

UNHCR Privacy Notice

Personal Data Controller:	Director, Division of People Management (DPM)
DPO oversight:	HQDPO@unhcr.org
Version / Date:	1.0 — May 2026

WHO THIS NOTICE COVERS

This notice applies to all individuals whose personal data is processed by UNHCR's Division of People Management (DPM) — including international and national staff, United Nations Volunteers (UNVs), individual contractors, consultants, interns, Junior Professional Officers, seconded personnel, external candidates, and former staff.

Your rights depend on your category of engagement.

Not all rights apply equally to all personnel categories. A detailed rights matrix — setting out which rights apply to you, on what legal basis, and where limitations exist — will be made available soon. If you are unsure which category applies to you, contact your HR focal point by raising a case in Workday (if you cannot access Workday, please see the e-mail addresses at the end of this notice).

WHY WE PROCESS YOUR PERSONAL DATA

DPM processes your personal data to manage UNHCR's recruitment and employee lifecycle, including managing selection and internal mobility processes; verifying eligibility, qualifications and integrity; personnel administration and HR record-keeping; payroll, benefits and pension administration; performance management; occupational health and workplace safety; and diversity, equity and inclusion (DEI) initiatives.

WHY WE ARE ALLOWED TO PROCESS YOUR DATA

UNHCR processes your personal data on the following bases under its General Policy on Data Protection and Privacy (GDPP, UNHCR/HCP/2022/02):

- **UNHCR mandate** — Most HR processing is necessary for the performance of UNHCR's mandate and its functions under the UN Staff Regulations and Rules and applicable administrative instructions (GDPP §18(e)). This covers recruitment, personnel administration, payroll, pension, disciplinary proceedings, and integrity verification.
- **Legitimate interest** — Used in limited cases for HR analytics and system improvements that support UNHCR's operations and are compatible with its mandate (GDPP §18(f)).
- **Your consent** — Applied only to voluntary sensitive data you choose to share for DEI purposes: disability status, ethnic origin or race, and gender identity. You may withdraw this consent at any time without it affecting your employment status or entitlements.

Note on reference checks:

Before selection, reference verification requires your consent. Once you progress in the selection process, reference and integrity verification — including via the UN's ClearCheck system — becomes mandatory under UNHCR's mandate framework. You will be informed at the point of selection.

WHAT PERSONAL DATA WE PROCESS

DPM processes only personal data that is necessary for the purposes above. This includes: identification and demographic data; contact details and emergency contacts; eligibility, qualification and employment history; payroll,

benefits and pension information; performance data; and — where voluntarily provided — disability status, ethnic origin, and gender identity for DEI purposes.

HOW LONG WE KEEP YOUR DATA

Your personal data is kept only for as long as necessary for the purposes described above, in line with UNHCR's records retention schedule. Employment and payroll records are subject to mandatory retention obligations under the UN Financial Regulations and Rules — these cannot be deleted on request. Recruitment records for unsuccessful candidates are retained for a limited period following the closure of the selection process. UNHCR is currently in the process of finalizing retention schedules. These will be published in due course.

Erasure requests — important:

UNHCR's HR data retention schedules are being finalized. Until deletion mechanisms are in place, erasure requests for employment records will be formally deferred — not refused — and re-evaluated once the schedule is operational.

WHO HAS ACCESS TO YOUR DATA

Your data is shared only with those who need it to carry out the purposes above. This includes UNHCR HR staff, hiring managers and supervisors, medical personnel (for health data only, with enhanced access controls), contracted technical service providers operating under Data Processing Agreements, joint UN HR entities (OneHR, ClearCheck, the Unified Volunteer Platform), pension and insurance administrators (UNJSPF, UNSMIS, Cigna), and other contracted service providers bound by confidentiality obligations.

All recipients receive access only to the minimum data necessary for their specific function.

SYSTEMS USED

To support HR processes, DPM uses a range of systems including Workday (ERP), Workday Prism Analytics, Cority (occupational health), Oracle Health Insurance Cloud, UNSMIS, UNJSPF, Inspira/OneHR, ClearCheck, Cigna, the UN Global Index Number Database, and the Unified Volunteer Platform. Each system operates under UNHCR's instructions and is subject to applicable data protection and confidentiality requirements.

