



# Control over the Personal Archive: Reinterpreting the 'Right to be Forgotten' through the Perspective of Foucault's Discourse

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## ABSTRACT

Personal archives not only serve an administrative function, but also contain memories, identities, and agencies closely related to human rights. Therefore, personal archives give individuals control over whether they want to be remembered or forgotten, because not everyone wants to be part of the collective memory. So, the Right to be Forgotten (RtbF) exists as the individual's Right to delete their personal information and as a form of antithesis to archival management, while challenging the dominance of the narrative of archival institutions as epistemic and controlling authorities of collective memory. This study aims to reinterpret RtbF through the lens of Foucault's discourse to reveal the relationship between knowledge and power in the context of personal archive management practices. In this study, Foucault's discourse analysis is used to illustrate how the RtbF principle provides data subjects with a space of control over their personal archives. The results of the study show that RtbF serves as both a legal instrument and an ethical discourse that disrupts the hegemony of archival institutions while strengthening individual autonomy as data subjects. This concept emphasizes that personal archives are not merely repositories of information, but also representations of private rights that must be protected within the framework of personal data protection. This study emphasizes the importance of harmonizing RtbF with archival activities and argues that a design policy is needed to accommodate individuals' rights over their personal data in archival activities.

## KATA KUNCI

Arsip Personal  
Hak untuk Dilupakan  
Michel Foucault  
Perlindungan Data Pribadi  
Analisis Wacana

## ABSTRAK

Arsip personal tidak hanya berfungsi administratif, tetapi juga memuat memori, identitas, dan agensi yang berkaitan erat dengan hak asasi manusia. Oleh karena itu, arsip personal memberi individu kendali untuk menentukan apakah dirinya ingin diingat atau dilupakan. Karena tidak semua individu mau diingat dan menjadi memori kolektif. Sehingga konsep hak untuk dilupakan. Sehingga prinsip Right to be Forgotten (RtbF) hadir sebagai hak individu untuk menghapus informasi pribadinya dan sebagai bentuk antitesis dari pengelolaan arsip, sekaligus menantang dominasi narasi lembaga kearsipan sebagai episteme dan pengendali memori kolektif. Penelitian ini bertujuan mereinterpretasi RtbF melalui perspektif wacana Foucault guna mengungkap relasi pengetahuan dan kekuasaan dalam praktik pengelolaan arsip personal. Pendekatan analisis wacana Foucault digunakan untuk mendeskripsikan bagaimana prinsip RtbF memberi ruang kontrol bagi subjek data atas arsip pribadinya. Hasil kajian menunjukkan bahwa RtbF menjadi instrumen hukum sekaligus diskursus etis yang mendisrupsi hegemoni lembaga kearsipan, sekaligus



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memperkuat otonomi individu sebagai subjek data. Konsep ini menegaskan bahwa arsip personal bukan sekadar objek informasi, melainkan representasi hak privat yang harus dilindungi dalam kerangka perlindungan data pribadi. Penelitian ini menekankan pentingnya harmonisasi RtbF dengan kegiatan kearsipan, sehingga diperlukannya desain kebijakan yang mampu mengakomodasi hak-hak individu atas data pribadinya dalam kegiatan kearsipan.

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## 1. Introduction

In addition to transforming behavioral patterns, the digital Era has reshaped individuals' perceptions of concepts such as personal and collective memory. This shift occurs because information technology profoundly influences cultural, political, and social developments in society (Ginting et al., 2024). Data has emerged as a new form of power in the digital age, originating from human activities in cyberspace that leave digital footprints that can be collected, processed, analyzed, and utilized for diverse purposes. Search engines, for instance, retrieve and organize information by indexing users' digital traces during online interactions (Sari, 2020).

This includes personal data, which represents an individual's identity in cyberspace. Personal data or personal archives not only contain intimate information but also possess strategic value for those who collect and control it, thereby becoming a source of power. Data is no longer limited to the dissemination of information, but functions as a resource capable of producing new forms of power (Bigo et al., 2017). This illustrates how technological knowledge influences not only the methods of capturing and distributing information but also shapes perceptions and interpretations of that information.

In the contemporary Era, individuals or institutions who master information and technology hold positions of power. As Foucault argues, power operates not only repressively but also productively, creating realities through narratives, shaping meaning, and influencing individuals, groups, and organizations (Foucault, 1995). In this context, the relationship between knowledge and power shapes an episteme that serves as the foundation for constructing policy discourses (Ratnasari, 2015). Therefore, issues surrounding personal data protection (PDP) reflect the concrete workings of power and technology within society. In the current digital Era, privacy and personal data protection have become central themes within human rights discourse and represent a global issue rather than solely a national concern (Phireri, 2024).

Creating personal data or personal archives carries strategic value because such data are not only important for administrative purposes but also function as representations of an individual in the digital sphere within a complex system of control and power. This aligns with Gilliland and Caswell's (2016) perspective that personal archives serve not merely as administrative records but also as repositories of memory, identity, and individual agency. In this context, archives act as memory institutions that provide reliable evidence about a person or organization (Jimerson, 2003). This view is reinforced by IFLA-ICA (2020), which states that personal archives contain information related to individual identity that can be used for identification, contextualization, and recognition, making personal archives an inseparable component of archival records. Therefore, the management, processing, and preservation of archives must align with the legal frameworks governing the protection of personal data.

In the context of Indonesian regulatory understanding, personal data as defined in the Personal Data Protection Law (PDP) No. 27 of 2022 refers to information regarding an identifiable individual, either independently or when combined with other data, through electronic or non-electronic means, directly or indirectly (Undang-Undang Republik Indonesia Nomor 27 Tahun 2022 Tentang Pelindungan Data Pribadi, 2022). In line with this, the concept of personal

archives refers to records documenting a person's life journey that contain personal information across various media formats, forming an integral component of archival materials (Fachmi & Salim, 2023; Mirmani, 2014). Therefore, personal data and personal archives are closely interconnected, particularly regarding a person's digital footprint and identity representation in cyberspace.

