



REPUBLIC OF MACEDONIA

for the work of

Directorate for Personal Data Protection



ANNUAL REPORT

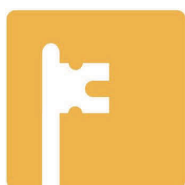
2010



Directorate for
Personal Data
Protection



Republic of Macedonia



Directorate for
Personal Data
Protection



ANNUAL REPORT

FOR THE WORK OF THE DIRECTORATE FOR PERSONAL
DATA PROTECTION IN 2010



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Dimitar Gjeorgjievski, Director

Directorate for personal data protection in 2010 has successfully realized planned activities and focused on initiation of new processes which ensure improvement in the field of personal data protection in the Republic of Macedonia.

In the reporting period, of a especially great interest was the adoption of the amendments and modifications of the Law on personal data protection ("Official Gazette of the Republic of Macedonia" number 124/10). This Law strengthened the role of the Directorate as the competent authority inspection over the processing of personal data and protection of privacy in general. The Law ensured tracing of new priorities and perspectives for future activities and efforts of the institution.

We have finished the year with completed legal framework, adopted rulebooks with which we implement the law. New organizational structure of the Directorate was made in order to increase the efficiency and effectiveness of the work. We have put accent to the inspection as primary function of the Directorate.

Nor less important, in European spirit, we take care of the preventive role of the Directorate. Raising public awareness and the feeling of existence and care of the right of privacy and personal data protection of the citizens and of the controllers, as well as increasing the efficiency in the implementation of the provisions and principles for personal data protection are one of the priorities of the work of the Directorate.

Efficiency in the given efforts for informing about and implementation of the regulations on personal data protection means further organization of the process of realization of trainings for personal data protection, which appeared to be the greatest and the best accepted and welcomed change among the controllers. This can be supported by the number of the interested controllers for participation in the trainings that are running continuously.

Creating policies for further development of the Directorate for personal data protection in 2010 will be our base for the work in 2011. We expect increased workload, successful implementation of the laws, stronger visual identity of the Directorate, recognizable right of personal data protection.

I am sure that in the year ahead we will continue with the successful fulfilling of our priorities and handling with the challenges that follow in the field of protection of privacy.

“Every man should know that his conversations, his correspondence, and his personal life are private.” Lyndon B. Johnson

Sincerely,

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Mission of the Directorate for Personal Data Protection (hereinafter: Directorate) is to ensure transparency and information to the citizens for the right of personal data protection and absolute protection of this right from any kind of violation during the collection, processing and keeping the personal data of the citizens from unauthorized changes, destruction and transfer of personal data, which is being determined through inspection investigations over the legality of the personal data processing, as it is prescribed in the Law on personal data protection.

The Directorate is responsible for:

- creation of the normative policy for implementation of the regulations for personal data protection;
- respecting the principles for personal data protection;
- issuing opinions on the sub legal acts of the controller and processor and providing help in the processing of personal data;
- performing inspections over the legality of personal data processing;
- evaluation of the legality of personal data processing;
- acting upon the requests from citizens for breach of their personal rights as regards personal data processing;
- operating the Central Register;
- keeping evidence for the transfer of personal data in other countries;
- realizing international cooperation in the field of personal data protection and participates in the work of international organizations and institutions dealing with personal data protection.

Apart from those basic competencies, the Directorate is striving to realize its strategic activities:

- Promotion of the „culture of personal data protection” to the controllers and processors and the general public as well, and
- Continuous improvement of the quality of the policies and recommendations for personal data protection, whenever it is a condition for successful realization of the goals for personal data protection as fundamental freedoms and rights of the citizens.

1.1 Achievements in 2010

In 2010, the Directorate realized its main planned activities and priorities for the reporting period which were focused at continuing of the actual activities and starting with new processes which will ensure the planned development in the area of personal data protection for longer period ahead.

- Active participation of the Directorate in the process of building consistent legal system from the aspect of consequent implementation of the principles for personal data protection;
- Harmonization of the legal regulations for personal data protection through amendments and modifications on the Law on personal data protection and other regulations in several areas aiming to fully harmonize with the Directive 95/46 EC;
- Active contribution of the Directorate through involvement in projects, working parties and bodies in order to reach harmonization of the sector oriented regulations with the principles for personal data protection;
- Further implementation of the regulations for personal data protection by the controllers and processors;
- More intensive evidence of personal data collections maintained on the territory of the Republic of Macedonia, in the Central register of personal data collections;
- Initiation of the process for appointment of responsible person—Data protection officer by the controller and training of the data protection officers provided in the Directorate, as it is prescribed in the amendment and modifications of the Law on personal data protection from 2010;
- Adoption and implementation of annual programs for organization of trainings for the controllers and processors of personal data collections, as well as for the Directorate's staff;
- Raising public awareness of the citizens for the right on personal data protection and the legal instruments they can use when violation of this right occurs;
- Raising public awareness of the citizens for usage of personal data on the internet, especially when using social networks services;
- Maintaining the continuity in international cooperation by active participation in the work of the organs and bodies of the European union, Council of Europe and other international networks that work in the filed of personal data protection, which is determined by the limited financial resources;

- Strengthening the cooperation with the state institutions and the private sector through providing opinions and reprimands for the alignment of the draft laws and draft sub legal acts with the regulations for personal data protection;
- Continuous performance of inspection over the implementation of the Law on personal data protection and the regulations adopted on the basis of the Laws in the private and public sector;

At the beginning of 2010, working group for creation of the Draft Law on amending and modifying the law on personal data protection was formed and started its activities by making analyses of the European legislation and its harmonization with the Law on personal data protection. In this working group and in the frames of the TAIEX expert mission for amendments and modification of the Law on personal data protection (JNA IND/EXP 41346), an international expert was engaged, Mr. Lukas Gunderman from the Center for personal data protection Schlesig-Hollschtein. After his analyses he came to the conclusion that the Law was in correlation with the legislation of the European union.

Aiming to strengthen the institutional framework for personal data protection in the Republic of Macedonia which will help in overcoming all the identified demerits, as well as ensuring higher level of legal protection of the citizens and decreasing the violations in the processing of personal data by the controllers and processors and raising public awareness of the citizens, the Directorate prepared Law on amending and modifying the Law on personal data protection.

For expeditiously and efficient implementation of the Law on amending and modifying the Law on personal data protection and in light of more efficient performance of the legal competencies, at the end of 2010 the organizational structure of the Directorate was changed.

Namely, the new Rulebook on internal organization of the Directorate for personal data protection, number 01-1600/1 from 10 December 2010 established the new organizational structure with the following departments and units:

1. **Department for inspection — west** - consisted of two Units for inspection over the public and private sector;
2. **Department for inspection — east** - consisted of two Units for inspection over the public and private sector;
3. **Department for legal affairs and international cooperation** - consisted of three Units;
4. **Department for Central register, IT support, planning, analyses and statistics** - consisted of two Units and
5. **Unit for human resources which is an independent Unit.**

As an efficient tool for raising public awareness for the right on personal data protection, the Directorate in the course of 2010 organized trainings for the controllers and processors of personal data. Based on article 40, paragraph 1, line 14 and article 41 of the Law on personal data protection, the Director of the Directorate in light of implementation of the provisions of the Law on amendments and modifications of the Law on personal data protection („Official Gazette of the Republic of Macedonia number 124/10) adopted Annual Program for training of controllers of personal data collections and processors for 2010, number 02-1300/1 from 27.10.2010.

The Director of the Directorate also adopted an Annual Program for training of controllers of personal data collections and processors for 2011, number 02-1304/1 from 27.10.2010.

The Instruction for the manner of organization and realization of training of controllers and processors, number 02-1414/1 from 11.11.2010, describes in details the manner of organization and realization of training of interested controllers and processors of personal data collections. Beside this, Decision for defining the costs for delivering trainings to the interested controllers and processors, number 02-1396/1 from 08.11.2010, defines the real costs of the Directorate for delivering trainings for interested controllers and processors of personal data collections, depending on the type of training and modules for which they are interested, in accordance with the Annual Program for training of controllers of personal data collections and processors.

