



# Right to Be Forgotten: How National Identity, Political Orientation, and Capitalist Ideology Structured a Trans-Atlantic Debate on Information Access and Control

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## Abstract

This study examines U.S. and British media coverage of the “right to be forgotten” in the light of their legal approaches and public attitudes toward privacy. Algorithmic and qualitative textual analysis techniques are combined to uncover the ideologies and interests that structure the discourse and shape its outcome. The analysis reveals that U.S. media, irrespective of their perceived “liberal” or “conservative” orientation, treat users’ online privacy as subservient to the business interests of technology companies—in line with the country’s lax legal approach. The coverage is more diverse in Britain, where the legal concept of privacy is also more stringent.

## Keywords

online privacy, personal data, Google, Facebook

Thirty-six words. That is the length of the article that changed the Internet, with its trillions of terabytes of information, for good—or for bad, depending on your point of view. It was published inconspicuously in 1998 in the Spanish newspaper *La Vanguardia*, announcing the auction of a property belonging to Mario Costeja González on account of unpaid social security debts. Eleven years later, González asked the newspaper to take

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it off from its website as the embarrassing issue had long been resolved and yet the article appeared prominently when his name was searched on Google. When the newspaper refused, he asked Google to scrub the link and the issue ended up in the European Court of Justice (ECJ). On May 13, 2014, the ECJ ruled that under European Union (EU) law, Google had to respect González's wishes and remove the link to the article. Moreover, the court obliged Google or any other "controller" of online data to remove links that were "inaccurate . . . inadequate, irrelevant or excessive in relation to the purposes of the [data] processing," if so requested ("Judgment of the Court," 2014, para. 92).

The ruling, in effect, recognized *le droit à l'oubli* or the "right to be forgotten" (RTBF), a legal concept based on "the fundamental need of an individual to determine the development of his [*sic*] life in an autonomous way, without being perpetually or periodically stigmatized as a consequence of a specific action performed in the past" (Mantelero, 2013, p. 230). RTBF is a key issue relating to information access and control in the age of Big Data, but it is also deeply contentious. It has been praised on one hand as a victory for privacy rights and panned on the other as a curb on free speech (Weber, 2015). Advocates have hailed it as a blow for data protection against corporate and government surveillance, but detractors have highlighted its potential to run technology companies aground and undermine the spirit of universal knowledge that invigorates the Internet (Tene & Polonetsky, 2012). RTBF is even viewed as driving a wedge across the Atlantic, pulling Europe and America apart (Rosen, 2012; Schwartz, 2013). This singular issue, by pitting legal philosophies, moral values, institutions, and even nations against one another, illustrates the multifarious debates surrounding emerging media technologies (see Weber, 2015). The way in which these issues are being negotiated is shaping the Internet itself and how it is run, as well as who benefits from it and who does not.

The news media, as one of the foremost purveyors of information online, as the site where public contestations on such issues take place, and as institutions that prospectively shape both the public and the policy agenda, are integral to this debate. As Mantelero (2013) observed, "[T]here exists a causal relationship between the development of mass media and the importance of ensuring a certain degree of protection of the privacy of personal life" (pp. 229-230). Understanding how the news media covered an issue like the RTBF is, therefore, vital for developing a better sense of (a) the many ideas and interests imbricated in such debates and (b) the relationships of power that undergird these debates and shape their outcomes. At the same time, examining news coverage of such contentious issues tells us something about journalism and news institutions too, and how political, economic, and ideational influences structure news discourses about them.

This study investigates the coverage of RTBF in U.S. and British news media to unravel the many overlapping threads of argumentation that gnarl this knotty debate and uncover the ideational and material interests their ends are tied to. It also juxtaposes news coverage with legal thinking and public attitudes toward privacy on either side of the Atlantic to better understand where journalism, itself wracked by the conflicting ideals of simultaneously being a public service profession and a private business interest, plights its troth to. In doing so, it contributes to the scholarship on sociology of news as

well as media and public policy. Methodologically, this study uses a combination of computer-assisted probabilistic content analysis and qualitative textual analysis that complement each other's strengths to provide robust results. This amalgamation of scale and depth is a useful way of studying large-volume digital corpora (see also Shahin, 2016).

## Legal Approaches to Privacy

Differences in attitudes toward privacy are central to the debate over RTBF. Legal scholars have long acknowledged that privacy is not a concept that can be defined in universally acceptable terms: Cultural values and beliefs shape how it is perceived and strongly influence local laws and regulations (Baumer, Earp, & Poindexter, 2004; Hofstede, 1991; Milberg, Smith, & Burke, 2000; Westin, 1967). Hughes (2015) suggested it was useful to think of privacy as "a claim to control personal information" by an individual and that it mattered essentially because "its misuse can cause unjustifiable harms" to the individual (p. 537). The key difference in cultural understandings of privacy thus lay in differences over what constituted justifiable harm to the individual in different societies.

Hughes (2015) identified two "irreconcilable" approaches to privacy law. *Dignitary privacy*, based on the notion of inviolable personality, is extremely stringent in delineating justifiable harms. In this approach, "[d]amage need not be proven; it is sufficient that privacy was violated for a person to have a right to a remedy." *Resource privacy*, however, takes a more utilitarian view and measures the harm to the individual, caused by the violation of his or her privacy, against the benefits to society as a whole. This approach "admits that in many cases, such as situations in which state security or freedom of expression are implicated, the interest of the competing claim will trump" (Hughes, 2015, p. 536). More harms to the individual are admissible under such an approach.

Apprehensions about technological invasions of privacy are as old as the concern with privacy itself. When American jurists Samuel D. Warren and Louis Brandeis wrote their influential article, *The Right to Privacy*, in 1890, arguing for "the right to be let alone," their fears about intrusions of privacy were spurred by the telegraph and the portable camera (Glancy, 1979). Those fears have grown manifold in the age of the Internet, social media, and Big Data (boyd & Crawford, 2012; Tene & Polonetsky, 2012).

