

Protection of the privacy of complainants' data in Egyptian law

Legal Paper



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Index:

- 4 Introduction
- 6 Research Methodology
- 7 **Chapter I** : Protection of complainants› data in the Egyptian law
- 9 Protection of complainants› personal data on crimes of sexual violence: article 113 bis of the Egyptian Code of Criminal Procedure.
- 15 **Chapter II** : Analytical comparison of counter legislations on the protection of complainants data within sexual violence crimes.
- 23 Recommendations
- 25 References

Introduction:

Violence against women and girls has become a recurrent crime in Egypt, to the point of transforming into a dangerous phenomenon that threatens women's daily lives and violates their right to physical and psychological integrity.

Sexual violence means any type of sexual abuse against women without women's consent: rape, harassment, sexual exploitation and other criminal acts of a sexual nature. While women are subjected to such crimes in public and private settings - 1006 violent offences according to the annual report of the Observatory for Violent Crimes against Women in 2022¹- cyberspace and its applications are not without such practices. The Observatory's report indicates that these figures are not indicative of the true scale of crimes of violence against women, as they reflect crimes that have been formally reported only, while the facts of violence that have been monitored by women's institutions and initiatives amount to an untold extent.

While survivors of sexual violence crimes face many legal and societal challenges, the incidents of leaking their data pose serious threats of damage that involve breaches of privacy and diverting their crimes as media attractions and extend to stigmatization and intimidation by society and the media.

This happens in an absence of any restrictions from the State - including the law enforcement authorities involved in the preservation of personal data - to prevent the leak of complainants' data in cases of sexual violence. This paper aims to analyze the frameworks and legislation for protecting the privacy of the complainants' data in

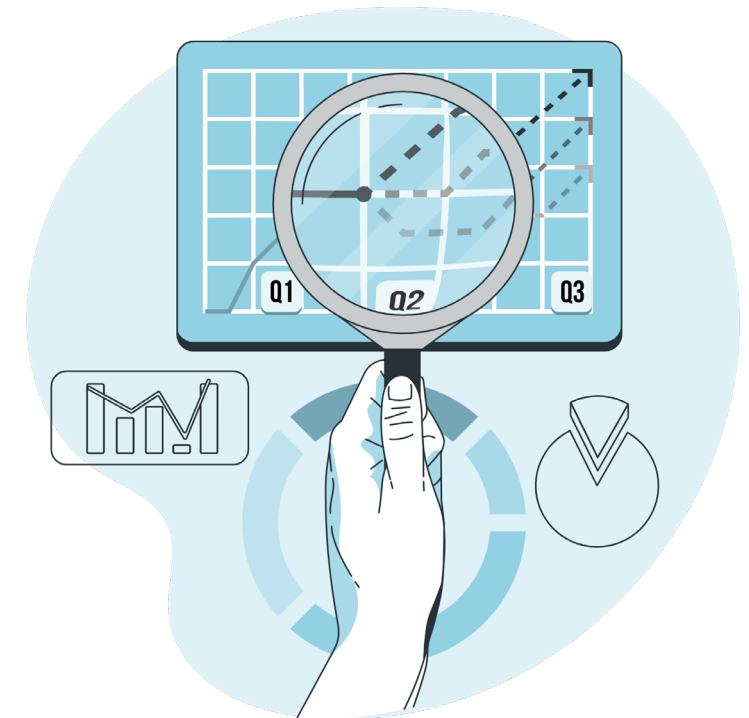
Egyptian law and to highlight the consequences of this violation for the survivors› persons and society as a whole. It also aims to address legislators and decision-makers to review these frameworks to ensure The survivors› justice and protection are achieved.

The gravity of the violation of privacy is emphasized per international Covenants and Conventions, such as the Universal Declaration of Human Rights, article 12 of which stipulates: «No one shall be subjected to arbitrary interference in his private life, in the affairs of his family, home or correspondence, nor to campaigns affecting his honour and reputation. Everyone has the right to be protected by law from such interference or campaigns. Similarly, Article XVII of the International Covenant on Civil and Political Rights states: «No one shall be subjected, arbitrarily or unlawfully, to interference with his privacy, family, home or correspondence, nor unlawful campaigns affecting his honour or reputation. Everyone has the right to be protected by law from such interference or prejudice. « Article IV of the African Charter on Human and Peoples› Rights also refers to the inadmissibility or arbitrary deprivation of this right. In the same vein, the European Convention on Human Rights affirmed the right of everyone to «respect for his private and family life, home and correspondence.»

