

DATA PRIVACY STATEMENT

The **CONCORDIA COLLEGE, INC.** (henceforth, "School"), a non-stock, non-profit educational institution duly accredited by the Department of Education, recognizes and affirms its responsibility as Personal Information Controller ("PIC") under Republic Act No. 10173, known as the Data Privacy Act of 2012 ("DPA"), the Implementing Rules and Regulation of the DPA, and relevant data privacy issuances and regulation issued by the National Privacy Commission ("DPC"), relative to the processing (as this term is defined in the DPA) of personal information and sensitive personal information (collectively, "Personal Data") of its data subjects, i.e., the members of its educational community (its students, teachers, officers, employees and staff, etc., each data subject referred to as Data Subject and collectively referred to per grouping or the entire group as Data Subjects).

This Data Privacy Statement describes what Personal Data is processed by the School, how it processes Personal Data, the purposes for which it processes such Personal Data, how it uses, stores and protects such data, and informs its Data Subject/s of their rights vis-à-vis the School as their PIC under the DPA. This form is meant as a stand-alone form or as part of a general consent form as a requirement for your child's enrollment.

The School will observe the principles of transparency, legitimate purpose and proportionality when it collects or processes your personal data. The School has in place organizational, physical and technical security measures to ensure the confidentiality and security of your personal data.

1. The Personal Data the School collects and how it collects such data: The School collects or processes information about your identity and your child's identity (your child being a student in the School) like his or her name, learner reference number, sex, image, birthdate, health, addresses and contact information. The School also collects or processes information about yours as well as your child's religious affiliation, educational attainment, proof of income, and information about your child's school history including schools previously attended and grades obtained, including any information regarding disciplinary matters, and for purposes of guidance counselling, which are sensitive personal information.

The School collects and processes your child's personal data at the time of enrollment when students (or their parents or guardians) fill out enrollment and other school forms during the course of the School Year. The school medical and dental staff also collect and process personal health or health related data of your child in the course of your child's medical or dental examination. Personal Data is collected and processed by the School in the course of your child's education or schooling for and including, among other things, grades and educational or disciplinary assessments, guidance and counselling, physical education, school yearbook and other publications in print, broadcast and online media. Your Personal Data (e.g., image, video) may also be collected through the School's CCTV system put in place to enhance security within the campus.

The online class will be conducted on **Google Meet or Congrea**. Parents who give their consent, as herein requested, will be provided through email the link where their child can access

and join the class online. They will also be provided with the meeting ID and meeting Password by email sent to their registered email address indicated in their child's enrollment form.

2. Why the School Processes or Collects Personal Data: The School collects and processes your Personal Data in order to enable the School to provide efficient and effective wholistic educational services to its students (and its other Stakeholders) to comply with contractual and legal obligations to its students and other stakeholders, and to comply with its multifarious statutory and regulation obligations as an educational institution. The data the School collects is used only for the specific and declared purposes necessary or incidental to applications, enrollment, delivery of academic or educational instruction and assessment, internal communications (among School officials), extra-curricular, and other purposes related thereto, including but not limited to, student assessment for educational and disciplinary purposes, physical and mental health, spiritual formation, improving teaching methods, surveys or studies to generate information and research for educational purposes, enhancing campus security, the promotion of the school as a center for academic excellence, social awareness, service to country, community and those in need, and for other lawful purposes related to these purposes. The School may disseminate information through manual, print, broadcast and virtual delivery systems, including email.

3. How Personal Data is Processed, Used and Kept Confidential and Secure: Your Personal Data is entered and stored in the School's data or Management Information System (MIS) and can be accessed only by duly authorized officers or employees of the School, who need access to such personal data in order to discharge their official duties. Such personal information may also be accessed by, or shared with, government agencies (e.g., the Department of Education or DepEd) in compliance with law and regulation to which the School is subject as a regulated entity, and only as to information required for the School to comply with applicable law and regulation. Such Personal Data may also be available to third parties pursuant to lawful order or process of a court of law or by law enforcement authority.

Hard copies of personal data are stored in a vault or storage areas accessible only to the custodian of such data. Soft copies of personal data are stored in the School's internal information network and work stations (laptops or table-top computers) that are password protected (containing at least 8 a combination of eight letters, number and characters [with at least 2 characters]) and accessible only to the duly designated user/s or custodian of such workstation/s or those officially authorized to access such personal data in the discharge of their contractual or legal responsibilities as officials or employees of the school. Such Personal Data is encrypted at rest and reasonable effects shall be undertaken to encrypt such data while in transit in the internet. The School shall not disclose your child's (or your own) personal data without your consent, unless such disclosure is required in the instances where your consent is not required for the processing or disclosure or sharing of such personal data (e.g., when it is required to enable the school to perform its legal or contractual obligations, when disclosure is made to government regulatory agencies as required by law or as required by regulation or when made in compliance with the writs and processes of judicial or law enforcement agencies).

In conjunction with the School's adoption of online or virtual learning, made particularly urgent and necessitated by the Covid-19 pandemic, the school has also secured cloud computing services (including providing virtual learning methods to its students as an alternative to in-school

face-to-face instructions) through the adoption of online educational delivery platforms. Such educational platforms require cloud computing services under which the cloud computing service provider itself acts as PIC. In such instances, the School shall take reasonable efforts to ensure that the cloud service provider has in place appropriate organizations, technical and physical security measures to ensure the confidentiality and security of the personal data that will be shared with it by the School (and its data subjects) for purposes of availing itself of the cloud service providers virtual educational platform. For privacy purposes, the recording of the virtual learning by students/parents, whether through a device internal to the workstation or device (laptop or mobile phone) they are using, or through an external video or voice recording device (a mobile phone or video or tape recorder) is strictly prohibited as it amounts to a violation of the right to privacy of others (other students). Participants are therefore enjoined to strictly adhere to respect the privacy of others. The school through its qualified personnel (teachers & administrators), however, may record and share video of the virtual class to qualified data subjects/ students/ parents who failed to attend classes for **valid reason** for purpose of viewing only **provided** the latter made the request in advance to the former. The recorded video can only be stored by the school for two weeks beginning from the actual recording of the virtual class and shall be deleted completely upon the lapse of the stated prescribed span of time. Alternatively, if recording is not possible, an asynchronous activity may be provided for the students.

The School promotes student participation in a wide range of school sponsored or school-related activities where their photographs, videos and other recorded materials may be captured. The School may opt to use these personal data in printed (in an official School publication or notification or in newspapers), broadcast (tv or radio) or virtual format (postings in the School's official website) to recognize student achievement in such activities, to announce their participation in such activities, provide information about the types of activities the School and its students engage in and their performance therein vis-à-vis other competitors, evaluation performance, promote the image of the school as an educational institution and to disseminate information to parents and the academic community.

4. Rights of Data Subjects: As data subject, you have the following rights as authorized under the DPA, the IRR and applicable issuances, rules and regulations: [a] right to withdraw consent to data processing; [b] right to be informed about the processing of your child's (or your own) personal data and the right to object to such processing and on how such personal data is processed; [c] right to access your child's or your personal data; [d] right to rectify, correct, amend or modify, such personal data; [e] right to erase or block such personal data; [f] right to indemnification if your child's or your own personal data is improperly or illegally used; [g] right to be represented by lawful heirs or assigns; [h] right to obtain copies of your child's or your own personal data.

Any inquiring regarding your rights as data subjects may be directed to our Data Privacy Officer Ms. Raquel H. Hablado (raquelhablado@laconcordia.edu.ph), who will be happy to answer your questions or attend to your concerns.