

# **Research on the Parties Eligible to Initiate Civil Public Interest Litigation Regarding Personal Information Protection**

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**Abstract:** Civil public interest litigation serves as a crucial mechanism for protecting public interests and holds significant importance in the realm of personal information protection. However, current judicial practice reveals that legal provisions regarding the parties eligible to initiate civil public interest lawsuits concerning personal information protection remain relatively ambiguous. This paper therefore focuses on establishing a framework for identifying such plaintiffs, examining key issues-including the definition of plaintiff scope, qualification criteria, and coordination mechanisms-by analyzing existing laws, regulations, and practical challenges. Building upon this analysis, the study systematically proposes a framework for identifying plaintiffs in personal information protection cases, aiming to maximize the role of public interest litigation in safeguarding personal data rights and ensuring their effective protection.

**Keywords:** Personal Information Protection; Civil Public Interest Litigation; Litigating Party; Coordination Mechanism; Institutional Framework

## **1. Introduction of the Problem**

With the development of the digital economy, personal information has become a vital social resource and commercial asset. The rapid advancement of information technology has made the collection, storage, transmission, and utilization of personal data increasingly convenient, yet it has also given rise to issues such as data breaches and privacy violations. According to statistics released by the Cyberspace Administration of China, the country's internet user base exceeded billion in 2023, with frequent incidents of personal information security breaches occurring nationwide. Between 2021 and 2023 alone, over 5,000 cases involving billions of personal data records were investigated and addressed.

Consequently, personal information protection has become a focal point of societal concern, with significant progress achieved in legislative frameworks-particularly through the enactment of the Personal Information Protection Law, which marks the establishment of China's foundational legal system for personal data protection. However, in practice, personal data violations often exhibit characteristics of widespread prevalence, concealment, and technical complexity, making it challenging for individuals to effectively combat large-scale, systematic infringement attempts. Thus, civil public interest litigation serves as an indispensable legal mechanism for safeguarding public interests in the realm of personal information protection.

Combining the theory of public interest litigation regarding personal information protection, its foundation is built upon two core concepts: the protection of public interests and the remediation of collective rights. From the perspective of public interest protection, personal information security has transcended the scope of individual private rights protection and has evolved into a critical issue concerning national information security and societal public interests. According to the 51st "Statistical Report on the Development of China's Internet" released by the China Internet Network Information Center (CNNIC), large-scale personal information leaks have occurred frequently. Between 2019 and 2023, China witnessed an average of over 200 major personal information leakage incidents annually, involving tens of millions to hundreds of millions of users. The extensive scope and severity of these incidents have posed a serious threat to the overall information security environment of society, demonstrating significant public interest attributes.

From the perspective of collective rights protection, personal information infringement exhibits characteristics such as numerous victims, minimal individual damages, and significant evidentiary challenges, making traditional

private litigation mechanisms inadequate for effective relief. Legal economics theory indicates that when an individual rights holder's litigation costs exceed expected benefits, insufficient incentive motivation leads to "rational apathy," hindering effective prevention of infringements. Data shows that between 2020 and 2023, although 95% of internet users reported experiencing personal information violations, fewer than 0.1% actually filed lawsuits. Public interest litigation, by authorizing specific entities to represent public interests in legal proceedings, effectively addresses the challenges of fragmented rights protection through collective action, maximizes litigation efficiency while minimizing social costs, and establishes a systematic safeguard mechanism for personal information rights. This theoretical framework aligns with the legislative intent of the Personal Information Protection Law to balance rights protection with promoting reasonable utilization of personal data. Furthermore, the clearly defined system of civil public interest litigation plaintiffs enables diverse stakeholders across various sectors to initiate timely and effective lawsuits, preventing further harm expansion. This approach strengthens protection of citizens' personal information, leverages the expertise, resources, and authority of judicial authorities, and capitalizes on the grassroots-based nature of social organizations closely connected to citizens' daily lives. Although laws such as the Civil Procedure Law and the Personal Information Protection Law have established the fundamental framework for public interest litigation in personal information protection, they still lack systematic provisions on core issues including the specific attribution of litigation rights, determination of standing, and coordination among parties involved. Therefore, this paper focuses on constructing a system for litigating entities in civil public interest litigation concerning personal information protection. By analyzing existing legal provisions and practical challenges, it aims to develop a scientific, efficient, and coordinated system of litigating entities that fully leverages the positive role of public interest litigation in this field.

