

**Adamson University  
Office of the President  
Data Privacy Office**

**Effectivity Date: August 1, 2020**

## **Data Privacy Notice**

Adamson University (herein referred to as “Adamson”, “the University”, “we”) collects and processes personal information and sensitive personal information relating to its stakeholders, majority of which are from students - to be able to manage our operations and to provide the needed services of our clients. This Privacy Notice is our way of ensuring our data subjects that our activities involving the collection and/or use of personal data are being performed in accordance with the Data Privacy Act of 2012 (Republic Act No. 10173) and our commitment that we respect individual’s rights to privacy.

### **1) Personal Data We Collect:**

#### **a) Personal Data that Adamson collects (thru this Website):**

- Collected personal information (PI) may include:
- Name
- Year Graduated
- Course/Program
- Home Address
- Contact Details
- Job Details
- Proof of identity
- Photographs
- Email Address

**Some sensitive personal information (SPI) collected thru this website may include:**

- Age
- Gender
- Approximate Monthly Salary

- Employment History
- Government issued ID

**b) Personal Data that Adamson collects (on-site)** obtained from the details provided through application forms registration and enrollment processes.

**Collected personal information (PI) may include:**

- Name
- Home Address
- Contact Details
- Year Graduated
- Course/Program
- Job Details
- Email Address
- Proof of identity
- Photographs
- Others, as required

**Some sensitive personal information collected (SPI) collected on-site may include:**

- Age
- Gender
- Approximate Monthly Salary
- Government issued ID
- Employment History
- Health records
- Information about exam /grades
- Videos from events and CCTV recordings
- Ethnic origin
- Sexual orientation
- Others, as required

## 2) Our Reasons for Collecting Personal Data:

Adamson University ensures that all personal data processing are lawful and authorized as permitted by the Law. Where necessary, data subject's consent is obtained before the processing of their personal data.

To meet certain legal requirements when;

- a) Enrolling a data subject as a student and maintaining student records;
- b) Administering courses and academic progress;
- c) Administering the financial aspects of studies, including tuition and accommodation fees;
- d) Providing or offering facilities and services during data subject's time as a student and thereafter as part of the University's legitimate business (e.g. library access, computing, sports facilities, accommodation, recognized student organization membership, alumni membership and activities);
- e) Submitting reports and statistics for which the University is required to comply.

We collect personal information from our web forms, telephone calls, and emails for the following intended purposes:

- a) To register in the Alumni Tracer Database
- b) To answer concerns and inquiries
- c) To inform about the latest updates and events of the University
- d) To process enrollment application;
- e) To administer course and academic progress;
- f) To administer the financial aspects of studies, including tuition and accommodation fees;
- g) To submit reports and statistics, for which the University is required to comply.

The University also needs to collect and process some sensitive personal for the following intended purposes:

- a) To provide support and access to University services;
- b) For equal opportunities monitoring;
- c) Before securing employment with us.

### **3) Sharing/Disclosure and Transfer of Personal Data**

#### **Sharing Personal Data within University Departments**

Personal data may be shared between University departments as necessary for monitoring purposes to:

- a. Administer services and facilities, such as the IT facilities, Library and Information Service. Access controls may be applied to particular services, such as computing facilities and some entrances. The University also monitors engagement with courses including attendance;
- b. Ensure security, as these may be used as evidence of breach of the Law and/or University regulations in the prevention, detection and prosecution of crime. The University uses CCTV systems throughout the campus to assist in safeguarding personal security and to aid in the prevention, deterrence and detection of crime. Such processing is carried out in accordance with its CCTV Policy and Procedure;
- c. Assist the University in the compliance of statutory and regulatory requirements.

#### **Sharing/Transfer to External Parties**

The University will only share personal data with external third parties where:

- a. We have data subject's consent;
- b. We are required to do so under a statutory or legal obligation, or
- c. We are permitted to do so in accordance with the Data Privacy Act 2012.

Our external parties includes the following organizations:

- Commission of Higher Education (CHED), Higher Education (HE) funding councils or organizations and other government bodies;
- National Security agencies for security issues;

- Financial sponsors for school tuition fees under sponsorship, scholarship or loan arrangement;
- Education institutions and placement providers;
- Turnitin®: The University uses the Turnitin® system as a plagiarism detection source;
- Debt recovery/credit control for collection of debt on behalf of the University where internal debt recovery procedures have been unsuccessful;
- Insurance agencies in the event of a claim;
- Parent's Portal where students agreed to give consent or authority to parents or named guardian to view or check grades and other relevant information;
- Graduation Organizers.

