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TikTok, Digital Sovereignty and Geopolitics: Analysing The 2020 TikTok Ban in India as A Geopolitical Instrument

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Index

List of Abbreviations

5G	Fifth Generation
AI	Artificial Intelligence
ADPPA	American Data Privacy and Protection Act
AUKUS	Australia-United Kingdom-United States
BJP	Bharatiya Janata Party
BRI	Belt and Road Initiative
CCP	Chinese Communist Party
CERT-IN	Computer Emergency Response Team - India
CPEC	China-Pakistan Economic Corridor
CSIS	Center for Strategic and International Studies
CSOs	Civil Society Organizations
DMA	Digital Markets Act
DSA	Digital Services Act
DSDBO	Darbuk–Shyok–DBO Road
DSL	Data Security Law
EU	European Union
G20	Group of Twenty
GDP	Gross Domestic Production
GPS	Global Positioning System
HR	House Resolution
IP	Internet Protocol
IT	Information Technology
JAM	Jan Dhan-Aadhaar-Mobile
LAC	Line of Actual Control
MAC	Media Access Control
MEPs	Members of the European Parliament
MSG	Multi-Stakeholder Internet Governance
NLP	National Liberal Party
NSL	Network Security Law
OCI	Oracle Cloud Infrastructure
PIPL	Personal Information Protection Law
PRC	People's Republic of China
QUAD	Quadrilateral Security Dialogue
SSIDs	Service Set Identifiers
UDHR	Universal Declaration of Human Rights
UK	United Kingdom
UN	United Nations
UPI	Unified Payments Interface
US	United States
USDS	TikTok US Data Security
Wi-Fi	Wireless Fidelity
WTO	World Trade Organization

Abstract

It would be unthinkable to deny that, in today's digital and hyper-connected world, social platforms do not hold a key position in the great geopolitical arena. The rise of social media, especially TikTok, in contemporary history has meant new dynamics and a new approach to the study of the interplay between geopolitics and technology. More precisely, today we talk about digital geopolitics[1] to highlight the overlap between international relations and digital technologies. Indeed, with the advent of new technologies, the geopolitical landscape has been transformed and new challenges and opportunities have emerged for states. Originally designed as a short video-sharing app for entertainment, TikTok soon abandoned its primary function, quickly gaining popularity and emerging as a global phenomenon with billions of active users per month. While the app has quickly achieved worldwide success, the platform's Chinese origins, in a market dominated mainly by US apps, raised serious concerns about data security and potential political manipulation by the Chinese government[2]. These international controversies soon led to significant geopolitical pressures, as demonstrated by the 2020 Indian case where TikTok and 58 other Chinese apps were banned following clashes on the India-China border[3]. This thesis aims, thus, to analyse the multifaceted role that TikTok has recently assumed in the international geopolitical scene, using the Indian case as a model of analysis. Navigating in a context increasingly dominated by the importance of digital sovereignty, this research will demonstrate how the international ban on TikTok is not only the cause of a technological threat, but also a strategic geopolitical move to counter China's growing influence, offline and online. Therefore, the research question that drives this thesis is to determine whether and how TikTok has become a geopolitical instrument in today's international scenario and to outline what dynamics have led to this shift in the global technological order and beyond. Through this analysis, we then try to call attention to the evolution of the digital landscape, highlighting how apps like TikTok can become major players in the global framework, able to shape and affect international relations, security policies and the balance of power between countries. Finally, the study also aims to create a knowledge base and model from which to predict the upcoming regulatory challenges that TikTok will face and the implications for the global digital order.

Keywords

TikTok, Digital Sovereignty, India, Sino-Indian Relations, Geopolitics, Data Security

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[1] Nisar, R. D. (2023). Digital – Geopolitics: A New Concept in International Relations. World Geostrategic Insights.
[2] Wu., J. (2021). Study of a Video-sharing Platform: The Global Rise of TikTok. Massachusetts Institute of Technology.
[3] Press Information Bureau, Government of India (2020). Government Bans 59 mobile apps which are prejudicial to sovereignty and integrity of India, defence of India, security of state and public order.

INTRODUCTION

The geopolitical dilemma to be analysed starts from a simple app, which we all know today as TikTok. This one, born with the sole purpose of sharing short videos between users and creating content of all kinds, is however the international version of its Chinese sister Douyin, owned by the well-known company ByteDance, based in Beijing[4]. Although having comparable characteristics and purposes, both differ in terms of different policies, content, platforms and registration methods[5]. Yet, TikTok, or Douyin depending on which hemisphere the reader lives, had another name, perhaps most remembered by the previous generation, namely Musical.ly. The latter, undisputed technological queen of lip-sync videos, was purchased by ByteDance in 2017 and then unified with today's TikTok only in August 2018. Fruitful action that had to wait only two years, with the arrival of Covid-19, to reach its highest point in terms of success, when people were forced to stay at home and find a sociality only in the online world. The popularity of a non-American app is evident. TikTok has become a worldwide phenomenon gaining over 1 billion active users around the globe and, in fact, as of 2023 it had about 1.8 billion per month[6], the majority of whom is composed by the next ruling class, namely Millennials[7] and Generation Z[8].

"TikTok, a Chinese video app, brings the fun back to social media"[9], in this way was initially described the app with joyful and light content that, unlike the usual applications, had been able to bring playfulness and carefree especially in a dark period for humanity as the Covid-19. This was given thanks to its technology based on data collection methods and Artificial Intelligence (AI) which, in contrast to the other apps that show content based on contacts with other users (followers and followed), the "ForYou" feed of each account is able instead to show more and more engaging videos based on our personal interaction with the content shown[10], making the virtual experience personal and irresistible. Having said that, the question arises. How is it possible that an app, seemingly harmless and with a benevolent purpose, can become the subject of a controversial study of geopolitical analysis and regulated by global security actions? The answer to this question is soon given. In a short time, as the app has been on the rise in the world's smartphones, the issue has become increasingly politicized. Governments around the world were beginning to fear a technological threat

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[4] ByteDance (n.d.). Our Products: Discover our suite of products and services.
[5] Pellaeon, L. (2021). TikTok vs Douyin: A Security and Privacy Analysis. Citizen Lab Research Report No. 137, University of Toronto.
[6] Aslam, S. (2023). TikTok by the numbers: Stats, demographics & fun facts. Omnicore.
[7] Oxford Learner's Dictionaries. Millennials: "a person who was born between the early 1980s and the late 1990s".
[8] Oxford Learner's Dictionaries. Generation Z: "the group of people who were born between the late 1990s and the early 2010s, who are regarded as being very familiar with the internet".
[9] Rose, K. (2018). TikTok, a Chinese video app, brings the fun back to social media. New York Times.
[10] TikTok Newsroom (2020). How TikTok recommends videos #ForYou.

behind an apparently harmless facade, which we could metaphorically compare to a Trojan horse. As a cascade of events, little by little, the app of entertainment TikTok, was inserted in the top list of enemies of many countries. Among these, the most striking case occurred in India. In June 2020, the two Asian giants, China and India, following continuous skirmishes on the Himalayan border, culminated in a severe dispute, which ended with a definitive ban of TikTok and 58 other Chinese apps by the Indian government[11]. The latter was requested by the Ministry of Information Technology invoking Section 69A of the Information Technology Act which could block activities "prejudicial to sovereignty and integrity of India, defence of India, security of state and public order"[12]. Like any cascade of events, the case of India was only the first example of how TikTok unleashed international cyber and security concern. The case studies that followed are in fact what has aroused my interest in the topic, as the media and governments geographically and culturally close to me have increasingly shown interest in limiting TikTok. In fact, the first case that followed the footsteps of the Indian giant were the United States, its great ally in the balance of the global order. During the year of 2020, the United States introduced what was called the No TikTok on Government Devices Act (S. 3455)[13], then signed and made law in December 2022 by President Joe Biden[14]. The concern about privacy and data protection risks from the US soon influenced other countries, media and public opinion, including the one that sparked my interest in the topic. In February 2024, the European media reported that the European Commission and EU Council had prohibited TikTok on staff members' devices. Only the following week, the European Parliament also followed the steps of the two institutions, moved by a growing discomfort and apprehension towards the collection of data and hypothetical promotion of its own interests by the Chinese government[15]. It seems an unstoppable and irreversible action that is happening in the various countries, so much that shortly after even the Chief Information Officer of Canada[16] and the Danish Ministry of Defence[17] announce the ban of the app on government-provided devices. Consecutively, in March 2023, the Belgian prime minister De Croo also bans government mobile devices, as according to the National Security Council the app "is required to cooperate with Chinese intelligence services"[18]. The same thing happened in the UK, adding that the measure aimed to examine the vulnerability and associated risks to government and

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[11] Travelli, A. & Raj, S. (2024). What Happened When India Pulled the Plug on TikTok. The New York Times.
[12] Ministry of Electronics & IT (2020). Government Bans 59 mobile apps which are prejudicial to sovereignty and integrity of India, defence of India, security of state and public order.
[13] Congress.Gov (2020). S.3455 - No TikTok on Government Devices Act.
[14] Allyn, B. (2022). Biden approves banning TikTok from federal government phones. NPR.
[15] Chee, F. (2023). European Parliament latest EU body to ban TikTok from staff phones. Reuters.
[16] Gillies, R. (2023). TikTok banned on all Canadian government mobile devices. AP news.
[17] AP News, (2023). Danish defense ministry bans TikTok on employee work phones.
[18] Reuters (2023). Belgium bans TikTok from federal government work phones.

sensitive data through the use of certain digital platforms[19]. The wave of bans continued in the Netherlands[20] and in Norway[21], where there was increasing fear of the risk of espionage by the Chinese government and, as far as the Australian authorities were concerned, for national security reasons related to data collection[22].

To resume the question just asked, it seems that the narrative has played a central part in the perception of TikTok by governments around the globe: from simple entertainment apps to primary threat to international security. At first glance, this superficial and introductory modern geopolitical tale seems to suggest that "the narratives are the foundation and can shape public policy"[23]. Yet, to be able to affirm this, it takes a careful analysis of the actions and the various bans that have been placed on TikTok, since their speed and development are unprecedented. The case, however, recalls concerns raised in the past for platforms like Facebook and Cambridge Analytica, accused of having influenced the 2016 presidential election and the Brexit[24]. Although TikTok has never been involved in a similar media or judicial process, nor has it ever been established that there is a direct threat to governments from the Chinese government, there has been an increase in concern and such a rapid political reaction that the answer should be sought in the internal narrative of each government involved. This study aims not so much to ascertain the actual technological threats posed by the profiling processes and data collection of the Chinese application, but rather to demonstrate how the international ban on TikTok is a real geopolitical and political narrative tool to counter China's rise, not only in the offline world but especially in the online realm, which increasingly influences the most concrete and daily realities. The research, driven by an interest in recent events in the US and Europe and the aim of demonstrating the interaction and correlation between media and geopolitics, uses a recent and concluded case study to analyse the topic. The analysis focuses on the Indian case of 2020, in order to delve into the causes and consequences of a geopolitical action so important that it started what is today the controversial case of TikTok. The thesis aims to answer the research question, showing how the Indian ban of TikTok has highlighted the platform's role as a geopolitical tool and what are the government and media narratives that have strengthened its role. The thesis also aims to investigate the results of this case study by offering a future forecast of the regulatory challenges and implications that TikTok will face today, particularly in the western world.

[19] Cabinet Office & The Rt Hon Oliver Dowden CBE MP (2023). TikTok banned on UK government devices as part of wider app review. Gov.UK.
[20] Corder, M. (2023). Dutch gov't staff discouraged from apps such as TikTok. AP News.
[21] AFP (2023). Norwegian government bans ministers and officials from using TikTok. The Local Norway.
[22] Australian Government (2023). Protective Security Policy Framework Direction 001-2023. Australian Government.
[23] Scatton, S. (2023). TikTok Risk or Threat? Competing narratives about risks and threats in the US case. Umeå University.
[24] Confessore, N. (2018). Cambridge Analytica and Facebook: The Scandal and the Fallout So Far. The New York Times.

To do this, the thesis must be divided into four main chapters. The first chapter aims to provide the reader with an initial conceptual framework of the case study's context, namely a definition of the concept of digital sovereignty in theoretical and practical terms. In order to offer a solid conceptual foundation for a full understanding of the rest of the thesis, it is essential to divide the following chapter into three other sections. The first is dedicated to the historical analysis of the concept, starting with Jean Bodin's classical theory of the 16th century, then tracing in the second one its path to the digital era of the 1990s in which an initial faltering of state authority in favour of cyber exceptionalism is addressed. Finally arriving in the third section at today's post-2013 Snowden revelations, a case that has acted as a determining factor in a new renaissance for state sovereignty over the digital ecosystem, overflowing with external threats. Subsequently, the second sub-chapter focuses on the theoretical aspects and practical challenges that digital sovereignty faces today. The first section of the second sub-chapter introduces its definition, the actors involved in its application and finally the balance a State must strike with them within its state sovereignty. The second and third sections are a conceptual extension of what has just been described. Indeed, the second section describes the dimensions of claims in which the actors involved assert themselves to the state authority, while the last section analyses how these claims are actually implemented in national contexts. Finally, the first chapter closes by highlighting the practical application of digital sovereignty in the first emblematic case of the digital era. In this opening part focused on the understanding of the case study's context, we therefore address the historical and political context that influenced the data securitisation policies implemented by the Modi government. This is analysed through a first section dedicated to understanding data securitisation and its application to national digital assets. Secondly, it is crucial to analyse the three key initiatives that kick-started India's data localisation policies as of 2018, and finally, the key role of political narratives against data colonialism and in favour of digital sovereignty is highlighted. A key geopolitical context in which the 2020 TikTok ban case study will be placed in.

Subsequently, the second chapter is divided into three paragraphs, offering a complete overview of TikTok from historical, technological and geopolitical points of view, preparing the thesis reader for a more in-depth analysis in the following chapters. The first paragraph covers the history and development of the app, starting from its founding by parent company ByteDance, through the acquisition of Musical.ly, to its international market launch from Douyin to TikTok. As a means to totally understand the success of the Chinese app, it is vital to explore the business strategies that have allowed TikTok's penetration into global markets, until then dominated by US-based apps, and its subsequent privileged positioning over its main competitors thanks to tactics that have allowed it to prevail in the technological market. Once explained the path of success of TikTok to today, explaining the app internal functioning is extremely important in identifying the roots of foreign

governments' concerns. For this reason, the second paragraph, delves into the operation of the sophisticated algorithm of the feed ForYou based on artificial intelligence, analysing the policies of collection, storage and sharing of data by the TikTok team, with a focus on the different regulations implemented for the different areas of the world. Concluding with a careful analysis of what is the famous business model of TikTok, as well as the main source of revenue and Holy Grail of all creators and brands. Finally, the second chapter closes its research by discussing what are the main criticisms directed towards the security of the app, namely the fears related to aggressive data collection, a hypothetical influence by the Chinese government on the company subject to Chinese legislation and the risks associated with any manipulation of the content suggested by the TikTok feed algorithm.

Chapter three, on the other hand, is the main core of the thesis. The focus in this passage is extremely relevant, as the ban imposed on TikTok by the Indian government in 2020 is finally analysed in detail. This chapter is essential because it helps the reader understand how an app designed for the sole entertainment of users has actually become the focal point of geopolitics in recent years, representing the intersection of digital sovereignty, digital security and international relations. Its importance lies in its role as a precedent for other nations that are following its model. However, to contextualise the ban, it is necessary to start with an initial section that navigates the complex historical relations between India and China to the present day. It will begin with the historical roots of the rivalry, then analyse the contrasting policies of the new century, leading up to the fatal Galwan clash in 2020 that initiated the digital and geopolitical rivalry we know today. Secondly, it will offer a detailed analysis of the official and unofficial motivations that prompted the Indian government to implement the ban, showing how the ban represented more a symbolic act of resistance rather than a mere defensive action. To delve deeper into the more symbolic reasons behind the ban, we need to shift our attention to what most influenced the nation's perception, namely the role of the media and the narratives that shaped public opinion. In fact, the sub-chapter highlights how the narrative actually influenced and amplified support for the measure. Finally, chapter three closes with a detailed analysis of the real implications, domestic and foreign, that the ban had, going beyond biased media narratives. This section highlights the real effects on the digital ecosystem, geopolitical perceptions and the discourse revolving around digital sovereignty, showing the reader the origin of what geopolitics is today.

To conclude, chapter four will be divided in order to provide to the reader a comparative, summary and prospective view of the different narratives and regulations faced by countries around the world vis-à-vis TikTok, following the Indian model. For this reason, the first sub-chapter will focus on a comparative analysis of the various regulations implemented by different parts of the world, divided by continents. The analysis will be based on political, economic and cultural factors

that have influenced the decisions, highlighting how Western-aligned countries have adopted similar restrictions and for similar reasons, while other countries more connected by economic relations with China, although sceptical towards TikTok, have opted for collaborative measures and for different geopolitical reasons. In the second sub-chapter, however, it will be crucial to examine the results that emerged from the first one. The analysis will be based on recurring patterns, shared justifications and an in-depth look at TikTok as an effective geopolitical tool. Finally, the third and final section of the thesis will be devoted to the broader implications of TikTok and its role in the geopolitical scenario. The key themes will be geopolitical competition, digital sovereignty and Internet fragmentation. To conclude, the study will leave room for outlining future scenarios for TikTok and the fate of digital platforms in the geopolitical landscape.

CHAPTER 1: DIGITAL SOVEREIGNTY IN THEORY AND PRACTICE: FOUNDATIONS AND CHALLENGES

The rise of digital platforms like TikTok has rekindled debates about sovereignty, forcing states around the world to reconsider their control over data flows and local infrastructures in a hyper-connected world. But, at what point did the concept of digital sovereignty become crucial to the nation-state debate? Could we effectively identify the moment when the world began to feel the need to control its digital resources and infrastructures? Although there is no precise moment in time when the international scenario needed to evolve its idea of sovereignty, with the emergence of digital platforms, especially those of Chinese origin such as TikTok, the concept of digital sovereignty has undoubtedly begun to make room more and more into the global geopolitical discourse. For a better understanding of the central role of digital sovereignty in the global geopolitical discourse, it is essential to trace its historical and theoretical development over time. This first chapter therefore aims to provide a theoretical overview of the concept, highlighting the path nation-states have taken to date to reclaim their autonomy over local digital infrastructures in an increasingly complex and insidious online world.

In recent decades, digital sovereignty has become a priority topic for both the public and states, liberal democratic as well as authoritarian ones[25]. This is an extremely complex notion, which one could define as the way a state regulates its technology and digital infrastructure, but also access to and protection of data within national borders. Or said more simply: its "control over the Internet"[26]. The search for a clear and unanimous definition is difficult to find, as there are different interpretations and various contexts to which it can be applied. The concept of digital sovereignty may seem a paradox itself. On the one hand, the traditional concept of sovereignty has very ancient origins, on the other hand, it is flanked by the term "digital", which is new and in constant evolution. In this unclear context, some scholars argue that digital sovereignty emerges as the state's response to adopt data control policies with rigid approaches and within certain territorial boundaries to the growing digital influence[27]. Others, however, support the idea that this is more about the ability of governments to take independent decisions and actions against digital infrastructures, based on their own internal needs[28]. Both arguments, whether based on rigid approaches or on free state choice, reflect the perspective that data sovereignty is a way to strengthen the legal initiative of states in regulating

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[25] Kumar, A., & Thussu, D. (2023). Media, digital sovereignty and geopolitics: The case of the TikTok ban in India, Media, Culture & Society.
[26] Su, C., & Tang, W. (2023). Data sovereignty and platform neutrality – A comparative study on TikTok's data policy, Global Media and China.
[27] Glasze et al. (2022). Contested Spatialities of Digital Sovereignty. Geopolitics.
[28] Pohle, J., & Thiel, T. (2020). Digital sovereignty. Internet Policy Review.

online activities within their national borders. However, the fact that different realities can claim their own right to digital sovereignty according to their own internal objectives opposes the very idea of the Internet as a free and unrestricted place, leading to the so-called "splinternet"[29], namely to a digital reality fragmented by different political agendas.

It is undeniable that the digital transformation seems to challenge the core concept of sovereignty, as territoriality and hierarchy are replaced by flexible digital networks, threatening control by traditional legal governance and the existence of the state itself[30]. It can therefore be assumed that nation-states experience this scenario as a threat and have moved to enforce their own laws and implement control also in their own digital territory. Thus, in recent years they have in fact created legal instruments to counter digital governance[31] and have convinced their citizens that state functions are essential to protect them from media control[32]. Therefore, it is the citizens themselves who expect states to protect their privacy, but these states do not simply reassert their state authority, but try "to reinstate the nation state […] as a relevant category in the global governance of digital infrastructures"[33]. It is evident that, as privacy and data protection increasingly represent a shared value, digital sovereignty is assuming a growingly central role in the geopolitical discourse, but also in that of the economics of digital platforms, becoming the key for crucial issues such as "data sovereignty, platform neutrality and digital governance"[34]. A return to digital sovereignty is therefore inevitable, as we can identify the increasing importance of platform regulation in recent times.

As TikTok is the only Chinese platform to have achieved such a wide global presence, it has been faced with significant legal regulations and geopolitical tensions. Indeed, its data policy is the subject of legal and political debates, which makes the app highly relevant to the study. It is useful to place TikTok within this growing search for global sovereignty, as it is an interesting indicator to explain the limitations of the Chinese app in the international market, to interpret its need for independence from the Chinese government, as well as to investigate the future of social platforms in today's geopolitical complexity. Specifically, this chapter lays the groundwork for understanding the reasons behind the limitations of foreign digital platforms, understanding how these discourses develop locally and analysing the path and internal motivations that have driven India to seek greater digital autonomy. In order to achieve this, the concept of digital sovereignty will be introduced and applied through three essential sub-chapters. The first sub-chapter aims to navigate the concept of digital

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[29] Su, C., & Tang, W. (2023). Data sovereignty and platform neutrality – A comparative study on TikTok's data policy, Global Media and China.
[30] Pohle, J. & Thiel, T. (2020). Digital sovereignty. Internet Policy Review.
[31] Goldsmith, J., & Wu, T. (2006). Who controls the internet? Illusions of a borderless world. Oxford University Press.
[32] Pohle, J. & Thiel, T. (2020). Digital sovereignty. Internet Policy Review.
[33] Pohle, J. & Thiel, T. (2020). Digital sovereignty. Internet Policy Review.
[34] Su, C., & Tang, W. (2023). Data sovereignty and platform neutrality – A comparative study on TikTok's data policy, Global Media and China.

sovereignty from a historical overview. It will trace its origins and evolution from Jean Bodin's first classical concept of sovereignty in the 16th century to the advent of modern digital challenges that have shaken its solid groundworks. Finally, contemporary history will be analysed, characterised by a newfound need for the presence of the state in the digital ecosystem, threatened by security concerns and geopolitical tensions post-Snowden revelations. The second sub-chapter will finally analyse the concept of digital sovereignty as we understand it today, breaking it down into dimensions, categories and actors that characterise its nature. Being a mutable element, digital sovereignty changes shape and responds to balancing challenges depending on the context. After analysing the concept of digital sovereignty historically and conceptually, we apply theory to practice. In the last sub-chapter, there is a transition from what digital sovereignty could be to what it actually is in the contemporary Indian context. Here, the unique application of data governance by the Indian government is explored, highlighting the causes, narratives and outcomes of their policy choices.

1.1 From Sovereignty to Digital Sovereignty: An Historical Perspective

In order to introduce the concept of digital sovereignty and explore its impact in the contemporary geopolitical arena, it is first vital to place it in a broader historical context, discovering its historical roots and conceptual development over the centuries. The aim of this sub-chapter is to draw a clear picture of the evolution of the concept of sovereignty to what we understand today as digital sovereignty, starting from the theoretical foundations of the 16th century up to examining the challenges posed by nowadays digital world. This section uses the work of Pohle and Thiel (2020) as a basis for describing the changes sovereignty has undergone in response to technological transformations and international requests. To achieve this, each section must first be clearly structured and for this reason the first sub-chapter is divided into three paragraphs. Firstly, it is necessary to trace the historical and conceptual origin of the classical theory of sovereignty, first elaborated in the 16th century by the philosopher Jean Bodin and understood as synonymous of the absolute and indivisible power of a sovereign to govern his state without external intervention. It was then reinterpreted by scholars such as Jean-Jacques Rousseau who described an evolution in its application more associated with democratic values of popular sovereignty and territoriality, as we understand it today. In the second section, it will be essential to apply the concept to more recent times and more related to the new technological challenges, namely the emergence of the new ideology of cyber exceptionalism since the 1990s. The new model represents the first real challenge to the classical concept of state sovereignty, interpreting digital space as a reality independent of state jurisdiction and questioning sovereignty for the first time in favour of a more autonomous and decentralised cyber sovereignty. In the last section, on

the contrary, we will emphasise how actually in recent times the concept of sovereignty has been reborn in new forms and reinvigorated by growing concerns over data protection and national security. In fact, it will be analysed how, since the Snowden case in 2013, nation-states and their citizens have encountered a new and surprising demand for more protection from private technological giants, transforming again the notion of sovereignty and applying it to the new demands of the worldwide scenario. Through this historical journey of sovereignty, it will be easier to understand the increasing role of digital sovereignty in the regulation of digital platforms and the balance of the world. Moreover, in the path from absolute authority in the 16th century to the need for adaptive power in the digital age, it will become increasingly evident how nation-states have always had a natural tendency to protect their power from external influences. Today, the situation does not change: the new challenge is to maintain this power within a digital and transnational world.

1.1.1 Traditional Sovereignty: Origins and Development (since the 16th Century)

To explore the genesis of the concept of digital sovereignty and understand in-depth modern dynamics, it is essential to take a few steps back. Examining why nation-states nowadays feel the need to impose their digital sovereignty is actually not a new analysis. In fact, this concept finds its roots in an ancient theory that sought to legitimise state authority within fixed territorial boundaries. The term under analysis has a modern value, but rests on the historical concept of sovereignty, understood as "the power enjoyed by a governing body to rule over itself"[35]. The 16th century French philosopher and politician Jean Bodin conceived the first classical theory of sovereignty based on the perpetual, absolute and indivisible power of the highest authority, namely the monarch. It is clear that to get to the present day, the thought has been reformulated and this is mainly due to the philosopher Jean-Jacques Rousseau who, strengthened by the Enlightenment environment, shifted power from the hands of the sovereign to that of popular sovereignty, conceptually bringing sovereignty very close to democratic values, the will of the people and the rule of law. Today, the concept has evolved further and has taken on the appearance of a two-dimensional sovereignty: on the one hand, there is the external sovereignty in which the state has to deal with other countries and other sovereignties, demonstrating its independence, but also cooperation; on the other hand, there is the internal sovereignty, influenced by popular sovereignty and delimited by territorial boundaries that represent a fundamental requirement in the exercise of state power within

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[35] Pohle, J. & Thiel, T. (2020). Digital sovereignty. Internet Policy Review

certain geographical limitations[36]. From here, the foundations are laid for more modern interpretations that make the elements of digital sovereignty more flexible and adapted to the needs of the contemporary context.

1.1.2   The Rise of Cyber Sovereignty and the Fall of State Sovereignty (1990s-2000s)

Having laid the groundwork for understanding the very first historical origin of digital sovereignty, it is essential to introduce the concept into a closer historical framework, where the roots of first needs for digital regulation can be found. The first challenge that initiated the debates against sovereignty is the so-called cyber exceptionalism[37], i.e. the notion that digital reality is qualitatively different from analogue reality and that the Internet can escape state control. This was a first and traumatic turning point for sovereignty, alluding to a special treatment of new digital innovations that is different from that of old ones. The vision was born at a flourishing time for the digital context. In fact, thanks to the rise of the commercial internet, the 1990s began to instil the idea of cyber exceptionalism in the public debate, based on the assumption that its increasing importance could sooner or later lead to the weakening of state sovereignty[38]. Although the development of digital technologies was actually regulated in those years by markets and regulations, cyber exceptionalism, or cyber libertarianism[39], was a shared thought that shook the foundations of state sovereignty. It is in this context that the first cyber libertarians, disillusioned with classical political institutions, are unanimous in stating that "digitally mediated forms of politics will prompt a decentralised organisation of societies"[40], as only more modern governance can effectively respond to the new requirements, replacing outdated concepts such as sovereignty and territoriality in favour of transnational digital networks.

There were several reasons why traditional governance was considered obsolete, but they can be concentrated in three arguments. Firstly, it would be unthinkable to adequately regulate the complexity and transnationality of digital networks under a limited national jurisdiction that only has power within certain territorial boundaries; secondly, the same measures and legislations are too slow to keep up with the constant technological innovations to provide sufficient legal coverage; finally, the digital world allows individuals to deviate

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[36] Grimm, D. (2015). Sovereignty: The Origin and Future of a Political and Legal Concept. Columbia University Press.
[37] Pohle, J. & Thiel, T. (2020). Digital sovereignty. Internet Policy Review
[38] Katz, J. (1997). Birth of a Digital Nation. In Wired.
[39] Keller, C. I. (2019). Exception and Harmonization: Three Theoretical Debates on Internet Regulation. HIIG Discussion Paper Series.
[40] Pohle, J. & Thiel, T. (2020). Digital sovereignty. Internet Policy Review

from legal liability, as the attribution of responsibility was still a weak element in online spaces[41]. Viewing the new world from this perspective makes the need for cyber sovereignty, which breaks down the limits of governmental and territorial regulations and can autonomously govern the virtual realm, undeniable[42].

