

Protection of Personal Information in Government Information Disclosure Based on the Administrative Regulation Perspective

Zhao Yan^{1, *}, Maoying Zhang^{2, a}

¹School of Public Management, Nanjing Audit University, Nanjing, China.

²Anhui Normal University, Wuhu, China.

*Corresponding author e-mail: 1945311795@qq.com; ^a m15983203643@163.com

Abstract. Personal information protection is the focus of data security governance, while government information disclosure is a practical need for government administration in the context of the information age. As a public authority, the government's disclosure of information is effectively regulated by the administrative law. The revised Regulation of the People's Republic of China on the Disclosure of Government Information protects personal information mainly in terms of administrative procedures for seeking consent, administrative supervision of information disclosure departments, and administrative remedies for infringement of personal information. However, it still faces problems such as low level of legislation, irregular enforcement procedures, lack of supervision, and imperfect supervision and remedy systems. The future protection of personal information needs to further improve the path of administrative regulation of government information disclosure, make up for the shortcomings in legislation and supervision, improve the consultation system of prior notification and information disclosure as well as continue to follow the principle of procedural due process.

Keywords: Government information disclosure; Administrative regulation; Informed consent; Personal information protection.

1. Introduction

Government information disclosure is a symbol of the rule of law government in the new era, China's government information disclosure system originated from the first decade after the reform and opening up, although the current government information disclosure system has made a lot of exploration, and achieved certain results. However, with the advent of the information age, the government has not paid much attention to the protection of citizens' personal information while expanding the path of information disclosure, and government infringement incidents such as the "2021 Information Disclosure Incident of a Municipal Government in Hebei Province" have emerged one after another. In the context of big data, the importance of personal information protection for government information disclosure is self-evident -- information about people with public interests such as land compensation is not disclosed and can easily affect the credibility of the government, and if the information is not protected, a series of social problems can arise: unscrupulous traders can resell personal information such as names, ages, and phone numbers for profit; the improper dissemination of personal information of unconfirmed "suspected cases" may cause social panic during the special period of the pandemic prevention and control; etc. How to effectively protect personal information is the direction of further development of the information disclosure system in the future. This paper defines the concept of personal information and government information disclosure by constructing a theoretical framework of administrative regulation, and defines the concept of personal information and government information disclosure based on the perspective of administrative regulation. [1]

2. An Overview of Administrative Regulation Theory and Government Information Disclosure

2.1 Definition of the Concepts of Personal Information and Government Information Disclosure

According to the relevant provisions of Article 4 of the Personal Information Protection Law of the People's Republic of China, personal information mostly refers to information that can identify a natural person, and personal information includes ordinary personal information and personal privacy information; ordinary information such as name, telephone number, ID card number, etc.; and personal privacy information emphasizes privacy, which citizens do not want others to know, or is related to social interests. The revised Regulation of the People's Republic of China on the Disclosure of Government Information (2019 Version) (hereinafter referred to as "Regulations"), Article 2 regulates government information. Some scholars believe that government information disclosure is the act and system through which government organs disclose information related to the interests of members of the society in certain forms in accordance with legal procedures, so that citizens can understand or grasp the information owned by the government through various forms of inquiry, viewing, etc.[2] Other scholars also believe that government information disclosure is the disclosure of governmental activities through various forms, the public resources they have, information obtained in the process of exercising administrative rights (except for those involving state secrets and those expressly prohibited by law), so that citizens have the ability to understand and use the relevant information resources.[3] Combined with the Article 13 of the Regulations for the way of information disclosure, this paper believes that government information disclosure is the process of administrative organs in accordance with the provisions of national law, in the process of performing administrative functions produced or acquired, recorded and preserved information, through the active and on-demand way to disclose government information to citizens or legitimate organizations. The personal information in the information disclosure conducted by the government is mostly ordinary personal information such as name, ID number, home address, and private information related to public interest such as land compensation, housing expropriation, and health status.

