

# Security Measures & Registration of Data Processing Systems

**Dr. Rolando R. Lansigan**

**Chief, Compliance and Monitoring Division**

# SECURITY MEASURES

---

PROPERTY OF THE NATIONAL PRIVACY COMMISSION



---

**1**

Technical

**2**

Organisational – other  
measures

## Encryption

To what standard? (cost Vs benefit)

All devices or just some?

## Backups

Secure: encrypted tapes | cloud-provider

Auditable process

## Passwords

Enforced strength and updates?

## Access control

Who decides permissions and privileges ('need to know')?

## Sharing data

Technical solutions – e.g. via email; portals

## Remote access

How delivered securely?

## System testing & maintenance

Who has access, to what (System Administrators)

Live or dummy data?

Permit Bring Your Own Device?

Firewalls / Anti-virus / Spam filters

## Secure Office Storage

For removable devices and hardcopy information

Identifying marks?

Locked print?

Kensington locks?

Offsite?

## Remote working

Secure both hardcopies and devices when in transit.

Kept out of sight: in transit | at home.

Lockable pedestals | Kensington locks?

## Building access control

Secure premises – CCTV | locked windows | perimeter

Locked CCTV room | server room

ID badges, supervised visitors | contractors

## Secure disposal

Shredding of hardcopies

Beyond use | Reuse | Resale

## Policy, procedures, guidance & training

Eliminate ambiguities

Clearly communicated, readily accessible and understood

## Human Resources Procurement (and contracts)

Explicit roles and responsibilities in Job Descriptions and Terms of Reference

i.e. outsourced services like IT and software

Terms and Conditions: confidentiality clauses

Due diligence

Auditing and monitoring

Clear expectations | reporting lines

Compliant contract Terms and Conditions:

- Act on your instructions
- Equivalent security

Disciplinary process

Training records

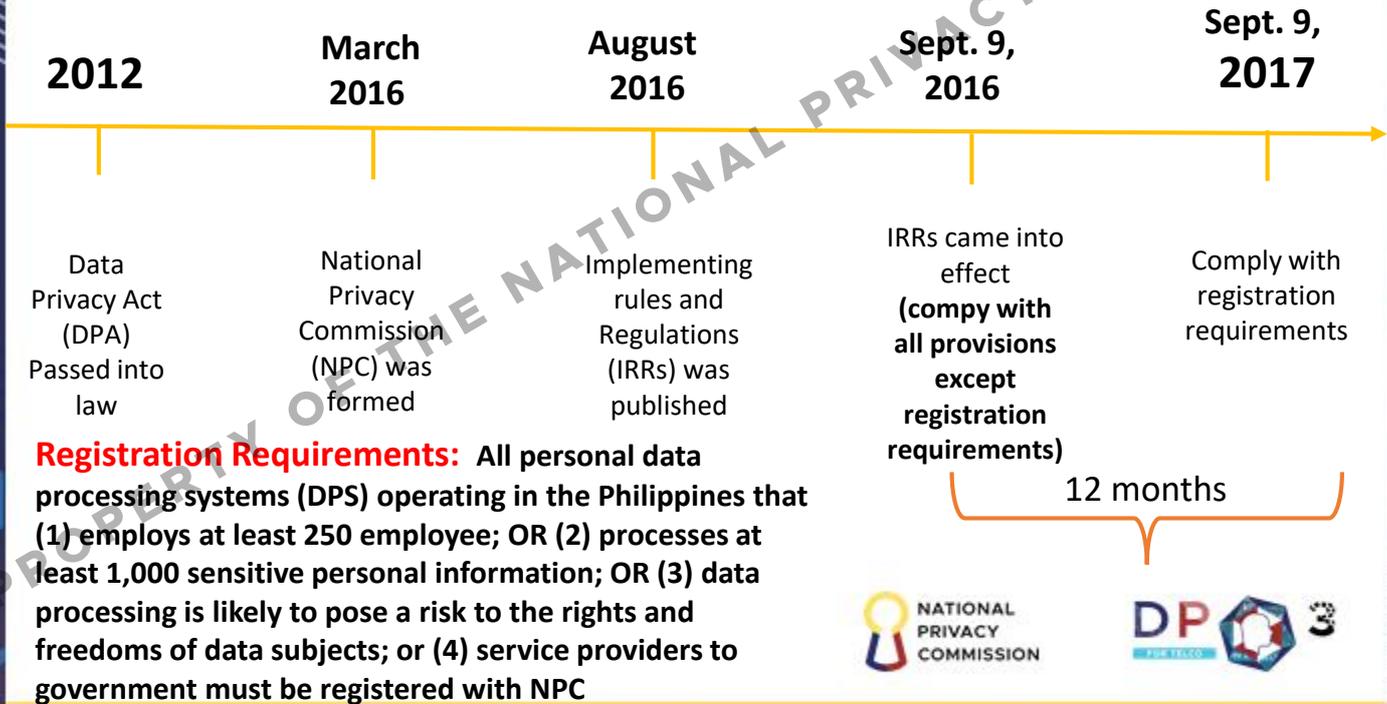
# REGISTRATION OF DATA PROCESSING SYSTEMS

