



Project implemented by Human Dynamics in association with:
IPS Institute
AlmavivAS.p.A.
Czech Office for Personal Data Protection OPDP
Privacy International



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Communication Strategy Directorate for Personal Data Protection



Support to the Directorate for Personal Data Protection
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Introduction

Everyone has a right to privacy, is the motto of the Directorate for protection of personal data. Protection of personal data is the legal right of every citizen of Republic of Macedonia, and foundation of a modern and democratic society. This right provides better functioning of the democratic society which is based on constitutional guarantees for respecting the fundamental human rights. Having in mind the rapid development of new technologies, communicational and IT systems that create enormous number of data bases for various usage, as well as social networks, internet and other forms of communication, increased the possibilities for abusing the personal data and the right of protection and privacy. This is a global issue that reflects on our country as well and it demands constant monitoring and taking relevant actions. The fast IT development increases the meaning, purpose and need and of the Right of personal data protection and the right of privacy.

Privacy protection means organizational system with structured and organized access but also developed public awareness in the society, as a necessary condition for reactions in case of violation of the right to privacy.

Thus, the Directorate for personal data protection was created in 2005 so that it can supervise the personal data processing and to provide protection where needed on the territory of Republic of Macedonia.

Directorate for Personal Data Protection is an independent state authority with status of legal entity and is entitled to perform supervision over the legality of the processing of personal data and their protection, on the territory of Republic of



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Macedonia. This status provides and secures independence in relation to the executive, legislative and judicial authority as in relation to the local self-government authority.

It is relatively new institution that works hard on setting the principles of the Right for data protection and privacy but on the other hand there is a lack of promotion of its responsibilities. Although the Directorate serves the citizens, according the research more than half of the respondents never heard about the Directorate and those who have heard are not very familiar with its competences.

Not having very extensive and clear communication of the promotional activities about its competences disables people to be aware of its existence.

The mission of the Directorate is to inform the citizens on the right of personal data protection, to strengthen their awareness for the procedure when personal data is been abused, to investigate the necessity for the personal data gathering, and act upon citizens requests. Since it is an independent state authority with status of legal entity, all these duties should be done in a transparent manner.

In order to achieve all its duties on operational level, there is necessity to make changes in people's perception about their right for personal data protection. In that order the Directorate should communicate with the citizens in the country on several levels, thus to increase their awareness of the right for personal data protection as well as to promote the role of the Directorate as a mediator when personal data have been abused.



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1. Situation analysis

Current situation

The research that was previously conducted indicated that the awareness of the right of privacy and personal data protection is low. Almost half of the respondents are insufficiently aware for this right.

Generally, the target audience is aware of the most common personal data like Name, Surname, but on the other hand they don't know how to protect or to proceed when their data has been abused. Respondents are mostly worried for abuse of their Personal registration number.

What also lacks among citizens is awareness whether their personal data have been abused at all.

When comes to protection of their personal data, among half of the respondents there is insufficient awareness how they can do that. 26% of those who know think they should submit criminal charges to the police.

Although lots of people use the internet on daily basis, especially social networks, around 80% of respondents have very low awareness on how they can proceed when their data are abused on the social networks

This mixed situation can easily bring misunderstanding between the citizens and fear when some institutions ask for their personal data.

A lot of employees in institutions that collect personal data for their working needs don't clearly know why they are collecting personal data. Their awareness of the principles on which they are allowed to collect the data of their clients or how to proceed with it and how to insure proper protection is low.



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Key issues

- How to increase the awareness of the right of personal data protection between citizens
- How to educate the public on how to proceed when they are asked about their personal data without legal right for it
- How to educate the public on how to proceed when their data has been abused
- How to motivate and increase the interest of the journalists to cover the topic and give relevant information
- How to motivate influential groups to give support and promote the right for personal data protection
- How to inform the employees in institutions on what circumstances they are allowed to collect personal data and how to provide proper protection



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Communication strategy

The overall aims of the communication strategy is to emphasize all relevant instruments in order to raise the level of awareness for the right for personal data protection and to promote the understanding of this law and its obligations in the society in the field of personal data protection.

