

FDE #	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes
I	BASIC PROVISIONS	See FDE for details.	Functional	No Relationship	N/A	N/A	N/A	0	
II	PRINCIPLES	N/A	Functional	No Relationship	N/A	N/A	N/A	0	
II.5	Principles Relating to Protection	Personal data must be:	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	
II.5(1)	Principles Relating to Protection	processed lawfully, fairly and in a transparent manner in relation to the data subject ("lawfulness, fairness and transparency"); Lawful processing shall be the processing performed in compliance with this Law and/or other law regulating processing;	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	
II.5(2)	Principles Relating to Protection	collected for specified, explicit and legitimate purposes and cannot be further processed in a manner that is incompatible with those purposes ("limitation relating to the purposes of processing");	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	
II.5(3)	Principles Relating to Protection	adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ("data minimization");	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	
II.5(4)	Principles Relating to Protection	accurate and, where necessary, kept up to date. Taking into account the purposes for which it is processed, every reasonable measure must be taken to ensure that personal data that is inaccurate is erased or rectified without delay ("accuracy");	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	
II.5(5)	Principles Relating to Protection	kept in a form which permits identification of persons only within the time limit that is necessary for the purposes for which the personal data is processed to be realized ("storage limitation");	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	
II.5(6)	Principles Relating to Protection	processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing, as well as against accidental loss, destruction or damage, by using appropriate technical, organizational or staff-related measures ("integrity and confidentiality"). The controller shall be responsible for application of the provisions of paragraph 1 of this Article and must be able to demonstrate the application thereof ("accountability for actions").	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	
II.6	Processing for Other Purposes	By way of exception from Article 5, paragraph 1, item 2) of this Law, where further processing is carried out for the purposes of archiving in the public interest, for scientific or historical research purposes, as well as for statistical purposes, in compliance with this Law, it shall be considered that personal data is not processed in the manner which is incompatible with the original purpose. Where processing for a purpose which is other than the purpose for which data has been collected is not based on the law prescribing the necessary and proportionate measures in a democratic society with a view to safeguarding the objectives referred to in Article 40, paragraph 1 of this Law, or on the consent from the data subject, the controller shall be obliged to ascertain whether or not processing for such other purpose is in compatible with the purpose of processing for which data has been initially collected, in particular by taking into account: Provisions of paragraphs 1 and 2 of this Article shall not apply to processing performed by the competent authorities for the purposes of prevention, investigation and uncovering of criminal offences, prosecution of perpetrators of criminal offences or enforcement of criminal sanctions, including prevention and protection from threats to public and national security (hereinafter referred to as: for special purposes).	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	
II.6(1)	Processing for Other Purposes	whether there is a connection between the purpose for which data has been collected and another purpose of intended processing;	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
II.6(2)	Processing for Other Purposes	circumstances under which data has been collected, including the relationship between the controller and data subjects;	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
II.6(3)	Processing for Other Purposes	the nature of data, and in particular whether some special types of personal data referred to in Article 17 of this Law is being processed or not and/or whether or not the 8 personal data related to criminal convictions and punishable offences referred to in Article 19 of this Law is being processed;	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
II.6(4)	Processing for Other Purposes	the possible consequences of further processing for data subjects;	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
II.6(5)	Processing for Other Purposes	application of adequate safeguards, such as encryption or pseudonymisation.	Functional	Intersects With	Security of Personal Data (PD)	PRI-01.6	Mechanisms exist to ensure Personal Data (PD) is protected by logical and physical security safeguards that are sufficient and appropriately scoped to protect the confidentiality and integrity of the PD.	5	
II.6(5)	Processing for Other Purposes	application of adequate safeguards, such as encryption or pseudonymisation.	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
II.7	Processing for Other Purposes by Competent Authorities	Personal data collected by the competent authorities for special purposes cannot be processed for a purpose other than the purpose for which data has been collected, except where such further processing is prescribed by the law. Processing performed by the competent authorities for special purposes which are purposes other than those for which the personal data has been collected shall be permitted where the following conditions are aggregately met: Processing performed by the competent authorities for special purposes may cover archiving of personal data for the public interest, and/or its use for scientific, statistical or historical purposes, providing that adequate technical, organisational and staff-related measures are applied with the aim of protecting the rights and freedoms of data subjects.	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
II.7(1)	Processing for Other Purposes by Competent Authorities	the controller is authorized to process such personal data for such other purposes, in compliance with the law;	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	

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II.7(2)	Processing for Other Purposes by Competent Authorities	processing is necessary and proportionate to such other purpose, in compliance with the law.	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
II.8	Storage, Storage Periods and Review of the Need for Storage in Special Cases	By way of exception from Article 5, paragraph 1, item 5) of this Law, personal data processes exclusively for the purposes of archiving for the public interest, for the purposes of scientific or historical research, as well as for statistical purposes, can be stored for a longer period, while complying with the provisions of this Law on application of adequate technical, organisational and staff-related measures, all with the aim of protecting the rights and freedoms of data subjects. In the case of personal data processed by the competent authorities for special purposes, a time limit must be set for erasure of such data and/or a time limit for periodical evaluation of the need for its storage. Where the time limit referred to in paragraphs 1 and 2 of this Article is not determined by the law, it shall be determined by the data controller. The Commissioner shall supervise compliance with the time limits referred to in paragraphs 1 through 3 of this Article in compliance with their powers prescribed by this Law.	Functional	Intersects With	Security of Personal Data (PD)	PRI-01.6	Mechanisms exist to ensure Personal Data (PD) is protected by logical and physical security safeguards that are sufficient and appropriately scoped to protect the confidentiality and integrity of the PD.	5	
II.8	Storage, Storage Periods and Review of the Need for Storage in Special Cases	By way of exception from Article 5, paragraph 1, item 5) of this Law, personal data processes exclusively for the purposes of archiving for the public interest, for the purposes of scientific or historical research, as well as for statistical purposes, can be stored for a longer period, while complying with the provisions of this Law on application of adequate technical, organisational and staff-related measures, all with the aim of protecting the rights and freedoms of data subjects. In the case of personal data processed by the competent authorities for special purposes, a time limit must be set for erasure of such data and/or a time limit for periodical evaluation of the need for its storage. Where the time limit referred to in paragraphs 1 and 2 of this Article is not determined by the law, it shall be determined by the data controller. The Commissioner shall supervise compliance with the time limits referred to in paragraphs 1 through 3 of this Article in compliance with their powers prescribed by this Law.	Functional	Intersects With	Personal Data (PD) Retention & Disposal	PRI-05	Mechanisms exist to: (1) Retain Personal Data (PD), including metadata, for an organization-defined time period to fulfill the purpose(s) identified in the notice or as required by law; (2) Dispose of, destroys, erases, and/or anonymizes the PD, regardless of the method of storage; and (3) Use organization-defined techniques or methods to ensure secure deletion or destruction of PD (including originals, copies and archived records).	5	
II.9	Differentiating Individual Types of Data Subjects	Where it is a case of personal data processed by the competent authorities for special purposes, the competent authority shall be obliged to, on the occasion of processing thereof, if possible, make a clear distinction between data relating to individual types of persons on which data is being processed, such as:	Functional	No Relationship	N/A	N/A	N/A	0	
II.9(1)	Differentiating Individual Types of Data Subjects	the persons against whom there is reasonable suspicion that they have committed or that they intend to commit criminal offences;	Functional	No Relationship	N/A	N/A	N/A	0	
II.9(2)	Differentiating Individual Types of Data Subjects	the persons against whom there is reasonable suspicion that they have committed criminal offences;	Functional	No Relationship	N/A	N/A	N/A	0	
II.9(3)	Differentiating Individual Types of Data Subjects	the person who are convicted of criminal offences;	Functional	No Relationship	N/A	N/A	N/A	0	
II.9(4)	Differentiating Individual Types of Data Subjects	the persons injured by a criminal offence or the persons for whom it is presumed that they could be injured by a criminal offence;	Functional	No Relationship	N/A	N/A	N/A	0	
II.9(5)	Differentiating Individual Types of Data Subjects	other persons which are related to a criminal offence, such as the witnesses, persons that can provide information on a criminal offence, related persons or collaborators of the persons referred to items 1) through 3) of this Article.	Functional	No Relationship	N/A	N/A	N/A	0	
II.10	Differentiating Individual Types of Personal Data	Where it is a case of personal data processed by the competent authorities for special purposes, the competent authority shall be obliged to, to the degree to which it is possible, clearly separate the personal data which is based solely on the findings of facts from the personal data which is based on a personal assessment.	Functional	No Relationship	N/A	N/A	N/A	0	
II.11	Quality Assessment of Personal Data and Special Conditions for Processing Performed by the Competent Authorities for Special Purposes	The competent authorities which are processing personal data for special purposes shall be obliged to, by applying reasonable measures, ensure that any inaccurate, incomplete pieces of personal data and those which have not been updated is not transmitted and/or that it is not accessible. Accuracy, completeness and whether or not personal data is kept up to date shall be checked by the competent authorities, to the degree possible, prior to initiating the transfer and/or prior to making such data available. The competent authority which is transmitting personal data to another competent authority shall be obliged to, to the extent possible, additionally deliver information which is necessary for ascertaining the degree of accuracy, completeness, authenticity and/or reliability of personal data, as well as to deliver a notice on keeping of such data up to date. Where inaccurate personal data is transmitted and/or where personal data is transmitted unlawfully, the competent authority to which such data is transferred must be notified thereof without delay, and personal data transmitted must be rectified or erased, and/or its processing must be limited in compliance with this Law. Where special conditions are required by the law for processing, the competent authority which is transmitting personal data shall be obliged to inform the recipient of data of such special conditions, as well as of the obligation to comply therewith.	Functional	Intersects With	Personal Data (PD) Accuracy & Integrity	PRI-05.2	Mechanisms exist to ensure the accuracy and relevance of Personal Data (PD) throughout the information lifecycle by: (1) Keeping PD up-to-date; and (2) Remediating identified inaccuracies, as necessary.	5	
II.11	Quality Assessment of Personal Data and Special Conditions for Processing Performed by the Competent Authorities for Special Purposes	The competent authorities which are processing personal data for special purposes shall be obliged to, by applying reasonable measures, ensure that any inaccurate, incomplete pieces of personal data and those which have not been updated is not transmitted and/or that it is not accessible. Accuracy, completeness and whether or not personal data is kept up to date shall be checked by the competent authorities, to the degree possible, prior to initiating the transfer and/or prior to making such data available. The competent authority which is transmitting personal data to another competent authority shall be obliged to, to the extent possible, additionally deliver information which is necessary for ascertaining the degree of accuracy, completeness, authenticity and/or reliability of personal data, as well as to deliver a notice on keeping of such data up to date. Where inaccurate personal data is transmitted and/or where personal data is transmitted unlawfully, the competent authority to which such data is transferred must be notified thereof without delay, and personal data transmitted must be rectified or erased, and/or its processing must be limited in compliance with this Law. Where special conditions are required by the law for processing, the competent authority which is transmitting personal data shall be obliged to inform the recipient of data of such special conditions, as well as of the obligation to comply therewith.	Functional	Intersects With	Obligation To Inform Third-Parties	PRI-07.3	Mechanisms exist to inform applicable third-parties of any modification, deletion or other change that affects shared Personal Data (PD).	5	
II.12	Lawfulness of Processing	Processing shall be lawful only where one of the following conditions is met: Paragraph 1, item 6) of this Article shall not apply to the processing performed by a public authority within their scope of competence. Provisions of paragraphs 1 and 2 of this Article shall not apply to the processing performed by the competent authorities for special purposes.	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	
II.12	Lawfulness of Processing	Processing shall be lawful only where one of the following conditions is met: Paragraph 1, item 6) of this Article shall not apply to the processing performed by a public authority within their scope of competence. Provisions of paragraphs 1 and 2 of this Article shall not apply to the processing performed by the competent authorities for special purposes.	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
II.12(1)	Lawfulness of Processing	the data subject has consented to processing of their personal data for one or more specifically designated purposes;	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	

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II.12(2)	Lawfulness of Processing	processing is necessary for performance of a contract concluded with the data subject or for taking actions, at the request of the data subject, prior to conclusion of the contract;	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
II.12(3)	Lawfulness of Processing	processing is necessary with the aim to complying with the legal obligations of the controllers;	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
II.12(4)	Lawfulness of Processing	processing is necessary with the aim of protecting the vitally important interests of the data subjects or of another natural person;	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
II.12(5)	Lawfulness of Processing	processing is necessary with the aim of carrying out of tasks in the public interest or executing the legally prescribed powers of the controllers;	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
II.12(6)	Lawfulness of Processing	processing is necessary with the aim of realising the legitimate interests of the controllers or of a third party, except where the interests or the fundamental rights and freedoms of the data subject for which personal data processing is required prevail over such interests, and in particular where the data subject is an underage person.	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
II.13	Lawfulness of Processing Performed by the Competent Authorities for Special Purposes	Processing performed by the competent authorities for special purposes shall be lawful only where such processing is necessary for conducting the tasks of the competent authorities and where it is prescribed by the law. Such law shall at the minimum laid down the objectives of processing, personal data which is to be processed and the purposes of processing.	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
II.14	Lawfulness of Processing in Special Cases	The basis for processing referred to in Article 12, paragraph 1, items 3) and 5) of this Law shall be laid down by the law. Where it is a case of processing referred to in Article 12, paragraph 1, item 3) of this Law, the law shall additionally laid down the purpose of processing, and where it is a case of processing referred to in Article 12, paragraph 1, item 5) of this Law, the law shall laid down whether or not processing is necessary with the view to carrying out the tasks in the public interest or in the exercise of the legally prescribed authorities vested in the controllers. The law referred to in paragraph 1 of this Article shall prescribe the public interest which is intended to be realized, as well as the obligation to comply with the rules on proportionate processing to the objective intended to be achieved, and may additionally prescribe conditions governing permissibility of processing by the controllers, the types of data which is subject to processing, the data subjects concerned, the persons to which data can be disclosed and the purpose of disclosure thereof, limitations pertaining to the purpose of processing, the storage and keeping period, as well as other special actions and the procedure of processing, including the safeguards for lawful and fair processing.	Functional	Intersects With	Authority To Collect, Process, Store & Share Personal Data (PD)	PRI-04.1	Mechanisms exist to determine and document the legal authority that permits the organization to collect, receive, process, store, transmit, share, update and/or dispose Personal Data (PD), either generally or in support of a specific business process.	5	
II.15	Consent	Where processing is based on consent, the controller must be able to demonstrate that the person has consented to processing of their personal data. If the data subject's consent is given in the context of a written declaration which also concerns other matters, the request for the provision of consent must be presented in a manner which is clearly distinguishable from the other matters, in an intelligible and easily accessible form, using clear and plain language. Any part of such a declaration which is contrary to this Law shall not have any legal effect. The data subject shall have the right to withdraw their consent at any moment. The withdrawal of consent shall not affect the permissibility of processing which has been performed on the basis of the consent prior to withdrawal. Before providing consent, the data subject must be informed of the right to withdrawal, as well as of the effect of the withdrawal. Withdrawal of consent must be simple, just as it shall be simple to give the consent. When assessing whether consent for processing of personal data is freely given or not, utmost account shall be taken of whether or not the performance of contracts, including the provision of services, is conditional on giving consent that is not necessary for the performance of that contract.	Functional	Intersects With	Data Subject Consent	PRI-03	Mechanisms exist to enable data subjects to authorize the collection, receipt, processing, storage, transmission, sharing, updating and/or disposal of their Personal Data (PD), where the data subject is provided, prior to collection, with: (1) Plain language explaining the potential data privacy risks of the authorization; (2) A means to decline the authorization; and (3) Necessary choice and consent-related criteria required by applicable statutory, regulatory and contractual obligations.	5	
II.15	Consent	Where processing is based on consent, the controller must be able to demonstrate that the person has consented to processing of their personal data. If the data subject's consent is given in the context of a written declaration which also concerns other matters, the request for the provision of consent must be presented in a manner which is clearly distinguishable from the other matters, in an intelligible and easily accessible form, using clear and plain language. Any part of such a declaration which is contrary to this Law shall not have any legal effect. The data subject shall have the right to withdraw their consent at any moment. The withdrawal of consent shall not affect the permissibility of processing which has been performed on the basis of the consent prior to withdrawal. Before providing consent, the data subject must be informed of the right to withdrawal, as well as of the effect of the withdrawal. Withdrawal of consent must be simple, just as it shall be simple to give the consent. When assessing whether consent for processing of personal data is freely given or not, utmost account shall be taken of whether or not the performance of contracts, including the provision of services, is conditional on giving consent that is not necessary for the performance of that contract.	Functional	Intersects With	Documenting Data Processing Activities	PRI-14	Mechanisms exist to document Personal Data (PD) processing activities that covers collection, receiving, processing, storage, transmission, sharing, updating and/or disposal actions with sufficient detail to demonstrate conformity with applicable statutory, regulatory and contractual requirements.	5	
II.16	Consent of an Underage Person in relation to the Use of Information Society Services	An underage person who has turned 15 may independently provide consent to processing of their personal data in the use of information society services. In a case of an underage person who has not turned 15, the consent for processing of data referred to in paragraph 1 of this Article must be given by the parent exercising parental right and/or by another legal representative of the underage person. The controller must take reasonable measures with the aim of determining whether the consent has been provided by a parent exercising parental right and/or by another legal representative of the underage person, by taking into consideration available technologies.	Functional	Intersects With	Prohibition of Selling, Processing and/or Sharing Personal Data (PD)	PRI-03.3	Mechanisms exist to prevent the sale, processing and/or sharing of Personal Data (PD) when: (1) Instructed by the data subject; or (2) The data subject is a minor, where selling and/or sharing PD is legally prohibited.	5	
II.17	Processing of Special Types of Personal Data	Processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, as well as the processing of genetic data, biometric data for the purpose of uniquely identifying a person, data concerning health condition or data concerning sex life or sexual orientation of a natural person shall be prohibited. By way of exception, the processing referred to in paragraph 1 of this Article shall be permitted in the following cases: Provisions of paragraphs 1 and 2 of this Article shall not apply to processing performed by the competent authorities for special purposes.	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	

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II.17(1)	Processing of Special Types of Personal Data	the data subject has given their explicit consent to processing for one or more purposes of processing, except where the law prescribes that processing shall not be performed on the basis of a consent;	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
II.17(2)	Processing of Special Types of Personal Data	processing is necessary with the aim of carrying out the obligations or exercising legally prescribed authorizations of the controller or of the data subject in the field of labour, social insurance and social protection, if such processing is prescribed by the law or a collective agreement providing for appropriate safeguards for the fundamental rights, freedoms and the interests of the data subject;	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
II.17(3)	Processing of Special Types of Personal Data	processing is necessary with a view to protecting the vitally important interests of the data subject or of another natural person, where the data subject is physically or legally incapable of giving consent;	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
II.17(4)	Processing of Special Types of Personal Data	processing is carried out in the course of the registered economic activity and by applying appropriate safeguards by an endowment, foundation, association or any other not-for-profit organisation with a political, philosophical, religious or trade union aim and on condition that the processing relates solely to the members and/or to the former members of such organization or to persons who have regular contacts with it in connection with the purposes of the organization, as well as that the personal data is not disclosed outside that organisation without the consent of the data subjects;	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
II.17(5)	Processing of Special Types of Personal Data	processing relates to the personal data which has manifestly been made public by the data subject;	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
II.17(6)	Processing of Special Types of Personal Data	processing is necessary for the purpose of establishing, exercising or defending the legal claims or in the case where a court is acting in their judicial capacity;	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
II.17(7)	Processing of Special Types of Personal Data	processing is necessary for the purpose of realizing a substantial public interest, providing that such processing is proportionate to the aim pursued, by respecting the essence of the right to data protection and providing that application of suitable and specific measures to safeguard the fundamental rights and the interests of the data subject is provided for;	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
II.17(8)	Processing of Special Types of Personal Data	processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employees, medical diagnosis, the provision of health or social protection and/or the management of health or social care systems, on the basis of the law or pursuant to a contract with a health professional, providing that the processing is carried out by or under supervision of a medical worker or another person that is subject to the obligation of professional secrecy prescribed by the law or by the rules of profession;	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
II.17(9)	Processing of Special Types of Personal Data	processing is necessary for the purpose of achieving public interest in the area of public health, such as protection against serious cross-border threats to public health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of the law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject, in particular in respect of professional secrecy;	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
II.17(10)	Processing of Special Types of Personal Data	processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or for statistical purposes, in compliance with Article 92, paragraph 1 of this Law, providing that such processing is proportionate to the aims pursued, while respecting the essence of the right to personal data protection and providing that suitable and specific measures to safeguard the fundamental rights and the interests of the data subject is provided for;	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
II.18	Processing of Special Types of Personal Data Performed by the Competent Authorities for Special Purposes	Processing of personal data performed by the competent authorities for special purposes which is revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health condition or data concerning sex life or sexual orientation of a natural person shall be permitted only where it is necessary, with application of appropriate safeguards of the rights of data subjects, in one of the following cases:	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
II.18(1)	Processing of Special Types of Personal Data Performed by the Competent Authorities for Special Purposes	the competent authority is legally authorized to process special types of personal data;	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
II.18(2)	Processing of Special Types of Personal Data Performed by the Competent Authorities for Special Purposes	processing of the special types of personal data is necessary with a view to protecting the vitally important interests of the data subject or of another natural person;	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
II.18(3)	Processing of Special Types of Personal Data Performed by the Competent Authorities for Special Purposes	processing relates to special types of personal data which are manifestly made available to public by the data subject.	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
II.19	Processing Relating to Criminal Convictions and Punishable Acts	Processing of personal data relating to criminal convictions, punishable acts and safeguards can be carried out based on Article 12, paragraph 1 of this Law under supervision of a competent authority only or where processing is authorized by the law, with the application of appropriate special safeguards for the rights and freedoms of data subjects. The comprehensive records of criminal convictions shall be kept only by and under supervision of a competent authority.	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	

