UNIVERSITY *of the* PHILIPPINES

OFFICE OF THE PRESIDENT

19 February 2018

MEMORANDUM TJH 2018-05

TO : **Vice Presidents**
      Secretary of the University

SUBJECT : **Review of draft submission to register Personal Data Processing Systems with the National Privacy Commission (NPC)**

   Further to my 11 August 2017 memorandum regarding the registration of the University's data processing systems, our Data Protection Officer (DPO) has drafted the attached document for your review. This document is to be submitted to the National Privacy Commission to meet the 08 March 2018 deadline.

   Please email your suggested revisions and comments to Prof. Marcia Ruth Gabriela P. Fernandez dpo@up.edu.ph and UP Information Technology Development Center (UPITDC) Director Dr. Paulo Noel G. Paje pgpaje@up.edu.ph on or before 23 February 2018.

   For information regarding the registration of personal data processing with the NPC, kindly refer to https://privacy.gov.ph/npc-circular-17-01-registration-data-processing-notifications-regarding-automated-decision-making/.

   Our DPO has followed up with the NPC but has yet to receive the access code that will allow her to use the NPC online registration platform. She needs sufficient time to revise the document based on information she will receive from your offices. The document will have to be submitted through registered mail and electronic mail in the event that the access code is not received on time.

   Thank you for your immediate attention to this matter.

TEODORO J. HERBOSA, M.D.
Executive Vice President

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DRAFT

A. name and contact details of the PIC or PIP, head of agency or organization, and DPO;

Personal Information Controller: University of the Philippines System
Address: 2F North Wing Quezon Hall (Admin Building), University Avenue,UP Diliman, Quezon City
1101 Philippines

Head of Organization UP President Danilo L. Concepcion
Email address op@up.edu.ph
Landline Nos. 9280110/ 9283014

Data Protection Officer Marcia Ruth Gabriela P. Fernandez
Email address dpo@up.edu.ph
Landline Nos. 9283014

B. purpose or mandate of the government agency or private entity;

SEC.3. RA 9500 *Purpose of the University.*—As the national university, a public and secular institution of higher learning, and a community of scholars dedicated for the search of truth and knowledge as well as the development of future leaders, the University of the Philippines shall perform its unique and distinctive leadership in higher education and development. The University shall:

(a) Lead in setting academic standards and initiating innovations in teaching, research and faculty development in philosophy, the arts of humanities, the social sciences, the professions and engineering, natural sciences, mathematics and technology, and maintain centers of excellence in such disciplines and professions;

(b) Serve as a graduate university by providing advanced studies and specialization for scholars, scientists, writers, artists and professionals, especially those who serve on the faculty of state and private colleges and universities;

(c) Serve as a research university in a various fields of expertise and specialization by conducting basic and applied research and development , and promoting research in various colleges and universities, and contributing to the dissemination and application of knowledge;

(d) Lead as a public service university by providing various forms of community, public, and volunteer service, as well as scholarly and technical assistance to the government, private sector, and civil society while maintaining its standards of excellence;

(e) Protect and promote the professional and economic rights and welfare of its academic and non-academic personnel;

(f) Provide opportunities for training and learning in leadership, responsible citizenship, and the development of democratic values, institutions and practice through academic and non-academic programs, including sports and the enhancement of nationalism and national identity;

(g)   Serve as a regional and global university in cooperation with international and scientific unions, networks of universities, scholarly and professional associations in the Asia Pacific region and around the world; and

(h)   Provide democratic governance in the University based on collegiality, representation, accountability, transparency and active participation of its constituents, and promote the holding of fora for students, faculty, research, extension and professional staff (REPS), staff, and alumni to discuss non-academic issues affecting the University.

SEC. 5. RA 9500 *Academic Freedom.*—The national university has the right and responsibility to exercise academic freedom.

SEC.6. RA 9500 *Academic Excellence.*—The national university has the responsibility to maintain and enhance its high academic standards in the performance of its functions of instruction, research and extension, and public service.

C. identification of all existing policies relating to data governance, data privacy, and information security, and other documents that provide a general description of privacy and security measures for data protection;

UP is covered by laws applicable to government such as RA 6713 or the Code of Conduct and Ethical Standards for Public Officials and Employees and therefore policies and procedures have been developed in various offices such that University personnel shall as required by law:

"7 (c) … not use or divulge, confidential or classified information officially known to them by reason of their office and not made available to the public, either:
(1) To further their private interests, or give undue advantage to anyone; or
(2) To prejudice the public interest".

