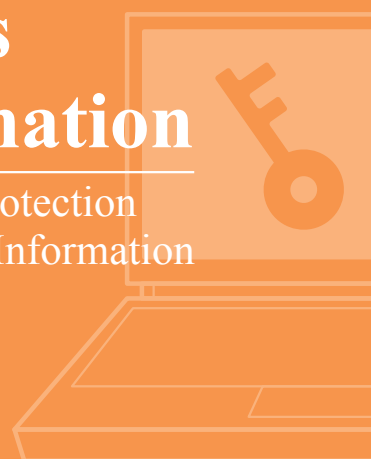


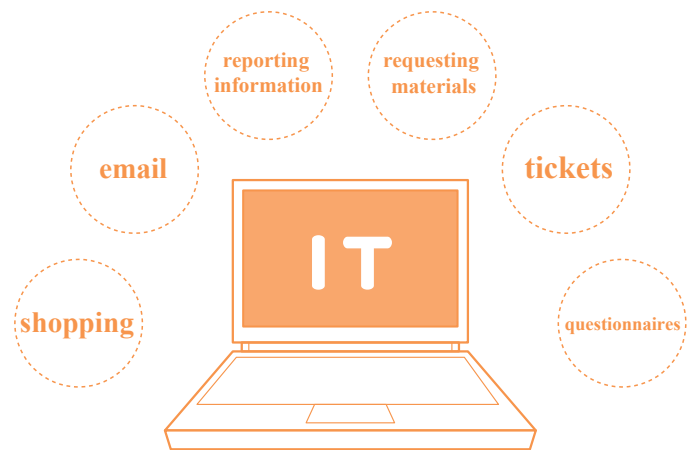
Nanzan University initiatives to protect personal information

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”?

It refers to information pertaining to the individual, including name, date of birth or other details that allow a specific individual 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. In addition, we insist that the following rules are adhered to so personal information can be used and managed appropriately.

Rules regarding the use and acquisition of personal information

- ◎ The information must be gained directly from the individual in question.
- ◎ The objective of the use of the information shall be clearly specified.
- ◎ Only the minimum amount of information required to achieve the stated objective shall be acquired.
- ◎ In addition to personal information acquired from the individual, in cases in which personal information is generated in the form of evaluations or judgments of that person, the information acquired shall be kept within required parameters.

Rules regarding appropriate management of personal information

- ◎ We will strive to keep accurate and up-to-date information.
- ◎ We will ensure that specific people are given the responsibility for managing the handling and storage of the personal information, and that the information is used, managed and disposed of in an appropriate manner.
- ◎ 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 on the Protection of Personal Information

1. Purpose

With the advances made in our advanced information communications society, the need is now greater than ever for us to pay greater attention to the handling of personal information and to treat it appropriately. In keeping with the spirit of our motto “For human dignity”, Nanzan University (hereafter: the University) has set forth 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, with respect to the protection of privacy and respect for basic human rights.

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”. Any measures deemed necessary for their implementation shall be dealt with 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 such bounds deemed necessary for the accomplishment of the stated purpose of use.

(2) Due procedures for obtaining information

Personal information is to be obtained by proper and correct procedures and means.

(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 afforded the 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 obtained by the University in the pursuit of its duties by which individuals can be identified. What form such information takes is irrelevant, be it in the form of a document, table, photograph, electronic data, or any other form.

4. Personal Information Management Duties

(1) Personal information management officers

and records officers

In order to ensure that personal information is obtained, used, managed, and disposed of in an appropriate manner at the University, a personal information management officer (hereafter: management officer) and a personal information records officer (hereafter: records officer) are to be designated for each administrative office involved in the handling of personal information. The records officer shall be responsible for the creation of a guide to the

handling of personal information, setting forth the treatment of personal information pertaining to those administrative duties where jurisdiction applies and ensuring their implementation in accordance with said guide. The management officer shall have the responsibility of overseeing the records officer.