1.2. Perspectives for 2011

Planned activities and priorities for 2011 are:

- Further and continuous raising of the public awareness for the existence and protection of the right of privacy and personal data protection of the citizens and of the controllers and processors;
- Raising the efficiency in implementation of the provisions and principles for personal data protection in the frames of corporative governance of the controllers and processors;
- Strengthening of the inspection in all segments of social acting;
- Organization of the process of delivering trainings for personal data protection according the implementation of the Annual Program for 2011 and the additional requests for training of the controllers and processors of personal data collections in 2011;
- Redesign of the content of the Central register of the personal data collections according the new amendments and modifications of the Law on personal data protection and its usage for the needs of the inspection departments;
- New branding of the Directorate and redesign of the Directorate's web page;
- Survey and analyses of the public opinion for the right for personal data protection;
- Organizing open days for the citizens and other activities which support the process of raising public awareness for personal data protection;
- Proposal for defining an obligation for all state institutions that create legislation for obligatory receiving an opinion from the Directorate when adopting regulation containing provisions for personal data protection.;
- Preparation of analyses on the state of affairs in personal data protection with proposed measures for improvement in specific areas;
- Further development of the international cooperation and active participation in the work of the institutions and bodies of the European union, Council of Europe and other international networks that work in the field of personal data protection;
- Creation and adoption of Strategy for development of the personal data protection in the Republic of Macedonia for the period 2011—2015 with action plans and implementing programs;
- Implementation of the IPA 2008, Component 1, project "Support to the Directorate for personal data protection" is aimed to contribute to strengthening of the Directorate's competencies, improving the implementation of the legislation for personal data protection as well as raising public awareness of the citizens for their right of personal data protection. In the frames of the project "Support to the Directorate for personal data protection" it is anticipated that harmonization of the national legislation with the European legislation will be made, institutional capacities of the Directorate will be strengthened, public



1. ACHIEVEMENTS AND PERSPECTIVES

awareness for the right of personal data protection will be raised and the IT structure of the Directorate will be upgraded.

2.1 Novelettes of the Law on Personal Data Protection

Law on amending and modifying the Law on personal data protection (“Official Gazette of the Republic of Macedonia” 124/10) entered into force on 29. 09.2010.

With the novelettes of the Law, following amendments and modifications were done:

- Strengthening of the procedures handled by the Directorate, in direction that Directorate is granted free access to data from official registers, publicly available collections of data or other collections kept by state institutions, public institutions, utilities and other legal entities that maintain official registers or other personal data collections free of charge in order to have efficient performance of its competencies. The Directorate will be able to oblige the controllers and processors to undertake some action in cases when resistance is expected;
- Specifying the procedure for inspection over the processing of personal data (aim is to ensure higher level of control over the controllers and processors in the public and private sector), and the status of the inspectors for personal data protection is legally defined;
- Specifying the procedure for processing personal data in court decisions;
- Specifying the procedure for determination the violation of the right of personal data protection. Namely, the procedure is being conducted in accordance with the provisions of the Title IX-and for inspection. The request for determination of the violation of the right of personal data protection can be submitted versus controllers or processors is submitted to the inspection departments. In the same time, the procedure is performed by the inspectors from the Directorate through inspections which contributes for more efficient execution;
- Creating obligation for the controllers for appointment of Officer for personal data protection;
- Specifying the provisions for the manner of video surveillance;
- Specifying the procedure for issuing an approval for processing of the special categories of personal data and transfer of personal data to other countries;
- Harmonization with the provisions of the Law on electronic management (“Official Gazette of the Republic of Macedonia” 105/09), by giving personal data to users can be submitted electronically;
- Specifying the misdemeanour procedure performed by the Directorate and decreasing the misdemeanour sanctions;

With those amendments and modifications the following was achieved:

- Harmonization of the legislation and enforcement of the laws as well as adapting the laws of the Republic of Macedonia to the law of the European union.;
- Harmonization of the Law on personal data protection with the national



- legislation of the Republic of Macedonia and
- Establishing more efficient protection of the right of personal data protection (legislation, institutional framework).

2.2. Secondary legislation

On the basis of the Law on amending and modifying the Law on personal data protection proper amendments and modifications were made in the secondary legislation adopted pursuant to the provisions of this Law.

In that direction, the following amendments in the sub legal acts of the Directorate were done:

1. Rulebook on amending and modifying the Rulebook on technical and organizational measures for secrecy and protection of the processing of personal data („Official Gazette of the Republic of Macedonia 158/10);
2. Rulebook on amending the Rulebook on the Form, the form and content of the identity card, as well as the manner of its issuance and withdrawal (“Official Gazette of the Republic of Macedonia” no.158/10);
3. Rulebook on amending the Rulebook on the form and content of the notification form for processing of personal data and how to inform the central registry of personal data collections (“Official Gazette of the Republic of Macedonia” no.158/10) adopted in 2010;

At the same time, the following new Rulebooks were adopted:

1. Rulebook on the content and form of the act for the manner of performing video surveillance (“Official Gazette of the Republic of Macedonia” no.158/10)
2. Rulebook on the form and content of the form for record of performed personal data transfer to third countries and for the manner of keeping records (“Official Gazette of the Republic of Macedonia” no.158/10);
3. Rulebook for the manner of performing inspection supervision (“Official Gazette of the Republic of Macedonia” no.158/10);
4. Rulebook of the form and the content of the invitation for the purpose of education, as well as the manner of implementation of the education (“Official Gazette of the Republic of Macedonia” no.158/10).

2.3 Implementation

- **Provided expert opinions**

The Directorate continuously provides expert opinions for the issues connected to the processing of personal data, as one of the fundamental freedoms and rights of the citizens. Most of the expert opinions are connected to laws, sub legal acts and international agreements, documentation for technical and organizational measures for secrecy and protection of processing of personal data by the controllers and questions from natural persons connected to the misuse of their personal data.

Provided expert opinions by areas (January 2010 - December 2010)

Area/institution	Number of expert opinions
Insurance	5
Civil associations	2
Automobile importers	1
Transport	1
Pension funds	12
Perpetrators	1
Banks	25
Telecommunications	9
Health	18
Advocates offices	8
State institutions	80
Natural persons	93
International	10
Finance	18
Consultations by phone	403
Judiciary	5
Public enterprises	7
Foundations	1
Chamber of commerce	1
Media	1
International organizations	1
Non governmental organizations	7
Education	14
Legal entities	36
Social work	1
Political parties	1
Tourism	1
Human rights	1
Energetic	2
Stock companies	2
Total	767

Opinions on laws, sub legal acts and international agreements

Agreement between the Government of the Republic of Macedonia and Republic of India for combat international terrorism, crime and illegal drug traffic
Agreement between the Government of the Republic of Monte Negro and the Government of the Republic of Macedonia for readmission of person without permit for stay
Agreement between the Government of the Republic of Macedonia and the Government of the Republic of Turkey for presiding people how reside without permission
Agreement for police cooperation between the Government of the Republic of Macedonia and the Government of Belgium
Agreement between Government of the Republic of Macedonia and the Government of the Republic of Serbia for presiding persons with illegal entry and stay
Agreement between Republic of Macedonia and Iceland for presiding persons with illegal stay
Draft Agreement of the member states of the regional initiative for migration, asylum and refugees—MARRI for exchange of data of the persons requesting asylum
Draft Protocol for cooperation between the National Directorate for anticorruption within Public Prosecutors Office, General Directorate for anticorruption within Ministry of administration and interior of Romania
Draft Law on amending and modifying the law on weapons
Draft Law on amending and modifying the Law on electronic communication
Draft Law on amending and modifying the Law on combat money laundering and financing terrorism
Draft Law on amending and modifying the Law on industrial property
Draft Law on electronic management

Laws, sub legal acts and international agreements upon which the Directorate issued opinions

Draft Law on border control
Draft Law on amending and modifying the Law on one step system and maintaining trade register and the register of other legal entities
Draft Law on national intelligence data base
Rulebook on amending and modifying the Rulebook on content and manner of keeping police evidences and form and content of the form for police evidence
Rulebook for the manner of examination and evaluation of the results of students on the exams for state graduation in secondary, vocationally and secondary art education
Rulebook on the content of the Request for obtaining authorization for giving previous legal aid
Rulebook on the content of the form for the expenses for the scope of the executed work by the authorized associations.
Rulebook on the form and content of the template for the Request for entry in the Register for lawyers for legal aid
Rulebook on the content of the template for the Request for free legal aid
Rulebook for the modification and amendments of the Rulebook for the standards for housing in residential buildings
Rulebook for the form and content of the numbered register which is kept by the subjects how offer games of luck in casinos
Rulebook for the technical requirements for obtaining access to administrative services electronically and policy for the access provider for the use graphic and other portals of the information system
Rulebook for the standards and the rules for security of the information systems which are used by the state bodies for electronic communication

Rulebook for the form and content of the basic elements of the Request for providing administrative services electronically and for the format of the document in electronic form
Rulebook for the recognition of the unique environment and communication between the state bodies electronically through the unique environment for exchange of documents and data
Rulebook for the manner for certification of the information systems which are used by the communication bodies electronically, as well s for the form and content of the certificate for the functionality of the information systems
Rulebook for the standards and rules for the unified nomenclature in the electronic intercommunication
Rulebook for the form and the content of the records of the data bases of the bodies who electrically intercommunicate, the way of keeping the records, the form and the content of the template for notification for establishing the data base, her update and keeping, as well as for the changes which reflects her status, ways of notification, ways of use, recording, access and keeping the records of the data bases of the administrative services made electronically
Rulebook for the criteria relating to the space conditions, objects, material-technical equipment and professional staff of the authorized professional technical services and the legal entities for decontamination and for the form and content of the Request for obtaining license and form an content of the license
Rulebook for the manner and dead lines for examination of the sources for ionizing emission, measuring the exposure of the patients during diagnostic and therapeutic procedures , keeping records and submitting reports

Source: Archives of the Directorate for personal data protection

- **Issuing approvals for transfer of personal data to third countries and for processing sensitive categories of personal data**

Transfer of personal data: Law on personal data protection contains separate provisions for transfer of personal data to third countries. Transfer of personal data is possible when the Directorate gives prior approval and when suitable measures for personal data protection and protection of the privacy of the data subject.

