PANELCO III
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Mangaagsan Urdaneta City, Pangasinan

DATA PROTECTION POLICY

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DATA PROTECTION POLICY

Table of Contents

Context and Overview
Key details

- Approved by board / management on: 23 May 2025

Background

Republic Act No. 10173 entitled, "An Act Protecting Individual Personal Information in Information and Communications Systems in the Government and the Private Sector, creating for this Purpose a National Privacy Commission, and for Other Purposes", or simply, Data Privacy Act of 2012 (DPA), is the law that gives form to the declared policy of the State to protect the fundamental human right of privacy and communication. While the State recognizes the vital role of information and communications technology in nation-building, it also acknowledges its inherent obligation to ensure that personal information in information and communications systems in the government and the private sector are secured and protected.

The Act serves the following purposes:

1. Protects the privacy of individuals while ensuring free flow of information to promote innovation and growth;

2. Regulates the collection, recording, organization, storage, updating or modification, retrieval, consultation, use, consolidation, blocking, erasure, or destruction of personal data; and

3. Ensures that the Philippines complies with international standards set for data protection through the National Privacy Commission.

Introduction

PANGASINAN III ELECTRIC COOPERATIVE is committed to protecting the privacy, security, confidentiality, integrity, and availability of individual personal information (PI) and sensitive personal information (SPI) in compliance with the DPA of 2012, Its IRR, and Other Issuances. This Manual applies to PI and/or SPI collected, acquired, maintained, or disclosed by **PANGASINAN III ELECTRIC COOPERATIVE** member-customer-owners, employees, and vendors/suppliers.

PANGASINAN III ELECTRIC COOPERATIVE needs to gather and use certain information about individuals. These can include members, applicants, employees, employers, developers, suppliers, consultants, third-party or outsource providers, and other people the organization has a relationship with or may need to contact.

All individuals representing **PANGASINAN III ELECTRIC COOPERATIVE** will take responsibility for safeguarding personal information to which they have access. In addition, this Manual will develop and implement administrative, technical, and physical safeguards that will reasonably protect PI and/or SPI from intentional and unintentional uses or disclosures that may violate the Data Privacy Act of 2012. Moreover, the Manual will institute procedures to verify the identity of any person or entity requesting PI and/or SPI and the authority of that person or entity to have access to PI and/or SPI.

The Manual outlines **PANGASINAN III ELECTRIC COOPERATIVE** data protection and security measures and may guide the user in exercising their rights under the DPA.

This policy describes how personal data must be collected, handled, and stored to meet **PANGASINAN III ELECTRIC COOPERATIVE** data protection standards and comply with the DPA, its Implementing Rules and Regulations, and other related issuances and compliances.

Why this policy exists
This data protection policy ensures that **PANGASINAN III ELECTRIC COOPERATIVE:**

- Complies with the DPA, its IRR, and other related issuances and compliances and follows good practices and governance;
- Protects the rights of employees, member-customer-owners, vendors/suppliers, third-party or outsource; providers and other people the organization has a relationship with or may need to contact;
- Is transparent about how it stores and processes individuals' data; and
- Protects itself from the risks of a data breach

Data Privacy and Protection Law General Provisions
The DPA describes how organizations — including **PANGASINAN III ELECTRIC COOPERATIVE** - must collect, handle, store, process, use, and store personal information, including its disclosure, retention, and disposal.

These rules apply regardless of whether data is stored electronically, on paper, or in other materials.
To comply with the law, personal information must be collected and used fairly, stored safely, and not disclosed unlawfully.

The DPA is underpinned by eight important principles. These say that personal data must:

1. Be processed fairly and lawfully
2. Be obtained only for specific, lawful purposes
3. Be adequate, relevant, and not excessive

4. Be accurate and kept up to date
5. Not be held for any longer than necessary
6. Processed in accordance with the rights of data subjects
7. Be protected in appropriate ways

Definition of Terms
For purposes of this Policy, the following terms are herein defined as follows:

1. **Data Subject** – refers to an individual whose personal, sensitive personal, or privileged information is processed by **PANGASINAN III ELECTRIC COOPERATIVE.** It may refer to its officials, member-customer-owners, employees, and vendors/suppliers.

2. **Personal Data** - refers to all types of personal information.

3. **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.

4. **Personal Information** - refers to any information, whether recorded in a material form or not, from which an individual's identity 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.

5. **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 his behalf.

6. **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.

7. **Processing** - 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.