Privacy laws are much sterner in Europe than the United States, including regulations regarding online and digital technologies (Baumer et al., 2004; Gurau, Ranchhod, & Gauzente, 2003; Schwartz, 2013; Weber, 2015). Schwartz's (2013) comprehensive historical analysis identified a number of Fair Information Practices (FIPs) that were emphasized more in Europe than the United States—as well as FIPs that simply did not exist in the United States. For example, "the United States does not rely on a notion that personal information cannot be processed in the absence of a legal authorization. Rather, it permits information collection and processing unless a law specifically forbids the activity" (Schwartz, 2013, p. 1976). Coupled with the fact that "U.S. law contains only limited, sector-specific protections for sensitive information" (Schwartz, 2013, p. 1978), it meant that Americans had very little control over their personal

information. Baumer et al. (2004) argued that the understanding of what constituted personal information was itself quite limited in U.S. law compared with Europe. The European approach to privacy can thus be described as *dignitary privacy* while U.S. law can be understood in terms of *resource privacy*.

## Public Perceptions of Privacy

The American public's attitudes toward privacy differ sharply with the letter and spirit of U.S. privacy regulations. A Pew Research Center (2015) survey found that 93% of Americans viewed being in control of who can get their personal information as important, including 74% who considered it "very important." Some 90% also viewed being in control of what information is being collected about them as important. However, half the country believed it had little or no control over the information being collected about them. Most Americans also wanted limits on how long data about them ought to be stored. More than 70% respondents said search engines should save their personal data for no more than a few months, and 65% said social media sites should do the same. These attitudes indicate Americans would be likely to support an RTBF-like law. Indeed, another survey found nine in 10 Americans were in favor of the United States instituting a law similar to RTBF (Benenson, 2015).

Europeans, too, are fearful about online privacy. A Eurobarometer (2011) poll showed that only 28% social media users and 18% online shoppers felt in complete control of their information. Some 70% Europeans said they were concerned companies would use their personal data for purposes other than what they had been collected for. Only one in three respondents said they trusted Internet service providers, while just one in five trusted search engines and social media sites. Crucially, 75% said they wanted to be able to delete personal information on a website when they wished to do so. These figures broadly mirror British attitudes. Nearly four in five British adults said they were concerned about online privacy, according to a March 2015 poll (ComRes, 2015). Half the respondents said consumers were being harmed by big companies collecting their personal data, against just one in five who said no harm was being done. Just 2% of respondents said companies should be able to collect personal data whenever they wanted.

Thus, even though the United States and Europe profess very different legal philosophies on the issue of privacy, public attitudes are broadly similar. Concerns about online privacy run deep across the Atlantic, especially with regard to search engines and social media sites and corporate control over personal information. Both Americans and Europeans also want their governments to institute laws that would protect users and hold companies accountable.

## Comparing Media Systems

Journalism and media systems in different parts of the world have different ethos on account of differences in their historical development and the vagaries of political and

economic structures and cultural values (Siebert, Peterson, & Schramm, 1956; Weaver & Willnat, 2012). These differences influence the way issues and events are covered around the world (Hanitzsch et al., 2011). Hallin and Mancini (2004) identified four dimensions along which media systems vary: (a) media markets, or the historical development of mass circulation press; (b) political parallelism, or the links between media and political parties; (c) journalistic professionalism, or the degree to which individual journalists and news organizations adhered to the “values” of the profession; and (d) state intervention, or the extent of direct influence of the administration on media practices.

Based on these dimensions, Hallin and Mancini (2004) classified North American and European media systems into three groups. The Polarized Pluralist Model of Southern Europe is marked by commentary-oriented or advocacy journalism, close links between news organizations and political parties, and a substantial role of the state. The Democratic Corporatist Model of Northern and Central Europe witnesses close links between news organizations and organized social groups, a historical trend of advocacy journalism but also a gradual move toward neutral journalism, and strong state support for and regulation of the media. In the Liberal Model of Northern Europe and North America—which includes the United States and Britain, along with Canada and Ireland—journalism is more information-oriented except in Britain, which is relatively more commentary-oriented. The role of the state is limited and links between news organizations and political parties or organized social groups—political parallelism—are low. As a result, news organizations typically follow “internal pluralism”—that is, each organization attempts to represent the plurality of political views and opinions in society. The exception once again is Britain, where different news organizations represent different political stances, leading to system-level or “external pluralism.” Also, while journalistic professionalism is high, the dominance of the commercial press means that market forces constrain news values and practices in this model.

Hallin and Mancini (2004) noted that all national media systems were eventually different from one another. Moreover, each media system itself underwent change over time, broadening differences with others. But similarities in early historical development and structural factors provide the basis for comparing the news content and journalistic practices of media systems belonging to a particular model.

## **Ideological Influences on News**

A litany of political, economic, social, and cultural factors influence “news making” (Tuchman, 1978), even in the most “professional” of media systems, namely, the United States and Britain. Shoemaker and Reese’s (2013) “hierarchy of influences model” organizes factors that influence news making across five levels of increasing scope: individual, media routines, media organizations, social institutions, and social systems. The influence of every successive level is mediated by those below it. The highest level of social systems, which circumscribes all other levels, comprises ideological influences that lead to the construction of “meaning in the support of power” (p. 64).

