

Pursuant to Article 71(2) of the Official Statistics Act (Official Gazette, No 25/20), the Director General of the Croatian Bureau of Statistics adopts

INSTRUCTION ON THE METHOD OF PROTECTION OF CONFIDENTIAL STATISTICAL DATA IN THE CROATIAN BUREAU OF STATISTICS

I GENERAL PROVISIONS

Article 1

This Instruction regulates the procedures and methods of implementing physical, technical and organisational measures to ensure the physical, technical and logistical protection of confidential statistical data against unauthorised access, alteration, loss, removal or destruction, and other issues relevant to the security and protection of confidential statistical data collected for the production of official statistics within the scope of the Croatian Bureau of Statistics (hereinafter: the Bureau).

Article 2

Measures for the protection of confidential statistical data in the sense of this Instruction shall include rules and procedures to ensure the protection of identification information on statistical units in the process of collection, processing and delivery, which in particular include:

- protection of premises where statistical data are located/stored, including entry and exit control
- protection of access to information technology equipment (hereinafter: IT equipment) and network servers, devices and media that are used to store confidential statistical data in electronic form
- safeguarding access to confidential statistical data through security permits and authorisations
- recording of events relating to access to, use and disclosure of confidential statistical data
- keeping records of the licences and authorisations of employed persons who have access to confidential statistical data in the performance of their duties
- the obligation to sign a statement of statistical confidentiality; and
- other issues relating to the security and protection of confidential statistical data.

Article 3

(1) The measures for the protection of confidential statistical data set out in this Instruction shall be applied by all employed persons of the Bureau.

(2) The provisions of this Instruction shall also apply to other natural persons or legal entities entrusted by contract or authorisation with the performance of certain tasks or duties relating to the activities of official statistics.

Article 4

The terms used in this Instruction, which have gender meaning, refer equally to male and female gender.

II DATA COLLECTION

Article 5

(1) The Bureau has the right, in order to perform the tasks of official statistics, to collect and combine data from all available sources.

(2) The Bureau processes data on statistical units in accordance with the Official Statistics Act (hereinafter: Act), based on the Programme of Statistical Activities of the Republic of Croatia, the Annual Implementation Plan, a special law or a decision of the Government of the Republic of Croatia (hereinafter: statistical data) collected through:

- statistical forms in printed format
- statistical forms in electronic format
- transmission/access to administrative data sources as well as observation and monitoring method.

(3) The statistical unit is the basic unit of observation, i.e. a natural person, a household, an economic entity and other enterprises to which the data relate.

(4) Confidential statistical data shall be understood as information enabling the direct or indirect identification of statistical units, whereby individual information is disclosed.

Article 6

The organisational unit of the Bureau within whose scope statistical data have been collected shall ensure that the process of separating statistical unit identifiers from the content variables is carried out in accordance with the Act.

III ORGANISATION OF PHYSICAL AND TECHNICAL PROTECTION OF PREMISES AND EQUIPMENT USED FOR THE STORAGE OF CONFIDENTIAL STATISTICAL DATA

Article 7

Official premises and IT equipment of the Bureau shall be secured and protected in accordance with the regulations governing the protection of persons and property, measures and standards of information security in the field of physical and technical security as well as with internal acts of the Bureau referring to that area.

Protection of statistical data collected through statistical forms in printed format

Article 8

(1) Confidential statistical data collected through statistical forms in printed format shall be stored and kept in the Bureau's premises, locked cabinets or on protected shelves until the completion of the entry, arrangement and coding phase.

(2) Access to the premises referred to in paragraph 1 of this Article shall be granted only to employed persons of the Bureau who perform data processing tasks and to other natural persons or legal entities entrusted, on the basis of a contract, with the performance of certain tasks relating to official statistics activities.

(3) The premises referred to in paragraph 1 of this Article shall be locked.

(4) Statistical forms in printed format containing data collected in statistical surveys shall be destroyed upon completion of the processing process in a manner and procedure that ensures their protection against unauthorised disclosure or misappropriation.

Protection of statistical data collected through statistical forms in electronic format

Article 9

(1) Confidential statistical data collected through statistical forms in electronic format shall be stored and kept on servers, devices and media used for storage of data in electronic format.

(2) Premises for the placement of servers, devices and media used for storage of statistical data in electronic format (hereinafter: protected premises) shall be determined by the Director General by special decision, at the proposal of the head of the directorate competent for IT-related affairs.

