



Philippine Realty and Holdings Corporation

DATA PRIVACY MANUAL

20 November 2018



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SECTION 1. BACKGROUND

Republic Act No. 10173, also known as the **Data Privacy Act of 2012 ("DPA")**, aims to protect personal data in information and communications systems both in the government and the private sector.

It ensures that entities or organizations processing personal data establish policies, and implement measures and procedures that guarantee the safety and security of personal data under their control or custody, thereby upholding an individual's data privacy rights. A personal information controller or personal information processor is instructed to implement reasonable and appropriate measures to protect personal data against natural dangers such as accidental loss or destruction, and human dangers such as unlawful access, fraudulent misuse, unlawful destruction, alteration and contamination.

To inform its personnel of such measures, each personal information controller or personal information processor is expected to produce a Privacy Manual. The Manual serves as a guide or handbook for ensuring the compliance of an organization or entity with the DPA, its Implementing Rules and Regulations ("**IRR**"), and other relevant issuances of the National Privacy Commission ("**NPC**"). It also encapsulates the privacy and data protection protocols that need to be observed and carried out within the organization for specific circumstances (e.g., from collection to destruction), directed toward the fulfillment and realization of the rights of data subjects.



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SECTION 2. INTRODUCTION

This Privacy Manual is hereby adopted by Philippine Realty and Holdings Corporation (hereinafter interchangeably referred to as the "**Company**" or the "**Corporation**") in compliance with Republic Act No. 10173 or the Data Privacy Act of 2012 ("**DPA**"), its Implementing Rules and Regulations ("**IRR**"), and other relevant policies, including issuances of the National Privacy Commission ("**NPC**"). This organization respects and values data privacy rights, and makes sure that all personal data collected from its clients, customers, employees, brokers and sales agents, etc., are processed in adherence to the general principles of transparency, legitimate purpose, and proportionality.

The DPA and its IRR seek to enforce and adopt generally accepted international principles and standards for personal data protection. They safeguard the fundamental human right of every individual to privacy while ensuring free flow of information for innovation, growth, and national development. The DPA and its IRR also recognize the vital role of information and communications technology in nation-building and enforce the State's inherent obligation to ensure that personal data in information and communications systems in the government and in the private sector are secured and protected.

This Manual shall inform its reader of the Company's data protection and security measures and may serve as a guide in exercising the reader's rights under the DPA.




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SECTION 3. DEFINITION OF TERMS

Terms used in this Manual shall be defined for consistency and uniformity in usage. This portion will make sure that users of the Manual will understand the words, statements, and concepts used in this document.

- a. **"Act"** refers to Republic Act No. 10173, also known as the Data Privacy Act of 2012;
- b. **"Commission"** refers to the National Privacy Commission;
- c. **"Consent of the data subject"** refers to any freely given, specific, informed indication of will, whereby the data subject agrees to the collection and processing of his or her personal, sensitive personal, or privileged information. Consent shall be evidenced by written, electronic or recorded means. It may also be given on behalf of a data subject by a lawful representative or an agent specifically authorized by the data subject to do so;
- d. **"Data subject"** refers to an individual whose personal, sensitive personal, or privileged information is processed;
- e. **"Data processing systems"** refers to the structure and procedure by which personal data is collected and further processed in an information and communications system or relevant filing system, including the purpose and intended output of the processing;
- f. **"Data sharing"** 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;
- g. **"Direct marketing"** refers to communication by whatever means of any advertising or marketing material which is directed to particular individuals;
- h. **"Filing system"** refers to any set of information relating to natural or juridical persons to the extent that, although the information is not processed by equipment operating automatically in response to instructions given for that purpose, the set is structured,




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either by reference to individuals or by reference to criteria relating to individuals, in such a way that specific information relating to a particular individual is readily accessible;

- i. **"Information and communications system"** refer to a system for generating, sending, receiving, storing, or otherwise processing electronic data messages or electronic documents, and includes the computer system or other similar device by which data is recorded, transmitted, or stored, and any procedure related to the recording, transmission, or storage of electronic data, electronic message, or electronic document;
- j. **"Personal data"** refers to all types of personal information;
- k. **"Personal data breach"** 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;
- l. **"Personal information"** 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 an individual;
- m. **"Personal information controller"** refers to a natural or juridical person, or any other body who controls the processing of personal data, or instructs another to process personal data on its behalf. The term excludes:
 - 1. A natural or juridical person, or any other body, who performs such functions as instructed by another person or organization; or
 - 2. A natural person who processes personal data in connection with his or her personal, family, or household affairs;

