

Brief Report on National Security Law

(June – August 2020)

FOCUSES



Freedom of Speech



Right to Bail



Freedom of Movement



Press Freedom

Brief Report on National Security Law (June – August 2020)

Introduction

1. This brief report provides a snapshot of the first two months after the enactment of the National Security Law (“NSL”) – which targets offences of secession, subversion, terrorism and collusion with foreign forces – on 30 June in Hong Kong. News and information gathered from the media were verified and analysed to identify human rights concerns brought by the law. Three key areas of observation are highlighted below, followed by two appendices that contain details of the arrested and wanted persons, and the visible impacts of the NSL on the civil society.

Overview

2. From 30 June to 31 August, at least 21 people were arrested under the NSL while only one was charged¹. Eight others were wanted. They include pro-democracy activists, former legislators and an owner of a media outlet (for details, see Appendix I).
3. The law has been strongly criticised as a draconian law. Definitions of the offences are overly broad and vague, and powers of the Hong Kong Police Force are expanded under the law. The manner of how the police have been enforcing and implementing the NSL gave rise to a worrying trend of closing civil space at multiple dimensions. Below are some significant examples (for details, see Appendix II):

Political participation – At least five political parties which had advocated self-determination or independence of Hong Kong were disbanded or suspended local operation on the same day the law came into force;

Public assembly – At least 11 protesters were arrested for displaying or possessing stickers and banners with political slogans;

Press – Apple Daily, a pro-democracy media outlet, was raided by over 200 police officers following the arrest of its owner. Police allegedly seized journalistic materials in the operation which exceeded the scope of the warrant;

Private sectors – Naver, the New York Times, the American Political Science Association, had decided to relocate part of their offices and workshop to other regions amid concerns over privacy, press freedom and academic freedom after the passage of the law.

4. Civil Rights Observer, a local human rights organisation, observes a severe chilling effect the NSL with sentences up to life imprisonment has imposed on the civil society, which appears to be an intended consequence welcomed by the government.² The noticeable discrepancy in numbers between the arrested and the charged also suggests the law is applied, if not designed, to intimidate citizens. Its breadth in definition is open to politically motivated prosecutions and other forms of

¹ According to news reports, only Tong Ying-kit’s case had entered judicial proceedings; others were released on bail without charge. For details, see Appendix I.

² In separate interviews with the media, Chief Executive Carrie Lam and the Commissioner of Police Chris Tang Ping-keung both described the law has brought a “deterrent effect” to the city.

manipulation, violating various fundamental human rights – freedom of expression, freedom of assembly and association, freedom of movement and freedom of press – all enshrined in the International Covenant on Civil and Political Rights (“**ICCPR**”). At least seven countries³ suspended mutual legal assistance and extradition treaties with Hong Kong citing adverse human rights implications of the NSL.

Key Observations

Freedom of expression, assembly and association under attack

- Lodging disproportionate charges against dissent

5. A motorcyclist, who carried a flag with the slogan “Liberate Hong Kong, revolution of our times”⁴ during the July 1 protest, was charged with terrorism⁵ for crashing into police officers and could be sentenced to life imprisonment if convicted. Alternative charges – such as causing grievous bodily harm by dangerous driving (section 36A of the Road Traffic Ordinance Cap. 374), dangerous driving (section 37 of the Road Traffic Ordinance Cap. 374) and injuring person by furious driving (section 33 of the Offences against the Person Ordinance Cap. 212) – were used to tackle similar offence in the past, with a maximum imprisonment of 7 years, 3 years and 2 years on conviction.⁶
6. While the government opted for an aggravated charge, the legal grounds and justifications of the severity of the case put forward are questionable. The use of anti-terrorism legislation to regulate protest in Hong Kong has been a concern of the UN Special Rapporteurs, who urged for an increased specificity in the definition of terrorism. As they mentioned, the core emphasis of terrorist acts in the UN Security Council Resolution 1566 and international treaties is the targeting of civilians⁷ that intentionally cause death or serious bodily harm to provoke a state of terror.⁸ For merely local or relatively isolated threats to law and order, national security shall not be invoked as a reason for imposing limitations⁹, including those in the name of anti-terrorism.
7. It is of our view that the prosecution of the current case, enabled by imprecise and far-reaching definitions of crimes under the new law, risks encompassing conduct that goes beyond the scope of terrorism and thereby is incompatible with the principle of legality and proportionality.¹⁰

³ Including Canada, Australia, the UK, New Zealand, Germany, France and the US.

