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The Right to Privacy of Children in the Digital World and the Responsibility of Adults with Special Focus on Social Networks as Modern Media Communication

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Abstract:

The authors deal with the issue of the right to privacy of children on the Internet from the aspect of international and domestic regulations in the field of personal data protection. In this regard, the authors try to address certain issues related to the form of violating the right to privacy of children on the Internet by publishing their personal data on social networks and electronic media, as well as the question of the responsibility of adults above all for such acts. The aim of this paper is to advocating the problem of violating the right to privacy of children on the Internet by parents, teachers, trainers, peers or media workers, as well as the relationship between such acts and children's dignity and security.

Key words: *right to privacy, protection of children, social networks, security, responsibility.*

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1. Introduction

The right to privacy is one of the basic human rights that every human being has regardless of race, sex, age, skin color. They are not owed to the state or to its will, they have a moral and not a positive legal character. They come from a normative order that is above the state and the state has to respect them irrespective of whether they have explicitly agreed or not. One of the first definitions of privacy as right originates from the year 1890 by young Boston lawyers Samuel Warren and Louis Brandeis which define privacy as “right to be let alone” (Warren & Brandeis, 1890:193). Warren and Brandeis argued that it was necessary for the legal system to recognize the right to privacy because, when information about an individual’s private life is made available to others, it tends to influence and even to injure the very core of an individual’s personality “his estimate of himself” (Warren & Brandeis, 1890:197). According to this view, the right to privacy implied the protection of personal autonomy, moral and physical integrity, the right to choose a lifestyle and lifestyle, interactions with other people, and so on. To inventors of the right to privacy, it’s meant that each individual had the right to choose to share or not to share with others information about his or her private life, habits, acts, and relations (Glancy, 1979:2). This simple definition reflects the recognition of privacy at the end of the 19th century, when print media and new technological innovations like photography were responsible for the growing invasion on private and domestic areas. The authors express that the circulation of personal information is perceived as privacy to violation and suggest prioritizing human’s basic right over the interest of the society to spread information (Kolter, 2010:21). Over time, this understanding is supplemented by mechanisms for practicing these rights. Thus, the citizen is enabled to have certain expectations from the entities that process his data in relation to the way this data is used (Ivanović, 2017:155).

The right to privacy is regulated both by international and national regulations. All international instruments for the protection of human rights guarantee the right to privacy.

Universal Declaration of Human Rights (UDHR)¹ in Article 12 prescribes that no one shall be subjected to arbitrary interference with his privacy, family, home or correspondence, nor to attacks upon his honour and reputation. Everyone has the right to the protection of the law against such interference or attacks. In Europe right to privacy was established in the European Convention on Human Rights (ECHR) was drafted in 1950², and contained an article declaring that everyone has the right to respect for private and family life. Namely, Article 8 of paragraph 1 (ECHR) prescribes that everyone has the right to respect for his private and family life, his home and his correspondence. In the Article 8 paragraph 2 (ECHR) prescribes that there shall be no interference by a public authority with the exercise of this right except such as is in accordance with the law and is necessary in a democratic society in the interests of national security, public safety or the economic well-being of the country, for the prevention of disorder or crime, for the protection of health or morals, or for the protection of the rights and freedoms of others. European Conventions have continued

¹ UN General Assembly. (1948), *Universal declaration of human rights* (217 [III] A), Paris. Retrieved from: <http://www.un.org/en/universal-declaration-human-rights/>.

² Council of Europe, *European Convention for the Protection of Human Rights and Fundamental Freedoms, as amended by Protocols Nos. 11 and 14*, 4 November 1950, ETS 5, Retrieved from: <http://www.refworld.org/docid/3ae6b3b04.html>.

to meet to establish standards to protect the privacy of information from European citizens. Namely, under European Union law, personal data can only be gathered legally under strict conditions, for a legitimate purpose. Furthermore, persons or organizations which collect and manage personal information must protect it from misuse and must respect certain rights of the data owners which are guaranteed by European Union law. The European Union's Data Protection Directive³ also foresees specific rules for the transfer of personal data outside the EU to ensure the best possible protection of personal data when it is exported abroad (Ivanović, 2017:157).

