

Privacy policy based on the EU General Data Protection Regulation (GDPR)
at National University Corporation Tohoku University

November 29, 2023

Approved by the President

1. Purpose

The purpose of this Privacy Policy is to set out the University's policy on the handling and transfer of personal data of data subjects – regardless of nationality and place of residence – located within the European Economic Area (EEA) and the UK at National University Corporation Tohoku University (hereinafter referred to as “the University”).

2. Definition

The definitions of terms used in this Privacy Policy are listed in the table below.

Term	Definition
GDPR	General Data Protection Regulation: EU General Data Protection Regulation No. 2016/679 and UK GDPR No. 679 and UK GDPR
Within the EEA	Refers to the member countries of the European Economic Area (EU member states, Iceland, Principality of Liechtenstein, and Kingdom of Norway).
Data subject	An identified or identifiable natural person. An identifiable natural person in this context is an identifiable natural person by reference, in particular, to an identifier such as a name, an identification number, location data, an online identifier (IP address, cookie, MAC address, etc.), or a person who can be identified, directly or indirectly, by reference to one or more factors that indicate genetic, mental, economic, cultural, or social identity.
Personal data	Information about the data subject.
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, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, or erasure or destruction. Refers to the performance of a task or the performance of a group of tasks.
Restriction of processing	Marking of stored personal data with the aim of limiting their processing in the future.
Profiling	Any form of automated processing of personal data comprising the use of personal data to evaluate certain personal aspects relating to a natural person, and, in particular, to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location, or movements.
Controller	The natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

Processor	A natural or legal person, public authority, agency, or other body which processes personal data on behalf of the controller.
Third party	A natural or legal person, public authority, agency, or body other than the data subject, controller, processor, and persons who, under the direct authority of the controller or processor, are authorised to process personal data.
Consent of the data subject	The data subject is given the freedom to choose whether or not to consent, the handling of personal data obtained through consent is clearly specified, and the data subject clearly expresses his or her will after receiving these explanations in advance. That is, a data subject, by statement or clear affirmative action, expresses consent to the processing of personal data relating to him or her.
SCC	Standard Contractual Clauses *This is a template agreement established by the European Commission or the UK government based on the GDPR that applies to the transfer of personal data outside the EU or the UK.
Adequacy decision	A country or region determined by the European Commission to have an adequate level of data protection. *If the decision is made, personal data will be able to be transferred outside the region without any specific authorisation.

3. Name and address of controller

Name: National University Corporation Tohoku University

Address: 2-1-1 Katahira, Aoba-ku, Sendai, Miyagi

General Affairs and Planning Department Legal Affairs and Compliance Division

[+81-22-217-6066]

4. Cookie

The University's web pages use cookies. Cookies are text files that are stored on your computer system via your Internet browser. Many Internet sites and servers use cookies. A cookie consists of a character string through which web pages and servers can be assigned to the specific Internet browser in which it was stored. This allows visited Internet sites and servers to identify the individual browser of the data subject from other Internet browsers that contain other cookies. A specific Internet browser can be recognised and identified using a unique cookie ID. Cookies allow the University to provide users of this website with more user-friendly services that would not be possible without the cookie setting.

By using cookies, the information on the University's website can be optimised with the user in mind in order to make it easier for users to use the University's website.

The data subject may, at any time, prevent access to cookies on the website of the University by selecting the corresponding settings on his or her Internet browser, and may thus permanently deny cookies. Already set cookies may be deleted at any time via the Internet browser or other software programs. This is possible with all common Internet browsers. If the data subject deactivates the setting of cookies on the Internet browser, not all functions of the University's website may be entirely usable.

*Types of cookies

(1) Classification by duration

1) Session cookies: Cookies that are deleted when the user closes the browser

2) Persistent cookies: Cookies that remain on the user's computer/device for a predefined period

(2) Classification by attribution

1) First type cookies: Cookies set by the web server and sharing the same domain

2) Third-party cookies: Cookies stored by a domain different from the domain of the visited page. This cookie occurs when a web page references files such as JavaScript that are located outside its domain.

5. Lawfulness of processing of personal data

The University handles personal data in the following cases.