⁴ One of the most popular slogans of the anti-extradition bill protests. The Hong Kong government declared the slogan connotes Hong Kong independence, secession or subversion. Available at: <https://www.info.gov.hk/gia/general/202007/02/P2020070200869.htm>

⁵ He also faced the allegation of inciting secession for flying the flag.

⁶ E-Legislation, Cap. 374 Road Traffic Ordinance, section 37. Available at: https://www.elegislation.gov.hk/hk/cap374?xid=ID_1438403114943_001

⁷ UN Special Rapporteurs, Communication no. CHN 7/2020 on Anti-Terrorism Law and Sedition Law.

⁸ UN Special Rapporteurs, Communication no. CHN 17/2020 on National Security Law; UN Security Council, Resolution 1566 adopted on 8 October 2004. S/RES/1566, para. 3.

⁹ The Siracusa Principles on the Limitations and Derogation Provisions in the ICCPR, para. 29.

¹⁰ Report of the Special Rapporteur on the promotion and protection of human rights while countering terrorism, Martin Scheinin, UN General Assembly. A/61/267, para. 32-33.

- Criminalising peaceful and legitimate expression
8. Including the motorcyclist, ten protestors were arrested on July 1, the first day the law came into effect. Several of them were accused of inciting secession and subversion for displaying or possessing banners and stickers with political slogans that the authority considers connotating separatism, such as “Hong Kong independence”, “Liberate Hong Kong, revolution of our times” and “One nation, one Hong Kong”. Without committing or posing a threat to commit violent acts, the arrestees could face up to 10 years imprisonment.
 9. A new purple flag warning protestors of “displaying flags or banners/ chanting slogans... with an intent such as secession or subversion, may constitute offenses” is deployed by the police force to enforce the new law. Dispersal, arrest, stop-and-search operations were conducted following the display of the flag in at least seven events from June to August. It is worrying that the crime of incitement specified in the purple flag would be used as a pretext to disperse assembly and stifle free speech.
 10. The UN Special Rapporteurs have repeatedly cautioned the legal terminology of incitement must be narrowly defined to prevent over-inclusion of legitimate expression.¹¹ Governments must “establish a direct and immediate connection between the expression and the threat”, as the UN Human Rights Committee indicated.¹² In *Brandenburg v. Ohio* (1969), the Supreme Court of the United States ruled that the failure of the law to distinguish between advocacy and incitement to imminent lawless action jeopardizes the right to freedom of speech. Abstract discussions should be differentiated from substantial acts of preparing or inciting individuals to engage in illegal acts.¹³
 11. Holding or possessing flags with messages critical of the regime could hardly cause or provoke any real threats to society. Rather, it is a peaceful expression or reflection of one’s political will. The Siracusa Principles prohibit the government from invoking “national security as a justification for measures aimed at suppressing opposition or to justify repressive practices against its population.”¹⁴ Also, measures under the label of protecting national security are only allowed when adequate safeguards and effective remedies against abuse exist.¹⁵

Restriction of the freedom of movement

- A higher degree of police discretion on passport seizure
12. In most national security cases, arrestees have been subjected to stringent bail conditions, at least 10 arrested¹⁶ for offences under the NSL were required to hand

¹¹ CHN 17/2020; CHN 7/2020.

¹² Human Rights Committee, General comments no. 34. CCPR/C/GC/34, para. 34-35.

¹³ *Brandenburg v. Ohio*, 395 U.S. 444 (1969). The Court used a two-pronged test to evaluate laws affecting speech acts: 1. speech can be prohibited if its purpose is to incite or produce imminent lawless action; and 2. doing so is likely to incite or produce such an action. Available at:

<https://supreme.justia.com/cases/federal/us/395/444/#tab-opinion-1948083>

¹⁴ The Siracusa Principles on the Limitations and Derogation Provisions in the ICCPR, para. 32.

¹⁵ *Ibid*, para. 31.

¹⁶ On.cc, 2020. Police first applied for court order barring 4 suspects from leaving Hong Kong for six months (Chinese only). Available at: https://hk.on.cc/hk/bkn/cnt/news/20200731/bkn-20200731100813120-0731_00822_001.html; The Standard, 2020. Jimmy Lai, Agnes Chow released on bail. Available at: <https://www.thestandard.com.hk/breaking-news/section/4/152929/Jimmy-Lai,-Agnes-Chow-released-on-bail>;

over travel documents therefore barring them from leaving Hong Kong during the coming six months, despite they are under investigation and no prosecutions have been made.

