Apartheid in Your Pocket: How Microsoft powers Al Munasseq, Israel's permit app

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Executive summary

> “I felt nervous, anxious, and deeply afraid, afraid for myself, for my personal information and data, and for being placed under surveillance. I was also worried about my family members, my husband, sons, and daughters. I feared that the Israeli occupation authorities would permanently know my place of residence, my location, my identity, and all details related to my life.” – a Palestinian woman that Ekō interviewed for this report, on downloading Al Munasseq.

For millions of Palestinians in the occupied Palestinian territories (OPT) the way to a hospital, a job, a relative or a mosque in Jerusalem is run through a single app. It is called Al Munasseq – Arabic for “the Coordinator". It was launched by Israel’s Coordinator of Government Activities in the Territories (COGAT), the Israeli Ministry of Defence body that administers Palestinian life under occupation.[1] And according to research from Who Profits as well as whistleblower evidence that Ekō was able to obtain as part of a GDPR complaint, it runs on Microsoft’s cloud.[2]

Al Munasseq is the digital front end of Israel’s permit regime, the bureaucracy that decides which Palestinians may move, where, when, for how long and for what purpose. By April 2026 it had been downloaded more than one million times from the Google Play store alone.[3] Palestinians interviewed for this report described having no real alternative. As one put it: “we are controlled and not free to choose.”

Through Al Munasseq, Palestinians apply for permits to work, receive medical treatment, trade or pray. They book appointments for their biometric scan, at which Israeli authorities fingerprint and photograph them for the biometric cards they need to pass checkpoints. They learn whether they have been approved or rejected — usually without being told why — and many discover through the app that they are subject to a “security ban” they cannot see the evidence for and have no effective way to challenge. Since 2024, holders of several types of permit have had to prove they returned to the West Bank on time, either at a checkpoint kiosk or by submitting a selfie through the app with their phone’s location switched on.[4]

When Israel withdraws permission, the app is where it disappears. On 11 October 2023, workers from Gaza who were lawfully in Israel found that their permits had been revoked and

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[1] Israel, Coordination of Coordination of Government Activities in the Territories, *About Coordination of Coordination of Government Activities in the Territories* (25 May 2020), https://www.gov.il/en/pages/aboutcogat.
[2] Who Profits - Microsoft: https://www.whoprofits.org/companies/company/7371; Irish Council for Civil Liberties, Complaint Against Microsoft Ireland Operations Limited’s Unlawful Processing in Support of Unlawful Israeli Activities (3 December 2025) https://www.iccl.ie/wp-content/uploads/2025/12/REDACTED-ICCL-GDPR-DPC-complaint-Microsoft.pdf
[3] Google Play, *AlMunasseq*, by EvenDigital (version consulted: version 3.3.1, updated on 26 March 2026), https://play.google.com/store/apps/details?id=com.evendigitals.elMunasseqek&hl=en-US.
[4] Israel, Ministry of Defence, *Subject: Reporting procedure back to the Judea and Samaria region “closing the circle”* (27 June 2024), https://www.gov.il/he/pages/judea-samaria-reporting-procedure [Hebrew].

every record of them erased from Al Munasseq.[5] Stripped of proof of their legal status, thousands were detained, held incommunicado and subjected to torture and other ill-treatment.[6]

To use the Application, Palestinians must grant it access to their location, camera, files and more. Its privacy policy allows their data to be shared in response to "governmental authority requests, including security authorities".[7] A technical analysis of the app's permissions, carried out for this report by technology experts and set out in the Annex, found that it requests far more than a permit tool needs — including advertising-tracking identifiers, silent reading of identity-card chips and the ability to run continuously and restart whenever the phone is switched on — and rated the practical risk to users as high. Palestinians told us they stopped taking photos on phones that carried the app. Some threw their phones away.

One system of apartheid

The permit regime is not a set of stand-alone security measures. It is an essential part of a much more violent system — Israel's apartheid against the Palestinian people, an institutionalised regime of oppression and domination that operates wherever Israel controls Palestinian lives. It governs Palestinians in the West Bank, including East Jerusalem, and in Gaza through military occupation and annexation; Palestinian citizens of Israel through discriminatory law; and Palestinian refugees through the denial of their right to return. Amnesty International reached this conclusion in 2022,[8] and Ekō shares it.

International bodies have also reached the same conclusion about the territory where Al Munasseq operates. In 2024, the International Court of Justice (ICJ) found that Israel's legislation and measures in the West Bank and East Jerusalem breach Article 3 of the International Convention on the Elimination of All Forms of Racial Discrimination, which prohibits racial segregation and apartheid.[9] In 2025, the UN Committee against Torture found that Israel's system of movement restrictions maintains a near-complete separation between settlers and Palestinians, "violating the prohibition of racial segregation and apartheid".[10]

This report documents how that system works in the territory Israel has occupied since 1967, because that is where Al Munasseq is used. That focus reflects the research we've done and

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[5] Gisha, *Secretly and unlawfully, Israel detained thousands of Palestinians from Gaza* (14 December 2023), https://gisha.org/en/secretly-and-unlawfully-israel-detained-thousands-of-palestinians-from-gaza/.

[6] Human Rights Watch, *Israel: Gaza Workers Held Incommunicado for Weeks* (3 January 2024), https://www.hrw.org/news/2024/01/03/israel-gaza-workers-held-incommunicado-weeks.

[7] COGAT, *"Al Munasseq" app privacy policy* (21 January 2024, page last updated 15 February 2024), https://www.gov.il/he/pages/application_privacy_terms [Hebrew].

[8] Amnesty International, *Israel's apartheid against Palestinians: Cruel system of domination and crime against humanity* (1 February 2022), MDE 15/5141/2022, https://www.amnesty.org/en/documents/mde15/5141/2022/en/. See also, B'Tselem, *A regime of Jewish supremacy from the Jordan River to the Mediterranean Sea: This is apartheid* (12 January 2021), https://www.btselem.org/publications/fulltext/202101_this_is_apartheid and Human Rights Watch, *A Threshold Crossed: Israeli Authorities and the Crimes of Apartheid and Persecution* (27 April 2021), https://www.hrw.org/report/2021/04/27/threshold-crossed/israeli-authorities-and-crimes-apartheid-and-persecution.

[9] *Legal Consequences arising from the Policies and Practices of Israel in the Occupied Palestinian Territory, including East Jerusalem (Palestine Advisory Opinion), Advisory Opinion, I.C.J. Reports 2024*, p. 753, para. 229. https://www.icj-cij.org/sites/default/files/case-related/186/186-20240719-jud-01-00-en.pdf

[10] Committee Against Torture, *Concluding observations on the sixth periodic report of Israel,* CAT/C/ISR/CO/6 (22 December 2025), https://www.undocs.org/CAT/C/ISR/CO/6, para. 32.

the interviews we've conducted. It does not mean that Israel's illegal system of apartheid stops at the Green Line.

How the permit regime reaches into every part of Palestinian life

Israel's permit regime determines far more than just where Palestinians can move. Freedom of movement is the gateway to other rights, and for millions of Palestinians In the OPT, Israel has made it a privilege. Whether one is granted a permit decides whether a cancer patient reaches radiotherapy in East Jerusalem, whether a teacher reaches her classroom, whether a worker can feed his family, whether a husband and wife can live under one roof, and whether a believer can pray at Al-Aqsa Mosque. Between 2011 and 2021, Israel denied 331,678 medical permit applications from the West Bank.[11] In 2025, 36% of patients' permit applications for access to East Jerusalem and Israeli health facilities were denied or left pending,[12] and so were 40% of applications from the relatives who accompany them.[13] In January 2026, it refused or curtailed permits for teachers with West Bank IDs at Jerusalem's Christian schools, leaving some schools without nearly 30 per cent of their teaching staff.[14] More than 360,000 jobs have been lost across the occupied territory, including those of 150,000 Palestinians who had worked in the settlements and in Israel since October 2023.[15] In Gaza, at least 1,268 patients have died waiting for permission to be evacuated for treatment.[16]

Each restriction on movement compounds the next, and the harm spills into every area of Palestinian life. Over time, the permit regime makes ordinary life conditional on Israel's permission and works to enforce Israel's domination over Palestinian life. The ICJ has found that "the entire régime of restrictions on the movement of Palestinians throughout the Occupied Palestinian Territory has a discriminatory effect" on their rights to work, health, education, family

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[11] WHO, *Right to Health Barriers to health and attacks on health care in the occupied Palestinian territory, 2019 to 2021* (2023), https://applications.emro.who.int/docs/9789292740887-eng.pdf, p. 49.

[12] UN OCHA, Fact Sheet: Movement and Access in the West Bank, April 2026 (23 April 2026), https://www.unocha.org/publications/report/occupied-palestinian-territory/fact-sheet-movement-and-access-west-bank-april-2026.

[13] WHO, West Bank Health Access, (1 January 2025 - 31 December 2025), https://www.emro.who.int/images/stories/palestine/WB_Health_access_1Jan-31_DEC_25final.pdf.

[14] Daoud Kuttab, Private Christian Schools in Jerusalem Strike over "Humiliation Permits", *Jerusalem Story* (10 February 2025), https://www.jerusalemstory.com/en/article/private-christian-schools-jerusalem-strike-over-humiliation-permits. See also: The General Secretariat of Christian Educational Institutions in Jerusalem, *Statement issued by Christian schools in Jerusalem* (10 January 2026), available via: https://www.aljazeera.net/news/2026/1/11/%d9%85%d8%af%d8%b1%d8%b3%d8%a9-%d9%85%d8%b3%d9%8a%d8%ad%d9%8a%d8%a9-%d8%a7%d9%84%d9%82%d8%af%d8%b3-%d8%aa%d8%b9%d9%84%d9%8a%d9%82-%d8%af%d9%88%d8%a7%d9%85-%d8%a5%d8%b3%d8%b1%d8%a7%d8%a6%d9%8a%d9%84 [Arabic], or https://x.com/IhabHassane/status/2010507756332011789/photo/1 [Arabic].

[15] UN ECOSOC, *Economic and social repercussions of the Israeli occupation on the living conditions of the Palestinian people in the Occupied Palestinian Territory, including East Jerusalem, and of the Arab population in the occupied Syrian Golan*, A/79/975-E/2025/82 (21 July 2025), https://docs.un.org/en/A/79/975, para. 52.

[16] "Gaza child dies waiting for Israeli permission to leave for treatment", *Al-Jazeera* (23 February 2026), https://www.aljazeera.com/news/2026/2/23/gaza-child-dies-waiting-for-israeli-permission-to-leave-for-treatment; Save the Children, *Under the limited opening of Rafah border, urgent medical evacuations would take over a year* (2 February 2026), https://www.savethechildren.net/news/news-quote-under-limited-opening-rafah-border-urgent-medical-evacuations-would-take-over-year.

life and an adequate standard of living.[17] The section “Beyond movement” sets out how these violations accumulate, drawing on the many testimonies of Palestinians who shared their stories.

Microsoft’s role

According to research from Who Profits as well as whistleblower evidence documented through the GDPR complaint filed in December 2025, the Application is hosted on Microsoft Azure. Microsoft provides the underlying and essential computer infrastructure that enables the Application to function. This includes cloud storage and database services used by the Application, which likely means that Palestinians’ data processed through the app could be held on Microsoft hardware. Microsoft’s central processing units and memory execute the Application’s code when someone uses it. Microsoft is also responsible for running the servers to ensure that the Application is available. And according to whistleblower evidence submitted with a complaint to Ireland’s Data Protection Commission (DPC), components of the app are even hosted in Microsoft data centres in Ireland, inside the European Union and subject to EU data protection law.[18] In total, Microsoft provides the underlying and essential components that enable the Application to function.

Microsoft’s ties to Israel’s military run deep, and have for decades. The UN Special Rapporteur on the situation of human rights in the Palestinian territories has found that Microsoft has developed its largest center outside of the United States in Israel, and that “Microsoft has been integrating its systems and civilian tech across the Israeli military since 2003.”[19] A former Microsoft worker told the Associated Press that the Israeli military had more than 635 active subscriptions for Microsoft services.[20]

Microsoft knows what its cloud can be used for in this context. In September 2025, after journalists revealed that Israel’s military intelligence Unit 8200 was storing intercepted Palestinian phone calls on Azure, Microsoft cut off the unit’s access to the services involved.[21]

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[17] *Legal Consequences arising from the Policies and Practices of Israel in the Occupied Palestinian Territory, including East Jerusalem (Palestine Advisory Opinion), Advisory Opinion, I.C.J. Reports 2024*, p. 753, paras. 205-206.

[18] Irish Council for Civil Liberties, Complaint Against Microsoft Ireland Operations Limited’s Unlawful Processing in Support of Unlawful Israeli Activities (3 December 2025), https://www.iccl.ie/wp-content/uploads/2025/12/REDACTED-ICCL-GDPR-DPC-complaint-Microsoft.pdf

[19] Report of the Special Rapporteur on the situation of human rights in the Palestinian territories occupied since 1967, Francesca Albanese, From economy of occupation to economy of genocide (UNHRC, 30 June 2025) A/HRC/59/23 (the ‘Francesca Albanese 2025 Report’). https://docs.un.org/en/A/HRC/59/23

[20] Michael Biesecker, Sam Mednick and Garance Burke, ‘As Israel uses US-made AI models in war, concerns arise about tech’s role in who lives and who dies’ (*AP*, 18 February 2025). https://apnews.com/article/israel-palestinians-ai-technology-737bc17af7b03e98c29cec4e15d0f108

[21] Harry Davies and Yuval Abraham, “‘A million calls an hour’: Israel relying on Microsoft cloud for expansive surveillance of Palestinians”, *The Guardian* (6 August 2025), https://www.theguardian.com/world/2025/aug/06/microsoft-israeli-military-palestinian-phone-calls-cloud; Harry Davies and Yuval Abraham, “Microsoft blocks Israel’s use of its technology in mass surveillance of Palestinians”, *The Guardian* (25 September 2025),

Ekō has seen no sign that the company has applied the same scrutiny to Al Munasseq, an application that could be processing the personal data of hundreds of thousands of Palestinians on Microsoft's servers.

The Irish Council for Civil Liberties (ICCL), in partnership with Ekō, filed a complaint with Ireland's Data Protection Commission (DPC) on 4 December 2025 on the basis of whistleblower evidence. The GDPR complaint was sent to the DPC indicating that Microsoft hosts components of Al Munasseq in Irish data centres. It also indicates that, following the August 2025 revelations of Israel's spy unit's, Unit 8200, mass surveillance of Palestinians on Azure, Microsoft facilitated the rapid removal of the surveillance from its European data centers. Microsoft's processing in the EU falls under GDPR and the DPC's supervision. Nearly nine months after the complaint was submitted, the DPC responded with only basic questions, giving no indication that it is treating a matter of life and death with the urgency its obligations require.

This report documents how a single application has become a channel through which Israel restricts Palestinians' movement and, through it, their access to other fundamental rights, all while collecting their personal data. It also documents the failure of those with the power to act. Microsoft continues to provide key infrastructure for the Application to run while millions of Palestinians bear the consequences of Israel's system of apartheid. Regulators have yet to move with the urgency required, allowing credible whistleblower evidence to go uninvestigated. Governments have yet to act on their obligations. Every day this continues, Israel's unlawful occupation is further entrenched, and the cost is borne by Palestinians. This report is intended to inform the public and to equip those with responsibility to act. They must do so now.

What must happen

- **Microsoft** must stop hosting Al Munasseq, end the provision of its services to the Israeli military and Ministry of Defence, and act on its shareholders' demands for stronger due diligence as called for in Proposal 5 on Human Rights Due Diligence and Proposal 6 on reporting on the siting of data infrastructure in human rights hotspots.[22]
- **Ireland's Data Protection Commission** must investigate, as a matter of urgency, the processing of Palestinians' personal data through Al Munasseq in Microsoft's Irish data centres, and use its powers to stop unlawful processing.[23]
- **Governments and lawmakers** must investigate the role of technology companies in sustaining Israel's permit and surveillance regime, call Microsoft's executives to testify in public, and meet their obligation not to render aid or assistance in maintaining the situation created by Israel's unlawful presence in the Occupied Palestinian Territory.

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https://www.theguardian.com/world/2025/sep/25/microsoft-blocks-israels-use-of-its-technology-in-mass-surveillance-of-palestinians.

[22] Microsoft Proxy Statement 2026 https://www.sec.gov/ix?doc=/Archives/edgar/data/0000789019/000119312526427849/d61756ddef14a.htm#toc61756_41

[23] Irish Council for Civil Liberties, Complaint Against Microsoft Ireland Operations Limited's Unlawful Processing in Support of Unlawful Israeli Activities (3 December 2025), https://www.iccl.ie/wp-content/uploads/2025/12/REDACTED-ICCL-GDPR-DPC-complaint-Microsoft.pdf

— **Prosecutors** should examine, within their jurisdictions, whether companies providing the infrastructure for this system may be complicit in crimes under international law, including the crimes against humanity of apartheid and persecution.

Full recommendations are set out at the end of this report.

Ekō's research for this report relied primarily on open-source evidence, technical analysis conducted by technology experts, and on witness statements from individuals in the OPT.

Background

It is inherent in Israel's occupation and settlement enterprise that Israel is violating the prohibition of apartheid, a norm of international law — and agents of the Israeli State and military are committing the crime of apartheid under article 7(1)(j) of the Rome Statute. That view is widely held among judges of the ICJ, UN experts and international, Israeli and Palestinian human rights organisations.

As the ICJ has affirmed, "from a legal standpoint, the Occupied Palestinian Territory constitutes a single territorial unit, the unity, contiguity and integrity of which are to be preserved and respected".[24] This report nonetheless describes the restrictions imposed on Palestinians in the West Bank, East Jerusalem and Gaza separately. It does so because Israel administers each area under a different regime, and documenting that fragmentation requires describing it. This is not a recognition of those divisions, which are themselves a product of Israel's unlawful occupation and system of apartheid.

A central component of that apartheid regime is that Palestinians are subject to stringent and degrading restrictions of movement, both within the West Bank (including East Jerusalem) and between the West Bank and Gaza. Those restrictions are discriminatory (they apply to Palestinians in the OPT, but not to Jewish Israelis); they fragment and segregate the Palestinian people, sever family ties, limit Palestinians access to healthcare, and impair Palestinians' access to and use of land within the OPT; and, they are a critical means of establishing and maintaining Israel's occupation and settlement enterprise.

Corresponding to the restrictions on Palestinian movement is a permit system, in which: (i) Palestinians must obtain permission to move between different restricted areas of the OPT, and (ii) Israel controls and administers Palestinians' freedoms to do so.

The Al Munasseq Application digitises significant parts of Israel's permit system for the OPT; Palestinians are required or in practice have no alternative but to use the Application to apply for a variety of permits and ID cards. As Israel's principal permit management application for

[24] *Palestine Advisory Opinion*, para. 78.

Palestinians in the OPT, Al Munasseq forms a critical part of the technological infrastructure which enables, facilitates and/or furthers the implementation of the restrictions on Palestinians' movement[25] and the physical separation of Palestinians and Jewish Israeli settlers.

The Application is hosted on Microsoft Azure. Microsoft provides the underlying and essential computer infrastructure that enables the Application to function.

One people, fragmented by design

The Palestinian people, at present, consist of an estimated 15,489,639 persons,[26] fragmented among different locations, and all subject to different administrative regimes in relation to their entry and residency to any part of former mandatory Palestine.

Palestinians exiled, including Palestine Refugees, and Palestinians abroad: over **8,077,183** Palestinians are currently residents in Arab countries or other foreign countries outside of the former mandatory Palestine.[27] They include at least 3,392,699 registered Palestine refugees,[28] exiled from their homeland since the Nakba in 1948 when over 750,000 Palestinians were expelled or forced to flee during the establishment of the State of Israel; as well as Palestinians expelled or forced to flee at the start of Israel's occupation in 1967. For all but a meagre handful of Palestinians, the professed remedies to their forced displacement and forced exile remain utterly unavailable. While Palestinians have an international right of return, reaffirmed by the United Nations General Assembly (UNGA), the United Nations Security Council (UNSC), and by the Committee on the Elimination of Racial Discrimination (CERD),[29] "the right of many

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[25] Society of St. Yves, Life Restricted, p. 10. https://saintyves.org/en/2019/09/11/life-restricted-freedom-of-movement-and-access-restrictions-in-the-occupied-palestinian-territory/

[26] State of Palestine, Palestinian Central Bureau of Statistics (PCBS), *Palestine in Figures, 2025* (March 2026), https://www.pcbs.gov.ps/media/1sod5hia/book2736.pdf.

[27] State of Palestine, PCBS, *Palestine in Figures, 2025* (March 2026), https://www.pcbs.gov.ps/media/1sod5hia/book2736.pdf.

[28] UNRWA, *Annual Operational Report 2021,* https://www.unrwa.org/sites/default/files/content/resources/2021_aor_eng_-_sept_20-2022_1.pdf, Annex 5: 2021 statistics bulletin.