The articles of the Egyptian Constitution included ruling texts guaranteeing the protection of the right to privacy and safeguarding the dignity and inviolability of citizens, as reflected in articles 57 and 59. Article 57 states: «Privacy is inviolable and untouchable. Postal, telegraphic, electronic, telephone conversations and other means of communication are inviolable. Confidentiality is guaranteed and may be confiscated or accessed only by a reasoned judicial order. « Article 59 states: «A safe life is the right of every human being. The State is committed to providing security and peace of mind to its citizens and every resident of its territory.»

Research methodology :

The research uses the analytical description and comparison mechanisms as a practical framework for the study of article 133 bis of the Egyptian Code of Criminal Procedure on the protection of victims' data, with a view to measuring the efficiency of the text in achieving the purpose of the legislation. The analysis is divided into several axes through which we address the scope of application of Article 113 bis and problems related to its application. The paper applies the analytical comparison mechanism to data privacy protection texts in Egypt's legal system, as opposed to similar legal texts in some States.



Chapter I

Protection of complainants' data in the Egyptian law

Based on the foregoing legal grounds guaranteeing the right to privacy and the sanctity of private life¹, the following chapter sets out the legislation on the protection of victims' data in Egyptian law. We highlight the phenomenon of personal details leaking, as well as the damages affecting survivors when their right to privacy is violated.



- **First:** To agree on a common understanding of the principle of privacy and its applications, we refer to the following legal definition «That is the particular framework or area in which a person feels safe and reassured away from the eyes and hearing of others and free from interference or censorship where he enjoys familiarity and tranquillity. No other person can enter or pursue him in said space without his permission. The assurance that others do not breach his secrets nor interfere with the details of his personal life and access his confidential and intimate data. His right to respect for all aspects of his privacy, whether material, moral or related to his freedoms. And in not being pursued by others in his private life and disturbing his peace. the right to protection of his name, honour, consideration, correspondence, contacts, professional and family life and everything that may affect his personal life. The information

given, including his home and telephone number, is included in the concept of private life⁷.»

- **Second:** The responsibility for preserving sexual violence survivors' details lies with the various legal authorities and investigators who account for privacy protection of the litigation parties safe from leakage and violation. Thereby preserving the survivors' privacy, and the sanctity of their personal life, and physical and psychological integrity. It is also the responsibility of the security authorities to ensure additional protection for survivors after reporting sexual violence crimes, given the threats and risks of retaliation.
- **Third:** Incidents of leakage of personal data belongs to complainants of sexual violence offences have increased from evidence transcripts in police stations, often prosecutions: residence, telephone number and other data facilitating access to the victim. As a result, the survivor is subjected, by the accused or his family, to emotional blackmail, threats of psychological and physical abuse, defamation and slander. As a result, dissuading many survivors from invoking the law from the outset, and responding to threats and withdrawing the complaint by waiving the police report or the case if it is referred to the prosecutor's office. It should also be noted that the culture of survivors blaming is deeply rooted in our society and contributes to the severe consequences of leaking the complainant's data in the public sphere, or to the complainant's own family.
- **Fourth:** Maintaining data confidentiality Plays a key role in promoting justice and trust in the justice system. It provides a framework of protection that allows for the removal of obstacles and apprehensions and further encourages victims of sexual violence crimes to resort to legal avenues and access to the judicial system. It also increases the readiness of witnesses to testify in these incidents, who often fear reprisal and persecution from the accused and his relatives.
- **Fifth:** The number of documented testimonies about the incidents of survivors' data leaking -during the reporting, investigation and litigation phases- have increased, as have attacks and crimes that have threatened their security as a consequence of that. Accordingly, women's organizations have intensified efforts to demand a law protecting the data of survivors of sexual violence, as well as providing and guaranteeing protection to complainants and witnesses to ensure the physical and psychological integrity of all of them. These efforts have culminated in the Egyptian legislature's response to resolving this legal flaw and addressing the risks of leaking the complainants' statements: it enacted Article 113 bis of the Egyptian Code of Criminal Procedure.