13. Before the NSL, the criminal procedure in general allows passport seizure at the stage of prosecution in serious cases if at high risks of absconding. Article 43 of the NSL and the accompanying Implementation Rules¹⁷, in contrast, empower police officers to seek the magistrate to order suspects being investigated to surrender their travel documents up to nine months. Such restriction to the freedom of movement of a person should be safeguarded under strict scrutiny and limited to exceptional circumstances. As the UN Human Rights Committee noted¹⁸, the freedom of movement enshrined in Article 12 of the ICCPR is an “indispensable condition for the free development of a person”.
14. Although the Prevention of Bribery Ordinance (Cap. 201) provides for a similar restriction, the request of surrendering travel document of a suspect can only be made by the Commissioner of the Independent Commission Against Corruption, while police officers of all ranks are empowered to apply for such request under the NSL. Given the ill-defined offences of the new law, the further expansion of law enforcements’ discretionary powers with much less scrutiny raises concerns of leaving leeway for unreasonable deprivation of one’s liberty.
 - “No bail” provision deviating from presumption of innocence
15. Article 42 of the law states that no bail shall be granted unless the judge has sufficient grounds for believing the suspect or defendant will not continue to commit acts in endanger to national security.
16. The provision was first used to reject the bail plea by Tong, the motorcyclist, considering his risk of re-offending in the recent Habeas Corpus case¹⁹ and the corresponding bail court judgement.²⁰ Designated judges²¹ for handling national security law cases described the implication of Article 42 on rejecting bail is “more apparent than real”. It should not be read as imposing “any absolute prohibition against bail”.
17. Notwithstanding that, the article, on the face of it, deviates from the city’s constitutional rights on the presumption of innocence by shifting the burden of proof to defendants. Suspects are required to prove themselves not breaching the law during the bail period for a bail to be granted, as opposed to the doctrine under

RTHK, 2020. Wilson Li: arrested and made to surrender travel documents (Chinese only). Available at: <https://news.rthk.hk/rthk/ch/component/k2/1543204-20200812.htm?spTabChangeable=0>

¹⁷ HKSAR Government, 2020. Implementation Rules for Article 43 of the Law of the People's Republic of China on Safeguarding National Security in the Hong Kong Special Administrative Region gazetted. Available at: <https://www.info.gov.hk/gia/general/202007/06/P2020070600784.htm>

¹⁸ Human Rights Committee, General Comment No. 27. CCPR/C/21/Rev.1/Add.9.

¹⁹ *Tong Ying Kit v. HKSAR*, HCAL 1601/2020, [2020] HKCFI 2133.

²⁰ *HKSAR v. Tong Ying Kit*, HCCP 463/2020, [2020] HKCFI 2196, para. 12. Available at:

https://legalref.judiciary.hk/lrs/common/search/search_result_detail_frame.jsp?DIS=130396&QS=%2B&TP=JU

²¹ Article 44 of the National Security Law states that the Chief Executive shall designate judges to handle cases concerning offence endangering national security.

common law in which prosecutors are responsible for justifying the lawfulness of detention.

18. This arguably radical change on the conditions of bail permission may result in arbitrary detention. Amid there is a legal provision in support of it, the UN Human Rights Committee confirmed that the criterion of lawfulness alone is not enough. Other elements of the in-principle “lawful” detention – inappropriateness, injustice, lack of predictability of the relevant provisions, and due process of law – should also be considered to determine whether the custody is reasonable and necessary.²²

Press freedom threatened

19. Apple Daily, a major pro-democracy local newspaper known for its critical stance toward the Hong Kong SAR and the Chinese government, has been targeted under the new law. Its owner Jimmy Lai together with four other members of the outlet and Lai’s sons were accused of collusion with foreign forces and conspiracy to defraud. Following the arrests, more than 200 police officers raided the editorial office and searched journalistic materials which were not covered by the warrant. Apple Daily had sought an Interim Injunction Order against the search to ban police officers from reading any materials seized.
20. On the same day, as news reported²³, police officers with a court order discreetly visited the local newsroom of Nikkei – a Japanese financial newspaper, in relation to an advertisement placed by Demosistō a year ago calling for international support for pro-democracy protests in Hong Kong. Agnes Chow, former co-founder of Demosistō, was arrested later the day for collusion with foreign forces.
21. The search and seizure of journalistic materials have always been highly sensitive as demonstrated in both local and oversea court cases. Any interference with the right to protection of news sources, including searches at journalists’ workplace and seizures of journalistic materials, must be justified by an overriding requirement in the public interest.²⁴ Only when there is a “real risk” that the journalistic material will be hidden or destroyed could a search warrant be issued.²⁵ Under circumstances in which authorities were unable to establish a connection between the journalists and the implicated offences, the European Court of Human Rights held that are not “sufficient” to justify large scale searches at journalists’ homes and their workplace.²⁶
22. Likewise, without a further explanation of the charges and clear reasons for the searches, the police’s action in both news agencies could amount to harassment and unavoidably cause a chilling effect on the press and their sources of information.