Ideology itself, however, is a complex and contentious notion, explained variously by different scholars. Van Dijk (1998), for instance, defined ideology as a group's beliefs about "who we are, what we stand for, what our values are, and what our relationships are with other groups" (p. 69). This is a useful way of understanding ideology because it recognizes ideology as collective thinking rather than an individual belief system. Collective thinking, however, corrals collective as well as individual action. Accordingly, Malesevic (2006) referred to ideology as "thought-action related to the conceptual organization of a particular social order" (p. 88). For journalists and news organizations, this means covering issues and events in a manner that conforms to—and consolidates—the established social and political hierarchy. But they typically do so unreflexively, without realizing that their thought-actions are ideologically determined or having ideological effects. That is because, as ideologies constitute their "worldview" (Williams, 1977, p. 109), thinking or acting in a particular manner appears the "natural" or "obvious" thing to do (Becker, 1984, p. 69).

### *National Identity as Ideology*

The nation with which a news organization identifies—its culture, values, and interests—constitutes a primary ideological constraint on news coverage of international issues and events. Westerståhl and Johansson (1994) argued in their analysis of the influence of ideology on news that "[w]hen international news reporting is studied, the national level might be the one to materialize first" (p. 75). This influence works in two ways. First, news organizations mainly cover those international events or issues that are deemed relevant for or of interest to their domestic audience. Second, the coverage is framed in a manner that corresponds to domestic cultural values and interests. A well-known example is Entman's (1991) comparison of U.S. media coverage of two international incidents: The Soviet shooting of a Korean flight was presented as moral outrage but when the U.S. Navy shot down an Iranian flight, it was presented as a "technical problem." Nosseck (2004) noted that "when a foreign news item is defined as 'ours,' then journalists' professional practices become subordinate to national loyalty" (p. 343; see also Harcup & O'Neill, 2001; Segev, 2015; Wu, 2000).

### *Sociopolitical Orientation as Ideology*

Nations themselves are not homogeneous entities but congeries of often conflicting cultures, values, and interests. These differences typically manifest themselves in the form of political parties or social groups with different ideological orientations. A key ideological rupture in many Western societies is between conservatives and liberals (see Lipset & Rokkan, 1967, for an historical overview). Such differences bear significantly on news coverage. Westerståhl and Johansson (1994) observed that "[n]ational interests are supported by national ideologies, but internal party politics might also be involved. Political parties can express different opinions on foreign policy issues" (p. 75), leading to different news organizations having different perceptions of what constitutes the national interest. Hallin and Mancini (2004) referred to such

orientations as “political parallelism” and noted that they cast a particularly long shadow over the media systems of Southern Europe (Polarized Pluralist Model) and Northern/Central Europe (Democratic Corporatist Model), as well as Britain (Liberal Model). More recently, a number of studies have suggested that U.S. media, even as they profess a culture of “objective” and “balanced” journalism (Reese, 1990; Schudson, 2001), have in fact become deeply partisan (Jamieson & Cappella, 2008; Levendusky, 2013; Stroud, 2010).

### *Capitalism as Ideology*

The central idea of this stream of research is that news coverage at worst explicitly advocates and at best fails to challenge the desirability of a capitalist mode of social and political organization. Political economy and critical media scholars on both sides of the Atlantic have examined capitalism as an ideological influence on news coverage in great detail (Augelli & Murphy, 1988; Bagdikian, 2004; Hall, 2011; Philo, 2014). Hallin and Mancini (2004) also noted that commercial pressures inhibit the professionalism of journalists and news organizations in Liberal Model nations. Perhaps the best-known exposition of this idea is Herman and Chomsky’s (1988) propaganda model, which identifies the capitalist structure of media systems in these nations and their deep links with advertisers as key “filters” of news content. More recently, media research based on new institutionalism (Cook, 1998; Sparrow, 1999) and field theory (Benson, 2006) also identifies capitalism as a deep influence on media content and practices.

Based on this review of literature and the preceding discussion on privacy law and attitudes in the United States and Britain, this study poses the following research questions:

**Research Question 1:** What were the dominant themes in the news coverage of “right to be forgotten” in the United States and Britain?

**Research Question 2:** How did the news coverage of “right to be forgotten” in the United States and Britain relate to their respective legal philosophies and public attitudes toward privacy?

**Research Question 3:** Which ideologies influenced the news coverage of “right to be forgotten” in the United States and Britain?

## **Method**

### *Sampling*

Two mainstream, large-circulation newspapers each from the United States and Britain provided the samples for analysis. The U.S. newspapers chosen for this study were *The Wall Street Journal*, which is perceived to be conservative, and *The New York Times*, perceived to be liberal. From Britain, the two newspapers were *The Financial Times* and *The Guardian*, also perceived to be conservative and liberal, respectively.

These newspapers were chosen to (a) reflect the dominant media discourse on RTBF in both nations and (b) represent both sides of the sociopolitical orientations of their media systems.

A Factiva search for “right to be forgotten” in each of these newspapers was conducted on May 4, 2015. No time period was specified, but the search was limited to articles in which the keywords appeared as an exact phrase in either the headline or the first paragraph of the article. This was done to ensure that the samples only included articles that focused on RTBF rather than referred to it simply in passing. The search yielded 40 news articles from *The Wall Street Journal*, 69 from *The New York Times*, 130 from *The Financial Times*, and 79 from *The Guardian*. The sample thus had 318 articles in total. The earliest articles were from the year 2010 but most of the coverage in all newspapers was from 2014, beginning with and following the ECJ ruling in the González case.

For analysis, this study combines topic modeling, a computer-assisted method of content analysis, with ideological criticism, a well-established method of qualitative textual analysis. Topic modeling is a relatively new method of analysis, especially in the field of journalism and communication studies, but is particularly apt for studying digitally processable corpora. It provides only a very basic framework for interpreting texts, but its probabilistic approach to content analysis can offset concerns about the external validity of qualitative analysis. Ideological criticism, however, leads to a rich understanding of the ideological factors that impinge upon the framing of news. Both methods thus supplement each other and such an approach can be especially useful for Big Data research.