[29] CERD, *Concluding Observations of the Committee on the Elimination of Racial Discrimination: Israel*, CERD/C/304/Add.45 (30 March 1998), https://www.undocs.org/CERD/C/304/Add.45, para. 18; UNGA, CERD, *Report of the Committee on the Elimination of Racial Discrimination, 70th session (19 Feb.-9 Mar. 2007) 71st session (30 July-17 Aug. 2007), United Nations General Assembly, Official Records, 62nd session, Supp. No. 18*, A/62/18, https://www.undocs.org/A/62/18, para. 211; United Nations General Assembly (UNGA), *Resolution 194 (III)*, A/RES/194(III) (11 December 1948), https://www.undocs.org/A/RES/194(III) para. 11; UNGA, *Resolution 2452 (XXIII)*, A/RES/2452(XXIII) (19 December 1969), https://www.undocs.org/A/RES/2452(XXIII), para. 1; UNGA, *Resolution 3236 (XXIX)*, A/RES/3236(XXIX) (22 November 1974), https://www.undocs.org/A/RES/3236(XXIX); United Nations Security Council (UNSC), *Resolution 608*, S/RES/608(1988) (14 January 1988), https://www.undocs.org/S/RES/608(1988), para. 1; UN OHCHR, *Right of return of Palestinian refugees must be prioritised over political considerations: UN experts* (21 June 2023), https://www.ohchr.org/en/statements-and-speeches/2023/06/right-return-palestinian-refugees-must-be-prioritised-over.

Palestinians to return and possess their homes in Israel is currently denied"[30] through a combination of rules and policies by Israel — both written and unwritten — with respect to *inter alia* their entry and residency in any area under Israel's administrative control.

Palestinians in Israel: over **1,855,360** Palestinians currently hold Israeli citizenship and reside in Israel. They are subject to its domestic legislation and policies, including with respect to citizenship, family unification, property-ownership, limitations on the freedom of speech and association, *etc.* — many of which have been deemed discriminatory by the Independent International Commission of Inquiry on the Occupied Palestinian Territory,[31] as well as by CERD, and its ad hoc conciliation commission on the inter-State communication submitted by the State of Palestine against Israel.[32]

Palestinians in the OPT: **5,557,096** Palestinians (not including Palestinians in East Jerusalem) are subject to Israel's continued unlawful occupation in the West Bank and in the Gaza Strip, where Israel continues its administration of the population registry.[33] An estimated 3,430,062 of those are in the West Bank, while the population in Gaza has declined from 2.2 million by the end of 2023 to 2,127,034 — "a decrease of 10.6% of the population estimates for Gaza Strip for the 2025", and where "[a] fundamental shift is expected in the age and population pyramid of Gaza Strip population due to the deliberate targeting of younger age groups by the Israeli army, particularly children and youth ... The impact is not limited to the present, but is expected to extend into the medium and long term. The loss of a significant portion of men and women of reproductive age is likely to lead to a future decline in birth rates. This will contribute to a growing demographic gap. It will affect the demographics for years to come".[34]

Palestinians in the OPT, specifically in East Jerusalem (West Bank): around 327,700 Palestinians currently live in East Jerusalem, in the West Bank, holding permanent residency status.[35] East Jerusalem is not only occupied but has also been unlawfully annexed by Israel,

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[30] CERD, *Concluding Observations of the Committee on the Elimination of Racial Discrimination: Israel*, CERD/C/304/Add.45 (30 March 1998), https://www.undocs.org/CERD/C/304/Add.45, para. 18; UNGA, CERD, *Report of the Committee on the Elimination of Racial Discrimination, 70th session (19 Feb.-9 Mar. 2007) 71st session (30 July-17 Aug. 2007), United Nations General Assembly, Official Records, 62nd session, Supp. No. 18*, A/62/18, https://www.undocs.org/A/62/18, para. 211.

[31] UNGA, *Report of the Independent International Commission of Inquiry on the Occupied Palestinian Territory, including East Jerusalem, and Israel*, A/77/328 (14 September 2022), https://www.undocs.org/A/77/328, paras. 21-23.

[32] See *e.g.* CERD, *Concluding observations on the combined seventeenth to nineteenth reports of Israel*, CERD/C/ISR/CO/17-19 (27 January 2020), https://docs.un.org/en/CERD/C/ISR/CO/17-19, paras. 15-16, 21-23 and CERD, *Findings and recommendations: Report of the ad hoc conciliation commission on the inter-State communication submitted by the State of Palestine against Israel under article 11 of the International Convention on the Elimination of All Forms of Racial Discrimination* (21 August 2024), https://digitallibrary.un.org/record/4059557, para. 44.

[33] Proclamation regarding the Implementation of the Interim Agreement (Judea and Samaria [*sic.*]) Number 7, 1995 [Hebrew], unofficial translation available via: https://www.hamoked.org/files/2017/1133_eng.pdf; *Palestine Advisory Opinion,* paras. 88-94, 261-262, 264-268, 285.

[34] State of Palestine, PCBS, *Palestinians at the End of* 2025, https://www.pcbs.gov.ps/media/enflushk/book2734.pdf, p 26.

[35] State of Palestine, PCBS, *Jerusalem Statistical Yearbook* (2025), https://www.pcbs.gov.ps/media/rlulmvop/book2726.pdf [Arabic], p. 30. Based on the population figure for "J1", as Palestinians in "J2" would most likely have West Bank IDs.

which applies its domestic legislation there in full.[36] They are subject to the full application of Israel's domestic legislation by virtue of Israel's unlawful annexation of Jerusalem.

Registration of Palestinians in the Palestinian population registry common to the West Bank and the Gaza Strip is done on the basis of the address of the parents (West Bank or Gaza Strip). That address cannot be changed unilaterally by the Palestinian authorities. Israeli authorities must approve each change of address.[37]

The address is subsequently listed on the Israeli-approved ID card, and determines where its holder may reside, and what specific movement restrictions and permit regime they are subjected to. Israeli authorities moreover require possession of such ID-cards for entry to Israel and for entry to the West Bank, which means they require it for all movement between the Gaza Strip and the West Bank (which requires transit through Israel), and for all movement between the West Bank and East Jerusalem, by virtue of the unlawful annexation of the latter.[38] *In sum*: "Israel's population registry is the basis for a regime of travel restrictions that limit a person's ability to travel far from his or her registered address – regardless of where he or she actually lives", and that is generally prohibitive of free movement.[39]

Movement restrictions and the permit system

Palestinians are subject to stringent restrictions of movement across the OPT. Restrictions on Palestinian movement can be categorised as follows:

- Restrictions of movement within the West Bank (excluding East Jerusalem);
- Restrictions of movement in respect of East Jerusalem; and
- Restrictions of movement between the West Bank and Gaza.

In each context, Israel's restrictions of Palestinian movement are a critical means of furthering its continued unlawful occupation and control over the OPT.

Restrictions on Palestinian movement are facilitated and maintained, in significant part, by a permit system, the "administrative arm" of the restrictions on Palestinians' movement.[40] The permit system refers to a regime of physical or electronic documents issued by Israeli authorities recording the duration and purpose for which a Palestinian person has permission to be in a

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[36] Palestine Advisory Opinion, para. 179; UN Security Council, Resolution 478 (1980), S/RES/478(1980) (20 August 1980), https://www.undocs.org/S/RES/478(1980).

[37] Including since the Interim Agreements, see *e.g.* Israel, The Civil Administration of Judea and Samaria, Office of the Chief Administrator, To: "The Center for the Protection of the Individual", *Subject: Notices of change of address, your inquiry dated 2 March 2008* (15 April 2008), https://hamoked.org.il/items/110360.pdf [Hebrew]. See also HaMoked, *State failure to correct an address entry in the Israeli copy of the Palestinian population registry: the case of the couple Z* (13 March 2008), https://hamoked.org/cases.php?cID=Cases42.

[38] Interim Agreement on the West Bank and the Gaza Strip Washington, D.C., September 28, 1995, Annex III, Protocol Concerning Civil Affairs, Article 28 – Population Registry and Documentation (5-7) https://hamoked.org/files/2011/113300_eng.pdf

[39] Gisha, *Briefing Paper: Disengagement Danger — Israeli Attempts to Separate Gaza from the West Bank* (February 2006), https://www.gisha.org/UserFiles/File/publications_english/Disengagement_Danger_6feb_06.pdf, p. 3.

[40] St Yves, Life Restricted, p. 10.

particular area. The permit system is administered by COGAT, the body "charged with implementing the civilian policy and security coordination of the Government of Israel" in the West Bank and "towards the Gaza Strip", which reports to Israel's Ministry of Defense (IMOD).[41] There are over 100 types of permits which may be issued based on considerations like the reason for the movement, the person's places of origin and destination, and the status of the applicant.[42]

The permit system is based upon and closely related to Israel's population registry for Palestinians and the limited and conditional residency status Palestinians are granted in the OPT.

The measures taken to restrict Palestinian movement impede access to basic resources and services, disrupt family and social life, undermine livelihoods, and contribute to the fragmentation of the West Bank and the OPT.[43] Amnesty International describes the suite of restrictions as "a tool through which Israel separates and isolates Palestinians from each other and the rest of the world".[44] Critically, the permit system has no application to Jewish settlers, Israeli citizens or foreign nationals.[45]

Movement within the West Bank

Pursuant to its tight control of the West Bank, Israel has enforced stringent restrictions of movement on the Palestinian population. Significant parts of the West Bank are off-limits to Palestinians, or require permits to be accessed, and then when accessed, that access is precarious (permits can be revoked for no reason). The same areas are freely accessible to Jewish Israeli settlers.[46]

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[41] Israel, Coordination of Government Activities in the Territories, *About Coordination of Government Activities in the Territories* (25 May 2020), https://www.gov.il/en/pages/aboutcogat.

[42] Israel, Coordination of Government Activities in the Territories, Operations Department, *Status of Authorizations for entry of Palestinians into Israel, for their passage from Judea and Samaria into the Gaza Strip; and for their departure abroad (29 May 2023),* 14 August 2023, https://www.gov.il/he/pages/status-of-permissions [Hebrew].

[43] https://www.ochaopt.org/content/movement-and-access-west-bank-april-2026

[44] Amnesty International, ***Israel's apartheid against Palestinians: Cruel system of domination and crime against humanity,*** p. 95.

[45] Amnesty International, Israel and Occupied Palestinian Territories: Automated Apartheid: How facial recognition fragments, segregates and controls Palestinians in the OPT (2 May 2023), MDE 15/6701/2023, https://www.amnesty.org/en/documents/mde15/6701/2023/en/; No Azure for Apartheid (No Tech for Apartheid), "A Marriage Made in Hell: An Introduction to Microsoft's Complicity in Apartheid and Genocide", Medium (21 May 2024), https://medium.com/@notechforapartheid/a-marriage-made-in-hell-an-introduction-to-microsofts-complicity-in-apartheid-and-genocide-d7dfad65a196.

[46] Report of the Special Rapporteur on the situation of human rights in the Palestinian territories occupied since 1967 (23 October 2017) A/72/556 (the 'Michael Lynk 2017 Report'), at §§ 53-55; Michael Lynk 2022 Report, at § 42; ICJ Advisory Opinion, § 199.

The West Bank is divided into 165 disconnected enclaves.[47] Israel has put in place 849 impediments to the movement of Palestinians in the West Bank, through the creation of disconnected enclaves intersected with walls, checkpoints, barricades, military closure zones and "*Israeli-only*" roads.[48] As a UN Independent International Fact-Finding Mission noted as far back as 2013:

> The restrictions themselves come in many forms, including settler-only roads, a regime of checkpoints and crossings (closure obstacles), impediments created by the wall and its gate and permit regime, as well as administrative restrictions.[49]

Checkpoints and roadblocks.
Israel has constructed a series of checkpoints throughout the West Bank. UN OCHA reported that there were 565 movement obstacles in the West Bank in early 2023, including 49 constantly staffed checkpoints and more than 300 roadblocks.[50] Movement through checkpoints involves rigorous security checks, including bag searches and vehicle inspections. Since 7 October 2023, restrictions on movement have increased. Israeli authorities have closed entrances to most Palestinian towns and villages, most checkpoints connecting the West Bank to East Jerusalem, and have now established new checkpoints across the West Bank.[51]

UN OCHA observes that since October 2023:

> the Israeli authorities have imposed additional restrictions on the movement of 3.3 million Palestinians across the West Bank, including East Jerusalem, in the form of physical obstacles or restricted access regulations. A rapid survey conducted by OCHA in March 2024 found that 86 new movement obstacles were set up in the West Bank since October 2023. In addition, there were changes documented in relation to the status of about 100 pre-existing obstacles that entailed tighter restrictions, such as the closure of road gates that were previously usually open or through limiting opening hours of some checkpoints. Coupled with the 712-kilometre-long Barrier, which remains the single largest obstacle in the West Bank, movement obstacles control, restrict and disrupt the freedom of movement of Palestinians either permanently or intermittently, further entrenching territorial and social fragmentation, undermining livelihoods,

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[47] B'Tselem, Reality Check: Almost Fifty Years of Occupation (5 June 2016), https://www.btselem.org/publications/201606_reality_check.

[48] UN OCHA, Fact Sheet: Movement and Access in the West Bank, April 2026 (23 April 2026), https://www.unocha.org/publications/report/occupied-palestinian-territory/fact-sheet-movement-and-access-west-bank-april-2026.

[49] Report of the independent international fact-finding mission to investigate the implications of the Israeli settlements on the civil, political, economic, social and cultural rights of the Palestinian people throughout the Occupied Palestinian Territory, including East Jerusalem", UN doc. A/HRC/22/63 (7 February 2013), § 72. https://digitallibrary.un.org/record/745109?v=pdf

[50] OCHA, "Fact sheet: Movement and access in the West Bank" (August 2023) https://www.ochaopt.org/sites/default/files/Factsheet_Movement_and_Access_Aug2023.pdf

[51] UN OCHA, Fact Sheet: Movement and Access in the West Bank, April 2026 (23 April 2026), https://www.unocha.org/publications/report/occupied-palestinian-territory/fact-sheet-movement-and-access-west-bank-april-2026.

hindering access to basic services, and contributing to worsening humanitarian conditions.[52]

Settlements and military zones.
Stringent restrictions of movement are placed on Palestinians in areas containing settlements or otherwise designated as military zones. All municipal areas of Israeli settlements are designated to be "closed military zones."[53] As the ICJ has found: “While these areas are accessible to all settlers and holders of an entry permit to Israel, including non-Israeli Jews, Palestinians in the Occupied Palestinian Territory require a special permit to access them.”[54]

Exclusion zones also extend to include "Special Security Areas" surrounding settlements, including significant swathes of Palestinian-owned land.[55] To access such areas, Palestinian landowners are required to prove their ownership of the land and obtain permits.[56] When unable to do so, their land may ultimately be expropriated.[31]

In total, UN OCHA estimates that “10 per cent of the West Bank lying within the municipal boundaries of Israeli settlements” is prohibited to Palestinians by military order, and “20 per cent of the West Bank is prohibited by Israeli military order on the grounds that the area is designated as a ‘firing zone’ for military training, or as a border buffer zone.”[57]

Israeli roads.
Beyond these exclusion zones, Israel has established an extensive road network in the West Bank that connects Israeli settlements to one another and with the territory of Israel, further restricting Palestinian movement.[58] UN OCHA has estimated that there are approximately 1,661 kilometres of such roads penetrating the West Bank territory,[59] often with construction-free buffer zones of 50–75 metres on each side, and it has been calculated that for every 100 kilometres of road, approximately 2,500 acres of Palestinian land is consumed.[60] As the ICJ has found, “[a]lthough this road network stretches across Area C and often passes near Palestinian

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[52] UN OCHA, *Fact Sheet: Movement and Access in the West Bank, September 2024*, https://www.unocha.org/publications/report/occupied-palestinian-territory/fact-sheet-movement-and-access-west-bank-september-2024-0.

[53] Order Concerning Security Provisions (Judea and Samaria) (No. 378), 5730-1970; Proclamation Concerning the Closure of a Territory (Israeli Settlements)(Judea and Samaria), 5757-1997, as cited in St. Yves Report, p. 19.

[54] *Palestine Advisory Opinion*, para. 199. See also: St Yves, p 19

[55] ACRI, *One Rule, Two Legal Systems*, p. 109, as cited in St. Yves Report, p. 19.

[56] St Yves, p 19

[57] UN OCHA, *Fact Sheet: Movement and Access in the West Bank, September 2024* (25 September 2024), https://www.unocha.org/publications/report/occupied-palestinian-territory/fact-sheet-movement-and-access-west-bank-august-2024; UN OCHA, Fact Sheet: Movement and Access in the West Bank (August 2023), https://www.ochaopt.org/sites/default/files/Factsheet_Movement_and_Access_Aug2023.pdf.

[58] ICJ Advisory Opinion, § 200.

[59] OCHA, *The Humanitarian Impact on Palestinians of Israeli Settlements and Other Infrastructure in the West Bank* (July 2007), as cited in St. Yves Report, p. 15.

[60] Ma'an Development Center, *Apartheid Roads: Promoting Settlements, Punishing Palestinians* (December 2008), p. 3, as cited in St. Yves Report, p. 15.

villages, access by Palestinians to much of it is impeded, restricted or entirely prohibited".[61] The ICJ further observed: "[w]here Palestinians are allowed access to the restricted road network, this access is dependent on obtaining an individual travel permit, which is not required for settlers", and those procedures for obtaining a permit are not always translated into Arabic.[62]

Closure of villages.
Palestinian villages in the West Bank are regularly closed off as a means of collective punishment or to enable Israeli military raids of villages and areas. For example, on 1 February 2026, the Israeli military promulgated a military order, "Restriction of Movement and Traffic", which designated Tulkarm, Nur Shams and Jenin refugee camps and areas within the surrounding neighbourhoods as "closure areas", such that entry and exit are prohibited without a permit.[63]

The Wall and Seam Zones.
Further restrictions result from the ongoing construction of "**the Wall**" largely in the West Bank and East Jerusalem, which has been under construction since 2002 and is now 712 km long. In *Legal Consequences of the Construction of a Wall in the Occupied Palestinian Territory (the "**Wall Advisory Opinion**"),* the ICJ found that the construction of the Wall violated international law in 2004.[64] The ICJ observed:

> It should be noted that the construction of the wall has been accompanied by the creation of a new administrative régime. Thus in October 2003 the Israeli Defence Forces issued Orders establishing the part of the West Bank lying between the Green Line and the wall as a "Closed Area". Residents of this area may no longer remain in it, nor may non-residents enter it, unless holding a permit or identity card issued by the Israeli authorities. According to the report of the Secretary-General, most residents have received permits for a limited period. Israeli citizens, Israeli permanent residents and those eligible to immigrate to Israel in accordance with the Law of Return may remain in, or move freely to, from and within the Closed Area without a permit. Access to and exit from the Closed Area can only be made through access gates, which are opened infrequently and for short periods.[65]

In 2024, the ICJ reiterated in the *OPT Advisory Opinion*: "[a] significant restriction of movement for Palestinians is the wall that has been under construction in the West Bank since 2002 […] The movement of Palestinians in areas located between completed parts of the wall and the

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[61] ICJ Advisory Opinion, § 200.
[62] ICJ Advisory Opinion, § 200.
[63] UN OCHA, *Humanitarian Situation Update #356 | West Bank* (5 February 2026), https://www.ochaopt.org/content/humanitarian-situation-update-356-west-bank.
[64] *Legal Consequences of the Construction of a Wall in the Occupied Palestinian Territory, Advisory Opinion* [2004] ICJ Rep 136, at § 163. https://www.icj-cij.org/sites/default/files/case-related/131/131-20040709-ADV-01-00-EN.pdf
[65] *The Wall Advisory Opinion*, para. 85.

Green Line depends on permits or special arrangements granted by Israel".[66] Today, the Wall restricts access to around 10% of the West Bank.[67] Palestinian residents in the West Bank who seek to go to areas in the West Bank located between completed parts of the Wall and the Green Line (i.e. the "Seam Zone", discussed below) are required to have a biometric smart card, special arrangements or permits granted by Israel.[68]

Further, stringent movement restrictions are placed on Palestinians who live in the Seam Zone. As UN OCHA has observed:

> [The Wall] blocks Palestinians living in the 'Seam Zone' from accessing their places of work and essential services in the rest of the West Bank. To continue living in their own homes and to maintain family and social relations with the rest of the West Bank they must obtain permits or 'prior coordination', and pass through Barrier checkpoints.[69]

As of 2022, around 11,000 Palestinians lived in the Seam Zone.[70] The area between the Wall and the Green Line also contains significant agricultural lands.[71] Physical access to the Seam Zone is controlled through a network of 85 gates in the Wall, of which only nine are open on a daily basis.[72] Residents and farmers are usually limited to a single designated gate, and opening hours at these gates are frequently confined to certain times of day or to particular seasons.[73] Access of services for these communities, including ambulances and fire brigades, is limited.[74]

The permit system for the Seam Zone is oppressive. Applicants must demonstrate a qualifying connection to the land.[75] Decisions are made without any hearing, and there is no right of

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[66] *Palestine Advisory Opinion*, para. 201, citing: *The Wall Advisory Opinion*, p. 168, para. 80 https://www.icj-cij.org/sites/default/files/case-related/131/131-20040709-ADV-01-00-EN.pdf; and UNGA, *Israeli practices affecting the human rights of the Palestinian people in the Occupied Palestinian Territory, including East Jerusalem: Report of the Secretary-General*, A/68/502 https://docs.un.org/en/A/68/502 (4 October 2013), paras. 22-23.