(3) Entry into the protected premises referred to in paragraph 2 of this Article shall be permitted only to persons who perform the tasks of their workplace in those premises and to persons holding a special entry permit.

(4) A special entry permit shall be granted by the head of the directorate competent for IT-related affairs.

Article 10

(1) A sign indicating forbidden entry to unauthorised persons shall be affixed to the doors of the protected premises, clearly visible from the direction of entry into the premise.

(2) The entry into the protected premises must be controlled by applying appropriate technical means.

Article 11

Protected premises must have:

- devices for automatic detection, alarming and dry fire extinguishing (gas)
- the humidity and temperature ensured in accordance with the equipment manufacturer's instructions and the rules of the profession; and
- warning on forbidding to take in corrosive and easily volatile liquids, explosives and similar hazardous or noxious substances.

Article 12

(1) Statistical data collected and processed by the Bureau in accordance with the Annual Implementation Plan, which are not stored in accordance with Articles 8 and 9 of this Instruction, shall be stored and kept on personal computers located in the Bureau's organisational units responsible for their collection and processing.

(2) Access to the personal computers referred to in paragraph 1 of this Article shall be granted only to employed persons of the Bureau to whom personal computers have been entrusted in order to perform the tasks of their workplace.

(3) The computers referred to in paragraph 1 of this Article shall be set up in such a way as to request user registration prior to the start of operations.

(4) The provisions of paragraphs 1, 2 and 3 of this Article shall apply in an appropriate way to laptop computers.

Protection of statistical data collected from administrative data sources and by using the method of observation and monitoring

Article 13

The provisions of this Instruction shall also apply to statistical data collected from the holders of administrative data sources and by using the method of observation and monitoring from the moment the data have been submitted to the Bureau.

IV ACCESS TO CONFIDENTIAL STATISTICAL DATA

Article 14

(1) Access to confidential statistical data of the Bureau located on servers, devices and media used for the storage of data in electronic format shall be allowed upon granting the permit to:

- employed persons of organisational units of the Bureau who use those data for the purposes of processing, producing and disseminating official statistics within their scope of work
- employed persons of the organisational unit of the Bureau responsible for computers and network servers and other employed persons of the Bureau who take care of the maintenance of equipment and information systems.

(2) The permits for employed persons of the Bureau referred to in paragraph 1, indent 1 of this Article shall be granted by the head of the organisational unit within scope of whom the confidential information is held, subject to the prior consent of the superior head of the directorate.

(3) Permits for employed persons of the Bureau referred to in paragraph 1, indent 2 of this Article shall be granted by the head of the directorate responsible for information technology.

Article 15

(1) Access to confidential statistical data contained on a personal computer in an organisational unit or on a laptop computer shall be allowed only to an employed person of an organisational unit who uses a personal or laptop computer for the purpose of performing statistical activities within the scope of his/her workplace.

(2) Remote access from the laptop computer to confidential statistical data contained on the employed person's personal computer or on servers, devices and media for the storage of data in electronic format connected to the employed person's laptop computer shall be allowed only to the employed person to whom the laptop computer has been entrusted for the performance of his/her duties.

Article 16

(1) Employed persons of the Bureau who have been granted access to confidential statistical data contained on servers, devices and media for the storage of data in electronic format, as well as personal and laptop computers, shall log into the system prior to use and log out after the end of use, using the appropriate username and associated passwords.

(2) Employed persons referred to in paragraph 1 of this Article shall keep user data for connection to the system in a way that prevents other persons from accessing them.

Article 17

Any access to confidential statistical data contained on servers, devices and media for the storage of data in electronic format and to personal or laptop computers shall be automatically recorded by the username, date and time of log-in and log-out, and, in the event of attempt of unauthorised access to such data, by location where such access has been attempted, where possible.

Article 18

The employed person of the Bureau shall without delay inform the immediate superior officer and the person responsible for the implementation of safeguarding measures of the Bureau's IT system of any attempt to unauthorised access, disclosure, alteration and destruction of confidential statistical data.

Article 19

(1) The employed person who has been entrusted with a laptop computer to perform his/her duties will be allowed to access the Bureau's IT system using remote access – a virtual private network of the Bureau using the Bureau's VPN software.

(2) Access to the IT system referred to in paragraph 1 of this Article shall be automatically recorded by the username, date and time of log-in and log-out.

(3) Access of employed person to the Bureau's IT system from a private computer or a computer not owned by the Bureau is not allowed.

Article 20

(1) Access to confidential statistical data shall be permitted only in accordance with the legal, regulatory and administrative provisions governing the field of official statistics.

