

SCIENCE
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Ijtimoiy-gumanitar fanlarning dolzarb muammolari

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2025

SCIENCEPROBLEMS.UZ

**IJTIMOIIY-GUMANITAR FANLARNING
DOLZARB MUAMMOLARI**

№ 4 (5) – 2025

**АКТУАЛЬНЫЕ ПРОБЛЕМЫ СОЦИАЛЬНО-
ГУМАНИТАРНЫХ НАУК**

ACTUAL PROBLEMS OF HUMANITIES AND SOCIAL SCIENCES

TOSHKENT-2025

BOSH MUHARRIR:

Isanova Feruza Tulqinovna

TAHRIR HAY'ATI:

07.00.00- TARIX FANLARI:

Yuldashev Anvar Ergashevich – tarix fanlari doktori, siyosiy fanlar nomzodi, professor, O'zbekiston Respublikasi Prezidenti huzuridagi Davlat boshqaruvi akademiyasi;

Mavlanov Uktam Maxmasabirovich – tarix fanlari doktori, professor, O'zbekiston Respublikasi Prezidenti huzuridagi Davlat boshqaruvi akademiyasi;

Xazratkulov Abror – tarix fanlari doktori, dotsent, O'zbekiston davlat jahon tillari universiteti.

Tursunov Ravshan Normuratovich – tarix fanlari doktori, O'zbekiston Milliy Universiteti;

Xolikulov Axmadjon Boymahmatovich – tarix fanlari doktori, O'zbekiston Milliy Universiteti;

Gabrielyan Sofya Ivanovna – tarix fanlari doktori, dotsent, O'zbekiston Milliy Universiteti.

Saidov Sarvar Atabullo o'g'li – katta ilmiy xodim, Imom Termiziy xalqaro ilmiy-tadqiqot markazi, ilmiy tadqiqotlar bo'limi.

08.00.00- IQTISODIYOT FANLARI:

Karlibayeva Raya Xojabayevna – iqtisodiyot fanlari doktori, professor, Toshkent davlat iqtisodiyot universiteti;

Nasirxodjayeva Dilafruz Sabitxanovna – iqtisodiyot fanlari doktori, professor, Toshkent davlat iqtisodiyot universiteti;

Ostonokulov Azamat Abdukarimovich – iqtisodiyot fanlari doktori, professor, Toshkent moliya instituti;

Arabov Nurali Uralovich – iqtisodiyot fanlari doktori, professor, Samarqand davlat universiteti;

Xudoyqulov Sadirdin Karimovich – iqtisodiyot fanlari doktori, dotsent, Toshkent davlat iqtisodiyot universiteti;

Azizov Sherzod O'ktamovich – iqtisodiyot fanlari doktori, dotsent, O'zbekiston Respublikasi Bojxona instituti;

Xojayev Azizxon Saidaloxonovich – iqtisodiyot fanlari doktori, dotsent, Farg'ona politexnika instituti

Xolov Aktam Xatamovich – iqtisodiyot fanlari bo'yicha falsafa doktori (PhD), dotsent, O'zbekiston Respublikasi Prezidenti huzuridagi Davlat boshqaruvi akademiyasi;

Shadiyeva Dildora Xamidovna – iqtisodiyot fanlari bo'yicha falsafa doktori (PhD), dotsent v.b, Toshkent moliya instituti;

Shakarov Qulmat Ashirovich – iqtisodiyot fanlari

nomzodi, dotsent, Toshkent axborot texnologiyalari universiteti

09.00.00- FALSAFA FANLARI:

Hakimov Nazar Hakimovich – falsafa fanlari doktori, professor, Toshkent davlat iqtisodiyot universiteti;

Yaxshilikov Jo'raboy – falsafa fanlari doktori, professor, Samarqand davlat universiteti;

G'aybullayev Otabek Muhammadiyevich – falsafa fanlari doktori, professor, Samarqand davlat chet tillar instituti;

Saidova Kamola Uskanbayevna – falsafa fanlari doktori, "Tashkent International University of Education" xalqaro universiteti;

Hoshimxonov Mo'min – falsafa fanlari doktori, dotsent, Jizzax pedagogika instituti;

O'roqova Oysuluv Jamoliddinovna – falsafa fanlari doktori, dotsent, Andijon davlat tibbiyot instituti, Ijtimoiy-gumanitar fanlar kafedrasini mudiri;

Nosirxodjayeva Gulnora Abdukaxxarovna – falsafa fanlari nomzodi, dotsent, Toshkent davlat yuridik universiteti;

Turdiyev Bexruz Sobirovich – falsafa fanlari bo'yicha falsafa doktori (PhD), dotsent, Buxoro davlat universiteti.