### Topic Modeling

Topic modeling, or specifically latent dirichlet allocation (LDA), emerged in the field of computational linguistics (Blei, Ng, & Jordan, 2003) and is being increasingly used to study news texts (DiMaggio, Nag, & Blei, 2013; Jacobi, Atteveldt, & Welbers, 2016). Topic models are “algorithms for discovering the main themes that pervade a large and otherwise unstructured collection of documents” (Blei, 2012, p. 77). The method is based on the assumption that every text is made up of a set of topics that constitute its semantic structure and determine the probability of how words are used in relation to each other. It is therefore possible to arrive at “probabilistic models for uncovering the underlying semantic structure of a document collection based on a hierarchical Bayesian analysis of the original texts” (Blei & Lafferty, 2009, p. 1).

The LDA output includes a set of “topics” with (a) co-occurring words comprising each topic, and (b) the proportion in which each topic was utilized in the corpus. The method is inductive and unsupervised (DiMaggio et al., 2013), and the word relationships that emerge are statistical probabilities. But not every topic model accurately reflects the semantic structure of the corpus. The researcher needs to make sense of the proposed topics by looking at word patterns proposed by the model and interpreting how they relate with each other to constitute a meaningful topic. As Jacobi et al. (2016) noted, “it is up to the researcher to interpret the result of the model and to set up the

analysis in such a way that the results are useful to the study at hand” (p. 2). To do so, the researcher may rerun the algorithms several times, specifying a different number of topics each time and interpreting the proposed topics of each model, before arriving at a model that is semantically most appropriate (Ring, 2013).

Grimmer and Stewart (2013), while assessing the merits of automated content analysis methods, observed that such methods are “*incorrect* models of language” because “the performance of any one method on a new data set cannot be guaranteed” (p. 2, emphasis in original). Validation, therefore, is essential. Jacobi et al. (2016) noted that the internal consistency of each topic and theoretical interpretability of the overall model are the key tests of a topic model’s validity. Reliability can be ensured by using publicly available texts and being explicit about the composition of the corpus, so that other scholars may replicate the findings (see DiMaggio et al., 2013).

LDA also reveals the proportion in which each topic was used in various documents of the corpus. This allows the researcher to set up a study in such a way that the differences in proportion of use of different topics can be theoretically interpreted. This study, therefore, used topic modeling on the news coverage of RTBF in *The Wall Street Journal*, *The New York Times*, *The Financial Times*, and *The Guardian* concurrently to arrive at a common set of topics for all four newspapers. This allowed for comparative analysis based on the differences in proportion of use of each topic in the four newspapers. The topic modeling software used was MACHINE LEARNING FOR LANGUAGE TOOLKIT (MALLET; Graham, Weingart, & Milligan, 2012; McCallum, 2002).

### *Ideological Criticism*

As a key objective of this study is to understand the ideological influences on news coverage, ideological criticism was deemed an appropriate method of textual analysis. Foss (2004) suggested that ideological criticism should focus on (a) what is the dominant reading of a textual artifact, (b) what rhetorical strategies are used to make a particular reading dominant, and (c) whose interests are served by the dominant reading. It implies that an issue may be understood and interpreted in multiple ways, but rhetorical strategies are used to make particular readings dominate over others. But as ideologies structure what is “normal” or “obvious” (Becker, 1984, p. 69) and preclude the possibility of other interpretations, comparative analysis of texts that are potentially ideologically dissonant can help discern different readings—and the ideologies at play.

As Entman (1991) noted,

Comparing media narratives of events that could have been reported similarly helps to reveal the critical textual choices that framed the story but would otherwise remain submerged in undifferentiated text. Unless narratives are compared, frames are difficult to detect fully and reliably . . . (p. 6)

That is another reason why publications across national (United States/Britain) and sociopolitical (conservative/liberal) ideological spectrums were selected for this study.

**Table 1.** Topic Model of the Coverage of Right to Be Forgotten in WSJ, NYT, FT, and Guardian.

Topic 0	Topic 1	Topic 2	Topic 3	Topic 4	Topic 5
mr	mr	forget	eu	google	european
eu	privacy	office	data	search	links
internet	eu	wales	facebook	information	mr
data	regulators	directive	people	forgotten	union
personal	european	javid	personal	european	europe
media	europe	proposals	costeja	privacy	online
links	searches	child	justice	ruling	requests
justice	person	reviews	guardian	court	states
group	union	unfair	ecj	data	united
protection	web	taking	cases	links	europeans
sensitive	lindae	find	news	europe	percent
german	journal	viviane	judgment	results	american
ecj	thursday	incorrect	human	internet	microsoft
social	apply	mcdonald	commissioner	people	region
watchdogs	speech	regulation	case	online	antitrust
experts	street	general	made	company	report
thursday	removals	tweets	media	requests	spanish
groups	meeting	test	uk	companies	times
students	names	irish	don	law	privacy

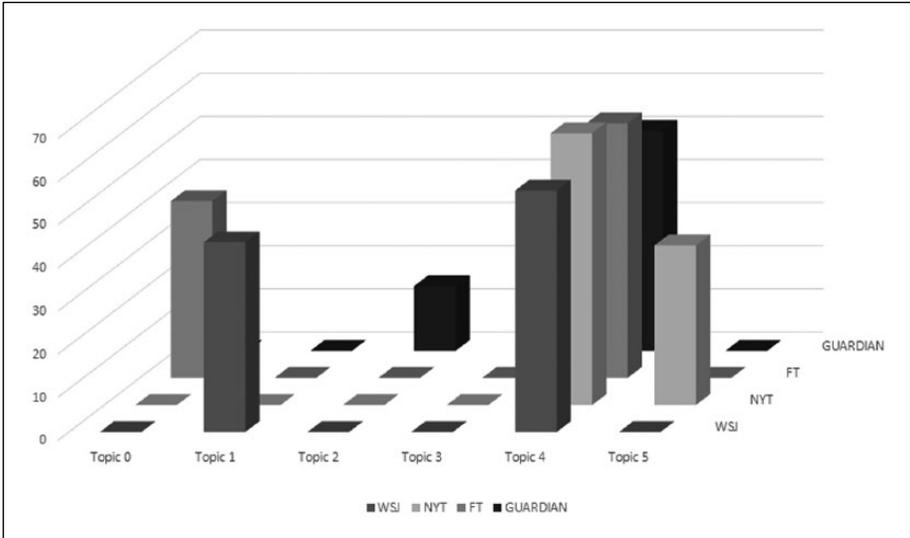
Note. WSJ = *The Wall Street Journal*; NYT = *The New York Times*; FT = *The Financial Times*.