Additionally, the goal of the communication strategy is to promote the Directorate for personal data protection as a reliable partner in this process as well as to emphasize its competences and inform about its responsibilities.

Communication objectives:

Noticing the current situation, the level of knowledge and the awareness for the right of personal data protection, and the key issues the general objectives can be set:

- Inform and educate citizens on their right for personal data protection, but also educate about personal data in general
- Promote understanding and raise the level of awareness on the rights as well as the obligations of the society in the field of data protection
- Inform and educate about the procedures in case of privacy violation.
- Inform and educate about the role of the Directorate for the Right for personal data protection and its competences, operations and missions



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- Create positive attitude, trust and image towards the Directorate as a mediator when privacy and personal data have been abused
- To maximize levels of awareness and compliance with data protection obligations among those keeping personal data.
- Provide timely, practical and easily understood advice to individuals and organizations.
- Enhance the journalist to write on this topic

Target audience

The target audience can be segmented in two wider groups based on their needs and involvement in the process of increasing the awareness for the Right for personal data protection:

1. Primary target group - General public which is more concerned with the issues of data protection and will be directly influenced by the communication
2. Secondary target group - which indirectly make influence to the communication
 - a. **Media representatives:** Journalists and editors from print, electronic and TV media

Mass media play extremely important role in one society. They are able to influence or at some point even to create the public opinion, but also to inform and educate



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b. Influential people: Academic people, University professors, Mayors

All communities have people whose opinion is respected and taken as a serious and credible. These people can be the leaders and promoters of the right of personal data protection

c. Employees in banks, health department, etc.

Employees in banks, health departments or administration are directly involved and affected by this right. Their involvement can increase the awareness for personal data protection. Controllers can make targeted communication that will vary depending the field of work.

d. NGO's

The opinion of the non government sector is highly valued because of their independent position

Strategy Principles

The communication strategy should be based on the following key elements:

- Constant communication message throughout all channels, as well as recognizable visual identity
- Usage of variety of communication channels that will correspond to the target audience and the certain objectives
- Diverse activities should be taken regarding the target audience in order to sensitize them in proper way
- Continuing communication and awareness raising activities



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- Monitoring and evaluation should follow the activities

Communication message

The most important thing, and precondition for successful communication strategy is having a consistent communication throughout all planned channels.

In order to have consistency in communication and to have communication that will create positive attitudes and acceptance of the Directorate, there is a need for developing recognizable visual identity for the Directorate as well as consistent communication messages that will be core on which the further communication will build up

The corporate identity describes the strategic conception of positioning of the organization. It should be unique and made appropriately so that the image of the Directorate would be consistent and recognizable. In the process of creating the image we should have in mind the answers of the following questions: How do we want to behave, to communicate, to look alike – what image do we want to achieve?

In the process of building the Organizational identity, the Directorate should create or acquire a logo as well as an overall design of all printed or TV materials that will be created.

A short claim should be created as well, which will express in few words the key benefits of Data Protection or the Directorate as an organization, as well as the role / position of the Directorate.



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Communication techniques for different target audience

The protection of citizens' personal data is very important element in one society. Since the societies are becoming more and more dependent on information technologies, personal data are being collected or generated more frequently and by that the chances the data to be abused is increasing. Protection of personal data has to become an imperative.

In that manner the communication techniques should be derived from the communication objectives and relevant to target groups.

In order to achieve the set goals, a wide range of techniques are described which can be used within the context of the project.

They include:

- **Media** (TV animation/spot, programs, brochures, posters, newsletters, reports)
- **Internet** (Facebook fan page, online banners)
- **PR activities** (meeting with journalists, briefings, press releases, interviews, press conferences, BTL activities,)
- **Interpersonal contacts** (meetings, networking, trainings, workshops, presentations, etc.)