(1) The data subject has given consent to the processing of his or her personal data for one or more specific purposes (GDPR Article 6, Paragraph 1 (a) consent; hereinafter referred to as "(a) consent").

(2) Processing is necessary for the performance of a contract to which the data subject is a party, or in order to take steps at the request of the data subject prior to entering into a contract (GDPR Article 6, Paragraph 1 (b) Performance of the contract; hereinafter referred to as "(b) Performance of the contract").

(3) Processing is necessary for compliance with a legal obligation to which the University is subject (GDPR Article 6, Paragraph 1 (c) Compliance with a legal obligation; hereinafter referred to as "(c) Compliance with a legal obligation").

(4) Processing is necessary in order to protect the vital interests of the data subject or of another natural person (GDPR Article 6, Paragraph 1 (d) Protect to vital interests; hereinafter referred to as "(d) Protect to vital interests").

(5) When the processing is necessary for the performance of operations carried out in the public interest or in order to exercise official authority granted to the University (GDPR Article 6, Paragraph 1 (e) Exercise of official authority; hereinafter referred to as "(e) Exercise of public authority")

(6) Processing is necessary for the purposes of legitimate interests pursued by the University or by a third party (GDPR Article 6, Paragraph 1 (f) Legitimate interests; hereinafter referred to as "(f) Legitimate interests").

6. Purpose of processing personal data and types of personal data processed:

The University processes personal data, including the personal data listed below, from data subjects within the EEA and the UK for the purposes set out below. In this case, we will also indicate on which legal basis the personal data will be processed, as shown in each section of Article 5. If the legal basis is (a) consent, the data subject may withdraw that consent at any time. We will also indicate if there is a third party to whom the information will be provided.

Data subject	Purpose of processing	Types of personal data obtained	Reasons for legalisation and destination if provided to a third party
Applicants for admission	Selection of new entrants, admission procedures, pre-admission education, follow-up surveys, etc., student dormitory move-in procedures, post-admission student support (scholarships, tuition fee exemptions, health management, etc.), educational purposes such as academic guidance, and tuition fee collection; relationships, surveys and research (improvement of	Applicant faculty/department or graduate school/major, name, date of birth, gender, nationality (region), current address and contact information, address and contact information in Japan (in the case of an agent, the person's name and relationship with the	(b) Performance of the contract; (f) Legitimate interests; improving entrance exams and the university's education through research and analysis of entrance exams and applicant behaviour, etc.

	entrance exams, trace surveys, etc., procedures for moving into student dormitories, student support after enrolment (scholarships, tuition fee exemptions, health management, etc.), educational purposes such as academic guidance, tuition fees; relationships with tax collection, etc., as well as surveys and research (improvement of entrance exams, investigation and analysis of applicant trends, etc.)	applicant), school education history, score and examination number of Examination for Japanese University Admission for International Students (EJU) ; score and examination date of TOEFL, TOEIC, etc.; study history after graduating from high school, Japanese language learning history, hobbies/ personality, etc.; purpose of study abroad, photographic portrait, high school or university graduation prospect certificate or graduation certificate items to be stated, items to be stated on the transcript, items to be stated on the passport, entrance examination results	
	Dissemination of appropriate educational content and support content of the University based on the individual's wishes and aspirations		(a) Consent
Guarantor for applicants	Payment and exemption of entrance examination fees and admission fees; procedures for moving into student dormitory	Name, address, contact information	(b) Performance of the contract
	Contact in case of emergency, etc.		(d) Protect to vital interests
Graduates	Issuance of various certificates, sending of university publicity materials, event information, information on donations, etc., work related to improvement and promotion of education and research, various inspections/investigations/analyses , accreditation evaluation; investigation work requests from the national government, administrative agencies, and other organisations, etc.	Name, address, contact information, student registration at the time of enrolment, other data collected during enrolment	(f) Legitimate interests; strengthening relationships with graduates will lead to the development of the University; Tohoku University alumni "Shuyukai"
	Providing information on reskilling, such as recurrent education based on the individual's wishes and aspirations, and utilising information to support employment and career for current students.	Name, address, contact information, place of employment, student registration at the time of enrolment, other data collected during enrolment	(a) Consent