8. **Security Clearance** - a written document signed by the HR head with the approval of the General Manager issued to specific employees authorized to handle and/or access personal information.

9. **Sensitive personal information** refers to personal information:

    a. About an individual's race/ethnic origin, IDs issued by private companies that are duly registered with the Securities and Exchange Commission, student IDs for those who are not yet of voting age (below 18 years old), political association, philosophical beliefs, health records/ medical information (previous or current), sexual life/ preference / practice, age, gender, date of Birth, and nationality.
    b. About an individual's educational information, history, marital status, Payroll and benefits information, Government Loan Records, Internal Loan Records, 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;
    c. 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
    d. Specifically established by an executive order or an act of Congress to be kept classified.

PEOPLE, RISKS AND RESPONSIBILITIES

Policy scope
This Policy applies to:

- The head office of **PANGASINAN III ELECTRIC COOPERATIVE**
- All branches of **PANGASINAN III ELECTRIC COOPERATIVE**
- All employees, stakeholders of **PANGASINAN III ELECTRIC COOPERATIVE**
- All contractors, suppliers and other people working on behalf of/working for **PANGASINAN III ELECTRIC COOPERATIVE**

It applies to all data that the **PANGASINAN III ELECTRIC COOPERATIVE** holds relating to identifiable individuals. This may include but not limited to the following:

1. Name (not necessarily complete name - middle name would suffice)
2. Personal details (age, sex, gender, race, nationality, place of birth, address, contact information, name of spouse or relatives, etc.)
3. Photo, video, or audio of an individual
4. Identification Card or Number (government-issued ID, company ID, school ID, etc.)
5. Reference numbers or unique identifiers that can be traced to an individual (account number, transaction reference number, etc.)
6. Financial information (bank account number, credit card number, source of fund or income, deposit information, etc.)
7. Business or employment information (position, job description, contact information, salary, name of employer or business, nature of self-employment or business, etc.)
8. Device and network-related information (user credentials, cookie information, geolocation, MAC address, device ID, device type, browser type, OS type, IP address, plug-in details, etc.),
9. Educational information
10. Health information (vaccination record, medical record, health background, etc.)
11. Criminal Information (pending cases, offense committed, convictions, etc.)
12. Knowledge and Belief Information (religious affiliations, political views, etc.)
13. Letters and communications (between attorney and client / doctor and patient / spouses / religious ministers / public officers)
14. Other Personal Data that can be identified to a person

Data protection risks

This Policy helps to protect **PANGASINAN III ELECTRIC COOPERATIVE** from actual and/or imminent data security risks, including but not limited to:

- Breaches of confidentiality. For instance, information being given out inappropriately.
- Failing to offer choice. For instance, all individuals should be free to choose how **PANGASINAN III ELECTRIC COOPERATIVE** uses data relating to them.
- Reputational damage. For instance, **PANGASINAN III ELECTRIC COOPERATIVE** could suffer if hackers successfully gained access to personal data.

Responsibilities

Everyone who works for or with **PANGASINAN III ELECTRIC COOPERATIVE** has a responsibility for ensuring that personal data is collected, stored, and handled appropriately.

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

However, the following officers have key areas of responsibility, to wit:

- The Board of Directors is ultimately responsible for ensuring that **PANGASINAN III ELECTRIC COOPERATIVE** meets its legal obligations.
- The **Data Protection Officer (DPO) -** is primarily responsible for ensuring compliance with applicable laws and regulations for the protection of data privacy and security:

  To carry out this above-cited function, the DPO shall:

  a. Monitor the **PANGASINAN III ELECTRIC COOPERATIVE** compliance with the DPA, its IRR, issuances by the NPC, and other applicable laws and policies. For this purpose, he/she may:
     - ✓ Collect information to identify the processing operations, activities, measures, projects, programs, or systems of the PIC or PIP and maintain a record thereof;
     - ✓ Analyze and check the compliance of processing activities, including the issuance of security clearances to and compliance by third-party service providers;
     - ✓ Inform, advise, and issue recommendations to the PIC or PIP;
     - ✓ Ascertain renewal of accreditation necessary to maintain the required standards in personal data processing;
     - ✓ Advise the PIC or PIP as regards the necessity of executing a data sharing agreement with third parties, and ensure its compliance with the law;
     - ✓ Ensure the conduct of privacy impact assessment relative to activities, measures, projects, programs, or system of the PIC or PIP; and
     - ✓ Advise the PIC or PIP regarding complaints and/or the exercise by the data subject of their rights (e.g., request for information, clarifications, rectification, or deletion of personal data).

