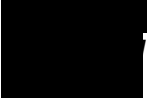




17 June 2020

**ADVISORY OPINION**

Reference No. DPO 20-10

FOR : 

SUBJECT : **Inquiry on Research Ethics**

Dear ,

We thank you for your attention to detail and being able to apply the Privacy Policy for Researchers and Research Subjects to real-world concerns.

Generally, research is exempted from the prohibitions of the law (Data Privacy Act, Section 4(d)). However, research is not covered only up to the extent that the data processed is to the minimum extent necessary to achieve the specific purpose of the research.

Anonymized data may be published. However, the National Privacy Commission made the following qualifications:

NPC Advisory Opinion No. 2017-027:

"Anonymized data, in its truest sense, is not considered as personal Information and thus, falls outside of the ambit of the DPA."

NPC Advisory Opinion No. 2018-068:

"Any information is considered anonymized if there is no possible means to identify the data subject, that is, the PIC and/or any other person are incapable of singling out an individual in a data set, from connecting two records within a data set (or between two separate data sets) and from any information in such dataset."

We also kindly note that the purpose of a research is to release a written output - published or not. Hence, we note that the consent of the research subjects in participating in the research includes consent to have the anonymized data included in the written output.

In any case, anonymization detaches the identity of the research subject from the written output and hence no consent is needed.

We hope we have addressed your concern. Thank you.

Regards,

**(Sgd.) Elson B. Manahan**  
*Data Protection Officer*  
University of the Philippines Diliman