



ATENEIO DE MANILA UNIVERSITY

PRIVACY POLICY for Applicants, Students, and Alumni

Introduction

Welcome to the Ateneo de Manila University. This Privacy Policy (also known as a Privacy Notice) tells you about our policy regarding the data that we collect, use, or otherwise process your personal data. If you are the parent/legal guardian of an applicant or student (current or former) who is a minor (below 18 years old), understand that this Policy refers to the personal data of your child/ward.

We respect your right to privacy and aim to comply with the requirements of all relevant privacy and data protection laws, particularly the Data Privacy Act of 2012 (DPA). As in the case of the National Privacy Commission (NPC), we also seek to strike a balance between your personal privacy, and the free flow of information, especially when pursuing our legitimate interests and when necessary to carry out our responsibilities as an educational institution.

In this Policy, the terms, "data" and "information" are used interchangeably. When we speak of "personal data", the term includes the concepts of personal information, sensitive personal information, and privileged information. The first two are typically used to distinctively identify you. For their exact definitions, you may refer to the text of the DPA or you can visit the [website](#) of the University Data Protection Office. You should also note that while we give examples here to explain this Policy in simple and clear language, they do not make up an exhaustive list of all the data that we process.

Information We Collect, Acquire, or Generate

We collect, acquire, or generate your personal data in many forms. They may consist of written records, photographic and video images, digital material, and even biometric records. Examples include:

- a. *Information you provide us during your application for admission.* When you apply with us for admission, we collect, among others: (1) directory information, like your name, email address, telephone number, and other contact details; (2) data about your personal circumstances, such as your family background, history, and other relevant circumstances, previous schools attended, academic performance, disciplinary record, employment record, and medical records; and (3) any or all information obtained through interviews and/or during entrance tests or admission examinations.
- b. *Information we collect or generate after enrolment and during the course of your stay with us.* After you join the University, we may also collect additional information about you, including: (1) your academic or curricular undertakings, such as the classes you enroll in, scholastic performance, attendance record, etc.; (2) co-curricular matters you may engage in, such as service learning, outreach activities, internship or apprenticeship compliance; (3) your extra-curricular activities, such as membership in student organizations, leadership positions, and participation and attendance in seminars, competitions, programs, outreach activities, and study tours; and (4) any disciplinary incident that you may be involved in, including accompanying sanctions. There will also be times when we will acquire other forms of data like pictures or videos of activities you participate in, via official documentation of such

activities, or through recordings from closed-circuit security television cameras installed within school premises.

- c. *Unsolicited Information.* There may be instances when personal information is sent to or received by us even without our prior request. In such cases, we will determine if we can legitimately keep such information. If it is not related to any of our legitimate interests, we will immediately dispose of the information in a way that will safeguard your privacy. Otherwise, it will be treated in the same manner as information you provide us.

If you supply us with personal data of other individuals (e.g., person to contact in the event of an emergency), we will request you to certify that you have obtained the consent of such individuals before providing us with their personal data.

How We Use Your Information

To the extent permitted or required by law, we use your personal data to pursue our legitimate interests as an educational institution, including a variety of academic, administrative, research, historical, and statistical purposes. For example, we may use the information we collect for purposes such as:

1. evaluating applications for admission to the University;
2. processing confirmation of incoming, transfer, cross-registering, or non-degree students in preparation for enrollment;
3. recording, generating, and maintaining student records of academic, co-curricular, and extra-curricular progress;
4. recording, storing, and evaluating student work, such as homework, seatwork, quizzes, long tests, exams, term papers, theses, dissertations, culminating or integrating projects, research papers, reflection papers, essays and presentations;
5. recording, generating, and maintaining records, whether manually, electronically, or by other means, of grades, academic history, class schedules, class attendance and participation in curricular, co-curricular, and extra-curricular activities;
6. establishing and maintaining student information systems;
7. sharing of grades between and among faculty members, and others with legitimate official need, for academic deliberations and evaluation of student performance;
8. processing scholarship applications, grants, allowances, reports to benefactors, and other forms of financial assistance;
9. investigating incidents that relate to student behavior and implementing disciplinary measures;
10. maintaining directories and alumni records;
11. compiling and generating reports for statistical and research purposes;
12. providing services such as health, insurance, counseling, information technology, library, sports/recreation, transportation, parking, campus mobility, safety and security;
13. managing and controlling access to campus facilities and equipment;
14. communicating official school announcements;
15. sharing marketing and promotional materials regarding school-related functions, events, projects, and activities;
16. soliciting your participation in research and non-commercial surveys sanctioned by the University;
17. soliciting your support, financial or otherwise, for University programs, projects, and events;
18. sharing your information with persons or institutions as provided below.

