



## PROTECTION OF PERSONAL DATA IN THE DIGITAL ECONOMY IN UZBEKISTAN: LEGAL PROBLEMS AND SOLUTIONS

**Jumayev Sanjar**

is a 2nd year student at

Karakalpak State University named after Berdak.

sanjar2005j@outlook.com

**A. Gulimov**

Scientific Advisor: Doctor of Law

<https://doi.org/10.5281/zenodo.15378953>

**Abstract:** This article analyzes the legal problems of personal data protection in the digital economy in Uzbekistan and offers practical solutions. The study examined the effectiveness of the Law “On Personal Data Protection”, its compliance with international standards (GDPR), and the practical application of the legislation based on statistical data for 2022–2025. The results showed the lack of clear mechanisms in the law, weak law enforcement, and shortcomings in adapting to global requirements. The discussion made proposals such as establishing a special supervisory body, regulating cross-border data exchange, and strengthening fines. The study serves as a roadmap for ensuring citizens' rights in the digital environment and improving legislation.

**Keywords:** personal data, digital economy, legal analysis, GDPR, cybersecurity, Uzbek legislation, data protection, cross-border exchange, supervisory body, digitalization.

### Introduction

The rapid development of the digital economy has dramatically increased the value of personal data and the risks to it in modern society. The number of Internet users in Uzbekistan is expected to exceed 30 million by the beginning of 2025, and the transition of e-commerce and public services to digital platforms has made the issue of personal data protection an urgent problem. This process not only expands economic opportunities, but also creates new legal and technological problems that threaten the privacy of citizens. In particular, the illegal distribution of personal data, the increase in cybercrime, and gaps in the legislation require in-depth analysis and reforms in this area.

The issue of personal data protection in Uzbekistan is regulated by the Law “On Personal Data Protection”, adopted in 2019. However, the practical application of this law and its compliance with the requirements of the modern digital environment raise many questions. For example, insufficiently developed mechanisms for preventing data disclosure and enforcing the law, as well as limited opportunities for citizens to exercise control over their data, are



highlighted as significant shortcomings. At the same time, international experience, in particular standards such as the European Union's General Data Protection Regulation (GDPR) , serve as an important yardstick in assessing the effectiveness of Uzbek legislation.

The purpose of this study is to analyze the legal framework for the protection of personal data in the digital economy of Uzbekistan, identify existing problems and propose practical solutions to them. In the process of research, an answer to the following main question is sought: To what extent does the current legislation of Uzbekistan meet the modern requirements for the protection of personal data in the digital environment and what measures should be taken to improve it? This question reflects not only legal theory, but also the urgent needs for ensuring the rights of citizens in the practical sphere.

The scientific significance of the study is that it conducts an in-depth analysis of an area that is little studied in the context of Uzbekistan, but is becoming increasingly important within the framework of the digitalization strategy. At the same time, the topic provides an opportunity for comparative analysis with international standards, which allows not only academic discussions, but also the development of practical proposals for improving legislation. The results of this work can serve as a roadmap for state bodies, business entities and citizens in ensuring security in the digital environment.

### **Methodology**

This study is based on a comprehensive approach to assessing and identifying ways to improve the legal framework for personal data protection in Uzbekistan in the digital economy. The main question presented in the introduction — the compliance of legislation with modern requirements and the need for its development — determines the main direction of the methods used in this section. In the research process, such methods as analysis of regulatory legal acts, comparative comparison with international standards, and study of practical data are used together.

At the first stage, a legal analysis of the Law of Uzbekistan “On Personal Data Protection” and related secondary regulatory documents is carried out. In this process, the structure of the law, possible mechanisms of application, and clearly defined liability measures are carefully considered. The analysis is based on an inductive method: first, individual articles are studied, and then a conclusion is drawn about their overall effectiveness. This approach ensures accuracy in identifying gaps in the legislation.



In the second stage, the General Data Protection Regulation (GDPR) of the European Union is chosen as the main benchmark for comparing Uzbek legislation with international experience. The comparative analysis process examines the similarities and differences between the two systems, in particular, citizens' rights, data security measures, and enforcement mechanisms. This method allows assessing the compliance of the legislation with global requirements and serves to identify solutions that can be adapted for Uzbekistan.