Nowadays, it is still possible to come across what is left of these governance debates, as in the case of cryptocurrencies[43]. Yet, the probability of a threat to the traditional governmental system in favour of the digital one soon vanished. Political institutions and digital infrastructures have evolved and the commercialisation of the internet has given way to a more controlled and less horizontal structuring through the inclusion of new actors, allowing for intervention and regulation[44]. So, it is true. Cyber exceptionalism no longer represents an ideological threat to sovereignty, but around 2004 a new digital challenge has materialised, namely "multi-stakeholder internet governance" (MSG)[45]. The latter represents a challenge to sovereignty not so much as a threat to national governance, but more as a model suggesting that states do not assume a regulatory role in managing the digital, leaving the responsibility of managing it to the actors directly involved, or the so-called multi-stakeholders[46]. Decentralised processes and self-management would seem to be the new keywords needed to control digital infrastructures on the basis of "principles of openness, inclusion, bottom-up collaboration and consensual decision-making"[47], culminating in the reduction of the need for centralised authority[48]. In the global policy arena, however, there has been no shortage of external conflicts, often driven by the fact that this model seems to want to replace the international institutions of governments with transnational realities that transcend state borders and, above all, against the desire of some states to subject the Internet to the control of multilateral institutions in order to increase state governance[49]. As regards internal conflicts on this issue, they often arise due to the neo-liberal nature of multi-stakeholder internet governance often criticised[50] and due to difficulties in coordinating the different management processes and thematic changes[51]. Although this governance model has

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[41] Post, D. G. (2007). Governing Cyberspace: Law. Santa Clara High Technology Law Journal.
[42] Barlow, J. P. (1996). A Declaration of the Independence of Cyberspace. Electronic Frontier Foundation.
[43] Pistor, K. (2020). Statehood in the digital age. Constellations.
[44] Pohle, J. & Thiel, T. (2020). Digital sovereignty. Internet Policy Review
[45] Savage, J. E. (2015). Exploring Multi-Stakeholder Internet Governance. EastWest Institute.
[46] Pohle, J. & Thiel, T. (2020). Digital sovereignty. Internet Policy Review
[47] Pohle, J. & Thiel, T. (2020). Digital sovereignty. Internet Policy Review
[48] Raymond, M., & DeNardis, L. (2015). Multistakeholderism: Anatomy of an inchoate global institution. International Theory.
[49] Glen, C. M. (2014). Internet Governance: Territorializing Cyberspace? Politics & Policy.
[50] Chenou, J.-M. (2014). From cyber-libertarianism to neoliberalism: Internet exceptionalism, multi stakeholderism, and the institutionalisation of internet governance in the 1990s. Globalizations.
[51] Malcolm, J. (2008). Multi-stakeholder governance and the Internet Governance Forum. Terminus Press.

been examined, it has encountered obstacles far beyond ideology. Transnational policies have not been implemented and the continued efforts by states to regionalise the internet seem to be in the way of achieving the level of consensus hoped for[52]. For this reason, the multi-stakeholder internet governance model is not a sustainable option for the future, but rather as a complementary possibility to the sovereignty of the states aimed at non-binding activities[53]. Despite cyber exceptionalism has lost ground over time, it has paved the way for new interpretations of the concept of digital sovereignty. Indeed, the world's states have had to face new challenges from the international context and have found modern solutions for the effective regulation of digital infrastructures.

1.1.3 The Resurgence of State Sovereignty in the Digital Era (post-2013)

After having outlined the steps that the international community has had to take in order to achieve what is now a first, and still dissenting, conception of digital sovereignty; it is now necessary to identify the current challenges that go along with the evolution and affirmation of this concept in recent times. To this day, the world's citizens still hear the echo of ideological debates as a symbol of a threat to state sovereignty and it is also undeniable that there are still many challenges for state power in the face of the ever-changing digital scenario[54]. Nevertheless, all the above arguments, which suggested a governmental incapacity of state sovereignty, have now lost their value. To date, this same value has been restored and several actors on the international scene now claim a consolidation of sovereignty in the digital environment. It seems that over the years, the actors involved have decided to unite with the state sovereignty to address larger concerns. In fact, since the Snowden case of 2013, there has been an increasing push towards strengthening digital sovereignty and state control over digital. The risk of surveillance from outside countries has awakened in countries around the world a new awareness, namely the need to protect their own digital sphere.

There are two reasons in which one can find the answer to the reaffirmation of state sovereignty and these are extremely important for placing the Indian case study under consideration. In essence, the first reason lies in the new awareness that the real risk to state sovereignty does not come from the decentralization and transnationalism of digital platforms, but from the enormous purchasing power that large tech companies have gained from a highly commercialised internet which gives them an advantage over both tangible and intangible

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[52] Voelsen, D. (2019). Cracks in the internet's foundation: The future of the internet's infrastructure and global internet governance. Stiftung Wissenschaft und Politik. German Institute for International and Security Affairs.
[53] Pohle, J. & Thiel, T. (2020). Digital sovereignty. Internet Policy Review
[54] Mueller, M. L. (2010). Networks and States: The Global Politics of Internet Governance. MIT Press.

social infrastructures[55]. With this in mind, it is clear that digital platforms can play a dominant role in the challenge to sovereignty, aware that by exercising their power they can hold out against traditional governance[56]. The technological giants provide real infrastructures essential for modern society and, with this awareness, can interfere with sensitive issues of states. The most relevant examples are reflected above all in the digital economy and markets, making these realities so influential that they can be called "quasi-sovereign"[57]. It is precisely from the growing authority of these actors that political debates have arisen, which increasingly give more room for intervention to state sovereignty and self-government[58], as we will see later in the Indian case. The second reason for the strengthening of state sovereignty and, consequently, the need for digital sovereignty, can be found in the case of Edward Snowden in 2013[59]. The well-known case of surveillance practices revelations by the US has immediately triggered a warning from various countries. The need for a separate and autonomous digital world where each state could exercise control over its own territory was becoming increasingly strong. Since then, more and more state actors have claimed their digital sovereignty due to concerns about data protection, surveillance and foreign espionage[60]. This is the moment when the digital world begins to worry about its nature itself: from a fluid and transnational world to the clear delimitation of its territorial boundaries.

As if it were a continuous battle of supremacy, the state sovereignty has definitively silenced the reinterpretations that the scholars wanted to pin on it. Questioned over the centuries, state sovereignty has been restored through the need for digital sovereignty, a concept dear to the states of today's landscape. The strengthening of digital sovereignty represents a shift from the decentralized vision of the Internet to the reaffirmation of state authority as a response to modern digital risks, laying the foundations for contemporary digital sovereignty. In these years, and in this thesis, we are witnessing an extension and a complete "resurrection of sovereignty as a geopolitical claim"[61] to face the new challenges of globalisation and technological innovation. However, it is obvious that digital sovereignty must be adapted to the current context and must take into account what are the characteristics of the hyper-connected societies in which it applies. What are the limits and risks of digital

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[55] Pohle, J. & Thiel, T. (2020). Digital sovereignty. Internet Policy Review
[56] Zuboff, S. (2019). The age of surveillance capitalism: The fight for a human future at the new frontier of power. Profile Books.
[57] Pohle, J. & Thiel, T. (2020). Digital sovereignty. Internet Policy Review
[58] Van Dijck, J. (2019). Governing digital societies: Private platforms, public values. Computer Law & Security Review.
[59] Lyon, D. (2014). Surveillance, Snowden, and Big Data: Capacities, consequences, critique. *Big Data & Society*, *1*(2).
[60] Pohle, J. & Thiel, T. (2020). Digital sovereignty. Internet Policy Review.
[61] Pohle, J. & Thiel, T. (2020). Digital sovereignty. Internet Policy Review.

sovereignty today? How can one state power be imposed, but also collaborate, in a transnational context? This is where the most complex part of the analysis begins.

1.2 Dimensions and Limits in Defining Digital Sovereignty

As has just been highlighted, the concept of digital sovereignty as we know it today has been put to the test by the challenges of the times, becoming a central theme in political, economic and academic debates. This sub-chapter aims to explore the dimensions and actors in which the concept is applied, highlighting how modern states balance citizens' rights and economic needs for digital regulation in practice. In the digital ecosystem, nation-states have faced technological pressures in regulating online infrastructures due to emerging concerns about data protection, privacy and national security. Unfortunately for governments, the challenges are not limited to this. Democratic government also needs to balance public and private interests, while continuing to ensure respect for a free digital space. Analysing digital sovereignty also means putting the emphasis on the role that states can and should play in shaping and, in some cases, limiting the digital market in the trading between technology companies and citizens. However, digital sovereignty varies according to the geopolitical, cultural and legal context and as a result it is difficult to find a unified definition and explain in a cohesive way how states exercise their sovereignty. For this reason, academic research has broken the concept down into specific dimensions. Each of these raises several complex questions, such as the role of the state, that of citizens and that of large tech companies. In this new perspective of sovereignty, states are for the first time able to deal with other actors offering themselves as mediators and guarantors of rights in commercial relations between companies, protagonists of the digital market, and citizens themselves, as active creators and buyers.

This sub-chapter then proposes to offer a stratified understanding of the term, exploring its present facets. The sub-chapter is structured in three sections, which analyse theoretical aspects and identify categories of claims in the context of sovereignty. In the first section, we provide an introductory definition of what digital sovereignty is today, breaking down the concept, placing it in a broader framework and identifying the actors involved. Next, to define how digital sovereignty is applied and introduce what the very first conceptual challenges are, the second section aims at classifying and explaining the three categories of claims in which sovereignty is shaped. Finally, the third and final part focuses on the practical limits that the state encounters when it must apply digital sovereignty, taking into account the different dimensions within which it has to act. The concept is therefore multifaceted and versatile according to national contexts and geopolitical needs, being prone to mutations in response to global pressures.

1.2.1 Defining Digital Sovereignty

To discuss the theoretical concept of digital sovereignty in-depth, it is crucial to break down the notion and settle it in a more general and practical framework to better understand its function and importance in a contemporary context, according to scholars. As we mentioned earlier, the concept is extremely complex and highly focused not only in political discourse, but also in economic discourse. At the base of the concept there is the definition of "control of the internet"[62], underscored by growing concerns about data protection, privacy and national security in the online world.

Being a broad definition, scholars are divided on its interpretation according to contexts, which is why Glasze et al. in 2022 decided to break the concept down into several dimensions in which it can be applied concretely. These include "physical data storage, technological or infrastructural innovations, and legislations introduced to regulate digital platforms"[63], dimensions of digital sovereignty that clearly reflect doubts of balance. Furthermore, in today's scenario there are three main actors, namely "nation-states, citizens (Internet users) and digital technology companies"[64], in which companies are the sellers of online products and services, citizens have a dual role in which they can participate actively as content creators but also passively as vulnerable, and finally, the state refrains from selling or buying online, but supervises the market and digital transactions between companies and citizens when they are unable to do so independently and fairly[65]. In conclusion, it is then the state that regulates the balance of digital platforms: by implementing measures and guidelines, it ensures the proper maintenance of national digital sovereignty. Defining the concept as the need for state control over digital infrastructure and data flows highlights the necessity to balance public and private interests as a result. The definition thus allows us to precisely identify the current challenges that governments have to solve in the digital environment.

1.2.2   Three Dimensions of Claim: State, Economy and Users

Even from this very first definition, one can foresee the first issues which concern mainly the balance to be maintained between the actors involved. For this reason, this section aims

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[62] Chander, A., & Sun, H (2021). Sovereignty 2.0, University of Hong Kong Faculty of Law Research Paper.

[63] Su, C., & Tang, W. (2023). Data sovereignty and platform neutrality – A comparative study on TikTok's data policy, Global Media and China.

[64] Rafik, M. (2021). Data sovereignty: New challenges for diplomacy, in artificial intelligence and digital diplomacy, Springer International Publishing, Cham.

[65] Van Dijck, et al. (2018). The platform society public values in a connective world. Markets, Globalization and Development Review, ISMD.

to delve into the categories within which digital sovereignty must juggle. If one assumes that digital sovereignty takes on different connotations depending on the context and the actors involved, one can also say then that the type of self-determination that is to be promoted also changes[66]. From this assumption, as highlighted by Pohle and Thiel (2020), it is possible to classify three dimensions of digital sovereignty claims in the context, each of which represents certain priorities and strategies, helping the reader to recognise the different declinations of digital sovereignty.

- Claim of State Autonomy: this is the most relevant category, as it concerns the state's claim to independent control over its own digital infrastructure within its national territory and for its citizens. Within this category, however, we find two different currents of thought that we could associate with liberal and non-liberal countries. With regard to the latter, the emergence of digital communications represents a threat to one's national political system. This is the case of authoritarian countries such as Russia or China, which was the first to face the threat by developing its own idea of digital sovereignty. Indeed, China is a model of sovereignty quite rigid in favour of a centralized control system. Liberal countries, on the other hand, have also admitted their digital vulnerability and, concerned by the growing digital security needs following the Snowden revelations, have also implemented their own digital independence[67]. India, as explored later, has recently implemented data localisation policies despite being a democratic government, claiming its own autonomy on digital.

- Claim of Economic Autonomy: not far from and conceptually close to the state sovereignty claim, can be found the national economic claim against foreign market players. In recent years, local digital service providers have sought more and more space in the market, driven by the dominance of US and Chinese technology companies[68]. A self-determination driven by the desire to transform digital economic sectors, traditional or non-traditional, into new economic strategies aimed at promoting the productive capacity of local companies[69]. Supporting this argument is the example of the 2019 European project Gaia-X. A regional alternative designed by France and Germany to counter the leading foreign cloud services and to create "the de facto standard aligned with EU values by developing a set of policies, rules,

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[66] Pohle, J. & Thiel, T. (2020). Digital sovereignty. Internet Policy Review.
[67] Pohle, J. & Thiel, T. (2020). Digital sovereignty. Internet Policy Review.
[68] Steiger, S. et al. (2017). Outrage without Consequences? Post Snowden Discourses and Governmental Practice in Germany. Media and Communication.
[69] Bria, F. (2015). Public policies for digital sovereignty. Platform Cooperativism Consortium conference, New York.

specifications and a verification framework"[70]. Although this initiative was later criticised for being too ambitious and too state-controlled, it represented one of the most emblematic steps in the establishment of the European digital economy[71]. The Indian government is also trying to build a solid digital market, implementing projects that reduce dependence on other countries, such as Digital India[72].

- Claim of User Autonomy: as described in the following section, this category is becoming increasingly relevant in the context of digital sovereignty. The self-determination of users applies to them as citizens, consumers, but also workers in the digital ecosystem. In recent years, democratic countries, are taking the lead on an idea of sovereignty no longer centred on the nation-state but on its citizens. Autonomous and informed decisions by individuals are being encouraged, promoting a "user-friendly and domestic technology development"[73]. From this perspective, digital sovereignty is losing its connotation relating exclusively to state control and is increasingly taking on a role as means of protecting and enhancing the rights of users as democratic citizens.

The three claim dimensions are very powerful and underline the complexity of the notion of digital sovereignty, where each government interprets and applies its definition according to its own geopolitical priorities but also the various actors of a state are trying to emerge.

1.2.3   A Difficult Balance: State Intervention v. Citizen Rights and Platform Neutrality

After exploring digital sovereignty as a whole and breaking it down into dimensions, actors involved and categories of claims, this final conceptual section focuses on the practical limits of digital sovereignty implementation, balancing state power with the need for the defence of individual rights and the neutrality of digital platforms. In the previous part, the thesis focused on defining the actors, passive or active, who are part of digital sovereignty. It is now necessary to determine what are actually the practical limits resulting from the coexistence between them in the context of the virtual world. In a geopolitical scenario, in which digital technologies shape the political, economic and social spheres of every society, a key question emerges: how and to what extent a state can actually intervene in the digital ecosystem to protect its national security? However, it is evident that applying state control in

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[70] Gaia-X: A Federated Secure Data Infrastructure (2023). Official Website.
[71] Pohle, J. & Thiel, T. (2020). Digital sovereignty. Internet Policy Review.
[72] Tiwari, A. et al. (2017). Digital India Initiatives: An Educational Panorama.
[73] Pohle, J. & Thiel, T. (2020). Digital sovereignty. Internet Policy Review

a free, democratic and transnational space involves several challenges: while the state intervenes for the public interest, the rights of individuals and the neutrality of platforms can be limited and can be put at risk. To untangle the complex situation, it is necessary to divide the issue into two parts. The first explores the challenges and balancing compromises states face between security and popular self-determination. In the second and final part, the dynamics between platforms neutrality and state intervention are concretely analysed and how these vary depending on the geopolitical context. The challenges related to digital sovereignty highlight the need for balance between the three actors involved.

State Intervention v. Individual Rights

The complex issue of digital sovereignty raises relevant questions concerning both state control and the rights of its citizens. In particular, state intervention in regulating digital infrastructure involves significant concerns, especially in democratic states, where the protection of individual rights and freedom of expression clash with the needs of national and economic sovereignty. At this point, one can state two points. First, that the term sovereignty, conceived centuries before the digital era, takes on different interpretations regarding the control that a state may have within its territorial borders and, second, that the adjective digital instead refers to a vast infrastructure of data and digital networks that respond to different governance and transnational boundaries. Assuming these two terms, it is therefore accepted that sovereignty is synonymous with a form of control and power that prevails over any other reality within national borders and over its own population[74]. Questions arise here and it is clear to identify what new challenges digital sovereignty faces. To what extent can the state exercise its authority over its territory, and especially over its citizens, in an international cyber context? And how can digital sovereignty be concretely maintained in a context where territorial borders are transcended, while protecting and not restricting rights?

In this perspective, the questions assume greater relevance especially in democratic societies, where the tendency of the state to exercise power clashes with the value of individual and political self-determination[75]. According to some scholars, the balance can be found by balancing and distinguishing state sovereignty from popular sovereignty, clearly defining the boundaries between the power of authority and the rights of the people[76]. This distinction

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[74] Havercroft J (2011) The Captive of Sovereignty. Cambridge: Cambridge University Press.
[75] Kumar, A., & Thussu, D. (2023). Media, digital sovereignty and geopolitics: The case of the TikTok ban in India, Media, Culture & Society
[76] Benhabib S (2016) The new sovereigntism and transnational law: Legal utopianism, democratic scepticism and statist realism. Global Constitutionalism.

prevents digital sovereignty from turning into protectionism or authoritarian control, putting the freedoms of individuals at risk. Indeed, the UN itself has stated that in the exercise of digital regulation, governments often tend to ignore the individual rights of users stipulated by the Universal Declaration of Human Rights (UDHR)[77], such as the right to freedom of opinion and expression in Article 19[78]. The risk for citizens is obvious: on the one hand, there is the need for the true sovereign, the citizens, to be protected by state sovereignty; on the other, they run the risk of seeing their rights restricted in favour of the public interest. So where does digital sovereignty end and protectionism begin?

In order to fully understand the facets of digital sovereignty in its intersection with the rights of individuals, it is necessary to examine what the nature of digital sovereignty is in the state under consideration and how much it weighs more or less against the rights of the sovereign people. In this sense, significant differences emerge in different state realities based on how they interpret and according to what meaning they give to digital sovereignty. This is the case of democratic states, such as France where digital sovereignty is understood as "strategic autonomy"[79], whereas in Germany, on the other hand, a growing political consensus revolves around state control over digital infrastructures, strengthening state intervention in the protection of citizens' privacy and the regulation of digital networks. Both, therefore, emphasise strategic autonomy and the protection of privacy as instruments to strengthen citizens' rights. Then there are national contexts outside Europe, as Russia which places more emphasis instead on an autonomous internet as a means of increasing their national technological self-sufficiency and opposing US digital supremacy. The move to focus more on self-sufficiency and resistance to foreign companies could likely come at the expense of freedom of expression. This is the case in Iran, where protectionism has favoured the emergence of local digital platforms, but also censorship. In this context, India seems to support the current of thought with the application of the so-called "data securitisation"[80], i.e. the tendency to limit any transmission of data across borders, which is why many countries in the West see the Indian government as more inclined to protectionist policies that have little to do with India's foreign relations to date. In the application of digital sovereignty, it is also essential to measure the value placed on user data by governments. For instance, it is useful to point out that in the US, personal data are considered a strategic asset, while in Europe they

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[77] United Nations (2018). Government Policy for the Internet Must Be Rights-Based and User-Centred. Un Chronicle.
[78] United Nations (1948). Universal Declaration of Human Rights.
[79] Glasze, G., et al. (2023). Contested spatialities of digital sovereignty. Geopolitics.
[80] Vila Seoane MF (2021). Data securitisation: The challenges of data sovereignty in India. Third World Quarterly.

represent an important sphere of human rights[81]. These examples are extremely relevant, as they tend to confirm the basic idea that digital sovereignty is subject to different interpretations and thus different internal balance choices. Moreover, it highlights how the geopolitical context, cultural patterns and government characteristics of each state influence the balance between state control and citizens.

As demonstrated, in order to understand the ways in which each nation-state exercises its power of digital sovereignty in regulating domestic and foreign digital infrastructures, one must first take into account the internal and external context in which certain digital management needs arise[82]. Long story short, the balance between national security and the protection of rights is a universal challenge in the definition of digital sovereignty. The desire of states to guarantee a certain amount of control within their territory poses a real threat to the individual sphere and this requires elaborate approaches, where national security must be balanced with individual freedom to act in the digital world.

State Intervention v. Platform Neutrality

With this in mind, how do countries act in the face of the third actor as protectionism becomes an increasingly concrete threat? If nation-states decide to adopt a protectionist approach because of their digital sovereignty, it is crucial to analyse the limits within which platforms can act and, above all, to explore when and why state authority intervenes at the level of platforms to guarantee their national digital security. Consequently, it is important to place digital sovereignty in a context of constant changes and international requirements, in which the concept has to be juggled and applied within certain legal limits. It seems that, from this perspective, state intervention can and should fill the gaps left by free markets, which are unable to protect users' rights or ensure a balance between public and private interests.

The application of this concept not only undergoes temporal transformations, but also physical ones, as not all states adopt governance strategies and reserve a certain arbitrariness in their control activities over digital infrastructures. For instance, the United States had a vision of Internet governance originally free of stringent governmental controls[83], in which platforms acted as neutral actors without placing any filtering or censorship on digital products. Yet, as we can still see today, this is an unsustainable vision. Although the United

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[81] Lancieri, F. M. (2018). Digital protectionism? Antitrust, data protection, and the EU/US transatlantic rift. Journal of Antitrust Enforcement.

[82] Kumar, A., & Thussu, D. (2023). Media, digital sovereignty and geopolitics: The case of the TikTok ban in India, Media, Culture & Society.

[83] O'Hara, K., & Hall, W. (2018). Four Internets: The geopolitics of digital governance. Centre for International Governance Innovation.

States has always been reluctant to the idea of interference by state digital sovereignty, it has recently demonstrated a strengthening of the latter with regulations that try to limit the influence of major IT multinationals, such as the 2022 American Data Privacy and Protection Act (ADPPA) that restricts the data monetisation[84]. Similarly, another IT giant has also previously implemented various data regulations. China has established multilevel techniques to monitor data information flows and this system is based on two main laws, namely the 2016 Network Security Law (NSL) and the 2021 Data Security Law (DSL)[85]. This regulatory effort, which marks China's will to reinforce its digital sovereignty, is the first non-Western step in regulating data transmission. In addition to these regulatory actions, there is also the Personal Information Protection Law (PIPL)[86] in 2021, which aims to control the collection and processing of data, and algorithm management regulations in 2022[87] that limit the massive collection of data streams from big data. Similarly, the European Union has also taken important steps in this direction, introducing a real-time evaluation system and notifying users of any algorithmic use on platforms. The European Union is increasingly committed to finding a balance between national intervention and platform neutrality, guaranteeing free Internet access while maintaining the intervention of institutions in digital development[88]. The 2022 EU's Digital Markets Act (DMA)[89] and the European General Data Protection Regulation (GDRP)[90] are in fact the result of European efforts to maintain a safe space for European citizens from possible violations and a fair environment also for foreign actors.

However, human experience in this field shows that platform neutrality is only utopian. Although the concept is also supported by the UDHR, in practice platforms struggle to be fully neutral. Examples are numerous, from the removal of political or culturally sensitive content to the distribution of content. The preferences of media platforms are linked to corporate policies and government intervention lies precisely in preventing the decisions of technological giants from prevailing, leading to imbalance and discrimination. The example of TikTok is fitting. The digital platform is an important factor in the distribution of content and the use of algorithms, which presents itself as a neutral space but is in reality extremely structured, as examined in the following chapter. TikTok deliberately acts according to its

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[84] American Bar Association (2022). The American data privacy and protection act.
[85] Chen, S. (2021). Research on data sovereignty rules in cross-border data flow and Chinese solution. US-China Law Review.
[86] Personal Information Protection Law of the People's Republic of China (2021).
[87] Huld, A. (2022). China's Sweeping Recommendation Algorithm Regulations in Effect from March 1. China Briefing.
[88] Su, C., & Tang, W. (2023). Data sovereignty and platform neutrality – A comparative study on TikTok's data policy, Global Media and China
[89] European Union (2022). Digital Markets Act (DMA) Legislation
[90] General Data Protection Regulation. (2018). European Union Law OJ L 119,04.05.2016.

business strategies, influencing users in what they should see and what they should interact with, through sharing suggestions that direct the user towards precise digital activities[91].

So, what do these new laws show? It is clear that digital sovereignty is still a major challenge today and that although governments' measures are intended to safeguard national security, they still risk compromising platform almost-neutrality. In the same way, governments must protect their own structures and citizens from any digital manipulation of platforms. This puts governments in a difficult position as they have to balance public interest, platforms neutrality and the protection of human rights in delicate negotiations[92]. One of the most urgent challenges is therefore to maintain, on the one hand, the maintenance of neutral digital platforms and the support of a democratic digital space that protects freedom of expression and free access to information protected by the UDHR itself; on the other, to balance the restrictive and protectionist intervention of governments. This offers a context in which to place the strengthening of digital sovereignty within an up-to-date framework, in which platforms must be regulated, keeping the digital space free and unrestricted to the inviolable freedoms of the world's citizens.

1.3 Theory into Practice: Applying Digital Sovereignty in the Indian Context

The broad concept of digital sovereignty, analysed historically and theoretically so far, finds its own implementation in Indian government policies, especially in recent years. India's path to digital sovereignty post-2013 reflects shared global trends, while demonstrating unique adaptations to its political and economic context. The country has fully ridden the wave of growing interest in the topic and, in an attempt to protect its national security and citizens' privacy from growing fears of surveillance, has implemented relevant data localisation policies that perfectly reflect today's geopolitical needs. The decision to ban TikTok and 58 other apps of Chinese origin is an emblematic case of how the application of digital sovereignty can be exploited as a geopolitical tool to reinforce one's national identity in facing growing external tensions. An unprecedented economic nationalism and struggle for autonomous digital sovereignty sets the stage for placing the 2020 ban on TikTok within a broader framework, in which a social media is a concrete example of a data policy born out of international economic and geopolitical concerns.

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[91] Kaye, D., et al. (2020). The co-evolution of two Chinese mobile short video apps: Parallel Platformization of Douyin and TikTok. Mobile Media & Communication, 9(2) (205015792095212).
[92] Su, C., & Tang, W. (2023). Data sovereignty and platform neutrality – A comparative study on TikTok's data policy, Global Media and China

The India of recent years fits well into an increasingly digital context. Digitisation represents a real turning point for the 21st century for various areas of interaction, from economic exchanges to social relations. Everything is now faster and many contexts can be summarised in simple data to be collected and analysed. In this hyper-connected environment, in the last few years, data has become a strategic asset in many respects, including the economic one in which technology companies use this data capitalism to their advantage, so as to shape strategies and business models in its image and likeness. Often compared to material goods such as oil, data are actually not limited to a specific territory and can cross national borders easily at the click of a mouse. If on one side this characteristic is the beating heart of global digitisation, on the other side, it also causes not a few worries for states which, as mentioned above, see their digital sovereignty threatened for the benefit of technological giants[93]. States, such as India, see this corporate-dominated data flow as a digital threat to their citizens and think that unlimited access to it can lead to a consequent weakening of national security and the digital economy. Although there are different perspectives on the subject, there are still no unanimous international agreements on the regulation of data flows. It is obvious that, on the one hand, large corporations that profit from the flow of data push for regulations aimed at the free movement of data while, on the other hand, many nation-states interpret this freedom as a threat to their state sovereignty and several civil society organisations (CSOs) desire regulation as it hinders the development of state policies and concentrates power in the hands of large corporations[94]. There are many debates on the subject and one policy has emerged that is as relevant as it is controversial, namely data localisation. This policy can be applied more or less rigidly, it provides for data to be stored exclusively within the territory in which it was created, or in a milder form, a copy can be stored locally and then transferred across borders[95] and, possibly, only to countries that share a degree of analogue protection[96]. As explained above, digital sovereignty is a balancing act between external geopolitical affirmation and internal political needs; therefore, each state applies the concept in a completely different way. The motivations behind the request for data localisation are many and obvious but some states, such as the United States, compare it to a kind of "digital protectionism"[97]. According to Vila Seoane (2021), there is a tendency in the West to see data localisation as a limitation of rights and this view is often applied to authoritarian regimes, but

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[93] Vila Seoane, M. F. (2021). Data securitisation: the challenges of data sovereignty in India. Third World Quarterly

[94] CSO Letter Against E-commerce Rules in the WTO. 2019. Civil Society Letter against digital trade rules in the World Trade Organization (WTO).

[95] Selby, J. 2017. Data Localization Laws: Trade Barriers or Legitimate Responses to Cybersecurity Risks, or Both? International Journal of Law and Information Technology

[96] Vila Seoane, M. F. (2021). Data securitisation: the challenges of data sovereignty in India. Third World Quarterly

[97] Vila Seoane, M. F. (2021). Data securitisation: the challenges of data sovereignty in India. Third World Quarterly

this does not really explain why many democratic countries in the Global South, such as India, are exploring these policies to safeguard their internal security and economy.

The Indian case is interesting under different perspectives. First, because it is the first case of a national ban on TikTok that has had such resonance and symbolic significance as to have consequences in the international geopolitical balance with China, and beyond. But it is also extremely stimulating in this field, since, as described by Vila Seoane in his analysis, while being a democratic country closely linked to the US technology sector, has nevertheless acted in favour of localisation-oriented policies since 2018. The question many scholars have asked is why a country in India's position should put its trade partnerships with the US at risk for sharply contrasting measures. According to the literature, data localisation would reflect a new form of resource nationalism, also called data securitisation, influenced by political and economic needs of each nation-state. Returning to the fundamental concept of digital sovereignty, the series of measures adopted by India since 2018 would show just how the Asian government is pushing towards a new type of narrative in which it portrays itself as an emerging and independent power in the technology sector. The case of TikTok is an emblematic example of how the geopolitical securitisation of data has helped to strengthen Indian state control over its digital market and build its national identity, but also to exacerbate tensions in the global scenario.