[67] B'Tselem, *The Separation Barrier* (November 2017), https://www.btselem.org/separation_barrier

[68] See Israel, *Procedure for Issuing a Biometric Card*, available via https://www.gisha.org/UserFiles/File/LegalDocuments/procedures/movement_between_israel_and_the_west_bank/09.pdf [Hebrew]. See also: *OPT Advisory Opinion*, § 201.

[69] UN OCHA, *Fact Sheet: The Humanitarian Impact of 20 Years of the Barrier* (December 2022), https://www.un.org/unispal/wp-content/uploads/2023/01/OCHAFACTSHEET_301222.pdf.

[70] UN OCHA, *Fact Sheet: The Humanitarian Impact of 20 Years of the Barrier* (December 2022), https://www.un.org/unispal/wp-content/uploads/2023/01/OCHAFACTSHEET_301222.pdf.

[71] UN OCHA, *Fact Sheet: Movement and Access in the West Bank* (September 2024), https://www.ochaopt.org/sites/default/files/Factsheet-WB-September-2024.pdf;

[72] OCHA, *Special Focus: The Barrier Gate and Permit Regime Four Years on: Humanitarian Impact in the Northern West Bank* (November 2007), p. 2, as cited in St. Yves Report, p. 18.

[73] St. Yves Report, pp. 18–19.

[74] UN OCHA, *Fact Sheet: The Humanitarian Impact of 20 Years of the Barrier* (December 2022), https://www.un.org/unispal/wp-content/uploads/2023/01/OCHAFACTSHEET_301222.pdf.

[75] Regulations Concerning Entry Permits to the Seam Zone and Staying Therein, 5764-2003, Annex A, as cited in St. Yves Report, p. 18.

appeal, raising serious due process concerns.[76] Renewal applications, which must be made periodically, often take months to process, during which time applicants may be unable to access their land or homes, and the process is plagued by a lack of transparency.[77] The grant of permits for the Seam Zone is in steady decline. In 2025, only 5,093 of 11,549 permit applications (44%) were approved.[78]

Restrictions on access to the Seam Zone have only intensified since October 2023. UN OCHA has explained that 150 communities who own land in the Seam Zone have been "generally barred from working their lands since October 2023, leading to significant income losses".[79] These access restrictions have "effectively nullif[ed] the right of approximately 95% of farmers, olive growers, to access their land year-round, limiting them to seasonal entry during the harvest alone".[80]

East Jerusalem

Israel's military and border police treat entry by Palestinians to Jerusalem as entry into Israel. Despite being part of the OPT, Palestinians cannot freely move between East Jerusalem and the rest of the West Bank, unless they are Jerusalem residents or Palestinians holding Israeli citizenship. Palestinians must apply for permits for all entry to and residency in East Jerusalem, whereas Jewish Israelis can move freely between East Jerusalem and the rest of the West Bank and settle in any Israeli settlements therein.

Israel has developed a system of entry and residency to the occupied territory of East Jerusalem premised on the differential treatment of the following groups:

1. Israeli nationals and Jewish foreign nationals or foreign nationals of Jewish descent or with Jewish first-degree family members are eligible for entry into Israel under the Law of Return by virtue of their Jewishness, Jewish descent, or Jewish family relations. Their residence and entry to East Jerusalem is unrestricted.[81]

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[76] The Association for Civil Rights in Israel, *One Rule, Two Legal Systems: Israel's Regime of Laws in the West Bank* (October 2014), p. 110, as cited in St. Yves Report, p. 18.

[77] St Yves, p. 18

[78] HaMoked, From Temporary Measures to Permanent Policy: How the Expansion and Deepening of the "Seam Zone" Regime Are Reshaping Control Over West Bank Lands (July 2026), p. 2, https://hamoked.org/files/2026/1667180_eng.pdf.

[79] UN OCHA, *Fact Sheet: Movement and Access in the West Bank* (September 2024), https://www.ochaopt.org/sites/default/files/Factsheet-WB-September-2024.pdf.

[80] HaMoked, *From emergency measures to permanent policy: The military formalizes draconian war-time limitations on "Seam Zone" farmers* (6 January 2026), https://hamoked.org/document.php?dID=Updates2520.

[81] Israel, The Law of Return 5710 (1950) [Hebrew], and The Law of Return (Amendment No.2) 5730-1970 [Hebrew], unofficial English translation via: https://www.adalah.org/uploads/oldfiles/Public/files/Discriminatory-Laws-Database/English/36-Law-of-Return-1950.pdf; *OPT Advisory Opinion*, at § 193.

2. Foreign nationals (save for a range of neighbouring States with significant populations of Palestinians)
3. Palestinian Jerusalemites. As observed by the ICJ: "because Israel treats East Jerusalem as its own territory, it regards [Palestinian Jerusalemites] … as foreigners, and it requires that they hold a valid residence permit".[82] Israel registers Jerusalemite Palestinians in the Israeli population registry as "permanent residents" — provides them with ID-cards — and retains its ability to remove them from its population registry.[83] Palestinians — often having lived in the city for generations — can lose their permanent residency status should their "centre of life" be moved elsewhere, or should they acquire status in a third country.[84] Further, Palestinian residence permits can be revoked on a series of grounds, including "breach of loyalty" to Israel[85] and because a family member commits "an act of terrorism or is a terrorist operative", defined as including minor crimes.[86]
4. Palestinians from the West Bank are prevented from obtaining residency in Jerusalem, except by way of exception. Under the Citizenship and Entry into Israel Law (passed in 2003 and renewed annually since), Israel:

> shall not grant the inhabitant of an area [the West Bank – excluding East Jerusalem here – and the Gaza Strip] citizenship on the basis of the Citizenship law, and shall not give him a license to reside in Israel on the basis of the Entry into Israel Law, and

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[82] *Palestine Advisory Opinion*, para. 165.

[83] *Mubarak 'Awad v. Yitzhak Shamir, Prime Minister and Minister of Interior and the Police Minister*, HCJ 282/88, 5 June 1988 [Justice Aharon Barak] [Hebrew], unofficial English translation available at https://hamoked.org/files/2010/1430_eng.pdf, , pp. 4-5, para. 9

[84] *Mubarak 'Awad v. Yitzhak Shamir, Prime Minister and Minister of Interior and the Police Minister*, HCJ 282/88, 5 June 1988 [Justice Aharon Barak], [Hebrew], unofficial English translation available at https://hamoked.org/files/2010/1430_eng.pdf, pp. 6-7, para. 14. See also: HaMoked, *Revocation of permanent residency in 2024: 60 East Jerusalem Palestinians were stripped of their permanent residency status as part of Israel's "quiet deportation" policy* (2 September 2025), https://www.hamoked.org/document.php?dID=Updates2512.

[85] *Palestine Advisory Opinion*, para. 193. See also CERD, *Concluding observations on the combined seventeenth to nineteenth reports of Israel*, CERD/C/ISR/CO/17-19 (27 January 2020), https://docs.un.org/en/CERD/C/ISR/CO/17-19, paras. 15-16.

[86] Israel, Prohibition on Unlawful Stay and Residence in Israel Law (Legislative Amendments), 5785-2025 [Hebrew], unofficial English translation available at: https://hamoked.org/files/2025/1666851_eng.pdf; HaMoked, *Joint High Court petition: Revoke the new amendment to the Citizenship and Entry into Israel Law entrenching collective punishment* (18 August 2025), https://hamoked.org/document.php?dID=Updates2513; HaMoked, *Instead of the ameliorations recommended by the HCJ, the Knesset amends the Citizenship and Entry into Israel Law to further restrict Palestinian family unification as a collective punishment* (10 July 2025), https://www.hamoked.org/document.php?dID=Updates2510; HaMoked, *For the first time, the Appeals Tribunal approved revocation "for deterrence purposes" of status and stay permits issued to Palestinians living with their families in East Jerusalem for years: Seven have already been ordered to leave the country* (21 September 2022), https://www.hamoked.org/document.php?dID=Updates2328.

the Area Commander shall not grant a said inhabitant, a permit to stay in Israel, on the basis with the security legislation in the area[87]

While exceptions exist in the law, those are subject to the discretion of the Ministry of Interior. The result is that Palestinians from the West Bank can only obtain short-term permits allowing them only temporary entry to and presence in East Jerusalem, for a limited set of reasons.[88] Even when permits are obtained, the manner in which the movement restrictions are imposed introduces "serious administrative hurdles" for the Palestinian population.[89]

5. Palestinians from Gaza: As per Israeli Government Resolution No. 3598 of 15 June 2008, none of the exceptions to entry and residency under the Citizenship and Entry into Israel Law apply to persons registered in the Gaza population registry.[90] Such persons can only enter East Jerusalem based on temporary permits for a defined set of reasons.

The consequences of those restrictions on Palestinian entry to and residency within East Jerusalem are severe. Amongst other matters, the majority of specialist medical facilities serving the Palestinian population are located in East Jerusalem, meaning that restrictions on access translate directly into restrictions on access to essential healthcare. Between 2011 and 2021, 331,678 West Bank medical permit applications were denied — averaging 30,153 permit denials each year.[91] Even where medical permits are granted, the restrictions on movement and checkpoints Palestinians have to pass impede or delay their access to healthcare. For example, a Palestinian woman that Ekō interviewed as part of this research recounts her experience of having to travel from Nablus to East Jerusalem at 6am each day for 10-minute radiotherapy treatment sessions, only to return in the evening.

The restrictions also sever family ties. Palestinians in East Jerusalem often maintain family relations with Palestinians from the rest of the OPT, and are disproportionately affected by the restrictions on the entry and residency of those Palestinians to Jerusalem.[92]

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[87] Israel, The Citizenship and Entry into Israel Law (temporary provision) 5763 – 2003 [Hebrew], unofficial English translation at: https://www.adalah.org/uploads/oldfiles/Public/files/Discriminatory-Laws-Database/English/41-Citizenship-and-Entry-into-Israel-Law-Temporary-Order-2003.pdf.

[88] See *infra* para. under point 5.

[89] St. Yves Report, p. 6.

[90] Citizenship and Entry into Israel Law (Temporary Order) 5762-2003 – Validity Extension, Resolution No. 3598 of the government dated 15 June 2008 [Hebrew], unofficial English translation at: https://hamoked.org/items/8881_eng.pdf; *Hadri, Kahouji, Abu 'Adrah et al.* v. Prime Minister, Minister of Interior and Attorney General, HCJ 4047/13, 14 June 2015, Judgment of the Supreme Court sitting as the High Court of Justice [Hebrew], unofficial English translation available at: https://hamoked.org/files/2015/8886_eng.pdf.

[91] WHO, *Right to Health Barriers to health and attacks on health care in the occupied Palestinian territory, 2019 to 2021* (2023), https://applications.emro.who.int/docs/9789292740887-eng.pdf, p. 49. See also: https://www.ochaopt.org/content/movement-and-access-west-bank-april-2026

[92] *OPT Advisory Opinion*, at § 195.

Movement between the West Bank and Gaza

The Occupied Palestinian Territory "constitutes a single territorial unit, the unity, contiguity and integrity of which are to be preserved and respected", as the International Court of Justice affirmed in 2024.[93]

Notwithstanding, movement between the West Bank and Gaza is subject to Israeli restrictions of movement and its permit system. Since 1991, Israel has required residents of each of Gaza and the West Bank to hold individual permits in order to travel through Israeli territory to access the other.[94] A safe-passage corridor established in 1999 under Oslo II was closed in September 2000.[95] By March 2005, movement of people between the West Bank and Gaza was "virtually impossible".[96] Movement between the West Bank and Gaza is only allowed for limited purposes (such as for medical needs), and only when permitted by Israeli authorities.[97]

Permits notionally available have become increasingly difficult to obtain.[98] Applications have been frequently refused or not decided in time for the requested travel.[99] Permits have been refused for reasons such as the applicant's family relationship to a member of Hamas;[100]

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[93] *Palestine Advisory Opinion*, para. 78.

[94] NRC, *Legal Memo: Movement between the West Bank and the Gaza Strip* (December 2016), https://www.nrc.no/globalassets/pdf/legal-opinions/legal_memo_movement_between_wb_gaza.pdf; Order Regarding Suspension of the General Exit Permit (No. 5) (Temporary Order) (Judea and Samaria), 5751–1991 [Hebrew], unofficial English translation via: https://www.hamoked.org/files/2018/8794_eng.pdf. A similar order was issued for the Gaza Strip. See also: B'Tselem and HaMoked, One Big Prison: Freedom of Movement to and from the Gaza Strip on the Eve of the Disengagement Plan, March 2005, https://www.un.org/unispal/wp-content/uploads/2005/03/c8b873b597e6484e85256fd30063f0d5_200503_Gaza_Prison_English.pdf, pp. 9–10.

[95] B'Tselem and HaMoked, One Big Prison: Freedom of Movement to and from the Gaza Strip on the Eve of the Disengagement Plan, March 2005, p. 10; Gisha, Disengagement Danger: Israeli Attempts to Separate Gaza from the West Bank, https://hamoked.org/document.php?dID=8601 February 2006, p. 2.

[96] UN OCHA, The agreement on movement and access: one year on, https://www.unocha.org/publications/report/occupied-palestinian-territory/opt-agreement-movement-and-access-one-year, November 2006.

[97] *OPT Advisory Opinion*, at § 202; Israel, Coordination of Government Activities in the Territories, Operations Department, *Status of Authorizations for entry of Palestinians into Israel, for their passage from Judea and Samaria into the Gaza Strip; and for their departure abroad (29 May 2023)*, 14 August 2023, https://www.gov.il/he/pages/status-of-permissions [Hebrew].

[98] A history of these changes is set out in: B'Tselem, Divide and Rule, May 1998, pp. 5-6. See also Gisha, Disengagement Danger, February 2006, p. 2; Gisha, Area G, June 2020, pp. 6-7.

[99] Medical Aid for Palestinians and Al Mezan Center for Human Rights, Delayed, Denied and Deprived: The collective punishment of Palestinian patients in Gaza in the context of Israel's 15-year blockade, June 2022, especially at p. 6; OCHA, Palestinian access from Gaza Strip declined sharply in 2017, 15 January 2018.

[100] Physicians for Human Rights, Dramatic Increase in Refused Permits to Travel Out of Gaza, 20 August 2018; D. Moss, M. Efrat *et al.*, Female patients from Gaza and Israel's medical exit permit policy, *The Lancet*, August 2019. See also, Breaking the Silence, Military Rule: Testimonies of soldiers from the Civil Administration, Gaza DCL and COGAT, 2011-2021, pp. 29-30.

allegations that a relative of the applicant is living "illegally" in the West Bank or Israel;[101] or submission of documentation bearing the phrase "State of Palestine".[102] Further, permits have been denied consistently since 7 October 2023; even medical evacuations from Gaza have been heavily restricted.[103]

The alternative route between Gaza and the West Bank – via the Rafah crossing in Gaza into Egypt, then through Jordan and across the Palestinian–Jordanian border into the West Bank (or vice versa) – is subject to similar restrictions of movement and permit requirements.[104] Israel controls entry at the King Hussein / Allenby Bridge on the Jordan / West Bank border,[105] and has refused entry to the West Bank to Palestinians registered as Gaza residents without a special permit.[106]

Pursuant to Israel's "separation policy", residents of Gaza are not permitted to relocate to the West Bank whereas West Bank residents may only move to Gaza under specified conditions, and if they sign a waiver forfeiting the right to return.[107]

Palestinians from Gaza present in the West Bank without a valid permit are considered infiltrators in the West Bank, and risk arrest and deportation.[108] Deportation practices from the West Bank to Gaza have intensified since October 2023: over ten thousand residents from the Gaza Strip had their medical or work permits to the West Bank or to Israel revoked, many of whom were subjected to detention, beatings, inhuman and degrading treatment, and

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[101] D. Moss, M. Efrat *et al*., Female patients from Gaza and Israel's medical exit permit policy, *The Lancet*, August 2019.

[102] J. Khoury, Israel Refuses to Review Gazans' Entry Permit Requests Labeled 'State of Palestine', *Haaretz*, 23 February 2022; Gisha, The Permit Regime: Testimonies, 28 July 2022.

[103] https://gisha.org/en/gaza-crossings-update-3/ .

[104]Gisha, Movement of people via Rafah crossing, https://gisha.org/en/graph/movement-of-people-through-rafah-crossing/?__cf_chl_tk=fSi2HgKQyXXoLywuLp6RaKQJNrHCM31CkkKPhFudvZI-1793099602-1.0.1.1-Y5_C.UA1CmT1FYDpNxSKoQC1SrNoIg0LJT76vnc3orY 3 July 2022; Breaking the Silence, Military Rule: Testimonies of soldiers from the Civil Administration, Gaza DCL and COGAT, https://www.breakingthesilence.org.il/inside/wp-content/uploads/2022/07/Military_rule_testimony_booklet.pdf 2011–2021, pp. 30–32.

[105]Gisha, Disengagement Danger, February 2006, p. 2. https://hamoked.org/document.php?dID=8601

[106]HaMoked and B'Tselem, So Near and Yet So Far: Implications of Israeli-Imposed Seclusion of Gaza Strip on Palestinians' Right to Family Life, https://hamoked.org/files/2013/1158150_eng.pdf January 2014, pp. 9, 31, 60.

[107]Gisha, unofficial translation of Procedure for Settlement in the Gaza Strip by Residents of Judea and Samaria Area, https://www.gisha.org/UserFiles/File/LegalDocuments/procedures/settlement/32en.pdf May 2018, para. 1(A); Gisha, The Separation Policy: List of references, July 2014

[108]Order No. 1650 regarding Prevention of Infiltration (Amendment No. 2) of 13 October 2009 [Hebrew], unofficial English translation available via: http://www.hamoked.org/items/112301_eng.pdf. See also Assem Khalil, *Impact of Israeli military order No.1650 on Palestinians' rights to legally reside in their own country*, CARIM Analytic and Synthetic Notes 2010/46, https://fada.birzeit.edu/bitstream/20.500.11889/2408/1/900.pdf.

deportation.[109] Palestinians in the West Bank have been deported to Gaza irrespective of their length of residence in the West Bank, their connections to the territory, and the conditions of life in Gaza.

The implementation of the permit system

The permit system and restrictions of movement are often implemented in an arbitrary manner. The Palestinian civil society organisation, Miftah, aptly described the role of the permit system and restrictions of movement in the occupation and settlement enterprise as follows:

> This is an occupation ultimately enforced by tanks and bombs, and through the omnipresent threat, if not application, of violence. But its primary instruments are application forms, residency permits, population registries and title deeds. On its own, no cease-fire will relieve the beleaguered Palestinians.
>
> Gaza is virtually cut off from the outside world by Israeli power. Elsewhere, in the West Bank and East Jerusalem, the ongoing Israeli occupation comprehensively infuses all the normally banal activities of Palestinians' everyday lives: applying for permission to access one's own land; applying for what Israel regards as the privilege - rather than the right - of living with one's spouse and children; applying for permission to drive one's car; to dig a well; to visit relatives in the next town; to visit Jerusalem; to go to work; to school; to university; to hospital. There is hardly any dimension of everyday life in Palestine that is not minutely managed by Israeli military or bureaucratic personnel.
>
> Partly, this occupation of everyday life enables the Israelis to maintain their vigilant control over the Palestinian population. But it also serves the purpose of slowly, gradually removing Palestinians from their land, forcing them to make way for Jewish settlers.[110]

Restrictions of movement and permit requirements[111] are imposed on Palestinians in an often violent and degrading manner. The greater the restrictions of movement and permitting requirements, the more frequently Palestinians are required to interact with the Israeli State and military. The testimony of man from the West Bank that Ekō interviewed provides but one example:

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[109]UN OHCHR, *Thematic Report: Detention in the context of the escalation of hostilities in Gaza (October 2023-June 2024)* (31 July 2024), https://www.un.org/unispal/wp-content/uploads/2024/07/20240731-Thematic-report-Detention-context-Gaza-hostilities.pdf, para. 4.

[110] Miftah, *Occupation by Bureaucracy — Saree Makdisi* (25 June 2008), https://miftah.org/Display.cfm?DocId=17232&CategoryId=5.

[111]Gisha, Movement of people via Rafah crossing, https://gisha.org/en/graph/movement-of-people-through-rafah-crossing/?__cf_chl_tk=fSi2HgKOyXXoLywuLp6RaKQJNrHCM31CkkKPhFudvZI-1793099602-1.0.1.1-Y5_C.UA1CmT1FYDpNxSKoQC1SrNoIg0LJT76vnc3orY 3 July 2022; Breaking the Silence, Military Rule: Testimonies of soldiers from the Civil Administration, Gaza DCL and COGAT, https://www.breakingthesilence.org.il/inside/wp-content/uploads/2022/07/Military_rule_testimony_booklet.pdf 2011–2021, pp. 30–32.

