

UNIVERSITY OF THE PHILIPPINES (UP) PRIVACY NOTICE FOR THE CLIENT SATISFACTION MEASUREMENT (CSM) PURSUANT TO THE PROVISIONS OF THE EASE OF DOING BUSINESS AND EFFICIENT GOVERNMENT SERVICE DELIVERY ACT (R.A. 11032), ITS IMPLEMENTING RULES AND REGULATIONS AND APPLICABLE ANTI RED TAPE AUTHORITY ISSUANCES

The University of the Philippines is committed to comply with the requirements of the Ease of Doing Business and Efficient Government Service Delivery Act (RA 11032) <https://www.officialgazette.gov.ph/2018/05/28/republic-act-no-11032/> as well as the issuances of the [Anti-Red Tape Authority](#), the government body tasked with implementing the provisions of such law including [MC-2023-05 Amendment-to-CSM-1-1.pdf](#) which allows UP to revise the ARTA Client Satisfaction Measurement (CSM) form in order among others to uphold the right to data privacy of UPs clients who may wish to answer and submit the CSM online [UPSA Client Satisfaction Measurement Survey](#) or via paper based means through the public complaints assistance desk in UP offices pursuant to the applicable provisions of the Philippine Data Privacy Act (PDPA) <https://www.officialgazette.gov.ph/2012/08/15/republic-act-no-1017> [Microsoft Word - the law.docx](#), its Implementing Rules and Regulations (IRR) <https://www.officialgazette.gov.ph/2012/08/15/republic-act-no-10173/> and National Privacy Commission issuances [Advisories & Circulars - National Privacy Commission](#) [National Privacy Commission](#).

This notice explains in general terms, the purpose and legal bases for the processing of the personal data done by UP through the CSM in order to comply with RA 11032 and the related ARTA issuances.

The term University of the Philippines/UP/University/us/our refers to the University of the Philippines System and Constituent University offices, authorized officials and personnel.

The term government service as defined in RA 11032 and its IRR means the process or transaction between applicants or requesting parties and government offices or agencies involving applications for any privilege, right, reward, license, clearance, permit or authorization, concession, or for any modification, renewal or extension of the enumerated applications or request, which are acted upon in the ordinary course of business of the agency or office concerned. This includes frontline services enrolled in the existing Citizen's Charter (whether or not related to business), corresponding backend/support services and regulatory functions related to permitting, licensing and issuance of a privilege, right, reward, clearance, authorization or concession.

The term you/your refers to natural persons (the PDPA does not apply to juridical persons) who avail of the services of UP for and in their behalf or as the duly authorized representative of another natural or juridical person and who provide your name, email address or phone number or such other combination of information in the CSM and or other information possessed by the University that would enable it to identify you as a client of UP for a government transaction as defined below.

Note that personal information as defined in the PDPA includes information which when put together with other information may be used to identify an individual. Although the client satisfaction (CSM) form does not require you to provide your name and other personal information and as stated below we edited the instrument to further prevent re identification of respondents or participants, answering some items (date of transaction and government service availed of) may lead you to be identifiable such that UP is duty bound to comply with PDPA requirements including providing this privacy notice to UP clients.

The term personal data refers to personal information and sensitive personal information as defined in the PDPA. In some instances the information you provide e.g. kind of service availed of or UP office through which the RCS was accomplished may disclose sensitive personal information about you such as information about your education (e.g. UPCAT application) or information about your health etc.

PERSONAL DATA COLLECTED FROM YOU AND OUR PURPOSES FOR PROCESSING YOUR INFORMATION

After you complete your transaction with UP, we request you to voluntarily fill up a client satisfaction measurement (CSM) form. You may opt to answer or not answer the online [UPSA Client Satisfaction Measurement Survey](#) or paper based form in English or Filipino.

You may wish to view the original ARTA CSM form which is Annex A of MC 2022-05 <https://arta.gov.ph/wp-content/uploads/2022/09/MC-2022-05-GUIDELINES-ON-THE-IMPLEMENTATION-OF-THE-HARMONIZED-CLIENT-SATISFACTION-MEASUREMENT.pdf>.

Pursuant to ARTA MC 2023-05 https://arta.gov.ph/wp-content/uploads/2023/06/MC-2023-05_Amendment-to-CSM-1-1.pdf, in order to uphold your right to data privacy and to encourage you to provide frank answers and inputs through the CSM we have modified the ARTA CSM form the items sex assigned at birth, age and region by giving you the option not to answer the same and in the case of age instead of your exact age, the drop down menu mentions ranges

as well as the choice prefer not to say. You have the option to provide us with your email address or phone number. On the other hand, we recommend that you do not do so especially if your email address is not secured using multi factor authentication for your protection. You may also refrain from providing us your email address in order to see to it that your responses will not be attributable or traceable to you.

