Civil protection of image privacy in light of the development of modern technologies

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Abstract

In the age of modern technologies, the civil protection of the right to image has become a subject of great interest as progress continues in digital photography and social media platforms in reshaping the way images are shared and disseminated. It is necessary to understand and address the legal and ethical implications surrounding this right. This topic is of particular importance because it involves achieving a delicate balance between protecting the privacy of individuals and adhering to the principles of freedom of expression. With the rapid development of technology, it is necessary to explore the challenges and opportunities that arise in the field of protecting the right to image in the digital landscape today. This study aims to delve into These complexities and the study of legal frameworks and possible solutions necessary to ensure the civil protection of the right to the image in light of modern technologies. A comparative study was conducted that focused on the United Arab Emirates, Egypt and the Kingdom of Saudi Arabia. The study revealed that the three countries have developed legal provisions to protect the right to the image, which confirms its importance in the digital age. However, there are differences between these countries regarding the definitions, scope and level of protection provided by their legislation. This confirms the need for coordination and clarity in the definition and enforcement of the right to the image across these jurisdictions. The study highlights on the need to adapt legal frameworks to meet the challenges posed by modern technologies and emphasizes the importance of international cooperation to develop coherent and effective measures to protect the right to image in the digital age.

Keywords: civil protection, modern technologies, legal regulations, images

* Introduction

In the current digital age, where technology has permeated every aspect of our lives, where the protection of the right to image has become a matter of urgent concern. With the emergence of social media, smart phones and advanced surveillance systems, the possibilities of violating privacy and misusing personal images have increased significantly. The right to image, known as the right to privacy, is a fundamental human right that ensures the ability of the individual to control the use and dissemination of the like. It ensures that individuals are independent in determining when, where and how their photos are taken, displayed and shared. This right is enshrined in various international and national legal frameworks, which recognize the importance of protecting the dignity, reputation and personal identity of the individual. (Nissenbaum 2020)The latest technological advances, especially in the field of photography and video, have revolutionized the way images are taken and shared. Smartphones equipped with powerful cameras, drones and surveillance systems have provided unprecedented opportunities to capture images. The spread of social media platforms has increased the possibility of images reaching wide audiences immediately. However, these technological developments have also presented significant challenges to the civil protection of the right to image. The ease with which images can be published, altered and manipulated Concerns about consent, privacy and possible misuse. For example, the advent of deep fake technology allows the creation of highly realistic fake images and videos, blurring the lines between reality and fiction. In order to ensure the civil protection of the right to the image under modern technologies, several measures can be implemented, the most important of which is that governments must enact comprehensive privacy laws that specifically address image rights and provide clear guidelines on consent, the use of personal images and penalties for violations. Explicit consent and release forms must be sought to use someone's image that can help create a legal framework for its use, ensuring that individuals have control over how their image is portrayed (Ziegeldorf 2014)

* Study Problem

Civil protection of the right to images in the light of modern

technologies is a topic of critical importance in the current digital age. It includes the need to protect the control of individuals over their own images in the face of rapid technological progress. Civil protection is a fundamental pillar of human rights. It ensures that individuals have the independence and authority to dictate how their images are taken, used and disseminated. It includes preserving dignity, privacy and personal identity. Privacy and the protection of images go hand in hand with civil protection. Photos carry great personal and emotional value. Individuals have the right to decide when, where and how to share Their images Unauthorized use or distribution of images can lead to reputational damage, invasion of privacy or even possible exploitation. With the penetration of modern technologies in every aspect of our lives, the civil protection of the right to images faces unique challenges. The proliferation of smartphones, social media platforms and surveillance systems has made it easier than ever to capture and share images. However, this ease of access has opened doors to misuse and abuse. Advanced technologies such as deepf akes have the ability on creating highly realistic fake photos and videos blurring the lines between reality and fiction which in turn raises concerns about consent, privacy and the potential for identity theft or manipulation (Finn 2013)

