

Expert opinion

of Prof. Tsvetan Iliev, PhD on the procedure for obtaining the educational and scientific degree “Doctor” in the field of higher education 3. “Social, economic and legal sciences”, professional field 3.8 “Economics”, scientific specialty (PhD program) “Economics and Management (Industry)”.

This opinion has been prepared in my capacity as a member of the scientific jury, determined by Order № 209/05.11.2025 of the Rector of IBS – Botevgrad, and meets the requirements of Art. 10 para. 1 of LDASRB and art 32 para. 1 of the Regulations for its application.

Candidate for the procedure: Milena Svetlomirova Mitkova

Topic of the dissertation: SPECIFIC FEATURES IN THE APPLICATION OF THE PERSONAL DATA PROTECTION REGIME UNDER THE GENERAL DATA PROTECTION REGULATION IN ACCOUNTING ACTIVITIES

SCIENTIFIC SUPERVISORS: Prof. Irina Tsakova, PhD

Assoc. Prof. Daniela Georgieva, PhD

I. Evaluation of the structure of the dissertation

Structurally, the dissertation presented to my attention has achieved a relatively good balance. The main elements are: introduction, three-chapter exposition, conclusion, bibliography and appendices. The total volume is 240 pages, of which 155 pages are the main part, 20 pages are bibliography and 51 pages are appendices. A good certificate for a doctoral student is the fact that he or she is familiar with the scientific works on the topic of other researchers. Evidence of this is the content of the bibliography. It includes 169 literary sources, normative documents and online resources, including 22 in Bulgarian, 57 in Latin, 31 Internet resources and 59 normative documents. 5 appendices have been developed for the dissertation. The main text includes 23 tables and 20 figures. This demonstrates doctoral student Mitkova's ability to systematize information and apply graphic methods for its visualization.

In terms of structure, I can say that the dissertation has a complete and complete appearance, corresponding in terms of requisites to the requirements for such a development and complies with the adopted practice at the IBS.

II. Evaluation of the content of the dissertation

I consider the problem studied in the dissertation to be particularly relevant. This is due to the fact that the development of information and communication technologies presupposes the emergence of new digital tools for collecting, processing and storing personal data. Moreover, the digital transformation we are witnessing these days affects all aspects of business relationships at the national and international levels. In particular, it fully affects accounting. As doctoral student Mitkova points out, "the implementation of new accounting software solutions for collecting, processing and storing data creates risks for information security, due to the vulnerability of systems to cyberattacks and unauthorized access, which can compromise stored financial information and personal data."

The aim of the doctoral dissertation is a theoretical and practical study and analysis of specific features in the implementation of the personal data protection regime under the General Regulation in accounting activities, with a focus on the impact of digitalization in specialized enterprises in Bulgaria. I believe that it is well defined and shows the focus of the dissertation research.

In order to achieve the main goal thus set, doctoral student Mitkova has planned the implementation of the following tasks:

1) to identify the priority digital technologies used in accounting activities in order to outline the main advantages, disadvantages and risks to the security of personal information from digitalization in accounting;

2) to clarify the essence and meaning of the concept of "personal data" in order to more clearly define the information subject to collection, storage, processing and protection by accountants in Bulgaria;

3) to examine the emergence and development of legislation on the protection of personal information in Europe and Bulgaria and the possible obstacles to compliance with the regulatory framework by specialized enterprises in Bulgaria;

4) to distinguish accounting activities in specialized companies based on the transactions and events carried out with persons internal and external to the reporting unit. Among all external parties, a more in-depth analysis is carried out on relations with customers, suppliers and some other counterparties. Among the group of internal parties, the subject of analysis is the personnel of the enterprises;

5) to study appropriate practices regarding personal information security measures relevant to the accounting sector and to provide guidelines for the creation of a Code of Conduct taking into account the specificities of the processing of personal data in accounting.

I can say that the tasks fully correspond to what is stated in the content plan for the individual chapters of the dissertation and imply the achievement of the main and additional goals.

The object and subject of the dissertation work are well defined and there is a direct connection to the goal and objectives.

The subject of the dissertation research is the characteristic features of accounting activities in specialized accounting firms, in their capacity as persons responsible for personal

data protection. The subject matter is defined as the currently applicable practices and procedures in accounting activities that are directly related to the collection, storage and processing of personal data of third parties. In addition, the main sources and technical means for collecting and processing types of personal information are examined based on whether the individuals are internal or external to the reporting unit.

The main thesis that doctoral student Mitkova defends in her dissertation is that digitalization in accounting creates risks in the processing of personal data, which require a systematic analysis of the legal framework and the principle of accountability with a view to forming effective practices for information protection. According to her, this will assist accountants in understanding and fulfilling their obligations under the confidentiality legislation and will increase the trust of data subjects in the privacy and protection of the information stored and processed about them.

