





The Right to be Forgotten: Is it Spreading? Abu Bakar Munir, Faculty of Law, University of Malaya, Malaysia Siti Hajar Mohd Yasin Faculty of Law, Universiti Teknologi MARA, Malaysia

To implement the European Court of Justice's decision on the right to be forgotten (RTBF), the Working Party concluded that limiting delisting to EU domains cannot be considered as sufficient means to satisfy the ruling. The adequate implementation of the decision, according to the Working Party, must be made in such a way that the data subjects are effectively protected against the impact of the universal dissemination and accessibility of personal information offered by search engines. This means that in any case delisting should also be effective on all relevant domains, including .com. Conversely, the Google advisory group recommended, based on the principles of proportionality and practical effectiveness, that the removal from nationally directed version of Google's search services within the EU is the appropriate means to implement the ruling. The Google Global Privacy Counsel argues that a global implementation of the RTBF would have a "chilling" effect on the Internet. He says, "While the RTBF may now be the law in Europe, it is, not the law globally." This paper seeks to debate the expansion of this right beyond the Europe. For that, the developments in countries such as Russia, Japan and Hong Kong will be deliberated.

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