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Media

Importance of media

Mass media plays a very important role in a free society. It can play a very important role in creating or influencing public opinion, but also mass media are the most cost-effective way to inform and educate the public.

In Macedonia at the moment Television as a media is still most influential channel. Currently SITEL, Kanal 5 and Alsat. Using the television as media, allows easy and quick reaching to the wider population. This media will help to increase the awareness among the target audiences. The media should be taken as an active participant in the process due to its reach and potential to widely spread the message..

The News is among the programs with highest ratings and at the same time is the most accessible and credible media.

Additionally, soap operas are very wide spread among all citizens, so the air time before and after their airing is convenient for mass reaching.

On the other hand, print media due to its specific character should be used for more comprehensive explanation of different topics related to the data protection: about personal data, the procedures when privacy is violated, the responsibilities of the Directorate etc

In order to achieve most of the benefits that TV and print media, the following principles should be obtained:

- Building trustful relationship with the members of media
- Establishing and maintaining a network with journalists
- Providing to journalists accurate, clear, relevant information on time



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- Being part of talk shows on different TV stations and magazines

The television as Media is a great opportunity to promote the new created identity of the Directorate. Creating a TV animation or TV commercial will both help promoting the corporate identity and create awareness for the data protection issues and at the same time increase the awareness for the Directorate and its competences.

The TV executions should target different ages but always providing the main message – How to protect your personal data? The communication tone should meet the target groups, especially when addressing to younger population. All executions should be educational, informational, useful and insightful.

Radio executions

Radio is also very powerful medium that can reach very large and various audiences at once. Several different radio ads can be created that will promote different areas of data protection. Additionally, on the most influential radio stations such as Antenna, City radio, Metropolis or Club FM a talk show can be made so that people could call and ask questions, or they can send SMS with questions regarding data topics. Employees from the Directorate can be part of the program as well, or they can sponsor such shows.

Printed materials

Brochure

Brochures can provide simple information about the personal data protection and the different aspect related. The brochures can have information about:

- Personal data in general
- The role and responsibilities of the Directorate
- Procedures for reporting privacy violation
- Useful advices for better protection of personal data



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Additionally, a brochure with targeted communication can be made, so that the message can be understandable for different age groups. Since joining Facebook is available from thirteen years of age, it is very important to reach this target group and to explain to them very tangible what is data protection and privacy violation. These brochures can be made in cooperation with Ministry of Education or Ministry of Culture.

Posters

Posters can provide information about the topic and can be designed to inform people on the places where personal data is collected.

Internet

Fast expand of the digital communication, as well as numerous data bases formed in the digital world, increased the possibilities for abusing the personal data and the right of protection and privacy. This is a global issue that reflects on our country as well and it demands constant monitoring and taking relevant actions.

Macedonian population is following this world trend: at the moment there are almost 1 000 000 active users on FB, 55% are using internet, there is PC in 61,2% of the households, so there is strong need for usage of this channels for education and spreading information about the protection of personal data. Combination of various digital communication tools is an imperative in fulfilling the communication objectives due to the facts that:

1. The people we are targeting can be reached in the digital world
2. This is the place where a lot of privacy violation happened.
3. It is very flexible channel, where you can react and provide information just on time

Combination of internet banners, FB ads leading to Directorate web page, FB page for promoting the Directorate activities but also as channel for on time



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reaction on public questions and issues and PR texts on the most influential web portals is very useful way for reaching the wider public.

