Data Privacy Act Compliance Report

Document: CLUSTER 3 - DUMALAG - Sheet1.pdf

Analysis Date: 2025-05-30

Compliance Status: NON-COMPLIANT

Risk Level: CRITICAL

Summary Statistics

Metric	Count
Total PII Instances	191
Sensitive PII Instances	0
Regular PII Instances	191
Total Violations	8
Consent Indicators	0
Purpose Indicators	0

Executive Summary

The document 'CLUSTER 3 - DUMALAG - Sheet1.pdf' has been analyzed for compliance with the Republic Act No. 10173 (Data Privacy Act of 2012). The analysis indicates that the document is **NON-COMPLIANT** with DPA requirements and requires immediate attention.

Key Findings:

• 191 instances of personal information detected
• 0 instances of sensitive personal information found
• 8 DPA violations identified
• Risk level assessed as: CRITICAL

Immediate Actions Required:

• Implement proper consent mechanisms: Establish clear, specific, and informed consent procedures before collecting personal information
• Enhance transparency and data subject notifications: Provide clear information about data processing purposes, methods, and data subject rights
• Implement comprehensive security measures: Deploy organizational, physical, and technical safeguards to protect personal information

Personal Information Analysis

Regular Personal Information:
• PERSON: MARISSA BINONDO SANTOS (Confidence: 0.85)
• PERSON: DONALD CELIS SANTOS (Confidence: 0.85)
• PERSON: ARNULFO SIANO (Confidence: 0.85)
• PERSON: DONALD SANTOS (Confidence: 0.85)
• PERSON: SOSMEÑA SIANO (Confidence: 0.85)
• PERSON: PAZ (Confidence: 0.85)
• PERSON: ALFREDO AMAROTO SIANO (Confidence: 0.85)
• PERSON: JR (Confidence: 0.85)
• PERSON: SIANO BERNARDO (Confidence: 0.85)
• PERSON: FELICIANO JACA AÑORA (Confidence: 0.85)

Consent Indicators:
• No consent indicators found

Purpose Indicators:
• No purpose indicators found

DPA Violations Identified

Violation 1: Criteria for Lawful Processing of Personal Information

Section: 12
Severity: HIGH
Description: Personal information appears to be processed without clear consent from data subjects
Details: No details available

Violation 2: Rights of the Data Subject

Section: 16
Severity: MEDIUM
Description: Data subjects may not be adequately informed about data processing
Details: No details available

Violation 3: Security of Personal Information

Section: 20
Severity: HIGH
Description: Document does not demonstrate adequate security measures for personal information
Details: No details available

Violation 4: Section 11

Section: Section 11
Severity: HIGH
Description: The document lists personal information without specifying the purpose of collection or processing. This violates the principle of transparency and legitimate purpose.
Details: Section 11: General Data Privacy Principles

Violation 5: Section 12

Section: Section 12
Severity: CRITICAL
Description: There is no evidence that the data subjects have given their consent for the processing of their personal information, nor is there any indication of another lawful basis for processing.
Details: Section 12: Criteria for Lawful Processing of Personal Information

Violation 6: Section 13

Section: Section 13
Severity: CRITICAL
Description: The document contains sensitive personal information (e.g., full names which can be considered sensitive in certain contexts) without any indication of consent or legal basis for processing.
Details: Section 13: Sensitive Personal Information and Privileged Information

Violation 7: Section 16

Section: Section 16
Severity: HIGH
Description: The data subjects have not been informed about the processing of their personal information, nor have they been provided with the necessary information as required by the DPA.
Details: Section 16: Rights of the Data Subject

Violation 8: Section 21

Section: Section 21
Severity: HIGH
Description: The document does not provide any information on who is responsible for the personal information, nor does it indicate that contractual or other reasonable means have been used to ensure a comparable level of protection.
Details: Section 21: Principle of Accountability

Recommendations

CRITICAL Priority Actions

Implement proper consent mechanisms
Description: Establish clear, specific, and informed consent procedures before collecting personal information
Reference: Section 12 - Criteria for Lawful Processing

Obtain Consent
Description: Immediately obtain explicit consent from all data subjects whose personal information is listed in the document. Ensure that the consent is freely given, specific, and informed.
Reference: Section 12

HIGH Priority Actions

Enhance transparency and data subject notifications
Description: Provide clear information about data processing purposes, methods, and data subject rights
Reference: Section 16 - Rights of the Data Subject

Implement comprehensive security measures
Description: Deploy organizational, physical, and technical safeguards to protect personal information
Reference: Section 20 - Security of Personal Information

Specify Processing Purpose
Description: Clearly specify the purpose of collecting and processing the personal information. Ensure that the purpose is legitimate and compatible with the data subjects' expectations.
Reference: Section 11

Inform Data Subjects
Description: Inform all data subjects about the processing of their personal information. Provide them with the necessary information as required by the DPA.
Reference: Section 16

Establish Accountability
Description: Establish clear accountability for the personal information. Ensure that contractual or other reasonable means are used to provide a comparable level of protection.
Reference: Section 21

MEDIUM Priority Actions

Conduct data protection impact assessment
Description: Evaluate the risks and implement appropriate measures for personal data processing
Reference: Section 11 - General Data Privacy Principles

Implement Security Measures
Description: Implement reasonable and appropriate security measures to protect the personal information from unauthorized access, alteration, or disclosure.
Reference: Section 20

Appendix: Technical Details

DPA Sections Referenced:
- 12
- 16
- 20
- Section 11
- Section 11 - General Data Privacy Principles
- Section 12
- Section 12 - Criteria for Lawful Processing
- Section 13
- Section 16
- Section 16 - Rights of the Data Subject
- Section 20
- Section 20 - Security of Personal Information
- Section 21

Analysis Methodology:
This analysis was conducted using automated tools that: 1. Extract text from uploaded documents (PDF, DOCX, images) 2. Detect personal information using pattern recognition and NLP 3. Identify Philippine-specific PII (TIN, SSS, PhilHealth numbers) 4. Check for consent and purpose indicators 5. Apply DPA compliance rules to identify violations 6. Generate risk assessments and recommendations