



Data Protection Compliance in Digital Archives: The Right to be Forgotten

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ABSTRACT

Personal Data Protection No. 27 of 2022 grants data subjects the Right to be Forgotten (RtbF), which may conflict with archival principles. This study examines how data privacy consultants navigate these challenges while ensuring compliance. This research aims to examine how data privacy consultants understand and address the challenges of implementing personal data protection, specifically RtbF, in archive management. A qualitative descriptive method was applied through interviews with three data privacy consultants from a public accounting firm in South Jakarta. This study found that data privacy consultants encountered ambiguity surrounding regulations, business requirements, a lack of understanding among human resources, and various technical issues during implementation. These consultants proposed temporary solutions to balance RtbF within archives management, such as anonymization, soft deletion, and adjustments to archiving retention policies. 'Forgetting' in archives is one of the controversial aspects in RtbF. Therefore, harmonization is needed between the two overlapping regulations. Due to the critical role of privacy consultants over such regulations, it is important for them to comprehend the principles of archives management in order to provide good and balanced recommendations.

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ARTICLE INFO

Article History:

Submitted/Received 12 Oct 2025

First Revised 18 Oct 2025

Accepted 25 Oct 2025

First Available Online 01 Nov 2025

Publication Date 01 Nov 2025

Keywords:

Archives management,
Data privacy consultant,
Personal data protection,
Regulatory compliance,
Right to be forgotten.

1. INTRODUCTION

After a transition period following the enactment of the Personal Data Protection (PDP) Law two years ago, the regulation officially came into full effect in Indonesia on October 17, 2024. As a result, the sanctions outlined in the regulations will be enforced against those who violate them (Bahary, 2025; Rizqiyanto, 2024). The primary aim of this regulation is to guarantee the basic rights of Indonesians regarding personal data protection and to ensure individuals' rights regarding the use and sharing of their data by third parties (Undang-Undang Republik Indonesia Nomor 27 Tahun 2022 Tentang Pelindungan Data Pribadi, 2022). The implementation of this regulation is expected to motivate all parties involved in managing personal data to comply with it, thereby protecting individuals' privacy rights and preventing violations.

As the regulation is relatively new in Indonesia, a lack of widespread socialization has made it challenging for many organizations and the public to fully understand its implications. Beyond merely satisfying government mandates and avoiding the risk of civil, criminal, or administrative penalties, compliance with these regulations can also enhance an organization's reputation and bolster public trust (Angraini et al., 2024; Zahwani & Nasution, 2023). Consequently, many organizations are beginning to review and implement PDP regulations within their business activities, often seeking guidance from data privacy consultants to ensure correct comprehension and application of the requirements necessary for compliance.

The role of a consultant is to assist and provide guidance to clients (organizations) in meeting regulatory requirements while ensuring that they understand the associated risks. Specifically, data privacy consultants help organizations achieve privacy compliance and ensure that clients fully grasp the regulatory issues related to personal data protection. Data privacy consultants assist organizations in developing privacy policies that comply with privacy regulations and in reviewing their compliance status to align with PDP laws (Galea, 2017; Klymenko et al., 2022).

Consultants must possess knowledge of business operations to enable organizations to implement solutions that adhere to regulations effectively and appropriately concerning their (Galea, 2017; Kumvilai et al., 2024). This includes understanding the overlapping regulations pertaining to personal data protection with other information management in the organization, such as archives management. In archive management, one of the core activities is records disposal. According to National Archives and Records Administration, disposition is an integral part of archives management and is the third and final stage of the life cycle of records. In the life cycle concept, records go through three basic stages: (i) creation (or receipt), (ii) maintenance and use, and (iii) disposition.

Disposition is a comprehensive term that includes destruction as well as other actions, such as the transfer of permanent records to the National Archives. Records disposition is the final stage of an archive after it has reached the end of their retention period in active and or inactive storage. He asserts that records may be transferred to an archive for retention, or they may be destroyed. In every organization, preservation and disposition of recorded information are critical concerns that must be governed by formalized policies and procedures rather than the discretion of individual employees (Ramanda, 2015; Saffady, 2021). Record retention policies and implementation procedures are core components of a systematic archives management program.