Facebook fan page

Facebook fan page is a great opportunity for younger target groups as well as for wider audience to have an interactive place where they can read updates or ask questions. A detailed plan should be made regarding the content that will be posted, how it will be handled. Fans can be informed on different topics regarding data protection and violation, ongoing activities or promotions that the Directorate will make

Online banners

Since most of our targeted population is active online, it is very convenient to create digital communication, online banners can be created that would link to the Directorates web page or to the facebook fan page. Banners should be interesting but on the other hand should be informational and educational. Additionally an online teaser can be made so that we can attract more audience that will be driven to the Directorates web page or FB fan page where they can get more information

Web page

Although the Directorate has a web page already, a new fresh look should be considered. The web page should be more users friendly and to have more practical news that will help people to resolve their questions. Questions and Answers list should be made where people can easily find a solution to their problem or there should be a form they can fill in asking their questions.



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PR Techniques

Various PR techniques should be used in order to create awareness among the Media, not only for the Directorate itself but also for its ongoing activities. They will help to create positive attitude and obtain involvement in the process and interest for the topics. The independent, third-party support is very valuable tool in informing, educating and promoting topics related to data protection topics.

Working with the journalist, imply following certain PR techniques in order to maximize their potential in fulfilling communication objectives

1. Identification of the journalists that are covering this area

Firstly, identification of the journalist in all media that are covering these topics should be made. After creating the list of these journalists, the Directorate should build up and maintain excellent relations. This identification of journalist will also make an easier approach when the Directorate would like to provide them fresh information, detailed explanations on different topics from the field of data protection.

2. Briefs and meetings with journalist

After having the list of journalist, briefs and meeting with journalists can be done. Having these briefings and meetings, will keep the journalists better informed thus they can provide to the audience exact, credible and relevant information about the topics but also will create better bonding between the journalists and the Directorate. On one hand the journalists would feel that they are informed and consulted about these topics and on the other hand the Directorate would have loyal and relevant journalists that will spread the information in proper way.



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The focus of the briefings should be on additionally proper education for data protection of the journalists, discussions for different situations where abuse of data has been made in order to have clear and right information that they can convey to the audience.

During these meeting press kits should be provided for them with clear explanation of the topics that should be discussed or they should transmit to the audience.

3. Interviews

Interviews in relevant programs or news should be given. General audience are not always aware if they give their personal data unnecessary, or if their personal data have been abused. So with these interviews general audience can be informed about the relevant topics

4. Ready to read information

In order to provide timely, practical and easily understood advice to journalist, individuals or organizations, some brochures or press kits for journalists should be made.

At the beginning they should be printed so that the distribution can be easily made and more people will be aware for the right for data protection, the competences of the Directorate or how people can proceed when their data have been abused. Additionally these brochures can be downloaded from the web site of the Directorate.

The main purpose of these leaflets/brochures it will be to strongly encourage the general public to turn itself to the Directorate and to take advantage of their fundamental right of data privacy.

These brochures can also contain which organizations are collecting their personal data and for what purpose, so that when people are asked for more personal data then needed, they could react properly.



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5. Events, BTL activities and Workshops

Events

Creating open events on some important dates for the Directorate such as 28th of January, the European day for personal data protection, 22nd of June – Creation of the Macedonian Directorate, etc, is a opportunity where the Directorate and its employees can have contact with the common people, journalists or employees from banks, hospitals, Police, Universities, etc. and can share some advices on how they should proceed when their data has been abused.

BTL activities

During the summer period, there is increased frequency of people especially in the tourist towns. Informational brochures can given out by promoters on several locations, such as beaches in Ohrid and Dojran, or on the streets in all other towns in Macedonia. It will be very convenient to have promotions near all institutions that might abuse the personal data such as banks, hospitals, mobile operator shops, etc. Promoters should be very well informed so that they explain to people the mission of the Directorate as well as the importance of protecting their personal data.

Work shops

Creating specialized workshops for different professions that are in everyday contact with personal data such as police officers, bank officers, doctors, mobile operators, etc. where they can gain special knowledge that will help them in their job.

Additionally, workshops can be made in schools where the youngsters can be educated on how to protect their personal data and how to proceed when the



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data have been abused. For this target group more focused communication can be developed regarding facebook or any online data abuse.