While you have the option not to answer the items pertaining to personal information in the CSM, we encourage you to consider giving us your answers to the questions regarding the citizens charter and service quality dimensions in order for us to be able to improve our compliance with RA 11032, RA 6713 as well as other laws and issuances which implement Sec. 1 Art. IX of the 1987 Constitution which states that *Public office is a public trust. Public officers and employees must, at all times, be accountable to the people, serve them with utmost responsibility, integrity, loyalty, and efficiency; act with patriotism and justice, and lead modest lives.*

We process your personal information pursuant to our legal obligation pursuant to RA 11032, its IRR and applicable ARTA issuances including specifically [MC-2023-05 Amendment-to-CSM-1-1.pdf](#). We may use the contact information you provide us in order for us to effectively communicate with you regarding your responses in the CSM including any suggestions you made in such form in order for us to improve on service delivery.

UP conducts research on stored, previously processed, de-identified data in order to comply with its legal obligations including its right and responsibility to exercise academic freedom under the 1987 Constitution and the UP Charter. UP as a research university must conduct scientific research in order to produce demographic information and statistics in order among others to assess its adherence to its Charter and applicable laws, rules and regulations and to continually improve service delivery. Kindly note that we also have a legal obligation to provide a report to the ARTA regarding the CSM results (see 4.6 to 4.8 of [MC-2022-05-GUIDELINES-ON-THE-IMPLEMENTATION-OF-THE-HARMONIZED-CLIENT-SATISFACTION-MEASUREMENT.pdf](#)).

Before any research is conducted by UP, so that we will be able to comply with our ethical obligations and uphold your right to privacy, duly authorized UP personnel will remove identifiers from the applicable dataset such that UP's researcher or research teams who will perform operations on such dataset will not be able to associate your data with you. The research results will only include aggregate or statistical data and general demographic information that does not identify you and any other data subjects. Kindly note that Sec. 16.C.2 of Memorandum Circular 2023-4 issued by the National Privacy Commission provides that: The conduct of research where the end results will

be anonymized and will only disclose the general demographic of the research subjects does not require the consent of the data subject. On the other hand, if research will make use of identifiable personal data, when so required by applicable laws, rules and or ethical guidelines such as the guidelines issued by the Philippine Health Research Ethics Board pursuant to the Philippine National Health Research System Act, we will first obtain the proper ethics clearance as well as your informed consent prior to the conduct of such research.

The University will disclose or share your relevant personal and/or sensitive personal information to third parties when allowed or required by law such as the same is required by public authorities acting in compliance with their mandate such as the ARTA.

DATA PRIVACY RISKS AND HOW UP PROTECTS YOUR PERSONAL DATA

The processing by UP 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. 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, periodic privacy impact assessments etc.) and technical measures (e.g. use of CDN, encryption, multi factor authentication for UP mail and portals, 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 DPA and National Privacy Commission (NPC) issuances. See the Board of Regents approved UP Data Privacy Manual https://privacy.up.edu.ph/instructions-and-guides/CERTIFIED%20TRUE%20COPY_DATA%20PRIVACY%20MANUAL%202023%20EDITION.pdf which includes security incident and breach response procedures (Part 7) and the following forms:

Form 1 Security Incident or Data Breach Report Form

<https://privacy.up.edu.ph/downloadable-forms/UNIVERSITY%20OF%20THE%20PHILIPPINES%20SYSTEM%20ADMINISTRATION%20INCIDENT%20OR%20BREACH%20REPORT%20FORM.docx.pdf>;

Form 2 Preliminary Assessment Form

<https://privacy.up.edu.ph/downloadable-forms/PRELIMINARY%20ASSESSMENT%20FORM%20FOR%20SECURITY%20INCIDENTS%20OR%20PERSONAL%20DATA%20BREACHES.pdf>;

Form 3 Mandatory Personal Data Breach Notification to the National Privacy Commission

<https://privacy.up.edu.ph/downloadable-forms/Mandatory%20Notification%20to%20NPC.pdf>

Form 4 Mandatory Personal Data Breach Notification for Data Subjects

<https://privacy.up.edu.ph/downloadable-forms/Mandatory%20Personal%20Data%20Breach%20Notification%20for%20Data%20Subjects.docx.pdf>

Form 5 Security Incident or Personal Data Breach Report Form

<https://privacy.up.edu.ph/downloadable-forms/SECURITY%20INCIDENT%20OR%20PERSONAL%20DATA%20BREACH%20REPORT.pdf>

