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STATELESSNESS ENCYCLOPEDIA ASIA PACIFIC

Third Edition

**Digital ID and its Impact on Statelessness in
Central Asia**



NATIONALITY FOR ALL
Advancing the right to a nationality in the Asia-Pacific region

SEAP

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Third Edition

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Digital ID and its Impact on Statelessness in
Central Asia

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List of Acronyms

CEDAW	Convention on the Elimination of All Forms of Discrimination against Women	ICESCR	International Covenant on Economic, Social and Cultural Rights	UDHR	Universal Declaration of Human Rights
CAT	The Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment	ICJ	International Court of Justice	UIAS	Unified Identification and Authentication System
CRC	Convention on the Rights of the Child	ID	Identity	UN	United Nations
CRC	Child Registration Certificate	ID4D	World Bank Identification for Development Initiative	UNDP	United Nations Development Programme
CRO	Civil Registry Office	IDEAS	World Bank's Identification for Enhanced Access to Services	UNHCR	United Nations High Commissioner for Refugees
CRPD	Convention on the Rights of Persons with Disabilities	IDP	Internally Displaced Person	UPIGS	Unified Portal of Interactive Government Services
CRVS	Civil Registration and Vital Statistics	IIN	Individual Identification Number	UPR	Universal Periodic Review
CSO	Civil Society Organization	MOU	Memorandum of Understanding	ZAGS	Civil Registration Offices (Zapis' Aktov Grazhdanskogo Sostoianiiia)
DPI	Digital Public Infrastructure	NDI	National Digital Identity		
EDS	Electronic Digital Signature	NFA	Nationality For All		
ESI	Unified Identification System	OECD	The Organisation for Economic Co-operation and Development		
EU	European Union	OTP	One-time Password		
GDPR	General Data Protection Regulation	PIN	Personal Identification Number		
ICCPR	International Covenant on Civil and Political Rights	SDG	Sustainable Development Goals		
ICERD	International Convention on the Elimination of All Forms of Racial Discrimination	SEAP	Statelessness Encyclopedia Asia Pacific		
		SIEI	System of Interdepartmental Electronic Interaction		
		SRS	State Registration Service		
		SSO	Single Sign-on		

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Introduction to Digital ID

In the 21st century, there has been a massive shift in priority away from traditional Civil Registration and Vital Statistics (CRVS) systems towards digital identity (digital ID) systems for many development actors. The World Bank's Identification for Development (ID4D) Initiative, established in 2014, was a crucial catalyst to "help countries realize the transformational potential of digital Identification systems to achieve the Sustainable Development Goals [SDGs]". The United Nations and other development actors have also characterized digital ID as having 'transformative' potential to increase the convenience and efficiency of public and private services, and to achieve SDG 16.9, to "provide Legal identity for all, including birth registration" by 2030. Digital ID systems are a foundational part of digital public infrastructure (DPI), which is a structure that enables governments to deliver services digitally to the public. As governments establish DPI to deliver services through a streamlined, digital platform, creating digital ID systems allow them to verify the public's identities to securely deliver such services. Through ID4D, the World Bank has played a major role in many countries' DPI development, including digital ID system design and implementation, largely through assistance with "analytics, assessments, and funding". Between 2015 and 2020, the World Bank's Initiatives provided over 60 countries support in establishing digital ID systems.

While digital ID systems, as an integral part of DPI, have the potential to streamline public and private services and increase efficiency of government service delivery, without principles of human rights built into its design, they can also amplify the exclusion, discrimination and inequality that exists in traditional CRVS systems. In a 2020

UNHCR analysis on emerging digital technologies and the right to privacy, a key finding was "that emerging digital technologies exacerbate and compound existing inequities, many of which exist along racial, ethnic and National origin grounds". The analysis notes that "without stringent protections, digital Identification systems for public services disproportionately exclude racial and ethnic minorities, especially those whose citizenship status is insecure". Lack of transparency of how digital ID systems are designed and who is consulted in the process makes it difficult for civil society to monitor for potential exclusion or discrimination, putting the onus for regulating the systems on governments. Further, digital ID systems store user data, often including biometrics such as photos and fingerprints which are highly sensitive and have the potential to put people at risk if that data is leaked or used for purposes beyond identity verification. In many countries' regulatory frameworks for digital ID systems, data collected for such systems is set to be used for specified purposes beyond identity verification, such as National security, which could lead to surveillance of immigrant populations, refugees, and stateless people. One of the 10 Principles of the ID4D Initiative is to "ensure universal access for individuals, free from discrimination", yet many states' require citizenship in order to access a digital ID, excluding stateless people.

Nationality for All (NFA), through its Third Edition has expanded the Statelessness Encyclopedia Asia Pacific (SEAP) in an effort to begin filling the gap in available information on how digital ID systems are designed in the Asia Pacific region, particularly how they impact stateless people. The application of digital ID systems typically focuses on citizens, which has also been the case in Asia Pacific, which often results in citizenship centric digital ID systems. This reinforces the systematic exclusion that often prevents stateless people from accessing essential services including healthcare, Education, a bank account, and employment. Digital ID discourse is also often highly technical

and inaccessible. As digital ID systems develop rapidly across the region, critical analysis of the impact of these systems on marginalized groups has been slow to catch up. Uncertainty surrounding the design of these systems, the lack of Legal and policy frameworks set in place prior to developing them, and the lack of public knowledge of the implications of such systems are serious concerns.

Beyond knowledge production, combatting the lack of transparency in digital ID systems' design and implementation requires shared principles, positions, and standards for what characteristics they should ideally have. The General Data Protection Regulation (GDPR), a law of the European Union, is the standard Legal framework for how to ensure protection of personal data in digital ID systems. While the GDPR's compliance guidelines are widely followed, it is difficult to monitor government compliance with respect to digital ID systems due to the lack of transparency of their characteristics and the lack of comprehensive Legal and policy frameworks behind them. Another framework is UNDP's Digital Legal ID Governance Framework for governments and civil society actors, which provides recommendations for rights based, inclusive digital identity systems. The Human Rights for Digital ID (HR4ID) Coalition, "a community of civil society organizations and researchers from across the globe advocating to diminish the negative impacts of digital identity on individuals and communities", has also adopted a common position on mandatory digital ID systems. With a focus on systems that either have mandatory enrollment, or mandatory use (required to access essential services such as health care), the common position includes:

- ◆ "Mandatory digital ID requirements negatively impact human rights/human life, particularly for those who are marginalized or vulnerable."

- ◆ "Public institutions should not require mandatory enrollment in a digital ID system."
- ◆ "Public institutions should not require mandatory use of elements of the digital ID system to access public services or privately provided public services."
- ◆ "In contexts where digital ID systems already exist or are in development, the State has an obligation to guarantee there are accessible, non-digital alternatives available for those who are unable to enroll or use the digital ID."
- ◆ NFA hopes that this research can contribute to as well as question these common positions and shared principles on how to ensure nondiscrimination, equity and protection of human rights in digital ID systems.

Methodology

The NFA Research team designed a standardized research framework to ensure consistency and comparability across all factsheets. We developed a uniform questionnaire in-house, outlining key thematic areas such as Legal Identity, Legal frameworks, policy implementation, population impact, and gaps in the protection of stateless and at-risk populations. This questionnaire guided the structure and scope of all data collection. Although not uniform, some elements of primary research have been incorporated based on the contributions to the NFA team by stakeholders. We also undertook an extensive review of secondary sources, including domestic legislation, policy documents, official statistics, academic publications, and credible reports from international organizations. By comparing and cross-referencing multiple sources, we reduced reliance on any single dataset and increased the accuracy of findings. In our attempt to ensure credibility, we have attempted to provide a source

for our claims and provide an analysis of our findings based on available evidence.

In addition to our own desk-based research, we collaborated with law firms, non-governmental organizations, and independent practitioners who contributed pro bono support. These experts shared primary inputs into laws, relevant case studies, provided legal interpretations, reviewed our drafts and provided inputs from their field experience. Their input helped us strengthen the depth and reliability of each factsheet.

Structure

Each factsheet is divided into four sections:

- Legal Identity
- Overview
- Laws
- Designed to Include? The Impact of Digital ID and Legal Identity on Citizenship and Nationality Rights

Legal Identity

The primary focus on this section relates to assessing if a given country has a Legal identity and who it is accessible to. It also explores the question of whether it forms a foundational document to access Nationality. The definitions for proof of Legal identity and civil registration that are used throughout the third edition follow the Guide drafted under the World Bank's Identification for Development (ID4D) Initiative.

Overview

This section provides an overview of digital Identification (digital ID) systems in each country within the Asia Pacific, with a focus on their structure, scope, and implications. Our primary conceptual reference for referring to a digital ID

system is drawn from the World Bank's Glossary on Digital Identification. It further assesses whether each country's digital ID is classified as foundational or functional, following the distinctions made in the World Bank's ID4D Guide. Foundational IDs are "primarily created to manage identity information for the general population and provide credentials that serve as proof of identity for a wide variety of public and private sector transactions and services", while functional IDs are designed "to manage Identification, authentication, and authorization for a particular service or transaction, such as voting, tax administration, social programs and transfers, financial services, and more". The analysis also considers whether the use of digital ID is Legally or de facto mandatory or optional, whether it is available exclusively to citizens or also to non-citizens, and the range of services that are linked to it. Crucially, the section examines the availability of alternative pathways to access these services in cases where an individual does not hold or cannot obtain a digital ID. Beyond the ID systems themselves, the section explores the development of other forms of state-sponsored digital public infrastructure (DPI) and evaluates whether access to these platforms requires a digital ID. These lines of inquiry are critical in understanding patterns of inclusion and exclusion. They provide the analytical groundwork for mapping the ways in which digital ID systems intersect with questions of citizenship and the equitable delivery of essential services.

In addition, the section examines procedural safeguards in the design and rollout of digital ID systems. It investigates whether governments engaged in public consultations, solicited expert input, or conducted impact assessments before implementation, or whether the systems emerged primarily through Public-Private Partnerships (PPPs) without significant public debate. This exploration helps to assess the extent to which the creation of digital ID systems reflects democratic processes and participatory Governance.

Understanding these procedural dimensions is essential for evaluating both the legitimacy of such systems and their potential social consequences.

Laws

This section examines the Legal safeguards that govern digital Identification (digital ID) systems, beginning with an assessment of the laws that apply to such systems in each country. This is a critical starting point, as many governments in the region have moved forward with implementing digital ID systems in the absence of a robust Legal framework. Without Legal safeguards, individuals' most sensitive personal data is at risk. Digital ID systems typically collect highly private information, including biometric identifiers such as fingerprints and iris scans, as well as demographic details such as address, age, and gender. The absence of strong regulatory protections exposes this data to potential misuse, surveillance, and security breaches, as has been widely reported. Accordingly, this section not only reviews laws and policies directly governing digital IDs but also assesses the presence and the use of related legislation on data protection, privacy, surveillance, cybersecurity, and access to Legal remedies in cases of rights violations.

The analysis further considers whether a country has drawn on another nation's model in designing its own framework. It also examines how the country defines "digital ID" in its Legal and policy documents. This is significant because no universally agreed definition of digital ID exists, and countries interpret and apply the concept differently. Moreover, States in the Asia Pacific are at varying stages of development and implementation of their systems. The scope of application is another critical point, wherein most cases, the Legal definition specifies that digital IDs are accessible to citizens only, as observed in Afghanistan, Nepal, Fiji. Such a scope automatically excludes stateless persons and other non-citizens

from obtaining a digital ID, creating structural barriers to their access to essential services.

