

Privacy Policy based on the EU General Data Protection Regulation (GDPR)  
(In regard to the processing of personal data of residents within the European  
Economic Area)

Doshisha University (hereafter referred to as “the University”) lays down this privacy policy (hereafter referred to as “this policy”) to indicate the University’s policy relating to the processing of personal data of natural persons identified or identifiable within the European Economic Area (EEA).

**1. Definition**

The definitions of terms in this policy are as follows:

Controller	Natural or legal person, government authority, agency or other person who, alone or jointly with others, determines the purposes and means of processing of personal data. In this policy, the “controller” means the University.
Data subject	The subject data means an identified or identifiable natural person in the European Economic Area (EEA). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, local data, an online identifier or to one or more factors specific to the physical, physiological genetic, mental, economic, cultural or social identity of that natural person.
Personal data	The Personal data means information relating to the data subject with which a specific individual can be identified.
Processor	A natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.
Recipient	Recipient means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients. The processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.
Third party	A natural or legal person, public authority, agency or body other

	than the subject data, controller, processor and persons whom under the direct authority of the controller or processor, are authorized to process personal data.
Restriction of Processing	The marking of stored personal data with the aim of limiting their processing in the future.
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
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 related to him or her.

## 2. The name and the address of the controller

Name : The Doshisha Doshisha University (“Doshisha University” referred here only means Doshisha University, Doshisha University graduate schools as well as Doshisha University professional graduate schools and does not include the other schools in the corporation.)

Address : 601, Genbucho, Karasuma-higashi-iru, Imadegawa-dori, Kamigyo-ku, Kyoto-shi 602-8580

## 3. Cookies

In various services provided through the utilization of web technology such as the University website (hereafter referred to as “web technology utilizing services”), the technology referred to as Cookies may be used to improve its accessibility. The usage of Cookies allows the inputted information to temporarily be stored in the computer used to view a website, with which a person can save time for having to input the information in another webpage or upon accessing the same website again. Additionally, Cookies are used to collect data relating to the use situation of the University’s web technology utilizing services (access number, browsing pages, browsing time, etc.). When Cookies are used, its usage is indicated on the corresponding webpage, and the collected data will be used for the improvement of the applicable services.

#### **4. Google Analytics**

In the University's web technology utilizing services, Google Analytics may be used for the purpose of data analysis in order to grasp the usage situation and to improve the applicable service. When Google Analytics is used, its usage is indicated on the corresponding webpage, and the collected data will be used for the improvement of the applicable services.

The data collected by Google Analytics through the University's web technology utilizing services are managed based on the privacy policy of Google LLC; Doshisha university will not be held responsible for any damage that may occur through the use of Google Analytics.

For Google Analytics terms of service, please refer to the following:

[Google Analytics Terms of Service](#)

#### **5. Access logs**

In the University's web technology utilizing service, an access log is recorded in order to manage the corresponding services as well as for analysis of the usage situations. The access log includes browsers' domain names, IP addresses, accesses dates and times, types of browsers used, etc.

#### **6. Purposes, etc. of the processing of personal data**

##### **(1) Categories of personal data collected**

- ① Information relating to a person (name, sex, date of birth, nationality, occupation, residence status information, family information, parents or guardian information, transfer information)
- ② Contact information (email address, phone number, FAX number, mail-sending address)
- ③ Enrollment status (information, etc. relating to study plan and academic achievement assessment)
- ④ Financial condition (information, etc. relating to university fee payment status and scholarship)
- ⑤ Educational and career background
- ⑥ Cookies, IP address

##### **(2) Sources from which the personal data is collected**

For the purpose of processing of (3) mentioned below, the University collects personal

data from the following sources.

- ① Collected directly from the data subject (E.g.: Personal data written on an application, etc.)
- ② Collected indirectly from the data subject (E.g.: IP address collected upon browsing the University's website, etc.)
- ③ Public information (information on the Internet)
- ④ Social media (E.g. Twitter、Facebook、Weibo)
- ⑤ Investigation report provided from a third party

### **(3) Purposes of the processing**

The university processes personal data solely for the following purposes:

#### **A Personal data of a student**

- ① Academic affairs
- ② International exchange
- ③ Student support service
- ④ Career support service
- ⑤ Information environment use support service
- ⑥ Health service

#### **B Personal data of a parent/ guardian**

- ① Notice for tuition payment, etc.
- ② Notice for and relating to parents association operation
- ③ Donation