Pursuant to the IRR of RA 6713 University personnel are also duty bound to "provide official information, records or documents to any requesting public, except if:

(a) such information, record or document must be kept secret in the interest of national defense or security or the conduct of foreign affairs.
(b) such disclosure would put the life and safety of an individual in imminent danger;
(c) the information, record or document sought falls within the concepts of established privilege or recognized exceptions as may be provided by law or settled policy or jurisprudence;
(d) such information, record or document comprises drafts of decisions, orders, rulings, policy, decisions, memoranda, etc;
(e) it would disclose information of a personal nature where disclosure would constitute a clearly unwarranted invasion of personal privacy;
(f) it would disclose investigatory records complied for law enforcement purposes, or information which if written would be contained in such records or information would (I) interfere with enforcement proceedings, (ii) deprive a person of a right to a fair trial or an impartial adjudication, (iii) disclose the identity of a confidential source and, in the case of a record compiled by a criminal law enforcement authority in the course of a criminal investigation, or by an agency conducting a lawful national security intelligence investigation, confidential information furnished only by the confidential source, or (iv) unjustifiably disclose

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investigative techniques and procedures; or

(g) it would disclose information the premature disclosure of which would (I) in the case of a department, office or agency which agency regulates currencies, securities, commodities, of financial institutions, be likely to lead to significant financial speculation in currencies, securities, or commodities or significantly endanger the stability of any financial institution, or (ii) in the case of any department, office or agency be likely or significantly to frustrate implementation of a proposed official action, except that subparagraph (f) (ii) shall not apply in any instance where the department, office or agency has already disclosed to the public the content or nature of its proposed action, or where the department, office or agency is required by law to make such disclosure on its own initiative prior to taking final official action on such proposal."

U.P. Acceptable Use Policy for Information Technology approved by the UP Board of Regents at its 1165th Meeting on 31 October 2002 . Said policy includes provisions regarding maintaining the confidentiality/privacy of information such as encrypted files, student records, personnel files, records of disciplinary cases, measures for maintaining the integrity, reliability, availability, and efficiency of computer-based information resources. the respective duties of users and network administrators e.g. all members of the University community are duty bound to report suspected violations of the AUP to network administrators and University officials, penalties are provided for among others, uses that violate the right to privacy etc.

While the University processes personal information (student, employee/ personnel information) through ICT, it likewise has paper based processes e.g. UPCAT processing, processing of applications of transferees and shiftees, recommendations for graduation of students from the College concerned up to the Board of Regents, recommendations for personnel actions (appointment, grant of tenure, promotion etc from the unit concerned up to the official/offices with authority over the personnel action, etc. UP retains paper files or scanned/digital copies of the same in various secure locations in order to preserve the confidentiality, integrity and availability of personal data. Only authorized personnel are allowed to access and process electronic and paper documents e.g. transcripts, true copy of grades, and other documents that may be released only to students under the Education Act of 1982, papers and certifications for personnel, health, legal and other confidential records etc. The above documents containing personal information, sensitive personal information, confidential and privileged information may be accessed by third parties only as allowed by applicable laws, rules and regulations, jurisprudence etc.

D. attestation regarding certifications attained by the PIC or PIP, including its relevant personnel, that are related to personal data processing;

Not applicable

E. brief description of data processing system or systems:

1.) name of the system;
2.) purpose or purposes of the processing;
3.) whether processing is being done as a PIC, PIP, or both;
4.) whether the system is outsourced or subcontracted, and if so, the name and contact details of the PIP;
5.) description of the category or categories of data subjects, and their personal data or categories thereof;
6.) recipients or categories of recipients to whom the personal data might be disclosed; and

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7.) whether personal data is transferred outside of the Philippines;

F. notification regarding any automated decision-making operation.

Not applicable

Brief description of University Data Processing Systems

Starting out as a project in 2011, the UP Information Systems, which include the Human Resource Information System, The Financial Management Information System, the Supplies, Procurement, and Campus Management Information System, the Student Academic Information System, and the Executive Information System which make use of Oracle software, form a robust data network that can be accessed anytime, anywhere, as long as internet connectivity is available. These systems which are used by the University as PIC give much-needed support to the administration in making timely decisions for the benefit of the University's stakeholders, as well as for easier data collection about our students, faculty, staff, and alumni.

a. The **Human Resource Information System (HRIS)** is geared toward improving the University's processes relating to human resource (HR) management. With 12,000+ employees, the efficient management of data is unsurprisingly a challenge, more so, a necessity. With the development and implementation of HRIS, HRDOs across UP CUs now have a common and standard platform to record, store, and process human resource information. As a platform now housing such vast volume of data on UP's human resources, HRIS has also become the tool for the University's administration, particularly its HRDOs in improving how HR processes are delivered. Through HRIS, processes covering the following have been made available online:

