

Republic of the Philippines NATIONAL PRIVACY COMMISSION

REMINDER TO PERSONAL INFORMATION CONTROLLERS REGARDING THE USE OF THE CC FEATURE IN EMAIL COMMUNICATIONS

The National Privacy Commission (NPC) highlights the risks associated with the misuse of the carbon copy "cc" function in email communications.

We have observed the high number of human errors, specifically the inadvertent use of the cc function, as a cause of security incidents, which have risen in number since 2021. Such errors have led to unintended data exposure, potentially compromising the privacy and security of the data subjects involved.

Here are some of the risks with the use of the "cc" function:

- The "cc" function displays the email addresses of all recipients to every recipient. This may result in unintentional disclosure of personal information, which may lead to spam, phishing attempts, or targeted attacks.
- Inappropriately using "cc" may give unauthorized persons access to personal and sensitive
 personal information, confidential information, and restricted information that may be
 contained in the email body or its attachments, resulting in a breach of confidentiality, data
 sharing, and other applicable non-disclosure agreements.
- Mishandling personal information by using the "cc" function, under certain circumstances, may be unnecessary or not proportional for the purpose which can be regarded as a violation of the general data privacy principles in the DPA.

In the alternative, the Commission encourages to check if the blind carbon copy "bcc" function is a more appropriate mode of delivery of emails. To note, the "bcc" function conceals the recipient email addresses from each other, providing an added layer of protection that reduces the risk of accidental data exposure.

Here are some of the best practices that the NPC recommends when using email communications:

- Double-check the recipients of the email and verify whether the emails included in the "cc" function are necessary.
- Use "bcc" appropriately as when making announcements or mass emails to ensure that the intended recipients are hidden from each other.
- Be mindful of the personal and sensitive personal information shared in your emails and its attachments. It is desirable to apply other safeguards such as encryption, password protection, and secure file-sharing platforms in certain instances.
- Train and coach all your employees to practice the best practices in email correspondence.

Finally, the Commission reminds the Government and the Private Sectors that the failure to implement sufficient data protection measures can be punishable under the DPA and pertinent NPC issuances.

For more information, guidance, and resources on data privacy, please visit our website at www.privacy.gov.ph.

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