



Davao del Norte State College

DATA PRIVACY MANUAL

VISION

A premier Higher Institution in Agri-Fisheries and Socio-cultural Development in the ASEAN Region.

MISSION

DNsc strives to produce competent human resource, generate, and utilize knowledge and technology, uphold good governance and quality management system for sustainable resources and resilient communities.

CORE VALUES

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Chapter 1  
Introduction

This Privacy Manual is hereby adopted in accordance with the mission and vision of the College and in compliance with Republic Act No. 10173, or the Data Privacy Act of 2012 (DPA), its implementing Rules and Regulations, and other relevant policies, including issuances of the National Privacy Commission (NPC). The College respects and values the data privacy rights of its employees, students, alumni, stakeholders, and individuals who permit their personal information to be processed in its usual operations. It ensures that the general principles of transparency, legitimate purpose, proportionality, and legal necessity process these rights.

Chapter 2  
Definition of Terms

This Manual adopts the definitions found in RA 10173 and its implementing rules and regulations. As used in this manual, the following are used under the context and definition below.

**2.1 Data Subject** - is the people whose personal information is collected, stored, and processed.

**2.2 Personal Information (PI)**- refers to any information whether recorded in a material form or not, from which the identity of an individual is apparent or can be reasonably and directly ascertained by the entity holding the information, or when put together with other information would directly and certainly identify an individual.

**2.3 Sensitive Personal Information (SPI)**- refers to personal information:

- a. about an individual's race, ethnic origin, marital status, age, color, and religious, philosophical or political affiliations;
- b. about an individual's health, education, genetic or sexual life of a person, or to any proceeding for any offense committed or alleged to have been committed by such person, the disposal of such proceedings, or the sentence of any court in such proceedings;
- c. issued by government agencies peculiar to an individual which includes, but not limited to, social security numbers, previous or current health records, licenses or its denials, suspension or revocation, and tax returns; and
- d. specifically established by an executive order or an act of Congress to be kept classified.

**2.4 Personal Information Controller (PIC)** - refers to a person or organization who controls the collection, holding, processing or use of personal information, including a person

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or organization who instructs another person or organization to collect, hold, process, use, transfer or disclose personal information on his or her behalf.

**2.5 Personal Information Processor (PIP)** - refers to any natural or juridical person qualified to act as such under this Act to whom a personal information controller may outsource the processing of personal data pertaining to a data subject.

**2.6 Processing** - refers to any operation or any set of operations performed upon personal information including, but not limited to, the collection, recording, organization, storage, updating or modification, retrieval, consultation, use, consolidation, blocking, erasure or destruction of data.

**2.7 Privileged Information** - refers to any and all forms of data which under the Rules of Court and other pertinent laws constitute privileged communication.

### Chapter 3 SCOPE AND LIMITATIONS

All employees of this College, including permanent faculty, part-time faculty, staff, contract service employees, and those on job orders, must adhere to the terms outlined in this Privacy Manual.

This manual covers students to the extent that its provisions apply to them as students, student assistants, or members of student organizations under the supervision of any employee of this College. Additionally, it applies to individuals who transact publicly within this College. Furthermore, alumni, researchers engaged in research at the College, contract counterparties, suppliers, consultants, partners, and retirees are also covered under the provisions of this manual.

Suppose this Manual lacks data privacy policies or provisions. In that case, the Data Privacy Act of 2012, its Implementing Rules and Regulations (IRR), and NPC issuances shall serve as the primary reference for applicable laws and regulations in a given situation.

### Chapter 4 DATA PRIVACY PRINCIPLES

During its operations, the College gathers the required personal details about its staff, personnel, suppliers, contractors, consultants, students, and alumni. The College will utilize the personal information it collects for documenting, recording, and communicating, among other things. The College will guarantee that the personal data in its possession is protected from any

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unintentional or illegal disclosure, alteration, and destruction, in addition to any other unlawful processing.

