



Republic of the Philippines  
NATIONAL PRIVACY COMMISSION

**PRIVACY POLICY OFFICE  
ADVISORY OPINION NO. 2017-36**

27 July 2017



**Re: WORK-RELATED PERSONAL DATA**

Dear 

This is with regard to your query received by the National Privacy Commission (NPC) on 6 February 2017. You inquired on whether work-related personal data is within the scope of Republic No. 10173, otherwise known as Data Privacy Act of 2012 (DPA).

Likewise, you asked how the DPA will apply to a situation where a single proprietor (vendor/supplier) used his or her home address and personal mobile number as work address and work contact number respectively.

The DPA defines personal information as “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.”<sup>1</sup>

Work-related personal data, such as work email address and employee number, may be considered as personal information since it is information from which the identity of an individual can be reasonably and directly ascertained and when put together with other information, would identify an individual.

Note however that the DPA provides for special cases which is beyond the scope of the law, such as information about any individual who is or was an officer or employee of a government institution that relates to the position or functions of the individual, including his or her business address and office telephone number.<sup>2</sup>

On the use of personal contact number and home address as work contact details, the provisions of the DPA, its Implementing Rules and Regulations (IRR) and related issuances

---

<sup>1</sup> RA No. 10173, §3(g)

<sup>2</sup> Id., §4(a)

of the NPC would still be applicable to the processing of the same since these are still considered as personal information taking into account the above-mentioned definition.

For your reference.

Sincerely,

**RAYMUND ENRIQUEZ LIBORO**  
Privacy Commissioner and Chairman