Therefore, in designing technological infrastructure for digital archiving, personal archives must be understood not merely as components of an efficient information retrieval system, but as practices deeply rooted in human experience and activity (Kaye et al., 2006). Consequently, regulations such as the PDP Law are essential for defining the rights individuals possess over their personal data. This framework ensures that organizations are not solely engaged in archival processes but are also responsible for respecting, protecting, and upholding the human rights of citizens in Indonesia. In this regard, the PDP Law refers to individuals as data subjects rather than passive objects in the technical processes of data collection and storage. As data subjects, individuals retain full authority over their personal data that represents them in real-world contexts, recognizing this authority as a fundamental right. These provisions are closely linked to broader human rights principles, as personal data protection plays a critical role in safeguarding privacy, autonomy, and freedom from discrimination (Shehu & Shehu, 2023).

The rights stipulated in the regulation include the Right to access information, the Right to rectification, the Right to data portability, the Right to object to processing, and the Right to be Forgotten (RtbF). These rights are embedded in national regulations, namely the Personal Data Protection Law (PDP Law) No. 27 of 2022, as well as international frameworks such as the European Union General Data Protection Regulation (GDPR). This study focuses specifically on the RtbF due to its relevance to archival practices. RtbF refers to an individual's authority to request the immediate deletion of their personal data by a data controller (Your Europe, 2025), representing a necessary safeguard to protect individual rights amid technological progress (Phireri, 2024). This aligns with Zhang et al. (2024), who assert that RtbF is a crucial component of the fundamental human right to privacy. As a principle, RtbF challenges the dominant discourse of organizational institutions and disrupts the traditional narrative of archival institutions as neutral and objective custodians of truth. This shift is particularly significant because archival management is guided by core principles authenticity, reliability, integrity, and usability (SNI ISO, 2018).

From the perspective of the cultural paradigm, archives do not solely function as repositories of historical facts but serve as spaces for the production of meaning shaped through power relations. As cultural products rather than merely administrative records (Bramantya, 2023), archives embody values, perspectives, and narratives that reflect the interests and authority of the institutions that produce and manage them. Thus, it becomes crucial to understand the complex relationship between identity in this case, personal archives and organizational power in the context of digital-era archival practices.

This perspective necessitates an analytical approach that examines how narratives are constructed as social realities and used to reinforce power structures within organizations that manage personal archives. Discourse, as an inseparable component of societal practices, enables the examination of how power operates through language, representation, and classification in archival processes. In this sense, discourse can be used to analyze how narratives of power in personal data and archive management are produced, legitimized, and institutionalized, thereby shaping social realities and structuring power relations that underpin archival activities (Jufanny & Girsang, 2020).

In Michel Foucault's framework, discourse analysis extends beyond examining language content; it interrogates the power relations that shape how knowledge is produced, regulated, and legitimized. In *Discipline and Punish: The Birth of the Prison*, Foucault asserts that institutions and organizations construct individuals through mechanisms of discipline, normalization, and surveillance embedded within systems of knowledge and regulation (Foucault, 1995). In this context, archival institutions can be understood as actors that participate in the interplay between knowledge and power, particularly in the interpretation, classification, and control of personal archives or personal data. Consequently, the Right to be

Forgotten (RtbF) emerges as an effort by individuals to reclaim narrative authority over their personal records, to counter institutional control, and to renegotiate the politics of memory and identity. Foucault's discourse analysis thus emphasizes knowledge-producing practices that are localized and situated manifesting in classrooms, offices, bureaucratic spaces, and other sites where power subtly operates and materializes (Dhona, 2020).

Therefore, the tension between personal archives and the Right to be Forgotten (RtbF) situated between individual rights and the authority of archival institutions demonstrates the relevance of Foucault's discourse analysis in exposing how knowledge embedded in organizational and social policies functions as power. Discourse surrounding personal archives is not merely concerned with describing or representing archival objects; rather, it actively shapes subjects and governs how individuals are perceived and constructed (Foucault, 2002). Within the framework of personal data protection (PDP), the RtbF principle serves as a mechanism that returns power to individuals, enabling them to determine, restrict, or revoke the use of personal information managed by third parties, including archival institutions. Nonetheless, a review of the existing literature reveals that discussions of RtbF have predominantly focused on legal and technical dimensions, with limited exploration of the concept from an archival perspective. This indicates a research gap concerning the implications and challenges of RtbF within archival science and practice.

For this reason, the present study draws upon previous research, including the initial exploration of RtbF within archival studies, which was conducted through bibliometric mapping using both Dimensions.ai, a freely accessible database, and Scopus, a licensed academic database. Given that research on RtbF in the archival domain remains limited, the findings from this bibliometric analysis provide a foundational overview that can inform more focused and in-depth subsequent inquiries. (Fachmi et al., 2025; Fachmi & Grataridarga, 2023). Complementing this, research continued by Fachmi and Inamullah (2024) employed an argumentative literature review approach. It concluded that implementing RtbF in archival practices must critically consider user consent and privacy policies to ensure alignment with regulatory frameworks. Further contributions to archival discourse emphasize the use of hermeneutic discourse analysis, suggesting that archives should not only be positioned within practical or administrative boundaries but must also be examined through broader conceptual, democratic, and cultural lenses (Bramantya, 2023).

Therefore, the theoretical approach to personal archives within archival management, along with the principles of RtbF in the PDP Law, will be examined through a cultural studies perspective to deepen the understanding of the meaning of personal data and the institutional power embedded in the knowledge held by organizations. This leads to the central research question: How does the Right to be Forgotten influence the interpretation of control over personal archives managed by archival institutions or personal data controlling organizations? The study adopts Michel Foucault's discourse analysis to explore how power operates through knowledge and regulation in the management of personal archives. Beyond contributing conceptually and practically to archival studies, this research seeks to reaffirm that RtbF serves as an instrument through which individuals reclaim authority over their personal archives within the Personal Data Protection framework. It reinforces the argument that personal archives are not merely informational objects but representations of identity embodying fundamental individual rights that must be protected, respected, and recognized.

