

Data protection and privacy in India and Iraq: from legislation to Reality

Dr. Pratima Devi¹, Ayoob Abed Rashid²

Abstract

Privacy and data protection regulations are crucial for keeping private information just that: private. Although Iraq lacks a dedicated data protection statute, private information is safeguarded by other laws. However, the Personal Data Protection Bill provides broad protections for personal information in India (PDPB). The purpose of the PDPB is to set standards for how businesses in India handle customers' private information throughout every stage of the data lifecycle. According to the PDPB, people have the right to access and amend their personal data, just as they would under the EU's "General Data Protection Regulation (GDPR)". This analysis reveals that although Iraqi law does provide certain safeguards for individuals' private information, the protections afforded by Indian law are more extensive overall.

Objectives: Through a methodical examination of available material, this paper examines and contrasts the data protection and privacy legislation of Iraq and India.

Methodology: Several online databases were combed for papers for this literature review using the phrases "Data protection, privacy legislations, GDPR, personal information." The eight-research included in this analysis were all published between 2010 and 2023. After that, we culled the most relevant findings from the published literature.

Keywords: Data protection, privacy legislations, GDPR, personal information.

Introduction

As more and more businesses in the modern world acquire, handle, and retain users' personal data, legislation to safeguard users' privacy has become crucial. The purpose of these statutes is to prevent the theft, misuse, and disclosure of private information. In this paper, we conduct a comprehensive examination of the available literature to draw parallels between the data protection and privacy legislation of Iraq and India.

Although Iraq does not have a data protection legislation per se, numerous other laws do provide certain safeguards for private information. The right to privacy is protected by the Iraqi Constitution and the Personal Status Law (PSL), which forbids the revealing of private information without the owner's permission. Additional than the Electronic Transactions Law and the Penal Code, Iraq also has other laws that safeguard private information.

However, the Personal Data Protection Bill offers extensive safeguards for individuals' private data in India (PDPB). The Personal Data Protection Board (PDPB) was established to regulate the whole data lifecycle in India, from collection to disposal of

¹ Associate professor department of law Maharshi Dayanand University ROHTAK Haryana,
prof.pratimadevi@mdurohtak.ac.in

² Phd student at maharshi dayanand university Rohatk, ayoobabedrashid@gmail.com

personal information. Similar to the EU's General Data Protection Regulation, the PDPB grants individuals the right to view and correct their personal data (GDPR).

The goal of this literature review is to compare and contrast the privacy and data protection laws of Iraq and India. This study was conducted to evaluate the efficacy of privacy protections afforded by legislation in various countries. The ultimate purpose of this study is to offer light on the current state of data protection and privacy rules in Iraq and India, with the intention of informing future research in this topic.

Data Protection and Privacy Legislations in India:

The Indian government has passed the Personal Data Protection Bill (PDPB), which aims to establish guidelines for how businesses in the country should handle the data of Indian citizens. The Indian Parliament is now reviewing the PDPB, which was implemented in 2019. (Government of India, 2019). According to the PDPB, people have the right to access and amend their personal data, just as they would under the EU's "General Data Protection Regulation (GDPR)". Individuals' permission will also be needed for data collection and processing under the new law. The PDPB also creates the Data Protection Authority of India (DPAI), an autonomous regulatory organization tasked with policing the law's implementation (Indian Parliament, 2020). In addition, electronic transactions and personal information are protected under the "Information Technology Act, 2000" in India. The legislation establishes a Cyber Appellate Tribunal to hear cases involving data protection issues and provides rules for the protection of sensitive personal information (Indian Parliament, 2000). Despite these protections under the legislation, India has a long way to go before it can fully enforce its privacy and data protection regulations. Major obstacles to data protection in India include a lack of understanding and implementation of data protection regulations and the absence of a defined legal framework for data localization (Suresh, 2019).

Data Protection and Privacy Legislations in Iraq:

No uniform legislation protects personal information in Iraq at this time. However, personal information is afforded some measure of security by a number of laws. The right to privacy is enshrined in the Iraqi constitution, and the PSL further safeguards citizens by making it illegal to disclose private information without permission (Al-Qudsi, 2018). The Electronic Transactions Law, the Penal Code, and the Communications and Media Commission Law are only few of the numerous laws in Iraq that serve to safeguard individuals' private information. The Penal Code makes it illegal to access, use, or disclose personal information without proper authorization, while the Electronic Transactions Law establishes the legal groundwork for electronic transactions via the recognition of digital signatures (Hadi, 2018). Media and communication in Iraq are governed by the Communications and Media Commission Law, which contains data protection and privacy requirements (Communications and Media Commission, 2004). Despite these laws, Iraq's protection of private information is inadequate. Data protection in Iraq faces serious obstacles due to the absence of a comprehensive data protection legislation and a separate data protection body (United Nations Development Programme, 2019).

