

Pursuant to Article 40, paragraph 1, line 14 and Article 41-a from the Law on Personal Data Protection (“Official Gazette of the Republic of Macedonia” No. 7/05, 103/08, 124/10, 135/11 and 43/14), the director of the Directorate for Personal Data Protection brought the

ANNUAL PROGRAM
FOR TRAININGS OF DATA CONTROLLERS AND PROCESSORS FOR THE
YEAR 2015

I. INTRODUCTION

The Directorate for Personal Data Protection (in the further text: the Directorate) apart from its supervising function on the lawfulness in the processing of the data, has a preventive role with promotion of the right to protection of the data through increase of the public awareness with implementation of trainings of the controllers and the processors in the Republic of Macedonia.

In terms of successful implementation of the legislation on data protection and the bylaws by the data controllers and processors, the Directorate has prepared this Annual program for the year 2015, which incorporates the key sectors. The Catalogue of trainings for data protection for the year 2015 and the other acts and programs related to the implementation of the trainings are an integral part of this Annual program.

Additionally, in the frames of the program orientation for increased education of the data controllers and processors, the Directorate will also implement tailor made trainings, in accordance with the requirements of specific data controllers and processors.

II. OBJECTIVES

With the implementation of this Annual program, the following objectives will be realised:

- Application of the regulations on personal data protection by the data controllers and processors;
- Improvements of the conditions with keeping a record of the Personal Data Collections in the Central Register of personal data collections (in the further text: Central Register) as well as its updating;

- More efficient compliance of the work tasks and improvement of the skills of the officer for personal data protection and the other authorised personnel from the data controllers and processors;
- More efficient and more effective usage of the technical and organisational measures for confidentiality assurance and protection of the personal data processing;
- Providing a higher level of protection of the personal data of the physical persons and
- Raising the public awareness for the personal data protection.

III. ANALYSIS OF THE NEED OF TRAININGS

Considering the responsibility to implement trainings for the interested data controllers and processors, the Directorate, based on the results of the inspections in the year 2014, made an assessment which trainings and fields are a priority according to the analysis of the conditions in relation to:

*The term tailor made trainings according to the needs of a specific data controller/processor signifies that the trainings are specifically structured according to the needs and requests of the data controller/processor.

- the registered number of data controllers and Personal Data Collections in the Central Register;
- violations determined by the conducted inspection by areas;
- the changes in the laws and by-laws related to the personal data protection and in the separate specific areas of the legislative on the sector;
- implementation of the technical and organizational measures for confidentiality assurance and protection in the processing of the personal data and
- the way of implementation of a video surveillance system.

IV. TYPES OF TRAININGS AND PRIORITY AREAS

In order to satisfy the needs for trainings of the data controllers and processors, as well as rising the level of protection of the personal data, the Directorate has provided the circumstances for realisation of the following trainings in the year 2015:

1. Generic/ Basic trainings
2. Specialised trainings
3. Tailor made trainings (according to the specific program requested by the controllers/ processors)
4. Special trainings for the authorised bodies for audit of the personal data protection

- ***GENERIC/BASIC TRAININGS – by modules***

The generic trainings are trainings which enable the participants to gain general/basic knowledge (basic level) in the field of personal data protection and enable the process of gaining the basic skills and knowledge for the principles and values of the personal data protection.

Module 1: Legal grounds (the Law on Personal data Protection and the by-laws on the personal data protection) in the Republic of Macedonia and the Law of the EU;

Module 2: Responsibilities of the data controller and the processor;

Module 3: Register of Personal Data Collections and officer for personal data protection.

Usually, the generic trainings are conducted before the implementation of each of the specialised trainings.

- ***SPECIALISED TRAININGS – by modules***

The specialised trainings are trainings in which specific themes are elaborated, according to the field from which the participants come from, with the sole purpose of improvement of their specific knowledge and skills in the compliance of the tasks connected to the personal data protection. Additionally, these modules of training elaborate the material regulations from the aspect of application of the regulations on personal data protection.

Module 1 – Education;

Module 2 - Healthcare;

Module 3 - Media;

Module 4 – Finance, banking, investment funds and brokerage firms;

Module 5 – Labour relations, employment, employment intermediation, safety and health at work;

Module 6 - Telecommunications;

Module 7 - Pension funds;

Module 8 - Administration;

Module 9 – Social care;

Module 10 – Economy;

Module 11 - Judiciary;

Module 12 - Insurance;

Module 13 – Private security;

Module 14 – Tourism and hospitality;

Module 15 – Local self-government;

Module 16 – Trade;

Module 17 – Accounting/ Bookkeeping bureaus;

Module 18 - Cloud computing

Module 19 - Privacy accountability

Module 20 – Privacy Impact Assessment (PIA)

Module 21 – Privacy by Design and Privacy by Default

Special module 1: Technical and organizational measures in confidentiality assurance and protection of the processing of the personal data (in general, as well as specifically according to the area);

Special module 2: Video surveillance;

Special module 3: Biometric data;

Special module 4: Transfer of personal data in other countries and

Special module 5: Processing of special categories of personal data.

The specialised trainings are conducted if there are at least 10 (ten) participants for the module. The maximum number of participants is 20 (twenty) participants. If there are more than 20 participants for a specific module, the Directorate will organize another training with the same modules once there are 10 (ten) registered participants for the training.

- **TAILOR MADE TRAININGS ACCORDING TO THE NEEDS OF THE CONTROLLERS/PROCESSORS**

The term tailor made trainings according to the needs of the data controller/processor signifies that the trainings are made in accordance with the specific requests and needs of the data controller/processor. These trainings elaborate specific more complex questions from the area of personal data protection.

The tailor made trainings are conducted for one or more data controllers or processors in accordance with the requested specific program. The number of the participants in these trainings is subject of agreement between the controller/ processor and the Directorate. .

- **SPECIAL TRAININGS FOR THE AUTHORISED BODIES FOR AUDIT OF THE PERSONAL DATA PROTECTION**

These specific trainings are conducted in accordance with a specific program by the legal entities which have the authorisation to conduct audit on the protection of personal data, according to the Guideline on the manner of performing the external audit No. 02-904/1 from 18.5.2012, and No. 02-908/1 form 19.4.2013. The number of the participants at the specific

training is a subject of agreement between the legal entity – the authorised body and the Directorate.

V. TRAINING COSTS

According to the provisions of the Article 41 of the Law on Personal Data Protection, the costs of the trainings defined with this annual agenda are covered by the data controllers and processors, i.e. to the authorised bodies, with the exception of the budget users.

The amount of costs of the trainings are defined with the Resolution for determination of the amount of costs of training implementation for interested controllers and processors No. 02-1396/1 from 8.11.2010, published on the website of the Directorate: www.privacy.mk .

V. TRAINING REGISTRATION

The training registration is made in accordance with the provisions on the Guidelines on the organisation and implementation of trainings for controllers and processors, published on the website of the Directorate: www.privacy.mk

VI. FINAL PROVISION

This Annual agenda will be published on the website of the Directorate for Personal Data Protection (www.privacy.mk), and will be relevant starting from 1st of January, 2015.

Director,

Dimitar Gjeorgievski