

KOMISIONERI PËR TË DREJTËN  
E INFORMIMIT DHE MBROJTJEN  
E TË DHËNAVE PERSONALE

# ANNUAL REPORT 2014

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## **I. MISSION AND MAIN OBJECTIVES FOR 2014**

Guaranteeing two constitutional human rights, namely the right to information and protection of personal data, consists the mission of the Commissioner's Office for the Right to Information and Protection of Personal Data (CORIPPD). In the course of 2014, the institutional activity initially focused on the protection of personal data and subsequently on the other important pillar, the right to information. The achieved progress, being intensified in the recent months, has been preceded by the basic laws regulating the activity of this institution, recommendations of the Assembly of the Republic of Albania, contained in the Resolution "*On the evaluation of the performance of the Commissioner for the Protection of Personal Data for 2013*", as well as *EU Progress Report*.

In the course of its activity, the Office of the Commissioner considered its priorities to be the prevention and avoiding the incidence of illegal processing of personal data. Strengthening the implementation of the law was closely connected to the consolidation and improvement of the bylaw framework, as well as with our active role to provide legal assistance to the various public and private entities. An increase of the number of draft-laws and bylaw draft-acts coming for feedback has been found out. This is an indicative fact of the creation of a legal culture regarding the protection of personal data and development the trust for the role of the Office of the Commissioner.

This report identifies launching new initiatives regarding the improvement of the techniques of administrative investigation, being reflected chiefly in the recent months of the calendar year 2014, as a consequence of which the number of inspections has increased considerably. The entirety of the administrative investigation proceedings is a consequence of the complaints from entities, but also administrative proceedings launched *ex officio* by the Office of the Commissioner.

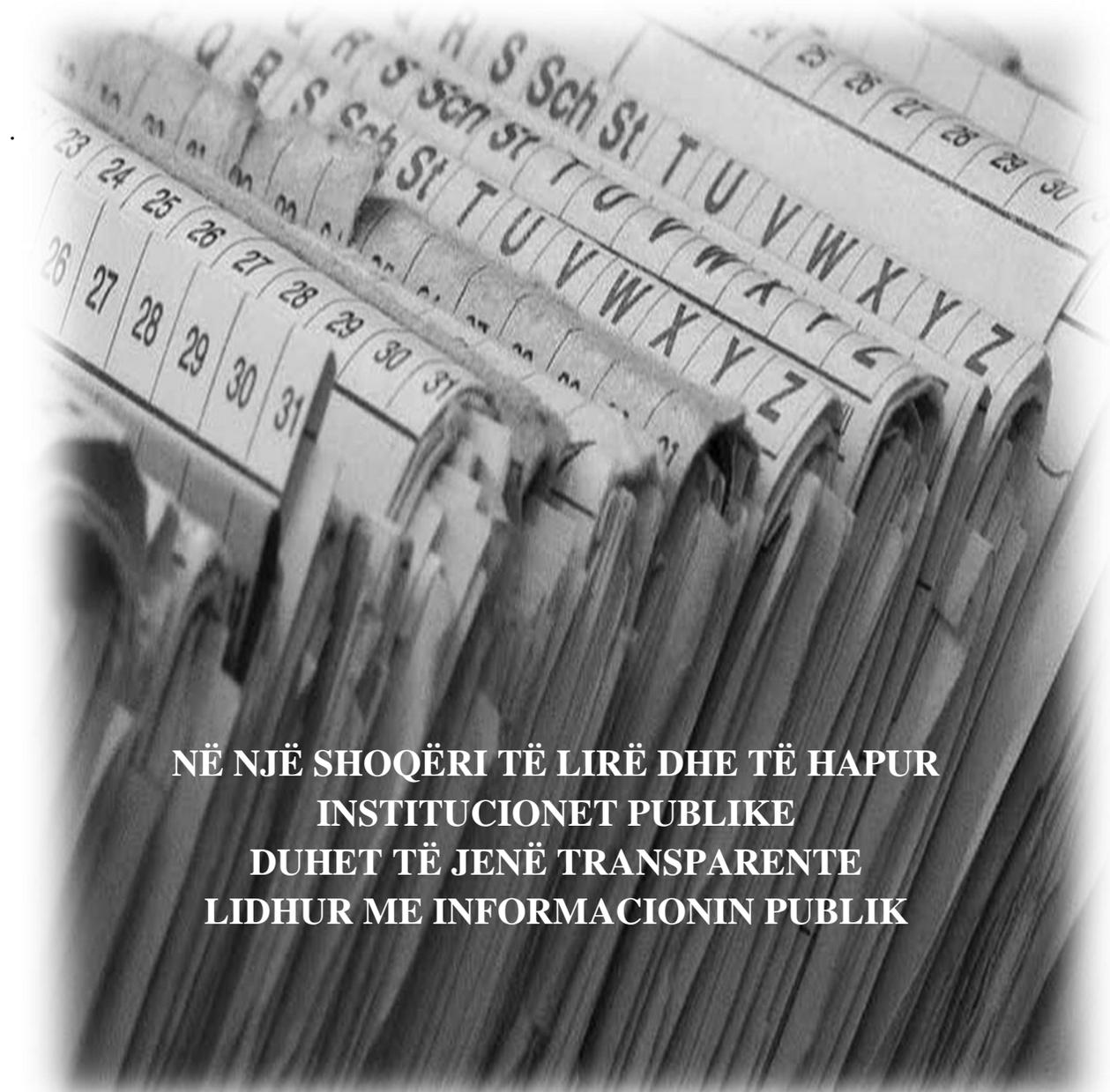
The budget implementation is another institutional important element. In the course of this year, the approved budget expenditure has been administered appropriately, in reliance on the assumption of powers and functions of the Office, regarding the monitoring of two laws, accomplishment of administrative investigations, awareness, improvement of the image and strengthening the public trust to the Office.

The approval of the Law no 119, dated 18/09/2014, "On the right to information" consists another important point worth being evaluated in the activity of the Office of Commissioner for 2014. In November, the powers provided for in this law were vested with the Office of the Commissioner, thus providing another countenance to the institution. Naturally, efforts were focused on the identification of first objectives and the need to be committed to achieve them. The focus was mainly monitoring the implementation of the law, awareness of the public and

social authorities in their entirety, processing the complaints of individuals in time, preparing the model transparency program, etc.

A further novelty for 2014 was the approval on 30 Oct 2014 by the Assembly of Albania of the law no 146/2014 “On the public notification and consultation”. The scope of this law is the regulation of relations being established in a public, transparent and all-inclusive consultation process regarding the decision-making procedure of the draft-acts of normative character, strategic national and local documents and polices of high public interest. The law has provided for the complaint before the Commissioner for the Right to Information and Protection of Personal Data in case the interested parties hold that the public authority has encroached on their right for public notification and consultation. This law enters into effect in May 2015.

CRIPPD has marked achievements also in the field of cross-institutional and international relations. The Office of the Commissioner has been represented in many important international meetings.



**NË NJË SHOQËRI TË LIRË DHE TË HAPUR  
INSTITUCIONET PUBLIKE  
DUHET TË JENË TRANSPARENTE  
LIDHUR ME INFORMACIONIN PUBLIK**

## II. RIGHT TO INFORMATION

### II.1 Law 119/2014 “On the right to information”

The law no 119/2014 “On the right to information” was approved by the Assembly on 18 Sept 2014 and it was published in the Official Journal no 160, dated 17 Oct 2014. This law aims at guaranteeing concrete rules for the protection and transforming the right to information into a realistic right and easily applicable in practice.

Reforming this law aligns it with the advanced regional legislation and beyond. The right to information and protection of personal data are two separate fields which should be dealt with jointly, since only in this way a balance between them can be established and the privacy of the individual may be protected even when information on official documents is provided. The best international practices and experiences were taken as a reference and it was decided that one of the other important pillars and the right to information to be added under the scope of authority of the authority of the protection of personal data.

Novelties brought about by the law “On the right to information” focus on:

- Defining the two categories of information being made public without or with request;
- Protection of the right to information for every individual, without any need to clarify the motives;
- Regulating the recognition of public official information/document;
- Regulating the preparation and approval of transparency programs;
- Establishing a new position, such as the coordinator for the right to information and the provision of his powers;
- Regulation of powers and procedures for examining the complaints;
- Providing for the right to information;
- Providing for the administrative contraventions and sanctions.

The powers and procedures for examining the complaints have been assigned to the Commissioner for the Right to Information and Protection of Personal Data.

### II.2 Monitoring the law on the Right to Information t

The time schedule for assuming powers under the law on the right to information for 2014 is short, since it pertains to the two last months of the year, however, the cases dealt with were numerous, which occasioned an immediate commitment of the existing resources.

