

## PRIVACY NOTICE FOR UNIVERSITY OF THE PHILIPPINES SYSTEM ADMINISTRATION WEBSITES THAT USE CLOUDFLARE AND MATOMO

UP is committed to comply with R.A. 10173, the Philippine Data Privacy Act of 2012 (PDPA), its implementing rules and regulations and the applicable issuances of the National Privacy Commission (NPC), the body tasked with implementing such law. The said law can be viewed via <https://www.officialgazette.gov.ph/2012/08/15/republic-act-no-10173/>

This privacy notice explains in broad terms:

- (1) the purposes for processing your personal data;
- (2) the legal basis/(es) for such processing;
- (3) the measures in place to protect your data privacy; and
- (4) your data privacy rights.

The term *personal data* includes *personal information* and *sensitive personal information* (as these terms are defined in the PDPA). In essence, these are information that identify individuals or information which when put together with other information can be used to identify individuals.

The terms *process* or *processing* refer to any operation, or any set of operations, performed on personal data including the collection, recording, organization, storage, updating or modification, retrieval, consultation, use, consolidation, blocking, erasure or destruction of data.

The terms *UP/University/us/we* refer to the University of the Philippines System Administration offices or any of its officials or authorised personnel that make use of Cloudflare and such offices, officials or authorised personnel that utilise Matomo:

UP Office of Alumni Relations for the UP Alumni website <https://alum.up.edu.ph/>

UP Center for Women's and Gender Studies (CWGS) Website <https://cws.up.edu.ph/>

UP CIFAL Philippines Website <https://cifal.up.edu.ph/>

UP Padayon Public Service Website <https://publicservice.up.edu.ph/>

UP Siklab Website <https://siklab.up.edu.ph/>

Office of the Secretary of the University (OSU) Website <https://osu.up.edu.ph/>

Office of the Vice President for Academic Affairs (OVPAA) Website  
<https://ovpaa.up.edu.ph/>

Media and Public Relations Office Ulat UP website [ulat.up.edu.ph](http://ulat.up.edu.ph) [Home - Ulat UP](#)

Philippine Genome Center Website <https://pgc.up.edu.ph/>

Office of the Vice President for Digitization (OVDPX) website  
<https://ovpdx.up.edu.ph/>

The terms *you/your* refer to persons who visit our websites that use Cloudflare and/or Matomo.

## **PERSONAL DATA WE COLLECT, OUR PURPOSES AND LAWFUL BASES FOR PROCESSING THESE**

When you visit our website/s, servers of Cloudflare, our content delivery network, process your IP address, traffic routing data, system configuration information, and other information about traffic to and from our website.

Our servers automatically collect your IP address, browser make and version, device profile and operating system, date and time of access, title of the page(s) being viewed, URL of the page that was viewed prior to the current page (referrer), the success status of web pages being requested, how long the server took to respond and other similar information about the server as well as any errors encountered.

We use your IP address and associated information for the purpose of detecting and responding to security incidents and personal data breaches. This information is stored in our log files. Please rest assured that such information is only accessible to our system administrators. Personal data that is processed for security and fraud prevention as well as compliance with our legal obligations may be shared with other UP offices, law enforcement agencies and other relevant public authorities pursuant to the requirements of applicable laws, rules and regulations.

If you grant your permission by ticking the checkbox found at the bottom of the home sites of the above webpages, the website analytics software that we use — Matomo analytics sets a unique visitor ID to store details regarding your visit.

We use Matomo in order to comply with the spirit of Rule II of NPC MC 2023-6 [Microsoft Word - Circular\\_16-01Repeal\\_30Nov2023\\_CLEAN\[6083\]](#) which emphasises the importance of privacy by design. For more information, you may wish to visit

Matomo's privacy page [Privacy-Friendly Web Analytics User Privacy Protected | Matomo Analytics](#)

Your data and that of other site visitors that are processed using Matomo are stripped of identifiers (wholly anonymized). We use such wholly anonymized data in aggregate form to optimize our server infrastructure, cope with visitor demand and optimize our website to give you the best experience possible given our available resources. We likewise use the same in order to conduct research for the annual reports of UP offices that use Matomo. Such wholly anonymized data is automatically deleted after twelve (12) months.

**If you do not want us to process your information for this purpose, kindly make sure that the box found at the bottom portion of our landing page remains unchecked or change your browser settings to prevent tracking.**

For more information about opting out of Matomo please refer to [How to Opt-out of Tracking in a Website Using Matomo | University of the Philippines Information Technology Development Center](#).