---

PROPERTY OF THE NATIONAL PRIVACY COMMISSION



# Timeline of DPA Law and IRRs passed to Organization's Compliance



# Register with the NPC (Legal Basis: Sec. 24, IRR 33 and 46-49)

## COMPLIANT

## NON-COMPLIANT

Register with the NPC	Non-registration with the NPC
<ul style="list-style-type: none"><li><input type="checkbox"/> Registration with the NPC is up-to-date and contains all necessary compliance documentation</li><li><input type="checkbox"/> Registration of all automated processing operations that have legal effect on the data subject</li><li><input type="checkbox"/> Annual report summarizing documented security incidents and personal data breaches</li><li><input type="checkbox"/> Service providers are also registered</li></ul>	<ul style="list-style-type: none"><li><input type="checkbox"/> No registration (must be renewed annually)</li><li><input type="checkbox"/> Out-of-date registration (must be updated within three months of any change)</li><li><input type="checkbox"/> Non-reporting to NPC of documented security incidents and personal data breaches</li></ul>

# Who should register?

---

Personal Information Controllers and Personal Information Processors who:

- employ more than 250 persons
- process sensitive personal information of at least 1,000 individuals
- belong to sectors identified by the NPC where:
  - the processing carried out is likely to pose a risk to the rights and freedoms of data subjects, and
  - the processing is not occasional
- are service providers to government.



## Section 47. Registration of Personal Data Processing Systems.

---

The personal information controller or personal information processor that employs fewer than two hundred fifty (250) persons shall not be required to register unless the processing it carries out is likely to pose a risk to the rights and freedoms of data subjects, the processing is not occasional, or the processing includes sensitive personal information of at least one thousand (1,000) individuals.

# Cont... Registration

---

a. The contents of registration shall include:

1. The name and address of the personal information controller or personal information processor, and of its representative, if any, including their contact details;

2. The purpose or purposes of the processing, and whether processing is being done under an outsourcing or subcontracting agreement;

3. A description of the category or categories of data subjects, and of the data or categories of data relating to them;

4. The recipients or categories of recipients to whom the data might be disclosed;

5. Proposed transfers of personal data outside the Philippines;



# Cont... Registration

---

6. A general description of privacy and security measures for data protection;
  7. Brief description of the data processing system;
  8. Copy of all policies relating to data governance, data privacy, and information security;
  9. Attestation to all certifications attained that are related to information and communications processing; and
  10. Name and contact details of the compliance or data protection officer, which shall immediately be updated in case of changes.
- b. The procedure for registration shall be in accordance with these Rules and other issuances of the Commission.

# Phases of Registration

---

Phase ONE –

Phase TWO -





Republic of the Philippines  
National Privacy Commission



REGISTRATION OF DATA PROCESSING SYSTEM

DATA PROTECTION OFFICER – DPO

Note: The personal information submitted herein shall be used for the initial phase of the Data Processing System Online Registration and supporting documents should be attached along with this form. Once this form has been validated by the NPC, you will be given an access code via email and SMS to continue with your registration with the online system. You may find the list of supporting documents in our guidelines forwarded to you via email and posted in our website.