Starting from November until December, **26 complains** were field with the Office of the Commissioner by the natural persons or legal entities connected to the failure to abide by the guarantee of the right to information. Out of these complaints, just 4 were delegated by the

institution of the Ombudsman. In the meantime, out of the total number of complaints, for 5 cases an inspection was conducted, for 3 cases hearings were held, while **2 decisions were rendered** for admitting the subject matter of the complaint and ordering the respective authorities to provide the required information.

Referring to the examined cases, the Office of Commissioner finds out that the law on the right to information has not been applied to the required extent by the public central and local administration, thus circumventing their obligations for providing the requested information, in line with the written request of individuals.

The public authorities have not appointed the coordinator yet, the latter being an obligation provided for in the law. The Commissioner has, in any instance of written correspondence or in activities held to this effect, requested to meet this legal obligation. Only 4 (four) public authorities have notified the appointment of the coordinator. In the meantime, no administrative sanctions have been issued in order to give the opportunity to the public authorities to acquaint themselves with the legal procedures and meeting the obligation within a time period of 6 months for the approval and implementing the transparency program.

Being totally committed and in compliance with our legal obligations, there was drafted and approved, upon the order of the Commissioner no 14, dated 22/01/2015, “Model Program of Transparency for public authorities”, a document already published in the official website of CRIPPD [www.idp.al](http://www.idp.al) and in the *Official Journal no 6, dated 28 January 2015*.

### **II.3 Activities on the right to information**

To the effect of dynamic development of this legal framework, the Office of the Commissioner for the Right to Information and Protection of Personal Data, in cooperation with the Foundation Open Society for Albania OSFA, organised on 18 December 2014 the Conference “Right to Information and Public Authorities”. The purpose of the Conference was to introduce the novelties of the newly approved law no 119/2014 “On the right to Information” to the senior employees of the public administration. The Office of the Commissioner introduced, during the conference, to the main stakeholders of the public central and local administration and civil society, the draft acts being approved in compliance with the right to information facilitating the public consultation prior to the final approval, thus setting out a 1-month period for feedback.

### **II.4 Problems of implementing the law “On the right to information”**

In the course of examining the initial issues surrounding the right to information, we have highlighted problems connected to the contents of the provisions of the law, as well as their concrete implementation. Some of these problems are as follows:

- Examination of the case is made to the effect of finding the abidance by the procedures by the public authorities for processing the request, while the Commissioner needs to determine also the examination of the merits of these complaints;
- The category of “Public Authorities” needs to be categorised, since some of them, although they assume public functions, they do not meet the criteria set out in the contents of this definition.
- The same definition is valid also for the judicial system, since the complaints are addressed even for being provided with a judgement or a judicial file among the litigants. While a response is needed to be provided by the judicial authority/system, the judicial proceedings continue in compliance with the civil, criminal and administrative legislation;
- The term “public information” needs to be clarified (regarding the emerged information);
- Failure by the Public Authorities to make arrangements, in compliance with Article 10 of the Law, to appoint one of the employees as a coordinator for the right to information, to whom the law has assigned some powers, and this is an essential hindrance for the implementation of this law in time and at the required quality.
- The analysis of the 15-day period for examining the complaints in specific cases seems insufficient, where regarding some acts, such as the case of submissions or conduct of hearings, there is a need to refer to the timing set out in the Administrative Procedure Code or in the Law no 10 279, dated 20/05/2010 “On administrative contraventions”.
- The entry into effect of the law no 119/2014 “On the right to information” does not precede the establishment of a specific structure which would efficiently implement this new law. Under these circumstances, the Office of the Commissioner has encountered difficulties in recruiting the employees due to the implementation of the law no 152/2013 “On civil servant” as amended, as well as for the specific nature of the right to information. At the very beginning of the implementation of the law, the Office received a flow of complaints, communications, various questions for assistance, while presiding over no staff resources at all.;
- The premises where the Office of the Commissioner is conducting the activity do not provide for the public assess or conducting further public or private activities, being held within the same building and being far from the nature and activity of this office. He same evaluation comes from the Mission of Experts in the recommendations made.

### **III. PROTECTION OF PERSONAL DATA**

#### **III.1 Identification of controlling and processing authorities**

A priority in the activity of the Commissioner even this year was the commitment regarding a complete identification of the controlling and processing entities, their awareness and acquaintance with the law no 9887, dated 10/03/2008 “On the protection of personal data”, as

amended, as well as the implementation of the legal obligation to inform the Office of the Commissioner about the situation of processing the personal data.

The awareness process of the controlling entities continued by way of sending information letters, whereof we require these entities to abide by the legal obligation to make notifications, as well as in various seminars organised to this effect. The controlling entities have been assisted regarding the way of filling out the Notification Form, as well as any other pertinent lack of clarity.

In the course of 2014, **802** entities have been filtered and recorded out of the entities list registered at the National Registration Centre, them being sent awareness letters, while we have sent round **600** awareness e-mails, making use of the electronic accounts of the controlling entities, which have been registered with the National Labour Service.

Owing to the policy and strategy to assist and help the controlling entities making notifications, a telephone communication was affected amounting to round **1000** phone calls, where various controllers have called our offices for clarifications and assistance. Round **300** controlling entities have been received and assisted at the premises of our offices. At the same time, awareness activities in the field have been conducted with various controllers who have been acquainted with the law, their obligation to make notifications, while assistance has been provided to the effect of filling out the notification form.

### **III.1.1 Notification and Registration of Controlling Entities**

As a consequence of awareness strategy, but also due to the binding effect of the law, **728** controlling entities have sent notifications to the Office of the Commissioner. The total number of processing notifications by the controllers in the territory of the Republic of Albania until later 2014 amounted to **4707**. Compared to the previous year, this year a surplus of **146** declarations has been made.

We have continued with the online registration and publication in the Register accessible by the Public for the notifications amounting to processing the personal data in conformity with the requirements of Articles 5 and 6 of the Law no 9887, dated 10/03/2008 “On protection of personal data”, as amended. The number of controlling entities registered for this period is **802**, thus bringing the number of entities registered with the Central Register of Controlling entities up to **4665**. Compared to the previous year, this year was a surplus of **135** registrations.

Based on Article 23 of the Law no 9887, dated 10/03/2008 “On the protection of personal data”, as amended, we have processed, based on the request for additional information, **112** declarations turning out to be incomplete or ambiguous, as well as for further checking out the legality of processing the data by the declaring controller, this also in the context of submitting the request for authorisation of the Commissioner to process sensitive data and the international transfer of the personal data.

At the same time, originating from the examination of the notification forms, two verification cases were instituted to the effect of verifying the legality of international transfer of data, the consequence of which was the provision of further information by the controllers, as well as the initiation by them for the procedures for obtaining the Authorisation of the Commissioner for the international transfer of the data to countries without a sufficient level of personal data protection. Rectifications, additional data or provision of authorisations has been reflected in the Electronic Register of the Controlling Entities.

Despite the difficulties in finding out the accurate addresses, efforts were focused this year to make the comprehensive verification and awareness of the entire controlling entities having the legal status of “*Representation Offices*”, which are legally bound to make a notification.

### **III.1.2 Administration of Communication Channel**

We have maintained continuous contacts with the liaison persons tasked with the protection of personal data with these Controllers, mainly the public ones, to the effect of an expedited information regarding the act issued by the Commissioner and for any necessary communication or assistance. The main role in this reporting period aimed mainly at the awareness of this category about the obligations which should be met by each controller in compliance with the Instruction no 21 of the Commissioner “*On determining the rules for preserving the security of personal data being processed by the big processing entities*”.

#### Others

One of the tasks set out in the resolution of the Assembly on the evaluation of the activity of the Office of Commissioner for 2013 was the full identification of the controlling and processing entities and their registration in the register of the controlling entities. In November, in response to our request, NRC made available the updated list of controlling entities operating in the Republic of Albania. This information was necessary to affect detailed filtering of entities being bound to make notification, those having abided by this obligation and those not continuing with the performance of their activity. Upon receiving this information, work started for identifying the controllers and categorising them according to the field of activity, to the effect of making them aware of their legal obligation to make notifications and make the registration at the register of the controlling entity. At the same time, we have asked for the cooperation with the Ministry of Justice, since this controller takes care for the functioning and organisation of the free legal professions such as advocacy, notary, mediation, private judicial enforcement, legal aid for informing these controllers about the observation of their legal obligation to make notifications.

### **III.2.1 Administrative investigations in the field and online**

#### **Administrative controls**

In the course of 2014, the Office of the Commissioner carried out administrative controls within the general scope of “*Implementation of the Law no 9887, dated 10/03/2008 “On protection of Personal Data”*”, as amended, as well as of the acts approved by the Commissioner by the controller.

The implementation of these controls is the continuous commitment of the Office of the Commissioner and it is done to the effect of performing the tasks of supervision and monitoring the observation of the rules connected to the protection of privacy and fair and legal processing of the personal data by the public and private controllers.

