

Public health or digital liberties?

Citizens' tracking during
and after COVID-19: implications
for Democracy in EaP countries

Report on the situation
in Armenia



Institute of
Innovative
Governance



B | S | T The Black Sea Trust
for Regional Cooperation
A PROJECT OF THE GERMAN MARSHALL FUND

Contents

Introduction	4
1. Armenia: background	5
2. Information Dissemination Restrictions	6
3. Data Protection issues and Privacy Concerns	7
4. The Introduction of Tracing Apps and Its Implications	8
5. Expert Interviews	10
6. Survey Findings	12
Conclusion	13

Introduction

2020 was marked by the dramatic spread of Covid-19 disease the fight against which took intensive and radical character although with little effect. Within the framework of this fight against the disease governments took a number of steps to prevent its further spread including lockdowns as well as tracing apps to control citizens' overall mobility.

In the case of Armenia, tracing apps were introduced alongside other measures in order to control the spread of the virus. However, these measures were not perceived straightforward by the public given lack of awareness both regarding the nature of the virus itself and therefore the actual use of these control measures.

Covid-19 crisis coming as a huge surprise leaving people unprepared and vulnerable towards the challenges in various spheres. Apart from affecting economies and altering the overall nature of the world order and international relations, it has raised questions of social justice, the relationship between the individuals and the society, the clash of public health with core individual liberties¹. Given little was known about the pandemic it gave rise to an unsurmountable number of (dis)information flows which challenged information security, democracy and so on.

In our strive to systematize approaches to Covid-19 two major lines can be identified: (1) libertarian and (2) authoritarian². The approaches worldwide represent a combination of libertarian and authoritarian. However, there have been countries which initially denied the idea of lockdown relying profoundly on the reason of their citizens confining themselves merely to an array of recommendations.

Public health interventions majorly took the following four forms: (1) testing, (1) tracing, (1) isolation and (1) support. And therefore it has claimed huge resources that were spent on various public institution, healthcare as well as preventative measurements let alone the restorative process. And therefore it requires preplanning talent, calculation, data usage and are very much dependent on democratic governance to be considered legitimate. Having said this, evidence demonstrate that no strong correlation has been found between efficacy and actual regime type³.

However, to what extent we can speak of anti-pandemic measurements threatening democratic order is hard to estimate as of now, although apparently limiting the right of free movement, making the masks compulsory in all occasions as well as tracing and tracking are seen as anti-democratic and human rights violations.

1. <https://www.coe.int/en/web/portal/covid-19-protecting-democracy>

2. Agamben, G. (2020a). The invention of an epidemic. *The European Journal of Psychoanalysis*. <https://www.journal-psychoanalysis.eu/coronavirus-and-philosophers/>. Accessed 26 May 2021; Sylvia Walby, The COVID pandemic and social theory: Social democracy and public health in the crisis, *European Journal of Social Theory*, 2021, Vol. 24(1) 22–43

3. <https://carnegieendowment.org/2020/03/31/do-authoritarian-or-democratic-countries-handle-pandemics-better-pub-81404>