Protection of complainants› personal data on crimes of sexual violence: article 113 bis of the Egyptian Code of Criminal Procedure.

First, legislative powers - on the 5th of September 2020

promulgated Law No. 177 of 2020,

under which the article was annexed (113 bis) The Criminal Procedure Act No. 150 of 1950 stipulates that: «No victim›s statements may be disclosed by the police officers or by the investigating authorities in any of the offences outlined in Title IV of Book III of the Penal Code promulgated by Act No. 58 of 1937 or in either article. (306 bis A) and (306 bis B) of the same Law, or in Article (96) The Children›s Act promulgated by Act No. 12 of 1996, except for persons of interest.»

Second: The text of the article refers to the considerations established by the Egyptain law to protect the complainants› data as follows: -

- Safeguarding confidentiality and non-disclosure of victims› data: Police and investigators must keep victims› data confidential and not reveal it nor use it illegally or unlawfully.
- The article specifies the offences in which the complainants› statements may not be disclosed, given their conditionality and the threat before the victims upon disclosure of their statements in these cases. These are (article 269 of the Penal Code the offence of rape, and Article 268 the offence of indecent assault. Article 306 offences against others, article 306 bis (a) offences of sexual harassment and article 96 of the Children›s Act - offence of endangering a child).



Analysis of Article 113 bis of the Egyptian Code of Criminal Procedure

Article 113 bis came as a positive response to the tireless appeals and demands of feminist organizations and activists for the protection of complainants and witnesses in sexual violence crimes - as explained - but the legislation does not provide the necessary protection guarantees for survivors, as well as several problems that we will address in detail in this section of the report.

First: the purpose of the legislation was not achieved in the text.

Since the purpose of the legislation is to protect and reassure survivors during the reporting and investigation process, disclosure of data- to the family and relatives of the accused-, who are persons of interest as the Article suggests, then becomes contrary to the fundamental purpose of the legislation.

Second: Data protection procedures have yet to be defined.

The article overlooked the tools by which, it intend ito protect personal data: such as blurring names, addresses and personal data, or separating personal data from investigative papers, thereby facilitating the removal and blurring of data within the invitation paper - according to a media statement by the President of the Court of Appeal. In the absence of a determination of the procedure governing third parties› access to the complainants› data and guaranteeing «non-disclosure» of data prohibited by the



article, the organization of that process would be left to the judicial officers and investigators according to their judgment, which was already in force before the legislation. And so the legislator had to mention the method.

Third: It is, only, the protection of survivor>s data has been legislated, not the survivor>s protection.

The text of the article explicitly refers to the prohibition of disclosure for survivors> data except to persons of interest, while failing to address certain legal proceedings, which are misused as a form of threat and pressure on survivors, for example, the reverse record.

Fourth: The identification of persons of interest has been left to the judicial officer and investigators.

The article prohibited disclosure «except for persons of interest», and did not specify who those deemed of interest were (are they only the parties to the proceedings litigated: from the complainant, defendant and civil rights plaintiff? And could the defendant>s parents be of interest?). To demonstrate that confusion, we ask what if the accused is a «child» when the parents or guardians are of interest? thus the disclosure of the survivor>s statements to them would constitute a grave threat to the physical and psychological safety of the survivor.

Fifth: ambiguity of the term « persons of interest », and the dangers of such ambiguity.

At a time when the article prohibits access to data for “non-persons of interest”, we cannot lose sight of the fact that it is said persons of interest are the ones often most in pursuit of such data and attempting to use it to threaten the survivors. In many instances, it is well known that access of the accused or his relatives and any related persons; to the survivor>s residence and telephone number entails - direct -

pressure, intimidation and threats on the survivor to retract the complaint. The primary purpose of the legislation, namely to protect the survivor, ensure the survivor's privacy and safeguard her safety, is thus eliminated.

Sixth: The risk of access of «persons of interest « parties of the litigation to all personal data.

It is known that the defendant has the right to know about the complaint. However, this does not warrant him to be informed of the complainant's statements, which concern only the Public Prosecutor's Office, as an investigative agency, data such as a home address, telephone number and national ID number, the Public Prosecutor's office uses such data to ascertain the validity of the proceedings, the plaintiff's statements, and to complete the proceedings and official communications. On the contrary, there is no justification for the litigation parties' access to such personal data, but it opens the door to the persistence of the dangers and threats mentioned in the preceding article.

