

### RULE #3



Write Your Plan:  
Create your **Privacy  
Management Program** (PMP).

Your **Privacy Management Program** serves to align everyone in the organization in the same direction, to facilitate compliance with the Data Privacy Act and issuances of the NPC, and to help your organization in mitigating the impact of a data breach.

**Section 25.** Data Privacy and Security. The personal information shall put in place *organizational, physical and technical* security measures for data protection, including policies for evaluation, monitoring and review of operations and security risks. The same obligation shall be required from personal information processors engaged by the personal information controller to process personal data on its behalf.

# Let's have a Recap!

T -

L -

P -

# Principles

“**Transparency**” – no surprises in how the data collected is being processed

“**Legitimate purpose**” – required by law and not contrary to public morals

“**Proportionality**” – collect only what’s needed and commensurate to the benefits

“**Confidentiality**”

“**Integrity**”

“**Availability**”

# PRIVACY NOTICE & INFORMATION



## You must give notice that:

- Provides details of the grounds that are used to justify processing
- Highlights that consent may be withdrawn, the existence of the data subject rights and the right to lodge a complaint with the Supervisory Authority, and
- Is concise, transparent, intelligible and in an easily accessible form using clear and plain language.

# Drafting a Privacy Notice

## Key Sections



# I. INTRODUCTION

- ▶ Privacy notice is an external-facing statement that specifies a company's practices regarding the collection, use and sharing of customer or consumer data.
- ▶ This page is a statement of policies regarding the collection, use, storage, disclosure and disposal of personal data received and collected from the users of the site.



## II. COLLECTION AND USE OF PERSONAL DATA

### Types of Personal Data

- ▶ Examples: Name, Address, SSS Number, PhilHealth Number, Pagibig Number, Bank Account Number, etc.

### Means and Methods

- ▶ Examples: Registration with the website, Purchase or transaction with the website, etc.





## Laws, Rules or Regulations

- ▶ Examples: Data Privacy Act of 2012, Implementing Rules and Regulations of the DPA, etc.

## Reason for Requiring Information

- ▶ Examples: provide, protect and improve services of the agency or office, etc.



### III. DATA SHARING

- ▶ Name of Agency
- ▶ Purpose of Data Sharing



## IV. INFORMATION CONTROL AND LIMITATION

- ▶ Request for a copy of the privacy policy and make corrections or revisions, if necessary.



## **V. PERSONAL DATA SECURITY**

- ▶ Ensure safety and security of personal information.



## VI. LOG DATA

- ▶ Information that the browser sends whenever a site is visited.



## VII. USE OF COOKIES

- ▶ A cookie is a small file which asks permission to be placed on the computer's hard drive.
- ▶ Once agreed, the file is added and the cookie helps analyse web traffic or lets one know when a particular site is visited.



## VIII. LINKS TO OTHER WEBSITES

- ▶ A site may contain links to other websites of interest.



## IX. PERSONAL DATA RETENTION AND DISPOSAL

- ▶ Personal data is kept only for as long as necessary.





## X. CHANGES TO THIS PRIVACY POLICY

- ▶ Right to update or change the privacy policy at any time, and the same must be checked periodically.

## **The contact details that should be included are**

- ❖ Name
- ❖ title and designation
- ❖ Division or Department
- ❖ Contact details (number and email)

Now it's *your* turn!

**Mother Tongue: Bikol**

“Data protection and privacy must not be a mystery, especially to employees at the operational forefront of organisations.

Operationally they must not be something that only lawyers can understand. They must be **owned** by all employees of organisations.”

-88 Privacy Breaches to Beware of



**NATIONAL  
PRIVACY  
COMMISSION**

**End of Module 4.  
Any questions?**