We consider the processing of your personal data for these purposes to be necessary for the performance of our contractual obligations to you, for our compliance with a legal obligation, to protect your vitally important interests, including your life and health, for the performance of tasks we carry out in the public interest (e.g., public order, public safety, etc.), or for the pursuit of the legitimate interests of the University or a third party. We understand that the DPA imposes stricter

rules for the processing of sensitive personal information and privileged information, and we are fully committed to abiding by those rules.

If we require your consent for any specific use of your personal data, we will collect it at the appropriate time.

Please note further that we will not subject your personal data to any automated decision-making process without your prior consent.

How We Share, Disclose, or Transfer Your Information

To the extent permitted or required by law, we may also share, disclose, or transfer your personal data to other persons or organizations in order to uphold your interests and/or pursue our legitimate interests as an educational institution. For example, we may share, disclose, or transfer your personal data for purposes such as:

1. posting of acceptance to the University, awarding of financial aid and merit scholarship grants, class lists, class schedules, online, in school bulletin boards, or other places within the campus;
2. sharing of your personal data with your parents, guardians, or next of kin, as required by law, or on a need-to-know basis, as determined by the University, in order to promote your best interests, or to protect your health, safety, and security, or that of others;
3. sharing of some information to donors, funders, or benefactors for purposes of scholarship, grants, and other forms of assistance;
4. publication of scholars' graduation brochure for distribution to donors, funders, or benefactors;
5. distribution of the list of graduates and awardees in preparation for and during commencement exercises;
6. reporting and/or disclosure of information to the NPC and other government bodies or agencies (e.g., Commission on Higher Education, Department of Education, Bureau of Immigration, Department of Foreign Affairs, Civil Service Commission, Bureau of Internal Revenue, Professional Regulation Commission, Legal Education Board, Supreme Court, etc.), when required or allowed by law;
7. sharing of information with entities or organizations (e.g. Philippine Accrediting Association of Schools, Colleges and Universities, ASEAN University Network, and QS World University Rankings, Association of Philippine Medical Colleges, Education Commission for Foreign Medical Graduates) for accreditation and university ranking purposes;
8. sharing of information with entities or organizations (e.g., University Athletic Association of the Philippines and other sports bodies) for determining eligibility in sports or academic competitions, as well as other similar events.;
9. complying with court orders, subpoenas and/or other legal obligations;
10. conducting internal research or surveys for purposes of institutional development;
11. publishing academic, co-curricular, and extra-curricular achievements and success, including honors lists and names of awardees in school bulletin boards, website, social media sites, and publications;
12. sharing your academic accomplishments or honors and co-curricular or extra-curricular achievements with schools you graduated from or were previously enrolled in, upon their request;
13. use of photos, videos, and other information in order to promote the school, including its activities and events, through marketing or advertising materials, such as brochures, website posts, newspaper advertisements, physical and electronic bulletin boards, and other media;
14. live-streaming of University events;
15. publication of communications with journalistic content, such as news information in University publications, and social media sites;

16. providing information such as class lists and photos to partner hospitals, local health centers and other similar organizations, in the case of ASMPH students that rotate in these institutions as part of the medical curriculum.

How We Store and Retain Your Information

Your personal data is stored and transmitted securely in a variety of paper and electronic formats, including databases that are shared between the University's different units or offices. Access to your personal data is limited to University personnel who have a legitimate interest in them for the purpose of carrying out their contractual duties. Rest assured that our use of your personal data will not be excessive.

Unless otherwise provided by law or by appropriate University policies, we will retain your relevant personal data indefinitely for historical and statistical purposes. Where a retention period is provided by law and/or a University policy, all affected records will be securely disposed of after such period.

Your Rights with Respect to Your Personal Data

We recognize your rights with respect to your personal data, as provided by the DPA. If you wish to exercise any of your rights, or should you have any concern or question regarding them, this Notice, or any matter involving the University and data privacy, you may contact the University Data Protection Office (UDPO) at:

Questions: info.udpo@ateneo.edu

Complaints / Security Incidents: alert.udpo@ateneo.edu

Landline: +63 2 426-6001, loc. 4801

Website: ateneo.edu/udpo

Address: Rm 200, Manila Observatory, Ateneo de Manila University

Changing This Policy

We may, from time to time, make changes to this Policy. On such occasions, we will let you know through our website and, when permissible, other means of communication. Any modification is effective immediately upon posting on the website.

Other University Policies

Other policies of the University, which are not inconsistent with this one, will continue to apply. If any provision of this Policy is found to be unenforceable or invalid by any court having competent jurisdiction, the invalidity of such provision will not affect the validity of the other provisions, which shall remain in full force and effect.