²² *Albert Womah Mukong v. Cameroon*, CCPR/C/51/D/458/1991, para. 9.8. Available at:

http://www.worldcourts.com/hrc/eng/decisions/1994.07.21_Mukong_v_Cameroon.htm

²³ AFP, 2020. Hong Kong police visit local newsroom, sift through past – despite security law being non-retroactive. Available at:

<https://hongkongfp.com/2020/08/28/hong-kong-police-visit-local-newsroom-sift-through-past-despite-security-law-being-non-retroactive/>

²⁴ Council of Europe, 2018. The Protection of Journalistic Sources, a Cornerstone of the Freedom of the Press. Available at: <https://rm.coe.int/factsheet-on-protection-of-sources-june2018-docx/16808b3dd9>

²⁵ Legislative Council of the HKSAR, 2004. Recent judgements on the powers of the Independent Commission Against Corruption to search for and seize journalistic material (LC Paper No. LS14/04-05), para. 14.

²⁶ *Ernst and Others v. Belgium*, application no. 33400/96 (2003). Available at:

<http://hudoc.echr.coe.int/eng-press?i=003-795697-812799>

Penalisation of media outlets or journalists solely for being critical of the government is never a necessary restriction of freedom of expression.²⁷ The restrictions employed must, at all times, be reasonably proportionate to the legitimate aims pursued to ensure press freedom.

About Civil Rights Observer

Established in 2014, the Civil Rights Observer works to protect and promote civil and political rights in Hong Kong, with a focus on police abuse of powers. The four pillars of our work are: human rights education, police power monitoring, policy advocacy, and emergency human rights support. More information available at: <https://www.hkcro.org/>.

Contact: info@hkcro.org

Website: www.hkcro.org

²⁷ CCPR/C/GC/34, para. 42.

Appendix I – List of Arrested and Wanted Persons under National Security Law*

| Date | Involved Person | Alleged Charges | Description |
|-----------------|--|--|--|
| Charged | | | |
| 1/7/2020 | Tong Ying-kit | Terrorism; Inciting secession | During an annual protest marking the anniversary of the city's handover, Tong was arrested and prosecuted for committing terrorist activities and inciting secession by driving a motorcycle into the police cordon while flying a "Liberate Hong Kong, revolution of our times" banner. |
| Arrested | | | |
| 1/7/2020 | 9 protestors | Secession; Inciting secession; Inciting subversion | 9 others, including a 15-year-old girl, were also arrested in the 7.1 protest for displaying or carrying materials considered advocating independence or other political messages by the authority. |
| 21/7/2020 | Rayman Chow | Unknown | In a dispersal operation of a protest on the anniversary of the 7.21 incident, District Councillor Rayman Chow was arrested for holding a sign with the slogan "Liberate Hong Kong, revolution of our times". He was allegedly released on bail without charge after detained for 20 hours. |
| 29/7/2020 | Tony Chung Ho Nok-hang Yanni Ho Chan Wai-yan | Secession; Inciting secession | Four former members of Studentlocalism – disbanded after the law was enforced – were accused of inciting secession for advocating Hong Kong independence on a social media group. They were released on bail without charge after 48-hour detention, were asked to surrender their passports and were required to remove messages from the group. |
| 10/8/2020 | Jimmy Lai Ian Lai Royston Chow Agnes Chow Wilson Lee Andy Li | Collusion with foreign forces | Police sources accused Agnes Chow, Wilson Lee and Andy Lee of involving in the "Fight for Freedom, Stand with Hong Kong" campaign, which had encouraged international sanctions on Hong Kong, with financial support provided by the other 3 via overseas bank accounts. They were released on bail the day after and were asked to surrender their passports. Some of their bank accounts and assets had been frozen. Andy Li was later confirmed as one of the 12 persons detained by the Chinese Coast Guard on 23 August for fleeing to Taiwan illegally. According to the Chinese criminal law, ringleaders who organise people to secretly cross a national border could be sentenced to life imprisonment. |
| Wanted | | | |
| 30/7/2020 | Nathan Law Simon Cheng Wayne Chan Ray Wong Honcques Laus Samuel Chu | Inciting secession; Collusion with foreign forces | 6 activists living in exile abroad were allegedly wanted on suspicion of foreign lobbying, attending hearings, calling for international sanctions, and supporting Hong Kong independence. Among them, Samuel Chu was a US citizen, raising a concern that the law would be used to target a non-Chinese citizen for lobbying his own government. |
| 10/8/2020 | Mark Simon | Collusion with foreign forces | Mark Simon, an aide of Jimmy Lai and a US citizen, was allegedly wanted. |
| 11/8/2020 | Lau Cho-dik | Unknown | Lau is the spokesperson for "Fight for Freedom, Stand with Hong Kong". The group had lobbied foreign politicians and funded the All-Party Parliamentary Group (APPG) which published a report urging the UK government to impose sanctions on officials deemed responsible for human rights violations. |