#### **C Personal data of alumna**

- ① Services related to the proof of graduation, academic achievement, enrollment, etc.
- ② Public relations
- ③ Donations
- ④ Services related to the cooperation with alumna

#### **D Personal data of faculty member**

- ① Personnel information
- ② Payment of fee, wage, bonus, etc.
- ③ Procedures for welfare
- ④ Procedures for social insurance, tax matters, etc.
- ⑤ Correspondence/Provision to labor union, health insurance society, affiliated company, assignment company, etc.
- ⑥ Procedure upon retiring
- ⑦ Correspondence in case of emergency, etc.
- ⑧ Notice/Report to government office

- ⑨ For other purposes such as procedures and correspondence required on business

#### **E Personal data of the University website browser**

- ① Grasp of the University website use condition
- ② Improvement of the University website

#### **(4) Personal data provision/ sharing**

The university may share personal data with the following third parties for the purpose of processing of above-mentioned (3).

- ① The university's institutes, parents association, alumni association, mutual aid association as well as teachers and staff union
- ② Professional experts such as lawyers, tax accountants, certified public accountants, etc.
- ③ Financial institutions
- ④ Present, past, and prospective faculty members
- ⑤ Government, municipality, regulatory body, courts, etc.
- ⑥ Outsourcing contractors

In addition to the above-mentioned, the University may provide personal data to the police and judicature in the event of the court order, etc. in accordance with Japanese domestic law.

### **7. The legal basis for the processing of personal data**

The legal basis for the processing of personal data are as follows:

- ① the data subject has given consent to the processing of his or her personal data for one or more specific purposes.
- ※when the processing is based on the consent of the data subject in the above-mentioned
- ①, the data subject shall have the right to withdraw consent.
  - 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 University is subject.
  - ④ processing is necessary in order to protect the important 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 University.公
  - ⑥ processing is necessary for the purpose of the legitimate interests pursued by the

University or by a third party, except where such interests are overridden by the fundamental rights and freedoms of the data subject which require protection of personal data.

## **8. Rights of the data subject**

The data subject shall have the following rights. There is no fee to performing these rights. However, when the request from the data subject is manifestly unfounded, repetitive, or excessive, the University may request the data subject to bear the reasonable expense or refuse to handle the request.

### **(1) Right to the information**

When collecting personal data from the subject data, the University must, at the time when personal data are obtained, provide the data subject with certain information.

### **(2) Right of access**

When the data subject requests access to personal data in processing, the University must provide the copy of the personal data.

### **(3) Right to rectification**

The data subject may request to the University the rectification of inaccurate personal data.

### **(4) Right to erasure (right to be forgotten)**

The data subject may request the University the erasure of personal data concerning him or her without delay in certain cases.

### **(5) Right to restriction of processing**

The data subject shall have the right to obtain from the University restriction of processing in certain cases.

### **(6) Right to notification regarding rectification or erasure of personal data or restriction of processing**

In the case of (3), (4), or (5), the University shall communicate any rectification or erasure of personal data or restriction of processing to recipients and inform the data subject about those recipients in the data subject requests it.

### **(7) Right to data portability**

The data subject shall have the right to receive the personal data concerning him or her in a structured, commonly used and machine-readable format. The data subject shall also have the right to transmit those data to another controller without hindrance from the University.

### **(8) Right to object**

The data subject shall have the right to object the processing of personal data which

is based on the necessity of processing for the purposes of the legitimate interests pursued by the University or a third party.

**(9) Lodgment of a complaint to supervisory authority**

The data subject shall have the right to lodge a complaint to a supervisory authority when the data subject is dissatisfied with the University's handling of the personal data processing or the performance of the above-mentioned rights.

**9. Security measures**

As a controller, the University takes sufficient technical and organizational security measures in relating to the protection of personal data. When the subject data has concerns about specific transfer mechanisms of personal data, etc., the University takes sufficient alternative measures.

**10. Border transgressional data transfer**

The University may transfer the personal data of the data subject to Japan on the basis of an adequacy decision regarding border transgressional data transfer collected by Japan.

**11. Storage period of personal data**

The University shall store personal data only for the period necessary to achieve the purpose of collecting personal data.

**12. Essential information**

The data subject shall always have the right to choose whether or not to provide personal data to the University. However, when the data subject does not provide information that is essential for the University to provide services, the University may not be able to provide all or a part of the services.

**13. General provision**

The University may alter this policy in accordance with statute or due to the University policies. However, the University shall not use personal data with new means without the consent of the data subject.

Contact Information

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