

**KEIO UNIVERSITY PRIVACY POLICY
FOR APPLICANTS AND STUDENTS
FROM THE EUROPEAN ECONOMIC AREA**

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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] http://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 applications for our programs and for providing our services, including support for your visa applications. 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, 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 financial circumstances (e.g., your bank account balance and/or your sponsor's, 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 your stay in Japan, as this information is necessary for us to fulfil our obligations as a receiving university;
- 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 standards, 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 included in your applications for our programs for 5 years. For those who are admitted to our credit-bearing programs, we will retain the personal data we collect and generate during your studentship with us for an indefinite period of time as academic records.

■ 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
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Personal data necessary for acquiring a certificate of eligibility for residence on your behalf	Tokyo Regional Immigration Bureau
Personal data necessary for preparing documents for your application for a short-term stay visa	JTB Corp.
Personal data necessary for arranging accommodation	Hotels, JTB Corp. or other agencies
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, credit card payments, 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-short-program@adst.keio.ac.jp