

GDPR (EU General Data Protection Regulation)-Based Privacy Policy of the National University Corporation University of Tsukuba

February 4, 2021
Determination of the President

This privacy policy has been established by the National University Corporation University of Tsukuba (referred to as “the Corporation” below, with the exception of Article 1 below) in response to the GDPR in order to set forth policies related to the processing of personal data and its transfer to the territory of third countries or organizations in third countries (referred to as “the extraterritorial transfer”) of data subjects who are located in countries to which the GDPR is applicable (regardless of nationality or residency.)

1 Definitions

The definitions of terms used in this Privacy Policy are provided in the table below.

Terms	Definitions
GDPR	General Data Protection Regulation: EU General Data Protection Regulation No. 2016/679.
Countries to which the GDPR is Applicable	This refers to the countries that make up the European Economic Area (the member countries of the EU, the Republic of Iceland, the Principality of Liechtenstein, and the Kingdom of Norway) and the United Kingdom of Great Britain and Northern Ireland. * The Information Commissioner’s Office (ICO), which is the personal data protection supervisory authority of the United Kingdom has stated that it complies with the GDPR.
Data Subject	This refers to an identified or identifiable natural person. “Identifiable natural person” refers to a person who can be identified directly or indirectly in particular by reference to an identifier such as a name, identification number, location data or an online identifier (such as an IP address, cookie, or MAC address) or by reference to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
Personal Data	Any information relating to an identified or identifiable natural person (‘data subject’).
Processing	Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
Restriction of	The marking of stored personal data with the aim of limiting their

Processing	processing in the future.
Profiling	Any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements.
Controller	The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
Processor	A natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.
Third Party	A natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data.
Consent of the Data Subject	Any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to them.
SCC	Standard Contractual Clauses * The agreement regarding extraterritorial transfers between enterprises within the EU and enterprises outside of the EU that was provided for by the Data Protection Directive (95/46/EC) that is applicable to the member countries of the EU.
SDPC	Standard Data Protection Clauses * This is a replacement for the SCC that is provided for by the GDPR
Adequacy Decision	A decision by the European Commission that a country or territory ensures an adequate level of protection. * When such a decision has been made, the extraterritorial transfer of personal data is possible without any special procedures. * Japan received an adequacy decision in January of 2019, but governmental institutions, incorporated administrative agencies and the like are not included in the framework of the adequacy decision.

2 Name and Address of the Controller

Name: National University Corporation University of Tsukuba

Address: 1-1-1 Tennodai, Tsukuba, Ibaraki

3 Use of Cookies

The main site of the Corporation and other websites of the Corporation (not including external websites linked to by said sites; referred to as “public websites” below) use cookies, a method of recording data for browsers that visit public websites. The use of cookies makes

it possible for information that is entered to be saved temporarily on the computer that is viewing the website, eliminating the task of reentering it the next time the website is accessed.

Additionally, if the data subject's browser has been set to permit the sending and receiving of cookies, the Corporation may acquire cookies that have been stored on the computer of the data subject and link the collected activity history with personal data.

4 Duties Subject to the Processing of Personal Data

For the types of personal data listed below, the Corporation may only carry out the processing of that personal data in order to carry out duties established for that particular personal data.

- (1) The personal data of persons applying (including persons whose admission has been approved; referred to as “applicants for admission” in the introductory clause of the following section) to the University of Tsukuba (including affiliated schools; the same is true for Items 13-F and 13-G below as well)
 - A The selection of admitted applicants
 - B The collection of and exemption from testing fees and admission fees
 - C Contact during emergencies, etc.
 - D Procedures, contact, etc. necessary for other duties
- (2) The personal data of the legal guardians and persons responsible for the educational expenses (this refers to the persons who have primary responsibility for educational expenses; the same is true in the introductory clause of Item 4 below as well) of applicants for admission
 - A The collection of and exemption from testing fees and admission fees
 - B Contact during emergencies, etc.
 - C Procedures, contact, etc. necessary for other duties
- (3) The personal data of students (including children and pupils of affiliated schools; the same is true below)
 - A Educational affairs
 - B Student support
 - C Career support
 - D International exchange
 - E Input into school internal systems and management
 - F Health management
 - G Payment of rewards, travel expenses, etc.
 - H The collection of and exemption from admission fees and tuition
 - I Payment procedures for scholarships, etc.
 - J Procedures related to taxes, etc.
 - K Contact during emergencies, etc.
 - L Surveys
 - M Procedures, contact, etc. necessary for other duties
- (4) The personal data of the legal guardians and guarantors of students and the persons responsible for their educational expenses
 - A The collection of and exemption from admission fees and tuition