Special categories of personal data: Provisions of the Law on personal data protection envisage additional precondition for processing of special categories of personal data. Data controller is obliged to ask for approval from the Directorate prior to start of the processing of the unique register number of the citizens, data on the racial and ethnic origin, biometrical data and genetic data, except when the controller is obliged to process this data in accordance with law.

The Directorate has issued two negative opinions connected to processing of biometric data for the purposes of controlling the working time of the employees in state institutions.

Approvals for transfer of personal data and for processing sensitive categories of personal data (January 2010 - December 2010)

Source: Archives of the Directorate for personal data protection

Area	Number of requests	Processed	Refused	Termination of the procedure	Pending
Biometric data	4	3	/	1	/
Unique register number	3	3	/	/	/
Transfer of personal data to third countries	3	3	/	/	/
Total	10	9	/	1	/

- **Issued reprimands by areas**

The Directorate issued 43 reprimands for efficient implementation of the provisions and principles for personal data protection by the controllers and processors. Most of the reprimands were issued to the state institutions (Ministry of interior, Ministry of health, Ministry of transport and communications), telecommunication operators, banks, and the reason was that personal data were excessive in relation to the purposes for which they are collected and processed and were not in accordance with the regulations for personal data protection.

Issued reprimands by areas (January 2010 - December 2010)

Source: Archives of the Directorate for personal data protection

Area	Number of reprimands
Internet	2
Health	4
State institutions	5
Natural persons	3
Education	1
Trade, utilities	9
Media	2
Finance	1
Tourism	2
Judiciary	1
Banking	3
Advocate offices	1
Telecommunications	7
Public utilities	1
Civil associations	1
Total	43

- **Requests form citizens for determination of violation of the right of personal data protection pursuant to article 18 from the Law on personal data protection**

The Directorate acted upon requests for determination of violation of the right on personal data protection submitted by natural person. The procedure for exercising this right pursuant to article 18 from this law terminates with Decision brought by the Director of the Directorate and An administrative dispute may me initiated against the decision of the Director within 15 days of the receipt of the decision.

Pursuant to the last amendments and modifications of the Law on personal data protection published in the Official Gazette of the Republic of Macedonia number 124/10, for violation of the right of personal data protection, the inspector for personal data protection carries out inspection procedure and decides by bringing a decision, in accordance with provisions from part IX-a – inspection.

Submitted Requests for determining violation of the right for personal data protection

Area	Number of requests	Determined violations	Rejected	Panding
Telecommunications	1	1		
Local self-government	3	2	1	0
Judiciary	1		1	
Private sector	4	4		0
Natural persons	4	2	2	0
Insurance	1		1	
Media	1	1		
Ministry of interior	16		10	6
Education	2	2		
Non governmental organizations	1		1	
Total	34	12	16	6

- **Violations of the right of personal data protection on the internet**

One of the areas in which the Directorate received most requests is the violations of the right of personal data protection on the internet. Requests from citizens for this type of violations were the following:

- Creation of fake profiles on the social network site Facebook- 153
- Violation of passwords on profiles or e-mail accounts - 2
- Uploading video materials without consent of the data subject - 3

The Directorate sent requests for deletion of fake profiles, photographs published without consent or other content in question directly to the web pages or services registered in other countries.

3.1 Development and strengthening

In 2010, the Directorate paid special attention to implementation of the provisions of the Law on personal data protection in the part of carrying out inspections over the legality of the undertaken activities for processing personal data, as one of the main competencies of the Directorate.

In direction of strengthening of this main competence of the Directorate, organizational structure was changed and two departments for inspections were created, Department for inspection — west and Department for inspection — east.

With the new amendments and modifications of the law, short and precise deadlines for the inspection procedure were defined. Persons authorized for carrying out inspection have gained the status of inspectors for personal data protection and for the determined violations they bring decisions which can be subject of an administrative dispute at the Administrative court upon request of the controller or processor.

Rulebook for the manner of performing inspection¹ adopted by the Director of the Directorate, prescribes in details the procedure for performing inspection to controllers and processors, according to the Annual program and monthly plans of the Directorate and the Departments.

Aiming to provide easier way for exercising the right of privacy to the natural and legal persons, on its web page the Directorate² published the Initiative for performing inspection. Beside this, on its web page Directorate also published the Check list for inspections for the controllers as well as the guidance for filling the form.

Pursuant to the Law for amending and modifying the Law on personal data protection and the Rulebook of the form and the content of the invitation for the purpose of education, as well as the manner of implementation of the education, inspection Departments started with delivering educations for the controllers. The Rulebook prescribes in details the form and the content of the invitation for the purpose of education, manner of implementation of the education, as well as the manner of keeping evidence for the delivered educations.

¹ „Official Gazette of the Republic of Macedonia“ 158/10

² www.dzlp.mk

3.2 Activities

In 2010, Departments for inspection performed 117 inspections out of which, 44 regular inspections, 56 incidental inspections and 17 control inspections (picture 1)³. Procedures for 24 inspections which started in 2009, finished in 2010 (picture 2)⁴. Greater part of the incidental inspections are performed in the private sector. With the performed inspections controllers from public and private sector were covered but also natural persons were included. In the private sector, 53 controllers were covered, in the public sector 58 controllers were covered and 6 natural persons were inspected (picture 3)⁵.

In the course of 2010, 86 minutes from the performed inspections were created (6 for inspections finished in 2009 and 80 for inspections initiated in 2010); 64 decisions (10 for inspections initiated in 2009 and 54 for inspections initiated in 2010); 15 minutes for settlement are issued with 127 payment orders after performed control and incidental inspection in 2010 and 11 requests for initiation of misdemeanor procedure were submitted to the Misdemeanor Commission of the Directorate. In 14 cases the propose for settlement was rejected.

Inspections were performed in state institutions, law enforcement institutions, units of the local self-government, insurance companies, natural and legal persons from different areas.

Areas of priority for performing inspection were: state institutions, education, commerce and fabrication, local self-government, natural persons and insurance.

Although the controllers cooperate with the Directorate during the inspection, most of them, especially controllers from public sector do not react upon the obligations deriving from the decisions. Because of this, the level of implementation of the provisions of the Rulebook on technical and organizational measures for secrecy and protection of processing of personal data of the controllers (especially from public sector) is low and the principles for personal data protection are not respected.

In 2010, citizens and legal persons sent complaints mostly for processing personal data by video surveillance, processing of personal data for the purposes of direct marketing without their consent, processing of personal data without legal grounds and without consent from the subject of personal data (citizen), identity theft, collecting the unique register number of the citizen without legal grounds and keeping copy of ID card at the entrance of premises of some controllers.

In 2010, the Directorate prohibited video surveillance out of the area which is sufficient to fulfill the purpose of its installing and enforced removal of one part of the system i.e. cameras that record premises of centers for treatment of addictions, as well as decreasing the number of cameras which record the corridors and waiting rooms in public health institutions. Directorate prohibited video surveillance out of the area which is sufficient to fulfill the purpose of its installing in education institutions, state institutions, commerce and common premises in buildings.

During the performance of inspections in 2010, controllers gave explanations that one of the purposes for installation of video surveillance systems is control over the efficiency of the work of the employees. Law on personal data protection does not

recognize the control over the efficiency of the work of the employees as legitimate purpose for installation of video surveillance system in the premises of the controller. Continuous video surveillance of the employees is not in accordance to the Constitutionally guaranteed rights for personal data protection and privacy protection. European regulation and practice shows that this is direct violation of the right of personal data protection and privacy and can not be used as an instrument for increasing the effectiveness of the work, for which the positive regulation envisages other methods, measures and activities.

In is noted that natural and legal persons often install video surveillance systems on public places (streets, parking lots, parks, pavements, squares) with the purpose of recording the cars of owners/employees or uploading the records on the internet for popularization of web pages. This type of video surveillance is not in accordance with the purposes stipulated in the Law on personal data protection. During 2010, one administrative dispute was submitted against decision from inspection, the procedure is still ongoing.

In the period from 21.10.2010 to 31.12.2010, in the Directorate, in the Department for inspection, 66 complaints were received. All of the complaints are in the field of personal data protection, 41 of them are submitted electronically and 25 in written. 49 complaints are submitted by natural persons, 5 by legal persons and 12 are anonymous. Directorate acted upon all 66 complaints.

