



Miriam College

DATA PRIVACY GUIDELINES

IN USING ONLINE PLATFORMS IN
CLASSES AND/OR MEETINGS AND
CONDUCTING VIRTUAL
CEREMONIES OR ACTIVITIES
FOR EMPLOYEES



To ensure proper and adequate protection of the personal data of all MC community members, we request the parents and guardians of our students to instill in their children the exercise of due diligence in their online classes, activities, and dealings. We also encourage our whole community to foster an environment where data privacy and security are given importance.

In conducting any virtual/ online class or activity, always bear in mind the acronym **ALT-P** and if you are unsure, ask the right questions:

- ✓ **ACCOUNTABILITY** *(The School is accountable for all the personal data it collects and processes)*
 - *Can I protect what I collect?*
- ✓ **LEGITIMACY** *(Collect or feature only personal information according to your activity's authorized purpose)*
 - *Is my purpose valid and authorized?*
- ✓ **TRANSPARENCY** *(Declare the purpose of collecting and featuring personal data to your participants)*
 - *Is my purpose known to my data subjects?*
- ✓ **PROPORTIONALITY** *(Collect, feature, or process only necessary information from your participants)*
 - *Are the data I collect necessary and required?*

Provided below are some general information and guidelines for the School especially for the teachers and staff that are conducting online classes and activities. These guidelines are from the Department of Justice's Office of Cybercrime, National Privacy Commission's Data Privacy Council Education Sector and MC's Guidelines for the Use of Video Conferencing Tools/Services.

FOR EMPLOYEES PARTICIPATING AND USING ONLINE PLATFORMS

1. Create strong passwords when signing up on any e-learning tool/ platform. Passwords should be at least 12 characters containing upper- and lower-case letters, numbers, and, if possible, symbols.

NOTES:

1. **E-learning tools/platforms** are GSuite for Education, Genyo, Moodle LMS, EBSCO, MS Teams, and Zoom.
2. **Personal data** refers to any personal information whether recorded in a material form or not, from which the identity of an individual is apparent or can be reasonably and directly ascertained by the entity holding the information or when put together with other information would directly and certainly identify an individual.

2. Do not share your passwords and other personal data even with your supervisors, colleagues, or friends.
3. Check and customize the privacy settings of the e-learning tool/platform you are using.
4. Ensure that your consent is obtained for the recording of activities and meetings.
5. Stay alert during online sessions or meetings, especially when sharing videos, photos, and files. Similarly, do not spam the chatbox.
6. Use customized/virtual backgrounds to avoid accidental disclosure of personal data.
7. Install and regularly update an anti-virus program.
8. Mute the microphone and turn off the camera by default, especially when not speaking.
9. Turn off the microphone and camera when leaving one's station (e.g. *restroom break, etc.*).
10. As much as possible, do not connect phones, laptops, and other gadgets to free or public Wi-Fi networks. In unavoidable circumstances, ensure that the public network has a password and is not accessible to everyone.
11. Delete files or folders when the content no longer needs to be shared online.
12. Documentary requirements for transactions should be sent via the official MC email. Do not send files via social media.
13. Respect the privacy of your colleagues. Do not take screenshots of their video feeds and do not give out online links and their passwords to people who should not be in your activity or meeting.
14. Carefully review what personal information can be shared with the public even if you are using MC's social media platforms (e.g. *Facebook, YouTube, etc.*).
15. Take a moment to review the School's Data Privacy and Social Media Use policies.

NOTES:

1. **E-learning tools/platforms** are GSuite for Education, Genyo, Moodle LMS, EBSCO, MS Teams, and Zoom.

2. **Personal data** refers to any personal information whether recorded in a material form or not, from which the identity of an individual is apparent or can be reasonably and directly ascertained by the entity holding the information or when put together with other information would directly and certainly identify an individual.

FOR TEACHERS, TRAINERS, OR FACILITATORS USING ONLINE PLATFORMS IN CLASSES AND/OR MEETINGS

1. The official E-Learning Tools/Platforms should be covered by a Data Sharing Agreement or any equivalent document with standard data protection clauses in the contract between the educational institution and the vendors or service providers.

2. For teachers, trainers, or facilitators, always consider the privacy, equity, & peculiarity among students or employees when conducting online classes, learning sessions, or meetings:
 - Privacy - Participants might feel uncomfortable displaying their living space to their peers. Family members might not want their image or video to be captured because this is prone to cyberbullying and privacy issues.

 - Equity - Not all students or employees have reliable internet access. Some might have low bandwidth, cannot afford to stream videos, or have limited access to digital devices.

 - Peculiarity - Some participants might feel shy or anxious on camera, affecting their performance in class, session, or meeting.

3. Provide a privacy notice for recording and processing of personal data (e.g. *collecting the names for attendance checking, etc.*), if applicable. Among the legitimate uses of recorded classes or sessions could include:
 - Review of the presentations (e.g. slides) and ensuing class discussions at a later time.

 - Viewing by students (and/or their parents) or employees who are unable to attend, subject to appropriate school protocols.

 - Creating minutes of the meeting or for documentation

4. Where consent is necessary for the recording of these classes or sessions and the data subject is a minor, consent must be obtained from the parent, legal guardian, or any other person validly exercising parental authority over the child.

NOTES:

1. **E-learning tools/platforms** are GSuite for Education, Genyo, Moodle LMS, EBSCO, MS Teams, and Zoom.
2. **Personal data** refers to any personal information whether recorded in a material form or not, from which the identity of an individual is apparent or can be reasonably and directly ascertained by the entity holding the information or when put together with other information would directly and certainly identify an individual.