There is control if the natural or juridical person or any other body decides on what information is collected, or the purpose or extent of its processing;
- n. **"Personal information processor"** refers to any natural or juridical person or any other body to whom a personal information controller may outsource or instruct the processing of personal data pertaining to a data subject;
- o. **"Processing"** refers to any operation or any set of operations performed upon




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personal data including, but not limited to, the collection, recording, organization, storage, updating or modification, retrieval, consultation, use, consolidation, blocking, erasure or destruction of data. Processing may be performed through automated means, or manual processing, if the personal data are contained or are intended to be contained in a filing system;

- p. **"Profiling"** refers to any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements;
- q. **"Privileged information"** refers to any and all forms of data, which, under the Rules of Court and other pertinent laws constitute privileged communication;
- r. **"Public authority"** refers to any government entity created by the Constitution or law, and vested with law enforcement or regulatory authority and functions;
- s. **"Security incident"** is an event or occurrence that affects or tends to affect data protection, or may compromise the availability, integrity and confidentiality of personal data. It includes incidents that would result to a personal data breach, if not for safeguards that have been put in place;
- t. **"Sensitive personal information"** refers to personal information:
 1. About an individual's race, ethnic origin, marital status, age, color, and religious, philosophical or political affiliations;
 2. About an individual's health, education, genetic or sexual life of a person, or to any proceeding for any offense committed or alleged to have been committed by such individual, the disposal of such proceedings, or the sentence of any court in such proceedings;
 3. Issued by government agencies peculiar to an individual which includes, but is not limited to, social security numbers, previous or current health records, licenses or its denials, suspension or revocation, and tax returns; and
 4. Specifically established by an executive order or an act of Congress to be kept classified.



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SECTION 4. SCOPE AND LIMITATIONS

This section defines the coverage of the Manual. It is to be emphasized that the document is essentially an internal issuance and is meant for the use and application of the organization's staff or personnel.

All personnel of this Company, regardless of the type of employment or contractual arrangement, must comply with the terms set out in this Privacy Manual.

In the future, it may be useful to develop a separate Privacy Manual meant for external use or for persons who deal with the organization. Certain information may be omitted from that version, particularly those that relate to internal policies or processes that are relevant only to personnel of the organization.



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SECTION 5. PROCESSING OF PERSONAL DATA

This section lays out the various data life cycles (or processing systems) in existence within the organization — from the collection of personal data, to their actual use, storage or retention, and destruction.

A. Collection


The Company collects the basic contact information of clients and customers, including their full name, address, email address, contact number, together with the products/properties that they would like to purchase or lease. The sales representative attending to customers will collect such information through accomplished forms.

Collection of personal data must be for a declared, specified, and legitimate purpose.

1. Consent is required prior to the collection and processing of personal data, subject to exemptions provided by the Act and other applicable laws and regulations. When consent is required, it must be time-bound in relation to the declared, specified and legitimate purpose. Consent given may be withdrawn.
2. The data subject must be provided specific information regarding the purpose and extent of processing, including, where applicable, the automated processing of his or her personal data for profiling, or processing for direct marketing, and data sharing.
3. Purpose should be determined and declared before, or as soon as reasonably practicable, after collection.
4. Only personal data that is necessary and compatible with declared, specified, and legitimate purpose shall be collected.
5. Personal data should be accurate and where necessary for declared, specified and legitimate purpose, kept up to date.
6. Inaccurate or incomplete data must be rectified, supplemented, destroyed or their further processing restricted.

B. Use



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Personal data collected shall be used by the Company for documentation purposes, for tracking vis-à-vis purchased or leased properties, and for the inventory of properties.

C. Storage, Retention and Destruction

The Company will ensure that personal data under its custody are protected against any accidental or unlawful destruction, alteration and disclosure as well as against any other unlawful processing. The Company will implement appropriate security measures in storing collected personal information, depending on the nature of the information. Personal data shall not be retained longer than necessary. They may be retained for the following reasons:

1. Retention of personal data shall only be for as long as necessary:
 - (a) for the fulfillment of the declared, specified, and legitimate purpose;
 - (b) for the establishment, exercise or defense of legal claims; or
 - (c) for legitimate business purposes, which must be consistent with standards followed by the real estate industry.

