
	DEPARTMENT OF AGRICULTURE NATIONAL DAIRY AUTHORITY	Document Code	NDA-DP
	DATA PRIVACY MANUAL	Revision No.	01
		Effectivity	15 March 2018
		Page	2

Table of Contents

1. RATIONALE	3
2. OBJECTIVES	4
3. SCOPE AND LIMITATIONS	4
4. PROCESSING OF PERSONAL DATA	5
5. SECURITY MEASURES	6
6. DUTIES AND RESPONSIBILITIES	7
7. DATA BREACH PREVENTIONS	9
8. INQUIRIES AND COMPLAINTS	9
9. ADMINISTRATIVE LIABILITIES	10
10. ACRONYMS AND DEFINITION OF TERMS	10
11. ANNEXES	11
ANNEX A. CONSENT FORM	12
ANNEX B. REQUEST & ACCESS FORM	13
ANNEX C. REQUEST FOR CORRECTION FORM	14

DOCUMENT CONTROL	
<i>Original</i>	<i>Copy</i>
<p>This document is a sole property of the DA-NDA. Unauthorized reproduction in part or in whole renders the copy unofficial. Any external disclosure is prohibited without written approval of the Management Representative. Document Control Procedures applies.</p>	

	DEPARTMENT OF AGRICULTURE NATIONAL DAIRY AUTHORITY	Document Code	NDA-DP
		Revision No.	01
	DATA PRIVACY MANUAL	Effectivity	15 Mar 2018
		Page	3

1. RATIONALE

The National Privacy Commission (NPC) issued an Advisory and a Memorandum Circulars (MCs) in compliance to the Republic Act (RA) No. 10173, otherwise known as the Data Privacy Act of 2012.

The RA No. 10173 aims to protect personal data in information and communication systems both in the government and the private sector.

To give strength and value of the Act, the NPC reiterating the advisory and the memorandum circular orders to all government sector; to wit:

- NPC Advisory No. 2017-01 regarding the designation of Data Protection Officers (DPO)
- Four (4) Memorandum Circulars (MCs);
 - ✓ NPC Circular No. 2016-01, Sec. 4(a) – *Security of Personal Data in Government Agencies*
 - ✓ NPC Circular No. 16-02 – *Data sharing Agreements Involving Government Agencies*
 - ✓ NPC Circular No. 16-03 – *Personal Data Breach Management*
 - ✓ NPC Circular No. 16-04 – *Rules of Procedure*


The National Dairy Authority (NDA) needs to gather and use certain information about individuals. These include customers, suppliers, business contacts, employees and other people the organization has a relationship with or may need to contact.

This policy describes how this personal data must be collected, handled and stored to meet the agency's data protection standards and to comply with the law.

In compliance to the law, the NDA shall designate the following persons with special function, like:

- a) DPO – Data Protection Officer/s
- b) PIP – Personal Information Processor
- c) PIC – Personal Information Controller

DOCUMENT CONTROL	
<i>Original</i>	<i>Copy</i>
<small>This document is a sole property of the DA-NDA. Unauthorized reproduction in part or in whole renders the copy unofficial. Any external disclosure is prohibited without written approval of the Management Representative. Document Control Procedures applies.</small>	

	DEPARTMENT OF AGRICULTURE NATIONAL DAIRY AUTHORITY	Document Code	NDA-DP
	DATA PRIVACY MANUAL	Revision No.	01
		Effectivity	15 Mar 2018
		Page	4


2. OBJECTIVES

- 2.1. The manual aims to safeguard individual clients' personal data against misuse, by regulating the proper management of personal data/information.
- 2.2. To control the way information is handled and to give legal rights to people who have information stored about them.

