

**BALANCING ARTICLE 21 AND ARTICLE 19(1)(A): THE RIGHT TO BE FORGOTTEN AND
FREEDOM OF PRESS IN INDIA**

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Abstract

In the world of internet any information once uploaded on the internet remains accessible indefinitely and creates a digital footprint permanently. While this permanence strengthens transparency and access to information, it also raises serious concerns related to person's privacy, dignity, and personal autonomy. In response The Right to Be Forgotten has emerged which allow individuals to ask the court to remove or de-link any outdated, irrelevant, or harmful personal information from public access. Internationally, the right gained recognition through the 2014 decision of the Court of Justice of the European Union in Google Spain v. AEPD and was later codified under Article 17 of the General Data Protection Regulation (GDPR).

Although, In India the Right to Be Forgotten is not expressly mentioned in our constitution but derived from Article 21, which undermines the Right to Life and Personal Liberty, including the Right to Privacy. The Digital Personal Data Protection Act, 2023 further strengthens the statutory framework by providing mechanisms for correction and erasure of personal data.

However, the recognition of Right to Be Forgotten creates a constitutional tension with Article 19(1)(a), which provides the citizens and media the freedom of speech and expression, including freedom of the press. A free press plays a vital role in ensuring transparency, accountability, and the public's right to know. Excessive use of Right to Be Forgotten may risk restricting legitimate journalism and democratic discourse.

This article examines the evolving legal and constitutional framework of the Right to Be Forgotten in India, its international development, its conflict with press freedom, and the need for a balanced, case-by-case approach. It argues that a carefully structured legal framework is essential to protect individual dignity while preserving democratic transparency and freedom of expression.

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INTRODUCTION

We live in a world, where internet never forgets. In today's interconnected world, if any information once uploaded on the internet, it becomes virtually permanent, searchable and accessible across jurisdiction within a single click, a single post, an old news, a past mistake or even an allegation once uploaded or published online can remain accessible forever. This creates a fear among the persons that just one search and any information about any individual can be retrieved instantly, regardless of how much time has passed. The digital permanence has made access to information easier and strengthen transparency in society, but also created new challenge for personal dignity and privacy and personal autonomy. In earlier times, memories faded and it was difficult to access and keep records for a longer period. However, today search engines, online platform, social media preserves information indefinitely. For some individuals, especially those once involved in criminal cases controversies, this constant visibility can become a burden even if the person has been acquitted but the digital footprint remains, which mentally affects the person and raises important question that should a person still be defined by their past?

The concept of the Right to be forgotten emerged as a response to these concerns. It empowers the person to request the removal or de-linking of personal information that is outdated, irrelevant, misleading or harmful. The Right gained international prominence following the 2014 's decision of the court of Justice of European Union in case of Google Spain vs. AEPD², which recognized an individual's right to request search engines to remove certain personal data from search results.

² *Google Spain SL v Agencia Española de Protección de Datos (AEPD) and Mario Costeja González (C-131/12)* [2014] ECLI:EU:C:2014:317 (Court of Justice of the European Union)

However, it brings it into conflict with freedom of press, a cornerstone of democratic governance protected under the article 19(1)(a)³ of Indian constitution. Allowing individuals to erase or restrict access to information, may risk interfering with general freedom and public's Right to know.

This article attempts to explore the delicate balance between Right to be forgotten and Freedom of press because protecting Once, privacy and dignity is important as well as the democratic transparency and public's right to know.⁴

Concept and Origin of Right to be forgotten

The right to be forgotten is one of the most compelling Legal evolution of digital age. It represents the tension that exists between the permanence of human stuff on the internet and the need of humans for redemption and privacy. The person's past should not indefinitely haunt their digital present.

The “Right to be forgotten” is the right to request to remove or erase the content from the internet or sites, so that it's not accessible to the public at large. It empowers individual to have information in any form like news, videos, photos deleted from the internet and not found in search engines.

Where did it came from?

This idea was first originated in Europe even before the internet. It evolved from a French concept called 'le droit à l'oubli' which means the Right of oblivion. Originally, it was meant to help people who had finished a prison sentence. The law felt that once you paid your debt to the society, you deserve a clean slate, so you could find job easily and led a normal life. When the internet came along, lawmakers realized , we needed same “clean slate” for digital lives

The modern version of this Law became famous in 2014, European Court of Justice, ruling in a case where it was codified for the first time following a Spanish man's quest to make the world forget a 1998 advertisement.⁵

³Constitution of India 1950, art 19(1)(a).