In addition to domestic law, the section explores a country's international obligations. While there are no binding international treaties specifically addressing digital ID systems, States in the region are party to a range of core human rights instruments. The analysis considers whether the design and implementation of digital ID systems are consistent with obligations under treaties such as the International Covenant on Civil and Political Rights (ICCPR), the International Covenant on Economic, Social and Cultural Rights (ICESCR), the Convention on the Rights of the Child (CRC), the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW), the Convention on the Elimination of All Forms of Racial Discrimination (CERD), the Convention on the Rights of Persons with Disabilities (CRPD), and the two Statelessness Conventions. The section evaluates whether digital ID and Legal identity systems risk enabling discrimination in providing Legal identity documents or access to digital ID, infringing the right to privacy, or denying individuals access to essential services, among others, which could amount to violations of these international commitments.

Designed to Include? Impact of Digital ID and Legal Identity on Citizenship and Nationality Rights

The final component of each country's factsheet is an analytical section that synthesizes the findings from the preceding three sections to assess the implications of digital ID and Legal identity systems for stateless individuals, drawing together evidence on Legal frameworks, system design, and procedural safeguards. This section aims to identify patterns of exclusion that emerge directly or indirectly from the structure and

requirements of digital ID systems. It examines how these systems may create or exacerbate barriers for stateless individuals in accessing essential services, exercising their rights, or participating fully in public life. Beyond identifying exclusionary outcomes, it also explores whether a digital ID system of a country reflects principles of inclusion, transparency, accountability, and human rights-based approaches.

Where available, the section incorporates relevant judicial precedents that address digital ID systems in each country, providing insight into how National courts have interpreted and applied laws relating to identity, privacy, and access to services. These cases can reveal whether the judiciary has acted as a check on government overreach, upheld individual rights, or reinforced exclusionary policies. The section also evaluates whether governments have introduced targeted measures to facilitate access to digital IDs for vulnerable and marginalised groups, including stateless persons, persons with disabilities, minorities, and older persons. Examples of such measures might include deploying mobile registration units to remote areas, waiving documentation requirements in certain cases, offering free Legal aid, or conducting outreach campaigns in multiple languages. This concluding analytical section aims to provide a holistic understanding of how digital ID systems intersect with the lived realities of stateless individuals and other at-risk populations.

Limitations

While our methodology maintained a high degree of consistency and credibility, it also faced certain constraints that shaped the scope and depth of our findings. We relied primarily on secondary data, which may not fully capture recent developments, unreported cases, or nuanced local realities. Future research on the subject should aim to incorporate primary fieldwork such that it leads

to greater insight into the real on-the-ground impacts of digital ID systems, particularly on stateless individuals. The availability and quality of information varied considerably across countries. In some contexts, official statistics were outdated or inaccessible. Accessing laws and policies was particularly challenging in politically sensitive environments or where official documents were not available in English. In these cases, our reliance on official translations sometimes meant working with sources that reflected bias or omitted key details. Furthermore, many countries, particularly in the Pacific, were in the developmental stages of their digital ID systems, which provided very limited room to understand its impact on stateless individuals. There were a few countries in the region which we could not find reviewers or collaborators for, resulting in not all country-specific data being verified directly by in-country stakeholders. The project also experienced temporary delays due to uncertainty arising from potential foreign aid cuts, which impacted timelines and workflow.

The findings presented in this report should be interpreted with these limitations in mind. The aim of this report is knowledge production. It is not intended to serve as legal advice. Future iterations of this research would benefit from incorporating primary field studies, strengthening collaborations with regional partners, and expanding the thematic scope to include other areas where stateless individuals may be affected by the introduction of digital ID systems.

Sub-Regional Overview: Central Asia

Countries Covered: Kazakhstan, Kyrgyzstan, Tajikistan, Turkmenistan, Uzbekistan

Legal Identity

Across all five countries in Central Asia legal identity systems are built on civil registration, national identity documents, and residence registration systems, all of which are influenced by administrative structures inherited from the Soviet period.¹ In all countries in the sub-region, birth registration serves as the foundational legal identity document, while national ID cards (Kazakhstan, Kyrgyzstan, and Uzbekistan) or internal passports (Tajikistan and Turkmenistan) function as the primary proof of legal identity for adults. Additionally, they are required to access public and private services such as healthcare, education, banking, employment, voting, taxation, and social benefits.

The Central Asian countries operate a layered identity system in which birth registration establishes initial legal identity but must later be followed by issuance of national ID cards or internal passports.

In all countries in the sub-region, national ID cards or internal passports are issued from the age of 16 and become the primary identity document used for most administrative and legal purposes.²

Birth registration is universal across the sub-region and is legally mandatory in all five countries. It is important to note that birth registration is

accessible regardless of citizenship or residency status of the parents or child. This means that children of non-citizens, including stateless persons, are entitled to birth registration across the sub-region. However, birth registration alone does not constitute citizenship in any country in the sub-region; instead, it serves as the foundation upon which legal identity and citizenship documentation are later built. Citizenship is acquired by operation of nationality law; typically by birth, naturalization, or restoration; while identity documents serve as evidence of that status.

All countries in Central Asia provide specific legal identity documents for stateless persons. Kazakhstan, Kyrgyzstan and Turkmenistan issue Stateless Person Certificates, while Tajikistan issues certificates of stateless persons and residence permits.

Uzbekistan allows stateless persons permanently residing in the country to obtain ID cards upon reaching the age of 16, subject to having resided in the country for at least five years and meeting citizenship application conditions (including recognition of the Constitution, knowledge of the state language, and renunciation of any foreign citizenship).³

Table 1
Primary Legal Identity Documents in Central Asia

Country	Primary Legal Identity Document	Documents Required	Does Legal Identity Serve as Proof of Citizenship
Kazakhstan	National ID Card	Birth certificate, Individual Identification Number	No
Kyrgyzstan	National ID Card/Internal Passport	Birth certificate, PIN, proof of parents' citizenship	No
Tajikistan	Internal Passport/Electronic ID Card	Birth registration and other documentation (as required)	No
Turkmenistan	Internal Passport	Birth certificate and residence registration	No
Uzbekistan	ID Card/Passport	Birth certificate and other documentation (as required). ⁴	Yes (ID card confirms citizenship) ⁵

Overview of Digital ID

Four of the five Central Asian countries (Kazakhstan, Kyrgyzstan, Tajikistan, and Uzbekistan) have introduced digital identity systems or digital authentication platforms as part of broader digital government and digital economy strategies.

Kazakhstan and Kyrgyzstan have established fully integrated foundational digital identity systems anchored in national identity registers. Tajikistan and Uzbekistan have implemented functional digital identity platforms: Tajikistan's IMZO operates primarily as a digital authentication and electronic signature tool, while Uzbekistan's OneID/eID platform functions as an authentication and single sign-on system for e-government services. Although Uzbekistan's eID does not yet constitute a fully integrated foundational digital ID system, it enables access to government services through digitized identity credentials and is increasingly central to digital public service delivery. In the sub-region, digital identity systems are typically designed and function on top of

existing national ID systems rather than replacing them, meaning that foundational legal identity documents remain necessary to access digital identity systems.

In Kazakhstan and Kyrgyzstan, digital identity systems are integrated into national e-government platforms that allow individuals to access digital versions of identity documents and government services online.⁶ In Uzbekistan, the OneID system and Unified Portal of Interactive Government Services allow users to authenticate their identity and access government services using digital identification credentials.⁷ Tajikistan has developed the IMZO digital identification and electronic signature system, which functions primarily as a digital authentication tool for accessing government services rather than as a full digital identity system.⁸ Turkmenistan has announced plans to create a Unified Identification and Authentication System as part of its digital economy development strategy but has not yet implemented a full digital ID system.⁹

Across the sub-region, digital ID systems are generally classified as either foundational digital ID systems integrated with national identity registers (Kazakhstan and Kyrgyzstan) or functional digital ID systems used primarily for authentication and electronic signatures (Tajikistan) or hybrid functional and foundational as is the case with Uzbekistan's eID.

Digital ID systems are primarily used to access digital public infrastructure such as government service portals, social benefits and pensions, health records and healthcare services, tax and financial services, migration and residence services, notarial and administrative services and banking and financial services. In most countries in the sub-region (Kazakhstan, Tajikistan, and Uzbekistan; note that in Kyrgyzstan, biometric registration is legally mandatory for all citizens¹⁰), digital ID is not yet legally mandatory.

However, it is becoming de facto mandatory across the sub-region because access to many government services increasingly requires digital authentication. For example, for digital public services, telecom subscriptions, pensions, and air travel), rendering digital ID effectively unavoidable in practice.¹¹

Access to digital ID systems is generally available to citizens and, in some cases (Kazakhstan, and in theory, Uzbekistan), foreign residents and stateless persons who possess legal identity documents such as residence permits or stateless person certificates. However, undocumented stateless persons across the sub-region cannot access digital identity systems. Kazakhstan has launched the QazETA platform in pilot mode as a dedicated digital entry point for foreign nationals, including stateless persons, to access migration and residence services online.¹² Digital identity systems are generally (in Kazakhstan, Kyrgyzstan, Tajikistan, and Uzbekistan) linked to national ID systems and therefore indirectly linked to citizenship or legal residence status. Stateless persons who possess legal identity documents may

access some digital services, but undocumented stateless persons would be excluded from digital public infrastructure and services linked to digital identity systems.

Digital ID frameworks across Central Asia have largely been developed through government-led digitalization strategies, often with technical assistance from international organizations and private technology providers.¹³

Public participation in the design of digital identity systems appears to be limited. Moreover, there is little publicly available information indicating involvement of experts focusing on discrimination, statelessness, or minority rights in the development of digital ID frameworks.

Table 2**Digital Identity Systems in Central Asia**

Country	Digital ID system found in the country?	Key Features
Kazakhstan	eGov.kz / eGov Mobile with electronic/digital forms of identity documents	State-managed ecosystem linked to the national ID and IIN; digital versions of more than 30 documents; QR-based presentation; access to online public services, health services, social wallet, e-notary functions, and some migration-related services for foreigners and stateless persons.
Kyrgyzstan	Tunduk ecosystem, including Tunduk app, My O! integration, and Unified Identification System (ESI).	Anchored in the national ID/passport and mandatory biometric registration; provides digital passport/ID-related documents, driver's licence, vehicle registration, marriage certificate, children's birth certificates, and access to 50+ government services through mobile and online authentication
Tajikistan	IMZO	Functional digital ID layer used for online identity verification and electronic signatures; supports single sign-on and access to government platforms, including public services, notarial services, and some police/administrative services; appears tied mainly to citizens using national ID credentials.
Turkmenistan	No operational digital ID system yet; planned Unified Identification and Authentication System (USIA) and System of Interdepartmental Electronic Interaction (SIEI).	Still at the planning/emerging stage; intended to enable authorised access to state electronic resources and inter-agency data exchange for electronic public services, but the country document indicates no implemented full digital ID system yet.
Uzbekistan	OneID / eID system	Authentication and sign-on platform for e-government and other services; integrated with my.gov.uz and related state systems; supports digitised identity documents and access to public and commercial services; stateless permanent residents may in principle access it if they meet documentation requirements.

Laws**Domestic Law and Policy**

Across Central Asia, digital identity systems are governed by a combination of laws relating to identity documents, electronic government, electronic signatures, digital development strategies, and personal data protection. Most countries do not have a single standalone digital ID law but instead regulate digital identity through broader digital governance or electronic document laws.

Kazakhstan and Kyrgyzstan have adopted Digital Codes that regulate digital identity, biometric authentication, and digital public services.¹⁴

Tajikistan regulates digital identity primarily through laws on electronic documents and electronic signatures.¹⁵ Uzbekistan regulates digital identity through laws on electronic government, electronic digital signatures, and digital development strategies.¹⁶ Turkmenistan regulates electronic documents, electronic government, and personal data protection but does not yet have a digital identity law or operational digital ID system.¹⁷

Most countries provide general complaint and grievance mechanisms through administrative courts, public service complaint systems, or data protection authorities.