Data archiving has always played a very important role in society. Keeping important information and historical events is invaluable for tracking the exact history of events and guaranteeing that this information will be available to future generations. The society, however, tends to forget important information. Fortunately, in the present stage of digitization of human society, we have an internet that allows us to store huge amounts of data for an indefinite period of time. Namely, as Mayer-Schoenberg points out: "Due to digital technologies, the ability of society to forget is suspended, and replaced with almost perfect memory" (Mayer-Schönberger, 2009:16). On the other hand, it also has its negative effects that are reflected in the loss of the individual's ability to control their personal data in the sense of their archiving and distribution over the Internet. Namely, the creation, collection and distribution of data are ongoing and constant. If we take into account the possibilities of the internet everyday, whether we were aware of it or not, we are generating and transmitting our personal data in many ways. Also, our personal data is collected and shared daily by organizations that manage this mass communication medium. In this way, the data became the "new currency" of the digital age, and it seems almost impossible for us to fully protect our privacy and sensitive personal information in the digitalization era. Namely, while it is very easy for individuals to upload images, comments, videos, etc. on the web pages, on the other hand, it is very difficult for them, and sometimes it is impossible to completely delete these contents from the Internet. In a word, when some information, information or file is uploaded to the Internet, it can have lasting significance, or consequences (Ivanović & Dečković, 2016:478). It's actually about the problem that David Lindsay called "digital eternity" (Lindsay, 2014:290). The problem of the so-called. "Digital Eternity" is important because there is an concerning shared by numerous authors that all we have ever posted on Internet can to persecute us one day. Likewise, something somebody about us in the past lignifiedly announced on Internet in the future can upset or disturb our further life (Ivanović & Dečković, 2016:478). All this makes understanding of privacy and the right to protection of personal data in the digitalization era by quite complicated and demanding issues. Namely, if we understand the concept of privacy as a possibility of protecting and controlling the distribution of personal data, we can conclude that the realization of complete protection of personal data in today's situation is almost impossible. In today's world, the protection of private and family life, the protection of privacy is still in its infancy and is confronted with a plethora of challenges. Photographs and footage can certainly be qualified as personal data according to the rules of internal and European law (Pavlović, 2018:94). When it comes to the question of right to privacy of children situation is more complicated because of digital era of nowadays. Namely, world of today's children has been significantly changed in relation

³ Directive 95/46/EC of the European Parliament and of the Council of 24 October 1995 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, *Official Journal L 281, 23/11/1995 P. 0031 – 0050*.

to the world of their parents. In the world of childhood of today's parents there were no smart phones, computers, laptops, you tube, twitter or various on-line games. Reading and writing were learned first and only later work on a computer came. Today, children are using a computer and a smart phone even before learning to read and write. This fact shows about how the world of today's children has changed in relation to the world of their parents. Today, through the new technologies, the media have entered much not only into our lives, but also into the lives of our children, that it is difficult to imagine the growth of today's children without the media (Pavlović, 2018: 92).

The Convention on the Rights of the Child (CRC) makes clear that children have a specific right to privacy. Tracking the language of the UDHR and ICCPR, Article 16 of the CRC states that "[n]o child shall be subjected to arbitrary or unlawful interference with his or her privacy, family, or correspondence, nor to unlawful attacks on his or her honour and reputation" and reaffirms that "the child has the right to the protection of the law against such interference or attacks." The right to privacy includes a wide range of rights: the right to respect of the private and family life, the right to respect the inviolability of the home, the right to respect the inviolability of correspondence, the right to respect for honor and reputation" (Dimitrijević, 1995). Privacy is also defined as the right of an individual group or institution to determine when, how and to what extent information about them will be communicated to other persons. Although the term "privacy" has been in legal traffic for some hundred years, the issue has "exploded" with the development of information technology and the development of the media. The right to privacy and protection of personal data becomes, theoretically and practically, the center of interest of lawyers in the field of legislation, administration and judiciary

The danger to privacy exists not only from state authorities, private companies, individuals, but also from society in general, and the family itself or its members. The right to privacy enjoys protection regardless of whether it has been violated by state authorities or other legal or natural persons. The state has a dual obligation:

- a) negative - to refrain from violating and endangering the right to privacy; *and*
- b) positive - to protect the right to privacy by providing an adequate legislative framework and accompanying legal mechanisms.

