Summary of the FY2024 Annual Report

June, 2025
Personal Information Protection Commission (PPC)

I. Act on the Protection of Personal Information, etc.

The Triennial Review of the APPI

- In June 2024, the PPC published the "Interim Report of the Triennial Review of the Act on the Protection of Personal Information" which outlined the PPC's views on the Triennial Review as of that time.
- The PPC held "Working Group on the Triennial Review of the Act on the Protection of Personal Information" to discuss administrative monetary penalties, collective redress mechanisms and compensatory relief in particular. In December 2024, the PPC compiled a report that summarized the Working Group's discussion.
- In line with the above, to deepen the discussions on the fundamental nature of personal information protection policy, the PPC held hearings with experts, economic organizations, and consumer organizations, etc. to reconfirm key issues related to the fundamental framework of the personal information protection system among a wide range of stakeholders.
- In January 2025, the PPC published the "Approach for future consideration on the 'Triennial Review of the Act on the Protection of Personal Information" that reorganized the institutional issues to be discussed from the perspective of the APPI's fundamental framework as a general law.
- In March 2025, the PPC published the "Approach to Institutional Issues Related to the Act on the Protection of Personal Information" presenting its views on the overall institutional issues and indicating expected directions for specific regulatory measures.

Consolidation of Personal Information Protection System

To ensure smooth and appropriate implementation and application of the 2021 Amendment of the APPI, the PPC provided advice, etc. in response to inquiries from local governments, etc., and held practical training sessions, etc. to enhance understanding of the APPI among local government officials.

Utilization of Personal Information, etc. Based on the APPI, etc.

- The PPC Business Support Desk, which has been in place since FY2020, provided consultations (20 cases) to businesses across a wide range of industries on the handling of personal data and the use of anonymized personal information, etc. in their new business models.
- The PPC participated in "Study Group on Data Utilization Systems" set up to discuss the ideal form of data utilization systems, led by the Secretariat of the Meeting for Digital Administrative and Fiscal Reform at the Cabinet Secretariat. The PPC contributed to discussions on the challenges of promoting data utilization, including topics for amending the APPI such as the individuals' involvement and governance of businesses, etc. in the handling of personal information.

- I. Administrations on the Act on the Protection of Personal Information, etc.
- Supervision, etc. Based on the APPI
 - Status of Monitoring or Supervision Regarding the Handling of Personal Information
 - Supervision of Businesses Handling Personal Information, etc.

* Figures in [] indicate number of cases for FY2023. 14,198 cases 67 cases 395 cases 1 case [7.075 cases] [73 cases] [333 cases] [3 cases] Processing of reports Collection of Guidance and concerning cases of Recommendations advice leakage, etc. (*)

- This includes 2,745 reports on leakage, etc. related to an incident in which the server of MKSystem Corporation, which operates a social insurance and HR/labor management support system, was subject to unauthorized access and ransomware, which resulted in the encryption of personal data managed on the company's system and the occurrence of potential data leakage, etc.
- Monitoring of Administrative Entities

* Figures in [] indicate number of cases for FY2023.

1.951 cases [1,159 cases] Processing of reports concerning cases of leakage, etc. Administrative entities of the nation 221 cases [162 cases] Local Governments, etc. 1,730 cases [997 cases]

159 cases [70 cases] Request for the submission of materials Administrative entities of the nation 13 cases [18 cases] Local Governments, etc. 146 cases [52 cases]

56 cases [65 cases] Firsthand inspections, etc. Administrative entities of the nation 12 cases [18 cases] Local Governments, etc. 44 cases [47 cases]

172 cases [132 cases] Guidance and advice Administrative entities of the nation 28 cases [28 cases] Local Governments, etc 144 cases [104 cases]

An employee dispatched by NTT Business Solutions Co., Ltd., who was entrusted by NTT Marketing Act ProCX Co., Ltd. to handle personal data, etc., illicitly removed personal data, etc. of customers and private businesses, which are entrusters of NTT Marketing Act ProCX Co., Ltd. For this case, the PPC conducted on-site inspections on two list providers (Chuo Business Service Co., Ltd., and Next Stage LLC), which had obtained the illicitly removed personal data from the dispatched employee and provided it to third parties. Based on the investigation results, the PPC provided guidance and took other measures for proper acquisition of personal information (Article 20, Paragraph 1 of the Act on the Protection of Personal Information) and violation of confirmation obligations, etc. when receiving personal information from third parties (Article 30, Paragraph 1, Item 2 of the APPI). In addition, regarding Chuo Business Service Co., Ltd., as it was confirmed that they submitted false reports in response to the report request conducted by the PPC in July 2023 under the APPI, the PPC filed a criminal complaint.

