

**Specific Personal Information Protection  
Assessment Guidelines  
(Tentative Translation)**

**April 20, 2014**

**Specific Personal Information Protection Commission**

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- Form 1 Specific Personal Information Protection Assessment Plan and Management Report
- Form 2 Specific Personal Information Protection Assessment Plan Report (Basic Assessment Report)
- Form 3 Specific Personal Information Protection Assessment Plan Report (Focused Assessment Report)
- Form 4 Specific Personal Information Protection Assessment Plan Report (Full Assessment Report)

These Guidelines are based upon the provision of the Article 26 paragraph (1) of the Act on the Use of Numbers to Identify a Specific Individual in the Administrative procedure (Act No. 27 of 2013, hereinafter referred to as the "Number Use Act".), and specifies measures to be taken for a head of Administrative Organs, etc. to evaluate herself the danger and impact of the occurrence of a situation, such as the divulgence of Specific Personal Information, in accordance with Article 27 of the Number Use Act (hereinafter referred to as "Specific Personal Information Protection Assessment Reports"), to prevent the occurrence of these situations, and to manage Specific Personal Information properly.

## Article 1 Significance of Specific Personal Information Protection Assessment

### 1 Basic Principles of Specific Personal Information Protection Assessment

The Social Security and Tax Number System (hereinafter referred to as the "Number System") aims to improve the efficiency of administration of the social security, taxation, disaster management and other fields, and is introduced as social infrastructure for realizing a society which is fair, impartial and convenient for citizens. However, with the introduction of the Number System, concerns have been raised from the viewpoint of protecting the privacy and other rights and interests, such as concerns for uniform control of personal information by the government; tracking and matching of specific personal information; and harm to assets, etc. From the viewpoint of ensuring proper handling of personal information, laws and regulations on the protection of personal information have been implemented, such as the Act on the Protection of Personal Information Held by Administrative Organs et. (Act No. 58 of 2003, hereinafter referred to as the "Administrative Organs Personal Information Protection Act"), however, in addition, with regard to the above concerns, in the Number System specifies institutional protective measures, including monitoring and supervising by the Specific Personal Information Protection Commission (hereinafter referred to as the "Commission") as well as adopting safety measures for information systems such as generally requiring to use the Cooperation Network Systems for Personal Information when providing Specific Personal Information.

Specific Personal Information Protection Assessment is one of protective measures under the Number System framework, for which the basic principles are to protect the privacy and other rights and interests of individuals, and to proactively prevent against the occurrence of a situation, such as the divulgence of Specific Personal Information by ensuring the proper handling of Specific Personal Information Files. The implementation of Specific Personal Information Protection

Assessments is expected to lead to better protection of individual privacy and other rights and interests through the implementation of more proactive measures by the Assessment Implementing Organizations in accordance with the purport of personal information protection laws and ordinances.

## 2 Purposes of Specific Personal Information Protection Assessment

Specific Personal Information Protection Assessment is implemented for the following purposes.

### (1) Proactive Prevention of Infringement of Individual Privacy and Other Rights and Interests Through Preventive Measures

If individual privacy and other rights and interests are infringed as a result of information leakage, loss, damage or unauthorized use, the difficulty in completely deleting or revising the pertinent information and other factors makes recovery from such incidents difficult. As such, for the purpose of protection of individual privacy and other rights and interests, it is necessary to implement not ex-post measures after the occurrence of an incident, but rather to proactively analyze the risks of occurrence of divulgence of Specific Personal Information and other incidents in the handling of Specific Personal Information Files, and to implement measures to reduce such risks. Specific Personal Information Protection Assessment is a mean of responding to requests for this type of proactive measures, and the aim of the assessments is to proactively protect against infringement of individual privacy and other rights and interests.

Implementing proactive measures is also expected to prevent large-scale system changes and unnecessary expenditures after incidents.

### (2) Ensuring the Confidence of Citizens and Residents

From the viewpoint of allaying concerns regarding infringement of individual privacy and other rights and interests which were raised in response to the introduction of the Number System, it is required that a person handling Specific Personal Information Files provides easy-to-understand explanations of the types, purpose and methods of utilization, safety control measures and other aspects of the Specific Personal Information to be collected to citizens and residents and strives to improve the transparency of handling of the Specific Personal Information Files. Specific Personal Information Protection Assessments are aimed at ensuring the confidence of citizens and residents by having the Assessment Implementing Organizations self-declare that they are taking initiatives to protect individual privacy and other rights and interests and providing detailed explanations of what type of measures are being implemented

in the handling of Specific Personal Information Files.

### 3 Content of Specific Personal Information Protection Assessment

Specific Personal Information Protection Assessment is self-assessment of the handling of Specific Personal Information Files by Assessment Implementing Organization in affairs handling of these files. When Assessment Implementing Organizations intend to keep or keep Specific Personal Information Files, the organization shall estimate any potential effects on individual privacy and other rights and interests in the handling of said Specific Personal Information Files, carry out analysis of the risks of occurrence of divulgence of Specific Personal Information and other incidents, verify that appropriate measures are implemented to reduce any such risks, and self-declare this information on Basic Assessment Report, Focused Assessment Report or Full Assessment Report (hereinafter collectively referred to as "Specific Personal Information Protection Assessment Report").

Specific Personal Information Protection Assessments are the equivalent of the Privacy Impact Assessments (PIA) conducted in other countries, and are not simply a check of whether the necessary minimum measures for protecting individual privacy and other rights and interests are implemented or not, but it is also expected that the Assessment Implementing Organization shall actively and systematically examine and assess the organization's own initiatives.

In addition, it is expected that Assessment Implementing Organizations will continually implement measures to reduce the risk of Specific Personal Information divulgence and other incidents by responding to technological developments, social changes and other matters related to personal information and privacy protection.

## Article 2 Definitions

The terms used in these Guidelines in addition to the terms used in accordance with the Number Use Act and the Rule on Specific Personal Information Protection Assessments (Specific Personal Information Protection Commission Rule No. 1 of 2014, hereinafter referred to as the "Rule") and their definitions are as follows.