To get the case of the TikTok ban in depth, however, it is first necessary to analyse how India has approached and personalized the concept of digital sovereignty within its domestic and foreign policies. To analyse the Indian digital approach, it is essential to introduce in the first paragraph the theoretical concept of data securitisation, a conceptual framework in which the first nationalist policies and narratives of the resource economy are formed. Also highlighting how the new value of the data has required an adaptation of resource management measures. Going even deeper, in the second section we will analyse what kind of data securitisation has been adopted with the Modi government in recent years, highlighting the role of data localisation in three key measures for Indian data governance. This section is useful to understand that Indian policies are not the result of domestic authoritarianism, but rather complex geopolitical necessities. Finally, it will be highlighted how these initiatives and political narratives have actually achieved a broad consensus within the country, thanks to a strong narrative based on the struggle against colonialism, this time digital, perceived as a threat to the country's internal structures and citizens. The objective of this sub-chapter is to lay a solid foundation for understanding and then analysing the context in which TikTok's ban has successfully established itself, with strong internal support.

1.3.1 Conceptual Framework about Data Securitisation

The theoretical basis of data securitisation is based on different perspectives used to describe the international political economy of resources. These perspectives divide along two main approaches, namely realism and liberalism. From one perspective, realistic theory considers states as constant actors in an inevitable competition for control of the resources of a territory. From another perspective, the liberal theory offers a different approach, in which the international structure formed by rules and institutions instead favours mutual cooperation between states. Yet, the previous sections have largely stressed that a state-only approach is not sustainable in modern societies, as other elements such as domestic politics and the role of private individuals must also be considered[98]. It is in this context that Wilson suggested in 2017 that in truth the level of securitisation that a government adopts is an indicator of the nature of policies it applies, whether they are nationalist or liberal. The concept of securitisation comes from the Copenhagen School, where security is defined in principle as a speech act, where there is initially a speech which aims to convince the recipient that a potential threat exists ("securitisation move"[99]) and, consequently, if the speech is successful then certain extraordinary measures to protect from potential danger can be justified ("successful achievement of securitisation"[100]), implying a mutual admission of the existence of a threat. In case the threatened context is economic, the so-called "resource nationalism"[101] is applied, to use local resources to ensure the development of state objectives.

Furthermore, according to Wilson (2017), two main factors can be the cause of a policy of securitisation of resources. The first determining factor is that this is more likely to occur during an exponential growth of the domestic market, rather than during a moderate period. The second factor, on the other hand, confirms the theories developed so far, that is that the context in which securitisation policies can be developed varies according to the political, economic and geopolitical issues of each state. The more unstable the political institutions, market and geopolitical environment, the more likely it is that resource securitisation measures and extraordinary measures will be implemented. In this scenario, economic security plays a very crucial role, as both resource-producing and resource-consuming countries tend to fear a co-dependency and exploitation relationship.

To conclude this conceptual framework, it is essential to consider some changes in order that this securitisation policy to be effectively applied to data. First, according to Vila Seoane

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[98] Vila Seoane, M. F. (2021). Data securitisation: the challenges of data sovereignty in India. Third World Quarterly
[99] Vila Seoane, M. F. (2021). Data securitisation: the challenges of data sovereignty in India. Third World Quarterly
[100] Vila Seoane, M. F. (2021). Data securitisation: the challenges of data sovereignty in India. Third World Quarterly
[101] Vila Seoane, M. F. (2021). Data securitisation: the challenges of data sovereignty in India. Third World Quarterly

(2021), although it has been recognised that data have an economic value and there are various proposals on this topic, data is still recognised as intangible in the market. Therefore, the cycle of a given market cannot be a trigger for data securitisation. Secondly, it must be remembered that the securitisation of resources is a political discourse and aims to support national objectives about their own digitisation policies[102]. Third, Wilson states that to apply data securitisation to the current context it is necessary to include non-state actors, whether public or private, national or international, as they also play a role of interest in resource management. Now that this picture has been outlined, one can place the Indian case inside it, understanding why it took certain pre-TikTok ban political choices.

1.3.2 Data Localisation as the Indian Path to Digital Sovereignty

So, how did data securitisation in India express itself, considering its domestic national needs in political and economic terms? To get to today, the reader should know that since 2014 India is led by the Bharatiya Janata Party (BJP), whose leader and Prime Minister, is Shri Narendra Modi[103]. The BJP is historically associated with a tendency towards nationalist policies[104], mainly economically, but since it took power, it adopted more differentiated policies. Prime Minister Modi also promised strong policies and rapid economic growth for the country before taking office. Among these promises, the idea of a digitalization of the country was also put forward which has been developed on the basis of initiatives such as the Digital India Initiative and the Make in India[105], encouraging the use of information technologies and local technology, and establishing the AI Task Force in 2017[106]. Nevertheless, the dissatisfaction with these policies was growing and in 2019 the Indian government introduced new data localisation policies, directing the country towards a new chapter of digital economic nationalism in which "data is the new gold"[107].

From 2018 onwards, India will see a rapid shift in attitude towards its digital infrastructure and data flow policies, leaving the liberal vein in favour of an attitude of closure. The Indian government soon adopted three key initiatives for the new data localisation policy. The first relevant localisation policy was the resolution issued by the Reserve Bank of India on 5 April 2018[108]. Motivated by the rapid expansion of digital transactions and a consequent need for

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[102] Koch, N., and T. Perreault. 2019. Resource Nationalism. Progress in Human Geography
[103] India Government. National Portal of India.
[104] Bharatiya Janata Party. Our National Identity: Cultural Nationalism.
[105] Vila Seoane, M. F. (2021). Data securitisation: the challenges of data sovereignty in India. Third World Quarterly
[106] Vila Seoane, M. F. (2021). Data securitisation: the challenges of data sovereignty in India. Third World Quarterly
[107] Hindustantimes (2019). 'Data is the new oil, new gold,' says PM Modi in Houston. New Delhi, India.
[108] Reserve Bank of India (2018).Storage of Payment Systems Data.

security control, the directive required payment service providers to retain data within Indian borders. India's Data Protection Bill[109] was another very important initiative for the date localisation. Following the 2017 Supreme Court ruling[110], where privacy was recognised as a fundamental right, it became clear that data protection was an essential element for the progress of India as a state. The judgment provided for a ban on transfer of "critical personal data"[111] outside the country, because it seemed necessary to protect users' data from foreign surveillance, especially after Snowden's revelations about foreign activities. Although the level of criticality of this data was not clear, the recommendation was made with the aim of upgrading their own local infrastructure and data processing[112]. Later in 2019, a proposal for an e-commerce policy[113] aimed at the data localisation, as keeping the data within the national territory meant great economic benefits for the development of the country, but above all for the citizens and local businesses[114]. The great luck for these data localisation policies lies in the "successful achievement of securitisation" phase of the speech act. The fact that many interest groups, both in and outside the country, have supported the initiatives has meant that technology companies also found a great opportunity for growth in these measures. Foreign tech giants such as "Alibaba, Gionee, TikTok and Kaspersky Lab"[115], have been cooperative towards the country's decision-making choices as they are subject to similar data localisation measures in their home countries[116]. Very far from the liberal norms of western countries like the USA.

That being said, India's data localisation process is a case study of resource nationalism in a democratic country, again demonstrating the versatility of digital sovereignty but above all the fact that nationalistic policies are not due to the fact that India is an authoritarian country but rather because of complex geopolitical necessities. Here, state and non-state actors have demonstrated strong support for measures that strengthen the country's self-sufficiency in data control, underlining that these are crucial not only to India's national and economic security, but also for its identity construction as a powerful country.

[109] Vila Seoane, M. F. (2021). Data securitisation: the challenges of data sovereignty in India. Third World Quarterly
[110] Supreme Court Observer (2024). Fundamental Right to Privacy
[111] Srikrishna Committee (2018). Free and Fair Digital Economy: Protecting Privacy, Empowering Indians. New Delhi, India.
[112] Vila Seoane, M. F. (2021). Data securitisation: the challenges of data sovereignty in India. Third World Quarterly
[113] Department for Promotion of Industry and Internal Trade. 2019. Draft National e-Commerce Policy: Indians' Data for India's Development. New Delhi, India: Ministry of Commerce and Industry.
[114] Department for Promotion of Industry and Internal Trade. 2019. Draft National e-Commerce Policy: Indians' Data for India's Development. New Delhi, India: Ministry of Commerce and Industry.
[115] Vila Seoane, M. F. (2021). Data securitisation: the challenges of data sovereignty in India. Third World Quarterly
[116] Vila Seoane, M. F. (2021). Data securitisation: the challenges of data sovereignty in India. Third World Quarterly

1.3.3   Resisting Data Colonialism: A Strategic Narrative

This last section describes the present and the future of the Indian technology sector, witnessed by a past not too remote, in which the data sovereignty is perceived also as a tool for preserving one's own identity and digital structure as a Nation, opposing the so-called "data colonialism"[117]. The term used by the scholars perfectly describes the meaning that it was intended to convey, namely the concentration of data in the hands of powerful foreign technology companies, mostly American and Chinese, which exploit them for their own political and economic advantages[118]. The fear, perceived by many states of the world as well as those of Europe, as demonstrated by the complaint of Angela Merkel against excessive control over data by a few private individuals[119], has received much attention also in India. Digital incidents like the Snowden case and Cambridge Analytica[120] undermined the country's trust and increased awareness of data control and breaches of platform neutrality. A country like India, which has always fought against various forms of colonialism, is now perceiving digital sovereignty not only as an economic issue but also as a geopolitical threat in the broadest sense. India's digital sovereignty is a right that must be respected if it wants to preserve its national identity and build a state free from foreign influences.

This nationalist sentiment is not really new. Politicians, like Vinit Goenka, saw data sovereignty as "information which has been converted and stored in binary digital form is subject to the laws of the country in which it is located"[121] already in 2014. A phrase that underlines the powerful narrative that was already being established in those years. According to Goenka, digital sovereignty was a key geopolitical tool for avoiding the people's mind enslavement[122]. The political narrative was clear, data colonialism was an obstacle for building India as an emerging power in the global digital scenario and there were few foreign multinationals exploiting it for their own advantage. So, the only solution is data localisation. Aruna Sundararajan, former Secretary of State for Telecommunications and Chairman of the Commission on Telecommunications, also made a compelling case for the exploitation of Indian data and networks by profit-seeking advanced countries. Sundararajan highlighted how data retention within India's borders was necessary for the country to benefit Indian

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[117] Couldry, N., Mejias, U. A. (2018). Data Colonialism: Rethinking Big Data's Relation to the Contemporary Subject. Television & New Media.

[118] Chazan, G. (2019). Angela Merkel Urges EU to Seize Control of Data from US Tech Titans. Financial Times

[119] Chazan, G. (2019). Angela Merkel urges EU to seize control of data from US tech titans. Financial Times

[120] Vila Seoane, M. F. (2021). Data securitisation: the challenges of data sovereignty in India. Third World Quarterly

[121] Han, T. (2023). India's Search for data sovereignty.

[122] Vila Seoane, M. F. (2021). Data securitisation: the challenges of data sovereignty in India. Third World Quarterly

citizens[123]. Echoing in the Indian political scene is the Minister of Foreign Affairs, Subrahmanyam Jaishankar, confirming that data management policies are crucial for the development and achievement of India's aspirations to become a world power[124]. The same private Indian companies have embraced the narrative, such as Mukesh Ambani, an Indian entrepreneur and president of Reliance Industries Limited, who asked Modi to adopt policies in favour of data retention within the country[125] and comparing the fight at data colonialism to that of Gandhi[126].

Paradoxically, even though India's technology sector contributed 7.7% of the national GDP in 2017[127], the country did not have digital platforms of international relevance. This is extremely important because, in today's environment where advanced technologies are developing rapidly and generating a large data-driven market, it shows the low development of the technology sector in India. Consequently, the most critical of data colonialism feared that this situation could severely limit the development of Indian digital infrastructures in future and, to counter this phenomenon, the solution was clear: support the construction of local infrastructures such as "data centers"[128], to promote the digital sector and national goals of economic growth and identity building.

As confirmation of an increasingly strong action by India to embody not only a model for the Global South but also for the whole world, as we will see later in the chapter dedicated, its determination has also been reflected in international debates on digital sovereignty. This is the case at the G20 in Osaka, where the Indian government strongly opposed a US and Japanese initiative of Data Free Flow with Trust[129]. "Data also needs to take into account the requirements of developing countries"[130] former Foreign Secretary Gokhale said. Also supported by Ravi Shankar Prasad, former Minister for Electronics and Information Technology, who sees India as a world model and new digital power capable of balancing security but also privacy[131]. Indian opposition to policies that could undermine its digital sovereignty is actually not new. Already in the context of the World Trade Organization

[123] Sengupta, D., and G. Aulakh (2018). Data belonging to Indians must reside within the country: Aruna Sundararajan. Economic Times
[124] The Print (2019). Data Security Is Linked with National Security: Foreign Minister S Jaishankar.
[125] Punj, S. (2017). India Today Conclave 2017: Mukesh Ambani pitches for 'keep in India'. India Today.
[126] Economic Times (2019). Mukesh Ambani urges PM to take steps against data colonisation.
[127] Press Information Bureau. 2019. Commerce & Industry Minister holds discussions with CEOs of Indian IT Companies; urges them to explore new markets.
[128] Vila Seoane, M. F. (2021). Data securitisation: the challenges of data sovereignty in India. Third World Quarterly.
[129] Centre for International Governance Innovation (2023). In India, Data Protection Is Expanding State Power.
[130] Press Trust of India (2019). India Counters Donald Trump on Digitisation, Calls Data 'New Form of Wealth'. Ndtv. New Delhi, India.
[131] Prasad, R. S. (2018). Data Protection Committee Press Conference. Youtube.

(WTO), where since 1998 it has established a moratorium against duties on cross-border data flows promoting free trade and digital economy[132], India opposed arguing that this was hampering growth in emerging countries[133].

These first steps from the Indian government demonstrate how the country has been trying for many years to emerge in the digital sector dominated by large US and Chinese platforms. Aware of the limited space devoted to emerging powers and the accumulation of data power in the hands of a restricted number of multinationals, India has seen digital sovereignty as an opportunity for national rebirth, aspiring to take the role of democratic leader for the Global South. Its ambitions as an alternative to the US and China are supported within the country, which has created fertile ground for the emblematic case study of digital sovereignty as a geopolitical tool that the thesis will discuss in the next chapters.

Conclusion of Chapter 1

This thesis started with a first chapter that aimed to introduce the concept of digital sovereignty, highlighting that it is not only a tool of state control, but also a key element in interpreting contemporary geopolitical dynamics. During the path just traced, from its more classical historical origins to the modern needs of cyberspace, it was underscored a development of the concept of digital sovereignty that continues to play a fundamental role in the contemporary geopolitical scenario. In this in-depth analysis, it is evident that digital sovereignty is not just a natural extension of the classical theory of sovereignty, but rather its declination in a globalized and hyper-connected context. As technologies have advanced in recent decades, nation-states have progressively perceived the necessity to maintain state control over their digital infrastructures, threatened by foreign tech giants and data protection concerns, national security and the autonomy of its own national technology market. In this new geopolitical arena, therefore, cyberspace has become a reality where new state policies are being established and where heated debates about the role of data governance are becoming increasingly relevant.

In the first sub-chapter, the historical exploration of the concept of digital sovereignty had an introductory purpose which highlighted how the very term of sovereignty has been questioned on several occasions, until the cyber sovereignty of the nineties and the consequent support for cyber exceptionalism, in which it pushed towards a decentralized management and a more independent space for the new digital ecosystem. Yet, nowadays, we know that the role of the state has been reborn, mainly due to the strong fears that the emergence of the Internet has brought with it. In the post-2013,

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[132] World Trade Organization. Electronic Commerce: Briefing Note.
[133] Vila Seoane, M. F. (2021). Data securitisation: the challenges of data sovereignty in India. Third World Quarterly.

since Snowden's revelations about foreign surveillance activities, the fear of external control over its own citizens and data has become increasingly powerful. The response to the situation was almost unanimous, also democratic states of the world have started a process of closing to that transnational and free Internet, promoting the re-affirmation of its authority within the territory and encouraging digital sovereignty as a new tool for national protection. Subsequently, a detailed study on the search for a unique definition and its division into different dimensions of analysis, has highlighted the complexity of digital sovereignty from national security to the economic role of data. But also underscored the multifaceted nature beyond-State, which is also relevant to its citizens and private technology companies. As described in the thesis, the greatest challenge for a democratic state is to balance its interests with the protection of the individual rights and the maintenance of platform neutrality, guaranteeing protection but also freedom of action in the digital market. However, in the real world of internal and external geopolitical tensions, these challenges are reflected in the global debate on the fate of digital platforms and reveal a context where it is difficult to balance the neutrality of digital networks, free access to the Internet and protectionist intentions of states threatened by external pressures. In this first chapter, the case of the ban of TikTok by the Indian government appears emblematic. In fact, the last sub-chapter shows how, after 2013, the country has applied digital sovereignty in policies that seem to effectively balance citizens' rights and the development of local technology enterprises, but which also seems to reflect protectionist measures synonymous with fragility and fear of the American and Chinese tech giants. Through a policy of data localisation and a strong nationalist narrative, India was the first country in this sense to demonstrate how digital sovereignty can be used not only as a protective measure, but also as a means of geopolitical imposition and national identity building. The third sub-chapter, however, is only a first introductory reference to the Indian case which will be analysed in depth later.

The objective of the first chapter is therefore clear and essential, that is to lay the conceptual foundations for understanding how the notion of digital sovereignty can be applied in practice depending on the context, highlighting its limits, challenges but also the opportunities it brings with it. The reflection on "splinternet"[134], or the fragmentation of cyberspace, highlights the importance for a state to balance its national interests with global demands, opening an eternal debate about the application of digital governance. Digital sovereignty is therefore proving itself not only as a control tool, but also as a key to the analysis of power relations between states in current and future geopolitical scenario. However, to really understand how this concept applies at a first abstract glance, it must be put into practice through a more contextualized analysis. And this is where TikTok, the

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[134] Su, C., & Tang, W. (2023). Data sovereignty and platform neutrality – A comparative study on TikTok's data policy, Global Media and China.

social media that represents the intersection of excellence between technological and geopolitical dimension, between digital challenges and concerns regarding digital sovereignty, comes into play. For this reason, the next chapter will focus on the object of the thesis, taking into account its origins, its main characteristics and the reasons behind its initial enormous global success. Through a detailed path highlighting its features, business strategies and security concerns, it will build the role of TikTok as a central topic in the global debate that still echoes today about digital sovereignty, national security and geopolitical dynamics. The strategic passage of the thesis aims to make more tangible and more understandable for the reader the real implications of the adoption of digital sovereignty by a state, in this case India, offering the study's target audience a comprehensive view that links digital platforms to geopolitical tensions between states.

CHAPTER 2: TIKTOK'S ORIGINS, FUNCTIONING AND CONCERNS

Nowadays, apps on our smartphones facilitate and govern our lives. There is an application for everything on the market, but not all of them achieve the ideal level of success and maintain it over a long period. This is the case of many apps we know. Think of Vine: in 2013 it was definitely a promising platform, a simple short format video sharing app that allowed users to share six-second loop videos[135], which became immediately popular, reaching unprecedented numbers of users, up to 200 million[136]. Vine was the founder of comic content creation and created important influencers that are still known today. Yet, Vine did not keep up with platforms like Instagram and YouTube, which offered better features and opportunities for creators to monetize, and a migration of creators was inevitable. So, within a few years of its appearance on the digital market, Vine was closed in 2017. On the other hand, there are also apps that have the same functionality and are just as useful and efficient, but remain unknown to the world. This is the case, for example, of Slingshot, an app for instant messaging that allowed to share videos and photos like Snap but, after only three months of life, was closed[137]. This is not the case with TikTok. Founded in 2016, alongside time-honoured giants like Facebook and WeChat, it has been the fastest growing digital platform, and its continued success promises an uncertain but still prosperous future in many areas of the world.

But what makes TikTok so special? And, most importantly, what are the elements that keep it so popular among people of various ages and cultures? In this second chapter we will try to answer this first and essential question, in order to give a first basis of analysis towards what the thesis will deepen later. To understand what the common thread may be that makes the world fascinated by the features of TikTok, we must focus on the first part of the thesis on the functionality of the platform and its marketing strategies. At the same time, analyse the threats and opportunities of the app, so as to make clearer the reasons behind the rapid expansion of TikTok and anticipate its development in the next chapters. In this chapter it is therefore fundamental to research the origins of the object of study and trace its evolution from launch to world success, finding its root precisely in its functions and characteristics. In order to define its history and functioning so clearly, it is essential to divide the chapter into three other sub-chapters. The first one aims to highlight the first steps of the parent company that launched it, starting from the Chinese Douyin app until its worldwide launch, including its strategies for penetrating the world market and the tactics used to face competition. The second aims to investigate the reasons behind its enormous success, analysing the innovative technologies that have succeeded in entertaining billions of users and the marketing strategies that allow their

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[135] Dew, A. (2024). The Rise and Fall of Vine. Medium.
[136] Rowell, C. (2020). The rise and fall of Vine: A brief timeline. BusinessChief.
[137] Wu., J. (2021). Study of a Video-sharing Platform: The Global Rise of TikTok. Massachusetts Institute of Technology.

positioning. Finally, the third sub-chapter is the most important concluding and explanatory part of the chapter, as from the basic information provided it is possible to trace and understand the reasons behind the security concerns of countries around the world, regarding data security and political manipulation of the app.

2.1 History and Development of TikTok

Before start introducing the birth of TikTok, it is also necessary to mention the creation and evolution of the society that gave birth to it. The latter is the renowned ByteDance, a Chinese company founded in 2012 in an apartment north of Beijing by its founder and computer engineer of just thirty years, Zhang Yiming. The young entrepreneur, with his innovative insight to leverage big data and AI to show content to users based on their preferences and improve their experience, has made the company a technology giant as it is recognized today. In particular, the visionary idea of making the social experience hyper-personalized was the turning point for ByteDance, distinguishing it among the many other companies in the economic scenario and earning the nickname "app factory"[138], to highlight how strong the company's production and innovation capacity in the technology sector could be.

One of the first and most popular successes for the company is Jinri Toutiao ("Today's Headlines")[139], an AI-based news aggregator that has quickly gained success in China, establishing itself as one of the most popular news apps in China[140]. Originally, Toutiao focused more on news related to the Chinese market. What set it apart from other news applications was definitely the use of AI technology. That is, to optimize content recommendations to users, the engineering team of the app used the algorithm based on how much and what news users read, providing more personalized content. Toutiao's strength was that it did not just offer the most recently read or published articles, but also monitored each user's interest in certain content and suggested similar ones that were more compatible with their preferences. This type of technology has made the app extremely attractive for digital audiences, confirming ByteDance in the technological landscape. In addition, over time Toutiao has developed and expanded the range of content offered by providing all kinds of information, such as microblogs and videos, gradually becoming a multifunctional platform. This expansion has led to such a development for the company, giving it an equally unique economic advantage in the sector, that ByteDance has had

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[138] Kuo & Timsit (2024). What to know about TikTok owner ByteDance as Congress approves possible ban. The Washington Post.
[139] NBH (2024). What is Toutiao.
[140] Kuo & Timsit (2024). What to know about TikTok owner ByteDance as Congress approves possible ban. The Washington Post.

to revise its identity as well. ByteDance, initially known as Toutiao, has gone from being a single market news app to downgrading the news app name to one of the general brands and becoming the thriving ecosystem recognized under today's name ByteDance[141]. This strategy of expansion has been the turning point for Chinese company, as it is set to become a much more relevant reality in the international digital scene thanks to the upcoming TikTok.

To effectively complete the overall picture of TikTok's historical background, it is vital to present its birth and development in sequential order, with reference to Wu (2021). First, the paragraph aims to explain what were the very first steps taken by the parent company to create and to promote TikTok internationally. Next, highlight the winning strategies of the company to make an app of Chinese origin penetrate in such a competitive and western market. Finally, it is essential to emphasize the tactics that have been used to make TikTok a valid, and winning, opponent in technological and economic competition with other apps, making it one of the most popular apps at the global level nowadays.

2.1.1 The Birth of TikTok

Moving on to more recent years and apps geographically closer to the West, ByteDance is best known for creating TikTok. Launched in 2016 in China under the name of Douyin and then reintroduced internationally in 2017 under the name TikTok, the app is one of the most popular platforms today for sharing short, medium-length videos and live. Thanks to the great access to filters, music and effects, TikTok grew rapidly. According to statistics, the social platform became the most popular app in 2019 and 2020, reaching 693 million and 850 million downloads respectively. At the end of 2023, it was also estimated that TikTok had over 1 billion active users per month and that it is expected that by the end of 2024 they will reach 1.8 billion[142]. But why did ByteDance target the global market with TikTok? The answer can be found in Yiming's statements at the press conference of the 2016 Third World Internet Conference. The founder said that TikTok was set to grow according to the company's business strategies, which would aim for globalization in that year. China could not be enough. The Chinese population that used internet was only one fifth and the way to grow and remain valid in the market would be to draw from the entire population of the world, as "only products with global allocation of resources and pursuing scale effects can be competitive"[143]. This is why, from Douyin they switched to TikTok in May 2017. Initially,

[141] Wu., J. (2021). Study of a Video-sharing Platform: The Global Rise of TikTok. Massachusetts Institute of Technology.
[142] Iqbal, M. (2024). TikTok Revenue and Usage Statistics. Business of Apps.
[143] Wu., J. (2021). Study of a Video-sharing Platform: The Global Rise of TikTok. Massachusetts Institute of Technology.

covering only the Asian market. For the European and American markets, there was another player that hindered the rise of Douyin, namely Musical.ly, launched in 2014 by a team from Shanghai, also this app aimed to promote the sharing of short video content. Although the social platform was originally Chinese, it has hugely conquered the US market, thanks to its monumental success among teenagers, in fact, as the article by Vice explains "approximately 50 million people under the age of 21—or roughly half of the teens and preteens in America— are on musical.ly"[144]. So, while Douyin failed to conquer the western market, Musical.ly has won the record but not managed to do the same in his native country. And this is where TikTok comes in.

2.1.2 TikTok's International Development Strategies

Having said this, although TikTok has been able to achieve global success quickly, its success is due mainly to three factors.

The first step towards conquering the US and, consequently, the global market by ByteDance was certainly the acquisition of competitors[145]. In this sense, the most significant action was the assimilation by the Chinese company of Musical.ly in 2017, at the time still very popular. ByteDance, aware of the competitor's dominance in Western markets, had two options: use TikTok to face the social colossus directly or use its own capital to create a strong alliance. As we know, the second choice was the winning move. Because, even if the media at that time thought a billion-dollar acquisition was excessive, forsooth the value that this assimilation brought to TikTok was unmatched over the long term, opening up markets all over the world to the Chinese company. Shortly after, in August 2018, the imminent closure and integration of Musical.ly to TikTok was confirmed. In essence, nothing would have changed for the average user. The user could simply update the app, log in to his account and find all his contents, with the only change that he would no longer be a Musical.ly user but a TikTok user. This has been extremely profitable, as the data show: "TikTok revealed its monthly active users have grown nearly 800% since Jan. 2018, when the application was used by about 11 million Americans. About a year later, that figure had more than doubled to about 27 million"[146] reports the article by CNBC.

Another method used by ByteDance to penetrate the global market is to locate transactions. This strategy allows to manage the foreign market penetrating and conforming

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[144] Friedlander, E. (2016). Teen-Focused App Musical.ly Is the Music Industry's New Secret Weapon. Vice.
[145] Wu., J. (2021). Study of a Video-sharing Platform: The Global Rise of TikTok. Massachusetts Institute of Technology.
[146] Sherman, A. (2020). TikTok reveals detailed user numbers for the first time. CNBC.

to the different cultures of each country. In particular, for each market, TikTok introduces easy content that can be adapted to a given country and analyses its cultural characteristics, trying to deepen its peculiarities and conforming. It then studies the preferences of local users and shapes its content to reflect the needs and interest of the public in the local region. It is true, that there is no single version of TikTok for the whole world, but each country has its own culturally adapted version. This is because all versions of TikTok must be culturally aligned to the country they refer to: TikTok Indonesia will never be the same as TikTok Brazil, as they refer to users from different cultures, interests and humor[147].

Finally, to make what TikTok is today global, ByteDance uses the technique of exploiting other platforms. More simply, TikTok has exponentially used its advertising resources in a targeted and clever way, exploiting the already giants of social media. TikTok, in fact, has invested significantly on ads through apps used by younger people such as Facebook, Instagram and Snapchat, also collaborating with influencers and bloggers to position its promotional campaign in their videos[148].

2.1.3   Facing Competitors on the Tech Market

That said, as noted above, the acquisition of Musical.ly was a winning move for mainly one reason: TikTok no longer had any viable competitors in the short-video global market. Musical.ly was the leader in the rankings until then and, after TikTok landed in February 2018 on the US market, it was the ByteDance app that had the record. In fact, after a few months since its launch, in September 2018, TikTok had already surpassed, in terms of daily downloads, the "four big" social networks, namely Facebook, Instagram, YouTube and Snapchat[149]. After TikTok, thanks to its corporate strategies, has successfully entered the Western market, there is still a question: how did it stay there and bypass apps that have been in use for longer? The answer lies in their functions. That is, although the four downgraded social media had built-in features for short videos, these were not of interest to users, as they were hidden by many other different functions of the app. The wide variety of features has led users to consider the option for short videos as an addition, unlike TikTok, or Musical.ly, which focuses entirely on sharing the latter. In its apparent simplicity, TikTok has therefore attracted a lot of attention, so much that it has led other social media to conform to it. They say that imitation is the sincerest form of flattery and probably must be true, because in a

[147] Wu., J. (2021). Study of a Video-sharing Platform: The Global Rise of TikTok. Massachusetts Institute of Technology.
[148] Wu., J. (2021). Study of a Video-sharing Platform: The Global Rise of TikTok. Massachusetts Institute of Technology.
[149] Perez, S. (2018). TikTok surpassed Facebook, Instagram, Snapchat & YouTube in downloads last month. TechCrunch.

short time all the social giants have started to highlight their functions of sharing and creating short videos. Instagram was one of the first, integrating among its main functions Reels, composed of short videos, just like TikTok. And being Facebook also a product of Meta, the Reels section can be found on this platform. Another striking example was YouTube, which launched on the home page the so-called Shorts[150].