## Results

### Topic Modeling

After several tests with different numbers of topics, the model with six topics emerged as the best-fitting model semantically (see Table 1). The topic numbers, 0 to 5, do not represent any order and are used only to differentiate the topics in the model. Topic 4 is the dominant topic in all samples, ranging from 51% to 63% in use (see Figure 1). It includes terms such as “google,” “search,” “european,” “privacy,” “ruling,” “companies,” “requests,” and “law.” These terms constitute the topic of the ECJ’s 2014 ruling on RTBF, especially as it impacts Google Search results. We can call this topic *ECJ Ruling*. As this was the event which generated most of the coverage on RTBF in all four newspapers, it is not surprising that this was the dominant topic. On one hand, this finding indicates that all four samples had a fairly similar semantic structure, providing the internal coherence that raises confidence that ours is a well-fitting topic model. On the other hand, it also amplifies the significance of the differences found in the proportion of use of other topics—thus aiding comparative analysis.

The second largest topics are different in all four samples. Among U.S. newspapers, Topic 1 is the second largest in *The Wall Street Journal* at 43% while the remaining



**Figure 1.** Proportion of different topics used in WSJ, NYT, FT, and the *Guardian*.

Note. WSJ = The Wall Street Journal; NYT = The New York Times; FT = The Financial Times.

topics are insubstantial. Topic 5 is the second largest in *The New York Times* at 37%. Among U.K. newspapers, Topic 0 is the second largest in *The Financial Times* at 40%, while Topic 3 is the second largest in *The Guardian* at 33%. These second largest topics differ along two dimensions: (a) the kind of data said to be affected by RTBF and (b) the fault line along which the RTBF protagonists and antagonists are split.

Topic 1, prominent in *The Wall Street Journal*, includes terms such as “searches,” “web,” “removals,” “names,” and “lindae”—indicating a concern with the impact of RTBF on web searches going beyond Google, especially the removal of names. “Lindae” refers to Greg Lindae, a Dutch investor who “successfully lobbied Google Inc. this month to remove from European search results for his name a *Wall Street Journal* article from 1998 that mentioned him as a participant in a Tantra workshop” (Schechner, 2014, p. B4). Topic 1 also includes “privacy,” “regulators,” and “speech,” indicating that the newspaper covered the RTBF issue as a war between right to privacy on one side and free speech on the other. We may therefore call this topic *Privacy Versus Free Speech*.

Topic 5 includes terms like “european,” “union,” “europe,” “states,” “united,” and “american.” This suggests that *The New York Times*, in which this topic is prominently used, viewed the RTBF as an issue that pitted the United States and the EU on opposing sides. We may call this topic *United States Versus EU* terms such as “antitrust,” “report,” and “Spanish” relate to Google’s mounting troubles in Europe, including antitrust lawsuits and problems with the Spanish data protection agency. This is the only topic to prominently feature “microsoft,” which relates to Bing—the Microsoft

company's search engine that, like Google, would also face the consequences of the RTBF ruling.

Topic 0, prominent in *The Financial Times*, includes terms such as "social," "media," "links," "sensitive," and "students." This indicates a focus on how RTBF will affect links on social media and sensitive student data. Topic 0 also includes "protection," "watchdogs," "experts," and "groups." "Protection" refers to data protection and "watchdogs" to privacy watchdogs in most articles. "Groups" are mostly corporate groups while "experts" are typically legal experts challenging RTBF. This topic thus indicates that for *The Financial Times*, the RTBF issue pits data protection and privacy watchdogs on one side and corporate groups supported by legal experts on the other. We may therefore call this topic *Corporate Groups Versus Privacy Watchdogs*.

*The Guardian* prominently used Topic 3, with terms such as "data," "facebook," "people," and "personal." This suggests that the newspaper saw the RTBF ruling as having an impact on users' rights to their personal data on social media, especially Facebook. The presence of "human" in this topic indicates that the newspaper covered RTBF as an issue concerning humans rather than a war between legal philosophies (Privacy Versus Free Speech in *The Wall Street Journal*), nations (United States Versus EU in *The New York Times*), or institutions (Corporate Groups Versus Privacy Watchdogs in *The Financial Times*). For instance, it interviewed Viktor Mayer-Schönberger, an Internet governance expert, to report that "the ability to forget our past, both on and offline, is an essential part of what makes us human" (Connolly, 2013). We may call this topic *Privacy as Human Right*.

Three general conclusions can be drawn from this analysis. One, the coverage of each newspaper had two main topics. The *ECJ Ruling* dominated the coverage of RTBF in all newspapers, especially in terms of its impact on Google Search. Every publication, however, had a different second topic. Two, the second topic usually pitted one protagonist against another in these newspapers, although who these protagonists were varied across publications. *The Guardian* was the only newspaper where the dominant second topic did not present such a fault line. Three, both British newspapers viewed the ruling as relating to users' personal data on social media, with *The Guardian* singling out Facebook data in particular. This potential impact of the ruling was, however, not so prominent in U.S. coverage, which focused instead on how it would affect web search in general, including search through other engines such as Microsoft Bing.