3. SCOPE AND LIMITATIONS

- 3.1. The manual shall cover the Data Privacy request addressed to the National Dairy Authority and all its offices as follows:
- a. Central Office
 - b. North Luzon Department
 - c. South Luzon Department
 - d. Central Visayas Department
 - e. Western Visayas Department
 - f. Northern Mindanao Department
 - g. Southern Mindanao Department
 - h. And other satellite or NDA related project offices.
- 3.2. It applies to all data that the agency holds relating the identifiable individuals regardless of the type of employment, stakeholders and other clients. This includes:
- a) NDA PERSONNEL**
- Names of individuals
 - Postal addresses
 - Email addresses
 - Telephone / Contact numbers
 - Other information (document) relating to individuals
 - Personal Bio-Data
 - Service Record
 - SALN
 - Withholding tax
 - Payroll/Payslip

DOCUMENT CONTROL	
<i>Original</i>	<i>Copy</i>
<small>This document is a sole property of the DA-NDA. Unauthorized reproduction in part or in whole renders the copy unofficial. Any external disclosure is prohibited without written approval of the Management Representative. Document Control Procedures applies.</small>	

	DEPARTMENT OF AGRICULTURE NATIONAL DAIRY AUTHORITY	Document Code	NDA-DP
	DATA PRIVACY MANUAL	Revision No.	01
		Effectivity	15 Mar 2018
		Page	5

b) NDA STAKEHOLDERS/CLIENTS

- Household Member Information
 - Last Name, First Name, Middle Name and Extension Name
 - Address
 - Age
 - Sex
 - Marital Status
 - Contact Information
 - Farmer Classification
 - Name of Cooperative
 - Highest Educational Attainment
- Farm Location
- Land Ownership
- Farm History
- Infrastructure
- Manpower
- Production Practice
- Products and Market Description/Sales

4. PROCESSING OF PERSONAL DATA

This refers to the various data life cycles: collection of personal data, to their actual use, storage or retention, and destruction.

4.1. Collection – This refers to the type of data collected, mode of collection, person collecting information with the consent (*see Form: Annex A – Consent*) of the subject.


4.1.1. The PIP/PIC is responsible for collecting information; collection of data depends on the type of information and can be collected once, monthly, quarterly, semester or annual.

4.1.2. Data to be collected can be in a form of hard copy or e-copy and shall be consolidated by the PIP/PIC.

4.1.3. If data subject noted an erroneous data collected; he/she has the right to file for correction/erasure (*see Form: Annex C – Request for Correction/Erasure*)

4.2. Use - Data collected shall be used by the agency for documentation purposes, for warranty tracking vis-à-vis purchased items, and for the inventory of goods.

DOCUMENT CONTROL	
<i>Original</i>	<i>Copy</i>
<small>This document is a sole property of the DA-NDA. Unauthorized reproduction in part or in whole renders the copy unofficial. Any external disclosure is prohibited without written approval of the Management Representative. Document Control Procedures applies.</small>	


	DEPARTMENT OF AGRICULTURE NATIONAL DAIRY AUTHORITY	Document Code	NDA-DP
	DATA PRIVACY MANUAL	Revision No.	01
		Effectivity	15 Mar 2018
		Page	6

- 4.3. **Storage, Retention and Destruction** – Means of storage, security measures, form of information stored, retention period, disposal procedure.
- 4.3.1. For e-copy storage, should be situated at the server. If stored in USB, only authorized personnel are allowed to carry, open and transfer of the said documents.
- 4.3.2. For hard copy, document should be filed at the filing cabinet at the restricted area. Retention of the hard copy should be 10 years or it depends on the importance of such data.
- 4.3.3. Storage for both e-copy and hard copy must be protected with a strong password and should be kept and locked using keys, respectively.
- 4.4. **Access** - Personnel authorized to access (*see Form: Annex B – Access Request*) personal data, purpose of access, mode of access, requests for amendment of personal data.
- 4.4.1. Only authorized personnel can access and pull-out the data as designated in this policy.
- 4.4.2. Individuals can access others' data as long as they are given the authorization/consent.
- 4.5. **Disclosure** - Individuals to whom personal data is shared, disclosure of policy and processes, outsourcing and subcontracting.
- 4.5.1. All employees (regular, contractual, Job Order) of the agency shall maintain the confidentiality and secrecy of all personal data.
- 4.5.2. Personal data under the custody of the agency shall be disclosed only pursuant to a lawful purpose, and to authorized recipients of such data.