> Additionally, crossing the Bartaa checkpoint into Bartaa Al-Sharqiya has become extremely dangerous. In 2025, three young men from the village of Al-Masliya, near Jenin, were killed by Israeli forces, and then their bodies were left at the checkpoint. I was on my way there at the time and witnessed the bodies of the three young men lying at the checkpoint, an experience that filled me with profound fear.
>
> In addition, the constant changes and lack of clarity in the procedures for crossing the checkpoint - particularly when driving- have significantly heightened my anxiety. On the last occasion I approached the checkpoint by car, I drove toward the Israeli soldier and presented my ID, as I had done previously. However, they began shouting at me, and several soldiers quickly surrounded my vehicle with their weapons pointing in my direction. They told me that I should have stayed in my car away from them, turned off the engine, removed the keys, taken my ID and vehicle registration documents, and approached them on foot to hand over the documents directly, rather than remaining in the car.
>
> At that moment, I realized that such a procedural “mistake” could potentially cost me my life. This realization has deepened my ongoing fear and anxiety of passing through the checkpoint.

The Al Munasseq Application

Al Munasseq, available on Android and iOS, digitises parts of Israel’s permit system on the OPT.[112] It is instrumental to the operation and implementation of Israel’s permit system, to the restrictions of Palestinians’ movement, and to the territorial fragmentation and separation of the Palestinian people.

The Google Play store describes the Application’s functions as follows:

> This application allows residents to receive information and perform the following actions in front of the Coordination of Government Activities in the Territories:
>
> - Articles, reports, and information vital to the daily life of the Palestinian population.
>
> - View the permissions available to the user.
>
> - Check for a security ban.
>
> - Submitting a request to lift a security ban.

[112] Apple, App Store for iPhone, "المنسق – تطبيق من أجل السكان الفلسطينيي", by Government of Israel — Ministry of Defense, (version consulted: version 3.3.1, updated on 29 March 2026), https://apps.apple.com/be/app/%D8%A7%D9%84%D9%85%D9%86%D8%B3%D9%82/id1455208205; Google Play, *AlMunasseq*, by EvenDigital (version consulted: version 3.3.1, updated on 26 March 2026), https://play.google.com/store/apps/details?id=com.evendigitals.elMunasseqek&hl=en-US

- Submit permit requests[113]

A similar description is provided on the Apple App store.[114]

History of Al Munasseq

In February 2019, Israel's Coordinator of Government Activities in the Territories (COGAT) launched Al Munasseq ("The Coordinator"), a mobile app to digitize the permit system Palestinians must navigate to travel and work in Israel.[115] During the COVID-19 pandemic, COGAT closed its District Coordination Offices on health ministry orders and directed Palestinians to the app instead.[116] COGAT described the app as a recommendation, not a requirement. But according to Israeli human rights organization HaMoked, the instruction to download it was sometimes presented as a condition for receiving a stay permit, so use became effectively compulsory.[117]

In May 2020, HaMoked petitioned the High Court of Justice over the app's terms of use.[118] The terms, which users had to accept in full, claimed the right to:

- use collected information "for any purpose, including for security purposes";[119]
- store users' information in COGAT's databases according to its own considerations;[120]
- give COGAT and third parties access to users' photos, files, contacts, location and correspondence;[121]
- limit deletion of user data, with no deletion possible once data had been transferred to other entities.[122]

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[113] Google Play, AlMunasseq, by EvenDigital (version consulted: version 3.3.1, updated on 26 March 2026), https://play.google.com/store/apps/details?id=com.evendigitals.elMunasseqek&hl=en-US.

[114] Apple, App Store for iPhone, "المنسق – تطبيق من أجل السكان الفلسطينيي", by Government of Israel — Ministry of Defense, (version consulted: version 3.3.1, updated on 29 March 2026), https://apps.apple.com/be/app/%D8%A7%D9%84%D9%85%D9%86%D8%B3%D9%82/id1455208205.

[115] Haaretz May 15, 2020 Israel Tells Court Would Stop Forcing Palestinian Laborers to Give Access to Phone Data https://www.haaretz.com/middle-east-news/palestinians/2020-05-15/ty-article/.premium/over-50-000-palestinians-forced-to-give-phone-data-to-israel/0000017f-e821-dc7e-adff-f8ad15a70000 ;

[116] HaMoked, 2 June 2020: https://hamoked.org/document.php?dID=Updates2175

[117] HaMoked, 2 June 2020: https://hamoked.org/document.php?dID=Updates2175

[118] HaMoked, 2 June 2020: https://hamoked.org/document.php?dID=Updates2175

[119] Haaretz May 15, 2020 Israel Tells Court Would Stop Forcing Palestinian Laborers to Give Access to Phone Data https://www.haaretz.com/middle-east-news/palestinians/2020-05-15/ty-article/.premium/over-50-000-palestinians-forced-to-give-phone-data-to-israel/0000017f-e821-dc7e-adff-f8ad15a70000 ;

[120] Haaretz May 15, 2020 Israel Tells Court Would Stop Forcing Palestinian Laborers to Give Access to Phone Data https://www.haaretz.com/middle-east-news/palestinians/2020-05-15/ty-article/.premium/over-50-000-palestinians-forced-to-give-phone-data-to-israel/0000017f-e821-dc7e-adff-f8ad15a70000.

[121] HaMoked, 2 June 2020: https://hamoked.org/document.php?dID=Updates2175

[122] HaMoked, 2 June 2020: https://hamoked.org/document.php?dID=Updates2175

When COGAT's Civil Administration agreed to update the terms, it cited a discrepancy between the terms and the app's actual permissions. It also defended those permissions: location to schedule checkpoint appointments, and the camera and files to scan and store documents.[123] After the petition was filed, COGAT narrowed the terms. It claimed that consent covered only the data needed for each service and that the app had no access to users' files, contacts or photos.[124]

On 17 May 2020, the court dismissed the petition on procedural grounds. It ruled that HaMoked should have waited longer for the state's response and had not shown actual harm.[125] HaMoked then asked COGAT what data had been extracted from phones before the terms changed, and where it had been transferred. No public response has been reported.

Despite COGAT's claims to not have access to files,[126] Ekō's review of the Application shows that access to files and photos is still there. Below is a summary of the review - the full technical report can be found in the Annex:

- **Contacts:** the app does not request access to contacts.
- **Storage:** it still requests broad read and write access to shared storage. On Android 9 and below, this exposes photos and downloaded files. These are the permissions at the centre of HaMoked's petition, and they contradict COGAT's claim to the court that the app had no access to files.
- **Location, camera and NFC:** it requests precise location, the camera and NFC (Near Field Communication – a short-range wireless technology that lets electronic devices talk to each other by tapping or bringing them within a few centimeters).
- **Persistence:** it requests a set of permissions that let it run continuously and start automatically when the phone boots.
- **Advertising:** several permissions have no plausible administrative purpose. The advertising identifier, ad attribution and install-referrer permissions indicate that data from a population compelled to use the app is also flowing into commercial advertising infrastructure.

The HaMoked case narrowed the terms, but the app's core access remains. Formally, users can decline individual permissions. But for Palestinians whose work, travel and medical access depend on the app, refusal is not a real option.

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[123] Haaretz May 15, 2020 Israel Tells Court Would Stop Forcing Palestinian Laborers to Give Access to Phone Data https://www.haaretz.com/middle-east-news/palestinians/2020-05-15/ty-article/.premium/over-50-000-palestinians-forced-to-give-phone-data-to-israel/0000017f-e821-dc7e-adff-f8ad15a70000.

[124] HaMoked, 2 June 2020: https://hamoked.org/document.php?dID=Updates2175

[125] HaMoked, 2 June 2020: https://hamoked.org/document.php?dID=Updates2175

[126] HaMoked, 2 June 2020: https://hamoked.org/document.php?dID=Updates2175

Al Munasseq as a permitting system

Al Munasseq is used for substantial parts of the permit system. The interviews Ekō conducted in the OPT indicate that Al Munasseq is (or has been) used in the process of applying for and/or maintaining *at least* the following permits:

- Work permits (West Bank)
- “Job search” permits (West Bank)
- Trader (“business meeting”) permits (West Bank)
- Religious permits (West Bank)
- Departure abroad (West Bank)
- Medical permits (West Bank)

There are likely tens of other categories of permits, but the serious occupation-induced security risks to witnesses and associated climate of pervasive fear did not permit a wider investigation into the required use of the Al Munasseq Application. It is however highly likely that the Al Munasseq Application is also used for those permits, including medical training, academic conferences, visiting a patient, school employee and school student in East Jerusalem — in as far as those permits are in fact granted and COGAT’s procedures are functional in respect of those categories.

Through a series of interviews that Ekō conducted in Gaza and the West Bank, including East Jerusalem, we have been able to demonstrate that Al Munasseq is used for significant aspects of Israel’s permit system for Palestinians. In particular:

1. Al Munasseq is used by Palestinians in the West Bank to apply for certain permits for entry and travel to and from East Jerusalem and Israel.
2. Al Munasseq was used by Palestinians in Gaza to renew certain permits for entry into Israel and to the West Bank (such as work, medical and trader permits), following an in-person application to obtain the initial permit in the first instance. However, the full closure of Gaza since 7 October 2023 has rendered such permits obsolete.
3. Al Munasseq is used by Palestinians in the West Bank (and was used by Palestinians in Gaza) to make applications for appointments to obtain biometric smart cards or “magnetic cards”, which are required to cross checkpoints into East Jerusalem, Israel, and the Seam Zones. There are also grounds to conclude that Al Munasseq is used for that purpose in order to enable residents to enter closed off villages in the West Bank. Furthermore, there is reason to believe that the Application is used for the same purpose in respect of entry to settlements.
4. Al Munasseq is used to communicate the outcome of permit applications to Palestinian applicants, to provide the permit if approved, and to convey any conditions.

Permit holders use the Application to view their permits/ permissions.

1. Al Munasseq is used to communicate “security bans” to Palestinians associated with their permit applications.
2. Palestinians in the West Bank use the Application to report their return to the West Bank, under the “closing the circle” procedure.

As of at least July 2024, it is mandatory for a range of West Bank short-term permit holders to report their return (termed "closing the circle" by the Israeli occupation authorities) to the West Bank (excluding East Jerusalem), and to prove that that return occurred within the conditions stipulated on the permit, including within the timeframe permitted.[127] This can be done through either (a) a service 'kiosk' at a checkpoint including a pedestrian crossing, and requiring use of the magnetic card, or (b) using the Al Munasseq Application, with which one should perform facial recognition by virtue of taking a picture of one's self ("selfie"), and enabling location identification using the GPS of the mobile device.[128]

One person Ekō interviewed said:

> "*After 2023, I stopped using Al Munasseq application altogether and ceased applying for permits. The restrictions had become stricter, including requirements to confirm return through photographs and location sharing, among other measures. As a result, I deleted the application and disposed of the phone on which it had been installed, fearing that the occupation authorities might use it to monitor me and my private life. I subsequently purchased a new phone*."

Use of the Application is either mandatory or strongly encouraged by Israeli authorities, and the testimonies demonstrate that Palestinians considered that they had no alternative but to use the Application for the purposes outlined above. That is not surprising, given the level of control asserted by Israel as the illegally occupying power within the OPT.

While COGAT insisted in 2020 that the Application's use was made non-mandatory again, the later, more extensive, roll-out of the Application also appeared to affirm its mandatory nature or quasi-mandatory nature. For example, at least five Palestinians in the West Bank that Ekō interviewed indicated the Application had become mandatory to obtain permits or 'biometric ("magnetic") cards' in the West Bank. One said:

> "*I was therefore compelled to download the Al Munasseq application, as I had no alternative. Prior to Al Munasseq application, I used to go to the military liaison office in the village of [REDACTED] to complete the necessary paperwork. However, that procedure was discontinued, and all applications are now processed exclusively through the Al Munasseq app. When I downloaded the Al Munasseq application, I was prompted to grant permissions allowing access to my messages, photos, GPS location, notifications, and other data. I felt that I had no option but to approve these permissions in order to continue with the process*."

Another person:

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[127] Israel, Ministry of Defence, *Subject: Reporting procedure back to the Judea and Samaria region "closing the circle"* (27 June 2024), https://www.gov.il/he/pages/judea-samaria-reporting-procedure [Hebrew].
[128] Israel, Ministry of Defence, *Subject: Reporting procedure back to the Judea and Samaria region "closing the circle"* (27 June 2024), https://www.gov.il/he/pages/judea-samaria-reporting-procedure [Hebrew].

> "*Before the COVID-19 pandemic, we used to apply for permits through the Palestinian Liaison Office. I would submit my application either at the office in the city of Nablus or at the liaison office in Ramallah on Nuzha Street.*
>
> *After that, I learned that there were no longer any legal alternatives for obtaining permits except through the Al Munasseq application. The only other option was through smugglers, who at the time charged approximately 300 Israeli shekels to illegally transport people ...*"

Another described how the Application was used to communicate whether the permits were approved or denied:

> "*I previously used Al Munasseq application around 2022 to check whether a permit application I had submitted to pray at Al-Aqsa Mosque had been approved. I understood that through this application I could see whether my request had been accepted or rejected. I learned about the app after applying for a permit at the Civil Affairs office in Gaza, where some people told me I could track my application through Al Munasseq. So I downloaded and used it on my phone.*
>
> *When I applied for the permit through the application, my request was rejected multiple times. These rejections affected me deeply, as I had always wished to visit and pray at Al-Aqsa Mosque, especially on Laylat al-Qadr. …*
>
> *After several rejections and being unable to determine the reason - since the application did not provide explanations - I tried again approximately two years later. This time, my application for a religious visit permit was approved. Honestly, I was surprised but extremely happy when I received the news. I was contacted and instructed to be present the following morning at Al-Katiba Al-Khadra square to travel to pray at Al-Aqsa Mosque. I prepared quickly and could not sleep that night out of longing to see the mosque*."

Al Munasseq's role in the revocation of permits in October 2023 from Gaza Strip residents, and their subsequent arbitrary detention and torture

As of 7 October 2023, Israel proceeded to revoke the permits of an estimated ten thousand Palestinians with Gaza as their registered address in the population registry, including work permits and medical permits, and including of children and elderly people.[129] Palestinians from

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[129] UN OHCHR, *Thematic Report: Detention in the context of the escalation of hostilities in Gaza (October 2023-June 2024)* (31 July 2024), https://www.un.org/unispal/wp-content/uploads/2024/07/20240731-Thematic-report-Detention-context-Gaza-hostilities.pdf, para. 4; Adalah, Gisha, HaMoked, ACRI, Bimkom and PHRI, *Extremely Urgent Re: Involuntary confinement of workers from the Gaza Strip in Israeli detention facilities* (12 October 2023), https://static.gisha.org/uploads/2023/10/Workers-letters-october-2023-1.pdf; Addameer, Al-Mezan and Al-Haq, *Joint Submission to UN Special Rapporteur on the situation of human rights in the Palestinian territories occupied since 1967 - Submission I* (December 2025), https://www.alhaq.org/cached_uploads/download/2025/12/16/ah-am-a-submission-i-sr-opt-torture-10-december-1765892761.pdf, p. 24 (containing testimony of the arrest and detention of S.D., a 52-year old cancer patient from the Gaza Strip with a medical permit); Fatima AbdulKarim, "Gazan patients and workers still stranded in West Bank four

the Gaza Strip were subsequently deemed 'infiltrators' or 'illegal aliens',[130] and arrested, held incommunicado, and subjected to torture, cruel, inhuman and degrading treatment[131] in detention.[132] UN OHCHR "estimated that 3,200 of them were released and transferred into Gaza in November 2023, 6,441 were transferred to the occupied West Bank, while around 1,000 of them remain unaccounted for."[133]

The relevant permits were revoked including through use of the Al Munasseq Application.[134] They were not only indicated as revoked, but any trace of them ever having existed was removed from the Application.

The removal of permits, and removal of any trace of the permit's existence, from the Al Munasseq Application further appears permitted by its terms of use — at least on the basis of the latest published version that could be found in the public domain, which requires the User to agree that:

> "*we ["COGAT — Civil Administration for the Area of Judea and Samaria" (sic. — West Bank)] shall be entitled, at any time and without prior notice, to block your access to the application, the Content and/or the Services therein, in whole or in part, temporarily or permanently, at our sole discretion, for security or policy considerations, or in cases where concern arises that you have violated the provisions of the Agreement or the provisions of the law, or for considerations related to information security and risk management, in addition to any other remedy that may be available to us under any applicable law.*";[135]
>
> *"[t]he availability and functionality of the application, the Content and the Services therein depend on many factors that are not within our control, including software,*

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months on", *+972 Magazine* (23 February 2024), https://www.972mag.com/gaza-patients-workers-permits-west-bank/.

[130] Adalah, Gisha, HaMoked, ACRI, Bimkom and PHRI, *Extremely Urgent Re: Involuntary confinement of workers from the Gaza Strip in Israeli detention facilities* (12 October 2023), https://static.gisha.org/uploads/2023/10/Workers-letters-october-2023-1.pdf.

[131] A.A., I.D. No. XXXXXX et 567 al. in attached list v. Israel Defense Forces, Chief Military Police Officer, Israel Prison Service Commissioner *et al.*, HCJ 7946/23, *Petition for Writ of Habeas Corpus,* 2 November 2023, [Hebrew], unofficial English translation available via: https://static.gisha.org/uploads/2023/12/ICJ_Habeas_Corpus_HaMoked_Gisha_November_2_2023.pdf;

[132] Addameer, Al-Mezan and Al-Haq, *Joint Submission to UN Special Rapporteur on the situation of human rights in the Palestinian territories occupied since 1967 - Submission I* (December 2025), https://www.alhaq.org/cached_uploads/download/2025/12/16/ah-am-a-submission-i-sr-opt-torture-10-december-1765892761.pdf, pp. 22-25.

[133] UN OHCHR, *Thematic Report: Detention in the context of the escalation of hostilities in Gaza (October 2023-June 2024)* (31 July 2024), https://www.un.org/unispal/wp-content/uploads/2024/07/20240731-Thematic-report-Detention-context-Gaza-hostilities.pdf, para. 4.

[134] Human Rights Watch, *Israel: Gaza Workers Held Incommunicado for Weeks* (3 January 2024), https://www.hrw.org/news/2024/01/03/israel-gaza-workers-held-incommunicado-weeks; Gisha, *Secretly and unlawfully, Israel detained thousands of Palestinians from Gaza* (14 December 2023), https://gisha.org/en/secretly-and-unlawfully-israel-detained-thousands-of-palestinians-from-gaza/.

[135] Coordinator of Government Activities in the Territories (COGAT) — Civil Administration for the Area of Judea and Samaria, *Terms of Use for the "Al Munasseq" Application* (6 July 2020, page last updated 23 February 2025), https://www.gov.il/ar/pages/application_terms [Arabic] and https://www.gov.il/he/pages/application_terms [Hebrew]. These terms were found by clicking a hyperlink on the App store.

hardware, communications networks, the security situation, directives of the political level";[136]

"[w]e may, from time to time, make various changes to the application at our sole discretion and without advance notice".

And that the terms of use provide a "*licence that is fully revocable at any time, to use the application*".

In a letter by Israeli civil society organisations to the Minister of Defence, COGAT, and Israel's Attorney General:

> *"The revocation of the permits and their deletion from the Al Munasseq application constitutes a prohibited act of vengeance against the workers. This act, deliberately and in bad faith, deprives the workers of the proof they possessed with regard to the reason for their lawful presence in Israel. The consequences of this action may be fateful as it jeopardizes the workers' legal status and, more serious still, increases the risk to their lives and bodily integrity*."[137]

In effect, the bodily integrity of those permit holders would be severely degraded as they would be subjected to serious bodily harm,[138] as described by one person from Gaza that Ekō interviewed, working in Israel in early October 2023:

> *"I used to return to Gaza approximately once every 15 days, as my work was in the north and it was very difficult to return weekly.*

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[136] Coordinator of Government Activities in the Territories (COGAT) — Civil Administration for the Area of Judea and Samaria, *Terms of Use for the "Al Munasseq" Application* (6 July 2020, page last updated 23 February 2025), https://www.gov.il/ar/pages/application_terms [Arabic] and https://www.gov.il/he/pages/application_terms [Hebrew]. These terms were found by clicking a hyperlink on the App Store.

[137] Adalah, Gisha, HaMoked, ACRI, Bimkom and PHRI, *Extremely Urgent Re: Involuntary confinement of workers from the Gaza Strip in Israeli detention facilities* (12 October 2023), https://static.gisha.org/uploads/2023/10/Workers-letters-october-2023-1.pdf.