Topic modeling thus provides a basic interpretive framework for comparing the coverage of RTBF in the four newspapers. We can already see the influence of the ideologies of national identity, sociopolitical orientation, and capitalism in their coverage. Building on this framework, an ideological criticism of the coverage of the issue in each publication provides a more nuanced understanding of their similarities and differences.

### *Ideological Criticism*

The ideological criticism suggests that the coverage of RTBF in the U.S. and British media may be classified across five broad dimensions, with each of the four newspapers taking different positions along each dimension.

*United States Versus EU.* All four newspapers covered the RTBF issue as pitting the United States and the EU on opposite sides, but in different ways and to different degrees. *The Wall Street Journal* viewed the United States as being against online privacy regulations but identified President Barack Obama as pro-regulation. An early article noted, “The stakes keep rising in the debate over online privacy. Last week, the Obama administration floated the idea of a privacy czar to regulate the Internet, and the EU even concocted a new ‘right to be forgotten’ online” (Crovitz, 2010, p. A15). The use of the metaphor “czar” framed the proposed regulatory body as authoritarian entity.

*The Wall Street Journal’s* coverage after the 2014 ECJ ruling focused on what the newspaper considered to be the EU’s attempt to expand RTBF beyond its shores and even break up Google. The publication also used the issue to argue that the Internet was a product of “American exceptionalism” and a means of spreading American values for the benefit of the rest of the world. One article observed,

It’s not fashionable these days to note how American exceptionalism is reflected in the underlying architecture of the open Internet. In the U.S., free speech is second nature . . . The Web, built largely in the U.S., is “permissionless,” requiring no licenses or government approvals . . . Everyone in the world who uses the open Internet gets a taste of the First Amendment. Many others, including the European judges, instead believe information is for governments to control. (Crovitz, 2014, p. A13)

*The New York Times* compared RTBF with China’s efforts to regulate Internet use and noted that the EU should not expect to spread the regulation’s scope to the United States (Zittrain, 2014). The publication suggested that while RTBF would hurt the finances of American companies, it represented a new opportunity for European businesses to service clients who wanted to monitor and manage their online appearances (Scott, 2014a). Both U.S. newspapers thus framed RTBF as not simply against values that defined the United States but as intentionally detrimental to American ideals and interests.

*The Financial Times* also viewed the issue as driving a wedge between Europe and the United States. For instance, one article stated, “The decision from the European Court of Justice [to institute RTBF] marks the biggest blow yet to American Internet companies over European privacy standards” (Barker, Waters, & Fontanella-Khan, 2014, p. 1). But unlike U.S. newspapers, it did not suggest that the ruling was intentionally anti-American. Moreover, it observed that Britain was on the side of the United States in this battle.

*The Guardian*, too, observed that Britain with the United States and against the rest of Europe on this issue. But unlike *The Financial Times*, *The Guardian* criticized Britain’s position. For example, one article noted, “The clash between Brussels and the [British] Ministry of Justice has erupted in the final stages of negotiations over the EU’s General Data Protection Regulation, which aims to rebalance the relationship between the individual and the Internet” (Bowcott, 2013, p. 1). The use of “rebalance” implied that *The Guardian* saw the relationship as heavily imbalanced and, therefore, in need of regulatory interference. The newspaper also repeatedly noted that RTBF

was not a new directive but already guaranteed in the laws of the EU and several member nations.

**Censorship.** Both U.S. newspapers agreed that RTBF undermined freedom of speech and was a form of censorship. They emphasized instances of pedophiles, errant doctors, and corrupt politicians trying to scrub information about their misdeeds to argue that RTBF would have a deleterious effect on society. *The Wall Street Journal* was particularly vehement in its critique. *The New York Times* highlighted Google's executive chairman Eric Schmidt's statement following the ECJ ruling: "A simple way of understanding what happened here is that you have a collision between a right to be forgotten and a right to know" ("Quotation of the Day," 2014, p. 2).

*The Financial Times* also reported that RTBF was a form of censorship. To do so, it often relied on representatives of the technology business. One article reported, "James Waterworth of the CCIA, a tech industry lobby group, said the [ECJ] ruling could lead to 'large-scale private censorship in Europe' and 'open the floodgates' for requests to remove links to legal and publicly available information" (Barker et al., 2014, p. 1).

*The Guardian* was the only newspaper that did not represent RTBF in these terms. For instance, it reported the EU Justice Commissioner Viviane Reding stressing that RTBF would "not be absolute" and would be assessed in relation to other rights, such as freedom of expression (Bowcott, 2013). The publication also noted that free speech itself was not an absolute right, nor did it mean the same thing everywhere: "Removing 'blasphemous tweets' in Pakistan might be seen as repressing free speech in America, whereas in Pakistan it might be interpreted as asking for respect for social norms" (Bell, 2014, p. 29). *The Guardian* also quoted free speech campaigners as saying that RTBF was a good measure (Arthur & Gibbs, 2014).

**Free Market Versus Regulators.** *The Wall Street Journal* called the RTBF "the object of vociferous debate and lobbying between privacy-rights advocates and much of the technology industry," and the outcome of the debate would have a profound effect on the Internet in and beyond Europe (Mizroch, 2014). It also explicitly took the position that regulation, per se, was a bad idea: free market regulated itself. As another article noted, "Regulators have no reason to dictate one right answer to these balancing acts among interests that consumers are fully capable of making for themselves" (Crovitz, 2010, p. A15).

