Danish scientific journal
DSJ

Danish Scientific Journal

№92 2025

Danish scientific journal
DSJ

№92/2024
ISSN 3375-2389
Vol.1

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Istedgade 104 1650 København V Denmark
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RIGHT TO DIGITAL SERVICES AS A NEW HUMAN RIGHT

Guluzade M.
PhD
Head of Board of the Law and Human Rights Institute of Azerbaijan
Mahmudov S.
LLM
Executive Director at the Center for Legal Examination and Legislative Initiatives of Azerbaijan
https://doi.org/10.5281/zenodo.14770647

Abstract
Enjoyment of human rights should not have territorial boundaries as such. Therefore, the present article suggests 'the right to digital services' as a new human right and analysis its scope from the perspective of the extra-territoriality principle. At the same time, the article attempts to analyze and discuss advantages and legal grounds of a 'techno-legal station' (TLS), a futuristic digital extra-territorial station that could enable any person to access digital services of a number of countries, including the country of his/her nationality irrespective of his/her physical location. In light of these issues, the article also reviews modern trends in ensuring human rights and data protection in modern technological and AI platforms, including a new EU Digital Wallet.

Keywords: human rights, extraterritorial guarantees, AI, digital services, digital wallet, DSA Digital Identity Regulation.

1. INTRODUCTION

Presently, a person living abroad enjoys human rights of his country of residency (right to work, freedom of movement, right to marry, right to education, etc), as well as parallelly of his country of nationality (right to vote, right to diplomatic protection, right to return, etc). Nevertheless, the scope of his/her rights in relation to his country of nationality in practice is restricted by the mere fact of person's presence in another state. Such a limitation is not justified in light of globalization, pandemics, as well as the opportunities that modern technologies, including artificial intelligence (AI) can offer.

Rapid development of e-government, m-government (mobile government), online digital services to citizens[1] and similar novelties open new perspectives to traditional legal principles, including the territorial jurisdiction principle for ensuring human rights. Use of technologies not only helps to save on costs, but also makes it more efficient for the end-users. Hence, the third generation of human rights shall be extended to include a new 'right to digital services'.

2. MODERN TRENDS WITHIN UNITED NATIONS, EUROPEAN UNION AND COUNCIL OF EUROPE

In 2020 Secretary-General of the United Nations, Antonio Guterres, appealed to Member States and other stakeholders to 'launch a decade of work and action for the benefit of people and the planet',[2] using, among other things, the e-government model. By investigating and exploring common models of this mechanism around the world, the United Nations E-Government Survey assessed the development of digital government in 193 UN Member States, identifying their strengths, challenges, and opportunities, and providing information on policies and strategies. With the view that the protection of human rights is one of the key obligations of a state and international community by virtue of universality of the human rights, the United Nations called to ensure international cooperation and coordination in this sphere.

Stemming from its reform process, the UN recognized that 'science and technology, including information and communication technology, are vital for the achievement of the development goals' and committed itself to

Building a people-centered and inclusive information society so as to enhance digital opportunities for all people in order to help bridge the digital divide, putting the potential of information and communication technologies at the service of development and addressing new challenges of the information society. [3]

Attempts to provide e-services beyond national boundaries were recently taken also at EU level[4], but

[1] For example, the Republic of Azerbaijan through e-government portal offers its citizens 357 e-services of 27 state agencies. See at https://e-gov.az/az/services [last accessed on 5 August 2024].

[2] Legal Regulation of State Electronic Services: Relevant Issues and Ways of Improvement | Data Science Journal (codata.org), 2020 [last accessed on 29 July 2024].

[3] See para 60 at https://www.un.org/en/development/desa/population/migration/generalassembly/docs/globalcompact/A_RES_60_1.pdf [last accessed on 29 July 2024].