2.2 The Connection Between Government Information Disclosure and Personal Information Protection

The government collects a large amount of personal information in the course of administrative activities according to the functions of the relevant departments. The disclosure of information by the government in accordance with the relevant regulations may leak the personal information of citizens and violate the legitimate rights and interests of their personal information. On the one hand, the society pays more attention to the protection of personal information, and on the other hand, in order to protect the public interest, part of the information disclosure has to involve the personal privacy of citizens. Therefore, it can be said that there is a natural contradiction between government information disclosure and personal information protection.

The relationship of opposition. According to Article 1 of the Regulations, the purpose of government information disclosure is to "build a government based on the rule of law" and "improve the transparency of government work", the essence of which is to protect the citizens' right to information while strengthening the supervision of government activities and thus promoting the effective operation of government work; while the purpose of personal information protection is to protect citizens' personal rights and privacy. However, in the face of information disclosure by the government, citizens do not want to disclose information involving their own interests on the one hand, and they want to know information involving the interests on the other hand. In terms of attributes, the right to know represents the positive state of access to information in terms of rights and interests of information, while the right to privacy and personality rights represent the negative state of hindering access to information. [4] The right to information protection, which does not want

to disclose its own information, and the right to know, which wants to know others' information, form a natural contradiction.

The relationship of unity. The disclosure of government information and the protection of personal information complement each other. Through the disclosure of government information, citizens can not only effectively monitor government activities, but also ensure that the information collected by the government is handled and used properly, and that personal information is not infringed by others, so as to achieve the purpose of limiting administrative rights. On the one hand, government information disclosure protects citizens' right to know, and citizens can obtain public information according to the law, on the other hand, government agencies can also not disclose personal information involving personal privacy, so as to better protect personal information, and government information disclosure needs to comply with relevant laws and regulations.

2.3 Administrative Regulation Theory: the Construction of Analytical Framework

The theory of regulation originates from economic jurisprudence and involves the balance of interests between government and society[5], with the expansion of the application of law from the field of economic law to criminal law and administrative law. Although there is no unified definition of regulation theory, the existing literature generally agrees that "regulation is the compulsory intervention of government agencies in the market", i.e., the governmental body corrects the state of social and market failure through the regulation of public power. Since administrative jurisprudence is based on "power-rights", its purpose is to further constrain the behavior of the government, while the study of regulation goes deeper into the configuration of rights, Professor Scott analyzes the behavioral basis of rights from the perspective of control systems. In the pragmatic perspective, both administrative jurisprudence and regulation are concerned with solving specific problems with high homogeneity.[6] Therefore, I believe that administrative regulation is the organic combination of administrative jurisprudence and regulation theory, that is, on the basis of restraining the behavior of administrative subjects, through the exercise of administrative power to regulate matters involving public interests and difficult to be handled by the market mechanism itself.

In order to better grasp the theory of administrative regulation, this paper, with references to the connotation and function of the theory of regulation and the administrative law framework of "law of organization - law of conduct - law of remedy", establishes the "Three Points and Four Aspects" of administrative regulation analysis. The three points are subject regulation, process regulation, and regulatory relief, and the four aspects are administrative legislation, administrative procedure implementation, administrative supervision, and administrative relief. The core of regulating the administrative subject is to regulate the source of its power, the government's right to conduct information disclosure is authorized by the state law, and thus considered from the legislative aspect; process regulation that is to regulate the implementation of administrative acts, the government needs to conduct a series of procedures for information disclosure such as: prior notification procedures, information collection procedures, information disclosure procedures, etc., the compliance or non-compliance of the act needs to be realized through supervision, so as to achieve the purpose of restraining administrative subjects The essence of regulation and relief is the correction of misconduct, accountability and realization through the relief system. The "four aspects" connect the "three points" of administrative regulation, making the implementation of administrative regulation become a closed loop, covering the comprehensive regulation from before to afterwards. The implementation subject of government information disclosure is the administrative organ, and the whole process of information disclosure from collection to storage and disclosure is handled and taken care of by the relevant administrative department. The existence of administrative regulation can, to a greater extent, prevent the administrative subject of information disclosure from infringing on the rights and interests of personal information, and at the same time, provide more effective restraint and regulation on the behavior of government information disclosure.