FDE #	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes
II.20	Processing Which Does Not Require Identification	If for the realisation of the purpose of processing, personal data does not or does no longer require the identification of a data subject by the controller, the controller shall not be obliged to keep, acquire or process additional information in order to identify the data subject for the sole purpose of complying with this Law. Where, in case referred to in paragraph 1 of this Article, the controller is able to demonstrate that they are not in a position to identify the data subject, it shall be obliged to inform the data subject accordingly, if possible. In the cases referred to in paragraphs 1 and 2 of this Article, provisions of Articles 26, paragraphs 1 through 4, Article 29, Article 30, paragraphs 1 through 5, Article 31, paragraphs 1 through 3, Article 33, paragraphs 1 and 2 and Article 36, paragraphs 1 through 4 of this Law shall not apply, except where the data subject, for the purpose of exercising their rights under those Articles, provides additional information enabling their identification. Provisions of paragraphs 2 and 3 of this Article shall not apply to processing carried out by the competent authorities for special purposes.	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
III	RIGHTS OF THE DATA SUBJECTS	N/A	Functional	No Relationship	N/A	N/A	N/A	0	
III.1	Transparency and Modalities for the Exercise of the Rights	N/A	Functional	No Relationship	N/A	N/A	N/A	0	
III.1.21	Transparent Information, Information and Methods for Exercising of the Rights of Data Subjects	The controller shall be obliged to take appropriate measures to provide complete information referred to in Articles 23 and 24 of this Law and/or information relating to exercise of the rights referred to in Article 26, Articles 29 through 31, Article 33, Articles 36 through 38 and Article 53 of this Law to the data subjects, in a concise, transparent, intelligible and easily accessible manner, using clear and plain language, in particular in case of a piece of information intended to an underage person. Such information shall be provided in writing or in some other form, including, where appropriate, in electronic form. When requested by the data subject, information can be provided orally, provided that the identity of the data subject has been undoubtedly established. The controller shall be obliged to provide assistance to the data subject in exercising of their rights under Article 26, Articles 29 through 31, Article 33 and Articles 36 through 38 of this Law. In the cases referred to in Article 20, paragraphs 2 and 3 of this Law, the controller may not refuse to act on the request of the data subject for exercising of their rights under Article 26, Articles 29 through 31, Article 33 and Articles 36 through 38 of this Law, unless where the controller has demonstrated that it is not possible for them to identify the data subject. The controller shall be obliged to provide information on action taken based on a request under Article 26, Articles 29 through 31, Article 33 and Articles 36 through 38 of this Law to the data subject without delay and within 30 days from the receipt of the request at the latest. That time limit can be extended by additional 60 days where necessary, taking into account the complexity and number of the requests. The controller shall be obliged to inform the data subject of any such extension of the time limit and of the reasons for such extension within 30 days from the receipt of the request. Where the data subject has submitted the request by electronic means, information must be provided by electronic means where possible, unless where the data subject has requested that information be provided by other means. If the controller does not take action on the request of the	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	
III.1.21(1)	Transparent Information, Information and Methods for Exercising of the Rights of Data Subjects	collect the necessary administrative costs of provision of information and/or taking action on the request;	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	
III.1.21(2)	Transparent Information, Information and Methods for Exercising of the Rights of Data Subjects	refuse to act on the request.	Functional	Intersects With	Justification To Reject Disclosure Requests	PRI-07.5	Mechanisms exist to document justifiable reasons for rejecting a data subject's access request for disclosure when the request is: (1) Harassing; (2) Repetitive; (3) Fraudulent; (4) Unjustified; and/or (5) Unlawful.	5	
III.1.22	Information and Modality for Exercising of the Rights of Data Subjects where Processing is Carried out by the Competent Authorities for Special Purposes	Where processing is carried out by the competent authorities for special purposes, the controller shall be obliged to take reasonable measures in order to provide to the data subject complete information referred to in Article 25 of this Law and/or information relating to exercising of the rights referred to in Articles 27, 28, 32, 34, 35, 39 and 53 of this Law, in a concise, intelligible and easily accessible manner, by using clear and plain language. Such information shall be provided in any manner appropriate, including by electronic means. As a rule, the controller shall provide information in the same form as that of the request of the data subject. The controller shall be obliged to provide assistance to the data subject in exercising of their rights referred to in Articles 27, 28, 32, 34, 35 and 39 of this Law. The controller shall be obliged to provide information on taking actions on their request without delay, in writing. The controller shall provide the information referred to in Article 25 of this Law and shall act in compliance with Articles 27, 28, 32, 34, 35, 39 and 53 of this Law free of any charge. Where the request of the data subject is manifestly unfounded or excessive, and in particular where the same request is frequently repeated, the competent authority may: The burden of demonstrating that the request is manifestly unfounded or excessive shall lie with the controller. Where the controller has reasonable doubts concerning the identity of the person submitting the request referred to in Article 27 or Article 32 of this Law, the controller may request the provision of additional information necessary to confirm the identity of the data subject.	Functional	Intersects With	Data Subject Feedback Management	PRI-06.4	Mechanisms exist to maintain a process to efficiently and effectively respond to requests, complaints, concerns and/or questions from authenticated data subjects about Personal Data (PD) the organization collects, receives, processes, stores, transmits, shares, updates and/or disposes.	5	
III.1.22(1)	Information and Modality for Exercising of the Rights of Data Subjects where Processing is Carried out by the Competent Authorities for Special Purposes	collect the necessary administrative costs of provision of information and/or taking action on the request;	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	
III.1.22(2)	Information and Modality for Exercising of the Rights of Data Subjects where Processing is Carried out by the Competent Authorities for Special Purposes	refuse to act on the request.	Functional	Intersects With	Justification To Reject Disclosure Requests	PRI-07.5	Mechanisms exist to document justifiable reasons for rejecting a data subject's access request for disclosure when the request is: (1) Harassing; (2) Repetitive; (3) Fraudulent; (4) Unjustified; and/or (5) Unlawful.	5	
III.2	Information and Access to Personal Data	N/A	Functional	No Relationship	N/A	N/A	N/A	0	

FDE #	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes
III.2.23-1	Information to be Provided where Personal Data is Collected from the Data Subject	Where personal data relating to a data subject is collected from the data subject, the controller shall be obliged, at the time when personal data is collected, to provide the data subject with the following information: Where the controller intends to further process the personal data for a purpose other than that for which the personal data was collected, the controller shall provide the data subject, prior to that further processing, with information on that other purpose as well as with any relevant further information as referred to in paragraph 2 of this Article. Where the data subject has already been informed of any of the pieces of information referred to in paragraphs 1 through 3 of this Article, the controller shall not be obliged to provide such information. Provisions of paragraphs 1 through 4 of this Article shall not apply to processing of data carried out by the competent authorities for special purposes.	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.23-1(1)	Information to be Provided where Personal Data is Collected from the Data Subject	on the identity and on the contact details of the controller as well as on the controller's representative, where he/she has been designated;	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.23-1(2)	Information to be Provided where Personal Data is Collected from the Data Subject	the contact details of the person tasked with personal data protection, where he/she has been designated;	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.23-1(3)	Information to be Provided where Personal Data is Collected from the Data Subject	on the purpose of intended processing and on the legal basis for the processing;	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.23-1(4)	Information to be Provided where Personal Data is Collected from the Data Subject	on the existence of a legitimate interest pursued by the controller or a third party, where the processing is carried out on the basis of Article 12, paragraph 1, item 6) of this Law;	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.23-1(5)	Information to be Provided where Personal Data is Collected from the Data Subject	on the recipient and/or on the group of recipients of the personal data, if any;	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.23-1(6)	Information to be Provided where Personal Data is Collected from the Data Subject	on the fact that the controller intends to transfer personal data to another country or to an international organization, as well as on whether or not such country or international organization is on the list referred to in Article 64, paragraph 7 of this Law, and in the case of a transfer referred to in Articles 65 and 67 or Article 69, paragraph 2 of this Law, on the reference or the appropriate safeguards, as well as on the means by which the data subject can get acquainted with such measures.	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.

FDE #	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes
III.2.23-2	Information to be Provided where Personal Data is Collected from the Data Subject	In addition to information referred to in paragraph 1 of this Article, the controller shall be obliged to, at the moment of collecting personal data, provide the following further information to the data subject, which may be necessary in order to ensure fair and transparent processing with regard to such data subject:	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.23-2(1)	Information to be Provided where Personal Data is Collected from the Data Subject	on the period for which the personal data will be stored, or if that is not possible, on the criteria used to determine that period;	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.23-2(2)	Information to be Provided where Personal Data is Collected from the Data Subject	on the existence of the right to request from the controller access to, rectification or erasure of their personal data and/or on the existence of the right to restriction of processing, the right to objection, as well as the right to data portability;	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.23-2(3)	Information to be Provided where Personal Data is Collected from the Data Subject	on the existence of the right to withdraw consent at any given time, as well as that the withdrawal shall not affect the permissibility of processing based on consent before its withdrawal, in cases where processing is carried out on the basis of Article 12, paragraph 1, item 1) or Article 17, paragraph 2, item 1) of this Law;	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.23-2(4)	Information to be Provided where Personal Data is Collected from the Data Subject	on the right to file a complaint with the Commissioner;	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.23-2(5)	Information to be Provided where Personal Data is Collected from the Data Subject	on whether the provision of personal data is a statutory or contractual obligation, or a requirement necessary to conclude a contract, as well as on whether or not the data subject is obliged to provide the personal data and of the possible consequences of failure to provide such data;	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.23-2(6)	Information to be Provided where Personal Data is Collected from the Data Subject	on the existence of automated decision-making, including profiling referred to in Article 38, paragraphs 1 and 4 of this Law, and, at least in those cases, meaningful information about the logic involved, as well as on the significance and the expected consequences of such processing for the data subject.	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.

FDE #	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes
III.2.24-1	Information to be Provided where Personal Data has not been Collected from the Data Subject	Where personal data has not been collected from the data subject, the controller shall be obliged to provide the data subject with the following information:	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.24-1(1)	Information to be Provided where Personal Data has not been Collected from the Data Subject	on the identity and on the contact details of the controller and of the controller's representative, where he/she has been designated;	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.24-1(2)	Information to be Provided where Personal Data has not been Collected from the Data Subject	on the contact details of the person tasked with the protection of personal data, where he/she has been designated;	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.24-1(3)	Information to be Provided where Personal Data has not been Collected from the Data Subject	on the purpose of the intended processing and on the legal basis for the processing;	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.24-1(4)	Information to be Provided where Personal Data has not been Collected from the Data Subject	on the type of data that is to be processed;	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.24-1(5)	Information to be Provided where Personal Data has not been Collected from the Data Subject	on the recipient, and/or on the group of recipients of the personal data, if any;	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.24-1(6)	Information to be Provided where Personal Data has not been Collected from the Data Subject	on the fact that the controller intends to transfer personal data to another country or to an international organization, as well as on whether or not such country and/or international organisation is on the list referred to in Article 64, paragraph 7 of this Law, and in the case of a transfer referred to in Articles 65 and 67 or Article 69, paragraph 2 of this Law, on the reference or the appropriate safeguards, as well as on the means by which the data subject can get acquainted with such measures.	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.

FDE #	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes
III.2.24-2	Information to be Provided where Personal Data has not been Collected from the Data Subject	In addition to information referred to in paragraph 1 of this Article, the controller shall be obliged to provide the following further information to the data subject, which may be necessary in order to ensure fair and transparent processing with regard to such data subject:	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.24-2(1)	Information to be Provided where Personal Data has not been Collected from the Data Subject	on the period for which the personal data will be stored, or if that is not possible, on the criteria used to determine that period;	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.24-2(2)	Information to be Provided where Personal Data has not been Collected from the Data Subject	on the existence of a legitimate interest of the controller or a third party, where processing is carried out on the basis of Article 12, paragraph 1, item 6) of this Law;	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.24-2(3)	Information to be Provided where Personal Data has not been Collected from the Data Subject	on the existence of the right to request from the controller access to, rectification or erasure of their personal data and/or on the existence of the right to restriction of processing, the right to objection to processing, as well as the right to data portability;	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.24-2(4)	Information to be Provided where Personal Data has not been Collected from the Data Subject	on the existence of the right to withdraw consent at any given time, as well as that the withdrawal of consent shall not affect the permissibility of processing based on consent before its withdrawal, in cases where processing is carried out on the basis of Article 12, paragraph 1, item 1) or Article 17, paragraph 2, item 1) of this Law;	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.24-2(5)	Information to be Provided where Personal Data has not been Collected from the Data Subject	on the right to file a complaint with the Commissioner;	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.24-2(6)	Information to be Provided where Personal Data has not been Collected from the Data Subject	on the source from which the personal data originates, and, where necessary, on whether data originates from the publicly available sources or not;	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.

FDE #	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes
III.2.24-2(7)	Information to be Provided where Personal Data has not been Collected from the Data Subject	on the existence of automated decision-making, including profiling referred to in Article 38, paragraphs 1 and 4 of this Law, and, at least in those cases, meaningful information about the logic involved, as well as on the significance and the expected consequences of such processing for the data subject.	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.24-3	Information to be Provided where Personal Data has not been Collected from the Data Subject	The controller shall be obliged to provide information referred to in paragraphs 1 and 2 of this Article: Where the controller intends to further process the personal data for a purpose other than that for which the personal data was collected, the controller shall be obliged to provide the data subject, prior to commencing such further processing, with information on that other purpose and with any relevant further information on such other purpose, as well as any other pieces of information of relevance as referred to in paragraph 2 of this Article.	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.24-3(1)	Information to be Provided where Personal Data has not been Collected from the Data Subject	within a reasonable time limit following collecting of the personal data, and within 30 days at the latest, having regard to all the specific circumstances of the processing;	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.24-3(2)	Information to be Provided where Personal Data has not been Collected from the Data Subject	at the latest on the occasion of establishing the first communication, where the personal data is used for communication with the data subject;	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.24-3(3)	Information to be Provided where Personal Data has not been Collected from the Data Subject	at the latest on the occasion when the personal data is first disclosed, where disclosure of personal data to another recipient is envisaged.	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.24-4	Information to be Provided where Personal Data has not been Collected from the Data Subject	The controller shall not be obliged to provide information referred to in paragraphs 1 through 4 of this Article to the data subject if: Provisions of paragraphs 1 through 5 of this Article shall not apply to processing of data carried out by the competent authorities for special purposes.	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.24-4(1)	Information to be Provided where Personal Data has not been Collected from the Data Subject	the data subject already has the information;	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.24-4(2)	Information to be Provided where Personal Data has not been Collected from the Data Subject	the provision of such information proves impossible or would require disproportionate consumption of time and means, in particular in the case of processing for archiving purposes in the public interest, scientific or historical research purposes, as well as for statistical purposes, subject to the conditions and safeguards referred to in Article 92 paragraph 1 of this Law or in so far as the discharging of obligations referred to in paragraph 1 of this Article is likely to render impossible or seriously impair the achievement of the purposes of that processing. In such cases, the controller shall take appropriate measures to protect the data subject's rights and freedoms, as well as the legitimate interests of the data subject, which shall include public publication of such information;	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.24-4(3)	Information to be Provided where Personal Data has not been Collected from the Data Subject	collecting or disclosure of personal data is expressly laid down by the law providing for the appropriate safeguards for the legitimate interests of the data subject;	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.24-4(4)	Information to be Provided where Personal Data has not been Collected from the Data Subject	where the personal data must remain confidential subject to an obligation of professional secrecy which is prescribed by the law.	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.25-1	Information which is Made Available or Provided to the Data Subject, where Processing is Carried out by the Competent Authorities for Special Purposes	Where processing is carried out by the competent authorities for special purposes, the controller shall be obliged to provide at the disposal of the data subject at least the following information:	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.

FDE #	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes
III.2.25-1(1)	Information which is Made Available or Provided to the Data Subject, where Processing is Carried out by the Competent Authorities for Special Purposes	on the identity and contact details of the controller;	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.25-1(2)	Information which is Made Available or Provided to the Data Subject, where Processing is Carried out by the Competent Authorities for Special Purposes	on the contact details of the data protection office, where they are designated;	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.25-1(3)	Information which is Made Available or Provided to the Data Subject, where Processing is Carried out by the Competent Authorities for Special Purposes	on the purpose of intended processing;	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.25-1(4)	Information which is Made Available or Provided to the Data Subject, where Processing is Carried out by the Competent Authorities for Special Purposes	on the right to file a complaint with the Commissioner and the contact details of the Commissioner;	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.25-1(5)	Information which is Made Available or Provided to the Data Subject, where Processing is Carried out by the Competent Authorities for Special Purposes	on the existence of the right to request from the controller access to, rectification or erasure of his personal data and/or on the existence of the right to restrict processing of such data.	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.25-2	Information which is Made Available or Provided to the Data Subject, where Processing is Carried out by the Competent Authorities for Special Purposes	In addition to information referred to in paragraph 1 of this Article, the controller shall be obliged to provide the data subject the following additional information, in order to enable, in certain cases, exercising of his rights:	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.25-2(1)	Information which is Made Available or Provided to the Data Subject, where Processing is Carried out by the Competent Authorities for Special Purposes	on the legal grounds for data processing;	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.25-2(2)	Information which is Made Available or Provided to the Data Subject, where Processing is Carried out by the Competent Authorities for Special Purposes	on the period for which the personal data will be stored, or where that is not possible, on the criteria used to determine that period;	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.25-2(3)	Information which is Made Available or Provided to the Data Subject, where Processing is Carried out by the Competent Authorities for Special Purposes	on the group of recipients of personal data, if any, including those in other states or international organisations;	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.25-2(4)	Information which is Made Available or Provided to the Data Subject, where Processing is Carried out by the Competent Authorities for Special Purposes	other data, where necessary, and in particular where the data subject has not been aware that their personal data has been collected.	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.25-3	Information which is Made Available or Provided to the Data Subject, where Processing is Carried out by the Competent Authorities for Special Purposes	The information referred to in paragraph 2 of this Article which is relating to individual types of data processing can be denied and/or provided under restrictions or at a later time to the data subject only in so far as necessary and in the duration necessary and proportionate in a democratic society with regard to the respect of the fundamental rights and legitimate interests of natural persons, in order to: The law can determine the types of processing which, in their entirety or in a part thereof, can be covered by some of the cases referred to in paragraph 3 of this Article.	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.25-3(1)	Information which is Made Available or Provided to the Data Subject, where Processing is Carried out by the Competent Authorities for Special Purposes	avoid disturbance of official or legally regulated collection of information, investigation or procedure;	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.25-3(2)	Information which is Made Available or Provided to the Data Subject, where Processing is Carried out by the Competent Authorities for Special Purposes	enable preventing, investigation and uncovering of criminal offences, prosecution of the perpetrators of criminal offences or enforcement of criminal sanctions;	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.25-3(3)	Information which is Made Available or Provided to the Data Subject, where Processing is Carried out by the Competent Authorities for Special Purposes	protect public safety;	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.25-3(4)	Information which is Made Available or Provided to the Data Subject, where Processing is Carried out by the Competent Authorities for Special Purposes	protect national security and defence;	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.