The rapid growth of TikTok and its ability to win the competition is not only due to its functions, but also to corporate strategies. First, TikTok continues to strengthen and innovate its content, making it more entertaining and interactive for users. In addition, TikTok collaborates wisely with third parties to provide a better user experience. The TikTok for Developers[151] program provides tools to help users make the most of TikTok's technology and includes "development kits like Login Kit, Share Kit and Green Screen Kit as well as our API references like Display API, Content Posting API and Research API"[152]. In particular, TikTok works with advanced technology tools from partner companies such as Adobe and CapCut to improve and facilitate users' editing skills. In addition, to make the experience more creative for creators TikTok has expanded its music copyright section with Merlin, Sony Music Entertainment and Universal Music Group[153], trying to make its position dominant despite the presence of more longstanding platforms in the music industry, such as YouTube.

The fact that TikTok was able to dominate so much and so quickly the technology industry and global market was definitely thanks to the business lines that were operated by ByteDance. In 2020[154] and in 2022[155], TikTok was the most downloaded app globally and, to date, worldwide app downloads in Q4 of 2023 have reached 232 million[156]. However, despite its still great success among the new generations, the times and geopolitics are changing the fate of the social colossus. TikTok has outperformed the social media giants, but it remains to be seen whether it will overcome new geopolitical obstacles.

2.2 Description and Functioning

If in the previous paragraph we have laid the foundations for an initial analysis about what TikTok is, the objectives it has achieved and, above all, through which strategies it has achieved

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[150] Harkavi, A. (2021). Social Platforms Are Emulating TikTok. StreetSense.
[151] TikTok for Developers Web Site.
[152] TikTok developer products, TikTok Help Center.
[153] Wu., J. (2021). Study of a Video-sharing Platform: The Global Rise of TikTok. Massachusetts Institute of Technology.
[154] TikTok named as the most downloaded app of 2020 (2021). BBC.
[155] Ceci, L. (2024). Most downloaded mobile apps worldwide 2022. Statista.
[156] Ceci, L. (2024). TikTok - statistics & facts. Statista.

them. It is essential in the second paragraph to go deeper than the actual structure of TikTok, to fully understand the criticisms surrounding this issue. Seemingly simple and intuitive, TikTok actually has a complex and not entirely transparent mechanism that underlies the complex situation that the Chinese app is facing today, about accusations aimed at data security and user privacy. So, in order to analyse what triggered the global debate, which led up to the partial or total ban of TikTok, it is necessary to explain where the advanced technology that has fascinated the world's population ends and where the exploitation of personal data and the threat to international security begin. TikTok, thanks to a sophisticated use of the algorithm and functional processes based on AI, has gained a leading position in the technological market. Yet, international concerns stem from these innovative technologies. In fact, the accusations at a global level, as the thesis will analyse later, mainly concern the way sensitive data is handled and any influences and manipulations that can be applied through the app. To fully understand the rationale behind the bans imposed by various countries, it is necessary to delve into the more technical side of the object of study, namely the functioning of TikTok's advanced technologies, between innovation and threat. This dualism between progress and risk can only be introduced through the summary explanation of the app's functioning.

To do this, the sub-chapter should be subdivided into other paragraphs, each dedicated to different key aspects. The analysis is organized in a logical and sequential way, as the first paragraph explores the technological heart of the app, namely its recommendation system based on a powerful algorithm, demonstrating how the technologies used are able to interpret so accurately the interests and needs of each user. Secondly, the thesis will focus on how data is collected, stored and located. A focal point to highlight how TikTok applies so differently to regulatory requests in different areas of the world. Finally, it is also relevant to mention the business model with which TikTok gets the highest revenues and the reason why so many creators and brands refer to this platform. Each section will be structured to provide a complete overview, then delve into specific aspects, so as to make the topic and language accessible even to those unfamiliar with the subject.

2.2.1 How TikTok Recommends Videos #ForYou

"TikTok's mission is to inspire creativity and bring joy"[157], in this way begins the official TikTok blog page that clearly and transparently exposes the functional mechanisms behind the giant of short videos. The TikTok blog, from the very first lines, makes it clear that the

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[157] TikTok Blog (2020). How TikTok recommends videos #ForYou.

ForYou feed is the real essence of the app, and it's true. So, let's start here. Its feed is critical throughout the experience and it's where users spend most of their time. But what makes TikTok's feed so addictive[158]? At a first glance it looks like feeds from other social already seen. There are videos and photos that are offered to the user where you have to scroll up and down to change content, just like a normal Instagram feed and other apps based on recommendations. Yet, TikTok acts differently. In fact, as soon as the user opens the app, he is in the ForYou feed, where "you're presented with a stream of videos curated to your interests, making it easy to find content and creators you love"[159]. Unlike other social apps, such as Instagram, where the recommendations on the feed are based on explicit interests that the user expresses, namely through their interactions, followers and followers. TikTok does not give this option, or rather, it is not its main one. The Chinese app is based on the absence of a ForYou feed, replaced by a constant and infinite stream of videos selected by the algorithm, mainly from unknown creators to the user, even in languages other than the default one[160]. TikTok's distinctive feed is unique precisely because it creates a custom feed for each user, which cannot and should not be the same as any other "through a 'recommendation engine' using artificial intelligence (AI) technologies and data mining practices"[161]. Actually, recommendation systems are used everywhere and take into account the user's preferences through their simple and instinctive interactions. However, the TikTok blog claims to use a complex mechanism of combining various factors. Recommendations evolve and become more defined as the user interacts. The recommendations are based on three main types of factors. First, the user's interactions, which are basically the videos you like, the content you comment on, what you share, the accounts you follow and what you post. Second, the information provided by the video, such as sounds, hashtags and captions. Finally, the settings of your account and device, that is basic information like the country you live in and the language you speak, but this does not preclude watching videos of people from other cultures and nationalities. It is also clear that each factor does not have the same weight. The interest indicator can be more or less strong. If a user is watching the entire video, it's a stronger indicator than that a creator and a user can be compatriots. It is also unique that on TikTok, although it is more likely that a creator with more followers can have more views, any person

[158] Herman, J. (2019). How TikTok is Rewriting the World. New York Times.
[159] TikTok Blog (2020). How TikTok recommends videos #ForYou.
[160] Congressional Research Service (2023), TikTok: Technology Overview and Issues.
[161] Congressional Research Service (2023), TikTok: Technology Overview and Issues.

could become viral, as followers and previous video publications are not decisive factors in the recommendation system[162].

2.2.2 How TikTok Manages Data

Data collection:

In order to analyse what is known about the collection of data and the use that TikTok makes of it, it is necessary to start from what the Privacy Center of TikTok states in the Privacy Policy. Following recent bans in different areas of the world, TikTok has been working to make our privacy policy even more transparent. The latter can be found in three different versions on the site. The first version is related to the U.S., updated on 19 August 2024[163]. A second version is addressed to the European Economic Area, United Kingdom and Switzerland, updated on 19 November 2023[164]. Finally, a version has been created for the other regions outside of the above areas, updated on 10 June 2024[165]. However, a less exhaustive list has been released on the official website of the Privacy Center, which cites some examples of the information that TikTok collects, including:

- Basic information provided by the user when creating his account, such as username, age and phone number;

- Any content generated on the account used, such as video, photo, audio, hashtag and live;

- If permitted by the user, user's social media contacts;

- Under user's permission, TikTok may collect information about the geographic location through location services. Plus, location information can use GPS data, cell phones and Wi-Fi networks;

- The search history;

- Information about the device, such as model, operating system and its basic settings, such as time zone and language of use;

- Network data, as the IP address and the operator[166].

What is not collected by the application includes:

- MAC addresses, Wi-Fi networks SSIDs or SIM serial numbers;

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[162] TikTok Blog (2020). How TikTok recommends videos #ForYou.
[163] TikTok Privacy Center (2024). Privacy Policy U.S.
[164] TikTok Privacy Center (2023). Privacy Policy EEA, UK and Switzerland.
[165] TikTok Privacy Center (2024). Privacy Policy Other Regions.
[166] TikTok Web Site. Privacy Center.

- Facial recognition, fingerprint or other information related to your biometric characteristics;
- SMS or e-mail[167].

Data storage:

Following the major accusations made to TikTok about data security, the Chinese app has also dedicated posts and policies about the data archive. Specifically, about the protection of personal information and its storage. To ensure the security of the platform, the official website has made statements regarding data access. Access to TikTok's personal information is subject to strict security controls, such as: authorization approval protocols and implementation of localized storage mechanisms. In addition, data is protected by robust physical and logical security systems such as controlled access, intrusion detection and firewalls. TikTok also wishes to point out that the information collected, as described above, is stored on servers located in the United States, Singapore and Malaysia. According to the official website, the aim is to significantly reduce the people and devices that can have access to user information by allowing it only to employees who must do their work, "like debugging, troubleshooting, or performance monitoring"[168]. They too, regardless of their role, must be subject to strict security controls and cyber-protection processes such as cryptography. As regards the access to US user data, this is managed by a specialized team called TikTok US Data Security (USDS) and additional security controls, "including an independent board to which USDS leaders and employees will report, create an oversight structure designed to prevent unauthorized access to U.S. user data or systems"[169].

The data storage approach should be local, in order to remain consistent with each country's interests and concerns. It is important to separate US users[170], from those of the European Economic Area and the United Kingdom[171] and from those of other regions[172]. As for the former, according to Project Texas, the data is stored in the US company Oracle Cloud Infrastructure (OCI)[173], whose access is managed by USDS. In particular, Project Texas was born as an initiative to make US users feel safe and to have the guarantee that the platform

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[167] TikTok Web Site. Privacy Center.
[168] NewsRoom TikTok. TikTok Facts: How we secure personal information and store data.
[169] NewsRoom TikTok. TikTok Facts: How we secure personal information and store data.
[170] NewsRoom TikTok. Data Storage for U.S. Users.
[171] NewsRoom TikTok. Data Storage for U.K. and European Economic Area (EEA) users.
[172] TikTok Privacy Center (2024). Privacy Policy Other Regions.
[173] Oracle Cloud Infrastructure Web Site.

can be free from external influences[174]. For second users, Project Clover has recently been introduced, based on local data retention, minimising data flows outside of Europe and limiting access to data by employees. To better align data governance with European digital sovereignty, therefore, they stopped storing data in the US, Malaysia and Singapore and were routed to Dublin and then Norway[175], of which a third-party company will monitor access to data, such as the model used by USDS. Finally, for all users in other geographical regions, there is no local storage: data can be addressed to the US, Ireland, Malaysia or Singapore.

Data sharing:

Following strong concerns from countries around the world about TikTok sharing user data, the app has released a How We Share Your Information section in the aforementioned Privacy Policy. However, the TikTok team has drafted three different Privacy Policies depending on the geographical area referred to (U.S. [176], Europe[177] and other regions[178]). TikTok is equally committed to ensuring that personal information is not sold to third parties outside of the law. However, the company talk about sharing data with business partners, service providers, advertisers and legal reasons.

2.2.3 TikTok's Economic Models

TikTok gets the biggest revenue through two business models: advertising and transaction fees. The first model is based on advertising activity and TikTok has implemented six services to support its advertisers:

- Brand takeovers: namely, the playback of short advertising videos at the beginning of the feed;

- In-feed video ads: these ads can be found among the videos recommended in the feed, but marked by an icon that marks them as adv;

- Banner ads: images at the top of TikTok's page;

- Search ads: advertisements that appear as a result of a search made by the user;

- Branded hashtag challenge: brands can create challenges and games with hashtags and invite users to participate with their content by adding the hashtag;

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[174] TikTok USDS. TikTok's Commitment to U.S. National Security.
[175] NewsRoom TikTok (2024). Progress update on Project Clover.
[176] TikTok Privacy Center (2024). Privacy Policy U.S.
[177] TikTok Privacy Center (2023). Privacy Policy EEA, UK and Switzerland.
[178] TikTok Privacy Center (2024). Privacy Policy Other Regions.

- Influencer marketing: advertisers use influential creators to publish the service or product.[179]

The second business model is based on transaction fee, mainly through two ways:

- Gift commission: namely, the fee that the app applies to virtual gifts, converted into virtual coins, which creators receive from users during live;
- Live-streaming commerce service fee: Live is paid when creators use it to sell their product, as if TikTok acts as a "showcase". [180]

2.3 Security Concerns

The previous sub-chapter aimed to create a knowledge base essential for the understanding and development of dynamics that the thesis will deepen over the course of the pages. It is crucial to highlight the thin difference between what is officially declared by the social colossus and what is perceived instead by other realities, such as scholars and foreign governments. Although the information in the previous paragraph is derived from official TikTok sources, as well as academic articles and research, and although the social platform has quickly moved to take numerous measures to ensure greater transparency in its processes and reassure countries about the security of users' data, international debate and doubts have not stopped. Since the international launch of TikTok in 2018, two concerns have emerged more clearly in public discourse. The first concerns the extensive user data collection policy, which has raised strong concerns about the protection of sensitive data. In particular, the handling of data by TikTok has created deep uncertainty about its storage and sharing, assuming that this data can be used for more serious reasons than economic ones, such as manipulation and espionage. The second major suspicion is, however, linked to an intrinsic aspect of data management. That is, the idea that TikTok can be used as a political tool by the Chinese government[181], exercising a form of soft power and manipulating the content that is recommended to users around the world. Although this assumption has been repeatedly refuted, countries are not inclined to drop the hypothesis that TikTok is actually a means of influencing public opinion, especially in countries where the app is very popular. Although this thesis does not aim to prove whether the allegations against TikTok are founded or not, it is essential to provide an overview of what the security context is within which these international concerns fit. Analysing the regulatory and policy framework TikTok must navigate and examining the nature

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[179] Wu., J. (2021). Study of a Video-sharing Platform: The Global Rise of TikTok. Massachusetts Institute of Technology.
[180] Wu., J. (2021). Study of a Video-sharing Platform: The Global Rise of TikTok. Massachusetts Institute of Technology.
[181] Scatton, S. (2023). TikTok Risk or Threat? Competing narratives about risks and threats in the US case. Umeå University.

of restrictions and limitations imposed by governments is essential to fully understand the complex context of regulatory pressures surrounding the future of the app. Knowledge of this context helps us to focus more on the technological role, but above all on the geopolitical role, that was given to TikTok in the direct influence of international relations and the complex challenge of maintaining a digital sovereignty balance between nations.

To achieve this ambitious goal, it is essential to divide the sub-chapter into three sections, each of which delves deeper into a key aspect of the security debate. First, the thesis starts by analysing what are the risks related to aggressive data collection and what are the statements and any measures taken by TikTok. Secondly, the text also touches on the delicate controversy that follows the collection of data, namely how and how much the Chinese government could exercise its legal power over the company ByteDance. Last but not least, is the fear that comes from a possible manipulation of the Chinese government on the content recommended to users, through the management of a mysterious algorithm that is exclusively in the hands of the parent company in China.

2.3.1 Risks About Data Collection

Despite the transparency with which TikTok has stated what information, and how, employees have access to and collect data, several organizations and researchers have reported excessive and invasive data collection by the app. A case in point is the cybersecurity research published in July 2022 by researchers from Internet 2.0, an Australian-based company that deals with cybersecurity. The report shows how the Chinese app collects wide-ranging information, such as the user's geolocation, calendar, contacts, device information used and a list of other installed applications. A data collection modality that highlights a disturbing concern about the use made of it[182]. The Indian Ministry of Electronics and Information Technology itself blocked 59 apps from China in 2020, TikTok included, on suspicion of "stealing and surreptitiously transmitting users' data in an unauthorised manner to servers which have locations outside India"[183]. But the scientific community is not unanimous: there are entities that minimize the accusations, arguing that the data collection practices by the app are not so different from many other social platforms such as Facebook, Google or Twitter. There are many realities to confirm this. One example is the Washington Post, which in 2020 collaborated with a cybersecurity company to release the results of a survey that shows how

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[182] Perkins & Robinson (2022). TikTok. Internet 2.0.
[183] BBC (2020). India bans PUBG, Baidu and more than 100 apps linked to China.

TikTok collects amounts of data similar to other social platforms[184]. Similarly, the interdisciplinary Citizen Lab has also found that TikTok would not collect more data than is already being collected by other major social networks, confirming that its data collection practices are not an anomaly in the privacy technology landscape[185]. TikTok continues to state that despite the doubts about data collection security, the Chinese app does not collect more data than other apps on the market[186], like for example Facebook and Google tracking user activity across devices, while TikTok denies doing so[187]. The concerns related to data mining are related to the deeper fear about the uncertainty surrounding the use that is made of all this data and the purpose that this information will have in the future. This sense of undefined uncertainty creates a feeling of threat that further fuels the mistrust governments have towards TikTok.

2.3.2   Risks About Chinese Government Influence

The main concern is not so much the amount of data collected, but rather the use that is made of it. One key concept to explain this feeling is the undefined threat. In an article on CNN, it is assumed that such data mining is used for the purpose of providing data to Chinese intelligence about the identification of personal weaknesses and recruitment of spies. Although the users of TikTok are mostly teenagers, this does not detract from the fact that they will be the ruling class in the future and their inclinations are to keep under analysis in view of the coming times[188]. The BBC has also reached similar conclusions, claiming that data collected by TikTok could be exploited for illicit purposes such as extortion and espionage, through tracking users' sensitive information[189]. Also, the Times journalist, Sapna Maheshwari, declared in an interview that the Chinese app could collect sensitive data for the precise purpose of monitoring and blackmailing US citizens[190]. The CSIS vice president, James Lewis, also supports the thesis of Chinese intelligence espionage. He said that international espionage is changing, as the rest of the world is changing, and increasingly aims to exploit the digital world to gather more and more information to gain a deeper

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[184] Fowler, G. A. (2020). Is it time to delete TikTok? A guide to the rumors and the real privacy risks. The Washington Post.

[185] Pellaeon, L. (2021). TikTok vs Douyin: A Security and Privacy Analysis. Citizen Lab Research Report No. 137, University of Toronto.

[186] Fung, B. (2023). TikTok Collects a Lot of Data. But That's Not the Main Reason Officials Say It's a Security Risk. CNN.com.

[187] McMillan et al. (2020). TikTok User Data: What Does the App Collect and Why Are U.S. Authorities Concerned?, WSJ.

[188] Fung, B. (2023). Lawmakers say TikTok is a national security threat, but evidence remains unclear. CNN.

[189] BBC (2019). TikTok sent US user data to China lawsuit claims.

[190] Tavernise, S. (2023). How TikTok Became a Matter of National Security. The Daily, The New York Times.

understanding of society. It is undeniable that if you know about certain sensitive data, you can design more effective campaigns of influence and manipulate public opinion where it has weaknesses or nerves exposed.

Actually, all these fears have a well-founded basis, which lies in the Chinese cybersecurity law. In fact, although TikTok does not directly collaborate with the Chinese government, nor is it under its supervision, it is conceivable that the party operates a certain influence on all companies operating under the jurisdiction of the People's Republic of China (PRC). As noted above, although TikTok is a globally launched app, ByteDance actually has Chinese roots and its company still operates from its headquarters in Beijing, the capital of China. So, being the parent company of Chinese origin, it may be required to cooperate with the Chinese government on maintaining national security and this could include transferring data from TikTok users. The hypothesis is born from a specific law of the country: the Cybersecurity Law of the People's Republic of China. This legislation, passed in November 2016, entered into force in mid-2017, updated in November 2018 and again in September 2022 by the Regulations on Internet Security Supervision and Inspection by Public Security Organs, clearly defines an intrinsic collaboration between the government and Chinese companies. In particular, through Article 7, it establishes that Chinese companies and citizens must cooperate with the Chinese government by supporting, assisting and cooperating[191]. The law specifically requires:

- An effective control of online activities;
- Local recording of user data;
- Government controls and inspections on computer networks.[192]

This is why concerns have been raised in favour of the hypothesis that there may be a regulatory framework for an immense collection of data to serve Chinese intelligence. In 2020, shortly after the Indian government's position statement against TikTok, former US President Donald Trump also expressed concerns about the app's data collection, which "allows the Chinese Communist party access to Americans' personal and proprietary information"[193].

However, there is still no concrete evidence that TikTok surely transmits the information to the government. As mentioned above, the threat is only potential and not defined, since there is no certainty or evidence that such illegal activities have occurred. Since the first

[191] Scatton, S. (2023). TikTok Risk or Threat? Competing narratives about risks and threats in the US case. Umeå University.
[192] Congressional Research Service (2023). TikTok: Technology Overview and Issues.
[193] The White House (2020). Executive order on addressing the threat posed by TikTok. Press release.

charges, TikTok executives have pledged to reassure the public of their transparency and non-collaboration with the PRC, stating that employees do not have access to user data outside of China[194]. To confirm this, the CEO Shou Zi Chew, claimed that the Chinese government never made any requests about TikTok users' data, pointing out that if it did, the company would have refused the request[195]. In addition, for users in the US and European area, data is collected locally and not stored on servers in China. Yet, with the introduction in September 2021 of China's New Data Security Law of the PRC, new fears have emerged. In fact, the latter states that data will be managed in a manner consistent with the state's fundamental security principles and objectives[196]. This means that the data collected will not only be managed in accordance with the party, but also in application to activities carried out outside the Chinese territory, whether they consider potentially damaging to the security and public interest of the country, the definition of what these activities may be threatening to China's public interest and the wide discretion left to the Chinese authorities raises serious doubts in the international community.

2.3.3 Risks About the #ForYou Feed

A final concern that has been highlighted is the fact that the Chinese government may influence TikTok users through recommendations provided by TikTok's powerful algorithm. As described above, TikTok's innovative algorithm has the ability to recommend an endless stream of videos and content to the user based on their interests. However, if we add this information, with the assumption that the Chinese government would have access to sensitive data and consequently to users' weaknesses, then it would be able to influence the content that is recommended in the main feed. This fear is actually born from TikTok's Chinese twin, Douyin, who would be subject to strong censorship and strict patriotic promotion campaigns[197] and educational content[198]. The fear that this logic may be applied to the international version is real. However, recent studies by the Citizen Lab have shown that "the platform does not enforce obvious post censorship"[199]. In fact, if somebody looks for China-sensitive content on TikTok, such as the situation between China and Taiwan or memes about current president Xi Jinping, they are not censored. The confirmation also comes from the

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[194] TikTok NewsRoom (2020). Statement on the Administration's Executive Order.
[195] Fung, B. (2023). Lawmakers say TikTok is a national security threat, but evidence remains unclear. CNN.
[196] DigiChina (2021). Translation: Data Security Law of the People's Republic of China. Standford University.
[197] Zhang, Z. (2020). Infrastructuralization of Tik Tok: Transformation, Power Relationships, and Platformization of Video Entertainment in China.
[198] Tidy, J. (2024). Is TikTok really a danger to the West? BBC.
[199] Pellaeon, L. (2021). TikTok vs Douyin: A Security and Privacy Analysis.

Georgia Institute of Technology[200], according to which these contents are not only not censored, but are also very viral in the app. It would therefore appear that, at the moment, there is no concrete evidence to confirm that the Chinese government is manipulating or spying on TikTok users. Nowadays, the only concerns related to the app are of a theoretical nature, but the deepest motivation from the world outside of China can be explained through the words of the cyber security expert at the Center for Strategic and International Studies, James Lewis: "It's not that we know TikTok has done something, it's that distrust of China and awareness of Chinese espionage has increased (…) The context for TikTok is much worse as trust in China vanishes"[201]. The most concrete hypothesis, compared to what is happening in the world, is that probably the bans imposed on TikTok are mostly symbolic[202] and that a strong anti-Cina rhetoric is spreading like wildfire around the world as it grows in its advancement as a world power.

Conclusion of Chapter 2

Considering the analysis presented during the second chapter, TikTok has undoubtedly been one of the most innovative apps of recent years and, at the same time, one of the greatest geopolitical threats of our day. It is paradoxical to think of a simple entertainment social platform as an international security threat. Yet, in a reality like today's where the digital world intersects, overlaps and sometimes replaces the real one, it would be absurd not to admit that even a "simple" app like TikTok can't play a fundamental role in the world balance. Unlike other social platforms, the thesis shows how TikTok has distinguished itself by its progressive ability to attract billions of users, through a unique algorithm that made the platform an extremely personalized and immersive space. However, precisely because of this extreme popularity by a non-American app, it has raised strong doubts about its real nature. On one hand, TikTok is an unprecedented advertising reality for creators and brands, on the other hand it has also raised many controversies on issues related to data collection and hypothetical political influences by the Chinese government.

The chapter started right here. Before investigating the geopolitical role of the current bans imposed on TikTok, it is important to analyse what TikTok is and how it works. In particular, during the course of the first chapter, the aim was to lay a foundation for understanding those which are the two main strands of concern that regarding the app: the first concern is about the collection and storage of data from users around the world outside of China, and the second deal with the influence that the Chinese

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[200] Mueller & Farhat, (2023). TikTok and US national security. Georgia Institute of Technology, School of Public Policy, Internet Governance Project.
[201] Schwartz & Lewis (2023). TikTok- Is it Chinese Espionage?, The Truth of the Matter. CSIS.
[202] Linebaugh & Knutson (2023). What's Up With All the TikTok Bans? The Journal, The Wall Street Journal.

government could exploit on the app through the country's domestic laws. Particular attention has been paid to statements made by TikTok executives, who have publicly confirmed their methods of collecting, storing and sharing data. Although the statements state that users' data from around the world is highly protected, not shared with the Chinese government and subject to local storage practices on servers located outside of China's jurisdiction, many governments, including first India and then the US in 2020, have expressed concern about the use of data for surveillance or espionage purposes. The fears of governments around the world have found a root in China's own cybersecurity legislation, namely the 2016 Cybersecurity Law and the 2021 Data Security Law. These would implicitly require mutual cooperation between Chinese companies and citizens with the government to safeguard national security. Data protection risks are interpreted by foreign governments as a way for the PRC to appropriate TikTok as a tool for controlling and influencing world public opinion. However, TikTok, strong of its success and not likely to have to leave the global market, has made important compromises with governments. The initiatives with the US and Europe are examples. Following the national ban by the Indian government, TikTok has decided that it did not want to risk a boycott from other major countries for its trade. For this reason, initiatives such as Project Texas and Project Clover have tried to respond to the app's claims of lack of transparency. Despite the implementation of these and greater control by local servers, not all concerns about direct control over the algorithm, to which countries do not have access, and about ambiguous data management have been dispelled, leading to symbolic bans at TikTok based almost exclusively on the low confidence in the Chinese political authorities. The second reason TikTok is constantly being banned is because of the hypothetical influence that the Chinese government would impose on TikTok and the data available to it. The idea that TikTok can be used as a tool for Chinese propaganda lies in the restrictions that have been imposed on Douyin by the Chinese government itself. The strict controls and promotion of patriotic content on the Chinese app have raised concerns from the international community that restrictions may also be applied on the international app. However, independent Western studies show, or rather do not show, any concrete evidence that there is a real censorship or manipulation in favour of the PRC. Despite this, controversy still rages because of a powerful algorithm that remains in the hands of TikTok executives.

The conclusion of this chapter therefore leads to the admission that the concerns surrounding the TikTok case are purely theoretical in nature and, consequently, reflect a climate of extreme mistrust towards the Asian power. The platform has been lucky enough to grow in a prosperous period for China and artificial intelligence, leading to great success worldwide, but at the same time it has had to navigate in a very complex geopolitical and economic context, where digital sovereignty and data protection have become the most relevant topics for countries around the world. In this geopolitical

context, TikTok is a case study of how an app can simultaneously represent an innovative and stimulating technological push and an international geopolitical threat. To sum up the chapter, TikTok is not only a popular short video sharing application but also and above all the emblem of the new challenges that the digital and interconnected world must face. The ability of TikTok to address geopolitical pressures and its willingness to adapt to new regulatory demands from governments will not only determine the future of the app, but will mark the role that Chinese apps will play in the global scenario until now governed by predominantly US media. The question to ask is: will TikTok be able to reconcile its affiliation with the Chinese government and the preservation of trust from countries around the world, or will it succumb to the demands for international security policies?

CHAPTER 3: THE INDIAN CASE STUDY: INSIDE THE BAN

The third chapter is the central core of the thesis, the passage where all the points previously examined are connected and concretised in an in-depth analysis of the Indian case. The first two chapters have laid the foundations for understanding the context in which the ban has been placed, namely the culmination of digital sovereignty, and the main subject of study, TikTok, exploring how digital platforms can become powerful geopolitical tools in the digital age. In this chapter it is now essential to develop the starting concepts and apply them to the specific case of the 2020 Indian ban, demonstrating how this event represents an emblematic example of the meeting between geopolitics and digital.

Specifically, the third chapter describes the ban of TikTok by the Indian government following a historic and violent battle on the Himalayan border between Indian and Chinese troops, which represented the culmination of an ancient rivalry between the two Asian giants, today accentuated by the digital sphere. This long-standing antagonism is due to several factors, including territorial disputes, incompatible alliances and conflicting views. Tensions have also increased following the exile of the Dalai Lama in India, which has only complicated the relationship between the two[203]. Despite this, India has actually made progress towards the neighbour, also recognizing China's sovereignty in Tibet in 1954 on the basis of the "Five Principles of Peaceful Co-existence" (mutual respect, non-aggression, non-interference, equality and peaceful coexistence)[204], but in practice tensions have never subsided. On the contrary, they have intensified in recent decades. However, despite the "China question"[205], Indian leaders such as Prime Minister Narendra Modi have tried to rewrite the history of their intricate bilateral relations, giving a more personal approach to foreign policy. This innovative approach has been reflected in numerous meetings between the Indian Prime Minister and the Chinese President Xi Jinping, which despite being interpreted as an "unusual departure"[206], sent out positive signals of a new start in friendly collaboration.