⁴ *Romesh Thappar v State of Madras* AIR 1950 SC 124; *Indian Express Newspapers (Bombay) Pvt Ltd v Union of India* (1985) 1 SCC 641

⁵ *Google Spain SL v Agencia Española de Protección de Datos (AEPD) and Mario Costeja González* (C-131/12) [2014] ECLI:EU:C:2014:317.

Law in India

There is no Such formal provision in the existing Indian data protection law, Information Technology act, 2000 provisions grants an individual, the Right to be forgotten, ⁶being part of the Right to privacy which is governed under a personal data protection bill which has yet to pass.

The Right to Privacy a fundamental right was declared by Supreme Court in landmark judgement of the case Justice K.S. Puttaswamy vs. Union of India, 2017 ⁷ Hence the Right to privacy is protected under article 21, the Right to Life and Personal liberty defined in our constitution.

International Development: GDPR and Article 17

General data protection regulation is a data protection law of the European Union, which came into force in 2018. ⁸It was formed to protect the personal data & privacy of individuals in the European countries. It not only apply to European Union companies, but also to any company in the world that handles data of European Union citizens. The Right to be forgotten is officially recognized in article 17 of GDPR General data protection regulation. Under this provision, a person can ask a company or any organization to delete their personal data, which is also called 'Right to Erasure'.

A person can request deletion of the data when it is no longer necessary for the purpose it was collected, when the person takes back it's consent, when the data was collected unlawfully, when there is no strong legal reason to continue or data is related to a child and was collected through online services.

Exceptions can be :

The right is not absolute, so data may not be deleted if , It is required for the freedom of expression and press, if it is needed for any legal obligations or is necessary for public interest or security of the nation, or are required during any court proceedings, or legal claims. This highlights that GDPR tries to balance privacy rights, and freedom of expression

⁶ Information Technology Act 2000 (India).

⁷ *Justice K.S. Puttaswamy (Retd.) v Union of India* (2017) 10 SCC 1.

⁸ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation).

EUROPEAN UNION STRONGLY RECOGNIZES THE RIGHT TO BE FORGOTTEN

The European Union considers that a person's privacy is utmost important and should be protected as a fundamental right of a human being. This Right to be forgotten is legally enforceable and if any organization fails to comply with that, then they can face heavy fines. Peoples have the right to file complain to the data protection authorities. And the European court have been actively supporting this right because we all are aware that internet is the most harmful thing at the present times.

Importance in international law: The General data protection regulations has influenced many countries to strengthen their data protection laws by highlighting it's need in today's era. It has become a global standard for privacy protection and set an example of how privacy and press freedom can be balanced in this digital age

Right to be forgotten in India:

Background: The need for Right to be forgotten, was emerged due to rapid digitization and widespread internet usage, which creates a fear or distrust on the internet. Also violation of once Right to privacy in today's digital world, the information once uploaded online can accessible permanently with the vast variety of search engines and social media platforms storing large amount of personal data of an individual, who often lose their control over their own information, which creates a mental distress among the people.

Meaning: The Right to be forgotten is the right of an individual to request removal or erasure of personal data from public access. It applies when the data is outdated, irrelevant, misleading or a lawfully processed. It is no longer necessary for the purpose it was collected, it empowered people to protect and control their digital identity. However, it is not an absolute right and must be balanced with public interest and freedom of expression.

Legislative position in India: It was not initially have a specific law to recognize Right to be forgotten. The concept discussed in earlier data protection proposals, Now addressed under digital personal data protection act, 2023.⁹ This act gives an individual the right to make correction in

⁹ Digital Personal Data Protection Act 2023 (India).

personal data as well as erasure of personal data to address the grievances or any problem related to personal data. The data protection board was established.

Importance of right to be forgotten: In this generation of posting everything online and open use of social media, where people upload each or every detail of their lives online, But somehow they hamper their own privacy which we realize later. To protect one's dignity and reputation, Right to be forgotten was needed to prevent continuous social stigma due to past events. It also helps to move forward and led a normal life without any digital punishment. Also necessary for the protection of victims of crime from repeated online exposure. It provides strength to data privacy provision and encourages accountability among digital platforms, Right to be forgotten promotes safer, and more responsible use of personal data.

