

How to harmonize operations with the General Regulation on Data Protection, what are all the obligations regarding the collection and processing of personal data and what are the specifics of security, was presented at today's free online interactive workshop organized by the Personal Data Protection Agency (AZOP) and the Croatian Chamber of Commerce . On behalf of the Personal Data Protection Agency and the Director, Mr. Zdravko Vukić, participants were greeted by Mario Milner, Senior Specialist Advisor and pointed out that the workshop is held as part of the EU project ARC (Awareness Raising Campaign for SMEs) to support small and medium enterprises in aligning business processes with GDPR.

Advisor to the President of the Croatian Chamber of Commerce and Head of the Department of Education and Information Security doc.dr.sc. Petar Mišević emphasized the importance of the Decree in the context of trends and digital transformation of the entire Croatian economy, within which a large amount of data is processed in digital format, in which security companies also participate as executors of processing.

President of the Association of Investigative and Protective Activities of the Croatian Chamber of Commerce Zdravko Prša thanked the Croatian Chamber of Commerce and AZOP for holding the training and said that the new normal with all its shortcomings brings something good such as this training because quality data from top lecturers can be listened to online. Participants in the training were introduced to the basic concepts of the Regulation (processing manager, processor, recipient, third party), the legislative framework for their work, and given the specifics of the profession as exceptions are listed; national security, common foreign and security policy, in order to prevent the investigation, detection or prosecution of criminal offenses and activities of a natural person for his own needs (eg video surveillance).

The principles of personal data processing are legality, fairness and transparency, purpose limitation, data reduction, accuracy, storage limitation, integrity and confidentiality, noting that the controller is responsible for compliance and must be able to prove it.

The participants were more interested in the processing of personal data through video surveillance (surveillance of work premises, residential buildings and public areas) to which, unless otherwise provided by another law, the provisions of the General Data Protection Regulation Act apply. Thus video surveillance can be covered; premises, parts of premises, external surface of the building, as well as internal space in public transport. On the other hand, the processing manager / executor is obliged to indicate that the object or individual room in it and the outer surface of the object are under video surveillance, and the mark should be visible no later than when entering the perimeter of the recording. The notice should contain all relevant

information in accordance with the Regulation, and in particular a simple and easy-to-understand image with text providing information that the space is under video surveillance, information about the processing manager and contact through which the respondent can exercise his rights. Recordings obtained through video surveillance may be kept for a maximum of six months, unless another law prescribes a longer retention period or if the evidence is in court, administrative, arbitration or other equivalent proceedings.

The training also focused on the processing of biometric data, which are defined as personal data obtained by special technical processing related to physical or physiological characteristics of an individual that enable or confirm the unique identification of that individual, such as papillary lines of fingers, palms and feet, photographs, facial representations, DNA profile and iris of the eye. The legal basis for the processing of biometric data of respondents in order to securely identify service users is the explicit consent of such respondents given in accordance with the provisions of the General Regulation on Data Protection.

Regarding personal data in the context of the COVID-19 pandemic, it was pointed out that controllers performing service activities are obliged to ensure that in accordance with the CNIPH Recommendation, personal data are collected / processed that are relevant to the purpose for which they are processed. (pandemics - endangering public health). The introductory provision of the General Data Protection Regulation was also emphasized, which states that the processing of personal data should be designed to be in the service of humanity. It also stipulates that the right to the protection of personal data is not an absolute right and must be considered in relation to its function in society and equated with other fundamental rights in accordance with the principle of proportionality.