

個人資料保護政策聲明

本校114學年度個人資料保護政策聲明【網路公告版】

～依據教育部「115-116年度大專校院學生健康資訊系統維運及健康資料分析計畫」

本校提供114學年度經加密而無法辨識個人的學生層級健康檢查、生活型態及自我健康評估相關資料給予教育部以及計畫執行單位國立臺灣師範大學健康促進與衛生教育學系，由該校透過其所建置大專校院學生健康資訊系統進行資料分析，除確保本校學生健康檢查相關資料之安全與品質外，並提升學校衛生相關工作之效能。教育部訂有「115-116年度大專校院學生健康資訊系統維運及健康資料分析」計畫，其目標乃為建立全國大專校院學生之健康狀況與健康行為監測系統並進行資料分析、建立大專校院學生健康自主管理之機制，以作為學校健康管理、健康促進以及政府政策分析與擬訂之依據。

一、法規依據：

- (一)依《學校衛生法》第8條規定，學校應建立學生健康管理制度，定期辦理學生健康檢查；必要時，得辦理學生及教職員工臨時健康檢查或特定疾病檢查。
- (二)依《學生健康檢查實施辦法》第8條第1項規定，學校應將學生健康檢查及矯治結果，依規定格式予以記錄，並建檔、統計。
- (三)本校及教育部係依《個人資料保護法》第6條、第8條、第9條、第15條、第16條、第19條、第20條之蒐集、處理或利用及告知等規定辦理。

二、蒐集、處理、利用及目的內外使用：

- (一)本校依《學校衛生法》第8條及《個人資料保護法》第6條、第8條、第9條、第15條、第19條，參與上述教育部計畫，於特定目的內蒐集及利用相關資料：
 - 1. 一般個人資料：依《學校衛生法》第8條及《個人資料保護法》第15條或第19條之特定目的規定辦理。
 - 2. 特種個人資料：依《個人資料保護法》第6條、第8條、第9條之規定辦理蒐集、處理、利用及告知事宜。
- (二)教育部基於學校衛生及為統計或學術研究之需要、依據《學校衛生法》之旨趣及《個人資料保護法》第6條第1項第1款、第2款、第4款、第5款及第9條第2項第4款，而蒐集及主張特定目的外之利用：
 - 1. 一般個人資料：依《個人資料保護法》第16條或第20條之特定目的外利用規定辦理。
 - 2. 特種個人資料：依《個人資料保護法》第6條、第8條、第9條之規定辦理蒐集、處理、利用及告知事宜。

三、健檢資料之類別說明：

- (一)本校依《個人資料保護法》第6條第1項第1款、第2款、第2項，第8條第1項與其施行細則第10條第1款有關法定職務之規定，蒐集、處理及利用上述學生健康個資；其中包括但並不限於：依據「特定目的及個人資料之類別」(民國101年10月01日施行)之特定目的：○一二公共衛生或傳染病防治、○六四保健醫療服務、○七二政令宣導、○七三政府資訊公開、檔案管理及應用、一〇九教育或訓練行政、一五六衛生行政、一五七調查、統計與研究分析、一五九學術研究，而蒐集、處理及利用識別類之C〇〇一辨識個人者；特徵類之C〇一

個人資料保護政策聲明

本校114學年度個人資料保護政策聲明【網路公告版】

~依據教育部「115-116年度大專校院學生健康資訊系統維運及健康資料分析計畫」

個人描述、C○一二身體描述、C○一三習慣、C○一四個性；健康與其他類之C一一健康紀錄...等等。

- (二)本校擬提供之資料詳細內容如附件，其中，學生基本資料僅提供下列欄位予教育部：學校代號、學生學制別、出生年份、出生月份、血型、性別及戶籍縣市。教育部針對以上之去識別化之特種個人資料依《個人資料保護法》第6條第1項第2款、第4款及第5款規定辦理，一般個人資料依據同法第16條及第20條辦理。