To prove her thesis, doctoral student Mitkova tested 6 working hypotheses presented in the introduction to the dissertation. They are well formulated, which contributed to the formation of a clear logical concept of the work. In parallel, the limitations of the study were also determined.

I can report the research methods used as appropriate for testing the hypotheses under consideration and have contributed to the obtained results and contributions.

The first chapter of the dissertation, entitled "**Essence, Significance and Regulatory Framework of Personal Data Protection**", is well developed. It is theoretical in nature. The focus of attention in it is placed on the study of specialized literary sources and on this basis the essence, significance and development of the legal framework for the protection of personal data in Europe and Bulgaria are presented. An attempt has also been made to assess its impact internationally. Digital technologies used in accounting have been studied, with attention paid to the risks they pose to the confidentiality and security of personal information.

Based on the etymology and meaning of the concepts of "information" and "data" and on concepts for interpreting the term "personal data" in the context of EU data protection law, a proposal is made for a definition of the two concepts for accounting purposes.

The presentation of the first chapter addresses three of the research tasks presented in the introductory part of the study: the priority digital technologies used in accounting activities have been identified and the main advantages, disadvantages and risks for the security of personal information from digitalization in accounting have been outlined; the essence and meaning of the concept of "personal data" are presented in order to more clearly define the information subject to collection, storage, processing and protection by accountants in Bulgaria; the processes of development and evolution of legislation on the protection of personal information in Europe and Bulgaria and the possible obstacles to compliance with the regulations by specialized enterprises in Bulgaria were studied.

At the end of this part of the dissertation, the relevant conclusions are drawn based on what is presented therein.

From what is seen in terms of content in the first chapter, I can conclude that it represents a good theoretical basis for conducting empirical research on the dissertation problem.

The second chapter of the dissertation is entitled "**Essence and features of procedures for compliance with the legal framework for the protection of personal data by accounting firms**". In my opinion, this part of the paper is of a theoretical and methodological nature. The specific features of the application of the personal data protection regime in accounting activities are presented and analyzed, as well as the role of accounting firms in their capacity as administrators of personal information. In this regard, a distinction has been made between the activities in specialized accounting firms based on interaction and communication with external and internal parties to the organization regarding data protection. Good practices have been studied and, on this basis, measures for protecting information when processing personal data and the functions and requirements for data protection officials in accounting firms have been determined.

From what is presented in the second chapter of the dissertation, doctoral student Mitkova has completed the following research tasks: a distinction has been made between accounting activities in specialized companies based on transactions and events carried out with internal and external parties to the reporting unit; of all external parties, a more in-depth analysis has been made of relationships with customers, suppliers and some other external parties; from the group of insiders, the subject of analysis is the personnel of the enterprises; appropriate practices regarding technical, documentary and organizational measures for the security of personal information concerning the accounting sector have been studied.

At the end of the second chapter, some important conclusions are drawn and recommendations are made. This, once again, I can define as a good certificate for the research skills formed by Milena Mitkova.

The third chapter of the dissertation is entitled "**Research on the measures and procedures applied in compliance with the legal framework for the protection of personal data by specialized accounting firms in Bulgaria**". This chapter is inherently practical. It conducts an empirical study to analyze the practices and procedures applied in the accounting sector, to identify appropriate measures for the protection of personal data and to assess the impact of digitalization on information confidentiality. To this end, doctoral student Mitkova has studied the possibilities for implementing good practices by accountants to ensure security in accordance with regulatory requirements. По-конкретно, извършено е онлайн анкетно анонимно проучване на текущо прилаганите мерки и процедури по защита на личната информация от специализирани счетоводни предприятия. То е осъществено в периода 09.02.2021 – 08.05.2022 г. The author developed the questionnaire, which was distributed online via Google Forms and consisted of 44 open and closed questions, grouped into four groups. The study involved 107 respondents, randomly selected using the response method. The target group is representatives of accounting firms and their employees, members of the accounting organization "Institute of Professional Accountants in Bulgaria". To test the hypotheses, Cramer's X^2 analysis of statistical relationships and dependencies was used.

The results of the study gave the doctoral student the opportunity to test two of her hypotheses. Based on the collected and analyzed data and using the above-mentioned methodology for checking statistical relationships and dependencies, it is established that there

is a weak statistically significant relationship between the studied possible risk to information security and encryption, with respect to electronic communication. When considering the presence of a higher level of data security risk during processing (such as unauthorized disclosure or access to transferred, stored or otherwise processed personal data), the surveyed companies take appropriate measures, in accordance with the legislative proposals. Milena Mitkova pointed out that the goal here is to reduce, limit or eliminate the possibility of unwanted threats.

The verification of a statistically significant relationship between the respondents' vision of the accounting sector's susceptibility to cyberattacks and the presence of testing and evaluation of the effectiveness of the measures created in enterprises once again confirms the formulated hypothesis, although the established relationship is weak.

