



# St. Clare College

# **DATA PRIVACY MANUAL**

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# St. Clare College

The School Of Life Skills

## PHILOSOPHY

St. Clare College is a student-centered school which focuses on the student and his need to grow and fully develop his intellectual, physical, social, spiritual and emotional faculties.

## MISSION

To provide quality and excellent global education for the total development of a responsible, innovative, skillful and professional global workforce whose values and dignity are beyond par.

## VISION

To become the leading institution for professional development and the first and foremost provider of quality, affordable and sustainable development education.





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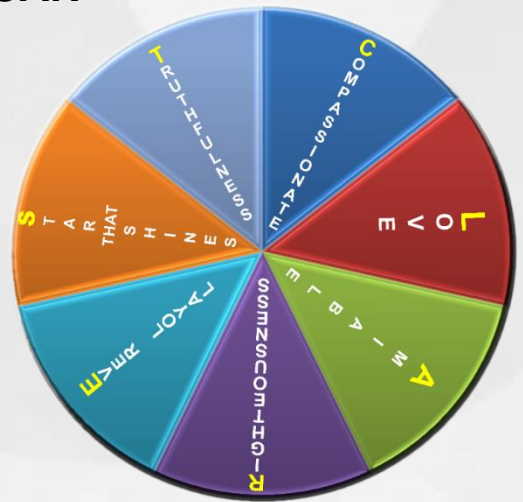
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## CORE VALUES

### ST. CLARE COLLEGE OF CALOOCAN

(Hereinafter referred to as the “School” or “College”) aims to foster distinction and excellence in all the endeavors of the school community members. All stakeholders are envisioned to be

imbued with enduring core values which define and shape the central beliefs and character of every genuine Clarean student, employee and administrator within and beyond the premises of the academic institution. community.





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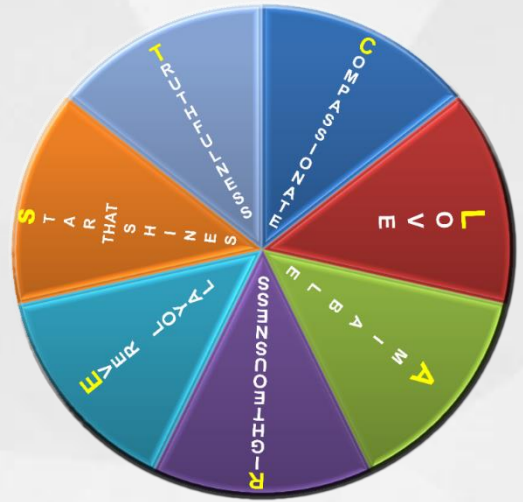
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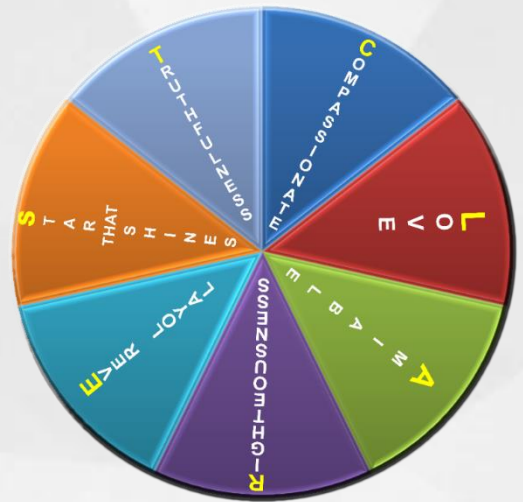
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### CORE VALUES

Hereafter are the core values of St. Clare College:

#### Star that Shines

All members of the school community are encouraged to exemplify remarkable standards in attaining excellence in every aspect of life, making them role models who possess the values and character that are worth emulating.



#### Truthfulness

Truthfulness is characterized by embracing honesty in thoughts, words and deeds of all concerned students/individuals who are part of the school community.

#### Compassion

Selflessness and genuine concern for others are instilled in Clareans through constant exposure to various academic, extracurricular and co-curricular activities that will bring out their compassionate attribute.





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### CORE VALUES

#### Love

Love for oneself, for others and for noble causes are pivotal in cultivating a well-rounded students/individual who embodies unwavering desire and sustained commitment in undertaking

#### Amiable

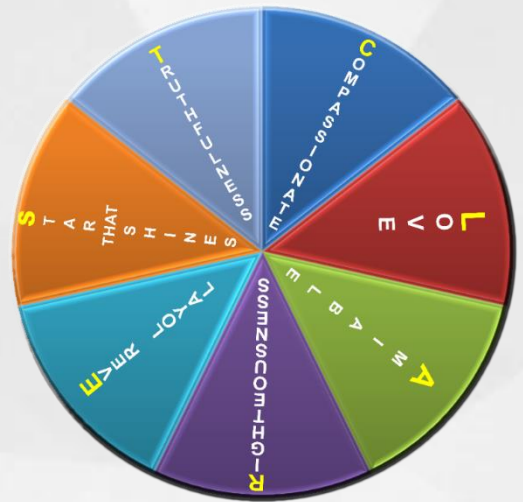
Displaying a friendly disposition and pleasant attitude towards other people inspires positive rapport and desirable outcomes.

#### Righteousness

All concerned members are expected to uphold the ideals and moral principles of the institution as a reflection of their integrity and dignity.

#### Ever Loyal

Remaining steadfast to the ideals and good name of the school is a desirable impression ingrained in the minds and hearts of all the members of the school community.





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## ST. CLARE COLLEGE K-12 CURRICULUM GRADUATE ATTRIBUTES

### **Intellectual Creativity, Critical Thinking and Innovativeness**

Students can use their imagination as well as their rational thinking abilities and innovation, in order to adopt and adjust to the changing needs of the times both nationally and globally.

### **Effective Communication**

Students are proficient and skillful in the four areas of communication: reading, writing, listening and speaking. They can use their skills in solving problems and articulating their thoughts when engaging with people in various situations.

### **Leadership Effectiveness and Managerial Skills**

Students are developed to become the best in their respective specializations and industry by imploring leadership competencies, managerial skills and technical know-how.