(2) In order to prevent the deliberate disclosure of confidential statistical data referred to in paragraph 1 of this Article, all systems processing confidential statistical data shall be set up in such a way as to meet the following requirements:

- that the storage of data on media for the storage of data in electronic format can only be carried out at specific locations in the system;
- that the printing of confidential data (document, table, etc.) can only be carried out at specific locations in the system;
- that verification of the adequacy of measures and methods to protect confidential statistical data from disclosure (logical control) is undertaken before the results of official statistics are made available to users.

V SECURITY STORAGE OF CONFIDENTIAL STATISTICAL DATA

Article 21

(1) The security storage of confidential statistical data in electronic format shall be mandatory and shall contain a procedure for storing a backup data in the event of loss, damage or destruction of such data in such a way as to enable their recovery.

(2) Security storage shall be carried out in accordance with the valid acts of the Bureau in the field of information security relating to the management of information and communication systems.

Article 22

(1) The Director General of the Bureau is obliged to appoint a person who is responsible for the implementation of measures to secure the IT system, security data storage and for preventing unauthorised access to the system data.

(2) The person referred to in paragraph 1 of this Article shall have the right to grant, modify and revoke the authorisation to work in the system to other employed persons of the Bureau, and may assign part of his or her authorities relating to a particular area to other employed persons as well.

VI OBLIGATIONS AND RESPONSIBILITIES OF THE BUREAU'S EMPLOYED PERSONS

Article 23

(1) An employed person of the Bureau who uses IT equipment to access confidential statistical data in the performance of his or her duties shall:

- keep his or her password for access to a personal computer and/or other electronic device containing confidential statistical data confidential
- change his or her password at least once in 60 days
- change the password immediately if there is a suspicion that his or her password is known to other persons
- check-out from the computer or lock the computer if he or she will not work either for longer or for a shorter period of time.

(2) It is forbidden to use other people's usernames and passwords to access confidential statistical data.

Article 24

(1) An employed person of the Bureau who performs tasks related to the activities of official statistics at his workplace shall be required to get to know the provisions of regulations and other internal acts relating to confidentiality and protection of statistical data and information security before starting his or her work.

(2) Before starting work, the employed person referred to in paragraph 1 of this Article shall sign a confidentiality statement on the Form – a declaration of statistical confidentiality, which is an integral part of the internal personal data protection act.

(3) The regulations and other internal acts referred to in paragraph 1 of this Article shall be published on the Bureau's intranet page, in one place, in a clear and easily visible manner.

Article 25

The immediate officer shall immediately inform in writing the organisational unit of the Bureau responsible for IT systems in the case when an employed person who holds a permit for access to confidential statistical data ceases his or her employment, is transferred to another organisational unit of the Bureau or is temporarily removed from the service, so that his or her authorisation in the Bureau's IT system can be terminated or changed in accordance with the needs of the new post or new situation.

Article 26

(1) The Bureau shall keep records of:

- issued licences and authorisations for access to premises and devices on which confidential statistical data is stored
- permits/authorisations to access confidential statistical data issued to employed persons in order to carry out their duties.

(2) The records of the access referred to in paragraph 1 of this Article shall be revised at least once a year (at the beginning of the calendar year).

Article 27

The records referred to in Article 26 of this Instruction shall be kept by the organisational unit of the Bureau responsible for information technology and the implementation of information security related tasks.

Article 28

(1) An employee of the Bureau is responsible for all activities performed on a personal computer at his workplace, in the local computer networks of the Bureau using his user name and password.

(2) The employed person is responsible for all activities performed on the assigned laptop computer by using his or her username and password, as well as the by using the user name and password for remote access to the Bureau's computer network.

VII TRANSITIONAL AND FINAL PROVISIONS

Article 29

The Director General shall take the decision referred to in Article 9 of this Instruction within 30 days of the date of entry into force of this Instruction.

Article 30

In order to meet the security criteria for all the information and communication systems of the Bureau used for the transmission, access, processing and storage of confidential statistical data, documentation related to information security and evaluation of the success of the implementation of security measures laid down in these documents shall be prepared.

Article 31

(1) Supervision of the implementation of the provisions of this Instruction shall be carried out by the Director General, Deputy Director General, Heads of Sector and other senior officials of the Bureau.

(2) Supervision of the implementation of the provisions of this Instruction shall also be carried out by the Head of the Information Security System Management Board.

Article 32

This Instruction shall enter into force on the eighth day following that of its publication in the Official Gazette.

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