

To: [Recipient Name/Data Protection Officer]

From: [Organization Name]

Date: [Insert Date]

Subject: Jurisdictional Risk Assessment (JRA) for Biometric Data Export

Dear [Name],

This letter provides the Jurisdictional Risk Assessment regarding the transfer of biometric data from [Exporting Country] to [Importing Country]. This assessment evaluates whether the destination country provides a level of protection essentially equivalent to that guaranteed under [Applicable Law, e.g., GDPR].

1. Description of the Transfer

The transfer involves biometric data, specifically [e.g., facial templates, fingerprints], for the purpose of [e.g., identity verification, access control]. The data is transferred to [Service Provider Name] located in [Importing Country].

2. Legal Framework of the Importing Country

We have reviewed the following legal aspects of [Importing Country]:

- Existence of comprehensive data protection laws.
- Powers of independent supervisory authorities.
- The existence of laws governing government access to private sector data (e.g., national security and surveillance laws).

3. Assessment of Risk

Based on our review, the following risks have been identified:

[Insert specific risks, e.g., potential for broad government access or lack of judicial redress].

4. Supplementary Measures

To mitigate identified risks, the following safeguards have been implemented:

- **Technical:** [e.g., End-to-end encryption, pseudonymization of templates].
- **Contractual:** [e.g., Standard Contractual Clauses, mandatory notification of government access requests].
- **Organizational:** [e.g., Strict internal access controls and audit trails].

5. Conclusion

It is our assessment that with the aforementioned supplementary measures, the biometric data is afforded an adequate level of protection during and after the transfer process.

Sincerely,

[Signature]

[Name and Title of Authorized Representative]