

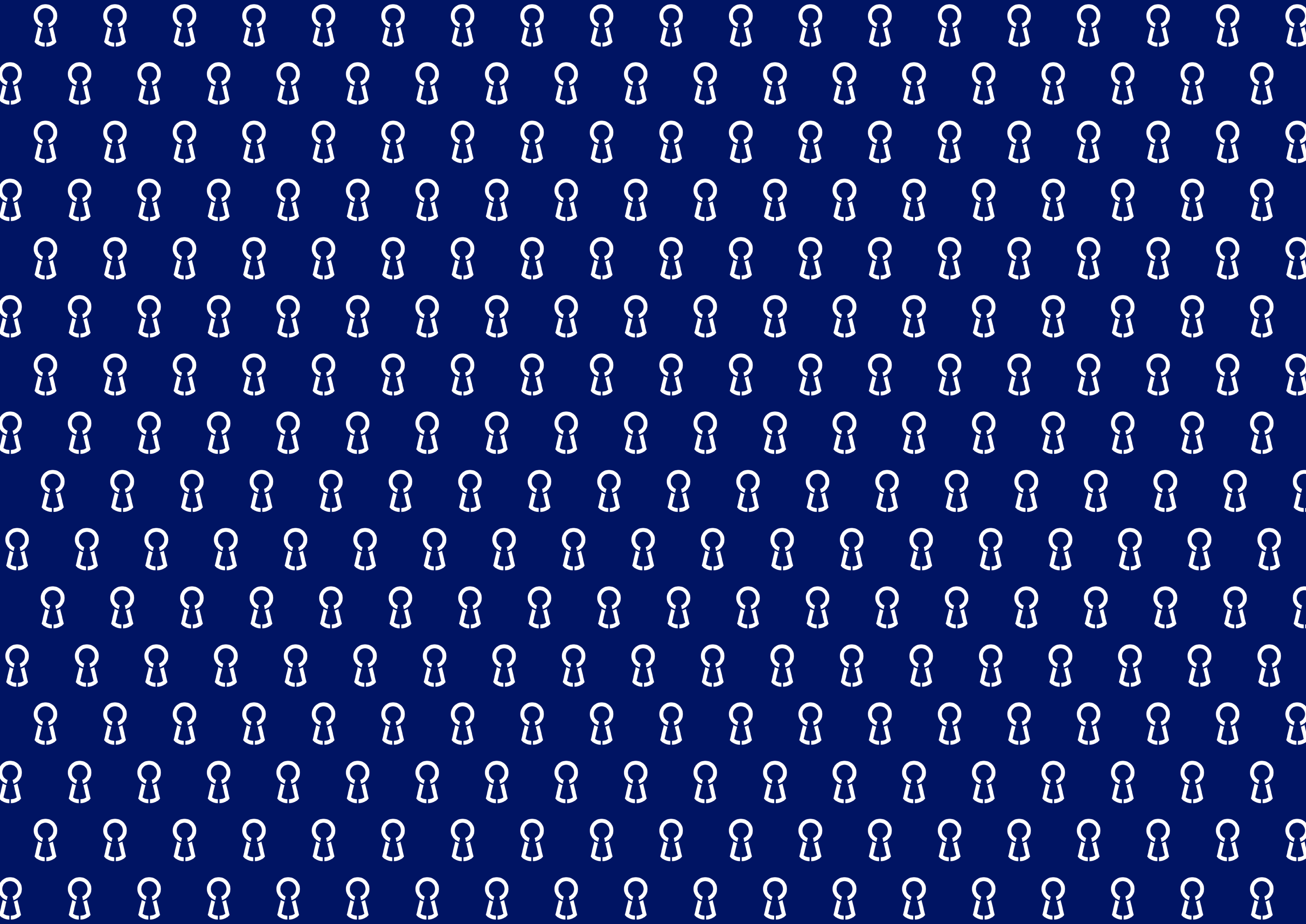


NATIONAL  
PRIVACY  
COMMISSION

# LAYING *the* GROUNDWORK

THE 2016 PERFORMANCE REPORT

20  
16





**PRODUCED BY**

The National Privacy Commission

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# Privacy Commissioner's Notes

2016 was not the ordinary start-up year for the National Privacy Commission. Just a few weeks after I took my oath of office in March, the largest data breach in Philippine history happened. Hacking attacks exposed the sensitive personal information of over 55 million Filipino voters held by the Commission on Elections (COMELEC) in the so-called Comeleak. In the time it takes a typical new organization to fill up its ranks and chart its roadmap, we at the NPC had to simultaneously build our organization brick by brick while ramping up our efforts to turn the situation around – to convert the challenges that Comeleak presented into opportunities. I am proud of the fact that we succeeded in doing both.

To do this, we started by putting policies in place. We developed the Implementing Rules and Regulations (IRR) of the Data Privacy Act of 2012, in consultation with our stakeholders. Four memorandum circulars were also formulated to guide compliance with the DPA and its IRR. To further shed light on the provisions of these policies, advisory opinions and policy papers on related issues were prepared. To more effectively build a culture of partnership and trust within

the sector, our staff worked tirelessly to extend technical assistance to organizations both public and private. We also started working on our registration system to link us with personal information controllers and processors, and serve as an initial stimulus for compliance with the law.

In the course of our investigation, the Comeleak hit the headlines and generated public interest about data privacy. We maximized this opportunity to translate our policies into information materials that were cost-efficiently circulated through the budding online presence of the NPC. We also disseminated these materials during agency orientations, media briefings, and other awareness and education activities.

Two milestones capped the year off: Our first data privacy summit entitled, "Privacy.Gov.PH: Government at the Forefront of Protecting the Filipino in the Digital World" with over 250 participants; and the issuance of our decision recommending the criminal prosecution of COMELEC Chairman Juan Andres D. Bautista for the massive data breach.

With these accomplishments, the NPC was able to secure membership in two international associations, namely: the International Conference of Data Protection and Privacy Commissioners and the Asia Pacific Privacy Authorities.

Having the right people was integral in achieving these milestones. Through our robust recruitment system, we were able to fill 51 percent of our total staff requirement just by the end of December. We intend to continue this culture of hiring competent people so that the NPC may tirelessly fulfill its mandate and demonstrate commitment to the Filipino people.