2. Personal data shall be disposed or discarded in a secure manner that would prevent further processing, unauthorized access, or disclosure to any other party or the public, or prejudice the interests of the data subjects.

D. Access


Due to the sensitive and confidential nature of the personal data under the custody of the Company, only the client and the authorized representative of the Company shall be allowed to access such personal data, for any purpose, except for those contrary to law, public policy, public order or morals.

E. Disclosure and Sharing

All employees and personnel of the Company shall maintain the confidentiality and secrecy of all personal data that come to their knowledge and possession, even after resignation, termination of contract, or other contractual relations.

Personal data under the custody of the Company shall be disclosed only pursuant to a lawful purpose, and only to authorized recipients of such data.



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SECTION 6. SECURITY MEASURES

As a personal information controller or personal information processor, the organization will implement reasonable and appropriate physical, technical and organizational measures for the protection of personal data.

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. In this section, those measures are generally described.

A. Organization Security Measures

Every personal information controller and personal information processor must also consider the human aspect of data protection. The provisions under this section shall include the following:

1. Data Protection Officer (DPO), or Compliance Officer for Privacy (COP)

The designated Data Protection Officer is *(to be designated)*.


2. Functions of the DPO, COP and/or any other responsible personnel with similar functions

The Data Protection Officer shall oversee the compliance of the organization with the DPA, its IRR, and other related policies, including the conduct of a Privacy Impact Assessment, implementation of security measures, security incident and data breach protocol, and the inquiry and complaints procedure.

3. Conduct of trainings or seminars to keep personnel, especially the Data Protection Officer updated vis-à-vis developments in data privacy and security

The organization shall sponsor a mandatory training on data privacy and security at least once a year. For personnel directly involved in the processing of personal data, management shall ensure their attendance and participation in relevant trainings and orientations, as often as necessary.



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4. Conduct of Privacy Impact Assessment (PIA)

The Organization shall conduct a Privacy Impact Assessment (PIA) relative to all activities, projects and systems involving the processing of personal data. It may choose to outsource the conduct of PIA to a third party.

5. Recording and documentation of activities carried out by the DPO, or the organization itself, to ensure compliance with the DPA, its IRR and other relevant policies

The Company shall sponsor a mandatory training on data privacy and security as and when necessary. For personnel directly involved in the processing of personal data, management shall ensure their attendance and participation in relevant trainings and orientations, as often as necessary.

6. Duty of Confidentiality

All employees with access to personal data will be asked to sign a Non-Disclosure Agreement. All employees with access to personal data shall operate and hold personal data under strict confidentiality if the same is not intended for public disclosure.


7. Review of Privacy Manual

This Manual shall be reviewed and evaluated annually or as when necessary. Privacy and security policies and practices within the organization shall be updated to remain consistent with current data privacy best practices.

B. Physical Security Measures

This portion features the procedures intended to monitor and limit access to the facility containing the personal data, including the activities therein. It provides for the actual design of the facility, the physical arrangement of equipment and furniture, the permissible modes of transfer, and the schedule and means of retention and disposal of data, among others. To ensure that mechanical destruction, tampering and alteration of personal data under the custody of the organization are protected from man-made disasters, power



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disturbances, external access, and other similar threats, the following provisions must be observed:

1. Format of data to be collected

Personal data in the custody of the organization may be in digital/electronic format and paper-based/physical format.

2. Storage type and location

All personal data being processed by the organization shall be stored in a data room, where paper-based documents are kept in locked filing cabinets while the digital/electronic files are stored in computers provided and installed by the Company.

3. Access procedure of agency personnel

Only authorized personnel shall be allowed inside the data room. For this purpose, they shall each be given a duplicate of the key to the room. Other personnel may be granted access to the room upon filing of an access request form with the Data Protection Officer and the latter's approval thereof.

4. Monitoring and limitation of access to room or facility

All personnel authorized to enter and access the data room or facility must fill out and register with the online registration platform of the organization, and a logbook placed at the entrance of the room. They shall indicate the date, time, duration and purpose of each access.


5. Design of office space/work station

The computers shall be positioned with considerable spaces between them to maintain privacy and protect the processing of personal data.

