1. Basic Information

1.1. CRIS-number 2002/000.601.03.02

1.2. Title Strengthening Administrative and Technical Capacity of Personal Data protection, IT and Electronic Data Security

1.3. Sector Internal Market

1.4. Location State Data Protection Inspectorate (SDPI), Lithuania; Ministry of the Interior (MoI), Lithuania.

2. Objectives

2.1. Overall Objective

The overall objective of this € 1.835 Million institution building and investment project, of which € 0.135 Million is provided from national co-financing is to ensure that Personal Data protection, IT and Electronic Data security correspond to EU requirements and operate effectively.

2.2. Project Purpose

Sub-component 1: Personal Data Protection
- Strengthen the administrative capacity of the State Data Protection Inspectorate to enforce legislation in data protection, in particular by the provision of training;
- Increase the awareness of the Lithuanian administration, data controllers and the public concerning data protection.

Sub-component 2: IT and Electronic Data Security
- Increase administrative capacity of Information Policy Department of the MoI.
- Align Lithuanian IT and data protection system with the Acquis and international requirements, including Convention on the Protection of Individuals with regard to automatic processing of personal data.
- Increase administrative and operational capacities of state institutions working with IT and data security.
- Ensure proper IT and data security level.

2.3. Accession Partnership and NPAA Priorities

Accession Partnership 2001 states: Complete the process of alignment in the field of data protection; complete reorganisation of the State Data Protection Inspectorate, ensure its full independence; strengthen the administrative capacity, in particular through the provision of training.

NPAA 2001 in its measure 3.2.1-P-A2 foresees the creation of a unified state information system, in measure 3.3.4-T1 adoption and enforcement of the Law on the Amendment Law on Legal Protection of Personal Data and in measure 3.3.4-S1 strengthening of the State Data Protection Inspectorate in order to ensure the effective control of the personal data processing.
3. Description

3.1. Background and Justification

Sub-component 1: Personal Data Protection

The message conveyed by the 2001 Accession Partnership is clear: data protection legislation is still not fully in line with the acquis and the Data Protection Inspectorate needs to be strengthened and its independence ensured. There have been advancements in this field, but some issues remain to be tackled, particularly strengthening the capacity of the staff of the State Data Protection Inspectorate and increasing the awareness and broaden information of the society in the field of data protection.

The new version of the Law on Legal Protection of Personal Data was adopted in July 2000 (came into force in January 2001). This Law in its essence is aligned with the Directive 95/46/EC on the Protection of Individuals with regard to the Processing of Personal Data and on the free movement of such data. In September 2001 the Government of the Republic of Lithuania implementing this Law by its Resolution restructured the State Data Protection Inspectorate into an independent governmental institution and determined that the maximum staff is 22.

Before the implementation of the activities provided in the subcomponent 1 of the project, the Law on the Amendment Law on Legal Protection of Personal Data should be adopted. This Law will amend some provisions of the existing Law on Legal Protection of Personal Data. The date of adoption by the Seimas of the Republic of Lithuania foreseen in the NPAA is the IV quarter of 2002 (foreseen come into force on 1 January 2003). The main objective of the new amendments is to achieve full harmonisation with EU legislation including putting in place the necessary elements for ensuring full independence of the Supervisory authority of data protection. While preparing these amendments, the comments of the experts of the European Commission and the Council of Europe, especially those on the independence of the supervisory authority, will be taken into account.

The Programme of Data Protection Development for the years 2002-2004 was prepared and approved by the Director of the State Data Protection Inspectorate. The activities planned under this project are in conformity with the activities planned in the Programme.

The Institute of the Public Administration has since the year 2000 delivered training courses on data protection for data controllers from State institutions. During these courses, other seminars and meetings with data controllers from private sector the SDPI discussed with data controllers and their proposals were taken into consideration when preparing this project. The SDPI will benefit from twinning with a similar institution from the EU Member States, as their know-how will be transferred during secondments, seminars and thus increase the capacity of the Inspectorate.