Armenia: background

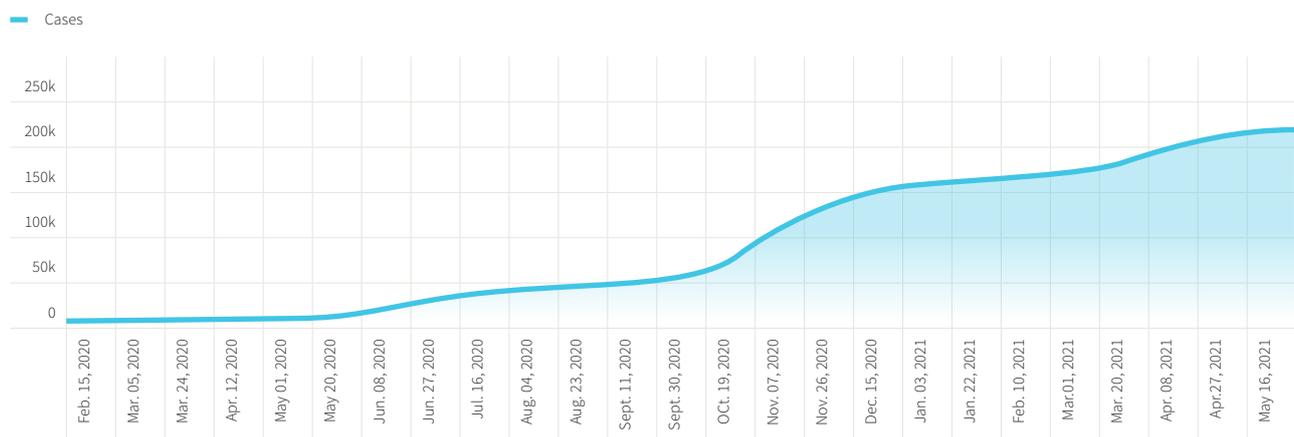
Despite its landlocked geography Armenia could not avoid severe expansion of Covid-19 infection. The first case in Armenia was registered on March 1⁴. Later, on March 11, total lockdown was declared followed by a Situation of Emergency⁵ that was extended until September 11⁶.

To ensure the implementation of anti-Covid measurements Commandant's office was established under the auspices of the government led by Deputy Prime Minister Avinyan⁷.

Measurements to prevent the spread of the disease were the same as elsewhere in the world including lockdown, wearing masks and medical gloves, self-isolation as well as distance learning and working upon possibility. Armenian government through the Commandant's office has adopted laws, law amendments as well as two tracing apps to prevent the spread of the disease.

However, the Situation of Emergency (SoE henceafter) was quite questionable in itself given that Article 120 of the Constitution adopted in 2015 and the Law on the Legal Regime of the State of Emergency of Armenia authorize the Government to declare a SoE in the event of an imminent danger posed to the constitutional order, including attempts to change or overthrow it by force, attempted seizure of power, armed riots, national, racial and religious conflicts, terrorist acts, seizure or blockade of special facilities, organization and activities of illegal armed groups⁸.

Figure 1.
Total Covid-19 cases in Armenia⁹



- COVID-19: Updates from Armenia, Mar 13 2020; <https://www.evnreport.com/raw-unfiltered/covid-19-updates-from-armenia>
- 'The Government of the Republic of Armenia Decision on Declaring a State of Emergency in the Republic of Armenia' Ministry of Justice of the Republic of Armenia, www.moj.am/storage/uploads/298voroshum_ENG_24032020.pdf
- RA Government decision N 1319, On the lengthening of SoE declared on March 2016 2020 and amendments to the Decision N 298 Adopted March 16, 2020; 12 August, 2020; <https://www.arlis.am/DocumentView.aspx?docid=145244>;
- RA Government Decision N 298 to declare SoE, 16 March, 2020, <https://www.e-gov.am/gov-decrees/item/33564/>
- More on this at <https://journals.sas.ac.uk/lawreview/article/view/5272/5108>
- Armenia, Coronavirus cases; <https://www.worldometers.info/coronavirus/country/armenia/>; accessed May 22, 2021

Despite Armenia's deadlock geography the virus managed to spread extensively making Armenia a high-risk country as well as having the highest ratio per capita regionally. As of August 22, 2021 236,742 total Coronavirus cases have been registered in Armenia, the date ratio being 2.1%(4386).

The intensive expansion of the infection in Armenia has several reasons such as belated measurements, not taking the virus seriously, as well as assemblies and meetings ahead

referendum on Constitution amendments¹⁰ scheduled for April 2020.

Due to the steady rise in infected citizens, the Government had to cancel the Referendum. Contrasting opinions and assessments of the virus itself gave rise to an unprecedented number of disinformation and panic on social media and media agencies¹¹ as well as a high degree of media manipulation.

Information Dissemination Restrictions

The Government's response to this situation was in the face of restrictive measurements on information dissemination.