On similar lines, *The New York Times* said courts could not be relied upon to handle matters such as online privacy. One article argued, "How an individual's reputation is protected online is too important and subtle a policy matter to be legislated by a high court, which is institutionally mismatched to the evolving intricacies of the online world" (Zittrain, 2014, p. 29). Instead, it suggested that the benign intentions of technology companies should be trusted to do the job. As one article noted,

Mr. Feiler [a lawyer] in Vienna says the best hope is market innovation. With people attuned to data proliferation, he says, businesses with enhanced privacy options should prosper. Social networking sites, for instance, could differentiate themselves by offering

automatic erasure, giving users the choice to delete their entire records, say, every six months. (Singer, 2011, p. 3)

Across the Atlantic, *The Financial Times* took a less explicit but nonetheless pro-business position, noting that companies would suffer on account of RTBF. One article reported legal experts as saying that RTBF “could impose a heavy burden on Google and leave the U.S. company few realistic options to escape compliance.” One lawyer even feared that “Google could soon cease to be a useful tool for collating biographical information” (Cookson & Fontanella-Khan, 2014a).

*The Guardian*, again, was the only publication to take a different position. From early on, it covered the issue as a battle between big business and common people who needed regulatory support to stand up to corporate malpractice (Mayes, 2011). For instance, it reported the widespread public concern over online privacy: “Research . . . found that 68% of people in Britain expressed concern about their online privacy, with 22% saying they were ‘very concerned’” (Tremlett, Chrisafis, & Connolly, 2013, p. 20). The newspaper also questioned the motives of companies that were complaining against RTBF: “[T]he tech companies’ libertarian embrace of deregulation is not rooted in the desire for freedom of expression, as they often claim, but in the desire to be unrestricted from making as much money as possible” (Kettle, 2014, p. 33).

**Practicality.** There was not much discussion in *The Wall Street Journal* on the practical challenges of implementing RTBF. *The New York Times* noted that the ruling was ambiguous and would lead to confusion about how the court intended it to be put into practice. An editorial observed that “the ruling provided little guidance to lower courts about how to decide when links should be removed” (“Ordering Google to Forget,” 2014, p. 26). In the days and weeks following the ruling, the newspaper continued to report the ever-increasing tally of people who had submitted RTBF requests to Google, going from “about 1,000 Europeans” on May 30 (Hakim, 2014) to “50,000 submissions” by June 18 (Scott, 2014b) to “roughly 140,000 privacy requests connected to more than 500,000 links” by October 4 (Cohen & Scott, 2014, p. 3). These numbers cued just how difficult it was for Google to keep up with the growing number of requests.

*The Financial Times* also considered the implementation of the ruling to be a serious concern. One report asked, “The question is practical. Can this be achieved? Will it create an unmanageable flow of demands for deletions? What happens if a video is copied and published elsewhere? To what lengths must Google go to remove related material?” (Barker & Fontanella, 2014).

*The Guardian* did not take a clear position on the issue. It quoted British Justice Minister as saying that implementing RTBF “may be an unmanageable task” that would cost British businesses “£360m a year” (Bowcott, 2014). On the contrary, one commentator took the practicality issue head on and argued that practical challenges cannot “trump the need to do the right thing if we can.” The commentator argued that “practical problems exist to be worked around. They do not obviate the principle” (Kettle, 2014, p. 33).

*Cause.* Both American newspapers said that NSA whistle-blower Edward Snowden's revelations had spurred the regulatory action. An *Wall Street Journal* article noted that "Google has become a punching bag for Europeans upset by the Edward Snowden revelations . . . The preliminary ruling arrived just days after the first Snowden stories appeared in the world press" (Jenkins, 2014). *The New York Times*, too, suggested that the ruling "comes alongside deep mistrust of American technology spurred by the revelations about the United States government's mass surveillance practices" (Hakim, 2014, p. 1). But unlike *The Wall Street Journal*, *The New York Times* coverage noted that the leaks did create grounds for apprehension. It even carried an article by Julian Assange (2014), in which the WikiLeaks founder argued,

At their core, companies like Google and Facebook are in the same business as the U.S. government's National Security Agency. They collect a vast amount of information about people, store it, integrate it and use it to predict individual and group behavior, which they then sell to advertisers and others. This similarity made them natural partners for the NSA, and that's why they were approached to be part of PRISM, the secret Internet surveillance program.

*The Financial Times* observed that the EU had been working on privacy protection for a long time, although Snowden's revelations did catalyze the process (Cookson & Fontanella-Khan, 2014b). *The Guardian*, right from the outset, made the case that RTBF was needed to protect users from the malpractices of technology companies, especially Facebook. An early article reported, "[EU Justice Commissioner Viviane] Reding's spokesman, Matthew Newman, said: 'A year ago she issued Facebook a warning because the privacy settings changed for the worse and now she's legislating to put flesh on those bones'" (Brussels, 2011, p. 27).

Its coverage constantly noted that RTBF was a direct fallout of these companies' unsatisfactory privacy policies. Snowden's exposé in 2013 became a part of the coverage, but the newspaper saw it as a validation of the fears it had already been raising rather than a cause of the 2014 RTBF ruling. As one article read, "Digital advances and secrecy have allowed the American government to acquire undreamed-of information power about every new media user on the planet. Snowden's revelations confront us with the responsibility to apply proper controls and necessary safeguards to that activity" (Kettle, 2014, p. 33).

## Discussion

News media are purveyors of information online, sites of public contestation on knotty issues related to information control, and institutions that potentially shape both public and policy agendas. A closer understanding of media coverage, therefore, not only lays bare the terms of the debate on an issue such as RTBF but also exposes the relations of power that underlie the ideas and interests in contestation. Our topic modeling and ideological criticism of media coverage have laid bare the key themes that featured in this debate. Those who were against RTBF called it impractical and a challenge to

cherished values such as freedom of expression. Those in favor questioned the veracity of these criticisms while stressing the need for regulation and the unreliability of technology companies and big business. Understanding these rhetorical strategies is useful not only because it gives us a clearer picture of how and why RTBF became so contentious, but also because future debates relating to information access and control may be fought on similar terms, with stakeholders employing similar strategies.