### **Sense of Nationalism and Global Responsiveness**

Students are nationalists and respect the values of global citizenship.

### **Personal and Professional Ethical Standard of Excellence**

Students demonstrate desirable strength of character and attitudes in their personal and industry endeavors.







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## ST. CLARE COLLEGE K-12 CURRICULUM GRADUATE ATTRIBUTES

### Quality Service and Collaboration

Students exemplify the potentialities of an efficient, responsible and well-rounded students/individual committed to quality service/academic excellence, honest toil and collaboration.

### Adeptness in the Use of Information Communication Technology (ICT) Modern Facilities

Students are skillful and knowledgeable in the use of digital learning devices/facilities, including technical and numerical skills.

### Community Engagement

Students assume an active role in organizing projects, programs and activities to help and advance the interest and welfare of the people in their respective communities.

### Passionate to Perpetual Learning

Students are committed to continually advance their knowledge and technical skills in order to keep themselves abreast to the needs and challenges of their academic track or strand, both nationally and globally.

### Strong Sense of Spiritual and Moral Values

Students are morally and spiritually upright in their day to day undertakings.





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## GOALS AND OBJECTIVES

### Goal 1: Effective, Efficient And Excellent Management Operation And Control

- Objective 1 – Restructure the organizational structure of the school;
- Objective 2 – Sustain a powerful school culture of excellence that inspires intellectual creativity and a passion for making a difference; and
- Objective 3 – Responsible and considerable budgetary allocation and funding requirements of the school.

### Goal 2: Educational Quality And Excellence

- Objective 1 – provide an opportunity to receive quality education that is globally competitive based on a pedagogically sound curriculum that is at par with international standards;
- Objective 2 – provide an enriched learner-centered instruction / outcomes based education (OBE);
- Objective 3 – increase national & international competitiveness of students;
- Objective 4 – Improve Learning For Diverse Student Population by making education learner-oriented and responsive to the needs, cognitive and cultural capacity, the circumstances and diversity of learners, schools and communities through the appropriate languages of teaching and learning, including mother tongue as a learning resource;
- Objective 5 - Broaden the goals of high school education for college preparation, vocational and technical career opportunities as well as creative arts, sports and entrepreneurial employment in a rapidly changing and increasingly globalized environment; and
- Objective 6 - promote quality and excellence, access and equity, efficiency and effectiveness, and relevance and responsiveness education.





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## GOALS AND OBJECTIVES

### Goal 3: Harmonized Curriculum and Dynamic Learning Environment

Objective 1 – provide an atmosphere where engagement and passion for learning thrives by formulating the design and details of the enhanced K-12 curriculum. It craft harmonized basic and tertiary curricula for the global competitiveness of the graduates. Thus, ensure college readiness and to avoid remedial and duplication of basic education subjects, the DepED shall coordinate with the CHED and the Technical Education and Skills Development Authority (TESDA) curriculum/instruction by incorporating the 21<sup>st</sup> century skills as prescribed in the United Nations (UN) transformative learning;

Objective 2 – equip students with Information, media and technology skills, Learning and innovation skills, Effective communication skills, and Life and career skills.;

Objective 3 - undertake consultations among the students, parents, teachers, community, alumni and other relevant government agencies;

Objective 4 – design a learner-centered, inclusive and developmentally appropriate, relevant, responsive and research-based;

Objective 5 - utilize spiral progression approach to ensure mastery of knowledge and skills after each level; and

Objective 6 –build a world class Learning Resource Center (LCR) e-library.

### Goal 4: Research Excellence

Objective 1 – build areas of distinction through research, innovative and creative scholarly activities across all disciplines;

Objective 2 – enhance research capabilities, and disseminate and implement research findings;





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## GOALS AND OBJECTIVES

### Goal 5: Empowered Faculty Member

- Objective 1 – enhance faculty recruitment, hiring, retention and development;
- Objective 2 – provide opportunities for national and international engagement of the faculty;
- Objective 3 – build on excellent faculty; and
- Objective 4 - encourage the faculty members and students in the pursuit of useful knowledge, skills and upright attitudes/values.

### Goal 6: Effective And Efficient Campus Leadership

- Objective 1 – establish a sound climate that actively supports sustainability and stewardship of the campuses; and
- Objective 2 – establish and maintain a fully-wired digitalized college campus.

### Goal 7: Strengthened Community Engagement

- Objective 1 – strengthened good relationship with external publics; and
- Objective 2 – provide extension programs that are responsive to the needs of the community for the people empowerment and self-reliance;

### Goal 8: Sustainable Technology Driven Service

- Objective 1 - contribute to the realization of sustainable development goals (SDGs);
- Objective 2 – build virtual high powered ICT facilities to support faculty and students, including online self-help facilities and digital/electronic access to it support staff





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## GOALS AND OBJECTIVES

### **Goal 9: Expanded Collaborative Partnership & Networking**

Objective 1 – take the lead in building partnerships, linkages, and other twinning or dual arrangements with industries, government and non-government agencies, and other schools;

Objective 2 – restructure organization to effectively serve its stakeholders; and

Objective 3 – collaborate with professional organizations, governmental and non-governmental agencies, and the larger community to translate the academic programs into concrete projects, and activities.

### **Goal 10: Empowered Stakeholders**

Objective 1 – empower the academic and administrative personnel;

Objective 2 – keep the stakeholders posted about the developments in the school to ensure that proper consultation procedures are followed;

Objective 3 – establish alumni contact throughout the country and the world to ensure that the alumni are well informed of and regularly consulted about the roles they need to perform in building and enhancing the good image of St. Clare college;

Objective 4 – collaborate with professional organizations, government and non-government agencies to keep abreast the latest developments.

Objective 5 - accelerate the socio-economic development of the national capital region and the entire country by making K-12 and College education affordable and accessible.





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## DECLARATION OF PRINCIPLES

*The college hereby declares the following principles:*

1. the College shall contribute to the realization of Sustainable Development Goals (SDGs);
2. the College shall promote quality and excellence, access and equity, efficiency and effectiveness, and relevance and responsiveness education;
3. the College shall help accelerate the socio-economic development of the national capital region and the entire country by making basic and college education affordable and accessible;
4. the College shall encourage the faculty members and students in the pursuit of useful knowledge, skills and upright attitudes/values; and
5. the College shall generate research and income generation projects which shall maximize institutional development and support sustainable development education.