[138] On workers in detention, see Addameer, Al-Mezan and Al-Haq, *Joint Submission to UN Special Rapporteur on the situation of human rights in the Palestinian territories occupied since 1967 - Submission I* (December 2025), https://www.alhaq.org/cached_uploads/download/2025/12/16/ah-am-a-submission-i-sr-opt-torture-10-december-1765892761.pdf, pp. 22-25; UN HRC, *"More than a human can bear": Israel's systematic use of sexual, reproductive and other forms of gender-based violence since 7 October 2023, Independent International Commission of Inquiry on the Occupied Palestinian Territory, including East Jerusalem, and Israel*, A/HRC/58/CRP.6 (13 March 2025), https://www.ohchr.org/sites/default/files/documents/hrbodies/hrcouncil/sessions-regular/session58/a-hrc-58-crp-6.pdf, para. 98: one "particularly egregious cases of sexual and gender-based violence during arrest and detention that were filmed and disseminated online by soldiers … involved a video depicting severe mistreatment and abuse of male detainees. The video was posted on X and Telegram by Israeli soldiers. The Commission [Independent Commission of Inquiry] geolocated it to Hebron, in the West Bank, noting it was filmed on 31 October 2023. In the footage, six men are seen blindfolded, undressed and lying on the ground. Two of the men are completely naked with their genitals exposed. The Commission documented conflicting information regarding the reasons for the men's capture, with the ISF claiming they were Hamas militants and other sources stating that they were workers from Gaza. One of the naked men appears to be unconscious or lifeless, while the other is yelling in pain before being pushed to the ground. A soldier is seen stepping on the face of one man who is wearing only trousers with his hands and feet tied. The man is then pulled by his legs, while yelling in pain". UNGA, *Report of the Independent International Commission of Inquiry on the Occupied Palestinian Territory, including East Jerusalem, and Israel*, A/79/232 (11 September 2024), https://www.undocs.org/A/79/232, paras. 41, 43.

Things continued like this until I was arrested inside Israel in Deir al-Asad on October 10, 2023. The place where I was staying was raided by three Israeli military jeeps and around 15 heavily armed soldiers. They aimed their weapons and lasers at me and my colleagues. There were seven of us, all from the Gaza Strip. They instructed us to surrender and not move, or they would shoot us all. They then forced us to strip naked and conducted a full body search. They confiscated all my personal belongings, including my money, phone, and ID. My hands were tied behind my back, and my eyes were blindfolded, along with the others. We were taken to a police station in Majd al-Krum, where files were prepared for us, and we spent a full day there.

The following morning, I was transferred to Ofer prison, where I was interrogated, mocked, provoked, and insulted. My detention lasted one month and ten days, during which we were subjected to torture and severe beatings. The cold was piercing my body due to the lack of adequate clothing and insufficient blankets. I was only given a very thin blanket that did not protect against the winter cold, and a thin mattress unsuitable for sleeping.

After one month and ten days, an officer suddenly called my name along with a group of detainees. They cuffed our hands and legs, and we were blindfolded and taken onto a bus. I did not know where I was being taken and did not realize I was being returned to Gaza. After some time, the bus stopped, and they removed my handcuffs and blindfold. I found myself at Kerem Shalom crossing. The soldiers ordered us to walk forward without looking left or right, threatening to shoot otherwise. I walked for approximately five hours until I reached Rafah crossing. When I arrived, I contacted my brother, who came to pick me up.

After my release, the Israeli army did not return my phone, money, or personal belongings, despite having made me sign documents during my detention in Ofer prison stating that my belongings would be returned upon release. I also did not receive my labor rights or my final salary from my employer."

Israeli authorities have described Al Munasseq as a tool offered for the convenience and welfare of the area's residents.[139] The evidence in this report shows otherwise. Al Munasseq is the channel through which Israel's permit regime requests, grants, refuses, conditions and erases Palestinians' permission to move, and, as the next section shows, a channel through which it can collect their data.

[139] Haaretz May 15, 2020 Israel Tells Court Would Stop Forcing Palestinian Laborers to Give Access to Phone Data
https://www.haaretz.com/middle-east-news/palestinians/2020-05-15/ty-article/.premium/over-50-000-palestinians-forced-to-give-phone-data-to-israel/0000017f-e821-dc7e-adff-f8ad15a70000.

Al Munasseq's invasive permissions

Despite HaMoked's intervention in 2020, the Application requests a set of permissions that go well beyond what a permit-checking tool needs. After conducting a technical review in July 2026 with the help of cybersecurity group IronSky (Pty) Ltd as well as Tech for Palestine, we have found that the Application carries commercial advertising and analytics infrastructure that has no administrative purpose, that it is built to run continuously and to restart whenever the phone is switched on, and that it can determine the user's location by two independent methods. It holds several capabilities that are difficult to justify at all, including silent reading of identity-document chips and detection of the user's own screenshots. The full technical review can be found in the Annex.

Individually these are capabilities rather than proven conduct. Assembled, and placed on the old, unpatched devices common among the affected users, they combine into coherent chains for surveillance, coercion, and remote compromise, and the practical risk is high.

What stands out most

- **Commercial tracking with no reason to be present.** Four permissions (AD_ID, ACCESS_ADSERVICES_AD_ID, ACCESS_ADSERVICES_ATTRIBUTION, BIND_GET_INSTALL_REFERRER_SERVICE) exist only to support advertising and install-campaign tracking. A government permit application has nothing to advertise, so their presence points to embedded third-party advertising or analytics code and a route by which user data can leave the device to commercial parties. This is the single most glaring concern.
- **A device that never stops working for the app.** Auto-start on boot, a foreground service, and a wake lock together keep the Application active around the clock, whether or not the user ever opens it.
- **Capabilities that fit surveillance more than administration.** Precise location paired with Wi-Fi-based positioning, broad access to stored files, silent NFC reading of identity documents, and screenshot detection.
- **The device context sharpens the danger.** On the older Android versions common in Gaza, several protections that would blunt these permissions are simply not present, so the risk resolves toward the more dangerous case rather than the safer one.

The latest publicly available privacy policy for the Application separately published by COGAT on 1 January 2024 and updated on 15 February 2024[140] does not appear to exclude COGAT's ability to share any data obtained through the Application with third-parties, including relevant authorities in Israel, such as Israel's General Security Agency (Shabak — Shin Bet) for the purpose of their intelligence gathering and exercise of other broad functions involving severe privacy violations against Palestinians, permitted to them under Israeli law, nor does it prevent such intelligence gathering through Unit 8200 or other arms of the army, as the privacy policy explicitly provides that information may be shared "to reveal, prevent, or otherwise handle … security issues".[141]

These broad privacy permissions moreover have real life consequences for the safety and security, including bodily integrity, of Palestinians. The previous section highlighted how various permit holders had their permit removed, including removed from the Application, and how numerous workers were suddenly arrested at their places of work, or elsewhere in Israel or the West Bank. The question poses itself whether the Application provided relevant Israeli authorities with access to mobile phone devices location services, and whether such access facilitated the enforced disappearance and detention of the workers and medical patients and their caretaking companions who had been provided permits on the basis of which they were present in the West Bank, including East Jerusalem, or in Israel.

Permissions as a surveillance tool

The scope of these permissions cannot be explained by the Application's stated purpose. Taken together, data on a person's location, files, photos, and daily routine allows a detailed profile of their life to be built. In the hands of a military authority that already controls whether Palestinians can work, receive medical treatment or see their families, such a profile could be used as a powerful instrument of surveillance and coercion. The Application also requests permissions associated with commercial advertising, which have no administrative function in a permit system and create a further route by which users' data can leave the device.

The consequences are serious. Location data, in particular, is not the neutral technical measurement it might appear to be. A continuous stream of your location over days and weeks reveals where you live, where you work, what religious institution you attend, what medical facilities you visit, and who you spend time with. When aggregated over time, it becomes a detailed map of your life: your habits, your relationships, your vulnerabilities. When that data is

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[140] A privacy policy was also published in the Hebrew PDF version of COGAT's Terms of Use for the Application (Coordinator of Government Activities in the Territories (COGAT) — Civil Administration for the Area of Judea and Samaria, *Terms of Use for the "Al Munasseq" Application* (6 July 2020, page last updated 23 February 2025), https://www.gov.il/ar/pages/application_terms [Arabic] and https://www.gov.il/he/pages/application_terms [Hebrew]. These terms were found by clicking a hyperlink on the App store), indicated as first published in 2020 and updated in 2025. However, since the "circle closure" requirement was only instated recently – that is, after 2023 – and the Terms of Use related privacy policy makes no mention of it, the 2024 separately published privacy policy is presumably the most up to date one.

[141] COGAT, *"Al Munasseq" app privacy policy* (21 January 2024, page last updated 15 February 2024), https://www.gov.il/he/pages/application_privacy_terms [Hebrew].

collected by an app that has no legitimate need for it, and then sold or shared, it is no longer yours in any meaningful sense.

The problem is compounded by the asymmetry of the permission dialogue itself. When an app asks for location access, it frames this as a simple, bounded question: yes or no. What it does not say is that granting this permission may mean that your location is logged every few minutes, indefinitely, transmitted to servers you have no knowledge of, sold to dozens of companies you have never heard of, and potentially accessed by governments or law enforcement without your knowledge or a warrant.

And if a user decides to revoke an application's permissions, for example to their photos, the application still has the user's photos stored from before permissions were revoked. That data does not get deleted unless a user specifically asks for it to be deleted. In the case of Al Munasseq, the Application did not offer any way for users to request for their data to be deleted — that only became an option for users after the HaMoked petition. And as it states in its privacy policy:

> *to the extent that information has been transferred to third parties pursuant to the terms of this Agreement and the privacy policy contained therein, we do not undertake or accept responsibility for acting to remove the information from those sources.*[142]

Technical risk evaluation: Potential chains to compromise

This section identifies potential chains of compromise, or what someone in control of Al Munasseq could do with the permissions made accessible to the application. This technical review looked at what the Application is able to do, not at how it has been used, as that information is not public.

With the permissions highlighted above, they would let the Application track a person's movements around the clock, even with GPS switched off; quietly copy photos and documents; install new code without the user noticing; detect when the user takes a screenshot; and link the

[142] A privacy policy was also published in the Hebrew PDF version of COGAT's Terms of Use for the Application (Coordinator of Government Activities in the Territories (COGAT) — Civil Administration for the Area of Judea and Samaria, *Terms of Use for the "Al Munasseq" Application* (6 July 2020, page last updated 23 February 2025), https://www.gov.il/ar/pages/application_terms [Arabic] and https://www.gov.il/he/pages/application_terms [Hebrew]. These terms were found by clicking a hyperlink on the App store), indicated as first published in 2020 and updated in 2025. However, since the "circle closure" requirement was only instated recently – that is, after 2023 – and the Terms of Use related privacy policy makes no mention of it, the 2024 separately published privacy policy is presumably the most up to date one.

user to commercial advertising profiles built elsewhere.

The risks are greatest for those least able to protect themselves. Many users, particularly in Gaza, rely on old phones that lack the safeguards newer phones have. Each of the six chains below sets out one of these paths, followed by what it would mean for the person holding the phone.

In summary, the clusters of compromise identified in the technical analysis are dangerous. The following chains describe how the declared permissions could be used together to watch, pressure, or compromise a person who depends on the Application. Each chain is a plausible path built from capabilities the Application's manifest actually grants.

Compromise chain 1: Continuous pattern-of-life surveillance

From the moment the phone is switched on the Application starts on its own, without the user opening it. A foreground service and a wake lock keep it alive and processing while the screen is off and the owner believes the device is idle. In that state it can sample precise GPS position and, separately, the identifiers of the Wi-Fi access points around it, each of which resolves to a place. Exact alarms let the sampling be timed, and the standing internet connection lets it be delivered continuously.

Over days and weeks these samples become a detailed record of a life: the home address and the hours the person is there, the daily route, the checkpoints crossed and when, the workplaces and homes visited, and the people whose networks the phone repeatedly joins. Because two independent location methods are in play, switching off GPS does not end the tracking.

Coercion and threat. Tied to the return-verification procedure introduced in 2024, which already requires a permit holder to prove a return by submitting a timestamped photo with location active, a convenience feature becomes an instrument of compliance. Movement itself is made conditional on being tracked, and the operator holds a continuous positional history that can be used to locate a person, predict their movements, or apply pressure by threatening the permit on which their movement depends.

Compromise chain 2: Silent harvest of personal files

On the older Android versions common in this setting, read access to shared storage exposes the whole of it: photographs, voice notes and images saved by WhatsApp, downloaded PDFs, scanned documents, and files written by any other application. A persistent background process and an open network connection place the Application in a position to enumerate, read, and send that content quietly, and the download permission removes the status-bar indicator that would normally accompany a transfer.

Nothing in this sequence requires the user to open the Application or approve an action. The collection can run in the background while the phone appears idle.

Coercion and threat. A person's private messages, family photographs, political or religious material, and the documents of everyone they correspond with can be copied without prompt or trace. Material of this kind is the raw ingredient of blackmail. The mere knowledge that it could be held is a means of pressure in its own right, whether or not it is ever used, and it exposes not only the user but every contact whose files have passed through the phone.

Compromise chain 3: Identity capture at the point of contact

Palestinian identity documents and some permit cards carry NFC chips. The NFC permission lets the Application read such a chip the instant a card is brought near the phone, silently, with no need for the holder to photograph or type anything. In the same moment the camera can capture the physical document and the person presenting it, storage can hold the images, precise location can record where the encounter took place, and the network connection can move the result off the device.

Each of these is an ordinary capability on its own. Their value is in the correlation: a single tap can bind together the chip contents, a facial image, a document scan, and an exact place and time.

Coercion and threat. In one interaction at a checkpoint or an office, the Application can assemble a verified identity record that is richer and more authoritative than anything the holder knowingly provides. The reading happens through hardware contact that the holder cannot easily see or refuse, which makes it a quiet route to building a dossier on a person and on the documents they carry.

Compromise chain 4: Remote reach and interaction-free compromise

This chain is the most serious, because the manifest supplies every link of a remote-compromise path in a single package, on a device that is kept permanently reachable. A persistent Firebase Cloud Messaging connection, held open by the wake lock and the foreground service, means a message can arrive at any hour with no action by the user. A push payload is processed automatically the moment it is received, and on an operating system that no longer receives security updates a crafted payload that meets an unpatched flaw can run code before anything appears on screen.

From there the remaining permissions extend the foothold. The silent download permission lets a follow-on component arrive with no visible trace. Exact alarms and auto-start on boot let it lie dormant and re-arm itself at a chosen time and across restarts. On devices below Android 12, the dialog-dismissal permission can close any system warning that might otherwise reach the owner. The same push notification mechanism was the delivery route for commercial spyware of the Pegasus class, which achieved compromise with no user interaction, and the class of flaw it relied on has equivalents on Android.

Coercion and threat. The Application does not need to be malicious for this to matter. It assembles, in one place, a remotely reachable listener, a silent delivery path, a persistence

mechanism, and a way to suppress warnings. That is the full shape of a remote-trigger attack, one that could be fired at a time of the operator's choosing against exactly the users whose old and unpatched phones are least able to withstand it.

Compromise chain 5: Detecting and deterring the user's own evidence

When a permit holder tries to photograph the screen, to capture a refusal, an error, or the Application's own behaviour so as to seek legal help or document mistreatment, the screenshot-detection permission notifies the Application that the capture happened. The ability to read and change Do Not Disturb, together with the notification and timing permissions, means the operator can also control when and how messages reach the user and can push them through even a silenced phone.

The user is therefore watched at the precise moment they attempt to create a record, and the channel through which they receive information is held by the party they are trying to hold to account.

Coercion and threat. This both deters documentation and reveals it. A person seeking to gather evidence of how the Application or the permit system treats them learns that the attempt itself is observed, which chills the very act of seeking accountability and hands the operator advance notice of it.

Compromise chain 6: Deanonymisation through commercial advertising data

Through the advertising permissions the Application can obtain the device's advertising identifier, the same identifier that commercial advertising networks use to link one person's activity across every application they run. Install-referrer data ties the installation itself to a source or campaign. These permissions have no administrative function, so the most likely reason for their presence is advertising or analytics code that carries them as a dependency.

The consequence reaches beyond the Application. The advertising identifier is a bridge between this Application's user and a commercial profile assembled elsewhere, covering other applications used, inferred interests, and movements, and, through data brokers, frequently a real-world identity.

Coercion and threat. A user of a government permit application is thereby linked to a body of commercial behavioural data they never knowingly surrendered. Any party that operates or acquires access to that advertising data, whether the operator directly or through purchase from the advertising market, can enrich a permit holder's file with it. Because the identifier is requested through both the old and the new mechanisms, it can be obtained regardless of the device's Android version.

Al Munasseq as a tool of apartheid

As outlined in the above chapters, it is beyond reasonable doubt that free movement is not allowed throughout the OPT, and that specifically movement from the Gaza Strip to the West Bank or vice versa is only allowed in exceptional circumstances. Those exceptional circumstances, when met, can enable the issuance of a specific permit to a Palestinian resident of the OPT, allowing movement for a specific purpose, during or at a specific date(s), and at a specific time. Such permits are considered a privilege, not a right, by the occupying power, and issued or revoked at its discretion.

For several categories of permits, there is conclusive proof that Al Munasseq is used. For example, it is clear that medical permits or medical accompanying permits for Gaza Strip residents — including to the West Bank — may involve the use of the Al Munasseq Application in order to follow-up on a permit request and assess whether a permit has been approved or rejected. Though worth noting that since October 2023, Israel has severely restricted the medical referral route from Gaza to the West Bank, including East Jerusalem.[143]

There is similarly conclusive proof that Al Munasseq is used in the case for work or traders' permits for Gaza Strip residents, who may also use the Al Munasseq Application in order to request additional permits.

Beyond movement: the cumulative toll on Palestinians' rights

Freedom of movement is the right on which many others depend. In the OPT, Israel has turned it into a privilege it grants and withdraws at will, and in doing so has made almost every part of Palestinian life conditional on its permission.

The restrictions documented in this report, and the Application that administers them, do not operate in isolation. Their effects compound, which means that a denied permit means a missed chemotherapy session. A closed checkpoint means a lost job and an empty classroom. A residency rule means a family divided by a wall. Over decades, and with sharp escalation since October 2023, the result is a population whose health, livelihoods, education, family life and religious life are held hostage to a system of control — a system that, by fragmenting the Palestinian people and their land, also denies them their right to self-determination.

In 2024 the ICJ found Israel's "entire regime on the movement of Palestinians throughout the Occupied Palestinian territory" had a discriminatory effect on the enjoyment of Palestinians on

[143] Limited medical evacuations from Gaza continue – OCHA press release 17 February 2026 https://www.un.org/unispal/document/limited-medical-evacuations-from-gaza-continue-ocha-press-release

their right to free movement, right to work, to health, to education and to an adequate standard of living; "as well as to the right to be protected from arbitrary or unlawful interference with family life, as guaranteed under Article 17 of the ICCPR." As such, the Court was "of the view that Israel's policies restricting freedom of movement amount to prohibited discrimination under Articles 2, paragraph 1, and 26 of the ICCPR, Article 2, paragraph 2, of the ICESCR, and Article 2 of CERD."[144]

The UN Human Rights Committee has observed:

> "The Committee reiterates its deep concern about the continuing restrictions on freedom of movement imposed by the State party throughout the Occupied Palestinian Territory, including East Jerusalem, through its discriminatory permit regime and the designation of access-restricted areas. It is further concerned that, in enforcing movement and access restrictions, the Israeli security forces often use lethal force, such as live ammunition, leading to deaths and serious injuries of, inter alia, Palestinian commuters from the West Bank to the Israeli settlements or Israel […] (arts. 2, 12 and 26)."[145]

The restrictions on movement and the permit system also impact on and violate other rights, including the prohibition of racial discrimination, right to family life, the right to health, the right to education.[146]

Right to health

Under both the law of occupation[147] and human rights law,[148] Israel is obliged to guarantee the right to health of the Palestinian population as an occupying power.

Jerusalem, as the capital of Palestine, retains the most advanced and specialised hospitals and medical care, and Palestinians across the OPT have no other option for certain complex illnesses but to receive treatment there — yet are not allowed free movement to Jerusalem and

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[144] ***Palestine Advisory Opinion***, para. 206.

[145] *UN Human Rights Committee, Concluding observations on the fifth periodic report of Israel, CCPR/C/ISR/CO/5 (5 May 2022), para. 36,* https://documents.un.org/doc/undoc/gen/g22/335/33/pdf/g2233533.pdf

[146] *General Comment No.7*: *The right to adequate housing (Art.11(1)): forced evictions* (CESCR, May 1997) E/1998/22 https://emergency.unhcr.org/sites/default/files/2023-12/General%20Comment%20No.%207%20-%20The%20right%20to%20adequate%20housing%20%28Art.11.1%29%20-%20forced%20evictions.pdf; *Concluding observations on the fourth periodic report of Israel* (CESCR, 12 November 2019). https://documents.un.org/doc/undoc/gen/g19/322/94/pdf/g1932294.pdf
See also: *Concluding observations on the fifth periodic report of Israel* (HRC, 5 May 2022).

[147] ***Obligations of Israel in Relation to the Presence and Activities of the United Nations, other International Organizations and third States in and in relation to the Occupied Palestinian Territory***, *Advisory Opinion of 22 October 2025*, paras.128-133, paras. 134-138.

[148] International Covenant on Economic, Social and Cultural Rights, 16 December 1966, Article 12 ; UN Committee on Economic, Social and Cultural Rights, ***General comment no. 14 (2000), The right to the highest attainable standard of health (article 12 of the International Covenant on Economic, Social and Cultural Rights)*** (11 August 2000); Convention on the Rights of the Child, 20 November 1989, Article 24.