Influential individuals or groups

The importance of influential groups

High-level decision-makers and opinion leaders are very important when building the awareness of personal data protection. Creating support and positive attitudes from the influential groups toward the Directorate and its goals that has to be achieved, is crucial the process of increasing the awareness.

1. Identification of the influential groups or individuals

The support from influential groups is essential for providing wider understanding of the topics of personal data protection.

2. Meeting with influential groups

After the identification of the influential groups or individuals, they should be approached so that the importance of the Right for personal data protection can be presented. All meetings should be relevant to the field that these groups are working in. These groups are very important part of the connection between the Directorate and the wider audience.



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Contacting these groups will bring double benefits on the way of increasing the awareness, the first one in their groups, and the second one their influence will touch the wider audience.

Meetings with the Influential Groups are also good PR material that could be used as a further motivation for the media representatives to cover the topic.

3. Identifying opinion leaders

Every society has people whose opinions are detected as credible, important and respected. These leaders are very important in the process of creating and building the awareness. Their identification will help to easily reach the wider audience that these leaders are meeting on every day basis. These people may include the representative of local government, successful business people, professionals, professors etc. Such people should be identified and included in project activities such as meetings and workshops, but also in the interviews, public debate etc.

- Academic community- Selected law professors from the Universities should be approached. These professors are relevant for the Rights for personal data protection and are in every day contact with the students who are very important target group
- Government representatives- Ministers should be approached to awaken the consciousness of data protection issues in their offices, especially Minister for Interior, Health, Labor and Social policy, etc
- Doctors – Data protection in the health sector is very sensitive and important thing. Therefore doctors should be approached very intensely in order to raise awareness concerning data protection and the consequences of violation.



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- Mayors - Mayors are responsible for the entire local affairs. They are therefore a main target group for the awareness campaign.
- Influential individuals from digital society

Summary

The moderate/low level of awareness of the public for the private data protection, on one side, and the fast technology development, that creates opportunities for violation of data privacy on the other raise the importance of the education and information for the data protection topics and issues, The Good Communication and Awareness strategy can contribute significantly to the successful public education, promotion of the Directorate role and responsibilities and improve the situation regarding the private data protection in the country.

The communication strategy should be based on the following key elements:

- Constant communication message throughout all channels, as well as recognizable visual identity
- Usage of variety of communication channels that will correspond to the target audience and the certain objectives
- Diverse activities should be taken regarding the target audience in order to sensitize them in proper way
- Continuing communication and awareness raising activities



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- Monitoring and evaluation should follow the activities

Having in mind the current situation with the level of awareness among wide public, as well as the level of interest and involvement of the influential public and journalist, the following communication objectives were set :

- Inform and educate citizens on their right for personal data protection, but also educate about personal data in general
- Promote understanding and raise the level of awareness on the rights as well as the obligations of the society in the field of data protection
- Inform and educate about the procedures in case of privacy violation.
- Inform and educate about the role of the Directorate for the Right for personal data protection and its competences, operations and missions
- Create positive attitude, trust and image towards the Directorate as a mediator when privacy and personal data have been abused
- To maximize levels of awareness and compliance with data protection obligations among those keeping personal data.

The target audience can be segmented in two wider groups based on their needs and involvement in the process of increasing the awareness for the Right for personal data protection:

- Primary target group - General public which is more concerned with the issues of data protection and will be directly influenced by the communication



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- Secondary target group - which indirectly make influence to the communication

Having in mind the specifics of the target groups, as well as the specific objectives for each groups, and the potential and limitation of each communication channel, a set of communication tools should be used in order to have successful communication strategy.

With the activities planned within the communication strategy, and focused on the wide public and influential groups the following results can be expected:

- Higher awareness for the private data protection
- Deeper understanding of the topic
- Understanding of the procedures for data protection
- Understanding and positive attitudes toward Directorate for Data protection.



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