The scope of protection of the right to private life includes the identity and integrity of the person, its intimacy, communication and sexuality. Intima implies a set of private features of a person, his actions and information about him. The disturbance of privacy is the entry into the intimacy of individuals against his will. However, the question that arises is does the publication of photographs and data of children in social media by parents, relatives and other persons constitute a violation of the right to privacy of children?

2. The right to privacy - the apparent right of children in the hands of parents (adults)?

Due to their age and personality characteristics, children depend on adults and enjoy special protection. Their rights are related to basic human rights, but because of the preconditions for children, the findings must be specifically protected. The content of these rights is adapted to the goals that are need to be achieved, such as social security and the proper development of children (Ponjavić, 2005: 229). The achievement of these goals is most relevant to parents, but the country also plays a major role.

During the 20th century, there was a change in the legal arrangement of parents' and children's relationships. The patriarchal model is abandoned, and parental rights are adopted instead of parental authority (Draškić, 1998: 164). The child is no longer treated as an object of law, as a subject of the protection of his parents, but is given the status of the subject, the right holder and, accordingly, the claimant.

From the perspective of right to privacy and protection of security it is not just about photos and video materials, what parents need to think about before sharing their children's photos with virtual friends. Of course, it needs to be careful with data such as the full name of the child, the date and place of birth, the location and everything that could possibly endanger the child's safety, or can be used to steal the child's identity. Also, the question is who has the right to publish something about someone without his consent? Do parents need to seek consent regarding what the child would like to see in the future about himself online? How many parents have asked their children whether they can say anecdote from kindergarten, from a trip, from a park, to friends on a Facebook, which sometimes has several hundred?

How much, after all, the social network user would allow someone to share photos on which they are, without their knowledge or approval. It is possible to protect against possible abuses by not leaving images on which children are naked or those that would reveal to everyone the place of residence. Internet security experts, however, recall that it is extremely difficult to be anonymous online - passwords, photos and all other information can be easily hacked.

Apart from the expectation that their privacy as children will be protected, there is also a question of their privacy as future adults. What happens when a child grows up? If information is available on social media when a child reaches maturity and adolescence, there is material for potential abusers in school, for potential employers, and for the media, if they become prominent figures. If a child whose every intimate moment is photographed, described and published on the Internet develops a public profile, or acquires a political function, his parents have created a file of "dirty laundry" that will exist forever. In the Republic of Serbia, such acts qualify as offenses. For each personal data processing, it is required the consent of the natural person to whom the data is related. The very concept of processing is defined very widely, both in domestic and EU legislation (Directive 95/46 EU).

However, due to the incomplete and outdated Law on Personal Data Protection, it is extremely difficult in Serbia to achieve adequate protection of the right to privacy. Besides that, the question is how would the prosecution handle a situation in which there are no corresponding legal definitions to qualify this act. By posting images of its child on social networks, parents can by negligence cause danger for children security. By publishing photographs or videos on the Internet, the child becomes a potential target of pedophiles, kidnappers or similar criminal profiles. For example, there is a case of attempted kidnapping of a girl in Pancevo Republic of Serbia by a French couple. According to one version from the investigation, the kidnapers chose this girl on the basis of images on Facebook and made a plan to abduct her, and her DNA allegedly planned to go to court in France to prove that the ex-husband of their daughter was not fathers of her daughter because a kidnapping girl looks very much like theirs granddaughter. Of course, this version has not yet been officially confirmed, as there are indications that the kidnappers intended to sell the girl to traffickers. In any case, this scenario is realistic and possible, which is why parents should be aware of the dangers of publishing a picture of children on the Internet with them.

Then next form of abusing of children's privacy on social network is publishing the private information of children's from other adults, relatives, teachers from school or kindergarten, trainers from sport schools. Most parents tolerate such things even though this were done without their explicit permission.

The following way of abuse of the right to privacy of children on the Internet is the disclosure of their data on social networks by peers. In April this year, the media from Serbia, Bosnia and Herzegovina and Croatia published news about the existence of the Facebook page that publishes inexplicable, provocative photos of mostly underage girls. The Facebook page "The Biggest Slut of Elementary and Secondary Schools" was given a lot of popularity every day. In just three days, from April 20 to 23, the site received over 20,500 "likes". At the moment of publication of this text, the site has over 35,000 "likes". Besides the photographs, other personal data such as name, surname, city in which they live are left, and in some cases also the school that the specific person in the picture attends. As the Facebook page became very current in the region, the victims and their parents reported very quickly, presenting the complete dimension of this event. Namely, in most cases, the girls whose photos were on this page themselves have posted them on their Facebook profiles. However, in this way the content was available to a certain user circle (usually their so-called Facebook friends, and in some cases even wider). Persons who had access to photographs took over them and sent them to the administrator of the controversial side. Photos are most often commented on in a sexist, abusive and disparaging way.