A practice known as archive retention involves scheduling the storage and destruction of records, serving as a guideline for archive activities ([Undang-Undang Republik Indonesia Nomor 43 Tahun 2009 tentang Kearsipan, 2009](#)). Disposal and retention activities are relevant to PDP and also encompass an individual right as established in the regulation: the Right to be Forgotten (RtbF). This right allows individuals to request the deletion of their personal data from the organizations managing it ([Mbah, 2022](#); [Sarkar Ghosh, Mishra, & Pradhan, 2024](#)). According to Article 26 of the PDP Law, personal data managers are obligated to delete information about individuals upon request and provide a mechanism for such deletion.

This situation raises concerns since retention activities are outlined in two regulations, yet their application and concepts differ. Data privacy consultants must fully understand this distinction to provide clear guidance to organizations in achieving compliance with both PDP regulations and archival regulations. Personal data is defined as information about individuals that can be identified either directly or indirectly, through electronic or non-electronic systems, by integrating or linking specific data with other information ([Undang-Undang Republik Indonesia Nomor 27 Tahun 2022 Tentang Pelindungan Data Pribadi, 2022](#)). In agreement, IFLA-ICA stated that archive inevitably contain personally identifiable information (PII), which can identify individuals and provide context about them ([IFLA, 2020](#)). Therefore, managing information and archives preservation must align with policies regarding access to personal data.

Thus, it is crucial for consultants to possess this understanding and knowledge to effectively advise organizations, enabling them to implement PDP compliance and archives management simultaneously without conflicts, thus mitigating the risk of lawsuits and policy violations. Previous studies have explored research related to privacy, especially in archives management within the digital era. It has also been noted that the RtbF may contradict the purpose of archives, which is to maintain historical information for long-term transparency ([Fachmi & Inamullah, 2024](#); [Henttonen, 2017](#)).

Previous studies have established a conceptual and empirical basis for understanding the Right to be Forgotten (RtbF) in the archival field. However, the central argument emerging from recent research is that academic research on RtbF in archival contexts remains limited and underdeveloped. Bibliometric analysis using the open-access database Dimensions.ai and the subscription database Scopus shows that research themes discussing RtbF in the context of archiving are still limited and have not developed significantly ([Fachmi, Yudhanto, et al., 2025](#); [Fachmi & Grataridarga, 2023](#)). Fachmi and Inamullah, through argumentative literature review, underscore the need for integrating RtbF principles with the archive retention policies, emphasizing that synergy is required so these frameworks can complement each other ([Fachmi & Inamullah, 2024](#)). Additional quantitative research by Fachmi highlights the essential synchronization between RtbF and PDP, observing that although 90% of P3RI members acknowledge PDP's importance, only 48.5% support RtbF in the archival practice, with an average perception score of 3,3182. However, research using a discourse analysis approach regarding control over personal archives through Michel Foucault's perspective shows that personal archives are viewed not only as objects of information but also as representations of private rights that need protection within the framework of personal data protection ([Fachmi, et al., 2025](#)).

Based on this previous research, a pertinent question arises: How do data privacy consultants perceive the archives management in relation to protecting personal data in accordance with RtbF? This is an intriguing topic for discussion, as there is still limited discourse on this theme within the field of archiving in Indonesia. Therefore, this study aims

to provide new insights and contribute to both academic knowledge and practical understanding of the role of data privacy consultants in assisting organizations with compliance to RtbF regulations and effective archives management.