This generated a huge wave of disappointment and complaints by media representatives. Indeed, this was a serious blow to the overall democratic establishment in the country leaving media representatives and freedom of speech advocates highly concerned about it. However, it is crucial to mention that after a number of consultation with a wide array of media agencies and representatives this decision was reconsidered by the Government in the aftermath of which restrictions were exacerbated¹².

Restrictions imposed on the dissemination of information and the right to free speech are seen as violations of fundamental human rights in general and a huge blow to democracy in particular. This was not left unnoticed by the institute of Ombudsman in Armenia which has been closely monitoring the situation unfolding around Covid-19 reiterating the right of free expression as an indispensable human right in its annual report¹³.

10. Resolving the Constitutional Court's Crisis of Legitimacy, Jun 25 2020; <https://www.evnreport.com/politics/resolving-the-constitutional-court-s-crisis-of-legitimacy/>

11. How to fight disinformation in the times of Pandemic, Cyber expert opinion; <https://www.365news.am/2020/04/30/%D5%B0%D5%A1%D5%B4%D5%A1%D5%BE%D5%A1%D6%80%D5%A1%D5%AF%D5%AB-%D5%AA%D5%A1%D5%B4%D5%A1%D5%B6%D5%A1%D5%AF-%D5%AB%D5%B6%D5%B9%D5%BA%D5%A5%D5%9E%D5%BD-%D5%BA%D5%A1%D5%B5%D6%84%D5%A1%D6%80%D5%A5%D5%AC/>

12. <https://khosq.am/2020/03/27/%d5%b0%d5%a1%d5%b5%d5%bf%d5%a1%d6%80%d5%a1%d6%80%d5%b8%d6%82%d5%a9%d5%b5%d5%b8%d6%82%d5%b6-54/>

13. Human Rights Defender 2020 Annual Report (in Armenian), pp. 662-663 <https://www.ombuds.am/images/files/883f55af65e3c33553139031c7ac0ce6.pdf>

Data Protection issues and Privacy Concerns

The Covid-19 situation in Armenia has generated an array of problems regarding data protection and privacy issues in Armenia.

On 31 March, the legislative package on Making Addenda to the Law on Legal Regime of the State of Emergency and on Making Addendum to the Law on Electronic Communication was adopted. It underlined that “the proposing solutions are aimed at making more effective the coronavirus disease prevention and isolation works”. He then went to underline that the location finding data on persons would give an opportunity to find the place of the persons who had contacted the virus bearer. The Deputy Prime Minister has assured that “the system is fully automated, there is no human intervention; there is a program which will find the circle of possible contact¹⁴”.

The amendment authorized the government to gather information available to mobile operators and consolidate them into a centralized database, including the location of users of mobile phones, the phone numbers of those they contacted including the start and end times of the

communication. The justification was the necessity of identifying the circle of contacts of those who test positive for COVID-19 so as to place them under quarantine ruling out the perspective of using this information for any kind of political purposes.

The Government clarified that the restrictions were conducted exclusively within the framework of SoE declared due to the pandemic. This means that the data is expected to be deleted once the SoE is lifted, and that the system is fully automated with no human intervention. However, the bill raised many concerns among the opposition, the Human Rights Defender's Office (HRDO)¹⁵, civil society and the public in general. One issue was the oversight of the body that was tasked to collect and destroy the information. Others questioned the logic of the measure since telecommunication doesn't necessarily indicate a physical meeting¹⁶.

14. National Assembly Convenes Extraordinary Sitting

http://www.parliament.am/news.php?cat_id=2&NewsID=12843&year=2020&month=03&day=31&lang=eng

15. Legal position of the Human Rights Defender on draft laws restricting the privacy of correspondence and other rights;

https://ombuds.am/en_us/site/ViewNews/1137

16. Observations About Armenia's COVID-19 Response, 06 July 2020,

<https://www.evnreport.com/covid-19/observations-about-armenia-s-covid-19-response>

The Introduction of Tracing Apps and Its Implications

In addition to this, tracing apps were introduced as well. On March 19, during the Government session deputy Prime Minister Tigran Avinyan acting as Commandant during the SoE introduced the tracing app designed to fight against the pandemic.