Only Kazakhstan has a dedicated complaint mechanism specifically for digital identity systems - the Digital Code mandates the Ministry to review complaints concerning biometric authentication and data processing, and to conduct inspections and impose fines for violations.¹⁸

Data Protection

All countries in Central Asia have personal data protection or privacy laws that regulate the collection, processing, and protection of personal data, including biometric data used in digital identity systems. These laws generally require lawful collection of data, purpose limitation, consent for processing personal data, and security measures to protect personal data from unauthorized access or disclosure.

Biometric data such as fingerprints and facial images are classified as sensitive personal data subject to additional safeguards in Kazakhstan, Kyrgyzstan, Uzbekistan, and Turkmenistan. Tajikistan's Law On Personal Data (2018) sets general data protection rules but does not explicitly create a separate higher-protection regime for biometric data.¹⁹

None of the five Central Asian countries prohibit government access to personal data collected through digital identity systems; and government agencies are generally permitted to access personal data for purposes such as national security, law enforcement, or public administration.

Across the sub-region, concerns have been raised regarding privacy, surveillance, and data security, particularly in relation to biometric databases, centralized identity systems, and the integration of multiple government databases through digital identity platforms. Concerns include potential misuse of personal data, expanded state surveillance, and exclusion of individuals who do not possess digital identity credentials from public services.²⁰

In this context, it is noteworthy that Tajikistan's 2018 Law on Personal Data Protection and Uzbekistan's 2019 Law "On Personal Data" establish general obligations to adopt organizational and technical security measures,

but they do not set a specific legal requirement to encrypt personal data, including biometric and other digital-identity data, despite documented concerns and incidents relating to data security.²¹

International Commitments

There is no international treaty specifically regulating digital identity systems in Central Asia. However, countries in the sub-region are parties to various international human rights treaties that create obligations relevant to legal identity, data protection, non-discrimination, and access to essential services.

Turkmenistan has ratified all major human rights treaties, including the ICCPR, ICESCR, CRC, CEDAW, CERD, CRPD, the 1951 Refugee Convention and 1967 Protocol, and the 1954 Convention Relating to the Status of Stateless Persons and the 1961 Convention on the Reduction of Statelessness.²² Tajikistan, Kyrgyzstan and Kazakhstan have not ratified the 1954 or 1961 Statelessness Conventions.²³ Lastly, Uzbekistan has not ratified the 1951 Refugee Convention, the 1967 Protocol, the 1954 Statelessness Convention, or the 1961 Reduction of Statelessness Convention.²⁴

These treaties require states to ensure access to legal identity, birth registration, and essential services without discrimination. The CRC Committee has also emphasized that digital systems should be designed to enable children to safely access essential digital services without discrimination.²⁵

Designed to Include? The Impact of Digital ID and Legal Identity on Citizenship and Nationality Rights

Across Central Asia, digital identity systems have generally not significantly reduced statelessness,

as statelessness in the region is primarily addressed through civil registration reforms, nationality laws, statelessness determination procedures, and naturalization programs rather than through digital identity systems themselves.²⁶ Digital identity systems are layered on top of existing legal identity systems, meaning that individuals must first obtain legal identity documents before they can access digital identity systems.

As a result, digital identity systems tend to reinforce existing inequalities in access to legal identity and public services rather than resolve statelessness.

Stateless persons who possess stateless person certificates or residence permits may be able to access some digital services, but undocumented stateless persons are typically excluded from digital identity systems and the services linked to them.²⁷

Services that may be inaccessible to stateless persons without digital identity include social welfare and pension systems, healthcare services, education enrollment, banking and financial services, tax and employment registration, property registration and government e-services.

Kazakhstan, Kyrgyzstan, Tajikistan, and Turkmenistan have introduced specific measures to improve access to legal identity for vulnerable populations.

These include mobile registration offices and legal aid in Kazakhstan;²⁸ documentation campaigns and cooperation with legal clinics in Kyrgyzstan;²⁹ the 2019/2020 Amnesty Law regularization program in Tajikistan;³⁰ and the National Action Plan to End Statelessness (2019–2024) in Turkmenistan,³¹ which resolved all known cases of statelessness by September 2024. However, digital identity systems themselves generally do not contain specific legal provisions ensuring access for stateless persons.

To ensure that digital identity systems are inclusive, legal and policy frameworks across the region would need to incorporate safeguards ensuring access to digital public services for individuals without citizenship documentation. Such frameworks should also integrate digital identity systems with statelessness determination and civil registration processes. They should guarantee essential public services remain accessible through alternative non-digital mechanisms for those who are unable to obtain digital credentials.



Summary Table

Country	Legal ID (Type)	Digital ID (Foundational/Functional)	Domestic Laws & Policy Covering Digital ID
Kazakhstan	Birth registration, birth certificate, national ID card, passport, residence permit, stateless-person's certificate, refugee certificate.	Foundational digital ID (eGov portal, eGov Mobile, chip-enabled ID cards) anchored in national ID and IIN.	Digital Code (2026); Law On Documents of Identification; eGov portal and eGov Mobile regulations.
Kyrgyzstan	Birth registration and PIN; internal passport/national ID card; passports; residence permits; stateless status determined under Citizenship Law.	Foundational digital ID over the national ID/passport and mandatory biometric registration via Tunduk/My O!	Law on Biometric Registration of Citizens; Law on Acts of Civil Status; ID-card Regulation (2017); Digital Code (2025); Tunduk framework.
Tajikistan	Birth registration; internal passport or electronic ID card; foreign passport; certificate of stateless person; residence permit for foreign citizens/stateless persons; refugee and asylum-seeker certificates.	Functional digital ID (IMZO app) for citizens only; no comprehensive national e-ID scheme yet.	Law About The Electronic Document (2014); Identity Documents Law (2014); Concept of Digital Economy; IMZO implementation; Face-ID pensioner system.
Turkmenistan	Birth registration; internal passport; biometric passport; Stateless Person's Certificate; residence permit for foreigners/stateless persons.	No digital ID implemented yet; planned Unified Identification and Authentication System (USIA) and SIEI as future DPI.	Law On Electronic Document, Electronic Document Management and Digital Services (2020); Law On Electronic Government (2022); digital economy concepts and State Program 2026–2028.
Uzbekistan	Birth registration with QR code; birth certificate; passports; ID cards; drivers' licenses; residence permits; ID cards for stateless persons permanently residing in country.	Hybrid foundational/functional eID (OneID as cross-agency authentication, digital copies of ID documents recognised as legally equivalent).	Strategy Digital Uzbekistan-2030; Law on Electronic Government (2015); Law on Electronic Digital Signature (2023); OneID and eID system regulations.

Data Protection Law	Digital ID Mandatory?	Access for Stateless/Refugees	Intl. Treaties Ratified (Data/Human Rights)
Law On Personal Data and Their Protection (2013)	De facto mandatory for many services (ID replacement, health, social services) though some analog channels remain	Recognised stateless persons hold stateless-person certificates and can access some digital channels (e.g., migration services); access to full ecosystem is limited.	ICCPR, ICESCR, CEDAW, CRPD, CRC, CERD, 1951 Refugee Convention, 1967 Protocol, 1954 and 1961 Statelessness Conventions.
Law On Information of Personal Nature (2008); Digital Code; related decrees; State Personal Data Protection Agency.	Biometric registration mandatory; digital credentials increasingly necessary for many services but some offline access persists.	Stateless persons can in principle be naturalized and documented; no clear evidence they receive full digital credentials; some online appointment systems accessible to foreign citizens.	ICCPR, ICESCR, CEDAW, CRPD, CRC, CERD, 1951 Refugee Convention, 1967 Protocol, 1954 and 1961 Statelessness Conventions
Law On Personal Data (2018)	Sector-specific mandatory use (e.g., pensions via Face ID); IMZO used for access to digital services by citizens.	Stateless persons documented via certificates and residence permits; no evidence they can access IMZO; undocumented stateless persons face exclusion from many services.	ICCPR, ICESCR, CEDAW, CRPD, CRC, CERD; 1951 Refugee Convention and 1967 Protocol; not party to 1954/1961 Statelessness Conventions.
Law On Information on Private Life and Its Protection (2017).	No (digital ID not yet operational).	Recognised stateless persons use Stateless Person's Certificates to access services; lack of propiska limits access to some social benefits; no digital-ID access yet.	ICCPR, ICESCR, CEDAW, CRPD, CRC, CERD, 1951 Refugee Convention, 1967 Protocol, 1954 and 1961 Statelessness Conventions.
Law On Personal Data (2019).	Not formally mandatory; many e-services accessible via alternative channels, but eID/OneID increasingly central for key services.	Stateless persons with long-term residence and ID cards can access eID; those unable to meet residency and documentation criteria may be excluded.	ICCPR, ICESCR, CRC, CERD, CEDAW; alignment with SDG 16.9; Ministerial Declaration on a Decade of Action for Inclusive and Resilient CRVS in Asia and the Pacific (2025).

Kazakhstan

Legal Identity

In Kazakhstan, the main proof of legal identity for adult citizens is the National ID card of the citizen of the Republic of Kazakhstan.³² The Law of the Republic of Kazakhstan On Documents of Identification No. 73-V (2013) (referred to hereafter as Law On Documents of Identification) defines documents of identification as documents of an established form that contain personal data and allow identification of the person and their legal status.³³ Article 6 lists several identification documents, including the citizen passport, national identity card, foreigner's residence permit, stateless person's certificate, and refugee certificate.³⁴

*The Law On Documents of Identification applies to citizens, foreigners, and stateless persons. It provides specific documents for each group, such as residence permits and stateless person certificates, which prove identity and legal status but do not themselves grant citizenship.*³⁵

The national ID of a citizen of Kazakhstan is issued to citizens from the age of 16 and is valid within the territory of the country.³⁶ All the citizens of the Republic of Kazakhstan permanently residing on its territory should have their national ID as it is the main document that certifies an individual's identity.³⁷ This ID document is valid for 10 years.³⁸

Birth registration and the birth certificate play a foundational role in establishing legal identity in Kazakhstan.³⁹ Upon registration of birth, a birth certificate is issued containing the child's name, date and place of birth, parents' names, and their citizenship, where applicable.⁴⁰ Along with the birth certificate, an Individual Identification Number (IIN), a unique 12-digit number, is also issued.⁴¹

The Certificate of the Stateless Person is an identity document for a person who has no proof of possessing a citizenship of any state.⁴² Certificate of the Stateless Person is a personal identification document issued by a government authority at the place of the individual's permanent registration.⁴³ Specific rules on determining the legal status of persons without citizenship set out the procedure for applying to the migration authorities, verifying the person's status, and recognising them as stateless before issuing this certificate.⁴⁴ The Certificate of the Stateless Person functions as the primary legal identity document for recognised stateless individuals in Kazakhstan.⁴⁵

Overview of Digital ID

*Kazakhstan has developed a state-managed digital identity ecosystem as part of a broader national digitalisation strategy, centred on the eGov.kz portal, the eGov Mobile application and electronic or digital forms of identity documents linked to the IIN.*⁴⁶

The underlying legal identity remains the national ID card and passport. Individuals can apply for and replace these fully online through eGov and eGov Mobile application using a secure digital identification process that verifies the person's IIN, registered mobile number, one-time password (OTP) and biometric data.⁴⁷ The updated national ID card introduced from 1 June 2024 contains an electronic chip for digital identification and is explicitly framed as part of Kazakhstan's digital government push. This indicates that the digital ID framework is anchored in the foundational national identity system rather than a separate, purely functional scheme.⁴⁸

The eGov Mobile application includes a 'Digital Documents' section that holds digital versions of more than 30 documents. These include the national ID card, passport, driver's licence, and birth certificates. They can be presented via QR code and are accepted as legal equivalents to their physical counterparts in many contexts.⁴⁹