Applicants for exchange programs and summer programs	Program implementation	Name, participating program, period of acceptance, accepting department, accepting faculty, name of the partner school, name of a person in charge of the partner school, the contact information of the person in charge of the partner school, nationality, gender, date of birth, marital status, health considerations, period of study abroad accommodation, home address, emergency contact information, passport number, email address, scholarship recipient status, language ability	(b) Performance of the contract
	Statistical data creation, analysis of exchange status with overseas partner schools		(f) Legitimate interests; analyse the exchange program and use it to improve the program
	Dissemination of appropriate educational content and support content of the University based on the individual's wishes and aspirations		(a) Consent
Japan Society for the Promotion of Science, Research Fellowship for Young Scientists applicant	Application for Japan Society for the Promotion of Science Research Fellowship for Young Scientists	Name, gender, nationality, date of birth, degree, type of doctoral degree, academic background, research/work history, research topic, current address, name/location of affiliated institution, contact information for screening results	(b) Performance of the contract; provided to Japan Society for the Promotion of Science
Prospective students or prospective employees	Obtaining a Certificate of Eligibility for Status of Residence	Affiliation at Tohoku University, status at Tohoku University, period of acceptance at Tohoku University, planned period of stay, nationality/region, date of birth, name, email address, gender, place of birth, marital status, applicant's occupation, place of residence in the home country, passport number and expiration date, presence or absence of accompanying family members, place of planned visa application, past entry/exit history to	(c) Compliance with a legal obligation; provided to the Immigration Bureau

		<p>Japan, whether or not there has been punishment for a crime, departure from Japan due to deportation or departure order.</p> <p>presence or absence of family members already living in Japan, their place of work/school, residence card number (special permanent resident certificate number), number of years of study, final educational background and school name, (estimated) date of graduation, how to pay for expenses while attending the University, name and phone number of the person who pays the expenses, scholarship provider, research topic, address for receiving the certificate of eligibility, phone number, work history or career, compensation from the University, etc.; amount, address and date of notification of marriage, birth, or adoption</p>	
Persons who wish to be employed by the University (including those whose employment has been decided)	Recruitment selection	Name, age, date of birth, nationality/region, current address, telephone number, email address, educational background, work history, degree, license/certification, permanent residence status, residence status	(b) Performance of the contract
	Procedures at the time of recruitment		
	Contact in case of emergency		(d) Protect to vital interests
Faculty and staff	Human resources	Name, gender, date of birth, current address, housing type, telephone number, educational background, work history, training history, qualifications, language-related study history,	<p>(f) Legitimate interests;</p> <p>to be used for appropriate personnel affairs within the university; to ensure that the university</p>

		English or foreign language test results, health status	functions as a university by placing the right people in the right places and encouraging faculty and staff to demonstrate their abilities
	Payment of salary, travel expenses, etc.	Name, account name, bank name, bank code, branch code, deposit type, account number route, commuting method, marital status, working hours, number of vacation days, reason for taking vacation (evidence materials)	(b) Performance of the contract
	Tax procedures, etc.	Name, date of birth, annual income, address, information necessary for year-end adjustment related declaration function (various insurance premium payment status, existence of dependents, mortgage payment status, etc.)	(c) Compliance with a legal obligation; provided to the tax office
	Procedures for the Ministry of Education, Culture, Sports, Science and Technology Mutual Aid Association or Japan Health Insurance Association	Name, date of birth, presence or absence of dependents, current address, workplace before enrolment, work history at a national institution before enrolment	(b) Performance of the contract; provided to the Education, Culture, Sports, Science and Technology Mutual Aid Association or the National Health Insurance Association
	Labour management	Working hours, overtime duties, reasons for leave, reasons for leave or absence, approval status of leave or absence	(b) Performance of the contract; (c) Compliance with a "legal obligation"

