# GPA Global Privacy and Data Protection Awards 2023

## Entry Form

To submit an entry to the GPA Global Privacy and Data Protection Awards please complete and email this form to secretariat@globalprivacyassembly.org **no later than 9 June 2023.**

Note: GPA member authorities can submit as many entries as they wish, but a separate form should be used for each different entry, submitted by the deadline above.

Languages: The GPA documentation Rule 6.2[1] applies.

## 1. CONTACT DETAILS FOR THIS ENTRY

| | | |
|---|---|---|
| Privacy/Data Protection Authority: | NATIONAL PRIVACY COMMISSION | |
| Person completing this form: | RAINIER ANTHONY<br>*First name* | MILANES<br>*Last name* |
| Job title: | CHIEF, COMPLIANCE AND MONITORING DIVISION | |
| Email address: | rainier.milanes@privacy.gov.ph | |

## 2. ELIGIBILITY

By submitting this entry, I confirm that (*please tick all boxes to confirm)*:

☒ The Authority is a member of the Global Privacy Assembly

☒ The initiative described in this entry was undertaken since January 2022.

☒ I am aware that the information in the entry (other than the contact details in 1(a) above) will be publicised by the GPA Secretariat.

## 3. CATEGORIES

Please indicate which category you wish to enter.

*Please tick **one;** please use a separate form for each category you wish to enter:*

☐ Education and Public Awareness

☐ Accountability

☐ Dispute Resolution and Enforcement

☒ Innovation

[1] GPA Rules and Procedures, Rule 6.2 'Assembly documents':
Without prejudice to section 4.2, Assembly documents, including accreditation and observer applications may be submitted in English or in another language. In the latter case, the documents shall be accompanied by an English version. Members with the ability and the resources to do so are encouraged to translate proposed resolutions and other Assembly documents such as the Assembly Rules and Procedures.

☐ People's Choice

## 4. DESCRIPTION OF THE INITIATIVE

**a. Please provide a brief summary of the initiative** *(no more than 75 words)*

The Data Breach Notification Management System is a custom-built, web-based application developed for managing Data Breach Notifications and Annual Security Incident Reports received by the Commission. It provides an efficient manner of receiving and evaluating notifications through an assessment tool for Personal Information Controllers as well as real-time updates of status of these cases through notifications via emails and the System. It also provides for real time transmittal of evaluation reports for review and approval.

**b. Please provide a full description of the initiative** *(no more than 350 words)*

The Data Breach Notification Management System ("DBNMS") is a custom-built, web-based application developed for the management of data breach notifications ("BN") and Annual Security Incident Reports ("ASIR") received by the Commission. The development was initiated by the Compliance and Monitoring Division ("CMD") of the National Privacy Commission in 2021 and was implemented in 2022.

It is an online portal where Personal Information Controllers ("PIC") may submit their BNs if a personal data breach meets all the requisites of mandatory notification. Likewise, PICs and Personal Information Processors ("PIP") may also submit their ASIRs for other security incidents involving personal data including personal data breaches not falling under the previous category.

To make it easier for PICs to determine whether the incident falls under mandatory notification, the DBNMS has an assessment tool. This tool prevents PICs to submit BNs are not reportable and eventually clog the dockets of the Commission. Moreover, fields for BNs and ASIRs have tool tips to guide PICs and PIPs in accomplishing these and ensure correct and complete submissions. This reduces submission of incomplete notification and the provision of information that are not relevant and responsive to the information required under the Circular on Personal Data Breach Management.

Once a BN is submitted in the DBNMS, it is automatically docketed and assigned a docket number for reference. The CMD personnel tasked to assign BNs for evaluation is also notified through email plus an in-app notification. It also applies to personnel assigned to evaluate, review, and approve these. This twin-notification method ensures that the personnel assigned are notified and BNs are acted without delay.

Once evaluated, the status is reflected real time to all authorized users including the PIC. When an Order is issued, the latter is notified through a system-generated email and in-app notification of that fact and the Order may be viewed and downloaded in the DBNMS. The service through email and the DBNMS was implemented to ensure real time service of Orders from the Commission and prevent the occurrence of missent emails and unauthorized and premature disclosure of Orders.

**c. Please explain why you think the initiative deserves to be recognised by an award** *(no more than 200 words)*

The Data Breach Notification Management System ("DBNMS") deserves to be recognized as it embodies privacy principles and considers, as paramount, the interest of data subjects especially those affected by security incidents.

Since its development, the DBNMS has been following industry best practices in privacy and software development such as Privacy by Design and DevSecOps. Hence, the implementation of user-based access controls and system-generated email coupled by in-app notification to prevent security incidents related to emails.