5. SECURITY MEASURES

- 5.1. The NDA Security measures aim to maintain the availability, integrity and confidentiality of personal data and protect them against natural dangers such as accidental loss or destruction, and human dangers such as unlawful access, fraudulent misuse, unlawful destruction, alteration and contamination.
- 5.2. The agency keeps and protects information using a secured server behind a firewall, encryption and security controls. Restricts access personal information only to qualified and authorized personnel who hold the information with strict confidentiality. Undergo regular audit and rigorous testing of the infrastructure's security protocols to ensure that data is always protected. Updates the information securely to keep the records accurate.

DOCUMENT CONTROL	
<i>Original</i>	<i>Copy</i>
<small>This document is a sole property of the DA-NDA. Unauthorized reproduction in part or in whole renders the copy unofficial. Any external disclosure is prohibited without written approval of the Management Representative. Document Control Procedures applies.</small>	

	DEPARTMENT OF AGRICULTURE NATIONAL DAIRY AUTHORITY	Document Code	NDA-DP
	DATA PRIVACY MANUAL	Revision No.	01
		Effectivity	15 Mar 2018
		Page	7

5.2.1. Organization Security Measures

5.2.1.1. Data Protection Officer (DPO)

- Conduct of trainings or seminars to keep personnel, updated vis-à-vis developments in data privacy and security.
- Conduct of Privacy Impact Assessment (PIA)
- Recording and documentation of activities carried out by the DPO
- Duty of Confidentiality.
- Review of Privacy Manual. It shall be reviewed and evaluated annually.

5.2.2. Physical Security Measures

- Format of data to be collected. It can be a word, excel and pdf type.
- Storage type and location
- Access procedure of agency personnel
- Monitoring and limitation of access to room or facility
- Design of office space/work station
- Persons involved in processing, and their duties and responsibilities
- Modes of transfer of personal data within the organization, or to third parties
- Retention and disposal procedure

5.2.3. Technical Security Measures

- Monitoring for security breaches
- Security features of the software/s and application/s used
- Process for regularly testing, assessment and evaluation of effectiveness of security measures.
- Encryption, authentication process, and other technical security measures that control and limit access to personal data

6. DUTIES AND RESPONSIBILITIES


Everyone who works with the Agency has some responsibility for ensuring data is collected, stored and handled appropriately.

Personnel handles personal data must ensure that it is handled and processed in line with this policy and data protection principles.

However, these people have key areas of responsibility:

- The **Administrator/Deputy Administrator** is ultimately responsible for ensuring that NDA meets its legal obligations.

DOCUMENT CONTROL	
<i>Original</i>	<i>Copy</i>
<small>This document is a sole property of the DA-NDA. Unauthorized reproduction in part or in whole renders the copy unofficial. Any external disclosure is prohibited without written approval of the Management Representative. Document Control Procedures applies.</small>	


	DEPARTMENT OF AGRICULTURE NATIONAL DAIRY AUTHORITY	Document Code	NDA-DP
	DATA PRIVACY MANUAL	Revision No.	01
		Effectivity	15 Mar 2018
		Page	8

- The **CORPLAN Manager**, acting as the **Overall Data Protection Officer (ODPO)** and all Department Managers are designated as **Data Protection Officer (ODPOs)** shall be responsible for:
 - a) Ensuring the Agency's compliance with the Data Privacy Act (DPA).
 - b) Keeping the agency updated about data protection responsibilities, risk and issues.
 - c) Reviewing all data protection procedures and related policies, in line with an agreed schedule.
 - d) Arranging data protection training and advice for the people covered by this policy.
 - e) Handling data protection questions from staff and anyone else covered by this policy.
 - f) Dealing with requests from individuals to see the data of the agency holds about them.
 - g) Checking and approving any contracts or agreements with third parties that may handle the agency's sensitive data.