Sub-component 2: IT and Electronic Data Security

While integrating into the EU and implementing the requirements of the eEurope+ Action Plan, Schengen Agreement and Europol Convention it is necessary to align Lithuanian IT and data protection system with the Acquis and international requirements.

Lithuania has already taken steps to ensure implementation of the Schengen Agreement (Phare project LI9908.01) and establishment of the Europol Bureau (Phare proj-
ect LI2001/IB/JH/01), however it needs to go further and to ensure alignment of its IT and data protection system. Improvements in the field of IT and Electronic Data Protection are priorities of the Lithuanian Government. A strategy and action plan have been prepared, which include the most important elements for further development and implementation of measures related to IT security.

This IT system should encompass all state institutions in order to perform their functions while exercising proper control of the information in order to ensure protection against hazards such as unwanted or unwarranted dissemination, alteration, or loss of information.

Additionally, in the year 2000 the Government of Lithuania has requested a preliminary Gap Analysis to be conducted in the field of IT security and Electronic Data protection and the results showed that Lithuanian IT security level was insufficient.

The results of the security assessment showed that:

- Information security in general is poor in most Government departments. Substantial improvements are required for the safe provision of E-Government services.
- There are significant weaknesses in information security controls. Improvements are required in almost all areas of security in order to protect the information infrastructure from attacks that could affect the operation of many Government agencies.
- The main reasons for poor security are a general lack of awareness for the importance of security, shortage of finance to fund security needs and inexperienced security personnel.

In the recommendations concerning security, it is stated that there is a need for:

- Establishment of security advisory and accreditation entity responsible for developing Government security standards, advising and coaching ministries on all aspects of their information security and ensuring compliance to security standards.
- Adoption of internationally recognised security management standard such as BS7799 or ISO13335 to ensure that security is managed appropriately across Government agencies.

During the preparation of the project data controllers from state institutions and private sector, the Association of Enterprises of Information Technologies, Telecommunications and Office Equipment were consulted and the majority of their comments were taken into account.

3.2. **Linked Activities**

Sub-component 1: Personal Data Protection

In the years 1999-2000 the State Data Protection Inspectorate received help from PHARE SEIL: analysis of the Draft Law, training course on data protection at the Institute of Public Administration and translation of documents. In 2001 the SDPI received technical assistance from the Council of Europe with the expertise on accordance of the Law on Legal Protection of Personal Data with Convention for the Protection of Individuals with Regard to Automatic Processing of Personal Data ETS No 108 and held detailed discussions with the European Commission on its alignment with the Community acquis.
Sub-component 2: IT and Electronic Data Security

IT and Electronic Data security were mainly strengthened from national funds. However the MoI is implementing the Schengen project (LI9908.01) and the Europol project (LI2001/IB/JH/01), which to some extent are related to the issue.

3.3. Results

Sub-component 1: Personal Data Protection

The guaranteed results expected from this project are:

- Efficient and professional work of the Data Protection Supervisory Authority reflecting current good practice in Member States ensured;
- Effective supervision of the activities relating to the processing of personal data ensured, qualification of the Data Protection Supervisory Authority inspectors raised, their professional skills and knowledge improved;
- Awareness on data protection requirements and procedures increased among judges, government agencies, businesses and the general public.

Sub-component 2: IT and Electronic Data Security

Twinning

- Methodology manuals on IT and Electronic Data security to be used by all governmental institutions prepared.
- Requirement manuals on IT and Electronic Data security to be used by all governmental institution prepared.
- Informational web portal including distant learning system created.
- Training programmes prepared and staff trained. The training will include a limited number of study visits to the Member State’s administration. The training will be provided to approximately 200 persons from state institutions involved in the project, including train-the-trainer component. Additionally 15 experts working in IT security evaluation and consulting institutions will be trained.

