



## 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.

- **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
- **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

**Biljana Volcheska Aceska**  
Senior Associate, DPO,  
Data Protection Consultant  
 [biljana.volcheska@pwc.com](mailto:biljana.volcheska@pwc.com)

**Ivan Mishev**  
Attorney-at-law  
 [ivan.mishev@pwc.com](mailto:ivan.mishev@pwc.com)

Legal Disclaimer: The material contained in this alert is provided for general information purposes only and does not contain a comprehensive analysis of each item described. Before taking (or not taking) any action, readers should seek professional advice specific to their situation. No liability is accepted for acts or omissions taken in reliance upon the contents of this alert.