

OUR PRIVACY POLICY
FOR APPLICANTS, STUDENTS, AND ALUMNI
FROM OUR PARTNER UNIVERSITIES
IN THE EUROPEAN ECONOMIC AREA AND THE UNITED KINGDOM
WITH STUDENT EXCHANGE AGREEMENTS

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We, WASEDA UNIVERSITY, take your privacy seriously. As we receive and process your application and provide you with class-related, academic, and other student and alumni services, we collect, use and generate personal data about you. When we process your personal data, we undertake to comply with all the protections afforded to you by the applicable data protection laws including the EU General Data Protection Regulation¹ and the UK General Data Protection Regulation² (collectively the “GDPR”). Please find our policy on how we process and protect your personal data below. You can obtain the latest version of this policy at the following link:

<https://www.waseda.jp/foiaw/icl/en/partner/>

■ **RESPONSIBLE PARTY (controller)**

This privacy policy is issued by us, WASEDA UNIVERSITY. When we process your personal data, we are the data controller in the meaning of the GDPR and are responsible for protecting your rights regarding personal data.

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

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

- Basic personal information to identify you and contact you such as the following:
 - Passport information (e.g. name, residential address, citizenship, place of birth,

¹ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)

² Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (United Kingdom General Data Protection Regulation)

gender)

- Contact information (e.g. telephone number, email address)
- Information necessary for proceeding with your application for one of our student exchange programs, providing you with class-related, academic, and alumni services, and providing support for your life in Japan (e.g. registering as a resident, enrolling in national health insurance, finding accommodation) such as the following:
 - Face photo for ID card and for Certificate of Eligibility application
 - Information about marital status, accompanying person (if any)
 - Family in Japan (if any) (e.g. relationship, name, date of birth, nationality/region, intent to reside with applicant or not, place of employment/school)
 - Guarantor information (e.g. name, address, telephone number, telephone number at work, annual income, relationship with applicant)
 - Information showing your economic circumstances (e.g. bank account balance of your guarantor or certificate of scholarship)
 - Information about your health and/or disability (if any)
 - Past entry into/departure from Japan, past history of applying for a COE, history of departure by deportation/departure order
 - Residence card number/ special permanent resident certificate number
- Information about your academic background and language skills such as the following:
 - Experience with the Japanese language
 - Certificates of Japanese language competency
 - Scholarship details (sponsor, amount, duration, whether you applied for the JASSO scholarship, etc.)
 - Native language
 - Certificates of English language competency
 - Certificate of enrollment
 - Job history
 - University/institution/college attended
 - Academic records
 - Reference letters

We collect, use, and generate the personal data described above for the following purposes on the respective lawful basis:

- 1) Proceeding with your application, providing you with our services and providing support for your life, on the lawful basis that it is necessary for the performance of our contract with you or in order to take steps at your request prior to entering into such contract;
- 2) Performing our statutory obligations as an educational institution, e.g. managing records of administrative, educational, and academic operations, reporting to competent authorities, etc. in accordance with the Private School Act and other applicable laws and regulations in Japan, on the lawful basis that it is necessary for the purpose of our legitimate interest, i.e. complying with our statutory obligations; and
- 3) Facilitating our daily operations as a 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, and
 - establishing, exercising and defending our legal claims,on the lawful basis that it is necessary for the purposes of our legitimate interests, i.e. performing our daily operations appropriately and maintaining high educational and academic standards as a university.

■ SENSITIVE PERSONAL DATA

We collect and/or use sensitive categories of your personal data as defined in Articles 9 and 10 of the GDPR only when such collection and/or use is authorized by said article(s). For example, we may ask you for information about your medical history and disability (if any). Your voluntary disclosure of such information will be deemed to be your explicit consent to our using such information in order to provide 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 related to your application for our student exchange program for 5 years. If you 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 for our records.

■ DISCLOSURE (who we share your personal data with)

As shown in the table below, we may disclose certain categories of personal data in so far as may be necessary for the purposes described above to the respective recipients.

Categories of personal data to be disclosed	Recipients
Personal data necessary for acquiring a Certificate of Eligibility for residence on your behalf	Immigration Bureau
Personal data necessary for resident registration and/or enrollment in national health insurance	Local government office in the area of your residence
Personal data necessary for arranging accommodation	Operator of accommodation and/or intermediary agency
Personal data necessary for processing inquiries from you, receiving your application, proceeding with admission, reporting and communicating with your home university, providing support for administrative procedures (e.g. scholarship, immigration, residence, national health insurance, etc.), and providing other living and housing support	Waseda University Academic Solutions Corporation, our contracted service provider, which helps us perform various administrative and operational tasks
As relevant	Our contracted service providers that provide cloud computing, electronic mail and other network applications or IT resources, courier service, receptionist service, conference/event arrangement, etc. For example, we outsource certain IT services to BOX, Microsoft, Google and AZIA Co., Ltd.

*In addition, your personal data may be disclosed in compliance with the laws of Japan, namely to fulfill requirements of laws and regulations, following court orders, or in response to requests by government or law enforcement agencies (including as required under national security or law enforcement measures) .

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

■ TRANSFER TO NON-EU COUNTRIES

Usually we will not transfer your personal data to any entities located in any other countries outside of the European Economic Area and the United Kingdom, where data protection laws with a level of privacy and data protection equivalent to that of the GDPR are not in force. In the case that such data transfer happens, we either ask for your prior consent thereto or we protect your rights regarding personal data by virtue of data transfer agreements with relevant data recipients pursuant to Article 46 of the GDPR, which imposes on such recipients contractual obligations to ensure an adequate level of

data protection that is equivalent to that stipulated 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
- Stopping the processing of your personal data in certain circumstances
- Obtaining your personal data in a structured, commonly used, and computer-readable format

If you wish to exercise your right, please contact us.

■ COMPLAINTS

You can lodge complaints about our way of processing your personal data with data protection supervisory authorities.

■ INQUIRIES

For further information and inquiries, contact:

Privacy Manager

Institute of Comparative Law

Waseda University

hiken@list.waseda.jp