All employees and personnel of the College must uphold the confidentiality and privacy of all personal data they encounter and acquire, even after resignation or termination of their contract. Personal data held by the College will only be shared for legitimate purposes and with authorized recipients of such information.

**4.1 Principles of Transparency, Legitimate Purpose, and Proportionality**

Processing personal information is permitted if it complies with the guidelines outlined in this manual and any applicable regulations allowing information to be disclosed to the public. It must also adhere to the principles of transparency, legitimacy, and proportionality:

**4.1.1 Transparency:** Data subjects must understand the type, purpose, and extent of the processing of their data, as well as the associated risks and the protections in place. This includes identifying the Personal Information Controller, outlining the rights of data subjects, and explaining how these rights can be exercised. All communications related to the processing of personal data must be clear and easily understandable, using plain language.

**4.1.2 Legitimate Purpose:** Information processing must serve a clearly defined objective that aligns with the law, ethical standards, and public policy.

**4.1.3 Proportionality:** Information processing must be sufficient, relevant, appropriate, necessary, and reasonable, based on a well-defined and detailed objective.

**Chapter 5**  
**PROCESSING OF PERSONAL INFORMATION**

The processing of personal information shall be under the parameters stated below.

**5.1 Notification and Consent**

Any activity involving collecting and processing personal information must first inform the data subject about the purpose and scope of the data collection and processing. This notification is required before proceeding to the next step, which is obtaining the data subject's consent. Consent is required before personal information can be collected and processed, although some legal exceptions exist. The data

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subject can withdraw consent and may provide it explicitly or implicitly.

**5.1.1** Explicit consent is indicated through clear and conventional confirmation methods, such as physical forms validated by the data subject's signature.

**5.1.2** Implicit consent is granted when the data subject has been made aware of the nature and scope of data collection, but obtaining explicit consent is not practical or required. In such instances, consent is assumed if the data subject proceeds with using a particular computer system or service, recognizing the associated data collection.

**5.2 Collection**

**5.2.1** Personal Information of Enrollees, Students, and Alumni: This College may collect relevant personal, medical, and academic records of its enrollees and students and shall further collect and maintain them by their continued admission, re-admission, or enrollment. Additionally, the College may collect such relevant data from its alumni as required by law or the College's normal operations.

**5.2.2** Personal Information of Employees: The College may collect necessary and significant information from its employees as required by law and during their employment, including data relating to their qualifications, personal and medical background, reports and communications, or official documents as may be gathered during their engagement.

**5.2.3** Others: This College may collect pertinent data from persons who may enter any transaction, relation, or agreement with or into any of its premises.

**5.3 Use**

The College shall use any collected data for legitimate purposes only, as directly relevant to its operations, as may be restricted by law or pertinent regulations of the CHED, NEDA, DBM, CSC, COA, among others, and the NPC.

**5.4 Storage, Retention, and Destruction**

The College will protect personal data in its custody from accidental or unlawful destruction, alteration, and disclosure. Considering its nature, it will implement appropriate security measures for storing and destroying personal information. All information collected will not be retained for longer than necessary, except for those that are permanent in nature, which will be retained indefinitely. As a minimum, the College may implement the following methods:

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#### 5.4.1 Storage

Personal information shall be stored securely using appropriate methods to ensure its protection. Hard copies of documents will be kept in designated folders and stored within secured filing cabinets, which shall be accessible only to authorized personnel. Electronic copies (e-copies) of documents shall be stored using secure cloud storage solutions and network storage systems with controlled access permissions. These storage systems shall be maintained with appropriate encryption and security protocols to safeguard data from unauthorized access, breaches, or loss.

#### 5.4.2 Retention

The retention of personal information shall strictly adhere to the retention period stated in the College's approved Records Matrix. The retention periods for different categories of records will be defined in the Records Matrix, ensuring compliance with legal, regulatory, and operational requirements. Records that have surpassed their designated retention period shall be reviewed and processed for disposal by the established guidelines.