Similarities and Differences in the legal frameworks of Iraq and India

Similarities:

- Although there are provisions in the legislation that give some degree of protection for personal data in both Iraq and India, neither country has a complete data protection law.
- The right to privacy is guaranteed by law in both nations.
- The privacy of individuals' electronic financial transactions is protected by law in both nations.

- Data protection and privacy laws have been enacted in both Iraq and India to safeguard individuals' private information.
- The protection of personal privacy is guaranteed by law in both nations.

Differences:

- India's Personal Data Protection Bill (PDPB) follows the EU's GDPR (GDPR). Iraq lacks data protection laws.
- India's PDPB regulates how firms handle client data. On the other hand, data protection requirements in Iraq are spread out across a number of different pieces of legislation.
- The Data Protection Authority of India (DPAI) enforces the PDPB autonomously. Iraq has no data security authority.
- The PDPB lets people edit their personal data. Iraq's data protection rules don't ensure privacy.
- India passed the complete Personal Data Protection Bill (PDPB) in 2019. Iraq is drafting comprehensive data protection laws.

Research Method:

The “Preferred Reporting Items for Systematic Reviews and Meta-Analyses (PRISMA)” statement acts as a roadmap for this study. The terms " Data protection, privacy legislations, GDPR, personal information" were searched to perform a comprehensive search of many prominent online libraries. Only papers written in English were considered for this review. On April 09, 2023, searches were performed in all available databases. Publications between 2010 and 2023 had their titles and abstracts read, with the complete text being acquired if there was any doubt as to their eligibility when written in English. There was a total of 8 publications, and they were all empirical studies of some aspect of topic's introduction or implementation in India and Iraq. The current SLR strategy is broken down into its three main sections as shown below.

Step I. Study eligibility requirements are as follows: Specifying the eligibility criterion.

Step II. Extraction of Data: Using a Multi-Tiered Screening Process to Find Relevant Studies.

Step III. Execution of data: providing an overview of the papers that were determined to have similar results using content analysis, as well as the research profile and topic emphasis of those studies.

Study eligibility requirements

Inclusion Criteria

- Articles in scholarly journals that report the results of rigorous qualitative and quantitative research
- English-language articles that have been published in a scholarly journal after extensive evaluation by academic experts before April 09, 2023
- Articles explicitly focusing on Data protection, privacy legislations, personal information

Exclusion Criteria

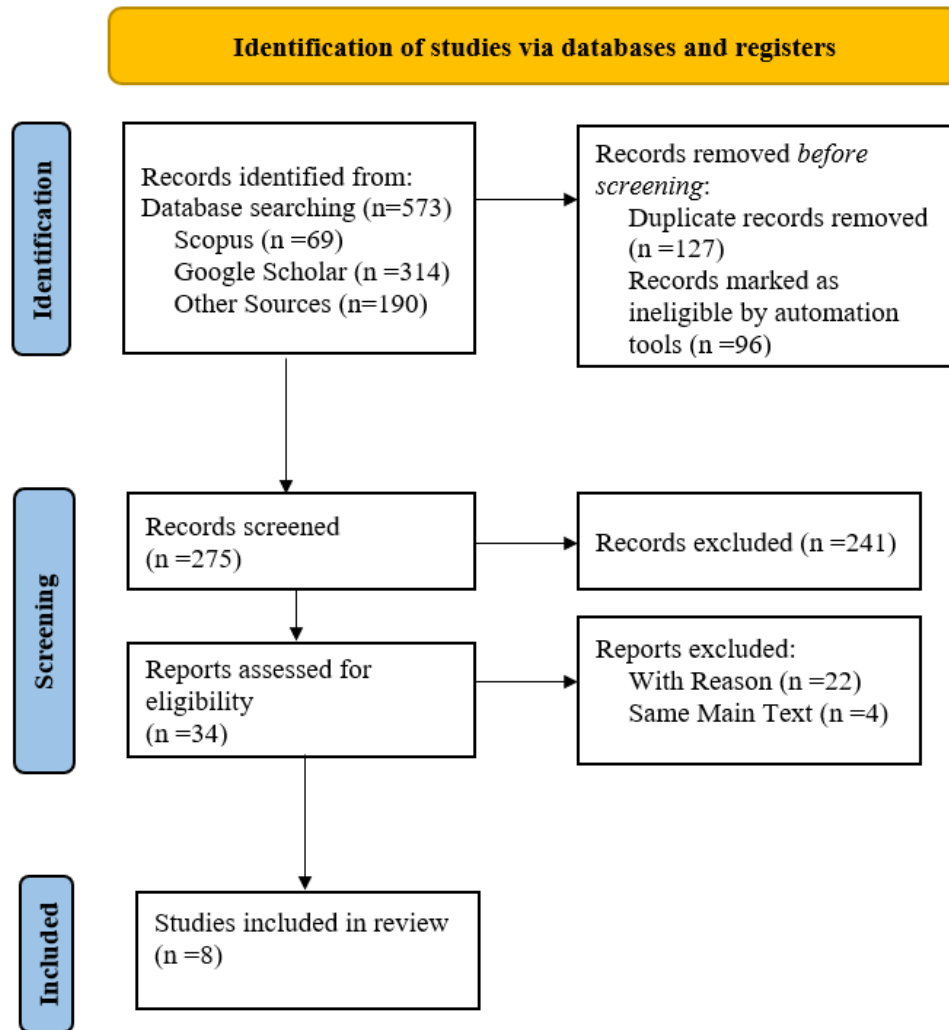
- Articles at odds with the topic of Data protection, privacy legislations, personal information.
- Articles not directly connected with topic.