However, this apparent phase of conciliation was short-lived, as in June 2020 the Indian and Chinese troops clashed in a violent struggle in the mountainous border area in the Ladakh region, the Galwan Valley, causing the death of 20 Indian soldiers, an uncertain number of Chinese victims and unrecoverable geopolitical consequences. This clash may have highlighted what already existed, namely a climate of mutual mistrust and deep differences that have always separated the two Asian

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[203] Gokhale, V. (2024). The Next Dalai Lama: Preparing for Reincarnation and Why It Matters to India. Carnegie India.
[204] External Publicity Division (2004). Panchsheel. Ministry Of External Affairs Government of India.
[205] Kumar, A., & Thussu, D. (2023). Media, digital sovereignty and geopolitics: The case of the TikTok ban in India, Media, Culture & Society.
[206] Blanchard, B. (2015) Optics as well as substance important as India's Modi visits China. Reuters.

countries. Following the timeline of the dynamic, the Indian government has not waited for the answer that it had perhaps been waiting for a while, namely banning 58 apps of Chinese origin and TikTok. An impressive measure, considering that India was one of the largest markets in the world for the platform, with over 200 million users[207]. Aggravated by the Galwan clash, the Indian government justified the decision by claiming that TikTok represented a threat to national sovereignty and integrity[208], but actually it wasn't the first time they tried to ban the app. In fact, already in 2019 there was a petition against the platform claiming that it disseminated inappropriate material[209], then strongly opposed by the same representatives of TikTok who declared to act in accordance with the Indian regulatory framework[210]. Not only was this ban lifted, but it did not receive any special attention from the media[211].

What has changed with the second ban in 2020? At that time, the action by the government sparked an intense debate in the national media, marking a fundamental turning point for Indian public storytelling[212]. The analysis of the ban is therefore crucial in the thesis, since it not only highlights the growing attention to digital sovereignty in the contemporary world, but also makes it clear how geopolitical dynamics can influence the global technological landscape, and vice versa. Plus, this insight provides the basis for understanding today's developments and debates involving TikTok worldwide. To get a deeper insight into the subject, it will be necessary to analyse in detail the origins of the ban, the real reasons behind the measure, the reasons for its popularity and, finally, the implications that it had not only in India but also internationally. To touch all the points relevant for analysis, the thesis has to begin from the historical event that started the infinite digital clash between India and China. The historical analysis of bilateral relations between the two countries is used as a starting point, with a focus on the geopolitical tensions that have characterized them and the main historical events they faced to reach the climax embodied by the violent Galwan valley clash in June 2020. From the clash in Ladakh, we then move on to the second section that examines in detail the reasons behind the Indian government's response, namely the ban of 59 apps of Chinese origin, including TikTok. The objective is to understand both the official reasons behind the decision related to national security and the renewed need for digital sovereignty, as well as the more complex and

[207] Kumar, A., & Thussu, D. (2023). Media, digital sovereignty and geopolitics: The case of the TikTok ban in India, Media, Culture & Society.
[208] Press Information Bureau, Government of India (2020). Government Bans 59 mobile apps which are prejudicial to sovereignty and integrity of India, defence of India, security of state and public order.
[209] Kumar, A., & Thussu, D. (2023). Media, digital sovereignty and geopolitics: The case of the TikTok ban in India, Media, Culture & Society.
[210] TikTok (2019) TikTok reinforces its commitment towards creating a better user experience in India.
[211] Kumar, A., & Thussu, D. (2023). Media, digital sovereignty and geopolitics: The case of the TikTok ban in India, Media, Culture & Society.
[212] Mehta S (2020) Television's role in Indian new screen ecology. Media Culture & Society.

intrinsic geopolitical motivations. In the third point, the focus is on analysing the role of media storytelling in shaping the public's sentiment towards ban, promoting the government agenda. We will see in detail the construction of the image of a strong and united India facing the "Chinese enemy". Finally, in the fourth and last part we will go beyond the mere media representation, too little objective, and we will assess the real effects of the ban TikTok on the territory, market and Indian society. We will start with the economic and digital implications, then touch on the geopolitical ones, to conclude with an analysis of what has become the post-TikTok digital ecosystem.

3.1 The Road to the TikTok Ban: Sino-Indian Historical Context

On 15 June 2020, the point of no return for bilateral relations between India and China was defined by the brutal clash in the Galwan valley along the Line of Actual Control (LAC)[213]. Like any story between countries, this was not an isolated event but the culmination of an escalation of tensions over disputed territorial borders. For many experts, this event marked an irreversible turning point in Sino-Indian diplomatic relations, compromising the foundations that have been built with difficulty over the last decades. However, to fully understand the clash in the Galwan valley and the ensuing response of India to ban TikTok, it is useful, if not essential, to look at the broader historical context of their relationship, marked by geopolitical rivalries and conflicting aspirations. To find the cause of the deterioration in their relations, it is necessary to examine what have been the steps in the years that led to their misalignment and mutual mistrust. As we will see in this sub-chapter, there have been several occasions on which India has perceived China's actions as assertive and a threat to its strategic interests. On the other hand, the Rising Nation perceives India's close collaboration with the West, particularly with the US, as a strategy to contain its influence in the region and the world. The episode in question is useful to navigate because it reveals the fragility of a relationship now consumed by misunderstandings and mistrust, but also raises doubts about the nature and sustainability of the coexistence of these two powers, highlighting the growing risk of strategic competition that has actually led to the creation of new conflicts. To analyse the historical path of their relations until reaching the pivotal moment means actually to explore the complicated interweaving of geopolitical dynamics that characterize India and China in the current global scenario.

To trace a linear and logical path that led to the Indian case of our interest, the following sub-chapter will be divided into three distinct sections. First, we will explore the historical roots of Sino-Indian rivalry from the 1960s, the crisis of borders, to the conflicting aspirations that have

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[213] BBC (2022). India-China dispute: The border row explained in 400 words.

characterized future relations. Second, the thesis will examine the dynamics between the two countries in the nineties and 2000s, focusing on China's growing economic expansion, militarization along the LAC and the change of foreign policies of the two countries. Thirdly, it will be crucial to highlight how these years of fluctuating distension and misalignment culminated in the Galwan clash, examining its context and the important geopolitical implications that followed the battle.

3.1.1 The Roots of Historical Rivalry

To understand the complex nature of historical Sino-Indian relations, we need to take a few steps back, precisely in 1962, when the Sino-Indian conflict represented one of the most critical moments for bilateral relations between India and China. The origins of the conflict actually date back to a historical factor, namely the ambiguity of the borders inherited from the British colony and their respective geopolitical aspirations. In particular, the LAC, "the demarcation that separates Indian-controlled territory from Chinese-controlled territory"[214], became the heart of the dispute despite it was never officially defined. The major factors of confrontation on the LAC were mainly concentrated in two areas: the Aksai Chin, which China considered as the bridge between Tibet and Xinjiang, and Arunchal Pradesh, claimed by the Indian government as part of its territory[215]. However, with the victory of China and its subsequent occupation of the Aksai Chin the conflict became even more unstable and caused a humiliation for India that triggered a deep mistrust that would strongly characterize the future foreign policies of both countries.

Yet, things changed when in 1988 the official visit of the former Indian Prime Minister, Rajiv Gandhi, to China represented the beginning of a new phase of rapprochement in the bilateral policy of the two countries[216]. On that occasion, both India and China agreed on three common objectives among their countries, namely: the normalization of their relations based on the Five Principles of Peaceful Co-existence, the mutual commitment to maintain peace along the LAC and, finally, the mutual recognition of each country's contribution to world peace and progress[217]. This "Rajiv Gandhi–Deng Xiaoping modus vivendi"[218] was to be a turning point for Sino-Indian relations. However, the problems were still present because in

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[214] Singh, S. (2020). Line of Actual Control (LAC): Where it is located, and where India and China differ. Indian Express

[215] Pathak, S. & Hazarika, O. B. (2022). Reasons and Reactions to the Galwan Clash: An Indian Perspective. The Journal of Territorial and Maritime Studies.

[216] Gokhale, V. (2021). The Road from Galwan: The Future of India-China Relations. Carnegie India.

[217] Ministry of Foreign Affairs the People's Republic of China. Indian Prime Minister Rajiv Gandhi visited China.

[218] Gokhale, V. (2021). The Road from Galwan: The Future of India-China Relations. Carnegie India.

the second half of the decade new elements complicated the delicate situation. Among these, on the part of India, the proclamation of the Arunchal Pradesh as an Indian state in 1987 created new tensions with the Chinese state[219]. On the Chinese side, the renewed relations with the West and the new Sino-Soviet alliance with Mikhail Gorbachev awakened an Indian feeling of reviewing relations with his Asian neighbour[220]. However, at that time, a sign of change was perceived by the Indian government through a stable and confident behaviour on the part of the Chinese leaders led by Deng Xiaoping, former chief of the People's Republic of China from 1978 to 1992. Deng, in fact, had always had the reputation of being recognized as a figure of renewal and openness towards Indian politicians[221]. This new relationship had fuelled hope in India's policy towards a new alliance with China, based on mutual respect, greater collaboration for Indian territorial integration and moderate management of the China-Pakistan partnership. To achieve these goals, Gokhale (2021) explains that India committed itself to a series of initiatives that we could summarize in a commercial reopening, political dialogue and a regained confidence in the global scenario. And indeed, in the early years these measures achieved some of the expected results, including recognition and border agreements, reduced Chinese support for insurgency groups and increased trade between the two countries. Despite these fundamental points of agreement, China remained stuck on some border issues, continuing to build infrastructure on the border and in Tibet, continuing to arm Pakistan and maintaining an ambiguous position on some territories[222]. Also, a special mention to the creation of the China-Pakistan Economic Corridor (CPEC)[223], BRI's key part.

Despite some divergent perspectives, the two countries actually recognized the importance of a strategic alliance with each other. Yet, mutual trust was still very weak during the 1990s, fuelled by the discontent that came from both sides. Indeed, while China hoped that the recent compromises would lead to territorial concessions from India, the Indian government was increasingly wary of Chinese economic expansion and its alliance with Pakistan[224]. It can be seen in this lack of confidence, together with a strong economic and military gap between the two Asian giants, that an international balance through the so-called "modus vivendi" was difficult to maintain, although they both realized the strategic importance of being allies. In summary, while some steps have been taken to normalize

[219] Gokhale, V. (2021). The Road from Galwan: The Future of India-China Relations. Carnegie India.
[220] Gokhale, V. (2021). The Road from Galwan: The Future of India-China Relations. Carnegie India.
[221] Gokhale, V. (2021). The Road from Galwan: The Future of India-China Relations. Carnegie India.
[222] Gokhale, V. (2021). The Road from Galwan: The Future of India-China Relations. Carnegie India.
[223] Ministry of Planning, Development, & Special Initiatives (n.d.). About CPEC.
[224] Gokhale, V. (2021). The Road from Galwan: The Future of India-China Relations. Carnegie India.

relations between the two, the deep roots of the conflict and a lack of compromise on managing borders have laid the foundations for future disagreements.

3.1.2 Divergent Policies and New Tensions of the 21ˢᵗ Century

While the India and China of the 1980s and 1990s seemed to represent a phase of bilateral rapprochement and stability, the shadow of an unresolved conflict continued to loom in the new century. It is undeniable that the nineties were a period of profound transformation for the two Asian countries. From the Cold War to new dynamics of power, for China and India the nineties represented the rapid economic growth that led both states to increase their presence in the global scenario at the dawn of the 21ˢᵗ century. This economic growth was reflected in changes to the foreign policies of both countries, which had to face emerging challenges but also meet new ambitions. This process has accentuated the conflicting interests and different perspectives.

Let's go in order. The ever-growing Chinese economy has marked a turning point in the state's foreign policy, as it began to question for the first time the political strategy of Deng Xiaoping of the so-called Tao Guang Yang Hui, or "keeping a low profile"[225] and wait for the right moment to emerge. Yet, the strengthening of the Chinese economic sector and the 2008 crisis for the West has opened a window of opportunity for the Red Dragon and created new needs for positioning in the global scenario, including greater involvement in foreign affairs between world powers. Considered too anachronistic, Deng's strategy was replaced only after 2013, under the guidance of new Chinese president Xi Jinping, with the innovative principle of Fen Fa You Wei, which means "striving for achievement"[226] and thus more closely reflected the new ambitions of growing China. The new foreign policy approach aimed to strengthen and consolidate the country's leadership in the Asian region, supporting relations with neighbouring countries and building on the pursuit of common interests rather than mere mutual trust. Thanks to the new orientation that Xi wanted to give to China, in those years the country enjoyed a favourable strategic environment within the region. However, the presence of US initiatives in neighbouring countries and the Western alliance with India have reinforced Beijing's idea that there was a real attempt to contain its rise on the world stage[227]. This fear

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[225] Xuetong, Y. (2014). From Keeping a Low Profile to Striving for Achievement. Chinese Journal of International Politics.

[226] Xuetong, Y. (2014). From Keeping a Low Profile to Striving for Achievement. Chinese Journal of International Politics.

[227] Yan X. & Qi H. (2012). Football Game Rather Than Boxing Match: China–US Intensifying Rivalry Does Not Amount to Cold War. Chinese Journal of International Politics.

of a strategic threat has led China to adopt a regional approach that is assertive, though primarily defensive[228], considering the role of India merely secondary. The marginal role tied to his neighbour has contributed not only to a dissonance of mutual perceptions, but also to a departure from common interests. The country has also adopted a strategy called "salami slicing"[229], that it was gradually consolidating its control over the territory through infrastructure along the border, posing a subtle but clear threat to India's digital sovereignty and status quo.

India, for its part, began to revise its foreign policy in the 1990s, adopting more modest but progressive adjustments rather than implementing a completely different strategy. In this new policy we see mainly two pillars of renewal, namely the end of the policy of non-alignment and an increasingly evident rapprochement with the United States at the end of the nineties. Indeed, with the end of the Cold War, equidistance politics has lost relevance, prompting the Indian government to seek more collaborative and supportive relations with other countries. Over the years, in fact, the Indian leadership has made progress towards global openness and progress in the face of Chinese assertiveness, opting for a "doctrine of multialignment"[230]. This approach has seen India forge strong ties not only with the US but also with regional partners, such as the Quadrilateral Security Dialogue (QUAD) which, in addition to India, includes the US, Japan and Australia[231]. At the same time, India has intensified its relations with neighbouring countries in order not only to counter Chinese influence but also to consolidate its role on the international stage.

The profound asymmetry between the two countries was already clear. On the one hand, China, an emerging country and a key figure in global governance, on the other hand, India, a minor actor but strong strategic alliances. Growing Chinese influence in the region, coupled with continued activism on the LAC, has led to India feeling threatened and forced to reject key Chinese demands, intensifying relations with the US and putting at risk an already precarious situation with Beijing, which it perceived as hostile moves. These differences have thus created a fertile ground for misunderstandings and growing tensions, which will soon lead to strategic rivalry between the two.

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[228] Chen, D. & Pu, X. (2013). Debating China's Assertiveness. International Security.
[229] Pathak, S. & Hazarika, O. B. (2022). Reasons and Reactions to the Galwan Clash: An Indian Perspective. The Journal of Territorial and Maritime Studies.
[230] Gokhale, V. (2021). The Road from Galwan: The Future of India-China Relations. Carnegie India.
[231] Australian Government, Department of Foreign Affairs and Trade (n.d). Regional Architecture: The QUAD.

3.1.3 The Galwan Valley Clash as a Catalyst

In the years preceding the clash, the two countries have seen not only a radical change in the leadership of the two countries, but also a change in foreign policies and new geopolitical attitudes. From here on, the border conflict has only intensified due to misunderstandings and divergent ambitions. The most dramatic point for Sino-Indian relations was definitely marked by the summer of 2020, culminating in the violent clash in the Galwan valley that completely broke the already fragile relations between the two Asian neighbours. The event, took place on 15 June 2020[232], was not, however, an isolated incident but the result of a long series of geopolitical, economic and military tensions and subsequent skirmishes on the border over decades. The Galwan clash, in the Ladakh region, has become a symbol of this eternal battle that, after years of fragile and forced balance, exploded without precedent.

In May 2020, there were already the first signs of an imminent crisis. The first clashes occurred along the LAC, where Chinese and Indian troops clashed several times. The growing tension was also exacerbated by the recent construction of the strategic road Darbuk-Shyok-Daulat Beg Oldie (DSDBO)[233] which had provoked an intense Indian logistic and military presence along the disputed border. The road, designed to improve control along the border line, has instilled in the Chinese government an ever-increasing sense of direct threat to its position. So, June 15, was inevitable. The tensions, in fact, culminated in a violent unprecedented clash because fought hand to hand with rudimentary weapons[234]. The brutality of the conflict resulted in the death of 20 Indian soldiers and an unknown number of Chinese victims[235]. This episode not only marked a major violation of the peace agreements on the LAC, but also entailed a definitive rupture and mistrust in bilateral relations between the two countries. The causes of the clash are obviously numerous. Among these, surely the construction of DSDBO, Chinese slicing salami and the global context of the Covid-19 pandemic played a vital role in the dispute. Moreover, China may have seen the dispute as a way to reassert its leadership in the region, due to continued domestic and international pressure. To this, add also factors listed above, such as the growing assertiveness of China and the policy of Indian alignment with the United States and the Quad, increasing the mutual perception of threat to their sovereignty. The clash had a significant impact shortly thereafter. From a political point of view, the event has in fact broken that semblance of mutual trust and

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[232] BBC (2020). Galwan Valley: China accuses India of 'deliberate provocation'.
[233] Pathak, S. & Hazarika, O. B. (2022). Reasons and Reactions to the Galwan Clash: An Indian Perspective. The Journal of Territorial and Maritime Studies.
[234] BBC (2020). Galwan Valley: China accuses India of 'deliberate provocation'.
[235] The Guardian (2020). India says 20 soldiers killed on disputed Himalayan border with China.

discredited the peace agreements signed in the nineties, highlighting the ineffectiveness of the existing diplomatic relations. Moreover, at the national level, the event had a strong impact on the feelings of the Indian population, which fed a strongly anti-Chinese nationalism that persists today[236]. Indeed, the death of Indian soldiers was celebrated as a heroic gesture and sacrifice for the nation, while anti-Chinese sentiment soon turned into a mass boycott of Chinese products and applications[237]. The clash represented a turning point in the relations of the two countries, not only aggravating the situation of mistrust, but also redefining the geopolitical dynamics in the region, leading the two countries to an ever-increasing rivalry. It was in this context that the Indian government seized the opportunity to adopt certain policies against China, such as banning 59 applications of Chinese origin, including TikTok.

3.2 After Galwan: In-Depth Analysis of the TikTok Ban

"The Ministry of Information Technology, invoking it's power under section 69A of the Information Technology Act […] in view of the emergent nature of threats has decided to block 59 apps […] prejudicial to sovereignty and integrity of India, defence of India, security of state and public order" [238]. This is the opening of the ban posted on 29 June 2020 by the government of India in response to one of the most brutal clashes since 1962 in the Galwan Valley.

This second ban is not surprising, as tensions between India and China are becoming increasingly tense and one blames the other for what happened. Just a few days after the clash, the Indian government accused the counterpart of a "pre-meditated action"[239], while China accused them of being guilty of provocations along the LAC[240]. It is in fact taken from the media, including the most popular television station in China CCTV, that "the Indian border guards have backtracked on their promises, seriously violating the agreement between the two countries on border issues"[241]. At the same time, sentiment and protests against Chinese action on the border were growing in India, leading to movements of boycotts of Chinese product[242]. In this context,

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[236] Gupta, R. (2024). Beijing is concerned about anti-China sentiment in India. New Delhi is focused on border. The Print.

[237] Kumar, A., & Thussu, D. (2023). Media, digital sovereignty and geopolitics: The case of the TikTok ban in India, Media, Culture & Society.

[238] Press Information Bureau, Government of India (2020). Government Bans 59 mobile apps which are prejudicial to sovereignty and integrity of India, defence of India, security of state and public order.

[239] Ministry of External Affairs (2020) Phone call between External Affairs Minister, Dr. S. Jaishankar and Foreign Minister of China, H.E. Mr. Wang Yi. Government of India.

[240] Kumar, A., & Thussu, D. (2023). Media, digital sovereignty and geopolitics: The case of the TikTok ban in India, Media, Culture & Society.

[241] Kumar, A., & Thussu, D. (2023). Media, digital sovereignty and geopolitics: The case of the TikTok ban in India, Media, Culture & Society.

[242] Ellis-Petersen H (2020) Indians call for boycott of Chinese goods after fatal border clashes. The Guardian.

Modi's India, known for its understanding of the symbolism and relevance of public sentiment, quickly announced the ban of 59 Chinese apps, including TikTok.

3.2.1 Official Motivations Between Security and Digital Sovereignty

As previously stated, the TikTok ban, published on 29 June 2020 on the official website of the Government of India, was officially justified as a requirement by the Indian government to protect its digital sovereignty and the security of its citizens. This position was based on the existing law in Section 69A of the Information Technology Act 2000, which authorizes the government to ban certain applications and platforms if they are considered prejudicial to the integrity of India[243]. The argument was clearly advanced following the clash in the Galwan valley and, during this time, geopolitical tensions have brought the two countries to a breaking point and fuelled in India a strong political and public pressure aimed at countering the Chinese influence on the territory. The ban of TikTok was perceived as an immediate response to needs.

Security has been a central theme in the rhetoric of the Information Technology Ministry to justify the ban. The Indian government, in fact, "had expressed concern that Chinese-owned apps could provide Beijing with a potent messaging tool within India's raucous media environment"[244] and "stealing and surreptitiously transmitting users' data in an unauthorised manner"[245], fuelling the fear that this information would be located by Chinese servers located outside of Indian territory[246] and used for surveillance purposes or for a hypothetical cyber war, thus describing the measure as an act of "data security and safeguarding the privacy"[247]. As discussed in depth in chapter two, although TikTok, specifically ByteDance, has consistently denied these allegations and stated that it does not share information with the Chinese government, India has maintained a solid position that the platform represents a real threat to the state in the context of growing geopolitical tensions between the two countries. In this sense, the role of government agencies in risk assessment has been essential. Among these, the official website of the Ministry of Electronics & IT appoints the Indian Cyber Crime Coordination Centre and the Computer Emergency Response

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[243] Press Information Bureau, Government of India (2020). Government Bans 59 mobile apps which are prejudicial to sovereignty and integrity of India, defence of India, security of state and public order.
[244] Travelli, A. & Raj, S. (2024). What Happened When India Pulled the Plug on TikTok. The New York Times.
[245] Press Information Bureau, Government of India (2020). Government Bans 59 mobile apps which are prejudicial to sovereignty and integrity of India, defence of India, security of state and public order.
[246] Press Information Bureau, Government of India (2020). Government Bans 59 mobile apps which are prejudicial to sovereignty and integrity of India, defence of India, security of state and public order.
[247] Press Information Bureau, Government of India (2020). Government Bans 59 mobile apps which are prejudicial to sovereignty and integrity of India, defence of India, security of state and public order.

Team (CERT-IN), who have performed important recommendation tasks and collected reports from users about breaches of user privacy and data through the platforms. In addition to the technical side, important concerns were raised also within the Parliament which suggested a broad consensus towards a possible rigid action by the state. Everything, then, suggested a possible Indian action.

In addition, the ban was mainly supported by the growing public consensus that was being established on the importance of protecting digital sovereignty. Looking at the scene from this perspective, the ban was not only a necessary measure for national security but also a strong political act that reaffirmed India's control over its digital territory. As announced on the official website "India has emerged as a leading innovator when it comes to technological advancements and a primary market in the digital space"[248], promoting an idea of India as a model of digital self-sufficiency free from foreign influences. Public narrative has therefore played an important role in the adoption of the measure as a symbol of resistance to digital colonialism, described above.

In conclusion, the official rationale behind TikTok's ban clearly reflects a web of legal reasons, national security concerns and digital sovereignty that have led to a decision that goes beyond the mere banning of a Chinese platform. The decision highlighted the growing importance of regulating cyberspace in response to threats to data collection, transfer and privacy from foreign platforms, underlining the risk that these might compromise India's security and integrity. The strong involvement of government agencies and parliamentary representatives underscored the urgency and support for a tough stance, reaffirming the government's commitment to create a secure digital ecosystem and strengthening public confidence in state sovereignty.

3.2.2 Geopolitical Motivations Beyond Words

The reasons behind the ban are more complex than that. After all these premises, it will be clear to the reader that in addition to the official motivations related to security and digital sovereignty, the TikTok ban fits into a much broader framework, in which the global dynamics of China and India are intertwined with strategic alliances and power struggles. The Indian measure, in fact, was not only an immediate response to the clashes along the LAC, but a genuine symbolic gesture aimed at countering foreign interference, strengthening relations with Western allies and fostering a nationalist narrative within the country.

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[248] Press Information Bureau, Government of India (2020). Government Bans 59 mobile apps which are prejudicial to sovereignty and integrity of India, defence of India, security of state and public order.

From a geopolitical point of view, the Indian government's ban on TikTok was a clear statement of resistance against Chinese territorial, economic and digital expansion. China, in fact, with its ambitious BRI agenda and its close alliances with Southeast Asia increasingly posed a major threat to Indian leadership in the region. Even more so, the digital influence through the presence of Chinese apps on Indian territory supported the hypothesis of a security threat, but above all that these were part of an extension of Chinese soft power[249], allowing Beijing to increase its influence also through digital platforms. The ban on TikTok was thus an emblematic way to limit Chinese digital access to one of the largest and most dynamic IT ecosystems in the global scenario, but it also represented a strong message of sovereignty at the international level.

Another relevant geopolitical aspect has certainly been the strengthening of Indian alliances with anti-Chinese strategic partners, such as the US and the Quad. Strengthened by a moment of high tension between China and the United States over trade disputes and cyber-espionage, India has regained a strong alignment with the West to counterbalance Chinese growth. In fact, the TikTok ban has also promoted an image of India as a loyal and reliable strategic partner for Western countries in Chinese containment, enhancing strategic ties for digital security and Indo-Pacific management.

From a domestic perspective, however, the ban had a strong symbolic significance. Indeed, the Indian government, led by its leader Modi, has pursued a narrative based on a strong India capable of taking decisions independently in defence of its national interests. At a time of strong anti-Chinese sentiment, following the bloody clashes between Indian and Chinese troops, the ban played a central role in galvanising even more popular support for an independent digital nationalism promoted by the Indian leadership.

In conclusion, it is vital to remember that the TikTok ban cannot be fully understood without considering the complex intertwining of official and geopolitical motivations that characterise it. Despite being presented as a measure for the defence of national security and in promotion of digital sovereignty, the ban goes beyond simple legal and technical issues, but rather fits into a framework characterised by regional rivalries, geopolitical tensions and internal political narratives. On the one hand, the ban was a deliberate act to counter Chinese digital influence and improved India's external and internal impression as a strong country; on the other hand, it strengthened India's ties with Western allies and created new opportunities for international collaboration on the strategic level. Long story short, the

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[249] Amighini, A. (2023). Il Soft Power cinese. ISPI.

TikTok ban, before being an emergency measure, is first and foremost a geopolitical action that has redefined many dimensions in the dynamics between India and China.

3.3 Media Narratives and Public Sentiment: A Geopolitical Perspective

The TikTok ban in India was not only a necessary measure for technological regulation, but an important case study that amplified a broad media debate and became a symbol of the contemporary geopolitical conflict between India and China. In fact, this third sub-chapter analyses the crucial role that the media has assumed in promoting a certain narrative to influence public sentiment regarding the perception of the ban. In particular, the Indian media helped to validate the rhetoric that the ban was a necessary element, legitimised by the need to defend digital sovereignty and national integrity. The analysis is fundamental to the thesis as, firstly, provides insight into how the media are active actors capable of shaping public opinion. Secondly, the analysis underlines the close correlation between digital sovereignty and nationalism, highlighting how the technology sector is not a neutral sphere, but rather a strategic arena in which countries fight for political, economic and cultural control. Finally, a focus on the media narrative of the case emphasises the difference between the narrative around the ban and what this measure actually entailed, as we will analyse below.

In order to analyse the narrative construction, the following sub-section will mainly rely on the work of Kumar (2023) and Kumar and Thussu (2023), which highlight the narrative modes used by the media to justify the measure and win the support of the Indian public. According to a Freedom House study, in 2021, 77% of young Indians said they did not trust China because of the clash[250]. A perception largely influenced by the way the events were narrated by the Indian media. In order to understand how it was possible to arrive at such a level of distrust, it first requires an analysis of the narratives promoted by the media. For this reason, the following chapter will be structured as follows. In the first section, it will explore how the media has portrayed China as an enemy to be defeated, comparing it to India as a united nation allied with global partners. In the second, we examine how the media emphasised the idea that the ban was a strategic military action with the aim of amplifying Bharat's urgency and determination. To conclude, the third part shows how the media galvanised popular sentiment of a collective nation, fuelling a sense of national resistance against a common enemy.

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[250] Freedom House (2022). Beijing's Global Media Influence 2022: India.

3.3.1   China, the Enemy Against the World

In the media narrative used within India, symbolism was a very important factor in supporting the TikTok ban. One of these was identifying China as a lone "enemy" against the world. The analysis reveals that although the TikTok ban was apparently a bilateral issue between China and India, in reality, media often emphasised strong international support for the Indian government's decision and suggested a conflict between the world as a whole and China, left alone. In particular, the role of the United States in ideologically supporting its Indian ally and sharing its technological security concerns was highlighted, collaborating in creating a framework of international cooperation against the Chinese government.