Photo: Tim Broadbent

KAZAKHSTAN

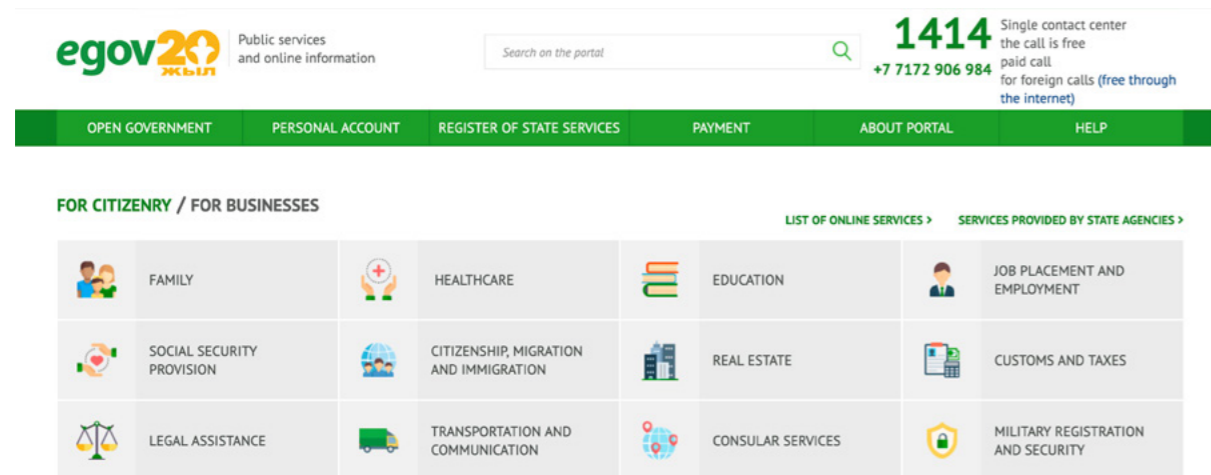


Photo: Kazakhstan eGovWebsite

Through the eGov.kz portal and eGov Mobile app, users can access a wide range of services. They can apply for or replace national ID cards and passports, obtain various certificates and submit electronic appeals (eOtinish).

The platforms also allow interactions with health services via eDensaulyq (including information on prescriptions, medical records, examinations and sick leave). In addition, users can use a social wallet, seek advice and lodge complaints on consumer protection, and access eNotary for powers of attorney and notarial consultations by video.⁵⁰

Kazakhstani citizens are the primary users of the full digital ID and digital documents ecosystem. Available information indicates that foreign nationals and stateless persons also have access to certain digital channels.⁵¹

The 'Permit a temporary residence to foreigners and stateless persons' is an online service offered by the Kazakhstan government that lets foreign nationals and stateless persons apply for a temporary residence permit through the national e-government portal.⁵²

Foreigners and stateless persons can apply online through the portal by logging in and signing their

application using an electronic digital signature or one-time password.⁵³ This implies that they can hold and use digital authentication credentials, at least for migration-related procedures. In addition, a dedicated platform, QazETA, has been launched in pilot mode as a digital entry point for foreign nationals to access migration and related services online, further confirming that non-citizens are being integrated into Kazakhstan's digital public infrastructure.⁵⁴ This further confirms that non-citizens are being integrated into Kazakhstan's digital public infrastructure.

Laws

Domestic Law and Policy

The Digital Code of the Republic of Kazakhstan No. 255-VIII ZRK, adopted on 9 January 2026, creates a unified legal framework for digital development, codifies digital rights, regulates biometric and other forms of digital authentication, and expressly guarantees a right to digital identity and its protection.⁵⁵

This new code builds on earlier legislation, notably the Law On Documents of Identification, which governs the issuance, replacement and destruction of identity cards and passports for citizens, foreigners and stateless persons.⁵⁶

Complaint and redress mechanisms for digital-ID-related issues are provided both through general public-service appeal procedures and through specific supervisory powers created by the Digital Code. Under the 'Government for Citizen' state corporation, individuals can submit video appeals or online complaints to heads of state bodies, with a statutory obligation to respond within 15 days. These channels also support biometric or EDS authentication for accessing information and services.⁵⁷ The Law on Public Services, which governs ID-card and digital-document issuance, already contains administrative complaint and appeal procedures for refusals, delays or mishandling of applications.⁵⁸ In addition, the Digital Code requires the Ministry to review complaints from citizens and companies concerning biometric authentication and data processing. It must conduct unscheduled inspections and impose administrative fines for violations.⁵⁹

Data Protection

The Law On Personal Data and Their Protection No. 94-V (2013), sets out principles for the lawful collection, processing, storage and confidentiality of personal data, including by state bodies.⁶⁰ As stated above, the Digital Code explicitly recognizes the right to digital identity and introduces rights to deletion, anonymization, restriction of processing, and tools for citizens to track which entities have accessed their data via eGov Mobile.⁶¹

The personal data law defines biometric data as personal data characterizing physical and biological features capable of identifying a person and provides that confidentiality conditions for biometric data must be established by Kazakh legislation.⁶²

Amendments adopted by Law No. 230-VIII of 17 November 2025 allow the collection and use of biometric data via technological means in public places for specified aims such as protection of

constitutional order, public order, rights and freedoms, health and morals, unless the data subject consents.⁶³ The same amendments require biometric authentication tools when working with 'limited-access personal data' in databases containing more than 100,000 records, which would cover large digital ID registers. However, these provisions function mainly as security and access-control requirements rather than a comprehensive special-category regime for biometrics.⁶⁴



Photo: Kazakhstan eGovMobile GooglePlayStore

Kazakh law does not explicitly prohibit government access to data collected for digital ID.⁶⁵ It permits processing by state bodies on legal grounds and frames access through requirements of legality, purpose, necessity and proportionality.⁶⁶

The Digital Code reiterates that any limitations on digital rights must meet the tests of legality, necessity and proportionality. Additionally it introduces transparency tools for citizens to see who accessed their data, but it does not create an

outright ban on the government accessing digital ID data.⁶⁷

International Commitments

Kazakhstan is not a party to any international framework, agreement, or treaty setting obligations on digital IDs. Kazakhstan has ratified ICCPR, ICESCR, CEDAW, CRPD, CRC, CERD, the 1951 Refugee Convention and 1967 Protocol, 1954 Statelessness Convention, and 1961 Reduction of Statelessness Convention.⁶⁸

As a signatory to international treaties, the country is obliged to ensure birth registration (ICCPR Article 24(2); and CRC Article 7), non-discrimination (ICCPR Article 2, 26; ICESCR Article 26; and CRC Article 2), and access to essential services like health (ICESCR Article 12), education (ICESCR Article 13), and social security (ICESCR Article 9).⁶⁹ Furthermore, in its General Comment No. 25, the CRC Committee states that digital systems should be designed to enable all children to safely access essential digital public services and educational services without discrimination.⁷⁰

UNHCR and civil-society submissions to the UPR note that Kazakhstan’s Statelessness Determination Procedure and naturalization process impose heavy documentation burdens that many stateless persons cannot meet.⁷¹

Designed to Include? The Impact of Digital ID and Legal Identity on Citizenship and Nationality Rights

The introduction of Digital ID in Kazakhstan has not led to a significant reduction in statelessness. Available evidence suggests that, in practice, stateless persons who hold a stateless person’s certificate can primarily use digital authentication

for migration-related procedures, rather than accessing the full spectrum of services and digital documents available to citizens through eGov and eGov Mobile. This is because individuals must first obtain a physical identification document as proof of legal identity before they can access digital services. While digital IDs facilitates access to various services once obtained, its implementation has not fundamentally changed the situation for stateless persons.

Mobile registration offices and legal aid services have been introduced to assist vulnerable populations in obtaining documentation.⁷² However, the Kazakhstani government has not implemented targeted measures within the Digital ID framework to specifically address the needs of stateless individuals.

Nevertheless, Kazakhstan has taken several positive steps that can support the inclusion of stateless persons within its identity framework. The existence of a dedicated Certificate of the Stateless Person, with clear procedures for status determination and issuance by migration authorities, provides recognized stateless individuals with a primary legal identity document and a defined legal status.⁷³

The statelessness determination process also includes the possibility for authorities to proactively seek information from Kazakh and foreign authorities when applicants lack sufficient documents, which reduces the burden on undocumented individuals.⁷⁴ Integration of this status into certain digital channels, such as the ability to apply online for temporary residence permits and the development of platforms like QazETA, demonstrates an emerging effort to connect non-citizens, including stateless persons, to digital public infrastructure.

Along with broader digital-rights guarantees and transparency tools introduced by the new Digital Code, these measures create a foundation that could

be built upon to expand stateless persons’ access to essential services.

Further strengthening legal pathways for stateless individuals to acquire nationality and access Digital ID could enhance inclusivity and reduce administrative barriers. The main reason Kazakhstan has not prioritized this issue is that the overall number of stateless persons remains low, making it a less pressing concern compared to other social and governance challenges.

While Kazakhstan’s Digital ID system has improved service delivery and administrative efficiency, it still presents challenges for stateless

individuals and marginalized groups. Although the legal framework provides a structured approach to digital identity management, greater inclusivity measures are needed.

Policy reforms should focus on expanding access for stateless persons, enhancing data protection measures, and ensuring alignment with international human rights standards.





Photo: Mikhail Blinov

KYRGYZSTAN

Kyrgyzstan

Legal Identity

The State Registration Service (SRS) is the main authority for civil registration in Kyrgyzstan.⁷⁵ Birth registration is based on a birth notification issued by a medical practitioner; it must be completed within one month of birth.⁷⁶

During birth registration, the child is entered into the civil register and issued a birth certificate; SRS also issues a personal identification number (PIN) to the child at the time of registration.⁷⁷ The PIN is required later for issuance of national ID cards and passports.⁷⁸

In Kyrgyzstan, the internal passport or national ID card serves as the primary proof of legal identity for citizens aged 16 and older. For children, the birth certificate functions as the foundational identity document and provides supporting evidence of citizenship and identity status.⁷⁹ The ID card, valid for 10 years, also records residency registration, making it both the principal identity document and official proof of registered residence.⁸⁰ The system reflects the former Soviet model: civil registration offices (ZAGS) or municipal authorities record births, marriages, and deaths, while separate passport offices issue passports and national ID cards.⁸¹ At age 16, individuals may apply for a citizen's ID card on the basis of their birth certificate, personal identification number (PIN), and proof of their parents' citizenship.⁸²

The Law of the Kyrgyz Republic on Citizenship (2007) states that identity documents act as evidence of citizenship, but do not by themselves constitute it.⁸³ The law sets out the grounds for acquisition of citizenship: by birth, naturalization, restoration). Therefore citizenship is acquired by operation of law when the prerequisite conditions are met, rather than by possession of an identity document.⁸⁴

The 2007 Citizenship Law empowers the competent authorities to determine the citizenship or stateless status of persons permanently residing in the country.⁸⁵ Stateless individuals can obtain identity and residence documentation and may eventually be naturalized under the law. This law provides for the granting of citizenship to foreign citizens and persons without citizenship who meet specific requirements.⁸⁶ Under the general procedure, stipulated conditions include: five years of legal residence, a legal source of income, and the absence of specified grounds for refusal.⁸⁷

Overview of Digital ID

Kyrgyzstan has developed a state-managed digital identity ecosystem as part of a wider digitalization agenda centered on the Tunduk interoperability platform, the Tunduk mobile application, the My O! application, and the integration of electronic versions of key identity documents into these digital channels.⁸⁸

The primary legal identity remains the national ID or passport system along with mandatory biometric registration.⁸⁹ Increasingly, however, these credentials are managed and used through online and mobile interfaces that verify a person's PIN, passport details, mobile number and a digital signature obtained via the Unified Identification System (ESI).⁹⁰ The primary legal identity remains the national ID-card or passport, together with mandatory biometric registration. These credentials serve both as foundational proof of identity and nationality and as functional instruments for accessing public and private services through digital channels.⁹¹