³ Annex 1 page 52

⁴ Annex 1 page 52

⁵ Annex 1 page 52

4.1 Central register

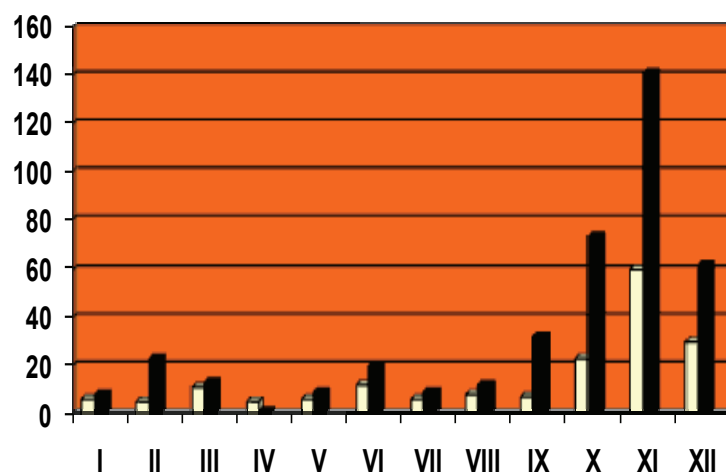
In 2010 controllers continued registering their personal data collections in the Central register of personal data collections (hereinafter: Central register). Central register had its own great influence in the transparent acting of the Directorate as an instrument for exercising the right of informing the citizens about the personal data collections of the controllers as well as in the process of submitting requests for deletion of personal data which are kept without legal basis. In the same time, the Central register gives solid ground for internal reviews and analyses of the state of affairs of the personal data collections in separate areas and possibility for directed acting. In the reporting period, 178 controllers and 404 personal data collections were registered in the in the Central register. From the establishment of the Central register until now, 301 controllers and 714 personal data collections were registered. Registration of the controllers is done in 36 organizational forms.

Pursuant to the amendments and modifications of the Law on personal data protection published in the “Official Gazette of the Republic of Macedonia” number 124/10, controllers have the obligation to appoint Data Protection Officer (Article 26.

In addition to this, in 2010, pursuant to the amendments and modifications of the Law on personal data protection, Director of the Directorate adopted Rulebook on amending the Rulebook on the form and content of the notification form for processing of personal data and how the inform the Central register of personal data collections aiming to simplify the registration process of the controllers and personal data collections, manner of approving controllers from the Directorate. Obligation for registering modifications in the Central register is prescribed with the form and content of the notification form.

In function of implementation of the new acts for Central register, Directorate started with continuous introduction of the controllers with the new obligation through sending notifications for fulfilling the obligation. In the first months from entering into force of the amendments and modifications of the Law, as a result from the undertaken activities with sending the notifications, 293 Data Protection Officers were registered. Central register continuously sends notifications to the controllers for personal data protection to inform them about the obligation for registering in the Central register and for appointing Data Protection Officer.

REVIEW OF REGISTERED CONTROLLERS AND PERSONAL DATA COLLECTIONS FOR 2010 BY MONTHS



4.2 Strategic planning and analyses of policies

Directorate moved forward to planning of its activities from 2007 when the first Strategic plan was adopted. Regularly, on annual basis revision of the Strategic plan is made, all the realized activities are noted and projections for the following two years are made. Planned, expected results in 2010 defined in the Strategic plan for 2010 are realized:

- Commentary on the Law on personal data protection;
- Commentary on the Rulebook for technical and organizational measures for secrecy and protection of processing of personal data;
- Draft Law on amending and modifying the Law on personal data protection;

In 2010, final version and adoption of the Strategy for personal data protection in the Republic of Macedonia 2011-2015 is planned. It is expected that this activity will be realized through IPA 2008, Component 1, Project—Support in drafting strategic documents and corresponding action plans, including media awareness research, for improved implementation of the personal data protection right.

4.3 Data Protection Officer

The amendments and modifications of the Law on personal data protection in 2010 for the first time introduced the term Data Protection Officer—person responsible for personal data protection. According to the law, Data Protection Officer is responsible for:

- involvement in the decision making process regarding the processing of personal data;
- following the harmonization of the Law with the acts enacted pursuant to the Law, internal acts for personal data protection and documentation for technical and organizational measures on personal data protection, to coordinate control over the actions prescribed in the internal acts for personal data protection and
- suggests trainings for the employees

Directorate has sent notifications for appointment of Data Protection Officers to 571 controllers of personal data collections:

- 85 local-self government (mail)
- 26 chambers;
- 50 faculties;
- 170 notaries;
- 78 perpetrator;
- 6 insurance companies
- 156 previously registered controllers

TABLE OVERVIEW OF THE APPOINTED DATA PROTECTION OFFICERS WHICH ARE REGISTERED IN THE CENTRAL REGISTRAR FOR DATA CONTROLLERS	
Organizational form	Number
Stock company	47
State institution	40
Limited liability company	31
Limited liability company established by one person	24
Units of local self-government	21
Health institution	10
Health organization	3
Citizens association	36
Public prosecutor office	3
Public utility	7
Public trade company	1
Person with public authorizations	2
International organization	1
Scientific institution	1
Educational institution	66
Educational-scientific institution	21
State administration body	9
Other chamber and association	5
Affiliation and representation office of international association	1
Commercial interesting community	2
Court	14
Public institution	11
Fond	2
Foundation	3
Total	361

One of the strategic attributions of the Directorate is the international cooperation and participation in the work of the bodies of the European union, Council of Europe and other international networks of the data protection authorities. Realization of the international cooperation is a key imperative for success of the Directorate because it presents a way for following the newest experiences and practice in the field of personal data protection.

5.1 Conferences and working parties

- **Article 29 Working party**

From April 2007, Directorate gained status of observer in the Article 29 Working party⁶ within the Directorate for justice, freedom and security of the European Commission. Although the Directorate started to attend the meetings held in Brussels, because of the lack of financial resources, was not able to attend the meetings of the Article 29 Working party in 2010.

- **Consultative Committee T-PD of the Council of Europe**

The Directorate, acting as a competent state authority for personal data protection in the Republic of Macedonia is member of the Consultative Committee (T-PD)⁷ of the Council of Europe.

In the period from 01 to 04 June 2011, representative of the Directorate attended Plenary meeting of the Committee which priority issue was preparation of Recommendations for protection of natural person when automatically processing personal data in the frames of profiling in private sector. Directorate presented report for celebration of the 28 January—European day on personal data protection.

- **Spring conference**

Representatives of the Directorate attended the Spring conference of the European data protection authorities held on 29—30 April 2010 in Prague, Czech Republic, which goal is to establish closer cooperation between the European data protection authorities. Main issues discussed on the Conference were the internet and monitoring in time and space, children as internet users, critical point of personal data protection, participation and contribution of the public sector as privileged processor of personal data and ethnic profiling.

⁶ Working party for personal data protection in the frames of the General directorate for justice, freedom and security of the European commission which is formed on the basis of article 29 of the Directive 95/46/EC of the European Parliament and the Council from 24 October 1995 for the protection of individuals regarding automatic processing of personal data.

⁷ Consultative Committee (T-PD) is a professional body for data protection in the framework of the Council of Europe in which members are the representatives from the national supervisory bodies which are members of the Council of Europe

- **International group for personal data protection in telecommunications**

International group for personal data protection in telecommunications is an expert group in which the Directorate is involved from 2007. In 2010, taking in consideration the lack of financial resources, the Directorate attended one of two realized meetings held in Granada in the period from 14—16 April 2010. On this meeting expert group was focused on the aspects of personal data processing through video surveillance of cars, digital data and freedom of information, privacy and e-mailing, privacy and international standards, privacy on social networks.

- **Case handling workshop for personal data protection**

In 2010 the Directorate attended the Case handling workshop held on 18—19 March 2010 in Brussels, Belgium. On this workshop various cases were analyzed from the practice of personal data protection connected to medical data processed for the purposes of scientific research, direct marketing, electronic cards in public transportation, mobility and advertising on the internet.

- **4th Annual conference - Data Protection Intensive**

Annual conference, Data Protection Intensive is a pan-European event organized by the biggest European consultative companies working in the field of personal data protection. This conference is place where interactive presentations are held by the leading experts in the field of privacy protection, consultations and discussions with professionals from this area. On the 4th Annual conference experts gave review of the international data transfer, on line behavior, security of personal data and breach notifications, implementation of regulations. In the session of interactive presentations given by representatives from 30 countries, the Directorate presented the state of affairs in the area of personal data protection in the Republic of Macedonia.

5.2 Activities financed by TAIEX

- **Study visit on the level of protection of special categories of personal data – Commission for personal data protection, Paris, France**

Aim of this study visit of the Commission for personal data protection of the Republic of France was to exchange comparative experiences for processing of special categories of personal data, analyses and exchange of ideas for further regulation of the national legislation. Special accent was given to the manner of implementation of regulations for protection of special categories of personal data, such as: ethnic origin, political and religious beliefs, union membership, health, genetic, biometric data and data connected to the sexual life.

- **Study visit on the implementation of informatics technologies in inspections – Agency for personal data protection, Madrid, Spain**

Fast development of informatics and communication technologies leads to continuous upgrading of their usage. Aim of the study visit of the Agency for personal data protection from Madrid, Spain, was to exchange experiences for the implementation of informatics technologies in inspections, especially when performing inspection over the techniques for control of various types of data bases and methods for identifying ICT security of the data bases.

