



UNIVERSITY OF SANTO TOMAS  
OFFICE OF THE SECRETARY-GENERAL

UST:S006-00-ME07  
AY 2018-2019

**TO:** PERSONAL INFORMATION CONTROLLERS OF DATA  
PROCESSING SYSTEMS

**FROM:** THE OFFICE OF THE SECRETARY-GENERAL

**SUBJECT:** REQUISITES FOR THE SECOND PHASE OF DPO  
REGISTRATION AND FINALIZATION OF OPERATIONAL  
GUIDELINES

**DATE:** 22 JANUARY 2019

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As discussed during the public consultation on UST's Policies on Privacy and Disclosure of Personal Information on Thursday, 17 January 2019, please submit pertinent information relative to the following questions from the National Privacy Commission's registration process, concerning the Data Processing System you currently manage:

<b>Name of Data Processing System (DPS)</b>	
<b>Purpose and Description</b>	
<b>Managed as</b>	<input type="checkbox"/> PIC <input type="checkbox"/> PIP <input type="checkbox"/> both
<b>Type of DPS</b>	<input type="checkbox"/> manual/paper-based <input type="checkbox"/> electronic <input type="checkbox"/> both
<b>Is the system subcontracted / outsourced?</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Will personal information be transferred outside of the Philippines?</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No

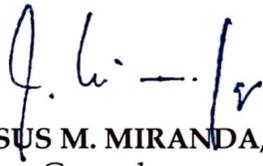
We appreciate receiving the soft copies of your responses to the aforementioned questions on or before Tuesday, 29 January 2019, via [secgen@ust.edu.ph](mailto:secgen@ust.edu.ph).

Concerning Data Processing Systems that are managed by a group of administrators (i.e. Dean's Menu), a common information must be prepared as agreed upon by the concerned group.

Further, as discussed, the operational guidelines pertaining to the Data Processing Systems may already be prepared and aligned with the subsections of *Section 5 Processing of Personal Data* of the UST's Policies on Privacy and Disclosure of Personal Information, namely, a) collection of Personal Data, b) their actual use, c) storage, retention and destruction, d) access, and e) disclosure and sharing of Personal Data.

**In the process of finalizing your operational guidelines, let us be proactive by referring to the attached Guide Questions derived from the Personal Data Flows of the Privacy Impact Assessment (PIA) of the National Privacy Commission (NPC). As Personal Controllers of the Data Processing Systems of your respective Units/Offices, you are responsible to conduct assessment on possible risks on existing personal data, in preparation for the future visit of NPC to the University.**

Thank you.

A handwritten signature in black ink, appearing to read 'F. L. - Jr.' with a stylized flourish at the end.

**FR. JESUS M. MIRANDA, JR., O.P.**  
Secretary-General

Examples of Personal Data include *full name, address, gender, phone number, etc.* while examples of Sensitive Personal Information include *race, ethnicity, marital status, health, genetic, government issued numbers, etc.* These Personal Information follow a data life cycle, from collection to disposal.

In the process of preparing the specific guidelines on data processing inherent to the Personal Information gathered in your respective Offices / Units, please consider the following **GUIDE QUESTIONS** in each stage of the data life cycles of the applicable data subjects:

DATA FLOW		<i>Guide Questions per stage of the data life cycle</i>				OPERATIONAL GUIDELINES FOR YOUR RESPECTIVE UNITS
1	<b>COLLECTION</b>	<p>1.1 <i>State who collected or will be collecting the personal information and/or sensitive information.</i></p>	<p>1.2 <i>How is the personal information/sensitive personal information collected and from whom it was collected?</i></p> <p>Note: » <i>This holds true if personal information is collected from some source other than the individual</i></p>	<p>1.3 <i>What is(are) the purpose(s) of collecting the personal data?</i></p> <p>Note: » <i>Be clear about the purpose of collecting the information</i> » <i>Are you collecting what you only need?</i></p>	<p>1.4 <i>How was or will the consent be obtained?</i></p> <p>Note: » <i>Do individuals have the opportunity and/or right to decline to provide data?</i> » <i>What happens if they decline?</i></p>	
2	<b>STORAGE</b>	<p>2.1 <i>Where is it currently being stored?</i></p> <p>» <i>Is it being stored in a physical</i></p>	<p>2.2 <i>Is it being stored in other country?</i></p> <p>» <i>If it is subject to a cross-border transfer,</i></p>	<p>2.3. <i>Is the storage of data being outsourced?</i></p> <p>» <i>Specify if the storing process is being done in-</i></p>		

		<i>server or in the cloud?</i>	<i>specify what country or countries.</i>	<i>house or is it handled by a service provider</i>		
<b>3</b>	<b>USAGE</b>	<p>3.1.  <i>How will the data be used or what is the purpose of its processing?</i></p> <p>» <i>Describe how the collected information is being used or will be used</i></p> <p>» <i>Specify the processing activities where the personal information is being used.</i></p>				
<b>4</b>	<b>RETENTION</b>	<p>4.1  <i>1. How long are the data being retained? And Why?</i></p> <p>» <i>State the length of period the data are being retained?</i></p> <p>» <i>What is the basis of retaining the data that long?</i></p>	<p>4.2  <i>Are the data retained by the organization or are they being outsourced?</i></p> <p>» <i>Specify if the data retention process is being done in-house or if it is handled by a service provider</i></p>			

		<i>Specify the reason(s)</i>				
5	<b>DISCLOSURE /SHARING</b>	<p>5.1 <i>To whom it is being disclosed to?</i></p>	<p>5.2 <i>Is it being disclosed outside the organization? Why is it being disclosed?</i>  <i>» Specify if the personal information is being shared outside the organization</i>  <i>» What are the reasons for disclosing the personal information</i></p>			
6	<b>DISPOSAL / DESTRUCTION</b>	<p>6.1 <i>How will the data be disposed?</i>  <i>» Describe the process of disposing the personal information</i></p>	<p>6.2. <i>Who will facilitate the destruction of the data?</i>  <i>» State if the process is being managed in-house or if it is managed by a third party</i></p>			