## 2. Research Methodology

The Literature Study method is employed in this research using a qualitative descriptive approach. A literature review is a method for critically and comprehensively examining theories, concepts, and prior studies related to the research topic (Sugiyono, 2020). This method does not seek to measure or quantify data, but rather to analyze, interpret, and uncover meanings surrounding the Right to be Forgotten (RtbF) in the context of control over personal archives.

To deepen this analysis, Foucault's discourse analysis is applied as the theoretical lens. This approach is relevant for empirically exploring the relationship between discourse and power, and for understanding how knowledge is constructed through social and institutional practices. The analysis is both historical and conceptual, utilizing key Foucauldian constructs such as

*discourse, episteme, Biopower, and the Panopticon* as analytical tools to identify the underlying structures that enable and legitimize dominant discourses on personal archives and personal data protection. Through this perspective, the study examines how these discourses gain authority, shape social reality, and achieve hegemony within archival practices and regulatory frameworks (Foucault, 2002; Silaswati, 2019).

Understanding discourse analysis involves examining how a discourse may be shaped by particular objectives and influenced by its intended audience. This is carried out through the application of critical discourse analysis. The process consists of three stages: first, identifying and describing all elements presented in the text to construct a comprehensive depiction of the social phenomena within it; second, analyzing whether cognitive and contextual factors have contributed to the formation of the discourse; and third, evaluating the discourse in relation to the social conditions of the community to determine its relevance and appropriateness (Eriyanto, 2011). This research adopts critical discourse analysis grounded in Michel Foucault's theoretical framework. Literature concerning personal archives from various sources was gathered and examined descriptively using Foucault's discourse analysis, enabling the emergence of a systemic understanding of power.

The analytical stages of Foucault's discourse in this study apply a critical-hermeneutic or phenomenological interpretation of discourse, specifically regarding RtbF and archival authority, drawing on Foucault's theoretical concepts. The process begins with the discursive construction phase, which entails excavating archival materials to trace the origins of discursive power. This is followed by the genealogical phase, which investigates the relationship between discourse and power by exposing the concealed power dynamics embedded within commonly accepted knowledge, revealing how such discourse is formed and legitimized through its sociopolitical relevance and historical context. The subsequent stage involves distilling the meaning of discourse by identifying breaks, contradictions, or gaps between its conceptual claims and practical application. The next phase examines the conditions that enable the endurance of the RtbF discourse over time (Hidayat & Tjahjono, 2021). Through these analytical stages, Foucault's discourse method demonstrates that RtbF is not merely a legal mechanism but a contested arena of knowledge and power that shapes archival practices and mediates the negotiation of individual sovereignty over personal data.

The data utilized in this study are drawn from scholarly literature, books, policy frameworks including the Personal Data Protection Law No. 27 of 2022 and associated regulations web-based sources, institutional reports, and other relevant documents. The literature was compiled from recognized academic databases such as SAGE, Taylor & Francis, Springer, and Google Scholar, as well as accessible open sources, using keywords including Right to be Forgotten, digital archive, personal archive, and related concepts. After undergoing a curation process, these materials were examined descriptively through Foucault's discursive lens to explore the power relations and dynamics established between data subjects and archival management institutions. The findings from this analysis are synthesized and articulated in a critical narrative to provide a holistic explanation that addresses the research questions posed.

### 3. Research and Discussion Results

#### 3.1. Archives as a Discourse of Power in Foucault's Perspective

From Foucault's point of view, archives are not limited to documents or historical artifacts; instead, they represent an entire knowledge system that shapes the boundaries of discourse and functions as a mechanism of control, producing relations of knowledge and power. Archives operate as an underlying set of rules, often invisible, that determine which statements are permissible or restricted at specific moments in time (Foucault, 2002). In this way, archives function as a discursive force through their roles as legal, administrative, historical, and forensic evidence (Cifor & Gilliland, 2016). They constitute a discursive framework that, within a particular historical context, influences what can be expressed, conceptualized, or recognized as knowledge. Consequently, archives do not merely symbolize power; they serve as the very site where power mechanisms are exercised. The regulatory system that enables knowledge to surface ultimately becomes the benchmark for defining truth.

Power is not viewed merely as repression or ideological domination over individual freedom, but as a force that permeates society's structures, often blurring the very definition of freedom. Power is generative, producing subjects through mechanisms of surveillance and documentation. Within archival practice, this is evident in how archivists navigate the tension between honoring the rights of data subjects and fulfilling obligations related to information accessibility and research needs. Since the notion of privacy intersects with every phase of archival work, from record creation, appraisal, and description to the delivery of archival services (Windon & Youngblood, 2024), it becomes clear that the knowledge produced through archives cannot be regarded as neutral. Consequently, such knowledge persistently interacts with and shapes subject identity while governing subjectivity.

In the digital age, archives have become both the operational rules and the medium through which freedom is negotiated within the discourse of information power. The process that shapes how a data subject is represented through personal archives is understood as discourse. In contrast, the unseen patterns that subtly influence and organize data interpretation are what Foucault terms the episteme. Episteme consists of networks of unconscious structural rules that establish the governing regime of knowledge within a particular historical moment (Foucault, 1970). This ultimately converges into a politics of memory that exercises complete authority over which archives and, therefore, which truths are accessible to the public. Consequently, the principle of archive democratization becomes essential, compelling archival practitioners to exercise greater caution and comply with ethical guidelines when handling personal archives containing sensitive information (Putra, 2021).