The Tunduk application is described as a universal digital tool that consolidates numerous government and private services. It offers users digital documents including an electronic passport, digital driver's license, vehicle registration certificate and marriage certificate, which can be used to verify identity at banks and mobile service centers.⁹²

A related integration with the mobile operator O! allows users of the My O! app to access digital documents and government services provided by Tunduk, including digital ID card, driver's license, vehicle registration certificate, marriage certificate and children's birth certificates, along with more than 50 government services such as government certificates, statements of social benefits and a digital health profile.⁹³

Through these platforms, citizens can log in using credentials linked to their digital signature and verification codes delivered by SMS or email, and then obtain official documents and services remotely, reducing the need to visit Public Service Centers in person.⁹⁴

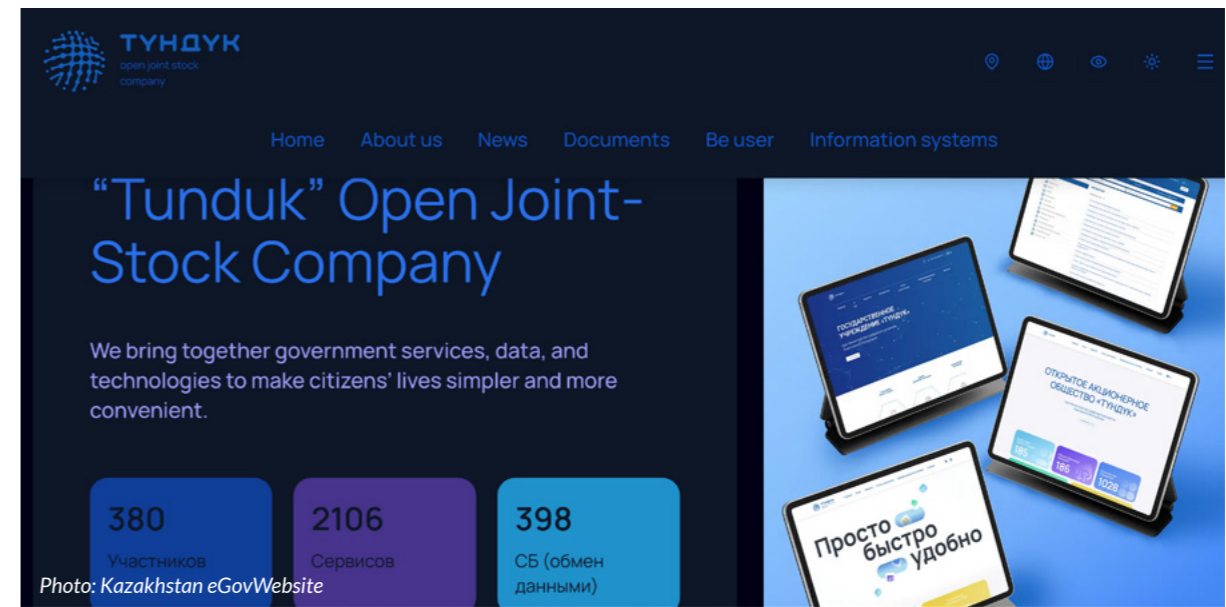
Kyrgyz citizens are the primary users of the full digital identity and digital documents ecosystem. The Law on Biometric Registration of Citizens of the Kyrgyz Republic (2014) states that each citizen of the Kyrgyz Republic shall undergo biometric registration.⁹⁵ The Government Order on the Procedure for Biometric Registration of Citizens (2014) specifies a nationwide biometric data collection campaign with ongoing collection when citizens reach 16 years of age or acquire citizenship.⁹⁶ These legal instruments, supplemented by the operational role of the State Registration Service and the Ministry of Digital Development, frame biometric data collection and the resulting biometric passports and ID cards as state property and core instruments for simplifying state services and personal identification.⁹⁷

Available information focuses on citizens and does not clearly specify whether foreign nationals or stateless persons can access the same digital credentials. However, official communication from the Ministry of Digital Development notes that online registration in Public Service Centers is available for foreign citizens without prior registration in Tunduk, suggesting that at least some digital channels for appointment booking are open to non-citizens even when they are not fully integrated into the national e-ID ecosystem.⁹⁸

Laws

Domestic Law and Policy

The registration of vital events is regulated by the Law on Acts of Civil Status (2020), which establishes the legal basis for a unified system of civil registration and underpins the central civil register used as a source for identity data.⁹⁹ The Law on Biometric Registration of Citizens of the Kyrgyz Republic (2014) establishes the core legal framework for the collection, processing, storage and use of biometric data, and makes biometric



registration mandatory for every citizen as a basis for simplifying state-service delivery and personal identification.¹⁰⁰ This law defines biometric data, which includes facial images, fingerprints, and signatures. It regulates the creation and protection of the state biometric database.

It further refers to the general personal data regime under the Law on Information of Personal Nature (2008) for data subject rights and remedies.¹⁰¹ The new Digital Code of the Kyrgyz Republic (2025) consolidates and updates rules on personal data processing, digital services and electronic interaction between the state, citizens and businesses.¹⁰² It also defines obligations of data controllers, providing for administrative liability (including fines) for violations involving digital documents and personal data, and strengthening the legal basis for the use and protection of digital identities.¹⁰³

Complementing the aforementioned laws is the Government Order No. 197 on the ID card – the passport of the citizen of the Kyrgyz Republic of sample of 2017 (2017), which defines the national ID card as a national passport document for citizens that confirms their nationality and contains personal and biometric data in text, machine-readable and electronic form on an

embedded chip.¹⁰⁴ The Order specifies that the ID card is issued to all citizens aged 16 and above, that it stores a personal identification number, address, marital status and keys for electronic and digital signatures. It also provides that a digital version of the ID card has the same legal force as the physical document.¹⁰⁵

Information available does not indicate that there is a dedicated complaint or redress mechanism for issues arising from biometric registration and the issuance or use of the ID-card-based digital identity. Remedies appear limited to general administrative and judicial remedies. The biometric registration law provides that persons who violate its provisions bear responsibility under national legislation.¹⁰⁶ Protection and access to biometric data are governed by the Law On Information of Personal Nature (2008), and from February 2026, the Digital Code of the Kyrgyz Republic.¹⁰⁷

Together, these laws offer general data-subject rights and routes for complaints to competent authorities and courts, backed by administrative liability and fines for violations of personal data and digital rights rules.¹⁰⁸ Similarly, the ID-card Regulation focuses on the nature, contents and issuance of the card.¹⁰⁹

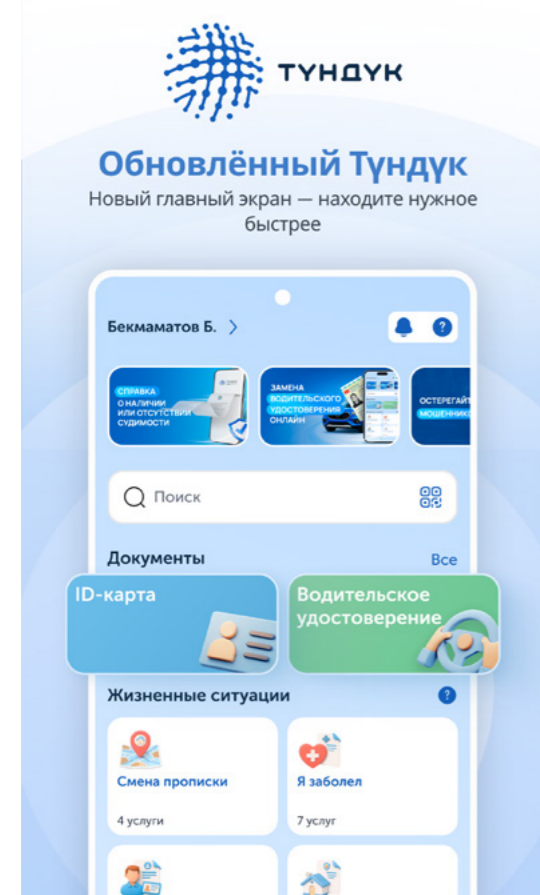


Photo: Kyrgyzstan TundukMobile Application GooglePlayStore

Data Protection

Kyrgyzstan has a general data protection regime centred on the Law On Information of Personal Nature (2008), complemented by a dedicated law on biometric registration and emerging digital-governance instruments. However, the overall framework remains fragmented and enforcement-heavy rather than rights-driven.¹¹⁰

The Law On Information of Personal Nature regulates the collection, processing, storage and dissemination of personal data by state bodies, local self-government and legal entities.¹¹¹ The law sets out that personal data be collected for 'precisely and predetermined, declared and legitimate purposes' and not further processed in ways incompatible with those purposes.¹¹² It also defines the rights and obligations of data subjects, 'holders (owners)' of personal data arrays and processors.¹¹³ It includes the duties to ensure confidentiality, control access to equipment and data carriers, and log changes to personal data.¹¹⁴ These provisions are supplemented by Government Decrees No. 759 and 760 of 21 November 2017, which specify the procedure for obtaining consent and set technical requirements for security of personal data in information systems.¹¹⁵ However, there are gaps in privacy protection and limited compliance in practice, weak implementation and low awareness undermine the effectiveness of the legal guarantees on paper.¹¹⁶

A State Personal Data Protection Agency was established to oversee compliance with the personal data regime, provide guidance and, in some cases, consider complaints.¹¹⁷ Parallel reforms introduced mandatory registration for all organizations that collect, store or process personal data in a national Registry of Holders (Owners) of Personal Data Arrays, with fines for entities operating without registration.¹¹⁸

Kyrgyzstan's rollout of biometric registration, e-ID cards and biometric passports has generated concerns that digital ID is entrenching new risks around privacy, surveillance and exclusion from public life.¹¹⁹ Investigative reporting has raised concerns about security of citizens' personal data. In 2017, journalists reported that a server of the State Registry Service (which holds citizens' personal information) was illegally used for the benefit of a presidential candidate, prompting public concern about misuse and vulnerability of the registry.¹²⁰ The biometric registration system, combined with unified ID numbers and e-ID cards embedded with chips, enables the state to link multiple registries and transactions (voting, social services, law enforcement information), raising fears of expanded surveillance and profiling without strong independent oversight.¹²¹

International Commitments

Kyrgyzstan is not a party to any international framework, agreement, or treaty setting explicit obligations on digital IDs. Kyrgyzstan has ratified ICCPR, ICESCR, CEDAW, CRPD, CRC, CERD, the 1951 Refugee Convention and 1967 Protocol, the 1954 Statelessness Convention, and the 1961 Reduction of Statelessness Convention.¹²²

As a signatory, the country is obliged to ensure birth registration (ICCPR Article 24(2); CRC Article 7), non-discrimination (ICCPR Articles 2 and 26; ICESCR Article 2; CRC Article 2), and access to essential services such as health (ICESCR Article 12), education (ICESCR Article 13), and social security (ICESCR Article 9).¹²³

In its General Comment No. 25, the CRC Committee further clarifies that States must design the digital environment so that all children can safely and effectively access essential digital public and educational services without discrimination and that States should take all measures necessary to overcome digital exclusion.¹²⁴

UNHCR's submission to the 49th Session of the UPR on Kyrgyzstan notes that, despite important progress, procedures relating to statelessness remain complex and document-heavy.¹²⁵ UNHCR reports that the process of confirming statelessness and acquiring nationality 'is often complicated due to the requirement of certain documents, such as confirmation from the country of birth or former residence that the person is not a national of that country and, in some cases, bank certificates to prove solvency'. It recommended establishing a formal Statelessness Determination Procedure, expediting naturalization, and improving documentation to ensure effective access to rights for stateless people.¹²⁶

Designed to Include? The Impact of Digital ID and Legal Identity on Citizenship and Nationality Rights

Available information does not indicate that digital identity has directly reduced statelessness in Kyrgyzstan. Efforts to prevent and reduce statelessness have primarily relied on conventional civil registration, confirmation of nationality, and issuance or replacement of physical documents, while digital ID has been layered on top of this existing infrastructure.