### 1 Assessment Implementing Organization

Refers to heads of Administrative Organs, etc. (heads of Administrative Organs, local government agencies, Incorporated Administrative Agencies, etc., local incorporated administrative agencies, the Japan Agency for Local Authority Information Systems, and Persons Referring Information and Persons Providing

Information stipulated in Article 19 item (vii) of the Number Use Act) stipulated in Article 2 paragraph (14) of the Number Use Act which carry out Specific Personal Information Protection Assessments in accordance with Article 27 of the Number Use Act and with the Rule.

## 2 Administrative Organ, etc.

Refers to heads of Administrative Organ, Incorporated Administrative Agencies, etc., the Japan Agency for Local Authority Information Systems, and Persons Referring Information and Persons Providing Information stipulated in Article 19 item (vii) of the Number Use Act (excluding local governments, etc. stipulated in Article 2 item (iii) of the Rule (hereinafter referred to as simply "local governments, etc.)) from among the Assessment Implementing Organizations.

## 3 Specific Personal Information Protection Assessment Plan and Management Report

Refers to written or electromagnetic records which state or record plans for Specific Personal Information Protection Assessments, implementation status and other factors related to the Specific Personal Information Files held by Assessment Implementing Organizations, which are and stipulated in Article 3 of the Rule.

## 4 Full Assessment Reports

Refers to written or records which state or record the results of assessments of items stipulated in Article 27 paragraph (1) of the Number Use Act (items subject to publication in accordance with Article 27 paragraph (4) of the Number Use Act and Article 8 of the Rule for Administrative Organs, etc., and Article 7 paragraph (6) of the Rule for local governments, etc.).

## 5 Information Sharing

Refers to request and provision of Specific Personal Information used in Cooperation Network System for Personal Information among heads of Administrative Organs, etc.

## 6 Serious Incident

Refers to incidents which result in the leakage, loss or damage of personal information, for which Assessment Implementing Organization bear responsibility for implementation of safety control measures in accordance with relevant laws and regulations, and which is intentional or for which the number of individuals concerned (specific individuals identified by the relevant personal information, excluding employees of the relevant Assessment Implementing Organization) affected is 101 or greater (excluding cases which are not directly attributable to the relevant Assessment Implementing Organization in delivery incidents).

## 7 Obtain of Specific Personal Information



Refers to Specific Personal Information to be recorded in Specific Personal Information Files and to be used in affairs subject to Specific Personal Information Protection Assessments.

8 Use of Specific Personal Information

Refers to use of Specific Personal Information recorded in Specific Personal Information Files in affairs subject to Specific Personal Information Protection Assessments.

9 Transfer of Specific Personal Information

Refers to provision of Specific Personal Information recorded in Specific Personal Information Files to parties engaged in affairs other than affairs subject to Specific Personal Information Protection Assessments.

10 System Files

Refers to Specific Personal Information Files handled on computers, and which are held by electronic data processing systems which are provided for operation through requirement definition, basic design, detailed design, programming and testing stages.

11 Other Electronic Files

Refers to Specific Personal Information Files handled on computers other than System Files.

Article 3 Specific Personal Information Protection Assessment Implementers

1 Parties Obligated to Implement Specific Personal Information Protection Assessments

Among the following listed parties, parties which intend to keep or keep Specific Personal Information Files are obligated to implement Specific Personal Information Protection Assessments in accordance with these Guidelines.

- (1) Heads of Administrative Organs
- (2) Heads of local governments and local government agencies
- (3) Incorporated Administrative Agencies, etc.
- (4) Local Incorporated Administrative Agencies
- (5) The Japan Agency for Local Authority Information Systems
- (6) Operators who carry out information sharing (Refers to Persons Referring Information and Persons Providing Information designated in Article 19 paragraph (7) of the Number Use Act other than those listed in items (1) to (5) above. The same applies for Article 4 paragraph 4 item (1) f below.)

2 Specific Personal Information Protection Assessments in Cases with Multiple

Parties Obligated to Implement Assessments, etc.

When the parties listed in paragraph 1 above implement Specific Personal Information Protection Assessments and there are multiple entities within the party who intend to keep or keep Specific Personal Information Files, the parties which grasps the conditions of the handling of the Specific Personal Information Files and risk countermeasures and shall bears responsibility for the noted items shall implement Specific Personal Information Protection Assessment.

In addition, in the event any parties other than the parties who intend to keep or keep the Specific Personal Information Files are involved with the Specific Personal Information Files, said parties shall cooperate with the appropriate implementation of Specific Personal Information Protection Assessment.

#### Article 4 Subjects of Specific Personal Information Protection Assessments

##### 1 Basic Principles

Specific Personal Information Protection Assessments apply to affairs handling Specific Personal Information Files under the Number Use Act, national laws or regulations other than the Number Use Act, or the provisions of ordinances enacted by local governments in accordance with the provisions of the Article 9 paragraph (2) of the Number Use Act.

##### 2 Specific Personal Information Protection Assessment Units

In principle, Specific Personal Information Protection Assessments shall be carried out for each statutory designated affair. Regarding the affairs set forth in Appendix Table 1 of the Number Use Act, in principle Specific Personal Information Protection Assessments shall be carried out for the affairs listed in each paragraph of Appendix Table 1. However, in circumstances where implementing the assessments for each item proves difficult, Specific Personal Information Protection Assessments can be applied separately to the affairs stipulated in 1 paragraph divided into multiple affairs, or together to the affairs stipulated in multiple paragraphs as a single affair. The units of affairs subject to Specific Personal Information Protection Assessments will be divided can also be determined by the Assessment Implementing Organizations, regarding the affairs prescribed by the provisions of the Number Use Act other than Appendix Table 1, by other national laws and regulations other than the Number Use Act, or by ordinances enacted by local governments.