I must say we triumphed over adversity in 2016 by starting strong and aggressive in protecting citizens' data privacy rights. We did this with a lot of help from our stakeholders. Thus, we look forward to a stronger collaboration with the public and private sector towards making a culture protective of personal data privacy flourish in the Philippines.

**Raymund Enriquez Liboro**  
PRIVACY COMMISSIONER AND CHAIRMAN





# A message from Atty. Rodolfo A. Salalima

SECRETARY OF THE DEPARTMENT OF INFORMATION  
AND COMMUNICATIONS TECHNOLOGY (DICT)

Congratulations to the National Privacy Commission (NPC) on the successful holding of Privacy.Gov. PH – Government at the Forefront of Protecting the Filipino in the Digital World, the first-ever data privacy summit in the country, and an impressive and fitting conclusion to your first year of public service.

After the Data Privacy Act (DPA) was signed into law on August 15, 2012, it became state policy to ensure protection not just of the people, but also of their personal data – seeing to it that people’s privacy rights are safeguarded in an era when the civil liberties of individuals are endangered and can be easily abused by perpetrators of cybercrimes and data processing malpractices.

In creating the NPC, the law gave it ample authority to match and respond to its arduous task. It was, thus, created to function as an independent quasi-judicial body attached to the Department of Information and Communications Technology (DICT).

What the law cannot provide, however, is the drive and zeal of Team NPC. And for this I commend the inspired leadership that guides the Commission. In as short as one year and with only meager initial resources against huge challenges, the newly minted agency has proven its capacity for quality public service. More important, the National Privacy Commission has shown that it has what it takes to turn the DPA from a fine piece of legislation into a visible instrument for the common good.

May the Commission build on its early successes a lasting legacy of excellent public service.

And to the men and women of NPC, the DICT is proud that we are one family!

**May the  
Commission build  
on its early successes  
a lasting legacy  
of excellent public  
service.**

NPC’s achievements in 2016 set the ground for the Commission’s next rounds of new milestone projects and undertakings. And I look forward to all this with much confidence and great anticipation.

**Atty. Rodolfo A. Salalima**  
DICT SECRETARY





# About Us

The National Privacy Commission or NPC is the country's privacy watchdog; it is an independent body mandated to administer and implement the Data Privacy Act of 2012, and to monitor and ensure compliance of the country with international standards set for data protection.

The Commission is headed by a Privacy Commissioner who serves as the Chairperson. The Privacy Commissioner is assisted by two Deputy Privacy Commissioners.

## THE VISION AND MISSION



A world-class regulatory and enabling agency upholding the right to data privacy, ensuring personal data protection while promoting the free flow of information; committed to excellence, driven by a workforce that is highly competent, future-oriented, and ethical, towards a competitive, knowledge-based, and innovative nation.



We shall continuously deliver services to:

- 1  
Be the authority on data privacy and protection, providing knowledge, know-how and relevant technology;
- 2  
Establish a regulatory environment that ensures accountability in the processing of personal data and promotes global standards for data privacy and protection; and
- 3  
Build a culture of privacy through people empowerment that enables and upholds the right to privacy and supports free flow of information.

The NPC is an attached agency of the Department of Information and Communications Technology for policy and program coordination purposes, but is completely independent in the performance of the following functions:

### RULE-MAKING

develop, promulgate, review or amend rules and regulations for the effective implementation of the Republic Act No. 10173 or the Data Privacy Act (DPA) of 2012

### COMPLIANCE AND MONITORING

monitor and ensure compliance for the effective implementation of the DPA

### ADVISORY

serve as the advisory body on matters affecting protection of personal data

### ENFORCEMENT

effectively implement the DPA, its Implementing Rules and Regulations and issuances, and enforce its Orders, Resolutions or Decisions, including the imposition of administrative sanctions, fines, or penalties

### PUBLIC EDUCATION

inform and educate the public on data privacy, data protection, and fair information rights and responsibilities

### COMPLAINTS AND INVESTIGATIONS

adjudicate on complaints and investigations on matters affecting personal data



# At the Helm of Protecting Your Right to Information Privacy

## THE SENIOR LEADERSHIP OF THE NPC

The Data Privacy Act created the National Privacy Commission to implement the law and to ensure compliance of the country with international standards set for data protection. Section 7 of the law defines the functions of the Commission, while Sections 13 and 14 of the Implementing Rules and Regulations of the Data Privacy Act outlines the organizational structure and secretariat of the National Privacy Commission.



**Raymund Enriquez Liboro**  
Privacy Commissioner and Chairman

**Atty. Ivy D. Patdu**  
Deputy Privacy Commissioner

**Damian Domingo O. Mapa**  
Deputy Privacy Commissioner



# Laying the Groundwork in 2016

The first few milestones of the National Privacy Commission

JANUARY

FEBRUARY

MARCH

APRIL

MAY

JUNE

JULY

AUGUST

SEPTEMBER

OCTOBER

NOVEMBER

DECEMBER

**7 March 2016**

**RAYMUND ENRIQUEZ LIBORO** was appointed the Privacy Commissioner and Chairman, along with his Deputy Privacy Commissioners Atty. Ivy D. Patdu and Damian Domingo O. Mapa.

**24 August**

The Implementing Rules and Regulations of the Data Privacy Act was promulgated after months of consultation with different stakeholders.

**10 October**

Memorandum Circular No. 1 on Security of Personal Data in Government Agencies and Memorandum Circular No. 2 on Data Sharing Agreements in Government were released.

**21 October**

The NPC was approved as a full member of the International Conference of Data Protection and Privacy Commissioners (ICDPPC).

**2 November**

The Asia Pacific Privacy Authorities (APPA) welcomed the NPC as a full member.

**5-6 December**

The first ever Data Privacy Summit in the Philippines entitled, *Privacy.Gov.PH: Government at the Forefront of Protecting the Filipino in the Digital World* was held at Novotel Manila.

**15 December**

Memorandum Circular No. 3 on Personal Data Breach Management and Memorandum Circular No. 4 on Procedure of the National Privacy Commission were released.