四、健檢資料利用之期間、地區、對象及方式：

- (一)本校為符合《個人資料保護法》第18條及第27條，及其施行細則第12條，本校依教育部之建議，遵循標準作業流程進行學生層級資料加密之工作，上傳至教育部建置之「大專校院學生健康資訊系統」，並僅提供教育部及國立臺灣師範大學健康促進與衛生教育學系進行資料分析。後續所進行之資料統計分析，不會以個人資料的方式呈現。
- (二)教育部之計畫存續期間內，資料蒐集、處理及利用皆限於中華民國領域內，使用之範圍限於職權人員與獲授權人員。
- (三)教育部將運用上述資料進行政策分析，分析結果將不會以個人的資料呈現，而是以全國或依性別、年齡分層、學校公私立別、學校地理區域別、學生戶籍縣市、學生學制，以及教育部因政策需求而需進行分析之健康檢查及生活型態項目之方式呈現。資訊流通仍具有風險；如本政策聲明所示，本計畫對於當事人資料已盡安全維護義務，在此敘明。

五、當事人得行使之權利及方式：

- (一)本項係依《個人資料保護法》第8條第2項第2款之規定，係公務機關執行法定職務或非公務機關履行法定義務所必要，得免告知。
- (二)依《個人資料保護法》第3條之規定，當事人於就其個人資料可行使之權利包括查詢或請求閱覽、請求製給複製本、請求補充或更正、請求停止蒐集、處理或利用，以及請求刪除。學生若不同意本計畫之蒐集、處理、利用，或要求停止利用其個人資料，得依據《個人資料保護法》行使相關權利。

六、公告聲明：本校依據教育部建議與《個人資料保護法》第6條第1項第1、2、4款與第2項、第8條、第9條第2項第4款，就上述之目的外利用，參照《個人資料保護法》第5條誠信原則及比例原則之旨趣，將上述相關資料公告於本校健康中心網站。

Personal Data Protection Policy Statement

Academic Year 2025-2026 Personal Data Protection Policy Statement of the University

[Online Announcement Version]

Pursuant to the Ministry of Education (MOE) “2026-2027 Maintenance and Health Data Analysis Project for the College and University Student Health Information System”

For Academic Year 2025-2026, the University provides the MOE and the project implementing entity, the Department of Health Promotion and Health Education at National Taiwan Normal University (NTNU), with encrypted student-level data concerning health examinations, lifestyles, and self-assessments of health. The data are encrypted so that individuals cannot be identified. NTNU analyzes the data through the College and University Student Health Information System that it has established. In addition to safeguarding the security and quality of the University's student health examination data, this work enhances the effectiveness of school health services. The MOE's project aims to establish a nationwide system for monitoring the health status and health behaviors of college and university students, conduct data analysis, and develop mechanisms that enable students to manage their own health. The results serve as a basis for school health management, health promotion, and government policy analysis and formulation.

I. Legal Basis

- (1) Under Article 8 of the School Health Act, schools shall establish a student health management system and conduct student health examinations on a regular basis. When necessary, schools may conduct temporary health examinations or examinations for specific diseases for students, faculty, and staff.
- (2) Under Article 8, Paragraph 1 of the Regulations Governing Student Health Examinations, schools shall record, archive, and compile statistics on the results of student health examinations and follow-up treatment in the prescribed format.
- (3) The University and the MOE carry out the collection, processing, and use of personal data, and fulfill the relevant notification obligations, in accordance with Articles 6, 8, 9, 15, 16, 19, and 20 of the Personal Data Protection Act (the “PDPA”).

II. Collection, Processing, and Use of Personal Data Within and Beyond the Specific Purposes

- (1) Pursuant to Article 8 of the School Health Act and Articles 6, 8, 9, 15, and 19 of the PDPA, the University participates in the aforementioned MOE project and collects and uses relevant data within the specific purposes:
 1. Ordinary personal data: handled in accordance with Article 8 of the School Health Act and the specified-purpose provisions of Article 15 or Article 19 of the PDPA.
 2. Sensitive personal data: the collection, processing, and use of such data, and the relevant notification, are handled in accordance with Articles 6, 8, and 9 of the PDPA.
- (2) For the needs of school health, statistics, or academic research, and in accordance with the intent of the School Health Act and Article 6, Paragraph 1, Subparagraphs 1, 2, 4, and 5, and Article 9, Paragraph 2, Subparagraph 4 of the PDPA, the MOE collects the data and uses them beyond the specific purposes as follows:
 1. Ordinary personal data: use beyond the specific purposes is handled in accordance with Article 16 or Article 20 of the PDPA.
 2. Sensitive personal data: the collection, processing, and use of such data, and the relevant notification, are handled in accordance with Articles 6, 8, and 9 of the PDPA.