And the last way of abuse of the right to privacy of children from the electronic and print media, who, due to the increasing of popularity of its media, publish personal data of children mostly victims of crimes, that is, children who testify to some criminal offense which was happened within the family.

3. Legislative framework and accompanying mechanisms

According to the Law on Personal Data Protection, the Commissioner for Information of Public Importance and Personal Data Protection monitors the implementation of the Law and has the right to point out the detected abuses in the processing of data. Supervision over the implementation and enforcement of this law is carried out by the Commissioner through authorized persons - inspectors. In exercising supervision, an authorized person shall act on the basis of information obtained by him *ex officio*, by the complainant or by a third party. The initiation of a misdemeanor procedure is not the sole authority of the Commissioner. If the administrator of the controversial Facebook party is identified on the territory of the Republic of Serbia, that person shall be obliged to enable the inspector of the Commissioner to conduct the supervision without any problems and to provide him with the necessary documentation and the availability of the necessary documentation. If it is determined during the supervision that the provisions of the laws governing the processing are violated, the Commissioner will warn the operator of irregularities in processing and afterwards may initiate the procedure.

In their report, the Ombudsmen for Children of Southeast Europe expressed deep concern over the frequent occurrence of abuse and abuse of children in the Internet.⁴

⁴ <http://www.djeca.rs.ba/uploaded/CRONSEESTav.pdf>, accessed 14.06.2018.

They warn of the increasing risks that accompany the movement of children to the Internet space and inadequate society's response to them.

They point out that the following measures and recommendations should be adopted, applied and supported at regional, national and local level:

1) Abuse of children in a virtual space is real, therefore the reaction must be adequate;

2) Public authorities should, in cooperation with internet service providers, define strategies and plans for protecting children from violence, abuse and exploitation on the Internet and protecting children from harmful content;

3) Public authorities should, along with the participation of children and young people, devise and implement public campaigns in order to raise public awareness, in particular children and young people, parents and professionals working with children, on the risks of internet violence and on protection and self-protection measures. Campaigns should be focused on raising awareness that children and young people should be sensitive to the confidentiality of personal data and other personal information, and only publish information on the Internet that cannot be misused, nor can they endanger or destroy the child's online reputation and reputation society and peer group;

4) Internet and communication providers and the media should be aware of their significant roles in promoting and educating children's rights and protecting the rights of the child in the information and media space. They need to align their business policies with the principle of best interests of the child and make more efforts to prevent violence against children and their protection against all forms of abuse and neglect;

5) Public authorities should, along with the active participation of children and young people, professionals and providers of Internet and communication services, devise programs for educating children about behavior in the Internet, especially social networks, the importance of online reputation, the way of its preservation and protection, and the mechanisms of protection and self-protection.

4. Right to privacy and modern media

It has never been easier for bullies, sex offenders, traffickers and those who harm children to contact potential victims around the world, share images of their abuse and encourage each other to commit further crimes. Digital connectivity has made children more accessible through unprotected social media profiles and online game forums. It also allows offenders to be anonymous – reducing their risk of identification and prosecution – expand their networks, increase profits and pursue many victims at once. Children's privacy is also at stake. Most children – and many parents – have very limited, if any, awareness of how much personal data they are feeding into the internet, much less how it might one day be used (UNICEF, 2017: 71).

The right to privacy is one of the basic human rights that is violated everyday in domestic media, and especially in the tabloid press. In today's way of life, having a "private life" has become a privilege, it has become an impossible mission. From the profile on Facebook to the appearance in the mass media, the media target is not only the privacy of well-known personalities, but also the anonymous citizens. Robberies, fights, traffic accidents, killings are the most common cause for anonymous individuals, including children, to become the subject of newspaper articles and media content. Electronic media most often violate the privacy of ordinary citizens in black chronicle

shows. In programs that deal with crimes, family violence lists the names, addresses, details of their lives, shows the homes in which they live.