[4] For example, the following:

- The Communication 2030 Digital Compass: The European Way for the Digital Decade, based on which by 2030, all key public services should be available online, all citizens will have access to electronic medical records; and 80% citizens should use an electronic identification solution. [last accessed on 29 July 2024]
- The Electronic Identification, Authentication and Trust Services (eIDAS) Regulation, which provides the basis for cross-border electronic identification, authentication and website certification within the EU. [last accessed on 29 July 2024]

'the lack of a common legal basis has prevented Member States from recognizing and accepting electronic identification schemes issued in other Member States. The insufficient cross-border interoperability of national schemes prevents citizens and businesses from benefitting fully from a digital EU'.[5]

Following this, EU adopted the Digital Identity Regulation (entered into force in May 2024), which will be utilized by EU nationals as well as residents (non-nationals). European Digital Identity Wallets should allow users to electronically identify and authenticate online and offline across borders for accessing a wide range of public and private services.[6]

In parallel, in 2022 EU adopted a Regulation on the Digital Services Act (DSA) and since 17 February 2024 the Digital Services Act rules apply to all platforms in EU. The DSA regulates online intermediaries and platforms such as marketplaces, social networks, content-sharing platforms, app stores, etc. Its main goal is to prevent illegal and harmful activities online and the spread of disinformation. It ensures user safety, protects fundamental rights, and creates a fair and open online platform environment.[7] The Commission will enforce the DSA together with national authorities, who will supervise the compliance of the platforms established in their territory.

With plans to adopt the Framework Convention on Artificial Intelligence and Human Rights, Democracy and the Rule of Law on 5 September 2024 (hereinafter 'CoE Convention on AI'), the Council of Europe also attempted 'to catch up' with modern trends related to AI and human rights. Indeed, in its preamble, the Council of Europe acknowledge that '[…] developments in science and technology… have the potential to promote human prosperity as well as individual and societal well-being…'.[8]

3. EXTRATERRITORIAL GUARANTEES

The 'Maastricht Principles on Extraterritorial Obligations in the area of Economic, Social and Cultural Rights' (Maastricht Principles) issued on 28 September 2011 clarify extraterritorial obligations of States on the basis of standing international law.[9]

All States have obligations to respect, protect and fulfil human rights, including civil, cultural, economic, political and social rights, both within their territories and **extraterritorially.**[10] According to Principle 8 (b) of Maastricht Principles, extraterritorial obligations encompass obligations of a global character that are set out in the Charter of the United Nations and human rights instruments […] to realize human rights universally.[11]

States must take deliberate, concrete and targeted steps, separately, and jointly through international cooperation, to create an international enabling environment conducive to the universal fulfilment of economic, social and cultural rights, including in matters relating to bilateral and multilateral trade, investment, taxation, finance, environmental protection, and development cooperation. The compliance with this obligation is to be achieved through, inter alia measures and policies by each State in respect of its foreign relations, […] and policies that can contribute to the fulfilment of economic, social and cultural rights extraterritorially.[12]

Moreover, in fulfilling economic, social and cultural rights extraterritorially, States must prioritize the realization of the rights of disadvantaged, marginalized and vulnerable groups; and move as expeditiously and effectively as possible towards the full realization of economic, social and cultural rights.[13]

According to the USA's Restatement (Third) of Foreign Relations Law, there are five recognized bases of extraterritorial jurisdiction in international law as follows:

(1) Nationality: A nation may regulate the conduct of its citizens and assert jurisdiction over its citizens wherever they are located;

(2) Effects: A nation may regulate activities which have a substantial territorial effect;

(3) Protective: A nation may regulate extraterritorial conduct where there is a connection between the act and national security;

(4) Universality: Any state may assert jurisdiction over activities which are universally considered crimes against humanity;

(5) Passive Personality: A state may assert jurisdiction where the victim of the act is a national of the state asserting jurisdiction.[14]

It further provides that jurisdiction under any of the five bases is subject to a balancing test to determine the reasonableness of asserting jurisdiction to prescribe over a matter. The balancing test, includes inter alia 'extent to which regulation is consistent with international norms' and 'the likelihood of conflict with another nation'.[15]

In order to ensure these two grounds, there might be a need for an international treaty that would provide the legal recognition of the 'right to digital services' and extraterritoriality.

- The Commission maintains and provides identity related digital services (eDelivery, eSignature, eID). See at https://digital-strategy.ec.europa.eu/en/policies/electronic-identification [last accessed on 29 July 2024]

[5] See at https://digital-strategy.ec.europa.eu/en/policies/electronic-identification [last accessed on 29 July 2024]

[6] See at https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52021PC0281 [last accessed on 29 July 2024]

[7] See at https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/europe-fit-digital-age/digital-services-act_en [last accessed on 05 August 2024].

[8] See Preamble, the Council of Europe Framework Convention on Artificial Intelligence and Human Rights, Democracy and the Rule of Law, to be signed on 5 September 2024. CoE Treaty Series – No.[225].