- **Study visit on public awareness rising - Inspectorate for personal data protection, Oslo, Norway**

Public awareness rising of the citizens for their right of personal data protection is ongoing process that must follow all actual issues of the general and segmented public. Exchange of the experiences for creation of complex action plans and communication strategies was the goal of the study visit of the Inspectorate for personal data protection, Oslo, Norway. During the study visit, all departments within the Inspectorate presented their activities for supporting the public awareness rising.

- **Study visit on video and audio surveillance installed for the purposes of protection of property - Agency for personal data protection, Madrid, Spain**

Aim of the study visit of the Agency for personal data protection, Madrid, Spain was exchange of comparative experiences, analyses, opinions and ideas how to protect the right of personal data protection in cases of performing video and audio surveillance installed for the purposes of protection of property. Main topics discussed during this study visit were implementation of the law and separate sub legal acts for personal data protection in cases of performing video surveillance: traffic security, buildings, health sector, video surveillance of employees.

- **Study visit on the techniques for preparation of Strategic plan - Commission for personal data protection, Wilmslow, UK**

Aim of the study visit on the techniques for preparation of Strategic plan - Commission for personal data protection, Wilmslow, UK was to connect the teams that work on creation of strategic plans of the both authorities and to exchange experiences for the manner of identification of the main goals of the planned period, preparation and implementation of strategic plans, planning on horizontal relations with other institutions, GAP analyses as well as consultation about the procedures of separate institutions.

- **Expert mission on the amendments and modifications on the law on personal data protection**

In 2010, the draft of the amendments and modifications of the Law on personal data protection were finalized. In the final phase of the preparation of the text, the Directorate detected need for expertise in form of commentaries and opinions from aspect of harmonization with the legislation of the European union. For that purpose, TAIEX instrument engaged the expert Mr.Lukas Gundermann from the Institute for personal data protection from the Federal Republic of Germany who gave his contribution through giving review of European trends and influences in the field of personal data protection.

- **Expert mission on the amendments and modifications on the rulebooks for personal data protection**

The process of amending and modifying of the Law on personal data protection was accompanied by the process of amending of the existing and adoption of new rulebooks on personal data protection. Aiming to exchange experiences for practical implementation of the sub legal acts, TAIEX instrument provided team from the Directorate to work with the expert Mr.Andrej Tomsic, deputy director of the Information Commissioner of the Republic of Slovenia.

- **Expert mission on personal data protection and video surveillance and processing of personal data**

With the amendments and modifications of the Law on personal data protection, new obligation was prescribed in the part of performing of video surveillance i.e. adoption of Rulebook on the manner of performing video surveillance. Expert mission was performed by expert Mr. Javier Sempere Samaniego from the Agency for personal data protection, Madrid, Spain and had aim to exchange experiences about the manner of performing inspections by the inspectors from the Directorate in specific cases of video surveillance and processing of biometric data.

- **Workshop on media and personal data protection**

On 19.11.2010 Workshop on media and personal data protection was held. The need for organizing this workshop raised from the increasing number of cases of media publishing personal data of persons being subject of the published information. The target group of the workshop were journalists and editors. Three experts, Natasa Pirc Musar, Information Commissioner of the Republic of Slovenia, Emilio Aced Felez and Javier Sempere Samaniego from the Agency for personal data protection from Spain were invited to share their experiences on the subject through presenting the principles of personal data protection and to answer the question how to strike the balance between privacy and publicity by giving interesting examples for cases and good practices for personal data protection.

5.3 EU integration process

- **National Program for adoption of the *acquis communautaire***

In 2010 the Directorate fulfilled most of the goals towards realization of the basic competencies defined in the Chapter 23—Judiciary and fundamental rights from the National Program for adoption of the *acquis communautaire* (NPAA) for 2010. Measures and activities planned for realization of the goals in the reporting period referred to amendments and modifications of the Law on personal data protection and adoption or modifications of the rulebooks and initiation of fully implementation which made the Directorate operable for realizing the competences prescribed by the new Law as well as strengthening of the institutional capacity especially the inspection departments. At the end of 2010, new, revised NPAA plan for 2011 was created.

- **Subcommittee for justice, freedom and security**

On the 7th meeting of the Subcommittee for justice, freedom and security between the European union and the Republic of Macedonia, held in Skopje in September 2010, once again the main accent was put on the fundamental human rights and right of personal data protection. Work of the Directorate was presented at a appropriate level, through precise and detailed presentation of its development and through the answers of the questions of the European Commission.

- **IPA 2008 – instrument for pre accession to the EU**

The Directorate is beneficiary of the IPA 2008—instrument for pre accession to the EU. In 2010, the final version of the Terms of reference documents was adopted, and the Delegation of the European commission in Skopje enforced the procedure for choosing the best offer from consultants for realization of the project. According to the planned dynamics, initiation date for the project is 10.01.2011, and its duration is 18 months.

Project aim is strengthening the competencies of the Directorate, improved implementation of legislation in the field of personal data protection as well as public awareness rising of the citizens for their right on personal data protection.

Project activities are divided in components following the efforts of the EU for raising public awareness, strengthening of institutional capacities and improving the implementation of regulations.

Component 1: Further alignment of the national regulations with the EU legislation

Component 2: Strengthened operational capacities of the DPDP

Component 3: Higher level of awareness of the general public for data protection as a fundamental right

Component 4: Updated IT infrastructure at the DPDP, including new Web page

- **Project on the Establishment of International Law-Enforcement Coordination Units (ILECUs)**

The main goal of this project is cooperation on an international level of the law enforcement institutions towards fight against all types of organized crime through fast persecution, best organization and introducing international quality standards for exchange of information and data. In the reporting period, Directorate continued to give active participation in the process of creation of the Decision for establishment of International Law-Enforcement Coordination Units (ILECUs), execution of the second monitoring visit of the Republic of Macedonia, preparation of the Guidance for establishment of International Law-Enforcement Coordination Units, execution of the tasks in the area of personal data protection and preparation of the Declaration on cooperation and coordination between the Ministry of Interior, Ministry of Finance - Customs, Ministry of Finance – Finance police, Public prosecution office, Ministry of Justice.

5.4 Public awareness raising

Questions of interest

Public awareness raising and informing the citizens of their right of personal data protection and privacy continuous to be one of the key imperatives in the work of the Directorate in 2010.

The Directorate was oriented to affirmation of the right of personal data protection of the citizens, as well as education of the controllers for respecting their obligations which arise from collecting, processing and retention of personal data of the citizens.

During 2010, questions of interest for the media were:

- Amendments and modifications of the Law on personal data protection;
- Privacy protection of youth when using the social networks and internet in general;
- Personal data protection in education;
- Media as processors of personal data;
- New competencies of the Directorate.

Besides the above mentioned questions of interest, the Directorate continuously informed the public for personal data protection in all other areas.

<i>Media</i>	<i>Number</i>
Newspaper	40
Television	54
Radio	12
Total	105

5.5 Celebrating the 28th January—European day on personal data protection

On January 28 2010, Directorate for Personal Data Protection for the fourth time celebrated **January 28 – European data protection day** by organizing the event “**Open day – data protection fair**”. The event was held in the EU Info Centre premises.

On 28th January 1981, the Convention for the protection of individuals with regard to automatic processing of personal data was open for signatures, and 25 years later, Council of Europe in 2005 decided to announce 28 January as a European day on personal data protection. Main goal of the events organized to celebrate this day is raising the public awareness for personal data protection and informing the citizens for their right of personal data protection and the controllers for their obligations, which would lead to exercising those rights and fulfillment of the obligations in a more effective way.

On the fourth celebration of the European data protection day – January 28, Directorate for Personal Data Protection presented recommendations and advices for protection of personal data in specific areas. On several information counters Directorate’s expert team advised the visitors for the protection of personal data in the following areas:

- Health;
- Internet;
- Video surveillance;
- Legal protection of personal data.

The “Open day” has been visited by interested citizens, natural and legal entities. Also, the event was attended by a large number of controllers which cooperate with the Directorate and great number of media representatives both from electronic and printed media, through which the event was consistently presented to the general public.

6.1 Programme for training of controllers and processors of personal data collections

One of the competencies of the Directorate is conducting training sessions for interested controllers and processors. During 2010, the Directorate applied a new approach to ensure preventive acting over the controllers and processors through organization of trainings which in turn would contribute in accelerating the process of harmonization of the processing of personal data protection with the principles of personal data protection.

In light of performing the competencies, the Directorate in September 2010 prepared and adopted Training program for controllers and processors for 2010 and a special Program for 2011 which despite the generic trainings on personal data protection includes specialized trainings in 13 areas. Training (one day) are organized in the premises of the Directorate and participants receive a certificate for participation on the training.

Publication of Training programs for 2010 and 2011 on the website of the Directorate and the additional direct sending to the controllers (by determined dynamics by areas for 2010 and 2011) contributed to the great interest in participation on training and starting from December 2010, the trainings are organized on a regular weekly basis.