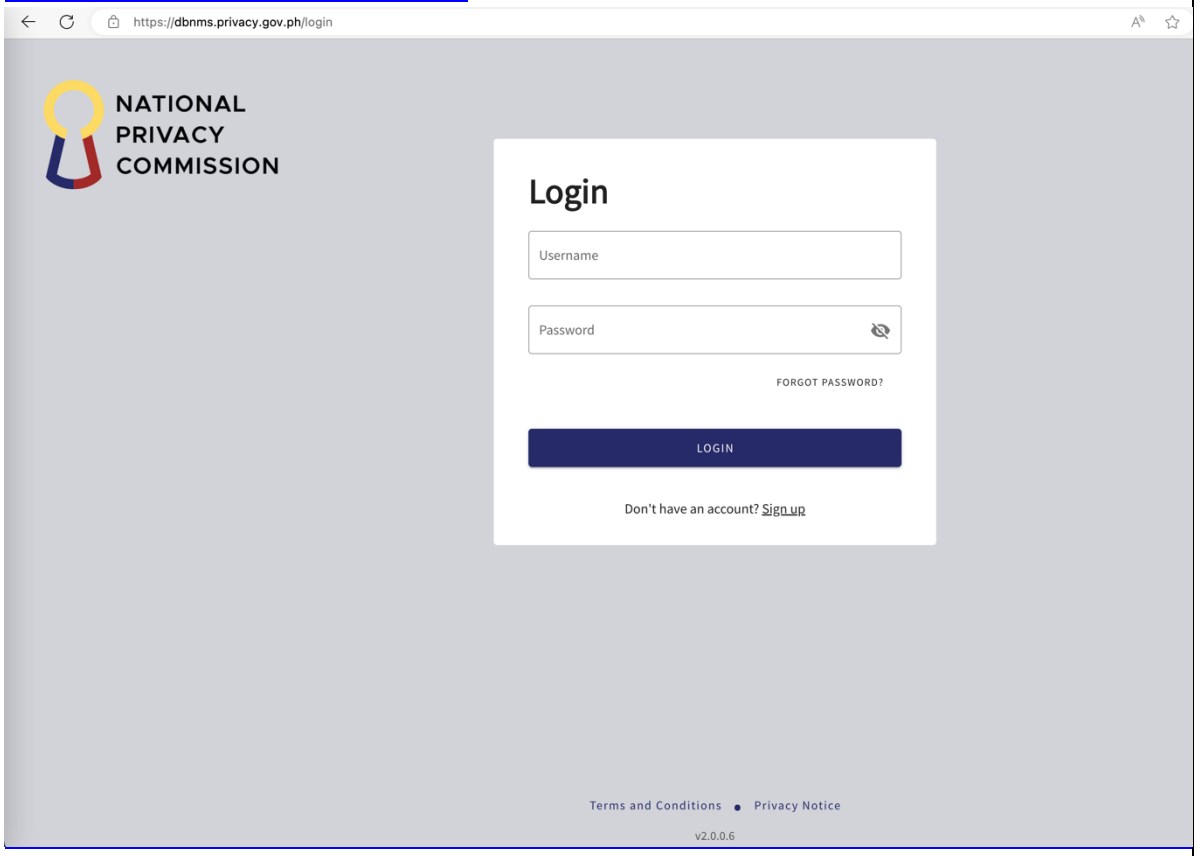
The DBNMS also ensures continuity of the service rendered by the National Privacy Commission even in case of health and other national emergencies by providing an online mechanism for reporting and evaluation.

Moreover, the DBNMS has increased awareness and understanding on data breach and security incident reporting through the tools provided to its users. It also increased the efficiency and effectiveness of reporting by ensuring that notifications are submitted completely and only those that are required to be notified are submitted to the Commission. Hence, the burden of weeding out invalid notifications are done away.