(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 Treatment of Personal Information

(1) Limits and means for obtaining of information

In order to prevent any infringement of individuals’ rights and interests, the nature of the purpose for the use of personal information is to be indicated clearly and precisely at the time of obtaining such information. Moreover, the obtaining of personal information has to be carried out within delineated boundaries specific to the purpose of use. In addition to the personal information obtained directly from individuals, the University also generates personal information from other sources such as evaluations and assessments, in which case the University is obliged to also limit the scope of such information to that which is necessary. In principle, the University does not permit the obtaining of information that may involve the infringement of individuals’ human rights or that pertains to the personal freedom of individuals in respect of such areas as thought, beliefs, or religion. In principle, the obtaining of personal information shall be sought directly from individuals. This is in recognition of the need to ensure the appropriate involvement of individuals concerned in respect of the personal information, and also this serves to prevent any infringement of individuals’ rights and interests.

The University does not permit the use of obtained information for any purpose other than that stated. In order to use information beyond its stated purpose, the consent of the individuals concerned is required.

(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. Administrative offices that deal with personal information are to give notification of the following items, while the University is to guarantee access to such information.

- i) The administrative title of the personal information handled
- ii) The administrative purpose of the personal information handled and an outline thereof

- iii) The names of the administrative offices that handle personal information and the names of their management and records officers
- iv) The scope of the target audience that has access to the personal information
- v) A list of items on record in the personal information
- vi) The means employed in obtaining the 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. As such, the content of the personal information held must be accurate and up-to-date. This requires that every effort is made to try and keep the personal information held accurate and up-to-date at all times.

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. Management officers and records officers are bound by duty to take every precaution with regard to security protection measures where personal information is concerned.

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

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

6. Individual Requests for Access to, Amendment of, or Removal of Personal Information

(1) Access requests

When individuals request access to personal information on record pertaining to themselves, the University must grant such access in a timely manner. Even if an individual is legally a minor, the University shall, in principle, grant access to that individual. However, special circumstances may require that the individual be accompanied by a guarantor or legal guardian.

(2) Amendment requests

When individuals request amendments to the content of their personal information in order that it reflects accurate and up-to-date information, the University must look into the matter in a timely manner and carry out any appropriate amendments.

(3) Removal requests

When the personal information of an individual has been obtained in an improper manner or has been used for purposes beyond those stated, the University must, upon the request of the individual, cease use of such information or remove it.

7. Complaints Procedures

The University must make every effort to resolve any complaint or grievance relating to personal information in a proper and expeditious manner.

8. Problem Response Procedures

When a records officer within a given department that handles personal information has doubts regarding the treatment of

personal information or determines that he or she does not have the authority to deal with a given situation, the records officer must file a written report without delay to the University President and the Chair of the Personal Information Complaints Committee (hereafter: Chair of the Committee) by way of the management officer, stating the facts of the matter and the nature of the problem.

Upon receiving such a report, the Chair of the Committee must call a meeting of the Personal Information Complaints Committee, which shall make a decision concerning the resolution of the problem. Where an emergency situation arises that does not permit the Committee to hold a meeting, the course of action shall be determined by the Chair of the Committee, who must then report at the earliest opportunity to the Committee as well as to the Personal Information Protection Committee, stating the facts of the matter, the nature of the problem, and the countermeasures taken.

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 discussion pertaining to the administration of the personal information protection system;
- ii) carry out training and education activities so that the proper handling of personal information can be put into practice;
- iii) bear responsibility for monitoring notifications received from personal information handling offices;
- iv) secure the prior consent of individuals where personal information is to be used beyond stated limits or where it is to be provided to third parties;
- v) discuss any other matters deemed necessary 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, amendment to, or removal of personal information;
- ii) deal with any other complaints concerning personal information;
- iii) decide on how to deal with any problems that may arise.

11. Establishment of an Office Responsible for the Protection of Personal Information

All administrative work related to the protection of personal information shall be undertaken by the President's Office.

12. 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.