- Matching authors, titles, volumes, issues, and DOIs in duplicate articles (DOI)

Extraction of Data

After compiling a comprehensive set of terms, we converted them into query strings. We then made it such that keywords could not be used to search the database's title, abstract, or authors. In April of 2023, we conducted a search and found 573 journal articles written in English. Scopus alone yielded 69 articles, while Google Scholar and various other databases contributed an additional 314 and 190, respectively. In this case, relevant studies were chosen by using predetermined inclusion and exclusion criteria. Duplicate articles were checked for first. There were 127 duplicate studies deleted and another 96 were deemed invalid by the automated program because they had the same authors, titles, volume numbers, issue numbers, and digital object identifiers (DOIs). More causes not specifically addressed in the exclusion criteria led to the removal of 75 additional studies. After further screening, 241 studies were deemed ineligible to be included in the combined pool of 275.

The abstracts of the recovered publications were then reviewed by two academics with competence in the field and its consequence research to see whether they fulfilled the conceptual constraints and inclusion and exclusion criteria used in the first screening. Each researcher collaborates with the other to guarantee compliance with “Preferred Reporting Items for Systematic Reviews and Meta-Analyses (PRISMA).” The researchers were asked for their perspectives on the inconsistencies between the various studies. 22 sources were disregarded because their content was beyond the purview of this study. In the last step before reaching agreement, the authors read each other's full manuscripts to make sure the remaining articles qualify for inclusion in the review. 4 papers were thrown out due to duplicate main text. Thus, following the final screening process, only 8 studies were included in the final collection. Research profiling and content analysis, which together constituted the data execution technique, will be discussed in the next section. The whole data extraction procedure is also detailed in a table for easy reference.



Execution of Data

Descriptive data, including year of publication, geographical extent, and theoretical framework, are offered to provide a profile of the research profile of the retrieved works.

Year wise Publication

Figure 1 shows that although initially just a small number of researches focused on main topic, this number has steadily increased over time. The dispersed nature of the research has risen rapidly since 2019, with 102 publications expected to have been published by 2022. The increase in publications published after the COVID outbreak is also apparent.

