



## De La Salle Santiago Zobel School Student Data Privacy Statement

De La Salle Santiago Zobel School (hereinafter referred to as “DLSZ”, the “School”, “Us”, “Our”, and “We”) has a strong commitment to protect our students’ personal information from any breaches or unauthorized use of personal information in compliance with the Data Privacy Act of 2012 or otherwise known as Republic Act (R.A.) 10173 as governed by the National Privacy Commission (NPC).

To ensure you can make informed decisions and feel confident in providing your personal information with us, we are providing you this Data Privacy Statement outlining our data collection, usage, retention, disclosure and disposal practices and your rights as “Data Subjects”, as defined by the Act.

The term “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 as defined by the Act. This may include Sensitive personal information that refers to personal information:

About an individual’s race, ethnic origin, marital status, age, color and religious, philosophical or political affiliations;

1. 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 person, the disposal of such proceedings, or the sentence of any court in such proceedings;
2. Issued by government agencies peculiar to an individual which includes, but not limited to, social security numbers, previous or current health records, licenses or its denials, suspension or revocation, and tax returns; and
3. Specifically established by an executive or an act of Congress to be kept classified.
4. This notice applies to all students whose personal information is collected and processed by DLSZ. This notice explains:
  1. How do we collect your personal information?
  2. How do we use information about you?
  3. How do we transfer information about you?
  4. How do we store and dispose of information about you?
  5. What are your rights as data subject?
  6. How do we notify you in case of breach of information?
  7. Why do you comply with data privacy clauses on contracts?
  8. How do we update you to our Privacy Policy?
  9. Where do you go for further information?

### 1. HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

As you intend to become a student of our School, we may or will ask for your personal information (e.g., name, address, and contact information) for us to process. Below are the activities where we will or may collect your personal information:

- During application and student admission  
Upon application for admission, the Office of the Registrar will or may collect your personal information and documentary requirements such as but not limited to name, picture, contact details, family history, educational background for enrolment reconsideration and any or all information obtained through interviews and/or during entrance examinations.
- Prior and during Enrolment  
Upon enrolment, we may or will collect personal information such as, but not limited to your family background, the classes you enroll in, academic undertaking and performance, medical records, and other pertinent information related to our legitimate educational interest

There will be various occasions when we will acquire other forms of data (e.g., pictures or videos of activities he/she participates in, recordings from closed-circuit television cameras installed in the DLSZ premises for security purposes, etc.) or generate statistical information (e.g., School ranking; performance in admissions exams, aptitude tests, etc.).

- During the course of stay in the School  
During your stay at the School, you may be required to provide personal information which includes, but not limited to, the following activities:

*Co-curricular and extracurricular activities.* Your personal information may be collected in relation to co-curricular and extracurricular matters such as academic performance, IPA assessment and psychological assessments, field trips/ Alternative Learning Experience (ALE), outreach and vocation/ formation programs, membership in student organizations/clubs, school paper, varsity and cultural group, advertisement/promotion and participation in competitions, programs, rehearsals and seminars.

*Discipline procedures.* We will collect your personal information to monitor your conduct, manage complaints, investigate incidents/violations and impose disciplinary sanctions.

*Scholarship Programs.* The Student Scholarship Office (SSO) will collect your information for the scholarship programs that you intend to avail, as well as information to monitor your attendance and performance.

*Guidance Services.* The Student Counseling Office (SCO) will collect your personal information for obtaining background on psychological health through counseling. This will serve as the Counselor's guide during the session. Also, this will be used to monitor your behavior and academic performance.

*Safety and Security Operations.* In the conduct of security operations, we may obtain videos or recordings of you from closed-circuit television (CCTV) cameras installed within the School's premises.

*Student Health Services (Clinic).* Your personal information will be obtained for maintenance of medical and dental records, annual physical examination and clinic consultation and medical treatment.

*On-the-job Training/ Internship and Exchange Program.* Your personal information may be collected for monitoring and assessment of on-the-job/ internship program, and for evaluation of application requirements and monitoring of cultural exchange program.