Challenges in implementation: To make real changes, the law or the rules need to be implemented and followed strictly, but it likes clear procedural mechanism for enforcement. It also face challenges like conflict with Right to freedom of speech and press. It's also difficult to completely remove any data from the internet because Once media photo or video is uploaded. It becomes accessible to all and thousands of copies are already formulated, but balancing transparency and privacy concern are hard to do together. The cross border data storage and jurisdictional issues, also creates challenges in implementation.

LEGAL AND CONSTITUTIONAL FRAMEWORK RIGHT TO BE FORGOTTEN IN INDIA:

1. Constitutional foundation,

(a) Article 21 right to life in Personal liberty: The Right to be forgotten is rooted in art 21 of the Constitution of India. The landmark of Justice K.S. Puttaswamy vs. Union of India.¹⁰ The Supreme Court declared that the Right to privacy is a fundamental right, which is protected under the article 21 of the Constitution. The court recognize that informational privacy, personal autonomy and protection of individual dignity forms part of a person's identity, the Right to control it's disclosure including restricting continued publication which flows naturally from art 21. Thus, the Right to be forgotten is considered a part of Right to privacy.

¹⁰ *Justice K.S. Puttaswamy (Retd.) v Union of India* (2017) 10 SCC 1.

(b) Article 19(1)(a) Freedom of speech and expression: The Right to be forgotten, must be balanced with freedom of speech and expression, freedom of press, and the public's right to know. The courts must have decide whether the information serves public interest and it should not unnecessarily harms an individual's privacy. This balancing approach was seen in case of Jorawar Singh Mundy vs. Union of India, where are the court directed the removal of a judgement from online platform to protect the petitioners reputation after the acquittal. ¹¹

(c) Article 14 right to equality: It ensures that everyone should be treated equally in the eyes of the law. ¹²It also laid down proper data protection laws, without these individuals may suffer arbitrary digital exposure. Article 14, recognizing the right to be forgotten, ensuring fear treatment of every individual and equal protection from any kind of misuse of their personal data in this digital age. This provide protection from the indefinite harm to the reputation of any individual and every person should have the right to preserve the reputation by removing or de-linking any such data, which ham his personal life or dignity.

2. Emergence of the right to before, forgotten in India: The concept developed through digital judicial decisions.

a. Dharmaraj Bhanushankar Dave vs. State of Gujarat : This case is considered one of the earliest discussions on the Right to be forgotten in India. In this case, the petitioner requested to remove a non-reportable judgement by the Gujarat High Court from the internet. He argued that online availability of the judgement harm his reputation, even though the court did not granted him a relief, but this case open the discussion about the privacy, reputation of an individual and online data in Indian legal system. ¹³

b. Jorawar Singh Mundy vs Union of India (2021): This case marked significant step forward. In this case, the petitioner was acquitted of criminal charges. However, copies of the judgement was still available on various legal websites. Even though he was found not guilty, the continued presence of the case was damaging and affecting his reputation and career opportunities. The Delhi High Court directed certain websites to remove and block access to judgement. This case is important because it gave practical recognition to the right to be forgotten. This showed that the

¹¹ Jorawar Singh Mundy v Union of India 2021 SCC OnLine Del 2306.

¹² Constitution of India 1950, art 14.

¹³ Dharmaraj Bhanushankar Dave v State of Gujarat Special Civil Application No 1854 of 2015 (Guj HC, 2017).

courts are there to balance the right to privacy along with protecting public's right to access information.

c. Ashutosh Kaushik Union of India (2021): This case highlights how individuals including public figures can seek protection from permanent digital exposure of past mistakes. This reflects the growing need of data protection and information, privacy in digital world.¹⁴

STATUTORY FRAMEWORK IN INDIA:

1. Information Technology act, 2000: The section 42A of this act provides the provision of getting compensation or damages when the companies fail to protect someone's sensitive personal data. However, this act does not explicitly mention the right to be forgotten, but they provide grievance mechanism for removal of unlawful or non-consensual content. Thus, the protection exist indirectly not explicitly.