- Starting in FY2024, the PPC began publishing quarterly summaries of the "Status of the Exercise of Monitoring and Supervision Authority" and the "Status of Handling of Reports on Leakage, etc." to provide more detailed information to the general public on the PPC's monitoring and supervision activities and to contribute to the proper handling of personal information by businesses and administrative entities.
- To further enhance collaboration with data-related ministries and agencies, to examine and understand possible measures that can be taken as various measures for managing the security required under the Act on the Protection of Personal Information, and to consider the ideal approach to effective awareness-raising for businesses handling personal information and administrative entities, the PPC decided to newly hold the "Cybersecurity Liaison Meeting on the Act on the Protection of Personal Information" on a quarterly basis starting in December 2024.

II. Administrations Related to the MY NUMBER Act

> Supervision, etc. Based on the MY NUMBER Act

- The PPC provided guidance to Act Japan Co., Ltd., Urban System Co., Ltd., and the City of Kumagaya in relation to a case where Act Japan Co., Ltd., which had been entrusted by the City of Kumagaya, Saitama Prefecture, with duties that are part of the individual number (MY NUMBER) related administrative operations, subcontracted the work to its affiliated company, Urban System Co., Ltd., without obtaining the approval of the City of Kumagaya.
- Starting in FY2024, the PPC began publishing quarterly summaries of the "Status of the Exercise of Monitoring and Supervision Authority" and the "Status of Handling of Reports on Leakage, etc." to provide more detailed information to the general public regarding the PPC's monitoring and supervision activities and to contribute to the proper handling of Specific Personal Information by businesses and administrative entities.
- > Status of monitoring or supervision regarding the handling of Specific Personal Information

* Figures in [] indicate number of cases for FY2023.

2,052 cases [334 cases]

Processing of reports concerning cases of leakage, etc. (*) 74 cases [76 cases]

Guidance and advice

44 cases [53 cases]

Collection of reports

46 cases

On-site inspections

* This includes 1,726 reports on leakage, etc. related to an incident in which the server of MKSystem Corporation, which operates a social insurance and HR/labor management support system, was subject to unauthorized access and ransomware, resulting in the encryption of personal data managed on the company's system and the occurrence of potential data leakage, etc.

> Specific Personal Information Protection Assessment

- The PPC received Full Assessment Reports from the heads of administrative entities, who serve as implementing entities of the assessment, and conducted reviews and approvals.
- In relation to the partial revision of the Specific Personal Information Protection Assessment Guidelines (Personal Information Protection Commission Notification No. 1 of 2024), which includes changes to the format of the Basic Assessment Reports and is expected to have a significant impact on assessment implementing entities, the PPC held a nationwide online briefing session for relevant personnel to ensure smooth implementation. In addition, upon request from prefectural governments, the PPC conducted separate briefing sessions for local government employees in 27 prefectures.

* Figures in [] indicate number of cases for FY2023.

9 cases

[10 cases]
Approval status of Specific
Personal Information
Protection Assessment
Reports

Receipt of Notifications Based on the Commission Rules for Article 19, Item 9 of the MY NUMBER Act

- The PPC accepted notifications concerning information linkages for processes specified by Prefectural/Municipal Ordinance using MY NUMBER, and as of October 2025, the estimated number of such notifications subject to information linkages is as shown on the right.
- The PPC carried out awareness-raising activities regarding the system to further promote the use of information linkages for processes specified by Prefectural/Municipal Ordinance using MY NUMBER.

* Figures in [] indicate number of cases for FY2023.

III. International Cooperation

Developing an International Environment for the Safe and Smooth Cross-Border Transfer of Personal Information

- The PPC issued a joint press statement announcing that PPC Japan and the European Commission agreed to accelerate the work with a view of concluding their talks as soon as possible in the ongoing discussions regarding the expansion of the scope of the EU's adequacy decision for Japan. In addition, the PPC started discussions with the United Kingdom of Great Britain and Northern Ireland (UK) in August 2024 regarding the expansion of the scope of the adequacy decision for Japan.
- As part of our outreach activities aimed at expanding participation in the Cross Border Privacy Rules (CBPR) system to new
 countries or regions, the PPC held the Global CBPR Forum Workshop in Tokyo in May 2024 in collaboration with other relevant
 organizations.
- Aiming introduce global model contractual clauses, the PPC held discussions with the authorities in Singapore who played a central role in drafting the ASEAN model contractual clauses.
- The PPC participated in a meeting held in September 2024 regarding the "Declaration on Government Access to Personal Data Held by Private Sector Entities" and engaged in discussions with member countries.
- Regarding DFFT, the PPC engaged in discussions with relevant agencies from various countries through forums, such as the Global Privacy Assembly (GPA), to strengthen relations. In addition, at the 62nd Asia Pacific Privacy Authorities (APPA) Forum main session and side events, which the PPC hosted in November 2024, Commissioners and Commissioners for International Cooperation participated in a panel discussion on DFFT, where they spoke about its initiatives.

