



Legal Watch

NPC ADVISORY NO. 2026-003



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SUMMARY

The National Privacy Commission (NPC) issued an advisory opinion addressing whether a municipal assessor or other government agency may disclose property identification maps, vicinity maps, or digital tax maps containing the names of the landowners for project due diligence and negotiation purposes. The NPC ruled that while landowner names appearing on these maps constitute personal information under the Data Privacy Act of 2012 (DPA), the DPA do not operate as a blanket prohibition against the disclosure of personal information held by government agencies.

The NPC clarified that such disclosure may be legally permissible under Section 12(c) of the DPA where the processing is necessary for compliance with a legal or regulatory obligation to which the Personal Information Controller is subject. This may include where the disclosure of landowner names is necessary to identify the affected proper parties for land access, easements, and stakeholder engagement required by energy or environmental regulations.

NPC further emphasized that government offices cannot categorically deny requests based solely on data privacy or generalized local resolutions, as local policies cannot override the lawful-basis framework of national law, unless the local government clearly restricts disclosure on privacy matter grounded in proper application of DPA. The request must be highly targeted, parcel-specific, and project-specific rather than broad or speculative. The disclosing agency, as the Personal Information Controller (PIC), must evaluate requests on a case-by-case basis to ensure adherence to the core data privacy principles of transparency, legitimate purpose, and proportionality.

* Agency Name

National Privacy Commission
(NPC)

* Issuance Title

Disclosure of Landowner
Names in Property
Identification Maps

* Issuance Date

12 May 2026

* Publish Date

09 June 2026

* Link

https://privacy.gov.ph/wp-content/uploads/2026/06/NPC_Advisory-Opinion-No.-2026_003_redacted.pdf





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ACTIONABLE ADVICE

Clients, particularly project and infrastructure developers, seeking property identification records from government agencies should ensure that their requests are narrowly tailored, parcel-specific, and tied to a clearly defined project area. In submitting such requests, it is recommended that individuals/companies should explicitly establish the applicable legal, regulatory, or project-related obligations supporting the disclosure, such as presenting relevant government service contracts or governmental mandates, and clearly document the specific purpose of the data, such as easement negotiations or social acceptability processes.

Conversely, clients operating as, or advising government repositories of property-related records, (such as assessor offices) should avoid issuing blanket denials on privacy grounds based solely on a local resolution or a broad interpretation of the DPA.

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