10.00.00- FILOLOGIYA FANLARI:

Axmedov Oybek Saporbayevich – filologiya fanlari doktori, professor, O'zbekiston davlat jahon tillari universiteti;

Ko'chimov Shuxrat Norqizilovich – filologiya fanlari doktori, dotsent, Toshkent davlat yuridik universiteti;

Hasanov Shavkat Ahadovich – filologiya fanlari doktori, professor, Samarqand davlat universiteti;

Baxronova Dilrabo Keldiyorovna – filologiya fanlari doktori, professor, O'zbekiston davlat jahon tillari universiteti;

Mirsanov G'aybullo Qulmurodovich – filologiya fanlari doktori, professor, Samarqand davlat chet tillar instituti;

Salaxutdinova Musharraf Isamutdinovna – filologiya fanlari nomzodi, dotsent, Samarqand davlat universiteti;

Kuchkarov Raxman Urmanovich – filologiya fanlari nomzodi, dotsent v/b, Toshkent davlat yuridik universiteti;

Yunusov Mansur Abdullayevich – filologiya fanlari nomzodi, O'zbekiston Respublikasi Prezidenti huzuridagi Davlat boshqaruvi akademiyasi;

Saidov Ulugbek Aripovich – filologiya fanlari nomzodi, dotsent, O'zbekiston Respublikasi Prezidenti huzuridagi Davlat boshqaruvi akademiyasi.

12.00.00- YURIDIK FANLAR:

Axmedshayeva Mavlyuda Axatovna – yuridik fanlar doktori, professor, Toshkent davlat yuridik universiteti;

Muxitdinova Firyuza Abdurashidovna – yuridik fanlar doktori, professor, Toshkent davlat yuridik universiteti;

Esanova Zamira Normurotovna – yuridik fanlar doktori, professor, O'zbekiston Respublikasida xizmat ko'rsatgan yurist, Toshkent davlat yuridik universiteti;

Hamroqulov Bahodir Mamasharifovich – yuridik fanlar doktori, professor v.b., Jahon iqtisodiyoti va diplomatiya universiteti;

Zulfiqorov Sherzod Xurramovich – yuridik fanlar doktori, professor, O'zbekiston Respublikasi Jamoat xavfsizligi universiteti;

Xayitov Xushvaqt Saparbayevich – yuridik fanlar doktori, professor, O'zbekiston Respublikasi Prezidenti huzuridagi Davlat boshqaruvi akademiyasi;

Asadov Shavkat G'aybullayevich – yuridik fanlar doktori, dotsent, O'zbekiston Respublikasi Prezidenti huzuridagi Davlat boshqaruvi akademiyasi;

Ergashev Ikrom Abdurasulovich – yuridik fanlari doktori, professor, Toshkent davlat yuridik universiteti;

Utemuratov Maxmut Ajimuratovich – yuridik fanlar nomzodi, professor, Toshkent davlat yuridik universiteti;

Saydullayev Shaxzod Alixanovich – yuridik fanlar nomzodi, professor, Toshkent davlat yuridik universiteti;

Hakimov Komil Baxtiyarovich – yuridik fanlar doktori, dotsent, Toshkent davlat yuridik universiteti;

Yusupov Sardorbek Baxodirovich – yuridik fanlar doktori, dotsent, Toshkent davlat yuridik universiteti;

Amirov Zafar Aktamovich – yuridik fanlar doktori (PhD), O'zbekiston Respublikasi Sudyalari oliy kengashi huzuridagi Sudyalari oliy maktabi;

Jo'rayev Sherzod Yuldashevich – yuridik fanlar nomzodi, dotsent, Toshkent davlat yuridik universiteti;

Babadjanov Atabek Davronbekovich – yuridik fanlar nomzodi, dotsent, Toshkent davlat yuridik universiteti;

Normatov Bekzod Akrom o'g'li — yuridik fanlar bo'yicha falsafa doktori, Toshkent davlat yuridik universiteti;

