

BRAINS LEARNING MANAGEMENT SYSTEM (LMS)

PRIVACY POLICY

BRAINS Training and Review Corporation (“BRAINS”) respects and protects the personal data of students enrolled in its programs and using the BRAINS Learning Management System (LMS), in accordance with Republic Act No. 10173 (Data Privacy Act of 2012) and its implementing rules and regulations.

I. SCOPE

This Privacy Policy applies to all students and users who access or participate in LMS-based activities, including lecture viewing, assignments, assessments, examinations, and monitored sessions.

II. PERSONAL DATA COLLECTED

BRAINS may collect and process the following personal data:

1. Personal identification information (e.g., name, age)
2. Contact information provided upon enrollment (email address and mobile number)
3. Video recordings, audio recordings, photographs, and screen captures taken during LMS sessions
4. System-generated data related to LMS access and usage (e.g., login records, session duration)

III. PURPOSE AND LEGAL BASIS OF PROCESSING

Personal data is collected and processed for legitimate educational, administrative, and regulatory purposes, including:

1. Verification of student identity
2. Delivery and administration of review programs
3. Monitoring and enforcement of academic integrity
4. Investigation and resolution of violations or irregularities
5. Compliance with applicable laws, regulations, and lawful orders of courts or government agencies

Processing of personal data is based on the data subject's consent and on the legitimate interests of BRAINS in ensuring academic integrity, program credibility, and regulatory compliance.

Monitoring and recording are also used to deter, detect, and investigate unauthorized copying, recording, or distribution of LMS lectures, videos, and instructional materials, which are protected by copyright and other intellectual property laws.

IV. MONITORING AND RECORDING

During LMS sessions, BRAINS may implement:

- Webcam video recording
- Audio recording
- Screen capture or screen recording
- Random photo capture

These measures are strictly limited to purposes of identity verification, academic honesty, program integrity, and the deterrence, detection, and investigation of unauthorized copying, recording, or distribution of LMS lectures, videos, and instructional materials which are protected by copyright and other intellectual property laws.

V. STORAGE, ACCESS, AND DISCLOSURE

1. Personal data shall be stored securely using reasonable organizational, technical, and administrative safeguards.
2. Access to personal data is restricted to authorized BRAINS personnel only.
3. Personal data shall not be disclosed to third parties except:
 - When required by law;
 - Upon lawful order of a court or competent authority; or
 - When necessary for legal or administrative proceedings before government agencies, including but not limited to the Professional Regulation Commission (PRC).

VI. DATA RETENTION

Personal data shall be retained only for as long as necessary to fulfill the purposes stated in this Privacy Policy or as required by applicable laws and regulations. Thereafter, such data shall be securely disposed of or anonymized.

VII. DATA SUBJECT RIGHTS

In accordance with the Data Privacy Act, data subjects have the right to:

1. Be informed of the processing of their personal data
2. Access their personal data
3. Object to data processing, subject to legitimate grounds
4. Request correction of inaccurate or outdated data
5. Request data erasure or blocking, where applicable
6. Lodge a complaint with the National Privacy Commission (NPC)

The exercise of these rights is subject to applicable laws, institutional requirements, and verification procedures.

VIII. CONSENT

By enrolling in a BRAINS program and participating in LMS activities, the student (or parent/legal guardian, where applicable) acknowledges and consents to the collection, recording, processing, storage, and use of personal data as described in this Privacy Policy.

IX. POLICY UPDATES

BRAINS reserves the right to amend or update this Privacy Policy as necessary. Any changes shall take effect upon publication through the official BRAINS website or LMS.

X. DATA PRIVACY CONTACT

Data privacy concerns may be directed to BRAINS through its designated Data Protection Officer or authorized representative using the official contact details provided upon enrollment.