2. Personal data protection bill, 2019: This was introduced by Ravi Shankar Prasad on 11 December 2019, in which the chapter V lay downs the provisions of rights of the data principal the clause 20 specifically recognize the Right to be forgotten, which allows a data principle to restrict or prevent continue disclosure of personal data, although the bill was not passed in it's original form, but it marked a major legislative step.

3. Digital Personal data protection act, 2023: In India, this provide the right of data principal which protects One's right to erase, or delete or any kind of personal data from the internet or any website also lay down the duties of the data fiduciary and provision for redressal mechanism that will work in favour of protection of individuals privacy. The phase Right to be forgotten is not directly used, but it provide a statutory basis for requesting seeking deletion or erasure a personal data or content. Currently, Right to be forgotten is not explicitly declared as a separated fundamental right, but it is treated as a part of article 21 of the Constitution at the right to privacy. Court gave judgement on the case to case basis and the digital personal data protection act 2023 strengthen and gave statutory protection.

¹⁴ Ashutosh Kaushik v Union of India 2021 SCC OnLine Del 3934.

Freedom of Press

Press is called the fourth pillar of Indian democracy, the freedom of speech and expression is the most crucial fundamental right to the citizens of India. The freedom of Press refers to the minimal interference of the state in the operation of press or any form of communication media, including newspaper reports, news channel, YouTube, OTT platform, etc, or any other E media.

The freedom of press India derives from article 19(1)(a) of the Constitution, which provides the fundamental Right of freedom of speech and expression. This article gives liberty to every citizen to express themselves through speech, writing, printing, painting, etc. However, it also provides the state to impose reasonable restriction on this freedom.¹⁵

Why freedom of press: In case of Indian newspaper vs Union of India, The sole objective of the press is to supplement the public interest by printing the facts, opinion to keep the citizens of the nation informed. Freedom of press is the crux of social media and political intercourse. Press works as a medium of availing knowledge and spreads the vital information of day-to-day events, development, or incidents which are related to the national interest. Thus, To form a civil society which is capable of critical and independent thinking and not afraid to form it's opinion about the country or the government, We need fair and free operation of the press.

Article 19 (1)(a) of the Indian constitution provides all the citizens the right to freedom of speech and expression, although the "Freedom of press" is not expressly mentioned in Constitution, but the Supreme Court held that freedom of press is implicitly included with article 19(1)(a).¹⁶

BASED ON JUDICIAL INTERPRETATION, FOLLOWING RIGHTS FORM PART OF PRESS FREEDOM UNDER ARTICLE 19 (1)(A)

1. Right to Publish : The press has the freedom to publish any news opinion, information related to any subject of the national interest or security without prior censorship by the state. This also includes editorial independence and freedom to determine content.¹⁷

¹⁵ Constitution of India, art. 19(1)(a) & 19(2).

¹⁶ *Romesh Thappar v. State of Madras*, AIR 1950 SC 124..

¹⁷ *Brij Bhushan v. State of Delhi*, AIR 1950 SC 129.

2. Right to Circulate: The freedom of speech includes the freedom of circulation. It means that the media or the press has the right to distribute or print newspapers, reports, magazines, and other publication without unreasonable government restrictions or interference.

3. Right to receive information: The freedom of press provides the right to receive or collect information about any related matters. This right enable the press together news and hold the government accountable. The Right to Information act, 2005. Also grants the press the right to access public records. ¹⁸The receiving, collecting and studying the data about the issue or related to any subject, which will be helpful to the press in presenting real data and more authentic news where people can rely more.

4. Right To conduct interviews: The press has the right to gather information, as well as conducting interviews, To let the people know the actual views of the persons. However, This right is subject to consent and reasonable restrictions, particularly in sensitive cases, involving prisoner or under trials, victims, etc.¹⁹

5. Right to report court proceedings: The press has the Right to attend witness and report proceedings, which ensure transparency in our judicial system. However, The court may apply some restrictions in some specific cases.²⁰

JUDICIAL APPROACHES

1. Romesh Thapar vs The state of Madras: This was one of the earliest, an important case related to the freedom of Press in this case, the state of Madras impose a ban on circulation of a political journal on the basis of public safety later, the Supreme Court struck down the ban and held that the state was infringing the right to freedom of circulation of press media. The court also clarified that restrictions can only be imposed within the limits of article 19(2). This case established that Press freedom is a fundamental part of freedom of speech and expression.