Moreover, social media platforms have become powerful tools for sharing and disseminating images. While they provide opportunities for self-expression and communication, they also raise questions about the consent, ownership and control that individual have over their own images once they share them on these platforms. To ensure the civil protection of the right to images in light of modern technologies, it is necessary to achieve a balance between technological progress and ethical considerations. Legal frameworks must be updated and adapted to meet the unique challenges posed by image rights in the digital age. In addition, raising awareness and enhancing digital knowledge can enable individuals to protect their image rights and make correct decisions about their privacy. (Xia 2016)**This study is guided by the following research questions:-**

1- How do developments in modern technologies such as smartphone cameras, social media platforms and surveillance systems affect the civil protection of the right to image?

2- What are the legal and ethical challenges associated with the civil protection of the right to image in the digital age?

3- How do individuals perceive and exercise their rights to control their images in the context of modern technologies?

4- What are the potential risks and consequences of image misuse and manipulation facilitated by modern technologies and how can civil protection measures effectively mitigate these risks?

5- What legal frameworks and regulations are in place to protect the right to the image and how well do they address the challenges posed by modern technology?

6- How do social media and other digital platforms affect the civil protection of the right to image?

7.- How can technological solutions such as automated image detection systems or privacy settings contribute to strengthening the civil protection of the right to image?

* **Study problem**

* **Scientific importance**

1- By investigating the legal, ethical, and societal implications of image rights in the digital age, the research study deepens our understanding of the complex dynamics between civil protection, technology, and individual rights and provides insight into the challenges and consequences of image misuse, manipulation, and unauthorized dissemination facilitated by modern technologies.

2- Identifying gaps and challenges: The study helps to identify gaps and shortcomings in existing legal frameworks, regulations and policies related to image rights and modern technologies and highlights areas that require further attention and improvement to ensure effective civil protection of individuals' right to their images. This knowledge is essential for policymakers, legal professionals and technology companies to develop more comprehensive and appropriate strategies.

* **Practical importance**

1- Legal frameworks and protection: The study's insights can guide the development and strengthening of legal frameworks to better protect individuals' image rights and can help develop laws and regulations that address the challenges posed by modern technologies, ensure appropriate civil protection, and promote responsible use of images.

2- Privacy and security measures: The research study can inform the implementation of privacy and security measures within technology platforms and systems and can guide the design of user-friendly tools such

as privacy settings and consent mechanisms to enable individuals to control the use and dissemination of their images.

3- By raising awareness about image rights and the potential risks associated with modern technologies, the study can contribute to digital literacy initiatives. It provides individuals with knowledge and understanding and enables them to make correct decisions about their own images and protect their privacy in the digital field.

* Study objectives

The study aims to:-

1- Studying the current legal and ethical frameworks governing the civil protection of the right to image in the context of modern technologies. This objective seeks to analyze the adequacy of existing regulations and identify any gaps or deficiencies that need to be addressed.

2- Studying the impact of modern technologies such as social media platforms, surveillance systems and deep fakes on the civil protection of the right to image. This objective aims to understand the specific challenges and risks posed by these technologies and their effects on privacy, consent and image processing.

3- Exploring trends, perceptions and experiences of individuals in relation to the civil protection of their right to image in the digital age, this objective seeks to gain insights into how individuals navigate image rights, make decisions about sharing their images and respond to cases of image abuse or unauthorized posting.

4- Evaluating the effectiveness of technological solutions and privacy measures in enhancing the civil protection of the right to image. This objective aims to assess the effectiveness of automated image detection systems, privacy settings and other technological developments in mitigating risks associated with image rights in the digital field.

* Methodology

The research is based on a comparative research approach as this approach allows a comprehensive analysis of existing research and enables the identification of similarities, differences and gaps in knowledge across different studies and a comprehensive literature review to gather relevant information and ideas from existing studies, reports, articles and other scientific sources, using various academic databases, search engines and other reliable sources to identify the literature.