# Public Information and Education

## Online Information and Awareness Campaign

**THE COMMISSION'S** public information and education campaign is handled primarily by its Public Information and Assistance Division (PIAD), which began operations in October of 2016.

### SOCIAL MEDIA

The Commission's social media accounts, namely, @privacy.gov.ph on Facebook and @privacyPH on Twitter, were formally turned over to the Public Information and Assistance Division in November of 2016. Since then, the accounts have been a medium for the Commission to reach the public, posting daily content that revolve around the concepts of privacy in the Philippines — from updates on the Commission and its activities to everyday tips that can protect personal information privacy online.

To do so, weekly content plans were prepared and rigorously edited. The goal: to heighten engagement with the Filipino public online, thus elevating awareness and discourse on data privacy and security. Content buckets such as related news, engagement posts, privacy push, and in review make sure that the materials produced are always new and engaging, while the Division's artists and writers cover events, make illustrations, and write copy to post online.

The accounts are managed in pursuit of the Commission's goal of building a culture of privacy among Filipinos and empowering them to recognize and uphold their data privacy rights. In its first two months, the Facebook page grew in Likes by 219%, while the Twitter page grew in Followers by 68%.

By the end of 2016 and within only two months of social media activity, the Commission had an audience of over five thousand Filipinos online.

### WEBSITE

The Privacy.Gov.PH website redesign began in December of 2016. Materials used in the PrivaGov Summit: Government at the Forefront of Protecting the Filipino in the Digital World were used as basis for the first versions of the new website's knowledge and resource center. Work on the website content also began towards the latter half of the month, when the structure of the website was mapped out and planned.

The website is set to launch in April 2017, with the goal of being a hub for Data Protection Officers of different personal information controllers and processors across the country to register and comply with RA10173, or the Data Privacy Act of 2012.





# Knowledge Materials

## EXTERNAL PUBLICATIONS

The following are the external publications of the Commission:

1. Print Media Advertisement of Memorandum Circular Nos. 1-4
  - a. Philippine Daily Inquirer, 22 December 2016;
  - b. Manila Bulletin, 23 December 2016;
  - c. Philippine Daily Inquirer, 29 December 2016.
2. News Articles
3. Privacy Management Guide Booklet
4. Data Privacy Brochures
5. Social Media Materials
6. Data Privacy Presentations

Supporting documents needed for other functions were created, reviewed and used as needed for conceptualization, consultation, meetings, and related activities. This was to better understand the intended output and usage of as required by the events. Such documents were floor plans, drafts of collaterals and write-ups.

## INTERNAL PUBLICATIONS

The NPC creates awareness and effective communication strategies and materials even within the agency. It is through proper delivery of messages, acknowledgements, and materials that the members of the agency become united as one entity at the forefront of promoting privacy in the Philippines. Thus, the National Privacy Commission Style Guide was created.

The Style Guide was produced in order to present the corporate visual identity of the Commission. The usage of the NPC logo, standard documentation, presentation slide templates and other materials used for internal purposes were explained and cascaded throughout the agency.

The accompanying standard documentations such as paper document, presentation, ID and contact card layouts were created and are now being used by officials and staff. Information within these documents are updated as needed by the agency and its members.

Among the outputs created by the division under documentation are the Style Guide, document templates for letter, memorandum, and policy issuance, contact card, ID, presentation slides, and e-signature. Under support documents are the final looks of presentation slides, tarpaulins, banners, photo wall, stickers, and floor plan layouts, USB design, and proposals of write-ups.





## Events

### PRIVACY.GOV.PH DATA PRIVACY SUMMIT

#### Administrative and Logistics:

The division facilitated and organized all pre-production documents for procurement of materials and equipment needed for the event. The team also conducted ocular inspections and technical meetings with Novotel, photographers and videographers hired for documentation, and the printing company that supplied all printed materials for the event. The committee also organized the kits given to the participants. Included in the kits were the privacy management guide, handouts, press releases, and schedule of programs needed for the two-day summit. The same team also gathered feedback from participants as part of the post-event report done by the division.

#### Tech and Design:

The design team conceptualized and created all visual outputs used for the event, from the presentations of the speakers, audio-visual productions, backdrops, motion graphics and publicities done online. The tech team worked hand-in-hand with the design team, as well as with those hired for photo and video documentation of the event, so that the program may be conducted seamlessly. A team of videographers were tasked to cover all talks of the speakers during the event to be released in social media sites and in the official website of the NPC. Photos and tweets of the speakers were posted on NPC social media accounts to boost online presence and update the followers of the Commission.

#### Press Conference:

Members of the media were invited by Media Relations officers of the NPC to cover the event and to interview Chairman Raymund Enriquez Liboro. Press releases and kits were given to the members of the media. The press conference was also held at Novotel.

### EVENTS ATTENDED

During the month of November, the following events attended by the Commission were: (1) Data Privacy Act Compliance - Disini Event, (2) e-FOI Launch, (3) National Capability Development Summit, and the (4) BPI Briefing.

The events attended during the month of December were the following: (1) Presentation of National Cybersecurity Plan 2022 - DICT Cybersecurity Event and (2) Cybersecurity Awareness Day - Meralco Event.





# Communications Research

## DATA PRIVACY BASELINE SURVEY

As a newly created agency, the National Privacy Commission (NPC) initiated its operations with efficiency and adherence to the vision of the organization. In line with this, the NPC was determined to have policies, programs, projects and activities that truly respond to public needs in terms of data privacy. For the NPC to adopt an evidence-based approach, it contracted the full-research service of a social research firm in December 2016 to conduct a nationwide data privacy baseline survey. The survey is expected to be completed during the second quarter of 2017.

The contract covers survey design, data gathering, processing, analysis, and report writing. The survey will measure: the level of public awareness of data privacy and the National Privacy Commission and its role; the extent to which the public is concerned with protecting their personal information; the level of public trust with public and private organizations in handling personal data; and the extent to which the public practices privacy-enhancing measures.

# Public Assistance

### Fast Numbers

**100%**

The response rate on inquiries sent in via Facebook as of 28 December. The total number of inquiries sent in was **74**.

**48.86%**

Inquiries received via e-mail and acted upon by the NPC. The rest, comprised of other complex services, were in processing as of 28 December. The total number of inquiries sent in was **88**.