## BACKGROUND

On August 15, 2012, Republic Act No. 10173, otherwise known as the “Data Privacy Act of 2012” (DPA), was enacted. The DPA aims to espouse the fundamental human right of privacy and of communication while ensuring the free flow of information to facilitate innovation and growth. Through this legislation, the State recognizes the vital role of information and communications technology in nation-building and its intrinsic duty to secure and protect personal information in information and communications system in the government and in the private sector.

The DPA, its Implementing Rules and Regulations (IRR), and other pertinent issuances of the National Privacy Commission (NPC), require the following:

the adherence to the principles of transparency, legitimate purpose, and proportionality in the processing of personal data;

the implementation of reasonable and appropriate organizational, physical, and technical security measures for the protection of personal data thereby upholding an individual’s data privacy rights; and

the creation of NPC, which serves as the independent body tasked to administer and implement the DPA, and to monitor and ensure compliance of the country with international standards set for personal data protection.

Pursuant to the foregoing data privacy policies, **St. Clare College of Caloocan (ST. CLARE COLLEGE)**, private educational institution committed to provide not only quality education but also reliable information technology services to its students, faculty members, and administrative staff, observes reasonable and appropriate measures to protect personal data against natural dangers such as accidental loss or destruction, and human dangers such as unlawful access, fraudulent misuse, unlawful destruction, alteration and contamination.

To ensure its compliance with the DPA, the IRR, and other pertinent NPC issuances, **ST. CLARE COLLEGE** provides this Data Privacy Manual for the guidance of its personnel. The Data Privacy Manual sets forth the data privacy and protection protocols that **ST. CLARE COLLEGE** personnel must uphold in the performance of duties to fulfill the rights of data subjects.

## I. INTRODUCTION

In compliance with the DPA, the IRR, and other pertinent NPC issuances, **ST. CLARE COLLEGE** adopts this Data Privacy Manual. Aside from striving to provide quality, affordable, and sustainable development education, **ST. CLARE COLLEGE** respects the data privacy rights of its students, employees, and all other persons and values the principles of transparency, legitimate purpose, and proportionality in the processing of personal data.

The Data Privacy Manual lays down data protection and security measures observed by **ST. CLARE COLLEGE**. It may serve as a guide for data subjects in the exercise of their rights under the DPA.

## II. DEFINITION OF TERMS

Consistent with the DPA, the IRR, and other pertinent NPC issuances, the following terms shall have the respective meanings hereafter set forth:

- A. *Authorized personnel* refers to the officers or employees of **ST. CLARE COLLEGE** specifically authorized to collect and/or process personal data either by function of their office or position or through specific authority given in accordance with **ST. CLARE COLLEGE**'s rules and policies.
- B. *Consent of the data subject* refers to any freely given, specific, informed indication of will, whereby the data subject agrees to the collection and processing of personal information about and/or relating to him/her. Consent shall be evidenced by written, electronic or recorded means. It may also be given on behalf of the data subject by an agent specifically authorized by the data subject to do so.
- C. *Data subject* refers to an individual whose personal information is processed by **ST. CLARE COLLEGE**. It may also refer to **ST. CLARE COLLEGE**'s officers, employees, consultants, and students, as well as the alumni.
- D. *Personal data* refers to all types of personal information.
- E. *Personal data breach* refers to a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored, or otherwise processed.



- F. *Personal information* refers to any information whether recorded in a material form or not, from which the identity of an individual is apparent or can be reasonably and directly ascertained by the entity holding the information, or when put together with other information would directly and certainly identify an individual.
- G. *Personal information controller* refers to a person or organization who controls the collection, holding, processing or use of personal information, including a person or organization who instructs another person or organization to collect, hold, process, use, transfer or disclose personal information on his/her behalf. The term excludes:
1. a person or organization who performs such functions as instructed by another person or organization; and
  2. an individual who collects, holds, processes or uses personal information in connection with the individual's personal, family or household affairs.
- H. *Personal information processor* refers to any natural or juridical person qualified to act as such under the DPA to whom a personal information controller may outsource the processing of personal data pertaining to a data subject.
- I. *Privileged information* refers to any and all forms of data which under the Rules of Court and other pertinent laws constitute privileged communication.
- J. *Processing* refers to any operation or any set of operations performed upon personal information including, but not limited to, the collection, recording, organization, storage, updating or modification, retrieval, consultation, use, consolidation, blocking, erasure or destruction of data.
- K. *Security incident* is an event or occurrence that affects or tends to affect data protection, or may compromise the availability, integrity and confidentiality of personal data. It includes incidents that would result to a personal data breach, if not for safeguards that have been put in place.
- L. *Sensitive personal information* refers to personal information:
1. about an individual's race, ethnic origin, marital status, age, color, and religious, philosophical or political affiliations;

2. about an individual's health, education, genetic or sexual life of a person, or to any proceeding for any offense committed or alleged to have been committed by such person, the disposal of such proceedings, or the sentence of any court in such proceedings;
3. issued by government agencies peculiar to an individual which includes, but not limited to, social security numbers, previous or current health records, licenses or its denials, suspension or revocation, and tax returns; and
4. specifically established by an executive order or an act of Congress to be kept classified.

### III. SCOPE AND LIMITATIONS

The Data Privacy Manual governs the acts of **ST. CLARE COLLEGE's** employees, regardless of the type of employment or contractual arrangement, students under the guidance and supervision of **ST. CLARE COLLEGE's** employees and agents, and persons so authorized by **ST. CLARE COLLEGE** to access personal data such as third-party service providers, contract counterparties, partners, subcontractors, and outsources.

**ST. CLARE COLLEGE** reserves the right to regulate the use of all personal data under its control and asserts authority over any such information that may be accessed by its offices through whatever means.

### IV. PROCESSING OF PERSONAL DATA

In the processing of personal data, **ST. CLARE COLLEGE** observes the provisions of the DPA, the IRR, and other pertinent NPC issuances. It strongly upholds the principles of transparency, legitimate purpose, and proportionality.

