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The Dangerous Dissemination of Personal Data and Its Legal Consequences

In recent years, hate speech and aggression on social media have increased worldwide. These developments are often accompanied by the publication of personal data and have led to a disturbing phenomenon within peaceful societies. During the protests in Georgia in 2024-2025, both law enforcement authorities and civil society activists circulated photos, names, and home addresses of individuals with dissenting opinions in open and closed chats, often with the intent to intimidate or harass them.¹ This contributed to both physical attacks and online harassment against the targeted individuals. Because much of the disseminated information involved publicly available data, such actions were not punishable under Georgian law and law enforcement authorities did not intervene. This legal gap in Georgian legislation could be addressed by drawing on Section 126a of the German Criminal Code (StGB), which was introduced in 2021 specifically to combat this type of behavior.

Keywords: Public order, personal data, data dissemination, enemy lists, hate speech.

1. Introduction

In 2021, a new provision entered into force in the German Criminal Code (StGB) – Section 126a StGB, concerning the dangerous dissemination of personal data. This provision criminalizes the sharing of both public and non-public personal information if done with the intent to place the affected person or someone closely associated with them in potential danger.² It provides for imprisonment of up to two years for public information and up to three years for non-public information.³ The provision was introduced as part of a law amending the Criminal Code to enhance criminal protection against so-called “enemy lists.” The aim of this regulation is to safeguard public order, general legal security, peaceful coexistence among citizens, and the public's sense of safety against potential disruptions caused by the dangerous dissemination of personal data.⁴ This legal change responds to the growing spread of enemy lists on social media, the increasing number of related criminal offenses, and the unrest it causes within the population. These developments pose not only risks to individual security but also negatively affect social cohesion.⁵

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¹ <<https://mtavari.tv/news/171574-aktsiis-darbevashi-monacile-modzalade>> [25.09.2025].

² Fischer T., Strafgesetzbuch, 71. Aufl. 2024, § 126a Rn. 4.

³ Rackow P., in Heintschel-Heinegg/Kudlich, BeckOK StGB 61. Aufl. 2024, §126a Rn.11.

⁴ BT-Drs 19/28768, S. 8.

⁵ Patz J., KriPoZ 4 | 2021, 223; Hestermann T./Hoven E./Autenrieth M., KriPoZ 4 | 2021, 204.

2. Legal Interpretation of §126a StGB

The offense outlined in Section 126a of the German Criminal Code (StGB) primarily concerns the dissemination of publicly accessible personal data and encompasses any form of such dissemination, even if it involves the data of just one individual.⁶ Accordingly, the scope of this provision includes not only the spread of so-called “enemy lists,” but also the act of doxxing.⁷

The compilation of enemy lists is a strategy frequently employed by politically motivated groups,⁸ whose anti-democratic agendas involve intimidating and inciting crimes against unwanted individuals, such as “opponents” or “traitors” from the political sphere, civil society, or journalism.⁹ These threats are often made in indirect or veiled terms, such as suggesting that “a visitor should pay this person a visit” or that “it might be appropriate to do something about this person or teach them a lesson.”¹⁰

Such indirect threats pose real dangers both online and offline, ranging from threatening messages to life-threatening attacks.¹¹ Victims are particularly frightened by the possibility that perpetrators might appear at their private homes,¹² which can lead them to restrict their own movements out of fear. At the same time, other members of society begin to self-censor alongside the victims, refraining from expressing their opinions openly to avoid becoming the next target. This dynamic significantly hinders the development of democratic processes in a country.¹³

In the English-speaking world, this phenomenon is commonly referred to as *doxxing*, the deliberate collection and publication of personal information with the intent to shame, threaten, harm,¹⁴ harass, or publicly humiliate the targeted individual.¹⁵ Offenders often focus on former partners, colleagues, or people they have encountered on social media platforms.¹⁶

2.1. Legally Protected Interest – Public Peace

The term “public peace” encompasses not only general legal security and the peaceful coexistence of citizens, but also the public's trust in the permanence of this condition and their sense of safety, both of which are undermined by the dissemination of so-called “enemy lists.”¹⁷ A secondary legal interest protected by this provision is the individual security of the victims, including their family

⁶ Eisele J., in Klass/Momsen/Wybitul, Datenschutzsanktionenrecht, Aufl. 2023, § 9 Rn. 6.

⁷ Kubiciel M./Großmann S. NJW 2019, S.1050; Vassilaki I., K&R 12/2021, S. 764.

⁸ Patz J., KriPoZ 4 | 2021, 223.