Seventh: The text is free of classification of prohibited data.

The article left the estimate of the data to be blocked from disclosure unidentified, and up to the judicial officer and prosecution office judgement; so that personal data from the telephone number, housing addresses, and even age, would be subject to leakage. and It's data that doesn't even concern anyone, even « persons of interest.».

Eighth: The legislation is void of penalties for violation of legislation.

The article does not refer to any penalties arising from a breach of the law and the leak of the complainants' personal details by the judicial officer or the investigator. Thus, the facts of the violation of

privacy do not entail any criminal sanction. Notwithstanding the legislature's statement of the mandatory qualification on the act of leaking data by using terms like -- prohibited -- «may not», the absence of punishment or penalty for violators makes the legal text an indicative and non-mandatory text and does not address the risks of leaking data -- the object of enactment of the law -- which as we have detailed how it places the complainants under direct threat and harm.

Ninth: The prohibition is regulating the reporting and investigation phases; while overlooking the judicial sentencing phase.

The article has jurisdiction over the limited, timely phases of reporting and investigation and has not addressed the trial stage, despite the gravity of disclosure of data during sentencing. The legislature relied on the fact that the hearings are confidential by the nature of trials for crimes of sexual violence, yet neglected the “principle of openness of judgment”: for which the judgement, its pronouncement, and its writing were a duty of publicity under the law. Moreover, the judgments are pronounced in the people's name, and therefore there is nothing to prevent any citizen from accessing the text of the judgement, details of the facts, including the personal data of the survivor, of course.

We cannot conclude the commentary here without emphasizing the nature of the danger to survivors amid a societal culture characterized by stigmatizing and intimidation, which considers it “a taboo” if talking about sexual assault crimes, and the consequential stigma from the leaking of the complainant's statements to the public, for merely relating to a case of sexual assault.

Tenth: The law did not address the protection of witnesses› statements

Contrary to what lawmakers said in the course of the social debate, and on media Channels, about ensuring amendments to the protection clauses of the complainants›, and witnesses› statements, the article does not contain clear clauses guaranteeing the psychological and physical protection of the complainants, or a clear witness protection program as applied in many corresponding legislation as we will review in chapter II.

Chapter II

Analytical comparison of counter legislations on the protection of complainants data within sexual violence crimes.

Since the issue of protecting the complainants' privacy was central to ensuring justice and protection for survivors of sexual violence cases, there was an urgent need to take effective legal measures to ensure the guarantees of confidentiality and full respect for the sanctity of private life.

This chapter discusses several legal acts that have addressed this issue, focusing on the essentials of protecting survivors, in varying approaches and details. The degree of protection varies from one legislation to another. While some laws provide robust safeguards to protect the complainants' privacy, such as encrypting data, blurring the identity and personal information of the complainants and providing adequate measures to prevent retaliation or punishment, other legislative models require strong evidence to support the prosecution's validity, thus exposing the complainants to further risks and challenges. The various guarantees provided by the law differ but all the laws were consistent with the principle of protection and justice.



Laws for the protection of complainants, witnesses and victims of crimes.

According to the principle of «the right to report and testify as a right of expression», lawmakers agreed that laws and protection programmes for witnesses and complainants should be enacted to ensure protection against all forms of risk that impede their recourse to the relevant justice institutions, prompt them to misrepresent or reverse their testimony, and that protection programmes for victims and survivors are similarly established.

That legislation was based on the governing principle that citizens right to report abuses was a natural extension of the right to freedom of

expression and was directly linked to the principles of transparency and impartiality and that all citizens had an inherent right to protect the interests of other citizens and society as a whole, more so; in some cases, it is their duty to report abuses. Protection programmes for complainants and witnesses are part of criminal laws in some legislation, anti-corruption laws in others, and some states in the form of separate legislation.



Principles for the protection of complainants, witnesses and victims of crimes in international conventions

International conventions have demonstrated the importance of protecting witnesses and their effective role in combating crimes, as well as the risks to them and the complainants as a result of testifying, and any possible subsequent prosecution and physical and psychological abuse and intimidation [10]. Article 24 of the United Nations Convention against Organized Crime of 2000 states: «Each State Party shall take appropriate measures

within its means to provide effective protection from potential retaliation or intimidation for witnesses in criminal proceedings who give testimony concerning offences covered by this Convention and, as appropriate, for their relatives and other persons close to them.»