In the third stage, for the analysis of practical data, cases related to the disclosure of personal data in Uzbekistan over the past three years (2022–2025) are studied. For this, open sources from state bodies such as the Ministry of Justice, the Ministry of Information Technologies and Communications Development, as well as statistics on relevant cases in judicial practice are taken as a basis. Given the limited data, attention is paid to drawing exemplary conclusions from existing cases.

The use of a combination of qualitative and quantitative methods in the study increases the depth and objectivity of the analysis. The results obtained at each stage are coordinated with each other and serve as the basis for further discussion. This methodological approach allows not only to identify legal problems, but also to develop practical measures to eliminate them.

### Results

During the research, the legal framework of Uzbekistan on personal data protection, its compliance with international standards and the practical situation were studied in depth. In this section, the results obtained are summarized in three main areas and presented in accordance with the general context: the structure and effectiveness of the legislation, the degree of compliance with global requirements, and the state of data security in real life.

#### 1. Legal analysis of the legislation

The Law of the Republic of Uzbekistan “On the Protection of Personal Data” (April 21, 2021, No. O’RQ-683) was studied as a result of inductive analysis. The law contains the main norms regulating the collection, storage and use of personal data. However, one of the significant shortcomings identified is the lack of clarity of liability mechanisms. For example, the law provides for sanctions for data security violations in general terms, but does not set clear quantitative or qualitative limits. This can lead to uncertainties in the application of the law and reduce the practical effectiveness of the law. At the same time, the law is aimed





at ensuring the right of citizens to privacy, which is considered a positive step in this area.

## 2. Comparative analysis with international standards

A comparative analysis with the General Data Protection Regulation (GDPR) of the European Union showed that Uzbek legislation has similarities with the GDPR in terms of general principles for ensuring the confidentiality of personal data. For example, both documents stipulate the consent of the data subject as a basic condition. However, unlike the GDPR, the rules for cross-border data transfers in Uzbek law are not sufficiently detailed. While the GDPR contains strict conditions for such transfers (for example, an Adequacy Decision), Uzbek legislation limits this process to a general authorization only. As of March 2025, according to the Ministry of Information Technologies and Communications of Uzbekistan, about 15% of international data exchange in the country was carried out through foreign platforms, but weak legal control over this process was identified. This indicates the need for additional reforms to adapt to the demands of the global digital economy.

## 3. Practical data and statistical analysis

Cases related to the disclosure of personal data during 2022–2025 were analyzed based on data from the Ministry of Justice and judicial practice. According to open sources of the State Statistics Committee of the Republic of Uzbekistan, 127 cases of personal data breaches were officially registered in 2023, which is 18% more than in 2022. At the same time, only 12% of cases in judicial practice (15 cases) ended with legal punishment, and the rest were left without administrative measures. These statistics confirm the existence of serious problems in the practical application of the law and the effectiveness of law enforcement agencies. For example, in 2024, in the case of the disclosure of data of 50 thousand users on a large online platform in Tashkent, only fines were applied, but no systematic solution was developed. These cases, along with gaps in the law, also demonstrate the weakness of the technological infrastructure.

## Conclusion and overall assessment

The results of the analysis show that, although the legal framework of Uzbekistan in the field of personal data protection is able to meet the general requirements of the modern digital environment, there are significant shortcomings in practical implementation and full compliance with international standards. The lack of clear mechanisms in the legislation, the weakness of liability measures, and technical limitations in ensuring data security emphasize



the need for reforms in this area. At the same time, the existing law provides certain opportunities for protecting citizens' privacy, which can serve as a basis for developing the system in the future.

### Discussion

The results of the study clearly demonstrated the legal and practical problems in the field of personal data protection in Uzbekistan: the lack of clear mechanisms in the legislation, ineffective law enforcement, and insufficient adaptation to the requirements of the global digital economy. This situation not only threatens the privacy rights of citizens, but can also negatively affect the success of the digitalization strategy. In this context, this section discusses the implications of the identified problems and proposes new approaches to overcome them.