#### A. Types of Personal Data Processed

1. personal information such as name, birth, sex, civil status, and affiliations
2. contact details such as address, e-mail address, mobile number, and telephone number
3. academic information such as enrollment history, grades, courses, programs, student number, and class standing
4. employment information such as previous and current employers, positions, and functions

5. applicant information such as educational background and previous employment
6. medical information such as physical, psychiatric, and psychological conditions and history

## **B. Collection**

Authorized personnel shall not collect personal information and sensitive personal information unless the following requirements are satisfied:

1. the collection is for specified and legitimate purposes determined and declared before, or as soon as reasonably practicable thereafter;
2. the collection is for specified and legitimate purposes determined and declared before, or as soon as reasonably practicable thereafter;
3. the personal information and/or sensitive personal information is adequate and not excessive in relation to the purposes for which they are collected and processed;
4. the consent of the data subject is secured; and
5. the means to collect is lawful, fair, and not unreasonably intrusive, which shall be explained to the data subject.

Authorized personnel shall likewise train students engaged in research work to follow **ST. CLARE COLLEGE**'s principles and protocols related to data privacy and confidentiality in addition to policies regarding intellectual honesty and integrity and the ethical treatment of research subjects.

## **C. Use**

Authorized personnel shall use the personal data collected only for purposes of:

1. compliance with laws, rules and regulations, and official issuances of the government;
2. operations as an educational institution;
3. administering compensation and benefits to employees;
4. disciplinary proceedings of students and employees;
5. documentation.

## **D. Storage, Retention, and Destruction (F1.1)**

**ST. CLARE COLLEGE** shall ensure that personal data are protected against any accidental or unlawful destruction, alteration and disclosure, as well as against any other unlawful processing. It shall implement appropriate security measures in storing collected personal information, depending on the nature of the information. All personal data gathered shall form part of the permanent records of data subjects and may be destroyed upon the order of a court or by virtue of the relevant laws, rules, or regulations.

## **E. Access**

Due to the sensitive and confidential nature of the personal data, only authorized personnel and the students involved shall be allowed to access such personal data, for any purpose, except for those contrary to law, public policy, public order or morals.

## **F. Disclosure and Sharing**

All officers and employees of **ST. CLARE COLLEGE** shall maintain the confidentiality and secrecy of all personal data that come to their knowledge and possession, even after resignation, termination of contract, or other contractual relations. Personal data under the custody of **ST. CLARE COLLEGE** shall be disclosed only pursuant to a lawful purpose, and to authorized recipients of such data.

## **V. SECURITY MEASURES**

**ST. CLARE COLLEGE** shall implement reasonable and appropriate organizational, physical, and technical measures to protect personal data against any accidental or unlawful destruction, alteration and disclosure, as well as against any other unlawful processing.

### **A. Organizational Security Measures**

#### **1. Designation of a Data Protection Officer (DPO)**

**ST. CLARE COLLEGE** shall designate an employee who shall function as a DPO. The DPO shall have the following duties and responsibilities:

- a. monitor **ST. CLARE COLLEGE**'s compliance with the DPA, the IRR, pertinent NPC issuances, and other applicable laws and policies. For this purpose, he/she may:

- i. collect information to identify the processing operations, activities, measures, projects, programs, or systems of **ST. CLARE COLLEGE**, and maintain a record thereof;
  - ii. analyze and check the compliance of processing activities, including the issuance of security clearances to and compliance by third-party service providers, if any;
  - iii. inform, advise, and issue recommendations to **ST. CLARE COLLEGE**;
  - iv. ascertain renewal of accreditations or certifications necessary to maintain the required standards in personal data processing; and
  - v. advise **ST. CLARE COLLEGE** as regards the necessity of executing a Data Sharing Agreement with third parties, and ensure its compliance with the law;
- b. ensure the conduct of Privacy Impact Assessments (PIA) relative to activities, measures, projects, programs, or systems of **ST. CLARE COLLEGE**;
  - c. advise **ST. CLARE COLLEGE** regarding complaints and/or the exercise by data subjects of their rights (*e.g.*, requests for information, clarifications, rectification or deletion of personal data);
  - d. ensure proper data breach and security incident management by **ST. CLARE COLLEGE**, including the latter's preparation and submission to the NPC of reports and other documentation concerning security incidents or data breaches within the prescribed period;
  - e. inform and cultivate awareness on privacy and data protection within the organization of **ST. CLARE COLLEGE**, including all relevant laws, rules and regulations and issuances of the NPC;
  - f. advocate for the development, review and/or revision of policies, guidelines, projects and/or programs of **ST. CLARE COLELGE** relating to privacy and data protection, by adopting a privacy by design approach;
  - g. serve as the contact person of **ST. CLARE COLLEGE** vis-à-vis data subjects, the NPC and other authorities in all matters concerning data privacy or security issues or concerns and **ST. CLARE COLLEGE**;
  - h. cooperate, coordinate and seek advice of the NPC regarding matters concerning data privacy and security; and

- i. perform other duties and tasks that may be assigned by **ST. CLARE COLLEGE** that will further the interest of data privacy and security and uphold the rights of the data subjects.

## **2. Conduct of trainings or seminars to keep personnel, especially the DPO updated vis-à-vis developments in data privacy and security**

**ST. CLARE COLLEGE** shall sponsor a mandatory training on data privacy and security at least once a year. For the authorized personnel, the management, through the DPO, shall ensure their attendance and participation in relevant trainings and orientations, as often as necessary.

**ST. CLARE COLLEGE** shall document the activities carried out by the DPO, or **ST. CLARE COLLEGE** itself, to ensure compliance with the DPA, the IRR, and other pertinent NPC issuances.

## **3. Conduct of PIA**

When deemed necessary, **ST. CLARE COLLEGE** shall conduct PIA relative to activities, projects, and systems involving the processing of personal data. It may choose to outsource the conduct of PIA to a third party.