6.2 Training of controllers and processors of personal data collections

During 2010, 10 trainings were organized out of which, 8 trainings followed the Programme for training of controllers and processors of personal data collections and 2 trainings were organized outside of the Directorate upon request of state authorities. The number of participants who have participated on training for personal data protection is 174 participants out of which in the first half of the year 35 and in the last quarter, after the amendments and modifications of the Law on personal data protection entered into force, number of participants raised to 149 .

6.3 Participation in other training

In 2010, the Directorate actively participated in workshops, panel discussions, round tables and presented different aspects of personal data protection.

- Safer Internet Day, organized by the Metamorphosis Foundation
- Safety on the Internet, organized by Microsoft Macedonia
- Safety of children online, Georgi Dimitrov High School

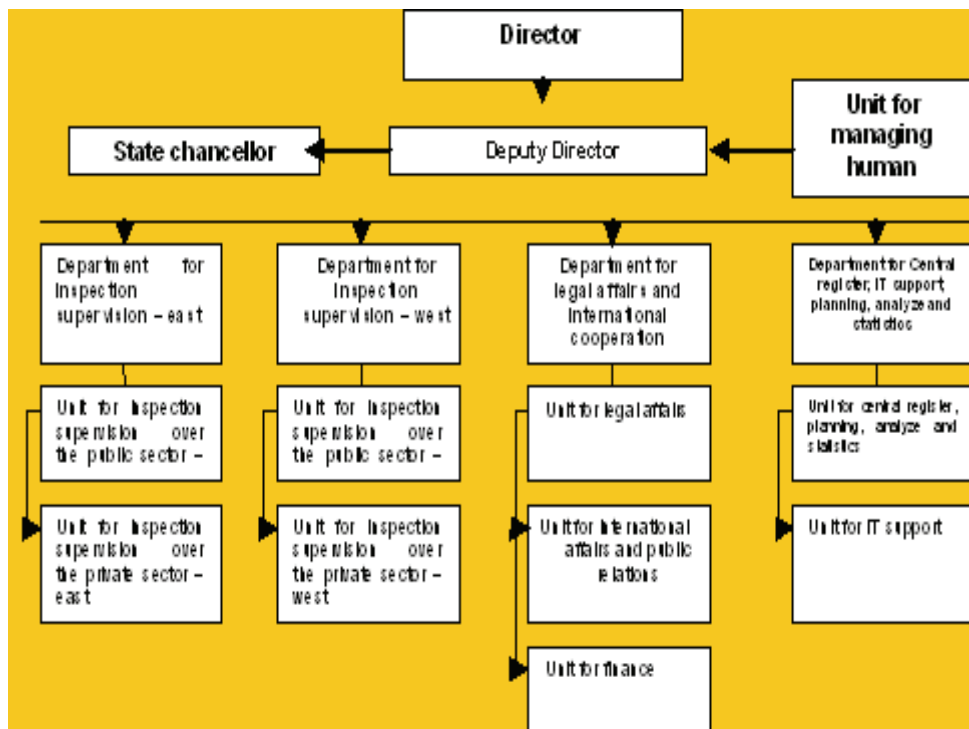
Directorate's misdemeanor commission is constituted in accordance to the Law. Pursuant to the Law on on misdemeanours, the Directorate is a misdemeanor body and through the Misdemeanor commission imposes fines for abuses of the right to privacy. In the reporting period the Commission has submitted 32 requests for initiation of misdemeanor proceedings out of which 25 procedures were completed, in 4 procedures decision for refusal was brought and 3 procedures are still ongoing.

Total number of requests for initiating the misdemeanor procedure in 2010	Determined in 2010	Re-fused	Transferred in 2011
32	25	4	3
100%	78.1	12.5	9.4

In 2010, the Directorate has received 11 requests for free access to public information. Respecting the legally determined deadlines, Directorate acted upon all requests and answered positively to all the 10 requests, i.e. Directorate was the holder of the information. Directorate, ex officio sent a request to another state body that had the information about who the holder of the requested information was. There were no complaints and administrative disputes against the Directorate's response to the requests for free access to public information.

Total number of requests	Positive answered requests	Number of requests forwarded to the holder of the information	Број на одбиени барања Number of rejected applications	Number of filed appeals and decisions	Number of initiated administrative disputes
11	10	1	/	/	/

In order to create conditions for efficient execution of duties and tasks raising from the competencies of the Directorate and according to the documents on internal organization and systematization of working positions in the Directorate, which are fully harmonized with the Regulation on Internal Organization of State Administration and Regulation on description of the positions of civil servants, the Directorate provided the following organizational units.



As it is shown in the organizational structure in 2010, the novelty is the new division of the Department for inspection on Department for inspection – East and Department for inspection – West in order to strengthen the powers of inspection. Another novelty is the filiation of the Unit for International Cooperation and Public Relations and Unit for Financial Affairs in the Department for Legal Affairs and International Cooperation, as well as the IT Support Unit in the Department for Central register, information support, strategic planning and analysis.

For 2010, seven (7) new employments were projected out of which the Directorate received approval for employment of civil servants from the Agency for Civil Servants for four (4), but by the end of 2010 financial resources for those employments were not provided from the Ministry of Finance.

During 2010 two civil servants ended their employment upon their request and one civil servant was employed on the basis on agreement for taking over from another institution, so that at the end of the year the total number of employed civil servants in the Directorate 19.

Two law graduate-assistants were engaged in the Directorate through the project for Approximation of legislation of the Republic of Macedonia, financed by FOSIM. The assistants worked in the Department for Legal Affairs and the Department for inspection on the basis of agreement for cooperation between the Directorate and FOSIM, signed in March 2009.

The educational structure of employed civil servants in 2010 is as follows: sixteen civil servants with high education out of which ten law graduates, two economists, two computer science engineers, one political science graduate and one graduate teacher (pedagogue) and three civil servants with secondary education.

In 2010, on the basis of the program for volunteers and interns in the Directorate 4 people volunteered. All of them had VII-1 degree of education

10.1. Realization of the budget for 2010 – account type 637

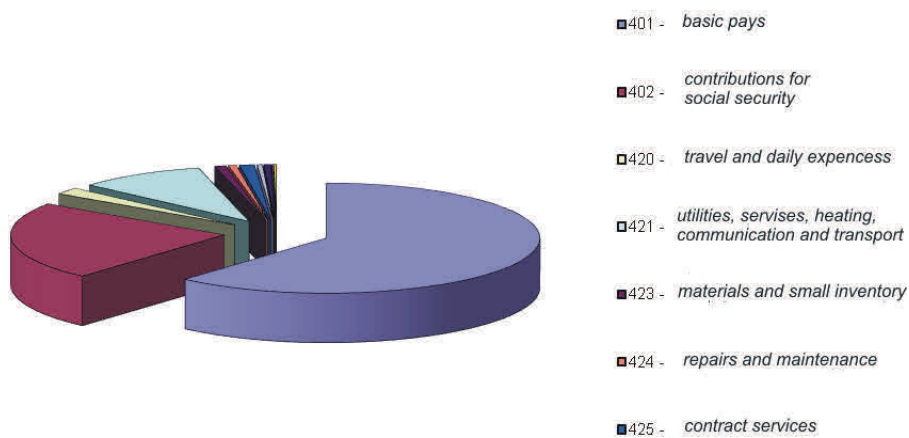
The annual financial statement for 2010 for the account 637 of the Directorate is accepted on 25.02.2011, with the following indicators:

	Denars
Entire budget for 2010	12.452.000
Entire realized income (transfers from the budget of the RM)	11.593.348
Entire realized spending	11.593.348
Net revenue surplus - profit prior taxation	0
Income tax revenue surplus - profits	0
Net revenue surplus - profit for transmission for next year	0

From the entire approved budget of the Directorate for 2010 in amount of 12,452,000 denars, 93.10% were realized i.e. 11,593,348 denars. Regarding the structure of the entire approved budget, out from the re-allocations of funds during 2010, 10,528,000 denars, or 84.55% of the resources were related to basic payments and social security contributions, 1,822,000 denars or 14.63% of the resources were related to goods and services and 102,000 denars, or 0.82% of the resources were related to capital expenditures.