  b. Ensure proper data breach and security incident management by the PIC or PIP, including the latter preparation and submission to the NPC or reports and other documentation concerning incidents or data breaches within the prescribed period.

c. Ensure the conduct of Privacy Impact Assessments relative to activities, measures, projects, programs, or systems of **PANGASINAN III ELECTRIC COOPERATIVE;**

d. Inform and cultivate awareness on privacy and data protection within the organization of the PIC or PIP, including all relevant laws, rules and regulations and issuances of the NPC;

e. Advice the Head of Agency regarding the complaints and/or exercise by data subjects of their rights (e.g., requests for information, clarifications, rectification, or deletion of personal data);

f. Ensure proper data breach and security incident management by the **PANGASINAN III ELECTRIC COOPERATIVE,** including the preparation and submission to the NPC of reports and other documentation concerning security incidents or data breaches within the prescribed period;

g. Inform and cultivate awareness on privacy and data protection within the **PANGASINAN III ELECTRIC COOPERATIVE,** as well as relevant laws, rules and regulations and issuances of the NPC;

h. Advocate for the development, review and/or revision of policies, guidelines, projects and/or programs of the **PANGASINAN III ELECTRIC COOPERATIVE** in relation to privacy and data protection by adopting a privacy by design approach;

i. Cooperate, coordinate, and seek the advice of the NPC and other authorities in all matters concerning data privacy or security issues or concerns and the PIC or PIP;

j. Serve as the contact person of **PANGASINAN III ELECTRIC COOPERATIVE** vis-à-vis data subjects, the NPC, and other authorities in all matters concerning data privacy or security issues or concerns;

k. Cooperate, coordinate and seek the advice of the NPC regarding matters concerning data privacy and security; and

l. Perform other duties and tasks assigned by the Head of Agency that will further the interest of data privacy and security and uphold the rights of the data subjects.

General Staff Guidelines

- Persons covered under this Policy should keep all data secured, by taking sensible precautions and following the guidelines below. In particular, they must comply with the Information Security Policy its Standards Guidelines and Procedures.
- Only the staff allowed to access data are those covered under this policy and whose functions necessarily require them to access such data.
- Data should not be shared informally. When access to the information is required, provision of access to this information must be cleared through proper authority.
- **PANGASINAN III ELECTRIC COOPERATIVE** will provide training to all staff to help them understand their responsibilities in handling data.
- Personal data should not be disclosed to unauthorized persons, either within the organization or externally.
- Data should be regularly reviewed and updated if found to be out of date. If no longer required, it should be deleted and disposed of in accordance with these guidelines.
- All staff should seek assistance from their immediate supervisor, Compliance Officer for Privacy (COP), or the DPO if they are unsure about any aspect of data protection.

Guidelines:

Security

- **PANGASINAN III ELECTRIC COOPERATIVE** shall ensure that personal data is stored securely using modern software that is kept up-to-date.
- Access to personal data shall be limited to employees who have access, and appropriate security should be in place to avoid unauthorized sharing of information.
- Deleting personal data should be done safely such that the data is irrecoverable.
- Appropriate backup shall be in place.

Information on desks, screens, printers, and scanner

All **PANGASINAN III ELECTRIC COOPERATIVE** employees who handle personal data should take appropriate measures to protect against unauthorized disclosure, particularly when they are away from their desks. Documents containing personal data-should be locked away overnight, at weekends, and at other unattended times.

Care should also be taken when printing and scanning confidential documents to prevent unauthorized disclosure.

When working with personal data, employees should ensure the screens of their computers are always locked when left unattended.

Data Accuracy
The law requires **PANGASINAN III ELECTRIC COOPERATIVE** to take reasonable steps to ensure that data is kept accurate and up to date.

The more important it is that the personal data is accurate, the greater should be the effort of **PANGASINAN III ELECTRIC COOPERATIVE** to ensure its accuracy.

All the employees who work with data should be responsible for taking reasonable steps to ensure that data is kept as accurate and up to date as possible.

- Data will be stored in a few places, as necessary. The concerned staff should not create any unnecessary additional data sets.
- The concerned staff should take every opportunity to ensure that the data is updated, for instance, by confirming a stakeholder's details by phone call.
- **PANGASINAN III ELECTRIC COOPERATIVE** should find ways to make it convenient for data subjects to update the information under its custody. For instance, via **PANGASINAN III ELECTRIC COOPERATIVE** website or any available platform with proper security.
- Data should be updated as inaccuracies are discovered. For instance, a stored telephone number through which a member-customer-owners can no longer be reached should be removed from the database.

