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„The NSA Scandal and the Battle over Privacy:

Framing analysis of privacy discourse in print media
during, before and after Snowden revelations“

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Abstract

The massive growth of online communication platforms in recent years as well as the growing surveillance threat from security agencies have brought with them increasing privacy concerns. Today media plays an important role in driving the discussion of privacy rights and citizens' concerns. Rarely do long periods of time pass without a major privacy issue being brought to light. This paper, guided by frame theory of Robert Entman (1993), presents the results of a quantitative study of media discourse, developed during three periods of time, for three different western countries - Germany, US and Britain. In order to investigate the central organizing ideas, intergrated in the media coverage about privacy, this study explored 900 articles published in six of the most elite national newspapers – New York Times, Washington Post, Guardian, Daily Telegraph, Sueddeutsche Zeitung and Die Welt. Findings reveal that the articles reflect current events connected to privacy like new regulations for data protection or political scandals. Privacy debate evolved throughout the years from discussions centered around technology, legislation and national security to a more critical surveillance discourse. 2013 experienced a great increase in surveillance reporting, which influenced the newspapers' coverage in 2014. Although media discourse was again marked by signs of security and technology, surveillance has become an important part of the privacy discourse, provided by the newspapers.

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Introduction

Privacy (from Latin: “privatus” - separated from the rest) indicates a state in which one is not observed or disturbed by other people and is being free from public attention (Oxford Dictionary).

Humans have always had a need for privacy. The issue of privacy was already present in the writings of Socrates. He made a distinction between the *outer* and the *inner*, between public and private, society and solitude (Sarikakis & Tsapogas, 2013). With the advent of social media, however the boundaries between public and private information, have been blurred considerably. In the dilemma of how much privacy we need, media plays a central role, because it presents a public arena, where all the information and discussions of multiple claims are made available for the citizens (Dinev, 2014).

Coverage of privacy is a main driver for privacy design (Rizk et.al, 2009) and media plays an important role in driving the discussion about privacy issues. Recently due to the conjunction of three processes that have become interwoven: trans-nationalization, digitization, and privatization (Bauman, Bigo, Esteves, Guild, Jabri, Lyon, & Walker, 2014), this topic has risen into public discourse with discussions about SNS privacy policy and intellectual property rights and ‘Passenger Name Records’. Even though mainstream media paid attention to privacy topics in the past, there were also issues like sharing of user’s IPs with advertisers, as well as the use of Face-recognition-software, which did not gain enough traction (Rizk et.al, 2009).

The revelations on 6 June 2013 changed the landscape of media reporting and people’s understanding about privacy dramatically. It became a mayor issue not only for Internet users, but also for whole nations and their leaders. The articles of the British newspaper-Guardian about the secret US program PRISM that monitored the Internet communications of citizens, produced media storms and heightened the tone of political discussions about privacy rights (Dinev, 2014). As usual, a global debate was on. The opinion of world leaders split around the topic. On the one side there was the U.S. camp with President Obama calling the discussion “modest encroachments on privacy” (Dorning & Strohm 2013 in Qin, 2015), whereas Europe considered NSA program as an injustice being carried out by US own government. At the same time Britain, whose newspaper was the mouthpiece of the provocative leaks, was internally divided in

different media outlets representing different opinions (Branum & Black, 2015). Focusing on these three countries - US, Germany and Britain, this research will investigate newspaper's narratives and aims to provide a map of privacy discussion during three periods of time –before, after and during the NSA scandal.

These countries are chosen mainly for two reasons. First they were all involved in the scandal, as Germany represents one of US 'closest allies and at the same time a victim of NSA espionage, US is the one responsible for the problem and Britain is internally split having similar policy towards privacy as US and being the one who carried out the truth. Secondly, these western democracies have different understanding and regulations of privacy. Whereas Germany contributed to the development of a highly influential EU model of data protection, US privacy laws were described by security experts as well-intentioned but fundamentally inadequate (Government Computer News, 2007). The role of Britain is worth further exploration, because it lies somewhere in-between as Cameron administration supports NSA program in spying on users and pressured Guardian, because of the Snowden reporting. Thus for this paper it is of inmost importance to draw lines between these actors and to explore how the debate on privacy develops around the political vibrations in the countries.

After the revelations, data protection and privacy policies made some significant strides, however they didn't brought the desired outcome (Sarikakis and Tsapogas, 2013). The problem of privacy rights encouraged a huge debate around EU legislators, media outlets, politicians and citizens in the European countries. Media outlets play a central role in informing citizens and providing them with "models of conversational interactions" that they may adopt to understand and discuss privacy (Fornaciari, 2014). In order to examine this, I will concentrate on six different leading national newspapers: New York Times (NYT) and Washington Post (WP) on the side of US, The Guardian and Daily Telegraph in Britain, and Sueddeutsche Zeitung (SZ) and Die Welt (DW) in Germany, which represent different society groups and political leanings. The selection criteria is based on their high circulation rates nationally and on their political leaning, so that a diversity of political perspectives and topics is assured. WP, Die Welt and Telegraph represent more conservative reporting style, while NYT, The Guardian and SZ are used as an examples of liberal newspapers. Having these leading newspaper groups of three western democracies it is vital to offer a perspective on the formation of privacy discourse in

traditional media. A detailed content and framing analysis of the selected newspapers will help me answer the following question: Which frames shape the privacy discourse before, during and after the NSA scandal and how Snowden revelations influenced media discourse on privacy?

Analysis of media texts, informed by Entman's (1993) concept of framing as a fractured paradigm is an important approach for this study that allows me to examine the complexity of how different media outlets define and discuss privacy? The analysis of framing will provide insight about how privacy issues have been communicated and presented by the media throughout the years and whether there are some overarching reporting patterns in the countries. In order to do this, the study focuses on the elements, building the frames and how they were structured in order to communicate a certain image of privacy. Even though media discourse may contribute for creating a clearer concept of privacy, research has not addressed this aspect for privacy discourse yet.

Crucial aspect for studying how privacy discourse evolved over the past years is the concepts of framing that will be first explained in theory part of the work. Social research, examining privacy debates, framing of privacy and political scandals will serve as a foundation for the investigation of frames. Key questions to be answered are: Which frames shape the privacy discourse before, during and after the NSA scandal? What problems and causes with regard to privacy dominated the coverage? What solutions and courses of action are suggested regarding the situation?. The hypotheses, underlying this study will be constructed in accordance with the results from recent research about the development of privacy discourse over the years and framing the economy of information. The extraction of frames is performed by a cluster analysis based on the framing concept of Entman and the method applied by Matthes & Kohring (2008). The section research methods discusses the design of the study as well as the categories and frame elements, underlying the content analysis. In addition, some insight about hierarchical cluster analysis, used for determining the frames, will be provided. The fourth part then contains the analysis of the results and illustrates the topics and the actors, shaping the discourse. After this, a cluster analysis of the constructed frame elements will group them together systematically in such a way as to form a cluster or pattern that can be found in different articles. The extracted patterns represent the frames. (Kohring & Matthes, 2008). In order to gain information about how each media outlet

constructs its privacy reporting, the frames of all newspapers will be compared for each of the selected periods of time. Finally, the discussion part will bring information about how different information channels and countries structured their privacy discussions, in what light they presented the events and how the debate developed throughout the years.

Theoretical background

Theoretical understanding of privacy

Current state of privacy debate and global policies.

In modern democracies, discussions about privacy have become more and more present partly as a consequence of the technological innovations that made it increasingly easy to share, collect and analyse personal information (Nissenbaum, 2010 in Fornaciari, 2014). This study assumes that public discourse on privacy has also evolved over the last four decades as a consequence of the introduction of social media. They have enriched the possibilities to create ties, to expose our identity and build social capital (Ellison et al., 2007, 2011). Further the tragic event of 9/11 introduced a new context, in which the notions privacy and security were reframed. The relationship between them became a trade-off, where more privacy leads to less security (Chandler, 2009 in Huijboom and G. Bodea, 2015). The attacks in London and Madrid strengthened this perception. The focus stretched, when privacy infringements by Facebook and Google, and the Snowden revelations were brought to light.

Policymakers recognize the importance of regulating privacy and its potential effects for online behaviour. However, the plurality of definitions of privacy is a good indicator of the fluidity of the construct (Epstein, Roth & Baumer, 2014). The way, in which law approaches privacy does not reflect on new trends and its multidimensionality, addressed by privacy debates. In the case of global communication, guidelines were established to deal with new privacy questions, but even collaborative approaches have not brought the desired outcome (Sarikakis & Tsapogas, 2013).

The EU Data Protection Directive has sought to establish international benchmarks for corporate information processing and The Wall Street Journal describes them “increasingly shaping the way businesses operate around the globe.” (Wall Street Journal, 2003). The chief goals of the Directive are to facilitate free flow of personal data in the EU, and to ensure an equally high level of protection within all EU countries (Data Protection Directive, art. 1, at 38). The Directive’s protection also extends outside of the EU - it contains important provisions concerning international data transfers (Schwartz, 2013). Therefore it have been criticized by business giants like Facebook and Google, trying to limit its scope. The regulation's right to be forgotten is also one of the most discussed parts of the EU legislation and it raises many technical and free speech questions. Personal information online can get copied and reposted on multiple websites, which is a challenge for the regulation according to the Centre for Democracy and Technology (IDG News Service, 2012).

While data privacy is regulated in Europe, it is highly legislated in the United States. While in the EU, it is the responsibility of the government to protect citizens’ privacy rights, in the U.S., markets and self-regulation influence information privacy (Movius & Krup, 2009). This understanding contrasts the EU approach to data privacy. On a federal level, the United States maintains a sectorial approach towards data protection where certain industries are covered and others are not. At a state level, most states have enacted some form of privacy legislation (Schwarz, 2013). In 2006, the US Department of Justice established the Chief Privacy and Civil Liberties Office and the Office of Privacy and Civil Liberties, with responsibilities to protect privacy and civil liberties (US Department of Justice). The main policy tools include the Privacy Act of 1997, the privacy provisions of the E-Government Act of 2002 and the Federal Information Security Management Act (US Department of Justice). Security experts, however, have described FISMA as a fundamentally flawed tool, and argued that the compliance and reporting methodology mandated by FISMA measures security planning rather than information security. Agencies routinely collect and disclose information from their records without first obtaining consent from the individuals, whose privacy is impacted (Government Computer News, 2007). Criticism also falls on agencies for not applying consistent criteria for measuring Privacy Act compliance

Both legislative approaches have their shortcomings. In their extremes, the US approach risks a rude awakening of a technological determinism (Polonetsky & Tene, 2013), whereas Europe, with its risk avoidance and regulatory bureaucracy, might slow innovation and development of the technology sector. The problem lies in the difficulty to effectively protect the right to privacy (Sarikakis & Tsapogas, 2013). Questions whether consumers understand privacy policies and whether they make them more informed have also been raised. Critics ask if consumers even read privacy policies or can understand what they read (Out-Law.com, 2008). Although it is a responsibility of politicians to protect business and encourage its future, should this take priority over the public's right to personal privacy?

Current state of privacy debate in social research.

Dinev (2014) notes that despite the scholarly attention and the seemingly simple definitions of privacy over the years, the concept is still surrounded by uncertainty and disagreement. There is still an ongoing debate about the meaning of privacy among scholars. This is also due to the many perspectives that such a definition should address and include like law, marketing, management, economics, political and social sciences. Westin and Solove offer two different approaches for understanding the complex concept of privacy.

Westin's framework is based on a hierarchical model of analysis of privacy. He distinguishes between political, socio-cultural and personal levels as overlapping spaces, where privacy is constructed and practiced (Westin 1967 in Epstein, Roth & Baumer, 2014). He defines information privacy and describes the forces that shape privacy conceptualizations. At a political level privacy definition strongly depends on political ideologies practiced by governmental authorities. Western countries have a strong relationship with individualism and freedom of association; they regard the private sector as the major force for social progress and morality. Westin defines the relation between government's protection mechanism and civil liberty resp. the interfering with the citizen's private life and beliefs as especially problematical situation in western democracies. A central challenge for the contemporary society is to manage the tension between disclosure, privacy and surveillance in such a way that protects democracy and

civility, and reflects changing social values, technologies, and economic conditions (Westin, 2003). The political balance is the foundation for the definition of privacy on the socio-cultural level (Westin 1967 in Westin 2003). At the socio-cultural level, environmental and class factors such as wealth and race define the opportunities of people to protect their “freedom from the observation of others” (Westin, 2003). In this case the right to privacy depends on individual's power and social status. Ironically, the more powerful and famous the actor is, the more assaulted his/her privacy will be. Privacy rights are tied to changes in the norms of a society such as to what kind of personal actions are regarded as positive or harmful for the public good (Westin, 2003). Therefore privacy debates are never ending. Privacy is an arena of democratic practices, which includes the role of the government, the degree of privacy to afford different sectors and the role of privacy claims. At the final individual level, Westin (2003) understands privacy as the claim of a person to determine what information about him/her should be available to others. Westin (2003) points out that the political and socio-cultural boundaries, claims of privacy are made by citizens on a daily basis, as they try to keep the balance between privacy and their need for disclosure and communication. These changing personal needs about self-disclosure make privacy a complex condition, and a matter of personal choice. The importance of the right to choose makes the right to privacy a fundamental part of civil liberty in democratic society (Westin, 2003).

Solove's framework views privacy in a pluralistic, contextual manner and asserts that the discussion about privacy should focus on privacy problems or specific disruptions to privacy evaluated in terms of their importance to society (Epstein, Roth & Baumer, 2014). He criticizes existing frameworks, such as ‘the right to be left alone’ (Warren & Brandeis, 1980) or ‘privacy as control over personal information’, as they try to ‘narrow privacy to one common thread, which cannot include all of the existing privacy problems without being too broad (Solove, 2002). His goal is to translate the implicit understandings of privacy by practitioners into explicit. Solove (2002) points out that in order to explore what privacy means, first we should look at privacy problems, which are “instances of particular forms of disruption to particular practices” (Solove, 2002). His framework presents privacy as “a set of protections against a plurality of distinct, but related problems” (Solove, 2002), which include information collection, processing, dissemination, and invasion.

Although neither Westin (2003) nor Solove (2002) intended for their conceptual frameworks to be used together, their two understandings of privacy complement each other and are particularly important for the current research. Solove definition of privacy emphasizes the problems and evaluations connected to privacy and will serve as a foundation for the definition of frame elements. The extracted frames will be examined at the political and socio-cultural level as described by Westin (2003). This study is interested in media discourse, where the choice of problems and ways of referring to them bear political meaning. At the same time media discourse is closely connected to policy discourse, its implications for how privacy may be framed will also be considered.

Framing of privacy

The conceptual work around privacy offers a basis for investigating framing of privacy in media reporting. Bringing it all together, the conceptualizations take particular meanings. Smith, Dinev, and Xu (2011) summarize privacy frames into two mayor directions. They distinguish between value-based (privacy as a right, privacy as a commodity) and cognate-based (privacy control, privacy state) conceptualizations. The protection of privacy in data collection may call for different remedies when privacy is framed as a right, compared to it being framed as a commodity (Epstein, Roth & Baumer, 2014). Scholarly attention to media reporting on security and privacy issues has grown in recent years, influenced by policy aftermath of the 9/11 terrorist attacks. Summarizing the communication research about issues of security, Papacharissi and Oliveira (2008) note that researchers have focused on public response and reaction to terrorist attacks, definition of terrorism, policy questions, media portrayals of terrorism, and framing among different media outlets and cultures (Guasti & Mansfeldová, 2014). Their analysis of US and UK media, suggests a symbiotic relationship between media and political agenda. This is relevant for the examination of privacy discourse as this study assumes that the political orientation of the newspaper could determine the way privacy issues are discussed in newspapers' articles. Close connected to these results is the research of privacy debates in the Internet Governance Forum (IGF) by Epstein, Roth & Baumer (2014). They use sophisticated tools to analyze the language used at the IGF from 2006 to 2011 and identify frames used by different stakeholder groups in privacy policy rhetoric. The article reveals that the focus of the privacy discourse at the IGF has evolved based on

the balance between “privacy rights” and “security” on the one hand and between civil society and state actors on the other. In their analysis Epstein, Roth & Baumer (2014) found out that governmental actors focus more on the tensions between privacy and security. The civil society discourse on the other side, was characterized by viewing privacy as a vulnerability that needs to be protected. The private sector framed privacy solely on the basis of privacy as commodity and technical solutions. These results lead to an expectation that privacy discourse in different media outlets will be separated in relation to the communicators of a particular frame (Epstein, Roth & Baumer, 2014). Fornaciari (2014) also finds a tendency in media coverage to frame personal information as a commodity rather than as a value. Guided by frame theory, she undertakes a discourse analysis of newspaper articles in order to discuss privacy concerns related to the collection and trade of personal information. Her study investigates the central organizing ideas, used in New York Times between 2000 and 2012 to discuss the economics of personal data. Fornaciari (2014) discourse analysis reveals four dominating frames: confusion and lack of transparency, justification and private interests, law and selfregulation, and commodification of information. Further she finds a tendency of episodic framing in the articles, focusing on specific violations rather than broader topics. This makes future research about personalization of privacy discourse even more interesting as it favors episodic framing - looking at issues from individual perspective, disregarding larger thematic contexts (Boykoff & Boykoff, 2007). The aspect is especially important for the analysis of privacy discourse during the NSA revelations, in order to examine if there is a tendency in the coverage of privacy to put attention away from the real issues, concentrating rather on personal information about politicians and individuals.

Research about the privacy discourse and framing also concentrated on analyzing privacy in relation to a specific social and political events. A good example for this is the analysis of the PNR debate. The PNR debate was part of broad privacy and security discussions. In order to understand the assigning of meaning to key political notions like privacy, Huijboom and Bodea (2015) apply the method of discourse analysis. The results of the study shows values and beliefs, which underlie the discourse. They reveal ‘beliefs’ in the prevention of future terrorist attacks on the one hand and in state surveillance and misuse of powers on the other. A trade-off concept defines the relationship between these ‘beliefs’, referring again to framing of privacy as commodity (Huijboom & Bodea, 2015).

Guasti and Mansfeldová (2014) confirms this and points out that threats to security are framed as transactional and beyond the scope of nation-states' control. Another crucial debate, which defined the modern history of privacy legislation is the conflict around ACTA, analyzed by Herweg (2013). This paper examines the role played by the Anti-ACTA movement for the failure of the agreement. By illustrating the configuration of the discourse on ACTA, Herweg (2013) argues that the opponents have occupied key frames. They achieved to dominate the discourse and to have a significant influence on the decision-makers in the European Parliament. Her study points out the important and conflicting role played by political and civil actors in directing the course of privacy debate.

Nevertheless the role of Internet giants and technology companies has not to be undermined, when discussing the construction of privacy discourse. Van Hekke (2014) elucidates the important role that technology plays when discussing privacy. He analyses the discourse about Google Glass as constructed by *The Verge* and finds two main perspectives within the debate. On the one side there are questions relating to the company-creator, on the other statements that relate to the people, using Google Glass to shape the debate. Van Hekke proves that technology such as Google Glass makes surveillance of both public and private spaces increasingly ubiquitous (Mann et al. 2003 in Van Hekke, 2014) and raises more awareness regarding the importance of protecting our privacy. Holmlund research (2014) illustrates the connection between public, policy and media privacy discourse. Her research examines the existence of a connection between the European public debate about privacy rights and the proposed data protection legislation reform. She shows that technology builds the nodal point in the EU's proposed data protection reform and shows that there is a discursive struggle within the EU material. At the same time the analysis of media reporting suggests that public debate during 2010-2011 and 2012-2013 is focused on the concept of surveillance - Internet users on the one hand, and surveillance - legislation on the other. Analyzing EU documents, one British and Swedish newspaper, Holmlund (2014) shows that the EU's proposed reform has been influenced by public opinion. Her study is increasingly important for the current research as it is one of the few, which compare privacy discussions and analyze privacy conceptualization over different periods of time.

Framing

One of the most important concepts for this analysis of newspaper coverage about privacy is framing. Particularly interesting is to find out, which frames shape the privacy discourse and how does framing of privacy differ between different countries and newspapers?

The theoretical concept of framing

Framing is one of the concepts in communication science, which still lacks a shared theoretical model and suffers operationalization problems (Scheufele 1999 in Fahmy & Kim, 2008). Most of the research about framing refers to media frames as patterns of interpretation, rooted in the culture and articulated by the individual (Entman, 1993). In order to clarify the intangible framing notion, Reese (2007) suggests a definition of frames as “organizing principles that are socially shared and persistent over time, that work symbolically to meaningfully structure the social world” (Reese 2007). The definition emphasizes the dynamics of the process of creating meaning and highlights the changes in framing over time. Similar to Reese (2007), Scheufele (2000) suggests that frames operate on a multi-level structure and experience multiple interrelated sub-processes. On a micro level frames represent cognitive structures, but looking at the broader picture they can form an important element of the public discourse. Therefore Gamson and Modigliani (1989) view frames as “central organizing idea[s]” of “interpretive packages” that help us make “sense of relevant events, suggesting what is at issue”.

In particular media and journalists are defining what is important when it comes to the public debate. Their role as interpretators integrates both newsworthiness and value judgments. Together they influence the production of texts with particular news frames (Brüggemann, 2014). Still, framing has different locations, it does not only occur on the level of journalists. Entman (1993) argues that there are different sources of news frames. Public actors strategically send out messages with a frame. Journalists frame their news stories. And finally, users frame information received through media channels. Even if it seems so, one cannot argue that changes in the media discourse automatically will cause

changes in the public opinion. These systems interact with one another: “media discourse is part of the process by which individuals construct meaning, and public opinion is part of the process by which journalists and other cultural entrepreneurs develop and crystallize meaning in public discourse” (Gamson & Modigliani, 1989).

According to Scheufele (1999) framing process consists of frame-building and individual-level-effects of framing, frame setting and journalists-as-audiences-effect. Traditional frame building research is interested in the internal factors such as individual characteristics or political orientations, which influence how journalists frame an issue (Gitlin 1980, Tuchman 1978 in Zhou & Moy, 2007). This process involves only journalistic practices and not interactions between the political actors or the public and the media. On the other side frame setting research is interested in how news frames shape the public’s interpretation of an issue. Theoretical arguments, resulting from experiments by Iyengar (1991), Pan and Kosicki (1993) and Kahneman & Tversky (1984) offer strong evidence for how differences in news framing can induce significant differences in the understanding and evaluation of these events by the public. Brüggemann (2014) elaborates Scheufele (1999) approach of media effects, suggesting that framing process lies on a continuum between frame setting and frame sending. He concentrates on the journalistic framing practices, which describe what journalists do when they produce media texts with certain frames and why they prefer them over others. Brüggemann (2014) claims that frame setting implies the idea that journalists mostly frame their coverage in line with their personal interpretations, whereas frame sending, indicates the practice of relaying on frames, presented by public actors. He concludes that journalists will apply frame setting when their articles reflect personal interpretations of an issue, e.g. through quotations with views that concur with the journalists own beliefs. This leads to filtered accounts (Brüggemann, 2014). Frame sending however will produce coverage, that reflects neutrally the different framing activities of different actors regardless whether the journalist recognizes these interpretations as credible or not (conduit accounts). In between, Brüggemann (2014) expects we can find framed frames (interpretive accounts).

In general, it is proven in that there is a strong interdependence between media and public actors, who compete in framing contest as sponsors of certain frames (Benford & Snow, 2000). Depending on their power they are able to shape media news (Hänggli, 2012 in

Brüggemann, 2014). Framing practices of groups with more symbolic capital like politicians for example, are particularly important due to the hierarchical structure of the divisions that shape the information landscape. For example Callaghan and Schnell (2001) studied how interest groups and politicians try to assert frames, which comply with their views into the media discourse. They found out that media news actively reconstruct elite frames. Entman (2004) also confirms this thesis, suggesting that a factor for frame presence is the power of the political actor. These considerations are particularly important for this paper, as it assumes that government's position towards privacy will influence the way media report about the issue in general and especially about political scandals connected to privacy. This makes an analysis of two newspapers with different political leaning per country, particularly interesting. The results will illustrate if there is a tendency for journalists to apply some sort of frame setting. If their articles reflect the political orientations of the newspaper and if the applied framing is in line with a certain political position. The concept is supported also by the indexing hypothesis, which states that "mass media news professionals . . . tend to 'index' the range of voices and viewpoints . . . according to the range of views expressed in mainstream government debate about a given topic" (Bennett, 1990 in Hänggli, 2011).

Nevertheless, media content does not merely mirror public actors' frames. Politics, issues, and events are subject to different selection- and interpretation criteria. These constructs are negotiated, contested, and modified over time (Matthes, 2011). All actors, participating in the framing process, are free to prefer some frames over others and modify the existing ones. Journalists, are not forced to transport frames, proposed by the political elite, as they can create new or reframe old arguments, suggested by other communicators. The same applies for the audience, which often frames issues in ways that are not suggested by powerful communicators (Matthes, 2011). Given this fact, frames are selective views on issues, which construct reality in a certain way leading to different evaluations and recommendations (Entman, 1993). Framing is best conceptualized as a process that evolves over time. It is a dynamic process and thus allows e.g. political elite to react to the frames in media reporting or to citizens' frames, revealed by opinion polls by promoting other frames (Matthes, 2011). Subsequently, these frames could be potentially observed by other elites who can react with counter-framing the issue. Additionally the dimension of time allows us to separate new issues from previously debated that are familiar (Chong and Druckman, 2007). This paper will

analyze privacy reporting, especially considering reframing and the time dimension of framing concept. Comparing the topics and frames, which shape the media discourse on privacy over different periods of time, allows us to track the development of particular discussions, which together construct the overall debate about privacy. Further the paper will examine media coverage in relation to reframing, if different newspapers construct and present “traditional” privacy issues over time differently. The comparison of timeframes enables us to connect particular frames to the political agenda and events shaping the discourse at that time and examine if they lead to different evaluations and recommendations in media texts.

Frames as elements of perceived reality

Regardless of its specific application, the concept of framing provides a consistent way to describe the power of communicating text. Important for this study of media frames is especially Entman’s understanding of framing as a fractured paradigm (1993). He summarizes the functions of frames in his definition: “To frame is to select some aspects of a perceived reality and make them more salient in a communicating context, in such a way as to promote a particular problem definition, causal interpretation, moral evaluation, and/or treatment recommendation for the item described” (Entman, 1993). It is known that media reports select certain aspects of reality and emphasize them, but Entman definition also raises the question of how they are organized in order to cause certain effect. It is a big step forward in the empirical tradition of communication research to recognize that there are individual characteristics, and when taken together, they tell a bigger story than the manifest one (Reese, 2007). Entman (1993) distinguishes between substantial and procedural framing. Procedural Framing refers to the evaluation of political actors because of their appearance, charisma, their representativeness, etc. and is not essential for the present work. Substantial framing is present when at least two of the following frames features can be detected (Entman, 1993): *problem definition* (determines what a causal agent does, and what the costs or benefits his/her action will bring, usually measured in terms of common cultural values), *identification of causes* (identify problem agents), *solutions / treatments* (offer and justify treatments for the problems and predict their likely effects), *moral judgments* (evaluate causal agents and their effects). A complete media frame of a reported issue thus includes a definition of the

problem, cause analysis, a proposed solution and a moral judgment. The two main characteristics are the definition of a problem, as this definitely defines the rest of the functions of a frame and the proposed solutions, because they are mostly associated with the actions of the political elite (Entman, 1993). The configuration of these elements is accompanied by the selection of certain aspects of events. This sets automatically priorities, which in turn suggest a particular interpretation of the event from the public (Entman, 1993). It will be therefore necessary to examine what are the aspects that were emphasized in the media coverage of privacy during the selected periods of time. With the emphasis of a point as opposed to another, a certain image of the event is created, which from a psychological perspective causes certain effects by the audience and their classification of what happened (Entman, 2004). To a certain point, privacy frames work in the same way as described by Entman, they select or highlight information, include some aspects or problematic elements of the topic, formulate a possible solution or make moral judgments. Referring to the development of privacy reporting over time, this paper aims to pay attention to changes in framing and to consider what causes them. A number of recent studies deals with framing of the coverage about privacy. In particular, the recent events surrounding privacy intrusions provided the ground for various investigations (Epstein et.al. 2014, Lapenta & Jörgenssen 2015, Holmlund 2014, Fornaciari 2014, Bauman et.al. 2014, Guasti & Masfeldova 2014, Wu 2014, Petley 2014). Important findings for the construction and understanding of frame elements in this paper, provide the studies of Holmlund (2014) and Fornaciari (2014), which should therefore be presented in more detail here.

Holmlund (2014) analyses the possible existence of a connection between the public debate about Internet privacy and the EU's proposed data protection legislation. The data gathered from EU documents, one British and one Swedish newspaper and suggests that the EU's proposed reform has been influenced by public opinion. The problem image created through the legislation reform is the difficulty of protecting personal data and ensuring functioning market. This issue is caused by a rapid technological development. The material draws connections between technology, communication and information and links technology to virtual innovations. The solution of this problem goes via legislation. This first analysis of EU material marks some of the crucial elements, which will be used for the framing analysis of privacy discourse in newspapers. Technology as a problem

and as a cause simultaneously, together with the legal solutions, mark the first chain of categories used for the applied content analysis.

Holmlund results shows that public debate is established around the signs of surveillance, user and legislation as nodal points. The study revealed two images for each of the selected timeframes. In the time between 2010-2011 privacy problems appear to be the increasing amount of different forms of surveillance and problematic situation with privacy policies. They are caused by user confusion and concentration on national security. The discourse analysis reveals no concrete solution. During the 2010-2011 period in the public debate, user discourse was given more space, whereas in 2012-2013 the discussion regarding surveillance expanded. The landscape of privacy debate changed in 2012-2013 as new types of surveillance emerged. The increasing lack of privacy appear to be the dominant problem. Holmlund (2014) connects the cause of privacy breaches to concrete events of surveillance as the NSA scandal and other privacy violations. For the present work these results are of great importance. They justify the assumption that for the analysis of frames in privacy discourse, it does not make sense to look for complete packages of frames, placed in a narrative. Therefore the focus of framing analysis, applied in this study, will be on the items, which help build a frame. The collection of frame elements has also practical reasons, which will be explained in the methods section below. After collecting the elements, the study will examine in what kind of combinations they appear in the reporting, in order to make statements about frame packages.

Another important study is Fornaciari (2014) "Framing the economy of information in the digital age". She investigated frames in articles, published in The New York Times from 2000 to 2012 and explores how frames emerged in news coverage of privacy. Fornaciari (2014) finds four dominant frames in the articles: confusion and lack of transparency, law and self-regulation, justification and private interests, commodification of information. Articles framed as lack of transparency discuss the inability of users to make informed sharing decisions, because of complex privacy policies. Further Fornaciari illustrates that articles, using the frame "justification and private interests", discuss the unbalanced relationships between users that disclose information and marketing companies who collect and sell that information. Consistent with other privacy research (Schwarz 2013, Sarikakis & Tsapogas 2013, Schwarz & Solove 2011), the majority of the articles explained how existing laws and regulations are often not suitable to effectively regulate privacy. Further she connects the frame "personal information as commodity" to the trend

in Western societies to conceptualize of privacy from a civil right to a commodity, exchanged for certain benefits. Fornaciari (2014) found during the selected period that articles used mostly episodic framing, talking about infringements rather than broader questions. For the present work, these findings are crucial, because they show the need for a comprehensive quantitative approach on framing analysis, which places the term privacy in a different cultural and political contexts. Important for this study is also Fornaciari critique on the role of mass media in privacy debate. She discusses that media discourse tends to simplify the complexity of online privacy, often providing only few facets of the issue. Articles fails to inform readers, with necessary details about how to protect their information from misuse and inappropriate flow of personal data (Fornaciari, 2014). For this paper mainstream media also provides an area where discussions about privacy infringements and privacy policies may take place. Therefore it will be important to test if privacy debate in six leading national newspapers will reflect the characteristics mentioned by Fornaciari or it will facilitate a dialog about privacy problems and discuss concrete solutions.

Framing of political scandals

A central aspect of this paper is the NSA scandal and the public debate, encouraged by the publication of the Snowden leaks. This event is assumed to be one of the breaking points in today's understanding of surveillance and privacy intrusion. It had a substantial impact on an international level and opened up debates about public awareness of surveillance. The revelations opened up a conflict between citizens' right to privacy and security threats (Branum & Black, 2015).

Mediated political scandals have grown in frequency over the past centuries when journalism has sought to attract large audiences. A great part of scandal coverage consists of research on political wrongdoings, which brought about a critical analysis of newspaper reporting style. Indeed when discussing intelligence 'scandals' and leaked information there is always a reference to media reporting about it (Hillebrand, 2012). According to the 'shock theory' of congressional accountability media plays a major role in setting off the 'alarm' in case of major failures (Johnson 2007 in Hillebrand 2012). Nevertheless Bakir (2015) points out that in United Kingdom the debate over Snowden's

revelations has got less attention from the press (apart from Guardian), and among politicians compared to other Western countries. While the debate over Snowden's revelations continues to progress in United States, in United Kingdom it has not gained enough attention from the press and thus also among politicians and the public. Bakir (2015) explains this fact with Britain's more established culture of official secrecy, GCHQ's mass surveillance, and the political pressure from the United Kingdom's administration on the Guardian for the release of the Snowden leaks. Public opinion polls also show that, unlike the Americans, the British public does not have a favorable opinion of the Snowden leaks (Angus Reid Global, October 2013 and YouGov 2014).

The analysis of media coverage of political scandals has also pointed to various biases and frames that attract audience attention like soft news topics (Baum, 2003 in Just & Crigler, 2014). Considering the role of mass media in political scandal, Bennett (2002) states that it tends to create illusions of diversity, consistency and importance through framing that suits the tastes of different segments of the market. He addresses four news biases in media reporting about political topics in particular- personalization, dramatization, fragmentation, and the authority-disorder bias (Bennett, 2002).