- Comprehensive management of employee data. This includes position and assignment history, benefits earned and used, leave data, education, training, accomplishments, dependents, SALN, performance evaluations, etc.
- Self-Service: Employees will be able to view and manage their employment data themselves, anytime and anywhere. They will be able to record important and frequently requested information such as publications, creative work, public service and other accomplishments. They can update their education and training as needed.
- Online processes, including the following:
  o Application for Certificate of Employment
  o Application for Authority to Travel
  o Application for Limited Practice of Profession
  o Application for Leave
  o Application for Authority to Fill
- Payroll management.
- Online Performance Evaluation, with consolidation of ratings by office, department, college, etc.
- Management of training programs and internal job openings.
- Generation of reports such as SALN, Personnel Data Sheet, PSIPOP, headcount and other real-time reports.
- Single record reference for personnel with multiple assignments within and outside CU.
- Integration with SAIS
  o Faculty data used in SAIS will come from HRIS. Data from HRIS and SAIS can be combined to produce Faculty Service Records.
  o Data on dependents, for tuition discounts, will come from HRIS.

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- o Data on student employees will come from both systems.
- o Students who graduate and become employees will have their information readily available.

b. The **Financial Management Information System** (FMIS) records, manages, and consolidates the financial data and transactions of the University's Accounting, Budget, and Cash Offices, as well the other offices/units across its Constituent Universities (CUs). FMIS has five (5) modules, namely: Accounts Payables, Accounts Receivables, Cash Management, Fixed Assets, and General Ledger. Unlike HRIS, FMIS is used by only a select group of offices and employees. User credentials and responsibilities are hence only provided to the Accounting Office, Budget Office, and Cash Office personnel of all CUs, and employees from other units/ offices designated as Disbursement Voucher Originators/ Approvers. The Accounting, Budget, and Cash Offices may then use FMIS to:

- Manage journals, budget, allocations and obligations
- Record and manage bank details (e.g. banks, branches, accounts)
- Process receipts, invoices, debit and credit memos, etc
- Manage fixed assets
- Process payment
- Generate reports in real-time, including reports for compliance with external agencies (e.g. BIR, COA)
- Process staff payrolls. The usual course for processing of payroll involves manually creating a bank file and subsequently giving this to Landbank. With the Financial Management Information System (FMIS), the many steps in processing staff payroll is reduced since the bank file will now be system-generated.
- FMIS can generate timely and accurate financial reports, such as daily collections, monthly expenditures, and reports required by government agencies like the COA and BIR, such as the UP 2307 (Certificate of Creditable Tax Withheld at Source); UP 1600 Monthly Remittance Return of Value-Added Tax and Other Percentage Taxes Withheld under RAs 1051, 7649, 8241, 8424 and 9337); and UP 1601E (Monthly Remittance Return of Creditable Income Taxes Withheld [Expanded]). This in turn reduces the time it takes to comply with changes in government mandated forms, codes, and regulations.

On the other hand, DV Originators and Approvers may use the system to prepare and approve DVs. Supervisors may also use the system to generate selected reports.

FMIS integration with SAIS (see SAIS below)

- Student payments will be integrated with FMIS at the GL level. Allocations to various accounts will be made automatically instead of computed manually. The system will cover both assessment and non-assessment fees.
- Student loans will be reflected in both systems.
- Payments to student employees will be reflected in both systems.
- Comprehensive information on Socialized Tuition System, scholarships, and loans.

c. The **Supplies, Procurement, and Campus Management Information System (SPCMIS)** automates the University's processes on the procurement of goods and services, equipment, and infrastructure projects. It covers both Common-Use (Offered by PS-DBM and to be procured outside PS-DBM) and Non-Common-Use Item Categories. Through this automation, UP aims to enable a more efficient

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management of resources at the agency level down to the unit/ office level in every Constituent University (CU). SPCMIS then serves as a platform for projecting and placing items for procurement, processing payment, and tracking the procured items. SPCMIS is composed of three (3) modules: iProcurement, Purchasing, and Inventory. Together, these are aimed at facilitating a more efficient and convenient procurement process, from plotting procurement to managing inventory. Staff from SPMO and/or Budget Offices may be given responsibilities to SPCMIS that allow them to:

- Process requests
- Create orders
- Manage quotations and suppliers
- Identify fund and fund availability
- Manage stocks
- Review inventory

On the other hand, UP employees from other units/ offices designated as requesters or approvers may use SPCMIS to:

- Create and submit requisitions
- Approve requisitions

Constituent Universities may also have their own homegrown systems. An example of this is UP Visayas Miagao Iloilo's **eProcure Information System** which is a system that facilitates the procurement process of the University. Archives all purchase requests up to the procurement of the equipment, common use supplies and other materials that the university needs.