.Table 1 - Overview of the realization of the financial resources by items in 2010

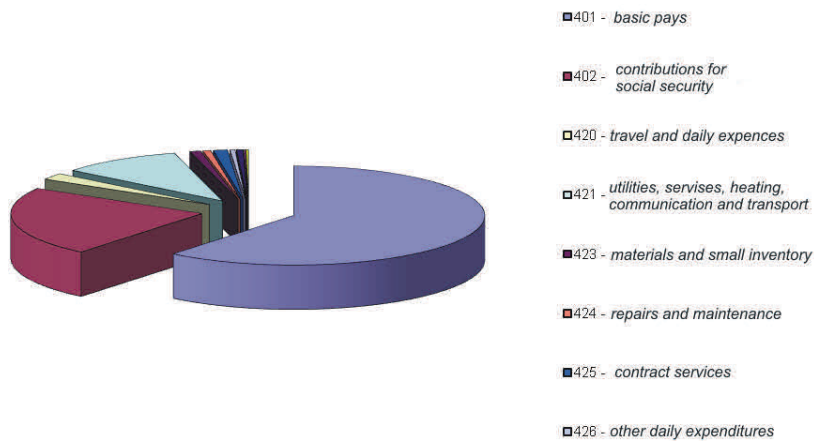
Structure for the total approved Budget for 2010



Item	Budget 2010	Realization	% of realization
401	7.661.000	7.054.392	92,08
402	2.867.000	2.626.373	91,61
420	247.500	247.477	99,99
421	1.200.000	1.193.370,50	99,45
423	105.800	105.789,50	99,99
424	76.500	76.353	99,81
425	142.200	138.215	97,20
426	50.000	49.973	99,95
480	64.500	64.269	99,64
483	13.000	12.744	98,03
485	24.500	24.392	99,56
Total	12.452.000	11.593.348	93,10

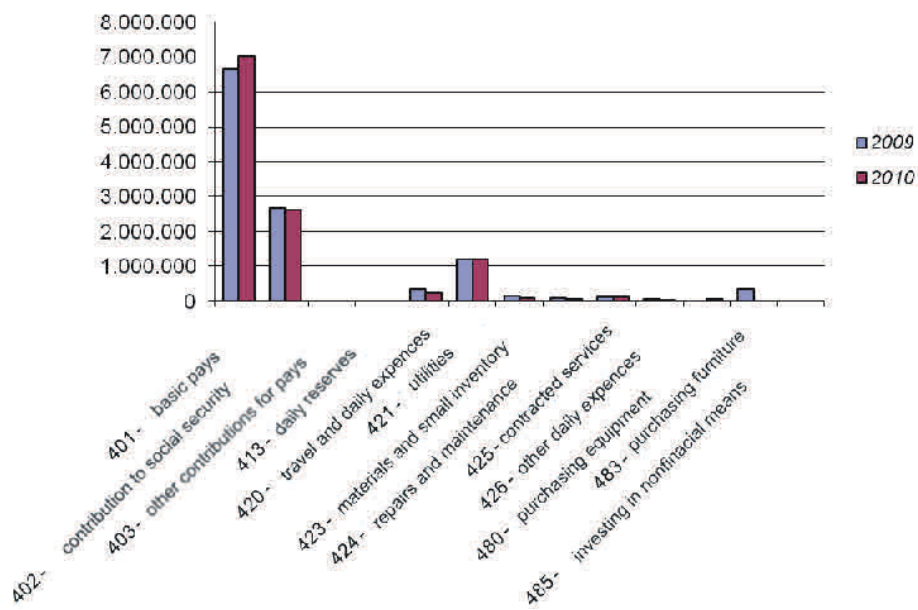
Table 2 – Comparative overview of the realization of the financial resources by items - 2009 - 2010

Realization of funds by items in 2010



Item	Realization 2009	Realization 2010	2009/2010 by percentage
401	6.664.115	7.054.392	94,47
402	2.683.212	2.626.373	102,21
403	1.257		
413	15.000	0	0
420	342.829	247.477	138,53
421	1.201.765	1.193.370,50	100,70
423	132.509	105.789,50	125,26
424	99.960	76.353	130,92
425	122.444	138.215	88,59
426	66.000	49.973	132,07
480	357.000	64.269	463,56
483		12.744	
485	0	24.392	0
Total	11.686.091	11.593.348	100,80

Comparative overview of the realizations of funds
2009 comparing 2010



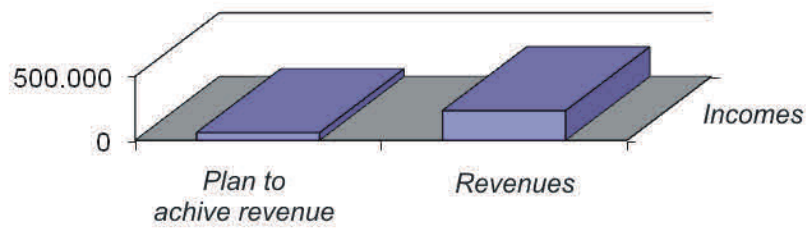
10.2. Realization of the budget for 2010 - account type 631

The annual financial statement for 2010 for the account type 631 of the Directorate is accepted on 25.02.2011 година with the following indicators:

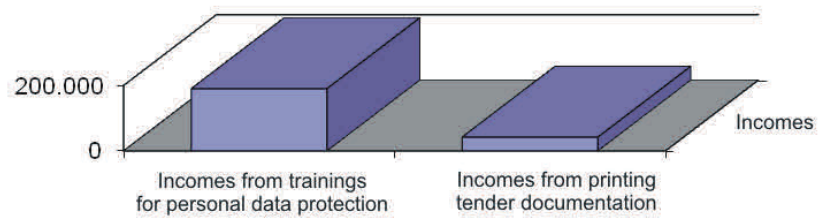
	<i>Denars</i>
Entire budget for 2010	60.000
Entire realized income (transfers from the budget of the RM)	232.000
Entire realized spending	17.732
Net revenue surplus - profit prior taxation	214.268
Income tax revenue surplus - profits	214.268
Net revenue surplus - profit for transmission for next year	214.268

With the Draft budget for 2010 the Directorate projected that on the basis of trainings for personal data protection for controllers and processors interested in personal data total income of MKD 60,000 would be realized. In 2010, on the basis of trainings for personal data protection, total generated income is MKD 190,000 and the fee for printing the tender documents has been a total income of 42,000 denars.

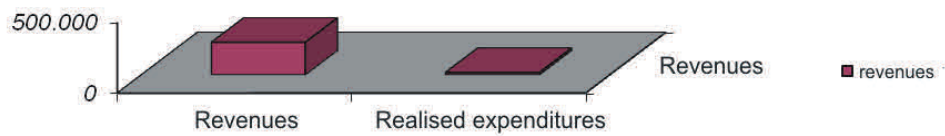
Plan in terms of revenue



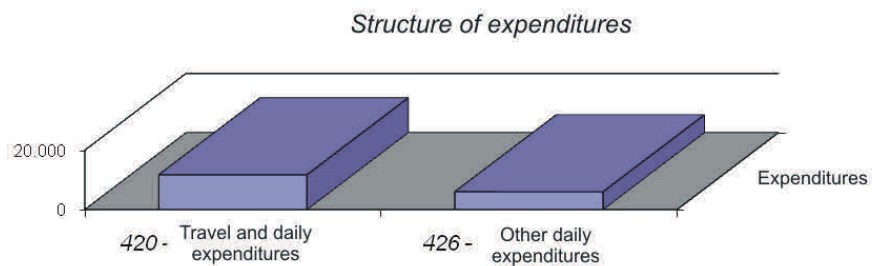
Structure of incomes



Revenues realized in terms of expenditure



Regarding the realization of the financial funds from the account type 631 of the Directorate total expenditure of 17.732 denars are made, from which 6.000 denars expenditures are made for representative materials and 11.732 denars are made for incidental travel expenses.



Picture number 1

Inspections initiated in 2009 and transferred in 2010	24
Initiated and performed inspections in 2010 (Minutes and decisions)	93
Total	117

Picture number 2

	Overtaken inspections from 2009	Performed inspections in 2010	Total
Regular Inspections	9	35	44
Ad hoc inspections	15	41	56
Control Inspections	/	17	17
Total	24	93	117

Picture 3

Performed inspections in the public sector	58
Performed inspections in the private sector	53
Performed inspections to natural persons	6
Total	117

Table preview on Inspections in 2010

Regular Inspections

Number	Area defined in the Annual Program	Name and address of the controller / processor	Date of inspection	Sector	Note / current status
1.	Health	Fund for health insurance Skopje	18.02.2010	Public	Proposal for settlement
2.	Social insurance	Fund for pension and disability insurance in Macedonia	04.03.2010	Public	Decision sent
3.	State Authorities	Agency for Supervision of Financial Capital Pension MAPAS	10.03.2010	Public	Decision sent
4.	Local self-government	Municipality Aerodrom Skopje	15.03.2010 03.05.2010	Public	Decision sent
5.	Local self-government	Municipality Centar Skopje	16.03.2010	Public	Decision sent
6.	Trade	Bomas Skopje	22.03.2010	Private	Decision sent
7.	Trade	Torone Skopje	18.03.2010	Private	Decision sent
8.	Local self-government	Municipality Butel	19.03.2010 03.05.2010 14.05.2010	Public	Decision sent