Rahmatov Elyor Jumaboyevich — yuridik fanlar nomzodi, Toshkent davlat yuridik universiteti;

13.00.00- PEDAGOGIKA FANLARI:

Xashimova Dildarxon Urinboyevna – pedagogika fanlari doktori, professor, Toshkent davlat yuridik universiteti;

Ibragimova Gulnora Xavazmatovna – pedagogika fanlari doktori, professor, Toshkent davlat iqtisodiyot universiteti;

Zakirova Feruza Maxmudovna – pedagogika fanlari doktori, Toshkent axborot texnologiyalari universiteti huzuridagi pedagogik kadrlarni qayta tayyorlash va ularning malakasini oshirish tarmoq markazi;

Kayumova Nasiba Ashurovna – pedagogika fanlari doktori, professor, Qarshi davlat universiteti;

Taylanova Shoxida Zayniyevna – pedagogika fanlari doktori, dotsent;

Jumaniyozova Muhayyo Tojiyevna – pedagogika fanlari doktori, dotsent, O'zbekiston davlat jahon tillari universiteti;

Ibraximov Sanjar Urunbayevich – pedagogika fanlari doktori, Iqtisodiyot va pedagogika universiteti;

Javliyeva Shaxnoza Baxodirovna – pedagogika fanlari bo'yicha falsafa doktori (PhD), Samarqand davlat universiteti;

Bobomurotova Latofat Elmurodovna — pedagogika fanlari bo'yicha falsafa doktori (PhD), Samarqand davlat universiteti.

19.00.00- PSIXOLOGIYA FANLARI:

Karimova Vasila Mamanosirovna – psixologiya fanlari doktori, professor, Nizomiy nomidagi Toshkent davlat pedagogika universiteti;

Hayitov Oybek Eshboyevich – Jismoniy tarbiya va sport bo'yicha mutaxassislarni qayta tayyorlash va malakasini oshirish instituti, psixologiya fanlari doktori, professor

Umarova Navbahor Shokirovna– psixologiya fanlari doktori, dotsent, Nizomiy nomidagi Toshkent davlat pedagogika universiteti, Amaliy psixologiyasi kafedrasi mudiri;

Atabayeva Nargis Batirovna – psixologiya fanlari doktori, dotsent, Nizomiy nomidagi Toshkent davlat pedagogika universiteti;

Shamshetova Anjim Karamaddinovna – psixologiya fanlari doktori, dotsent, O'zbekiston davlat jahon tillari universiteti;

Qodirov Obid Safarovich – psixologiya fanlari doktori (PhD), Samarkand viloyat IIB Tibbiyot bo'limi psixologik xizmat boshlig'i.

22.00.00- SOTSILOGIYA FANLARI:

Latipova Nodira Muxtarjanovna – sotsiologiya fanlari doktori, professor, O'zbekiston milliy universiteti kafedra mudiri;

Seitov Azamat Po'latovich – sotsiologiya fanlari doktori, professor, O'zbekiston milliy universiteti;

Sodiqova Shohida Marxaboyevna – sotsiologiya fanlari doktori, professor, O'zbekiston xalqaro islom akademiyasi.

23.00.00- SIYOSIY FANLAR

Nazarov Nasriddin Ataqulovich –siyosiy fanlar doktori, falsafa fanlari doktori, professor, Toshkent arxitektura qurilish instituti;

Bo'tayev Usmonjon Xayrullayevich –siyosiy fanlar doktori, dotsent, O'zbekiston milliy universiteti kafedra mudiri.

OAK Ro'yxati

Mazkur jurnal Vazirlar Mahkamasi huzuridagi Oliy attestatsiya komissiyasi Rayosatining 2022-yil 30-noyabrda 327/5-son qarori bilan tarix, iqtisodiyot, falsafa, filologiya, yuridik va pedagogika fanlari bo'yicha ilmiy darajalar yuzasidan dissertatsiyalar asosiy natijalarini chop etish tavsiya etilgan ilmiy nashrlar ro'yxatiga kiritilgan.