2. METHODS

This research uses a qualitative descriptive method, which was chosen to effectively describe the results obtained from field of observations (Creswell & Creswell, 2018; Colorafi & Evans, 2016). The aim of this research is to explore and understand archives management in personal data protection activities through the lens of data privacy consultants. The research takes place in a public accounting firm located in South Jakarta. This research involves three participants who have experience as consultants, assisting clients (service provider organization), in understanding, implementing, and complying with personal data protection regulations. The informants selected for this research are as follows: Riko, 26 years old, serving as the Lead Data Privacy Consultant; Arum, 23 years old, acting as an Associate Data Privacy Consultant; and Ima, 23 years old, taking role as an Associate Data Privacy Consultant. The names provided are pseudonyms. These three informants were chosen based on their qualifications to support the smooth execution of the research.

This research uses interview technique for data collection which was carried out directly with existing sources, allowing for in-depth information on the topic. To ensure the formality of the questions, the researchers developed an interview guideline as a data collection tool. The interviews followed an organized guideline designed to facilitate the process and align with the research objectives (Moleong, 2022). To enhance the accuracy and validity of the research findings, a triangulation method was used, incorporating approach triangulation, data source triangulation, and data collection triangulation (Meydan & Akkaş, 2024; Turner, 2015). After collecting the data, it was reduced, presented, and analyzed to draw conclusions and obtain a clearer and more comprehensive understanding of the phenomenon being researched.

3. RESULTS AND DISCUSSION

3.1. The Understanding on Archives and RtbF Concept

To implement good governance in business practices, compliance with regulations is essential. This obligation aims to mitigate risks and enhance integrity, helping to avoid sanctions, fines, and even the revocation of operational permits (Tanjung, 2023; Efunniyi, 2024). Adhering to these regulations is crucial for achieving organizational goals effectively by ensuring that all members have a synchronized understanding of their roles in business activities. When compliance is maintained, the organization's operations function smoothly; however, a lack of compliance can impede the achievement of business objectives (Sadiq & Governatori, 2015; Sunarto et al., 2020).

Therefore, adhering to applicable laws and regulations is a requirement, and non-compliance can lead to significant consequences and sanctions, whether from existing or new regulations. For instance, the Personal Data Protection Law No. 27 of 2022 states in Article 2 that both organizations and individuals must comply with its provisions. Additionally, regulations highlight the importance of archives management as part of good administrative practices and governance responsibility. The Archives Law No. 43 of 2009 mandates that

organizations, communities, and governments conduct archiving in a systematic and responsible manner.

There are still many legal entities, business players, and the public who do not yet know the provisions and implications regarding the new regulations, especially the PDP Law (Bintarawati, 2024; Rahman, 2025). Thus, many organizations want to comply with the regulations and use the services of data privacy consultants to ensure compliance with these regulations. The main role of the consultant is to provide explanations related to the requirements and assist in meeting compliance with regulations applicable to the company using their services/client. Hence, data privacy consultants must have a comprehensive knowledge and understanding regarding the business operations and regulations, such as the understanding regarding data subject rights, namely RtbF and archives management (Kumvilai et al., 2024; Owen, 2021). Because in its practices, archival regulations that regulate the retention and destruction of archives must be in line with the fulfillment of individual rights as stated in the PDP regulations.

For this reason, Data Privacy Consultants must provide the right direction, so that clients can comply with both regulations and implement good governance. Moreover, data privacy consultants can provide feedback related to one of the subject data rights, called RtbF. Since RtbF is one of the most important concepts related to individual rights, it gives individuals the right to delete their information managed by the organization, both in electronic and non-electronic form (Teixeira da Silva & Nazarovets, 2023). This opinion is in line with the opinions of the three informants, related to the understanding of the rights of data subjects, namely RtbF.

“RtbF is part of the data subject’s rights, where personal data that has been stored and managed by the organization can be requested to be deleted. The data subject has the right to submit a request to the organization so that one’s identity can no longer be identified, and the organization loses the ability to recognize or link the information data with the individual concerned” (Riko, Interview, January 10, 2025).

“Personal data owners have the right to request for the deletion of one’s data to all parties managing the data” (Arum, Interview, January 10, 2025).