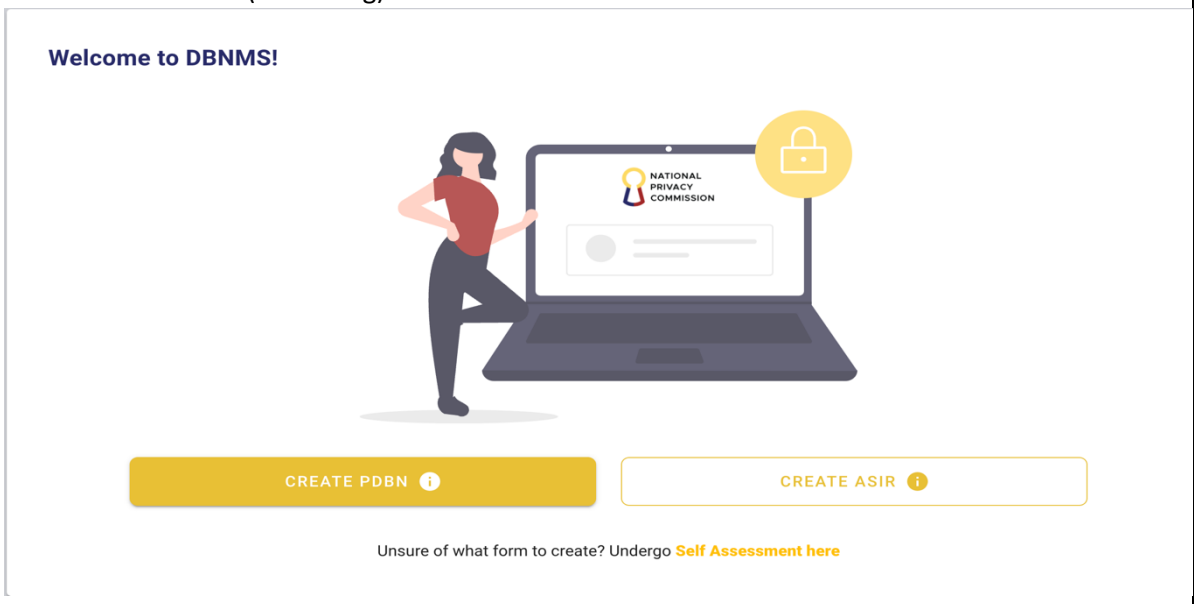
Lastly, the efficient generation of data through the system will make it easier for the Commission to come up with better standards on privacy that ultimately protect the data subjects.

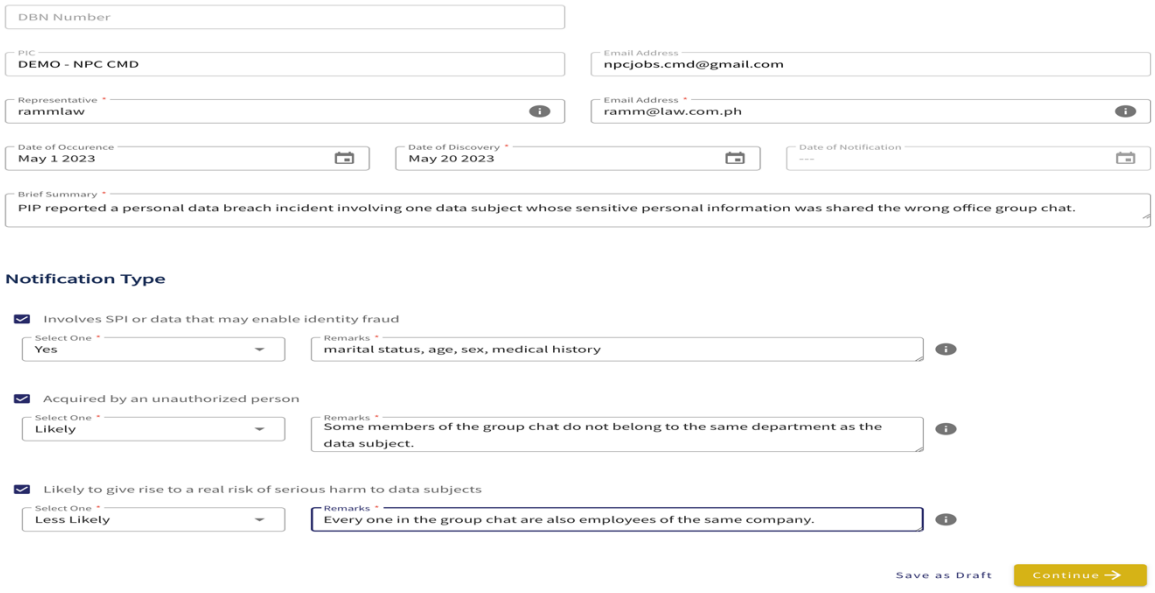
**d. Please include a photograph or image, if you wish** *(This will be published with your entry on the GPA website. The image can be pasted into the box below, be sent as an attachment or a link may be provided)*