PERSONAL INFORMATION CONTROLLER

NAME OF THE ORGANIZATION \_\_\_\_\_

WEBSITE (URL) \_\_\_\_\_ EMAIL \_\_\_\_\_

COMPANY ADDRESS \_\_\_\_\_ TEL. NO. \_\_\_\_\_

HEAD OF THE ORGANIZATION \_\_\_\_\_

LAST NAME \_\_\_\_\_ EMAIL \_\_\_\_\_

FIRST NAME \_\_\_\_\_ TEL. NO. \_\_\_\_\_

MIDDLE INITIAL \_\_\_\_\_

OFFICIAL DESIGNATION (CEO/PRESIDENT) \_\_\_\_\_

DATA PROTECTION OFFICER \_\_\_\_\_

LAST NAME \_\_\_\_\_ EMAIL \_\_\_\_\_

FIRST NAME \_\_\_\_\_ TEL. NO. \_\_\_\_\_

MIDDLE INITIAL \_\_\_\_\_ MOBILE NO. \_\_\_\_\_

OFFICIAL DESIGNATION \_\_\_\_\_ STATUS (PERMANENT-TEN?) \_\_\_\_\_

SWORN STATEMENT

I declare under oath that this Registration Form is accomplished by Data Protection Officer, and is a true, correct and complete statement and pursuant to the provision of the pertinent laws, rules and regulations of the Republic of the Philippines. I also authorize the National Privacy Commission to verify/validate the contents stated herein.

\_\_\_\_\_  
Head of Agency  
(Signature over Printed Name)

\_\_\_\_\_  
Data Protection Officer  
(Signature over Printed Name)

SUBSCRIBE and SWORN to before me, this \_\_\_\_\_, who exhibited to me (his/her) Government issued ID No. \_\_\_\_\_  
dated at \_\_\_\_\_ on \_\_\_\_\_.

Notary Public

Doc. No. \_\_\_\_\_  
Page No. \_\_\_\_\_  
Book No. \_\_\_\_\_  
Series of \_\_\_\_\_

\*\*\* TO BE FILLED UP BY NPC-COMPLIANCE AND MONITORING DIVISION \*\*\*

NPC ACCESS CODE		APPROVED BY (SIGNATURE OVER PRINTED NAME)
DATE GIVEN (MMDDYYYY)		





Republic of the Philippines  
National Privacy Commission



REGISTRATION OF DATA PROCESSING SYSTEM

DATA PROTECTION OFFICER – DPO

Note: The personal information submitted herein shall be used for the initial phase of the Data Processing System Online Registration and supporting documents should be attached along with this form. Once this form has been validated by the NPC, you will be given an access code via email and SMS to continue with your registration with the online system. You may find the list of supporting documents in our guidelines (forwarded to you via email and posted in our website).

PERSONAL INFORMATION CONTROLLER

NAME OF THE ORGANIZATION

WEBSITE (URL)

EMAIL

COMPANY ADDRESS

TEL. NO.

HEAD OF THE ORGANIZATION

LAST NAME

EMAIL

FIRST NAME

TEL. NO.

MIDDLE INITIAL

OFFICIAL DESIGNATION (CEO/PRESIDENT)

DATA PROTECTION OFFICER

LAST NAME

EMAIL

FIRST NAME

TEL. NO.

MIDDLE INITIAL

MOBILE NO.

OFFICIAL DESIGNATION

STATUS (PERMANENT- Y/N/T)

# Phase 2 - Registration

---

Process Owner

Name of Data Processing System

Purpose of Processing

Processing as PIP, PIC or both

Outsourced or Sub Contracted

Description of the Category

Recipients or Categories of Recipients to whom the personal data might be disclosed

Personal data is transferred outside of the Philippines?



“Compliance to Data Privacy Act is not a one-shot initiative. It is a discipline and culture that must be embedded on a continuous basis within the organization.”

**CULTURE OF PRIVACY in the**  
**PHILIPPINES**