Communication scholars have developed considerable empirical support for these four information biases in the news and showed that the tendencies toward personalization, dramatization, and fragmentation are consistent over time (Thompson 2000, Harcup and O'Neill, 2001; Boykoff, 2006). In their comparative analysis of mediated political scandals Just and Crigler (2014) show that the NSA/Snowden scandal was evenly divided between institutional blame and blame on a single individual—Edward Snowden, with 36.4% of the articles discussing personal ramifications of the scandal. They further examined the reporting for Bennett's personalization bias and showed that 41.7% of the articles about NSA/Snowden were personalized (Just & Crigler, 2014). The research revealed personalized stories about accusations against individuals like President Obama, Hillary Clinton or individual members of the military and Edward Snowden. Just and Crigler (2014) state that by attributing blame to one or a few individuals, media coverage of political scandals may divert attention from institutional problems. Iyengar (1991) also comes to similar results in his research on the influence of television news framing. He shows that when stories are framed around individual victims, viewers will not attribute responsibility to institutional factors. Framing scandal coverage around one or few people

may trivialize the events (Just and Crigler, 2014), because it puts the attention away from more essential debates. Further Entman (2012) argues, that partisan media usually covers scandals differently, because it is motivated to spread information in favor of their fellows and denounce opponents. In relation to this Branum and Black (2014) examine the reporting strategies of the British press regarding the NSA scandal and identified variation in the style, content and stances of The Guardian, Daily Mail and Sun towards state surveillance. Evidential were also the ideologies, applied within each paper. While The Guardian was critical of surveillance and defensive of its decision to release Snowden's documents, The Sun was highly supportive of state surveillance. They also found strong personalization bias towards Snowden personal life in Daily Mail reporting on the scandal. These results confirm that British media was internally split on the issue about Snowden revelations. The differences were caused by each newspaper's ideology, news values and audience considerations (Branum & Black 2014). The results of Chandwick and Collister (2014) regarding Guardian reporting about the NSA scandal are also in line with Branum and Black (2014) considerations. They reveal that Guardian reporting about the scandal is a sign that adaptive professional news organizations can successfully use their power to shape politics and challenge state power. Petley (2014) examined and compared the reactions of the government and the British press to the NSA scandal. He states that newspapers such as the Sun, Mail and Telegraph were not supportive of the revelations, in contrast they were supportive of the government position and insisted for Guardian to be prosecuted. Petley (2014) suggests that the British press was not acting in line with the Fourth Estate' model of journalism and that, apart from Guardian, it was a key part of the Establishment strategy rather than a watchdog function. Therefore, it is not surprising that when the government and the security services declare agenda of 'journalistic activity endanger national security' (Petley, 2014), most newspapers act accordingly. Qin (2015) found that social media users associated Snowden's case with other whistleblower, bipartisan issues, and personal privacy issues, while mainstream media associated the incident with issues of national security and international relations. The results point out that frames on social media portray Edward Snowden as a hero while the frames on legacy news present him as a traitor Qin (2015). Further he identified considerable differences in media frames on legacy news and social media regarding word salience and word selection.

This paper expects a “ tendency to downplay the big social, economic, or political picture in favor of the human trials” (Bennett, 2002), especially in these countries, which earned a reputation concerning national security, intelligence agencies and which international relations could suffer because of the revelations. The intersection of Snowden and political actors could become a “competition between personalities struggling for power and acting strategically in order to improve their prestige and socio-political leverage” (Boykoff & Boykoff, 2007). For this reason it is important to study if privacy discourse is centered around blame on a single individual, which will affect the watchdog function of the media and its ability to question government policies and provide detailed information.

Research Questions and Hypotheses

According to concept of framing, applied in this study, media frames news through selection and emphasis of certain elements. Therefore, a careful examination of the topics connected to privacy and the frequency of their use can reveal much about the organizing ideas and framing choices of the selected newspapers. Previous research has showed the importance and need for a comprehensive quantitative approach on framing analysis. Both Holmlund (2014) and Fornaciari (2014) confirm the assumption of a relation between media, political cultures and the public perception of privacy. The study of PNR debate elaborates the analysis of privacy, capturing the interrelations between complex values such as privacy and security. It reveals two mutually exclusive beliefs like the prevention of future terrorist attacks and state surveillance and misuse of powers (Huijboom & Bodea, 2015). However, privacy debates have been examined mainly qualitatively and on a national level. This makes an international perspective on privacy discourse even more important. In particular Entman’s (1993) approach for framing analysis can be useful to examine, which are the problems connected to privacy and what are the existing solutions. In order to extend current research on this topic, the present study will investigate:

RQ1 Which frames shape the privacy discourse before, during and after the NSA Scandal?

RQ2 In what ways do newspapers’ frames differ in covering privacy issues?

RQ3 How does framing of privacy issues differ between different countries and media cultures?

A cross-cultural analysis lies at the center of this study and I want to provide insight not only about the development of the debate, but also about variations in the reporting in countries with different policies towards data protection, as well as different positions in the NSA scandal.

According to Holmlund (2014) the analysis of privacy discourse during the 2013-2014 period is marked by discussions about privacy breaches and draws a much more concrete image of surveillance than during the previous period. The discourse moved away from earlier topics to make place for a strong and independent discussions during the 2012-2013 period. Therefore I suggest following trends for the privacy discourse during the selected timeframes:

H1: Privacy discourse after Snowden revelations will be more concrete in comparison to the discourse in 2012, concentrated on surveillance as a formulated threat to privacy and the lack of sufficient legal solutions.

Current research suggests that during the NSA scandal American and British media has defended the agency and the US and UK administration for their indiscriminate spying operations (Qin 2015, Bakir 2015, Branum & Black 2015). Apart from Guardian, most recent research on the topic links British and American coverage on this issue together. It explains that political pressure applied from United Kingdom's administration on Guardian and GCHQ's mass surveillance leads to an unfavorable opinion of the British public about Snowden and his revelations (Bakir 2015, Greenwald 2014). Qin (2015) reveals that mainstream media associated the incident with issues of national security and international relations, rather than whistleblower, bipartisan issues and privacy protection issues. On the basis of these results, I have built following hypotheses:

H2: Because of entrenched culture of official secrecy, reports about privacy protection and privacy violations before and after the Snowden leaks will be less visible on British and US newspapers than in German (2012-2014).

H3: All US newspapers will frame privacy during NSA scandal connecting it to national security and international relations, rather than focusing on surveillance problem (2013).

This paper assumes that the NSA scandal in 2013 had an impact on the development of privacy discourse. As personalization is so obvious in the coverage of individual scandals, it is interesting to see if it will define political scandals like the one about Snowden revelations. Literature about political scandals suggests that media coverage is biased, it aims to attract attention and focuses on individuals rather than abstract ideas (Bennett, 2002 in Boykoff & Boykoff, 2007). Instead of concentrating on the context, media reporting will personalize privacy issues by focusing on the individual claims-makers. To put it another way, the macro structure of the debate will be neglected in favor of the micro, in favor of personalized stories. This could divert attention from bigger problems as Just and Crigler (2014) point out. Drawing on previous literature about the unfavorable coverage of American and British media about Snowden revelation, I hypothesize that newspapers in these countries will tend rather attribute of blame on a single individual, neglecting the context of the scandal. Of particular importance for this paper is the following question and hypothesis:

RQ4: To what degree do newspapers personalize privacy discourse concentrating on a person or an institution involved in the scandal?

H4: USA and British newspapers personalize the NSA scandal more in comparison to German newspapers, concentrating on Snowden or political figures.

Research Methods and Data Collection

Definition of the timeframe and unit of analysis

The timeframe 2012 – 2014 was selected to capture the narratives of privacy discourse that developed during years of growth of surveillance techniques, terror attacks as well as new online communication forms and growing power of Internet giants. Each of the years is marked with different discussions and problems regarding privacy. 2012 was marked

by petitions and huge protests regarding ACTA and data protection. The year 2013 was shaped by the NSA revelations and debates about agencies' espionage and privacy infringements. 2014 can be considered as the outcome of the above mentioned debates. The reporting provoked progression in EU data protection legislation, encouraged debates between legislators and Internet giants and reflected on events, driven by the Snowden revelations.

To facilitate and simplify the comparison between different periods and countries, for this analysis of privacy discourse one year after and one year before the revelations, I decided to take exactly the same timeframes – from 01. July to 31. July. This period was chosen for several reasons. One of them is the fact that NSA scandal plays a major role in this paper as it is considered to be a driver of changes in privacy debates. Although the first leak was published on June 5, 2013, when The Guardian covered NSA slides on the boundless informant, there were more and more that followed in the next weeks of coverage. Additionally it doesn't make sense to select June for the analysis of the personalization of privacy debates as in the first weeks Snowden's identity remained uncovered. On the 5 June The Guardian publishes its first exclusive story based on Snowden's leaks. On 7 June Barack Obama starts to defend the two programs in public, saying that the right balance between privacy and security has to be stabilized (The Guardian). Guardian reveals the identity of its secret informant on 9 June, when Snowden decides to go public in a video interview (The Guardian). Another reason for the choice of this period is the fact that at the end of June and the beginning of July the issue has gained enough news value to encourage a worldwide discussions about Germany's role as US ally, South America's supportive role of the NSA contractor and Snowden's temporary settlement in Russia. The public attention in July grew even more, as the number of people, affected by the revelations resp. by NSA indiscriminant collection of private data, grew with each new story, uncovering new surveillance targets and tools.

The unit of analysis for the study is article level. Headlines were not coded separately (apart from personalization variables), but they were interpreted as an integral part of the text. Photographs and any other figures as well as their captions were not included in the content analysis.

Data collection and newspaper articles

In order to demonstrate the development of privacy discourse across different countries, I will analyze framing of some of the most influential newspapers in Europe and US. While it is very difficult to situate a newspaper along a political spectrum, it is possible to understand its political leaning when newspapers are compared to others within their own nation (Fahmy & Kim, 2008). *The Guardian* is among the world's most respected newspapers (Fridriksson 2004 in Fahmy & Kim, 2008), and is viewed as a left-oriented newspaper in the British media system (National Dailies, 2004). The picture changes for *The Daily Telegraph*, as 57% of its readers support the Conservatives (Hallin & Mancini, 2012). *The New York Times* is also considered as more liberal in comparison with most of US newspapers. It is a premier member of the elite press in the US and the world (Fahmy & Kim, 2008). Washington Post is not considered to be a conservative press in the US media system, but it positions itself as more conservative than NYT (Washington Post). According to Hallin and Mancini (2004) within the German media system, Sueddeutsche Zeitung and Frankfurter Allgemeine are viewed as more liberal than Die Welt, which has more conservative political leaning.

Articles were retrieved using the database LexisNexis. The initial selection resulted in more than 800 articles for July 2012, more than 1400 for July 2013 and around 1060 for July 2014. The sample however consists of 50 randomly selected articles for July each year for every newspaper, which should be representative for the coverage of privacy topics during the selected timeframes. All of the selected articles were considered appropriate for the study after a preliminary screening, thus yielding a sample of 900 articles for the content analysis. The keywords, used for the collection of articles, originate from the available research about privacy. One part was selected from the critical discourse analysis of Van Hekke (2014) and the other came from qualitative research about privacy (Holmlund 2014, Huijboom & G. Bodea 2015). I used the constructed word-chains for each of the timeframes in order to understand, which words are relevant for the coverage of privacy for each period. All the collected keywords were then complemented by expressions found in the keyword section of articles about privacy (Blanchette & Johnson 2002, Dinev 2014, Fornaciari 2014, Guasti & Mansfeldová, 2014). At the end all of the collected 21 keywords had to be reduced to a manageable amount that fits the scope of the study. First I checked for words that overlapped

semantically. Later, using the search engine of LexisNexis I made a pre-check if all of the words deliver any results in the research engine and if these results were useful for the purpose of the study. At the end the amount of keywords was reduced to seven strings of keywords, used for the search in English: “*Privacy, Privacy rights, Privacy policies; Data protection, data legislation, data gathering, personal data; Surveillance, Monitoring*”. The keywords used for the German newspapers were translated from English and semantically compared with relevant words in Rizk et.al. (2009). As most of the literature about privacy came from English sources it was impossible to collect as many keywords in German. Therefore the keywords, used for the German newspapers, were translated as follow: *Datenschutz, Datenschutzrecht, Datenschutzgesetz, Datensicherheit; Überwachung, Überwachungsmaßnahmen*. For the coding procedure the variables, defined in the codebook were directly transmitted into the statistical program SPSS.

Concepts and measurements

Frame elements

There are two concepts of particular importance for this research. The first relates to Entman (1993) understanding of media frames as promoting a particular problem definition, causal interpretation, moral evaluation, and/or treatment recommendation. It guides the design of the study and the interpretation of the results. There are two possibilities to operationalize frames. The first option is to conduct a qualitative research to collect the frames, implemented in newspapers’ articles about privacy. Second, and this is the approach, applied in this paper, frames can be constructed based on recent communication research about framing of privacy. Later, during the coding procedure these variables will be further redefined and extended (Matthes and Kohring, 2008). This is a combination of a deductive and empirical approach to frames, as they are based on relevant privacy literature, collected quantitatively and extracted empirically. Following this method, I will use the identified frames from Holmlund (2014) and Fornaciari (2014), as well as other, mentioned in the research about privacy in order to construct categories for the following frame elements – *problem definition, causal interpretation, moral evaluation and suggested treatment*.

Even though Holmlund (2014) applied a qualitative approach to examine privacy discourse, her method was very similar to the one used in this study. She analyzed every timeframe in relation to the problems, causes and solutions suggested for privacy from the media coverage. As opposed to this, Fornaciari (2014) constructed frames, which were much more general and needed to be semantically separated into pieces in order to ensure extensive and exclusive categories, which could be used as frame elements in this study. For example based on Fornaciari interpretations, the frame *Confusion and lack of transparency* was translated into Problem definition – user confusion, Cause – lack of transparency in privacy policies and Treatment recommendation – transparent policies towards privacy. The same procedure was applied also for Huijbooma & Bodea (2015) beliefs, extracted from the PNR debate. The *belief in state surveillance and misuse of powers* was divided in Problem definition - misuse of powers (when governments or agencies use illegal measures to achieve their goal) and Problem definition - monitoring/surveillance threat (regular surveillance from security agencies, that increase security but threatens privacy).

In all, 20 frame elements were collected and elaborated using Holmlund (2014) research as a basis and Fornaciari (2014), and Huijbooma & Bodea (2014) in addition. The first frame element represents the definition of problems. They determine “what a causal agent is doing with what costs and benefits, usually measured in terms of common cultural values” (Entman, 1993). Across the most important categories, identified by the literature as problems are: (1) *Complicate regulation of privacy online*, (2) *EU implementation of privacy laws among the member states*, (3) *Lack of sufficient legal solutions*, (4) *Monitoring/surveillance threat from security agencies*, (5) *Use Technology* etc.

The second frame element, Causal interpretation, refers to the forces or actions, creating the before mentioned problems with privacy. Privacy literature revealed in all 11 categories, which can be interpreted as causes of the before mentioned problems. Some of the extracted frames are: *Technological development*, *Increasing legislation supporting surveillance*, and *Lack of communication about privacy protection* etc. Again the frames originate mostly from Fornaciari (2014), and Huijbooma & Bodea (2014). For the construction of causes Holmlund (2014) study was primary as a reference point. One of the difficult parts of this study, was to identify categories that comply with the element - moral evaluation of actors' actions. In comparison previous research, applying

this method for studying media frames (Matthes & Kohring 2008, Lück 2009), this paper understands moral evaluation not only in terms of negative, positive or perhaps neutral statements about “causal agents and their effects” (Entman, 1993). Such fragmentation could potentially decrease reliability, because it will be complicated to ensure that one statement will be evaluated likewise by more than one coder. Therefore, I decided to search for concrete evaluations, mentioned in the literature about privacy. All of the elements below originate from Van Hekke (2014), Fornaciari (2014) and Huijbooma & Bodea (2014). However, it is important to note that the author did not identify these statements as frames, these are evaluations, made by researchers in relation to privacy debate and based on their theoretical foundations. For this paper I used in sum 10 moral evaluations some of which are:

- *Companies “harvest” and “exploit” personal information for commercial purposes;*
- *Journalists rarely facilitate a comprehensive understanding of privacy problems;*
- *Existing regulations are not suitable to regulate the use of personal information;*
- *USA use coercive means to force countries (including the EU) to comply with their measures;*

The final frame element refers to the suggested solutions. It includes an appeal for or against a certain action. Most of the extracted categories originate from Holmlund (2014), as she is the only one, who identifies clear treatments in the media coverage about Internet privacy. To guarantee that the categories referring to treatment recommendation are extensive, they were compared with suggested solutions by Fornaciari (2014) and other authors, considered as relevant for this paper. Some of the extracted categories are: *European privacy legislation, Harmonized legislation across nation-states, Surveillance will improve safety etc.*

All categories of the four elements - *problem definition, cause interpretation, moral judgment and proposed solution* were coded independently from one another on the basis of their occurrence with 0 for no occurrence or 1 for occurrence. For this approach speaks the aforementioned study by Lück (2009) and the practicability for cluster analysis.

Personalization

Personalization has been recognized as a decisive trend in the contemporary political communication (Holtz-Bacha, Langer & Merkle, 2014). Although it has mainly been covered in studies about political campaigns, recent research about political conflicts shows a tendency in media reporting to personalize political scandals (Boykoff & Roberts 2007, Boykoff & Boykoff 2007, Just & Crigler 2014). The articles from Van Santen & Van Zoonen (2010) as well as Bennett (2002) and Vliegthart, Boomgaarden and Boumans (2011) will serve here as models for approaching the multidimensional concept of personalization. Van Santen and Van Zoonen (2010) use a threefold understanding of personal narratives. They divide personalization into individual competence, private life and emotional reflections (Langer 2007 in Van Santen and Van Zoonen 2010). This conceptualization is replicated in this paper. Figure 1 shows three forms of personalization that will be used in this study: individualization, privatization and emotionalization.

PERSONALIZATION

professional and personal qualities	private persona / private life	personal emotions
↓	↓	↓
INDIVIDUALIZATION	PRIVATIZATION	EMOTIONALIZATION

Figure 1: Visual depiction of the operationazation of personalization

Van Santen and Van Zoonen (2010) define *Individualization* as the total attention in an article devoted to an individual's competence as relevant for his/her performance. The term refers to professional qualities (i.e. accomplishments, knowledge, skills, and talents) as well as personal qualities (i.e. those not directly related to the job, but to the person itself such as likeable, personable). *Privatization* means the total attention in an article devoted to an individual's private life as well as his/her personal relationships, interests, and activities as distinct from his/her public or professional life. If one of the dimensions - family and love life, education, lifestyle, personal appearance, age or religion is mentioned in an article, this means that there is a reference to privatization.

Emotionalization on the other side, refers to articles which emphasize personal emotions, feelings and moods. It also includes emotional accounts or reflections on an emotional

event, as well as emotional experiences. Overall attention is measured on a basis of the number of mentions per article. Mentions in the headlines are counted twice (Vliegenthart, Boomgaarden and Boumans, 2011).

The differentiation of three separate elements as part of personalization is relevant for the operationalization of the variable. For the purpose of this study, however, it is not important which of the three personalization typologies appeared in a certain article. More important for this paper is to create an index for personalization for each of the articles or in other words to standardize personalization and make it comparable over the different newspapers. The formula, used for the measurement of personalization degree in the text, is based on the idea of how many times personalization, as the sum of all personalization elements, is present in an article. Then it is divided through the number of words in the particular article. The calculated result will be compared over articles and newspapers in order to find the highest personalization value from all of the reports on the topic of privacy. In order to this the calculated value, created for each of the articles is divided through the highest personalization value, found by cross-referencing all the newspapers. The mean of the personalization index of each newspaper will serve as a credible basis for the comparison of the newspapers. The crucial part of the calculations is the assumption that the length (measured in number of words) of an article is the key to juxtapose the coverage of newspapers in relation to their personalization. For example if article A has 100 words and 10 from them mention personalization, it wouldn't be equivalent to article B, which has 700 words with 20 personalization mentions. Article A has 10% of its content devoted to the personal life or emotions of individuals, which will trivialize the story (Just and Crigler, 2014). At the same time, even though article B has more mentions of personalization, only 3% of its content will drive the attention away from the essential story, focusing on personal narratives. Taken together it is assumed that personalization relates negatively to the number of words.

Determination of media frames by hierarchical cluster analysis.

In their article "The Content Analysis of Media Frames: Toward Improving Reliability and Validity" Matthes and Kohring (2008) propose a new methodological approach to the

evaluation and analysis of media frames based on Entman framing definition. First they illustrate and criticize the five most common methods for studying framing. Following these considerations they propose a new method for framing analysis, which has the purpose to solve problems of other methodological approaches in terms of validity and reliability. Based on reflections about other methods for studying framing, the authors develop approach, which originates from Entman's idea of a frame as pattern in a given text that selects "some aspects of a perceived reality and make them more salient in a communicating text" (Entman, 1993). Instead of the entire frame to be coded directly, a division into frame elements will be applied. These elements can be relatively easily coded in a content analysis. Thereafter, a hierarchical cluster analysis of the elements should uncover the frames.

In the definition of Entman (1993) several frame elements constitute a frame: a *problem definition*, *causal interpretation*, *moral evaluation*, and a *treatment recommendation*. In this paper these elements are understood as variables, each of them consists of several categories in the content analysis. A *problem definition* can include issues that are defined by an article as problematical. A *causal interpretation* should name or identify the 'forces', creating the problem. An *evaluation* refers to the actions of different actors in the privacy debate and evaluates them. Finally, a *treatment recommendation* can include a proposal for or against a certain solution. Taken all together, a frame is made of multiple elements and these frame elements are composed of content analytical variables. Frames are not identified beforehand, although the variables of the elements are collected deductively from present communication research. The coders do not know which frame is currently coded, because he/she is not coding frames as a unit. Therefore also the impact of the coder and coding expectations is weaker. The variables that characterize the frame elements are grouped together by hierarchical cluster analysis.

Cluster analysis is among the multivariate statistical techniques. Generally by using cluster analysis, the complexity of data can be reduced, by taking most similar cases within a cluster together (Schendera, 2010). Cluster analysis is a major technique for classifying a huge amount of information into manageable parts. Like factor analysis it is a data reduction tool that creates subgroups. In cluster analysis, the groups are defined in the process of analysis (Aldenderfer & Blasfield, 2014). Further cluster analysis is not a single process but a generic term for a group of heterogeneous approaches that allow

objects to be grouped, according to their characteristic attributes in such a way that the similarity between the objects within a cluster is as large as possible and at the same time the similarity between the clusters is minimized (Schendera, 2010). For the following study the hierarchical cluster analysis is crucial for several reasons: 1) the present binary data can be evaluated only on the basis of the hierarchical approach; 2) it is the only method, which scree-test provides criteria to decide how many clusters have to be extracted; 3) the process allows the calculation of multiple solutions, which can be used by the researcher to compare clusters interpretability. The method finds relatively homogenous clusters based on the measured characteristics. At the beginning of hierarchical clustering each case forms a separate cluster and then the model combines them sequentially, reducing the number of clusters at each step until only one cluster is left. The clustering method uses the dissimilarities (distances) between objects when forming the groups. Based on Matthes and Kohring (2008) and Lück (2009) the Ward method will be applied for the determination of the distance between two clusters. This method uses an analysis the variance in order to evaluate the distances between clusters. In general, it is one of the most effective methods for the determination of clusters (Aldenderfer & Blasfield, 2014). Cluster membership is measured by the summation of the squared deviations from the mean of a cluster (Aldenderfer & Blasfield, 2014). The criterion for fusion is that it should produce the smallest possible increase in the error sum of squares. After summation of the distances those two clusters are combined to form a new cluster, which result in the smallest increase in the total sum of the distances (Bühl, 2008). In a next step, the mean values of the frame elements in the clusters are compared. The characteristics that occur in a cluster most often will build the basis for the interpretation of the frames.

Reliability

Before the real coding procedure, I applied a pretest in order to check for inaccuracies and mistakes in the definitions of the content analytical variables. To ensure a solid and a credible basis for the content and framing analysis this pretest tested both intercoder-reability and intracoder-reability. Intracoder reliability provides a computation of the consistency of the judgments within a coder over time. More specifically, it assesses the amount of inconsistency resulting from other factors such as definitions, carefulness etc.

that occur during a period of time. Intracoder reliability differs from intercoder-reability in that the second one measures the consistency of the judgments made by two coders. I randomly selected 30 articles from all newspapers, which will be used for both reliability tests. As already mentioned for the intracoder-reliability the selected articles were coded twice from the same coder over a certain period of time. The interval between the first and second coding procedure was one week. Using the Holsti formula an agreement of 95 % was achieved between both coding procedures. The test was applied only to content categories. The variables chosen for the reliability analysis included actors (90% agreement) and topics (93% agreement) as well as all the categories, referring to the frame elements (problem definition= 96%, causal interpretation= 97%, moral evaluation= 96%, treatment= 97%). In a next step the intercoder reliability was assessed as a second independent coder had to content analyze the selected 30 articles. The test revealed a match of 89 % between the two coders, again measured using the Holsti formula. The highest result was achieved for the category cause identification, which is part of the frame elements. It generated a score of 92% agreement. The lowest result was measured for the coding of actors – 78% of agreement. This is due to the decision to allow up to 6 actors to be coded per article, a procedure relative new to the second coder. A better briefing could potentially minimize the differences. However, all other categories achieved a good reliability, especially taking into account the degree of difficulty of the framing categories (topics= 89%, problem definition= 89%, causal interpretation= 92%, moral evaluation= 92%, treatment= 93%). The relatively high scores, achieved by the frame elements variable support the remarks made by Matthes and Kohring (2008) that the collection of single frame elements using binary variables is a reliable way to comprehensively detect the frames of news reporting.

Analysis of data

Descriptive Categories

In the period from 01.July 2012 to 01.July 2014 the paper examined 900 articles (50 randomly selected articles for each period and newspaper) about privacy topics. All of the articles were accessed through LexisNexis search engine. In the first timeframe from 01.July 2012 to 31.July 2012 LexisNexis revealed 814 articles from all of the selected

newspapers. Figure 1 shows the relative frequency of the coverage on the topic of privacy compared to the overall reporting of the newspaper in July. The overall coverage for each newspaper has been estimated on the basis of the number of articles, published in the first week of July. Guardian and NYT produced the majority of all reports about privacy, but the picture changes when we relate their articles to the overall coverage of the newspapers. In 2012 Guardian devoted 2,65% from all of its coverage for July (N= 7976) to privacy topics. It produced in sum 211 articles discussing privacy issues. The Guardian is closely followed by NYT. The American newspaper addressed privacy in 2,71% of its coverage for July, 2012 (N=140). Interesting appears that both German newspapers Die Welt and Sueddeutsche Zeitung are at the very end of the list, because their reporting about privacy in 2012 makes only 2,39% and 2,33% respectively of the overall coverage. The picture changes in 2013, when Daily Telegraph and the more liberal German, Die Sueddeutsche are at the very end of the list when considering how much of their overall coverage for July 2013 was devoted to privacy. This time not only Guardian and NYT provided an extensive privacy debate. Remarkable is the fact that Washington Post and Die Welt have increased their privacy reporting, devoting 6,31% and 6,44% of their articles in July 2013 to privacy topics. The Guardian also covered a great amount of privacy topics during 2013 and its reports constitute 5,34% (N=377) of its articles for July 2013. Further, in Sueddeutsche Zeitung there were 3,63% articles focusing on privacy (N=168). The British newspaper Daily Telegraph produced the lowest number of reports focusing privacy. Only 1.37% of its overall coverage was devoted to that topic.

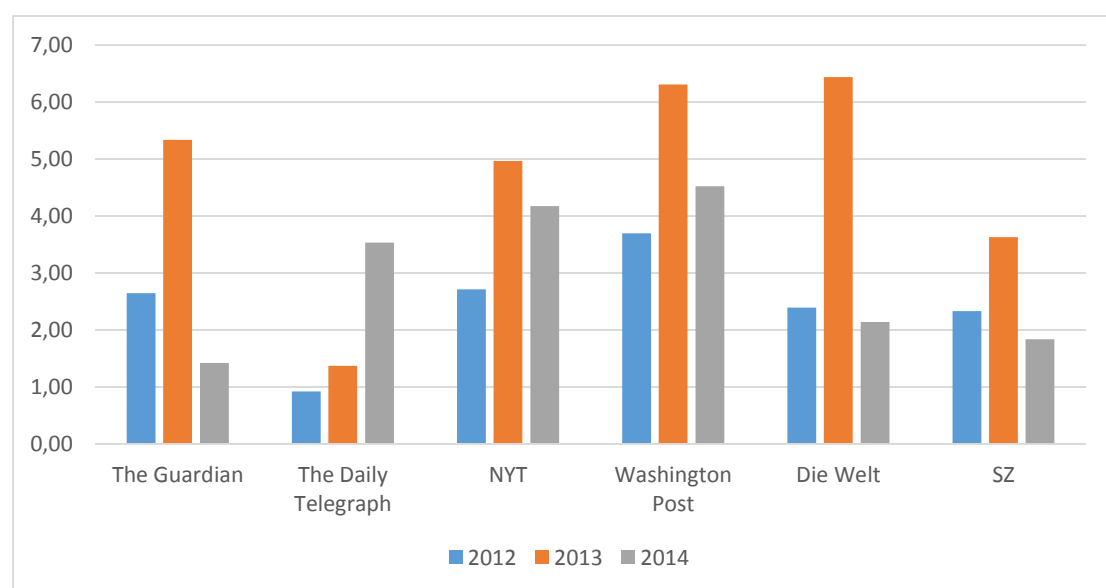


Figure 1. Relative Frequencies of news reports about privacy during 2012, 2013, 2014 Note. 2012: Daily Telegraph

N=124, Guardian N=211, NYT N=140, WP N=159, DW=72, SZ=108; 2013: Daily Telegraph N=173, Guardian N=377, NYT N=283, WP N=261, DW=193, SZ=168; 2014: Daily Telegraph N=325, Guardian N=114, NYT N=225, WP N=189, DW=121, SZ=85)

Surprising is the tendency observed for most of the newspapers and in particular for The Guardian, to reduce the amount of coverage about privacy after 2013. The only exception from this trend is Daily Telegraph. While in 2012 Telegraph had 0,92% (N=124) of its coverage devoted to privacy, in 2014 its articles reported about privacy more than twice as much compared to 2012 ($F=3,54$ N=173). Probably this is due to the fact that in 2012 the articles of all newspapers except The Daily Telegraph had a greater share of the overall reporting when compared to 2014. The trend to decrease the number of privacy reports in 2014 is present for all other newspapers, which suggests that the events in 2013 did not achieve the desired effect of more visibility when it comes to privacy topics. Of course this could be due to the glut of privacy topics experienced in 2013. Surprising however is the relative small portion of Guardian's articles discussing privacy in 2014. This is not expected since in 2013 the newspaper claimed to provide an extensive discussion about the right to privacy and the increasing surveillance. The German newspapers also decreased the number of their reports about privacy and the issue was no longer a major topic as compared to 2013. The discussions on NSA surveillance in 2014 focused much more on how to prevent surveillance from other intelligence agencies and equipping the German one with the needed finances and technology to provide a counterforce.

The analysis of the number of articles that had different topics than those defined in the categories, brings more insight about the coverage on the topic of privacy of each newspaper. Some articles discussed the economic crisis or criminal acts, which only partly fit to the purpose of this analysis and didn't enhance the discourse. Especially the US newspapers have a relative high amount of articles, covering different topics compared to the rest of the newspapers. From all 150 articles, WP had 15,33% of its reports devoted to other topics than those suggested by privacy literature. NYT covered over the three periods 13 of topics (n=150), which were not closely related to privacy. It could be assumed that US newspapers provide a great quantity of privacy coverage, however its content is not able to provide a quality discussion about privacy. The German

newspaper SZ and the UK Guardian had a very small amount of articles, which were dedicated to other topics.

The placement of the article in the newspaper could also provide insight about the news value, journalists attribute to it resp. to the topic discussed in that article. There is no tendency for any of the newspapers in the sample to place privacy-related articles on its front page. On average for all periods, all newspapers placed articles discussing privacy at the middle of the newspaper, on page 9 ($M=9$). Even in 2013 there is no significant change in the news value journalists attribute to privacy topics. In particular, it is interesting are the two UK newspapers. Guardian usually placed privacy articles on the 6 page, thus more closely to the front page, as compared to Telegraph which always placed privacy at the end of the article, on page 12. Sueddeutsche Zeitung was not included in the measurements as it did not provide insight about the placement of its articles in the print version of the newspaper.

Considering the length of the articles, US newspapers have the tendency to publicize longer reports. In particular, NYT has the longest articles, when reporting about privacy issues during all three periods of time, considered in the study (NYT: 2012:1031 words; 2013: 1669 words; 2014: 854 words). Interesting appears to be also the dramatic increase of the articles' length in NYT during 2013. A possible reason for this is the NSA scandal. However the event has such an impact on the length of the articles for none of the other newspapers. Further a tendency to extend the length of the articles, discussing privacy over time can be observed for both German newspapers and for Telegraph. A reason for this is the fact that the NSA scandal produced a wave of investigations and new revelations in Germany also in 2014. For Telegraph, as one of the paper with one of the lowest amount of articles about privacy, events could have a stronger impact on the reporting compared to the other newspapers, which produced relatively equal and high number of articles about privacy.