“This right is held by the personal data subject when one’s data is no longer used in the business process. Initially, the data subjects have given consent for the use of one’s data, but for some reason or another, they have the right to revoke the consent. Therefore, the company is obliged to stop using and delete the personal data stored” (Ima, Interview, January 10, 2025).

Regarding the connection with archive activities and data subject rights in the personal data protection activities called RtbF, these informants also provide information related to their understanding of archives.

“In archives, there are two types, they are static and dynamic archives. When data has exceeded its storage period, it enters the archiving process. However, many companies still struggle to understand this distinction and often differentiate between electronic and physical archives, despite the fact that both follow the same management principles” (Riko, Interview, January 10, 2025).

“The data stored in the company but is no longer used daily in the business process” (Ima, Interview, January 10, 2025).

“Archive are documentation that is no longer used in day-to-day operations, but is retained for specific purposes” (Arum, Interview, January 10, 2025).

In terms of understanding, the information presented by the informants is quite accurate because archives are the result of documentation of human activities which are stored because they have long-term value. Archives produced in the daily lives of individuals and organizations provide direct insight into past events (ICA, 2025). However, the information from Riko stated that there are many organizations that cannot distinguish the form of archives, whereas according to ICA, archives have various formats, such text, photos, videos, sound, and in analog/physical/printed and electronic forms. This discussion reveals a dilemma between the individual's right to delete personal data and the obligation to store long-term information.

In the article, Henttonen emphasized that archives management is primarily concerned with privacy issues, as the activities involved aim to transfer information across different contexts, locations, and times (Henttonen, 2017). RtbF poses a challenge for archives, as it complicates the transfer of information, where decisions to delete data are not made by archivists and are not based on an objective evaluation of the archives informational value. Therefore, understanding privacy regulations becomes essential. Consultants should play a vital role in helping clients implement and harmonize these regulations without compromising the principles of good information governance.

3.2. RtbF Dynamics in Archives Management

Archives serve not only as documentation of individual or organizational activities but also hold long-term value. The application of the RtbF to archives activities presents new challenges, particularly in balancing individual rights. This creates a distinction within archives management. Archivists have the responsibility to maintain information to meet the needs of administrative governance, as well as for preservation, conservation, historical research, and legal compliance (Hendrawan & Ulum, 2017). In this context, archives not only document past activities but also play a crucial role in preserving historical value through archives preservation efforts.

Henttonen argued that the principle of RtbF conflicts with the goal of long-term preservation. While RtbF has significant support in Europe, its implementation is often met with opposition from archivists and other information professionals who are tasked with providing access to information. Critics argue that this principle can limit or even eliminate access to available information (Henttonen, 2017; Vavra, 2018). One informant echoed this sentiment, stating that if RtbF is implemented from the outset, it could diminish the future value of archives.

“If the Right to be Forgotten (RtbF) had been implemented from the beginning, organizations would no longer be able to use the data. As a result, the information would be inaccessible, despite the value of archives for future use” (Riko, Interview, January 10, 2025).

However, there are differing opinions among other informants who argue that RtbF does not significantly impact archives management. According to their experiences, many data subjects are not yet aware of their rights, allowing organizations to utilize their personal data according to their needs. This highlights a lack of public awareness regarding the importance of personal data privacy and their rights, including RtbF (Mahuli, 2023).

“RtbF does not threaten preservation since most data subjects are unaware of RtbF. From experience, due to this lack of awareness, organizations can store their data indefinitely without facing any issues” (Ima, Interview, January 10, 2025).

The relevance of RtbF in the context of archives becomes more complex when considering institutional policies and regulations governing archives management. This introduces dynamics in the implementation of RtbF within archives management, as the essence of RtbF as an individual right is closely tied to concepts such as dignity, reputation, privacy, and the protection of a person’s moral and legal integrity. However, this concept remains ambiguous since it encompasses various aspects that can overlap and cause confusion. A similar viewpoint was expressed, stating that in many cases, information is not completely removed from its original source but is only partially obscured concerning the data subject in question (Allegri, 2022; IFLA, 2016). Nevertheless, under certain conditions, the information can be entirely erased.