2. Brij Bhusan vs State of Delhi: In this case, the government imposed pre-censorship on a newspaper under the east Punjab public safety act. The Supreme Court held that pre-censorship before publication violates the freedom of press under article 19(1)(a). The court laid down the

¹⁸ Right to Information Act, 2005.

¹⁹ *State of Maharashtra v. Rajendra Jawanmal Gandhi*, (1997) 8 SCC 386.

²⁰ *Naresh Shridhar Mirajkar v. State of Maharashtra*, AIR 1967 SC 1.

judgement that freedom of speech includes the right to publish without prior government approval. This provides protection from arbitrary state control.

3. Sakal Papers vs Union of India: The government introduced a law to regulate the number of pages, a newspaper can published on the basis of its price. The aim was to prevent monopolies. The Supreme Court struck down the law because such regulation can directly affect the circulation and its content which violate article 19(1)(a). The court held that state cannot indirectly curtail press freedom under the guise of economic regulation. This case expanded the interpretation of article 19(1)(a) by protecting the newspapers from indirect restrictions which effects the circulation or content.²¹

4. Indian Express Newspaper vs Union of India: This case was related to the imposition of custom duty on the imported newsprints. The court laid down the judgement that although taxation laws are generally valid. In case of tax burdens the press excessively and restricts the circulation may violate their right of freedom. The court held that press plays a vital role in democracy and should be protected from unreasonable financial burden, and not disproportionately affect press freedom.²²

REASONABLE RESTRICTIONS OF PRESS FREEDOM AND THEIR RELEVANCE TO THE RIGHT TO BE FORGOTTEN:

The article 19(1)(a) deals with Right of the freedom of the press and is subject to some restrictions under 19(2), which were relevant when balancing it with right to be forgotten derived from article 21 Right to privacy.

1. Sovereignty and integrity of India: The reasonable restriction was imposed on the right of the freedom of press in case, if the speech is threatening national unity, or promotes any kind of secession. The press cannot publish any content that undermines the sovereignty or integrity of the nation. This was added by the 16th Constitutional amendment in the year 1963. The right to be forgotten may be involved to seek any removal of outdated or incorrect allegation that harms an individuals standing unless public interest outweighs the privacy.

²¹ Sakal Papers (P) Ltd. v. Union of India, AIR 1962 SC 305.

²² Indian Express Newspapers (Bombay) Pvt. Ltd. v. Union of India, (1985) 1 SCC 641.

2. The security of the state: The freedom of expression cannot be exercised in any way that it becomes a threat to the security of the state in any manner, any kind of communication, which insist the people to cause any social arrest, rebels, violence, riots, etc against the state and its subject would be concerned under this restrictions. The reports by the media which are related to criminal accusations remains permanently accessible online. Even if the person later acquitted. The continued easy access to such report may prejudice reputation, Here the Right to be forgotten seeks limited removal or delinking the information which is no longer relevant.

3. Public order: This term was inserted by the first amendment in 1951 after the case of Romesh Thappar vs State of Madras, the Supreme Court held the freedom of press is restricted to any kind of speech which leads to public disorder, which includes prevention of rights, disturbance, and public unrest. Here the right to be forgotten can be use to remove such kind of speech and prevent perpetual punishment through internet and protection from digital mob justice.

4. Decency or Morality: For preserving the decency or morality in the country. The state has the authority to limit the freedom of speech and expression. This also covers section 292-294 IPC- which are related to obscenity laws.

This highlights the Right to be forgotten, where people can ask the court to struck down any publication related to any intimate images, or in case of revenge porn cases, sexual offence acquittals or cases involving juveniles, to protect their personal dignity under Art-21

Conflicts between Right to be Forgotten and Freedom of Press —

1. Public's Right to know vs Individual's Right to privacy

The freedom of press ensures transparency among the people of the nation and keep the citizen informed about the matters of public concern. Meanwhile the Right to be forgotten protects persons personal privacy and dignity under article-21, but the conflict arises when removing information limits the public access to facts.

2. Permanence of Digital Archies vs Right to move on

Now the Data which is stored on the internet or once the news archives it act like society's memory in the Digital era. These achieves are no longer stored in dusty libraries rather in computers, online

sites. Once published, they are instantly searchable and permanently accessible. The right to be forgotten challenges this permanence. It argued that individual should not be endlessly defined by outdated or irrelevant information about their past which is available online. The tension lies here, Should the truthful information remain permanently searchable, even if it prevent a person from rebuilding his life again. The Right to be forgotten does not aim to erase history, but it ensure that someone's past should not affect their present.