Investment

- Hardware and software necessary for the protection of IT and electronic data security system installed and operational.

3.4. Activities

The project will be executed with the help of 2 Twinning arrangements and 1 Supply contract.

Sub-component 1: Personal Data Protection

Scope of twinning

- Analysis of training needs, provide necessary training (including one month term secondments of 2-4 inspectors in the Data Protection Supervisory Authorities of EU Member States): 1) on carrying out the control of the personal data processing
based on the best practice of the EU Member States; 2) on carrying out the prior checking;
• Preparation of training packages for data protection officials on personal data processing, disposal to the Lithuanian Institute of Public Administration and other educational institutions;
• Preparation and conduction of different seminars to the data controllers, data protection supervisory authorities and judges;
• Creation of a public information strategy and information material on personal data protection;
• Preparation of the comments on the Law on Legal Protection of Personal Data of the Republic of Lithuania based on Directive 95/46/EC and Convention ETS No 108 to ensure clarification and effective application of the Law in practice;
• Analysis of the functions of the SDPI, Inspector on the Journalist Ethics and the Administrative Disputes Commissions in the area of supervision of information and investigation of complaints, preparation of proposals, based on this analysis, how the supervision of information and investigation of complaints should be administrated: by the different institutions or by creation of collective administration system;
• Creation of the outline of a data security conformity evaluation system.

Required Inputs
One PAA over period of 18 person/months having the overall responsibility for the project should be an expert in data protection legislation and have minimum 3 years recent experience from a similar institution in the EU Member State. Additionally the PAA shall possess the following qualifications:
• Experience in project management and good inter-personal skills;
• Good knowledge of written and spoken English;
• Practical experience in the preparation and implementation of training packages (seminars) would be an advantage.

Short term experts
Short-term expert’s for 12 person/months. They must be familiar with EU data protection legislation, have experience in preparing and delivering of training programmes (seminars) and have good knowledge of spoken and written English.

Operating environment of the Twinning
The State Data Protection Inspectorate will be the counterpart for the twinning project. To ensure smooth operations, the SDPI will provide office accommodation and the usual office equipment to the project.

Sub-component 2: IT and Electronic Data Security

Twinning and Training package
Guaranteed results/expected outputs:
• Evaluation of the existing situation in the field of IT and Electronic Data security. (to be conducted before accession to EU)
• Revision of existing legal documents (including Government Resolution on Data Protection in State and Municipal Information Systems and IT Security Strategy) so that they are in line with EU requirements and international standards which regulate the sphere of IT and Electronic Data security.
• Preparation of methodology manual for IT and Electronic Data security evaluation in line with ISO-13335, ISO-17799, ISO 15408. (to be conducted before accession to EU)
• Preparation of requirements manual for IT and Electronic Data security evaluation in line with ISO-13335, ISO-17799, ISO 15408. (to be conducted before accession to EU)

• Preparation of training programmes and training of state institutions staff responsible for IT security. The programmes will include train-the trainer component. Additionally, the designed web site will be used for distant learning during and after the project.

  Scope of the twinning

• Preparation of IT and data security Gap Analysis.

• Revision of Government Resolution on Data Protection in State and Municipal Information Systems and preparation of proposals for its amendment.

• Assistance in revision of IT security strategy in order to keep it in line with EU requirements (the strategy itself foresees its constant revision, so that it would always be up to date).

• Preparation of IT security requirements for electronic business, electronic correspondence, computer nets, web servers, person identification and electronic signature;

• Preparation of requirements manual for IT and data security evaluation according to data security levels;

• Development of methodology manual for IT and data security evaluation according to data security levels;

• Design of a web site for distant learning on IT security and information on different IT security aspects.

• Preparation of training programmes and training of staff including train-the trainer component. The training, among other areas, will include topics concerning user practice for newly prepared manuals and training on different aspects of IT security.