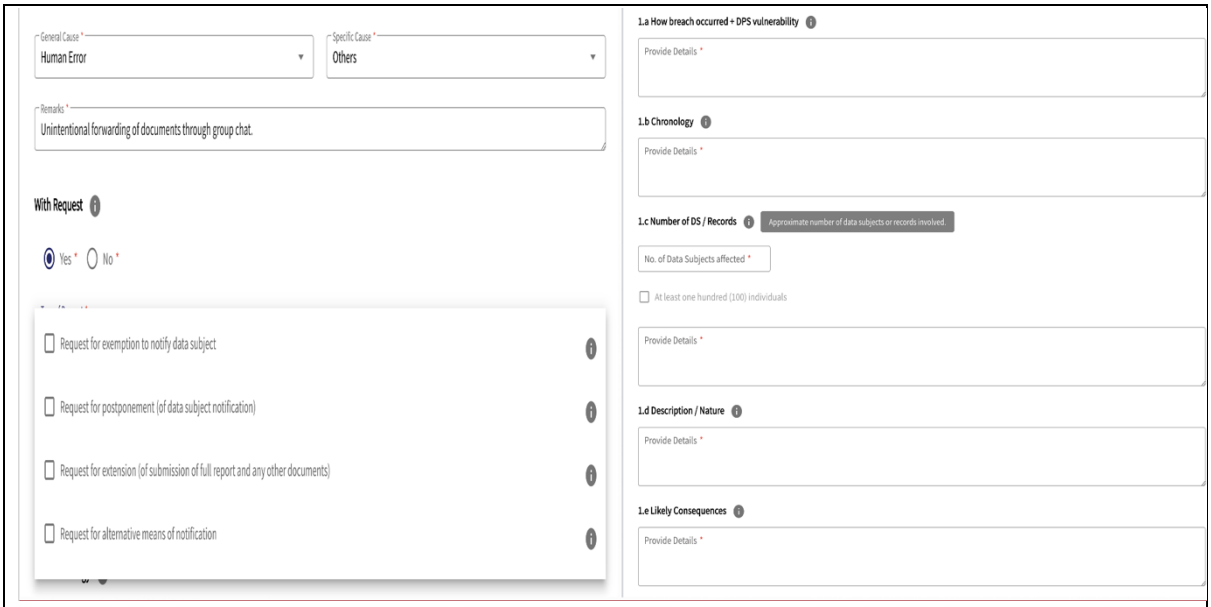
DBNMS link can be accessed here:
https://dbnms.privacy.gov.ph/login

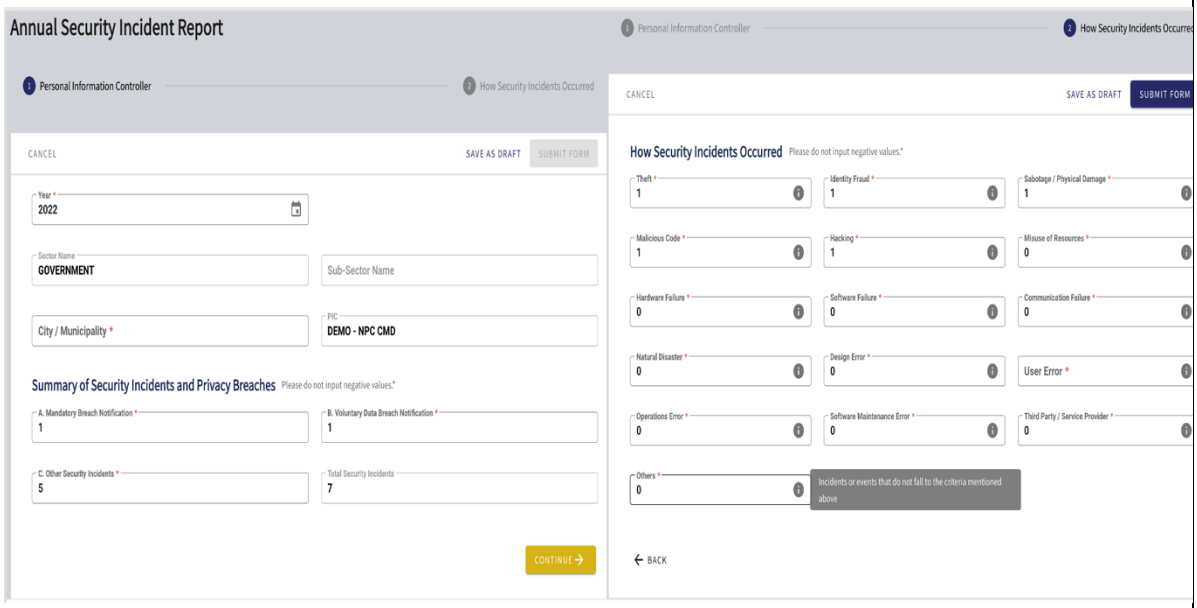


External Dashboard (PIC Facing)