3. Truthful information vs Relevance over time

The traditional laws related to defamation deal with false statement or defamatory comments. If something reported is true, it gets protected under press freedom. But Right to be forgotten introduced a new dimension which argued that even true information may become irrelevant & unfair if it is no longer serves any public interest & harm one's present life.

4. Willing effect on journalism

The Journalism & Right to freedom of expression & speech is concerned about the potential of Right to be forgotten to discourage investigative journalism. Because If journalists fear that their work may later be removed or challenged. They may hesitate to report on controversial issues. This could weaken the democratic accountability by limiting the role of media.

However, Right to be forgotten is not intended to suppress any legitimate reporting. It only aims to prevent any harm cost by indefinite digital accessibility.

WAY FORWARD: BALANCING THE RIGHT TO BE FORGOTTEN AND FREEDOM OF PRESS

The conflict between the right to be forgotten and freedom of press cannot be resolved by prioritising one right over the other. Because both of these Right are relevant in their own way. One protect our citizens privacy and other provides freedom to expression & speech to our media, to make the citizen of the nation aware about the ongoing issues and matters of national interest instead, a balanced framework is needed to protect individuals dignity while preserving democratic transparency.

1. Adopt a case – by – case Balancing approach: Courts should continue to evaluate the Right to be forgotten claims individually, rather than applying blanket rules. The decision should be made

on the circumstances of the case while making sure the public interest in the formation, the nature and seriousness of the offence. The approach should ensure fairness and prevent misuse.

2. Promote delinking instead of deletion : This can be a practical solution, because deletion of any information from the web completely is near to impossible but delinking of information from the search engine can help. This means that original news will remain part of historical archives, but it does not appear easily just by Name based searches.

3. Clear legislative framework and prevent misuse by powerful individuals: India needs a clear, framework to guide the principle of right to be forgotten. A comprehensive data protection law should be defined or formulated and clear laws will help to reduce confusion and ensure both privacy and freedom of press to expression & speech.

Safeguards must be introduced to prevent any kind of misuse that can be taken place by powerful individuals to erase the information about their wrongdoing under the guide of Right to be forgotten.

4. Strengthen Data protection and digital literacy: The public awareness about Privacy Rights & Digital literacy should be strengthened by awareness camps, and education, so that people can understand how online information can shape their future and can destroy too. They should be aware of the danger to their personal information privacy, if once uploaded online. An informed society can better balance transparency and privacy.

CONCLUSION

The major concern of balancing the Right to Be Forgotten and Freedom of Press in India is not just a legal debate but it is about protecting both individual dignity and democratic values of the citizens of the nation. The Article 21 gives every citizen the right to live with dignity, privacy, and respect. In today's digital era if any information once uploaded on the internet it often stays permanently accessible. Past mistakes, false allegations, or even cases where a person has been acquitted can continue to appear online and face problems related to jobs, relationships, and mental peace. In such situations, the Right to Be Forgotten becomes important to protect a person from lifelong harm.

Meanwhile, Article 19(1)(a) provides the freedom of speech and expression, which includes the freedom of the press. A free press is the backbone of democracy. It informs people, exposes wrongdoing, and ensures transparency. If this freedom is restricted too much in the name of privacy, it may weaken public trust and limit the public's right to know the truth.

Therefore, choosing one right over the other is not the solution because, we know that both rights are equally important and must be balanced carefully. The Constitution itself limits these rights by imposing reasonable restrictions under Article 19(2), which means press freedom is not absolute. At the same time, the Right to Be Forgotten cannot be used to hide facts or erase accountability which are in public interest.

The courts have started recognizing the need to protect privacy in certain cases, especially when the information is outdated, irrelevant, or harmful and have no public interest. However, there is still a need for clear laws that define when and how this right can be exercised. Such laws should ensure fairness and prevent misuse.

In conclusion, a strong democracy is built on balance. The Right to Be Forgotten should protect individuals from unnecessary harm related to their personal privacy, while Freedom of Press should continue to serve society by promoting truth and accountability. By maintaining this balance, India can uphold both human dignity and democratic freedom in the digital age.