For stateless persons, the digital identity ecosystem institutionalizes pre-existing administrative exclusion. The Law of the Kyrgyz Republic on Citizenship (2007) empowers authorities to determine citizenship or stateless status of persons permanently residing in the country and provides, at least on paper, a pathway to documentation and naturalisation for stateless individuals, subject to certain prerequisites.¹²⁷

UNHCR reports show that thousands of people previously at risk of statelessness were identified and granted nationality in earlier campaigns, but that

procedures remain complex and document-heavy, often requiring proof from the country of birth or former residence that the person is not a national, as well as bank certificates to demonstrate solvency¹²⁸.

In this context, digital ID does not create statelessness in a formal sense. However, the requirement to possess a PIN, biometric record and national ID card as preconditions for full participation in the digital ecosystem means that failure to resolve statelessness or documentation gaps translates into continuing exclusion from digital channels and, by extension, from many state-sponsored services that are being digitised.

Digital platforms now consolidate services such as replacement of ID cards, access to digital passports and driver's licenses, vehicle registration certificates, children's birth certificates, social-benefit statements and digital health profiles. While some online registration functions in Public Service Centers have recently been opened to foreign nationals without prior Tunduk registration, there is no clear evidence that stateless persons can obtain full digital credentials or that digital channels are systematically adapted to the barriers they face.

As a result, those who remain undocumented or stateless are effectively limited to ad hoc analog processes and legal-aid pathways, even as more services migrate to digital platforms.

Within the digital ID framework, Kyrgyzstan has not introduced dedicated measures to facilitate access for stateless persons or other marginalized groups. Possible measures could include tailored mobile enrollment, relaxed documentation thresholds for ESI registration, or explicit provisions recognizing a status-neutral right to basic digital services. Instead, the main special measures targeting statelessness have taken place in the sphere of civil registration and nationality. These include nationwide identification and documentation campaigns,

KYRGYZSTAN

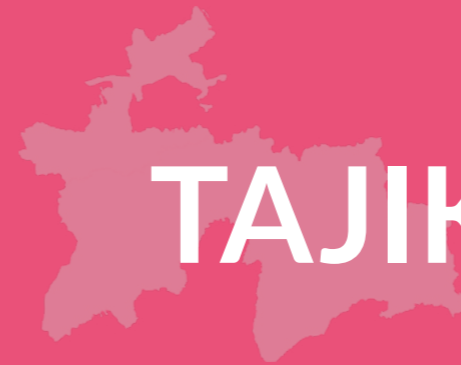
cooperation with legal clinics and NGOs, and plans to establish a formal Statelessness Determination Procedure.¹²⁹ However, such measures are not explicitly integrated into the rules governing Tunduk, biometric registration, or the issuance and use of digital ID cards.

To align the digital identity ecosystem with Kyrgyzstan's international obligations on non-discrimination, birth registration and access to essential services, the legal and policy framework would need to move towards inclusion.

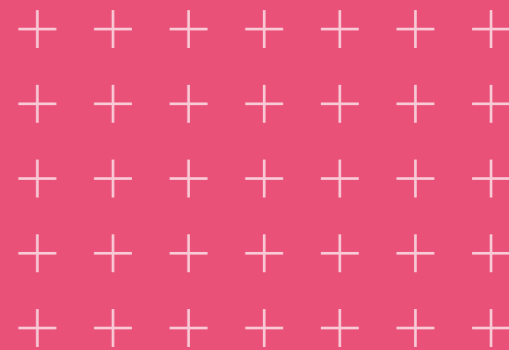
Integrating forthcoming Statelessness Determination Procedures with clear entitlements to identity documentation and core e-services for recognised stateless persons is one possible path forward.



Photo: Dilshod Hojiboev



TAJIKISTAN



Tajikistan

Legal Identity

The Law of the Republic of Tajikistan on Identity Documents, No. 1097 of 26 July 2014 (Identity Documents Law), defines 'identity documents' as documents of an approved form with personal data that allow identification of the person and their legal status.¹³⁰

Under this law, some of the recognized documents, among others, are – internal passport or electronic ID card of the citizen of the Republic of Tajikistan, all-civil foreign passport of the citizen of Tajikistan, birth certificate, certificate of the stateless person, residence permit for foreign citizens and for stateless persons in Tajikistan, refugee certificate and temporary certificate of person seeking asylum.¹³¹ Legal identity is established through a combination of birth registration and registration of identity documents (such as, passport and ID card).¹³²

The Ministry of Justice civil registration offices (ZAGS) and jamoat (municipality)-level offices are responsible for state registration of births and other vital events.¹³³

The legal time limit for birth registration is three months after birth, with a small fee for registration.¹³⁴ Birth registration constitutes a basic form of legal identity for an individual, but on its own it does not confer or conclusively prove Tajik citizenship.¹³⁵ The Identity Documents Law lays down the types of identity documents and provides the basis for their registration, issuance, replacement, recovery, cancellation, delivery, withdrawal and destruction.¹³⁶ The 2013 Presidential Decree on ID-cards (reported in 2014) mandated issuance of electronic identification cards for citizens from 1 March 2014 as identity documents.¹³⁷

In 2020, Tajikistan adopted the Law of the Republic of Tajikistan on Amnesty Related to Legalization of Stateless Persons and Foreign Nationals Illegally Residing in the Territory of the Republic of Tajikistan (2019) to regularise foreign nationals and stateless persons irregularly residing in the country, allowing them to obtain residence permits and, later, potentially citizenship; these permits give them legal status and access to rights.¹³⁸

Overview of Digital ID

There is a state-linked digital identity credential via the IMZO mobile application, described as 'Digital Identification and Electronic Signature for Citizens of Tajikistan,' used to verify identity online using a national ID and access government portals.¹³⁹ IMZO works as a functional digital ID layer on top of the foundational ID system to provide online authentication and electronic signatures for accessing services.¹⁴⁰ According to IMZO's official app description, the app can be used to secure online identity verification using the national ID, digital electronic signature for signing official electronic documents, and single sign-on (SSO) and authentication for different digital platforms and apps.¹⁴¹ IMZO can also be used to access several state platforms, such as - Yagona (unified public services portal), Hukumat (local government services), services of the Ministry of Justice and notaries, police or traffic police (GAI) and other administrative authorities.¹⁴²

Available information on IMZO states that it 'enables citizens of the Republic of Tajikistan to access digital government services' and it is known as the 'Digital Identification and Electronic Signature for Citizens of Tajikistan'.¹⁴³ There is no explicit mention in publicly accessible information that foreign citizens, refugees, or stateless persons can register for IMZO or obtain a similar digital credential.

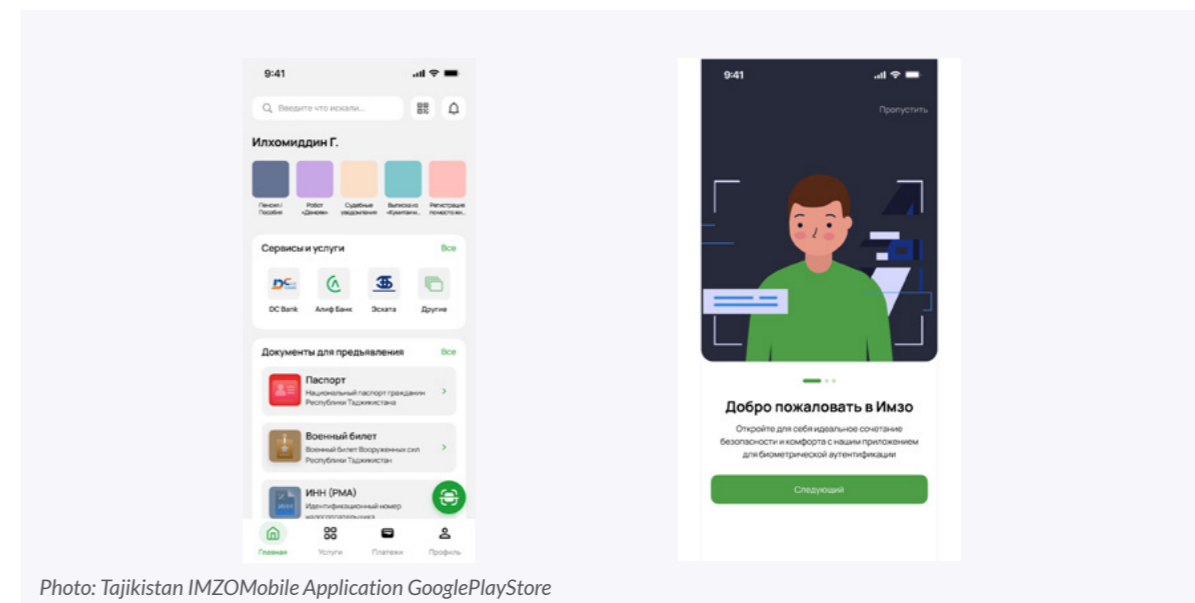


Photo: Tajikistan IMZOMobile Application GooglePlayStore

With regard to the development of digital public infrastructure in the country, the World Bank's Tajikistan Digital Foundations Project (approved December 2024) aims to 'enhance digital services and improve digital skills,' strengthening digital public infrastructure and legal or regulatory frameworks for digital transactions.¹⁴⁴

Available information does not provide information on a dedicated national e-ID scheme presently. Additionally, the President has declared 2025–2030 as the 'Years of Digital Economy and Innovation Development,' with instructions to develop an action plan to accelerate digitalization. However, no detailed public plans have yet been released specifying an expanded digital ID regime.¹⁴⁵

Laws

Domestic Law and Policy

Tajikistan does not yet have a single, consolidated digital ID law. Instead, there are certain laws which are relevant to digital identity. For example, The Law About The Electronic Document (2014) sets the legal basis for electronic documents.¹⁴⁶ It

requires that such documents contain identifying details and include electronic digital signatures or other means of verifying the originator.¹⁴⁷ It equates electronic documents with physical documents for legal purposes and governs their creation, processing, transfer and storage.¹⁴⁸

The government adopted a 'Concept of the Digital Economy,' a framework which includes: creating a public system to identify entities of information relations focused on the provision of digital services, providing authorised access to information, and establishing a Single Public Services Portal as part of the transition to digital government.¹⁴⁹ It envisages integration of departmental information systems through a national platform and cloud infrastructure.¹⁵⁰

In 2025, based on a resolution and implementing order, the government began shifting pensioners to a digital identification system based on facial recognition (Face ID), requiring pensioners to complete biometric verification via a mobile app where their photo and passport data are uploaded.¹⁵¹

There is no available information relating to grievance redressal in case of misuse or disputes

relating to electronic documents/signatures or digital ID. The Agency for Innovation and Digital Technologies is tasked with managing e-government, regulating the provision of digital public services, circulation of electronic documents and use of electronic signatures.¹⁵² Its mandate includes oversight of the unified contact centre for public services and public service centers, which indicates that citizens may submit service-related complaints through this channel.¹⁵³

Data Protection

Tajikistan has a dedicated Law of the Republic of Tajikistan On Personal Data (2018) ('Personal Data Law').¹⁵⁴ The law sets general rules for collection, processing, storage and protection of personal data, and designates a state body for personal data protection and information security.¹⁵⁵ The Personal Data Law requires that personal data be collected and processed on a lawful basis, for specified purposes, and that measures be taken to prevent unauthorized leakage, copying, theft, alteration, disclosure or destruction.¹⁵⁶ The Personal Data Law requires operators to take 'measures' to protect personal data from unauthorized access, leakage, copying, theft, loss, alteration, disclosure or destruction.¹⁵⁷ Based on publicly available information, there is no explicit requirement that personal data, including Digital ID data, must be encrypted or that particular cryptographic standards be used.¹⁵⁸