- B Payment procedures for scholarships, etc.
 - C Contact during emergencies, etc.
 - D Procedures, contact, etc. necessary for other duties
- (5) The personal data of graduated and completed students (referred to as “graduates, etc.” in B below)
- A Certification of graduation or completion, performance, registration, etc.
 - B Contact with graduates, etc.
 - C Advertising
 - D Donations
 - E Surveys
 - F Procedures, contact, etc. necessary for other duties
- (6) The personal data of persons who wish to be employed by the Corporation (including persons who have been selected for employment; referred to as “persons who desire employment” in the introductory clause of the following Item)
- A Screening for employment
 - B Hiring procedures
 - C Contact during emergencies, etc.
 - D Procedures, contact, etc. necessary for other duties
- (7) The personal data of the families (including partners; the same is true below) of persons who desire employment
- A Contact during emergencies, etc.
 - B Procedures, contact, etc. necessary for other duties
- (8) Personal data of staff
- A Personnel affairs
 - B Payment of salary, bonuses, travel expenses, etc.
 - C Procedures for benefits
 - D Procedures for the Ministry of Education, Culture, Sports, Science and Technology Mutual Aid Association and the Japan Health Insurance Association
 - E Personnel management
 - F Health management
 - G Contact with temporary transfer destinations and origins
 - H Retirement procedures
 - I Procedures related to taxes, etc.
 - J Input into school internal systems and management
 - K Contact during emergencies, etc.
 - L Surveys
 - M Procedures, contact, etc. necessary for other duties
- (9) Personal data of the families of staff
- A Procedures for benefits
 - B Procedures for the Ministry of Education, Culture, Sports, Science and Technology Mutual Aid Association and the Japan Health Insurance Association
 - C Procedures related to taxes, etc.
 - D Contact during emergencies, etc.
 - E Procedures, contact, etc. necessary for other duties

- (10) Personal data of donors
 - A Issuance of certificates of donation receipt
 - B Sending of premiums for donations, etc.
 - C Input into school internal systems and management
 - D Procedures, contact, etc. necessary for other duties
- (11) Personal data of patients and their families
 - A Healthcare
 - B Input into hospital internal systems and management
 - C Procedures, contact, etc. necessary for other duties
- (12) Personal data of visitors to public websites
 - A Understanding of the use of public websites
 - B Improvement of public websites
 - C Providing services for public websites
 - E Contact, etc. necessary for other duties
- (13) Personal data of persons other than those provided for in the Items above
 - A Contract procedures and management for temporary personnel
 - B Procedures and management related to contracts and invitations related to joint research
 - C Scientific, historical, and statistical processing related to scholarly research
 - D Applications, procedures, etc. for various projects
 - E Procedures and management related to use of the library
 - F Procedures and management related to participation in and invitations to events, etc. held by the Corporation or the University of Tsukuba
 - G Provision of services and information related to events, etc. held by the Corporation or the University of Tsukuba
 - H Payment of rewards, travel expenses, etc. and collection of fees
 - I Procedures related to taxes, etc.
 - J Surveys
 - K Procedures, contact, etc. necessary for other duties

5 Sources of Acquired Personal Data

The Corporation shall obtain personal data from the following sources in order to carry out the duties in the Article above.

- (1) Documents (including electronic records) for which the direct acquisition of consent based on consent from the data subject (from the legal guardian if the data subject is under 16 years of age (or under the age provided for by local law in a country to which the GDPR is applicable and local law makes such a provision) can be proven
- (2) Online identifiers such as IP addresses and MAC addresses acquired by the Corporation when the data subject is using an information service of the Corporation or is connected to an information network of the Corporation
- (3) Information that is publicly available on the Internet
- (4) Information from social media
- (5) Signatories of the SCC or SDPC

6 Duration of Storage of Personal Data

Personal data shall be stored for a period provided for by the laws and regulations of Japan or the regulations, etc. of the Corporation.