#### 5.4.3 Destruction

Records, whether in physical or electronic format, shall be destroyed in accordance with the policies and procedures of the National Archive of the Philippines (NAP). Hard copies of shall be disposed of through secure shredding or incineration to prevent unauthorized access. Electronic records shall be permanently deleted using secure data-wiping methods or digital shredding technologies to ensure they cannot be recovered. The College shall document all destruction processes to maintain accountability and compliance with data protection policies.

### 5.5 Access

The College's data subjects may request access to their personal information. Minors or those of school age may also exercise this right by their authorized representatives or parents.

**5.5.1** Copies of the official academic record may only be accessed and requested officially through the Office of the Registrar. However, for fair evaluation and transparency, the same may be accessed through the following;

- a. The Faculty, for their students, as to the specific course handled only
- b. The Dean and Program Chairs of the Institute for academic evaluation and curriculum management.
- c. The Guidance Services is responsible for providing academic and personal development support.

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- d. The Student Services and Development, for student disciplinary proceedings or official student-related matters.
- e. The Scholarship Office, for eligibility verification and monitoring academic performance.

**5.5.2** Copies of the employee records may only be accessed and requested officially through the Human Resource Management Office (HRMO).

### 5.6 Disclosure and Sharing

Employees of the College are obliged to maintain the confidentiality and secrecy of all personal information they possess, even after their resignation, termination of contract, or other contractual relations.

Personal data under the College's custody shall only be disclosed for a lawful purpose and to authorized recipients. Any personal information processed by the College may only be disclosed and shared by law to persons or entities that are permitted to receive and share it under their legal mandate, including the DBM, CHED, DepEd, TESDA, NEDA, COA, DSWD, PRC, and other relevant government agencies. When personal information is shared with these or other authorized entities, a Data Sharing Agreement (DSA) must be executed to outline the scope, purpose, and security measures governing the data exchange, ensuring compliance with applicable data privacy laws and regulations.

Furthermore, employees with access to or who handle sensitive personal information must sign a Non-Disclosure Agreement (NDA) to emphasize their duty to protect and maintain the confidentiality of such information.

## Chapter 6 SECURITY MEASURES

### 6.1 Organizational Security Measures

**6.1.1 Data Protection Officer (DPO).** The College shall appoint a qualified DPO in compliance with the requirements of RA 10173.

**6.1.2 Functions of the DPO and/or any other responsible personnel with similar functions.**

The DPO shall have the following functions;  
Monitor the College's compliance with the DPA, its IRR issuances by the NPC, and other applicable laws and policies; as such, the DPO may;

- a. Collect information to identify the processing operations, activities, measures, projects,

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- programs, or systems of the College and maintain a record thereof;
- b. Analyze and check the compliance of processing activities, including the issuance of security clearances to and compliance by third-party service providers;
  - c. Inform, advise, and issue recommendations to the College;
  - d. Advise the College as regards the necessity of executing a Data Sharing Agreement with third parties and ensuring its compliance with the law;
  - e. Ensure the conduct of Privacy Impact Assessments relative to activities, measures, projects, programs, or systems of the College;
  - f. Advise the College regarding complaints and/or the exercise by data subjects of their rights (e.g., requests for information, clarifications, rectification or deletion of personal data);
  - g. Ensure proper data breach and security incident management by the College, including the latter's preparation and submission to the NPC of reports and other documentation concerning security incidents of data breaches within the prescribed period;
  - h. Inform and cultivate awareness of privacy and data protection within the organization, including all relevant laws, rules, regulations, and issuances of the NPC;
  - i. Advocate for the development, review, and/or revision of policies, guidelines, projects, and/or programs of the College relating to privacy and data protection by adopting a privacy-by-design approach;
  - j. Serve as the contact person of the College vis-à-vis data subjects, the NPC, and other authorities in all matters concerning data privacy or security issues of concerns and the College;
  - k. Cooperate, coordinate, and seek advice from the NPC regarding matters concerning data privacy and security; and
  - l. Perform other duties and tasks that the College may assign that will further the interest of data privacy and security and uphold the rights of the data subjects.

