

## **Regulations Pertaining to the Protection of Personal Information of the School Juridical Person International Christian University**

### **Chapter 1—General Regulations**

#### **(Goal)**

Article 1. These regulations state the basic matters regarding possession of private information on the part of the International Christian University School Juridical Person (hereafter referred to as “the Juridical Person”). These regulations shed light on the duty of the Juridical Person and schools established by the same (heretofore referred to as “the Juridical Person et al”) in their collection, management and use of personal information as well as make a goal of contributing to the protection of a person’s rights and wellbeing.

#### **(Definition of terms)**

Article 2. In these regulations, the term “student” refers to any person who is receiving or will receive education at the schools established by the school Juridical Person in addition to any person who has received or intended to receive education at said schools.

2. In these regulations, the term “faculty and staff” refers to any person who has or had an employment relationship with the Juridical Person, or any person who has or had any direct business with the Juridical Person.
3. In these regulations, the term “related departments” refers to the high school, university, postgraduate courses, research facilities, secretariat, etc. that have been established by the Juridical Person.
4. In these regulations, the term “personal information” refers to something related to students or faculty and staff on the basis of which a certain person either is or can be identified.
5. In these regulations, the term “held personal information” refers to information either acquired or created by the faculty and staff (including that which is handled mechanically) for organized use by the Juridical Person.
6. In these regulations, the term “individual(s)” refers to person(s) identified in said personal information.

#### **(Duty)**

Article 3. As per these regulations, the Juridical Person takes steps to protect the rights and wellbeing of the individuals while keeping in mind the usefulness of personal information.

2. Under the Chair of the Board of Trustees, University President and High School Principal of the Juridical Person, must direct the steps to be taken in order to enforce that which is set out in these regulations as well as plan for the protection of personal information as it is collected, managed and used by the responsible parties of related departments.
3. The responsible parties of related departments must take action to manage personal information properly as well as take other necessary steps as per the advice, guidance and recommendations of the President, Headmaster and Committee on the Protection of Personal Information.
4. While observing these regulations and related laws and ordinances, the faculty and staff of the

Juridical Person must not make available to any third party content of any personal information to which they have knowledge or make use of said personal information towards any inappropriate ends.

(The establishment of a party responsible for the secure management of personal information)

Article 4. In order to plan the appropriate management and secure protection of personal information, department heads must appoint a person responsible for the secure management of personal information (heretofore referred to as "manager(s) responsible").

## Chapter 2—Limits on the Acquisition and Use of Personal Information

(Limits on the acquisition of personal information and public announcements)

Article 5. When acquiring personal information, the manager responsible must, with the exception of those things provided for by school and work regulations and within the acceptable limits of the regulations, make a clear statement specifying the use of personal information, either through public announcement or to the individual as well as collect only the personal information necessary for the achievement of said task.

2. When acquiring personal information the manager responsible must collect said information by proper and fair means directly from the individual excepting cases when any of the following may be true.

- (1) When the individual has granted consent
- (2) When something is set down in laws and ordinances
- (3) When it is necessary to save the individual's life, bodily safety or possessions.
- (4) When the Committee on the Protection of Personal Information has confirmed that there is a just reason pertaining to the carrying out of business of the Juridical Person et al.

(Notification of the acquisition of personal information)

Article 6. In advance of collecting personal information in order to carry out the business of the Juridical Person et al., the manager responsible must notify the Committee on the Protection of Personal Information of the following matters and receive approval from said committee.

- (1) Type of personal information
- (2) Intended use of the personal information
- (3) From where the personal information will be collected
- (4) Method of collecting the personal information
- (5) Details of the personal information to be used
- (6) Form in which the information will be recorded
- (7) Name of the person responsible for the secure management this personal information
- (8) Other information deemed necessary by the Committee on the Protection of Personal Information

2. In the event that submitted information based on the above points either changes or becomes no longer valid, the manager responsible must provide advance notice to, and receive approval from the Committee on the Protection of Personal Information.