In the second paragraph, the Convention recommends measures and rules for physical protection: such as the change of residence, anonymity of identity and personal data, as well as procedures for facilitating the presentation of testimony, reporting to witnesses through various means of communication and ensuring that they are confidential and secure:

- Establish procedural rules for the physical protection of such persons, such as, to the extent necessary and practicable, changing their places of residence and, where appropriate, allowing the restriction on the disclosure of information about their identity and whereabouts;
- Provide evidence-specific rules allowing testimony to be given in such a way as to ensure the witness's safety, for example by allowing testimony to be given using communications technology, such as video links or other appropriate means.

The Convention, which affords legal protection to victims of the same offences, mainly as witnesses, afforded them the same protective safeguards «The provisions of this article shall also apply to victims as witnesses.» Several national laws have taken inspiration from the Convention's principles in their legislation, as in the American and Canadian Witness Protection Programme.

United States Witness Personal Data Protection Act ¹¹:

The law stipulates that the confidentiality and privacy of information concerning witnesses, complainants and authors of reports must be preserved, particularly in crimes of sexual violence. The Act prohibits unauthorized access to data and provides safe accommodation for witnesses and complainants, depending on the level of risk to which they are exposed, which in some cases amounts to a change of identity and by extension the place of residence and employment.



Canada's Personal Data Protection and Witness Privacy Act ¹²

Canada's Witness Protection Programme ensures protection for persons at risk, while reporting or attesting to crimes, ensuring their safety against any assault or prosecution. The programme includes victims, survivors of crimes, criminal reports registrations and witnesses.

The Act requires the explicit consent of the parties concerned to enjoy safeguards of protection, including the modification or concealment of personal data, and emphasizes the security of such data and the denial of unauthorised parties' access

For victims and survivors of sexual violence crimes, the Canadian Government has passed a separate «Charter of Victims' Rights» legislation in which it has approved several considerations for their protection and the protection of their data: these include prohibiting the publication of any details relating to their case, enabling them to testify on television in a closed circuit of the court, enabling them to accompany a person of confidence to her, as well as enabling survivors to know all the details of the accused, and his progress in the remediation programme. And, if he is released, she must then be informed of the date of release, his whereabouts and his route.



Iraq:

Iraq has enacted a law for the protection of witnesses, experts, complainants and victims. Article six of the law stipulates the measures taken to provide such protection: alteration of personal data while retaining assets, surveillance of the telephone, presentation of testimony and statements by electronic or other means, such as changing the voice or concealing facial features or otherwise.



It also provided for the security of the protected persons as well as temporary accommodation. It also mentioned the provision to change the workplace temporarily or permanently in coordination with the employer if they are not a party to the case or, in coordination with the Ministry of Finance. In addition to those measures, the law guarantees the concealment or alteration of identity in the case's records and the protection during the transfer-to and from the court.

Jordan:

The Jordanian law includes a programme for the protection of witnesses and complainants [15]. Although it is limited to corruption offences only, we shall be guided here by the provisions of Article 10 to indicate the measures made available by Jordanian legislation for the protection of witnesses and complainants. It is as follows:



- Concealment of the name of the witness/complainant all their relevant data, and all evidence of their identity, and replace it with symbols or an irrelevant structure.
- Change to their telephone numbers or monitoring of them at the request of the owner.

- To change their place of residence, place of business or both, temporarily or permanently, and to provide appropriate alternatives depending on the circumstances.
- Take measures to ensure Their safe movement, including attendance at trial and investigation hearings.
- Protection of his home and property from any assault.
- Provide them with a 24-hour emergency telephone number to receive relief requests.
- Any action or measure authorized by the Council

Tunisia:

Tunisia's national legislation is in line with Jordanian legislation in terms of limiting witness protection programmes to corruption offences. Chapter 25 provides for measures taken to protect witnesses:

1. Provide personal protection to the complainant, in coordination with the relevant public authorities.
2. The complainant is transferred at his request, or after his consent, from his place of business as required by the necessity of protection.
3. Provide legal and psychological guidance.
4. Provide means of prompt reporting of any threat to them, or to any person with whom they are closely connected, on the occasion of the testimony, complaint, or following them.
5. Amend the protective procedures in any way as required by the witness's interest.
6. Take any other measures to prevent any occupational, physical or moral harm.



