



Republic of the Philippines  
 Department of Finance  
**INSURANCE COMMISSION**  
 1071 United Nations Avenue  
 Manila



Certificate Number: AJA18-0159

Insurance Commission Ruling (ICR) No.	2019-04
Date:	11 October 2019

**MGen ROBERT M. AREVALO AFP (Ret)**

*President and CEO*

Armed Forces and Police Mutual Benefit Association, Inc.  
 Col Bonny Serrano Road cor. EDSA  
 Camp Aguinaldo, Quezon City

**SUBJECT :** Inquiry on the Application of IC CL No. 2006-35 re:  
 Submission of Bio-data of Members of the Board  
 of Trustees and Corporate Officers

**Dear MGen Arevalo:**

This pertains to the your letter dated 28 August 2019 inquiring on the application of Circular Letter (CL) No. 2006-35 regarding the submission of biographical data (bio-data) of the members of the board of trustees and corporate officers.

Particularly, the company claimed in the said letter that:

- a. It has reservations whether the disclosure of personal information is aligned with Data Privacy Principles of Transparency, Legitimate Purpose and Proportionality considering that CL No. 2006-35 was issued long before the effectivity of the Data Privacy Act of 2012, the latest governing law in handling personal information, sensitive personal information and privilege information;
- b. Minutes of Meeting of the Annual General Membership (AGM) 2019 will only be approved by the members in the next AGM (2020), thus, it is not yet available at this time; and
- c. Since Trustees and Corporate Officers of the company are in the active uniformed service and as such, require a certain degree of confidentiality by virtue of national security, the company request for the exemption in the submission of personal information of its Trustees and Corporate Officers.

As regards the company's first claim, please be informed that the Data Privacy Act of 2012 does not apply to information that are required to be submitted to this Commission pursuant to CL No. 2006-35.

Although said CL was issued in 2006, which was way before the effectivity of the Data Privacy Act of 2012, the latter law recognizes the authority of regulatory agencies to require submission of information in order to carry out the statutorily mandated function and included the same among the exemptions from the