## **4. Signing of a Confidentiality and Non-Disclosure Agreement**

**ST. CLARE COLLEGE** shall require its employees to sign a Confidentiality and Non-Disclosure Agreement. The Confidentiality and Non-Disclosure Agreement provides that the employees shall not use or disclose confidential and proprietary information, except to the extent necessary to lawfully discharge their official functions as employees of **ST. CLARE COLLEGE**. They shall be bound to hold confidential and proprietary information in strict confidence and observe a reasonable degree of care to prevent access thereto, reproduction, or disclosure without **ST. CLARE COLLEGE**'s knowledge and approval. In this regard, confidential and proprietary information refers to all data relating to or affecting the plans, systems, processes, methods, designs, techniques, devices, costs, project specifications, customers' profiles and personal data, marketing strategies, technical advice or knowledge communicated or delivered by **ST. CLARE COLLEGE** and/or its students, whether in tangible or intangible form, not generally known to the public at the time of disclosure. The employees' duty of confidentiality and non-disclosure survives even after resignation or termination of employment relationship.

## 5. Review of Data Privacy Manual

The Data Privacy Manual shall be reviewed and evaluated at least annually, or earlier if deemed required, to check compliance with privacy and security policies, contractual commitments, and relevant laws, rules and regulations. Privacy and security policies and practices within **ST. CLARE COLLEGE** shall be updated to remain consistent with current data privacy best practices.

### B. Physical Security Measures

#### 1. Format of personal data to be collected

Personal data in the custody of **ST. CLARE COLLEGE** may be in paper-based/physical format and digital/electronic format.

#### Storage type and location

Personal data being processed by **ST. CLARE COLLEGE** shall be placed in a data room, where paper-based documents are kept in locked steel cabinets while the digital/electronic files are stored in computers provided and installed by **ST. CLARE COLLEGE**.

**ST. CLARE COLLEGE** shall ensure that personal data, including but not limited to enrollment and disciplinary records, shall be complete and kept secure and confidential.

#### 3. Access to data room

Only the Registrar or his/her assistant holds the key to the data room. Employees may be allowed access to the data room upon filing of an access request form with the Office of the Registrar or the DPO.

#### 4. Monitoring and limitation of access to data room

Authorized personnel and employees whose access request was approved by the Office of the Registrar or the DPO must fill out and register access details in a logbook. They shall indicate the circumstances of their access such as the date, time, duration, and purpose of each access. The DPO shall regularly review the access details in the logbook.

#### 5. Design of office space/work station

Computers shall be arranged with considerable spaces in between to ensure privacy and to protect the processing of personal data. Employees should only access and/or use the computers assigned to them, unless the discharge of their official duties and functions entails accessing and/or using other computers.

## **6. Authorized personnel's duties and responsibilities**

Authorized personnel shall always maintain confidentiality and integrity of personal data. Unless allowed by **ST. CLARE COLLEGE's** management under certain or special circumstances, they are not permitted to bring their own gadgets or storage device of any form when entering the data room.

## **7. Modes of transfer of personal data within ST. CLARE COLLEGE or to third parties**

The transfer of personal data within **ST. CLARE COLLEGE** or to third parties shall be in furtherance to the purpose for which the personal data were collected. Transfers of personal data shall use a secure electronic mail facility, including any or all attachments. Facsimile technology shall not be used for transmitting documents containing personal data.

## **8. Retention and disposal procedure**

Personal data, whether stored physically or electronically, shall be destroyed and disposed using secure technology to prevent unauthorized processing, access, or disclosure to any party or the public that may compromise the rights and interests of data subjects.

## **C. Technical Security Measures**

### **1. Monitoring for security incidents**

**ST. CLARE COLLEGE** shall install an anti-virus software program in computers and devices used in the processing of personal data. The DPO, with the assistance of **ST. CLARE COLLEGE's** Information Technology (IT) Department, shall periodically check firewall logs to monitor any unauthorized attempt to access **ST. CLARE COLLEGE's** network.

### **2. Security features of the software/s and application/s used**

**ST. CLARE COLLEGE's** IT Department shall review and evaluate software applications before the installation thereof in computers and devices of **ST. CLARE COLLEGE** to ensure the compatibility of security features with overall operations.

### **3. Process for regularly testing, assessment, and evaluation of effectiveness of security measures**

**ST. CLARE COLLEGE** shall review security policies, conduct vulnerability assessments and perform penetration testing within the school on regular schedule to be prescribed by **ST. CLARE COLLEGE's** IT Department.



#### 4. Authentication process, and other technical security measures that control and limit access to personal data

Every officer/employee with access to personal data shall verify his/her identity using a secure encrypted link and multi-level authentication.

#### D. Online Learning Security Measures

Pursuant to Data Privacy Council Education Sector Advisory No. 2020-1, **ST. CLARE COLLEGE** observes the following measures to ensure adequate data protection in the conduct of online learning and other related activities:

1. **ST. CLARE COLLEGE** adopts the St. Clare Online Education System which composes of various sub systems including Learning Management System (LMS), Content Management System (CMS), Institutional Management System (IMS), Personal Management System (PMS) and Virtual Management System (VMS). To the extent possible, all activities pertaining to online learning are conducted via these platforms. **ST. CLARE COLLEGE** may likewise engage the services of third-party provider(s) of LMS and Online Productivity Platform (OPP).
2. Where the official LMS and/or OPP adopted by **ST. CLARE COLLEGE** is owned and/or provided by a third party, its use should be covered by a Data Processing Outsourcing Agreement, or any equivalent document. For this purpose, the presence or insertion of standard data protection clauses in the contract between **ST. CLARE COLLEGE** and the LMS or OPP provider and/or the terms and conditions governing the use of said LMS or OPP may be deemed sufficient.
3. Downloading of personal data stored in the LMS or OPP should be kept to a minimum and/or limited to that which is necessary for online learning.
4. Explicit consent of the student (or parent or legal guardian, in the case of minors) should be obtained before the conduct of online proctoring and the use of related tools or technologies.
5. An announcement or posting involving personal data such as grades and results of assignments should be made in a manner that only makes it viewable by the intended recipients.
6. Submissions via social media platforms are discouraged.

