



Data Protection Team

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**ADVISORY OPINION**

Reference No. DPO 19-05

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

SUBJECT : **Requested Information for Project**

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Dear [Redacted]:

We respond to your request for guidance on the personal information requested by the [Redacted] for its research entitled [Redacted]. This research is endorsed by the Commission on Higher Education (CHED).

The following information of freshmen and graduating students are requested: <sup>1</sup>

Student number

## **Discussion**

### ***I. Effect of processing of information by a private institution***

It should be noted that while CHED endorsed the research, it is [Redacted] – a *private* Higher Education Institution – which is the *Personal Information Controller*.<sup>2</sup> CHED's exemption to the processing of information to carry out its functions as a public authority<sup>3</sup> does not extend to [Redacted].

Although [Redacted] is a private institution, UP Diliman *may provide* a list of its undergraduate degree programs because these are public non-personal information.<sup>4</sup>

### ***II. Minimally necessary information for research purposes are exempt from the Data Privacy Act's prohibitions against disclosure***

The Data Privacy Act does not apply to personal information processed for research purposes<sup>5</sup> if the following requirements are met:

*First*, the research is “intended for a public benefit”;<sup>6</sup> and

*Second*, the information is processed “only to the minimum extent necessary to achieve the purpose for which it is collected.”<sup>7</sup>

The **student number** is minimally necessary to the research because an “online survey of