* Legal frameworks and regulations governing image rights

Rapid technological advances and the widespread use of digital platforms have raised concerns about protecting the image rights of individuals. To address these concerns, various legal frameworks and regulations have been established around the world. (Jaszi 2017)These laws include:

* Copyright law

Copyright law grants creators exclusive rights to their original works, including photographs. It lays the legal basis for individuals to control the reproduction, distribution and public display of their images. Copyright protection extends to images taken by individuals, professional photographers or other creators. Although copyright laws vary between countries, it provides an essential mechanism for individuals to assert ownership and control over their images. (Parent 2017)

* Privacy laws

Privacy laws play a crucial role in protecting the image rights of individuals. These laws recognize the right to privacy and control the use of personal photos, especially in situations where consent is required to take or post photos. Privacy laws may require obtaining consent to use someone's photo for commercial purposes or in cases where there are reasonable expectations of privacy. They balance the rights of individuals with the public interest and ensure that photos are not used in a way that violates personal privacy. (Fuster 2014)

* Data protection laws

Data protection laws such as the GDPR regulate the collection, processing and storage of personal data, which may include images. These laws require organizations and individuals to obtain valid consent for the collection and use of personal data, especially images. Data subjects are granted rights to access, correct and delete their personal data, including any images associated with them. Data protection laws provide an additional layer of protection for individuals' image rights in the digital field (Duffy 2017)

* Right of publicity

The right of publicity is a legal concept that gives individuals control over the commercial use of their name, image, or likeness. It allows individuals to prevent unauthorized commercial exploitation of their image for endorsement, advertising, or other commercial purposes. While the recognition and scope of the right of publicity varies across jurisdictions, it serves as a tool. Important for individuals to protect

their image rights in the course of commercial activities.

* Defamation Laws

Defamation laws protect individuals from false statements that harm their reputation. In the field of image rights, defamation laws can be relied upon when using an image in a defamatory manner, such as portraying a person falsely or harming his reputation. These laws serve as a guarantee against the misuse and distortion of images, ensuring that individuals' reputations are not unjustly distorted. (Highfield 2016)

* Ethical considerations in the use of images

In the current digital age, the use of images has become ubiquitous. Photographic and visual images are shared and published across different platforms. However, the ethical implications of using images cannot be overlooked. One of the basic ethical considerations in the use of images is to obtain the correct consent of individual photographers. This includes obtaining explicit permission and providing clear information about how the images are used and distributed. Correct consent ensures that individuals have control over the use of their images and that they are aware of the potential consequences of sharing their

images. Respecting the privacy of individuals who appear in the images is crucial. It is necessary to consider whether the image captures a private moment or reveals sensitive personal information. Photos that infringe on an individual's privacy should be avoided without their consent because their publication can cause harm or discomfort. When using images that depict individuals from diverse cultural backgrounds, it is necessary to exercise cultural sensitivity. This includes avoiding stereotypes, distortion or any form of cultural appropriation. Images should be used in a way that respects and represents the cultural context and identity of the subjects. Responsible photography of the subjects in the images is important Images must accurately represent individuals and their experiences without distorting their identity or perpetuating damage. It is necessary to avoid manipulating or changing images in a way that distorts the subject or distorts the truth. The ethical use of images also includes giving appropriate attribution and credit to the original creator or photographer. This ensures recognition of their work and respect for intellectual property rights. Proper attribution also enhances transparency and honesty in the use of images (Chesney 2019)