We remind you in our various portals and privacy notices to keep your personal data secure by double checking that the email account you will be using or are using for UP portals has not been compromised by using Have I Been Pwned, using a strong password for such account <https://itdc.up.edu.ph/about/advisories/2023%2012%2004%20REMINDER%20-%20Use%20Strong%20Passwords%20for%20UP%20Mail%20Accounts.pdf>, when possible activating two factor authentication for your personal email accounts or if you are a UP constituent, that you must use your UP email account for UP portals and communications with UP as required by UP memos [MEMO TJH 2021-10] Reminder that faculty and students must use UP Mail for official correspondence and data privacy and security measures required for sending attachments and sharing G.pdf not using public, unsecured networks for submitting personal data or at least using VPN if use of such unsecured networks is unavoidable and keeping all UP account credentials confidential.

ACCESS TO AND CORRECTION OF YOUR PERSONAL AND SENSITIVE PERSONAL INFORMATION AND YOUR RIGHTS UNDER THE DPA

In the event you provided UP with your personal data through the CSM, you have the following rights under the PDPA:

- a. The right to access personal data being processed by UP about you.
- b. The correction of your personal data. UP requires you to provide correct information. In the event that your information needs to be updated please get in touch with the proper University office for the correction of your personal information ie the Office of the Vice President for Administration for the online CSM of the UP System Administration (UPSA) or relevant UP office to which you submitted your online or paper based CSM.

- c. The right to be informed about the processing of your personal data through, for example, this and other applicable privacy notices.
- d. 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, there are various instances when the processing of personal data you have provided to us is necessary for us to comply with UP's mandate, statutory and regulatory requirements, or is processed using a lawful basis other than consent.
- e. 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
- f. The right to lodge a complaint before the National Privacy Commission provided that you first exhaust administrative remedies by filing a request with the proper offices and/or a complaint with the proper DPO through the email address indicated below 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.

In order for UP to see to it that your personal data is disclosed only to you, concerned UP offices will require the presentation of your government issued ID card (GIID) and or other documents that will enable UP to verify and confirm your identity. In case you process or request documents through a representative, in order to protect your privacy, UP requires you to provide a letter of authorization specifying the purpose for the request of documents or the processing of information, and your valid government-issued ID (GIID), as well as the valid GIID of your representative.

QUERIES REGARDING DATA PRIVACY AND INPUTS FOR THIS SYSTEMWIDE PRIVACY NOTICE

We encourage you to visit this site from time to time to see any updates regarding this Privacy Notice.

For queries, comments or suggestions regarding this Systemwide privacy notice as well as data privacy queries for ARTA related processing by the UP System Administration (UPSA) 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

b. Through the following landlines

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

c. Through email

dpo@up.edu.ph

If you have any Data Privacy queries or concerns as it related to CU ARTA processing kindly contact the relevant UP CU Data Protection Officer through the following:

1. Via post
2. Through the following landlines
3. Through email

UP Diliman

Post: Lower Ground Floor, PHIVOLCS Building.
C.P. Garcia Avenue
Diliman, Quezon City 1101

Landline: 8255-3561

Email: dpo.updiliman@up.edu.ph

UP Los Baños

Post: Office of the University Registrar, G/F CAS Annex I Building, UP Los Baños, College 4031, Laguna, Philippines

Landlines: (049) 536-2553 / (049) 536-2426

Email: dpo.uplb@up.edu.ph

UP Manila

Post: 3/F Information Technology Center, Joaquin Gonzales Compound,
University of the Philippines Manila, Padre Faura St., Ermita, Manila

Landline: +63 (2) 509-1003; (PGH) 554-8400

Email: dpo.upmanila@up.edu.ph

UP Visayas

Post: c/o Office of the University Registrar
New Administration Building,
University of the Philippines Visayas
5023 Miag-ao, Iloilo

Landline: (033) 315-9631 or 315-9632 and local numbers 191-192

Email: dpo.upvisayas@up.edu.ph

UP Open University

Post: 2/F UP Open University Main Building
UP Open University Los Banos 4031 Laguna

Landlines: (049) 536-6001 to 006 local 299

Email: dpo.upou@up.edu.ph

UP Mindanao

Post: c/o Office of the Chancellor
University of the Philippines Mindanao
Barangay Mintal, Davao City 8022

Landline: (082) 293-0310

Email: dataprotection.upmindanao@up.edu.ph

UP Baguio

Post: Office of the University Registrar, UP Baguio, Gov. Pack Road, Baguio City
2600

Landline: +63 (74) 442-5592

Email: dpo.upbaguio@up.edu.ph

UP Cebu

Post: Room 242, Arts and Science building, UP Cebu Lahug Campus

Landline: +63 (32) 233-8203 loc 202

Email: dpo.upcebu@up.edu.ph