### *3.2. Power Inequality, Collective Memory, and Privacy in the Digital Age*

The implications of this uneven distribution of power and knowledge can be seen in the ways collective memory is shaped and governed by particular authorities through archival management since archives exert influence over the structure and trajectory of shared memory and national identity, as well as how meaning is formed for individuals, communities, and groups (Brown, 2013). Archival authorities effectively hold the capacity to curate history, diminishing specific collective memories and constraining counter-narratives in the interest of a perceived common good. Power, therefore, establishes the parameters of collective remembrance, determining what is emphasized and what is erased. Conversely, within the realm of personal archives, individuals retain the agency to decide whether they wish to be remembered or to disappear from the public record. Recognizing that not all individuals desire to be embedded in collective memory, the concept of the Right to be Forgotten emerges as a counterbalance to institutional archival authority. While access to information remains a central value in the digital age, much archival information continues to be restricted due to ethical obligations and privacy protections (Jaillant, 2022).

The shaping of power relations within data-driven narratives is globally normalized as a form of hegemonic memory practice. Within organizational recordkeeping, the remnants of colonial frameworks and the persistence of colonial knowledge regimes ensure that every archival act embodies and reproduces specific value systems and hierarchies of power (Hurley et al., 2024). This dynamic equally applies to personal archives, which are governed by dominant power discourses through an episteme that defines the boundaries of freedom in the digital sphere. At this point, archival institutions take on panoptic characteristics, positioning the archive as a central site of power-knowledge production. Consequently, data subjects are gradually stripped of agency over their digital embodiment through expansive surveillance conducted by organizations responsible for managing personal data. From the perspective of those being monitored, the information originates from their own actions and identity markers. However, the digital representation of the self is effectively reduced to an object of supervision and a commodified asset controlled by personal data management institutions (Hakkala & Koskinen, 2022; Wahyuni, 2025).

### *3.3. PDP, RtBF Regulations and Implementation Challenges*

This situation highlights the critical need for legal safeguards that protect the rights of data subjects. In response, Indonesia has enacted a dedicated legal framework, the PDP Law, designed to prevent unauthorized and excessive exploitation of personal data, establishing it as

the central legal foundation for ensuring citizens' rights over their personal information. Within this regulation, the RtbF is positioned as a formal acknowledgment of an individual's Right to erase or remove personal data to defend their dignity and privacy. Since the collection or dissemination of personal data without explicit consent constitutes a breach of privacy rights, individuals retain the authority to decide whether their personal information should be disclosed or permanently deleted (Candra et al., 2020).

Although existing regulations emphasize the importance of the Right to privacy, in practice, the current digital landscape remains driven by the logic of openness and radical transparency, which does not always position the data subject as the primary beneficiary. This reflects a tension between individual prerogatives and the episteme of hegemonic digital openness. In the contemporary digital Era, the dominant truth taken for granted is that data should be disclosed as widely and freely as possible. Historical context becomes crucial in shaping discourse and establishing standards of knowledge production. When the internet functions simultaneously as discourse and as the center of knowledge control, personal archives are transformed into objects of power. In Foucauldian terms, power correlates with the extent to which knowledge can be accumulated, accessed, and circulated from these archives. If in previous historical periods power was exercised through the restriction, classification, and selective release of archives, the current Era reverses this logic opening data as broadly as possible under the banner of freedom and public interest thereby ensuring the reproduction and continuity of power itself.

The increasingly blurred boundary between publicly accessible archives and personal archives constitutes a strategic form of power in the contemporary digital landscape. Historically, the politics of memory operated through the selective preservation of archives maintaining records that legitimized dominant narratives while erasing those deemed irrelevant or threatening to the existing power structure. As Derrida and Prenowitz (1996) assert, *there is no political power without control over the archive or over memory itself*. However, technological advancements introduce new complex challenges, particularly regarding accessibility, privacy, and the credibility of disseminated information. In this context, the enactment of the PDP Law represents a significant step forward in reaffirming individuals' human rights over their personal data. It cultivates greater awareness that the Right to live peacefully must remain protected amidst the growing ease with which data can be tracked, distributed, and processed. Ultimately, such regulations offer a crucial sense of security by ensuring that individuals retain the Right not to be disturbed and the Right to privacy (Kurnianingrum, 2020).

Viewed denotatively within a semiotic framework, the PDP Law positions the data subject not merely as an object of regulatory concern but as a human being endowed with constitutional rights that must be guaranteed through state policy (Fachmi & M. Hanif Inamullah, 2024). Consequently, personal archives do not solely represent objective information; they simultaneously convey the subjective dimension of the data subject's identity and existential presence. However, constitutional protection of data subjects does not automatically eliminate the emergence of new, subtle, and concealed forms of power in the digital age. Power continues to operate by targeting individual subjectivity through the regulation and governance of personal archives, which Foucault conceptualizes as *Biopower*. This mechanism organizes the administration and optimization of human life through control over the body, including in this context the exploitation of personal data (Mack, 2022). While archives and institutional actors manage personal data through formalized, legally recognized systems, the advent of personal data protection frameworks compels these institutions to reassess entrenched power relations and to incorporate a fundamental respect for the autonomy and dignity of data subjects.

In reality, power over personal archives is no longer held exclusively by institutions; under PDP regulations, organizations are required to recognize and uphold the rights of data subjects, particularly when managing personal archives that may disclose the most private dimensions of an individual. However, the discourse of digital freedom simultaneously produces a paradox: data subjects ostensibly gain rights over their personal data, but their "digital bodies" remain systematically monitored and regulated by organizational structures. Within Foucault's framework, the panoptic model generates a form of self-discipline in which transparency and perpetual visibility function as subtle yet effective instruments of power (Foucault, 1995).



Although PDP regulations formally reinforce individual rights, in practice, organizational power over personal archives continues to operate through standardized bureaucratic procedures that have long been institutionalized. This mechanism is often perceived as neutral disciplines data subjects unconsciously through archival processes such as Archive Retention Schedules (JRA) and archival appraisal, which are, in fact, embedded with institutional priorities and interests. Therefore, archival organizations must not only comply procedurally with the new regulatory framework but also internalize its philosophical foundation to ensure that personal archive management genuinely respects the autonomy, dignity, and rights of the individual.

