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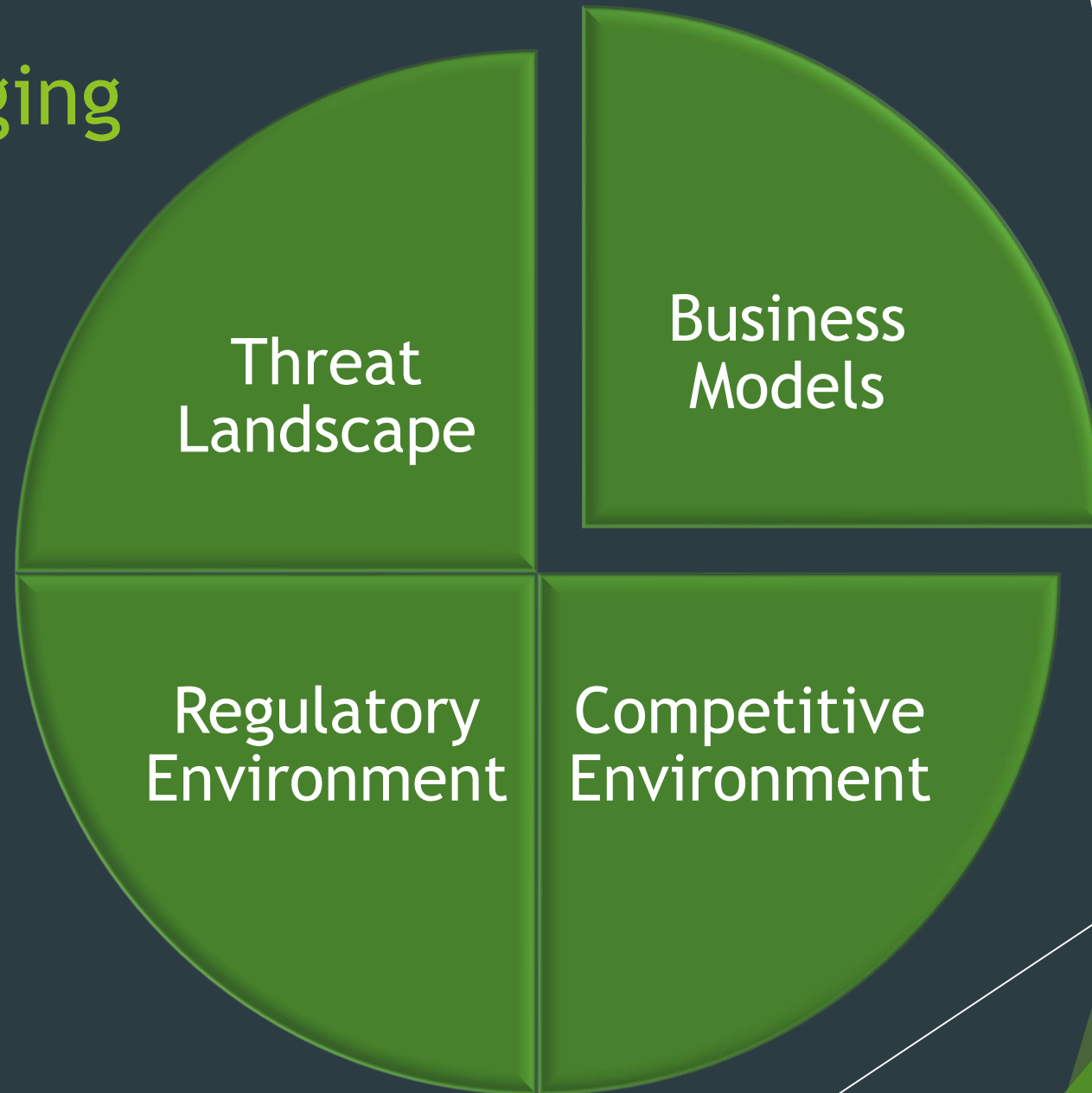


What APEC CBPR (and PRP) means for Philippine Businesses

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Data is changing
everything



In today's data-driven environment,
privacy has become the proxy for trust.

How do you know
who to trust?

How do you
demonstrate that
you can be
trusted?

CBPR: Cross Border Privacy Rules

PRP: Privacy Recognition for Processors



CBPR (50)

- ▶ Notice (4)
- ▶ Collection Limitation (3)
- ▶ Use of Personal Information (6)
- ▶ Choice (7)
- ▶ Integrity of Personal Information (5)
- ▶ Security Safeguards (10)
- ▶ Access and Correction (3)
- ▶ Accountability (12)

PRP (18)

- ▶ Security Safeguards (8)
- ▶ Accountability (10)



Changes in policies, procedures, forms

Changes in people's knowledge, attitudes, skills, and behavior

Changes in contracts with service providers and third parties

Lack of either may lead to violations!



Lack of collection policy	Overcollection of data	Unauthorized processing
Lack of information security policy	Data breach	Access due to negligence
Lack of disposal policy	Documents with SPI reused	Improper disposal
Lack of breach management policy	Breach not properly reported	Concealment of breach
Lack of data sharing agreements	Unauthorized use of SPI	Unauthorized purposes

Paper Compliance

Operational Compliance

Privacy Sweep Document Submission	<i>addresses</i>	On-Site Visit Customer Scrutiny Real-world Risk Factors
Regulatory Risk	<i>reduces</i>	Operational Risk
Fines, Penalties, Jail, Compliance Orders	<i>mitigates</i>	Real-world consequences such as Business Disruption, Remediation Costs, Lost Revenue/Reputation
Keeping documentation always up-to-date	<i>requires</i>	Building a culture of privacy through a variety of plans and programs

Compliance Management (PMP)



Accountability Agent

Accreditation requires unanimous endorsement from all 21 member economies

There are 15 criteria which must be met, such as:

- No conflict of interest
- Proven capability to check/audit against the intake questionnaire
- Maintain oversight and manage disputes

Each country/economy can have one or more accountability agents

Accountability agent:

- verifies paper/operational compliance
- certifies companies that pass
- submits annual report to APEC Joint Oversight Panel



Ongoing Monitoring and Continuous Compliance

Changes in processing must be reviewed by the AA

Disputes must be resolved by AA

Non-compliance (including findings of breaches) may result in certification being revoked



Re-certification

Re-certification audit should be scheduled
3 months prior to expiration of certification
Currently on an annual basis
Bi-annual is being considered

Global Expansion

Version 2.0

AA
Cooperative

The APEC Cross-Border Privacy Rules (CBPR) System, endorsed by APEC Leaders in 2011, is a voluntary, accountability-based system that facilitates privacy-respecting data flows among APEC economies.

Thank you for your time and
attention. Any questions?

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