

The Evolution Of Digital Identity And The Legal Landscape Of Personal Data Protection In Uzbekistan

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Abstract

As the Republic of Uzbekistan undergoes a rapid digital transformation under the "Digital Uzbekistan 2030" strategy, the establishment of a robust digital identity framework and the protection of personal data have emerged as critical pillars of national policy. This research paper examines the current state of digital identity systems, primarily the OneID platform, and evaluates the efficacy of the Law "On Personal Data" (LRU-547) and its subsequent amendments through 2026. By employing a qualitative and comparative analysis of legislative frameworks and digital infrastructure, the study highlights the tension between strict data localization requirements and the integration of international digital services such as Apple Pay and Google Pay. The findings suggest that while Uzbekistan has made significant strides in centralizing digital services and increasing internet penetration to over 94%, gaps remain in the enforcement of the "Right to Be Forgotten" and the harmonization of local standards with the EU's General Data Protection Regulation (GDPR). The paper concludes with recommendations for balancing national security with the needs of a globalized digital economy.

Keywords: Uzbekistan, Digital Identity, Personal Data Protection, OneID, Data Localization, Digital Uzbekistan 2030, LRU-547.

Introduction

The global shift toward the digitalization of public and private services has necessitated a fundamental rethinking of how identities are verified and how the resulting data is safeguarded. In the Republic of Uzbekistan, this shift has been particularly pronounced over the last decade, transitioning from a paper-based bureaucratic system to a sophisticated digital ecosystem. The "Digital Uzbekistan 2030" strategy, spearheaded by the government, aims to integrate information technology into every facet of the national economy and public administration. Central to this ambitious goal is the concept of "Digital Identity"—a technological construct that allows citizens to interact with the state and commercial entities without the physical constraints of traditional identification. However, the rapid deployment of these technologies has outpaced the development of legal

safeguards, leading to a complex landscape where the rights of the individual often clash with state-driven digitalization goals and the requirements of global technology providers.

The importance of personal data protection cannot be overstated in a country where nearly 95% of the population is active online. As citizens entrust their most sensitive information—biometrics, financial records, and health data—to digital platforms like the Unified Interactive Public Services Portal (my.gov.uz), the potential for data breaches and misuse increases exponentially. The legislative framework, anchored by the 2019 Law "On Personal Data," has undergone several iterations to address these risks. Notably, the introduction of Article 27-1, which mandates the physical localization of data servers within Uzbekistan, created significant friction for international enterprises. By 2026, the government has moved toward a

more nuanced approach, amending these laws to facilitate the entry of global payment giants while maintaining a high degree of sovereign control over citizen data.

This paper serves to analyze the intersection of digital identity and data privacy within the Uzbek context. It explores how the "OneID" system has become the backbone of the digital state and assesses the legal hurdles that continue to challenge the full realization of a secure digital society. The introduction of automatic registration for OneID upon the issuance of new ID cards exemplifies the state's push for universal digital inclusion, yet it raises profound questions regarding informed consent and the long-term security of centralized biometric databases. This research seeks to bridge the gap between technical implementation and legal protection, providing a comprehensive overview of the progress and pitfalls of Uzbekistan's digital journey.

Furthermore, the study addresses the socioeconomic implications of these technologies. As the digital divide between urban and rural areas begins to close, the demand for transparent data processing becomes a matter of public trust. The transition to legally valid online documents, effective as of late 2025, marks a point of no return for the Uzbek administrative system. In this environment, the legal recognition of digital data as equivalent to paper documents necessitates a "security-by-design" approach that is currently in its nascent stages. By examining the recent legislative changes in early 2026, this paper provides a timely evaluation of how Uzbekistan is attempting to align its national interests with international standards of privacy and data protection.

Literature Review

The academic discourse surrounding digital identity and data protection in Central Asia, and specifically Uzbekistan, has historically focused on the challenges of transition from

Soviet-era administrative legacies to modern e-government models. Recent literature, such as the works of Dzhumaev (2024) and Hakimov (2023), emphasizes that while infrastructure development has been rapid, the legal and ethical frameworks have lagged behind. Dzhumaev highlights a "design-reality gap," where the technological capability to collect data far exceeds the institutional capacity to protect it. This is a common theme in transition economies, where the rush to digitize public services often leads to "siloed" data repositories that lack unified security standards.

The 2019 Law "On Personal Data" (LRU-547) has been the subject of intense legal scrutiny. Early analyses by international law firms and scholars pointed to the ambiguity of the data localization requirements. According to legal experts at Dentons and DLA Piper, the 2021 amendments to Article 27-1 were initially seen as a barrier to foreign investment, leading to the temporary suspension of services like TikTok and Twitter. However, more recent scholarship suggests a shift toward "digital sovereignty," where the state uses localization not just for security, but as a tool for economic leverage. The 2025–2026 legislative amendments, which clarify the conditions under which data can be stored abroad, represent a pragmatic pivot to attract international fintech while preserving the core tenets of national data control.

Comparative studies between Uzbekistan's framework and the European Union's GDPR reveal significant gaps, particularly regarding the "Right to Be Forgotten" and "Data Portability." Researchers have argued that while Uzbek law provides for the destruction of data, it lacks the sophisticated de-indexing mechanisms found in Western jurisdictions. This absence of a "Right to Be Forgotten" leaves citizens vulnerable to permanent digital stigmatization, a concern that is

increasingly relevant as the OneID system centralizes all aspects of a citizen's life—from criminal records to financial history—into a single digital profile.