AUTOMATED PROCESSING

UNHCR uses Workday to automatically filter job applications against defined minimum eligibility criteria. No final recruitment, mobility, or HR decision is based solely on automated processing — all outputs are reviewed by UNHCR staff. You may request a human review of any automated output that has affected you. If additional AI tools with significant effects are deployed, this notice will be updated.

YOUR RIGHTS

Subject to the limitations below, and depending on your personnel category, you have the following rights under the GDPP:

- **Access** — Request confirmation of whether DPM holds personal data about you and, if so, a copy.
- **Rectification** — Request correction of inaccurate data. Routine corrections can be made via Workday self-service. Core biographical data requires documentary proof ([ST/AI/2010/2](#)). Adverse material in your file is subject to the separate procedures under [ST/AI/292](#).
- **Erasure** — Request deletion of your data where there is no longer a legitimate basis for processing. This right is significantly constrained for mandatory employment records (see above).
- **Restriction** — Request that DPM suspends active processing of your data while a factual dispute is pending or an erasure request is being assessed.
- **Objection** — Object to processing based on legitimate interest, on grounds relating to your particular situation. Objections to mandate-required processing will generally be declined. Consent for voluntary DEI data may be withdrawn at any time.
- **Human review of automated decisions** — Request human review of any automated pre-screening output that has affected you.

Which rights apply to you?

The scope of each right varies by personnel category — for example, the UN administrative justice system (MEU and UNDT) is only available to staff members and certain other categories. The full rights matrix, soon to be published, sets out the position for each category against each right, including applicable legal bases and limitations.

WHEN WE MAY DECLINE A REQUEST

DPM may decline a data subject request, in whole or in part, where (GDPP paragraph 49): the request is manifestly unfounded, abusive or obstructive; refusal is necessary and proportionate to protect UNHCR's safety or security, its confidentiality obligations, its overriding operational needs, or the rights of third parties (including referees or complainants); or the processing falls outside UNHCR's control. Where DPM cannot fulfil your request, you will be notified in writing with the reason and informed of the steps available to contest the decision.

HOW TO SUBMIT A REQUEST

Submit your request via Workday case management (case type: Duties, Obligations and Privileges). Former staff and external candidates may use the email addresses listed below. DPM will acknowledge receipt and aim to respond within 60 days.

Request from former staff:	formerstaff@unhcr.org
Request from external candidates:	recruitmentcase@unhcr.org
DPO oversight and escalation:	HQDPO@unhcr.org

IF YOU ARE NOT SATISFIED — RECOURSE

UNHCR's data protection framework provides a three-step process:

1. **Complaint to the DPM Director (Personal Data Controller)** under GDPP paragraph 51. DPM must respond within 60 days; failure to respond triggers eligibility for Step 2.
2. **Redress request to the Personal Data Protection Review Committee** under GDPP paragraphs 54–56. Must be submitted within 60 calendar days of the DPM response, or 120 calendar days if DPM has not responded. The Review Committee Secretariat is administered by the Legal Affairs Service. Submission is free of charge.
3. **Decision by the High Commissioner** under GDPP paragraphs 56–58. The Review Committee recommends; the High Commissioner decides in writing. Available remedies: provision of information; copy of data; rectification; deletion; cessation or suspension of processing; written apology. Financial compensation is not available (GDPP paragraph 58).

For staff members, the High Commissioner's decision is without prejudice to your rights under Article XI of the Staff Regulations and Chapter XI of the Staff Rules where the decision constitutes an administrative decision adversely affecting your employment terms (GDPP paragraph 60(a)). Staff members and eligible affiliated workforce may also access the Office of Staff Legal Assistance (OSLA) for advice and representation in administrative justice proceedings. The data protection redress process and the UN administrative justice system operate as distinct, concurrent processes. Exercising data protection rights does not affect your employment status or entitlements.

UPDATES TO THIS NOTICE

This notice will be updated when changes occur to the processing described above that go beyond what you would reasonably expect — including new data categories, purposes, recipients, legal bases, or tools (GDPP paragraph 12 and Advisory No. 3 paragraph 12). The current version is always available on the UNHCR intranet.

This notice is issued under UNHCR's General Policy on Data Protection and Privacy (UNHCR/HCP/2022/02) and Chief DPO Advisory No. 3 on Privacy Notices (27 November 2025). It covers personal data processed by the Division of People Management. The full Data Subject Rights Matrix — setting out rights by personnel category, legal basis, and applicable limitations — will shortly be made available for all staff. For questions, contact the DPM Data Protection Focal Point or HQDPO@unhcr.org.