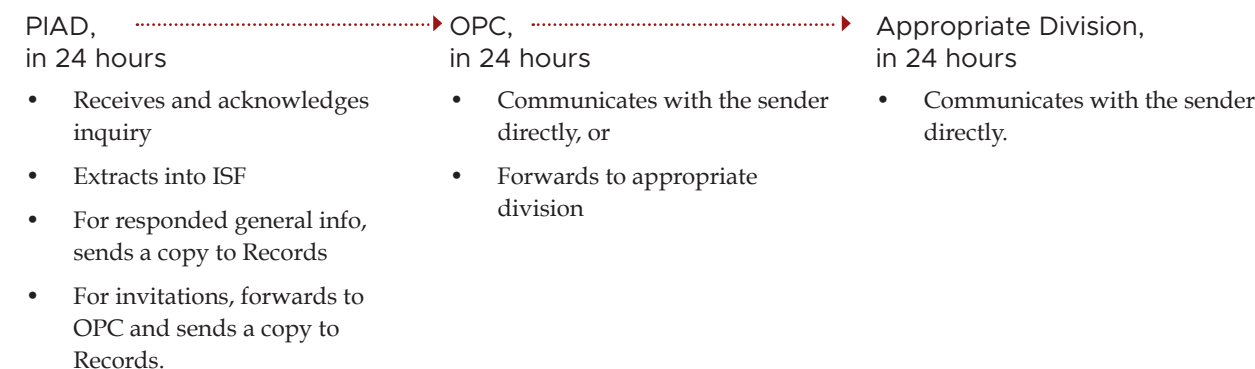
To start the process, the Public Assistance team drafted its internal guidelines in receiving and forwarding inquiries. Various forms were drafted and are currently being used to process every inquiry received from all the platforms in support of the unit's objectives.

1. Inquiry Summary Form;
2. Routing Slip;
3. Inquiry Form; and
4. Filling Complaints Form.

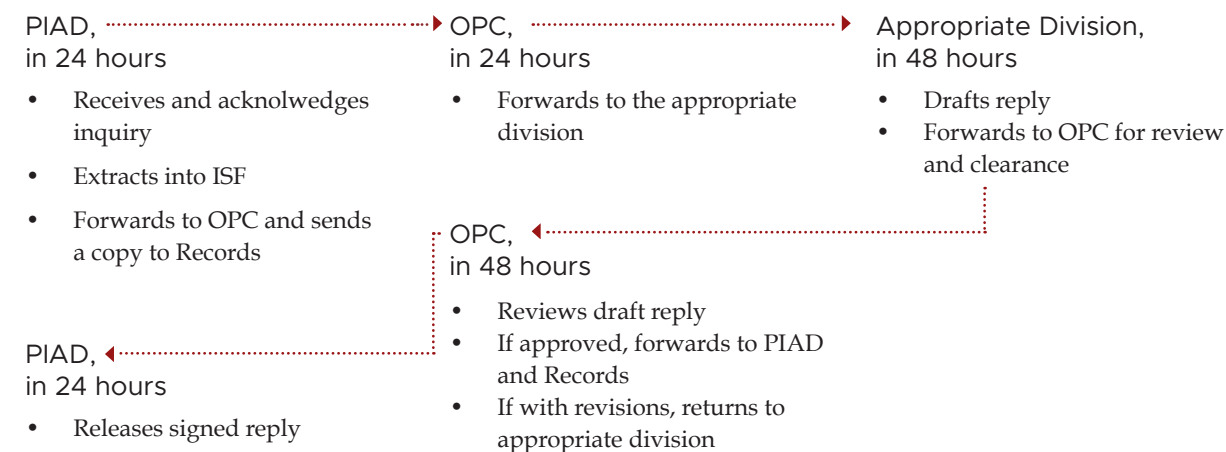
The Public Assistance Team also established [AskPriva](#), the online assistance and inquiry system of the Commission. Full implementation of AskPriva's AI system is set to launch before the end of 2017.

The process on handling inquiries was also established together with the Office of the Privacy Commissioner (OPC) and Records Office. The agreed flow of process is shown below:

## HANDLING GENERAL INQUIRIES



## HANDLING INQUIRIES RELATED TO COMPLAINTS, COMPLIANCE, AND POLICY





# 02 Policy Development and Review

## The Privacy Policy Office

The Privacy Policy Office (PPO) is responsible for coordinating with government regulatory agencies and data privacy regulators in other countries to develop privacy policy standards for the protection of personal information in the government and private sector, and to facilitate cross-border enforcement of data privacy protection. The Office is responsible for the review of data privacy policies, and for the provision of advisory and legal opinions on matters related to privacy concerns.

### POLICY DEVELOPMENT

The Policy Development Division (PDD) developed policies that promoted the protection of personal data in the government and the private sector. The review of the DPA, its IRR, and other issuances for further improvement and amendment was also part of its responsibilities.

### POLICY REVIEW

The Policy Review Division (PRD) prepared the agency's advisory opinions on the amplification and interpretation of the provisions of the DPA, IRR, and other issuances. It reviewed, approved, rejected or required the modification of privacy codes voluntarily adhered to by personal information controllers, which included private dispute resolution mechanisms for complaints against any participating personal information controller.

## Policy Papers

The PPO submitted policy papers on behalf of the Commission on proposed bills that originated from both the House of Representatives and the Senate. The policy papers provided comprehensive discussion and recommendations on particular issues through the lens of personal data protection.

### POLICY PAPER ON BIG DATA

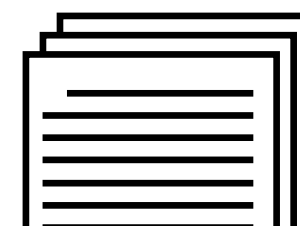
The PPO submitted its comments and proposed revisions to Senate Bill No. 688 and House Bill No. 3056 on the institutionalization of the establishment of a Philippine Big Data Center. Incorporated therein was the lawful processing of personal data with the DPA, its IRR, and the issuances as reference.

### THE RIGHT TO INFORMATION AND THE RIGHT TO PRIVACY

The PPO submitted its comments and proposed revisions to Senate Bill No. 159 and draft consolidated House Bill on the implementation of the people's right to information and the full public disclosure of public documents. Incorporated therein were the Commission's proposed language of bill and the adoption of a single agency for Freedom of Information and Privacy.

