

Colegio de San Juan de Letran Calamba

DATA PRIVACY NOTICE

Effective Date: 15 August 2026

Supersedes: Data Privacy Notice dated 15 July 2024



Welcome to Colegio de San Juan de Letran Calamba (“Letran Calamba,” the “Colegio,” “we,” “our,” or “us”).

The Colegio is committed to protecting the privacy and security of the personal information entrusted to us by our stakeholders. We process personal information in accordance with Republic Act No. 10173, otherwise known as the **Data Privacy Act of 2012** (“DPA”), its Implementing Rules and Regulations, applicable issuances of the National Privacy Commission (“NPC”), and other relevant laws and regulations.

This Data Privacy Notice explains how the Colegio collects, records, organizes, stores, updates, retrieves, uses, shares, retains, and securely disposes of personal information in the course of carrying out its educational, administrative, employment, research, institutional, and other legitimate functions.

This Notice should be read together with applicable consent forms, specific privacy notices, institutional policies, and other privacy-related notices that may be provided for particular processing activities.

WHO ARE OUR DATA SUBJECTS?

The Colegio may process personal information relating to:

- Applicants and prospective learners;
- Learners and students;
- Parents and legal guardians;
- Scholarship applicants and beneficiaries;
- Faculty members;
- Administrative and non-teaching personnel;
- Job applicants;
- Consultants, contractors, and service personnel;
- Alumni;
- Researchers and research participants;
- Visitors and guests;
- Suppliers, partners, and other third parties; and
- Other individuals whose personal information is lawfully provided to or collected by the Colegio.

WHAT PERSONAL INFORMATION DO WE COLLECT?

Depending on the nature of your relationship or interaction with the Colegio, we may collect and process the following categories of personal information:

Basic and Contact Information

- Full name;
- Student, employee, applicant, or identification number;
- Address;
- Telephone and mobile numbers;
- Email address;
- Date and place of birth;
- Age;
- Sex or gender;
- Nationality and citizenship;
- Civil status, where applicable;
- Photograph;
- Signature; and
- Emergency contact information.

Academic and Educational Information - For learners, applicants, and other education-related stakeholders:

- Previous schools attended;
- Academic qualifications;
- Grades and academic performance;
- Attendance records;
- Enrollment and registration information;
- Course and class information;
- Academic awards and achievements;
- Scholarship information;
- Student organization and extracurricular participation;
- Internship and practicum information;
- Disciplinary records;
- Guidance and counseling records; and
- Other information necessary for academic administration and student services.

Employment and Personnel Information - For personnel and applicants:

- Employment history;
- Educational background;
- Professional licenses and certifications;
- Position and department;
- Employment status;
- Performance evaluations;
- Training and development records;
- Attendance and leave records;
- Payroll and benefits information;
- Government-mandated identification and contribution information;
- Medical information, where necessary;
- Administrative and disciplinary records; and
- Other information necessary for employment and personnel administration.

Financial and Transaction Information - Where necessary for legitimate institutional functions:

- Scholarship and financial assistance information;
- Billing and payment records;
- Bank and payment information;
- Financial documents;
- Tuition and other school-related obligations;
- Payroll information; and
- Other information necessary to process financial or contractual transactions.

Health and Other Sensitive Personal Information - Where necessary and permitted by law, the Colegio may process sensitive personal information, including:

- Health and medical records;
- Disability information;
- Psychological or counseling records;
- Government-issued identification information;
- Tax information;
- Biometric information;
- Religious affiliation or information, where necessary for legitimate institutional purposes; and
- Information relating to disciplinary or administrative proceedings.
- Sensitive personal information shall only be processed when a lawful basis under applicable law exists and appropriate safeguards are implemented.

Digital, Technical, and Security Information - The Colegio may also process information generated through the use of its facilities, systems, and digital platforms, including:

- Learning Management System activity;
- Student and Human Resource Information System records;
- Official email and communication platform usage;
- Microsoft 365 or other institutional collaboration platform activity;
- Internet and network access logs;
- Access-control and building entry records;
- Biometric attendance records, where applicable;
- Assigned institutional devices and equipment;
- CCTV recordings;
- Visitor logs;
- Online class and webinar recordings;
- Audio, video, chat, screen-sharing, and similar information generated during virtual activities; and
- Other technical information necessary for the operation, security, and administration of Colegio systems.