An emblematic example of this media narrative emerges from Times of India, which reported US support for the ban through the words of Secretary of State, Mike Pompeo, as "We welcome India's ban on certain mobile apps that serves as an appendage of the CCP's (Chinese Communist Party) surveillance State"[251] and on WION News "The US Secretary of State has also said that India has taken the right decision"[252] statements that suggest strong support from the entire United States ("we") and agree on possible Chinese surveillance actions through the platforms. Moreover, as analysed above, the ban on TikTok is strongly based on India's need to strengthen its digital sovereignty and national identity, which is why the media, such as India Today, also report powerful phrases like "India's clean app approach will boost India's sovereignty. It will also boost India's integrity and national security as the Indian Government itself has stated"[253]. This rhetoric was also supported by Times Now, a popular English-language television channel, which emphasised that India's rigid action was a symbolic and necessary response against Chinese espionage: "Big breaking news, I'm being told that the Indian government has embarked on an unprecedented move, it is decided to punish the betrayal by Beijing"[254].

These narratives demonstrate how the media aimed to legitimise the ban on TikTok, rather than to inform[255], describing it not only as a security issue for the Indian state, but also as a symbolic decision in countering Chinese influence. Moreover, as Kumar (2023) points out, terms such as "espionage" and "conflict" are often repeated to evoke a negative image of the Chinese government and technological misuse. Fairclough (2003) described this media

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[251] Times of India (2020). US Secretary of state Pompeo welcomes India's decision to ban Chinese apps.
[252] Kumar, A. (2023). State nationalism or popular nationalism? Analysing media coverage of TikTok ban on mainstream Indian TV news channels. Media Asia.
[253] Mohan, G. (2020). US Secretary of State Mike Pompeo praises India's decision to ban Chinese apps. India Today.
[254] Times Now (2020). India punishes Beijing betrayal after Galwan gallantry; bans 59 Chinese apps including TikTok.
[255] Kumar, A. (2023). State nationalism or popular nationalism? Analysing media coverage of TikTok ban on mainstream Indian TV news channels. Media Asia.

approach as "recontextualization"[256], the concept in fact aimed to describe the way the media reframes government actions to reinforce a specific point of view. In the context of India's TikTok ban, the narrative is clear and is meant to show the public a trend of Indian foreign policy becoming stronger and increasingly united with the West against China. Indeed, this course of action deeply reflects the evolution of the Modi-led Indian government's foreign policy, in which on the one hand, India has made choices more in line with its American partner and, on the other hand, the latter recognises the Asian giant as a "like minded partner and leader in South Asia"[257] emphasising their shared Western values against those of China. In addition, the use of key figures such as Mike Pompeo and the selection of statements that emphasise topics such as maintaining sovereignty and protecting security are ways to reinforce the official narrative promoted by the government[258].

3.3.2   "Digital Surgical Strike", How to Fight Cyber War

In this light, the media narrative seems to aim at supporting the Indian government's rhetoric and reminding the public how important this measure was in facing the great "enemy". In doing so, media coverage often used emphatic and aggressive tones, likening the TikTok ban to an actual military action. The description of the ban in the media seems to represent the "biggest cyber war"[259] ever been taken by India internationally. Kumar and Thussu (2023) have in fact translated important evidence of this narrative through the words of the Hindi channel Aaj Tak, who described the ban as "the biggest action by India" and "betting reply", but especially as "a digital strike on China"[260]. Associating the ban on TikTok with a strategic military operation creates a metaphorical language that elevates Indian action to a symbolic sphere. In support of this thesis, Kumar (2023) also quotes an excerpt from Republic TV:

> The sheer suddenness of the move, the unexpected nature of the move, the unpredictability of the move, the fact that there was no warning to the Chinese, they don't know what hit them. Now the Chinese will know. Now the Chinese will know that when we want to act, we shall act as we wish without warning. That we shall move in stealth and attack when necessary.

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[256] Fairclough, N. (2003). Analysing discourse: Textual analysis for social research. Routledge.
[257] US Warns India Against China's Aggression, Vows to Work Together. (2022). NDTV.
[258] Kumar, A. (2023). State nationalism or popular nationalism? Analysing media coverage of TikTok ban on mainstream Indian TV news channels. Media Asia.
[259] Kumar, A., & Thussu, D. (2023). Media, digital sovereignty and geopolitics: The case of the TikTok ban in India, Media, Culture & Society.
[260] Aaj Tak (2020) 59 China App की छुट्टी, बाकियों की अब ली जाएगी खबर!

Terms used in the media such as "cyber war"[261], or in particular "digital surgical strike"[262] evoke a narrative often used by Modi and Minister Shah during the successful election campaigns against Pakistan and is a useful tool to remind the public of the Indian government's strategic capability and determination to respond to threats[263].

As we will examine below, however, these narratives have many limitations, main among which is a lack of attention to the economic implications of TikTok's Indian users. Criticism of the government was actually not few, but it was silenced by channels such as WION that once again emphasised the long-term strategy of the decision, as "the damage must not be assessed in sheer economic figures"[264] and "this ban is not a standalone move. It's part of a series of moves with hopefully many more to follow"[265]. The approach is therefore clear: media try to highlight a long-term logic and persuade the most critical Indian citizens, often omitting more objective information.

Similarly, Times Now also places the ban on TikTok in a strategic military framework and justifies the act by portraying China as an unprepared counterpart to Indian tenacity. "It will take all these app companies by surprise"[266] is a key narrative mode in nationalist discourse where an attempt is made to undermine "the other"[267], highlighting its lack of preparation in anticipating such a strong Indian decision. In contrast, we find instead a strong and forward-looking India, as highlighted by the media, but without delving into the economic implications for users that this ban entailed. But again, ABP News, in an excerpt translated from Hindi, seems to confirm the trend again by describing China negatively and comparing Chinese apps to "soldiers": "the topic today is how 59 Chinese soldiers were threatening the security, unity, and integrity of India"[268].

This model is not new to scholars. Herman and Chomsky (1988) extensively analysed the media and found that they often propagandise in favour of the interests of elites and, through news selection and filtering, construct a narrative in line with that of the government

[261] Kumar, A., & Thussu, D. (2023). Media, digital sovereignty and geopolitics: The case of the TikTok ban in India, Media, Culture & Society.

[262] Kumar, A. (2023). State nationalism or popular nationalism? Analysing media coverage of TikTok ban on mainstream Indian TV news channels. Media Asia.

[263] The New Indian Express (2021). Surgical strikes sent a message: Amit Shah.

[264] Kumar, A. (2023). State nationalism or popular nationalism? Analysing media coverage of TikTok ban on mainstream Indian TV news channels. Media Asia.

[265] Kumar, A. (2023). State nationalism or popular nationalism? Analysing media coverage of TikTok ban on mainstream Indian TV news channels. Media Asia.

[266] Kumar, A. (2023). State nationalism or popular nationalism? Analysing media coverage of TikTok ban on mainstream Indian TV news channels. Media Asia.

[267] Allan, S., & Zelizer, B. (2004). Reporting war: Journalism in wartime. Routledge.

[268] ABPLIVE (2020). TikTok समेत 59 Chinese Apps Ban, जानिए कैसे ये चीनी एप भारत की एप भारत की सुरक्षा के लिए खतरा थे?

leading, however, to a limitation of public debate. This is what Hallin (1986) called the "deviance" zone, where the media exclude unbiased information in favour of the dominant political consensus. Statements such as "India punishes Beijing betrayal"[269] and media campaigns in favour of growing anti-Chinese sentiment increase internal nationalism but also confirm the trend of the media within the state.

3.3.3 "We the People of India", United Against the Enemy

Another key factor that emerged from the narrative conducted by the media after the TikTok ban was to emphasise the identity of the audience as members of a nation, united in the battle against the enemy. A significant example of emotional involvement is highlighted by Kumar (2023) through an excerpt from a programme broadcast by Republic TV:

> My dear fellow countrymen, we have a lot of differences. We battle each other. We fight, we attack we argue we debate. That's what the show is about. But at the end of it, all of us, all of us with all our myriad differences add to the diversity of our nation. We are a nation. We will fight the economic battle. The military will fight the military battles that diplomatic corps will fight the international battle we the people of India will fight the economic battle. We don't put out empty threats anymore. We have the ability, the reason, the confidence to fight the economic battle.

The explicit reference to citizens as "dear fellow countrymen" reflects a significant turning point in traditional communication, which is being transformed and finding a style of interaction that reaches out more to the individual. This innovative approach has the clear objective of creating a distinction between "us" and "them"[270] and turn news into a method of constructing reality. Despite their "differences", the Republic TV journalist calls the audience to their national and collective identity, using almost exaggerated references to community as many as 9 times in 10 sentences of the reported extract[271].

However, the narrative discourse also brings to light other elements that are vital to represent the type of narrative implemented, namely how the ban was part of a much broader picture than it seems. Indeed, Republic TV's journalist did not report the story neutrally, nor did he place himself as a neutral observer, but was part of the "imagined community"[272] united with anger and passion against the enemy. Another element in favour of this thesis lies in the strong statement "we don't put out empty threats anymore", a clear example of

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[269] Times Now (2020). India punishes Beijing betrayal after Galwan gallantry; bans 59 Chinese apps including TikTok. Youtube.
[270] Allan, S. (2004). News culture. Open University Press.
[271] Kumar, A. (2023). State nationalism or popular nationalism? Analysing media coverage of TikTok ban on mainstream Indian TV news channels. Media Asia.
[272] Anderson, B. (2006). Imagined communities: Reflections on the origin and spread of national ism. Verso.

explicit support for the government line, in that the journalist took the side of the public, reassuring them and at the same time threatening the enemy[273]. The role of language is vital in the process of identity and consciousness construction, indeed, these methods have been identified by several scholars as the basis of nationalism. The use of expressions referring to the collective, such as "we the people of India", refer to the so-called "collectivistic nationalism"[274]. The aim of this nationalist discourse is to target popular sentiment as a population united against the common enemy and to consolidate public support for the interests of the state through governmental opinions presented as objective news.

Even more emblematic is the use that has been made of anti-colonial rhetoric. In fact, the speech of a News Nation journalist, translated from Hindi, drew attention by asserting "let me tell you that News Nation's 'I am a soldier' and 'Boycott China' movement is starting to show its impact"[275]. The use of the anti-colonial slogan recalls the "Quit India"[276] movement of 1942, launched by Mohandas Karamchand Gandhi against the British colony in India. A strong comparison, where the journalist clearly compared Chinese apps to data colonisers. Once again, however, one can see how the media narrative does not analyse the technical functions of the app, but focuses exclusively on its geopolitical sphere of influence.

3.4 Implications After the Ban: Outside Narratives

As also described above, the ban on TikTok was more than just a political measure; it also brought about profound economic, geopolitical and social transformations. However, media coverage has neglected many of the more concrete implications in favour of a focus on symbolic and geopolitical aspects. For this reason, it is now crucial to go beyond what has been narrated and concretely assess the results, both positive and negative, of the ban.

To explore these implications, it is therefore appropriate to divide them into three main areas. The first dimension to which the thesis refers is also the most tangible one, namely the economic and digital sphere, where the TikTok ban had the most visible effect on the Indian market, on opportunities for Indian creators and on the emergence of new local platforms. The second sphere analysed is the geopolitical one, focusing on the significance of the ban within India's strategic relations with global partners. Finally, the thesis focuses on the third sphere, namely how the ban accelerated the drive towards achieving digital sovereignty and helped redefine India's digital

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[273] Kumar, A. (2023). State nationalism or popular nationalism? Analysing media coverage of TikTok ban on mainstream Indian TV news channels. Media Asia.
[274] Greenfield, L. (1992). Nationalism: Five roads to modernity. Harvard University Press.
[275] News Nation (2020) First wallet strike on China, now with app ban, see big debate. Youtube.
[276] The Open University (n.d.). 1942 Quit India Movement. Making Britain.

self-sufficiency and infrastructure. These steps are crucial in order to understand not only the ban's immediate impact, but also its long-term implications, offering a comprehensive view of the ban's consequences and highlighting its complexities and future opportunities.

3.4.1 Economic and Digital Implications

As described above, although the media omitted important news about the economic and digital implications of the ban, in practice it had profound repercussions on the Indian digital market and local realities, rewriting the fate of digital platforms but also the aspirations of many users and content creators. With over 200 million monthly active users, the TikTok platform was a central hub for democratising content creation and consumption, as well as a springboard for emerging influencers and creators regardless of their economic or social background. However, after its ban, India's digital market felt a serious lack, generating major economic and digital shifts. These economic losses can be summarised in three macro-categories, as described by Bellara (2023). In particular, the author describes effects on the revenues of the company behind TikTok, with ByteDance experiencing a significant drop. The loss of TikTok's services also had enormous effects on the engagement and behaviour of users, who were forced to migrate to other local platforms. All this obviously had a much broader impact at a national level, causing changes for the entire digital ecosystem. Let's therefore proceed in a structured way.

Impacts on Revenues

Among the many economic impacts the TikTok ban had, the most significant was certainly on the company's and Indian content creators' revenues. With the disconnection of its millions of users, data indicate that the ByteDance company lost approximately $6 billion in earnings[277]. The figure is huge, but the reason is related to the fact that before the ban, India was one of the largest markets abroad for TikTok[278]: an estimated 30.3% of the downloads came from Indian territory[279].

Even harder hit were TikTok's active users, i.e. content creators, causing both a drop in views and corresponding revenues. In fact, TikTok was a significant source of revenue and it is estimated that the platform's top 100 creators lost a combined annual revenue of around

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[277] Setty, N. P. (2020). TikTok ban in India and its revenue impact.
[278] Kumar, A., & Thussu, D. (2023). Media, digital sovereignty and geopolitics: The case of the TikTok ban in India, Media, Culture & Society.
[279] Banerjee, S. (2020). How TikTok's ban in India might impact influencers and brands.

120 crores[280] and this not only had negative impacts on the app, but also forced all users to migrate to new social platforms, as well as an example of a ban followed by other countries that started considering similar measures, posing a serious threat to the app's revenues and existence worldwide[281]. With this in mind, it is important to remember that the consequences of the ban were not limited to financial losses in the confined territory of India, but that the likelihood of other countries adopting similar restrictions was increasing and the pressure was mounting on the shoulders of TikTok and its parent company.

Impacts on Users and New Platforms

As just mentioned, the platform ban also had significant implications on user behaviour, an unavoidable factor when assessing the economic consequences of the measure. Indeed, the ban has impacted user engagement, forcing them to migrate to new platforms and change their digital habits. For this reason, users started looking for new virtual places where they could satisfy their need to create and consume content[282]. Emerging applications like TikTok quickly emerged, such as Josh, Moj, Chingari, Roposo, MX TakaTak and Instagram Reels. These offer short video features and quickly took over the Indian digital market, filling the gap left by TikTok. The emergence of local digital alternatives has indeed achieved significant success and significance. Josh, for instance, is an entirely Indian-made app[283] that launched just four days after the measure, experiencing rapid growth. Based in India's Silicon Valley, Josh immediately differentiated itself from its US competitors such as Facebook and Instagram, as it promoted a nationalistic narrative in that it focused on creating content in local languages and connecting with the local Bharat audience, namely the rural, non-English-speaking population of India[284]. Confirming the explosion of local alternatives made with the aim of reaching out and supporting locals, we also find MX TakaTak, later merged with Moj (launched by ShareChat, Whatsapp's Indian competitor)[285], which brought together over 100 million content creators, 300 million monthly users and 250 billion views per month, making it India's largest short video sharing platform[286]. These emerging platforms have adopted

[280] Tewari, S., (2020). TikTok ban led to ₹120 crore loss in influencer earnings in India: Report. Livemint.com.

[281] Kaye, D. B. V. et al. (2021). The co-evolution of two Chinese mobile short video apps: Parallel platformization of Douyin and TikTok. Mobile Media & Communication.

[282] Rach, M. (2021). A qualitative study on the behavioral impact of Tiktok's platform mechanics on economically driven content creators. International Journal of Social Science and Humanity.

[283] Josh. India's #1 Short Videos App.

[284]Kumar, A., & Thussu, D. (2023). Media, digital sovereignty and geopolitics: The case of the TikTok ban in India, Media, Culture & Society.

[285] Kumar, A., & Thussu, D. (2023). Media, digital sovereignty and geopolitics: The case of the TikTok ban in India, Media, Culture & Society.

[286] PTI (2022) MX TakaTak to merge with ShareChat's Moj short video platform. Business Standard.

relevant strategies to reach Indian users, supporting the use of regional languages, customising functional features for the target audience and fostering local technological innovation.

Although the launch of local platforms was swift, the same cannot be said for the adaptation of users, some of whom struggled to find among the alternatives any platform that could offer the same features and functionality that had made TikTok so attractive to influencers[287]. The dispersion of users also led to a sharp decline in popularity for TikTok, as well as a reduction in visibility and income for all those creators who found it difficult to rebuild their audiences on new social media, especially considering that the opportunities to reach a wider and international audience had been significantly reduced[288]. This was also because TikTok was a symbol of democratisation, a virtual place where any person regardless of their background was given room to grow. Creators, like Veer Sharma interviewed by the New York Times, who had millions of followers and a humble background in an instant lost everything[289]. But also, the film critic and creator online, Sucharita Tyagi, interviewed by BBC, declared to think that the ban was unfair[290]. This situation has led many creators to migrate to other local platforms, but with little success. In fact, except for some users who managed to rebuild their audience in other apps, most of them felt that something was lost in the post-TikTok Indian digital landscape[291]. So, outside media narratives, the general sentiment in India was fragmented: on one hand the media and authorities believed that the measure was necessary to reaffirm the country's status; on the other hand, active and passive users perceived the ban as a deprivation of crucial economic, social and cultural opportunities, reflecting a dualism that the media had not reported. Not only that, the lack of engagement, differences in algorithms and limited distribution of content caused an obvious gap in India's digital ecosystem.

Impacts on the Digital Ecosystem

More precisely, banning TikTok in India had strong repercussions in the digital marketing ecosystem. The measure prompted the companies behind the platforms to redirect their marketing strategies and invest in other digital alternatives. Bellara (2023) identified major disruptions for new corporate investment programmes, which overnight had to find new

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[287] Mishra, M., et al. (2022). TikTok politics: Tit for tat on the India–China cyberspace frontier. International Journal of Communication.
[288] Bellara, D. (2023). The Economic Impact of the Ban on TikTok in India. International Journal of Novel Research and Development (IJNRD).
[289] Travelli, A., & Raj, S. (2024). What Happened When India Pulled the Plug on TikTok. The New York Times.
[290] Germain, T. (2024). The ghosts of India's TikTok: What happens when a social media app is banned. BBC.
[291] Germain, T. (2024). The ghosts of India's TikTok: What happens when a social media app is banned. BBC.

ways to reach the audience that had migrated from TikTok. The relocation of the advertising budget was one of the most affected areas. In fact, before TikTok was banned, companies invested heavily in advertising on TikTok, since they knew they were targeting a large audience and through engaging video formats[292]. Yet, in post-TikTok India, this was no longer possible and companies had to invest in the alternatives available in the digital marketplace. This obliged marketers to explore new realities and new marketing strategies that at first seemed to gain positive feedback, but soon users and online businesses realised that new platforms would never be able to replicate the degree of interaction and heterogeneity provided by a global app like TikTok[293]. Thus, not only content creators had to rebuild their communities from zero, but also companies had to reinvent their image and audience[294]. The difficulty in achieving this lies in the fact that the target users are now fragmented into different apps, making the audience more difficult to reach and forcing the implementation of diverse programmes on platforms such as Instagram, Facebook and YouTube[295].

3.4.2   Geopolitical Implications

The media coverage analysed in the previous subchapter, in contrast to the limited attention paid to the economic implications, seems to make no secret of the geopolitical trends that characterise the picture. In particular, as described by Kumar and Thussu (2023), it would be impossible not to include the media "unidimensional approach"[296] in favour of the government's agenda in the context of more obvious geopolitical needs, namely India's growing alignment with the United States and the constant fear of a threat from Chinese expansionism.

As analysed earlier, after the Cold War period, India has historically maintained a strict policy of non-alignment towards the two rivals, the US and the Soviets. Despite this apparent safe distance, some scholars have actually accused India of leaning more towards the USSR for reasons of strategic interest[297], while preserving a prominent status among post-colonial countries through its efforts to keep cooperation and democracy strong. As we all know,

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[292] Toscher, B. (2021). Resource Integration, Value Co-Creation, and Service-dominant Logic in Music Marketing: The Case of the TikTok Platform. International Journal of Music Business Research.

[293] Duffy, B. E., et al. (2021). The nested precarities of creative labor on social media. Social Media+ Society.

[294] Bellara, D. (2023). The Economic Impact of the Ban on TikTok in India. International Journal of Novel Research and Development (IJNRD).

[295] Duffy, B. E., et al. (2021). The nested precarities of creative labor on social media. Social Media+ Society.

[296] Kumar, A., & Thussu, D. (2023). Media, digital sovereignty and geopolitics: The case of the TikTok ban in India, Media, Culture & Society.

[297] Pant, H.V., & Super, J.M. (2015). India's 'non-alignment' conundrum: A twentieth-century policy in a changing world. International Affairs.

however, India's foreign policy has undergone a major shift from being a neutral spectator to actively entering the international game through its multi-alignment, especially with the United States in the economic and security fields[298].

It was precisely during the period of the TikTok ban, in 2020 and 2021, that India and the US increased their partnership the most. Indeed, during this period, the US ally has been India's largest export partner and second largest trade partner[299]. For India, the US has been a crucial economic partner, in fact, exports were estimated to be worth about $51.62 billion, while imports were about $25.88 billion[300]. In total, trade between the two partner countries reached $157 billion, reaching the highest level of their trade relations for the first time[301]. On the defensive side, relationships grew similarly and exponentially, reaching a value of more than $20 billion in 2020[302].

So, what does all this data point to? The renewed cooperation between the two countries clearly highlights the need for both countries to counter rising China. On the one hand, India wanted to confront China on an equal footing for various reasons, including its rapid economic expansion, its support for its neighbour and enemy Pakistan, its constant fighting and lack of sensitivity on the border and China's opposition to India's seat on the UN Security Council[303]. On the other hand, the US sees China as a threat on many fronts, namely its economic and digital rivalry, its influence with former allies, its military growth and the challenge it poses to the US given its expansionist ambitions[304]. These factors, together with the economic consolidation and strategic position of the Asian ally, have led the two countries to operate on a "mutually beneficial strategic doctrine"[305].

These dynamics are also clearly reflected in India's decision to ban TikTok, following numerous warnings from the US about data security. The alliance is evident when one considers that India has accused TikTok of stealing Indian users' data and sharing it with the CCP acting against national security but, paradoxically, has not acted in the same way with

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[298] Kumar, A., & Thussu, D. (2023). Media, digital sovereignty and geopolitics: The case of the TikTok ban in India, Media, Culture & Society.
[299] Kumar, A., & Thussu, D. (2023). Media, digital sovereignty and geopolitics: The case of the TikTok ban in India, Media, Culture & Society.
[300] Kumar, A., & Thussu, D. (2023). Media, digital sovereignty and geopolitics: The case of the TikTok ban in India, Media, Culture & Society.
[301] Bureau of South and Central Asian Affairs (2022) U.S. Relations With India. U.S. Department of State.
[302] Bureau of Political-Military Affairs (2021) U.S. Security Cooperation With India. U.S. Department of State.
[303] Kumar, A., & Thussu, D. (2023). Media, digital sovereignty and geopolitics: The case of the TikTok ban in India, Media, Culture & Society.
[304] Office of the Secretary of State (2020) The elements of the China challenge. The Policy Planning Staff, Office of the Secretary of State
[305] Kumar, A., & Thussu, D. (2023). Media, digital sovereignty and geopolitics: The case of the TikTok ban in India, Media, Culture & Society.

regard to US apps, such as Facebook, which have faced similar accusations. Of course, the distinction between US and Chinese apps exists and lie in the separation between state and private ownership in the former and the censorship applied to the latter[306]. It is no coincidence, in fact, that following the ban India and the US renewed their cooperation during the Indo-US 2+2 Dialogue against "growing national security threats from both state and non-state malicious cyber actors"[307] and recognised the need for a free and secure virtual space[308].

3.4.3 Digital Sovereignty Implications

The media coverage finally brought to the surface an extremely important element following the ban on TikTok, namely the regaining of Indian digital sovereignty. In particular, a few days after the implementation of the ban, the English-language channel India Today initiated a debate about Chinese video surveillance systems installed in New Delhi, as analysed by Kumar and Thussu (2023). To get to the heart of the matter, it will simply be necessary to resume some excerpts from their debate. "Chinese eye spying on India" and "Can China monitor India?"[309] are just some of the sensationalist claims that hide a deeper need, namely India's desire to assert its digital sovereignty and self-sufficiency. This can be seen in the Atma-Nirbhar Bharat (self-reliant India) programme in which the government expressed its desire to build a digitally advanced country through the Digital India Initiative of 2015. Referred to as the "Umbrella Programme", it covers several areas, but three are the main ones, namely the "Digital Infrastructure as a Utility to Every Citizen", "Governance & Services on Demand" and "Digital Empowerment of Citizens"[310]. It is clear that the ban on TikTok was therefore part of a broader framework in which the aim was to promote the development of technological infrastructure and greater digital literacy in order to connect as many citizens and rural areas as possible to the Internet[311]. Scholars actually see the Indian case as a clear effort to strengthen its digital self-sufficiency and economy[312], rather than a mere lack of trust.

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[306] Kumar, A., & Thussu, D. (2023). Media, digital sovereignty and geopolitics: The case of the TikTok ban in India, Media, Culture & Society.

[307] Office of the Spokesperson (2022). Fourth Annual U.S.-India 2+2 Ministerial Dialogue. U.S Department of State.

[308] Ministry of External Affairs (2022) Joint statement on the Fourth India-U.S. 2+2 Ministerial Dialogue. Government of India.

[309] India Today (2020) Is China tracking Delhiites using Chinese CCTV cameras in New Delhi?

[310] Department of Electronisc and Information Technology (n.d.). Digital India – A programme to transform India into digital empowered society and knowledge economy. Government of India.

[311] Kumar, A., & Thussu, D. (2023). Media, digital sovereignty and geopolitics: The case of the TikTok ban in India, Media, Culture & Society.

[312] Prasad, R. (2022). People as data, data as oil: The digital sovereignty of the Indian state. Information Communication & Society.

In fact, this approach has led to a major transformation in India's digital landscape in recent years. In an attempt to ensure a digital sovereignty in which data is the "new oil"[313], ambitious initiatives have actually had positive results overall. Take digital payments, for example. Previously, 70% of the population from rural areas contributed to the national economy through banknotes[314]. Now, thanks to the so-called JAM (an acronym for Jan Dhan, the banking system that has connected the population; Aadhar, the biometric identification system; and finally, Mobile) has brought digital connectivity and education to rural areas[315]. Moreover, indigenous platforms such as India Stack and Unified Payments Interface (UPI) have facilitated the country's rapid digital transformation, virtually bringing government, businesses and citizens closer together, facilitating digital transactions and permitting citizens to exercise full control over their data[316]. This not only promoted digital transfers among the population, but also benefited small businesses, leading to a 160% increase in transactions in the first five years after the ban, realising India's dream of becoming one of the countries with the most exponential growth in the sector[317].

Despite the objective positive digital implications after the TikTok ban, India's digital expansion still faces several challenges, mainly two. The first is that native platforms still struggle to find investors; in fact, some of them were financed by Chinese companies before the measure. Moreover, the laws relating to the digital sector are still quite outdated in India. Despite the innovations introduced because of the ban, the country is not yet fully advanced in the digital sphere to be able to independently guarantee a total digital expansion for the Indian market[318].

Conclusion of Chapter 3

This third chapter aimed to represent the central focus of the thesis by analytically highlighting how the Indian case is an emblematic example of the encounter between geopolitics and the digital. Through an in-depth exploration of the historical relationships, the official and geopolitical reasons behind the ban, the media narratives and the post-TikTok implications on various sectors, it was

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[313] Hindustantimes (2019). "Data is the new oil, new gold" says PM Modi in Houston.
[314] Kumar, A., & Thussu, D. (2023). Media, digital sovereignty and geopolitics: The case of the TikTok ban in India, Media, Culture & Society.
[315] Kumar, A., & Thussu, D. (2023). Media, digital sovereignty and geopolitics: The case of the TikTok ban in India, Media, Culture & Society.
[316] D'Silva, D., et al. (2019). The design of digital financial infrastructure: Lessons from India. BIS Paper.
[317] Kearns, J. and Mathew, A. (2022). How India's Central Bank helped spur a digital payments boom. International Monetary Fund.
[318] Kumar, A., & Thussu, D. (2023). Media, digital sovereignty and geopolitics: The case of the TikTok ban in India, Media, Culture & Society.

possible to place the Indian government's measure beyond a simple case of technological regulation, shaping a phenomenon of international significance.

From a historical point of view, the chapter sought to emphasise the historical rivalry between the two countries, highlighting territorial disputes, strategic rivalries and conflicting ambitions that have always existed and have been amplified in recent decades. Analysing the Galwan clash in June 2020 was a focal point that had to be highlighted to represent the breaking point of an already fragile relationship that made evident a so far concealed rivalry. Indeed, this event not only led to the death of Indian soldiers and a growing mutual distrust, but also paved the way for the Indian government to take irreversible decisions. In this sense, banning TikTok and 58 other apps of Chinese origin as a response to the clash represented much more than expected.

This was evident in the comparison made between the official motivations and the more intrinsic and geopolitical ones behind the ban. The former clearly reflect the words used by the Indian government in publishing the measure, in which the growing relevance of cyberspace as the new arena in which countries confront each other is evident. Indeed, the Indian government declared the measure necessary and as a response to China's threatening actions to protect its citizens from data exploitation and cyber dangers, likening Chinese apps to tools of influence and surveillance. However, the analysis in the next section is only a natural extension of an argument started in the very first chapter, namely that the official reasons for the ban are intertwined with complex geopolitical motivations. As much as the TikTok ban was conceived as a governmental security measure, this was actually a symbolic act of resistance to Chinese influence, strengthening alliances with strategic partners such as the US and Quad, and promoting a strong and autonomous national identity for a long-subjugated India.