FDE #	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes
III.2.25-(3)(5)	Information which is Made Available or Provided to the Data Subject, where Processing is Carried out by the Competent Authorities for Special Purposes	protect the rights and freedoms of other persons.	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.2.26	Right of the Data Subject to Access	The data subject shall be entitled to request from the controller information on whether or not the personal data concerning the data subject is being processed, access to such personal data, as well as the following information: Where personal data is transferred to a third country or to an international organisation, the data subject shall have the right to be informed of the appropriate safeguards relating to the transfer, in compliance with Article 65 of this Law. The controller shall be obliged to provide a copy of the personal data undergoing processing at their request. For any further copies requested by the data subject, the controller may request compensation of the necessary costs for production of such additional copies requested by the data subject. Where the data subject makes the request on the copy by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form. Exercising of the rights and freedoms of other persons shall not adversely affect exercising of the right to obtain a copy referred to in paragraph 3 of this Article. Provisions of paragraphs 1 to 4 of this Article shall not apply to the processing carried out by the competent authorities for special purposes.	Functional	Intersects With	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	5	
III.2.26(1)	Right of the Data Subject to Access	on the purpose of the processing;	Functional	Intersects With	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	5	
III.2.26(2)	Right of the Data Subject to Access	on the types of personal data which is being processed;	Functional	Intersects With	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	5	
III.2.26(3)	Right of the Data Subject to Access	on the recipients or types of recipients to whom the personal data have been or will be disclosed, in particular on the recipients in other countries or international organisations;	Functional	Intersects With	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	5	
III.2.26(4)	Right of the Data Subject to Access	on the envisaged period for which the personal data will be stored, or, where that is not possible, on the criteria used to determine that period;	Functional	Intersects With	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	5	
III.2.26(5)	Right of the Data Subject to Access	on the existence of the right to request from the controller rectification or erasure of their personal data, the right to restriction of processing of personal data concerning the data subject and to object to such processing;	Functional	Intersects With	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	5	

FDE #	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes
III.2.26(6)	Right of the Data Subject to Access	on the right to file a complaint with the Commissioner;	Functional	Intersects With	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	5	
III.2.26(7)	Right of the Data Subject to Access	available information on the source of personal data, where the personal data has not been collected from the data subject;	Functional	Intersects With	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	5	
III.2.26(8)	Right of the Data Subject to Access	on the existence of automated decision-making, including profiling referred to in Article 38, paragraphs 1 and 4 and, at least in those cases, meaningful information about the logic involved, as well as on the significance and the expected consequences of such processing for the data subject.	Functional	Intersects With	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	5	
III.2.27	Right to Access to Data Processed by the Competent Authorities by the Data Subject	Where personal data is processed by the competent authorities for special purposes, the data subject shall be entitled to obtain from the controller information on whether or not the personal data concerning them is being processed, access to such data, as well as the following information:	Functional	Intersects With	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	5	
III.2.27(1)	Right to Access to Data Processed by the Competent Authorities by the Data Subject	on the purpose of processing and on the legal basis for the processing concerned;	Functional	Intersects With	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	5	
III.2.27(2)	Right to Access to Data Processed by the Competent Authorities by the Data Subject	on the types of personal data that is being processed;	Functional	Intersects With	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	5	
III.2.27(3)	Right to Access to Data Processed by the Competent Authorities by the Data Subject	on the recipient or the types of recipients to which the personal data has been disclosed, and in particular on the recipients in other countries or international organisations;	Functional	Intersects With	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	5	

FDE #	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes
III.2.27(4)	Right to Access to Data Processed by the Competent Authorities by the Data Subject	on the envisaged period for storage of personal data or, where this is not possible, on the criteria used to determine such period;	Functional	Intersects With	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	5	
III.2.27(5)	Right to Access to Data Processed by the Competent Authorities by the Data Subject	on the existence of the right to request from the controller rectification or erasure of their personal data, and/or the right to restrict the processing of such data;	Functional	Intersects With	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	5	
III.2.27(6)	Right to Access to Data Processed by the Competent Authorities by the Data Subject	on the right to file a complaint to the Commissioner, as well as the contact details of the Commissioner;	Functional	Intersects With	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	5	
III.2.27(7)	Right to Access to Data Processed by the Competent Authorities by the Data Subject	information on the personal data that is being processed, as well as the available information on the source thereof.	Functional	Intersects With	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	5	
III.2.28	Restriction of the Right to Access	The right to access referred to in Article 27 of this Law can be restricted, in its entirety or in a part thereof, only in so far as such partial or complete restriction is necessary and in the duration necessary and a proportionate measure in a democratic society, with respect of the fundamental rights and legitimate interests of the natural persons whose personal data is being processed, in order to: The law can determine the types of processing which, in their entirety or in a part thereof, can be covered by some of the cases referred to in paragraph 1 of this Article. The controller shall be obliged to notify the data subject in writing of the rejection or restriction of access to their personal data, without undue delay, and within 15 days at the latest. The controller shall not be obliged to act in compliance with paragraph 3 of this Article where that would call into question the realisation of purpose due to which access is refused or restricted. In the case referred to in paragraph 4 of this Article, as well as in the case where it is determined in the procedure at the request for access to data that the personal data of the person submitting the request is not being processed, the controller shall be obliged to, without undue delay, and within 15 days at the latest, notify in writing the person submitting the request that it has been determined by means of a check that there is no personal data with regard to which the right envisaged by the law can be exercised, as well as that they can address a complaint to the Commissioner and/or an action to a court. The controller shall be obliged to document the factual and legal reasons for passing of the decision on the restriction of right referred to in paragraph 1 of this Article, which must be placed at the disposal to the Commissioner, at their request.	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	
III.2.28(1)	Restriction of the Right to Access	avoid disturbance of official or legally regulated collection of information, investigation or procedures;	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	
III.2.28(2)	Restriction of the Right to Access	enable preventing, investigation and uncovering of criminal offences, prosecution of the perpetrators of criminal offences or enforcement of criminal sanctions;	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	
III.2.28(3)	Restriction of the Right to Access	protect public safety;	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	
III.2.28(4)	Restriction of the Right to Access	protect national security and defence;	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	
III.2.28(5)	Restriction of the Right to Access	protect the rights and freedoms of other persons.	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	
III.3	Right to Rectification, Supplement, Erasure, Restriction and to Data Portability	N/A	Functional	No Relationship	N/A	N/A	N/A	0	
III.3.29	Right to Rectification and Supplement	The data subject shall have the right to have the inaccurate personal data concerning to them rectified without undue delay. Depending on the purpose of the processing, the data subject shall have the right to have the incomplete personal data concerning to them completed, including by means of providing a supplementary statement.	Functional	Intersects With	Correcting Inaccurate Personal Data (PD)	PRI-06.1	Mechanisms exist to maintain a process for: (1) Data subjects to have inaccurate Personal Data (PD) maintained by the organization corrected or amended; and (2) Disseminating corrections or amendments of PD to other authorized users of the PD.	5	

FDE #	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes
III.3.30-1	Right to Erasure of Personal Data	The data subject shall have the right to have the personal data concerning them erased by the controller. The controller shall be obliged to erase the personal data referred to in paragraph 1 of this Article without undue delay in the following cases: Where the controller has made the personal data public, their obligation to erase personal data in compliance with paragraph 1 of this Article shall include taking all the reasonable measures, including technical measures, taking into account available technologies and the potentials to bear the costs of their use, with the aim of informing other controllers which are processing such personal data that the data subject has submitted the request to erase all the copies of such data and references, and/or electronic links to this data. The data subject shall submit the request for exercising of the right referred to in paragraph 1 of this Article to the controller.	Functional	Intersects With	Right to Erasure	PRI-06.5	Mechanisms exist to maintain a process to erase a data subject's Personal Data (PD), in accordance with applicable laws, regulations and contractual obligations pertaining to the retention of their PD.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.3.30-1(1)	Right to Erasure of Personal Data	the personal data is no longer necessary for realization of purpose for which it was collected or otherwise processed;	Functional	Intersects With	Personal Data (PD) Retention & Disposal	PRI-05	Mechanisms exist to: (1) Retain Personal Data (PD), including metadata, for an organization-defined time period to fulfill the purpose(s) identified in the notice or as required by law; (2) Dispose of, destroys, erases, and/or anonymizes the PD, regardless of the method of storage; and (3) Use organization-defined techniques or methods to ensure secure deletion or destruction of PD (including originals, copies and archived records).	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.3.30-1(2)	Right to Erasure of Personal Data	the data subject has withdrawn the consent based on which processing has been carried out, in compliance with Article 12, paragraph 1, item 1) or Article 17, paragraph 2, item 1) of this Law, and where there is no other legal ground for the processing;	Functional	Intersects With	Revoke Consent	PRI-03.4	Mechanisms exist to allow data subjects to revoke consent to collect, receive, process, store, transmit, share and/or update their Personal Data (PD).	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.3.30-1(3)	Right to Erasure of Personal Data	the data subject has filed a complaint to processing in compliance with:	Functional	No Relationship	N/A	N/A	N/A	0	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.3.30-1(3)(a)	Right to Erasure of Personal Data	Article 37, paragraph 1 of this Law, and where there is no other legal ground for processing which is overriding the legitimate interest, right or freedom of the data subject,	Functional	No Relationship	N/A	N/A	N/A	0	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.3.30-1(3)(b)	Right to Erasure of Personal Data	Article 37, paragraph 2 of this Law;	Functional	No Relationship	N/A	N/A	N/A	0	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.3.30-1(4)	Right to Erasure of Personal Data	the personal data has been unlawfully processed;	Functional	No Relationship	N/A	N/A	N/A	0	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.3.30-1(5)	Right to Erasure of Personal Data	the personal data has to be erased with the aim of discharging of the legal obligations of the controller;	Functional	No Relationship	N/A	N/A	N/A	0	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.3.30-1(6)	Right to Erasure of Personal Data	the personal data has been collected in relation to the use of information society services referred to in Article 16, paragraph 1 of this Law.	Functional	No Relationship	N/A	N/A	N/A	0	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.3.30-2	Right to Erasure of Personal Data	Paragraphs 1 through 3 of this Article shall not apply to the extent that the processing is necessary: Provisions of paragraphs 1 through 5 of this Article shall not apply to the processing carried out by the competent authorities for special purposes.	Functional	No Relationship	N/A	N/A	N/A	0	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.3.30-2(1)	Right to Erasure of Personal Data	for exercising the right of freedom of expression and information;	Functional	No Relationship	N/A	N/A	N/A	0	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.3.30-2(2)	Right to Erasure of Personal Data	for compliance with a legal obligation of the controller which requires processing or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;	Functional	No Relationship	N/A	N/A	N/A	0	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.3.30-2(3)	Right to Erasure of Personal Data	for reasons of public interest in the area of public health, in compliance with Article 17, paragraph 2, items 8) and 9) of this Law;	Functional	No Relationship	N/A	N/A	N/A	0	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.3.30-2(4)	Right to Erasure of Personal Data	for archiving purposes in the public interest, scientific or historical research purposes, as well as for statistical purposes in compliance with Article 92, paragraph 1 of this Law, and it is justifiably expected that the right referred to in paragraphs 1 and 2 of this Article could render impossible or seriously impair the achievement of the objectives of that purpose;	Functional	No Relationship	N/A	N/A	N/A	0	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.3.30-2(5)	Right to Erasure of Personal Data	submission, exercising or defence of legal claims.	Functional	No Relationship	N/A	N/A	N/A	0	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
III.3.31	Right to Restriction of Processing	The data subject shall have the right to restriction of processing of their personal data by the controller, where one of the following cases applies: Where processing has been restricted in compliance with paragraph 1 of this Article, such personal data may only be further processed based on the data subject's consent, except where it is a case of storage or for submission thereof, for the purpose of exercise or defence of legal claims or for the protection of the rights of other natural and/or legal persons or for reasons of realization of important public interests. Where processing has been restricted in compliance with paragraph 1 of this Article, the data controller shall be obliged to inform the data subject on the termination of the restriction, before the restriction of processing is lifted. Provisions of paragraphs 1 through 3 of this Article shall not apply to the processing carried out by the competent authorities for special purposes.	Functional	Intersects With	Data Subject Consent	PRI-03	Mechanisms exist to enable data subjects to authorize the collection, receipt, processing, storage, transmission, sharing, updating and/or disposal of their Personal Data (PD), where the data subject is provided, prior to collection, with: (1) Plain language explaining the potential data privacy risks of the authorization; (2) A means to decline the authorization; and (3) Necessary choice and consent-related criteria required by applicable statutory, regulatory and contractual obligations.	5	
III.3.31(1)	Right to Restriction of Processing	the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	
III.3.31(2)	Right to Restriction of Processing	the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of its use instead;	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	
III.3.31(3)	Right to Restriction of Processing	the controller no longer needs the personal data for the realization of purposes of the processing, but the data subject requested it for the submission, exercise or defence of legal claims;	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	
III.3.31(4)	Right to Restriction of Processing	the data subject has submitted an objection to processing pursuant to Article 37, paragraph 1 of this Law, and the verification whether the legitimate grounds for processing by the controller override the interests of the data subject or not.	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	

FDE #	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes
III.3.32	Right to Erasure or Restriction of Processing Carried Out by the Competent Authorities for Special Purposes	Where processing is carried out by the competent authorities for special purposes, the data subject shall have the right to have their personal data erased by the controller and the controller shall be obliged to, without undue delay, erase such data where the processing has been carried out in violation of the provisions of Articles 5, 13 and 18 of this Law or where the personal data must be erased for compliance with a legal obligation of the controller. The controller shall be obliged to restrict the processing, instead of erasing the personal data, in the following cases: Where processing has been restricted in compliance with paragraph 2, item 1) of this Article, the data controller shall be obliged to inform the data subject on the termination of the restriction, before the restriction of processing is lifted.	Functional	Intersects With	Right to Erasure	PRI-06.5	Mechanisms exist to maintain a process to erase a data subject's Personal Data (PD), in accordance with applicable laws, regulations and contractual obligations pertaining to the retention of their PD.	5	
III.3.32(1)	Right to Erasure or Restriction of Processing Carried Out by the Competent Authorities for Special Purposes	accuracy of personal data has been contested by the data subject, and the accuracy and/or inaccuracy thereof cannot be determined;	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	
III.3.32(2)	Right to Erasure or Restriction of Processing Carried Out by the Competent Authorities for Special Purposes	personal data must be stored with the aim of collecting and provision of evidence.	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	
III.3.33	Obligation of Notification Regarding Rectification or Erasure of Data, As Well As Restriction of Processing	The controller shall be obliged to notify all the recipients to which personal data has been disclosed on each rectification or erasure of personal data or restriction of the processing thereof in compliance with Article 29, Article 30, paragraph 1 and Article 31 of this Law, unless where that is impossible or requires disproportionate use of time and resources. The controller shall be obliged to notify the data subject, at their request, of all the recipients referred to in paragraph 1 of this Article. Provisions of paragraphs 1 through 2 of this Article shall not apply to the processing carried out by the competent authorities for special purposes.	Functional	Intersects With	Notification of Disclosure Request To Data Subject	PRI-14.2	Mechanisms exist to notify data subjects of applicable legal requests to disclose Personal Data (PD).	5	
III.3.34	Obligation of Notification Regarding Rectification or Erasure of Data, as well as Restriction of Processing Carried Out by the Competent Authorities for Special Purposes	Where the processing is carried out by the competent authorities for special purposes, the controller shall be obliged to notify the data subject in writing of the rejection of rectification or erasure of their personal data, and/or of the restriction of processing, as well as of the reasons for such rejection or restriction. The controller shall be completely or partially relieved from the obligation of notification referred to in paragraph 1 of this Article in so far as such restriction is a necessary and proportionate measure in a democratic society, with due respect of the fundamental rights and legitimate interest of the data subjects, in order to: In the case referred to in paragraphs 1 and 2 of this Article, the controller shall be obliged to inform the data subject that they can address a complaint to the Commissioner and/or an action to a court. The controller shall be obliged to inform the competent authority from which such data has been obtained of the rectification of inaccurate data. Where the personal data has been rectified, erased or where the processing thereof has been restricted in compliance with Article 29 and Article 32, paragraphs 1 and 2 of this Law, the controller shall be obliged to inform the recipients of such data of the rectification, erasure or restriction of processing thereof. The recipients of data which have been informed in compliance with paragraph 5 of this Article shall be obliged to rectify, erase or restrict the processing of data which is kept by them.	Functional	Intersects With	Data Subject Feedback Management	PRI-06.4	Mechanisms exist to maintain a process to efficiently and effectively respond to requests, complaints, concerns and/or questions from authenticated data subjects about Personal Data (PD) the organization collects, receives, processes, stores, transmits, shares, updates and/or disposes.	5	
III.3.34	Obligation of Notification Regarding Rectification or Erasure of Data, as well as Restriction of Processing Carried Out by the Competent Authorities for Special Purposes	Where the processing is carried out by the competent authorities for special purposes, the controller shall be obliged to notify the data subject in writing of the rejection of rectification or erasure of their personal data, and/or of the restriction of processing, as well as of the reasons for such rejection or restriction. The controller shall be completely or partially relieved from the obligation of notification referred to in paragraph 1 of this Article in so far as such restriction is a necessary and proportionate measure in a democratic society, with due respect of the fundamental rights and legitimate interest of the data subjects, in order to: In the case referred to in paragraphs 1 and 2 of this Article, the controller shall be obliged to inform the data subject that they can address a complaint to the Commissioner and/or an action to a court. The controller shall be obliged to inform the competent authority from which such data has been obtained of the rectification of inaccurate data. Where the personal data has been rectified, erased or where the processing thereof has been restricted in compliance with Article 29 and Article 32, paragraphs 1 and 2 of this Law, the controller shall be obliged to inform the recipients of such data of the rectification, erasure or restriction of processing thereof. The recipients of data which have been informed in compliance with paragraph 5 of this Article shall be obliged to rectify, erase or restrict the processing of data which is kept by them.	Functional	Intersects With	Data Subject Communications	PRI-17	Mechanisms exist to craft disclosures and communications to data subjects in a manner that is concise, unambiguous and understandable by a reasonable person.	5	
III.3.34(1)	Obligation of Notification Regarding Rectification or Erasure of Data, as well as Restriction of Processing Carried Out by the Competent Authorities for Special Purposes	avoid disturbance of official or legally regulated collection of information, investigation or procedures;	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	
III.3.34(2)	Obligation of Notification Regarding Rectification or Erasure of Data, as well as Restriction of Processing Carried Out by the Competent Authorities for Special Purposes	enable preventing, investigation and uncovering of criminal offences, prosecution of the perpetrators of criminal offences or enforcement of criminal sanctions;	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	
III.3.34(3)	Obligation of Notification Regarding Rectification or Erasure of Data, as well as Restriction of Processing Carried Out by the Competent Authorities for Special Purposes	protect public safety;	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	
III.3.34(4)	Obligation of Notification Regarding Rectification or Erasure of Data, as well as Restriction of Processing Carried Out by the Competent Authorities for Special Purposes	protect national security and defence;	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	