(NOTE: DPO UPS included these as this may include sensitive personal info eg TIN of individual suppliers; for double checking. If not covered by mandatory registration NPC will consider this voluntarily registered)

d. The **Student Academic Information System (SAIS)** is a comprehensive data management system designed to manage student processes and records. It encompasses the entire student lifecycle: from admission, registration, to enrollment to graduation and alumni tracking. The system is capable of obtaining, processing, retrieving, and updating student, faculty, and alumni information, as well as academic master data such as curricula and course information. As one of the core information systems, it is also integrated with other systems, including the Human Resource Information System (HRIS), Financial Management Information System (FMIS), iLib, UPCAT and Socialized Tuition System.

SAIS enables authorized University personnel to
     manage student applications and admissions (non-UPCAT) as well as financial aid and scholarships, generate academic advisement reports such as course checklists, study plans, prerequisite checking,
     tag scholastic delinquencies and ineligibility/ies to enroll,
     generate wait lists for full classes eliminating the need to physically wait in line for slots, course demand data which can be used in determining class offerings, comprehensive student financial records, including detailed calculation of tuition and other fees, payment history, loan balances, refunds, etc.
     evaluate requirements for graduation and
     manage communications with students, faculty, and alumni e.g. sending emails to groups, sending notifications and alerts, etc.

produce timely and accurate consolidated reports for the university, as well as reports organized by Constituent University, College, office, etc. Reports will be easily accessible by authorized personnel.

Aside from enrollment, students can use SAIS for online processes such as application for dropping, application for leave of absence, graduation, etc.

SAIS also integrates student information among UP CUs; this means the Registrar in one CU will be able to view the records of a student in another CU to facilitate cross-registration, transfers, and application for graduate studies.

Access to SAIS modules is limited only to those who exercise functions or duties related to the particular SAIS module.

SAIS is used by UP Baguio, UP Cebu, UP Los Banos, UP Manila, UP Open University (for double checking)

The following data management systems were developed in house and are used in order to manage student processes and records in other CUs: (for double checking Dear DPO's please comment re this)
Computerized Registration System (CRS) UP Diliman
Computer Student Registration System (CSRS) UP Mindanao
Computerized Registration and Information Systems (CRSIS) UP Visayas Miagao, Iloilo

e. The **Executive Information System (EIS)** will consolidate the data from all the core information systems (HRIS, FMIS, SPCMIS, and SAIS) in one data warehouse. The EIS will be able to give access to accurate and real-time information to the University's administrators. From all this data, EIS can generate interactive reports needed for performance evaluation and decision-making. The EIS includes Financial Analytics, the Human Resource Analytics, and Student Information Analytics. It also consolidates information from the Socialized Tuition (ST) System, with an ST Dashboard.

Aside from the five core information systems, the University developed and continues to create homegrown systems (developed in house) designed to address very specific needs that the University has. These homegrown systems include UPCAT Online, SFA Online, Online Donation Form, Office of Alumni Relations page for processing applications for a UP Alumni email

f. UPCAT Online

Applications to the UP College Admission Test can be partly accomplished through the UPCAT Online site. An email address is needed for logging on to the application account and also for receiving notifications regarding the application if the applicant opts to fill up the form online. The UPCAT Form 1 that is accomplished online will be sent to the applicant's email address along with UPCAT Form 2 (Secondary School Record to be filled up by the principal or school head). Both Forms must be printed and signed. When the forms are submitted and requisite fees are paid applicants (including those who submit manually filled up UPCAT Form 1s) are issued test permits. Information contained in the UPCAT Test permit allows the applicant not only to take the UPCAT, but also access the online UPCAT Reviewer.

g. SFA Online

UP created the Student Financial Assistance Online (SFA Online) to streamline the processing of applications from students who wish to obtain student financial assistance. The SFA Online is a web-based program that collects applications and allows matching and packaging of different financial assistance offerings. It collects and consolidates data on household income as well as the socio-economic characteristics of the household of students. Scholarships and Student Affairs units UP use these data to allocate slots and create complementing financial assistance programs for University students. The SFA Online is a platform managed by the UP System Office of Student Financial Assistance (OSFA).

