPECIFICALLY DISCLAIMS ALL REPRESENTATIONS AND WARRANTIES INCLUDING BUT NOT LIMITED TO ANY EXPRESS OR IMPLIED WARRANTIES OF MERCHANTABILITY, SUITABILITY, OR COMPLETENESS OF THIS INFORMATION. TO THE EXTENT PERMITTED UNDER APPLICABLE LAW, NEITHER UKG, NOR ITS AGENTS, OFFICERS, EMPLOYEES, SUBSIDIARIES, OR AFFILIATES, ARE LIABLE FOR ANY DIRECT, INDIRECT, INCIDENTAL, SPECIAL, EXEMPLARY, OR CONSEQUENTIAL DAMAGES (INCLUDING PROCUREMENT OF SUBSTITUTE GOODS OR SERVICES, LOSS OF USE OR PROFITS, OR BUSINESS INTERRUPTION), EVEN IF THE UKG HAS BEEN ADVISED OF THE POSSIBILITY OF SUCH DAMAGES, ON ANY THEORY OF LIABILITY, WHETHER IN CONTRACT, STRICT LIABILITY, OR TORT, ARISING IN ANY WAY OUT OF THE USE OF OR INABILITY TO USE THIS INFORMATION. This document and the content are proprietary and confidential information of UKG. No part of this document or its content may be reproduced in any form, or by any means, or distributed to any third party without the prior written consent of UKG © 2022 UKG Inc. All rights reserved.