Egypt:

Egypt is one of the States that have ratified the United Nations Convention against Organized Crime [16] by Presidential Decree No. 294 of 2003 on the approval of the United Nations Convention against Organized Crime, adopted by the Palermo Diplomatic Conference in Italy from 11 to 15 December 2000.

However, Egypt did not adopt a specific law for the protection of witnesses and report authors, but the legislator merely promulgated article 113 bis of the Code of Criminal Procedure, which is discussed in detail in the previous chapter, indicating its apparent failure to protect survivors and its inability to achieve the goal for which it was enacted.



It is important to emphasize that ratification of the United Nations Convention is binding on its implementation, as stated in Article 151 of the 2014 Constitution of the Arab Republic of Egypt: «The President of the Republic shall represent the State in its foreign relations, conclude treaties, ratify them after approval by the House of Representatives and have the force of law after publication in accordance with the provisions of the Constitution.» However, we cannot affirm the Convention's effective operation in the absence of a national law for the protection of witnesses and complainants, which is enforceable and applied by a separate security department that ensures its enforcement and the operationalization of protection mechanisms.

Combined Unit for the Protection of Women from Violence [17]:

The Egyptian Council of Ministers issued a decision to establish the combined units for the protection of women from violence under the Presidency of the Council of Ministers to receive communications and complaints about violence against women cases. Therefore, taking legal action to examine them, and then coordinating with the ministries and relevant authorities to enable survivors to file and follow up their complaints through a single

institution to facilitate procedures and ensure the protection of survivors' rights. There is the headquarters of the Violence Protection Unit in Cairo, which has several branches in the governorates.

The Unit provides several services in support of survivors: provision of safe accommodation during investigation proceedings, and provision of legal, psychological and social support to survivors. Through representatives of the Ministries of Justice, the Interior, Health, Population, Social Solidarity, the Public Prosecutor's Office, the National Council for Women, and the National Council for Children and Motherhood. In addition, the decision requires the establishment of a database in each ministry or entity, represented by the Unit, documenting all information and details on issues of violence against women, from sentences handed down to accused persons and victims, allowing for the exchange of data between the relevant authorities for the exercise of their competence.

The absence of mechanisms for monitoring and evaluating these units, and their effectiveness in targeting violence against women and protecting women's privacy in the litigation stages of reporting and investigation for prosecution, should be noted.

Recommendations

- The investigating and reporting authorities are obliged to bring article 113 bis of the Code of Criminal Procedure in a manner that guarantees its application and achieves the levels of privacy protection required for complainants in cases of sexual violence. We also recommend that penal sanctions should be applied to offenders for their implementation.
- Establish prosecutor's offices to investigate and adjudicate crimes of sexual violence to reduce the length of litigation and expeditiously decide on such sensitive cases.
- To provide the necessary protection, appropriate for survivors, during the various stages of investigation and litigation, we suggest that:
 - Increase the number of safe houses suitable for women, distribute them equitably among the Republic's governorates and cooperate with civil society organizations in training women domestic workers on how to deal with survivors.
 - Increase the number of units assembled to protect women from violence and equitably geographically distribute them by establishing units in all governorates and not merely in the greater Cairo governorate.
 - Protecting survivors during and after the report of the complaint of the act of assault, amending the article by adding a clause prohibiting the accused of sexual violence offences from legal manipulation, and drafting a report against the complainant's extortion coupled with the practices of intimidation until her complaint is withdrawn.

- Issuance of internal regulations to regulate the functioning of women's protection units against violence, ensuring support for survivors. In addition to activating a hotline for receiving reports, special rescue units specialised in arrests for violence and assault crimes so that the police forces can move to the place where the incident occurs quickly and efficiently.
- Increase awareness-raising efforts on the role of and support offered by women's protection units against violence, and publicize their whereabouts and how they can be accessed to receive services to support survivors of sexual violence.
- Enact a law on the protection of witnesses and Criminal Report authors, that guarantees the protection of information and data on survivors and witnesses of sexual violence offences and takes into account their privacy, guided by international laws and conventions.
- Establish a mechanism to monitor and evaluate women's protection units against violence by relevant government agencies and to involve civil society and women's institutions in evaluations.

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