Precise analysis of the relationship between the media and the protection of the right to privacy of the child has not been done, but from the insight into a limited number of printed newsletters (daily newspapers) there are spotted individual but significant examples of direct (full name and surname) or indirect (indication of the name of parent/guardian and address) the disclosure of the child's identity in cases where it was the victim of an unlawful act, blamed or involved in some other way. As a good example of the negligent treatment of the media in terms of violating the rights of the child on privacy, we are referring to the publication of photographs of a naked child on the front page of the most circulating daily in the country. The record was made (and most probably directly delivered) by teachers who secretly photographed an awkwardly guided game in one of the activities of the summer camp in which participants (publicly) were dragged into the group (an incident related to activities in one of the summer camps organized by the Ministry education and sports of the Republic of Serbia) (Brkić, et. al., 2003: 73).

The media are obliged to specifically protect the rights and dignity of children. Their identity and privacy must not be compromised by publishing personal data, family photos or footage.

With the development of communication networks, especially the Internet as a global network or "networks of all networks", the notion of "networked society", a virtual world in which everyone communicates with each was created (Dimitrijević, 2009).

The apparent invisibility and distance creates in people feelings of anonymity and security, and sometimes they give personal information or take actions that in the real world would never have been.

Privacy issues have become a hot practical topic in the conditions of use of information and communication technology and electronic communications. It has created unlimited possibilities for concentration of data, their clustering and search on various features, as well as the possibility of using it by a wide circle of users (Dimitrijević, 2011: 202).

On the other hand, children experience more serious threats to their privacy from a greater range of actors than any other group. Children's privacy online is placed at serious risk by those who seek to exploit and abuse them, using the Internet as a means to contact and groom children for abuse or share child sexual abuse material. Yet children's privacy is also at risk from the very measures that have been put in place to protect them from these threats.⁵

There is a question what sort of exploitation is involved when children, the most powerless group in society, are pictured for the pleasure and delight of adults, who potentially have total control over them?⁶ With photography and film, there always is a real child with a real life behind this image and this person should not be forgotten. This person has agency, and should have some control over the use of his or her representation (Davies, 2010: 23).

⁵ https://www.unicef.org/csr/files/UNICEF_CRB_Digital_World_Series_PRIVACY.pdf, accessed 15.06.2018.

⁶ <http://www.lse.ac.uk/media@lse/events/pdf/IAMCR16/Davies.pdf>, accessed 16.06.2019.

There is an increasing phenomenon that children's photos are published on the Internet or in brochures without the prior consent of the parents. We live in a time when schools and kindergartens have a system of informing parents about what their children do with photos or video content, through the Weber or Facebook group, and the occurrence and publication of famous "selfies" with teachers after competition, or the publication of pictures from the playrooms for the purpose advertisements on Facebook.

Most parents do not know that for the publishing of pictures or videos of their children needs to be given consent, which does not necessarily have to be in writing, but it must undoubtedly exist. Consent must be given by both parents, except in the case when one parent has an independent parental right by a court decision. For the unauthorized publishing of photographs or video material, Criminal Code of Republic of Serbia⁷ in Article 145 prescribes the criminal offense of unauthorized publication and presentation of another's texts, portraits and recordings on the way that: „Whoever publishes or publicly presents another's text, portrait, photograph, film or a phonogram of a personal character without consent of a person who has drawn up the text or to whom it is related, or without consent of the person depicted on the portrait, photograph or film or whose voice is recorded on a phonogram, or without consent of the person whose consent is mandatory by law and thereby significantly violates the private life of that person, shall be punished with a fine or imprisonment up to two year (Article 145 Paragraph 1 CC). „If the offence specified in paragraph 1 of this Article is committed by an official in discharge of duty, such person shall be punished by imprisonment up to three years (Article 145 Paragraph 2 CC)“. Also in Article 146 of Criminal Code of Republic of Serbia is prescribed criminal offence unauthorized collection of personal data on the way that: „Whoever without authorisation obtains, communicates to another or otherwise uses information that is collected, processed and used in accordance with law, for purposes other than those for which they are intended, shall be punished with a fine or imprisonment up to one year. (Article 146 Paragraph 1 CC)“. „The penalty specified in paragraph 1 of this Article shall also be imposed on whomever contrary to law collects personal data on citizens and uses data so collected (Article 146 Paragraph 2 CC)“. „If the offence specified in paragraph 1 of this Article is committed by an official in discharge of duty, such person shall be punished with imprisonment up to three years (Article 146 Paragraph 3 CC)“.

