

Appendix 1.

Re: Initial determination of the National Privacy Commission on sectors or institutions requiring Registration of Data Processing Systems under Sections 5(C) and 5(D) of NPC Circular 17-01 on the “Registration of Data Processing Systems and Notifications regarding automated decision-making.”

The sectors or institutions provided herein that are processing personal data and operating in the country are subject to mandatory registration as provided in Sections 5(C) and 5(D) of NPC Circular 17-01. **ALL OTHER PICS OR PIPS SHOULD REGISTER IF IT EMPLOYS AT LEAST 250 PERSONS OR PROCESSING AT LEAST 1,000 RECORDS INVOLVING SENSITIVE PERSONAL INFORMATION.**

The National Privacy Commission determines, for the limited purpose of mandatory registration under NPC Circular 17-01, that the following sectors or institutions are considered PICs or PIPs involved in the processing of personal data that is likely to pose a risk to the rights and freedoms of data subjects and/or where the processing is not occasional:

1. GOVERNMENT BRANCHES, BODIES OR ENTITIES, INCLUDING NATIONAL GOVERNMENT AGENCIES, BUREAUS OR OFFICES, CONSTITUTIONAL COMMISSIONS, LOCAL GOVERNMENT UNITS, GOVERNMENT-OWNED AND -CONTROLLED CORPORATIONS
2. BANKS AND NON-BANK FINANCIAL INSTITUTIONS, INCLUDING PAWNSHOPS NON-STOCK SAVINGS AND LOAN ASSOCIATIONS (NSSLAS)
3. TELECOMMUNICATIONS NETWORKS, INTERNET SERVICE PROVIDERS AND OTHER ENTITIES OR ORGANIZATIONS PROVIDING SIMILAR SERVICES
4. BUSINESS PROCESS OUTSOURCING COMPANIES
5. UNIVERSITIES, COLLEGES AND OTHER INSTITUTIONS OF HIGHER LEARNING, ALL OTHER SCHOOLS AND TRAINING INSTITUTIONS
6. HOSPITALS INCLUDING PRIMARY CARE FACILITIES, MULTI-SPECIALTY CLINICS, CUSTODIAL CARE FACILITIES, DIAGNOSTIC OR THERAPEUTIC FACILITIES, SPECIALIZED OUT PATIENT FACILITIES, AND OTHER ORGANIZATIONS PROCESSING GENETIC DATA

7. PROVIDERS OF INSURANCE UNDERTAKINGS, INCLUDING LIFE AND NON-LIFE COMPANIES, PRE-NEED COMPANIES AND INSURANCE BROKERS
8. BUSINESS INVOLVED MAINLY IN DIRECT MARKETING, NETWORKING, AND COMPANIES PROVIDING REWARD CARDS AND LOYALTY PROGRAMS
9. PHARMACEUTICAL COMPANIES ENGAGED IN RESEARCH
10. PERSONAL INFORMATION PROCESSORS PROCESSING PERSONAL DATA FOR A PERSONAL INFORMATION CONTROLLER INCLUDED IN THE PRECEDING ITEMS, AND DATA PROCESSING SYSTEMS INVOLVING AUTOMATED DECISION-MAKING