Topics

The main purpose of national newspapers is primarily to report about the major events of the day. Therefore it is important to examine, which aspects of privacy discussions were

emphasized during the selected timeframes. Topics will be analyzed in order to examine following hypotheses:

- H1 privacy discourse after Snowden revelations will be more concrete in comparison to the discourse in 2012, concentrated on surveillance as a formulated threat to privacy and the lack of sufficient solutions.
- H2 Because of entrenched culture of official secrecy, reports about privacy protection and privacy violations before and after the Snowden leaks will be less visible on British and US newspapers than in German.

Analysis of topics for 2012

The distribution of the topics for 2012 (Figure 2), shows that there are four mayor topics, which structure privacy debate for the six newspapers. All of the newspapers reported mostly about *surveillance and monitoring threats, national security, legacy and laws* as well as about *technology*.

The newspaper, which most frequently reported about surveillance and national security was Daily Telegraph, which has 54 % of its articles during 2012 devoted to national security issues and 66 % covering surveillance issues. Sueddeutsche Zeitung has the second largest amount of reports about *national security* (46% of its coverage). This fact is due to the large amount of articles of SZ, discussing Nazi terrorism activities in 2012 and the insufficient measures, taken by local security agencies in order to provide solutions and protection for the citizens. Figure 2 shows that surveillance and legacy are by far the most important topics for the discourse, provided by Guardian. For this newspaper the second most important topic was *surveillance and monitoring threat*. After Daily Telegraph, Guardian is the media, which most frequently discussed this topic (54% of the articles for 2012). In general the reporting style of the US newspapers appear to be similar to the European, as UK and German newspapers follow nearly the same trends. Especially relevant for the US newspapers in their reporting about privacy are *national security* topics (38% for NYT and 42% for Washington Post). None of the selected newspapers provides discussions about privacy protection measures or about the lack of sufficient solutions for privacy protection. This is due to the fact that in 2012 privacy was mostly limited to discussions about Internet as a danger because of the new forms of

communication introduced lately. In relation to this stand the discussions about Facebook privacy policies and the way Internet giants aggregate personal data on the basis of users profiles and use it for commercial purposes. There was also a considerable amount of articles dealing with trials against Facebook invasive policy towards users' private data.

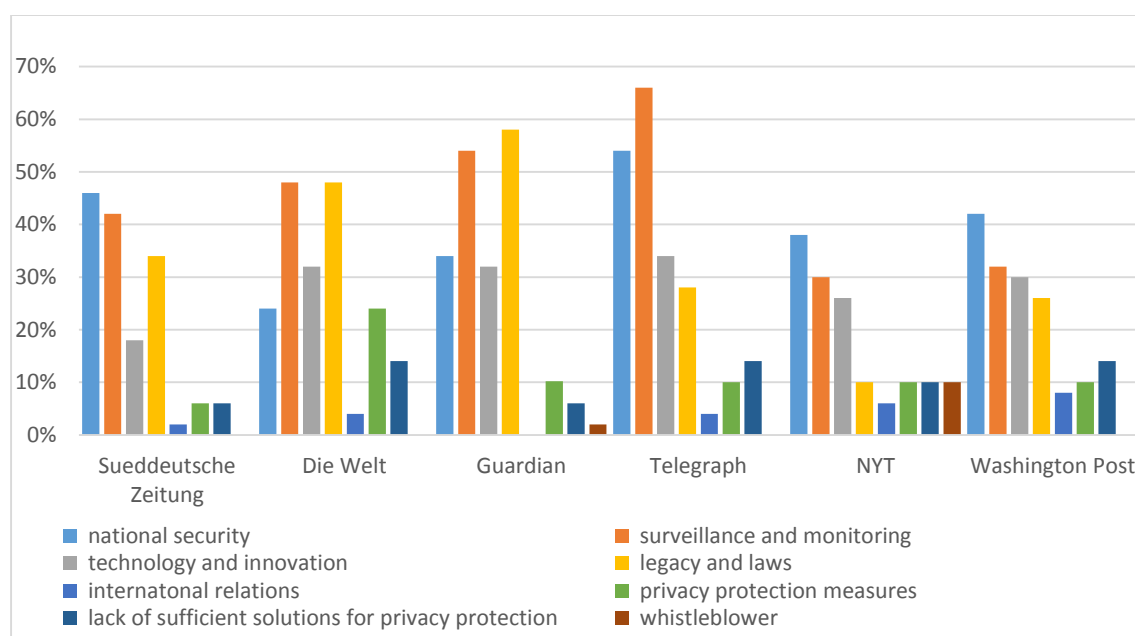


Figure 2. Distribution of topics in newspapers' coverage for 2012

Distribution of actors across privacy topics for 2012.

The distribution of actors across topics will bring more information considering how the four most frequently mentioned topics were discussed in the newspapers. For Washington Post 52% of the political elite appeared in reports covering *national security* (AF:13; n=25) and *surveillance and monitoring* (AF:13; n=25, $p=.005$). Further the topic *technology and innovation* was mainly promoted by actors from Internet companies (80% Internet giants, AF:8, n=10, $p<.001$). This is also true for NYT (AF:5, n=5, $p=.007$). For NYT *national security* topics were presented by NSA actors (100%, n=4, $p=.017$), whereas in WP they were connected to security actors.

The Daily Telegraph associated 52% (AF:13, n=16, $p=.005$) of the US politicians with surveillance and monitoring activities. This confirms the usually supportive role of the newspaper toward UK political actors and implies a hidden critique on their American partners. Further 80% of all Internet giants appear in articles covering technology and

innovation (AF:8, n=15, $p<.001$). Again the topic legacy and laws is constituted mainly from legal experts (AF:11, n=13, $p<.001$). There are no significant differences in the reporting strategies, applied by Guardian in 2012. 68,8% from the actors Internet giants appear in topics about technology and innovation (AF:11, n=16, $p<.001$). Security actors are equally present in national security topics (81,3%, AF:13, N=16, $p<.001$) and articles discussing legacy and laws (81,3%, AF:13, N=16, $p=.032$).

The results for Sueddeutsche Zeitung are slightly different, having 90% from all terrorists actors mentioned in *national security* topics (AF:9, n=10, $p=.003$). The problem about terroristic network's actions appears to define the privacy debate in 2012. Further Internet users are also clearly connected to legal trials about privacy, present up to 75,4% in this topic (AF:5, n=7, $p=.024$). Reason for this could be the ACTA debate, which was extensively covered by the German media also in 2012. The topic *legacy and laws* was determined by a strong presence of German officials (52,4%, AF:11, n=21, $p=.033$) and legal experts (57,1% AF:8, n=14, $p=.047$), which results from the highly controversial discussions of the Registration Law in Germany at that time. Die Welt concentrates much more on the topic of technology, when discussing privacy and provides significant results for the link between Internet users and the topic *technology* (66,7%, AF:8, n=12, $p=.010$). The critique debate formed around the newly revisited Registration Law is present also in Die Welt, which connects German officials with the topic about profiling and data selling (42,9%, AF:12, n=28, $p=.002$).

Analysis of topics for 2013

The debate in 2013 was concentrated on surveillance and monitoring for all of the newspapers (s. Figure 3). Unlike the public debate in 2012, the discussions in 2013 are connected to concrete events of surveillance and privacy violations. Differences in the newspapers appear in the second most important topic in privacy coverage. For SZ after surveillance, the second most discussed themes are national security 44% and international relations 40%. This is due to the fact that NSA scandal has broken the trust between Germany and US, countries aligned in the battle against terrorism. It is also reasonable for the topic of surveillance to go hand in hand with discussions about national security, as monitoring threat depends on the relation between the security of the nation

and personal freedom. Compared to SZ, Die Welt was covered legal consequences from the surveillance scandal much more extensive. More than half of the articles, discussed legacy and laws. Die Welt is much more critical towards the US governmental authorities for allowing such actions and reflects the threats from German politicians to take legal actions. The UK newspaper Guardian creates almost the same picture of privacy, with the exception that in its coverage whistleblowing activities also shape privacy discussions in 2013 (46%). The rest of the newspapers provide identical debate, having whistleblowing as the second most important issue in 2013. The difference between German newspapers and the rest of the group concerning the topic whistleblowing could be due to the fact that Germany and German governmental authorities try to distance themselves from Snowden in order to avoid unpleasant discussions about their refusal to accept his asylum request.

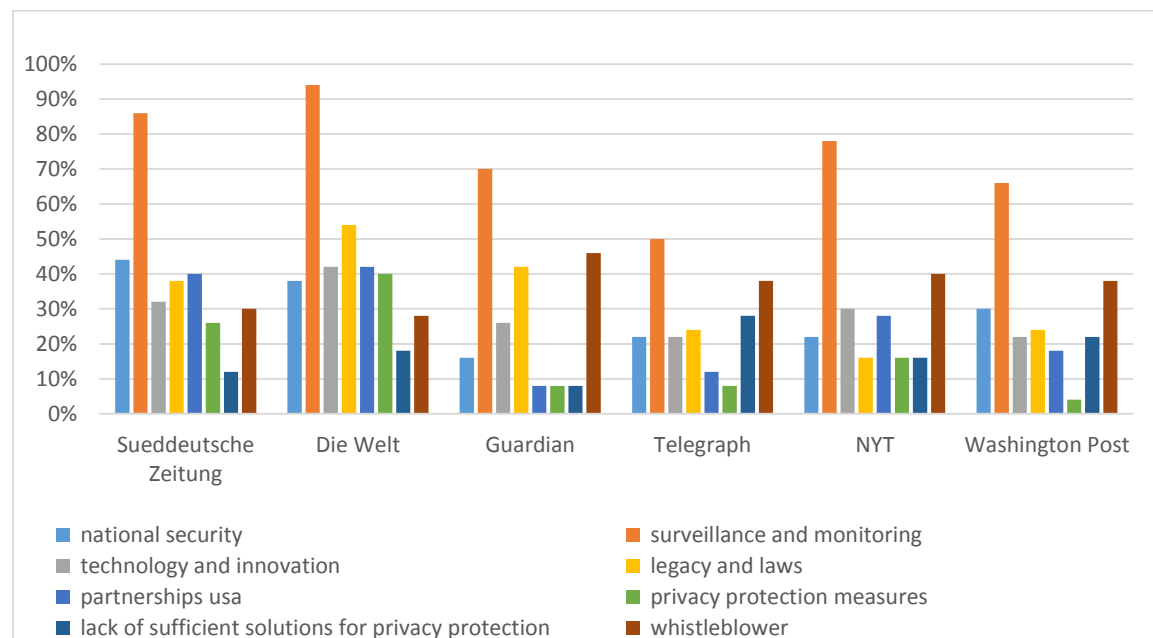


Figure 3, Distribution of topics connected to privacy in newspapers' coverage for July 2013

Distribution of actors across privacy topics for 2013.

The distributions of actors are in line with the results from the frequencies analysis. Washington Post links US political elite (AF:29, n=37, p=.005) and NSA (AF:20, n=20, p<.001) to the topic *surveillance and monitoring*. Further 56% from the foreign governmental authorities appear in articles discussing international relations (AF:5, n=9, p=.005), because the NSA scandal challenged the relations of the US with its allies. Its counterpart NYT delivers also significant results in terms of whistleblowing activities.

Especially foreign politicians (AF:9, n=14, p=.052) and whistleblower themselves (AF:17, n=31, p=.008) were connected to topics about whistleblowing actions. In addition NYT discussed 80% Russian politicians in topics concerning whistleblowing (AF:12, n=15, p<.001), which is normal due to the position of Russia in this scandal. Like Washington Post, the newspaper linked NSA to the topic surveillance and monitoring (AF:21, n=23, p=.046).

Both German newspapers discussed US politicians, connecting them to international relations (SZ: AF:22, n=15, p<.001, DW: AF:14, n=20, p=.001). Die Welt also linked 100% of US governmental authorities to the topic whistleblowing (n=20, p=.009). Even though both newspapers reported evenly about whistleblowing activities, only Die Welt delivers significant results, connecting 69% of the whistleblowers to international relations (AF:11, n=16, p=.014). While SZ discusses NSA actors in articles about surveillance, Die Welt links 50% of the NSA¹ actors to national security issues (n=30, p=.041). SZ linked 63% of the German politicians to topic international relations (AF:17, n=27, p<.001), as the scandal damaged the relationship between US and German political authorities. In SZ 67% of the BND² actors were also incorporated in the dialog about international relations (AF:8, n=16, p=.048).

The Guardian reported in the same manner as its German counterparts, linking 66% of US politicians to articles discussing whistleblowing (AF:21, n=32, p<.001). Further 97% of the NSA (AF:25, n=26, p<.001) and 100% of GCHQ actors (n=8, p=.044) appeared in topics about surveillance and monitoring. Telegraph on the other hand, as a more supportive of the UK government, did not mention GCHQ³, when reporting about surveillance, even though Snowden documents revealed a close partnership between both security agencies. Whereas Guardian linked UK politicians to topic legacy and laws (AF:9, n=13, p=.027), the Telegraph connects privacy regulations to transnational institutions (AF:7, n=9, p<.001).

¹ NSA - National Security Agency

² BND – Bundesnachrichtendienst (German intelligence agency)

³ GCHQ - UK Government Communications Headquarters

Analysis of topics for 2014

In 2014 there are fewer articles dealing with the topics of national security among all newspapers with the exception of both German newspapers (s. Figure 4), which still remain concerned with national security issues. **H1 suggests that surveillance topics will become more important for the newspapers in 2014 compared to 2012.** This is true especially for Guardian, which has 72% of its articles dealing with monitoring issues. Die Welt also experienced an about 30% increase in its surveillance coverage compared to 2012. Only Telegraph is the exception from this tendency. In comparison to 2012, when almost 66% of its articles dealt with surveillance, in 2014 the newspaper decreases surveillance coverage with 20%. Compared to 2012 topics about the lack of sufficient solutions and privacy protection increased among all newspapers. In 2014 concerns about the undeveloped legal basis for the regulation of privacy became as important for newspapers as topics about technology, especially for Guardian, which has 48% of its articles covering the topic. Washington Post (38%), Die Welt (30%) and Telegraph (34%) experience also an increase in the discussions about the lack of legal solution to protect privacy.

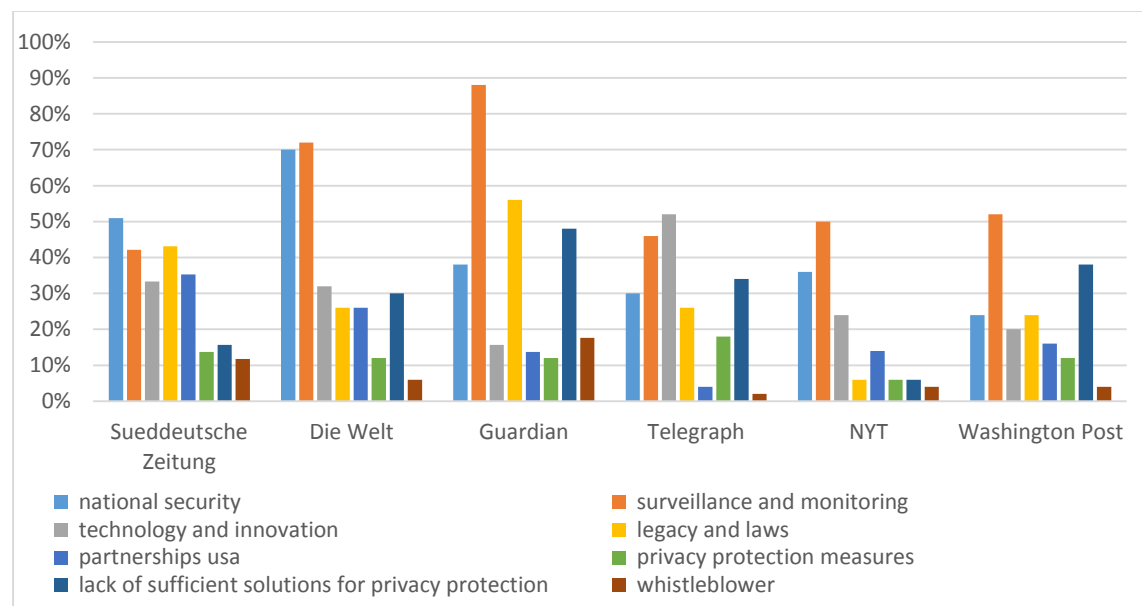


Figure 4. Distribution of topics in newspapers' coverage for 2014

In sum, the debate in 2014 includes more topics and is mainly concentrated on surveillance, national security and the lack of privacy legislation. These tendencies

support the H1, which assumes that privacy discourse after Snowden revelations will be concentrated on surveillance as a formulated threat to privacy and the lack of sufficient solutions. Nodal points in the 2014 debate are surveillance, national security and legislation. They are closely linked, because an increasing surveillance neglects privacy and leads to a rather negative articulating about legislation. H1 is confirmed by the results for all newspapers except for The Telegraph and NYT. For Telegraph the assumed tendency was verified only for an increasing reporting about the *topic lack of sufficient solutions*. For NYT the reversed trend can be observed, as the newspaper reduces its reporting about insufficient regulations by 4% and increases at the same time the coverage about surveillance by 20%. This could be due to the fact that in comparison to the UK, Snowden revelations encouraged a huge discussions in the US, also on a governmental level and have almost changed the Espionage Act. For Sueddeutsche Zeitung the hypothesis is verified with a remark on the very small increase in the reporting about surveillance.

H2 assumes that the entrenched culture of official secrecy in US and UK will reduce reports about privacy protection and privacy violations before and after the Snowden leaks. LexisNexis search engine reveals that German newspapers have in general more coverage about privacy protection compared to the selected US and UK newspapers (2012: US-2, UK-1, GE-50; 2014: US-9, UK-2, GE-50). On the other hand, American and British newspapers reported more about surveillance than German ones (2012: US-121, UK-111, GE-40; 2013: US-9, UK-2, GE-50). However, because the keywords for German and English newspapers don't overlap to 100%, these results cannot be a credible basis for the comparison. Therefore the paper uses the distribution of topics during the years in order to compare the coverage of the newspapers. The hypothesis is confirmed only for the comparison between German and US newspapers. In 2012 German newspapers have more reports about the topic of privacy violations compared to Washington Post and NYT (SZ 42%, DW 48,0% WP 30% NYT 32%). Regarding the topic *privacy protection measures*, Die Welt has covered the topic more extensively than NYT and WP (SZ 6%, DW 24% WP 10% NYT 10%). For the coverage in 2014, German newspapers reported on average just slightly more about privacy protection measures than American newspapers (SZ 14% DW 12% WP 6% NYT 12%). Regarding *privacy violations* the hypothesis is confirmed only for Die Welt, which has 20% more coverage about such issues than the US newspapers (NYT 46% WP 50%). To sum it up H4 is only

partly confirmed in particular for the relations between the German newspaper Die Welt and the US newspapers. However the results suggest that there is a trend for German newspapers to report slightly more about privacy protection and privacy violations than their US counterparts.

Distribution of actors across privacy topics for 2014

For both US newspapers more than half of all actors foreign politicians were connected to national security issues (Washington Post 80% (n=5, p=.009), NYT 64% (n=18, p=.031). This is mainly because of the unfolding Ukraine crisis and the strong involvement of the US in the conflict. Similar to 2012 privacy discourse, Internet gains and Internet users were mostly discussed in technology and innovation topics. NYT discussed Internet user also mainly in articles about technology (AF:6, n=16, p=.009), however there is also a clear tendency to link Internet user with the lack of sufficient solutions (AF:5, n=16, p=.030). This fact marks a small shift in media reporting towards the need to protect user's interests in the unbalanced relationship between citizen and technological companies. Further Washington Post discussed intelligence agencies always (NSA 100%) in topics about surveillance and monitoring issues (n=15, p<.001), for NYT this was also the case (AF:19, n=25, p=.051). The German intelligence BND was also always present in WP articles about surveillance (100%, n=5, p=.051).

German newspapers connected intelligence actors with up to 100% to surveillance and monitoring topics (DW: NSA n=18, p<.001, SZ: NSA n=16, p=.002). The more liberal German newspaper SZ linked BND also to international relations topics (80%, AF:9, n=11, p<.001), which is due to the conflict, created by the revelation of US spies inside BND. Considering the coverage of SZ, 75% of the US politicians (AF: 12, n=16, p<.001) and most of the German politicians (AF:11, n=14, p<.001) were present in articles, discussing international relations. Die Welt connected US politicians not only to international relations topics (AF:13, n=18, p=.056), but discussed their actions also in articles about surveillance (AF:16, n=18, p=.056). German politicians were discussed by journalists from Die Welt in articles about surveillance and monitoring (89%, AF:25, n=28, p=.004). Half of the US politicians and of the NSA actors were present also in topics about the lack of sufficient solutions (US pol: AF:9, n=18, p=.028, NSA: AF:8,

N=16, $p=.049$). SZ discussed 86% of the whistleblowers connecting them to surveillance (AF:6, $n=7$, $p=.045$).

UK newspapers were not so consistent considering the distribution of actors in the topics. Telegraph discussed 62% of the US politicians in national security (AF:5, $n=8$, $p=.043$) and surveillance (AF:5, $n=8$, $p=.043$) topics. The analysis provided significant results for the distribution of actors from transnational institutions, who appeared when discussing the lack of sufficient solutions for privacy protection (AF:6, $n=9$, $p=.047$) and legacy and laws (AF:7, $n=9$, $p<.001$). The Guardian is the only newspaper to have significant results for the distribution of civil society actors. 71% of the civil society was present in surveillance topics (AF:15, $n=21$, $p=.015$). Remarkable is the fact that NGOs shape the discussions about the lack of privacy protection laws (AF:6, $n=7$, $p=.042$). Further 62% of the UK politicians were connected by the newspaper to the topic *lack of sufficient solutions* (AF:18, $n=29$, $p=.023$). The Guardian is also the only newspaper providing significant results about the distribution of whistleblower actors in topics, discussing whistleblowing activities (AF:8, $n=12$, $p=.001$). GCHQ actors appear mostly in national security (AF:6, $n=8$, $p=.040$) topics.

Framing

All frame elements that have occurred in total in more than 5% of the reports of each newspaper were included in the hierarchical cluster analysis. The selection was applied in order to obtain meaningful results. Frames will be analyzed in order to answer following research questions:

RQ1 Which frames shape the privacy discourse before, during and after the NSA Scandal?

RQ2 How does framing of privacy issues differ between different countries and media cultures?

RQ3 In what ways do newspapers frames differ in covering privacy issues?

Privacy discourse in 2012

Washington Post

The coverage of Washington Post was divided into three clusters using hierarchical cluster analysis. These clusters are specific combinations of content characteristics and reflect the framing used by the newspaper in its coverage on the topic of privacy. The first cluster is characterized by problematical national security and thus is labeled as **National Security** frame. It includes 37% of the reports about privacy, publicized by Washington Post in 2012. This frame is very consistent, since it includes national security as problem and as a cause, as well as surveillance will improve security as treatment. Its statement is clear – we need more monitoring, because it will keep us safe and prevent criminal acts. This frame supports monitoring and surveillance actions and views them as the only way to secure the state. The second frame of WP is called **Privacy Online** and is concerned in 100% of its cases with the problem of regulating privacy online. It is however the smallest cluster of WP and contains only 14% of its reports. Also three out of four cases in this frame view technological development and Internet as a challenge for privacy legislation. The third frame revealed by the cluster analysis is called **Surveillance friendly legislation**. It states that the government favors surveillance friendly legislation and includes 32% of the articles of WP for 2012. More than the half of the included cases problematize the acceptance of surveillance by the government and call for improvements in privacy legislation. The second problem, connected to surveillance legislation, is the growing monitoring, mentioned by 47% of the included cases.

As next should be considered, how frequently frames occur in the different topics. Many studies, which investigate framing, assign frames to specific topics prior to the survey, so that a topic is an indicator of a specific frame. In this study, the theme was not used as an indicator for frames, because frames were found through the clusters of individual elements. At this point, it should only be determined which topic use which frames. Figure 5 shows that the **National Security** frame characterizes the coverage about the methods that the government uses to protect state and its citizens against all kind of crises like terrorism or national disasters. 83% of the coverage, assigned to the topic national security was framed by the National Security-Frame.

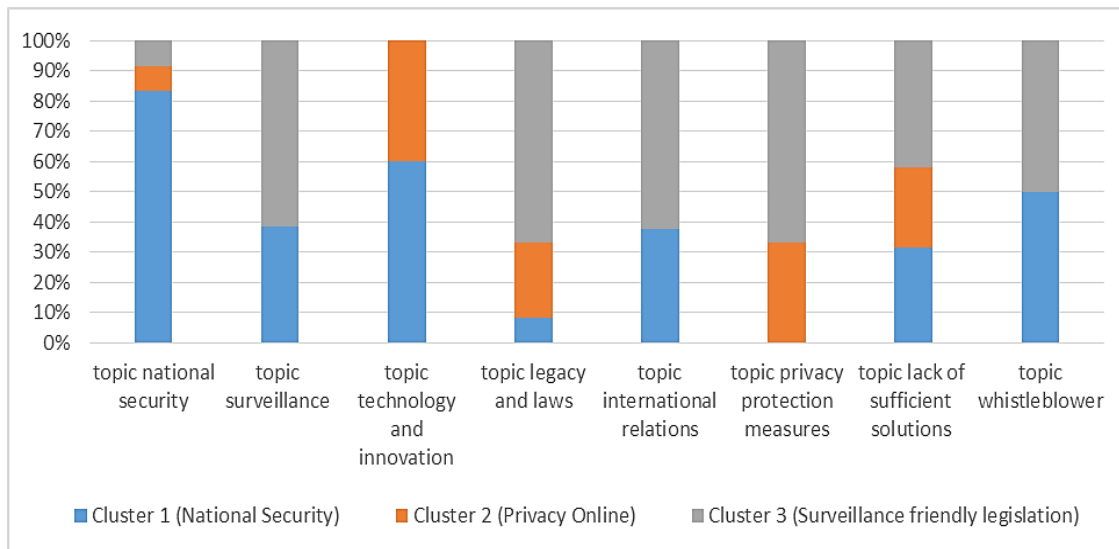


Figure 5. Washington Post: Distribution of topics according to the frames 2012.

Interesting appears also that 60% of the articles with topic technology and innovation were assigned to this frame. The rest was characterized by the second frame, called **Privacy Online**. The second cluster also encompasses reports about privacy protection measures. It could be assumed that most of the suggested protection techniques related to technology and privacy in an online context. The third frame is a clear example of how different topics can have multiple frames. In more than 60% of the reporting about the topics of surveillance and monitoring, WP applied the **Surveillance friendly legislation** frame. It is also not a coincidence that 67% of the topics about legacy also used this frame. Compared to the other clusters, this was the one that most frequently framed reports on the topic about the lack of sufficient solutions for privacy protection.

Which actors transported the frames? Figure 6 provides more information about this. The National security frame is dominated by foreign governmental authorities, making it clear that there is a foreign threat (70%, AF:7 N=10). The second frame was dominated by Internet user with up to 86% (AF=6 N=7) and included 80% (AF:8, N=10) of the Internet giants. This points out the two mayor players in the unregulated field of online communications. The third cluster is equally dominated by the US government (AF:13 N=25), legal experts (AF:10 N=18) and NSA actors (AF:4 N=7). This replicates exactly the actors, which are involved in the process of promoting surveillance friendly legislation.

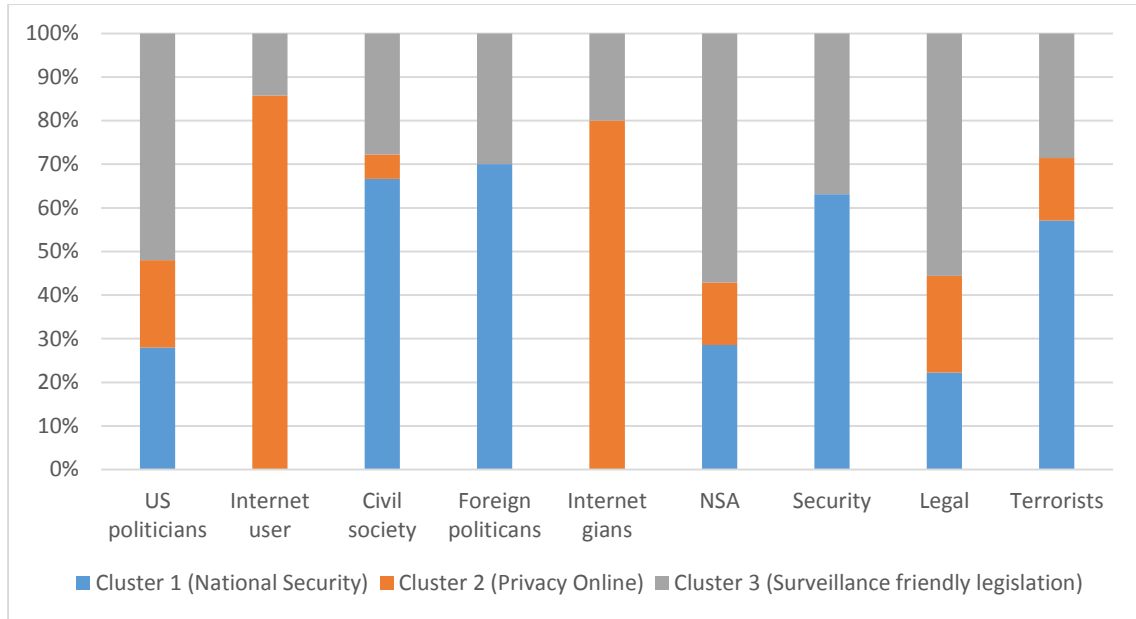


Figure 6. Washington Post: Distribution of actors according to the frames for 2012.

New York Times

The coverage of NYT consists also of three clusters. The first extracted frame is called **Technological development** and includes 64% of the reports on the topic of privacy. This cluster names technology in more than a half of its cases as the reason for privacy intrusions. The problems, which are included in the frame, are Complicated regulation of privacy online, Monitoring/surveillance threat and Data saving, identified in almost 30% of the articles for 2012. The second frame is called **Better privacy legislation** and is concentrated on solutions to current privacy problems. It is the second largest cluster in the analysis and consists of 20% of the articles from NYT. The newspaper identifies a clear problem in this frame, which is connected to power misuse by governmental authorities and security agencies. 70% of the included cases criticize the illegal measures, used by politicians to support of surveillance. Unlike WP the smallest cluster in the solution for NYT is called **National security**. It again suggest in 100% of the included 8 articles that national security has to be enhanced. The solution goes again via surveillance (90% of the cases). This frame includes also a clear evaluation in more than the half of the articles. It states that surveillance is the only way to keep citizens safe.

Figure 7 shows that the distribution of the topics according to the identified frames is in line with the interpretation of clusters. The first frame **Technological development** is used in 60% of the articles reporting about technology and innovation. So in the reports

about technology, NYT mainly views technology as creator of problems for people's privacy and not as a solution. Remarkable is that all of the topics, which discuss the lack of sufficient solutions for privacy protection, are framed, using **Technological development** frame.

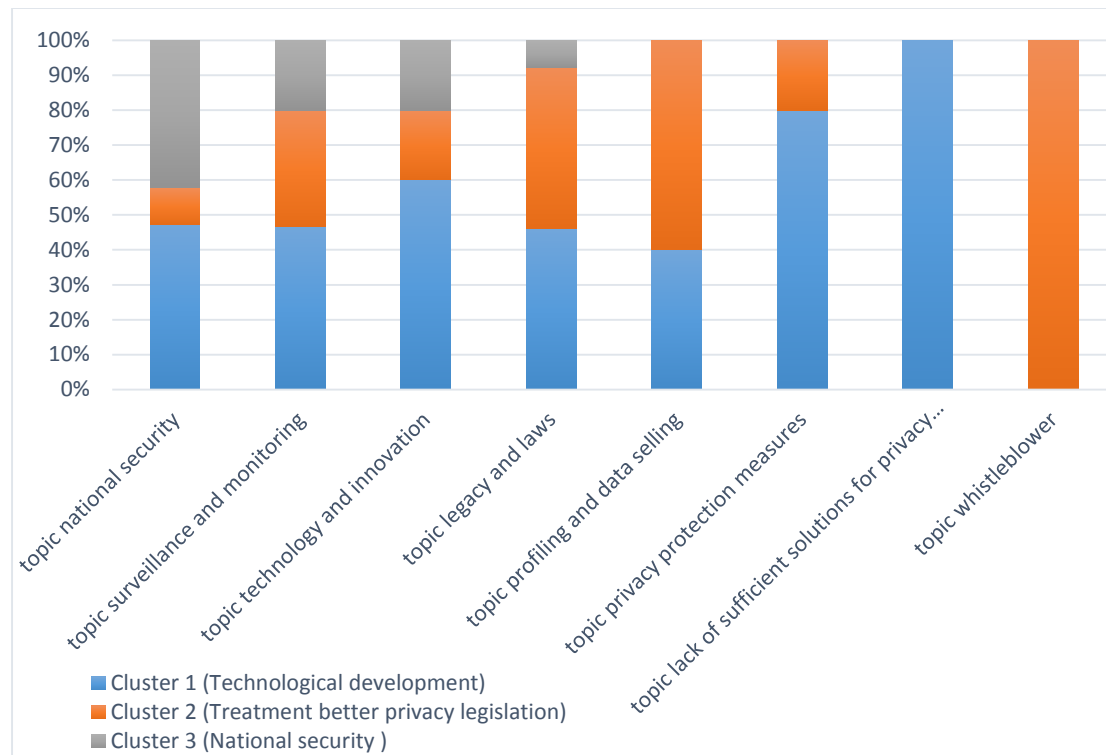


Figure 7. New York Times: Distribution of topics according to the frames for 2012.

The distribution for the next cluster is almost the same, however this time all of the reports discussing whistleblowing were framed, using the need for **Better privacy legislation**. This frame was used also in 60% of the articles discussing profiling and data legislation. It suggests that the problem could be solved by improving the regulations. The third cluster was used by 42% of the articles, which report about national security issues. The frame was somewhat present also in articles, discussing surveillance and technology.