*Library Services.* The Learning Resource Center (LRC) may collect your personal information in relation to the use of library materials and facilities.

*Assessment Program, Evaluation, and Research Activities.* The Instructional and Performance Assessment (IPA) Office will obtain your personal information in understanding of assessment results whether emotional, behavioral and cognitive in nature, as well as in profiling of performance relevant to student's learning progress. The personal data will also be utilized for research and evaluation purposes.

***You have the option to choose which personal information you are comfortable to share with us. However, if you choose not to provide the personal information that we require, we may not be able to fully meet the legitimate education objectives provided by the School to its students.***

## **2. HOW DO WE USE INFORMATION ABOUT YOU?**

- 2.1 *Student Admission.* Your personal information, among others, your name, and sex assigned at birth, data and place of birth, citizenship, information about your family and other personal information that we use, along with other documents you provide will be used to verify your identity in the course of determining your eligibility to enrol in DLSZ.
- 2.2 *Academic and Non-Academic Services.* Your personal information will be used by DLSZ in the course of fulfilling its obligation to provide you quality education. Your personal information may also be processed in order to provide you with services (e.g. library services, dormitory, health service, performance assessment, psychological evaluation, counselling and guidance), determine whether the student organization or association to which you belong may be recognized and given access to School services, etc. pursuant to the School's contractual or legal obligations, or to protect your vitally important interests. Users of your personal information will be limited only to the School's duly authorized personnel, as part of their duties and responsibilities.
- 2.3 *Clinic Services.* Your personal information will be used by the School to determine your physical fitness to enrol and be able to provide you with the proper care when you avail of the School's health services or in case of an emergency. For instance, submission of medical certificates in order for your absences to be excused, for you to drop a subject, go on leave of absence, etc.
- 2.4 *Information Dissemination.* Contact information is processed by DLSZ in order to be able to communicate effectively with you and to enable us to contact your family members or other people you identify in the case of an emergency. DLSZ, through the Advancement and Communications Office (AdCom), or your teachers may use the information generated by the applicable registration system in order to contact you via email and/or SMS for class related and other academic matters. The School may also inform you of the need to contact certain DLSZ offices or to submit certain requirements by a certain date or otherwise disseminate information that you need to know by posting your name and other relevant personal information on campus bulletin boards in the Safety and Security Office and other Departments.

- 2.5 *Transportation Arrangements.* Your personal information will be utilized by our authorized transportation service provider to pick-up and transport you on the date, time, and location requested, and to appropriately charge transportation fees to your account.
- 2.6 *Accounting Purposes.* The School processes financial information related to your studies, e.g. tuition payments, scholarships, etc. pursuant to its contractual or legal obligations as part of the School's legitimate interests and that of taxpayers.
- 2.7 *Financial Audit.* In preparing our financial reports, we will or may provide documents or files that may bear your personal information to our external auditors, who are engaged to check for consistency, accuracy, and validity of our financial records.
- 2.8 *Information Technology (IT) Services.* Your personal information is collected and used to provide you with access to email and information systems, develop or employ system changes, and to provide various IT services such as troubleshooting of system errors and processing of IT requests.
- 2.9 *Accreditation/Certification Activities.* Your personal information may be collected to process accreditation or certification of the School's programs or services.
- 2.10 *Compliance activities.* Your personal information may be used to comply with contractual, organizational and regulatory requirements (e.g., submission of requirements to educational institutions and government agencies).
- 2.11 *Other activities.* We will use your personal information for monitoring purposes, records management, research studies, School programs/activities, marketing/promotion, recognition of achievements/celebrations, other services that you may avail, and other activities as deemed necessary to serve our business purpose.

### **3. HOW DO WE TRANSFER DATA ABOUT YOU?**

Your information may be shared through email or by any other means available by any of our authorized personnel across all campuses of De La Salle Santiago Zobel School and its affiliates in the Philippines, if deemed necessary for our business purpose, as listed below:

- De La Salle Philippines, Inc.
  - De La Salle Santiago Zobel School – Vermosa Campus
- 3.2 We may disclose your information to law enforcement, regulatory and other government agencies and to professional bodies and other third parties, as required by and/or in accordance with applicable laws or regulations. This may include disclosures outside the country, if necessary. As part of our commitment to protect your personal information, we will review and use your information to determine whether disclosure is required or permitted.
  - 3.3 The School ensures that personal information shared through email or by any other means available are protected with our IT or manual systems and controls in place to mitigate the risk of data breaches. We ensure you that all our employees across are well-informed of the Data Privacy Act and their responsibilities, particularly in sharing your personal information.