A paradox emerges when individuals no longer wish their personal archives to be stored or processed by organizations. Under conventional archival practices, data subjects risk losing control over their personal data once it enters the organizational archive. The introduction of the PDP Law addresses this by not only guaranteeing data protection rights but also formally recognizing the individual's Right to be Forgotten (RtbF). Similarly, GDPR Part 3, Article 17, provides individuals with the legal Right to request the erasure of personal data when it is no longer relevant or desired by the data subject. This shift is crucial because it compels archival institutions to recalibrate their practices and acknowledge that the principle of perpetual preservation cannot be applied in an absolute sense.

At the global level, GDPR is widely regarded as the “*Golden Standard*” of digital data protection because it offers (1) comprehensive regulatory scope, (2) extraterritorial applicability, (3) robust enforcement mechanisms, (4) status as a primary regulatory reference for many states, and (5) accountability frameworks that foster institutional transparency and public trust. GDPR, therefore, is not merely a European Union regulation; it functions as an international benchmark shaping the evolution of data governance in the Era of digitalization and globalization. For this reason, GDPR remains more extensive and structurally robust than Indonesia's PDP framework, serving both as precedent and a blueprint for the formulation of national regulations. (Andrew & Baker, 2021; Buttarelli, 2016). Nevertheless, its practical application reveals a different landscape. Fadilah et al. (2025) demonstrate that the implementation of RtbF in Indonesia, particularly in cyber-pornography cases, still relies on lengthy, complex, and costly litigation processes. This contrasts sharply with countries such as Australia, which provide simplified administrative mechanisms through personal data deletion portals. These disparities affirm that although the PDP Law recognizes the Rtb conceptually, its operationalization in practice remains limited, fragmented, and not yet as efficient or accessible as global standards might demand in other countries.

When dealing with personal archives, organizations bear the ethical and legal responsibility to respect individuals' rights over their personal data, making the Right to be Forgotten (RtbF) an essential principle embedded within contemporary archival governance. Tablecloth (2013) argues that RtbF serves as a crucial instrument for safeguarding data subjects' sovereignty over the information that represents them. In line with this, Syailendra et al. (2024) emphasize that individuals retain authority over their privacy and, therefore, possess the Right to regulate how their existence is represented in personal archives. This indicates that personal data cannot be subordinated to standardized systems or institutional procedures that undermine fundamental individual rights.

From a Foucauldian perspective, RtbF can be understood as a form of epistemic discontinuity, an interruption of the dominant archive-centric knowledge regime that historically positioned institutions as the primary interpreters, custodians, and beneficiaries of personal data. By allowing individuals to reclaim control over their digital identity and determine the fate of their archived information, RtbF challenges the monopoly of organizational narratives and dismantles the disciplinary framework through which subjects were once rendered visible, measurable, and governable. In this sense, RtbF is not merely a legal mechanism but a critical reconfiguration of power–knowledge relations in the digital Era.

As Floridi (2021) asserts regarding the Right to be Forgotten, the processes of "linking and delinking" have become ontological acts that shape the landscape of information itself. The map, understood as the network of what is connected, retrieved, and remembered, has become the new battleground upon which power over information is exercised. In this sense, RtbF is not



merely a technical mechanism but an ontological act of reclaiming control over one's identity within the framework of Personal Data Protection (PDP), including its implications in digital environments. This perspective stands in contrast to the traditional notion of archives as immutable records of past events that serve historical purposes (Putra, 2021). Within the PDP context, personal archives constitute a critical exception; they are not confined to functioning as historical sources but are intrinsically tied to the protection of the privacy and dignity of the individual.

### 3.4. *RtbF as a New Episteme and the Ethical Implications of Personal Archive Management*

The shift in perspective on the management of personal archives, driven by the RtbF principle within the PDP policy framework, signals an epistemic discontinuity rather than mere compliance with state regulation. This change opens the space for archival practice to recognize and uphold the inherent rights embedded within personal archives as they are managed. Positioned as a key entitlement within PDP, the RtbF disrupts the long-standing dominance of traditional archival management systems, including the Archive Retention Schedule (JRA) framework commonly applied in archival processes. As noted by Fachmi and Inamullah (2024), the legal acknowledgment of RtbF "has a significant impact on the concept of privacy in archive management, yet presents potential conflict with established archival principles in the JRA, particularly in relation to differing interpretations of the appropriate duration for retaining personal archives."

The RtbF principle challenges conventional archival perspectives, particularly the total archival strategy, which treats personal materials, such as private correspondence, as essential components in constructing collective historical memory (Putra et al., 2023). However, such an approach does not always correspond with an individual's desire to exclude their personal memory from collective narratives. RtbF creates the opportunity to renegotiate the subject's position within archival practices. Whereas archival institutions traditionally exercise full authority over the archival corpus, the implementation of PDP now allows data subjects to assert their autonomy and control over the narratives embedded in their personal archives.

Furthermore, to gain a deeper understanding of how the subjectivity of personal archive owners is often overlooked in digital archive management, Foucault's approach of knowledge archaeology can be employed. This method allows for the examination of discourse structures that are not explicitly articulated in archival practices, particularly within the PDP framework. The Right to be Forgotten (RtbF) under the PDP Law represents a novel policy in Indonesia, and knowledge of its implications remains limited both legally and epistemologically. According to Foucault (2002), "*archaeology does not aim to define the thoughts, representations, images, themes, or preoccupations concealed or revealed in discourses, but rather the discourses themselves, as practices governed by specific rules.*" This implies that the focus of knowledge archaeology lies not in hidden meanings but in the rules that allow a discourse to emerge and dominate. Consequently, RtbF can be interpreted as a disruption within the hegemonic archival management framework, challenging the conventional logic of the JRA and empowering data subjects to participate in determining the lifespan of their personal archives within the system.