Number	Area defined in the Annual Program	Name and address of the controller/processor	Date of inspection	Sector	Note / current status
9.	Public Prosecutor Office	PPO for prosecuting organized crime and corruption	31.03.2010	Public	Decision sent
10.	Education	ASUC Boro Petrusovski Skopje	11.03.2010	Public	Minutes sent
11.	State Authorities	Ministry of economy	10.06.2010 09.07.2010 29.09.2010	Public	Decision sent
12.	Processor	EOS Matriks Skopje	22.06.2010 01.07.2010	Private	Decision sent
13.	Processor	Creditekspers Skopje	24.06.2010 07.07.2010 13.07.2010	Private	Decision sent
14.	Processor	Mellon Solutions	29.06.2010 14.07.2010	Private	Decision sent
15.	Controller	PE for Housing and office space - Skopje	15.06.2010	Public	Decision sent
16.	Controller	City parking Skopje	18.06.2010	Public	Decision sent
17.	Education	PS 11 October Skopje	12.07.2010 31.08.2010	Public	Decision sent
18.	Trade	K&K LTD and DOO Skopje (Tehnomarket)	17.08.2010	Private	Decision sent

Number	Area defined in the Annual Program	Name and address of the controller / processor	Date of inspection	Sector	Note / current status
19.	Trade	Neptun Euromedia Skopje	15.07.2010	Private	Decision sent
20.	Trade	Frigo Shop Skopje	29.09.2010	Private	Decision sent
21.	Education	PS Goce Delcev Skopje	30.09.2010	Public	Decision sent
22.	Education	PS Kiril and Metodij Skopje	29.09.2010	Public	Decision sent
23.	Education	Faculty of Law	13.10.2010	Public	Decision sent
24.	Education	American College	15.10.2010	Private	Decision sent
25.	Banking	Sparkasse bank Skopje	20.10.2010	Private	Minutes sent
26.	Banking	Uni Bank Skopje	21.10.2010 02.11.2010	Private	Minutes sent
27.	Banking	Alfa Bank Skopje	25.10.2010 04.11.2010 29.11.2010	Private	Inspection is completed
28.	State authorities	Bureau of Education Development	19.10.2010 25.10.2010	Public	Decision sent
29.	State authorities	Ministry of Transport and Communications	28.10.2010 10.11.2010	Public	Minutes sent

Number	Area defined in the Annual Program	Name and address of the controller / processor	Date of inspection	Sector	Note / current status
30.	State Authorities	State Statistical Office	26.11.2010 23.12.2010	Public	Inspection continues
31.	State Authorities	State Education Inspectorate	30.11.2010 24.12.2010	Public	Inspection is completed
32.	State Authorities	Department of General Affairs Government of the Republic Macedonia	24.11.2010 17.12.2010 27.12.2010	Public	Inspection is completed
33.	Insurance	National Bureau of Insurance	22.11.2010 22.11.2010	Private	Inspection is completed
34.	Insurance	Croatia Insurance	23.11.2010 20.12.2010	Private	Inspection is completed
35.	Insurance	Kjubi Makedonija	18.11.2010 21.12.2010	Private	Inspection is completed

Ad hoc inspections

Number	Area defined in the Annual Program	Name and address of the controller / processor	Date of inspection	Sector	Note / current status
1.	State Authorities	State statistical Office	18.01.2010	Public	Decision sent
2.	Trade	Café New York Skopje	29.01.2010	Private	Decision sent
3.	Individual	V.C. Skopje	05.03.2010	Private	Decision sent
4.	Tourisam	Ski center Zare Lazarevski Mavrovo	13.05.2010	Private	Decision sent
5.	Tourisam	Motel Bistra Mavrovo	13.05.2010	Private	Decision sent
6.	Tourisam	Hotel Alpina Mavrovo	13.05.2010	Private	Decision sent
7.	Tourisam	Restaurant Mal odmor Mavrovo	13.05.2010	Private	Decision sent
8.	Individual	V.G.Skopje Ckonje	04.02.2010 09.02.2010	Private	Decision sent
9.	Health	Clinic otorinolaringology	03.03.2010 05.03.2010	Public	Decision sent
10.	Citizens association	Association of Drivers Delcevo	12.05.2010	Public	Decision sent



Table overview on Inspections in 2010

Bp.	Area defined in the Annual Program	Name and address of the controller / processor	Date of inspection	Sector	Note / current status
11.	Education	Municipal Secondary School Gostivar	13.05.2010	Public	Decision sent
12.	Social protection	JUDG 13-Noemvri Skopje and JUDG 13-ti Noemvri Skopje	13.04.2010	Public	Decision sent
13.	Trade	Hotel Kontinental Skopje	15.04.2010	Private	Decision sent
14.	Education	Lazar Tanev Skopje	22.04.2010	Public	Decision sent
15.	Health	ING Diagnostics Skopje	28.04.2010	Private	Decision sent
16.	Health	University Clinic for Lung Diseases at Children Kozle	28.04.2010	Public	Decision sent
17.	Health	University Clinic for Gynecology and Obstetrics, Skopje	28.04.2010	Public	Decision sent
18.	Direct marketing	Macedonian Telecom	29.04.2010	Private	Decision sent
19.	Trade	Restaurant Ginno	30.04.2010	Private	Decision sent
20.	State authorities	Public revenue office	14.05.2010	Public	Decision sent

Number	Area defined in the Annual Program	Name and address of the controller / processor	Date of inspection	Sector	Note / current status
21.	State Authorities	Ministry of Interior, Department of the Interior Strumica	18.05.2010	Public	Minutes sent
22.	Local self government	Municipality Sopište	20.05.2010	Public	Decision sent
23.	State Authorities	Ministry of economy	31.05.2010	Public	Minutes sent
24.		Next Sense	31.05.2010	Private	Minutes sent
25.		Euro Anser Skopje	20.05.2010	Private	Decision sent
26.	Marketing agency	Akvila corporate Skopje	18.06.2010	Private	Decision sent
27.	Controller	AD EVN Macedonia	21.06.2010	Public	Decision sent
28.	State Authorities	Ministry of interior—police station BEKO	15.07.2010	Public	Inspection continued
29.	Catering	Coffe bar GRUV	27.07.2010	Приватен- private	Minutes sent
30.	Banking	Stopanska banka	06.09.2010 08.10.2010	Приватен- private	Decision sent

Number	Area defined in the Annual Program	Name and address of the controller / processor	Date of inspection	Sector	Note / current status
31.	Real estate agency	Millennium	28.09.2010	Private	Minutes sent
32.		Company for services DHTCM DOOEL Skopje	05.10.2010	Private	Decision sent
33.	Hotels	Macedonia Turist Skopje	13.10.2010	Private	Decision sent
34.	Insurance	Euroins insurance	08.11.2010	Private	Decision sent
35.	Health	University Clinic for surgical disease (City Hospital Skopje)	11.11.2010	Public	Inspection is completed
36.	Telecommunications	ONE telecommunications services	16.11.2010	Private	Decision sent
37.	Individuals	N.N. Skopje	21.12.2010 27.12.2010	Private	Inspection continued
38.	State Authorities	Public revenue office	23.12.2010	Public	Inspection continued
39.	Local self government	Municipality Berovo	15.10.2010	Public	Inspection continued
40.	Marketing agency	IP-SOS Strategic plus DOOEL Skopje	27.12.2010	Private	Inspection continued
41.	Media	A1 TV journalist Mence Atanasova Toci	30.12.2010	Public	Inspection continued

Control Inspection Supervision

Number	Area defined in the Annual Program	Name and address of the controller / processor	Date of inspection	Sector	Note / current status
1.	Health	Hospital addictive diseases –Kisela Voda	08.02.2010	Public	Minutes sent
2.	Health	City hospital Sv.Naum Ohridski Skopje	16.02.2010	Public	Minutes sent
3.	Health	Mala Bogorodica Sistina Skopje	16.02.2010	Public	Minutes sent
4.	Education	Secondary School Vasil Antevski Dren Skopje	23.02.2010	Public	Minutes for settlement
5.	Education	Secondary School Vlado Tasevski Skopje	23.02.2010	Public	Minutes for settlement
6.	Health	Poly-clinic Jane Sandanski	23.02.2010	Public	Minutes sent
7.	Education	Secondary School Josip Broz Tito Skopje	24.02.2010	Public	Inspection continued
8.	Education	Ministry of Education and Science	25.02.2010	Public	Minutes for settlement

Number	Area defined in the Annual Program	Name and address of the controller / processor	Date of inspection	Sector	Note / current status
9.	Education	Nova International School Skopje	25.02.2010	Private	Minutes for settlement
10.	Education	Secondary school Orce Nikolov Skopje	25.02.2010	Public	Minutes for settlement
11.	Individuals	Z.T. Skopje	25.02.2010	Private	Minutes sent
12.	Education	First Private University F ON	23.03.2010	Private	Minutes for settlement
13.	Education	Faculty of Economics Skopje	25.03.2010	Public	Minutes for settlement
14.	Local self government	Municipality Kisela Voda	29.03.2010	Public	Minutes for settlement
15.	Insurance	Vardar insurance AD Skopje	24.03.2010	Private	Minutes sent
16.	Transport of passengers	JSP	31.03.2010	Public	Minutes sent
17.	Health	University Clinic for Radiotherapy and Oncology	07.05.2010	Public	Minutes for settlement