### 6.1.3 Conduct of trainings or seminars

The College shall conduct mandatory data privacy and security training at least once per year. For Personnel directly involved in processing personal information, management shall ensure their attendance and participation in relevant training and orientations as often as necessary.

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#### 6.1.4 Privacy Impact Assessment (PIA)

The College shall conduct a Privacy Impact Assessment (PIA) at least once per year for all activities, projects, and systems involving the processing of personal data. The PIA shall encompass understanding the personal data flow, identifying and assessing potential threats and vulnerabilities, and proposing appropriate measures to mitigate privacy risks.

#### 6.1.5 Recording and documentation to ensure compliance with RA 10173, its IRR and other relevant policies.

The College shall record and document any activity, project, or endeavor pertaining to the personal information under its control to ensure compliance with the Data Privacy Act, its IRR, and the directives of the NPC. It shall use the data for its reports as required by law and likewise for evaluating its privacy measures to improve them.

#### 6.1.6 Review of Privacy Manual

This Manual shall be reviewed and evaluated annually. The College privacy and security policies and practices shall be updated to remain consistent with current data privacy best practices.

#### 6.1.7 Data Breach Response Team

The College will establish a Data Breach Response Team tasked with managing data breach incidents. Their duties will include assessing, containing, investigating, mitigating, and reporting data breaches in accordance with established protocols.

#### 6.1.8 Data Breach Protocol

The College shall have its data breach protocol, which shall likewise be reviewed annually, as initiated and proposed by the DPO.

#### 6.1.9 Retention and disposal procedure

The College will retain personal data only, when necessary, following the College's approved Records Disposition Schedule. It will dispose of all physical and electronic copies using secure technology. Permanent files must be protected with appropriate security measures.

### 6.2 Physical Security Measures

#### 6.2.1 Format of data to be collected

Personal data in the custody of the organization may be in digital/electronic format and paper-based/physical format.

#### 6.2.2 Storage type and location

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All paper-based personal information processed by the College shall be stored in secured filing cabinets, while the digital/electronic files are stored in the storage and processing system.

### **6.2.3 Monitoring and limitation of access to storage facility**

All authorized personnel must document their access to stored personal information in a manner that enables monitoring. This record should include the individual's name, date, time, duration, and purpose of access.

### **6.2.4 Design of office space/workstation**

The computers are positioned with considerable spaces between them to maintain privacy and protect the processing of personal data. Workstations must be off-limits to outsiders. Computer monitors near windows must not be accessible to the line of sight to outsiders.

## **6.3 Technical Security Measures**

### **6.3.1 Monitoring for security breaches**

The College shall use intrusion detection systems (IDS) and security information and event management (SIEM) tools to monitor security breaches and alert the organization of any attempt to interrupt or disturb the system.

### **6.3.2 Security features of the software/s and application/s used**

- This College shall first review and evaluate software applications before installing them on the organization's computers and devices to ensure the compatibility of security features with overall operations.
- Only secured or licensed software may be used by this College to prevent breaches caused by malware.
- Regular software updates and patches shall be applied to mitigate security vulnerabilities and enhance system protection.

### **6.3.3 Process for regularly testing, assessment and evaluation of effectiveness of security measures**

The College shall review security policies, conduct vulnerability assessments and perform penetration testing within the College on regular schedule to be prescribed by the appropriate department or unit. Incident response drills and security awareness training shall be conducted periodically to ensure preparedness against cyber threats.

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#### 6.3.4 Encryption, authentication process, and other technical security measures that control and limit access to personal data

- a. The College shall require the use of passwords to access personal information in its system, Multi-factor authentication (MFA) shall be implemented to strengthen user authentication and prevent unauthorized access.
- b. All sensitive data shall be encrypted both in transit and at rest using industry-standard encryption protocols to protect against data breaches.