Data Subject Access Requests
All individuals who are the subject of personal data held by **PANGASINAN III ELECTRIC COOPERATIVE** are entitled to:

- Ask what information the company holds about them and why.
- Ask how to gain access to it.
- Be informed on how to keep it up to date.
- Be informed on how **PANGASINAN III ELECTRIC COOPERATIVE** is meeting its data protection obligations.

If an individual contacts the company requesting this information, this is called a subject access request.
Subject access requests from individuals should be made by email, addressed to the DPO at dpo@panelco3.com.ph. The DPO can supply a standard request form, which is optional to use.
The concerned department will always verify the identity of anyone making a subject access request before handing over any information.

Backups
Process owners must ensure that appropriate backup and system recovery measures are in place. Where backups are stored off-site, appropriate security measures must be taken

to protect against unauthorized disclosure or loss. Recovery procedures should be tested regularly.

Archiving / Removal of Personal Data

To ensure that personal data is kept for no longer than necessary, **PANGASINAN III ELECTRIC COOPERATIVE** shall put in place for each area where personal data is processed an archiving policy that will be reviewed regularly. The archiving policy shall consider what data should/must be retained, for how long, and why.

Providing Information

PANGASINAN III ELECTRIC COOPERATIVE aims to ensure that individuals are aware that their data is being processed, and that they understand:

- How the data is being used
- How to exercise their rights

To this end, **PANGASINAN III ELECTRIC COOPERATIVE** has a privacy notice, setting out how data relating to individuals is used.

Data Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data, **PANGASINAN III ELECTRIC COOPERATIVE** shall promptly assess the risk to people's rights and freedoms and, if appropriate, report the breach to the NPC and the affected data subjects.

Reporting

All members of **PANGASINAN III ELECTRIC COOPERATIVE**, especially the employees, and **PANGASINAN III ELECTRIC COOPERATIVE** Officials, have a duty to report any personal data loss, suspected loss, or unauthorized disclosure of any information asset to the DPO.

Processing of Personal Data

A. Collection

With the strong collaboration of the DPO and all the process owners, **PANGASINAN III ELECTRIC COOPERATIVE** shall collect only information which is adequate, relevant, suitable, necessary, and not excessive in relation to a declared and specified purpose.

The collection of both PI and/or SPI should be done through lawful means and for a lawful purpose and should be directly related and necessary to the fulfillment of **PANGASINAN III ELECTRIC COOPERATIVE** contractual obligations with its stakeholders.

PI and/or SPI of stakeholders are not limited to the full name, address and contact numbers, depending on the information collected by PIC. These are obtained without any hidden motive through the clients' filling up of official forms. These forms are essential in the provision of service to clients.

B. Use

Personal data is of no value to **PANGASINAN III ELECTRIC COOPERATIVE** unless it can be used. However, personal data is exposed to the greatest risk of loss, corruption, or theft when accessed and used:

- Personal data should not be shared informally. In particular, it should never be sent by email, as this form of communication is not secure.
- Data must be encrypted before being transferred electronically.
- Personal data should never be transferred outside of the country without the proper clearance from the DPO.
- Employees should not save copies of personal data to their personal devices. Always access and update the central copy of any data.

When using PI and/or SPI, **PANGASINAN III ELECTRIC COOPERATIVE** employees should exert reasonable efforts to limit the amount of PI and/or SPI used or disclosed to the minimum necessary in accordance with the proportionality principle.

The following standards apply to the use of PI and/or SPI:

1. **PANGASINAN III ELECTRIC COOPERATIVE** employees, member-customer-owners, vendors/suppliers should only have access to the amount and type of PI and/or SPI necessary to carry out their job duties, functions and responsibilities;
2. **PANGASINAN III ELECTRIC COOPERATIVE** limits access to, and use of, the protected PI and/or SPI of persons served in accordance with its business associate agreements with vendors and providers; and
3. **PANGASINAN III ELECTRIC COOPERATIVE** employees, member-customer-owners, vendors/suppliers should restrict their use, access and disclosure of PI and/or SPI to the minimum necessary.

Storage, Retention and Destruction Storage

These rules describe how and where data should be safely stored. Questions about storing physical records safely can be directed to the Departments/Units collecting data and storing electronic records in the IT Center.