⁹ Referentenentwurf des BMJV, S. 4; Gerhold S., in Schumann/Mosbacher/König, NK-Medienstrafrecht, Aufl. 2023, §126a Rn. 3; BT-Drs. 19/28678, S. 2.

¹⁰ BT-Drs. 19/28678, S. 1; Heckmann D., in Stern/Sodan/Möstl, Staatsrecht II, Aufl. 2022, §102 Rn. 90, 91.

¹¹ Korenke C./Kühne M., NK 2022, 457, 462; Kubiciel M., Stellugnahme S. 3.

¹² BT-Drs 19/28768, S. 8.

¹³ VBRG, Stellungnahme, S. 1; Deutscher Bundestag Feindeslisten nach §126a.

¹⁴ Woerlein A., H, MMR-Aktuell 2024, 1437.

¹⁵ Kubiciel M./Großmann S., NJW 2019, 1050.

¹⁶ Kubiciel M., Stellugnahme, S. 3.

¹⁷ Eisele J., in Klass/Momsen/Wybitul, Datenschutzsanktionenrecht, Aufl. 2023, § 9 Rn. 4.

members and close associates, as well as their protection from the risk of becoming victims of criminal offenses.¹⁸

2.2 Objective Elements of the Offense

The basic offense requires that personal data of a third party, which is capable of revealing their identity, be disseminated publicly either in a gathering or by distributing content in a manner intended to expose the affected person or someone close to them to a potential danger of a crime directed against them or another unlawful act targeting their sexual self-determination, physical integrity, personal freedom, or an item of significant value.¹⁹ From an **ex-ante** perspective (i.e., prior risk assessment), it is sufficient that the manner of publication is objectively capable of endangering the targeted individual or their close associates. The offense does not require actual harm to occur. Rather, the potential for harm is sufficient to constitute a punishable act.²⁰

2.2.1 Object of the Offense

According to Section 126a (1) of the German Criminal Code, the object of the offense is publicly accessible personal data that can be easily obtained by any person without significant effort. Examples include names, dates of birth, residential addresses, or email addresses.²¹

In the second paragraph of § 126a StGB, the object of the offense is non-public personal data. This refers to information that is protected by access restrictions, internal departmental confidentiality, or passwords. Data remains classified as non-public even if such protections have been breached and the offender or third parties have gained unlawful access.²²

2.2.2 The Criminal Act

The criminal act consists in the dissemination of personal data. The term “dissemination” refers to the transmission of data in any form to a broad, undefined group of people,²³ in a way that the disseminator loses control over the information. This includes, for example, sharing via live streams, messages, fax, SMS, or email.²⁴ Dissemination of data within a private setting or a closed group of a small number of recipients does not constitute a criminal offense under this provision,²⁵ so long as the originator retains control over the information.²⁶

¹⁸ *Fischer T.*, Strafgesetzbuch, 71. Aufl. 2024, § 126a Rn. 3; *Heger M.*, in Lackner/Kühl/Heger, StGB 30. Aufl. 2023, § 126a Rn. 1-9; BT-Drs. 19/28678, S. 8.

¹⁹ *Fischer T.*, Strafgesetzbuch, 71. Aufl. 2024, § 126a Rn. 4.

²⁰ *Werner, R.*, in Weber Rechtswörterbuch, Gefährdungsdeldikt, Gefährdendes Verbreiten personenbezogener Daten, 32. Ed. 2024.

²¹ *Korenke C./Kühne M.*, NK 2022, 457, 460.

²² *Fischer T.*, Strafgesetzbuch 71. Aufl. 2024, § 126a Rn. 17.

²³ *Gerhold S.*, in Schumann/Mosbacher/König, NK-Medienstrafrecht, Aufl. 2023, § 126a Rn. 8-11; *Eisele J.*, in *Klass/Momsen/Wybitul*, Datenschutzsanktionenrecht, Aufl. 2023, § 9 Rn. 10.

²⁴ *Eisele J.*, in *Klass/Momsen/Wybitul*, Datenschutzsanktionenrecht, Aufl. 2023, § 9 Rn. 12.

²⁵ *Fischer T.*, Strafgesetzbuch, 71. Aufl. 2024, § 126a Rn. 6.

²⁶ *Heger M.*, in Lackner/Kühl/Heger, 30. Aufl. 2023, StGB § 126a Rn. 3.