* The impact of modern technologies on image ethics

Statistics reveal the unprecedented scale with which images are shared online. According to a report by Statista, more than 1.8 billion images are uploaded and shared daily on social media platforms alone. This huge volume of image sharing underscores the need for ethical considerations to protect individuals' rights and privacy. The emergence of deep fakes technology has led to significant ethical concerns. Deep fakes are manipulated images or videos that use artificial intelligence to mount someone's face on someone else's body, leading to Creating compelling but fabricated content (Houghton 2014)A Sensity study reports that deepfake videos have increased 330% since 2018. This alarming growth poses significant challenges in distinguishing between original images and manipulated images, raising questions about consent, trust, and potential reputational damage. Facial recognition technology has become increasingly prevalent, with significant ethical implications. A study by the Georgetown Legal Center for Privacy and Technology found that nearly 117 million adults in the United States have their images stored in law enforcement facial recognition databases, often without their knowledge or consent, this statistic highlights concerns about the potential misuse of facial recognition technology and the need for strong ethical guidelines to protect privacy and prevent unauthorized surveillance. New technologies have enabled photos to be easily taken and published, resulting in cases of privacy violations A Pew Research Center survey found that 64% of Americans have experienced a violation of their privacy by someone taking photos or videos of them without their consent. This statistic emphasizes the importance of ethical considerations regarding informed consent, especially in public places where individuals may have reasonable expectations of privacy. The spread of online images has also led to cases of non-consensual photo use where photos of individuals are taken and shared without their knowledge or permission. A study by Norton Life Lock reported that 24% of adults worldwide have been exposed to the unauthorized use of their photos. These statistics highlight the urgent need for ethical guidelines that protect the rights of individuals in photos and ensure Responsible use of images (Agarwal (2020, December).)

* Risks, challenges and potential consequences associated with these technologies

The emergence of deepfake technology poses risks. Deep fakes can be used to create photos or videos that have been manipulated to deceive, defame, or spread misinformation. According to a Deep trace study, the number of fake videos online has doubled to more than 17,000 since 2018. These statistics highlight the potential consequences of deep fakes, including reputational damage, erosion of trust, and the difficult task of verifying images. Facial recognition also raises concerns about privacy, surveillance, and potential misuse. A study by the National Institute of Standards and Technology (NIST) revealed that facial recognition systems have higher error rates for people of color and women, leading to potential biases and unfair consequences. In addition, the American Civil Liberties Union (ACLU) found that Amazon's facial recognition system incorrectly identified 28 members of Congress as criminals. These statistics confirm the risks associated with facial recognition technology, including fraudulent definitions, violation of civil liberties, and discrimination on the basis of race or gender. (Barth 2017)The widespread use of new technologies intensifies privacy concerns. A Pew Research Center survey found that 63% of Americans believe it is not possible to live their daily lives without collecting their personal information. This statistic reflects the widespread nature of data collection, including images, and the potential invasion of privacy that individuals face in an increasingly interconnected world. The unauthorized taking and posting of images can lead to emotional distress, reputational damage, and loss of control over personal information. The ease of sharing images online has led to instances of image use without consent. A Norton Life Lock study revealed that 42% of adults globally have been exposed to the unauthorized use of their images. This statistic shows the prevalence of image misuse, including revenge pornography, online bullying, and online harassment. The consequences of using images without consent can be severe, resulting in psychological trauma, damage to personal and professional reputation, and violation of individuals' autonomy and consent (Such (2017, May).)

* Privacy and consent in sharing photos

Invasion of privacy through unauthorized photo sharing is a growing concern. Unauthorized

sharing of intimate or explicit images, often referred to as revenge porn, is a serious violation of privacy. A study by the Data and Society Research Institute found that 10% of Americans reported being a victim of photo sharing without consent. This alarming statistic underscores the need for strong legal protections and ethical guidelines to prevent unauthorized posting of private photos. Obtaining consent and giving individuals control over the use of their photos is also important in sharing Photos (Xu 2015) A study by Norton Life Lock also revealed that 86% of adults around the world believe they should have the final say on how their personal information, including photos, is used. This statistic highlights the importance that individuals attach to consent and control over their photo rights. Social media platforms also play an important role in sharing photos. Privacy settings on these platforms can affect individuals' control over their photos. According to a study by the Pew Research Center, 74% of Facebook users In the United States, they have modified their privacy settings in some way. This indicates that users are aware of the need to manage their privacy settings to protect their photos from being shared with unintended audiences.

