



11 November 2019

## **ADVISORY OPINION**

Reference No. DPO 19-52

FOR : [REDACTED]

SUBJECT : **Survey Questionnaire for** [REDACTED]

Dear [REDACTED]:

We respond to your request for guidance on how to proceed with data gathering and what data privacy statement should be included in the survey questionnaire on your study of indicators of accomplishments for [REDACTED] for 2019.

### **Personal information in the survey form**

We note that in addition to health information (physical or mental incapacity to work), educational information (college and degree program) are also sensitive personal information. Hence, consent should be obtained prior to the processing of data. We recommend that the act of obtaining consent be integrated in the survey form by having a consent statement at the end.

Since data will be aggregated and hence the identity of individuals will not be ascertained, then there is no processing of "personal" information (sensitive or otherwise) and hence the processing is permissible.

### **Survey form**

To grant the respondents their right to be informed of the nature, purpose and extent of the processing of their personal information, we recommend that the survey form begins with a notice indicating the *purpose* of the [REDACTED].

Since personal information (including sensitive personal information) will be collected, the following consent statement is recommended to be included at the end of the survey form:

I consent to the processing of the information I provided in this survey for the purpose of studying the performance of degree programs and

colleges in relation to employment. I consent to the processing of my information as long as the said study is not yet complete or as long as the Government's Inter-Agency Task Force on the Harmonization of National Government Performance Monitoring, Information and Reporting Systems or the Commission on Higher Education has questions regarding the study.

The first sentence of the above consent statement complies with the requirement that consent should be specific to the purpose of data processing. The second sentence complies with the requirement that consent should be time-bound.

For your guidance, along with this Advisory Opinion is your survey form with our marked-up suggested revisions.

### **Conduct in the study**

In the conduct of performing the study, we kindly remind the [REDACTED] to observe the [UP Diliman Data Subject Rights and Responsibilities](#) as well as the [UP Diliman Data Protection Guidelines for Work Processes](#). Copies of these documents can be found in the UP Diliman Privacy Portal at <https://upd.edu.ph/privacy>.

We hope we have addressed your request properly. Please feel free to reach out for further concerns.

Yours,

**(Sgd.) Elson B. Manahan**  
*Data Protection Officer*  
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