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Please do not hesitate to reach out for further questions or concerns.

Yours,

Elson Manahan
Data Protection Officer
University of the Philippines Diliman

22 January 2019

ADVISORY OPINION

Reference No. DPO 19-01

FOR : **[Redacted]**
[Redacted]

CC : **[Redacted]**
[Redacted]

SUBJECT : **Standard Reply to Organizations Requesting for a
list of graduating students or alumni**

Dear [Redacted]:

We received your 22 January 2019 email requesting for a review of your draft standard reply to organizations requesting for a list of our University's graduating students or alumni.

You are correct that we cannot provide educational information as this is sensitive personal information. We kindly note that unless we obtain the consent of our graduating students and alumni, we cannot send them job opportunities because this amounts to using their email address for purposes beyond the *mandate* of our University.

The relevant rule is Section 22(d) of the Implementing Rules and Regulations of the Data Privacy Act of 2012 which states:

because PAO is already acting beyond its *mandate*. Similarly, it is beyond our University's mandate to refer potential employers or headhunters to our graduating students and alumni.

Also, referring potential employers to students may unduly consume the time and resources of our government-employed staff for the benefit of private interests.

We suggest the following standard reply:

"Dear _____:

We appreciate your interest in the quality of our students and alumni. However, we cannot grant your requested educational information as it is classified as **sensitive personal information** under the Data Privacy Act of 2012 which is prohibited to be disclosed save for certain exceptions. Also, as a government institution, we can only process sensitive personal information for noncommercial objectives."

Please feel free to reach out for further questions or concerns.

Yours,

Elson Manahan
Data Protection Officer
University of the Philippines Diliman