

**KEIO UNIVERSITY PRIVACY POLICY
FOR APPLICANTS AND STUDENTS
FROM STUDENT EXCHANGE PARTNER UNIVERSITIES
IN THE EUROPEAN ECONOMIC AREA**

First published: January 26, 2021

Keio University is committed to protecting your privacy and informing you of your rights in relation to your personal data.

As we receive and process your application and provide our services, we collect, use, and generate personal data about you. When we process your personal data, we endeavor to comply with all applicable data protection laws, including the General Data Protection Regulation of the European Union (GDPR). Below is our policy on how we process and protect your personal data. You can view the latest version of this policy at the following link:

[URL] https://www.ic.keio.ac.jp/en/study/exchange/apply/application_documents.html

■ ENTITY IN CHARGE (controller)

This privacy policy is issued by us, KEIO UNIVERSITY. When we process your personal data, we are the data controller as defined by the GDPR and are responsible for protecting your personal data rights.

■ PURPOSES AND LAWFUL BASIS (why and on what legal grounds we use your personal data)

We collect, use, and generate the following categories of personal data:

- Basic personal information to identify and contact you, including your name, telephone number, gender, e-mail address, residential address, date of birth, and citizenship; and
- Information necessary for processing your application for our student exchange program and for providing our services, including support for living in Japan (e.g., application for a Certificate of Eligibility for Residence, resident registration, enrolling in public health insurance, helping you find accommodation, and providing counseling). This information includes, but not limited to, your residential status in Japan, name, residential address and telephone number of your guarantor, learning experience and competency in the Japanese language, scholarship details (sponsor, amount, duration, application for JASSO scholarship, etc.), native language, job history, home university/institution/college,

educational and academic record, certificates of Japanese language competency, reference letters, passport photo for ID card, passport information, information detailing your economic circumstances (e.g., bank account balance of your sponsor or certificate of scholarship), information about your health and/or disability (if applicable), and your academic record while studying at Keio.

We collect, use, and generate personal data on the following lawful bases:

- 1) Processing your application, providing you with our services, and providing support for life in Japan, as this information is necessary to fulfil our obligations under the agreement with your home institution;
- 2) Performing our statutory obligations as an educational institute e.g., managing records of administrative, educational, and academic operations, and reporting to competent authorities, etc., in accordance with the Private School Act and other applicable laws and regulations of Japan when necessary for the purposes of our legitimate interests, such as complying with our statutory obligations; and
- 3) Facilitating our daily operations as a university when necessary for the purposes of our legitimate interests i.e., performing our daily operations appropriately and maintaining high educational and academic standard as university, including:
 - monitoring and improving our educational and academic standards
 - managing security related to our physical facilities and computer/network resources
 - managing any disciplinary actions
 - establishing, exercising, and defending our legal claims.

■ SENSITIVE PERSONAL DATA

We collect and/or use sensitive categories of personal data as defined in Articles 9 or 10 of the GDPR only when such collection and/or use is authorized by the said article(s). For example, we may ask you for information about your medical history and disability (if applicable). Your voluntary disclosure of such information will be deemed as explicit consent to our using such information for providing you with any assistance or counseling you may seek from us. We may also use such information in order to protect your vital interests, e.g., for emergency rescue.

■ RETENTION (how long we retain your personal data)

We will retain personal data about your application for our student exchange program for 5 years. For those who are admitted to our student exchange program, we will retain the personal data we collect and generate during your studentship with us for an indefinite period of time as an academic record.

■ **DISCLOSURE** (whom we share your personal data with)

As shown in the table below, we shall disclose certain categories of personal data when necessary for the purposes described above to the respective recipients.

Categories of personal data to be disclosed	Recipients
Personal data necessary for acquiring certificate of eligibility for residence on your behalf	Tokyo Regional Immigration Bureau
Personal data necessary for arranging accommodation	Operator of accommodation and/or intermediary agency
Personal data necessary for processing your inquiries, receiving your application, processing your admission, reporting and communicating with your home university, providing support for administrative procedures (e.g., scholarships, immigration, residence, and public health insurance), and providing other support for daily life	Asahi Net Inc. and Livresque Co., Ltd., our contracted service providers which help us perform various administrative and operational tasks
As relevant	Our contracted service providers for cloud computing, electronic mail and other network applications or IT resources, courier services, receptionist services, conference/event arrangements, etc.

Where such service providers are “data processors” as defined by the GDPR, we make sure that such data processors have in place appropriate data protection measures by virtue of data processing contracts between such processors and us in compliance with Article 28 of the GDPR.

■ **TRANSFER TO NON-EU COUNTRIES**

In principle, we do not transfer your personal data to any entities located in any other countries outside of the European Economic Area when data protection laws with a level of privacy and data protection equivalent to that of GDPR are not in force. In cases when such data transfers occur, we will either ask for your prior consent thereto or protect your personal data rights by virtue of data transfer agreements with relevant data recipients pursuant to Article 46 of the GDPR, which impose such recipients’ contractual obligations to ensure an adequate level of data protection equivalent to those laid down by the GDPR.

■ **YOUR LEGAL RIGHTS**

Provided that certain conditions are met, you have legal rights to request the following:

- Access to your personal data and to certain supplementary information covered by this notice;
- Correction of your personal data if inaccurate or incomplete;

- Erasure of your personal data in certain circumstances;
- Suspension of using your personal data in certain circumstances;
- Stop the processing of your personal data in certain circumstances; and
- Obtaining your personal data in a structured, commonly used, and computer-readable format.

If you wish to exercise these rights, please contact us.

■ COMPLAINTS

You can lodge complaints about how we process your personal data with data protection supervisory authorities.

■ INQUIRIES

For further information and inquiries, contact:

International Exchange Services Group

Office of Student Services

Keio University

ic-student@adst.keio.ac.jp