5. Recording may be shared to those who are absent from class, or webinar, as long as the student or employee is officially registered in class or in the webinar.
6. Provide the ID and Password only to the registered students and their parents or identified employees. Do not share them with the public.
7. You may secure your sessions by enabling the waiting-room option to filter who can join and by limiting participant action to limit who can share screen especially video/audio material, disabling renaming of names.
8. Provide a standard naming instruction for the participants, (e.g., *SURNAME, First Name, Middle Initial*) before they join the class or meeting.
9. Start classes or meetings with participant's video off and audio on mute. Whenever possible, the use of webcams in synchronous online classes or sessions should be optional. Participants (students and employees) should be permitted to use virtual backgrounds and fun filters and allowed to respond through audio or the videoconferencing app's chat and features, such as polls and nonverbal actions (e.g. *thumbs up*), instead of requiring them to turn on their cameras.
10. Make sure that a teacher or a school administrator is always present to supervise the activities in a virtual classroom.
11. An announcement or posting that involves personal data (e.g. *grades, results of assignments, etc.*) should be made in a manner that only makes it viewable by its intended recipient/s.
12. Downloading of personal data stored in the E-Learning Tools/ Platforms should be kept to a minimum and/or limited to that which is necessary for online learning or even for work purposes. Any downloaded data must be retained only until there is a legitimate need for such offline copy. Set retention periods.
13. Submission of class requirements via social media platforms is not allowed. There should be mechanisms in place so that submissions (e.g. *assignments, projects, etc.*) may be carried out safely and securely.

NOTES:

1. **E-learning tools/platforms** are GSuite for Education, Genyo, Moodle LMS, EBSCO, MS Teams, and Zoom.

2. **Personal data** refers to any personal information whether recorded in a material form or not, from which the identity of an individual is apparent or can be reasonably and directly ascertained by the entity holding the information or when put together with other information would directly and certainly identify an individual.

14. Disseminating, reposting, and resharing personal data (e.g. *grades and results of assignments or exams, etc.*) publicly using online platforms are strictly prohibited.
15. If there is an authorized purpose to post the recorded classes or sessions or making them available on public platforms (e.g. *social media, school website, etc.*), individuals who may be affected must have been informed beforehand of the school's intention to make the recording public. Getting the consent of said individuals may also be necessary.
16. Storing of personal data collected as part of the conduct of a class or due to work in a personal email account or device should be avoided or at least kept to a minimum to minimize the risk of unauthorized use or access. It is highly recommended that the School's official cloud storage be used.
17. Securely delete or dispose of personal data when you are no longer authorized to process or store them.
18. If online proctoring (*monitoring of students online during the test duration with the help of a webcam, mic, and access to the screen of the student*) will be done, explicit consent of the student (*or parent or legal guardian, in the case of minors*) should be obtained.
19. Regularly update the E-Learning Tools/Platforms you are using to their latest versions.
20. Limit the use of tools or technologies for online learning or working that have not been officially adopted by the School.
21. Exercise caution when integrating apps, supporting tools, and other services with E-Learning Tools/Platforms, as these other services may come with vulnerabilities.
22. An online platform under a personal account may be used by the Teacher, Trainer or Facilitator for synchronous classes. However, recording must be done by the students or participants so as to avoid storing recordings in the teacher or facilitator's personal cloud storage. Consent must still be acquired for recording purpose.

NOTES:

1. **E-learning tools/platforms** are GSuite for Education, Genyo, Moodle LMS, EBSCO, MS Teams, and Zoom.

2. **Personal data** refers to any personal information whether recorded in a material form or not, from which the identity of an individual is apparent or can be reasonably and directly ascertained by the entity holding the information or when put together with other information would directly and certainly identify an individual.

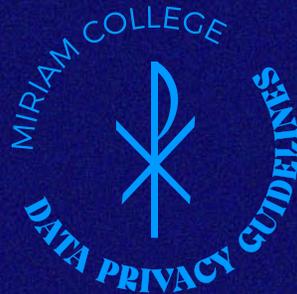
FOR ADMINISTRATORS AND STAFF CONDUCTING VIRTUAL CEREMONIES OR ACTIVITIES

Apart from the guidelines in using online platforms, the following must be considered:

1. Carefully review what personal information can be shared with the public even if you are using MC's social media platforms (e.g. *Facebook, YouTube, etc.*).
2. If your target audience involves internal participants particularly students and employees, do not make the link to the virtual event public. Distribute the link via email.
3. Provide privacy notice for recording during the event.
4. If the event is made public, immediately takedown public access when the ceremony is complete.
5. Event organizers, persons-in-charge, and administrators have a right to not accept a request to join the video conference room or remove a participant from the event if a person is unidentifiable, questionable, or displays poor or inappropriate decorum.

NOTES:

1. **E-learning tools/platforms** are GSuite for Education, Genyo, Moodle LMS, EBSCO, MS Teams, and Zoom.
2. **Personal data** refers to any personal information whether recorded in a material form or not, from which the identity of an individual is apparent or can be reasonably and directly ascertained by the entity holding the information or when put together with other information would directly and certainly identify an individual.



For inquiries, please contact:
MIRIAM COLLEGE DATA PRIVACY OFFICE
EMAIL: dpo@mc.edu.ph
www.mc.edu.ph