Figure 8 shows that the main actors, who promoted the first frame of NYT are NGOs (AF:4 N=5) and Internet giants (AF:4 N=5). However it is possible that these actors had different reasons to support it. Whereas NGOs like Privacy International, could criticize Internet giants for their unclear and misleading privacy policies, Internet giants could explain themselves pointing out to users' ignorance of privacy policies and their sharing

behavior. In particular whistleblower (AF:5 N=6) and legal experts (AF:6 N=7) were the one, who called for better privacy legislation in the articles of NYT (s. Figure II, Anhang). The second frame was supported by 86% of the legal experts and 83% of the whistleblower. The **National security frame** was supported in the articles by 33% of foreign politicians (AF:2 N=6) and one fourth of the security actors (AF:4 N=16).

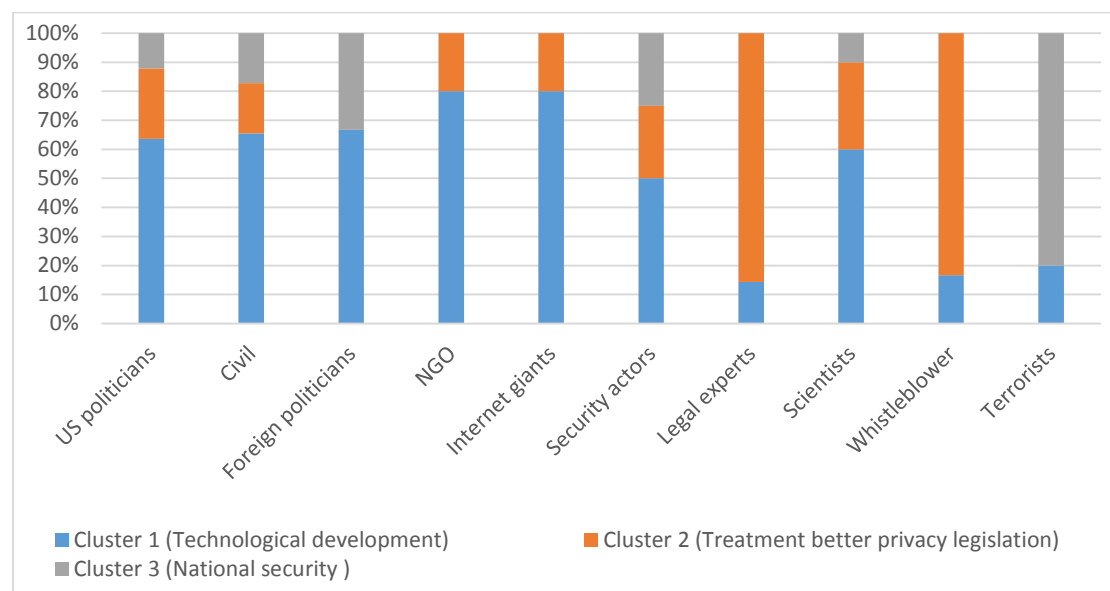


Figure 8. New York Times: distribution of actors in the clusters for 2012

Sueddeutsche Zeitung

The cluster analysis of the articles of Sueddeutsche Zeitung for 2012 revealed a three cluster solution. The first two frames are equally present in the coverage of the German newspaper. Both include 42% of the articles. The last cluster is somewhat smaller and consists of 16% of the reporting. The first cluster is called **Technology allows companies to invade our privacy**. It is different from the discussed frames by now, since it includes 38% of the cases, which discuss privacy infringements by companies and at the same time has 38% of the reports, which define technological development as a danger for privacy. The interpretability of the solution is not hampered, because these two elements also appeared to be strongly in previous privacy research (Fornaciari, 2014). The second cluster is called **National security** and comprises 100% of the cases, which define security as a problem. The frame also points out that privacy has to be reduced in favor to fight criminal activity. The last frame is connected to **Surveillance friendly** legislation and encompasses 88% of the articles, discussing government favoring of surveillance

friendly legislation. Closely connected to this is the fact that three out of four articles in the clusters, view the acceptance of surveillance by the society as a problematical for privacy.

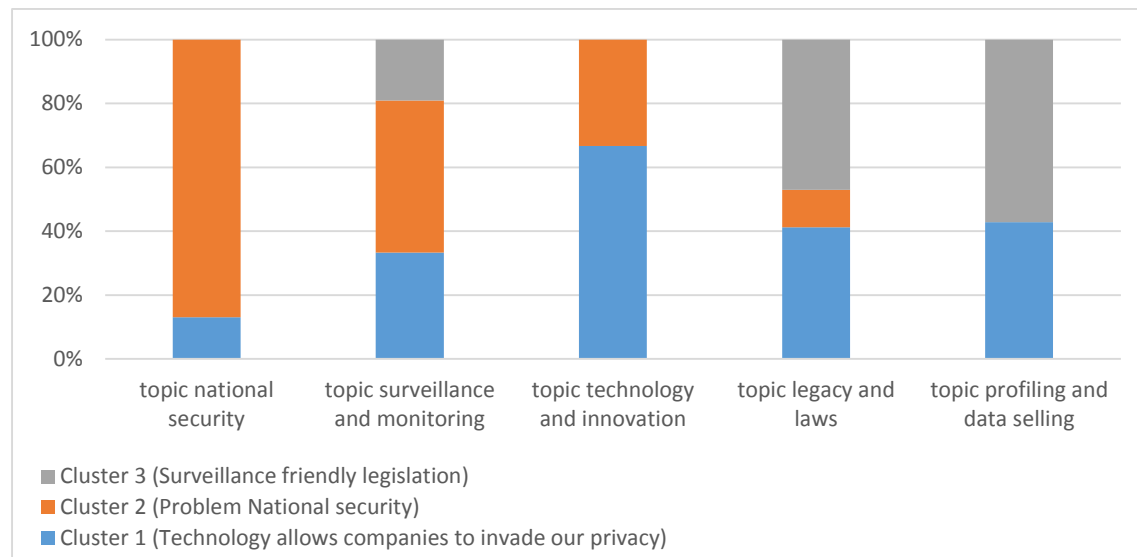


Figure 9. Sueddeutsche Zeitung: Distribution of topics according to the frames for 2012.

The distribution of the topics according to the three clusters is shown on Figure 9. The frame- **Technology allows companies to invade our privacy**, is used by 67% of the articles, discussing technology and innovation and 43% of articles about profiling and data selling. The second cluster is used almost always (87%), when reporting about national security issues and in half (48%) of the articles, which used the topic *surveillance and monitoring*. The smallest cluster from the solution reflected the problematical legal situation with laws, which support surveillance and compromise privacy. Therefore it framed articles, which reported about legacy and laws (47%), as well as about profiling and data selling (57%).

Naturally the first frame consists of 86% of the Internet giants (AF:6 N=7) mentioned in the articles of SZ (Fig.10). However this frame was also promoted by actors from half of the civil society and 71% of the Internet user (AF:5 N:7). In the case of SZ this points to articles, discussing the revisited Registration Law. The modifications it allowed data collection to occur also offline for all citizens that did not claim explicitly that they don't want their data to be redirected to third persons. The second frame- **National security**, has been promoted by all of the BND actors (AF:6 N:6) and 60% (AF:6 N:10) of the

security actors. Part of the **Surveillance friendly legislation** frame were 38% (AF:8 N:21) of the German politicians and 29% (AF:2 N:7) of the Internet user. This frame blames governmental authorities for allowing spying on the Internet user.

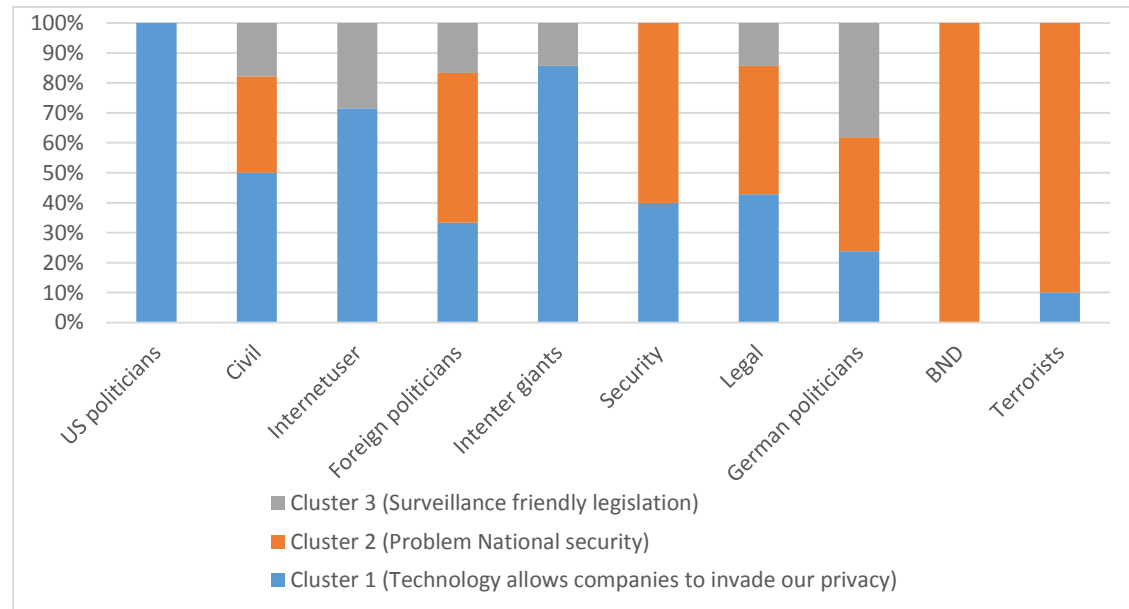


Figure 10. Sueddeutsche Zeitung: distribution of actors across the frames for 2012.

Die Welt

The cluster analysis gives us two frames for the coverage of Die Welt about privacy in 2012. The articles are formed around one bigger cluster, containing 74% of the cases and one smaller, which consists of 26% of reports. The first frame is called **Technological development endangers privacy** and includes the frame elements Problem technological development and Cause technological development in equal proportions (43%). This is due to the close connection between the use of certain technology like SNS and technological development, because new forms of communication encourage people to share more personal information and allow new intelligent forms of surveillance. The second frame is called **Politicians and legislators promote surveillance friendly legislation**. This is the only frame constituted mainly from a moral evaluation element. It includes 92% of the cases, which promote such an evaluation and again the same number of articles, which name surveillance friendly legislation as creator of problems. Important is also to mention that this frame makes a very clear statement as it includes very identical frame elements. The cluster includes also 90% of the cases, discussing data selling. It

could be assumed that this is the problem, created by laws, which protect surveillance activities.

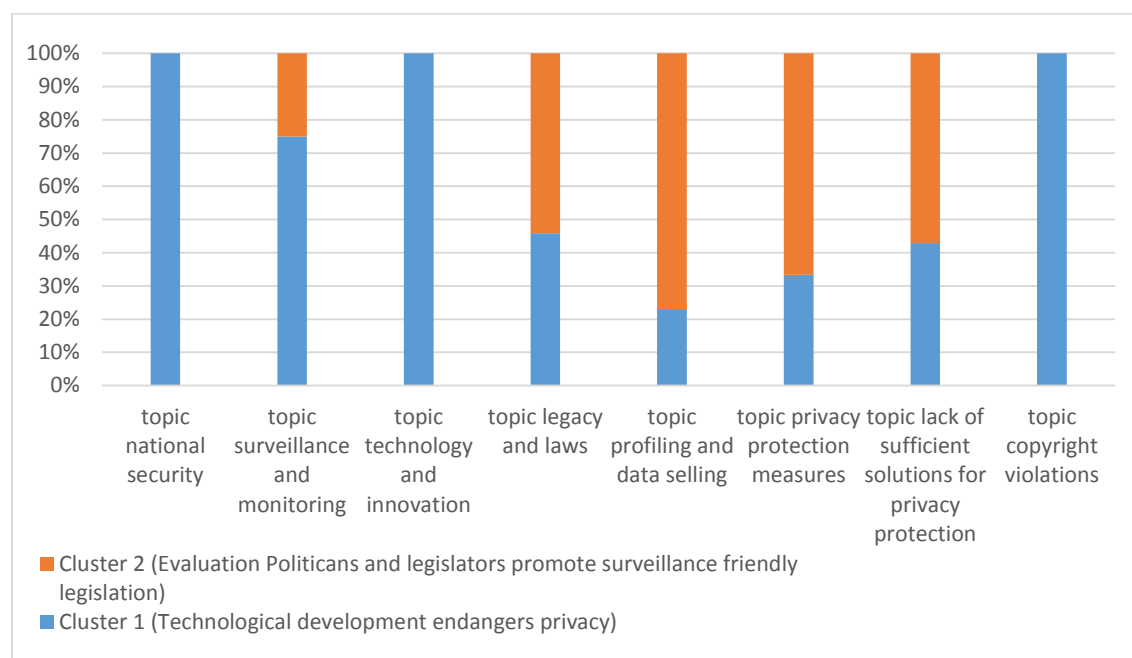


Figure 11. Die Welt: Distribution of topics according to the frames for 2012.

The distribution of topics brings more insight about the structure of the identified frames (Figure 11). The first cluster framed all of the articles, which discussed national security, technology and copyright violations. The second frame was used in 57% of the topics about the lack of legal solutions and 77% of topics about profiling and data selling. The fact that the first frame was found mostly in articles reporting about national security, increase the probability that technology was the creator of security problems. The second cluster, which reports about politicians favoring surveillance friendly legislation also frames 67% of the articles about privacy protection measures. This means, the newspaper often provided information about protection techniques, when criticizing privacy legislation.

Both frames were transported by different actors as Figure 12 presents. The first more technological frame consisted of 100% of the Internet user (AF:12 N=12) but also 86 % of the Internet giants (AF:12 N=14). The second cluster was dominated by German politicians, which makes the decision to name the cluster after the frame element - moral evaluation and not after the cause more reasonable.

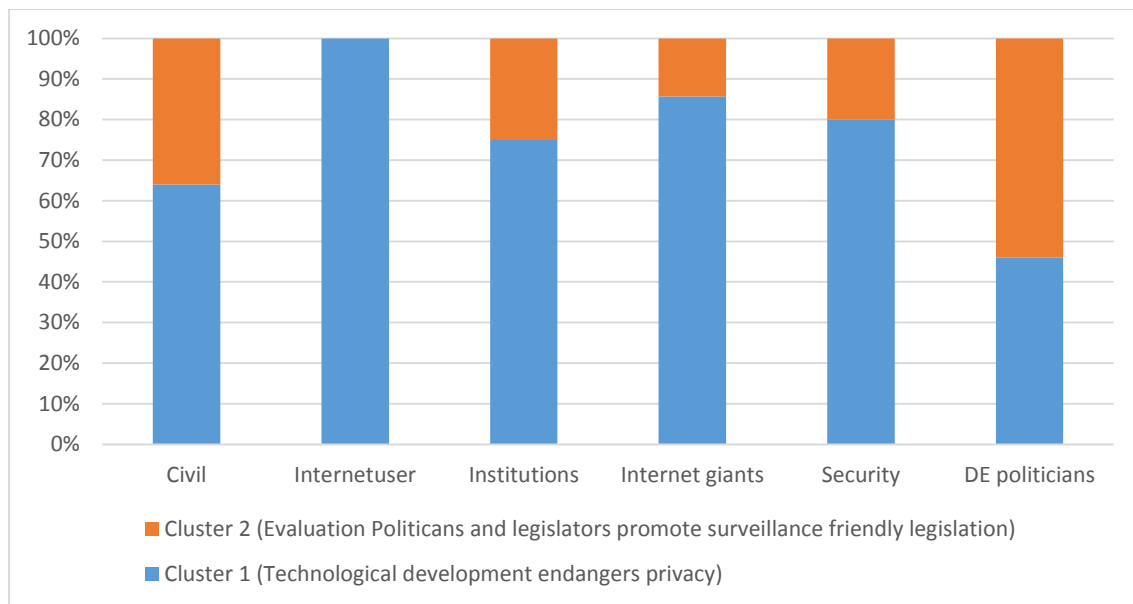


Figure 12. *Die Welt*: distribution of actors according to the frames in 2012.

The Daily Telegraph

The cluster analysis of the coverage of Telegraph about privacy issues in 2012 revealed three frames. All of these frames include almost the same amount of articles. The biggest cluster is called **National Security** and includes 42% of the cases. The interpretation of this frame goes again in direction – surveillance will improve security, since this element includes 29% of the cases and is the most important after Problem national security. Like other frames about security, this also points out that privacy has to be reduced in favor to fight criminal activity in 24% of the cases. The second cluster is focused on the **Complicated regulation of online privacy** and includes all of the articles, which recognized the legislation of online privacy as problematical. It consists of 24% of the analyzed articles for 2012. Three out of four cases saw technology as a danger and 83% defined Internet as a major challenge for the legislation. The third cluster is called **Surveillance friendly legislation**, because it includes 34% of the cases, discussing this topic. This frame is very consistent in its statement, as it defines legislation as a cause for privacy problems and therefore suggests in almost half of the included cases a solution to improve current privacy laws (47%). This cluster defines two major problems, caused by surveillance legislation- the acceptance of surveillance in 53% of the articles and monitoring threat from security agencies in 47% of the cases.

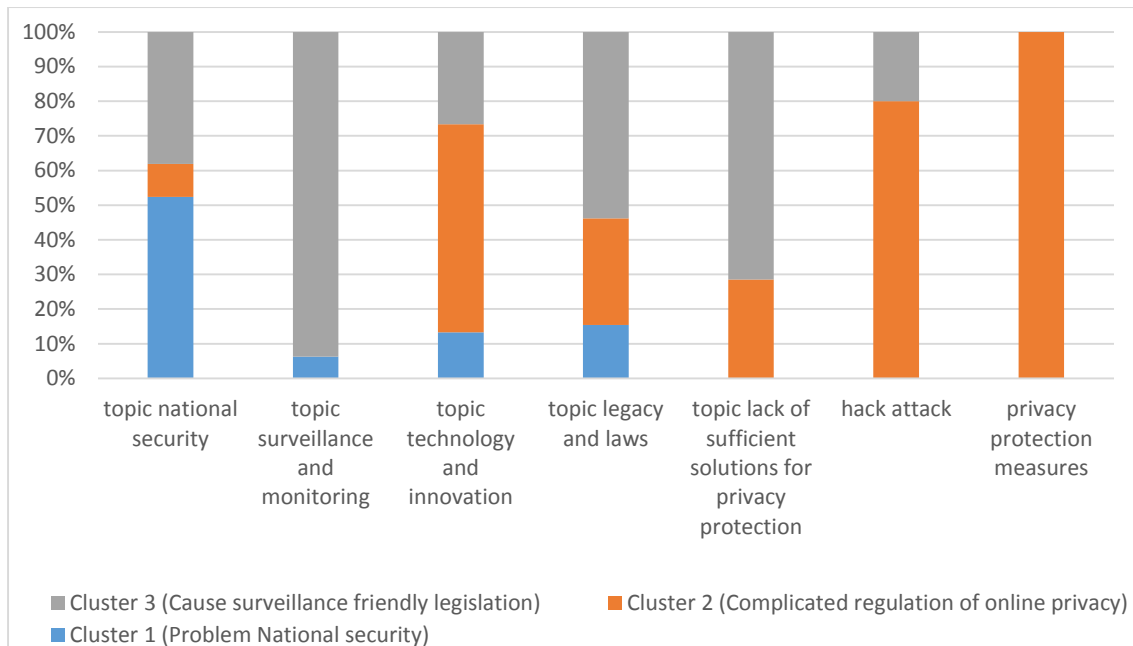


Figure 13. Daily Telegraph: Distribution of topics according to the frames for 2012.

Figure 13 provides more insight about which articles used which frames, when reporting about privacy. Articles, discussing national security were usually framed using the first cluster. All of the articles discussing privacy protection measures were framed using the second cluster. This means that suggestions or actions to protect privacy concerned mostly the online privacy and were not connected to surveillance or national security. In 80% of the cases when the newspaper reported about hack attacks they were connected to problems to regulate online privacy. The frame surveillance friendly legislation is mostly used in discussion about the insufficient legislation (71% of the cases). Consequently this frame could be also found in more than a half of the reports about legal procedures and laws.

The actors, who shaped the first frame of the newspapers were civil society and foreign governmental authorities (Fig.14). This frame reflects domestic and foreign conflicts in particular connected to the battle against terrorism. This confirms also the strong presence of terrorist and terror organizations (AF:4 N=7) in the frame. The second cluster was promoted mostly by Internet giants (AF:8 N=10) and Internet users (AF:6 N=7). However, it is possible that these two groups represent different positions in this frame. Internet giants could be seen as the trigger of the conflict and face legal charges, whereas Internet users are the victims in this unbalanced relationship. The third frame accuses legal experts (AF:10 N=18) and political actors (AF:13 N=25) of promoting surveillance

friendly legislation. 57% of the NSA actors (AF:4 N=7) are also present in the frame, forming the triangle responsible for this situation.

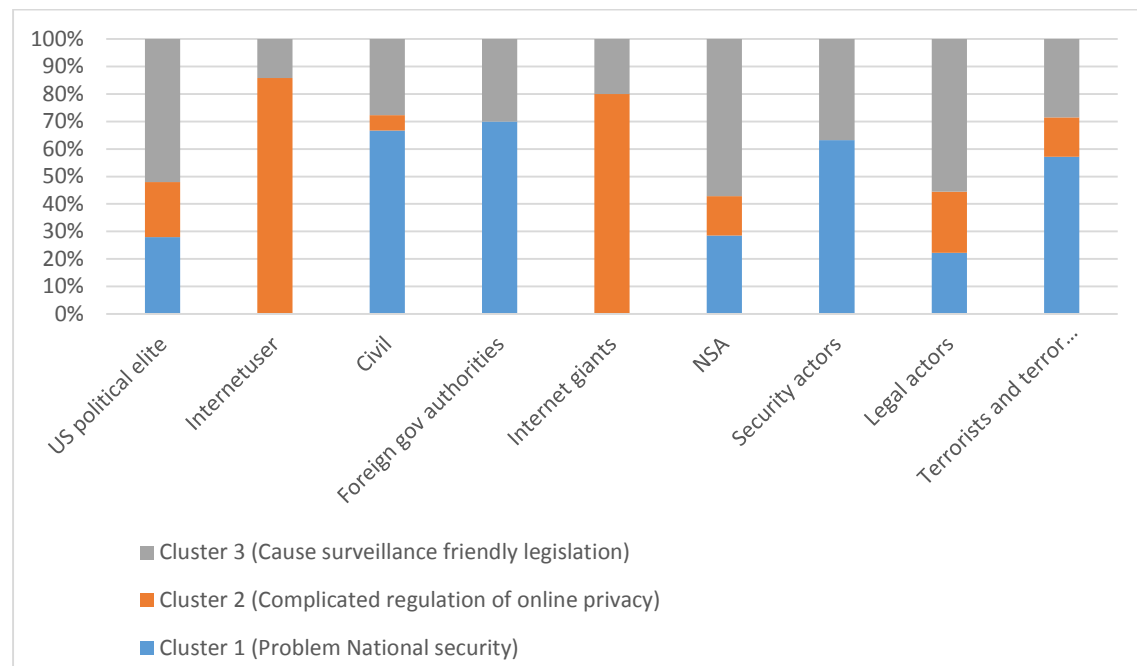


Figure 14. The Daily Telegraph: distribution of actors in the clusters for 2012

The Guardian

The analysis of framing for this newspaper results in three cluster solution. The three cluster include almost the same amount of cases. The biggest cluster includes 50% of the articles which address the **monitoring/surveillance threat** from security agencies. This frame also defines a clear cause of the problem, as it comprises of 43% of the reports about national security as a reason to neglect privacy and increase security. The solution goes through an open debate about the balance between security and privacy. This frame implies a clear evaluation, it considers politicians and legislators responsible for allowing monitoring to increase. The second cluster includes 32% of the analyzed cases. It is called **Technological development endangers privacy** and considers technology as the cause for privacy problems in 81% of the included cases. This frame defines two problems, caused by technological innovations and both are equally addressed in the cluster. The first one is a problem, connected to the technology itself (69% of the cases), the second concerns the complicated regulation of online privacy (again in 69% of the cases). The third frame encompasses 26% of the cases and is called **Better privacy legislation**. Almost all of the cases in this cluster include a solution toward improved regulation for privacy. A reason for this is the misuse of powers, however mostly by companies and by

governmental authorities. This suggest the high number of cases, which address data selling problems and consider reason for this to be the selling of personal information (mostly implied by companies and not by governmental officials).

The first frame, identified in the coverage of Guardian, is used in 53% of the articles discussing national security (Figure 15). The second cluster, which considers technology as a reason for privacy intrusions, applies to 63% of the reports, which problematize technological innovations. The last cluster defines topics about profiling and data selling (60%) and privacy protection measures (80%). It seems that this last frame is directed to discussion about solutions for privacy problems, triggered by the massive aggregation of personal data by marketing companies.

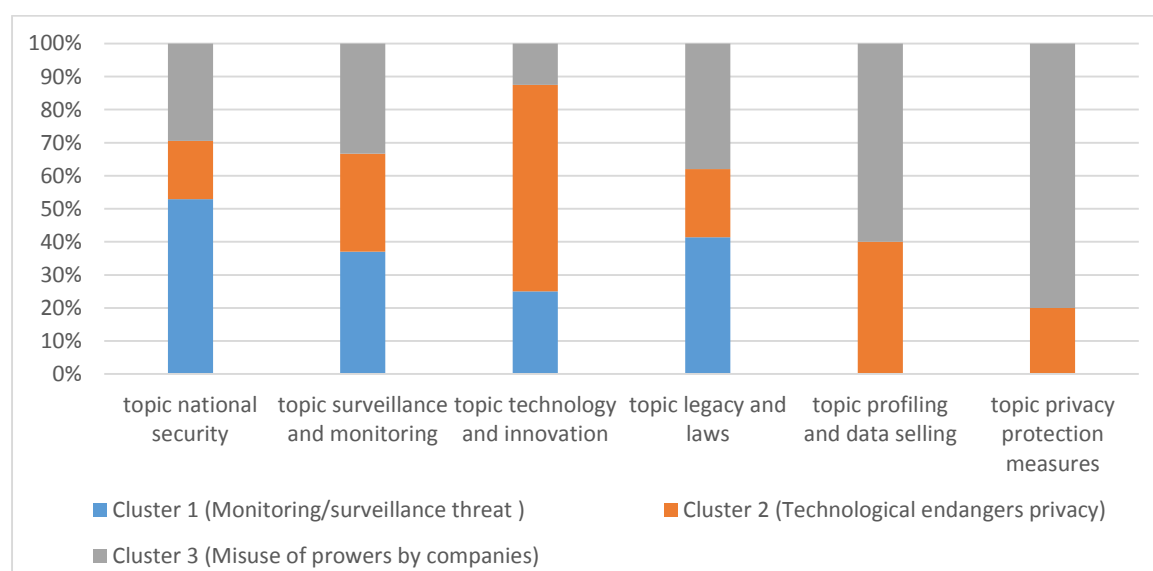


Figure 15. The Guardian: Distribution of topics according to the frames for 2012.

Figure 16 shows that 46% of the legal experts (AF:11 N=24) suggest that the solution for privacy problems and privacy protection lies in the improvement of current regulations. Further 65% of all journalists (AF:11 N=17) also promote this solution. 80% of the transnational institutions are concerned about the monitoring/surveillance threat from security agencies. British (AF:7 N=10) and American politicians (AF:6 N=8) also shape this frame as they appear to be major driver of the invasive gathering of data for security purposes. The last frame, which relates to the technological innovations is presented by 57% of the Internet user (AF:4 N=7) and 63% of the Internet giants (AF:10 N=16). This

relationship appear throughout all of the newspapers and appears to define privacy debate in 2012.

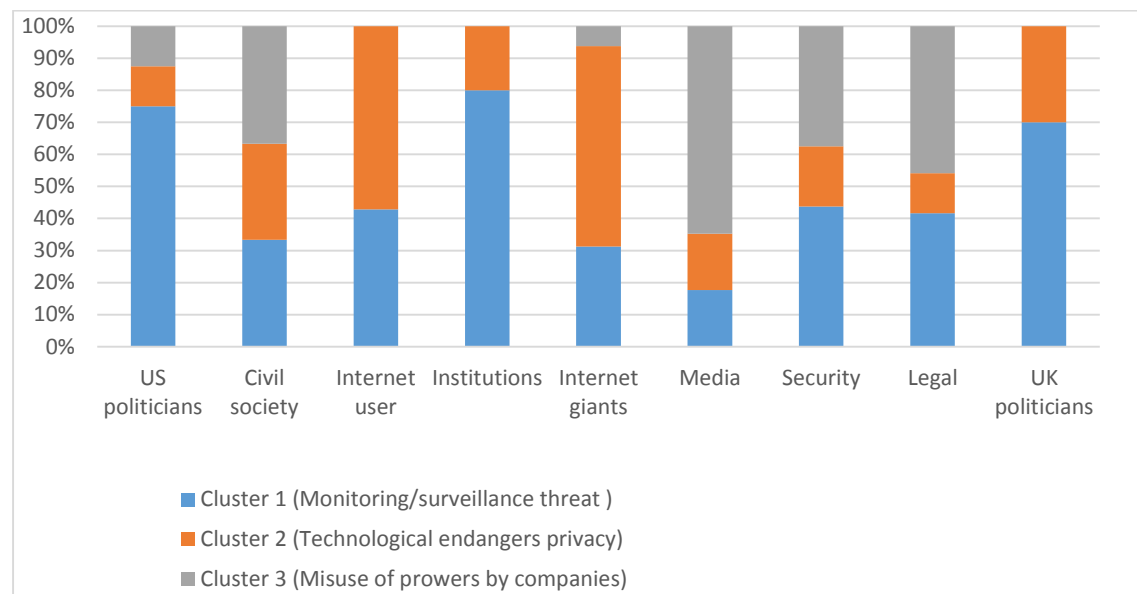


Figure 16. The Guardian: distribution of actors in the clusters for 2012.

Summary privacy discourse 2012

The privacy discourse provided by six newspaper in three western democratic countries in 2012 was dominated by three mayor frames. The first one is **National security-Frame**, promoted by Daily Telegraph, Washington Post and Die Sueddeutsche Zeitung. The second frame, which structures the discussions about privacy is **Technological development endangers privacy**. In the Technological development-Frame there were two conflicting interests. On the one side Internet users want to do business without any fear to be watched by unauthorized third parties. On the others side a big part of the difficulty with privacy on the Internet is the problematic situation with privacy policies of Internet giants like Fb and Google, which basically own a great amount of information about our private life. Finally the frame **(Cause) Surveillance friendly legislation**, was promoted by WP, SZ and Daily Telegraph, featuring discussions about whether mass-surveillance contributes much to our safety and if it is worth the disbursal of our privacy. These frames are in line with Holmlund (2014) results from the analysis of privacy discourse in 2012-2013. Comparing the frames of UK and American newspapers there is a clear tendency for more conservative newspapers to apply the same framing. Telegraph and Washington Post have not only the same frames but also equal distribution of the

frames in the articles of the newspapers. NYT and Guardian also mostly apply similar frames with exception of the National security-Frame, which is not present in the reporting of the British newspaper. A clear outlier, considering framing in 2012, appears to be Die Welt. The two cluster, identified by the analysis are promoting two opposing views in the privacy debate. The first frame **Surveillance will improve safety** of the newspaper has much in common with the National Security frame, discovered in other newspapers, however it is much more concrete in its demand for more surveillance. Remarkably is also that among all of the newspapers only The Guardian defines the monitoring/surveillance threat from security agencies as problematical. Reason for this is the fact that privacy debate in 2012 was concentrated on legacy and solutions for online privacy so much that it neglected privacy threats resulting from security concerns.

Privacy discourse in 2013

Washington Post

This chapter investigates privacy discourse during 2013 and aims to identify the nodal points in the public debate. Further the paper will examine whether the debate is colored by the negative influence of political scandals and if it paints a more concrete image of surveillance than during the previous period. Important questions to be answered are which elements are placed in relation to each other through the frames and in what way do newspaper resemble one other in their reporting about privacy.

The cluster analysis of privacy coverage of Washington Post revealed a three cluster solution as the most appropriate for the coverage. The first frame is defined by a prevalence of articles, which define **monitoring/surveillance threat** as a problem. It is the most important frame for the newspaper as it includes 44% of all cases. This cluster consists of an evaluation that blames politicians and legislators for allowing surveillance to increase in 50% of the cases. Close connected to this is the fact that articles define surveillance friendly legislation as the reason for the surveillance practices. The second is similar to the one used in the debate in 2012. It considers **technological development as threat for privacy** in all of the cases included in the cluster. Like in 2012, this frame includes the smallest amount of articles and has a minor influence on the debate as compared to 2014. The third identified frame is almost as significant as the first one,

because it consists of 40% of the analyzed articles. It is centered around the fate of the **whistleblower** and is provoked by Edward Snowden's revelations and his difficulties to find an asylum, because he is persuaded by the US government for breaking the law. The cause Agencies invasive gathering of data, found in 80% of the cases refines the frame. The fact that the moral evaluation *Snowden's disclosures damage US international relations* is found in more than a half of the included articles is in line with the message of the frame.

