



# DATA PROTECTION COMPLIANCE IN MONACO: NEW ONLINE PREREGISTRATION AND NEW MODALITIES FOR THE DECLARATION FORMS

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The Monegasque Data Protection Authority (CCIN) announced on the European Data Protection Day (28 January 2017) the possibility for data controllers to complete online their declaration forms.

The new Internet Site of the CCIN offers data controllers the choice to preregister their dossier.

The entered form is sent via email. It has then to be print and signed by the authorised person, before to be addressed by postal service (registered letter with return receipt), or by hand, to the CCIN offices. The paper version of the form shall be returned within six months, after which the preregistration is cancelled.

Although the filing of the paper version of the declaration form remains mandatory, the online preregistration presents several advantages.

The content of the information to be provided has not changed. However, the online forms are simpler to use as the traditional forms:

- The required fields are clearly marked;
- The qualification of the data processing (ordinary declaration, advisory request, authorisation request) is easier;
- To avoid any confusion, the terminology is readily and accurately defined;
- All legal and informative relevant documents are rapidly accessible;
- Examples to explain the requested information are regularly given.

Moreover, the Part “Security of the processing” of the online forms depends on the type of the processing, while the paper version contains a unique technical part that is applicable to all processing, without any distinction. An additional “Security Questionnaire” points in particular to:

- the risk assessment;
- the user authentication, the securing of terminal equipment;



- the server and storage access;
- the protection of the computer network;
- the management of access privileges;
- the securing of servers and applications;
- the relationship management with sub-contractors;
- the protection of portable computing and storage; etc.

Lastly, new modalities apply to requests for data transfer to third countries that are not ensuring an adequate level of protection. The forms are based on the purpose of processing (no longer on the data recipient), to avoid the increased number of requests. These also contain a new specific part on security measures.

These developments are welcome.

## DISCOVER MORE ABOUT THE CLOUD PRIVACY CHECK(CPC) / DATA PRIVACY COMPLIANCE(DPC) PROJECT

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