	Health care	Results of health examinations (statutory items), results of health consultations and health guidance (if based on laws), results of re-examination of health examinations (same as legal items), results of interview guidance for employees working long hours, results of interview guidance for those who were judged to be under high stress as a result of stress check	(c) Compliance with a legal obligation
		Results of health examinations (non-statutory items), results of health consultations and health guidance (if not based on laws), results of re-examination of health examinations (excluding items that are the same as legal items), detailed examination of health examinations information for disease management such as cancer screening results, interview guidance for return to work, doctor's opinion to support balancing treatment and work, hospital visits, etc.	(a) Consent
	Liaison with the company to which the employee is transferred or to which the employee is dispatched	Name, address, working hours and days, vacation status (reason for vacation, proof related to vacation), status of business trips, etc.	(b) Performance of the contract; provided to the company to which the employee is transferred or to which the employee is dispatched
	Procedures at the time of retirement	Name, address, account name, financial institution name, account number	(b) Performance of the contract
	Contact in case of emergency	Name, address, phone number, email address	(d) Protect to vital interests
	Confirmation of conflicts of interest	Department, affiliation, job title, employee	(f) Legitimate interests; to

		name, employee number, number of affiliated corporations, corporate name, relationship of financial interests (category, timing/period, amount), details of industry-academia collaboration/concurrent employment (category, period, amount), characteristics of the corporation (corporate form, involvement), response status (for some executives and employees involved in organisational decision-making and those conducting research using Ministry of Health, Labor and Welfare research funds/AMED research funds, spouses and others who make the same living as the individual; also record first-degree relatives)	understand the situation of conflicts of interest in the activities of industry-academia-government collaboration activities and other social contribution activities by executives, employees, and the university/department as an organisation; to appropriately manage conflicts of interest at our university
	Publication of faculty information under the provisions of the School Education Act and other laws and regulations	Name, educational background, work history, degree	(c) Compliance with a legal obligation
	Management of the campus information network, identity verification when using each system, and response in the event of a security incident.	Tohoku University (TU) ID, staff number, staff identification card ID, user classification, password, certificate information, start date of use, end date of use, sub ID, sub ID password, Kanji name, Kana name, English name, maiden name Kanji name, maiden name in kana, date of birth, gender, telephone number, fax number, university-wide email address, other email address, student email address, contact email address, alias address, appointment/exit	(b) Performance of the contract

		classification code, appointment/exemption classification, official name code, job type code, affiliation code, department code, charge code, extension code, Google Cloud Directory Sync ID(GCDSID), employee ID, Google Workspace initial password, Microsoft 365 initial password, Google Workspace name, past university email address, past alias address	
	Contact in case of emergency	Name, address, contact information	(d) Protect to vital interests
Faculty and staff families	Tax matters	Name, date of birth, relationship, annual income, address, and status of disability, if any	(c) Compliance with a legal obligation; provided to tax office
Donor	To manage donations, issue receipts, etc., and express gratitude; to respond to requests and inquiries regarding the Tohoku University Fund and to send materials; to publicise and provide information regarding the Tohoku University Fund; to operate the Tohoku University Fund and other activities related to its operation (survey, analysis, implementation of operational plans, etc.)	Name, gender, date of birth, address, telephone number, fax, e-mail; relationship with the University, affiliation, position, TU ID, company/organisation name, affiliation/position, year of joining, year of leaving the company	(a) Consent
Researchers conducting joint research with Tohoku University, employees of companies, etc.	Contracts related to joint research, procedures and management related to inviting researchers	Name, affiliation, role in joint research	(b) Performance of the contract
Participants in events sponsored by the University	Procedures for participating in events held by the University; providing services and information related to events, etc. held by the University	Name, gender, country/region, company/school name, position, email address	(b) Performance of the contract
	Work related to improving and		(f) Legitimate

	promoting education and research (including various questionnaires)		interests; improvements to events, etc. held by the university
	Providing information about the University that the person desires in connection with the event		(a) Consent
Visitors to the University's website	Displaying the appropriate information for each website visitor	Cookie data	(f) Legitimate interests; to display appropriate information for each website visitor
Invitees to the University	Travel expense payment procedures, etc.	Name, affiliation, title, nationality, date of birth, address (residence), affiliation address, e-mail	(b) performance of the contract; Provided to travel agencies, etc.
Subjects of academic research conducted by the University	Promotion of academic research	The information to be obtained will differ depending on the individual research, and will be notified separately by the research representative.	(a) Consent

7. Sources of personal data

The University acquires personal data from the following sources in order to conduct the business described in the preceding paragraph:

(1) Data subjects located in the EEA and the UK (or the holder of parental responsibility

over the child if the data subject is under the age of 16 [or under the age, stipulated by the domestic law of a country where GDPR applies] when personal data are being handled) can prove that they have given their consent);

(2) Academic research institutions located within the EEA and the UK with which the University has a joint research project;

(3) Public information (e.g., information on the Internet);

(4) Information via social media (e.g. Twitter, Facebook, etc.).