(Limits on the use and furnishing of personal information)

Article 7. The manager responsible must not use or furnish collected personal information in any way other than the specified intended use. However, this limitation may not exist under any of

the following circumstances.

- (1) When the individual has granted consent
- (2) When something is set down in laws and ordinances
- (3) When it is necessary to save the individual's life, bodily safety or possessions
- (4) When the Juridical Person's offices, schools or research have need of the information and it is clear that there is no danger of unjust infringement on the wellbeing of the individual
- (5) When information is requested by a government office
- (6) When information will be used solely for the purposes of academic research or creation of statistical data and it is clear that there is no danger of unjust infringement on the wellbeing of the individual
- (7) Other occasions which the Committee on the Protection of Personal Information have deemed just

(Notification of the use or furnishing of personal information for purposes other than those intended)

Article 8. As per the rules set out in Article 7, section 1, the manager responsible must promptly notify the Committee on the Protection of Personal Information in the event that personal information is used or furnished in any way other than that which was specified for its collection.

(Proper management of personal information)

Article 9. For the proper management of held personal information, the manager responsible must take steps to uphold the following.

- (1) Prevention of loss of information
- (2) Prevention of altering or leaking of information
- (3) Maintaining current and correct information
- (4) Timely disposal or destruction of information which has become irrelevant

(Personal information involved in work consigned to outside parties)

Article 10. When personal information becomes involved in work consigned to outside parties, the manager responsible must conclude a contract with the concerned party insuring the security of held personal information.

2. When concluding the contract as per the preceding clause, the manager responsible must provide a copy of the contract to the Committee on the Protection of Personal Information in advance, and subsequently receive approval.

(Joint use of personal information)

Article 11. In the event that held personal information is to be used jointly with a specified party, the manager responsible must receive prior approval subsequent to notifying the Committee on the Protection of Personal Information.

- (1) An itemization of the held personal information intended for joint use
- (2) The name of the party with whom the personal information is intended for joint use
- (3) The purpose of the information's joint use
- (4) The names of the persons from each party who are responsible for the security of the personal information to be used
- (5) The manner of notification or public announcement regarding this joint use

### Chapter 3—Release and Corrections to Personal Information

#### (Reading of notifications)

Article 12. Students, faculty and staff will be able to clearly see that s/he is the individual in question in approved materials (according to article 6) and notifications (according to article 8).

#### (Releasing personal information related to oneself)

Article 13. Students, faculty and staff will be able to request the release of their own personal information.

2. The manager responsible must release personal information when such a request is made. However, it should be understood that there are times when all or part of an individual's personal information may not be released due to the nature of information contained in the individual's screening, evaluation, medical diagnoses, etc., or if releasing the information would be deleterious to the operations, education, or research of the Juridical Person.

3. In the event that all or a part of an individual's personal information will not be released, that reason will be made in writing and sent to the individual.

4. In requests for release of personal information as mentioned in section 1 of this article the individual will provide identification and submit in writing the following to the manager responsible:

- (1) Affiliation and name
- (2) Title of personal information and the record's details
- (3) Reason for request

#### (Corrections and deletions of personal information related to oneself)

Article 14. If students, faculty and staff recognize an error in their personal information, as per the process outlined in section 4 of the preceding article requests to correct or delete information may be made to the manager responsible of the appropriate department.

2. Upon receipt of request for correction or deletion as per the preceding section of this article, after a timely investigation managers responsible must take the necessary steps and inform the individual of the result of their request. In the event that no correction or deletion is to be made, the Committee for the Protection of Personal Information will be notified as the reason, and after the manager responsible has received approval that reason will be made in writing to the individual.

### Chapter 4—Filing Complaints

#### (Filing complaints)

Article 15. In the event that a person has a complaint regarding handling of their own personal information in response to a request made in accordance with the previous two articles, individuals may identify themselves and file a complaint with the Committee on the Protection of Personal Information.