### 3 Specific Personal Information Files

The Specific Personal Information Files handled in affairs subject to Specific Personal Information Protection Assessments refer to the Personal Information Files including the Individual Number (Number Use Act Article 2 paragraph (9)), and are assembly of information including personal information systemically arranged in such a way that Specific Personal Information can be retrieved.

Units for Specific Personal Information Files can be determined by the Assessment Implemented Organization based on the purposes of utilization of the Specific Personal Information Files. Multiple Specific Personal Information Files may be held for a single affair subject to Specific Personal Information Protection Assessments.

### 4 Affairs for which there is no Obligation to Implement Specific Personal Information Protection Assessments

#### (1) Affairs for which there is no Obligation to Implement

Of the affairs in which Specific Personal Information Files are handled, the following affairs (affairs which handle only Specific Personal Information Files stipulated in Article 4 items (i) through (vii) of the Rule) have no obligation to implement Specific Personal Information Protection Assessments. Even for the following affairs, assessments are not prohibited and the Specific Personal Information Protection Assessment framework can be used to implement assessments at the discretion of the relevant parties.

- a Affairs handling only Specific Personal Information Files which contains matters concerning personal matters, wages or welfare benefits or any equivalent matters of employees or former employees, etc. (Article 4 item (i) of the Rule)
- b Affairs handling only manually processed files (Article 4 item (ii) of the Rule)
- c Affairs for which the number of individuals concerned for whom information is recorded in the Specific Personal Information Files (hereinafter referred to as the "Applicable No. of Individuals") for all held Specific Personal Information Files totals less than 1,000 individuals (Article 4 item (iii) of the Rule)
- d Affairs in which the only Specific Personal Information Files handled are those which record items related the medical insurance of currently insured individuals, formerly insured individuals or the dependents of currently or formerly insured individuals held by a health insurance society

- independently established by the proprietor of a single business or a health insurance society established jointly or in association by the proprietors of 2 or more closely related businesses (Article 4 items (iv) and (v) of the Rule)
- e Affairs handling only Specific Personal Information Files which record items related to the mutual aid of public employees, former public employees, or dependents of public employees or former public employees (Article 4 item (v) of the Rule)
- f Affairs handling only Specific Personal Information Files by an operator engaged in information sharing which record Specific Personal Information not subject to the information sharing (Article 4 item (vi) of the Rule)
- g Affairs handling only Specific Personal Information Files held due to necessity for use in audits by the Board of Audit (Article 4 item (vii) of the Rule)

In addition, when multiple Specific Personal Information Files are handled in affairs subject to Specific Personal Information Protection Assessments, and a portion of those files are Specific Personal Information Files of the types stipulated above (excluding c), the items related to said Specific Personal Information Files can be excluded from the Specific Personal Information Protection Assessment Reports.

- (2) Application of the Prescriptions of the Number Use Act outside of Specific Personal Information Protection Assessments

Even for the affairs stipulated in item (1) above for which there is no obligation to implement the Specific Personal Information Protection Assessments, the other prescriptions of the Number Use Act are still applicable, and the parties carrying out the relevant affairs are required to implement the necessary measures in accordance with the Number Use Act.

## Article 5 Specific Personal Information Protection Assessment Implementation Procedures

- 1 Specific Personal Information Protection Assessment Plan and Management Report

- (1) Documentation of Specific Personal Information Protection Assessment Plan and Management Reports

Before implementing the first Specific Personal Information Protection Assessment, Assessment Implementing Organizations shall make a Specific Personal Information Protection Assessment Plan and Management Report (refer to Form 1).

Specific Personal Information Protection Assessment Plan and Management Reports are made to ensure the systematic implementation and appropriate management of the implementation status of Specific Personal Information Protection Assessments. The Reports shall contain all affairs and systems related to the Specific Personal Information Protection Assessments implemented by the Assessment Implementing Organization and shall be made for each Assessment Implementing Organization.

Specific Personal Information Protection Assessment Plan and Management Reports shall be updated immediately in the event there are any changes in the information recorded on the Specific Personal Information Protection Assessment Plan Management Reports.

(2) Submission of Specific Personal Information Protection Assessment Plan and Management Reports

When submitting the first Specific Personal Information Protection Assessment Report to the Commission, Assessment Implementing Organizations shall, in accordance with the provisions of Article 3 of the Rule, submit the Specific Personal Information Protection Assessment Plan Management Report together with the Specific Personal Information Protection Assessment Reports. Then, each time the Assessment Implementing Organization submits Specific Personal Information Protection Assessment Reports to the Committee, the Specific Personal Information Protection Assessment Plan and Management Report shall be updated and submitted together with the other Assessment Reports.

Publication is not necessary for the Specific Personal Information Protection Assessment Plan and Management Report.

2 Threshold Assessment

When Assessment Implementing Organizations implement Specific Personal Information Protection Assessments for affairs in which Specific Personal Information Files are handled, Assessment Implementing Organization shall determine the type of required Specific Personal Information Protection Assessment to be implemented as follows (hereinafter referred to as "Threshold Assessment") based on (1) the Applicable No. of Individuals, (2) the number of employees of the Assessment Implementing Organization and employees of the consigned organization if the handling of the Specific Personal Information Files is outsourced who handle the relevant Specific Personal Information Files (hereinafter referred to as "No. of Handlers"), and (3) the occurrence of any

Serious Incidents related to Specific Personal Information at the Assessment Implementing Organization as specified in Article 4 item (viii) j of the Rule (Including the finding of such Serious Incidents by the Assessment Implementing Organization. The same applies hereafter.).

Even if the Basic Assessment is deemed sufficient by the Threshold Assessment result, Focused Assessment or Full Assessment may be implemented and if the Focused Assessment is deemed necessary, Full Assessment may be implemented voluntarily.