HOW DO WE COLLECT PERSONAL INFORMATION?

Personal information may be collected directly from you or from other lawful sources, including:

- Application and enrollment forms;
- Employment applications and personnel records;

- Official Colegio systems and platforms;
- Academic and administrative transactions;
- Surveys and research activities;
- Official events and activities;
- CCTV and access-control systems;
- Authorized representatives, including parents or legal guardians where applicable;
- Government agencies and regulatory bodies;
- Authorized service providers and partners;
- References and verification sources, where applicable; and
- Other sources where collection is lawful and necessary for a declared purpose.

The Colegio does not consider the mere receipt of personal information as unrestricted authority to use it for any purpose. Personal information received unsolicited shall be assessed and handled in accordance with applicable law and the Colegio's privacy and records management policies.

PURPOSES AND LAWFUL BASES FOR PROCESSING

The Colegio processes personal information only for declared, specified, and legitimate purposes and in accordance with the principles of transparency, legitimate purpose, and proportionality.

Depending on the particular processing activity, the Colegio may rely on one or more lawful bases recognized under the DPA, including:

- Consent of the data subject;
- Fulfillment of a contract or steps taken prior to entering into a contract;
- Compliance with a legal obligation;
- Protection of vital interests;
- Compliance with requirements of public order and safety or the fulfillment of functions of public authority, where applicable; and
- Legitimate interests of the Colegio or a third party, provided that such interests are not overridden by the fundamental rights and freedoms of the data subject.
- Consent shall not be required where another lawful basis under the DPA applies.

Admission, Enrollment, and Academic Administration - Personal information may be processed to:

- Evaluate and process admission applications;
- Facilitate enrollment and registration;
- Maintain academic records;
- Process grades and attendance;
- Manage classes, schedules, and academic requirements;
- Issue IDs, certificates, transcripts, diplomas, and other academic records;
- Process graduation and honors;
- Facilitate scholarships and financial assistance;
- Administer internships, practicums, competitions, and educational activities; and
- Comply with applicable educational and regulatory requirements.

Student Services - Personal information may be processed to provide:

- Guidance and counseling services;
- Health and clinic services;
- Library services;

- Student affairs services;
- Campus ministry and formation activities;
- Athletics and recreation;
- Transportation and campus mobility services;
- Student organization services;
- Safety and security services; and
- Other legitimate student services.

Employment and Personnel Administration - For personnel and applicants, personal information may be processed for:

- Recruitment and hiring;
- Appointment and employment administration;
- Payroll and benefits;
- Government contributions and statutory reporting;
- Attendance and leave administration;
- Performance management;
- Training and professional development;
- Promotion and career development;
- Administrative investigations and disciplinary processes;
- Workplace health and safety;
- Institutional communication;
- Separation, clearance, and final pay processing; and
- Other legitimate employment-related purposes.

Institutional Operations and Security - Personal information may be processed to:

- Control access to Colegio facilities;
- Monitor and protect institutional resources;
- Maintain information and cybersecurity;
- Respond to emergencies;
- Investigate incidents;
- Maintain business continuity;
- Protect persons, property, and information assets;
- Comply with institutional policies; and
- Conduct audits and other legitimate institutional activities.

Monitoring of Colegio ICT Resources

The Colegio may monitor the use of Colegio-owned or Colegio-managed information and communication technology resources, including official email accounts, network and internet usage, institutional systems, collaboration platforms, and Colegio-issued devices.

Such monitoring shall be conducted only for legitimate business, operational, security, compliance, audit, and investigative purposes and shall be subject to applicable laws, institutional policies, and appropriate safeguards.

Research and Institutional Studies - The Colegio may process personal information for duly approved academic, institutional, administrative, operational, quality assurance, and other legitimate research activities. These may include:

- Faculty and student research;
- Institutional research;
- Program evaluation;

- Quality assurance;
- Accreditation;
- Policy development;
- Workforce planning;
- Educational research; and
- Statistical and historical analysis.

Research activities shall be subject to applicable laws, institutional approval requirements, ethical safeguards where applicable, and appropriate privacy protections. Whenever practicable, personal information shall be anonymized or pseudonymized before analysis, publication, or dissemination.

