

ROPERTY OF THE NATIONAL PRIVACY





ORIV ACY COMMISSI **Technical** JE NA

Organisational – other measures





Technical

Encryption

To what standard? (cost Vs benefit)

All devices or just some?

Passwords

Enforced strength and updates?

Sharing data

Technical solutions – e.g. via email; portals

System testing & maintenance

Who has access, to what (System Administrators)

Live or dummy data?

Firewalls / Anti-virus / Spam filters

Backups

Secure: encrypted tapes | cloud-provider

Auditable process

Access control

Who decides permissions and privileges ('need to know')?

Remote access

How delivered securely?

Permit Bring Your Own Device?





Secure Office Storage

Remote working

For removable devices and hardcopy information

Secure both hardcopies and devices when in transit.

Identifying marks?

Locked print?

Kensington locks?

Offsite?

Kept out of sight: in transit | at home.

Lockable pedestals | Kensington locks?

Building access control

Secure premises – CCTV | locked windows | perimeter

Locked CCTV room | server room

ID badges, supervised visitors | contractors

Secure disposal

Shredding of hardcopies

Beyond use | Reuse | Resale





Organisational – other measures

Policy, procedures, guidance & training

Eliminate ambiguities

Clearly communicated, readily accessible and understood

Human Resources Procurement (and contracts)

Explicit roles and responsibilities in Job Descriptions and Terms of Reference

i.e. outsourced services like IT and software

Terms and Conditions: confidentiality clauses

Due diligence Auditing and monitoring

Clear expectations | reporting lines

Disciplinary process

Training records

Compliant contract Terms and Conditions:

- Act on your instructions
- Equivalent security





CESSING SYSTEMS PRIVATIONAL P REGISTRATION OF DATAOMMISST PROCESSING CYCTT





Timeline of DPA Law and IRRs passed to Organization's Compliance

2012

March 2016

August 2016

Sept. 9, 2016 Sept. 9, **2017**

Comply with

registration

requirements

Data
Privacy Act
(DPA)
Passed into

National Privacy Commission (NPC) was formed

Implementing rules and Regulations (IRRs) was published

Registration Requirements: All personal data processing systems (DPS) operating in the Philippines that (1) employs at least 250 employee; OR (2) processes at least 1,000 sensitive personal information; OR (3) data processing is likely to pose a risk to the rights and freedoms of data subjects; or (4) service providers to government must be registered with NPC

IRRs came into
effect
(compy with
all provisions
except
registration
requirements)

12 months





Register with the NPC (Legal Basis: Sec. 24, IRR 33 and 46-49)

COMPLIANT

NON-COMPLIANT

Register with the NPC	Non-registration with the NPC
☐ Registration with the NPC is up-to-date and contains all necessary compliance documentation	No registration (must be renewed annually) Out-of-date registration (must be updated within three months of
☐ Registration of all automated processing operations that have legal	any change) Non-reporting to NPC of documented security incidents and
 Annual report summarizing documented security incidents and personal data breaches 	personal data breaches
☐ Service providers are also registered	
ROPER	
	 □ Registration with the NPC is up-to-date and contains all necessary compliance documentation □ Registration of all automated processing operations that have legal effect on the data subject □ Annual report summarizing documented security incidents and personal data breaches





Who should register?

Personal Information Controllers and Personal Information Processors who:

employ more than 250 persons

process sensitive personal information of at least 1,000 individuals

belong to sectors identified by the NPC where:

the processing carried out is likely to pose a risk to the rights and freedoms of data subjects, and the processing is not occasional

are service providers to government.





OMMISS

Section 47. Registration of Personal Data Processing Systems.

The personal information controller or personal information processor that employs fewer than two hundred fifty (250) persons shall not be required to register unless the processing it carries out is likely to pose a risk to the rights and freedoms of data subjects, the processing is not occasional, or the processing includes sensitive personal information of at least one thousand (1,000) individuals. ROPERTY OF THE





Cont...Registration

- a. The contents of registration shall include:
- 1. The name and address of the personal information controller or personal information processor, and of its representative, if any, including their contact details;

OMMISS

- 2. The purpose or purposes of the processing, and whether processing is being done under an outsourcing or subcontracting agreement;
- 3. A description of the category or categories of data subjects, and of the data or categories of data relating to them;
- 4. The recipients or categories of recipients to whom the data might be disclosed;
 - 5. Proposed transfers of personal data outside the Philippines:

Cont...Registration

6. A general description of privacy and security measures for data protection;

OMMISS

- 7. Brief description of the data processing system;
- 8. Copy of all policies relating to data governance, data privacy, and information security;
- 9. Attestation to all certifications attained that are related to information and communications processing; and
- 10. Name and contact details of the compliance or data protection officer, which shall immediately be updated in case of changes.
- b. The procedure for registration shall be in accordance with these Rules and other issuances of the Commission.

Of Registration OMMIS. Phase TWO Phase TWO PRIVACY OF THE NATIONAL PRIVACY







Republic of the Philippines

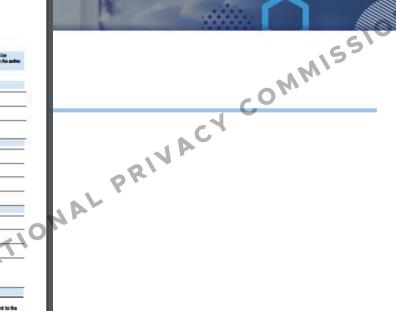


National Privacy Commission REGISTRATION OF DATA PROCESSING SYSTEM

DATA PROTECTION OFFICER - DPG

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Republic of the Philippines

National Privacy Commission

REGISTRATION OF DATA PROCESSING SYSTEM

DATA PROTECTION OFFICER - DPO

COMMISSION Note: The personal information submitted human shall be used for the initial phase of the Data Processing System Online Registration and supporting documents should be affected along with this form. Once this form has been unlisted by the NPC, you will be given an access code also ented and SMS to combus with your regionalize with the collec-

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PERSONAL INFORMATION CONTROLLER	PRI	
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OFFICIAL DESIGNATION (CEOPPRESCENT)		
DATA PROTECTION OFFICER		
LAST NAME	EMAL	
FIRST NAME	TEL NO.	
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OFFICIAL DESIGNATION	STATUS (PERMANENT: YM7)	

Phase 2 - Registration OMMISS

Name of Data Processing System
Purpose of Processing Processing as PIP, PIC or both **Outsourced or Sub Contracted** Description of the Category Recipients or Categories of Recipients to whom the personal data might be disclosed Personal data is transferred outside of the Philippines?