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MUNDARIJA

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RESEARCH ON LEGAL ISSUES OF PERSONAL INFORMATION PROTECTION

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Abstract. Citizens' personal information, closely related to various elements of society such as politics and economy, has a profound impact on social development and is an important social resource. However, the advancement of network technology has led to an increasing number of personal information leaks, which urgently need to be addressed. This article focuses on the legal issues of personal information protection, explores the definition of personal information and its relationship with related concepts such as personal privacy and personal data. Through comparative analysis of personal information protection legal systems in China, the European Union, the United States, Russia, and other countries, the article particularly examines the relevant legislation and practices in Uzbekistan. The study finds that while there are differences in personal information protection across countries, all face new challenges brought by technological development. It is recommended to improve Uzbekistan's personal information protection legal system, strengthen international cooperation, and raise public awareness to meet the demands of personal information protection in the digital age.

Keywords: Personal Information Protection; Comparative Law; Legal Regulation.

SHAXSIY MA'LUMOTLARNI HIMOYA QILISHNING HUQUQIY MASALALARI BO'YICHA TADQIQOT

Vang Tzun

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Annotatsiya. Fuqarolarning shaxsiy ma'lumotlari, siyosat va iqtisodiyot kabi jamiyatning turli elementlari bilan chambarchas bog'liq bo'lib, ijtimoiy rivojlanishga chuqur ta'sir ko'rsatadi va muhim ijtimoiy resurs hisoblanadi. Biroq, tarmoq texnologiyalarining rivojlanishi shaxsiy ma'lumotlarning oshkor bo'lishi holatlarining ko'payishiga olib keldi, bu esa tezda hal etilishi zarur. Ushbu maqola shaxsiy ma'lumotlarni himoya qilishning huquqiy masalalariga e'tibor qaratadi, shaxsiy ma'lumotlarning ta'rifini va uning shaxsiy maxfiylik va shaxsiy ma'lumotlar kabi tegishli tushunchalar bilan bog'liqligini o'rganadi. Xitoy, Yevropa Ittifoqi, Amerika Qo'shma Shtatlari, Rossiya va boshqa mamlakatlardagi shaxsiy ma'lumotlarni himoya qilish huquqiy tizimlarini taqqosli tahlil qilish orqali maqola O'zbekistondagi tegishli qonunlar va amaliyotlarni alohida ko'rib chiqadi. Tadqiqot shuni ko'rsatadiki, mamlakatlar o'rtasida shaxsiy ma'lumotlarni himoya qilishda farqlar mavjud bo'lsa-da, barchasi texnologik rivojlanishdan kelib chiqadigan yangi muammolar bilan yuzma-yuz kelmoqda. O'zbekistonda shaxsiy ma'lumotlarni himoya qilish huquqiy tizimini takomillashtirish, xalqaro hamkorlikni kuchaytirish va jamoatchilikning xabardorligini oshirish tavsiya etiladi, bu esa raqamli davrda shaxsiy ma'lumotlarni himoya qilish talablari bilan javob berish uchun zarur.

Kalit so'zlar: shaxsiy ma'lumotlarni himoya qilish; taqqosiy huquq; huquqiy taqiqlash.

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INTRODUCTION

With the rapid development of information technology, personal information protection has become a significant legal issue of global concern. In the digital age, the collection, storage, processing, and transmission of personal information have become increasingly convenient, but they also bring numerous security risks and privacy concerns. This study aims to explore the legal regulation of personal information protection, providing references for improving Uzbekistan's personal information protection system through comparative analysis of legal systems in different countries and regions.

This article employs literature research and comparative analysis methods. It first defines the concept of personal information and discusses its relationship with related concepts such as personal privacy and personal data. Subsequently, the article systematically reviews the personal information protection legal systems in China, the European Union, the United States, and Russia, with a focus on analyzing relevant legislation and practices in Uzbekistan. Finally, the article summarizes the research findings and proposes recommendations for improving Uzbekistan's personal information protection legal system.

ANALYSIS AND RESULTS

1. Personal Information Definition and Classification

Personal information refers to various types of information that can identify a specific natural person, either alone or in combination with other information. It includes but is not limited to name, ID number, contact information, biometric data, etc. The core characteristic of personal information is identifiability, meaning it can directly or indirectly identify a specific individual. [1] Based on the sensitivity of the information, personal information can be classified into the following categories:

General Personal Information: Such as name, gender, contact information, etc. These types of information usually do not involve the core areas of personal privacy.

Sensitive Personal Information: Such as race, religious beliefs, health information, biometric information, etc. The leakage of such information may have significant impacts on individuals.