7. Posting or sharing of personal data, such as photos and videos, on social media, must have a legitimate purpose and be done using authorized social media accounts of the school.
8. If an authorized personnel has collected personal data in their official capacity and/or during an official activity, such data must not be used for personal purposes or reasons. **ST. CLARE COLLEGE** may consider the posting of such data using personal social media accounts a violation of data privacy policies, if any, and could merit disciplinary action. On other hand, if he/she collected personal data in his/her individual or personal capacity, but then decides to use it for work-related work purposes, he/she should first ask permission from the affected data subjects in accordance with the principles of fairness and transparency.

## **VI. BREACH AND SECURITY INCIDENTS**

**ST. CLARE COLLEGE** shall implement policies and procedures to manage, mitigate, and address personal data breaches and security incidents involving personal data.

### **A. Creation of Data Breach Response Team**

In the event of personal data breach or security incident, a Data Breach Response Team, comprising of the DPO and two (2) other employees, shall be tasked to undertake immediate and corrective action. The team shall conduct an initial assessment of the personal data breach or security incident to determine the nature and extent thereof. It shall timely implement measures to mitigate the adverse effects of the personal data breach or security incident. It shall strive to restore the integrity and security to the information and communications system.

### **B. Measures to prevent and minimize occurrence of personal data breach and security incident**

**ST. CLARE COLLEGE** should conduct a PIA, as may be deemed necessary, to identify the risks of the processing system and to monitor security breaches and vulnerability scanning of computer networks. It shall also periodically review policies and procedures being observed in the processing of personal data. Authorized personnel must attend trainings and seminars for capacity building.

### **C. Procedure for recovery and restoration of personal data**

**ST. CLARE COLLEGE** shall always maintain a backup file for all personal data under its custody. In the event of a personal data breach or security incident, it shall always compare the backup with the affected file to ascertain the presence of any inconsistencies or alterations resulting from the breach or incident.

### **D. Notification protocol**

#### **1. When notification is required**

**ST. CLARE COLLEGE** shall be required to make a notification of personal data breach when sensitive personal information or any other information that may, under the circumstances, be used to enable identity fraud are reasonably believed to have been acquired by an unauthorized person, and **ST. CLARE COLLEGE** or the NPC believes that such unauthorized acquisition is likely to give rise to a real risk of serious harm to any affected data subject.

The NPC and the affected data subjects shall be notified within seventy-two (72) hours upon knowledge of, or when there is reasonable belief by **ST. CLARE COLLEGE** that, a personal data breach requiring notification has occurred.

#### **2. What the notification must contain**

The notification shall at least describe the nature of the breach, the personal data possibly involved, and the measures taken by the entity to address the breach. It shall also include measures taken to reduce the harm or negative consequences of the breach, **ST. CLARE COLLEGE's** representatives, including their contact details, from whom the data subject can obtain additional information about the breach, and any assistance to be provided to the affected data subjects.

### **E. Documentation and reporting procedure of a personal data breach or security incidents**

The Data Breach Response Team shall prepare a detailed documentation of every personal data breach or security incident encountered, including those not covered by the notification requirements. In the case of personal data breaches, a report shall include the facts surrounding an incident, the effects of such incident, and the remedial actions taken by **ST. CLARE COLLEGE**. In other security incidents not involving personal data, a report containing aggregated data shall constitute sufficient documentation. These reports shall be made available when requested by the NPC. A general summary of the reports shall be submitted to the NPC annually.

## VII. RIGHTS, INQUIRIES, AND COMPLAINTS OF DATA SUBJECTS

### A. Rights

Every data subject is entitled to:

1. Be informed whether personal information pertaining to him/her shall be, are being or have been processed;
2. Be furnished the information indicated hereunder before the entry of his/her personal information into the processing system of the personal information controller, or at the next practical opportunity:
  - a. Description of the personal information to be entered into the system;
  - b. Purposes for which they are being or are to be processed;
  - c. Scope and method of the personal information processing;
  - d. The recipients or classes of recipients to whom they are or may be disclosed;
  - e. Methods utilized for automated access, if the same is allowed by the data subject, and the extent to which such access is authorized;
  - f. The identity and contact details of the personal information controller or its representative;
  - g. The period for which the information will be stored; and
  - h. The existence of their rights, i.e., to access, correction, as well as the right to lodge a complaint before the NPC.

Any information supplied or declaration made to the data subject on these matters shall not be amended without prior notification of data subject: *Provided*, That the notification under subsection (2) shall not apply should the personal information be needed pursuant to a *subpoena* or when the collection and processing are for obvious purposes, including when it is necessary for the performance of or in relation to a contract or service or when necessary or desirable in the context of an employer-employee relationship, between the collector and the data subject, or when the information is being collected and processed as a result of legal obligation;

3. Reasonable access to, upon demand, the following:

- a. Contents of his/her personal information that were processed;
- b. Sources from which personal information were obtained;
- c. Names and addresses of recipients of the personal information;
- d. Manner by which such data were processed;
- e. Reasons for the disclosure of the personal information to recipients;
- f. Information on automated processes where the data will or likely to be made as the sole basis for any decision significantly affecting or will affect the data subject;
- g. Date when his/her personal information concerning the data subject were last accessed and modified; and
- h. The designation, or name or identity and address of the personal information controller;

4. Dispute the inaccuracy or error in the personal information and have the personal information controller correct it immediately and accordingly, unless the request is vexatious or otherwise unreasonable. If the personal information have been corrected, personal information controller shall ensure the accessibility of both the new and the retracted information and the simultaneous receipt of the new and the retracted information by recipients thereof: *Provided*, That the third parties who have previously received such processed personal information shall be informed of its inaccuracy and its rectification upon reasonable request of the data subject;

5. Suspend, withdraw or order the blocking, removal or destruction of his/her personal information from the personal information controller's filing system upon discovery and substantial proof that the personal information are incomplete, outdated, false, unlawfully obtained, used for unauthorized purposes or are no longer necessary for the purposes for which they were collected. In this case, the personal information controller may notify third parties who have previously received such processed personal information; and

6. Be indemnified for any damages sustained due to such inaccurate, incomplete, outdated, false, unlawfully obtained or unauthorized use of personal information.

