



## **DATA PRIVACY NOTICE FOR ASSOCIATES**

### **I. INTRODUCTION**

FEU Alabang (FEUA) is committed to complying with Republic Act 10173, otherwise known as the Data Privacy Act of 2012 (DPA) with the aim to protect the right to data privacy of FEU Alabang associates (the Data Subject).

This Privacy Notice explains the purposes for the collection, processing, storing, updating, disposing, or sharing your personal data in relation to your employment and engagement with FEUA. Please note that this document may not contain all data processing systems of FEUA. Please visit the FEU Alabang websites for other privacy notices pertaining to specific data processing systems.

Under the DPA, personal information may be collected, processed, used, stored, disclosed and, shared under the following conditions:

1. With the consent of the data subject
2. Pursuant to a contract with the data subject
3. When it is necessary for FEUA to comply with legal obligation
4. To protect vitally important interests including life and health
5. In order to respond to a national emergency
6. To comply with the requirements of public order and safety
7. Pursuant to the legitimate interests of FEUA or a third party, except where such interests are overridden by the data subject's fundamental rights.

Meanwhile, sensitive personal information may be processed under the following conditions:

1. With the consent of the data subject
2. When such is allowed by laws and regulations, and such regulatory enactments provide for the protection of such information, and the consent of the data subject is not required.
3. When needed to protect the life and health of the data subject, or another person, and the data subject is unable to legally or physically express consent, in case of medical treatment
4. For the protection of lawful rights and interests of natural or legal persons in court proceedings.

### **II. FEUA Human Resources Office**

FEUA Human Resources Office (HRO) respects and values your rights as a Data Subject. We are committed to protecting personal information that is collected, processed, stored, updated,

disposed, or shared in accordance with the requirements of the DPA, its Implementing Rules and Regulations, and the circulars and advisories of the National Privacy Commission.

For this purpose, FEUA HRO implements reasonable and appropriate organizational, physical, and technical security measures to maintain the confidentiality, integrity, and availability of such personal information.

FEUA HRO uses and processes submitted personal data of qualified and hired individuals in relations to its mandate and functions.

### **III. Sources and Personal Data Collected**

You provided FEUA HRO various personal data when you applied for a position in FEUA. When you submitted your application and provided documents as well as references and letter of recommendations, you authorized FEUA and granted consent to verify such information by securing relevant documents from third parties (e.g. academic institution) and obtained the prior consent of third parties providing you with a reference or recommendation letter for FEUA to process their personal information in connection with your application.

In the course of your employment or engagement with FEUA, you accomplish, or sign forms required by law or file applications (leaves, loans, benefits, trainings and the like), and in some instances in collaboration with others, produce as part of your function's documents, records, publications, research, minutes, records of proceedings, and the like containing your personal data.

Some forms require you to provide a photograph. In some instances, your image is captured when FEUA documents, records, published, broadcasts, transmits, uploads, or streams university activities or events like the graduation ceremony.

FEUA operated closed circuit television (CCTV) systems for the safety and security of everyone including associates, students, alumni and guests, as well as its buildings, surrounding premises, and assets. While operating such CCTV systems, FEUA may capture your images. FEUA also operates the Turnstiles System to check and verify your identity and Smart Tapping System to monitor and record your entry and exit to the university. In the case of some offices, biometric information may also be used to check attendance.

FEUA may also collect publicly available information about you.

FEUA HRO collects personal data necessary and mandatory to perform its functions and these include:

1. Name, birthdate, place of birth, gender, marital status, nationality, maiden name, wedding date.

2. Family details such as name of family members, birthdate, gender, address, contact details, and occupation.
3. Contact information such as address, email, mobile, and telephone numbers.
4. Emergency contacts such name, relationship, address, home telephone number, mobile number, name, and contact details of physician.
5. Language proficiency such language name and proficiency level.
6. Banks details for salary purposes such as bank name, bank address, account number, bank contact details, and account type.
7. Past employment details such as company name, contact address and numbers, period of employment, position title, reason for leaving, copy of certificate of employment, personnel clearance.
8. Background information verification.
9. Education details or academic information such as type of school attended, name of school, course, year graduated, degree, address of school, dates, copy of diploma, transcript of records, scholarships, and honors/awards received.
10. Employment information such as government-issued numbers, position, and functions.
11. Medical information such as physical, and psychological information.
12. Publications/research/ creative outputs.
13. Trainings and seminars attended.
14. Photos, resume, professional license card.
15. Community and outreach program
16. Birth certificate, marriage certificate, medical results, annual physical examination results,
17. Performance appraisal and teaching performance evaluation results.
18. Biometric records.