  Required inputs

One PAA over the period of 18 person/months with good administrative and management skills and good knowledge of written and spoken English. S/he will be providing general management and institutional support to ensure an effective implementation of the project. Additionally, the PAA will possess the following qualifications:

• At least 5 years of working experience in the field of IT security management.

• Experience in solving co-ordination and co-operation issues.

• Practical experience in the field of preparation and implementation of IT security requirements.

• Practical experience in the preparation and implementation of training packages would be an advantage.

• Good knowledge of international requirements in the field of IT security would be an advantage.

  Short and medium term experts

A group of short-term experts (STEs) for 20 person/months. All must be familiar with EU operations in the field of IT and electronic data protection have experience in preparing and delivering of training programmes, and have good knowledge of spoken and written English. Additionally, some of the experts must have sufficient knowledge in such fields as security of financial transactions, personal identification and
digital signature (PKI-Public Key Infrastructure), web technologies and telecommunications technologies.

Operating environment of the Twinning

The Information Policy Department of the MoI will be the counterpart for the twinning project. To ensure smooth operations, the MoI will provide office accommodation and the usual office equipment to the project. It will also contribute to covering the expenses of seminars in Lithuania and of local travel.

Supply component

Equipment (hardware and software), which is necessary for the protection of IT and electronic data security system, funded by Phare and co-financed by the Ministry of the Interior will be acquired. This will include installation of equipment and training of personnel, who will be working with this equipment.

The system will be administered by the specialists of Information Policy Department of MoI and it will be located in the premises of the department.

The initial technical preparations have been completed, and a preliminary equipment list is provided in Annex 4. The final technical specifications and final list of equipment will be prepared with the advice from the PAA and STEs.

3.5 Lessons learned

There has been no previous Phare assistance directly to the field of personal and electronic data protection. However, while preparing this project recommendations made to other Phare projects in different fields have been taken into account. As indicated in Annex 2 of this fiche the preparation of Technical Specifications for the Supply component will start independently even before the Twinning and training package commences. This will help to avoid the situation when the preparation of Technical specifications and announcement of Tender are delayed due to the fact that the Twinning partner has been found later than expected.

4. Institutional Framework

Sub-component 1: Personal Data Protection

The project will be implemented by the State Data Protection Inspectorate. The SDPI was established in October 1996. Until 1998 the Inspectorate supervised data processing in the public sector. In 1998 provisions of the Law on Legal Protection of Personal Data of 1996 were partially changed, which allowed the SDPI to supervise personal data processing in private sector. In 1998 Administrative Code established administrative responsibility for illegal personal data processing. In July 2000 the Law on the Amendment Law on Legal Protection of Personal Data was adopted, which in its essence is harmonised with EC law. In February 2001 Seimas adopted the Law on the ratification of Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data (ETS No 108).

In September 2001 the Government restructured the SDPI into an independent governmental institution and determined that the maximum number of staff to 22. The present structure of the SDPI consists of 21,5 staff. The director heads the SDPI. Under direct subordination of the director there is the deputy director and head of department of internal administration. The head of the control department and head of the information department are directly subordinated for the deputy director. Under
the head of the control department 6 chief inspectors (4 lawyers and 2 IT specialists) are directly subordinated. Chief specialist for information, chief inspector for the international co-operation, legal adviser and chief inspector for the register are directly subordinated under the head of the information department. Chief inspector for the international co-operation and chief inspector for the register have one directly subordinated senior inspector. There are 5,5 staff (5 –full time and 1 – part time) in the department of internal administration.

The inspections on the legality of data processing are carried out by inspectors, which shall be guided by the Regulations on inspections of the legal data processing and methodology on the carrying out inspections approved by the Director of the SDPI. Decisions on the submission of protocol on the violation of the administrative code to the court and instructions or recommendations to the data controllers are made by the Director of the SDPI or empowered by the Director the Deputy director.

In addition to the officials of the SDPI, Judges and personal data controllers from state institutions and private sector will also participate in seminars conducted under this project.