## **B. Inquiries**

Every data subject may inquire or request for information regarding any matter relative to the processing of personal data under the custody of **ST. CLARE COLLEGE**, including the data privacy and security policies observed to ensure the protection of his/her personal data. He/she may write to **ST. CLARE COLLEGE** at [stclarecollege.edu@gmail.com](mailto:stclarecollege.edu@gmail.com) or through its Data Protection Officer at [atty.paoadalem.stclarecollege@gmail.com](mailto:atty.paoadalem.stclarecollege@gmail.com) and briefly discuss the inquiry, together with their contact details for reference.

## **C. Complaints**

Complaints shall be filed in three (3) printed copies, or sent to [stclarecollege.edu@gmail.com](mailto:stclarecollege.edu@gmail.com) or [atty.paoadalem.stclarecollege@gmail.com](mailto:atty.paoadalem.stclarecollege@gmail.com). The DPO shall instruct the concerned department or unit to confirm with the complainant the receipt of the complaint.

**VIII. EFFECTIVITY**

This Data Privacy Manual takes effect on 6 January 2021, until revoked or amended by **ST. CLARE COLLEGE** through a Board Resolution.

**IX. ANNEXES**

- Annex "A" - Data Privacy Policy
- Annex "B" - Data Privacy Consent Form
- Annex "C" - Data Subject Rights Request Form
- Annex "D" - Data Privacy Inquiry Form
- Annex "E" - Employee's Access Request Form
- Annex "F" - Confidentiality and  
Non-Disclosure Agreement

## ANNEX "A"

**DATA PRIVACY POLICY**

**St. Clare College of Caloocan (ST. CLARE COLLEGE)** is a private educational institution committed to provide quality, affordable, and sustainable development education while ensuring the privacy, protection, and security of personal data. To this end, it observes the provisions of Republic Act No. 10173, otherwise known as the "Data Privacy Act of 2012" (DPA), its Implementing Rules and Regulations, and other pertinent issuances of the National Privacy Commission. It strongly upholds the principles of transparency, legitimate purpose, and proportionality in the processing of personal data.

**Collection of Personal Data**

**ST. CLARE COLLEGE** collects personal data such as your full name, contact number, address, electronic mail address, and such other information necessary to accomplish its lawful functions and operations. In collecting personal data, it ensures that the following requirements are satisfied: (1) the collection is for specified and legitimate purposes determined and declared before, or as soon as reasonably practicable thereafter; (2) the collection is reasonably necessary or directly related to any of **ST. CLARE COLLEGE**'s functions or activities; (3) personal information and/or sensitive personal information is adequate and not excessive in relation to the purposes for which they are collected and processed; (4) the consent of the data subject is secured; and (5) the means to collect is lawful, fair, and not unreasonably intrusive, which shall be explained to the data subject.

**Use of Personal Data**

**ST. CLARE COLLEGE** shall use the personal data collected only for purposes of: (1) compliance with laws, rules and regulations, and official issuances of the government; (2) operations as an educational institution; (3) administering compensation and benefits to employees; (4) disciplinary proceedings of students and employees; and (5) documentation.

**Protection of Personal Data**

**ST. CLARE COLLEGE** shall ensure that personal data are protected against any accidental or unlawful destruction, alteration and disclosure, as well as against any other unlawful processing. It shall implement appropriate security measures in storing collected personal information, depending on the nature of the information. All personal data gathered shall form part of the permanent records of data subjects and may be destroyed upon the order of a court or by virtue of the relevant laws, rules, or regulations.

**Your Rights as Data Subjects**

**ST. CLARE COLLEGE** respects and recognizes your rights as data subjects under the DPA. Subject to applicable rules and regulations, you have the following rights: (1) right to be informed; (2) right to object; (3) right to access; (4) right to rectify or correct erroneous data; (5) right to erase or block; (6) right to secure data portability; (7) right to be indemnified for damages; and (8) right to file a complaint.

**Contact Us**

For your data privacy-related inquiries, questions, or concerns, you may contact our Data Protection Officer, Atty. Jay Paolo C. Adalem, at [atty.paoadalem.stclarecollege@gmail.com](mailto:atty.paoadalem.stclarecollege@gmail.com).



## ANNEX "B"

**DATA PRIVACY CONSENT FORM**

**St. Clare College of Caloocan (ST. CLARE COLLEGE)** is a private educational institution committed to provide quality, affordable, and sustainable development education while ensuring the privacy, protection, and security of personal data. Pursuant to Republic Act No. 10173, otherwise known as the "Data Privacy Act of 2012," its Implementing Rules and Regulations, and other pertinent issuances of the National Privacy Commission, it implements reasonable and appropriate organizational, physical and technical measures intended for the protection of personal information.

To enable **ST. CLARE COLLEGE** to discharge its official and lawful duties, I authorize and give consent to **ST. CLARE COLLEGE** to collect, store, retain, and process my personal information and/or sensitive personal information as set forth in my record form and/or any other form or document that I will submit to **ST. CLARE COLLEGE**, whether manually or electronically.

I understand that **ST. CLARE COLLEGE** collects personal information/sensitive personal information to perform legitimate functions of complying with laws, rules and regulations, and official issuances of the government, both as an educational institution and as an employer, and of conducting licit business operations to satisfy its contractual obligations to its students. I further acknowledge that all personal data gathered shall form part of the permanent records of data subjects and may be destroyed upon the order of a court or by virtue of the relevant laws, rules, or regulations.

I have read this form, understood its contents, and consent to the processing of my personal data. I understand that my consent does not preclude the existence of other criteria for lawful processing of personal data, and does not waive any of my rights under the Data Privacy Act of 2012 and other pertinent laws, rules and regulations, and official issuances of the government.