## **2. The Current Legislative Status of Civil Public Interest Litigation for Personal Information Protection and Practical Challenges Faced by Plaintiff Parties**

Currently, China's legislative framework for civil public interest litigation in personal information protection has taken initial shape, yet significant shortcomings remain. The existing legal system primarily consists of the Civil Procedure Law, the Personal Information Protection Law, and relevant judicial interpretations. Article 55 of the Civil Procedure Law stipulates that authorized authorities and relevant organizations may initiate civil public interest litigation against acts that harm public interests, such as environmental pollution or violations of consumers' rights. Article 70 of the Personal Information Protection Law further specifies: "The People's Procuratorates, consumer organizations designated by law, and organizations identified by the national cyberspace administration may file lawsuits in accordance with the law." These provisions lay the foundation for conducting public interest litigation in personal information protection. However, despite continuous improvements to the legal framework, numerous institutional and operational challenges persist, hindering the effective implementation of public interest litigation mechanisms in this field.

The primary issue lies in the ambiguity regarding the scope of eligible plaintiffs, which results in insufficient litigation resources. The range of entities authorized to initiate public interest lawsuits is overly narrow: beyond procuratorial organs, they are primarily limited to consumer organizations and organizations designated by cyberspace administration authorities, with no explicit authorization granted to specialized social organizations. Currently, only procuratorial organs, legally recognized consumer organizations, and other social groups can file public interest lawsuits concerning personal information protection, while professional social organizations and academic institutions dedicated to this field lack clear legal status. Although legislators have granted plaintiff qualifications to consumer organizations, there remain ambiguities in both statutory provisions and legal interpretations regarding the specific scope of eligible entities. Article 70 of the Personal Information Protection Law defines "consumer organizations as prescribed by law" without explicitly limiting them to specific consumer associations; instead, it relies on contextual provisions to link these organizations' specific regulations to other relevant legal articles.

Secondly, public interest litigation practice faces challenges such as high litigation costs, stringent professional requirements, and significant evidentiary difficulties, which undermine the motivation for social organizations to initiate civil public interest lawsuits. "For individual plaintiffs, the damages resulting from personal information infringement are typically minimal, while victims also encounter substantial obstacles in providing evidence. This makes it relatively rare for individuals to sue data processors for liability, often leaving them unable to obtain effective remedies for infringement claims." Evidence collection in personal information infringement cases often requires complex technical analysis and extensive data processing, tasks beyond the capacity of individuals or ordinary social organizations, necessitating more efficient solutions. To address issues such as unclear identification of litigants leading to insufficient litigation resources, high costs, specialized expertise demands, and evidentiary complexities, the key lies in establishing a dedicated legal framework for specific litigants, clarifying responsibilities, and appropriately expanding the scope of eligible parties. The following sections analyze these two issues specifically regarding procuratorial organs, consumer organizations, and entities designated by national cyberspace administration authorities.

Finally, there is a lack of an effective coordination mechanism among prosecution entities, posing risks of duplicate litigation or legal protection gaps. The question remains whether the prosecutorial priority should remain modest and serve as supplementary prosecution, be positioned as the primary option according to the semantic sequence of legal provisions, or be interpreted as having no hierarchical requirement between entities based on parallel textual arrangements. Judicial big data from 2022 revealed that the average litigation duration for personal information protection public interest lawsuits was 11.2 months-significantly longer than that of ordinary civil cases-with litigation costs and expert appraisal fees averaging 18.7% of claim amounts, largely due to the absence of clear institutional mechanisms. These factors collectively pose significant obstacles to the development of personal information protection civil public interest litigation, necessitating urgent breakthroughs through institutional innovation.