FEUA HRO encodes or process your personal information through the Human Resource Information System (HRIS).

#### **IV. Purposes for the Processing of Personal Data**

FEUA HRO process your personal data for the following purposes:

A. For those applying for positions:

1. To process submitted forms and documents bearing personal information for the purpose of determining the fitness of the applicant for the position applied for.
2. To facilitate the conduct of mandatory pre-employment examinations.
3. To facilitate planning and staffing.
4. To verify the applicant's identity, prevent identity fraud, and conduct reference or background checks.
5. To communicate with you regarding your application.
6. In the event you are not selected for a position, FEU HRO may, at its sole discretion and with your consent, retain your application and supporting documents in order for HRO to consider you for other positions for which you appear to be qualified.

B. For those employed or engaged by FEUA:

1. To verify your identity and prevent identity fraud;
2. To facilitate your employment or engagement, which includes processing your pre-appointment requirements, including medical clearance;
3. To perform personnel actions such as the issuance or renewal of your appointment or contract, process promotions, process your applications for leaves, retirement and the like.
4. To facilitate entry into contracts involving FEUA and third parties, such as with a banking institution, where FEUA will directly deposit compensation of employees, and the like;
5. To communicate with you regarding matters related to your employment or engagement and other legitimate concerns;
6. To create/issue, modify and cancel/delete, clearances or access to FEUA's information and communications technology (ICT) based data processing systems, including email;
7. To maintain employee records or records of your contract(s), as required by law;
8. To assess your performance and competencies;
9. To provide you with available training and development opportunities beneficial to you and FEUA;
10. To process your applications for grants, scholarships, attendance in seminars, conferences, and the like as well as other similar applications in the case of qualified personnel;
11. To process your payroll, allowances, and other benefits, and make direct deposit of payments to your bank account;
12. To provide, facilitate or manage health and other welfare-related services, when available, to qualified personnel and their dependents, subject to FEUA's rules;
13. To comply with internal processes and legal requirements in the administration of disciplinary proceedings;
14. To investigate and resolve work-related incidents;
15. To provide a safe workplace and secure FEUA premises from threats, theft, robbery, fraud, legal liability, and similar incidents;
16. To manage the assets and documents that may have been released to you in the course of your employment with FEUA;
17. To process the disbursement of expenses that may have been incurred by you in the performance of your functions;
18. To process any certifications, or any other documents that you may request from FEUA in relation to your employment or engagement;
19. To establish a contact point in the event of an emergency involving you, your colleagues, or third parties;
20. To comply with the obligations stipulated in your employment or engagement contract;
21. To conduct audits, or investigate a complaint or security threat;
22. When so required, to process the termination of your employment or engagement;
23. When so required, to settle accountabilities upon termination of your employment or engagement;

24. To compile statistics and conduct research, subject to the provisions of the DPA, and applicable research ethics guidelines;
25. To enable you to participate, where applicable, in selection processes, such as for the selection of the Faculty, and the like;
26. In order to issue your FEUA radio frequency identification (RFID) card, HRO will process your name, employee number and photograph. A unique randomly generated number, as well as your employee number, will be encoded in the RFID tag or chip of your FEUA ID such that these will be the only information that can be read by a compatible RFID reader.

- C. To establish, exercise, or defend legal claims;
- D. To fulfill other purposes directly related to the above-stated purposes; and
- E. For such other purposes as allowed by the DPA and other applicable laws.

## **V. Third Party Disclosures**

FEUA HRO may share or disclose your personal information with third parties necessary for the abovementioned purposes. Such third parties may include the following:

1. FEU Group of Schools, affiliates as well as business partners, service providers and contractors or subcontractors;
2. Disclosures to organizations necessary for accreditation and university ranking purposes such as PACU-COA, PAASCU, AUN-QA, The ICE (ITHM), WURI International, AACSB – International (IABF);
3. Disclosures to the National Privacy Commission and other government bodies or agencies such as Commission on Higher Education, Department of Education, Bureau of Immigration, Department of Foreign Affairs, Civil Service Commission, Bureau of Internal Revenue, Professional Regulation Commission, Department of Labor and Employment, Department of Health and its accrediting hospitals as deemed necessary;
4. Disclosures needed to facilitate the application of benefits;
5. Disclosures needed in publishing, broadcasting, transmitting, uploading or streaming of FEUA activities or events pursuant to the legitimate interests of FEUA or third parties, as allowed by the DPA;
6. Disclosures needed in order to enable FEUA to deposit salaries and other compensation directly to an employee's bank account;

7. Disclosures made in order for FEUA to respond to an emergency and comply with its duty to exercise due diligence to prevent harm or injury to you or others.