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**Signature over Printed Name**

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**Date Signed**

ANNEX “C”

**DATA SUBJECT RIGHTS REQUEST FORM**

Date of Request	
<b>INFORMATION ABOUT THE DATA SUBJECT</b>	
Name	
Contact Number	
Address	
E-mail Address	
<b>INFORMATION ABOUT THE REQUESTOR (IF NOT THE DATA SUBJECT)</b>	
Name	
Contact Number	
Address	
Email Address	
Verification Requirements Attached	<input type="radio"/> Proof of Identity <input type="radio"/> Data Subject’s Written Authority <input type="radio"/> Data Subject’s Proof of Identity
<b>RIGHT TO EXERCISE</b>	
<input type="radio"/> Right to Object <input type="radio"/> Right to Access <input type="radio"/> Right to Rectify <input type="radio"/> Right to Erasure or Blocking	
<b>DESCRIPTION OF THE REQUEST</b>	
<b>REASON FOR THE REQUEST</b>	
<b>PREFERRED WAY FOR FEEDBACK ON THE REQUEST</b>	
<input type="radio"/> In writing <input type="radio"/> Via electric format <input type="radio"/> Collect the information in person <input type="radio"/> Others (please specify): _____	

I declare that all the details I have provided in this form are true and complete to the best of my knowledge. I understand that it is necessary for **ST. CLARE COLLEGE** to confirm my and/or the data subject’s identity and that it may be further imperative for **ST. CLARE COLLEGE** to obtain more detailed information, in order to properly act on my request.

\_\_\_\_\_  
**Signature of Data Subject/Requestor**

\_\_\_\_\_  
**Date Signed**

ANNEX “D”

**DATA PRIVACY INQUIRY FORM**

For your data privacy-related inquiries, questions, or concerns with **ST. CLARE COLLEGE OF CALOOCAN**, please provide the following information:

<b>Date of Inquiry</b>	
<b>Name</b>	
<b>Contact Number</b>	
<b>E-mail Address</b>	
<b>Message</b>	

*Note: This Data Privacy Inquiry Form may be sent **ST. CLARE COLLEGE OF CALOOCAN**'s Data Privacy Officer, Atty. Jay Paolo C. Adalem, at [atty.pao.stclarecollege@gmail.com](mailto:atty.pao.stclarecollege@gmail.com), or to **ST. CLARE COLLEGE OF CALOOCAN**'s office at Zabarte Road, Camarin, Caloocan City, 1400 Metro Manila, Philippines.*

ANNEX “E”

**EMPLOYEE’S ACCESS REQUEST FORM**

Date of Request	
Name	
Position	
Department	
Data to be Accessed	
Reason for the Request	

I declare that all the details I have provided in this form are true and complete to the best of my knowledge. I understand that it is necessary for **ST. CLARE COLLEGE OF CALOOCAN** to confirm my and/or the data subject’s identity and it may be further imperative for **ST. CLARE COLLEGE OF CALOOCAN** to obtain more detailed information, in order to properly act on my request.

\_\_\_\_\_  
**Signature of Employee**

\_\_\_\_\_  
**Date Signed**

**OFFICE OF THE REGISTRAR’S/DATA PRIVACY OFFICER’S  
 FEEDBACK**

REQUEST APPROVED

REQUEST DENIED

Remarks: \_\_\_\_\_

\_\_\_\_\_  
**Signature over Printed Name**

\_\_\_\_\_  
**Date Signed**

## ANNEX "F"

**CONFIDENTIALITY AND  
NON-DISCLOSURE AGREEMENT**

This Confidentiality and Non-Disclosure Agreement (the "Agreement") is made and executed this \_\_\_\_\_ at \_\_\_\_\_ by and between:

**St. Clare College of Caloocan (ST. CLARE COLLEGE)**, a non-stock, non-profit educational institution duly organized and existing under and by virtue of the laws of the Republic of the Philippines, with office address at Zabarte Road, Brgy. 177, Camarin, Caloocan City, represented herein by its duly authorized Chairman & President, **DR. CLARITA G. ADALEM**;

- and -

\_\_\_\_\_ (the "**Employee**"), of legal age, Filipino, an employee of **ST. CLARE COLLEGE**, and with address at \_\_\_\_\_.

**ST. CLARE COLLEGE** hired the **Employee** as \_\_\_\_\_ pursuant to the terms and conditions set forth in the Employment Agreement dated \_\_\_\_\_. In the course of the performance by the **Employee** of his/her duties, **ST. CLARE COLLEGE** and/or its students may disclose to him/her certain confidential and proprietary information crucial to their business operations. As such, **ST. CLARE COLLEGE** and the **Employee** agree to be bound by the following provisions:

- I. **CONFIDENTIAL AND PROPRIETARY INFORMATION.** Confidential and proprietary information shall refer to all data relating to or affecting the plans, systems, processes, methods, designs, techniques, devices, costs, project specifications, customers' profiles and personal data, marketing strategies, technical advice or knowledge communicated or delivered by **ST. CLARE COLLEGE** and/or its students, whether in tangible or intangible form, not generally known to the public at the time of disclosure.
- II. **PROTECTION OF CONFIDENTIAL AND PROPRIETARY INFORMATION.** The **Employee** shall not use or disclose confidential and proprietary information, except to the extent necessary to lawfully

discharge his official functions as an employee of **ST. CLARE COLLEGE**. He/She shall hold confidential and proprietary information in strict confidence and observe a reasonable degree of care to prevent access thereto, reproduction, or disclosure without **ST. CLARE COLLEGE**'s knowledge and approval.

- III. TERM.** This Agreement shall become effective as of the date of execution and shall survive after the **Employee**'s resignation or termination of employment relationship.
- IV. BREACH.** In the event of breach by the **Employee** of any of the provisions of this Agreement, **ST. CLARE COLLEGE** reserves the right to commence disciplinary proceedings in addition to pursuing civil and/or criminal actions as may be warranted under the circumstances.
- V. RETURN OF CONFIDENTIAL AND PROPRIETARY INFORMATION.** In the event of the **Employee**'s resignation or termination of employment relationship, he/she shall return to **ST. CLARE COLLEGE** all materials, documents, electronic files, and any other properties containing confidential and proprietary information he/she obtained in the course of his/her employment.
- VI. GOVERNING LAW.** The validity, enforcement, and construction of this Agreement shall be governed by Philippine laws.

Signed this \_\_\_\_ day of \_\_\_\_\_ 20\_\_.

**ST. CLARE COLLEGE OF CALOOCAN**  
**represented by:**

\_\_\_\_\_  
**Signature over Printed Name**

**EMPLOYEE:**

\_\_\_\_\_  
**Signature over Printed Name**