“patients, companions, and health care workers all require permits to reach major health facilities in east Jerusalem, as well as to access referral care in Israeli hospitals”.[149]

In 2022, by the time of their scheduled healthcare appointments, 15 percent of patient permit applications were not approved and 20 percent of permit applications for companions were not approved.[150] Since 2023 the number of medical permits granted for access to medical care outside the West Bank has “sharply declined”.[151] By the end of 2025, 36 percent of patient permit applications were either pending or denied, and 40 percent of companion permits were pending or denied.[152]

Ambulances from the West Bank are also not permitted to enter into Jerusalem, and instead must be met by an ambulance with Israeli registration plates at the checkpoint into Jerusalem, where the patient is then exchanged from one into the other. Ambulance crews are required to call the hospital security in advance of the ambulance transfer, providing details of the ambulance vehicle licence, details of the staff and patient, and whether the patient has a West Bank or Jerusalem ID.[153] In 2022, UN OCHA recorded that “93% of ambulance transfers to East Jerusalem were delayed due to the ‘back-to-back’ procedure, where patients are transferred from a Palestinian to an Israeli-licensed ambulance at checkpoints due to restrictions imposed by Israeli authorities”.[154] Between 2019 and 2021, the Palestinian Red Crescent Society (PCRS) recorded 3,488 back-to-back ambulance patient transfers out of its 3758 journeys — only 7 percent of patients could receive direct access to Jerusalem.[155]

One cancer patient that Ekō interviewed said she used the Al Munasseq Application to obtain permits for travel to Jerusalem for cancer treatment. Although her treatment sessions lasted only around ten minutes, reaching the hospital involved a long daily journey by bus, checkpoint crossings, searches and biometric checks. After October 2023, patients were required to leave the bus at Qalandiya checkpoint and continue on foot, making the journey especially difficult for those who were ill or had limited mobility. She explained, “Although my treatment itself did not exceed ten minutes, I would leave my city at six in the morning and return in the evening, which was extremely exhausting for me.” She was scheduled to undergo 16 radiotherapy sessions but became so fatigued that she completed only half before arranging private transport at considerable expense.

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[149] WHO, *Right to Health Barriers to health and attacks on health care in the occupied Palestinian territory, 2019 to 2021* (2023), https://applications.emro.who.int/docs/9789292740887-eng.pdf, p. 55.
[150] UN OCHA, Fact Sheet: Movement and Access in the West Bank, August 2023 (25 August 2023), https://www.ochaopt.org/2023-movement.
[151] UNGA, *Report of the Special Rapporteur on the situation of human rights in the Palestinian territories occupied since 1967, Francesca Albanese, Genocide as colonial erasure*, A/79/384 (1 October 2024), https://docs.un.org/en/A/79/384, para. 31.
[152] WHO, West Bank Health Access, (1 January 2025 - 31 December 2025), https://www.emro.who.int/images/stories/palestine/WB_Health_access_1Jan-31_DEC_25final.pdf.
[153] WHO, *Right to Health Barriers to health and attacks on health care in the occupied Palestinian territory, 2019 to 2021* (2023), https://applications.emro.who.int/docs/9789292740887-eng.pdf, p. 54.
[154] UN OCHA, *Fact Sheet: Movement and Access in the West Bank* (August 2023), https://www.un.org/unispal/wp-content/uploads/2023/08/OCHAFACTSHEET_250823.pdf.
[155] WHO, Right to Health: Barriers to Health and Attacks on Health Care in the Occupied Palestinian Territory, 2019 to 2021 (2023), https://www.emro.who.int/opt/information-resources/right-to-health.html.

The systematic delays further result in patients missing crucial hospital appointments including for terminal illnesses. In particular, "cancer patients referred for chemotherapy and/or radiotherapy from 2015 to 2017 were 1.45 times less likely to survive if initially delayed or denied permits compared to patients initially approved".[156] Mahmoud al-Kurd, a 45-year-old cancer patient, submitted five permit applications to the Israeli authorities to travel to East Jerusalem for chemotherapy, but "each time Israel either rejected the application or said it was "still under review" when the scheduled appointment drew near". Only after human rights organisations intervened on the sixth application did Israeli authorities grant approval, however 24-hours after arriving at the hospital, Mahmoud died.[157]

Another woman we interviewed said she began using the Al Munasseq Application around 2020 to track permit applications to accompany her mother, who was referred from Gaza to the West Bank for cancer treatment. After the Civil Affairs office advised her to use the app, she relied on it to monitor whether her patient companion permit was "under review," "rejected," or "approved." Her applications were repeatedly rejected, preventing her from accompanying her mother despite her mother's need for assistance. She described the emotional toll: "Not being granted a permit to accompany my mother had a significant emotional impact on me, especially since she is a cancer patient and had no one else to accompany her." She added, "It was extremely distressing for me when she had to travel alone without a companion. Until today, this continues to affect me deeply."

At times, such denials can result in the patient also not being able to travel for treatment for extended times, as was the case in 2023 for 8-year old Bilal al-Masharawi, who needed specialist treatment for a respiratory disease and chronic pneumonia, but his parents were rejected for his accompanying permits.[158] One other Palestinian child from Gaza, Aisha al-Lulu, aged 5, was accompanied by a stranger approved by Israeli authorities, as her mother is an Egyptian national living in Gaza, who did not have an Israeli-issued ID card required for the permit application, and could therefore not accompany her child to Jerusalem. In the hospital, Aisha repeatedly called out for her mother. She was returned to Gaza unconscious and died a week later[159]

To this day, there is no functioning permit regime for Palestinian patient transfers from the Gaza Strip to occupied East Jerusalem or the West Bank, nor Israel — and all prior medical permit

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[156] WHO, *Right to Health Barriers to health and attacks on health care in the occupied Palestinian territory, 2019 to 2021* (2023), https://applications.emro.who.int/docs/9789292740887-eng.pdf, p. 38.

[157] B'Tselem, *Mahmoud al-Kurd (45) from Deir al-Balah had metastatic cancer and waited about five months for a permit to enter the West Bank for radiotherapy – which Israel only issued after he was beyond help* (15 January 2023), https://www.btselem.org/gaza_strip/20230115_gaza_cancer_patient_mahmoud_al_kurd_waited_five_months_for_a_permit_issued_after_he_was_beyond_help#:~:text=Mahmoud%20al%2DKurd%2C%20from%20Deir,and%20'Obaydah%20(7).

[158] B'Tselem, *Israel preventing 8-year-old Palestinian from leaving Gaza for medical treatment* (28 March 2023), https://www.btselem.org/gaza_strip/20230328_israel_preventing_8_year_old_palestinian_from_leaving_gaza_for_medical_treatment; Gisha, *This Week in Court: Who will accompany the child?* (4 April 2023), https://gisha.org/en/this-week-in-court-who-will-accompany-the-child/.

[159] "Gaza parents struggle to join kids for treatment in Israel", *The Times of Israel* (12 June 2019), https://www.timesofisrael.com/gaza-parents-struggle-to-join-kids-for-treatment-in-israel/.

procedures have ended.[160] Israel is only facilitating minimal medical transfers outside of Gaza to third countries — as of February 2026, only 260 patients out of 18,500 requiring treatment that is not available in Gaza exited Gaza, since the Rafah crossing re-opened[161] — while at least 1,268 patients, including children, died from their illnesses in Gaza while waiting for permission to be medically evacuated.[162]

Right to work

The physical trajectory of the wall running at 712 kilometres, 85 percent of which is located within the West Bank, presents one of the biggest obstacles to Palestinian workers, along with its gates, checkpoints and the discriminatory permit regime. The Israeli military employs force and lethal force at the checkpoints, with many incidents of killings documented where Palestinians attempt to breach the movement restrictions.[163] Since 7 October 2023, Israel has almost entirely prevented Palestinian workers from accessing the Palestinian capital, Jerusalem and Israel, including by restricting permits to 800 nationally recruited Palestinian humanitarian workers.[164] Farmers are also denied access to their vital agricultural lands, cut off by the wall and its closed gates, which are shut nearly all year round.[165]

Following Israel's offensive, deemed a genocide,[166] on the Gaza Strip in late 2023, restrictions on Palestinian movement across the OPT intensified.[167] Of the 170,000 Palestinians in the West

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[160] See further, the exception (after a prolonged legal battle) confirming the rule: Gisha, *For the first time since the beginning of the war: A cancer patient from the Gaza Strip was permitted to travel for medical treatment in the West Bank* (12 January 2026), https://gisha.org/en/cancer-patient-from-gaza-permitted-travel-for-medical-treatment-in-west-bank-eng/.

[161] UN, The Question of Palestine, *Limited medical evacuations from Gaza continue – OCHA press release* (17 February 2026), https://www.un.org/unispal/document/limited-medical-evacuations-from-gaza-continue-ocha-press-release/

[162] "Gaza child dies waiting for Israeli permission to leave for treatment", *Al-Jazeera* (23 February 2026), https://www.aljazeera.com/news/2026/2/23/gaza-child-dies-waiting-for-israeli-permission-to-leave-for-treatment; Save the Children, *Under the limited opening of Rafah border, urgent medical evacuations would take over a year* (2 February 2026), https://www.savethechildren.net/news/news-quote-under-limited-opening-rafah-border-urgent-medical-evacuations-would-take-over-year.

[163] Al-Haq, *Palestinian killed by Israeli Soldiers at al-Za'yyam Checkpoint* (2 August 2012), https://www.alhaq.org/monitoring-documentation/6844.html; UN OCHA, *Movement and Access in the West Bank | April 2026* (23 April 2026), https://www.ochaopt.org/content/movement-and-access-west-bank-april-2026.

[164] UN OCHA, *Movement and Access in the West Bank | April 2026* (23 April 2026), https://www.ochaopt.org/content/movement-and-access-west-bank-april-2026.

[165] UN OCHA, *Movement and Access in the West Bank | April 2026* (23 April 2026), https://www.ochaopt.org/content/movement-and-access-west-bank-april-2026.

[166] UNGA, *Report of the Independent International Commission of Inquiry on the Occupied Palestinian Territory, including East Jerusalem, and Israel*, A/80/337 (14 August 2025), https://www.undocs.org/A/80/337; UN HRC, *Legal analysis of the conduct of Israel in Gaza pursuant to the Convention on the Prevention and Punishment of the Crime of Genocide: Conference room paper of the Independent International Commission of Inquiry on the Occupied Palestinian Territory, including East Jerusalem, and Israel* (16 September 2025), A/HRC/60/CRP.3 (16 September 2025), https://www.ohchr.org/sites/default/files/documents/hrbodies/hrcouncil/sessions-regular/session60/advance-version/a-hrc-60-crp-3.pdf.

[167] International Labour Conference, *The situation of workers of the occupied Arab territories Report of the Director-General Appendix,* (2025), para. 56, https://www.un.org/unispal/document/the-situation-of-workers-of-the-occupied-arab-territories-report-of-the-ilo-director-general-appendix/.

Bank who had worked in Israel or the Israeli settlements prior to 7 October 2023, some 90 percent of these workers lost their jobs, while an additional 67,000 workers in the West Bank were prevented from accessing their workplaces by physical movement restrictions and closures after 7 October 2023.[168] By July 2024, over 200,000 jobs had been lost. Israel has often completely closed off access to Palestinian workers from the West Bank and Gaza to enter Israel for work.[169] The further imposition of 925 Israeli-installed obstacles, including checkpoints, gates, roadblocks, barriers and trenches, which physically impede the movement of 3.4 million Palestinians,[170] entailed many Palestinian workers could only access their work on foot or over fields making access to work impossible for some, and particularly impacting the access to work for Palestinian women workers.[171]

On 11 October 2023, COGAT revoked all Al Munasseq work permits from Palestinian workers in Gaza, stipulating that the permits "will not be reinstated,"[172] affecting around 18,500 Palestinian workers in Gaza.[173] As outlined above,"Gaza workers discovered that the Israeli work permits lawfully in their possession had been revoked, and that there was no record of their permits on COGAT's Al Munasseq app".[174]

Ekō interviewed a man from Gaza who described his experience working inside Israel: "Obtaining a work permit was extremely important to me and considered a dream that everyone hoped to achieve. Getting a permit and a job opportunity inside Israel meant that you had begun securing your life and your children's future." He described the lack of local employment opportunities and the importance of earning enough to meet basic needs and save for the future: "There are almost no job opportunities for young people in Gaza, and if there are any, the income is very low compared to the many life obligations and needs. While the income from working inside Israel is very good, helps me meet all the necessary needs, and put aside some money for the future."

Although his initial permit application was approved and he was able to work inside Israel, subsequent applications were rejected without explanation. As he stated, "When my permit was about to expire I applied again for a new permit, but my application was rejected. I did not know

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[168] UN, The Question of Palestine, *Report on UNCTAD assistance to the Palestinian people – Developments in the economy of the Occupied Palestinian Territory* (TD/B/71/3) (23 July 2024), https://www.un.org/unispal/document/report-on-unctad-assistance-23jul24/.
[169] UN OCHA, *Protection of Civilians – Weekly Briefing Notes* (10-16 May 2006), https://www.ochaopt.org/sites/default/files/WBN155.pdf.
[170] UN OCHA, *Movement and Access in the West Bank | April 2026* (23 April 2026), https://www.ochaopt.org/content/movement-and-access-west-bank-april-2026.
[171] International Labour Conference, *The situation of workers of the occupied Arab territories Report of the Director-General Appendix*, (2025), https://www.un.org/unispal/document/the-situation-of-workers-of-the-occupied-arab-territories-report-of-the-ilo-director-general-appendix/, para. 56.
[172] Gisha, *Israel refuses to reveal information about thousands of Gaza residents being held in Israeli detention facilities* (19 October 2023), https://gisha.org/en/illegally-detained-workers-october-2023-en/.
[173] Human Rights Watch, *Israel: Gaza Workers Held Incommunicado for Weeks* (3 January 2024), https://www.hrw.org/news/2024/01/03/israel-gaza-workers-held-incommunicado-weeks.
[174] Gisha, *Israel refuses to reveal information about thousands of Gaza residents being held in Israeli detention facilities* (19 October 2023), https://gisha.org/en/illegally-detained-workers-october-2023-en/.

the reason because Al Munasseq does not provide a way to see the reason for rejection." He later received notification through the app that he had a security ban. He hired a lawyer to challenge it and to establish the reason, but the process stalled following the war on Gaza.

Right to family life

The right to family life is protected under international human rights law, and no one may be subjected to arbitrary or unlawful interference with their family life.[175] Israel is therefore obliged to respect and ensure the right to family life of the Palestinian population of the OPT, and must do so in conformity with its obligations as an occupying power,[176] which includes its obligation not to forcibly transfer protected persons out of the occupied territory, and not to create a coercive environment in order to do so.

It should be noted, however, that Israel has since 1967 maintained a regime where the obtainment of family unification for Palestinians located in different parts of the OPT, or both in the OPT but with family outside of the OPT is not treated as a right. The separation of family members, including of spouses, or parents from children, is also — in and of itself — not treated as a humanitarian consideration for the purpose of Israel's application of any "humanitarian exception" to its general movement restriction.[177] As a result, Palestinian families are not allowed free movement within the OPT — and may remain separated.

In 2024, the ICJ found that "Israel's residence permit policy results in the differential treatment of Palestinians in relation to their right to family life, as guaranteed under Article 10 of the ICESCR and Article 17 of the ICCPR",[178] found that this policy "is not justified, because it does not serve a legitimate public aim,"[179] and that "Israel's residence permit policy amounts to prohibited discrimination under Articles 2, paragraph 2, 23 and 26 of the ICCPR, and Articles 2, paragraph 2, and 10, paragraph 1, of the ICESCR".[180] *In sum*, Israel's maintenance of discriminatory laws on family unification specifically targets Palestinian citizens of Israel along with Palestinians from

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[175] International Covenant on Civil and Political Rights, 16 December 1966, Art. 17, Art. 23 and Art. 24; International Covenant on Economic, Social and Cultural Rights, 16 December 1966, Art. 10; Convention on the Rights of the Child, 20 November 1989, Art. 10, Art. 16 and Art. 18.

[176] International Covenant on Economic, Social and Cultural Rights, 16 December 1966, Article 13; Convention on the Rights of the Child, Article 24.

[177] See *e.g.* The State of Israel, Ministry of Defence, *Procedure for handling Applications by Gaza Strip Residents for settlement in the Judea and Samaria Area* (8 March 2009), https://hamoked.org.il/files/2010/9029.pdf [Hebrew], unofficial English translation available via: https://hamoked.org/files/2010/9029_eng.pdf: "The Deputy Minister clarified that a family relationship, in and of itself, does not qualify as a humanitarian reason that would justify settlement by Gaza residents in the Judea and Samaria Area [West Bank]." See also COGAT, *Procedure for Entry And Residence of Foreigners in the Judea and Samaria Area* (21 December 2022), https://www.gov.il/BlobFolder/policy/judeaentry2022/en/%D7%A0%D7%95%D7%94%D7%9C%20%D7%9B%D7%A0%D7%99%D7%A1%D7%AA%20%D7%96%D7%A8%D7%99%D7%9D%20%D7%91%D7%90%D7%A0%D7%92%D7%9C%D7%99%D7%AA-%20%D7%AA%D7%A8%D7%92%D7%95%D7%9D%20%D7%9E%D7%A2%D7%95%D7%93%D7%9B%D7%9F%20%D7%93%D7%A6%D7%9E%D7%91%D7%A8%202022%20(2).pdf, p. 40: "However, in this context the fact that the spouses are married, or are parents of children, shall not in itself be treated as a humanitarian consideration."

[178] *Palestine Advisory Opinion*, para. 195.

[179] *Palestine Advisory Opinion*, para. 196.

[180] *Palestine Advisory Opinion*, para. 197.

Gaza and the West Bank, “greatly affecting family ties and the right to marriage and choice of spouse”.[181]

One woman we interviewed in Gaza began using Al Munasseq around six years ago to track permit applications that would allow her to visit her husband, who has lived in the West Bank since 2006. She desperately needed to visit him while raising their children alone. Despite her concerns about privacy, she felt she had no alternative to using the Application. As she explained, “When I was first asked to download and use the application, I was afraid because it was widely believed that the application was compromised, that Israel used it for surveillance, and that personal photos, files, and private information could be accessed through it.” Nevertheless, “There is no alternative to Al Munasseq application; it is the only tool through which one can track permit applications, crossing movements, and workers entry.”

Her first application for a permit to visit her husband was rejected, and she was subsequently summoned for an interview with an Israeli interrogator who questioned her about phone numbers and vehicle registration numbers belonging to her brother-in-law and other individuals. She explained, “I told him that I did not know the answers, which was true, but he seemed to think that I was lying and refusing to answer his questions.” The ban continued for several years, leaving her unable to visit her husband during that period. As she recalled, “The ban continued for several years, until there was talk of ‘facilitations’ and that women were being allowed to apply for work permits inside Israel.” She eventually obtained a work permit and, around four months later, a merchant’s wife permit which allowed her to visit her husband and his relatives.

Freedom of religion

Israel further applies separate legal systems to Palestinians and Israeli settlers in the OPT, “which in practice results in the differentiated treatment on the basis of, inter alia, race, religion or ethnic origin”.[182] For example, Israel persecutes the Palestinian group, by facilitating the access of Israeli settlers into key Palestinian religious sites,[183] destroying Palestinian religious and cultural sites in patterns of attacks carried out with an intent to destroy,[184] carries out arrests

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[181] *Concluding observations of the Committee on the Elimination of Racial Discrimination, Israel,* U.N. Doc. CERD/C/ISR/CO/14-16 (2012). para. 18.

[182] UN OHCHR, *Thematic Report Israel’s discriminatory administration of the occupied West Bank, including East Jerusalem* (7 January 2026), https://www.ohchr.org/sites/default/files/documents/countries/israel/20260105-thematic-report-israel-discrimin.pdf, para. 52.

[183] UN OHCHR, *Israel: UN expert condemns brutal attacks on Palestinians at Al-Aqsa Mosque* (6 April 2023), https://www.ohchr.org/en/press-releases/2023/04/israel-un-expert-condemns-brutal-attacks-palestinians-al-aqsa-mosque.

[184] UNGA, *Report of the Independent International Commission of Inquiry on the Occupied Palestinian Territory, including East Jerusalem, and Israel,* A/HRC/59/26 (6 May 2024), https://docs.un.org/en/A/HRC/59/26 p. 9; UNGA, *Report of the Independent International Commission of Inquiry on the Occupied Palestinian Territory, including East Jerusalem, and Israel, A/80/337* (4 August 2025), https://docs.un.org/en/A/80/337, para. 21.

and sweeping movement restrictions on Palestinian access to their holy sites,[185] violently attacks Palestinians trying to access religious sites,[186] while shielding Israelis who destroy religious sites and carry out attacks from accountability.[187] At key religious times during the year, such as Ramadan, Israel punitively restricts access to holy sites in the State of Palestine's capital city. For example, on the first day of Ramadan in 2025, Israel closed the Tayaseer checkpoint, "severely hamper[ing]" the movement of 60,000 Palestinians and "prevented thousands of Palestinian worshippers from reaching holy sites".[188]

Israel's application of its general movement restrictions and associated permit regime further prevents Palestinians, including Palestinians from Gaza, from *inter alia* visiting their holy sites, and serves to isolate Jerusalem from the rest of the West Bank, "transforming its geography, economy, and social life".[189] The Al Munasseq Application is used in order to enforce the respective movement regime and associated permit regime, including in relation to religious permits.