### Chapter 7 BREACH AND SECURITY INCIDENTS

#### 7.1 Data Breach Response Team

All offices and employees of this College shall cooperate with the Data Breach Response Team (DBRT), which shall be responsible for ensuring immediate action in the event of a security incident or personal data breach. The team shall conduct an initial assessment of the incident or breach in order to ascertain the nature and extent thereof. It shall also execute measures to mitigate the adverse effects of the incident or breach.

##### 7.1.1 The DBRT shall be composed of the following:

- a. The DPO as ex-officio member
- b. The Compliance Officer for Privacy (COP) of the regular and extension campuses
- c. The Head of the Legal Services Unit
- d. Faculty from the Institute of Computing who specializes in Networking and Cybersecurity
- e. Personnel from the TSSU
- f. Personnel from the HRMO
- g. Personnel from the Records Office

#### 7.2 Procedure for recovery and restoration of personal data

The College, through TSSU, shall maintain a backup file for all personal data under its custody. In the event of a security incident or data breach, the backup must be compared with the affected file to determine the presence of any inconsistencies or alterations resulting from the incident or breach.

#### 7.3 Notification protocol

In case of a data breach, the head of each unit that has access to personal information or any other office with knowledge of such incident shall coordinate with the DPO and the DBRT, who shall, in turn, inform the College President of the need to notify the NPC and the affected data subjects within the period prescribed by law.

No notification may be made unless approved by the DPO.

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**7.4 Documentation and reporting procedure of security incidents or a personal data breach.**

In case of a data breach, the head of each unit that has access to personal information or any other office with knowledge of such incident shall assist the DBRT, which shall prepare detailed documentation of every incident or breach encountered and an annual report to be submitted to management and the NPC within the prescribed period.

**Chapter 8  
REQUESTS FOR RECTIFICATIONS AND COMPLAINTS**

Data subjects can ask for information, rectification, or clarification on any concern about how the College processes their personal information, including the security measures put in place to guarantee the safety of their data.

They might send a letter to the College, addressing the Data Protection Officer, outlining the inquiry briefly, and including their contact information for future use.

Requests, complaints, and inquiries must be sent to the DPO's official email at **dpo@dnsc.edu.ph** or in three (3) printed copies. The DPO will verify with the person making the request or the complainant that the inquiry complaint has been received.

**Chapter 9  
REPEALING CLAUSE**

If any provisions of this Manual conflict with any College issuance, memorandum, rule, regulation, or part of any of these, they are hereby repealed, changed, or amended as needed.

**Chapter 10  
EFFECTIVITY**

The provisions of this Manual are effective immediately after its approval by the Board of Trustees.

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ANNEXES

Annex A

Privacy Statement

Davao del Norte State College (DNSC) is committed to upholding the **right to privacy** and protecting personal data by **Republic Act No. 10173** or the **Data Privacy Act of 2012 (DPA)**, its Implementing Rules and Regulations (IRR), and the policies set by the **National Privacy Commission (NPC)**.

This **Privacy Statement** outlines DNSC’s general data collection and processing procedures. It serves as a foundation for all other privacy statements the College issues for specific offices, functions, or processes. In cases where more detailed information is required, a separate **Privacy Notice** or **Data Privacy Statement** will be provided for the relevant office, activity, or process.

For a comprehensive guide on the College’s privacy policies and procedures, please refer to the **DNSC Privacy Manual**.

1. Collection and Processing of Personal Data

DNSC collects and processes only the **necessary** and **relevant** personal data for its academic, administrative, and operational functions. Given the diverse nature of its stakeholders, the type and extent of personal data collected may vary depending on the **specific purpose** for which it is needed.

