

SPRIX Education Foundation Privacy Policy

Policy on the Handling of Personal Information

The SPRIX Education Foundation (hereafter referred to as "the Foundation") establishes the following policy regarding protection of personal information. The Foundation strives to maintain public trust by establishing a system for the protection and management of personal information, complying with laws and regulations, and working towards continuous improvement.

Management of Personal Information

The Foundation appoints an Information Management Officer and takes measures such as controlling access to personal data, restricting data transfer methods, and preventing unauthorized external access in order to prevent the leakage, loss, or damage of personal data handled by the Foundation and to ensure appropriate security control measures. In the event of a leakage, loss, damage, or other security compromise of personal data held by the Foundation that is determined by the Rules of the Personal Information Protection Commission to pose a significant risk to individual rights and interests, the Foundation will notify the individual concerned as stipulated by said Rules (except in cases where notification to the individual is difficult and alternative measures necessary to protect the individual's rights and interests are taken).

Acquisition of Personal Information

The Foundation acquires personal information through legal and fair means.

Use of Personal Information

Except as permitted by law, the Foundation uses personal information only as necessary for its business operations. Such use is limited to the purposes listed below and purposes reasonably relevant thereto:

1. To send information, conduct surveys, notify application results, and provide various communications to applicants or participants in projects operated by the Foundation.
2. To respond to inquiries, maintain records, and conduct surveys for those who contact the Foundation.
3. To provide information from the Foundation and distribute publications (including email newsletters).
4. To create and analyze statistical data based on attributes, including processing personal information into a form that cannot identify specific individuals (e.g., by removing or irreversibly replacing personal identifiers).

Note: The Foundation will not handle personal information beyond the scope necessary to achieve these purposes without obtaining the individual's prior consent. Furthermore, the Foundation will not use personal information in a manner that may encourage or induce illegal or improper acts. If the personal information provided by an individual when applying for a project operated by the Foundation includes Sensitive Personal Information, the individual shall be deemed to have consented to the Foundation's use of such information within the scope of the above-mentioned purposes.

Provision of Personal Information to Third Parties

The Foundation will not disclose or provide personal data to third parties, except as required by law or with the prior consent of the individual. However, the following cases shall not be considered disclosure to third parties:

1. When providing personal data in connection with outsourcing all or part of the handling of personal data within the scope necessary to achieve the purpose of use.
2. When personal data is provided as a result of business succession due to a merger or other reasons.

3. When personal data is shared for "Joint Use" with specific parties, provided that the individual has been notified in advance or the following information has been made readily accessible to them:
 - The fact of joint use.
 - The items of personal data to be used.
 - The scope of the joint users.
 - The purpose of use.
 - The name, address, and representative of the party responsible for managing said data.

Entrustment of Personal Information

The Foundation may provide personal data to a third party in connection with outsourcing all or part of the handling of personal data managed by the Foundation to said third party, within the scope necessary to achieve the purposes of use specified above. When outsourcing, the Foundation carefully selects contractors that have sufficient personal information protection systems in place and exercises necessary and appropriate supervision over them through contracts or other means to ensure safety.

Disclosure, Correction, Addition, Deletion, and Suspension of Use of Personal Information

The Foundation strives to keep personal data accurate and up-to-date within the scope necessary to achieve the purpose of use. If an individual wishes to request disclosure, correction, addition, deletion, or suspension of use of his/her retained personal data, the Foundation will respond in accordance with the Act on the Protection of Personal Information within a reasonable scope and method, unless otherwise specified by law. Please submit these requests to the Foundation via trackable mail, accompanied by identity verification documents. The Foundation's basic response methods are as follows:

1. **Disclosure:** When an individual requests the disclosure of retained personal data identifying them or records of provision to third parties (excluding cases specified by Cabinet Order where revealing the existence of such data would harm the public interest or other interests), the Foundation will disclose such information without delay within the scope prescribed by law, except where non-disclosure is permitted by law. Disclosure will be made by the method designated by the individual (or by delivery of a document if disclosure by said method requires excessive cost or is otherwise difficult). If the Foundation decides not to disclose the information, if the information does not exist, or if disclosure by the designated method is difficult, the Foundation will notify the individual of the decision without delay. Please note that a fee of 880 JPY (tax included) will be charged per request for disclosure of personal data. This fee is subject to change based on revisions to the consumption tax rate.
2. **Correction, Addition, or Deletion:** If an individual requests the correction, addition, or deletion of the content of retained personal data identifying them on the grounds that the content is factually incorrect, the Foundation will conduct necessary investigations without delay within the scope necessary to achieve the purpose of use, and based on the result, correct the content of said retained personal data (except where special procedures are prescribed by other laws).
3. **Suspension of Use or Deletion:** If retained personal data identifying an individual is handled in violation of the purpose of use, handled in a manner that may encourage or induce illegal or improper acts, or was acquired by deceit or other improper means, the individual may request the suspension of use or deletion (hereinafter referred to as "Suspension of Use or Deletion") of said retained personal data. If the request is found to be valid, the Foundation will implement the Suspension of Use or Deletion without delay to the extent necessary to correct the violation. However, this shall not apply if the Suspension of Use or Deletion requires excessive cost or is otherwise difficult, and alternative measures necessary to protect the rights and interests of the individual are taken. The Foundation will notify the individual without delay upon implementing the Suspension of Use or Deletion or deciding

not to do so.

4. **Suspension of Third-Party Provision:** If retained personal data identifying an individual is provided to a third party in violation of laws or this Policy, the individual may request the suspension of provision of said retained personal data to the third party. If the request is found to be valid, the Foundation will suspend the provision to the third party without delay. However, this shall not apply if suspending the provision requires excessive cost or is otherwise difficult, and alternative measures necessary to protect the rights and interests of the individual are taken.
5. **Other Cases:** An individual may request the Suspension of Use or Deletion, or suspension of provision to a third party in the following cases:
 - If the Foundation no longer needs to use the retained personal data identifying the individual.
 - If a situation concerning the security of personal data handled by the Foundation (such as leakage, loss, or damage) has occurred, which poses a significant risk to the individual's rights and interests as defined by the Rules of the Personal Information Protection Commission.
 - If there is a risk that the individual's rights or legitimate interests may be harmed by the handling of said retained personal data. If the request is found to be valid, the Foundation will implement the Suspension of Use or Deletion or suspend provision to the third party without delay to the extent necessary to prevent infringement of the individual's rights and interests. However, this shall not apply if such measures require excessive cost or are otherwise difficult, and alternative measures necessary to protect the rights and interests of the individual are taken. The Foundation will notify the individual without delay upon implementing such measures or deciding not to do so.

Complaints and Inquiries

For inquiries regarding personal information, please contact the **Contact Desk** below.

Contact Desk

Administrative Office of the SPRIX Education Foundation

E-mail: info@sprix-foundation.org

Use of Cookies

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Use of JavaScript

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SPRIX Education Foundation

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Chairman: Hiroyuki Tsuneishi