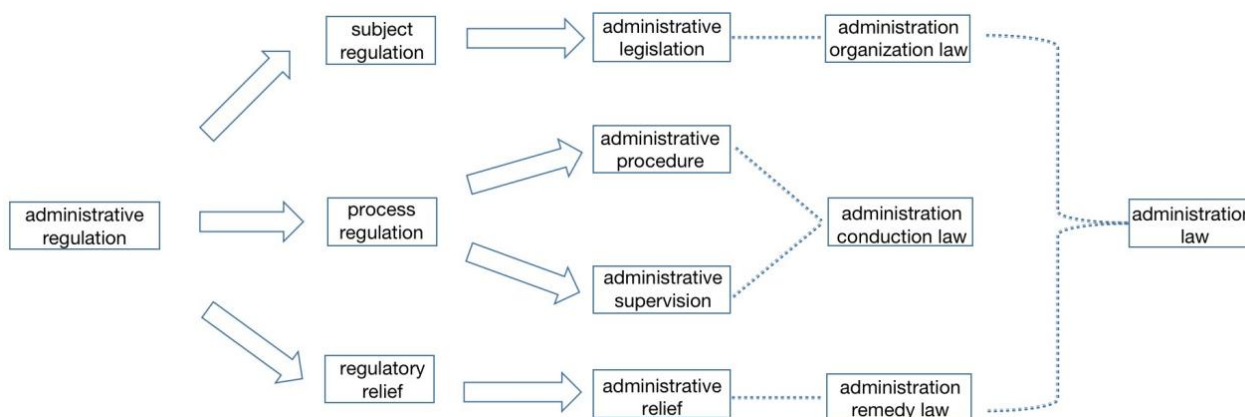


Figure 1. Administrative Regulatory Framework

3. The Status Quo and Shortcomings of Personal Information Protection in China's Government Information Disclosure

3.1 The Protection of Personal Information in the Regulations

The revised Regulations were formally implemented on May 15, 2019. On the level of administrative law, the Regulations are more comprehensive in terms of protection of personal information than before, and the disclosure of government information achieves a closed-loop protection of personal information from legislation, enforcement procedures, supervision, and relief. First of all, the Regulations are the most comprehensive legislation on government information disclosure in China, which is an administrative regulation enacted by the State Council. Article 15 of the Regulations stipulates the requirements for the disclosure of information involving personal privacy, and also stipulates the responsibilities of administrative organs and their staff when the disclosure of information causes infringement of citizens' personal privacy information; secondly, the aforementioned disclosure of personal privacy information Secondly, the disclosure of personal privacy information mentioned above involves the legitimate rights and interests of third parties and public interests, which requires the administrative department to weigh the disclosure or not, and to review the disclosed information in accordance with the State Security Law of the People's Republic of China and other relevant laws and regulations. In terms of the form of active disclosure, with reference to Article 19 of the Regulations, if the disclosure of information involves the personal information of the public, the need for citizen participation in decision-making should be actively disclosed. In terms of the manner of disclosure on application, the administrative organ needs to seek advice from a third party in writing. From the point of view of the disclosure process, the relevant provisions of government information disclosure fully protect the right of citizens to participate and the right to know. Besides, the content of government information disclosure is supervised by the competent department of information disclosure, and the citizens' personal privacy is involved in the government information information, the citizens can also request the administrative organs to rectify the situation according to the relevant regulations. Finally, the administrative organs' information disclosure infringes the citizens' personal information rights and interests, the citizens can remedy afterwards through administrative reconsideration or administrative litigation according to the relevant provisions of Article 51.