In this context 67 administrative controls have been carried out surrounding this general scope.

#### *Some fields where the sector related control was carried out by the Office of Commissioner*

During October – November 2014, administrative control was carried out with all the insurance companies. The security companies collect, process and preserve, the course of their activity, a considerable number of personal data, as well as sensitive data for various data entities, specifically for the category ‘client’, thus increasing the risk scale in connection with the protection of personal data. The purpose of these controls was the monitoring and supervision in order to establish whether the insurance market acted in a safe environment, in the context of guaranteeing the protection of the rights of data entities. The outcome of the controls being carried out was the verification of the violation of legal provisions for the protection of personal data, mainly surrounding the obligation for informing the data entities and relations with third parties regarding privacy.

With regard to a couple of Ministries, being in their respective activity, i.e., in their specific fields as providers of public services, considered controllers of personal data processing a considerable category of personal data, along with their dependant institutions, a control was carried out with a general scope. Worth mentioning out of these controls is the one carried out with the Ministry of Education and Sport (MES), where the verification of the implementation of the order of the Commissioner connected to the “*Questionnaire on the health situation of the pupils*” and “*Individual card of the pupil*” was made. These questionnaires were distributed by MAS to be filled out among the Educational Regional Directorates and District Centres in the context of implementing the order for “*Filling out the didactic items in the objects of physical-sports education in the pre-university education system*”, of this Ministry. Referring to their contents, whereof personal and sensitive data of minor persons (pupils) were collected, the latter enjoying special protection by law, breaches of the provisions of the law on the personal data protection were found out.

With regard to this, the Commissioner ordered the call-back of these questionnaires and suspension of the process of processing and collecting the data until the principles of the law were reflected correctly. The controller reacted by calling back the questionnaires and currently the process is under a monitoring phase, regarding the reflection of changes to their contents.

## Administrative inspections

CRIPPD has carried out inspections in the field and online inspections: the online inspections focused on the processing of the personal data in the website of the controllers, policies of privacy, information of the entities of personal data, ways of obtaining the consent of the personal data entities, publication of personal data, preserving and archiving the data being collected from the internet site of the controller.

Owing to the technological developments, a considerable part of the services by the public and private controllers is provided online. The conduct of online inspections was considered as a way for boosting awareness of controllers on the importance of the rules connected to the privacy, their obligation to inform the entities of personal data on their rights in accordance with the law for the protection of personal data. In this context, it is necessary that the controller, shall, inter alia, publish in its internet site '*the policies privacy*' (package of rules), to the effect of informing the entities of the personal data visiting the site on the ways of processing the data, security measures, and preserving the confidentiality, their rights and obligations of the controllers. Simultaneously, it was considered as an opportunity to enhance the awareness of the entities of the personal data and the persons visiting the site on the importance of protecting the privacy and rights they enjoy in this respect.

The Office of the Commissioner conducted **53** online inspections, in the internet sites of the controllers and for all these controllers a recommendation was sent initially. This was made to the effect of creating the legal space for the controllers to recover the violations and guarantee that their activity is conducted in compliance with the principles of the law and acts issued for its implementation. Regarding these recommendations, the online verification was made to check out their implementation and it emerged that **15** controllers did not reflect the recommendation and for **3** of them an administrative sanction of penalty was imposed.

At the same time, administrative inspections in the field were carried out referring to complaints, to the verification of meeting the recommendations and orders of the Commissioner, as well as the verification of meeting the obligations set by law. The total number of these verifications in the field was **37**, whereof **27** was the scope of verification of the recommendations/orders of the Commissioner. **90** administrative inspections emerge in total, whereof **80** administrative inspections on the verification of meeting the recommendations/orders of the Commissioner.

### III.2.2 Processing the complaints

In the course of 2014, 73 complaints and request for information concerning the protection of personal data were submitted with the CRIPPD by various controllers. Some of these complaints turned out not to be in compliance with the law on the protection of personal data while for 36 complaints, all the arrangements were made to guide the entities towards the assumptions of the

rights set out by law and in each single case, referring to the concrete specific features, the inspection orders were issued and the appropriate verifications in the field were made.

In compliance with the scope of these complaints, their contents and further consideration, it emerged that the concerns of these entities of data mainly pertained to:

- publication of personal data in media and in the official website of controllers;
- obtaining the consent for doing the direct marketing;
- assuming the right to access and rectification/deletion of the personal data;
- publication of personal data in judicial decisions, etc.

The complaints may be sent to the Office of the Commissioner, in addition to the official channel, also through the electronic post of the institution [www.info@idp.al](mailto:www.info@idp.al) or green number. This has facilitated a fast and direct communication. The e-mails have, while further processing them, always been administered officially.

In the process of dealing with the complaints, attention has been paid to effectively examine and provide the appropriate assistance to the data entities, orienting them on the ways and actions to be carried out in order to assume the rights recognised by law. At the same time, the intention was for the investigation to be comprehensive and effective, consisting in proportional decision-making and based on the reaction of the controllers and public interest.

### **III.2.3 Administrative sanctions during 2014**

In the course of this year, the Office of Commissioner issued **11** decisions on various controllers corresponding to **19** administrative sanction of **penalty**. Assuming the legal powers and following the conduct of controls and administrative inspections, penalties for controllers have been imposed, being apprehended in violation of the law. The administrative sanction of penalty for those controllers came as a result of the graveness of the violations found out during the control/inspection, the fact that these controllers in some cases were recidivists in terms of not abiding by the obligations imposed by the law and some others as a consequence of assuming the inspection to the effect of verifying the implementation of the recommendations of the office of the Commissioner, whereby the failure of performance was found out.

The violations whereof a penalty was imposed referred to the failure of controllers to observe the obligation to inform the entity of the personal data, the obligation in connection with the taking of measures for the personal data security and confidentiality, the obligations to provide for clauses, and rules for the protection of personal data in contractual agreements with third parties and the obligation pertaining to the complementing and updating the 'notification form' at the Office of Commissioner. The imposition of the administrative sanctions was done by the Office of the Commissioner in reliance with the law and abiding by the principles of legitimacy,

transparency in decision-making and rights of parties to be heard. Hearings have been held with the controlling entities in all the cases prior to making the final decision.

### **III.2.4 Following up judicial proceedings and enforcement of the decision by enforcement service**

#### ***Judicial proceedings***

It has been proceeded with following up judicial proceedings in **3** instances which are being dealt with further to 2013. In 2 cases thereof are being dealt with by the Administrative Appeal Court Tirana, upon the entry into effect of the Law no 49/2012 “*On the organisation and functioning of the administrative courts and adjudication of administrative disputes*”, while regarding the ***other judicial case***, recourse has been filed with the High Court. The necessary measures have been taken for the representation before the court within the legal time period in the respective cases. **3** judicial proceedings were followed up upon the request “issue of enforcement order” concerning the decisions imposing the administrative sanction of penalty, which were not enforced voluntarily by the controlling entities. 6 judicial proceedings turn out to have been followed during 2014 in total.

#### ***Enforcement of decisions***

It has been proceeded with putting the ***decisions of the office of the Commissioner*** imposing penalties to enforcement. The arrangements have been made in the course of this year to make a total establishment of the entire situation regarding the foreclosures for the decisions imposing penalties, all along the entire period of the activity of the Office of the Commissioner.

The establishment of the entire enforcement cases has been made to this effect; contact has been established with the representatives of the enforcement service, wherewith the Office of Commissioner has entered into service contracts for enforcing the decisions imposing penalties, while meetings have been arranged in the premises of the Commissioner with these representatives. Contact has been taken with the controlling entities, having not met voluntarily the obligation to pay the amount in accordance with the decision of the Commissioner imposing the penalty. With regard to the entities falling short of demonstrating any will for performing he obligation voluntarily, the requests have been prepared, i.e., in **3** such cases, for the issue of the enforcement order before the court (*decisions having been rendered prior to 2014*), while the respective judicial proceedings have been followed up.

In terms of statistics, the situation of the compulsory execution of the decisions imposing penalties ***prior to 2014*** turns up as follows: The Office of the Commissioner has imposed a total of **57** administrative sanctions of penalty, whereof **3** decisions have been contested and the judicial proceedings shall be followed up, while **2** decisions have been revoked.

With regard to the above, the decisions being put to compulsory enforcement to the enforcement offices are **52**, thus corresponding to the administrative sanctions of penalty, whereof 30 have been enforced by the enforcement service until 2013.

In 2014, since the Office of Commissioner returned its attention to the enforcement of the delayed decisions, the enforcement of **22** decisions was put in motion, which had remained unenforced. It was managed to enforce **16** decisions and under the process of compulsory enforcement are **6** other decisions. Regarding the decisions under the administrative sanction of penalty, being imposed during 2014, they are **11** decisions corresponding to **19** administrative sanctions of penalty.