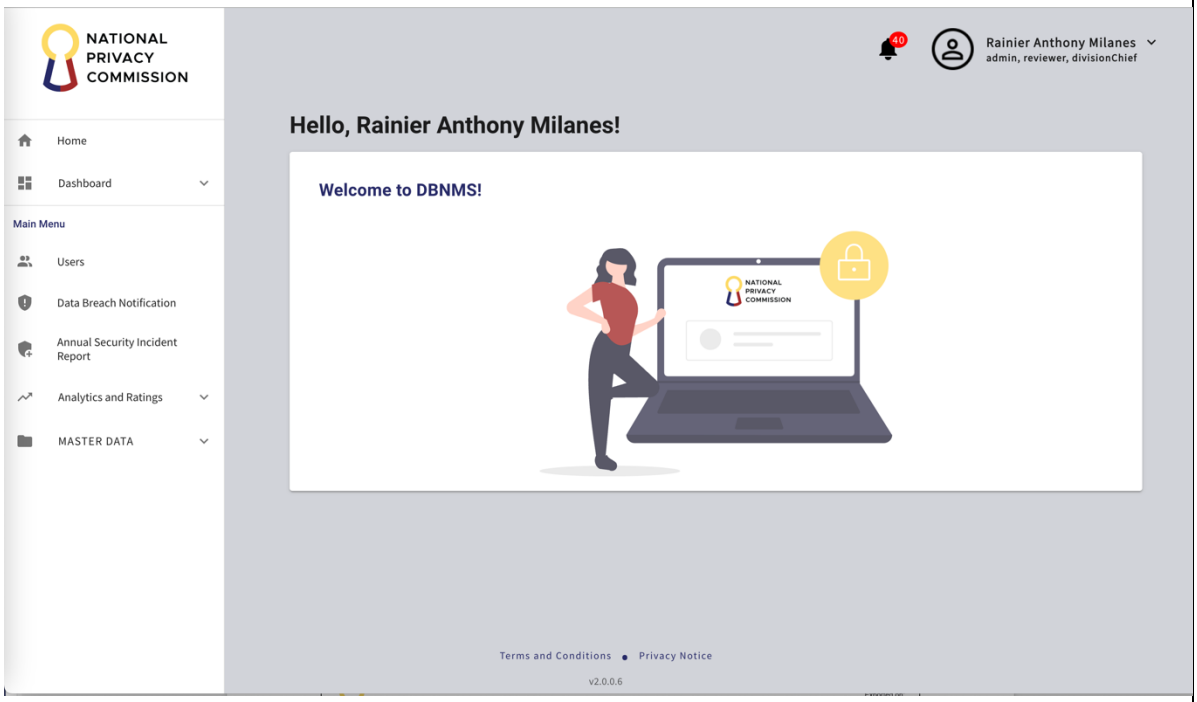


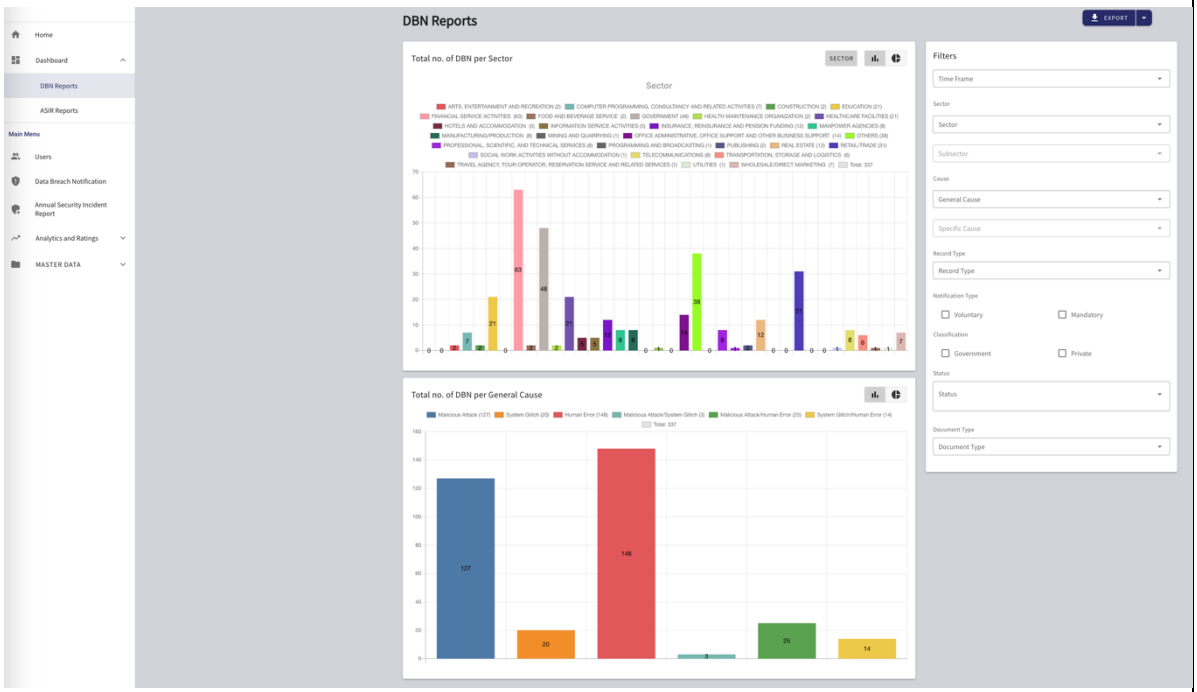



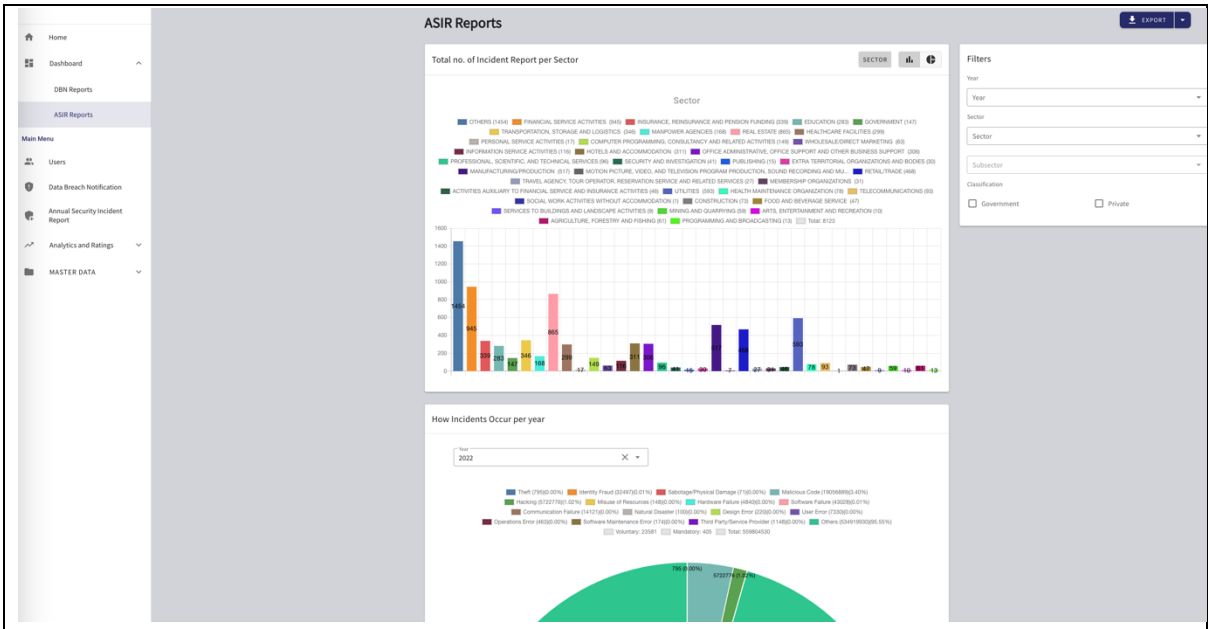

General Cause *
Human Error
Specific Cause *
Others
Remarks *
Unintentional forwarding of documents through group chat.
With Request
Yes *
No *
Request for exemption to notify data subject
Request for postponement (of data subject notification)
Request for extension (of submission of full report and any other documents)
Request for alternative means of notification
1.a How breach occurred + DPS vulnerability
Provide Details *
1.b Chronology
Provide Details *
1.c Number of DS / Records
Approximate number of data subjects or records involved.
No. of Data Subjects affected *
At least one hundred (100) individuals
Provide Details *
1.d Description / Nature
Provide Details *
1.e Likely Consequences
Provide Details *


Annual Security Incident Report
1 Personal Information Controller
2 How Security Incidents Occurred
CANCEL
SAVE AS DRAFT
SUBMIT FORM
Year *
2022
Sector Name
GOVERNMENT
Sub-Sector Name
City / Municipality *
PIC
DEMO - NPC CMD
Summary of Security Incidents and Privacy Breaches
Please do not input negative values.*
A. Mandatory Breach Notification *
1
B. Voluntary Data Breach Notification *
1
C. Other Security Incidents *
5
Total Security Incidents
7
CONTINUE
How Security Incidents Occurred
Please do not input negative values.*
Theft *
1
Identity Fraud *
1
Sabotage / Physical Damage *
1
Malicious Code *
1
Hacking *
1
Misuse of Resources *
0
Hardware Failure *
0
Software Failure *
0
Communication Failure *
0
Natural Disaster *
0
Design Error *
0
User Error *
Operations Error *
0
Software Maintenance Error *
0
Third Party / Service Provider *
0
Others *
0
Incidents or events that do not fall to the criteria mentioned above
BACK