[9] Maastricht Principles on Extraterritorial Obligations of States in the area of Economic, Social and Cultural Rights, 2013. [available at https://www.etoconsortium.org/en/the-maastricht-principles/ last accessed on 08 August 2024].

[10] Ibid, Principle 3.

[11] Ibid, Principle 8 (b).

[12] Ibid, Principle 29.

[13] Ibid, Principle 32.

[14] Wade E., 1997, 'The Five Bases of Extraterritorial Jurisdiction and the Failure of the Presumption against Extraterritoriality', *Hasting International and Comparative Law Review*, p.181.

[15] Ibid.

4. EXTENDING THE SCOPE OF 'PROHIBITION OF DISCRIMINATION' TO INCLUDE 'PLACE OF LIVING'

One of the main guarantees in realization of the rights is prohibition of discrimination on various grounds, including race, gender, religion, disability, social origin, etc. Nevertheless, we believe another ground for prohibiting discrimination should be included in those lists and this ground is 'place of living'. In other words, enjoyment of human rights should not have territorial boundaries as such. This is in line with the Principle 36 of 'Limburg Principles on the Implementation of the International Covenant on Economic, Social and Cultural Rights' ('Limburg Principles') that 'the grounds of discrimination mentioned in article 2(2)[16] are not exhaustive'.[17]

If 'place of living' is included into grounds upon which discrimination is prohibited, then according to Principle 22 of 'Limburg Principles', it would require 'immediate implementation in full by all States parties'.[18]

Prohibition of discrimination is one of the rights guaranteed under the European Convention on Human Rights (ECHR, article 14). According to the Guide on article 14 of the ECHR, 'when bringing a complaint under Article 14, the applicant has to show that he or she has been treated differently from another person or group of persons placed in a relevantly similar situation, or equally to a group of persons placed in a relevantly different situation'.[19] Based on this approach, the European Court of Human Rights (ECtHR) found that the pensioners living within a country were not in a comparable situation to those living abroad as regards index-linking of pensions (*Carson and Others v the United Kingdom* [GC], 2010).[20]

Similarly, in *Pichkur v Ukraine* (2013) (where the applicant complained that his pension payments were terminated on the ground that he had been permanently resident abroad), the Strasbourg Court stated that

the rise of population mobility, higher levels of international cooperation and integration, as well as developments in the area of banking services and information technologies no longer justify largely **technically motivated restrictions** in respect of beneficiaries of social security payments living abroad (§ 53).[21]

As we see, in this judgement the ECtHR refers to person's living abroad as '*technically motivated restrictions*' which cannot be a ground for a discrimination and for reducing the volume of rights s/he is eligible to where such rights can be guaranteed by 'information technologies' as suggested in this article.

5. INTERNATIONAL COMMITMENT OF STATES TO ESTABLISH CONDITIONS

UN Charter in its Preamble urges the states: (i) to establish conditions under which justice and respect for the obligations arising from treaties and other sources of international law can be maintained, and (ii) to promote social progress and better standards of life in larger freedom.[22]

We suggest reading 'establishing conditions' and promoting 'social progress and better standards of life' through prism of new digital services and the intention to offer extraterritoriality in enjoyment of human rights.

The Principle 8 of 'Limburg Principles' states: 'Although the full realization of the rights recognized in the Covenant is to be attained progressively, the application of some rights can be made justiciable immediately while other rights can become justiciable over time'.[23]

As we can see, the drafters of the International Covenant on Economic, Social and Cultural Rights (ICESCR) envisaged that some of the rights might be better guaranteed in future when the conditions so enable. We believe with modern level of incorporation of technologies and AI in our life this 'time' has come.

According to para 1 of Article 2 of ICESCR:

1. Each State Party to the present Covenant undertakes to take steps, individually and through international assistance and co-operation, especially economic and **technical**, **to the maximum of its available resources**, with a view to achieving progressively the full realization of the rights recognized in the present Covenant by all appropriate means, including particularly the adoption of legislative measures.[24]

This is yet another evidence that the states have the obligation under ICESCR to undertake especially, inter alia, technical steps 'to the maximum of its available resources' to ensure full realization of the rights enshrined in the Covenant. According to Principle 26 of the Limburg Principles, 'Its available resources' refers to both the resources within a State and '**those available from the international community** through international co-operation and assistance'. At the same time, the words 'all appropriate means' (above) shall be understood to cover also setting a possibility to mail submission of final documents which are digitally requested by a person from abroad.