Special Categories of Personal Information: Such as children's information, financial information, etc. These types of information receive special protection due to the Specific characteristics of the subjects or the sensitivity of the application scenarios.

Personal information is closely related to concepts such as personal privacy and personal data but also has distinctions. Personal privacy emphasizes the undisturbed and secretive aspects of personal life, while personal information focuses more on identifiability. Personal data is the digital representation of personal information, emphasizing the electronic characteristics of the information. In practice, these concepts are often used interchangeably, but they differ in the scope and methods of legal protection. [2]

Personal Privacy: Emphasizes the undisturbed and secretive aspects of personal life, typically involving private areas that individuals do not wish to disclose. For example, family life and communication content fall under the category of privacy.

Personal Data: Refers to the digital representation of personal information, emphasizing the electronic characteristics of the information. For example, user behavior data stored in databases is considered personal data.

Personal Information: Focuses more on the identifiability of the information, regardless of whether it involves privacy or exists in electronic form. For example, publicly available name and job title information, while not involving privacy, still constitute personal information.

International organizations provide important references for the definition and classification of personal information:

OECD: Defines personal information as "any information relating to an identified or identifiable individual." [3]

APEC: In the Privacy Framework, defines personal information as "any information about an identified or identifiable individual." [4]

United Nations: In the Report on Privacy in the Digital Age, emphasizes that the protection of personal information should balance technological advancement and privacy rights.

Conclusion: Through the above analysis, it is evident that the concept of personal information has different emphases in different contexts, but its core characteristic is identifiability. In legislation and practice, clarifying the scope and classification of personal information is the foundation for protecting personal information. [5]

2. China's Legislative Practices

China has made significant progress in personal information protection legislation in recent years. The Personal Information Protection Law of the People's Republic of China was officially implemented in 2021, marking the basic establishment of China's personal information protection legal system. The law clarifies the basic principles of personal information processing, such as legality, legitimacy, and necessity, stipulates the obligations of personal information processors, and grants individuals a series of rights, such as the right to know, the right to consent, the right to access, etc.

The distinctive feature of China's personal information protection legal system lies in its emphasis on balancing national interests, social public interests, and individual rights. The law not only focuses on the protection of personal information but also considers the needs of digital economic development. Additionally, China has established a cybersecurity review system to provide special protection for personal information collected and processed by critical information infrastructure operators. However, China still faces challenges in enforcement mechanisms and cross-border data flow regulations, which need further improvement.

The Personal Information Protection Law defines the basic principles of personal information processing, such as legality, legitimacy, and necessity, requiring that personal information processing must have a clear purpose and sufficient basis; it stipulates the obligations of personal information processors, such as security protection obligations and data breach notification obligations, requiring processors to take technical and managerial measures to protect personal information security; it stipulates the protection of individual rights, granting individuals the right to know, the right to consent, the right to access, the right to correct, the right to delete, etc., ensuring individuals' control over their information; it also specifically regulates cross-border data flow, requiring that the provision of personal information to overseas entities must meet specific conditions, such as passing a security assessment or obtaining separate consent from the individual.

The distinctive feature of China's personal information protection legal system lies in its emphasis on balancing national interests, social public interests, and individual rights. The cybersecurity review system and data classification and hierarchical management provide special protection for personal information collected and processed by critical information infrastructure operators, ensuring national security. Data is classified and managed according to its importance and sensitivity, improving protection efficiency. Additionally, industry self-regulation is combined with government supervision, encouraging industry associations to formulate self-regulatory norms while strengthening government supervision and enforcement.

After the enactment of the Personal Information Protection Law, the "first facial recognition case" in Hangzhou is of typical significance. A zoo in Hangzhou was sued for forcing visitors to use facial recognition to enter the park, and the court ruled that the zoo violated the visitors' personal information rights. This case clarified the legal status of facial information as sensitive personal information. Another case involved a data breach on an e-commerce platform, where the platform was fined and ordered to rectify due to its failure to fulfill security protection obligations, resulting in user data leakage. This case highlighted the legal responsibilities of personal information processors.

Despite significant progress in personal information protection, China still faces the following challenges:

Inadequate enforcement mechanisms: Regulatory authorities face resource shortages and limited technical capabilities during enforcement.

Unclear cross-border data flow rules: Enterprises face compliance risks in cross-border data transmission.

Many individuals have limited understanding and awareness of their information rights and protection.