The University of the Philippines System may also process your personal data in order to establish, exercise, or defend legal claims; fulfill other purposes directly related to the above-stated purposes; and for such other purposes as allowed by the DPA and other applicable laws.

## **RISKS AND HOW UP PROTECTS YOUR PERSONAL DATA**

The processing of personal data (personal and sensitive personal information) carries risks that may involve the confidentiality, integrity, and availability of personal data or the risk that processing will violate the privacy principles and rights of data subjects. UP has put in place reasonable physical (e.g. access control measures such as locks, security personnel, etc.) organizational (e.g. only authorised personnel who have signed the required non-disclosure undertaking and need such personal data to perform their functions are allowed to process such personal data, privacy impact assessments, etc.) and technical measures (e.g. encryption, the conduct of vulnerability and penetration testing and other similar measures) to prevent or mitigate such risks. Kindly note that these measures do not guarantee absolute protection against such risks as when systems are subject to targeted cyberattacks, malware, ransomware, computer viruses, etc. However, UP has also adopted measures in order to deal with security incidents or personal data breaches in compliance with the PDPA and NPC issuances.

Please refer to the Board of Regents approved UP Data Privacy Manual [CERTIFIED TRUE COPY DATA PRIVACY MANUAL 2023 EDITION.pdf \(up.edu.ph\)](#) which includes security incident and breach response procedures (Part 7, pages 35 - 45) and the following forms:

Form 1 UNIVERSITY OF THE PHILIPPINES SYSTEM ADMINISTRATION  
INCIDENT OR BREACH REPORT FORM.docx (up.edu.ph)

Form 2 PRELIMINARY ASSESSMENT FORM FOR SECURITY  
INCIDENTS OR PERSONAL DATA BREACHES (up.edu.ph)

Form 3 Mandatory Notification to NPC.pdf (up.edu.ph)

Form 4 Mandatory Personal Data Breach Notification for Data  
Subjects.docx (up.edu.ph)

Form 5 SECURITY INCIDENT OR PERSONAL DATA BREACH REPORT  
(up.edu.ph)

We remind UP offices, officials and personnel in our various portals, privacy notices and security advisories transmitted by our IT offices to keep the processing of personal data secure by double checking that the UP mail account used for UPs portals and systems has not been compromised by using Have I Been Pwned, using a strong password for such account [2023\\_12\\_04\\_REMINDER - Use Strong Passwords for UP Mail Accounts](#) and [2025\\_06\\_20\\_REMINDER\\_Strong\\_Passwords\\_UPMail](#) keeping all UP account credentials confidential, using when possible more stringent means for multi factor authentication (MFA) for UP mail accounts such as through the use of passkeys or hardware based MFA and not using public, unsecured networks for processing personal data or at least using VPN if use of such unsecured networks is unavoidable and periodically provide other similar advisories as well as trainings.

You have the following rights subject to the conditions and limitations provided under the PDPA and other applicable laws and regulations:

- a. When applicable, the right to access your information subject to the requirement that you are able to provide UP with means for verifying your identity. You may send your subject access request along with such evidence of your identity to the [ICT Support Team ITDC-OVPDx UP System](#).
- b. The right to be informed about the processing of your personal data through, for example, this and other applicable privacy notices.
- c. The right to object to the processing of your personal data, to suspend, withdraw or order the blocking, removal or destruction thereof from our filing system. Kindly note, however, that as mentioned above, there are various instances when the processing of your personal information is necessary for us to comply

with statutory and other regulatory requirements, or is processed using a lawful basis other than consent.

- d. The right to receive, pursuant to a valid decision, damages due to the inaccurate, incomplete, outdated, false, unlawfully obtained, or unauthorized use of personal data, taking into account any violation of your rights and freedoms as a data subject; and
- e. The right to lodge a complaint before the NPC provided that you first exhaust administrative remedies by filing a request with the proper office regarding the processing of your information, or the handling of your requests for access, correction, blocking of the processing of your personal data and the like.

## UPDATES TO THIS PRIVACY NOTICE AND QUERIES REGARDING DATA PRIVACY

We encourage you to visit this site [UP PRIVACY POLICIES - HOMEPAGE](#) from time to time to see any updates regarding this privacy notice. We will alert you regarding changes to this notice through this site.

For queries, comments or suggestions regarding this privacy notice, please contact the University of the Philippines System Data Protection Officer through the following:

a. Via post

c/o the Office of the President  
2F North Wing Quezon Hall  
(Admin Building) University Avenue,  
UP Diliman, Quezon City 1101  
Philippines

b. Through the following landlines

Phone | (632) 89280110; (632) 89818500 loc. 2521

c. Through email

dpo@up.edu.ph