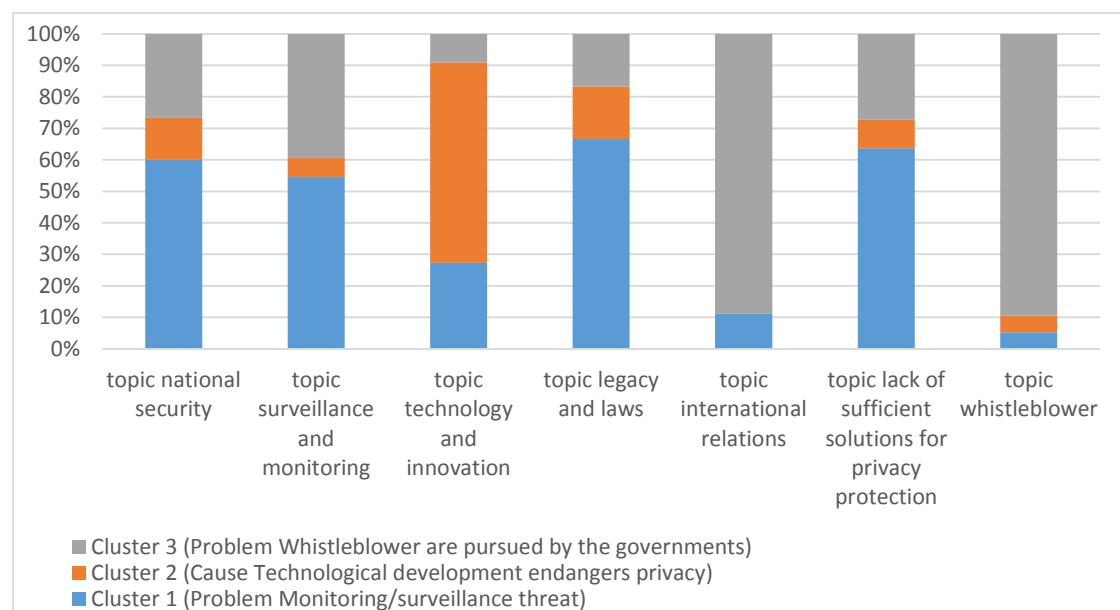


Figure 17. Washington Post: Distribution of topics according to the frames for 2013.

Fig. 17 shows that most of the topics about national security (60%) and surveillance (55%) were framed using the first identified cluster, **Monitoring/surveillance threat**. The results confirm the close relation between national security and surveillance actions. 64% of the articles, discussing the insufficient privacy legislation and 67% of those covering legacy and laws use the frame **Monitoring/surveillance threat**. This is due to NSA scandal, which triggered a debate about the regulation of secret agencies by the law and about the insufficient legal basis to protect citizens' personal life against invasion by intelligence agencies. Like in 2012, the frame **Technology endangers privacy** includes most of the articles, which reported about innovation (64% of the cases). The last cluster, which addresses whistleblower problems with the government, framed almost 90% of the articles, discussing whistleblower. When reporting about Snowden, the newspaper was mostly concerned with the problems he had with the American government. 88% from

the articles, discussing international matters were also shaped by the Whistleblower-frame. This fact strongly relates with the results from the cluster analysis, which showed that the evaluation *Snowden's disclosures damaged US international relations* was overrepresented in the frame.

The distribution of the actors according to the cluster solution confirms the results so far (Fig.18). The first cluster contains mostly NSA actors (60%, AF:12 N=20), as well as legal experts and security forces (75%, AF:6 N=8) and thus it defines the people incorporated in the problem with growing surveillance mechanisms. The presence of legal experts points to the connection between NSA and the FISA court. The frame, which refers to whistleblowing, includes 65% of the whistleblower (AF:17 N=26), mentioned in the articles of WP. However, because of its orientation towards international relations, the frame also includes all of the Russian governmental authorities (N=11) and 89% of the foreign authorities (AF:8 N=9). This refers to the intense discussions between US politicians and other countries about the fate of the NSA contractor. The frame connected to technological development includes 100% of the actors Internet giants (N=7).

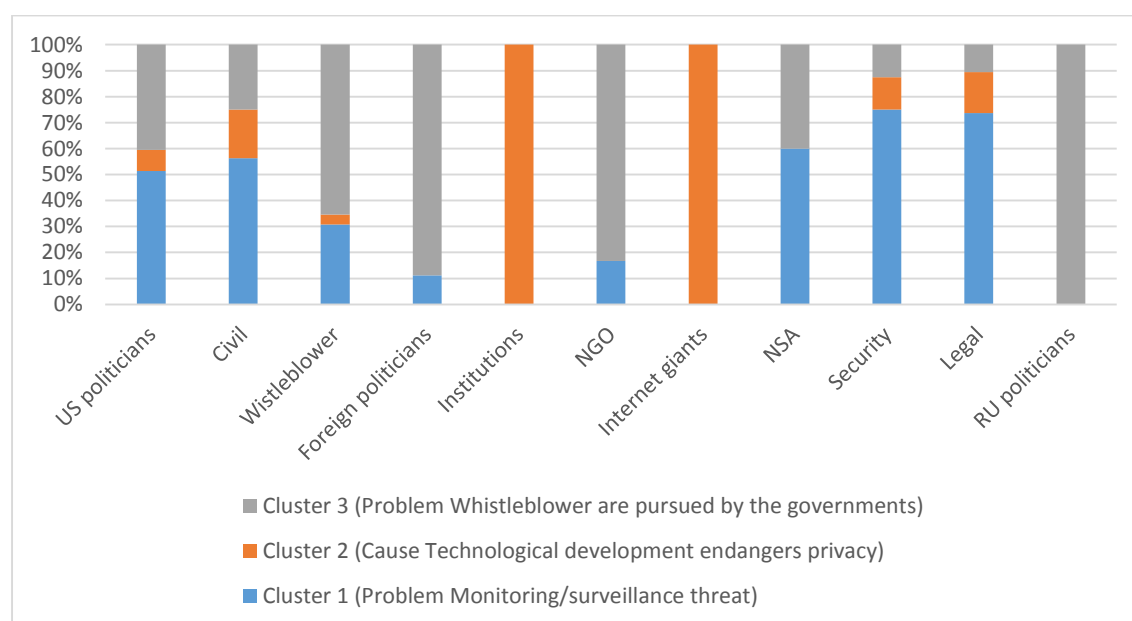


Figure 18. Washington Post: distribution of actors according to the frames for 2013.

New York Times

For NYT the hierarchical cluster analysis revealed a three cluster solution. The first frame consists of 44% of the cases analyzed for 2013. It contains 82% of the articles, which deal

with the surveillance friendly legislation as a cause for privacy problems. Therefore it is called **Surveillance friendly legislation**. The problem connected to this is considered to be the monitoring threat from security agencies in 77% of the cases. The second frame is called **Monitoring/surveillance threat due to technological innovations** and contains 34% of the articles. It includes cause technological development and the problem of increasing surveillance. Actually these two frame elements give two interpretations of growing surveillance. The first one states that surveillance is due to surveillance friendly legislation, whereas the second one considers technological development to be the reason. The third cluster addresses **problems, facing whistleblowers** and contains 22% of all cases. All of the articles included in this frame report about whistleblowers as being persuaded by governments and point out that agencies invasive gathering of data is the reason for whistleblowing. Close connected to these results are the two evaluations, addressed by 82% of the cases included in the cluster. The frame consists of critique about the US government for using coercive means to force countries (including the EU) to comply with their measures and at the same time points out the damage on the US international relations done by Snowden's disclosures.

Looking at the distribution of the topics across the three clusters, it appears that most of the articles were framed, using the first cluster (Fig.19). In particular articles discussing legacy (93%) as well as privacy protection measures (75%) and national security (73%), were framed by **Surveillance friendly legislation**. Additionally half of the articles, discussing the lack of sufficient solutions were also framed, using this pattern. Privacy protection solutions were discussed in connection to surveillance friendly regulations, promoted by legal experts. The second frame appears to replicate the one used in 2012. There is a strong tendency in the articles, discussing technology and innovation to be framed by technology as a cause for the growing monitoring. The other half of the reports, which were critical of the insufficient privacy regulations are also included in this frame. The last frame, which was dedicated to whistleblower, is used by 64% of the articles, reporting about international relations and in 55%, which cover whistleblowing in one way or another. Remarkable is the strong association of this frame with international relations.

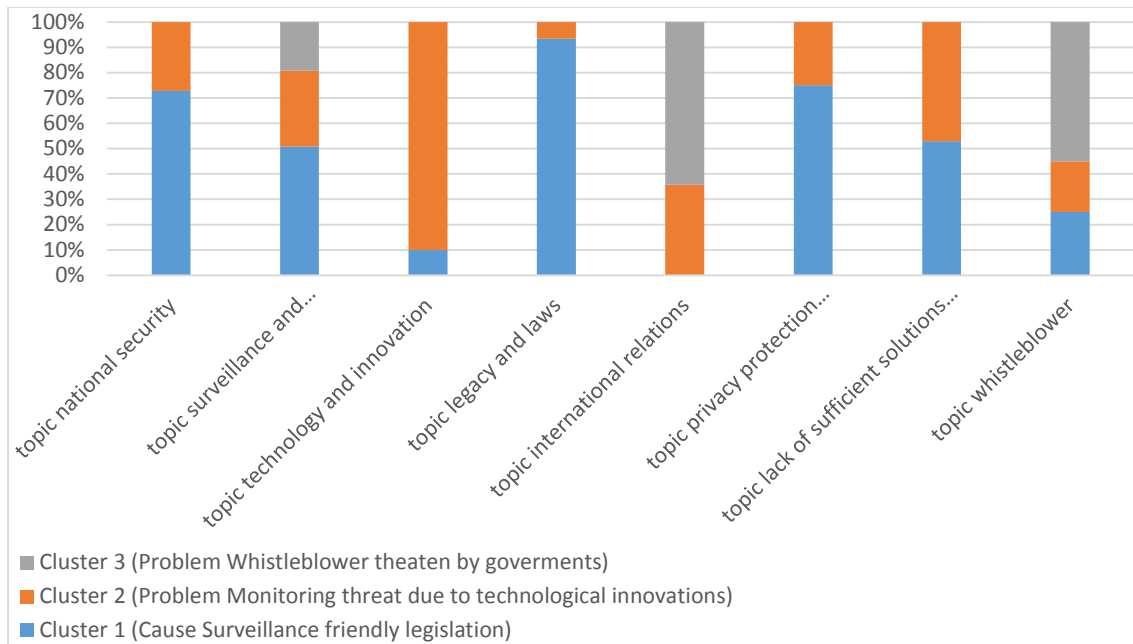


Figure 19. New York Times: Distribution of topics according to the clusters for 2013.

Considering the actors, included in the three frames the differences between the first and the second cluster become even more obvious (Fig.20). The frame **Surveillance friendly legislation** consists mainly of civil society (86% AF:6 N=7), legal experts (58% AF:7 N=12) and security forces (67% AF:4 N=6). The second frame **Monitoring threat due to technological innovations** includes mostly Internet giants (71% AF:5 N=7) and all of the Internet users, reminding us on the 2012 debate and the problematical satiation with technology. The third frame was promoted mainly by NGOs (63% AF:5 N=8) and foreign politicians (43% AF:6 N=14) which confirms that reports about international relations were often using this frame.

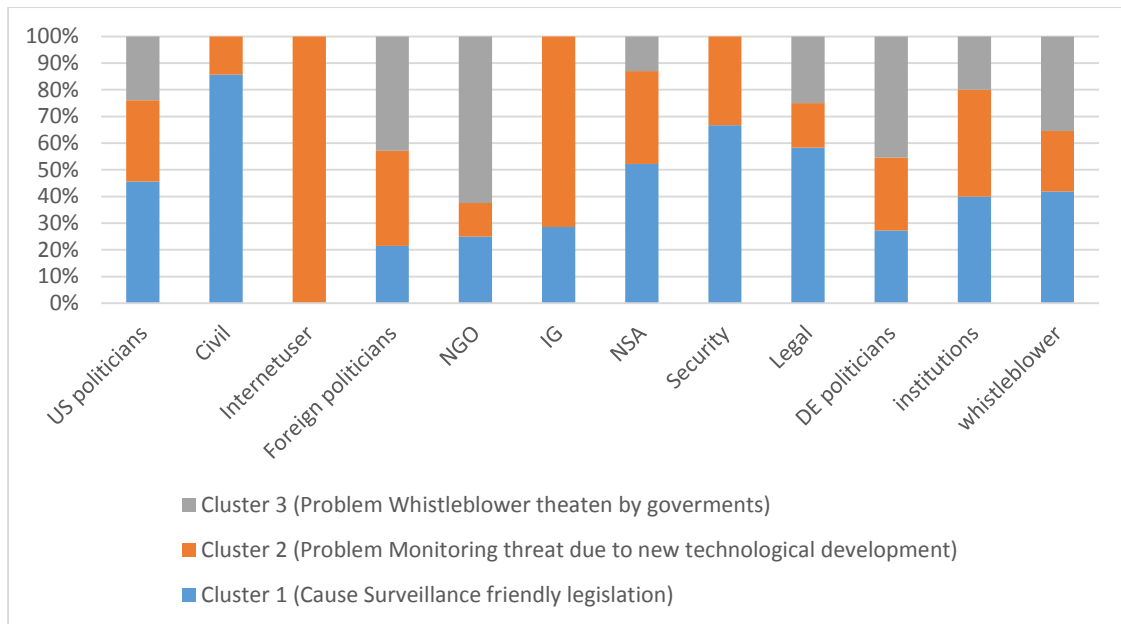


Figure 20. New York Times: distribution of actors in the clusters for 2013.

Sueddeutsche Zeitung

The solution for the newspaper consists of two opposing frames, which spilt the selected cases into equal pieces. The first frame is called **Monitoring is needed to ensure national security**. This cluster consists of 80% of the articles, which emphasize the monitoring/surveillance threat as problematical. However 68% of the articles point out that privacy has to be reduced in favor to fight criminal activity. Therefore this frame views monitoring as vital for the security of the citizens and the battle against terrorism. The second frame is slightly different than the first one. It is called **Invasive surveillance from intelligence agencies**. Again, the main problem appears to be surveillance, addressed by 96% of the articles. Nevertheless, there is a second problem, which appears to be the difficult situation with the relations between Germany and US, identified in 60% of the cases. The solution goes through an open debate between the leaders of the two countries and not through an increasing surveillance like in the first cluster.

Most of the articles, when reporting about national security matters (64% of the articles) and technology (75% of the articles) used the first frame to do this (Fig.21). This is due to the fact that German governmental authorities used the NSA scandal as a reason for strengthening their own intelligence agency. Many of the articles discussed what has to be improved regarding technology and other resources in order to enable BND with the

measures to counteract the surveillance coming from NSA. In particular whistleblower topics (93%) and reports, criticizing the legislation (67%) were framed using the second cluster. This suggests that most of the reports about Edward Snowden had a more negative position towards the spying activities of the US government. Besides that 75% of the articles, discussing international relations also used the frame, which criticizes the NSA activities.

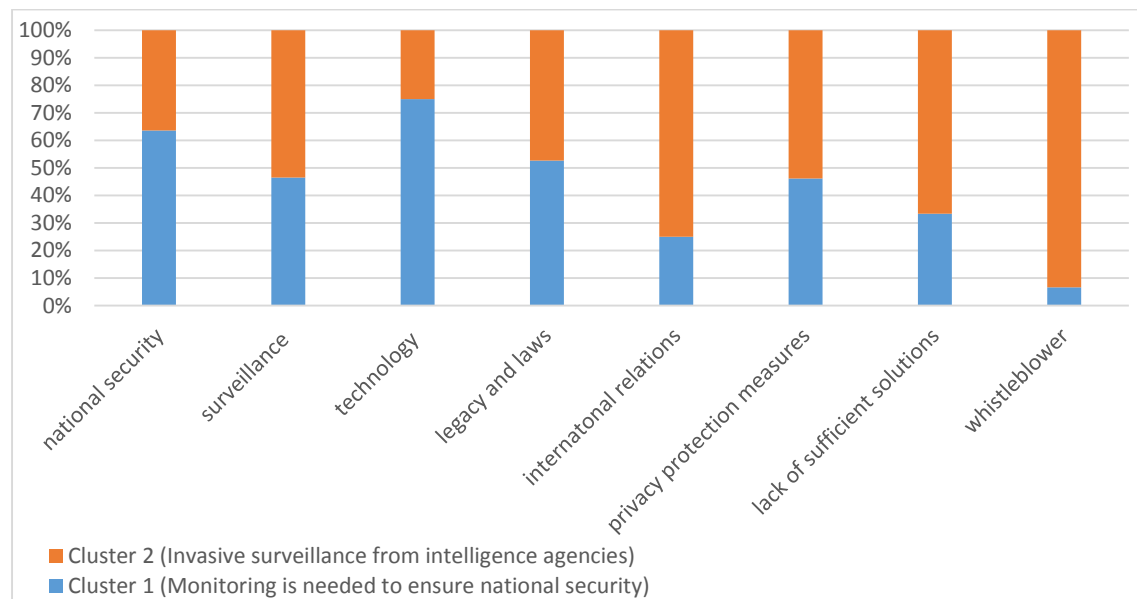


Figure 21. Sueddeutsche Zeitung. Distribution of topics according to the frames for 2013.

The distribution of the actors across the frames shows that 60% of the civil society (AF:12 N=20) was present in the first frame - **Monitoring is needed to ensure national security** (Fig.22). Furthermore security actors also define the structure of the frame (83% AF:5 N=6). This result is in line with the more positive nature of the frame towards security and surveillance. The second cluster is mostly defined by whistleblowers (72% AF:13 N=18) and the US politicians (77% AF:17 N=22) and is more connected to the political scandal.

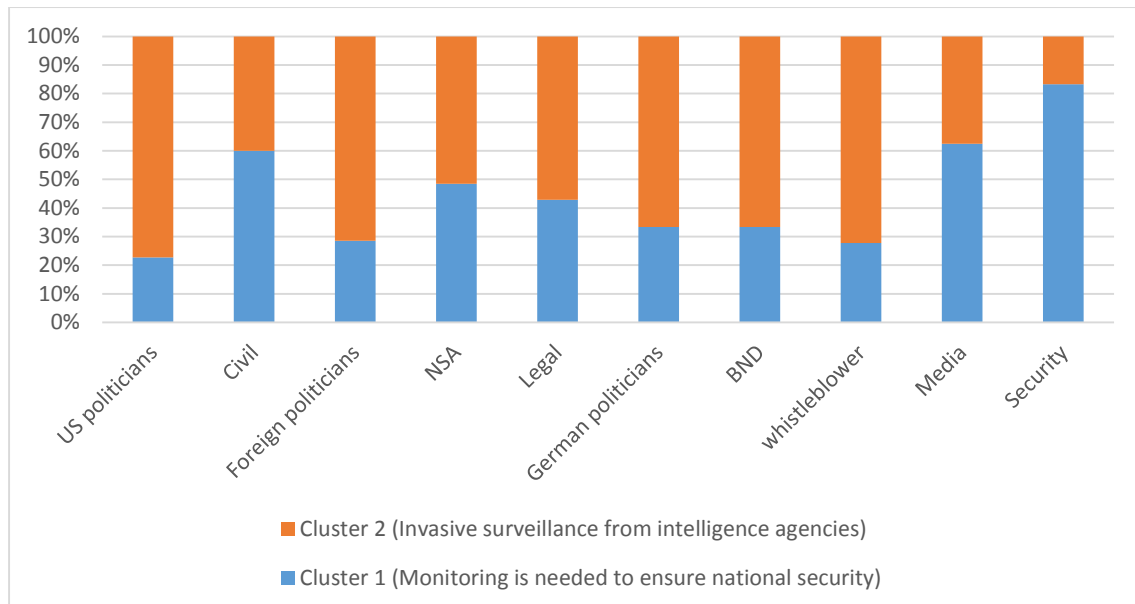


Figure 22. Sueddeutsche Zeitung: distribution of actors across the frames for 2013.

Die Welt

The coverage of the newspaper Die Welt is centered around two frames. The first cluster includes 60% of the analyzed articles and is called - **Monitoring from intelligence agencies**. It is focused on surveillance coming from security agencies and points out to the problem of powers misuse (in 77% of the included cases), which is especially relevant considering the NSA surveillance. There is a clear cause for privacy problems and it lies in agencies invasive gathering of data, addressed by 83% of the selected articles. 60% of the cases in this cluster suggest that a solution lies in the communication and the open debate about the balance between privacy and security. The second frame consists of 40% of the analyzed articles for 2013 and states that there is a huge problem with the regulation of privacy in an online context. The monitoring/surveillance threat and technological development are considered to be the major problem in this frame. Both are represented by 70% of the cases. The reason for these problems lies again in technology and innovations (80%), but here technology is not understood in terms of new ways of communication, but more as new advanced methods to monitor citizens.

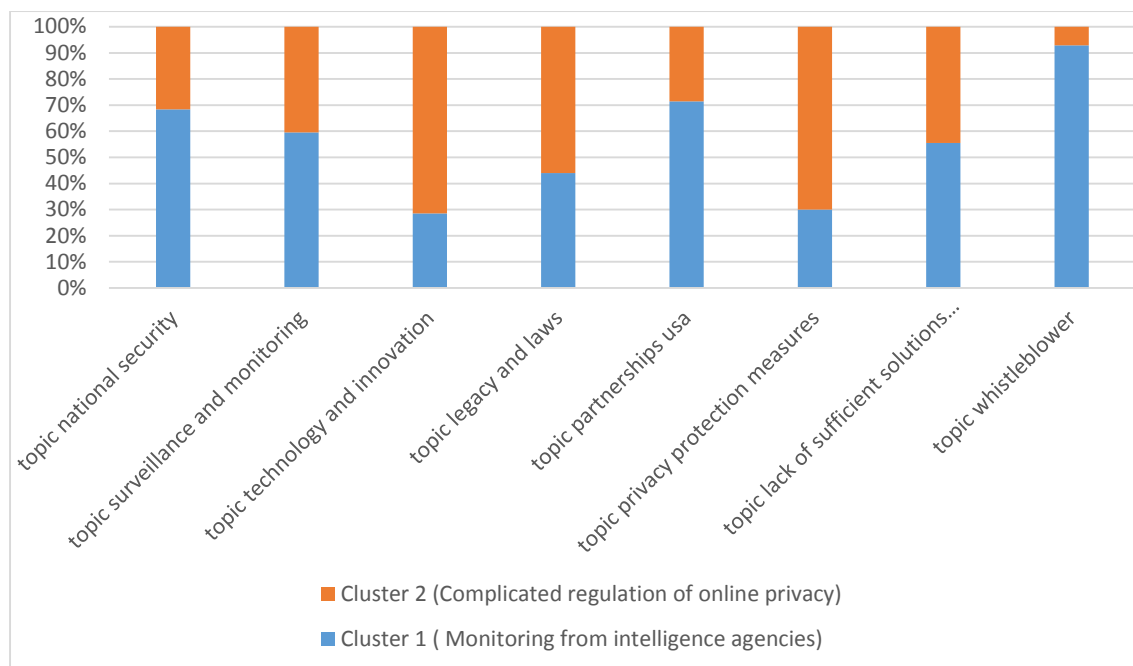


Figure 23. Die Welt: Distribution of topics according to the frames for 2013.

Figure 23 shows that the first frame is applied by 93% of the articles discussing whistleblowing, because the newspaper does not have a separated frame, which concentrates directly on the whistleblower. In sum, 68% of the articles discussing national security matters and 60%, which address surveillance and monitoring, use the frame **Monitoring from intelligence agencies** to do so. There is also a strong connection to international relations, as 71% of the articles, discussing it, were framed by the first cluster. The second cluster was primary present in articles, discussing technology or those suggesting privacy protection measures.

The first frame provides a variety of actors, whereas the second frame consists mostly of Internet user and Internet companies (Fig.24). The actors *international institutions* (N=11) and *civil society* (N=23) are almost equally present in both frames. The second frame, which deals with the monitoring/surveillance threat, includes 81% of the whistleblowers (AF:13 N=16) and 86% of the security forces (AF:6 N=7). Also three out of four NSA actors appear in this frame (AF:21 N=30). This cluster includes 100% of the Russian politicians (N=5) and 75% of the US actors (AF:15 N=20), which is closely connected to the high percentage of international relations topics, using this frame.

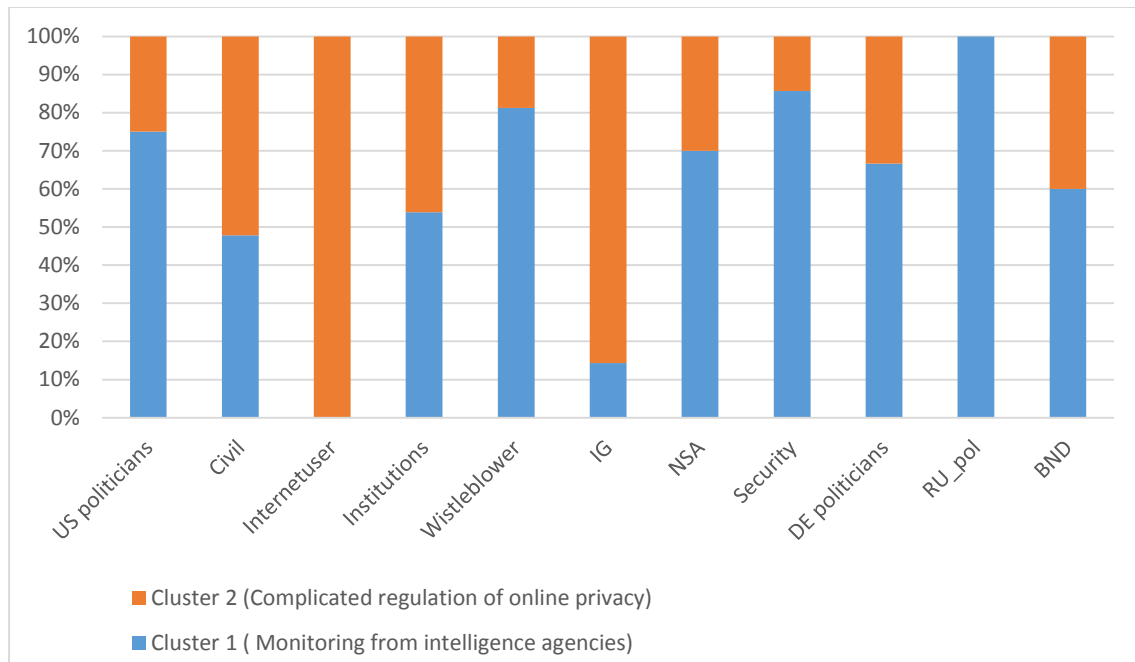


Figure 24. Die Welt: distribution of actors according to the frames for 2013.

The Daily Telegraph

The coverage of Daily Telegraph reveals three frames for 2013. The first cluster comprises 48% from all of the articles about privacy. In particular, 75% of the cases, included in the cluster consider data saving as the major problem for people's privacy. This is the reason, why the frame is named **Problem Data collection**. Further more than half of the cases suggest that privacy legislation has to be improved in order to fight massive data aggregation and profiling, used by marketing companies in order to maximize their profit. The second frame is called **Agencies invasive gathering of data**. It includes 15 from the analyzed 50 articles for the period. All of the included cases recognize the data collection by security agencies to be the cause of privacy problems. The major problem connected to this is surveillance threat (addressed by 80% of the articles). The frame includes also whistleblowing activities as causing problems to governments and companies because of the revelations about illegal activities taking place. Especially interesting is the last frame of the newspaper. It states that **Surveillance will improve safety** and suggests that more monitoring is still needed to counteract terrorism. The cluster includes also a clear evaluation of the events, which again goes in line with the suggested solution. 82% of the articles discuss surveillance as the only way to keep citizens safe.

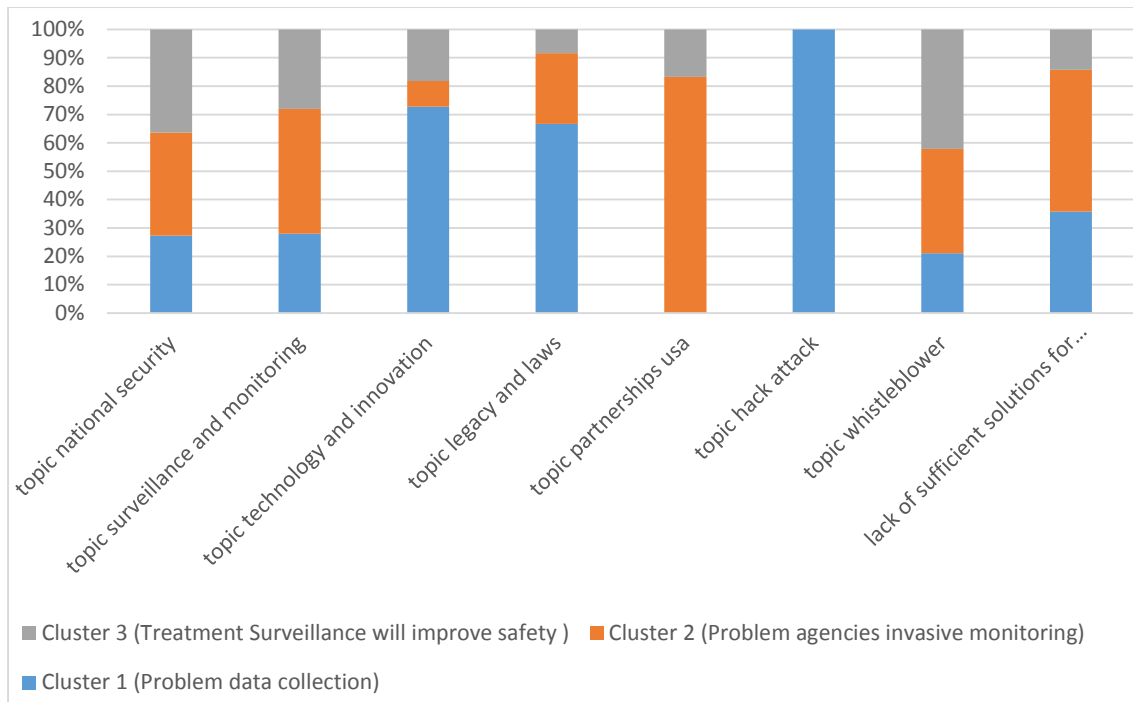


Figure 25. Daily Telegraph: Distribution of topics according to the frames for 2013.

To explore the structure of the extracted frames, one has to consider the distribution of topics in the identified frames (Figure 25). The first cluster framed all of the articles, discussing hacker attacks and indicates that the problem with data collection is induced by Internet users and hackers. This confirms also the high percentage of articles, which cover technological development and use this frame to do so. The second frame **Agencies invasive gathering of data** characterizes 44% of the coverage about surveillance and monitoring. This is due to the NSA scandal, which gave the public someone to blame for the increasing loss of privacy in their daily life. An evidence for the strong connection between the surveillance scandal and international political relations provide the high number of articles (83%) about international relations, framed by the second cluster- **Agencies invasive gathering of data**. Interestingly, national security topics are split between the second and the third identified frames. The cluster **Surveillance will improve safety** was used by the rest 36% of the national security reporting. Surprising is though the high percentage of articles reporting about whistleblowing, included in this frame (42%). Reason for this is probably the fact that the newspaper has a more negative position towards the whistleblower - Snowden. It discusses the NSA contractor, emphasizing the great damage, he has done for the US international relations and supports government's position in the scandal. These findings are confirmed also by looking at the distribution of actors in the frames.



Figure 26. The Daily Telegraph: distribution of actors in the clusters for 2013.

The first frame **Problem data saving** is defined by all of the Internet corporations actors and security forces (Fig.26). Data aggregation actions could be linked to Internet giants. Civil society is more or less a victim in the frame. 76% of the civil society actors (AF:13 N=17) promoted the frame about data saving problems. Further it is supported by more than a half of the included legal experts (AF:4 N=7) and the UK political actors (AF:13 N=23). The results confirm the assumption of a tension between personal privacy and recent technological developments. This conflict builds the foundation for legislative changes and legal development. The second frame is promoted by 60% of the NSA actors (AF:3 N=5) and 78% of the German politicians (AF:7 N=9). Both results are connected to the distribution of topics in the extracted frames. As the frame is used in many of the articles, discussing international relations, it is not surprising that German actors shape the structure of the frame. Exactly the German-US relations were challenged by the NSA revelations. This is why, the relations are a major topic in the coverage of all newspapers. The high numbers of NSA actors confirms the results and defines the structure of the frame. The last cluster **Surveillance will improve safety** is promoted mainly by the US (AF:10 N=21) and Russian politicians (AF:8 N=15). The US political actors use the frame as an excuse for the indiscriminant surveillance activities taking place. Russian politicians are discussed regarding their decision to provide a temporary asylum for the NSA contractor Snowden.

The Guardian

The hierarchal cluster analysis reveals two frames, used by The Guardian in its coverage of privacy issues in 2013. The first frame is called **Whistleblower threaten by the US government** and includes 56% of the cases for 2013. Almost half of the articles, included in this cluster consider problems connected to whistleblower and whistleblowing activities to determine the privacy discourse. This is due to the fact that the newspaper first published the revelations of the NSA contractor and has a personal link to the story. A second problem, addressed by this frame, is referring to the misuse of powers by the government, which implies a hidden critique to the UK and the US political officials. The newspaper considers in 35% of the cases that an appropriate solution for these problems lies in the improvement of privacy laws and regulations in order to avoid future privacy intrusions. The second frame encompass 44% of the analyzed articles for 2013. Because 95% of the included cases view the increasing surveillance as a major problem for citizens' privacy rights, the frame is called – **Monitoring threat from security agencies**. Further 91% of the cases in this cluster considered power misuse and agencies data gathering as key factors in the privacy debate. While the first frame is focused on Edward Snowden and his revelations about the NSA and GCHQ surveillance techniques, the second frame is much more concentrated on the surveillance threat in general. The second cluster blames politicians and legislators for the increasing espionage and monitoring activities in 64% of the cases and considers communication and an open debate to be the solution for the problem.