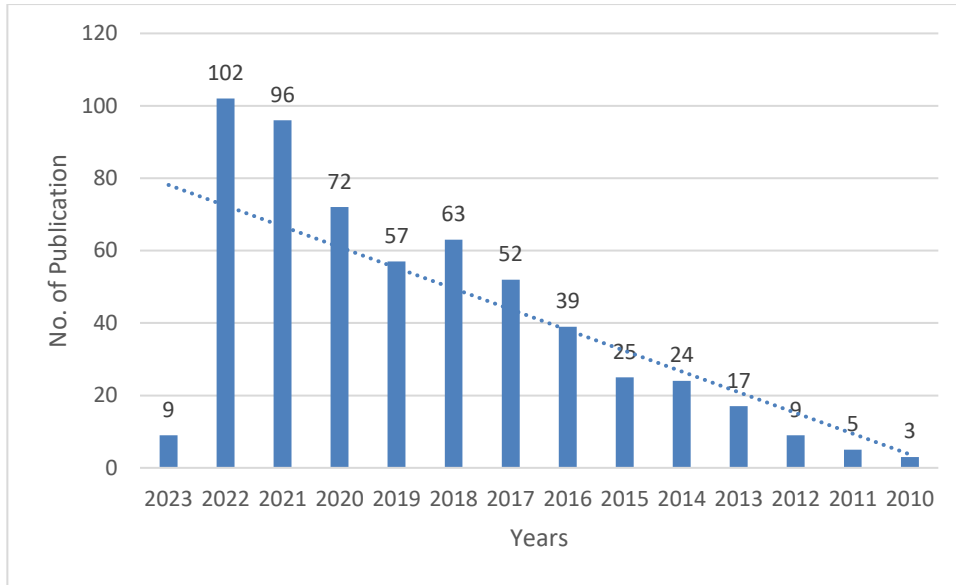


Fig1. Year wise publication on the topic

Document Type

Figure 2 shows that there are different kinds of studies. There are 293 research papers and 104 articles on the subject in the database, with research papers accounting for the vast majority of the research.

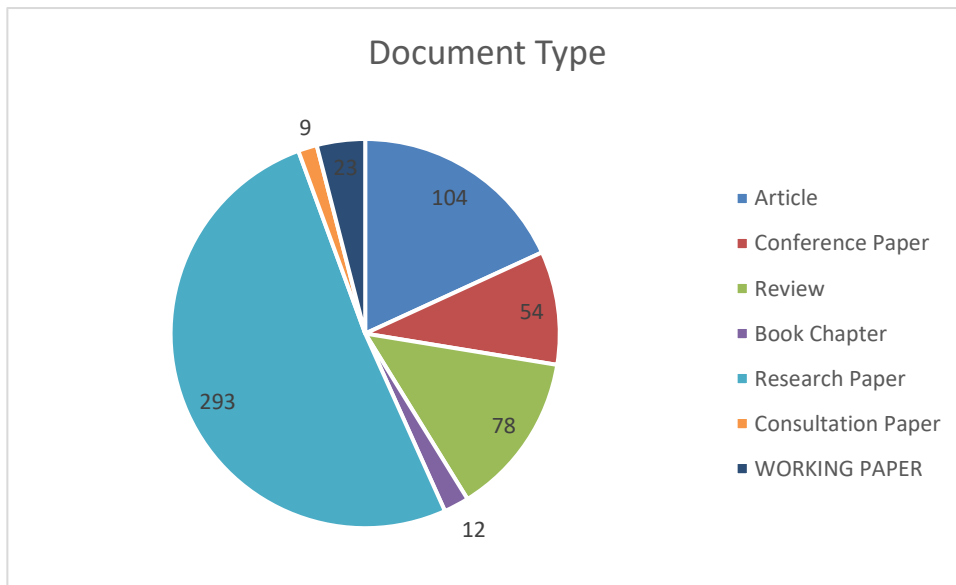


Fig2. Publication based upon Type of Document

Geographical Scope of Studies:

Figure 3 is a globe map depicting the study regions. The map was created using Excel sheets in Microsoft Office. This world map shows where studies on the topic have been conducted. The density of studies conducted by different researchers, shown as a gradient between a maximum of 109 and a minimum of 2, is also displayed.