“The RtbF concept currently conflicts with archives management because existing regulations and understandings suggest that companies must have a data deletion procedure from a compliance perspective. However, complete deletion of data is not technically feasible at the moment, as RtbF ideally requires organizations to remove information entirely. Currently, the best option available is to anonymize the data rather than delete it completely. Until clearer regulations are established, soft deletion serves as a temporary solution that allows data to be managed without being irrevocably lost” (Riko, Interview, January 10, 2025).

“In industry practices, implementing RtbF alongside archives processes is challenging. Based on my experience, businesses often struggle to fully apply these rights without compromising their archives needs. However, solutions like anonymization and tokenization can help organizations meet data retention criteria and maintain archives while respecting individuals' rights to delete their personal information” (Arum, Interview, January 10, 2025).

To address the requirements of both policies, data privacy consultants offer temporary solutions until clearer regulations are established for clients. One such approach is soft deletion, which involves deleting data without complete removal. Anonymization can be temporarily used on archives containing sensitive personal information that lacks long-term importance, ensuring that the information cannot be used to identify individuals. As a result, data anonymization has become an effective and commonly used technique for preventing personal data breaches (Henttonen, 2017).

Anonymization can affect the value of archives, as it may lead to the exclusion of information that holds significant, yet limited, value, thereby threatening the integrity of the archives itself (Henttonen, 2017). According to the SNI ISO 15489-2016 of 2018 from the

Indonesian National Standard, archives possess several characteristics, one of which is integrity. This integrity refers to the completeness and confidentiality of the archives, which must be safeguarded against unauthorized changes. Therefore, it is crucial to maintain the authenticity and accuracy of the information contained within (Pratiwi, 2022).

Furthermore, there is a perspective suggesting that the RtbF principle can coexist effectively with archives principles, provided certain terms and conditions are met. One key consideration is obtaining consent from the data subjects. In this context, data subjects need to be aware that their personal data is being stored by the organization for a predetermined retention period. This aligns with the argument made by Fachmi and Inamullah that harmonizing the RtbF and archives management is essential so that both processes can function simultaneously without conflict, thus minimizing legal risks and policy violations (Fachmi & Inamullah, 2024). Consequently, user consent is vital in the policies developed by organizations and must be communicated to the data subjects, ensuring that both parties understand their respective rights and obligations.

“I believe that RtbF and archives principles can work together effectively. A person’s rights to their personal data, which is archived by a company, are based on the consent given by the data subject. When the data subject consents to the storage of their personal data, the company is then allowed to use that data in accordance with the consent provided. This approach aligns with the RtbF principle, as long as the company offers clear information to the data subject and the consent is given consciously” (Ima, Interview, January 10, 2025).

3.3. The Challenge of Implementing RtbF in Archives Management

The informants reported that during consultations with clients, they encountered numerous challenges, including regulatory, technical, and policy-related issues. Conceptually, the Right to be Forgotten (RtbF) often clashes with core archives principles, which emphasize authenticity, reliability, integrity, and long-term usability (Badan Standarisasi Nasional, 2018). Additionally, there is currently a lack of regulatory harmonization among policies, and no corresponding government or presidential regulations have been established for the PDP Law. This absence of clear regulations creates confusion for both organizations and data privacy consultants who assist organizations in complying with existing laws. Record retention activities are essential for data control and processing, as mandated by regulations; however, there are no guidelines for determining appropriate retention periods (Xie, 2016).