7 Lawfulness of Processing of Personal Data

When it is possible for the Corporation to process personal data lawfully, it shall be done as described below.

- (1) The data subject has given consent to the processing of his or her personal data for one or more specific purposes
- (2) Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract
- (3) Processing is necessary for compliance with a legal obligation to which the controller is subject
- (4) Processing is necessary in order to protect the vital interests of the data subject or of another natural person
- (5) Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
- (6) Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data

8 Rights of the Data Subject

Data subjects have the rights listed below. However, expenses shall be requested of the data subject in the event of a request for disclosure as provided for in the Japanese Act on the Protection of Personal Information Held by Incorporated Administrative Agencies, etc. (Act No. 59 of 2003).

(1) Right of Access

Data subjects may request that the controller provide their own personal data or other information provided for by the GDPR.

(2) Right to Rectification

Data subjects may request that the controller rectify without delay their own personal data when those data are inaccurate.

(3) Right to Erasure (Right to be Forgotten)

Data subjects may request that the controller erase without delay their own personal data when those data are acknowledged to fall under any of the items given below.

- A The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed.
- B The data subject has withdrawn consent for processing and there is no other legal ground for the processing.
- C The data subject objects to the processing pursuant to Article 21, Paragraph 1 of the GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Paragraph 2 of that Article.

- D The personal data have been unlawfully processed.
- E The personal data have to be erased for compliance with a legal obligation in EU or Member State law to which the controller is subject.
- F The personal data have been collected in relation to the offer of information society services referred to in Article 8, Paragraph 1 of the GDPR.

(4) Right to Restriction of Processing

Data subjects may request that the controller restrict the processing of personal data when Article 18, Paragraph 1 of the GDPR is applicable.

(5) Right to Data Portability

The data subject shall have the right to receive the personal data they have provided to the controller in a structured, commonly used, and machine-readable format when Article 20, Paragraph 1 of the GDPR is applicable. In addition, data subjects have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided.

(6) Right to Object

The data subject shall have the right to object at any time, on grounds relating to their particular situations, to processing of personal data concerning them which is based on Item 5 or 6 of the previous Article, including profiling based on those provisions.

(7) Right not to be Subject to Decision-Making based on Automated Processing, including Profiling

The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or similarly significantly affects them.

9 Provision and Sharing of Personal Data

In order to carry out the duties in Article 4, the Corporation may share personal data internally, provide them to the third parties listed below, or share them with such third parties, in compliance with the Japanese Act on the Protection of Personal Information Held by Incorporated Administrative Agencies, etc. (Act No. 59 of 2003) and other related laws and regulations.

- (1) Public authorities
- (2) Financial institutions
- (3) Private scholarship foundations
- (4) Medical institutions
- (5) Contractors
- (6) Signatories of the SCC or SDPC
- (7) Other organizations related its duties

10 Transfer of Data

Personal data may be transferred from overseas offices in countries to which the GDPR is applicable (sites providing support for activities supporting international cooperation, etc. for the pursuit of the Corporation's educational and research activities and support for educational and research activities carried out in Japan by educational and research institutions or the like in that country in cooperation with the Corporation) to the

Corporation or other overseas offices (not including overseas offices in countries to which the GDPR is applicable) or to third countries other than countries to which the GDPR is applicable (not including countries or territories that have received an adequacy decision) only as provided for by the SCC or SDPC, for reasons provided for in Article 49, Paragraph 1 of the GDPR, or when lawfulness is otherwise guaranteed.

11 Security Measures

As controller, the Corporation shall establish sufficient technical and organizational security measures concerning the protection of personal data.

12 General Provisions

The Corporation may revise this privacy policy according to its guidelines, based on laws and regulations. However, the Corporation will not use personal data collected with the consent of data subjects for changed purposes without obtaining the consent of the data subject in question.

Note

This Determination shall be effective as of February 4, 2021.