As part of the efforts to improve human rights practices, the Vienna Declaration and Programme of Action used the term 'equal rights'[25] which to our view should also cover people outside of the country's territory. At the same time, it refers to 'development' (for example, Article 10) which in current times should also

[16] The International Covenant on Economic, Social and Cultural Rights, 1966.

[17] See https://www.escr-net.org/resources/limburg-principles-implementation-international-covenant-economic-social-and-cultural [last accessed on 29 July 2024].

[18] Ibid.

[19] Para 52, at https://www.echr.coe.int/documents/d/echr/Guide_Art_14_Art_1_Protocol_12_ENG [last accessed on 29 July 2024].

[20] Application no. 42184/05

[21] Application no. 10441/06.

[22] United Nations. *Charter of the United Nations*, UN Doc. E/C.12/2005/4 (11 August 2005).

[23] United Nations. *Limburg Principles on the Implementation of the International Covenant on Economic, Social and Cultural Rights*, UN Doc. E/CN.4/1987/17 (8 January 1987).

[24] United Nations General Assembly. *International Covenant on Economic, Social and Cultural Rights*, UN Doc. A/RES/2200A(XXI) (16 December 1966).

[25] The World Conference on Human Rights, 1993, available at https://www.ohchr.org/en/instruments-mechanisms/instruments/vienna-declaration-and-programme-action [last accessed on 29 July 2024].

extend to technologies, artificial intelligence (AI) and digital services. According to Article 10 of the UN Declaration on the Right to Development (1986), 'Steps should be taken to ensure the full exercise and progressive enhancement of the right to development, including the formulation, adoption and implementation of policy, legislative and other measures at the national and international levels'. [26]

The unprecedented combination of resources and technology at our disposal today means that we are truly the first generation with the tools, the knowledge and the resources to meet the commitment, given by all States in the Millennium Declaration, 'to making the right to development a reality for everyone and to freeing the entire human race from want'.[27] Not surprisingly the states also supported the Target 9.1 of the Sustainable Development Goals, which aims to 'Develop quality, reliable, sustainable and resilient infrastructure, including regional and transborder infrastructure, to support economic development and human well-being, with a focus on affordable and equitable access for all'.[28]

Government's investment in digitalization of its services can eventually return in huge savings in the future. For example, Estonia's national electronic identification document (eID) and X-Road data exchange layer saves an estimated two percent of Gross Domestic Product per year by reducing paper-based.[29] Similarly India enjoys 1 billion USD per annum savings from having a digital identity platform ('Aadhaar'), which uses biometric data to reduce fraud and leakage.[30]

6. OPERATING MODALITY OF TECHNO-LEGAL STATION

One suggestion on how governments can ensure digital services to its citizens globally, is by setting-up techno-legal stations (TLS) in third countries. Despite extraterritorially often was developed for the purposes of setting liability for foreign conduct by foreign actors,[31] in case of techno-legal station it is vice-versa, as it is set-up for the purposes of providing more rights to nationals and non-nationals. For example, Germany (with 1.3 million Turkish citizens[32]) and Türkiye can reciprocally agree to set-up TLS(s) within their territory (or online as described below) so that their citizens could enjoy access to digital services while on travel.

TLS can operate in two modalities:

a) Technological 'booth' to be located in various cities of the world;

b) Online platform.

For both modalities they need capacity of:

- 'identifying' a person by technological tools (fingerprints, eye scanning, face recognition, ID scanning, etc);
- digitally assisting the service user (voice commands, multi-language 'smart assistant', screening the available services, etc.);
- receiving payments by cash, cards and/or cryptocurrency;
- confirming correctness of the user's submission on behalf of a state body concerned;
- reporting on attempts to falsification;
- video recording and storing each service provided.

Each modality has its own advantages and disadvantages. For example, the 'technological booth' modality would be able to accept payment by cash, identify user by eye scanning and fingerprints, scan his/her ID, navigate persons who are not good at using technologies, etc. In contrast, online platform would be more accessible and cost-efficient. Ideally with developing cell phone technologies in the future, both modalities can operate in parallel.

One of the concerns regarding operation of TLS is a data protection which is analyzed below.

