

Approved by the trustee responsible for research on June 17, 2019

Confidentiality Policy for Industry-Academia-Government Collaboration

1. Purpose

Kanazawa University (the “University”) recognizes industry-academia-government collaboration as one of the University’s important missions. The University therefore declares its commitment to aggressively promoting such tripartite collaboration under the Kanazawa University Policy on Industry-Academia-Government Collaboration and Intellectual Property Activities. To strengthen trust between the University and its partners in industry-academia-government collaboration projects, the University at minimum is required to properly control confidential information accessed by the University in the course of such collaborative activities (“Confidential Information”) and to prevent intentional or unintentional leaks of Confidential Information.

To encourage the University’s faculty and staff members and partners in industry-academia-government collaboration projects to share Confidential Information necessary for promoting those projects and to achieve superior results through their collaborative research, while taking into consideration the University’s public nature and its influence on education and research, the University shall realize systematic management of Confidential Information to further facilitate industry-academia-government collaboration and to contribute to society. To this end, the University has established this Confidentiality Policy for Industry-Academia-Government Collaboration as follows to set out the basic philosophy for controlling Confidential Information.

2. Definitions

In this Policy, “Collaborative Project” means a collaborative research project or contract research project involving the University’s access to Confidential Information. If, however, all project partners in a research project are a university or public institution, such collaborative projects are, in principle, not included in the scope of Collaborative Projects.

3. Scope of Persons and Information

- (1) This Policy applies to the University’s faculty and staff and those who participate in a Collaborative Project as a research collaborator (including students who have attained the age of majority). Faculty and staff in this context means academic staff, other staff or researchers hired by the University.
- (2) This Policy governs information and tangible items containing or embodying some information as illustrated below, which the University is obligated to keep confidential under an agreement with the relevant project partner. However, confidential information containing personal information pertaining to clinical research is excluded from the scope of Confidential Information governed by this Policy.
 - (i) Information and tangible items designated as being confidential by a partner in a Collaborative Project
 - (ii) Agreements concluded by the University for Collaborative Projects (limited to those designated as being confidential)

- (iii) Outcomes from a Collaborative Project which remain undisclosed and which cannot be publicly disclosed before giving notice to the relevant project partner
- (iv) Know-how designated as being confidential under an applicable agreement based on consultation between the University and a project partner
- (3) Given that the University may receive requests for disclosure to be made under the Act on the Protection of Personal Information Held by Incorporated Administrative Agencies, etc., such requests need to be properly addressed in the context of operating this Policy.

4. Basic Principles

Matters necessary for operating this Policy are specified in the Confidentiality Guidelines for Industry-Academia-Government Collaboration (the "Guidelines"). Concrete methods and procedures for controlling Confidential Information are specified in the Confidential Information Management Manual for Industry-Academia-Government Collaboration (the "Manual").

The University is, in general, expected to publicly disclose its own research outcomes. With this stance in mind, the information to be controlled hereunder shall be limited to the Confidential Information described in Section 3 (Scope of Persons and Information) to prevent excessive or unwanted control on research information from impeding the University's efforts to achieve its primary mission.

Confidential Information shall be controlled basically in the following manner: a faculty or staff member in charge identifies Confidential Information, classifies the identified information into specified categories based on the degree of importance and burden of management in accordance with the Guidelines, and controls such information by category.

If students are asked to participate in industry-academia-government collaboration, full consideration must be given to the right of students to receive education and to their need to give a higher priority to activities related to publishing their research outcomes or job-searching activities. Therefore, the students' own free will must be primarily respected, and they should not be forced to assume excessive responsibility.

5. Awareness-Raising Activities

The University shall endeavor to stay abreast of domestic and international trends concerning the control of Confidential Information in relation to industry-academia-government collaboration, raise awareness about the control of such information among those who are required to adhere to this Policy, and familiarize them with the University's related guidelines, manuals and rules. Those to whom this Policy applies shall, jointly with the University, adhere to the University's policies and guidelines concerning the control of Confidential Information for industry-academia-government collaboration.

6. Organizational Framework

(1) Chief Information Officer

The University shall have a Chief Information Officer authorized to make final decisions in relation to important issues concerning the control of Confidential Information at the University. The University's president is assigned to this position.

(2) Chief Confidential Information Supervisor

The University shall have a Chief Confidential Information Supervisor responsible for

supervising the control of Confidential Information at the University (the “Chief Supervisor”). The trustee responsible for research at the University is assigned to this position.

(3) Confidential Information Supervisor

To systematically control Confidential Information, the University shall have a Confidential Information Supervisor, who shall be selected from among the academic staff attached to the Frontier Science and Social Co-creation Initiative and appointed by the Chief Supervisor. The Confidential Information Supervisor shall familiarize the University’s faculty and staff with the Chief Supervisor’s instructions, notices, requests and other messages and respond to inquiries or requests for advice from faculty and staff in connection with the control of Confidential Information.

(4) Confidential Information Administrator

To systematically control Confidential Information, each department of the University shall have a Confidential Information Administrator. A leader of the faculty in each department who need to access Confidential Information shall be assigned to this position.

7. Compliance

In pursuing efforts to promote industry-academia-government collaboration, the University shall comply with the Unfair Competition Prevention Act, develop a scheme for seeking advice from compliance experts, and endeavor to prevent disputes involving confidentiality breaches.

8. Revision or Abolition

This Policy shall be reviewed and revised as and when necessary to keep pace with changes in social needs or circumstances surrounding the University.