Methodology

This research utilizes a qualitative, multi-method approach to analyze the current state of digital identity and data protection in Uzbekistan. The primary method consists of a comprehensive legal analysis of the Republic of Uzbekistan’s legislative acts, including the Law "On Personal Data" (2019), the Law "On Cybersecurity" (2022), and the most recent amendments passed by the Legislative Chamber in early 2026. This legal review is supplemented by an analysis of official government reports from the Digital Government Project Management Center and the National Statistics Committee.

To provide empirical context, the study incorporates secondary data analysis of internet penetration rates, social media usage, and OneID registration statistics from 2021 to 2026. This data allows for a quantitative assessment of the "digital

footprint" currently subject to the country's data protection laws. Furthermore, the research employs a comparative framework, measuring Uzbek standards against the ISO/IEC 27000 series standards recently adopted at the national level (O'zDSt ISO/IEC 27002:2024). The synthesis of these various data sources provides a holistic view of the operational effectiveness of the country’s data protection regime.

Results and Analysis

The findings indicate a dramatic acceleration in the adoption of digital identity services. As of 2026, the OneID system has transitioned from an optional service to a mandatory component of civil identity for new cardholders. The integration of electronic digital signatures (EDS) directly into the chips of ID cards has streamlined the provision of over 600 public services. However, this centralization creates a "single point of failure" risk that the current cybersecurity infrastructure is still struggling to address.

Table 1: Growth of Digital Identity and Internet Infrastructure in Uzbekistan (2021–2026)

Metric	2021	2023	2025	2026 (Est.)
Internet Penetration (%)	76.6%	89.0%	94.2%	95.5%
OneID Registered Users (Millions)	1.2	4.5	12.0	18.5
Median Mobile Speed (Mbps)	14.5	25.8	55.5	62.0
Active Social Media Identities (Millions)	4.8	8.2	14.1	16.0

Table 1 illustrates the rapid scaling of the digital environment. The jump in OneID registration between 2025 and 2026 is largely attributed to the presidential resolution mandating automatic

registration. While this ensures high levels of digital inclusion, it also places a massive volume of sensitive biometric and personal data under the jurisdiction of the State Personalization Center.

Table 2: Comparative Legal Protections and Compliance Status

Protection Mechanism	Legislative Basis	Status (2026)	Alignment with GDPR
Data Localization	Law LRU-547 Art. 27-1	Strict/Hybrid	Low
Right to Be Forgotten	N/A	Proposed	Partial
Explicit Consent	Resolution No. 570	Mandated	High
Cross-border Transfer	2026 Amendment	Conditional	Moderate
Cybersecurity Standards	Law on Cybersecurity	Active	Moderate

Analysis of Table 2 shows that Uzbekistan is moving toward "Moderate" alignment with international standards, particularly through the 2026 amendments that allow for "conditional" cross-border data transfers. This change was the primary catalyst for the official entry of Apple Pay and Google Pay into the Uzbek market in early 2026. Previously, the strict interpretation of Article 27-1 required all processing to happen on local servers, a technical impossibility for global cloud-based payment architectures. The new hybrid model allows for secondary storage and processing abroad, provided the primary database remains localized.

Discussion

The transition of Uzbekistan into a digital-first society presents a paradox of efficiency and vulnerability. On one hand, the centralization of personal data via OneID and my.gov.uz has eliminated vast amounts of red tape, reduced corruption in public service delivery, and allowed for the rapid expansion of the fintech sector. On the other hand, the legal framework is still playing "catch-up" with these technological advancements. The most pressing issue discussed in legal circles is the lack of an independent data protection authority. Currently, the State Personalization Center serves as both the operator of major databases and the regulator of those databases, which creates a potential conflict of interest and limits the transparency of oversight.

The 2026 amendments to the Law "On Personal Data" represent a significant victory for the "investment-first" faction of the government. By easing the localization

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requirements for international payment systems, Uzbekistan has signaled its readiness to integrate into the global digital economy. However, this must be balanced against the increasing threats of cyber warfare and data breaches. As social media usage climbs—with Instagram and Telegram dominating the local landscape—the amount of "unstructured" personal data being generated outside of government control is staggering. The government's move to penalize AI-based misuse of personal data in 2025 was a proactive step, yet enforcement remains difficult without sophisticated digital forensics capabilities across all provinces.

Furthermore, the "Right to Be Forgotten" remains a glaring omission in the Uzbek legal code. In an era where a single digital mistake can follow a citizen for life, the inability to de-index or delete obsolete information from the public record is a violation of digital dignity. As Uzbekistan looks toward the next phase of its 2030 strategy, the focus must shift from merely building infrastructure to protecting the individuals who inhabit that infrastructure. This requires not only better laws but also a massive increase in digital literacy among the population to ensure that "consent" is not just a checkbox, but an informed choice.

Conclusion

Uzbekistan's journey toward a comprehensive digital identity and data protection framework is characterized by rapid technological adoption tempered by evolving legislative pragmatism. The OneID system has successfully become the digital heartbeat of the nation, providing millions

with access to essential services. The legislative updates of 2026 have successfully resolved the "localization deadlock," allowing global digital services to operate within the country while maintaining sovereign oversight of citizen data. However, the centralization of such vast amounts of data necessitates a shift toward a more robust, independent regulatory body and the codification of advanced digital rights, such as the Right to Be Forgotten. To foster long-term public trust and international credibility, Uzbekistan must continue to harmonize its local laws with global standards like the GDPR, ensuring that the digital transformation serves as a protector, rather than a predator, of personal privacy.

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