FDE #	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes
III.3.34(5)	Obligation of Notification Regarding Rectification or Erasure of Data, as well as Restriction of Processing Carried Out by the Competent Authorities for Special Purposes	protect the rights and freedoms of other persons.	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	
III.3.35	Exercising of the Right of the Data Subject Where Processing is Carried Out by the Competent Authorities for Special Purposes and Verification by the Commissioner	In the cases referred to in Article 25, paragraph 3, Article 28, paragraphs 3 and 4 and Article 34, paragraph 2 of this Law, the rights of the data subjects can additionally be exercised through the Commissioner, in compliance with their powers prescribed by this Law. The controller shall be obliged to notify the data subject of the option of exercising of their rights through the Commissioner in the cases referred to in paragraph 1 of this Article. Where, in the cases referred to in paragraph 1 of this Article, the rights of the data subjects are exercised through the Commissioner, the Commissioner shall be obliged to notify such data subject at least of the verification conducted and of the supervision of processing of their personal data, as well as of the right to address the court for the protection of their rights.	Functional	No Relationship	N/A	N/A	N/A	0	
III.3.36	Right to Data Portability	The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit such data to another controller without hindrance from the controller to which the personal data has been provided, where the following conditions have been aggregately fulfilled: The right referred to in paragraph 1 of this Article shall additionally include the right of the data subject to have their personal data transferred directly to another controller by the controllers to which such data has previously been transferred, where technically feasible. The exercise of the right referred to in paragraph 1 of this Article shall be without prejudice to Article 30 of this Law. The right referred to in paragraph 1 of this Article cannot be exercised where the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authorities vested in the controller. Exercising of the right referred to in paragraph 1 of this Article may not adversely affect the rights and freedoms of other persons. Provisions of paragraphs 1 through 4 of this Article shall not apply to the processing carried out by the competent authorities for special purposes.	Functional	Intersects With	Data Portability	PRI-06.6	Mechanisms exist to format exports of Personal Data (PD) in a structured, machine-readable format that allows data subjects to transfer their PD to another controller without hindrance.	5	
III.3.36(1)	Right to Data Portability	the processing is based on consent pursuant to Article 12, paragraph 1, item 1) or Article 17, paragraph 2, item 1) of this Law or based on a contract, in compliance with Article 12, paragraph 1, item 2) of this Law;	Functional	No Relationship	N/A	N/A	N/A	0	
III.3.36(2)	Right to Data Portability	the processing is carried out by automated means.	Functional	No Relationship	N/A	N/A	N/A	0	
III.4	Right to Object and Automated Individual Decision-Making	N/A	Functional	No Relationship	N/A	N/A	N/A	0	
III.4.37	Right to Object	Where they consider that to be duly justified, on grounds relating to his or her particular situation, the data subject shall have the right to, at any time, submit an objection to processing of personal data concerning him or her to the controller, which is carried out in compliance with Article 12, paragraph 1, items 5) and 6) of this Law, including profiling based on those provisions. The controller shall be obliged to discontinue processing of the personal data relating to the person submitting the objection, unless the controller demonstrates the existence of the lawful reasons for the processing which override the interests, rights and freedoms of the data subject or are relating to submission, exercise or defence of legal claims. The data subject shall have the right to, at any given moment, submit an objection to processing of the personal data concerning him or her which is processed for direct marketing purposes, which includes profiling, to the extent that it is related to such direct marketing. Where the data subject submits an objection to processing for direct marketing purposes, the personal data may no longer be processed for such purposes. At the latest at the time of the first communication with the data subject, the right referred to in paragraphs 1 and 2 of this Article shall be explicitly brought to the attention of the data subject by the controller and shall be presented clearly and separately from any other information. In the context of the use of information society services, the data subject shall have the right to submit objection by automated means, in compliance with the technical specifications for the use of services. Where personal data is processed for scientific or historical research purposes or for statistical purposes in compliance with Article 92 of this Law, the data subject, on grounds relating to his or her particular situation, shall have the right to submit objection to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.	Functional	Intersects With	Revoke Consent	PRI-03.4	Mechanisms exist to allow data subjects to revoke consent to collect, receive, process, store, transmit, share and/or update their Personal Data (PD).	5	
III.4.38	Automated Individual Decision-Making and Profiling	The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, where such decision produces legal effects concerning such person or where such decision significantly affects his or her position. Paragraph 1 of this Article shall not apply where the decision is: In the case referred to in paragraph 2, items 1) and 3) of this Article, the controller shall be obliged to implement suitable measures to safeguard the rights, freedoms and legitimate interests of the data subject, and at least the right to ensure a natural person's intervention under control of the controller in decision-making, the right of the data subject to express his or her point of view with regard to the decision, as well as the right of the data subject to contest the decision before the authorized person with the controller. The decisions referred to in paragraph 2 of this Article cannot be based on special types of personal data referred to in Article 17, paragraph 1 of this Law, unless Article 17, paragraph 2, items 1) and 5) of this Law apply and where suitable measures to safeguard the rights, freedoms and legitimate interests of the data subject are in place. Provisions of paragraphs 1 through 4 of this Article shall not apply to the processing of data carried out by the competent authorities for special purposes.	Functional	Intersects With	Automated Decision-Making Technology (ADMT) Opt-Out Consent	PRI-19.2	Mechanisms exist to provide concise, unambiguous and understandable instructions on how data subjects can opt-out of Automated Decision-Making Technology (ADMT).	5	
III.4.38(1)	Automated Individual Decision-Making and Profiling	necessary for conclusion or performance of a contract between the data subject and a data controller;	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	
III.4.38(2)	Automated Individual Decision-Making and Profiling	based on the Law, where such law prescribes suitable measures to safeguard the rights, freedoms and legitimate interests of the data subject;	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	
III.4.38(3)	Automated Individual Decision-Making and Profiling	based on the explicit consent of the data subject.	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	

FDE #	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes
III.4.39	Automated Individual Decision-Making and Profiling Regarding the Processing Carried Out by the Competent Authorities for Special Purposes	Decision-making based solely on automated processing carried out by the competent authorities for special purposes, including profiling, shall be prohibited, where such decision may produce negative legal effects concerning the data subject or where such decision significantly affects his or her position, except where such decision-making is based on the law and where such law lays down suitable measures to safeguard the rights and freedoms of the data subject, and at least the right to ensure a natural person's intervention under control of the controller in decision-making. The decision referred to in paragraph 1 of this Article may not be based on special types of personal data referred to in Article 18, paragraph 1 of this Law, unless where suitable measures to safeguard the rights, freedoms and legitimate interests of the data subject are applied. Profiling leading to discrimination of natural persons on the grounds of the special types of personal data referred to in Article 18, paragraph 1 of this Law shall be prohibited.	Functional	Intersects With	Automated Decision-Making Technology (ADMT) For Data Subject Actions	PRI-19	Mechanisms exist to ensure data subject actions utilizing Automated Decision-Making Technology (ADMT) where computation replaces, or substantially replaces, human decisionmaking, conforms with all applicable statutory, regulatory and/or contractual obligations.	5	
III.5	Restrictions	See FDE for details.	Functional	No Relationship	N/A	N/A	N/A	0	
IV	CONTROLLER AND PROCESSOR	N/A	Functional	No Relationship	N/A	N/A	N/A	0	
IV.1	General Obligations	N/A	Functional	No Relationship	N/A	N/A	N/A	0	
IV.1.41	Obligations of the Controllers	The controller shall be obliged to implement appropriate technical, organizational and staff-related measures to ensure that processing is performed in accordance with this Law and to be able to demonstrate that, taking into account the nature, scope, circumstances and purpose of processing, as well as the likelihood of the occurrence of risks and the risk level for the rights and freedoms of natural persons. The measures referred to in paragraph 1 of this Article shall be reviewed and updated where necessary. Where proportionate in relation to processing activities, the measures referred to in paragraph 1 of this Article shall include the implementation of appropriate internal acts of the controller on the protection of personal data. The controller may demonstrate their compliance with the obligations referred to in paragraph 1 of this Article based on the implementation of the approved code of conduct as referred to in Article 59 of this Law or based on the issued certificate as referred to in Article 61 of this Law. Paragraph 4 of this Article shall not apply to the processing carried out by the competent authorities for special purposes.	Functional	Intersects With	Security of Personal Data (PD)	PRI-01.6	Mechanisms exist to ensure Personal Data (PD) is protected by logical and physical security safeguards that are sufficient and appropriately scoped to protect the confidentiality and integrity of the PD.	5	
IV.1.42	Safeguards	Taking into account the level of technical achievements and the costs of their implementation, the nature, scope, circumstances and purpose of processing, as well as the likelihood of the occurrence of risk and the risk level for the rights and freedoms of the natural persons arising from the processing, the controller shall be obliged, both on the occasion of determining the processing method and at the time of processing itself, to: The controller shall be obliged to, through constant implementation of appropriate technical, organisational and staff-related measures, ensure that only personal data which are necessary for realization of each specific purpose of the processing are processed. That obligation applies to the amount of personal data collected, the extent of its processing, the period of its storage and its accessibility. The measures referred to in paragraph 2 of this Article must ensure that personal data cannot be made accessible without the intervention of the natural person to an indefinite number of natural persons. The issued certificate as referred to in Article 61 of this Law may be used by the controller to demonstrate their compliance with the obligations referred to in paragraphs 1 through 3 of this Article. Paragraph 4 of this Article shall not apply to the processing carried out by the competent authorities for special purposes	Functional	Intersects With	Security of Personal Data (PD)	PRI-01.6	Mechanisms exist to ensure Personal Data (PD) is protected by logical and physical security safeguards that are sufficient and appropriately scoped to protect the confidentiality and integrity of the PD.	5	
IV.1.42(1)	Safeguards	implement appropriate technical, organizational and staff-related measures, such as pseudonymisation, which are aimed at ensuring implementation of data-protection principles, such as data minimization in an effective manner.	Functional	Intersects With	Security of Personal Data (PD)	PRI-01.6	Mechanisms exist to ensure Personal Data (PD) is protected by logical and physical security safeguards that are sufficient and appropriately scoped to protect the confidentiality and integrity of the PD.	5	
IV.1.42(2)	Safeguards	ensure implementation of the necessary safeguards during the processing, in order to meet the requirements for processing prescribed by this Law and to protect the rights and freedoms of data subjects.	Functional	Intersects With	Security of Personal Data (PD)	PRI-01.6	Mechanisms exist to ensure Personal Data (PD) is protected by logical and physical security safeguards that are sufficient and appropriately scoped to protect the confidentiality and integrity of the PD.	5	
IV.1.43	Joint Controllers	Where two or more controllers jointly determine the purposes and method of processing, they shall be joint controllers. The joint controllers referred to in paragraph 1 of this Article shall, in a transparent manner, determine their respective responsibilities for compliance with the obligations prescribed by this Law, in particular the obligations as regards the exercising of the rights of the data subject and their respective fulfilling of duties to provide to such person information referred to in Articles 23 through 25 of this Law. The responsibility referred to in paragraph 2 of this Article shall be regulated by an agreement of the joint controllers, unless where such responsibility is laid down by the law applicable to the controllers. The agreement referred to in paragraph 3 of this Article must designate a contact person for data subject and regulate the relationships of each individual joint controller vis-à-vis the data subject. The essence of the agreement referred to in paragraph 3 of this Article must be made available to the data subject. Provisions of paragraphs 4 and 5 of this Article shall not apply to the processing carried out by the competent authorities for special purposes. In respect of the provisions of the agreement referred to in paragraph 3 of this Article, the data subject may exercise his or her rights laid down by this Law in respect of and against each of the joint controllers.	Functional	Intersects With	Joint Processing of Personal Data (PD)	PRI-07.2	Mechanisms exist to clearly define and communicate the organization's role in processing Personal Data (PD) in the data processing ecosystem.	5	
IV.1.44	Representatives of Controllers or Processors Which Do Not Have Their Seat in the Republic of Serbia	The controller and/or the processor, in the cases referred to in Article 3, paragraph 4 of this Law, shall be obliged to designate in writing a representative in the Republic of Serbia, unless where: The controller and/or the processor shall authorize the representative referred to in paragraph 1 of this Article as a person to which, in addition to the controller or processor, and/or instead of them, the data subject, the Commissioner or another person can be addressed in respect of all the issues related to processing of personal data, for the purposes of ensuring compliance with the provisions of this Law. A complaint, action and other legal requests referred to in this Law can be filed against the controller or processor, irrespective of whether their representative referred to in paragraph 1 of this Article has been designated or not.	Functional	Intersects With	Localized Representation	CPL-08	Mechanisms exist to appoint localized representation with a physical presence in localities, as required by applicable laws and/or regulations.	5	
IV.1.44(1)	Representatives of Controllers or Processors Which Do Not Have Their Seat in the Republic of Serbia	the processing is occasional, does not include, on a large scale, processing of special data referred to in Article 17, paragraph 1 of this Law or personal data relating to convictions for criminal offences and punishable offences referred to in Article 19 of this Law, and is unlikely to cause any risk to the rights and freedoms of natural persons, taking into account the nature, circumstances, scope and purposes of the processing;	Functional	No Relationship	N/A	N/A	N/A	0	
IV.1.44(2)	Representatives of Controllers or Processors Which Do Not Have Their Seat in the Republic of Serbia	the controller i.e. the processor is a public authority.	Functional	No Relationship	N/A	N/A	N/A	0	

FDE #	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes
IV.1.45-1	Processor	Where processing is carried out on behalf of a controller, the controller may designate as processors only the person or the public authority which can provide sufficient guarantees relating to implementation of appropriate technical, organizational and staff-related measures, in such a manner as to ensure that processing will be carried out in compliance with the provisions of this Law and that the protection of the rights of the data subject is ensured. The processor referred to in paragraph 1 of this Article may entrust the processing to another processor only where they are duly authorized to do so by the controller based on a general or specific written authorisation. Where processing is carried out on the basis of a general authorisation, the processor shall be obliged to inform the controller of any intended changes concerning the selection of another processor, thereby giving the controller the opportunity to oppose such change. Processing by a processor must be governed by a contract or other legally binding act, which is concluded and/or adopted in writing, which shall include by electronic means as well, that is binding on the processor with regard to the controller and that regulates the subject-matter and the duration of the processing, the nature and purpose of the processing, the type of personal data and the type of persons on which data is to be processed, as well as the rights and obligations of the controller. The contract or another legally binding act referred to in paragraph 3 of this Article shall prescribe that the processor shall be obliged to: In the case referred to in paragraph 4, item 8) of this Article, the processor shall be obliged to warn the controller without delay if in their opinion the written instructions obtained from them is not in compliance with this Law or another law regulating protection of personal data.	Functional	Intersects With	Data Privacy Requirements for Contractors & Service Providers	PRI-07.1	Mechanisms exist to include data privacy requirements in contracts and other acquisition-related documents that establish data privacy roles and responsibilities for contractors and service providers.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.1.45-1(1)	Processor	process the personal data only based on written instructions from the controller, including the instructions with regard to transfers of personal data to other countries or international organisations, unless where the processor is obliged to process data by the law. In such a case, the processor shall be obliged to inform the controller of that legal obligation before commencing the processing, unless where that law prohibits provision of such information on the grounds of protection of an important public interest;	Functional	Intersects With	Data Privacy Requirements for Contractors & Service Providers	PRI-07.1	Mechanisms exist to include data privacy requirements in contracts and other acquisition-related documents that establish data privacy roles and responsibilities for contractors and service providers.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.1.45-1(2)	Processor	ensure that the natural person which is authorised to process the personal data has committed themselves to confidentiality or that such person is subject to a legal obligation of confidentiality;	Functional	Intersects With	Data Privacy Requirements for Contractors & Service Providers	PRI-07.1	Mechanisms exist to include data privacy requirements in contracts and other acquisition-related documents that establish data privacy roles and responsibilities for contractors and service providers.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.1.45-1(3)	Processor	take all the necessary measures in compliance with Article 50 of this Law;	Functional	Intersects With	Data Privacy Requirements for Contractors & Service Providers	PRI-07.1	Mechanisms exist to include data privacy requirements in contracts and other acquisition-related documents that establish data privacy roles and responsibilities for contractors and service providers.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.1.45-1(4)	Processor	comply with the conditions for entrusting the processing to another processor as referred to in paragraphs 2 and 7 of this Article;	Functional	Intersects With	Data Privacy Requirements for Contractors & Service Providers	PRI-07.1	Mechanisms exist to include data privacy requirements in contracts and other acquisition-related documents that establish data privacy roles and responsibilities for contractors and service providers.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.1.45-1(5)	Processor	taking into account the nature of the processing, assist the controller by applying appropriate technical, organisational and staff-related measures, insofar as this is possible, for the fulfilment of the controller's obligation regarding the requests for exercising the rights of the data subject laid down in Chapter III of this Law;	Functional	Intersects With	Data Privacy Requirements for Contractors & Service Providers	PRI-07.1	Mechanisms exist to include data privacy requirements in contracts and other acquisition-related documents that establish data privacy roles and responsibilities for contractors and service providers.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.1.45-1(6)	Processor	assist the controller in compliance with the obligations referred to in Article 50 and Articles 52 through 55 of this Law, taking into account the nature of processing and information available to them;	Functional	Intersects With	Data Privacy Requirements for Contractors & Service Providers	PRI-07.1	Mechanisms exist to include data privacy requirements in contracts and other acquisition-related documents that establish data privacy roles and responsibilities for contractors and service providers.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.1.45-1(7)	Processor	following the completion of agreed activities of processing, and based on the decision of the controller, delete or return to the controller complete personal data and delete all copies of such data, unless where the obligation to store data is legally prescribed;	Functional	Intersects With	Data Privacy Requirements for Contractors & Service Providers	PRI-07.1	Mechanisms exist to include data privacy requirements in contracts and other acquisition-related documents that establish data privacy roles and responsibilities for contractors and service providers.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.1.45-1(8)	Processor	make available to the controller complete information necessary to demonstrate compliance with the obligations of the processor laid down in this Article, as well as information allowing for and contributing to the control of work of the processor which is conducted by the controller or another person authorized to do so by the controller.	Functional	Intersects With	Data Privacy Requirements for Contractors & Service Providers	PRI-07.1	Mechanisms exist to include data privacy requirements in contracts and other acquisition-related documents that establish data privacy roles and responsibilities for contractors and service providers.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.1.45-2	Processor	Where the processing is carried out by the competent authorities for special purposes, the contract or another legally binding act referred to in paragraph 3 of this Article shall prescribe that the processor shall be obliged to: Where a processor designates another processor for carrying out specific processing activities on behalf of the controller, the same data protection obligations as set out in the contract or other legally binding act, which is concluded and/or adopted in writing, which shall additionally include by electronic means, whereby between the processor and another processor sufficient guarantees for implementation of adequate technical, organizational and staff-related measures ensuring that the processing is carried out in compliance with this Law shall be laid down. Where that other processor fails to fulfil its obligations relating to data protection, the processor shall remain fully liable to the controller for the performance of that other processor's obligations. Where the processor violates the provisions of this Law by determining the purpose and method of processing of the personal data, the processor shall be considered to be the controller vis-à-vis such processing. The implementation of the approved code of conduct as referred to in Article 59 of this Law and/or the issued certificate as referred to in Article 61 of this Law can be applied to demonstrate that the processor fulfils the obligations of providing guarantees referred to in paragraphs 1 and 7 of this Article. The legal relationship between the controller and the processor which is regulated in compliance with paragraphs 3 and 7 of this Article can be based in its entirety or in a part thereof on the standard contractual clauses referred to in paragraph 11 of this Article, including those relating to the certificate that is granted to the controller or to the processor in compliance with Articles 61 and 62 of this Law. The Commissioner may draw up standard contractual clauses which shall pertain to the obligations referred to in paragraphs 3 and 7 of this Article, taking into account in particular the European practice in drawing up of standard contractual clauses.	Functional	Intersects With	Data Privacy Requirements for Contractors & Service Providers	PRI-07.1	Mechanisms exist to include data privacy requirements in contracts and other acquisition-related documents that establish data privacy roles and responsibilities for contractors and service providers.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.1.45-2(1)	Processor	process personal data on the basis of the instructions of the controller only;	Functional	Intersects With	Data Privacy Requirements for Contractors & Service Providers	PRI-07.1	Mechanisms exist to include data privacy requirements in contracts and other acquisition-related documents that establish data privacy roles and responsibilities for contractors and service providers.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.1.45-2(2)	Processor	ensure that the person authorized to process data has committed themselves to confidentiality or that such person is subject to a legal obligation of confidentiality;	Functional	Intersects With	Data Privacy Requirements for Contractors & Service Providers	PRI-07.1	Mechanisms exist to include data privacy requirements in contracts and other acquisition-related documents that establish data privacy roles and responsibilities for contractors and service providers.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.1.45-2(3)	Processor	assist in an appropriate manner the controller in fulfilment of the controller's obligation to comply with the provisions on the rights of data subjects referred to in Chapter III of this Law;	Functional	Intersects With	Data Privacy Requirements for Contractors & Service Providers	PRI-07.1	Mechanisms exist to include data privacy requirements in contracts and other acquisition-related documents that establish data privacy roles and responsibilities for contractors and service providers.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.1.45-2(4)	Processor	following the completion of agreed activities of processing, and based on the decision of the controller, delete or return to the controller complete personal data and delete all copies of such data, unless where the obligation to store data is legally prescribed;	Functional	Intersects With	Data Privacy Requirements for Contractors & Service Providers	PRI-07.1	Mechanisms exist to include data privacy requirements in contracts and other acquisition-related documents that establish data privacy roles and responsibilities for contractors and service providers.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.