7. PERSONAL DATA PROTECTION RELATED ISSUES

Any digital or online activity has potential human rights risks, including gender equality, child rights, data protection, etc. despite digital platforms use various approaches in relation to data storage and data protection (blockchain, decentralized digital identity system, self-sovereign identity, Privacy-Enhancing Technologies or «PETs», etc). Such risks do not safeguard government-managed digital identity platforms as they are also affected by many of the same ethical and security problems as corporate digital identity platforms.[33]

At present EU's set of regulations and standards on data protection (i.e. General Data Protection Regulation (GDPR), 'Wallet', DSA, etc) somehow safeguard citizens from violation of data protection as they act in parallel to operation and regulation of online platforms/services.

For example, the principle of data protection by design, embedded in Article 25 GDPR, requires the data controller to implement data protection principles through the adoption of «appropriate technical and organizational measures», both «at the time of the determination of the means for processing and at the time of the processing itself». A key point of this principle is that the «appropriateness» of the technical and organizational measures has to be assessed by the data controller following a risk-based approach, meaning that

[26] See the Declaration on the Right to Development at 25, [last accessed on 29 July 2024].

[27] United Nations General Assembly. *United Nations Millennium Declaration*, UN Doc. A/RES/55/2, para. 11 (18 September 2000).

[28] At https://sdgs.un.org/goals/goal9#targets_and_indicators [last accessed on 29 July 2024].

[29] Sedlmeir J. et al, 2021, Digital Identities and Verifiable Credentials, Bus Inf Syst Eng 63(5), p.605.

[30] World Bank data, available at https://economictimes.indiatimes.com/news/economy/finance/aadhaar-id-saving-indian-govt-about-1-billion-per-annum-world-bank/articleshow/50575112.cms?from=mdr [last accessed on 5 August 2024].

[31] Dodge W., 2023, '1990 Anti-Terrorism Act and 1996 Helms-Burton Act, more discussion at Personal Jurisdiction and Extraterritoriality', Blog November 2023, available at: tlblog.org (last accessed 29 July 2024).

[32] See at https://www.statista.com/chart/29975/number-of-turkish-people-in-european-countries/ [last accessed on 08 August 2024]

[33] Khera R (ed), 2018, Dissent on Aadhaar: Big data meets big brother. Orient BlackSwan, Hyderabad.

the higher the risk for the rights and freedoms of data subjects created by the personal data processing activity, the stronger and more robust the technical and organizational measures will need to be.[34]

The Council of Europe also expressed its concern 'by the misuse of the artificial intelligence systems' in the 'CoE Convention on AI'.[35] With this in mind, the CoE Convention on AI aims 'to ensure that activities within the lifecycle of artificial intelligence systems are fully consistent with human rights, democracy and the rule of law' and requires Each Party to 'adopt or maintain appropriate legislative, administrative or other measures to give effect to the provisions' of the said Convention.[36] Particular attention is paid to ensuring privacy rights and personal data[37] and such measures as monitoring of risks, documentation of risks and testing are expected to be taken by the state parties.[38]

For the purposes of the EU's «Wallet», individuals will have to provide information on the following: (i) first name; (ii) last name, (iii) date of birth and (iv) a unique identifier.[39] In any case, every individual wishing to enjoy remotely the right to digital services, will have to make a decision whether to risk his/her privacy or not. There would never be 100% guarantees of the data protection.

8. CONCLUSION

Enjoyment of human rights should not have territorial boundaries as such. Any person should freely access digital services related to his/her country of nationality (and any other country) and the physical presence of a person (or 'technically motivated restriction' as references by the ECtHR) in the country shall not be required in leu of possibility of 'digital recognition' by modern technology (for example, as in the suggested 'techno legal station').

'The right to digital services' as a new human right suggested in the present article has sufficient grounds in international law and practice. The risks such as possible identity falsification, fraudulent measures to obtain someone's documents, etc would be inevitable but commensurate to the benefits for the millions of other users.

At the same time the following measures shall be taken on the legislative level to enable enjoyment of such right:

- A new human right (the right to digital services) shall be introduced to the legislation;
- 'Place of living' shall be included into grounds for which discrimination is prohibited;
- Possibility of person's verification by technological tools and AI shall be introduced to the legislation;
- The legislation shall provide for mail submission of final documents which are digitally requested by a person from abroad;
- States shall cooperate for international recognition of extra-territorial use of 'techno-legal stations'.

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[35] Supra note 8.

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