- The **Division Chiefs of Planning, MIS & Finance Divisions** are designated as **Personal Information Controllers (PICs)** and shall be responsible for:
 - a) Ensuring all systems, services and equipment used for storing data meet acceptable security standards.
 - b) Performing regular checks and scans to ensure security hardware and software is functioning properly.
 - c) Evaluating any third-party services the agency is considering using to store or process data. For instance, cloud computing services.

- The **Human Resource Management Officer** is responsible for:
 - a) Effectively communicate to its personnel, the designation of the DPO and PICs and their functions.
 - b) Allow the DPO and PICs to be involved from the earliest stage possible in all issues relating to privacy and data protection.
 - c) Provide sufficient time and resources necessary for the DPO and PICs to keep themselves updated with the developments in data privacy and security.
 - d) Grant the DPO/PICs appropriate access to the personal data it is processing, including the processing systems.
 - e) Promptly consult the DPO/PICs in the event of a personal data breach or security incident.

DOCUMENT CONTROL	
<i>Original</i>	<i>Copy</i>
<small>This document is a sole property of the DA-NDA. Unauthorized reproduction in part or in whole renders the copy unofficial. Any external disclosure is prohibited without written approval of the Management Representative. Document Control Procedures applies.</small>	

	DEPARTMENT OF AGRICULTURE NATIONAL DAIRY AUTHORITY	Document Code	NDA-DP
	DATA PRIVACY MANUAL	Revision No.	01
		Effectivity	15 Mar 2018
		Page	9

7. DATA BREACH PREVENTIONS

The Agency's PIP/PIC shall implement policies and procedures for the management of a personal data breach, including security incidents.

This describes or outlines such policies and procedures, including the following:

1. Creation of a Data Breach Response Team (DBRT)
 - HRMO IV – Head
 - HRMO II – Member
 - ISA II – Member
 - ✓ *They shall be responsible for ensuring immediate action in the event of security incident or personal data breach.*

2. Measures to prevent and minimize occurrence of breach and security incidents.
 - ✓ *The agency thru DPO shall regularly conduct a Privacy Impact Assessment to identify risks in the processing system and monitor for security breaches and vulnerability scanning of computer networks.*

3. Procedure for recovery and restoration of personal data
 - ✓ *The agency shall always maintain a backup file for all personal data under its custody. It shall always compare the backup file with the affected file to determine the presence of any inconsistencies or alterations resulting from the incident or breach.*


4. Notification protocol
 - ✓ *Notify any of the DBRT regarding the breaching, opening and sharing of documents without passing the right protocols.*

5. Documentation and reporting procedure of security incidents or a personal data breach
 - ✓ *DBRT shall prepare a detailed documentation of every incident or breach encountered, as well as an annual report, to be submitted to management.*

8. INQUIRIES AND COMPLAINTS

- Each data subject has the right to a reasonable access to his or her personal data being processed by the personal information controller or personal information processor.
- He/She writes to the Head of the Agency and briefly discusses the inquiry, together with his/her contact details for reference.
- Complaints shall be filed in three (3) printed copies. The concerned department or units shall confirm with the complainant its receipt of the complaint.

DOCUMENT CONTROL	
<i>Original</i>	<i>Copy</i>
<small>This document is a sole property of the DA-NDA. Unauthorized reproduction in part or in whole renders the copy unofficial. Any external disclosure is prohibited without written approval of the Management Representative. Document Control Procedures applies.</small>	

	DEPARTMENT OF AGRICULTURE NATIONAL DAIRY AUTHORITY	Document Code	NDA-DP
		Revision No.	01
	DATA PRIVACY MANUAL	Effectivity	15 Mar 2018
		Page	10


9. ADMINISTRATIVE LIABILITIES

- 9.1. Failure to comply with the provisions of this Data Privacy Manual shall be a ground for the following administrative penalties:
- 1st Offense - Reprimand;
 - 2nd Offense - Suspension of one (1) to thirty (30) days; and
 - 3rd Offense - Dismissal from the service.
- 9.2. The Revised Rules on Administrative Cases in the Civil Service shall be applicable in the disposition of cases under this DP Manual.
- 9.3. Nothing in this DP Manual shall be interpreted to deviate from any law, any rules, or regulation prescribed by anybody or agency, which provides for more stringent penalties.