2. As per the preceding section of this article, if the Committee on the Protection of Personal Information does receive a complaint it will conduct careful deliberations and notify the individual in writing regarding their decision.

3. If necessary the Committee on the Protection of Personal Information may seek the testimony of either the complainant or the manager responsible.

4. Complaints to the Committee on the Protection of Personal Information should be made in writing and include the following.
  - (1) Position and name of the complainant
  - (2) Details of the complaint
  - (3) Reason for complaint

#### Chapter 5—The Committee on the Protection of Personal Information

Article 16. In order to achieve the goals set out in these regulations the School Juridical Person will establish a Committee on the Protection of Personal Information (hereafter referred to as the “Committee”) for both the University and High School.

##### (Authority)

Article 17. In addition to those set out in the preceding articles, the Committee will have the following authorities.

- (1) It will deliberate and decide the important matters concerning personal information
- (2) For the furthering of deliberations it will request necessary materials and seek opinions from managers responsible
- (3) Based on those deliberations it will provide advice, guidance and recommendations to the managers responsible

##### (Composition)

Article 18. The Committee will be composed of members conforming to the following.

- (1) The University’s Committee will be composed of the Vice President of Academic Affairs, the Dean of Graduate Studies, the Dean of the College of Liberal Arts, the Director of the University Secretariat, and the Director of General Affairs.
- (2) The High School Committee will be composed of the Head Teacher, the Director of the Center for Returnee Education, and the Director of the High School Administrative Offices.
2. The Committee will have separate members serving as the chair, vice chair and secretary. The Committee’s members will choose from among themselves who will serve as the chair. The chair will appoint a vice chair and secretary.
3. The chair will call meetings and manage their proceedings.
4. The vice chair will assist the chair. In the event that the chair is absent or some accident occurs the vice chair will assume the chair’s duties.
5. If the chair deems it necessary, s/he may call on another member of the full-time faculty or staff to sit with the committee.
6. Pertaining to the filing of complaints pursuant to article 14, if a complaint is directly related to a committee member said member may not sit in on deliberations for the concerned complaint.

##### (Term of office)

Article 19. Members will serve as long as they hold the position that carries the responsibility of serving on the Committee

2. If a member is unable to fulfill the duties of their office within the Committee, another member will serve out the remainder of the term.

##### (Operation)

Article 20. The Committee may not hold meetings without the majority of its members present.

2. Committee decisions will be made by agreement of a simple majority of members present.
3. When deemed necessary the Committee may call for outside parties to be present and present their testimony.
4. Excepting those matters outlined above, the Committee will decide its own operations.
5. The Committee may form subcommittees as necessary.

(Office work)

Article 21. The Committee's office work will be conducted by the Department of General Affairs in the case of the University, and by the High School Administration Office in the case of the High School.

(Confidentiality)

Article 22. Committee members must not make known to any other persons personal information that comes before them in the Committee. This must be abided by even after a member's term on the Committee has ended.

## Chapter 6—Miscellaneous

(Interpretation of regulations)

Article 23. In the event of doubt regarding the carrying out of these regulations, the Committee will make rulings on their clarification.

(Enactment of regulations)

Article 24. Detailed rules necessary for the enforcement of these regulations will come up for discussion within the Committee as well as the Senate and will be decided by the President in the case of the University, and by the Headmaster in the case of the High School.

(Reform and/or abolition of regulations)

Article 25. The reform and/or abolition of regulations herein will come up for discussion within the Board of Trustees and decided by the Chairman of the Board.

### Provisions:

(Term of enforcement)

1. These regulations shall be applied retroactively from April 1, 2005.

(Steps toward progress)

2. Concurrent with the enactment of Chapter 2 of these regulations notifications will be made to the Committee by March 31, 2006 regarding personal information currently in possession as pertaining to Chapter 2, Articles 2, 6, 8, 10 (section 2) and 11.