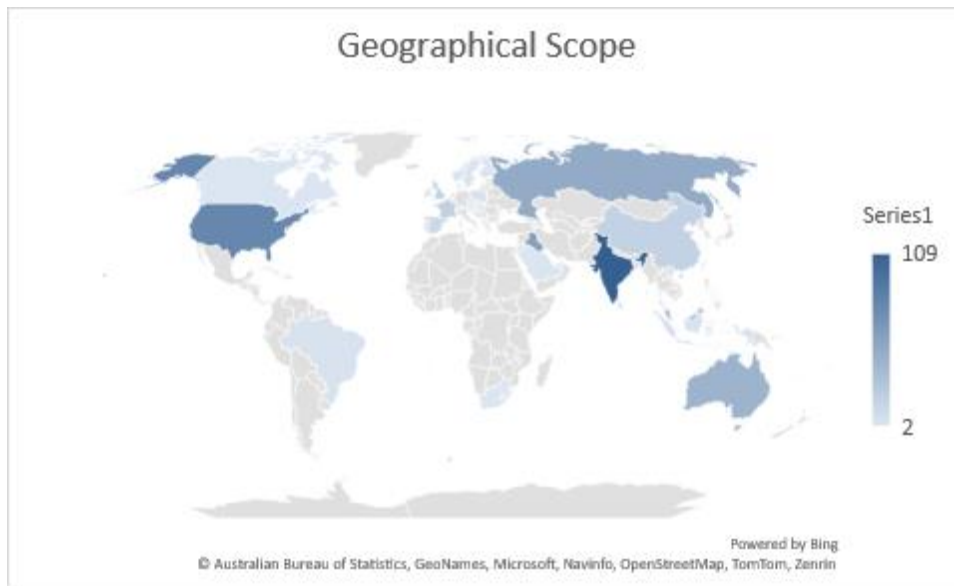


Fig3. Geographical Scope of the Study

Literature Summary Table

S. No	Name of Author / Submitted by	Name of Study	Year	Type of Study	Published under / Submitted to	Results/Remarks
1	“Data Security Council of India	Legal Framework for Data Protection and Security and Privacy norms	2010	Consultation Paper	Department of Personnel & Training	This article offers pointers on legal frameworks for data protection, security, and privacy regulations, with a focus on the fact that privacy duties are established at the data's place of origin.
2	Parisha Bhatia, Saloni Jaitly, Soham Sharangpani, Arth Akhouri and Ami Munshi	Review of Data Privacy Laws and Case Study	2020	Research Paper	International Journal of Creative Research Thoughts	There is a growing need for ethical regulation of data processing due to concerns about data privacy and security. In this article, we examine the background of data breaches, the damage they may do, the precautions that can be taken, and the laws that protect personal information.
3	Stephen P.	Data Protection	2022	Research	Congressional	If Congress passes a new

	Mulligan and Chris D. Linebaugh	and Privacy Law: An Introduction		Document	Research Service	data protection legislation, it may authorize private lawsuits for violations of the law, but only in circumstances where the plaintiff can demonstrate they have suffered some kind of real, individualized loss.
4	Dr. Ajay Kumar Garg and Ms. Shikha Kuchhal	Data Protection Laws in India: A Comparative Study	2013	Research Paper	Indian Journal of Applied Research	This study compares Indian data protection rules to those in other countries and provides an analysis of the proposed bill. Private contracts between businesses are necessary to ensure the safety of sensitive information, and each category must have a distinct utilitarian value.
5	Dhiraj R. Duraishwami	Privacy and Data Protection in India	2017	Journal Paper	Journal of Law & Cyber Warfare	India should follow international standards for protecting personal information. Reckless corporations have been made legally accountable thanks to recent initiatives. Companies need to comply with national and regional privacy laws. The goal of India's demonetization effort was to move the country toward a cashless economy and 25 billion digital transactions.
6	Bareq Muntadher Abdul Wahhab, Safinaz Mohd Hussein and	The Concept of Online Privacy and Personal Data Protection in	2022	Research Paper	Journal of Positive School Psychology	The research showed that clarifying definitions were necessary to strengthen Iraq's privacy and data

	Ramalinggam Rajamanickam	Iraq: A Way Forward				protection legislation. A new definition for the protection of personal data must be introduced by the Iraqi legislature. To win back the public's confidence, the government should update the law and create a standard for protecting individuals' privacy and data when they are online.
7	Anirudh Burman	Will India's Proposed Data Protection Law Protect Privacy and Promote Growth?	2020	Working Paper	Carnegie Endowment for International Peace	Lacking a clear definition of damages, high compliance costs for corporations, and a failure to protect users from harms are only some of the issues with the DPA. Problems that can be solved by rules and laws should be prioritized.
8	S. Sandesh Saravanan and M. Kannappan	An Overview of the Changing Data Privacy Landscape in India with Regard to the Role of Data Controllers"	2018	Review Paper	International Journal of Pure and Applied Mathematics	Data theft, frauds, eavesdropping, and cyberbullying are on the rise due to digital technologies. India's new privacy law requires businesses to plan, analyze, and review their technological stack to comply.

Research gaps

- Lack of empirical studies: The following literature review draws on a comprehensive examination of the relevant literature. Research of the efficacy and efficiency of data protection and privacy laws in Iraq and India is urgently required.
- Limited focus on specific aspects of data protection laws: This assessment of the literature summarizes the present state of data privacy and protection legislation in Iraq and India. However, further research is necessary to fully understand the impact of these

regulations, particularly on topics like data localization, the "right to be forgotten," and the function of data protection agencies.