Under Article 8 of the PDP Law No. 27 of 2022, data subjects are granted the Right to request the deletion or destruction of their personal data. This provision recognizes the private dimension of citizens while providing normative legitimacy for the removal of personal archives at the owner's request. The Right to be Forgotten (RtbF) functions not only as an alternative discourse but also as a legal instrument that enables data subjects to assert sovereignty over their personal data. In this way, RtbF serves as a bridge linking individual human rights with organizational responsibility in personal archive management, compelling archive managers to uphold significant social responsibility in interpreting privacy matters until they are formally codified by law (Dressler & Kearns, 2023).

However, it must be recognized that an organization's responsibility extends beyond merely enforcing regulations; it also involves understanding archives within the broader context of power relations and identity formation. Personal archives form part of collective memory, yet archival practices generally follow a linear process: information is created, received, used as evidence, preserved, and treated as an asset for fulfilling legal obligations and transactions (SNI

ISO, 2018). One principle of integrity is that archives remain complete and unaltered; however, the Right to be Forgotten introduces an additional dimension: the recognition of individual human rights in determining the management and deletion of personal archives. In today's evolving information landscape, as Floridi (2021) notes, data can be connected or disconnected, searchable or hidden, visible or invisible, reflecting new conditions of information existence. Privacy issues are inherently complex, difficult to define, and challenging to implement in practice (Dressler & Kearns, 2023).

Hegemonic practices in archive management, particularly those emphasizing long-term preservation, must be critically examined through Foucault's discourse perspective. As Henttonen (2017) observes, the Right to be Forgotten (RtbF) principle challenges the traditional notion of permanent preservation. Archival processes that appear neutral may, in reality, overlook the fluid and evolving nature of individual subjectivity. RtbF serves as a form of resistance to institutional control over personal archives, enabling data subjects to remove outdated information and release past identities, reflecting a self-transformative process that cannot be rigidly fixed. This principle introduces epistemic discontinuity into digital discourse. Using Foucault's archaeological approach to knowledge, RtbF can be understood as a mechanism for freeing the subject from archival power, disrupting panoptic surveillance, and creating space for individuals to shape their own existence more autonomously. Consequently, the Right to be Forgotten is a critical consideration for archive managers in the contemporary Era. Since archival management lies at the core of privacy concerns, the activities involved aim to transfer information across different contexts, locations, and temporal frames (Henttonen, 2017).

#### 4. Conclusion

This study aims to reinterpret the Right to be Forgotten (RtbF) within the framework of personal archive management in organizations. Power shapes the standards of collective memory, deciding what is highlighted and what is erased. However, in the realm of personal archives, individuals have the authority to choose whether they wish to be remembered or forgotten. Since not everyone desires inclusion in collective memory, RtbF serves as a countermeasure against archival institutions that have traditionally exercised total control. This principle represents an epistemic discontinuity, challenging the prevailing narratives of archive management concerning individual human rights. From a Foucauldian perspective, archives are not merely neutral objects but discursive arenas where power is exercised through the organization, oversight, regulation, and recording practices of archival institutions. The inclusion of RtbF in the PDP repositions individuals as autonomous agents, enabling them to manage and delete their personal data with their explicit consent, thereby preventing unauthorized processing or storage by third parties. This enhances the data subject's leverage and strengthens their authority in influencing how organizations handle their personal information. RtbF operates as a form of resistance against the panoptic and organizationally driven control of personal archives. This principle is consistent with Article 8 of Indonesia's PDP Law No. 27 of 2022, which recognizes, safeguards, and upholds individuals' human rights concerning the removal of inappropriate personal data.

Thus, the Right to be Forgotten (RtbF) is not merely a legal obligation under the PDP regulations; it also serves as an ethical principle in contemporary discourse. RtbF offers an opportunity to reinterpret the notion of control over personal archives and encourages archive managers to critically reflect on individual rights within archival practices, particularly as they navigate power dynamics between institutions and data subjects. Foucault's archaeological approach to knowledge reveals that archival activities have historically been governed by fixed, standardized discursive structures, leaving little space for discourse on RtbF and for individual control over personal archives within policy frameworks. By introducing RtbF, a more democratic and context-sensitive archiving paradigm can emerge, one that better accommodates the dynamics of human subjectivity in the contemporary Era.

While this study aims to explore RtbF through the lens of Foucault's discourse of power, it is limited in scope and remains primarily conceptual. Future research could expand on this by employing different methodologies or perspectives, including empirical investigations of RtbF

implementation in Indonesian archival organizations. Practically, this study underscores the need to harmonize RtbF with archival practices, calling for policy designs that recognize individuals' rights over their personal data within archival management. Archive managers and institutions must adapt their approaches, including developing appropriate procedures, ethical standards, privacy policies, and capacity-building programs to ensure adequate protection of privacy and personal data.