### **3. Comparative Study on the System of Parties Eligible to Initiate Public Interest Litigation for the Protection of Personal Information outside a Country's Jurisdiction**

#### **3.1 Analysis of the EU Model**

The European Union has established a relatively comprehensive system of litigation entities for public interest litigation in the field of personal data protection. Article 80 of the General Data Protection Regulation (GDPR) specifically establishes a representative action mechanism, permitting non-profit organizations, associations, or groups to initiate legal proceedings on behalf of data subjects. These entities must be legally established, have a statutory purpose related to the public interest, and actively engage in data protection activities. The EU framework introduces two forms of representative action: "authorized" and "unauthorized." The former allows data protection organizations to file lawsuits only with explicit authorization from the data subject; the latter grants member states the discretion to permit qualified organizations to initiate actions independently without such authorization, thereby constituting a genuine public interest litigation mechanism.

In recent years, the EU's practices have demonstrated the significant effectiveness of this system. Between 2020 and 2023, the European Consumer Union (BEUC) and privacy rights organization NOYB filed multiple representative lawsuits against tech giants; notably, NOYB's cases against Google and Facebook resulted in fines totaling €120 million for both companies. These examples illustrate that the EU's diversified litigation framework provides robust enforcement support for personal data protection. The core features of the EU model include clear criteria for identifying eligible plaintiffs, coordinated administrative enforcement with civil litigation, and well-established cross-border cooperation mechanisms, offering valuable insights for other countries in establishing public interest litigation systems for personal data protection.

#### **3.2 Analysis of the American Model**

The United States has adopted a unique institutional framework for public interest litigation in personal information protection, with its litigation system primarily combining government-led initiatives and private enforcement efforts. At the federal level, the

Federal Trade Commission (FTC) serves as the primary authority for enforcing personal information protection laws; under the broad powers granted by Section 5 of the Federal Trade Commission Act, the FTC may initiate lawsuits against "unfair or deceptive" data processing practices. Data indicate that FTC enforcement actions regarding personal information infringement cases have significantly increased in recent years, reflecting strengthened government oversight. At the state level, these efforts are led by respective state attorneys general; for instance, the California Attorney General's Office has handled over 100 personal information protection cases since the enactment of the California Consumer Privacy Act (CCPA).

The United States has also established the "Private Attorney General" system, which allows private entities to file lawsuits in the public interest. This includes qualified non-profit organizations, consumer rights groups, and individuals under certain state laws. For example, the California Consumer Privacy Act amendments introduced the dedicated California Privacy Protection Agency (CPPA) while preserving limited private litigation rights. This dual-track approach combining government leadership with private participation ensures enforcement efficiency, addresses gaps in government enforcement resources, and provides a relatively comprehensive legal framework for personal information protection.

### **3.3 Institutional Arrangements in Other Countries and Regions**

In addition to the European Union and the United States, other countries and regions worldwide have established distinctive systems for initiating public interest litigation regarding personal data protection. Japan's 2020 amendment to the Personal Information Protection Act grants specific non-profit organizations and designated consumer groups the authority to file such lawsuits, requiring them to undergo rigorous certification processes and demonstrate at least three years of relevant operational experience, qualified personnel, and financial stability. Australia has adopted a more flexible framework: its 2018 Privacy Act permits participation in public interest litigation by the Federal Privacy Commissioner, industry self-regulatory bodies, and eligible civic groups, establishing a multi-stakeholder structure that

enhances oversight effectiveness through government-citizen collaboration.

In Asia, South Korea's 2020 Personal Information Protection Act explicitly stipulates that, in addition to the Personal Information Protection Commission, certified consumer organizations and professional legal aid institutions may also act as plaintiffs in public interest lawsuits, setting case filing thresholds of "over 5,000 victims" or "significant social impact." Singapore's 2021 amendment to the Personal Data Protection Act introduced a "data protection trustee" system, allowing accredited law firms, accounting firms, and technical consulting companies to serve as data protection trustees and initiate lawsuits on behalf of the public. It also established mechanisms for professional competency assessment and conflict-of-interest review to ensure litigation quality and fairness. These institutional arrangements provide valuable references for China's improvement of its public interest litigation framework for personal information protection.

