

Tax Justice Network Ltd  
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Data protection consent form for providing comments on the preliminary assessment of the Financial Secrecy Index 2022

January 2022

## Introduction

You are being asked to comment on a preliminary assessment of the [Financial Secrecy Index](#) 2022.

As part of our research for the Financial Secrecy Index 2022, we at the Tax Justice Network send all the Ministries of Finance of the jurisdictions we cover a preliminary assessment in which we kindly ask them to carefully review the assessment of their country's legal framework. This is a useful opportunity for the authorities to flag any aspects they disagree with and make further comments or corrections with the corresponding legal source.

The information you provide through participating in the preliminary assessment will be used in our research and therefore your answers may have a direct impact on your jurisdiction's ranking of the Financial Secrecy Index 2022. The secrecy scores will be used as part of the [TRACE Project](#). TRACE is a research project funded by the European Union that intends to develop technology that will assist law enforcement authorities to identify and trace illicit money flows.

Participation in the preliminary assessment is voluntary and you can refuse to answer any questions or components of the survey. You have a right to ask questions in regard to the preliminary assessment and how we use the information and receive clear answers.

Responses to the preliminary assessment will be used as part of the Financial Secrecy Index 2022 and will be kept on record for future editions of the index. Information submitted will be safely stored for six years after which it will be destroyed. A request for a copy of the data you have provided can be made by emailing [info@taxjustice.net](mailto:info@taxjustice.net) and this will be sent to you within 14 days.

Information submitted will not be publicly attributed to the individual completing the preliminary assessment but to the institution they respond on behalf of (eg Ministry of Finance). The details of the individual will be held within the Tax Justice Network for the agreed time period and only accessible to the Tax Justice Network.

Responses made in this preliminary assessment may result in incidental and secondary findings, ie some information that was not the focus or primary purpose of the question(s).

If you have any questions about this assessment, the data held or the Financial Secrecy Index you are encouraged to contact our email address: [fsi@taxjustice.net](mailto:fsi@taxjustice.net) and you can also write to Moran Harari, Tax Justice Network Lead Researcher and interim director of financial secrecy and government, at: [moran@taxjustice.net](mailto:moran@taxjustice.net).

Under the Data Protection Act 2018 in the United Kingdom and the European General Data Protection Regulation (GDPR) the Tax Justice Network has an obligation to provide you the following information about your personal data processing.

**Data Controller:** Tax Justice Network C/O Godfrey Wilson Ltd, 5th Floor Mariner House, 62 Prince Street, Bristol, England BS1 4QD, United Kingdom; [moran@taxjustice.net](mailto:moran@taxjustice.net)

**Categories of personal data:** We will process your name, surname, and role at the Ministry of Finance.

**Purpose of the processing:** To store the preliminary assessments and being able to identify who has completed them. As above mentioned, the surveys responses will be used as part of the Financial Secrecy Index 2022, but any information made public will not identify any individual, therefore, the personal data collected will only be available to the Tax Justice Network.

**Legal Basis:** your consent.

**Recipients:** the data will not be shared with any third parties.

**Data Transfers:** the data may be transferred to other countries, eg the United Kingdom and Israel and countries where the European Commission has adopted adequacy decisions.

**Retention Period:** 6 years

**Data subjects' rights:** you have the right to request access, rectify, erase, or object to the data processing, the right to data portability and the right to withdraw consent at any time without affecting the lawfulness of processing based on consent before its withdrawal. You have the right to lodge a complaint before the ICO.

## **INFORMED CONSENT**

### **Terms of consent**

- I confirm that I have read the introduction above explaining the information that will be collected for the Financial Secrecy Index through the preliminary assessment and I have had the opportunity to ask questions about them.
- My participation is voluntary. I agree that the information collected from me, other than my personal data, can be used for a deliverable that might become publicly available and/or deposited in an open access repository.
- My personal data will only be accessed by the Tax Justice Network and will not be publicly available.

- I give permission for the Tax Justice Network to store my personal data and preliminary assessment responses for the purpose of their research but that I will not be identified or identifiable in any publication that results from the preliminary assessment and/or complementary published research.
- I give permission for the organisation on behalf of which I respond of to be attributed.
- I consent to the research team contacting me, if required, as a follow-up to the research activity.

**Name of Participant:** \_\_\_\_\_

**Signature:** \_\_\_\_\_

**Jurisdiction:** \_\_\_\_\_

**Date:** \_\_\_\_\_