Types of Personal Data Collected

The College may collect the following categories of personal data:

- **Basic Information:** Name, nationality, date of birth, home address, phone number, email address
- **Academic Information:** Educational background, student records, grades, course enrollments
- **Employment Information:** Job position, work history, salary details, performance evaluations
- **Financial Information:** Tuition payments, financial aid records, scholarships, bank details
- **Government-issued Identifications:** SSS, PhilHealth, TIN, Passport, PRC, or other IDs
- **Security and Digital Information:** CCTV recordings, biometric data, IP addresses, cookies, system logs
- **Research-related Data:** Sensitive personal information, such as political views, health records, and ethnic background, as needed for approved research studies

All personal data is collected **with the express or implied consent** of the data subject unless otherwise permitted or required by law.

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2. Purpose of Data Collection and Processing

DNSC collects and processes personal data strictly for **legitimate purposes** that align with its mandate and legal obligations. These purposes include, but are not limited to:

- Verifying the identity of students, employees, and visitors
- Managing student admissions, enrollment, and academic records
- Administering faculty and staff employment records
- Generating statistical data for institutional planning and reporting
- Enhancing campus security through CCTV monitoring
- Conducting research and academic studies
- Complying with government regulations and reporting requirements
- Establishing, exercising, or defending legal claims

3. Data Sharing and Disclosure

DNSC upholds the **principles of transparency, proportionality, and legitimate purpose** when handling personal information. The College does **not** disclose or share personal data with third parties **without the prior consent of the data subject**, except in the following cases:

- **Compliance with Legal and Regulatory Obligations:** The College may disclose personal information to authorized government agencies such as **CHED, DepEd, TESDA, DBM, NEDA, DSWD, PRC**, and other regulatory bodies.
- **Academic and Institutional Partnerships:** DNSC may share personal data with partner institutions, research collaborators, or accrediting organizations when necessary and by a **Data Sharing Agreement (DSA)**.
- **Internal Data Sharing:** Any sharing of personal information between College units follows a standardized **Data Request Procedure** to ensure proper authorization and compliance with privacy policies.

4. Data Protection and Security Measures

To protect personal information, DNSC implements **strict security measures**, including:

- **Organizational Controls:** Designated **Data Protection Officer (DPO)** oversee compliance with data privacy regulations.
- **Physical Security Measures:** Restricted access to offices, secured storage areas, and surveillance monitoring.
- **Technological Safeguards:** Encryption, firewalls, anti-malware systems, and secured databases.
- **Administrative Controls:** Continuous staff training, confidentiality agreements, and periodic privacy audits.

Access to personal information is **strictly limited** to authorized personnel with a legitimate need to handle such data.

5. Data Retention and Disposal

DNSC retains personal data **only for as long as necessary** to fulfill its stated purpose or comply with applicable laws and regulations.

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When personal data is no longer needed, the College ensures its **secure disposal** through methods such as **shredding of physical records and permanent deletion from digital storage**.

6. Rights of Data Subjects

As mandated by the **Data Privacy Act of 2012**, individuals whose personal data is collected and processed by DNSC have the following rights:

- **Right to Be Informed**
- **Right to Access**
- **Right to Object**
- **Right to Rectification**
- **Right to Erasure**
- **Right to Data Portability**
- **Right to File a Complaint**

7. Contact Information

For inquiries, concerns, or requests regarding data privacy, you may contact the **DNSC Data Protection Officer (DPO)**:

**Email:** dpo@dnsc.edu.ph

**Office Address:** 2nd Floor, IC Building, Davao del Nort State College, New Visayas, Panabo City

This Privacy Statement may be updated periodically to reflect changes in data privacy policies and regulatory requirements.