The results achieved in the analysis allowed doctoral student Mitkova to conclude that the tested hypotheses are confirmed by the results of the empirical study.

As a positive circumstance related to the above, I can identify the assessment of the weaknesses and gaps regarding the compliance of the personal data protection marks used by specialized accounting firms with the legislative framework in the field. With the importance of an important contributing point, I define the recommendations made for their removal.

Based on the results achieved and analyses from the previous paragraph of the third chapter, the author has identified the need to conduct a second survey, which focuses on the current state of digitalization, automation and innovation in accounting companies in Bulgaria and the risk to the confidentiality of personal data from the application of new technologies. With this study, M. Mitkova aims to answer the question: whether the implementation of technological, digital and process-based achievements in accounting activities poses a threat to the accuracy, correctness, integrity and privacy of personal data, in accordance with the analysis of the literary sources from the previous two chapters.

The survey was also conducted online. A new questionnaire with 14 questions was prepared. 212 respondents participated, selected randomly using the response method. The target group is accountants representing accounting firms and their employees. To test the hypotheses, Cramer's X^2 analysis of statistical relationships and dependencies was used.

In this way, the hypothesis of the existence of a statistically significant relationship between the implementation of digital solutions based on new digital technologies for collecting, processing and storing data by specialized accounting firms over the last 2 years was tested and increasing cyber risks to information privacy in the sector under consideration. The results enabled the doctoral student to establish that no such statistically significant relationship exists.

The third type of research conducted in this part of the dissertation is on the possibilities for improving and maintaining a high level of competence and professional skills in personal data protection by accountants. For this purpose, in-depth interviews were conducted with 10 participants in the period 07.06.2024-16.06.2024. The interviewees were selected based on their professional qualifications, experience in the field of accounting and knowledge regarding personal data protection in specialized accounting firms. The target group was selected as practicing accountants, representing and managing accounting firms or employed personnel in them.

The results of the study allow M. Mitkova to once again confirm the hypotheses set out in the dissertation research that the assessment of the risks of personal data processing when using innovations in accounting is a prerequisite for selecting appropriate technical, organizational, documentary and personal measures to protect personal data. The survey participants also confirm the assumption that the interpretation of specific regulatory postulates by accountants is an obstacle to reliable and effective implementation of information protection rules. Doctoral student Mitkova also reports that this is a way to gather useful information about the channels through which accountants learn about innovations in the sector, about specific difficulties encountered in understanding legislation in the field of confidentiality.

The research conducted has enabled the doctoral student to formulate several recommendations, which I can define as having a contributing character. They are:

- take action to disseminate messages about providing training in the field of information and communication technologies, cybersecurity and personal data protection in a wider range of information channels, including social media and professional accounting organizations;
- to organize training for data protection officers on a voluntary basis, but by an institution/organization that is accredited by a supervisory authority and the training is carried out according to pre-approved programs and with clear criteria for improving knowledge, skills and proving professional qualifications after passing a formal exam;
- to prepare a Code of Conduct by a trade organization for the accounting sector.

The conclusion of the dissertation summarizes the conclusions and recommendations made in the individual chapters.

III. Evaluation of the contribution of the dissertation work

I consider the scientific contributions presented in the reference in five areas to be fully consistent with what was shown in the dissertation. They are of a theoretical and practically applied nature.

IV. Evaluation of the abstract

The abstract is 55 standard pages long and contains all the necessary details for such a development. It meets the requirements and accepted practice at the Bulgarian Academy of Sciences.

V. Evaluation of the publishing activity of the PhD student

In the list of publications on the topic of the dissertation, doctoral student M. Mitkova has indicated four works, including studies, 2 articles and one scientific report. They are author's publications that have found a place on the pages of valuable Bulgarian scientific publications.

I believe that this scientific work covers and even exceeds the quantitative and qualitative scientometric indicators for awarding the ONS "Doctor". In reviewing and evaluating it, I have not identified practices indicating a violation of scientific ethics.

VI. Critical notes and recommendations

Milena Mitkova's dissertation work is developed at a high scientific level, is complete in nature, and contains undeniable scientific contributions. Overall, I have no critical remarks.

VII. Final conclusion

In conclusion, I believe that **PhD student Milena Mitkova meets the requirements for the award of the educational and scientific degree "Doctor" in the scientific specialty (doctoral program) "Economics and Management (Industry)" and possesses the necessary personal and professional qualities. Given this, I propose to the esteemed members of the Scientific Jury to support the awarding of the educational and scientific degree "doctor" to Milena Mitkova on the basis of Chapter Two of the Act on the Development of the Academic Staff in the Republic of Bulgaria.**

29.12.2025

Sofia

Prepared the expert opinion:

/Prof. Tsvetan Iliev, PhD/

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