- (1) Assessment Implementing Organizations shall implement Basic Assessment for cases where the Applicable No. of Individuals is 1,000 to less than 10,000 (Number Use Act Article 27 paragraph (1) and Rule Article 4 item (viii) b and Article 5)
- (2) Assessment Implementing Organizations may adopt Basic Assessment for cases where the Applicable No. of Individuals is 10,000 to less than 100,000, the No. of Handlers is less than 500, and there have been no Serious Incidents related to Specific Personal Information at the Assessment Implementing Organizations in the past 1 year (Number Use Act Article 27 paragraph (1) and Rule Article 4 item (viii) j and Article 5)
- (3) Assessment Implementing Organizations shall implement both Basic Assessment and Focused Assessment for cases where the Applicable No. of Individuals is 10,000 to less than 100,000 and there has been Serious Incident related to Specific Personal Information at the Assessment Implementing Organizations in the past 1 year (Number Use Act Article 27 paragraph (1) and Rule Article 4 item (ix), Article 5, Article 6 paragraph (1) item (i), item (iii))
- (4) Assessment Implementing Organizations shall implement both Basic Assessment and Focused Assessment for cases where the Applicable No. of Individuals is 10,000 to less than 100,000, and the number of handlers is 500 or more (Number Use Act Article 27 paragraph (1) and Rule Article 4 item (ix), Article 5, Article 6 paragraph (1) item (i), item (iii))
- (5) Assessment Implementing Organizations shall implement both Basic Assessment and Focused Assessment for cases where the Applicable No. of Individuals is 100,000 to less than 300,000, the number of handlers is less than 500 and there have been no Serious Incident related to Specific Personal Information at the Assessment Implementing Organizations in the past 1 year (Number Use Act Article 27 paragraph (1) and Rule Article 4 item (ix), Article 5, Article 6 paragraph (1) item (ii), item (iii))
- (6) Assessment Implementing Organizations shall implement both Basic

- Assessment and Full Assessment for cases where the Applicable No. of Individuals is 100,000 to less than 300,000 and there has been Serious Incident related to Specific Personal Information at the Assessment Implementing Organizations in the past 1 year (Number Use Act Article 27 and Rule Article 5 for Administrative Organs, etc., and Number Use Act Article 27 paragraph (1), Rule Article 4 item (x), Article 7 paragraph (1), and paragraphs (3) through (6) for local governments, etc.)
- (7) Assessment Implementing Organizations shall implement both Basic Assessment and Full Assessment for cases where the Applicable No. of Individuals is 100,000 to less than 300,000 and the number of handlers is 500 or more (Number Use Act Article 27 and Rule Article 5 for Administrative Organs, etc., and Number Use Act Article 27 paragraph (1), Rule Article 4 item (x), Article 7 paragraph (1), and paragraphs (3) through (6) for local governments, etc.)
- (8) Assessment Implementing Organizations shall implement both Basic Assessment and Full Assessment for cases where the Applicable No. of Individuals is 300,000 or more (Number Use Act Article 27 and Rule Article 5 for Administrative Organs, etc., and Number Use Act Article 27 paragraph (1), Rule Article 4 item (x), Article 7 paragraph (1), and paragraphs (3) through (6) for local governments, etc.)

### 3 Specific Personal Information Protection Assessment Report

The Assessment Implementing Organizations shall implement Specific Personal Information Protection Assessments in accordance with the results of Threshold Assessments, and make Specific Personal Information Protection Assessment Reports and submit the Reports to the Commission as indicated below. When doing so, if any supplementary materials have been made to explain the items noted on the Specific Personal Information Protection Assessment Reports, said supplementary materials may be attached to the Specific Personal Information Protection Assessment Reports.

#### (1) Basic Assessment Reports

In accordance with the provisions of Article 5 item 1 of the ordinance, the Assessment Implementing Organizations shall make Basic Assessment Report (refer to Form 2) for all affairs for which Specific Personal Information Protection Assessments implementation is required, and submit said Reports to the Commission. The results of the Threshold Assessment from 2 above shall be noted on the Basic Assessment Reports.

(2) Focused Assessment Reports

In accordance with the provisions of Article 6 item 1 of the Rule, the Assessment Implementing Organizations shall make Focused Assessment Reports (refer to Form 3) for the situations in paragraph 2 items (3), (4) and (5) above, and submit said Reports to the Commission.

(3) Full Assessment Reports

a For Administrative Organs, etc.

Administrative Organs, etc. shall make Full Assessment Reports (refer to Form 4) for the situations in paragraph 2 items (6), (7) and (8) above.

In addition, in accordance with the provisions of Article 27 item 1 of the Number Use Act, after creating Full Assessment Report, Administrative Organs, etc. shall publicly announced the Full Assessment Report and shall consult widely for citizens' opinions, and implement the necessary review of the Full Assessment Reports after sufficiently considering the obtained opinions. However, this requirement shall not apply for the Full Assessment Reports or the items (refer to item (4) below) for which publication is not required (Rule Article 10).

The period for which Full Assessment Report shall be publicly announced to consult citizens' opinions shall be 30 days or more. However, in the event of special circumstances, this period can be shortened after the reasons are being clearly stated on the Full Assessment Report.

In accordance with the provisions of Article 27 paragraph (2) of the Number Use Act, Administrative Organs, etc. shall submit the reviewed Full Assessment Reports to the Commission after publicly announced to citizens' opinions, and shall obtain the approval of the Commission.

b For Local Governments, etc.

Local governments, etc. make Full Assessment Reports for the situations in paragraph 2 items (6), (7) and (8) above.

In addition, in accordance with the provisions of Article 7 paragraph (1) of the Rule, after making Full Assessment Report, local governments, etc. shall publicly announce the Full Assessment Report and consult widely for opinions of residents, etc., and review as necessary for Full Assessment Report after sufficiently considering the obtained opinions. However, this requirement shall not apply for the Full Assessment Reports or the items (refer to item (4) below) for which publication is not required (Rule Article 7 paragraph (3)).

The period for which Full Assessment Reports shall be publicly announced



to consult opinions of residents, etc. shall be 30 days or more. However, in the event of special circumstances, this period can be shortened after the reasons are being clearly stated on the Full Assessment Report. In addition, in cases where local governments, etc. have established a system for consulting opinions of residents, etc. in accordance with ordinances, etc., the opinion consulting can be based on said system.