The Office of the Commissioner has, regarding 2014 and prior to imposing the administrative sanctions, contacted the controllers for the purposes of voluntary enforcing of the penalty and it emerged that **4** controllers enforced it voluntarily, thus corresponding to **8** administrative sanctions. While **2** controllers filed a complaint against the decision before court and **5** controllers did not respond to enforcing the decisions voluntarily and the Office of Commissioner will continue to take the measures concerning the further conduct following the expiry of the legal period of complaint and transformation into executive title, to the effect of affecting the compulsory enforcement through the enforcement offices.

#### **Collected amounts (in monetary value) to the state budget out of the proceeds of penalties being imposed:**

- ✓ Collected amount to the state budget out of the administrative sanctions of penalty, **prior to 2014**, turns out to be **103.400 ALL**.
- ✓  Collected amount to the state budget out of the administrative sanctions of penalty, **for 2014**, turns out to be **677.902 ALL**.

### **III.3 Activities on privacy**

#### **28 January, European Day of Personal Data Protection**

On the occasion of the European Day of Privacy, the Office of the Commissioner organised the conference with the topic: “Protection of personal data, fundamental human right”.

Concurrently with the conference, within the premises of the authority the “Open Day” was conducted. Representatives of the Office were available to the individuals to discuss and share with them various issues concerning the privacy.

#### **Literary competition**

On 31 Jan, the assignment of prizes for the best literary composition was conducted within the premises of the School Dora d'Istria with the topic "*Protecting privacy*". Numerous pupils brought their literary compositions in Albanian, English and French, while a joint commission composed of teachers and representatives of the Office of Commissioner distributed the certificates for the best compositions.

■ ***Open lecture with the students of Mater level of New York University of Tirana***

In February, representatives of the Office of the Commissioner participated at an open hour with the students of the Master level of Law Faculty at New York University Tirana to discuss on the sensitive issues of protection of personal data.

■ ***Training seminar with the employees of the State Police Directorate General***

On 12 March, representatives of the Office of the Commissioner conducted a training seminar with employees of the State Police Directorate General regarding a summary of the law for the protection of personal data, however, mainly its amendments, novelties brought about by them and other important topics.

■ ***Awareness Seminar with representatives of the local administration of Korça and Pogradec towns***

In May, the Office of the Commissioner organised two seminars with representatives of the public administration in the town of Korça and Pogradec, to the effect of enhancing the awareness of the public actors regarding the protection of personal data and implementation of the respective legislation in Albania.

■ ***Activities with the pupils of the school Muharrem Çollaku in Pogradec***

In the meeting with the pupils of the secondary school "Muharrem Çollaku" in Pogradec, the representatives of the Office of the Commissioner provided advice regarding the protection against computer hackers which may affect the individual privacy, through safe passwords, use of antivirus or spyware usage.

■ ***Training with assigned persons***

CRIPPD has, in cooperation with the Albanian School of Public Administration (ASPA), continued with the continuous training of the persons tasked as public controllers, through the modules administered by them. Currently, 65 persons certified in this field have been identified.

■ ***Office of the Commissioner for the Right to Information and Protection of Personal Data, part of the 17<sup>th</sup> Book Fair "Tirana 2014"***

CRIPPD participated during 12 – 16 November at the 17<sup>th</sup> Book Fair “Tirana 2014”. Available to the public during this event were made awareness materials, such as booklets leaflets. It emerges that the pavilion was visited by 30 000 persons.

■ ***Seminar “On the implementation of the Obligatory Rules for Corporations in the francophone space”***

The Office of the Commissioner organised a seminar with representatives from the banking, telecommunication sector and the public authorities transferring data to the francophone countries. Invited to this seminar was the French expert, head of the sector for the international transfer at the French Authority, who submitted to the attendees the simplifying standards on the implementation of the obligatory rules for corporations in the international transfer, while providing practical examples

## **IV. LEGISLATIVE ACTIVITY**

### **IV.1 Approval of bylaw acts**

The most important developments occurring in the context of enriching the legislative activity were marked by way of drafting the bylaw acts, instructions or roadmaps, explaining the Law no 9887, dated 10/03/2008 “On the protection of personal data”. 4 Instructions were approved in the course of this year by the Commissioner and they were published in the Official Journal.

1. ***Instruction no 95, dated 07.04.2014 “On determining the institutions and bodies receiving personal data from the civil service, as well as the way, type and quantity of information they are about to obtain”***, drafted jointly by the Commissioner for the Right to Information and Protection of Personal Data and the Minister of Internal Affairs. This instruction determines the institutions having access to the civil status register, legal bases for this case, aim that the personal data are used for, their quantity and type.
2. ***Instruction no 40, dated 13.06.2014 “On the use of internet and official electronic post service by the public institutions in the context of protecting personal data”***. The purpose of this Instruction is determining obligatory rules for implementation by the public institutions and respective structures, administering the information systems in the course of using internet and electronic post by their employees in their work stations.
3. ***Instruction no 41, dated 13.06.2014 “On permitting some categories of international transfers of personal data to a state no having a sufficient level of data protection”***. The Instruction aims at determining obligatory rules for implementation by the public or private controllers in connection with the international transfer cases to countries not having a sufficient level of personal data protection.
4. ***Instruction no 42, dated 22.07.2014 “On processing the data of applicants for employment”***. The Instruction aims at setting out rules for processing the personal data in the course of the recruitment period for employees to the public institutions or public institutions.

In the context of illustrating the approved Instructions by concrete examples and to the effect of their facilitated implementation, “A summary of practical cases for the implementation of the instructions approved by the Commissioner” has been prepared, which has been posted in the internet site of the institution [www.idp.al](http://www.idp.al).

## IV.2 Approved instructions / roadmaps

1. Instruction “***Protection of personal data in the Code of Ethics***”. In compliance with the requirements imposed by the Resolution of the Assembly of the Republic of Albania “On the evaluation of the activity of the institution of the Commissioner for the protection of personal data for 2013” to induce the controllers to draft the codes of ethics and their evaluation, in reliance on the Article 31/gj of the Law no 9887, dated 10/03/2008, this document was approved, containing some important principles in connection with the protection of the personal data. Every controller should take into account to include them into the code of ethics.
2. “***Roadmap for the Public Authorities on the drafts/acts bearing a connection to the personal data, in the context of Article 31/1/a of the Law no 9887, dated 10/03/2008***”. This document will encourage the controllers having the legislative initiative to send drafts/legal and bylaw acts for feedback to the Commissioner prior to sending them to the Council of Ministers for Approval. The roadmap was published on the online site of KMDP and it was simultaneously sent even to the responsible officials of controllers, through the channel of communication.
3. “***Instruction for the protection of the personal data in the cloud computing.***”. Referring to the vigorous developments in technology, this necessary document specifies the general principles, being applicable for the controllers and processers of the data in cloud services, including the importance of setting out the purpose, deletion of data and technical and organisational measures. The instruction has been published on line in the website of CRIPPD and it is addressing the controllers through the channel of communication and it aims at being submitted in upcoming training sessions with this category of controllers.
4. “***Instruction on the International Transfer of the Personal Data***”. As a contemporary standard, it was drafted to assist the controllers and the entities of the data on clarifying the concepts and procedures to be applied in any single case regarding the international transfer of the personal data. The instruction was published online in the website of CRIPPD and it has been sent to the respectively assigned persons with various controllers.
5. CRIPPD Regulation was approved for preventing the conflict of interests in assuming the public functions, in compliance with the model regulation proposed by ILDKDKI and

published in the “Explanatory manual and training on the role of the responsible bodies in preventing the control and conflict of interests”.

6. In the context of approximation with international standards, the material on the term “*Consent*” was prepared, based on the Opinion of the Work Group of article 29 of the Directive 95/46 of CE. The respective interpretations assist the law enforcing institutions regarding the meaning and accurate use of this term, thus reflecting aspects on the way it should be applied and put in practice on case basis.
7. As an awareness medium which has been made use of in training sessions and recurrent contacts has been evaluated the preparation of leaflets. The leaflet “*Transparency in the public administration and protection of personal data*”, recommends the state institutions to develop internal policies regarding the requests for access to the official documents. While the leaflet “Law no 119/2014 “On the right to information”, the publication of which was supported by the Foundation Open Society for Albania, explains some of the rights and obligations of the new law for the right to information.