3.2 Inadequacy of Personal Information Protection in China's Government Information Disclosure

2.2.1. The Legal Status of the Regulations is Low

Since the Regulations are administrative regulations enacted through the State Council, their legal rank is low and their level is relatively insufficient. As an important right of citizens, the right to

know, the right to personal information, and the right to personality, the balance between the former and the latter requires a higher level of law to protect. Although the General Office of the State Council has issued the "Key Points of Public Affairs Work" since 2012, the relevant provisions are scattered in different laws and regulations, lacking unity and systematization in content, and vague in the definition of relevant concepts, such as the Regulations which explicitly mentions about the protection of citizens' personal information only the citizens' personal privacy information, but does not cover the protection of citizens' general personal information, and according to the Personal Information Protection Law of the People's Republic of China and related laws and regulations, which also do not define general personal information and personal privacy information, so strictly speaking it is impossible to accurately determine which personal information is protected in the government information disclosure "private information". Although it is stated in the Regulations that personal privacy information can be withheld from disclosure, in concrete practice, it is easy for citizens to think that the personal information disclosed belongs to their private information, but the administrative organs judge it as non-private information, making the citizens' personal information rights and personality rights infringed. In addition to this, there is no detailed explanation of the criteria and scope of public interest determination, and the legal norms are mostly principled. In addition, there is no detailed explanation of the criteria and scope of public interest, and the legal regulations are mostly general in principle and lack of more detailed regulations, which may lead to ambiguity in the application and interpretation of the law. [7]The administrative organs have excessive discretionary power, and when faced with the problem of information disclosure, there is no strong legal restraint on the timely or not, and whether to selectively disclose the information of the administrative organs.[8]

2.2.2 Non-compliance with Public Procedures

There are problems of leaking personal information in the process of information disclosure by administrative organs. In the process of government information disclosure, information such as personal phone numbers and addresses of poor households and other groups are publicized and can be freely downloaded and accessed. [9] A "Public Notice of Urban and Rural Special Hardship in a City in October 2021" published on the official website of a municipal government in Hebei Province on October 28, 2021 lists in detail the streets to which urban and rural special hardship cases belong, their names, detailed ID numbers, monthly support amounts and other information, and the information set reached as many as 2001 people. Government information disclosure leaks information related to citizens' physical health, social assistance, etc. In August 2017, the "List of people in a certain community for 2017 preconception eugenics health examination" in the information disclosure network of a municipal government in Anhui Province disclosed in detail 40 couples' names, examination dates and other information, and most of the grassroots communities under the jurisdiction of the city published information such as social assistance. Excessive information disclosure not only does not help the smooth implementation of the work, but also leaks the personal information of the citizens concerned, and once their personal information is improperly used by unscrupulous organizations or individuals, their personal information rights and personality rights are easy to suffer illegal infringement.

As a matter of fact, government information disclosure has caused several personal information protection litigation cases. This indicates that information disclosure of the relevant administrative procedures are not standardized and perfect. The current cases of government information disclosure and personal information protection are mainly of four types: the first type is the government information disclosure caused by the perpetrators of anti-information disclosure, as exemplified by "Li Mou v. Changsha City, Hunan Province, a district government information disclosure case"; the second is the administrative organ to disclose information without written consultation to a third party, and the person himself judged that the relevant information; the third type is that the administrative organ did not consult the third party in writing when disclosing the information, and the third party did not agree to disclose the information; the fourth is the trade-off between personal privacy information and public interest, as exemplified by the case of "Fangmou v. a district education bureau

of a city". The above four cases show that China's administrative procedures of prior notice, collection and use of personal information and related inquiries, and review of exceptional matters are not perfect in practice. [10] As mentioned in the previous article, "administrative organs have a large discretionary power", which is not conducive to regulating the behavior of information disclosure organs.

2.2.3 Lack of Supervision of Government Information Disclosure

First, the supervision of the administrative subject is insufficient. According to the Article 60 of the Personal Information Protection Law of the People's Republic of China and the Article 47 of the Regulations, "the relevant departments within their respective areas of responsibility to perform the duties and supervision of the protection of personal information", and government information disclosure is supervised by the competent department of public work. Therefore, the work of the administrative organ information disclosure can be said to be its own to carry out supervision, combined with the judicial practice of government information disclosure case. In the judicial practice of government information disclosure cases, most cases of information disclosure infringing on the rights and interests of personal information are found through external supervision by citizens, media, etc. Although the legislator fully considers the supervision of the department responsible for information disclosure, the supervisor is the administrative organ itself cannot give full play to the role of internal supervision, which is easy to cause administrative organs to "do their own business". In view of the circulation and borderless nature of information, for the protection of personal information in government information disclosure, administrative organs responsible for the protection of personal information should cooperate and supervise together, and it can be seen that the current regulatory system of government information disclosure is still not perfect.