## 4) Usage of Personal Data

### Online Classes

The following provisions are in response to the *NPC's Code of Conduct to Guide Schools Amid Shift to Online Education*:

Online Learning Platforms not limited to the following - LMS (Learning Management System), Blackboard and/or Google Meet, will be a replacement/alternative to traditional classroom setting.

Personal data collected in an online platform may be thru the following:

- Registering for classes or other programs related to any student activity
  - Signing-in to use and access the Learning Portal
  - Recording of attending and/or watching classes
  - Viewing of grades
  - Conducting and taking examinations
  - And for other related educational purposes
- a. Added responsibility to the University's Breach Response Team, to respond and implement the established Incident Response Procedure. This is to ensure that security is maintained; By having a planned containment of breach to cushion impact and restore integrity in case of a breach,

- b. Breach Drills, security audits and testing are to be conducted to check that planned responses are effective;
- c. Continually explore and adopt measures to prevent security incidents and intrusions thru the online platform.
- d. A review of all existing policy, procedures and guidelines is planned to ensure coverage of the new learning platform.

## **5) Retention and Disposal**

- a. Adamson University will only retain personal information for as long as it is necessary for its intended and declared purposes only and in conformance to the following:
  - University Retention Policy
  - Per mandated by law
  - Other applicable regulations
- b. When the personal data is no longer required, data subjects are ensured that everything is disposed/deleted in a secure manner. Physical documents are shredded and electronic files are taken off from our system securely by our technical experts.

### **For Graduates**

- a. The University needs to store and maintain some records relating to students even after graduation for the following purposes:
  - Tracer Study and Surveys – to know destinations of graduates;
  - Alumni - to maintain contact with graduates;
  - Award verification - University awards are a matter of public record and could be shared without the data subject's knowledge.

## **6) Exercise of Our Data Subjects' Rights**

Adamson University allows the exercise of data subjects' rights relating to their personal data by:

- a. Informing data subjects thru this Privacy Notice and other advisories/announcements what personal data the University collects, how these are used/processed, how it is maintained and disposed of;
- b. Allowing access to data subject's personal data thru a request and approval process;
- c. Allowing rectification of inaccuracy and a required update to the data being maintained by the University;
- d. Entertaining and resolving complaints brought to our attention.
- e. Allowing data subjects to obtain from the University a copy of data of their personal information thru a request and approval process;
- f. Allowing to suspend, withdraw or order the blocking, removal or destruction of personal data from the University's records system, upon discovery and substantial proof that the personal information are incomplete, outdated, false, unlawfully obtained, used for unauthorized purposes or are no longer necessary for the purposes for which they were collected;
  - Object/Opt Out: for evaluation and approval of any objections to or opt out of any data processing systems or data sharing by the University, data subjects may send a request e-mail to the [dpo@adamson.edu.ph](mailto:dpo@adamson.edu.ph). The University reserves the right to refuse any unreasonable requests. We may also retain some information to carry out our services, for legal obligation or compliance purposes.
- g. Indemnifying data subjects for any damages sustained due to such inaccurate, incomplete, outdated, false, unlawfully obtained or unauthorized use of personal information, upon judgement of the Law.
- h. In cases where the exercise of any of the data subject's rights will be made in his/her behalf, proper authorization, justification and approval are required.

## **7) Responsibilities as Adamson's Data Subjects**

- a. Update your details: It is essential that you let the University know if your contact details change. If the University does not have the correct contact details, we cannot take responsibility of any information you require that may be sent to wrong address/contact information.
- b. Taking care of the Personal Data of others: If personal data is accessible to you or you are responsible in processing personal data, then you are expected to

comply with University Policy and Procedures and adhere to the provisions of the Data Privacy Act of 2012.

Email us at [dpo@adamson.edu.ph](mailto:dpo@adamson.edu.ph) if you wish to exercise your rights as stated on this Privacy Notice.

## 8) Changes to this Privacy Notice

The University may modify or amend this Privacy Notice from time to time to keep up with any changes in relevant laws and regulations applicable to us or how we collect, use, protect, store, share or dispose of our data subjects' personal information. Any relevant updates will be posted to this Website.

## 9) For Inquiries

For any questions or concerns with your Personal Data or with this Notice, contact us at

Email address:	<b>dpo@adamson.edu.ph</b>
Contact Detail:	<b>8524-20-11 loc. 301</b>
Address:	<b>Adamson University DPO Office 900 San Marcelino Street, Ermita 1000 Manila, Philippines</b>
Contact Person:	<b>Data Protection Officer</b>