When data is stored on paper, it should be kept in a secure place where unauthorized people cannot see it. **PANGASINAN III ELECTRIC COOPERATIVE** shall maintain a log from which it can be ascertained which file was accessed, including when, where, and by whom. Such log shall also indicate whether copies of the file were made. The DPO shall regularly review the log records, including all applicable procedures.

These guidelines also apply to data that is usually stored electronically but has been printed out for some reason and to documents that are maintained in hardcopies:

- When not being used, the paper or files should be kept in a locked drawer or filing cabinet.
- Employees should make sure paper and printouts are not left where unauthorized people could see them (i.e., on a printer or scanner).
- Data printouts should be shredded and disposed of securely when no longer required.

When data is stored electronically, it must be protected from unauthorized access, accidental deletion, and malicious hacking attempts:

- Digital files should be protected by strong passwords that are changed regularly and never shared among employees.
- If data is stored on removable media, (i.e. CD or DVD, USB, External Hard Drives, etc.), data should be kept locked away securely when not being used.
- Data should only be stored in designated storage and servers.
- Servers containing personal data should be sited in a secure location.
- Data should be backed up frequently. Backups should be tested regularly, in line with the **PANGASINAN III ELECTRIC COOPERATIVE** standard backup procedures.
- Data should never be saved directly to desktops, laptops or other mobile devices such as tablets or smartphones.
- All servers and computers containing data should be protected by approved security software and a firewall.

1. **PANGASINAN III ELECTRIC COOPERATIVE** shall ensure that documents containing PI and/or SPI should be stored appropriately to reduce the potential for incidental use or disclosure. Documents should not be easily accessible to any unauthorized employee or visitor.
2. Hardcopy records are maintained in a secure area that allows authorized employee access as needed and should be protected from loss, damage and destruction.
3. Records, whether in paper or digital formats, may be reviewed by authorized employee/s only through the issuance of a security clearance.

Authorized staff reviewing records should do so in accordance with the minimum necessary standards.

4. The authorized employee should review the record at the designated Records Information Management area workstation unless signed out in accordance with **PANGASINAN III ELECTRIC COOPERATIVE** procedures.
5. Hardcopy of records should not be left unattended in areas where person served, visitors and unauthorized individuals could easily view the records.
6. **PANGASINAN III ELECTRIC COOPERATIVE** shall implement stringent security measures in storing collected personal information, depending on the nature of the information.

If a storage facility/ equipment is required to be returned to a supplier or sold or donated, the storage system should be securely erased before being forwarded/returned unless contractual arrangements are in place with the former, which guarantees the secure handling of the equipment. If this is not possible, then the storage system should not be returned/forwarded and should remain in possession of **PANGASINAN III ELECTRIC COOPERATIVE** until disposed of securely.

Retention

1. The longer the period of retention, the more stringent the security that should be in place. **PANGASINAN III ELECTRIC COOPERATIVE** should not keep PI and/or SPI longer than necessary.
2. **PANGASINAN III ELECTRIC COOPERATIVE** should store the records, documents, and forms with PI and/or SPI until the retention period has expired based on the existing records policy and Records Disposition Schedule. Records should be stored securely and protected from unauthorized access and accidental/wrong destruction.
3. At the expiration of the retention period, the records should be destroyed in accordance with the provision of the **PANGASINAN III ELECTRIC COOPERATIVE** Records Disposition Schedule.
4. Records that may be used in pending litigation may be exempt from scheduled, as prescribed by the policy of **PANGASINAN III ELECTRIC COOPERATIVE.**
5. Retention period of records, documents and forms that collect PI and/or SPI should refer to the **PANGASINAN III ELECTRIC COOPERATIVE** Records Disposition Schedule (RDS) approved by the National Archives of the Philippines (NAP).