2.2.3 Objective Indicators for Determining Danger

The objective indicators for establishing a potential danger are “suitability” and “reality”. This means that only the objective circumstances present at the time of dissemination are to be taken into account when assessing the danger.²⁷ Any subsequent developments, such as the actual use of the data by third parties for criminal acts, must be evaluated separately and do not retroactively affect the original assessment.²⁸ When evaluating objective indicators, special attention must be paid to contexts and circumstances that reveal a high potential for danger. These include, for example, demonstrations, websites with extremist content, links to unconstitutional organizations, the anonymity of the author, and other high-risk environments.²⁹

2.3. Subjective Elements of the Offense

To fulfill the subjective requirements of § 126a, conditional intent (*dolus eventualis*) is sufficient. This means that the perpetrator does not need to have a concrete idea of who might commit which specific crime using the disseminated personal data. It is enough that the offender seriously considers the possibility that such a crime might occur and accepts it as a potential consequence.³⁰ The potential crime must be directed against the individual rights of the data subject or someone closely connected to them.³¹ An exception applies to cases where the resulting danger was entirely beyond what the perpetrator could have foreseen.³²

Proving intent in cases involving the dissemination of public information poses significant challenges.³³ In particular, the difficulty lies in determining whether the dissemination of such information was suitable for creating a danger, something that is assessed *ex post* (after the fact).³⁴ This creates a tension with the legal principle that *dolus eventualis*, a form of indirect intent, must already exist at the moment the act is committed. The challenge lies in excluding subsequent developments that are beyond the offender’s control but nonetheless significantly influence the legal assessment of their actions.³⁵ To resolve this dilemma, courts are required to ensure that the intent is proven based on the circumstances at the time of the act, regardless of events that occur later and lie beyond the offender’s control, such as political developments that may influence the level of threat.³⁶

²⁷ Eschelbac, R., in Kindhäuser/Neumann/Paeffgen, NK-StGB, Aufl. 2023, § 126a Rn. 18-22; BT Drs. 19/3115.

²⁸ Eisele J., in Klass/Momsen/Wybitul, Datenschutzsanktionenrecht, Aufl. 2023, § 9 Rn. 15.

²⁹ BT-Drs. 19/28678, 11; Gerhold S., in Schumann/Mosbacher/König, NK-Medienstrafrecht, Aufl. 2023, § 126a Rn. 18.

³⁰ Basar E., Stellungnahme, S. 7.

³¹ Zimmerman F., in Satzger/Schluckebier/Werner, StGB-Kommentar, 3. Aufl. 2023, § 126a, Rn. 19.

³² Fischer T., Strafgesetzbuch, 71. Aufl. 2024, § 126a Rn. 12.

³³ Lohse K., Stellungnahme, S. 4.

³⁴ Grözingen A., in Müller/Schlothauer/Knauer, MAH, 3. Aufl. 2022, § 50 Rn. 111-113.

³⁵ Golla S., Stellungnahme, S. 2.

³⁶ Lohse K., Stellungnahme, S. 4.

2.4. Exclusion of Criminal Liability

The provisions of § 126a do not apply when the dissemination of information serves purposes such as informing the public, exposing anti-constitutional activities, or contributing to art or science, research or teaching, reporting on current or historical events, or other similar objectives.³⁷ This exception is particularly important for journalistic work, as it enables investigative reporting, such as uncovering extremist groups and their agendas,³⁸ including the disclosure of their identities, without fear of criminal prosecution.³⁹

2.5. Illegality

In general, the issue of illegality is mostly clearly defined as unlawful even if the offender commits the act with the intention of protecting security, since no immediate threat arises from the listed persons that would justify an immediate response. Nevertheless, the act remains punishable despite the person's consent to the dissemination of personal information if it weakens the sense of public security.⁴⁰ This is especially the case when it contains elements of threats or indirect incitement.⁴¹

3. Legal Challenges of § 126a StGB

3.1. Restriction of Freedom of Expression and Freedom of the Press

The purpose of this law is to protect political opponents from intimidation and crimes directed against them. However, this intention may have an undesirable impact on the climate of political discussion and the formation of free opinion.⁴² The main difficulty lies in defining the boundaries between the freedom of expression protected by Article 5 of the German Basic Law and Article 10 of the European Convention on Human Rights, and the restrictions imposed by § 126a StGB. Therefore, when assessing individual cases, a careful balancing of legal interests is required.⁴³ It must be emphasized that the content of an opinion itself cannot be prohibited; rather, restrictions may apply to the form and means of its expression if they exhibit elements of a criminal offense. In such cases, the expression crosses the threshold that infringes upon legally protected interests.⁴⁴

Moreover, despite the clause that excludes certain acts from punishment, the potential consequences of the law could lead to self-censorship among journalists and activists. Such “chilling effects” are likely to hinder the dissemination of important publications and journalistic investigations that are essential for the formation of public opinion.⁴⁵

³⁷ Gerhold S., in Schumann/Mosbacher/König, NK-Medienstrafrecht, Aufl. 2023, §126a Rn. 23.