## References

- Andrew, J., & Baker, M. (2021). The General Data Protection Regulation in the age of surveillance capitalism. *Journal of Business Ethics*, 168, 565–578. <https://doi.org/10.1007/s10551-019-04239-z> Download citation
- Bigo, D., Carrera, S., Guild, E., Bigo, D., Carrera, S., Guild, E., Bans, T., Guild, E., Bigo, D., & Carrera, S. (2017). Trump's Travel Bans : Harvesting personal data and requiem for the EU-US Privacy Shield. *CEPS Policy Insights*, 1–7. <https://sciencespo.hal.science/hal-03458772>
- Bramantya, A. R. (2023). Konsep “Teks” dalam Paradigma Hermeneutika dan Postmodernisme serta Relevansinya Terhadap Kearsipan. *Khazanah: Jurnal Pengembangan Kearsipan*, 16(2), 157–176. <https://doi.org/10.22146/khazanah.82039>
- Brown, C. (2013). Memory, identity and the archival paradigm: introduction to the special issue. *Archival Sci*, 13, 85–93. <https://doi.org/10.1007/s10502-013-9203-z>
- Buttarelli, G. (2016). The EU GDPR is a clarion call for a new global digital gold standard. *International Data Privacy Law*, 6(2), 77–78. <https://doi.org/10.1093/idpl/ipw006>
- Candra, A. A., Suryadi, K., Rahmat, & Nurbayani, S. (2020). Building The Identity Of Indonesian Citizenship In The Digital Age. *INTERNATIONAL JOURNAL OF SCIENTIFIC & TECHNOLOGY RESEARCH*, 9(3), 3650–3652.
- Cifor, M., & Gilliland, A. (2016). Affect and the archive, archives and their affects: an introduction to the special issue. *Archives and Museum Informatics*, 16(1), 1–6. <https://doi.org/10.1007/s10502-015-9263-3>.
- Derrida, J., & Prenowitz, E. (1996). *Archive Fever: A Freudian Impression*. University of Chicago Press.
- Dhona, H. R. (2020). Analisis Wacana Foucault dalam Studi Komunikasi. *Journal Communication Spectrum*, 9(2), 189–208.
- Dressler, V., & Kearns, J. (2023). Probing archivists' perceptions and practices in privacy. *The Journal of the Archives and Records Association*, 44(2), 175–201. <https://doi.org/10.1080/23257962.2022.2073207>
- Eriyanto. (2011). *Analisis Wacana(Pengantar Analisis Teks Media)*. LKiS.
- Fachmi, A., & Grataridarga, N. (2023). Analisis Bibliometrik Prinsip Hak Untuk Dilupakan (Right To Be Forgotten) dalam Penelitian Kearsipan Yang Terindeks di Dimensions.AI. *Jurnal Imam Bonjol: Kajian Ilmu Informasi Dan Perpustakaan*, 7(2), 136–151. <https://doi.org/10.15548/jib.v7i2.305>
- Fachmi, A., & M. Hanif Inamullah. (2024). Harmonisasi Prinsip ' Right to be Forgotten ' pada Jadwal Retensi Arsip. *Khazanah: Jurnal Pengembangan Kearsipan*, 17(2), 159–182. <https://doi.org/10.22146/khazanah.91729>
- Fachmi, A., & Salim, T. A. (2023). Upaya Potensi SAR Bandung dalam Preservasi Arsip Personal Sebagai Bentuk Mitigasi Gempa Sesar Lembang. *Lentera Pustaka: Jurnal Kajian Ilmu Perpustakaan, Informasi Dan Kearsipan*, 9(1), 53–64. <https://doi.org/10.14710/lenpust.v9i1.47829>

- Fachmi, A., Yudhanto, S., & Nurfitri, A. (2025). Pemetaan Bibliometrik Perkembangan Penelitian Bidang Kearsipan dengan Topik ' Right to be Forgotten ' pada Scopus A Bibliometric Mapping of Archival Research Development on the Topic of ' The Right to Be Forgotten ' on Scopus Badan Riset dan Inovasi Indon. *Palimpsest: Jurnal Ilmu Informasi Dan Perpustakaan*, 16(1), 1–16.
- Floridi, L. (2021). "The Right to be Forgotten": A Philosophical View. *SSRN Electronic Journal*, May 2021. <https://doi.org/10.2139/ssrn.3853478>
- Foucault, M. (1970). *The Order of Things: An Archaeology of the Human Sciences*. Translated from the French by A. M. Sheridan Smith. Pantheon Books.
- Foucault, M. (1995). *Discipline and Punish: the Birth of the Prison* (A. Sheridan, Trans.). Vintage Books. (Original work published 1977). Vintage Books.
- Foucault, M. (2002). *The Archaeology of Knowledge and the Discourse on Language*. Translated from the French by A. M. Sheridan Smith. Routledge.
- GDPR. (2016). *General Data Protection Regulation*. Intersoft Consulting. <https://gdpr-info.eu/art-17-gdpr/>
- Gilliland, A. J., & Caswell, M. (2016). Records and their imaginaries: imagining the impossible, making possible the imagined. *Archival Science*, 16, 53–75. <https://doi.org/10.1007/s10502-015-9259-z>
- Ginting, D. C. A., Rezeki, S. G., Siregar, A. A., & Nurbaiti. (2024). Analisis Pengaruh Jejaring Sosial Terhadap Interaksi Sosial di Era Digital. *Pusat Publikasi Ilmu Manajemen*, 2(1), 22–29. <https://ejournal-nipamof.id/index.php/PPIMAN/article/view/280>
- Hakkala, A., & Koskinen, J. (2022). Personal Data Protection in the Age of Mass Surveillance. *Journal of Computer Security*, 30(2), 265–289. <https://doi.org/10.3233/JCS-200033>
- Henttonen, P. (2017). Privacy as an archival problem and a solution. *Archival Science*, 17(3), 285–303. <https://doi.org/10.1007/s10502-017-9277-0>
- Hidayat, M. N., & Tjahjono, T. (2021). Analisis Wacana Kritis Michel Foucault dalam Puisi Kembalikan Indonesia Padaku Karya Taufik Ismail. *Sastronesia: Jurnal Pendidikan Bahasa & Sastra Indonesia*, 9(4), 66–77. <https://doi.org/10.32682/sastronesia.v9i4.2212>
- Hurley, C., McKemmish, S., Reed, B., & Timbery, N. (2024). The power of provenance in the records continuum. *Arch Sci*, 24, 825–845. <https://doi.org/10.1007/s10502-024-09463-9>
- IFLA. (2020). *IFLA-ICA Statement on Privacy Legislation and Archiving*. <https://www.ifla.org/publications/ifla-ica-statement-on-privacy-legislation-and-archiving/>
- Jaillant, L. (2022). How can we make born-digital and digitised archives more accessible? Identifying obstacles and solutions. *Arch Sci*, 22, 417–436. <https://doi.org/10.1007/s10502-022-09390-7>
- Jimerson, R. C. (2003). Archives and memory. *OCLC Systems & Services: International Digital Library Perspectives*, 19(3), 89–95. <https://doi.org/10.1108/10650750310490289>
- Jufanny, D., & Girsang, L. R. M. (2020). TOXIC MASCULINITY DALAM SISTEM PATRIARKI (Analisis Wacana Kritis Van Dijk Dalam Film "Posesif"). *Semiotika: Jurnal Komunikasi*, 14(1), 8–23. <https://doi.org/10.30813/s:jk.v14i1.2194.g1775>
- Kaye, J., Jofish, Vertesi, J., A., S., & Dafoe, A. (2006). To Have and to Hold: Exploring the Personal Archive. *Proceedings of the 2006 Conference on Human Factors in Computing Systems*. <https://doi.org/10.1145/1124772.1124814>
- Kurnianingrum, T. P. (2020). Urgensi Perlindungan Data Pribadi Konsumen di Era Ekonomi Digital. *Jurnal Kajian*, 25(3), 197–216.
- Mack, Z. (2022). Delegating Death: Foucault, Biopower, and Race in the Covid-19 Pandemic. *Living Histories*, 1, 8–13.
- Mantelero, A. (2013). The EU Proposal for a General Data Protection Regulation and the roots