In accordance with the provisions of Article 7 paragraph (4) of the Rule, local governments, etc. shall obtain third party inspections of the Full Assessment Report after they have been publicly announced to consult citizens' opinions, and the necessary revisions has been made. In principle, the third party inspection shall be carried out by the Personal Information Protection Inquiry Council or the Personal Information Protection Review Board which is established by the local governments, etc. in accordance with its ordinances, etc., however in the event there are no specialists available who possess the specialist knowledge of personal information protection or information system at these organizations, or if there are other difficulties in having the inspections carried out by the Personal Information Protection or Personal Information Protection Review Board, the inspections can be carried out by other means. However, when using other methods, the inspection shall still be carried out by an external third party who possesses the specialist knowledge. When third party inspections are being carried out, inspectors shall be presented with Full Assessment Reports which include items that will not be publicized (refer to item (4) below) while being charged with maintaining the confidentiality of information. The viewpoints on examination in Article 10 paragraph 1 item (2) below can be referenced when carrying out third party inspections.

In accordance with the provisions of Article 7 paragraph (5) of the Rule, the local governments, etc. shall submit Full Assessment Reports that have undergone third party inspection to the Commission.

(4) Publication of Specific Personal Information Protection Assessment Reports

After submitting Basic Assessment Reports and Focused Assessment Reports to the Commission, and after receiving Commission approval on Full Assessment Reports, Administrative Organs, etc., shall immediately publicize the Reports (Number Use Act Article 27 paragraph (4) and Rule Article 5 paragraph (2), Article 6 paragraph (3) and Article 8).

After submitting Specific Personal Information Protection Assessment Reports to the Commission, local governments, etc. shall immediately publicize

the Reports (Rule Article 5 paragraph (2), Article 6 paragraph (3) and Article 7 paragraph (6)).

In principle, Specific Personal Information Protection Assessment Reports and attached materials shall all be publicized. However, in accordance with the provisions of Article 13 of the Rule, if it is acknowledged that publishing the relevant materials poses security risks, the Assessment Implementing Organization may decide not to the portions which pose a security risk, after submitting all of the Specific Personal Information Protection Assessment Reports and attached materials to the Commission, including the portions that will not be publicized. Even in such situations, the portions to not be publicized shall be restricted to portions which pose an actual security risk such as detailed methods which cover periods, detailed numbers of occurrences and technological details.

For Specific Personal Information Protection Assessments related to affairs in which Specific Personal Information Files are held for criminal investigations, investigation of tax crimes based on the provisions of laws related to tax, and institution or maintenance of prosecution, the Assessment Implementing Organization may retain from publicizing the portions of said Reports and materials, after submitting all of the Specific Personal Information Protection Assessment Reports and attached materials to the Commission, including the portions that will not be publicized, in accordance with Article 13 of the Rule.

#### 4 Review of Specific Personal Information Protection Assessments Reports

The Assessment Implementing Organization shall endeavor to compare the publicized Specific Personal Information Protection Assessment Reports to actual conditions at least once a year and review, and examine whether changes are necessary or not (Rule Article 14).

#### 5 Notice for Discontinuance of Affairs for which Specific Personal Information Protection Assessments Have Been Implemented

In the event the Assessment Implementing Organizations discontinue the affairs for which Specific Personal Information Protection Assessments have been implemented, they shall notify the Commission without delay in accordance with Article 16 of the Rule. The Assessment Implementing Organization shall keep publicizing the Reports within minimum of 3 years of the date the affairs are discontinued, after carry out necessary revisions to the Specific Personal Information Protection Assessment Reports, including the reasons for

discontinuing the implementation of the affairs.

## Article 6 Implementation Timing of Specific Personal Information Protection Assessment

### 1 For Newly Held Files

When seeking to keep newly Specific Personal Information File, the Heads of Administrative Organs, etc. shall, in principle, carry out Specific Personal Information Protection Assessment before keeping the Specific Personal Information File. However, in accordance with the provisions of Article 9 paragraph (2) of the Rule, in circumstances where the Specific Personal Information Files must be kept without implementing Specific Personal Information Protection Assessments, such as the response to disaster occurrence, etc., the Specific Personal Information Protection Assessments shall be implemented as early as possible after keeping the Specific Personal Information Files.

### (1) Implementation Timing when Intending to Keep System Files

#### a For normal conditions

In accordance with the provisions of Article 9 paragraph (1) of the Rule, implementation shall generally be carried out before the completion of system requirement definition; the Specific Personal Information Protection Assessments may be implemented at an appropriate period before the start of programming at the discretion of the Assessment Implementing Organization.

#### b For Specific Personal Information Protection Assessments which require approval by the Commission

In accordance with the provisions of Article 9 paragraph (1) of the Rule, implementation shall generally be carried out before the completion of system requirement definition; in the event it is difficult to implement the Specific Personal Information Protection Assessments before the completion of system requirement definition, a different implementation timing can be set based upon advance consultation with the Commission.

#### c Transitional measures

In the event programming for system development will be carried out within 6 months of the date of enforcement of these Guidelines, Specific Personal Information Protection Assessments may be implemented after programming starts, before keeping the Specific Personal Information Files.

### (2) Implementation Timing when Intending to Hold Other Electronic Files

Specific Personal Information Protection Assessments shall be carried out at

the affair conduct examination stage.

## 2 For Files Other than Newly Held Files

### (1) Basic Principles

For Specific Personal Information Files for which the Assessment Implementing Organization has implemented Specific Personal Information Protection Assessments, in situations items (2) and (3) below, Specific Personal Information Protection Assessments shall be implemented again, and for situation item (4) below, efforts shall be made to implement Specific Personal Information Protection Assessments again.

When implementing assessments again, any changes shall be noted in the "Changes" column of the Specific Personal Information Protection Assessment Reports designated by the Commission. The provisions of the preceding shall not preclude implementing Specific Personal Information Protection Assessments again as deemed appropriate for situations other than those in items (2) to items (4) below.