He stressed: “We are envisaging to have a phone app which will enable people to provide information through answering questions, mentioning their location and phone number. Based on survey developed by World Health Organization people will be able to understand whether they have problems and what should be done in that case¹⁷”. His advisor later made clarifications stating that the app was provided by Iranians and has been adjusted to local conditions.

In fact, the tracing app was developed to relieve the pressure on the testing procedure thus providing opportunities for citizens to “autotest” themselves. This could have served as a platform for testing which was both less time-consuming and more cost-effective if it were not for the huge wave of discontent among ordinary citizens as well as the expert community¹⁸.

To be more particular, concerns among cybersecurity experts as well as human rights activists resulted in a movement with a demand to provide transparency regarding the mode and principles of the operation of the tracing app. They later addressed the Commandant’s office demanding to provide clarifications on the app that had earlier been introduced to the public. The office response to the quotation stated that the tracing app to fight Coronavirus had been developed

by Armenian programmers. However, the programmers themselves preferred to stay anonymous as they did not want to make public their voluntary work¹⁹.

Authorities suspended the data-tracking after the state of emergency ended.

Some cyber security experts during semi-structured interviews expressed their deep concerns regarding the trustworthiness of the app as it shortly after its usage it became clear that the app was in fact gathering information such as name, address, birth dates as well as traced the navigation of the user. As experts mention it is especially concerning given that the Iranian app was suspended by Google.

It is worthwhile to mention that given the imperative of stopping the spread of the pandemic governments all over the world had to resort to restrictive measurements and tracing and tracking. To avoid further exploitation of personal data and ensure citizens’ privacy a modernized “Convention 108+” was set forth with revised “standards for the protection of personal data which are compatible and reconcilable with other fundamental rights and relevant public interests²⁰”. Data Protection and Privacy issues in Armenia are provisioned by the Data Protection Law²¹,

17. Tigran Avinyan reports on the tracing app during Government session, 19 March, 2020; <https://bit.ly/2Xlsg7T>

18. The draft on installing app to use data is a rope around our neck, media expert’s opinion, May 24 2020; <https://antifake.am/am/news/1452>

19. Announcement on providing transparency regarding the personal data processing system, 6 June, 2020, <https://mdi.am/2020/06/06/statement-on-tracking-telecom-data/>

20. Joint Statement on the Right to Data Protection in the context of the COVID-19 pandemic, Council of Europe, Strasbourg, 30 March 2020;

21. Data Protection Law; <https://www.ilo.org/dyn/natlex/docs/ELECTRONIC/101975/123142/F1878536855/Ho-49-N.pdf>

Confidentiality and Data Protection Policy²² as well as the Statute of the Agency for Protection of Personal Data of the Ministry of Justice of the Republic of Armenia²³.

In addition to this, the anti-pandemic measurements in Armenia were undertaken in strong accordance with WHO recommendations taking all four forms enlisted above: tracing, testing, isolation and support. However, some of these measurements namely isolation and tracing appeared to be belated given the contradictory comments by officials and professionals on the nature of the virus and protective measurement. Speculations had it that a way out could be mass testing measurements and unfortunately, in the case of Armenia this was not possible because of the lack of proper economic resources. Therefore, it is important to note that no proper correlation can be found between regime type and efficacy of anti-pandemic measurements. In the case of Armenia after the Velvet revolution back in t 2018 democratic regime was reinforced by fair elections however this did not generate efficient fight against the pandemic. Instead the social-economic capacity of the country on one hand and the overall supply of trust towards the government and measurements undertaken by the latter become significant.

Public attitudes towards these measurements differ dramatically both among ordinary citizens as well as experts and professionals as well. To shed light on these attitudes, their overall impact on democracy and core liberties we have interviewed five (so far) experts on these

issues representing media, cybersecurity and politics.