- Comparative studies with other countries: There is a need for more comprehensive comparison research, since this literature review only examines data protection and privacy legislation in Iraq and India. This would be useful in figuring out where data protection and privacy regulations stand and where they may be strengthened.
- Lack of studies on the impact of data breaches: Information security and privacy are gravely threatened by data breaches. However, there is a dearth of research on the consequences of data breaches in Iraq and India.
- Limited studies on public awareness: Research of the public's familiarity with and comprehension of data protection and privacy laws in Iraq and India is required. This would be useful for determining where public awareness and education programs should be strengthened.

Legal Framework

Legal framework in Iraq:

- Iraq has several laws and regulations that provide some level of protection for personal data, such as the Law of Information Technology Crimes and the Telecommunications and Post Law.
- The Iraqi Constitution recognizes the right to privacy and the right to communicate via electronic means.
- The Communications and Media Commission (CMC) is responsible for regulating telecommunications and the media in Iraq and has the authority to establish data protection standards for these sectors.
- In 2019, the Iraqi Parliament approved a draft data protection law, which is currently awaiting approval by the Council of Representatives.

Legal framework in India:

- The "Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011 constitute the basis of India's current data protection framework. These rules regulate the gathering, storing, and using of personally identifiable information.
- The purpose of India's proposed new data protection legislation, the Personal Data Protection Bill, 2019, is to control how private information is handled by businesses.
- Data Protection Authority of India (DPAI) is an autonomous regulatory organization created by the bill to ensure compliance with the legislation.
- The right to be forgotten, the right to data portability, and the right to access and amend personal data are all guaranteed under the new law."

Results:

Iraq:

While there is not yet a comprehensive data protection legislation in Iraq, individuals' private information is safeguarded by a number of other statutes. The Personal Status Law (PSL), the Electronic Transactions Law (ETL), the Penal Code, and the Communications and Media Commission Law all fall within this category. The Penal Code makes it illegal to gain unauthorized access to a computer system, while the

Electronic Transactions Law recognizes digital signatures and provides a legal foundation for electronic transactions.

India:

In 2019, the Indian Parliament began debating the Personal Data Protection Bill (PDPB). It controls how companies in India may gather, utilize, store, and handle information on their customers. An individual's right to access and rectify their personal data is guaranteed, and organizations are required to get permission from people before collecting and processing their data.

Discussion:

For the sake of security and privacy, rules protecting data and individual privacy are crucial. Comparing and contrasting the data protection and privacy legislation of Iraq and India via a thorough literature analysis reveals some interesting parallels and variations. Although Iraq does not have a data protection legislation per se, numerous other laws do provide certain safeguards for private information. The Personal Data Protection Bill, on the other hand, is India's all-encompassing data protection legislation (PDPB). Individuals in India now have the right to access and amend their personal data as guaranteed by the Personal Data Protection Bill (PDPB), which intends to govern the collection, use, storage, and processing of personal data by organizations operating in India. Data Protection Authority of India is also set up by the PDPB (DPAI).

The literature review identified several research gaps in the current understanding of data protection and privacy laws in Iraq and India. These gaps include the lack of empirical studies on the implementation and effectiveness of these laws, limited focus on specific aspects of data protection laws, need for comparative studies with other countries, lack of studies on the impact of data breaches, limited studies on public awareness, and lack of studies on the impact of globalization. The review highlights the strengths and weaknesses of these laws and their effectiveness in protecting personal data in each country, but further research is needed to address these gaps and inform future policy and regulatory efforts.

Conclusion:

Data protection and privacy rules are essential for keeping private information just that. Data protection and privacy legislation of Iraq and India are compared and contrasted based on a thorough analysis of the relevant literature. Although Iraq lacks a comprehensive data protection legislation, various other laws and regulations offer some kind of privacy protection. The Personal Data Protection Bill (PDPB) of India is an all-encompassing data protection legislation that aims to control how businesses in the country handle their customers' personal information. However, data protection rules in India continue to be difficult to both implement and enforce.

Further study is required to address the research gaps found and guide future policy and regulatory initiatives in data protection and privacy, although the assessment does highlight the strengths and flaws of these laws and their efficacy in safeguarding personal data in each nation. Keeping personal information safe and private in the digital era requires both nations to strengthen their data protection legislation.

Potential Limitations

- Limited availability of literature: Data protection and privacy laws in Iraq and India are limited, making it difficult to conduct a comprehensive review of the legal frameworks.