III. Categories of Health Examination Data

- (1) In accordance with Article 6, Paragraph 1, Subparagraphs 1 and 2, and Paragraph 2; Article 8, Paragraph 1 of the PDPA; and Article 10, Subparagraph 1 of the Enforcement Rules of the PDPA concerning statutory duties, the University collects, processes, and uses the aforementioned students' personal health data. Such data include, but are not limited to, data collected, processed, and used for the following specific purposes listed in the “Specific Purposes and the Classification of Personal Information” (effective October 1, 2012): 012 Public health or communicable disease control; 064 Health care services; 072 Government policy advocacy; 073 Government information disclosure, archives management and use; 109 Education or training administration; 156 Health administration; 157 Surveys, statistics, and research analysis; and 159 Academic research. Relevant categories of personal information include C001 Identifying individuals; C011 Personal descriptions; C012 Physical descriptions; C013 Habits; C014 Personality; and, under health and other categories, C111 Health records, among others.

Personal Data Protection Policy Statement

Academic Year 2025-2026 Personal Data Protection Policy Statement of the University

[Online Announcement Version]

Pursuant to the MOE “2026-2027 Maintenance and Health Data Analysis Project for the College and University Student Health Information System”

III. Categories of Health Examination Data (continued)

- (2) Details of the data to be provided by the University are set out in the attachment. For students’ basic information, only the following fields will be provided to the MOE: school code, type of academic program, year of birth, month of birth, blood type, sex, and city/county of household registration. The MOE handles the aforementioned de-identified sensitive personal data in accordance with Article 6, Paragraph 1, Subparagraphs 2, 4, and 5 of the PDPA, and ordinary personal data in accordance with Articles 16 and 20 of the same Act.

IV. Period, Area, Recipients, and Methods of Use of Health Examination Data

- (1) To comply with Articles 18 and 27 of the PDPA and Article 12 of its Enforcement Rules, the University follows the MOE’s recommendations and standard operating procedures to encrypt student-level data. The encrypted data are uploaded to the MOE’s College and University Student Health Information System and are provided solely to the MOE and NTNU’s Department of Health Promotion and Health Education for data analysis. Subsequent statistical analyses will not present information in personally identifiable form.
- (2) During the term of the MOE project, all collection, processing, and use of the data are limited to the territory of the Republic of China (Taiwan), and access is restricted to personnel acting within their official authority and duly authorized personnel.
- (3) The MOE will use the aforementioned data for policy analysis. Results will not be presented as individual-level data; instead, they will be presented nationwide or stratified by sex, age group, public/private school status, school geographic region, students’ city/county of household registration, type of academic program, and health examination or lifestyle items that the MOE must analyze for policy needs. The circulation of information inherently involves risks. As stated in this Policy Statement, the Project has fulfilled its obligations to safeguard the data subjects’ information.

V. Rights Exercisable by Data Subjects and Methods of Exercise

- (1) Pursuant to Article 8, Paragraph 2, Subparagraph 2 of the PDPA, notification may be waived where necessary for a government agency to perform its statutory duties or for a non-government agency to fulfill its statutory obligations.
- (2) Under Article 3 of the PDPA, a data subject may exercise the following rights with respect to their personal data: make an inquiry or request a review; request a copy; request supplementation or correction; request discontinuance of collection, processing, or use; and request erasure. Students who do not consent to the collection, processing, or use under this Project, or who request discontinuance of the use of their personal data, may exercise the relevant rights in accordance with the PDPA.

VI. Public Announcement

In accordance with the MOE’s recommendations and Article 6, Paragraph 1, Subparagraphs 1, 2, and 4 and Paragraph 2; Article 8; and Article 9, Paragraph 2, Subparagraph 4 of the PDPA, and with reference to the principles of good faith and proportionality under Article 5 of the PDPA for the aforementioned use beyond the specific purposes, the University announces the above information on the University Health Center website.