Juxtaposing the news coverage of RTBF in the United States and Britain with legal approaches and public attitudes toward privacy on either side indicates the position of various stakeholders in this debate and the relations of power that shape its outcome. In the United States, there is a sharp disconnect between the legal view and the public perception of privacy, and the news media reflect and reproduce the legal view. In this view, breach of individual privacy is measured against “bigger” societal interests such as freedom of expression and cost to businesses—or *resource privacy*. But the American public’s expressed opinion is itself in favor of stricter privacy laws, and RTBF specifically, and the media take little cognizance of it. We may, therefore, conclude that the “societal” interests that outweigh privacy concerns for the U.S. media are effectively corporate interests: Journalists and news organizations do not seem to care about the harm to individual users of the Internet if it helps mitigate the costs and constraints upon technology companies that tougher privacy laws would bring. Such media support may be a vital prop allowing the legal system to defy public opinion and public interest in favor of business interests (see Mantelero, 2013).

Lawmakers and the public are more in sync on the other side of the Atlantic: both tend to believe in *dignitary privacy*, or privacy as an inviolable individual right. But media coverage in Britain is split down the middle. While *The Guardian* took a dignitary privacy approach in its largely pro-RTBF coverage, *The Financial Times* did not. The business publication’s pro-business stance was closer to the U.S. media than the legal thinking or public opinion in Britain. Not surprisingly, therefore, *The Guardian* was the only newspaper in this study that included the findings of public opinion polls in its RTBF coverage, which overwhelmingly support tougher privacy legislations. While the remaining three publications invoked the public’s right to free speech to buttress their anti-RTBF stance, none of them actually reported what the public at large was saying on the subject.

A number of theoretically interesting conclusions may be drawn from this comparative analysis. First, the coverage in none of the newspapers represents *internal pluralism*—giving voice to different perspectives and viewpoints in a publication. The media systems in both the United States and Britain belong to Hallin and Mancini’s (2004) Liberal Model, of which internal pluralism is supposed to be a vital feature. It constitutes a key difference between the Liberal Model and the other two models. But this study finds little evidence of internal pluralism in any publication. Even oped articles, which do not necessarily reflect editorial stance, conformed to each publication’s general position on RTBF. While the scope of this study is limited to a single issue, future empirical research may consider the extent to which internal pluralism remains relevant in Liberal Model nations.

Second, differences between *The Financial Times* and *The Guardian* indicate *political parallelism* and the presence of *external pluralism* in Britain. The perceived conservative *Financial Times* emerged as anti-RTBF on all five dimensions of ideological criticism, while the perceived liberal *Guardian* was mostly pro-RTBF. Together, these newspapers covered a broad variety of opinions, allowing the British readership the opportunity to gain a wholesome understanding of the issue. However, both U.S. publications—the perceived conservative *Wall Street Journal* and the perceived liberal *New York Times*—were anti-RTBF, discounting the occasional difference of opinion in the latter. This indicates the lack of even external pluralism in U.S. news coverage—to compound the absence of internal pluralism. The readership reliant on U.S. news media had access only to pro-business and anti-privacy perspectives on the issue. This, however, need not imply lack of political parallelism in a country where political parties of both “liberal” and “conservative” orientations are staunchly capitalist, as recent political science research has indicated (Gilens & Page, 2014).

Third, different kinds of ideologies—national identity, political orientation, and capitalism—do not operate exclusively; rather, they interact with and reinforce each other in news coverage. The influence of national identity, for instance, was evident in the differences in coverage between British and American newspapers. Even though *The Financial Times* took a similar stance as both the U.S. publications, its coverage still differed on dimensions such as United States Versus EU, Free Market Versus Regulators, and cause. For American publications, the normativity of national identity served as a justification for promoting their capitalist ideology. Anti-regulatory and free speech values were championed not because they were somehow better or more important than data protection and privacy rights per se, but because they were “American.” This convergence of ideologies led to RTBF being interpreted as an enemy to be challenged and resisted. Such coverage benefited technology companies and, ultimately, the corporate groups that run the newspapers themselves. Alongside, it relegitimized and reinforced dominant understandings of what it means to be American and, indeed, free market itself as an American value.

This study’s combination of topic modeling, an up-and-coming technique of automated content analysis, and qualitative textual analysis using ideological criticism is also a useful methodological contribution to the field. Topic modeling showed that the ECJ ruling was the focus of coverage in all publications. But it also found differences between U.S. and British coverage, and *The Guardian*’s coverage in particular stood out from the rest. This served as a useful starting point but was still a bare-bones framework. Ideological criticism not only replicated these findings but also added flesh to the bones, helping develop a thorough, nuanced understanding of the terms of the debate. It ascertained the reliability of topic modeling even as topic modeling provided validity to ideological criticism—indicating that qualitative analysis was not selectively used to find supporting evidence but was also a statistical probability. Both techniques, thus, complemented each other.

Future research may build on the key findings of this study as well as address its limitations. For instance, scholars may ascertain if lack of internal pluralism exhibited by all publications in this study is specific to the RTBF issue or a common feature of

media coverage of concerns related to information access and control. RTBF is only one of a growing number of such issues that pit legal philosophies, moral values, institutions, and even nations on opposite sides (Weber, 2015). As media organizations themselves disseminate information online and are key stakeholders in such debates, media discourses should be of interest to both media sociologists as well as scholars of public policy and law. Also, scholars of media effects might want to study why the media coverage of this issue has virtually no bearing on public opinion. One explanation could be that privacy-related issues are highly *obtrusive*: The public has personal knowledge of and experience with such issues and is not limited to media coverage for understanding them. The media's ability to influence public opinion of such issues is therefore curtailed (McCombs, 2013).

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