

To avoid the burden of observing the rights of students as data subjects, it is also suggested that the researcher **does not carry out activities and does not take decisions regarding the students** based on the research.

The assisting graduate students and full-time staff of the [Redacted] who will have access to the documents containing personal information should be required to sign the attached Non-Disclosure and Outsourcing Agreement.

Discussion

The use, evaluation, and processing of personal

education information about them. The research output already discloses the education information that such individual studied at the UP Diliman [Redacted] at one point in the last seven (7) years.

However, there is no prohibition against disclosing aggregate or anonymized data. In fact, the [Redacted] from which the Philippine Data Privacy Act was based on does not consider data to be personal data if it cannot be linked to an individual due to aggregation or anonymization.⁸

The intended public benefit should be stated in the research output standards should be observed in the conduct of the research

Although the Data Privacy Act excludes research from its scope, its Implementing Rules and Regulations curiously imposes the following requirement in conducting research:

It is suggested that in addition to having a statement of its purpose, the research should state its intended public benefit⁹ such as identifying the

It is suggested that the researcher does not carry out activities and take decisions on the students based on the research

As data subjects,¹³ the students (to whom the information to be processed pertain to), as a

Disclosure Agreements to prohibit disclosure of not just personal information but all kinds of confidential information and trade secrets.