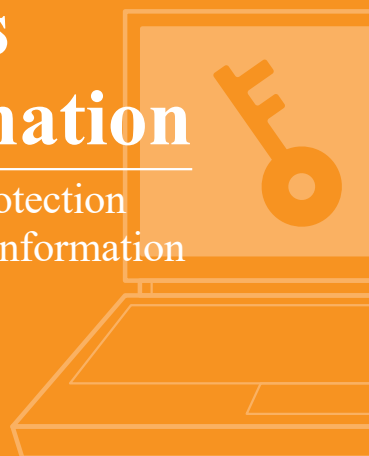


Nanzan University initiatives to protect personal information

Committee for the Protection
of Personal Information



The need to protect personal information

Many services make use of personal information these days. While they add an element of convenience to our lives, inappropriate handling of personal information can cause irreparable harm to the individual in question. Heightened concern about matters related to privacy led to the Act on the Protection of Personal Information being promulgated in May, 2003. In April 2005, a law was enacted in Japan concerning the protection of personal information. Since then, in May 2017, an amended law was enacted in order to cope with the rapid changes brought about by advances in information technology and the globalization of business activities. This law requires organizations to handle personal information in an appropriate manner so we can feel at ease when taking advantage of the benefits offered by an advanced information communications society.



What is “personal information”?

Information concerning living individuals, referring to entries such as date of birth etc., that would allow a specific person to be identified. Even if things such as student I.D. number, e-mail addresses, academic grades, physical attributes and status, that do not identify an individual when used alone, are also classified as personal information because when matched against a name etc, they make it possible to easily identify an individual.

Key points to the Act on the Protection of Personal Information

Point
1

Aims to protect the rights and benefits to the individual while taking into account the usability of personal information.

Point
2

This law establishes a set of shared minimum required rules for the handling of personal information by organizations, including universities.

Point
3

The law places emphasis on organizations, including universities, taking autonomous action in keeping with the circumstances of their particular operations.

Nanzan University initiatives to protect personal information

At Nanzan University, with our motto of *Hominis Dignitati* (for human dignity), from the viewpoint of the protection of privacy and basic human rights, we have established the Nanzan University “Guidelines for the Protection of Personal Information,” the “Committee for the Protection of Personal Information” and the “Committee for the Handling of Complaints regarding Personal Information” to ensure that the personal information that we acquire from students at the time they enter the University, and in a range of aspects of their student life, is handled appropriately and with the greatest consideration possible.

Rules regarding acquisition and use

- ◎ The objective of the use of the information shall be clearly specified.
- ◎ Information is acquired on the basis that it will be used to the minimum extent required in order to fulfil the specified purpose.
- ◎ In addition to personal information acquired from the individual, if it generates an evaluation or judgment of that person, the use of that personal information will also be limited to within the extent required.