Destruction of hard copy

1. **PANGASINAN III ELECTRIC COOPERATIVE** shall adopt acceptable destruction methods, including shredding, incineration, and pulverization of personal data and shall be conducted according to the **PANGASINAN III ELECTRIC COOPERATIVE** Records Management Procedure. Records containing PI and/or SPI should not be thrown into an insecure trash receptacle.
2. A destruction log should be maintained by the Data Protection Officer and/or his/her designee to identify the destroyed records. At a minimum, the destruction log should capture the following information:
    a. The date of destruction.
    b. The name of the individual responsible for destroying the records.
    c. The name of the person who witnessed the destruction.
    d. The method used to destroy the records.
    e. Information about the person served (i.e. Name, Address, Gender, Birthdate, Birthplace, Telephone Numbers, etc.).
3. Prior to the destruction of the hardcopies, the Data Protection Officer should verify if the retention period has expired and other disposition requirements are met.
4. If the records are destroyed off-site through a destruction company, a Certificate of Destruction should be obtained attesting to destruction of the records.
5. Utmost care needs to be taken to ensure that information assets are disposed of securely.
6. Confidential paper waste must be disposed of in accordance with the circulars of the National Archive of the Philippines.
7. Electronic information must be securely erased or otherwise rendered inaccessible prior to leaving the possession of **PANGASINAN III ELECTRIC COOPERATIVE** unless the disposal is undertaken under contract by an approved contractor.
8. **PANGASINAN III ELECTRIC COOPERATIVE** should maintain destruction documents permanently.

Procedures for destruction of personal information in electronic means (Soft Copy):

Workstations, laptops, and servers use hard drives to store a wide variety of information. PI and/or SPI may be stored in a number of areas on a computer hard drive. For example, client information may be stored in "Folders" specifically designated for storing this type of information, in temporary storage areas and cache. Simply deleting the files or folders containing this information does not necessarily erase the data.

1. To make certain that the PI and/or SPI is totally disposed of, authorized personnel shall oversee the process and procedure in disposing of personal data.

2. Suppose the computer is being re-deployed internally or disposed of due to obsolescence. In that case, the software program/utility should be run against the computer's hard drive, after which the hard drive may be reformatted and a standard software image loaded on the reformatted drive.

3. Suppose the computer is being disposed of due to damage, and it is not possible to run the software program/utility to overwrite the data. In that case, the hard drive should be removed from the computer and physically destroyed. Alternatively, the drive can be erased by the use of a magnetic bulk eraser. This applies to PC workstations, laptops, and servers.

C. Access

PANGASINAN III ELECTRIC COOPERATIVE should implement procedures to ensure that unauthorized physical access to its electronic information systems and the locations in which they are housed is limited while ensuring that properly authorized access is allowed.

1. Unauthorized employees, member-customer-owners, vendors/suppliers who access PI and/or SPI or areas where PI and/or SPI may be accessed without being properly authorized pursuant to this procedure should be subject to administrative sanctions based on the existing Employee Code of Conduct.
2. The Administration Department Manager should implement procedures to control and validate individuals' access to facilities/locations based on their role or function.
3. The Administration Department Manager should issue a security clearance upon the recommendation of the Data Protection Officer and designate members of his/her staff who are authorized to access areas in which PI and/or SPI may be accessible. The individuals' security clearance should be reviewed and modified according to **PANGASINAN III ELECTRIC COOPERATIVE** procedures to review and modify access to PI.

D. Disclosure and Sharing

The **PANGASINAN III ELECTRIC COOPERATIVE** will limit its uses and disclosures of personal data as required by the Data Privacy Act of 2012, its IRR,

and Other Issuances. DPA prohibits disclosure of PI and/or SPI without written consent from the data subject.

The following are permitted uses and disclosures of PI and/or SPI under this Manual:

1. When the disclosure is to the individual is a requirement in a judicial proceeding.
2. When the use or disclosure is to carry out treatment, payment, or health care operations.
3. Whether personal/sensitive or privileged, no personal data shall be disclosed, shared without the data subject's consent.
4. For cases that the PI and/or SPI should be shared with the third party for any purpose, the Data Sharing Agreement and/or Outsourcing Agreement shall be forthwith be executed.

   In certain circumstances, the DPA allows personal data to be disclosed to law enforcement agencies without the consent of the data subject. Under these circumstances, **PANGASINAN III ELECTRIC COOPERATIVE** will disclose the requested data. However, the recipient will ensure that the request is legitimate by seeking guidance/advice/assistance by the General Manager, Chief Legal Counsel, or Head of Legal and General Counsel Group, when necessary.

E. EFFECTIVITY

This policy shall take effect upon approval by the Members of the Board of Directors. The implementation shall commence fifteen (15) days after posting.

This shall be made known to all employees.

F. REFERENCE

Approved and Adopted per Board Resolution No. 111-s-05-2025, A dated 23 May 2025.

Certified Correct:

ATTY. DEXTER ARTHUR T. NAVARRO
Board Secretary

Attested:

DIR. ROSELLE G. TEODOSIO
Board Chairperson