10. ACRONYMS AND DEFINITION OF TERMS

- 10.1. **DATA SHARING (DSh)** – is the disclosure or transfer to a third party of personal data under the custody of a personal information controller or personal information processor. In the case of the latter, such disclosure or transfer must have been upon the instructions of the personal information controller concerned. The term excludes outsourcing, or the disclosure or transfer of personal data by a personal information controller to a personal information processor.
- 10.2. **DATA SUBJECT (DSu)** – refers to an individual whose personal information is processed.
- 10.3. **DATA PROTECTION OFFICER/s (DPO)** – refers to individuals designated by the head of agency to be accountable for the agency’s compliance with the Act and must be organic employees of the government agency.
- 10.4. **PERSONAL DATA (PD)** – refers to all types of personal information.
- 10.5. **PERSONAL DATA BREACH (PDB)**- refers to a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored, or otherwise processed.

DOCUMENT CONTROL	
<i>Original</i>	<i>Copy</i>
<small>This document is a sole property of the DA-NDA. Unauthorized reproduction in part or in whole renders the copy unofficial. Any external disclosure is prohibited without written approval of the Management Representative. Document Control Procedures applies.</small>	


	DEPARTMENT OF AGRICULTURE NATIONAL DAIRY AUTHORITY	Document Code	NDA-DP
	DATA PRIVACY MANUAL	Revision No.	01
		Effectivity	15 Mar 2018
		Page	11

- 10.6. **PERSONAL INFORMATION (PI)** – refers to any information, whether recorded in a material form or not, from which the identity of an individual is apparent or can be reasonably and directly ascertained by the entity holding the information, or when put together with other information would directly and certainly identify and individual.
- 10.7. **PERSONAL INFORMATION CONTROLLER (PIC)** - refers to a person or organization who controls the collection, holding, processing or use of personal information, including a person or organization who instructs another person or organization to collect, hold, process, us, transfer or disclose personal information on his or her behalf. The term excludes:
- 10.7.1. *A person or organization who performs such functions as instructed by another person or organization; and*
- 10.7.2. *An individual who collects, holds, processes or uses personal information in connection with the individual’s personal, family or household affairs.*
- 10.8. **PERSONAL INFORMATION PROCESSOR (PIP)** – refers to any natural or juridical person qualified to act as such under RA No. 10173 to whom a personal information controller may outsource the processing or personal data pertaining to a data subject.
- 10.9. **PROCESSING (P)** – refers to any operation or any set of operations performed upon personal information including, but not limited to, the collection, recording, organization, storage, updating or modification, retrieval, consultation, use, consolidation, blocking, erasure or destruction of data.

11. ANNEXES

- 11.1. Annex A – Consent Form
- 11.2. Annex B – Access Request Form
- 11.3. Annex C – Request for Correction on Erasure

DOCUMENT CONTROL	
<i>Original</i>	<i>Copy</i>
<small>This document is a sole property of the DA-NDA. Unauthorized reproduction in part or in whole renders the copy unofficial. Any external disclosure is prohibited without written approval of the Management Representative. Document Control Procedures applies.</small>	

	DEPARTMENT OF AGRICULTURE NATIONAL DAIRY AUTHORITY	Document Code	NDA-DP
	DATA PRIVACY MANUAL	Revision No.	01
		Effectivity	15 Mar 2018
		Page	12

ANNEX A. CONSENT FORM

I, the undersigned, confirm that (please tick box as appropriate):