## Circulars

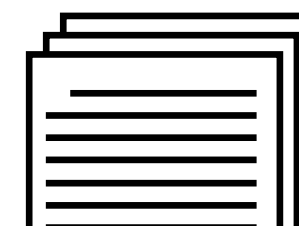
The PPO developed and/or reviewed guidelines that complemented and further explained the provisions of the DPA and its IRR to serve as reference for the government and private sector in their compliance with the law.



*NPC CIRCULAR 16-01:*

### SECURITY OF PERSONAL DATA IN GOVERNMENT

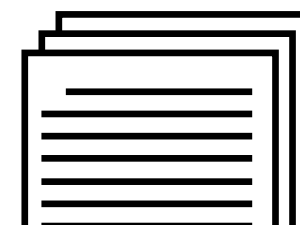
Provided the general obligations of a government agency engaged in the processing of personal data, and guidelines for its secure processing.



*NPC CIRCULAR 16-03:*

### PERSONAL DATA BREACH MANAGEMENT

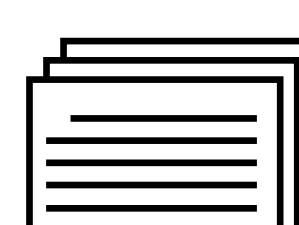
Provided the framework for personal data breach management and the procedure for personal data breach notification to the Commission and affected data subjects, made applicable to both government and private sector.



*NPC CIRCULAR 16-02:*

### DATA SHARING AGREEMENT INVOLVING GOVERNMENT AGENCIES

Provided the guidelines for proper sharing or transfer of personal data under the control of a government agency or custody of a third party by executing a Data Sharing Agreement between concerned parties.



*NPC CIRCULAR 16-04:*

### RULES OF PROCEDURE OF THE NATIONAL PRIVACY COMMISSION

Provided the guidelines for the filing of a complaint, the conduct of investigation and dispute resolution, the rendition of the Commission's decision, and the filing of appeals.



## Legal Opinion

The legal opinions on pressing issues were released. These served as the official statement or stand of the Commission, upon request of an entity or by its own initiative.

### **LEGAL OPINION ON THE EXEMPTION OF LAW ENFORCEMENT AGENCIES FROM THE COVERAGE OF RA 10173 AND ITS IRR WHEN ENFORCING RA 9776**

Upon the request of the Department of Justice - Office of Cybercrime a legal opinion was submitted regarding their claim of exemption from the coverage of the DPA and its IRR, as well as the other law enforcement agencies tasked to implement, enforce and administer the Anti-Child Pornography Act.

## Policy Review

The PPO reviewed, assessed, examined, and verified whether the existing and/or proposed policies of different entities were compliant with the requirements of the DPA, its IRR and other issuances, and formulated recommendations, as necessary.

### **PNP MC NO. 2016-013: INFORMATION ASSURANCE (IA) POLICY**

The Information Assurance Policy was developed by the Philippine National Police (PNP) to ensure the protection of the integrity, availability, authenticity, non-repudiation, and confidentiality of its data and non-disruption of critical services. As requested by the PNP, through its Directorate for Information and Communications Technology Management, the PPO reviewed the said Circular and provided comments and recommendations for its improvement.

## Data Sharing Agreement Review

The PPO evaluated and provided comments on data sharing agreements of government agencies taking into consideration the provisions of the IRR as well as NPC Circular 16-02 relative to data sharing agreements.

### **DSWD'S DATA SHARING AGREEMENT ON LISTAHANAN**

The DSWD, as the lead agency implementing the National Household Targeting System for Poverty Reduction or Listahanan, was mandated to establish a system for identifying and locating poor households in the country and to maintain a system that shall serve as its database by virtue of Executive Order No. 867. Recommendations for the improvement of the said document were forwarded to DSWD upon review.

## Advisory Opinion

Advisory opinions were issued in response to queries from different stakeholders on matters involving the interpretation of the DPA, its IRR and other issuances, and its applicability to particular circumstances. Queries ranged from the definition of terms to the effectivity of the IRR. The official response to five out of the 11 queries forwarded by the Office of the Privacy Commissioner were issued.

## Coordination

### **WITH OTHER GOVERNMENT AGENCIES**

Pursuant to its mandate of formulating privacy standards or requirements to implement the DPA as well as the review of existing or proposed policies with privacy and data protection implications, the PPO represented the NPC in coordination meetings with various regulatory and other government agencies.

A meeting with the PNP was held relative to their Information Assurance Policy vis-à-vis the requirements of the NPC Circular 16-01, with a view of determining adequacy of the policy from a personal data privacy and data protection perspective. The PPO thereafter provided a formal policy review paper detailing the findings and recommendations.

The PPO likewise represented the NPC in a meeting with the representatives of the Bangko Sentral ng Pilipinas (BSP). The main concern was the possible overlap of BSP Circular No. 808 (s. 2013) with the Data Privacy Act (DPA) of 2012. They sought clarification and guidance on several items, i.e. would compliance by banks with BSP's current regulations be enough to similarly comply with the DPA, the potential compliance burden that may stem from the possible duplication of requirements, and the possible confusion and error arising from different standards of reporting.

It has been agreed that both the BSP and the NPC will be reviewing the pertinent overlapping circulars and regulations with the view of harmonizing these for proper compliance of the pertinent stakeholders.

### **WITH STAKEHOLDERS**

Several meetings with different stakeholders from both the government and the private sector, were spearheaded primarily to explain the provisions of the DPA, its IRR, and the issuances of the NPC.

These include a meeting with representatives from the Philippine Stock Exchange (PSE) to discuss its concerns regarding the application of the DPA in relation to the disclosure requirements of the Securities Regulation Code and Securities and Exchange Commission. The PSE raised several issues on the exemption subsequently clarified by PPO.

A meeting was also organized with the Bank of the Philippine Islands (BPI) to discuss their Customer Information Sheet (CIS) and Foreign Account Tax Compliance Act (FATCA) forms in view of the data privacy principles and consent requirement enunciated in the DPA. There was a recommendation that bank forms be revised in order to comply with the provisions of the DPA.