Where consent is the applicable lawful basis, the Colegio shall obtain the appropriate consent of the data subject.

Photography, Video, and Audio Recording - During official academic, co-curricular, extracurricular, institutional, and other Colegio activities, photographs, audio recordings, and video recordings may be taken for legitimate purposes such as:

- Documentation;
- Historical and institutional archives;
- Educational activities;
- Accreditation and quality assurance;
- Institutional reports;
- Official publications;
- News and communications;
- Official websites and social media platforms; and
- Promotional materials.

Where a particular activity requires consent as the applicable lawful basis, the Colegio shall obtain the appropriate consent.

Online and Digital Learning

The Colegio may use learning management systems, video conferencing platforms, online assessment tools, institutional email, and other educational technologies to facilitate teaching, learning, assessment, communication, and related institutional activities.

Online classes, webinars, and other virtual activities may be recorded where necessary for legitimate educational or institutional purposes. Where recording involves a processing activity requiring specific consent, the appropriate consent shall be obtained.

DISCLOSURE AND SHARING OF PERSONAL INFORMATION

Personal information may be disclosed or shared only when necessary and pursuant to a lawful basis.

Recipients or classes of recipients may include:

Internal Offices and Authorized Personnel

Authorized offices and personnel of the Colegio, including academic units, Registrar, Finance and Accounting, Human Resources Department, Student Services, Guidance, Clinic, Information Technology, Research, Quality Management, Security, Data Protection, and other offices with a legitimate need to access the information.

Parents and Legal Guardians

For learners who are minors, parents or legal guardians may act in accordance with applicable law.

For learners who are eighteen (18) years of age or older, relevant academic, enrollment, scholarship, billing, payment, and other student records may be disclosed to a parent or legal guardian when expressly authorized by the learner or when otherwise permitted or required by law or institutional policy.

Government Agencies and Regulatory Bodies

Personal information may be disclosed to government agencies, regulators, courts, law enforcement authorities, and other public authorities when required or authorized by law.

Service Providers and Personal Information Processors - The Colegio may engage service providers to support its operations, including providers of:

- Cloud and hosting services;
- Learning management systems;
- HRIS and payroll systems;
- Email and collaboration platforms;
- Payment processing;
- Identity verification;
- Insurance and HMO services;
- Information technology and cybersecurity;
- Document management;
- Courier and logistics; and
- Other legitimate institutional services.
- Such providers shall be subject to appropriate contractual, organizational, physical, and technical safeguards.

Partner Institutions and Organizations

Where necessary and lawful, personal information may be shared with partner schools, internship and practicum partners, scholarship providers, professional organizations, accrediting bodies, research collaborators, and other organizations involved in legitimate educational or institutional activities.

INTERNATIONAL OR CROSS-BORDER PROCESSING

Some Colegio systems and service providers may store or process personal information using cloud-based or other technologies located outside the Philippines.

Where personal information is processed through such services, the Colegio shall implement appropriate contractual, organizational, physical, and technical safeguards and shall remain accountable for the personal information entrusted to it in accordance with applicable law.

AUTOMATED PROCESSING AND PROFILING

The Colegio may use automated systems to support administrative, academic, security, or operational functions.

Where automated processing or profiling is used in a manner that may significantly affect a data subject, the Colegio shall provide appropriate information regarding the processing and implement safeguards required by applicable law.

Unless otherwise disclosed in a specific privacy notice, the Colegio does not use automated processing as the sole basis for decisions that significantly affect data subjects.

STORAGE AND SECURITY OF PERSONAL INFORMATION

The Colegio implements reasonable and appropriate organizational, physical, and technical measures to protect personal information against accidental or unlawful destruction, alteration, disclosure, access, or other unlawful processing.

These measures may include:

Organizational Measures

- Data Privacy and security policies;
- Confidentiality obligations;
- Role-based access controls;
- Personnel training;
- Incident response procedures;
- Privacy Impact Assessments, where appropriate;
- Records management procedures; and
- Regular review of privacy and security practices.

Physical Measures

- Restricted-access offices;
- Locked filing cabinets and records storage;
- Visitor controls;
- Secure disposal facilities; and
- Physical security controls.