Prepared by:

IAN JAY T. PADIOS  
Data Protection Officer

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Annex B

Data Privacy Consent

In accordance with **RA 10173** or the **Data Privacy Act of 2012**, I consent to the following terms and conditions on the collection, use, processing, and disclosure of my personal data. I am aware that the **Davao del Norte State College** has collected and stored my personal data upon accomplishment of this form. These data include my full name, contact details like addresses, and landline/mobile numbers. I express my consent for the Davao del Norte State College to collect, store my personal information. I hereby affirm my right to be informed, object to processing, access, and rectify and to suspend or withdraw my personal data pursuant to the provisions of the RA 10173 and its implementing rules and regulations. By affixing my signature, I warrant that I have read, understood all of the above provisions, and agreed with its full implementation.

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Annex C

Privacy Impact Assessment

Name of process/program/activity/initiative/system:

Office/Division/Unit:

I. SCREENING

A. NEW PROGRAM/PROJECT/INITIATIVE

A.1 Will the new program/project/initiative collect, store, share, use, or process Personal Data in any identifiable form?

- ☐ Yes
- ☐ No
- ☐ I don't know (Please schedule a consultation with the Data Protection Officer)

A.2 If the response to the question is YES (or changes are being/to be implemented to an existing program/project/initiative), accomplish the table below. If NO, proceed to Part IV.

Types of Personal Data to be Collected, Stored, Shared, Used, or Processed			
Personal Information	Y/ N	Sensitive Personal Information	Y/ N
1. Name		12. Age (with Birth Year)	
2. Home Address		13. Marital Status	
3. Business Address		14. Color, Race or Ethnic Origin (Including Citizenship or Place of Birth)	
4. Email Address		15. Religion (Religious beliefs or affiliations)	
5. Telephone Number - Work		16. Education	
6. Telephone Number - Home		17. Biometrics	

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7. Mobile Phone Number		18. Political Association	
8. Employment History		19. Philosophical Beliefs/Orientation	
9. Employment Compensation and Benefits		20. Health-related Information	
10. Closed-Circuit Television ("CCTV") Surveillance Videos		21. Sexual life/preference/practice	
11. Photos		22. Any records of Civil, Criminal, or Administrative Proceedings	
		23. Government-issued identifiers (licenses, passport, etc.) established by law as classified	

A.3 Will the new program/project/initiative cause changes to an existing process/system/program/project, and how will the Personal Data be processed?

☐ Yes, Describe Changes *(Note: Please use an additional sheet if necessary.)*

☐ NO

☐ I don't know (Please schedule a consultation with the Data Protection Officer)

B. EXISTING PROGRAM/PROJECT/INITIATIVE

B.1 Has a Privacy Impact Assessment been performed for this existing program/project/initiative?

☐ Yes

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☐ No

☐ I don't know (Please schedule a consultation with the Data Protection Officer)

B.2 Will the process owner use the Personal Data for a new purpose other than for the purpose they are currently being used?

☐ Yes

☐ No

☐ I don't know (Please schedule a consultation with the Data Protection Officer)

B.2 Is there an existing Data Sharing Agreement and/or Data Processing Agreement with the other organizations given access to and/or allowed to process the Personal Data?

☐ Yes (Please identify: \_\_\_\_\_)

☐ No

☐ Not Applicable (Please state reason: \_\_\_\_\_)

B.3 Will the Personal Data about individuals be disclosed to organizations or people who have not previously been given access to the information?

☐ Yes

☐ No

☐ I don't know (Please schedule a consultation with the Data Protection Officer)

II. PROCESSING AND DATA LIFE CYCLE DETAILS

A. Source of Personal Data: From whom are we collecting the Personal Data?

☐ Directly from the data subjects (i.e., natural persons who own the Personal Data)

☐ Another individual (Relationship with the data subject: \_\_\_\_\_) ☐ Another entity (i.e., a corporation/organization which is a personal information controller)

☐ Another Business Unit

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**A.1 Method of Collection:** How are we collecting/obtaining the Personal Data (e.g., via interviews, online portal, email)? Provide a brief description

**B. Capacity by which Personal Data is Processed:** Are we processing the Personal Data for the College’s independent purposes or on behalf of an external/third party, including subsidiaries and/or affiliates?