### (2) Important Changes

Important changes to Specific Personal Information Files (changes specified in the guidelines as which pose the danger and impact of the occurrence of a situation, such as divulgence of Specific Personal Information, prescribed in Article 11 of the Rule) refers to the changes to the items on Focused Assessment Reports or Full Assessment Reports specified in the Appendix Table of these Guidelines. However, revisions to typing or spelling mistakes, formal changes such as to organization names, addresses, law titles, etc., changes which clearly mitigate the risk of the occurrence of a situation that may pose the impact on individual privacy and other rights and interests, such as the divulgence of Specific Personal Information, shall not be classified as important changes.

As specified in the Appendix Table of these Guidelines, though the occurrence of Serious Incidents themselves are not immediately classified as important changes, it is assumed that the Assessment Implementing Organization will review risk countermeasures, etc. when a Serious Incidents related to Specific Personal Information occurs, and such would be classified as important changes.

When making important changes to held Specific Personal Information Files, the Assessment Implementing Organizations shall implement Specific Personal Information Protection Assessments again before making said changes.

However, in circumstances where handling of the Specific Personal Information Files must be changed without implementing Specific Personal Information Protection Assessments, such as the response to disaster occurrence, etc., the Specific Personal Information Protection Assessments shall be implemented as early as possible after changing the handling of the Specific Personal Information Files.

- a Implementation timing when important changes are not accompanied by system development  
Shall be in accordance with paragraph 1 item (1) above.
- b Implementation periods when not implementing together with system development or when seeking to hold Other Electronic Files  
Specific Personal Information Protection Assessments shall be carried out at the affair conduct change examination stage.

(3) Threshold Assessment Result Changes

During the review of the Specific Personal Information Protection Assessment Reports in Article 5 paragraph 4 above, if the Threshold Assessment results change due to an increase in the Applicable No. of Individuals or No. of Handlers, and Focused Assessment or Full Assessment is deemed to be newly implemented, the Assessment Implementing Organization shall immediately implement Specific Personal Information Protection Assessments again (Rule Article 6 paragraphs (2) and (3), Article 7 paragraphs (2) through (6), Article 8 and Article 14).

In addition, if the Threshold Assessment results change due to the occurrence of a Serious Incidents related to Specific Personal Information, and a Focused Assessment or Full Assessment is deemed to be newly implemented, the Assessment Implementing Organization shall implement Specific Personal Information Protection Assessment again immediately after the occurrence of the relevant Specific Personal Information related Serious Incidents (Rule Article 6 paragraphs (2) and (3), Article 7 paragraphs (2) through (6), Article 8 and Article 14).

(4) Expiration of Fixed Period

Before 5 years passes since the publication of the latest Specific Personal Information Protection Assessment Report, in accordance with the provisions of Article 15 of the Rule, the Assessment Implementing Organization shall endeavor to implement Specific Personal Information Protection Assessments again.

## Article 7 Revision of Specific Personal Information Protection Assessment Reports

### 1 Basic Assessment Reports

In the event of changes to the items recorded on the Basic Assessment Report which do not comply with the changes to the results of the Threshold Assessment in Article 6 paragraph 2 item (3) above, the Assessment Implementing Organization shall, in accordance with Article 14 of the Rule, immediately revise the Basic Assessment Reports, submit the Reports to the Commission, and publicize the revised Reports. When implemented the revisions, any changes shall be noted in the "Changes" column of the Specific Personal Information Protection Assessment Reports designated by the Commission.

### 2 Focused Assessment Reports/Full Assessment Reports

In the event of changes to the items recorded on the Focused Assessment Reports or Full Assessment Reports which are not categorized as important changes as prescribed in Article 6 paragraph 2 item (2) above, the Assessment Implementing Organization shall, in accordance with Article 14 of the Rule, immediately revise the Focused Assessment Reports or Full Assessment Reports, submit the Reports to the Commission, and publicize the revised Reports. When implementing the revisions, any changes shall be noted in the "Changes" column of the Specific Personal Information Protection Assessment Reports designated by the Commission.

These situation are not categorized as the implementation of Specific Personal Information Protection Assessment. Therefore, opinion consultation from citizens (residents, etc. for local governments, etc.) and approval by the Commission or third party inspection shall not be required. However, the provisions of the preceding shall not preclude the opinion consulting from citizens (residents, etc. for local governments, etc.) or implementation of third party inspections at the discretion of the Assessment Implementing Organization.

## Article 8 Prior Notice in Accordance with the Number Use Act and Administrative Organs Personal Information Protection Act

In accordance with provisions of Article 10 paragraph (1) of the Administrative Organs Personal Information Protection Act which have been replaced by application of the provisions of Article 29 paragraph (1) and Article 30 paragraphs (1) and (2) of the Number Use Act, when Administrative Organs intend to keep Specific Personal Information Files, the relevant Heads of the Administrative Organs must notify the Commission of the items stipulated in each item of the

same paragraph (hereinafter referred to as the "Prior Notification Items") and in addition, the notification must also be carried out when any changes are made to the Prior Notification Items. In the event Administrative Organs implement Specific Personal Information Protection Assessments and publicize Full Assessment Reports, or implement Specific Personal Information Protection Assessments again when making Important Changes to held Specific Personal Information Files and publicizing Full Assessment Reports with changed Prior Notification Items, notification shall be considered to have been carried out in either case in accordance with the provisions of Article 27 paragraph (5) of the Number Use Act.

When Administrative Organs submit or publish Focused Assessment Reports, it shall be handled as prior notice, etc. are carried out.

## Article 9 Assessment Items for Specific Personal Information Protection Assessments

### 1 Basic Principles

When implementing Specific Personal Information Protection Assessments, Assessment Implementing Organization shall clarify the characteristics of the affairs in which Specific Personal Information Files are handled, recognize or analyze the risks of the occurrence of a situation which may pose the impact on individual privacy and other rights and interests, such as the divulgence of Specific Personal Information, verify that appropriate measures are in place to reduce such risks, and declare this information on the Specific Personal Information Protection Assessment Reports.

