




Legal Alert

The new Rulebook on Personal Data Processing Security with a compliance deadline of July 1, 2025.

On December 25th, 2024, the Agency for Personal Data Protection issued a new Rulebook on Security of Personal Data Processing, introducing detailed guidelines and requirements regarding personal data security.

Changes and Requirements:

- **Information System Establishment and Documentation:** Controllers are obligated to prepare and maintain comprehensive documentation for all information systems that process personal data. This includes:
 - Defining the purposes of processing.
 - Mapping and documenting each personal data processing activity.
 - Recording the technical specifications of the system.
- **Information System Maintenance and Updates:** The Rulebook mandates ongoing review and updates to information systems, particularly focusing on:
 - Technical and organizational measures employed to ensure data security.
 - Ensuring compliance with the Rulebook by any third parties responsible for system maintenance.
- **International Data Transfers:** The transfer of personal data to third countries is limited to situations compliant with North Macedonian data protection regulations, emphasizing the need for thorough assessments of all international data transfers.

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- **Documented Data Protection System:** Controllers are required to establish and maintain a comprehensive, documented data protection system, which must be:
 - Proportionate to the nature, scope, and risks associated with data processing activities.
 - Inclusive of technical and organizational measures to guarantee data security objectives.
 - **Proactive Risk Management:** A key aspect of the Rulebook is the obligation for controllers to conduct:
 - Regular and documented risk assessments, considering a wide array of threats to data security, including unauthorized access, data loss, and unlawful data alteration.
 - Implementation of appropriate technical and organizational measures to address identified risks.
 - The Rulebook includes two annexes for guidance Annex 1: Details the methodology for conducting risk assessments and Annex 2: Defines data protection goals, potential threats, and the required security measures
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 - **Furthermore, the Agency has introduced amendments to the Rulebook on the Manner of Reporting Personal Data Breaches**, adding a new obligation for companies to:
 - Document any forensic investigations or expert examinations related to data breaches with corresponding numbers and dates as well as the results of such investigations and examinations.
 - The fines that may be imposed in case of determined misdemeanours remain the same, up to 4% of the total annual income of the company realized in the business year preceding the year in which the violation was committed.

Papazoski and Mishev Law Firm can provide you with:

- Support in performing GAP analysis for new and existing clients of the subjects of the Rulebook.
- Preparation of complete documentation for the new subjects of the Rulebook;
- Help desk support to the data protection officers of the subjects of the Rulebook;

For more details, please refer to your usual contact within Papazoski and Mishev Law Firm or the persons indicated in the Contacts Section.

Contact our team

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