Rules regarding appropriate management of personal information

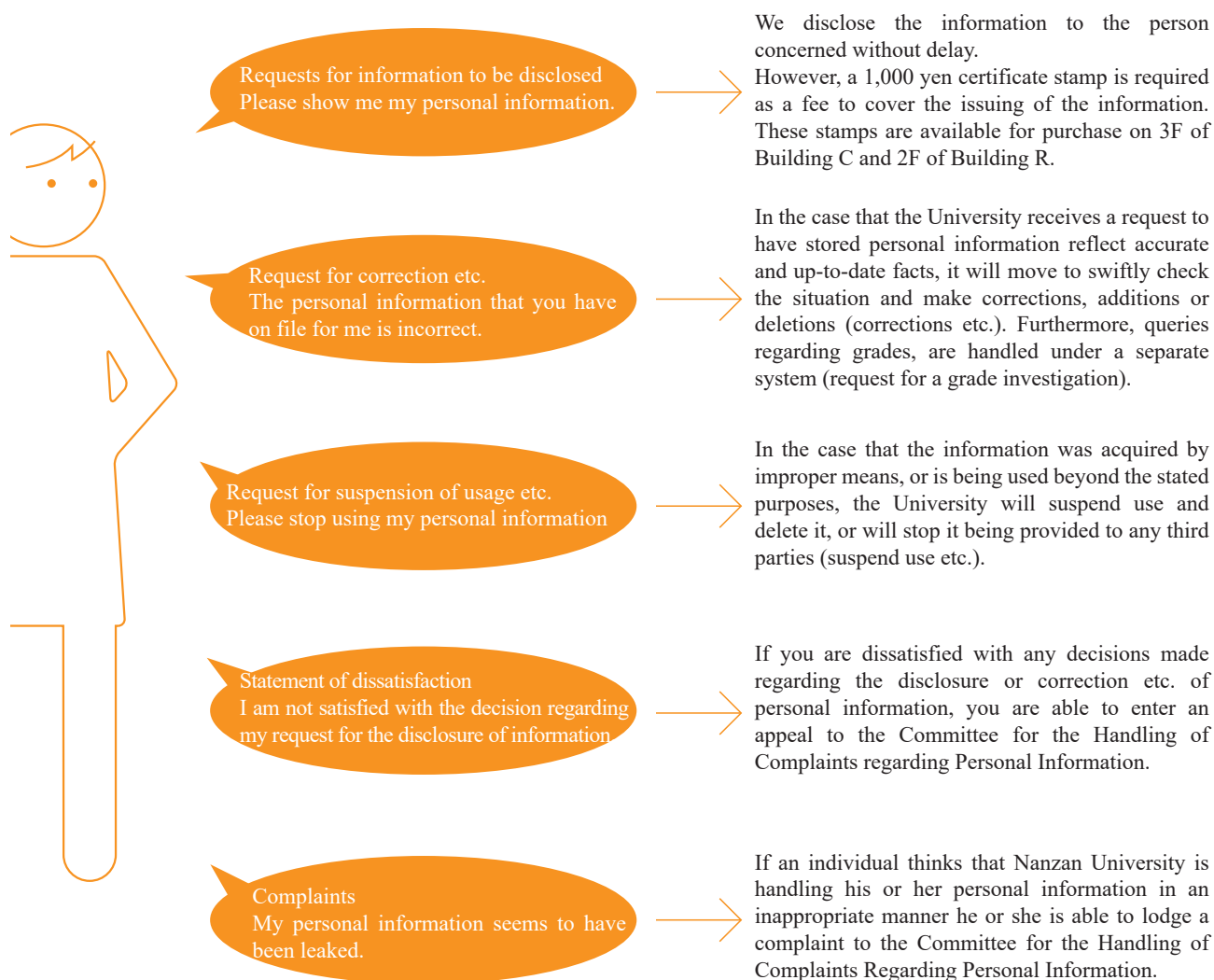
- ◎ All necessary measures will be taken to ensure that personal information is protected and that it remains accurate and up-to-date.
- ◎ A chief privacy officer, a corporate privacy professional and a corporate privacy associate shall be appointed. All will ensure that personal information is used, managed and disposed of appropriately.
- ◎ We accept the obligations regarding the appropriate handling of personal information, including those pertaining to confidentiality.
- ◎ In cases in which people outside the University are commissioned to do work involving the use of personal information, the University selects people committed to taking sufficient care in handling the information, and oversees the work done.

Rules regarding the provision of personal information to third parties

- ◎ As a general rule, personal information will not be provided to third parties without the permission of the person concerned.

System in which “people are directly involved”

At Nanzan University, we employ a system that involves the individual concerned in the management of their personal information. We react appropriately and swiftly to requests from individuals concerned.



Inquiries regarding the protection of personal information

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Nanzan University Guidelines for the Protection of Personal Information

1. Purpose

With the progress made in our advanced information communications society, the need is now greater than ever for us to pay close attention to the handling of personal information and to treat it appropriately. With respect to the protection of privacy and respect for basic human rights, in keeping with the spirit of our motto “For human dignity,” Nanzan University (hereafter: the University) has established the Guidelines contained herein in order to deal with all personal information that the University has obtained and maintains at its disposal in an appropriate manner and with the utmost consideration.

ii) Matters concerning specific personal information shall be determined according to the Nanzan School Corporation Guidelines Regarding the Handling of Specific Personal Information.

2. Basic Principles

The University is obliged to treat personal information with great care and propriety in accordance with the principles detailed below and within the framework of its motto “For human dignity.” Measures deemed necessary for their implementation shall be implemented at the earliest opportunity.

(1) Limits on the purpose of use

The purpose for the use of personal information must be clearly stated, and its treatment must be within the bounds deemed necessary for the accomplishment of the stated purpose of the use.

(2) Procedures for obtaining information

Personal information is to be obtained using proper and correct procedures and means and within the bounds of the limits placed on its use.

(3) Maintaining accuracy of personal information content

Personal information is to be maintained so that content is both accurate and up-to-date.

(4) Implementation of security protection measures

Personal information is to be subject to the implementation of appropriate security protection measures.

(5) Guarantee of individual participation

Individuals are to be given a guarantee of involvement in the process of the treatment of personal information and its content.

3. Definitions

(1) Individuals

In these Guidelines, “individuals” shall refer to all those who have at some time been associated with the University.

(2) Personal information

In these Guidelines, “personal information” shall refer to any information by which individuals can be identified, such as date of birth etc, obtained by the University in the pursuit of its duties. This includes information that can be easily matched with other information to identify a specific individual.