FDE #	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes
IV.1.45-2(5)	Processor	make available to the controller complete information which is necessary to demonstrate the compliance with the obligations of the processor laid down in this Article;	Functional	Intersects With	Data Privacy Requirements for Contractors & Service Providers	PRI-07.1	Mechanisms exist to include data privacy requirements in contracts and other acquisition-related documents that establish data privacy roles and responsibilities for contractors and service providers.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.1.45-2(6)	Processor	ensure compliance with the conditions referred to in paragraphs 2, 3 and 6 of this Article where they entrusts the processing to another processor.	Functional	Intersects With	Data Privacy Requirements for Contractors & Service Providers	PRI-07.1	Mechanisms exist to include data privacy requirements in contracts and other acquisition-related documents that establish data privacy roles and responsibilities for contractors and service providers.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.1.46	Processing upon an Order	The processor and/or any other person has access to personal data under the authority of the controller or of the processor, may not process such data without an order from the controller, unless where such processing is laid down by the law.	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
IV.1.47-1	Records of Processing Activities	The controller and their representative, where they are designated, shall be obliged to maintain records on processing activities under their responsibility, which shall contain information on: Provisions of paragraph 1 of this Article shall not apply where the processing is carried out by the competent authorities for special purposes.	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.1.47-1(1)	Records of Processing Activities	the name and contact details of the controller and, if any and/or where they are designated, on the joint controllers, the controller's representative and the data protection officer;	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.1.47-1(2)	Records of Processing Activities	the purpose of the processing;	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.1.47-1(3)	Records of Processing Activities	the type of data subjects and on the types of personal data;	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.1.47-1(4)	Records of Processing Activities	the type of recipients to whom the personal data have been or will be disclosed, including recipients in other countries or international organisations;	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.1.47-1(5)	Records of Processing Activities	the transfers of personal data to other countries or international organisations, including the name of other country or international organization, as well as the documents on implementation of safeguards where data is transferred in compliance with Article 69, paragraph 2 of this Law, where such transfer of personal data is performed;	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.1.47-1(6)	Records of Processing Activities	the time limit upon the expiry of which certain types of personal data shall be erased, where such time limit has been set;	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.1.47-1(7)	Records of Processing Activities	the general description of the safeguards referred to in Article 50, paragraph 1 of this Law, where possible.	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.1.47-2	Records of Processing Activities	Where the processing is carried out by the competent authorities for special purposes, the controller shall be obliged to maintain the records on all the types of processing activities under their responsibility, which shall contain information on:	Functional	Intersects With	Documenting Data Processing Activities	PRI-14	Mechanisms exist to document Personal Data (PD) processing activities that covers collection, receiving, processing, storage, transmission, sharing, updating and/or disposal actions with sufficient detail to demonstrate conformity with applicable statutory, regulatory and contractual requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.1.47-2(1)	Records of Processing Activities	the name and contact details of the controller and, if any and/or where they are designated, on the joint controllers and the data protection officers;	Functional	Intersects With	Documenting Data Processing Activities	PRI-14	Mechanisms exist to document Personal Data (PD) processing activities that covers collection, receiving, processing, storage, transmission, sharing, updating and/or disposal actions with sufficient detail to demonstrate conformity with applicable statutory, regulatory and contractual requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.1.47-2(2)	Records of Processing Activities	the purpose of the processing;	Functional	Intersects With	Documenting Data Processing Activities	PRI-14	Mechanisms exist to document Personal Data (PD) processing activities that covers collection, receiving, processing, storage, transmission, sharing, updating and/or disposal actions with sufficient detail to demonstrate conformity with applicable statutory, regulatory and contractual requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.1.47-2(3)	Records of Processing Activities	the type of data subjects and on the types of personal data;	Functional	Intersects With	Documenting Data Processing Activities	PRI-14	Mechanisms exist to document Personal Data (PD) processing activities that covers collection, receiving, processing, storage, transmission, sharing, updating and/or disposal actions with sufficient detail to demonstrate conformity with applicable statutory, regulatory and contractual requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.1.47-2(4)	Records of Processing Activities	the type of recipients to whom the personal data have been or will be disclosed, including recipients in other countries or international organisations;	Functional	Intersects With	Documenting Data Processing Activities	PRI-14	Mechanisms exist to document Personal Data (PD) processing activities that covers collection, receiving, processing, storage, transmission, sharing, updating and/or disposal actions with sufficient detail to demonstrate conformity with applicable statutory, regulatory and contractual requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.1.47-2(5)	Records of Processing Activities	the use of profiling, where profiling is used;	Functional	Intersects With	Documenting Data Processing Activities	PRI-14	Mechanisms exist to document Personal Data (PD) processing activities that covers collection, receiving, processing, storage, transmission, sharing, updating and/or disposal actions with sufficient detail to demonstrate conformity with applicable statutory, regulatory and contractual requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.1.47-2(6)	Records of Processing Activities	the types of personal data transfers to other countries or international organisations, where such personal data transfers are performed;	Functional	Intersects With	Documenting Data Processing Activities	PRI-14	Mechanisms exist to document Personal Data (PD) processing activities that covers collection, receiving, processing, storage, transmission, sharing, updating and/or disposal actions with sufficient detail to demonstrate conformity with applicable statutory, regulatory and contractual requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.1.47-2(7)	Records of Processing Activities	the legal grounds for the processing procedure, including the personal data transfer;	Functional	Intersects With	Documenting Data Processing Activities	PRI-14	Mechanisms exist to document Personal Data (PD) processing activities that covers collection, receiving, processing, storage, transmission, sharing, updating and/or disposal actions with sufficient detail to demonstrate conformity with applicable statutory, regulatory and contractual requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.1.47-2(8)	Records of Processing Activities	the time limit upon the expiry of which certain types of personal data shall be erased, where such time limit has been set; 36	Functional	Intersects With	Documenting Data Processing Activities	PRI-14	Mechanisms exist to document Personal Data (PD) processing activities that covers collection, receiving, processing, storage, transmission, sharing, updating and/or disposal actions with sufficient detail to demonstrate conformity with applicable statutory, regulatory and contractual requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.

FDE #	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes
IV.1.47-2(9)	Records of Processing Activities	the general description of the safeguards referred to in Article 50, paragraph 1 of this Law, where possible.	Functional	Intersects With	Documenting Data Processing Activities	PRI-14	Mechanisms exist to document Personal Data (PD) processing activities that covers collection, receiving, processing, storage, transmission, sharing, updating and/or disposal actions with sufficient detail to demonstrate conformity with applicable statutory, regulatory and contractual requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.1.47-3	Records of Processing Activities	The processor and their representative, where they are designated, shall be obliged to maintain the records on all the types of processing activities performed on behalf of a controller, which shall contain information on: Provisions of paragraph 4 of this Article shall not apply where the processing is carried out by the competent authorities for special purposes.	Functional	Intersects With	Documenting Data Processing Activities	PRI-14	Mechanisms exist to document Personal Data (PD) processing activities that covers collection, receiving, processing, storage, transmission, sharing, updating and/or disposal actions with sufficient detail to demonstrate conformity with applicable statutory, regulatory and contractual requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.1.47-3(1)	Records of Processing Activities	the name and contact details of each processor and each controller on behalf of which processing is carried out, and/or if any and/or where they are designated, on the controller's or processor's representative and the data protection officer;	Functional	Intersects With	Documenting Data Processing Activities	PRI-14	Mechanisms exist to document Personal Data (PD) processing activities that covers collection, receiving, processing, storage, transmission, sharing, updating and/or disposal actions with sufficient detail to demonstrate conformity with applicable statutory, regulatory and contractual requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.1.47-3(2)	Records of Processing Activities	the types of processing performed on behalf of each controller;	Functional	Intersects With	Documenting Data Processing Activities	PRI-14	Mechanisms exist to document Personal Data (PD) processing activities that covers collection, receiving, processing, storage, transmission, sharing, updating and/or disposal actions with sufficient detail to demonstrate conformity with applicable statutory, regulatory and contractual requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.1.47-3(3)	Records of Processing Activities	the transfers of personal data to other countries or international organisations, including the name of other country or international organization, as well as the documents on implementation of safeguards where data is transferred in compliance with Article 69, paragraph 2 of this Law, where such transfer of personal data is performed;	Functional	Intersects With	Documenting Data Processing Activities	PRI-14	Mechanisms exist to document Personal Data (PD) processing activities that covers collection, receiving, processing, storage, transmission, sharing, updating and/or disposal actions with sufficient detail to demonstrate conformity with applicable statutory, regulatory and contractual requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.1.47-3(4)	Records of Processing Activities	the general description of the safeguards referred to in Article 50, paragraph 1 of this Law, where possible.	Functional	Intersects With	Documenting Data Processing Activities	PRI-14	Mechanisms exist to document Personal Data (PD) processing activities that covers collection, receiving, processing, storage, transmission, sharing, updating and/or disposal actions with sufficient detail to demonstrate conformity with applicable statutory, regulatory and contractual requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.1.47-4	Records of Processing Activities	Where the processing is carried out by the competent authorities for special purposes, each processor shall be obliged to maintain the records on all the types of processing activities performed on behalf of the controller, which shall contain information on: The records referred to in paragraphs 1, 3, 4 and 6 of this Article shall be maintained in writing, which shall include the electronic form and shall be kept permanently. The controller or the processor, as well as their representatives, where they are designated, shall be obliged to make the records referred to in paragraphs 1, 3, 4 and 6 of this Article available to the Commissioner, at their request.	Functional	Intersects With	Documenting Data Processing Activities	PRI-14	Mechanisms exist to document Personal Data (PD) processing activities that covers collection, receiving, processing, storage, transmission, sharing, updating and/or disposal actions with sufficient detail to demonstrate conformity with applicable statutory, regulatory and contractual requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.1.47-4(1)	Records of Processing Activities	the name and contact details of each processor and each controller on behalf of which processing is performed, and/or the data protection officer, where they are designated;	Functional	Intersects With	Documenting Data Processing Activities	PRI-14	Mechanisms exist to document Personal Data (PD) processing activities that covers collection, receiving, processing, storage, transmission, sharing, updating and/or disposal actions with sufficient detail to demonstrate conformity with applicable statutory, regulatory and contractual requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.1.47-4(2)	Records of Processing Activities	the types of processing performed on behalf of each controller;	Functional	Intersects With	Documenting Data Processing Activities	PRI-14	Mechanisms exist to document Personal Data (PD) processing activities that covers collection, receiving, processing, storage, transmission, sharing, updating and/or disposal actions with sufficient detail to demonstrate conformity with applicable statutory, regulatory and contractual requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.1.47-4(3)	Records of Processing Activities	the transfers of personal data to other countries or international organisations, providing that the controller requires that explicitly, including the name of the country or international organization, where such transfer of personal data is performed;	Functional	Intersects With	Documenting Data Processing Activities	PRI-14	Mechanisms exist to document Personal Data (PD) processing activities that covers collection, receiving, processing, storage, transmission, sharing, updating and/or disposal actions with sufficient detail to demonstrate conformity with applicable statutory, regulatory and contractual requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.1.47-4(4)	Records of Processing Activities	the general description of the safeguards referred to in Article 50, paragraph 1 of this Law, where possible.	Functional	Intersects With	Documenting Data Processing Activities	PRI-14	Mechanisms exist to document Personal Data (PD) processing activities that covers collection, receiving, processing, storage, transmission, sharing, updating and/or disposal actions with sufficient detail to demonstrate conformity with applicable statutory, regulatory and contractual requirements.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.1.47-5	Records of Processing Activities	Provisions of paragraphs 1 and 4 of this Article shall not apply to the economic operators and organisations employing less than 250 persons, except where:	Functional	No Relationship	N/A	N/A	N/A	0	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.1.47-5(1)	Records of Processing Activities	the processing that they perform can result in a high risk to the rights and freedoms of the data subjects;	Functional	No Relationship	N/A	N/A	N/A	0	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.1.47-5(2)	Records of Processing Activities	the processing is not occasional;	Functional	No Relationship	N/A	N/A	N/A	0	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.1.47-5(3)	Records of Processing Activities	the processing includes special types of personal data as referred to in Article 17, paragraph 1 of this Law or personal data relating to criminal convictions, punishable offences and safeguards referred to in Article 19 of this Law.	Functional	No Relationship	N/A	N/A	N/A	0	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.1.48	Recording of Processing Activities Performed by the Competent Authorities for Special Purposes	The competent authority which is processing data for special purposes shall be obliged to ensure that on the occasion of the use of system for automatic processing, at least the following processing activities are recorded in such system: entry, alteration, inspection, disclosure, including transfer, comparison and erasure. Recording of inspection and disclosure of personal data must enable determining the reasons for performing the processing activities, date and time of processing activities and, where possible, identity of the person performing inspection or disclosing the personal data, as well as the identity of the recipient of such data. The recording referred to in paragraph 1 of this Article can only be used for the purpose of assessment of lawfulness of the processing, internal supervision, ensuring data integrity and safety of data, as well as initiating and conducting criminal proceedings. The record created by means of recording referred to in paragraph 1 of this Article shall be made available to the Commissioner for inspection, at their request.	Functional	No Relationship	N/A	N/A	N/A	0	
IV.1.49	Cooperation with the Commissioner	The controller, processor and their representatives, where they are designated, shall cooperate with the Commissioner in the performance of his powers.	Functional	Intersects With	Statutory, Regulatory & Contractual Compliance	CPL-01	Mechanisms exist to facilitate the identification and implementation of relevant statutory, regulatory and contractual controls.	5	
IV.2	Security of Personal Data	N/A	Functional	No Relationship	N/A	N/A	N/A	0	

FDE #	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes
IV.2.50	Security of Personal Data	In accordance with the level of technological achievements and the costs of implementation thereof, the nature, scope, circumstances and purposes of processing, as well as the likelihood of the occurrence of risks and the level of risk to the rights and freedoms of natural persons, the controller and the processor shall implement appropriate technical, organisational and staff-related measures to achieve a level of security appropriate to the risk. As appropriate, the measures referred to in paragraph 1 of this Article shall in particular include: When assessing the appropriate level of security referred to in paragraph 1 of this Article, account shall in particular be taken of the risks that are presented by processing, in particular from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored or otherwise processed. Application of an approved code of conduct as referred to in Article 59 of this Law, and/or an issued certificate as referred to in Article 61 may be used for demonstrating compliance with the obligations referred to in paragraph 1 of this Article. The controller and the processor shall be obliged to take measures with the aim of ensuring that any natural person authorized to access personal data by the controller or the processor processes such data on the order of the controller or if he or she is required to do so by the law. Provisions of paragraphs 1 through 5 of this Article shall not apply to the processing carried out by the competent authorities for special purposes.	Functional	Intersects With	Security of Personal Data (PD)	PRI-01.6	Mechanisms exist to ensure Personal Data (PD) is protected by logical and physical security safeguards that are sufficient and appropriately scoped to protect the confidentiality and integrity of the PD.	5	
IV.2.50(1)	Security of Personal Data	the pseudonymisation and encryption of personal data;	Functional	Intersects With	De-Identification (Anonymization)	DCH-23	Mechanisms exist to anonymize data by removing Personal Data (PD) from datasets.	5	
IV.2.50(2)	Security of Personal Data	the ability to ensure durable confidentiality, integrity, availability and resilience of processing systems and processing services;	Functional	Intersects With	Security of Personal Data (PD)	PRI-01.6	Mechanisms exist to ensure Personal Data (PD) is protected by logical and physical security safeguards that are sufficient and appropriately scoped to protect the confidentiality and integrity of the PD.	5	
IV.2.50(3)	Security of Personal Data	ensuring restoring of the availability and access to personal data in the event of a physical or technical incident within the shortest time possible; 38	Functional	Intersects With	Security of Personal Data (PD)	PRI-01.6	Mechanisms exist to ensure Personal Data (PD) is protected by logical and physical security safeguards that are sufficient and appropriately scoped to protect the confidentiality and integrity of the PD.	5	
IV.2.50(4)	Security of Personal Data	the procedure of regular testing, assessing and evaluating the effectiveness of technical, organisational and staff-related measures for security of the processing.	Functional	Intersects With	Security of Personal Data (PD)	PRI-01.6	Mechanisms exist to ensure Personal Data (PD) is protected by logical and physical security safeguards that are sufficient and appropriately scoped to protect the confidentiality and integrity of the PD.	5	
IV.2.51	Security of Processing Performed by the Competent Authorities for Special Purposes	Where the processing is performed by the competent authorities for special purpose, and in accordance with the level of technological achievements and the costs of the application thereof, the nature, scope, circumstances and the purpose of processing, as well as the likelihood of the occurrence of risks and the level of risk to the rights and freedoms of natural persons, the controller and the processor shall implement adequate technical, organisational and staff-related measures to achieve an adequate level of security appropriate to the risk, in particular in cases of processing of special types of personal data as referred to in Article 18 of this Law. Based on the assessment of risk, the controller of the processor shall be obliged to, in automatic processing, implement adequate measures referred to in paragraph 1 of this Article which shall ensure that:	Functional	Intersects With	Security of Personal Data (PD)	PRI-01.6	Mechanisms exist to ensure Personal Data (PD) is protected by logical and physical security safeguards that are sufficient and appropriately scoped to protect the confidentiality and integrity of the PD.	5	
IV.2.51(1)	Security of Processing Performed by the Competent Authorities for Special Purposes	access to the equipment used for processing is rendered impossible to any unauthorized person ("control of access to the equipment");	Functional	Intersects With	Security of Personal Data (PD)	PRI-01.6	Mechanisms exist to ensure Personal Data (PD) is protected by logical and physical security safeguards that are sufficient and appropriately scoped to protect the confidentiality and integrity of the PD.	5	
IV.2.51(2)	Security of Processing Performed by the Competent Authorities for Special Purposes	unauthorized reading, copying, change or removal of medium is prevented ("medium control");	Functional	Intersects With	Security of Personal Data (PD)	PRI-01.6	Mechanisms exist to ensure Personal Data (PD) is protected by logical and physical security safeguards that are sufficient and appropriately scoped to protect the confidentiality and integrity of the PD.	5	
IV.2.51(3)	Security of Processing Performed by the Competent Authorities for Special Purposes	unauthorized entering of personal data, as well as any unauthorized modification, erasure and control of the stored personal data is prevented ("storage control");	Functional	Intersects With	Security of Personal Data (PD)	PRI-01.6	Mechanisms exist to ensure Personal Data (PD) is protected by logical and physical security safeguards that are sufficient and appropriately scoped to protect the confidentiality and integrity of the PD.	5	
IV.2.51(4)	Security of Processing Performed by the Competent Authorities for Special Purposes	the use of automatic processing system by any unauthorized person is prevented, by using data transfer equipment ("usage control");	Functional	Intersects With	Security of Personal Data (PD)	PRI-01.6	Mechanisms exist to ensure Personal Data (PD) is protected by logical and physical security safeguards that are sufficient and appropriately scoped to protect the confidentiality and integrity of the PD.	5	
IV.2.51(5)	Security of Processing Performed by the Competent Authorities for Special Purposes	the person authorized to use the system for automatic processing has access only to the personal data covered by their authorisation for access to data is ensured ("control of access to data");	Functional	Intersects With	Security of Personal Data (PD)	PRI-01.6	Mechanisms exist to ensure Personal Data (PD) is protected by logical and physical security safeguards that are sufficient and appropriately scoped to protect the confidentiality and integrity of the PD.	5	
IV.2.51(6)	Security of Processing Performed by the Competent Authorities for Special Purposes	they may check and/or determine to whom personal data has been transferred, may be transferred or made available, by using the equipment for data transfer ("transfer control");	Functional	Intersects With	Security of Personal Data (PD)	PRI-01.6	Mechanisms exist to ensure Personal Data (PD) is protected by logical and physical security safeguards that are sufficient and appropriately scoped to protect the confidentiality and integrity of the PD.	5	
IV.2.51(7)	Security of Processing Performed by the Competent Authorities for Special Purposes	they may subsequently check and/or determine which pieces of personal data have been entered in the system for automatic processing, by which person and when ("entry control");	Functional	Intersects With	Security of Personal Data (PD)	PRI-01.6	Mechanisms exist to ensure Personal Data (PD) is protected by logical and physical security safeguards that are sufficient and appropriately scoped to protect the confidentiality and integrity of the PD.	5	
IV.2.51(8)	Security of Processing Performed by the Competent Authorities for Special Purposes	unauthorized reading, copying, modification or erasure of personal data in the course of transfer thereof or in the course of transportation of the medium is prevented ("transport control");	Functional	Intersects With	Security of Personal Data (PD)	PRI-01.6	Mechanisms exist to ensure Personal Data (PD) is protected by logical and physical security safeguards that are sufficient and appropriately scoped to protect the confidentiality and integrity of the PD.	5	
IV.2.51(9)	Security of Processing Performed by the Competent Authorities for Special Purposes	the installed system is restored in a case of any interruption of operation thereof ("system restoration");	Functional	Intersects With	Security of Personal Data (PD)	PRI-01.6	Mechanisms exist to ensure Personal Data (PD) is protected by logical and physical security safeguards that are sufficient and appropriately scoped to protect the confidentiality and integrity of the PD.	5	
IV.2.51(10)	Security of Processing Performed by the Competent Authorities for Special Purposes	proper operation of the system and regular reporting of system operation errors are ensured ("reliability"), as well as that the personal data stored cannot be jeopardized due to any deficiencies in system operation ("integrity").	Functional	Intersects With	Security of Personal Data (PD)	PRI-01.6	Mechanisms exist to ensure Personal Data (PD) is protected by logical and physical security safeguards that are sufficient and appropriately scoped to protect the confidentiality and integrity of the PD.	5	
IV.2.52	Notification of a Personal Data Breach to the Commissioner	The controller shall be obliged to notify the Commissioner of the breach of personal data that can result in a risk to the rights and freedoms of natural persons without undue delay, or, where possible, within 72 hours after having become aware of the breach. Where the controller does not act within 72 hours after having become aware of the breach, they shall be obliged to provide an explanation of the reasons for not having acted within such time limit. The processor shall be obliged to, after becoming aware of a personal data breach, notify the controller of such breach without undue delay. The notification referred to in paragraph 1 of this Article must at least include the following pieces of information: Where complete information referred to in paragraph 4 of this Article cannot be provided at the same time, the controller shall provide available information without undue delay in phases. The controller shall be obliged to document each personal data breach, including the facts relating to the personal data breach, its effects and the remedial action taken. The documentation referred to in paragraph 6 of this Article shall enable the Commissioner to determine whether or not the controller has acted in compliance with the provisions of this Article. In case of a breach of personal data processed by the competent authorities for special purposes, which is transferred to the controller in another country or an international organisation, the controller shall be obliged to without undue delay provide information referred to in paragraph 4 of this Article to the controller in such other country or international organisation, in compliance with the international agreement. The Commissioner shall prescribe the form for the notification referred to in paragraph 1 of this Article and shall regulate the notification method in more detail.	Functional	Intersects With	Incident Stakeholder Reporting	IRO-10	Mechanisms exist to timely-report incidents to applicable: (1) Internal stakeholders; (2) Affected clients & third-parties; and (3) Regulatory authorities.	5	