Internal Dashboard (NPC Facing)






NATIONAL PRIVACY COMMISSION

**Annual Security Incident Report**

Exported on:
**6/8/2023**

## Total no. of Incident Report per Sector

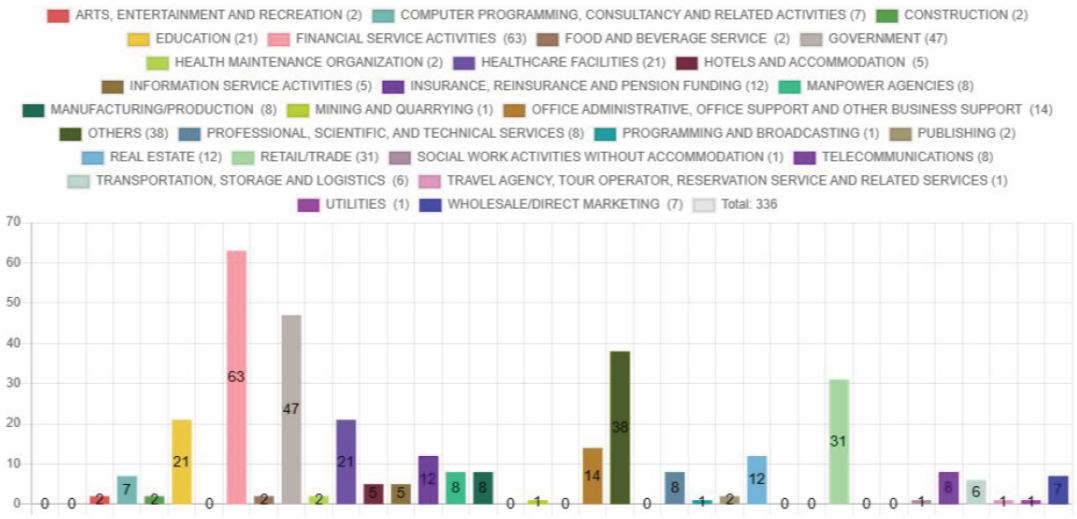
OTHERS (1454)(17.90%) FINANCIAL SERVICE ACTIVITIES (945)(11.63%) INSURANCE, REINSURANCE AND PENSION FUNDING (339)(4.17%)
EDUCATION (283)(3.48%) GOVERNMENT (147)(1.81%) TRANSPORTATION, STORAGE AND LOGISTICS (346)(4.26%)
MANPOWER AGENCIES (168)(2.07%) REAL ESTATE (865)(10.65%) HEALTHCARE FACILITIES (299)(3.68%)
PERSONAL SERVICE ACTIVITIES (17)(0.21%) COMPUTER PROGRAMMING, CONSULTANCY AND RELATED ACTIVITIES (149)(1.83%)
WHOLESALE/DIRECT MARKETING (63)(0.78%) INFORMATION SERVICE ACTIVITIES (116)(1.43%) HOTELS AND ACCOMMODATION (311)(3.83%)
OFFICE ADMINISTRATIVE, OFFICE SUPPORT AND OTHER BUSINESS SUPPORT (306)(3.77%)
PROFESSIONAL, SCIENTIFIC, AND TECHNICAL SERVICES (96)(1.18%) SECURITY AND INVESTIGATION (41)(0.50%) PUBLISHING (15)(0.18%)
EXTRA TERRITORIAL ORGANIZATIONS AND BODIES (30)(0.37%) MANUFACTURING/PRODUCTION (517)(6.36%)
MOTION PICTURE, VIDEO, AND TELEVISION PROGRAM PRODUCTION, SOUND RECORDING AND MUSIC PUBLISHING (7)(0.09%)
RETAIL/TRADE (468)(5.76%) TRAVEL AGENCY, TOUR OPERATOR, RESERVATION SERVICE AND RELATED SERVICES (27)(0.33%)
MEMBERSHIP ORGANIZATIONS (31)(0.38%) ACTIVITIES AUXILIARY TO FINANCIAL SERVICE AND INSURANCE ACTIVITIES (46)(0.57%)
UTILITIES (593)(7.30%) HEALTH MAINTENANCE ORGANIZATION (78)(0.96%) TELECOMMUNICATIONS (93)(1.14%)
SOCIAL WORK ACTIVITIES WITHOUT ACCOMMODATION (1)(0.01%) CONSTRUCTION (73)(0.90%) FOOD AND BEVERAGE SERVICE (47)(0.58%)
SERVICES TO BUILDINGS AND LANDSCAPE ACTIVITIES (9)(0.11%) MINING AND QUARRYING (59)(0.73%)
ARTS, ENTERTAINMENT AND RECREATION (10)(0.12%) AGRICULTURE, FORESTRY AND FISHING (61)(0.75%)
PROGRAMMING AND BROADCASTING (13)(0.16%) Total: 8123