Technical Measures

- Authentication and access controls;
- Encryption where applicable;
- Secure servers and systems;
- Backup and recovery mechanisms;
- Firewalls;
- Anti-malware protection;
- Audit logs;
- Multi-factor authentication where applicable; and
- Other appropriate information security controls.

Access to personal information is limited to authorized persons who require such access for legitimate and lawful purposes.

RETENTION AND DISPOSAL

The Colegio retains personal information only for as long as necessary to fulfill the declared and legitimate purposes for which it was collected, or for as long as required or permitted by applicable laws, regulations, institutional policies, contractual obligations, and the Colegio's Records Retention Schedule.

Certain academic, historical, statistical, or institutional records may be retained for longer periods where there is a legitimate and lawful basis for such retention.

When personal information is no longer necessary or legally required to be retained, it shall be securely disposed of, deleted, anonymized, or otherwise rendered inaccessible in accordance with applicable policies and procedures.

Retention periods may vary depending on the type of record and the applicable legal or institutional requirements.

DATA SUBJECT RIGHTS

Subject to applicable laws and limitations, data subjects have the following rights:

Right to be Informed - To be informed about whether and how their personal information is being processed.

Right to Access - To obtain reasonable access to personal information concerning them, subject to applicable limitations.

Right to Rectification - To dispute inaccuracies or errors and request correction of inaccurate or incomplete personal information.

Right to Object - To object to certain processing activities, including processing based on consent or legitimate interest, where applicable.

Right to Erasure or Blocking - To request the removal, blocking, or destruction of personal information when permitted under applicable law.

Right to Data Portability - To obtain a copy of personal information in an electronic or structured format where the right applies.

Right to Damages - To seek indemnification for damages sustained due to unlawful or unauthorized processing, subject to applicable law.

Right to Lodge a Complaint - To file a complaint with the National Privacy Commission when a data subject believes that their rights have been violated.

Certain rights may be subject to limitations provided by law, including limitations applicable to research, investigations, legal proceedings, or other lawful processing activities.

WITHDRAWAL OF CONSENT

Where processing is based on consent, a data subject may withdraw such consent by contacting the Colegio's Data Protection Officer.

Withdrawal of consent shall not affect the lawfulness of processing undertaken before the withdrawal and shall not prevent the Colegio from continuing processing where another lawful basis under applicable law exists.

EXERCISE OF DATA SUBJECT RIGHTS AND PRIVACY REQUESTS

Requests concerning access, correction, objection, erasure, data portability, withdrawal of consent, or other privacy concerns may be submitted to the Colegio's Data Protection Officer.

The Colegio may request reasonable information or supporting documentation necessary to verify the identity and authority of the requesting individual and to properly process the request.

Requests shall be handled in accordance with applicable laws, NPC issuances, and the Colegio's internal procedures.

DATA PRIVACY INCIDENTS AND BREACHES

The Colegio maintains procedures for identifying, managing, documenting, and responding to personal data breaches and other privacy incidents.

Where notification is required under applicable law or NPC issuances, affected data subjects and the National Privacy Commission shall be notified within the prescribed period and in the manner required by law.

DATA PROTECTION OFFICER

The Colegio has designated a Data Protection Officer who oversees the Colegio's data privacy and protection program and serves as a point of contact for data subjects and the National Privacy Commission.

Data Protection Officer (DPO)

Colegio de San Juan de Letran Calamba

Email: dpo@letran-calamba.edu.ph

For privacy-related questions, requests, or concerns, you may contact the Data Protection Officer through the email address above.

You may also lodge a complaint directly with the National Privacy Commission when you believe your data privacy rights have been violated.

CHANGES TO THIS DATA PRIVACY NOTICE

The Colegio may update this Data Privacy Notice from time to time to reflect changes in applicable laws, regulations, NPC issuances, institutional practices, technologies, systems, or processing activities.

When material changes are made, the Colegio shall provide appropriate notice and, where required by law, obtain the necessary consent or provide the data subject with an opportunity to exercise applicable rights.

The Colegio shall maintain appropriate records of previous versions of this Notice.

Effective Date: 15 August 2026

Last Updated: 13 August 2026

Data Protection Unit
Colegio de San Juan de Letran Calamba