Through the above analysis, it is evident that China's personal information protection legal system has been initially established, but further improvements are needed during implementation.

3. Comparative Analysis of Legislation in the EU, the US, and Russia

European Union: Unified Legislation and High-Standard Protection

The European Union is at the forefront of global personal information protection, with the General Data Protection Regulation (GDPR) as its core law. The GDPR, centered on the concept of "personal data," emphasizes the protection of data subjects' rights and establishes strict data processing rules and cross-border data transfer mechanisms. Its characteristics include unified legislation, high-standard protection, and strong enforcement, which have had a profound impact on global personal information protection legislation. [6]

Legislative Framework: The European Union is at the forefront of global personal information protection, with the General Data Protection Regulation (GDPR) as its core law. The GDPR, which came into effect in May 2018, replaced the 1995 Data Protection Directive and became the unified legal framework for personal information protection within the EU. The GDPR, centered on the concept of "personal data," emphasizes the protection of data subjects' rights and establishes strict data processing rules and cross-border data transfer mechanisms.

Main Features.

Unified Legislation: The GDPR applies to all EU member states, eliminating legislative differences among countries and providing a unified compliance standard for enterprises.

High-Standard Protection: The GDPR stipulates strict data processing principles, such as legality, transparency, purpose limitation, and data minimization.

Data Subject Rights: The GDPR grants individuals a series of rights, including the right to know, the right to access, the right to correct, the right to delete (right to be forgotten), and the right to data portability.

Cross-Border Data Transfer Rules: The GDPR sets strict conditions for transferring personal data to non-EU countries, such as through adequacy decisions or standard contractual clauses.

Strong Enforcement: The GDPR imposes high fines (up to 4% of global turnover or €20 million, whichever is higher) and establishes independent data protection authorities (DPAs) responsible for enforcement.

In 2019, the French data protection authority fined Google €50 million for failing to adequately inform users about how their data was used for personalized advertising. This case was the first penalty decision made by the French regulatory authority after the GDPR came into effect on May 25, 2018. This case not only marked the strengthening of GDPR enforcement by EU regulatory authorities but also provided effective references for other countries regarding user personal data infringement disputes. [7]

United States: Decentralized Legislation and Industry Self-Regulation

The United States adopts a decentralized legislative model, primarily relying on industry self-regulation and sector-specific legislation to protect personal information. Its core laws include the Privacy Act, the Children's Online Privacy Protection Act, etc. The US model emphasizes flexibility and industry autonomy but lacks uniformity and protection strength. In recent years, state-level legislation such as California's Consumer Privacy Act (CCPA) has shown a trend toward strengthening personal information protection.

The core laws in the United States include the Privacy Act (1974), the Children's Online Privacy Protection Act (COPPA, 1998), and the Health Insurance Portability and Accountability Act (HIPAA, 1996). [10] In recent years, state-level legislation such as California's Consumer Privacy Act (CCPA, 2020) and the California Privacy Rights Act (CPRA, 2023) has shown a trend toward strengthening personal information protection. [8]

Main Features:

Decentralized Legislation: The US lacks a unified personal information protection law, instead enacting sector-specific laws for different industries and fields.

Industry Self-Regulation: The US emphasizes industry self-regulation, encouraging enterprises to formulate privacy policies and codes of conduct.

Flexibility: The decentralized legislative model allows laws to flexibly adapt to the needs of different industries but also results in uneven protection strength.

State-Level Legislation: State-level laws such as California's CCPA and CPRA provide references for other states and may promote the process of federal-level unified legislation. [9]

In 2018, Facebook was investigated for the Cambridge Analytica data breach and ultimately fined 5 billion. In 2017, the credit reporting agency Equifax was fined 5 billion. In 2017, the credit reporting agency Equifax was fined 700 million for a data breach. [10]

Russia: Strict Legislation and Data Localization

Russia has adopted a relatively strict legislative approach to personal information protection. The Russian Federal Personal Data Law stipulates the basic principles of personal information processing and requires data controllers to store Russian citizens' personal information on domestic servers. This data localization requirement reflects Russia's high regard for personal information sovereignty but also conflicts with international data flow rules.