### **4. HOW DO WE STORE AND DISPOSE OF INFORMATION ABOUT YOU?**

- 4.1 We may retain your personal information in various forms such as paper file or electronic file. Only authorized personnel and yourself are allowed to access your personal information for privacy and security purposes. All of your personal information collected and documented in various official DLSZ Forms/Templates will be filed by the designated custodians in a locked storage room for the security and protection of your personal information. On the other hand, personal information in electronic forms will be retained in our computer systems which we have employed with information security controls.
- 4.2 We will keep your personal information in accordance with the school's policy on data retention or for as long as there are unsettled fees, required by laws or regulations, and/or it is needed for a relevant purpose as described in this Notice.

***After the retention period, the School is no longer responsible to keep and provide you with your personal information/documents. As authorized, our designated custodian will purge your personal information through shredding of paper files and/or deletion of electronic files in our computer system, or in any other manner which would prevent further processing of your personal information.***

## 5. WHAT ARE YOUR RIGHTS AS DATA SUBJECT?

The School acknowledges your rights as data subjects. Thus, students are entitled to perform any of the following:

- a. Request a copy of your information or access your information. The School will provide your request in a commonly portable format (e.g., printed copy of any soft copy files you have requested, a photocopy of the document you are requesting) for a span of **two (2) months from the date that the prescribed processing fee is paid.**

However, the School is not generally required to undertake endless and disproportionate searches for information in order to respond to a request and the School may refuse your request if:

- The relevant personal information is not in the School's possession or control
  - The request is identical or very similar to the one you have recently requested
  - The request is obviously unfounded or frivolous, and
  - Harm would arise or likely arise from disclosure, for example, if disclosure would be likely to prejudice a criminal investigation or prejudice someone's commercial interests
  - In case your request is declined, we will provide you a formal notification indicating the grounds of declining your request.
- b. Request for the correction/rectification or deletion of your information, provided that the information is/are not necessary for compliance with a regulatory obligation and it is not necessary to establish, exercise or defend legal claims.
  - c. Object/Restrict processing of your information, provided that personal information requested for restriction is not necessary for compliance with a regulatory obligation and it is not necessary to establish, exercise or defend legal claims. This right may be exercised upon discovery and substantial proof that personal information was obtained or processed unlawfully.
  - d. File a complaint with the National Privacy Commission (NPC) if any of the DPA provisions regarding security of your personal information, including your rights as data subjects, are violated.

For further knowledge and reference about your rights as data subjects and how you can exercise them, you may visit NPC's official website at <https://privacy.gov.ph/>.

## 6. HOW DO WE NOTIFY YOU IN CASE OF BREACH?

In the event your personal information is breached, we are prepared to follow any laws and regulations which would require us to notify you of such breach including the quality of information affected.

## 7. WHY DO YOU COMPLY WITH DATA PRIVACY CLAUSES ON CONTRACTS?

As our business partner, you are expected to comply with security related and privacy clauses that needs to be executed as part of our standard terms of business and/or contract(s).

## 8. HOW DO WE UPDATE YOU TO OUR PRIVACY POLICY STATEMENT?

We may amend this Privacy Policy from time to time and the updated version shall apply and supersede any and all previous versions. We will inform you through email to keep you up to-date of the changes in our privacy policy.

## 9. WHERE DO YOU GO FOR FURTHER INFORMATION?

If you have questions about how we use your information, you may contact our Data Protection Team headed Ms. Emma Cristobal, Data Protection Officer at [DataPrivacy@dlszobel.edu.ph](mailto:DataPrivacy@dlszobel.edu.ph) or at (02) 771-3579 local 128