(3) Sensitive personal information

In these Guidelines, the term “sensitive personal information” means any information about the individual’s race, religious beliefs, social status, medical history, criminal history, facts related to their having been the victim of a crime, or any other details that require special care in order to avoid the individual becoming the object of unfair discrimination or bias.

(4) Anonymized personal information

In these Guidelines, the term “anonymized personal information” means information that has had parts deleted (including using methods that rule out the restitution of those deleted entries through regular patterns in the entries) to ensure that the individual cannot be identified.

(5) Retained personal data

In these Guidelines, the term “retained personal data” means personal information for which the University has the authority to disclose, correct, add to, delete, or cease provision to a third party, and excludes data which might harm public or other interests if its presence or absence becomes known.

4. Personal Information Management Duties

(1) Chief Privacy Officer, Corporate Privacy Professional and Corporate Privacy Associate

In order to ensure that personal information is obtained, used, managed, and disposed of in an appropriate manner at the University, the positions of Chief Privacy Officer (CPO), Corporate Privacy Professional (CPP) and Corporate Privacy Associate (CPA) are to be designated. The CPO shall have

overall authority and responsibility for the protection of personal information. The CPA shall be responsible for the creation of guidelines for the handling of personal information and ensuring their implementation in accordance with these guidelines. The CPP shall be responsible for overseeing the CPA.

(2) Duties concerning handling of information and

protection of secrecy

Employees of the University shall carry out their duties in a proper manner in respect of handling personal information and are duty-bound to protect the secrecy of personal information. This shall also apply even after the vacation of any post or position related to such duties.

(3) Commissioning of external bodies or agencies

In the event that external bodies or agencies are commissioned to carry out work involving personal information, such external bodies or agencies are to be chosen on the basis that they shall take adequate measures in terms of security management, and conditions governing the protection of personal information must be written into any contract without fail. Those carrying out commissioned duties are bound by the same obligations as employees of the University.

5. The Handling of Personal Information

(1) Limits and means for obtaining of information

In order to prevent any infringement of individuals’ rights and interests, the purpose of the use of personal information needs to be indicated clearly and precisely. Moreover, the personal information is to be maintained so that its content is within delineated boundaries specific to the purpose of its use. In addition to personal information obtained from an individual, if the University also generates personal information such as evaluations and assessments, it is obliged to also limit the scope of such information to that which is necessary. In principle, prior agreement from the individuals concerned should be acquired before the personal information is obtained.

(2) Notification procedures concerning information on record and access to such information

The type of personal information held by the University must be made clear both in order for the University to carry out its work efficiently and for individuals concerned to have involvement with the content thereof. The CPA is to provide notification of the following items to the University “Committee for the Protection of Personal Information,” and the University must give access to such information.

i) The administrative title under which the personal information is handled

ii) The purpose and outline of the administrative use

iii) The names of the administrative offices that handle personal information and the names of their CPP and CPA

iv) The range of people from whom personal information is obtained

v) A list of personal information items recorded

vi) The means employed to obtain personal information

vii) The form in which personal information is held

viii) Rules governing the removal of personal information

(3) Propriety of management

Personal information obtained by the University constitutes the fundamental data for the work carried out by the University. In the event that personal information is somehow leaked, lost, or changed, this will not only constitute an infringement of individuals’ rights and interests but will also interfere in the work of the University, leading to a loss of trust and, potentially, to the incurring of serious damage. CPP and CPA are bound by duty to take every precaution with regard to security protection measures where personal information is concerned.

(4) Methods of use

Except for in certain set circumstances, the personal information held by the University must be used within the bounds of the purpose stated when the information was obtained. Methods that may encourage or trigger illegal or unjust acts must not be used.

(5) Limits to the disclosure of personal information to third parties

In principle, personal information held by the University shall not be disclosed to any third party without the consent of the individual concerned.

When personal data is to be provided to a third party overseas, based on laws etc. and in accordance with laws and regulations governing the protection of the information for the third party in question, agreement must be gained from the individual when providing them with the information. Once the information has

been provided, ongoing measures must be taken to ensure that the personal information is protected and, if the individual so requests, information about the measures taken must be provided.

6. Public release, disclosure, corrections etc. and suspension of use of personal information held

(1) Public release etc.

The University must make the name of the administrative office managing the personal information, the title of the person in charge of managing the information and the purpose of its use readily available to the person whose information is being held. This includes providing replies without delay to any requests received from the individual concerned.

(2) Disclosure

In the case that an individual whose personal information is held requests that the University discloses that information to them, as a general rule, the University must disclose the information to that person without delay. With regard to the personal information in question, if the University decides not to disclose all or part of the information, or if the information does not exist, it must inform the person in question of that decision without delay.

(3) Corrections etc.