There is limited information available on the breach of privacy and issues of surveillance in the country in relation to ID systems. It should be noted that the new 'Face ID' based digital registration of pensioners requires uploading facial images and passport data into a central system via mobile devices, enabling potential cross-checking against other databases or CCTV without any visible independent oversight regime.¹⁵⁹

The lack of legal constraints on government access to identity data creates structural risks of function creep (a gradual increase in using the system beyond the purpose for which it was originally intended), profiling, and unchecked monitoring. Regional digital rights observers warn against increasing adoption of facial recognition and integrated identity systems without adequate privacy impact assessments or public debate.¹⁶⁰

International Commitments

There is no evidence that Tajikistan is party to any multilateral treaty whose primary subject matter is 'digital identification' or 'e-ID'. Tajikistan is also not subject to the EU GDPR or any EU adequacy regime, and there is no evidence of membership in OECD data-protection treaty frameworks. Tajikistan has not ratified the 1954 or 1961 Statelessness Conventions. However, its Constitutional Law on the Legal Status of Foreign Citizens and Stateless Persons and the Amnesty Law (2019) create domestic mechanisms for regularization and documentation of stateless persons.¹⁶¹

As a signatory, the country is obliged to ensure birth registration (ICCPR Article 24(2); and CRC Article 7), non-discrimination (ICCPR Article 2, 26; ICESCR Article 26; and CRC Article 2), and access to essential services like health (ICESCR Article 12), education (ICESCR Article 13), and social security (ICESCR Article 9).¹⁶² Furthermore, in its General Comment No. 25, the CRC Committee states that digital systems should be created such that they enable all children to safely access essential digital public services and educational services without discrimination.¹⁶³

Moreover, in 2024 the CEDAW Committee's concluding observations (seventh periodic report), explicitly recommended ensuring that stateless women, women of undetermined nationality and women at risk of statelessness and their children have adequate access to identity documents,

*justice, employment, health care, housing and social protection.*¹⁶⁴

Designed to Include? The Impact of Digital ID and Legal Identity on Citizenship and Nationality Rights

Tajikistan's digital identity framework is not fully developed. Information suggests that the IMZO application is tied to formal citizenship status, with no standalone, fully integrated digital ID system that is accessible to stateless persons as a distinct category.¹⁶⁵ Government-issued identity documents for citizens are conferred only after proof of Tajik nationality, while stateless persons are documented under a separate legal track via a 'certificate of the stateless person' and a 'residence permit for the stateless person' under the Law on Identity Documents (2014).¹⁶⁶

Stateless individuals in Tajikistan who have not secured a residence permit or stateless certificate face systematic barriers to state-sponsored basic services because those services generally require a valid, state-issued identity document and residence registration.¹⁶⁷ Without such documentation, they are at risk of exclusion from formal employment, social insurance, public healthcare beyond emergency care, and full access to education. Additionally they are also at risk of being arrested and detained for irregular stay.¹⁶⁸ Stateless persons who obtain a residence permit can, in principle, access healthcare, education and certain social services. There is no information available regarding alternatives to digital-only channels that allow undocumented stateless persons to bypass the documentation requirement to access core public services.

The IMZO application has not, in itself, reduced statelessness in Tajikistan. Legal identity reforms and nationality grants remain the primary

mechanisms for addressing statelessness in the country. The Amnesty Law (2019) and subsequent regularization drives, have been the key factors in resolving the status of large numbers of stateless and undocumented persons, substantially reducing the incidence of statelessness in the country by providing pathways to citizenship.¹⁶⁹

Nevertheless, Digital ID could support future statelessness-reduction efforts, but only if it is explicitly designed to be inclusive of stateless populations and integrated with broader legal recognition and naturalization frameworks.



Turkmenistan

Legal Identity

In Turkmenistan, the internal passport is the primary proof of legal identity.¹⁷⁰ The internal passport is an identity document used for identification and residence registration within Turkmenistan and is distinct from the biometric passport used for international travel.¹⁷¹ Citizens aged 16 and above can apply for the internal passport for identification purposes within Turkmenistan. For children under the age of 16, the birth certificate serves as the document confirming identity and citizenship.¹⁷² For stateless individuals, the Stateless Person's Certificate serves as the primary ID document, recognized for official purposes.¹⁷³ Documented stateless persons are issued this certificate by the State Migration Service, and it allows them to reside legally in Turkmenistan, move freely within the country, and access legal employment including public services such as healthcare.¹⁷⁴

The Law on Acts of Civil Status (2019) ensures universal birth registration in the country.¹⁷⁵ Births must be registered with the ZAGS (civil registration bodies) which transfer the birth registration data to the State Migration Service within 24 hours.¹⁷⁶ There is limited publicly available information on the process of applying for the internal passport.

Stateless individuals and foreigners who are above the age of 18 can also apply for a residence permit in the country.¹⁷⁷ This is valid for a period of up to five years.¹⁷⁸ The residence permit is a separate document from the Stateless Person's Certificate: the latter is an identity document evidencing recognized stateless status, while the residence permit regulates the duration and conditions of residence. It is governed by specific decrees on residence permits and the replacement of earlier-format stateless persons' certificates.¹⁷⁹

Citizenship in Turkmenistan is based on the requisite citizenship law of the country, not by possession of identity documents. Identity documents confirm or prove citizenship but do not constitute it.¹⁸⁰ For stateless individuals, the law provides for a pathway to citizenship through naturalisation based on fulfilling requisite conditions.¹⁸¹ A person must be 18 years old, have lived in the country for the past five years, have a legal source of income, knowledge of the Turkmen language and absence of specified criminal convictions.¹⁸²

Overview of Digital ID

Turkmenistan has not implemented a digital ID system yet, but the Concept for the Development of the Digital Economy of Turkmenistan for 2021–2025 discusses the creation of a Unified Identification and Authentication System (UIAS) as a national priority to allow 'authorized access of participants... to state electronic resources'.¹⁸³

The framework also mentions the creation of the System of Interdepartmental Electronic Interaction (SIEI) – 'an information system that allows central, regional and local authorities of the country, credit institutions and other SIEI participants to exchange data necessary for the provision of public services to citizens and organizations in electronic form'.¹⁸⁴ A subsequent framework, Concept for the Development of the Digital Economy in Turkmenistan for 2026–2028, has also been outlined.¹⁸⁵

In addition, the State Program for the Development of the Digital Economy in Turkmenistan for 2026–2028 and the Action Plan for its implementation were approved in January 2026.¹⁸⁶ There is limited publicly available information on these government policies and the progress that has been made in the implementation of these programs and development of digital public infrastructure in Turkmenistan.

TURKMENISTAN

UNDP's 2024 assessment notes past digital efforts have been 'fragmented, with isolated projects lacking a cohesive strategy'.¹⁸⁷ The report highlights gaps such as limited interoperability between government databases, insufficient digital public services.¹⁸⁸ It also notes the need for stronger institutional coordination, legal frameworks, and digital infrastructure to support e-government and digital public services.¹⁸⁹

Laws

Domestic Law and Policy

Turkmenistan does not have a dedicated digital identity law or a comprehensive digital ID system. The country has laws governing electronic documents, e-government, data protection, and physical identity documents.

The *Law On Electronic Document, Electronic Document Management and Digital Services (2020)* establishes legal status of electronic documents, digital signatures, and digital services; it defines personal data but does not create a digital ID system.¹⁹⁰ The *Law On Electronic Government (2022)* creates a framework for the operation of e-government and was developed to facilitate the implementation of the Concept for the Development of the Digital Economy in Turkmenistan.¹⁹¹ There is limited publicly available information on the implementation of the e-government infrastructure.¹⁹²

Turkmenistan does not legally define digital identity as a distinct concept in any domestic law or policy. The closest definition is that of electronic document which is defined in *Law On Electronic Document, Electronic Document Management and Digital Services* as 'the document prepared... in electronic form on the basis of information technologies, having content, provided in electronic and digital form on the electronic

medium in which information is fixed in the form of electronic data and which authenticity is certified by means of the digital signature'.¹⁹³ Similarly, the *Law On Information on Private Life and Its Protection (2017)* defines 'personal data' as 'any data relating to the physical person determined or determined based on such data, fixed on electronic, paper or other material medium,' and 'biometric data' as 'data characterizing physiological and biological features of the person and allowing to identify the personality'. Neither term, however, establishes a digital identity framework.¹⁹⁴

Data Protection

*Turkmenistan's main data and privacy instrument is the Law On Information on Private Life and Its Protection (2017).*¹⁹⁵

The 2017 law establishes general principles: purpose limitation, consent for collection and processing, and obligations on 'operators' (controllers) to protect personal data from unlawful access, modification, disclosure or destruction. The 2017 law expressly defines 'biometric data' as data reflecting physical and biological characteristics that allow identification of a person.¹⁹⁶ Biometric data falls within 'information on private life (personal data)' and are, in principle, protected by the same consent, purpose-limitation and security-obligation provisions.¹⁹⁷

The aforementioned 2017 law requires operators to take necessary organizational and technical measures to protect personal data.¹⁹⁸ It allows disclosure of personal data to state bodies where required by legislation. It therefore does not contain a general prohibition on government access to personal data used for ID purposes.¹⁹⁹ Reports state that Turkmenistan has a system of extensive surveillance.²⁰⁰

This raises concerns that personal data (as that could be used in digital ID systems) could be used to track

*individuals' movements, communications or service usage, when such digital public infrastructure is formally established.*²⁰¹

International Commitments

Turkmenistan is not a party to any international framework, agreement, or treaty setting obligations on digital IDs. Turkmenistan has ratified ICCPR, ICESCR, CEDAW, CRPD, CRC, CERD, 1951 Refugee Convention and 1967 Protocol, 1954 Statelessness Convention, and 1961 Reduction of Statelessness Convention.²⁰²

*As a signatory, the country is obliged to ensure birth registration (ICCPR Article 24(2); and CRC Article 7), non-discrimination (ICCPR Article 2, 26; ICESCR Article 26; and CRC Article 2), and access to essential services like health (ICESCR Article 12), education (ICESCR Article 13), and social security (ICESCR Article 9).*²⁰³

Furthermore, in its General Comment No. 25, the CRC Committee states that digital systems should be created such that they enable all children to safely access essential digital public services and educational services without discrimination.²⁰⁴

Designed to Include? The Impact of Digital ID and Legal Identity on Citizenship and Nationality Rights

Since digital public infrastructure is at the nascent stage in the country, there is no evidence that indicates that digital ID contributes to or reduces statelessness in Turkmenistan. Stateless individuals with recognized status can access most basic services using their Stateless Person Certificate.²⁰⁵ The current policy and legal framework provide a pathway to citizenship for stateless individuals, through permanent residency in the country.²⁰⁶ However, stateless

persons cannot access the 'propiska' system, which requires every adult and household to prove ownership of a place of permanent residence, in order to access certain social services and benefits.²⁰⁷ This, therefore, limits their access to some state insurance and allowances, such as maternity, child support, and pension payments.²⁰⁸

The National Action Plan to End Statelessness (2019-2024) eradicated known cases of stateless persons and refugees, resolving all identified instances by September 2024.²⁰⁹ UNHCR has praised Turkmenistan's leadership, noting synergy with ID registration modernization, birth registration laws, and ratification of UN conventions.²¹⁰ A future digital ID, if developed, could support ongoing prevention if it is designed inclusively with safeguards for stateless persons, residence-based enrollment, and integration into civil registration.²¹¹



Uzbekistan

Legal Identity

According to the guidelines of the Government portal of the Republic of Uzbekistan 'On the birth registration procedure' (Birth Procedure), legal identity begins with the registration of a child's birth at the Civil Registry Office (CRO).²¹² Registering a child's birth is mandatory and can be done by parents or authorized persons who submit an application either orally or in writing within one month from the date of birth.²¹³