1.	I have read and understood the information about the profile/personal data sheet, as provided in the Information Sheet dated _____.	<input type="checkbox"/>
2.	I have been given the opportunity to submit the hard copy of all my personal information.	<input type="checkbox"/>
3.	I voluntarily agree to participate in the compliance of the data privacy.	<input type="checkbox"/>
4.	I understand I can contest any time if found any discrepancy of my data without giving reasons and that I will not be penalized for contesting nor will I be questioned on why I have contested.	<input type="checkbox"/>
5.	The procedures regarding confidentiality have been clearly explained (e.g. use of names, pseudonyms, anonymous data, etc.) to me.	<input type="checkbox"/>
6.	If applicable, separate terms of consent for interviews, audio, video or other forms of data collection have been explained and provided to me.	<input type="checkbox"/>
7.	The use of the data in research, publications, sharing and archiving has been explained to me.	<input type="checkbox"/>
8.	I understand that other researchers will have access to this data only if they agree to preserve the confidentiality of the data and if they agree to the terms I have specified in this form.	<input type="checkbox"/>
9.	Select only one of the following: <ul style="list-style-type: none"> • I would like my name used and understand what I have said or written as part of this study will be used in reports, publications and other research outputs so that anything I have contributed to this information can be recognized. • I do not want my name used in this project. 	<input type="checkbox"/> <input type="checkbox"/>
10.	I, agree to sign and date this informed consent form.	<input type="checkbox"/>


Conforme:

Employee
Signature
Date

Noted:

Data Privacy Officer (DPO)
Signature
Date

DOCUMENT CONTROL	
<i>Original</i>	<i>Copy</i>
This document is a sole property of the DA-NDA. Unauthorized reproduction in part or in whole renders the copy unofficial. Any external disclosure is prohibited without written approval of the Management Representative. Document Control Procedures applies.	

	DEPARTMENT OF AGRICULTURE NATIONAL DAIRY AUTHORITY	Document Code	NDA-DP
		Revision No.	01
	DATA PRIVACY MANUAL	Effectivity	15 Mar 2018
		Page	13

ANNEX B. REQUEST & ACCESS FORM

I, the undersigned, would like to request a copy on the following data: (please tick box as appropriate)

A) FOR STAKEHOLDERS/CLIENTS (Government, Private, Schools, Other Organization)

I wish to ask a copy or access data for Mr./Ms. _____ on the following:

- a) Personal Information
- b) Farm Location
- c) Land Ownership
- d) Infrastructure
- e) Manpower
- f) Production Practice
- g) Products and Market Description/Sales
- h) Others (pls. specify)

B) FOR NDA PERSONNEL


- a) Personal Data
- b) Service Record
- c) Sworn Statement of Assets, Liabilities and Net Worth (SALN)
- d) Payroll/Payslip
- e) Withholding Tax
- f) Others (pls. specify)

RequisitionerSignatureDate

Approved by:

Data Privacy Officer (DPO)SignatureDate

DOCUMENT CONTROL	
<i>Original</i>	<i>Copy</i>
<small>This document is a sole property of the DA-NDA. Unauthorized reproduction in part or in whole renders the copy unofficial. Any external disclosure is prohibited without written approval of the Management Representative. Document Control Procedures applies.</small>	

	DEPARTMENT OF AGRICULTURE NATIONAL DAIRY AUTHORITY	Document Code	NDA-DP
		Revision No.	01
	DATA PRIVACY MANUAL	Effectivity	15 Mar 2018
		Page	14

ANNEX C. REQUEST FOR CORRECTION FORM

I, the undersigned, would like to request for a correction on the following data: (please tick box as appropriate)

FOR NDA PERSONNEL

- | | |
|--------------------------|--|
| <input type="checkbox"/> | i. Personal Data |
| <input type="checkbox"/> | ii. Service Record |
| <input type="checkbox"/> | iii. Sworn Statement of Assets, Liabilities and Net Worth (SALN) |
| <input type="checkbox"/> | iv. Payroll/Payslip |
| <input type="checkbox"/> | v. Withholding Tax |
| <input type="checkbox"/> | vi. Others (pls. specify) |

Requisitioner	Signature	Date
---------------	-----------	------

Approved by:

Data Privacy Officer (DPO)	Signature	Date
----------------------------	-----------	------

DOCUMENT CONTROL	
<i>Original</i>	<i>Copy</i>
This document is a sole property of the DA-NDA. Unauthorized reproduction in part or in whole renders the copy unofficial. Any external disclosure is prohibited without written approval of the Management Representative. Document Control Procedures applies.	