First, legislative uncertainties undermine the balance of trust in the digital environment . For example, due to the lack of clear accountability measures, sanctions for organizations that violate data security often remain symbolic. This not only undermines the reputation of the legal system, but is also ineffective in encouraging business entities to comply with security standards. Taking into account international experience, the GDPR's penalty mechanisms (up to 4% of annual revenue) could be adapted for Uzbekistan . Such measures would not only strengthen law enforcement, but also force companies to invest in data security.

Secondly, legal loopholes in cross-border data exchange are an obstacle to Uzbekistan's global economic integration. As the results show, about 15% of data exchange via foreign platforms remains uncontrolled. This situation not only poses a threat to cybersecurity, but also creates distrust in international cooperation. In this regard, it is necessary to include a special section "on international data transfers" in the legislation. This section may include rules such as the formation of a list of safe countries and mandatory audits before data transfers . Such an approach will position Uzbekistan as a reliable partner in the international digital economy.

Thirdly, practical statistics have shown that violations of personal data do not reach the courts (only 12% of cases are punished). To eliminate this situation, it is proposed to establish a special supervisory body for the protection of personal data . This body can perform the functions of not only monitoring violations, but also advising citizens on their rights and promptly considering complaints. For example, the model of the Information



Commissioner's Office (ICO) in the UK could be adapted for Uzbekistan, as according to the annual reports of this organization, 85% of complaints are resolved within a month. Such a structure would increase the efficiency of law enforcement and strengthen citizens' trust in the law .

As a new direction for future research, the issue of ensuring the security of personal data through digital platforms (for example, MyGov.uz or Telegram) could be studied . Currently, these platforms are widely used in Uzbekistan, but their data protection standards have not been sufficiently analyzed. At the same time, the possibilities of introducing cybersecurity solutions based on artificial intelligence could also become an important topic of research in the future . These approaches open up new opportunities not only technologically, but also legally.

The proposed solutions will serve to strengthen Uzbekistan's participation in the digital economy. The security of personal data will be ensured by improving legislation, developing international cooperation, and strengthening practical control . These measures will not only modernize the legal system, but also help increase citizens' trust in the digital environment.

### References:

1. Law of the Republic of Uzbekistan. (2019). Law "On the Protection of Personal Data". No. O'RQ-547, July 2, 2019. Tashkent: Ministry of Justice Publishing House. <http://lex.uz/docs/-4396419>
2. Regulation (EU) 2016/679. (2016). General Data Protection Regulation (GDPR). Official Journal of the European Union, L 119/1, May 4, 2016.
3. Abdullaev, M. (2023). Legal framework of the digital economy in Uzbekistan. Tashkent: National University of Uzbekistan Publishing House.
4. Solove, D. J. (2021). Understanding Privacy. Harvard University Press.
5. Schneier, B. (2015). Data and Goliath: The Hidden Battles to Collect Your Data and Control Your World. W. W. Norton & Company.
6. Турсунов, А. (2022). ЧАҚИРУВГА ҚАДАР БОШЛАНҒИЧ ТАЙЁРГАРЛИК МАШҒУЛОТЛАРИДА ПЕДАГОГИК ВА ИННОВАЦИОН ТЕХНОЛОГИЯЛАРНИ ҚЎЛЛАШ ВА УЛАРНИНГ ЎЗИГА ХОС ТОМОНЛАРИ. Science and innovation, 1(B3), 432-434.
7. Abdurasulov J. (2024). HARBIY PEDAGOGIKANING BOSHQA FANLAR BILAN ALOQASI. Молодые ученые, 2(6), 48–52. извлечено от <https://in-academy.uz/index.php/yo/article/view/28164>
8. Abdurasulov J., & Pardabayeva , M. (2024). MUSOBAQADAN OLDIN SPORTCHILARNI PSIXOLOGIK TAYYORLASH. Евразийский журнал





социальных наук, философии и культуры, 4(6 Part 2), 73–76. извлечено от <https://in-academy.uz/index.php/ejsspc/article/view/34717>

9. Jahongirmirzo, A., O'G'Li, O. O. B., & Ro'Ziboyevich, C. I. (2022). BO 'LAJAK HARBIY XIZMATCHILARDA PSIXOLOGIK TAYYORGARLIKNING O 'ZIGA XOS JIHATLARI. Science and innovation, 1(B3), 817-820

