

## **UNIVERSITY OF THE PHILIPPINES SYSTEM ADMINISTRATION CCTV PRIVACY NOTICE**

### **POLICY**

The University of the Philippines System Administration (UPSA) is committed to comply with the Philippine Data Privacy Act of 2012 (DPA) <http://www.officialgazette.gov.ph/2012/08/15/republic-act-no-10173/> in order to uphold your right to data privacy.

The terms *UPSA /University/ our* in this notice refer to the relevant University of the Philippines System Administration offices, officials and authorized personnel. Kindly note that our closed circuit television system (CCTV) signages identify the specific UPSA office that operates the CCTV system in a particular location.

The terms *you/your* apply to an individual whose personal information is processed (seen or monitored, recorded etc.) by an UPSA office's CCTV system.

This privacy notice explains in general terms: (1) the nature, purpose/(s) and extent of the processing of your personal data; (2) the legal basis/(es) for such processing; (3) the risks associated with such processing and the measures that UPSA has put in place to protect your data privacy rights; and (4) your data privacy rights and how you may exercise the same.

Personal data refers to personal and sensitive personal information as defined under the DPA.

UPSA shall comply with the National Privacy Commission's Circular 2024-02 and other applicable laws, rules, regulations and issuances in operating its CCTVs.

### **OUR PURPOSES FOR PROCESSING PERSONAL DATA**

UPSA processes personal data (images or visual information) collected, monitored and/or recorded through CCTV for the following purposes:

- a. for the safety of persons authorized to be in UPSA premises and to secure its premises, properties as well as its processes or operations;
- b. preventing, detecting and reporting crimes as well as other security incidents;
- c. preventing, detecting and investigating violations of University policies, applicable rules and regulations; and
- d. for all such other purposes as may be allowed by the DPA.

### **OUR LAWFUL BASIS/ES FOR PROCESSING PERSONAL DATA**

UPSA offices have legitimate interests in keeping such persons safe and securing its premises, properties and processes conducted in such premises.

The University likewise has the legal obligation to process personal data to exercise academic freedom by implementing applicable University policies, rules and regulations.

UPSA may disclose personal information contained in CCTV footage pursuant to the legitimate interests of third persons as provided in 12 f of the DPA or in order to comply with legal obligations and valid orders of public authorities.

Sensitive personal information in CCTV recordings may be processed when necessary for the protection of lawful rights and interests of natural or legal persons in court proceedings, or the establishment, exercise or defense of legal claims.

#### RETENTION PERIOD

In the event UPSA offices record CCTV footage, these are kept for a period of thirty (30) days and thereafter securely deleted except as required or allowed by applicable laws, rules and regulations.

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

The processing by UPSA of your personal data 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. UPSA manages such risks through among others, encryption of recorded footage, seeing to it that only authorized persons have access to CCTV systems and recordings and that such recordings are securely kept for the abovementioned retention period except as required or allowed by applicable laws, rules and regulations. Please note that these measures do not guarantee absolute protection against such risks as when systems are subject to targeted cyber attacks, etc. However, the University has also adopted measures in order to deal with security incidents or personal data breaches in compliance with the DPA and National Privacy Commission (NPC) issuances. You may wish to 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 provisions on control measures as well as security incident and breach response procedures (Part 7) [CERTIFIED TRUE COPY DATA PRIVACY MANUAL 2023 EDITION.pdf](#).

#### DATA SUBJECT RIGHTS AND HOW YOU MAY EXERCISE THE SAME

Under the DPA, data subjects have the right to information, access, correction, deletion, to complain before the National Privacy Commission provided you first exhaust administrative remedies and 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, considering any violation of your rights and freedoms as a data subject.

In case you wish to exercise your right to access your personal data or if you are a third party with a lawful basis under the DPA to access personal data, kindly provide the relevant UPSA office or offices whose CCTV system may have recorded the relevant personal data with the date and time, place, the purpose/s and lawful basis/es for the request as well as any information that would help the UPSA office identify you. You must also provide your UP ID or a valid government issued ID card (GIID) for identity verification purposes. If you are exercising such right to access through a representative s/he must provide a letter of authorization, your UP ID or GIID and your representative's GIID. The concerned UPSA offices shall also ask you to execute a non disclosure undertaking and is authorized to require you to pay for reasonable costs or expenses incurred if any in providing you access.

You may also directly get in touch with the relevant UPSA office(s) that may have processed your personal data through CCTV for any queries or feedback relating to such CCTV processing.

We encourage you to visit this site from time to time to see any further updates regarding this privacy notice. We will alert you regarding changes to this notice through this site.

For queries, concerns, comments or suggestions regarding this UPSA privacy notice you may 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) 9280110; (632) 9818500 loc. 2521

c. Through email

dpo@up.edu.ph