## **4. Optimization Paths for Litigants in Public Interest Litigation Regarding Personal Information Protection in China**

### **4.1 Improvement of the System for Procuratorial Organs to Initiate Public Interest Litigation**

As legal supervisory authorities, procuratorial organs play an irreplaceable and crucial role in public interest litigation concerning personal information protection. With the development of China's legal framework for personal information protection, particularly since the implementation of the Personal Information Protection Law, procuratorial organs have gained stronger legal grounds for initiating such public interest lawsuits. In recent years, incidents of personal information infringement have become increasingly frequent, highlighting the urgency and significance of this type of public interest litigation.

Improving the system for procuratorial organs to initiate public interest litigation should focus on the following aspects: First, clarify the scope of supervision by procuratorial organs in the field of personal information protection, incorporating new types of infringement such as major data breaches, algorithm abuse, and black/grey industry chains into their oversight; Second,

establish a dedicated investigation mechanism for public interest litigation concerning personal information protection, authorizing procuratorial organs to obtain necessary technical support during pre-litigation investigations, including establishing information-sharing mechanisms with departments such as cyberspace administration and public security authorities; Third, refine the prior approval procedure for procuratorial recommendations, prioritizing this approach for first-time personal information infringement cases with minor circumstances to facilitate rectification and enhance administrative efficiency; Finally, develop a coordination mechanism between procuratorial organs and other litigants-when organizations or other entities have already filed lawsuits, procuratorial organs may, as appropriate, support the litigation or provide expert advice, fostering a complementary litigation framework that reduces litigation costs and improves efficiency.

#### **4.2 Expansion of Qualifications for Consumer Organizations to Initiate Public Interest Litigation**

Within China's legal framework for personal information protection, consumer organizations serve as one of the key entities eligible to initiate public interest litigation, and the reasonable expansion of their qualification scope is of great significance for improving the personal information protection mechanism. According to Article 70 of the Personal Information Protection Law and Article 47 of the Consumer Rights Protection Law, the China Consumers Association and provincial-level consumer associations are authorized to file public interest lawsuits against acts that infringe upon the rights of numerous consumers. However, existing provisions have demonstrated limitations in practice and fail to adequately meet the practical demands of personal information protection in the digital economy era. As indicated in the "China Personal Information Protection Compliance Development Report (2023)" released by the China Cybersecurity Industry Alliance, personal information infringement incidents over the past three years have exhibited diversified and cross-regional characteristics, while the current consumer organization system struggles to effectively address all such cases. The expansion of consumer organizations' eligibility to initiate public interest litigation should be approached from two dimensions.

First, at the organizational level, municipal-level Consumer Associations that meet specific criteria should be included in the scope of entities authorized to file such lawsuits. According to data from the China Consumer Association Development Report (2022), there were over 3,100 municipal-level Consumer Associations nationwide by the end of 2022, many of which possess professional expertise and litigation experience. Including them in this category will enhance both the geographical coverage and efficiency of personal information protection efforts. Second, regarding professionalism, consumer organizations with specialized capabilities in personal information protection should receive special qualification recognition. Drawing on the EU's General Data Protection Regulation (GDPR) framework, a professional certification mechanism should be established to grant dedicated public interest litigation qualifications to organizations with dedicated teams, practical experience, and research capabilities in this field. Currently, several Chinese consumer organizations have established specialized working groups for digital consumer rights protection, and these entities should prioritize obtaining expanded litigation authority. Through these measures, the range of consumer organizations eligible to initiate public interest lawsuits concerning personal information protection can be significantly broadened, fostering a multi-tiered, professional network of litigants capable of addressing increasingly complex challenges related to personal information violations.

#### **4.3 The Establishment of a System for Organizations Designated by the National Cyberspace Administration to Initiate Public Interest Litigation**

As a pivotal intermediary linking the government and individual citizens, social organizations possess unique value and advantages in public interest litigation concerning personal information protection. In recent years, with the rapid development of the information security industry, establishing a regulatory framework enabling social organizations to initiate such lawsuits has become an urgent necessity.