*The information gathered from news reports above is by no means exhaustive.

Appendix II – Impacts on Civil Society under National Security Law*

| Sector | Key Implication |
|--------------------|---|
| Political | <ul style="list-style-type: none"> - At least 5 political parties who had advocated self-determination or independence of Hong Kong were disbanded or suspended local operation, including Demosistō¹, Studentlocalism, Hong Kong National Front, Hong Kong Higher Institutions International Affairs Delegation (HKHIIAD)², Victoria Social Association³. - Pro-democracy activist Nathan Law had fled the city shortly after the law came into effect⁴, and declared to sever his relationship with his family after he was put on the wanted list⁵. - Election candidates were disqualified for opposing the National Security Law, soliciting foreign intervention and vetoing budgets⁶. |
| Press | <ul style="list-style-type: none"> - Police raid on Apple Daily⁷ and Nikkei⁸, allegedly seizing journalistic materials. Only “trusted media” depending on their past performance could enter the cordoned-off area; news agencies such as Reuters, AP, Stand News were kept outside. - The New York Times announced to move one-third of its Hong Kong staff to Seoul⁹. - Unusual delays and denials in renewing or securing work visas for foreign journalists, the applications were suspected to be handled by a new national security unit within the Immigration Department¹⁰. |
| Arts & Publication | <ul style="list-style-type: none"> - Comic artists’ columns on Ming Pao Weekly was discontinued. Ar To, one of whom, had been reminded of his comics might breach the law¹¹. - Books written by pro-democracy figures, including Joshua Wong and Tanya Chan, were removed from public libraries pending a review into whether the content violates the law¹². |

¹ RTHK, 2020. Demosisto disbands as political groups run for cover. Available at: <https://news.rthk.hk/rthk/en/component/k2/1534917-20200630.htm>

² Hong Kong Higher Institutions International Affairs Delegation, 2020. Available at: <https://www.facebook.com/HKHIIAD/photos/a.110615073605933/295214868479285/?type=3&theater>

³ SCMP, 2020. Future of city’s localist movement hangs in balance as groups disband, activists quit or flee city. Available at: <https://www.scmp.com/news/hong-kong/politics/article/3091183/hong-kong-national-security-law-future-citys-localist>

⁴ The Guardian, 2020. Hong Kong activist Nathan Law moves to Britain and vows fight will continue. Available at: <https://www.theguardian.com/world/2020/jul/14/hong-kong-activist-nathan-law-moves-to-britain-and-vows-fight-will-continue>

⁵ Nathan Law, 2020. “I have also stopped contacting members of my family. From now on I’ll sever my relationship with them.” Available at: <https://twitter.com/nathanlawkc/status/1289228657123196930?s=21>

⁶ The StandNews, 2020. 12 HK pro-democracy figures disqualified from running in Legco election. Available at: <https://www.thestandnews.com/politics/12-hk-pro-democracy-figures-disqualified-from-running-legco-election/>

⁷ SCMP, 2020. As Hong Kong police raid Apple Daily offices, publication’s live feed allows world to watch drama unfold. Available at: <https://www.scmp.com/news/hong-kong/law-and-crime/article/3096812/hong-kong-police-raid-apple-daily-offices-publications>