Second, the supervision of government information disclosure behavior is insufficient. Information collection, storage and transportation, and disclosure are the three links of government information disclosure [11]. Lack of supervision will easily lead to the leakage of personal information in the three links of information disclosure stage. Information collection is an activity carried out by government agencies and their authorized institutions or organizations out of their own duties and legal provisions, and it is necessary for the relevant agencies to explain the purpose and use in the collection process. The key points for information collection supervision are: can the information collection process and the procedures of the staff of administrative agencies be legal? Is the process of entering the information data compliant? Taking the case of administrative cancellation dispute between Du and the traffic police detachment of a city public security bureau as an example, the infringement of citizens' legitimate rights and interests happened due to the staff of the public security organs who entered the information wrongly. The legislation supervising the storage and transmission of personal information is not clearly stipulated in the Regulations, and Article 26 of the Law of the People's Republic of China on Guarding State Secrets mentions that the transmission of state secrets is prohibited without confidentiality measures. Although personal information as well as personal privacy does not reach the level of state secrets, personal privacy, once leaked, can seriously infringe on the personal rights and interests of citizens, even to the extent of endangering social stability. [12] In the early stage during the COVID-19 pandemic, personal information of suspected or confirmed cases should have been disclosed by the government after encrypted transmission and anonymous processing, but the deputy director of a district health and wellness bureau forwarded the investigation report of the cases to other people, leading to a large spread in WeChat groups, which not only infringed on citizens' privacy but also caused serious social impacts. The information disclosure stage lacks regulatory work in terms of personal information security. According to the Annual Assessment Indicators for the Supervision of Government Websites and New Government Media issued by the Secretary Bureau of the General Office of the State Council in 2019, there is no mention of "personal information protection" in the index system for assessing government information disclosure. Since the disclosure of citizens' personal information must be approved by the right holder before it can be disclosed, however, the administrative organ has a large discretionary power and is prone to the situation that "the private information considered by the citizens is not the

private information identified by the administrative organ", and the administrative organ thus skips the procedure of seeking the consent of the right holder, if the information disclosure. If the supervision of the information disclosure stage can be further improved, the problem of personal information rights caused by government information disclosure will be alleviated. The lack of supervision of administrative subjects in the information disclosure stage directly affects the effectiveness and coordination of government information disclosure.

2.2.4 Inadequate Relief System in Government Information Disclosure

Although the Regulations provide that citizens can seek remedy through administrative litigation when information disclosure by administrative organs infringes on their legitimate rights and interests, the actual relief process is often difficult to achieve reasonable expectations due to the lack of standard guidance. The current administrative remedy is in favor of "liability remedy", i.e., to "supervise and rectify or inform and criticize" the authorities whose information disclosure infringes on the rights and interests of citizens' personal information, and to "punish the responsible leaders and those directly responsible". In other words, the authorities responsible for the infringement of the rights and interests of citizens' personal information should "urge rectification or inform and criticize", and the leaders and those directly responsible should be "punished according to the law, and in serious cases, criminal responsibility should be pursued". Since the disclosure of government information has caused the leakage of citizens' personal information and the illegal use of citizens' personal information and even private information, the administrative organs can certainly realize the psychological relief for the victims through public apologies and other forms, but in the face of the loss of property due to the leakage of privacy, the administrative organs cannot provide effective economic relief. Due to the lack of economic relief in the Regulations and the Personal Information Protection Law of the People's Republic of China, and the difficulty of hearing cases due to the return of funds involved in judicial practice, it is difficult to identify other indirect losses in addition to the direct losses of the infringed person, and citizens can certainly seek compensation from the state organs or organizations authorized by law through the State Compensation Law of the People's Republic of China, but in fact, the infringed person can seek compensation from the public authorities because of the disclosure of government information. In fact, there are few results in seeking compensation from public authorities for the disclosure of government information.