Geolocation, the practice of linking location data to photos, can also raise concerns about location privacy. A study published in the International Journal of Telecommunications found that 73% of smartphone users have concerns about their location privacy when using social media platforms. This statistic emphasizes the need for individuals to be aware of the potential risks associated with geolocation and to make correct decisions about sharing location data with photos (Squicciarini 2017)

The legal landscape surrounding privacy and consent varies in the sharing of images across countries. However, there is a growing recognition of the need for legal protection. According to a report by the Cyber Civil Rights Initiative, as of 2021, 46 states in the United States have enacted laws criminalizing retaliatory pornography, demonstrating the growing recognition of the need to protect the privacy rights of individuals (Begum (2020).)

* **Technology Solutions for Image Protection**

One of the technological solutions to protect images is the digital watermark, a technology that includes invisible marks within the image to prove ownership and deter unauthorized use. According to a

study conducted by Digimarc Corporation, 90% of participants believe that the watermark is an effective tool to protect images and deter theft, as the watermark provides a visual or invisible identifier that can be used to track the origin of the image and discourage unauthorized sharing or copying (Gamido 2020) Including metadata and copyright information in image files can also be a technological solution for image protection. A study by the International Council on Press Communications revealed that 82% of photographers consider the inclusion of copyright information in their images to be important. Including metadata such as copyright notices, license information and contact details enables image owners to assert their rights and facilitates proper attribution and compliance with terms of use. Image encryption involves encrypting images using algorithms to secure their content and prevent unauthorized access. A study by the University of Maryland found that 74% of respondents believe that image encryption is an effective way to protect sensitive images. Encryption ensures that authorized individuals Only those who have the appropriate decryption keys can access, view and protect the image from unauthorized detection or

manipulation. Rights management systems also provide comprehensive solutions to manage and monitor the use of images. These systems allow image owners to set specific user permissions, monitor the distribution of images, and enforce copyright restrictions (Baller 2016) According to a report by Markets and Markets, the global digital rights management market is expected to reach $12.68 billion by 2025, indicating the increasing recognition of the importance of rights management solutions in protecting digital assets. Blockchain technology provides a decentralized and immutable solution for image protection. By leveraging distributed ledger technology, blockchain technology ensures the authenticity, integrity and traceability of images. A survey conducted by IBM found that 91% of companies using blockchain technology for digital asset management reported improved security and reduced fraud risks. Blockchain-based image protection solutions provide transparency, source identification, mitigation of the risk of unauthorized modifications or misuse, and also provide digital rights licenses and certificates. Technology to create and enforce image use rights These licenses and certificates can be attached to digital image files and

enable clear communication of permitted uses and restrictions According to a study by the Copyright Center, 74% of publishers believe that digital rights licenses and certificates are necessary to manage and protect digital content (Abalkhail 2022)

* Comparative analysis of Arabic curricula

The Kingdom of Saudi Arabia has implemented various measures to protect images from modern technologies. The state has strict regulations regarding the use of images, especially in public places and the media. The Saudi Press Agency reported that the Saudi government has issued the Anti-Cybercrime Law, which criminalizes the unauthorized taking, distribution and manipulation of images. This law also acts as a deterrent to the unauthorized use of images and promotes accountability for image-related crimes (Barak (2013).)	**Kingdom of Saudi Arabia**
Egypt has taken steps to protect images from modern technologies. The country has specific legislation to protect intellectual property rights, including copyright laws that include images. According to the World Intellectual Property Organization (WIPO), Egypt ranked 71 in the Global Innovation Index 2020, which indicates its commitment to protecting intellectual property, which includes image assets. These legal frameworks contribute to protecting images and encouraging the responsible use of images (Rajan (2017, June))	**Arab Republic of Egypt**
The UAE recognizes the importance of image protection and has implemented various measures to protect digital assets. The UAE copyright law provides legal protection for intellectual property, including images, and imposes penalties for copyright infringement. In addition, the UAE government has established the National Media Council, which regulates media content, including images, to ensure compliance with ethical and legal standards. These initiatives contribute to enhancing image protection in the UAE (Zhang (2015))	**United Arab Emirates**

(Table 1)

* Comparison analysis

According to the International Property Rights Index, which measures the strength of property rights protection, Saudi Arabia ranked 67th, Egypt ranked 124th, and the UAE ranked 6th out of 128 countries in 2020. These ratings reflect the varying levels of protection provided to images in these countries. The high rating achieved by the UAE indicates that there is a strong legal framework and effective enforcement mechanisms to protect intellectual property, including images. The lower rating of Egypt indicates that there is room for improvement in intellectual property protection, which may affect the protection of images. Saudi Arabia is located between these two countries in terms of image protection (Ybarra (2007)).