### 2 Assessment Items

#### (1) Basic Assessment Reports

Items to be noted on Basic Assessment Reports stipulated in Article 2 item (i) of the Rule shall include an outline of the affairs subject to Specific Personal Information Protection Assessments, the names of information systems to be used in the relevant affairs, names of the relevant Specific Personal Information Files, the name of the division responsible for implementing the Specific Personal Information Protection Assessments for the relevant affairs, the statutory basis allowing for the use of Individual Numbers, etc. In addition, when carrying out Information Sharing in the relevant affairs, the statutory basis for such shall also be noted.

In addition, regarding affairs subject to Specific Personal Information Protection Assessments, the Assessment Implementing Organization shall

recognize the risks of the occurrence of a situation which may pose the impact on individual privacy and other rights and interests, such as the divulgence of Specific Personal Information, verify that appropriate measures are in place to reduce such risks, and declare this information.

(2) Focused Assessment Reports

The items to be noted on the Focused Assessment Reports stipulated in Article 2 item (ii) of the Rule shall be as follows.

a Basic Information

Items to be noted on shall include the details of the affairs subject to Specific Personal Information Protection Assessments, the functions of information systems to be used in the relevant affairs, names of the Specific Personal Information Files to be handled in the concerned affairs, the name of the division responsible for implementing the Specific Personal Information Protection Assessments for the relevant affairs, the statutory basis allowing for the use of Individual Numbers, etc. In addition, when carrying out Information Sharing in the relevant affairs, the statutory basis for such shall also be noted.

b Outline of Specific Personal Information Files

An outline of the Specific Personal Information Files to be handled in affairs subject to Specific Personal Information Protection Assessments such as Specific Personal Information File types, number and scope of applicable individuals, recorded items shall be recorded. In addition, the acquisition and usage methods of the Specific Personal Information, status of outsourcing of handling of Specific Personal Information Files and methods if there is any outsourcing, status of providing or transfer of Specific Personal Information and the methods if there is any providing or transfer, Specific Personal Information storage locations and outlines of any other processes in which Specific Personal Information Files will be handled shall also be noted.

c Risk Countermeasures

Major risks which could result in a situation which may pose the impact on individual privacy and other rights and interests, such as the divulgence of Specific Personal Information, where Specific Personal Information is handled shall be analyzed and the measures implemented to reduce such risks shall be noted. Though the form of the Focused Assessment Report indicates major risks only, it is recommended that other risks also be analyzed and measures to reduce such risks be noted.

In addition, self-inspection/audit, employee training and education and



other risk countermeasures shall also be noted.

Based on these risk countermeasures, the Assessment Implementing Organization shall verify that appropriate measures are in place to reduce risks and these shall be declared.

d Other

Information on requests for disclosure, correction and suspension of use and inquiries on Specific Personal Information File handling, etc. shall be noted.

(3) Full Assessment Reports

The items to be noted on the Full Assessment Reports stipulated in Article 27 paragraph (1) all items of the Number Use Act and Article 12 of the Rule shall be as follows.

a Basic Information

Items to be noted on shall include the full details of the affairs subject to Specific Personal Information Protection Assessments, the functions of information systems to be used in the relevant affairs, names of the Specific Personal Information Files to be handled in the concerned affairs, the name of the division responsible for implementing the Specific Personal Information Protection Assessments for the relevant affairs, the statutory basis allowing for the use of Individual Numbers, etc. In addition, when carrying out Information Sharing in the relevant affairs, the statutory basis for such shall also be noted.

b Outline of Specific Personal Information Files

An outline of the Specific Personal Information Files to be handled in affairs subject to Specific Personal Information Protection Assessments such as Specific Personal Information File types, number and scope of applicable individuals, recorded items shall be recorded. In addition, the acquisition and usage methods of the Specific Personal Information, status of outsourcing of handling of Specific Personal Information Files and methods if there is any outsourcing, status of providing or transfer of Specific Personal Information and the methods if there is any providing or transfer, Specific Personal Information storage and deletion methods and outlines of any other processes in which Specific Personal Information Files will be handled shall also be noted.

c Risk Countermeasures

Various risks which could result in a situation which may pose the impact on individual privacy and other rights and interests, such as the divulgence of

Specific Personal Information, where Specific Personal Information is handled shall be analyzed in detail and the measures implemented to reduce such risks shall be noted. It is recommended that risks not only indicated risks on Full Assessment Report, but also other risks be analyzed and measures to reduce such risks be noted.

In addition, self-inspection/audit, employee training and education and other risk countermeasures shall also be noted.

Based on these risk countermeasures, the Assessment Implementing Organization shall verify that appropriate measures are in place to reduce risks and these shall be declared.

d Assessment Implementation Procedures

Administrative Organs, etc. shall note the methods for collecting opinions from citizens implemented in Article 5 paragraph 3 item (3) a above as well as the major opinion details, etc., the date the Full Assessment Reports are submitted to the Commission for the approval of the Commission stipulated in Article 10-1 below, and reviews by the Commission.

Local governments, etc. shall note the opinion consulting from residents, etc. implemented in accordance with Article 5 paragraph 3 item (3) b above and the methods for third party inspections.

e Other

Information on requests for disclosure, correction and suspension of use and inquiries on Specific Personal Information File handling, etc. shall be noted.

## Article 10 Commission Involvement

### 1 Approval of Specific Personal Information Protection Assessment Reports

#### (1) Approval Applicability

The Commission shall carry out approval of the Full Assessment Reports submitted to the Commission by Administrative Organs, etc. in accordance with Article 5 paragraph 3 item (3) a above.

The Commission shall not carry out approval of Basic Assessment Reports, Focused Assessment Reports, Full Assessment Reports submitted by local governments, etc., or discretionarily submitted Full Assessment Reports.

#### (2) Review Viewpoints

When approving Full Assessment Reports, the Commission shall carry out reviews from the following two viewpoints: conformity and validity.

