

Registration of Personal Data Processing Systems



A **data processing system** refers to the structure and procedure by which personal data is collected and processed in an information and communications system, or any other relevant filing system. It includes the purpose and intended output of the processing.

Who are required to register their personal data processing systems?



The registration of personal data processing systems operating in the Philippines is required for PIC and PIPs, whether in the government or in the private sector, if:

- The processing involves sensitive personal information of at least one thousand (1,000) individuals;
- The PIC or PIP employs at least two hundred fifty (250) persons; or
- The PIC or PIP employs less than two hundred fifty (250) persons but the processing is not occasional or the processing it carries out is likely to pose a risk to the rights and freedoms of data subjects.

What are the contents of the application for registration?

An application for registration shall include the following information:

1. Name and address of the personal information controller or personal information processor, and of its representative, if any, including their contact details;
2. Purpose/s of the processing, and whether processing is being done under an outsourcing or subcontracting agreement;
3. Description of the category or categories of data subjects, and of the data or categories of data relating to them;
4. Recipients or categories of recipients to whom the data might be disclosed;
5. Proposed transfers of personal data outside the Philippines, if applicable;
6. General description of privacy and security measures for data protection;
7. Brief description of the data processing system;
8. Copy of all policies relating to data governance, data privacy, and information security;
9. Attestation to all certifications attained that are related to information and communications processing; and
10. Name and contact details of the data protection or compliance officer, which shall be updated immediately in case of changes.