**Sub-component 2: IT and Electronic Data Security**

The project will include representatives of different state institutions responsible for the management of the main state registers, information systems, IT infrastructure. The list of institutions among other will include all ministries, the Bank of Lithuania, Seimas Office, Government Office, President Office, etc. The detailed list of the institutions involved will be prepared before the start of preparation of the Twinning Covenant.

The main institution responsible for the implementation of this project will be the Information Policy Department of the Mol. The Department’s responsibilities among others include framing of information society’s development policy, development and implementation of e-government, implementation of electronic signature and personal identification system, co-ordination and information systems and registers, also preparation of legal acts which are necessary for development of IT infrastructure.

Currently the Department consists of 13 employees, but it is planned that it will be expanded to 25 employees. At the moment the Department has three divisions: Information Systems Division, Information Infrastructure Planning Division and Information Technologies Security Division. With the expansion of the department two additional units are planned: Security Accreditation Authority and Security Consultation Division.

Since the project consists from two sub-components, each of them will have its own Steering group. The Steering group for Sub-component 1 will be chaired by the representative of State Data Protection Inspectorate. This steering group preliminary will include the representatives from the SDPI, Ministry of Interior, Ministry of Justice, Department of Courts, Lithuanian Free Market Institute and other beneficiary institutions.

Steering group for Sub-component 2 will be chaired by the representative of Information Policy Department of the Mol. This steering group preliminary will include the representatives from other departments of the Ministry of Interior, SDPI and the Bank of Lithuania. The final list will be prepared before the Twinning Covenant is signed.
Both Steering groups will have regular meetings at least once per month and more often if necessary. The two groups will also form a Joint Steering Committee in order to co-ordinate and discuss their activities, when it is necessary for successful achievement of project objectives.

5. Budget (in € million)

<table>
<thead>
<tr>
<th>Project Components</th>
<th>Investment Support</th>
<th>Institution Building</th>
<th>Total Phare (I+IB)</th>
<th>National Co-financing</th>
<th>IFI</th>
<th>TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Twinning for Sub-component 1</td>
<td>0.60</td>
<td>0.60</td>
<td></td>
<td></td>
<td></td>
<td>0.60</td>
</tr>
<tr>
<td>Twinning for Sub-component 2</td>
<td>0.70</td>
<td>0.70</td>
<td></td>
<td></td>
<td></td>
<td>0.70</td>
</tr>
<tr>
<td>Supply for Sub-Component 2</td>
<td>0.40</td>
<td>0.40</td>
<td>0.135</td>
<td></td>
<td></td>
<td>0.535</td>
</tr>
<tr>
<td>TOTAL</td>
<td>0.40</td>
<td>1.30</td>
<td>1.70</td>
<td>0.135</td>
<td></td>
<td>1.835</td>
</tr>
</tbody>
</table>

The Phare amount is binding as a maximum amount available for the project. The ratio between the Phare and national co-finance amounts is also binding and has to be applied to the final contract price.

The national co-financing commitment is a tax-excluded net amount.

6. Implementation Arrangements

6.1. Implementing Agency

**PAO:** Zilvinas Pajarskas  
Director of Central Financing and Contracting Unit under the Ministry of Finance  
Address: J.Tumo-Vaižganto 8A/2  
2600 Vilnius  
Lithuania  
Telephone: 370 2 685367  
Fax: 370 2 225335  
e-mail: info@cfcu.lt

**SPO:** Ona Jakštaitė  
Director of State Data Protection Inspectorate  
Address: Gedimino pr. 27/2  
2600 Vilnius  
Lithuania  
Telephone: 370 5 2127532  
Fax: 370 2 619494  
e-mail: jakstaite@ada.lt

(SPO: Sector Programme Officer)