In the case that an individual whose personal information is held requests that the University corrects, makes additions to or deletes (hereafter referred to collectively as corrections etc.) information that allows identification of that person, but that individual claims is not factual, the University must investigate the situation without delay and, based on the result of such an investigation, take steps to carry out any corrections etc. With regard to the personal information in question, if the University decides to carry out corrections etc. to all or part of that information, or not to make any corrections etc. it must inform the person in question of that decision without delay. If corrections etc. are made, those details must also be conveyed to that person.

(4) Suspension of use etc.

In the case that an individual whose personal information is held requests that the University suspend use of, delete or suspend provision of that data to any third parties (hereafter referred to collectively as “suspension of use”) stating that that data was acquired or used in an improper manner, the University must suspend use without delay as soon as it finds that there are grounds for the request. When the University decides that it will or will not suspend use of all or part of that data, it must inform the individual concerned without delay.

(5) Lodging a complaint

An individual is able to lodge a complaint to the Committee for the Handling of Complaints Regarding Personal Information if he or she is unhappy with a decision made by Nanzan University regarding the disclosure, correction etc. or a request to suspend use of his or her personal information.

7. Complaints Procedures

If the individual in question considers that the University has handled his or her personal information in an improper manner, that individual is able to lodge a complaint to the Committee for the Handling of Complaints Regarding Personal Information.

8. Response when problems occur

If the CPO is concerned about the manner in which the personal information he or she is responsible for is being handled, or considers that it is not possible to deal with a matter within his or her own delegated authority, he or she must swiftly convey this in writing through their CPO to the University President and the Chair of the Committee for the Handling of Complaints Regarding Personal Information. Upon receipt of such a report, the chair must call a meeting of the Committee for the Handling of Complaints Regarding Personal Information and decide how to respond to the matter raised. If urgent action is required, precluding the holding of such a meeting, the chair shall take necessary measures and swiftly report the facts of the situation, the nature of the problem and how it will be handled to the chair of the Committee and the Committee for the Handling of Complaints Regarding Personal Information. In situations in which personal information held by the University is leaked, lost, damaged or otherwise affected in a significant manner that may negatively impact upon the individual's rights and interests, this shall be reported to the Personal Information Protection Committee and, as a general rule, notify the individual concerned.

9. Establishment of a Personal Information

Protection Committee

The University shall establish a Personal Information Protection Committee, whose duties shall be to:

- i) carry out any necessary action pertaining to the administration of the personal information protection system across the entire University campus;
- ii) carry out training and education activities so the proper handling of personal information can be put into practice;
- iii) bear responsibility for discussing matters received from personal information handling offices regarding the acquisition, use, provision, disclosure, correction etc. of personal information.
- iv) discuss any other matters deemed to be important for the protection of personal information.

10. Establishment of a Personal Information

Complaints Committee

The University shall establish a Personal Information Complaints Committee, whose duties shall be to

- i) discuss and settle any issues raised by individuals concerning how a personal information handling office has handled any request for access to, correction or removal of personal information;
- ii) deal with complaints concerning personal information;
- iii) decide on how to deal with any problems that may arise.

11. Anonymized information

(1) Creation of anonymized personal information

When creating anonymized personal information the information shall be processed in keeping with the requirements set out in the Nanzan University Guidelines for the Protection of Personal Information in a manner that ensures that a specific individual cannot be identified or restored to its original full form.

When creating the anonymized personal information, in addition to implementing safety measures to prevent the leaking of information, the categories of information that include that anonymized personal information must be made public.

(2) Provision to third parties

When anonymized personal information is to be provided to a third party, in addition to announcing the categories in which individual's information is included and the method of provision of the information, the third party must be informed that the information has been anonymized.

(3) Prohibition of acts that lead to identification of an individual

When handling anonymized information, it is prohibited to acquire personal information in the anonymizing process or match it against other information or in order to identify an individual.

(4) Measures etc. to ensure the safe management of information

With regard to the handling of anonymized personal information, the University must take appropriate steps required to ensure the safe management of such information and in addition to taking such steps, must make every effort to make the nature of those steps public.

12. Administrative work related to the protection of personal information

The administrative work related to the protection of personal information shall be carried out by the office handling the personal information in question. The coordination of the administrative work related to shall be carried out by the Office of the President.

13. Amendments to the Guidelines

Any amendments to these Guidelines shall be undertaken by the President of the University subject to prior deliberation by the Personal Information Protection Committee or the Personal Information Complaints Committee, and the University Senate.

Addendum

These Guidelines come into force from April 1, 2005.

Addendum

These Guidelines come into force from April 1, 2015.

Addendum

These Guidelines come into force from December 1, 2015.

Addendum

These Guidelines come into force from September 1, 2023.