- ☐ For the College’s independent purposes (as Personal Information Controller [PIC])
- ☐ On behalf of an external/third party (as Personal Information Processor [PIP])
- ☐ Both as PIC and PIP

**C. Purpose/s of Processing Personal Data:**  
(Note: If your answer to Question 3 above is “Both as PIC and PIP”, please identify which purposes pertain to external/third parties.)

(Note: Please use an additional sheet, if necessary.)

**D. Are data subjects made or will they be made aware of the above mentioned purposes?**

- ☐ Yes Describe How:
- ☐ No
- ☐ Not Applicable

E.g., Through Privacy Notice/Consent

**E. Basis for Collecting/Processing Personal Data:**

**E.1 [If based on Consent] Method of Obtaining Consent:**  
How are we obtaining the consent for the collection and processing, including whether the consent is or will be obtained through an external/third party or another Division/Unit of DNSC? Describe briefly.





**E.2 If there are multiple items** being offered to the data subjects, will/do they have the option to accept one and decline the others without being entirely denied of coverage?

- ☐ Yes
- ☐ No
- ☐ Not Applicable

**E.3 [If based on other lawful grounds]:**  
Identify the basis for lawful processing of Personal Data specifically relied upon. Check as many as applicable.

- ☐To fulfill a contract with the data subject or necessary prior to entering a contract
- ☐To comply with the legal obligations of DNSC (Please describe: \_\_\_\_\_)
- ☐To protect vitally important interests of the data subject, including life and health
- ☐To provide medical treatment carried out by a medical practitioner or institution
- ☐To respond to national emergency, requirements of public order/safety, or a public authority
- ☐To pursue other legitimate interests of DNSC
- ☐To protect lawful rights, including the establishment, exercise or defense of legal claims
- ☐Others: \_\_\_\_\_
- ☐I don't know (Please schedule a consultation with the Data Protection Officer.)

**E.4 Method of Storing the Personal Data:**

Describe briefly how the Personal Data will be stored, including where, media used (physical and electronic files) and if outsourced and possible secondary repositories, e.g., laptops, desktops, personal cabinets, etc.



E.5 Is the Personal Data transferred outside of the Philippines?  
Describe briefly.

E.6 Personnel Involved /Internal Disclosures: Identify other Units/Departments to which the Personal Data are/will be disclosed and/or part of the processing activity (even those involved for storage purposes only) .

Unit/Department	Purpose of Access/Involvement

E.7 External Disclosures:

(a)Identify external parties to which the Personal Data are/will be disclosed and/or part of the processing activity.

External Party	Mode/Method of Disclosure/Transfer <sup>8</sup>

(b) Are those external parties covered by any contract or instrument describing their obligations in protecting such data?

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- ☐ Yes
- ☐ No
- ☐ Not Applicable

E.8 Data Life Cycle: Briefly describe the following:

Time of Collection	
Retention Period	
Disposal/Destruction/Deletion/Method/ Procedure	

E.9 Automated Decision-making: Does the program/project/initiative adopt automated processing operations (applicable even where the collection is done manually)?

- ☐ Yes
- ☐ No
- ☐ I don't know (Please schedule a consultation with the Data Privacy Office).

III. IMPACT ASSESSMENT – IDENTIFIED RISKS AND AGREED PLAN OF ACTION

Issue	Risk	Likelihood	Severity	Risk Factor	Action Plan (Y/N)	Action Plan	Timeline

Other Recommendations



IV. SIGN-OFF

We/I hereby acknowledge the truthfulness, accuracy, and completeness of the foregoing responses, and **we/I undertake to immediately notify the Data Privacy Office of any change or modification thereto that would have an impact on the processing of Personal Data.**

NAME	NAME
Designation:	Designation:
Date Signed:	Date Signed:

RECEIVED:

Data Protection Officer  
Date Signed:

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