Following the logic of the study, the construction and symbolic perception of the measure was particularly influenced by one factor, namely the role of the media and their narrative approach to public sentiment. In particular, the Indian media helped legitimise the ban in the eyes of the public, portraying it as a necessary choice to protect the nation from China. Through emphatic terms, the media painted a specific image of China, portraying it as an isolated enemy against the entire world, as India now had powerful alliances outside and inside the region. Furthermore, special emphasis was placed on describing the ban as a "digital surgical strike", comparing it to a strategic military action by a strong country that does not submit. However, the most crucial element in the analysis is the galvanisation of nationalistic sentiment, in which the national media directly addressed the Indian people as strong and united, despite strong differences, against a common enemy threatening their homeland. As well pointed out, in actual fact, the real sentiment of the Indian population was against the TikTok ban because it not only took away a significant source of entertainment, but also a vital

economic resource for numerous content creators and influencers. It is therefore clear that this narrative in support of the ban had severe limitations, as the media concentrated on justifying the ban rather than objectively reporting the information, neglecting important elements about the economic, technological and social implications of the ban and strongly reducing public debate.

Last but not least, the implications following the ban have broadened the understanding of the case study, as they shed light on the real effects the measure had on different levels. Specifically, at the economic and digital level, the TikTok ban reshaped the Indian digital market, leading to the advent of new local platforms and new habits for users and companies. However, the disappearance of TikTok from the Indian market has caused severe losses. Firstly, for ByteDance, as India was a relevant economic reality for the platform; secondly, for users such as content creators and influencers who saw their audience migrate to new social media; and, finally, for local companies who had to develop new marketing to reach audiences now fragmented across different apps. On the other hand, on a geopolitical level, the ban had positive effects on the strengthening of alliances with partners and on its image as a model country in digital regulation as an instrument for global strategy. Finally, the ban was an important first step towards India's dream of achieving complete digital sovereignty and technological self-sufficiency. Although challenges remain for the Asian peninsula, the ban has indeed accelerated the country's technology push.

So, to put in a nutshell, the Indian case study was a significant event in understanding how geopolitical relations can influence today's global technological landscape and, at the same time, how digital has become a vital key factor in international dynamics. Therefore, the chapter aimed to demonstrate how the TikTok ban was not a simple governmental response to a border conflict, but the result of a strategic geopolitical decision that redefined crucial aspects in bilateral relations between India and China, but also internationally. Looking towards the present and the future, the challenges and opportunities arising from this case offer important insights into the geopolitical relations that surround us nowadays and a basis for understanding the survival of digital platforms between digital sovereignty and geopolitics.

CHAPTER 4: GLOBAL COMPARISONS AND FUTURE IMPLICATIONS

The detailed case study of India's TikTok ban in 2020 offered an important first model to explain how the Chinese digital platform has become a real geopolitical instrument during the era of digital sovereignty. Through a scrupulous analysis of the historical dynamics behind the ban, the political motivations, the media narratives and the broad implications that accompanied the measure, a strongly correlated pattern emerged between geopolitical dynamics and the global digital landscape. Indeed, the Indian case not only highlights the growing role of digital sovereignty as a strategic priority for states, but also focuses on how digital platforms can be used as tools to influence geopolitical balances in the contemporary world. Not surprisingly, what makes the Indian case study even more interesting is its ability to create a cascading effect and influence other countries, creating a model that can be replicated and adapted according to national contexts and the geopolitical needs of individual states.

From this point forward, the thesis can now broaden its gaze to other, more recent international contexts, examining how much and how the Indian ban has set in motion the behaviour of states in other regions of the world towards TikTok and identifying common patterns or differences. As the recent New York Times article pointed out, the Indian case has indeed triggered a cascade reaction in other countries around the world, fuelling debates on sovereignty and technological security[319]. This chapter therefore aims to compare recent developments in the United States, the European Union and other key areas that can demonstrate whether the ban on TikTok can indeed be used as a geopolitical tool in international relations or has been an isolated case in India's territory. In addition, through this comparative and prospective study, the reader can gain essential insights into the context of today, but more importantly, the future of TikTok, and other platforms, as well as the geopolitical dynamics related to it. This concluding chapter will therefore serve to understand whether TikTok's ban in India in 2020 was an isolated case or part of a broader strategy to shape the technological (and beyond) world order of this century.

In order to conclude the reasoning of this thesis, the fourth and final chapter will be divided into three main sections. The first will analyse the approaches taken towards TikTok in different geopolitical and geographical contexts, including America, Europe, Asia, Oceania and Africa. The aim of this first section will be to highlight how the regulations implemented by states reflect international alliances, domestic priorities and the relationship with China in each context. The second section will be devoted to an in-depth exploration of the findings and patterns that emerged from the cases introduced, highlighting the role of geopolitics in the TikTok issue, the main concerns shared

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[319] Tobin, M. (2025). TikTok Is Facing Legal Backlash Around the World. The New York Times.

and the actual perception of TikTok as a geopolitical instrument, with possible exceptions. Following this, the third section will delve into the future trajectories of the international technological landscape, with a focus on the broader implications of TikTok's fate with respect to the global economic, political and digital sovereignty scenario. Specifically, the near future of digital platforms will be contextualised, analysing the short-term and long-term implications to explore how geopolitical tensions and regulatory strategies will influence the evolution of platforms, such as TikTok, and related international realities. At the same time, this will foster the development of a broader reflection to outline the future scenarios of platforms, providing a well-rounded view of the challenges and opportunities that platforms will face during the 21st century.

4.1 TikTok Ban Beyond India: A Comparative Analysis

The following comparison of the approaches adopted in different regions of the world towards TikTok offers an extensive and layered view of contemporary geopolitical relations. In this sub-chapter, the most emblematic cases of recent years will be analysed in a general way. The primary objective is to give the reader a general perspective on how each country's relationship with China, positive or negative, has influenced the normative approach to the TikTok issue.

Since the topic is recent and there is consequently no extensive literature on the comparative study of countries' responses to TikTok, the countries selected for analysis represent only a few of the most emblematic cases of regulation of the app: on the one hand, the US allies, who see the Chinese rival as a threat and tend to justify the ban as protection of national cyber security. This is the case for countries gripped by multilateral coalitions and intelligence alliances, while the European Union, often in opposition to US activities, offers an interesting view outside of strong alignments. On the other hand, countries that have closer political and economic relations with China seem to opt for more permissive approaches. For this reason, the section aims to call attention to the similarities between those countries that share converging geopolitical aspirations and explore the exceptions that might challenge this assumption, with the purpose of understanding how TikTok can be perceived as both a threat and an opportunity, depending on the geopolitical dynamics of each region. It is evident that it is not possible to encapsulate the complexity of the issue on every continent, but the thesis thus divided aims to give the reader a general overview of the topic and outline the main trends characterising countries' approaches to the Chinese platform.

In order to achieve this, the sub-chapter must be divided into five different sections by continent. The first will be dedicated to the American continent, a divisive territory for TikTok, in which US and Canadian cases will be highlighted. The second section is devoted to the European

continent, where the approach is fragmented and more technical. In the third part, the focus is on Oceania, especially Australia, with its strong links to western countries. Asia will be addressed in the fourth section, where the complexities of regulation in the region shared with China will be analysed. Finally, part five will focus on Africa and its approach to maintaining political stability.

4.1.1 America

Generally speaking, on the American continent, TikTok has been widely used. Countries such as the United States, Brazil and Mexico are among the largest markets in terms of number of users[320]. However, despite its enormous success on the continent, doubts arose just as quickly about its safety. A complex intersection of political measures and internal debates has called into question TikTok's presence on the continent. While in South America the major restrictions concern the removal of content[321], in North America, the situation is more serious and mainly two relevant cases emerge.

Since TikTok's international launch in 2017, the app has achieved huge commercial success in the US, counting around 170 million monthly active users in 2024[322] and even surpassing Facebook in terms of popularity in 2020[323]. However, following accusations of its alleged association with the Chinese parent company and censorship activities on topics sensitive to the Chinese government[324], since 2019 the US authorities have started to take restrictive measures against the app for reasons of national security. Proceeding chronologically, in 2020 the Pentagon banned TikTok on military devices and the first Trump administration issued the executive order to ban TikTok and any related transactions on the grounds that it was a threat to the security of the country[325], recalling the risk to data, personal information and even biometric profiles[326]. However, with the inauguration of former President Joe Biden in 2021, the previous administration's order was temporarily revoked[327]. However, in 2022 came the turning point, as BuzzFeed published an article reporting that ByteDance employees had access to users' personal information[328]. This forced TikTok to

[320] Ceci, L. (2024). Countries with the largest TikTok audience as of July 2024. Statista.
[321] Statista (2024). TikTok in Latin America - statistics & facts.
[322] Yuquan, L. (2024). The Risks of TikTok in the Context of Digital Sovereignty: A Case Study of the U.S. Ban on TikTok. International Journal of Education and Humanities.
[323] BBC (2021). TikTok named as the most downloaded app of 2020.
[324] Harwell, D. & Romm, T. (2019). TikTok's Beijing roots fuel censorship suspicion as it builds a huge U.S. audience. The Washington Post.
[325] Allyn, B. (2020). Trump Signs Executive Order That Will Effectively Ban Use Of TikTok In the U.S. NPR.
[326] Ceci, L. (2025). Timeline of events: TikTok ban in the U.S. Statista.
[327] Rogers, K. & Kang, C. (2021) Biden Revokes and Replaces Trump Order That Banned TikTok. The New York Times.
[328] Baker-White, E. (2022). Leaked Audio From 80 Internal TikTok Meetings Shows That US User Data Has Been Repeatedly Accessed From China. BuzzFeed News.

comply with the country's regulatory demands, such as transferring data to local Oracle servers, in the so-called Project Texas. Despite this, at the end of the year, the US Congress banned the app on federal government devices, which TikTok clearly called a "political gesture"[329]. The situation continued until former President Biden signed the H.R.2670[330] act imposing a ban on TikTok on government and federal devices in December 2023 and the H.R.815[331] which demanded to the parent company ByteDance to sell TikTok within 270 days or it would be banned[332]. The measure caused widespread and divisive debate among citizens[333], while on the political front support was bipartisan, receiving positive feedback from both Republicans and Democrats[334]. The Supreme Court, however, upheld the sale (or ban) of TikTok to 19 January 2025, and on that day, a message appeared on the home screen of the US Citizens app warning that the app was currently blocked, but that re-elected President Trump was working to restore it[335]. And, in fact, in a political twist the newly re-elected Trump administration reinstated the app a few hours later, helping to fuel debates about its significance and future on US soil. Thanks to Trump's 75-day extension, ByteDance will now have until 5 April to sell TikTok to a US buyer[336].

On the American continent, another country has also taken important steps in containing the Chinese app. This is the case of Canada which, following in the footsteps of the United States, is however adhering to a more moderate approach than other Western countries with which it shares alliances and close relations. Still in the context of data protection and foreign influence, in fact, the Canadian government has announced a ban on TikTok on government devices from the end of February 2023, highlighting national security concerns[337]. Similarly to the US experience, the decision was based on a high level of privacy and security risk concerning mainly government information. More recently, in November 2024, the government ordered the app to cease its operations in the country due to fears of Chinese influence and, under the advice of security and intelligence experts, TikTok's offices in

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[329] Fung, B. (2022). US House bans TikTok from official devices. CNN Business.

[330] Congress.Gov (2023). H.R.2670 - National Defense Authorization Act for Fiscal Year 2024.

[331] Congress.Gov (2023). H.R.815 - Making emergency supplemental appropriations for the fiscal year ending September 30, 2024, and for other purposes.

[332] Yuquan, L. (2024). The Risks of TikTok in the Context of Digital Sovereignty: A Case Study of the U.S. Ban on TikTok. International Journal of Education and Humanities.

[333] Ceci, L. (2025). Share of adults in the United States supporting new legislation that would lead to a ban of TikTok as of December 2024. Statista.

[334] Ceci, L. (2024). Opinion of adults in the United States over the government banning TikTok as of March 2024, by party identification. Statista.

[335] Gerken, T. et al. (2025). What does Trump's executive order mean for TikTok and who might buy it. BBC.

[336] Lamperti, L. (2025). Perché TikTok sceglierà di chiudere negli Stati Uniti: cosa c'è dietro il (prossimo) patto con Trump. La Stampa.

[337] Treasury Board of Canada Secretariat (2023). Statement by Minister Fortier announcing a ban on the use of TikTok on government mobile devices. Government of Canada.

Vancouver and Toronto were closed[338]. Although Canadian users can still access the platform, the Minister of Innovation, François-Philippe Champagne, advised them to avoid access in order to prevent their data from being gathered by the Chinese government[339].

4.1.2   Europe

Also in Europe, TikTok has experienced rapid growth and great success in terms of user numbers[340]. Unlike the US continent, in the European region, total bans were not imposed, but on the contrary, the approach was fragmented and equally complex. However, we can outline two significant examples that encapsulate the general line in the European area.

The case of the European Union in the regulation of foreign technologies is extremely interesting. Indeed, the EU has established itself as a global leader in data protection regulation through the General Data Protection Regulation (GDPR)[341] of 2016, regarded internationally as the "gold standard"[342] in the protections of users' rights. In addition, the EU has implemented relevant measures, such as the 2022 Digital Services Act (DSA)[343], to regulate digital platforms and search engines and the 2024 AI Act[344], to regulate the use of artificial intelligence. Unlike the US, and the cases we will see later, the EU does not focus exclusively on countering Chinese platforms such as TikTok for reasons of national security, but rather the intention is to challenge all foreign interference and, consequently, also the dominance of US platforms in the digital market, such as the so-called "Big Five"[345]. At the same time, even the European Union has not been without geopolitical pressures that have shaken its confidence in the Chinese-originated app. In point of fact, in February 2023, the European Commission initiated formal proceedings to assess whether or not TikTok had violated the DSA, which imposes security obligations on platforms with more than 45 million users[346]. So, in a similar way to the US case of 2022, a few days later the main European institutions, namely the European Commission, the European Council and the European Parliament, banned their employees from using the app on their devices, for cyber security reasons[347].

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[338] Milmo, D. (2024). Canada orders TikTok to close offices over 'security risks'. The Guardian.
[339] Gutelle, S. (2024). Canada is ordering TikTok to shut down its offices in Vancouver and Toronto (but the app isn't banned yet). Tubefilter.
[340] Dixon, S. J. (2024). Number of TikTok users in Europe from 2018 to 2028. Statista.
[341] GDPR-Info (2016). General Data Protection Regulation GDPR. Intersoft Consulting.
[342] European Data Protection Supervisor (n.d.). The History of the General Data Protection Regulation.
[343] European Commission (2022). The Digital Services Act: Ensuring a safe and accountable online environment.
[344] Shaping Europe's digital future (2024). AI Act.
[345] Bernot, A. et al. (2024). Governing Chinese technologies: TikTok, foreign interference, and technological sovereignty. Internet Policy Review.
[346] European Commission (2024). Commission opens formal proceedings against TikTok under the Digital Services Act.
[347] Foo, Y. CH. (2023). European Parliament latest EU body to ban TikTok from staff phones. Reuters.

Some member states also requested not to use the app on their company phones, including Belgium, Denmark and the Netherlands[348]. However, unlike the United States whose ban was closely linked to the perception of the Chinese antagonist, the European decision avoided an explicitly geopolitical narrative, preferring a more technical and data security-oriented approach, addressing both Chinese and US actors. Nevertheless, this decision created strong debates, resulting in a fragmented implementation, as some member states questioned its necessity[349] and some MEPs denounced its superficiality[350].

In recent months, another emblematic European case has emerged prominently. Also with regard to the regulation of disinformation and content moderation, the EU seems to be a global leader. Specifically, through the 2022 Code of Practice on Disinformation, the EU has set ambitious goals, including monitoring digital platforms, such as TikTok, to ensure political transparency and access to data for effective fact-checking[351]. And right here, the well-known app returned to the centre of debates during the Romanian elections of 2024. In particular, the European Commission requested a formal investigation into TikTok and its controversial role in the first round of the Romanian elections, which led to the unexpected victory of far-right candidate Călin Georgescu. According to the Snoop.ro investigative agency, the candidate's political party, the Romanian National Liberal Party (NLP), allegedly launched a controversial and illegal election campaign on TikTok that gave the pro-Russian candidate, until then little known on the Romanian social media scene, a significant advantage[352]. Consequently, because of this campaign, which was illegally not marked as electoral content, the Constitutional Court annulled the vote[353], raising fears about TikTok's role in likely Russian influence. Furthermore, based on the DSA, the European Commission accused TikTok of not knowing how to handle cases of foreign interference that could undermine the very concept of democracy. According to the Commission President, Ursula Von Der Leyen "We must protect our democracies from any kind of foreign interference […] It should be crystal clear that in the EU, all online platforms, including TikTok, must be held accountable"[354]. Despite the accusations, TikTok denied having treated Georgescu differently and informed that it had

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[348] Taylor, A. et al. (2025). Where is TikTok banned? These countries restrict the app. The Washington Post.

[349] Bernot, A. et al. (2024). Governing Chinese technologies: TikTok, foreign interference, and technological sovereignty. Internet Policy Review.

[350] Goujard, C., et al. (2023). Brussels banned TikTok. Politico.

[351] Shaping Europe's digital future (2022). The 2022 Code of Practice on Disinformation.

[352] Neag, M. et al. (2024). ANAF a descoperit că PNL a plătit o campanie care l-a promovat masiv pe Călin Georgescu pe TikTok. Snoop.ro

[353] Goury-Laffont, V. (2024). Report ties Romanian liberals to TikTok campaign that fueled pro-Russia candidate. Politico.

[354] European Commission (2024). Commission opens formal proceedings against TikTok on election risks under the Digital Services Act.

taken action. Yet, the situation for TikTok is not bright, since in the event that it has violated the DSA, the EU should consider severe measures, without excluding a ban[355].

TikTok is an equally complex issue for the UK authorities, as the report published by BuzzFeed in 2022 also shook the foundations of the UK technology landscape. Previously, TikTok had already reassured the authorities about security concerns, declaring in 2020 that Chinese employees could in no way access data for CCP surveillance purposes.[356] But, after the report, new measures have been adopted. For this reason, after a security review[357], in March 2023, TikTok was banned on all parliamentary devices for security concerns without, again, giving specific explanations[358]. The statement by the Prime Minister, Rishi Sunak, emphasised the importance of safeguarding national security, but also the explicit strategic alignment with the allies, stating "we look at what our allies are doing"[359]. Again, the British approach is part of a narrative in which the priority is to safeguard national security from foreign influence, focusing on data governance, but at the same time calling for an approach aligned with the western allies. However, in recent times following the TikTok ban in the US in January 2025, it was stated by Minister Darren Jones that further plans will only be in place if there is a threat[360].

4.1.3   Oceania

The case of Australia is another emblematic example of a targeted approach to security, digital sovereignty and alignment. The measures implemented by the Australian government in response to growing concerns were aimed at protecting sensitive government data while reducing misinformation and preventing risks associated with foreign social media[361]. Specifically, in April 2023, the Australian government announced a ban on TikTok on all government devices[362] for security reasons following growing concerns of data collection by the Chinese government via the digital platform[363]. The Australian government has long had concerns about the role of social platforms. Indeed, the 2022 the Senate Select Committee on

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[355] Hayer, V. (2024). Renew Europe.
[356] Bernot, A. et al. (2023). Governing Chinese technologies: TikTok, foreign interference, and technological sovereignty. Internet Policy Review.
[357] Bernot, A. et al. (2023). Governing Chinese technologies: TikTok, foreign interference, and technological sovereignty. Internet Policy Review.
[358] Cabinet Office (2023). TikTok banned on UK government devices as part of wider app review. Gov.UK
[359] Whannel, K. (2023). Security minister asks cyber experts to investigate TikTok. BBC.
[360] Brown, F. (2025). 'No plans' for UK to follow US and ban TikTok, minister says. Sky News.
[361] Bernot, A. et al. (2023). Governing Chinese technologies: TikTok, foreign interference, and technological sovereignty. Internet Policy Review.
[362] Attorney-General's Portfolio (2023). TikTok ban on Government devices.
[363] Reuters (2023). Australia bans TikTok on government devices over security concerns.

Foreign Interference through Social Media report[364] highlighted how TikTok's features and algorithm can be exploited to spread disinformation during democratic elections. Furthermore, after BuzzFeed's 2022 report, Senator James Paterson also sent a letter of clarification to TikTok about Australian user data[365]. Although TikTok responded that Australian data was stored in Singapore and the United States, as analysed in chapter two, it was also revealed that employees in China actually could access user data[366]. Clearly, the statement triggered significant security concerns in the country. The Australian response to the TikTok phenomenon is therefore not limited to justification related to the protection of sensitive government and user data, but instead follows a broader geopolitical strategy, recognising the role of foreign digital platforms as possible means of influence and threats to countries' digital sovereignty. Furthermore, Australia's alignment with Western allies once again highlights important and meaningful international cooperation in responding to modern challenges posed by authoritarian state actors.

The Australian context is also joined by that of the New Zealand government, which in March 2023 declared its intention to ban the Chinese app on parliamentary devices, following concerns about international security. The MPs were informed of the choice by an email that explicitly stated that the ban had been adopted after a discussion with their international colleagues[367].

4.1.4 Asia

The Asian continent represents a very complex territory for TikTok to operate in, since here geopolitical dynamics are intertwined in a complex and different way compared to the Western context; suffice it to say that China itself, despite being the app's country of origin, has actually replaced the international version with a version more suited to CCP needs. As for the rest of the geographical region, countries have adopted different approaches that oscillate between regulations and, some, even bans.

As for Russia, embedded in the Asian continent for contextual reasons, it is a significant contemporary ally of China. However, the relationship between the two countries and TikTok has revealed complex geopolitical dynamics that add up to issues of censorship, security and media influence. Specifically, following the invasion of Ukraine in 2022, Russia criminalised the dissemination of conflict-related disinformation on TikTok. In response, the app restricted

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[364] Parliament of Australia (2022). Select Committee on Foreign Interference through Social Media.
[365] Mason, M. (2022). TikTok's local user data under scrutiny. The Australian Financial Review.
[366] Bernardone, L. (2022). Australian TikTok data can be accessed by China. Information Age.
[367] McClure, T. (2023). New Zealand to ban TikTok from government devices. The Guardian.

the uploading of new content from the territory and only allowed viewing of pre-conflict content[368]. The compromise was perceived as an alignment of TikTok with the demands of the Russian government, thus creating a virtual safe space for national propaganda. In September 2024, however, TikTok announced that it had banned Russian state media profiles accused of covert influence in the run-up to the US presidential election. The effort on the part of the app was perceived as part of a major fight against foreign disinformation and interference, but also to strong criticism in Russia, which accused the platform of censoring a different perspective.[369]

Since October 2020, the Pakistani authorities have banned TikTok four times. All four bans were justified due to content that was deemed inappropriate[370] and then lifted following negotiations between TikTok and Pakistani authorities with the aim of bringing the app's functionality in line with local regulations. Therefore, the reasons for the bans are not related to geopolitical insecurity, but purely internal reasons. Despite its very close economic relations with China, Pakistan has remained firm on content moderation, but cooperative in finding a way to keep the platform active.

Although many countries in the world took action after the Indian case in 2020 to restrict TikTok, few of them completely banned the app. Among them is the case of Nepal, where the government decided to ban it in November 2023 because it "disturbs social harmony and disrupts family structures"[371], without citing reasons of Chinese influence. However, after nine months of restriction, the Prime Minister removed the ban, as TikTok agreed to comply with the regulations appointed by the government and established a dedicated cybercrime prevention unit in cooperation with the Nepalese police[372].

TikTok has also faced regulatory pressures in several Central Asian countries. For example, in Kazakhstan the Minister of Culture said he considered the ban of TikTok due to inappropriate content, while in Kyrgyzstan there were mentioned risks to the mental health of young people. Also, in Uzbekistan TikTok has had problems with the authorities regarding the location of data and alleged violations on personal data[373]. Finally, with the installation of the Taliban regime in Afghanistan, it was ordered to ban TikTok because of immoral material that deceives the new generations[374].

[368] Milmo, D. (2022). TikTok users in Russia can see only old Russian-made content. The Guardian.
[369] Hadero, H. (2024). TikTok removes Russian state media accounts for 'covert influence operations' ahead of US election. AP News.
[370] IPRI (2021). TikTok Ban in Pakistan: Policy in Review. Islamabad Policy Research Institute.
[371] Agence France-Press (2023). Nepal says it will ban TikTok, citing effect on 'social harmony'. The Guardian.
[372] Reuters (2024). Nepal lifts TikTok ban after app addresses cyber crime concerns.
[373] Putz, C. (2024). TikTok's Rocky Road in Central Asia. The Diplomat.
[374] BBC (2022). Afghanistan: Taliban orders TikTok, PUBG ban for 'misleading' youths.

A different situation is for those Asian countries that have tense relations with China and close ties with US, beyond India, such as Taiwan and Japan. Taiwan had already banned the app on government devices for national security reasons[375] and Chinese geopolitical propaganda[376] in 2022. In Japan, too, it is banned on government devices, but in 2023 some legislators proposed to ban some apps, including TikTok, if used to spread disinformation[377].

4.1.5 Africa

TikTok has also been a major success in the African region, becoming the most popular digital platform after Facebook[378]. The phenomenon is clearly favoured by the economic relations that exist between China and African countries, but the popularity of the app has not stopped international controversies. Unlike other regions of the world, where TikTok's threat lies in fears about its security, African governments tend to worry more about inappropriate and destabilizing content. In some countries, such as Somalia and Senegal, TikTok has been completely banned, while there is a chance that other countries on the continent will follow their example. However, behind these measures lies a broader justification, namely the control of internal dissent.

In August 2023, the former Somali Minister of Communications and Technology, Jama Hassan Khalif, banned the app for moral and security reasons, as terrorist and immoral groups used it to spread disinformation[379]. Meanwhile, a year later than Somalia, Senegal also blocked access to TikTok following protests that arose after the arrest of Ousmane Sonko[380]. The TikTok ban, combined with the country's Internet restrictions, was supported by the Senegalese Minister of Communications, as it spread hate messages that could destabilize the country's internal stability[381]. Here too, the reasons are to be found in internal motivations.

In Kenya, a petition has also been launched to block TikTok due to its offensive content that threatens the country's values and other countries, such as Egypt and Uganda, are making calls for restrictions. In this context, some experts predict that the recent US temporary ban may have provided a justification for African states to restrict TikTok for political reasons and to control dissent, raising risks to rights and digital innovation[382].

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[375] Taylor, A. et al. (2025). Where is TikTok banned? These countries restrict the app. The Washington Post.
[376] Tobin, M. & Chien, A. C. (2024). Taiwan, on China's Doorstep, Is Dealing With TikTok Its Own Way. The New York Times.
[377] Takenaka, K. & Uranaka, M. (2023). Japan lawmakers eye ban on TikTok, others if used improperly. Reuters.
[378] Adika, N. (2023). Social Media Usage Trends in Africa: GeoPoll Report. GeoPoll.
[379] Caato, B. M. (2023). Outcry in Somalia over government decision to ban TikTok, Telegram. Aljazeera.
[380] Business & Human Rights Resource Centre (2024). Senegal: authorities suspend TikTok app.
[381] Dione, N. & Kouam J. (2023). Senegal blocks TikTok in widening clampdown on dissent. Reuters.
[382] Clynch, H. (2024). US TikTok ban "could embolden African governments". African Business.

4.2 Insights from Comparisons and Data Interpretation

In the previous sub-chapter, some of the most relevant cases of TikTok regulation in today's global scenario were analysed, highlighting how countries have addressed the TikTok issue according to their own geopolitical priorities, economic, cultural and security. To grasp all the nuances of this phenomenon, it is necessary to broaden our view to wider quantitative data and therefore it will be useful to refer to the study by Le (2024), which has collected and synthesized the study carried out on a sample of 38 countries. Through the analysis it will therefore be easier to capture details on threat perceptions and the consequent measures taken, exploring exhaustively the role of geopolitics and data protection in government decisions, as well as analysing how TikTok has effectively become a geopolitical tool that influences internal narratives and international strategies.

In order to achieve these results, the sub-chapter will be structured in three sections. In the first we will explore how geopolitical influence, international alliances and strategies have actually played a role in determining recurring patterns in answering the TikTok question. Instead, the second part will explore the findings in terms of countries' justifications for restrictions, identifying the main reasons for regulating the app. Finally, we will try to understand if TikTok can be used as a geopolitical tool, highlighting recurring patterns or political contradictions, with a focus on the differences between countries aligned and non-aligned to the West, democracies and authoritarian countries.

4.2.1   Geopolitical Influences Shaping TikTok Regulations

The analysis in the previous chapter highlights government decisions which are often clearly aligned with the geopolitical context in which they are placed. The data collected by Le (2024) research work confirms this theory, especially with regard to the influence of US policy towards its allies' government choices on the management of the Chinese platform, while other countries have adopted different strategies based on their own domestic needs. To fully understand the issue of TikTok, it is important to remember that its rise as a global phenomenon has posed unprecedented challenges to the world scenario, especially for those Western powers who felt threatened by a short video app as a potential means of foreign geopolitical influence. The various regulations of TikTok must therefore be evaluated as real levers to counterbalance the power dynamics in cyberspace.

One of the most significant results from the previous sub-chapter, and more apparent at first glance, is the strong link between the decisions of countries aligned with the West.