⁸ AFP, 2020. Hong Kong police visit local newsroom, sift through past – despite security law being non-retroactive. Available at: <https://hongkongfp.com/2020/08/28/hong-kong-police-visit-local-newsroom-sift-through-past-despite-security-law-being-non-retroactive/>

⁹ New York Times, 2020. New York Times Will Move Part of Hong Kong Office to Seoul. Available at: <https://www.nytimes.com/2020/07/14/business/media/new-york-times-hong-kong.html>

¹⁰ HKFP, 2020. Visas ‘weaponised’: Gov’t denies Hong Kong Free Press editor a work visa, without explanation, after 6-month wait. Available at: <https://hongkongfp.com/2020/08/27/visas-weaponised-govt-denies-hong-kong-free-press-editor-a-work-visa-without-explanation-after-6-month-wait/>

¹¹ The StandNews, 2020. Ming Pao Weekly comics completely removed. Unwilling to be deprived of my due rights by those in power: comic artist. Available at: <https://bit.ly/2G69vME>

¹² SCMP, 2020. National security law: Hong Kong libraries pull books by some localist and democracy activists for review. Available at: <https://www.scmp.com/news/hong-kong/politics/article/3091842/national-security-law-hong-libraries-pull-books-some>

| | |
|------------------|---|
| Education | <ul style="list-style-type: none"> - The Education Bureau notified all schools, including kindergartens and special schools, to incorporate the law into the current curriculum¹³. - The Secretary for Education said activities containing political messages in schools, such as singing and chanting slogans, should be banned¹⁴. - Removal of the phrase “separation of powers” in Liberal Studies textbooks following a voluntary screening conducted by the bureau, which raised concerns over political censorship¹⁵. |
| Academic | <ul style="list-style-type: none"> - Workshop by the American Political Science Association (APSA) will be relocated to Seoul citing worries of the potential limitation on academic freedom under the law¹⁶. |
| Digital privacy | <ul style="list-style-type: none"> - Citizens deleting their social media accounts and post history in fear that any sensitive material could fall foul of the new law. - Search rate of VPN service surged by 3000% in Hong Kong, revealed by ProtonVPN¹⁷. - South Korean tech company Naver relocated its data back-up centre from Hong Kong to Singapore¹⁸. - Tech companies such as Facebook, Google and Twitter, had suspended to process requests for user data from the Hong Kong SAR government¹⁹. - Google further stopped directly responding to data requests from Hong Kong authorities and redirected the requests through the Mutual Legal Assistance with the US²⁰. |
| Local businesses | <ul style="list-style-type: none"> - Multiple pro-democracy merchants have taken down their “Lennon Wall” displays expressing support for the protests after some were warned by the police that they might violate the law²¹. |

*The information gathered from news reports above is by no means exhaustive.

¹³ The Standard, 2020. National security law to be introduced to students. Available at: <https://www.thestandard.com.hk/breaking-news/section/4/149857/National-security-law-to-be-introduced-to-students>

¹⁴ New York Times, 2020. Hong Kong Bans Protest Song and Other Political Expression at Schools. Available at: <https://www.nytimes.com/2020/07/08/world/asia/hong-kong-students-protests-china.html>

¹⁵ Apple Daily, 2020. Education Bureau removes text about separation of powers, raises censorship concerns. Available at: <https://hk.appledaily.com/news/20200819/BQFTSXVZXRANRHL2J7WX4G3XWU/>

¹⁶ The American Political Science Association, 2020. Available at: <https://connect.apsanet.org/asia/2020-workshop/>

¹⁷ ProtonVPN, 2020. Help us defend democracy and freedom in Hong Kong. Available at: <https://protonvpn.com/blog/hongkong/>

¹⁸ SCMP, 2020. National security law: Naver moves data centre from Hong Kong to Singapore. Available at: <https://www.scmp.com/week-asia/politics/article/3094084/national-security-law-naver-moves-data-centre-hong-kong>

¹⁹ Wall Street Journal, 2020. Google, Facebook and Twitter Suspend Review of Hong Kong Requests for User Data. Available at: <https://www.wsj.com/articles/whatsapp-to-suspend-processing-law-enforcement-requests-for-user-data-in-hong-kong-11594034580>

²⁰ Reuters, 2020. Google stops responding directly to data requests from Hong Kong government. Available at: <https://www.reuters.com/article/us-hongkong-google-data-idUSKCN25A0HU>

²¹ RTHK, 2020. 'Yellow restaurant told to remove Lennon Wall'. Available at: <https://news.rthk.hk/rthk/en/component/k2/1535430-20200702.htm>