4. The Path to Improve the Protection of Personal Information in China's Government Information Disclosure

4.1 Promote the Top-level Design of Legislation, Improve the Legal System

It is recommended that the Government Information Disclosure Law of the People's Republic of China be enacted to raise the rank of government information disclosure regulations. As mentioned above, the legal effect of the right to information protected by the Regulations is lower than the right to personal information protected by the Personal Information Protection Act of the People's Republic of China. In terms of legislation, the government can learn from the United States, Japan and other countries that have a more complete government information disclosure system. Therefore, it is necessary to define the scope of "public interest" in the legislation and clarify what belongs to public interest, so as to prevent administrative organs from abusing personal information of citizens under the pretext of "public interest". Secondly, to refine the content of government information disclosure, the current regulations on government information disclosure in China are mostly general provisions, which can be issued as a judicial interpretation of "personal privacy" and other related issues in information disclosure. Finally, the consultation system should be set up in the process of information disclosure, and if the administrative organ does not obtain the consent of the third party, the administrative organ and the right holder can negotiate. Although the principle of proportionality should be followed in information disclosure, it is not known whether the principle of proportionality favors the public authority or not.

4.2 Complete Information Disclosure Procedures, Standardize Information Disclosure Behavior

First of all, administrative organs need to improve the prior notice procedure. Before the administrative organ discloses information, if it determines that the content of the disclosure is reasonable and lawful, regardless of whether it damages the rights and interests of third parties, it should notify the person concerned if the information involves personal privacy. Second, improve the inquiry procedures of administrative organs. Although according to the regulations personal information shall not be disclosed at will, the information owner shall have the right to inquire about his own personal information. Once the personal information is found to be wrong, it should be able to apply for changes in accordance with the law to prevent damage to the rights and interests of the right holder; finally, improve the information disclosure procedures and improve the working system of information disclosure application and review. Application for information disclosure needs to fill in the applicant's personal information, the use and purpose of the information, the relevant departments to do a good job of substantive review, review, processing and other processes are involved in the handover of citizens' personal information, not long ago, netizens complained about a star's cheating in the secondary school examinations, to the relevant authorities to respond to the problem, personal privacy was leaked, the departments involved still have not responded. The principle of procedural due process safeguards the rights and interests of citizens' personal information. The improvement of information disclosure procedures promotes the construction of personal information protection.

4.3 Establish a Dedicated Regulatory Authority

First, the establishment of a special information supervisory department to limit the discretion of the information disclosure department and to supervise the behavior of the relevant departments and their staff in the information disclosure process. The Regulations stipulate that information disclosure shall be supervised and guided by the competent department, but in essence, it is still in the "self-supervision", and the administrative organs set up an internal special information supervision committee to supervise as a third party and follow the principle of fairness and impartiality. The supervisory committee not only supervises the content of information disclosure, but also supervises whether the competent department performs its duties, and whether the information is properly collected, stored and transported, and disclosed in three stages. Second, regular technical inspections and vulnerability scans should be conducted during the information disclosure process to detect security risks in a timely manner, and specific revision plans should be formulated for the published content so that problems can be switched and handled in a timely manner once they are detected during inspections. Further develop unified and operable standards for information disclosure, as well as the disclosure of personal privacy for desensitization paradigm, information disclosure involving personal information rights holders can judge by analogy whether the administrative organs information disclosure compliance. Finally, the opening of external monitoring channels, according to the views of citizens, the media, social groups, etc. to check the implementation of the citizens are the subject of personal information infringement, in the face of infringement can be timely feedback to the administrative organs in order to trace the root cause.

4.4 Improve the Government Information Disclosure Relief System

Although the Regulations mention that the applicant has the right to appeal in the information disclosure link, the provisions of substantive line relief are missing. The following aspects need to be improved: First, the legal responsibility of state compensation should be clarified. If the disclosure of information by government agencies makes citizens' personal privacy infringed, not only should the responsible leaders and directly responsible personnel be punished, but government agencies should also deal with the dissemination of personal information data, and have the obligation to curb or eliminate the continuous dissemination of information, and make appropriate financial compensation according to the degree of victimization of the rights and interests of the parties concerned.