6. Persons involved in processing, and their duties and responsibilities

Persons involved in processing shall always maintain confidentiality and integrity of personal data. They are not allowed to bring their own gadgets or storage device of any form when entering the data storage room.



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7. Modes of transfer of personal data within the organization, or to third parties

Transfers of personal data via electronic mail shall use a secure email facility with encryption of the data, including any or all attachments.

Facsimile technology shall not be used for transmitting documents containing personal data.

8. Retention and disposal procedure

The Company shall either retain or otherwise dispose of personal data of data subjects in accordance with the guidelines prescribed in Section 5.C.

C. Technical Security Measures

Each personal information controller and personal information processor must implement technical security measures to make sure that there are appropriate and sufficient safeguards to secure the processing of personal data, particularly the computer network in place, including encryption and authentication processes that control and limit access. They include the following, among others:

1. Monitoring for security breaches


The Company shall use an intrusion detection system to monitor security breaches and alert the organization of any attempt to interrupt or disturb the system.

2. Security features of the software/s and application/s used

The Company shall first review and evaluate software applications before the installation thereof in computers and devices of the organization to ensure the compatibility of security features with overall operations.

3. Process for regularly testing, assessment and evaluation of effectiveness of security measures




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The Company shall review security policies, conduct vulnerability assessments and perform penetration testing within the Company on regular schedule to be prescribed by the appropriate department or unit.

4. Encryption, authentication process, and other technical security measures that control and limit access to personal data

Each personnel with access to personal data shall verify his or her identity using a secure encrypted link and multi-level authentication.



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SECTION 7. BREACH AND SECURITY INCIDENTS

The personal information controller or personal information processor must develop and implement policies and procedures for the management of a personal data breach, including security incidents. This section describes or outlines such policies and procedures, including the following:

1. Creation of a Data Breach Response Team

A Data Breach Response Team comprising of five (5) officers shall be responsible for ensuring immediate action in the event of a security incident or personal data breach. The team shall conduct an initial assessment of the incident or breach in order to ascertain the nature and extent thereof. It shall also execute measures to mitigate the adverse effects of the incident or breach.

2. Measures to prevent and minimize occurrence of breach and security incidents

The Company 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. Personnel directly involved in the processing of personal data must attend trainings and seminars for capacity building. There must also be a periodic review of policies and procedures being implemented in the organization.


3. Procedure for recovery and restoration of personal data

The Company shall always maintain a backup file for all personal data under its custody. In the event of a security incident or data breach, it shall always compare the backup with the affected file to determine the presence of any inconsistencies or alterations resulting from the incident or breach.

4. Notification protocol

The Head of the Data Breach Response Team shall inform the management of the need to notify the NPC and the data subjects affected by the incident or breach within the period prescribed by law. Management may delegate the actual notification to the head of the Data Breach Response Team.




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5. Documentation and reporting procedure of security incidents or a personal data breach

The Data Breach Response Team shall prepare a detailed documentation of every incident or breach encountered, as well as an annual report, to be submitted to management and the NPC, within the prescribed period.



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SECTION 8. INQUIRIES AND COMPLAINTS

Every data subject has the right to reasonable access to his or her personal data being processed by the personal information controller or personal information processor.

Other available rights include:

1. Right to dispute the inaccuracy or error in the personal data;
2. Right to request the suspension, withdrawal, blocking, removal or destruction of personal data; and
3. Right to complain and be indemnified for any damages sustained due to inaccurate, incomplete, outdated, false, unlawfully obtained or unauthorized use of personal data.

Accordingly, there must be a procedure for inquiries and complaints that will specify the means through which concerns, documents, or forms submitted to the organization shall be received and acted upon. This section features such procedure.

1. Data subjects may inquire or request for information regarding any matter relating to the processing of their personal data under the custody of the organization, including the data privacy and security policies implemented to ensure the protection of their personal data.
2. They may write to the organization at (*email address to be determined*) and briefly discuss the inquiry, together with their contact details for reference.
3. Complaints shall be filed in three (3) printed copies or sent to (*email address to be determined*).
4. The concerned department or unit shall confirm with the complainant its receipt of the complaint.



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SECTION 9. EFFECTIVITY

This Privacy Manual shall be effective upon distribution and dissemination to all concerned after it has been approved by the Board of Directors of the Company on **20 November 2018** and will be effective until revoked or amended by the Company, through a Board Resolution.