NATIONAL PRIVACY COMMISSION

Data Breach Notification Report

Exported on: 6/8/2023

**Total no. of DBN per Sector**




**e. Please provide the most relevant link on the authority's website to the initiative, if applicable** *(The website content does not need to be in English)*

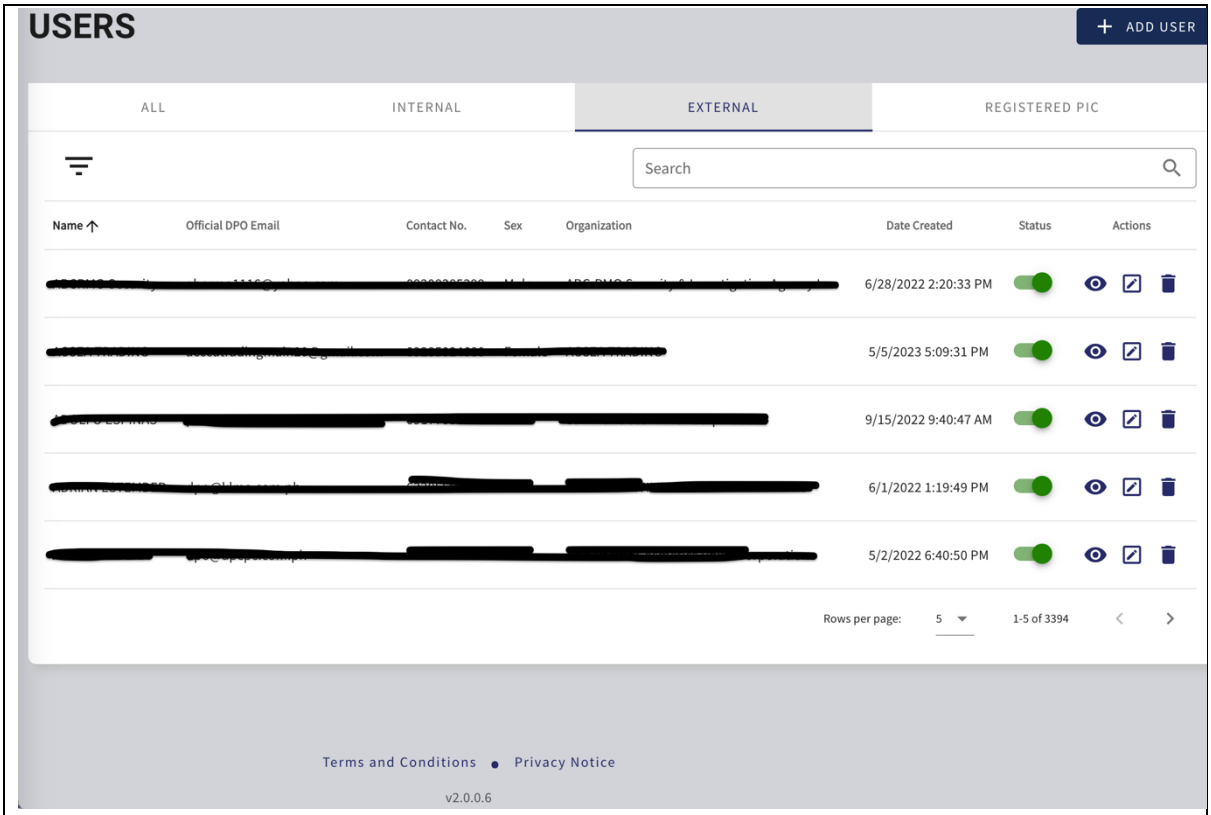
https://privacy.gov.ph/npc-launches-user-friendly-online-system-for-faster-and-easier-data-breach-notification-management-and-reporting/

https://privacy.gov.ph/pips-and-pics/breach-reporting/

**f. Please provide any other relevant links that help explain the initiative or its impact or success** *(e.g. links to news reports or articles):*

*https://www.bworldonline.com/economy/2022/04/24/444191/data-breach-reporting-system-up-and-running/*

https://syciplawresources.com/2023/05/12/npc-rolls-out-breach-notification-and-registration-platforms/?utm_source=mondaq&utm_medium=syndication&utm_term=Privacy&utm_content=articleoriginal&utm_campaign=article




*As of today there are 3394 external users of the DBNMS - PICs Reporting*