##### a Conformity

Examination of whether Specific Personal Information Protection Assessments are being implemented in a manner conforming to the methods stipulated in these Guidelines.

- Are there any errors in Threshold Assessment?
- Are appropriate Assessment Implement Organization carrying out the assessments?
- Is the scope of portions not to be publicized appropriately?
- Are assessments being carried out at appropriate timing?
- Are citizen opinions widely consulted using appropriate methods and are necessary revisions implemented with sufficient consideration for the obtained opinions?
- Are all of the items required on the Specific Personal Information Protection Assessment Reports examined and filled out in accordance with the actual status of the affairs subject to Specific Personal Information Protection Assessments? Etc.

b Validity

Are the details of the Specific Personal Information Protection Assessments valid according to the purposes, etc. of the Specific Personal Information Protection Assessments specified in these Guidelines?

- Is the division, which is noted to implement Specific Personal Information Protection Assessments, capable of supervising the affairs subject to the Specific Personal Information Protection Assessments and bearing responsibility for implementing measures to reduce risks?
- Is the content of the affairs subject to the Specific Personal Information Protection Assessments noted in detail? Is the flow of the Specific Personal Information in the relevant affairs also noted?
- Are the risks of the occurrence of a situation which may pose the impact on individual privacy and other rights and interests , such as the divulgence of Specific Personal Information , where Specific Personal Information Files are handled identified based on the actual status of the affairs subject to the Specific Personal Information Protection Assessments?
- Are the measures which must be enacted to reduce the identified risks noted in detail?
- Are the measures for reducing the noted risks valid according to the purposes of the Specific Personal Information Protection Assessments, including proactive prevention of infringements of individual privacy

and other rights and interests and securing the confidence of citizens and residents?

- Are the declarations of the protection of individual privacy and other rights and interests valid according to the purpose of securing the confidence of citizens and residents for the Specific Personal Information Protection Assessments? Etc.

The Commission shall, when determined necessary based on the results of the submitted Full Assessment Reports, provide guidance, advice, recommendation, order, etc. in accordance with the provisions of the Number Use Act, and request resubmission of the Full Assessment Reports or other corrective action.

## 2 Checking of Specific Personal Information Protection Assessments Not Subject to Approval

When necessary, the Commission shall examine the details of and verify the conformity and validity of the Specific Personal Information Protection Assessment Reports submitted to the Commission, which are not subject to approval by the Commission in accordance with 1.

The Commission shall, when determined necessary based on the results of the examination of submitted Specific Personal Information Protection Assessment Reports, provide guidance, advice, recommendation, order, etc. based on the provisions of the Number Use Act, and request reimplementation of the Specific Personal Information Protection Assessments or other corrective action.

## Article 11 Implementation of Measures Noted on Specific Personal Information Protection Assessment Reports

Assessment implementing organizations shall implement all measures noted on the Specific Personal Information Protection Assessment Reports as measures for reducing the risks of the occurrence of a situation which may pose the impact on individual privacy and other rights and interests, such as the divulgence of Specific Personal Information.

## Article 12 Measures against Violations of Regarding Specific Personal Information Protection Assessments

### 1 Measures against Non-implementation of Specific Personal Information Protection Assessments

Information Sharing is prohibited for affairs which are subject to implementation of Specific Personal Information Protection Assessments but for which

assessments are not implemented (Number Use Act Article 21 paragraph (2) item (ii), Article 27 paragraph (6)). The Commission shall, when determined necessary, provide guidance, advice, recommendation, instructions, etc., to or require immediate implementation of Specific Personal Information Protection Assessments or other corrective action from Assessment Implementing Organization which have not implemented assessments despite being subject to Specific Personal Information Protection Assessments.

2 Measures against Handling of Specific Personal Information Files Contrary to the Information Noted on Specific Personal Information Protection Assessment Reports

In the event handling of Specific Personal Information Files is contrary to the information noted on Specific Personal Information Protection Assessment Reports, the Commission shall, when determined necessary, provide guidance, advice, recommendations, instructions, etc., or require other corrective action.

Appendix Table (Article 6-2 (2) Related)

Specific Personal Information Protection Assessment Report Names	Noted Items Categorized as Important Changes
1 Focused Assessment Reports	1 Use of individual numbers 2 Information sharing via information provision networks 3 Specific Personal Information File types 4 Scope of applicable individuals for Specific Personal Information Files 5 Major items recorded in Specific Personal Information Files 6 Sources of Specific Personal Information 7 Usage purposes of Specific Personal Information 8 Status of outsourcing of handling of Specific Personal Information Files 9 Status of secondary outsourcing of handling of Specific Personal Information Files 10 Specific Personal Information storage locations 11 Risk countermeasures (excluding occurrence of Serious Incidents)

<p>2 Full Assessment Reports</p>	<p>1 Details of affair in which Specific Personal Information Files are handled</p> <p>2 Use of individual numbers</p> <p>3 Information sharing via information provision networks</p> <p>4 Specific Personal Information File types</p> <p>5 Scope of applicable individuals for Specific Personal Information Files</p> <p>6 Major items recorded in Specific Personal Information Files</p> <p>7 Sources of Specific Personal Information</p> <p>8 Usage purposes of Specific Personal Information</p> <p>9 Divisions utilizing Specific Personal Information</p> <p>10 Specific Personal Information usage methods</p> <p>11 Specific Personal Information matching</p> <p>12 Statistical analysis of Specific Personal Information</p> <p>13 Determinations which could impact individual rights and interests through use of Specific Personal Information</p> <p>14 Status of outsourcing of handling of Specific Personal Information Files</p> <p>15 Scope of applicable individuals for Specific Personal Information Files for which handling is outsourced</p> <p>16 Status of secondary outsourcing of handling of Specific Personal Information Files</p> <p>17 Specific Personal Information storage locations</p> <p>18 Risk countermeasures in processes where Specific Personal Information Files are handled (excluding occurrence of Serious Incidents)</p> <p>19 Other risk countermeasures</p>
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