8. Retention period of personal data

Personal data recorded in corporate documents owned by the University will be retained for the period specified by Article 21 of the Regulations on Management of Corporate Documents at National University Corporation Tohoku University, depending on the type of corporate document recorded.

Personal data acquired for academic research purposes will be stored for a period determined by the heads of each department as part of their responsibility as set forth in Article 4 of the Regulations for the Promotion of Fair Research Activities at Tohoku University.

9. The rights of the data subject

Data subjects have the following rights:

(1) Right of access

The data subjects shall have the right to access their personal data and other information as defined in the GDPR.

(2) Right to rectification

The data subjects shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her.

(3) Right to erasure (right to be forgotten)

A data subject shall notify the controller if his or her personal data fall under any of the matters stipulated below. You may request that such personal data be deleted without undue delay.

(a) The personal data are no longer necessary in relation to the purpose for which it was collected or otherwise processed;

(b) The data subject withdraws consent on which the processing and there is no other legal ground for the processing;

(c) The data subject objects to the processing pursuant to Article 21(1) of the GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2) of the GDPR;

(d) The personal data have been unlawfully processed;

(e) The personal data have to be erased for compliance with a legal obligation in EU or Member State law to which the controller is subject;

(f) The personal data have been collected in relation to the offer of information society services referred to in Article 8(1) of the GDPR.

(4) Right to restriction of processing

The data subject shall have the right to obtain from the controller restriction of processing any personal data that fall under Article 18(1) of the GDPR.

(5) Right to data portability

Where Article 20(1) of the GDPR applies, the data subject shall have the right to receive the personal data concerning him or her which he or she has provided to a controller, in a structured, commonly used, and machine-readable format. In addition, the data subject shall have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided.

(6) Right to object

The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on the provisions of Article 5(5) or (6), in the case of profiling pursuant to said provisions. You can object at any time. For details, please refer to "10. Right to object to processing" below.

(7) Right not to be subject to a decision based solely on automated processing, including profiling

The data subjects have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him

or her.

(8) Right to lodge a complaint with a supervisory authority

Every data subject shall have the right to lodge a complaint at any time with the national supervisory authority in the EEA and UK where the data subject is located.

10. Right to object to processing

The data subject has the right to object at any time to processing of his or her personal data pursuant to Article 5(5) or (6). The handling of personal data here includes profiling. The data subject shall have the right to object at any time to processing of personal data concerning him or her for direct marketing purposes.

11. Providing personal data

The University may provide personal data to third parties listed in Article 6 for the purposes of handling as stipulated in Article 6. However, as a general rule, the special types of data stipulated in Article 9, Paragraph 1 of the GDPR can only be processed with the consent of the data subject.

12. Transfers of personal data

Personal data of data subjects may be transferred to Japan based on an adequacy decision for transfer from the EEA or the UK to Japan, or based on the SCC.

13. Security management measures

Regarding the protection of personal data, the University has taken security management measures at the level stipulated in the Act on the Protection of Personal Information and other related laws and regulations, as appropriate technical and organisational security control measures stipulated in Article 32 of the GDPR.

14. Relationship with the basic policy (privacy policy) regarding personal information protection at National University Corporation Tohoku University of the University

In addition to this Privacy Policy, the basic policy (privacy policy) regarding personal information protection at National University Corporation Tohoku University (hereinafter referred to as the "Basic Policy") applies to personal data. However, if the provisions of the Basic Policy conflict with this Privacy Policy, the provisions of this Privacy Policy shall take precedence.

15. General provision

The University may change this Privacy Policy based on laws and regulations or in accordance with the University's policy. However, personal data collected based on the data subject's consent will not be used for the changed purpose without the consent of the data subject.

Supplementary Provision (Revision: April 1, 2025)

These Basic Policy shall come into force on April 1, 2025.