Russia has adopted a relatively strict legislative approach to personal information protection, with the Russian Federal Personal Data Law (2006) as its core law. The law stipulates the basic principles of personal information processing and requires data controllers to store Russian citizens' personal information on domestic servers. [11]

Main Features:

Data Localization: Russia requires data controllers to store Russian citizens' personal information on domestic servers to ensure data sovereignty.

Strict Supervision: Russia has established the Federal Service for Supervision of Communications, Information Technology, and Mass Media (Roskomnadzor) to enforce and supervise personal information protection.

High Fines: Russia imposes high fines for violations of personal information protection laws (up to 6 million rubles).

Limited International Cooperation: The data localization requirement creates conflicts between Russia and international rules regarding cross-border data flows. [12]

In 2016, LinkedIn was banned in Russia for failing to comply with data localization requirements. [13] In 2021, Google was fined 3 million rubles by Russia for failing to delete prohibited content, which is also a typical case.

Conclusion: In summary, the EU, the US, and Russia differ in legislative models, implementation mechanisms, and cross-border data flows, each with its own characteristics.

Legislative Models: The EU adopts unified legislation with high-standard protection and strong enforcement; the US adopts decentralized legislation with industry self-regulation and high flexibility; Russia adopts strict legislation with data localization, emphasizing data sovereignty.

Implementation Mechanisms: The EU establishes independent data protection authorities (DPAs) and imposes high fines; the US relies on industry self-regulation and state-level legislation, with the Federal Trade Commission (FTC) responsible for enforcement; Russia's Federal Service for Supervision of Communications, Information Technology, and Mass Media (Roskomnadzor) is responsible for enforcement and also imposes high fines for deterrence.

Cross-Border Data Flows: The EU achieves cross-border data transfers through adequacy decisions or standard contractual clauses; the US relies on industry self-regulation and bilateral agreements, lacking unified rules; Russia's data localization requirement restricts cross-border data flows.

Through the above comparison, it is evident that the EU, the US, and Russia have adopted different legislative models and implementation mechanisms in personal information protection, reflecting their respective legal traditions and practical needs. The EU's unified legislation and high-standard protection provide a global reference; the US's decentralized

legislation and industry self-regulation model offer flexibility; Russia's strict legislation and data localization requirement reflect a high regard for data sovereignty. [14]

4. Research on Personal Information Protection Legal Issues in Uzbekistan

Uzbekistan has not yet enacted a specialized Personal Information Protection Law, but relevant provisions on personal information protection are scattered across multiple laws. For example, Article 27 of the Constitution of the Republic of Uzbekistan stipulates the protection of citizens' privacy rights. The Information Law of the Republic of Uzbekistan provides general provisions on the collection, storage, and use of personal information. Additionally, the Criminal Code of the Republic of Uzbekistan includes penalties for violations of personal privacy.[15]

Despite the lack of a unified personal information protection law, Uzbekistan has made some progress in related fields. For instance, the country passed the E-Government Law in 2018, which includes provisions on the protection of citizens' electronic data. Meanwhile, Uzbekistan is actively participating in international data protection cooperation,[16]such as joining the Budapest Convention on Cybercrime and other international treaties.

However, Uzbekistan's personal information protection system still faces numerous challenges. First, the decentralized legislative model leads to uncertainty in legal application, making it difficult to form a unified protection standard. Second, the enforcement mechanism is not yet perfect, lacking specialized regulatory agencies. Third, public awareness of personal information protection is relatively weak, and enterprises and institutions need time to adapt to relevant legal requirements. Finally, in terms of cross-border data flows and international cooperation, Uzbekistan needs to further clarify rules and strengthen coordination.

Conclusion

With the development of emerging technologies such as artificial intelligence, blockchain, and the Internet of Things, personal information protection faces new challenges. The widespread application of AI technology makes the collection and processing of personal information more conceal, increasing the risk of privacy leaks; blockchain technology, while decentralized and tamper-proof, may conflict with personal information protection due to its transparent nature; the proliferation of smart devices has expanded the scope of personal information collection, making the protection of such information a new challenge. Personal information protection has become a global issue, and countries are striving to improve relevant legal systems.[17] Different countries and regions have adopted various legislative models in personal information protection, reflecting their respective legal traditions and practical needs. Uzbekistan still needs to strengthen its personal information protection legislation, seeking a balance between protecting individual rights and promoting digital economic development, while strengthening cooperation with the international community. It is necessary to enact a specialized Personal Information Protection Law to meet the challenges of the digital age.

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