
Policy Brief :

Personal Data Protection in Armenia

December 2025

Purpose

This Policy Brief serves as a strategic roadmap for international and local donor organizations, civil society actors, and state institutions involved in Armenia's digitization, governance, and human rights sectors.

Its primary objective is to map the critical needs arising from Armenia's recent commitments under the EU Visa Liberalisation Action Plan (VLAP). While acknowledging the Government's ongoing legislative reforms to establish an independent Personal Data Protection Authority (PDPA) , this document identifies specific systemic gaps—particularly regarding sectoral harmonization and training and public awareness—that remain unaddressed by current initiatives.

Context of the Brief

On 5 November 2025, the European Commission officially presented the Armenia-EU Visa Liberalisation Action Plan (VLAP) to the Government of Armenia. This strategic document sets specific benchmarks for the country, explicitly conditioning progress on the strengthening of personal data protection. Specifically, the Action Plan mandates the establishment of a truly independent personal data protection authority (PDPA) vested with adequate powers, responsibilities, and the necessary human and financial resources. It further requires the effective implementation of PDP legislation across both public and private sectors, alongside comprehensive training and awareness-raising guidelines for public institutions. The provisions related to PDP in the document are as follows (citation):

- the establishment of an independent personal data protection authority vested with adequate powers, responsibilities, and the human and financial resources necessary for the exercise of its mandate,
- the implementation of personal data protection legislation in both the public and private sectors,

- training and awareness-raising programmes on data protection, including the development of guidelines for public institutions and officials.

In anticipation of these commitments, the Government of Armenia has already initiated high-level consultations to align national frameworks with European standards. On 31 October 2025, a consultation led by the Prime Minister of Armenia reviewed the concept for establishing a new independent personal data protection authority, as well as discussed issues related to the implementation of the concept – such as needs assessment, stakeholder engagement, and development of the legislative package. This consultation effectively confirmed the reform concept, emphasizing that ensuring the authority's independence is critical not only for domestic data security but also for fulfilling Armenia's international obligations, particularly within the visa liberalisation process.

These developments are consistent with systemic needs previously identified in the Government's Action Plans for 2019–2023 and 2021–2026. To operationalize this vision, an EU-funded project was launched in August 2025 to provide immediate technical support. The primary expected outcomes of this intervention include the development of a legislative amendment package ensuring the PDPA's full independence (GDPR compliant), a 3-year PDP Strategy, and a 3-year Institutional Development Plan for the new authority.

Rationale / Identified Issues

The above-mentioned developments in the field of data protection are consistent with the systemic issues previously identified in the area of personal data protection under the Government's Action Plan for 2019–2023, and subsequently under the Government's Action Plan for 2021–2026.

Specifically, the Government Programme identified the problem of harmonising sectoral legislation that involves personal data processing with the PDP Law and with the core principles of personal data processing; the lack of knowledge and awareness on PDP remains a systemic issue across both the wider public and state institutions. Current reform efforts are focused on high-level legislative changes primarily aimed at ensuring the independence of the PDPA and include only limited provisions for training. There is currently no comprehensive, long-term framework for:

- systematic retraining of public servants;
- educational modules for schools or universities;
- broad public awareness campaigns required to create a culture of data privacy.

While the current project will deliver a 3-year PDP Strategy and Institutional Development Plan, there are no designated instruments or support mechanisms to ensure their medium- and long-term execution. The establishment of a new independent authority will require sustained operational support, technical capacity building, and financial resources beyond the drafting phase to fulfill the mandate envisioned by the VLAP.

Taking into account all of the above, the target audience of this Brief includes:

- international and local donor organisations operating in Armenia,
- civil society organisations,
- state institutions insofar as they plan or may plan personal data processing activities, reforms, or projects within their mandates.

Recommendations

Below are the measures, the implementation of which could significantly promote and support personal data protection reforms in Armenia and ensure an adequate level of personal data protection in the country:

- **Organization of public discussions and stakeholder engagement** on the upcoming legislative reforms ensuring the independence of the PDPA – crucial within the next six months to ensure that the draft legislative package is consensus-based and publicly supported.
- **Trainings, capacity-building, and public awareness programmes** for various stakeholder groups on PDP – this measure is important in the short, medium, and long term to help address the systemic issue of lack of knowledge and awareness on data protection. In this context, the implementation of sustainable, long-term training programmes may be particularly important (e.g. long-term retraining programmes for public servants, educational modules in educational institutions, civil society, etc.).
- **Measures aimed at harmonizing sectoral legislation** involving the processing of personal data and assessing the compliance of personal data processing in various sectors with the principles of personal data processing – this measure is important in the short, medium, and long term to support addressing the systemic issue of harmonizing legislation across different sectors involving personal data processing (including, but not limited to, healthcare, law enforcement, education, social care, justice, digitalization of public services, application of new technologies and tools, etc.).
- **Support for the implementation of the PDP Strategy and Institutional Development Plan** – while the current EU-funded project will develop these strategic documents, there is currently no mechanism to support their execution. Mobilizing resources to ensure the new PDPA is vested with the necessary human, financial, and technical capabilities is essential to meeting the benchmarks of the EU Visa Liberalisation Action Plan.