Specifically, between US policy and the measures taken by its allies. As also revealed by the study of Le (2024), among the 38 countries analysed, 18 are allied with the US and 14 have adopted TikTok restrictions very similar to those of the US. This is quite evident, considering that governments such as France and Canada have explicitly stated that they have followed the footsteps of their international partners, while New Zealand has justified the measure following consultations at international level[383]. Similarly, countries such as Italy, the Netherlands, Belgium and Norway have also explicitly emphasised in their official statements the concerns related to the relationship between TikTok and the Chinese government as a threat to state security, previously raised by the US[384]. Even more emblematic are the cases of the UK, Australia, Canada and New Zealand, as a very deep alignment with the US allies has emerged. With their strategic alliances AUKUS and Five Eyes, the countries have adopted very close measures, justifying their actions by the protection of national security from foreign influence. Although the Canadian case seems to have taken the more cautious position, it has nevertheless followed the American model culminating with the closure of TikTok's activities on the territory in 2024 and discouraging users from accessing the app[385]. The hypothesis of a strategic alignment against China is strongly supported also by the Western media, who claim "If the Chinese-owned TikTok is deemed definitively by the US to be a national security threat, it is hard to see how the UK or other western countries could conclude differently"[386].

Unlike the US experience, the European Union seems to implement a more autonomous regulation. The EU has adopted an approach independent of the American model, as it does not just tackle Chinese influence in virtual space, but regulates access by large platforms to the European market. Indeed, through legal instruments such as the DSA and the GDPR, the European Institutions have focused more on the protection of users' data and the protection of their rights[387]. The reader might now object, as the EU has also banned the app on employees' devices. However, the justification behind it was less politicised and more technical, though criticized. The objective that transpires is a battle to the dominance of large technology companies, especially US, as demonstrated by the recent Antitrust fines imposed

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[383] Le, Y. (2024). National Threats and Responses Toward Digital Social Media: The Case of Global TikTok Regulations. Information and Internet Policy.
[384] Le, Y. (2024). National Threats and Responses Toward Digital Social Media: The Case of Global TikTok Regulations. Information and Internet Policy.
[385] Le, Y. (2024). National Threats and Responses Toward Digital Social Media: The Case of Global TikTok Regulations. Information and Internet Policy.
[386] Sabbagh, D. (2025). Is TikTok a national security threat – or is the ban a smokescreen for superpower rivalry? The Guardian.
[387] Le, Y. (2024). National Threats and Responses Toward Digital Social Media: The Case of Global TikTok Regulations. Information and Internet Policy.

on realities such as Meta[388], Apple[389] and Google[390]. The technical approach is also reflected in the Romanian case, which managed TikTok's regulation with a view to protecting democracy and electoral transparency through stricter measures, but avoiding the rhetoric of the Chinese threat. However, this case highlights a further element of the issue: TikTok is not only perceived as a means of Chinese influence, but can also be exploited as a vector of political propaganda coming from other geopolitical actors, such as in this case Russia.

While the West seems to be largely aligned geopolitically against TikTok, in Asia and Africa the situation is more fragmented and influenced by internal factors such as economic and political instability. For example, Russia, while being a close ally of China, has shown an ambivalent approach to the app. In fact, on the one hand it allowed the use of the social platform, on the other hand, during a complex period such as the conflict in Ukraine, it imposed heavy restrictions to avoid uploading videos during the invasion, highlighting that although good relations with China, Russia perceives TikTok as a potential internal threat, considering the political context. As for Pakistan and Nepal, even these strong economic ties with the Asian power, they also had strong concerns about TikTok, but not focused on geopolitical influence, but on domestic issues and morality. Both countries temporarily banned the app because it was against internal values, and then lifted the ban immediately after adopting stricter measures to moderate content. The case of Africa, a continent renowned for being the recipient of many Chinese investments and economic projects, also shows that the ban of the app was used mainly to contain internal instability due to social protests. Emblematic, in fact, is the case of Senegal which blocked the app following the dissent that arose from the arrest of the opponent Sonko, in an attempt to limit the popular mobilization. However, the case of Somalia and Senegal seems to be in contradiction with the hypothesis that countries aligned with China are more inclined to keep TikTok active on the territory and impose lighter restrictions, since in these two cases the ban is still active. But there is more to consider.

4.2.2 Key Concerns in TikTok Regulations

The analysis of global regulations implemented towards TikTok has highlighted several justifications and it is clear that often even the most technical reasons intersect with

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[388] European Commission (2024). Commission fines Meta €797.72 million over abusive practices benefitting Facebook Marketplace.

[389] European Commission (2024). Commission fines Apple over €1.8 billion over abusive App store rules for music streaming providers.

[390] European Union External Action (2019). Antitrust: Commission fines Google €1.49 billion for abusive practices in online advertising.

broad geopolitical dynamics. National concerns vary depending on the context of the countries involved, but there are recurring patterns in how countries approach TikTok.

As mentioned, the main concern raised by states against TikTok is that it is a threat to data security and that TikTok represents a threat as the CCP's means of accessing data, not only from users but also from the government of a given territory. We have seen that this is the rhetoric most developed by countries allied with the US. Indeed, of the 38 countries analysed by Le (2024), 17 consider the app a security threat through data and 16 have banned its installation on government devices to prevent China from having access to sensitive data. Some of them, in fact, implemented such measures, stating that there had been coordination with allied states or that the decision had been taken at an international level. Other cases have instead explicitly expressed the fear of foreign interference attributing it to the Chinese government, emphasizing a clear US influence in the regulations of the allies.[391]

In addition to national security, some states have emphasized the protection of users' privacy and personal data as the main reason for restrictions[392]. This is the case for 7 out of 38 countries, namely the US, Ireland, Great Britain, the Netherlands, Vietnam, Turkey and France, which have adopted measures to regulate privacy on TikTok, including imposing economic sanctions. For example, the French authorities have forced TikTok to join the Clover project, so that the data would be managed within the European region, as explained in chapter two. This approach reflects an increasing awareness of the risk of data collection and archiving by digital platforms. Plus, the study shows that in countries where TikTok is seen as a threat to privacy and personal data, it is more likely that these governments will have regulations on the subject. According to Le (2024), the statistical correlation between perceived privacy threats and actual implementation of measures is high.

A third, but obvious, concern that drives to regulate the app is instead about the content itself[393]. For some countries, the greatest concern is the publication of content that may be considered immoral and destabilising in relation to the cultural or religious context of the country. This type of threat has been perceived mainly in countries with internal instability or characterized by a rigid moral. For example, governments banned the app because of content that threatened harmony and family structures, or the ban was generated by content that could increase popular dissent against the central government. In many cases, however, it seems that

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[391] Le, Y. (2024). National Threats and Responses Toward Digital Social Media: The Case of Global TikTok Regulations. Information and Internet Policy.

[392] Le, Y. (2024). National Threats and Responses Toward Digital Social Media: The Case of Global TikTok Regulations. Information and Internet Policy.

[393] Le, Y. (2024). National Threats and Responses Toward Digital Social Media: The Case of Global TikTok Regulations. Information and Internet Policy.

the ban of TikTok was implicitly justified by the need to maintain control over the digital activities of the territory[394].

4.2.3 Is TikTok a Geopolitical Instrument? Dominant Patterns and Contradictions

The picture is now clear: TikTok is not just a short video entertainment app and viral ballets. It has become, in all intents and purposes, a key instrument and actor in today's digital geopolitics. But can this vision be said to be universal? Despite the growing restrictions at a global level, these limitations do not represent a loss of power for TikTok, but rather demonstrate the increasing need on the part of states to strengthen their digital sovereignty and also the geopolitical weight of the platform. There are regions and contexts in the world that see TikTok as a geopolitical tool, but if some countries see it as a means to counter Chinese power, others see it as a way to increase the political control of the government over the territory. The perception of TikTok is different, but the use of the Chinese platform as a geopolitical tool remains dominant.

Some examples are undeniable, as they see TikTok as an instrument to balance international, rather than domestic, equilibriums. The US, with its allies, perceive the platform as a strategic threat due to its Chinese origin. It's a modest but profitable rhetoric: a Chinese company has access to sensitive data and, according to the allegations, can transmit it to the central government, sharing not only sensitive user data, but also information of national relevance. The narrative has then modelled all those measures, characteristics of the Western countries united by alliances and converging multilateral priorities, which have banned the app on government devices or other restrictions. Exploring deeply, the issue goes beyond national security and TikTok becomes a pawn in the digital game. In a digital market, strongly dominated by the US, the fear that emerges is not only related to data but also to cultural influence. Through its suggestible algorithm and a hypothesis of partiality, TikTok seems to be a Chinese weapon of propaganda and soft power, symbol of a new global technological order in which digital control is vital.

However, it seems that this hypothesis may be in contradiction with what has been said so far if we think of those countries that are not involved in a technological war with China, but rather have partnerships in common. In emblematic cases such as Pakistan and Russia, aligned with the Chinese country, TikTok has been a problem. But not for accusations of espionage, but for a promotion of immoral content and that incite political dissent. At first

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[394] Azadi, R. R. (2022). Taliban bans TikTok, popular video game in Afghanistan. RadioFreeEurope/RadioLiberty.

glance, the Asian and African cases seem to disprove the idea that TikTok can be a geopolitical tool. However, a closer look reveals another issue: control. It is not about controlling the growing power of China, but about internal control and public opinion. Although the reasons are different, the heart is the same. TikTok is a geopolitical tool, because aligned governments, faced with a platform that promotes free and decentralized communication, fear losing control of public narratives.

In summary, does this show that TikTok is a geopolitical tool? Yes, but it should be remembered that TikTok is a recent and extremely complex issue: the app takes different meanings depending on the political, economic and cultural context in which it is inserted and it would be wrong to assume such certainty in geopolitical dynamics. It is true, however, that we can assume as true certain trends of the states, for example that in the Western countries TikTok is the symbol of a historical rivalry between power blocks and therefore the restrictions to TikTok serve to balance the Chinese power, not by chance today we talk about "new cold war"[395]. With regards to countries with strong internal instability, on the contrary, the digital platform is a means to preserve domestic order, while in emerging economies it is an economic resource that must be negotiated carefully. Therefore, what has been said does not discredit the hypothesis that TikTok is a geopolitical tool, but rather confirms it. This shows, at a global level, that digital platforms cannot be separated from geopolitical dynamics. Even where TikTok's regulations have internal justifications, the need for information control highlights how digital platforms, such as TikTok, are essential in maintaining power, both domestically and internationally. This supports that digital platforms are part of power strategies, since they can influence what we see, believe and share, representing the heart of the nowadays digital geopolitics.

4.3 Broader Implications and Prospects

The reported analysis of regulations and the responses from countries around the world to the issue of TikTok have highlighted how complex the phenomenon can be, despite its apparent simplicity. TikTok has proven to be a platform for reshaping not only geopolitical dynamics, but also the concept of digital sovereignty, security policies and national data strategies. For this reason, in this concluding sub-chapter we will not only analyse the broader implications of this regulatory race but also the future directions that digital platforms, such as TikTok, will take in an increasingly complex digital environment.

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[395] Brands, H. & Gaddis, J. L. (2021). The New Cold War: America, China, and the Echoes of History. Foreign Affairs.

To achieve this ambitious goal, this concluding and prospective subchapter will be divided as follows. Following the analysis provided above, the first section will look at the short-term implications of the growing geopolitical competition between technological powers, with a focus on the economic and political consequences in the race for technological supremacy. The immediate repercussions of restrictions such as the exclusion of TikTok from markets and the consequences for business models related to digital platforms will be highlighted. The second section, on the other hand, will delve into the long-term implications, including the concept of digital sovereignty in a broader sense and the risks it entails in today's scenario. Trends towards digital nationalism and the resulting digital balkanisation will be the focus of the analysis. These reflections serve to paint a clear picture of the current technological and geopolitical context, but also to lay the groundwork for a deeper understanding of the dynamics that influence digital control of platforms internationally. By navigating the broader implications of the restrictions on TikTok, the emerging trends not only define the present, but also the future of the global technology ecosystem. In this way, the chapter does not limit itself to interpreting the TikTok phenomenon as an isolated case, but situates it in a trajectory of digital and geopolitical transformations, which will be better illustrated in the conclusions.

4.3.1 Short-Term Implications

The dynamics analysed so far highlight the intensification of a "new cold war"[396], characterised by competition between the major technological powers. This scenario is generating a strong economic and political impact, reflected in a battle for digital supremacy in which states are investing heavily in the development and protection of their digital infrastructures. What does this mean? Certainly, in this scenario, the United States and China are at the centre of the rivalry. Both, flanked by their allies, seek to dominate the key sectors of this century, such as robotics, artificial intelligence and 5G. The most emblematic cases are in fact the rise of DeepSeek[397], the Chinese AI answer to the US ChatGPT, and security and espionage fears attributed to the Chinese company Huawei through 5G[398]. The main objective of investment is to ensure technological independence from other global players and provide greater control over data and networks, leading countries around the world to redefine their digital regulations. The incorporation of digital platforms into global markets has made these tools vital for economic growth, but restrictive actions such as the TikTok ban pose a threat to

[396] Brands, H. & Gaddis, J. L. (2021). The New Cold War: America, China, and the Echoes of History. Foreign Affairs.
[397] Ng, K. Et al. (2025). DeepSeek: The Chinese AI app that has the world talking. BBC.
[398] Berman, N. et al. (2023). Is China's Huawei a Threat to U.S. National Security? Council on Foreign Relations.

trade dynamics today. Specifically, a hypothetical ban of TikTok in the US, as seen in the Indian case, could lead to a drop in user engagement, repercussions for content creators and consequences for companies that invest in the app with advertising and marketing revenue. The restrictions do not just affect a few entities, but have implications for the entire digital ecosystem. Suspending or banning TikTok would undermine entire business models of companies and individuals that have built an economic reality on the platform, posing a danger to increasingly digital-related industries. Any regulatory intervention on these platforms highlights their strategic role as trade and communication flows for companies, individuals and institutions, increasing the risk of digital market fragmentation.[399]

At the same time, the presence of governments in the regulation of digital platforms also marks a strong shift in the distribution of political power, whereby states do not simply implement domestic policies but actual international rules for technological governance. As we have seen, some countries tend to adopt restrictive measures to safeguard national security, while others exploit censorship and control of digital activities. TikTok's global bans highlight precisely this: the relevance of digital policy as a means of managing international technological influence, where each regulatory decision becomes an explicit political statement reflecting geopolitical strategies against digital threats.[400]

4.3.2 Long-Term Implications

Thus, the decisions of today's governments shape the fate of tomorrow's technology. In the context outlined, the need for nations to be present in the digital marketplace while protecting themselves from technological threats is increasing. Consequently, it is evident that the concept of digital sovereignty, understood as the willingness and need of states to protect and promote their virtual space, will not tend to disappear but rather become increasingly consolidated. What has emerged from the Indian case study and comparison of global responses to TikTok is a trend towards so-called digital nationalism, a mechanism in which countries assert their control over their own technological infrastructures, limiting access to external actors. But in addition to market fragmentation, as explained earlier, there is a clear risk that the desire to protect domestic data and reduce foreign dependence may lead to a

[399] Johnston, E. (2024). From App to Allegory: The TikTok Ban as a Symbol of Deeper Geopolitical Tensions. Stanford International Policy Review.
[400] Johnston, E. (2024). From App to Allegory: The TikTok Ban as a Symbol of Deeper Geopolitical Tensions. Stanford International Policy Review.

fragmentation of the Internet, also known as "splinternet"[401] or "digital balkanization"[402]. That is, the adoption of separate national regulations and the absence of common global standards could lead to the fragmentation of the global network into isolated ecosystems with regulatory barriers acting as virtual borders[403]. Fragmentation and different Internet access between countries undermines the very principle of cyberspace, which was born with the desire for openness and connection.

Furthermore, the desire of states to impose their own digital sovereignty could cause over-regulation that would lead to the eventual restriction of digital innovation, freedom of expression, but also discourage technology companies from investing in territories where strict and numerous policies apply to platforms. An example of this dynamic is described by a Financial Times article showing how the EU, through the application of numerous stringent regulations for large technology companies, has disadvantaged the digital context. In the interview, Member of the European Parliament Aura Salla recommends stopping the introduction of new regulations and better assessing the impact of existing ones on the European digital landscape[404]. In parallel, there is a growing trend towards protectionist trade policies, in which countries increase their control over international technology transactions. In this sense, digital protectionism results in reduced technology exports and imports and increased control over foreign digital investment, undermining global supply chains and trade agreements.[405]

Conclusion of Chapter 4

The chapter's comparative analysis of the global responses and regulations that attempted to answer the question of TikTok provided interesting results for the thesis. In fact, starting with the Indian case of 2020, it emerged that this has acquired an important role as a model that can be replicated by other nations around the world and that has highlighted the strategic importance of digital platforms for states. In particular, TikTok became an influential vehicle in security measures, soft power and international narratives, confirming the hypothesis of a geopolitical tool elaborated at the beginning.

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[401] Su, C., & Tang, W. (2023). Data sovereignty and platform neutrality – A comparative study on TikTok's data policy, Global Media and China.

[402] Johnston, E. (2024). From App to Allegory: The TikTok Ban as a Symbol of Deeper Geopolitical Tensions. Stanford International Policy Review.

[403] Johnston, E. (2024). From App to Allegory: The TikTok Ban as a Symbol of Deeper Geopolitical Tensions. Stanford International Policy Review.

[404] Tech Tonic (2025). Transcript: Tech in 2025 — The EU vs Big Tech. Financial Times.

[405] Johnston, E. (2024). From App to Allegory: The TikTok Ban as a Symbol of Deeper Geopolitical Tensions. Stanford International Policy Review.

Starting with the first subchapter, the aim was to highlight how government decisions have followed a common geopolitical line depending on each country's context, as also demonstrated in the Indian case thanks to its alignment with the US. On the part of the United States and its allies, measures to counter the risk to national security have been characterised by bans and severe restrictions, while the European Union, although influenced, has adopted a more regulatory approach aimed at protecting users' fundamental rights. By contrast, outside the Western alliances, in contexts such as Asia and Africa, albeit ambivalent, the responses to TikTok were more pragmatic linked to the intrinsic need for internal control. This underlines how TikTok is perceived as an external threat mainly by Western countries, since they are bound by alliances with the Chinese rival, while in other regions of the world TikTok is an internal threat and at the same time an economic and technological resource to be regulated.

Through the analysis of recurring patterns, the second sub-chapter provided a further study element relevant to the thesis. In particular, there are three main categories of risk related to the app. In contexts bound by Western alliances and partnerships, the main concern is related to national security and the possibility that TikTok could be used by the Chinese government to access government data. A more data-centric focus has been noted by the European Union, which focuses on algorithm transparency and personal data protection. While in countries with non-democratic regimes, or where there is more social control, the real concern related to TikTok rested on moderation and publication of content contrary to the country's values. As a result, government measures vary according to national contexts and priorities, but digital sovereignty seems to emerge as a common goal, with possible declinations.

Finally, the last sub-chapter sought to explore the future of TikTok and other digital platforms, focusing the reader's attention on the implications that global regulations on the Chinese platform might have in the short and long term. Keeping in mind what has been analysed, implications highlighted how the increasing competition between superpowers is reshaping the balance between innovation, governance and security, as well as redefining the very concept of digital sovereignty. Illustrating the consequences in the short term, a significant economic and political impact emerged mainly due to the competition between the two great powers, namely the United States and China. While, in the long term, the strengthening of digital sovereignty is generating a strong tendency of states towards digital nationalism and, although this dynamic may lead towards greater autonomy, a future of fragmentation and isolated ecosystems is envisaged. These trends seem to foresee a future scenario in which digital platforms remain the protagonists but are increasingly challenged by a complex regulatory framework.

To conclude, this fourth chapter showed how TikTok has indeed become a relevant tool in the geopolitical landscape in recent years, reshaping national strategies, soft power and the concept of digital sovereignty. Consequently, this chapter is extremely relevant because it answers the initial research question: can TikTok be considered an effective geopolitical tool? The answer is yes, but not only. One can venture to call TikTok not only an instrument, but also a non-state geopolitical actor. Here are some basic considerations that lead to this conclusion. First, it should be said that the term "non-state actors"[406] refers to all those participants in international dynamics who are not states, including individuals and entities at global, regional, sub-regional and local levels[407]. The title is extremely broad and includes all those actors who have their own plans and characteristics, but are shaped and deal with other actors, often state[408]. TikTok is a non-state actor for two main reasons. First, the platform has shown a significant autonomy from the alleged association with the Chinese company ByteDance and the CCP. Despite being the focus of international discussions related to its security, TikTok has independently adopted strategies adapted to the regulations of different global markets. Significant examples are the Project Texas in the US and the Project Clover in the European area, through which the Chinese platform has agreed to transfer user data into local services and work with government authorities to address data protection and privacy concerns. This shows that TikTok is not only a simple geopolitical tool, but also an entity capable of dialogue and negotiation with other actors in the international arena. TikTok is not limited to regulatory demands, but actively participates in governance processes, entering into agreements and collaborating with authorities and institutions. Secondly, TikTok is an autonomous actor in the geopolitical scenario because it is able to shape public narratives and international opinions through its algorithm. The algorithm is set to select and promote certain content according to personalized criteria, proving not only a passive tool used by states to make propaganda, but acts as moderator and creator of ideas and perceptions. Precisely because of its ability to influence public opinion, states like the US fear the alteration of information flows on an international scale. These two characteristics mentioned, autonomy of negotiation and ability to shape public debates, show that TikTok is not only a passive geopolitical instrument, but a crucial actor within the increasingly complex geopolitical scenario. This role, finally, seems destined to become more and more consolidated in the future, with the ever-deeper entanglement between digital platforms and geopolitical dynamics.

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[406] Wagner, M. (2013). Non-State Actors. Oxford Public International Law.
[407] Wagner, M. (2013). Non-State Actors. Oxford Public International Law.
[408] Johnson, B. (2023). The rise of non-state actors: TikTok, national security, and mental health. International Studies, Utah State University.

CONCLUSION

The thesis aimed to analyse in depth the interaction between digital sovereignty, social platforms and geopolitical dynamics that affect the international scenario today, using the Indian government's 2020 TikTok ban as a case study reference. Through a theoretical, historical and comparative in-depth study, the thesis aimed to demonstrate how TikTok is not only a geopolitical instrument used in power dynamics between states, but also a non-state actor in international relations, capable of influencing global regulation, narratives and relationships. Specifically, the research question of the thesis focused on the symbolic meaning of the TikTok ban and how this can go beyond mere data security, becoming a governmental action of affirmation of its own digital sovereignty in the fight against growing Chinese influence and soft power. The results obtained from the analysis of the Indian case seem to confirm this hypothesis and the successive comparisons between areas of the world deepen its geopolitical significance. There have been several instances of official reasons on the part of states for data protection and privacy, but also deeper strategies for geopolitical alignment and consolidation of national identity.

Among the major findings of the thesis is the emergence of the concept of digital sovereignty as a renewed priority for states confronting each other in cyberspace, but also as a claim of the users themselves[409]. The global success of social platforms, such as TikTok, has raised questions around the world about data control and foreign influence on domestic debates. This has created an urgency for states to strategically control their data and digital infrastructure as much as their physical borders. In this perspective, the Indian case represented a true historical event that showed how a geopolitical event, the Galwan Valley clash, was translated into an action of technological control by a government measure. The ban of TikTok by the Indian government was motivated by security, data protection and privacy issues but, by carefully analysing the official statements and media narratives, a more symbolic meaning became evident. A security measure? More. An act of technological resistance, after years of rivalry, against Chinese digital influence and a strategic stance to strengthen close ties with its allies, including the United States. Therefore, the Indian case of 2020 has initiated a new phase in international relations in which geopolitics and digital can no longer be separated. The Indian ban has explicitly demonstrated for the first time that digital platforms can no longer be approached as mere entertainment or commercial services, but regulated as virtual arenas of strategic competition between states where they fight for control of data and information. In this case study, another significant aspect emerged, namely the role of media narratives in legitimising government measures.

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[409] Kumar, A., & Thussu, D. (2023). Media, digital sovereignty and geopolitics: The case of the TikTok ban in India, Media, Culture & Society.

Specifically, through the analysis of the major Indian media channels during the period of the ban, a strong patriotic rhetoric focused on the image of a "digital surgical strike"[410] was highlighted, which turned the ban into a symbol of digital self-determination against China and "digital colonialism"[411], once again confirming the symbolic value of the act. As we have seen, although the ban has stimulated technological innovation in the country, in reality the regulatory frameworks are still underdeveloped and emerging apps have failed to fully replace TikTok. Moreover, users and companies have fragmented into different digital options, forcing creators to start their audiences from scratch and bringing a discontent that the media had not reported.

The hypothesis that TikTok is used by states as a geopolitical tool, however, does not stop with the Indian case. In fact, the global comparison has revealed that India has not been an exception, but rather a replicable model. TikTok is a global issue. In the United States, the app has been at the centre of heated debates for years now and is subject to restrictions similar to the Indian case, while in the European Union, the approach is more technical and regulatory, with data protection being the priority. At the same time, in countries like Russia, Pakistan and Senegal, control over TikTok is linked to the need to maintain internal stability by moderating content deemed inappropriate and subversive. Three main patterns of regulation emerged from the analysis: Western countries, aligned with China's rival par excellence, the United States, perceive TikTok as a threat to national security and a growing Chinese economic presence that needs to be limited with regulatory measures; authoritarian regimes, instead, regulate the platform with the aim of controlling political dissent and maintaining control over the public narrative; while emerging countries seem to oscillate between the need to regulate the platform and the desire to exploit its economic advantage with China. However, the phenomenon does not end with the opposition between restriction and freedom. In fact, the most interesting aspect that emerged from the thesis lies in the attempt to answer the research question. In particular, TikTok is not only an instrument for balancing geopolitical relations, but plays a role as a true non-state actor in global affairs. The platform has demonstrated an ability to negotiate and adapt with the regulatory demands of states and its autonomous ability to shape public opinion is evident. This shows that digital platforms are not passive actors, but entities that redefine power dynamics in the geopolitical space.

The analysis answers some questions, but not all. During the thesis, the reader might ask: and now, what is next? After all the implications for the future, the question arises: will TikTok disappear? It is clear that TikTok and other digital platforms have gained, and will continue to obtain, great

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[410] Kumar, A. (2023). State nationalism or popular nationalism? Analysing media coverage of TikTok ban on mainstream Indian TV news channels. Media Asia.
[411] Couldry, N., Mejias, U. A. (2018). Data Colonialism: Rethinking Big Data's Relation to the Contemporary Subject. Television & New Media.

strategic weight both economically and culturally, but also in the geopolitical scenario. Looking to the future, despite debates and concerns of various kinds, it is more likely that platforms will become increasingly relevant rather than disappear from one day to the next. Indeed, projections for the future indicate growth even after 2025. According to TikTok's report "What's Next 2025"[412], TikTok will in fact be increasingly central to digital communication through collaborative projects, inclusive content and creative innovation based on generative AI[413]. However, growth forecasts for TikTok and its evolution in the digital landscape are increasingly correlated with the very evolution of global regulatory frameworks and geopolitical dynamics between countries. The fate of TikTok, and other digital platforms, will not only be determined by their ability to innovate but, now more than ever, by their ability to adapt to regulatory demands and fragile international balances. It is in this context that two possible scenarios for digital platforms are emerging within the digital geopolitical landscape: greater regulatory harmonisation or regional fragmentation[414]. In the first, and more optimistic scenario, the major technological powers would work together to find new common standards to regulate critical areas, such as information security, AI and privacy. Multilateral cooperation would result in a uniform global alignment to operate even in different markets, avoiding regulatory closures or conflicts and bypassing additional regulatory compliance costs[415]. In addition, large-scale cooperation would bring several benefits, for example the promotion of innovation as companies would invest more confidently in more markets, or platforms would be able to expand internationally and compete in different markets thanks to more homogenous rules. This would also lead to technological collaboration between various market realities encouraging the development of new technologies. It is clear, however, that although this is the most prosperous scenario, it is also the most utopian, as this idea of active collaboration requires a political effort that is difficult to achieve as countries often have divergent interests and ambitions that are unattainable in a geopolitical competition. The second scenario, on the other hand, seems the more realistic one because it aligns closely with the approaches implemented by countries in recent times. In this forecast, data and privacy regulations continue to diverge among the world's major powers and regions. Each economic bloc continues to develop regulations tailored to its own interests, international ambitions and local priorities, such as data protection and control over digital activities[416]. As mentioned above, the future ahead for TikTok and other platforms is characterised by regionalised ecosystems, where they will

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[412] TikTok (2025). What's Next Report 2025 - Brand e Community Insieme su TikTok: Le Tendenze del 2025. NewsRoom.
[413] TikTok (2025). What's Next Report 2025 - Brand e Community Insieme su TikTok: Le Tendenze del 2025. NewsRoom.
[414] Schettini, C. (2025). Big Tech e governi alla prova della verità. ISPI.
[415] Schettini, C. (2025). Big Tech e governi alla prova della verità. ISPI.
[416] Schettini, C. (2025). Big Tech e governi alla prova della verità. ISPI.

have to comply with divergent policies depending on the market in which they operate, slowing down their expansion and related business models. Moreover, this would certainly be a brake on innovation, as investment would be discouraged by compliance costs, legal complexities and digital isolation due to the absence of common standards and international cooperation. In any case, it is undeniable that digital platforms will retain a crucial position in the 21st century, but their future will depend on their ability to strike a balance between regulation and innovation. Balancing public-private collaboration will become crucial for Big Tech, platforms and governments, as they will need to define clear regulations that allow for legal compliance while promoting technological development[417]. In a digital present, and even more in a digital future, it will be essential to be able to collaborate between the various entities in the international digital landscape.

Regardless of the scenario that unfolds, it is certain that the topics of the evolution of digital sovereignty and the regulation of platforms will remain at the centre of the international geopolitical debate. However, the nature of the issue will continue to be dynamic and unpredictable: technological innovations, geopolitical events and new regulations could alter the balances of international relations, leading to situations that are difficult to predict. The trend of states towards digital sovereignty, the growing sensitivity about data security and the influence of digital platforms in international contexts suggests a debate that is bound to grow, with effects that will go far beyond the case of TikTok. And it is precisely because of the extreme current relevance and scarcity of literature on the subject that I will continue to follow the developments of the TikTok phenomenon and the derivations it may take, with the awareness that the confrontation between geopolitics and digital platforms has only just begun.

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