However, if the parent(s) do not have required documents, the CRO cannot refuse to register the birth.²¹⁴ Parents can produce alternative documents such as a marriage certificate, birth certificate of other children to register a birth. In a few cases, court decisions have been used to register birth requirements.²¹⁵

Therefore, a medical certificate to confirm birth, passports or equivalent identity documents of parents and marriage certificate or paternity acknowledgment or maternity declaration is required to obtain the birth certificate.²¹⁶

In efforts to improve civil registration services, from 2023 onwards, parents are issued a QR Code which has replaced traditional stamped birth certificates.²¹⁷ Births are registered at hospitals and medical institutions. ²¹⁸

In accordance with Article 7 of 'On Citizenship of the Republic of Uzbekistan' (2020) (referred to hereafter as Law on Citizenship'), the official proof of legal identity in the Republic of Uzbekistan includes a passport, an identification card (ID card), or other official documents confirming citizenship, such as a driver's license or a military service card.²¹⁹

For children under the age of 16, a birth certificate serves as the official document verifying both legal identity and citizenship status in accordance with national law, and for children whose parents are stateless, a birth certificate along with parent(s) residence permits forms the legal identity.²²⁰

It should be noted that driver's license (since 2019) also constitutes a valid legal identity document in the country after the Decision of the Cabinet of Ministers of the Republic of Uzbekistan 'On Measures to Further Improve the Quality and Simplify Procedures for the Provision of State Services in the System of Internal Affairs Agencies'.²²¹

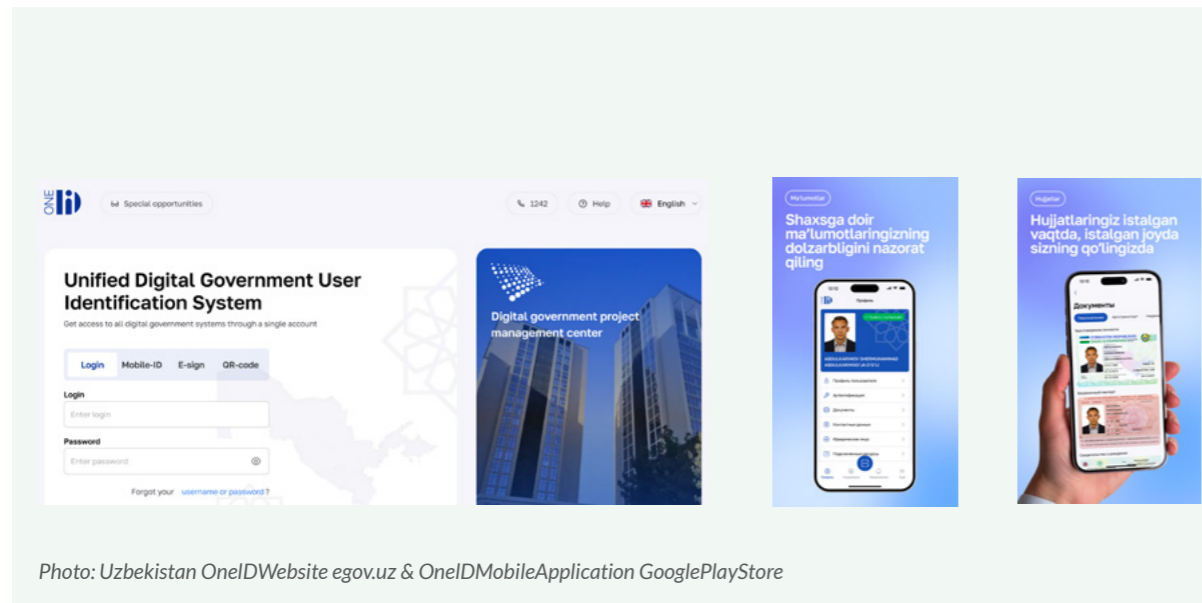
Upon reaching the age of 16, citizens of Uzbekistan can also apply for ID Cards, which serves as the primary document confirming both their citizenship and their legal identity.²²² Stateless people permanently residing in the country are also eligible to apply for ID cards, upon attaining the age of 16.²²³

The ID Card also serves as a permanent registration of the ID Card holder to the Republic of Uzbekistan in the form of an electronic chip, which includes the biometric data of citizens, non-citizens, as well as stateless persons.²²⁴

Article 5 of 'On the Legal Status of Foreign Citizens and Stateless Persons in the Republic of Uzbekistan' (2021) clarifies that all stateless persons in the country are equal before the law and will have rights in accordance with the Constitution as well as international laws applicable to the Republic.²²⁵ The digital authentication services, too, are applicable to stateless persons in the country.²²⁶



UZBEKISTAN



Digital ID Overview

As a part of its digital initiative, Uzbekistan has digitized its identity documents under its broader legal identity framework to ensure streamlined, secure, and universal access to online public and commercial services.²²⁷ This process has been designed to allow residents to authenticate themselves on websites and portals operated by state administration bodies, local self-government, and commercial entities.

As noted, the planned official recognition of fully electronic identity documents from 1 July 2025 reflects the Government's aim to enhance digital governance and simplify identity verification processes.²²⁸ Documents such as passports, driver's licenses, residence permits, birth certificates, disability certificates, among others have been digitized and can be accessed through the Unified Portal of Interactive Government Services (UPIGS) and government portal, known as 'my.gov.uz'.²²⁹ These digitized IDs are accepted for domestic flight check-ins, trains, banks, notaries, among others.²³⁰

The country, however, does not host a complete digital ID system yet.²³¹ The government has developed the eID system, which is an

authentication and sign-on platform for e-government services.²³²

It is also integrated with other services provided by the state organizations, including local authorities, and hosts close to 12 million users.²³³ Uzbekistan's eID system could be categorized as both foundational and functional ID since this singular system can be used to authenticate an individual's legal identity as well as access a range of public and commercial services online.

Under the law of Uzbekistan, there are alternative ways of accessing e-government services besides using digital identification tools such as the Unified Identification System (OneID) or electronic digital signature (EDS). NFA's stakeholder contributor from Uzbekistan confirms that individuals can still access many public services through in-person visits to Public Service Centres (Davlat xizmatlari markazlari) established under the State Services Agency, by submitting paper documents, or, in some cases, through phone or SMS-based channels, depending on the nature of the service and its digitalisation status.²³⁴ Importantly, stateless persons permanently residing in Uzbekistan are issued ID Cards and can, in theory, get access to the eID system.²³⁵

However, to meet the conditions to be eligible for ID cards, foreign citizens or stateless persons must have resided permanently in Uzbekistan for the last 5 years and have submitted an application for admission to citizenship including declaration of one's recognition of the Constitution of the Republic of Uzbekistan, being able to speak the state language, and renunciation of foreign citizenship (if applicable).²³⁶

Laws

Domestic Law and Policy

Uzbek law does not define digital ID and there is no single standalone law that pertains to digital ID. The Strategy Digital Uzbekistan-2030, adopted in 2020, along with subsequent presidential acts set out the national vision for e-government and digital public services.²³⁷ A key building block is the Law on Electronic Digital Signature (2023), which grants legal validity to e-signatures and allows citizens, non-residents, and stateless persons to obtain them, including through consulates abroad.²³⁸ Another central component is OneID, the government's Single Identification System that functions as the cross-agency authentication and authorization service for users of e-government platforms such as my.gov.uz.

This system was further integrated from July 1, 2025 when electronic versions of identity documents (such as passports, ID cards, and driver's licenses) presented through approved apps are legally recognized as equivalent to paper originals.²³⁹

The law 'On Electronic Government' (2015) also establishes the legal basis for providing public services electronically, including requirements for digital identification and interoperability.²⁴⁰ In terms of filing grievances and complaints, there is an online feedback mechanism and help desk support for users to resolve technical issues related to the Digital ID system.²⁴¹ Furthermore,

legal protections, such as the law On Data Protection (2019) (referred to hereafter as Data Protection Law'), outline citizens' rights to challenge incorrect data or misuse of their digital identity in court.²⁴²

Data Protection

Uzbekistan's Data Protection Law, in force since 2019, regulates the collection, processing, and protection of personal data, including data processed within the Digital ID system.²⁴³ Some of the safeguards existent in the Data Protection Law include collecting and processing data fairly, for specific legitimate purposes, subject to the principles of data minimization and informed consent.²⁴⁴ The law provides special protection for biometric data such as fingerprints, facial recognition data, treating it as sensitive personal data, but does not mandate encryption.²⁴⁵ Explicit consent is required for the collection of such personal information, and additional security measures must be taken to safeguard this information.²⁴⁶

While the government cannot outrightly access personal data for any purpose, there are specific cases in law which justify the access of personal data, such as in the cases of national security, provided written consent of the individual is obtained, if the data is already publicly available, during criminal proceedings, among other cases.²⁴⁷

However, Amnesty International has reported pervasive surveillance being conducted both within the country and internationally by Uzbekistan.²⁴⁸ The Report highlights the targeting of human rights defenders, journalists, and even refugees abroad, showcasing how the government monitors communications without proper legal safeguards.²⁴⁹

Such practices undermine freedom of expression, privacy, and safety inside and outside Uzbekistan, and demand urgent reform to bring surveillance laws

*in line with international human rights standards.*²⁵⁰

International Commitments

Uzbekistan is not a party to any international treaty that specifically regulates digital identity systems. Nonetheless, the country has sought to align its legal identity framework with international best practices by referencing the UN Sustainable Development Goals, particularly SDG Target 16.9, which calls for 'legal identity for all, including birth registration'.²⁵¹ Additionally, Uzbekistan has ratified several human rights treaties, including the ICCPR, ICESCR, CRC, CERD, and CEDAW.²⁵² The ICCPR enshrines the right to privacy and restricts the use of personal data to lawful and proportionate purposes.²⁵³ The ICESCR and CERD both guarantee equality and non-discrimination in access to essential rights and services.²⁵⁴ There are, however, concerns that Uzbekistan's OneID system may exclude stateless persons who do not hold the necessary documentation, from accessing its services.²⁵⁵ Without access to OneID, stateless individuals risk being denied essential state-sponsored services, raising potential violations of Uzbekistan's obligations under the ICESCR and CERD.²⁵⁶

*On 26 June 2025, Uzbekistan adopted the Ministerial Declaration on a Decade of Action for Inclusive and Resilient Civil Registration and Vital Statistics in Asia and the Pacific, pledging commitments to universal access, gender equality, digital inclusion, and resilient CRVS systems.*²⁵⁷

The Declaration commits to building secure digital public infrastructure that enables equitable access to services and entitlements, while ensuring that 'vulnerable and digitally marginalized groups' are not excluded.²⁵⁸

Designed to Include? The Impact of Digital ID and Legal Identity on Citizenship and Nationality Rights

Currently, the digital ID system is not functional in Uzbekistan, so it is difficult to ascertain the impact that the system will have on stateless populations, when in force. Foreign citizens and stateless persons with legal residence in Uzbekistan may obtain OneID after obtaining a Personal Identification Number (PINFL).²⁵⁹ This unique personal identification number is required to access e-government services such as visa extensions, residency permits, tax registration, banking and financial services, official transactions requiring electronic digital signatures, among others.²⁶⁰ While documents suggest that a PINFL can be issued through Public Service Centers in-person²⁶¹, but the procedure requires documentation that may not otherwise be accessible to stateless persons.²⁶²

There are also concerns raised by Freedom House that notes that Uzbekistan is an authoritarian State, where the judiciary and legislature are not free, but 'serve as instruments of the Executive branch'.²⁶³ Despite internet freedom having improved modestly year-on-year, the environment is still rated among the worst globally due to routine blocking and excessive surveillance.²⁶⁴

Amnesty International has also documented the mass surveillance carried out by the State, for those in political opposition, whether they were human rights defenders, members of opposition, or refugees.²⁶⁵ This history, combined with the continued centralization of power in the Executive branch, deepens concerns about the risks of introducing digital ID systems in illiberal regimes.

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