³⁸ Eisele J., in Klass/Momsen/Wybitul, Datenschutzsanktionenrecht, Aufl. 2023, § 9 Rn. 24.

³⁹ BT-Drs 19/29638, 12; DRB, Stellungnahme, S.1.

⁴⁰ Eisele J., in Klass/Momsen/Wybitul, Datenschutzsanktionenrecht, Aufl. 2023, § 9 Rn. 4.

⁴¹ Zimmerman F., in Satzger/Schluckebier/Werner, StGB-Kommentar, 3. Aufl.2023, § 126a, Rn. 20.

⁴² Golla S., Stellungnahme, S. 2; DRB, Stellungnahme, S.2.

⁴³ Lohse K., Stellungnahme, S. 5; DRB, Stellungnahme, S. 2.

⁴⁴ BT Drs. 19/30943 S.2; Lohse K., Stellungnahme, S. 5.

⁴⁵ Golla S., Stellungnahme, S. 2; Aus der Zivilgesellschaft, Stellungnahme, S. 5.

3.2. Challenges of § 126a StGB during Investigations

Through so-called “online patrols,” permanent investigative units of the federal states independently search the internet for content subject to investigation.⁴⁶ Despite their efforts to investigate criminal content, a large number of crimes remain unsolved.⁴⁷ The main difficulty in investigations is the anonymity of perpetrators, the use of fake accounts, and complex server structures such as TOR, gray zone hosting, and VPNs.⁴⁸ These technologies allow users to regularly change IP addresses within a short period, conceal their identities, and hide their physical locations.⁴⁹

These techniques complicate not only the identification and prosecution of offenders and the collection of relevant evidence but also the recording and evaluation of information.⁵⁰ Considering these challenges, the Federal Criminal Police Office (BKA) demands legislative regulations that would make it possible, in exceptional cases, to deanonymize users of the TOR platform.⁵¹

Another problem is the dissemination of information from foreign servers, as the scope of European authorities’ actions is limited on an international level.⁵² An example of this is a racist organization from the USA whose data was disseminated via a server located in China and used by neo-Nazis in Germany.⁵³

3.3. Insufficient Information

The Federal Criminal Police Office (BKA) does not have a unified strategy regarding when and in what form individuals named in the so-called “enemy lists” should be informed.⁵⁴ Some federal states, such as Hesse and Thuringia, act proactively and provide information to the affected individuals, while other states leave this decision to the local police authorities. As a result, individuals often receive no information at all or receive it only belatedly. Consequently, they lose the opportunity to take timely protective measures and frequently remain unprotected.⁵⁵

4. Conclusion

The Georgian legislation, especially in the years 2024-2025, in the context of increasing dissemination of personal data and the resulting rise in intimidation, harassment, and physical violence, requires the establishment of appropriate legal frameworks. In this context, § 126a of the German Criminal Code (StGB) represents a significant step forward in combating the dangers posed by the public dissemination of personal data and contributes to the protection of public peace.

⁴⁶ Patz J., KriPoZ 4 | 2021, S. 223, 229.

⁴⁷ Polizeiliche Kriminalstatistik Straftatenkatalog 2023, S. 53.

⁴⁸ Wuttke S., Stellungnahme, S. 5.

⁴⁹ Ceffinato T., JuS 2020, S. 495

⁵⁰ Wuttke S., Stellungnahme, S. 5.

⁵¹ Thiesen M., MMR 2014, S. 803, 808.

⁵² Deusch F./Eggendorfer T., in Taeger/Pohle, ComputerR-HdB, 50.1 IT-Sicherheit, Rn. 272, 279, 280a.

⁵³ DJG, Stellungnahme, S. 2; Patz J., KriPoZ 4 | 2021, S. 223, 226.

⁵⁴ BT-Drs. 19/3628, S. 4.

⁵⁵ VBRG, Stellungnahme, S. 3

Nevertheless, it is necessary to define the boundary between freedom of expression and punishable actions, so that the potential impact on journalistic activities and freedom of expression is minimized. At the same time, in order to achieve the set goals, security agencies must ensure the effective application of data protection regulations and timely provide detailed information to the affected individuals about potential threats, enabling them to assess risks and take protective measures.

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