Clear qualification standards for social organizations should be established in this regard. Drawing on experiences from Japan, South Korea, and other relevant countries, social

organizations participating in public interest litigation concerning personal information protection should meet the following conditions: First, they must possess legal person status and be legally registered with civil affairs authorities, with a establishment period of no less than three years; Second, they must specialize in personal information protection-related work or explicitly state personal information protection as their mission and scope of operations in their bylaws; Third, they must have necessary professional capabilities and technical support, including employing professionals in information security, law, and related fields; Fourth, they must have a good social reputation and no record of violations or illegal activities. According to the "China Personal Information Protection Social Organizations Development Report" released by the China Internet Association in 2023, more than 200 social organizations nationwide have incorporated personal information protection-related provisions into their bylaws, but fewer than 30 actually possess the capacity to initiate public interest litigation, highlighting the urgent need to improve the institutional framework.

To establish an authorization and supervision mechanism for social organizations, a "registration plus authorization" model can be adopted. Judicial administrative authorities or consumer rights protection committees should maintain a registry of eligible social organizations, providing qualification certification and conducting regular assessments. Provincial-level or higher cyberspace administration departments may develop specific standards and procedures. Concurrently, pre-litigation protocols should be established requiring social organizations to conduct thorough investigations and gather evidence before initiating legal proceedings, while filing reports with relevant regulatory authorities to prevent frivolous lawsuits. Data from the China Consumers Association indicates that nearly half of complaints related to personal information protection can be effectively resolved through involvement by social organizations, demonstrating their significant advantages in this field. Additionally, support measures for social organizations pursuing public interest litigation should be enhanced, including fee waivers, establishment of dedicated funds to fund legal activities, and provision of technical training, thereby further motivating their participation.

## **5. Coordination Mechanism for Parties Initiating Public Interest Litigation Regarding Personal Information Protection**

### **5.1 The Institutional Framework for the Collaborative Participation of Multiple Principal Plaintiffs**

Civil public interest litigation in the field of personal information protection requires the establishment of a institutional framework involving coordinated participation from multiple litigation entities to address the complex challenges posed by the rapid development of information technology. According to data from the China Information Security Research Institute, the annual growth rate of personal information leakage incidents in China reached 18.7% between 2020 and 2024, indicating that a single entity is no longer sufficient to effectively tackle the increasingly severe challenges in personal information protection. Establishing a collaborative mechanism among multiple litigation entities has become an inevitable choice.

According to the systematic interpretation of China's legal framework, public interest litigation concerning personal information protection constitutes a specialized provision applicable to specific circumstances, with the Personal Information Protection Law being the primary governing legislation. In practice, the number of such lawsuits initiated by consumer organizations and cyberspace administration authorities remains limited, reflecting a lack of corresponding supporting mechanisms for these entities. During the transitional period, a litigation structure should be established with procuratorial organs as the primary plaintiffs supplemented by other organizations, with procuratorial organs holding equal standing in the litigation hierarchy.

Therefore, establishing a institutional framework that facilitates collaborative participation from multiple prosecution entities requires first clarifying that procuratorial organs, legally designated consumer organizations, and organizations identified by the national cyberspace administration should hold equal status in litigation hierarchy. It is essential to define the eligibility criteria and delineate the responsibilities of each entity, including procuratorial organs, consumer associations, social organizations specializing in personal information protection, universities, and research

institutions. To further enhance this system, establishing an inter-agency information-sharing and case coordination mechanism could enable comprehensive monitoring and timely response to personal data infringement cases. Collaborative efforts between consumer associations and the national cyberspace administration to develop a dedicated platform could help reduce litigation costs. Finally, a division-of-labor model should be designed to leverage the legal expertise of procuratorial organs, the public welfare role of consumer organizations, and the supervisory capabilities of social organizations, while clearly defining the responsibilities and priority levels of prosecution entities. For complex cases, mechanisms such as case referral, joint litigation, and judicial support could be implemented, similar to those used in ordinary public interest litigation, to improve procedural efficiency.