“In terms of regulations, there is a clash between the Personal Data Protection (PDP) Law and the Archives Law, with the PDP Law remaining unclear. If the PDP Law could provide clearer recommendations to the Archives Law, it would become easier for industry players to implement it” (Riko, Interview, January 10, 2025)

“Regarding retention, which is not clearly regulated in the law, the practices that are applied tend to rely on existing best practices based on experience rather than directly from legal provisions. The current regulations do not offer specific technical guidelines for deletion procedures or data storage mechanisms” (Ima, Interview, January 10, 2025)

“Data subject rights, including the right to be forgotten (RtbF) and other rights, are not yet clearly defined in the regulation. This ambiguity makes it challenging for us to provide concrete feedback, as there is no clear guidance on implementation. If we rely solely on the regulatory text without drawing on experiences or additional directions, it becomes difficult to know how these provisions will be implemented in practice” (Arum, Interview, January 10, 2025)

Regulation has become a major concern among informants due to the lack of clear examples for implementation. This ambiguity has resulted in many aspects being inadequately detailed, leaving consultants to rely on their own interpretations, which can vary significantly. Consequently, this inconsistency affects their ability to provide uniform feedback to their colleagues. The issue also directly impacts archivists, who deal with privacy matters in their daily tasks. However, few have established policies regulating privacy. As a result, decisions regarding personal data protection are often made independently (Dressler & Kearns, 2023).

“I hope that the Personal Data Protection (PDP) Law can provide more detailed classifications of data and establish specific retention periods for deletion according to each industry. Additionally, the Archives Law needs revision. If the PDP Law regulates data retention, then the Archives Law should be aligned and adjusted to reflect the policies set forth in the PDP Law” (Riko, Interview, January 10, 2025).

Organizations are often hesitant to delete personal data because it holds economic value and is important for their development. For example, archives serve as a driver of operational activities and are considered strategic information assets (Badan Standarisasi Nasional, 2018). This aligns that all collected data is economically valuable. There are also technical challenges associated with multiple archives, as the concept allows archives to exist in different locations simultaneously, particularly with electronic records (Fachmi & Mayesti, 2022). This complexity increases due to the distribution of electronic archives across various platforms and storage systems, making tracking more difficult. Although the concept and purpose of electronic and conventional archives are similar, their management differs significantly.

“The biggest challenge from a business perspective is the reluctance to delete data because it is needed for future improvement, learning, and marketing purposes. This makes the implementation of RtbF difficult” (Riko, Interview, January 10, 2025).

“The large amounts of stored data pose a challenge in itself, as clients almost never delete data and have never fully complied with RtbF. In addition to adherence to retention policies, there are concerns that even after the deletion deadline, the data may still be connected to other systems. When discussing electronic archives, the situation becomes even more complicated; data is dispersed across various locations, making it difficult to track” (Ima, Interview, January 10, 2025).

Lastly, one of the challenges faced is the internal organization's understanding of the regulations related to the retention and RtbF in the context of archives. While data privacy consultants have provided assistance in ensuring compliance with regulations, it is essential for employees within the organization to be aware of these issues. This presents a unique

challenge. Black research highlights that archivists must consider how developments in personal data protection affect their work, particularly in archives assessment activities (Black, 2020). Therefore, it is crucial for archivists to have a solid understanding of personal data protection.

“Even though we often visit or assist companies, we still do not know the intricacies of their daily operational processes, especially regarding technical aspects. This can affect whether the implementation of these regulations is effectively accommodated and complied with” (Arum, Interview, January 10, 2025).

“We understand that there is still a lack of understanding among clients regarding personal data protection and its implications for archives” (Riko, Interview, January 10, 2025).

The legal framework for data protection acknowledges the importance of archives; however, it does not adequately address archives management. This is evident in the ambiguity of existing regulations, even though it is not explicitly stated (Xie, 2016). As a result, organizations with archives management should seek assistance from data privacy consultants to navigate these issues effectively. Personal data protection regulations impact both organizations and the archivist profession, making it crucial to respond properly to the advice of data privacy consultants. Consequently, efficient and effective archives management should help organizations tackle this complex situation by creating and maintaining archives that support regulatory compliance while also balancing competing rights (Xie, 2016).

4. CONCLUSION

RtbF is a regulation related to personal data protection at both national and international levels. This allows individuals, referred to as data subjects, to request that their personal data stored and managed by an organization be deleted or destroyed. However, in archival practice, data protection activities pose unique challenges related to the RtbF principle. This is largely due to the conflict with the need for long-term preservation and the restrictions on access to information in archives. Archives activities are crucial concerning privacy issues since they involve transferring information from one context, place, or time to another.