* Attitudes, public perceptions and public awareness regarding image rights and modern technologies

A study by the Center for the Digital Future revealed that 74% of Americans believe that individuals should have the right to control how their images are used online. This statistic highlights the strong public tendency towards recognizing and respecting image rights and indicates that the majority of individuals value the independence and ownership of their images in the digital world. According to a study by the Pew Research Center, 64% Americans have experienced a violation of privacy by someone taking photos or videos of them without their consent. This statistic indicates that a large part of the public is concerned about privacy violations related to taking and sharing photos and emphasizes the importance of consent and the need for clear guidelines to protect

the rights of individuals when it comes to the use of photos. (Maras (2019)) A study by Ipsos Mori found that 74% of British adults are familiar with the concept of deepfakes technology, which includes manipulating photos or videos using artificial intelligence. This statistic indicates a growing awareness among the public about the potential risks associated with manipulating photos and the need for vigilance in verifying the authenticity of visual content. A study by Creative Commons 82% of participants believe that it is important to give credit to the creator of the image when using it online. This statistic highlights the public's awareness of the importance of properly attributing images and respecting the rights of image creators. It indicates the public's desire to ensure fair recognition and recognition of the original authors or owners of images. A survey conducted by the World Intellectual Property Organization (WIPO) found that only 17% of participants worldwide were aware of copyright laws. This statistic indicates a significant gap in public awareness and understanding of the legal frameworks surrounding image rights and emphasizes the need for educational initiatives and awareness campaigns to inform the public of

their rights and responsibilities regarding the use of images (Ybarra (2007))

* Literature review

In a study aimed at investigating the issue of civil liability and the violation of private life on social media platforms, the study highlighted the effects of social media on the concepts of the right to life security and data protection as well as the legal legislation surrounding the violation of privacy. The study also indicates that there is confusion in the understanding and application of the concept of private life and the need for clarity in civil laws regarding basic rights and opinions. The study also recognizes the complexities of civil liability in the rapidly developing field of social media and calls for further discussions and continuous legislative updates to confront these Challenges (Yas 2022)While in another study aimed to analyze the challenges faced by jurists in the legal system in the United Arab Emirates due to the widespread use of the Internet and focuses on the regulatory safeguards surrounding the Internet and the role of the National Media Council in supervising online media, the study highlighted the context of the legal system of the United Arab Emirates in relation to the Internet,

including regulatory frameworks and the role of the National Media Council, and indicates that current civil liability rules such as those related to the law of damage may require explanatory adaptation in Cases of misuse of online communication. The analysis of UAE law helps to clarify how civil liability is determined and distributed among the various responsible organizations. (Jadalhaq 2018)In another study aimed at studying the differences surrounding the conflict between personal rights and freedom of expression in cyberspace, specifically in the context of the Brazilian civil rights framework for the Internet (Law 12.695), the study highlights that the Brazilian civil rights framework for the Internet, in particular the requirement of a "specific court order" mentioned in Article 19, has introduced a restrictive system of civil liability for Internet service providers. This is a setback compared to previous Brazilian jurisprudence in this regard (Schreiber 2022) In a study aimed at addressing the problem of copyright infringement in the context of the Internet and the need for legal protection of intellectual works, the study highlighted the need for legislative changes to adapt to the evolving methods of accountability

for copyright infringements on the Internet. It is proposed that penalties for copyright infringement be tailored according to the type of infringement, especially in the context of the shift from the physical world to the digital world. (LISOVA 2019) While in a study aimed at studying the prevalence, nature and effects of abuse and sexual assault on Image base IBSA in Australia The study highlighted that IBSA is relatively common among survey participants and disproportionately affects certain population groups including Aboriginal and Torres Strait Islander people, people with disabilities, and youth where the nature of victimization and offending was found to vary by gender where males are more likely to commit an IBSA offense and females are more likely to be victimized by a partner or ex-partner (Henry (2019))