#### **IV.3 Feedback on the drafts / legal and bylaw acts.**

Abiding by the obligations imposed by the law for the protection of personal data for providing feedback on the drafts / legal acts, feedback has been provided for **10 draft laws**, *draft law “On some addenda and amendments to the Law no 8454, dated 04/02/1999 “On Ombudsman”, draft law “On asylum in the Republic of Albania”, draft law “On deposits insurance”, draft law “On the Internal Service and Control at the Ministry of Interior”, draft law “On weapons”, draft law “On private physical security”; proposals for amendments to the law no 9109, dated 17/07/2003 “On the legal profession in the Republic of Albania”; proposals for amendments to the law no 8951, dated 10/10/2002 “On the personal number of citizens”, draft law “Code of Administrative Procedures in the Republic of Albania”; draft law “On military police in the Armed Forces of the Republic of Albania”.*

Feedback has been provided for **19 drafts / bylaw acts** has been provided: *for the draft decision of the Council of Ministers “On the registration and identification of the insured persons by the mandatory health insurance”; “Draft agreement between the Council of Ministers of the Republic of Albania and the Government of the Republic of Kosovo for the mutual cooperation in the field of security”; draft decision of the Council of Ministers “On determining the format and way of collection and reporting the data by the public or private providers of the health care services”; “Convention of the Council of Europe on forging the medical products and similar crimes posing a threat”; draft decision “On the approval in principle of the Agreement between the Council of Ministers of the Republic of Albania and the Government of Slovak Republic on the cooperation to combat terrorism, organised crime and illegal trafficking of narcotics, psychotropic substances and precursors of drugs and other crimes etc.”.*

Compared to the previous year, a reduction of the number of the draft laws and draft bylaw acts coming for feedback to the Office of Commissioner is observed. The outcome of the verification with the Official Journal is that not all the normative acts dealing with personal data are being sent for feedback to the Office of the Commissioner. It would be useful for the activity of all the institutions proposing normative acts to have a consultation prior to the approval of the act.

At the same time, the Office of the Commissioner is currently identifying the international acts and resolutions to make possible their implementation in Albania through the ratification of conventions or transposition through bylaw acts.

#### **IV.4 Meeting the legal obligations**

Subjects of the law has been awarded priority in connection with the requests coming for legal opinions or legal assistance on the application of respective laws, the right to information and protection of the personal data. Among the most frequently topic for information was mainly the request for interpretations connected to the definitions of the normative acts, permitting the processing of the personal data, assuming the right of access, but also regarding the procedures to be followed in the course of sharing the personal data among the controllers, or among the various structures within the one and the same controller. These requests have been addressed by various sectors, public authorities, public and private controllers.

Specific attention has been paid to the requests for international transfers of personal data. Six practical files have been examined and 4 decisions have been made, while further opinions have been provided concerning the banking system in the context of the transfer of the personal data of the clients as a request for the implementation of FATKA law. The procedures of the international transfer have marked increasing developments in their examination, this being owing to the approval of a new instruction, but also of the roadmap, the latter orienting and simplifying the way to be followed by each controller in the cases of submitting a request for transfer. The applied standard is contemporary and implemented by the best international practices.

Implementing the Resolution of the Assembly for 201, the cooperation with the Ministry of Justice has started through the work group “Anonymising the personal data in judicial decisions being published in the official sites of the judicial system”.

At the same time, in the course of this year, the Commissioner authorised the Controller *Ministry of Defence* regarding its request to go ahead with the “*Processing of the biometric data and fingerprints for a certain category of the staff*”, through making the respective system functional. The main aim reflected in this request is the treatment of the classified information in connection with the national security at high level.

#### **IV.5 Reporting**

The Office of Commissioner for the Right to Information and Protection of Personal Data has, in the course of this year, maintained regular contact with the ministries, the latter reporting to meet the obligations of the country in the framework of European integration and beyond. CRIPPD reported to the Ministry of European Integration regarding the VI Meeting of the Sub-Committee on *Justice, Freedom and Security* EU – Albania; it has reported to the Ministry of Justice regarding the drafting of the contribution of the Albanian government on the Progress Report of European commission, as well as it has reported with regard to drafting the second Contribution of the Government of the Republic of Albania for the Progress Report 2014 of the European Commission for Albania for Chapter “Political Criterion” and Chapter 23 “Judiciary and Fundamental Rights”.

In the context of the upcoming of the Mission of Experts (Evaluation Mission of European Commission) “Peer Mission Review”, reporting has included any requested information or issue. The aim of the meetings was the verification in the field and the evaluation of the implementation of the main reforms in the context of the integration of Albania into European Union. 36 recommendations addressed to the Office of Commissioner have been established, which shall be considered and implemented by the respective institutions.

The Commissioner reported in October to the Assembly of Albania regarding the evaluations made in the EU Progress Report for 2014 for Albania and on the initiatives launched for the recommendations being made.

Reporting has occurred in November in the framework of drafting the National Strategy for development and Integration 2014 – 2020, in the section “**Human Rights**”. Falling under the scope of our institution mission have been identified the objectives which we strive to attain and the financial expenditure required for the implementation.

## **V. INSTITUTIONAL COOPERATION**

### **V.1 Cooperation Agreement**

Cooperation agreements have been signed up between the Commissioner for the Right to Information and Protection of Personal Data and:

1. New York University Tirana;
2. National Agency for Computer Security;
3. National Labour Service;
4. Order of Chemists of Albania;
5. Order of Doctors of Albania.

Bilateral meetings have been held, which have brought a real contribution to the improvement of cooperation practices between CRIPPD and the other Public Authorities. Further cooperation agreements are under signing procedure, being of reciprocal interest in the organisation and conducting the joint activities.

### ***Participation of the Office of Commissioner in the meeting with the Prosecution Office General***

In October, CRIPPD participated at a meeting with the Prosecution Office General focusing on performing the tasks set out by the “Instruction on 5 priorities for the European Commission” addressed to the Prosecution Office, in the context of providing access to the data bases of the public registers, as an element directly connected to the effectiveness of pursuing the criminal prosecution. This meeting was organised upon the request of the Prosecution Office General in the context of the memorandum of cooperation among the institutions. In the meeting between the two Independent Authorities, it was agreed to continuously supervise the activity of institutions which are to grant access for the Prosecution Office regarding the documentation, security measures, making the preliminary notice for data processing etc.

### ***Commissioner meets with the Secretaries General of the Ministries***

The Commissioner held a meeting, which was coordinated by the Secretary General of the Council of Ministers, with the Secretaries General of the Ministries. The primary purpose in this meeting was the presentation of the need for the implementation of the legislation for the protection of personal data in drafting the acts, this being an obligation stemming from letter a) of Article 31 of the Law no 9887, dated 10/03/2008 “On the protection of personal data”. Introduced in this activity was the Roadmap “*On the public authorities on the draft-acts bearing a connection with the personal data*”.

### ***Meeting for the coordination of the activity of the Office of the Commissioner and Inspector General of the declaration and Controlling the Properties and Conflict of Interests***

In October the Commissioner and the Inspector General of the High Inspectorate of the Declaration and Conflict of Properties and Conflict of Interests conducted a working meeting to discuss on the coordination and cooperation between two institutions in the context of meeting the legal obligations through the exchange of experiences, where, inter alia, it was concluded for signing up to a cooperation agreement.

## **V.2 International Agreements**

### ***Admission of organising CEEDPA in Albania***

In April, 16<sup>th</sup> Meeting of the Authorities for the Data Protection in Central and Eastern Europe was organised in Skopje in Macedonia (CEEDPA). The conference aimed at exchanging the experiences, discussions, opinions and views for further improvement in the field of personal

data, attempting the unification of the working practices. The motivated requests of Bosnia-Herzegovina, Hungary and of our country were discussed in the conference for being one of the hosts of the upcoming meetings. The participants evaluated and admitted the request of the Albanian Authority, as the next organised of this important activity, which is due to the held on 29 – 30 April 2015.

### ***Cooperation with TAIEX***

The staff of the Commissioner continued with its training with some counterpart Authorities sponsored by TAIEX instrument. These training sessions were in the context of enhancing professionalism, mainly regarding legislation for the public registers, notification of violations of privacy, as well as the role of the data protection officers.

### ***Accession to GPEN***

In March we acceded the world cooperation network of the Authorities for the Protection of Data and Privacy (Global Privacy Enforcement Network, GPEN). The authorities have the possibility to exchange various experiences for issues and problems of law enforcement for the protection of personal data.

### ***International work group “On digital education”***

The Office of Commissioner for the Right to Information and Protection of Personal Data is part of the international work group “On digital education”. CRIPPD is member of this group by contributing, inter alia, even in drafting a document on the methodology of making children aware on the right of privacy protection.

### ***Regional conference “Freedom of public information – development of practices for the western Balkans region”***

On 18 Sept, we were represented at the Regional Conference “Freedom of public information – Development of practices in the Western Balkans region”, being organised by the Office for Public Communication of the Government of Kosovo in cooperation with the OSCE Mission Office in Kosovo. The institutional efforts, as well as the best practices for the protection of personal data in Albania were introduced in this conference.