6.2. Twinning

6.2.1. Sub-component 1: Personal Data Protection

The beneficiary institution is the State Data Protection Inspectorate. Director of the SDPI O.Jakštaitė Tel: +370 5 2127532, Fax: +370 2 619494, E-mail: jakstaite@ada.lt;  
The contact person will primarily be: B.Jurgeleviciene, Senior inspector of the SDPI Tel: +370 2 626516, Fax: +370 2 619494, E-mail: jurgeleviciene@ada.lt;
Sub-component 2: IT and Electronic Data Security

The Twinning Team will be located in the Information Policy Department of the MoI. The contact person for the Twinning Component will be Mr. Aurimas Matulis - Director of Information Policy Department of the MoI; tel. 370 2 620443; fax: 370 2 625944; e-mail: aurimas@iid.lt.

6.3. Non-standard aspects

There are no non-standard aspects in the implementation of this project. PRAG and Twinning Manual will be applied fully. The project has 3 components: 2 Twinning Components of a total value of 1.3 MEUR and 1 Investment Component.

6.4. Contracts

There are 3 contracts foreseen for the implementation of these project activities:

<table>
<thead>
<tr>
<th>Component</th>
<th>Start of Tendering</th>
<th>Start of Project Activity</th>
<th>Project Completion</th>
</tr>
</thead>
<tbody>
<tr>
<td>Twinning for Sub-component 1</td>
<td>3Q/02</td>
<td>1Q/03</td>
<td>3Q/04</td>
</tr>
<tr>
<td>Twinning for Sub-component 2</td>
<td>3Q/02</td>
<td>1Q/03</td>
<td>3Q/04</td>
</tr>
<tr>
<td>Supply for Sub-component 2</td>
<td>2Q/03</td>
<td>4Q/03</td>
<td>2Q/04</td>
</tr>
</tbody>
</table>

7. Implementation Schedule

8. Equal Opportunity

The institution involved in the project execution will observe equal opportunity of men and women in its recruitment and human resources development. The beneficiary will also ensure equal access of men and women to the project activities and results.

9. Environment

The investment component of this project relates to institution building activities.

10. Rates of Return

The investment component of this project relates to institution building activities.

11. Investment Criteria

The investment component of this project relates to institution building activities.

12. Conditionality and sequencing

Sub-component 1: Personal Data Protection

Before the implementation of this sub-component full alignment with Community acquis, including full independence of the Supervisory authority of data protection (State
Data Protection Inspectorate) shall be ensured by the adoption of the Law on the Amendment Law on Legal Protection of Personal Data.

**Sub-component 2: IT and Electronic Data Security**

Lithuanian side will contribute € 0.135 Million in line with the Phare co-financing requirements.
Annexes to project Fiche