Gender-based discrimination

In 2024, the ICJ already observed that "differential treatment of Palestinians can give rise to discrimination", but that "[t]he Court is mindful that differential treatment might not be experienced by all members of the Palestinian group in the same way, and that some members of the group might be subjected to differential treatment on multiple grounds".[190] It further remarked that "an adverse effect of Israel's policy is experienced particularly by Palestinian women, who commonly depend on male spouses for their residence status."[191] Judge Charlesworth further elaborated in her declaration on this notion of intersectionality, emphasising that

"[t]his recognition that individual members of a group may experience discrimination in different ways and on multiple grounds is important. Palestinians as a group share an ethnicity, but they also have many different identities individually — for example, in terms of age, disability and gender",[192] and that: "United Nations bodies that monitor the implementation of treaties

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[185] UN OHCHR, *UN experts warn against the irreversible 'de-Palestinisation' of Jerusalem* (6 March 2026), https://www.ohchr.org/en/press-releases/2026/03/un-experts-warn-against-irreversible-de-palestinisation-jerusalem.
[186] UN OHCHR, *Israel: UN expert condemns brutal attacks on Palestinians at Al-Aqsa Mosque* (6 April 2023), https://www.ohchr.org/en/press-releases/2023/04/israel-un-expert-condemns-brutal-attacks-palestinians-al-aqsa-mosque.
[187] Adalah, *Gaza 2 Years On: Impunity Over Accountability Israel's unwillingness to investigate violations of international law in the Gaza Strip Issued 28 August 2016; Updated 14 March 2017* (14 March 2017), https://www.adalah.org/uploads/uploads/Report_Gaza_Obstacles_English_14Mar2017.pdf
[188] UN News, *Global Perspective Human Stories, Occupied Palestinian Territory: Israeli operations continue to have dire consequences* (7 March 2025), https://news.un.org/en/story/2025/03/1160926.
[189] UN OCHA, *Movement and Access in the West Bank | April 2026* (23 April 2026), https://www.ochaopt.org/content/movement-and-access-west-bank-april-2026.
[190] *Palestine Advisory Opinion,* para. 190.
[191] *Palestine Advisory Opinion,* para. 195.
[192] *Palestine Advisory Opinion, Declaration of Judge Charlesworth,* para. 2.

prohibiting discrimination on specific grounds have identified the limitations of focusing on a single ground of discrimination. For example, in its General Recommendation No. XXV on gender-related dimensions of racial discrimination, the Committee on the Elimination of Racial Discrimination has stated "that racial discrimination does not always affect women and men equally or in the same way. There are circumstances in which racial discrimination only or primarily affects women, or affects women in a different way, or to a different degree than men. Such racial discrimination will often escape detection if there is no explicit recognition or acknowledgement of the different life experiences of women and men, in areas of both public and private life".[193]

The requirement to use Al Munasseq has had specifically gendered effects on women in the OPT, who expressed specific concerns regarding privacy and exploitation through the Application.

One woman told us: "When I was first asked to download and use the application, I was afraid because it was widely believed that the application was compromised, that Israel used it for surveillance, and that personal photos, files, and private information could be accessed through it."

Another said: "If I were asked to download and use the application again, I would refuse. I have become afraid that using it could harm me, and I am now convinced that through this application, Israeli authorities can spy on me and my family."

"At the beginning, I had no concerns about using the application, especially since the Civil Administration recommended it. I did not realize it could pose a risk to my life and the lives of my children, or that harm could result from the simple information I entered when registering."

Women are also affected by movement restrictions as a whole, which combined with "ongoing operations by Israeli forces, record levels of settler violence… particularly in Jenin, Tulkarm, and Tubas governorates" also create "limited access to reproductive health services in the West Bank", affecting approximately 232,000 women and girls, including 14,800 pregnant women.[194]

Another woman Ekō interviewed told us: "We did not hesitate to use or download it, as not obtaining a permit would have been catastrophic for my health, given that cancer treatment is not available at all in the Gaza Strip." …

"As a result, I had to go for treatment alone once a month, and my psychological state was very poor. You can imagine, I was a woman, alone, exhausted and ill, forced to move and travel by myself even during treatment."

Also, the permit regime also discriminates against Palestinian men, who are treated as a heightened security risk. In April 2023, Gaza men aged 18 to 40 had the lowest approval rate of

[193] *Palestine Advisory Opinion, Declaration of Judge Charlesworth,* para. 3.

any group of patients seeking permits to leave for medical treatment, at 65%, compared with 81% for women patients overall.[195]

Self-determination

In relation to movement restrictions, every aspect of Palestinian life is impacted by discriminatory movement restrictions which impede "access to public and private land, affecting the enjoyment of all their human rights, including their rights to food, water, health, adequate housing, education, family life, participation in cultural life, and self-determination".[196] The confinement of the entire Palestinian population is described by the UN Special Rapporteur on the situation of human rights in the Palestinian territories occupied since 1967 as a "larger carceral landscape, extending beyond prison", a phenomenon which is epitomised by "stifling Palestinian movement and freedoms, while furthering fragmentation, surveillance and segregation of their living space" to facilitate the expansion of settlements, creating a "suffocating environment".[197]

Al Munasseq appears, with all the privacy infringements it entails, to function not only to enforce this movement regime, but also the larger landscape of surveillance and control over both public and intimate spheres of Palestinian life. The 2025 report of the UN Secretary General warned that, "[t]he denial of Palestinians' right to self-determination continues to be perpetrated through an increasingly institutionalized and entrenched regime of systemic discrimination, violence and oppression by Israel" violating "a wide range of human rights, including those set out in article 3 of the International Convention on the Elimination of All Forms of Racial Discrimination, to which Israel is a State Party".[198]

Conclusion

Israel's illegal occupation and system of apartheid are built with concrete walls, checkpoints, gates and segregated roads. They are also built in code, and in data centers around the world. For Palestinians in the occupied Palestinian territory, the permits that govern their passage through their own land now sit in an application on their phones. With Al Munasseq, domination and control no longer end at the checkpoint. They travel home with Palestinians, tracking them

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[194] UN OCHA, *Humanitarian Situation Update #354 | West Bank* (22 January 2026), https://www.ochaopt.org/content/humanitarian-situation-update-354-west-bank.

[195] WHO, Health Access Barriers for Patients in the Occupied Palestinian Territory, April 2023 (29 May 2023), https://www.un.org/unispal/wp-content/uploads/2023/05/WHOMOACCESSRPT_290523.pdf.

[196] UN OHCHR, *Thematic Report Israel's discriminatory administration of the occupied West Bank, including East Jerusalem,* (7 January 2026), https://www.ohchr.org/sites/default/files/documents/countries/israel/20260105-thematic-report-israel-discrimin.pdf, para. 29.

[197] UN HRC, *Report of the Special Rapporteur on the situation of human rights in the Palestinian territories occupied since 1967, Francesca Albanese*, A/HRC/53/59 (9 June 2023), https://www.ohchr.org/sites/default/files/documents/hrbodies/hrcouncil/sessions-regular/session53/advance-versions/A_HRC_53_59_AdvanceUneditedVersion.pdf, para. 13.

[198] UNGA, *Israeli settlements in the Occupied Palestinian Territory, including East Jerusalem, and the Occupied Syrian Golan Report of the Secretary-General*, A/80/399, (25 September 2025), https://docs.un.org/en/A/80/399, para.72.

through some of the most invasive permissions a phone can grant. With more than a million downloads, Palestinians in the OPT have no choice but to install, carry and engage with the very instrument of their own oppression.

And behind it stands Microsoft Azure, which keeps the application running. Microsoft tells investors and the public it respects human rights.[199] Millions of Palestinians are living under a system of domination and oppression that Microsoft's technology helps to run.

In doing so, Microsoft serves as a technological partner for a decades-long illegal occupation and a system of apartheid that international courts, UN bodies and human rights organisations have documented in detail. Microsoft has shown it can act when the evidence becomes impossible to ignore.[200] On Al Munasseq, the evidence is now before it, before its regulator and before the government that oversees it.

There is no room left for inaction. Apartheid is a crime against humanity and companies that provide the means for its implementation, and authorities that fail to act on credible evidence of it, could bear responsibility for what follows. The recommendations below set out what each must do.

Road to accountability

GDPR violations and the complaint to Ireland's Data Protection Commission

Because key components of Al Munasseq are hosted in Microsoft's Irish data centres[201], the processing of Palestinians' personal data through the Application falls under the EU's General Data Protection Regulation (GDPR) and the supervision of Ireland's Data Protection Commission (DPC). On 4 December 2025, the Irish Council for Civil Liberties, in partnership with Ekō, filed a complaint with the DPC on the basis of whistleblower evidence. Nearly nine months later, the DPC responded with only basic questions. The GDPR gives the DPC the power to investigate and, where processing is unlawful, to order it to be limited or stopped altogether. As of the time of writing, it has not yet used those powers. Given what is at stake for Palestinians, it remains unclear whether the complaint is being handled with the urgency it demands.

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[199] Microsoft, Global Human Rights Statement, https://www.microsoft.com/en-us/corporate-responsibility/human-rights-statement.

[200] Israel/IOPT: Microsoft's move to block Israeli military unit's access to its mass surveillance technology is a moment for corporate reckoning, Amnesty International https://www.amnesty.org/en/latest/news/2025/09/microsoft-block-israel-military-unit-from-using-its-technology/

201 Complaint Against Microsoft Ireland Operations Limited's Unlawful Processing in Support of Unlawful Israeli Activities https://www.iccl.ie/wp-content/uploads/2025/12/REDACTED-ICCL-GDPR-DPC-complaint-Microsoft.pdf

Shareholder and investor engagement

For more than one year, Microsoft's own investors have pressed the company to strengthen its human rights due diligence. In 2025, Proposal 8 which was co-filed by a record 58 investors won 26% per cent of the vote,[202] an almost unheard of level of support for a first time filing. This proposal has been re-filed and investors who hold Microsoft shares are calling on the company to review its human rights due diligence processes as they are exposed to the legal, reputational and operational risks of the company's role in facilitating Israel's occupation and system of apartheid. Investors have both the standing and the responsibility to demand change.

Alongside its partners at Azzad Asset Management, Ekō has also re-filed its shareholder proposal calling for a report on data operations in human rights hotspots[203] which received 27% of the investor vote in 2025.[204] The resolution addresses a broad investor concern: how Microsoft protects people and manages risk when it builds and operates cloud infrastructure in countries where surveillance and restrictions on expression can expose individuals to persecution and other severe human rights violations. Its scope encompasses countries of significant human rights concern generally, including situations outside armed conflict. Saudi Arabia, the UAE, and Israel illustrate the risks the proposal seeks to address. The stakes include surveillance of dissidents, imprisonment for peaceful expression, and interference with freedom of movement and access to essential services.

Investors need the Board report to show how these risks change business decisions and identify gaps where Microsoft's risk mitigation systems can be improved in practice. The principal asks are:

- Disclose the principal country and use-related risks identified before market entry, datacenter siting, or expansion, including government access to data, repression of expression, surveillance, and severe conflict-related harms. Explain how those findings affect data location, services offered, customer eligibility, contracts, and decisions to restrict, suspend, or exit.
- Show how safeguards are tested and reassessed as laws, governments, conflicts, customers, technologies, and uses change. Provide anonymized examples of consequential decisions, evidence of effectiveness, and controls against circumvention through related accounts or services.

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202 Microsoft Form 8-K https://www.sec.gov/Archives/edgar/data/789019/000119312525311196/d34077d8k.htm;

Filing: Human rights proposals win more than 25% of votes at Microsoft shareholder meeting

https://www.geekwire.com/2025/filing-human-rights-proposals-win-more-than-25-of-votes-at-microsoft-shareholder-meeting/

203 Microsoft 2026 Proxy Statement

https://www.sec.gov/Archives/edgar/data/789019/000119312526427849/d61756ddef14a.htm

204 Microsoft Corporation, Form 8-K, Current Report: Submission of Matters to a Vote of Security Holders (filed 8 December 2025, reporting the 2025 Annual Shareholders Meeting of 5 December 2025),

https://www.sec.gov/Archives/edgar/data/789019/000119312525311196/d34077d8k.htm

- Explain Board oversight, safe engagement with affected rights-holders, regulatory cooperation, and appropriate remedy where Microsoft caused or contributed to harm. Publish the report within the timeframe requested by the resolution, at reasonable cost and omitting confidential and proprietary information.

Criminal liability

Apartheid and persecution are crimes against humanity. Companies, and the individuals who run them, can face legal consequences where they knowingly provide the means for such crimes. In several jurisdictions, prosecutors must open investigations on the basis of credible evidence submitted by civil society, without waiting for action at the international level.

Appendix

Technical analysis of the Al Munasseq's permissions, conducted by cybersecurity group IronSky (Pty) Ltd and reviewed by Tech for Palestine.

TECHNICAL AND RISK EVALUATION

Al-Munassaq Permissions

A direct evaluation of the application's Android permissions and the risks they create

Application	Al Munasiq, package com.evendigitals.elmunasek
Subject	Android permission manifest, 27 declared permissions
Approach	Capability assessment, attack-chain analysis, and risk weighted to the real device population
Prepared	23 July 2026
Status	Draft for internal review and editing

This evaluation reads the permissions directly. It distinguishes what a permission makes possible, i.e. its capability, from what the application has been observed to do, its behaviour.
A permission manifest establishes the first and not the second, so a capability that has no legitimate purpose is treated as an anomaly that demands explanation rather than as proof of wrongdoing.
The findings are then weighted for the context in which the application is actually used: a population that has little choice about installing it, and an operator with the means to act on what it collects, on a fleet of older, unpatched Android phones on which many of the platform's protections are absent.

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Executive summary

Assessment. The application requests a set of permissions that goes well beyond what a permit-checking tool needs. It carries commercial advertising and analytics infrastructure that has no administrative purpose, it is built to run continuously and to restart whenever the phone is switched on, it can determine the user's location by two independent methods. It holds several capabilities that are difficult to justify in this context at all, including silent reading of identity-document chips and detection of the user's own screenshots.
Individually these are capabilities rather than proven conduct. Assembled, and placed on the old, unpatched devices common among the affected users, they combine into coherent chains for surveillance, coercion, and remote compromise, and the practical risk is **HIGH**.

What stands out most

- **Commercial tracking with no reason to be present.** Four permissions (`AD_ID`, `ACCESS_ADSERVICES_AD_ID`, `ACCESS_ADSERVICES_ATTRIBUTION`, `BIND_GET_INSTALL_REFERRER_SERVICE`) exist only to support advertising and install-campaign tracking. A government permit application has nothing to advertise, so their presence points to embedded third-party advertising or analytics code and a route by which user data can leave the device to commercial parties. This is the single most glaring concern.
- **A device that never stops working for the app.** Auto-start on boot, a foreground service, and a wake lock together keep the application active around the clock, whether or not the user ever opens it.
- **Capabilities that fit surveillance more than administration.** Precise location paired with Wi-Fi based positioning, broad access to stored files, silent NFC reading of identity documents, and screenshot detection.
- **The device context sharpens the danger.** On the older Android versions common in Gaza, several protections that would blunt these permissions are simply not present, so the risk resolves toward the more dangerous case rather than the safer one.

Where the evidence stops

Permissions show capability, not conduct. This evaluation does not claim the application is currently exfiltrating data or delivering spyware. It shows that the capability to do so is present and, in several cases, unexplained, and it sets out what observation of a running build would be needed to establish intent.

1 Scope and approach

This document evaluates the twenty-seven Android permissions declared by the application. For each permission it states plainly what the permission grants, whether that grant has a plausible administrative justification for a permit-checking application, and how confident that judgement is on the evidence of the manifest alone. It then groups the permissions into the capabilities they combine to create, traces those capabilities into concrete Compromise chains, and weighs the result against the devices the application actually runs on.

Two principles run through the evaluation

- **Capability is not conduct.** A permission describes what the application is able to do. It does not, by itself, show what the application does with that ability or why the ability was requested. A permission with no legitimate use is therefore flagged as an anomaly to be explained, and the burden of that explanation sits with whoever built and deployed the application.
- **Danger depends on the Android version.** Most of the platform protections that would contain these permissions were introduced in specific Android releases. The same permission can be harmless on a current phone and dangerous on an older one, so every finding is read against both a modern device and the older devices common in the affected population.

The manifest evaluated here was obtained from a build distributed through the APK Pure platform. A build obtained outside the official store should be confirmed against the store release before any finding is treated as final, because a sideloaded package can differ from the published one.

2 Permission-by-permission evaluation

Verdict key: **Justified**, a plausible purpose exists. **Questionable**, plausible but broad or sensitive. **Unjustified**, no plausible purpose for this application.

#	Permission	What it grants	Verdict	Conf.	Notes
1	`INTERNET`	Network access	**Justified**	High	Core requirement for any connected app.
2	`ACCESS_NETWORK_STATE`	Connectivity type and state	**Justified**	High	Standard. Movement inference from this alone is weak.
3	`POST_NOTIFICATIONS`	Show notifications	**Justified**	High	Standard on Android 13 and above.
4	`VIBRATE`	Haptics	**Justified**	High	Benign.
5	`USE_BIOMETRIC`	Biometric authentication	**Justified**	High	Normal for login. Sensitivity is inherent, not anomalous.
6	`USE_FINGERPRINT`	Legacy fingerprint	**Justified**	High	Standard backward compatibility with item 5.
7	`c2dm.RECEIVE (FCM)`	Push messaging	**Justified**	High	Common to a large share of apps. See chain 4 and section 6.
8	`DYNAMIC_RECEIVER_NOT_EXPORTED`	Restrict internal broadcasts	**Justified**	High	Security housekeeping, standard practice.
9	`CAMERA`	Camera	**Justified**	Med	Matches the stated document-scanning use. Background capture is blocked

#	Permission	What it grants	Verdict	Conf.	Notes
					from Android 9 on, so it matters mainly on the oldest devices.
10	ACCESS_FINE_LOCATION	Precise GPS	**Justified**	Med	Justified by stated use but the most operationally sensitive permission, given the 2024 return-verification procedure. The concern is the use, not the presence.
11	SCHEDULE_EXACT_ALARM	Exact-time operations	**Questionable**	Med	Plausible for reminders, and part of the persistence cluster.
12	WAKE_LOCK	Keep the CPU awake	**Questionable**	Med	Common individually, part of the persistence cluster.
13	FOREGROUND_SERVICE	Long-running service	**Questionable**	Med	Common individually, part of the persistence cluster.
14	RECEIVE_BOOT_COMPLETED	Auto-start on boot	**Questionable**	Med	Common individually, part of the persistence cluster.
15	WRITE_EXTERNAL_STORAGE	Write shared storage	**Questionable**	Med	Needed to save scans, but broad. Grants effective read on Android 9 and below.
16	READ_EXTERNAL_STORAGE	Read shared storage	**Questionable**	Med	Broad access to other apps' files on Android 9 and below. Central to the HaMoked petition and still present.
17	ACCESS_WIFI_STATE	Wi-Fi SSID and BSSID data	**Questionable**	Med-High	A second, GPS-independent way to fix location through Wi-Fi fingerprinting.
18	ACCESS_NOTIFICATION_POLICY	Read and change Do Not Disturb	**Questionable**	Med	Can push messages past a silenced device.
19	DETECT_SCREEN_CAPTURE	Notify on screenshot	**Questionable**	Med	Tells the operator when a user documents the screen. Functions only on Android 14 and above. See chain 5.
20	DOWNLOAD_WITHOUT_NOTIFICATION	Suppress download notice	**Questionable**	Med	Weak on its own, since any networked app can fetch files quietly. Significant only as a link in chain 4.
21	deveventspermission (custom)	Unknown internal gate	**Questionable**	Low	Non-standard custom permission. Its purpose cannot be known without decompiling the app.
22	BROADCAST_CLOSE_SYSTEM_DIALOGS	Dismiss system dialogs	**Unjustified**	Med	Restricted from Android 12 on, but fully functional on the older devices common in this population. See chain 4.
23	NFC	Read and write NFC chips	**Unjustified**	Med-High	No stated purpose. Identity and permit cards can carry NFC chips, so this allows silent reading of them. See chain 3.
24	gms AD_ID	Advertising identifier	**Unjustified**	High	An advertising-industry tracking identifier with no

#	Permission	What it grants	Verdict	Conf.	Notes
					administrative or security purpose.
25	ACCESS_ADSERVICES_AD_ID	Ad identifier (Privacy Sandbox)	**Unjustified**	High	A second route to the advertising identifier. Functions only on Android 13 and above.
26	ACCESS_ADSERVICES_ATTRIBUTION	Ad attribution reporting	**Unjustified**	High	Advertising measurement with no permit-app purpose. Functions only on Android 13 and above.
27	BIND_GET_INSTALL_REFERRER_SERVICE	Install-campaign attribution	**Unjustified**	High	Marketing attribution. A government application runs no ad campaigns to attribute.

Overall count: **8 justified**, **11 questionable**, **7 to 8 unjustified** (item 22 sits on the boundary, since it is restricted on newer Android but active on older).

3 Capability clusters

The permissions matter less as a list than as combinations. Read together they form a small number of capabilities, each greater than the sum of its parts. The clusters below are the building blocks for the compromise chains in section 4.