### ***36<sup>th</sup> Conference of the Commissioners for the Protection of Data and Privacy***

36<sup>th</sup> Conference of the commissioners for the protection of data and privacy was conducted on 13 – 16 Oct. The Office of the Commissioner attended the conference session reserved just for its members, as well as the open two-day session, reserved for the controllers and the broad public. In the course of the closed session, the following documents were discussed and approved:

- Declaration of Moris regarding “Internet of Things”;
- Resolution on awarding the membership of the Authorities of the State of Bremen, Ghana and Senegal, with the status of observer: Bermudan, Japan, State of Mexico, Singapore and Commission of Future Trade of United States;
- Resolution on Big Data;
- Resolution on the implementation of cooperation;
- Resolution in connection with the Privacy and digital area.

**Commissioner on the right to information and protection of personal data participates at the European forum of Data Governance**

The European forum of Data Governance “Privacy, innovation and supervision: What ethical framework is required for Europe?” was conducted in Paris in December. This forum was organised by the French authority CNIL with the attendance of the Premier of France and it brought together 28 European Authorities (EU Member States), members of the Work Group of Article 29, while a specific invitation was addressed to the Commissioner for the Right to Information and Protection of Personal Data in Albania.

The Work Group of Article 29 approved the “Joint declaration of European Authorities for the protection of data of WG29”. This declaration is of specific importance in the international relations, since it echoes the European values in connection with the protection of data and privacy, enhancing the public trust on the services of digital economy, digital education, transparency in processing the data, cross-border transfer of data etc.

**Office of Commissioner for the Right to Information and Protection of Personal Data participated at some important international events**

- Multi-perspective workshop on auditing the protection of data paying specific importance to the seals for the protection of data same as European Privacy Seal (EuroPriSe);
- 31<sup>st</sup> plenary meeting of the Consultative Committee of the Convention for the Protection of Individuals against the automatic processing personal data (T-PD);
- European Conference of the Commissioners for the Protection of the Data;
- Training of BRC francophone correspondents (*Binding Corporate Rules*);
- Inspection at the Albanian embassy in the United Kingdom (UK) as well as study visit to the Authority of the Office of Commissioners for Information in United Kingdom ICO;
- 26<sup>th</sup> workshop for the treatment of cases;
- “Ensuring the protection of the personal data while the cyberspace is being secured – Challenges and perspectives for the South-Eastern Europe”;
- Fifth annual international conference “Efforts of National and International Authorities for Protecting the Personal Data”;
- Workshop “Protection of the data in preventing and investigating into financial frauds (for corporations)”;
- Regional conference of the Authorities for the Protection of Data in Western Balkans;
- “Implementing the privacy: lessons drawn from the current implementation and perspectives of the future”;

- Bilateral meeting between the representative of CRIPPD and Secretariat of GIODO, in Krakov of Poland focusing on the organisation of the CEEDPA Conference in Albania;

## **VI. HUMAN RESOURCES AND FINANCIAL MANAGEMENT**

### **VI.1 Organisational structure**

Human resources are one of the most important assets, the adjustment and development of which to the changes of the new legislation provides the possibility of offer and promotion for the level of professional service. The structural improvements were under the focus of the policies of human resources to the effect of enhancing the efficiency of the activity of the work of the institution, thus strengthening the coordination and cooperation of efforts among the structures, their adjustment to the new tasks stemming from the strategic objectives of the institution and attaining the European standards.

The approval of the law no 119/2014 “On the right to information” provided for new powers for the Office of the Commissioner in the field of the right to information, while it changed the denomination of the Commissioner for the Right to Information and Personal Data Protection.

The Assembly approved by way of Decision no 106/2014, dated 18/12/2014 “the Structure, organogram and classification of the salaries for the Commissioner for the right to Information and personal Data Protection”, which is going to assume any power and legal obligation. The functioning and expectations shall yield results in 2015, regarding the further challenges of the office, awareness of all the represented categories, up to the establishment of an all-inclusive culture in information and data protection.

### **VI.2 Human Resources Management**

By way of the respective structure, the human resources have been supervised and managed, thus implementing the chances in the legislation for the civil service, abiding by its main principles, to the effect of reducing arbitrariness in the process of competition, selection of candidates being professionally qualified, based on in merit, transparency and accountability.

Evaluating the human capital and the professional skills of the staff in the performance of the tasks and strategic objectives, we have appreciated the knowledge, sharing international experiences for the unification or approximation of legislation, applying for and obtaining study visits with TAIEX funds.

The professional skills have been programmed and developed as well as the internal resources, through the continuous training sessions organised by the Albanian School of Public Administration (ASPA). Providing for seminars for a part of the staff as well as for the newly recruited staff (on probation period) was managed in the field of the public administration, referring to the changes of the civil service and procurement legislation.

One of the priorities and criteria of European integration for the reform in the public administration towards a good and democratic governance is the full enforcement of the judicial decisions, regarding the fired civil servants.

The Office of the Commissioner has fully abided by the obligations stemming from two final judicial decisions, reinstatement in the previous position and full indemnification of the financial obligations.

## **VI.2 Financial Management**

Another, equally evaluated, direction in the internal administration is the coverage of the financial activity of the Office of Commissioner and assuming full accountability for the procedures of drafting and administering the budget funds, by way of using them efficiently and effectively, abiding by the principles and rules of financial management, in compliance with the legislation for the state budget management.

The Office of the Commissioner has, in terms of planning and implementing the budget, relied on the indispensable financial needs, abiding by the obligations stemming from the organic laws whereon it carries out its activity.

Regarding the process of providing for the administrative budget of CRIPPD, the document of requests of *Medium-Term Budget Program* has been drafted and submitted, closely connected to the institutional objectives, highly evaluating the contribution of all the stakeholders in the process of approving the budget of 2015, specifically of the Assembly, for the logistic support, human and financial resources, this being the budget containing the highest figures since the creation and functioning of the activity, with an increase of round 50%. In reliance on the Law no 185, dated 28/12/2013 “On the 2014 budget” the budget program for the Office of the Commissioner “Planning, management, administration” was approved.

The approved budget at a program level for 2014 has been realised at the extent of **89%**. The detailed information is provided in the statement displayed hereunder. Failure to realise it at the extent of 11% came as a result of a shortfall in the fund of salaries and social insurance, as a consequence of creation of vacancies, changing the legislation at law and bylaw level for the civil service, unsuccessful procedures for the recruitment of the medium-level category, with the procedure of lateral transfers, being a difficult procedure to be implemented by the independent institutions, as well as expecting the change of structure, the implementation of which is underway.

The performance indicators of other budget expenditures, including investments, this year appeal at high levels, with a realisation at the extent of 99%, referring to the table.

### **Table of appropriations of the budget and its utilisation for 2014**

Transfers, changes and utilisation in thousand / ALL

Nr	Denomination	Plan	Structures against plan in %	Fact	Utilisation against plan in % .
1	Salaries	28.640	61	24.410	85 .
2	Social insurance	4.609	9.8	3.913	84
3	Other goods and services	12.231	26	12.214	99.8
4	Investments	1.000	2	998	99.8
5	Transfers of family budget	500	1	320	64
6	Fees	100	0.2	86	86
	<b>Total</b>	<b>47.080</b>	<b>100</b>	<b>41.941</b>	<b>89</b>

**Revenues of the institution**

For 2014, the revenues out of the CRIPPD activity emerge mainly out of:

1. The penalties and fines imposed in the events of violations of the legal obligations by the controllers, at the amount of 949 000 ALL, being totally paid out to the state budget;
2. Other created data, sponsorship from international events organisers, at the amount of 491 000 ALL, the unutilised part of which has been carried forward to 2015, at the amount of 73 000 ALL.

**VII. PRIORITIES FOR 2015**

The main objective for the institutional development of CRIPPD remains to be the improvement of the quality and effectiveness of the strict implementation of the law for the right to information and law for the protection of the personal data. In this framework, the priorities for 2015 are:

- ✓ Creation and strengthening the administrative capacities for supervising, monitoring, coordinating, investigating, up to the imposition of administrative sanctions;
- ✓ Strengthening the institutional capacities through the investments for the development of IT infrastructure and for the creation of an inter-action with the entire public institutions;
- ✓ Benefiting IPA projects, aiming at approximating and implementing the best standards in various topics in both respective laws;
- ✓ Improvement of the legal framework for the protection of the personal data in compliance with the EU directives and international standards;
- ✓ The creation of online national register for the coordinators appointed by public authorities.

At the same time, the cooperation and improvement of the inter-institutional relations aiming at establishing an all-inclusive culture for information and at the same time for the protection of privacy.