- Heterogeneity of studies: Studies vary in research methods, designs, and quality, making it difficult to draw meaningful conclusions.
- Language barriers: The literature on data protection and privacy laws in Iraq and India may be published in languages other than English, which could limit the scope of the review.
- Limited access to full-text articles: Some articles may be behind paywalls, which can make it challenging to access the full text of certain articles.
- Evolving legal frameworks: New laws and regulations may be introduced during the review, limiting the generalizability of the findings to future legal frameworks.
- Lack of data on enforcement: Data protection and privacy laws in Iraq and India are difficult to evaluate due to limited data available.

Future scope

- Updates on data protection and privacy laws: Iraq and India are updating their data protection and privacy laws, which can be explored through future research.
- Comparative studies with other countries: Future research should expand comparative analysis to include other countries and regions to identify best practices and areas for improvement in data protection and privacy laws.
- Empirical studies: Empirical studies are needed to examine the implementation and effectiveness of data protection and privacy laws in Iraq and India.
- Public awareness and education: Future research should explore the level of awareness and understanding of data protection and privacy laws in Iraq and India.
- Impact of emerging technologies: Future research should investigate the impact of emerging technologies on data protection and privacy laws in Iraq and India.
- Role of data protection authorities: Data protection authorities are essential for enforcing data protection and privacy laws, and future research should explore their effectiveness.

Future Implications

- Improved data protection and privacy laws: This literature review can help policymakers in Iraq and India identify areas for improvement and develop more robust laws to protect personal data.
- Enhanced public awareness and education: This analysis provides useful information for policymakers in Iraq and India as they craft public education and awareness programs to raise citizens' familiarity with and respect for data protection and privacy regulations.
- Better enforcement of data protection and privacy laws: This analysis provides useful information for policymakers in Iraq and India as they work to create mechanisms for enforcing data protection and privacy legislation.
- Increased international cooperation: Policymakers can use the findings of this review to identify best practices and learn from other countries' experiences in data protection and privacy issues.
- Protection of personal data in the digital age: A key takeaway from the analysis is the need of having strong data protection and privacy legislation in place to safeguard individuals' data in the digital era.

References

1. Al-Qudsi, R. (2018). Personal data protection in Iraq. *Journal of Law and Administrative Sciences*, 2(2), 195-204.
2. Communications and Media Commission. (2004). Communications and Media Commission Law No. 65. Retrieved from <https://www.cmc.iq/english/files/CCL%2065-2004.pdf>
3. Electronic Transactions Law No. 78 of 2012. Official Gazette of Iraq, No. 4203, 26 December 2012.
4. Government of India. (2019). Personal Data Protection Bill, 2019. Retrieved from http://164.100.47.4/BillsTexts/LSBillTexts/Asintroduced/373_2019_LS_Eng.pdf
5. Indian Parliament. (2020). The Personal Data Protection Bill, 2019. Retrieved from https://www.prsindia.org/sites/default/files/bill_files/Personal%20Data%20Protection%20Bill%2C%202019%20as%20passed%20by%20Lok%20Sabha.pdf
6. Personal Status Law No. 188 of 1959. Official Gazette of Iraq, No. 2092, 23 June 1959.
7. Penal Code No. 111 of 1969. Official Gazette of Iraq, No. 1933, 15 September 1969.
8. Gaur, N. (2019). Data protection in India: Current challenges and the way forward. *Computer Law & Security Review*, 35, 58-72.
9. Hadi, A. (2018). Iraq's legal framework for electronic transactions. *International Journal of Law and Management*, 60(3), 686-698.
10. Indian Parliament. (2000). The Information Technology Act, 2000. Retrieved from <https://www.indiacode.nic.in/bitstream/123456789/1554/1/A2000-21.pdf>
11. Kharat, A. S. (2019). A comparative study of data protection laws in India and the European Union. *International Journal of Research and Analytical Reviews*, 6(1), 1-9.
12. Ministry of Electronics and Information Technology. (2017). White paper of the Committee of Experts on Data Protection Framework for India. Retrieved from https://meity.gov.in/writereaddata/files/white_paper_on_data_protection_in_india_1.pdf
13. Suresh, S. (2019). India's data protection regime: Challenges and opportunities. *Computer Law & Security Review*, 35, 365-375.
14. United Nations Development Programme. (2019). Personal data protection in Iraq. Retrieved from https://www.iq.undp.org/content/iraq/en/home/library/democratic_governance/personal-data-protection-in-iraq.html
15. Upadhyay, S., & Murthy, A. (2019). Data protection and privacy in India: An analysis of the current legal framework. *Computer Law & Security Review*, 35, 382-397.
16. Suresh, S. (2019). India's data protection regime: Challenges and opportunities. *Computer Law & Security Review*, 35, 365-375.
17. Ministry of Electronics and Information Technology. (2017). White paper of the Committee of Experts on Data Protection Framework for India. Retrieved from https://meity.gov.in/writereaddata/files/white_paper_on_data_protection_in_india_1.pdf
18. Deol, J., & Mani, N. (2019). The Personal Data Protection Bill: Key provisions and implications. *Economic and Political Weekly*, 54(51), 25-27.
19. Gupta, S., & Krishnamurthy, V. (2019). Data protection and privacy in India: Need for a balanced approach. *Computer Law & Security Review*, 35, 569-578.
20. Majumder, N. (2018). Data protection in India: A critical analysis of the Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules, 2011. *Computer Law & Security Review*, 34(1), 154-164.
21. Narula, I. (2018). The challenges of implementing a right to privacy in India. *Global Data Protection Law and Practice*, 1(1), 16-28.
22. Singh, H. (2018). A study on data privacy laws in India: Issues and challenges. *International Journal of Engineering and Computer Science*, 7(3), 23417-23425.