FDE #	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes
IV.2.52(1)	Notification of a Personal Data Breach to the Commissioner	the description of the nature of the personal data breach, including the types of data and the approximate number of data subjects concerned where possible, as well as the approximate number of personal data pieces the security of which has been breached;	Functional	Intersects With	Incident Stakeholder Reporting	IRO-10	Mechanisms exist to timely-report incidents to applicable: (1) Internal stakeholders; (2) Affected clients & third-parties; and (3) Regulatory authorities.	5	
IV.2.52(2)	Notification of a Personal Data Breach to the Commissioner	the name and contact details of the data protection officer or information on any other possible method of obtaining information on the breach;	Functional	Intersects With	Incident Stakeholder Reporting	IRO-10	Mechanisms exist to timely-report incidents to applicable: (1) Internal stakeholders; (2) Affected clients & third-parties; and (3) Regulatory authorities.	5	
IV.2.52(3)	Notification of a Personal Data Breach to the Commissioner	a description of the possible consequences of the breach;	Functional	Intersects With	Incident Stakeholder Reporting	IRO-10	Mechanisms exist to timely-report incidents to applicable: (1) Internal stakeholders; (2) Affected clients & third-parties; and (3) Regulatory authorities.	5	
IV.2.52(4)	Notification of a Personal Data Breach to the Commissioner	a description of the measures taken or proposed to be taken by the controller relating to the personal data breach, including measures taken to mitigate its possible adverse effects.	Functional	Intersects With	Incident Stakeholder Reporting	IRO-10	Mechanisms exist to timely-report incidents to applicable: (1) Internal stakeholders; (2) Affected clients & third-parties; and (3) Regulatory authorities.	5	
IV.2.53	Communication of a Personal Data Breach to the Data Subject	Where the personal data breach may result in a high risk to the rights and freedoms of natural persons, the controller shall communicate the personal data breach to the data subject without undue delay. In the communication referred to in paragraph 1 of this Article, the controller shall be obliged to describe in clear and plain language the nature of the personal data breach and to state at least the information referred to in Article 52, paragraph 4, items 2) through 4) of this Law. The controller shall not be obliged to notify the person referred to in paragraph 1 of this Article where: If the controller has not communicated the personal data breach to the data subject, the Commissioner may, having considered the potential that the personal data breach result in a high risk, require the controller to do so or may determine that the conditions referred to in paragraph 3 of this Article are met. Where it is a case of a breach of personal data processed by the competent authorities for special purposes, the controller may postpone or restrict the communication of the data subject, in compliance with the conditions and on the grounds of the reasons referred to in Article 25, paragraph 3 of this Law.	Functional	Intersects With	Incident Stakeholder Reporting	IRO-10	Mechanisms exist to timely-report incidents to applicable: (1) Internal stakeholders; (2) Affected clients & third-parties; and (3) Regulatory authorities.	5	
IV.3	Data Protection Impact Assessment and Prior Consultation with the Commissioner	N/A	Functional	No Relationship	N/A	N/A	N/A	0	
IV.3.54-1	Data Protection Impact Assessment	Where a type of processing in particular using new technologies, and taking into account the nature, scope, circumstances and purposes of the processing, is likely to result in a high risk to the rights and freedoms of natural persons, the controller shall, prior to commence the processing, carry out an assessment of the impact of the envisaged processing operations on the protection of personal data. A single assessment may be carried out where a number of similar processing operations may present similar high risks for the protection of personal data. When carrying out a data protection impact assessment, the controller shall be obliged to seek the opinion from the data protection officer, where such officer is designated. The data protection impact assessment referred to in paragraph 1 of this Article shall mandatorily be performed in the case of: The Commissioner shall be obliged to draw up and to make public on their website a list of the kinds of processing operations which are subject to the requirement for a data protection impact assessment referred to in paragraph 1 of this Article and they may additionally make public a list of the kinds of processing activities for which no data protection impact assessment is required.	Functional	Intersects With	Data Protection Impact Assessment (DPIA)	RSK-10	Mechanisms exist to conduct a Data Protection Impact Assessment (DPIA) on Technology Assets, Applications and/or Services (TAAS) that store, process and/or transmit Personal Data (PD) to identify and remediate reasonably-expected risks.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.3.54-1(1)	Data Protection Impact Assessment	a systematic and comprehensive evaluation of the position and characteristics of the natural person which is carried out by automated processing of personal data, including profiling, and based on which decisions are made which are of significance for the legal position of the individual or similarly significantly affecting them;	Functional	Intersects With	Data Protection Impact Assessment (DPIA)	RSK-10	Mechanisms exist to conduct a Data Protection Impact Assessment (DPIA) on Technology Assets, Applications and/or Services (TAAS) that store, process and/or transmit Personal Data (PD) to identify and remediate reasonably-expected risks.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.3.54-1(2)	Data Protection Impact Assessment	processing of special types of personal data referred to in Article 17, paragraph 1 and Article 18, paragraph 1 or of personal data relating to criminal convictions and punishable offences referred to in Article 19 of this Law, on a large scale;	Functional	Intersects With	Data Protection Impact Assessment (DPIA)	RSK-10	Mechanisms exist to conduct a Data Protection Impact Assessment (DPIA) on Technology Assets, Applications and/or Services (TAAS) that store, process and/or transmit Personal Data (PD) to identify and remediate reasonably-expected risks.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.3.54-1(3)	Data Protection Impact Assessment	a systematic monitoring of a publicly accessible area on a large scale.	Functional	Intersects With	Data Protection Impact Assessment (DPIA)	RSK-10	Mechanisms exist to conduct a Data Protection Impact Assessment (DPIA) on Technology Assets, Applications and/or Services (TAAS) that store, process and/or transmit Personal Data (PD) to identify and remediate reasonably-expected risks.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.3.54-2	Data Protection Impact Assessment	The assessment must contain at least: Paragraph 6 of this Article shall not apply to the impact assessment of the processing carried out by the competent authorities for special purposes. The impact assessment of the processing carried out by the competent authorities for special purposes shall at least include a comprehensive description of the envisaged processing operations, an assessment of the risks to the rights and freedoms of the data subjects, a description of measures intended to be taken to address the risks, including the safeguards, as well as the technical, organisational and staff-related measures to ensure personal data protection and to provide proof of compliance with the provisions of this Law, taking into account the rights and legitimate interests of the data subjects and other persons concerned. Compliance with the approved code of conduct referred to in Article 59 of this Law by the relevant controllers or processors must be taken into due account in assessing the impact of the processing operations performed on the protection of personal data. Paragraph 9 of this Article shall not apply to the processing carried out by the competent authorities for special purposes. Where appropriate, the controller shall seek the views of data subjects or their representatives on the intended processing operations, without prejudice to the protection of commercial or public interests or the security of processing operations. Where a separate law prescribes individual processing operations and/or groups of processing operations, and the processing is performed in compliance with Article 12, paragraph 1, item 3) or item 5) of this Law, and the personal data protection impact assessment has already been carried out as part of a general impact assessment on the occasion of the adoption of that law, paragraphs 1 through 9 of this Article shall not apply, unless where it is determined that it is necessary to carry out another such assessment. Where necessary, and at least in the case of a change in the risk levels concerning the processing operations, the controller shall be obliged to carry out a review	Functional	Intersects With	Data Protection Impact Assessment (DPIA)	RSK-10	Mechanisms exist to conduct a Data Protection Impact Assessment (DPIA) on Technology Assets, Applications and/or Services (TAAS) that store, process and/or transmit Personal Data (PD) to identify and remediate reasonably-expected risks.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.3.54-2(1)	Data Protection Impact Assessment	a comprehensive list of the envisaged processing operations and the purposes of the processing, including the description of the legitimate interest pursued by the controller, where applicable;	Functional	Intersects With	Data Protection Impact Assessment (DPIA)	RSK-10	Mechanisms exist to conduct a Data Protection Impact Assessment (DPIA) on Technology Assets, Applications and/or Services (TAAS) that store, process and/or transmit Personal Data (PD) to identify and remediate reasonably-expected risks.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.3.54-2(2)	Data Protection Impact Assessment	an assessment of the necessity and proportionality of the processing operations in relation to the purposes of the processing;	Functional	Intersects With	Data Protection Impact Assessment (DPIA)	RSK-10	Mechanisms exist to conduct a Data Protection Impact Assessment (DPIA) on Technology Assets, Applications and/or Services (TAAS) that store, process and/or transmit Personal Data (PD) to identify and remediate reasonably-expected risks.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.3.54-2(3)	Data Protection Impact Assessment	an assessment of the risks to the rights and freedoms of data subjects referred to in paragraph 1 of this Article;	Functional	Intersects With	Data Protection Impact Assessment (DPIA)	RSK-10	Mechanisms exist to conduct a Data Protection Impact Assessment (DPIA) on Technology Assets, Applications and/or Services (TAAS) that store, process and/or transmit Personal Data (PD) to identify and remediate reasonably-expected risks.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.

FDE #	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes
IV.3.54-2(4)	Data Protection Impact Assessment	a description of the measures intended to be taken in relation to the existence of the risks, including safeguards, as well as the technical, organizational and staff-related measures to ensure the protection of personal data and to provide proof of the compliance with the provisions of this Law, taking into account the rights and legitimate interests of data subjects and other persons concerned.	Functional	Intersects With	Data Protection Impact Assessment (DPIA)	RSK-10	Mechanisms exist to conduct a Data Protection Impact Assessment (DPIA) on Technology Assets, Applications and/or Services (TAAS) that store, process and/or transmit Personal Data (PD) to identify and remediate reasonably-expected risks.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.3.55-1	Prior Consultation with the Commissioner	Where the data protection impact assessment, which has been carried out in compliance with Article 54 of this Law, indicates that the intended processing operations will result in a high risk in the absence of measures taken to mitigate the risk, the controller shall be obliged to consult the Commissioner prior to commencing the processing operation. Paragraph 1 of this Article shall not apply to the processing carried out by the competent authorities for special purposes. Where the processing is performed by the competent authority for special purposes, the controller and/or the processor shall be obliged to consult with the Commissioner prior to commencing the processing operations which will result in the creation of a filing system of data in case that: Where the Commissioner is of the opinion that infringements of the provisions of this Law could be caused by the intended processing operations referred to in paragraphs 1 and 3 of this Article, and in particular where the controller has insufficiently identified or mitigated, the Commissioner shall be obliged to, within 60 days from the date of receipt of the request, provide written advice to the controller or to the processor, where they has submitted the request, as well as to, where necessary, exercise the powers referred to in Article 79 of this Law. The time limit referred to in paragraph 4 of this Article can be extended by 45 days taking into account the complexity of the intended processing operations, and the Commissioner shall be obliged to inform the controller or the processor, where they has submitted the request, of the postponement and of the reasons for postponement of advice, within 30 days from the date of receipt of the request for consultation. The time limits referred to in paragraphs 4 and 5 of this Article shall stay until the Commissioner has obtained complete information requested which is necessary for providing an opinion.	Functional	Intersects With	Data Protection Impact Assessment (DPIA)	RSK-10	Mechanisms exist to conduct a Data Protection Impact Assessment (DPIA) on Technology Assets, Applications and/or Services (TAAS) that store, process and/or transmit Personal Data (PD) to identify and remediate reasonably-expected risks.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.3.55-1(1)	Prior Consultation with the Commissioner	the data protection impact assessment, which has been carried out in compliance with Article 54 of this Law, indicates that the intended processing activities will result in a high risk in the absence of measures taken to mitigate the risk;	Functional	Intersects With	Data Protection Impact Assessment (DPIA)	RSK-10	Mechanisms exist to conduct a Data Protection Impact Assessment (DPIA) on Technology Assets, Applications and/or Services (TAAS) that store, process and/or transmit Personal Data (PD) to identify and remediate reasonably-expected risks.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.3.55-1(2)	Prior Consultation with the Commissioner	the kind of processing, and in particular where new technologies, safeguards or procedures are applied, present a high risk to the rights and persons of the data subjects.	Functional	Intersects With	Data Protection Impact Assessment (DPIA)	RSK-10	Mechanisms exist to conduct a Data Protection Impact Assessment (DPIA) on Technology Assets, Applications and/or Services (TAAS) that store, process and/or transmit Personal Data (PD) to identify and remediate reasonably-expected risks.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.3.55-2	Prior Consultation with the Commissioner	Enclosed with the request for consultation, the controller shall be obliged to provide to the Commissioner information on: Paragraph 7 of this Article shall not apply to the processing carried out by the competent authorities for special purposes. Where the processing is carried out by the competent authority for special purposes, the controller referred to in paragraph 3 of this Article shall be obliged to provide to the Commissioner information on impact assessment on the protection of personal data referred to in Article 54 of this Law, and at the request of the Commissioner other pieces of information of significance for their advice on the processing operations as well, in particular on the risk to the protection of personal data of the data subject and on the safeguards for their rights. The Commissioner may additionally draw up and make public on their website the list of processing operations concerning which consultations must be requested. The public authorities proposing adoption of the laws and legal regulations based on the laws, which include provisions on processing of personal data, shall be obliged to request consultations with the Commissioner in the course of preparation thereof.	Functional	Intersects With	Data Protection Impact Assessment (DPIA)	RSK-10	Mechanisms exist to conduct a Data Protection Impact Assessment (DPIA) on Technology Assets, Applications and/or Services (TAAS) that store, process and/or transmit Personal Data (PD) to identify and remediate reasonably-expected risks.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.3.55-2(1)	Prior Consultation with the Commissioner	the respective responsibilities of the controller and, where applicable, of the joint controllers and processors involved in the processing, in particular for processing performed within a group of economic operators;	Functional	Intersects With	Data Protection Impact Assessment (DPIA)	RSK-10	Mechanisms exist to conduct a Data Protection Impact Assessment (DPIA) on Technology Assets, Applications and/or Services (TAAS) that store, process and/or transmit Personal Data (PD) to identify and remediate reasonably-expected risks.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.3.55-2(2)	Prior Consultation with the Commissioner	the purposes and means of the intended processing;	Functional	Intersects With	Data Protection Impact Assessment (DPIA)	RSK-10	Mechanisms exist to conduct a Data Protection Impact Assessment (DPIA) on Technology Assets, Applications and/or Services (TAAS) that store, process and/or transmit Personal Data (PD) to identify and remediate reasonably-expected risks.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.3.55-2(3)	Prior Consultation with the Commissioner	the technical, organisational and staff-related measures, as well as on the safeguards for the rights and freedoms of the data subjects in compliance with this Law;	Functional	Intersects With	Data Protection Impact Assessment (DPIA)	RSK-10	Mechanisms exist to conduct a Data Protection Impact Assessment (DPIA) on Technology Assets, Applications and/or Services (TAAS) that store, process and/or transmit Personal Data (PD) to identify and remediate reasonably-expected risks.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.3.55-2(4)	Prior Consultation with the Commissioner	the contact details of the data protection officer, where designated;	Functional	Intersects With	Data Protection Impact Assessment (DPIA)	RSK-10	Mechanisms exist to conduct a Data Protection Impact Assessment (DPIA) on Technology Assets, Applications and/or Services (TAAS) that store, process and/or transmit Personal Data (PD) to identify and remediate reasonably-expected risks.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.3.55-2(5)	Prior Consultation with the Commissioner	the data protection impact assessment provided for in Article 54 of this Law;	Functional	Intersects With	Data Protection Impact Assessment (DPIA)	RSK-10	Mechanisms exist to conduct a Data Protection Impact Assessment (DPIA) on Technology Assets, Applications and/or Services (TAAS) that store, process and/or transmit Personal Data (PD) to identify and remediate reasonably-expected risks.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.3.55-2(6)	Prior Consultation with the Commissioner	any other information requested by the Commissioner.	Functional	Intersects With	Data Protection Impact Assessment (DPIA)	RSK-10	Mechanisms exist to conduct a Data Protection Impact Assessment (DPIA) on Technology Assets, Applications and/or Services (TAAS) that store, process and/or transmit Personal Data (PD) to identify and remediate reasonably-expected risks.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
IV.4	Data Protection Officer	N/A	Functional	No Relationship	N/A	N/A	N/A	0	