On July 02, 2020 The Inquiry Committee for studying the effectiveness of the measures taken by the Government and the Commandant's Office to prevent the spread of the new coronavirus (COVID 19), to mitigate or eliminate the consequences of the epidemic in the fight against the virus, as well as to study the effectiveness and legality of restrictions of human rights and fundamental freedoms during the state of emergency was established. The main spheres of activities of the Committee includes mitigating the overall socio-economic difficulties and backlashes citizens have undergone due to the situation caused by Covid-19. Thus the Government has provided the following relieve packages for care takers, unemployed or those who were deprived of their jobs due to the pandemic situation, companies to be able to adjust working hours and preserve jobs, as well as those who were economically vulnerable²⁴.

Issues targeting human rights, their core liberties during the pandemic have mainly remained within the scope of the attention of the Institute of Human Rights' Defender both in terms of restrictions and citizens' complaints²⁵ and complaints made by media representatives²⁶.

In September, the government replaced the state of emergency with a special regime until January 11, which allows the national government to impose national or local lockdowns, and restrictions on gatherings and protests, without announcing a state of emergency²⁷.

22. Confidentiality and Data Protection Policy; [https://www.mfa.am/fr/priv_pol#:~:text=Processors-,The%20Law%20of%20Armenia%20on%20protection%20of%20personal%20data%20\(Data,authorised%20persons%2C%20and%20third%20parties.](https://www.mfa.am/fr/priv_pol#:~:text=Processors-,The%20Law%20of%20Armenia%20on%20protection%20of%20personal%20data%20(Data,authorised%20persons%2C%20and%20third%20parties.)

23. Statute of the Agency for Protection of Personal Data of the Ministry of Justice of the Republic of Armenia; <https://www.moj.am/en/structures/view/structure/32>

24. The responses received by the Investigative Committee, 19.03.2021; http://parliament.am/committees.php?do=show&ID=111215&month=all&year=2021&cat_id=801&lang=arm

25. https://ombuds.am/en_us/site/ViewNews/1137

26. Human Rights' Defender of the Republic of Armenia, Public Report, On the requirement to wear masks during TV broadcasts during the Covid-19 pandemic; <https://www.ombuds.am/images/files/ef9235b0e3470edd2088be0d83c8d2b7.pdf>

27. Human Rights Watch Report, Armenia, Events of 2020, <https://www.hrw.org/world-report/2021/country-chapters/armenia>

Expert Interviews

To complement the research expert interviews have been conducted in a semi-structured way. Experts come from various fields such as cyber security, political science and civil society. Interview questions include but are not confined to the following issues:

-  Do you believe that COVID tracing app is a threat to democracy in our country?

-  Do you believe that COVID tracing app is a threat to human rights in our country?

-  How the usage of personal data collected by the app can/should be regulated?

-  Did you record any cases of data violation by COVID-19 apps?

-  How would you see strengthening cooperation with the EU on this matter? (intergovernmental regulations just like regulations between the EU and the USA regarding processing personal data)

-  Do you think there is a necessity for awareness raising measurements among the society?

-  Do you think that this app has served as a tool for political manipulation.

 Interestingly, interview findings differ on some issues whereas we have a number of points that has been shared by all the interviewees so far.

The negative impact of the pandemic on the level of democracy and its violation of core human liberties has been basically shared by all the interviewees. The prevailing idea here is that if we choose life somewhat limited or death apparently the first one will be the preferable option. This brings us to the most debated issue within the overall logic anti-COVID measurements and that is the balance between public health and core civil liberties²⁸. Lockdown and social distancing may serve as major preventive measurements for spreading the virus but on the other hand they should not serve as tools for any kind of political repression as it is suspected in the case of Hungary and Poland²⁹.

“The balance between public health and human liberties is a deep philosophical issues. Humans have a number of rights. But there is one which is superior and that is the right of life. When choosing between being free or being alive I think most of us would choose the latter. Besides, while speculating on the liberties, in this case the right of free movements, we should take into account whether we do not harm other while we fight for the right of free movements and by doing so violating their right of life”.
(Davit Alaverdyan, media expert).

Besides, apparently in terms of democracy decline the trend according to experts has been observed even in the more democratic countries.