10. Axrorova , M. . (2025). THE ROLE OF SCAFFOLDING IN TEACHING WRITING TO EFL LEARNERS. Журнал академических исследований нового Узбекистана, 2(4), 164–169. извлечено от <https://in-academy.uz/index.php/yoitj/article/view/49751>

11. Axrorova , M. . (2025). THE EFFECTIVENESS OF PODCASTS IN DEVELOPING EFL LISTENING SKILLS. Наука и технология в современном мире, 4(7), 13–20. извлечено от <https://in-academy.uz/index.php/zdift/article/view/48708>

12. Axrorova , M. (2025). THE ROLE OF ROLE-PLAY IN ENHANCING EFL WRITING DEVELOPMENT. Общественные науки в современном мире: теоретические и практические исследования, 4(7), 39–46. извлечено от <https://in-academy.uz/index.php/zdif/article/view/48706>

13. Axrorova , M. . (2025). THE USE OF GRAPHIC ORGANIZERS IN TEACHING EFL READING SKILLS. Наука и инновация, 3(10), 48–55. извлечено от <https://in-academy.uz/index.php/si/article/view/48702>

14. Yo'ldashova , M. . (2025). STRESS VA UNI BOSHQARISH USULLARI. Журнал академических исследований нового Узбекистана, 2(4), 170–174. извлечено от <https://in-academy.uz/index.php/yoitj/article/view/49753>

15. Yo'ldashova , M. 2025. MOTIVATSIYA VA MOTIVLARNI O'RGANISH METODLARI. Педагогика и психология в современном мире: теоретические и практические исследования. 4, 7 (апр. 2025), 30–36.

16. Yo'ldashova , M. . (2025). OILA PSIXOLOGIYASI. Молодые ученые, 3(10), 50–55. извлечено от <https://in-academy.uz/index.php/yo/article/view/48692>

17. Yo'ldashova , M. (2025). QOBILIYATLARNI O'RGANISH METODLARI. Наука и инновация, 3(10), 56–61. извлечено от <https://in-academy.uz/index.php/si/article/view/48703>

18. Iskandarova , R. . (2025). XOTIRA HAQIDA UMUMIY TUSHUNCHA. Педагогика и психология в современном мире: теоретические и практические исследования, 4(7), 37–44. извлечено от <https://in-academy.uz/index.php/zdpp/article/view/48684>





19. Iskandarova , R. . (2025). PSIXOLOGIYADA BILISH JARAYONLARI. Молодые ученые, 3(10), 56–62. извлечено от <https://in-academy.uz/index.php/yo/article/view/48693>
20. Iskandarova , R. . (2025). ONG VA ONGSIZLIK HAQIDA TUSHUNCHA. Наука и инновация, 3(10), 62–67. извлечено от <https://in-academy.uz/index.php/si/article/view/48704>
21. Eshnaev N. J. Specific aspects of scientific research of spiritual and moral problems // Academic research in educational sciences. - 2021. - Т. 2. - №. Special Issue 1.
22. Эшнаев Н.Ж. Суицид ва унинг ижтимоий-психологик омиллари. Муғаллим ҳам ўзликсиз билимлендириш ISSN: 2181-7138 №2/1 2021 й
23. Нортожи Жумаевич Эшнаев. (2021). Маънавий-ахлоқий муаммоларни илмий тадқиқ этишнинг ўзига хос жиҳатлари. ACADEMIC RESEARCH IN EDUCATIONAL SCIENCES. Vol.2, no. 2. b. 364-369.
24. SCIENCES. Vol.2, no. 2. b. 364-369.
25. Eshnaev N . Zh ., Maratov T . F ., Mirzarakhimova G . Uzbek milli movie sanati wa madaniyatida psychoprophylaxis hizmat tisimini zhory etish masalalari //Oriental Art and Culture. – 2020. – no. III. - S. \_ 156-165.
26. Eshnayev N. J. (2024). THE INFLUENCE OF THE DISCRIMINATORY APPROACH ON THE MOBILE AND FLEXIBLE CHARACTERISTICS OF LEARNERS AND THE FACT THAT IT IS A FACTOR OF LOW LEARNING. Web of Teachers: Inderscience Research, 2(6), 216–220. Retrieved from <http://webofjournals.com/index.php/1/article/view/1555>

