

2025

FPF ISRAEL ANNUAL REPORT



FOREWARD

As 2025 comes to a close, FPF-Israel reflects on a year of significant legal reform, regulatory maturation, and practical engagement with data protection in an increasingly digital and automated environment. This year unfolded against heightened regional tensions, including the October 7 war and ongoing security concerns related to Iran, underscoring Israel's broader security instability and highlighting the delicate balance between national security and individual privacy rights.

Legislative Reform and Amendment No. 13

A defining development was the advancement of [Amendment No. 13 to Israel's Privacy Protection Law](#), which strengthened enforcement mechanisms, clarified organizational obligations, and empowered the Privacy Protection Authority. FPF-Israel accompanied this process through [a series of interviews exploring its practical implications](#), and a [detailed table summarizing violations and sanctions](#), culminating in a [comprehensive overview of the amendment](#) that provided guidance for regulators and organizations navigating the new legal landscape.

Comparative and Institutional Perspectives



Understanding Israeli privacy law in context requires a comparative lens. This year, FPF-Israel analyzed international developments such as the [United Kingdom's Data Use and Access Act](#), highlighting lessons relevant for Israeli legislation. In parallel, the Institute submitted [comments on the draft opinion on consent in privacy law](#), contending that informed consent alone is insufficient in the digital age and that Israeli law should recognize additional legal grounds.

Consent, and Data Subject Rights

The only anchor in Israeli law for lawful data processing is consent. In this context FPF-Israel submitted [comments on the draft opinion regarding consent in privacy law](#), in which we proposed an alternative interpretive that is better aligned with the existing technological reality, and which in our view can help bridge the current gaps in Israeli law arising from the lack of additional lawful bases for data processing.

We also held a webinar that sought to examine the meaning of [digital consent](#) in the current technological era from a range of different perspectives.

Beyond consent, [data subject rights](#), offer an additional way to strengthen an individual's control over their personal data, a topic we explored in a dedicated webinar that examined whether these rights genuinely rebalance the relationship between the data subject and the database owner.



Enforcement, Case Law, and Limits of Authority

Judicial developments further clarified the boundaries of lawful data access. A landmark ruling [prohibited police searches of computers based solely on consent](#), reinforcing constitutional protections and clarifying the limits of state authority in privacy enforcement.



Artificial Intelligence and Regulatory Guidance



The growing deployment of artificial intelligence across sectors prompted regulators to define expectations for responsible implementation. FPF-Israel contributed [detailed commentary on the Privacy Authority's draft guidance on AI systems](#).

As this year comes to a close, FPF-Israel's work has contributed to deepening public and professional discussion on privacy and data protection in Israel. Drawing

on comparative experience and policy analysis, the program has sought to highlight alternative regulatory approaches and more rightsprotective policy options, in ways that may assist policymakers, civil society, and other stakeholders in considering different paths for safeguarding individuals' rights and promoting responsible use of data.