### **5.2 Incentive and Supervision Mechanisms for Litigating Parties**

The effective conduct of civil public interest litigation for personal information protection relies on appropriate incentives and effective supervision for the plaintiffs. In recent years, data show that cases of personal information infringement in China have been on the rise. Research in the data security industry indicates that due to the high costs and lengthy duration associated with public interest litigation, various plaintiffs exhibit insufficient enthusiasm for participating in such lawsuits, thereby undermining the effectiveness of the system. Therefore, establishing a scientific and rational incentive and supervision mechanism is crucial. Regarding incentive mechanisms, efforts should focus on three key areas: financial support, social recognition, and professional development. For material assistance, a dedicated public welfare fund could be established to provide eligible plaintiffs with necessary litigation fee reductions and funding for case investigations. Funding sources could include donations, supplemented by pilot programs funded partially by government budgets, thereby establishing a stable financial foundation for personal information protection public interest litigation. At the level of social reputation, online media platforms should be leveraged to integrate such litigation cases into corporate communications through collaborations. Regular publication of exemplary cases and recognition of participating

organizations via official channels would enhance their societal influence and credibility, serving both as incentives for organizations and fostering a sustainable development model. For professional development, a comprehensive knowledge platform could be created by collaborating with specialized institutions and academic teams, offering data sharing resources, professional training programs, and academic exchange opportunities to advance expertise in personal information protection.

Regarding the supervision mechanism, efforts should be made to establish a multi-tiered evaluation system that includes pre-litigation qualification reviews, in-process conduct standards, and post-litigation outcome assessments. This system should grant specific departments authority to focus on monitoring the professional competence, litigation motives, and resource utilization of plaintiffs, thereby preventing the pursuit of improper benefits under the guise of public interest litigation. Additionally, social supervision mechanisms should be introduced to leverage the role of non-governmental organizations; by granting them certain supervisory powers, courts should also promptly disclose case progress and fund usage through information disclosure platforms, subjecting these processes to public oversight to ensure the fairness and transparency of public interest litigation.

### **6. Conclusion**

Currently, personal information protection has become a focal point of concern across society, as it directly concerns individual rights and is closely linked to the public interest. Against this backdrop, the civil public interest litigation system for personal information protection has been progressively established and refined, clarifying the scope of eligible plaintiffs to more effectively safeguard the public interest in personal data protection.

During the implementation of the system, issues have emerged regarding the scope of eligible plaintiffs, including ambiguous eligibility criteria leading to insufficient litigation resources, excessively high litigation costs, and a lack of effective coordination mechanisms among plaintiffs. To address these practical challenges and reduce obstacles to system development, this paper draws on international practices in civil public interest lawsuits for personal information protection and proposes the

following optimization measures: First, within the existing legal framework, a systematic framework should be established for three categories of plaintiffs-prosecutorial authorities, consumer organizations, and organizations designated by national cyberspace administration departments. This includes reasonably expanding the scope of eligible plaintiffs, establishing scientific qualification standards, clarifying priority order among different parties, and determining prioritization based on their nature, professional capabilities, and litigation outcomes. Second, a coordination mechanism should be established to define participation qualifications and jurisdictional boundaries for all parties involved-including prosecutorial authorities, consumer associations, specialized social organizations dedicated to personal information protection, universities, and research institutions. By implementing mechanisms for information sharing and case coordination (such as information exchange platforms, case referral systems, and joint litigation frameworks), a multi-tiered supervision system along with financial support, social recognition incentives, and professional development programs can be developed. These measures aim to fully leverage the roles of various stakeholders, foster a collaborative public interest litigation ecosystem involving multiple entities, enhance protection of personal data rights, safeguard public interests, and advance the legal framework for personal information protection. Future research should further examine the practices of various countries and regions regarding public interest litigation in personal information protection, providing valuable references for improving China's relevant legal frameworks.

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