# 03 Automated Processing System Registration

**THE DASCO IS COMPOSED OF** two divisions — the Data Security and Technology Standards Division and the Compliance and Monitoring Division.

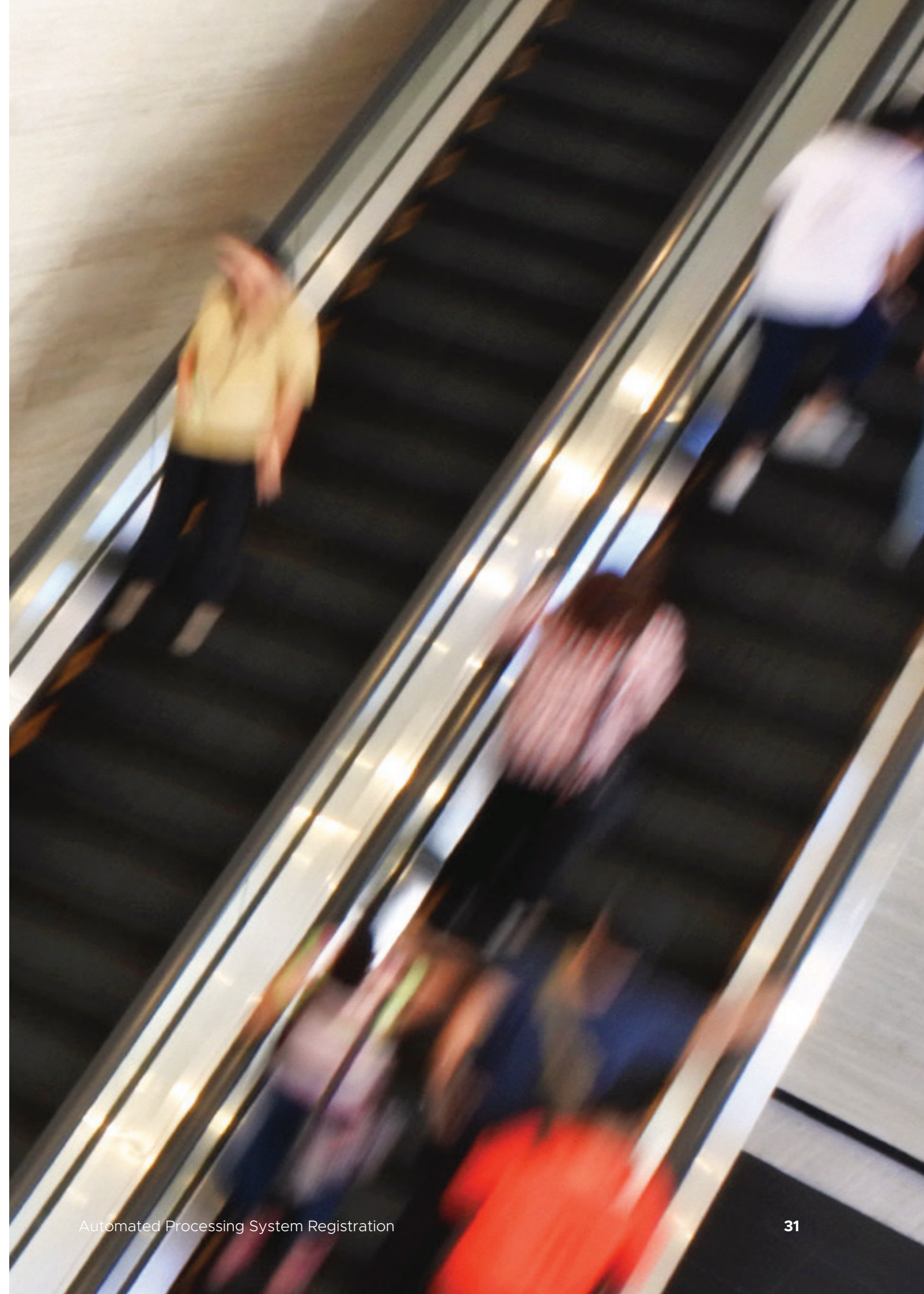
The Data Security and Compliance Office (DASCO) was initially tasked by the Privacy Commissioner to create a system for registering Personal Data Processing Systems. This falls under Section 47 of the Implementing Rules and Regulations of RA 10173, also known as the Data Privacy Act of 2012.

Given the Agency's limited resources, a modular design in system build was used to cater to the immediate needs of stakeholders: registering their Data Protection Officers (DPO) and Personal Information Controllers (PIC).

The registration system aims to provide the Commission with a list of government agencies in all branches (Legislative, Executive and Judiciary), and private corporations or firms that hold personal information. It is set to launch in the first quarter of 2017.

The DASCO ensures that each organization that deals with the processing of Personal and Sensitive Personal Information shall be compliant with the mandates of the Data Privacy Act and subsequent circulars by the National Privacy Commission.

Simultaneously, the DASCO, in collaboration with the Privacy Policy Office, was tasked to create templates on privacy impact and privacy manuals. We look forward to further addressing the needs of stakeholders across both the public and private spheres.





# 04 Stakeholder Coordination

**THE CID FIRST BEGAN WORK** on 22 August 2016. Since then, it has processed a total of 24 formal complaints.

The Complaints and Investigations Division (CID) played a significant role in the drafting and promulgation of the Implementing Rules and Regulations to the Data Privacy Act of 2012 (Republic Act No. 10173), and in the drafting and promulgation of NPC Circular Nos. 16-003 and 16-004. NPC Circular No. 16-003 governs security incident management and data breach reporting procedure for personal information processors and controllers, while NPC Circular No. 16-004 covers the Rules of Procedure for proceedings before the NPC, acting as a quasi-judicial body.

Of the 24 complaints filed and initiated before the NPC in 2016, four cases were deemed submitted for resolution. The CID submitted its investigative reports to the Commission on two of these four cases. Nine other cases were dismissed outright for lack of jurisdiction and endorsed to the proper administrative agencies for the conduct of further proceedings.