FEUA HRO may disclose or share collected personal data when required to do so by law or if such legal disclosure is reasonably necessary to comply with legal processes or respond to any claims.

Any personal information shared with such third parties shall also be covered by the appropriate agreement to ensure that all personal information is adequately safeguarded and in accordance with the requirements of Data Privacy Act of 2012.

Where applicable, FEUA will take reasonable steps to require third parties who receive your personal data to uphold your right to data privacy.

## **VI. Security, Storage, and Location of Personal and Collected Data**

FEUA has put in place physical, organizational and technical measures to protect your right to privacy and is committed to reviewing and improving the same.

Personal information collected via the internet or other electronic methods are stored in a secure IT infrastructure in possession or control of FEUA or in cloud controlled by FEUA, while physical records of personal information are stored in folders or envelopes in locked in filing cabinets. Only authorized FEUA HRO or FEUA personnel are granted access to personal information collected by FEU HRO.

## **VII. Retention and Disposal of Personal Information**

FEUA HRO retains the personal information it collects only for the period allowed under applicable laws and regulations and shall immediately destroy or dispose, in a secure manner, any personal information the retention of which is not allowed under the said applicable laws and regulations.

FEUA HRO generally subscribes to the following:

1. Employees data and employment records are kept in the locked in cabinets located at HRO records room;
2. Employment records shall be kept permanently;
3. The disposal or permanent deletion of records are done through shredding or any other means to ensure that it will be impossible to reconstruct or retrieved the information contained therein.

FEUA HRO ensures that no data contained in the records if any, will be exposed or subject to unauthorized access or use.

## **VIII. Access and Rights of Data Subjects**

You have the right to access personal data being processed by FEUA HRO about you. You may access your personal information, for instance, where applicable through the Human Resources Information System (HRIS).

As a data subject, you have the following rights under the Data Privacy Act:

1. The right to be informed whether personal information pertaining to him or her shall be, are being or have been processed.
2. The right to be furnished with the information before the entry of his or her personal information into the processing system of the personal information controller.
3. The right to reasonable access to the data subject's information upon demand.
4. The right to dispute the inaccuracy or error in the personal information and have the personal information controller correct it immediately and accordingly unless the request is vexatious or otherwise unreasonable.
5. The right to suspend, withdraw or order the blocking, removal, or destruction of his or her personal information from the personal information controller's filing system upon discovery and substantial proof that the personal information is incomplete, outdated, false, unlawfully obtained, used for unauthorized purposes or are no longer necessary for the purposes for which they were collected.
6. The right to be indemnified for any damages sustained due to such inaccurate, incomplete, outdated, false, unlawfully obtained, or unauthorized use of personal information.
7. The right to data portability thru the ability to obtain from the personal information controller a copy of data undergoing processing in an electronic or structured format, which is commonly used and allows for further use by the data subject.
8. The right to lodge a complaint before the National Privacy Commission.

## **IX. Obtaining and Withdrawing Your Consent**

FEUA HRO obtains your consent for the processing of your personal data pursuant to this privacy notice by asking you to sign the relevant form or, in some instances, to give your consent through electronic means. If you wish to withdraw consent, please write or send an email to the relevant FEUA office that processes your information and identify the processing activity for which you are withdrawing consent. Note that consent may be withdrawn only for a processing activity for which consent is the only applicable lawful ground for such processing. Please await the responsible office's action regarding your request. Rest assured that once such office confirms that you have validly withdrawn consent for a processing activity the same shall be effective unless you thereafter send a letter or email to said office with a copy of your ID that you are consenting to such processing activity.

## **X. Revisions to This Privacy Notice and Queries Regarding Data Privacy**

We encourage you to visit the site where this notice is posted from time to time to see revisions to this privacy notice. We will alert you regarding changes to this notice through this site.

For queries, concerns, comments or suggestions regarding this System-wide privacy notice, as well as data privacy queries or concerns regarding the processing of your personal data, please contact the FEUA Data Protection Officer through the following:

### **The Data Protection Officer**

FEU Alabang

Wood District, Corporate Woods cor. South Corporate Avenues,

Filinvest City, Alabang

Tel: (02) 8288-8338 Loc 137

Email: [\*\*dpo@feualabang.edu.ph\*\*](mailto:dpo@feualabang.edu.ph)