

# Privacy Policy for the EEA and the UK GDPR

Ryugaku Journal Inc. (“**Ryugaku Journal**”) may have occasion to collect and process Personal Data (as defined below). This Privacy Policy (this “**Policy**”) applies to the processing of Personal Data concerning data subjects in the European Economic Area (“**EEA**”) in accordance with the Regulation (EU) 2016/679 (General Data Protection Regulation, the “**GDPR**”) and data subjects in the United Kingdom (the “**UK**”) in accordance with the UK GDPR as defined in the Data Protection, Privacy and Electronic Communications (Amendments etc.) (EU Exit) Regulations 2019 (the “**UK GDPR**”).

## 1. Personal Data

In this Policy, Personal Data means any data relating to an identified or identifiable natural person (“**Personal Data**”). RYUGAKU JOURNAL may acquire and process Personal Data, including the information written in the counsel sheet or program application form such as your name, address, telephone number, gender, date of birth, nationality, occupation, e-mail address, existing disease etc.

## 2. Use of Personal Data

RYUGAKU JOURNAL acquires and processes Personal Data for the following purposes:

- Providing services to relevant students;
- Legitimate business interests, such as undertaking business research and analysis or managing the operation of the business;
- Public relations, such as responding to inquiries;
- Engaging in marketing and business development activities in relation to the services. This may include sending client newsletters, marketing communications and other information that may be of interest to them;
- Defense of certain rights or interests;
- Compliance with legal and regulatory obligations that RYUGAKU JOURNAL has to discharge; and
- Managing customer relationships

RYUGAKU JOURNAL relies on the following legal grounds to process Personal Data:

- The data subject’s consent expressly given to process his/her Personal Data in such manner. The data subject may withdraw his/her consent to this processing

at any time; however, this will not affect the lawfulness of any processing carried out before withdrawal of the consent;

- Entering into a contract with a data subject or performing obligations under a contract with a data subject;
- Legitimate interests, some examples of which are given above; and
- Compliance with applicable laws or regulations

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations.

### **3. Use of Cookies**

We use the support services of marketing companies to manage and optimize our Internet operations and communications, and to measure the effectiveness of our advertising and how visitors use our website. For this purpose, we use web beacons and cookies provided by marketing companies on our website to collect access data and perform integrated website analysis (Google Analytics). In this case, if it is necessary to obtain "cookie information" that can be used to identify individuals by matching it with other information in the analysis or analysis of information, we will obtain your consent before obtaining such information. There are two types of cookies: those that store information sent directly to our site (first-party cookies) and those that are sent to other companies whose services our site uses (third-party cookies). The use of Strictly Necessary cookies, which are first-party cookies, corresponds to legitimate processing as defined by Article 6.1 (Lawfulness of processing) of the GDPR. You also have the right to object to the processing of your data for statistical purposes as defined in Article 89(1) of the Law (Safeguards and derogations relating to processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes). In addition, you have the right to object to the processing of your data for statistical purposes as defined in Article 21, paragraph 6 of the Law (Right to object). In this case, you may withdraw your consent to our use of cookies at any time in order to exercise your rights as a data subject. For information on withdrawing consent and disabling cookies, please refer to our Cookie Policy, which can be found on our website.

### **4. Disclosure to Third Parties**

RYUGAKU JOURNAL may supply or disclose Personal Data, without the data subjects' prior consent, to RYUGAKU JOURNAL's group companies, insurance companies and

other third parties that are RYUGAKU JOURNAL's service assignees. RYUGAKU JOURNAL may also supply or disclose Personal Data to third parties when it is necessary for some other justifiable reason permitted by the laws and regulations.

## **5. Cross-Border Transfer**

Personal Data may be transferred to entities in countries or jurisdictions outside the EEA and UK, such as Japan, if required for the purposes as described above. Please note that such countries or jurisdictions may not have the same data protection laws as the EEA and UK and will not afford many of the rights conferred upon data subjects in the EEA and UK. RYUGAKU JOURNAL will ensure that any such international transfers are made subject to appropriate and suitable safeguards as required by the GDPR, the UK GDPR or other relevant laws. When doing so, RYUGAKU JOURNAL will comply with applicable data protection requirements and take appropriate safeguards to ensure the security and integrity of Personal Data.

## **6. Retention of Personal Data**

RYUGAKU JOURNAL will retain Personal Data for the period necessary to fulfill the purposes outlined in this Policy, unless a longer retention period is required or permitted by law.

## **7. Rights of Data Subjects**

Data subjects have the right to access, request correction of, request deletion of, request the limitation of processing of, object to the processing of, and request the data portability of their Personal Data retained by RYUGAKU JOURNAL. When RYUGAKU JOURNAL receives a request based on the right specified above, RYUGAKU JOURNAL shall conduct any necessary investigation without delay and provide data subjects or nominated third parties with Personal Data or respond to such rights without delay.

## **8. Right to Lodge Complaint with Data Protection Authority**

Data subjects have the right to lodge a complaint with the local data protection authority if they have a complaint with regard to RYUGAKU JOURNAL's processing of their Personal Data.

## **9. Contact**

For any questions about this Policy, RYUGAKU JOURNAL's privacy practices or your rights described in "Section 6. Rights of Data Subjects", please contact us at the following:

For all data subjects

Department : RYUGAKU JOURNAL INC. Customer Service Office

E-mail address : [rj-houmu@ryugaku.co.jp](mailto:rj-houmu@ryugaku.co.jp)

Phone number : 03-5312-4421

EU Representative for PLANIT // LEGAL

Data subjects in the EEA : Bischof Freund Schmidt Partnerschaft von Rechtsanwälten mbB  
Neuer Wall 54, 20354 Hamburg, Germany

E-mail address : [mail@planit.legal](mailto:mail@planit.legal)

UK Representative for TMI Associates London LLP

Data subjects in the UK : Citypoint One Ropemaker Street London EC2Y 9SS, UK

E-mail address : [london@tmi.gr.jp](mailto:london@tmi.gr.jp)

Enacted as of 2019/Feb/1

Revised as of 2022/Aug/1