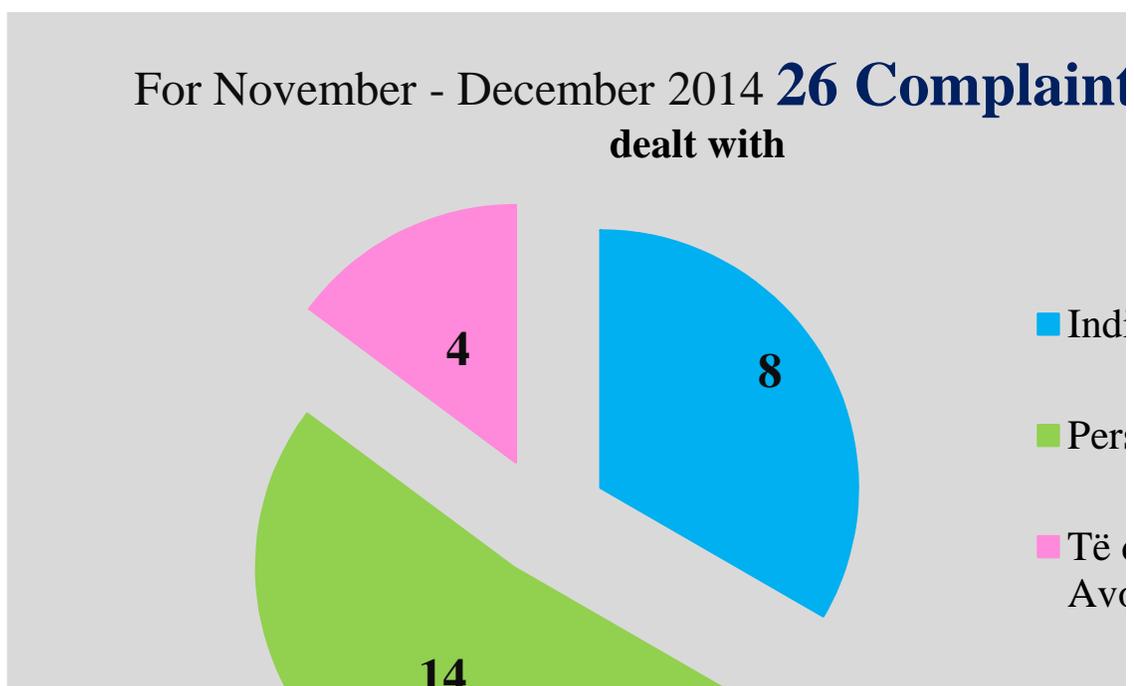
Cooperative initiatives shall be launched with the Media controller, as an important stakeholder in the publication of news, abiding by the protection of personal data, mainly for the sexually abused children.

- ✓ The objectives is to sign up to a cooperation agreement with the Authority of Audio-Visual Media to the effect of monitoring ethics in media, their awareness for the recognition and implementation of the respective laws.

It has been evaluated to launch an initiative for drafting a draft-law “On the organisation and functioning of independent institutions” to the effect of creating a unified system abiding by the autonomy, independence of the organisational structure and budget of the independent institutions in compliance with the findings and recommendations of the Mission of Experts of Evaluation of the European Commission “Peer Mission Review”.