FDE #	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes
IV.4.56	Designation	The controller and the processor may designate a data protection officer. The controller and the processor shall be obliged to designate a data protection officer where: Provisions of paragraphs 1 and 2 of this Article shall not apply to the processing of the competent authorities for special purposes. Where the processing is performed by the competent authorities for special purpose, the controller shall be obliged to designate a data protection officer, except in the case of data processing performed by the courts for the purpose of exercising of their judicial powers. A group of economic operators may designate a joint data protection officer, on condition that such person shall be equally available to each member of the group. Where the controllers or the processors are public authorities or competent authorities, a single data protection officer may be designated, taking account of the organisational structure and size of such public authorities. A separate law may prescribe that the controllers and/or the processors or their associations that are representing them, must designate a data protection officer. The data protection officer shall be designated on the basis of their professional qualities and, in particular, their expert knowledge and experience in the field of protection of personal data, as well as the ability to fulfil the obligations referred to in Article 58 of this Law. The data protection officer may be employed with the controller or processor, or may fulfil the tasks on the basis of a service contract. The controller or the processor shall publish the contact details of the data protection officer and provide them to the Commissioner. The Commissioner shall maintain the records of the data protection officers which shall include: the names and surnames of the data protection officers, their contact details, as well as the names and contact details of the controller and/or the processor. The Commissioner shall prescribe the form of the records referred to in paragraph 11 of this Article and shall regulate the method of maintain it.	Functional	Intersects With	Data Protection Officer (DPO)	PRI-01.4	Mechanisms exist to appoint a Data Protection Officer (DPO): (1) Based on professional qualifications; and (2) To be involved in all issues related to how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed.	5	
IV.4.56(1)	Designation	the processing is carried out by a public authority, except for the processing performed by the court for the purpose of exercising their judicial powers;	Functional	Intersects With	Data Protection Officer (DPO)	PRI-01.4	Mechanisms exist to appoint a Data Protection Officer (DPO): (1) Based on professional qualifications; and (2) To be involved in all issues related to how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed.	5	
IV.4.56(2)	Designation	the core activities of the controller or the processor consist of processing operations which, by virtue of their nature, their scope and/or their purposes, require regular and systematic monitoring of data subjects on a large scale;	Functional	Intersects With	Data Protection Officer (DPO)	PRI-01.4	Mechanisms exist to appoint a Data Protection Officer (DPO): (1) Based on professional qualifications; and (2) To be involved in all issues related to how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed.	5	
IV.4.56(3)	Designation	the core activities of the controller or the processor consist of processing on a large scale of special types of personal data in compliance with Article 17, paragraph 1 or personal data relating to criminal convictions and offences referred to in Article 19 of this Law.	Functional	Intersects With	Data Protection Officer (DPO)	PRI-01.4	Mechanisms exist to appoint a Data Protection Officer (DPO): (1) Based on professional qualifications; and (2) To be involved in all issues related to how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed.	5	
IV.4.57	Position of the Data Protection Officer	The controller and the processor shall be obliged to ensure that the data protection officer is involved, properly and in a timely manner, in all tasks which relate to the protection of personal data. The controller and processor shall be obliged to enable the data protection officer to perform the tasks referred to in Article 58 by providing resources necessary to carry out those obligations, access to personal data and processing operations, as well as their specialist training. The controller and processor shall ensure that the data protection officer is independent regarding the exercise of their obligations. The controller or the processor may not penalize the data protection officer or terminate the employment, and/or the service contract with them due to the performance of obligations referred to in Article 58 of this Law. For the performance of obligations referred to in Article 58 of this Law the data protection officer shall report directly to the manager of the controller or the processor. Data subjects may contact the data protection officer with regard to all issues related to processing of their personal data, as well as to the exercise of their rights prescribed by this Law. The data protection officer shall be bound by secrecy or confidentiality concerning the performance of his or her obligations referred to in Article 58 of this Law, in accordance with the law. The data protection officer may fulfil other tasks and duties, and the controller or processor shall be obliged to ensure that the performance of any such tasks and duties do not result in a conflict of interests for the data protection officer. Where the controllers are competent authorities which are carrying out the processing for special purposes, provisions of paragraphs 1 through 5 and 8 of this Article shall not apply to the processor.	Functional	Intersects With	Data Protection Officer (DPO)	PRI-01.4	Mechanisms exist to appoint a Data Protection Officer (DPO): (1) Based on professional qualifications; and (2) To be involved in all issues related to how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed.	5	
IV.4.58	Obligations of the Data Protection Officer	The data protection officer shall have at least the obligation to: The data protection officer shall in the performance of his or her obligations have due regard to the risk associated with processing operations, taking into account the nature, scope, circumstances and purposes of processing. Where the controllers are the competent authorities performing processing for special purposes, provisions of paragraph 1, items 1) and 2) of this Article shall not apply to the processor.	Functional	Intersects With	Data Protection Officer (DPO)	PRI-01.4	Mechanisms exist to appoint a Data Protection Officer (DPO): (1) Based on professional qualifications; and (2) To be involved in all issues related to how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed.	5	
IV.4.58(1)	Obligations of the Data Protection Officer	inform and advise the controller or the processor as well as the employees who carry out processing operations of their legal obligations with regard to the protection of personal data;	Functional	Intersects With	Data Protection Officer (DPO)	PRI-01.4	Mechanisms exist to appoint a Data Protection Officer (DPO): (1) Based on professional qualifications; and (2) To be involved in all issues related to how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed.	5	
IV.4.58(2)	Obligations of the Data Protection Officer	monitor implementation of the provisions of this Law, other laws and internal regulations of the controller or processor in relation to the protection of personal data, including the issues of assignment of responsibilities, awareness raising and training of employees participating in the processing operations, as well as audits;	Functional	Intersects With	Data Protection Officer (DPO)	PRI-01.4	Mechanisms exist to appoint a Data Protection Officer (DPO): (1) Based on professional qualifications; and (2) To be involved in all issues related to how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed.	5	
IV.4.58(3)	Obligations of the Data Protection Officer	provide advice, where requested, as regards the data protection impact assessment and monitor the actions conducted based on such assessment in compliance with Article 54 of this Law;	Functional	Intersects With	Data Protection Officer (DPO)	PRI-01.4	Mechanisms exist to appoint a Data Protection Officer (DPO): (1) Based on professional qualifications; and (2) To be involved in all issues related to how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed.	5	
IV.4.58(4)	Obligations of the Data Protection Officer	cooperate with the Commissioner, act as a contact point for cooperation with the Commissioner and consult with them in relation to the issues relating to processing, including notification and acquiring opinions referred to in Article 55 of this Law.	Functional	Intersects With	Data Protection Officer (DPO)	PRI-01.4	Mechanisms exist to appoint a Data Protection Officer (DPO): (1) Based on professional qualifications; and (2) To be involved in all issues related to how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed.	5	
IV.5	Code of Conduct and Issuing of Certificates	N/A	Functional	No Relationship	N/A	N/A	N/A	0	

FDE #	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes
IV.5.59	Code of Conduct and Issuing of Certificates	Associations and other entities representing groups of controllers or processors may draw up codes of conduct for the purpose of more efficient implementation of this Law, in particular in respect of: The controllers and/or the processors to which this Law does not apply, with the aim of providing for appropriate safeguards for the data subjects in the transfer of their personal data to other countries or international organisations based on Article 65, paragraph 2, item 3) of this Law, may accept or undertake to apply the code of conduct approved in compliance with paragraph 5 of this Article, by means of contractual or other legally binding acts whereby they undertake to apply such safeguards, in particular regarding the rights of the data subjects. A code of conduct referred to in paragraph 1 of this Article shall mandatorily contain provisions which enable the person referred to in Article 60, paragraph 1 of this Law to carry out the monitoring of implementation of the code by the controllers or processors which undertake to apply it, which shall be without prejudice to the inspection and other tasks and powers of the Commissioner referred to in Articles 77 through 79 of this Law. The associations and other entities referred to in paragraph 1 of this Article intending to draw up a code of conduct or to amend an existing code of conduct shall be obliged to deliver the draft code or any amendments thereto to the Commissioner for opinion. The Commissioner shall provide an opinion on the compliance of the draft code of conduct or the amendments thereto with the provisions of this Law, and where they determines that the draft code of conduct includes sufficient guarantees for the protection of personal data, the code of conduct or the amendment thereto shall be registered and made public on their website. Provisions of paragraphs 1 through 5 of this Article shall not apply to the processing carried out by the competent authorities for special purposes.	Functional	No Relationship	N/A	N/A	N/A	0	
IV.5.59(1)	Code of Conduct and Issuing of Certificates	fair and transparent processing;	Functional	No Relationship	N/A	N/A	N/A	0	
IV.5.59(2)	Code of Conduct and Issuing of Certificates	the legitimate interests of the controllers, taking into account the circumstances of concrete cases;	Functional	No Relationship	N/A	N/A	N/A	0	
IV.5.59(3)	Code of Conduct and Issuing of Certificates	the collection of personal data;	Functional	No Relationship	N/A	N/A	N/A	0	
IV.5.59(4)	Code of Conduct and Issuing of Certificates	the pseudonymisation of personal data;	Functional	No Relationship	N/A	N/A	N/A	0	
IV.5.59(5)	Code of Conduct and Issuing of Certificates	the information provided to the public and to data subjects;	Functional	No Relationship	N/A	N/A	N/A	0	
IV.5.59(6)	Code of Conduct and Issuing of Certificates	the exercise of the rights of data subjects;	Functional	No Relationship	N/A	N/A	N/A	0	
IV.5.59(7)	Code of Conduct and Issuing of Certificates	the information provided to underage persons, their protection, as well as the manner in which the consent of the parent exercising parental right is to be obtained;	Functional	No Relationship	N/A	N/A	N/A	0	
IV.5.59(8)	Code of Conduct and Issuing of Certificates	the measures and procedures referred to in Articles 41 and 42 of this Law, as well as the measures aimed at ensuring security of processing referred to in Article 50 of this Law;	Functional	No Relationship	N/A	N/A	N/A	0	
IV.5.59(9)	Code of Conduct and Issuing of Certificates	the notification of personal data breaches to the Commissioner and the communication of such personal data breaches to data subjects;	Functional	No Relationship	N/A	N/A	N/A	0	
IV.5.59(10)	Code of Conduct and Issuing of Certificates	the transfer of personal data to other countries or international organisations;	Functional	No Relationship	N/A	N/A	N/A	0	
IV.5.59(11)	Code of Conduct and Issuing of Certificates	the dispute resolution methods for amicable resolving disputes between controllers and data subjects with regard to processing, without prejudice to exercising of the rights of data subjects referred to in Articles 82 and 84 of this Law.	Functional	No Relationship	N/A	N/A	N/A	0	
IV.5.60	Control of Implementation of the Codes of Conduct	Control of implementation of the code of conduct, in compliance with Article 59, paragraph 3 of this Law, can be performed by the legal person accredited to perform control in compliance with the law regulating accreditation. Conducting of control referred to in paragraph 1 of this Article shall be without prejudice to the inspection and other powers of the Commissioner referred to in Articles 77 through 79 of this Law. The legal person referred to in paragraph 1 of this Article may be accredited only where it has: In a case of breach of a code of conduct by a controller or a processor, the legal person referred to in paragraph 1 of this Article shall take appropriate actions in the prescribed procedure, including a temporary or permanent exclusion of the controller and/or processor from implementation of the code of conduct. The legal person referred to in paragraph 1 of this Article shall be obliged to notify the Commissioner of the actions taken from paragraph 4 of this Article, as well as of the reasons for the imposition thereof. Taking of measures referred to in paragraph 4 of this Article shall be without prejudice to the powers of the Commissioner and application of the provisions of Chapter VII of this Law. Accreditation of the legal person referred to in paragraph 1 of this Article shall be revoked if it is established that it no longer fulfils the conditions for accreditation or where actions taken by the body infringe the provisions of this Law. Provisions of paragraphs 1 through 7 of this Article shall not apply to the public authorities and the processing carried out by the competent authorities for special purposes.	Functional	No Relationship	N/A	N/A	N/A	0	
IV.5.60(1)	Control of Implementation of the Codes of Conduct	demonstrated its independence and expertise in relation to the contents of the code of conduct to the satisfaction of the Commissioner;	Functional	No Relationship	N/A	N/A	N/A	0	
IV.5.60(2)	Control of Implementation of the Codes of Conduct	established procedures which allow it to assess the eligibility of controllers and processors concerned to apply the code, to monitor the controllers' or processors' implementation of the code of conduct as well as to periodically review its effectiveness;	Functional	No Relationship	N/A	N/A	N/A	0	
IV.5.60(3)	Control of Implementation of the Codes of Conduct	established procedure and authority to decide on complaints about infringements of the code of conduct or the manner in which it is being implemented by a controller or processor, as well as ensure transparency of that procedure and authority to the public and data subjects;	Functional	No Relationship	N/A	N/A	N/A	0	
IV.5.60(4)	Control of Implementation of the Codes of Conduct	demonstrated to the satisfaction of the Commissioner that the exercising of their powers cannot result in a conflict of interests.	Functional	No Relationship	N/A	N/A	N/A	0	
IV.5.61	Issuing of Certification	See FDE for details.	Functional	No Relationship	N/A	N/A	N/A	0	
IV.5.62	Certification Bodies	See FDE for details.	Functional	No Relationship	N/A	N/A	N/A	0	
V	TRANSFER OF PERSONAL DATA TO OTHER COUNTRIES AND INTERNATIONAL ORGANISATIONS	N/A	Functional	No Relationship	N/A	N/A	N/A	0	
V.63	General Principles of Transfer	Any transfer of personal data which is undergoing processing or is intended for further processing after transfer to another country or to an international organisation may take place only if, subject to the other provisions of this Law, the conditions laid down in this Chapter of the Law are complied with by the controller and processor, including for onward transfers of personal data from another country or an international organisation to a third country or to another international organisation, in order to ensure an appropriate level of protection of natural persons which is equal to the level guaranteed by this Law. Where the processing is carried out by the competent authorities for special purposes, the transfer of data which is undergoing processing or which is intended for further processing after the transfer thereof to other country or international organisation can be performed only where the following conditions are jointly fulfilled:	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	

FDE #	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes
V.63(1)	General Principles of Transfer	the transfer need to be carried out for special purposes;	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	
V.63(2)	General Principles of Transfer	the personal data is transferred to the controller in another country or international organisation which is a competent authority for carrying out of tasks for special purposes;	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	
V.63(3)	General Principles of Transfer	the Government has determined the list of states, parts of their territories or one or multiple sectors of specified economic activities in those countries and international organisations which are providing an appropriate level of personal data protection in compliance with Article 64 of this Law, and the transfer of data is carried out to one of those countries, to a part of its territory or to one or multiple sectors of a specified economic activity in that country or to an international organisation, or, where this is not a case, the application of appropriate safeguards has been ensured in compliance with Article 65 of this Law, or, where the application thereof has not been ensured, provisions on the transfer of data in special situations from Article 70 of this Law are applied;	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	
V.63(4)	General Principles of Transfer	in a case of further transfer of personal data from another country or international organisation to a third country or international organisation, the competent authority which has performed the first transfer or another competent authority in the Republic of Serbia has approved further transfer, after having taken into account all the circumstances of significance for further transfer, including the gravity of the criminal offence, the purpose of the first transfer and the level of personal data protection in the third country or international organisation to which data is to be transferred further.	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	
V.64	Transfers Subject to Appropriate Protection Levels	Transfer of personal data to another country, into a part of its territory or in one or multiple sectors of specified economic activities in that country or to an international organisation, without prior authorisation, can be performed providing that it has been determined that such other country, part of its territory or one or multiple sectors of specified economic activities in such country or such international organisation has provided appropriate level of protection for personal data. It shall be considered that an appropriate level of protection referred to in paragraph 1 of this Article has been provided in the countries and international organisations which are members to the Convention of the Council of Europe for the Protection of Individuals with regard to Automatic Processing of Personal Data, and/or in the countries, in the parts of their territories or in one or multiple sectors of specified economic activities in such countries or international organisations which have been determined by the European Union to provide appropriate safeguards. The Government may determine that a country, a part of its territory, an activity sector and/or a field of legal regulation or an international organisation does not provide an appropriate level of protection referred to in paragraph 1 of this Article, except in the case of the members of the Convention of the Council of Europe for the Protection of Individuals with regard to Automatic Processing of Personal Data, taking into account: It shall be considered that an appropriate level of protection has been provided where an international agreement has been concluded with another country or international organisation on the transfer of personal data, as well. In the procedure for conclusion of an international agreement on the transfer of personal data compliance with the conditions referred to in paragraph 3 of this Article shall in particular be determined. The Government shall monitor the situation in the field of personal data protection in other countries, in the parts of their territories or in one or multiple sectors of specified activities in such countries or in international organisation, on the basis of available information collected	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	
V.64(1)	Transfers Subject to Appropriate Protection Levels	the principle of the rule of law and respect for the human rights and fundamental freedoms, applicable legislation, including regulations in the field of public security, defence, national security, criminal law and the access of public authorities to personal data, as well as the implementation of such legislation, data protection rules and professional rules in this field and/or taking of measures for the protection of personal data, including rules for the onward transfer of personal data to third countries or international organisation, which are applied in the case-law and practice of other public authorities in another country or international organization, as well as effectiveness of enforceability of data subject rights and in particular effectiveness of administrative and judicial proceedings for the protection of rights of the data subjects whose <u>personal data is being transferred</u> ;	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	
V.64(2)	Transfers Subject to Appropriate Protection Levels	the existence and effective functioning of the supervisory body for the protection of personal data in another country or the supervisory body in charge of supervision over international organisation in this field, with authorization to ensure implementation of the data protection rules and to initiate proceedings for the protection of personal data in cases of noncompliance, to provide assistance and to advise the data subjects in exercising their rights, as well as to cooperate with the supervisory authorities of other countries;	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	
V.64(3)	Transfers Subject to Appropriate Protection Levels	the international commitments the third country or international organisation concerned has undertaken, or other obligations arising from legally binding international treaties or other legal instruments, as well as from its membership in multilateral or regional organisations, in particular in relation to the protection of personal data.	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	
V.65-1	Transfers Subject to Appropriate Safeguards	A controller or processor may transfer personal data to another country, part of its territory or to one or multiple sectors of specified activities in such country or to an international organization for which the existence of an adequate level of protection has not been determined by means of the list referred to in Article 64, paragraph 7 of this Law only where the controller and/or the processor has provided adequate safeguards for such data and on condition that enforceable data subject rights and effective legal remedies for data subjects are ensured. The appropriate safeguards referred to in paragraph 1 of this Article may be provided for, without requiring any specific authorisation from the Commissioner, by:	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
V.65-1(1)	Transfers Subject to Appropriate Safeguards	a legally binding act drawn up between public authorities;	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
V.65-1(2)	Transfers Subject to Appropriate Safeguards	standard data protection clauses drawn up by the Commissioner in compliance with Article 45 of this Law, whereby the legal relation between the controller and the processor is regulated in its entirety;	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
V.65-1(3)	Transfers Subject to Appropriate Safeguards	binding corporate rules, in accordance with Article 67 of this Law;	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
V.65-1(4)	Transfers Subject to Appropriate Safeguards	an approved code of conduct pursuant to Article 59 of this Law, together with binding and enforceable implementation of adequate safeguards, including as regards data subjects' rights, by the controller or processor in another country or international organisation;	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.