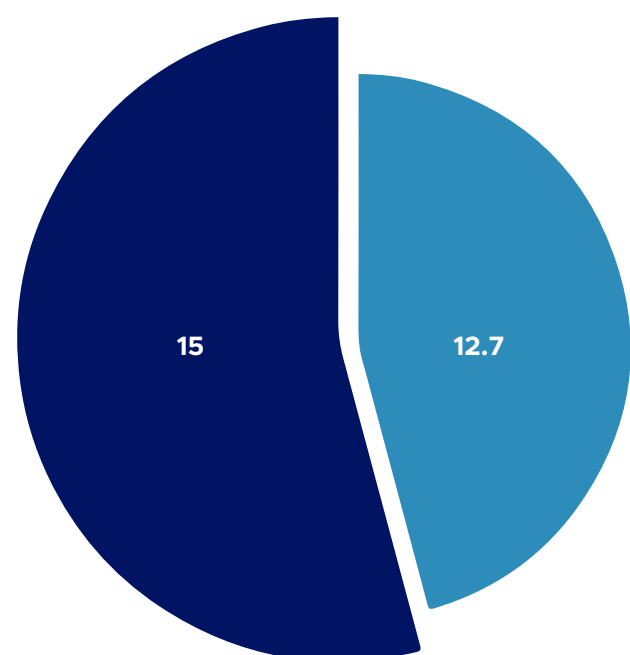
# 05 Internal Management

## Finance

**IN MID-2016**, the National Government appropriated resources from the Special Purpose Fund so that the National Privacy Commission (NPC) may initiate its operations.

Part of the NPC's budget came from the Contingent Fund, which amounts to **Php15,000,000** to be used for Maintenance and Other Operating Expenses. **Php12,712,389**, obtained through the Miscellaneous Personnel Benefits Fund, was allotted for Personnel Services.

This table illustrates the budget allocation according to expense class, expressed in millions of Pesos.



■ Maintenance and Other Operating Expenses (MOOE)  
■ Personnel Services (PS)

Particulars	Allotment	Expenditures	Utilization rate
<b>PS</b>	12,712,389.00	12,624,066.23	99%
<b>MOOE</b>	15,000,000.00	14,410,505.12	96%

This table shows the allotment per Expenditure Class, the actual expenditures, and rate of utilization from July to December of 2016.





# Human Resources

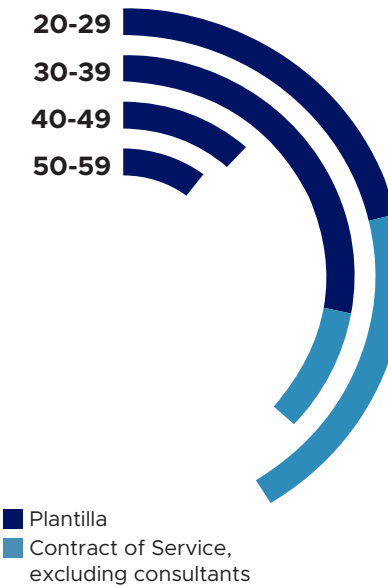
From July to December, the Commission filled 54 permanent positions, with 18 contracts of service and one consultant, which are vital to the NPC as a start-up.

Division	Permanent			Non-Permanent		Total
	Authorized	Filled	Unfilled	COS	Consultant	
OPC	18	13	5	5	0	18
OED	5	0	5	0	0	0
PIAD	7	7	0	7	0	14
DASCO	3	0	3	0	0	0
CMD	14	5	9	0	0	5
DSTSD	6	2	4	0	0	2
LEO	3	0	3	0	0	0
LD	6	2	4	0	0	2
ED	6	1	5	0	0	1
CID	7	2	5	0	0	2
FAO	3	0	3	0	1	1
FPMD	8	6	2	0	0	6
ASD	6	3	3	5	0	8
HRDD	5	4	1	1	0	5
PPO	3	0	3	0	0	0
PDD	12	6	6	0	0	6
PRD	11	3	8	0	0	3
<b>Total</b>	<b>123</b>	<b>54</b>	<b>69</b>	<b>18</b>	<b>1</b>	<b>73</b>

## BY EDUCATIONAL ATTAINMENT

	Plantilla	COS
PHD	2 on-going 3	0
MA/MS	6 on-going 14	3
Juris Doctor	6	2
AB/BS	27	13
Post-HS	1	1
High School	3	0

## BY AGE



## BY SEX





**STAFF PER DIVISION**

**Office of the Privacy Commissioner**

Privacy Commissioner and Chairman	Raymund Enriquez Liboro
Deputy Privacy Commissioners	Damian Domingo O. Mapa Atty. Ivy D. Patdu
Head Executive Asssistant	Supit, Marilou M.
Executive Assistant IV	Cagurangan, Rachele Mae O.
Executive Assistant III	Ragsag, Jonathan Rudolph Y.
Executive Assistant III	Pagua, Robert S.
Senior Administrative Assistant V	Espiritu, Rojo E.
Senior Administrative Assistant III	Lagrama, Mark Jason P.
Administrative Assistant I	Langusta, Jona A.
Administrative Aide V	Esguerra, Rodel S.
Administrative Aide IV	Lagarto, Archie S.
Administrative Aide IV	Bolo, Isidro C.

**Public Information and Assistance Division**

Saquido, Michelle Loise C. Information Officer V
Raza, Olivia Khane S. Information Officer IV
Muleta, Rajyl P. Information Technology Officer II
Pangandaman, Mubarak A. Information Technology Officer I
Tavora, Maria Donabella A. Information Officer III
Vizcarra, Joseph U. Information Officer II
Dela Cruz, Angelie T. Information Officer I

**Compliance and Monitoring Division**

Lansigan, Rolando R. Information Technology Officer III
Bocar, Vida Zora G. Attorney IV
Yap, Matthew Joseph H. Information Technology Officer II
Dela Cruz, Conrad D. Information Technology Officer I

**Complaints and Investigation Division**

Acero, Francis Euston R. Attorney V
Gamboa, Aileen K. Legal Assistant II

**Legal Division**

Flores, Reynaldo L. Attorney V
Reblora, Ana Carmela Erika V. Legal Assistant II

**Enforcement Division**

Adame, Dakila B. Legal Assistant II
--

**Policy Development Division**

Villasoto, Ivy Grace T. Attorney V
Chin, Roren Marie M. Development Management Officer IV
Rellosa, Rasielle Rebekah DL. Attorney III
Miranda, Ma. Maristela Z. Development Management Officer III
Datu Tambuyung, Sharifa Aine C. Development Management Officer III
Choong, Dorathy B. Legal Assistant II