1. Logical framework matrix in standard format
2. Detailed implementation chart
3. Contracting and disbursement schedule
4. Reference to feasibility /pre-feasibility studies
<table>
<thead>
<tr>
<th>Overall objective</th>
<th>Objectively verifiable indicators</th>
<th>Sources of Verification</th>
<th>Assumptions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Personal Data protection, IT and Electronic Data security corresponds to EU requirements and operates effectively.</td>
<td>• Personal Data protection, IT and Electronic Data security systems corresponds to the best Member States practice</td>
<td>National and EU reports, statistics, studies.</td>
<td>Political support, Co-operation with mass media. Lithuanian Government will ensure maintenance of the equipment</td>
</tr>
<tr>
<td><strong>Immediate objective</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Personal Data Protection</strong></td>
<td>• Strengthen the administrative capacity of the State Data Protection Inspectorate to enforce legislation in data protection, in particular by the provision of training;</td>
<td>Legislation enacted.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Increase the awareness of the Lithuanian administration, personal data controllers and the public concerning personal data protection.</td>
<td>Member States practice in the relevant fields introduced.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>IT and Electronic Data Security</td>
<td>• Increase administrative capacity of Information Policy Department of the MoI</td>
<td>Society informed about Personal Data protection.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Align Lithuanian IT and data protection system with the Acquis and international requirements</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Increase administrative and operational capacities of state institutions working with IT and data security.</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Ensure proper IT and data security level.</td>
<td></td>
</tr>
<tr>
<td><strong>Results</strong></td>
<td><strong>Objectively verifiable indicators</strong></td>
<td><strong>Sources of Verification</strong></td>
<td><strong>Assumptions</strong></td>
</tr>
<tr>
<td>Personal Data Protection</td>
<td>• Efficient and professional work of the Data Protection Supervisory Authority reflecting current good practice in Member States ensured;</td>
<td>Project reports, Equipment delivery reports.</td>
<td>Draft legislation enacted as planned.</td>
</tr>
<tr>
<td></td>
<td>• Effective supervision of the activities relating to the processing of personal data ensured, qualification of the data protection Supervisory Authority inspectors raised, their professional skills and knowledge improved;</td>
<td></td>
<td>Trained staff can be retained in the medium and long-term</td>
</tr>
<tr>
<td></td>
<td>• Awareness on data protection requirements and procedures increased among judges, government agencies, businesses and the general public.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>IT and Electronic Data Security</td>
<td>• Recommendations for improvement of existing legal acts in line with EU requirements and international standards prepared.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Methodology manual on IT and Electronic Data security evaluation prepared.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Requirements manual on IT and Electronic Data security evaluation prepared.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Training programmes prepared and training of staff conducted informational web portal operational.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Hardware and software installed and fully operational.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Commentaries, proposals and strategy for the relevant areas drafted.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• 15 persons in Data Protection Supervisory Authority, 70 data controllers and judges trained.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Seminars on personal data protection conducted, public information campaign organised.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>IT and Electronic Data Security</td>
<td>• Gaps Analysis documented.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Review of existing legal acts conducted and recommendations for their amendment documented.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Methodology on IT and Electronic Data security evaluation accepted.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Requirements for IT and Electronic Data security evaluation accepted.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• 15 experts working in IT security evaluation and consulting institution trained.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Persons working with IT and Electronic Data security in different state institutions have raised their qualification (approximately 200 persons)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Hardware and software received in time, and at the required quality, as planned.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Activities

**Personal Data Protection**
- Analysis of training needs, provide necessary training (including one month term secondments of 2-4 inspectors in the Data Protection Supervisory Authorities of EU Member States); 1) on carrying out the control of the personal data processing based on the best practice of the EU Member States; 2) on carrying out the prior checking;
- Preparation of training programs on carrying out control and prior checking;
- Preparation and conduction of seminars to the data controllers, data protection supervisory authorities and judges;
- Creation of the public information strategy and information material;
- Preparation of the Commentaries on the Law on Legal Protection of Personal Data of the Republic of Lithuania based on Directive 95/46/EC and Convention ETS No 108 to ensure clarification and effective application of the Law in practice;
- Analysis and preparation of proposals on the Collective Administration System of the supervision of information;
- Creation of the outline of data security conformity evaluation system.

**IT and Electronic Data Security**
- Evaluation of existing situation in the field of IT and Electronic Data security.
- Revision of existing and preparation of new necessary legislation regulating sphere of IT and Electronic Data security;
- Preparation of methodology on IT and Electronic Data security evaluation.
- Preparation of requirements for IT and Electronic Data security evaluation.
- Preparation of training programmes and training of staff.
- Study visits to Member States.
- Purchase of necessary hardware and software.

### Means

2 Twinning arrangements: 1.5 year PAA and 12 p/m STE input, one 1.5 year PAA and 38 p/m STE inputs.
One Supply contract.

### Assumptions

Successful start and smooth implementation of the project.