FDE #	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes
V.65-1(5)	Transfers Subject to Appropriate Safeguards	issued certificates referred to in Article 61 of this Law, together with commitments undertaken to apply adequate safeguards, including as regards data subjects' rights, by the controllers or processors in another country or international organisation.	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
V.65-2	Transfers Subject to Appropriate Safeguards	Adequate safeguards referred to in paragraph 1 of this Article can additionally be provided for based on a special authorisation of the Commissioner, by: The Commissioner shall grant the authorisation referred to in paragraph 3 of this Article within 60 days from the date of submission of the application for authorisation. Provisions of paragraphs 1 through 4 of this Article shall not apply to the transfer of data processed by the competent authorities for special purposes.	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
V.65-2(1)	Transfers Subject to Appropriate Safeguards	contractual clauses between the controller or processor and the controller, processor or the recipient in another country or international organisation;	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
V.65-2(2)	Transfers Subject to Appropriate Safeguards	provisions to be inserted into an agreement between public authorities, whereby effective and enforceable protection of rights of the data subjects is provided for.	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
V.66	Transfers of Data Processed by the Competent Authorities for Special Purposes, with Application of Adequate Protection Measures	Where the processing is performed by the competent authorities for special purposes, the transfer of personal data to another country, a part of its territory or one or multiple sectors of specified activities in such country or to an international organisation for which the existence of an adequate level of protection has not been determined by means of the list referred to in Article 64, paragraph 7 of this Law shall be permitted in one of the following cases: The controller shall be obliged to notify the Commissioner of the transfer which is performed based on paragraph 1, item 2) of this Article. The controller shall be obliged to document the transfer performed based on paragraph 1, item 2) of this Article, as well as to make the documentation on such transfer available to the Commissioner, at their request. Documentation on the transfer referred to in paragraph 3 of this Article shall include information on the date and time of transfer, competent authority which receives the data, on the reasons for the transfer and on the data transferred.	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	
V.66(1)	Transfers of Data Processed by the Competent Authorities for Special Purposes, with Application of Adequate Protection Measures	where adequate safeguards for personal data are provided for in a legally binding act;	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	
V.66(2)	Transfers of Data Processed by the Competent Authorities for Special Purposes, with Application of Adequate Protection Measures	where the controller has assessed all the circumstances relating to the transfer of personal data and has determined that adequate safeguards for the personal data exist.	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	
V.67-1	Binding Corporate Rules	The Commissioner shall approve binding corporate rules, provided that such rules together fulfil the following conditions:	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
V.67-1(1)	Binding Corporate Rules	they are legally binding, they apply to and are enforced by every member concerned of the multinational company or a group of undertakings, including their employees;	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
V.67-1(2)	Binding Corporate Rules	expressly provide for exercising of the rights of data subjects with regard to the processing of their personal data;	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
V.67-1(3)	Binding Corporate Rules	fulfil the conditions laid down in paragraph 2 of this Article.	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
V.67-2	Binding Corporate Rules	The binding corporate rules referred to in paragraph 1 of this Article must determine at least: The Commissioner may regulate the method of exchange of information between the controllers, processors and the Commissioner in application of paragraph 2 of this Article in more detail. Where the conditions referred to in paragraph 1 of this Article are fulfilled, the Commissioner shall approve the binding corporate rules within 60 days from the date of submission of the application for approval thereof. Provisions of paragraphs 1 through 4 of this Article shall not apply to the transfer of data which is processed by the competent authorities for special purposes.	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
V.67-2(1)	Binding Corporate Rules	the structure and contact details of the multinational company or the group of undertakings, as well as of each of its members;	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
V.67-2(2)	Binding Corporate Rules	the transfer or sets of transfers of personal data, including the types of personal data, the types of processing activities and their purposes, the type of data subjects affected and the name of the country to which data is transferred;	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
V.67-2(3)	Binding Corporate Rules	the legally binding nature of the corporate rules, both internally within a multinational company or a group of undertakings, and externally;	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
V.67-2(4)	Binding Corporate Rules	the application of the general data protection principles, in particular processing purpose limitation, data minimisation, limited storage periods, data integrity, permanent data protection measures, legal basis for processing, processing of special types of personal data, measures to ensure data security, and the requirements in respect of onward transfers of personal data to other persons or bodies which are not bound by the binding corporate rules;	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
V.67-2(5)	Binding Corporate Rules	the rights of data subjects in regard to processing and the means to exercise those rights, including the right not to be subject to decisions based solely on automated processing, including profiling in accordance with Article 38 of this Law, the right to file a complaint with the Commissioner i.e. an action before the court in accordance with Article 82 and 84 of this Law, as well as the right to obtain compensation for a breach of the binding corporate rules;	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
V.67-2(6)	Binding Corporate Rules	the acceptance by the controller or processor with the domicile, residence or seat in the territory of the Republic of Serbia of liability for any breach of these rules committed by any other member of the group which does not have the domicile, residence or seat in the territory of the Republic of Serbia, except where the controller or processor demonstrates that such other member of the group is not liable for the event that has given rise to the damage;	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.

FDE #	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes
V.67-2(7)	Binding Corporate Rules	how the information on the binding corporate rules, in particular on the provisions of items 4) through 6) of this paragraph, is provided to the data subjects, in addition to provision of other pieces of information referred to in Articles 23 and 24 of this Law;	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
V.67-2(8)	Binding Corporate Rules	the authorisations of the data protection officer, designated in compliance with Article 58 of this Law, or of any other person authorized to supervise the implementation of the binding corporate rules within a multinational company or a group of undertakings, including supervision over training and decision-making on the complaints within a multinational company or a group;	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
V.67-2(9)	Binding Corporate Rules	the complaint procedure;	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
V.67-2(10)	Binding Corporate Rules	the mechanisms within a multinational company or a group of undertakings for the verification of compliance with the binding corporate rules. Such mechanisms shall include data protection audits and corrective actions to protect the rights of the data subject. Results of such verification must be communicated to the person referred to in item 8) of this paragraph, as well as to the governing body of the multinational company or group of undertaking, and must be made available to the Commissioner as well, at their request;	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
V.67-2(11)	Binding Corporate Rules	the method of reporting and maintaining recordings on changes to the binding corporate rules and method of notifying those changes to the Commissioner;	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
V.67-2(12)	Binding Corporate Rules	the cooperation method with the Commissioner to ensure implementation of the binding corporate rules by any member of the multinational company or a group of undertakings individually, in particular the method of making available to the Commissioner the results of verifications referred to in item 10) of this paragraph;	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
V.67-2(13)	Binding Corporate Rules	the method of reporting to the Commissioner on the legal obligations to which the member of the multinational company or the group of undertakings is subject in another country, which could have a substantial adverse effect on the guarantees provided by the binding corporate rules;	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
V.67-2(14)	Binding Corporate Rules	the appropriate data protection training to persons having permanent or regular access to personal data.	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
V.68	Transfer or Disclosure of Personal Data Based on a Decision of an Authority of Another Country	Decisions of a court or an administrative authority of another country requiring a controller or processor to transfer or disclose personal data may only be recognised or enforced in the Republic of Serbia if they are based on an international agreement, such as a mutual legal assistance treaty concluded between the Republic of Serbia and such other country, which shall be without prejudice to other grounds for transfer pursuant to the provisions of this Chapter of the Law. Paragraph 1 of this Article shall not apply to the transfer of data processed by the competent authorities for special purposes.	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	
V.69-1	Transfer of Data in Special Situations	Where the transfer of personal data is not performed in compliance with the provisions of Articles 64, 65 and 67 of this Law, such data can be transferred to another country or international organisation only in one of the following cases:	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
V.69-1(1)	Transfer of Data in Special Situations	the data subject has explicitly consented to the proposed transfer, after having been informed of the possible risks of such transfers for the data subject due to the absence of a decision on adequate protection level and appropriate safeguards;	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
V.69-1(2)	Transfer of Data in Special Situations	the transfer is necessary for the performance of a contract between the data subject and the controller or the implementation of pre-contractual measures taken at the request of the data subject;	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
V.69-1(3)	Transfer of Data in Special Situations	the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between the controller and another natural or legal person;	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
V.69-1(4)	Transfer of Data in Special Situations	the transfer is necessary for the reason of an important public interest prescribed by the law of the Republic of Serbia, providing that the transfer of individual types of personal data is not restricted by this Law;	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
V.69-1(5)	Transfer of Data in Special Situations	the transfer is necessary for the submission, exercise or defence of legal claims;	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
V.69-1(6)	Transfer of Data in Special Situations	the transfer is necessary in order to protect the vital interests of the data subject or of another natural person, where the data subject is physically or legally incapable of giving consent;	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
V.69-1(7)	Transfer of Data in Special Situations	the transfer is made of individual pieces of personal data comprised in a public register, which is available to the public or to any person which can demonstrate a legitimate interest, but only to the extent that the conditions laid down by the law for inspection in such special case are fulfilled.	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
V.69-2	Transfer of Data in Special Situations	Where the transfer may not be performed in compliance with paragraph 1 of this Article and Articles 64, 65 and 67 of this Law, personal data may be transferred to another country or to an international organisation only where the following conditions are jointly fulfilled: The controller and/or processor shall be obliged to provide proof in the records on the processing activities referred to in Article 47 of this Law on the assessment performed and on application of adequate protection measures referred to in paragraph 2, item 4) of this Article. The controller shall be obliged to notify the Commissioner of the transfer of data performed in compliance with paragraph 2 of this Article. The controller shall be obliged to provide to the data subject, in addition to information referred to in Articles 23 and 24 of this Law, information on the transfer of data referred to in paragraph 2 of this Article, including information on the specific legitimate interest of the controller that is being realized by such transfer. The transfer of data referred to in paragraph 1, item 7) of this Article may not pertain to all pieces of personal data or to complete types of personal data contained in the register. Where the data from the register intended to be available only to the persons having a legitimate interest, in compliance with paragraph 1, item 7) of this Article, the transfer may be made only at the request of those persons or if those persons are to be the recipients of data. Provisions of paragraph 1, items 1) through 3) and paragraph 2 of this Article shall not apply to the activities of public authorities in performance of their competencies. Provisions of paragraphs 1 through 8 of this Article shall not apply to the transfer of data processed by the competent authorities for special purposes.	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.

FDE #	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes
V.69-2(1)	Transfer of Data in Special Situations	the transfer of data shall not be repeated;	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
V.69-2(2)	Transfer of Data in Special Situations	data of a limited number of natural persons is being transferred;	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
V.69-2(3)	Transfer of Data in Special Situations	the transfer is necessary in order to achieve a legitimate interest of the controller which is overriding the interests and/or the rights or freedoms of the data subjects;	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
V.69-2(4)	Transfer of Data in Special Situations	the controller has ensured application of adequate protection measures for the personal data on the basis of a prior assessment of all the circumstances relating to the transfer of such data.	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	FD lists multiple sets of numbered bullet points within the same control. Both sets were separated to improve mappability.
V.70	Special Situations Regarding the Transfer of Data Processed by the Competent Authorities for Special Purposes	Where the transfer of personal data processed by the competent authorities for special purposes is not carried out in compliance with the provisions of Articles 64 and 66 of this Law, such data can be transferred to another country or to an international organisation only where such transfer is necessary in one of the following cases: The transfer of personal data cannot be performed where the competent authority which is performing the transfer determines that the public interest referred to in paragraph 1, items 4) and 5) of this Article is overridden by the interest of the protection of fundamental rights and freedoms of the data subjects. The competent authority shall be obliged to document the transfer performed on the basis of paragraph 1 of this Article, as well as to make such documentation available to the Commissioner, at their request. The documentation on transfer referred to in paragraph 3 of this Article shall include information on the date and time of the transfer, on the competent authority which is receiving the data, on the reasons for transfer and on the data transmitted.	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	
V.70(1)	Special Situations Regarding the Transfer of Data Processed by the Competent Authorities for Special Purposes	in order to protect the vitally important interests of the data subject or of another natural person;	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	
V.70(2)	Special Situations Regarding the Transfer of Data Processed by the Competent Authorities for Special Purposes	in order to protect the legitimate interests of the data subjects, if that is provided for by the law;	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	
V.70(3)	Special Situations Regarding the Transfer of Data Processed by the Competent Authorities for Special Purposes	in order to prevent an imminent and serious threat to the public safety of the Republic of Serbia or another state;	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	
V.70(4)	Special Situations Regarding the Transfer of Data Processed by the Competent Authorities for Special Purposes	in an individual case, where it is a case of processing for special purposes;	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	
V.70(5)	Special Situations Regarding the Transfer of Data Processed by the Competent Authorities for Special Purposes	in an individual case, with the aim of submitting, exercising or defending of a legal claim, where such aim is directly related to the special purposes.	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	
V.71	Transfer of Data Processed by the Competent Authorities for Special Purposes to a Recipient in another Country	By way of exception from the provision of Article 63, paragraph 2, item 2) of this Law and irrespective of the application of the international agreement referred to in paragraph 2 of this Article, the competent authority processing the data for special purposes may directly transfer the personal data to a recipient in another country only where other provisions of this Law are complied with and where the following conditions are aggregately met: The international agreement referred to in paragraph 1 of this Article shall be each agreement which is concluded between the Republic of Serbia and one or a more other countries, which is regulating cooperation in criminal matters or police cooperation. The competent authority which is carrying out the transfer shall be obliged to notify the Commissioner of the transfer which has been carried out on the basis of paragraph 1 of this Article. The competent authority shall be obliged to document the transfer which has been carried out on the basis of paragraph 1 of this Article, as well as to make such documentation available to the Commissioner, at their request. The documentation on transfer referred to in paragraph 4 of this Article shall include information on the date and time of the transfer, on the recipient of data, on the reasons for transfer and on the data transmitted.	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	
V.71(1)	Transfer of Data Processed by the Competent Authorities for Special Purposes to a Recipient in another Country	the transfer is necessary for exercising of a legal authorisation of the competent authority which is carrying out the transfer for special purposes;	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	
V.71(2)	Transfer of Data Processed by the Competent Authorities for Special Purposes to a Recipient in another Country	the competent authority which is carrying out the transfer has established that the interest of the protection of fundamental rights or freedoms of the data subjects is not overriding the public interest for the protection of which data transfer needs to be carried out;	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	
V.71(3)	Transfer of Data Processed by the Competent Authorities for Special Purposes to a Recipient in another Country	the competent authority which is carrying out the transfer considers that the transfer to the competent authority in another country for special purposes is inefficient or that it does not correspond to the achievement of such purposes, and in particular where the transfer cannot be carried out in due time;	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	
V.71(4)	Transfer of Data Processed by the Competent Authorities for Special Purposes to a Recipient in another Country	the competent authority in another country is without undue delay notified of the transfer, unless where such notification is inefficient or does not correspond to the achievement of the purpose;	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	

FDE #	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes
V.71(5)	Transfer of Data Processed by the Competent Authorities for Special Purposes to a Recipient in another Country	the competent authority which is carrying out the transfer has notified the recipient in another country of the purposes of data processing, as well as that the processing can only be carried out for such purposes, by the recipient only and only where such processing is necessary.	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	
V.72	International Cooperation with regard to the Protection of Personal Data	The Commissioner shall take appropriate measures in relations with the authorities competent for the protection of personal data in other countries and international organisations with a view to:	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	
V.72(1)	International Cooperation with regard to the Protection of Personal Data	developing international cooperation mechanisms to facilitate the effective enforcement of laws pertaining to the protection of personal data;	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	
V.72(2)	International Cooperation with regard to the Protection of Personal Data	providing international mutual assistance in the enforcement of laws pertaining to the protection of personal data, including through notification, referral to protection procedures and legal assistance in supervision, as well as to exchange of information, subject to appropriate safeguards for the protection of personal data and fundamental rights and freedoms;	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	
V.72(3)	International Cooperation with regard to the Protection of Personal Data	engaging stakeholders in discussions and activities aimed at development of international cooperation in the enforcement of laws pertaining to the protection of personal data;	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	
V.72(4)	International Cooperation with regard to the Protection of Personal Data	fostering and promoting the exchange of information on personal data protection legislation and its application, including on the issues of jurisdictional conflicts with other countries in this field.	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	
VI	THE COMMISSIONER	See FDE for details.	Functional	No Relationship	N/A	N/A	N/A	0	
VII	REMEDIES, LIABILITY AND PENALTIES	See FDE for details.	Functional	No Relationship	N/A	N/A	N/A	0	
VIII	SPECIAL CASES OF PROCESSING	N/A	Functional	No Relationship	N/A	N/A	N/A	0	
VIII.88	Processing and Freedom of Expression and Information	Provisions of Chapters II through VI and Articles 89 through 94 of this Law shall not apply to processing carried out for purposes of journalistic reporting and publication of information in media, as well as for the purposes of scientific, artistic or literary expression, where in the concrete case such restrictions are necessary to protect the freedom of expression and information.	Functional	No Relationship	N/A	N/A	N/A	0	
VIII.89	Processing and Free Access to Information of Public Importance	Information of public importance which include personal data can be made available to a person seeking information by the public authorities in such a manner as to ensure that the right of the public to be informed and the right to protection of personal data can be exercised together, to the extent prescribed by the law regulating free access to information of public importance and by this Law.	Functional	No Relationship	N/A	N/A	N/A	0	
VIII.90	Processing of the Unique Personal Identification Number	Provisions of the law regulating Unique Personal Identification Number and/or other law shall apply to processing of the Unique Personal Identification Numbers, in addition to application of the provisions of this Law concerning protection of the rights and freedoms of data subjects.	Functional	No Relationship	N/A	N/A	N/A	0	
VIII.91	Processing in the Field of Labour and Employment	Provisions of the law regulating labour and employment and collective agreements shall apply to processing in the field of labour and employment, in addition to application of the provisions of this Law. Where the law regulating labour and employment or a collective agreement include provisions on the protection of personal data, specific measures must additionally be prescribed to safeguard the data subject's human dignity, legitimate interests and fundamental rights, with particular regard to the transparency of processing, the exchange of personal data within a multinational company and/or group of undertakings, as well as monitoring systems at the work place.	Functional	No Relationship	N/A	N/A	N/A	0	
VIII.92	Safeguards and Restriction of Application of the Law Relating to Processing for Archiving Purposes in the Public Interest, Scientific or Historical Research Purposes or Statistical Purposes	Processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, shall be subject to appropriate safeguards for the rights and freedoms of the data subject prescribed by this Law. Those safeguards shall ensure that technical, organisational and staff-related measures are implemented, in particular in order to ensure respect for the principle of data minimisation. Those measures may include pseudonymisation provided that those purposes can be fulfilled in that manner. Where the purposes referred to in paragraph 1 of this Article can be achieved without identification or without further identification of data subjects, such purposes must be achieved in a manner that will prevent further identification of such person. Provisions on the rights of data subjects referred to in Articles 26, 29, 31 and 37 of this Law shall not apply where processing is carried out for the purposes of scientific or historical research or statistical purposes, providing that it is necessary for achievement of such purposes or where application of such provisions of the law would render impossible or significantly impair the achievement of such purposes, with implementation of the measures referred to in paragraphs 1 and 2 of this Article. Provisions on the rights of data subjects referred to in Articles 26 and 29 and Articles 31 through 37 of this Law shall not apply where processing is carried out for archiving purposes in the public interest, where that is necessary for achievement of such purpose or where application of such provisions would render impossible or significantly impair the achievement thereof, with implementation of the measures referred to in paragraphs 1 and 2 of this Article. Where the processing referred to in paragraphs 3 and 4 of this Article is performed for other purposes as well, provisions of this Law shall apply to the processing for other purposes without limitations.	Functional	No Relationship	N/A	N/A	N/A	0	
VIII.93	Processing by the Church and Religious Communities	Where churches or religious communities apply comprehensive rules relating to the protection of natural persons with regard to processing, such existing rules may continue to apply, provided that they are brought into line with this Law. In the case referred to in paragraph 1 of this Article, provisions of this Law on the inspection and other powers of the Commissioner referred to in Articles 77 through 79 of this Law, unless where a church and/or a religious community establishes a separate independent supervisory body which shall safeguard such powers, providing that such a body complies with the conditions provided for in Chapter VI of this Law.	Functional	No Relationship	N/A	N/A	N/A	0	
VIII.94	Processing for Humanitarian Purposes by the Public Authorities	Personal data processed by a public authority can additionally be processed in order to collect means for humanitarian purposes, with implementation of appropriate measures to safeguard the rights and freedoms of data subjects, in compliance with this Law. With the aim of collecting means for humanitarian purposes, personal data processed by a public authority may not be given to other persons.	Functional	No Relationship	N/A	N/A	N/A	0	
IX	PENAL PROVISIONS	See FDE for details.	Functional	No Relationship	N/A	N/A	N/A	0	
X	TRANSITIONAL AND FINAL PROVISIONS	See FDE for details.	Functional	No Relationship	N/A	N/A	N/A	0	