A. Commercial advertising and analytics

`AD_ID`, `ACCESS_ADSERVICES_AD_ID`, `ACCESS_ADSERVICES_ATTRIBUTION`, and `BIND_GET_INSTALL_REFERRER_SERVICE` all serve commercial advertising and install attribution. None has any administrative use in a permit application. Their presence indicates advertising or analytics code embedded in the build, and with it a channel through which device and behavioural data can flow to third parties. The advertising identifier is requested through both the older Google Mobile Services route and the newer Privacy Sandbox route, so it can be obtained whatever version of Android the phone runs. This is the most glaring concern in the whole manifest. Appendix A sets out a dual-use reading of these four permissions, in which the same capability serves state surveillance rather than commercial advertising.

B. Continuous, self-restarting operation

`RECEIVE_BOOT_COMPLETED`, `FOREGROUND_SERVICE`, `WAKE_LOCK`, and `SCHEDULE_EXACT_ALARM` together make the application an always-on process. It starts the moment the phone is powered up, resists being closed by the system, keeps the processor awake while the screen is off, and can time its own actions precisely. On its own this pattern also appears in many ordinary applications, but it is the foundation on which every other capability here becomes continuous rather than occasional.

C. Dual-method location

`ACCESS_FINE_LOCATION` and `ACCESS_WIFI_STATE` give two independent ways to place the user. The first reads GPS to within a few metres. The second reads the names and hardware addresses of nearby Wi-Fi access points, which are geographically fixed and mapped in public databases, so they resolve to a location even indoors or with GPS switched off. Holding both means location tracking that is difficult for the user to defeat by disabling any single sensor.

D. Broad access to stored content

`READ_EXTERNAL_STORAGE` and `WRITE_EXTERNAL_STORAGE` reach the shared storage area where photographs, downloaded documents, and the media saved by other applications such as WhatsApp all live. On Android 9 and below this is close to unrestricted read access to the user's files. This pair sat at the centre of the HaMoked petition and remains in the manifest.

E. Remote reachability and delivery

`com.google.android.c2dm.permission.RECEIVE` keeps a live connection to Google's push infrastructure, so the device can be reached at any time. `DOWNLOAD_WITHOUT_NOTIFICATION` lets files arrive with no visible indicator, and `BROADCAST_CLOSE_SYSTEM_DIALOGS` can dismiss system prompts on older devices. Combined with the persistence cluster, this is a standing channel into the device plus the means to use it quietly.

F. Proximity and identity capture

NFC and CAMERA allow the application to read the chip inside an identity or permit card and to photograph the document and its holder. Where identity cards carry NFC chips, the read can happen silently, with the card simply brought near the phone.

G. Oversight of the user's own actions

DETECT_SCREEN_CAPTURE and ACCESS_NOTIFICATION_POLICY turn the application toward the user's behaviour: it can learn when the user screenshots its content, and it can override a silenced device to force its own messages through.

4 Potential chains to compromise

The clusters above are dangerous mainly in combination. The following chains describe, step by step, how the declared permissions could be used together to watch, pressure, or compromise a person who depends on the application. Each chain is a plausible path built from capabilities the manifest actually grants. None is a claim that the application performs these acts today; each is a demonstration of what the permission set assembles and why that matters for a user who cannot easily refuse to install it.

Compromise chain 1: Continuous pattern-of-life surveillance

Links in the chain: `RECEIVE_BOOT_COMPLETED` + `FOREGROUND_SERVICE` + `WAKE_LOCK` + `ACCESS_FINE_LOCATION` + `ACCESS_WIFI_STATE` + `SCHEDULE_EXACT_ALARM` + `INTERNET`

From the moment the phone is switched on the application starts on its own, without the user opening it. A foreground service and a wake lock keep it alive and processing while the screen is off and the owner believes the device is idle. In that state it can sample precise GPS position and, separately, the identifiers of the Wi-Fi access points around it, each of which resolves to a place. Exact alarms let the sampling be timed, and the standing internet connection lets it be delivered continuously.

Over days and weeks these samples become a detailed record of a life: the home address and the hours the person is there, the daily route, the checkpoints crossed and when, the workplaces and homes visited, and the people whose networks the phone repeatedly joins. Because two independent location methods are in play, switching off GPS does not end the tracking.

Coercion and threat. Tied to the return-verification procedure introduced in 2024, which already requires a permit holder to prove a return by submitting a timestamped photo with location active, a convenience feature becomes an instrument of compliance. Movement itself is made conditional on being tracked, and the operator holds a continuous positional history that can be used to locate a person, predict their movements, or apply pressure by threatening the permit on which their movement depends.

Compromise chain 2: Silent harvest of personal files

Links in the chain: `READ_EXTERNAL_STORAGE` + `WRITE_EXTERNAL_STORAGE` + `FOREGROUND_SERVICE` + `DOWNLOAD_WITHOUT_NOTIFICATION` + `INTERNET`

On the older Android versions common in this setting, read access to shared storage exposes the whole of it: photographs, voice notes and images saved by WhatsApp, downloaded PDFs, scanned documents, and files written by any other application. A persistent background process and an open network connection place the application in a position to enumerate, read, and send that content quietly, and the download permission removes the status-bar indicator that would normally accompany a transfer.

Nothing in this sequence requires the user to open the application or approve an action. The collection can run in the background while the phone appears idle.

Coercion and threat. A person's private messages, family photographs, political or religious material, and the documents of everyone they correspond with can be copied without prompt or trace. Material of this kind is the raw ingredient of blackmail. The mere knowledge that it could be held is a means of pressure in its own right, whether or not it is ever used, and it exposes not only the user but every contact whose files have passed through the phone.

Compromise chain 3: Identity capture at the point of contact

Links in the chain: `NFC` + `CAMERA` + `ACCESS_FINE_LOCATION` + `WRITE_EXTERNAL_STORAGE` + `INTERNET`

Palestinian identity documents and some permit cards carry NFC chips. The NFC permission lets the application read such a chip the instant a card is brought near the phone, silently, with no need for the holder to photograph or type anything. In the same moment the camera can capture the physical document and the person presenting it, storage can hold the images, precise location can record where the encounter took place, and the network connection can move the result off the device.

Each of these is an ordinary capability on its own. Their value is in the correlation: a single tap can bind together the chip contents, a facial image, a document scan, and an exact place and time.

Coercion and threat. In one interaction at a checkpoint or an office, the application can assemble a verified identity record that is richer and more authoritative than anything the holder knowingly provides. The reading happens through hardware contact that the holder cannot easily see or refuse, which makes it a quiet route to building a dossier on a person and on the documents they carry.

Compromise chain 4: Remote reach and interaction-free compromise

Links in the chain: `c2dm.RECEIVE (FCM)` + `WAKE_LOCK` + `FOREGROUND_SERVICE` + `DOWNLOAD_WITHOUT_NOTIFICATION` + `SCHEDULE_EXACT_ALARM` + `RECEIVE_BOOT_COMPLETED` + `BROADCAST_CLOSE_SYSTEM_DIALOGS`

This chain is the most serious, because the manifest supplies every link of a remote-compromise path in a single package, on a device that is kept permanently reachable. A persistent Firebase Cloud Messaging connection, held open by the wake lock and the foreground service, means a message can arrive at any hour with no action by the user. A push payload is processed automatically the moment it is received, and on an operating system that no longer receives security updates a crafted payload that meets an unpatched flaw can run code before anything appears on screen.

From there the remaining permissions extend the foothold. The silent download permission lets a follow-on component arrive with no visible trace. Exact alarms and auto-start on boot let it lie dormant and re-arm itself at a chosen time and across restarts. On devices below Android 12, the dialog-dismissal permission can close any system warning that might otherwise reach the owner. The same push notification mechanism was the delivery route for commercial spyware of the Pegasus class, which achieved compromise with no user interaction, and the class of flaw it relied on has equivalents on Android.

Coercion and threat. The application does not need to be malicious for this to matter. It assembles, in one place, a remotely reachable listener, a silent delivery path, a persistence mechanism, and a way to suppress warnings. That is the full shape of a remote-trigger attack, one that could be fired at a time of the operator's choosing against exactly the users whose old and unpatched phones are least able to withstand it.

Version note. *The zero-click risk turns on the operating system's patch level rather than on the push permission itself. It is greatest on the older, unpatched devices described in section 5 and lowest on a current, fully updated phone.*

Compromise chain 5: Detecting and deterring the user's own evidence

Links in the chain: `DETECT_SCREEN_CAPTURE` + `ACCESS_NOTIFICATION_POLICY` + `POST_NOTIFICATIONS` + `SCHEDULE_EXACT_ALARM`

When a permit holder tries to photograph the screen, to capture a refusal, an error, or the application's own behaviour so as to seek legal help or document mistreatment, the screenshot-detection permission notifies the application that the capture happened. The ability to read and change Do Not Disturb, together with the notification and timing permissions, means the operator can also control when and how messages reach the user and can push them through even a silenced phone.

The user is therefore watched at the precise moment they attempt to create a record, and the channel through which they receive information is held by the party they are trying to hold to account.

Coercion and threat. This both deters documentation and reveals it. A person seeking to gather evidence of how the application or the permit system treats them learns that the attempt itself is observed, which chills the very act of seeking accountability and hands the operator advance notice of it.

Version note. *Screenshot detection functions only on Android 14 and above, so on the older devices common in this population this particular link is inactive, while the notification-control elements work across versions.*

Compromise chain 6: Deanonymisation through commercial advertising data

Links in the chain: `AD_ID` + `ACCESS_ADSERVICES_AD_ID` + `ACCESS_ADSERVICES_ATTRIBUTION` + `BIND_GET_INSTALL_REFERRER_SERVICE` + `INTERNET`

Through the advertising permissions the application can obtain the device's advertising identifier, the same identifier that commercial advertising networks use to link one person's activity across every application they run. Install-referrer data ties the installation itself to a source or campaign. These permissions have no administrative function, so the most likely reason for their presence is advertising or analytics code that carries them as a dependency.

The consequence reaches beyond the application. The advertising identifier is a bridge between this application's user and a commercial profile assembled elsewhere, covering other applications used, inferred interests, and movements, and, through data brokers, frequently a real-world identity.

Coercion and threat. A user of a government permit application is thereby linked to a body of commercial behavioural data they never knowingly surrendered. Any party that operates or acquires access to that advertising data, whether the operator directly or through purchase from the advertising market, can enrich a permit holder's file with it. Because the identifier is requested through both the old and the new mechanisms, it can be obtained regardless of the device's Android version.

5 Risk in context: the device population

The setting decides the severity. The same permissions carry very different risk depending on who holds the phone and what it runs. Here the users have little practical choice about installing the application, the operator has the means to act on what it gathers, and the phones are old and largely unpatched. On that combination, several permissions that a modern device would contain are left fully effective.

Why consent is not a real control

The application is, in effect, required in order to obtain movement permits. The Android permission model assumes a user who can weigh a request and decline it, but a user who must hold a permit cannot meaningfully refuse the permissions the permit application asks for. The presence of a runtime prompt does not, in this setting, amount to genuine consent, so the usual reassurance that the user agreed carries little weight.

Why the device base matters

Android security is layered onto specific versions. Most of the protections that would blunt the permissions evaluated here arrived in particular releases, so the version a person runs largely determines how exposed they are. The devices in question skew old and cannot easily be refreshed:

- **There is no ready route to new phones.** Blockade, and since October 2023 the near-total disruption of retail, imports, electricity, and the cash economy, mean the installed base is frozen and ageing. It grows older over time rather than newer, and devices are second-hand and kept in service far past normal replacement.
- **Budget hardware stops receiving updates quickly.** Low-cost Android phones typically stop receiving operating-system and security updates within one to two years of sale, so even a mid-age device is effectively unpatched.
- **Distribution runs outside the official store.** The build evaluated here came from APK Pure, an install route on which the store's own protective measures may not apply.

On confidence. Precise figures for the mix of Android versions in Gaza are not reliably published, and less so since 2023. The assumption that the population skews toward older releases is a reasoned inference from the conditions above rather than a measured figure. The version thresholds themselves, which decide when each protection applies, are firm platform facts. A precise distribution would require sampling devices in the affected population directly.

The protections that are missing on older devices

Protection	Arrived in	Effect on a phone older than that
Runtime permission prompts	Android 6	Permissions are granted silently at install, with no prompt at all.
Background camera block	Android 9	The camera can, in principle, be reached while the application is in the background.
Scoped storage	Android 10 to 11	Storage permissions grant broad read access to all shared files, including WhatsApp media, photos, and other apps' documents.

Dialog-dismissal restricted	Android 12	The application can dismiss system dialogs, including prompts the user would otherwise read.
Privacy Sandbox ad limits	Android 13	The two newer advertising permissions are inactive, but the legacy advertising identifier route still works.
Screenshot detection	Android 14	Screenshot detection does not function.

How the device context moves each chain

Read against the older devices common in this population, roughly Android 8 to 11 and unpatched, the chains do not all move the same way. Most become more dangerous, and a couple become less so. Stated plainly:

- **The file-harvest chain becomes far more effective,** because storage permissions grant broad read access on Android 9 and below.
- **The remote-compromise chain becomes more realistic,** because an unpatched operating system leaves known flaws open beneath an always-on listener, and because dialog dismissal works on these versions.
- **The surveillance and identity-capture chains are largely unchanged,** because location, NFC, and camera behave much the same across versions.
- **The evidence-detection chain weakens,** because screenshot detection is inactive below Android 14, though its notification-control elements remain.

Overall rating

IMPACT	EXPOSURE	OVERALL
SEVERE	**ELEVATED**	**HIGH**
A coerced, surveilled population, a capable state operator, and consequences that are physical rather than financial.	Old, unpatched, sideloaded devices leave protections absent and known exploits viable.	Driven by the combination and the context, not by any single permission.

6 What the permissions do and do not establish

Precision protects the findings. The paragraphs below mark the exact edge of what the manifest supports, so that the strong conclusions are not weakened by overreach on the margins.

1. **The advertising and analytics permissions establish infrastructure and a plausible route, not proven sale.** They show that commercial tracking code is present and that a channel for data to leave the device exists. They do not by themselves prove that personal data is being sold or shared today. Confirming that requires watching the application's live network traffic.

2. **Push messaging is common, and its danger here is specific and conditional.** Firebase Cloud Messaging appears in a large share of ordinary applications, so its presence is not evidence of ill intent. The concern is narrow: a permanently open, remotely reachable listener becomes dangerous on an operating system that is no longer patched. The framing that matters is the unpatched device beneath the listener, not the push permission alone.

3. **Several capabilities are gated by Android version, and the gating runs against this population.** Screenshot detection works only on Android 14 and above. The two Privacy Sandbox advertising permissions work only on Android 13 and above. Dialog dismissal is restricted from Android 12 and above but fully functional below it. Background camera access is blocked from Android 9 onward. Broad storage reading applies on Android 9 and below. Because the affected devices skew old, the version-gated risks tend to resolve toward the more dangerous case.

4. **The silent-download permission is weak alone and meaningful only in combination.** Any application with internet access can already fetch files quietly, so this permission adds little on its own. It carries weight only as one link in the remote-delivery chain in section 4.

5. **The broad language support is most likely a template default.** The application ships localisation for around sixteen languages beyond the three the service needs. This is consistent with a third-party template that includes them by default and is not, on its own, a meaningful signal about intent.

6. **The custom permissions cannot be fully read from the manifest.** One custom permission is standard receiver housekeeping. The second gates internal developer-event functionality whose purpose cannot be determined without decompiling the application, so it is flagged rather than characterised.

7 Establishing intent: from capability to confirmation

Moving from a capability assessment to a statement about conduct requires observing a running build. The following steps would do that, in order of value:

1. **Dynamic analysis.** Run the application in an instrumented sandbox and capture its network traffic. Record which servers it contacts, which data fields leave the device, who owns the push sender identity, and which third-party advertising or analytics hosts appear. This is the single most direct route to turning suspicion into evidence.

2. **Static analysis.** Decompile the build and identify which specific SDKs carry the advertising, attribution, and dialog-dismissal permissions, naming the vendors. Map which components actually hold each permission, separating live use from dormant declarations inherited from a library.

3. **Device-version sampling.** Establish the real distribution of Android versions across the affected population. This is the input that most changes the risk rating in section 5, because so many of the chains hinge on it.

4. **Build integrity.** Confirm that the APK Pure build matches the official store release, so that findings rest on the software users actually run.

5. **Full manifest review.** Read the complete manifest, including services, receivers, queries, and exported components, rather than the permission list alone, to see how the capabilities are wired together.

Guidance that holds regardless of what analysis finds

- Keep as little personal data on the phone as possible, and assume that stored files and media may be readable on older devices.
- Treat any phone that runs the application as a device that may be monitored, and avoid using it for sensitive communication or storage.

8 Bottom line

The application requests four permissions whose only ordinary purpose is commercial advertising and install tracking, capabilities with no administrative justification in a government permit tool and a strong sign of embedded third-party code. It is built to run continuously and to restart on boot, it holds broad access to stored files, it can locate the user by two independent methods, and it carries several individually unusual capabilities, most notably silent NFC reading of identity documents. Taken together these permissions assemble into coherent chains for surveillance, coercion, and remote compromise, and on the old, unpatched phones common among the affected users the protections that would contain them are absent. The practical risk is **HIGH***. What the manifest cannot show, and what observation of a running build would be needed to establish, is whether these capabilities are being exercised today. On the present evidence that remains unproven, but the capability, and in several cases the lack of any innocent explanation for it, is clear. Appendix A develops a dual-use reading of the advertising permissions, in which the same infrastructure serves state surveillance rather than commercial advertising.*

Appendix A A dual-use reading of the advertising permissions

Section 3 assessed the four advertising and analytics permissions as commercial infrastructure with no administrative purpose. This appendix sets out a second reading of the same capability, which sits alongside the first rather than replacing it. The permissions are dual-use: the machinery built for commercial advertising can be repurposed for state surveillance, and in the hands of the operator here both readings point at the same underlying data flows. Neither reading is proven by the manifest. Both describe a capability that is present and, in this setting, unexplained by any ordinary commercial need.

The mechanism that matters: collapsing pseudonymity

The advertising ecosystem runs on the advertising identifier as a *pseudonymous* key. Data brokers hold large behavioural profiles, covering location history, the list of applications on a device, inferred interests, and social connections derived from repeated co-location, all tied to an advertising identifier rather than to a name. That pseudonymity is the one thin protection in the system. This application reads the advertising identifier directly, while the operator independently holds the user's full, verified identity, because a permit application already contains the legal name, the identity-document number, a photograph, and, in this case, biometric and location data. Reading the identifier binds those two together. The operator gains an authenticated link between a named individual and their advertising identity, and every downstream dataset that references that identifier becomes attributable to a specific, known person. The anonymity that normally limits advertising data is not merely leaked, it is defeated.

Four ways the capability could be repurposed

1. **Advertising intelligence.** Governments and militaries are documented purchasers of commercially brokered location and application-usage data, in part because buying it sidesteps legal process. With the target's advertising identifier already in hand, the operator can acquire or query broker datasets to reconstruct movements and associations far beyond what the application itself collects.

2. **Real-time bidding harvest.** Embedding advertising code makes the device emit bid requests, each broadcasting the advertising identifier, network address, device details, and often location to many participants in an ad exchange. A party positioned in that bidstream as a buyer can collect this passively, so data can be gathered without ever reaching the operator's own servers. Firms based in the region are documented participants in this style of collection, which places the pathway beyond the purely theoretical.

3. **A cover and deniability channel.** Advertising and analytics traffic is ubiquitous and noisy, so data moved inside it is hard to distinguish from ordinary telemetry, and the explanation that it is merely an advertising component is itself the cover story. The advertising identifier is requested through two independent routes, the older Google Mobile Services path and the newer Privacy Sandbox path, which guarantees it can be obtained on any Android version. That redundancy is more consistent with a wish for reliable capture than with selling advertising.

4. **Install-source intelligence.** The install-referrer permission reveals how and through what channel a person was directed to install the application, a minor but real signal about how a given user arrived at it.

Why the commercial motive being absent matters

A commercial explanation requires a reason to advertise: inventory to sell, or campaigns to attribute. A mandatory government permit application has neither. Removing the commercial motive does not make

these permissions benign. It makes the surveillance and repurposing reading relatively more likely, because the ordinary innocent reason for their presence is simply not there. Two innocent possibilities do remain, and neither can be excluded from a manifest alone: an advertising library may have carried these permissions in as a dependency that nobody removed, or they may be the by-product of a third-party template. Even in those cases the data flows described above still exist. Intent aside, the exposure is real.

What would settle the question

As with the rest of this evaluation, the manifest establishes capability and not conduct. Distinguishing a dormant dependency from active collection requires observing a running build: confirming whether the application actually reads the advertising identifier, recording where that identifier is sent, and identifying which advertising or analytics components and endpoints are involved. Those steps, set out in section 7, would separate the commercial reading from the governmental one, or show that the capability is currently inert.

In balance. These permissions are best understood not as evidence that the application shows advertisements, which it does not, but as a dual-use capability that connects the user to the advertising surveillance ecosystem. Whether that capability is inert, used commercially, or exploited by the state cannot be determined from the manifest. What can be said is that the operator is unusually well placed to exploit it, because it already holds the one thing that ecosystem normally lacks, the real identity behind the advertising identifier.