“NPC Circular 16-01 :
SECURITY OF PERSONAL DATA IN
GOVERNMENT AGENCIES”

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DATA PRIVACY
ACCOUNTABILITY
AND
COMPLIANCE
FRAMEWORK

I. GOVERNANCE
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B. Register
C. Records of processing activities
D. Conduct PIA

II. RISK ASSESSMENT

III. ORGANIZATION
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F. Privacy Manual

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H. Q. Data Subject Rights
P. Data Life Cycle

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S. Technical
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○ Access Control Policy

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□ Data Breach Response Team
□ Incident Response Procedure
□ Document
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IX. CONTINUITY
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Y. New technologies and standards
Z. New legal requirements

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Government DPO Conference 2018
Government Requirements based on NPC Circular 16-01

Section 4:

- **Appointment Papers of a Data Protection Officer:**
  - A designated individual(s) who is accountable for the organization’s compliance with the DPA

- **Privacy and data protection policies:**
  - Create privacy and data protection policies
Section 5:

Privacy Impact Assessments:
- Conduct a privacy impact assessment for each program or process to determine the privacy risks and legal gaps.

Section 6:

- **Control Framework for RISKS and LEGAL GAPS:**
  Address the risks and legal gaps identified in the privacy impact assessments by creating a control framework with proper organizational, physical and technical security measures.
Cont. of Section 6:

- ISO/IEC 27002 (recommended):
  For large-scale agencies (more than 1,000 employees), it is recommended to implement the use of ISO/IEC 27002 – Code of practice for information security controls

Section 7:

Data Center:
Personal data being processed by a government agency shall be stored in a data center with the appropriate control framework for data protection
Encryption of personal data at rest and in transit (AES-256): Personal data that are processed digitally, at rest and in transit, must be encrypted using Advanced Encryption Standard with a key size of 256 bits as minimum standard.

Password policy: Enforcement of a strong and sufficient password policy to deter passwords attacks.
Section 9:

Access Control Policy:
Access to all applications, processing systems and facilities owned and controlled by an agency shall be restricted to its personnel that have the appropriate security clearance.

Section 10:

Outsourcing Contracts:
When dealing with personal information processors, ensure that proper organizational, physical and technical security measures are in place to ensure the confidentiality, integrity and availability of personal data.
Section 11:

Audits:
To further ensure personal data protection, NPC reserves the right to conduct an audit. An independent verification/certification by a reputable third party may also be accepted.

Section 12:

ISO/IEC 27018 certification (recommended):
An ISO/IEC 27018 certification is recommended for the service or function provided by a service provider.
Section 13:

Archives:
Apply organizational, physical and technical security measures to protect archived personal data

Section 14-15:

Access Control and Security Clearance for Database Modification or Personal Data Access:
Strictly regulate access to personal data by having a security clearance policy for personal data that are in the agency’s custody
Section 16:
Access Control Policy on Outsourced Providers
Contractors, consultants and service providers that have access to personal data shall be governed by strict procedures stated in their contracts.

Section 17-18:
Acceptable Use Policy
Have an up-to-date acceptable use policy regarding the use of ICT resources.
Secure Encrypted link and Multi-Factor Authentication for Online Access

Agency personnel who access personal data online should authenticate their identity through a secure encrypted link and use multi-factor authentication.

Section 19:

Automatic Deletion

Provide for the automatic deletion of temporary files that may be stored on a local machine.
Cont. of Section 19:

**Network Drive**

Personnel shall only be permitted to save personal data to an allocated network drive whenever applicable.

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**Drives and USB ports (disabling policy)**

Establish policies to prevent unlawful personal data distribution through portable media.
Section 20:

**Authorized Devices Policy**
Ensure that only authorized devices are being used.

Section 21:

**Remote Wipe/Deletion Policy**
Adopt and use technologies that allow the remote disconnection of a mobile device owned by the agency or the deletion of personal data in it.
Section 22:

Paper-based Filing System
Maintain a log for personal data that are stored in paper files or any physical media.

Section 24:

Email Encryption
If personal data are transferred by email, data must be encrypted.
Section 25:

Policies on printing personal data
Controls must be in place to prevent personnel from printing or copying personal data to personal productivity software like word processors and spreadsheets.

Section 26:

Full Disk Drive Encryption
Ensure that the agency utilizes full disk encryption whenever portable media are used for personal data processing.
Section 27:

One-time PIN for CD or DVD usage or distribution

If the use of compact discs in personal data transfer is unavoidable, an authentication technology such as one-time PIN (OTP) must be in place.

Section 28:

Fax Machines

Facsimile technology shall not be used for transmitting documents containing personal data.
Section 29: Post Mail usage policy
Organizational, physical and technical measures should be adopted in transmitting documents or media containing personal data by mail or post.

Section 31: Disposal Policy
Procedures must be established regarding secure disposal of personal data stored onsite (files and computer equipment) and offsite.

Section 33: Data Breach Management
Establish data breach management procedures
For more information, please visit:

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