- of the 'right to be forgotten.' *Computer Law & Security Review*, 29(3), 229–235. <https://doi.org/10.1016/j.clsr.2013.03.010>
- Mirmani, A. (2014). *Pengantar Kearsipan* (2nd ed.). Universitas Terbuka.
- Phireri. (2024). The Urgency of Human Rights Protection in the Digital Age from the Perspective of Data Security and Privacy. *International Journal of Business, Law, and Education*, 5(2), 2596–2600. <https://doi.org/10.56442/ijble.v5i2.905>
- Putra, P. (2021). Prinsip Demokratisasi Arsip: Suatu Konsep untuk Menjembatani Antara Kearsipan, Penulisan Sejarah, dan Pascamodernisme. *Khazanah: Jurnal Pengembangan Kearsipan*, 14(1), 39–56. <https://doi.org/10.22146/khazanah.56741>
- Putra, P., Purnamayanti, A., & Maryani, E. (2023). Memahami Lebih Dalam tentang Teori Siklus Hidup, Model Kontinum Rekod dan Konsep Arsip Total untuk Implementasi di Institusi dan Organisasi. *Jurnal Ilmu Informasi, Perpustakaan Dan Kearsipan*, 25(2), 102–115. <https://doi.org/10.7454/JIPK.v25i2.1091>
- Ratnasari, A. (2015). *Relasi Kekuasaan, Pengetahuan, Dan Teknologi Dalam Tiga Rezim (Studi Kasus Politik Teknologi Informasi Dan Komunikasi Pada Tiga Rezim, Rezim Soekarno, Orde Baru Dan Pasca Orde Baru* [Universitas Brawijaya]. <https://repository.ub.ac.id/id/eprint/121167/>
- Sari, E. A. (2020). Pengaruh Aktivitas Penelusuran Informasi Terhadap Jejak Digital di Youtube Bagi Generasi Millenial. *BIBLIOTIKA*, 4(1), 42–55. <https://journal2.um.ac.id/index.php/bibliotika/article/view/14755/5992>
- Shehu, V. P., & Shehu, V. (2023). Human rights in the technology era – Protection of data rights. *European Journal of Economics, Law and Social Sciences*, 7(2), 1–10. <https://doi.org/10.2478/ejels-2023-0001>
- Silaswati, D. (2019). Analisis Wacana Kritis dalam Pengkajian Wacana. *Metamorfosis*, 12(1), 1–10. <https://doi.org/10.55222/metamorfosis.v12i1.124>
- SNI ISO 15489-1:2016: Information and Documentation Records Management, Pub. L. No. 15489- 1:2016 (2018).
- Sugiyono. (2020). *Metode penelitian kuantitatif, kualitatif, dan R&D*. Alfabeta.
- Syailendra, M. R., Lie, G., & Sudiro, A. (2024). Personal Data Protection Law in Indonesia: Challenges and Opportunities. *Indonesia Law Review*, 14(2), 56–72. <https://scholarhub.ui.ac.id/ilrev/vol14/iss2/4>
- Undang-Undang Republik Indonesia Nomor 27 Tahun 2022 Tentang Pelindungan Data Pribadi (2022).
- Wahyuni, W. (2025). *Data Pribadi Jadi Komoditas, Perusahaan Media Mesti Perkuat UU PDP*. Hukumonline.Com. <https://www.hukumonline.com/berita/a/data-pribadi-jadi-komoditas--perusahaan-media-mesti-perkuat-uu-pdp-lt679242ba1bb25/>
- Widon, K., & Youngblood, J. (2024). Privacy Considerations in Archival Practice and Research. In *Human Privacy in Virtual and Physical Worlds: Multidisciplinary Perspectives* (pp. 205–234). Palgrave Macmillan Cham. <https://doi.org/10.1007/978-3-031-51063-2>
- Your Europe. (2025). *Data protection under GDPR*. Your Europe. [https://europa.eu/youreurope/business/dealing-with-customers/data-protection/data-protection-gdpr/index\\_en.htm](https://europa.eu/youreurope/business/dealing-with-customers/data-protection/data-protection-gdpr/index_en.htm)
- Zhang, D., Finckenberg-Broman, P., Hoang, T., Pan, S., Xing, Z., Staples, M., & Xu, X. (2024). Right to be forgotten in the Era of large language models: implications, challenges, and solutions. *AI and Ethics*. <https://doi.org/10.1007/s43681-024-00573-9>