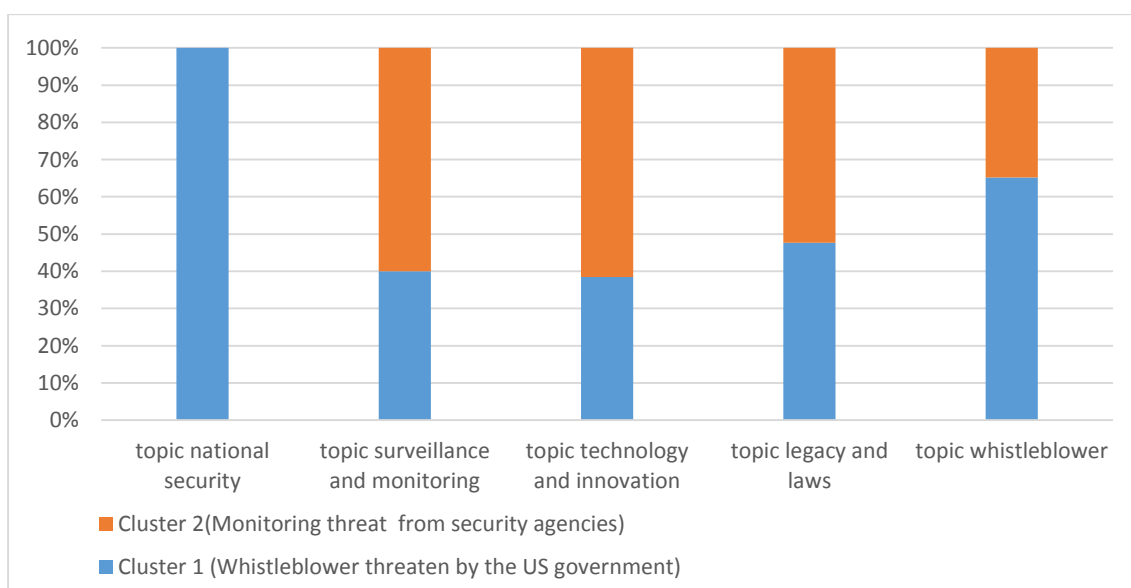


Figure 27. *The Guardian*: Distribution of topics according to the frames for 2013.

Looking at the distribution of topics (Fig.27), it seems that all of the national security topics were framed using **Whistleblower threaten by the US government** frame. This indicates that articles mostly discussed national security in relation to the whistleblower. However, it is not possible to prove if Snowden's revelations were discussed as a threat to the US national security or if the newspaper provided discussions about whether national security has to be more important than privacy. Around 60% of the reports about surveillance and technology were framed using the second cluster – **Monitoring threat from security agencies**. Besides that also 52% of all reports about legacy and laws were using this frame. The results confirm the assumption about a strong critique towards the US government for misusing its power to catch the whistleblower and towards the increasing surveillance in general.

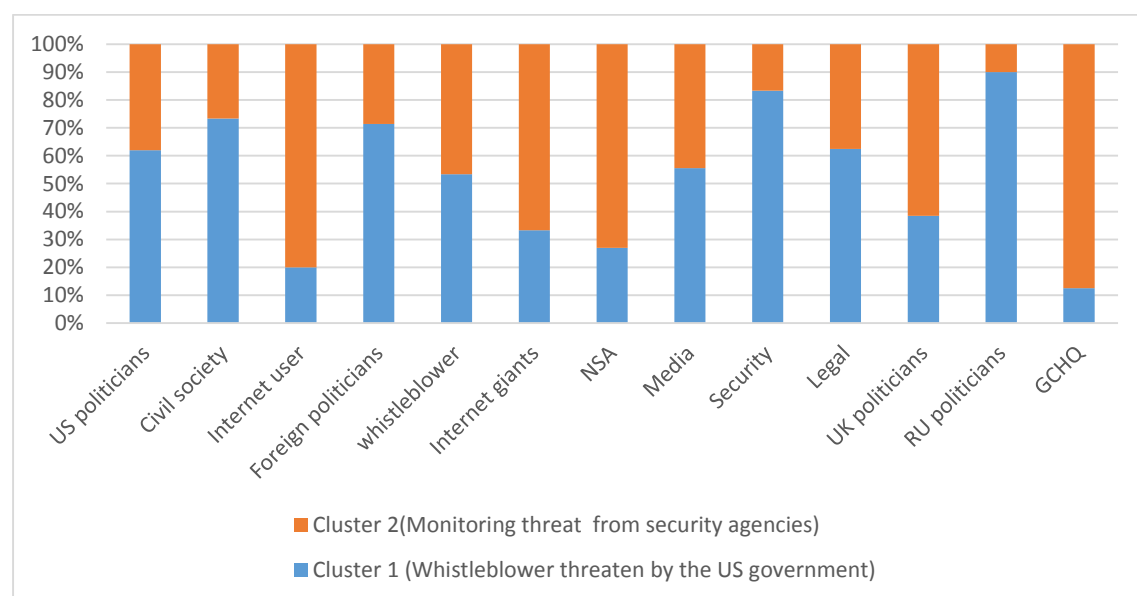


Figure 28. The Guardian: distribution of actors according to the frames for 2013.

The distribution of actors in the frames presented by Figure 28 reveals that all of the foreign political actors are concentrated in the first frame. The high percentage of Russian actors (AF:9 N=10) in the first frame relates to Snowden's problematical asylum situation and the difficulties regarding the international relations between the US and Russia. In comparison to this, the second frame includes most of the UK political actors (62% AF:8 N=13), as well as Internet giants (67%, AF:4 N=6) and Internet users (80% AF:4 N=5). It could be assumed that using this frame, the newspaper paid attention to domestic privacy problems, which are shaped by the relation between Internet giants and users.

Summary privacy discourse 2013

Compared to 2012, privacy discussions in 2013 are much more consistent regarding the message they want to bring to the public. In all of the analyzed newspapers, there is a frame about the monitoring threat. Whereas all of the UK and German newspapers have built their monitoring frame naming the concrete source of the surveillance threat – NSA, the US newspapers choose not to mention the agency or to blame the technology for the loss of privacy. Sueddeutsche Zeitung and Daily Telegraph provide a uniform discourse about privacy topics in 2013. They both have frames that are mutually exclusive. On the one hand, they criticize the unnecessary and indiscriminant surveillance, but on the other they use a frame that includes an excuse for the growing espionage e.g. “surveillance will improve safety”. In contrast to 2012, where technology was the dominant frame, in 2013 technological development is not addressed by all of the newspapers. The more conservative newspapers - Telegraph, Washington Post and Die Welt discuss technology as a cause of privacy problems. Further three out of six newspapers were strongly influenced by the Snowden revelations and the scandal formed around NSA, the US government and the former NSA contractor. These newspapers were Guardian, Washington Post and NYT. They all used the frame “whistleblower threaten by the government” in their privacy discussions for 2013. This is due to the fact that Guardian was the first newspaper, which made contact to Snowden and published its controversial leaks. Washington Post was also approached by Snowden, but the newspaper started to report on the issue later than The Guardian did. Although NYT was not involved so much in the scandal, it as the leading newspaper in the US, always provided latest news on the computer analyst, who gave the Guardian top-secret NSA documents. The Guardian was highly critical of surveillance in its discussions. The newspaper applied only two frames, both of which were questioning the US government’s actions and the NSA massive surveillance. In sum the debate, provided by all newspapers is much more concrete, focused on surveillance as a formulated threat and whistleblower’s problem with US government.

Privacy discourse in 2014

Washington Post

The Washington Post privacy discourse in 2014 was dominated by three frames. The first frame includes 54% of the analyzed articles and is called **Cause National security**. It states that privacy has to be reduced in order to fight criminal activity. In 30% of the included cases this cluster considers national security as problematical. It suggests in one out of three articles that surveillance is the way to counteract terrorism and combined with technology can keep us safe from criminals. The second frame is focused on **Problem Data saving**, which is according to 98% of the articles almost always caused by the complicated regulation of online privacy. Technological innovations and the insufficient state of privacy legislation also contribute to the problematical situation with data saving from companies or individuals in 86% of the cases. This is the smallest cluster from all, identified in the newspaper and includes only 14% of the reports for 2013. The last cluster is called **Problem surveillance threat**, because 100% of the cases name the increasing monitoring as a major problem for citizens' privacy rights. This frame detects many causes for the problem. Among the most important are agencies invasive gathering of data and surveillance friendly legislation (mentioned in 44% of the cases) as well as national security, reported by half of the articles. This cluster includes 32% of the coverage for 2014.

The first cluster framed 83% of the articles, discussing national security and 60% of the reports about technological innovations (Fig.29). These results assume a link between technology and surveillance as a solution for security purposes. This is consistent with the interpretations of the frame. It includes 33% of the articles, addressing technology as vital for security. The rest 40% of the topics about technological innovations were framed more negatively using the second cluster - **Problem data saving**. This frames was also used in one out of three reports about privacy protection measures. The last cluster was almost equally applied by articles discussing surveillance (62%) and those addressing laws and legal trials (67%). This is due to the intensive debate in US about the reconfiguration of the regulations for the NSA data acquisitions. This frame was also used in the reporting about international relations, a tendency, which continues since the NSA revelations in 2013.

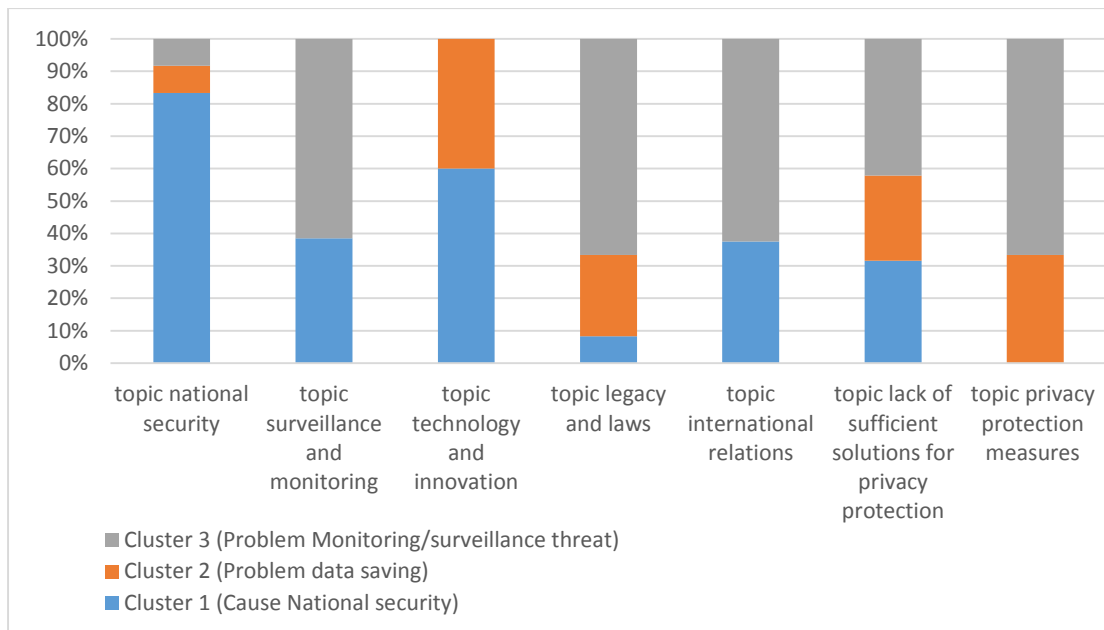


Figure 29. Washington Post: Distribution of topics according to the frames for 2014.

Fig.30 shows that the US politicians were evenly distributed across the first and third clusters, with the third frame having 6% more US political actors (AF:13 N=27) than the first one (AF:11 N=27). Further the first frame included all of the actors *foreign politicians* (N=5) and 67% of the security forces (AF:8 N=12), which is closely linked to the fact that this frame was mostly concerned about national security problems. As the third frame included most of the articles reporting about international relations, so it is almost natural that it is promoted by 100% of the German governmental authorities (N=5). Because of its strong connection to surveillance topics, this frame consists of all of the whistleblower actors (N=1) and 93% of the NSA actors (AF:14 N=15).

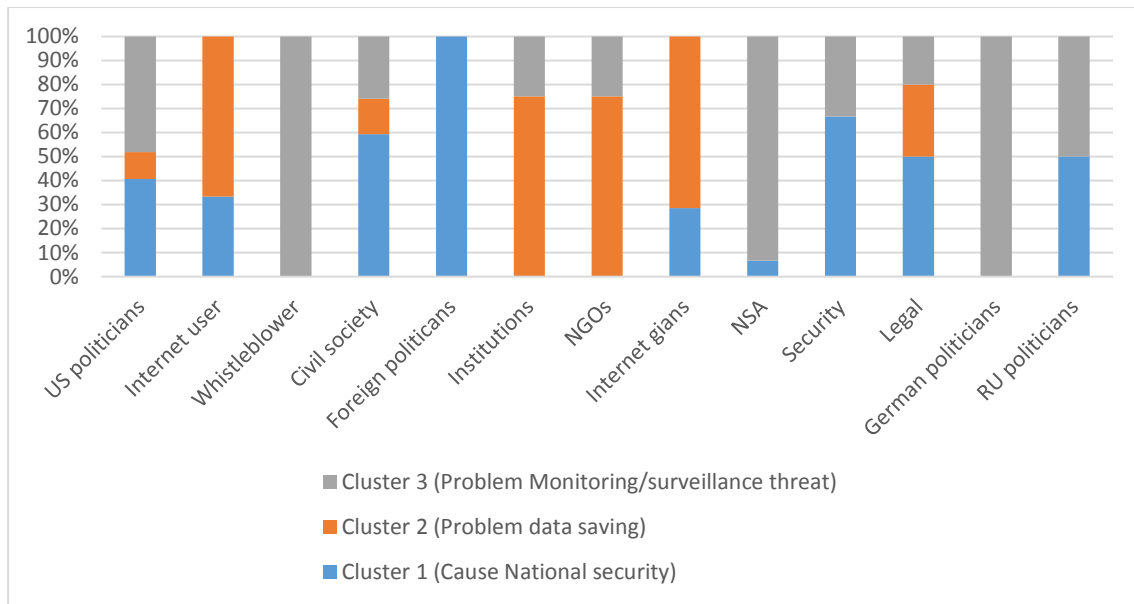


Figure 30. Washington Post: distribution of actors in the clusters for 2014.

New York Times

The cluster analysis for 2014 revealed a three cluster solution for New York Times. The first frame consisted of 42% of the selected articles for 2014. It is called **Problem Misuse of powers** as it included 61% of the cases which point out that governments' and agencies' abuse of power is a major problem for privacy in 2014. The second problem addressed by 57% of the cases is the increasing surveillance. These problems were triggered by agencies invasive gathering of data (39%) and the insufficient regulations regarding privacy (35%). The second cluster included 24% of NYT articles for 2014. It is mostly concerned with the implications technology has on privacy (in 92% of the cases) and is called therefore **Technological development complicates privacy regulation**. Further 83% of the articles mentioned complicated regulation of privacy online as a problem, created by technological innovations and new means of communication. The third frame is named **National security** and discusses this problem in 93% of the included cases. This frame further views surveillance as a possible solution to the problem and the only measure to prevent terror attacks in 87% of the included articles. This cluster encompasses 34% of the NYT coverage for 2014.

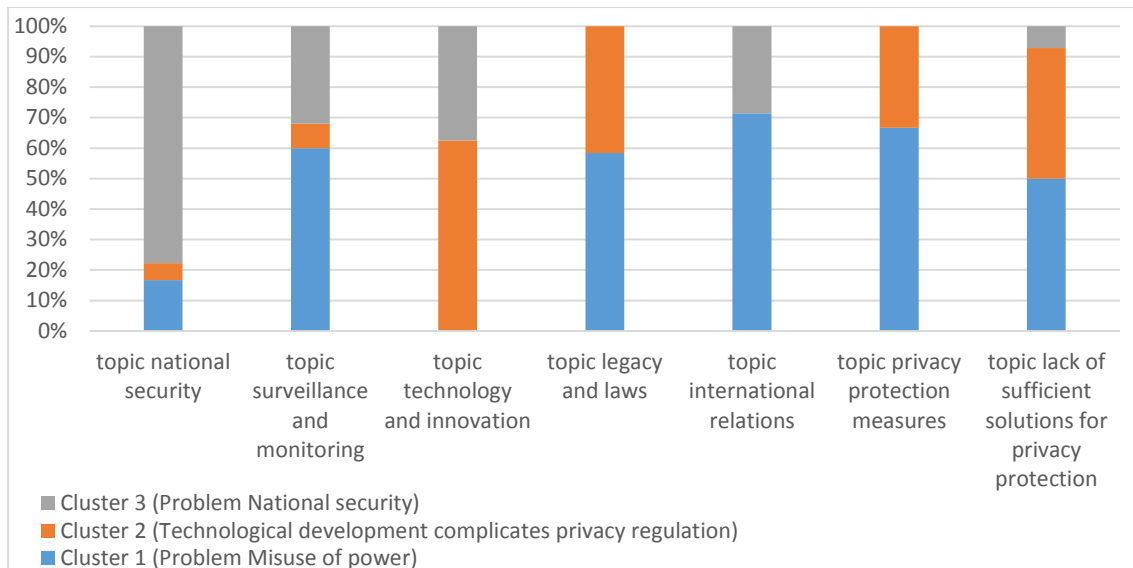


Figure 31. New York Times: Distribution of topics according to the frames for 2014.

The first frame is used by 60% of the articles addressing surveillance and monitoring issues and 67% of the reports about privacy protection measures (Fig.31). This frame is very similar to the one discovered in 2013 debate. This is confirmed also by the 71% of the articles about international relations, which apply this frame. The second cluster, which is focused on technology as a creator of privacy problems frames 63% of the topics about technology and innovation. 43% of the reports, discussing the insufficient regulations of privacy, reinforce the idea of technology as a danger for privacy. The last frame, which defends the inevitable role of monitoring in the battle against terrorism, includes 78% of the articles covering national security.

The first cluster was promoted by 85% of the NSA actors (AF:11 N=13) and all of the whistleblower (Fig.32). The frame further includes 54% of the US political actors (AF:13 N=24). Thus it could be assumed this is a reframe of the events in 2013. The second frame includes all of the Internet giants and 88% of the Internet users (AF:7 N=8), thus building the same structure as technology frame in 2012. The presence of legal experts (AF:4 N=9) suggests that the frame discusses legal consequences from the debate between users and producers of technology innovations. The last cluster is shaped by a strong presence of foreign politicians (64% AF:7 N=11) and security forces (50% AF:8 N=16), who reinvigorate the positive role of surveillance for national safety.

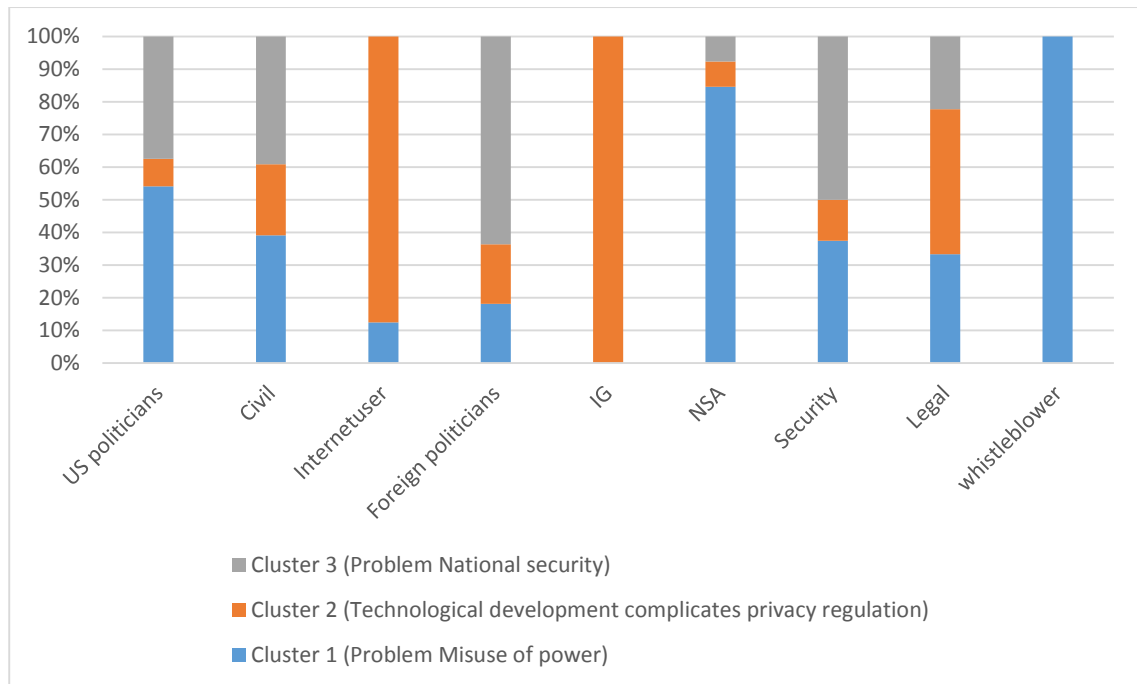


Figure 32. New York Times: distribution of actors in the clusters for 2014.

Sueddeutsche Zeitung

The cluster analysis for 2014 reveals a two cluster solution for the privacy coverage of SZ. The first cluster is more important for the newspaper as it includes 64% of its articles for 2014. This frame is called **Problem National Security** and contains 53% of the cases, discussing security as problematical. The second cluster comprises the rest 18 articles. It is named **Problem Monitoring threat**, because all of the included cases addressed the increasing surveillance as a danger for privacy. The first frame suggests two possible solutions. The first one is connected to technology as important to prevent terrorist attacks (mentioned by 34% of the cases). The second one goes through more surveillance (25%), as inevitable for national security. The second frame views NSA system as a massive and invasive surveillance machine in 64% of the cases and blames agencies invasive gathering of data for the identified privacy problems in 83% of the cases.

Figure 33 shows the distribution of topics across the two clusters. It reveals a tendency for the first frame to be used in reporting about technology (59%) and national security (76%). This result is in line with the assumption for a link between technology and surveillance as positive for the society's safety. The second cluster, however, frames most of the topics about surveillance (75%) and the lack of solutions for privacy protection

(88%). Further 80% of the reports about whistleblower were also framed using this second cluster.

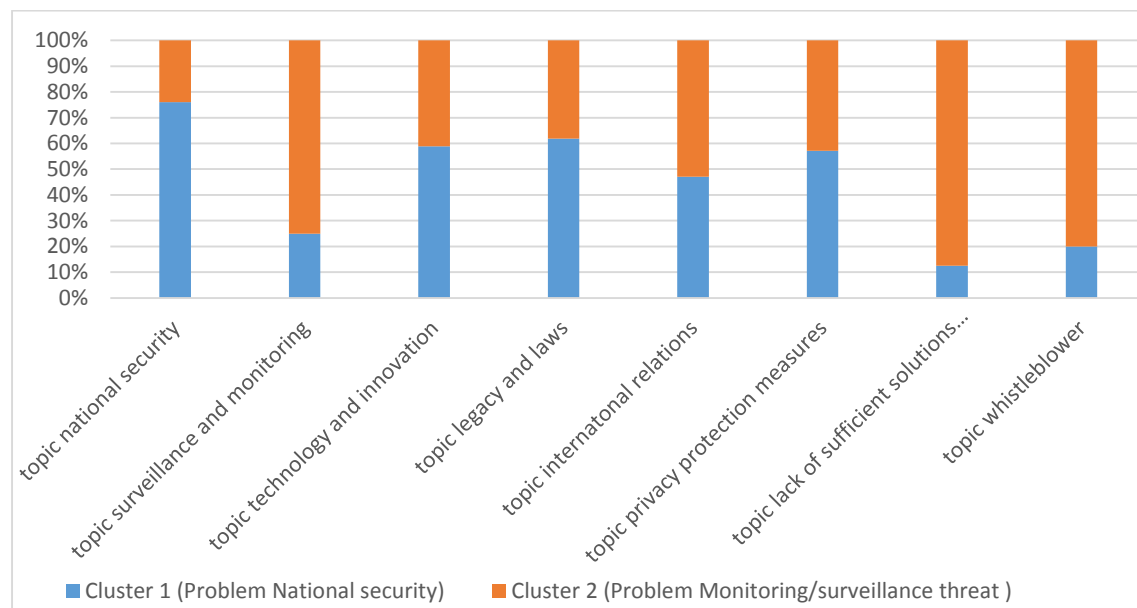


Figure 33. Sueddeutsche Zeitung: Distribution of topics according to the frames for 2014.

The distribution of actors again suggests that the national security threat is connected to foreign politicians, probably to international relations too (Fig.34). This is confirmed by the fact that all of the security forces and foreign politicians are part of the first frame. The second cluster, which criticized surveillance techniques, is constituted by 83% of the NSA actors (AF:15 N=18) and 86% of the whistleblower actors (AF:6 N=7). It reflects again the conflict between these two parties in 2013. Further most of the German politicians (64% AF:9 N=14) and US politicians (63% AF:10 N=16) are also present in this frame. This confirms that the conflict is mainly on a political level.

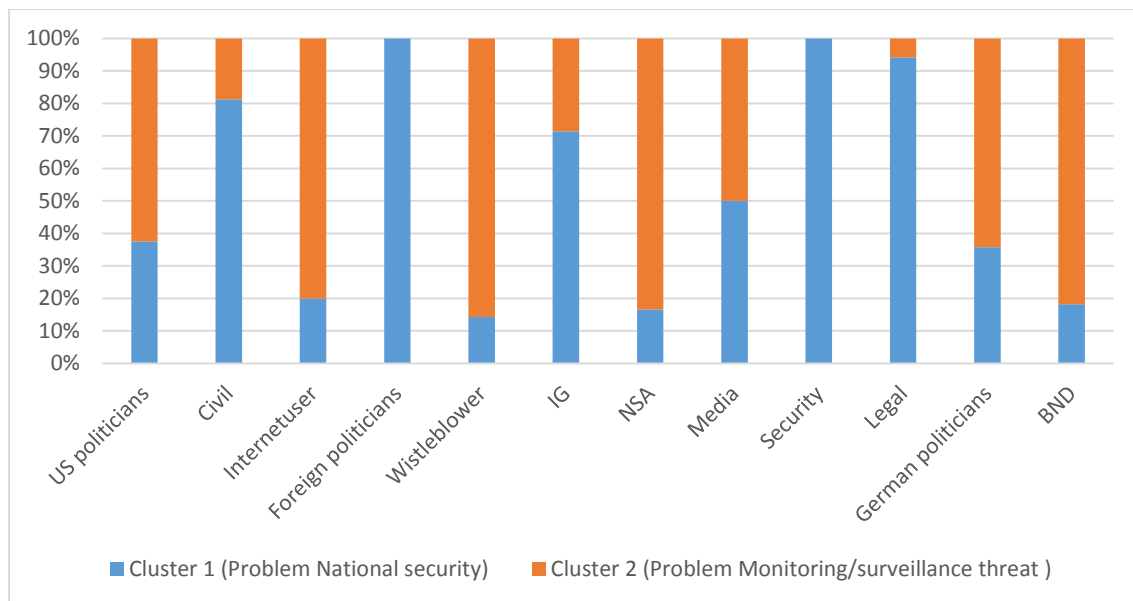


Figure 34. Sueddeutsche Zeitung: distribution of actors in the clusters for 2014.

Die Welt

For July 2014 journalists of Die Welt applied two frames when reporting about privacy. The first frame is called **Treatment Surveillance will improve safety** and included the other 68% of the articles from Die Welt. Although the cluster addressed surveillance as a treatment and not as a problem, 41% of the articles suggested monitoring/surveillance threat as a problem. Data saving is the second most important issue for this frame and was mentioned by 38% of the included cases. The second cluster included the rest 32% of the articles from Die Welt for 2014 and is called **Surveillance from security agencies**. It has 100% of the cases, which mentioned monitoring/surveillance threat as a problem and agencies gathering of data as a cause. Therefore the frame is a mixture between these two frame elements and makes it clear that monitoring/surveillance threat is connected to security agencies and not to Internet companies. Further this frame address also misuse of powers as part of the bigger problem in 94% of the cases. The evaluation gives a face to these problems as it states that NSA system is become a massive and invasive surveillance machine in 64% of the articles.

The distribution of topics is in line with the interpretations above. The first frame called surveillance will improve national security is used by 75% of the articles discussing technology, data selling and profiling (Fig.35). The topic legacy and laws is also represented up to 77% from the first frame. Further all of the suggested privacy protection

measures are discussed in this frame, which indicates that they were not discussed in depth and were only mentioned as part of an articles with a positive attitude towards surveillance. Another explanation for this is the fact that much of the German politicians reacted to the revelations, suggesting BND has to be equipped with the necessary technology in order to counteract the surveillance activities from other countries. The second cluster, called **Surveillance from security agencies** and is used to frame 93% of the topics about international relations. This is due to the fact that the revelations from the NSA scandal remained a highly discussed topic also in 2014. Debates about the implications of the scandal on the German-American relations shape privacy discussions in 2014.

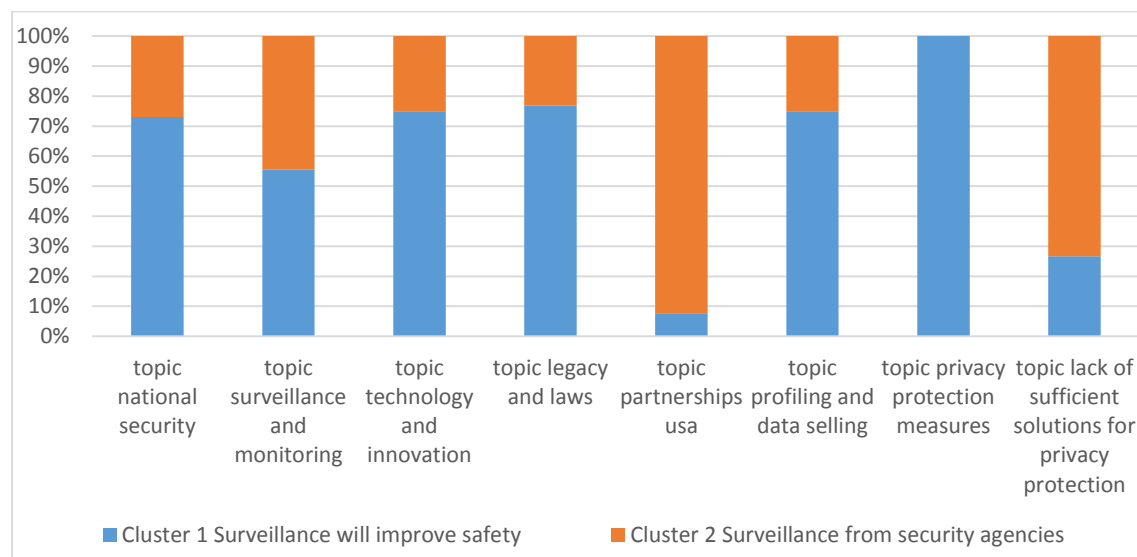


Figure 35. Die Welt: Distribution of topics according to the frames for 2014.

The distribution of actors across the different frames on Figure 36 shows that all of the security actors were part of the first frame, whereas the second frame included all of the BND actors (N=11). German politicians were evenly distributed across the two frames. The second frame included most of the NSA actors (AF:13 N=16) and US politicians (AF:12 N=18), again showing its orientation towards the NSA scandal. The first frame included most of the civil society actors (81% AF:17 N=21) and foreign politicians (75% AF:9 N=12). Supranational institutions were also part of the discussion and were framed by the first cluster.

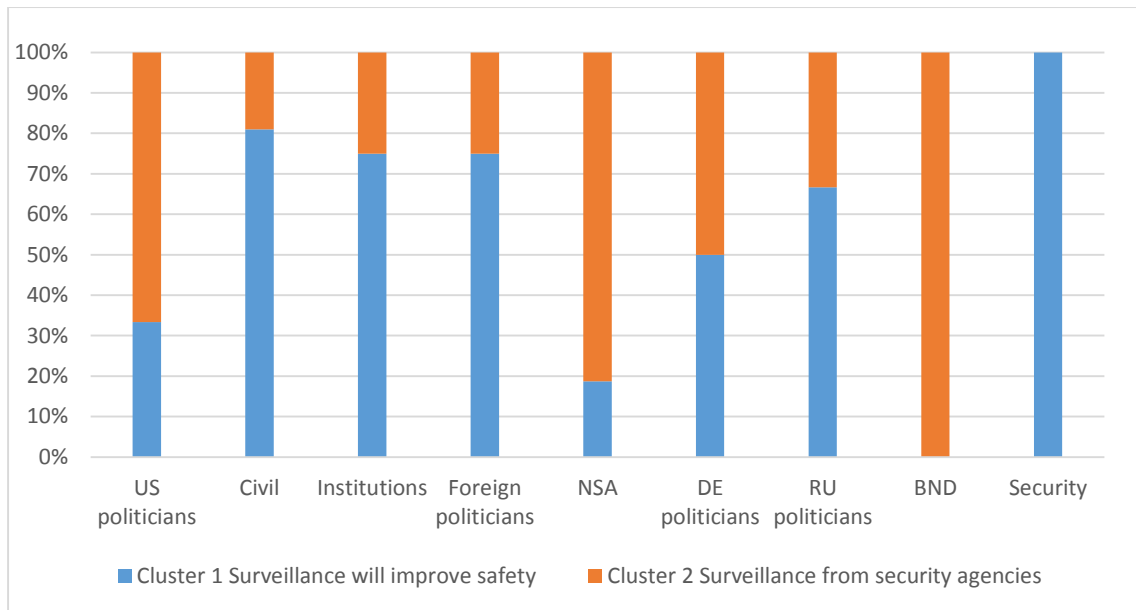


Figure 36. Die Welt: distribution of actors in the frames.