Organizations are required to comply with existing regulations, which makes it essential for them to seek data privacy consultant services. These consultants help organizations understand and meet regulatory requirements. However, this poses a challenge, as informants have reported that many organizations lack competent human resources with the necessary skills to comprehend and adhere to these regulations. Therefore, data privacy consultants must offer clear guidance to assist organizations in fulfilling regulatory requirements and implementing effective governance practices.

The implementation of data protection, particularly the application of the Right to be Forgotten (RtbF) in archives management, faces significant challenges. A major issue highlighted is the ambiguity of existing regulations, especially in balancing an individual’s right to have their information deleted and the requirements of archives management. Data protection regulations acknowledge the importance of archives but lack explicit guidance on how archives should be managed in the context of RtbF. The Personal Data Protection (PDP)

regulation mentions retention activities that govern the storage period of personal data; however, it also recognizes RtbF as a fundamental right that organizations and individuals must uphold. Similar challenges arise within the Archives Law, particularly during the appraisal of archives and the preparation of archive retention schedules, where RtbF is applied. The primary difficulty for archivists is that deletion requests are often made by individuals rather than based on archives assessments and principles. When archives are deleted based on requests from data subjects, it creates a conflict with the obligations of archives institutions to adhere to established retention schedules and maintain the integrity and accountability of the archives.

The concept of "forgetting" in archives has become one of the most controversial aspects of the RtbF. This research identifies several challenges, including regulatory issues, a lack of understanding among human resources, business needs, and technical concerns. To address these challenges, various efforts have been made by data privacy consultants. One approach is to provide temporary solutions that balance the implementation of RtbF with archives management. For example, temporary pseudo-anonymization can be applied to archives containing personal data, along with soft deletion methods that align with regulatory requirements. However, it is important to recognize that anonymization can impact the integrity of the archives, a fact that should be acknowledged by data privacy consultants and archivists.

To avoid conflicts in policy fulfillment, harmonization between regulations is essential. This may involve revising existing regulations or issuing more comprehensive derivative regulations. Additionally, cooperation among institutions is crucial to ensure that organizations can effectively implement both sets of regulations. Archivists should prioritize obtaining user consent in all archive policies related to data retention and deletion. With the data subject's consent, the principles of the RtbF and archives management can work in harmony.

Based on the explanations above, it is advisable for data privacy consultants to not only be well-versed in personal data protection regulations but also to have a strong understanding of archives principles. This knowledge is essential for providing balanced recommendations to organizations. A deep understanding of these concepts will enable data privacy consultants to assist organizations effectively in addressing one of the key data rights, specifically the RtbF. Furthermore, archivists must stay updated on new regulations, such as personal data protection (PDP) laws, to align archives activities with privacy provisions. The government plays a significant role in this context, as it is responsible for establishing regulations and providing specific guidelines on implementing RtbF and managing archive storage within organizations. On the organizational side, it is crucial to develop internal systems and policies that comply with both sets of regulations. Raising awareness and educating individuals about their rights in data protection is also necessary, as this will empower them to better understand and assert their rights over their personal data.

RtbF has been implemented in several European countries, each facing its unique challenges. Therefore, research and learning about this topic are vital for Indonesia to effectively adapt and learn from the experiences of other countries. This research is just a small initial step towards understanding the complexities of fulfilling personal data protection, known as RtbF, in the context of archives. Many areas have yet to be explored, and we hope this study will inspire further investigation. Additionally, we aim to contribute to the advancement of archive science and the development of more inclusive policies in Indonesia. We recognize that science is always evolving; therefore, we encourage further

research on this topic in collaboration with various stakeholders to deepen and enrich our understanding of this important issue.

5. AUTHORS' NOTE

The authors declare that there is no conflict of interest regarding the publication of this article. Authors confirmed that the paper was free of plagiarism.

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