28. https://www.jstor.org/stable/pdf/26542062.pdf?ab_segments=0%252Fbasic_search_gsv2%252Ftest&refreqid=excelsior%3Ab2ac8ba01cd8c8f561c71e8477c0e8d4

29. Maximilian Schochow, VIEWPOINT Balancing public health and civil liberties in times of pandemic, Journal of Public Health Policy, Accepted: 7 October 2020.

“When it comes to the balance between public health and human rights I think it was diverted in the whole world. For example, even in most democratic countries repressions were sinusoidal based on the situational imperative of the intensity of its spread and the pace of the rise of new cases. So no exact opinions which model is the best one in terms of Covid-19 responses. Right now (February 2021) we may be facing the next huge wave of its spread and this can imply new restrictive measurements”
(Samvel Martirosyan, cyber security expert).

However, cybersecurity professionals expressed their concerns regarding the tracing apps one of which has been developed by an Iranian company, whereas the author of the other one is unknown.

“The Iranian app implied that people should “autotest”. It was neither effective nor safe. The second Armenian app was meant for awareness-raising measurements. It traced people’s contacts and movement. Its effectiveness is hard to overestimated as it was declared by the Government the 700 cases revealed by the app were few if compared to the overall number of cases revealed by July 2020. And if we take into consideration that it has been exploited until August then we can conclude then the percentage of newly revealed cases is statistically insignificant”
(Samvel Martirosyan, cyber security expert).

Therefore, we can never be sure how the data collected by the apps will be used in the future and in this regard not only violations of human rights can be registered but also this can be a threat to Armenia’s national security.

“In terms of human rights I see threats as well especially when it comes to the usage of the Iranian app which was recognized as harmful by a number of antivirus systems. People were told to install it without proper awareness of the app which gathered their data and monitored movement. The Armenian app which worked with mobile operators controlled both movement as well as social connections. No mechanism of social or any other form of control was de-

signed to ensure that this data would not be used for any other purposes or that it was destroyed, or that the system did not continue gathering information. We only had some declarative announcements, no explanation or feedback by the Institutions in charge for these issues”
(Samvel Martirosyan, cyber security expert).

Concerns regarding the tracing apps posing a threat on national security were shared by other experts as well. Some of them were not sure how the data collected by the app would be used.

To draw parallels with other experiences with tracing apps it is worthwhile to mention that in the case of apps used in the EU³⁰ their functioning has been strictly regulated by data protection laws which is an important aspect. Interestingly this idea is shared by another cyber security specialist who not only considers the two tracing apps as violations of human rights and mainly individual privacy and therefore a blow to democracy but also agrees that it is a direct threat to national security as well.

As for shifting opinions regarding anti-Covid measurements some see it quite restrictive and effective others think that although measurements were sensible on paper but not enough resources (Davit Alaverdyan, media specialist) and not enough will (Ashot Melikyan, media specialist) were involved in the process. Additionally, according to preliminary interview findings experts agree that the role of experts was underestimated especially in the beginning, i.e. in spring 2020. However, later the info center was established but by then the society had been torn between conflicting opinions on the pandemic and therefore this step was belated but welcomed anyway (Arthur Papyan, cyber security specialist).

According to some experts on media literacy, media manipulation in the times of coronavirus was unprecedented. And it is unfortunate that the flow of disinformation was partially fueled by high-ranking officials some of them representing the sphere of healthcare (Arman Navasardyan, David Alaverdyan).

Experts move on to say that *“Fake news’ pertaining to health-care issues are indeed hazardous, given due to them an ar-*

30. General Data Protection Rules, https://ec.europa.eu/info/law/law-topic/data-protection/eu-data-protection-rules_en

ray of people may give up the idea of vaccination, or even treatment which can bring about death in the end" (David Alaverdyan). Moreover, because of officially labeling it not dangerous and then rejecting that idea has actually arisen serious concerns and speculations among the population regarding the true nature of the virus. And, therefore, any step to counterbalance the spread of the infection including track-

ing apps has been low in the country according to the survey implemented within the framework of the given research.

Therefore, we may conclude that these apps were not effective at all having neither proper political backing nor being integrated into public-health system.