## X. STATISTICS AND GRAPHS

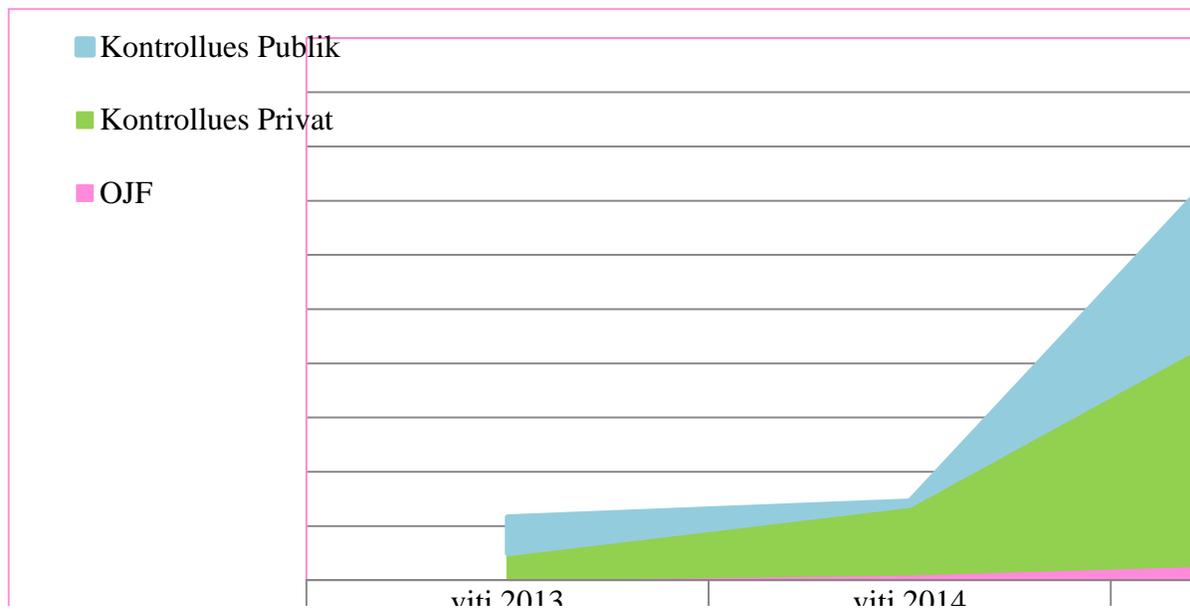
### ■ Right to information



**2 decisions** have been rendered, ruling submission of documents.

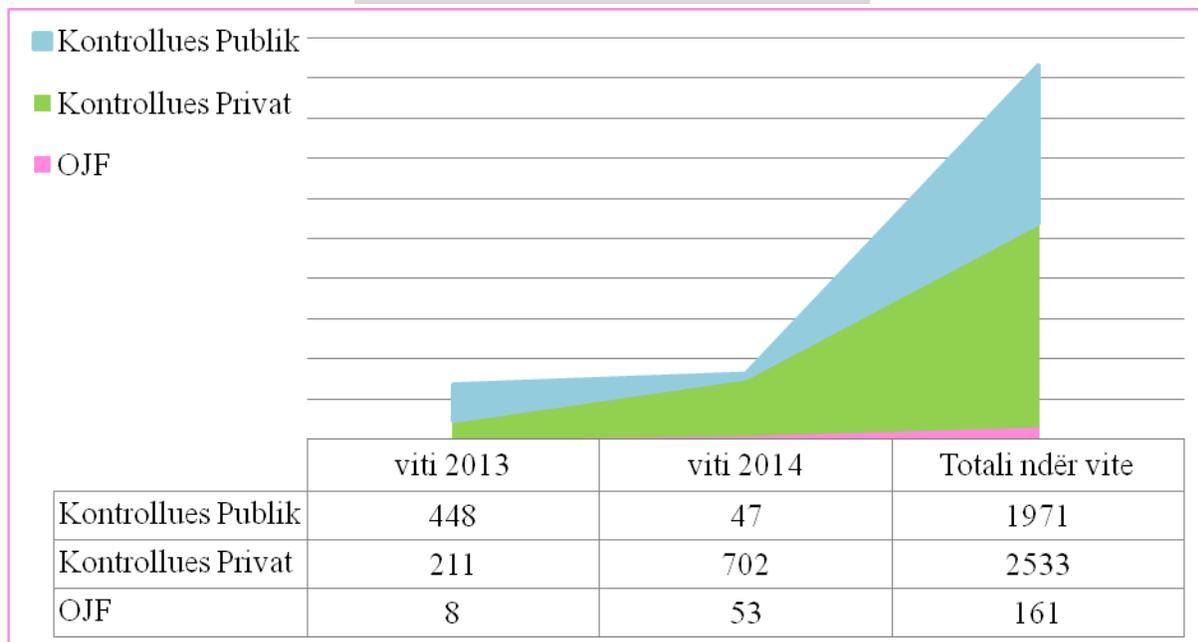
## Protection of personal data

### Notification forms



Total of forms of declared notifications **4707**

### Registered Forms

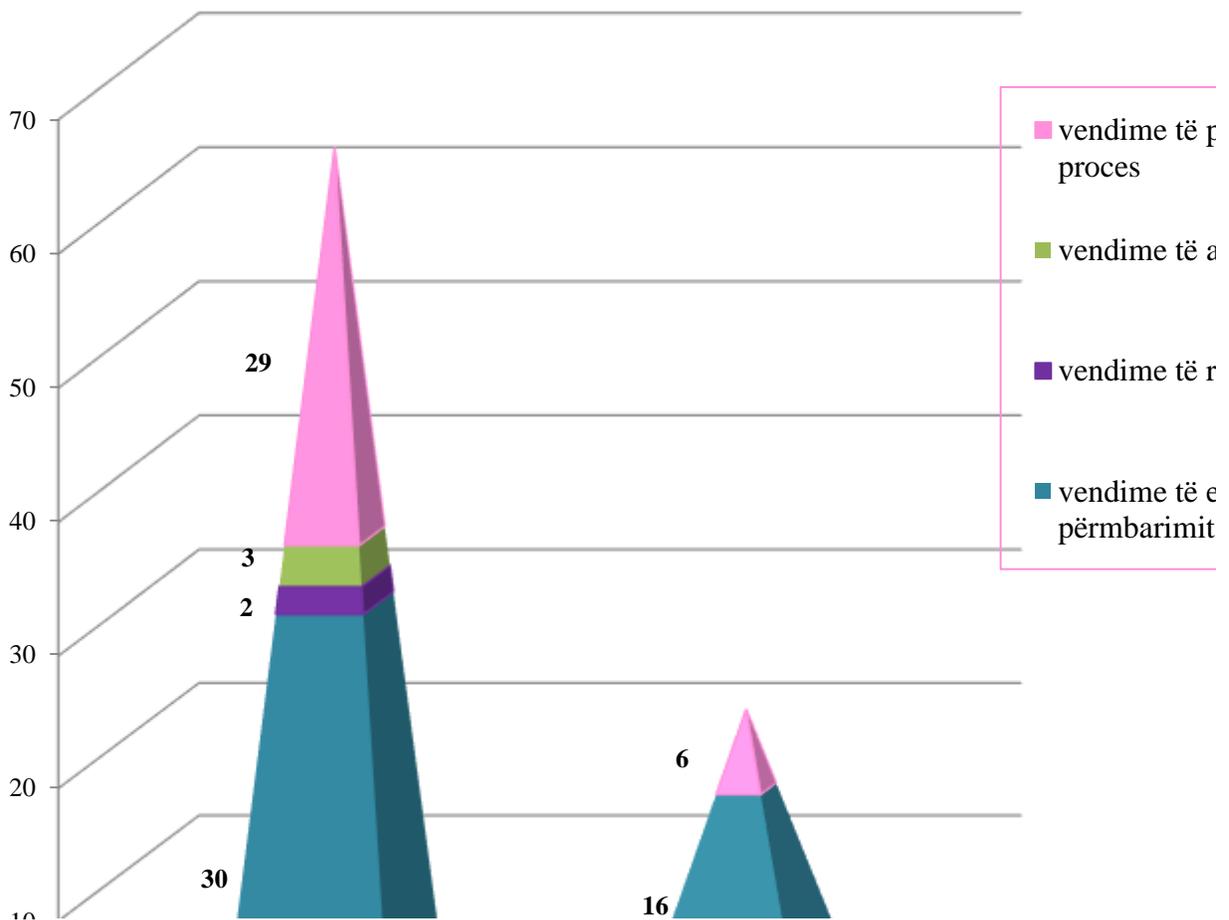


Total of forms of registered notifications **4665**

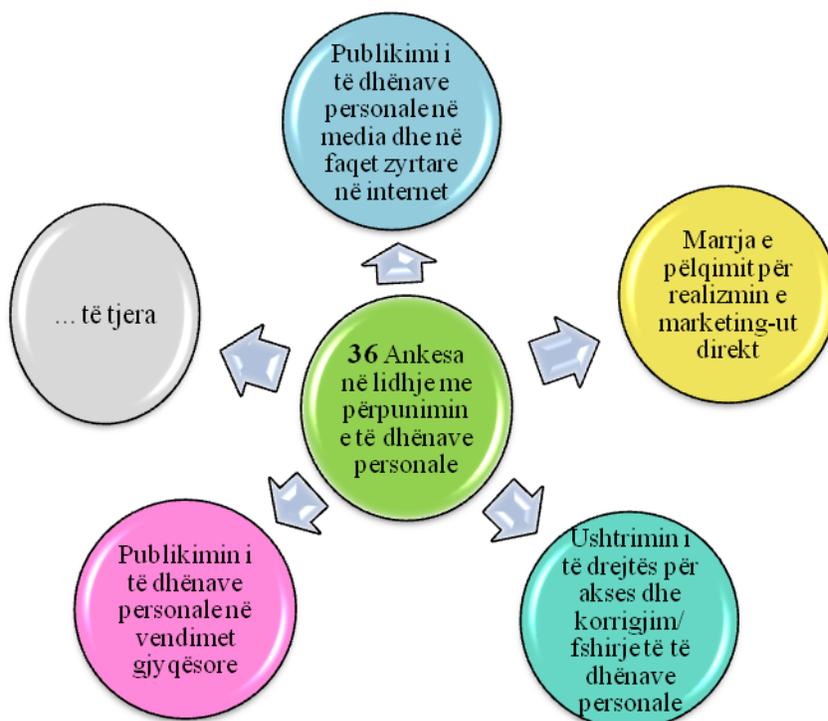
## Administrative sanctions and compulsory enforcement in accordance with the law for the protection of personal data



Period 2010-2013	Year 2014
57 decisions with the administrative sanction of penalty	22 decisions not enforced / carried forward
30 decisions enforced by enforcement offices	16 enforced decisions
2 quashed decisions	6 decisions under enforcement process
3 challenged decisions	



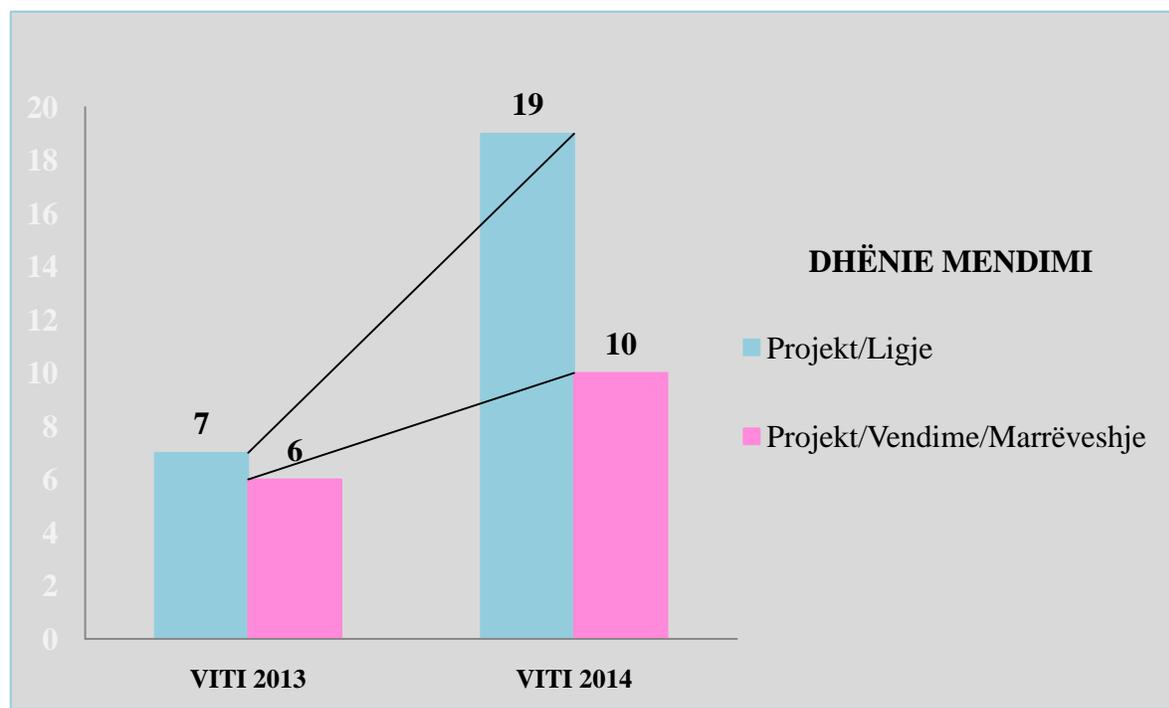
*For 2014 **73 complaints** were submitted regarding the processing of personal data, **36 of them** being administratively disposed of.*



Administrative investigation for 2014		
Controls	Inspections	Verification
<b>67</b> Administrative controls with general scope  Sector controls - Insurance companies - Public authorities	<b>37</b> inspection in the field - <b>27</b> having as a scope the verification of the implementation of recommendations / orders of Commissioner - <b>10</b> with another scope.	<b>53</b> <u>online</u> verification of recommendations/orders
	<b>53</b> online inspections	<b>27</b> verification of recommendation / order in the field
	<b>90</b> administrative inspections	
In total <b>157</b> administrative controls/inspections		In total <b>80</b> verifications

11 decisions (19 penalties)	Rendered during 2014
5 decisions	Enforced voluntarily
2 decisions	Challenged at court
4 decisions	Under enforcement process

### Legal Activity



**KUADRI LIGJOR  
PËR MBROJTJEN E TË DHËNAVE PERSONALE**