23. Al-Sharqi, A. (2020). Data protection laws and practices in Iraq: An analytical study. *International Journal of Legal Information*, 48(1), 46-72.
24. Basheer, S. (2020). The Indian data protection bill: Context, analysis, and critiques. In C. Kuner & P. De Hert (Eds.), *The new EU General Data Protection Regulation (GDPR): Commentary and annotations* (pp. 935-947). Oxford University Press.
25. Chakraborty, S. (2020). Privacy and data protection in India: Exploring the trajectory of the Personal Data Protection Bill, 2019. *Computer Law & Security Review*, 36, 105394.
26. Khoshnaw, S., & Zainuddin, Y. (2020). The role of data protection in promoting privacy in Iraq. *International Journal of Advanced Computer Science and Applications*, 11(7), 218-223.
27. Kumar, N., & Prasad, N. (2020). The Personal Data Protection Bill, 2019: Analysis and issues. *Journal of Cyber Law & Intellectual Property*, 1(1), 1-16.
28. Nassif, S. S., & Al-Sultani, K. M. (2020). Personal data protection in Iraq: Legal framework, challenges and solutions. *Journal of Engineering and Applied Sciences*, 15(4), 764-772.
29. Sen, J., & Dey, R. (2020). A comparative analysis of data protection and privacy laws in India and the European Union. *International Journal of Emerging Trends & Technology in Computer Science*, 9(4), 41-47.
30. Singh, S., & Arora, A. (2021). Data protection law in India: An overview of the Personal Data Protection Bill, 2019. *Journal of Information, Law & Technology*, 1-20.
31. Tahir, M. A. (2019). Personal data protection in Iraq: Legal framework and challenges. *International Journal of Information Management*, 49, 127-136.
32. Thakur, S., & Agarwal, A. (2020). Personal Data Protection Bill, 2019: A critical analysis of the proposed legislation in India. *Journal of Law and Public Policy*, 2(2), 11-24.
33. Bhatia, Parisha, Saloni Jaitly, Soham Sharangpani, Arth Akhouri, Ami Munshi, and Svkms Nmims. 2020. "Review of Data Privacy Laws and Case Study." 8(10):2923-27.
34. Campbell, Chrisann. 2021. "A Review of Data Protection Regulations and the Right to Privacy: A Review of Data Protection Regulations and the Right to Privacy: The Case of the US and India the Case of the US and India."
35. Cobb, Stephen. 2016. "Data Privacy and Data Protection: US Law and Legislation." *Eset* (April):1-16.
36. Dr. Ajay Kumar Garg, and Shikha Kuchhal. 2011. "Data Protection Laws in India: A Comparative Study." *Indian Journal of Applied Research* 3(1):75-76. doi: 10.15373/2249555x/jan2013/30.
37. Gruschka, Nils, Vasileios Mavroeidis, Kamer Vishi, and Meiko Jensen. 2019. "Privacy Issues and Data Protection in Big Data: A Case Study Analysis under GDPR." *Proceedings - 2018 IEEE International Conference on Big Data, Big Data 2018* 5027-33. doi: 10.1109/BigData.2018.8622621.
38. Saravanan, S. Sandesh, and M. Kannappan. 2018. "An Overview of the Changing Data Privacy Landscape in India with Regard to the Role of Data Controllers." *International Journal of Pure and Applied Mathematics* 119(17):919-31.