Survey Findings

Apart from the expert interviews an online survey was conducted to reveal public opinion we have conducted an online survey. The survey questionnaire consisted of three basic parts:

1. socio-economic inquiries,
2. inquiries on Government measurements to fight the pandemic,
3. inquiries on tracing app awareness level and public opinion.

The respondents of the survey have vast socio-economic background about 60 percent coming from the capital, 81% having higher education. The age of the respondents is varied as well however the majority of them is from ages 25-40. The majority of respondents (76.2%) were not happy with Government measurements the overwhelming majority (above 80%) thinking that they were strict however the implementation was not successful enough.

The 66.7% percent of respondents were aware of the tracing apps however only 23.8% of them had installed the on their gadgets given that 57.1% of potential users regarded them as dangerous in terms of personal data collection and its leak to unknown parties.

The survey also included public opinion on possible political and media manipulation during Covid-19. The survey results reveal that almost 53% of citizens saw possibilities of political manipulation triggered by Covid-19 38.1% thinking that the opposition has taken advantage of the situation to disgrace and blackmail the authorities, whereas only 14.3% of respondents think that the authorities have somehow used the situation to gain political dividends.

Evidence collected by the survey indicated that in terms of human rights restrictions respondents agree that there were human rights violations however 42.19 % think these restrictions were necessary, 28.6% think that they were somewhat necessary, only 23.8% regarded them as unnecessary.

Conclusion

The unprecedented outbreak of Covid-19 pandemic left complex impact on all spheres of human functioning such decision-making process, healthcare system as well as legal order of states. As mentioned above the main pandemic management strategies included testing, tracing and isolation. Among other spheres the democratic establishment and fundamental human rights were violated as a result of the fight against the spread of the virus.

Armenia was among those countries, which opted to install tracing apps as a tool of pandemic measurement. As cyber security and human rights experts state anti-pandemic measurements were a serious blow to both democracy and human rights in particular. This is partially because as discussed above the tracing apps were low quality and on the other hand the legislation in the country lacks capacity to assess the effectiveness, security, privacy and data protection aspects of such digital solutions. Against this background it is strongly recommended to reconsider the overall legal architecture in terms of data protection and privacy in the country. The situation around the pandemic should serve as a trigger to launch this process given that we live in a digital area and the major spheres of our everyday functioning is profoundly digitalized.

To do so it is important to gather specialists in the sphere such as human rights experts and specialists, cyber security specialist lawmakers as well as digital experts working in data protection mechanisms to come up with the most comprehensive and effective legislations in strong correspondence with international standards.

Apart from reorganization of data protection and privacy legislation it is crucial to establish social mechanisms of control of data protection as well. This could be especially helpful in the day of the pandemic given the lack of time and the need of ad-hoc solutions.

To arrive at long-term legislative solutions it is vital to strengthen cross-country cooperation to share experience and benefit from failures and achievements in the sphere. E.g. EU data protection authorities actively work in the direction providing statements and opinions on how to uphold data protection standards in their efforts to combat Covid-19³¹ especially in terms of reviving the balance between the right to health and the protection of personal data and human fundamental rights.

Another way to closely cooperate with the EU is through its institute of European Data Protection Supervisor³². Given that in the context of the outbreak of the pandemic tracing apps and data localization issues have been central to the political agenda of the Union. The institute of European Data Protection Supervisor closely cooperates with various EU institutions and European Data Protection Board to ensure that human rights violations are minimum. Therefore, strong cooperation with this institute will help to outline strategies of cooperation between various institutions inside the country on one hand and on the other boost international cooperation on the other.

Another avenue to cooperate and benefit from EU experience is through parliamentary bodies. Armenia as a parliamentary democracy actively cooperates with the EU within the framework of parliamentary activities. Therefore, this platform can serve as a brilliant opportunity to channel efforts to mitigate Covid-19 negative effects and to ensure that effectiveness of this kind of platforms.

31. https://fra.europa.eu/sites/default/files/fra_uploads/fra-2020-coronavirus-pandemic-eu-bulletin_en.pdf

32. European Data Protection Supervisor, https://edps.europa.eu/data-protection/our-work/subjects/covid-19_en