For AY 2017-2018, the SFA Online will cover applications to the following tuition subsidy & financial assistance programs:

Free Tuition 2017

The program provides tuition subsidy to cover 100% tuition of undergraduate students enrolled in UP. Applications are subject to the prioritization directive of the President of the Philippines and availability of Higher Education Support Fund stated in the Joint Memorandum Circular 2017-1a issued by the Commission on Higher Education (CHED) and the Department of Budget & Management (DBM).

Tuition Subsidy for Medical Students

The program grants tuition subsidy to cover 100% tuition of students enrolled in the Doctor of Medicine programs in UP Manila and UP Palo. Tuition Subsidy for Medical Students is governed by Joint Memorandum Circular 2017-4 of CHED and DBM.

Tulong Dunong Grant

The program provides P 12,000 cash allowance per academic year to qualified undergraduate student. The amount is intended to cover the cost of attending college in AY 2017-2018. The implementation of the grant is directed by Joint Memorandum Circular 2017-3 of CHED and DBM.

Socialized Tuition System

UP created the Socialized Tuition System (ST System) to reduce the cost paid by students during enrollment, based on the paying capacity of the household to which a student belongs. The University may waive a portion or the full cost required during enrollment and, in certain cases, grant miscellaneous fee waiver and monthly cash allowance. The program covers undergraduate students, including students enrolled in Law and Medicine. The ST System was approved by the UP Board of Regents on 16 December 2013.

Under the JMCs of the CHED and DBM UP is required to submit the list of beneficiaries along with quarterly reports to the DBM and Congress and to post the list of beneficiaries on its website.

h. UP Online donation form (Give to UP)

Friends of the University are able to pledge or give their donations by filling up the online form. The site also enables the Office of the Vice President for Public Affairs to systematically document the name, email address, telephone/mobile no. (optional) of donors in order to keep track of

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pledges/donations. The online form allows donors to specify whether they are UP students/graduates and if they want to give anonymously (donor information will not be made public).

i. Office of Alumni Relations (OAR) Alumni Registration for UP Alumni email

The OAR website enables alumni to fill up an online form containing among others their most recent UP degree/certificate, date of graduation and birthdate which OAR uses in order to verify that the applicant is a UP graduate and is qualified to be issued a UP Mail alumni email account. OAR, with the consent of the applicant, uses the information supplied by alumni to update the UP Alumni Database and sends information about alumni events through the issued UP alumni email account.

The OAR also processes requests from UP students, personnel and alumni for the contact information (address, email) of UP alumni using information from the UP Alumni database. The requesting party must state a valid reason/purpose for the request and provide a UP ID/ Government Issued ID/UP Alumni ID. This service is offered by OAR pursuant to Sec 3 (h) of the UP Charter which states that among other purposes UP shall:

"(h) Provide democratic governance in the University based on collegiality, representation, accountability, transparency and active participation of its constituents, and promote the holding of fora for students, faculty, research, extension and professional staff (REPS), staff, and alumni to discuss non-academic issues affecting the University".

j. UP Mail (e.g. jpdelacruz@up.edu.ph) is an email service available to all UP students, faculty, and staff. This email service is exclusively provided to UP for free by Google

There are also UP CU's that offer email services to their respective constituencies e.g. UP Diliman Webmail. (Dear DPO's please help me by providing the names of any of your respective email services)

k. The Philippine General Hospital and various Health Service units in different constituent universities have paper based filing systems as well as electronic medical records of UP personnel, dependents and non UP patients.

l. CUs also have homegrown ILib systems through which students and personnel can reserve books online and view their electronic library card to check if there are overdue books, late fines that are outstanding etc. Authorized personnel use the system to tag those who have outstanding accountabilities or issue clearances.

m. Legal offices of the UP System and the Constituent Universities keep paper based and electronic files containing confidential and privileged information.

As stated above, while the University processes personal information (student, employee/ personnel information) through ICT, it likewise has paper based processes e.g. UPCAT processing, processing of applications of transferees and shiftees, recommendations for graduation of students from the College concerned up to the Board of Regents, recommendations for personnel actions (appointment, grant of tenure, promotion etc from the unit concerned up to the official/offices with authority over the personnel action, etc. UP retains paper files or scanned/digital copies of the same in various secure locations in order to preserve the confidentiality, integrity and availability of personal data. Only authorized personnel are allowed to access and process electronic and paper documents e.g. transcripts, true copy of

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grades, and other documents that may be released only to students under the Education Act of 1982, papers and certifications for personnel, health, legal and other confidential records etc. The above documents containing personal and sensitive personal information, confidential and privileged information may be accessed by third parties only as allowed by applicable laws, rules and regulations, jurisprudence etc.

No personal data processed by the University is transferred abroad. The University and its personnel however use cloud storage to store personal information e.g. Google Drive for UP mail users

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