Negotiation processing. Second, the establishment of a lawsuit stop enforcement mechanism to provide relief and protection by stopping the enforcement and preempting the act of information disclosure. Within the time limit of government information disclosure, the public content should be stopped immediately when the right holder applies for relief, regardless of whether it is infringed and to what extent it is infringed. Pre-issuance of an order prohibiting the disclosure of information prior to the judgment [13], safeguarding citizens' right to participate, personal privacy.

5. Conclusion

The implementation of the revised Regulations will play an important role in improving the protection of personal information in the process of government information disclosure in China in the era of big data. It not only clarifies and refines the boundaries of government information disclosure, complements the form and content of active disclosure, establishes the protection of personal privacy and other information in the law, but also the relevant provisions further regulate the behavior of government agencies in information disclosure. From the perspective of administrative law, administrative regulation analyzes the rule of law problems faced by the government in information disclosure, improves the protection of citizens' personal information from four perspectives: legislation, procedure, supervision, and remedy, and regulates the three main points of subjects, process, and remedy in the process of government information disclosure, so as to limit public power through public law and let the right be exercised within appropriate limits. For sure, the rule of law construction of government information disclosure and personal information protection does not stop here, as a country focusing on administrative regulation, we need to continue to base on the national conditions, to introduce the corresponding judicial interpretation and regulations for the existing problems, and continue to improve the legal system of government information disclosure, to protect the security of citizens' personal information.

References

- [1] Ye, Z.B. Yang, H. The Evolution of the Information Disclosure System of the Chinese Government from the Perspective of Historical Institutionalism[J]. *Journal of ChangZhou University(Social Science Edition)*, 2020, 21(04):12-22.
- [2] Chu, S.Y. Analysis and Reflection on the Current Situation of Government Information Disclosure in China[J]. *Expanding Horizons*, 2003, (03):31-33.
- [3] Wu, G.P. WTO and China's Governmental Information Openness [J]. *Socialism Studies*, 2002(06):77-79.
- [4] Zhao, R.Y. Hu, D.D. Research on the Personal Information Protection Strategy under the Background of Government Information Disclosure[J]. *Information Studies:Theory & Application*, 2015, 38(08):16-20.
- [5] Zhao, X. Towards "Open Regulation": Reflection and Reconstruction of Regulation Standards Review and Discussion on Regulation: Legal Form and Economic Theory [J]. *Tribune of Political Science and Law*, 2021, 39(03):176-183.
- [6] Chen, M. Taking Regulation Seriously - A Review of Regulation, Governance and Law: Addressing Current Challenges [J]. *Public Law Research*, 2021, 21(03):396-417.
- [7] Zhang, B. AOn the Government Information Publicity in Emergencies [J]. *Journal of Shanxi Provincial Committee Party School of C.P.C*, 2022, 45(01):72-77.
- [8] Liu, K.J. Research on the Protection of Personal Privacy in the Government Information Disclosure[J]. *Electronics Intellectual Property*, 2018(11):95-103.
- [9] Yu, J. Ji, M.Z. Study on Personal Information Protection in Chinese E-government [J]. *Journal of Beijing Electronic Science & Technology Institute*, 2020, 28(02):37-44.
- [10] Dong, Y. To Protect Personal Information in Government Information Publicity [J]. *Journal of Shanghai University of Political Science & Law(The Rule of Law Forum)*, 2018, 33(03):20-28.
- [11] Zhang, X.Y. Research on the Protection of Personal Information under Government Information Disclosure [D]. *Guangdong University of Foreign Studies*, 2013.

- [12] Zhang, G.X. Research on the Balance between Government Information Disclosure and Personal Information Protection in Epidemic Prevention and Control[J]. Journal of Hubei University of Police, 2020, 33(02): 25-33.
- [13] Mirguri Amiruddin. On the Protection of Individual Privacy in Government Information Disclosure [D]. Xinjiang University, 2014.