It is important to note that the law allows the use of photographs if they are part of a landscape, a populated place, a street, or if the photograph refers to a concert audience, a set of people or for the purpose of raising funds for humanitarian needs. When it comes to the media, the editor-in-chief who makes recognizable juveniles in a photo that may violate his right or interest may be misdemeanor with a fine of 50,000 to 150,000 dinars.

When it comes to publishing information about children to victims of crime in the media, it should be noted the Juvenile Act of Republic of Serbia⁸ in Article 9 stipulates that without the permission of the court, the course of criminal proceedings against juveniles and decisions in this procedure cannot be published, except what is allowed by the Rulebook on anonymity (Pavlović, Pasca, 2017: 355-366). A provision of similar

⁷ Criminal Code of Republic of Serbia (Official Gazette of the Republic of Serbia br. 85/2005, 88/2005 - ispr., 107/2005 - ispr., 72/2009, 111/2009, 121/2012, 104/2013, 108/2014 i 94/2016).

⁸ Law on Juvenile Offenders and Criminal Protection of Juveniles was published in the Official Gazette of RS no. 85/2005, and came into force on 1st January 2006.

content is contained in the Criminal Procedure Code of Republic of Serbia.⁹ The Law on Public Information and Media of Serbia from 2014, in its Articles 77-78, 101 and 140, refers to the presumption of innocence of minors (Jovašević, 2016: 122), the right to privacy, the protection of the free development of the personality of the minor. Special attention must be paid to the fact that the content of the media and the manner of their distribution does not harm the moral, intellectual, emotional or social development of the juvenile, or that the content of the media should not violate the juvenile's right or interest.

UN Convention on the Rights of the Child, 1989, Article 16. 1. No child shall be subjected to arbitrary or unlawful interference with his or her privacy, family, home or correspondence, nor to unlawful attacks on his or her honour and reputation. Article 40. 1. States Parties recognize the right of every child alleged as, accused of, or recognized as having infringed the penal law to be treated in a manner consistent with the promotion of the child's sense of dignity and worth, which reinforces the child's respect for the human rights and fundamental freedoms of others and which takes into account the child's age and the desirability of promoting the child's reintegration and the child's assuming a constructive role in society.

However, there is a question whether the child's consent for publication is necessary? There is a lack of reference to children's own agency and a lack of attention to the use of images (of children and created by children).

5. Instead of the conclusion

With the aim to addressing question of problem with inherent conflict between a parent's relatives and other adults freedom to publish and a child's right to privacy we can conclude that this issue is pay very low attention in our country, as well as is in neighbour countries. Even if international documents prescribe protection of right of children to privacy, even it is recognized as an criminal act unauthorized publishing of personal data in practice we have situation that such acts exists, that right to privacy of children is abused on internet (mostly social networks) and that there is no adequate reaction nor from parents, nor from the state authorities.

We want to underline special attention to publishing personal data of children on the Internet by parents without their permission. We think that this problem is not paid enough attention, and because of that many parents in the future can face the problem that their children will sue them for the unauthorized disclosure of personal data from their private life.

Also, on the basis of all of the above, we can conclude that because of the huge number of photos, video materials and other personal data of children published on the Internet by their parents or other adults, without any consultation with them, a large number of children will be faced with the fact that in the future time, when they're grown up, they have to use mechanism of the right to be forgotten and demand from administrators of various sites to remove such content.

The emergence of these problems can be prevented by raising the awareness of parents and adults on a higher level of the importance of respecting the privacy of children on the Internet, especially when it comes to sharing their personal information

⁹ Criminal Procedural Code of the Republic of Serbia (2011, 2012, 2013, 2014). *Official Gazette of the Republic of Serbia* (72/2011, 101/2011, 121/2012, 32/2013, 45/2013, 55/2014).

at social networks. Also, it is necessary to raise awareness of children about their right to privacy. All of this naturally imposes greater responsibility for the state to comply with international standards and ensure its effective implementation of its legislation related to the protection of the right to privacy of children in the digital world.

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