> Strengthening and Building International Cooperative Relationships with Like-Minded Countries and Regions, including Enforcement Cooperation

- At the "Enforcement Cooperate Working Group" within the G7 Data Protection and Privacy Authorities Roundtable, the PPC co-chaired the group alongside the United States Federal Trade Commission and drafted a document to promote enforcement cooperation. The document was adopted as the outcome report of the working group at the 4th G7 DPA Roundtable.
- The PPC worked towards strengthen and build cooperative relationships with countries in the Asia-Pacific region, such as Sri Lanka, Thailand, and Timor-Leste, by sharing knowledge on the development of personal information protection legislation and providing other relevant information.

<u>117 cases</u>

Participation in major international fora

56 cases

Track record of dialogues with foreign institutions

Grasping International Trends and Disseminating Information

O To contribute to the international activities of domestic business, the PPC provided information on overseas legal frameworks and trends related to personal information protection on the PPC's website.

IV Affairs common to the APPI, the MY NUMBER Act, etc.

Response to Inquiries and Complaints

- The Inquiry Line for the APPI received many inquiries and complaints regarding the third-party provision of personal data from the private sector, and the restrictions on the use and provision of "personal information the administrative entity holds" held by local governments, etc. from the public sector. The Complaint Mediation Line for MY NUMBER received many inquiries and complaints regarding the measures for managing the security of Specific Personal Information. The PPC provided mediation to solve problems regarding the handling of personal information, etc. and Specific Personal Information as necessary.
- In order to provide more detailed information to the general public, promote the proper handling of personal information by businesses and administrative entities etc., and help solve problems between the parties involved, the PPC have published a report on the details of inquires and complaints received by the Inquiry Line for the APPI and the Complaint Mediation Line for MY NUMBER.
- Number of Inquiries and Complaints received * Figures in [] indicate number of cases for FY2023.

20,868 cases [22,103 cases]

Number of cases received at the Inquiry Line for the APPI (Private sector) 3,432 cases [2,410 cases]

Number of cases received at the Inquiry Line for the APPI (Public sector)

26 cases [28 cases]

Number of mediation requests received regarding the handling of personal information

1,494 cases [1,539 cases]

Number of cases received at the Complaint Mediation Line for MY NUMBER

15 cases [11 cases]

Number of mediation requests received regarding the handling of Specific Personal Information

Publicity and Awareness-Raising

- To raise awareness of the personal information protection system among businesses, etc., the PPC sent instructors to seminars and other events.
- As part of awareness-raising efforts for children, the PPC conducted outreach classes (with approximately 5,100 participants) using videos and other materials to convey the importance of personal information protection.
- The PPC distributed pamphlets summarizing the basic contents of the APPI for small and mediumsized businesses as well as posters outlining situations in which it is necessary to report leakage, etc. of personal data to SME-related organizations and others.
- The PPC launched the official YouTube channel of the PPC, enhancing information dissemination to foster understanding of the personal information protection system. This includes posting introductory videos regarding the personal information protection system for various stakeholders as well as fun educational videos to help people learn about personal information protection.

* Figures in [] indicate number of cases for FY2023.

141 times

(Approximately 22,400 participants) [132 times (Approximately 15,300 participants)]

Status of holding seminars regarding the Act on the Protection of Personal Information

Annex

Cases Subject to Disclosure under the Supervision of Businesses Handling Personal Information, etc., Based on the APPI

- A case in which personal information of customers of TEPCO Power Grid, Inc., a general transmission and distribution business operator, and TEPCO Energy Partner, Inc., a related retail electricity supplier, was accessed and used by their group companies, Tokyo Electric Power Company Holdings, Inc., and TEPCO Renewable Power, Inc.
- A case of incorrect issuance of a copy of the resident registration certificate in the convenience store issuance service in Takamatsu City, Kagawa Prefecture.
- A case in which ISETO Co., entrusted with the handling of personal data and personal information the administrative entity holds by businesses handling personal information and local governments in connection with the printing and mailing of notifications, had its server illegally accessed by a third party, resulting in the encryption of electronic files containing personal data by ransomware, leading to a leakage and damage to the personal data.
- A case in which Beavers Inc., a company engaged in job placement and career transition support, etc. in the construction industry, obtained personal information, etc. of an employee of a construction company, etc. by accessing publicly available information, such as legally required signage displayed at construction sites and public construction bidding and contract award information search websites, and then used this information to call the construction company, impersonate a fictitious business name, and convey false information to obtain personal information including the phone numbers of site supervisor, etc., from the phone respondents.