### Preconditions

Full alignment with Community acquis in the area of Personal Data Protection including full independence of the Supervisory authority of data protection (State Data Protection Inspectorate)
Adequate staff resources
Co-financing available

Prepared by the State Data Protection Inspectorate and the Ministry of Interior, 14/05/02
Annex 2
Detailed Implementation Chart for the Project

<table>
<thead>
<tr>
<th>Year</th>
<th>2002</th>
<th>2003</th>
<th>2004</th>
<th>2005</th>
</tr>
</thead>
<tbody>
<tr>
<td>Month</td>
<td>7 8 9 10 11 12</td>
<td>1 2 3 4 5 6 7 8 9 10 11 12</td>
<td>1 2 3 4 5 6 7 8 9 10 11 12</td>
<td>1 2 3 4 5 6</td>
</tr>
<tr>
<td>Twinning for Sub-component 1</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Twinning for Sub-component 2</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Supply for Sub-component 2</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

definition
tendering
implementation
CUMULATIVE CONTRACTING AND DISBURSEMENT SCHEDULE (€ 1.7 Million)

<table>
<thead>
<tr>
<th></th>
<th>2002</th>
<th>2003</th>
<th>2004</th>
<th>2005</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>30/06</td>
<td>30/09</td>
<td>31/12</td>
<td>31/03</td>
</tr>
<tr>
<td><strong>Contracting</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Twinning for Sub-component 1</td>
<td>0.6</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Twinning for Sub-component 2</td>
<td>0.7</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Supply Sub-component 2</td>
<td></td>
<td></td>
<td>0.4</td>
<td></td>
</tr>
<tr>
<td><strong>Total contracting (cumulative)</strong></td>
<td>1.3</td>
<td>1.3</td>
<td>1.3</td>
<td>1.7</td>
</tr>
<tr>
<td><strong>Disbursement</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Twinning for Sub-component 1</td>
<td>0.2</td>
<td>0.257</td>
<td>0.314</td>
<td>0.371</td>
</tr>
<tr>
<td>Twinning for Sub-component 2</td>
<td>0.23</td>
<td>0.297</td>
<td>0.364</td>
<td>0.431</td>
</tr>
<tr>
<td>Supply Sub-component 2</td>
<td></td>
<td></td>
<td>0.24</td>
<td>0.24</td>
</tr>
<tr>
<td><strong>Total disbursement (cumulative)</strong></td>
<td>0.43</td>
<td>0.554</td>
<td>0.678</td>
<td>1.042</td>
</tr>
</tbody>
</table>
Reference to Feasibility/Pre-feasibility Studies

Sub-component 2: IT and Electronic Data Protection

Preliminary evaluation for the equipment was conducted by Information Policy Department of the MoI in consultation with the state enterprise “Infrastruktūra”, which operates state institutions computer network. The evaluation was conducted in 2001.

Preliminary list of hardware and software

<table>
<thead>
<tr>
<th>Hardware</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Firewall servers</td>
<td>50 000</td>
</tr>
<tr>
<td>Intrusion detection system servers</td>
<td>75 000</td>
</tr>
<tr>
<td>Application servers</td>
<td>65 000</td>
</tr>
<tr>
<td>Web servers</td>
<td>50 000</td>
</tr>
<tr>
<td>Virtual networking hardware</td>
<td>30 000</td>
</tr>
<tr>
<td>Secure routing and switching hardware</td>
<td>30 000</td>
</tr>
<tr>
<td>Software</td>
<td></td>
</tr>
<tr>
<td>Firewall system</td>
<td>40 000</td>
</tr>
<tr>
<td>Intrusion detection system</td>
<td>50 000</td>
</tr>
<tr>
<td>Network security solutions</td>
<td>65 000</td>
</tr>
<tr>
<td>Operation systems</td>
<td>20 000</td>
</tr>
<tr>
<td>Web portal solutions</td>
<td>35 000</td>
</tr>
<tr>
<td>Systems tuning</td>
<td>25 000</td>
</tr>
<tr>
<td>Total (€)</td>
<td>535 000</td>
</tr>
</tbody>
</table>