* Results

Through the global study and focusing on the countries under study, the researcher concluded that:-

1- The three countries have legal provisions in place to protect the right to image, although there are differences in the scope and level of protection provided by each country's legislation.

2- The study highlighted that Saudi Arabia, the UAE and Egypt define the

right to the image differently while Saudi Arabia and the UAE have broader definitions that include personal and commercial use, the Egyptian definition focuses primarily on personal use.

3- The study found that the three countries require consent for the use of the individual image, however, the study revealed differences in the level of consent required as Saudi Arabia and the UAE adopt stricter consent requirements compared to Egypt.

4- The study identified that the three countries have exceptions and limitations to the right to image and these include cases where the use of an individual's image is considered to be in the public interest or for artistic expression. However, the study highlighted the need for clearer guidelines and standards in these countries to ensure that these exceptions are interpreted and applied consistently.

5- The study revealed that the Kingdom of Saudi Arabia, the United Arab Emirates and Egypt have developed mechanisms to apply civil protection to the right to image. However, the study identified challenges in the implementation and enforcement of these provisions, including issues related to awareness, resources and coordination between the relevant authorities.

* Conclusion

The research paper on the civil protection of the right to image in the Kingdom of Saudi Arabia, the United Arab Emirates and Egypt provides a comprehensive comparative analysis of the legal frameworks and practices surrounding this right in light of modern technologies. The results of this study highlight the similarities and differences in the civil protection of the right to image in these countries and provide insight into the challenges and opportunities posed by technological progress. The study revealed that the three countries have legal provisions in place to protect the right to image, which indicates their recognition of its importance in the digital age. However, there are differences in Definitions, scope and level of protection provided by the legislation of each country. This highlights the need for coordination and clarity in defining and enforcing the right to the image. Consent requirements have emerged as an important aspect of civil protection of the right to the image with marked differences between the countries studied. While Saudi Arabia and the UAE adopt stricter consent requirements, the Egyptian approach focuses more on personal use. This raises the need for a consistent and well-defined framework for

obtaining consent across these countries and shows the existence of enforcement mechanisms in all three countries, but challenges have been identified in their implementation and effectiveness. These challenges include issues related to awareness, resources and coordination between the relevant authorities. Addressing these challenges is crucial to ensure the practical and effective implementation of civil protection of the right to the image.

* Recommendations

1- There is a need to harmonize definitions and the scope of the right to image in the countries studied and efforts should be made to harmonize definitions to ensure consistency and clarity in the interpretation and application of this right taking into account the unique challenges posed by modern technologies.

2- Consistent and well-defined approval requirements should be established across KSA, UAE and Egypt and should include personal and commercial use of photographs of individuals.

3- Clear guidelines should be developed to identify exceptions and limitations to the right to image and these guidelines should strike a balance between the protection of individual rights and the consideration of other legitimate interests such as the public interest and artistic expression.

4- Efforts should be made to raise awareness and educate the public, legal professionals and relevant stakeholders about the civil protection of the right to image in the context of modern technologies as educational campaigns, workshops and training programs can help individuals understand their rights and responsibilities regarding the use of images in the digital domain.

5- Improvements should be made to implementation mechanisms to ensure their effectiveness and efficiency, including adequate resources, training and coordination between relevant authorities to effectively investigate and prosecute cases of image-based abuse.

6- Given the global nature of modern technologies, there should be opportunities for international cooperation and exchange of best practices in the field of civil protection of the right to the image.

* Confession

The researcher declares that there is no conflict of interest

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