The Daily Telegraph

The hierarchical cluster analysis for Daily Telegraph in 2014 revealed a two cluster solution as the most appropriate. The first cluster consists of 60% of the analyzed articles for the period and thus was more influential for the structure of privacy discourse. It is called **Cause National security** and discusses the fact that privacy has to be reduced in order to improve security in 43% of the cases. Further the cluster identifies monitoring/surveillance threat and national security as problems in 42% and 33% of the cases. The solution goes via ‘increasing monitoring will make us feel safer’, mentioned again by 33% of the cases. The second cluster includes 44% of the articles for this time sample. It is called **Complicated regulation of privacy online** and considers Internet privacy as a problem in 95% of the articles. Technological development is addressed by 90% of the articles as the cause of the identified privacy problems. In particular interesting is the fact that unlike all the other newspapers Telegraph’s frames are not influenced by surveillance or misuse of powers by security agencies.

This is confirmed also by the distribution of the topics across the two frames on Figure 37. It shows that 87% of the discussions about surveillance and monitoring were framed by the **National security** frame. Therefore it could be assumed that Daily Telegraph did not provide critical discussions about surveillance applied by security agencies as all the other newspapers did. On the contrary it frames most of the surveillance issues in a

positive light as a necessary condition for ensuring security. Further most of the national security topics (80%) were also framed using the first cluster. The second frame **Complicated regulation of privacy online**, was mostly used in the coverage about hack attacks (88%), as well as about technology and innovation. This is in line with the focus of the frame itself. Further 67% of all articles discussing privacy protection measures, profiling and data selling are framed using this second cluster. The results show that Telegraph blames actors connected to technology and innovation for the lack of privacy.

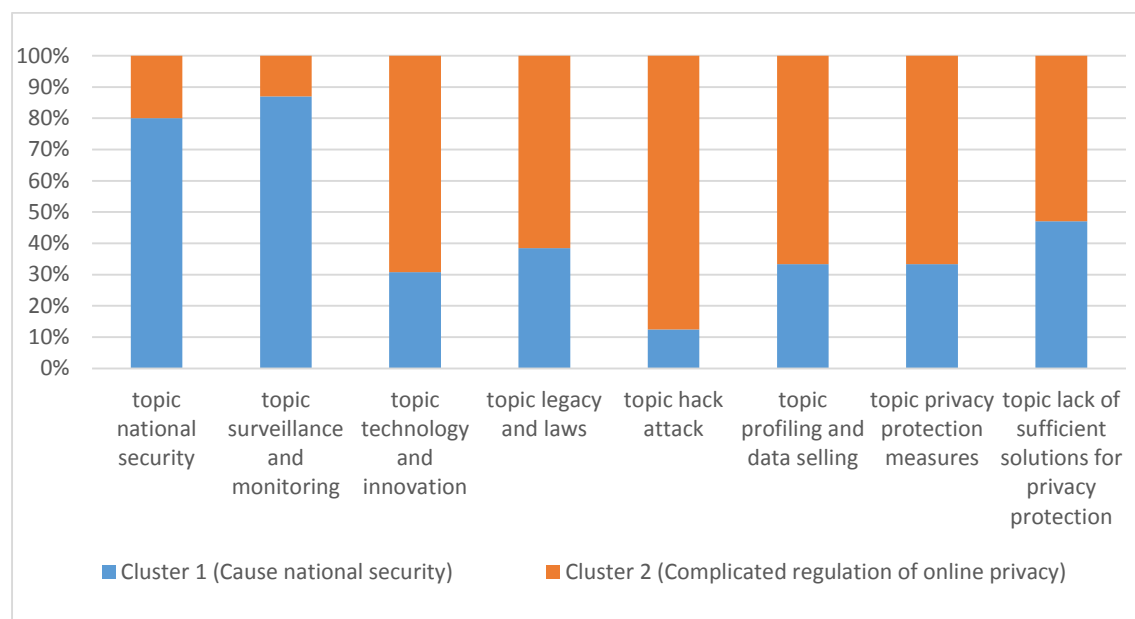


Figure 37. Daily Telegraph: Distribution of topics according to the frames for 2014.

The results from the distribution of actors according to the different frames are presented by Fig.38. In all, 92% of the Internet giants (AF:12 N=13) were included exactly in the second frame thus giving a final touch to the picture. Besides that 86% of the Internet user (AF:6 N=7), mentioned in the coverage of the article belong to this second frame. The first cluster-**National security** includes 88% of the US politicians (AF:7 N=8) and 88% security forces (AF:7 N=8), which is consistent with all the other identified national security frames. This shows that in particular the political elite has an interest to promote the insecurity frame as excuse for the increasing surveillance.

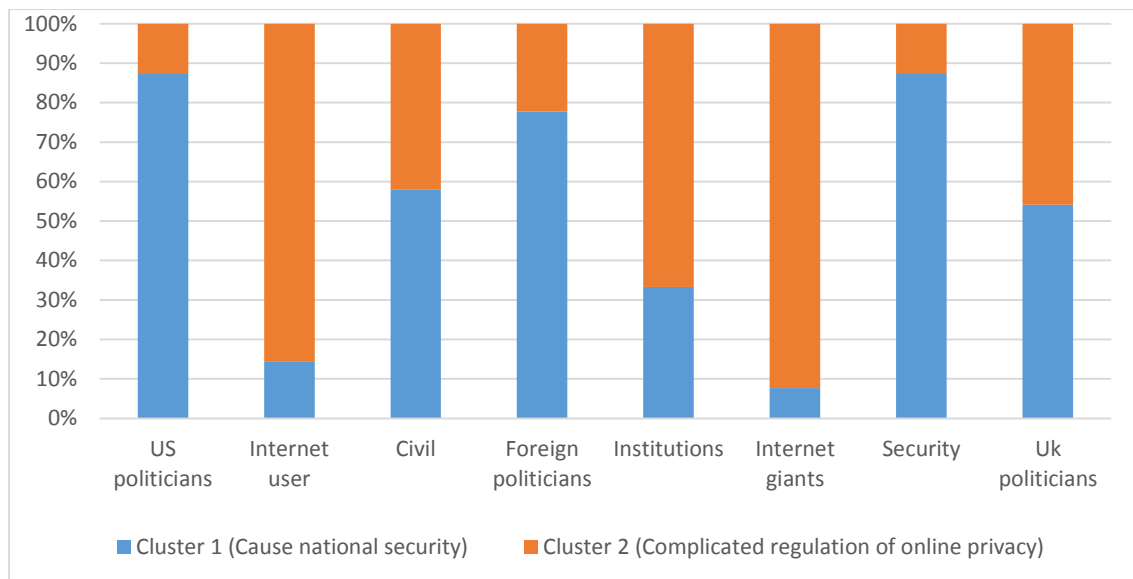


Figure 38. *The Daily Telegraph*: distribution of actors in the clusters.

The Guardian

For 2014 the cluster analysis revealed a two cluster solution for the coverage of The Guardian. The first frame is called **Insufficient privacy legislation needs improvement**. This frame is composed of 47% of the cases, which view the national legal basis as not concrete enough to be able to regulate privacy and 47% of the articles which suggest an improvement of national privacy laws. This makes the frame very consistent in its message about privacy regulations. Further the frame emphasizes the need for a better implementation of EU privacy laws in 41% of the cases. Besides that almost half of the articles criticize existing regulations, not suitable to regulate the use of personal information. The second cluster of Guardian coverage includes 68% of the analyzed articles. It is named **Monitoring threat**, because 91% of the included cases criticize regular surveillance from security agencies that increase security but threatens privacy. This frame considers that this problem was triggered by agencies invasive gathering of data in 79% of the cases. Especially politicians and legislators are responsible for allowing the monitoring to increase, suggest the evaluation element found in 71% of the articles.

The distribution of topics according to the clusters (Fig.39), confirms the interpretations above. The first frame **Insufficient privacy legislation needs improvement**, is used by 57% of the articles, which report about the legal as well as the individual measures, taken in order to protect privacy. The other cluster has definitely more influence on the

coverage of Guardian. It frames 89% of the articles, reporting about whistleblowing and an about three out of four articles, which cover surveillance and technology topics. This cluster is also used to frame all of the articles about international relations.

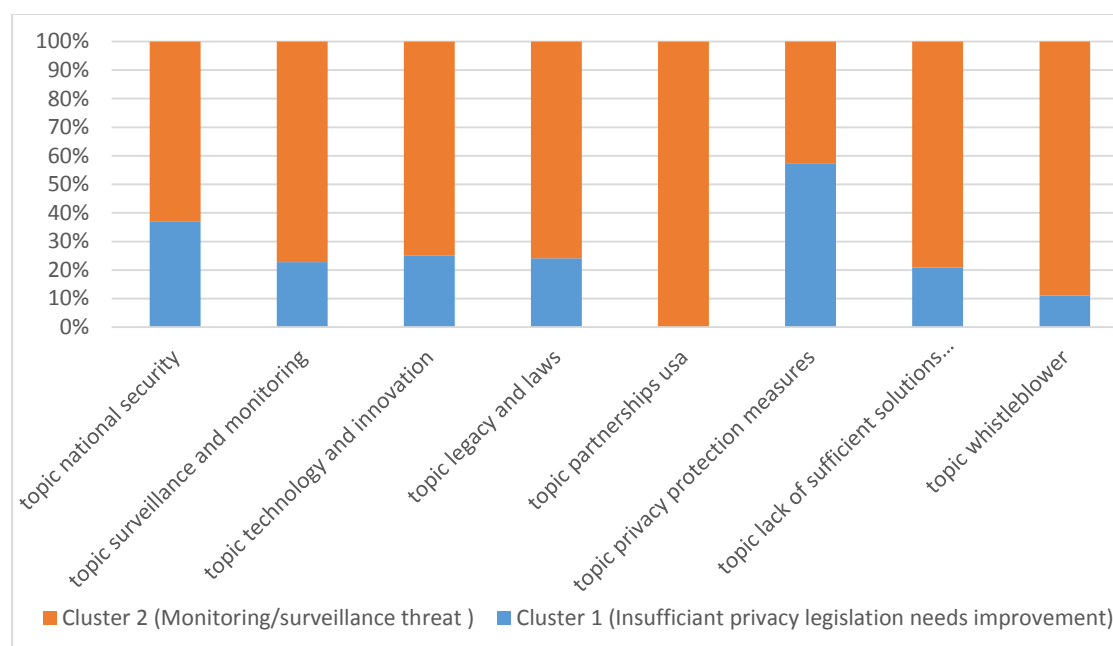


Figure 39. The Guardian: Distribution of topics according to the frames for 2014.

Figure 40 shows that the first frame about privacy legislation, was transported by 60% of the foreign politicians (AF:3 N=5) and by 55% of the civil society(AF:11 N=20). This shows that UK politicians are mostly not concerned about privacy legislation, the proposals come from other governmental officials and the society, which feeling it privacy has being invaded. The second frame, which deals with the monitoring threat, was transported by most of the actors. Especially German and the US politicians are present in this frame. The cluster was further promoted by 91% of the legal experts (AF:10 N=11) and the NSA and GCHQ security agencies (resp.70% AF:7 N=10 and 75% AF:6 N=8). This frame resembles the one identified in 2013. It is considered to be an extension of the frame, found in 2013, as this one is promoted by more actors and is more important for the privacy discourse. In addition it is also found in most of the articles of Guardian for 2014.

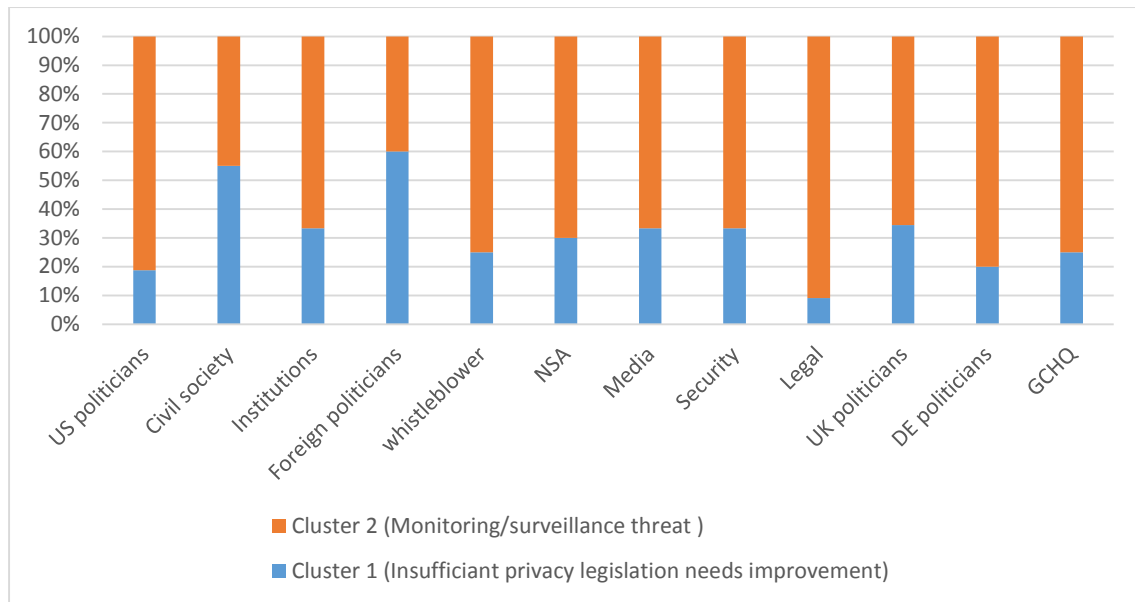


Figure 40. The Guardian: distribution of actors according to the frames for 2014..

Summary privacy discourse 2014

Privacy discourse in 2014 is still characterized by a strong concentration on surveillance as a threat for privacy in 4 out of 6 newspapers. Those, who did not use any frames concerning monitoring/surveillance threat were NYT and Daily Telegraph. NYT had a frame called **Misuse of powers**, which was more concentrated on the fact that governments use illegal measures to achieve their goal. However, this frame incorporated 57% of the cases, which refer to the increasing surveillance as a problem. It also addressed agencies invasive gathering of data in 39% of the included articles. Therefore this frame definitely resembles the one about monitoring/surveillance threat with a slight different direction. The only newspaper, which did not address the increasing surveillance in its frames was Daily Telegraph. Its privacy discussions did not change much after 2012, even on the contrary the British newspaper decreased the discourse to two frames, none of which mentions surveillance.

Again there is a huge difference between the two UK newspapers. The Guardian remains critical concerning surveillance and offers concrete measures to improve the current legal situation. Within the two German and two US newspapers there are no apparent differences. NYT and WP use almost the same frames in their privacy discourse in 2014. Both newspapers identify national security as problematical and although in slightly different directions, both criticize surveillance. NYT blames technology for privacy problems, whereas WP identifies data aggregation as a major problem and mentions that

technological innovations are one of the reasons for this issue. There is a minimal difference between the German newspapers considering the first frame. SZ is more concerned with problematical national security, while Die Welt is concentrated to provide solutions for this problem. The discussions among the newspapers are much more consistent across the newspapers compared to 2012, where one could identify only a few similarities between newspapers with the same political leaning. In sum the only outlier in privacy debate 2014 is Daily Telegraph.

Framing analysis – summary

Research question 1, asked which frames shape the privacy discourse before, during and after the NSA Scandal. In 2012, before the NSA scandal, there were three frames that structured privacy debate across all six newspapers and these were **Technology as a danger for privacy– National security as a problem – Surveillance friendly legislation as a cause for privacy problems**. 2013 was marked by one single frame, apparent in all of the analyzed newspapers and this was **Monitoring/surveillance threat**. Additionally there are also other frames, found in the coverage of the newspapers in 2013. One of them is **Whistleblower threaten by governments**, which shaped the coverage of New York Times, Washington Post and The Guardian. The other frame was found in the articles of Telegraph, Washington Post and Die Welt- the more conservative group of newspapers in this research. It addressed technology and online privacy. In 2014 there are two mutually exclusive frames that defined and formed privacy discussions: **National security as a problem – Monitoring/surveillance threat as problem**. Technology as the reason why privacy is endangered is also present among the newspapers, but is formulated differently.

- **RQ2 In what ways do newspapers' frames differ in covering privacy issues?**

Usually German newspapers tend to adopt two frames, when reporting about privacy. In 2012 they used two identical frames in their privacy discussions - **Technology as a danger for privacy** and **Surveillance friendly legislation as a cause**. Sueddeutsche Zeitung, as the most of the newspapers, discussed the problematical national security.

This frame was not present in the debate provided by Die Welt, but the newspaper was much more concrete in its **Surveillance friendly legislation**-frame, as it blamed politicians and legislators for promoting surveillance friendly legislation. Following the coverage of both German newspapers in the year of the NSA scandal, we find again Sueddeutsche Zeitung to be slightly more supportive of surveillance as a technique against criminal activity than Die Welt. The more conservative German newspaper addresses the complicated regulation of online privacy in his second frame. Both newspapers apply a frame referring to the monitoring/surveillance threats. SZ directed its frame more or less to national security agencies, while Die Welt talked about surveillance more generally. In 2014, both newspapers used the frame about the growing surveillance threat. Their second frame was differently structured. Die Welt again was orientated towards increasing security through surveillance, whereas SZ addressed only the problematical national security. The differences between the two newspapers cannot be explained with their political orientations.

Looking at the coverage of NYT and WP through the time, there are only slight differences in their reporting about privacy issues. In 2012 both newspapers defined technology and online communications as dangerous for privacy. Both, NYT and WP addressed national security in their frames, but NYT like Die Welt, was more orientated toward improvements of security through surveillance. Legislation was also found to be crucial for 2012 coverage of privacy issues. This time NYT suggested a solution- privacy legislation has to be improved. Washington Post blamed surveillance friendly legislation for privacy problems. In 2013 both newspapers used almost the same frames. This is probably due to the fact that both covered the NSA scandal extensively and WP was even part of the revelations. For both US newspapers - **Problem Monitoring threat** and **Problem Whistleblower are pursued by the governments**, defined privacy debate in 2013. The only relevant difference is that NYT third frame criticized surveillance friendly legislation, whereas WP was concentrated on the negative influence of technology on our privacy. In 2014 the differences between the two newspapers became far smaller. The following chain of frames characterizes privacy debate in 2014 in two of the most influential newspapers in America: **Problem Monitoring threat – Technological development complicates privacy regulation – Problem National security**. It is important, nonetheless, that NYT did not exactly used the **Monitoring threat** frame, but **Problem Misuse of power**. However, its frame addressed misuse of powers as part of

monitoring activities. It is important to mention that there is no such a huge difference between the political orientations of the newspapers, as in the case of the German or UK newspapers. This is due to the fact that US have no influential conservative newspapers besides Wall Street Journal, which articles cannot be accessed online. **H3 states that all US newspapers will frame privacy during NSA scandal connecting it to national security and international relations, rather than focusing on surveillance problem.** This hypothesis was rejected taking into account the discourse, provided both US newspapers. None of them mentioned National Security in its framing of the coverage about privacy in 2013.

The two UK newspapers applied significantly different frames throughout the years. Alike NYT, Guardian also used a solution-frame in 2012, which stated that privacy legislation has to be improved, in order to provide an adequate protection. On the other hand, Telegraph applied the same frame as Washington Post, which defined surveillance friendly legislation as a cause for privacy problems. Further Telegraph used a frame, which views technological development as a danger for privacy. Guardian speaks more generally and goes in direction legislation. It uses the frame **Complicated regulation of online privacy**. Both frames are similar. The most influential frame for Telegraph is **National Security** as a problem, while in 2012 Guardian has already established a critical discussion about monitoring and surveillance. Privacy events in 2013 increase the differences between the newspapers. Guardian applies two frames, both connected to surveillance and Snowden revelations- **Whistleblower threaten by the US government** and **Monitoring from security agencies**. Telegraph on the contrary is concerned about different issues. It applies a monitoring frame, but concentrates also on data collection and improving security through surveillance. The differences between both newspapers remain the same in 2014. Guardian again addresses problems in privacy legislation in its frames. The articles of the newspaper once again reexamine growing monitoring. Telegraph sticks with its negative evaluation of technological development and in addition applies a **Problem National security** frame.

In order to validate the results from the topics analysis and to investigate if framing will follow the same tendencies, H1 will be examined again, this time on the basis of framing. **H1 assumes that privacy discourse after Snowden revelations will be more concrete in comparison to the discourse in 2012, concentrated on surveillance as a formulated**

threat to privacy and the lack of sufficient solutions. The results are partly in line with these from the topics analysis. Regarding surveillance as a formulated threat to privacy, H1 was confirmed for all newspapers except for Telegraph. Regarding the discussions about the lack of legal solutions, H1 was confirmed only for The Guardian. Although the other newspapers did not have lack of sufficient legal solution as a formulated frame many of them had insufficient privacy legislation as part of their Monitoring threat-frame (DW, SZ) or their Online privacy – frame (NYT, DT, WP).

- **RQ3 How does framing of privacy issues differ between different countries and media cultures?**

In sum there are no huge differences in the framing between different media cultures, but framing differences could be easily found within the country. There is a tendency for the British newspaper Telegraph to apply slightly different framing in its articles about privacy issues than its counterparts. The Guardian was the only newspaper, which did not address national security in its framing. This newspaper is very critical in its coverage of the measures taken to improve security and counteract terrorism. One point worthy of note, however, is that the coverage of Guardian does not resemble this of other liberal newspapers, it is much more orientated towards more privacy and improvement of privacy legislation. Generally, German newspapers used two frames in their privacy discourse throughout the years, but they still managed to address the issues covered by other newspapers. There is an interesting tendency of the German SZ to use frames very similar to the ones of NYT. German and US newspapers are rather similar than different when discussing privacy, however US newspapers mentioned national security as a problem in their frames more often than the German newspapers did. This is due to the fact that this topic is more relevant for the US media coverage overall than it is in Germany.

Personalization

Personalization is the tendency to downplay the big social, economic, or political picture in favor of personal stories, human tragedies, and triumphs that sit at the surface of media events (Bennett 2002 in Boykoff & Boykoff 2007). As a fundamental journalistic norm,

personalization will be examined in this section in order to answer following research question and verify following hypothesis:

- **RQ4 To what degree do newspapers personalize privacy discourse concentrating on a person or an institution involved in the scandal?**
- **H4 USA and British newspapers personalize the NSA scandal more in comparison to German newspapers, concentrating on Snowden or political figures.**

In this paper I am interested to find out how much newspapers used personalization bias in their articles about the NSA scandal in 2013. This is why the division of personalization in three different categories – Individualization, Privatization, and Emotionalization, as proposed by the literature, was used only for operationalization purposes. Therefore in order to create a standardized index of personalization for every article of every single newspaper in 2013, I summed the mentions of all three personalization elements for every analyzed case.

This paper finds a considerable evidence for the anticipated differences across countries and outlets that reflect the differences in the political orientation of the newspaper. First of all, the US news coverage is overall more personalized in comparison to the German reporting about privacy in 2013. The two most personalized articles for Washington Post discussed the topics surveillance and whistleblowing and had a strong focus on Edward Snowden actions after the revelations were published. Nevertheless it cannot be assumed that these articles had a more negative evaluation toward the whistleblower's cause and his actions. First the articles evaluated the disruptive influence the revelations had on US international relations and blamed politicians and legislators for allowing the monitoring to increase. The reports had a personalization index of 91,09% and 78,62%. There are three more articles that stand out with a relative high degree of personalization (around 39%) and interestingly they all deal explicitly with Snowden, his asylum request, his temporary occupation in Russia and the credibility of his revelations. The personalization in this newspaper was not orientated towards political leaders or NSA actors, but mainly connected to the whistleblower actions or his life under cover. In sum Washington Post had a personalization of almost 10,26% in its articles about privacy during the 2013 period.

New York Times had three articles, which reveal a personalization bias greater than 40%. The article, which had the highest degree of personalization consisted of 637 words. It discussed the topics legacy and laws, surveillance and the lack of sufficient solutions to protect privacy. Personalization this time was not directly referring to the whistleblower actions, as the article provided a diversity of actors, among which the president Barack Obama, former president George Bush, NSA directors, the former NSA contractor-Snowden, representatives of NGOs and supranational institutions. The personalization degree of this report is 58,02%. The other two articles with an outstanding degree of personalization were providing background information about the job of the former agent at the NSA and about his temporary stay in Russia. They both revealed an index of personalization of approximately 40%. According to the moral evaluation category both articles did not mention any negative evaluation of Snowden's actions. Both were criticizing the US government's actions and the NSA surveillance methods. In sum for 2013 the coverage of New York Times has a personalization degree of 10,18%(*M*).

While the level of personalization in the US newspapers was around 11%, the German newspapers had a clearly lower scores. The German newspaper Die Sueddeutsche had almost 5% (*M*=4,48) of personalization in its articles about the topic of privacy. Its most personalized articles range just about 35% of personalization. In contrast to Washington Post, these two articles of SZ, which revealed the highest degree of personalization, were not devoted to the whistleblower Edward Snowden. In fact they covered internal political conflicts in Germany, which were provoked by the revelations, but focused mainly on German political reactions to the NSA scandal. Further the articles did not make any evaluations. They covered the topics lack of sufficient legal solutions, international relations and whistleblower.

The level of personalization for Die Welt is even lower than in the Sueddeutsche Zeitung. The newspaper shows the lowest degree of personalization among all of the newspapers – 4,19% (*M*). Only three of its articles have a personalization index higher than 30%. These reports discuss surveillance and national security topics and have a negative evaluation of the actions of politicians and legal experts, which allow monitoring to increase. The second German newspaper confirms the tendency to personalize conflicts focusing on German politicians and different political parties and not on the main participant in the NSA scandal. This indicates that German newspapers transform the international political

scandal in a domestic one centered around the points of the relations with the US and the balance between security and privacy.

Looking at the coverage of the British newspapers Guardian and Daily Telegraph, the differences across newspapers are as expected. For both newspapers the level of personalization is relatively high. The differences in the amount of personalization between The Guardian and the US newspapers is bigger than that between Telegraph and the US newspapers. This is not surprising, since all of the results, discussed in the framing and topics section above suggest that The Telegraph has been considerably more supportive of the UK government and possibly reflected the political agenda in its coverage about the NSA scandal. Telegraph has 11,4% (*M*) of personalization in its privacy discourse in 2013, which is the highest degree among all of the analyzed newspapers. Guardian on the other side has only 9,41% (*M*) of its coverage devoted to personal narratives. Interesting appears to be the fact that one of the articles of Guardian has the highest degree of personalization overall. It has a personalization value of 99,67% and it covered only the whistleblower topic. This article discussed extensively Snowden's family and his problem to find an asylum and was according to the evaluation category highly critical in its evaluation of the US government, because of the use of coercive means to force countries to comply with their political decisions. Daily Telegraph has three articles in total, which had personalization greater than 50%. All of the articles discussed surveillance as well as national security and two of them had a negative evaluation, suggesting that Snowden's revelations help US enemies.

To summarize it altogether Daily Telegraph coverage of privacy in 2013 has the highest personalization degree not only compared to its UK counterpart The Guardian, but also internationally. The US newspapers are more personalized than the German ones, however none of them stands out, as both newspapers tend to devote almost the same amount of coverage to personal narratives. Like the US newspapers, the German did not differentiate so much regarding the amount of personalization, included in their coverage. Remarkable is however their tendency to personalize stories that did not directly deal with Snowden or the NSA as major actors in this disclosure scenario. This is something that differentiates the German coverage from the other newspapers. Besides this fact, the personalization degree for the German newspapers is almost neglectable, going around 4,5%. Interestingly, The Guardian had also compared to the German newspapers a higher degree of personalization – 9,41%, but it is also the lowest among all the other

newspapers. This could be due to the fact, that this newspaper was highly involved in the scandal and tried to justify Snowden's position. It also included personal interviews with the NSA contractor emphasizing its delicate situation and the inaccurate and cruel measures applied by the US government in order to catch him. Again, however, the results confirm that this newspaper is less biased than The Telegraph and more similar to the US papers.

Finally, with regard to the hypothesis, the expectations are largely confirmed by the results of the analysis, showing that **USA and British newspapers rather personalize the NSA scandal, concentrating more on Snowden or political figures**. Firstly, this is due to the strong involvement of the US newspaper Washington Post and the British Guardian in covering Snowden's revelations and giving voice to critical discourse about NSA's right to aggregate and analyze personal data without a concrete purpose or a terroristic suspicion. Secondly, the results suggest that the US and the UK newspapers concentrate more on individuals involved in the scandal, which may divert attention away from political problem.

Discussion

This study set out to examine how different independent national newspapers framed privacy, comparing their coverage during three different periods of time 2012, 2013, 2014. The goal of the analysis was to explore, which frames characterize privacy discourse during the years and if the NSA scandal provoked more concern about privacy one year after the revelations. Therefore this paper provides an in depth investigation on how media frames developed across the defined periods of time, regarding the problems identified for privacy, their nature and causes and solutions were proposed for improving the current situation.

In contrast to previous research about the US and British media reporting on intelligence topics (Bakir 2015, Branum & Black 2015, Qin 2015, Hillebradt 2012), this paper found out that US newspapers devote a huge amount of their overall coverage in July 2012, 2013 and 2014 to privacy issues. Snowden revelations had probably the greatest impact on the coverage of US newspapers, since privacy topics are central in their coverage in 2014, compared to all other newspapers. Overall the increase in the reporting about

privacy in 2013 did not last longer even for The Guardian. Telegraph has one of the smallest amounts of privacy reporting during all of the periods. Even though privacy events in 2013 seem to have an effect on its overall coverage, the increase is still not so significant.

The first research question asked which frames shape privacy discourse before, during and after the NSA Scandal. The study revealed that in 2012 public debate was focused on few specific frames, which appeared to be dominant. These were **Technological development endangers privacy, Surveillance friendly legislation and National security.** The results confirm the outcomes from Holmlund (2014), Huijiboom and Bodea (2014), and VanHekke (2014) discourse analyses. For 2011-2012 debate Holmlund also suggests a focus on the Internet user and the complicated situation with the Internet regulations (Holmlund, 2014). This closely relates to the connection between privacy and Internet as well as to the difficulties, new communication technologies create for privacy regulators, found in this research. Van Hekke (2014) also confirms the complicated situation with technology and narrows down the discussion, emphasizing the confusion through the launching of new services such as Google Glass. The public debate in 2012 explained the cause of privacy problems, by the fact that laws were postulated in order to combat terrorism and criminal activities and therefore allow new and more surveillance techniques (Holmlund, 2014). This corresponds to the frame identified in this paper - Cause surveillance friendly legislation. The national security frame reflects previous results, which suggest that the topic of how much security we desire together with the belief in the prevention of future terrorist attacks (Huijiboom & Bodea 2014, Guasti & Mansfeldová, 2014) characterize privacy discussions for governments, the media and individual citizens.

2013 was marked by one single frame, apparent in all of the analyzed newspapers - **Monitoring and surveillance threat.** Again this frame is in line with what Holmlund (2014) identified as a problem in 2013-2014 privacy debate. The scope of surveillance is growing and it seems to have set a standard (Holmlund, 2014). Considering the second frame, present in the privacy discourse provided by the newspapers there is a clear differentiation based on the political orientation of the newspaper. New York Times, Washington Post and The Guardian used **Whistleblower threaten by governments** to frame the rest of their articles in 2013, whereas Telegraph, Washington Post and Die

Welt- the more conservative group of newspapers, addressed **Technology and online privacy**. The results show a trend for more conservative newspapers to focus on the influence of technology on privacy and blame technological innovation for the delicate situation with citizens' right to privacy.

On the basis of Holmlund (2014) comparative analysis of privacy discourse during 2011-2012 and 2013-2014, this paper suggested that **privacy discourse after Snowden revelations will be more concrete in comparison to the discourse in 2012, concentrated on surveillance as a formulated threat to privacy and the lack of sufficient solutions (H1)**. This hypothesis was examined two times, once regarding the topics and a then in order to validate and compare the results with those from the framing investigation. H1 is confirmed by the topics results for all newspapers except for The Telegraph and NYT. Framing on the other side supports the results from the topics analysis only for the first part of the hypothesis. Regarding the frame **Lack of legal solutions** H1 was confirmed only for the coverage of Guardian in 2014. It is true that the debate in 2014 includes more topics and is mainly concentrated on surveillance, national security and the lack of privacy legislation. In 2014 discourse nodal points are surveillance, national security and legislation. These signs are closely linked, because an increasing surveillance neglects privacy and leads to a rather negative opinion about the impact of legislation (Holmlund, 2014).

The second research question examined in what ways newspapers' frames differ in covering privacy issues. It appeared that usually German newspapers tend to adopt two frames, when reporting about privacy. In 2012 both newspapers used the frame **Surveillance friendly legislation**, which is due to the heated discussions in Germany at that time about the controversial revisiting of the Registration Law. Both newspapers provided a very identical privacy discussions in 2012 centered around technology and legislation. Die Welt was slightly more critical towards the German politicians, blaming them and legislators for promoting surveillance friendly legislation. US newspapers provided also very similar privacy discourses in 2012. Both newspapers defined technology and online communications as dangerous for privacy and addressed national security in their frames. The results suggest that legislation was also found to be crucial for the US coverage of privacy issues in 2012. In the UK for Daily Telegraph the most influential frame in 2012 was **National Security** as a problem, whereas Guardian has

already established a critical discussion about monitoring and surveillance. The two UK newspapers applied significantly different frames throughout the years, with Guardian more similar to NYT.