**Administrative Services Division**

Verdolaga, Rey A. Senior Administrative Officer
Maglunog, Pilamar A. Administrative Officer V
Manzo, Grace N. Administrative Officer III

**Policy Review Division**

Jacob, Jamael A. Attorney V
Alicando, Krister Shaun Prinz M. Attorney II
Nonoy, Rodaiza DG. Legal Assistant II

**Human Resource Development Division**

Ilagan, Jerome E. Chief Administrative Officer
Medina, Kimberly Ann M. Supervising Administrative Officer
Dela Cruz, Kaye Angelie R. Administrative Officer V
Bongato, Chantal V. Administrative Officer II

**Financial Planning and Management Division**

Martinez, Belma G. Chief Administrative Officer
Leelian, Marilou C. Supervising Administrative Officer
Lorenzo, Teodulo C. Accountant III
De Mesa, Rosanni U. Accountant III
Bautista, Monalisa G. Administrative Officer IV
Abada, Susana O. Administrative Officer IV





**PERSONNEL TRAINING**

**Legal Research and Writing Training / Seminar** 9 November 2016  
 DICT Building, CP Garcia Avenue, Diliman, Quezon City

**12th Philippine Dispute Resolution Center, Incorporated Commercial Arbitration Training Seminar and Advance Course in Commercial Arbitration** 14-18 November 2016  
 McKinley Hill Town Center, Fort Bonifacio, Taguig City

**6th Luzon Convention of Human Resource Development Practicioners** 28-30 November 2016  
 Philippine International Convention Center, Pasay City

**4th Training Workshop on Principles of Good Clinical Practice and Health Research Ethics** 1-2 December 2016  
 University of the Philippines Manila

**NPC MEMBERSHIPS TO INTERNATIONAL ORGANIZATIONS**

**International Conference of Data Protection and Privacy Commissioners** 21 October 2016

**Asia Pacific Privacy Authorities** 29 November - 3 December 2016  
 Manzanillo, Coloma, Mexico



# 06 Setting performance standards

## SOCIETAL GOAL

Inclusive growth and poverty reduction

## SECTOR OUTCOME

Globally competitive and innovative industry and services sectors achieved

## ORGANIZATIONAL OUTCOME

Privacy and data security in information and communications systems supported and enhanced

### REGULATORY AND ENFORCEMENT SERVICES

5

Circulars and Other Issuances on Rules and Regulations

3

Public Information and Education Projects Implemented

12

Coordination Meetings with Private Sector and Government Agencies Representatives

1

Registration System Established

50%

Complaints and Investigations Resolved

72%

Requests for Assistance Addressed

5

Publications

2

International Agreements and Memberships Entered for Cooperation or Coordination



# Challenges and Opportunities

## CHALLENGES

**Scope** – The largest challenge for the NPC is the scope and coverage of the law. For a newly created quasi-judicial agency, enforcing a law and mandate that applies to everyone provides a complex set of challenges.

**Increase in types of personal data collected** – Personal data is no longer limited to personal identifiable information, but also includes browsing history, retail-related and location data that can be used to for profiling. As technology evolves, we expect the types of personal data to increase.

**Evolving threats** – As technology evolves, so do the threats to information privacy; the vectors of attack increase and likewise evolve new forms. Likewise, new developments in artificial intelligence, and the migration to the cloud of various systems brings on its own set of benefits and disadvantages in relation to particular sectors and perspectives.

**Increasing data protection costs** – With evolving technology and threats, the cost implications to PICs increase. Artificial Intelligence (AI), the Internet of Things (IoT), targeted attacks, multi-layer threats and cloud migration contribute to the rise of data security and protection costs and, subsequently, to the company's reputation.

**Limited data privacy awareness** – Awareness about data privacy issues is relatively low for most Filipinos, and creating and developing awareness about it is one of the biggest challenges facing the NPC. Elevating data privacy awareness has to happen on two critical fronts:

- **Data Subjects (DS)** – Given the current societal makeup, the nature of transactions, and the pervasiveness of technologies, virtually everyone is a data subject. Despite this, privacy is not embedded in the Filipino culture. Our extended families, closely knit society and pervasive use of social media means that personal information is readily accessible. People should be made to feel more protective of their personal data as well as their rights as data subjects. Basic knowledge in information security is also valuable for the protection of data.
- **Personal Information Controllers and Processors** – PICs and PIPs as data subjects themselves need to be aware not only of the rights of data subjects, but also their organization's obligations to comply with data privacy and protection laws. On top of this, PICs need to observe and uphold data privacy principles, integrating privacy by design (PBD) in their data processing systems to minimize their exposure risk.

## OPPORTUNITIES

**Eagerness to learn and empowerment of DS, PIPs, PICs** – The public has demonstrated an eagerness to know more about the value of data privacy, how to best protect personal data, and how to comply with the DPA. Providing information about this on a grassroots level is important. The channels are open and many in the private and government sectors are looking to further our objectives. All that is needed is to finalize the program/s, develop the material, and the follow through on implementation.

**Stakeholder Engagement** – Cooperation from regulators, industry associations, organizations, and professionals as well as vendors has already been accomplished. Maintaining this healthy shareholder engagement is key to the success of NPC's programs.

**Increasing traction for issues** – Publicity from data breaches and decisions issued by the NPC places compliance with the DPA in the limelight. High profile cases such as that of COMELEC from 2016 helped fast-track compliance with the law particularly with government agencies. Data breaches such as that of Yahoo also placed data protection in a prominent position and can be used by the NPC to further awareness for data subjects and the private sector.

**Regulatory climate overseas** – Regulators abroad have similar initiatives and have material that we can adapt to further our objectives. This provides a reservoir of content that can be localized to better gain traction within the Philippine context.



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**Atty. Jamael A. Jacob**  
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**Atty. Reynaldo L. Flores**  
**Chief, Legal Division**



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**Chief, Public information and  
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