During the NSA scandal, Sueddeutsche Zeitung appeared to be slightly more supportive of surveillance as a technique against criminal activity than Die Welt. The third hypothesis of this paper assumed that all **US newspapers will frame privacy during NSA scandal connecting it to national security and international relations, rather than focusing on the surveillance problem (H3)**. This hypothesis was rejected, because none of the analyzed newspapers with exception of Telegraph have mentioned National Security in its framing in 2013. On the contrary both US newspapers provided an extensive and critical discussions of the events and addressed related problems like legislation. This outcome challenges results from previous studies, which suggest that mainstream media in the US associated the NSA incident with issues of national security and international relations (Qin 2015, Wu 2014) and presented Snowden mainly as a traitor (Just and Crigler, 2014). Considering framing, media did not follow the political agenda in US. Only in UK privacy events of 2013 increased the differences between the newspapers. Guardian applied two frames, both connected to surveillance and critical of security agencies, whereas Telegraph was more conform to the political agenda coming from the Cameron administration. Its more conservative orientation probably influenced its coverage about the scandal. This is linked to Britain's entrenched culture of official secrecy, GCHQ's partnership with NSA in the mass surveillance as well as the political pressure from Cameron administration on the media (Bakir 2015, Greenwald 2014).

In 2014 the differences between the two British newspapers remained the same. Most of the newspapers applied two frames for their coverage of privacy issues with the exception of the US newspapers. The two major frames for the debate provided by all newspapers are **National Security** and **Monitoring/Surveillance threat**. However, Telegraph did not discuss surveillance, but rather the problematical regulation of privacy in an online context, which again reflects the results from previous research, which suggest that most of the British newspapers were highly supportive of state surveillance. The differences were caused by each newspaper's ideology, news values and audience considerations (Branum & Black 2014)

How does framing of privacy issues differ between different countries and media cultures? Interestingly this study found more differences within the country itself as between the countries. Nevertheless there are some unusual strategies applied by certain newspapers that are worth to mention. First during all of the analyzed periods, The Guardian appears to be the most critical of the US and UK governmental authorities compared to the other newspapers. It was the only one, which was concerned with the increasing surveillance before the NSA scandal. The newspaper followed the tendencies found in the reporting of the other newspapers, but always addressed monitoring from security agencies as a problem and the need for an improvement in the legislation. Branum and Black (2015) state that the reporting strategy, employed by Guardian is very critical of NSA surveillance and intends to create shared beliefs towards Snowden's revelations among its readers. One point worthy of note is that the coverage of Guardian does not resemble this of other liberal newspapers. The same is true for Telegraph. While The Guardian at least used frames, popular also among the other newspapers, Daily Telegraph was completely different in its reporting style. It does not resemble other newspapers defined as more conservative. The newspaper appear to be mainly concerned about the data selling and surveillance applied by Internet giants. This is confirmed by the fact that the newspaper almost did not mention the UK political actors in its reporting about privacy in 2012. It could be assumed that Telegraph conservative orientation influences its coverage about privacy not only during the scandal, but also in general as it always addressed the national security problems and the need of surveillance to improve citizens' security in its frames. This result is in line with previous studies (Patley 2014, Bakir 2015, Branum & Black 2015, Wahl-Jorgensen & Hunt 2012) showing that Mail, Sun and Telegraph tried to undermine the Guardian cause and to support the government's agenda (Patley, 2014). They underestimated the significance of Snowden's revelations and the unfair pressure from the government on Guardian. There is an interesting tendency of the German SZ to use frames very similar to the ones of NYT. Although US newspapers used National Security-framing more often in their coverage than the German did, they appear to be very similar in the privacy discussion, they provide though the years. The newspapers of both countries addressed a wide range of privacy issues in their frames and defined **National Security**, **Technology endangers privacy** and **Monitoring/surveillance threat** as the most important for the privacy debate. The findings deny the assumptions based on current research, which shows that American media has defended NSA and the US administration in their spying operations

(Qin, 2015). On the contrary this analysis shows they provided a variety of topics and frames that did not always supported the political agenda.

The following hypothesis reflected the statements above and assumed that **because of the entrenched culture of official secrecy, reports about privacy protection and privacy violations before and after the Snowden leaks will be less visible on British and US newspapers than in German (H2)**. This assumption was rejected for the relation German - UK newspapers and partly supported for the comparison of German with US newspapers. The results suggest a tendency of the German newspapers (particularly clear for Die Welt) to report more about privacy protection and privacy violations than the US newspapers. The two British newspapers are excluded from this trend as they reported more frequently about this issues. Although the hypothesis is verified only for Die Welt the results suggest a tendency of a slight increase in the German coverage about these topics in comparison to US newspapers. Recent research (Hewitt and Lucas 2009, Qin 2015) on how legacy news in US cover intelligence issues also came to similar results (Hewitt and Lucas 2009, Qin 2015). Hewitt and Lucas (2009) came to the conclusion that since the September 11 attacks the dominant frame in US media coverage of intelligence issues was national security. Therefore in case of a scandal as the one in 2013 they will not cover bipartisan issues or personal privacy protection issues (Qin, 2015).

The last part of this paper investigated the NSA scandal in particular, focusing on **whether newspapers personalize privacy discourse concentrating on a person or an institution involved in the scandal?** Based on the literature about the coverage of whistleblowers in national newspapers (Branum & Black 2015, Bakir 2015, Thompson 2000, Boykoff 2006, Just and Crigler 2014), I assumed that **USA and British newspapers personalize the NSA scandal more in comparison to the German newspapers (H4)**. Overall The Daily Telegraph coverage of privacy in 2013 had the highest personalization degree not only compared to its UK counterpart The Guardian, but also internationally. Just & Crigler (2014) suggest that framing scandal coverage around the guilt of one person may also trivialize the story. Thus in order to direct attention away from institutional failures as it was the case with the role of GCHQ in the NSA scandal, the newspaper blames the problem on “a few bad apples”, in this case Snowden (Just & Crigler, 2014). The same strategy was applied by US mainstream media in covering the Abu Gharib scandal (Bennett et al. 2007 in Just & Crigler, 2014). US

newspapers are more personalized than the German, but none of them stands out, as both – WP and NYT, tend to devote almost the same amount of their coverage to personal narratives. This is also true for the German newspapers, which have also similar small personalization values. Their personalized articles don't deal directly with Snowden or the NSA as major actors. In return they tend to personalize German politicians, transforming the American scandal to an inner political German conflict. For the lower personalization degree of German newspapers there are two possible explanations. First they did not recognize the NSA scandal as directly influencing domestic policy, although it created some tension in the political relations between concurring parties. Secondly, German politicians didn't want to drive public attention away from the topic. Compared to German newspapers, The Guardian also had a relative high degree of personalization. However, this can be attributed to the fact that the newspaper was highly involved in the scandal and published personal interviews with the NSA contractor in order to justify his cause. As Branum & Black (2015) suggest, in order to sustain its journalistic integrity Guardian needed both to justify the publication of the leaks and to defend the contractor and itself against likely attacks. In sum, the expectations of this paper are confirmed by the results of the analysis, showing that USA and British newspapers personalize the NSA scandal more compared to German ones. The results are also in line with previous studies, which stated that American media was behind the Obama administration in the NSA scandal and defended the massive surveillance (Grey 2013 in Qin 2015). Bakir (2015) also pointed out that most of the UK newspapers were more negative towards Guardian's publications and Snowden. However it is true that for all newspapers the personalization degree was not as high as expected although it confirmed the assumed tendency. Thus it cannot be concluded that privacy discourse was so personalized that it looked from an individual perspective, disregarding larger thematic contexts as Boykoff & Boykoff (2007) found out in the climate change coverage. Nevertheless Wahl-Jorgensen & Hunt (2012) suggest that personalization is necessary in some cases for enabling structural critique. The high personalization in some cases could be also due to the strong involvement of the newspaper (like Washington Post and Guardian) in the scandal itself. Guardian and WP gave voice to a critical discourse about NSA's right to aggregate and analyze personal data without a concrete purpose or a terroristic suspicion and therefore should defend their position.

In summary, privacy was indeed framed differently over the years, however there were no huge differences between the countries. Apart from Britain there were no extreme differences between the two German and two US newspaper considering their political orientation. Nonetheless the paper found that the framing of SZ resembles the reporting of NYT. Remarkable is that Die Welt applied such a framing of privacy issues that it could be eventually interpreted as more critical of the German government. When comparing the frames, used by the British press, it would be reasonable to conclude that based on the frames it seemed like they were not covering the same events. The analysis revealed a huge gap in the reporting strategies applied by Guardian and Telegraph in 2013 and 2014. In particular in cases of political scandals these differences become more apparent. In fact, it seems that in UK privacy discourse depends much on the political orientation of the newspaper and thus the public attention can be shifted from the protection of privacy from surveillance to the protection of national security with surveillance.

Conclusion

In light of the recent events as the NSA scandal and attempts for reforms in the EU privacy legislation, the purpose of this study has been to examine the frames, implemented in the articles, published by Washington Post, NYT, Die Welt, Sueddeutsche Zeitung, Daily Telegraph and The Guardian between 2012 and 2014 that address privacy issues. Framing of these leading newspapers has been analyzed in order to understand the structure of the European and American privacy debate as well as to discuss possible differences in the coverage provided by certain newspapers.

In sum, it can be concluded that media reporting responded to the current events on the privacy landscape in Europe and in the United States. Articles reflect current updates in privacy laws as well as current political scandals like the one of NSA and Snowden. A hierarchical cluster analysis based on the framing theory of Entman (1993) indicates that privacy debate has evolved throughout the years from discussions centered around technology, legislation and national security to more surveillance orientated discourse. A major change in the media debates was experienced by the transition from 2012 to 2013. Whereas 2012 was marked by discussions about technology as a danger for privacy, 2013 experienced a great increase in the surveillance reporting, independently of the political orientation of the newspaper. Privacy debate in 2014 arise from a combination of both

discourses. Although in 2014 media discourse is marked by national security and technology problems, surveillance is also an important part of the overall framing of privacy in the newspapers. This is an indication that privacy scandals in 2013 had an impact on the privacy reporting of different media outlets. Of course, different newspapers had a slight different interpretations of these trends. The variations cannot always be explained based on the political orientation of the newspaper. However, in case of Britain this study found significant differences in the privacy discourse provided by The Guardian and The Daily Telegraph, which could result mostly from their different political leaning. In particular more conservative newspapers used the technology centered frame more often than newspapers with a more liberal orientation. Apart from national security and technology, a frame that appears to influence privacy discussions over and over again throughout the years is legislation. Most of the newspapers blamed surveillance friendly legislation for the privacy problems connected to Internet or intelligence agencies. This is due to the fact that after 11 September 2001, new security strategies have been introduced, with new technology and more financial support, in order to enable more intensive and comprehensive surveillance to control the movement of suspect citizens.

In sum considering the framing, articles managed to address the most important topics for the current period of time, but failed to provide an extensive discussion of the multifaceted problems connected to privacy. In many cases newspapers tended to simplify the complexity of Internet privacy, concentrating primary on the imbalance between Internet giants and Internet users thus providing only one part of many facets of the issue. Considering the topics articles failed to provide Internet users with strategies for selfregulation and overall didn't discuss privacy protection measures in depth. Privacy debate was much more concentrated on naming the problem or the cause for the issue than suggesting solutions for its prevention. Nevertheless most of the articles addressed the complicated situation with the existing privacy laws that are not adequate to protect privacy on- and offline.

Shortcomings

Having said all this, the current paper is not without shortcomings. The study results provide information on the design and structure of privacy reporting in the main national

newspapers in three western democracies – Germany, US and Britain. Although it is assumed that these newspapers also influence other media, no generalizations on the media spectrum in any of the above mentioned countries can be made. Further because daily newspapers don't have the possibility to provide an extensive critical discussion of privacy topics such as weekly newspapers or news magazines does not mean that problems, causes or alternative solutions will not be debated elsewhere in the media landscape of the country. However, since the selected newspapers are among the world's most respected and influential newspapers, which supply many citizens with the most important information of the day, the statements of this paper about the framing and the privacy coverage as a whole are still quite relevant, since the reported events and the tenor of the expressed opinions are likely to build a basis for further discussions.

Other limitations relate to the design of the study and the method used for the evaluation of the results. First considering the data collection it was extremely complicated to access privacy articles from Sueddeutsche Zeitung. Its online archive did not allow for results to be narrowed by specific characteristics of the articles and did not contain any information about articles length and position in the newspaper. Therefore I did not analyze this category for SZ and article length was measured manually. In contrast to SZ all other newspapers' articles were accessed using the LexisNexis search engine. However, in the case of the US, there are no internationally recognized and influential national newspapers with a more conservative political leaning apart from Wall Street Journal. Unfortunately, the newspaper is not present in any archives free of charge and was therefore excluded from the analysis. In its stead I took Washington Post, which is not considered to be a conservative newspaper, but in comparison to NYT, it represents more conservative viewpoints. Therefore the international comparison of the group of newspapers with more conservative political leaning was complicated and cannot be trusted without considering the fact that WP could be also viewed as liberal newspaper.

Another note refers to the cluster analysis used for the extraction of frames. This method reveals only dominant frames in the media coverage of privacy issues and thus neglects privacy frames that appear for a short time in connection to a certain event. In the case there is a counter-framing that could not develop itself to a strong dominant frame, it will be ignored by the cluster analysis.

The final point refers to the method applied for the conceptualization and operationalization of the personalization concept. The evaluation was in many cases simplified by using a straightforward method that connects personalization degree to number of words in an article. Further as recent research on personalization in political communication showed, it is a multi-faceted phenomenon and cannot be comprehensively addressed by capturing only few parts of it. However, this study examined personalization rather as a secondarily aspect of the privacy conflict in 2013. As the purpose of this concept was only to further elaborate and complement the investigation of the structure of privacy debates, personalization could not be addressed more comprehensively. Its function was only to provide information on whether there is personalization in the NSA scandal at all and if some newspapers used personal narratives more often than others.

Future research

Because of the study limitations the collection of the articles published in July 2012, 2013 and 2014 was not exhaustive. Long-run studies are in particularly necessary in order to extend current research, which concentrates only on a particular event connected to the issue of privacy and to illustrate how privacy discourse shifts over a long period of time. An exhaustive survey of the media coverage during these three periods of time will allow a much more precise and elaborated approach to privacy frames, one, which could address the occurrence, structure and course of the frames in privacy discourse.

A small improvement of this study will also be to concentrate on a certain aspect of privacy such as Internet privacy or privacy concept related to surveillance from intelligence agencies. This would allow to make more concrete statements about the coverage of privacy issues and to include frames that would not appear as dominant, when investigating privacy as a more general term. Another possibility to investigate also weaker frames is to conduct a cluster analysis for weeks and not for a whole month, where marginal counter frames could be swallowed by the dominant ones. Further considering the selected newspapers and the results from this study, it would be interesting to analyze framing during the exact same periods of time but this time concentrating only on the British media landscape. The results of this paper suggest that there might be a stronger relationship between the political orientation of the newspapers and privacy discussions in particular for the British media. This will allow a comparison

of privacy topics in relation to political leaning, readership and newspaper type. For the interpretation of the frames it would be particularly interesting to connect the media discourse to media systems as defined by Hallin and Mancini (2004).

Another interesting point is to continue building on this study, now a few years after the European Commission proposed a comprehensive reform of data protection. The completion of this reform is a policy priority for 2015. The objective of this new rules is to give citizens back control over of their personal data (European Commission of Justice). A comparative framing analysis of privacy coverage before and after the new law, can illustrate the effectiveness of the reform and also provide more information about how legislation could influence media and public discourse. In order to examine not only media frames but also individual frames and to demonstrate if there are some parallels between legislation reforms, media framing and the way citizens understand and discuss privacy it would be reasonable to examine also framing on social media. Conducting a semantic network analysis of privacy discussions online can bring more insight about the similarities and differences in privacy discourses provided by the media and by the citizens. Additionally such an approach can illustrate if newspapers frames and online frames differ in making certain framing elements more salient than other.

Certainly, this study had its shortcomings considering the design and the data collection. However, it provided a basis for investigation of media frames in an international context, a topic, which was not addressed by the present literature about privacy. It also provided some insight about the way different newspapers frame privacy connecting it to cultural and political factors of the country. As such, this study suggests new ways to investigate privacy coverage and framing of privacy in different media outlets.

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Appendix

Codebook

I. Topic, research question, hypotheses, selection unit and unit of analysis

- i. **Thema: The NSA Scandal and the Battle over Privacy: Framing Analysis of Privacy Discourse in Print Media during, before and after Snowden Revelations**
- ii. **Research question and hypotheses**

RQ1 Which frames shape the privacy discourse before, during and after the NSA Scandal?

RQ2 In what ways do newspapers' frames differ in covering privacy issues?

RQ3 How does framing of privacy issues differ between different countries and media cultures?

RQ4 To what degree do newspapers personalize privacy discourse concentrating on a person or an institution involved in the scandal?

H1: Privacy discourse after Snowden revelations will be more concrete in comparison to the discourse in 2012, concentrated on ***surveillance as a formulated threat to privacy and the lack of sufficient solutions*** (2014).

H2: Because of entrenched culture of official secrecy, ***reports about privacy protection and privacy violations*** before and after the Snowden leaks will be less visible on US newspapers than on German (2012-2014).

H3: All US newspapers will frame privacy during NSA scandal connecting it to ***national security and international relations***, rather than focusing on ***surveillance problem*** (2013).

H4: USA and British newspapers personalize the NSA scandal more in comparison to German newspapers, concentrating on Snowden or political figures (2013).

- iii. **Selection unit:** newspapers' articles from 2012, 2013 and 2014
- iv. **Unit of analysis:** article- A piece of writing included with others in a newspaper,; the introductory part of an article will be treated as part of the article and won't be coded separately
- v. **Coding unit:** newspapers' articles

II. Begriffe

NSA scandal/Snowden scandal – The US whistleblower Edward Snowden revealed June 2013, how the United States and the United Kingdom have monitored global tele- and Internet communications on a large scale.

Individualization- the total attention devoted to an individual's competence, relevant for his performance incl. professional qualities (i.e. accomplishments, knowledge, skills, and talents) and personal qualities (likeable, personable, loyal, truthful etc).

Privatization - the total attention devoted to an individual's private life as well as personal relationships/activities; distinct from professional life.

Emotionalization - refers to articles, which emphasize personal emotions (fear, anger, surprise, trust) and feelings/moods (interested, positive, strong, confused).

Privacy – In general, the right to be free from secret surveillance and to determine whether, when, how, and to whom, one's personal or organizational information is to be revealed. In specific, privacy may be divided into four categories (1) Physical: restriction on others to experience a person or situation through one or more of the human senses; (2) Informational: restriction on searching for or revealing facts that are unknown or unknowable to others; (3) Decisional: restriction on interfering in decisions that are exclusive to an entity; (4) Dispositional: restriction on attempts to know an individual's state of mind.

Surveillance – Ongoing close observation; collection of data for a specified purpose.

Privacy violations – refers to surveillance actions like espionage and monitoring, applied by the government or companies without a purpose and the consent of individuals.

III. Categories

1. Formal categories

- 1) Ser. No. (001-999)
- 2) Day (1-31)
- 3) Month (1-12)
- 4) Weekday (1-7)
- 5) Newspaper (G/T/SZ/W/ NYT/WP)
- 6) Article's length (number of words)
- 7) Newspaper page

2. Contend-related categories

1) Actors. Coded up to 6 actors per article.

1. Civil society

- (1) Protester
- (2) Internet users
- (3) Civil society
- (4) Blogger/internet activists
- (5) Whistleblower (Edward Snowden, Chelsea Manning, Julian Assange, Daniel Ellsberg)
- (6) Scientists

2. Political elite

- (1) UK political elite
- (2) US political elite
- (3) DE political elite
- (4) RU political elite
- (5) Foreign govern. authority

3. Independent elite

- (1) Members of supranational institutions (UN, EU, WTO, IMF)
- (2) NATO
- (3) Diplomats
- (4) NGOs (AFL-CIO, Amnesty International, Hacktivist, CPJ)
- (5) Federal Trade Commission (FTC)

4. Business elite

- (1) Marketing companies
- (2) Internet giants
- (3) Banks

5. Intelligence agencies

- (1) National Security Agency (NSA)
- (2) Government Communications Headquarters (GCHQ)
- (3) Federal Intelligence Service (BND)
- (4) Other intelligence agencies

6. Journalists and media members (when newspaper/employees/readers are discussed)

7. Security forces (police, military forces and all public forces responsible for the maintenance of public order)

8. Legal experts (judges, authorities, assessors)

9. Terrorists and terror organisation

2) Topics

1. **National security matters** (concepts that the government apply to protect state and its citizens against all kind of crises like terrorism, national disasters, economic crisis or crimes and etc.)
2. **Personal Privacy Protection** (articles the right of privacy of celebrities and important personas like publishing of photos of celebrities or disclosing names of spies etc.)
3. **Surveillance** (refers to actions like monitoring and espionage; it also includes physical surveillance, informational and online surveillance;).
4. **Privacy protection measures** (refers to **legal as well as individual** measures taken in order to protect privacy)
5. **Technology and innovation** (this variable refers to any kind of technological innovation discussed in an article; SNS and problems connected to their use; leader of Internet giants or tech corporations and their statements)
6. **Laws and trials** (laws or legal regulations related to privacy as well as trials e.g. between tech corporations and/or users in relation to privacy)
7. **International relations** (articles addressing the relations between US and other countries incl. articles about TTIP)
8. **Health records** (articles discussing collection of personally identifiable health information for health research)
9. **Spending on secrecy** (articles discussing budget and financial schemes for intelligence agencies funding)
10. **Hack attack** (refers to PC virus infections, hacker activities and breaches of security walls)
11. **Profiling and data selling** (refers to the analysis of people's behavior, applied by advertising companies in order to predict citizen's interests or actions. The category also refers to the selling of personal information from institutions to companies or between companies)
12. **Whistleblowing** (articles discussing informants- somebody who informs on a organization/person, engaged in an illegal activity)
13. **Copyright violations** (articles, which solely discuss any kind of copyright problems or infringements; excl. trials)
14. **Lack of solutions for privacy protection** (articles explicitly discussing the lack of legal as well as individual actions to protect privacy)
15. **Sonstige Themen** (String variable)

2) Frame Elements

1. **Problem definition** - determine what a causal agent is doing with what costs and benefits. Which aspects are addressed as problematical in the research samples? Which problems define privacy debate during each phase? Which causal agents and actions could endanger or invade our privacy?

- (1) Privacy online (it is complicate to regulate privacy online)
- (2) Loss of control (Users' loss of control over personal data; articles referring to citizens' incapacity to protect their data, because of surveillance actions)
- (3) EU implementation of privacy laws (articles discussing the implementation and harmonization of EU laws across the member states)
- (4) Lack of sufficient legal solutions (articles discussing the fact that there are no laws that regulate privacy and sanction surveillance actions)
- (5) User confusion (User's confusion with privacy policies of websites)
- (6) User ignorance (User's ignorance of privacy information on websites)
- (7) Online prints ("once you are on the Internet, it is nearly impossible to erase yourself")
- (8) Acceptance of surveillance (Surveillance is becoming more and more accepted from the citizens as well as the government)
- (8) PNR (articles discussing passenger number records)
- (9) Misuse of powers (when governments or agencies use illegal measures to achieve their goal)
- (10) Monitoring/surveillance threat (Regular surveillance from sec.agences, that increase security but threatens privacy; monitoring without a concrete purpose and the consent of individuals)
- (11) Public debate (Lack of public debate about surveillance and privacy)
- (12) National security (when security in the state is defined as problematical)
- (13) Privacy infringements by companies
- (14) Free speech (Legal borders of free speech, regulations, dangers)
- (15) Whistleblowing (whistleblower are pursued by the government and are facing legal charges)
- (16) Data saving (articles discussing data saving from companies/individuals apart from agencies or governmental data usage)
- (17) Technology (the use of certain technology like surveillance cameras or SNS is problematical)
- (18) International relations (Relations between US and other nations are defined as problematical in the article)
- (19) Free speech (articles discussing the legal borders of free speech)

2. **Causal interpretation** - identify the forces creating the problem. What causes the above mentioned problems?

- (1) Citizens' fear of terror attacks (articles discussing explicitly the society fears of terrorists and terror attacks)
- (2) National security (Articles pointing out that privacy has to be privacy reduced in favor to fight criminal activity)
- (3) Technological development (technological development is the reason why privacy is endangered; it encourages people to share more personal information and allows new intelligent forms of surveillance)
- (4) Insufficient state of privacy legislation (The national legal basis is not concrete enough and not able to regulate privacy)
- (5) Surveillance friendly legislation (Government favoring of surveillance friendly legislation)
- (6) Lack of communication about privacy protection (Insufficient information about privacy threats, protection and legislation)
- (7) Lack of transparency in SNS privacy policies
- (8) Internet privacy (Internet is a challenge for privacy legislation)
- (9) Agencies invasive gathering of data
- (10) Data selling/storing (articles discussing the fact that companies or governmental institutions sell / store citizens private data, which is a violation to their privacy right)
- (11) Whistleblowing (whistleblowing activities are causing problems to governments/military/companies because people find out about the illegal actions taking place)

3. ***Moral evaluation*** - evaluate causal agents and their effects. How were the actions of causal agents to support or invade privacy being evaluated?

- (1) Companies "harvest" and "exploit" personal information for commercial purposes.
- (2) Journalists rarely facilitate a comprehensive understanding of privacy problems.
- (3) Existing regulations are not suitable to regulate the use of personal information.
- (4) USA use coercive means to force countries (including the EU) to comply with their measures.
- (5) Mainstream media facilitate a discussion about data collection and trade
- (6) Politicians and legislators are responsible for allowing monitoring to increase
- (7) Snowden's disclosures damaged US relations with allies and affected "the importance of trust".
- (8) NSA system has become a massive and invasive surveillance machine.
- (9) Through the revelations Snowden has helped US enemies.
- (10) Surveillance helps to fight and prevent criminal activity or terrorism acts and catch terrorists.

4. **Treatment recommendation** - offer and justify treatments for the problems and predict their likely effects

- (1) “The right to be forgotten” (EU “right to be forgotten” is a solution for many)
- (2) Self-regulation of the citizens (articles discussing possibilities for people to regulate or protect privacy)
- (3) Surveillance will improve safety (Surveillance is a measure to counteract terrorism)
- (4) Better national privacy legislation (The improvement of national privacy laws)
- (5) Implementation of European legislation (EU laws have the capabilities to regulate privacy)
- (6) Harmonized legislation across nation-states (The solution for privacy regulation is harmonized international laws)
- (7) Political choices (determine the future of privacy)
- (8) Transparent policy and political decisions
- (9) Protest (Solution lies in our voices)
- (10) Open data (based on the British model)
- (11) Open debate (Communication and information is the only way to fight power misuse and unnecessary surveillance)
- (12) Whistleblowing (it is the only way to stop a massive surveillance machine)
- (13) Asylum for whistleblower
- (14) Technology (only technology can counteract massive surveillance attacks or only technology can save us from criminals)

3) Personalization

Numeric variables → It will be count how many times individualization, emotionalization or privatization are mentioned in an articles and then on the base of the biggest number of mentions it will be made an % index

Individualization	Privatization	Emotionalization
HEADLINE / TEXT	HEADLINE / TEXT	HEADLINE / TEXT
individualization Merkel	privatization Merkel	emotionalization Merkel
HEADLINE / TEXT	HEADLINE / TEXT	HEADLINE / TEXT
individualization Obama	privatization Obama	emotionalization Obama
HEADLINE / TEXT	HEADLINE / TEXT	HEADLINE / TEXT
individualization Snowden	privatization Snowden	emotionalization Snowden
HEADLINE / TEXT	HEADLINE / TEXT	HEADLINE / TEXT
individualization Cameron	privatization Cameron	emotionalization Cameron
HEADLINE / TEXT	HEADLINE / TEXT	HEADLINE / TEXT
individualization Peter Schaar	privatization Peter Schaar	emotionalization Peter Schaar
HEADLINE / TEXT	HEADLINE / TEXT	HEADLINE / TEXT
individualization Viviane Redding	privatization Viviane Redding	emotionalization Viviane Redding

HEADLINE / TEXT	HEADLINE / TEXT	HEADLINE / TEXT
individualization Keith Alexander	privatization Keith Alexander	emotionalization Keith Alexander
HEADLINE / TEXT	HEADLINE / TEXT	HEADLINE / TEXT
individualization Joseph Klapper	privatization Joseph Klapper	emotionalization Joseph Klapper
HEADLINE / TEXT	HEADLINE / TEXT	HEADLINE / TEXT
individualization Josh Earnest	privatization Josh Earnest	emotionalization Josh Earnest
HEADLINE / TEXT	HEADLINE / TEXT	HEADLINE / TEXT
individualization George Bush	privatization George Bush	emotionalization George Bush
HEADLINE / TEXT	HEADLINE / TEXT	HEADLINE / TEXT
individualization Theresa May	privatization Theresa May	emotionalization Theresa May
HEADLINE / TEXT	HEADLINE / TEXT	HEADLINE / TEXT
individualization Vladimir Putin	privatization Vladimir Putin	emotionalization Vladimir Putin
HEADLINE / TEXT	HEADLINE / TEXT	HEADLINE / TEXT
individualization party leaders DE	privatization party leaders DE	emotionalization party leaders DE
HEADLINE / TEXT	HEADLINE / TEXT	HEADLINE / TEXT
individualization party leaders UK	privatization party leaders UK	emotionalization party leaders UK
HEADLINE / TEXT	HEADLINE / TEXT	HEADLINE / TEXT
individualization government officials US	privatization government officials US	emotionalization government officials US

Abstract (German version)

Der massive Wachstum der Online-Kommunikationsplattformen in den letzten Jahren sowie die wachsende Überwachung durch Sicherheitsdienste, haben das Bedenken hinsichtlich der Eingriffe in die Privatsphäre erhöht. Medien spielen heute eine wichtige Rolle in der Debatte über mehr Datenschutz, da sie die Diskussionen über das Thema – Recht auf Privatsphäre, vorantreiben. Selten vergeht sehr viel Zeit bevor neue Eingriffe in die Privatsphäre von den Medien ans Licht gebracht werden. Diese Studie, die von Framing-Theorie von Robert Entman (1993) geführt wird, stellt die Ergebnisse einer quantitativen Untersuchung des Mediendiskurses dar für drei Perioden und drei verschiedene westliche Länder - Deutschland, USA und Großbritannien. Um das Framing der Medienberichterstattung über Privatsphäre zu untersuchen, wurden 900 Artikel in sechs der berühmtesten nationalen Zeitungen analysiert - New York Times, Washington Post, Guardian, Daily Telegraph, Süddeutsche Zeitung und Die Welt. Die Ergebnisse zeigen, dass die Artikel die aktuellen Ereignisse hinsichtlich der Privatsphäre wie die neuen EU datenschutzrechtlichen Bestimmungen oder politische Skandale widerspiegeln. Die Datenschutzdebatte entwickelte sich im Laufe der Jahre von Diskussionen rund um Technologie, Gesetzgebung und nationale Sicherheit zu einem kritischen Überwachungsdiskurs. 2013 ist gekennzeichnet durch eine starke Zunahme der Berichterstattung über Probleme mit der steigenden Überwachung. Diese Tendenz hat den Mediendiskurs in 2014 stark beeinflusst. Obwohl die Berichterstattung wieder von Themen über der Sicherheit und Technologie geprägt wurde, sieht man einen deutlichen Anstieg der Diskussion über das Recht auf Schutz der Daten und Privatsphäre.

Lebenslauf

AUSBILDUNG UND STUDIUM

01.10.2013- bis jetzt

Hauptuniversität Wien
MA Publizistik und Kommunikationswissenschaft

01.09.2009- 27.02.2013

Baden Württemberg Universität Mannheim,
Studium der Medien und Kommunikationswissenschaft mit Beifach Soziologie

15.09.2004 – 24.06.2009

Schulabschluss, Deutsches Gymnasium (73. Schule Sofia)

15.09.1997 – 01.07.2004

Russisches Gymnasium (133. Schule, Sofia)

PRAKTIKUM UND BERUFLICHE ERFAHRUNG

01.02.14- bis jetzt

Freelance Editor| inventures.eu| <http://inventures.eu/>| **Österreich, Wien**

- Dokumentieren der Best-Practice-Beispiele der startup-Community
- Berichten über die Neuigkeiten aus der Startup-Szene
- Berichten über Startup-bezogene Ereignisse in der Zielregion

02.07.12 - 31.12.12

Praktikant in der Abteilung Corporate Film, TV and Photo. Communications and Government Relations BASF Group| BASF SE|
<http://www.basf.com/group/corporate/en/> | **Deutschland, Ludwigshafen**

- Produktionsassistent bei den Foto- und Filmarbeiten Asia Pacific und BASF-Awards
- Assistenz bei Pressekonferenzen (Herbstpressekonferenz)
- Entwicklung eines Basiskonzeptes für die Produktion vom BASF Imagefilm
- Rechnungswesen und Budgetverwaltung

20.06.11- 05.08.11

Praktikant in der Abteilung Development and Research | Produktionsfirma "Oldschool Productions"| <http://oldschool.bg/> | **Bulgarien, Sofia**

- Recherche und Monitoring des Fernsehmarktes in Bulgarien, Deutschland und U.S.
- Entwicklung von originellen Konzepten von TV-Formaten für FOX Group Sender
- Entwicklung von den PR Strategien für Quiz Show Format auf dem Privatsender TV7

01.07.08- 01.09.08

Abteilung Marketing, News Indexing |TV Rekording| <http://www.aidatv.com/>|Bulgarien, Haskovo

- Telefonische und persönliche Interviews
- Marktforschung und Meinungsforschung
- Kenntnisse in Medienmarketing: Sponsoring, Promotion, Öffentlichkeitsarbeit

ZUSÄTZLICHE KENNTNISSE UND KOMPETENZEN

TECHNISCHE FÄHIGKEITEN

MS Office- Word, Excel, Access, Visio, PowerPoint| SPSS |Adobe Photoshop | Adobe Premiere | Verarbeitung und Analyse der Rating-Daten mit Rating Programmen | Führerschein Klasse B

SPRACHKENNTNISSE

- Deutsch (C1) |Bulgarisch (Muttersprache) | English (C1) |Russisch (B2) |Italienisch (A1,2)